



Hamriyah Independent Power Plant (IPP) Project

Stakeholder Engagement Plan (SEP)

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Glossary of Terms

Term	Definition
Consultation	Consultation is a two-way process of dialogue between the project company and its stakeholders. Stakeholder consultation is about initiating and sustaining constructive external relationships over time.
Grievance Mechanism	Procedure provided by a project to receive and facilitate resolution of affected communities' concerns and grievances about the project's environmental and social performance.
Environmental and Social Impact Assessment (ESIA)	A forward-looking instrument that is able to proactively advise decision-makers on what might happen if a proposed activity is implemented. Impacts are changes that have environmental, political, economic, or social significance to society. Impacts may be positive or negative and may affect the environment, communities, human health and well-being, desired sustainability objectives, or a combination of these.
Information Disclosure	Disclosure means making information accessible to interested and affected parties (stakeholders). Communicating information in a manner that is understandable to stakeholders is an important first and ongoing step in the process of stakeholder engagement. Information should be disclosed in advance of all other engagement activities, from consultation and informed participation to negotiation and resolution of grievances. This will make engagement more constructive.
Stakeholders	Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project or the ability to influence its outcome, either positively or negatively.

Source: Based on International Finance Corporation Good Practice Handbook on Stakeholder Engagement (2007)

Acronyms

Acronym	Term
AC	Affected communities
CESMP	Construction Environment and Social Management Plan
CHS	Community Health and Safety
CLO	Community Liaison Officer
EA	Environmental Assessment
EHS	Environment, Health and Safety
ESIA	Environmental and Social Impact Assessment
EMP	Environmental Management Plan
EPRP	Emergency Preparedness and Response Plan
ESA	Environment and Social Assessment
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
NGO	Non-Governmental Organisation
NTS	Non-Technical Summary
OHS	Occupational Health and Safety
PRs	Performance Requirements
SEP	Stakeholder Engagement Plan

1 Introduction and Project Summary

1.1 Overview

The Sharjah Electricity and Water Authority (SEWA) in the Emirate of Sharjah, United Arab Emirates (UAE) awarded a consortium of GE Energy Financial Services Inc, a subsidiary of General Electric Company (GE), and Sumitomo Corporation (the 'developer' or consortium) the proposal to design, build, own and transfer a new 1,800MW independent power project (IPP, the Project). The proposed IPP will be located within the Hamriyah power and water Plant (HWPP), on the Arabian Gulf coastline near the Hamriyah Free Zone.

The project will be largely financed by international lenders and private financing institutions, many of whom are signatories to or follow the Equator Principles (EPs), or require projects to which they provide financing to comply with IFC Performance Standards and World Bank Guidelines. The EP, IFC Performance Standards and World Bank Guidelines will require the Project to perform an environmental and social impact assessment (ESIA) study to adequately identify and mitigate potential impacts.

This Stakeholder Engagement Plan (SEP) is designed to promote the Project's approach to stakeholder engagement throughout its lifecycle. Therefore, the scope of this SEP covers all Project phases including from ESIA scoping to post-ESIA submission, as well as the construction and operations phase.

1.2 Objectives of this Stakeholder Engagement Plan

This SEP is a strategic document for planning a comprehensive and culturally appropriate approach to consultation and disclosure for the lifecycle of the Project. The purpose of this SEP is to provide a consultation and participation strategy for the Project which:

- Defines Project's legal requirements concerning disclosure and consultation.
- Identifies stakeholder groups that could be affected or may have an interest in the Project.
- Ensures that such stakeholders are appropriately engaged through a process of information disclosure and meaningful consultation on environmental and social issues that could potentially affect them.
- Maintains a constructive relationship with stakeholders on an on-going basis through meaningful engagement during project implementation.
- Provides a grievance mechanism to allow stakeholders to register complaints, queries or comments that are addressed in a timely manner by the Project.

1.3 Project Description and Location

Given the increasing demand for electricity generation in the Emirate of Sharjah, SEWA is committed to expand the generation capacity of the existing HWPP. The Developer submitted a proposal to SEWA to build, own, transfer a 1,800MW combined-cycle power plant. The proposed project will be developed adjacent to the existing power and desalination plant and will consist of three combined cycle units.

The Project will be developed within the HWPP complex and will be adjacent to the existing plant, 600m south of Hamriyah port, adjacent to and west of Hamriyah Free Zone Area (HFZA) about 1.2km north of Al Zahwra power and desalination plant located in the emirate of Ajman (see Figure 1).

