

Nord Stream Project 2

**Stakeholder Engagement Plan for the Nord Stream Project 2 in
Germany**



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Abbreviations and Definitions

Affected communities	Local communities directly affected by the Project
BBergG	Federal Mining Act (Bundesberggesetz)
BNatSchG	Bundesnaturschutzgesetz
Company	Nord Stream 2 AG
Contractor	Any legal entity or physical person providing services to the Company
Cumulative effect	Combined impact of several sources spread in space or combined impact of one source spread in time.
GasHDrLtgV	High-Pressure Gas Pipeline Ordinance (Gashochdruckleitungsverordnung)
GRT	Gas Receiving Terminal
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
EnWG	Energy Industry Act (Energiewirtschaftsgesetz)
Espoo Convention	Convention on Environmental Impact Assessment in a Transboundary Context, 1991
Espoo Report	Report on environmental impact assessment in a transboundary context
GRS	Gas Receiving Station
IBA	Important Bird Area
IFC	International Finance Corporation
IFI	International Finance Institutions
NGO	Non-governmental organization
NSP2	Nord Stream 2 Project
NSP1	Nord Stream 1 Project
PID	Project Information Document
Project	Nord Stream 2 main gas pipeline construction project
PS	Performance Standards
PTA	Pig Trap Area
SEP	Stakeholder Engagement Plan
Stakeholders	Individuals or groups of individuals, who may be influenced in the course of a project or who may influence the development of a project.
TW	Territorial Waters

Executive summary

Background to the Nord Stream 2 Project

Nord Stream 2 Project (the “Project”) comprises the planning, construction and operation of a new strategic twin subsea pipeline (the “Pipeline”) that would connect European consumers with Russian gas fields. The Project will have the capacity to supply 55 billion m³ of natural gas per year. The Pipeline has a planned length of approximately 1200 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 will be 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 will be taken into account in the preparation and review of the Project's environmental and social assessments and management plans, and during the development of the design of the Project.

Nord Stream 2 AG Approach to Stakeholder Engagement

The Company is implementing a stakeholder engagement process across the entire Nord Stream 2 Project, and this is 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 through the entire Project lifecycle. To reflect this evolving process, the SEPs are intended as ‘living’ documents that will be updated as necessary through the Project lifecycle.

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 may remain that require 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. It is possible that additional stakeholder engagement specific to such assessments/plans may be required.

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

Personnel of the project and contracting organizations is not considered within this plan. This will be managed through the environmental and social management plan to be developed for the Project, as well as other procedural documents.

Stakeholder Engagement in Germany

This SEP applies to the Project component located within the jurisdiction of Germany and covers the planning, construction, operation and decommissioning of the Project facilities.

Decommissioning activities will take place at the end of 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 at the moment what risks could be associated with these activities and what engagement activities may consequently be required in accordance with the prevailing legal requirements at such time.

In addition, stakeholder engagement activities may also be appropriate in relation to third party “Associated Facilities” as defined in section 1.3.

The structure of this German SEP is as follows:

- Section 1 contains a brief description of the Project within German 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 how stakeholder engagement data will be managed.
- 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 billion m³ 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 (NSP1). The overall route of the Nord Stream 2 Pipeline is shown in Figure 1 below.

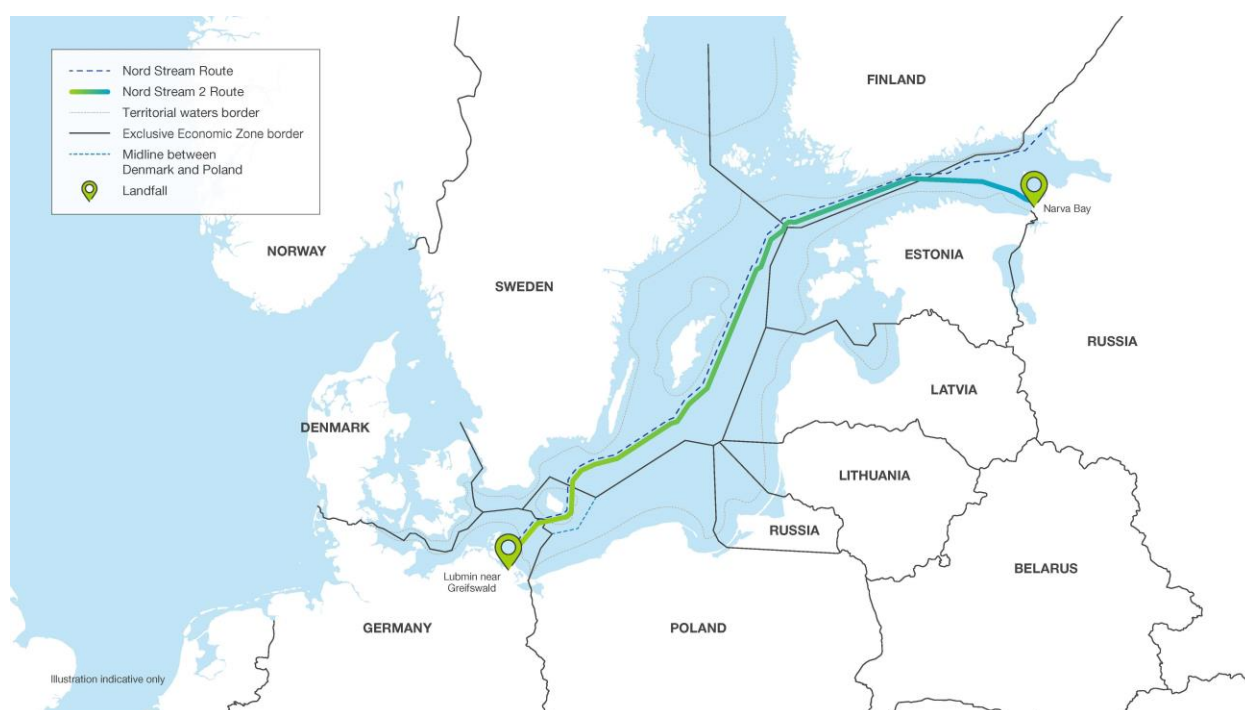


Figure 1 Overview of the Nord Stream 2 Pipeline Route

The components of the Nord Stream 2 Project within German jurisdiction are described in section 1.2 below. The onward distribution of the gas from the Project facilities at Lubmin will be via existing (e.g. the NEL pipeline) and new (e.g. the EUGAL pipeline) components of the gas network grid in Germany that are not part of the Nord Stream 2 Project. These, and other relevant non-Project facilities/activities, are described in section 1.3.

1.2 The Nord Stream 2 Project in Germany

The Project components within German jurisdiction include both offshore and onshore components.

The Pipeline route within the German EEZ and territorial waters is approximately 83km long. The Pipeline route enters the German EEZ south-east of Adlergrund and follows the route shown in Figure 2 to the landfall located west of Lubmin Harbour.

