

Appendix 7: Stakeholder Engagement Plan

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**CHINA ENERGY ENGINEERING GROUP
GUANGDONG POWER ENGINEERING CO.,LTD**

Rabigh Solar PV Independent Power Plant - 300MW

DOCUMENT NO.

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Stakeholder Engagement Plan

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Report Summary

This document represents the Stakeholder Engagement Plan (SEP) for Rabigh Solar PV Independent Power Plant. The SEP describes the key stakeholders and information / communication plans required for the Project. It takes into consideration international standards including IFC Performance Standards and the Equator Principles. The aim of the Plan is to ensure that adequate and timely information is provided to Project-affected people and other stakeholders with opportunities given for people to raise any opinions or concerns they may have on the Project.

The SEP is a live document and will be reviewed and updated periodically throughout pre- construction, construction and operation of the Project.

Glossary

Abbreviation or Term	Definition
Competent person	Someone who has sufficient training and experience or knowledge and other qualities that allow them to assist you properly.
CHSP	Community Health and Safety Plan
CLO	Community Liaison Officer
Developer	The Renewable Energy Project Development Office REPDO
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
EHS	Environmental Health and Safety
ESMP	Environmental and Social Management Plan
EP	Equator Principles
IFC	International Finance Corporation
NGO	Non-Governmental Organisations
SEP	Stakeholder Engagement Plan
PIF	Public Investment Fund
PS	Performance Standards
PV	Photovoltaic

1 Introduction

This document is a Stakeholder Engagement Plan (SEP) in regard to Rabigh Solar Energy Park within the Kingdom of Saudi Arabia (KSA).

The SEP considers best international practice in relation to information disclosure and outlines the general engagement principles that the Developer will adopt in relation to the Project.

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goals are to ensure that adequate and timely information is provided to Project-affected people and other stakeholders, that these groups are given sufficient opportunity to voice their opinions and concerns, and that these concerns influence Project decisions.

The SEP is a “live document” and will be reviewed and updated as the Environmental and Social Impact Assessment (ESIA) progresses and Project planning evolves. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during project implementation and updated as necessary. The SEP should be read in conjunction with the ESIA prepared for this project.

The methods, procedures, policies and actions undertaken by REPDO to inform stakeholders, in a timely manner, of the potential impacts of the Project are the key subject of this document.

A level of stakeholder engagement has already taken place as part of the requirements of the ESIA of the Project. Communication will continue as further planning and design activities are progressed and through project implementation.

Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact the Developer and ask to be included in future communications/engagement opportunities. Furthermore, this document describes the way that any concerns or grievances will be handled by the Developer.

This document also provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

This document contains the following sections:

- Chapter 2 – Project description.
- Chapter 3 – Roles and responsibilities.

- Chapter 4 – Regulations and requirements.
- Chapter 5 – Identification of stakeholders.
- Chapter 6 – Public consultation and disclosure undertaken to date.
- Chapter 7 – Future stakeholder engagement.
- Chapter 8 – Monitoring and reporting.
- Chapter 9 – Grievance mechanism

2 Project Description

The Project covers a total area of approximately 5.3 square kilometre (km²), and it is located 25 km to the south of Rabigh and 145 km north of the city of Jeddah in the Makkah Province in the Kingdom of Saudi Arabia. The project site is bounded by Highway 5 to the west and Saudi Arabia Railway (SAR) Line to the east, as illustrated in Figure 1- 1. Once operational, the proposed Project is designed to have a maximum capacity of approximately 300 MWp of Direct Current (DC), from solar energy.

The photovoltaic (PV) effect is the creation of a voltage (or a corresponding electric current) in a material upon exposure to light. Solar energy facilities use PV effect to convert solar energy to a useful form such as electricity. A PV system consists of cells containing the photovoltaic material, mechanical and electrical connections, mountings and means of regulating and/or modifying the electrical output. Several solar cells are combined into PV modules (solar panels), which are, in turn, connected into an array.

The generated electricity will then be fed into the electricity grid (grid-connected system). The feeding of electricity into the grid requires the transformation of DC from the PV array into Alternating Current (AC) by a specialised, grid-controlled inverter. The inverters are connected to the transformer that will step up AC voltage to enable connection to the grid.

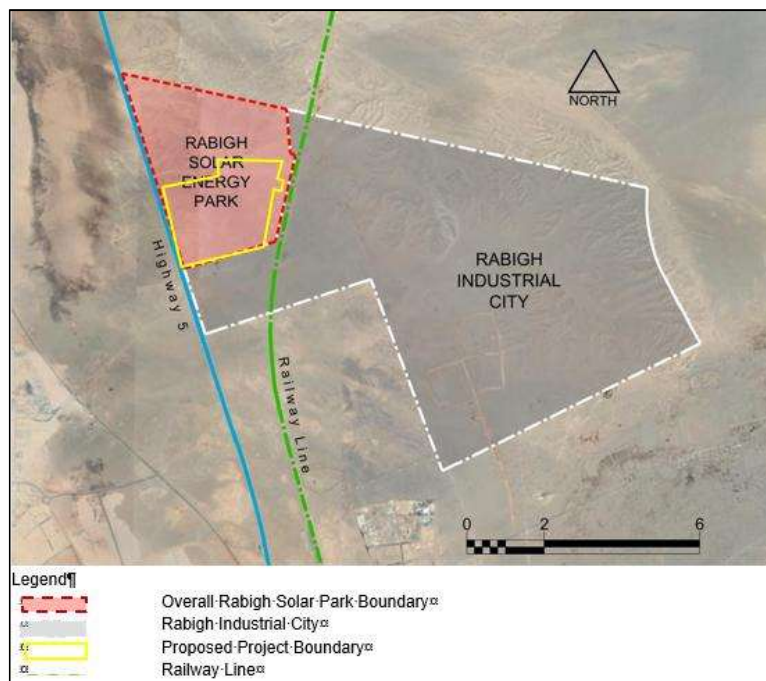


Figure 2-1: Park location in MODON's Rabigh Industrial City

3 Roles and Responsibilities

Responsibilities of parties of the Project are presented below.

