



# FEWA 150 MIGD SWRO Independent Water Project

## Umm Al Quwain, UAE



Stakeholder Engagement Plan

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## LIST OF ABBREVIATIONS

Abbreviation	Meaning
EHS	Environmental Health & Safety
EPC	Engineering, Procurement and Construction
EPFIs	The Equator Principle Financial Institutions
EPs	Equator Principles
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental & Social Management System
FEWA	Federal Electricity and Water Authority
IFC	International Finance Corporation
IFIs	International Financial Institutions
MIGD	Million Imperial Gallons per Day
O&M	Operation and Maintenance
PHED	Public Health and Environment Department
RAK	Ras Al Khaimah
SEP	Stakeholder Engagement Plan
SWRO	Sea Water Reverse Osmosis
UAE	United Arab Emirates
UAQ	Umm Al Quwain
5 Capitals	5 Capitals Environmental and Management Consulting

# 1 INTRODUCTION

To meet the future potable water demand of the Emirate of Umm Al Quwain, the Federal Electricity and Water Authority (FEWA) is proposing to sponsor the development of a Sea Water Reverse Osmosis (SWRO) desalination plant neat Marjan Island, south of the border with the Emirate of Ras Al Khaimah. The proposed project, originally planned as Phase 1 (45 MIGD, 2018) has been increased this year to a capacity of 150 MIGD (including Phases 1 and 2) and will be owned and operated by a Consortium including ACWA Power, Mubadala and FEWA.

The project developers 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 IFIs; 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, it will act as a plan within the projects 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 Project will be located in the northern most extent of the Emirate of Umm Al Quwain in the United Arab Emirates. The specific plot of land has been allocated by FEWA and is immediately south of the Umm Al Quwain border with the Emirate of Ras Al Khaimah, approximately 20 km north of the city of Umm Al Quwain.

The Project will primarily be located on land with intake and outfall facilities extending into the marine environment. The land-based section of the project will be approximately 23.5 hectares in area in two plots of land adjacent to E11 carriageways. The smaller project site (Project site 1) which is located between the north and south flowing E11 carriageways will be approximately 6.9 hectares whereas the larger project site (project site 2) which is located east of the north flowing E11 carriageway will be approximately 16.6 hectares.

**Figure 1-1 Location of the Proposed Project**



## 1.2 Land Ownership

The land ownership for the proposed project site will be governed by a Land Lease Agreement (LLA) which will set the terms of use and enjoyment of the site. The land ownership has been transferred by the Emir of Umm Al Quwain to FEWA which allows FEWA to grant lease over the site to the Project Company. The LLA will initially be set at 28 years covering the 25 years Water Purchase Agreement (WPA) after which the Project Company will be required to return the site to FEWA at the end of this term.

## 1.3 Local Facilities and Receptors

Satellite imagery and site visits undertaken at the project site and laydown area identified commercial, residential and industrial receptors external to the SWRO project within a 5 km radius to the project site as shown in the table and figure below.

**Table 1-1 Potential Local Receptors**

RECEPTOR	RECEPTOR TYPE	DISTANCE FROM THE PROJECT SITE
Waldorf Astoria Ras Al Khaimah (RAK)	Commercial	Approximately 4 km north east of the project site 1
Al Hamra Village Townhouses (RAK)	Residential	Approximately 3.9 km north east of the project site 1

