

# Stakeholder Engagement Plan and Grievance Mechanism

**ATKINS**

Construction of Container Terminal T2 with a throughput capacity of 2,500,000 TEU in the Northern Port (*Port Północny*) in Gdańsk

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Plan Design Enable

# Notice

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# 1. Introduction

DCT GDAŃSK S.A. is planning to construct maritime Deepwater Container Terminal DCT 2 with a throughput capacity of 2,500,000 TEU in the Northern Port in Gdańsk<sup>1</sup>. This project will be implemented in the vicinity of the existing Deepwater Container Terminal DCT 1, which will allow an increase in the total throughput capacity of the facility to 4,000,000 TEU.

The project includes the construction of a new port infrastructure for cargo loading and unloading, connected to the mainland. The operation of DCT 2 Terminal will have functional links with the currently operating DCT 1 Terminal, with both the integrity and the technological and organizational separateness of each facility being maintained.

This Stakeholder Engagement Plan (SEP) presents the planned stakeholder consultation and engagement process for the Project. It outlines a systematic approach to stakeholder engagement that will help DCT GDANSK S.A. develop and maintain over time a constructive relationship with their stakeholders throughout the duration of the Project. The document also includes a grievance mechanism for stakeholders to raise their concerns about the Project. The SEP has been produced in accordance with the international standards required by the European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC)<sup>2</sup>.

## 2. Project Description

### 2.1. Project Location

The planned project will be implemented within the city of Gdańsk, and in the Poland's coastal waters within the Gdańsk Bay area, in Pomorskie province (northern Poland).

The project will cover an area of approx. 47 ha of anthropogenically transformed coast of the port (Northern Port), between the existing Deepwater Container Terminal DCT 1 (to the east) and the unoccupied port area (to the west), as well as the partly wooded strip of dunes. To the north, the planned project cuts into internal maritime waters surrounded by an ore loading pier, island breakwater, and the DCT 1 pier.

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<sup>1</sup> TEU = (twenty-feet equivalent unit), a unit of cargo capacity based on the volume of a 20-foot-long (6.1 m) container. A standard 20-foot-long container has the following dimensions: length of 20 x width of 2 x height of 8.5 feet i.e. 6.10 x 2.44 x 2.59 meters, and a capacity of approx. 38.5 m<sup>3</sup>. Currently, longer (40-foot-long) containers are standard.

<sup>2</sup> Stakeholder Engagement: A Good Practice Handbook for Companies doing Business in Emerging Markets', IFC, 2007; [http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/p\\_StakeholderEngagement\\_Full/\\$FILE/IFC\\_StakeholderEngagement.pdf](http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/p_StakeholderEngagement_Full/$FILE/IFC_StakeholderEngagement.pdf)

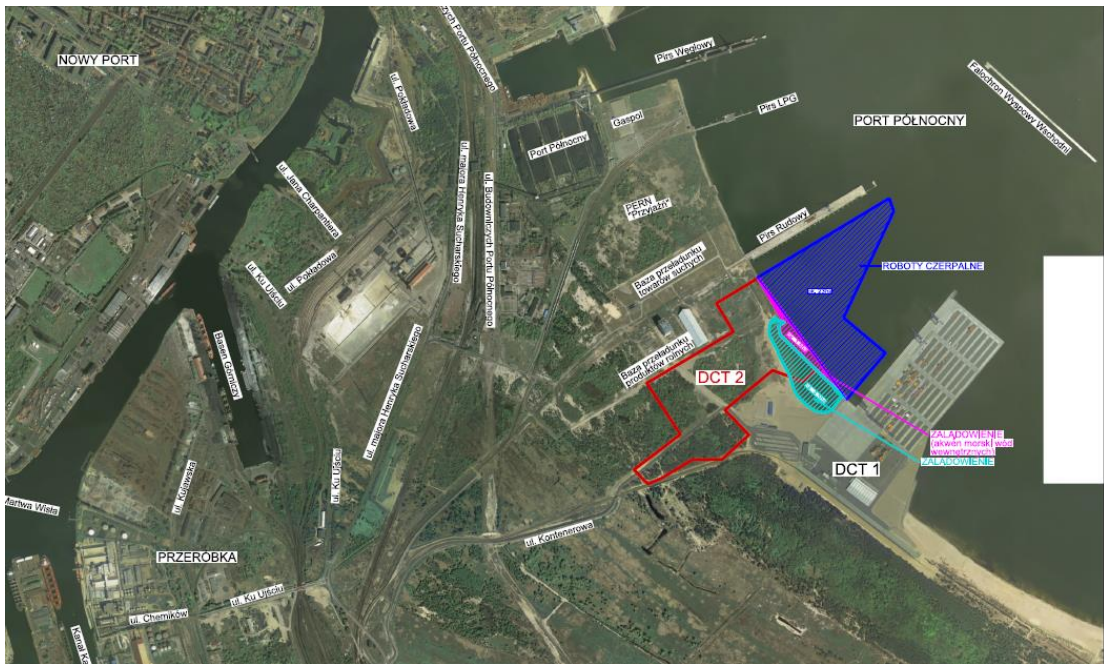


Figure 1. Key plan (source: Construction Design, Mott MacDonald 2014)

## 2.2. Project Status

The Project is at an intermediate stage of development. The concept study has been developed for the project. An environmental impact assessment for regulatory requirements has been undertaken. The Project has obtained the environmental consent. The decision determines environmental conditions for construction of new deepwater container terminal.

