

# Nord Stream 2

## Stakeholder Engagement Plan - Sweden



<https://www.sweden.org.za/images/swedens-flag.jpg>

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## Abbreviations and Definitions

<b>Affected communities</b>	Local communities directly affected by the Project
<b>CAB</b>	County Administrative Board
<b>Contractor</b>	Any legal entity or physical person providing services to the Company
<b>Cumulative effect</b>	Combined impact of several sources spread in space or combined impact of one source spread in time.
<b>DP</b>	Dynamically Positioned
<b>EEZ</b>	Exclusive Economic Zone
<b>Ecosystem services</b>	The benefits obtained by humans from functioning of natural systems
<b>EIA</b>	Environmental Impact Assessment
<b>ES</b>	Environmental Study
<b>Espoo Convention</b>	Convention on Environmental Impact Assessment in a Transboundary Context, 1991
<b>Espoo Report</b>	Report on environmental impact assessment in a transboundary context
<b>GoU</b>	Gotland University
<b>IFC</b>	International Finance Corporation
<b>KaK</b>	Kammarkollegiet
<b>NGO</b>	Non-governmental organizations
<b>NSP</b>	Nord Stream AG
<b>NSP2</b>	Nord Stream 2 project
<b>Project</b>	Nord Stream 2 pipeline construction project
<b>PS</b>	Performance Standards
<b>PID</b>	Project Information Document
<b>ROW</b>	Right-of-way
<b>SBA</b>	Swedish Board of Agriculture
<b>SEP</b>	Stakeholder Engagement Plan
<b>SGU</b>	Geological Survey of Sweden
<b>SMA</b>	Swedish Maritime Administration
<b>STA</b>	Swedish Transport Agency
<b>Stakeholders</b>	Any individual or group who is affected by the project implementation or may have a relevant interest in, or influence over, it
<b>SwAM</b>	Swedish Agency for Marine and Water Management
<b>TrV</b>	Swedish Transport Administration
<b>TW</b>	Territorial Waters
<b>UXO</b>	Unexploded Ordnance

## Executive Summary

### Background to the Nord Stream 2 Project

The Nord Stream 2 Project (the “Project”) comprises the planning, construction and operation of a new strategic twin subsea pipeline (the “Pipeline”) that will connect European consumers with Russian gas fields. The Project will have the capacity to supply 55 billion m<sup>3</sup> (bcm) of natural gas per year. The Pipeline has a planned length of approximately 1,230 km from Russia to Germany via the Exclusive Economic Zone (EEZ) and/or Territorial Waters of Russia, Finland, Sweden, Denmark and Germany (the “Project Countries”) in the Baltic Sea. The design, construction and subsequent operation of the pipeline are managed by Nord Stream 2 AG (the “Company”), which has been specifically established for this purpose.

Nord Stream 2 AG recognizes the importance of stakeholder engagement in building strong, constructive, and responsive relationships that are essential for the successful management of the Project's environmental and social impacts. The objective of the Company's stakeholder engagement process is to disclose information about the Project while also giving stakeholders the opportunity to provide their opinions and identify any concerns. The opinions/concerns submitted during the consultation process have been taken into account in the preparation and review of the Project's environmental and social management plans, and during the development of the design of the Project.

### Nord Stream 2's Approach to Stakeholder Engagement

The Company is implementing a stakeholder engagement process across the entire Nord Stream 2 Project, managed through a suite of country-specific SEPs applicable to each Project Country. The SEPs have been developed in a consistent manner in line with the requirements of the International Finance Corporation (IFC) Performance Standards (PS), while at the same time ensuring that country-specific regulatory requirements are met. The stakeholder engagement process commenced at the early stages of the Project development and will continue in an evolving manner throughout the entire Project lifecycle. To reflect this evolving process, the SEPs are “living” documents that will be updated as necessary throughout the Project's lifecycle. The current version of the SEP was updated at the beginning of 2019 to include the start of the ongoing construction phase in Sweden.

While the IFC PS requirements for environmental and social assessment and management are broadly aligned with the national EIA requirements in the five Project Countries, some differences exist requiring the development of additional assessments and plans (for example, in relation to cumulative impacts, ecosystem services and social impacts) in order for the Project to demonstrate compliance with the IFC PS.

Further updates of the SEPs will also be required as the Project evolves through construction, operation and decommissioning.

Personnel of the Project and contracting organizations are not considered within this plan. These managed through the environmental and social management plan for the Project, as well as other procedural documents.

## Stakeholder Engagement in Sweden

This SEP applies to the Project components located within the jurisdiction of Sweden and covers the planning, construction and operation of the Project activities and specifically:

- The planning, construction, operation and decommissioning of all Project related activities, as defined in Section 1.2
- All activities at third-party facilities (i.e. *ancillary facilities*) that are under the control of the Project as described in Section 1.3

Decommissioning activities will take place at the end of the operation of the pipeline system and it is currently not possible to anticipate what methods may have to be employed. Therefore, it cannot be anticipated what risks could be associated with these activities at the moment and what engagement activities consequently may be required. An environmental assessment of the decommissioning activities, and an update of the engagement plan, if warranted, will be prepared ahead of the planned end of the pipeline operation, in accordance with the prevailing legal requirements at that time.

The structure of this Sweden SEP is as follows:

- Section 1 contains a brief description of the Project within the Swedish jurisdiction and its operations including design elements and potential environmental and social issues.
- Section 2 contains a summary of the applicable major national and international legal requirements.
- Section 3 describes summary of key socio-economic and environmental aspects.
- Section 4 presents an overview of the identification of stakeholders.
- Section 5 presents a brief account of stakeholder engagement activities carried out to date.
- Section 6 contains an account of planned stakeholder engagement activities.
- Section 7 presents information on stakeholder engagement data management.
- Section 8 contains information on how the Company will manage the implementation of SEP and stakeholder engagement in terms of personnel/resources.
- Section 9 presents information on monitoring and reporting.

## 1 Brief Description of the Project

### 1.1 Project Overview

The Project comprises the construction of a twin subsea pipeline for the export of 55 bcm of natural gas per year from Russia via the Baltic Sea to a landfall at Lubmin in the German state of Mecklenburg-West Pomerania. The Project will be based on the successful practice of construction and operation of the existing Nord Stream Project (NSP). The overall route of the Nord Stream 2 Pipeline is shown in Figure 1 below.



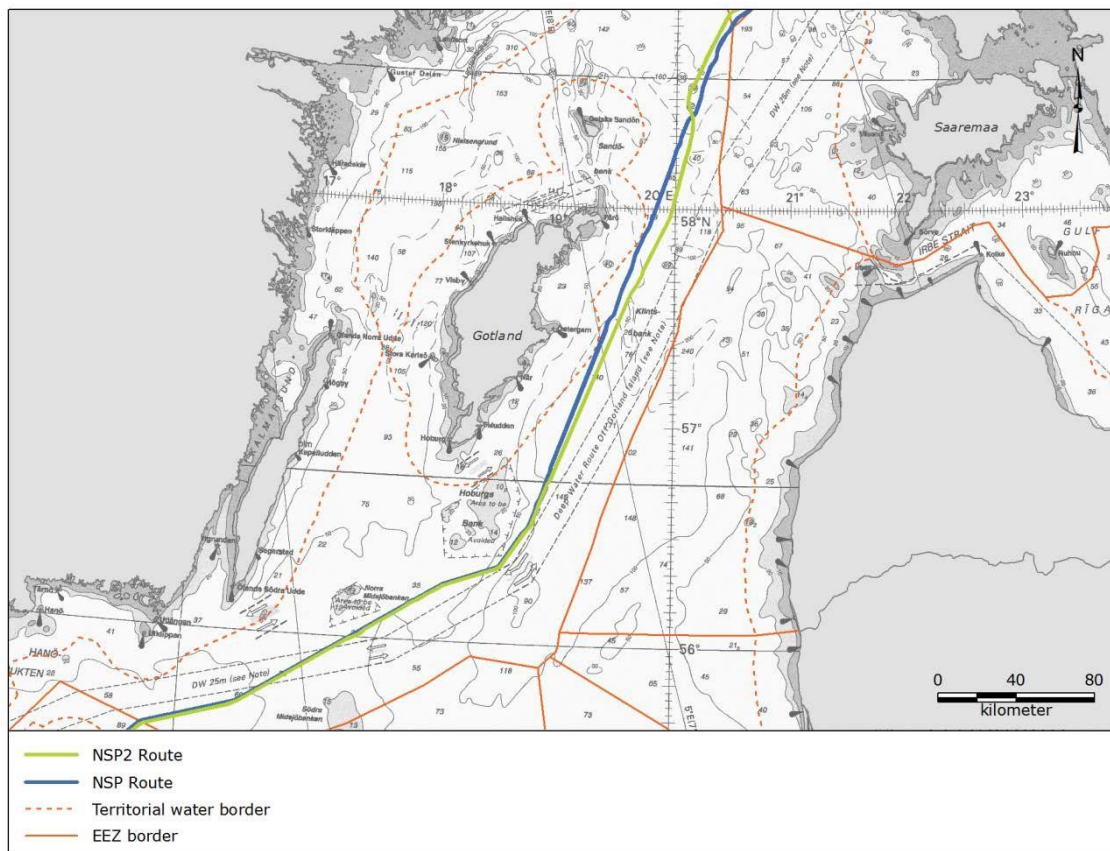
**Figure 1 Overview of the Nord Stream 2 Pipeline Route**

