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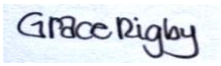
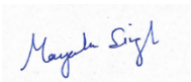
# BALTIC POWER OFFSHORE WIND FARM PROJECT, POLAND

# SUPPLEMENTAL LIVELIHOOD RESTORATION PLAN (OPERATIONAL PHASE)

DRAFT

# BALTIC POWER OFFSHORE WIND FARM PROJECT, POLAND
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# ACRONYMS AND ABBREVIATIONS

| | |
|---|---|
| B | |
| BLP | Baltic Power spółka z ograniczoną odpowiedzialnością |
| C | |
| CFP | Common Fisheries Policy |
| CoGP | Code of Good Practices for the Co-Existence of Offshore Wind Farms and Sea Fishing |
| C-TCM | Construction Transitional Compensation Mechanism |
| E | |
| EBRD | European Bank for Reconstruction and Development |
| EEZ | Exclusive Economic Zone, within the meaning of the Act of 21 March 1991 on the maritime zones of the Republic of Poland and maritime administration |
| EIA | Environmental Impact Assessment |
| EIB | European Investment Bank |
| ESAP | Environmental and Social Action Plan |
| EPP2040 | Energy Policy of Poland until 2040 |
| ESG | Environmental, Social and Governance |
| EU | European Union |
| F | |
| FGDs | Focus Group Discussions |
| FWG | Fisheries Working Group |
| G | |
| GDPR | General Data Protection Regulation |
| GM | Grievance Mechanism |
| H | |
| HDI | Human Development Index |
| HELCOM | Helsinki Commission |
| I | |
| IFC | International Finance Corporation |
| K | |
| KIIS | Key Informant Interviews |
| km | Kilometre(s) |
| L | |
| LIESC | Lenders' Independent Environmental and Social Consultant |
| LRF | Livelihood Restoration Framework |
| LRP | Livelihood Restoration Plan |
| M | |
| MIR | Morski Instytut Rybacki (National Marine Fisheries Research Institute) |
| N | |
| NP | Northland Power |
| O | |
| OCM | Operational Compensation Mechanism |
| O&M | Operations and Maintenance |
| OWF | Offshore Wind Farm |
| P | |
| PR | Performance Requirement |
| R | |
| RIA | Regulatory Impact Assessment |
| S | |

| | |
|---|---|
| SEP | Stakeholder Engagement Plan |
| SLRP | Supplementary Livelihood Restoration Plan, hereinafter referred to as Plan |
| W | |
| WTG | Wind Turbine Generators |

# 1. INTRODUCTION

This document presents the Supplemental Livelihood Restoration Plan (SLRP) for the operational phase of the Baltic Power Offshore Wind Farm Project ("the Project") in Poland, sponsored by Baltic Power spółka z ograniczoną odpowiedzialnością (BLP), a joint venture between Orlen S.A. (Poland) and Northland Power NP Baltic Wind B.V. (Canada). This document was prepared with inputs from BLP, and in collaboration with local consultancy Sotis Advisors for the Impact Assessment Chapter (Chapter 5) and Eligibility and Entitlements (E&E) Chapter (Chapter 6).

## 1.1 Context for Supplementary Livelihood Restoration Plan

The Project involves the construction and operation of a wind farm with a total capacity of up to 1,200 megawatts (MW) within the Polish Exclusive Economic Zone (EEZ) of the Baltic Sea.

The Project forms part of European Union (EU) wide climate targets and policy objectives for the period 2021 to 2030, aiming to reduce net greenhouse gas emissions by at least 55% by 2030 compared to 1990 levels[1]. Additionally, the Project is set within the context of the Energy Policy of Poland until 2040 (EPP2040), which aims to reduce national emissions in a sustainable manner, working towards eventual climate neutrality[2]. It will play a key role in supporting Poland's transition towards a clean, low-carbon economy, and aims to strengthen the country's energy security, helping to tackle air pollution and reduce energy costs.

The Project consists of several offshore and onshore components, including wind turbine generators (WTGs), power line cables and electricity sub-stations. The construction phase commenced in 2024 and is currently in progress, with operations planned to begin in 2027. The Project operational phase is 25 years with lifetime extensions under investigation up to 30 years.

As part of the Project's development, two Environmental Impact Assessments (EIAs) were undertaken in 2021[3] and 2022[4], for which the required decisions on environmental conditions[5] have been received. Several supplementary assessments have been conducted to fulfil additional Lender requirements, and a suite of environmental and social management plans, policies and procedures have been developed. The first building permits required for the onshore components of the Project were granted at the beginning of 2023.

Potential economic displacement impacts on marine livelihoods associated with the Project construction are being managed in accordance with the construction phase Livelihood Restoration Plan (LRP) finalised in November 2024 and subsequently publicly disclosed, hereinafter referred to the "construction phase LRP". This Plan has been developed to supplement the commitments outlined in the construction phase LRP and Environmental and Social Action Plan (ESAP) (ESAP No. 1.2 and 5.2), focussing on the management of potential displacement impacts on marine livelihoods during the operational phase and ensuring continuity of livelihood restoration implementation between the construction and operational phases of the Project.

[1] European Commission. (2024), 2030 Climate Targets. (online) available at: https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2030-climate-targets_en. Accessed July 2024.
[2] Republic of Poland. (2024), Energy Policy of Poland until 2024 (EPP2040). (online) available at: https://www.gov.pl/web/climate/energy-policy-of-poland-until-2040-epp2040. Accessed July 2024.
[3] MEWO Subsea Solutions and Gdynia Maritime University. (2021), Environmental Impact Assessment for the Baltic Power Offshore Wind Farm Connection Infrastructure. MEWO Subsea Solutions: Gdańsk, Poland.
[4] MEWO Subsea Solutions and Gdynia Maritime University. (2022), Environmental Impact Assessment Report for the Baltic Power Offshore Wind Farm. MEWO Subsea Solutions: Gdańsk, Poland.
[5] Such decisions specify the environmental conditions after which the fulfilment of a project can be carried out and must be issued before the issuing of permits (e.g., for buildings, planning, water).

## 1.2 Purpose of Supplementary Livelihood Restoration Plan

The purpose of this Plan is to ensure that the potential economic displacement impacts that may occur during the operational phase of the Project are managed in accordance with national requirements and Lender requirements, as established by the International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD). This Plan has been prepared with reference to Lender standards and will be implemented through the Operational Compensation Mechanism (OCM) for the O&M phase, which will remain in effect unless and until it is superseded by applicable governmental regulation. The Project's compensation obligations under this mechanism are time limited to the O&M phase and will be considered fulfilled at the conclusion of the three-year period, unless overruled by competent authorities or future regulation. The regulatory context including the status of national legislative developments, is described in full in Section 3.2.1.

The three-year duration of the OCM reflects a reasoned, project-specific estimate of the time required for affected fishers to adapt to operational conditions and restore their income-earning capacity; neither IFC PS 5 nor EBRD PR 5 prescribes a fixed duration for livelihood restoration measures. The Project is not expected to restrict access to the most valuable fishing grounds, which lie outside the wind farm area (Section 5.4.1), and compensation is calculated on the highest documented historical catch values (2018-2025, at 2025 prices) rather than current fishing effort, allowing recipients to continue fishing and adapt their practices, including via the navigation corridors described in Section 5.4.2. Together with the Construction Transitional Compensation Mechanism (C-TCM), under which compensation has been provided since 2025, this provides an implementation horizon of approximately five years, and is considered proportionate given a fleet already contracting due to external factors (Section 5.2). The adequacy of this period will be verified through the monitoring framework, annual external compliance reviews and completion audit (Chapter 9); should livelihoods not be fully restored, corrective measures will be identified, and the OCM will in any event be superseded by the applicable national framework once adopted.

## 1.3 Scope of Supplementary Livelihood Restoration Plan

The scope of the Plan includes the management of potential economic displacement impacts which may occur within and surrounding the offshore footprint of the Project during its operational phase. This includes potential impacts on the operators and crew members of commercial fishing vessels, whose livelihoods may be adversely affected by restrictions on fishing activities and vessel movements during operations.

The Plan presents the assessment of potential economic displacement impacts and corresponding mitigation measures for the operational phase of the Project. The scope of the Plan does not include:

- Impacts on activities which are undertaken within the maritime area of the Project for leisure purposes (e.g., yachting, water sports). These impacts are not to peoples' livelihoods and are addressed through other Project management plans, policies and procedures.
- Impacts on commercial shipping and navigation within the maritime area of the Project, as impacts on commercial revenues are not anticipated to occur as a result of the Project operations.
- Impacts on commercial fishing vessels which are not registered and licenced to operate in the maritime areas affected by the Project operations; given the highly regulated nature of the fishing industry in Poland, such vessels are not expected to be present and are thus not relevant to consider in the Plan.

- Impacts on the operators and crew members of marine tourism vessels. The Act of 26 September 2025 on State Aid for Shipowners of Vessels in Connection with the Introduction of the Cod Fishing Ban in the Baltic Sea (Journal of Laws 2025, item 1540) provides financial support for the scrapping of recreational vessels or their free transfer to a public administration authority or public school, available until 31 December 2026. As a result, the substantial majority of marine tourism vessels are expected to be largely decommissioned prior to the commencement of Project operations.
- Positive impacts on peoples' livelihoods as a result of the Project operations, including the generation of economic opportunities for private landlords, hotel owners and other local businesses. This impact is discussed in the SSEIA. Due to its positive nature, it does not need to be included in the Plan, which aims to restore livelihoods that may be adversely affected.
- Impacts of physical and economic displacement within the Project's onshore footprint as, after investigation, it is recognised that no such impacts are expected to occur (see Section 5 for more details).
- Impacts on the operators and crew members of commercial fishing vessels which may occur during the decommissioning phase of the Project. This phase will not begin for a minimum of 30 years. Measures to address such impacts must be based on a new LRP, prepared towards the end of the operational phase / prior to the start of decommissioning.

In summary, all adverse livelihood impacts are identified through the completion of field studies for the construction phase LRP and other assessments (e.g., the Project's EIAs and SSEIA), and these adverse livelihood impacts are captured in this document.

## 1.4 Structure of Supplemental Livelihood Restoration Plan

The Plan is structured according to the chapters presented in Table 1-1.

**Table 1-1 Structure of Supplemental Livelihood Restoration Plan**

| # | Chapter | Overview |
|---|---|---|
| 1 | Introduction | Outlines the context of the Project, alongside the purpose and scope of the Plan. |
| 2 | Project Description | Describes the offshore and onshore footprint of the Project and provides an overview of Project activities and schedule. |
| 3 | Regulatory Framework | Summarises the international, national and Lender requirements of relevance to the Plan. |
| 4 | Socio-Economic Baseline | Presents a short executive summary of the socio-economic baseline relevant to the operational phase of the Project, with reference to the full baseline presented in the Construction Phase LRP (2024) |
| 5 | Impact Assessment | Describes the potential impacts of the Project on the livelihoods of the operators and crew members of commercial fishing vessels and outlines mitigation measures accordingly. |
| 6 | Eligibility and Entitlements | Defines the groups of persons who will be eligible to receive compensation or additional support in the context of the Project, together with further details about these entitlements. |
| 7 | Stakeholder Engagement | Identifies key stakeholders, summarises the engagement activities undertaken prior to and during the development of the Plan and defines the stakeholder engagement and information disclosure activities to be undertaken during the implementation of the Plan. |

| # | Chapter | Overview |
|---|---|---|
| 8 | Implementation | Defines the arrangements for implementing the Plan, inclusive of roles and responsibilities, timeline and the process for managing grievances. |
| 9 | Monitoring and Evaluation Framework | Provides a framework for tracking the implementation of the Plan. |

# 2. PROJECT DESCRIPTION

This chapter provides an overview of the Project, inclusive of its location, key activities and schedule. The offshore footprint of the Project is established, and a summary of the efforts made by BLP to avoid and minimise the potential displacement impacts that may occur within this footprint is presented. The onshore footprint of the Project is also described in Section 2.4 of the Construction Phase LRP, together with a justification as to why it is not included within the scope of that document.

## 2.1 Project Location

The Project is located within the Polish EEZ of the Baltic Sea, north of the communes of Łeba and Choczewo in northern Poland. The wind farm will be located at a distance of approximately 22 kilometres (km) to 34 kilometres from the shore, at water depths ranging from 34 to 45 metres. The Project's onshore infrastructure will be located in the communes of Łeba and Choczewo, which are situated in the counties of Lębork and Wejherowo respectively (Pomeranian Voivodeship[6]). A map which illustrates the geographical and administrative context of the Project is presented in Figure 2-1. Several other offshore wind farms (OWFs) are planned in proximity to the Project; further details about such wind farm developments are provided in the Cumulative Socio-economic Impact Assessment.

[6] The highest level of administrative division in Poland, corresponding to a province in many other countries.

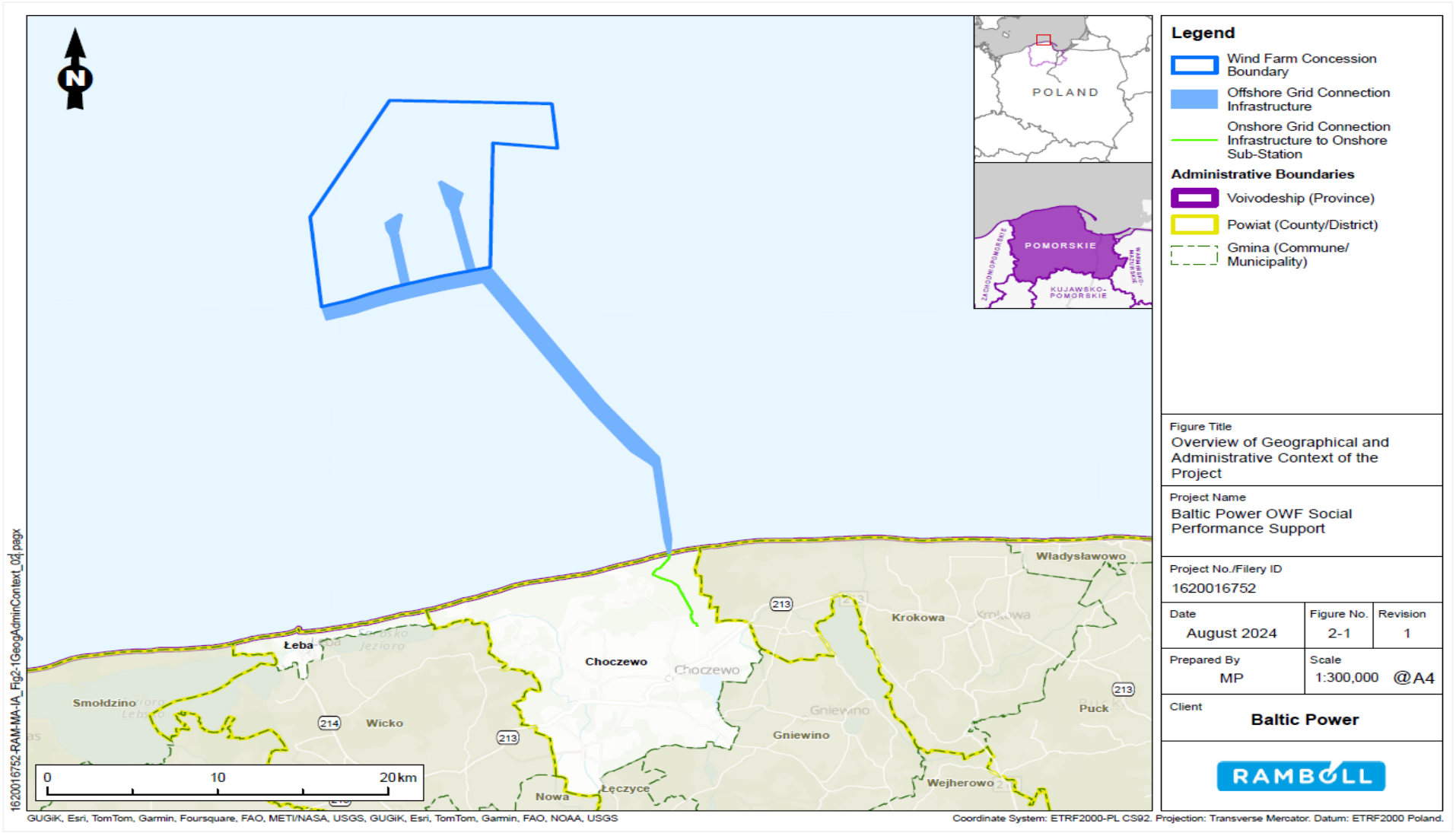



**Figure 2-1 Overview of Geographical and Administrative Context of the Project**

## 2.2 Offshore Project Footprint

The Project consists of the following offshore components:

- 76 WTGs, each with a maximum rotor diameter of 236 metres and a maximum height of 258.3 metres, supported by foundational structures (i.e., monopiles and transition pieces);
- a network of 66 kilovolt (kV) inter array cables;
- two electricity sub-stations; and
- four sub-sea export power line cables from the wind farm to the shore, measuring between 30.5 and 32.5 km in length.