Figure 1: Project location



Source: Mott MacDonald

2 Stakeholder Engagement Requirements

2.1 Overview

This chapter sets out the regulatory requirements relevant to the involvement of stakeholders in the Project. This SEP has been produced to meet the legislation and policy regulations of the Government of UAE and to meet the information disclosure, consultation and stakeholder participation requirements of the International Finance Corporation (IFC) and World Bank. These requirements are summarised below.

2.2 National Regulations

Currently there are no national requirements to undertake stakeholder engagement as part of the ESIA process within the UAE.

2.3 International Requirements

The project will be largely financed by international lenders and private financing institutions, many of whom are signatories to the Equator Principles and/or require projects to comply with IFC Performance Standards and World Bank Guidelines. These international requirements are described below.

2.3.1 Equator Principles III (Eps)

The EPs 2006 have been developed by leading financial institutions as a voluntary set of guidelines for managing environmental and social issues in project finance lending. Of the ten EPs, Principle 5 on consultation and disclosure outlines required practice regarding information disclosure, consultation and stakeholder engagement. In summary, the borrower is required to:

- Consult with project-affected communities in a structured and culturally appropriate manner;
- Ensure project-affected communities' free, prior and informed consultation and facilitate their informed participation as a means to establish whether a project has adequately incorporated their concerns;
- Make available the assessment documentation and action plan, or non-technical summaries thereof to the public for a reasonable minimum period in the relevant local language and in a culturally appropriate manner;
- Take account of and document the process and results of the consultation, including any actions agreed resulting from the consultation; and
- For projects with adverse social or environmental impacts, ensure disclosure occurs early in the assessment process before the project construction commences, and on an ongoing basis.

EP 6 on grievance mechanisms also states a requirement to ensure that a grievance mechanism is established that is scaled to the risks and potential impacts of the project.

The EPs state that projects are required to demonstrate compliance with IFC Performance Standards (PS), which also have specific requirements for consultation as specified in section 2.3.2.

2.3.2 International Finance Corporation (IFC) Performance Standards (PS)

The eight IFC PSs have specific consultation requirements and these are embedded in the general requirements specified in PS1 'Social and Environmental Assessment and Management Systems'. The requirements for stakeholder engagement in projects are:

- For the Company to have a policy and/or strategy setting out the commitment to engagement, with mention of Affected Communities and relevant standards;
- Start as early as possible in the project planning process to have meaningful influence;
- Continue throughout the life of the project;
- Be free of external manipulation, interference, coercion, or intimidation;
- Where applicable, enable meaningful community participation; and
- Be conducted on the basis of timely, relevant, understandable, and accessible information in a culturally appropriate format.

For projects categorised as 'Category B', consultation must be undertaken during the ESIA phase in order to inform the ESIA.

2.3.3 World Bank Operational Policy (OP) 4.03

The World Bank's (WB) Performance Standards (PS) embodied in OP4.03 are a set of eight performance standards (PSs) that set a framework of requirements to be addressed in an international ESIA. WB PS1 specifically refers to the need for and means of achieving community engagement, disclosure of relevant project information, appropriate consultation processes and grievance mechanisms throughout the project lifecycle. The extent and degree of engagement required by the consultation process should be commensurate with the project's risks and adverse impacts and with the concerns raised by the affected communities (ACs).

The requirements for stakeholder engagement in projects are:

- Start as early as possible in the project cycle
- Continue throughout the life of the project
- Conduct engagement based on timely, relevant, understandable and accessible information in a culturally appropriate format
- Focus inclusive¹ 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
- Be documented

The outcomes of consultation are to be incorporated into aspects of the project that directly affect ACs such as mitigation and benefits-sharing measures. The views of both men and women need to be captured and documented.

¹Such as men, women, the elderly, youth, displaced persons, and vulnerable and disadvantaged persons or groups.

3 Identification of Stakeholders and Communication Methods

3.1 Overview

Stakeholders are persons or groups who are directly and/or indirectly affected by the Project or have interests in the Project and who have the potential to influence project outcomes or operations. Identifying them is essential to meaningful stakeholder engagement in pursuit of maintaining productive relationships.

3.2 Stakeholder Identification and Analysis

A stakeholder mapping exercise was carried out to provide a strategically focused stakeholder list with targeted means of engaging with them. An analysis of all Project stakeholders, interests, and suggested communication and consultation methods is summarised in Table 1. Identification of additional relevant stakeholders should be carried out throughout the Project lifecycle, as detailed in the Stakeholder Engagement Programme in section 4.3.

