

Taweelah 200 MIGD IWP Seawater  
Reverse Osmosis Plant  
Abu Dhabi, UAE



Stakeholder Engagement  
Plan



Prepared for:



August 2019

## DOCUMENT INFORMATION

<b>PROJECT NAME</b>	Taweelah 200 MIGD IWP Seawater Reverse Osmosis Plant, Abu Dhabi, UAE
<b>5Cs PROJECT NUMBER</b>	1305/001/071
<b>DOCUMENT TITLE</b>	Stakeholder Engagement Plan
<b>CLIENT</b>	ACWA Power
<b>5Cs PROJECT MANAGER</b>	Eva Muthoni Kimonye
<b>5Cs PROJECT DIRECTOR</b>	Ken Wade

## DOCUMENT CONTROL

VERSION	VERSION DATE	DESCRIPTION	AUTHOR	REVIEWER	APPROVER
-	09/06/2019	SEP - Draft	EMK	KRW	-
1.1	15/08/2019	SEP – v1.1	EMK	MKB	KRW



1	Financial Capital	Regardless of location, mode of delivery or function, all organisations are dependent on
2	Social Capital	<i>The 5 Capitals of Sustainable Development</i> to enable long term delivery of its products or services.
3	Natural Capital	
4	Manufactured Capital	Sustainability is at the heart of everything that 5 Capitals achieves. Wherever we work, we strive to provide our clients with the means to maintain and enhance these stocks of capital assets.
5	Human Capital	

## DISCLAIMER

5 Capitals cannot accept responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from the party which commissioned it.

This document is issued for the party which commissioned it and for specific purposes connected with the above-identified project only. It should not be relied upon by any other party or used for any other purpose

# CONTENTS

1	INTRODUCTION	1
1.1	Location of the Project Site	1
1.2	Local Receptors and Sensitivities	2
1.3	Project Overview	5
1.3.1	Project Development Rationale	5
1.3.2	Project Background and Context	6
1.3.3	Project Description	6
1.4	Scope of the SEP	7
1.5	Objectives of the SEP	8
2	REGULATIONS AND REQUIREMENTS	9
2.1	National Requirements	9
2.2	Lender Requirements	9
2.2.1	The Equator Principles	9
2.2.2	IFC Performance Standards	10
3	STAKEHOLDER ENGAGEMENT FOR THE PROJECT	14
4	STAKEHOLDER IDENTIFICATION AND ANALYSIS	15
4.1	Approach to Stakeholder Identification	15
4.1.1	Impacted Stakeholders	15
4.1.2	Interest Based Stakeholders	17
5	STAKEHOLDER ENGAGEMENT PROGRAMME	19
5.1	Engagement Methods	19
5.2	Public Disclosure of ESIA	19
5.3	ESIA Consultations and Stakeholder Engagement	20
5.4	Stakeholder Engagement During Construction	23
5.5	Stakeholder Engagement During Operation	24
5.6	On-going Disclosure of Environmental and Social Information	26
5.6.1	Periodic Independent Monitoring and Reporting	26
6	GRIEVANCE MECHANISM	28
6.1	Key Principles of Grievance Mechanism	28

6.2	Scope of Grievance Mechanism	29
6.3	Steps in Managing Grievance Mechanism	29
6.3.1	Publicising Grievance Management Procedures.	29
6.3.2	Submitting a Grievance	29
6.3.3	Keeping Track of Grievance	30
6.3.4	Reviewing and Investigating Grievances	31
6.3.5	Grievance Resolution Options and Response	31
6.4	Grievance Mechanism in Construction Phase	32
6.4.1	Internal Parties Grievance Mechanism	32
6.4.2	External Parties Grievance Mechanism	33
6.5	Grievance Mechanism in Operational Phase	34
<b>7</b>	<b>MONITORING AND REPORTING</b>	<b>35</b>
7.1	Independent Periodic Monitoring	35
7.2	Reporting	35
<b>8</b>	<b>IMPLEMENTATION PLAN</b>	<b>36</b>
8.1	Roles and Responsibilities	36
8.1.1	HSE Manager	36
8.1.2	Environmental and Social Manager	36
8.1.3	Community Liaison Officer	37
8.2	Timeline	38
<b>9</b>	<b>REVIEW</b>	<b>39</b>

## APPENDIX A – EXAMPLE OF GRIEVANCE FORM

## LIST OF ABBREVIATIONS

Abbreviation	Meaning
CICPA	Critical Infrastructure and Coastal Protection Authority
EAD	Environment Agency Abu Dhabi
EPC	Engineering, Procurement and Construction
EPFIs	The Equator Principle Financial Institutions
EPs	Equator Principles
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
EWEC	Emirates Water and Electricity Company
IFC	International Finance Corporation
IFIs	International Financial Institutions
IWP	Independent Water Project
KIZAD	Khalifa Industrial Zone Area
O&M	Operation and Maintenance
SEP	Stakeholder Engagement Plan
SWRO	Sea Water Reverse Osmosis
5 Capitals	5 Capitals Environmental and Management Consulting

# 1 INTRODUCTION

The Abu Dhabi Department of Energy (EWEK), formally Abu Dhabi Water and Electricity Authority (ADWEA), has authorised the development of a new Seawater Reverse Osmosis (SWRO) Plant within the Taweelah Power and Water Complex. The proposed development will have a production capacity of 200 million imperial gallons per day (MIGD), equivalent to 909,216 m<sup>3</sup>/day.

The project sponsors are seeking project finance from International Financial Institutions (IFIs) who are likely to be signatories of the Equator Principles (EP), a voluntary set of principles established to manage environmental and social investment risks. As such, the required project stakeholder's consultation process will need to be of a standard that can demonstrate alignment with both the UAE regulations and the requirements of the IFI's; expected to align with the EP's, IFC Performance Standards and IFC EHS Guidelines. This will ensure that the stakeholder engagement is a parallel track process of the project.

5 Capitals Environmental and Management Consulting (5 Capitals) has been commissioned by ACWA Power, to prepare this Stakeholder Engagement Plan (SEP).

This SEP outlines the proposed methodology for stakeholder engagement throughout the lifecycle of the project, with a specific emphasis regarding the guidelines of the International Lenders and any applicable UAE regulations. As the SEP will remain relevant throughout the lifetime of the project as a 'live document', it will act as a plan within the project's construction and operational phase ESMS that will require updating as project circumstances or stakeholder dynamics evolve; and to ensure continual improvement of the ESMS.

## 1.1 Location of the Project Site

The proposed development site is situated within the southern portion of the Taweelah Power and Water Complex with a footprint area of approximately 379,000 m<sup>2</sup>. The site surface soil profile, floral community and elevation of the site has been altered during site clearance and placement of excavated marine material excavated from the current Taweelah Complex outfall channel. All sites within the Complex are of similar make-up.

