

BC-Wind Offshore Wind Farm Livelihood Restoration Plan

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BC-Wind Offshore Wind Farm

Livelihood Restoration Plan

PROJECT:

BC-Wind Offshore Wind Farm and the connection infrastructure to the National Power System.

Baltic Sea, Poland



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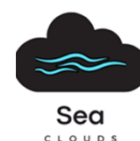


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Glossary of terms and abbreviations

AIS	Automatic Identification System (AIS)
Fishing squares under analysis	Fishing squares O6, O7, O8, P7 and P8, in the areas where the Project will be carried out
CMR	Fisheries Monitoring Centre
DŚ	Decision on Environmental Conditions
EIB	European Investment Bank
Economic resettlement	Loss of sources of income or livelihoods resulting from restricted access to an area or natural resources in connection with the implementation of the Project
GIRM	Main Inspectorate of Sea Fisheries
GUS	Central Statistical Office
HDD	Horizontal directional drilling (HDD)
ICES	International Council for the Exploration of the Sea
Investor	Ocean Winds, OW
IP	Connection infrastructure
kV	Kilovolt
LGD DŁ	Local Action Group 'Łeba River Basin'
LST	Onshore transformer station
MFW	Offshore wind farm
MSC	Marine Stewardship Council (MSC)
MST	Offshore substation
MW	Megawatt

EIA	Environmental Impact Assessment
Person affected by the Project	A person at risk of economic displacement caused by the implementation of the Project (operators and crew members of vessels used for commercial fishing and tourism)
PLGR	North Kashubian Local Fisheries Group
POM	Polish maritime areas
Project	BC-Wind offshore wind farm
PSE	Polish Power Grid (Transmission System Operator)
PZPPOM	Spatial Development Plan for Polish Maritime Areas
EU	European Union
WSE	Exclusive Economic Zone

SUMMARY

INTRODUCTION

This Livelihood Restoration Plan sets out how the Investor will identify, assess and compensate for the economic losses of individuals and entities whose activities will be restricted as a result of the construction of the Project.

The Plan covers the construction phase. It does not cover the operational phase of the Project, as the scope of restrictions on sea users within the wind farm area during its operation will only be specified in orders issued by the Director of the Maritime Office in Gdynia prior to the Project's commissioning.

The plan will be updated twice: before the start of operation and before the decommissioning of the Project begins. Each update will take into account the restrictions on maritime users applicable at the relevant stage.

The implementation of the Project does not involve the physical resettlement of people or expropriations. However, the construction of the offshore part of the Project may temporarily restrict commercial fishing and marine angling tourism activities and increase the operating costs of vessels, due to longer routes to fishing grounds. On this basis, the owners of commercial fishing vessels and operators of sea-based angling tourism vessels have been identified as those affected by the Project. This Plan relates exclusively to the offshore part of the Project. The Project's potential impacts on the onshore area and the relevant mitigation measures are described in the Stakeholder Engagement Plan.

THE PROJECT

Offshore wind farm (MFW) BC-Wind (Project), developed by C-Wind Polska Sp. z o.o., is a project comprising 26 wind turbines, an offshore substation with a total capacity of up to 390 MW, internal cables connecting the turbines to the offshore substation, and a power export cable to the mainland. On the onshore section, the electricity generated will be fed into the

national grid via an onshore transformer station and a 400 kV substation, operated by Polskie Sieci Elektroenergetyczne. The infrastructure in the offshore section will be located within the exclusive economic zone of the Polish Baltic Sea, in territorial waters and internal waters, as well as onshore within the municipality of Choczewo. Its location complies with Polish law and regulations, for which the project has obtained the relevant administrative decisions.

Construction work will take place between 2026 and 2028. Initial work began on the onshore part of the project in March 2026 (construction of the onshore substation and the export transmission cable) The final works, however, will be carried out in the offshore section (installation of wind turbines) in mid-2028. The expected operational life is approximately 30–35 years.

LEGAL FRAMEWORK

Neither international, EU nor national legislation provides for a standardised, mandatory compensation scheme for economic losses incurred by vessels in connection with the implementation of an offshore wind farm. However, in connection with the bans on cod fishing that have been introduced, a special EU fund has been set up aimed, amongst other things, at supporting fishermen, providing financial compensation for the permanent cessation of fishing activities and diversifying fishing activities.

As regards Polish legislation, these issues are to be resolved through the adoption of an amendment to the Act on the Promotion of Electricity Generation in the MFW. Under this amendment, the competent authority will be able to issue regulations setting out the method for verifying any losses, as well as the methods and scale of compensation for lost fishing opportunities, and the detailed conditions for carrying out commercial fishing in the MFW areas. At government level, consideration is also being given to introducing a State aid Act aimed at owners of commercial fishing vessels.

POTENTIAL IMPACT OF THE PROJECT

During construction within the marine part of the Project, the use of marine space will be restricted. This will result in a reduction in the area available for commercial fishing in certain parts of fishing squares O6, O7 (the area where the connection infrastructure (IP) is located) and O8 and P8 (the area where the MFW is located). In order to determine the impact on Polish fisheries, an analysis was carried out for the period 2016–2025 using data from fishing vessels' catch reports provided by the Fisheries Department of the Ministry of Agriculture and Rural Development – the Fisheries Monitoring Centre (CMR).

Restrictions on the use of space within the marine part of the Project will necessitate changes to vessel routes. In order to determine the potential impact on the lengthening of vessel routes, an analysis was carried out of data from fishing vessels' catch reports for the period 2016–2025, provided by the Fisheries Department of the Ministry of Agriculture and Rural Development – the Fisheries Monitoring Centre, as well as data from the Automatic Identification System (AIS) for the years 2017–2023 obtained from EMODnet Human Activities.

The report sets out a proposed methodology for compensating for disruption to fishing activities and recreational sea angling during the construction of the BC-Wind offshore wind farm, comprising:

1. Direct losses incurred by fishing vessels operating within the project area,
2. Longer travel distances to fishing grounds,
3. Disruption and losses suffered by organisers of recreational sea fishing trips.

PEOPLE AFFECTED BY THE PROJECT'S IMPLEMENTATION

As part of this study, groups of people potentially affected by the implementation of the Project – the BC-Wind offshore wind farm and its connection infrastructure – were identified, with particular emphasis on representatives of the commercial fishing sector. The

identification process was based on a spatial analysis of vessel data (see below), statistical data from the Central Statistical Office, the results of public consultations conducted by the Investor since 2021, and the results of a context analysis prepared by the Investor.

It was established that fishing activities are carried out primarily from the ports in Władysławowo, Łeba and Dębki (Krokowa municipality). On this basis, three municipalities (Władysławowo, Łeba and Krokowa) were identified as being directly affected by the economic impact of the Project and as being inhabited by people affected by the Project. An analysis of the socio-economic structure showed that the number of people professionally involved in fishing in these municipalities is relatively small – based, amongst other things, on data from fishing associations and the number of active vessels. At the same time, given this group's high sensitivity to changes in access to marine resources and marine space, it has been included within the specific scope of the assessment and compensation measures.

COMPENSATION SCHEME

The BC-Wind Project's compensation scheme relates to the construction phase, providing support for vessel owners and crew members of commercial fishing vessels operating between 2022 and 2025 in designated fishing squares. Following consultations with those affected by the scheme, the Investor plans to update the compensation scheme to take account of the views and concerns of the local community.

The amount of compensation will be calculated on the basis of actual catch data, average market prices, the area affected by the restrictions, and the duration of the restrictions associated with the construction of the offshore wind farm and the connection infrastructure. Compensation is also provided for extended voyage distances, and in the case of documented damage – compensation for damaged equipment.

PUBLIC CONSULTATION AND DISCLOSURE OF INFORMATION

Since 2021, the investor has maintained an ongoing dialogue with representatives of the fishing sector and other stakeholders, organising over 13 consultation meetings. This process

has enabled the perspectives of local communities to be taken into account in the structure of the compensation scheme and the development of the Livelihood Restoration Plan. Information on all meetings held to date is available in the Stakeholder Engagement Plan, which can be found on the project website. Further consultation meetings are planned, and all materials will be made available online and locally in municipalities and port authorities.

COMPLAINTS HANDLING MECHANISM

The project has an active complaints handling mechanism, which also includes a compensation scheme. There are four ways to get in touch: online, by telephone, by email and in person.

MONITORING AND EVALUATION

The Livelihood Restoration Plan will be subject to internal and external monitoring and evaluation. The main objective of these activities will be to verify whether this Plan effectively restores the lost sources of income of those affected by the Project and whether it complies with the agreed timetable and the Lenders' requirements. Internal monitoring will be carried out regularly throughout the Plan's implementation period by designated representatives of the Investor, whilst external monitoring will be carried out at regular intervals by Independent Environmental and Social Consultants as part of periodic reports to the Lenders.

The Independent Consultants will also carry out a final audit upon completion of the implementation of measures aimed at restoring sources of income. The audit will be carried out upon completion of the construction phase and upon completion of the implementation of the updated Plan for the Restoration of Sources of Income during the operational phase. Its aim will be to verify and to determine whether the provisions of this Plan and the Lenders' requirements have been successfully implemented.

OBLIGATIONS RELATING TO IMPLEMENTATION AND TIMETABLE

The persons responsible for implementing the Plan are the Investor's representatives listed in Table 8.1 (Table 9.1). The timetable for implementing the Plan provides for two rounds of

meetings with Stakeholder representatives in the third and fourth quarters of 2026, the call for compensation claims by the end of 2026, and the payment of compensation in the first quarter of 2027.

1. INTRODUCTION

This Livelihood Restoration Plan has been drawn up to ensure that any damage resulting from the implementation of the BC-Wind offshore wind farm (OWF) project, together with its connection infrastructure (the Project), during the construction phase is managed in accordance with Polish legislation and the Lenders' requirements.

The Project involves the construction of an offshore wind farm with a maximum total capacity of 390 MW, together with the connection infrastructure. This is Ocean Winds' first project in Poland, being carried out by the special purpose vehicle C-Wind Polska, and the project's origins date back to 2012. Its aim is to generate electricity using wind energy, a zero-emission, renewable energy source. The transmission of electricity to the National Power System will be carried out via connection infrastructure (CI) linking the offshore wind farm to an onshore substation, and subsequently to the 400 kV Choczewo substation, operated by Polskie Sieci Elektroenergetyczne – the operator of the National Power System.

The BC-Wind offshore wind farm is currently in the pre-construction phase and has obtained all necessary administrative decisions, including planning permission. The administrative decisions obtained include, amongst others, environmental decisions for the offshore wind farm and for the connection infrastructure. The environmental decision for the offshore wind farm was amended by a decision of the Regional Director for Environmental Protection on 1 July 2025.

The project has secured financing in the form of loans granted by a consortium of banks. In accordance with the definitions of potential Lenders, the Project falls within category 'A' projects, i.e. those which may have a significant adverse impact on the environment and society and/or various irreversible effects. The Lenders require that measures addressing the identified environmental issues be implemented and adhered to.

The implementation of the project will not involve any expropriations or the physical resettlement of people. The plots of land earmarked for the onshore connection infrastructure

(onshore substation and transmission cable) have been purchased by the Investor from private owners at market price, or the Investor has acquired the right to use land belonging to the State Treasury. It is, however, anticipated that the construction phase of the Project's offshore section may restrict the ability of those engaged in commercial fishing and marine angling tourism to carry out their activities.

Impacts on material assets, the use of water bodies for fishing, and maritime transport have been identified, analysed and subject to public consultation as part of the environmental impact assessment procedure for the BC-Wind offshore wind farm (Environmental Impact Assessment (EIA) Report, December 2024) and for the IP (EIA Report, August 2023). Potential social impacts on the onshore section have been addressed in the Stakeholder Engagement Plan, which also includes mitigation measures implemented in collaboration with other offshore wind farm investors as part of the 'Wind-Powered Municipality' programme, carried out in cooperation with the Municipality of Choczewo. The investor is also a party to bilateral agreements with the Municipality, under which other measures are being implemented for the benefit of the local community of the Municipality of Choczewo.

The potential impacts of the Project, identified during the environmental impact assessment process, were assessed as minor and negligible within the IP area in relation to the offshore wind farm (OWF) area. Furthermore, in the Stakeholder Engagement Plan for the construction of the BC-Wind offshore wind farm (January 2025), associations and fishing communities, as well as groups involved in transport and shipping, were identified as key stakeholders.

Consequently, owners of commercial fishing vessels and operators of sea-based angling tourism vessels have been identified as those potentially affected by the economic impacts of the Project's implementation. Consequently, this Livelihood Restoration Plan contains an analysis of the impact of the Project's implementation on the aforementioned groups and therefore relates exclusively to the offshore part of the Project.

As this document relates to the construction phase, any potential impacts associated with the Project's operational phase will be analysed in the Livelihood Restoration Plan dedicated to the operational phase, which will be updated to take account of potential restrictions on fishing and navigation, established on the basis of orders issued by the Director of the Maritime Office in Gdynia.

It should also be noted that the compensation scheme adopted in the Plan (Chapter 6) is of a transitional nature. Should a uniform compensation scheme, introduced by statute or by an implementing act, come into force, the compensation scheme defined in this document will be adapted in accordance with the provisions adopted.

2. PROJECT DESCRIPTION

2.1 Location

The BC-Wind offshore wind farm (OWF), together with its connection infrastructure, will be developed in the Baltic Sea and onshore – within the municipality of Choczewo. The offshore part of the Project will be situated within Poland's Exclusive Economic Zone (EEZ), in territorial waters and internal waters. Several other offshore wind farms are planned to be built nearby as part of Phases I and II of the development of offshore wind farms in Poland (Figure 2.1). These farms will cover an area of approximately 560 km² of the sea. Taking into account all offshore wind farms from Phase I (excluding the BC-Wind offshore wind farm), their total area will be approximately 969 km².

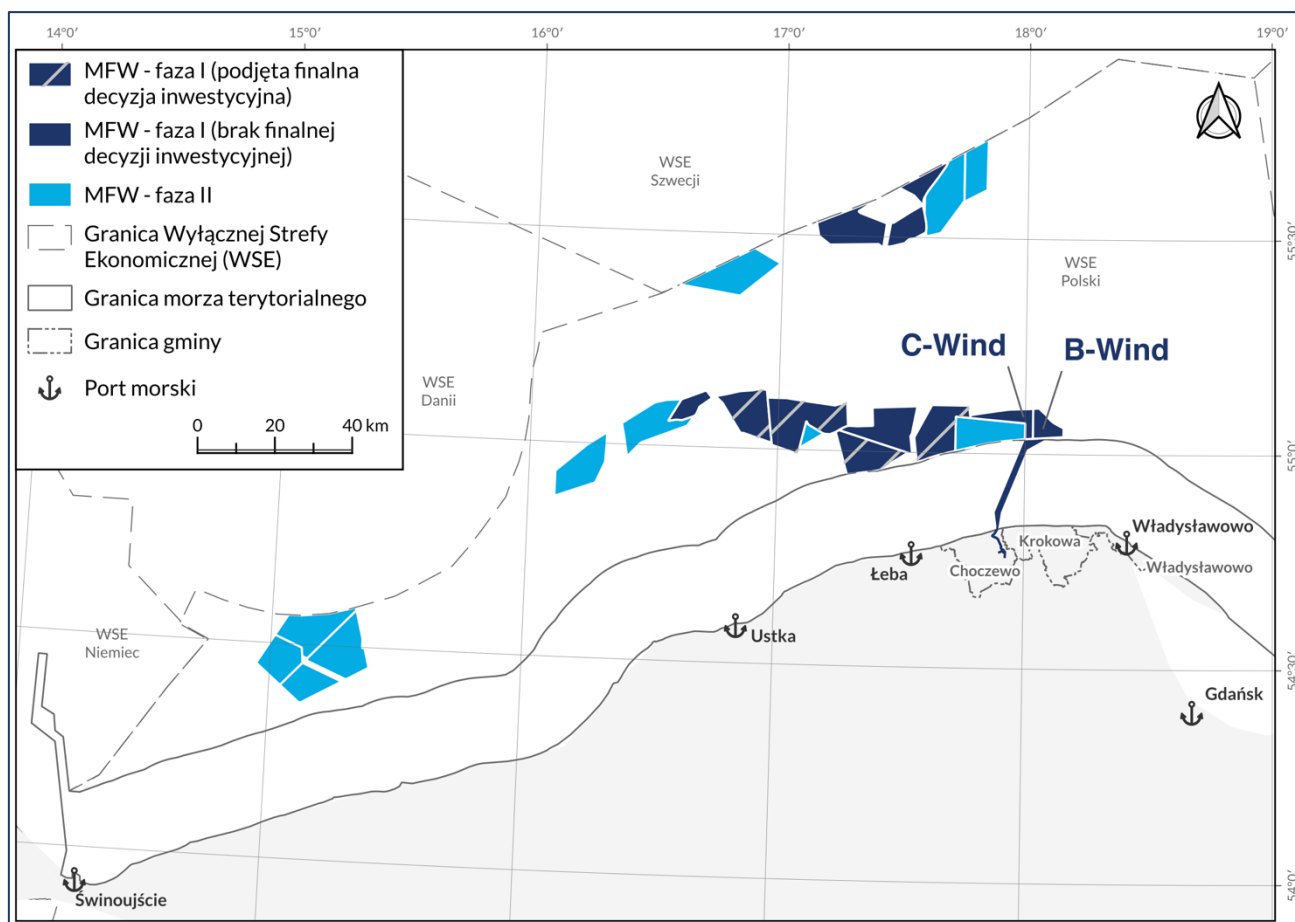


Figure2 .1 Location of the BC-Wind offshore wind farm in the Baltic Sea and on land

The offshore section of the project will be situated entirely within an area designated for the construction and use of artificial islands, structures and installations, in accordance with the Act of 21 March 1991 on the maritime areas of the Republic of Poland and maritime administration (Journal of Laws 2025, item 409). The location of the wind turbines and IP components in the offshore section is consistent with the Spatial Development Plan for Polish Maritime Areas (PZPPOM), adopted by the Regulation of the Council of Ministers of 14 April 2021 on the adoption of the spatial development plan for internal maritime waters, the territorial sea and the exclusive economic zone on a scale of 1:200,000 (Journal of Laws 2021, item 935). At the same time, in accordance with Annex 1 to the Act on the Promotion of Electricity Generation in Offshore Wind Farms of 17 December 2020 (Journal of Laws 2025, item 498), the BC-Wind offshore wind farm will be situated in Area 3 and Area 4 (within the boundaries of which offshore wind farms may be located, in respect of which the electricity

generator may apply for the right to offset a negative balance). In view of the above, the location of the Project complies with Polish law and regulations.

The BC-Wind offshore wind farm will consist of 26 wind turbines, which will be connected to an offshore substation (MST) via an internal network of cables laid on the seabed. These components will be situated approximately 23 km north of the municipalities of Krokowa and Choczewo (Figure 2.1). The electricity generated during the operation of the offshore wind farm will be transmitted from the OTS to the mainland via the IP, i.e. the extra-high-voltage cable line, to the onshore transformer station (OTS) in the municipality of Choczewo (Figure 2.2). The connection between the offshore and onshore sections of the IP will be made using the trenchless horizontal directional drilling (HDD) method. The generated electricity will be transmitted to the onshore power substation, which forms part of the offshore wind farm's connection infrastructure, and then fed into the National Power System via the 400 kV Choczewo substation, owned by Polskie Sieci Elektroenergetyczne (PSE).