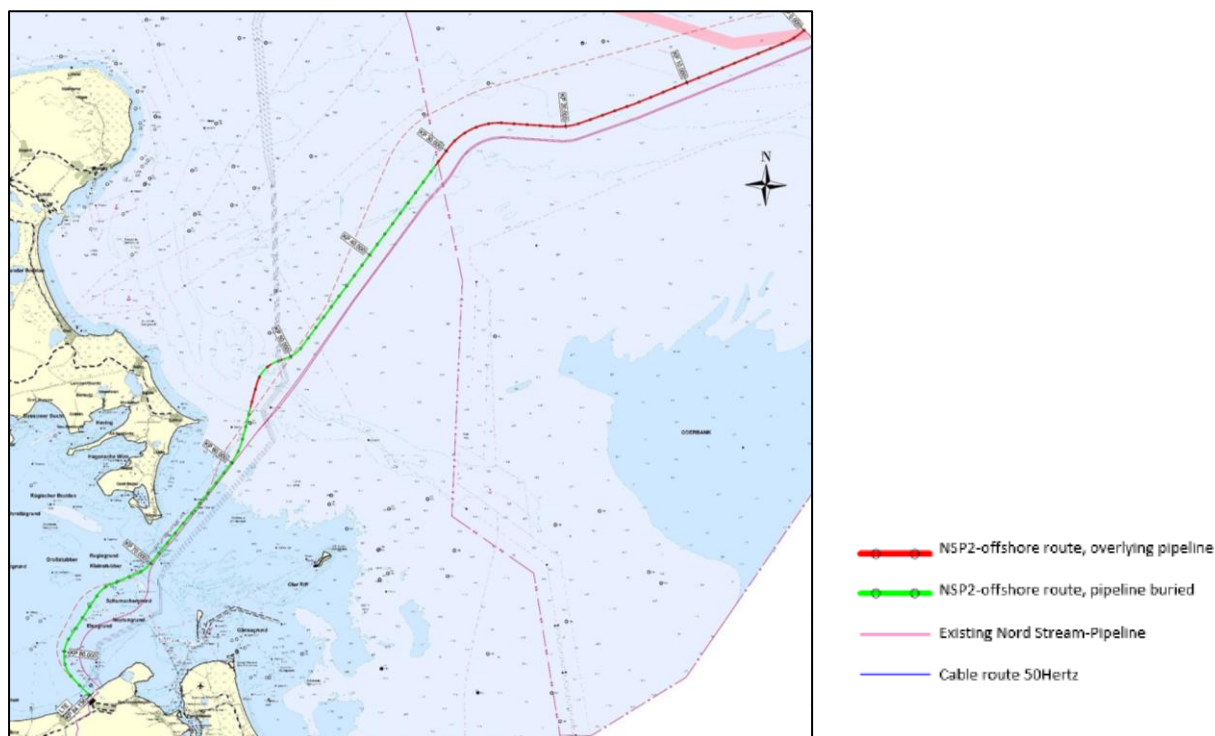


Figure 2 Route through the German EEZ, territorial zone and Landfall Location.

In the nearshore, shallow waters of Greifswalder Bodden and east of Rügen, the pipelines are buried through dredging and backfilling (approximately 50 km). The pipelines at the landfall are installed in two parallel approximately 700 m long micro tunnels that start onshore inside the pig trap area (PTA) and have exit points located offshore approximately 300 m from the shoreline. The pipeline terminates at a PTA within a Receiving Terminal located in the industrial area of Lubmin as shown in Figure 3.

The Receiving Terminal also comprises a Gas Receiving Station (GRS) which is not part of the Nord Stream 2 Project and is discussed further in section 1.3. The GRS and PTA are constructed simultaneously.

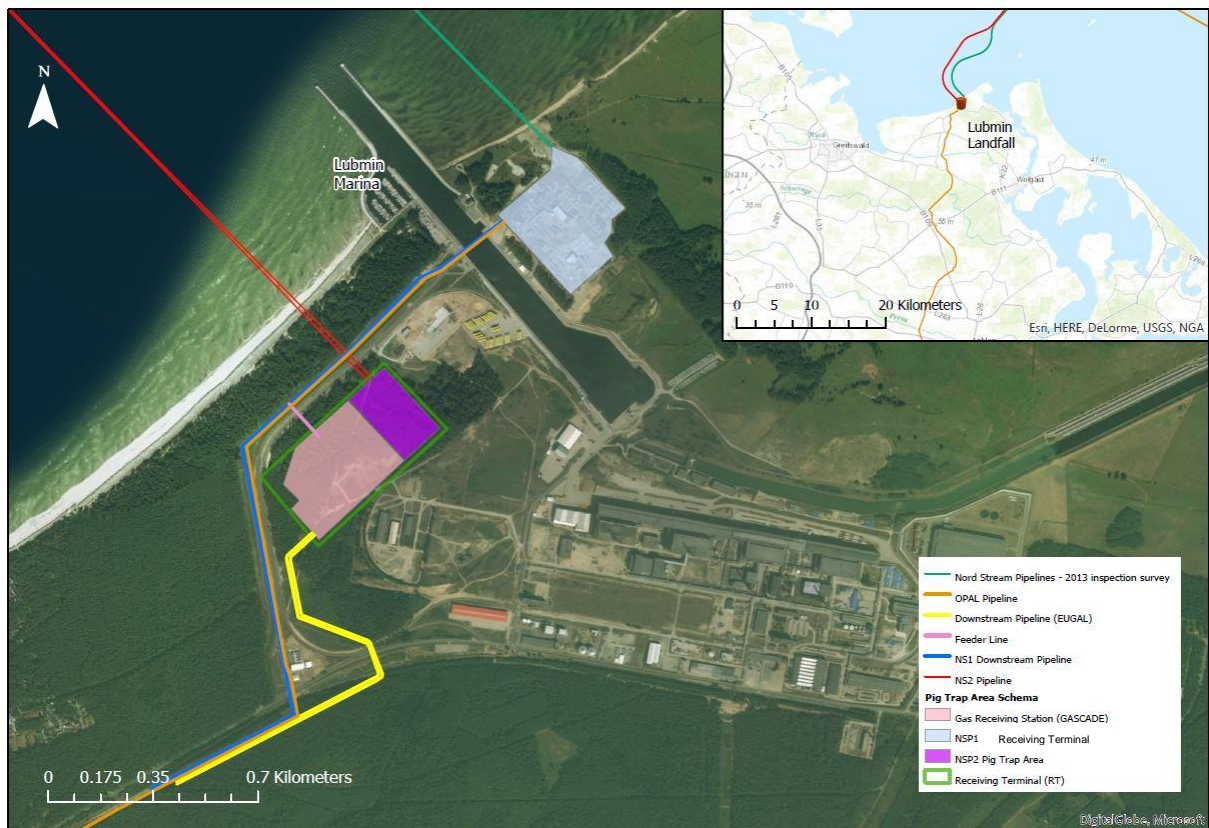


Figure 3 Landfall and Onshore Facilities

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

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

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 Relevant Non-Project Activities and Facilities

Associated Facilities are defined as facilities or activities that are not funded as part of the Nord Stream 2 Project. Associated Facilities in the German sector include:

- Pipelines from the PTA to the GRS
- The GRS
- Feeder line from GRT to existing NEL pipeline

- Parts of the proposed new EUGAL

1.4 Stages of Project Implementation

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

- EIA and permitting: Q4 2016 – Q1 2018
- construction – Q1 2018 – Q3 2019
- commissioning – end of 2019
- operation – end of 2019 onward (anticipated operating life of up to 50 years)
- decommissioning – end of operational life

2 Applicable Stakeholder Engagement Requirements

The stakeholder engagement activities described in this SEP are conducted in accordance with:

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

2.1 German Regulatory Requirements for Community Engagement

Territorial Waters (12-nm-Zone). A plan approval procedure (Planfeststellungsbeschluss) for the construction and operation of a gas pipeline having a diameter of more than 300 mm is required in the 12-nm-Zone pursuant to §43 Energy Industry Act (Energiewirtschaftsgesetz, hereinafter referred to as EnWG). Within the scope of the procedure for awarding the plan approval, a thorough environmental assessment was submitted to the responsible authority and a public consultation process was held. In addition, a technical assessment for the construction and operation of a high-pressure gas pipeline is required, but this assessment does not require public consultation. The Stralsund Mining Authority (Bergamt Stralsund) is appointed as the responsible authority for the procedure pursuant to §43 par. 1 EnWG and issued the plan approval on January 31st 2018.

Exclusive Economic Zone. In the German EEZ, a Mining Law permitting procedure pursuant to §133 par. 1 clause 1 no. 2 Federal Mining Act (Bundesberggesetz, hereinafter referred to as BBergG) is required with regard to the regulation of the use and exploitation of the waters above the continental shelf and the air space above these waters. An environmental assessment was submitted to the responsible authority and a public consultation process was carried out within the scope of the permit procedure. Pursuant to §133 par. 1 clause 1 no. 2 BBergG, the Federal Maritime and Hydrographic Agency issued the permit on March 27th 2018.

A Mining Law permit with regard to the technical assessment of the planned pipeline is required pursuant to §133 par. 1 clause 1 no. 1 BBergG. This permit granting procedure did not require public consultation. The Mining Authority issued the permit on November 2nd 2017 for construction and on March 16th 2018 for operation.