Table 1: Identification of Stakeholders and Consultation Methods

Stakeholders	Communication and consultation methods
Internal Stakeholders	
Employees	Employee noticeboards and correspondence
Temporary construction workers, subcontractors	Employee noticeboards and correspondence
External stakeholders	
Community members	
Emirate of Sharjah residents	Public bulletins, announcements
Governmental agencies	
Sharjah Municipality	Private meetings and consultation
Environment and Protected Areas Authority (EPAA) in Sharjah	Private meetings and consultation
Ajman Municipality	Private meetings and consultation
Hamriyah Free Zone Authority	Private meetings and consultation
Ministry of Climate Change and Environment	Private meetings and consultation
The Hamriyah Power and Desalination Station	Private meetings and consultation
Federal Electricity and Water Authority	Private meetings and consultation
SEWA Electricity and Water Authority	Private meetings and consultation
Al-Hamriyah Cooperative Association for Fishermen	Private meetings and consultation
Hamriyah Municipality	Private meetings and consultation

Stakeholders	Communication and consultation methods
Sharjah National Oil Company (SNOC)	Private meetings and consultation
Local media	Public bulletins and announcements
Health and emergency services of Sharjah, Ajman and Hamriyah Municipalities	Private meetings and consultation
<i>Other stakeholders identified</i>	Public bulletins and announcements or private meetings, as applicable

4 Stakeholder Engagement Programme

This section describes the main activities that have and will be undertaken throughout the ESIA process and on an on-going basis throughout the life of the Project.

4.1 Roles and Responsibilities

As part of the ongoing engagement strategy with stakeholders, the Project will be required to ensure there is an available community liaison officer (CLO)² whose responsibilities include:

- Managing the implementation of the SEP;
- Managing the implementation of the grievance mechanism including logging and tracking each grievance received
- Undertaking meetings with stakeholders including project-affected communities to talk to keep them informed of project activities (in particular the Project's schedule) and likely impacts and mitigation measures
- Recording and reporting of stakeholder engagement and information disclosure activities

The CLO will be responsible for community liaison and arranging communications with Project affected people throughout all stages of the Project.

4.2 Previous Stakeholder Engagement Activities

Stakeholder engagement activities have been undertaken throughout the ESIA scoping and study phases, as summarised in Table 2 below.

Table 2: Previous stakeholder engagement activities conducted

Date	Stakeholders	Summary of key issues discussed
2018-04-23	<ul style="list-style-type: none"> • Environment and Protected Areas Authority (EPAA) – Emirate of Sharjah 	Applicable environmental permit authorisation process, importance of specialised studies and environmental monitoring data to be acquired
2018-06-11	<ul style="list-style-type: none"> • Ajman Municipality - Environment and Planning Department 	Questions and concerns around potential environmental impacts including on air quality, marine environment and noise were discussed
2018-06-18	<ul style="list-style-type: none"> • Hamriyah Free Zone Authority (HFZA) - EHS Department 	HFZA indicated that they have no major environmental concerns relating to the Project. Environmental assessment measures to be undertaken including air quality modelling and marine ecology survey were discussed
2018-08-13	<ul style="list-style-type: none"> • Hamriyah Municipality 	Hamriyah Municipality indicated that there are no potential negative impact associated with the project given the design of the project and assessment undertaken. Although the Municipality believes that there will be no impacts on the fishermen community of Hamriyah, upon our request the Municipality is currently consulting the Fishermen Co-op Society of Hamriyah in order to identify any concerns associated with the Project

² The CLO does not have to be externally hired nor must their responsibilities fully consist of community liaison. The CLO can be an existing employee who, in addition to their other responsibilities, takes on the responsibilities of a CLO.

