# Ibri II Solar Independent Power Project (IPP) Sultanate of Oman





Stakeholder
Engagement Plan
Internal Only

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# APPENDIX A – EXAMPLE OF GRIEVANCE FORM







# LIST OF ABBREVIATIONS

ABBREVIATION	MEANING	
AIIB	Asian Infrastructure investment Bank	
E&S	Environmental and Social	
ESIA	Environmental and Social Impact Assessment	
EPs	Equator Principles	
EPC	Engineering, Procurement and Construction	
EPFIs	The Equator Principle Financial Institutions	
IFC	International Finance Corporation	
IFI	International Financial Institution	
ILO	International Labour Organisation	
IPP	Independent Power Project	
LTA	Lenders Technical Advisor	
MECA	Ministry of Environment and Climate Affairs	
NOMAC	The First National Operation and Maintenance Company	
OEMP	Operational Environmental Management Plan	
OETC	Oman Electricity Transmission Company	
OPWP	Oman Power and Water Procurement	
O&M	Operation and Maintenance	
MW	Mega Watt	
PAP	Project Affected People	
PPA	Power Purchase Agreement	
PV	Photovoltaic	
SEP	Stakeholder Engagement Plan	
5 Capitals	5 Capitals Environmental and Management Consulting	







# 1 Introduction

As part of Oman's 2040 Strategy and in line with the overall economic diversification plans in the country, the government of the Sultanate of Oman has engaged in a successful programme over the past two decades to restructure and develop the private sector involvement in the electricity and water sectors of Oman in order to expand and improve delivery of electricity and water services in the Sultanate.

In March 2019, the Oman Power & Water Procurement Company (OPWP) awarded the contract to construct a 500MW Solar Photovoltaic Power Plant in the Ad Dhahirah region of Ibri, Oman to a consortium of Saudi Arabia's ACWA Power and Kuwait's Gulf Investment Corporation and Alternative Energy Projects Company. The project award includes the design, engineering, construction, commissioning, ownership, financing, operation and maintenance of the Solar PV Power Plant known as; the Ibri II Solar Independent Power Plant (herein referred to as 'the Project). This solar PV Power Plant will be developed as an Independent Power Project using bi-facial PV module technology and is expected to operate for 15 years according to the Power Purchase Agreement (PPA).

ACWA Power are seeking project finance from the Asian Infrastructure Investment Bank (AIIB) which has established Environmental & Social Standards to evaluate investment risks and set E&S management benchmarks. Other lenders involved in the Project finance may also have separate investment policies, or are understood to be Equator Principles Financial Institutions (EPFIs) that have implementation requirements consistent with the IFC Performance Standards.

In line with the lender requirements, it is necessary to manage and engage with both affected and interested stakeholders for Project purposes. As such, 5 Capitals Environmental and Management Consulting (5 Capitals) has been commissioned by ACWA Power, to prepare this Stakeholder Engagement Plan (SEP), which sets out the strategy and plan in regard to such engagements during the pre-construction, construction and operational phases.

As the SEP will remain relevant throughout the lifetime of the project, 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 upon review.

# 1.1 Scope of the SEP

This document is the Stakeholder Engagement Plan Report (SEP) prepared for the Ibri II IPP Solar PV Project, Sultanate of Oman.







The scope of the SEP is to specify the methods to efficiently manage and facilitate future engagements with stakeholders through various stages of the project lifecycle.

This SEP has been prepared to align with applicable requirements of AIIB Environmental & Social Framework, 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 AIIB's ESF and elements of each ESS, as well as in all of the eight IFC Performance Standards.

## 1.2 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 define processes 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.
- To establish a grievance mechanism that will be implemented for the Project.







# 2 PROJECT OVERVIEW

## 2.1 Project Background and Rationale

The 500MWac Solar PV Project in Ibri, Oman is a continuation of the implementation by the Government of its privatisation policies designed to encourage private sector participation in the provision of utilities in Oman. This comes in line with Oman's vision of restructuring its electricity sector and diversifying its energy resources. This renewable energy project is the largest utility scale Solar PV project in the Sultanate of Oman that will contribute to meeting the energy needs of the people and enhancing the targeted economic diversification.

# 2.2 Project Location

The proposed project will be located in an undeveloped area of approximately 1,327 hectares in the Ad Dhahirah region of Ibri, Oman. The proposed site is located in proximity to Highway 21 (Buraimi-Ibri highway) west of the town of Ibri, approximately 100km south of the Omani coastline and approximately 100km east of the border with the UAE. The site's elevation is approximately 285m above sea level.

