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Scatec 200MW Wind Farm in Egypt

Stakeholder Engagement Plan (SEP) – Deliverable D2

8th January 2025

REV 1

EcoConServ Environmental Solutions

12 El-Saleh Ayoub St., Zamalek, Cairo11211, Egypt

Tel: +20227359078 /27364818

Fax: + 20227365397

E-mail: genena@ecoconserv.com

URL: www.ecoconserv.com

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Prepared by:

EcoConServ Environmental Solutions
 12 El-Saleh Ayoub St., Zamalek Cairo, Egypt, 112111
 Tel: + (2 02) 2735 9078 / 2736 4818
 Fax: + (20 2) 2736 5397
 E-mail: genena@ecoconserv.com

ECO Consult
 Jude Center, Salem Al-Hindawi Street, Shmeisani, Amman, Jordan
 Tel: 962 6 569 9769
 Fax: 962 6 5697264
 E-mail: info@ecoconsult.jo

Prepared for:

RCREEE - Regional Centre for Renewable Energies and Energy Efficiency
 Hydro Power Building, Floor 7
 Block 11, Piece 15, Melsa District
 Ard el Golf, Nasr City, Cairo
 Arab Republic of Egypt

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1. INTRODUCTION

The Government of Egypt (GoE) issued the Renewable Energy Law (Decree Law 203/2014) to support the creation of a favorable economic environment for a significant increase in renewable energy investment in the country. The law sets the legal basis for the Build, Own and Operate (BOO) scheme to be implemented. Through the BOO mechanism, the Egyptian Electricity Transmission Company (EETC) invites private investors to submit their offers for solar and wind development projects, for specific capacities and the award will be made to that bidder with the lowest Kilowatt Hour (kWh) price. In addition, the GoE (through the New and Renewable Energy Authority (NREA)) provides the land for the investors.

Through the BOO mechanism, Scatec (hereafter referred to as ‘the Developer’), has been selected for the development of a 200-Megawatt (MW) Wind Power Project Wind Power facility in Ras Ghareb District of the Red Sea Governorate (hereafter referred to as ‘the Project’).

This document constitutes a Stakeholder Engagement Plan (SEP) to be implemented by the Developer throughout the planning, construction, operation and decommissioning’ phase for the Project. The SEP outlines a systematic approach to stakeholder engagement that will help the Developer build and maintain over time a constructive relationship with their stakeholders, particularly the locally affected communities. The SEP is a live document which will be updated throughout the Project construction, operation, and implementation.

The Project welcomes suggestions for improvement of this SEP. Suggestions can be submitted via the contact information for the Developer at the end of this document (Chapter ‘6’).

This SEP includes the following:

- Chapter 1 – provide a background and introduction on the Project and SEP;
- Chapter 2 – Project Description: provides a summary of the Project location, main Project components, Project schedule and job opportunities for the construction and operation phase. Finally, the Chapter also provided an overview of E&S risks and opportunities;
- Chapter 3 – Regulatory Context: highlights the main requirements that are relevant for stakeholder engagement to the Project to include Egyptian regulations and international best practice requirements;
- Chapter 4 – Identification of Stakeholders: identifies all relevant stakeholders for the construction and operation phase of the Project at all geographic levels to include national, regional and local levels as well as communities within the area of influence of the Project;
- Chapter 5 – Summary of Past Stakeholder Engagement Activities: provides a summary of past stakeholder engagement activities undertaken for the Project during the planning and design phase of the Project;
- Chapter 6 – Stakeholder Engagement Strategy and Plan: identifies an engagement strategy for each stakeholder group to include objective for engagement, communication methods and tools, timeframe, and responsibilities. Chapter also provides contact details of the Developer for communication with all relevant stakeholders of the Project;
- Chapter 7 – Grievance Mechanism: identifies a mechanism for managing and handling any concerns or complaints related to the Project during the construction and operation phase. This includes a mechanism for stakeholder and communities and another for workers.
- Chapter 8 – Monitoring and Reporting: identifies the key monitoring and reporting requirements that are applicable for the implementation of the plan
- Chapter 9 – Roles and Responsibilities: identifies the roles and responsibilities for the Developer and other involved entities in implementation of the plan.

2. PROJECT DESCRIPTION

2.1 Project Location

The Project site is located within the Red Sea Governorate, approximately 290km southeast of the capital city of Cairo (Figure 1). More specifically, the Project site is located within the Ras Ghareb City (or District) and therefore administratively is under the Ras Ghareb City Council.

The closest official (under Ras Ghareb District) community settlement to the Project site includes Wadi Dara Settlement (located less than 1km to the south) and Ras Ghareb town (located around 35km to the north) – refer to Figure 2 below. The Project has a total area of 38km² area that has been allocated to the Developer by NREA for the development of this Project. Moreover, there is an unofficial community settlement known as Ras Shukeir that is located around 8km to the northeast of the Project site. This settlement is used by petroleum companies in the area as housing/accommodation units, offices, and also includes some petroleum facilities.

In addition, it is important to note that the Project area is part of a larger 700km² area (hereafter referred to as 'NREA Area') that is owned by NREA for the purpose of wind farm development projects. NREA in turn allocates the land to private developers under land use usufruct agreements. Refer to below for the location of the NREA Area location in relation to the Project site.



Figure 1: Project Site in Relation to the Capital City of Egypt



Figure 2: Project Site

2.2 Project Components

Wind turbine technology relies on harvesting the kinetic energy in wind (i.e. movement of wind) and turning it into mechanical energy which in turn is used for electricity generation. The key components of the Project include the following:

- **Wind Turbines:** a typical wind turbine is presented in Figure 4 below. The specifications of the wind turbine is provided in the table below.

Table 1: Summary of Turbine Specifications

Type	Description
Turbine Manufacturer:	Envision
Generation Capacity:	8 MW
Hub-Height:	100 m
Rotor Diameter:	171 m
Tip Height:	185.5 m
Number of Turbines:	25

- **Supporting infrastructure and utility** elements for the Project which will include:

- Cables that will connect the turbines to an onsite substation
 - Substation that converts the output from the turbines to a voltage that is appropriate for connection with National Grid
 - Onsite building infrastructure that will include an administrative building (offices) and a warehouse for storage of equipment and machinery
 - Road network for ease of access of various project components throughout the site
- Associated facilities which will mainly include an Overhead Transmission Line (OHTL) that will connect from the substation onsite to the National Grid.

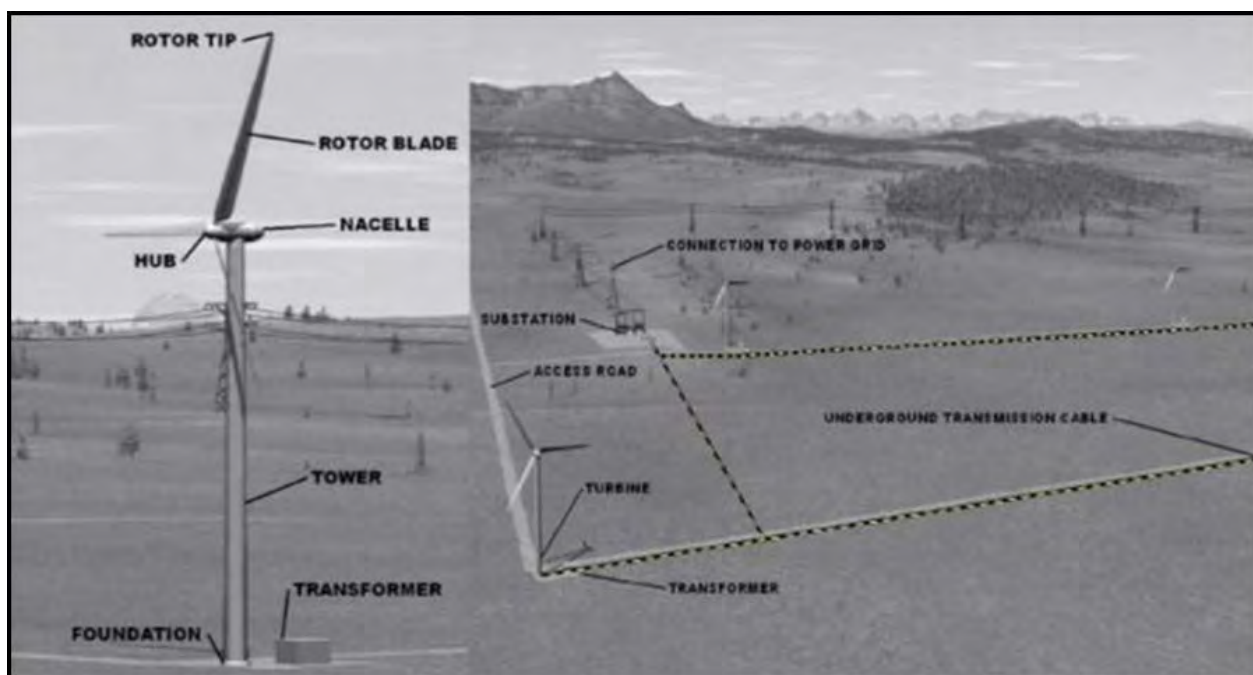


Figure 3: (a) Typical Structural Components of a Wind Turbine, (b) Typical Components of a Wind Farm
(Source: EHS Guidelines for Wind Energy, IFC)

The Project will result in crucial positive environmental and economic impacts on the strategic and national level given the current challenges the energy sector in Egypt is facing. Such positive impacts underpin rationale for the Project. These include the following:

- The Project allows for more sustainable development and shows the commitment of the Government of Egypt to realizing its Energy Strategy and meeting the set targets for renewable energy sources;
- The Project will contribute to increasing energy security through reliance on an indigenous, inexhaustible and mostly import-independent energy resource. The Project is expected to provide around 1,850-Gigawatt Hour (GWh) of electricity per year, which is enough to power more than 675,000 households in Egypt; and
- Generating electricity through wind power is relatively pollution-free during operation. Compared with the conventional way of producing electricity in Egypt, the clean energy produced is expected to reduce consumption of fossil fuels for electricity generation and will thus help in reducing greenhouse gas emissions as well as air pollutant emissions. The Project will likely displace more than 877,500 metric tons of CO₂ annually.