Concentrated procedure. The permit applications were filed together in a concentrated procedure; that, is one permit application with supporting documentation (e.g. EIA). The permit application as well as support documents were publicly accessible and were sent to specific stakeholders such as government authorities and environmental NGOs. Thus, there was a single public consultation procedure and public hearing relating to the ‘concentrated’ permit application procedure. However, the responsible authorities took separate permit decisions. The permit decisions involve conditions relevant for further stakeholder engagement.

2.2 Requirements of International Conventions

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 is proposed to run broadly in parallel to all the national EIA procedures.

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 recognised 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, minimise; 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 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 key potential socio-economic and environmental issues associated with the preferable Project route have been identified through the assessments undertaken to date, including the Impact Assessments of the Permit Application and the Social Impact Assessment.

3.1 Communities health, safety and security

The local communities comprise mostly villages and small towns with a maximum of 9,560 inhabitants.

The local emergency infrastructure is adequate to deal with reasonably foreseeable emergency situations, such as fire, at Lubmin during the construction and operations phases of NSP2. To reach this conclusion, a complete assessment of the capacity of local medical infrastructure to accommodate the needs of personnel involved in the construction phase of the project was conducted in cooperation with the respective, responsible local authorities.

Community of Lubmin

The closest settlement to the PTA/landfall is Lubmin, which is located to the west at a distance of about 1 km. Other settlements within a 10 km radius of the Lubmin landfall are identified with their population sizes in Table 1.

Table 1: Population of communities within a 10 km radius of Lubmin (2015)

Community	Population	Female	Male
Lubmin	2,120	1,097	1,023
Wusterhusen	1,158	573	585
Loissin	773	354	419
Brünzow	621	309	312
Kemnitz	1,105	547	558
Neu Boltenhagen	610	297	313
Rubenow	791	391	400
Kröslin	1,807	908	899
Peenemünde	249	102	147
TOTAL	9,234	4,578	4,656

The nearest hospital, with emergency care, is located 19.6 km from the landfall, the nearest rescue helicopter is situated in Greifswald and the nearest rescue station at a distance of approx. 5 km. The volunteer fire brigade Lubmin is responsible for emergencies at the landfall, an object-related operational plan is available as part of the operational alarm/hazard prevention plan and special protection plan of the administrative district Western Pomerania Greifswald.

The project will rely on local road infrastructure for both the daily transport of construction personnel between their accommodation and work sites and for the transfer of materials to and from the construction areas.

3.2 Landowners

All land required in Lubmin is in designated industrial areas and no resettlement of people was required.

The landfall and gas receiving station of the Nord Stream 2 pipeline in Lubmin will be located southwest of the industrial harbour Lubmin. This area is reserved for industrial development with higher space requirements.

3.3 Compensation Measures

NSP2 is obliged to provide compensation measures for the unavoidable interference caused by construction and operation of the pipeline in the German route section by legislation. Because most of the interference caused by construction and operation of the pipeline occurs in the

Greifswalder Bodden, the compensation accordingly benefits this area. A total of more than 20 compensation options in the entire area of the Greifswald Bodden were intensively examined by internal and external environmental experts. From the measures proposed to the Bergamt Stralsund, the measures Fischlandwiesen, Polder Bargischoh and the upgrade of the wastewater treatment plants Stralsund and Greifswald were approved.

3.4 Tourism and Ecosystem services

Reactional activities exist in the area around Lubmin. This includes holiday accommodation, beach usage, sailing, kite surfing and fishing out of Lubmin and other marinas.

The Marina Lubmin is situated next to the industrial harbour. It has 180 berths and provides an ideal access to the sailing area Greifswalder Bodden, around Rügen and Usedom. Sailing and camping activities that can be performed without restrictions during the entire construction phase of NSP2 as their access to the sea will remain available. A kitesurfing school (“Ostsee Kiteschule”) is occasionally located in Lubmin Marina that uses the beach access in the landfall area. The beach is used for walks and bathing. Tourists and residents reportedly use the quay area of Lubmin harbour to fish. Lubmin Marina is connected to the community of Lubmin via two paths running through the dune forests and along the shore, which is used by residents and tourists. As a micro-tunnel will be built for the nearshore and beach-crossing section, there will be no land and very limited marine access restrictions for recreational activities. The access to the marina, beach, camping, and kitesurfing school via Freesendorfer Weg will remain available at all times during the construction phases. Hunting and collection of forest products are not taking place within the project study area. Due to industrial and recreational activities related noise, the game has moved in the forest south of the NSP2 site.

The islands of Usedom and Rügen are important to tourism in Mecklenburg-Western Pomerania. Rügen is the closest island to the NSP2 landfall and nearshore area. Visiting beaches and scenic coastlines, and water-based activities such as swimming, kitesurfing, boating, and fishing, are popular with tourists visiting Rügen. The National Park Jasmund, the Southeast Rügen Biosphere Reserve, and the Vorpommersche Boddenland National Park are some of the most popular tourist attractions. With 22 yacht harbours on the island of Rügen, boating is a key coastal activity closely followed by recreational fishing and swimming. The waters around Rügen are popular with boats and anglers during the summer months.

3.5 Fisheries

The nearest fishing port to Lubmin landfall is located at Freest, approximately 5 km to the east of the landfall. According to 2010 data, it is managed as a cooperative with 81 member companies in total. 28 out of them are fishing companies which operate 54 vessels (mostly smaller vessels with a maximum length of 18 m). Other fishermen are also allowed to use the facilities and sell their fish at Freest Harbour.

The fishing regions of the Greifswalder Bodden as well as along the outer coast of Rügen are of importance for German fishing, especially for their herring catch. German bottom trawl fishery is primarily targets cod and occasionally flounder and plaice, but is a mixed fishery with considerable bycatches of other flatfish species such as dab, turbot and brill. German gillnet fisheries target cod and a variety of flatfish species.

Compensation agreements are made with subordinate fishery associations. Associations are required to cover individual fishermen in their agreement.

3.6 Biodiversity

The pipeline route is close to or crosses 8 Natura 2000 sites (5 Special Conservation Areas and 3 Special Protection Areas). Key species include grey seal, common seal, harbour porpoise, otter, lamprey, shad, sturgeon and over 50 bird species of special importance). Key habitats include sandbanks, coastal lagoons, large shallow inlets and bays, reefs, embryonic shifting dunes and vegetated cliffs). Impacts arise from underwater construction activities including physical disturbance of the seabed, release of sedimentation generation of underwater noise and light emissions from vessels. All potential environmental impacts are assessed in the permit application documents and have been distributed for public display.

3.7 Cultural heritage

Cultural heritage objects, such as shipwrecks, have been identified in proximity to the offshore pipeline route in the German sector. Mitigation procedures for such objects are made in consultations with the national authorities. A chance finds procedure is used to manage the identification and preservation of cultural heritage chance finds.

3.8 Marine infrastructure and Military activities

The Project pipeline routes will cross 7 shipping routes in the German EEZ/Territorial Waters.

A number of existing and planned infrastructure facilities are located in the German EEZ and TW and appropriate management and consultation with these third party operators will be required to avoid impacts. Relevant identified infrastructure include:

- The Project pipelines will cross up to nine existing/planned cables operated by 50Hertz offshore GmbH.
- The Project pipeline route traverses an existing cable associated with the OWP Wikinger and Arkona-Becken Südost wind farms that lie to the north-west of the Nord Stream 2 Pipeline route.

The Project route passes through military exercise areas in the German EEZ and Territorial Waters around the island of Rügen. The military practice areas include a Target Practice Area and two Artillery Firing Areas.

3.9 Transboundary aspects

The project will be constructed in the vicinity of Germany's national border with Denmark, Sweden and Poland. The affected countries will be consulted as part of the German permitting and/or Espoo process.

