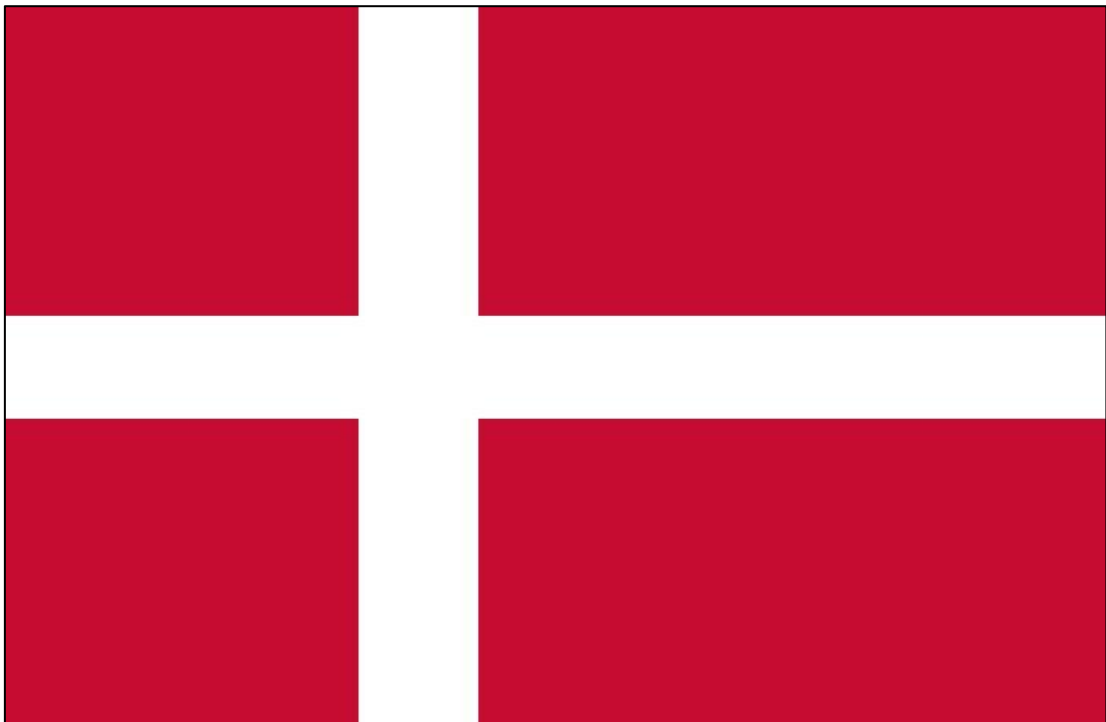


# Nord Stream 2

**Stakeholder Engagement Plan for Nord Stream 2 Project in Denmark**

**South-Eastern Route**



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## Abbreviations and Definitions

<b>Affected communities</b>	Local communities directly affected by the Project
<b>Contractor</b>	Any legal entity or physical person providing services to the Company
<b>Company</b>	Nord Stream 2 AG
<b>DP</b>	Dynamically Positioned
<b>Ecosystem services</b>	The benefits obtained by humans from functioning of natural systems
<b>EEZ</b>	Exclusive Economic Zone
<b>EIA</b>	Environmental Impact Assessment
<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>EU</b>	European Union
<b>HELCOM</b>	Helsinki Commission
<b>IFC</b>	International Finance Corporation
<b>NGO</b>	Non-governmental organization
<b>NSP2</b>	Nord Stream 2 Project
<b>NSP</b>	Nord Stream Project
<b>PS</b>	Performance Standard
<b>SEP</b>	Stakeholder Engagement Plan
<b>Stakeholders</b>	Individuals or groups of individuals, who may be influenced in the course of a project or who may influence the development of a project
<b>TSS</b>	Traffic Separation Scheme
<b>TW</b>	Territorial Waters

## 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> of natural gas per year. The Pipeline has a planned length of approximately 1,250 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 will be 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 AG 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 through the entire Project lifecycle. To reflect this evolving process, the SEPs “living” documents that will be updated as necessary throughout the Project lifecycle. The current version of the SEP was updated in Q3 of 2019 to address the ongoing permitting procedure for the NSP2 route in Denmark.

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

## Stakeholder Engagement in Denmark

This SEP applies to the Project components located within the jurisdiction of Denmark and covers the planning, construction and operation of the Project.

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 may consequently 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 such time.