Figure 1-1 Project Location in relation to Taweelah Complex



## 1.2 Local Receptors and Sensitivities

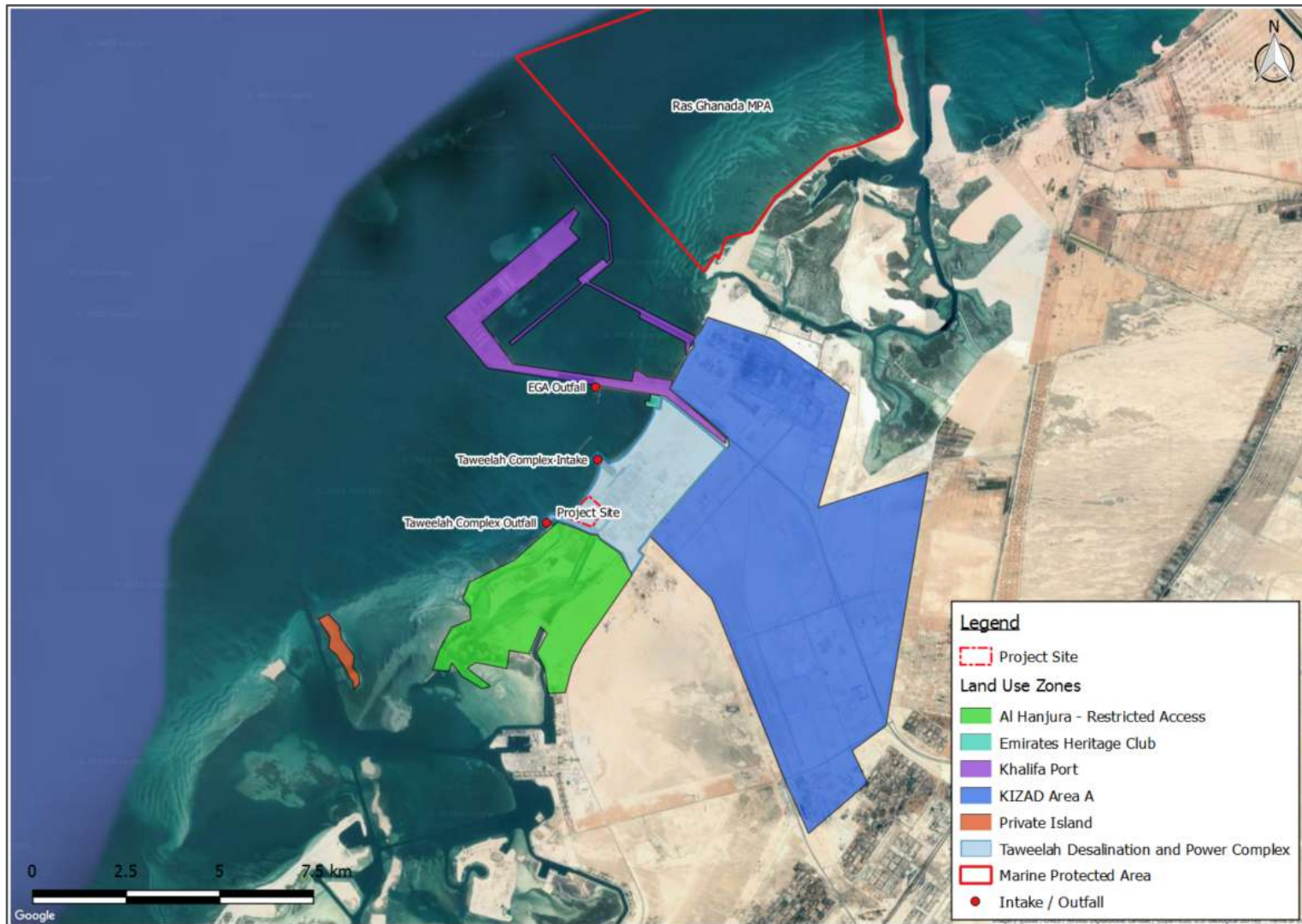
Satellite imagery and site visits undertaken at the project site identified commercial, residential and industrial receptors external to the SWRO project as shown in the table and figure below.

Table 1-1 Potential Local Receptors

RECEPTOR	RECEPTOR TYPE	DISTANCE FROM THE PROJECT SITE
Taweelah Complex	Industrial	Borders the project site to the north.
Khalifa Port	Commercial	Approximately 2km north of the project site.
Emirates Global Aluminium (EGA) alumina refinery	Industrial	Approximately 4km northeast of the project site.
KIZAD Area A	Commercial	Approximately 2.5 km northeast of the project site
CICPA/Etisalal submarine	Commercial	Approximately 45 m northwest of the project site
Dolphin Gas Pipeline	Industrial	Cuts across the extreme south of the project site

Emirates Heritage Club marina	Commercial	Approximately 3km north of the project site
Al Hanjurah	Residential	Buildings within Hunjura are located approximately 400-500 m south of the project site.
Marine Protected Area	Ecological	Approximately 7 km north east of the project site

Figure 1-2 Sensitive Receptors near the project site



## 1.3 Project Overview

### 1.3.1 Project Development Rationale

Abu Dhabi Water and Electricity Company (ADWEC) has identified the need for additional Reverse Osmosis (RO) production capacity in the Emirate of Abu Dhabi. The Statement of Future Capacity Requirements 2008 – 2030 Report (ADWEC, 2008) sets out the anticipated growth in water demand in the Emirate. The analysis was based on a review of historical demand profiles and an assessment of the capabilities of existing cogeneration plants to produce high water outputs at low power outputs. On the basis of the analysis, ADWEA identified the requirement for 251 MIGD of additional RO capacity to be made available by 2022.

The introduction of nuclear units in the electricity mix will impose constraints on water production during the winter period (ADWEC, 2008). When all four (4) nuclear reactors of the Barakah Nuclear Energy Plant are fully commissioned, they will provide almost all of Abu Dhabi's power demand during the winter period. Conventional gas combustion cogeneration units currently make up the majority of installed power and potable water generation capacity in the Emirate.

The contribution of the existing co-generation thermal desalination units will subsequently be markedly reduced during the winter period. A minimum amount of power production is required for these conventional plants to produce their maximum water output. As the cogeneration plants scale back power production, the effective water production capability of the thermal desalination plants will suffer as a result. This will create a need for additional stand-alone desalination capacities that are not constrained by the need for any associated power production. Although standalone water production is theoretically achievable with Multi Stage Flash (MSF) and Multi-effect Distillation (MED) technologies coupled to dedicated boilers, the most economical solution to achieve this is to use RO technology.

Additional RO desalination capacity is required in 2020/21 to ensure security of supply to the Emirate. On a systemic basis, RO is now significantly more efficient than thermal desalination technologies (ADWEC, 2008). Investment in new RO capacity will also enhance operational flexibility, enabling Abu Dhabi's current gas-fired IWPP fleet to be operated more efficiently, allowing a reduction in reliance on gas as a fuel source. The adoption of RO also delivers significant benefits in improved dispatch flexibility, which will be essential as inflexible nuclear power and renewable energy form a larger portion of Abu Dhabi's installed generation capacity. The development of the proposed SWRO plant at Taweelah, with an operational potable water generation of 200 MIGD, is one of the primary components of the EWEC's strategy to diversify the water generation sector and meet the anticipated growth in potable water demand.

### 1.3.2 Project Background and Context

In September 2017, EWEC submitted a proposal to the Executive Council for approval in principle to commence feasibility studies for 2 x 100 MIGD RO plants at Taweelah. EWEC then approached EAD regarding the proposed location and the potential environment impacts. EAD advised that they had no objection to the commencement of the project as long as an EIA was carried out to assess the cumulative impacts of existing projects in the area (Ref: letter ref: OUT-L/2017/EQS/0227).

In March 2018 EWEC appointed ILF as Technical Consultant for the Project and HDR was appointed as the Environmental Consultant. A draft EIA was prepared and submitted to EAD for comments which were addressed and subsequently a Conditional Approval was issued on 10<sup>th</sup> October 2018 (Ref: EMS/18/ESRF/10016).

ACWA Power appointed 5 Capitals Environmental & Management Consulting ("5 Capitals") to work with modellers HR Wallingford to assess a new optimal intake/outfall design for the ACWA Power Bid and subsequently to prepare the ESIA for submission to the Lenders. 5 Capitals has in turn appointed HDR in February 2019 to undertake the additional surveys requested by EAD and to submit an updated EIA with ACWA Power specific project design to the Abu Dhabi Environmental Regulator.

### 1.3.3 Project Description

The proposed Project will utilise Seawater Reverse Osmosis (SWRO) technology to produce up to 200 MIGD potable water, equivalent to 909,216 m<sup>3</sup>/day with production capacity of 37,884 m<sup>3</sup>/hr. The principal project components include a seawater open channel intake, a 3km piped outfall, RO plant, potable water storage tanks and solar PV panels.

The facility will have a seawater intake and pumping system which will include breakwater facilities, screening including a filtration system. In order to ensure the seawater is of suitably high quality for use in the RO Plant, the pre-treatment will be composed of at least coagulation, dosing and mixing, flocculation, high rate Dissolved Air Flotation (DAF) and Dual Media Filters (DMF).

