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1. Introduction

This document presents an Environmental and Social Action Plan (ESAP) for an expansion of DCT Gdansk SA ("DCT" or the "Client") - the construction of new deep-water port infrastructure, Terminal 3 ("T3"). (the Projects), which EBRD is considering financing.

The Owner of the Projects is DCT Gdańsk. DCT has tendered for an EPC Contractor to undertake detailed design and construction.

Environmental Impact Assessment was developed in 2018 in line with the national EIA requirements and has been approved by the local environmental authorities in 2019. In 2022 a Supplementary Information Package (SIP) assessing impact relating to capital dredging works, Stogi beach morphology, sea water quality, as well as social and biodiversity issues was developed by Arup. The EIA and the SIP identify environmental and social risks and impacts during construction and operation.

Detailed recommendations made in the EIA and SIP reports are articulated into this ESAP. The ESAP is anticipated to form part of the financing documentation and will be monitored throughout the life of EBRD's financing.

1.1 Discharge of this ESAP

The timetable requires completion and acceptance of the deliverable / action by Lenders/Lenders representative by the milestone specified.

2. Environmental & Social Action Plan

Abbreviations used:

CESMP	Construction Environmental and Social Management Plan
CHA	Critical Habitat Assessment
DCT	Deepwater Container Terminal
DMP	Dredging Management Plan
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EHS	Environment, Health and Safety

EHSS	Environment, Health and Safety and Social
EPC	Engineering, Procurement, and Construction
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management System
IMS	Integrated Management System
EU	European Union
GET	Green Economy Transition
HR	Human Resources
H&S	Health and Safety
ISO	International Standards Organisation
LTA	Lenders Technical Advisor
MMA	Marine Mammals Observers
OHS	Occupational Health and Safety
O&M	Operations and Maintenance
PAM	Passive Acoustic Monitoring
PR	EBRD Performance Requirement
SEP	Stakeholder Engagement Plan
SIP	Supplementary Information Package
TMP	Traffic Management Plan

Construction Phase

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	**Assessment and Management of Environmental and Social Impacts and Issues**						
1.1	Integrate the Project and EBRD requirements into DCT Gdańsk Integrated Management System (IMS) that is certified to ISO14001, ISO 45001 and ISO9001 standards. The DCT Policies, procedures, and work instructions which form part of the DCT Integrated Management System should be fully implemented. Adherence to IMS to be formally monitored for the T3 Project by DCT E&S Staff..	Management of E&S impacts and risks as part of existing management system. Improved and continual improvement of environmental, social, health and safety performance Harmonised performance across company employees and contractors.	PR1 Good international practice	DCT Gdańsk management time	Within 3 months of Financial Close.	Scope of management systems incorporate T3 Project. Record of internal audits.	Open
1.2	Prepare and submit to the EBRD Environmental and Social Report on the status of this ESAP implementation and ongoing Environmental Health Safety	Compliance with Applicable regulatory and Lenders Requirements. Monitoring of ESAP implementation and EHSS performance.	Financing requirement	DCT management time	6 monthly E&S Reports with ESAP update during construction, commissioning	Environmental and social reports (template to be provided by the EBRD) and ESAP progress updates received.	Open

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	and Social (EHSS) performance.				and first year of operations. Annual reports thereafter throughout EBRD loan tenure.	Reports and progress against this ESAP satisfactory to the EBRD..	
1.3	The Supervision Engineer to include in its management teams suitably qualified and experience environmental, health and safety and social specialists, with experience of working with management systems and at large infrastructure projects	Effective management of environmental and social risks. Improved E&S performance	EBRD PR1 Good practice	The Supervision Engineer.	Prior to commencement of services for DCT.	Roles included in the organisation chart of the Supervising Engineer team. Job descriptions for the environmental, health and safety and social specialists are in place.	Open
1.3a	The EPC Contractor to include in its management teams suitably qualified and experience environmental, health and safety and social specialists, with experience of working with management systems and at large infrastructure projects.	Effective management of environmental and social risks. Improved E&S performance	EBRD PR1 Good practice	EPC Contractor.	Prior to commencement of services for DCT.	Roles included in the organisation chart the EPC Contractor. Job descriptions for the environmental, health and safety and social specialists are in place.	Open
1.4	DCT to appoint Lenders Technical and Environmental and Social Advisor. LTA team to include suitably qualified and experienced specialists	Effective management of environmental and social risks. Improved E&S performance	EBRD PR1 Good practice	DCT	After financial close	LTA will review relevant project documentation (CESMP and other management plans, monitoring results),	