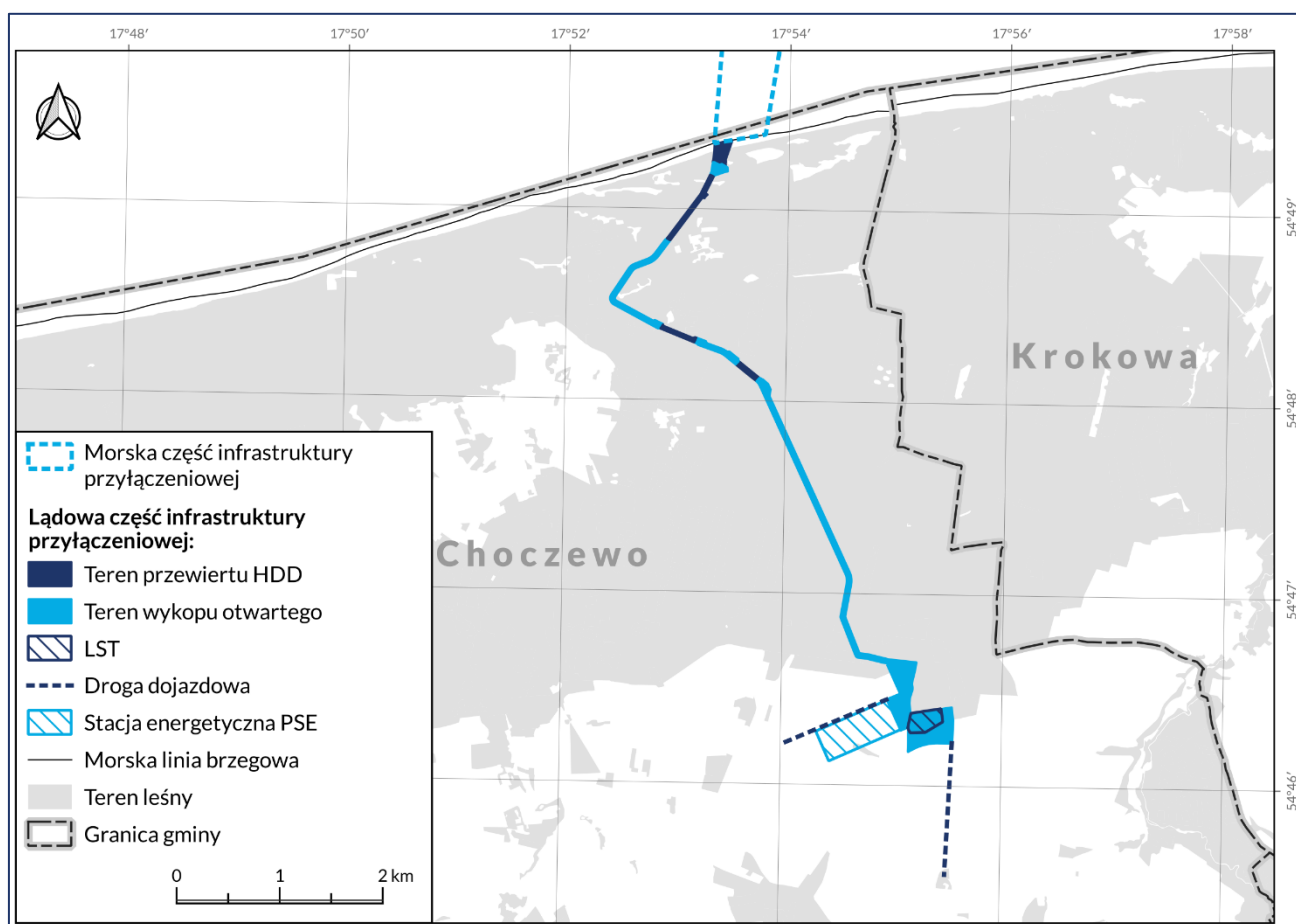


Figure2 .2 Detailed location of the onshore part of the Project

The ports of Władysławowo (40 km), Łeba (46 km) and Ustka (93 km) are situated in close proximity to the centre of the BC-Wind offshore wind farm area (Figure 2.1).

The area of the BC-Wind offshore wind farm development, in accordance with the 2022 PSZW decision, is 76.32 km² (B-Wind area: 39.01 km², C-Wind area: 37.32 km²).

The construction area for the IP will cover 16.86 km² at sea and 0.67 km² on land.

Furthermore, pursuant to Article 24.1 of the Act of 21 March 1991 on the maritime areas of the Republic of Poland and maritime administration (Journal of Laws 1991, No. 32, item 131), safety zones extending no further than 500 m may be designated around the area where the BC-Wind offshore wind farm turbines are to be constructed, established at the Investor's request by the Director of the Maritime Office in Gdynia.

2.2 Construction Schedule

CONSTRUCTION PHASE

The construction phase of the Project's offshore section will comprise the following activities:

- Carrying out a horizontal directional drilling (HDD) operation between the mainland and the sea for the installation of the electricity transmission cable,
- Provision of scour protection for the offshore wind turbine foundations,
- Installation of the foundations and components of the wind farm and the offshore substation,
- Laying the internal cable network and the offshore power connection,
- Routing of export cables ashore.

According to the current schedule (as at 31 July 2026), installation and construction works in the offshore part of the Project will be carried out during the following periods:

- **August 2026 to January 2027** – preparatory works: HDD drilling in the area where the cables come ashore; 15 November 2026 to **January 2027** – seabed protection at the foundation sites (*scour protection*),
- **from March 2027 to July 2028** (approx. 16 months) – installation of the offshore wind farm and necessary infrastructure: foundations and offshore substation (March–October 2027), internal cables (January–June 2028), installation of turbines (May–July 2028), including commissioning and testing until October 2028,
- **from August to November 2027** (over 3 months) – laying of the offshore section of the IP (export cable).

3. LEGAL FRAMEWORK AND REGULATORY CONTEXT

3.1 EU and international law

EU and international legislation does not provide for a standardised, mandatory compensation scheme for economic losses suffered by other sea users as a result of offshore wind farm projects.

The context in which commercial fishing vessel owners and operators of sea-based angling tourism vessels operate, arising in particular from the restrictions imposed by EU legislation under its Common Fisheries Policy, is set out below.

Due to the ban on cod fishing introduced on 1 January 2020 (Council Regulation (EU) 2019/1838) and the extension of this ban to the years 2025 and 2026 by Council Regulation (EU) 2025/202, a special EU fund has been set up with the aim, amongst other things, of supporting fishermen and related local communities through financial compensation for the permanent cessation of fishing activities and the diversification of fishing activities.

The European Maritime, Fisheries and Aquaculture Fund (EMFAF) is one of the European Union's funds implemented between 2021 and 2027 through the relevant national Operational Programme, as well as the associated detailed regulatory instruments, including relevant laws and regulations, and the related actions of the institutions involved in the implementation of the EMFF). The Fund aims, amongst other things, to support the implementation of the Common Fisheries Policy, including measures to improve the situation of commercial fishermen in light of the deteriorating biological status of fish stocks available for fishing.

3.2 Polish legislation

There is no coherent and mandatory system in Poland for compensating for damage resulting from the construction or operation of offshore wind farms. There is a lack of statutory provisions concerning both the legal basis for claims and the procedures for determining the amount of compensation or the investor's liability. Consequently, these matters must be resolved on a case-by-case basis in accordance with the general provisions of civil law or through agreements between the parties.

The amendment to the Act on the Promotion of Electricity Generation in Offshore Wind Farms, adopted in 2025, did not address this issue (see below). Offshore wind farm investors are implementing compensation schemes for operators of vessels affected by the implementation of offshore wind farm projects. The provisions of Polish legislation addressing the issues of offshore wind farms, fisheries and compensation schemes supporting the fisheries sector are identified and presented below.

In accordance with the Act of 3 October 2008 on access to information on the environment and its protection, public participation in environmental protection and environmental impact assessments, the EIA procedure requires an assessment of the investment's impact on people and property, as well as an analysis of social conflicts. In the case of projects that always have a significant impact on the environment (which include offshore wind farms), these issues are addressed in EIA reports, enabling an early assessment of the social impact associated with the project's implementation and the design of appropriate mitigation and preventive measures.

As part of the EIA procedure outlined above, public consultations are also held, coordinated by the competent authority (in the case of the Project – by the Regional Directorate for Environmental Protection in Gdańsk). As part of these consultations, those affected by the project may actively participate in the proceedings at every stage of the investment, and may submit comments, requests, letters or their own opinions. The entire case file is open to these individuals and must be made available to them on request, whilst the authority conducting the procedure is obliged to respond to all comments and motions. Furthermore, it is possible to

hold an administrative hearing open to those affected by the project, particularly where there are contentious issues in the case.

In accordance with the Act of 21 March 1991 on the maritime areas of the Republic of Poland and maritime administration, the regional maritime office (in the case of the Project – the Maritime Office in Gdynia) is responsible for establishing safety zones tailored to the type and planned location of artificial islands and other infrastructure, which should not be situated further than 500 m from any point on the outer edge, unless a different range of the zone is permitted by adopted international standards or recommended by the relevant international organisation. The Maritime Office is also responsible for specifying the conditions for movement within safety zones, including any applicable restrictions on navigation, fishing, underwater works, etc.

The PZPPOM was adopted by the Regulation of the Council of Ministers of 14 April 2021 on the adoption of the spatial development plan for internal maritime waters, the territorial sea and the exclusive economic zone on a scale of 1:200,000 (Journal of Laws 2021, item 935). Under this Plan, water bodies with specific primary and permissible functions have been designated. Conditions, prohibitions or restrictions regarding the use of each water body have also been specified. In the case of the BC-Wind offshore wind farm, which will be located in water body POM.46.E, during the operation of the offshore wind farm, until fishing rules for this area have been established, fishing is prohibited within the safety zones of each structure and in areas posing a threat to the safety of the internal connection infrastructure. The protection of living marine resources in this area is subject to the regulations on sea fishing, under which the rules, prohibitions and restrictions applicable to fishing apply.

The Act of 19 December 2014 on sea fishing aligns Polish fisheries law with EU law, primarily in the areas of control and supervision of sea fishing and the management of living marine resources, including the allocation of certain fishing rights. The Act applies, amongst others, to persons carrying out fishing activities in Polish maritime areas, shipowners and masters of Polish fishing vessels engaged in sea fishing in Polish maritime areas. Under the Act, the owner of any fishing vessel holds individual fishing capacity, and individual owners may transfer all or

part of their fishing capacity to the owner of another fishing vessel. Furthermore, vessels fishing in the open waters of the Baltic Sea must be at least 5 metres in length.

In 2025, the Act of 9 October 2025 amending the Act on the promotion of electricity generation in offshore wind farms and certain other Acts (Journal of Laws, item 1535) came into force. The amendments introduced accelerate the implementation of and improve the investment conditions for offshore wind farm projects. The draft of this amendment provided for the addition to the Act of 19 December 2014 on sea fisheries of statutory authorisations to issue regulations: specifying the method of documenting and calculating compensation for fishermen for losses related to the construction, operation and decommissioning of offshore wind farms, as well as setting out detailed conditions for the conduct of commercial fishing within the area of an offshore wind farm. However, these provisions were not included in the adopted Act, which does not introduce any amendments to the Act on Sea Fisheries.

As of September 2026, therefore, the Polish legal system contains neither a common, statutory method for verifying losses and calculating compensation for fishermen, nor a statutory authorisation to establish such a method by regulation. Compensation is provided through voluntary investor schemes, based on civil law contracts and the requirements of the funding institutions.

The Act of 26 September 2025 on State aid for vessel owners in connection with the introduction of a ban on cod fishing in the Baltic Sea (Journal of Laws, item 1540), support from the state budget was introduced for owners of commercial yachts providing transport services to recreational anglers, whose operations have been affected by the ban on cod fishing in force since 1 January 2020. Support is available only in the event of the permanent decommissioning of the vessel: its scrapping, a commitment to scrap it within 120 days of receiving the support, or its transfer free of charge to a public administration body or a state school. The amount of support is calculated on the basis of the vessel's hull volume, according to the rates specified in the Act, with an upper limit of PLN 1,200,000 per vessel; support is granted only once per vessel. Eligibility criteria include, amongst other things, documented activity in commercial and recreational fishing between 2015 and 2019 (at least 90 catch reports) and the vessel being fully operational as at 1 January 2020. The call for applications, managed by the directors of maritime

offices, took place between 1 and 15 July 2026, following the European Commission's decision on the compatibility of the aid with the internal market; support is granted until 31 December 2026. The implications of this Act for the eligibility of vessels for the Programme are set out in Chapter 6.1.

For the purposes of this document, it is assumed that the orders of the Director of the Maritime Authority, specific to the construction period of the Investment, will prevent any fishing from taking place within its area.

3.3. International standards of financing institutions

The Project is being financed under a project finance arrangement. A condition of the financing is compliance with the environmental and social requirements of the financing institutions. The obligation to draw up and implement this Plan stems from the Project's Environmental and Social Action Plan (ESAP, item 11).

The reference framework for the Plan comprises, in particular:

- **IFC Performance Standard 1:** Assessment and Management of Environmental and Social Risks and Impacts (2012) – requirements concerning the identification of social impacts, stakeholder engagement, disclosure of information, and the mechanism for receiving and addressing complaints;
- **IFC Performance Standard 5:** Land Acquisition and Involuntary Resettlement (2012) – guidelines for dealing with economic resettlement, including the loss of or restricted access to marine resources that constitute a source of livelihood (§ 5);
- **EIB Environmental and Social Standard 6:** Involuntary Resettlement (2022) – analogous requirements of the European Investment Bank; a comparison of this standard with national guidelines is set out in Annex 1.

The following principles, common to the above standards, have shaped the structure of the Plan:

1. avoiding, and where this is not possible, minimising economic resettlement, including through the phased introduction of spatial and temporal restrictions (Chapter 4);
2. compensation for loss of income for those affected by restrictions on access to fishing grounds, taking into account those who actually use the area (Chapter 6);
3. transparent eligibility criteria, uniform for all, and a transparent method for calculating compensation, based on objective data (Chapters 6.1–6.5);
4. consultations with the affected groups prior to the programme's implementation and active dissemination of information regarding the call for applications (Chapters 6.6–6.7);
5. an accessible and free mechanism for submitting queries and claims, which does not restrict the right to pursue claims through administrative or judicial channels (Annex 2);
6. special attention to vulnerable groups (Chapter 5.3);
7. monitoring of the Plan's implementation and an independent final audit (Chapter 7).

The above summary is for information purposes only and indicates the sources of the principles adopted in the Plan. References to selected requirements are provided in the footnotes in the relevant chapters of the document.

4. POTENTIAL IMPACTS OF THE PROJECT

As part of the EIA procedure, the Project's impact on people and property was assessed. The EIA report for the OWF (dated December 2024) identified potential social impacts, including on fisheries and shipping routes between Gdańsk Bay and the Bornholm Strait. The potential impact on property, fisheries and maritime transport was assessed as low during the construction and operation phases and negligible during the decommissioning phase of the offshore wind farm.

According to the EIA Report for the IP (dated August 2023), there will be periodic disruptions to the use of the water body by other users. This applies to shipping and fishing, as well as

and, to a much lesser extent, tourism. At every stage of the project's implementation, the severity of these disruptions has been assessed as relatively limited.

The Project's stakeholders, together with the communities affected by the Project's implementation, have been identified in the Stakeholder Engagement Plan.

Despite the low impact on overall fishing activity assessed during the EIA procedure (EIA Report for the MFW dated December 2024), the Investor recognises the potential for disruption to the work of local fishermen due to the establishment of safety zones, which restrict or prohibit fishing activities and navigation within the MFW area and, periodically, along the route of the export cables whilst cable-laying vessels are in operation. Construction works in the offshore section will result in a reduction in the fishing area and a potential increase in the costs of organising fishing trips, due to longer routes to fishing grounds, as well as changes in the distribution of fish shoals caused by habitat modification and the relocation of fishing activities to alternative areas.

4.1 Potential reduction in fishing income

To determine the potential reduction in fish catches resulting from the implementation of the project, an analysis of fisheries in the Polish sector of the Baltic Sea for the period 2016–2025, using data from fishing vessels' catch reports provided by the Fisheries Monitoring Centre (CMR) of the Fisheries Department at the Ministry of Agriculture and Rural Development. The data includes the fishing location (fishing square), species caught, catch volumes, fishing gear used and vessel size (vessels < 12 m and > 12 m), as well as the name of the port from which the vessel set sail and to which it returned. Personal data relating to vessel owners is not available.

During construction within the marine part of the Project, the use of the marine space will be restricted. This will result in a reduction in the area available for commercial fishing in certain parts of fishing squares O6, O7 (the location of the transmission infrastructure) and O8 and P8 (the OSE location) (Figure 4.1), which are situated in ICES sub-areas 25 and 26. This

temporary restriction of the area is likely to lead to a partial reduction in the income of vessel operators fishing in the aforementioned fishing squares.

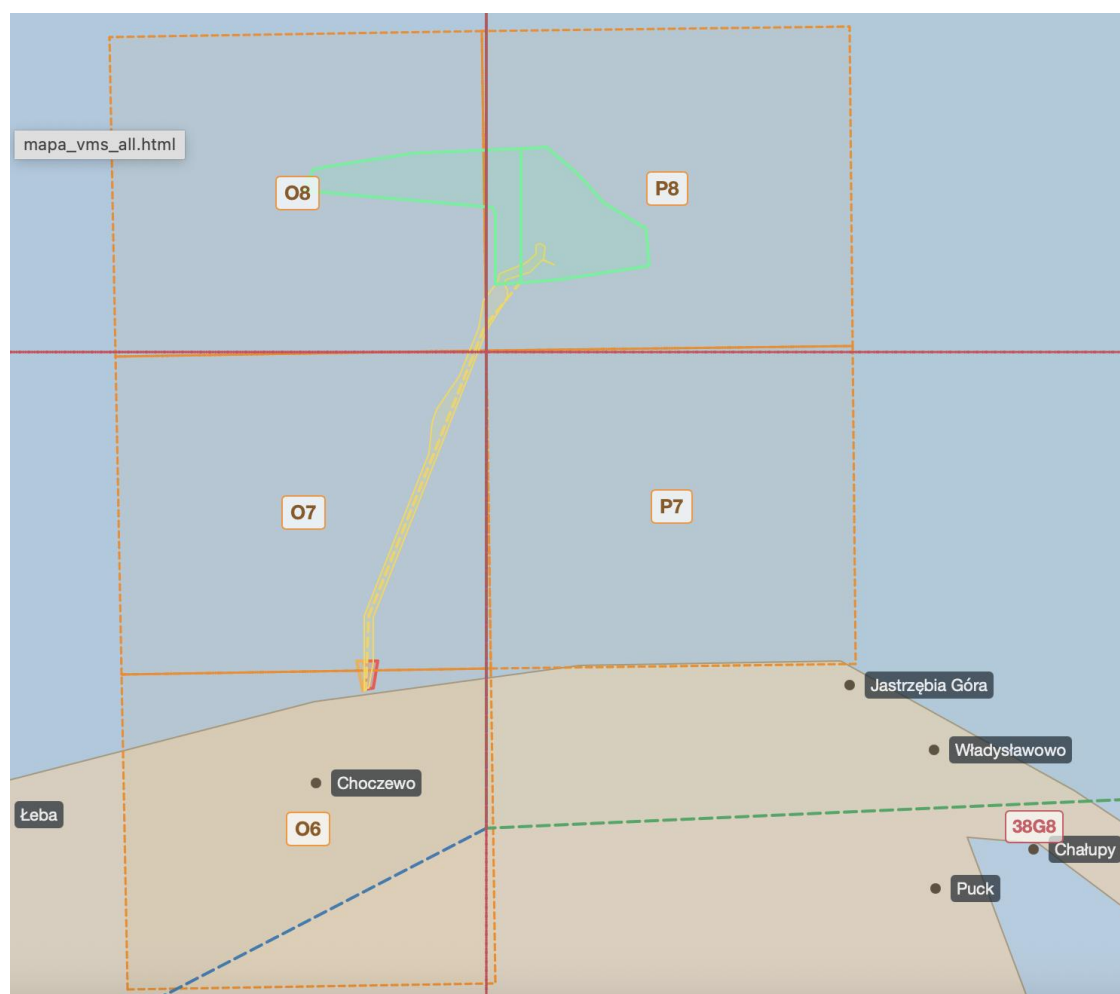


Figure4 .1 The investment area superimposed on the fishing squares

The MFW development area covers a total of approx. 76 km², which corresponds to approx. 3.8% of the area of the five fishing squares analysed, whilst the connection infrastructure outside the MFW area (a 500 m wide cable corridor) covers approx. 14 km², i.e. approx. 0.7% (Table4 .1). The analysis covered five adjacent fishing squares, although the extent of area occupied by the infrastructure and the potential temporary restrictions associated with construction works vary between the individual squares. The proportion of area occupied varies significantly between the squares – from 0 per cent (P7) to approximately 14 per cent (P8). The values were calculated geometrically on the basis of the farm's boundaries and the width of the cable corridor (500 m), as confirmed by the Investor. The proposed safety zone coincides with the MFW development area (Chapter 4.3); the coverage values are therefore reliable for the construction period."