The WTGs, inter array cable network and two electricity sub-stations are located within a maritime development area of 113.72 $km^2$, constituting the site of the wind farm itself. This area is smaller than the area for which BLP holds a licence, which measures 131.08 $km^2$ in size. Within this area, the WTGs will be spaced approximately 944 m to 1,416 m apart, in a manner that optimises the harvest of wind energy (i.e., this has been the driving factor behind the arrangement of the WTGs in the Project's design).

For the operational phase, safety and exclusion zones are currently anticipated to apply to offshore infrastructure; however, the final conditions for operations will be determined by the Maritime Office in Gdynia and may change from the arrangements during the construction phase. Based on current arrangements, the following are expected to apply:

- a safety/exclusion encompassing the entire OWF site, covering all WTGs, offshore substations, and inter-array cables. This zone will function as a "no go zone" where passage of non-Project vessels and fishing activities are not permitted.
- a safety zone encompassing the entire offshore export cable corridor (OFFEXC), as defined by the permission to lay and maintain cables (PUUK). This zone will function as a "no fishing zone" where passage of non-Project vessels is permitted; however fishing activities are not permitted. ;

These consolidated safety zones remain subject to confirmation by a new ordinance to be issued by the Maritime Office in Gdynia, based on applications currently being developed and discussed by BLP. The scope and conditions governing navigation and access within operational safety zones remain subject to confirmation and may be revised prior to or during the operational phase.

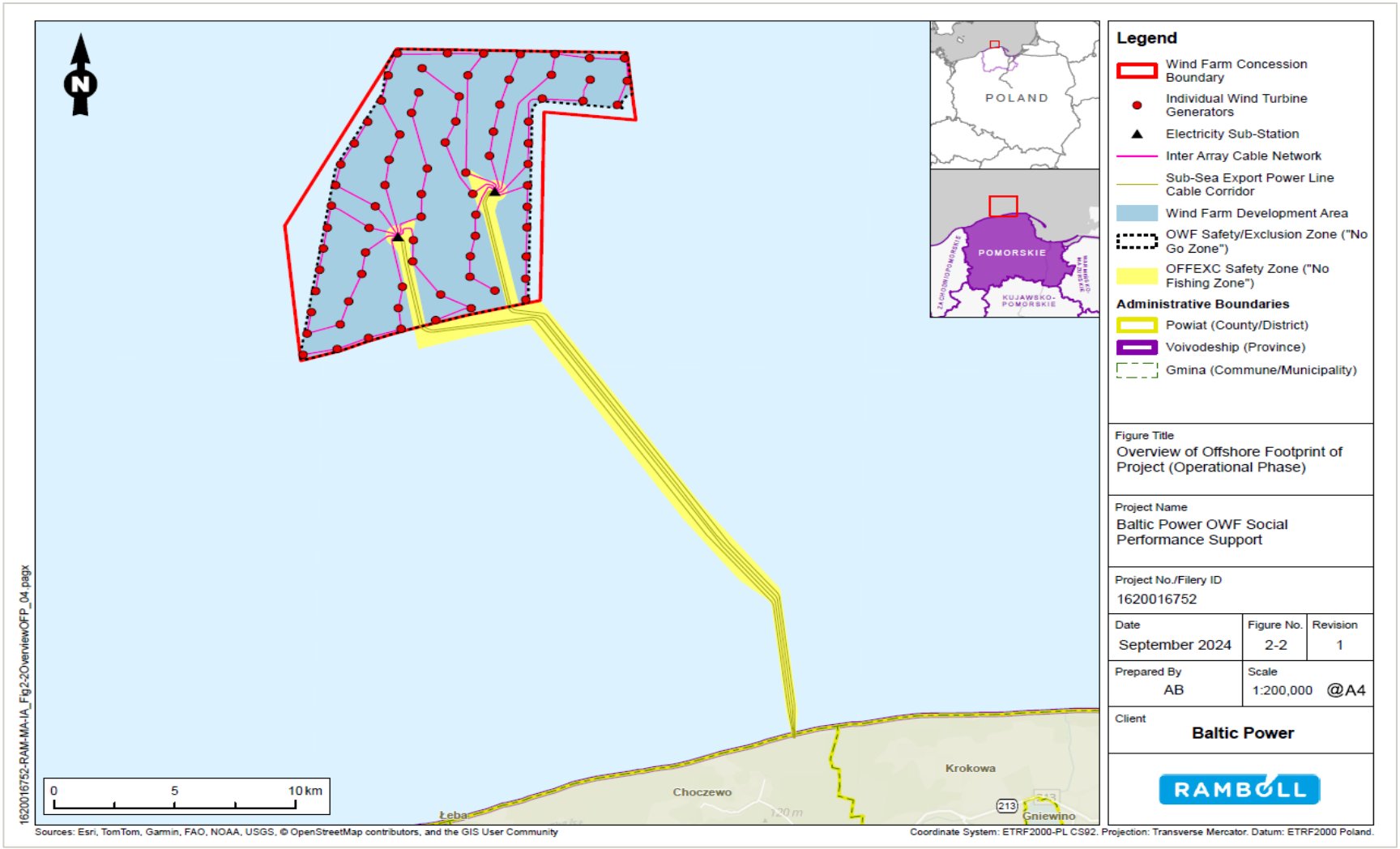



**Figure 2-2 Overview of Offshore Footprint of Project**

Note: OWF Safety / Exclusion Zone and OFFEXC Safety Zone shown on map are subject to confirmation by the Maritime Office in Gdynia.

## 2.3 Project Operational Activities and Schedule

The operation of the Project's offshore components will entail the performance of periodic inspection and maintenance activities within the site of the OWF, as well as within the corridor of the sub-sea export power line cables between the wind farm and the shore. Such activities will be performed by medium-sized vessels operating in and out of the Port of Łeba (commune of Łeba), as the designated O&M (i.e., service) port for the Project. The average number of daily vessel trips which are expected to be made to / from the site of the wind farm during operations is yet to be confirmed but is estimated at an average of five vessels per day, recognising that the intensity of daily vessel activity will vary throughout the year. Vessels are likely to operate on every day of the week, typically between the hours of 0530 and 2100. In exceptional circumstances (i.e., in the event of an emergency), vessels will also travel to / from the site of the wind farm between the hours of 2100 and 0530.

As indicated in Section 1.1, the operational phase of the Project will start in 2027 and will last for a minimum duration of 25 years, with lifetime extensions under investigation up to 30 years.

At the time of preparing the Plan, safety zones have been established around the offshore components of the Project under an ordinance issued by the Maritime Office in Gdynia, which currently prohibit navigation and other activities by non-Project vessels within these zones, subject to limited exemptions for specified vessel categories. These arrangements effectively result in full restrictions for non-Project vessels and livelihood activities within the safety zones, unless a vessel is exempt under the ordinance or specific consent is granted by BLP. There is thus potential for the site of the OWF to be completely closed off to non-Project users during operations, with all livelihood activities and non-Project vessel movements to be prohibited within and through the site; however, this will be subject to future decisions made by the Maritime Office in Gdynia and other relevant governmental authorities (e.g., the Ministry of National Defence). The passage of non-Project vessels through the maritime area affected by the sub-sea export power line cables is currently planned to be permitted but whether livelihood activities (e.g., fishing) will be permitted within the route of the cable corridor is yet to be confirmed. However, in accordance with Order No. 20 of the Director of the Maritime Office in Gdynia dated 6 August 2026, fishing within the corridor of submarine export cables is not permitted. This has been taken into account in the calculations of compensation for the period of operation.

In addition to the above, it is possible that a safety area will be permanently established around the site of the wind farm during operations; discussions between BLP and the Maritime Office in Gdynia regarding the permanent establishment and conditions of such an area are ongoing.

# 3. REGULATORY FRAMEWORK

This chapter summarises the international, national and Lender requirements of relevance to the Plan and explains the basis on which the Plan has been prepared in the absence of a finalised national framework for fisheries compensation and co-existence. Note that the provisions of this Plan may be overruled or amended by applicable governmental regulation once adopted.

## 3.1 International Requirements

International requirements of relevance to the Plan remain consistent with those described in Section 3.1 of the Construction Phase LRP (2024). These include international and EU Frameworks relevant to marine environmental protection, public access to environment information and participation in decision-making, fisheries management and marine planning, and data protection (including the EU GDPR). These instruments provide an overarching context for stakeholder engagement, information disclosure and management of personal data in relation to livelihood restoration measures. Please refer to Section 3.1 and Table 3.1 of the Construction Phase LRP (2024) for further details.

## 3.2 National Requirements

National requirements of relevance to the Plan are broadly consistent with those described in Section 3.2 of the Construction Phase LRP (2024), which summarise Polish legislation applicable to the management of maritime areas and safety zones, the regulation of fisheries activities, the national EIA framework (including public participation/disclosure requirements), and personal data protection.

Offshore wind energy development in Poland is governed by the Offshore Act. The Offshore Act establishes the regulatory framework for offshore wind farm projects in Polish waters and aims to facilitate the development of renewable energy sources as a key component of Poland's energy transition. The Act clarifies regulations and eliminates legal gaps to support offshore wind development, thereby increasing energy security.

In the context of offshore wind and marine livelihoods, a specific national mechanism for fisheries compensation was expected to be addressed through the Code of Good Practices (CoGP) under the Sector Deal. At the time of drafting this Plan, the CoGP is on hold and the status of the related ministerial regulations on compensation is uncertain. Accordingly, the Plan continues to be developed with reference to the applicable national legal framework and will be updated as relevant national requirements governing compensation are clarified. Please refer to Section 3.2 and Table 3.2 of the Construction Phase LRP (2024) for further details.

### 3.2.1 Update on Sector Deal and Code of Good Practices

On 15th September 2021, representatives of the Polish government, current and future OWF developers, the scientific and research community and the fishing industry, amongst other stakeholders, signed a letter of commitment to develop the Sector Deal (referring, in full, to the Sector Agreement for the Development of Offshore Wind Energy in Poland). The Sector Deal was established to address coexistence between offshore wind energy development and other maritime activities, particularly commercial fishing. The overarching aims of the Sector Deal are to support the development of the offshore wind sector in Poland and to maximise the share of local content in Polish projects.

Under the Sector Deal, several working groups have been established, including a Fisheries Working Group (FWG). The FWG is a multi-stakeholder working group consisting of representatives of Polish government (namely the Department of Fisheries of the Ministry of Agriculture and Rural Development), OWF developers and fisheries organisations (e.g., associations and producer groups).

The FWG which is currently on hold, was tasked with developing an approach to enable the safe co-existence of sea fisheries and OWFs in Poland, inclusive of the approach to verifying and compensating for any economic losses and increased operating costs incurred by the operators of commercial fishing vessels. To this end, the FWG met on several occasions between June 2022 and November 2023; the approach that was developed over the course of these meetings is presented in the CoGP, providing the basis for further discussion and negotiations. Further details about these meetings and the latest status of the CoGP are presented in Section 7.2.2 of the Construction Phase LRP.

At the time of drafting the Plan, the CoGP is on hold. As shared by BLP, the draft CoGP was presented to the Sector Deal working group 6.3 (co-existence of the offshore sector with the fishing industry), was widely criticised by the sector, authorities, and the fishing community, and has not been updated since, noting that Sector Deal meetings are on hold. BLP has further indicated that works on ministerial regulations regarding compensation were removed from the Amendment to the Offshore Act (UD162), which passed through Parliament on 9 October 2025 and was signed by the President of Poland on 4 November 2025, and that further work on fisheries compensation has been delegated to the Ministry of Agriculture and Rural Development; at the time of drafting, the status of these works is not known. The reason for removing the regulations regarding fisheries compensations is not officially known and confirmed; however there were plenty of comments both from the fisheries and the offshore wind industry which were marginally different from the suggested regulations.

Given the current status of the CoGP and compensation related regulations, the Plan has been prepared based on the available project commitments and interim arrangements and will be updated as required once the applicable national framework for operational co-existence and/or compensation is clarified. Given that the CoGP remains on hold, the Plan will be updated as required once applicable ministerial regulations are finalised, and BLP remains committed to ensuring alignment with any requirements established thereunder.

Notwithstanding the above, the development, negotiation and agreement of an approach to enable the safe co-existence of sea fisheries and OWFs in Poland is expected to not materially progress in the near future, resulting in the need for Baltic Power to develop a suitable solution as an individual project. BLP nevertheless remains committed to complying with the government regulations once they have been imposed.

### 3.2.2 Other National Regulations Affecting the Fishing Fleet

At EU level, targeted fishing for eastern Baltic cod has been prohibited since July 2019, initially under emergency measures adopted by the European Commission (Commission Implementing Regulation (EU) 2019/1248) and subsequently under Council Regulation (EU) 2019/1838 of 30 October 2019 and the successive Council regulations fixing fishing opportunities (TACs). The prohibition, together with associated restrictions on recreational cod fishing, remains in force for 2025–2026 (see Section 5.2.1).

The Act of 26 September 2025 on State Aid for Shipowners of Vessels in Connection with the Introduction of the Cod Fishing Ban in the Baltic Sea (Journal of Laws 2025, item 1540) provides financial support for the scrapping of recreational vessels or their free transfer to a public administration authority or public school. Financial support under this Act is available until 31 December 2026. As a result, a significant number of recreational vessels are expected to be scrapped by the end of 2026, and from 2027 onwards, the number of still-active recreational vessels is expected to decline considerably.

Whereas the cod fishing ban is an EU-level conservation measure restricting fishing activity, the Act of 26 September 2025 described above is a national state-aid instrument adopted in response to the consequences of that ban and it does not itself restrict fishing activity but provides time limited financial support to the owners of vessels affected by it.

Other regulatory instruments of relevance to the structure and size of the fishing fleet include Regulation (EU) No 1380/2013 on the Common Fisheries Policy, which establishes the system for balancing fishing capacity entering and exiting the fleet (Article 23(1)) and the basis for the national Action Plan addressing structural overcapacity (Article 22(4)), as well as the programme "European Funds for Fisheries" for the years 2021–2027, co-financed by the European Maritime, Fisheries and Aquaculture Fund (EMFAF), which supports, inter alia, the permanent cessation of fishing activities through vessel scrapping or conversion. These instruments and their effects on the fishing fleet are described further in Section 5.2.2.

### 3.3 Lender Requirements

The Project is seeking financing from several Lenders, including the EBRD and European Investment Bank (EIB). Alignment with Lender standards and guidelines must therefore be ensured. In the context of managing Project-induced displacement impacts, compliance with the IFC PS 5[7] and EBRD PR 5[8] is specifically required.

The requirements of IFC PS 5 and EBRD PR 5 which are of relevance to the Plan are presented in Table 3-3 of the Construction Phase LRP (2024). By way of summary, the key requirements of IFC PS 5 are as follows:

- Feasible design alternatives should be considered in order to avoid or, where avoidance is not possible, minimise displacement impacts. Where economic displacement cannot be avoided, the affected persons should be offered compensation at full replacement cost[9] and other assistance to help them to improve (or at least restore) their standards of living and livelihoods to pre-project levels. This applies as relevant to the Project's impacts on livelihoods.
- Persons who have formal legal rights to the affected assets, who do not have formal legal rights but have a claim that is recognisable under national law and who have no recognisable legal rights or claims at all should be eligible for compensation and other forms of assistance.
- Compensation for economic displacement should be paid promptly and, wherever possible, prior to impact.
- An LRP should be developed to compensate persons who are affected by economic displacement and offer other forms of assistance. Provisions for monitoring and evaluating the implementation of the LRP should be established with corrective action to be taken as necessary.
- Affected persons who are vulnerable to economic displacement impacts should be identified and provided with additional assistance, as necessary.
- Affected persons should participate in and be consulted on the planning, implementation, monitoring and evaluation of compensation payments and other forms of assistance.
- A grievance mechanism should be developed and implemented to receive and facilitate the resolution of the concerns of the affected persons in a prompt and timely manner.
- Opportunities should be provided to displaced persons to derive appropriate development benefits from the project.

The requirements of EBRD PR 5 are generally aligned with those of IFC PS 5. EBRD PR 5 further requires, in cases where economic displacement cannot be avoided, a suitably qualified specialist

[7] Referred to, in full, as IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement. This performance standard constitutes one of the IFC's eight performance standards on environmental and social sustainability, which were launched in 2012.
[8] Referred to, in full, as EBRD Performance Requirement 5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. This performance requirement constitutes one of the EBRD's 10 environmental and social performance requirements, which were launched in 2019.
[9] Defined as the market value of the asset plus transaction costs, not taking into account depreciation (where relevant).

to be engaged to carry out a census and socio-economic baseline within the affected area and assist with the preparation of an LRF. Note that, whilst EBRD PR 5 uses the term 'LRF', the intent of this document is the same as that of an LRP (under IFC PS 5).

# 4. SOCIO-ECONOMIC BASELINE

This chapter presents an executive summary of the socio-economic baseline relevant to the operational phase of the Project. The full baseline is presented in Chapter 4 of the Construction Phase LRP (2024), which should be read alongside this chapter for further detail.

No new primary baseline data collection was undertaken for this Plan. The primary data collected for the Construction Phase LRP between April and May 2024 is considered valid and representative of current conditions. No major socio-economic changes within the affected ports or associated maritime sectors have been identified or reported since that time.