Figure 2-1 Proposed Project Location









# **Table 2-1 Project Site Coordinates**

ID	WGS 84 UTM ZONE 40Q		
Iυ	Northing	EASTING	
1	2586239.887	422551.669	
2	2586238.887	420111.465	
3	2582759.820	420111.465	
4	2582759.820	4203044.508	
5	2583471.422	423044.508	
6	2583471.422	423307.248	
7	2584242.374	424180.715	
8	2583913.414	424467.983	
9	2583880.526	424430.321	
10	2583790.145	424509.260	
11	2583869.070	424599.646	
12	2584288.660	424233.229	
13	2584298.083	424243.920	
Α	2586239.887	418694.793	
В	2584413.725	418946.292	
С	2580975.112	420465.641	
D	2581373.927	421074.164	
Е	2582671.520	425615.149	
F	2583685.823	424542.289	
G	2582978.180	423740.551	





## 2.3 Local Receptors and Sensitivities

<u>Note:</u> Full details of receptors, local sensitivities, land users and site baseline are described in the ESIA. A summary of this has been included below for context in this SEP.

Findings from site visits undertaken as part of the ESIA process (in October 2018 & May/June/July 2019) and review of satellite imagery identified few land uses within the Project sit, but did include informal use of the land by Sheikhs for camel rearing, herding and racing. The Sheikhs employ expatriate Southern Asian workers to tend to the camels, with these workers living on the site.

Several receptors have also been identified locally off-site, which include residential, agricultural, recreational and industrial premises and activities. All such receptors are stated below.





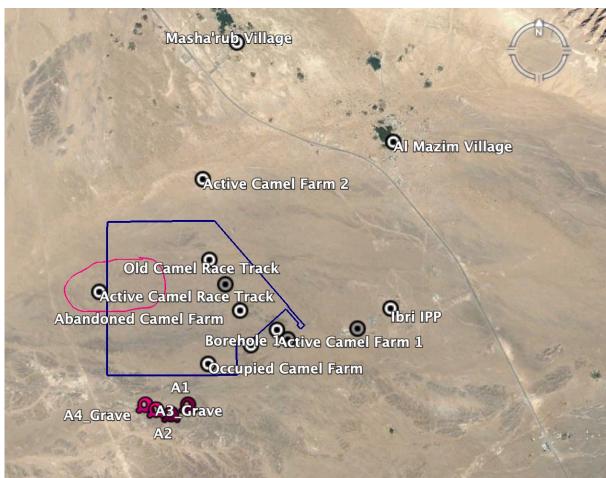
# **Table 2-2 Local Receptors**

LOCATION	RECEPTOR	RECEPTOR TYPE	DISTANCE FROM PROJECT SITE
	Occupied Camel Farm	Commercial	Within the western extent of the Project site although the camel track will be relocated by the EPC Contractor.
Within the Project Site	Accommodation Hut	Residential	Within the eastern extent of the Project site beside the occupied camel farm
	Camel Race Track	Recreational	Partially on the site and other areas are directly adjacent to the western boundary Project site.
	Active Camel Farm 1	Residential/ Commercial	Approximately 500m from the southeastern boundary of the Project site.
	Active Camel Farm 2	Residential/ Commercial	Approximately 600m from the eastern boundary of the Project site.
	Petrol Filling Station	Commercial	Approximately 5 km from the north east boundary of the Project site.
	Highway 21 (Buraimi- Ibri highway)	Infrastructure	Approximately 4 km from the north east boundary of the Project site.
	Ibri IPP – Worker Accommodation Area		Approximately 1800m from the south east of the Project boundary.
External to the Project	Al Ma'mur Village	Residential	Approximately 5.7km from the north east boundary of the Project site.
Site	Al Mazim Village		Approximately 7km from the north east boundary of the Project site.
	Masha'rub village		Approximately 8km from the north east boundary of the Project site.
	Borehole 1	Posouroo	Adjacent to the southern extent Project boundary (off-site)
	Borehole 2	Resource	Approximately 200m from the southern boundary of the Project site.
	Ibri IPP	Industrial	Approximately 2km from the south east of the Project boundary.
	Graves	Archaeological	Approximately 0.5km south west of the Project boundary





Figure 2-2: Receptor Locations



# 2.4 Project Description

The Project will be developed by a consortium of Saudi Arabia's ACWA Power and Kuwait's Gulf Investment Corporation and Alternative Energy Project Company as an Independent Power Project (IPP) utilizing photovoltaic technology to generate electricity. The scope of the Project works will include the development, design, engineering, construction, commissioning, financing, operations and maintenance of the 500MW solar PV Power Plant.