The Developer has the overall responsibility of developing, reviewing, and updating the SEP. It will also on a regular basis, monitor and audit the implementation of the SEP. The Developer will provide appropriate training for their staff in relation to implementing the SEP.

The Developer will be responsible for day to day management and overseeing of the implementation of the SEP, ESMP and relative contract obligations of the contractors. This SEP should be periodically reviewed and its implementation monitored.

China Energy Engineering Group Guangdong Power Engineering Co., Ltd. has been appointed under an Engineer, Procure and Construct (EPC) contract to carry out the detailed project design, source plant and materials and construct the Project. Given the role in the Project, the EPC Contractor shall have the responsibility of managing the HSE performance of the majority of the workforce.

3.1 Contact Details

Key Parties	Contact Detail
Project Proponent	Renewable Energy Project Development Office (REPDO) Tel: 800 836 33 77 Email: info_repdo@moenergy.gov.sa
Project Developer / Operator	Consortium comprising Marubeni and AEW Contact Person: Andrea Oliva Designation: Project Manager Tel: +971 50 211 0593 Fax: +971 4 378 0950 Email: andrea-oliva@jpn.marubeni.com
Environmental Consultant	WSP Middle East Limited Contact Person: May Faraj Designation: Head of Environment and Sustainability Tel: +971 5668 473 95

	Fax: +971 6 598 1666 Email: may.faraj@wsp.com
EPC Contractor	China Energy Engineering Group – Guangdong Power Engineering Company Limited (GPEC) Contact Person 1: Luo Mingchun Designation: Project Manager Tel: +86 13826155360 Fax: +86 20 82220613 Email: mcluo3859@ceec.net.cn Contact Person 2: Lai Weizhi Designation: Environment supervisor Tel: +86 18666239530 Fax: +86 20 82220613 Email: wzlai4150@ceec.net.cn
Sub-contractors	TBD

4 Regulations and Requirements

4.1 Public Consultations under KSA Law

The General Environmental Regulations and Rules for Implementation (GERRI)¹ does not specify a requirement to undertake public consultation for environmental permitting purposes.

4.2 International Standards Requirements

The Project is committed to implementing all Project-related stakeholder engagement activities in accordance with the IFC Performance Standards (PS), considered best practice for industrial developments; and with the Equator Principles (EP), which represent a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risk in project financing.

The EPs apply to all new project financings with total capital costs of USD 10 million or more across all industry sectors globally. The EPs represent a framework for project financing, which is underpinned by the revised IFC Environmental and Social Review

Procedures (ESRPs) (July 2007), the revised IFC Social and Environmental Sustainability and PSs, new Sustainability Policy, and Disclosure Policy (effective 21 February 2006).

The extent to which the EPs apply to a project depends on whether the country in which the project is located is “Designated” or “Non-Designated”. Projects within Non-Designated countries such as Saudi Arabia are required to follow the standards and guidelines as set out in the IFC PSs and Environmental Health and Safety Guidelines.

4.2.1 Equator Principles

Of the Equator Principles (EPs), EP Five has the most relevance to this SEP. This principle states that “projects with potentially significant adverse impacts on Affected Communities will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to: the risks and impacts of the Project; the Project’s phase of development; the language preferences of the Affected Communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation” (Equator Principles, 2013).

EP 5 also makes provision for ensuring that the appropriate Assessment Documentation is made publicly available, early in the development process prior to construction and on an ongoing basis, in the local language and in a culturally appropriate way.

EP 6 also requires the establishment of a grievance mechanism which will be linked to this SEP. The grievance mechanism is required to be “designed to receive and facilitate resolution of concerns and grievances about the Project’s environmental and social performance”. The grievance mechanism should also “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”.

4.2.2 IFC Performance Standards on Environmental and Social Sustainability

The IFC updated its Performance Standards on Environmental and Social Sustainability in January 2012. The outcome-based PS updated existing IFC safeguard policies, strengthening environmental and social policy, and prescribing more comprehensive and integrated impact assessments. The IFC has also published Guidance Notes (GN) to help explain the requirements of the PS.

The Standards are divided into the following issue-specific section, with PS 1 being the most relevant to this SEP:

- PS 1: Assessment and Management of Environmental and Social Risks and Impacts.
- PS 2: Labour and Working Conditions.
- PS 3: Resource Efficiency and Pollution Prevention.
- PS 4: Community Health, Safety and Security.
- PS 5: Land Acquisition and Involuntary Resettlement.
- PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.
- PS 7: Indigenous Peoples.
- PS 8: Cultural Heritage.

PS 1 structures the way in which environmental and social issues are to be handled and serves as the core around which the other PS are framed. PS 1 stipulates that affected communities be appropriately engaged on issues that could potentially affect them. The specific objectives of this PS are:

- To identify and evaluate environmental and social risks and impacts of the project.
- To adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize risk & impacts, and, where residual impacts remain, compensate/offset for these risks and impacts to workers, affected communities, and the environment.
- To promote improved environmental and social performance of clients through the effective use of management systems.
- To create mechanisms for the responsive management of grievances from affected people and communities, as well as external communications from stakeholders.
- To promote and provide means for adequate engagement with affected stakeholders throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated.

PS 1 states that “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 ongoing 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 ongoing reporting to Affected Communities”.

5 Identification of Stakeholders

For the purposes of the Project, a stakeholder is defined as any individual or group who is potentially affected by a project or who has an interest in the project and its potential impacts. The objective of stakeholder identification is therefore to establish which organizations and individuals may be directly or indirectly affected (positively and negatively) by, or have an interest in, the project.

