**Responsible Renewable Energy: 10 Questions on Human Rights**

**Name of company**: \_VATTENFALL AB\_\_\_\_\_\_\_\_\_\_\_\_

**Projects registered under UN Clean Development Mechanism (if any):** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Vattenfall is involved in approximately 40 CDM projects. Vattenfall does not disclose the individual projects in our current portfolio because this is commercially sensitive information. The UNFCCC, provides the details on the projects in which Vattenfall has been involved with historically.

**Human rights policy commitment**[*Examples & guidance*](http://business-humanrights.org/en/un-guiding-principles/implementation-tools-examples/implementation-by-companies/type-of-step-taken/human-rights-policy-statements)

1. Does your company have a publicly available commitment to respect human rights? If so, please provide a link.

Yes. Code of Conduct <http://corporate.vattenfall.com/globalassets/corporate/sustainability/doc/code_of_contact_2014_nolinks.pdf>

Yes. Code of Conduct for Suppliers <http://corporate.vattenfall.com/globalassets/corporate/about_vattenfall/suppliers/code_of_conduct-for_suppliers.pdf>

**Human rights due diligence**[*Examples & guidance*](http://business-humanrights.org/en/un-guiding-principles/implementation-tools-examples/implementation-by-companies/type-of-step-taken/due-diligence-general)

1. Does your company identify its salient human rights issues and does it have a due diligence process to manage them? If so, please list the issues and describe the due diligence process (key steps include: impact assessment, integrating & acting on findings, tracking responses & communicating how impacts are addressed).

Human rights work at Vattenfall, in accordance with the UN Guiding Principles has so far mainly focussed on the supply chain and parts of a due diligence process are in place.

<http://corporate.vattenfall.com/sustainability/policies-and-management/supply-chain-policy/>

Vattenfall is currently in the initial stages of developing its work in human rights to align it more with the UN Guiding Principles. This work will include conducting human rights impact assessments and identifying and addressing gaps in human rights due diligence and grievance mechanisms.

**Community engagement & consultation**[*Examples & guidance*](http://business-humanrights.org/en/guidance-community-engagement-0)

1. What criteria does your company use to identify communities that may be affected by renewable energy projects it is involved in?

The example here is taken from Vattenfall’s wind power development in Sweden. Vattenfall uses a wide scope including affected municipalities, Sápmi villages, local NGOs and people living close to the project. People living within 3 km from a planned area are always informed by mail and invited to at least two open, public meetings before a permit application is made. The public is always invited to consultations including the meetings via advertisements in local newspapers.

For hydropower no new hydro plants are being constructed, but Vattenfall consults with both local communities and Sápmi villages prior to undertaking any activities that may affect them.

1. How does your company consult with affected communities (on impact assessments, resettlement, benefit sharing plans, etc.)? Please describe what form consultations take and when they are carried out in a project’s cycle.

The example here is taken from Vattenfall’s wind power development in Sweden: Informal contacts with at least the municipality, Sápmi villages and birdlife organisations are always taken before it is decided to start a project. People living within at least 3 km from the project are informed by letter before the project is made public. The letter includes contact information with the project and an invitation to an information meeting. Formal consultation meetings in the Environmental Impact Assessment (EIA) process are held with the County Administrative Board, the municipality, Sápmi villages and local NGOs including bird life organisations and hunters organisations. At least one public meeting is held as part of the EIA consultations. Vattenfall has a policy to contribute to local communities, preferably through local NGOs and to inform local business in order to prepare them for upcoming procurement. In some cases buildings are bought but only if Vattenfall can reach an understanding with the owner.

For hydropower, the same process is applied.

1. Does your company ensure its consultations include the perspectives and respect the rights of all affected community members (including those who may be marginalised for reasons of race, ethnic origin, gender, social status, age, religion, wealth or income or other considerations)? How is this ensured?

Vattenfall tries to ensure this by inviting everyone to give their opinion in the consultation process by advertising consultations in the local press and holding public meetings.

**Free, prior and informed consent**[*Examples & guidance*](http://business-humanrights.org/en/business-action-0/issue-guidance/indigenous-peoples)

1. Under what circumstances does your company commit to seeking an affected community’s free, prior & informed consent to a project? Please provide examples of projects where free, prior & informed consent was sought (if applicable).

The example here is taken from Vattenfall’s wind power development in Sweden: According to legislation, consent from the municipality is necessary in order to get a permit for wind turbines. Vattenfall consults with the affected communities, prior to starting a project. We have a separate process for Sápmi villages (see ‘Community Engagement’ above) that ensures that they are informed very early in a project and that their preliminary opinion is part of the back ground material when it is decided to start a project.

1. What is your company’s process for obtaining and evaluating free, prior & informed consent?

The example here is taken from Vattenfall’s wind power development in Sweden: See above. All statements that are given in the consultation process are commented on in the Environmental Impact Assessment (EIA).

1. Has your company faced any challenges in its process to seek free, prior & informed consent for renewable energy projects? If so, please describe what steps your company has taken to overcome these challenges.

The example here is taken from Vattenfall’s wind power development in Sweden: There is always opposition by individuals to wind power projects. In some cases an anti-wind power NGO is formed locally. Sápmi villages are often against the projects. There is an ongoing communication with them.

**Security**[*Examples & guidance*](http://business-humanrights.org/en/security-issues-conflict-zones-0)

1. What steps does your company take to ensure that its own personnel, private security companies it contracts with, and/or government forces providing security to its projects, respect the rights of workers and community members, including those who may oppose its projects?

Vattenfall mainly operates in western European countries (Sweden and the rest of the Nordic region, Germany, the Netherlands and the UK). These countries have all ratified the International Labour Organization’s (ILO) eight fundamental conventions. A country that has ratified an ILO convention must regularly report on its performance to the ILO.

Vattenfall mainly purchases security services from major companies who have agreed to comply with Vattenfall’s Code of Conduct for Suppliers, which includes requirements on working conditions (in accordance with the core ILO conventions) and respect for human rights.

**Remedy**[*Examples & guidance*](http://business-humanrights.org/en/un-guiding-principles/implementation-tools-examples/access-to-remedies-grievance-mechanisms/non-judicial-grievance-mechanisms/company-based)

1. Does your company have a grievance mechanism in place at each project site for affected communities and workers to raise concerns about local impacts, including human rights abuses? If so, were affected communities involved in the design of the grievance mechanism, including its set-up and the types of remedies it provides?

Vattenfall has different mechanisms in place for consultation with affected stakeholders prior to, during and after projects. Some of these are required by law (for example, consultation with communities and stakeholders affected by projects in Sweden is required under the Swedish Environmental Code and is a prerequisite for certain plant or facility licensing). In its wind power operations in Sweden, there is always a web page for each project and for most sites with contact information. The project or site manager has direct contact and special arrangements with some stakeholders including people living close to the sight and Sápmi villages.

For hydropower, where there is little continued expansion, Vattenfall focuses on community relations, including the Sápmi villages affected by hydropower. Vattenfall has systematic and regular, recurring meetings with the Sápmi villages where they can raise complaints.

For affected local communities, Vattenfall has meetings when deemed necessary.

Vattenfall also has a corporate whistleblowing system as well as other types of consultation and dialogue processes in place, locally at sites.

However, none of Vattenfall’s grievance mechanisms have yet been tested against the effectiveness criteria defined in the UN Guiding Principles, see description of ongoing improvement work under ‘Human Rights Due Diligence’ above.

**Other information**Please provide any further information regarding your company’s policies and practices on human rights that you think is relevant.