ATKINS

Deepwater Container Terminal, Gdańsk, Poland

Environmental and Social Action Plan

Client: DCT Gdańsk S.A.

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Plan Design Enable

Table of contents

Tables

1. Introduction

DCT GDANSK S.A. (“DCT Gdansk” or “the Company”) is planning the construction of deep sea container terminal (“DCT 2” or “the Project”) within existing Port of Gdansk in Poland. DCT Gdansk is an operator of the largest container terminal in Poland (DCT1) since 2007.

The Project will be constructed in the area adjacent to existing deep sea container terminal (”DCT) DCT 1 terminal, within the industrial area of Northern Port of Gdansk and will require land reclamation to build a new 650 m long sea wall and achieve circa 47 ha operational area.

The Project aims at increasing the throughput and improving the container transloading capacity of the Port of Gdansk. The Project will allow to increase the current transloading capacity by 2,5 mln TEU[1], and achieve the total capacity of DCT to 4 mln TEU.

The Project is at an intermediate stage of development:

- The concept study has been developed for the Project.
- An Environmental Impact Assessment (EIA) for regulatory requirements has been undertaken by the company EKO-KONSULT Biuro Projektowo-Doradcze in 2013.
- The Project has obtained the environmental consent dated 28.03.2014. The decision determines environmental conditions for construction of new deepwater container terminal.
- An Environmental and Social Impact Assessment (ESIA) report was produced by WS Atkins-Polska Sp. z o.o. to support the EBRD and NIB funding process.

Before and during construction, and then throughout operation of the Project, DCT Gdansk will need to implement a series of actions to avoid, reduce, or otherwise control potentially significant environmental and social impacts identified in the ESIA, required under Polish law and also to ensure compliance with the requirements of the EBRD and NIB. These requirements are presented in the form of an Environmental and Social Action Plan (ESAP) for the Project. The ESAP is presented in this document.

The ESAP will be part of the financing agreement between EBRD, NIB and DCT Gdansk. The performance of the required actions will be reported to EBRD and NIB at least annually by DCT Gdansk and may be audited or otherwise evaluated by the EBRD and NIB throughout the term of the Project.

Implementation of all of the actions is the responsibility of DCT Gdansk . When other companies perform work on behalf of DCT Gdansk under contract, DCT Gdansk will be responsible for those contractors’ compliance with the relevant ESAP requirements. This is expected to be accomplished by inclusion of the relevant ESAP requirements in contracts and subcontracts, and by direct oversight and supervision by DCT Gdansk.

2. The ESAP

The ESAP presented in the table over the page is for the DCT 2. The ESAP identifies the required actions, the basis of the requirements, the timing when the actions have to be implemented and/or completed, the criteria to be used for determining whether the required action has been successfully achieved and, the information that is to be reported to EBRD and NIB.

As agreed by the parties, this ESAP may be revised from time to time during project development. No changes will allow violations of Polish and European Law law or of EBRD and NIB requirements for environmental and social performance.

[1] TEU = (twenty-feet equivalent unit) jednostka równoważna objętości kontenera o długości 20 stóp. Standardowy 20-stopowy kontener ma wymiary dł. 20×szer. 8×wys. 8,5 stopy, czyli 6,10×2,44×2,59 metra i objętość ok. 38,5 m3. Obecnie standardem są dłuższe kontenery 40-stopowe.