As a part of the development of the stakeholder consultation program for the ESIA, stakeholder identification was performed in order to determine all individuals, local communities, organizations, educational, research, and design organizations, and governmental authorities who might be potentially affected by or might affect the outcome of the proposed Project. The criteria used in the stakeholder identification process included the proximity of local residents' households to the Project site, the level of potential interest in the Project among federal and local governmental authorities, and scientists and local/international NGOs with interest or expertise. Different stakeholder groups were first identified in a stakeholder matrix that determined the level of potential interests and locations of the specific stakeholder group. It is noted that consultation with communities/citizens and land users for the Project will be undertaken through the relevant government ministries to ensure national procedural and legislative requirements are followed. The Developer will provide input into this process to ensure international standards are adhered to as far as practicable.

The following stakeholder groups were defined during the identification process:

- Government agencies related to the Project approval and review.
- Educational, research and design organizations.
- Non-governmental organizations (NGO' s) including Professional associations and Public organizations.
- Local citizens.
- Local communities.
- Land users.

Stakeholder identification is an ongoing process, requiring regular review and updating of the stakeholder database as the Project proceeds. The stakeholders identified to date for Rabigh Solar PV Independent Power Plant are detailed in Table below:

#	Name	Company	Phone Number	Email (visitors only)
1.	Sultan Abdulla Al Dowaihi	Communications and Information Technology Commission	0535399600	sawihi@citc.gov.sa
2.	Faris Al - Harthy	Aramco	0544841144	faris.harthy@aramco.com
3.	Khaled Al - Bukhari	Aramco Renewable Energy	0546633744	khaledalbukhari@aramco.com
4.	Assem Al Ghamdi	Ministry of Environment, Water and Agriculture	0546634008	ahalgamdi@mewa.gov.sa
5.	Ahmed Said Bajjan	Ministry of Environment, Water and Agriculture	0505362625	e4380117@mewa.gov.sa
6.	Faisal Al-Khalidi	Digital Transformation Unit	0564405900	fkhalidi@adu.gov.sa
7.	Abdulla Saeed Al-Osaimi	Higher Commission for Industrial Security	0555524375	asalosaimi@hq.moi.gov.sa
8.	Abdulaziz Al - Othman	General Authority of Ports	0502333366	a.alothman@mawani.gov.sa
9.	Abdulrahman Al-Sayari	General Investment Authority	0567759127	aalsayari@sagia.gov.sa

#	Name	Company	Phone Number	Email (visitors only)
10.	Ahmed Al-Otaibi	Ministry of housing	0555577075	a.alotaibi@housing.gov.sa
11.	Saud al - Al-Muslimi	Saudi Electricity Company	0553999239	shmusalmani@ngrid.sa
12.	Mehdi Al-Nabulsi	Saudi Electricity Company	0555274639	mrnabolsy@se.com.sa
13.	Raed Al Harthy	Saudi Electricity Company	0554507545	61796@se.com.sa
14.	Rowad s Azhari	Saudi Electricity Company	0542506056	ranour2@se.com.sa
15.	Naht Al-hbeal	Public Transport Authority	0531654241	nhubail@pta.gov.sa
16.	Nayef Hassan	Meteorology and Environmental Protection	0504308388	nhassans@pme.gov.sa
17.	Majed Fahad Al Thaqafi	General Authority of Civil Aviation	0555625371	malthagafi@gaca.gov.sa
18.	Mohammed al-Sw	Ministry of Transportation	0539111601	m.alsuwayed@mot.gov.sa
19.	Abdul Aziz Saleh Al Ghamdi	Ministry of Municipal and Rural	0566685811	aalghamdi@momra.gov.sa
20.	Abdullah Al Turki	Ministry of Municipal and Rural	0505248153	aturky@momra.gov.sa

#	Name	Company	Phone Number	Email (visitors only)
21.	Abdullah Alshaya	Ministry of Defence	0505461300	upstars10@gmail.com
22.	Ahmed Almnasir	Ministry of Defence	0555121661	ahmd121661@hotmail.com
23.	Faisal Al Fayez	SCTH - Saudi Commission for Tourism & National Heritage	0538000756	fayezfa@sctn.gov.sa
24.	Abdulaziz Al-Faraj	SCTH - Saudi Commission for Tourism & National Heritage	0565556698	alfararaja@scth.gov.sa
25.	Meshary Al-Fadel	The Ministry of Environment	0503200209	mafaadhel@mewa.gov.sa
26.	Anwar Al Nahdi	The Ministry of Environment	0504564391	a.alnahdi@pme.gov.sa
27.	Hatem Al Kaki	General Authority of Civil Aviation	0540007201	hkaki@gaca.gov.sa h.kaki@yahoo.com
28	Thorsten Rauch	South Rabigh Renewable Energy Company (SRREC)		thorsten.rauch@srrec-sa.com
29	Firoz Majeed	South Rabigh Renewable Energy Company (SRREC)		firoz.majeed@srrec-sa.com
30	Ahmed Alsubhi	South Rabigh Renewable Energy Company (SRREC)	0566040455	ahmed.alsubhi@srrec-sa.com
31	Guo Huojin	China Energy Engineering Group Guangdong Power Engineering Co. Ltd (CEEC-GPEC)	+8615112226521	hjguo0538@ceec.net.cn

6 Public Consultation and Disclosure

6.1 Summary of Consultation Activities

Information leaflets have been prepared by the Developer and distributed to the identified stakeholders. This is provided in Appendix A.

Numerous meetings have been held with the Stakeholders. The primary goals of these meetings were to:

- Describe the proposed Project and ESIA process.
- Discuss and identify potential Project impacts associated with the construction and operation of the wind farm.
- Identify the most effective ways of information dissemination in the future.
- Develop a list of stakeholders' groups and local people most likely to be affected by the Project.

A summary of key stakeholder observations is provided in Table 6-1 and ongoing consultation details are provided in Table 6-2.


The consultation and disclosure carried out to date will be developed further as the Project progresses into construction and operation.