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	to monitor the project against this ESAP and EBRD PRs. TOR to be agreed with EBRD.					undertake site visits on 6 monthly bases during project construction and first year of operation.	
1.5	Establish and maintain a Permit Register that will include: - Table of permits required, associated activity/asset, authorising body, timing, responsibility for application, application/approval status, expiry dates. -Copy of each permit - Details of any approval / permit conditions, including responsibilities for discharging these and status.	Compliance with regulatory permits and approvals	PR1 Legal requirements	EPC Contractor. DCT management time – if relevant for permits to be secured by DCT.	Prior to first access of site	All required permits obtained, and conditions complied with Register of permits is maintained Permit and approval conditions discharged.	Open
1.6	Apply existing DCT Change Management Plan to capture any future design/process/ strategy changes at the Project level. Ensure design and methodology changes are assessed with regards to	E&S risks and impacts of changes	PR1 Good international practice	EPC Contractor DCT Gdansk management time.	When a change occurs.	Record of E&S screening and E&S assessments of the Project changes. Any changes in the design/process/ strategy should be assessed against	Open

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	their potential environmental and social impacts.					relevant local, EU and Lenders E&S requirements, and Supplementary E&S Impact Assessment prepared for such changes to inform the existing assessment.	
1.7	Prepare Construction Environmental and Social Management Plan (CESMP) in line with national requirements, Lender's requirements, conditions of the Environmental Permit and specific mitigation measures identified in the EIA and SIP. Submit CEMP for approval by Supervision Engineer and lenders Technical and E&S Advisor. CESMP should include: -Waste Management Plan -Health and Safety Management Plan to ensure appropriate mitigation, management, monitoring and reporting of occupational health and	Management of E&S impacts and risks	PR1, PR2, PR3, PR4, PR5, PR6, PR8 and PR10 Good international practice (e.g., IFC 2014 (for Construction) and 2015 (General) Environmental and Social Management System Implementation Handbook; World Bank EHS Guidelines and others, as relevant)	EPC Contractor time	Prior commencing of construction work	CESMP in place and approved by Supervision Engineer and lenders Technical and E&S Advisor.r. Evidence of implementation via (a) Contractor and DCT Self-Monitoring Reports (b) Inspection and audit records (c) training records (d) accident, incident and investigation records (e) monitoring records. (f) Grievance records Revisions of CEMP as appropriate.	Open

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	safety issues associated with the Project during the construction, operation and closure phases. The HSMS should be aligned with international best practice such as ISO 45001; -Pollution Prevention Plan -Traffic Management Plan (see item 4.1 of this ESAP) -Dredging Management Plan (see item 3.1-3.4 of this ESAP) -Environmental and Social Monitoring Plan (see item 1.10 of this ESAP) -Biodiversity Management Plan (see item 6.1 of this ESAP) --Labour Management Plan (describing in details approach to managing the workforce in accordance with EBRD PR2) -Commitment Register (see item 1.8 of this ESAP) ESHS Reporting matrix containing clearly defined						

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	performance indicators and progress information. Regularly audit construction activities against CESMP. Updated CESMP accordingly to the progress of works, any design/ method changes, findings of audits/ inspections/ monitoring results.						
1.8	Based on a draft version, prepared by the ESDD Consultant finalise, maintain, and implement the Commitment Register. Commitment Register to form a part of the EPC Contractor CESMP, and to be incorporated (for example by referencing it) to DCT IMS.	Management of E&S impacts and risks	PR1, PR2, PR3, PR4, PR5, PR6, PR8 and PR10 Polish legal framework	DCT management time EPC Contractor time	Prior commencing of construction work	Commitment Register tracker with relevant evidence available for review.	Open
1.9	As a part of T3 project integration into DCT IMS, develop and implement procedure / process that will ensure that all Contractors and sub-contractors involved in T3 Project follow EBRD requirements relating to	Management of environmental, social, health & safety risks and opportunities. Improved and continual improvement of environmental,	PR1 Good international practice	DCT Gdańsk management time	As soon as practically possible but to be implemented prior to Contractors' engagement on T3 Project.	A procedure / process in place and integrated with DCT IMS.	Open

