

CO₂ Communication Plan

VeenIX A9 BAHO's compliance plan for the CO₂ Performance
Ladder



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1. Introduction

This document outlines the communication strategy of FCC Construcción S.A. (NL) in achieving Level 5 certification within the CO2 Performance Ladder Framework, as stipulated by SKAO in their "CO2 Performance Ladder Handbook 3.1" guidelines. By presenting this CO2 Communication Plan together with CO2 Communication Report we are committed to showcase our progress towards level 5 certification.

The communication objectives are being explained as they are different for internal and external communication efforts. **Internally**, this plan aims to secure employee engagement and understanding of our carbon reduction goals, energy policy, and individual contribution opportunities. Through this plan, our objective is to foster awareness, instigate behavioural modifications, promote collaboration, ensure transparency and consistency, and cultivate motivation and active engagement among our workforces. **Externally**, it seeks to demonstrate our commitment to sustainability. Through this plan, our aim for external communication entails fostering transparency and accountability, enhancing our positive image, fostering collaborations aimed at further reduction and innovation, and assuming a pioneering role within the market landscape.

Additionally, there is a different need for messaging per target group. For employees, informative updates will be provided on CO₂ footprint, reduction targets, energy consumption trends, and individual contribution options. Organizations that are connected to the project, are in the supply chain, the same market or the different governmental bodies will be informed on the topics of the energy policy, energy, CO₂ reduction targets, measures taken, and the trends that are noticed within the organization regarding energy usage and CO₂ reduction measures.

Moreover, these needs will be met through different communication channels and resources. Internally, several channels are used such as internal newsletters, meetings, and the Town Hall meetings. Externally, press releases, website updates, social media, sustainability reports, and participation in industry events will be leveraged.

A designated communication team will oversee the planning, implementation, and monitoring of the strategy. Specific roles and responsibilities will be assigned, and a schedule will be established for all communication activities. Moreover, where the responsibilities lie will be explained in this document.

This plan includes the 'Plan-phase' of the Deming Circle, while the Do-Check-Act phases are detailed in the prevailing Communication Report. This Communication Plan meets the criteria 2.C.2, 2.C.3, 3.C.1, 3.C.2, 4.C.1, set out in the CO2 Performance Ladder (Handbook version 3.1). The plan itself is proof that we meet requirement 3.C.2 which states that the company must have a Communication Plan that lists the documented tasks, responsibilities, and methods of communication for the organization and the projects.

Additionally, it includes detailed actions and explanations for meeting requirements 1.C.2, 2.C.1, 3.C.1, 4.C.1, and 5.C.1. The execution of requirements 1.C.1, 1.C.2, 2.C.1, 4.C.2, 5.C.1 and 5.C.2 is detailed in the prevailing Communication Report.

The communication plan has the following structure:

- ✓ Chapter 2 explains the communication objectives.
- ✓ Chapter 3 describes the plan for the coming year.

2. Our goal

Recognizing the construction sector's reliance on natural resources, FCC Construcción S.A. (NL) prioritizes sustainable construction practices and is committed to responsible resource utilization and minimizing the environmental impact throughout its operations.

To achieve environmental sustainability, FCC Construcción S.A. (NL) is actively pursuing several key initiatives, all of them as part of the objectives established in the [Sustainability Strategy of FCC Construcción](#), which establishes the company's roadmap to approach the current challenges and opportunities of the three dimensions of sustainability: Environmental, Social and Governance (ESG), as well as an additional dimension among all of them and helps to achieve the rest of the objectives. As part of the Sustainability Strategy, regarding greenhouse emissions, FCC Construcción has a [Climate Change Strategy](#), as part of the Environmental Dimension of the 2050 Sustainability Strategy, to deal with the strategic line of **Climate Action**.

FCC Construcción S.A. (NL) achieves environmental sustainability and helps the company to achieve its goals by implementing and complying with the CO2 Performance Ladder certification requirements at level 5 in its project A9 Badhoevedorp - Holendrecht.

This Communication Plan outlines the development and execution of a series of targeted communications aimed at informing, engaging, and motivating stakeholders regarding our CO2 Performance Ladder certification journey. Additionally, these communications serve to strengthen relationships with our client Rijkswaterstaat and employees, fostering a shared commitment to environmental responsibility.

2.1 Internal communication goals

By executing this plan, the internal target group at FCC Construcción S.A. (NL) will become aware of the CO₂ and energy reduction goals, as well as the steps needed to achieve that reduction. Communicating these goals will instigate behavioural modifications. Additionally, the plan aims to promote collaboration, motivate, and activate the workforce. A clear communication plan also ensures transparency and consistency.