2.3 Project Phases

- Planning and Construction Phase: that will include: (i) preparation of the detailed design, (ii) transportation of components to the site, (iii) site preparation activities (land clearing, excavations, etc.), and (iv) installation of components.

- Operations Phase: that will include the normal daily operation of the wind farm and the undertaking of maintenance activities as required.
- Decommissioning Phase (to be determined): that will include the dismantling of the various Project components at the end of the lifetime.

2.4 Overview of Potential E&S Risks and Opportunities

The table below provides an overview of the potential E&S risks and opportunities that are expected throughout the key project phases.

Potential Risks and Opportunities during the Construction Phase

Attribute / Issue	Likely Impact – Planning and Construction Phase
Landscape and Visual	Visual and landscape impacts due to presence of elements typical of a construction site such as equipment and machinery.
Land Use ¹	The Project could conflict the formal assigned land uses set by the various governmental entities.
Geology, Hydrology and hydrogeology	Potential for flood risks on the Project area.
	Risk of soil and groundwater contamination during the various construction activities from improper housekeeping activities, spillage of hazardous material, random discharge of waste and wastewater.
Biodiversity	Improper management of construction activities could disturb/damage habitats and fauna within the Project site.
Archaeology	Improper management of construction activities could disturb/damage archaeological remains which could be buried in the ground (if any).
Air Quality and Noise	Construction activities will likely result in an increased level of dust, particulate matter and pollutant emissions
	Possible noise emissions to the environment from the construction activities which will likely include the use of machinery and equipment
Infrastructure and Utilities	Road Networks – if transportation activities of the various project components to the site are not properly managed beforehand, they could entail risk of damage to the existing roads and could be of public safety concerns to other users on the road. In addition, if planning activities are not well managed it could damage/disturb existing onsite road networks.
	Water Resources – water requirements of the Project could entail constraints on the existing resources and users.
	Waste Utilities – it is important to ensure that existing utilities would be able to handle the amount of waste, wastewater and hazardous generated from the Project during the construction phase.
	Aviation, Telecommunication, and TV & Radio Links – Improper planning and site selection of the Project could impact aircraft safety and/or could potentially interfere with certain electromagnetic transmissions associated with air transport, telecommunications, and radio/television systems in the area.
Occupational Health and Safety	There will be some generic risks to workers health and safety from working on construction sites, as it increases the risk of injury or death due to accidents.
Public Health and Safety	Public access of unauthorized personnel to the various Project components (turbines, substation) could result in various public safety hazards.
	Worker influx could result in certain community health, safety and security impacts to include risk of diseases, inappropriate conduct by workers towards locals, increase in social vices, etc.
	Inappropriate conduct of security personnel towards local communities could result in resentment, distrust and escalation of events
Socio-economic Development	The Project is expected at a minimum to provide job opportunities for local communities. This, to some extent, could contribute to enhancing the living environment for its inhabitants, elevate their standards of living, and bring social and economic prosperity to local communities. Around 450-500 job opportunities are expected at peak

¹ Bedouin communities have traditionally been assigned customary land rights in the area. If such rights are not acknowledged and/or improperly managed by the Project, this could potentially result in conflicts and disputes

	<p>during the construction phase. This will mainly include skilled job opportunities (engineers, technicians, consultants, surveyors, etc.) and unskilled job opportunities (mainly laborers but will also include a few security personnel).</p> <p>Based on preliminary assessments and stakeholder consultations, it is recommended setting the following targets:</p> <p>Construction Phase: The Project aims to allocate at least 30-40% of employment opportunities to residents from local communities, prioritizing unskilled and semi-skilled labor roles.</p> <p>Operation Phase: For long-term operational roles, the Project is committed to achieving an employment target of 20-25% for local community members, with a focus on technical and administrative positions supported by tailored training programs.</p> <p>These percentages are indicative and will be refined as the Project progresses and based on further dialogue with local stakeholders and contractors.</p>
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Potential Risks and Opportunities during the Operation Phase

Attribute / Issue	Likely Impact – Operation Phase
Landscape and Visual	Visual impacts concern the turbines themselves (e.g., color, height, and number of turbines) relating to their interaction with the character of the surrounding landscape.
Geology, Hydrology and Hydrogeology	Risk of soil and groundwater contamination during the various operational activities from improper housekeeping activities, spillage of hazardous material, random discharge of waste and wastewater.
Avifauna (Birds)	Wind turbines are associated with impacts on birds from risks of strikes and collision on both migratory and resident soaring birds. Such impacts depend on several factors but could affect the population levels of certain species especially those with international/national critical conservation status.
Bats	The potential impacts from the Project during operation are mainly related to risk of bat strikes and collisions with rotors of the operating wind turbines.
Infrastructure and Utilities	Water Resources – water requirements of the Project could entail constraints on the existing resources and users.
	Waste Utilities – it is important to ensure that existing utilities would be able to handle the amount of waste, wastewater and hazardous generated from the Project during the construction phase.
Occupational Health and Safety	There will be some risks to workers health and safety during the operation and maintenance activities of the Project.
Public Health and Safety	Operating wind turbines will produce noise from mechanical and aerodynamic effects. This could be a source of disturbance and nuisance to the receptors and could create a disturbing indoor environment.
	Operating wind turbines will produce shadow flicker which could be a source of disturbance and nuisance to the receptors and could create a disturbing indoor environment.
	Public access of unauthorized personnel to the various Project components (turbines, substation) could result in various public safety hazards.
	Inappropriate conduct of security personnel towards local communities could result in resentment, distrust and escalation of events
	Blade or tower glint can impact sensitive receptors as the reflection of sunlight off the rotor blade may be angled toward nearby receptors.
	Failure in rotor blade can result in the ‘throwing’ of the blade. Although overall risk of such events is extremely low, it could affect the public safety of nearby receptors.

Socio-economic Development	The Project is expected at a minimum to provide job opportunities for local communities. This, to some extent, could contribute to enhancing the living environment for its inhabitants, elevate their standards of living, and bring social and economic prosperity to local communities. Around 25 job opportunities are expected during the operation phase for a duration of 25 years. This will include skilled job opportunities (such as engineers, technicians, administrative employees, etc.) and unskilled job opportunities (such as security personnel, drivers, etc.).
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3. REGULATORY CONTEXT

3.1 Egyptian Legislation Requirements

Stakeholder consultation and engagement under the Egyptian requirements, is primarily linked to the Environmental and Social Impact Assessment (ESIA) study as stipulated in the “Law of Environment No. 4 of 1994 and its amendments in Law No. 9 of 2009”. According to the last updated executive regulation and the ministerial decree No. 26 of 2016, the ESIA system classifies projects into four categories based on different levels of ESIA requirements according to severity of possible impacts and location of the establishment and its proximity to residential settlements.

In specific, wind farm development projects in general are categorized as “Category C” (projects which require a comprehensive ESIA study) and which require consultations under two (2) phases: scoping phase and public disclosure consultation.

The scoping should include targeted stakeholder consultations with key stakeholders as relevant to the Project, while the public disclosure consultation must include the following entities:

- Representatives of the Egyptian Environmental Affairs Agency (EEAA)
- Related governmental authorities
- Representatives of the Governorate and local units where the project is located
- Affected groups including local businesses and communities
- Non-governmental Organization (NGOs) and civil society groups

The EEAA guidelines methodology identifies the following articles covering the guidelines on conducting the public consultation as part of the ESIA study are as follows:

- Paragraph 6.4.3.1 Scope of Public Consultation
- Paragraph 6.4.3.2 Methodology of Public Consultation
- Paragraph 6.4.3.3 Documentation of the Consultation Results
- Paragraph 7 Requirement and Scope of the Public Disclosure

3.2 Lender E&S Requirements

The Developer will be seeking financing for the Project from International Financial Institutions (IFIs). Therefore, the Developer wishes to design and manage the Project in accordance with good international industry practice and standards. This SEP meets international best practice requirements to include the relevant E&S requirements of IFIs.

International Finance Corporation (IFC)

The IFC Policy on Social and Environmental Sustainability, including the IFC Performance Standards (PS) have become the de facto international environmental and social performance benchmark for project financing. The IFC Performance Standards form part of their Sustainability Framework, where “IFC Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts” (IFC, 2012) sets out the following recommendations for stakeholder engagement:

- Stakeholder Engagement is an on-going process that may involve, in varying degrees, the following elements: stakeholder analysis & planning, disclosure & dissemination of information, consultation & participation, grievance mechanism, and on-going reporting to Affected Communities.
- Project stakeholders are those persons or groups who:

- are directly and/or indirectly affected by the project (or the company's operations)
- have "interests" in the project or parent company that determine them as stakeholders
- have the potential to influence project outcomes or company operations
- A Stakeholder Engagement Plan (SEP) that is scaled to the project risks and impacts and is developed and tailored to the characteristics and interests of the Affected Communities and will be implemented accordingly.
- Affected Communities will be provided with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.
- When Affected Communities are subject to identified risks and adverse impacts from a project, a process of consultation will be undertaken 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' or 'meaningful consultation' is further explained in Para 30 of PS1.
- The extent and degree of engagement should be commensurate with the project's risks and adverse impacts and concerns raised by Affected Communities.
- The consultation process will be tailored to language preferences of Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups.
- For projects with potentially significant adverse impacts, the client will conduct an Informed Consultation and Participation (ICP) process that will result in the Affected Communities' informed participation.
- A grievance mechanism will be established to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance.