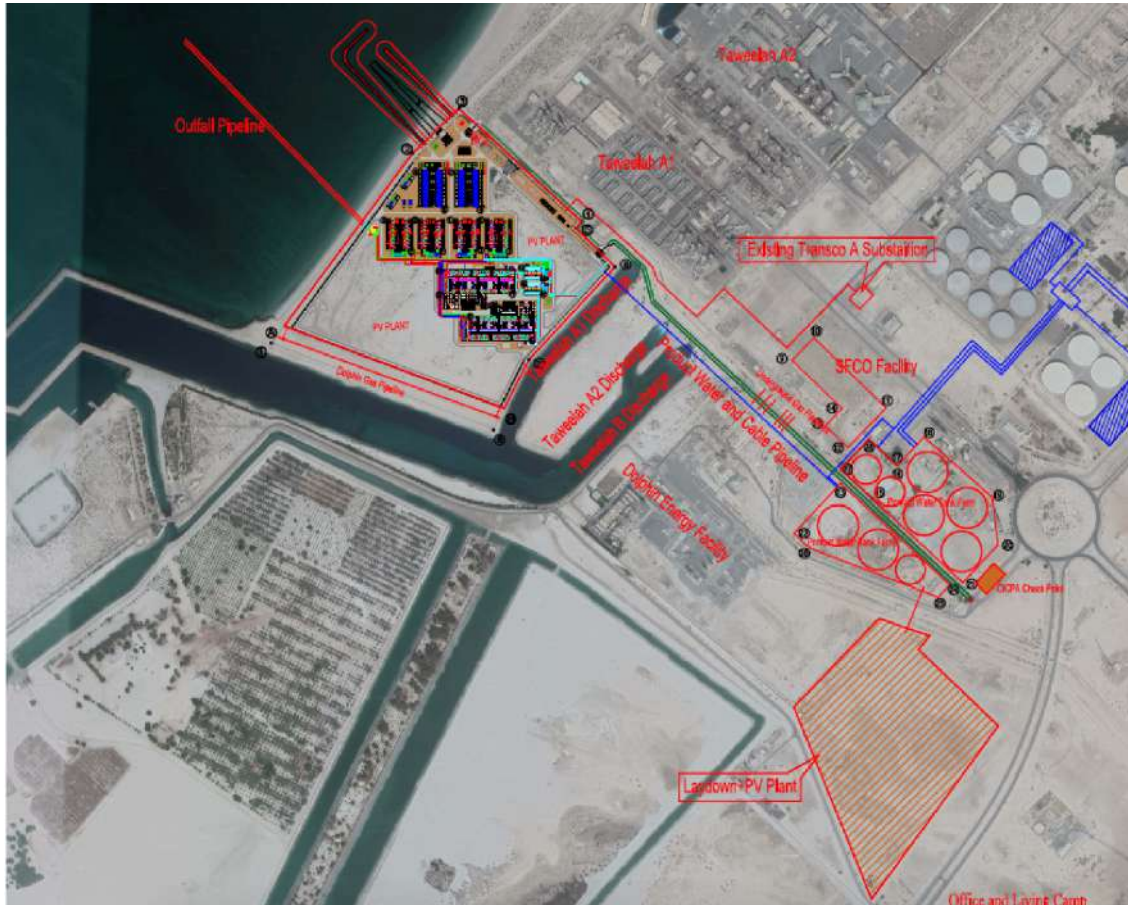
The Reverse Osmosis (RO) plant will perform the main function of separating the seawater into two streams by removing the salt from the seawater. The separation is achieved by pushing the water through membranes, with high pressure being used in the process. The two streams include;

- The permeate- which has passed through the membrane and has had most of the dissolved constituents removed and;
- The remaining brine-which contains dissolved solids.

The seawater concentrate/brine is returned to the sea to meet UAE Federal and Lenders requirements, while the permeate will be treated in a second pass. The wastewater streams will be treated on site and no sludge will be disposed to the sea.

The figure below shows the Taweelah IWP site layout and interface with Taweelah Complex.

**Figure 1-3 Taweelah IWP Layout and Associated Facilities**



## 1.4 Scope of the SEP

This document is the Stakeholder Engagement Plan Report (SEP) prepared for the Taweelah IWP in Abu Dhabi, UAE. It describes the proposed engagement processes to be undertaken during the construction and operational phases of the project.

The scope of the SEP is to provide the project with methods of efficiently managing and facilitating future engagements with stakeholders through various stages of the project lifecycle.

This SEP has been prepared to align with requirements of Equator Principle 5 and Equator Principle 6 that describes Stakeholders Engagement and Grievance Mechanism respectively, and the IFC Performance Standards, with particular relevance to IFC Performance Standard 1

on “Assessment and Management of Environmental and Social Risks and Impacts” which describes the stakeholder’s engagement requirements in more depth. However, it is recognised that elements of stakeholder engagement are included in all IFC Performance Standards

## 1.5 Objectives of the SEP

The objectives of the SEP include:

- To identify the key stakeholders that may be affected by the project or may influence the outcome of the project.
- To inform the identified stakeholders about the project and to manage stakeholder expectations;
- To understand current and potential emerging issues and to capture views and concerns of the relevant stakeholders with regard to the project;
- To provide a basis for stakeholder participation in environmental and social impact identification, prevention and mitigation.
- To propose a platform for reporting back on mechanisms to address these impacts.

## 2 REGULATIONS AND REQUIREMENTS

### 2.1 National Requirements

Abu Dhabi has tasked the role of ensuring Environmental regulatory compliance to the Environment Agency-Abu Dhabi (EAD). Statutory requirements for stakeholder engagement or project public consultation or disclosure have not been established in the UAE.

### 2.2 Lender Requirements

It is understood that the Project Sponsors will seek project finance from International Lenders who are likely to be signatories of the Equator Principles. As such there are a number of separate requirements for stakeholders' engagement in projects as set out below by the Equator Principles and International Finance Corporation (IFC); the required standards stipulated by the Equator Principles.

#### 2.2.1 The Equator Principles

The Equator Principles (EP) are a risk assessment framework used by financial institutions to determine, assess and manage the environmental and social risk in projects financing. The Equator Principles were updated in 2006 (EP II) to include projects with a capital cost of US\$10 million or more across all industry sectors and these are the prevailing applicable conditions for this project. The Equator Principles Financial Institutions (EPFIs) reviewed the Equator Principles in 2011 and approved the latest version, EP III on April 26th 2013. These became effective from June 2013. It is possible that an Equator Principles Financial Institution (EPFI) will take part in the financing of some of the activities of the project. As such the following EPs, particularly Equator Principle 5: Stakeholder Engagement and Equator Principle 6: Grievance Mechanism will be applicable.

#### **Equator Principle 5: Stakeholder Engagement**

For all Category A and Category B projects, the Equator Principles Financial Institutions (EPFI) will require the client to demonstrate effective Stakeholder Engagement as an on-going process in a structured and culturally appropriate manner with affected communities and, where relevant, other Stakeholders. For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an informed consultation and participation process. The client will tailor the stakeholders' engagement consultation process to:

- The risk and impacts of the projects,
- The projects phase of development,
- The language preferences of the Affected Communities;

- Their decision-making processes; and
- The needs of disadvantaged and vulnerable groups.

This process should be free from external manipulation, interference, coercion and intimidation.

To facilitate Stakeholder Engagement, the client will, commensurate to the project's risks and impacts, make the appropriate assessment documentation readily available to the Affected Communities, and where relevant other Stakeholders, in the local language and in a culturally appropriate manner.

The client will take account of, and document, the results of the Stakeholder Engagement process, including any actions agreed resulting from such process. For Projects with environmental or social risks and adverse impacts, disclosure should occur early in the Assessment process, in any event before the Project construction commences, and on an ongoing basis.

#### **Equator Principle 6: Grievance Mechanism**

For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the ESMS, to establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance.

The grievance mechanism is required to be scaled to the risks and impacts of the Project and have Affected Communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism in the course of the Stakeholder Engagement process.

### **2.2.2 IFC Performance Standards**

The IFC Performance Standards are designed to help identify, avoid, mitigate, and manage risks and impacts throughout the life of a project. These standards provide a way of doing business in a sustainable way by including stakeholder engagement and disclosure obligations of the client in relation to project-level activities.