Photovoltaic Power Plants use photovoltaic cells to generate electricity upon exposure to sunlight. This power generation technology converts solar radiation into direct current electricity using semiconductor materials in the form of a panel that exhibits photovoltaic effects. A typical PV Plant mainly comprises of a solar field which consists of a large group of semi-conductor technology-based silicon solar cells arranged in what is known as solar PV Panels or PV Modules. The solar panels convert sunrays (photons) to electrons and the electron flow generates Direct Current electricity (DC) which gets connected and channelled into an electric device 'inverter' to convert the Direct Current (DC) into Alternating Current (AC).





The proposed Project will utilize bifacial type Solar PV Panels that generate energy from both top and rear sides. The PV will comprise of PV cells within modules arranged in arrays upon single axis tracking system/ mounting structures. The PV modules will be designed and arranged to ensure the most efficient alignment for the capture of solar radiation. Mounting structures will be established within shallow foundations set into the underlying soils.

The ground covering in the solar project will comprise of a reflective geotextile layer to increase albedo for bifacial generation. The material shall be of PVC material covering approximately 80% of the site.

The Project will comprise 727849 modules, 3204 inverters and 2 X 220 transformers in order to generate DC capacity of 500MWp. The solar field will occupy approximately 1154.25ha out of 1,327ha of the total project area.

The Plant will connect to the 220kV OETC Substation via two (2) 11kV 1000kVA cable links. This OETC substation will be constructed at the south eastern extent of the Project boundary.





# 3 REGULATIONS AND REQUIREMENTS

### 3.1 National Requirements

The Sultanate has no established the statutory requirements for stakeholder engagement, project public consultation or disclosure mechanism.

### 3.2 Lender Requirements

#### 3.2.1 Asian Infrastructure Investment Bank (AIIB)

The Asian Infrastructure investment Bank (AIIB) have an established 'Environmental & Social Policy' and separate 'Environmental & Social Framework' (ESF) documents that set out the applicable requirements the banks investment projects should fulfill in the potential receipt of finance.

#### Stakeholder Engagement

AllB's ESF sets out a clear vision for stakeholder engagement in paragraph 13:

'13. Stakeholder Engagement. The Bank believes that transparency and meaningful consultation is essential for the design and implementation of a Project and works closely with its Clients to achieve this objective. Meaningful consultation is a process that begins early and is ongoing throughout the Project. It is inclusive, accessible, timely and undertaken in an open manner. It conveys adequate information that is understandable and readily accessible to stakeholders in a culturally appropriate manner and in turn, enables the consideration of stakeholders' views as part of decision-making. Stakeholder engagement is conducted in a manner commensurate with the risks to, and impacts on, those affected by the Project.'

#### **Grievance Mechanism**

**'63. Project-level Grievance Redress**. The Bank requires the Client to establish, in accordance with the ESP and applicable ESSs, a suitable grievance mechanism to receive and facilitate resolution of the concerns or complaints of people who believe they have been adversely affected by the Project's environmental or social impacts, and to inform Project-affected people of its availability...'

ESS 1 includes specific requirements for the grievance mechanism. This includes:

'Establish a suitable grievance redress mechanism to receive and facilitate resolution of the concerns of people who believe they have been adversely affected by the Project's environmental and social impacts and inform Project-affected people of its





availability. Be aware of and respond to stakeholders' concerns related to the Project in a timely manner. Scale the grievance mechanism to the risks and impacts of the Project. The grievance mechanism may utilize existing formal or informal grievance mechanisms, provided that they are properly designed and implemented, and deemed by the Bank to be suitable for the Project; these may be supplemented, as needed, with Project-specific arrangements. Design the mechanism to address Project- affected people's concerns and complaints promptly, using an understandable and transparent process that is gender-sensitive, culturally appropriate and readily accessible to all Project-affected people...'

#### AllB's Project-Affected Peoples' Mechanism

The Project-affected People's Mechanism (PPM) has been established by the AllB to provide an opportunity for an independent and impartial review of submissions from Project-affected people who believe they have been or are likely to be adversely affected by AllB's failure to implement its ESP in situations when their concerns cannot be addressed satisfactorily through Project-level GRMs or AllB Management's processes.