2.2 External communication goals

The goal of external communication is primarily to foster transparency and accountability with our clients, subcontractors, chain partners, government agencies, and other relevant external partners. By providing transparency on the CO₂ and energy reduction goals, along with the progress made towards them, our positive image will be enhanced. Like the internal communication, the external goal aims to foster collaboration to ensure further reduction and innovation during this project. Additionally, clear, and concise communication will help establish FCC Construcción S.A. (NL) as a pioneer within the market landscape.

3. Plan

The first step towards effective communication is the Plan-phase. In this phase, the target audience is analysed. After that, the target groups that are established can be classified according to the internal organization and external organization.

This section outlines several requisites and clarifies our strategies for fulfilling them. Initially, we elaborate on the stakeholder analysis conducted to address requirements 2.C.3, 4.C.1 and 4.C.2. Subsequently, we explain the internal and external communication strategies developed to satisfy requirements 1.C.1, 1.C.2, 2.C.1, 3.C.1, 3.C.2 and 5.C.3.

3.1 Stakeholder analysis – Internal target audiences

The internal target group of FCC Construcción S.A. (NL) can be segmented into three distinct groups: the executive board, the management team, and the general staff. The general staff can be further categorized based on their work location: Those situated in office environments, those situated at construction sites, and those engaged in travelling service and maintenance roles.

The effectiveness of communication strategies hinges on several factors, including the intended function (language, culture, and content), and the accessibility of the target audience within the context of their physical location. For instance, staff working at construction sites may have limited access to digital communication tools and are likely to have a lower propensity to engage with reports on CO₂ management. Therefore, a comprehensive analysis of all aspects is essential to determine the most appropriate resources and media for deployment.

3.2 Stakeholder analysis – External target audiences

Furthermore, it is essential to ensure that external stakeholders are aware of the energy and CO₂ reduction targets established by FCC Construcción S.A. (NL). According to the requirement 2.C.3 the external stakeholders need to be identified. In this sub-chapter a stakeholder analysis will be conducted to identify all potential stakeholders. There is no prioritization of these stakeholders in order of importance. Additionally, the existing CO₂ Management Report has been leveraged to develop a list of A-Suppliers relevant to this project phase.

Government agencies

Local, regional, and national governments all have a significant interest in CO₂ reduction. This focus is driven by both climate change objectives and regulatory frameworks established to promote environmental sustainability. Government agencies relevant to the project can be found in the list below:

- Rijkswaterstaat (client)
- Ministry of Infrastructure and Water Management (policymaker)
- Ministry of Economic Affairs
- ProRail
- Regional water authorities (Amstel, Gooi en Vecht)
- VROM
- Province of Noord-Holland
- Municipalities Amsterdam, Diemen, Ouder-Amstel, Amstelveen
- Law enforcement
- Fire brigade

Community

Residents living near the construction project have an interest in CO₂ reduction due to potential impacts on air quality, health, and the overall liveability of the area. These residents can be united by forming local interest groups.

Construction companies and contractors

The implementation of sustainable construction methods, materials, and technologies by construction companies and contractors can yield significant benefits, including CO₂ reduction, long-term cost savings, and compliance with green certifications. Furthermore, the potential exists for the reuse of surplus materials from a project like the A9 by other organizations. Entities such as Heijmans, BAM Infra, and Ballast Nedam could potentially incorporate these materials into their own projects, fostering a more circular economy within the construction industry. Notably, Dura Vermeer has already demonstrated this approach by planning to utilize recovered concrete beams from the A9 project in a nearby development.

Suppliers of construction materials

Companies supplying construction materials have an interest in CO₂ reduction publications due to the growing demand for sustainable materials and products with a lower environmental impact. They can also benefit from publications leading to potential collaborations and innovation in developing even more sustainable construction materials.

Investment firms and financial institutions

Amidst rising pressure to reduce CO₂ emissions, publications detailing CO₂ reduction efforts by other companies serve as a valuable resource for investment firms and financial institutions. These publications provide a wealth of information that empowers these entities to make more informed decisions about where to allocate their capital.

CO₂ reduction publications also play a significant role in client relationships. A growing number of individuals are interested in investing their money in companies committed to a better world. By demonstrating a commitment to CO₂ reduction, financial institutions can attract and retain these clients.

These CO₂ reduction publications offer valuable insights for investment firms and financial institutions in managing risk, identifying sustainable investment opportunities, and enhancing client relationships.