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	OHS, Labour management and this ESAP. DCT requirements should be clearly communicated to the relevant contractors and adherence by contractors should be formally monitored for the T3 Project (see also item 2.1 of this ESAP item).	social, health and safety performance Harmonised performance across company employees and contractors.					
1.10	Based on requirements of the Environmental Decision and Supplementary Information Package prepare and update periodically (as needed) and implement E&S construction and operation monitoring plan. Required monitoring includes, among others: -Air quality and Noise monitoring (including measurements in the months when hotels and guesthouses in the vicinity of the port are operational) -Archaeological supervision during dredging activities (as required by Environmental Decision, 2019)	E&S Impact Management	EBRD PR1, 2, 3, 4, 5, 6, 10	EPC Contractor internal resources (monitoring and reporting) DCT internal resources (social monitoring)	Monitoring Plan updated by the EPC Contractor prior to commencement of construction works, reassessed as required and implemented during the course of the construction phase to reflect ongoing works and reporting as per E&S Monitoring Plan.	Results of monitoring are gathered and presented in Reports to the EBRD / Supervising Engineer. Social monitoring to include tracking of -Statistic information on beach goers (monthly) -Visual observations of beach attendance (monthly) -Media analysis, grievance register	Open

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	-Biodiversity Monitoring -Monitoring required during dredging activities -Social Monitoring (including regular media search and updates from local authorities, updates from the grievance management register, and visual inspections)					-Actions undertaken in case of exceedances of limits value.	
1.11	DCT and / or the Supervision Engineer to monitor contractors' and suppliers' performance in the area of environmental, H&S, labour and HR issues in line with EBRD PR1 through inspections and audits. Monitoring to be performed monthly.	E&S Impact Management. Ensure that all aspects of the Project, including those delivered by sub-contractors are in compliance with the EBRD requirements	EBRD PR1, 2, 3, 4, 5, 6, 10	DCT internal resources Supervising Engineer	Monitoring to be performed monthly.	DCT's Reports issued to the EBRD every 6 months during construction and the first year of operation and annually during operation	Open
PR2	**Labour and Working Conditions**						
2.1	Assign responsibilities to the DCT HR team specialist for monitoring EPC Contractors' compliance with national labour and EBRD PR2 requirements.	Management of environmental, labour, OHS risks and opportunities.	National Labour Law; PR2, Best practice DCT HR Policy	DCT Gdansk internal resources	During construction and operations	Human Resources supervisor is appointed to monitor EPC Contractor.	Open

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	Conduct spot checks, joint inspections and site visits to check adherence to national labour laws.					Records of labour audits and site inspections undertaken.	
2.2	Enhance the procurement process, through additional assessment of risks of forced and child labour into DCT's procurement procedure. Include forced and child labour risk assessment into the scope of the Third party inspections conducted on suppliers' facilities. Request that Suppliers sign the DCT Code of Conduct and express commitments to avoid forced and child labour in their respective supply chains.	Minimise risk of child labour and forced labour being used in a core supply chain.	EBRD PR2	DCT internal resources. EPC Contractor Internal resources	During tendering and procurement process	Record of consideration of risk of child labour and forced labour being used in the production of equipment and infrastructure procured for the T3. Reports from third party inspections of production / manufacturing facilities. Code of Conduct signed by suppliers	Open
2.3	Communicate and implement the DCT existing worker grievance mechanism on the whole Project - make the DCT grievance mechanism applicable to all workers involved in T3 expansion.	Worker grievances resolved timely. Workers satisfactions. Minimising risk of workers conflicts.	PR2 Best practice	DCT internal resources.	Prior to first access of site by EPC Contractor and ongoing through construction	Grievance records and evidence of grievance collection and resolution Worker satisfaction / labour claims	Open