For information on how to make submissions to the PPM, please visit the <u>PPM webpage at:</u> <a href="https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html">https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html</a>.

### 3.2.2 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 will 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 will 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 will 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.

#### 3.2.3 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 will:

- 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 will 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 will 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 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.





# 4 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 (SEP) for the Ibri 2 IPP Project has been prepared to guide stakeholder engagement for the project. The Stakeholders included to 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 applicable elements of AllB's ESF and ESS', as well as good practice benchmarks outlined in the IFC Handbook on Stakeholder Engagement<sup>1</sup> 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.).

<u>Note:</u> Consultation on the Project to date has been undertaken for the ESIA and RAP processes. Details of these consultations are provided in the ESIA and RAP.

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 $<sup>{}^{\</sup>scriptscriptstyle 1}\text{ IFC, 2007, Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.}$ 





# 5 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, NGOs, and government authorities. Stakeholders may also include politicians, companies, labour unions, academics, religious groups, national social and environmental public-sector agencies, and the media.

## 5.1 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.

#### 5.1.1 Impacted Stakeholders

The Impacted stakeholders are individuals or group of people that can be potentially affected by the projects' environmental and social impacts either directly or indirectly. Potential environmental and social impacts of the project have been identified and assessed in the Environmental and Social Impact Assessment (ESIA) and are related to resettlement, terrestrial ecology, soil and groundwater, air quality, noise and vibration, waste and wastewater management, traffic and transportation, archaeology and cultural heritage, landscape and visual impacts, socio-economics, community, health, safety & security, etc. Such impacts can directly relate to stakeholders, including receptors that have been outlined above.

Based on the Project's footprint and area of influence, the Project will involve resettlement of camel herders and a camel race track (based on informal land users), however, there is no land acquisition involved. Such processes are stated in the standalone Resettlement Action Plan (RAP), which also includes specific engagements plans linked to resettlement. The land is state owned and is managed by the Ministry of Housing (MoH), who have already been engaged at the ESIA and RAP stages of the Project.





Identified stakeholders that can potentially be directly impacted by the Project or its environmental and social impacts during construction or operation are listed in the table below.

Table 5-1Identified Potentially Impacted Stakeholders

IMPACTED STAKEHOLDERS	DESCRIPTION	Justification
Local Sheikhs	Tribal heads and prominent local area figures.	Use land at and around the Project site for camel rearing, herding and racing. The Sheikh's also employ the camel herders (below) to tend to their camels.
Camel Herders	2 Expatriate South Asian workers	Project Affected People – Need to be resettled form the site.
Ibri 1 IPP	Neighbouring Industrial Facility	Exposure to potential impacts relating to changes in ambient air quality, noise and vibration, increased traffic(safety) etc. and consideration for potential grievances.

#### 5.1.2 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, NGOs 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 5-2 Identified Interest-Based Stakeholders

STAKEHOLDERS  GROUP	Interest-based Stakeholders	Project interest/Stake holding
Omani Government Agencies	Ministry of Environment and Climate Affairs	The government regulator for environment in Oman. Their mission is to work with partners in Oman to protect the environment, preserve and develop their resources and Invest them efficiently to ensure their sustainability.
	HE The Wali of Ibri	A local government figurehead separate from Ibri Municipality. The Wali adjudicates on community matters and affairs, including land matters.
	Ibri Municipality	The local government at the project location
Local Government	Ministry of Housing	Authority that manages the state-owned land, upon which the Project will be constructed. MoH is the authority involved in functions of urban planning, and the required elements to regulate housing and related development of cities and suburbs.





STAKEHOLDERS GROUP	Interest-based Stakeholders	Project interest/Stake holding
	Members of the Public	
External Parties	International and Local NGO's	Interest in the development of the project. Interest may include potential environmental and social risks
	International & Local Research Institutions	related to the project development and operation
Project Proponent	OPWP	The Project proponent of Ibri II IPP. OPWP is responsible for 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.
Project Lenders	Financial Institutions	Key interest in the project development and project success. Interest includes potential environmental and social risks related to project financing.





# 6 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.

## 6.1 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, Phone calls and email Suitable to engage interest-based stakeholders listed in Section 4.1.2 and to notify them of the engagement and disclosure mechanisms.
- Posters or Notices Signboards and Illustrative posters (info graphics) will be
  placed at the project entrance gate, including direct access to the grievance
  mechanism.
- Bilateral meetings Suitable to engage impacted and interest-based stakeholders as identified, 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 advertised on ACWA Power's website with a contact point provided for comment. The same will be available on AllB's website.