European Bank for Reconstruction and Development (EBRD) Performance Requirements (PR)

The SEP will also follow the requirements of the EBRD in relation to the stakeholder engagement process and activities. EBRD "PR10: Information Disclosure and Stakeholder Engagement" sets out the following requirements of stakeholder engagement during project preparation:

- A Stakeholder Engagement Plan (SEP) must be developed and implemented for projects that are likely to - have adverse environmental or social impacts and issues, tailored to take into account the main characteristics and interests of the affected parties and other interested parties.
- The first step in successful stakeholder engagement is for the client to identify the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project ("affected parties"), or (ii) may have an interest in the project ("other interested parties"). Resources for public information and consultation should focus on affected parties, in the first instance.
- As part of the stakeholder identification process, the client will identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. The client will also identify how stakeholders may be affected and the extent of the potential (actual or perceived) impacts. Where impacts are perceived, additional communication may be required to provide information and reassurance of the assessed level of impacts. An adequate level of detail must be included in the stakeholder identification and analysis so as to enable the Bank to determine the level of communication that is appropriate for the project under consideration. Employees are always considered stakeholders.²
- The Client will inform the EBRD how communication with the identified stakeholders will be handled throughout project preparation and implementation, including the type of grievance procedure envisaged.

² Good international practice among IFIs dictates that the entire workforce on a project - particularly during the construction phase, for example all workers employed by the EPC contractor and its subcontractors - is considered a key stakeholder group.*

4. IDENTIFICATION OF STAKEHOLDERS

This chapter includes the identification of stakeholders that are relevant to the Project and provides a stakeholder mapping as well.

4.1 Stakeholder Identification

In order to design and engagement process with stakeholders, several stakeholder groups that may be interested and/or affected by the Project development and implementation have been identified. There are various social groups that have an interest in the Project on different levels. These may be described as:

1. People and groups who will be directly or indirectly affected by the project (such as local communities);
2. People and groups who may participate in the implementation of the project (such as investors and lenders);
3. People and groups who are not affected by the project development per se may but have a possibility to influence and make decisions on implementation of the Project (such as Ministries or regulatory agencies).

The main categories of stakeholders identified so far are listed in the table below. This document is a living document and will need to be updated and modified during Project development and as a result of its implementation with the various identified stakeholders throughout as identified below.

Vulnerable Groups

The stakeholder list also includes vulnerable groups and is defined as groups that are expected to be disproportionately affected by project impacts due to their race, color, sex, language, religion, political opinion, national or social origin, gender, ethnicity, culture, physical or mental disability, and other. Vulnerable groups are project-specific and depend on a range of issues which must be understood such as project location, socio-economic and demographic context, as well as the nature of the development and type of impacts anticipated.

The vulnerable groups within this context were identified to include:

- Women groups of the local community. Cultural norms in Egypt and within the local communities, in specific, could limit their participation in decision-making in general as well as their employment opportunities as opposed to their male counterparts.
- Disabled Groups: are considered vulnerable groups mainly due to physical disability which could limit their access to information on the Project.
- Elderly Groups: are considered vulnerable groups mainly due to age limitations which could limit their access to information on the Project.
- Casual workers and day labourers: are considered vulnerable groups mainly due to a lack of labour contracts - typically not offered to these categories - any health & safety issues, violation of worker rights, or substandard working conditions will affect these categories disproportionately.

Given the nature and location of the Project there are no additional groups considered as vulnerable that would require special consideration throughout the consultation process.

Table 2: Identified Groups of Stakeholders

Level of Stakeholder interest in/involvement to the Project
1. Stakeholders who may be directly or indirectly affected by the Project
<p>Residents of the nearby villages of the Project to include <u>Wadi Dara Settlement</u> and <u>Ras Gharib Town</u> which are administratively under Red Sea Governorate and Ras Ghareb City (or District). For the above, this includes the following groups within the local communities in specific:</p> <ul style="list-style-type: none"> ▪ <u>Community Members</u>: local community members have a vested interest in the project due to mainly potential for job opportunities. In addition, local community members could be impacted by other potential negative

<p>impacts (e.g. worker influx, noise & shadow flicker, etc.). Such impacts are discussed and identified within the ESIA.</p> <ul style="list-style-type: none"> ▪ <u>Community Leaders</u>: They are socially active members and known figureheads for local community members, who may or may not hold government positions. Community leaders involved in the project are the heads of affected communities ▪ <u>Business Community (local subcontractors)</u>: such groups have a vested interest in the project due to mainly potential for procurement opportunities such as subcontracting works (e.g. civil works, provision of food and amenities, etc.)
<p><u>Women groups</u> within local communities, such groups have a vested interest in the project due to mainly potential for job opportunities. In addition, such groups could be impacted by other potential negative impacts (e.g. worker influx, Gender Based Violence and Harassment (GBVH), etc.) Such impacts are discussed and identified within the ESIA</p>
<p><u>Bedouin Groups</u>: the key Bedouin group known in the area are the Ma'aza tribe and specifically the Hammadin family of the Ma'aza tribe. Although they do not reside within the Project site, they hold customary ownership/control of the Project site and surrounding lands which is known as 'Urfa Contracts' and 'Ghafr System'. Such tribes would be helpful in providing security and protection and could also have a vested interest in employment and procurement opportunities (such as security guards, provision of raw materials, provision of food supplies and water to the workers, etc.).</p>
<p><u>Residents of Ras Shukeir</u> that is located around 8km to the northeast of the Project site. This settlement is used by petroleum companies in the area as housing/accommodation units, offices, and also includes some petroleum facilities. No key impacts are anticipated on Ras Shukeir and they could have a vested interest in obtaining updated information on the Project in general.</p>
<p><u>The Project workforce - including those of (sub-) contractors, and those workers that are hired locally as 'casual workers' or 'day labourers'.</u> Especially as local workers are a direct interface between the Project and the communities of Ras Ghareb, Wadi Dara, and the Bedouin.</p>
<p>2. Stakeholders who may Participate in Implementation of the Project</p>
<p><u>Investor/Lender</u>: entities that will provide financing for the Project development. In particular, they have interest in ensuring that the Project is developed and implemented in accordance with their E&S requirements and standards, and will monitor the compliance of the Project against such requirements.</p>
<p><u>Workers</u>: This includes all Project workforce to include but not limited to workers from Developer team, workers from EPC Contractor, Project Operator and any involved subcontractor(s).</p>
<p>3. Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project</p>
<p>Central Government</p>
<p><u>The Egyptian Environmental Affairs Agency (EEAA)</u>: state body regulating environmental management. For this Project, this will include review and approval of ESIA, issuance of environmental permit, monitoring implementation of Environmental and Social Management Plan (ESMP) and compliance with other conditions, as applicable.</p>
<p><u>Egyptian Electricity Transmission Company (EETC)</u>: off-taker and entity that signed the Power Purchase Agreement (PPA) with Developer. They will also be responsible for designing, building, and operating the associated interconnection facilities (i.e. Overhead Transmission Line).</p>
<p><u>New & Renewable Energy Authority (NREA)</u>: national focal point for expanding efforts to develop renewable energy technologies to Egypt in coordination with other concerned national institutions. In addition, NREA also the entity responsible for allocation of the land for the development of the Project.</p>
<p><u>Ministry of Labor</u>: official governmental entity responsible for setting labor policies and legislations as well as ensuring protection of labor rights and working conditions. Has a vested interest in ensuring that labor rights and proper working condition are maintained for the Project in accordance with Egyptian laws and regulations.</p>
<p><u>Ministry of Civil Aviation</u>: Official governmental entity responsible for civil aviation management in Egypt and responsible for issuing permits for projects with specific height requirements.</p>

<u>Armed Forces Operations Authority</u> : Official governmental entity responsible for military aviation management in Egypt and responsible for issuing permits for projects with specific height requirements.
<u>Ministry of Tourism and Archeology</u> The ministry is the entity responsible for the preservation and protection of the heritage and ancient history of Egypt, under which operates all inspector offices in the governorates.
<u>Ministry of Interior</u> : The Ministry is responsible for national and local security, as well as approving emergency response and firefighting plans for establishments/projects.
<u>General Petroleum Company</u> : a national State-owned company engaged in exploration, production, and development of hydrocarbons, is responsible for the management of oil and gas exploration and production activities on behalf of the State. It is one of the subsidiary companies affiliated to the Ministry of Petroleum. It has the right of concession for petroleum exploration in some parts of the Project area and adjacent areas and represents the main investment activity in the Project area.
<u>National Telecom Regulatory Authority</u> : Responsible for overall regulation and administration of the telecommunication sector in Egypt including interface with telecommunication companies and their infrastructure elements such as broadcasting towers. Given that project could impact such infrastructure elements, approvals are required.
<u>Telecommunication Operators</u> : Could own and operate telecommunication infrastructure within the area. This includes mainly Orange, Etisalat and Vodafone. Given that project could impact such infrastructure elements, approvals are required.
<u>Radio and Television Union</u> : Responsible for overall regulation and administration of the radio and television sector in Egypt including infrastructure elements. Given that project could impact such infrastructure elements, approvals are required.
Local Governmental Agencies
<p><u>Red Sea Governorate</u>: Governorate's main role is supporting the Project in all aspects as required to include providing required permissions. They key departments of the Governorate that are related to the Project include the following:</p> <ul style="list-style-type: none"> - <u>Environmental Administration</u> that is responsible for monitoring compliance to environmental requirements along with EEAA; - <u>Labor Office</u> that is responsible for overall management of the labor force in Red Sea Governorate, monitoring recruitment by development projects within the Governorate, monitor labor grievances and other; - <u>Roads Directorate</u>: responsible for services and development of external roads in the governorate and issuing permits for any construction work on the external roads - <u>Public Health Directorate</u>: provide the health services and facilities to the local districts and ensure overall local community health and safety
<u>Ras Gharib Local City Council</u> : main role is supporting the Project in all aspects as required to include providing required permissions. In addition, the Council is also responsible for supervision and follow-up for monitoring compliance to environmental requirements along with EEAA and Red Sea Governorate, and also has overall responsibility for solid waste management and disposal within their area of influence.
<u>Directorate of Social Solidarity Ras Gharib</u> : official governmental entity that acts as the overall management, organization and registration of local community associations, foundations and NGOs. They could have a vested interest in obtaining updates on employment and procurement opportunities provided by the Developer as well as any social responsibility programs.
<u>Red Sea Water and Wastewater Company</u> : official entity that is responsible for water and wastewater management within the Governorate. In addition, it will be the entity that will be responsible for providing the Project's requirements of water as well as disposal of wastewater.
<u>Red Sea Governorate Antiquities Inspector Offices</u> : Official governmental entity representing the Ministry of Antiquities within the Red Sea Governorate. They will be responsible for protection and management of archaeology

and cultural heritage resources in the area as well as implementation of chance find procedures by development projects.