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PR3	**Resource Efficiency and Pollution Prevention and Control**						
3.1	Fill material to be sourced from existing, operational and permitted offshore borrow sites or quarries. DCT will review Contractor's method statement for the sourcing of material and the operational and environmental permits of the borrow sites or quarries sites.	Optimisation of material usage Reducing risks of pollution Minimising impact on environment	EBRD PR3 WBG EHS Guidelines HELCOM Guidelines	EPC Contractor	Prior to dredging and land reclamation activities commencement.	Record of review by DCT/ DCT's Supervision Engineer	Open
3.2	Undertake additional sampling of material to be dredged to comply with Helcom Guidelines (2015)for the characterisation of the material to be dredged on site. Prepare national EIA and application for permit for offshore disposal	Optimisation of beneficial use of dredged material Reducing risks of pollution Minimising impact on environment	HELCOM Guidelines National EIA and Environmental Decision Ordinance on the procedure for issuing permits for the disposal of dredging output at sea and for dumping waste or other substances at sea (Minister of Transport and Construction, 2006).	EPC Contractor	Prior to dredging and land reclamation activities commencement	Record of sampling results. Samples are characterised by an accredited laboratory for their physical, chemical, biological, and engineering properties. Evaluation of dredged materials behaviour, and potential for their reuse or appropriate disposal at sea submitted for review to Lenders Technical and E&S Advisor.	Open

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						If material will be disposed at sea evidence of the required national EIA and relevant permit for disposal at sea complaint with national legislation and Helcom requirements.	
3.3	Prepare and implement a Dredging Management Plan (DMP) taking into account the recommendations which are included in the 'Assessment of impacts on marine environment related to capital dredging, Stogi beach morphology and water quality' (Arup, 2022). The DMP shall include: - Monitoring strategy to inform baseline data and trigger levels prior to dredging and reclamation works commencing (water	Optimisation of beneficial use of dredged material Reducing risks of pollution Minimising impact on environment	EBRD PR3 WBG EHS Guidelines Best practice	EPC Contractor resources Implementation resources/ costs dependant on the extent of dredging scope, the EPC Contractor's dredging and land reclamation methodology and programme/ phasing of dredging and land reclamation works)	Prior to dredging and land reclamation activities commencement	Dredging Management Plan in place and approved by DCT/ DCT's Supervising Engineer and Lenders' Technical and E&S Advisor. Evidence of DMP implementation including monitoring results, evidence of actions undertaken	Open

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	quality, sediment quality – as per 3.2) - Monitoring strategy during dredging and reclamation works (water quality, sediment quality - sampling from hopper, aerial photography) - Proposed mitigation measures to control release of sediments and potential contaminants and turbidity during dredging and reclamation works and offshore disposal - Visual monitoring of the sediment plume produced during dredging should be conducted to ensure it does not reach the Vistula River Mouth Ramsar site.						

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3.4	Incorporate and implement a long-term monitoring strategy at the Company level IMS taking into account the recommendations included in the 'Assessment of impacts on marine environment related to capital dredging, Stogi beach morphology and water quality' (Arup, 2022). The strategy should include -Eutrophication monitoring – as per specification prepared by EPC/Dredging Contractor -Beach morphology monitoring - topographic survey undertaken annually after the baseline survey for 8 years (from baseline). Analysis of these surveys will help to identify trends in accretion and erosion of Stogi beach. Annual frequency to be re-assessed after two years following the	Reducing risks of pollution Minimising impacts on environment	EBRD PR3 WBG EHS Guidelines Best practice	DCT resources	During construction (as indicated in the DMP) and operation	Monitoring strategy is in place Record of implementation including monitoring results, and evidence of actions undertaken.	Open