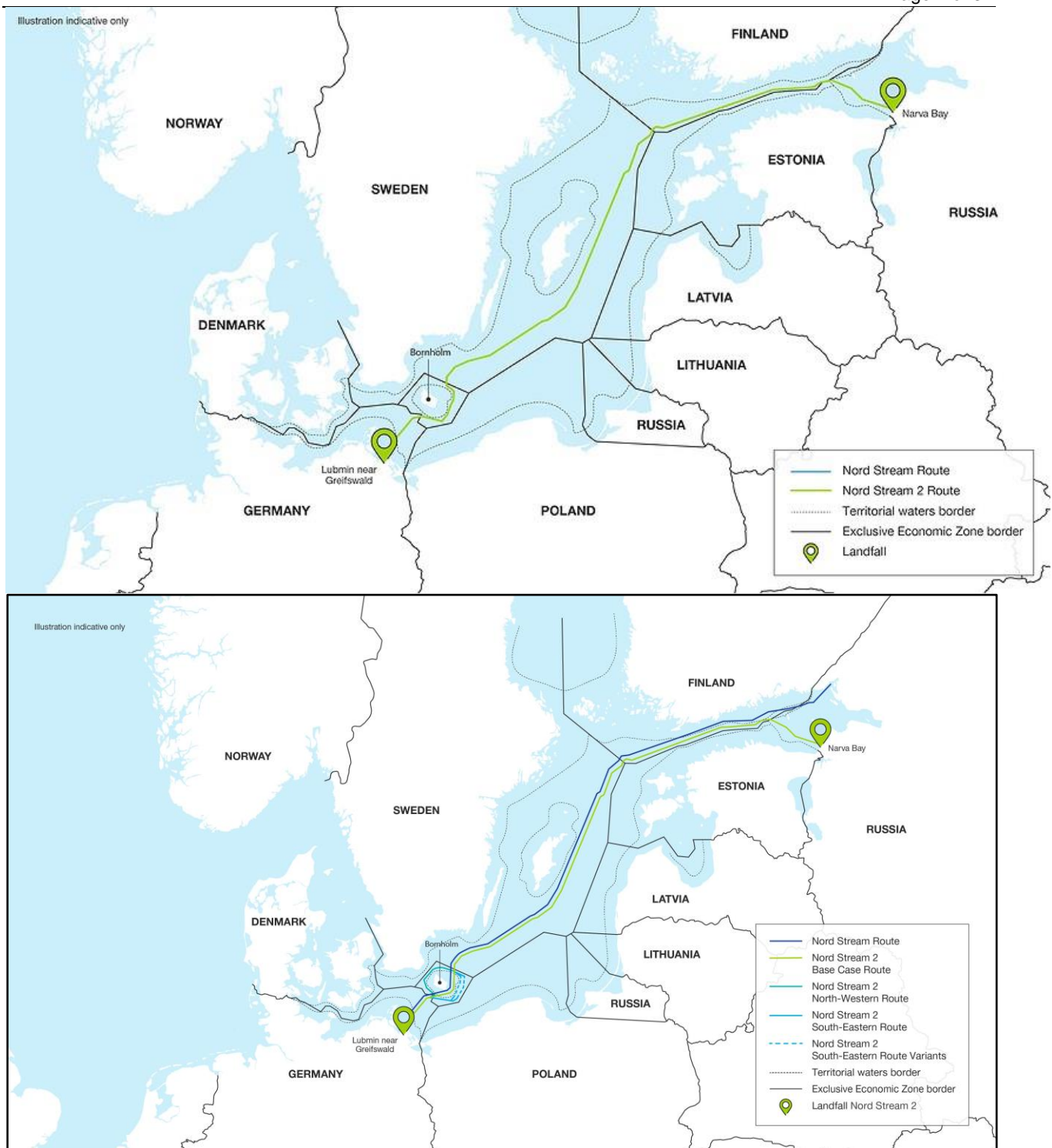
The structure of this Danish SEP is as follows:

- Section 1 contains a brief description of the Project within the Danish 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 manages 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 m<sup>3</sup> 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 Danish jurisdiction are described in Section 1.2 below for the South-Eastern route.

## 1.2 The Nord Stream 2 Project in Denmark

In Denmark the first application for the construction of the pipeline system in the Danish territorial waters (Base case route) was filed together with an EIA and the Espoo Report on 3 April 2017. This application went through the entire Danish permitting process, including a two-month national and international public consultation process in 2017. As Danish government gave no indication of coming to a decision regarding this route after more than two years from submission, Nord Stream 2 withdrew this application in June 2019.

Due to the amendment of the Continental Shelf Act (1 January 2018) and awaiting the Danish Ministry of Foreign Affairs' recommendation, which is pending since January 2018, Nord Stream 2 AG decided to explore alternative routes outside of Danish territorial waters.

On 10 August 2018, Nord Stream 2 submitted an application for construction together with an Environmental Impact Assessment (EIA) for an alternative route north-west of Bornholm (north-western route).

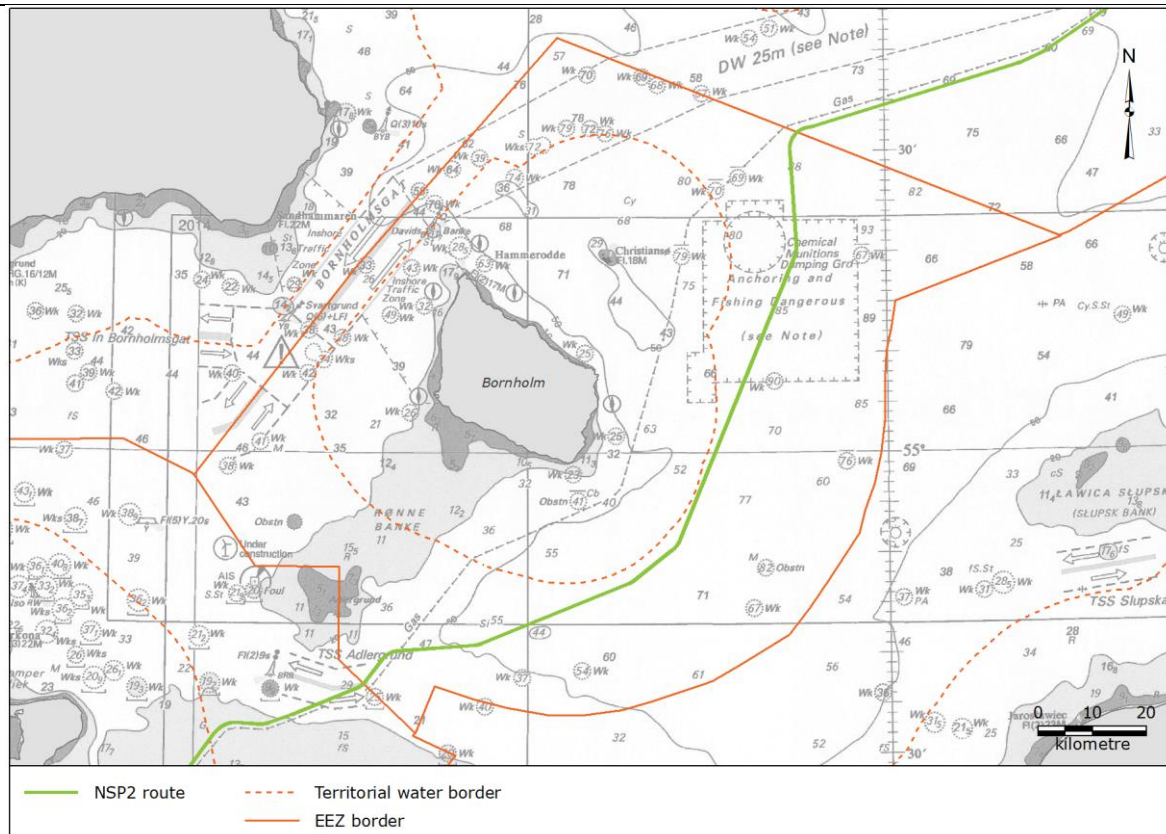
Denmark and Poland have since then resolved a long-standing border dispute over an area located south-east of Bornholm, making it available for Nord Stream 2 and other infrastructure projects. The Danish Energy Agency (DEA) ordered NSP2 to assess additional route alternative in this new available area.