The components of the Nord Stream 2 Project within Swedish jurisdiction are described in Section 1.2 below and comprises NSP2's's base case route in Denmark (the route that stretches south-east of Bornholm).

### 1.2 The Nord Stream 2 Project in Sweden

The length of the Project pipeline route within the Swedish EEZ is approximately 510 km and runs northwest of the existing Nord Stream (NSP) pipeline in the northernmost part of the Swedish sector (see Figure 2). Approximately 50 km after having entered the Swedish EEZ, Nord Stream 2 (NSP2) cross the existing Nord Stream pipeline (NSP) and then run broadly parallel to it, while remaining to its southeast.





**Figure 2 Indicative Nord Stream 2 route within the Swedish EEZ**

The Project pipeline is currently being laid in the Swedish EEZ. The route stretches approximately 40 km from the eastern coastline of Gotland and 80 km from the coastal areas of the counties of Skåne and Blekinge. The closest point to Gotland will be around 30 km and the closest point to the mainland (in Blekinge) 55 km.

The offshore pipelines are currently being installed by multiple vessels working simultaneously along the Baltic Sea. Dynamically Positioned (DP) lay vessels are employed. The pipe lay follows a conventional process where the individual (or multiple) pipe joints are welded into a continuous pipe string on board the lay vessel and then lowered to the seabed.

In addition to pipe lay vessels, other construction activities in the Swedish EEZ include (all of which require the set-up of temporary safety exclusion zones around the respective vessels):

- Rock placement for free span corrections and stability measures
- Cable and pipeline crossings
- Seabed ploughing to bury the pipeline in some sections for stability reasons
- Survey activities.

In addition, there is a potential that unexploded munitions may be present along the offshore pipeline route that may need to be destroyed by detonation. That is, however, currently not



foreseen within the Swedish EEZ, since any munitions finds are expected to be managed via local re-routing.

An interim marshalling / storage area for pipes has been set up at the existing port of Karlshamn on the Swedish mainland. Pipes are temporarily being stored at Karlshamn's port, by Karlshamn Hamn AB, prior to onward transport to the lay vessels.



**Figure 3. Location of Karlshamn's port**

The Company will be the owner and operator of the offshore pipeline system. The Nord Stream 2 pipeline system will be monitored and controlled remotely, from the main control centre in the Zug region, Switzerland or, if the latter is unavailable, from a backup control centre in the Zug area.

Planned maintenance and scheduled inspections will be carried out in accordance with statutory requirements and good international industry practice. Any large-scale maintenance activities will be performed during a yearly shutdown in non-winter months.

### **1.3 Ancillary Components and Activities**

The Nord Stream 2 Project stakeholder engagement process also addresses project activities at, and/or use of, third-party facilities where such activities are under the control of the Project.

Within the Swedish section of the Project such activities/facilities relate to use of existing facilities at Karlshamn's port during the construction phase as described above. The facilities at Karlshamn's port are not owned by Nord Stream 2 AG, but Project-related activities at these facilities are under the control of the Company.

## 1.4 Project Schedule

The Project is implemented in accordance with the following preliminary schedule:

- engineering survey and design – until end of 2017
- EIA / Construction permit acquisitions - 2018
- construction – 2018 - 2019
- commissioning - end of 2019
- operation – as of 2020
- decommissioning – at the end of the pipelines operational life

## 2 Applicable Stakeholder Engagement Requirements

The stakeholder engagement activities provided for in this SEP are being conducted in accordance with:

- National regulatory requirements (RF);
- Requirements of the international conventions;
- Standards and guidelines of the International Finance Corporation (IFC).

### 2.1 Swedish Regulatory Requirements for Community Engagement

In order to lay pipelines on the continental shelf outside of Swedish national territory, a permit is required according to the Swedish Continental Shelf Act (SFS 1966:314). The act implements parts of the United Nations Convention on the Law of the Sea (UNCLOS), and specifically the right for all to lay cables and pipelines on the continental shelves outside coastal states territories.

A permit is applied for at the Ministry of Enterprise and Innovation. An application requires an alignment of the pipeline on the continental shelf, and information about the measures that are needed in order to hinder, limit and control pollution from a pipeline (see 4 § Ordinance of the Continental Shelf, SFS 1966:315).

The national Swedish EIA procedure and documentation needed are described in chapter 6 of the Environmental code (1998:808) /2/ and in the Ordinance on EIA (1998:905) /3/. The requirements align to the European Council Directive 85/337/EEC, as amended by Directives 97/11/EC and 2003/35/EC. The project developer has the responsibility to consult with government agencies, municipalities, organizations and citizens that are likely to be interested/affected.

As per the Continental Shelf Act, permit applications should be submitted to the Swedish government, Ministry of Enterprise and Innovation, which takes the final permit decision.

**EIA Procedure in Sweden.** There is no requirement to establish an EIA under the Swedish Continental Shelf Act. Nonetheless, Nord Stream 2 will adhere to the requirements in the EIA directive and the Espoo Convention. The project has therefore already carried out both national and international consultations, and established the equivalent of an EIA, named the

Environmental Study. The Environmental Study carried out in Sweden (i.e. the equivalent of an EIA) describes the main characteristics and technical solutions of the project with a comprehensive assessment of potential impacts. The Environmental Study also includes assessments of transboundary impacts from the project in Sweden. It also includes measures to prevent and mitigate adverse environmental impacts.

## 2.2 Requirements of International Conventions

The gas pipeline route crosses the exclusive economic zones of four countries: Finland, Sweden, Denmark and Germany, as well as the territorial waters of Russia, Germany and Denmark (base case route).

**Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention).** The Espoo Convention promotes international cooperation and participation of the public when the environmental impact of a planned activity is expected to cross a border. It sets out the rights and duties of countries in assessing the likely environmental impact of a proposed activity. The Espoo procedure for the Project broadly ran in parallel to the national EIA procedures.

The Nord Stream 2 project was scheduled so that national Environmental Impact Assessments / Studies could be sent out for public consultation at the same time as the international public consultation under the Espoo Convention.

**Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention).** The Convention regulates access to, time periods and form of distribution of information, as well as participation of the public in decision-making processes.

## 2.3 Performance Standards of International Financial Institutions

**The IFC Performance Standards** (revised in 2012) are internationally recognized standards on social and environmental sustainability, applied by the IFC (the private sector arm of the World Bank Group) and by a number of large commercial banks and Export Credit Agencies within the framework of the Equator Principles. Of particular relevance to the stakeholder engagement process is Performance Standard 1: "Assessment and Management of Environmental and Social Risks and Impacts".