### 6.2 Disclosure of ESIA, RAP & SEP

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

Table 5-1 ESIA Public Disclosure Timetable

ACTIVITY	Stakeholders	Engagement Method	TIMING AND FREQUENCY
Disclosure of ESIA, RAP and SEP	Camel Herders	Bi-lateral (face-to-face) meeting to advise of RAP & ESIA outcomes, compensation entitlements, processes, schedule for resettlement, access to grievance process and on-gong follow up.	Completed October 2019
	Sheikhs, Ibri 1 IPP, Local Government	Meeting with invited stakeholders at the Wali of Ibri's office.	Completed November 2019





	It is possible that the local Sheikhs will not attend and in this instance, the Wali will advise them of the outcomes privately.	
Other interest-based stakeholders	Once approved and acceptable to the lenders, the ESIA, RAP and SEP will be fully disclosed online in English and as a Non-Technical Summary (for ESIA) in both English and Arabic.	Disclosed online at the ACWA Power website since 10 <sup>th</sup> November 2019

## 6.3 Stakeholder Engagement During Construction

Stakeholders most likely to be affected by construction activities will be engaged leading up to and during the physical construction of the Project. 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).

Construction related engagement processes are set out below and will be the responsibility of the EPC Contractor, although support from the Project Company is expected (to provide a local cultural context). Those actions marked with an Asterix (\*) are also stated specifically in the RAP. It is expected that the responsibility for resettlement related engagement lies with the Project Company who will be required to regularly engage with the Wali of Ibri, Sheikhs and camel herders.

Table 6-1 Construction Phase SEP timetable

ACTIVITY	Stakeholders	Engagement Method	TIMING AND FREQUENCY
Confirmation of date of resettlement*	Camel Herders	Advised directly to herders bi-laterally	2 months prior to resettlement
	Sheikhs	Advised to the Wali of Ibri who will liaise with Sheikhs	
Agreement on process and timing of camel racetrack construction*	Sheikhs	Advised to the Wali of Ibri who will liaise with Sheikhs	2 months prior to construction
Notify stakeholders of construction activities and construction timeline	The Ibri 1 IPP	Official letters will be sent to the identified stakeholders to inform them about all construction activities including the construction of associated facilities.	Prior to the start of construction and updated as necessary within the construction phase if there are changes to construction





ACTIVITY	STAKEHOLDERS	Engagement Method	TIMING AND FREQUENCY
		Bilateral meetings will be held where necessary.	activities or processes.
	The Wali of Ibri	Official emails or letters in coordination with local authorities will be sent to provide information on construction activities and timelines	
	Members of the Public International and Local NGO's International and Local Research Institutions	Notification of the project construction activities and timelines on ACWA Power's website.	
Updates on status of construction of herder farm and residence*	Camel Herders	Advised directly to herders bi-laterally	Fortnightly after ID 3 until completion and resettlement
Confirmation of	Camel Herders	Advised directly to herders bi-laterally	Adding of
completion of herder farm and residence*	Sheikhs	Advised to the Wali of Ibri who will liaise with Sheikhs	At time of completion
Updates on status of construction of camel racetrack*	Sheikhs	Advised to the Wali of Ibri who will liaise with Sheikhs	Monthly during construction
Confirmation of completion of camel racetrack*	Sheikhs	Advised to the Wali of Ibri who will liaise with Sheikhs	At time of completion
Communication of emergency preparedness and action plan	Ibri 1 IPP Ibri Municipality Project Lenders	Official emails or letters informing the stakeholders about the emergency response procedures in place and any required co-ordination for specific events.  Bilateral meetings will be held where necessary.	Prior to the start of construction and updated if key changes to the
	The local Sheikhs and camel herders who will operate the relocated camel race track and live in proximity of the Project	Informal meetings with the HSE Manager to inform the stakeholders about the emergency response procedures in coordination with local authorities.	plan occur.
Independent Environmental &	Project Lenders	Environmental and Social auditing to	On a quarterly basis throughout