Table4 .1 Area of the analysed fishing squares occupied by the project

Square	MFW area [km ²]	MFW [%]	IP area [km ²]	IP [%]	Total [km ²]
O6	0.00	0%	0.939	0.24%	0.94
O7	0.00	0%	11.750	2.93%	11.75
O8	23.62	5.88%	1.233	0.31%	24.85
P7	0.00	0%	0.000	0%	0.00
P8	52.71	13.34%	3.893	0.98%	56.60
Total	76.33	—	17.82	—	94.14

FISH CATCH VOLUMES

Between 2016 and 2026, catch volumes in Polish maritime areas (POM) varied significantly across different locations – ranging from 110 kg (square U7) to 6,962,000 kg (square S5). When comparing fish catches in the analysed squares (O6, O7, O8, P7, P8) with those in the remaining POM squares over the last 10 years, they are generally characterised by low catch volumes.

The total catch in the five squares analysed for the period 2016–2025 amounted to approximately 6,197 tonnes. The largest catches were recorded in square P8 (approx. 4,895 tonnes), where the MFW will be located, whilst the smallest were in square O7 (approx. 163 tonnes), through which the IP is planned to run.

Fishing squares O8 and P8, situated further from the coastal zone, are characterised by catches of pelagic species (herring and sprat), whilst squares O6 and O7, situated closer to the coast, are characterised by catches of demersal species: cod and flounder. In fishing square P7, the proportions of whiting, cod and herring are similar. Since 2020, all cod caught in each of the analysed fishing squares have been by-catches exclusively.

Detailed technical calculations regarding the volume of commercial catches, obtained from the CMR, are held by the Investor and may be made available for inspection at the request of an interested party.

VALUE OF FISH CATCHES IN FISHING SQUARES O6–O8, P7–P8

Area occupied by the project

The table below shows the proportion of each square's area occupied by the MFW development area and by the accompanying infrastructure outside that area (IP, a 500-metre-wide cable corridor). The figures were calculated geometrically on the basis of our own spatial analysis (intersection of the fishing square boundaries with the farm area and the cable corridor).

Annual catch figures (2016–2025)

CMR data, in conjunction with publicly available EUMOFA data, enable the value of catches in individual squares over a 10-year period to be determined.

Table4 .2 Value of catches by square and year (EUR)

Grid square	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
BO6	54,342	36,128	25,498	12,607	7,609	13,566	6,924	30,579	25,700	15,155
BO7	46,051	31,177	31,524	7,420	7,651	2,571	4,361	2,639	4,551	11,448
BO8	30,415	39,238	16,798	15,185	9,799	7,385	2,505	4,402	35,753	31,469
BP7	137,507	57,708	28,084	49,253	33,953	36,456	45,749	52,415	59,975	27,546
BP8	70,294	253,587	143,875	181,334	94,471	27,720	70,195	49,625	209,423	458,885
TOTAL	340,625	419,856	247,796	267,817	155,504	89,719	131,757	141,683	337,425	546,528

Fishing catch structure by species

Table4 .3 Key species by catch value (2016–2025)

Species	Value (2016–2025)	Catch (kg)
Herring	EUR 1,087,673	3,087,459
Sprat	596,337 EUR	2,244,047
Cod	369,732 EUR	283,035
Turbot, brill	240,872 EUR	43,116
Stornia	219,947 EUR	486,325
Sea trout	86,943 EUR	20,560
Plaice	24,721 EUR	21,775
Perch	10,386 EUR	5,737

Herring and sprat (pelagic catches) together account for over 60 per cent of the total value of catches in the analysed squares.

Unit prices – seasonality and annual trend

The table below shows the average unit price (EUR/kg) at first sale in simplified form, for the seven main fish species on an annual basis. The calculation utilised first-sale prices published

by EUMOFA¹ for the ports of Władysławowo and Łeba, for individual months in the years 2016–2025, for all species for which commercial catches were reported². Detailed technical calculations are held by the Investor and may be made available for inspection if required.

Table4 .4 Average unit price by species and year (EUR/kg)

Species	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Cod	1.25	1.34	1.34	1.29	1.63	1.60	2.56	1.36	1.88	0.80
Herring	0.34	0.29	0.25	0.26	0.23	0.28	0.34	0.46	0.53	0.53
Sprat	0.24	0.20	0.17	0.17	0.20	0.21	0.21	0.31	0.44	0.44
Turbot, scorpionfish	4.46	5.17	4.91	4.67	4.38	4.89	5.61	7.85	7.96	7.99
Stornia	0.38	0.41	0.42	0.41	0.37	0.29	0.28	0.42	0.70	0.96
Sea trout	6.01	8.10	6.59	7.05	7.16	7.78	9.65	10.09	17.43	15.50
Plaice	0.61	0.51	0.64	0.64	1.08	0.93	1.79	1.20	1.54	1.68

FISHING GEAR

The most commonly used fishing gear in the analysed fishing squares between 2016 and 2025 was passive gear – mainly set gillnets (anchored) and drift lines – whilst the most commonly used active gear was pelagic beam trawls and bottom beam trawls.

The structure of catch value by fishing gear for the years 2016–2025 is presented in Table4 .5 . In terms of value, beam trawls and set gillnets (anchored) dominate, which corresponds to the species composition of catches in the analysed fishing squares.

¹European Market Observatory for Fisheries and Aquaculture Products, <https://eumofa.eu>

²<https://fishery-aquaculture-market-observatory.ec.europa.eu/data/dashboards/first-sale-monthly-data>; accessed on 28 June 2026

Table 4.5 Value of catches by fishing gear in 2016–2025

Fishing gear	Value (2016–2025)
Pelagic otter trawls (OTM)	EUR 1,665,004.00
Set gillnets (anchored) (GNS)	EUR 757,467.81
Drift longlines (LLD)	EUR 73,726.19
Bottom otter trawls (OTB)	122,587 EUR
Standing longlines (LLS)	66,588.74 EUR

In fishing squares O8 and P8, which are situated further from the coastal zone, within the boundaries of the MFW development area, mainly pelagic species are caught; hence the significant use of pelagic beam trawls for fishing species such as sprat and herring, whilst in squares O6, O7 (the IP corridor area) and P7, catches were characterised by a higher proportion of demersal species: cod and flounder, which are caught using demersal trawls or set gillnets (anchored) (He et al. 2021).

The Spatial Development Plan for Polish Maritime Areas (Journal of Laws 2021, item 935) also refers to the fishing methods used in the POM.46.E area, where the MFW is located. The water body is used for fishing with static gear (in the central and eastern parts), towed gear (in the western and central parts) and as the main route to the Słupsk Trench fishing ground (in the central part).

FISHING VESSELS

Fishing vessels operating in the area of the planned investment have been classified by hull length, in accordance with EU Council Regulation No 508/2014:

- vessels up to 12 metres in length – constituting what is known as small-scale coastal fishing. They operate in territorial waters, in the immediate vicinity of the shore. Given their limited operational range, their activities should not be significantly disrupted by

the operation of the offshore wind farm. Potential impacts are mainly limited to the construction phase of the project, when there may be short-term difficulties in accessing specific fishing grounds.

- vessels over 12 metres in length – which also fish in the Exclusive Economic Zone (EEZ) covering the area of the planned investment. It is this group of vessels that may be most vulnerable to the Project's impact, particularly during the installation works.

Over a 10-year period, in the analysed fishing squares, based on the average number of fishing vessels, vessels over 12 metres accounted for a larger share. The highest number of these vessels fished in square P8, whilst square O6 was the least utilised. At the same time, it can be observed that, over the years, the size of the fleet (due to a decline in the catch rates of the main, significant fish species) operating in the analysed fishing squares has fallen significantly.

A detailed analysis of the activity of fishing vessels in individual fishing squares can be found in sub-section 4.2.

RECREATIONAL SEA ANGLING

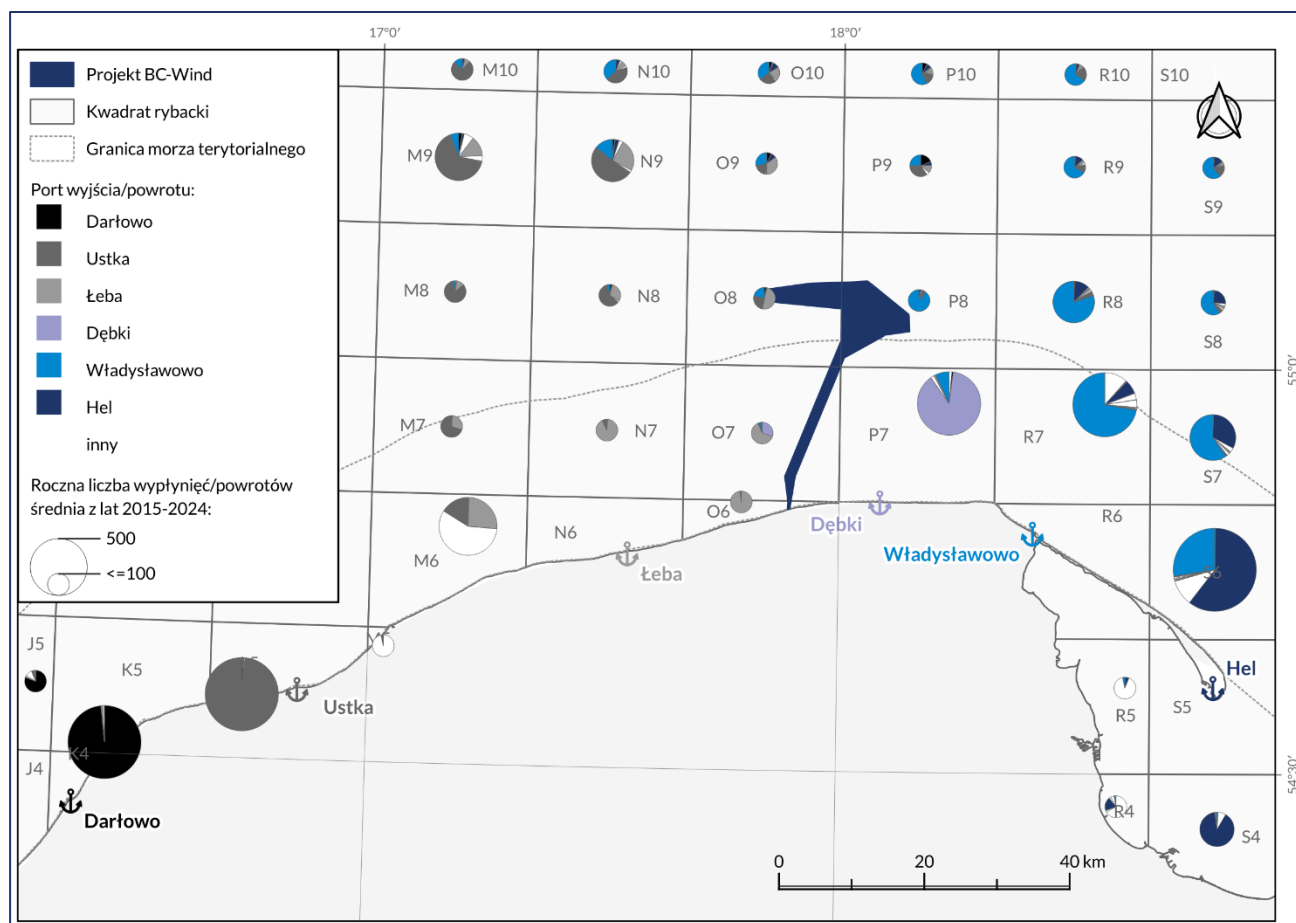


Figure4 .2 Ports of departure/return for fishing vessels in the fishing squares

Data on recreational fishing (referred to in this report as recreational sea angling), sourced from GIRM, were based primarily on the quantities of species caught. Recreational fishing between 2015 and 2024 took place in ICES areas 24–26, which cover most of the POM area.

Cod was the most commonly caught species. Total catches over the 10-year period amounted to 2,776 tonnes. However, following 2019, recreational catches of this species declined to zero by 2023 due to EU regulations. Due to the significant differences between the catch volumes of cod and those of other species, it has not been included in the chart below. The second most commonly caught species was herring. A total of 10 tonnes were caught over the 10-year period. Larger quantities (over 1 tonne) were also recorded for species such as flounder, salmon, mackerel, bream and garfish (Figure 4.3). Other species were caught in much smaller quantities and are not included in the chart below.

After 2020, there has been a significant decline in total recreational sea fishing in Poland, which has practically ceased entirely (only a small catch of herring weighing 11 kg was recorded), which is linked to the deteriorating state of the Baltic Sea fish fauna and the quotas and fishing bans introduced to protect it.

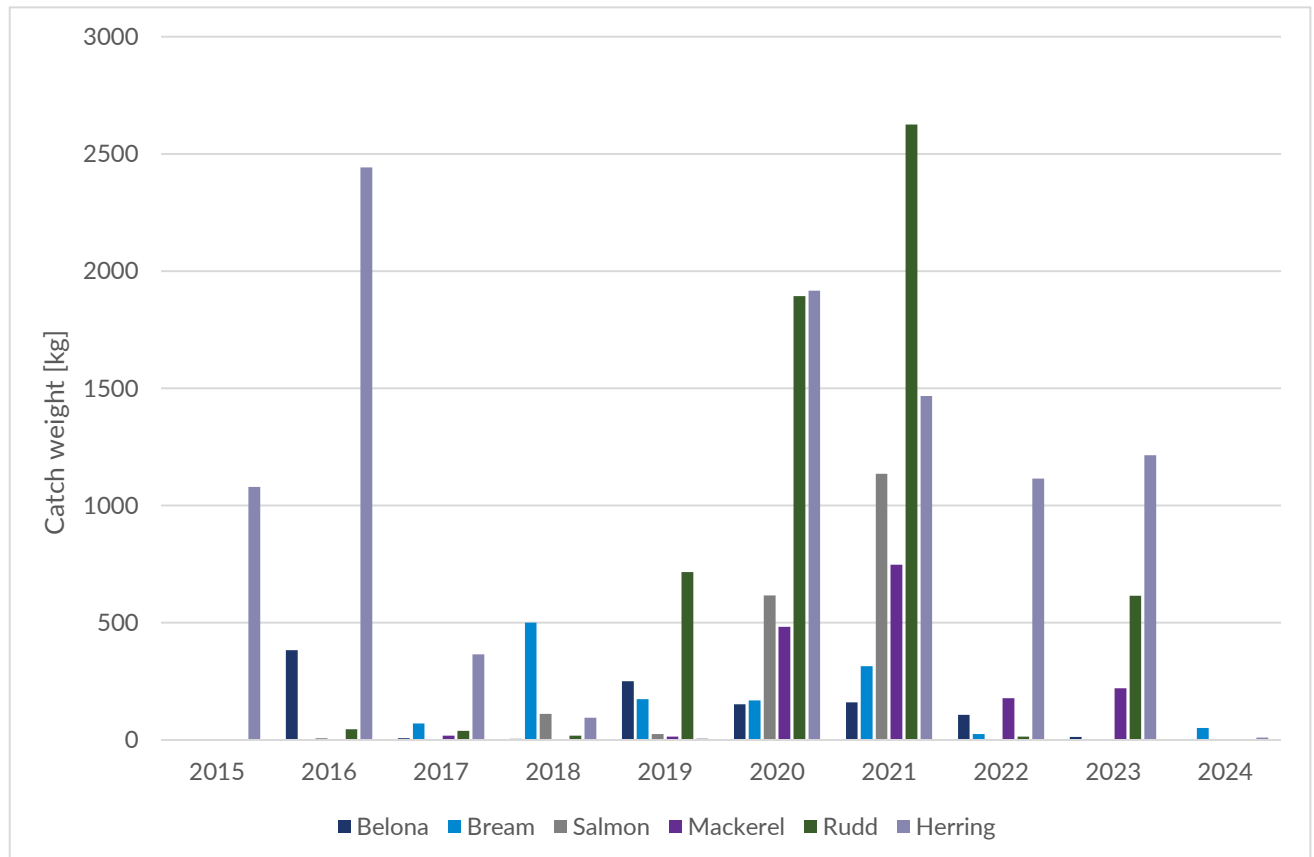


Figure4 .3 Recreational catches broken down by species caught in quantities exceeding 1 t in 2015–2024

ASSESSMENT OF THE IMPACT ON FISHERIES IN THE ANALYSED FISHING SQUARES

Taking into account the following premises:

- over the last 10 years (2016–2025), the analysed fishing squares have accounted for a small proportion of total catches in the POM, both in terms of volume and catch value. It can therefore be concluded that they do not play a significant role in Baltic fisheries,

- in the POM, and consequently, in the fishing squares where the investment will be carried out, fishing bans and limits are in force, which are most likely to be maintained in the coming years, and may even be tightened due to the lack of improvement in the status of the cod stock, one of the main commercially fished species,
- the small percentage of the area of the analysed fishing squares occupied by MFW (approx. 3.8 per cent) and IP (approx. 0.7 per cent) does not preclude the possibility of fishing in other parts of these squares,
- there is also the possibility of fishing in neighbouring squares,
- fishing activity within the IP area will be restricted: during the approximately 41-day cable-laying phase in the corridor (according to the construction schedule), a fishing ban will be in force, whilst during the operational phase only partial restrictions are anticipated, concerning selected fishing gear (likely bottom-set gear)
- the assessment of the impact of the BC-Wind offshore wind farm (EIA Report, December 2024) and the IP (EIA Report, August 2023) on fisheries, which concluded that the impact of the offshore wind farm will be insignificant and that of the IP will be negligible,

it must be concluded that the investment will have an impact on fisheries, and consequently on a reduction in income in the analysed squares, but that this impact will be relatively minor.

4.2 Potential increase in operating costs for those affected by the Project

COMMERCIAL FISHERIES

The potential increase in operating costs stems from the fact that, during construction within the offshore section of the Project (MFW and the offshore section of the IP), the use of maritime space will be restricted, as indicated in Chapter 4.1. This will affect parts of fishing squares: O6, O7, O8 and P8, and may result in longer journeys to fishing grounds for

commercial fishing vessels and sea-based recreational fishing vessels. Vessels operating in the marine areas covered by the Project will be forced to travel to other fishing grounds, whilst those operating in marine areas outside the Project area will be required to avoid them during construction. This may result in longer routes and journey times, which in turn may lead to an increase in the operating costs incurred by the operators of these vessels, including the need to purchase additional fuel and potentially pay extra wages to crew members, as well as general wear and tear on the vessel. It follows that the Project's potential impact in terms of increasing route length will affect one of these groups; it can therefore be assumed that any increase in the vessels' operating costs will be borne by the vessel operators.

The analysis of VMS data described below necessarily excludes vessels under 12 m in length, which are not covered by this system. Most vessels under 12 m operating from the ports of Łeba and Władysławowo and from the Dębki marina can be defined as a small-scale fleet, i.e. one that does not use towed fishing gear. *Table 4.5* indicates that a significant proportion of the catch value in the fishing squares where the project is located comes from fishing with set gillnets (GNS).

In view of the above, in order to ensure equal compensation conditions for all fishing stakeholders affected by the Project, the methodology for calculating compensation described in section 6.3, which compensates for the direct losses of fishing vessels in the project area, will be significantly more favourable to vessels under 12 m in length, due to a significantly higher value of the A% coefficient, than to vessels over 12 m in length.

VMS ANALYSIS

In order to verify the use of the Project area by fishing vessels, an analysis was carried out of data from the Vessel Monitoring System (VMS) for the years 2016–2025, covering 837,575 recorded positions of 292 fishing vessels (Sea Clouds, 2026). The VMS is mandatory for fishing vessels at least 12 m in length (Council Regulation (EC) No 1224/2009); it therefore covers the group of vessels most exposed to the Project's impact, which operate in the WSE (see Chapter 4.1). The median interval between successive position reports in the analysed dataset

is 40 minutes, which is significantly shorter than the regulatory minimum (at least once every 2 hours, in accordance with Article 22 of Commission Implementing Regulation (EU) No 404/2011), ensuring a high resolution of the analysis.

For fishing vessels, the analysis of VMS data replaces the analysis of AIS data, which is used later in this chapter for recreational craft. The obligation to use AIS applies only to fishing vessels with an overall length of more than 15 m (Article 6a of Directive 2002/59/EC), whilst the fleet operating in the analysed fishing squares consists predominantly of smaller vessels. A picture of fishing activity based solely on AIS data would therefore be unrepresentative.