All of the IFC Performance Standards include requirements for an amount of stakeholder engagement and therefore the project will require a level of engagement when each standard is triggered by a project. In particular, IFC Performance Standard 1 on "Assessment and Management of Environmental and Social Risks and Impacts" describes the stakeholder engagement requirements in more depth. It states the following:

“Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project’s environmental and social impacts. Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements:

- Stakeholder analysis and planning;
- Disclosure and dissemination of information;
- Consultation and participation;
- Grievance mechanism; and
- On-going reporting to Affected Communities.

The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project’s risks and adverse impacts, and the project’s phase of development.”

### **Stakeholder Analysis and Engagement Plan**

The IFC Performance Standards requires clients to identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders. Where projects involve specifically identified physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts to Affected Communities the client will identify the Affected Communities and will meet the relevant requirements described below:

- The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities.
- Where applicable, the Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable.
- When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents.

### **Disclosure of Information**

The IFC Performance Standards for SEP requires clients to disclosure relevant project information, to help Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. The Affected Communities must be provided with the following:

- The purpose, nature, and scale of the project;
- The duration of proposed project activities;
- Any risks to and potential impacts on such communities and relevant mitigation measures;
- The envisaged stakeholder engagement process;
- The grievance mechanism.

### **Consultation**

The IFC Performance Standards indicate that when Affected Communities are subject to identified risks and adverse impacts from a project, the developer/client will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them. Effective consultation is a two-way process that should:

- Begin early in the process of identification of environmental and social risks and impacts and continue on an on-going basis as risks and impacts arise;
- Be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities;
- Focus inclusive engagement on those directly affected as opposed to those not directly affected;
- Be free of external manipulation, interference, coercion, or intimidation;
- Enable meaningful participation, where applicable; and
- Be documented.

### **Grievance Mechanism**

The Performance Standards indicate that where there are Affected Communities, the clients will establish a grievance mechanism to receive and facilitate resolution of Affected Communities concerns and grievances about the client's environmental and social performance. The client will ensure that the grievance mechanism will be scaled to the risks and adverse impacts of the project and have Affected Communities as primary beneficiaries. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism in the course of the stakeholder engagement process. Furthermore, the client will implement and maintain a procedure for external communications that includes methods to:

- Receive and register external communications from the public;
- Screen and assess the issues raised and determine how to address them;
- Provide, track, and document responses, if any; and
- Adjust the management program, as appropriate. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability

### **On-going Reporting to Affected Communities**

The client will provide periodic update reports to the Affected Communities that describe the progress and the implementation of the project's Action Plans on issues that involve on-going risks or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. If the management program results in material changes or additions to the mitigation measures or actions described in the Action Plans on issues concerning the Affected Communities, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of Affected Communities but it will not be less than annually.

### 3 STAKEHOLDER ENGAGEMENT FOR THE PROJECT

Stakeholder engagement can be described as the systematic method to understand and involve stakeholders and their concerns in project activities and decision-making processes. It identifies the appropriate approach to be used for consultation and information disclosure.

The Stakeholder Engagement Plan Report (SEP) for the Taweelah IWP Project has been prepared to guide stakeholder engagement for the project. The Stakeholders included in this plan include persons or groups that may be directly or indirectly affected by the project, as well as those that may have interest in the project and/or those that may influence the projects outcome either positively or negatively. These stakeholders may change over time and as such this plan will need to be updated as and when new stakeholders are identified, or the circumstances of stakeholders evolve.

The SEP has been prepared according to the best practice requirements outlined in the IFC Handbook on Stakeholder Engagement<sup>1</sup> (which is considered suitable to meet the EP and PS requirements stated herein) and will assist in managing communications between the Project and identified stakeholders.

It should be recognised that the SEP is a living document and will be utilised throughout the lifecycle of the project (within the ESMS) in order to guide the necessary engagement with identified stakeholders at the various project phases. In this instance, the SEP cannot be considered definitive for the lifetime of the project. As such, the SEP will evolve over time as the project progresses, and will be updated as necessary to include any relevant changes (e.g. new processes, requirements, affected stakeholders, changes to engagement methods, etc.).

---

<sup>1</sup> IFC, 2007, Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.

## 4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

This section of the SEP identifies the key stakeholder groups and analyses how they may be affected by the project, at the respective project stages.

Typical examples of potential stakeholders may include local communities, households being physically or economically displaced, local organizations and government authorities. Stakeholders may also include politicians, companies, academics, religious groups, national social and environmental public-sector agencies, and the media.

### 4.1 Approach to Stakeholder Identification

A systematic approach to identify affected stakeholders has been used. This approach not only consider the projects but also put into consideration associated facilities, transport routes and areas potentially affected by cumulative impacts. The stakeholders identified have been classified into two categories:

- Impacted Stakeholders – those who can be potentially affected by one or more of the potential impacts of the project; and
- Interest-based Stakeholders – Stakeholders concerned with any of the procedures set by the project, the project's beneficiaries, national and international non-governmental organizations and the interested part of the civil society.

#### 4.1.1 Impacted Stakeholders

The Impacted stakeholders are individuals or group of people that could be potentially affected by the projects' environmental and social impacts either directly or indirectly. Potential environmental and social impact of the project have been identified and assessed in the Environmental and Social Impact Assessment (ESIA) and are related to Air Quality, Marine Water, Sediment and Ecology, Waste Management, Geology, Seismicity, Soil and Groundwater, Terrestrial Ecology, Noise, Traffic, Archaeology and Cultural Heritage, Socio-Economic, Landscape and Visual Amenity, Community Health, Safety & Security and Workers Condition & Occupational Health & Safety.

The project geographic area of influence originally identified in the EAD approved TOR which includes the project's site as well as associated facilities of the project has been used to determine who might be affected either directly or indirectly by the project's environmental and social impacts.

Based on the projects' footprint and area of influence, the project will not involve any resettlement of communities or land acquisition. Therefore, private landowners have not been identified as impacted stakeholders.

Identified stakeholders that can potentially be affected by environmental and social impacts during construction or operation as a result of their proximity to the project boundary are listed in the table below.

**Table 4-1 Identified Potentially Impacted Stakeholders**

IMPACTED STAKEHOLDERS	DESCRIPTION	JUSTIFICATION
Taweelah Complex	A desalination and power complex located directly to the north of the proposed project site.	The proposed project will be a direct neighbour to the Taweelah Complex and dialogue will be required in order to ensure future emergency preparedness and response plans are aligned
Khalifa Port	Commercial port located 2km from the project site	Khalifa Port has an operational outfall on the southern boundary of the Khalifa Port.
Emirates Global Aluminium (EGA) alumina refinery	Located 4km northeast of the proposed project	EGA is the predominant user of the Abu Dhabi Port outfall. EGA discharges waste brine effluent and cooling water from its industrial processes.
KIZAD Area A	Located approximately 3km north of the project site	Exposure to potential impacts relating to changes in ambient air quality, noise and vibration, increased traffic(safety) etc. and consideration for potential grievances.
CICPA/Etiscalat submarine	Located approximately 45 m northwest of the project site	Exposure to construction impacts relating to excavation, health and safety of the workers etc.
Dolphin Gas Pipeline	Gas pipeline cutting across the extreme south of the project site.	
Emirates Heritage Club marina	Located approximately 3km north of the project site	Exposure to potential impacts relating to changes in ambient air quality, noise and vibration, increased traffic(safety) etc. and consideration for potential grievances.
Al Hanjurah	Residential farm area with buildings located approximately 400-500 m of the project site.	Exposure to potential impacts relating to changes in ambient air quality, noise and vibration, increased traffic(safety) etc. and consideration for potential grievances.
Marine Protected Area	An ecologically protected area 7km north east of the project site.	Exposure to potential marine impacts

#### 4.1.2 Interest Based Stakeholders

Interest-based stakeholders are groups or organizations that are not adversely affected by the project but whose interests determine them as stakeholders. In addition, there are stakeholders outside the affected area, which can be identified through “interest-based” analysis. These are usually government authorities and national, social and environmental public-sector agencies whose area of interest is related to the project, or where such organisations are undertaking projects with communities in these areas.

The identified interest-based stakeholders for the project together with the project interests, stake holding and information requirements are presented in the table below.