ACTIVITY	STAKEHOLDERS	Engagement Method	TIMING AND FREQUENCY
Social Monitoring & Reporting		check projects compliance with Omani standards and AIIB & IFC Performance Standards and EHS Guidelines.	construction phase of the project.
On-going follow up for resettlement	Camel Herders	Bi-Lateral	As and when grievances arise and specific proactive follow up quarterly
related issues, grievances etc*	Sheikhs	Via Wali of Ibri who will liaise with Sheikhs	
Implementation of grievance mechanism	All identified stakeholders	As described in the grievance mechanism section of this SEP (Section 7).	Established at the start of construction and updated throughout the construction phase to facilitate rapid and effective response.
Independent Environmental & Social Monitoring & Reporting.	Project Lenders and other interested stakeholders	Environmental and social auditing to check projects compliance with Omani standards and AIIB/IFC Performance Standards and EHS Guidelines.	On a quarterly basis throughout the construction phase of the project. Disclosure of report summary as per 6.5.2 (below).

# 6.4 Stakeholder Engagement During Operation

Stakeholder engagement during the operational phase of the project will be the responsibility of the O&M Company, although it is expected that the Project Company will provide key support in order to ensure local cultural context during engagement activities.

It will be important for the Project Company 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 6-2 Operational Phase SEP Timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Notify stakeholders of the transition from construction to operations	The Ibri 1 IPP	Official letters to provide information about transitioning and commencement of operations. Bilateral meetings will be held where necessary.	
	The Wali of Ibri	Official emails or letters to provide information about transitioning from construction and commencement of operations.	At least 2 months prior to commencement of operations.
	Members of the Public International and Local NGO's International and Local Research Institutions	Notification of the project transition from construction to operational phase and timeline on ACWA Power's website.	
Upon development of and any updates related to the emergency preparedness and action plan, or other HSE related matters that may affect local external parties.	Ibri Municipality Ibri 1 IPP Project Lenders	Official letters and emails informing the stakeholder about the emergency response procedures in place.  Bilateral meetings will be held where necessary.	2 months prior to the commencement of operations and updated if key changes to the plan occur.
	The Local Sheikhs Camel Herders	Informal meetings with the HSE Manager to inform the stakeholders about the emergency response procedures in coordination with local authorities.	
Independent Environmental & Social Monitoring & Reporting.	Project Lenders and other interested stakeholders	Environmental and social auditing to check projects compliance with Omani standards and AIIB/IFC Performance Standards and EHS Guidelines.	On an annual basis throughout operational phase of the project. Disclosure of report summary as per 6.5.2 (below).
On-going follow up for resettlement	Camel Herders	Bi-Lateral	As and when grievances arise and





ACTIVITY	Stakeholders	ENGAGEMENT METHOD	TIMING AND FREQUENCY
related issues, grievances etc*	Sheikhs	Via Wali of Ibri who will liaise with Sheikhs	specific proactive follow up quarterly for first year of operations.
Implementation of grievance mechanism	All identified stakeholders- including project workforce	As described in the grievance mechanism section of this SEP (Section 7).	Established at the start of operations and managed throughout the entirety of the operational phase to facilitate rapid and effective response.

# 6.5 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. As per the programme in this SEP and upon request, 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 potential risks to and potential environmental and social impacts on such communities and relevant mitigation measures;
- The stakeholder engagement process and;
- The grievance mechanism.

#### 6.5.1 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.

AllB have proposed for quarterly independent E&S audits to be undertaken during construction and annual audits during operations. The purpose of these audits will be to satisfy lender requirements for compliance monitoring and reporting.

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 reports will also include evaluation of compliance with the ESIA, SEP & RAP requirements, including the grievance mechanism. The audit reports will be disclosed to the Project Lenders (AIIB and any other lenders involved).





#### 6.5.2 Disclosure of E&S Audits

It has been agreed between ACWA Power, the lenders and the Lenders Technical Advisor (LTA) that 'a one-pager on the findings of the external environmental and social quarter audits that will be performed by the LTA during the construction and once a year during the operation through the AllB website. Two printed copies of those summary audit reports will be made available at the EPC Contrator's Offices at the project site (for the construction phase E&S Audits)'

# 7 GRIEVANCE MECHANISM

The Projects activities (during construction and operation) may result in potential nuisances for stakeholders, or environmental and social impacts and as such it is required to establish a grievance mechanism to address potential complaints from affected parties. 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 grievance mechanism is an important part of stakeholder engagement and will be in place from the ESIA, SEP & RAP disclosure process, throughout construction and operations through the end of the project life. 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.