Non-Governmental Organizations (NGOs) and Other Organizations

NGOs are Organizations with direct interest in the Project, and which may have useful data or insight into local issues of relevance to the Project. These organizations can also influence the views of others regarding the Project, both nationally and international and in general NGOs are responsible for sharing information with the community. The key NGOs active within the area are summarized below.

NGOs/ CBOs	Scope
Orban El-Saharaa	Social Development
Association for the Conservation of the Environment in Red Sea (HEPCA)	Environmental protection
Red Sea Ecotourism	Social and cultural services
Environmental protection in the Red Sea	Environmental protection
Ababdeh Sons Association in Ras Ghareb	Community Development
Resala Association	Social and family services
Firdous Association	Social and family services
Egyptian Red Crescent	Community Development

Nature Conservation Egypt (NCE): this is considered one of the most important and key NGOs in Egypt that is involved in biodiversity protection and conservation. NCE is also the Egyptian partner of the Bird Life International. They have a vested interest in the impacts of the Project on biodiversity in general and avifauna in particular and they key mitigation and monitoring programs that will be implemented.

Education providers (in particular technical / vocational training institutes): Provides knowledge and skills required for various occupations, including renewables and solar power in specific that is delivered through formal, non-formal and informal learning processes. The education curriculum in undergraduate, postgraduate, or Technical and Vocational Education and Training (TVET) could be reviewed and revised to match the market and workforce requirements.

Media (Newspaper, Television, Internet): They could disclose potential information and updates about the Project.

Regional Center for Renewable Energy and Energy Efficiency (RCREEE): responsible for managing certain aspects of the overall development process on behalf of the Developer. This includes in specific the overall management of the ESIA process with the Consultant. In addition, during the operation phase, RCREEE will be responsible in particular for the implementation of the Active Turbine Management Plan (ATMP).

4.2 Stakeholder Mapping

Further to the above, a preliminary stakeholder analysis is undertaken below to clarify stakeholders' interest in the Project and their ability to influence the Project's development. Accordingly, a priority contact list is identified.

High rating for priority contact list indicates importance of continuous and regular consultation and engagement. On the other hand, medium rating for priority contact list does not reduce the importance of the entity as a stakeholder but indicates that their engagement is required at specific stages or milestones of the Project (i.e. when the involvement of these entities is triggered for a specific purpose such as obtaining a specific service).

Project stakeholders are subsequently mapped in 'Table 3: Preliminary Stakeholder Analysis and priority Contact List for the Project' based on below scoring method:

Level of Impact

- High = 3
- Medium = 2
- Low = 1

Level of interest

- High = 3
- Medium = 2
- Low = 1

Ability to influence

- High = 3
- Medium = 2
- Low = 1

Based on the above the priority is determined based on adding level of interest and ability to influence as follows

- High = 8 or 9
- Medium = 6 – 8
- Low = 3 – 5

#	Stakeholder Group	Level of Impact			Level of Interest			Ability to Influence			Priority	
		Low	Med	High	Low	Med	High	Low	Med	High	Total	Level

Table 3: Preliminary Stakeholder Analysis and Priority Contact List for the Project

#	Stakeholder Group	Level of Interest			Ability to Influence			Priority		
		Low	Medium	High	Low	Medium	High	Low	Medium	High
1.	Stakeholders who may be directly or indirectly affected by the Project									
	Nearby local community from Ras Ghareb including women groups			√			√			√
	Bedouin groups in the general area where the Project is located			√			√			√
	<u>Residents of Ras Shukeir</u>			√			√			√
	<u>The Project workforce - (sub-) contractors, 'casual workers' and 'day labourers'</u>			√			√			√
2.	Secondary Interested Parties/Stakeholders									
	IFIs and investors		√			√			√	
	Contractor (engineers and workers)			√			√			√
	National Government & Permitting Authorities									
	- Ministry of Environment – Egyptian Environmental Affairs Agency (EEAA)			√			√			√
	- Environmental Office within the Governorate			√		√			√	
	- Egyptian Electricity Transmission Company (EETC)		√			√			√	
	- New & Renewable Energy Authority (NREA)		√			√			√	
	- Ministry of Interior		√				√		√	

#	Stakeholder Group	Level of Interest			Ability to Influence			Priority		
		Low	Medium	High	Low	Medium	High	Low	Medium	High
	- General Petroleum Company		√		√				√	
	- Ministry of Civil Aviation		√				√		√	
	- Armed Forces Operations Authority		√				√		√	
	- National Telecom Regulatory Authority		√			√			√	
	- Telecommunication Operators		√			√			√	
	- Radio and Television Union		√			√			√	
	- Red Sea Governorate		√				√		√	
	- Ras Ghareb City Council		√			√			√	
	- Water and wastewater Company	√				√			√	
	- Public health directorate Red Sea Governorate	√			√			√		
	- Labor Office in Red Sea Governorate			√		√			√	
	- Red Sea Antiquities Inspector Office		√			√			√	
	- Roads Directorate in Red Sea Governorate	√			√			√		
	- Non-governmental Organizations (NGOs) and Community Based Organizations (CBOs)			√		√			√	
	- Education providers (in particular technical / vocational training institutes)		√			√			√	
	- Media: Newspaper, Television, Internet		√			√			√	
	- Other community members at the national level	√			√			√		

[illegible]

5. SUMMARY OF PAST STAKEHOLDER ENGAGEMENT ACTIVITIES

The table below provides a summary of all stakeholders previously consulted and engaged throughout the project – primarily as part of the ESIA being conducted for the project site in April-May 2022 and currently under preparation. The consultant conducted round of consultation with various stakeholders in 2022, the results of these activities were reviewed, and a second round of consultation was conducted in October-November 2024 to provide updates on the developer's approach to the project site.

The table provides a summary of the stakeholder groups engaged and the main objective and outcome.

The objective of such consultations was to:

- Introduce project (rationale, objective, location, key components, etc.)
- Explain and discuss overall methodology for ESIA study
- Explain and discuss key anticipated impacts as relevant
- Identify and determine additional requirements or key issues of concern to be taken into account for the ESIA study

Throughout the consultations a handout was prepared and distributed to such stakeholder groups with key information to include but not limited to rationale for project, project location and setting, key components, and activities of the Project and other as applicable. The handout is provided in Annex 5.

The table below presents summary for the outcomes of the stakeholder consultations undertaken, the table also presents the social issues and impacts discussed during the 2024 consultation updates with Ras Ghareb City Council, Wadi Dara Local Unit and Bedouin groups, which are critical to consider in the project's construction plans and HSE management..

Public Consultation Session – ESIA

Once the Draft ESIA is completed, a public consultation session will be held in Ras Gharib City, Red Sea Governorate. The overall objective of the session is to present the outcomes and conclusions of the ESIA studies to allow interested stakeholders (including local communities) to comment on the scope of work undertaken.

As required by EEAA, the session will be an 'open' session for any entity/person to attend that will be announced through appropriate platforms (including newspaper advertisement) at least 2 weeks in advance of the session. In addition, specific invitations will be issued to list of invitees that will be identified jointly in coordination between EEAA, RCREEE and the ESIA consultant and will include: (i) EEAA headquarter and regional branch; (ii) New and Renewable Energy Authority (NREA); (iii) Egyptian Electricity Transmission Company EETC; (iv) local governmental entities in Red Sea Governorate and Ras Gharib; (v) NGOs; (vi) local community representatives; and other.