**Table 4-2 Identified Interest-Based Stakeholders**

Stakeholders Group	Interest-based Stakeholders	Project interest/Stake holding
National Government Agencies	UAE Ministry of Climate Change & Environment	Mission is to work with Partners to Protect the Environment, Preserve and Develop their Resources and Invest in them Efficiently to Ensure their Sustainability.
	UAE Ministry of Energy and Industry	Organizing and developing energy, water, mining and industry sectors through setting and developing public policies, legislation, strategies and building partnerships in cooperation and coordination with concerned entities.
	Environment Agency Abu Dhabi	EAD governs all matters directly relating to the environment in Abu Dhabi
	Critical Infrastructure & Coastal Protection Authority (CICPA)	Authority responsible of providing security and safety all critical infrastructure and establishments across Abu Dhabi
Local Government/Institutions	Abu Dhabi Department of Energy	Project Proponent with interest in the development of the project
	Emirates Water and Electricity Company (EWEC)	Emirates Water and Electricity Company (EWEC)
	Abu Dhabi Department of Transportation	Interest in the development of the project (e.g. the transportation routes to be used by construction & operation vehicles, impacts of increased vehicle flow etc.)
	Department of Urban Planning and Municipalities	Plays an important role in driving and supporting Abu Dhabi’s urban development strategy

Stakeholders Group	Interest-based Stakeholders	Project interest/Stake holding
	Abu Dhabi Department of Economic Development	Plays an important role in leading the economic agenda in the Emirate of Abu Dhabi.
	Abu Dhabi Ports/KIZAD	Future expansion of the port may have potential effects on the proposed plant.
Project Lenders	Lending Financial Institutions	Key interest in the development and project success. Interest includes potential environmental and social risks related to the project.

## 5 STAKEHOLDER ENGAGEMENT PROGRAMME

Stakeholder engagement is an on-going process that will be undertaken during the construction and operational phases of the project. The process intends to be transparent, free of intimidation, interference and coercion. The aim of this section is to describe what information will be disclosed, in what formats, the types of methods that will be used to communicate information and the consultation methods to be used with each of the stakeholder groups identified in the previous sections.

### 5.1 Engagement Methods

The following methods will be used to inform stakeholders about the on-going stakeholder engagement process during construction and operations of the project:

- Letters and email - Suitable to engage interest-based stakeholders listed in Section 4.1.2 and to notify them of the engagement and disclosure mechanisms.
- Bilateral meetings- Suitable to engage stakeholders listed in Sections 4.1.2, to allow these stakeholders provide their views and opinions and to notify them of the engagement and disclosure mechanisms.
- Online – Useful for Interest-based Stakeholders. The engagement and disclosure mechanisms for the ESIA package during the construction and operational phases of the project will be disclosed on ACWA Power's website with a contact point provided for comment.

### 5.2 Public Disclosure of ESIA

The ESIA for the project has been submitted to EAD for review and approval.

**Table 5-1 ESIA Public Disclosure Timetable**

Activity	Stakeholders	Engagement Method	Timing and Frequency
Disclosure of ESIA	All identified stakeholder (impacted and interest-based).	Once approved and acceptable by the lenders, the ESIA and this SEP will be fully disclosed online in English and as a Non-Technical Summary in both English and Arabic. The ESIA is expected to be available at ACWA Power prior to financial close. Where appropriate, stakeholders have the opportunity to comment or request additional information during this disclosure period.	Minimum 30-day disclosure period prior to financial close.

### 5.3 ESIA Consultations and Stakeholder Engagement

Stakeholder identification and consultation has been an ongoing process for the Taweelah Project for the last two years, even before the project bidding stage (reference the table below for the list of stakeholders identified and the dates of consultation meetings). The methods used for the on-going stakeholder engagement process include bilateral meetings, emails and telephone calls. Public consultations and public meetings are not allowed under the UAE national law although for this project there has been in-depth consultation with government entities and commercial interested parties to ensure that any project concerns are addressed within the project design and ESIA.

Since the IWP will be located in the Taweelah Complex under the security of Critical Infrastructure & Coastal Protection Authority (CICPA) the impact on receptors other than commercial/industrial is limited to Al Hanjarah Estate which is understood to be under the Abu Dhabi Royal family and as such, consultation is expected to have occurred at the highest government level. Access to this estate is restricted and occupancy is unknown although nearest buildings are between 400m and 500m from the south-western boundary with the IWP site, beyond the cooling water channel for the Taweelah Complex.

**Table 5-2 List of Stakeholder Identified and Consulted**

ID	NAME	REASON FOR INCLUSION	Yes/No	DATES OF MEETINGS/LETTERS
1.	UAE Ministry of Climate Change & Environment	Mission is to work with Partners to Protect the Environment, Preserve and Develop their Resources and Invest in them Efficiently to Ensure their Sustainability.	Yes	<ul style="list-style-type: none"> <li>Project approval would have been obtained from the consultation within UAE government ministries as part of strategic planning process.</li> </ul>
2.	UAE Ministry of Energy and Industry	Organizing and developing energy, water, mining and industry sectors through setting and developing public policies, legislation, strategies and building partnerships in cooperation and coordination with concerned entities.	Yes	<ul style="list-style-type: none"> <li>Several times during the bid and at post bid stage</li> </ul>
3.	Environment Agency Abu Dhabi	EAD governs all matters directly relating to the environment in Abu Dhabi	Yes	<ul style="list-style-type: none"> <li>4th March 2019 – EAD Office – ACWA, 5 Capitals, HDR and HR Wallingford met with EAD to review the updated to the project EIA</li> <li>23 April 2019: Site Clearance issue</li> <li>22nd May 2019-EAD offices- to discuss the marine modelling report (EAD, ACWA Power, HR Wallingford, HDR, 5 Capitals)</li> </ul>
4.	Abu Dhabi Department of Energy	Project Proponent with interest in the development of the project	Yes	<ul style="list-style-type: none"> <li>Several times during the bid and at post bid stage</li> </ul>
5.	Abu Dhabi Department of Transportation	Interest in the development of the project (e.g. the transportation routes to be used by construction & operation vehicles, impacts of increased vehicle flow etc.)	Yes	<ul style="list-style-type: none"> <li>5 May 2019: EPC Contractor registration</li> </ul>
6.	Department of Urban Planning and Municipalities	Plays an important role in driving and supporting Abu Dhabi's urban development strategy	Yes	<ul style="list-style-type: none"> <li>20 April 2019: OSHAD registration</li> </ul>
7.	Abu Dhabi Department of Economic Development	Plays an important role in leading the economic agenda in the Emirate of Abu Dhabi.	Yes	<ul style="list-style-type: none"> <li>14 April 2019: EPC Contractor for Commercial registration</li> </ul>

ID	NAME	REASON FOR INCLUSION	YES/NO	DATES OF MEETINGS/LETTERS
8.	Taweelah Desalination and Power Complex	The proposed project will be a direct neighbour of the Taweelah Desalination and Power Complex and may require items of common management such as co-ordination for emergency planning.	Yes	<ul style="list-style-type: none"> <li>4<sup>th</sup> April 2019: Meeting for interface between the Project and Taweelah Existing Facilities</li> </ul>
9.	Critical Infrastructure & Coastal Protection Authority (CICPA)	Authority responsible of providing security and safety all critical infrastructure and establishments across Abu Dhabi	Yes	<ul style="list-style-type: none"> <li>Since 7<sup>th</sup> Feb 2019, several times for CICPA entry permits</li> </ul>
10.	Dolphin Energy	The Dolphin Gas Pipeline corridor measuring approximately 20 meters in width transports natural gas and is located south west of the project site	Yes	<ul style="list-style-type: none"> <li>Since 23<sup>rd</sup> April 2019, several times for Dolphin NOC application and interface management between the Project and Dolphin facilities</li> </ul>
11.	Emirates Water and Electricity Company (EWEC)	Authority in charge of water production and energy generation in Abu Dhabi	Yes	<ul style="list-style-type: none"> <li>Many times, regarding the development of the Project</li> </ul>
12.	Abu Dhabi Ports/KIZAD	<p>The Khalifa Port is located 2km from the project site and has an operational outfall on the southern boundary of the Khalifa Port.</p> <p>Future expansion of the port may have potential effects on the proposed plant.</p>	Yes	<ul style="list-style-type: none"> <li>Since Feb 2019, several times for marine modelling data and site clearance NOC application</li> <li>11<sup>th</sup> March 2019 – KIZAD office – ACWA, 5Cs and HR Wallingford met with ADP/KIZAD environmental team</li> <li>2<sup>nd</sup> April 2019 – ADP HQ – ACWA and HR Wallingford met with ADP/KIZAD</li> </ul>
13.	Emirates Global Aluminium (EGA)	Located 4km northeast of the proposed project and is the predominant user of the Abu Dhabi Port outfall. EGA discharges waste brine effluent and cooling water from its industrial processes.	Yes	<ul style="list-style-type: none"> <li>2<sup>nd</sup> April 2019 – EGA provided intake and outfall characteristics by email to ACWA</li> <li>3<sup>rd</sup> April 2019 – EGA provided further clarifications on intake and outfall characteristics by email to ACWA</li> </ul>