A-Suppliers

Suppliers and subcontractors contribute to the reduction policy that FCC Construcción S.A. (NL) has implemented regarding its CO₂ emissions. To involve the suppliers, inform them, and indicate how they can and need to participate, it is very important to have and maintain a good relationship with the suppliers. Suppliers must adhere to the objectives that FCC Construcción S.A. (NL) has set for the reduction targets for CO₂ emissions.

A-suppliers have been analysed (see the prevailing CO₂ Management Report for a complete overview of the suppliers and the analysis) for FCC Construcción S.A. (NL). The A-suppliers list will change as the phase of the project changes. These changes will be recorded when these happen in the CO₂ Communication Report.

Specific – NGO

NGOs are organizations with a social character that use their influence to change the policies of governments and businesses. Many NGOs are active in the field of Corporate Social Responsibility. These NGOs are interested in FCC Construcción S.A. (NL) 's activities to reduce CO₂ emissions. They are also prepared to contribute while producing plans to achieve corporate social responsibility and sustainable entrepreneurship. They are a sounding board for FCC Construcción S.A. (NL) and our energy policy. Talking to and informing about this happens individually and through the trade association. An important other NGO or related organization is SKAO.

Specific – GO

Governments and government institutions also belong to the target group of FCC Construcción S.A.

(NL), consisting of:

- Rijkswaterstaat
- Ministry of Infrastructure and the Environment
- Ministry of Economic Affairs
- ProRail
- Regional water authorities
- VROM
- Province of Noord-Holland
- Municipalities
- Law enforcement
- Fire brigade

Additionally, actual, and potential collaboration partners for CO₂ reduction are important for external communication, according to requirement 2.C.3. Current collaboration partners and potential future partners can be found in the in the prevailing CO₂ Chain Initiatives Plan. It is of importance that when there is a collaboration with these initiatives that external communication is meeting their needs.

By conducting stakeholder mapping, we initiate the initial phase of establishing communication with them. Furthermore, this action fulfils requirement 2.C.3, stipulating the identification of external stakeholders pertinent to the organization and its projects. This process facilitates the creation of an inventory, delineating the relevance of each stakeholder to specific topics. Subsequently, we can commence dialogues with the stakeholders accordingly. By conducting a dialogue with stakeholders, we comply with requirement 4.C.1, which states that we must conduct a dialogue twice a year. The dialogue will ensure that we can identify what the areas of concern of the project are for our stakeholders to comply with requirement 4.C.2.

3.3 Internal communication

Depending on the target group, different resources and media are used. For internal communication on the subjects of:

- Energy and CO₂ policy;
- Energy reduction targets;
- CO₂ reduction targets;
- The reduction measures and progress of those measures;
- Possibilities for individual contributions and the feedback on that (for scope 1 & 2);
- Trends on energy usage within the company.

To reach this level of internal communication we propose the following means and media in the table below. Throughout these means and media all topics as mentioned above will be discussed.

	Means and Media	Frequency	Target group
1	Project ESG Team Work Meeting	Weekly	Project team
2	Project Management Team Meeting	Twice per year	Management team
3	Town Hall meetings	3 times / year	All
4	FCC Construcción S.A. (NL) website	Twice a year	Staff (office, construction sites & traveling service and maintenance roles)
5	CO ₂ Board meeting	9 times / year	Executives
6	Energy and CO ₂ Reporting	Half year/ year	All

7	CO2-Posters/ Factsheets / CO2-Competition	Twice per year	All
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As can be seen in the table, we plan to communicate internally on a structural basis about the needed subjects, additionally leaving room for ad-hoc communication efforts when they might arise. By leaving both in this plan meets the following requirements 1.C.1, 2.C.1, 3.C.1 and 5.C.3. We consider the communication deadlines as project requirements. Therefore, upon certification, the deadlines are incorporated into the Sustainability Management Plan. The required meetings are communicated a minimum of three months in advance. This is monitored by the CO2 Management Board.

3.3.1 Project ESG Team Work Meeting

The work meetings with the Project Team are meant to discuss the weekly actions to be taken to achieve and maintain the CO2 Performance Ladder (CO2PL) certification. On average the meetings are held on a weekly basis (approximately 40w in total per year). Depending on the type of requirements the targets, achievements and upcoming events are addressed. Actions are recorded in minutes and stored on our SharePoint environment. Mainly the Project Team uses these recorded minutes.

3.3.2 Project Management Team Meeting

The PMT work meetings are about the status of our certification, our objectives, results achieved, ideas received and the progress of our sector/chain and project initiatives. A factsheet will be updated before every PMT meeting with focus points regarding the CO2PL perspectives:

A: Insight, B: Reduction, C: Transparency and D: Participation.