Table 6-1: Summary of Key Stakeholder Observations

Date	Place	Stakeholder	Observations
Oct 30, 2018	Riyadh, Stakeholder Engagement Meetings	Ministry of Defence	A representative of the Ministry of Defence was asked to provide coordinates and sites for renewable energy projects. Mr. Sultan Al-Kahail confirmed that all the project data will be sent.
Oct 30, 2018	Riyadh, Stakeholder Engagement Meetings	Communications and Information Technology Commission	Request for more information related the pipeline renewable energy projects for Ministry of energy. Mr.Sultan Al-Khail these projects are part of the National Renewable Energy Program in KSA.
Oct 30, 2018	Riyadh, Stakeholder Engagement Meetings	Ministry of Municipal and Rural Affairs	Requested to coordinate between the competent authorities and the ministry to allocate the land for the ownership of the projects.
Oct 30, 2018	Riyadh, Stakeholder Engagement Meetings	PME	Inquiry from PME, If is there any direct negative impact on the population around the projects. Reference ESIA documentation.

Oct 30, 2018	Riyadh, Stakeholder Engagement Meetings	Communications Information Commission	and Technology	If any future plan to link renewable energy projects to the Digital National Centre office.
May 12, 2019	Riyadh	Saudi wildlife authority		Request as to whether solar energy projects affect migratory birds. The photovoltaic technology is considered as safe technology and does not constitute a direct threat that the seasonal migration of birds. There is no evidence that PV projects are a significant hazard to bird population. Reference ESIA.

Table 6-2: Ongoing Consultation Summary

N/A	Stakeholder	Stakeholder (Abv)	status	Remarks
1	Ministry of Defence (MOD).	MOD	MOD Replayed Whiting for predevelopment feed back	 بمجان مشاريع الطاقة المتجددة
2	Ministry of Interior	MOI	Replayed from Our Side	 مواقع أنظمة اصلة بوزارة msg.الداخلية.

				No objection
3	Communications and Information Technology Commission	CITC	REPDO send an email to CITC	 في الطاقة المتجددة. FW msg_ بخصوص البرنامج
4	Ministry of Communications and Information Technology	MCIT	Processing	A call & an email has been made to Mr. Al Rashed waiting for the response
5	ARAMCO	ARAMCO	No objection- by email	Received our data
6	Ministry of Environment, Water and Agriculture	MEWA	Processing	Received our data
7		NDU	No objection- by email	No objection- by email
8.	Mawani	Mawani	No objection- by email	No objection- by email
9.	Saudi Arabia investment authority	Sagia	No objection- by email	No objection- by phone
10.	Ministry of housing (MoH)	MoH	No objection- by email	No objection- by email
11.	Saudi Electricity	SEC	Processing	exchanging data

	Company (SEC).			
12.	Public transport authority	PTA	Processing	exchanging data
13.	General Authority of Civil Aviation.	GACA	Processing	Received our data
14.	Ministry of Transportation	MOT	Processing	No objection- by email –intersection in yanbu project / solved by predevelopment
15.	Ministry of Municipal and Rural Affairs (MOMRA)	MOMRA	No objection- by email	 برنامج خادم للطاقة المتجددة. RE msg.
16.	Saudi Commission for Tourism and National Heritage.	SCTH	Processing	No objection- by email
17.	General Authority for Meteorology and Environment	GAME	Processing	Waiting for some documents

18.	Saudi Wildlife Authority	SWA	Processing	Received our data
19.	Ministry of economy and planning	MEP	Processing	Received our data
20.	Public investment found	PIF	Processing	Received our data
21.	Saudi Arabia Riyal	SAR	Processing	Received our data
22.	Ministry of commerce and investments	MCI		Did not received our data
23.	Modon	MODON	No objection- by email	Received our data

6.2 Key Outcomes

The key topics arising from the above meetings were in relation to queries regarding how the solar farm would affect existing infrastructure, existing ecology and how it would benefit local communities in terms of employment opportunities and upgrade of infrastructure and how the development would affect human health.

The developer (REPDO) responded by way of provision of information regarding the proposed community benefits, for example through provision of local employment opportunities and the upgrade / construction of roads. The construction programme will be communicated to all affected communities, further details are outlined in Section 7.

Wood emphasised that the ESIA process looks at all potential effects of the project on environmental and social aspects; the results of the assessment will be used to influence the design of the project and mitigation measures will be recommended to minimize any potentially negative effects.

7 Future Stakeholder Engagement

Details of the proposed future stakeholder engagement programme are presented in the following sub-sections.

7.1 Future Stakeholder Engagement Programme

Future stakeholder events will be held to ensure Project information is disseminated via the relevant government authorities to the relevant stakeholders including members of the local community.

7.2 Temporary Land Users

Going forward, engagement activities will be undertaken through the relevant ministries to ensure that all land users, including those who use and/or access the land for livestock and temporary camps, are identified and sufficient information is provided.

7.3 Disclosure

The ESIA will continue to be made available to the public through the internet.

Following approval of funding for the Project, an announcement of the full decision to develop the site will be confirmed to stakeholders through press announcements, the internet (company website), local newspapers and information boards/announcement in respective communities' buildings (where appropriate).

Further updates to the Project after the initial Disclosure exercise will be communicated with the community by way of meetings or letters where appropriate.

7.4 Other Engagement Activities

Stakeholders will be engaged throughout the implementation process for consultation, information dissemination and grievance management. There will be continuous sharing

of Project information with Government departments and relevant businesses in order for stakeholders to be informed about construction activities and progress, to minimize grievances, and to manage expectations.

7.5 Methods of Communication

The methods of communication to be utilised by the Client will include:

- Publication of ESIA and SEP.
- On-going Consultation
- Future consultation events will be held to ensure Project information is disseminated to the relevant government departments and businesses.
- Disclosure of monitoring reports.

7.6 Future Stakeholder Engagement Programme

Details of the anticipated future stakeholder engagement programme is outlined below.