## 5.4 Stakeholder Engagement During Construction

Stakeholders most likely to be affected by construction activities will continue to be engaged leading up to and during the physical construction of facilities and infrastructure. Stakeholder engagement during construction will allow stakeholders to assess whether measures are working as intended, if grievances are being responded to and identifying alternatives where there are failings. Effective management of stakeholder engagement during the construction phase is important as it can set the tone for the remainder of the project (ref. IFC, Handbook for Stakeholder Engagement).

**Table 5-3 Construction Phase SEP timetable**

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Notify stakeholders of construction activities and construction timeline.	<ul style="list-style-type: none"> <li>Abu Dhabi Department of Energy</li> <li>Abu Dhabi Department of Transportation</li> <li>Department of Urban Planning and Municipalities</li> <li>Emirates Water and Electricity Company (EWEC)</li> <li>Critical Infrastructure &amp; Coastal Protection Authority (CICPA)</li> <li>Abu Dhabi Ports/KIZAD</li> <li>Taweelah Desalination and Power Complex</li> <li>Dolphin Energy</li> <li>Emirates Global Aluminium (EGA)</li> </ul>	<p>Official letters will be sent to the identified stakeholders to inform them about all construction activities including the construction of associated facilities.</p> <p>Bilateral meetings will be held where necessary</p>	<p>Prior to the start of construction and updated as necessary within the construction phase if there are changes to construction activities or processes.</p>
	<ul style="list-style-type: none"> <li>Emirates Heritage Club marina</li> <li>Al Hanjurah</li> </ul>	<p>Official emails or letters will be sent to provide information on construction activities &amp; timeline.</p>	
Communication of emergency preparedness and action plan	<ul style="list-style-type: none"> <li>Critical Infrastructure &amp; Coastal Protection Authority (CICPA)</li> <li>Taweelah Desalination and Power Complex</li> </ul>	<p>Meeting with the CICPA officials and Taweelah Complex HSE Managers and emergency response team to outline and familiarise with the emergency drills and emergency response plan for</p>	<p>Prior to the start of construction and updated if key changes to the emergency preparedness and response plan occur.</p>

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
	<ul style="list-style-type: none"> <li>• Abu Dhabi Ports/KIZAD</li> <li>• Dolphin Energy</li> <li>• Emirates Global Aluminium (EGA)</li> <li>• Project Lenders</li> </ul>	<p>the facilities in the event of an emergency.</p> <p>Official letters informing the stakeholders about the emergency response procedures in place and any required co-ordination for specific events.</p> <p>Bilateral meetings will be held where necessary.</p>	
Independent Environmental & Social Monitoring & Reporting	Project Lenders	Environmental and Social auditing to check projects compliance with UAE standards and IFC Performance Standards and EHS Guidelines.	On a quarterly basis throughout construction phase of the project.
Implementation of grievance mechanism	All identified stakeholders (impacted and interest-based) – including project workforce	As described in the grievance mechanism section of this SEP (Section 6).	Established at the start of construction and updated throughout the construction phase to facilitate rapid and effective response.

## 5.5 Stakeholder Engagement During Operation

Stakeholder engagement during the operational phase of the project will be the responsibility of the company contracted for operations management. It will be important for the Project Owners and O&M Company to ensure a smooth transition between stakeholder engagements from construction phase to operational phase of the project by understating the techniques that have been most effective during construction. It will be important to continue these techniques to avoid decrease in the frequency of stakeholder engagements, as the stakeholders are already familiar with the typical processes for engagement.

**Table 5-4 Operational Phase SEP Timetable**

ACTIVITY	STAKEHOLDERS	MODE OF ENGAGEMENT	TIMING AND FREQUENCY
Notify stakeholders of the transition from construction to operations	<ul style="list-style-type: none"> <li>Abu Dhabi Department of Energy</li> <li>Abu Dhabi Department of Transportation</li> <li>Department of Urban Planning and Municipalities</li> <li>Emirates Water and Electricity Company (EWEC)</li> <li>Critical Infrastructure &amp; Coastal Protection Authority (CICPA)</li> <li>Taweelah Desalination and Power Complex</li> <li>Abu Dhabi Ports/KIZAD</li> <li>Dolphin Energy</li> </ul>	<p>Official letters to provide information about transitioning and commencement of operations.</p> <p>Bilateral meetings will be held where necessary.</p>	At least 2 months prior to commencement of operations
	<ul style="list-style-type: none"> <li>Emirates Global Aluminium (EGA)</li> <li>Emirates Heritage Club marina</li> <li>Al Hanjurah</li> </ul>	<p>Official emails or letters to provide information about transitioning and commencement of operations.</p>	
Communication of emergency preparedness and action plan	<ul style="list-style-type: none"> <li>Critical Infrastructure &amp; Coastal Protection Authority (CICPA)</li> <li>Taweelah Desalination and Power Complex</li> </ul>	<p>Meeting with CICPA officials and Taweelah Complex HSE Managers and emergency response team to outline and familiarise with the emergency drills and emergency response plan for the facilities in the event of an emergency.</p>	<p>2 months prior to the commencement of operations and periodical practice drills to maintain level of awareness. Updates to emergency plan if key changes occur.</p> <p>2 months prior to the commencement of operations and updated if key changes to the plan occur.</p>
	<ul style="list-style-type: none"> <li>Abu Dhabi Ports/KIZAD</li> <li>Dolphin Energy</li> <li>Emirates Global Aluminium (EGA)</li> <li>Project Lenders</li> </ul>	<p>Official letters and emails informing the stakeholders about the emergency response procedures in place.</p>	
Independent Environmental & Social Monitoring & Reporting.	<ul style="list-style-type: none"> <li>Project Lenders</li> </ul>	<p>Environmental and social auditing to check projects compliance with UAE standards and IFC Performance</p>	<p>On an annual basis throughout operational phase of the project.</p>

ACTIVITY	STAKEHOLDERS	MODE OF ENGAGEMENT	TIMING AND FREQUENCY
		Standards and EHS Guidelines.	

## 5.6 On-going Disclosure of Environmental and Social Information

Disclosure of relevant environmental and social information is essential as it helps stakeholders understand the project and identify potential risks, impacts and opportunities throughout the life of the project. The Project will be responsible for providing stakeholders with complete, updated, accurate and understandable information, as this is essential to ensure meaningful participation of the stakeholders at every stage of the project. Stakeholders will be provided with access to the following information:

- The purpose, nature, and scale of the project;
- The start date and duration of proposed project activities;
- Any risks to and potential environmental and social impacts on such communities and relevant mitigation measures;
- The stakeholder engagement process and;
- The grievance mechanism.

### 5.6.1 Periodic Independent Monitoring and Reporting

Independent monitoring and reporting of environmental and social impacts of the project will be required to be undertaken periodically, during construction and operational phase of the project as per the Lenders Requirement<sup>2</sup>. It is proposed that quarterly audits will be undertaken during construction and annual audits during operation (to be confirmed by Lenders Environmental & Social Action Plan).