The meetings have a formal nature and are meant for decision making on management level. The FCC Construcción S.A. (NL) work meeting takes place at least once every six months. Actions are recorded in minutes and stored on our SharePoint environment. Mainly the Project Management Team uses these recorded minutes. The project team can also access these minutes so actions can be taken.

3.3.3 Town Hall Meeting / Every 4 months meeting

FCC Construcción S.A. (NL) provides the opportunity for all staff to take the stage and share the progress about their work. These lunch meetings are called 'Town Hall Meeting'. Three times a year FCC Construcción S.A. (NL) will take this opportunity to involve and inform the staff from FCC Construcción S.A. (NL) to know the latest news about projects, results and main goals of the company. Regarding GHG emissions and the CO2 PL certification, the company will share information about:

- 1) critical feedback on the reduction targets,
- 2) the progress on achieving these targets and
- 3) provide ideas that contribute the achieving our targets.

3.3.4 FCC Construcción "Boletín mensual"

Twice a year FCC Construcción shares an internal update of the status of its projects in terms of sustainability and greenhouse gases emissions and the progress on the reduction goals. FCC Construcción uses this internal channel to communicate its staff of all major milestones.

3.3.5 Sustainability Board meeting

During the CO2 Board Meeting the project management meets with the project director to discuss the progress of reducing the CO₂ and energy usage and the status of the required documents needed

to achieve the level 5 requirements of the CO2 Prestation Ladder.

3.3.6 Reporting results of each project

Factsheets of each project are published to inform the progress of the sustainability measures carried out in each project regarding CO₂ PL results. These factsheets are also used as reporting progress regarding the CO₂ and energy reduction goals.

3.3.7 CO₂-posters/CO₂ competition/FACTSHEETS – ESG – CO₂

Not only in the start of the project but also during, employees have great ideas on how to reduce CO₂. Employees of FCC Construcción will be encouraged to explore ideas for reducing CO₂ emissions within the company. This competition is beneficial for creating awareness among the employees, but also for retrieving potential reduction strategies out of insights from within the company's environment. Additionally, factsheets regarding ESG, and the CO₂ goals will be presented to the employees of FCC Construcción through VEENIX Total.

3.3.8 Other

By presenting quarterly updated reports, plans, and in-depth technical information about the various CO₂ PL aspects: A. Insight, B. Reduction, C. Transparency, D. Participation on SharePoint employees of FCC Construcción are able to learn more about the CO₂ and energy reduction goals, and the actions that have been taken and future actions.

By doing all these actions regarding internal communication we are meeting the requirements of 1.C.1, 2.C.1, 3.C.1 and 5.C.3.

3.4 External communication

Depending on the target group, different resources and media are used. For external communication on the following subjects:

- Energy policy;
- Energy reduction targets;
- CO₂ reduction targets;
- Reduction measures and progress;
- Trends within company.

To reach this level of external communication we propose the following means and media in the table below. Throughout these means and media all topics as mentioned above will be discussed.

	Means and Media	Frequency
1	FCC Construcción & SKAO website	Twice per year
2	Public news, press & journal releases	Ad hoc
3	Corporate sustainability report FCC Construcción S.A.	Annually
4	Communication with workgroup	Ad hoc
5	Active participation in and initiation of working group	See Chain Initiatives

As can be seen in the table, we plan to communicate externally on an ad hoc basis and on a structural basis, which will fulfil requirements 1.C.2, 3.C.1 and 5.C.3. We consider the communication deadlines as project requirements. Therefore, upon certification, the deadlines are incorporated into the company's Relatics. The required meetings are communicated a minimum of three months in advance. This is monitored by the CO₂ Management Board.

3.4.1 FCC Construcción S.A. (NL) & SKAO website

An internet publication is required for the CO2 Performance Ladder. In this publication of at least one page the following requirements need to be included: 3.B.1, 4.B.2, 5.B.2, 3.C.1, 5.C.1, 3.D.1, 4.D.1, 5.D.1 in §6.2 of CO2 Performance Ladder Handbook 3.1. Additionally, a link needs to be included that leads to the SKAO-website on which the documents concerning requirements 4.A.1, 3.D.1, 4.D.1, and 5.D.1 can be found. By publishing this information, we are meeting the requirement of 6.1.3.

Twice a year there will be a publication on the website of FCC Construcción S.A. (NL) <https://www.fccco.com/web/paises-bajos> and FCC Construcción (NL) Performance Ladder de CO2 nivel 5 - FCC and in the SKAO-website. By placing one publication on the organisational website the requirement of 3.C.1 is met.