4 Identification of Stakeholders

4.1 Overview

German Legislative Requirements. Stakeholder identification is an integral part of the official permit procedure by German authorities. As defined by German legislation, the authorities identify and invite stakeholders to express their comments and opinions on a project's potential impacts. Under this legislation stakeholders are defined as "any individual or group affected by the project and named by German authorities to represent public interests in the procedure"¹.

IFC performance standards requirements. In addition to the authority-led stakeholder identification, the Company is undertaking a supplemental process of identification of the stakeholders whereby stakeholders are identified as individuals, groups, or organizations 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 further subdivided into international, state (federal), regional, and local stakeholders.

- **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 influencing the Project in any way.
- **Parties that may be 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 the affected parties consist of Finland, Estonia, Latvia, Lithuania, Poland, Sweden, Denmark, and Russia.

¹ Definition based on German law: (German: Träger Öffentlicher Belange – TöB): Authorities and other autonomous bodies, which are in charge of asserting and / or enforcing a public interest based on a legal foundation, and which bear the main responsibility for this interest (Source: Ziekow, Siegel – 2001)

Stakeholder identification has been made through consideration of the potential stakeholder relevant to each of the key Project socio-economic and environmental issues described in section 3. Stakeholders are identified through consideration of both groups/individuals that may be influenced by the Project and those that may influence the Project.

The additional stakeholder identification process is based on the available environmental and social risk assessment results and currently available socio-economic data. The stakeholder list will be 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 summarised in Attachment 2. Key specific representatives of each stakeholder category are also provided in Attachment 2. Further elaboration of and background to the identification of Affected Groups is described in turn below.

4.2 Affected Stakeholders

The following groups of affected stakeholders have been identified:

- Land owner
- Cable owners
- Ecosystem services users, incl. fisheries
- Local communities
- Local authorities
- Commercial enterprises

Affected communities, incl. Lubmin and other surrounding town's citizens, visitors of beach and marina, will be informed on the project by the authorities and additional communication lines, incl. authorities' and company web-site.

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

Table 2 Identification of Affected Stakeholders

Socio-economic / environmental aspect	Affected Stakeholders
Landowners for the Project and Compensation Measures	EWN Entsorgungswerk für Nuklearanlagen GmbH
Community Health, Safety, Security	<p>Local authorities:</p> <ul style="list-style-type: none"> • Office of Roads Neustrelitz (Straßenbauamt Neustrelitz) • Office of Roads Stralsund (Straßenbauamt Stralsund) • Office for Spatial Planning and Landplanning West Pomerania (Amt für Raumordnung und Landesplanung Vorpommern)

Socio-economic / environmental aspect	Affected Stakeholders
	<ul style="list-style-type: none"> Office for Health and Social M-V (Landesamt für Gesundheit und Soziales M-V) Ministry for Economy, Labour and Health (Ministerium für Wirtschaft, Arbeit und Gesundheit) Ministry of Energy, Infrastructure and Digital, MV (Ministerium für Energie, Infrastruktur und Digitalisierung M- V) <p>Local communities as identified in section 3.1.</p> <p>Administration offices:</p> <ul style="list-style-type: none"> Amt Bergen auf Rügen Amt Lubmin Amt Usedom-Nord Ostseebad Binz Stadt Sassnitz Amt Mönchgut-Granitz Amt Anklam-Land Stadt Putbus <p>Commercial enterprise:</p> <ul style="list-style-type: none"> GASCADE Gastransport GmbH
Ecosystem services access and Fisheries	<p>Tourism</p> <ul style="list-style-type: none"> Marina Lubmin GmbH Tourist offices (Lubmin, Usedom-Nord, Bergen auf Rügen, Mukran, Sassnitz, Binz). Through tourist offices following Stakeholders could be approached: <ul style="list-style-type: none"> Local hoteliers / accommodation providers around Lubmin Marine area users, such as Ostsee Kiteschule <p>Fisheries</p> <ul style="list-style-type: none"> German Fishing Association (Deutscher Fischerei Verband e.V.) State Association of the Cutter and Coastal Fishers in Mecklenburg-Western Pomerania (Landesverband der Kutter und Küstenfischer M-V e.V.) Office for Agriculture, Food Safety and Fishing (Landesamt für Landwirtschaft, Lebensmittelsicherheit und Fischerei)

Socio-economic / environmental aspect	Affected Stakeholders
	<ul style="list-style-type: none"> State Association of the Hobby Fishermen (Landesanglerverband M-V e.V.) <p>Authority</p> <ul style="list-style-type: none"> State Forest Mecklenburg-West Pomerania (Landesforst Mecklenburg-Vorpommern) <p>Local communities as identified in section 3.1.</p>
Biodiversity	<p>Authority:</p> <ul style="list-style-type: none"> Board for the Environment and Nature West Pomerania (Staatliches Amt für Umwelt und Natur Vorpommern) Board for the Environment and Nature Middle Mecklenburg (Staatliches Amt für Umwelt und Natur Mittleres Mecklenburg) State Forest Mecklenburg-West Pomerania (Landesforst Mecklenburg-Vorpommern) Office for the Environment, Nature Conservation and Geology Mecklenburg-West Pomerania (Landesamt für Naturschutz und Geologie M-V) Administrative district of Vorpommern-Rügen (Landkreis Vorpommern-Rügen) Administrative District Vorpommern-Greifswald (Landkreis Vorpommern-Greifswald) <p>NGO:</p> <ul style="list-style-type: none"> Water and Soil Association Rügen (Wasser- und Bodenverband "Rügen") Farmers Association (Bauernverband Mecklenburg-Vorpommern) Farmers Association Rügen (Bauernverband Rügen)
Cultural heritage	<p>Authority</p> <ul style="list-style-type: none"> Office for Culture and Care of Monuments Mecklenburg-West Pomerania (Landesamt für Kultur und Denkmalpflege Mecklenburg-Vorpommern, LaKD)
Infrastructure and Military activities	<p>Authority:</p> <ul style="list-style-type: none"> General Directorate for Waterways and Shipping Water and Shipping Authority Stralsund, Office for Central Duties and Technology of the Police, Fire and Catastrophe Protection Mecklenburg-West Pomerania, incl.

Socio-economic / environmental aspect	Affected Stakeholders
	<p>Munition rescue service (Landesamt für zentrale Aufgaben und Technik der Polizei, Brand- und Katastrophenschutz)</p> <ul style="list-style-type: none"> Federal Office for transportation (Eisenbahnbundesamt) Marinekommando Federal Office for Infrastructure, Nature Protection and Services of the Armed Forces (Bundesamt für Infrastruktur, Umweltschutz und Dienstleistung der Bundeswehr) <p>NGOs:</p> <ul style="list-style-type: none"> Marina Lubmin GmbH Deutscher Motoryachtverband e.V. German Sailor Association (Deutscher Segler-Verband) Association of German Shipowners (Verband Deutscher Reeder) <p>Commercial enterprise</p> <ul style="list-style-type: none"> Gascade 50Hertz Transmissions GmbH, Netzbetrieb German Telekom - Sea Cables (Deutsche Telekom – Seekabel) E.ON Climate & Renewables CE GmbH Iberdrola Renovables Offshore Germany GmbH

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. Based on the socio-economic impact assessment conducted in the tourist season, 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.

During the social impact assessment around the landfall no concerns have been raised that vulnerable people or groups are affected by NSP2 in the project study area. In addition, NSP2 has ensured proper information of the public also beyond the meetings via press releases and media briefings.

4.3 Interested parties

Interested parties include groups that are not directly affected by the Project, including the following (see Attachment 2 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 wellbeing 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

- Federal Maritime and Hydrographic Agency (Bundesamt für Seeschifffahrt und Hydrographie, BSH)

State Authorities

- Stralsund Mining Authority

Other authorities will be informed and consulted on Project matters as appropriate following legislative requirements and via informal consultation.

- Convention Officials: Espoo convention focal point representatives, HELCOM representatives; affected countries representatives in Espoo conventions.
 - Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (Bundesministerium für Umwelt, Naturschutz, Bau und Reaktorsicherheit, BMUB)
- Public organizations:
 - Regional, national and international non-governmental organisations aimed at protecting environmental, social and economic interests of the population.
 - Cultural organizations; scientific and research organizations and laboratories, and educational institutions: schools, universities, academies;
 - 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.