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	completion of T3 reclamation. -Marine Litter Monitoring - 1 survey every 3 months from the commencement of Dredging Phase for 5 years						
3.5	All construction equipment should have relevant CE certifications confirming its compliance with Directive 2000/14/EC. DCT to verify such compliance with CE on spot check basis.	Reducing risks of pollution Minimising impact on environment	EBRD PR3, Directive 2000/14/EC of the European Parliament and of the Council of 8 May 2000 on the approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors and other relevant legislation pertinent to CE certification	DCT resources	Throughout Construction stage	Records of spot checks. Confirmation through Lenders Technical and E&S Advisor review/ site audits.	Open
3.6	To ensure Project's resilience to climate changes implement mitigation measures – as specified in the Climate Resilience Review (WSP, April 2022). Measures include design and maintenance measures and measures relating to	Reducing climate change impact on Project components.	EBRD PR3 EBRD Green Economy Transition (GET) approach Best practice, such as PIANC WG 178 Climate Change Adaptation Planning	DCT resources EPC Contractor resources	During construction and operation	Policies are in place Responsibilities to deal with physical climate risk should be defined and assigned to the team members	Open

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	construction site / workers and are developed to mitigate extreme temperature events, extreme rainfall and wind events, sea level rise etc. Among others: -Policies should be implemented defining weather conditions in which future outdoor working should not be attempted, including maximum temperature; -Appropriate severe weather and business continuity plans should be in place -A climate risk team with adequate resources, executive sponsorship and authority to oversee, coordinate and manage the physical climate related impacts should be established -A climate resilience training curriculum should be tailored to build workers' expertise and capabilities for dealing with physical climate risks		for Ports and Inland Waterways (2020)			Maintenance schedule and inspections reports are in place Detailed actions arising from Climate Resilience Review (WSP, April 2022) should be captured in the Commitment Register and in the DCT IMS (as per item 1.1)	

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PR4	**Health and Safety**						
4.1	CESMP to be developed by the EPC Contractor shall include traffic management plan (TMP) associated with transportation activities and routes to be used during construction, ensuring compliance with the national traffic and road safety regulation.	Occupational and community health and safety management during construction	PR4 Good international practice including but not limited to World Bank General EHS Guidelines, ISO 45001, EU Directive 89/391/EEC Legislative requirements	EPC Contractor resources	Once the full scale of material needed for land reclamation from any land sources (e.g., quarries, if any) becomes known	Traffic Management Plan is developed as part of CESMP by EPC Contractor and approved by the DCT / Supervising Engineer.	Open
PR5	**Land Acquisition, Involuntary Resettlement and Economic Displacement**						
5.1	Provide timely information about project implementation phases to the public and local communities to ensure the beachgoers and the businesses are aware of the upcoming activities and impacts on the beach. Monitor and assess whether permanent changes in the visual landscape impact the attractiveness of the beach and consider supporting	Avoiding economic displacement	PR5 Good international practice	DCT Gdańsk own resources.	Monitoring to be performed monthly	Monitoring Report, including grievances, community events and other mitigation measures taken.	Open

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	activities that attract beachgoers to the beach.						
PR6	**Biodiversity and Living Natural Resources**						
6.1	Based on the EIA and Critical Habitat Assessment (CHA) and supporting Mitigation Reviews (Arup, 2022), mitigation requirements shall be developed and secured within a CESMP and DMP As per the requirements of PR6, the CESMP shall compile all objectives and actions related to managing biodiversity risks.	Minimising potential impacts on biodiversity. Management of biodiversity risks and opportunities.	PR6, Habitats Directive, Birds Directive, Good international practice.	DCT Gdansk EPC Contractor Support to be provided by an external consultant with sufficient experience in biodiversity requirements of PR6 including mitigation for priority biodiversity features and critical habitat features (estimating 6 person days)	Prior to commencement of construction work. Allow for noise monitoring in programme – to be conducted at commencement of piling programme.	Biodiversity mitigation measures incorporated into DCT's IMS and EPC Contractor CESMP and DMP with specific attention to dredging and pilling works CEMP and DMP is approved by the Supervision Engineer and Lenders Technical and E&S Advisor CESMP is regularly reviewed and updated as required throughout implementation. Record of activities is maintained and reported in self-monitoring reports to Lenders and via Lenders Technical and E&S Advisors audits and reports.	Open