The schedule for further work is as follows:

- |   |                             |
|---|-----------------------------|
| • Obtaining a building permit   | August 2014                 |
| • Selection of a contractor   | June 2014                   |
| • Hand-over of the construction site /<br>commencement of the construction work | August 2014                 |
| • Completion of the construction work   | 3rd quarter of 2016         |
| • Commencement of the operation   | 3rd and 4th quarter of 2016 |

## 3. Legal requirements and standards for public consultation

### 3.1. Legal requirements for public consultation

According to Polish regulations, public consultation is included in the project development process where a given project may significantly affect the quality of the environment, and are part of the environmental impact assessment.

The most important pieces of Polish legislation concerning public participation in the decision-making process are as follows:

- The Constitution of the Republic of Poland of 2 April 1997 (Journal of Laws No 78, Item 483) which provides that a citizen shall have the right to obtain information on the activities of

organs of public authority; moreover, Article 74 thereof indicates that “everyone shall have the right to be informed of the quality of the environment and its protection”.

- Environmental Protection Act of 27 April 2001 (consolidated text: Journal of Laws of 2013, Item 647, as amended) which governed the rules for making available the information on the environment and the protection thereof, and the public participation in proceedings relating to environmental protection, pending the entry into force of the Act on the provision of information (...) of 3 October 2008 (consolidated text: Journal of Laws of 2013, Item 1235, as amended).
- Act on the provision of information on the environment and the protection thereof, the public participation in the environmental protection, and environmental impact assessments of 3 October 2008 (consolidated text: Journal of Laws of 2013, Item 1235, as amended) which lays down the rules and procedures to be followed in matters concerning making available the information on the environment and the protection thereof, and the rules for the public participation in the environmental protection.
- Act on spatial planning and development of 27 March 2003 (consolidated text: Journal of Laws of 2012, No 80, Item 717, as amended) which governs the manner of making public the information on preparing an area development plan.
- Act on specific rules for the preparation and implementation of investment projects concerning public roads (special-purpose Act) of 10 April 2003 (consolidated text: Journal of Laws of 2013, Item 687, as amended) which lays down the procedures to be followed when issuing decisions on a permit for implementation of a road-related investment project.
- Act on the municipality (*gmina*) self-government of 8 March 1990 (consolidated text: Journal of Laws of 2013, Item 59r, as amended) which lays down the rules for holding a consultation with municipality inhabitants.

International legal requirements for public consultation are specified in the following documents:

- Aarhus Convention – the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters. (Journal of Laws of 2003, No 78, Item 706); the Convention facilitates the participation of non-governmental organizations in the decision-making process; ensures that assessment-related procedures are followed; provides for the need for consultation and access to information; ensures the public participation in the preparation of environmental plans, programmes and guidelines, as well as in the preparation of regulations.
- Directive 2001/42/EC of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (OJ L 197, 21/07/2001) – imposes an obligation of the wide communication of adopted decisions, and making available documents in a form of plans and programmes, opinions, consultation outcomes, and justification for the selection from the perspective of alternative solutions.
- Directive 2003/35/EC of 26 May 2003 providing for public participation in respect of the drawing up of certain plans and programmes relating to the environment and amending with regard to public participation and access to justice Council Directives 85/337/EEC and 96/61/EC – ensures public participation with regard to individual decisions and programmes, ensures public participation at an early stage, ensures an opportunity for submitting comments and applications, and lays down the rules for participation of non-governmental environmental organizations.

Public participation is legally required by the EIA Regulation which includes provisions for public consultation and disclosure of project information during EIA procedure. Formal public consultation are carried out by the local authorities. Comments from the public should be directed for the period of 21 days after public announcement stating that the EIA application file has been submitted, the EIA process has commenced.

### 3.2. International standards for public consultation being applied by financial institutions

All Projects funded by the EBRD and IFC are required to meet best international practice and specifically the requirements for stakeholder engagement and public consultations, as specified in the EBRD Environmental and Social Policy (2008) and IFC Performance Standards on Environmental and Social Sustainability (2012). These requirements are described in detail in the EBRD Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement, and the IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts (alongside its associated Guidance Note 1)<sup>3</sup>.

In addition, the project-specific stakeholder engagement activities should be aligned with the EBRD's Public Information Policy of 2008 that elaborates on how the EBRD discloses information and consults with its stakeholders in order to promote better awareness and understanding of its strategies, policies and operations.

Information Disclosure and Stakeholder Engagement per the EBRD and IFC requirements is required to:

- identify people or communities that are or could be affected by the project (including vulnerable groups), as well as other interested parties;
- ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them, through a process of information disclosure and meaningful consultation; and
- maintain a constructive relationship with stakeholders on an on-going basis through meaningful engagement during project implementation.