Table 7-1: Future Stakeholder Engagement Programme

Activity/Project	Project Timescales	Type of Activity to be Undertaken / Information Disclosed	Locations and Dates of Meetings / Forms of Communication	Stakeholder Groups
Land users.	Pre-Construction and Construction	<p>Engagement with relevant government ministries to:</p> <ul style="list-style-type: none"> establish use of site and inform associated management / future consultation plan. communicate management / mitigation measures pre-construction. communicate regarding construction programme and associated access to site, particularly in relation to temporary land users / livestock grazers. 	<p>Pre-construction land use consultation. Pre-construction information meetings. On-going monthly meetings.</p>	<p>Government (national, regional and local). Advisory / non-government organisations. Local communities. Land users.</p>
Stakeholder Meeting.	Pre-Construction and Construction	<p>Engagement with relevant government ministries to:</p> <ul style="list-style-type: none"> update on project progress during construction, including introduction and presentations on project schedules and timescales, details of construction work, abnormal load transportation timescales and management, operations plan, updates to the ESMP, ESAP and SEP. provide information relevant to local community regarding construction programme and associated access to site, construction workforce / camp. monthly meetings to track perceptions, discuss issues and review Project impacts resulting from construction workforce, discuss any community grievances raised to government authorities. 	<p>Pre-construction information meetings. On-going monthly meetings. Information board/ announcement in respective communities' buildings. Locations to be confirmed.</p>	<p>Government (national, regional and local). Advisory / non-government organisations. Local communities. Land users.</p>
Stakeholders to be informed should chance finds be discovered.	Construction.	Notification to relevant government ministries should chance finds be discovered. Detail regarding chance find to be provided.	As required	Local Government Local communities Land users

<p>Stakeholder announcements of any changes to construction programme to local residents.</p>	<p>Construction</p>	<p>Details of any future changes to proposed construction programme including proposed work on local roads and transportation programme for major components to be provided to government ministries.</p>	<p>As required: Press announcements Internet – company website. Local newspapers/radio. Information board/announcement in respective communities' buildings. Distribution of information leaflets to local residents. Erection of signs along the transportation route.</p>	<p>Government (national, regional and local) Advisory/non-government organisations Local communities Land users</p>
<p>Announcement of the Project's commissioning and start-up.</p>	<p>Operation</p>	<p>Formal notification of operation of the Wind Farm.</p>	<p>As soon as possible after commissioning, if not before: Internet – company website. Local newspapers/radio. Information board / announcement in respective communities' buildings. Public meeting.</p>	<p>International Government (national, regional and local) Advisory/non-government organisations Institutions (universities etc.) Local communities Temporary land users</p>
<p>Announcements on maintenance activities which may impact on local stakeholders</p>	<p>Operation</p>	<p>May include road closures for transportation of equipment, etc to be provided to government ministries.</p>	<p>As required: Internet – company website. Local newspapers/radio. Information board / announcement in respective communities' buildings.</p>	<p>Local government Local communities Land users</p>

Employees	Construction / Operation	Internal meetings, employees and managers. grievance mechanism.	On-going with monthly review.	Company Management HSE Manager
Provision of Project information via information boards	Construction / Operation	Information board to be installed at Project site entrance with key Project information and Project contact details. Additional information boards to be installed at entrance to Project site access points to provide key Project information, Project contact details and targeted information regarding access restrictions / construction schedule. Boards to be reviewed on a regular basis to ensure information is up to date.	Information boards.	Land users.

7.7 Community Health and Safety Management

Community health and safety is a key issue that has to be managed during construction works and, although not specifically part of the SEP, a Community Health and Safety Plan (CHSP) should be developed describing the potential hazards of the Project during construction and commissioning to local communities and detailing how these will be controlled. The document also outlines emergency preparedness and response and sets out the grievance mechanism to ensure feedback is acknowledged and addressed appropriately. The CHSP requires that a number of measures are put in place and implemented prior to and during construction relating to community health and safety. Such mitigation measures should also be communicated to the local communities and for this reason they have been summarised in the table below alongside details of associated actions.

Table 7-2: Community Health and Safety Management

Measure	Action
Full and comprehensive public consultation will be undertaken with the local communities to ensure that local people are aware of the construction programme and timescales, in particular highlighting timing of equipment/construction materials deliveries.	Public notifications to be communicated to local community at on-going pre-construction consultation meetings. Consultation meetings will continue throughout construction.

<p>Signs are required to be erected around the site to inform the local community / land users of the location of construction activities. Fencing will be placed around all excavations to prevent unauthorised access.</p> <p>Signage and fencing will also be utilised to demarcate areas not accessible for agricultural purposes.</p>	<p>Keep Project plant and equipment to pre-defined routes and areas.</p> <p>Signs will be erected along roads to inform of risk areas, construction roads and public roads, written in appropriate local language and English.</p> <p>Additional road signs will be placed whenever a new road is constructed.</p> <p>Consultation meetings to cover issues relating to traffic signs, safety and potential accidents. Provide information to local communities / land users that they should not enter the construction areas.</p>
<p>An emergency action plan will be required detailing the action to be taken in the event of an emergency situation, this will cater for the potential for local people to be in the vicinity of the Project site and measures for their evacuation. The local community will be made aware of evacuation procedures in the event of a fire.</p>	<p>Communicated to local community at monthly consultation meetings.</p>
<p>The local communities will be notified about the construction schedule and its progress to ensure that there is an understanding of existing site activities and activities to be undertaken in the future. Public training for safety will be carried out to avoid accidents occurring and signs erected on roads to clearly indicate the route of construction</p>	<p>Local communities will be made aware of the construction schedule.</p> <p>Traffic signs will be erected in English and an appropriate local language. The local community will also be made aware of any future changes to the schedule.</p>