RECEPTOR	RECEPTOR TYPE	DISTANCE FROM THE PROJECT SITE
Smartline Bin Majid Beach Resort (RAK)	Commercial	Approximately 1.6 km north west of the project site 2
Ras Al Khaimah Industrial Zone (RAK)	Industrial	Approximately 1.2 km north east of the project site 2
Park Inn by Radisson Resort Ras Al Khaimah (RAK)	Commercial	Approximately 2.5 km north of the project site 1
Rakystay Marjan Island (RAK)	Commercial	Approximately 2.8 north west of the project site 1
Pacific Development (RAK)	Commercial	Approximately 3.6 km north west of the project site 1
DIC Hotel Resort Project (RAK)	Commercial	Approximately 4km north west of the project site 1
Double Tree by Hilton Resort and SPA (RAK)	Commercial	Approximately 1.4 km north west of the project site 1
Ras Al Khaimah Convention Centre (RAK)	Commercial	Approximately 1.4 km north west of the project site 1
Brasserie (RAK)	Commercial	Approximately 1.2 km north west of the project site 1
Ras Al Khaimah Tourism Development Authority (RAK)	Commercial	Approximately 431 m north of the project site 1
Rixos Bab Al Bahr Resort (RAK)	Commercial	Approximately 475.9 m north west of the project site 1
Wastewater Treatment Plant (RAK)	Industrial	Approximately 106.3 m north east of the project site 1
Al Sinniyah Island (north) (UAQ)	Commercial/Recreational	Approximately 2.4 km south west of laydown area 1
Commercial Compounds 1 (UAQ)	Commercial	Approximately 1.2 km south west of laydown area 1.
Commercial Compound 2 (RAK)	Commercial	Approximately 474 m north east of the project site 2
Commercial Compound 3 (UAQ)	Commercial	Approximately 3.5 km south west of laydown area 1
Commercial Compounds 4 (RAK)	Commercial	Approximately 2.4 km south east of laydown area 1
Residential Compounds 1 (UAQ)	Residential	Approximately 2 km south east of laydown area 1
Residential Compound 2 (RAK)	Residential	Approximately 2.1 km north west of the project site 2
Residential Compound 3 (UAQ)	Residential	Approximately 3.4 km south west of laydown area 1
Residential Compound 4 (UAQ)	Residential	Approximately 779 m south east of laydown area 2
Residential Compound 5 (UAQ)	Residential	Approximately 5 km south west of the laydown area 1
Residential Compound 6 (UAQ)	Residential	Approximately 3.9 km south west of laydown area 1

RECEPTOR	RECEPTOR TYPE	DISTANCE FROM THE PROJECT SITE
Residential Compound 7 (UAQ)	Residential	Approximately 2.7 km south east of laydown area 2
Rocky Intertidal Habitat (UAQ)	Ecological	Approximately 45 m west of the project site 1
Camel Holding Area (UAQ)	Agricultural	Approximately 128 m south of laydown area 2
Construction & Demolition Waste Plant / Waste water Treatment Plant (UAQ)	Industrial	Approximately 3.3 km east of laydown area 2

**Figure 1-2 Potential Local Receptors Within 5km Radius of the Project Site**



## 1.4 Project Overview

### 1.4.1 Project Rationale

The UAE is considered as one of the most water stressed countries in the world. Due to its geographical location, the UAE has very few sources of natural fresh water, with little rain, no rivers and limited amount of groundwater. As a result, the natural water resources cannot meet the increasing demand for fresh water. This increasing demand is influenced by the population growth and expansion of industrial and residential infrastructure.

As a result, the UAE government is investing in infrastructure and water efficient technology in order to meet current and future water needs. The proposed SWRO is therefore necessary to provide a reliable clean water supply to Umm Al Quwain and other Northern Emirates in the UAE. In addition, it is in line with the National Agenda and the UAE 2021 Vision to enhance water capacity in order to meet the shortfall and ease the pressure on the exploitation of groundwater resources.

### 1.4.2 Project Background and Context

On 13<sup>th</sup> June 2018, FEWA confirmed the appointment of a Consortium led by ACWA Power as the preferred bidder for the 45 MIGD SWRO IWP Desalination project. The project was an Independent Water Project (IWP) and was expected to be commercially operational in the 2<sup>nd</sup> quarter of 2020. The proposed Project Company shareholdings were as follows - ACWA Power to hold forty percent (40%) shares in the project equity while Mubadala Investment Company PJSC and FEWA will own forty percent (40%) and twenty percent (20%) of the shares respectively.

The initial scope of works as per the 2018 bid (Tender 39EW/2016) included the installation of the plant along with the associated intake and outfall facilities to produce 45 MIGD (204,500 m<sup>3</sup>/day) of desalinated water. However, in March 2019 under the UAE Ministerial Council for Development Decree No. 34M/10T/2018, FEWA invited ACWA Power & Mubadala under Tender 39E/2016 to submit a proposal for the best technical and commercial discounted proposal to upgrade the IWP 45 MIGD to 150 MIGD (681,900 m<sup>3</sup>/day) SWRO desalination plant. After the submission of the proposal by ACWA Power and Mubadala and its review by FEWA, the revised Project Agreement was signed on 30<sup>th</sup> May 2019.

As a result, 5 Capitals arranged a meeting with PHED on 13<sup>th</sup> June 2019 to discuss the change in the capacity of the project and determine whether PHED would require 5 Capitals to update the existing 45 MIGD Environmental Scoping Report (submitted to PHED on 14<sup>th</sup> August 2018 and approved on 10<sup>th</sup> October 2019) or whether PHED had new conditions for the ESIA. PHED advised 5 Capitals that a new Environmental Scoping Report would not be required and the

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only condition for preparing the project EISIA was to provide a discussion on why the project capacity was increased from 45 MIGD to 150 MIGD.