The lenders' requirements towards the organization of the stakeholder consultations process for Category A projects, to which the proposed DCT Project refers largely due to its scale, are more extensive than those implemented under Polish law. There are a number of differences to point out:

- The stakeholder consultations are considered as an on-going process taking place during the whole life-cycle of the project; during this process it is necessary to both secure that the stakeholders are informed about environmental and social consequences of the project implementation and ensure the opportunity for feedback (collection and consideration of comments);
- A systematic identification of the stakeholders, as well as of their expectations and concerns is envisioned; special attention is paid to informing affected and vulnerable groups and involving them in consultations; it is recommended to pay special attention to vulnerable groups, whose livelihood or living conditions may be affected by the project realization; and
- It is essential to establish a mechanism for submitting and considering grievances of stakeholders.

## 4. Stakeholder engagement to date

Consultation undertaken to date includes obligatory consultation during the formal EIA procedure and additional prior EIA process. These already performed public consultations are briefly described in the following sections.

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<sup>3</sup> Other essential guidance includes the 2012 IFC's Access to Information Policy that defines general principles and approaches of the IFC with regard to information disclosure, and the 2007 IFC's Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.

## 4.1. Formal consultation

Implementation of the planned project requires that both the human and environmental factor be considered at the stages of strategies, plans or programmes. Therefore, it is necessary to hold public consultation and take decisions reducing the impact of projects being implemented on the environment.

Formal consultation being held by the local administration authority were conducted at the following stages:

- **Preparation of the Local Area Development Plan for the NORTHERN PORT II (*PORT PÓŁNOCNY II*) in Gdańsk. The Plan was adopted on 11 July 2002 by Resolution of the Council of the City of Gdańsk**
- **Procedure for the Project's Environmental Impact Assessment, prepared in the proceedings relating to the issue of a building permit for the Deepwater Container Terminal located within the Northern Port in Gdańsk (DCT 1). Assessment of the design details at the stage of consultation and approval of the Construction Design – October 2004**
- **Update of the Study of conditions and directions of spatial development for Gdańsk. The Study was adopted on 20 December 2007 by Resolution of the Council of the City of Gdańsk**
- **Work on the Regional Strategic Plan with regard to transport. The Plan was adopted on 04 July 2013**
- **Procedures for the Project's Environmental Impact Assessment and the issue of an Environmental Permit. The Environmental Impact Report is of October 2013. The Decision was issued on 28 March 2014.**

Both the inhabitants and other stakeholders have been aware of the planned construction work, and – later on – of the extension of the DCT Terminal. Moreover, the project has been acceptable from the beginning. In the consultation procedure for the most important document i.e. the Environmental Impact Report, no negative comments were submitted, and no conclusions likely to pose a threat to the project concerned were drawn.

## 4.2. Additional consultation

In addition to the formal public consultation being held as part of the process of adoption of official documents, the company has been involved in informing the public using numerous other communication channels:

- Press articles, *inter alia*:
  - „Kończą się przygotowania do budowy DCT II. Inwestycja ruszy jeszcze w tym roku” (*Site preliminaries for the construction of DCT II to be soon completed – the project's to be launched this year*), 25 February 2014 (<http://biznes.trójmiasto.pl>)
  - „Nowe bezpośrednie połączenie morskie Hongkong-Gdańsk” (*New direct link between Hong Kong and Gdańsk*), 28 January 2014 (<http://biznes.trójmiasto.pl>)
  - „Kolos w porcie, mało energetyczny debiut i... kłopoty z "kolebką". Rok 2013 w trójmiejskiej gospodarce” (*Colossus in the port, not-so-energetic debut, and... trouble with the Cradle – The year 2013 in the Tri-City's economy*), 31 December 2013 (<http://biznes.trójmiasto.pl>)
  - „Sztuczna wydma pomoże przetrwać nadbałtyckim roślinom” (*An artificial dune will help Baltic flora to survive*), 17 November 2013 (<http://www.naukawpolsce.pap.pl>)
  - „Pęłł milion w terminalu DCT” (*The first million in the DCT Terminal*), 18 November 2013 (<http://biznes.trójmiasto.pl>)



- „Alians P3 będzie zawijał do Gdańska. Kolejne kontenerowce w DCT” (*P3 Alliance will call in at the Gdańsk Port. New container ships in DCT*), 15 November 2013 (<http://biznes.trójmiasto.pl>)
- „Inwestorzy” z Trójmiasta zostali docenieni” (*Investors from Tri-City appreciated*), 25 October 2013 (<http://biznes.trójmiasto.pl>)
- Participation in conferences
  - Sending a registration form for the 2nd Scientific Conference: Zarządzanie operacyjne: teoria, praktyka i zastosowania (*Operational Management: theory, practice and applications*). The conference will be held on 23 and 24 October 2014.
  - III Ogólnopolska Konferencja Prawa Morskiego: MORZE BAŁTYCKIE – WSPÓLNE DOBRO EUROPY (*3rd Nationwide Maritime Law Conference: BALTIC SEA – EUROPE’S COMMON GOOD*), 27 February 2014
- Direct contacts with stakeholders:
  - The largest and most important social group that the investor has been communicating with is that of the inhabitants of the districts located in the closest vicinity i.e. Przeróbka and Stogi. Even though the project does not affect the group concerned, the Investor cares for the positive reception from the local inhabitants as regards the project.
  - Moreover, information campaigns with the participation of policepersons have been organized at the beach in Gdańsk Stogi, which mainly concerned the safety while moving in the industrial area. *Inter alia*, children from the primary school in Gdańsk Przeróbka have participated in those events. In addition to the safety-related educational activities, the so-called Green Schools have been organized for children from the abovementioned primary school. As part of the Green School activities, environmental issues have been raised, and knowledge has been shared on compensation measures, as well as on the protection of species of plants and birds occurring at the beach.
  - Another important group that has been communicated with is that of history and militaria enthusiasts. Those persons are involved in cleaning and rehabilitation of military structures located in the vicinity of the terminal. Due to the location of the terminal, some of those structures are going to be torn down. In order to conserve as many places of historical value as possible, it has been decided, along with the history enthusiasts, to establish an educational trail located in a forest adjacent to DCT.