Table 4: Summary of Consultations Undertaken during ESIA Process

No.	Entity	Objective	Outcomes
1	EEAA	Introduction of project and location, discuss overall methodology for ESIA, key anticipated impacts, and determine any key issues of concern and/or additional requirements to be considered as part of the study or the ESIA.	<p>A meeting was held with Mr. Maher Mahmoud/ Head of the Regional Branch Office of EEAA in the Red Sea Governorate. Key points noted include the following:</p> <ul style="list-style-type: none"> He explained the importance of the Project area being located within key bird migration routes and therefore this impact in particular should be thoroughly studied and analyzed. In addition, other impacts of the project on the surrounding environment in general should be studied including in particular impacts resulting from natural factors such as floods. The ESIA team discussed some of the key environmental problems in the project area, mainly problems related to the existence of poultry farms in Wadi Dara, which dispose of farm waste and carcasses in an improper manner, causing pollution. It was explained that if such practices continue, they could also have an impact on the project as they do attract birds and animals. Eng. Maher stated that the Environment Office in the Red Sea Governorate is carrying out many environmental campaigns, whether to raise awareness or monitor environmental violations, such as dumping waste by such entities above and others or hunting activities within the area. This is done in cooperation with the Department of Natural Reserves and the Environmental Department of Ras Ghareb City Council. <p>The consultant held a meeting with Dr. Tamer/ Head of the Natural Reserves Department in the Red Sea Governorate (October 2024), stressed that the Gulf of Suez area is an important area for bird migration routes in the Red Sea, which requires taking this aspect into consideration in potential impacts studies of wind farm projects in the area, so that the project does not pose any risks to bird migration routes in the area.</p>
2	EETC		<p>A meeting was held with the following officials: (i) Ms. Hasnaa Mahmoud / General Manager of Environmental and Social Assessments Units; and (ii) Ms. Rasha / Environmental and Social Specialist for Electricity Projects. They both expressed their support to the Project and highlighted the following:</p> <ul style="list-style-type: none"> Clarified that EETC is a main stakeholder in energy production projects, which is in line with the Ministry of Electricity's plan to support clean energy production, and which is in line with Egypt's 2030 plan to support the preservation of the environment and energy sources. Stressed the importance of studying the cumulative impacts of energy production projects from wind farms in the Gulf of Suez area, as NREA's plan includes many projects in the area and such study should also take into account the construction of the various OHTLs for the electricity transmission. Pointed out the importance of continuous consultation with EETC during the various stages of the project until the completion of the ESIA study and the operational phase.
3	NREA		<p>Mr. Akmal Mahmoud / Environmental Studies Office. Key points raised include:</p> <ul style="list-style-type: none"> ESIA study must include the project site and the OHTL, because the electricity transmission lines are a major component of the project and have an impact on the migratory birds in the area.
4	Ministry of Tourism and Archeology	Same as 1 above but with focus on archeology and cultural heritage methodology and	<p>A meeting was held with Mr. Ayman Ashmawy / Head of the Egyptian Antiquities Sector at the General Authority for Antiquities.</p> <ul style="list-style-type: none"> Explained that there are no archaeological discoveries sites recorded close to the project site.

No.	Entity	Objective	Outcomes
		impacts for the ESIA and any issues of concern related to that.	<ul style="list-style-type: none"> Stated that a field survey for the Project site should be conducted to ensure that there are no elements within the site.
5	Nature Conservation Sector of EEAA	Same as 1 above but with focus on biodiversity, birds and bats methodology and impacts for the ESIA and any issues of concern related to that.	<p>Two meetings were conducted with the officials from the Nature Conservation Sector of the EEAA to include: (i) Mr. Osama Al-Gabali / Migratory Soaring Birds project; and (ii) Mr. Ayman Hamada / EEAA - Head of the Central Administration for Biodiversity. <i>It is important to note that MSB Egypt is based in the Egyptian Environmental Affairs Agency (EEAA), which is incorporated within the Nature Conservation Sector (NCS) of the Egyptian Ministry of State for Environmental Affairs (MSEA). MSB Egypt is technically supported by Nature Conservation in Egypt (NCE), BirdLife in Egypt.</i></p> <p>Key points raised include the following:</p> <ul style="list-style-type: none"> Wind farms of tip height more than 100m in the Gebel El Zeit region and 120m in the Gulf of Suez region are currently not accepted by EEAA. If army permits/approvals are issued related to higher tip heights than 100m/120m those are security permits and are not permits or approvals from EEAA. Before any approval is provided by EEAA on increasing tip heights, a cumulative study should be undertaken for the entire Gebel El Zeit and GOS region that assesses the following: <ul style="list-style-type: none"> Collision risk cumulatively given that with the new turbines the clearance between the ground and the rotor tip will be around 7m which is considered risky compared to other rotor diameters Barrier effect. The aim is to study the risk on birds from flying the additional vertical distance due to the increase in tip height of turbines from 100m (or 120m) to the new tip heights. Design mitigation measures should be addressed at the cumulative level such as requiring a distance between the rows to be not less than 1km and a minimum distance between wind turbines of 2.5 – 3.5 the rotor diameter A meeting should be undertaken with EEAA to discuss the heights with all the investors together with RCREEE and the consultants.
6	Ras Ghareb Local Council	Same as 1 above but with focus on land use, infrastructure and utilities and socio-economic methodology and impacts and any issues of concern related to that.	<p>The consultant held number of meetings with officials of Ras Ghareb City Council to include: (i) Mr. Hamid Ahmed / Head of the Ras Ghareb City Council; and (ii) Mr. Ahmed Abdel-Al / Director of Local Unit of Wadi Dara. Key issues raised include the following:</p> <ul style="list-style-type: none"> Officials welcomed the project and explained that wind energy projects are an important investment in Ras Ghareb Stressed that the results of all the consultation activities that were conducted for the Project should be taken into consideration, including in particular any community needs which should be considered as part of community responsibility activities by the Developer. <p>A meeting was held with General Mamdouh Mahmoud/ Head of the Ras Ghareb City Council, in November 2024. During the meeting, the Head of the City Council expressed great interest in wind farm projects but highlighted some key points that may sometimes raise concerns:</p>

No.	Entity	Objective	Outcomes
			<ul style="list-style-type: none"> Coordination with the City Council: Developers must coordinate with the City Council regarding any community service projects targeting the Ras Gharib area. Commitment to Local Employment: Priority must be given to hiring local workers, with minimal reliance on non-local labor. The influx of Chinese workers in Ras Gharib has previously impacted the community, leading to increased housing and rental costs. Compliance with Environmental Standards: Contractors must adhere to environmental regulations, particularly regarding waste disposal. Some contractors currently working on a wind energy project in the area have been dumping construction waste near the road, resulting in fines that, unfortunately, have had little effect. Labor Recruitment through Official Channels: Local labor should be recruited through the City Council or the Labor Office in Ras Gharib to ensure proper registration and protection of workers' rights. Transparent Agreements with Local Workers: Agreements with local workers should be transparent, especially concerning monthly wages and contract details. <p>In addition to the meeting with the City Council Chairman, the consultant held a meeting with Mr. Mohamed Badran, Head of the Local Unit for Wadi Dara Village (November 2024). During the meeting, Mr. Badran highlighted the following points:</p> <ul style="list-style-type: none"> The village suffers from limited water and electricity resources. Therefore, the project should rely on its own resources to meet its needs, as the village's resources are scarce. Could the project contribute to supplying electricity to the village? This request could be considered as a solution to many of the village's challenges. Mr. Badran did not express any concerns regarding the influx of labor into the area or its impact on existing farms. However, he emphasized the importance of proper disposal of construction site waste, as the accumulation of waste on-site or near roads could pose environmental risks, particularly municipal waste generated by site workers.
7	Other key local E&S Directorates	Introduction of project and location, discuss overall methodology for ESIA, key anticipated impacts, and determine any key issues of concern and/or additional requirements to be considered as part of the study or the ESIA.	<p>The Consultant held a meeting with Mrs. Hoda Muslim and Mr. Omar Shaker from the Directorate of Social Solidarity in Ras Ghareb. <i>The Directorate of Social Solidarity is the official governmental entity that acts as the overall management, organization and registration of local community associations, foundations and NGOs.</i></p> <p>Key issues raised include the following:</p> <ul style="list-style-type: none"> Stressed on the importance of giving job opportunities priority to the local communities of Ras Ghareb including in particular the youth, especially during the operation phase, as they are permanent and stable jobs. Ras Ghareb city has educational qualifications specialized in various sectors, which will help meet the project's labor needs. Indicated that the city of Ras Ghareb has experienced contracting companies due to their previous work with petroleum companies. Those should be given priority instead of contractors from outside the city.

No.	Entity	Objective	Outcomes
			<ul style="list-style-type: none"> NGOs are in constant contact with community members and can participate in setting priorities in the areas of community needs to propose projects that achieve the highest benefit to the community.
8	Red Sea Water and Wastewater Company	Same as above but with focus on water supply and wastewater management for the Project area. and any issues of concern related to that.	<p>An interview was held with Ms. Iman Mohamed / Director of the Water and Wastewater Company in Ras Ghareb.</p> <ul style="list-style-type: none"> Explained that the current project site does not conflict with any existing facilities utilized for water and sanitation. The company is able to provide the project's needs for water and sanitation services, but through licensed and approved contractors because the company does not have trucks to transport water or sanitary waste, taking into account that the project site is more than 40 km away from the city of Ras Ghareb, in addition to the fact that the project's needs for water and sanitation services are not available in the village of Wadi Dara, the village closest to the project site.
9	Ras Ghareb citizens	Same as above but with focus on land use and socio-economic methodology and impacts. Key local community representatives will be identified through the Ras Ghareb City Administration and key local NGOs in Ras Ghareb.	<p>The Consultant conducted a FGD with women from the local community in Ras Ghareb City in coordination with Mrs. Enas Abdel Muti, director of the Ebad Al Rahman Association NGO. <i>Ebad Al Rahman Association is considered the biggest and most active local community NGO in the local community that is mainly managed by female workers. The Association was asked to nominate a number of women representatives considered most active within the local community.</i></p> <p>The participants explained that wind energy projects have become very familiar to the community in Ras Ghareb and are supported by the community and government agencies in the city, in the hope that they will provide job opportunities and development projects in the area. The women participating in the session mainly focused on: (i) requiring that priority to such job opportunities are provided to local communities; and (ii) requiring that the Developer undertake a social responsibility program based on local community needs in Ras Ghareb and discussed the following needs:</p> <ul style="list-style-type: none"> The importance of consulting with government agencies and department (such as the labor office and the educational administration) because they have data and information on community needs. Health services for the disabled as the city's health services lack specialized centers to provide health care and rehabilitation for the disabled. Establishing a technical education school to graduate qualified people to work within wind energy projects, which maximizes the future benefit of the community in training and technical qualification. The participants confirmed the importance of knowing the aims and plans which the Developer intends to implement for the residents of Ras Ghareb through their Corporate Social Responsibility (CSR) Program. Developing and establishing schools to help increase the number of operating schools that accommodate larger numbers of students. Stated that unemployment and lack of health services are among the difficulties facing individuals in Ras Ghareb. They also indicated that job opportunities are limited for women and are concentrated in the government sector (education / health / administrative jobs in the city council), in addition to some very limited private economic activities (clothing shops/ beauty salons/ nurseries, etc.).