The key requirements of PS 1 pertaining to public engagement are the following:

- Identify and evaluate environmental and social risks and impacts of the project;
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize; and where residual impacts remain, compensate/offset risks and impacts to workers, affected communities and environment;
- Promote improved environmental and social performance through effective use of management systems;

- Ensure grievances from affected individuals, groups, and communities and external communication from other stakeholders are responded to and appropriately managed; and
- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and ensure relevant environmental and social information is disclosed and disseminated.

**Equator Principles III** requirements applicable to public engagement are essentially contained in Principles 5 (Stakeholder Engagement), 6 (Grievance Management) and 10 (Reporting and Transparency), and in IFC Performance Standards 1 and 7 (2012), to which the EPIII make an explicit reference. Public involvement is to be considered an essential part of any business venture and a way to improve project quality and delivery. Equator Principles requirements concerning public consultation are similar to IFC requirements.

## **2.4 Internal Policies and Standards**

In accordance with the system of environmental and social management of Nord Stream 2, procedures and policies have been developed and implemented, which, among others, reflect the Stakeholder Engagement management process.

## **3 Summary of Key Socio-Economic and Environmental Aspects**

The engagement plan is based on the environmental and social aspects associated with the project and the potential risks to the environment and communities.

The potential socio-economic and environmental issues associated with the proposed Project in the Swedish jurisdiction have been identified as follows (these have been identified through the assessments undertaken to date, including documents being prepared as part of the Swedish permitting process for the Project).

### **3.1 Community Health, Safety and Security**

The nearest settlement to the onshore facilities used by the Project in Sweden is the town Karlshamn, which has around 31,000 inhabitants. All activities at the planned marshalling yard at the port of Karlshamn, Karlshamn Hamn, are located within the existing premises of the port and therefore will no significant impact on the local population, commercial activities, or landowners. The only potential exception to this may be related to reactional activities such as diving and sailing in the nearby waters, and noise from the various vessels used to supply the pipes on the few summerhouses located in the vicinity of the port of Karlshamn. In January 2019, around 35,000 pipes were stored at the Karlshamn's port prior to being shipped to the lay barges. These pipes are gradually being shipped to the two pipelay vessels operating in Swedish EEZ since December 2018 and February 2019, respectively.

The lay barges are unlikely to affect marine area users from local communities, incl. leisure mariners (sailing and yachting), divers etc. operating out of ports in Sweden, including the port of Karlshamn, given the pipe lay mainly is carried out during the colder seasons. Marine users are nevertheless being informed of the location and duration of the exclusion zones.

### **3.2 Biodiversity**

The pipeline route in the Swedish EEZ crosses a Natura 2000 site that encompass two previously existing Natura 2000 sites (which were not directly crossed by the pipeline), namely the Hoburgs Bank and Norra Midsjöbanken. Of particular relevance to the Nord Stream 2 project, the proposed Natura 2000 site is important for harbour porpoise, which may be affected by potential underwater noise generated during construction activities (see below).

Underwater construction activities may result in release of sediment during seabed intervention works (e.g. ploughing) and the generation of noise (e.g. from construction vessels, rock placement and munitions clearance). Sediment release results in elevated suspended sediment levels in the water column and smothering effects as the sediment settles, both of which can affect marine fauna and flora. Underwater noise may affect marine fauna and marine mammals in particular. The detailed assessments, however, show that no significant impact will occur.

### **3.3 Marine Infrastructure and Military Activities**

Ship traffic from the North Sea enters the Baltic Sea either via the Kadet Channel, located between Denmark and Germany, or through the strait between Denmark and Sweden. Two major shipping routes run between the Bornholmsgat and the Gulf of Finland east of Gotland: a deep-water route that goes between Södra and Norra Midsjöbanken and a route further to the west that goes west of Norra Midsjöbanken and Hoburgs bank. Close cooperation with the shipping authorities will minimise the potential risks during the construction of the pipeline.

There is a military practice area east of Gotland within Swedish territorial waters. The proposed pipeline route runs close to, but does not cross, this area.

There are four active telecom cables and three active power cables in the Swedish EEZ and appropriate management and consultation with these third party operators has been carried out to avoid impacts. At present, there are no wind farms in the area of the proposed pipeline route in the Swedish EEZ, although there are plans to install a wind farm at Södra Midsjöbanken. The Project pipeline is also located in close proximity to, and crosses, the operational NSP pipeline.

### **3.4 Ecosystem Services**

The most important areas for Swedish bottom trawlers in the Baltic Sea are located west, north and east of Bornholm, partly in Danish territorial waters (in accordance with a bilateral agreement between Denmark and Sweden). Areas southeast of Norra Midsjöbanken and northeast of Gotland are important for Swedish pelagic trawl fishery. East and southeast of Gotland there are areas of national fishery interest (catch areas). The areas are quite large, but the main trawl fishery takes place in more limited locations within the areas of national interest. In order to protect spawning cods, a central part of the main spawning area in the Bornholm Deep and an area south of Hoburgs Bank has been closed to all fisheries during the main spawning season (1 May to 31 October) since the mid-1990s. There is the potential for cumulative impacts from the presence of the Nord Stream 2 pipeline and the NSP pipeline on bottom trawl fishing. During pipeline



construction and maintenance activities temporary safety exclusion zones have or will be set-up around the Project vessels that may temporarily interrupt fishing activities in local areas.

Nord Stream 2 intends to mitigate potential adverse environmental and social impacts originating from the construction and operation of pipelines, including impacts related to fisheries. A dedicated Fisheries Livelihood Plan was developed and is implemented by NSP2 in accordance with the good practice of International Finance Corporation.

### **3.5 Cultural Heritage**

Geophysical surveys of the pipeline corridor have identified 23 shipwrecks within 2 km of the offshore pipeline corridor in the Swedish EEZ. In addition to these clearly identified wrecks, the geophysical surveys have also identified numerous potential wreck fragments/parts. Mitigation procedures for such objects are made in consultation with the national authorities and include minor route changes to avoid the objects and implementation of exclusion zones to protect the objects. A chance finds procedure will also be used to manage the identification and preservation of cultural heritage chance finds.

### **3.6 Munitions Clearance (Potential for Underwater Noise)**

There is a potential that unexploded munitions (UXO) may be present along the offshore pipeline route. Identified UXO have been assessed and where necessary some UXO may need to be cleared by detonation. Underwater noise generated by detonation of UXO may impact on marine fauna, including harbour porpoise, ringed seal and grey seals. In the Swedish EEZ, however, all UXO finds have been managed via local re-routing so that no munitions clearance will be required.

### **3.7 Environmental Monitoring Stations**

Environmental monitoring is a well-established function of the Helsinki Convention (HELCOM). The most relevant station in the Swedish EEZ is at a sufficient distance to avoid any impacts, approx. 3 km away from the proposed pipeline route, where investigations are undertaken on bottom sediments (contaminants and benthic macrofauna).

### **3.8 Transboundary Aspects**

The project will be constructed in the vicinity of Sweden's national borders with Denmark and Finland. All potentially affected countries (see chapter 4.1) were consulted during the Espoo consultation process.

## **4 Identification of Stakeholders**

### **4.1 Overview**

Stakeholders are individuals, groups, or organization who:

- May be directly or indirectly, positively or negatively impacted by the Project;
- May be interested in the Project, have environmental and social interests that may be impacted in the course of the Project, or may potentially influence Project implementation in certain ways.

The Project stakeholders may be subdivided into international, state (federal), regional, and local stakeholders.