Table 4 Identification of Interested parties

Socio-economic / environmental aspect	Interested parties
Biodiversity and Environment	<p>Permitting authorities</p> <p>Other interested authorities:</p> <ul style="list-style-type: none"> • Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety • Federal Office for the environment (Umweltbundesamt) • Federal Net Agency (Bundesnetzagentur) • Federal Office for Nature Protection (Bundesministerium für Umwelt, Naturschutz und Reaktorsicherheit) • Federal Office for Agriculture and Food (Bundesanstalt für Landwirtschaft und Ernährung) <p>NGOs:</p> <ul style="list-style-type: none"> • WWF Germany, • German Federation for Environment and Nature Conservation (Bund für Umwelt und Naturschutz Deutschland BUND Deutschland e.V.), Nature Conservation Union Germany (Naturschutz Bund, NABU Deutschland e.V.), • WDCCS Whale and Dolphin Conservation Society • NABU Deutschland e.V. • BUND Deutschland e.V. <p>Cultural organizations:</p> <ul style="list-style-type: none"> • Leibnitz-Institut für Ostseeforschung Warnemünde
Ecosystem services	<p>Authorities</p> <ul style="list-style-type: none"> • Ministry of Agriculture and the Environment (Ministerium für Landwirtschaft und Umwelt M-V) • City of Greifswald <p>Cultural organisation:</p> <ul style="list-style-type: none"> • Johann Heinrich von Thünen Institute, Federal Research Institute for Rural Areas, Forestry and Fisheries

Socio-economic / environmental aspect	Interested parties
	<ul style="list-style-type: none"> Leibniz-Institut für Ostseeforschung Warnemünde
Infrastructure and Military activities	<p>Authorities</p> <ul style="list-style-type: none"> Federal Ministry of Traffic and digital Infrastructure (Bundesministerium für Verkehr und digitale Infrastruktur) Federal Ministry for Economy and Energy (Bundesministerium für Wirtschaft und Energie) <p>Social NGOs</p> <ul style="list-style-type: none"> Federal Association Wind Energy (Bundesverband Windenergie e.V.) Offshore Forum Windenergie GbR
Transboundary impacts	<ul style="list-style-type: none"> Espoo convention focal point <ul style="list-style-type: none"> Danish and Polish Authorities and Public Helsinki Commission, Executive Secretary Authority: Federal Foreign Office

5 Stakeholder Engagement Activities Undertaken to Date

National EIA and Espoo consultations. During the planning of the project an intensive dialogue with stakeholders occurred. While compiling the permit application, the Company held meetings with stakeholders and exchanged relevant information to align Project planning and stakeholder requirements. Since the EIA scoping conference in 2013, comprehensive stakeholder meetings with authorities, public agencies, communities and other interested parties have taken place. The stakeholder consultation was accompanied by communication and public information activities, such as press releases, media briefings, roundtables and events. In addition, stakeholders were invited to express their comments in person during the public hearing conference that took place in Stralsund in July 2017. During the hearing, the Company presented the Project and answered questions raised. After the public hearing and during construction activities, the company has carried out dozens of informal consultations with authorities, NGOs, ecosystem services users and cultural organisations.

HELCOM consultation. NSP2 provided information on the project during the 52nd and 53rd meetings of the Heads of Delegation. The information is included in HELCOM materials available on the web-site www.helcom.fi

Fishermen. Negotiations to reach the agreement 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 the agreement with cable owners were carried out by NSP2. Permanent contacts were established and will be maintained during the project execution.

Construction. Notifications and daily reports are sent to the authorities on a regular basis (daily and monthly) as defined in the permits. A fishery coordinator ensures daily information of the fishermen about the construction activities. A marine coordination centre (MCC) coordinates the daily work. Furthermore, informational handouts and signs to mariners and marine area users were distributed in Lubmin and the area. As required in the permits, regular meetings are taking place with affected stakeholders in the Lubmin industrial area.

5.1 Issues raised

During the EIA scoping phase at the beginning of the permitting procedure (2013) and the public consultation after the submission of the permit application (April to May 2017), the two responsible German authorities (the Stralsund Mining Authority and the Federal Maritime and Hydrographic Agency), invited stakeholders to express their views and comments.

During the permitting procedure, comments received related to the following areas of interest:

- Fishery
- Cultural heritage preservation
- Nature protection
- Marine traffic
- Tourism
- Emissions
- Alternative infrastructure.

The results of stakeholder engagement to date have been used to inform the environmental and social impact assessment developed as part of the permit application and support documents following national requirements, and have been taken into account in decisions on Project design and in terms of locations for specific Project components. Furthermore, the responsible authorities consider all concerns raised for issuing the construction permits.

6 Engagement Plan

The Company's approach to stakeholder engagement is guided by German law, international requirements and Company policy as described in section 2.

This section contains a description of current approach to stakeholder engagement and information disclosure processes available at the moment.

6.1 Means of Engagement

The main mechanisms of information disclosure and stakeholder consultation are presented below. This section describes the means of engagement that could be potentially used in the context of the Project. The program presented in section 6.3 identifies methods that are actually planned at this stage.

Information distribution. Announcements about important events, which are organized by the Company, and also other needed information will be circulated and published as follows:

- Announcements published in mass media: federal, regional, local newspapers.
- Printed announcements, posted for local communities, give-aways
- Hard copies of permit documentation in public liaison offices and download link on authorities' websites during public consultation
- Letters exchange
- Brief information
- Web-site
 - General, as well as specific project information is published on a company's homepage.
 - Permit application and Espoo report
 - Notifications are published on the company's homepage.

<https://www.nord-stream2.com/permitting-germany/>

The planning documents (Permit application and Espoo report) were accessible from the beginning of the public display, as of 18.04.2017, on the webpages of the Stralsund Mining Authority (www.bergamt-mv.de, Service, Licensing Procedure) and of the Federal Maritime and Hydrographic Agency (www.bsh.de, in the "Public Notice" section) as well; the content of the documents made available for inspection is however authoritative.

- Social media

Project relevant information is 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 liaison offices. The public liaison offices were opened by the responsible Authorities to share Project documents at public places. The visitors of the offices could comfortably review the Project materials and provide their feedback to the Stralsund Mining Authority and the Federal Maritime and Hydrographic Agency. The public liaison offices were opened within the EIA procedure in the agreement with local authorities for the public display of the permitting documents.

Targeted informing and consulting. It is implemented through direct contacts with representatives of stakeholders or by using the telephone and online communication tools. Established contacts with representatives of the authorities, leaders of local communities and land owners, NGOs will be used in the targeted informing procedures.

Public hearing. The public hearing were held according to the national and international requirements at the EIA and permitting phase, by the Administration. This is a face-to-face event,

i.e. a meeting of representatives of the Project and design documentation and EIA developers with stakeholders. The public hearing took place between July 17th and July 21st in Stralsund.

Meetings. The meetings are held 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

Associated facilities joint participation in public activities will be coordinated with Gascade within the framework of associated facilities impacts assessment, relevant stakeholder engagement and environmental and social management.

Workshops, forums and conferences. The Project considers conferences as an important platform bring together various stakeholders and as powerful tools for sharing ideas, building consensus and developing commitment. The Project will participate and support research workshops, forums and conferences. Thematic workshops can be organised around a specific topic of broad interest.

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 will be examined to ensure for the representatives of stakeholders safe visits to the sites of the Project and its contractors. Site visits to the Nord Stream landfalls can be organised for small groups of stakeholders.

6.2 Information Disclosure

Table 5 presents an overall information disclosure plan.