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6.2	Implement recommendations of Marine Mammals Mitigation Review (Appendix A to CHA, Arup, 2022). Dredging - dredging activities only require 'soft-start' as noise mitigation for marine mammals; as mandated by the Environmental Decision [2019]. Piling - EPC Contractors to adopt Marine Mammal Mitigation Protocol during all piling operations, including: - Noise monitoring during initial piling (2-3 installations - vibratory and percussive). - Pre-Works marine mammal search, 500m radius. - Soft-start protocols – details for breaks in piling within Appendix A, Marine Mammals Mitigation Review .	Minimising impact on Critically Endangered, Endemic, Migratory and Protected Marine Mammals [Baltic Sea Harbour Porpoise, Baltic Sea Grey Seal and Harbour Seal]. Management of biodiversity risks and opportunities.	PR6, Habitats Directive, Good international practice Environmental Decision [2019] requirements; re. soft-start. Ensures compliance with the prevention and foresight principle required by Article 6 of the Environment Protection Act 2001 (Polish Journal of Laws 2021, Item 1973 as amended).	EPC Contractor Procurement of MMO / PAM resources – resource requirement to be informed by Contractor's Method Statement and Works Programme. Resourcing to be reviewed by the Lender. Noise Monitoring data to be reviewed by Lender, and review of mitigation requirements undertaken.	As per Piling Programme and Marine Mammal Mitigation Review.	Requirements of the Marine Mammal Mitigation Review reflected in the ESMS, Construction Method Statement and CESMP. As a part of Construction and Operation Monitoring Plan implementation, Monthly Marine Mammal Monitoring Reports routinely issued to specify standards for Lender's review.	Open

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	- Recommence protocol after cessation of activities for ≥30[1] minutes – details within Appendix A. - Experienced Marine Mammal Observers (MMO) and / or Passive Acoustic Monitoring (PAM) to be used throughout. - MMO / PAM to have authority and means to stop activities as required by the Protocol. - Effective resourcing and positioning of MMO / PAM to avoid fatigue and enable effective observation of Mitigation Zone.						
6.3	As a part of CHA recommendations of Ornithology Mitigation Review (Arup, 2022), adopt Bird Mitigation Protocol, including:	Minimising impact on globally threatened and protected nesting bird species. Management of biodiversity risks and opportunities.	PR6, Habitats Directive, Birds Directive, Good international practice	EPC Contractor own resources.	Method Statement approved by the Supervising Engineer prior to commencement of construction works.	Requirements of the Ornithology Mitigation Review reflected in the Construction Method Statement, ESMS and CESMP.	Open

[1] The proposed timing deviates from the JNCC (Joint Nature Conservation Committee) protocol considered good practice for piling activities. As the JNCC protocol has been developed in the UK with specific objective of protecting species present in the North and Irish Seas and Atlantic ocean, the proposed changes will be consulted with experts of Hel Marine Station of the University of Gdansk through focused engagement during disclosure of this documentation.

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	-Avoiding specified construction works (including dredging operation) from April to August (inclusive) – as per Environmental Decision Requirement. -Mooring of vessels at breakwaters should be limited as much as possible between April and July to avoid disturbance to nesting birds. -Visual monitoring of the sediment plume. -Where / if required, new interpretation boards should be installed on the fence of the T2 compensation area and surrounding locations to highlight the importance of the site for nesting birds.				Actions – as relevant during construction.	Record of implementation.	
6.4	As a part of Construction and Operation Monitoring Plan implementation, finalise the schedule (when required), carry out and keep record of biodiversity monitoring, including monitoring of the	Minimising potential impacts on biodiversity. Management of biodiversity risks and opportunities.	PR6, Habitats Directive, Birds Directive, Good international practice	DCT Gdansk EPC Contractor Support to be provided by an experienced external consultant	During and post-construction works.	Monitoring schedule in place with responsible person reporting on a regular basis.	Open