## 5. Identification of stakeholders, and methods of communication

The list of stakeholders, as presented in this chapter, includes the identified social groups and persons that are associated, in different ways, with the Project implementation. Generally, the following may be distinguished:

- persons and social groups to be affected, directly or indirectly, by the outcomes of the Project implementation,
- persons and social groups that participate, in a specific manner, in the Project implementation,
- persons and social groups being able to influence and decide on both the outcomes and the manner of the Project implementation.

Stakeholders have been identified in accordance with the above classification.

**Table 1 Stakeholders – identification**

Stakeholders to be affected, directly or indirectly, by the outcomes of the Project implementation	Stakeholders that participate in the Project implementation	Stakeholders being able to influence and decide on the Project implementation
Inhabitants of both the city and municipality of Gdańsk Inhabitants of the terminal impact zone, in particular inhabitants of Stogi-Przeróbka district Inhabitants of towns/villages located along transport routes Local entrepreneurs Particularly vulnerable social groups (the elderly, the disabled, children) Non-governmental organizations (NGOs) operating at the local, regional, national and international level (including environmental organizations) Local inhabitant-supporting organizations Local mass media	DCT Gdańsk S.A. Servicing company / companies Construction and utility work / rough-in contractors Services and facilities suppliers Haulage companies Security agencies	State administration Self-government administration Sanitary Inspectorate Regional Director for Environmental Protection Environmental Protection Inspectorate Ministry of the Environment Ministry of Infrastructure and Development Ministry of Economy

## 5.1. Internal Stakeholders

The following categories of stakeholders have been identified as internal:

- Shareholders of the Company;
- Company employees: it is planned that Project realisation will create 1600 new work places; and
- Project internal stakeholders: sub-contractors, mainly at the construction stage.

## 5.2. External Stakeholders

The following categories of stakeholders have been identified as external:

- National and regional authorities responsible for permitting;
- Local self-government authorities;
- People living around the Project Area;
- Other Businesses (companies exploring minerals from the Baltic bottom, ships using Port of Gdansk);
- Vulnerable groups. This group of stakeholder may include:
  - Baltic Sea users dependant of access to Baltic Sea resources (such as fishermen);
  - Elderly people, disable, children for whom the Project area have recreational value;
  - Poor families living in the vicinity of the project area of influence<sup>4</sup> on which Project may have impact;

<sup>4</sup> Additional investigations are needed to reveal such families.

- Other stakeholders. These include environmental non-governmental organisations at international, national level and local level, military fans, community based organisations (to be further researched), cultural and mass media organisations, and educational institutions.

**Table 2 Stakeholders being able to influence and decide on both the outcomes and the manner of the Project implementation**

Stakeholders being able to influence and decide on both the outcomes and the manner of the Project implementation	
<b><u>Government and self-government administration authorities, control authorities</u></b>	<u>Regional Directorate for Environmental Protection in Gdańsk</u> ul. Chmielna 54/57, 80-748 Gdańsk, phone: +48 58 68 36 800
	<u>Provincial Sanitary and Epidemiological Station in Gdańsk</u> 80-211 Gdańsk, ul. Dębinki 4, phone: (+48) 58-344-73-0
	<u>Provincial Inspectorate for Environmental Protection in Gdańsk</u> Ul. Trakt św. Wojciecha 293, Gdańsk, phone: 58 309 49 11
	<u>Gdańsk City Office</u> ul. Nowe Ogrody 8/12, 80-803 Gdańsk, phone: Telephone exchange: +48 58 323 60 00
	<u>Maritime Office in Gdynia</u> ul. Chrzanowskiego 10, 81-338 Gdynia, phone: +48 (58) 355 33 33
<b><u>Ministries</u></b>	<u>Ministry of the Environment</u> 00-922 Warszawa, ul. Wawelska 52/54, Phone: 022 5792900
	<u>Ministry of Infrastructure and Development</u> ul. Wspólna 2/4, Warszawa, phone: 22 273 70 00
	<u>Ministry of Economy</u> 00-507 Warszawa, pl. Trzech Krzyży 3/5, phone: 022 6935000

**Table 3 Non-governmental organizations (NGOs) interested in the Project**

Non-governmental organizations (NGOs)	Operational profile	Name	Contact details
Nationwide or international organizations	Societies for Nature Protection associated with the preservation protection of nature i.e. flora, fauna, ecosystems and landscapes, and the broadly defined natural and environmental education.	The Polish Society for Nature Protection "Salamandra"	The Polish Society for Nature Protection "Salamandra" ul. Stolarska 7/3 60-788 Poznań phone/fax: (48) (61) 6628606 phone/fax: (48) (61) 8432160 email: biuro@salamandra.org.pl
	Greenpeace is an international non-governmental organization operating to the benefit of environmental protection. The organization focuses its actions on the most vital, both global and local, threats to the biodiversity and the environment	Greenpeace Polska	22 659 84 99 ul. Lirowa 13 02-387 Warszawa <a href="http://www.greenpeace.org/poland/pl/o-nas/kontakt/">http://www.greenpeace.org/poland/pl/o-nas/kontakt/</a>