In order to ensure an efficient and targeted stakeholder engagement process the following classification has been introduced:

- Affected stakeholders: individuals, groups and organizations directly influenced by the Project (actually or potentially, positively or negatively). Affected stakeholders include vulnerable groups: individuals that may be disproportionately impacted by the Project or eventually find themselves in a disadvantaged position in comparison with other public groups due to their vulnerable position. Interaction with these groups may demand additional efforts to ensure that such groups have equal representation during consultations and in the decision-making process.
- Interested parties: individuals, groups and organizations who are not necessarily directly affected by the Project but believe that the Project may somehow affect their interests and/or are capable of impacting the Project in any way.
- Parties affected by transboundary impact. According to the Espoo Convention, these include:
  - 'Party of origin' means the Contracting Party or Parties to this Convention under whose jurisdiction a proposed activity is envisaged to take place.
  - 'Affected party' means the Contracting Party or Parties to this Convention likely to be affected by the transboundary impact of a proposed activity. For the Nord Stream 2 Project in Sweden the affected parties consist of Russia, Estonia, Latvia, Lithuania, Poland, Finland, Denmark, and Germany.

Stakeholder identification has been made, firstly, through the consideration of the potential stakeholder relevant to each of the key Project socio-economic and environmental issues described in Section 3. Secondly, stakeholders have been identified based on the experiences of the first Nord Stream project and during the project extension phase. Thirdly, stakeholders are being identified, taking into account the to-date engagement process.

Stakeholders are identified through consideration of both groups/individuals that may be influenced by the Project and those that may influence the Project. Prioritization is generally given to Project Affected stakeholders.

The stakeholder list is reviewed periodically and updated as necessary through the lifecycle of the Project to reflect new information and the evolving status of the Project.

The categories of stakeholders at the local, regional, national and international levels is summarized in Attachment 1, broken down by Interested parties, Affected Stakeholders.



## 4.2 Affected Stakeholders

The following groups of affected stakeholders have been identified:

- Cable owners,
- Fishing companies and fishermen associations,
- Local community, incl. sailing individuals,
- Local authorities,
- Commercial enterprises

The identification of Affected Stakeholders through consideration of each of the relevant key socio-economic and environmental aspects is presented in Table 1.

**Table 1 Identification of Affected Stakeholders**

<b>Socio-economic environmental aspect</b>	<b>/ Affected Stakeholders</b>
Community health, safety, security	<p>Authority</p> <ul style="list-style-type: none"> <li>• Municipality of Karlshamn</li> <li>• County Administrative Board Gotland</li> <li>• County Administrative Board Blekinge</li> </ul> <p>Commercial enterprise:</p> <ul style="list-style-type: none"> <li>• Port of Karlshamn, owned by the municipality of Karlshamn</li> </ul> <p>Local community, incl.:</p> <ul style="list-style-type: none"> <li>• Sailing individuals, relevant ports and sailing groups.</li> <li>• Owners of summerhouses in the vicinity of the port of Karlshamn</li> </ul>
Ecosystem services	<p>Approximately 100 to 200 commercial fishermen, largely represented by various Producer Organizations (PO) for demersal resp. pelagic fishing, mainly:</p> <ul style="list-style-type: none"> <li>• Swedish Fishermen Producer-organisation (SFPO)</li> <li>• Swedish Ocean and Coast Fishermen Producer-organisation (HKPO)</li> <li>• Swedish Pelagic Federation Producer-organisation (SPFPO)</li> </ul> <p>Local community, incl.:</p> <ul style="list-style-type: none"> <li>• Approximately 100 local and regional recreational sailors</li> </ul>
Marine infrastructure and military activities	<ul style="list-style-type: none"> <li>• Shipping: Ferry operators, ports and commercial shipping companies</li> <li>• Cable operators</li> <li>• Pipeline operators</li> </ul>
Munitions clearance	<ul style="list-style-type: none"> <li>• Swedish Coast Guard</li> <li>• Swedish Armed Forces</li> <li>• Swedish Maritime Administration</li> </ul>

**Vulnerable groups.** As part of the process for identifying stakeholders, the Company has considered whether there are any vulnerable people/groups, which meet the criteria, for identifying such people/groups, presented in IFC's Performance Standard 1. It has been concluded that there are no such people/groups that will be disproportionately or differentially affected by adverse Project impacts (such as changes in livelihoods and health status) and which are either a) not able to participate in the engagement process or b) not able to participate effectively. This conclusion has been reached based on the following considerations:

- there are no individuals or groups that may be considered to be vulnerable because of their race, colour, sex/sexual orientation, language, religion, political or other opinions, national or social origin, educational status (literacy), level of poverty, status in relation to property, or other signifiers of social status that may be a basis for discriminatory behaviour by members of the majority population.
- potentially vulnerable people/groups; such as the elderly, those with disabilities or those classed as being chronically sick are very likely to be members of informal social support networks or in receipt of public sector assistance which will provide the means by which most individuals with a disability or chronic illness can participate in engagement activities and make their views known to the permitting authorities and the Company.

#### 4.3 Interested Stakeholders

Interested parties include groups that are not directly affected by the Project, including the following (see Annex 1 for further details of specific Interested Parties identified):

- Government stakeholders: regional and federal supervisory and executive authorities, including divisions and territorial departments for minorities, environmental management and protection (including water resources, forestry, hydrometeorology, and subsoil management), for consumer rights and well-being protection, technical supervision, emergency recovery, social protection, employment and cultural heritage.

Governmental Stakeholders include authorities, responsible for Project permits and identified following legal requirements:

- Federal Authorities
- Ministry of Enterprise and Innovation (permitting)

Other authorities are continuously being informed and consulted on Project matters as appropriate following legislative requirements and via informal consultation. A detailed list is included in Annex 1.

- Convention Officials: Espoo convention focal point representatives, HELCOM representatives; affected countries representatives in Espoo conventions.
- Public organizations:
  - regional, national and international non-governmental organizations aimed at protecting environmental, social and economic interests of the population and the rights of indigenous peoples.

- cultural organizations; scientific and research organizations and laboratories, and educational institutions: schools, universities, academies.
- municipalities and public organizations and representatives of the countries that may be under transboundary impact during the Project as per the Espoo convention.
- Mass media and the initiative groups related to them, including local, regional, and national printed and broadcasting mass media, social media.

The identification of Interested parties through consideration of each of the relevant key socio-economic and environmental issues is presented in Table 2.

**Table 2 Identification of Interested parties**

<b>Socio-economic / environmental aspect</b>	<b>Interested parties</b>
Biodiversity and environment	<ul style="list-style-type: none"> <li>• Permitting authorities</li> <li>• HELCOM</li> <li>• NGOs: <ul style="list-style-type: none"> <li>○ WWF Sweden</li> <li>○ Greenpeace Nordic</li> <li>○ Coalition Clean Baltic</li> <li>○ Swedish Society for Nature Conservation</li> <li>○ Birdlife Sweden</li> <li>○ ClientEarth Prawniczy dla Ziemi (Poland)</li> </ul> </li> </ul>
Cultural heritage	<ul style="list-style-type: none"> <li>• Swedish National Heritage Board</li> <li>• Swedish Maritime Museums</li> </ul>
Environmental monitoring stations	<ul style="list-style-type: none"> <li>• HELCOM</li> <li>• Environmental Protection Agency</li> <li>• SGU</li> <li>• SMHI</li> </ul>
Transboundary impacts	<ul style="list-style-type: none"> <li>• Espoo convention focal point</li> <li>• Swedish, Finnish and Danish authorities</li> <li>• Affected Parties</li> </ul>

Ministry of Enterprise's has involved 69 stakeholders (including authorities, cultural and scientific organisations, municipalities, NGOs) in consultations, distributing the Swedish application on public referral. All stakeholders are listed in the Annex 1.

## 5 Stakeholder Engagement Activities Undertaken to Date

A summary of the consultations undertaken to date is provided in Table 3 below.