Table 5 Information disclosure plan

Information topic	Information materials	Means of disclosure	Stakeholders	Timetable
General Project information	Leaflet Presentation Communication materials	Meetings Web-site	All stakeholders	On-going
Permitting application documents, incl. Environmental Impact Studies	Reports Non-technical summary EIA	Public liaison offices Web-site: NSP2, Authorities	All stakeholders	Q1 2017

	Maps and drawings	Mail by post to all stakeholder according to German law		
Transboundary impact assessment under Espoo convention	Espoo report Non-technical summary Map atlas	Public liaison offices Web-site: NSP2, Authorities Mail by post to all stakeholder according to German law	All stakeholders	Q1 2017
Public hearing	Presentation, Permit application	Minutes of Meeting	All stakeholders	Q2 2017
Concretions of permit application	Reports	Public liaison offices Web-site: NSP2, Authorities Mail by post to all stakeholder according to German law	All affected stakeholders	Q4 2017
Permit	Documentation	Distribution to stakeholders and public display of permits public liaison offices	All stakeholders	Q1 2018
Information on Project execution and progress	Information points at Landfall and in Public Liaison Office	Leaflets Brochures	All stakeholders	Q1 2018 – Q3 2019
	Notifications	Media Web-site Direct contacts	Affected stakeholders Authorities	Q1 2018 – Q3 2019
	Leaflets	Hard copies distribution	Affected stakeholders	Q1 2018 – Q3 2019

	Reports on Project progress and performance	Distribution stakeholders to	Affected stakeholders Authorities	Q1 2018 – Q3 2019
Information on monitoring	Reports	Distribution stakeholders to	Affected stakeholders Authorities	Q1 2018 – Q3 2019

6.3 Stakeholder Engagement Programme

An overview of the planned stakeholder engagement activities with breakdown by stakeholder group and Project phase is given Table 7 below. This table will be updated through the life cycle of the Project. Where reasonably possible engagement activities will be joint for different objectives.

Table 6 Stakeholder Engagement Programme

Stakeholder/Stakeholder Category	Engagement topics	Stakeholder Engagement and Methods	Indicative Timing	Responsibility	Key Actions/Disclosed Information	Location/Engagement Outputs
Environmental and Social Impact Assessment						
Affected Stakeholders	Environmental and Social Impact Assessment Compensation measures	Target informing Meeting Public hearing One-to-one meetings	Q3 2016 – Q4 2017	Nord Stream 2 AG	General project information Presentation Environmental reports	Mecklenburg-West Pomerania / Agreement
Permitting phase						
Affected Stakeholders	Compensation measures	One-to-one meetings Group meetings	Q1 2018	Nord Stream 2 AG	Letter Project Brochure (or equivalent)	Lubmin / Agreement
German Fishery Associations	Compensation agreements	One-to-one meetings Group meetings	Q4 2017	Nord Stream 2 AG	Letter EIA Non-Technical Summary	Rügen and Lubmin / Agreements
Cable owners	Crossing agreement	Target informing One-to-one meetings	Q1 2018	Nord Stream 2 AG	Letter Project Brochure (or equivalent)	Berlin / Agreement
Affected stakeholders, nominated according to German Legislative Requirements	Permit	Information disclosure	Q1 2018	Stralsund Mining Agency and Federal Maritime and Hydrographic Agency	Permit documentation	All Stakeholders in Germany / Permit
Construction phase						
All stakeholders	Notification of Start of Construction	Information distribution	Q1 2018	Nord Stream 2 AG	Notification Press release	Press release

Stakeholder/Stakeholder Category	Engagement topics	Stakeholder Engagement and Methods	Indicative Timing	Responsibility	Key Actions/Disclosed Information	Location/Engagement Outputs
Authorities	Project progress Construction activities	Information distribution Target informing Meetings	Q1 2018 – Q3 2019	Nord Stream 2 AG	Announcements Notification Reports	Lubmin / minutes
Authorities	Environmental monitoring Biodiversity conservation	Information distribution Target informing Meetings	Q1 2018 – Q3 2019	Nord Stream 2 AG	Announcements Notification Reports	Lubmin / minutes
Affected stakeholders	Implementation of Compensation Measures	Information distribution Target informing Meetings	Q1 2018 – Q3 2019	Nord Stream 2 AG	Notification Reports Grievance mechanism	Area of influence / minutes
All stakeholders	Project progress	Information distribution	Q1 2018 – Q3 2019	Nord Stream 2 AG	Grievance mechanism	Tbc / minutes
Operational phase						
Authorities	Environmental monitoring	Reporting	Q1 2019 – Q4 2022	Nord Stream 2 AG	Notification Reports	tbc
All Stakeholders	Regular consultations	Information distribution	Q1 2019 – tbc.	Nord Stream 2 AG	General project information Grievance mechanism	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.

7.1 Means of Receiving Stakeholder 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: Members of the public can directly contact the project via the following means:

Head office

- **Post:** Baarerstrasse 52, 6300 Zug, Switzerland
E-mail:
info@nord-stream2.com
press@nord-stream2.com
germany@nord-stream2.com
- **Telephone** number: available at the Project website <https://www.nord-stream2.com/>

Feedback communicated at meetings

All feedback provided by stakeholders during one to one meetings, roundtable meetings or community meetings will be recorded in minutes of the meeting.

Feedback / Statements from public consultation

Comments and feedback raised during the public consultation phase will be formally recorded by the leading authorities for consideration and submitted to Nord Stream 2.

7.2 EIA Feedback Management

Under the German regulatory public consultation, stakeholders have the opportunity to officially file their comments in writing to the two responsible authorities. These authorities will collect and consider the comments, inform and invite stakeholders to the public hearing. The authorities are tasked by law with evaluating the information and comments and with taking account of the results of the environmental and technical assessments when deciding whether to approve a project.

The generic procedure for managing stakeholder engagement data under the German regulatory process is illustrated and described below in Figure 4.