Non-governmental organizations (NGOs)	Operational profile	Name	Contact details
Local non-governmental organizations (NGOs)	Web portal dedicated to the districts of Stogi, Przeróbka, Krakowiec, Górkki Zachodnie	Gdańsk's Practising Pedagogists Association Editorial office for the web portal stogi.info.pl	ul. Stryjewskiego 28 Phone: 0-508-812-323
	The district of Stogi is an auxiliary entity of the City of Gdańsk within the meaning of provisions of the Act of 8 March 1990 on the municipality ( <i>gmina</i> ) self-government, and the Statute of the City of Gdańsk	The District of Stogi Council	The District of Stogi Council ul. Stryjewskiego 23, 80-625 Gdańsk <a href="http://www.radaosiedlastogi.pl/kontakt">http://www.radaosiedlastogi.pl/kontakt</a>
Other	Internet-based forum for regional history enthusiasts, actively supporting, <i>inter alia</i> , the revitalization of historical structures and bunkers located in the vicinity of the terminal.	Forum.eksploracja.pl/	<a href="http://www.forum.eksploracja.pl/">http://www.forum.eksploracja.pl/</a>

Table 4 Addresses of local mass media and operating local newspapers

Newspaper / Mass media	Contact details
"Dziennik Bałtycki"	<b>Polska Dziennik Bałtycki</b> 80-894 Gdańsk Targ Drzewny 9/11 phone: 058 30 03 300 fax: 058 30 03 303 <a href="http://www.dziennikbaltycki.pl/">http://www.dziennikbaltycki.pl/</a>
"Nasze Miasto – Trójmiasto"	ul. Targ Drzewny 9/10 80-894 Gdańsk  <b>Editorial office:</b> <b>phone:</b> 58 300 33 20 <b>e-mail:</b> <a href="mailto:redakcja.trojmiasto@naszemiasto.pl">redakcja.trojmiasto@naszemiasto.pl</a> <a href="http://gdansk.naszemiasto.pl/">http://gdansk.naszemiasto.pl/</a>
"Gazeta Wyborcza – Trójmiasto"	ul. Tkacka 7/8 80-836 Gdańsk, phone: (58) 32 19 151, fax: (58) 32 19 006 <a href="mailto:redakcja@gdansk.agora.pl">redakcja@gdansk.agora.pl</a> <a href="http://trojmiasto.gazeta.pl">http://trojmiasto.gazeta.pl</a>

### 5.3. Stakeholder Concerns Analysis

The Company is committed to systematic collection and analysis of stakeholder expectations and concerns, as well as to taking appropriate responsive measures throughout the Project lifecycle.

Identified interests and concerns of the key stakeholder groups are presented in Table below.

**Tabela 5 Key stakeholders Expectations and Concern Analysis**

Stakeholder group	Key expectations	Key concerns	Recommendation
<b>External stakeholders</b>			
National and local authorities	The Project will allow complying with EU policy regarding Trans-European Transportation Network; Improvement of the quality of the environment through de-congestion of land transport routes, while intensifying the ship transport; Economical development of the region; Increased revenues via stable taxes; Improved labour conditions; Social investment program.	Environmental deterioration; Failure to comply with the national requirements.	Continue with consultations and dialogue.
In particular, environmental and safety controlling and supervision bodies	Strict compliance with the national legislation		Continue with / engage in consultations and dialogue.
Residential areas in the vicinity of the Project	Creation of new workplaces; Meeting the requirements of the environmental legislation; Monitoring and mitigation of any environmental problems that may emerge in the future; Benefits from Social investment programs (mechanism to be developed).	Social and environmental issues	Continue with consultations; repeatedly explain the Project plans. Work further to identify and manage issues / expectations. Held meetings with community leaders and residents. Inform the communities of the Project progress.
Local businesses	Development associated with Project realisation or compensation for any losses;	Loss of income; Lack of compensation for loss;	Continue consultations; clarify the potential for local business development/loss.
Vulnerable groups	To be identified/analysed	Changes in the routine lifestyle To be identified/analysed	Further analysis is needed
NGOs and other e.g. military fans	Improvements in the quality of the environment in the region. Meeting the legal requirements; Appropriate compensation measures.	Transparency of the decision-making and communication processes. Compliance with regulations	Maintain an open-door approach with those who have concerns with respect to the Project construction and operation.
<b>Internal stakeholders</b>			
Shareholders of the Company	Project implementation as planned	Project failure / closure	Continue with consultations and dialogue.
Company employees	Retention of employment; Improved working conditions.	Job losses; Transparency of recruitment policy	Communicate the labour policy early in the process; Establish incentives.
Sub-contractors	Employment opportunity	Transparency of tendering and contracting policy	Communicate the labour and contracting policy early in the process.

## 5.4. Communication methods

Manners of communication with stakeholders are provided below.