**Table 3 National and international consultations, and other stakeholder engagement activities**

Type of Stakeholder	Description of Engagement	Date	Issues Raised
Authorities	Information meetings	Summer and winter 2012	General project related issues such as time line, crossings, lay techniques, routing, impacts etc.
Authorities, NGOs, general public	Public Information Document (PID) published	April 2013	See Table in Chapter 3 of the ES
General public	Public meeting on Gotland	May 2013	Pipeline safety, decommissioning, use of harbours, pipeline separation, availability of project data.
Authorities, NGOs, general public	Public national consultation of the Swedish EIA Program	April-June 2013	See Table in Chapter 3 of the ES
Authorities	Information meetings	April-June 2013	Various meetings depending on the specific expert area of the authority
Authorities, NGOs	Project information update, via a letter	Q4 2015	Project time line, contact information etc.
Commercial organizations	Contacts with the Swedish Fishermen Association and Producer Organizations	Q4 2015 – Q1 2018	Routing, pipeline separation, risks, compensation
NGOs	Contacts with WWF Sweden, the Swedish Society for Nature Conservation (SSNC) and Coalition Clean Baltic	Q2 2016 – Q3 2017	Political aspects, monitoring results, potential impacts on harbour porpoise, N2000 etc.
Authorities	Natura 2000 consultation	Q2 2016 – Q3 2016	Potential impacts on harbour porpoise, underwater noise, effects of munitions clearance
Authorities, NGO, commercial organizations, general public	Public consultation period	06.04.2017-07.06.2017	Referral statements related to many various aspects of the Project
Media	Press trip to Russia (St. Petersburg and Portovaya, the landfall of NSP)	Q2 2017	Information about the NSP2 Project, operation of the NSP pipeline, future of the European gas market

Media	Press trip with surveying vessel in Swedish waters	Q2 2017	Live surveying of the seabed in the vicinity of the port of Karlskrona, located near Karlshamn
General public, authorities	Public hearing, Stockholm	May 2, 2017	Information meeting open to all, allowing interaction with the Swedish Espoo coordinating authority – the Swedish EPA, the Swedish permitting authority – the Ministry of Enterprise and Innovation – as well as NSP2 representatives.
Media	Information meeting with Wasco, Karlshamn	Q3 2017	Information about upcoming pipe storage activities in the port of Karlshamn
Cable owners	Project information via letters	Q3 2017 – Q1 2019	General project information ahead of preparatory seabed intervention works and crossing agreements
Shipping authorities	Information and consultation meetings	Q3 2017 - present	Information and consultations about e.g. the planned and ongoing construction activities in Swedish EEZ
Environmental authorities	Information and consultation meetings	Q3 2017 - present	Information and consultations about e.g. the planned monitoring program to be implemented during construction and operation
Coast Guard	Compliance meetings	Q3 2018 - present	Project presentations and follow up of permit commitments

## 5.1 EIA / Permitting phase

**National ES/EIA and Espoo consultations.** Both national and international consultations were undertaken prior to the drafting of the national ES/EIA and Espoo documentation. During this consultation process, several meetings were held with authorities and organizations and public meetings were also held, on the island of Gotland and in Stockholm.

Stakeholder concerns and comments have been taken into account when investigating baseline conditions, developing the Project, and in assessing and mitigating potential impacts.

The consultation has been undertaken at international level, namely the Espoo notification and the consultation on the Project Information Document (PID). A national consultation process has also been held with various authorities and organizations.

Many of engagement activities took place before the national ES and permit application was finalized and submitted in September 2016. This since the permit process thereafter is formalised under the responsibility of the Ministry of Enterprise and Innovation. The ES includes details of the engagement activities carried out and a description of how the stakeholders' feedback have been incorporated in the application documentation can be found. The statements from stakeholders were analysed and taken into consideration when developing the ES. A Supplement responding to questions raised during the administrative referral phase (when 13 key authorities were asked to provide feedback on the application documentation) was provided in February 2017.

After an initial review period by the Ministry of Enterprise and Innovation and key authorities, the Swedish permit application – which contains the Environmental Study – was sent out for public referral in April 2017. During the public referral, Swedish authorities, citizens and other interested parties had the opportunity to state their opinions on the EIA documentation. International opinions and statements were also requested. At the end of the public referral in June 2017, Nord Stream 2 received all statements and provided answers to the statements made by national and international stakeholders during Q3 and Q4 2017.

**HELCOM consultation.** NSP2 provided information on the project during the 52 and 53 Heads of Delegation meetings. The information is included in HELCOM materials available on the web-site <https://portal.helcom.fi/meetings/hod%2053-2017-465/default.aspx> and <https://portal.helcom.fi/meetings/hod%2052-2017-405/default.aspx>

**Fishermen.** The Company has been engaging and will engage with local fishermen through the construction phase of the project to understand their concerns and to avoid or minimise potential adverse impacts. Nord Stream 2 has developed a compensation model for bottom trawlers in conjunction with the relevant national agencies and fishermen's associations. Agreements are concluded with fishery associations in all the nine Baltic Sea countries. Associations are required to cover individual fishermen<sup>1</sup>. Negotiations to reach agreements with fishery associations were carried out by NSP2. Permanent contacts were established and will be maintained during the project execution.

**Cable owners.** Negotiations to reach agreements with cable owners were carried out by NSP2. Crossing agreements have been proposed to all the respective owners. Permanent contacts were established and will be maintained during the project execution.

The Swedish government granted the construction and operation permit for the section of the NSP2 Pipeline stretching through Swedish EEZ on June 7, 2018. This permit contains conditions and commitments, which NSP2 naturally will respect.

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<sup>1</sup> W-HS-EMS-GEN-PAR-800-FISHEREN-01 Fisheries Livelihood Plan

## 5.2 Construction phase

**Notifications.** Detailed information about project construction activities is sent to the authorities on a regular basis (daily, weekly and monthly) as defined in the permit. Fishermen, mariners and cable owners are also informed of the planned activities on a monthly basis in order they are able to plan the work accordingly. Information about the works to be performed for NSP2 projects, can also be found on the Notices to Mariners web-page, available at: <http://www.sjofartsverket.se/sv/Sjofart/Sjokort/Ufs---Underrattelser-for-sjofarande-/Sok-i-databasen11/>

A full list of stakeholder engagement activities undertaken to date is included in the Stakeholders Engagement Register, which is an internal tool for tracking the stakeholders' engagement activities carried out by NSP2. The register does, however, not include information shared in regular notifications, calls and e-mail exchange.

## 5.3 Issues Raised

A summary of the stakeholder comments by category is provided in Table 4.

**Table 4 Categories of comments from stakeholders during the national consultation phase**

Category	Focus area	Stakeholders (selection)
Scope of the Environmental Study	Areas to be described and assessed in the Environmental Study	County Administrative Board (CAB) Kalmar, GoU, CAB Gotland, Swedish Agency for Marine and Water Management (SwAM), Geological Survey of Sweden (SGU), KaK
Environmental monitoring	Monitoring close to Natura 2000 areas, scope of monitoring program	CAB Kalmar, SwAM, SGU
Protected areas	Impact on Natura 2000 areas	SwAM, CAB Blekinge, CAB Gotland
Routing	Zero alternative, alternative routing	CAB Gotland, Swedish Transport Administration (TrV), Swedish Maritime Agency (SMA), SwAM, CAB Blekinge, Swedish Transport Agency (STA)
Legal	International conventions, involvement of authorities, new proposed maritime borders, financial security, compensation, Heritage Conservation Act, Marine Strategy Framework Directive	CAB Gotland, TrV, SMA, CAB Blekinge, SwAM, STA, SGU
Construction	Decommissioning, seabed works, pipe-laying vessels, pre-commissioning	CAB Gotland, SwAM, CAB Blekinge, SGU
Risks	Emergency anchoring zones, maritime traffic, fishery, oil spill	TrV, SMA, SwAM, STA, SGU, SBA
Marine mammals, birds and fish	Time schedule, harbour porpoise, important fish spawning areas	SwAM, EPA, CAB Blekinge
Seabed and sediments	Landslides, reef effect	SGU, SwAM
Cumulative effects	Other infrastructure projects	SwAM, SGU



A number of examples of how these comments have been considered throughout the course of the Project are as follows:

- SMA, STA and SwAM requested the implementation of a risk assessment in respect of the potential consequences of emergency anchoring in the shallow bank areas south of Gotland. Such a risk assessment has been implemented (with the participation of the authorities referred to above) and the main report is enclosed as Annex 12 to the ES.
- SGU requested the attachment of a detailed technical description to the application, which includes the activities that will affect the seabed, such as rock placement, trenching, etc., in addition to the ES.
- SwAM requested that monitoring of sediment spreading and underwater noise in the Natura 2000 area *Hoburgs bank och Midsjöbankarna* should be included in the monitoring program for Nord Stream 2. Nord Stream 2 AG agreed and has since suggested that sediment spreading and underwater noise measurements should be part of the monitoring program.