## 4.1 Socio-Economic Development Context

As described in Section 2.1, the Project is located in northern Poland, offshore north of the communes of Łeba and Choczewo, within the Pomeranian Voivodeship (Pomorskie Region or Pomerania Province). This section provides a summary of the socio-economic development context. Please refer to Section 4.2 of the Construction Phase LRP (2024) for further detail.

The Pomeranian Voivodeship remains a region of very high human development, with a Human Development Index (HDI) of 0.888 in 2021, above the national average of 0.876. Educational attainment levels in Łeba and Choczewo continue to be comparable with national averages, with over one quarter of the population having completed higher education.

As of 2022, unemployment in the Pomeranian Voivodeship was 4.6%, slightly below the national rate of 5.2%. In comparison, Łeba recorded higher unemployment at 10.5% and Choczewo 5.4%, with average monthly salaries in both communes remaining below provincial and national averages[10].

Industry and services, particularly tourism, continue to dominate the local economy, providing employment for more than half (55%) of the working population[11]. Agriculture, forestry and fishing represent a smaller share, accounting for approximately 6.2% of the Pomeranian Voivodeship regionally and 8.6% and 9.6% in the communes of Łeba and Choczewo respectively[30].

The maritime area associated with the Project continues to support commercial fishing, marine tourism and navigation. As noted in Section 1.3, marine tourism vessels are expected to be decommissioned by the end of 2026 and are therefore outside the scope of this Plan. Impacts on commercial shipping remain outside the scope of this Plan. The regional and local socio-economic context described in the Construction Phase LRP remains valid for the Operational Phase.

## 4.2 Commercial Fishing

This section provides a summary of the key characteristics and trends associated with commercial fishing livelihoods. Please refer to Section 4.3 of the Construction Phase LRP for further details.

Most commercial fishing vessel operators and crew members (over 90%) are male, with most aged between 36 and 50 years. All survey respondents were Polish nationals, primarily residing in Ustka, Łeba and Władysławowo.

The Project's offshore infrastructure intersects with five fishing squares: N7, N8, O7, O8 and O6. Squares O8 and N7 account for the largest shares of the cumulative catch recorded between 2013–2024, at 27% and 25% respectively, as shown in Figure 4-1 below.

[10] Statistics Poland. (2022), Poland in Numbers. (online) available at: https://www.polskawliczbach.pl/. Accessed July 2024.
[11] Statistics Poland. (2022), Poland in Numbers. (online) available at: https://www.polskawliczbach.pl/. Accessed July 2024.

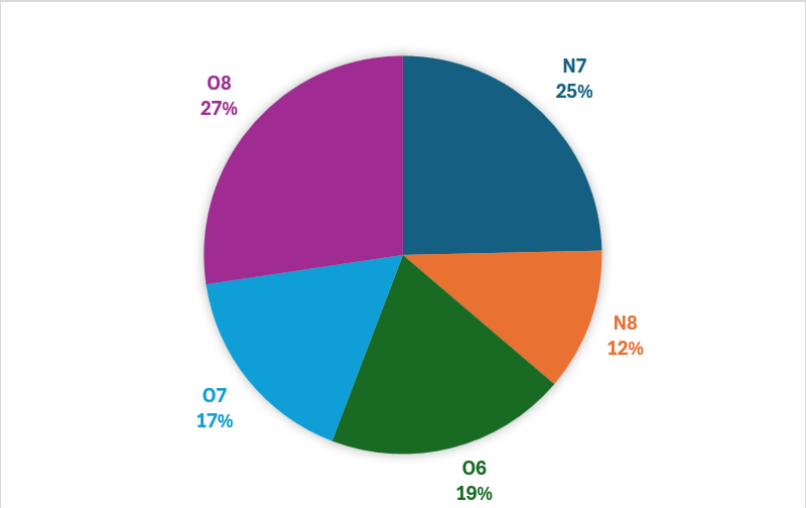



**Figure 4-1 Relative Share of Fishing Squares in Cumulative Catches From 2013 to 2024**

*Source: Sotis calculation based on Fisheries Monitoring Centre VMS data supported by logbook information.*

Cumulative catches from the five fishing squares amounted to 2.4 thousand tonnes during 2013–2024, with the highest annual catch of 550 tonnes recorded in 2015. Compared with the 2015 peak, catches declined by 93% by 2024. The principal target species in these areas are herring, sprat, flounder and cod. The decline was particularly pronounced for cod, with landings falling to only a few kilograms in 2024 following the introduction of the fishing ban in 2019, which came into effect in January 2020. Annual catches by species during 2013–2024 are shown in Figure 4-2 below.

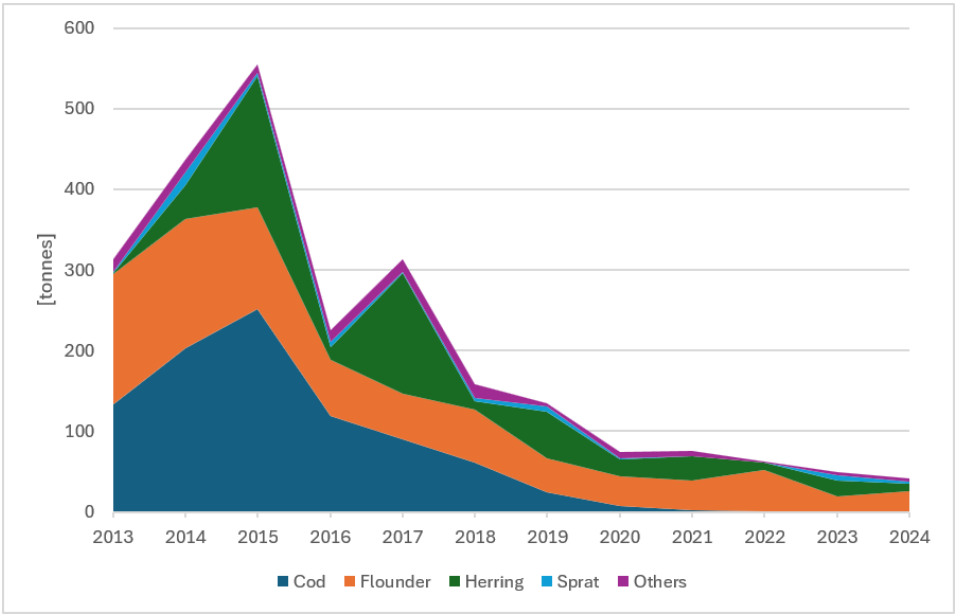



**Figure 4-2 Species Composition of Catches in the Affected Fishing Squares From 2013 to 2024**

*Source: Sotis calculation based on Fisheries Monitoring Centre VMS data supported by logbook information.*

Changes in fishing effort reflect the changes in catch volumes described above. The average annual fishing effort deployed in the area over 2013-2024 amounted to 450 fishing days and involved 45

vessels. In 2024, fishing effort was 70% lower in terms of fishing days and 55% lower in terms of the number of vessels than the 2013–2024 average, illustrated in Figure 4-3 below.

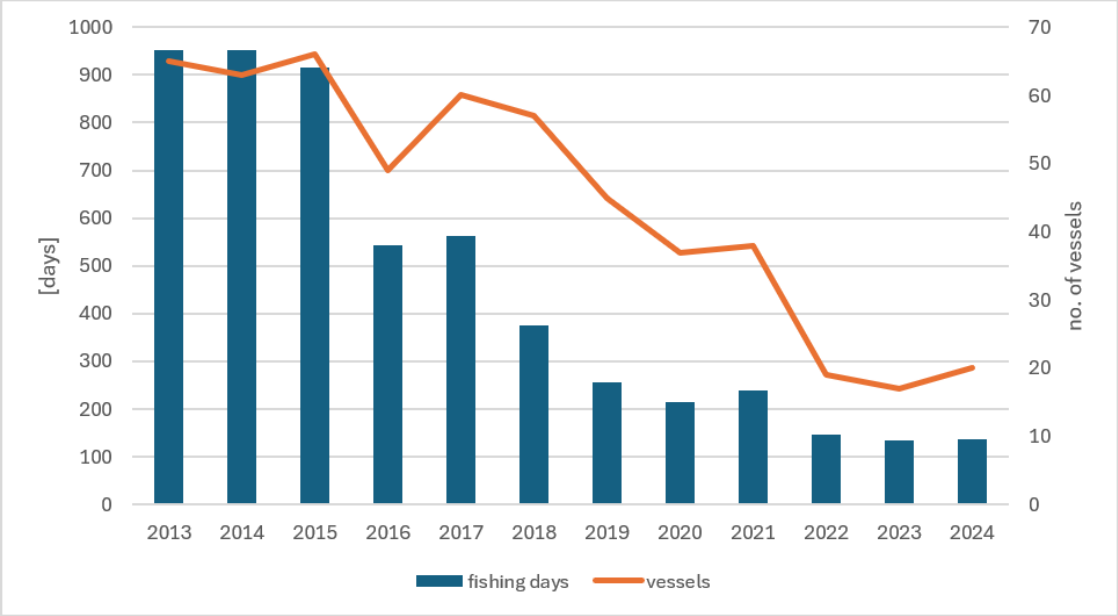



**Figure 4-3 Fishing Effort in the Affected Fishing Squares From 2013 to 2024**

*Source: Sotis calculation based on Fisheries Monitoring Centre VMS data supported by logbook information.*

Most vessels operating in the affected areas are based at the Port of Łeba, followed by Ustka and Władysławowo. The total number of active vessels has declined overall since 2013.

Around half of survey respondents (48%) regard commercial fishing as their most important source of income. The majority reported a decline in fishing income over the past five years, attributed primarily to the 2019 cod fishing ban and national inflation. Around half (48.2%) have considered leaving the profession.

## 4.3 Marine Tourism

The Act of 26 September 2025 on State Aid for Shipowners of Vessels in Connection with the Introduction of the Cod Fishing Ban in the Baltic Sea (Journal of Laws 2025, item 1540) provides financial support for the scrapping of recreational vessels or their free transfer to a public administration authority or public school. This support is available until 31 December 2026.

Implementation of this support is well advanced. Under the Project's C-TCM, 52 tourist vessels received one-off compensation in 2025. The Regulatory Impact Assessment (RIA) accompanying the Act identified 98 potential beneficiaries of the state aid programme, of which 35 fall within the Baltic Power impact area. As of 31 July 2026, 31 of these 35 had applied to the programme, together with a further four vessels not identified as eligible in the RIA. Of the applications received in total, six vessels had been granted funds and were preparing for physical scrapping, 25 remained under review, and four had been refused (Figure 4-4). Additionally, in response to a public information request of 24 July 2026, the Maritime Office in Gdynia confirmed that, across its area of responsibility, it had received 42 *de minimis aid* applications, granting 34, refusing three and leaving five unexamined, with a further three state aid applications under consideration; a response from the Maritime Office in Szczecin remains outstanding. As no official register of tourist vessels is maintained in Poland, these figures reflect data compiled from programme records, maritime office correspondence and direct engagement with vessel owners.

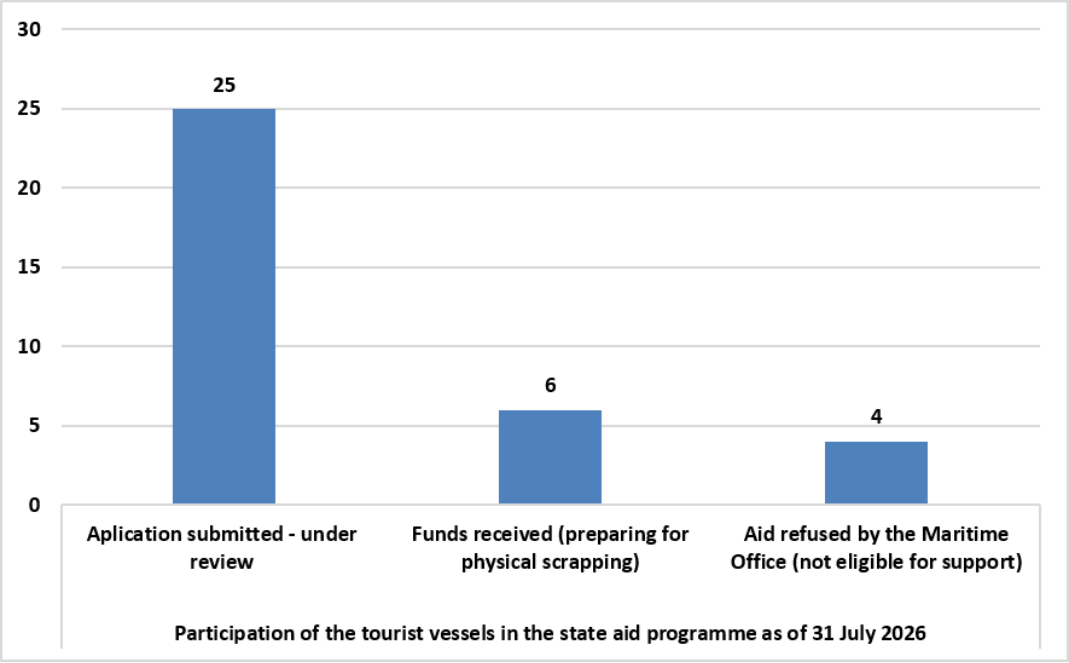



**Figure 4-4 Participation of Tourist Vessels in the State Aid Programme As of 31 July 2026**

*Source: Sotis Analysis, July 2026*

A survey of marine tourism vessels undertaking recreational fishing trips, carried out in 2018/2019 under the Multiannual Fisheries Data Collection Programme by the National Marine Fisheries Research Institute (MIR), recorded no marine tourism vessels conducting recreational fishing trips in the maritime areas affected by the Project; the only vessels recorded in proximity to these areas were the 24 vessels affiliated with the Port of Łeba, whose recreational fishing trips declined from 1,095 in 2018 to 754 in 2019. Key informant interviews with port representatives, undertaken as part of the baseline data collection in 2024, further indicated that marine tourism activity in the affected ports was already limited, with only one marine tourism vessel actively operating at the Port of Ustka at the time of the baseline survey, and several registered vessels operating only during the peak tourism season (June to September) (see Section 4.4 of the Construction Phase LRP, 2024). Taken together with the implementation of the state aid programme described above, the substantial majority of marine tourism vessels are expected to be decommissioned before Project operations commence. The number of active marine tourism vessels during the operational phase is expected to be negligible.

Moreover, based on discussions with vessel owners undertaken by Sotis Advisors in 2026, the small number of operators who have not applied for scrapping support appear to have adapted to changed market conditions, for example by undertaking environmental monitoring work for offshore wind farm and nuclear projects, or by organising recreational fishing trips from larger ports. Residual operational-phase impacts on this group are expected to be negligible, and these operators retain access to the Project's grievance mechanism.

For this reason, marine tourism operators and crew members are not included within the scope of this Plan. The full baseline for this group is presented in Section 4.4 of the Construction Phase LRP (2024) for reference.

## 4.4 Vulnerability

The socio-economic baseline for the Construction Phase LRP (2024) identified a number of factors that may increase the vulnerability of commercial fishing households to potential economic displacement impacts associated with the Project. These groups are presented in Table 4-1. Vessel operators and crew members who belong to all three groups (i.e., those with potentially limited financial, social and human capital) may potentially experience heightened vulnerability as a result of the interplay of these factors. It is important to note that the provisions of Table 4-1 reflect the socio-economic baseline as it was in 2024 and may no longer be applicable given that over two

years have now passed; the principles set out in this section for determining vulnerability will nevertheless be applied to all requests received under this Plan.

**Table 4-1 Potentially Vulnerable Groups**

| Group | Details |
|---|---|
| Commercial fishing vessel operators and crew members with limited financial capital | This group includes those vessel operators and crew members who do not undertake supplementary livelihood activities in addition to commercial fishing and / or who lack access to additional sources of income (e.g., from other members of their household). It also includes those whose households have low incomes, in particular those who qualify for social assistance / benefits from the state. A relatively small number of such vessel operators and crew members and their households were identified through the socio-economic and livelihoods survey as receiving social assistance / benefits from the state (representing 5% of survey participants). These individuals may be less able to cope with the potential adverse impacts of the Project on their livelihoods as they have fewer alternative economic resources to rely upon due to their limited financial capital. |
| Commercial fishing vessel operators and crew members with limited social capital | This group includes those vessel operators and crew members who live alone (i.e., in single-person households) and / or do not have a wider social support network (e.g., of extended family and friends). It also includes those who do not belong to any livelihood groups or associations. A minority of vessel operators and crew members who live in single-person households were identified through the socio-economic and livelihoods survey (representing 9% of survey participants), whilst a considerable number of vessel operators and crew members do not belong to commercial fishing groups or associations (representing 52% of survey participants). These individuals may be less able to cope with the potential adverse impacts of the Project on their livelihoods as they have less social support to draw upon due to their limited social capital. |
| Commercial fishing vessel operators and crew members with limited human capital | This group includes those vessel operators and crew members who have lower levels of education, less diversified skills and / or limited experience in other industries and sectors. For example, 7% of those who participated in the socio-economic survey in May 2024 were educated at the primary or junior secondary school level. Older generations of vessel operators and crew members are more likely to belong to this group relative to those who belong to younger generations. At the time of the May 2024 survey, for example, 10% of survey participants were aged 65 years and above. These individuals may be less able to cope with the potential adverse impacts of the Project on their livelihoods as they may be less able to transition to other professions due to their limited human capital. |

## 4.5 Key Baseline Indicators

Table 4-2 presents a preliminary set of livelihoods and living standard indicators for persons who may be potentially economically displaced as a result of the Project. These indicators are based on the socio-economic and livelihoods survey undertaken in April and May 2024, and will be useful for monitoring and evaluation purposes (further details about which are presented in Chapter 9).