**Table 6 Methods of stakeholders' communication**

Stakeholders group	Means of communication	Rules for communication
Stakeholders to be affected, directly or indirectly, by the outcomes of the Project implementation	Company Office Company's website Public Information Bulletin (BIP) of the City Office Notice boards	In accordance with legal requirements and the local custom Direct communication (office), indirect through announcements issued to the public
Stakeholders (internal) that participate in the Project implementation	Exchange of correspondence, meetings	In accordance with the rules for internal communication, meetings and the grievance mechanism for workers (employees and contract labour suppliers)
Local entrepreneurs	Direct meetings, DCT's website	During the environmental procedure, and at the request / on demand. In accordance with the rules for internal communication, and the accepted custom
Particularly vulnerable social groups (the elderly, the disabled, children)	Consultation meetings – providing information, exchange of documentation and correspondence associated with projects. School workshops.	In accordance with the rules for internal communication, and the accepted custom. Direct communication (office), indirect through announcements issued to the public
Stakeholders (external) that participate in the Project implementation	Exchange of correspondence, meetings, training courses, design supervision	In accordance with provisions of an Agreement as concluded by and between DCT and a given organization
Local and regional administration and self-government authorities	Consultation meetings – providing information, exchange of documentation and correspondence associated with projects	During the consensus procedure – in accordance with administrative procedure requirements
State administration authorities, Ministries	Official letters	In accordance with administrative procedure requirements
Non-governmental organizations (NGOs) interested in the Project	Direct meetings, DCT's website	During the environmental procedure, and at the request / on demand.
Mass media	Exchange of correspondence, meetings, transfer of announcements, information and educational articles, etc.	In accordance with the rules for internal communication, and the accepted custom

## 6. Making available information

Making available information on the project allows stakeholders to get to know and understand both the environmental and social risks and impacts associated with the project, as well as opportunities provided by the project.

DCT's intention is to present the terminal construction design as an example of good practice of the implementation of port infrastructure projects, including stakeholder engagement and maintaining good communication throughout the duration of the project. The Investor cares for the project not to arouse negative emotions, and to benefit the local community.

In accordance with this approach, the aim of making available information and the communication will be:

- to provide the local community with information on the schedule and scope of the planned work, along with the manner of collection opinions thereof,
- to publish the company's commitment to apply best practices with regard to environmental protection and occupational safety of employees and subcontractors,
- to publish the mechanism for submitting comments and complaints (grievance mechanism), allowing the collection of negative opinions and taking corrective measures.

In order to ensure transparency and availability of information on the project implementation at all stages thereof, including site preliminaries, construction and operation, DCT's authorities will take the following measures:

- Further meetings with stakeholder groups – representatives of history enthusiasts, and meetings with councillors of districts adjacent to DCT
- Cooperation with the primary school in Gdańsk Przeróbka
- Making available up-to-date information on the project in a tab on the DCT's website: <http://dctgdansk.pl>.
- Information on the most important events associated with the project implementation will also be made available:
  - in local newspapers,
  - in the site office,
  - on the website, the following document will be provided: non-technical summary (NTS), stakeholder engagement plan (SEP), grievance mechanism.

Moreover, the stakeholders directly involved in the project implementation will have an access to the following information:

- information about particular stages of construction process,
- Environmental Impact Report, and results of environmental analyses,
- Environmental Permit, and the building permit.

## 7. Grievance mechanism

The aim of the grievance mechanism is to ensure that all comments, enquiries and complaints concerning the project will be examined, and that appropriate corrective measures will be taken.

DCT personnel to be involved in the grievance mechanism implementation will complete appropriate training, in particular relating to handling the stakeholders' opinions, and the manners of providing information.

The flowchart for the system operation, and the grievance form, are provided in Appendices.

The following time-frame will be applied:

- Written confirmation of receipt of a comment/complaint: within 5 business days of receipt
- Written provision of an answer / proposed solution: within up to 4 weeks of receipt of the comment / complaint.

As regards the project in question, the procedure will additionally include:

- Information on the project will be published in a separate tab on the DCT's website: <http://dctgdansk.pl>, along with a link to the grievance form.
- Information on the project, including a general description of the project, stages of the implementation thereof, and information on the grievance mechanism, will be published and made available in a form of a brochure.
- Information on the submitted comments / complaints will be provided on the project's website.
- DCT will appoint a person responsible for management of the submitted comments, and the communication with the public.
- Information on the project as published in the information brochure and on the website will be available in Polish.

Contractors / subcontractors being involved in the construction process will be informed by DCT of their role in the grievance mechanism, and of the need for the implementation thereof for their employees.

In order to ensure the assessment of the mechanism's efficiency, internal audits of the operation thereof will be carried out periodically.

Moreover, external audits of the grievance mechanisms will be carried out periodically by independent organizations (of auditors).

Grievance forms will be available in both Polish and English, will be provided on websites, and will be directed to the Municipality Office, along with the description of the procedure of the use thereof.