A summary of the most important comments from the international consultation is presented in Table 5 below.

**Table 5 Summary of key issues raised during the international consultation process**

Key issues	Projects focus in on-going work following consultation
Marine mammals, birds and fish spawning/nursery areas	Minimizing impacts on marine mammals, birds and fish spawning/nursery areas.
Seabed and sediments	Minimizing impacts on seabed and sediments.
Planned and future projects, fishing, maritime traffic, chemical munitions and cultural heritage	Planned and future projects, fishing, maritime traffic, chemical munitions and cultural heritage.
Direct and indirect cumulative impacts	Addressing of direct and indirect cumulative impacts.
Alternatives and zero alternative	Investigation of alternative routes and the zero alternative.
Risk assessments	Emergency preparedness.

The Polish NGO ClientEarth Prawniczy dla Ziemi in September 2018 submitted an appeal against the Swedish construction and operation permit during the appeal period, in accordance with the legal requirements. The appeal was, however, dismissed by the Swedish Supreme Administrative Court in December 2018, as ClientEarth did not fulfil the criteria required to file an appeal in Sweden. The court notably stated that the NGO has its base abroad, and has fewer than 100 active members in Sweden (the minimum required) to be granted legal standing.

### 5.1.2. Grievances

No grievances related to impacts from the project's operations have so far been filed in Sweden.

## 6 Planned Stakeholder Engagement Activities

This section contains a description of the general approach to stakeholder engagement and available information disclosure processes. This is subject for update on the next stages of the Project.

### 6.1 Possible Means of Engagement

The main mechanisms of information disclosure and stakeholder consultation are presented below. This section describes the means of engagement that **potentially** could be used in the context of the Project. The program presented in section 6.2 identifies methods that have been used or actually are planned at this stage.

**Information distribution.** Announcements about socially important events, organized by the Company, and also other needed information could be circulated and published as follows:

- Mass media: federal, regional, local newspapers.
  - Media briefings and press conferences. National, regional and local media briefings and press conferences, organized on a regular basis to provide accurate and current information of the project and its progress.
  - Press releases. The general public could be informed via media of all relevant and important project milestones and current activities with press releases with direct distribution and placement on the Nord Stream 2 website.
- Printed announcements, posted for local communities, give-aways
- Exchange of letters
- Brief information
- Web-site <http://www.nord-stream2.com/>
  - General, as well as specific project information is published on the company's homepage:  
<https://www.nord-stream2.com/permitting-sweden/swedish-permittingprocess/>
  - Announcements published on the company's homepage.
- Notices to Mariners web-pages:
  - <http://www.sjofartsverket.se/sv/Sjofart/Sjokort/Ufs---Underrattelser-for-sjofarande-/Sok-i-databasen11/>
- Social media
  - Project relevant information could be distributed regularly via social media channels, namely via Twitter and LinkedIn to various stakeholders, such as media, think tanks, local stakeholders and general public via Corporate and country Twitter accounts and LinkedIn.

**Public hearing(s):** During the public participation period of national EIA's and the international Espoo report, public hearings were held in order to give the public an opportunity to participate and comment on the possible consequences of the project in Sweden as well as in the other countries along the pipeline route.

**Public liaison offices.** The public liaison offices can be opened by the authority to bring relevant information to communities by posting hard copies of Project documents at public places.

**Targeted informing and consulting.** Implemented through direct contacts of Project authorized persons with representatives of stakeholders or by using the telephone and on-line communication tools. Target information includes notifications to potentially affected stakeholders: fishermen, cable owners, mariners. Established contacts with representatives of the authorities, commercial enterprises and organizations, NGOs could be used in the targeted informing procedures.

**Meetings.** Meetings with stakeholders to inform them about the Project and its implementation progress and ensure a constructive dialog and exchange of opinions and information. Meetings can include:

- Community meetings
- One-to-one meetings with different stakeholders from the list

**Joint participation in public activities** can be coordinated with the contractors within the framework of ancillary activities for relevant stakeholder engagement and environmental and social management.

**Workshops, forums and conferences.** The Project consider forum as an important platform to bring together various stakeholders and as powerful tools for sharing ideas, building consensus and developing commitment.

**Visits to the site and Project facilities.** Basically, the Project facilities are not of significant interest for visits due to their predominantly linear arrangement. Nonetheless, options can be examined to ensure stakeholders safe visits to the sites of the Project and its contractors. Site visits to the Nord Stream 2 pipeline's lay vessels may be organized for authorities and interested media, and site visits to the Nord Stream landfall have and can be organized for small groups of stakeholders.

## 6.2 Information Disclosure Plan

In implementing the Project, the Company is committed to the principle of establishing a constructive dialogue with stakeholders from the early project implementation stage. The disclosed information is clear and understandable and is in accordance with the stakeholder engagement process stage and the project implementation schedule.

Documents that should be disclosed during the EIA process are determined by the respective stages of the process. Documents that are disclosed at this stage are listed in Table 6 below:

**Table 6 Information disclosure plan**

Document Title	Disclosure Date	Topic	Means of Disclosure	Stakeholders
Leaflet Presentation Communication materials	On-going	General Project information	Meetings Web-site	All stakeholders
Environmental monitoring reports	2018 - 2019	Environmental monitoring during construction	Web-site	All stakeholders
Assessment of Navigational Risks in the Swedish Southern Sector for Nord Stream 2 Routes	07.04.2016	Shipping risks	Formal submission (digital)	Shipping authorities
Permit application <ul style="list-style-type: none"> <li>a legal application,</li> <li>a comprehensive environmental study (ES) with appendices,</li> <li>a technical description,</li> <li>maps (atlases).</li> <li>details of the notification procedure to inform mariners of the navigation exclusion zones during construction,</li> <li>plans for a grievance mechanism to be prepared ahead of the public consultation phase.</li> </ul>	16.09.2016	Permit application	Formal submission (digital and hard copy)	Key ministries and authorities
Application Supplement	28.02.2017	Assessment of potential Natura 2000 impacts, project updates and responses to received authority statements	Formal submission (digital and hard copy)	Key ministries and authorities
Permit application documentation, including the Environmental Study and the Technical Description as well as administrative referral supplement	06.04.2017	Permit application, incl. supplement	Formal submission (digital and hard copy) Web-site (environmental study)	All stakeholders and general public
Espoo report	Q2 2017		Hard copy Web-site	All stakeholders and general public
Public referral rejoinders	Q3-Q4 2017	Responses to received consultation comments and project updates	Formal submission (digital)	Ministry of Enterprise and Innovation
Espoo referral rejoinder	Q3 2017	Responses to Espoo	Formal submission (digital and hard copy)	All

		consultation comments		stakeholders and general public
Stakeholder Engagement Plan	Q1 2018, Q1 2019	Stakeholder Engagement Plan	Web-site	All stakeholders and general public

Information that will be disclosed for stakeholders during the construction and operation stages of the Project will include Project progress and performance reports and other project-related materials.

### 6.3 Stakeholder Engagement Activities

An overview of the planned stakeholder engagement activities with a breakdown by stakeholder group and Project phase is given in the Table 7. This table is being updated throughout the life cycle of the Project. Where reasonably possible, engagement activities will be combined for different objectives.