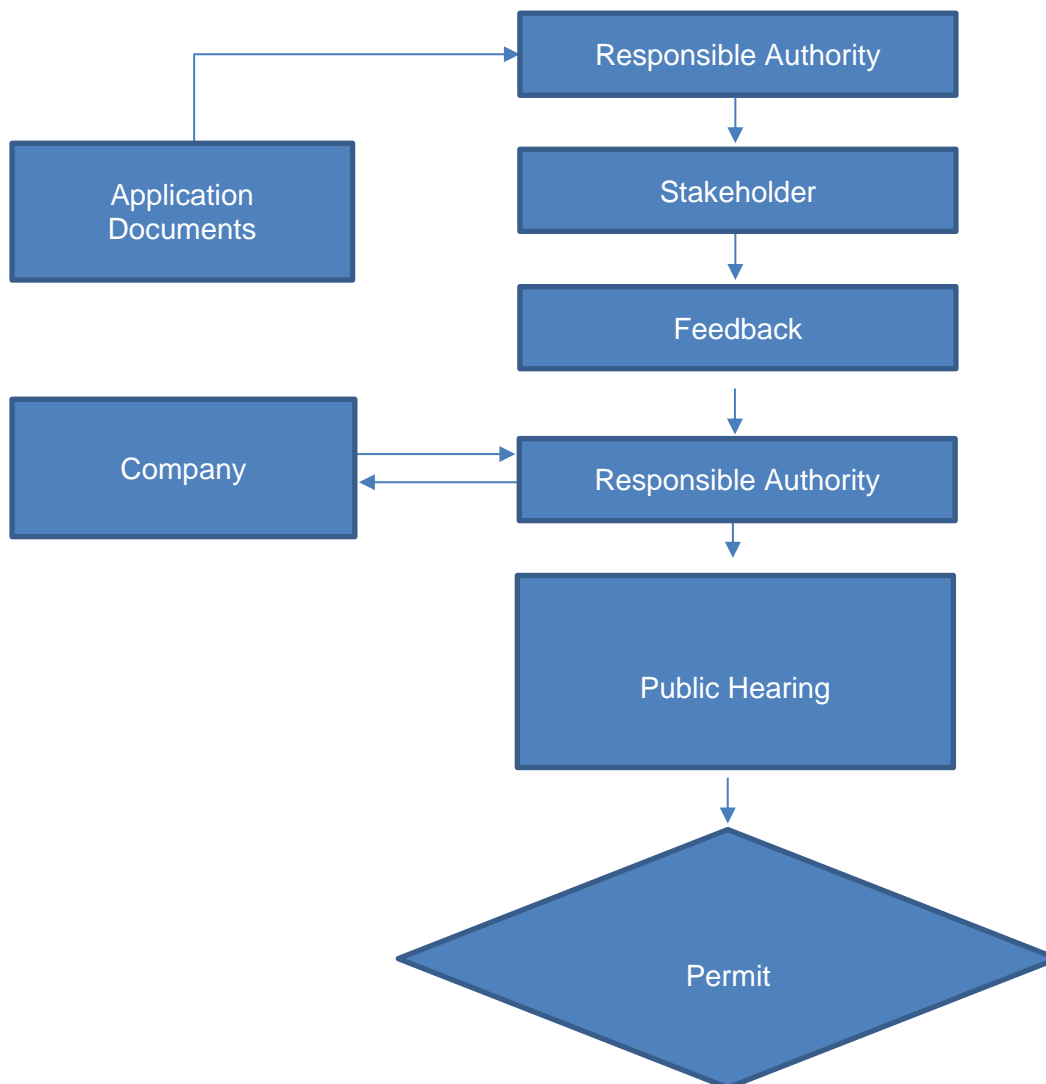


Figure 4 Stakeholder Engagement EIA Feedback Management Process

This mechanism will be related to permitting application only. Additionally, the comments will be stored in the Company's stakeholder engagement database and tracked, to ensure that all relevant feedback is included in the permitting procedure, documentation and project.

7.3 Espoo feedback management

The authorities in Germany will undertake a consolidated engagement procedure during the international permitting process following the Espoo convention procedure. Formal comments on the permit application will also be submitted directly to the respective authorities, and subsequently communicated to the Company.

7.4 Grievance Mechanism

A Grievance Mechanism is established to receive and facilitate resolution of external stakeholder grievances concerning the Project². 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.

Grievance mechanism is established besides the permitting process. The Company Grievance Mechanism does not replace, and does not affect the rights of any parties to use, the authority-led 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:

- Minimise 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 Company's respect for the interests of external stakeholders.

Key principles of the grievance management process are:

- Any person, group or organisation can submit a 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.

² A separate workers' grievance mechanism is being developed for the Project.

- 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 9 and described below.

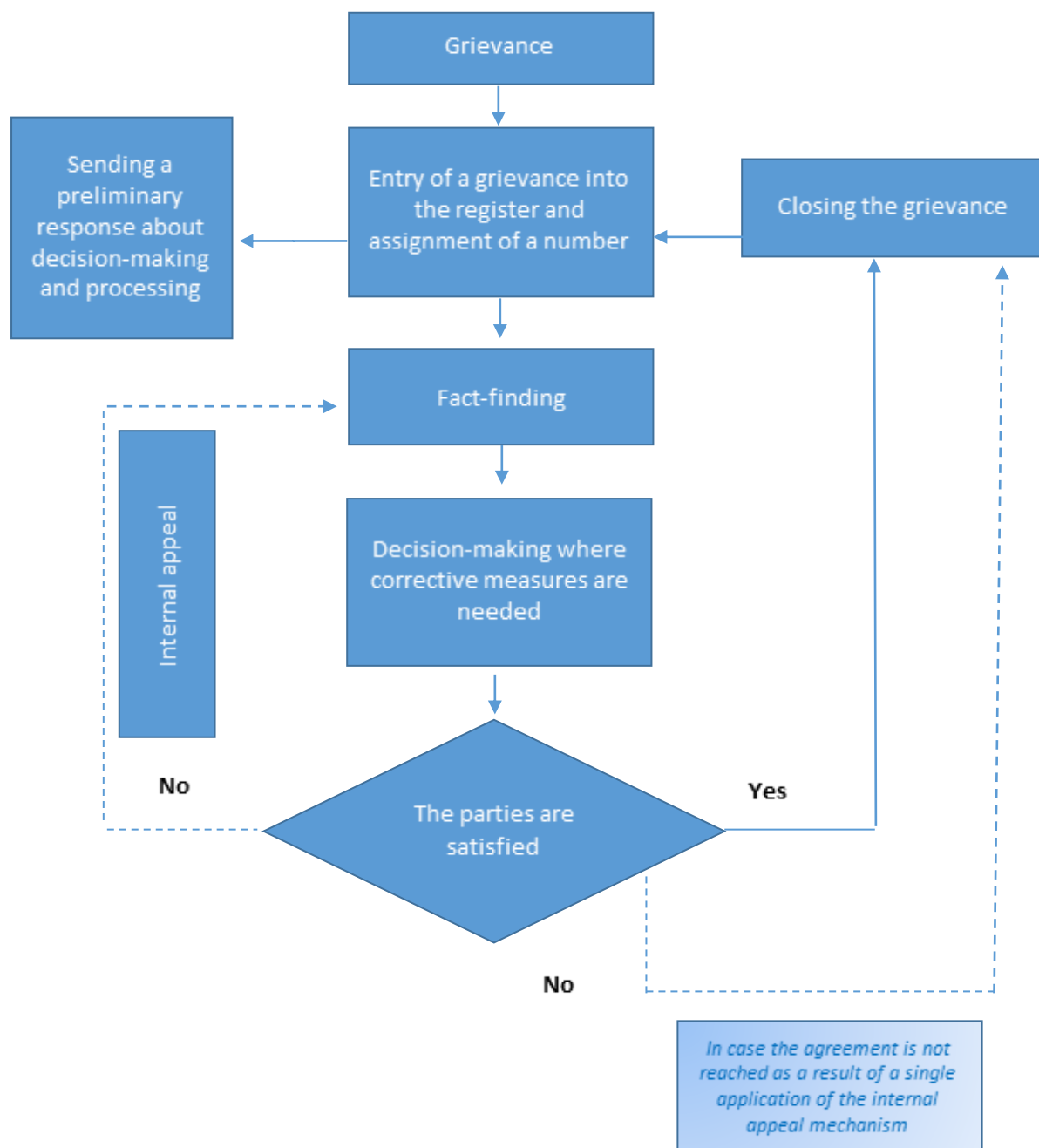


Figure 9 Grievance investigation flowchart

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). All grievances will be logged.

Stage 2: Acceptance of grievance for investigation

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

Stage 3: Notification

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

On a country level, the German SEP is being implemented by the German Permitting Department.

Engagement with affected Stakeholders is managed from the Head Office.

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 managers, HSE experts and specialists who are responsible for the management system.

The German 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, Company will ensure that an updated German 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 German 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 German 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 Stakeholder Engagement Plan;
- monitoring consultation activities conducted with government authorities and non-governmental 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 Stakeholder Engagement Plan. 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.

10 Attachments

Attachment 1. Project Stakeholder List

Table A1: Stakeholders divided following their geographical distribution and interests	
International	
Stakeholders	Key representatives
Authority	Helsinki Commission, Executive Secretary
Authority	Environmental Protection Agency (Danish Authority)
Authority	General Directorate for Environmental Protection, (Polish Authority)
Authority	Regional Directorate for Environmental Protection in Szczecin
Authority	Ministry of Maritime Economy and Transport
Authority	Maritime Office in Szczecin
Authority	Inspectorate of Environmental Protection
Authority	Ministry of Foreign Affairs
Authority	Ministry of Economy
Scientific Organisation	University of Gdansk, Hel Marine Station
Scientific Organisation	National Marine Fisheries Research Institute
Commercial	ARKA Sp. z o.o. (Fishery company)
Commercial	Darłowska Grupa Producentów Ryb i Armatorów Łodzi Rybackich (Fishery company)
Commercial	Goleniowski (Fishery company)
Scientific Organisation	Institute of Oceanology of the Polish Academy of Sciences
Commercial	Szczecin and Swinoujście Seaports Authority
NGO	ClientEarth