**Table 4-2 Baseline Indicators**

| Indicator |
|---|
| Trend in income levels (i.e., whether these are increasing or decreasing) |
| Obtainment of skills, qualifications and experience |

# 5. IMPACT ASSESSMENT

This chapter was prepared by Sotis Advisors for the purpose of developing the compensation mechanism for fishers for the operational phase of the Baltic Power offshore wind farm. It presents an analysis of potential cumulative impacts with other offshore wind farms in the Polish part of the Baltic Sea that can be identified at the current stage.

## 5.1 Offshore Wind Farm Projects covered by Phase I of the Support Scheme

As part of the analysis, offshore wind farm projects covered by the so-called Phase I of the support scheme (up to 5.9 GW) were identified, as defined in the Act on promoting electricity generation in offshore wind farms and in the decisions of the President of the Energy Regulatory Office (Figure 5-1), namely the following projects:

- Baltic Power (ORLEN/Northland Power)[12] - the most advanced offshore wind farm project in Poland, with a total installed capacity of approximately 1.2 GW, the first to enter the construction phase and the first to start the operational phase, i.e. the production and transmission of electricity to the Polish power system. Completion of construction is planned for 2026, with full-scale operation expected to begin in early 2027. The operations and maintenance base (O&M Base) located in the Port of Łeba, in operation since May 2025, will support the exploitation of the Baltic Power offshore wind farm for a period of 30 years.
- Bałtyk 2 and Bałtyk 3 (Equinor/Polenergia)[13] - the second most advanced project, under construction since the beginning of 2025. The Bałtyk 2 project will be implemented first, with Bałtyk 3 constructed partly in parallel. The two projects, with a combined capacity of approximately 1.4 GW, are scheduled to enter commercial operation in 2028. In 2026, construction of the operations and maintenance base in Łeba will be completed; this facility will serve as a coordination centre for vessel traffic and offshore operations for the Bałtyk 2 and Bałtyk 3 projects.
- Baltica2 and Baltica3 (PGE/Ørsted) - Baltica 2 is being implemented first, with the final investment decision (FID) for this project taken in January 2025[14]. Completion of construction and commissioning of the Baltica 2 offshore wind farm, with a total capacity of approximately 1.5 GW, is planned by the end of 2027. According to information published on the investor's website[15], the Baltica 3 project is currently in the optimisation phase, and its implementation schedule is not publicly available at this stage. The operations and maintenance base for both projects is under construction in Ustka and is planned to be commissioned in 2026[16].
- BC-Wind (C-Wind Polska / Ocean Winds) - based on publicly available information, the offshore wind farm with a capacity of 390 MW is officially in the construction phase; the final investment decision (FID) was taken and project financing closed in December 2025. Construction works are expected to start in 2026, and the start of energy production is planned for 2028. The service base for the project will be located in Władysławowo[17].
- Baltic Trade and Invest – BTI (F.E.W. Baltic II, RWE / currently in the process of being taken over by PGE) – at present the least advanced project, undergoing a change of developer, with detailed project information not publicly available.

[12] Baltic Power

[13] O projektach | Farmy wiatrowe na Bałtyku

[14] PGE and Ørsted take a final investment decision on Baltica 2

[15] https://baltica.energy/pl-pl/baltica-two-and-three

[16] Kluczowe dane o projektach; Informacje o projekcie Baltica 2

[17] Projekt – Ocean Winds ,
Green-news.pl - Rok domykania projektów. Ocean Winds ma dwa miliardy euro i rusza z budową morskiej farmy ,
BC-Wind Enters the Construction Phase. Kacper Kostrzewa on Financing, Local Content and Lessons from the First Phase - Baltic Wind

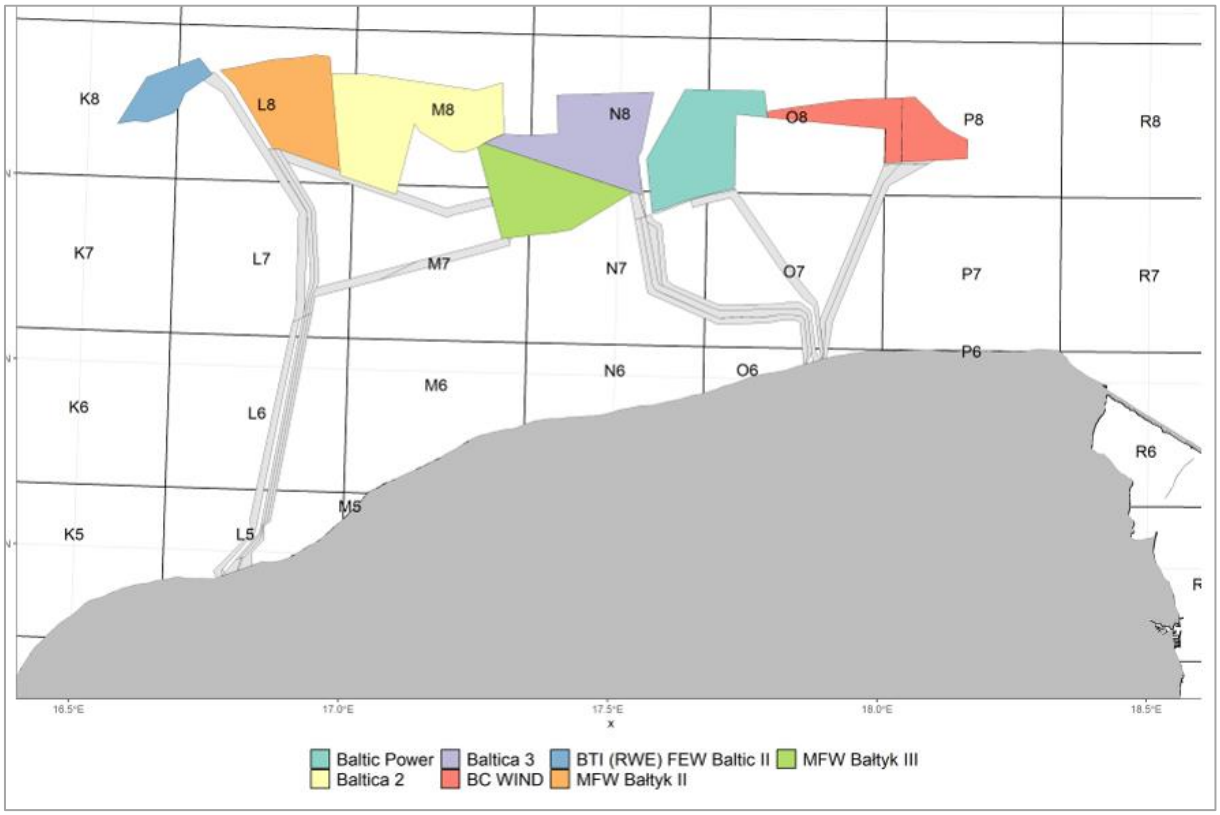



**Figure 5-1 Phase 1 Offshore Wind Farm Projects in the Baltic Sea**

*Source: Sotis, February 2026*

Within the overall layout of the planned offshore wind farm clusters, corridors have been designated to allow vessels to move from south to north and in the opposite direction, as shown in Section 5.4.2. One of these corridors is located west of the Baltic Power offshore wind farm.

As mentioned above, these projects are at different stages of preparation and implementation, with the Baltic Power offshore wind farm being the first project for which completion of the construction phase is scheduled for the second half of 2026 and transition to full operational phase at the beginning of 2027.

Taking into account that the construction schedules of the abovementioned projects depend on weather conditions in the Baltic Sea, in particular on factors that are critical from a technological perspective for the piling works (low wave height or its absence), it should be borne in mind that these timelines may be subject to change[18]. In line with the original assumptions, all projects under Phase I of the support scheme are expected to be commissioned by the end of 2030.

## 5.2 Impact of External Factors on the Current Situation and Structure of the Fisheries Sector

### 5.2.1 Cod Fishing Ban

In the Eastern Baltic Sea, the ban on targeted fishing for eastern Baltic cod, introduced by Council Regulation (EU) 2019/1838 of 30 October 2019[19], remains in force. In view of the persistently critical status of cod stocks, this ban has been renewed annually in subsequent Council regulations of the European Union fixing fishing opportunities (TACs). For the years 2025–2026, this ban also

[18] "Weather windows at the Baltic Sea" - Gdynia Maritime University research - Research in Poland, oraz BAERT Benjamin, Analysis of the Installation of a Series of Piles for Offshore Wind Turbine Foundations, University of Rostock, February 2014 (Public Version, Feb 2014.pdf) BAERT Benjamin - URO (Public Version, Feb 2014.pdf

[19] Council Regulation (EU) 2019/1838 of 30 October 2019 fixing for 2020 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea and amending Regulation (EU) 2019/124 as regards certain fishing opportunities in other waters eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R1838

remains in effect and its further extension is highly likely due to the poor ecological status of the cod population.

### 5.2.2 External Factors Shaping the Structure and Size of the Fisheries Fleet

Poland is also required to comply with the rules of the system for balancing the fishing capacity entering and exiting the fleet[20], as set out in Article 23(1) of Regulation (EU) No 1380/2013.[21] This system is of key importance for the structure of the Polish fisheries sector, as it prevents Polish fishers from introducing new or more efficient vessels into the fleet without first withdrawing vessels with equivalent (or greater) engine power and gross tonnage (kW/GT). The entry–exit mechanism effectively prevents an increase in fishing pressure on fish stocks by forcing a reduction of the fleet in the absence of possibilities for its modernisation. In practice, this reinforces the trend of the gradual disappearance of traditional cutter fisheries: the lack of new licences blocks young fishers from entering the profession, and since 2004 Poland has been consistently reducing the fishing capacity of its Baltic fleet.

In 2022, in accordance with Article 22(4) of Regulation (EU) No 1380/2013, an Action Plan was drawn up, setting out adjustment objectives (reduction of surplus kW/GT), the instruments to achieve balance (permanent cessation of fishing activities), and the implementation timeframe (2021–2027)[22]. Implementation of the Action Plan for those segments of the Baltic Sea fleet in which a structural overcapacity has been identified is carried out under the European Maritime, Fisheries and Aquaculture Fund (EMFAF) through schemes for the permanent cessation of fishing activities. In 2026, the support system under the programme "European Funds for Fisheries" for the years 2021–2027, co-financed by the EMFAF in Poland, remains in place. This support is primarily targeted at the commercial fishing fleet and crew members employed on board fishing vessels and includes, among other measures, instruments enabling the permanent cessation of fishing activities, in particular under Measure 1.7 "Permanent cessation of fishing activities – scrapping or conversion of a fishing vessel".

Under this Programme, support for the marine commercial fishing fleet has been channelled through several measures covering human capital, innovation, diversification of fishing activities and temporary cessation of fishing. These measures provide funding for improving or acquiring professional qualifications in marine fisheries, creating networks and exchanging information, developing or starting additional economic activities, and using renewable or recovered energy in existing operations, as well as unit-rate compensation for up to 30 days of temporary cessation of fishing operations. Eligible applicants are owners and operators of commercial fishing vessels and fishers conducting commercial activities as natural persons. Crew members employed on board may therefore benefit indirectly, through improved skills, safer and more modern vessels and income stabilisation during lay-up periods. The current list of the main planned calls for proposals, as updated on 9 July 2026, is available on the programme website[23].

According to the "Annual report on efforts undertaken to achieve balance between fishing capacity and fishing opportunities for the period from 1 January to 31 December 2024", by 28 April 2025, under two calls for applications conducted from 1 December 2023 to 29 December 2023 and from 3 January 2024 to 31 January 2024, a total of 138 fishing vessels had been scrapped, most of which were vessels under 12 m in length (104 in total).

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[20] Raport_flotowy_za_2024_r_(wraz_z_planem_działania).pdf - Annual report on efforts undertaken to achieve balance between fishing capacity and fishing opportunities for the period from 1 January to 31 December 2024

[21] https://eur-lex.europa.eu/eli/reg/2013/1380/oj/eng

[22] Annual report on efforts undertaken to achieve balance between fishing capacity and fishing opportunities for the period from 1 January to 31 December 2024

[23] Harmonogram naborów wniosków o dofinansowanie w programie Fundusze Europejskie dla Rybactwa 2021–2027. Available at: https://rybactwo.gov.pl/dokumenty/harmonogram-naborow-wnioskow-o-dofinansowanie-w-programie-fundusze-europejskie-dla-rybactwa-2021-202/

In summary, the number of commercial fishing vessels has already decreased significantly. According to data from the Statistics Poland (GUS)[24], as of 31 December 2024 there were 108 fishing cutters[25] with a length of 15–30 m (compared to 124 vessels in 2021) and 611 fishing small-scale boats in 2024 (compared to 697 such boats in 2021). These figures reflect the trends in the fisheries sector described above. In 2024, the average age of a fishing cutter was 52.1 years (compared to 49.9 years in 2021).

GUS data on the cutter fleet (vessels 15–30 m in length) by port of registration for the three affected ports also show a downward trend:

- In Ustka, 20 fishing cutters were registered at the end of 2021, compared with only 12 on 31 December 2024;
- In Łeba, the number of cutters decreased from 8 (as of 31 December 2021) to 6 vessels at the end of 2024; and
- In Władysławowo it fell from 37 in 2021 to 36 at the end of 2024.

As of 13 April 2026, according to data from the EU Fleet Register (Fleet Register online database), there are a total of 106 fishing vessels of all length categories registered in ports between Ustka and Władysławowo:

**Table 5-1 Fishing Vessels by Ports of Registration (as of 13 April 2026)**

| Port of registration | 0-7,99 m | 08-11,99m | 12-17,99m | 18-23,99m | > 24 m | Total |
|---|---|---|---|---|---|---|
| Dębki | 4 | | | | | 4 |
| Łeba | 1 | 12 | 1 | 1 | 1 | 16 |
| Rowy | 1 | 1 | | | | 2 |
| Ustka | 2 | 18 | 3 | 7 | 3 | 33 |
| Władysławowo | 7 | 7 | 3 | 18 | 16 | 51 |
| Total | 15 | 38 | 7 | 26 | 20 | 106 |

In addition, analyses of the state of the Polish Baltic fisheries sector indicate that the fishing community is shrinking and ageing; the average age of Baltic fishers is estimated at around 48 years, with low interest among young people in entering the profession due to EU regulations and declining catches[26]. Traditional Baltic fisheries are gradually becoming a disappearing activity.

## 5.3 Support for Fishers

### 5.3.1 Regulatory Measures

As of today, the design of the government compensation mechanism being developed by the Ministry of Agriculture and Rural Development is not yet known.

The last known draft was included in the proposed amendments to the Act on the promotion of electricity generation in offshore wind farms and certain other acts (initial draft version of 6 February 2025, draft No. UD162) but was withdrawn following numerous comments submitted by the fishing community, developers and other organisations. The draft introduced, among other things, a legal basis for paying compensation to fishing vessel operators for loss of income resulting from the construction, operation and decommissioning of an offshore wind farm and its related

[24] Rocznik Statystyczny Gospodarki Morskiej 2025 (Statistical Yearbook of Maritime Economy), Warszawa, Szczecin 2025 Główny Urząd Statystyczny / Obszary tematyczne / Roczniki statystyczne / Roczniki Statystyczne / Rocznik Statystyczny Gospodarki Morskiej 2025

[25] Statistical Yearbook of Maritime Economy, 2025: The cutter fleet by length is shown in line with the classification by the National Marine Fisheries Research Institute in Gdynia. Fishing cutter is a fishing vessel with a continuous deck, the total length of which is more than 15 m and less than 30 m, and the main propulsion power does not exceed 611 kW.

[26] Instrat-Policy-Paper-012024_Niespokojny-Baltyk.pdf

export infrastructure. However, it did not provide for any compensation for recreational angling vessels or any other categories of users.

Recreational fishers (angling activities) are not covered by any EU-funded financial support schemes. One-off financial assistance from the State was provided in connection with the COVID-19 pandemic in 2020 under the Regulation of the Minister of Maritime Economy and Inland Navigation of 26 June 2020 laying down detailed conditions for granting financial support to owners or operators of commercial yachts used for recreational fishing, which expired on 31 December 2020. In 2025, the Act of 26 September 2025 on State aid for vessel owners in connection with the introduction of the cod fishing ban in the Baltic Sea (Journal of Laws 2025, item 1540) was adopted and is currently in force. Financial support under this Act (for scrapping a vessel or transferring it free of charge to a public administration authority or a public school for non-commercial purposes) is available until 31 December 2026. As a result, a significant number of recreational vessels is likely to be scrapped by the end of 2026, and in 2027 and subsequent years the number of recreational vessels still in operation is expected to decrease substantially (it is estimated that approximately 100 recreational vessels along the Polish Baltic coast will benefit from this scheme, which means that only a few vessels will remain active in 2027).