**Table 7 Stakeholder engagement program**

Stakeholder / Stakeholder Category	Engagement topic	Stakeholder Engagement and Methods	Timing	Responsibility	Key Actions / Disclosed Information	Location / Engagement Outputs
<b>Construction phase</b>						
Swedish Armed Forces	Munitions clearance	Information distribution	Regular 2018-2019	Authority / Nord Stream 2 AG	Project implementation	tbc (if needed)
Shipping authorities	Project activities	Information distribution	Regular 2018-2019	Authority / Nord Stream 2 AG	Project implementation	Daily information e-mails from the involved vessels, information meetings regularly held
Marine users, fishermen, cable owners	Project activities	Target information	Regular on a monthly basis 2018-2019	Nord Stream 2 AG	Notifications via e-mails	Mitigation of potential impacts during construction
Local communities	Project activities	Information distribution	Upon request 2018-2019	Municipality / Nord Stream 2 AG	Project implementation	tbc (if needed)
Authorities	Environmental monitoring	Web-site, meetings	Regular 2018-2019	Nord Stream 2 AG	Monitoring results reports	Web-site
<b>Operational phase</b>						

Stakeholder / Stakeholder Category	Engagement topic	Stakeholder Engagement and Methods	Timing	Responsibility	Key Actions / Disclosed Information	Location / Engagement Outputs
All stakeholders	Project implementation, environmental monitoring	tbc	yearly	Nord Stream 2 AG	Project reporting	tbc



## 7 Stakeholder Engagement Data Management

Stakeholder opinions and concerns are taken into account by the Company as a valuable source of information to optimize the design and outcome of the Project. The results of stakeholder engagement events will be systematically collected and included in a Company stakeholder database enabling tracking and monitoring of all follow-up actions required.

The general decision-making process is described below in order to:

- Demonstrate transparency;
- Provide information about the Company's resources and decision-making level relevant to the raised issues; and
- Describe general procedures of addressing stakeholders' feedback.

A detailed internal procedure is used to manage stakeholder feedback (comments, grievances, etc.) so that it can be promptly processed and analysed by the Company personnel. A dedicated grievance mechanism procedure<sup>2</sup> was developed and implemented by NSP2 to ensure grievances are managed and addressed in line with international requirements.

Stakeholders' feedback and grievances have been systematically collected and included in a Project Information Management System, enabling tracking and monitoring of follow up actions that may be required.

### 7.1 Means of Receiving Feedbacks

Stakeholders can submit a question, request for information/clarification, provide an opinion, or submit a concern or a grievance directly to the Company at any time using the contact points provided below:

#### Direct Contact:

- E-mails: [sverige@nord-stream2.com](mailto:sverige@nord-stream2.com)  
[info@nord-stream2.com](mailto:info@nord-stream2.com)  
[press@nord-stream2.com](mailto:press@nord-stream2.com)
- Post: Baarerstrasse 52, 6300 Zug, Switzerland
- Telephone: +46705905519 (for media contacts)

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<sup>2</sup> W-HS-EMS-GEN-PRO-800-GRIMECEN-02 Grievance mechanism procedure

+46764076953 (for general project-related information)

### ***Feedback communicated at meetings***

Feedback provided by stakeholders during one to one meetings, roundtable meetings, public hearings or community meetings has and will be recorded in minutes of the meeting.

## **7.2 Grievance Mechanism**

A Grievance Mechanism is established to receive and facilitate resolution of external stakeholder grievances concerning the Project. As necessary, specific measures targeted at certain stakeholders, such as those in nearby communities, may be required to ensure effective disclosure of the Grievance Mechanism.

A ***grievance*** is a complaint raised by an external stakeholder (individual or group), related to a specific impact or incident, and which needs to be formally registered and addressed through the Grievance Mechanism. Grievances can result from either real or perceived impacts of the Company's operations, including those of contractors.

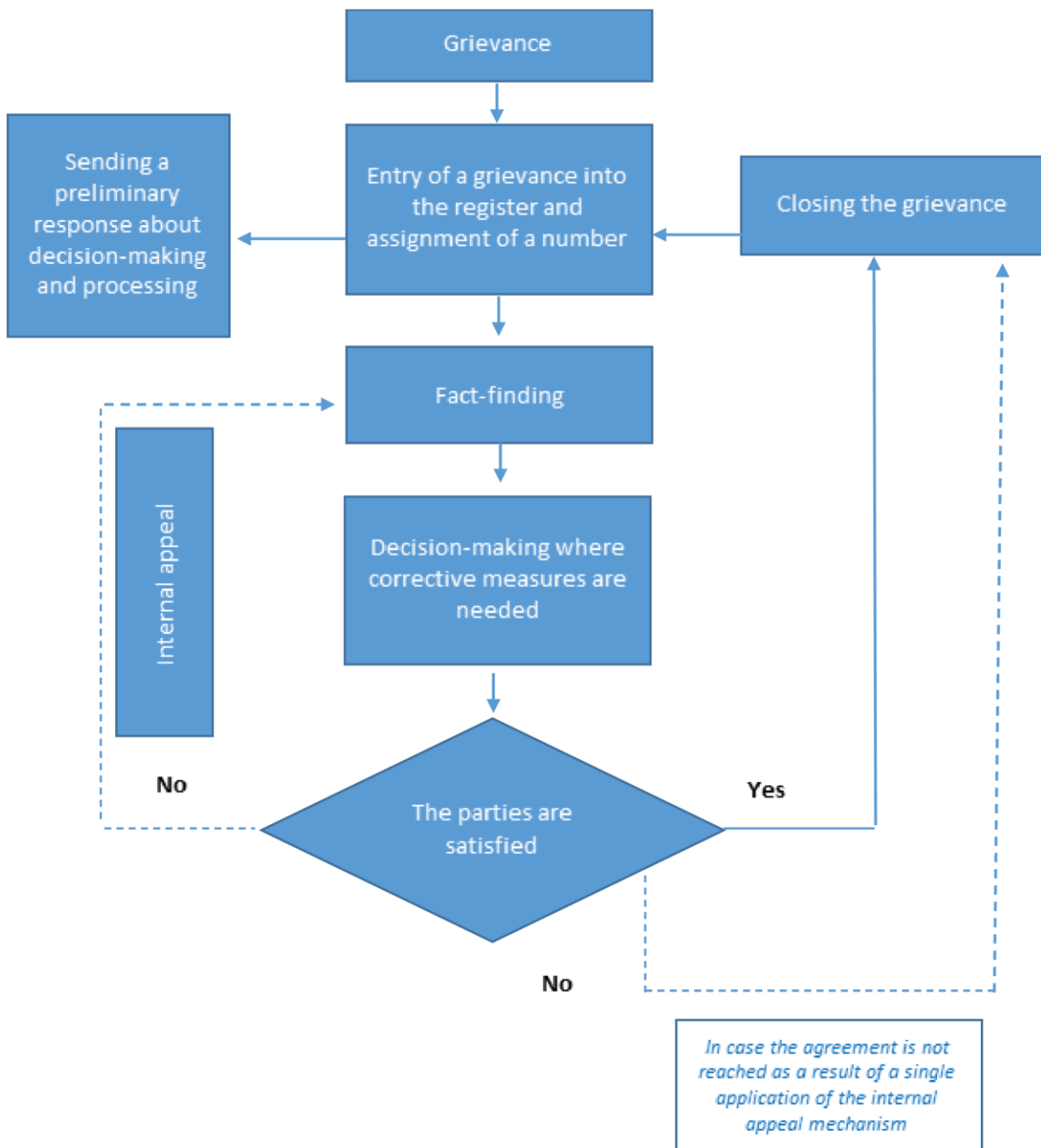
The Grievance Mechanism serves to:

- Minimize any adverse impacts of the Project on external stakeholders via quick and mutually acceptable resolution of grievances;
- Identify emerging adverse trends in terms of incidents/impacts at an early stage so that measures to prevent/avoid their occurrence can be implemented quickly and proactively;
- Demonstrate the Company's respect for the interests of external stakeholders.