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	compensation area to collect data on nesting bird species.			with relevant experience in marine mammals, and bird monitoring.			
6.5	Consultation with relevant authorities: Regional Director for Environmental Protection in Gdansk and the Chief Inspector of Environmental Protection, should be undertaken to inform the bird monitoring schedule and scope and allow sharing of data.	Management of biodiversity risks and opportunities	PR6, Habitats Directive, Birds Directive, Good international practice	DCT Gdansk	During and post-construction works.	Evidence of engagement and data sharing with Regional Director for Environmental Protection in Gdansk and the Chief Inspector of Environmental Protection,	
6.6	Monitoring of the compensation area should include the collection of rubbish and maintenance of the fence and signs to ensure they remain effective in reducing disturbance that may impact breeding success	Management of biodiversity risks and opportunities	PR6, Habitats Directive, Birds Directive, Good international practice	DCT Gdansk	During and post-construction works.	Evidence of the compensation area in appropriate condition when visited by Lenders Technical and E&S Advisor	
PR7	**Indigenous People**						
7.1	Not applicable						

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PR8	**Cultural Heritage**						
8.1	Implement the following measures - as required by the Environmental Decision for the Project (2019) - to ensure no marine archaeology and object with cultural heritage value are affected during construction and dredging works : - Baseline sonar investigation before starting any construction and dredging works - Continuous archaeological supervision during all works involving any intervention with seabed Please refer also to ESAP items 1.6, 1.7, 1.9	Avoiding impacts on marine archaeology	PR8	DCT Gdansk EPC Contractor	Pre-constructin and during construction works.	Results of sonar investigations. Evidence of archaeological supervision during the works (agreement in place, protocols of observations) Record of actions undertaken – if relevant.	Open
PR10	**Information Disclosure and Stakeholder Engagement**						
10.1	DCT to implement and regularly update the Project-specific Stakeholder Engagement Plan (SEP) prepared by the Consultant.	Informed consultation and participation	PR 10 Good international practice	DCT management time	Throughout the life of the investment	SEP implementation programme in place and followed Record of activities maintained	Open

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	Actions include regular engagement and consultation with stakeholders, public information and monitoring of economic impacts.					Activities reported in self-monitoring reports to Lenders	
10.2	Implement the Grievance Mechanism as set out in the Stakeholder Engagement Plan, reporting grievance status and trends to EBRD in periodic E&S self-monitoring reports.	Effective management of stakeholder grievances	PR 10 Good international practice	DCT management time	Throughout the life of investment	Up-to-date record and register of grievances maintained Grievances accurately recorded, opened and closed. Grievance status and trends analysed and reported in periodic self-monitoring reports to Lenders	Open

Operation Phase

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status

PR1	Assessment and Management of Environmental and Social Impacts and Issues						
O1.1	DCT to extend the existing operational plans to cover measures from the EIA, ESAP, national requirements, EBRD PRs and good international practice relevant for T3 Project. Once the Design for Execution becomes available, the existing relevant management plans prepared for T1 and T2 should be checked for their applicability and adequacy and revised to include the activities and standards related to the T3 Project. This process should be well documented within the management system.	Management of E&S impacts and risks as part of existing management system. Improved and continual improvement of environmental, social, health and safety performance Harmonised performance across company employees and contractors.	PR1 Good international practice	DCT management time	Prior to start of operation	Updated operational plans and management plans that form IMS are in place and are approved by the Supervising Engineer and EBRD.	Open
O.1.3	As a part of E&S Operation Monitoring Plan the DCT to continue to quantify direct emissions from the facilities owned or controlled within the physical project boundary, as well as indirect emissions associated with	GHG emission management	EBRD PR1 EBRD PR3 EU regulations	DCT internal resources/ Consultant time (estimated 10 days annually)	Annually	Results of GHG emission monitoring. If the emissions produce more than 25,000 tons of CO2-equivalent per annum, quantification of GHG emissions should be conducted annually with the results submitted to the Lenders and publicly disclosed in accordance	Open

	the off-site production of energy used by the project.					with internationally recognized methodologies and good practice, such as GHG Protocol.	
PR10	**Information Disclosure and Stakeholder Engagement**						
O10.1	Update and implement SEP for operation phase.	Informed consultation and participation	PR 10 Good international practice	DCT management time	Throughout the life of investment	SEP implementation programme in place and followed Record of activities maintained Activities reported in self-monitoring reports to Lenders	Open