### 5.3.2 Support Mechanisms Provided by Offshore Wind Farm Developers

In the absence of a government-mandated compensation scheme for fishers, offshore wind farm developers are establishing their own temporary compensation mechanisms for affected communities. Currently, there are three published temporary compensation schemes for the offshore wind farm construction phase, all based on similar principles:

- Baltic Power (ORLEN/Northland Power) - the first transitional compensation mechanism for the offshore wind farm construction phase, published on Baltic Power website: https://balticpower.pl/dla-rybakow/
- Bałtyk 2 and Bałtyk 3 (Equinor/Polenergia) - the second transitional compensation mechanism for the offshore wind farm construction phase, partly based on the assumptions of the Baltic Power scheme, published on the Bałtyk 2&3 project website: https://baltyk123.pl/dla-spolecznosci/rekompensaty-dla-rybakow/

Under these two construction-phase schemes, financial compensation has been available since 2025 for owners of commercial fishing vessels (on an annual basis, for vessels with documented fishing activity within the offshore wind farm area) and for owners of recreational vessels (on a one-off basis, in selected ports). In the case of Baltic Power, an additional support mechanism has been introduced for crew members of commercial fishing vessels in the event of job loss resulting from project implementation. No cases have been identified to date. Based on the assessment of anticipated operational impacts, job losses directly attributable to the Project are considered unlikely. Current and anticipated changes in employment in the Polish Baltic fisheries sector are largely driven by wider regulatory and economic factors (such as fleet capacity reduction schemes, declining catches and demographic trends), rather than by the Baltic Power Project itself. BLP will nonetheless retain the dedicated support mechanism for crew members should such cases arise.

- Baltica2 and Baltica3 (PGE/Ørsted) – a third transitional compensation scheme for potentially affected communities, which covers the same groups as the two previous schemes (https://baltica.energy/pl-pl/for-fishermen). Based on the information currently available, applications for financial support from affected communities are already being accepted.

In the near future, if national regulations continue to be lacking, another transitional compensation scheme can be expected to be introduced, covering at least the construction phase of the BC-Wind offshore wind farm project.

## 5.4 Cumulative Impacts

### 5.4.1 Location of OWF Projects in Relation to Fishing Areas (Fishing Grounds)

The location of the Baltic Power offshore wind farm in relation to attractive fishing areas in the analysed part of the Baltic Sea is illustrated in Figure 5-2 below.

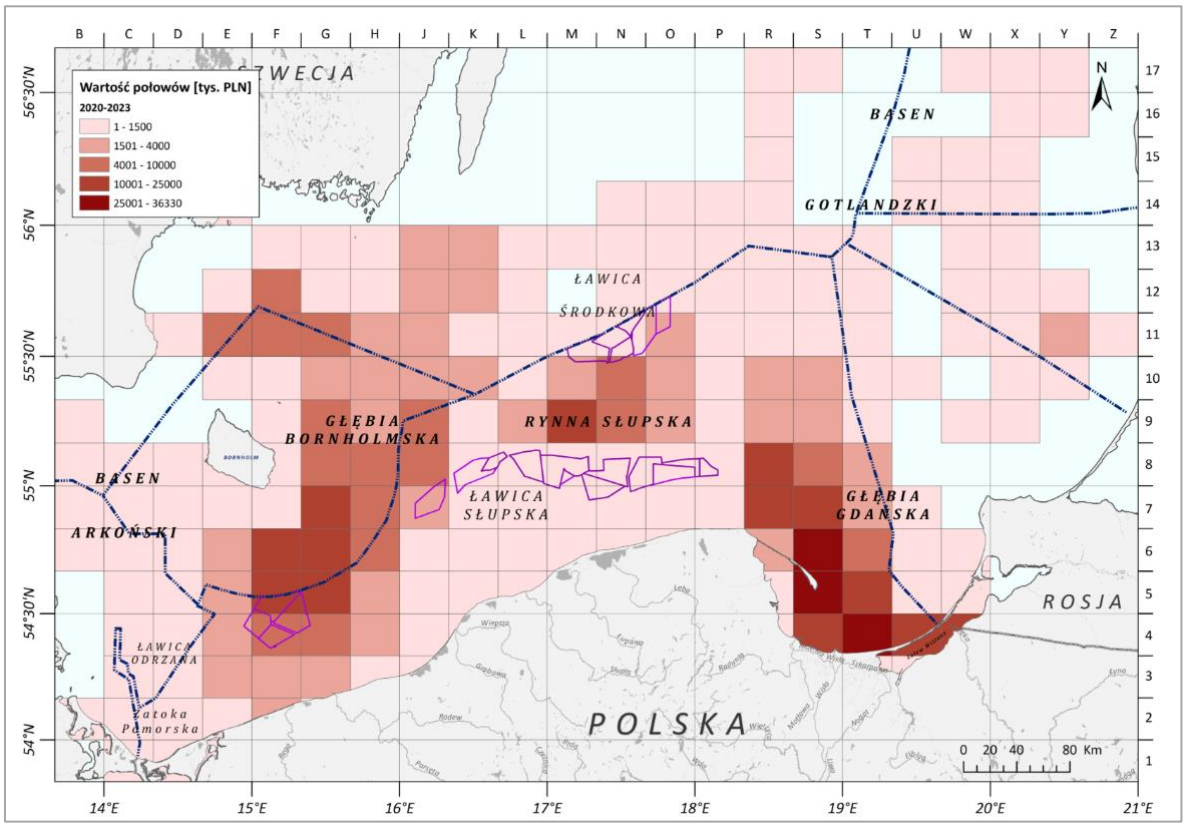



**Figure 5-2 Average Catch Value by Fishing Square (2020–2023) in Relation to OWF Phase I and II Concession Areas**

*Source: Sotis, MIR-PIB*

As shown on the map above, the Baltic Power offshore wind farm area is not located within the boundaries of valuable fishing grounds, which are situated to the north (in the "Rynna Słupska" - Słupsk Trough) and to the east and west of the Phase I wind farms group.

### 5.4.2 Delimitation of the Area of Potential Cumulative Impacts

The locations of Phase I offshore wind farms form the following clusters in the Baltic Sea (Figure 5-3) divided by the passage corridor between the windfarms:

- Area „W" (*West*) comprises a clustered group of wind farms located to the west of the corridor separating the locations of the Baltic Power OWF and the Baltica 3 OWF. This area therefore includes the locations (from west to east) of the following wind farms: Bałtyk II, Baltica 2, Bałtyk III and Baltica 3.
- Area „E" (East) groups the locations situated to the east of the corridor enabling passage along the S–N route, i.e. the Baltic Power and BC Wind projects.

The potential cumulative effects related to the spatial barrier created by the offshore wind farms in these locations are mitigated by the abovementioned corridors free of offshore wind farm infrastructure. These corridors will enable free and safe navigation between the wind farms and shorten the routes of fishing vessels to the fishing grounds located to the north of these clusters.

Therefore, due to the corridor located between Bałtyk II and BTI (RWE) FEW Baltic II, which allows access to the fishing grounds situated to the north of Area "W", the FEW Baltic II area has been excluded from further analyses.

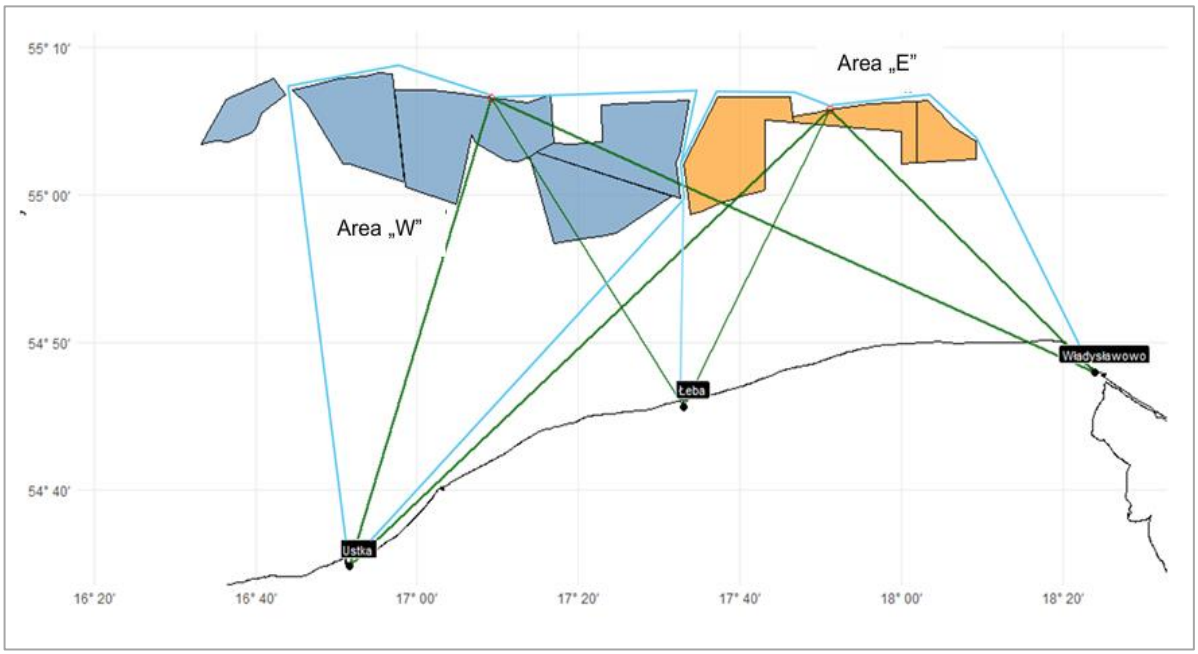



**Figure 5-3 Schematic Vessel Routes from Ustka, Łeba and Władysławowo to Fishing Grounds North of OWF Areas "W" and "E", Shortest and Detour Routes**

*Source: Sotis, January 2026*

**Area „W"**

Following preliminary analyses, schematic shortest routes for vessel movements from the three ports affected by the Project (the ports of Ustka, Łeba and Władysławowo) to the fishing grounds (represented by conventionally adopted points[27]) located north of Areas "W" and "E" were determined. Subsequently, routes bypassing these OWF clusters (for example, via the aforementioned corridors free of offshore wind farm infrastructure) were identified. This analysis confirmed that, since the Baltic Power OWF is located to the east of the corridor separating Areas "W" and "E", it does not contribute to any spatial barrier created by the windfarms within Area "W" for vessels navigating to fishing grounds north of that area. On this basis, the western Area "W" was excluded from further analyses.

The operation of the Baltic Power OWF will not result in cumulative impacts, together with the wind farms located in Area "W", on fishing vessels sailing to the fishing grounds north of this area, because:

- In the case of fishing vessels from Łeba, the corridor between Areas "W" and "E" runs almost in a straight line to the north of the port, which allows direct access to the fishing grounds located further to the north. As shown on the map, vessels sailing from Łeba to the eastern fishing grounds have to bypass Area "E" via this corridor (issues related to the cumulative impacts of the Baltic Power and BC-Wind wind farms are addressed in subsequent analyses). Vessels heading to the western fishing grounds bypass Area "W" using the same corridor; however, this results from the location of the other wind farms grouped within Area "W", and not from the location of the Baltic Power wind farm (situated to the east of the corridor).
- Similarly, for vessels from the port of Ustka, reaching the western fishing grounds requires an extension of the route and bypassing Area "W" via the above-mentioned corridor, which is not determined by the location of the Baltic Power OWF. In addition, vessels from Ustka have access to a corridor running along the western side of Area "W", which allows them to bypass this area from the west and is likewise unrelated to the location of the Baltic

[27] The fishing grounds were defined as points located halfway along the meridional distance between the easternmost and westernmost points on the edges of Areas "W" and "E".

Power OWF. By contrast, reaching the eastern fishing grounds from Ustka involves a certain extension of the route and passing through the corridor between Areas "W" and "E" in order to bypass Area "E" (and in particular the Baltic Power wind farm); this effect has been taken into account in the analyses and calculations.

- In the case of vessels from Władysławowo heading to fishing grounds located north of Area "W", the significant extension of the route results from the need to bypass Area "E" from the north, i.e. the Baltic Power and BC-Wind wind farms. This effect has been taken into account in the subsequent analyses.

**Area „E"**

In order to assess the cumulative impacts associated with fishing vessels having to bypass Area "E" when travelling to fishing grounds located to the north, a notional point[28], designated as the "Fishing Ground", was identified, and indicative shortest routes from the three ports affected by the Project (Ustka, Łeba and Władysławowo) were mapped, as shown in Figure **5-4** below:

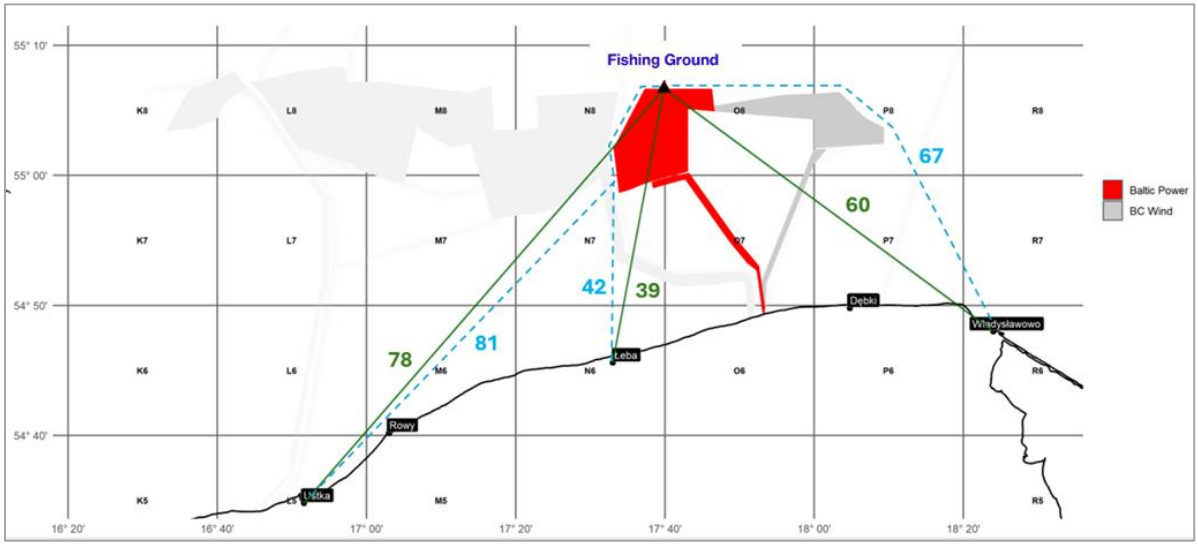



**Figure 5-4 Vessel Routes Lengths from Ustka, Łeba and Władysławowo to Fishing Grounds North of OWF Cluster: Shortest vs. Bypass Route**

*Source: Sotis Analysis, March 2026*

These analyses indicate that, owing to the presence of an unobstructed corridor west of the Baltic Power offshore wind farm, fishing vessels from Ustka and Łeba will need to travel only approximately 3 km farther, one way, to reach the designated "Fishing Ground" point. In view of the planned commencement of construction of the BC-Wind offshore wind farm and the simultaneous entry of the Baltic Power offshore wind farm into full operation, the route to the "Fishing Ground" for vessels from Władysławowo will be extended by approximately 7 km, one way, due to the need to bypass the area of the BC-Wind offshore wind farm under construction.

Figure 5-5 below illustrates the schematic routes of fishing vessels to the "Fishing Ground" point, bypassing the Baltic Power offshore wind farm in full operation. In this scenario, the routes from the three ports affected by the Project are extended by approximately 1-3 km:

[28] As the 'Fishing Ground', a notional point was adopted on the northern edge of the Baltic Power wind farm area, located halfway along the meridional distance between the easternmost and westernmost points on the edges of the BLP offshore wind farm area.