An application for construction and an EIA for the alternative route south-east of Bornholm was thus filed on April 15, 2019 (South-Eastern Route). This application was granted a construction permit on October 30, 2019.

The length of the South-Eastern route is approximately 147 km through the Danish waters. The pipeline route runs solely through the Danish exclusive economic zone (EEZ). In the Danish section, the proposed NSP2 route runs south and east of Bornholm. Approximately 10 km from the Danish-German EEZ border the NSP2 route crosses the NSP pipelines and continues to Germany following the NSP route. At its closest point, the proposed pipeline route is approximately 23 km from Bornholm and more than 25 km from the Ertholmene archipelago.

Figure 2 provides an overview of the South-Eastern route in Denmark.





**Figure 2. Proposed NSP2 routing in Denmark**

The offshore pipelines are planned to be installed by multiple vessels working simultaneously along the Baltic Sea. Both dynamically positioned (DP) lay vessels and anchored lay vessels may be used, though it is currently planned to install the Danish section of the route by DP vessels. The pipe-lay will follow 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, other construction activities in the Danish EEZ will include (all of which are likely to require the set-up of temporary safety exclusion zones around the respective vessels):

- Rock placement for free span correction, cable crossings and pipeline crossings;
- Post-lay trenching and/or rock placement for stability of the pipeline in some sections; and
- Pipeline survey activities.

Temporary safety zones will be established around the above offshore construction activities with a radius in the order of 3 km for the anchor lay barge, 2 km for the DP pipe-lay vessel, and 500 m for other vessels that are restricted in their manoeuvrability, to be agreed further with the Danish authorities. The Project, in conjunction with relevant construction contractors and the Danish Maritime Authority, will announce the locations of the construction vessels and the size of the requested safety zones through Notices to Mariners in order to increase awareness of Project-related vessel traffic.

A helicopter port is planned to be based at Rønne (Bornholm) during construction. No other land based Project activities/facilities are expected or planned close to the mainland of Denmark, Bornholm or

Ertholmene, with the possible exception of some crew changes and some emergency sheltering in case of adverse weather.

There is a potential for chemical munitions to be present in the vicinity of the offshore pipeline route. Contact with identified chemical munitions will be avoided by marking the positions of the munitions in the navigation database as “areas to avoid.” This procedure is considered to negate the impacts from known chemical munitions. Where necessary, micro alignment of the pipeline route will be implemented to avoid disturbance of the munitions.

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 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 Project Schedule**

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

- Engineering survey and design 2018-2019
- EIA/ Permitting 2019
- Construction permit acquisition – October 2019
- Construction – end 2019
- Operation permit acquisition – 2020
- Commissioning – Q3 2020
- Operation – 2020 onward
- Decommissioning – end of operational life

## **2 Applicable Stakeholder Engagement Requirements**

The stakeholder engagement activities provided for in this SEP will be conducted in accordance with:

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

### **2.1 Danish Regulatory Requirements for Community Engagement**

Construction of pipelines on the Danish continental shelf for the transportation of hydrocarbons requires a permit pursuant to section 4(1) of the Act on the Continental Shelf and Certain Pipeline

Installations in the Territorial Waters<sup>1</sup> and section 2(1), cf. section 1 of the Administrative Order on Certain Pipeline Installations<sup>2</sup>.

Pursuant to the Administrative Order on the Tasks and Responsibilities of the Danish Energy Agency<sup>3</sup>, it is the Danish Energy Agency (DEA) that considers an application for a permit to construct pipelines for transportation of hydro-carbons on the Danish continental shelf. Further, it is the DEA that issues the permit on behalf of the Minister of Energy, Utilities and Climate.

Permits for the construction of pipelines like the NSP2 pipelines for the transportation of gas, oil and chemicals with a diameter exceeding 800 mm and a length of more than 40 km may only be granted on the basis of an EIA report. The requirements for the minimum content of the EIA report in accordance with the EIA Directive are outlined in section 20(2) and Annex 7 of the EIA Act<sup>4</sup>, and include, inter alia, a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment. A national Danish EIA report required for the Project was submitted to the Danish Energy Agency on the 15<sup>th</sup> April 2019, together with the application for the construction permit.

In accordance with the EIA Act, the EIA Directive<sup>5</sup> and the Aarhus Convention<sup>6</sup>, the authorities must enable public participation in environmental decision-making. Therefore, DEA must publish information concerning the application and the EIA report on the Agency's website and allow at least eight weeks for public consultation. Public participation may also involve stakeholder meetings and public presentations of technical material. During the public consultation, the affected public as well as environmental non-governmental organisations may provide comments or raise objections to the application and the EIA report.

As the NSP2 project may potentially have a significant transboundary impact on the environment of another state, the procedure under the Espoo Convention applies (Espoo procedure), as implemented in section 38 of the EIA Act (also see Section 2.2 below).

Due to the transboundary aspects of NSP2, a transboundary Espoo had previously been prepared for the entire project. The Danish EIA report submitted to the DEA on 15<sup>th</sup> April 2019 includes an additional transboundary impact assessment specific to the NSP2 route that runs west and north of Bornholm in Danish EEZ.

The Danish Energy Agency must take due account to the comments received to the EIA documentation and the outcome of the consultations. Further, the affected states must receive the final permit decision with the reasons and considerations on which it was based. When the DEA has made its decision on whether to grant a permit to NSP2, any states consulted must be provided with information about the decision.

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<sup>1</sup> Consolidated Act no. 1101 of 18 November 2005 on the Continental Shelf, as subsequently amended and most recent by Act no. 1401 of 5 December 2017 amending the title of the act to Act on the Continental Shelf and Certain Pipeline Installations in the Territorial Waters.

<sup>2</sup> Administrative Order no. 1520 of 15 December 2017 on certain pipeline installations in territorial waters and on the continental shelf.

<sup>3</sup> Administrative Order no. 1512 of 15 December 2017 on the tasks and responsibilities of the Danish Energy Agency.