Additional meetings were also held with the Umm Al Quwain Department of Planning and Survey in November 2018, June and July 2019 to discuss the location of the project sites 1 & 2 in relation to the boundary between the Emirates of Umm Al Quwain (UAQ) and Ras Al Khaimah (RAK). After the review of the project boundaries and site Affection Plan, the Planning Department advised that the northern boundary of the project site must be moved 14m south of the UAQ boundary in order to adhere to the required 30m buffer zone between the two Emirates. This was facilitated by the issuance of new Affection Plans for sites 1 & 2 with revised coordinates reflecting a 30m buffer zone between the project boundary and the UAQ & RAK boundaries.

#### 1.4.3 Project Description

The proposed project will utilise Seawater Reverse Osmosis (SWRO) technology to produce up to 150 MIGD potable water, equivalent to 681,900 m<sup>3</sup>/day. The principal project components include a 600m seawater open channel intake, a 3.6 km piped outfall, RO plant and potable water storage tanks.

The facility will have a seawater intake and pumping system which will include screening and 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 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.

#### 1.5 Scope of the SEP

This document is the Stakeholder Engagement Plan (SEP) prepared for the FEWA 150 MIGD SWRO Independent Water Project. It describes the proposed engagement processes to be undertaken during the construction and operational phases of the project.

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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.

The SEP has been prepared to align with requirements of Equator Principles 5 and Equator Principles 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.

## 1.6 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

Neither the UAE nor the Public Health and Environmental Department (PHED) of UAQ Municipality has established the statutory requirements for stakeholder engagement, project public consultation or disclosure mechanism.

### 2.2 Lender Requirements

It is understood that the Project Developer 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 26<sup>th</sup> 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;

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- 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.

#### **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:

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"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 disclose 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:

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- 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:

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- 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.

### 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 (SEP) for the FEWA 150 MIGD SWRO Independent Water 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 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, 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.

### 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 can 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 marine environment, terrestrial ecology, soil and groundwater, air quality, noise and vibrations, waste and wastewater management, traffic and transportation, archaeology and cultural heritage, landscape and visual impacts, socio-economics, community, health, safety & security, etc.

The projects geographic area of influence originally identified in the Environmental Scoping Study (ESS) 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 the 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
Ministry of Interior (MOI)	Ministry in charge of ensuring peace and security in the UAE	MOI is responsible for the fibre optic cable belonging to the army located on the side of E11 between project site 1 & 2.
Ministry of Infrastructure Development (MOID)	Ministry in charge of federal infrastructure projects (public facilities & utilities) and supervision of their implementation in accordance with best international practices in coordination with concerned authorities.	The EPC Contractor will be required to obtain a NOC from MOID before any tunnelling/drilling is conducted under E11.
Road Transport Authority (RTA)	Government roads & transportation authority with interest in the development of project components that will have an impact on E11 highway	The project will have an impact on the E11 due to tunnelling/drilling for the intake & outfall pipelines.
Du	A telecommunication company in the UAE	Du has fibre optic cables running parallel to the E11 west of the project site 1.
Al Jazirah Aviation Club (RAK)	Private air field located approximately 2.1km from the project site	Paragliders and light air crafts from the Al Jazirah Aviation Club fly over the project site.
Camel Holding Area Owners (UAQ)	A camel holding area located approximately 128 m south of laydown area 2	During site visits, camels from the camel holding area have been observed grazing near the laydown area 2.
Wastewater Treatment Plant (RAK)	An industrial wastewater treatment plant located approximately 106.3 m north east of the project site 1	Exposure to potential impacts relating to changes in ambient air quality, noise and vibration, increased traffic(safety) etc. and consideration for potential grievances.
Ras Al Khaimah Tourism Development Authority (RAK)	Located approximately 440 m north of the project site).	
Rixos Bab Al Bahr Resort (RAK)	Commercial resort located approximately 475.9 m north west of the project site 1	
Commercial Compound 2 (RAK)	Commercial compound located approximately 474m north east of the project site 2	

#### 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, 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 4-2 Identified Interest-Based Stakeholders**