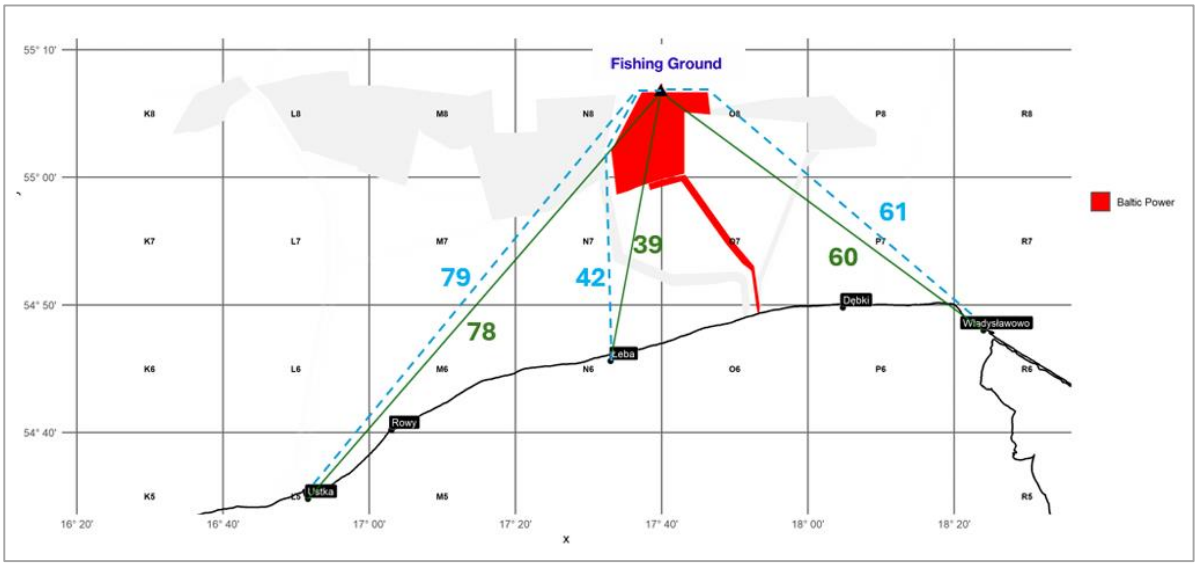



**Figure 5-5 Vessel Routes Lengths Ustka, Łeba and Władysławowo to Fishing Grounds North of the Baltic Power OWF: Shortest vs. Bypass Route**

*Source: Sotis Analysis, March 2026*

**Cable routes**

Baltic Power cable routes run through fishing squares O7 and O6, and cables for neighbouring offshore wind farms (i.e. BC-Wind and Baltica 3) will also be laid there. Consequently, due to the increased occupation of these marine areas by linear technical infrastructure developed by different project owners, fishing activities in these squares will be subject to constraints. (Figure 5-5). Specifically, in accordance with Order No. 20 of the Director of the Maritime Office in Gdynia, no fishing activities are permitted directly above the export cable routes, which means that fishing in these ares is not possible, even for vessels only transiting to other fishing grounds. At this stage, no cumulative impacts on fishing activities have been identified.

5.4.3 Potential Impacts of the Construction and Operation of Offshore Wind Farms on Fishing Activities

The following assessment of potential impacts draws on the socio-economic baseline data collected through engagement with commercial fishing stakeholders during the development of the Construction Phase LRP, as described in Chapter 4 and Chapter 7.

When presenting the potential impacts of offshore wind farms on fishing activities, it should be emphasised that during the operational phase, the number of OWF-related vessels operating at sea will be significantly lower than during the construction phase, which will consequently reduce constraints on fishing activities.

The construction and operation of several offshore wind farms within the same area of the Baltic Sea may result in the following impacts:

- **The occupation of parts of previously used fishing grounds by offshore wind farm areas and export cable routes** - this applies to both the construction and operational phases of the wind farms. For the purposes of the analyses, a precautionary approach was adopted, assuming that fishing activities will not be possible within the boundaries of OWF areas or directly above export cable routes; vessels will only be able to transit over the cable routes.
  However, it should be emphasised that these restrictions primarily apply to fishing grounds located south of the main fishing areas identified for the analysed fleet. As a result, the core fishing grounds will remain accessible, while a permanent loss of part of the fishing area will occur in the vicinity of the OWF clusters.

- **Difficulties in accessing fishing grounds** - the most valuable fishing grounds are located north of the clusters of planned offshore wind farms covered by the first phase of the support scheme. Reaching these grounds from the ports will be hindered by the west–east alignment of the OWF clusters, which form a partial barrier (Figure 5-3). However, the navigation corridors (Section 5.4.2) designed between the clusters reduce the extent of route detours required. As demonstrated by the detailed calculations in the following chapter, the additional detour distance is limited and results in relatively low additional voyage times and fuel costs. This issue concerns vessels authorised to operate more than 12 nautical miles from the coast (predominantly vessels over 12 m in length) and is identified in both the construction and operational phases.

  **Difficulties in fishing within coastal fishing squares where export cable routes from various wind farms are located**. These difficulties occur during both the construction and operational phases of OWFs and primarily affect small vessels operating in the coastal zone (less than 12 m in length). The constraints are both spatial and organisational in nature and may involve a narrowing of the available fishing area within a given square, especially where safety zones are established along the cable routes, as well as restrictions on the use of certain fishing gears (in particular bottom-contact gears and anchoring) in the immediate vicinity of the cables. At the same time, the export cable routes themselves generally do not constitute an obstacle to accessing the fishing grounds.
- In relation to **ports where offshore wind farm service bases are located**, and assuming that appropriate organisational measures are implemented, no significant cumulative impacts on fishing activities are expected. Potential constraints are primarily spatial and organisational in nature and may involve a reduction in the number of berths available for fishing vessels and the need to relocate some boats to other mooring positions. In addition, during periods of increased service activity, temporary difficulties in accessing certain sections of the quays may occur; these are transient in nature and linked to the servicing schedule. Minimising such impacts requires the implementation of appropriate measures and actions by port authorities, in particular the designation of quay areas reserved for the fishing fleet, the appropriate spatial planning of these areas and the adjustment of vessel traffic rules so as to ensure uninterrupted access of fishing vessels to the port and to berthing areas. Key interactions between offshore wind farms and fisheries take place mainly in the marine space, with regard to access to fishing grounds, changes in navigation routes and the safety of fishing operations in the vicinity of the farms (including the need to avoid safety zones and infrastructure). In ports, if appropriate organisational solutions are applied, such interactions are limited to a level that is negligible from the point of view of the functioning of the fishing fleet.

  A review of international experience regarding the impacts of offshore wind farms on fisheries likewise shows that attention is focused primarily on spatial interactions and conflicts in fishing areas and on the organisation of fishing activities at sea, rather than on the impact of offshore wind farms on the functioning of fishing ports. In recent years, the coexistence of offshore wind farms and fisheries has been the subject of in-depth analyses covering numerous countries and sea basins, as reflected, inter alia, in reports such as "Overview of the effects of offshore wind farms on fisheries and aquaculture" (CINEA, 2021)[29], "Enabling sustainable coexistence between offshore wind farms and small-scale fisheries in Dutch waters" (Wageningen Marine Research, 2025)[30] and "Exploring coexistence opportunities for offshore wind and fisheries in South Korea: Global overview and best practices for South Korea" (Carbon Trust, 2024)[31]. Issues relating to fishing ports are practically not addressed in these studies as a distinct area of impacts or potential

[29] OverviewEffectsOffshoreWindFarms.pdf

[30] https://edepot.wur.nl/705225 (Enabling sustainable coexistence between offshore wind farms and small-scale fisheries in Dutch waters. Author(s): Neitzel, S.M. and Deetman, B., Wageningen Marine Research Report: C102/25)

[31] Fisheries Report_ENG, Exploring Coexistence Opportunities for Offshore Wind and Fisheries in South Korea, Global Wind Energy Council, 2024

conflicts. On this basis, it can be concluded that, in international experience to date, the impact of offshore wind farms on the functioning of fishing ports is of marginal importance compared with the impacts occurring on the fishing grounds themselves and in the marine space.

- **The positive effects associated with the location of service bases** relate primarily to improved maintenance of existing port infrastructure, including ensuring the navigability of fairways, which can partially offset any potential inconveniences experienced by the fisheries sector. In ports where service bases for offshore wind farms are located, the development of these functions may be accompanied by the modernisation of quays and parts of the port infrastructure, which in the longer term may help to improve overall port operating conditions, including for fishing vessels.
  The most recent examples are the ports of Łeba and Ustka, where the Maritime Office in Gdynia[32] is implementing projects to adapt both ports for the development of offshore service terminals. These projects are co-financed under the National Recovery and Resilience Plan (KPO), Component B2.2.3 'Construction of offshore terminal infrastructure'. At the same time, the implementation of these investments will improve the currently periodically constrained navigational conditions (including by reducing excessive wave action and siltation at the port entrances) and will increase the safety and accessibility of the ports for both vessels serving offshore wind farms and other port users[33]. Importantly, a significant share of the works is being carried out by companies from the region.
  In the case of the service base in Łeba, the facility will also provide employment for around 80 people over the next 30 years, representing a significant long-term strengthening of the local labour market and an important driver of development at the local level.
- **For small fishing ports along the coast, serving mainly the smallest vessels operating in the coastal zone**, no substantial impacts of offshore wind farms on the functioning of the ports themselves are anticipated, either directly (quay infrastructure, availability of berthing places, range of services) or indirectly. Potential effects associated with offshore wind farms are concentrated primarily at the level of coastal fishing grounds, in particular in the squares crossed by export cable routes, where local difficulties in carrying out fishing operations or the need to adjust how they are organised may arise, without any clear implications for the way small coastal ports are used.

[32] https://www.umgdy.gov.pl/fundusze_europejskie/

[33] Budowa morskiego terminalu serwisowego offshore w Łebie z dofinansowaniem z KPO - Baltic Wind (7 April 2025)
https://gp24.pl/modernizacja-portu-w-lebie-roboty-przebiegaja-zgodnie-z-harmonogramem/ar/c3p2-28264725 (13 December 2025)

# 6. ELIGIBILITY AND ENTITLEMENTS

This chapter defines the groups of persons who will be eligible to receive compensation or additional support in the during the operational phase of the Project. The approach to and methodology for determining the amount of compensation that will be paid to eligible groups is subsequently presented, followed by details about additional support for eligible groups.

It is important to note that the eligibility and entitlements presented in this chapter is based entirely on work undertaken and information provided by BLP. Ramboll has not been involved in or responsible for defining the eligibility and entitlements presented in this chapter. Details of such eligibility and entitlements (as defined and provided by BLP) have nevertheless been incorporated into this chapter of the Plan by Ramboll.

## 6.1 Underlying Assumptions of the Compensation Mechanism

Taking into account the situation in which the operational phase of the Baltic Power offshore wind farm takes place in parallel with the construction of neighbouring projects, the following assumption has been adopted for the purposes of developing the compensation mechanism:

Baltic Power will be responsible for potential impacts on fisheries arising from its operational phase (including the corresponding compensation), whereas impacts associated with the parallel construction of other wind farms in this area and any related compensation, will fall within the responsibility of their respective developers. The same approach should be applied to the routes of power export cables.

Under this approach, each project covers the effects of those impacts for which it is directly responsible at a given stage of its life cycle. As the first project to be implemented and operated in the Polish part of the Baltic Sea, the Baltic Power offshore wind farm cannot be regarded as the entity responsible for compensating future impacts arising from the operation of wind farms that have not yet entered this phase.

### 6.1.1 Purpose and Duration of the Mechanism

The mechanism has been designed to provide appropriate compensation to fishers as part of livelihood restoration, in line with the requirements of the financing banks and institutions, and to enable them to adapt to the new situation at sea, in which the area occupied by the Baltic Power offshore wind farm will no longer be available for fishing.

The mechanism has been developed for the operational phase of the Baltic Power offshore wind farm, for a period of three years. The implementation period of this mechanism may be shortened if and when relevant government regulations on compensation are prepared and enter into force.

### 6.1.2 Components of the Compensation Mechanism

Compensation under the Operational Compensation Mechanism (OCM) consists of the following components:

- **Compensation for Loss of Fishing Income** in marine areas occupied by the Project (the offshore wind farm area and its export cable connection within fishing squares N7, N8, O6, O7 and O8), calculated on the basis of official catch data collected by the Fisheries Monitoring Centre (Centrum Monitorowania Rybołówstwa, CMR) for the period 2018–2025. In calculating this compensation, Baltic Power has chosen not to apply deductions for operational costs (such as fuel, crew remuneration, and vessel maintenance) that would normally be offset against income loss. Consequently, the compensation is based on gross income loss, without accounting for cost savings that would result from not undertaking fishing activities.
- **Compensation for Other Disruptions on Fishing Activities** associated with the operation of the Baltic Power offshore wind farm (the so-called "**other disruptions**"). Compensation amounts under this component, differentiated by vessel length category,

are based on the same compensation rates established for the construction phase of the Baltic Power offshore wind farm (the Construction-Transitional Compensation Mechanism), indexed to the rate of inflation.

Within this Component, additional costs arising from the need to bypass the operating BLP wind farm, and thus from the extended route to and from fishing grounds located further north, have been taken into account (i.e. costs resulting from increased fuel consumption, additional vessel wear and tear, additional crew remuneration and lost income due to longer non-fishing trips). In practice, this is expected to affect only larger vessels over 12 metres in length.

For small vessels below 12 metres in length, this Component primarily compensates for possible disruptions to fishing activities in the coastal zone, including in the fishing grid squares where the power export cables are located.

Only vessels entered in the fishing vessel register as of 31 December 2025 and operated during the compensation period will be taken into account, i.e. vessels holding both a valid fishing licence and a special fishing permit for each calendar year covered by the compensation.

## 6.2 Compensation Calculation Methodology

### 6.2.1 Compensation for Lost Income

Calculations of compensation for loss of income are based on official data from the Fisheries Monitoring Centre (CMR) on the best recorded fish catches in the Project area during the eligibility period 2018–2025, for each vessel length category of commercial fishing vessels. For vessels up to 12 metres in length (without a VMS system), data from fishing logbooks have been used, while for vessels over 12 metres in length (equipped with VMS) the calculations rely on VMS data.

In the calculations, only vessels entered in the fishing vessel register as of 31 December 2025 have been taken into account.

In the calculations of the annual catch values, the average prices of individual fish species in 2025 have been used, based on CMR data as of 2 April 2026.

From the obtained best-catch values, the maximum value was selected for each of the two fishing vessel length groups: up to 11.99 metres in length and over 12 metres. The final compensation amount for loss of income was rounded up in favour of the beneficiaries (Table 6-1).

**Table 6-1 Maximum Catch Values and Compensation for Loss of Income (2018-2025)**

| Port of Registration | Vessels Length | Year of the Best Catches [PLN] | Value of the Best Catches [PLN] | Compensation Amount [PLN] |
|---|---|---|---|---|
| DEB | 0 - 7,99 m | 2018 | 1,449 | 13,400 |
| UST | 08 - 11,99 m | 2018 | 13,321 | 13,400 |
| UST | 12 - 17,99 m | 2020, 2018 | 6,399 | 12,000 |
| ŁEB | 18 - 23,99 m | 2019, 2018 | 11,974 | 12,000 |
| WŁA | 24 m and above | 2021, 2022 | 2,059 | 12,000 |

*Source: Sotis/MIR, April 2026*

### 6.2.2 Compensation for Other Disruptions to Fishing Activities

This component has been determined on the basis of the "other disruptions" amounts established under the compensation mechanism for the construction phase of the Baltic Power offshore wind farm (C-TCM) for each vessel length category (0–7.99 m, 8–11.99 m, 12–17.99 m, 18–23.99 m, 24–39.99 m and over 40 m in length). When determining the corresponding amounts under the O-CM mechanism, an adjustment based on the inflation rate has been applied (Table 6-2):

**Table 6-2 Amounts for 'Other Disruptions' under the C-TCM and the O-CM**

| Vessels Length | Compensation Amount for Other Disruptions in C-TCM [PLN] | Compensation Amount for Other Disruptions* in O-CM [PLN] |
|---|---|---|
| 0 - 7,99 m | 6,000 | 6,500 |
| 08 - 11,99 m | 7,500 | 8,100 |
| 12 - 17,99 m | 15,000 | 16,100 |
| 18 - 23,99 m | 22,500 | 24,200 |
| 24–39.99 m | 30,000 | 32,200 |
| 40 m > | 36,000 | 38,700 |

* amount after application of inflation rate of 3.6% for 2 consecutive years.
*Source: Sotis, April 2026*

As indicated above, "other disruptions" are understood to include, inter alia, additional costs resulting from the extended route of fishing vessels to and from fishing grounds located to the north of the Baltic Power offshore wind farm (as further detailed below), as well as disruptions to the fishing activities of smaller vessels in the coastal zone, including in the fishing squares where the power export cables are located. Note that the additional compensation provided for under Table 6-2 above and Table 6-4 below is a one-off payment to be paid annually.

**Calculating Additional Operational Costs**

Within the calculations of additional operational costs resulting from the need to bypass the operating BLP offshore wind farm on the way to and from fishing grounds located further north, four elements have been taken into account: increased fuel consumption, increased vessel wear and tear, additional crew working time and lost income due to longer non-fishing trips (Table 6-4).

Calculations of the costs of the extended route to and from the fishing grounds have been carried out for all vessels over 12 metres in length, operating in the above-mentioned fishing grounds, departing from the three affected ports (Ustka, Łeba and Władysławowo) in the period 2018–2025. In these calculations, VMS data have been used to determine the number of transits through the offshore wind farm area.