<sup>4</sup> Consolidated Act no. 448 of 10 May 2017 on Environmental Impact Assessment of plans, programmes and specific projects (EIA).

<sup>5</sup> Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU.

<sup>6</sup> UNECE Convention of 25 June 1998 on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

After the Danish Energy Agency granted the permit on October 30, 2019, the permit decision was made available to the public on the Danish Energy Agency's website. The permit decision may be appealed to the Danish Energy Board of Appeal within 4 weeks from the issuance of the permit. The permit may not be utilised before the appeals period has expired.

## 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 and Germany.

The following conventions serve as a basis for EIA procedure and public participation under international law.

***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 ran broadly in parallel to all the national EIA procedures.

The Nord Stream 2 project was scheduled so that the national Environmental Impact Assessments / Studies performed in each of the five permitting countries for the construction and operation of the pipelines could be sent out for public consultation at the same time, as well as for 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 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 (PS) 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 management process.

## 3 Summary of key socio-economic and environmental aspects

### 3.1 Biodiversity

Impacts on biodiversity are consistent with impacts identified for species and habitats assessed in the Danish EIA. Additionally, there is potential for impact on species and habitats to combine. Based on a review of the potential for in-combination impacts it is considered that NSP2 will not impact the overall integrity and functioning of the habitat, nor the trophic interactions between species. Furthermore, the potential to introduce non-indigenous species is limited by compliance with Ballast Water Convention, and by the unfavourable (hypoxic/anoxic) conditions in the deep parts of the proposed NSP2 route which will prevent spread of hard-bottom organisms along the exposed surface of the pipeline.

The construction and operation of NSP2 will not result in a significant impact on the fundamental abiotic conditions that controls the biodiversity in the system (e.g. salinity and low oxygen content in bottom waters) or the main pressures on biodiversity (i.e. eutrophication, non-indigenous species and other anthropogenic disturbances).

No activities associated with the NSP2 project in the Danish sector will occur within Natura 2000 sites. The closest Natura 2000 site N252 "Adler Grund and Rønne Bank" is 18 km from the proposed NSP2 route, other Natura 2000 sites are more than 25 km away.

It is therefore assessed that impacts on biodiversity during construction and operation of the NSP2 will be negligible; none of the impacts, either individually or in combination, are assessed to be significant. It has been concluded that there will be no risk of significant impact on the designated species or habitats and there will be no significant impacts on the integrity of the Natura 2000 sites.

### 3.2 Ecosystem services

In Denmark the identified ecosystem services are performed by tourism and fishing. The NSP2 will be laid approximately 23 km from Bornholm Island and more than 25 km from Ertholmene, within the Danish EEZ. No land based activities are expected or planned close to the mainland of Denmark,



nor on Bornholm or Ertholmene with the possible exception of some crew changes and some emergency sheltering in case of adverse weather.

On both islands, the main sources of income are associated with tourism and fishing.

The main fishing hubs to date are in Nexø, Tejn and Hasle. The fishing fleet appears to be limited to small number of medium size vessels. Sustenance fishing (or hobby fishing) plays a major role in the communities. All coastal towns/settlements have a harbour and there are small to medium sized fishing boats in all harbours, however small, equipped with fishing gear that indicates semi-professional fishing activities.

In respect to fishing, the inner Baltic is subject to a number of regulations that define when and to what extent Danish and international fisheries can operate. The Bornholm Deep for example, is closed to fisheries from 1 May to 31 October, and is crossed by the NSP2 route. There is also an area east of Bornholm in which bottom trawling is discouraged due to possible presence of chemical munitions.

The waters around Bornholm and Ertholmene are well-suited for recreational activities such as bathing, recreational fishing and diving, which is possible either from the shore or from boats. Bornholm Island is also a popular destination for sailing enthusiasts. There are many well equipped marinas throughout the island and there is evidence that the island is used as a stopover by a large number of sailing yachts during the summer months.

There might be temporary minor impacts during construction due to the establishment of a safety zone around the offshore construction vessels.

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 (W-HS-EMS-GEN-PAR-800-FISHEREN) was developed and implemented by NSP2 in accordance with the good practice of International Finance Corporation.

### **3.3 Cultural heritage**

Several potential wrecks have been identified within 3 km from the NSP2 pipelines during the geophysical surveys. To ensure the integrity of CHOs during the construction and operation of NSP2, investigations aimed at identification of potential CHOs along the proposed NSP2 route. A recognised marine archaeology agency (Viking Ship Museum) has screened the survey data with the aim of assessing potential cultural heritage objects along the proposed pipeline route. Mitigation measures for confirmed objects of cultural heritage value will be made in consultation with the Danish Agency for Culture and Palaces which included, 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.

It has been assessed that potential impacts on cultural heritage from construction and operation of NSP2, either individually or in combination, are not significant.

### **3.4 Marine infrastructure and Military activities**

The Baltic Sea is one of the most intensely trafficked seas in the world and accounts for 15% of the world's cargo transportation. The majority of ships follow predesignated routes. Three primary ship traffic routes have been identified as crossed by the Danish section of the proposed NSP2 route. The highest number of annual ship crossings across the route is anticipated to be approximately

1,200 crossings associated with westbound traffic at the TSS Aldergrund shortly before the route passes into the German EEZ. There might be temporary minor impacts during construction due to the establishment of a safety zone around the offshore construction spread. During the construction phase of the NSP2 pipeline system, there could be a slight increase in ship traffic in the Baltic Sea due to the movements of the construction vessels.

There are several existing and planned infrastructure in close proximity to the NSP2 route. Within the Danish sector, the route would cross four telecom cables (two active and two out of service) and the NSP pipelines. Cable crossing agreements have been reached with the cable and pipeline owners. The route would not cross any planned or existing wind farms.

The route traverse military practise areas. NSP2 will, in due time, contact and coordinate with the appropriate authorities to ensure that there will be no conflict between military activities and the construction of the NSP2 pipeline.

### **3.5 Chemical and conventional munitions**

A variety of chemical munitions were dumped in the Bornholm Basin after the Second World War (WWII). Chemical munitions are munitions containing chemical warfare agents (CWA), whose toxic properties were designed to kill, injure or incapacitate humans.