The overall responsibility and accountability for the grievance mechanism will be held by the Project Company. However, implementation may be delegated and fall under separate parties depending whether the grievance is related to the construction or the operational phases, i.e. EPC Contractor during construction and O&M Company during operations. In line with the RAP it is considered appropriate that resettlement related grievances are managed by the Project Company.

# 7.1 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.

## 7.2 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 & RAP 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 will 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 will be referred to the justice system;
- Commercial disputes: Commercial matters will be stipulated for in contractual agreements and issues will be resolved through a variety of commercial resolution mechanisms or civil courts.

# 7.3 Steps in Managing Grievance Mechanism

### 7.3.1 Publicising Grievance Management Procedures.

The grievance mechanism of this project will be publicised using the means outlined and as linked to the disclosure of the ESIA, RAP and SEP processes. This has already included disclosure to camel herders and stakeholders in attendance at the Project E&S disclosure meeting in November 2019. In addition, notices will also be provided at the project entrance in regard of how to lodge a grievance and the process related to follow up. 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.

In addition, an indication that AIIB's Project-Affected People's Mechanism (PPM) is available to Project stakeholders will be communicated to all relevant stakeholders, and displayed at site concurrently with the communication on the Project-level GRM. See Section 3.2.1 for an overview of AIIB's PPM.

### 7.3.2 Submitting a Grievance

<u>Note:</u> Specific measures related to grievances for the resettlement of PAPs are stated in the RAP and involve defined processes due to PAP vulnerability for camel herders and in relation to engagement with local Sheikhs via the Wali of Ibri (to maintain culturally sensitive means of communication). These methods slightly differ from those stated herein for the resettlement process and should be referred to specifically in the RAP.

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

- Direct delivery to a sealed grievance box at the project site entrance;
- Submission by post or email;
- Directly received by project personnel, including security personnel (security personnel at the project's gate must be aware and trained to deal with any grievances appropriately); and
- Via a log-book at the office of HE the Wali of Ibri.

Information will be provided at the project entrance, at the location of grievance boxes and at the office of HE the Wali of Ibri to inform people about the process and timeline to follow up their grievances.

For illiterate complainants or those that prefer to submit their grievances verbally, they will have the possibility to meet with the relevant site E&S/HSE Manager (or Secretary of HE the Wali of Ibri) who will take notes on the details of the complainant and read them out loud to the compliant to confirm that the key elements of the complaint have been captured.

If an anonymous grievance (e.g. letter or email without details about the complainant) or the grievant requests to remain anonymous is submitted, the grievance will also be accepted and processed.





### 7.3.3 Keeping Track of Grievances

Upon receiving grievances submitted by any means mentioned above (including those linked to resettlement as stated in the RAP), the rules below will be followed to ensure all grievances are adequately investigated in order to avoid leaving any issues or concerns raised opened.

- The grievance will be recorded in a form of register. The register will contain:
  - Details of the grievance;
  - The personnel/division(s) responsible for resolving the grievance; and
  - Process tracking fields (receipt dates, status, result dates).
- The grievances will be acknowledged as soon as possible (<u>no later than a week from reception</u>) by sending a formal confirmation with a complaint number and a timeline for response to the compliant to assure the complainant that the organization is responding properly.
- In cases of sensitive grievances, such as those involving multiple interests and a
  large number of affected people, where a more complex investigation is
  required, the complainant will receive an update within two weeks of the
  grievance being received, explaining the actions required to resolve the
  complaint, and the likely timeframe;
- The Project Company will explain in the first letter of acknowledgment, which claims are clearly outside the scope of the mechanism and what alternative mechanisms communities can use to address these potential issues.

### 7.3.4 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 responsible and accountable party remains the Project Company, although the investigation and review may be delegated to the EPC Contractor or O&M Company respectively. The grievance mechanism must 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.

All grievances will be investigated by the responsible Project party within 2 weeks of submittal. Where grievances require a longer duration for investigation, the grievant will be informed of this delay and advised of the expected timeline for a response.





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.

### 7.3.5 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 dust, or access road noise), providing an apology and revising the stakeholder engagement strategy.

The solution to the grievance will be communicated to the grievant either in written format or verbally depending on what format the grievant has selected as preferred, but in all cases a written record will be kept by the Company. 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 eligibility review 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 reach 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.

Where the grievant is not satisfied with the outcome of the proposed resolution, actions concerning further discussion and re-assessment shall be completed and advised within 2-weeks of notification of dissatisfaction by the grievant.