**Table 6-3 Calculation Formulas for Additional Operational Cost Components**

| Elements of Compensation for Additional Operational Costs | Calculation Formulas |
|---|---|
| Additional fuel costs - **Rf** | $R_f = 0.185 * \frac{d}{11} * p * M * trips$<br>0,185 - average fuel consumption (kg per 1 kW of engine power of the vessel)<br>11 - average vessel speed to the fishing grounds (km/h)<br>d - length of the extended bypass route (km)<br>p - price of 1 kg of marine fuel in PLN, amounting to PLN 5.70/kg (data as at 2 April 2026, OKTAN Energy)<br>M - engine power of the vessel (kW) |
| Increased wear and tear of the fishing vessel - **Rz** | $Rz = W * 0.00000799 * t * trips$ |

| Elements of Compensation for Additional Operational Costs | Calculation Formulas |
|---|---|
| | W – value of the fishing vessel [34]<br>t - extended time needed to bypass the OWF<br>0,00000799 - annual depreciation rate of 7% divided by the number of hours in a year (8760 h) |
| Additional wage costs resulting from the extended time needed to bypass the wind farm - **Rw** | $Rw = S*t*Z_d*trips$<br>S - hourly wage rate (based on the average monthly wage according to Statistics Poland data for February 2026 amounting to PLN 9,135, i.e. PLN 57 per hour)<br>t - extended time needed to bypass the OWF<br>Zd - number of crew members |
| Lost income due to the extended trip to the fishing grounds - **Ru** | $Ru=\frac{I}{t_c} * t_d * trips$<br>I - annual catch of the vessel in a given year (in constant 2025 prices for the entire period)<br>tc - total fishing time spent at sea in a given year<br>$t_d$ - extended time needed to bypass the OWF |

*Source: Sotis/MIR, March 2026*

The above formulas were used to estimate the additional operating costs incurred by fishing vessel operators due to the longer transit to and from the fishing grounds, resulting from the cumulative impacts on fisheries identified in the Supplementary Socio-economic Impact Assessment and Cumulative Socio-economic Impact Assessment Report (Table 6-5). These costs are covered by the compensation amounts allocated to "other disruptions", as presented in Table 6-2.

**Table 6-4 Additional Operating Costs Due to Extended Transit to Fishing Grounds**

| Port of Registration | Vessels Length | Additional Operating Costs [PLN] |
|---|---|---|
| DEB | 0 - 7,99 m | - |
| UST | 08 - 11,99 m | - |
| UST | 12 - 17,99 m | 739 |
| ŁEB | 18 - 23,99 m | 10,210 |
| WŁA | > 24 m | 2,137 |

*Source: Sotis/MIR, April 2026*

## 6.3 Compensation Amounts under the OCM

The table below presents the annual compensation amounts applicable during the operational phase for individual commercial fishing vessel length categories with a fishing history in the area affected by the Project during the period 2018–2025.

[34] For the purpose of determining the value of the vessel, the compensation rates applicable under the 2021–2027 Operational Programme "European Funds for Fisheries" were adopted, specifically under Measure 1.7 Permanent cessation of fishing activities – scrapping or conversion of a fishing vessel.

**Table 6-5 Annual Compensation Amounts by Vessel Size Category**

| Vessels Length | Fish Catches Compensation | Other Disruptions (Infl. 3.6% applied) | Total Annual Compensation Amount per Vessel |
|---|---|---|---|
| 0–7.99 m | 13,400 | 6,500 | 19,900 |
| 08–11.99 m | 13,400 | 8,100 | 21,500 |
| 12–17.99 m | 12,000 | 16,100 | 28,100 |
| 18–23.99 m | 12,000 | 24,200 | 36,200 |
| 24–39.99 m | 12,000 | 32,200 | 44,200 |
| > 40 m | 12,000 | 38,700 | 50,700 |

*Source: Sotis, April 2026*

## 6.4 Eligibility

The categories of affected persons who will be eligible to receive compensation or additional support (i.e., the eligible groups) are as follows:

- the operators of commercial fishing vessels (namely those measuring 0 to 8, 8 to 12, 12 to 18, 18 to 24, 24 to 40 and over 40 metres in length) who report fishing in the maritime areas affected by the Project in the period 2018 to 2025 (to be confirmed by official data on commercial fishing held by the MIR);
- crew members who work on commercial fishing vessels (irrespective of vessel length); and
- crew members who lose / have lost their job, who worked on commercial fishing vessels that report fishing in the maritime areas affected by the Project in the period 2018 onwards (to be confirmed by official data on commercial fishing held by the MIR), and who can demonstrate that they were employed as a full-time crew member for at least six months in the period 2018 onwards, attached to one vessel (based on evidence provided by the individual crew member and their employer).

## 6.5 Entitlements Matrix

An overview of the entitlements to be offered to the groups is presented in Table 6-6, broken down by type of impact and eligible group.

**Table 6-6 Entitlements Matrix**

| Assets | Specifications | Eligible Displaced People / Entities | Entitlements |
|---|---|---|---|
| *Operators of the Commercial Fishing Vessels with Documented Catches in the Project Area* | | | |
| Potential reduction in income and increased operating costs | Potential reduction in income and increased operating costs due to the prohibition of livelihood activities within the maritime areas affected by the Project (i.e., OWF, cable corridor and corresponding safety areas) during the operational phase | Operators of commercial fishing vessels measuring 0 to 8 metres in length who report fishing in the maritime areas affected by the Project in the period 2018 to 2025 | 19,900 PLN per vessel per year, up to three years.<br>Compensation is based on lost revenue, coupled with an additional detour cost (to cover e.g. fuel and maintenance, based on vessel size).<br>The reference level of lost income was determined on the basis of fishing revenues in the best year in the period 2018–2025, with, in each of the two fishing vessel length groups (up to 12 m and over 12 m), the operator with the highest official catch values taken as the benchmark for the respective reference group. |
| | | Operators of commercial fishing vessels measuring 8 to 12 metres in length who report fishing in the maritime areas affected by the Project in the period 2018 to 2025 | 21,500 PLN per vessel per year, up to three years.<br>Compensation is based on lost revenue, coupled with an additional detour cost (to cover e.g. fuel and maintenance, based on vessel size).<br>The reference level of lost income was determined on the basis of fishing revenues in the best year in the period 2018–2025, with, in each of the two fishing vessel length groups (up to 12 m and over 12 m), the operator with the highest official catch values taken as the benchmark for the respective reference group. |

| Assets | Specifications | Eligible Displaced People / Entities | Entitlements |
|---|---|---|---|
| | | Operators of commercial fishing vessels measuring 12 to 18 metres in length who report fishing in the maritime areas affected by the Project in the period 2018 to 2025 | 28,100 PLN per vessel per year, up to three years.<br><br>Compensation is based on lost revenue, coupled with an additional detour cost (to cover e.g. fuel and maintenance, based on vessel size).<br><br>The reference level of lost income was determined on the basis of fishing revenues in the best year in the period 2018–2025, with, in each of the two fishing vessel length groups (up to 12 m and over 12 m), the operator with the highest official catch values taken as the benchmark for the respective reference group. |
| | | Operators of commercial fishing vessels measuring 18 to 24 metres in length who report fishing in the maritime areas affected by the Project in the period 2018 to 2025 | 36,200 PLN per vessel per year, up to three years.<br><br>Compensation is based on lost revenue, coupled with an additional detour cost (to cover e.g. fuel and maintenance, based on vessel size).<br><br>The reference level of lost income was determined on the basis of fishing revenues in the best year in the period 2018–2025, with, in each of the two fishing vessel length groups (up to 12 m and over 12 m), the operator with the highest official catch values taken as the benchmark for the respective reference group. |
| | | Operators of commercial fishing vessels measuring 24 to 40 metres in length who report fishing in the maritime areas affected by the Project in the period 2018 to 2025 | 44,200 PLN per vessel per year, up to three years.<br><br>Compensation is based on lost revenue, coupled with an additional detour cost (to cover e.g. fuel and maintenance, based on vessel size). |

| Assets | Specifications | Eligible Displaced People / Entities | Entitlements |
|---|---|---|---|
| | | | The reference level of lost income was determined on the basis of fishing revenues in the best year in the period 2018–2025, with, in each of the two fishing vessel length groups (up to 12 m and over 12 m), the operator with the highest official catch values taken as the benchmark for the respective reference group. |
| | | Operators of commercial fishing vessels measuring over 40 metres in length who report fishing in the maritime areas affected by the Project in the period 2018 to 2025 | 50,700 PLN per vessel per year, up to three years.<br>Compensation is based on lost revenue, coupled with an additional detour cost (to cover e.g. fuel and maintenance, based on vessel size).<br>The reference level of lost income was determined on the basis of fishing revenues in the best year in the period 2018–2025, with, in each of the two fishing vessel length groups (up to 12 m and over 12 m), the operator with the highest official catch values taken as the benchmark for the respective reference group. |
| *Crew members of Commercial Fishing Vessels* | | | |
| Potential reduction in income | Potential reduction in income due to secondary effect of vessel not able to operate within the maritime areas affected by the Project | Crew members of eligible commercial fishing vessels | Access to a targeted community programme, consisting of:<br>• an online portal providing information about the OWF industry and vacancies within the OWF sector; and<br>• an online English language training programme. |

| Assets | Specifications | Eligible Displaced People / Entities | Entitlements |
|---|---|---|---|
| Potential reduction in income | Potential reduction in income due to establishment of safety areas for the Project (and other external factors) | Crew members of eligible commercial fishing vessels who lose / have lost their job on the vessel, who can demonstrate that they were employed as a full-time crew member attached to the respective vessel for at least six months in the period 2018 onwards | Access to transitional support, namely a re-skilling programme focused on working within the offshore wind sector (e.g., guard vessel crew training).<br>Access to financial compensation, namely a one-off compensation pay-out in the amount of three times the monthly national minimum wage in Poland. |
| Additional support | Additional support for vulnerable persons whose livelihoods are negatively affected by the Project | Individual assessment of vulnerability and impact | Individual approach based on where the Project could provide support. The approach to supporting vulnerable persons is consistent with the principles described in Section 6.8 of the Construction Phase LRP. |

As indicated in the Entitlements Matrix (Table 6-6):

- The operators of commercial fishing vessels will be eligible to receive compensation from BLP. In order to access such compensation, commercial fishing vessels must have been active in the maritime areas affected by the Project (i.e., within the physical footprints of the OWF and sub-sea export power line cable corridor and their corresponding safety areas). This will be verified by BLP by checking official data on commercial fishing vessel movements and activities held by the MIR from the years 2018 to 2025. The vessel operators must also be able to provide proof of having the current means to conduct commercial fishing activities (for example, their vessel registration and fishing licence).
- The crew members of commercial fishing vessels - including those who are potentially vulnerable - will be eligible to receive additional support from BLP. Further details of such support are set out in Sections 6.4 to 6.6 and 6.8 of the Construction Phase LRP (2024).

During the implementation of the OCM, the provisions of Sections 6.4 to 6.6 and 6.8 of the Construction Phase LRP (2024) shall apply only to the extent that they are consistent with the scope, eligible stakeholder groups, eligibility criteria and temporal coverage of this Update, excluding any provisions relating to recreational fishers (marine tourism vessels).

In relation to additional support, it should be noted that no applications for compensation were submitted during the period of application of the C-TCM. The lack of interest in this form of support among eligible persons may indicate that the impact of the construction phase on fishers' livelihoods has been limited. Nevertheless, BLP intends to maintain this instrument in case any claims arise in the future; therefore, the solution developed under the C-TCM is retained for the operational phase, under the OCM.

The Entitlements Matrix (Table 6-6) does not reference potential accidental damages to commercial fishing vessels, alongside fishing equipment, due to the movements and / or activities of Project vessels as such damages are regarded as risks rather than impacts. Should such damages occur during the Project's operational phase, however, compensation will be provided in accordance with the provisions of Section 6.9 of the Construction Phase LRP (2024).

**Additional information on the OCM**

The OCM has been developed for the operational phase of the Baltic Power OWF for a period of three years; however, this period may be shortened if relevant government regulations concerning compensation are developed and enter into force. In such circumstances, BLP will review the government mechanism against its own OCM. Where that review determines that higher compensation amounts would be payable under the government mechanism, BLP will pay the difference to persons who have already received compensation under the OCM. Where the review determines that lower compensation amounts would be payable under the government mechanism, BLP will take no further action, and persons who have already received compensation will not be required to repay any part of the amounts received. Upon the entry into force of the government mechanism, it will replace the OCM, and all persons who become eligible for compensation from BLP thereafter will receive such compensation in accordance with the government mechanism.

For the Project's operational phase, three annual compensation periods will be established (2027, 2028 and 2029). Applications for compensation will be accepted during the first three months of each year, but no later than the expiry of the three-year OCM implementation period or the entry into force of a government compensation mechanism, whichever occurs earlier. Vessel operators will, however, be encouraged to submit their applications as early as possible within each compensation period.

BLP is committed to reviewing compensation applications within 60 working days of receipt, and to paying compensation within 60 working days of the applications having been reviewed. Formal approval / acceptance of the application will be communicated to each vessel operator in writing within 60 working days of receiving the application. Where necessary, additional information / documentation may be requested from vessel operators to facilitate the review of their applications.

The compensation amounts specified are net of Value Added Tax (VAT) and will be increased, if applicable, by VAT at the appropriate rate.

Within six months of the entry into force of the government mechanism, vessel operators who have received compensation from BLP shall decide and notify BLP whether they:

- will re-apply for compensation under the government mechanism; in such a case, BLP shall pay the difference between the amount paid under the BLP compensation methodology and the amount payable under the government methodology, provided that the latter amount is higher; or
- accept the compensation paid by BLP as final and waive any rights to seek further compensation under the government mechanism for the relevant period.

If no decision is made and/or communicated to BLP within the above period, the vessel operators shall be deemed to have accepted the compensation paid by BLP as final, waived any right to further compensation for the relevant period, and agreed not to pursue any further compensation from BLP for the given period.

# 7. STAKEHOLDER ENGAGEMENT

## 7.1 Summary of Past Stakeholder Engagement Activities

### 7.1.1 Engagement Within the Framework of the Construction Phase Livelihood Restoration Plan

Stakeholder engagement undertaken with the framework of the Construction Phase Livelihood Restoration Plan (LRP) has been aimed at supporting the rollout of the LRP (including compensation related processes and maintaining an ongoing dialogue with those groups whose livelihoods are most closely linked to the maritime areas affected by the Project (in particular commercial fishers).

As reflected in Baltic Power's stakeholder engagement reporting, Baltic Power has maintained regular engagement with fishers, including quarterly meetings in three key affected ports of Ustka, Łeba and Władysławowo.

In addition, BLP has continued to maintain a project-level system for tracking and reporting stakeholder issues and grievances during construction.

Where relevant, engagement activities undertaken within the LRP framework have been supported by established documentation and reporting processes (including ongoing stakeholder engagement reporting and associated appendices/evidence logs reference in the stakeholder engagement reporting structure described in Doc. No. BLP-PMT-PMT-PLN-00004 Implementation and Reporting of Stakeholder Engagement Plan).

### 7.1.2 Broader Engagement by Baltic Power During the Construction Phase

In parallel with LRP specific engagement, BLP has implemented broader construction phase stakeholder engagement and communications activities through its Implementation and Reporting of Stakeholder Engagement Plan and monthly project reporting.

BLP's SEP implementation reporting for the period April 2025 to April 2026, documents ongoing engagement with local community stakeholders in areas affected by the Project. The engagement has included regular meetings with municipal authorities and community representatives in key affected areas (including Łeba and Choczewo), consultation on construction progress, traffic safety measures, future utilisation of project infrastructure (including service roads and cable route development), and engagement with local organisations supporting community initiatives.

Communication activities have encompassed educational content and information dissemination to affected communities. Stakeholder engagement remains an ongoing activity throughout the Project life-cycle, with BLP committed to maintaining regular communication and consultation with affected communities and interest groups.

## 7.2 Stakeholder Engagement and Information Disclosure Requirements for Supplemental Livelihood Restoration Plan

This Plan is being prepared using available construction phase engagement records. This Plan thus builds on the engagement undertaken during construction including quarterly fisheries meetings and broader SEP implementation and the monitoring and reporting systems already applied by BLP during construction (including routine reporting and grievance tracking).

Prior to finalisation, BLP has confirmed its intention to disclose this Plan for consultation for a defined period on BLP's website, to allow stakeholders to provide comments prior to finalisation. This disclosure period is intended to provide an opportunity for feedback from stakeholders, including the commercial fishing sector, as well as relevant authorities and other interested parties, consistent with the approach applied under the broader Stakeholder Engagement Plan implementation and reporting arrangements.

Following finalisation and through implementation, stakeholder engagement and information disclosure will continue to be undertaken, building on established construction-phase practices, including:

- Continuation of structured engagement with fisheries stakeholders, recognising the established practice of regular periodic meetings in the key ports (Łeba, Ustka, Władysławowo), which will be held on an annual basis during the operational phase, and the use of these meetings to provide updates on: offshore works progress, vessel activity, safety considerations, compensation status and processes, and support measures.
- Ongoing disclosure of relevant operational information, including (as relevant to livelihoods and access) such as safety/exclusion arrangements, vessel activity profiles and port usage, and any confirmed updates to eligibility/ entitlements and compensation processes, using channels as per the SEP implementation and reporting. Where relevant, disclosure should clarify that navigation in safety zones is currently prohibited except for specified vessel categories (e.g. state administration, anti-pollution, distress, project/ O&M and environmental data collection), and that other access would require consent issued by the Director of the Maritime Office in Gdynia.
- Ongoing logging and reporting including continued use of BLP's established reporting tools (e.g. SEP implementation reporting and routine project reporting) to evidence engagement activities, key issues raised, and follow up actions, as well as continued track and reporting of grievances.