A munitions screening survey using magnetometer (to detect unexploded ordnance, UXO) covering the pipe-lay corridor and the intervention works footprint has been completed. The Danish Navy (Søværnets) will be informed of any potential munitions/munitions-related objects and requested to evaluate the munitions and propose a method of handling the findings.

Chemical munitions will be left untouched and local re-routings will be done where required. Safety distances from the identified munitions will be defined in close cooperation with the Danish Navy (Søværnets). In the areas with potential risk of chemical munitions, precautionary measures to prevent human contact with chemical agents will be undertaken. This will include adequate training of staff and the provision of equipment in accordance with the guidelines from the Helsinki Commission (HELCOM) for preventative measures and first aid.

The routing has been adapted to safely accommodate all found munitions along the NSP2 routes.

No munitions clearance by controlled detonation is planned in Danish waters. Contact with identified munitions will be avoided by marking the positions of the munitions in the navigation database as "areas to avoid." Such approach is considered to negate the impacts from munitions on people and marine environment.

The NSP2 route crosses an area where bottom trawling, anchoring and works on the seabed are discouraged due to the risk of encountering chemical munitions. Environmental surveys and consequent risk assessment demonstrated that there is no risk to the marine environment from CWA containing in seabed sediments.

### **3.6 Transboundary aspects**

Transboundary impacts from construction and operation of NSP2 pipelines have been assessed in the Danish EIA. Potential for transboundary impacts has been identified for Sweden, Germany and Poland. No significant transboundary impacts from construction and operation of Nord Stream 2 pipelines in the Danish part of the route has been identified.

## 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 Denmark the affected parties consist of Russia, Estonia, Latvia, Lithuania, Poland, Finland, Sweden, and Germany.

Stakeholder identification has been made by NSP2, 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 on-going 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 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 summarised in Attachment 1, broken down by Interested Parties, Affected Stakeholders. Key specific representatives of each stakeholder category are also provided in Attachment 1.

## 4.2 Affected Stakeholders

The following groups of affected stakeholders have been identified:

- Pipeline and Cable operators,
- Fishing companies and fishermen association
- Shipping companies
- Cultural organisations, tourism
- 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**

Socio-economic / environmental aspect	Affected Stakeholders
Ecosystem services	<ul style="list-style-type: none"> <li>• Regional Municipality of Bornholm</li> <li>• Fishing (including Danmarks Fiskeriforening Producent Organisation, Bornholms og Christiansø Fiskeriforening, Sportsfiskerforeningen Havørre, Bornholms Sportsfiskerforening, Rederiet Elida fishing, Ædelfisken and Bornholms Trollingklub);</li> <li>• Sailing (individuals/clubs including Nexø Sejlklub, Svaneke Sejlklub, Rønne Sejlklub, Hasle Sejlklub, Tejn Sejlklub);</li> <li>• Diving (individual clubs/centres including Diveline, Dykkerklubben Volans, Bornholms Sportsdykkerklub Calypso and Dykkercenter Bornholm)</li> </ul>
Marine infrastructure and Military activities	<ul style="list-style-type: none"> <li>• Commercial enterprises: <ul style="list-style-type: none"> <li>○ ferry operators</li> <li>○ Shipping and passenger vessel companies (including Christiansø Færgen, Kołobrzaska Żegluga Pasażerska, Bornpol and BornholmerFærgen).</li> </ul> </li> <li>• Cable operators: <ul style="list-style-type: none"> <li>○ TDC</li> <li>○ Energinet</li> </ul> </li> <li>• Pipeline operators: <ul style="list-style-type: none"> <li>○ Nord Stream AG</li> </ul> </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 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:

Other authorities will be informed and consulted on Project matters as appropriate following legislative requirements and via informal consultation. Detailed list is included in Annex 2.

- Convention Officials: Espoo convention focal point representatives, HELCOM representatives; affected countries representatives in Espoo conventions.
- Public organizations:
  - regional, national and international non-governmental organisations 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;
  - 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 12.

**Table 2 Identification of Interested parties**

Socio-economic / environmental aspect	Interested parties
Biodiversity, Environmental, Socio-economic	<ul style="list-style-type: none"> <li>• Main permitting authority <ul style="list-style-type: none"> <li>◦ Danish Energy Agency</li> </ul> </li> <li>• Other involved authorities: <ul style="list-style-type: none"> <li>◦ Danish Working Environment Authority</li> <li>◦ Danish Maritime Authority</li> <li>◦ Danish Environmental Protection Agency</li> <li>◦ Danish Agency for Culture and Palaces</li> <li>◦ Danish Agrifish Agency</li> <li>◦ Danish Geodata Agency</li> </ul> </li> <li>• HELCOM</li> <li>• NGOs: <ul style="list-style-type: none"> <li>◦ WWF Denmark</li> <li>◦ Greenpeace Nordic</li> <li>◦ Danish Society for Nature Conservation</li> <li>◦ Danish Ornithological Society</li> <li>◦ Avaaz</li> <li>◦ NOAH</li> </ul> </li> <li>• Research centre: <ul style="list-style-type: none"> <li>◦ Danish Meteorological Institute</li> </ul> </li> </ul>
Cultural heritage	<ul style="list-style-type: none"> <li>• Authorities: <ul style="list-style-type: none"> <li>◦ Danish Agency for Culture and Palaces</li> </ul> </li> <li>• Cultural organisations: <ul style="list-style-type: none"> <li>◦ Viking Ship Museum</li> </ul> </li> </ul>
Military activities	<ul style="list-style-type: none"> <li>• Authorities: <ul style="list-style-type: none"> <li>◦ Danish Navy</li> <li>◦ Danish Ministry of Defence</li> <li>◦ Danish Armed Forces</li> <li>◦ Danish Home Guard</li> </ul> </li> </ul>
Transboundary impacts	<ul style="list-style-type: none"> <li>• Espoo convention focal points</li> </ul>

## 5 Stakeholder Engagement Activities Undertaken to Date

**National EIA and Espoo consultations** The consultation period for the Nord Stream 2 project was initiated in 2013 when a Project Information Document (PID) was submitted to both national and international authorities (through the coordinating authority under the Espoo Convention), NGOs and other stakeholders. During the public hearing period, statements from various authorities,

citizens and non-governmental organizations were requested and public meetings were held. Based on the opinions and statements received, the coordinating authority issued its statement on the EIA program. This first phase of the EIA procedure was completed in June 2013.