traffic.	
<p>Information board to be installed at Project site entrance with key Project information and Project contact details.</p> <p>Additional information boards to be installed at entrance to Project site access points to provide key Project information, Project contact details and targeted information regarding access restrictions / construction schedule. Boards to be located strategically and targeted at land users.</p>	<p>Boards to be installed at Project entrance during mobilization works.</p> <p>Boards to be installed at strategic locations across site.</p> <p>Boards to be reviewed on a regular basis to ensure information is up to date.</p>
<p>Project site animal grazers / land users will be notified in advance of construction schedule to allow land users to plan grazing /other activities in advance.</p>	<p>Community engagement prior to commencement of construction activities to discuss safe grazing areas with local communities.</p>
<p>As part of pre-construction engagement activities, ensure that traffic safety and “rules of the road” are discussed with local communities. Discuss and address community concerns. Special sessions may be required for particularly vulnerable groups such as children. At minimum communicate type, frequency and traffic risks before heavy traffic begins for the construction phase. Ensure that appropriate hazard warning signage is used along roads.</p>	<p>Community engagement sessions to be held prior to commencement of construction activities to discuss road safety with local communities/land users.</p>
<p>Measures to alert the communities of an emergency arising will be implemented. These include:</p> <ul style="list-style-type: none"> • Audible alarms; • Face to face communications; • Vehicle mounted speakers; • Communicating details of the nature of the emergency; • Communicating protection options (evacuation, restricted access). 	<p>Emergency measures to be implemented.</p>

<p>Client will inform local communities of potentially significant hazards and summarise response plans in a culturally appropriate manner. Should plans be altered or tested, local communities will be informed of this.</p>	<p>To be addressed through consultation meetings. Signs will be erected in appropriate local language and English warning of potential hazards.</p>
<p>Noise monitoring will be carried out to ensure noise from construction activities fall within established limits and do not negatively impact on the surrounding environment.</p>	<p>Construction confined to daylight hours to minimise noise disturbance. Community relations personnel will make local communities aware of any changes.</p>
<p>Provision of toolbox talks to workers to raise awareness of risks to community.</p>	<p>Local community safety will be regularly discussed during workers daily toolbox talks.</p>
<p>Increased Project waste and effluents through construction works and workforce/worker camp could potentially increase pressure on local waste management services and infrastructure. Implement the Waste Management Plan to ensure that all waste generated by the Project (including sewage waste) is disposed of in line with Ukrainian Law and international best practices.</p>	<p>Waste Management Plan to be implemented and audited periodically.</p> <p>Regular (monthly) community meetings to discuss / review Project impacts resulting from construction workforce.</p>

<p>Construction workers could lead to the introduction and increased occurrence of communicable diseases within the workforce and the local communities.</p> <p>Ensure health screening is conducted for employees and contractors before contracting workers and on a periodic basis throughout their employment/contract.</p> <p>As part of health and safety induction for workers, provide awareness training on communicable disease prevention. Provide this training on an ongoing basis.</p> <p>Work in collaboration with an onsite medical team to ensure that such awareness and education training is appropriately provided to workers and contractors.</p> <p>Identify opportunities to support local public health campaigns that focus on prevention of communicable diseases.</p>	<p>Communicable disease awareness training to be provided as part of worker health and safety induction training, Regular, on-going training also to be provided.</p> <p>Regular (monthly) community meetings to discuss / review Project impacts resulting from construction workforce.</p>
<p>Increased risks to community safety and security are likely as a result of construction workers and other individuals to the area as well as posing a threat to security, primarily in relation to their property and potential unruly or destructive behaviour. The concern is based on the perception that workers and contractors in particular, can be disruptive or may be willing to commit petty crimes, such as theft, following the consumption of alcohol.</p> <p>Potential risks to local communities may exist from both workers and other migrants attracted to</p>	<p>Project Security to receive Code of Conduct training as part of their induction program.</p> <p>Regular (monthly) community meetings to discuss / review Project impacts resulting from construction workforce.</p>

<p>the area in search of income generating opportunities.</p> <p>Ensure that Project security is aware of the Project's goals to establish good relationships with local stakeholders; the grievance mechanism for communities to voice concerns; and receives human rights and cultural sensitivity training to ensure the respect and protection of the local community.</p> <p>Develop a Code of Conduct for security personnel, which outlines appropriate conduct, engagement and appropriate use of force.</p> <p>Ensure all security personnel read and sign code of conduct as part of their induction program.</p>	
<p>Introduce head of security personnel to neighbouring communities and outline the necessary safety precautions that will need to be put in place to ensure both the safety of the Project and safety of local communities.</p> <p>Community safety meetings should be organised with all potentially affected groups and be conducted in advance of construction activities.</p>	

8 Monitoring and Reporting

8.1 Introduction

Through communication channels such as the presentation of announcements at local community buildings, media and periodic meetings as listed above, the Developer will monitor and provide feedback as appropriate.

8.2 Review of the SEP during Construction Phase

Stakeholder engagement during the construction phase will relate to all activities leading up to and during the physical construction of the Project infrastructure, as well as the management of contractors and construction contracts. Engagement with stakeholders during construction is primarily about involving stakeholders in assessing whether previously identified mitigation measures are working as intended, being responsive to grievances and identifying alternatives where there are failings

9 Grievance Mechanism

9.1. Overview

The grievance mechanism will be developed in accordance with national legislation in the first instance and where possible will meet the following requirements of the IFC's Performance Standards and Guidance Notes. The mechanism should include:

- Establish a procedure for receiving, recording or documenting and addressing complaints that is easily accessible, culturally appropriate, and understandable to affected communities.
- Inform the affected communities about the mechanism during the company/community engagement process.
- Consider when and how to seek solutions to complaints in a collaborative manner with the involvement of the affected community,
- Address concerns promptly, using an understandable and transparent process that is readily accessible to all segments of the affected communities—and at no cost and without retribution.
- Ensure full participation of both genders and vulnerable groups.
- Take into consideration customary and traditional methods of dispute resolution when designing the system.
- Assign consistent, experienced, and qualified personnel within the company with responsibility for receiving and responding to grievances.
- Establish a redress mechanism so those who feel their grievances have not been adequately addressed have recourse to an external body for reconsideration of their case.
- Document grievances received and responses provided and report back to the community periodically.
- Provide periodic reports on issues that the grievance mechanism has identified as of concern to those communities.