No.	Entity	Objective	Outcomes
			<p>Another FGD was planned with key local community representatives and businesses in Ras Ghareb. The representatives were to be identified mainly by the Ras Ghareb City Administration. They hoped that investment projects as this one would help provide job opportunities for all including in particular youth which would have a direct impact on the local community. No specific concerns were raised. On the contrary, they made it clear that the Project site is a great distance from the city center, and they do not foresee any direct negative impact on the local community, whether in the construction or operation stage. Other issues raised include</p> <ul style="list-style-type: none"> ▪ They do not feel a direct economic benefit from investment projects in the field of wind energy to date as they believe Developers in general do not depend on the city of Ras Ghareb for supplies and contracting work despite the availability of construction contractors and supplies. ▪ They stated that the City Council has lists of officially registered companies, local contractors, and supply companies ▪ They suggested that job opportunities can be announced through the city council as well and indicated that the city's labor office also has the available workforce according to different specializations. <p>The consultant held a meeting and a FGDs with Business Community (local subcontractors) in Ras Gharib (October 2024) to introduce the project. Community members from the contracting sector raised some concerns related to the establishment of wind farms in the area:</p> <ul style="list-style-type: none"> ▪ Lack of Direct Benefits: So far, we have not experienced any direct benefits from the wind farms currently under construction or those that have completed construction and entered operation. External contractors are being hired instead of local ones. ▪ Transparency in Announcing Opportunities: The process of announcing contracting opportunities during the construction phase must be transparent, as we are not informed about them in a timely manner. <p>The consultant conducted FGD with youth from the local community in Ras Ghareb.</p> <p>The youth explained that Ras Ghareb is a small city that lacks many services, in addition to limited job opportunities. We hope that investment projects will contribute to providing job opportunities for young and reviving the local market. It will have a direct impact on the local community.</p> <p>None of the community members objected to the project or expressed any concerns about it. On the contrary, they made it clear that the project site is a great distance from the city, in addition to the absence of any direct negative impact on the local community from the project, whether in the construction or operation phase.</p> <p>Some young raised the following issues:</p>

No.	Entity	Objective	Outcomes
			<ul style="list-style-type: none"> The community in Ras Gharib city does not feel a direct economic benefit from investment projects in the field of wind energy, as the project owners do not rely on Ras Gharib city for supplies and contracting works despite the availability of building and supply contractors. Young from Ghareb should be announced about job opportunities available during construction and operation. Job opportunities for individuals and companies can be announced through the city council.
10	Local Businesses in Wadi Dara	Same as above but with focus on socio-economic methodology and impacts. Key Local businesses will be identified from the Ras Ghareb city council database.	<p>Several meetings were undertaken to include: (i) owners of poultry farms; (ii) owners of livestock farms; and (iii) head of the Agricultural Association in the village of Wadi Dara. Key points raised include the following:</p> <ul style="list-style-type: none"> Wadi Dara is located on the southern east border of the project site. There are permanent and non-permanent residents in the area. The village has around 100/150 permanent residents that house mostly men attending to these businesses and lands as well as five families living in Wadi Dara (which are the only families living in Wadi Dara), with an average size of 4 members. The village is highly dependent on the city of Ras Ghareb for public services, especially in regards to its medical services. People in Wadi Dara suffer from a lack of basic services and utilities, especially electricity and water. They rely on generators with diesel for electricity as well as water trucks from Ras Ghareb. These are some of the important factors in the poor economic development of the village. Interviewees do not have any negative attitudes towards wind energy projects and no key issues of concern were raised Interviewees hoped that the presence of investments in wind farms in the area will help provide electricity to the village of Wadi Dara. However, it was explained to them by the Consultant that the project has an obligation under the signed PPA to sell electricity to the government. Therefore the residents of Wadi Dara could benefit indirectly from this, if later electricity transmission is expanded to Wadi Dara. However, they could be other benefits such as employment.
11	Bedouins residing near the project area	Same as above but with focus on land use and socio-economic methodology and impacts. Consultations will be undertaken with head of tribal leader.	<p>A FGDs was undertaken with the Bedouins in Ras Ghareb and other nomadic Bedouin families who live in the areas surrounding the Project site near the mountain. They explained the complex systems and rules between the Bedouin tribes that can be summarized as follows:</p> <p>There are several Bedouin tribes in Ras Ghareb. These tribes settle in separate areas of the Red Sea Governorate and the Governorates of Upper Egypt. Families from the three tribes that are the Ma'aza, Bashareya, and Ababdeh tribes are settled in Ras Ghareb, Zafarana and Wadi Dara. However, the Ma'azah tribe is the most numerous of the tribes in the Project area. The Ma'azah is divided into three families, which are: The Hammadin, Tababna and Khoshman families. Some of the three families are sedentary, and live deep in the desert, far from the city and villages like the Khoshman family. Relationships between Bedouin families are very organized according to the customary law known as "Urfi" or "Ghafra system" that governs them, where the Ghafra system is an informal security system and the "Urfi" is the unofficial law that governs the relations of Bedouin families and the borders of their control over land. Bedouins cannot cross the border between each other, because this could create endless conflicts between them, and this is</p>

No.	Entity	Objective	Outcomes
			<p>undesirable and unacceptable for the heads of families. The Bedouins respect the customary arrangements between them because they preserve the right of each family to the land.</p> <p>The project site falls under the Ghafra system of the Ma'aza tribe and specifically under the Hammadin family of the Ma'aza tribe. Nevertheless, the Khoshman family works with the Hammadin family through the Ghafra system as the two families are related.</p> <p>Consultations were undertaken with Sheikh Eid Mesalam - head of the Hammadin family along with a number of male and female representatives from this family and the Khoshman family.</p> <p>The Bedouin families had no issues or concerns regarding the Project development. Conversely, they welcomed the Project. In general, the Bedouin families benefit from project developments in their areas as they provide safety and security for the project area under the Ghafra system in which they follow.</p>



Figure 4- Meeting with the head of Ras Ghareb City Council



Figure 5- Meeting with Head of the regional branch office of EEAA in the Red Sea Governorate



Figure 6- Photos from the meetings with local business owners in Wadi Dara





Figure 7- Photos from consultation activities with Bedouin families



Figure 8 FGD with women from the local community in Ras Ghareb City

6. FUTURE STAKEHOLDER ENGAGEMENT STRATEGY, PLAN, AND RESPONSIBILITIES

The table below identifies the stakeholder engagement strategy and plan to include stakeholders relevant to the Project (Table 5), the objectives of the consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations.

A Project Stakeholder Register will be updated on monthly basis for the Project which serves as a log for all consultation and engagement undertaken for the Project. This shall be reviewed and updated regularly by related stakeholders. A template is provided in Annex 4 – Project Stakeholder Register Form which will be used wither in Microsoft Word or Excel format.

Table 5: Stakeholder Engagement Strategy and Plan in Relation to the Project

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Stakeholders who may be directly or indirectly affected by the project				
Nearby local communities and residents to include Wadi Dara and Ras Ghareb. This also includes vulnerable groups.	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. Hardcopy of SEP in Arabic to be available at Red Sea Governorate and Ras Ghareb Local Governmental Unit.	Once before construction (to be updated when required)	Developer (CLO)
		2. Summary advertisement in Arabic of grievance mechanism to be posted at key local community platforms to include CBO's (including women) and through the distribution of flyers in both Arabic and English. Refer to Chapter 7 for additional details.	Once before construction (to be checked regularly to ensure advertisement in place)	Developer (CLO)
	Updates on the Project including environmental and social issues, CSR activities undertaken, Construction Milestones and Employment and Supplier Opportunities.	<p>1. Prepare leaflet in Arabic with updates on Project including environmental and social issues. This could include updates on the Project development, number of employment opportunities allocated for local communities, CSR activities, the bidding process for Project components, construction plans, etc.</p> <p>Leaflet to be disclosed at key local community platforms to include Red Sea Governorate and Ras Ghareb Local Governmental Unit. In addition, it will also be updated on company website and social media platforms.</p> <p>1. Simplified presentations on SEP/ Grievance Mechanism/ E&S issues/ CSR activities. Such presentations need to be fully tailored to the educational levels and needs of the target group.</p> <p>The presentations should include the following two topics as they are critical to address community impacts and community needs: 'Construction Milestones' (especially when impacting local traffic and solid waste disposal) and 'Employment and Supplier Opportunities.'</p> <p>Presentations to be delivered by the Project CLOs, who will be trained in designing and delivering such presentations.</p>	<p>Quarterly during construction</p> <p>Annually during operation</p>	Developer (CLO)

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Bedouin Groups	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. Individual targeted meetings with tribal leaders of such groups to explain SEP and grievance mechanism	Annually during construction and operation	Developer (CLO)
	Updates on the Project including environmental and social issues and CSR activities undertaken	2. Prepare and distribute leaflet in Arabic with updates on Project including environmental and social issues. This could include updates on the Project development, number of employment opportunities allocated for local communities, the bidding process for Project components, construction plans, updates on CSR programs implemented, etc. 3. Simplified presentations on SEP/ Grievance Mechanism/ E&S issues/ CSR activities. Such presentations need to be fully tailored to the educational levels and needs of the target group. The presentations should include the following two topics as they are critical to address community impacts and community needs: 'Construction Milestones' (especially when impacting local traffic and solid waste disposal) and 'Employment and Supplier Opportunities.' 4. Presentations to be delivered by the Project CLOs, who will be trained in designing and delivering such presentations.	Quarterly during construction Annually during operation	Developer (CLO)