Based on the feedback received during this initial consultation process, Nord Stream 2 carried out environmental investigations and assessments in order to establish national EIAs and the Espoo documentation. Through autumn 2015 - winter 2017 various engagements were held with stakeholders pertaining to specific questions related to the NSP2 route planning.

A national Danish Environmental Impact Assessment (EIA) report for the base case route was submitted to the Danish Energy Agency together with the application for the construction permit in April 2017 (base case route). Due to an amendment of the Continental Shelf Act (1 January 2018) which provides the Danish Ministry of Foreign Affairs the right to recommend, based on wide-ranging considerations, whether an application for infrastructure projects, such as gas transmission pipelines traversing territorial waters shall or shall not be further handled by the Danish Energy Agency, Nord Stream 2 AG decided to explore alternative routes outside of Danish territorial waters. Based on the survey works, engineering and environmental assessments carried out, a viable alternative route was identified outside Danish territorial waters only passing through the Danish exclusive economic zone north-west of Bornholm.

On 10 August 2018, Nord Steam 2 submitted an application for construction together with an Environmental Impact Assessment (EIA) for the alternative route north-west of Bornholm (North-western route). A public hearing was held in Rønne on Bornholm on 14 November 2018.

A public consultation period relating to the Espoo documentation was held in consultation with the affected states (Germany, Sweden, Finland, Russia, Estonia, Latvia, Lithuania, and Poland) during 12 weeks: from 26 September 2018 to 19 December 2018. The national consultation process ended on 12 December 2018.

A summary of the consultation undertaken to date is provided in the Table 3 below. Stakeholder engagements related to the base case route are essential for development of the north-western route and therefore are included.

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

Stakeholder/Stakeholder Category	Engagement topic	Indicative Timing	Key Actions/Disclosed Information
<b>Base case route</b>			
All stakeholders	Information meetings	2012-2013	General project related issues such as time line, crossings, lay techniques, routing, impacts etc.
Authorities, NGOs, general public	Public Information Document (PID)	April 2013	Consultation document sent for comments (in parallel to the Espoo PID)

Stakeholder/Stakeholder Category	Engagement topic	Indicative Timing	Key Actions/Disclosed Information
Authorities, NGOs, general public		May 2013	Project presentation and open forum for questions from the audience
Authorities	Withdrawal of the application	June 2019	Letter informing Danish authorities that the application is withdrawn
<b>North-western route</b>			
Authorities	Project information update EIA preparation	January-September 2018	Project time line, project information, draft EIA, etc.
Authorities	Referral round with the authorities to receive comments to the draft EIA	May 2018	Draft EIA
Cable and pipeline owners	Crossing agreements	Q3 2018	General project information; cable and pipeline crossing agreements
Authorities	Application submission	August 2018	Permit application (incl. Environmental Impact Assessment)
All stakeholders	Public hearing on Bornholm	November 2018	Public hearing: EIA report Espoo documents Presentation Leaflet Maps and Atlas
<b>South-Eastern route</b>			
Authorities	Project information update	April 2018	Routing, Permit application incl. Environmental Impact Assessment (for initial comments from the authorities)
Authorities	Application submission	April-May 2019	Permit application (incl. Environmental Impact Assessment)

Stakeholder/Stakeholder Category	Engagement topic	Indicative Timing	Key Actions/Disclosed Information
Cable and pipeline owners	Crossing agreements	Q4 2019	Update on the cable and pipeline crossing agreements
Fishermen	Fishermen agreement	October 2019	Fishermen agreement to compensate potential losses
All stakeholders	Public hearing on Bornholm	June 2019	Public hearing: EIA report Espoo documents Presentation Leaflet Maps and Atlas

**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>7</sup>. Negotiations to reach agreements with fishery associations were carried out by NSP2. Permanent contacts were established and will be maintained during the project's 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's execution.

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 however does not include the information on the regular notifications, calls, e-mails exchange.

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<sup>7</sup> W-HS-EMS-GEN-PAR-800-FISHEREN-01 Fisheries Livelihood Plan

## 5.1 Issues Raised

Feedback that has been received from the Danish authorities and the national and Espoo consultation are summarised in Table 4.

**Table 4. Stakeholder Feedback received to date on the Danish EIA for the South-eastern route.**

Key Areas of Concern	Issues Raised	Addressed In Draft EIA
Fish	Impacts on cod spawning and time restrictions for construction activities	Chapter 7.9 Chapter 9.8
Marine mammals	Potential impacts on marine mammals with focus on Annex IV species	Chapter 7.10 Chapter 9.9
Birds	Potential impacts in Birds	Chapter 7.11 Chapter 9.10
Natura 2000	Potential impacts on Natura 2000 sites, namely on the Polish Natura 2000 sites	Chapter 7.13 Chapter 9.12
Marine strategic planning	Compliance with WFD and MSFD	Chapter 10
Chemical warfare agents (CWA)	SE route goes through the area, where anchoring, trawling and seabed intervention works are discouraged due to presence of CWA	Chapter 7.3 Chapter 7.18 Chapter 8.4
Environmental monitoring stations	Some long-term environmental monitoring stations are located in the vicinity of the route	Chapter 7.24 Chapter 9.22
Decommissioning	Feasibility of removal of the pipeline at the end of operational life	Chapter 11
Climate and air	Reaching climate goals	Chapter 3
Emergency preparedness	Risk assessment	Chapter 13

The Permit application for the South-eastern route including the EIA and Espoo documentation (transboundary impacts, non-technical summary, draft permit and permit application summary) was submitted to the DEA on the 15<sup>th</sup> April 2019. The Danish authorities provided initial comments to the EIA for implementation prior to going into public consultation phase. Updated EIA was submitted to the DEA in May 2019 and public consultation phase started on 15<sup>th</sup> May 2019. A public hearing was held on Bornholm on 19<sup>th</sup> June 2019.

Comments from the general public and authorities were handed to NSP2 on 10<sup>th</sup> July 2019 for the national consultation round and 17<sup>th</sup> July 2019 for the Espoo consultation round. Responses to all received comments has been provided to the coordinating authorities and taken into consideration for the project planning.