VMS positions within the Project area were classified on the basis of vessel speed: positions at speeds of up to 5 knots were taken as an indicator of fishing activity, and those above 5 knots as transit; the speed distribution in the data shows a clear bimodality, confirming the validity of this classification. A vessel was classified as fishing within the area if at least 50 per cent of its positions within the area corresponded to fishing speed. The vessel's home port was determined analytically on the basis of locations of prolonged stops (interruptions in signal transmission of ≥ 4 hours); the home port determined in this way is an approximation of the port most frequently used by the vessel and need not correspond to its formal home port.

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Figure4 .4 Routes of fishing vessels based on VMS data for the years 2016–2025

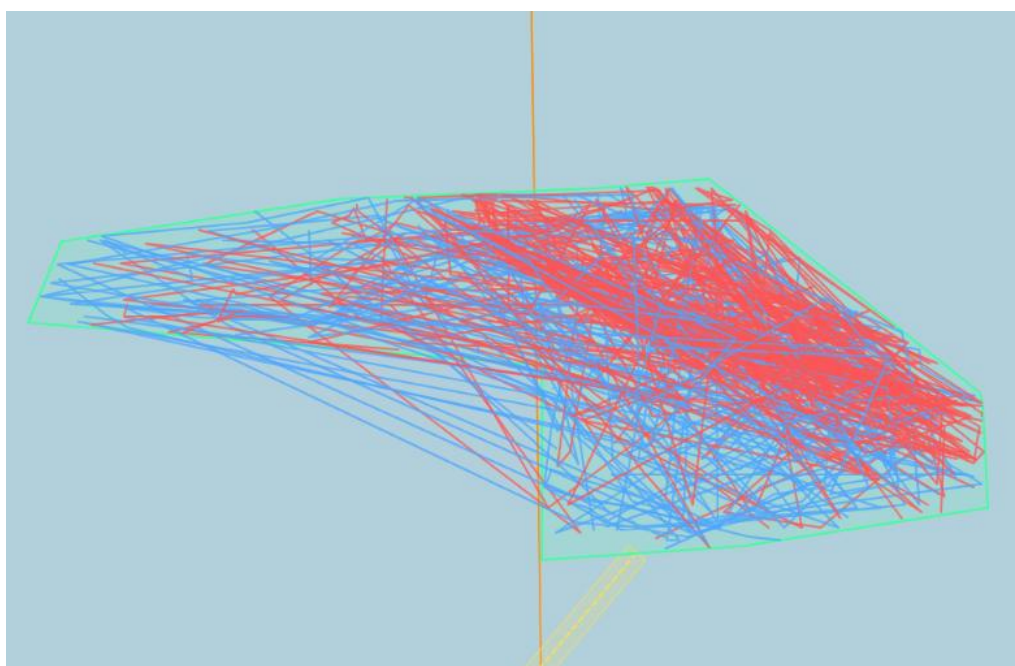


Figure4 .5 Distribution of VMS positions in the BC-Wind area: fishing positions (red) and transit positions (blue)

The nearshore area (where the cable infrastructure comes ashore in the municipality of Choczewo) shows negligible fishing activity by vessels equipped with VMS: throughout the period 2016–2025, positions were recorded for just 6 vessels (between 1 and 17 positions each), and no new vessels have appeared there since 2022.

In the cable corridor (the area defined by the Location Decision for the offshore section of the export cable route, approximately 25.9 km in length), a total of 71 vessels were identified between 2016 and 2025, of which 24 (34 per cent) were classified as fishing for **Error! Reference source not found.** . Of these, 57 vessels (80%) were also recorded within the farm area – for this group, the corridor constitutes a natural extension of the route to their fishing grounds; 14 vessels (20%) were found exclusively within the corridor, en route to fishing grounds unrelated to the project area. The cable corridor, unlike the farm area and the coastal area, remains open to shipping during construction, with the exception of sections subject to temporary restrictions whilst works are in progress (Chapter 4.3).

Vessels transiting through the farm area (89 over the entire analysis period) and through the cable corridor constitute a significant group from the perspective of potential route lengthening (see Chapter 6). Detailed analyses are contained in the source report (Sea Clouds 2026).

An analysis of fishing vessels' routes based on VMS data (Figure 4.4) confirms that vessels used for commercial fishing operate within the area of the planned BC-Wind MFC. Implementation of the Project will necessitate a shift in the vessels' routes (as well as their fishing grounds) from the north-eastern region out of its area. It should be noted here that the Project area is the outermost OWF in the complex of planned OWFs, so it is possible to bypass the area from the east. It will also be possible to bypass the Project area from the west, as, in accordance with the provisions of the Environmental Impact Assessment (EIA) for offshore wind farms (dated 16 September 2022 and 1 July 2025), a migration corridor for birds will be left open between the BC-Wind offshore wind farm area and the area of the nearest planned

offshore wind farm to the west neighbouring offshore wind farm to be built to the west, a passable migration corridor for birds will be left (an area free from turbine blades and offshore power stations), the width of which will be no less than 4 km, and its axis will be a straight line. This will allow vessel routes to be extended by only the absolute minimum necessary.

OTHER TYPES OF MARITIME ACTIVITIES

In order to verify whether the Project area and its vicinity are frequently used by tourist vessels, an analysis of data from the Automatic Identification System (AIS) was also carried out. Due to the long period covered by the analysis (10 years), the large volume of raw AIS data, and the labour-intensive nature of its processing—which goes beyond the scope of this study—processed data in GeoTIFF format were used, obtained from EMODnet Human Activities (website 2) for the period from 2017 to 2023. The data, processed into map form, show shipping density in a 1x1 km grid. The presence of vessels is expressed in hours per square kilometre, averaged per day. These analyses present average values for this 7-year period. A high intensity of vessel presence can be interpreted as the result of either a large number of vessels passing through a given area or a smaller number of vessels remaining there for a longer period of time. The AIS analysis was limited to maritime tourism vessels; the activity of fishing vessels is presented above based on VMS data.

The vessel categories taken into account in the following analyses are:

- vessels engaged in recreational sea angling,
- sailing vessels,
- passenger vessels.

Maritime tourism includes vessels dedicated to recreational sea angling, sailing vessels and some passenger ships. The latter may be classified as maritime tourism if they are used for cruise or sightseeing trips. However, maritime tourism does not include passenger vessels performing transport or service functions, i.e. public transport on regular routes or vessels used to carry crews.

As can be seen in Figure 4.6, recreational sea angling was carried out by vessels using the AIS system, mainly close to the coast (up to approximately 3 nautical miles). The implementation of the BC-Wind MFW, together with the IP, will therefore not have had an impact on the course of recreational voyages. It should be noted, however, that the obligation to use AIS does not apply to vessels engaged in recreational sea angling with a length of less than 15 metres; consequently, the picture of their activity must be regarded as incomplete; this does not, however, alter the conclusion that recreational traffic is concentrated in the coastal zone.

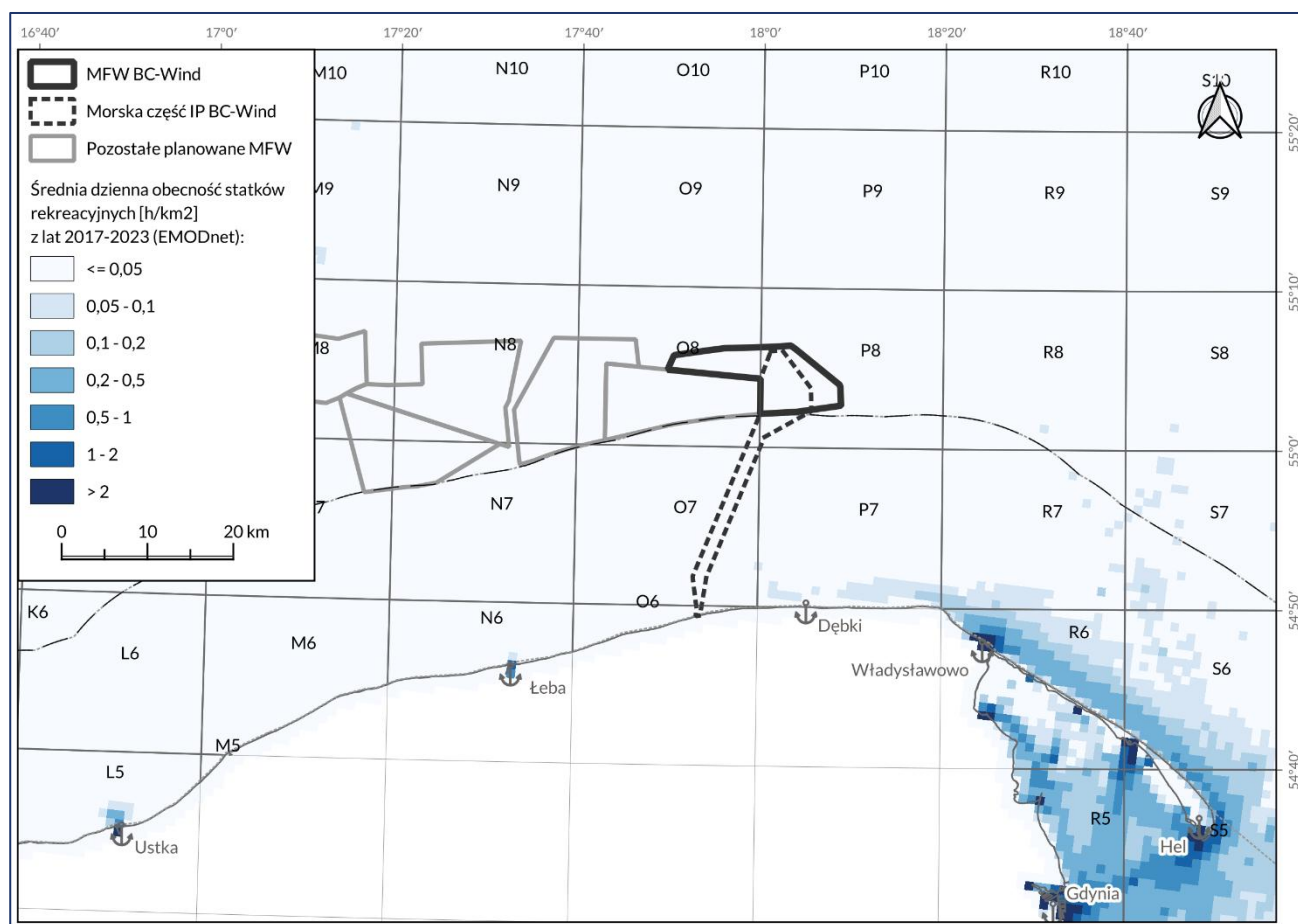


Figure 4.6 Presence of vessels used for recreational sea angling near recreational development areas in the Baltic Sea

Based on Figure 4.7, it can be concluded that sailing vessels mainly operate in territorial waters (i.e. up to 12 nautical miles from the coast). Their routes cross the marine section of the BC-Wind IP; however, construction of the IP is being carried out in such a way that there will be

no simultaneous closure of the entire cable route area, so the vessels' routes will only require minor adjustments to bypass the current construction section. Consequently, no adverse impact on the sailing routes of sailing vessels is anticipated as a result of the Project's implementation.

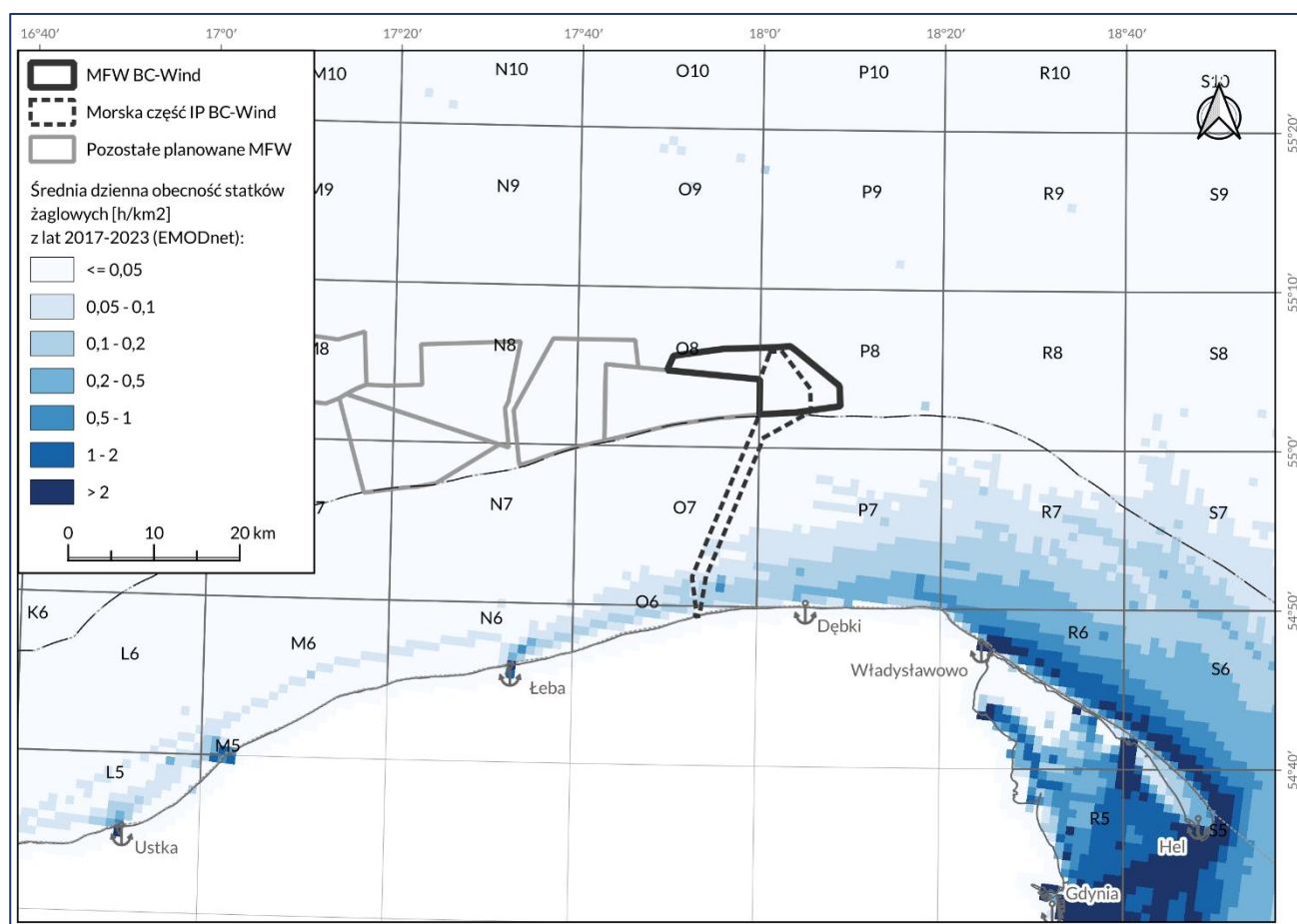


Figure4 .7 The presence of sailing vessels in the Baltic Sea

A shipping route connecting the ports of Gdańsk Bay with Karlskrona in Sweden runs through the BC-Wind offshore wind farm area (Figure 4.8). Due to the location decisions issued for the construction of the offshore wind farm, this route has been modified and, according to the PZPPOM, now bypasses the BC-Wind offshore wind farm area to the east. In terms of the

entire route, the proposed change to the route will result in a slight extension, which will translate into a minor increase in costs and a longer sailing time. However, this route is used to a large extent by vessels serving a transport rather than a recreational purpose.

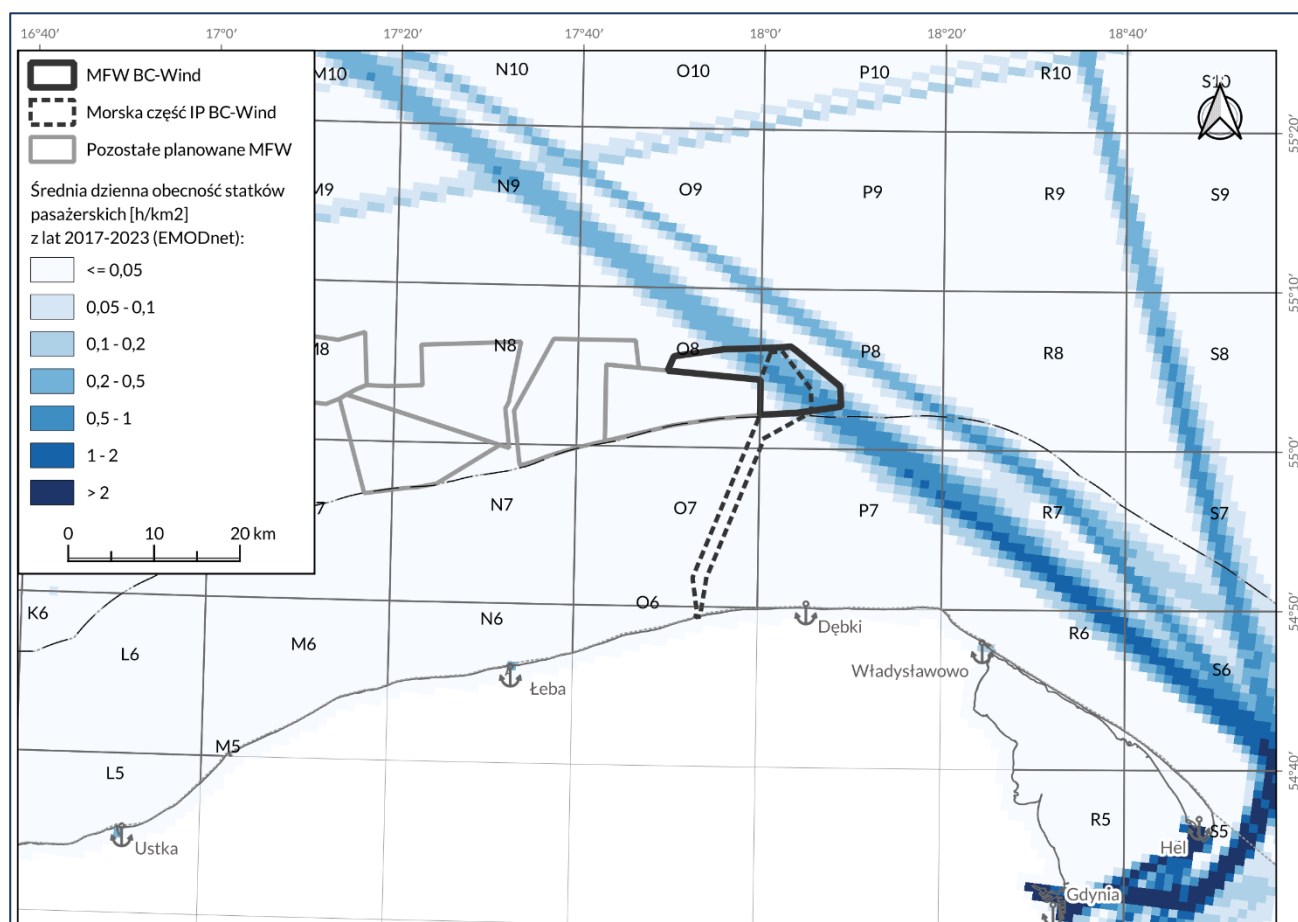


Figure4 .8 The presence of passenger vessels in the Baltic Sea

4.3 The Investor's obligations arising from administrative decisions

The environmental consent decisions obtained by the Investor for the Project set out a range of measures designed to minimise potential adverse impacts.

In accordance with the provisions of the Environmental Conditions Decision (ECD) for the MFW (dated 16 September 2022 and 1 July 2025), in order to limit any potential loss of livelihoods and disruptions to the use of the marine area during the construction phase, there is an obligation to systematically update information (at least once a week) on the progress of development within the MFW area, progress of construction, vessels and contractors present within the construction area, which is of crucial importance for the planning of fishing operations by local fishing and recreational vessels. The Investor will be required to provide the above information to the Director of the Maritime Office in Gdynia and the Hydrographic Office of the Navy.