All audit reports will include a Non-Technical Summary (NTS) describing the auditing process, any identified non-conformances, how non-conformances identified in the previous audits have been closed out and comments to improve environmental & social performance to prevent potential future non-conformances. The NTS will also include a summary of the grievances received and how each of them was addressed and closed out. The full technical

<sup>2</sup> Equator Principles 9: Independent Monitoring and Reporting

---

audit report will be available on request, but some specific technical details (e.g. construction or operational aspects) might not be disclosed due to confidentiality reasons. The Audits NTSs will be disclosed to the Project Lenders (IFC and any other lenders involved).

## 6 GRIEVANCE MECHANISM

The projects aspects (during construction and operation) may result in potential environmental and social impacts and as such it is required to establish a grievance mechanism to address potential complaints from affected parties. The grievance mechanism will use an understandable and transparent process that is culturally appropriate and readily accessible at no cost; so, all stakeholders/affected parties will have the opportunity to raise a complaint.

In accordance with good practices, the grievance mechanism is an important part of stakeholder engagement and should be in place from the onset of the environmental and social assessment process, throughout construction and operations through the end of the project life.

The aim of the grievance mechanism is establishing a system to receive and facilitate resolution of the stakeholder's concerns and grievances about the project's environmental and social performance.

The implementation of the grievance mechanism for the project will fall under separate parties depending whether the grievance is related to the construction or the operational phases.

### 6.1 Key Principles of Grievance Mechanism

The grievance mechanism for the project will comply with the following principles:

- The purpose of the grievance mechanism procedure will be clarified at the outset;
- The process will be scaled to the risks and impacts of the project;
- The process will be transparent and accountable to all stakeholders by putting it into writing, publicising it and explaining it to relevant stakeholders;
- The grievance mechanism will be made clear, understandable and easily accessible by providing information in the local language;
- Complaints or concerns will be rapidly resolved;
- The mechanism will not involve any costs nor retribution associated with lodging a grievance;
- Precautionary measures such as clear non-retaliation policy, confidentiality measures and safeguarding of personal data collected in relation to a complaint, as well as an option to submit grievances anonymously will be in place.

## 6.2 Scope of Grievance Mechanism

The scope of the grievance mechanism is to evaluate and address stakeholders' problems and concerns regarding project activities, the implementation of mitigation and compensation measures as per the ESIA and environmental and social performance of the project. All relevant claims from affected communities will be accepted and no judgment made prior to investigation, even if complaints are minor. However, according to good practice, the following claims should be directed outside of project-level mechanisms:

- Complaints clearly not related to the project based on assessment of its legitimacy;
- Issues related to governmental policy and government institutions;
- Complaints constituting criminal activity and violence, which should be referred to the justice system;
- Commercial disputes: Commercial matters should be stipulated for in contractual agreements and issues should be resolved through a variety of commercial resolution mechanisms or civil courts.

## 6.3 Steps in Managing Grievance Mechanism

### 6.3.1 Publicising Grievance Management Procedures.

The grievance mechanism of this project will be publicised using the means described in Section 5.1. The information provided will be available in both English and Arabic and will include the following:

- What project-level mechanisms are capable of delivering and what benefits complainants can receive from using the company's grievance mechanism, as opposed to other resolution mechanisms;
- Who can raise complaints (i.e. all stakeholders);
- Where, when, and how community members can file complaints;
- Who is responsible for receiving and responding to complaints;
- What sort of response complainants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

### 6.3.2 Submitting a Grievance

Upon raising awareness and publicising the mechanism, grievances will be submitted by:

- Submission by post or email; and



### 6.3.4 Reviewing and Investigating Grievances

Depending on the circumstances of complaints made, various departments may need to be involved in resolving the complaints. The person(s) responsible for handling grievance will organize the process to validate the complaints legitimacy and arrange for investigation of details.

When grievances are complex and cannot be resolved quickly, an extensive investigation may be required to prevent escalation of the issue. The EPC contractor and O&M company responsible for construction works and operation activities respectively will be responsible for investigating the details of grievances received through the grievance mechanism in order conform to the principle of “no cost to communities”. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget. Meetings with complainants and site visits will be undertaken, as appropriate.

In cases of sensitive grievances - such as those involving multiple interests - it may help to engage outside organizations in a joint investigation, or allow for participation of local or national authorities only if the complainants agree to this approach.

### 6.3.5 Grievance Resolution Options and Response

The approach used in resolving various types of grievances will be different depending on the nature of the issue, frequency of occurrence and the number of grievances. Rather than prescribing a specific procedure for each particular type of complaint, the flexibility of the grievance mechanism allows for a list of possible options appropriate for different types of grievances to be provided. These options include altering or halting harmful activities or restricting their timing and scope (e.g. for construction access road noise), providing an apology, providing monetary compensation and revising the stakeholder engagement strategy.

The solution to the grievance will be communicated to the grievant either orally or verbally depending on what format the grievant has selected as preferred. In cases where the grievance/claim is rejected or where the company does not require action, the company representative will be diplomatic when informing the grievant about the outcome of the resolution process so as to prevent conflict from escalating. Where the claim is accepted, a proposed solution will be provided and communicated to the grievant within a stipulated period. If the grievant does not accept the proposed resolution, the company would re-assess the situation, discuss and clarify the finding with the grievant and make sure that all alternatives within the grievance mechanism are explored. If the grievant is still not satisfied with the proposed resolution, the grievant will be allowed to take the dispute resolution mechanism outside of the company grievance mechanism (external mechanism).

Where a proposed solution is accepted or agreed upon by all parties involved, the case will be closed out and proof that necessary actions have taken place will be collected. Such proof includes:

- Conducting a meeting with the complainant to get a collective agreement or get a confirmation and file it along with the case documentation to close out the claim and;
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how they were resolved.

## 6.4 Grievance Mechanism in Construction Phase

The construction phase will require two separate grievance mechanisms to be implemented for the following parties:

- Internal parties; Construction personnel, workers, project staff, (including sub-contractors' staff and visitors);
- External parties.

The EPC contractor will manage internal and external grievance mechanisms. A member of staff will be assigned the responsibility to receive and follow up on all grievances. Grievances will be investigated by the EPC contractor and may require co-ordination with the project company or other sub-contractors. All received grievances will be acknowledged within a week of receipt, or quicker depending on the urgency of the grievance.

Adequate resources will be allocated to the assigned staff member responsible for managing stakeholder engagement. This designated staff member will also be responsible for following up and managing grievances. An additional team or part of an existing team may support the member of staff; however, the staff will be experienced in engagement processes and will be familiar with the lender requirement for stakeholder engagement.

### 6.4.1 Internal Parties Grievance Mechanism

The internal grievance mechanism will be made available for all construction personnel associated with construction activities to enable them make work related concerns. This includes all those employed by the Project Company, EPC contractor, sub-contractors, any other related contractors and project site visitors. All construction personnel will be made aware of the grievance mechanism during their employment inductions at the project site and in employment documents. The EPC Contractor will also encourage sub-contractor companies to also implement a similar grievance system on a basis for sub-contractor level internal complaints.

Grievances of construction personnel will be made in writing to the EPC Contractor via a specific grievance form (see example grievance form in Appendix A). The grievance form will be made available at key locations on-site (e.g. administration block, canteen area, and office locations) as well as at any staff accommodation area. The grievance form will be available in Arabic, English and any other languages of project staff. Where the complainant is illiterate, the complaint can be made verbally in confidence to a manager, so that the manager will complete the grievance form on behalf of the grievant.

Grievance forms will include contact details of the complainant; however, a grievance can be raised anomalously if desired. Grievance forms will be posted in a sealed and locked 'post box', located at all key locations where grievance forms are available. The post box will be checked on a regular schedule several times a week.

Responses to grievances will be transparent and free of retribution. Follow-up to grievances will be completed on a grievance follow up form and signed off by the EPC Contractors grievance control representative. The follow up form will state all actions taken to resolve the grievance and any further dialogue that had ensued, as well as any future monitoring of the situation or other planned actions. The completed and signed off forms will be kept in a dedicated grievance mechanism folder on site, which will be made available for review to the external independent environmental and social auditors during the periodic environmental and social audits required during the construction phase.

#### 6.4.2 External Parties Grievance Mechanism

The project site is located within a CICPA protected area and access to the site is granted through issuance of special CICPA passes. Therefore, external parties may not be able to physically submit their grievances at the site entrance. Therefore, grievance forms will be made available on the website of the project including contact details of the E&S manager.