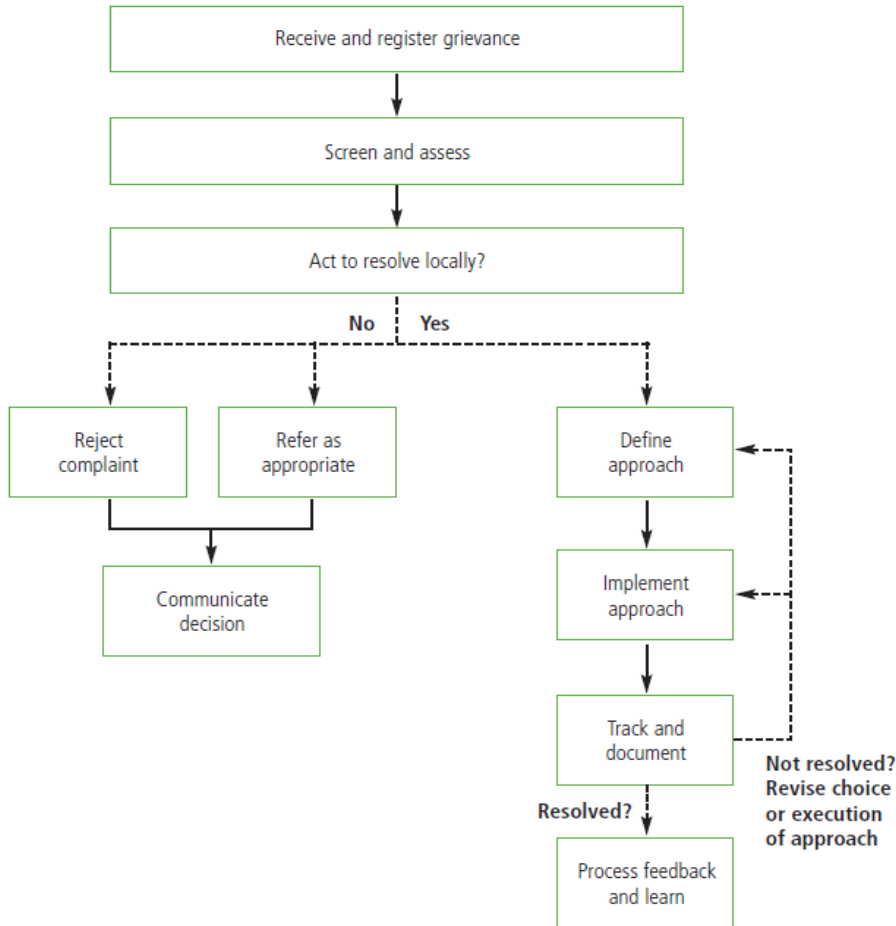


Figure 2. Grievance mechanism

## 8. Stakeholder engagement programme

### 8.1. Stakeholder engagement programme

In order to ensure transparency and access to information relating to the project, DCT will take the following measures for the implementation of stakeholder engagement plan:

- **The company’s website:** the company’s website will be available to all Project partners, and will be used by DCT for making available information on the project, basic assessments, reports, etc. The website will provide information concerning such issues as improvement of the road quality, and the construction details. Access to the feedback on the project, and to the grievance mechanism, will be ensured.
- **Bulletins** will be prepared and made available in the Project office and the Municipality Office. The Bulletins will include important information on the project, any possible inconveniences to the inhabitants and the traffic during the construction. They will also provide information on the contact with DCT, as well as details of the possibility of access to the Grievance Mechanism.
- **Participation in events in the municipality** in order to ensure involvement in all local occurrences and initiatives.
- **Public consultation and direct meetings** with stakeholders.

- **Public meetings** – such as the organization of the ceremonial inauguration of the terminal, and other special events.
- **Notice boards**, on which the most up-to-date information on the Project developments, and the possible inconveniences to the local population, will be displayed.
- **Project / site office**, in which an opportunity to submit comments / complaints, as well as access to the Project documentation, will be provided.
- **Communication through employees and contractors** – information meetings about the most important risks and impacts.
- **Placing of information signs** concerning the existing risks associated with the project implementation.
- **Reports of the post-development analyses and monitoring** will be published and/or forwarded to appropriate authorities / institutions in accordance with national and international regulations.
- **Grievance mechanism** – implementation of the internal and external grievance mechanism.
- **Supporting local measures associated with the improvement of the quality of living and the environment** through, *inter alia*, co-financing of educational institutions, or participating in the costs of environmental projects.

Table 7 Stakeholder engagement programme

Stakeholder group	Engagement method	Materials to be used	Location	Responsible organisation, person	Date
<b>External stakeholders</b>					
All external stakeholders: All-level authorities Local communities Vulnerable groups Other parties: NGOs, educational, mass media and community based organizations, etc.	Inform on the project implementation status, collect opinions and concerns during annual public meetings; Post news on the Company's website; Register, analyse and address comments submitted online	Presentations; Booklets and progress leaflets; Online news	Library or other public facilities having adequate space.	Company Project Team / Stakeholder Management Team / Communications Department	Annually during construction
Local authorities	Organize open doors and annual meetings; Inform of the taken on commitments via sharing the approved ESAP; Submit annual reports and ask for feedback.	Presentations / reports	Project site, Company offices, authorities' office	Project team and Communications Department	Annually during construction and operation
National and regional authorities, in particular, environmental and safety controlling and supervision bodies	Inform of the taken on commitments via sharing the approved ESAP; Submit annual reports and ask for feedback	Presentations / reports	Project site, Company offices, authorities' office	Project team and Communications Department	Annually during construction and operation
Local communities and vulnerable groups	Analyse the local socio-economic conditions in the project area of influence, focus on vulnerable groups	Project description and general impacts at community level	Community settlements	Representative of the Company / Consultant	Two months after signing the loan agreement
	Consult the local communities about their views/opinion on project implementation and impacts provided via grievance mechanism and target group meetings, as necessary.	Relevant Project documentation; Public grievance forms (distributed, published in the local media, posted on the Company's web-site for printing out / downloading / electronic submitting)	Company's representative visiting communities' settlements	Stakeholder Management Team / Communications	Annually / Ad-hoc meetings as needed
Other parties: NGOs, cultural, educational, mass media and community based organizations, military fans etc.	Individual meetings (on specific matters) Email or phone communication (to be properly registered)	Booklets and progress leaflets	Project site, Company offices	Company representative; Project team; Communications Department	Ad-hoc meetings / communication, as needed
<b>Infernal stakeholders</b>					
Shareholders of the Company	Inform, consult, and involve in strategic decision making processes via constant reporting on project implementation status, annual reports and direct meetings and shareholders board meetings	All reports and official documents; Project development status	Company or shareholders headquarters	Company management	On-going