As at 27 August 2026, the status of established and proposed restrictions on the use of maritime space for the purposes of the Project's construction is as follows:

- **MFW area.** On 29 July 2026, the Director of the Maritime Office in Gdynia received an application from the Investor to establish a safety zone covering the MFW construction area, without an additional buffer zone beyond its boundaries. The coordinates of the outline of the proposed zone are set out in Appendix 3, and its boundary is shown in Figure Z3.1 (Appendix 3). The order has not yet been issued; once it has been issued, the Plan will be updated to include the date and number of the order, as well as the conditions for movement within the zone as specified therein.
- **Cable landfall area (coastal section IP):** safety zones were established by orders of the Director of the Maritime Office in Gdynia dated 16 March 2026 : for the HDD works area – valid until 1 August 2026 (item 1158), for the coastal section of the cable – valid until 30 June 2028 (item 1159).

- **Export cable corridor (IP offshore section):** the offshore cable corridor will not be subject to a permanent safety zone, as this would disrupt vessel traffic. Restrictions will be introduced on a section-by-section basis for the duration of the works. The investor notifies the Maritime Office in Gdynia and the Navy Hydrographic Office of the planned works; on this basis, navigational warnings are published and the conditions for carrying out the works are specified, including a safety zone around the work vessel (up to 1,500 m for a cable-laying vessel) and a ban on fishing and anchoring in the active section. Consequently, the corridor will not be closed in its entirety for the entire duration of construction; the location and duration of closures are determined by the works schedule (Chapter 2.2), which is subject to change.

Furthermore, based on the Environmental Impact Assessment (EIA) for the Investment Project (dated 29 July 2024), the Project is required to undertake a range of information and organisational measures. In particular, this involves conducting information campaigns aimed at local communities and fishermen, including explaining the scope of the investment, potential disruptions and methods of mitigating them. There is also an obligation to publish up-to-date information on planned works, their location, the intensity of vessel traffic and the need to exercise particular caution within the area covered by the investment.

To counteract any potential socio-economic impacts on local stakeholders, the Project is also implementing a temporary voluntary compensation scheme aimed at owners of commercial fishing vessels and operators of marine angling tourism vessels. The aim of this scheme is to mitigate the negative impact of spatial and operational restrictions during the construction and operation phases of the project on those affected by it. A detailed description of the eligibility rules, criteria and method of calculating payments can be found in Chapter 6.

At the same time, to enable effective communication and a response to any needs of local communities, the Investor has launched an active and accessible mechanism for submitting enquiries and claims, which allows for the submission of comments, requests and demands relating to the implementation of the Project. This mechanism, described in detail in Annex 2, operates both electronically (online form, email) and in physical form (suggestion boxes in

government offices and ports) and is one of the key tools ensuring transparency of operations and a response to submissions within the shortest possible time.

5. SOCIO-ECONOMIC CHARACTERISTICS OF THOSE AFFECTED BY THE PROJECT

5.1 Methodology

The socio-economic analysis of those affected by the Project was based on a review of secondary data from reliable national and sector-specific sources. In particular, statistics from the Central Statistical Office (GUS, websites 3 and 4), data from the Local Data Bank (website 5), local strategic and planning documents (including municipal development strategies), as well as information provided by the Investor were utilised. A particularly valuable source of data was the Instrat Foundation's report *'The Restless Baltic'* (Bojadźjewa et al. 2024), which analysed the demographics of over 1,000 people engaged in fishing—a figure which, according to the authors, represents approximately 42.5 per cent of all those working in the Baltic fishing industry. In addition, available industry data on the offshore wind energy sector and data on fishing activity, provided by CMR (Chapter 4), were analysed. This approach enabled the characterisation of the fishing community, which is directly economically exposed to the impacts of the Project. Furthermore, the Investor prepared a spatial analysis (dated 12 May 2025), which provided a broader spatial, environmental, political, social and institutional context for the municipality of Choczewo.

Based on CMR data (Chapter 4.1), three ports were identified to which vessels operating in the fishing squares where the Project's ' ' is planned to be implemented most frequently return: the ports of Władysławowo, Łeba and the Dębki marina. These ports constitute the main logistical base for vessels carrying out fishing activities in the analysed area of the Baltic Sea, and their location determines the intensity and nature of the use of the fishing squares covered by the Project. On this basis, the municipalities in which these ports are situated,

namely Władysławowo, Łeba and Krokowa (Dębki harbour), have been identified as areas inhabited by people exposed to the effects of the Project.

5.2 Description of the municipalities inhabited by people affected by the Project

The demographic and socio-economic profile of the municipalities of Władysławowo, Łeba and Krokowa reveals a number of common features – a relatively balanced gender structure (the proportion of women in the population ranges from 49 per cent to 52 per cent) and a gradually ageing population, with the average age of residents above 42 years. The exception here is the municipality of Krokowa, which has a significantly lower average age – 38.9 years (GUS, Table 5.1).

Table 5.1 Socio-economic characteristics of the municipalities covered by the Project, compiled by the authors based on GUS data

No.	Municipality	Change in population (2015–2024)	Gender structure (F/M)	Average age	Proportion of people of working age	Higher education (proportion)*	Registered unemployment rate (31 December 2024)*	Average monthly gross wage, 2024 (PLN)*
1.	Władysławowo	-8.3%	51 per cent / 49 per cent	42.3	58.3%	21.4%	5.6%	7,692
2.	Łeba	-20%	52 per cent / 48 per cent	46.8	55.6%	22.6%	10.3%	7,500
3.	Step	-1.5%	49 per cent / 51 per cent	38.9	59.5%	21.4%	5.6%	7,692

* Data at county level (Puck County: Władysławowo, Krokowa; Łębork County: Łeba) – the Central Statistical Office (GUS) does not publish these indicators for municipalities. Wages exclude entities with up to 9 employees. Source: GUS, Local Data Bank, <https://bdl.stat.gov.pl> (as at 31 December 2024; education – National Census 2021), accessed: 26 August 2026.

An analysis of population changes over the last 10 years shows a clear trend of out-migration from the municipalities of Łeba and Władysławowo (–20 per cent and –8.5 per cent respectively), whilst the situation in Krokowa has remained relatively stable (GUS).

The educational structure indicates that the proportion of people with higher education remains limited – the highest percentage is recorded in Łeba (22.6%), whilst in the municipalities of Krokowa and Władysławowo it is the same (21.4% each), which points to growing, albeit still limited, access to higher education. In all municipalities, people with secondary or vocational education predominate, which confirms the deep-rooted nature of traditional technical and craft trades (GUS).

The registered unemployment rate at the end of 2024 stood at 5.6 per cent in Puck County (the municipalities of Władysławowo and Krokowa) and 10.3 per cent in Łębork County (the municipality of Łeba), compared with 5.1 per cent nationally. The average gross monthly wage in 2024 was 7,692 PLN in Puck County and 7,500 PLN in Łębork County, i.e. approximately 89 per cent and 87 per cent of the national average respectively, which indicates a moderate level of prosperity among local communities. Data on the unemployment rate and wages are not published by the Central Statistical Office (GUS) at the municipal level; figures for the districts in which the analysed municipalities are located have been used.³

Additionally, it is worth considering the structure of business entities registered in the REGON register. In each of the analysed municipalities, the vast majority (97–99%) are entities with

³ Central Statistical Office (GUS), Local Data Bank, <https://bdl.stat.gov.pl>: category: Labour market/Registered unemployment/registered unemployment rate, as at 31 December 2024 (districts: Puck, Łębork); category: Wages and social benefits / average monthly gross wages, 2024 (districts: Puck, Łębork; Poland). Wage data excludes entities with up to 9 employees. Accessed on 26 August 2026.

an expected workforce of up to 9 people, whilst sole traders account for 79–85% of all registered entities. This points to a fragmented structure of the local economy, based on activities with limited operational scope and capital resources. Data from the analysed municipalities show that the share of firms operating in the agriculture, forestry, hunting and fishing sector remains marginal – hovering around 2 per cent – and among sole traders declaring business activity in this sector, the number does not exceed a few dozen (GUS).⁴

The dominant sectors in the municipalities analysed are accommodation and catering services, as well as wholesale and retail trade, which points to strong links with the tourism sector. In the municipality of Władysławowo, as many as 67.1 per cent of sole traders declare that they operate in the accommodation and catering sector. Similar trends are observed in Łeba, where the majority of businesses operate in the accommodation and catering sectors (61.5%), and in the municipality of Krokowa, where 30.1% of business activity relates to industry and construction, and 30% to accommodation and catering (GUS).

The above data confirm that local economies are fragmented, and that fishing – whilst culturally and symbolically significant – plays a marginal role in terms of the scale of employment and its share in the structure of economic entities. In the context of the Project's implementation, this means that the direct economic impact will affect a relatively small group of stakeholders, albeit one that is heavily dependent on access to marine resources.

Although fishing has historically played a significant role in the development of Kashubia and remains an important element of the region's cultural identity, its economic significance is currently declining steadily. In this context, the Project's impact on the local community may be limited in terms of the scale of its direct effects, but it will be significant for those whose livelihoods depend on the sea. At the same time, the investment may provide an impetus for

⁴ GUS, Local Data Bank, <https://bdl.stat.gov.pl>, category: National Economy Entities / National Economy Entities entered in the REGON register by size class and '...by ownership sector'. As at 31 December 2024. Size classes refer to the projected number of employees declared in the REGON register, not actual employment. Władysławowo: 4,216 out of 4,260 entities (99.0 per cent), Łeba: 1,286 out of 1,305 (98.5 per cent), Krokowa: 1,338 out of 1,380 (97.0 per cent). Accessed: 26 August 2026

the diversification of the local economy and the development of skills in the field of renewable energy, provided that information and training activities are tailored to local social conditions. The diversification process is further supported by the European Fisheries Fund programme for 2021–2027, under which measures are being implemented to provide financial support to fishing vessel owners in developing or launching business activities other than fishing. For example, under Measure 1.3 ‘Diversification of fishing activities’, a call for proposals aimed at fishing vessel owners was held between 30 June 2025 and 21 July 2025, with a total budget of EUR 13,100,000.00.

5.3 Description of the groups affected by the Project

The group most at risk of direct economic displacement as a result of the Project’s implementation is fishermen based in the ports of the municipalities mentioned earlier (Chapter 5.2). Their incomes are closely linked to the availability of specific fishing grounds and the number and efficiency of fishing trips; therefore, any spatial restrictions during the construction or operational phases of the project may affect their financial situation. This applies in particular to vessels operating in waters subject to temporary closures in connection with the implementation of the Project.

At the same time, the data indicate a gradual decline in the sector. The number of people employed in the Polish Baltic fishing industry fell from around 7,000 in 2000 to around 2,400 in 2022, whilst the number of fishing vessels fell from 1,382 in 2004 to 824 in 2022. (Bojadżijewa et al. 2024).⁵ This downward trend was confirmed in an interview with Inwestor by the Chair of the North Kashubian Local Fishing Group (PLGR),² who highlighted the declining number of active fishing vessels and the exodus of young residents from Puck

⁵ Bojadżijewa I., Siwiński P., Rączka J., Orzechowski K., *The Restless Baltic: Polish Fisheries and Offshore Wind Farms*, Instrat Policy Paper 01/2024, Warsaw 2024. Data on the number of people employed include shipowners and crew members; different reference points (2000 or 2004 – the year of accession to the EU) show a decline of approximately 66 per cent and over 35 per cent respectively.

County (the municipalities of Władysławowo and Krokowa). He also pointed out that fishing is a multi-generational tradition and an integral part of local culture.

An analysis of membership in local fishing associations confirms that the group actually affected may be relatively small. In 2024, the PLGR had 129 members from seven municipalities, of whom 43 represented the fishing sector, including an estimated 7 from the municipality of Władysławowo and 5 from the municipality of Krokowa (PLGR 2024). In the municipality of Łeba, the 'Dorzecze Łeby' Local Action Group (LGD Dł) operates; this association, operating under the supervision of the Marshal of the Pomeranian Voivodeship, serves as a platform for cooperation between businesses and local authorities in six municipalities (including Łeba). In 2015, the group had 160 members, of whom 25 represented the fisheries sector (LGD Dł 2021). By 2024, the number of members had fallen to 140 (website 6).

Taking into account the population of the municipalities in question, and assuming that membership of the associations is proportional to the population, this means that the LGD Dł and PLGR have, respectively, 1 person from the municipality of Łeba, 5 people from the municipality of Krokowa and 7 people from the municipality of Władysławowo, all of whom are professionally involved in the fishing sector. Although these are estimates, when combined with the analysed data, they indicate a very small number of people involved in fishing activities. It is estimated that there are only a dozen or so associated fishermen in the analysed area.

Research carried out for offshore wind projects in the region shows that extended fish closed seasons and low catch limits are forcing fishermen to seek other sources of income. It is estimated that around half of them may have additional sources of income, a large proportion of whom opt for marine tourism (Bojadżijewa et al. 2024). However, interviews with representatives of harbour master's offices indicate a declining number of recreational sea-fishing vessels, due to the ban on fishing for cod and other species popular amongst customers of fishing trips, such as salmon or eel.

On 26 September 2025, the Sejm of the Republic of Poland passed *an Act on state aid for vessel owners in connection with the introduction of a ban on cod fishing in the Baltic Sea* (Journal of Laws 2025, item 1540), which is of particular significance to recreational fishing vessel owners who were not covered by earlier compensation schemes intended for professional fishermen. According to information obtained from harbour master's offices, a significant number of vessel owners have taken advantage of statutory compensation in exchange for scrapping their vessels.

The activities of recreational sea fishing vessels constitute the least well-documented area relating to fishing. In accordance with the regulations, anglers – the customers of these vessels – are responsible for reporting catches to the Main Inspectorate of Sea Fisheries. The information reported should include:

- the quantity and species of marine organisms caught or overfished;
- the date and area where the fishing took place;
- the type and number of fishing gear used.

Furthermore, where recreational fishing is carried out from a vessel in the open waters of the Baltic Sea, the exclusive economic zone and the territorial sea, Puck Bay and Gdańsk Bay, the person taking part in the trip must, at least two hours before the start of recreational fishing, send the following information to the email address provided on the website of the Chief Inspector of Marine Fisheries:

- the name of the vessel, and in the case of a fishing vessel – its fishing mark and name, if assigned;
- the date and time of the start of recreational fishing;
- the fishing area or the port from which the voyage for recreational fishing commences.

According to information obtained from the GIRM, recreational fishing permits are not currently being issued to vessels or shipowners; consequently, no records are kept of the number of trips.

The information obtained indicates an almost complete decline in recreational sea angling activity, whilst such offers are still available in ports or online. According to information

obtained from the fishing community, during periods of high activity amongst vessel owners offering recreational fishing trips, these trips mainly took place within a 3-nautical-mile zone from the coastline. Organising trips to areas several dozen kilometres from the coastline was not economically viable.

Given the very limited scope for verifying the activities in question, it is extremely difficult to assess the actual activity of sea fishing vessels. Consequently, the assumptions used to estimate potential losses resulting from the construction of the BC-Wind Offshore Wind Farm and its connection infrastructure were based on a proprietary method.

Among the groups identified as vulnerable to the project's impacts are also the crews of fishing vessels, for whom reduced access to fishing grounds could potentially result in a reduction in earning potential. Restrictions linked to bans on fishing for cod and other popular commercial species, introduced in 2020, have reduced the attractiveness of employment in the fisheries sector. The decline in cod and other popular species in the Baltic Sea, which underpinned the fishing bans, has resulted in a lack of opportunities for stable and secure employment in the fishing industry. According to the information obtained, as a result of the exodus of crew members from the sector, fishing vessels are now crewed by people working on multiple vessels, for whom employment in the fishing industry is not their sole source of income. There is also a high turnover of staff, whilst vessel owners rely on foreign workers. Due to high labour costs, crew members' employment is not always formalised, being based on various forms of employment.

Under the European Fisheries Fund programme for 2021–2027, Priority 1.7: Permanent cessation of fishing activities (loss of employment on a fishing vessel), support was also directed towards crew members of fishing vessels who lost their existing jobs as a result of vessels being taken out of service and the permanent cessation of fishing activities. The compensation received provided these individuals with a form of support in connection with the need to leave their profession or find an alternative source of livelihood.

According to government data^{6,7}, as part of the call for applications organised in late 2023 and early 2024, the total number of applications for compensation payments relating to job losses reached approximately 350. According to data from the Central Statistical Office (2025), at the start of 2023, the number of people employed as crew on 123 fishing vessels stood at 500–600, whilst the total number of people employed in the fishing industry was 2,364 fishermen. The most drastic fall in employment occurred between 2023 and 2024, i.e. during the period when applications were being accepted for compensation for the scrapping of fishing vessels and the loss of jobs amongst their crews. According to estimates by the Central Statistical Office (GUS, 2026), between 2025 and 2026, the number of people employed in the fishing industry fell below 1,800. The data presented describe trends and the situation in the fisheries sector at a national level; due to a lack of detailed data, it is not possible to make a precise reference to the situation in ports key to the BC-Wind project, in particular the ports of Władysławowo and Łeba.

5.4 The role of EU sectoral funds in stabilising the social situation of fishermen

Following its accession to the European Union, Poland became subject to the regulations of the Common Fisheries Policy, which resulted, amongst other things, in a profound restructuring of the Polish sea fishing industry. The changes affected, amongst other things, the fishing fleet. From 2004, an intensive process of reducing the Polish fishing fleet began, as its capacity was deemed too large in relation to the dwindling fish stocks in the Baltic Sea. In the long term, this proved particularly significant for cod stocks – the ban on commercial and recreational fishing is discussed in section 3.1 of this

⁶ List of proposals for evaluation No: FEDR.01.07-IP.01-002/23.

https://www.funduszeunijne.gov.pl/media/127564/Listawnioskow_doooceny_z_dn_09_01_2024.pdf

⁷ List of applications for assessment No: FEDR.01.07-IP.01-004/23,

https://www.funduszeunijne.gov.pl/media/129155/Listarankingowa_1_7_2024_02_08.pdf

document. The size of the Polish fishing fleet has also decreased significantly, from around 1,400 vessels at the time of EU accession to over 600 today.

A key factor in carrying out the restructuring described above was the Polish fisheries administration's facilitation of sea fishermen's extensive use of the opportunities created by successive editions of operational programmes containing sectoral EU funds targeted at sea fisheries:

- The Sectoral Operational Programme 'Fisheries and Fish Processing 2004–2006', based on funding from the Financial Instrument for Fisheries Guidance (2000–2006);
- the Operational Programme for the Sustainable Development of the Fisheries Sector and Coastal Fishing Areas 2007–2013 (PO RYBY), based on the European Fisheries Fund;
- Operational Programme 'Fisheries and the Sea' (OP Fisheries 2014–2020), funded by the European Maritime and Fisheries Fund (EMFF)
- the national programme 'European Funds for Fisheries' for 2021–2027, based on the European Maritime, Fisheries and Aquaculture Fund (EMFAF)

In each of the comprehensive financial support instruments for the fisheries sector listed above, within the limits permitted in each case by the relevant EU legislation and the national regulations implementing it, sea fishermen have been able to make extensive use of measures designed to improve the situation of their businesses or to mitigate the negative effects of the difficulties they face in carrying out sea fishing. Typical measures of this kind include subsidies supporting:

- the permanent cessation of fishing activities resulting from fishing capacity that is structurally excessive in relation to available fish stocks;
- the temporary cessation of fishing activities resulting from the short-term and reversible unavailability of fish stocks;
- support for the occupational diversification of sea fishermen through training and assistance in setting up business activities as an alternative to fishing;
- the modernisation of fishing vessels in a manner that does not increase their fishing capacity, aimed, amongst other things, at improving safety and working conditions at sea;

- the establishment and operation of Local Fishing Groups – the activities of these locally significant groups are addressed in section 5.2

In view of the above, and taking into account the local and limited scale of the Project's impact on the fishing environment, this Livelihood Restoration Plan focuses on an in-depth analysis of the Project's impact on fishing activities at sea and the associated possibilities for applying dedicated compensation measures, which are complementary to the broad and comprehensive measures described above.

SUMMARY

Over the past two decades, fishing along the Baltic coast has declined significantly, both in terms of the number of active vessels and the number of people earning a living from this activity. This phenomenon is not the result of a single factor, but rather the effect of long-term regulatory, environmental and economic processes which have gradually pushed traditionally operating fishermen out of the mainstream of local economic activity. Increasingly difficult access to resources and a changing legal framework have contributed to the loss of stability in this profession, which until recently defined the identity of many coastal communities.