## 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 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 socially important events, which are organized by the Company, and also other needed information will 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 are organised on a regular basis to provide accurate and current information of the project and its progress.
  - Press releases. The general public is informed via media of all relevant and important project milestones and current activities with press releases with direct distribution and placement in developer's website.
- Printed announcements, posted for local communities, give-aways
- Letters exchange
- Brief information
- Web-site <http://www.nord-stream2.com/>
  - General, as well as specific project information is published on a company's homepage. Denmark specific information is displayed at a designated web-page: <https://www.nord-stream2.com/permitting-denmark/>
  - Announcements are published on the company's homepage
- 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 hearing(s):** During the public hearing period of the EIA report, information sessions were held in order to give the public an opportunity to participate and comment on the possible consequences of the project in Denmark. A public hearing was held to present the project and the assessment results. This meetings was chaired by the EIA coordinating authority.

**Public liaison offices.** The public liaison offices will be opened by the authority to bring to communities relevant information by posting hard copies of Project documents at public places (incl. local libraries).

**Targeted informing and consulting.** It is implemented though direct contacts of Project authorized persons with representatives of stakeholders or by using the telephone and on-line communication



tools. Established contacts with representatives of the authorities, commercial organisations, NGOs will be used in the targeted informing procedures.

**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

**Workshops, forums and conferences.** The Project consider forum 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.

**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 2 pipeline's lay vessels may be organised for authorities and interested media, and site visits to the Nord Stream landfalls can be organised 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 current stage of the process. Documents that have been disclosed at this stage are listed in Table 5 below:

**Table 5. EIA Information disclosure plan**

Document Title	Disclosure Date	Topic	Means of Disclosure	Stakeholders
Danish EIA, Permit application, Espoo documentation	15 April 2019	EIA and Espoo documentation	Formal submission (hard copy)	Danish Permitting Authorities
Danish EIA, Permit application, Espoo documentation	6 May 2019	Updated EIA and Espoo documentation	Formal submission (hard copy)	Danish Permitting Authorities
Press release of filing of application and release of the EIA to public	15 May 2019	Permit application, EIA	Press release	All Stakeholders and general public

Danish EIA	15 May 2019- 10 July 2019	Environmental Impact Assessment	Hard copies Public liaison offices  Web-site	All Stakeholders and general public
Transboundary chapter Non-Technical summary Permit application summary Draft Permit	15 May 2019- 17 July 2019	Transboundary impacts	Hard copies Public liaison offices  Web-site	All stakeholders and general public
Leaflet  Presentation  Communication materials	Q2-Q3 2019 (including Public hearing on 19 June 2019)	General Project information	Meetings  Web-site	All stakeholders and general public
Environmental monitoring report	2021; On a yearly basis	Results of environmental monitoring	Formal submission  Web-site	Danish Permitting Authorities  All stakeholders
Stakeholder engagement plan	Q4 2019	Environmental and Social risks management	Web-site	All Stakeholders

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 Planned Stakeholder Engagement Activities

An overview of the planned stakeholder engagement activities for the following project phases with breakdown by stakeholder group and Project phase is given in the table 6 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 Plan**

Stakeholder/Stakeholder Category	Engagement topic	Stakeholder Engagement and Methods	Indicative Timing	Responsibility	Key Actions/Disclosed Information	Location/Engagement Outputs
<b>Permitting phase</b>						
Danish Energy Agency	Application submission	One-to-one meetings Official correspondence	April 2019 and onwards	Nord Stream 2 AG	Permit application (incl. EIA)	Correspondence
<b>Construction phase</b>						
All stakeholders	Project activities	Information distribution	End 2019	Nord Stream 2 AG	Project implementation	tbc
Authorities	Environmental monitoring reporting	Reports	2021	Nord Stream 2 AG	Results of monitoring during construction	tbc
Marine users	Project activities	Information distribution	End 2019	Authority / Nord Stream 2 AG	Project implementation	tbc
Military services	Project activities	Information distribution	End 2019	Authority / Nord Stream 2 AG	Project implementation	tbc
<b>Operational phase</b>						
All stakeholders	Project implementation	tbc	Tbc	Nord Stream 2 AG	Project reporting	tbc
Authorities	Environmental monitoring reporting	Reports	2021-tbc	Nord Stream 2 AG	Results of monitoring during operation; duration of reporting	tbc

Stakeholder/Stakeholder Category	Engagement topic	Stakeholder Engagement and Methods	Indicative Timing	Responsibility	Key Actions/Disclosed Information	Location/Engagement Outputs
					to be defined by authorities	

## 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's personnel. A dedicated Grievance mechanism procedure<sup>8</sup> was developed and is implemented by NSP2 to ensure that 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 and Their Collection

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:

- **E-Mail:** denmark@nord-stream2.com
- **Post:** Baarerstrasse 50-54, 6300 Zug, Switzerland
- **Telephone:** +41 41 414 54 54

#### ***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.

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<sup>8</sup> W-HS-EMS-GEN-PRO-800-GRIMECEN-02 Grievance mechanism procedure

## 7.2 EIA Feedback Management

The Danish national permitting process will be managed by the Danish Energy Agency. All questions and comments submitted during the public consultation phase must be filed to the Danish Energy Agency. All correspondence with the Danish Energy Agency must be made in writing.

The Company is formally required to respond to questions and comments about the Project collected by the above-mentioned bodies and forwarded to the Company with a request to provide responses, when relevant. Stakeholder feedback will be considered during the course of the whole EIA process. The Company will develop measures to satisfactorily address stakeholder representations.

Stakeholder feedback will be systematically collected and included in a database to enable tracking and monitoring of follow up actions that may be required.

## 7.3 Grievance Mechanism

A Grievance Mechanism is established to receive and facilitate resolution of external stakeholder grievances concerning the Company. 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 operations, including those of contractors.