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Residents of Ras Shukeir	Updates on the Project including environmental and social issues, CSR activities undertaken, Construction Milestones and Employment and Supplier Opportunities.	<ol style="list-style-type: none"> 1. Prepare leaflet in Arabic with updates on Project including environmental and social issues. This could include updates on the Project development, number of employment opportunities allocated for local communities, CSR activities, the bidding process for Project components, construction plans, etc. 5. Leaflet to be disclosed at key local community platforms to include Red Sea Governorate and Ras Ghareb Local Governmental Unit. In addition, it will also be updated on company website and social media platforms. 6. simplified presentations on SEP/ Grievance Mechanism/ E&S issues/ CSR activities. Such presentations need to be fully tailored to the educational levels and needs of the target group. The presentations should include the following two topics as they are critical to address community impacts and community needs: 'Construction Milestones' (especially when impacting local traffic and solid waste disposal) and 'Employment and Supplier Opportunities.' 7. Presentations to be delivered by the Project CLOs, who will be trained in designing and delivering such presentations. 	<p>Quarterly during construction</p> <p>Annually during operation</p>	Developer (CLO)
Project workforce - including those of (sub-) contractors, and those workers that are hired locally as 'casual workers' and 'day labourers'	Provide updates on contract requirements on employment to include duration, salary, leaves, etc.	1. Individual/Internal Meetings	Upon employment	Developer Team as applicable / EPC Team as applicable
	Provide explanation on worker grievance mechanism	1. As part of Induction Training As part of Toolbox Talks	Upon employment / continuous	
	Provide general/specialized training requirements as applicable to include but not limited to induction, Toolbox Talks (TBT), occupational health and safety, waste management, etc.	As per training plan to be developed	Upon employment / continuous	

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
	The Project workforce, especially locally hired workers, will need to be informed about the temporary nature of the employment opportunities.	A 'Demobilisation Strategy' as well as the content of 'Severance Packages' need to be ready in draft at the start of construction, so that it can be communicated to the Project workforce upon Induction, and once more prior to Demobilisation.	Upon employment / continuous	
Stakeholders who may participate in implementation of the Project				
Lender	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.)	1. Individual/Internal Meetings (if required)	TBD	Developer team as applicable
		2. Submission of environmental and social report.	Annually during operation – 1 st quarter of each year	Developer team as applicable
			Monthly during construction	
		2.		
		3.		
Stakeholders who may have a possibility to influence and make decisions on implementation of the Project and/or may have an interest in the Project				
Central Government				
1. EEAA 2. EETC 3. NREA 4. Ministry of Interior 5. Ministry of Labor 6. Ministry of Health	Some governmental stakeholders might require to undertake certain inspections or auditing exercises and/or might require certain updates/information on the implementation of the Project.	1. Individual/Internal Meetings (if required)	Upon occurrence	Developer team as applicable
		2. Correspondence and official letters (if required)	Upon occurrence	Developer team as applicable

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, CSR programs implemented, etc.)	1. Email notification. Annual environmental and social report to be disclosed on company website.	Annually – 1 st quarter of each year	Developer (CLO)
Ministry of Transportation / Roads and Bridges Directorate, Red Sea Governorate	Submission of traffic and transport management plan in relation to turbine transportation	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction	Developer team as applicable / EPC Contractor
Ministry of Civil Aviation	Submit application to obtain their approval for Project development	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once during planning phase	Developer NREA RCREEE
Armed Forces Operations Authority	Submit application to obtain their approval for Project development	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once during planning phase	Developer NREA RCREEE
National Telecom Regulatory Authority Telecommunication Operators Radio and Television Union	Submit application to obtain their approval for Project development	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once during planning phase	Developer NREA RCREEE
Local Government				
Ras Ghareb Local Unit	Coordination for the collection of solid waste from the site to the municipal approved landfill	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
	Coordination for list of private contractors approved for collection of hazardous waste from the site to the Swaqa Hazardous Waste Treatment Facility.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Ras Ghareb Water Company	Coordination for list of private contractors approved for collection of wastewater from Project site.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
	Coordination to secure the water requirements of the Project (if required)	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Ministry of Antiquities – Red Sea Antiquities Inspection Office	Notify to check if they will provide any observers to oversee excavation process	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction	EPC Contractor
	Reporting and communication in case archeologically remains are found through construction of Project along with chance find procedures implemented.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Upon occurrence	EPC Contractor
Non-Governmental Organizations (NGOs)				

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
As per list provided earlier	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, CSR programs implemented, etc.)	1. Email notification. Annual environmental and social report to be disclosed on company website.	Annually – 1 st quarter of each year	Developer (CLO)

ESIA and Supporting Documents Information Disclosure

It is of utmost necessity to ensure that stakeholders are kept well informed about the Project throughout its life cycle, thus information will be accessible to the public, key stakeholders, and local communities through dissemination of related documents.

The disclosure package will include the following key documents that are available publicly in Arabic and English language.

- Environmental and Social Impact Assessment (ESIA) for the Scatec Wind Farm that will also include the associated Overhead Transmission Line (OHTL)
- Non-Technical Summary (NTS)
- Stakeholder Engagement Plan (SEP)

The above documents are available at the following avenues:

- Developer Website. The documentation above will remain on the website for the life of the project.
- Hard copies available at Red Sea Governorate and Ras Ghareb Local Governmental Unit

Red Sea Governorate

October 6, Hurghada,
Red Sea Governorate, Egypt
Tel: 065354627/06535546337

Ras Ghareb Local Governmental Unit

Location: Al-Mina Street City: 11432
Ras Ghareb – Red Sea
Tel: 01001318480 – 0120195877

- Soft copies can also be made available to stakeholders via email to (insert email of CLO). In addition, any inquiries or comments with the Developer can be directed to this email address as well.

Finally, it is important to note that all stakeholders can raise concerns or comments via the grievance mechanism provided in “Chapter 7” below.

7. GRIEVANCE MECHANISM

7.1 Stakeholder Grievance Mechanism

Scatec understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities, and other stakeholders. Monitoring of grievances will signal any recurrent issues, or escalating conflicts and disputes.

Scatec will implement a Grievance Mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. Scatec will accept all comments and complaints associated with the Project and individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Egypt.

Scatec will register and monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below. Scatec will also report regularly to the public on the grievance mechanism implementation, protecting the privacy of individuals.

The project will need to establish a “grievance database” to record grievances (see Annex 2 – Public Grievance Log Sheet; which include samples of grievance registry). Such a database will need to distinguish between genuine grievances on the one hand and requests for information and/or clarification due to misunderstanding on the other hand, through information that clarifies the subject of the complaint/inquiry. Therefore, the grievance registry should include the following items, which will form the grievances database:

- How Was grievance submitted
- Date of Submission of Grievance
- Name and Contact Information
- Description of Grievance
- Actions Taken to Resolve the Grievance
- Date of Communication of Solution
- Has grievance been resolved (Y/N) if not explain why.

All grievance should be documented to ensure verification of the process. A quarterly grievance monitoring report should be developed to track all submitted grievances. These quarterly reports must include an analysis of the aforementioned indicators. Additionally, key findings and analyses should be documented in the annual report.

The figure below presents a process diagram for the stakeholder grievance procedure which is further explained throughout the section below.

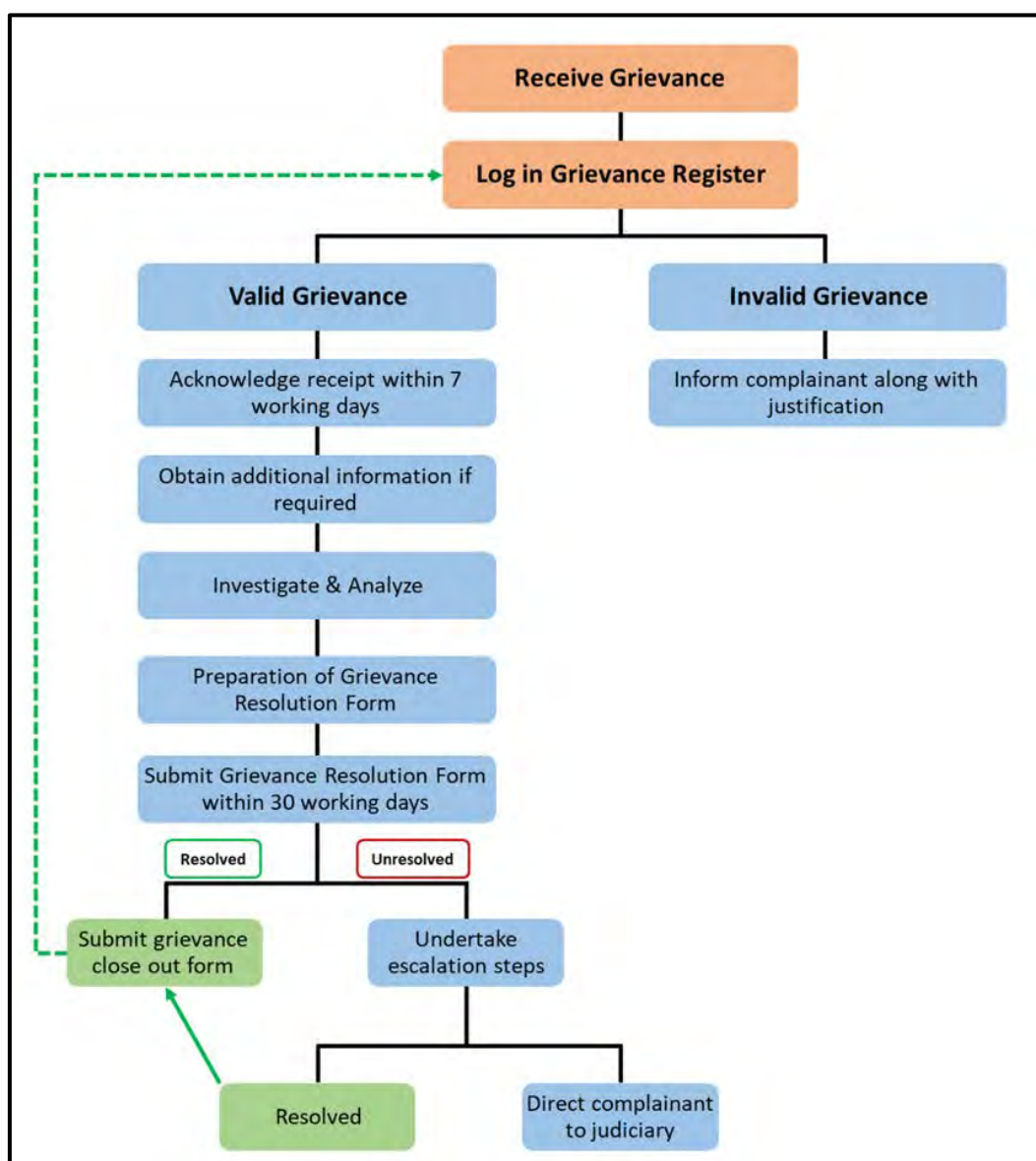


Figure 9: Stakeholder Grievance Process Diagram

Stakeholder Grievance Procedure

The grievance documentation process begins at the stage of receiving grievances. The first step following receipt is verifying the grievances based on their subject matter: determining whether the grievance is related to project activities and whether it is a genuine issue or a malicious claim without basis.