STAKEHOLDERS GROUP	INTEREST-BASED STAKEHOLDERS	PROJECT INTEREST/STAKE HOLDING
Federal Government Agencies	UAE Ministry of Climate Change & Environment	Mission is to work with Partners in the UAE to Protect the Environment, Preserve and Develop their Resources and Invest 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.
	Ministry of Infrastructure Development (MOID)	Ministry in charge of federal infrastructure projects (public facilities & utilities) and supervision of their implementation in accordance with best international practices in coordination with concerned authorities.
	Federal Electricity & Water Authority (FEWA)	Project Proponent with interest in the development of the project
Local Government Agencies	UAQ Municipality	The local government at the project location
	Ras Al Khaimah (RAK) Municipality	The project boundary is found near the border of UAQ and RAK
	Umm Al Quwain Public Health and Environmental Department (PHED)	PHED governs all matters directly relating to the environment in Umm Al Quwain and is the key environmental regulator in the Emirates of UAQ
	Umm Al Quwain Department of Urban Planning and Survey	Authority involved in functions of urban planning, and the required elements to regulate housing and related development of cities and suburbs.
	UAQ Coast Guard	Interest in the development of the project (i.e. intake and outfall)
External Parties	RAK Coast Guard	Interest in the development of the project. Interest may include potential environmental
	Members of the Public	
	International and Local NGO's	

STAKEHOLDERS GROUP	INTEREST-BASED STAKEHOLDERS	PROJECT INTEREST/STAKE HOLDING
	International & Local Research Institutions	and social risks related to the project development and operation.
Project Lenders	Financial Institutions	Key interest in the project development and project success. Interest includes potential environmental and social risks related to project financing.

## 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.
- Posters or Notices - Signboards and illustrative posters (info graphics) will be placed at the project entrance gate.
- Bilateral meetings- Suitable to engage impacted and interest based stakeholders listed in Sections 4.1.1 & 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 advertised 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 PHED 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 & interest based).	Once approved and acceptable to the lenders, the ESIA 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 on ACWA Power's website 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 FEWA 150 MIGD SWRO Project for the past one year (reference the table below for the list of stakeholders identified and consulted). The methods used for the on-going stakeholder engagement process include bilateral meetings, emails, telephone calls and letters. Without high level organisation, open public consultations and public meetings are not allowed in the UAE, although for this project there has been in-depth bi-lateral consultations with government entities to ensure that any project concerns are addressed within the project design and in the ESIA.

**Table 5-1 List of Stakeholder Identified and Consulted**

NAME	REASON FOR INCLUSION	YES/NO	DATES OF MEETINGS/LETTERS
UAE Ministry of Climate Change & Environment	Mission is to work with Partners to Protect the Environment, Preserve and Develop their Resources and Invest them Efficiently to Ensure their Sustainability.	Yes	Project approval would have been obtained from the consultation within UAE government ministries as part of strategic planning process.
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	
Ministry of Infrastructure Development (MOID)	Ministry in charge of federal infrastructure projects (public facilities & utilities) and supervision of their implementation in accordance with best international practices in coordination with concerned authorities.	Ongoing	The EPC Contractor will obtain a NOC from MOID before any tunnelling/drilling is conducted under E11
Federal Electricity & Water Authority (FEWA)	Authority charged to cater for the needs of electricity and potable water for the population of the Northern Emirates. FEWA is also the Project Proponent	Yes	Multiple times during the bid and post bid stage
Umm Al Quwain Public Health and Environmental Department (PHED)	PHED governs all matters directly relating to the environment in Umm Al Quwain	Yes	Multiple meetings have been held between PHED and 5 Capitals post bid in 2018 & 2019 to discuss the scope of the project and ESIA requirements.
Umm Al Quwain Department of	Authority involved in functions of urban planning.	Yes	Multiple meetings have been held between UAQ

Urban Planning and Survey	and the required elements to regulate housing and related development of cities and suburbs.		Department of Urban Planning and Survey, ACWA Power and 5 Capitals in 2018 & 2019 regarding the project boundary in relation to Umm Al Quwain and Ras Al Khaimah Emirates boundaries.
Ras Al Khaimah Municipality	Plays an important role in driving and supporting the project	Yes	An official consultation letter was sent to the Planning and Survey Department on 18 <sup>th</sup> June 2019 requesting them to submit comments or feedback including any available data relevant to the project ESIA.
Ras Al Khaimah Tourist Development Authority	Interest in the development of the project (they are located approximately 440 m north of the project site).	Yes	Consultation letters were sent to these authorities on 18 <sup>th</sup> June 2019 requesting them to submit any comments or feedback including data relevant to the proposed project (See Appendix B for the consultation letters)
Road Transport Authority (RTA)	Government roads & transportation authority with interest in the development of project components that will have an impact on E11 highway.	Yes	
Umm Al Quwain Coastguard	Interest in the development of the project (i.e. intake and outfall)	Yes	5 Capitals has engaged the coastguards several times during the application of marine survey permits

## 5.4 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 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 5-2 Construction Phase SEP timetable**