Date	Stakeholders	Summary of key issues discussed
2018-09-25/26	<ul style="list-style-type: none"> Japan Bank for International Cooperation (JBIC) Nippon Export and Investment Insurance (NEXI) Ajman Municipality Environment and Protected Areas Authority (EPAA) Sharjah Municipality 	Meetings with JBIC and NEXI and different governmental authorities were undertaken between 25-26/09/2018 in order for JBIC/NEXI to get better understanding of any environmental and social concerns associated with the development of the Project. Meetings with EPAA, Sharjah Municipality and Ajman Municipality were conducted, and no key issues were raised. In addition, meetings with JBIC/NEXI were undertaken during these two days in order to discuss their environmental and social concerns.
2018-10-03	<ul style="list-style-type: none"> Hamriyah Coop Society for Fishermen 	Meeting with Hamriyah Coop Society for Fishermen was undertaken where the project was described, and a copy of the scoping report was handed over for the Society review. The Society commented that there will be no issue as long as appropriate environmental assessment is undertaken. They have requested for a formal letter to be sent to them by the Project Company
2018-10-18	<ul style="list-style-type: none"> Hamriyah Coop Society for Fishermen 	A letter along with a copy of the executive summary and marine environment chapter of the ESIA study was issued to the Hamriyah Coop Society for Fishermen to give them additional details on the project and provide them an opportunity to voice their concerns. Any comments received will be considered within the final ESIA report and associated management plans

Source: Mott MacDonald

4.3 Stakeholder Engagement Programme

Table 3 below outlines the specific consultation and disclosure activities, their sequence and responsible parties. Specific timeframes within the construction phase will be updated following finalisation and confirmation of the construction schedule.

Table 3: Stakeholder Engagement Programme

Activity	Timeframe	Responsibility
1) ESIA Phase Engagement		
Scoping		
ESIA scoping meetings, introductory interviews and key informant interviews	April to August 2018	Project Developer
Disclosure of information about the Project	26/10/2018	Project Developer, JBIC and NEXI
Disclosure of SEP and ESIA Scoping Report	26/10/2018	Project Developer, JBIC and NEXI
Comments on SEP and Scoping Report	September 2018	Project Developer
ESIA		
Disclosure of ESIA and/or ESIA executive summary (non-technical summary)	TBD (upon establishing the PC website following financial close)	Project Developer through SEWA
Disclosure of ESIA report on JBIC and NEXI websites	26/10/2018	JBIC and NEXI
2) Construction Phase Engagement		
Ongoing grievance process	During the lifetime of construction phase	Project Developer
Ongoing identification of additional relevant stakeholders	During the lifetime of construction	Project Developer

Activity	Timeframe	Responsibility
Update Environmental and Social Management Plan (ESMP)	Prior to commencing construction and during the lifetime of construction phase	Project Developer
Update SEP	Prior to commencing construction and during the lifetime of construction phase	Project Developer
Annual Reporting	Quarterly or biannually according to requirements of lenders and EPAA	Project Developer
Consultation with relevant stakeholders including local residents, municipalities and SNOC	Ongoing during construction, annually at minimum	Project Developer through SEWA
3) Operation Phase Engagement		
Grievance logging, resolution and reporting	During the lifetime of operation phase	Main Contractor (TBC)
Update SEP	Prior to commencing operation and through the lifetime of project	Main Contractor (TBC)
Annual Reporting	Biannual in the first two years of operation then annual	Main Contractor (TBC)

5 Public Grievance Mechanism

5.1 Overview

The public grievance mechanism is based on the principles of being legitimate, accessible, predictable, equitable, transparent, rights compatible, continuous learning, and dialogue based. The grievance mechanism can present lessons learned and identify ways for continuous improvement.

A grievance can be defined as an actual or perceived problem that might give grounds for complaint. As a general policy, the Project Company and its main contractor will work proactively towards preventing grievances through the implementation of impact mitigation measures (as identified by the ESIA and ESMMP) and community liaison.

Anyone will be able to submit a grievance to the Project if they believe a practice is having a detrimental impact on the community, the environment, or their quality of life. They may also submit comments and suggestions. Any type of issue can be raised. The Project will aim to protect a person's confidentiality and will guarantee anonymity in reporting. Individuals will be asked permission to disclose their identity.

The sections below consider the Project's grievance resolution process.

5.2 Grievance Reporting and Resolution

The main steps for handling grievances are: receive, categorise, acknowledge, investigate, respond, allow for recourse/appeal and follow-up, and close out.

Grievances will be recorded in a formal logging system for which the CLO will be responsible. The grievance log will be separate from a stakeholder log which details interactions with communities and stakeholders. People may register grievances using the form in Appendix A and contacting the CLO. Contact details for the CLO will be included in appropriate project communication materials such as the non-technical summaries.