# 8. IMPLEMENTATION

This chapter outlines the arrangements for implementing the Plan, inclusive of roles and responsibilities, an indicative timeline, and the process for managing grievances that may arise during implementation. The stakeholder engagement and information disclosure activities to be undertaken during implementation are described in Chapter 7.

## 8.1 Roles and Responsibilities

The roles and responsibilities for implementing the Plan will be built on construction phase arrangements but will be updated to reflect the transition to operations. The Plan will be implemented by the O&M team, with personnel responsible for the execution of the compensation mechanism and stakeholder communication. Relevant operational roles include a Stakeholder Manager and Environmental, ESG and Quality Manager, who will also cover the ESG scope. BLP is also planning to assign a dedicated Communication Manager. The Stakeholder Manager, supported by the Communications Manager, retains responsibility for regular engagement with affected fishers and other stakeholders, for maintaining the Project grievance log, and for reporting to the LIESC on the process of resolution of concerns and/or complaints, including but not limited to those of a livelihood restoration focus, in line with ESAP item 5.1.

**Table 8-1 Roles and Responsibilities for SLRP Implementation**

| Role | Responsibilities |
|---|---|
| *Internal to BLP* | |
| BLP Company Management Board | • Approval of the compensation approach and additional support (i.e., targeted community programme) discussed in the Plan<br>• Ensuring that sufficient resources (human and financial) are available for implementing the Plan |
| BLP Environmental, ESG and Quality Manager | • Raising awareness about the Plan internally, ensuring that all relevant teams and departments are informed about and understand its requirements<br>• Monitoring the status relevant regulatory developments relating to fisheries compensation/ co-existence, and identifying any corrective actions required to align the Plan approach once requirements are clarified.<br>• Arranging for any training and capacity building that may be required internally to ensure that the Plan can be implemented effectively<br>• Monitoring the implementation of the Plan internally, as well as reporting on the outcomes of internal monitoring<br>• Undertaking a completion audit to confirm whether Plan implementation has been successfully concluded<br>• Preparing a completion audit report on the findings of the completion audit which includes, within its scope, any corrective actions necessary to effectively conclude Plan implementation |
| BLP Communications Manager | • Day to day coordination of Plan implementation, inclusive of internal coordination across functions (ESG, O&M, Communications, Legal, Finance) and external interfaces (as relevant)<br>• Coordinating the implementation approach (including whether supported by an external advisor) and the implementation timeframe, noting these are to be confirmed.<br>• Maintaining the Plan implementation tracker/log and supporting lender facing reporting audit interfaces as required. |
| BLP Stakeholder Manager | • Carrying out stakeholder engagement and information disclosure activities during Plan implementation, ensuring that all such activities are formally logged and documented (considering national requirements for data protection)<br>• Managing grievances which are received during Plan implementation via the Project's external grievance mechanism<br>• Maintaining the Project grievance log and reporting to the LIESC on the process of resolution of concerns and/or complaints, including but not limited to those of a livelihood restoration focus, thereby continuing the CLO function established during the construction phase<br>• Continuing to build and maintain relationships with key external stakeholders, in particular members of the local fishing industry, alongside local communities<br>• Leading (or coordinating) the operational implementation livelihood restoration measures under the Plan, including any compensation arrangements once defined. |

| Role | Responsibilities |
|---|---|
| | • Acting as key points of contact for the operators and crews of commercial fishing vessels during Plan implementation<br>• Assisting the Plan implementation teams with stakeholder engagement and information disclosure activities during Plan implementation, in particular in terms of preparing materials (e.g., leaflets, presentations, notices, online articles / texts, newspaper entries) |
| BLP Finance Department | • Facilitating the payment of compensation, once the corresponding applications have been reviewed and agreed through the Plan process (administrative arrangements to be confirmed) |
| BLP Legal Team | • Providing expert advice to other teams / departments within BLP, regarding any legal matters that may arise during Plan implementation<br>• Assisting with the resolution of legal disputes / claims (e.g., related to compensation), should these arise during Plan implementation |
| *External to BLP* | |
| Sotis Advisors | • Providing technical support and/or administration of the compensation process, including receiving and reviewing compensation applications submitted by the operators of commercial fishing vessels<br>• Liaising with compensation applicants to obtain further information / documentation and seek clarifications, as required, supported by the BLP Stakeholder Manager<br>• Approving the compensation applications, and communicating formal approval / acceptance of the applications to vessel operators in writing<br>• Organising the payment of the corresponding compensation with BLP<br>• Following up with the BLP to confirm that the payments have been made<br>• Managing all information and documentation relating to compensation applications, considering national requirements for data protection, in a secure compensation database[35] |
| Operators of commercial fishing vessels | • Participating in stakeholder engagement meetings such that they can be informed about operational activities for the OWF and sub-sea export power line cable corridor, operational restrictions/ safety arrangements (as applicable and as communicated by the relevant authorities/BLP)<br>• Observing the rules which are applicable to the operational safety/exclusion zones (as applicable) areas surrounding the OWF and cable corridor during their establishment and planning fishing activities accordingly.<br>• Submitting applications for compensation (as applicable), providing all required information and documentation required to support the application, where they believe that they are eligible to receive compensation<br>• Liaising with representatives of Sotis Advisors, as required, to support the processing of the application<br>• Using the Project's external grievance mechanism to report any concerns that they may have with regards to the Project |

[35] The compensation process will thus need to be administered by BLP with external consultancy support from Sotis Advisors, pending the establishment of any government mandated compensation body.

| Role | Responsibilities |
|---|---|
| | • Marine tourism vessel operators are not entitled to compensation during the O&M phase, having received a one-off compensation payment during the construction period, covering both the construction and operational phases. |
| Crew members of commercial fishing vessels | • Participating in stakeholder engagement activities such that they can be informed about the operational activities, operational restrictions/ safety arrangements (as applicable), and the Plan measures (including any additional support).<br>• Observing the rules which are applicable to the safety areas surrounding the OWF and cable corridor during their establishment and planning fishing activities accordingly.<br>• Participating in the targeted community programme that will be offered within the framework of this Plan, provided they are eligible and willing.<br>• Using the Project's external grievance mechanism to report any concerns that they may have with regards to the Project. |
| Members of local fishing groups and associations | • Participating in stakeholder engagement activities such that they can be informed about operational activities, operational restrictions/safety arrangements (as applicable), the Plan measures (including any compensation process) and so forth<br>• Relaying the information provided during stakeholder engagement activities to other members of their groups / associations, thereby helping to disseminate this information more widely<br>• Using the Project's external grievance mechanism to report any concerns that they may have with regards to the Project |
| Department of Fisheries (of the Ministry of Agriculture and Rural Development)<br>Commune Administrations<br>Port Authorities (Ustka, Łeba and Władysławowo)<br>Authorities of Neighbouring Ports | • Participating in stakeholder engagement activities such that they can be informed about the operational activities, operational safety/exclusion arrangements and corresponding rules, alongside the Project's approach to livelihood restoration, grievance management so forth<br>• Relaying the information provided during stakeholder engagement activities to those who own or work on commercial fishing vessels, if approached, thereby helping to disseminate this information more widely<br>• Sharing details about the Project's external grievance mechanism, should grievances be expressed to them by those who own or work on commercial fishing vessels |
| Organisations that may assist BLP with the implementation of the targeted community programme[36] | • Assisting BLP with the implementation of the targeted community programme<br>• Engaging with those individuals who are eligible to receive additional support through the programme and choose to access such support<br>• Documenting the various activities that are undertaken on behalf of BLP as part of the targeted community programme for future monitoring purposes |

[36] Note that the requirement for the involvement of such organisations is subject to the further development of the programme and the types of measures to be included within it.

| Role | Responsibilities |
|---|---|
| Lenders' Independent Environmental and Social Consultant | • Undertaking compliance reviews to verify whether the implementation of livelihood restoration measures complies with the provisions of the Plan, alongside Lender requirements and applicable ministerial regulations once adopted<br>• Preparing reports on the outcomes of the compliance reviews which include, within their scope, any corrective actions that should be undertaken<br>• Verifying progress towards the implementation of corrective actions (where specified) during the subsequent compliance review |

## 8.2 Timeline

The implementation of the Plan will involve several overlapping activities including continued monitoring of livelihoods, engagement with affected stakeholders, and periodic evaluation of livelihood outcomes.

## 8.3 Grievance Management

During the operational phase, external stakeholders (including fishing operators and local communities) may continue to raise grievances related to ongoing Project activities.

Grievances will be managed in accordance with the Project's external grievance mechanism, which remains unchanged from the Construction Phase. The mechanism provides multiple channels for submission (Stakeholder Manager contact, email, and local complaint points) and ensures each case is tracked from receipt through resolution and close-out. The Project grievance log will be maintained by the Stakeholder Manager, who will report to the LIESC on the process of resolution of concerns and/or complaints, including those with a livelihood restoration focus.

A summary of this process is provided in Figure 8-2 of the Construction Phase LRP, and full procedural details are outlined in the Project's Stakeholder Engagement Plan (SEP) and Grievance Mechanism (GM) documentation.

# 9. MONITORING AND EVALUATION FRAMEWORK

This chapter outlines the internal and external monitoring and evaluation activities that will be undertaken to track the implementation of the Plan and to verify whether the measures defined in the Plan are effectively managing any potential residual or ongoing economic displacement impacts of the Project and supporting the sustained restoration of affected livelihoods.

## 9.1 Objectives

Monitoring and evaluation are essential components of the Plan as they enable BLP to verify whether livelihood restoration measures implemented during operations continue to achieve their intended outcomes during the operational phase. Monitoring and evaluation will also allow BLP to confirm that the Plan remains responsive to any residual or new livelihood impacts that may emerge during operations.

Some of the key objectives of monitoring and evaluation are as follows:

- to provide a regular assessment of Plan implementation activities and their outcomes;
- to provide BLP, amongst other parties (e.g., the affected persons, the Project's financing parties), with timely information about whether entitlements are being delivered in accordance with the Plan;
- to verify whether the entitlements defined in the Plan are effective in helping the livelihoods of the affected persons to be restored, in particular those who are vulnerable;
- to ensure that grievances reported via the Project's External Grievance Mechanism are being managed in an effective and timely manner; and
- to monitor the status of the relevant regulatory developments relating to fisheries compensation/co-existence.

## 9.2 Internal Monitoring

Internal monitoring will remain an ongoing activity undertaken primarily by BLP on an annual basis for the duration of the Plan. The purpose of internal monitoring is to track progress toward the achievement of livelihood restoration objectives and to confirm that all measures continue to function effectively during the operational phase.

Internal monitoring will consist of performance monitoring, which will focus on the delivery, timeliness, and effectiveness of any remaining Plan activities, including the administration of compensation, implementation of targeted community-support measures, and stakeholder-engagement and grievance-management processes. Internal monitoring will be limited to annual reports prepared against the eligibility matrix, prior to the LIESC annual monitoring audits for the operational phase. Monitoring results will be compiled in internal monitoring reports and shared with relevant internal and external stakeholders, including the Project's financing parties.

**Table 9-1 Internal Monitoring Indicators**

| Aspect | Indicator | Target | Frequency | Method |
|---|---|---|---|---|
| *Performance Monitoring* | | | | |
| Delivery of Entitlements (Compensation) | Number of compensation applications received | Not applicable | Annual | Review of compensation database |
| | Number of compensation payments made within 60 working days of review of applications (subject to approval) | All payments made within 60 working days of review of applications (subject to approval) | Annual | Review of compensation database |
| Delivery of Entitlements (Additional Support) | Implementation of targeted community programme to facilitate livelihood transition | Targeted community programme has been successfully established | Once | Review of correspondence between internal stakeholders |
| Stakeholder Engagement and Information Disclosure | Disclosure of Plan | Plan has been publicly disclosed | Once | Review of Project's website |
| | Meetings on additional support described in the Plan (i.e. compensation mechanism and targeted community programme) | Meetings have been held with those who work on commercial fishing vessels to inform the further development and design of both the compensation mechanism and targeted community programme; annual meetings held to maintain engagement. | Annual | Review of stakeholder engagement records |
| Grievance Management | Number of grievances of relevance to the Plan received | Negative trend in number of grievances received of relevance to Plan | Quarterly | Review of grievance database |
| | Number of such grievances which have been resolved and closed | All such grievances have been resolved and closed | Quarterly | Review of grievance database |
| Other | Review status of/or final version of ministerial regulations regarding fishery compensation (once available) against the interim compensation approach proposed in the Plan | Final ministerial regulations reviewed against interim compensation approach proposed in Plan | Once | Written confirmation that review of ministerial regulations against interim compensation approach has been completed |

| Aspect | Indicator | Target | Frequency | Method |
|---|---|---|---|---|
| | Corrective actions taken to ensure alignment between interim compensation approach and requirements of ministerial regulations and the Plan has been updated (if required) | All corrective actions have been taken and the Plan has been updated (if required) | Once | Written confirmation that all corrective actions have been taken (if required)<br>Updated Plan (if required) |
| | Review and update of Plan once decisions concerning the undertaking of livelihood activities in maritime areas affected by Project during operations have been made by Maritime Office in Gdynia and other relevant authorities | Plan has been reviewed and updated | Once | Updated Plan disclosed on BLP's website. |
| *Impact Monitoring* | | | | |
| Income Levels | Trend in income levels amongst those who have received compensation or additional support from BLP | Income levels have been maintained or are ideally improving, following the receipt of compensation or additional support | Once- Three years after start of Plan implementation | Survey of those who have received compensation or additional support from BLP to gather qualitative feedback on perceived changes in income levels. To be conducted once Plan is substantially implemented, as part of the Completion Audit. |
| Education and Skills | Obtainment of skills, qualifications and experience amongst those who have received additional support from BLP | Those who have received additional support from BLP have acquired additional skills, qualifications and experience | Once- Two years after start of Plan implementation | Survey of those who have received additional support from BLP. To be conducted once Plan is substantially implemented, as part of the Completion Audit. |

## 9.3 External Monitoring

External monitoring, in the form of compliance reviews, will be undertaken to verify whether the implementation of livelihood restoration measures under the Plan (including any operational compensation arrangements and other livelihood restoration support measures) complies with the provisions of the Plan, as well as with Lender requirements (as defined in Section 3.3)[37]. Such external monitoring will also provide insights into the performance of BLP in implementing the Plan and highlight the need for any additional resource or capacity building.

The Lenders' Independent Environmental and Social Consultant (LIESC) will undertake the compliance reviews. External monitoring during operations is expected to continue through annual E&S monitoring audits. The compliance reviews will be undertaken on an annual basis for the duration of Plan implementation and until the completion audit confirms that Plan implementation has been successfully concluded. The detailed arrangements for external monitoring, including the frequency and duration of LIESC compliance reviews, will be confirmed with BLP once the measures and framework for fisheries compensation/co-existence have been agreed.

The compliance reviews will be informed by the outputs of ongoing internal monitoring (i.e., internal monitoring reports), alongside stakeholder engagement data, grievance data and the socio-economic baseline data presented in Chapter 4. The LIESC may conduct site visits, during which independent surveys and engagements with relevant stakeholders (in particular the affected persons) may be performed.

The outcomes of the compliance reviews will be presented in formal reports that will be shared directly with BLP and other relevant entities (e.g., the Project's financing parties). Corrective actions will be recommended in the reports, as required, progress towards the implementation of which will be verified during the next compliance review.

## 9.4 Completion Audit

A completion audit shall be performed by BLP to confirm whether Plan implementation has been successfully concluded. In this context, whether the Plan has fulfilled its purpose and achieved its desired outcomes (i.e., to restore and, where possible, improve the livelihoods of the affected persons) will be assessed.

The completion audit will draw on the data generated during ongoing internal monitoring and the findings of the compliance reviews by the LIESC. Surveys of and engagement with a sample of the affected persons may be conducted as part of the completion audit (e.g., to learn about their level of satisfaction with the compensation and / or additional support received).

The completion audit will aim to:

- verify that all entitlements described in the Plan have been delivered, and to determine whether these measures have been effective in restoring and (where possible) improving the livelihoods of the affected persons (in particular those considered to be potentially vulnerable);
- check that any grievances pertaining to the livelihood restoration process have been satisfactorily resolved (or that adequate provision has been made for their resolution in the future); and
- identify any corrective actions to effectively conclude Plan implementation.

A Single Completion Audit Report will be prepared once the Plan is substantially implemented, after three years from the start of Plan implementation. The Completion Report will cover both the Construction Phase (LRP) and the Operational Phase (SLRP). The report will be shared by BLP with other relevant entities (e.g., the Project's financing parties) and publicly disclosed on BLP's website.

[37] Compliance with any applicable ministerial regulations will also be included in the scope of compliance reviews once the document has been finalised.

Should a large number of corrective actions be identified, a Corrective Action Plan (CAP) may be developed and appended to the report.