3.4.2 Public news, press & journal releases

FCC Construcción S.A. (NL) will communicate externally by means of news, press or journal releases and publications will be published on the website of FCC Construcción S.A. (NL) <https://www.fccco.com/web/paises-bajos> and FCC Construcción (NL) Performance Ladder de CO2 nivel 5 – FCC. These publications will be done ad-hoc depending on the projects and timing.

3.4.3 Corporate sustainability report FCC Construcción

FCC Construcción publishes annually several sustainability reports;

- GHG Emissions Report
- Sustainability Report
- Environmental Report

Regarding the GHG Emissions Report, the CO₂ emissions allocated per country are analysed and communicated, including the declaration of the external verification done by AENOR.

The emissions of The Netherlands are directly linked to the activities of FCC Construcción S.A. (NL).

On the Sustainability and Environmental Reports, chapters of GHG Emissions and Climate Change are always present to communicate the main results and performance of the company towards its Climate Change Strategy.

3.4.4 Communication with Initiative Workgroup

If FCC Construcción S.A. (NL) is certified as large company, there will be requirements that will need to be met regarding chain initiatives. During the collaboration with the different initiatives' organisations, communication will be ad hoc to match the current needs of the project.

3.4.5 Active Participation in and Initiation of Working Groups

Within the social environment in which FCC Construcción S.A. (NL) operates, there are various initiatives that aim to improve the quality of life in the area. FCC Construcción S.A. (NL) will participate in at least one of these initiatives and, by deploying its knowledge in the field of climate technology, will make an active contribution to the CO₂ emission reduction working groups in the context of processes in the industry (requirement 3.D.2). It also communicates its own results in these working groups and indicates how it intends to achieve the set objectives. See the prevailing Chain Initiatives report for the execution.

3.4.6 Conversations with NGOs and GOs

If FCC Construcción S.A. (NL) meets the medium or large requirements, a plan will be developed to comply to the requirements (4.C.1, 4.C.2, 5.C.1 & 5.C.2). FCC Construcción S.A. (NL) will meet up with Rijkswaterstaat twice a year to initiate a dialogue concerning their reduction targets and strategy. These dialogues will be noted, and feedback will be reported and processed (requirement 4.C.1 & 4.C.2). Additionally, FCC Construcción S.A. (NL) will commit to more than 1 governmental CO₂ reduction program (requirements 5.C.1 & 5.C.2).

3.5 Planning

	Means and media	Internal or External	Frequency	Monitoring
1	Project ESG Team Work Meeting	Internal	Weekly	Quarterly check for completeness
2	Project Management Team Meeting	Internal	Twice per year	Yearly
3	TOWNHALL meetings	Internal	3 times per year	Yearly
4	FCC Construcción S.A. (NL) "Boletín mensual"	Internal	Twice per year	Yearly
5	CO2 Board meeting	Internal	9 times / year	Quarterly check for completeness
6	Energy and CO2 Reporting	Internal	Half year/ year	Yearly
7	CO2-Posters/ Factsheets / CO2-Competition	Internal	Twice per year	Yearly
8	FCC Construcción S.A. (NL) & SKAO website	External	Twice per year	Yearly
9	Public news, press & journal releases	External	Ad hoc	Yearly
10	Corporate sustainability report FCC Construcción S.A.	External	Annually	Yearly
11	Communication with workgroup	External	Ad hoc	Yearly
12	Active participation in and initiation of working group	External	See Chain Initiatives	Quarterly check for completeness

3.6 Monitoring and evaluation

Progress is periodically monitored in the planning based on measuring points and adjusted if necessary. The deployment of resources is evaluated annually or quarterly depending on the subject, an overview can be found in 3.5 Planning. The Communication Plan for the following year is made based on this evaluation.

3.7 Deviations

From the annual meeting, where the communication progress and status are discussed, an "annual review" document is drawn up with the information discussed.

Deviations from the planning are communicated and evaluated with the persons concerned.

3.8 Realisation phase

ESG or Sustainability Manager is responsible for all external and internal communications regarding planning (in consultation with FCC's Quality and Environmental Department and Corporate Communication Department and progress. This is done in consultation with the CO2 Management Board, at FCC Construcción S.A. (NL).

Responsible people:

- CO2 Management Board
- Project Director
- Project Execution manager
- Project Control manager
- Strategic Consultant ESG
- Sustainability Manager

ESG Team:

- Project Control Manager
- Sustainability Manager
- ESG Coordinator
- ESG Controller