Table 2-1 DCT 2 Environmental and Social Action Plan

No.	Action	Environmental Risk, Liability / Benefit	Legislative Requirement / EBRD / Good practice	Investment Needs / Resources Costs	Timetable Action to be Completed	Target and Evaluation Criteria For Successful Implementation	Comment
A. Environmental and Social Management Issues							
A.1	**ESHS Management System** DCT Gdansk shall implement Environmental, Social, Health and Safety ("ESHS") management system consistent with ISO14001 and OHSAS18001. The system should include employees, subcontractors and any other persons acting for the Project. The management system shall include the following requirements as detailed in the ESMP: • Environmental and Social Policy • Grievance Mechanism • Stakeholder Engagement Plan • Construction Environmental, Health and Safety Management Plan and Operational Environmental, Health and Safety Management Plan, including emergency respond, traffic and transport (Transport Management Plan) • Archaeological Findings Procedure • Construction and Operational Procedures compliant with internal regulations of Port of Gdansk (regarding dredging, traffic, ballast and bilge water, waste and oil, hazardous material handling) • Safety procedures regarding unexploded ordnance	Optimisation of management through a formalised system. Clear organisational structure. Environmental, health and safety risk minimalisation. Compliance with European, national and Port of Gdansk regulations.	Good Practice BAT EBRD PR 1, PR 2 and PR 10 E&S Policy	Own resources plus external support if required	Prior to construction for building stage and prior to start up for operation stage.	Implementation of the ESHS management system.	ESHS management plan should be maintained and up to date throughout the whole life of the project. Transport Management Plan will be consulted with institutional stakeholders as well as other Port roads users. It is recommended to adapt DCT 1 existing procedures. Construction EHS Management Plan should include recommendation for General Constructor to develop and implement measure to prevent from negative impacts of influx of construction work (e.g. regulations, code of conduct, cooperation with police, and engagement of local communities).

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A.2	**Annual Reporting** Provide the investor with information on the environmental, health, safety and social matters in the form of an Annual Environmental and Social Report (AESR).	Need to disclose information to the Lender to show compliance with ESAP and current status of ESHS issues.	EBRD and NIB Environmental and Social Procedures	Own resources plus external support if required	12 months after financial close and annually for the duration of the agreement.	AESR against the actions listed within this ESAP.	
A.3	**Public disclosure** Communicate requirements of EHS policies and practices to employees, contractors and any parties engaged in Project realisation. Inform about the progress of the Project and undertaken environmental and social activities.	Need to disclose environmental and social information to the public	EBRD and NIB Environmental and Social Procedures	Own resources plus external support if required	On a yearly basis	Information disclosed on the Project webpage.	

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B. Pre-Construction Stage							
Permitting							
B.1	**Dredging Material Disposal** Obtain a permit to dispose dredging material within Gulf of Gdansk. The application should be prepared according to the National regulations and include environmental impact statement. It should be submitted to the relevant authorities (Marine Authority in Gdynia). Carry out sampling and laboratory analysis of dredged material prior to development of	Risk management. Provide baseline data to decide of and for use in analysis of post-construction monitoring (if necessary).	National regulations EBRD PR 1, PR 6 Good practice	Internal project costs. Laboratory services and expert fees.	Prior to construction.	Results reviewed by specialist. Obtained permit.	The permit must be obtained by the owner of the ship performing dredging works. According to Polish environmental regulations dredging material disposal does not require an obligatory EIA procedure.

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	impact statement.						
B.2	**Flood risk** Obtain a permit to realise the Project in the area at risk of flooding. Include proper flood analysis into the design of the terminal.	Compliance with the regulations.	National regulations	Internal project costs.	Prior to construction.	Obtained permit.	
B.3	**Archaeological survey** Obtain a permit to search for hidden or abandoned archaeological sites, wrecks and artifacts in the Project area. Develop archaeological works programme according to the permit. Document archaeological works.	Compliance with the regulations.	National regulations	Internal project costs. Expert fee.	Prior to construction.	Obtained permit. Archaeological works programme.	Archaeological works must be documented according to the regulations.
Ecology							
B.4	**Compensatory activities to minimise birds and bats impact** Develop wintering sites for bats currently using a former military shelter (to be demolished) according to the environmental consent. Develop breeding site to compensate the loss of breeding area due to the Project realisation. Ensure bat and bird expert supervision.	Minimise ecological impact. Provide ecological enhancements. Enhanced corporate reputation	National regulations. Environmental consent. Good practice	Internal project cost. Expert fee.	Prior to construction, with ongoing management	Monitoring of areas by ecological specialists to assess the habitat quality.	
Health, Safety and Public Nuisance							
B.5	**Unexploded ordnance** Ensure safety during construction works, in particular with regard to unexploded ordnance. Develop and implement safety procedures. Perform appropriate survey prior to start of	Minimise risk of accidents. Provide safety enhancements.	National regulations. Good practice	Internal project cost. Expert fee.	Prior to construction, with ongoing management	Safety procedure	Cooperation with specialised military unit is recommended.