A grievance mechanism will be developed to assist external parties to make grievances via post and/or mail. These will also be formally recorded as explained in section 6.3.3 including the date grievance form was received, key issue raised, company staff responsible for addressing the complaint, status of action, etc. In cases of sensitive grievances - such as those involving multiple interests - it may help to engage outside organizations in a joint investigation only if the complainants agree to this approach.

If the grievant does not accept the proposed solution provided by the company, the company would re-assess the situation, organise a meeting with the complainant to discuss and clarify the findings. Once an agreement is reached, formal recordings of the whole process from grievance submission to grievance resolution will be prepared, properly documented and shown to the external independent qualified consultant during periodic Independent Environmental and Social Monitoring.

## 6.5 Grievance Mechanism in Operational Phase

The grievance mechanism in the operational phase of the project will be similar to that of the construction phase. The grievance mechanism will be available for both internal parties (site workers) and external parties.

A member of staff will be assigned and responsible for managing internal and external grievances received (recording, reviewing, investigating and responding) appropriately. Internal grievance forms will be made available in Arabic and English at key locations on-site with a sealed and locked 'post box' available for posting grievance at every location. The post box will be checked regularly.

External grievance forms will be made available in both English and Arabic on the project's website. The process for recording, reviewing, following up and responding to will be the same as detailed in Section 6.3. All grievances during operations will be recorded for a minimum of 5 years, with records being kept on site.

Where external complaints are received by letters or email these will also be formally recorded and followed up appropriately by the designated representative. The contact details of the E&S Manager will be advertised at the project website, once the individual has been appointed.

## 7 MONITORING AND REPORTING

### 7.1 Independent Periodic Monitoring

Equator Principle 9 requires periodic independent environmental and social monitoring of construction and operational activities during the period of the loan agreement. As stated herein, the periodic independent environmental and social monitoring of the project will be undertaken by an independent qualified consultant who has experience in working with the requirements of international financial institutions. Such periodic audits are recommended on a quarterly basis (every 3 months) during construction and on an annual basis during operations as a minimum to ensure the projects' compliance with environmental and social standards and requirements.

The auditing process will seek to report good environmental practices as well as reporting non-compliances where necessary. Non-compliances will relate to specific breaches of the applicable environmental & social standards/regulations or the site-specific environmental & social management plans.

The assigned independent consultant will prepare environmental and social audit reports that will include a non-technical summary, which will then be submitted to the lenders for review. Distribution of audit reports to interested parties other than the lenders will be at the discretion of the Project Company.

### 7.2 Reporting

Besides the reporting of the independent environmental and social monitoring reports detailed above, the project may wish to report back to stakeholders on the project, or its compliance to respective environmental & social standards. The mechanisms for such reporting have not yet been decided. It may however include the following recommended methods based on the lenders requirements to provide periodic updates to stakeholders.

- Periodic reporting of the projects' compliance with environmental and social standards in formats accessible and understandable;
- Periodic reporting on on-going risk to or increase in environmental and social impacts as a result of projects' activities.
- Display of key project statistics and environmental compliance at the project main entrance;

## 8 IMPLEMENTATION PLAN

In order for this stakeholder engagement plan to function effectively, it is important to determine a management structure and assign suitable personnel(s) to implement and manage this Stakeholder Engagement Plan.

### 8.1 Roles and Responsibilities

The responsibilities of the HSE Manager, Environmental and Social Manager and Community Liaison Officer are as outlined below. It is acknowledged that these positions may not exist as in the titles below (i.e. Community Liaison Officer) but the roles and responsibilities will be assigned according to the management structure.

#### 8.1.1 HSE Manager

<b>Name</b>	To be confirmed
<b>Contact Details</b>	

The HSE Manager is responsible for:

- Ensuring stakeholders are recognised as partners in the development and delivery of strategic goals;
- Assisting the stakeholder management unit to effectively consult and engage stakeholders;
- Advising Senior Management of issues and/or risks to stakeholder relationship as soon as they arise so risk can be managed effectively;
- Supporting the implementation and management of the SEP;
- Getting involved in stakeholder engagement activities that relate directly to HSE concerns or emergency planning and;
- Engaging with any external stakeholders with respect to emergency planning, drills, and instances of emergency as appropriate.

#### 8.1.2 Environmental and Social Manager

<b>Name</b>	To be confirmed
<b>Contact Details</b>	

The EPC Contractor will employ/nominate the Environmental and Social Manager during the construction phase and the O&M Company during the operation phase. The Project Company HSE Manager will oversee the Environmental and Social Manager. The Environmental and Social Manager is responsible for:

- Implementation of all aspects of the SEP ensuring that the project is compliant with lenders requirements;
- Identifying stakeholder issues and acting appropriately to address those issues.
- Ensuring that the SEP and the available engagement methods are publicised by the Community Liaison Officer;
- Ensuring that project personnel are well briefed in regard to the SEP and grievance mechanism (including security personnel), and that the required resources (e.g. vehicles, company phones, office materials) are provided;
- Ensuring stakeholder meeting and disclosure of information are managed properly.
- Supervising the processing and resolution of all grievances; and
- Supervising the independent periodic monitoring and disclosure of the non-technical summary of the audit reports and of the full reports if required.

### 8.1.3 Community Liaison Officer

<b>Name</b>	To be confirmed
<b>Contact Details</b>	

In order to maintain regular communication with affected stakeholders, a Community Liaison Officer (CLO) will be employed/nominated (this role may be shared by the nominated E&S Manager). The CLO will be knowledgeable about the project region and will be able to speak local language. The responsibilities of the CLO include:

- Identifying, informing and recording public views, opinions & grievances and or relaying them to the necessary personnel for follow up;
- Setting up a grievance complaint tracker system to keep track of the type of complaints filed, the complainant and status of each complaint;
- Publicising & Distributing information to applicable stakeholders and translation of the material into applicable languages;
- Handling minor, straightforward issues such as those related to a complainant's request for information;
- Obtaining clarification from other members of management in regard to dealing with specific grievances, such as a need to notify the Project Company (or other Project parties) in regard to the content or response to specific grievances.
- Ensuring all received external grievances are properly recorded, addressed and managed within the specified timelines as detailed in this procedure and;
- Keeping up to date with any changes in compliance obligations with respect to stakeholder engagement and grievances.

---

## 8.2 Timeline

The positions outlined in section 8.1 will be filled before the start of construction and operation to ensure that all the requirements of the SEP are implemented as soon as the first construction activities start onsite.

---

## 9 REVIEW

As stated herein, the SEP is a living document that will be utilised in the ESMS throughout the project's lifecycle as a reference document. As such, there is a need to continuously update the SEP as necessary to include any relevant changes such as changes in projects circumstances, new requirements, new affected stakeholders, reviews of techniques, changes to engagement methods, changes of relevant personnel, changes to grievance mechanism, etc.

As a minimum, the SEP will be reviewed on an annual basis, with the aim of achieving continual improvement.

## APPENDIX A – EXAMPLE OF GRIEVANCE FORM

<b>GRIEVANCE FORM</b> <i>To be used for grievance(s) only. Shall not be used to raise comments, suggestions, or/and inquires or any other matters</i>	
INSTRUCTIONS	Please fill in this Grievance form in clear handwriting and submit through one of the following means: <ul style="list-style-type: none"> <li>- Directly to Environmental &amp; Social Manager</li> <li>- By email to:</li> <li>- Deposit in the letter box at the Project main entrance</li> </ul>
Full Name	First Name:
	Last Name:
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> I wish to raise my grievance anonymously ( <i>You can remain anonymous if you prefer but we will not be able to contact you with a response to your concern</i> )
	<input type="checkbox"/> By Post: <i>Please provide mailing address:</i>
	<input type="checkbox"/> By telephone: <input type="checkbox"/> By email:
Preferred Language of Communication	<input type="checkbox"/> English
	<input type="checkbox"/> Arabic
Description of Incident/Grievance	<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>
Date of Incident/Grievance	<input type="checkbox"/> One time incident/grievance (date...)
	<input type="checkbox"/> Happened more than once (how many times?....)
	<input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Signature:	
Date:	