Key principles of the grievance management process are:

- Any person, group or organization can submit grievances at any time, without fear of retribution and at no financial cost.
- All grievances will be taken seriously and will be treated in a fair and respectful manner. The Company will respond to the complainant to confirm receipt of the grievance within seven working days.
- The process by which grievances will be received, investigated and resolved will be consistent and transparent. Representatives of contractors may be involved in the investigation where applicable.
- Information relating to a grievance investigations and eventual decision will be documented.
- Complainants will have recourse to an internal Company appeal mechanism if the complainant rejects the (first) decision.
- Personal information about the affected stakeholders will be treated as confidential (in accordance with the requirements of the current legislation).
- The mechanism will not impede access to judicial or administrative remedies.

The Grievance Mechanism procedure is illustrated in Figure 4 and described below:



**Figure 4 Grievance investigation flowchart**

### **Stage 1: Grievance communication and logging (registration)**

Grievances can be submitted via any stakeholder engagement and communication channel functional at the time of submission (including direct to the Company in Switzerland via e-mail

address, telephone, and the mailing address as shown in section 7.1 above). All grievances will be logged.

### ***Stage 2: Acceptance of grievance for investigation***

The Company will respond to the complainant and confirm receipt of the grievance within seven working days from receipt.

### ***Stage 3: Notification***

As well as a confirmation of receipt, the complainant will also be provided with information about response times, next steps and a contact name with contact co-ordinates within the Company.

### ***Stage 4. Investigation***

The Company will investigate grievances and their surrounding circumstances. These investigations will involve various Project units and, if necessary, may involve consultation with the complainant. The Company will strive to complete the process of investigating the incoming grievances and identifying a resolution within 30 calendar days, and in more complex cases – within 45 calendar days of the receipt of a grievance.

### ***Step 5: Resolution***

A proposed resolution will be based on the results of the investigation. The proposed resolution will then be formally communicated to the complainant. The complainant will be first notified on the resolution process progress in 30 days period, and afterwards when the resolution is identified (in case it takes 45 days). If the proposed resolution is not accepted, the case may be resolved via application of an internal appeal process.

### ***Stage 6: Monitoring and evaluation***

After the accepted resolution has been implemented, it will be monitored and its effectiveness will be evaluated for a period of time agreed between the complainant and the Company. Relevant actions will be added to the Project commitments register.

Contractors may implement their own Grievance Mechanisms, but they must be aligned with the Company's Grievance Mechanism and they cannot be implemented until they have been formally approved by the Company. If contractors use their Grievance Mechanisms then contractors will report on the performance of the Grievance Mechanisms on a regular basis to the Company.

## **8 Resources and Implementation**

This Swedish SEP is a part of the environmental and social management system of the Project. Responsibility for the Swedish SEP implementation at the current project stage rests with the Permitting Department at the Head Office of the Project (Zug).

The procedures for approval of information materials, disclosed information and stakeholder engagement methods are supported by the communications department.

Grievances are managed and resolved by a commission consisting of technical specialists, permitting specialists, HSE experts and specialists who are responsible for the management system. These taskforces, which are set up by advisory boards, are managed by authorized specialists from the Head Office.

The Swedish SEP will be reviewed and updated on a regular basis during Project implementation as and when necessary, but at least once a year. Irrespective of this commitment, the Company will ensure that an updated Swedish SEP is prepared prior to any important phase of stakeholder engagement and prior to initiation of construction activities and commissioning/operations. This will ensure the credibility and relevance of information contained in the Swedish SEP, and will also ensure that the stakeholder engagement methods are in compliance with the legislative requirements and with the conditions of the Project implementation at different stages. Any significant changes relating to project activities and implementation schedule will be properly accounted for in each update of the Swedish SEP.

## **9 Monitoring and Reporting**

It is important to monitor stakeholder engagement to ensure that consultation and disclosure efforts are effective, and in particular that stakeholders have been meaningfully consulted throughout the process. Stakeholder engagement monitoring will be part of the Project Environmental and Social Management System.

Monitoring will include:

- auditing the implementation of the SEP;
- monitoring consultation activities conducted with interested and affected stakeholders;
- monitoring the effectiveness of the engagement processes in managing impacts and expectations by tracking feedback received from engagement activities and recording and tracking commitments made to stakeholders; and
- monitoring any grievances received and their resolution.

Performance will be reviewed regularly against the SEP. Tracking of stakeholder engagement will be used to assess the effectiveness of the engagement activities. Indicators for tracking will include:

- materials disseminated: types, frequency, and location;
- place and time of formal engagement activities and level of participation including by specific stakeholder groups;
- number of comments by topic and type of stakeholder, and details of feedback provided;
- numbers and types of grievances and the nature and timing of their resolution; and
- community attitudes and perceptions based on media reports and stakeholder feedback.

Stakeholder Engagement reports will be prepared and disclosed by Nord Stream 2 AG on a yearly basis.

# **Annex 1**

## **Project Stakeholders List**

**Table A1: Summary of affected parties and corresponding key representatives divided following their geographical distribution**

Stakeholder level	Stakeholder category	Stakeholder
<b>Affected Stakeholders</b>		
International	Cable owners	TeliaSonera Svenska Kraftnät LatTelecom Cinia Group Latvia State Radio and Television Centre
	Pipeline owners	Nord Stream Balticconnector
National	Commercial	Fishery PO's (SFPO, HKPO and SPFPO), SAKL (Swedish Fishermen's Organisation) and Swedish Fishermen's Economic Association Swedish Ship-owners' Association Swedish Ports association
Regional	Authorities	County Administrative Board Gotland County Administrative Board Blekinge
Local	City Representatives, and Local communities	Municipality of Karlshamn, and Engaged citizens, owners of summerhouses in the vicinity of the port of Karlshamn
	Ports	Port of Karlshamn, owned by the municipality of Karlshamn
	Recreational sailors	Sailing individuals, relevant ports and sailing groups.
<b>Interested Stakeholders</b>		
International	NGOs	Greenpeace WWF Coalition Clean Baltic ClientEarth Prawniczy dla Ziemi
	Media	AFP Bloomberg Thomson/Reuters TASS
National	NGOs	Swedish Society for Nature Protection Birdlife Sweden
	Authorities	Ministry of Enterprise and Innovation (permitting) Prime Minister's Office Ministry of Foreign Affairs Ministry of Defence Ministry of Environment Ministry of Finance Swedish Environmental Protection Agency Swedish Agency for Marine and Water Management Swedish National Heritage Board Swedish Civil Contingencies Agency Swedish Transport Administration Swedish Maritime Administration



		<p>Swedish Transport Agency Legal, Financial and Administration Services Agency Swedish Armed Forces Swedish Coast Guard Swedish Board of Agriculture National Board of Housing, Building and Planning Swedish Energy Agency National Defence Radio Establishment Swedish Police Swedish Defence Research Agency</p> <p>Geological Survey of Sweden Swedish Geotechnical Institute Swedish Maritime Museums The Swedish Meteorological and Hydrological Institute Department of Aquatic Resources at Swedish University of Agricultural Sciences Linnaeus University in Växjö University of Lund Baltic Sea Centre at Stockholm University Campus Gotland at Uppsala University World Maritime University in Malmö Swedish Institute for the Maritime Environment Swedish Species Information Centre</p> <p>TT Svensk Dagbladet Dagens Nyheter Dagens Industri Ny Teknik SR SVT TV4</p>
	Research institutes	
	Media	
Regional	Authorities	<p>County Administrative Board, Kalmar län County Administrative Board, Skåne län County Administrative Board, Stockholms län County Administrative Board, Södermanlands län County Administrative Board, Östergötlands län</p>
	Media	<p>Blekinge Läns Tidning Sydöstran SR Blekinge SVT Blekinge</p>

Local	Authorities	Karlskrona municipality Norrköping municipality Oskarshamn municipality Kalmar municipality Simrishamn municipality Borgholm municipality Bromölla municipality Kristianstad municipality Mönsterås municipality Mörbylånga municipality Nyköping municipality Nynäshamn municipality Oxelösund municipality Ronneby municipality Söderköping municipality Södertälje municipality Sölvesborg municipality Torsås municipality Trosa municipality Valdemarsvik municipality Västervik municipality Ystad municipality Region Gotland
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