Although fishing remains deeply embedded in the region's cultural consciousness and retains its symbolic status, its role as a genuine pillar of the local economy is being marginalised. As a result, we are seeing younger generations moving away from continuing family traditions and showing a growing tendency to seek alternative forms of livelihood – often outside the maritime sector..

In this context, the Project may have a noticeable impact on these groups during the construction phase. In accordance with the schedule (Chapters 2.2 and 8.2), restrictions on the use of the marine area will be introduced in stages: from August 2026 in the area where the cable comes ashore (HDD drilling), from December 2026 in the OWF area (seabed preparation for foundations, followed – from March 2027 – by the installation of foundations, the offshore station, internal cables and turbines, until July 2028), and from August to November 2027 in the export cable

corridor. In total, this amounts to approximately two consecutive years of temporary closures of parts of the maritime area; the OWF area will remain off-limits for the entire approximately 16-month installation period, whilst the cable corridor will be off-limits for approximately 3 months during cable laying.

6. NON-FINANCIAL MEASURES SUPPORTING LOCAL DEVELOPMENT.

Throughout the Project's development phase, non-financial measures were undertaken with the aim of supporting local development and preserving the culture of communities traditionally linked to the fisheries sector.

The proposed measures were the subject of individual consultations with representatives of the fishing community, during which the views of the local community were decisive regarding the implementation of the discussed initiatives. Concepts for non-financial support were also discussed within the Fisheries Working Group of the Polish Wind Energy Association.

Key issues relating to non-financial support for fishing communities included proposals to support the retraining of fishermen to enable them to take up employment in the offshore wind energy sector. In collaboration with the training company WindHunter, a programme of GWO (Global Wind Organisation) training courses was developed, covering occupational safety (working at height, fire risk awareness, first aid, manual handling, and survival at sea). The training programme was presented during the conference 'Fishing and Wind Energy in the Baltic Sea: Challenges and Opportunities', organised in Władysławowo on 22 October 2024 by the Instrat Foundation and the North Kashubian Local Fisheries, during which representatives of OW Polska presented the BC-Wind offshore wind farm project and took an active part in discussions with the fishing community.

Representatives of the fishing community pointed out that, due to the age structure of the occupational group and the nature of the work carried out to date, training programmes enabling retraining for work on offshore wind farms do not meet their current needs. At the

same time, it was noted that financial compensation is the preferred form of compensatory measures.

The Investor's measures aimed at preserving the culture of communities traditionally linked to fishing were met with approval from the local community. In collaboration with the North Kashubian Fishing Group and the associated Baltic Sea Folk University in Władysławowo, a ceramics craft workshop entitled 'A Fisherwoman's Handicrafts' was organised, during which participants created functional items that were once used by communities in the Norda region (the northern region of Kashubia) for storing, preserving and preparing fish and traditional fishermen's dishes⁸.

As part of a collaboration with the Investor, PLGR and the Coastal People's University in Władysławowo, a two-day workshop entitled "THE FISHERMAN'S CRAFT - GLASKÙŁ BRAIDING" was organised in early 2026. The concept of the workshops forms part of the aim to halt the decline of traditional fishing crafts. Under the guidance of masters of traditional fishing crafts, participants learnt the technique of braiding glaskùł, or glass fishing buoys. A workshop on weaving baskets using wicker and pine shoots was also organised, drawing on traditional craft techniques associated with the local fishing culture.

⁸ Niemkiewicz, P., 2025. *This is how fishermen used to work, and today their lives are a subject for sculptors. 'A Fisherwoman's Handicraft' - unique pottery workshops in Władysławowo* at puck.naszemiasto.pl. Source: <https://puck.naszemiasto.pl/this-is-how-fishermen-used-to-work-and-today-their-lives-are-a-source-of-inspiration-for-sculptors-a-fisherwoman-s-handicraft-unique-ceramics-workshops-in-Wladyslawowo/ar/c13p2-28297789>

7. COMPENSATION SCHEME

The compensation scheme adopted is of a transitional nature. Should the Act on State Aid for vessel owners come into force in connection with the introduction of a ban on cod fishing in the Baltic Sea, or should a uniform compensation scheme (Chapter 3.2) be introduced, the compensation scheme will be adapted in accordance with the provisions adopted.

The methodology set out in this chapter constitutes a proposal for a compensation scheme for disruptions to fishing activities caused by the construction of the farm. It has been developed on the basis of available VMS data, catch data and the findings of the EIA report. The final parameters of the scheme, in particular those relating to the reference period, eligibility criteria and the values of selected coefficients, will be the subject of consultation during meetings organised in ports that are key to the Project's impact, namely in Łeba and Władysławowo. For the purposes of these meetings, sample calculations of compensation will be prepared based on the formulae given below.

7.1 General provisions

Compensation is payable as a one-off payment for eligible losses or additional costs incurred during the period in which restrictions relating to the construction of the BC-Wind offshore wind farm are in force. This period begins on the date on which the restrictions affecting fishing activities are actually introduced and ends on the date they are lifted following the completion of the MFW's construction. The dates and scope of the restrictions should be confirmed on the basis of the current construction schedule, navigational notices and decisions by the competent authorities.

The compensation mechanism for lost profits is intended exclusively for fishing vessels operating under the Polish flag, provided that the eligibility criteria described later in this

document⁹ are met. Contacts with the fishing community did not indicate any fishing activity by foreign vessels. No foreign owner of a fishing vessel has contacted the Investor regarding compensation for losses resulting from the construction of the offshore wind farm.

In accordance with national regulations, fishing operations may not be carried out by vessels that do not meet the requirements set out in the legislation governing the fisheries sector. Consequently, the compensation scheme in question excludes vessel owners who are unable to provide evidence of fishing activity.

Compensation is available only for documented losses or disruptions, understood as losses confirmed by fishing data officially reported to national authorities and/or scientific institutions, incurred by owners of fishing vessels flying the Polish flag.

Compensation calculations are made in PLN, with the EUR-PLN conversion based on the medium-term exchange rate of 1 EUR = 4.3 PLN.

Investment Area (IA) – the maritime area reserved for the BC-Wind investment in fishing squares O6, O7, O8, P7 and P8.

Formulas 1 and 2 are based on access to detailed fisheries data from the CMR.

Detailed rules for the eligibility of vessels for specific mechanisms and the procedure to be followed in the event of several types of damage occurring simultaneously should be set out in the compensation scheme regulations, which will be published on the Project's website.

Given the very high likelihood that the ban on cod fishing will continue throughout the construction period of the Investment, a reference period corresponding to the period during which neither targeted commercial fishing nor recreational fishing for this species was possible has been adopted for all formulas. The final form of the compensation scheme will be published following a series of public consultations involving representatives of the fishing community.

⁹ IFC Performance Standard 5, § 5: the provisions of PS5 also apply in the event of loss of or restricted access to marine resources that constitute a source of livelihood.

In the case of joint ownership of a fishing vessel, compensation is payable to each co-owner in proportion to their share in the ownership of the vessel. A fishing vessel owner applying for compensation under this mechanism may not simultaneously benefit from support under Priority 1.7 'permanent cessation of fishing activities'.

In the case of a vessel used for recreational fishing which is applying for compensation under this scheme, it is not possible to simultaneously benefit from aid granted under the Act of 26 September 2025 on State aid for vessel owners in connection with the introduction of a cod catch limit in the Baltic Sea.

7.2 Definitions: Fishing licence and Special fishing permit

The following definitions are based on the Act of 19 December 2014 on sea fisheries (consolidated text: Journal of Laws of 2025, item 590)

Fishing licence – an administrative decision issued by the minister responsible for fisheries at the request of the owner of a fishing vessel, which is a prerequisite for carrying out commercial fishing. The conditions for issue are: the vessel being entered in the register of fishing vessels; the vessel owner having their registered office or place of residence within the territory of Poland; the vessel being of Polish registration; and the vessel not being deemed to have been withdrawn from commercial fishing. The content of the licence is set out in Annex II to Council Regulation (EC) No 404/2011 (Chapter 4 of the Act, Articles 36–40).

Special fishing permit – an authorisation granted to the owner of a fishing vessel to carry out fishing within the meaning of Article 4(10) of Council Regulation (EC) No 1224/2009, specifying the quotas for marine organisms allocated to the vessel owner for a given vessel and year (an individual catch quota or the number of fishing days). It may be suspended or revoked by a decision of the issuing authority, inter alia, in the event of breaches of commercial fisheries regulations (Articles 41–43 of the Act).

To carry out commercial fishing, one must hold BOTH documents – a fishing licence AND a special fishing permit – issued for a specific vessel for the duration of the MFW's construction.

7.3 Compensation Formula No. 1 – direct losses incurred by fishing vessels in Area IA

Eligibility criteria (all must be met):

- a) documented commercial catches in squares O6, O7, O8, P7 and P8 reported to the CMR during the specified reference period, 2022–2025
- b) a valid fishing licence for the construction period of at least 1 year,
- c) a valid Special Fishing Permit for a construction period of at least 1 year,
- d) acceptance of the terms of the Compensation Agreement,
- e) successful provision to the Investor of the vessel's individual, de-identified catch data (on the basis of a power of attorney) and the vessel owner's personal and/or corporate data, necessary for the payment of compensation,
- f) vessel owners and owners of vessels currently undergoing scrapping are excluded from the scheme.

1 equation Formula No. 1 for fishing losses

$$C1 = RCV * A\% * CON/365d$$

where;

C1: Amount of compensation (Formula No. 1)

RCV: Registered Catches' Value – the arithmetic mean of the annual value of catches recorded for a given vessel in squares O6–P8 in the years 2022–2025, calculated as volume × EUMOFA monthly first-sale prices for the ports of Władysławowo and Łeba (*Table 4.4*)

A%: the percentage coverage of each square by the Investment Area (IA) and its impacts (construction noise, sediment dispersion, prevention of the use of fishing gear); see *Table 7.1* below.

CON/365d: the number of actual construction days during the period covered by compensation / 365 calendar days of the relevant construction year

Table 7.1 Comparison: actual physical coverage of the IA area (geometric calculation) vs. the proposed A% for the formula

Square	Actual IA coverage	A% – proposed value (for formula C1)
O6	0.24%	x%
O7	2.93%	x%
O8	6.19%	x%
P7	0%	x%
P8	14.32%	x%

The final value of the coefficient x in the table below will be determined following discussions with the fishing community based on the Investor's proposal. It will be differentiated for vessels with an overall length of <12m and >12m, in favour of the former. The reason for this is that these vessels are unable to benefit from compensation calculated using Formula No. 2, due to a lack of VMS data for them.

7.4 Compensation under Formula No. 2 – extension of routes to fishing grounds

Eligibility criteria (all must be met):

- Confirmed transit through the Investment Area (offshore area) in the years 2022–2025, based on an analysis of individual VMS data (routes, waypoints, times, speed)
- A valid Licence and Special Permit for the construction period
- acceptance of the terms of the Compensation Agreement,
- provision of VMS data and shipowner details.
- Shipowners and owners of vessels currently undergoing scrapping are excluded from the selection process.

Calculation formula:

$$C2 = (\delta T \times OC) * i * CON / 365d$$

Where,

C2: Amount of compensation (Formula No. 2)

δT : estimated increase in flow time (steaming) in hours

Note: estimated increase in flow time, representing the additional distance to be covered when bypassing the Investment Area rather than flowing straight through it. A simplification has been applied: detour distance = half the perimeter of the IA area (49.21 km/2 $\approx$ 24.61 km), divided by the median transit speed of vessels in the area as measured from VMS data (7.8 knots):

$\delta T = (0.5 \times \text{perimeter of the IA}) / v_{\text{transit}} = 24.61 \text{ km} / 14.4 \text{ km/h} \approx 1.71 \text{ h}$ (one-way) or 3.42 h (there and back, assuming the vessel returns via the same route). The IA circuit (49.21 km) encompasses the B-Wind and C-Wind areas (PSZW 2022) in total, treated as

OC – the vessel's hourly operating cost [EUR/h] was calculated using the formula:

$$OC = \frac{FC_{das} \times 4}{24}$$

where:

- $FC_{das} = [689]$ EUR/day – average daily fuel cost for a large fleet, according to data from [STECF AER 2024],
- $\times 4$ – conversion of the fuel cost to the total operating cost, assuming that fuel accounts for approximately 25% of the vessel's total operating costs,
- $\div 24$ – conversion of the daily cost to an hourly cost.

OC: hourly operating cost of the vessel = $(FC_{das} \times 4) / 24$, where FC_{das} = EUR 689 (average daily fuel cost according to the 2024 STECF AER¹⁰ for a large EU-wide fleet), $\times 4$ because fuel accounts for ~25% of total costs, divided by 24 hours to obtain the hourly value.

i: the number of transits (transit episodes) of a given vessel through the Investment Area in a given year. Calculated on the basis of the VMS item grouping method.

CON/365d: the number of actual construction days during the period covered by compensation / 365 calendar days of the relevant construction year

Note:

- The number of passages (i) may be slightly underestimated in cases of very short, rapid transits through the area if no VMS position was recorded during such a transit (with a median interval between positions of approximately 40 minutes).
- The solution adopted is an average and does not reflect the actual routes of individual vessels. In practice, the actual route extension may be either shorter or longer, depending on the location of the port, the position of the fishing ground, the current stage of construction and the organisation of vessel traffic.
- The aim of the model used is not to recreate the course of individual routes, but to provide a uniform and repeatable method for estimating the additional transit time for the entire fleet under analysis.
- It should be emphasised that the compensation determined by Formula 2 relates exclusively to the additional operating costs resulting from the extension of the transit route between the port and the fishing ground. This mechanism does not compensate for the loss of revenue from fishing activities, which is the subject of Formula No. 1. Consequently, the two mechanisms relate to different categories of economic impact and should be applied in accordance with the scope of the damage incurred.

¹⁰ See <https://publications.jrc.ec.europa.eu/repository/handle/JRC139642>, p. 41.

7.5 Compensation Formula No. 3 – disruption and losses suffered by organisers of recreational fishing trips

Note: this compensation scheme applies to recreational/fishing trips, not commercial fishing. It is not possible to provide or verify catch data from the CMR. In view of the above, the methodology for calculating compensation for disruption and losses suffered by organisers of recreational fishing trips is based on the Contractor's analysis of the following categories of data, documentation and information:

- Analyses of Polish recreational fisheries conducted by research institutions, primarily MIR-PIB, as part of the EU's Data Collection Framework (DCF);
- The regulatory framework for recreational fishing under Polish and EU legislation;
- Data from harbour masters' offices and/or boatmasters' offices at fishing ports regarding voyages at sea constituting fishing trips;
- Publicly available, up-to-date offers from organisations organising recreational fishing trips, particularly regarding: the seasonality of trips and target species, trip prices, and trip durations;
- A GIS analysis comparing ICES squares within the range of recreational vessels in the investment area;

Eligibility criteria:

- a) a licence to organise recreational fishing (Article 90(1)(1) of the Marine Fisheries Act) valid for the years 2022–2025;
- b) a registered seagoing vessel with a valid class certificate (PRS or equivalent);
- c) confirmed fishing trips in the Baltic Sea (port captain's or harbour master's register and/or catch reports submitted to the relevant Marine Fisheries Inspectorate);
- d) History of catches reported to GIRM;
- e) operations from the ports of Łeba and Władysławowo
- f) Shipowners and owners of vessels currently undergoing scrapping are excluded from the selection process.

Calculation formula:

3 equation – organisers of recreational fishing trips

$$C3 = ACC * NC * IA\% * CON/365d$$

Where:

C3: Amount of compensation (Formula No. 3);

ACC: average cost of a fishing trip (salmon, sea trout, garfish, herring) – the arithmetic mean of prices publicly available on the specified shipowners' websites, as at August 2026;

NC: the average annual number of voyages per vessel for the years 2022–2025, determined on the basis of voyages recorded by the port authorities to which the formula applies;

IA%: the relative importance of the Investment Area for recreational fishing, calculated as follows:

$$IA\% = IA/AA * IM * 100\%$$

Where

IA: Investment Area, expressed in km²;

AA: the area of waters accessible for the organisation of recreational fishing trips, determined on the basis of the assumed maximum duration of a single trip, taking into account publicly available offers (15 hours), the assumed vessel speed (x knots), and the corresponding marine area of the ICES statistical squares (38G6, 39G6, 38G7, 39G7, 39G8, 38G8), expressed in km² (17,913.9 km² excluding the land area);

IM: the Investment Area significance multiplier, with a value of [to be agreed during negotiations], reflecting its importance for the fishing of the main species targeted by recreational angling trips, in particular: sea trout, salmon, garfish and herring;

100%: a factor added for mathematical reasons to obtain the percentage value of the main formula component IA%.

$$IA\% = (76.33 / 17\,913.9) \times 10 \times 100\% = 4.6\%$$

CON/365d: as in Formula No. 1.

7.6 Crew members of fishing vessels

Crew members of fishing vessels should provide evidence of job loss resulting from fishing restrictions caused by the construction of the BC-Wind offshore wind farm, by presenting their seaman's book and providing proof of employment on a vessel operating within the fishing zones covering the location of the offshore wind farm, by means of an employment contract, a contract for services or a contract entered into as part of a sole trader's business. The amounts of compensation for documented loss of employment will be presented during public consultations; the agreed amounts will be published in the rules governing the submission of applications for compensation payments.

7.7 Deadlines for submitting applications

The call for applications is announced by the Investor,¹¹ . The announcement, together with the programme's terms and conditions, is published on the Project's website prior to the opening of the call and specifies the deadlines, channels for submitting applications and a list of required supporting documents (Chapter 6.7). . Information on the calls for applications will also be displayed on posters at key home ports of fishing vessels operating within the BC-Wind MFC area and at local council offices.

The timeframe for the call for applications for the construction phase is based on the Plan's implementation schedule (*Table 9.2*):

¹¹ IFC Performance Standard 1: the requirement to disclose material information about the Project in a manner that is accessible and understandable to affected groups.

- the call for applications, their verification and the signing of compensation agreements will take place from the completion of work on the parameters of the compensation scheme until the end of 2026 (*Table 9.2*, item 8);
- compensation will be paid into beneficiaries' accounts in the first quarter of 2027 (*Table 9.2*, item 9).

The call for applications will open following the conclusion of the second round of consultation meetings (*Table 9.2*, item 7) and after the programme rules have been published. The exact dates for the opening and closing of the call for applications will be specified in the announcement. The closing date for applications is set so that the verification of applications and the signing of agreements are completed by the deadline specified in the timetable (*Table 9.2*, item 8).

Submission of an application by the deadline is a condition for its consideration; applications submitted after the deadline will not be considered (Chapter 6.7). The deadlines for rectifying formal deficiencies and for reconsideration are set out in the programme regulations.

The application deadlines for the subsequent stages of the Project's implementation (operation, decommissioning) will be set out in the updates to the Plan referred to in Chapter 1.

7.8 The process for receiving and assessing applications for compensation

This sub-section describes the procedure for processing applications for compensation. The process is conducted in accordance with the rules of the compensation scheme, which are published alongside the call for applications. The rules set out the deadlines, document templates and the procedure for appealing against decisions.

Four parties are involved in the process:

- **The applicant** (shipowner) – submits the application together with the supporting documents, including – for Forms 1 and 2 – a power of attorney. Following a positive decision, the applicant signs the agreement.
- **The Contractor** – manages the application submission channels, carries out a formal check, requests data from the CMR, conducts a qualification test and calculates the amount of compensation in accordance with the methodology (Chapters 6.3–6.5).
- **The Fisheries Monitoring Centre** – provides individual VMS data and the vessel's catch data on the basis of a power of attorney granted by the applicant.
- The Investor announces the call for applications, publishes the terms and conditions, decides on the award of compensation and makes the payment.

The process design separates verification from decision-making. The contractor verifies the applications and makes a recommendation; the final decision rests with the Investor. Verification is based on data from state registers. The sequence of the process and the division of tasks are shown in Figure 6.1.

The agreement is concluded in accordance with a standard template, which is uniform for all beneficiaries, and is not subject to individual negotiation. The main provisions of the agreement include: the amount of compensation calculated in accordance with the published methodology (Chapters 6.3–6.5), the date and method of payment, the scope of settlement limited to the compensated loss of income during the construction period, and the rules for the processing of personal data.

The agreement does not contain any provisions that might discourage those entitled to enter into it. In particular, it does not impose any obligations of confidentiality or to refrain from commenting on the Project, nor does it restrict access to the mechanism for submitting queries and claims (Annex 2) or to administrative and judicial remedies, nor does it impose obligations going beyond those arising from generally applicable law, such as compliance with navigational restrictions established by the maritime authorities.