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	construction works.						

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C. Construction Stage							
C.1	**Geological supervision** Provide supervision of geologist during on-shore earth works and off-shore dredging works in case when the occurrence of a quantity of amber warranting its excavation is stated. Develop exploratory works programme and obtain concession to excavate amber (if necessary).	Compliance with the regulations.	National regulations	Internal project costs. Expert fee. Exploratory work cost.	Immediately following the occurrence.	Exploratory works programme Obtained permit.	
C.2	**Archaeological supervision** Provide archaeological supervisory over construction period and during dredging works. Any findings must be reported and forwarded to the Central Maritime Museum.	Compliance with the regulations.	National regulations	Internal project costs. Expert fee. Archaeological work cost.	Immediately following the occurrence.	Report on archaeological works.	

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D. Operational Stage							
D.1	**Implementation of Environmental**	Assurance of	National	Internal project	Throughout	Site inspection	Results of analyses

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	Consents Conditions Implement the requirements of environmental consent decisions. These should include birds, bats and noise post-construction monitoring.	regulatory compliance and compliance with the performance standards stipulated by the investor.	regulations Good practice EBRD PR 3, PR 4 and PR 6	cost and/or external experts (birds, bats, noise)	operation. According to conditions of environmental consent.	EIA Compliance audits/ performance assessments	during operation should be summarised and published. Should any impact on receptors be identified then appropriate mitigation measures should be implemented.
D.2	**Bird and Bat Post-Construction Monitoring** Develop and implement agreed with local authorities post construction monitoring within the compensatory activities areas.	Minimise ecological impact. Enhanced corporate reputation	Legislative requirements Environmental consent EBRD PR 1, PR 3 and PR 6	Internal project cost and/or external experts (birds, bats monitoring)	5 years monitoring for birds 10 years monitoring for bats	Results reviewed by birds/bats specialist.	Results of post-construction monitoring need to be carefully assessed. Mitigation measures should be planned if necessary.
D.3	**Post-Construction Noise Monitoring** Undertake post-construction noise monitoring. The aim of this will be to assess the efficiency of noise reduction measures that are implemented and to confirm that the acoustic power level of installation and its parts are within prescribed limits.	Minimise environmental impact. Risk management. Ensure that noise limits are met. Enhanced corporate reputation	Legislative requirements Environmental consent EBRD PR 1, PR 3 and PR 6	Internal project cost and/or external experts (noise specialist)	Within 6 months from the date of commissioning	Results reviewed by noise specialist.	Mitigation measures should be planned if necessary.
D.4	**Waste and waste water monitoring** Carry out rain water monitoring against oil derivatives and suspended solids. The scope of monitoring should be reviewed if needed (e.g. with regard to new emission sources). Keep wastes records.	Compliance with regulations. Risk management.	Legislative requirements Good practice	Internal project cost. Cost of laboratory analyses.	According to the legal requirements	Waste register. Waste water analyses.	Mitigation measures should be planned if necessary.
D.5	**Sea level and wave overtopping**	Risk management	Industry	Internal project cost	Within 6 months of	Report to EBRD	Should any impact on port assets or

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	monitoring Establish communication channel with the Port Authority to receive relevant information about sea level extremes and wave overtopping of port structures	Minimise damage to facilities Minimise disruption to operations	good practice EBRD sector guidance	including liaison with Port Authority	the date of commissioning		operations be identified then appropriate mitigation measures should be implemented.

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E. Decommissioning Stage							
E.1	**EHS Decommissioning Plan** Implement environmental, health and safety decommissioning management plans. The plan should be maintained and up to date throughout the decommissioning phase of the project.	Minimise incident risk	Local Regulatory Requirements & International Standards Good practice	Internal project costs	Plan should be in place prior to de-commissioning and should be maintained throughout the de-commissioning process.	Development and implementation of an appropriate HSE De-commissioning Plan	

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