The objective of the grievance procedure is to ensure that all comments and complaints from people directly affected by the Project are processed and considered in an appropriate way. Furthermore, the grievance mechanism should contain the corrective actions needed to be implemented in relation to complaints received with guarantees that

the complainant is being informed of the outcome. The means by which stakeholders may make comments and complaints must be appropriate to their culture. The flowchart below shows a general mechanism of processing the complaints.

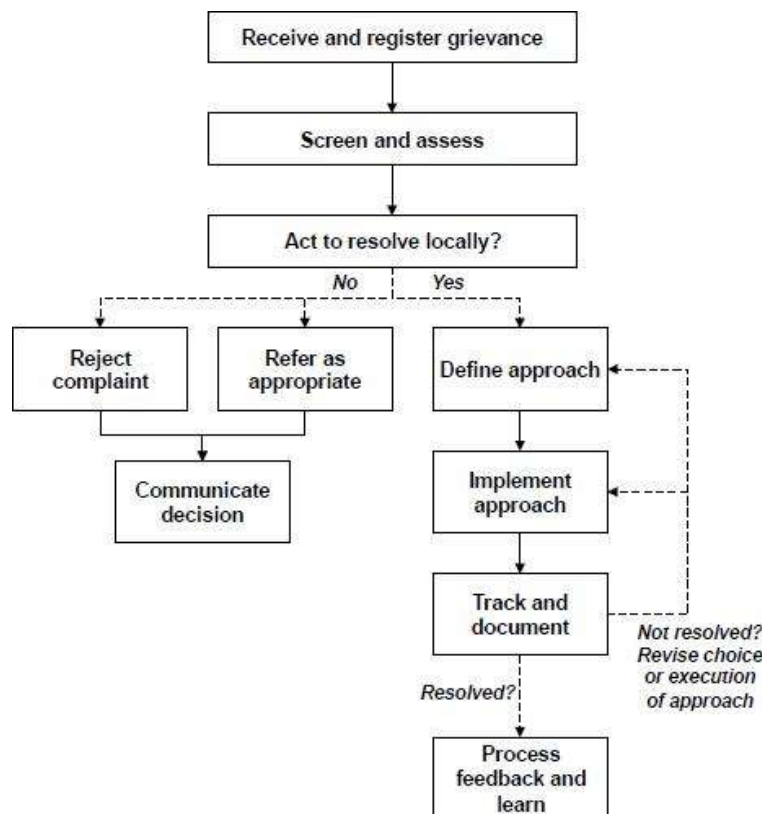


Figure 9-1:Grievance Mechanism Process

The following table provides examples of the types of grievances that are typically encountered on a major construction project such as this.

Table 26-1: Examples of Grievances

Type of Grievance	Complainant(s)	Example
Relatively minor and onetime problems related to company operations.	An individual or family.	A company truck damaging a community member's fence; a one-time disrespectful encounter between a company employee and a community member.
Relatively minor but repetitive problems related to company	An individual or family or	Livestock getting loose because company

Type of Grievance	Complainant(s)	Example
operations.	small group of people.	employees fail to close gates.
Relatively minor but repetitive and widespread problems.	Multiple individuals, families, or larger groups.	Company-related road traffic raising dust that settles on clothes hung out to dry.
Significant and larger repetitive problems.	Community groups, non-governmental or community-based organizations, or local governments.	Company blasting allegedly causing structural and/or aesthetic damage to building.
Major claims that company activities have resulted in significant adverse impacts on larger populations of people.	Community groups, non-governmental or community-based organizations, or local governments.	Company operations adversely impacting a community's water supply, making it unsafe for drinking, livestock, and/or irrigation.
Major claims over policy or procedural issues.	Non-governmental organizations, community groups or community-based organizations, or local governments.	A company's non-compliance with its own policies; failure to follow guidelines of multilateral lenders for adequate consultation to achieve prior and informed consent; inadequate resettlement and compensation of affected populations.

9.2. Community Expectations

When local people present a grievance, they generally expect to receive one or more of the following:

- Acknowledgment of their problem.
- An honest response to questions about company activities.
- An apology.
- Compensation.
- Modification of the conduct that caused the grievance.

- Some other fair remedy.

In voicing their concerns, they also expect to be heard and taken seriously. Finally, the Client, contractors, or government officials must convince people that they can voice grievances and work to resolve them without retaliation.

9.3 Grievance Resolution Mechanism

Local people need a trusted way to voice and resolve concerns linked to a project's operations. A locally-based grievance resolution mechanism provides a promising avenue by offering a reliable structure and set of approaches where local people and the company can find effective solutions together. The Client will develop and implement a grievance mechanism which:

- Increases the likelihood that small disputes can be brought to a conclusion relatively quickly before they become deep-seated grievances.
- Keeps ownership of the dispute in the hands of local people.
- Offers an early, efficient, and less costly way to address concerns.
- Promotes a more stable business climate for companies that reduces risk and enhances accountability to the host community.

A successful grievance mechanism can help achieve the following goals:

- Open channels for effective communication.
- Demonstrate that a company is concerned about community members and their well-being.
- Mitigate or prevent adverse impacts on communities caused by company operations.
- Improve trust and respect.
- Provide structures for raising, addressing, and resolving issues that reduce imbalances in power.
- Promote productive relationships.
- Build community acceptance of a company's "social license" to operate.

At all times, the Client will accept comments and complaints concerning the Project in both verbal and written formats. An example of a Grievance Form is provided in Appendix B.

The key aspects of the grievance mechanism are described below:

(1) Responsibilities

Any person or organisation may send comments and/or complaints in person or via post, email, or facsimile using the following contact information. It is anticipated that an Environmental Manager and/or Environmental Health and Safety Manager will be appointed to oversee the implementation of all project environmental and social requirements. These appointments are expected to be in place prior to the start of construction at the latest.