Signing the agreement is a condition for the payment of compensation, not an eligibility criterion – refusal to enter into the agreement does not affect the outcome of the eligibility assessment.

Proces wnioskowy: Wzór 1 i Wzór 2 – sekwencja

	Wnioskodawca (armator)	Wykonawca (Secgen + SeaClouds)	CMR (MRiRW)	Inwestor (C-Wind)
1. Nabór		Obsługa kanału elektronicznego i punktów w portach		Ogłoszenie naboru; publikacja regulaminu i wzorów
2. Wniosek	Złożenie wniosku z pełnomocnictwem i załącznikami; podpisy			
3. Ocena formalna		Kontrola formalna: dokumenty, podpisy, licencja, zezwolenie, pełnomocnictwo		
4. Dane połowowe		Wystąpienie o dane na podstawie pełnomocnictwa	Udostępnienie indywidualnych danych VMS i połowowych	
5. Kwalifikacja		Test kwalifikacyjny TAK / NIE		
6. Wyliczenie i decyzja		Wyliczenie wg metodyki; rekomendacja		Rozstrzygnięcie o przyznaniu rekompensaty
7. Porozumienie i wypłata	Podpisanie porozumienia z załącznikiem – wyliczeniem kwoty	Uzyskanie podpisów; pakiet dokumentacji do wypłaty		Wypłata rekompensaty

Figure 7.1 Sequence of the application process and division of tasks (Templates No. 1 and No. 2)

The assessment of an application takes the form of a sequence of steps. A negative outcome at any stage terminates the application process. The consequence depends on the nature of the shortcoming:

- failure to meet the deadline – results in the application being left unexamined,
- a formal deficiency – results in a request to provide additional information within a specified time limit; and failure to meet a substantive requirement – results in a rejection.

An application for reconsideration of the decision may be made in accordance with the procedure set out in the regulations (Annex 2, point 7); objections to the method of calculating the amount may be raised in accordance with the procedure described in Annex 2, point 7.

Steps 1–4 (deadline, completeness of documents and signatures, fishing licence and special fishing permit, valid power of attorney for the relevant CMR) are common to Forms 1 and 2. The subsequent steps differ between these forms: for Form No. 1, this involves documented fishing activity in the Investment Area during the reference period 2022–2025 (Figure 6.2). The vessel's home port is not an eligibility criterion.

Wzór nr 1 – bezpośrednie straty w obszarze inwestycji: test kwalifikacyjny

Sekwencja kroków. Wynik negatywny któregośkolwiek kroku kończy bieg wniosku – z prawem do wniosku o ponowne rozpatrzenie.

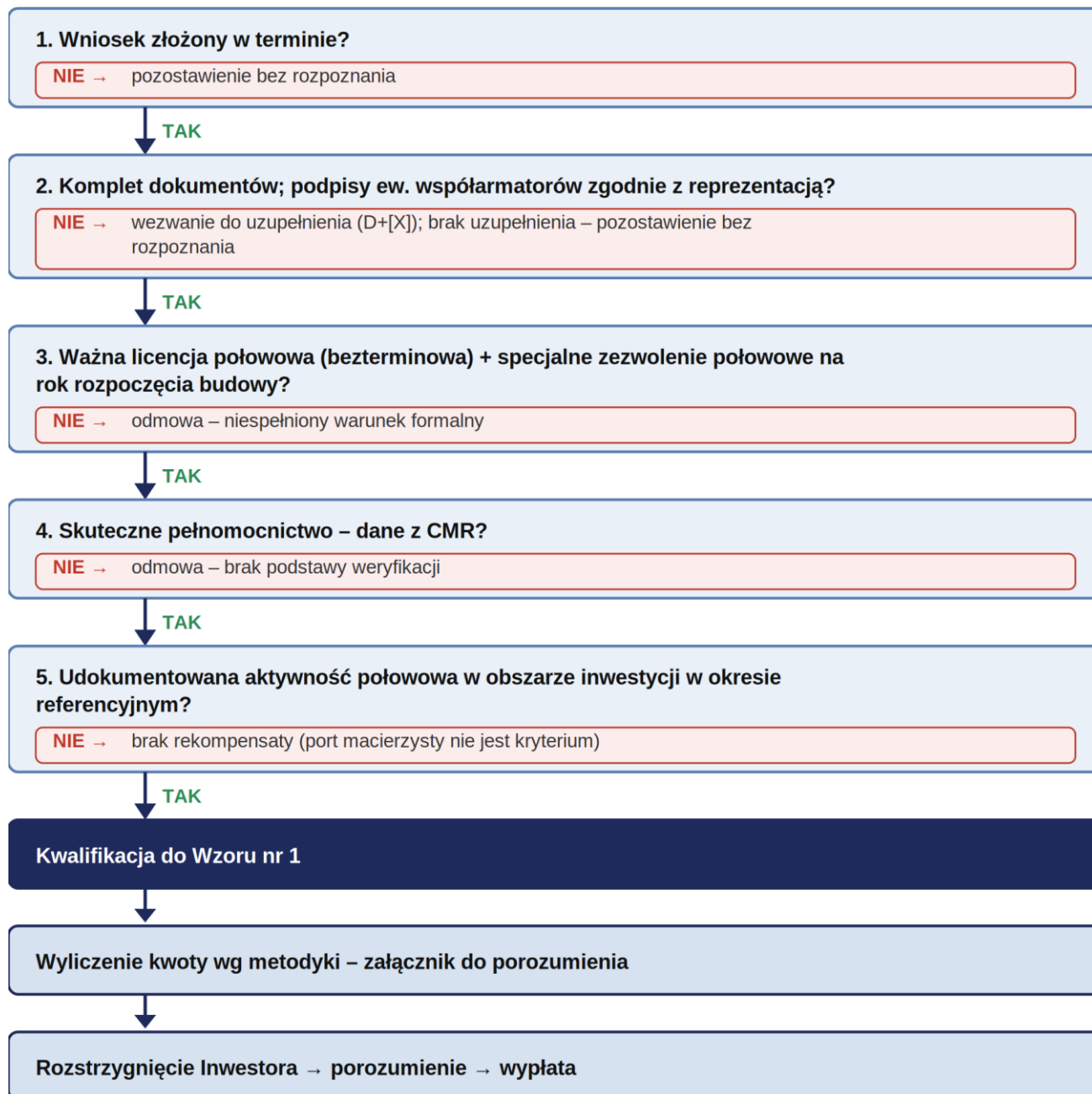


Figure 7.2 Eligibility test – Template No. 1

For Formula No. 2, the relevant criteria (which differ from those in Formula No. 1) are:

- the vessel's passage through the Investment Area in the years 2022–2025, as confirmed by individual VMS data
- the link between transit and voyages to fishing grounds (Figure 6.3).

The second criterion serves to filter out vessels that are purely in transit, whose passage through the area is not linked to fishing activities. The mere fact of passage does not entitle the vessel to compensation.

Wzór nr 2 – wydłużenie tras dojścia do łowisk (tranzyt): test kwalifikacyjny

Sekwencja kroków. Wynik negatywny któregośkolwiek kroku kończy bieg wniosku – z prawem do wniosku o ponowne rozpatrzenie.

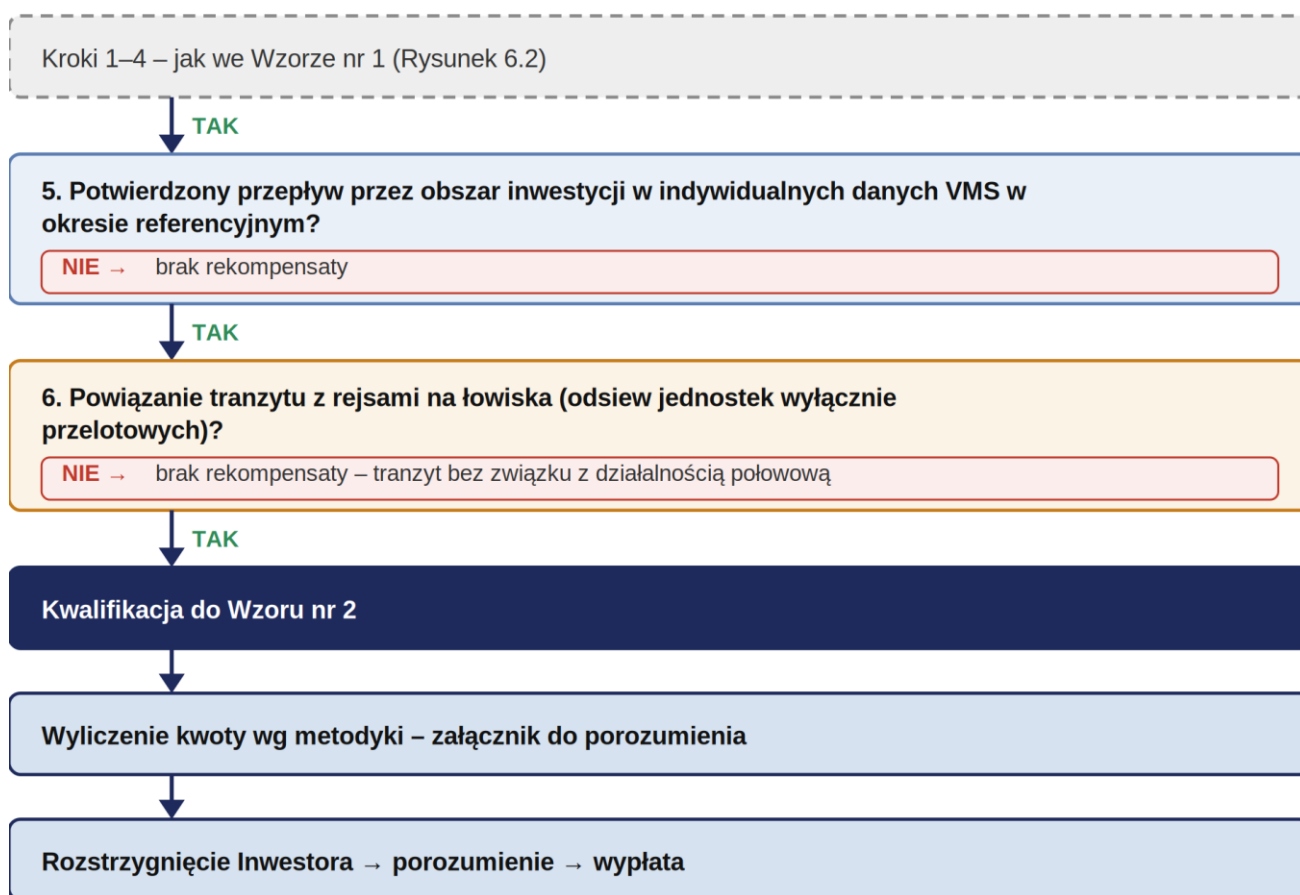


Figure 7.3 Eligibility test – Formula No. 2

Form No. 3 applies to organisers of recreational fishing trips and follows a separate data pathway. The CMR pathway does not apply here: a fishing licence, a special fishing permit and authorisation for CMR data are not required. Instead, the criteria specific to this segment are verified. Verification is based on port registers and reports submitted to the relevant Marine Fisheries Inspectorate.

The eligibility criteria are:

- a licence to organise recreational fishing (Article 90(1)(1) of the Marine Fisheries Act) obtained between 2021 and 2025,
- a registered seagoing vessel with a valid class certificate (PRS or equivalent),
- confirmed fishing trips in the Baltic Sea (port captain's or harbour master's register, catch reports submitted to the relevant Marine Fisheries Inspectorate),
- operating from the ports of Łeba or Władysławowo (Figure 6.4).

Wzór nr 3 – rekreacyjne rejsy wędkarskie: test kwalifikacyjny

Sekwencja kroków. Wynik negatywny któregośkolwiek kroku kończy bieg wniosku – z prawem do wniosku o ponowne rozpatrzenie.

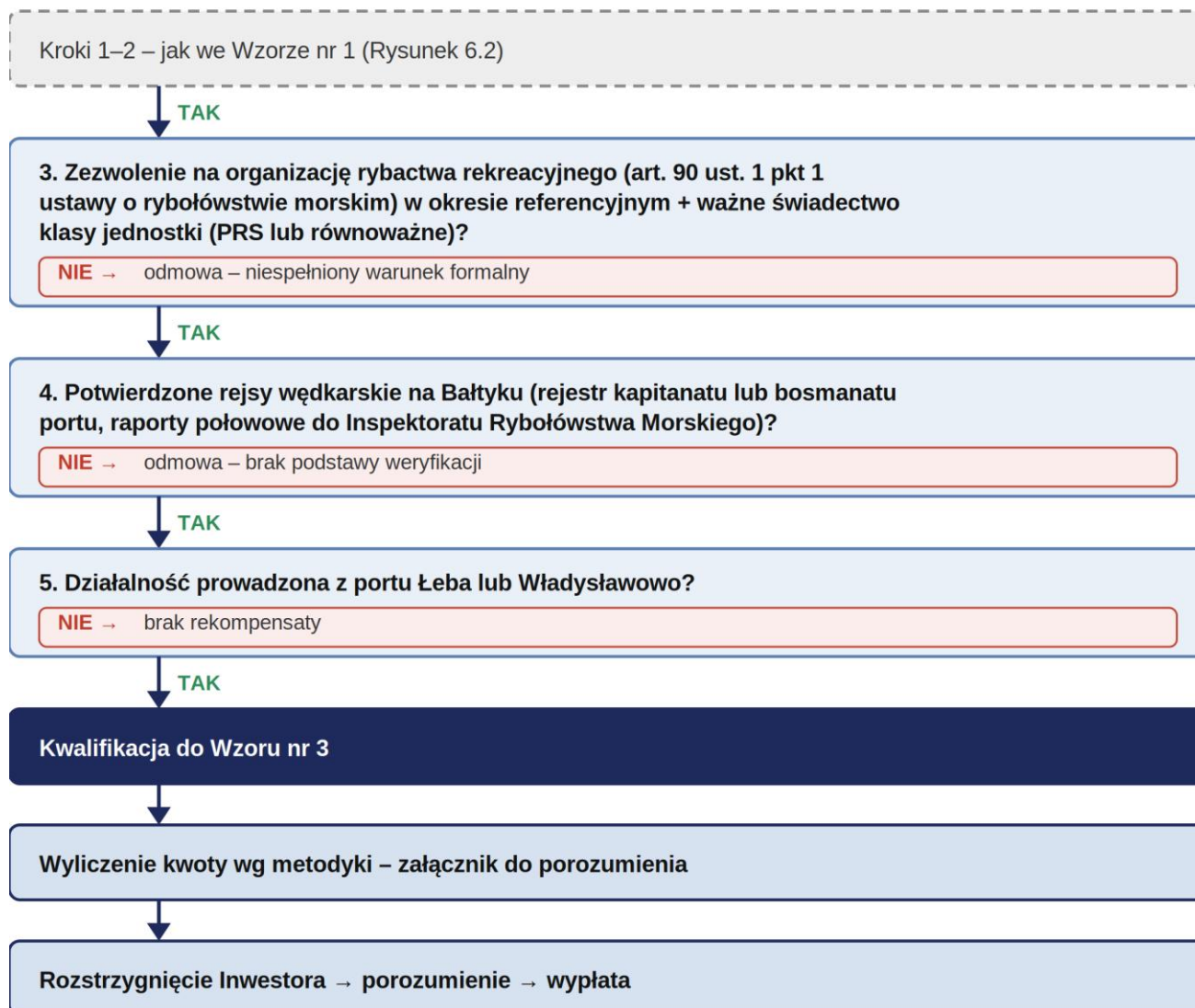


Figure 7.4 Eligibility test – Template No. 3

The remainder of the process – calculation of the amount in accordance with the methodology (Chapters 6.3–6.5), the Investor’s decision, agreement and payment – is common to all templates.

The amount of compensation is calculated following a positive result in the eligibility test and is set out in an annex to the agreement. Payment is made following the signing of the agreement by the parties , in accordance with the rules set out in the regulations. The rules governing the procedure where an entity qualifies for both templates simultaneously are set out in the programme regulations (see Chapter 6.1).The agreement on the payment of compensation will be drawn up in accordance with applicable legislation and will not contain any provisions that would discourage beneficiaries from entering into the agreement. A draft of the agreement will be published alongside the call for applications for compensation payments.

7.9 Table of entitlements

The table below (Table 7.2) provides a summary of the rules for awarding compensation to eligible groups, in accordance with the criteria described in the previous chapters. It takes into account lost resources, documentation requirements, the extent of potential losses and the basic principles for calculating the amount of the payment. The table is intended to facilitate the identification of entitlements under the applicable compensation scheme.

Table 7.2 Table of entitlements

Lost resources	Details	Eligible persons	Entitlements
Operators of commercial fishing vessels			
Commercial fishing – direct losses to fishing vessels in the project area	Restricted access to parts of fishing grounds due to the construction of BC-Wind (OFMZ area, the offshore section of the connection infrastructure route)	Operators of vessels carrying out fishing activities in the years 2022–2025 in the fishing squares affected by the Project (O6, O7, O8, P7, P8), holding a valid fishing licence and a special fishing permit, who submit a complete application together with the required documentation	In accordance with Chapter 6 – Form 1
Commercial fishing – longer travel times to fishing grounds	Increased travel time to fishing grounds due to the construction of BC-Wind (OFM area, the offshore section of the connection infrastructure route)	Operators of vessels transiting the Project Area between 2022 and 2025	In accordance with Chapter 6 – Formula 2

Lost resources	Details	Eligible persons	Entitlements
Disruptions and losses incurred by organisers of recreational fishing trips	Restricted access to parts of fishing grounds due to the construction of BC-Wind (OFMZ area, the offshore section of the connection infrastructure route)	Operators of vessels used by organisers of recreational fishing trips operating from the ports of Łeba and Władysławowo	In accordance with Chapter 6.5 – Template 3

8. MONITORING AND EVALUATION

8.1 General objectives of monitoring and evaluation

The main objective of monitoring and evaluation is to verify whether this Livelihood Restoration Plan effectively restores the lost sources of income of those affected by the Project who have suffered economic losses. Regular monitoring will also enable ongoing verification of the Plan's compliance with the agreed timetable (Chapter 8.2). The objectives of monitoring and evaluation also include:

- ensuring a regular assessment of the Plan's implementation activities and their outcomes,
- gathering up-to-date information on whether compensation is being provided in accordance with the agreed compensation scheme (Chapter 6),
- continuously streamlining and improving the Plan by identifying elements requiring adjustment and implementing corrective actions,
- ensuring that complaints and grievances submitted via the enquiries and claims mechanism (Annex 2) are managed effectively and in a timely manner.

8.2 Internal monitoring

Internal monitoring will cover the entire period of implementation of the Revenue Sources Restoration Plan and the progress of activities related to its effective implementation (*Table 8.1*). The findings of the monitoring will be important for the preparation of the assumptions for the plan covering the operational period.

Table8 .1 Summary of activities relating to ongoing internal monitoring

No.	Activity	Method / data source	Indicator	Time frame
1.	Consultations on the compensation scheme with those affected by the Project	Consultation records: attendance lists, meeting minutes, summary of comments received and how they were addressed	Number of meetings and participants; number of comments submitted / taken into account / rejected, with justification	After each round of meetings: September 2026 (<i>Table9 .2</i> , items 5–7)
2.	Call for applications for compensation	Register of applications maintained by the Contractor	Number of applications according to Template No. 1 / 2 / 3 and port; number of late applications; number of requests for additional information	Weekly during the application period; summary after the application period closes (<i>Table9 .2</i> , item 8)
3.	Retrieval of individual data from the CMR	Register of data requests (date of request, date of receipt of data)	Time from submission of the power of attorney to receipt of data; number of requests without a response	Weekly during the verification period (<i>Table9 .2</i> , item 8)
4.	Verification of applications and decisions	Register of applications; Contractor's recommendations; Investor's decisions	Number of applications: pending / rejected / approved; time from receipt to decision	From the time a request for data is made until it is received. (<i>Table9 .2</i> , item 8); summary following the close of applications.