The Grievance Mechanism serves to:

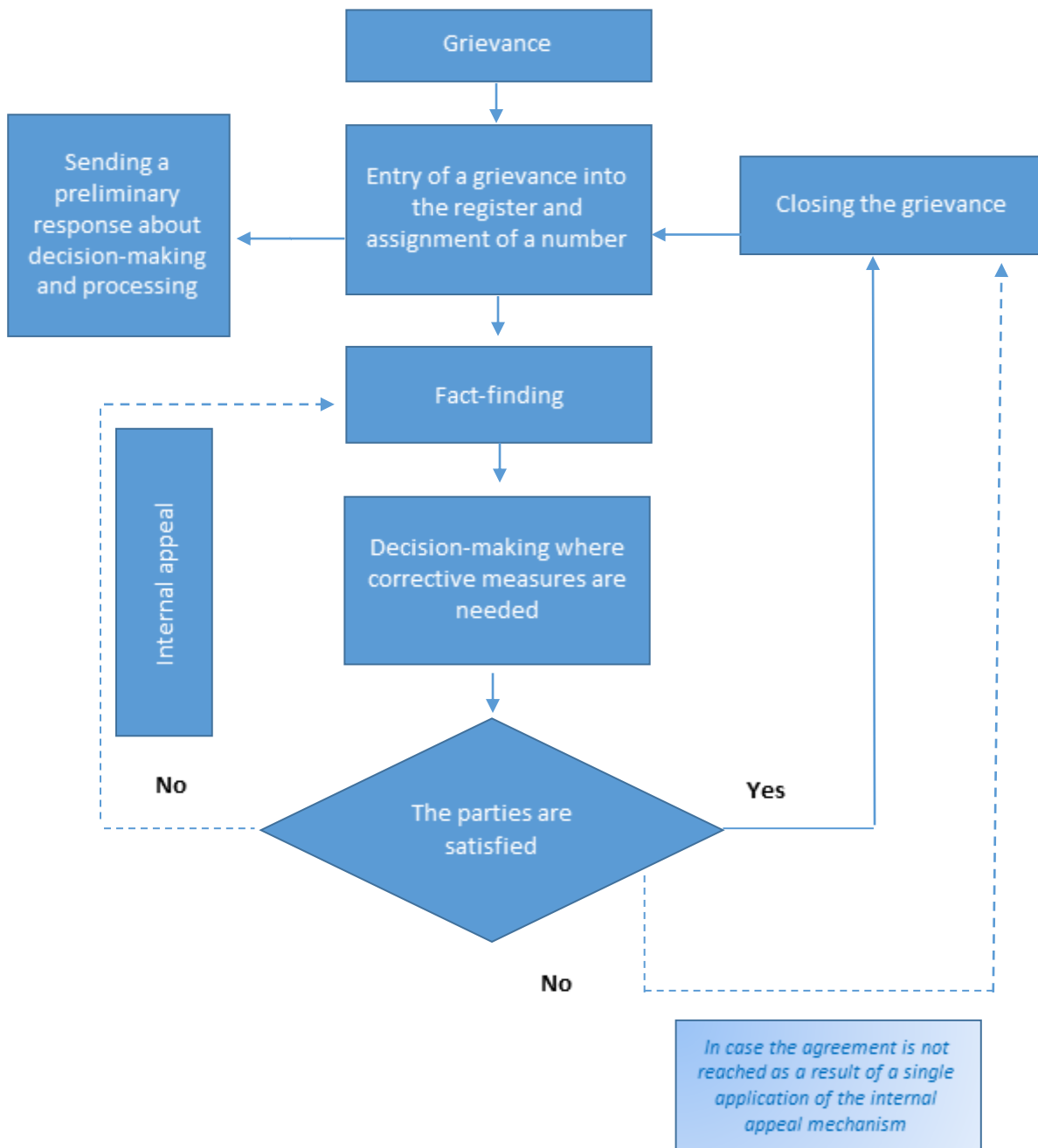
- Minimise any adverse impacts of the Company on external stakeholders via quick and mutually acceptable resolution of grievances;
- Identify emerging adverse trends in terms of incidents/impacts at an early stage so that measures to prevent/avoid their occurrence can be implemented quickly and proactively;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

Contractors may implement their own Grievance Mechanisms, but they must be aligned with the Company 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**

Danish SEP is a part of the environmental and social management system of the Company. Responsibility for the Danish SEP implementation at the current project stage rests with the Permitting Department at the Head Office of the Company.

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 Danish 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 Danish 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 Danish 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 Danish 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.

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

## **Annex**

### **Project Stakeholders List**



Stakeholder level	Stakeholder category	Stakeholder
<b>Interested parties</b>		
International	NGOs	Greenpeace Nordic WWF Denmark Avaaz
National	Authorities	Danish Energy Agency Danish Working Environment Authority Danish Maritime Authority Danish Environmental Protection Agency Danish Agency for Culture and Palaces Danish Agrifish Agency Danish Geodata Agency
	Ministries	Ministry of Foreign Affairs Ministry of Energy, Utilities and Climate
	NGOs	Danish Society for Nature Conservation Danish Ornithological Society NOAH
	Research centres	Danish Meteorological Institute
	Cultural organisations and experts	Viking Ship Museum
	Military/ Authorities	Danish Navy Danish Ministry of Defence Danish Armed Forces
Regional	Military/ Authorities	Danish Home Guard
<b>Affected Stakeholders</b>		
International	Cable and Pipeline owners	TDC Polish Telecom Nord Stream AG
	Commercial Association	Shipping and passenger vessel companies (for example: Kołobrzaska Żegluga Pasażerska and Bornpol
National	Commercial Association	Shipping and passenger vessel companies (for example: Christiansø Færgeren and Bornholmer Færgeren)
	Fishing	Danmarks Fiskeriforening Producent Organisation (Danish Fishermen organisation)
Regional	Fishing	Bornholms og Christiansøs Fiskeriforening (Bornholm and Christiansø Fishery Association) Non-Commercial fishermen (for example: Sportsfiskerforeningen Havørre, Bornholms Sportsfiskerforening, Rederiet Elida fishing, Ædelfisken, Bornholms Trollingklub)
	Local community, incl. vulnerable groups	Recreational marine uses including sailing and dive clubs (for example: Nexø Sejlklub, Svaneke Sejlklub, Rønne Sejlklub, Hasle Sejlklub, Tejn Sejlklub, Diveline, Dykkerklubben Volans, Bornholms Sportsdykkerklub Calypso and Dykkercenter Bornholm.

	Authorities	Regional Municipality of Bornholm
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