Table 26-2 Responsible Persons and Contact Details

Client	EPC
Consortium comprising Marubeni and AEW Contact Person: Andrea Oliva Designation: Project Manager Tel: +971 50 211 0593 Fax: +971 4 378 0950 Email: andrea-oliva@jpn.marubeni.com	China Energy Engineering Group – Guangdong Power Engineering Company Limited (GPEC) Contact Person 1: Luo Mingchun Designation: Project Manager Tel: +86 13826155360 Fax: +86 20 82220613 Email: mcluo3859@ceec.net.cn

In addition to the above contact details, a mailbox will be provided at the site entrance to allow local people to raise grievances in a more informal way.

(2) On Receiving a Grievance

The comments and complaints will be summarised and listed in a Complaints/Comments Log Book, containing the name/group of commenter/complainant, date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant.

(3) Assessing the Grievance

During the assessment, the team gathers information about the case and key issues and concerns and helps determine whether and how the complaint might be resolved. The Client will:

- Determine who will conduct the assessment. Typically, the complaints coordinator performs this task or directs it to an appropriate staff or department for assessment (production, procurement, environment, community relations, human resources).
- Select a company member to engage directly with the complainants to gain a first-hand understanding of the nature of the complaint.

- Clarify the parties, issues, views, and options involved:
 - Identify the parties involved.
 - Clarify issues and concerns raised by the complaint.
 - Gather views of other stakeholders, including those in the company.
 - Determine initial options that parties have considered and explore various approaches for settlement.
- Classify the complaint in terms of its seriousness (high, medium, or low).
Seriousness includes the potential to impact both the company and the community.

Issues to consider include the gravity of the allegation, the potential impact on an individual's or a group's welfare and safety, or the public profile of the issue. A complaint's seriousness is linked to who in the company needs to know about it and whether senior management is advised.

Rather than resorting to a purely unilateral "investigate, decide, and announce" strategy, engage more directly with the complainant in the assessment process, and involve the complainant in influencing the resolution process to be selected, and settlement options.

(4)9.3.4 Formulation a Response

The system for responding to the complainant should specify who communicates and how.

In some cases, it may be appropriate that feedback be provided by the staff member responsible for assessment accompanied by the coordinator of the complaints procedure.

The site manager may participate in feedback, depending upon the seriousness of the complaint.

When formulating a response the Client will ensure that:

- The complaint coordinator or relevant department may prepare the response. The response should consider the complainants' views about the process for settlement as well as provide a specific remedy. The response may suggest an approach on how to settle the issues, or it may offer a preliminary settlement.
- To present and discuss the response to the complainant, consider holding a meeting with the complaint coordinator, relevant company manager, and the complainant. If a direct meeting is not possible, consider meeting with a neutral third party serving as facilitator. The group would also discuss appropriate next steps during this meeting. If the proposal is a settlement offer and it is accepted, the complaint is resolved

successfully and there is no need to proceed to the next step of selecting a resolution approach. If the complainant is not happy with the response about a resolution process or substance, the group should try to reach an agreement that would be mutually acceptable.

- If the case is complex and a resolution time frame cannot be met, provide an interim response—an oral or written communication—that informs the person of the delay, explains the reasons, and offers a revised date for next steps.

All comments and complaints will be responded either verbally or in writing, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form. Comments will not be considered as complaints and may not, therefore, be responded to unless the commenter requests a response.

The Client will respond to the complaint within one week. It is possible that some responses may take longer than one week to implement, but even in those instances the Client will inform the complainant what actions will be taken and when.

(5)Track and Monitor Grievances

Grievances need to be tracked and monitored as they proceed through the system. Effective tracking and documentation accomplishes several goals:

- Document the severity of a complaint (high, medium, low) according to specific criteria. The level of severity guides requirements for alerting senior management and determines the seniority of management oversight needed.
- Provide assurance that a specific person is responsible for overseeing each grievance—from receipt and registration to implementation.
- Promote timely resolution.
- Inform all concerned (the complainant and appropriate company personnel) about the status of the case and progress being made toward resolution.
- Document the company's response and outcome(s) to promote fairness and consistency.
- Record stakeholders' response(s) and whether additional research or consultation is needed.
- Provide a record of settlements and helps develop standards and criteria for use in the resolution of comparable issues in the future.

- Monitor the implementation of any settlement to ensure that it is timely and comprehensive.
- Provide data needed for quality control measures, to assess the effectiveness of the process and action(s) to resolve complaints.
- Identify learning from specific cases to be used later to assess the effectiveness of the mechanism or address systemic issues that may require changes in company policies or performance.

In order to ensure that grievances are tracked and documented the Client will provide the following:

- Tracking forms and procedures for gathering information from company personnel and complainant(s).
- Dedicated staff to routinely update the database of grievances.
- Periodically review information so as to recognize grievance patterns, identify any systemic causes of grievances, promote transparency, publicize how complaints are being handled by the company, and periodically evaluate the overall functioning of the mechanism.
- Processes for informing stakeholders about the status of a case (such as written status reports).
- Procedures for provision of regular reporting of grievances and resolutions.

(6)Grievances Received to Date

[TO BE REVIEWED AND UPDATED]

Table 26-3: Grievances Received to Date

Date	Grievance	Action Taken

10 Conclusions

This document describes the key stakeholders and information / communication plans required for the Project. It takes into consideration international standards including IFC Performance Standards and the Equator Principles. The aim of the Plan is to ensure that adequate and timely information is provided to Project-affected people and other stakeholders with opportunities given for people to raise any opinions or concerns they may have on the Project.

The SEP is a live document and will be reviewed and updated periodically throughout pre-construction, construction and operation of the Project.

Example Grievance Form

I, (full name)

Resident at:	
Tel:	Fax:
E-mail:	

Wish to raise the following complaint or concern (include location and duration of problem):
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Suggestions to solve problem:

Preferred method of communication (verbal, written, other):

Signed:	Date:
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—END—