No.	Activity	Method / data source	Indicator	Time frame
5.	Applications for reconsideration of decisions	Register of requests (field 'reconsideration')	Number of requests for reconsideration; outcome (upheld / amended); processing time vs. deadline set out in the regulations	On an ongoing basis; summary upon completion of the review
6.	Payment of compensation	Investor's summary: agreements signed vs. payments made	Number and value of agreements signed; number and value of payments; number of late payments	2–21 December 2026 (<i>Table 9.2</i> , item 9); summary following completion
7.	Complaints regarding the Plan and the compensation programme	Complaints register (Annex 2, point 9)	Number of complaints by category and channel; processing time; missed deadlines; proportion of valid complaints; corrective actions and their implementation status (Annex 2, point 11)	Upon completion and resolution of the call for applications.

In addition to assessing the effectiveness of the compensation programme's implementation, a voluntary survey will be conducted amongst applicants as part of the call for compensation applications; the results of this survey will provide information on the potential social impacts of the revenue restoration programme.

The survey will cover, amongst other things, the following aspects:

- a) Household size – number of household members, number of dependants;
- b) The structure of the household's sources of income (percentage breakdown);
- c) The share of fishing activities in the income structure;
- d) Nature of the business activity;

- Is fishing the main branch of the business?
- Status in relation to the fishing vessel: owner/vessel operator;
- Other types of business activity.

Survey data will be collected, stored and processed in accordance with data protection regulations. For analytical purposes, it will be processed in an anonymised form.

8.3 External monitoring

Implementation of the plan will be monitored by an independent environmental and social consultant to assess whether the process is being carried out correctly, in accordance with the standards of the institutions funding the project.

8.4 Final audit

The final audit of the ‘¹²’ will be carried out by an entity engaged by the Investor to implement the compensation scheme, and its findings will be included in the final report. The audit will be carried out once the payment of compensation has been completed, in accordance with the methodology set out in this Plan.

The aim of the audit will be to verify the accuracy of the assumptions made in drawing up the Plan, with particular emphasis on assessing fishing activity within the MFW and IP areas, as well as to analyse the outcomes of the implementation of key elements of the process – public consultations, the call for applications, the payment of compensation, and the handling of complaints. Should any irregularities, negligence or shortcomings relating to the

¹² IFC Performance Standard 5: a final audit of the plan’s implementation carried out by independent, competent experts.

implementation of this Plan be identified, recommendations will be drawn up for use in the preparation of the plan covering the Project's operational period.

A report summarising the process will be made available to stakeholders on the Project's website and will be provided to the Borrowers.

9. RESPONSIBILITIES RELATING TO IMPLEMENTATION AND FINANCING

9.1 Roles and responsibilities

The individuals responsible for implementing the Livelihood Restoration Plan are listed below (Table 9.1).

Table 9.1 List of persons responsible for implementing the Revenue Restoration Plan

No.	Position	First name and surname	Role
1.	Head of Development	Tomasz Kreft	Co-ordinating the implementation and updating of the Plan
2.	Senior Onshore Development Coordinator	Marcin Włodarski	Implementation of the Plan; oversight of the compensation programme
3.	Communication and Stakeholders Manager	Patrycja Chomko-Wojcikowska	Managing stakeholder relations, coordinating Project communications; responsibility for the mechanism for submitting enquiries and claims (Annex 1, point 10)
5.	Finance Associate Director	Katarzyna Kufel	Responsible for the settlement of compensation
6.	Fisheries Liaison Officer	Konrad Betej	Liaising with the fishing sector; presence in ports; receiving complaints (Annex 1); participating in the verification of applications not related to catch data

9.2 Timetable

The timetable for the implementation of the Livelihood Restoration Plan for all phases of the Project is set out below (Table9 .2). It should be noted that this is provisional for the operational and decommissioning phases and will require verification prior to the commencement of each of these phases.

Table9 .2 Timetable for the implementation of the Revenue Sources Restoration Plan

No.	Implementation stage	Element	Timeframe
1.	Preparatory stage	Updating the existing Income Source Restoration Plan – verification of fisheries data within the MFW and IP areas based on anonymised catch data (catch volume and value; VMS; characteristics of fishing vessels from the ports of Władysławowo and Łeba and the harbours of Dębki and Karwia) – impact on fish stocks (fishing bans, depletion of stocks due to climate change, construction noise) – assessment of the intensity of fishing activity within the MFW and IP areas; movement of fishing vessels – routes to other fishing grounds – assessment of spatial restrictions on fishing activities associated with construction, including the establishment of safety zones and infrastructure elements constituting navigational barriers – impact on other fisheries-related activities, including commercial angling trips	1 July 2026 – 21 August 2026
2.	Preparatory stage	Development of a methodology for calculating compensation – assessment of catch losses in the MFW and IP BC-Wind areas – fishing squares O6, O7, O8, P7, P8 – impact of extended access routes on other fishing grounds and the abandonment of certain areas due to unacceptably long routes – impact on operators of commercial trips for individual anglers – development of a compensation methodology taking into account all relevant factors relating to	by 21 August 2026

No.	Implementation stage	Element	Timeframe
		the organisation of trips and losses resulting from spatial restrictions and the lengthening of routes – an assessment of the expected scale of compensation payments – drawing up a 'contingency plan' in the event that the scope of compensation is extended (other potential stakeholders)	
4.	Preparatory stage	Development of a system for processing applications for compensation payments – eligibility criteria for beneficiaries – development of an application form and a set of required supporting documents confirming fishing activity within the Project area, including: a power of attorney to access individual catch data in the CMR, the ownership structure of the fishing vessel, identification and financial details of the vessel owner(s), and a GDPR declaration – determination of the legal consequences and obligations (including tax obligations) arising from the receipt of compensation, depending on the beneficiary's legal status – drafting of rules and procedures for the compensation process for beneficiaries, including a timetable and an appeals mechanism – drafting a model agreement setting out the obligations of the parties – recommendation of tools for communicating with stakeholders in the fisheries sector regarding compensation payments – co-operating with the Investor to develop an internal procedure for making compensation payments	until 21 August 2026
5.	Public consultations – part 1	Consultation meetings – part 1: presentation of the compensation scheme and discussion of the proposed compensation framework	End of September 2026
6.	Public consultation, part 2	Consultation meetings – part 2: presentation of the final scheme taking into account stakeholders' comments – possible further negotiations (depending on the outcome of the Part 2 meetings)	End of October 2026

No.	Implementation stage	Element	Timeframe
7.	Implementation of the scheme	Launch of the compensation scheme, implementation of procedures – organisation of the call for applications – collection of individual catch reports from the CMR (based on powers of attorney granted by fishermen) – verification of applications in terms of form and substance – decision on whether to accept or reject applications – signing of compensation agreements	depending on the outcome of the second round of consultation meetings; tentatively scheduled for December 2026
8.	Implementation of the scheme	Transfer of compensation to beneficiaries' accounts	subject to the outcome of the second round of consultation meetings; tentatively – first quarter of 2027
10.	All stages of the Project's implementation	Management of complaints and comments regarding the Revenue Sources Restoration Plan	(Annex 2 and Chapter 7)

Implementation of the Plan will also be monitored in accordance with the system described above (*Table 8.1*).

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APPENDIX 1: PROCEDURE FOR SUBMITTING ENQUIRIES AND CLAIMS

1. Basis and purpose

The BC-Wind Project has an existing mechanism for submitting enquiries and claims, as described in Annex A to the Stakeholder Engagement Plan (hereinafter: Annex A)¹³. This annex does not establish a separate mechanism for the compensation programme. The compensation programme utilises the existing mechanism, and this section sets out how it is to be applied in relation to persons affected by the Project and to the compensation programme.

The obligation to maintain the mechanism stems from IFC Performance Standard 1 and the Equator Principles, adopted by the institutions financing the Project. The mechanism enables issues to be resolved at an early stage, before they escalate into a dispute, and builds relationships with the Project's surrounding community based on trust.

A grievance may be a complaint, a concern, a question, a suggestion or any other comment relating to the Project, its implementation or its impact. In this chapter, the terms 'grievance' and 'complaint' are used in accordance with Annex A.

During the construction phase, the mechanism may be managed by the Investor, the contractor or a dedicated entity specialising in public engagement. Regardless of the managing entity, responsibility for the mechanism lies with the Investor.

The mechanism is supplementary to legal remedies. It does not replace them nor does it restrict access to them.

2. Scope

¹³ IFC Performance Standard 1: a requirement to establish a mechanism for receiving and addressing complaints from affected communities, proportionate to the risks of the Project and not precluding administrative or judicial remedies.

A complaint may be lodged by any natural person, business entity, organisation or institution – regardless of whether they are participating in the compensation scheme or meet the eligibility criteria for compensation. Lodging a complaint does not require proof of a legal interest.

With regard to those affected by the Project, complaints relate in particular to:

- the impact of Project-related works on fishing activities – access to water bodies, safety of navigation, fishing conditions;
- damage to property, including fishing gear and vessels;
- the operation of the compensation scheme – the application process, handling of claims, method of calculating amounts, and payments;
- the manner in which consultations are conducted, and the scope and timeliness of the information provided;
- the conduct of the Investor's staff, contractors and subcontractors.

A complaint concerning a matter falling outside the scope of the Project, the Investor or its contractors is registered, and the complainant is informed of its rejection, along with details of the appropriate recipient. No complaint goes unanswered.

3. Rules

In accordance with Annex A:

- a complaint may be lodged at any time and free of charge;
- a complaint is dealt with orally or in writing, in accordance with the preferred form of communication indicated by the complainant;
- the complainant has the right to request that their name be kept confidential; a complaint may be lodged anonymously – the absence of contact details merely limits the ability to provide a response;
- at any time, the complainant has the right to lodge a complaint with the relevant authorities or to take legal action in accordance with the legislation in force in Poland; using this mechanism does not require the complainant to waive any rights and is not a condition for taking such action.

Furthermore, in relation to the compensation scheme: lodging a complaint must not result in the complainant being treated less favourably in any respect, in particular with regard to

eligibility for compensation, the amount of compensation, the order in which applications are processed, or access to information about the Project.

4. Channels

An appeal may be lodged in one of the following ways:

- in person;
- by telephone, on the Project's contact number;
- by post, to the Investor's correspondence address;
- by email, to the Project's dedicated email address;
- using the complaint form available on the Project's website (www.bc-wind.pl) – a template of the form is set out in Appendix 4 to Annex A;
- in writing, to the contact box – the contents of the box are collected by a representative of the Investor at least once every two weeks.

For those affected by the Project, the in-person channel includes consultation meetings, drop-in sessions at ports covered by the Plan, and application collection points during the application period for the compensation scheme. A complaint made verbally is recorded by the person receiving it in the form of a note, which is presented to the complainant for confirmation; refusal to confirm does not suspend registration.

Contact details (telephone number, addresses, location of contact boxes) are published on the Project's website and in the information materials referred to in point 10.

5. Procedure

The procedure follows the process set out in Annex A (process flowcharts – Annexes 1–3 to Annex A), comprising the following steps:

- **Confirmation of receipt.** The complainant receives formal confirmation that the complaint has been lodged. In the case of a telephone complaint, the person receiving the call conducts an interview and completes the details during the conversation. In the case of a written complaint without contact details, a complaint of a substantive nature is registered and considered without the possibility of providing a reply.
- **Registration.** The complaint is entered into the Complaints Register and is assigned a reference number, which is provided to the complainant.
- **Assessment.** The complaint is assessed to determine whether it relates to the Project, the Investor or its contractors. If not, it is rejected; the rejection is recorded and

communicated to the complainant. If so, a person responsible for resolving the matter is appointed. If further clarification is required, the person responsible contacts the complainant.

- **Resolution.** If immediate action is possible, the complainant is informed and corrective measures are implemented. In other cases, dialogue or mediation is used. In the case of significant complaints, the matter is investigated in depth, with the complainant's involvement where necessary.
- **Response.** The complainant receives a formal response setting out the findings, the actions taken or planned, and information on the possibility of further action (point 8). If the complaint is rejected in whole or in part, or cannot be resolved, this information is communicated to the complainant in their preferred form.
- **Closure.** The case is assessed and closed; the steps taken to resolve it and the outcome are recorded in the Complaints Register and in the section of the form completed by the receiving party.

6. Time limits

Action	Deadline
Confirmation of receipt of the complaint	1 working day from receipt (by telephone – during the call)
Entry in the Complaints Register	1 working day from receipt
Collection of complaints from the contact box	at least once every 2 weeks
Formal response	20 working days from registration
Formal response – serious non-compliance	30 working days from registration, with the complainant notified of the extension
Matters concerning the safety of persons or vessels	immediately, with simultaneous notification to the relevant services

Any failure to meet the deadline is recorded in the Complaints Register, together with the reason.

7. Appeals and requests for reconsideration under the compensation scheme

The compensation scheme does not have its own separate complaints mechanism – it utilises the mechanism for submitting enquiries and claims. The scheme's terms and conditions refer to this chapter. However, there are two distinct procedures:

- **Complaint** – this concerns the way the scheme is run (recruitment, processing of applications, communication, conduct of persons acting on behalf of the Investor) and is available to everyone. It is dealt with in accordance with the procedure described in this chapter. It does not alter the individual decision on the application, but may lead to a change in the rules, an adjustment to the way they are applied, or a corrective measure of a broader scope.
- **A request for reconsideration** relates to a specific decision issued in respect of a specific applicant (rejection, refusal to consider the application, amount of compensation). It is considered in accordance with the procedure set out in the programme's rules and is available only to the party to the decision. It leads to the decision in the individual case being amended or upheld.

Objections to the method of calculating the amount of compensation must be raised before the agreement is signed, in accordance with the procedure set out in the programme's rules; after the agreement has been signed – through the complaints procedure.

The use of one procedure does not preclude the other. The lodging of a complaint does not suspend or extend the time limits relating to the application for compensation.

8. Dissatisfaction with the response

If the applicant is not satisfied with the initial response, the reviewing body shall cooperate with them to find a mutually agreed solution (Annex A). In cases concerning persons affected by the Project, the matter is handled at this stage by a person other than the author of the initial response, with the involvement of the Fisheries Liaison Officer. The course and outcome of the proceedings are recorded in the Complaints Register.

Failure to reach an agreed solution does not preclude the complainant from taking legal action (point 3).

9. Complaints Register

The reviewing body shall maintain a Complaints Register in accordance with the template set out in Annex 5 to Annex A. The Register is used to track the resolution of all complaints and to prepare management reports and reports for the Lenders.

For the purposes of the compensation scheme, the template is supplemented with the following fields:

- reference number (matching the number assigned on the form);
- channel of submission (in person / telephone / post / email / form / suggestion box);
- associated compensation claim number, if applicable;
- status (open / closed) and a note regarding any missed deadline and the reason for it.

The complaints register is kept separately from the register of compensation claims. Entries relating to the same person or case are cross-referenced.

10. Responsibility and communication

The Investor is responsible for the operation of the mechanism – the position of Communication and Stakeholders Manager (*Table 9.1*). Their duties include overseeing the Complaints Register and ensuring compliance with deadlines, allocating cases, approving responses and providing periodic reports.

With regard to the fisheries sector, the tasks relating to receiving complaints, liaising with complainants and maintaining a presence in ports are carried out by the Fisheries Liaison Officer.

The contractor administering the compensation scheme receives complaints relating to the processing of applications and forwards them for registration no later than the next working day. The contractor does not independently consider complaints concerning its own actions.

Information about the mechanism – what a complaint may relate to, who can lodge a complaint and how, within what timeframe a response will be received, the option to lodge an anonymous complaint and the principle of non-retaliation – is provided in plain language, in Polish: on the Project's website, in materials distributed at ports, during consultation meetings and at application submission points, and through fisheries organisations.

11. Monitoring and reporting

The complaints register is used to prepare management reports. The functioning of the mechanism in relation to the Plan is subject to a quarterly review (Table 8.1). The report covers: the number of complaints by category and channel, the time taken to process them and instances where deadlines were exceeded, the proportion of complaints deemed valid, corrective actions taken along with their implementation status, the number of cases handled under point 8, and recurring complaints. Recurring complaints may form the basis for changes to the way the compensation scheme is run.

12. Documents

The mechanism utilises the documents specified in Annex A: process flowcharts (Annexes 1–3), the complaint form together with the GDPR information notice (Annex 4) and the Complaints Register template (Annex 5). This Plan does not reproduce these documents.

ANNEX 2: COORDINATES OF THE OWF SAFETY ZONE

The coordinates below form an annex to the Investor's application for the establishment of a safety zone around the BC-Wind offshore wind farm, submitted on 29 July 2026 to the Director of the Maritime Office in Gdynia pursuant to Article 24 of the Act of 21 March 1991 on the maritime areas of the Republic of Poland and maritime administration.

As at 27 August 2026, no order had been issued; the zone has the status of 'proposed'. The outline of the zone coincides with the OWF development area (the B-Wind and C-Wind areas), with no additional buffer zone beyond its boundaries.

The coordinates are given in degrees–minutes–seconds, in the form provided by the Investor, without any conversions. Reference system: WGS 84 (to be confirmed by the Investor).

Once the order has been issued, the annex will be updated to include the date and number of the order, the conditions for movement within the zone and any changes to the boundary.

Table Z3.1 Coordinates of the boundary of the proposed BC-Wind OWF safety zone

Area	Point ID	Longitude (E)	Latitude (N)
B-Wind	B_1	18° 03' 17.54036" E	55° 06' 24.39496" N
B-Wind	B_2	18° 03' 29.95120" E	55° 06' 19.25526" N
B-Wind	B_3	18° 04' 06.49727" E	55° 05' 58.79118" N
B-Wind	B_4	18° 05' 00.24074" E	55° 05' 31.88721" N
B-Wind	B_5	18° 05' 37.71270" E	55° 05' 04.10440" N
B-Wind	B_6	18° 06' 23.61878" E	55° 04' 38.36006" N
B-Wind	B_7	18° 07' 03.29189" E	55° 04' 21.46395" N
B-Wind	B_8	18° 08' 30.93288" E	55° 03' 54.30525" N
B-Wind	B_9	18° 08' 44.91926" E	55° 03' 50.59211" N
B-Wind	B_10	18° 08' 45.12916" E	55° 03' 50.21270" N
B-Wind	B_11	18° 08' 49.32935" E	55° 03' 00.431470" N
B-Wind	B_12	18° 08' 50.79631" E	55° 02' 43.04406" N
B-Wind	B_13	18° 08' 50.37194" E	55° 02' 40.93421" N
B-Wind	B_14	18° 03' 55.62787" E	55° 02' 15.17440" N
B-Wind	B_15	18° 01' 53.40538" E	55° 02' 10.61884" N
B-Wind	B_16	18° 01' 53.28243" E	55° 06' 20.78482" N
C-Wind	C_1	17° 50' 29.50692" E	55° 05' 41.93060" N
C-Wind	C_2	17° 51' 12.92083" E	55° 05' 45.97360" N
C-Wind	C_3	17° 54' 07.58456" E	55° 06' 01.65557" N
C-Wind	C_4	17° 56' 01.35240" E	55° 06' 11.34555" N
C-Wind	C_5	17° 58' 58.04276" E	55° 06' 15.59407" N
C-Wind	C_6	18° 01' 03.57448" E	55° 06' 18.65590" N
C-Wind	C_7	18° 01' 52.92250" E	55° 06' 20.76941" N
C-Wind	C_8	18° 01' 53.04538" E	55° 02' 10.61866" N
C-Wind	C_9	18° 00' 28.53063" E	55° 02' 07.157432" N
C-Wind	C_10	18° 00' 28.54846" E	55° 03' 38.54790" N

C-Wind	C_11	18° 00' 28.55623" E	55° 04' 18.34230" N
C-Wind	C_12	18° 00' 27.31757" E	55° 04' 23.08683" N
C-Wind	C_13	18° 00' 23.70852" E	55° 04' 27.41433" N
C-Wind	C_14	18° 00' 18.04625" E	55° 04' 30.94429" N
C-Wind	C_15	18° 00' 10.82857" E	55° 04' 33.36627" N
C-Wind	C_16	18° 00' 02.690203" E	55° 04' 34.46726" N
C-Wind	C_17	17° 56' 31.24950" E	55° 04' 44.47560" N
C-Wind	C_18	17° 51' 32.59151" E	55° 04' 58.61275" N
C-Wind	C_19	17° 50' 00.781226" E	55° 05' 02.980592" N

Fig. Z3.1. Boundaries of the proposed safety zone superimposed on the BC-Wind offshore wind farm development area and fishing squares