Stakeholder engagement plan



Company employees	Inform of the Company Project plans in relation to labour issues; actual impacts on the local communities; Inform on the internal Project development issues, success and difficulties	Leaflets, Presentations, Newsletters	Project site, Company office	Project team and communication	Quarterly during construction and operation
Contractors	Inform via direct meetings and reporting	Monthly reports are to be received from contracts about project progress Monitoring reports are to be prepare together with the contractors	The Company office and/or contractors office	Company's representative / Contractor's representative	Monthly / Annually
Employees of the contractors	Inform the employees and contractors about labours and safety issues via direct meetings and information notes	Human resources policy and grievance mechanism; safety and environmental policy and rules; method statements	Construction camps / Contractors' office	Company's EHS officer	During construction, when contracting the construction companies

## 8.2. Stakeholder engagement schedule

Table 8 Stakeholder engagement schedule

Stage of the Project	Schedule	Measures
Preparation and obtaining of permits	Implementation of the stakeholder engagement plan As from the submission of documentation – on an ongoing basis	Making publicly available of the NTS, SEP Launching the grievance mechanism Informing of the course of proceedings as regards Environmental Impact Assessment and obtaining the building permit
Construction	A minimum of 30 days prior to the commencement of construction work  Commissioning and hand-over to operation	Information for municipalities, enterprises and inhabitants prior to the commencement of construction work, and reminding of the contact details and the grievance procedure – information in local newspapers. Establishing rules for submitting comments for the construction firm employees. Information for municipalities and inhabitants, information in local newspapers.
Operation	Post-development environmental monitoring	Forwarding the results to the competent authorities – in accordance with the existing regulations – and publishing of relevant information on the website.

## 9. DCT Gdańsk – Contact details

Comments during the disclosure period should be returned to **Jadwiga Grabowska, PR Specialist/Spokesman**. Contact details are given below:

### Jadwiga Grabowska, Spokesperson

Phone: (+48) 609 700 495  
jadwiga.grabowska@dctgdansk.com

<http://dctgdansk.pl>

DCT Gdańsk SA  
ul. Kontenerowa 7  
80-601 Gdańsk, Poland

# Appendices

# Appendix A. Grievance form

<b>Case No:</b>	
<b>First name and surname</b> <i>NB: a comment may be submitted anonymously, or non-disclosure of the applicant's data to third parties without the applicant's consent may be demanded</i>	<b>Applicant's first name</b> _____  <b>Applicant's surname</b> _____  <input type="checkbox"/> I wish to submit a complaint anonymously <input type="checkbox"/> I demand that my personal details be not disclosed without my consent
<b>Contact details</b> <b>Please indicate how the applicant should be contacted (by e-mail, by phone, or by post).</b>	<input type="checkbox"/> <b>By post (please enter the correspondence address):</b> _____ _____  <input type="checkbox"/> <b>By phone:</b> _____  <input type="checkbox"/> <b>E-mail</b> _____
<b>Preferred language for communication</b>	<input type="checkbox"/> <b>Polish</b>  <input type="checkbox"/> <b>English</b>  <input type="checkbox"/> <b>Other (please specify)</b> .....
<b>Description of the subject of the case / compliant:</b> The subject of the case / complaint; when did the case occur?; provide the location relating to the case / complaint; list the persons involved in the case; what are the effects of the ensuing situation?  _____  _____	
<b>Date of the incident / occurrence of the subject of the complaint / emergence of the case</b>	<input type="checkbox"/> <b>One-time incident / complaint (date _____)</b>  <input type="checkbox"/> <b>Happened more than once (Indicate how many times: _____)</b>  <input type="checkbox"/> <b>Ongoing (a currently existing problem)</b>
<b>According to the applicant, what measures would provide solution to the problem?</b>  _____  _____	

signature: \_\_\_\_\_

Date: \_\_\_\_\_

Please forward this form to: [name], [company name],

Address \_\_\_\_\_: Phone: \_\_\_\_\_ or E-mail: \_\_\_\_\_@\_\_\_\_\_.com .

**Jadwiga Ronikier**  
Atkins  
ul. Bonifraterska 17  
00-203  
Warszawa

**jadwiga.ronikier@atkinsglobal.pl**  
**+48222460721**

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