The CLO will classify grievances according to Table 4. Where investigations are required Project staff and outside authorities as appropriate will assist with the process. The CLO will collaborate with the Project Company or the main contractor's management, to identify an appropriate investigation team with the correct skills to review the issue raised. The investigation will also aim to identify whether the incident leading to the grievance is a singular occurrence or likely to reoccur. Identifying and implementing activities, procedures, equipment and training to address and prevent reoccurrence will be part of the investigation activities.

Table 4: Grievance Classification Criteria

Classification	Risk Level (to health, safety or environment)	Response
Low	No or low	The grievance may not be related to Project performance, it may be a comment, or a request. CLO will acknowledge complaint within 7 days and conduct an investigation if required. The CLO will document findings and provide a response within 30 days of receiving. Response is likely to have minimal cost in addition to time spent on addressing the issue.
Medium	Possible risk and likely a one-off event	CLO will acknowledge complaint within 7 days. The CLO and an appropriate investigation team will conduct investigation. The Site Manager or Occupational Health and Safety Manager may decide to stop work during the investigation to allow the corrective preventive actions to be determined. The CLO will provide a response within 30 days of receiving complaint. The corrective action is likely to be straight forward involving changing a piece of equipment or procedure which does not take long or have substantial cost implications to implement.
High	Probable risk and could reoccur	CLO will acknowledge the complaint within 7 days and will get the Project Manager to organise a major investigation team for prompt investigation and resolution. Work may be stopped in the affected area. The CLO will provide a response within 30 days of receiving complaint. If more time is needed to complete the investigation this will be communicated to complainant within 30 days of receiving complaint. As necessary the response will include a press release. The corrective action may be complex or sensitive involving changing equipment or a procedure which requires training of staff and has substantial cost implications.

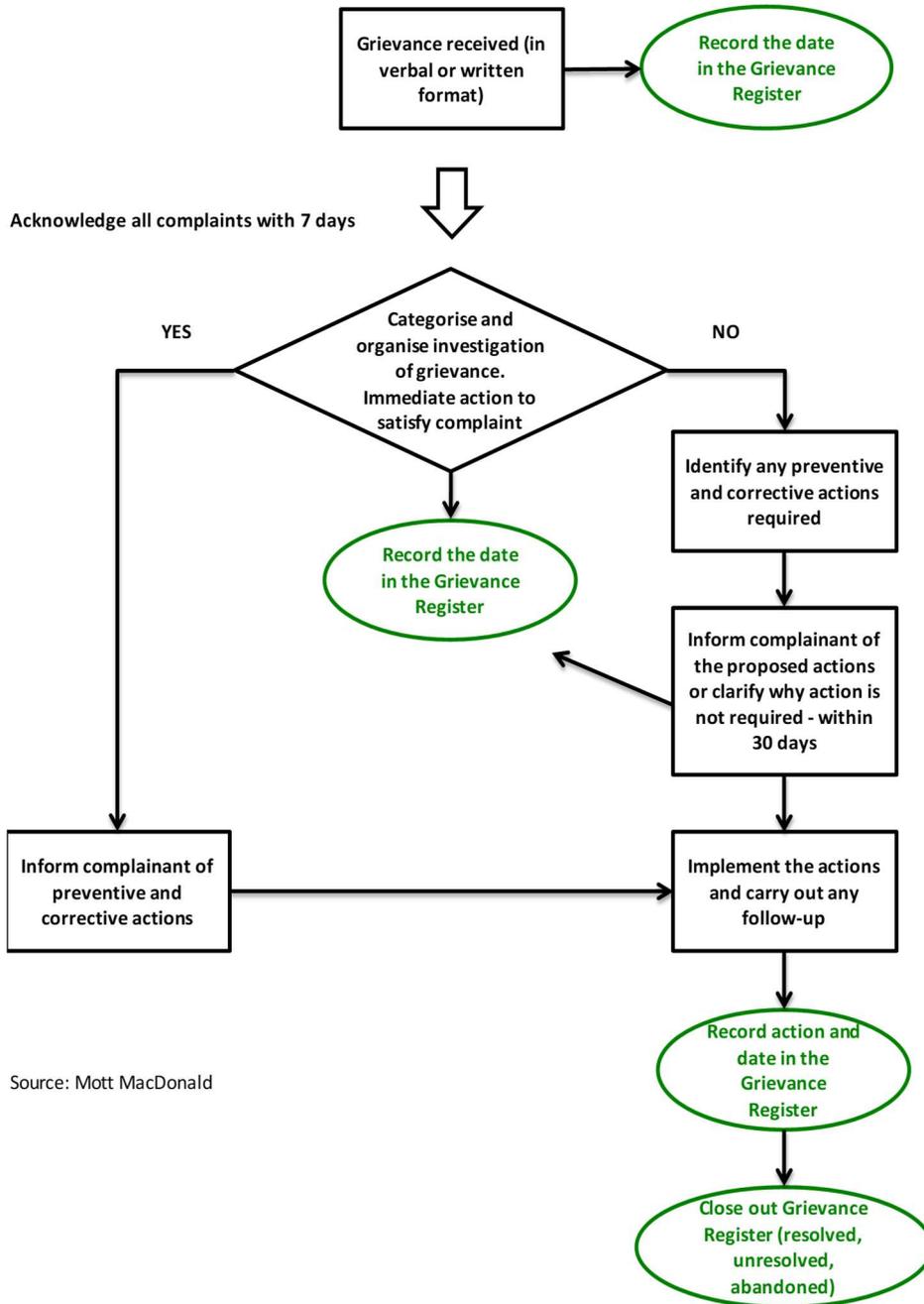
The CLO will explain to the complainant in writing (or where literacy is an issue orally) the grievance review process, the investigation results, any changes to activities that will be undertaken to address the grievance, and how the issue is being managed to meet appropriate environmental and social management systems. In some cases, it will be appropriate for the CLO to follow up at a later date to see if the person or organisation is satisfied with the resolution or remedial actions. The grievance will be closed out in the register as:

- Resolved - the resolution has been communicated, agreed and/or implemented.
- Unresolved - the complainant did not accept the proposed resolution and has appealed to other entities for resolution.
- Abandoned - the complainant is no longer contactable and efforts to trace whereabouts have been unsuccessful.

The CLO will summarise grievances weekly or monthly during construction and bi-annually during operation removing identification information to protect the confidentiality of the complainant and guaranteeing anonymity. The procedure will be at no cost and without retribution to the complainant and stakeholders. The procedure for processing grievances is depicted in Figure 2.

Figure 2: Flowchart for processing grievances

Flowchart for Processing Grievances



Source: Mott MacDonald

During the construction phase, the main contractor will nominate a staff member as the CLO and point of contact for grievances. Grievances should be sent to the contacts identified in section 6, where possible by using the form provided in Appendix A.

6 Company Contact information

6.1 Community Liaison Officer (CLO)

All general comments, queries and grievances can be submitted to the CLO or voiced through the dedicated grievance telephone number – the below details will be updated once the CLO has been appointed:

- Name: TBC
- Company: TBC
- Postal Address: TBC
- E-mail address: TBC
- Project Website: TBC
- Dedicated Grievance Telephone Number: TBC

7 Reporting

Results and feedback from public consultation and information disclosure during the ESIA process will be reported on in the updated SEP.

Consultation and stakeholder engagement will need to continue past the ESIA study period into the construction and operation phases. The Project Company will be responsible for ensuring good relationships with local communities and the Project Company will be required to report on community engagement and grievance aspects as well as social and environmental monitoring results. During operation, the Project Company will maintain relationships with local stakeholders and be responsible for reporting on project performance.

This SEP will be revised by the Consortium's CLO and Project Manager every six months throughout the course of the construction phase, and bi-annually by the Project's CLO once the Project is operational, in order to assess whether:

- The type of consultation and disclosure activities are appropriate for the different stakeholders;
- The frequency of consultation activities is sufficient;
- Grievances are being adequately dealt with; and
- The stakeholder list remains appropriate and whether engagement should cease or be extended to any stakeholders.

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A. Grievance Registration Form

Full Name	
Contact Information	By Post: Please provide mailing address
Please identify how you wish to be contacted (mail, telephone, e-mail)	By telephone: By e-mail:
Preferred language of communication?	English Arabic.....Other.....
Description of incident or grievance (What happened? Where did it happen? Who did it happen to? What is the result of the problem?):	
Date of incident/grievance	
	One time incident/grievance (date _____) Happened more than once (how many times? ____) On-going (currently experiencing problem)
What would you like to see to resolve this problem?	
Internal Use Only Grievance received by: Date: Reference number:	

B. Grievance Log Template

Table 5: Grievance log template

Number	Date received	Name/ Anonymous	Type of grievance	Classification	Brief description	Person responsible for follow-up	Actions taken	Date resolved	Action taken to avoid future similar grievances

Source: Mott MacDonald