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Notify stakeholders of construction activities and	Ministry of Infrastructure Development (MOID) Ministry of Interior (MOI)	Official letters will be sent to the identified stakeholders to inform them about all construction activities	Prior to the start of construction and updated as necessary within the construction

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
construction timeline	Ras Al Khaimah (RAK) Municipality RAK Tourism Development Authority RAK Coast Guard & UAQ Coast Guard Umm Al Quwain Department of Urban Planning RTA Du	including the construction of associated facilities. Bilateral meetings will be held where necessary.	phase if there are changes to construction activities or processes.
	Al Jazirah Aviation Club (RAK) Camel Holding Area Owners (UAQ) Rixos Bab Al Bahr Resort (RAK) Commercial Compound 2 (RAK) Wastewater Treatment Plant (RAK)	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.	
Communication of emergency preparedness and action plan	UAQ 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 plan occur.
	Wastewater Treatment Plant (RAK) Camel Holding Area Owners (UAQ)	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	Environmental and Social auditing to check projects compliance with UAE standards and IFC Performance	On a quarterly basis throughout construction phase of the project.

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
		Standards and EHS Guidelines.	
Implementation of grievance mechanism	All identified stakeholders– 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 understanding 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 5-3 Operational Phase SEP Timetable**

Activity	Stakeholders	Engagement Method	Timing and Frequency
Notify stakeholders of the transition from construction to operations	Ministry of Infrastructure Development (MOID) UAQ Municipality Ras Al Khaimah (RAK) Municipality RAK Coast Guard, UAQ Coast Guard & RAK RAK Tourism Development Authority RTA	Official letters to provide information about transitioning and commencement of operations. Bilateral meetings will be held where necessary.	At least 2 months prior to commencement of operations.
	Al Jazirah Aviation Club (RAK) Camel Holding Area Owners (UAQ) Rixos Bab Al Bahr Resort (RAK) Commercial Compound 2 (RAK) Wastewater Treatment Plant (RAK)	Official emails or letters to provide information about transitioning from construction and commencement of operations.	
	Members of the Public	Notification of the project transition from	

Activity	Stakeholders	Engagement Method	Timing and Frequency
	International and Local NGO's International and Local Research Institutions	construction to operational phase and timeline on ACWA Power's website.	
Communication of emergency preparedness and action plan	UAQ Municipality 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.
	Wastewater Treatment Plant (RAK) Camel Holding Area Owners (UAQ)	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	Environmental and social auditing to check projects compliance with UAE standards and IFC Performance Standards and EHS Guidelines.	On an annual basis throughout operational phase of the project.
Implementation of grievance mechanism	All identified stakeholders- including project workforce	As described in the grievance mechanism section of this SEP (Section 6).	Established at the start of operations and managed throughout the entirety of the operational phase to facilitate rapid and effective response.

## 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. 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;

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- 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. The purpose of these audits will be to satisfy lender requirements or monitoring and reporting in accordance with the Equator Principles.

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 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).

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

## 6 GRIEVANCE MECHANISM

The project's 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 will 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 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.

## 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, and will also include notices at the project entrance. 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:

- Direct delivery to a sealed grievance box at the project site entrance;

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- Submission by post or email; and
- 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).

Information will be provided at the project entrance or on the grievance box to let people know when they can expect to be contacted by company personnel and/or receive a response to their complaint.

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 Manager 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.

### 6.3.3 Keeping Track of Grievance

Upon receiving grievance submitted by any means mentioned in section 6.3.2, 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 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 (no later than a week from reception) 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 (see Section 6.2).

### 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).

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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.

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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

External grievance forms will be made available in Arabic and English at the project site main entrance gate. Sealed and locked post boxes will also be made available at the site entrance gate for submission of completed grievance forms. As some of the external parties may not be situated within the proximity of the projects' site, grievance forms will be made available on the website of the project. Contact details of the grievance control representative or E&S manager will be posted at the notice board at the project site entrance gate and advertised on the website.

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

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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 at the site entrance gate and also on the projects website. 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 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 notice board at the site's main entrance gate, 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 to be outlined below.

#### 8.1.1 HSE Manager

Name	To be confirmed
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.

#### 8.1.2 Environmental and Social Manager

Name	To be confirmed
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 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 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.

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## 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 projects 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>	
<p style="color: #0070C0;">To be used for grievance(s) only. Shall not be used to raise comments, suggestions, or/and inquiries or any other matters</p>	
INSTRUCTIONS	<p>Please fill in this Grievance form in clear handwriting and submit through one of the following means:</p> <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:
	<input type="checkbox"/> 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)
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address:
	<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	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
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:	