Table A2: Stakeholders divided following their geographical distribution and interests	
Federal	
Stakeholders	Key representatives
Authority leading the procedure	Federal Maritime and Hydrographic Agency (Bundesamt für Seeschifffahrt und Hydrographie, BSH)
Authority	General Directorate for Waterways and Shipping (Generaldirektion Wasserstraßen und Schifffahrt, GDWS)
Authority	Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (Bundesministerium für Umwelt, Naturschutz, Bau und Reaktorsicherheit, BMUB)
Authority	Federal Ministry of Economics and Energy (Bundesministerium für Wirtschaft und Energie)
Authority	Federal Ministry of Transport, Building and Urban Development (Bundesministerium für Verkehr, Bau und Stadtentwicklung)
Authority	Federal Foreign Office (Auswärtiges Amt)
Authority	Federal Office for Infrastructure, Environmental Protection and Service of the German Armed Forces (Bundesamt für Infrastruktur, Umweltschutz und Dienstleistung der Bundeswehr)
Authority	Federal Net Agency (Bundesnetzagentur)
Authority	Federal Environmental Agency (Umweltbundesamt)
Authority	Marine Commando (Marinekommando)
Authority	Federal Agency for Nature Conservation (Bundesamt für Naturschutz, BfN)
Authority	Federal Office for Agriculture and Food (Bundesanstalt für Landwirtschaft und Ernährung, BLE)
Authority	Federal Railway Authority (Eisenbahnbundesamt)
Authority	Federal Office for Civil Defense and Disaster Management (Bundesamt für Bevölkerungsschutz und Katastrophenhilfe)
Commercial	GASCADE Gas Transport GmbH
Commercial	50Hertz Transmissions GmbH
Commercial	German Telekom - Sea Cables (Deutsche Telekom)
Commercial	E.ON Climate & Renewables CE GmbH

Commercial	Iberdrola Renovables Offshore Germany GmbH
Social NGO	German Fishery Association (Deutscher Fischerei-Verband e.V.)
Social NGO	German Motor Yacht Association (Deutscher Motoryachtverband e.V.)
Social NGO	German Sailor Association (Deutscher Segler-Verband)
Social NGO	Association of German Shipowners (Verband Deutscher Reeder)
Social NGO	Federal Association Wind Energy (Bundesverband Windenergie e.V.)
Social NGO	Offshore Forum Windenergie GbR
Environmental NGO	German Federation for Environment and Nature Conservation (Bund für Umwelt und Naturschutz Deutschland BUND Deutschland e.V.)
Environmental NGO	Nature Conservation Union Germany (Naturschutz Bund, NABU Deutschland e.V.)
Environmental NGO	WDCS Whale and Dolphin Conservation Society
Environmental NGO	WWF Deutschland, Fachbereich Meere und Küsten, Projektbüro Ostsee
Scientific Organisation	Leibnitz-Institut für Ostseeforschung Warnemünde
Scientific Organisation	Johann Heinrich von Thünen Institute, Federal Research Institute for Rural Areas, Forestry and Fisheries (Thünen-Institut OF; Bundesforschungsinstitut für Ländliche Räume, Wald und Fischerei, Institut für Ostseefischerei)

Table A3: Stakeholders divided following their geographical distribution and interests	
State	
Stakeholders	Key representatives
Authority leading the procedure	Mining Authority Stralsund (Bergamt Stralsund)
Authority	Ministry for Energy, Infrastructure and Land Development Mecklenburg-West Pomerania (Ministerium für Energie, Infrastruktur und Digitalisierung Mecklenburg-Vorpommern)
Authority	Ministry of the Interior Mecklenburg-West Pomerania (Ministerium für Inneres und Europa Mecklenburg-Vorpommern)

Authority	Ministry for Agriculture, Environment and Consumer Protection Mecklenburg-West Pomerania (Ministerium für Landwirtschaft, Umwelt und Verbraucherschutz Mecklenburg-Vorpommern)
Authority	Ministry of Economics, Labour and Health Mecklenburg-West Pomerania (Ministerium für Wirtschaft, Arbeit und Gesundheit Mecklenburg-Vorpommern)
Authority	Office for Culture and Care of Monuments Mecklenburg-West Pomerania (Landesamt für Kultur und Denkmalpflege Mecklenburg-Vorpommern, LaKD)
Authority	State Forest Mecklenburg-West Pomerania (Landesforst Mecklenburg-Vorpommern)
Authority	Water and Shipping Authority Stralsund (Wasser- und Schifffahrtsamt Stralsund, WSV)
Authority	Office for the Environment, Nature Conservation and Geology Mecklenburg-West Pomerania (Landesamt für Umwelt, Naturschutz und Geologie Mecklenburg-Vorpommern, LUNG)
Authority	Office for Agriculture, Food Safety and Fishery Mecklenburg-West Pomerania (Landesamt für Landwirtschaft, Lebensmittelsicherheit und Fischerei, LALLF)
Authority	Office for Central Duties and Technology of the Police, Fire and Catastrophe Protection Mecklenburg-West Pomerania, incl. Munition rescue service (Landesamt für zentrale Aufgaben und Technik der Polizei, Brand- und Katastrophenschutz)
Authority	Office for Health and Social Affairs Mecklenburg-West Pomerania (Landesamt für Gesundheit und Soziales, LAGUS M-V)
Environmental NGO	Farmers Association (Bauernverband Mecklenburg-Vorpommern)
Environmental NGO	State Association of the Cutter and Coastal Fishers in Mecklenburg-Western Pomerania (Landesverband der Kutter und Küstenfischer M-V e.V.)

Table A4: Stakeholders divided following their geographical distribution and interests	
Regional / Local	
Stakeholders	Key representatives

Administrative District	Disrict of Vopommern-Greifswald (Landkreis Vorpommern-Greifswald)
Administrative District	Disrict of Vopommern-Rügen (Landkreis Vorpommern-Rügen)
Commercial	Kite shop Ostsee Kiteschule
Community	Amt Bergen auf Rügen (Gemeinden Buschvitz, Garz, Gustow, Stadt Bergen)
Community	Amt Lubmin
Community	Amt Usedom-Nord
Community	Ostseebad Binz
Community	Stadt Sassnitz
Community	Amt Anklam-Land
Community	Amt Mönchgut-Granitz (Gemeinden Middelhagen and Göhren)
Community	Stadt Putbus
Community	Universitäts- und Hansestadt Greifswald
Community	Hansestadt Stralsund
Authority	Office for Spatial Planning and Landplannin West Pomerania (Amt für Raumordnung und Landesplanung Vorpommern)
Authority	Office for Spatial Planning Greifswald (Amt für Raumordnung)
Authority	Board for the Environment and Nature West Pomerania (Staatliches Amt für Umwelt und Natur Vorpommern)
Authority	Board for the Environment and Nature Middle Mecklenburg (Staatliches Amt für Umwelt und Natur Mittleres Mecklenburg)
Authority	Office of Roads Neustrelitz (Straßenbauamt Neustrelitz)
Authority	Office of Roads Stralsund (Straßenbauamt Stralsund)
Authority	Nature Conservation Authority (Untere Naturschutzbehörde Landkreis Vorpommern-Greifswald)
	Office for Biosphere reservation Rügen (Biosphärenreservatsamt)
Social NGO / Commercial	Marina Lubmin GmbH
Environmental & Social NGO	State Association of the Hobby Fishermen (Landesanglerverband M-V e.V.)

Environmental & Social NGO	Brunst-Weber Foundation (Stiftung)
Environmental & Social NGO	Succow Foundation (Stiftung)
Environmental NGO	Farmers Association Rügen (Bauernverband Rügen)
Social NGO	Hunting Association Kasnevit (Jagdgenossenschaft Kasnevit)
Social NGO	Hunting Association Poseritz (Jagdgenossenschaft Poseritz)
Social NGO	Hunting Association Putbus (Jagdgenossenschaft Putbus)
Environmental NGO	Water and Soil Association Rügen (Wasser- und Bodenverband Rügen)
Environmental NGO	Association for water supply and waste water management (Zweckverband Wasserversorgung und Abwasserbehandlung Rügen)
Environmental NGO	Island Association (Insel e.V.)
Environmental NGO	Protection of Salmonidae and Water Mecklenburg-West Pomerania (Salmoniden und Gewässerschutz MV)
Landowner	Energiewerke Nord GmbH
Landowners / Farmers	List of private affected landowners and/or farmers