### 7.4 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.

Although the Project Company will remain responsible and accountable, 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. They will also be required to train related staff (as outlined below). 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.

## 7.5 Internal Parties/Worker Grievance Mechanism

#### 7.5.1 Construction Phase

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.

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.

### 7.5.2 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 at the site entrance gate. Sealed and locked 'post boxes' will be made available at the project site entrance for grievance form submission. The process for recording, reviewing, following up and responding to will be the same as detailed above. 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 notice board at the site's main entrance gate, once the individual has been appointed.





### 7.6 Process Flow and Timeline

#### Table 7-1 Grievance Process and Timeline

Stage	TIMELINE	
Grievance Received/Submitted	-	
Grievance logged and acknowledged	Within 1 week of grievance being submitted	
Grievance investigated	Within 2 weeks of grievance being submitted*	
Proposed resolution conveyed to grievant	Within 2 weeks of grievance being submitted	
If applicable following dissatisfaction of resolution by Grievant		
Actions to re-assess grievance/propose new solution/inform Grievant of final decision	Within 2 weeks of notification of dissatisfaction by Grievant	

<sup>\*</sup> Where complex grievances, or other factors are extending the investigation time, the Grievant will be informed of this delay and advised of an updated expected timeline for response.

## 7.7 Training

- It will be the responsible of project management to endorse the grievance mechanism and ensure that they are aware of the availability of this process. It is also necessary for project management to ensure that personnel are allocated to manage the grievance mechanism.
- These personnel shall be made fully aware of the outlined grievance mechanism and have access to this document to ensure that they can undertake the necessary duties for effective implementation.
- As grievances can be submitted/taken at the Project entrance, it will be
  necessary to ensure that security staff are trained in regard to this process and
  have access to this document and any applicable forms, contact details of
  responsible project parties etc.
- As grievances can be taken at the office of HE the Wali of Ibri, it will be necessary
  to train the Secretary to provide grievance forms, or otherwise log incoming
  grievances in regard to the Project. The secretary must have access to this
  document (and provided with a copy of any future updates).





# 8 MONITORING AND REPORTING

# 8.1 Independent Periodic Monitoring/E&S Audits

AllB ESF Policy (Item K) and Equator Principles 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 consultant who has experience in working with the requirements of lenders. 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.

# 8.2 Reporting

#### 8.2.1 Disclosure of E&S Audits

It has been agreed between ACWA Power, the lenders and the Lenders Technical Advisor (LTA) that 'a one-pager on the findings of the external environmental and social quarter audits that will be performed by the LTA during the construction and once a year during the operation through the AllB website. Two printed copies of those summary audit reports will be made available at the EPC Contrator's Offices at the project site (for the construction phase E&S Audits)'

#### 8.2.2 Other

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;

# 9 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.

## 9.1 Roles and Responsibilities

The responsibilities of the HSE Manager, Environmental and Social Manager and Community Liaison Officer are to be outlined below once confirmed by the EPC Contractor and O&M Company respectively.

### 9.1.1 HSE Manager

Name	
Contact Details	

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.

#### 9.1.2 Environmental and Social Manager

Name	
Contact Details	





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 nontechnical summary of the audit reports and of the full reports if required.

### 9.1.3 Community Liaison Officer

Name	
Contact Details	

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 complainants 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.

# 10 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

GRIEVANCE FORM		
To be used for grievance(s) only. S	hall not be used to raise comments, suggestions, or/and inquires or any other matters	
INSTRUCTIONS	Please fill in this Grievance form in clear handwriting and submit through one of the following means:  - Directly to Environmental & Social Manager  - By email to:  - Deposit in the letter box at the Project main entrance	
	First Name:	
Full Name	Last Name: <ul> <li>I wish to raise my grievance anonymously (You can remain anonymous if you prefer but we will not be able to contact you with a response to your concern)</li> </ul>	
Contact Information Please mark how you wish to be contacted	□ By Post: Please provide mailing address:	
(mail, telephone, e-	☐ By telephone:	
mail).	□ By email:	
Preferred Language of	☐ English	
Communication	☐ Arabic	
	What happened? Where did it happen? Who did it happen	
Description of Incident/Grievance	to? What is the result of the problem?	
	☐ One-time incident/grievance (date)	
Date of Incident/Grievance	☐ Happened more than once (how many times?)	
	☐ On-going (currently experiencing problem)	
What would you like to see happen to resolve the problem?		
Signature:		
Date:		