Once the grievance has been verified, the resolution process begins. The steps involved in addressing the complaint are outlined in the diagram above.

If the complainant is dissatisfied with the resolution process, they have the right to escalate their complaint to a higher level by submitting it Direct Contact to the developer. Should there be no response or resolution, the complainant retains the right to seek legal recourse.

1. A Grievance Disclosure Sheet will be disclosed at key locations. The Grievance Disclosure Sheet will inform the local communities on how and where to lodge a grievance in accordance with step 2 below.
 - a. Red Sea Governorate
 - b. Ras Ghareb Local Governmental Unit
 - c. Selected key NGOs and CBOs to include Women

- d. Entrance Office of the Project
 - e. Other identified suitable local community platforms
2. Stakeholders willing to lodge a grievance should be able to use the following avenues:
- a. Grievance Sheets (Annex 1) with grievance boxes will be made available at the following locations:
 - **Ras Ghareb Local Governmental Unit**
 Location: Al-Mina Street City: 11432
 Ras Ghareb – Red Sea
 Tel: 01001318480 – 0120195877
 - **Project Office**
 Location:
 Tel:
 Fax:
 - b. Direct Contact through the following:

CLO

Address:

Telephone:

E-mail:
3. All grievances (whether submitted through a grievance form, e-mail, telephone, etc.) will be recorded on a grievance log sheet by the CLO (Annex 2).
 4. It is possible that for some grievances, women might feel uncomfortable discussing a grievance with a person of the opposite sex, therefore the grievance mechanism also includes a female CLO that will be available.
 5. This mechanism is applicable for any project related stakeholder group to raise a grievance. This includes but not limited to national / regional governmental entities, local communities, Non-Governmental Organizations (NGOs), media, research, and academic institutions, and other. This mechanism addresses grievances related to the following:
 - Any grievance related to project activities to include but not limited to: (i) damage to public / private assets; (ii) degradation / deterioration of local infrastructure (e.g. roads); (iii) disturbance from noise, dust, traffic accidents, pollution, excessive speed of project's vehicles; (iv) degradation of the environment and disturbance of wildlife; (v) disturbance to land uses, (vi) other similar issues.
 - Any grievance against involved person/entity in the project to include but not limited to the Company, EPC Contractor, subcontractors, and suppliers. This could include but not limited to: (i) negative behavior of construction workforce towards local communities; (ii) conduct of security providers; (iii) inappropriate behavior of workers in terms of managing employment and procurement opportunities, (iv) other similar issues.
 6. Grievance procedure starts with formal acknowledgment in accordance with the preferred method of communication specified by the complainant within 7 working days of submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

7. In coordination with the relevant personnel, the CLO will analyze the root cause of the grievance, investigate if the grievance is correct or not, and identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable). For other more complex grievances, third parties could be involved in the investigation as applicable.
8. The CLO will prepare a grievance resolution form (see Annex 3) which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. Grievance resolution form will be submitted within (30) days of receiving the grievance.
9. The grievance resolution form, including necessary budget to resolve the grievance, must be approved and signed-off by the Project Manager.
10. The outcomes of the grievance resolution form will be communicated to the complainant by the CLO in accordance with the preferred method of communication specified.
11. If the griever is not satisfied with the response or action undertaken, the griever may pursue the matter with external authorities as per local judiciary system.
12. In the case the grievance resolution form identifies proposed actions to be implemented, the CLO will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form. The CLO will contact the complainant once such actions are completed in accordance with the preferred method of communication specified
13. The CLO will ensure that the grievance forms, grievance log sheet, and grievance resolution form are always updated and maintained onsite.
14. The grievance mechanism will be implemented promptly and at no cost and without retribution to the party that originated the issue or concern.
15. The use of grievance mechanism shall not impede access to judiciary means.
16. The grievance mechanism allows submission of anonymous complaints by community members.

Grievance Mechanism for Gender Based Violence, Sexual Harassment and Sexual Exploitation and Abuse

The requirements set below are considered applicable for handling grievances related to the following and in accordance with the requirements set within the “Good Practice Note Addressing Gender Based Violence in Investment Project Financing Involving Major Civil Works” (2018, World Bank).

- **Violence Against Women and Girls (VAWG)**: defined violence against women and girls as any act of gender-based violence that results in, or is likely to result in, physical, sexual, or mental harm or suffering to women, including threats of such acts, coercion, or arbitrary deprivation of liberty, whether occurring in public or in private life
- **Gender-based Violence (GBV)** is an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. Women and girls are disproportionately affected by GBV across the globe.
- **Sexual Exploitation and Abuse (SEA)**: any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual abuse is further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” Women, girls, boys, and men can experience SEA. In the context of World Bank supported projects, project beneficiaries or members of project-affected communities may experience SEA.

For the above complaints, there are risks of stigmatization, rejection, and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. Therefore, the following steps should be considered for any grievances related to the above.

- Both the male and female CLO will receive appropriate training from an authorized GBV Service Provider on how to collect GBV cases confidentially and empathetically (with no judgement). It is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs, and wishes are prioritized in every decision related to the incident. The survivor who has the courage to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's informed consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor.
- Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.
- No identifiable information on the survivor should be stored including in particular the grievance log register. In addition, if a grievance is submitted through a grievance form it will be kept confidential.
- Should the grievance be received by the CLO through a grievance form, telephone, email or other, the CLO should not ask for, or record, information on more than three aspects related to the incident and which include the following:
 - Nature of the complaint (what the complainant says in her/his own words without direct questioning)
 - If, to the best of their knowledge, the perpetrator was associated with the project; and,
 - If possible, the age and sex of the survivor.
- The CLO should assist the survivor by referring them to the GBV Services Provider for support immediately after receiving a complaint directly from a survivor. It is up to the survivor, and only the survivor, whether to take up the referral. The list of services providers are included below:

[Insert contact details of GBV Service Provider]

- The GBV Services Provider provides the necessary support to the survivor until it is no longer needed. Survivors may need access to police, justice, health, psychosocial, safe shelter and livelihood services to begin healing from their experience of violence. This will be arranged by the GBV Services Provider on their behalf in accordance with the survivor's wishes.
- The CLO will immediately notify the Project Manager (if the consent of the survivor is obtained). The survivor must give consent to data sharing and know what data will be shared, with whom and for what purposes.
- The CLO, Project Manager and GBV Services Provider will meet immediately to agree on a plan for resolution as well as the appropriate remedy for the perpetrator in accordance with the below. Note: The survivor must give the service provider representative consent to participate in the resolution mechanism on her/his behalf.
 - Reviews the case and collectively agree upon the appropriate actions to be taken and sanctions, if any.
 - Refers the case to the police as appropriate (see note below).
 - Assigns the appropriate 'Focal Point' to implement the actions—with the assistance of the GBV Services Provider.
 - Upon resolution, the Focal Point and GBV Services Provider advise that it has been resolved, who in turn advise the CLO

- The CLO notes the resolution and closes the cases and submits a close-out report to the Project Manager whom in turn reviews and approves the report.
- All entities involved above in case resolution, need to understand their legal obligations when it comes to reporting cases to the police. Reporting should be done in accordance with the law, especially in cases that require mandatory reporting of certain types of incidents, such as sexual abuse of a minor. When there is no legal obligation to report the case according to the local law, survivors hold the decision of whether to report cases for resolution and other service providers and reporting of a case to anyone can only be made with the consent of the survivor.
- If a case is first received by the GBV Services Provider, a report should be sent to the CLO to ensure it is recorded in the system. If any follow up is required by the CLO, it will be provided immediately with the consent of the survivor as applicable.
- If the survivor does not wish to place an official complaint through the grievance mechanism, the complaint is considered closed.
- If the alleged perpetrator is an employee of the Developer, EPC Contractor, or subcontractor, to protect the safety of the survivor, and the workplace in general, the worker, in consultation with the survivor—and with the support of the GBV Services Provider—should assess the risk of ongoing abuse to the survivor. Reasonable adjustments should be made to the alleged perpetrator’s work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary.

7.2 Worker Grievance Mechanism

The following presents the worker grievance mechanism procedure that will be implemented and also includes measures for escalation of grievances by workers. It is important to note that the CLO will act as the Worker Grievance Mechanism coordinator and apply the requirements of this mechanism as detailed below. The CLO acting as Worker Grievance Mechanism coordinator, must have the necessary knowledge and experience working on labor rights and working conditions in Egypt, or should receive training on this topic

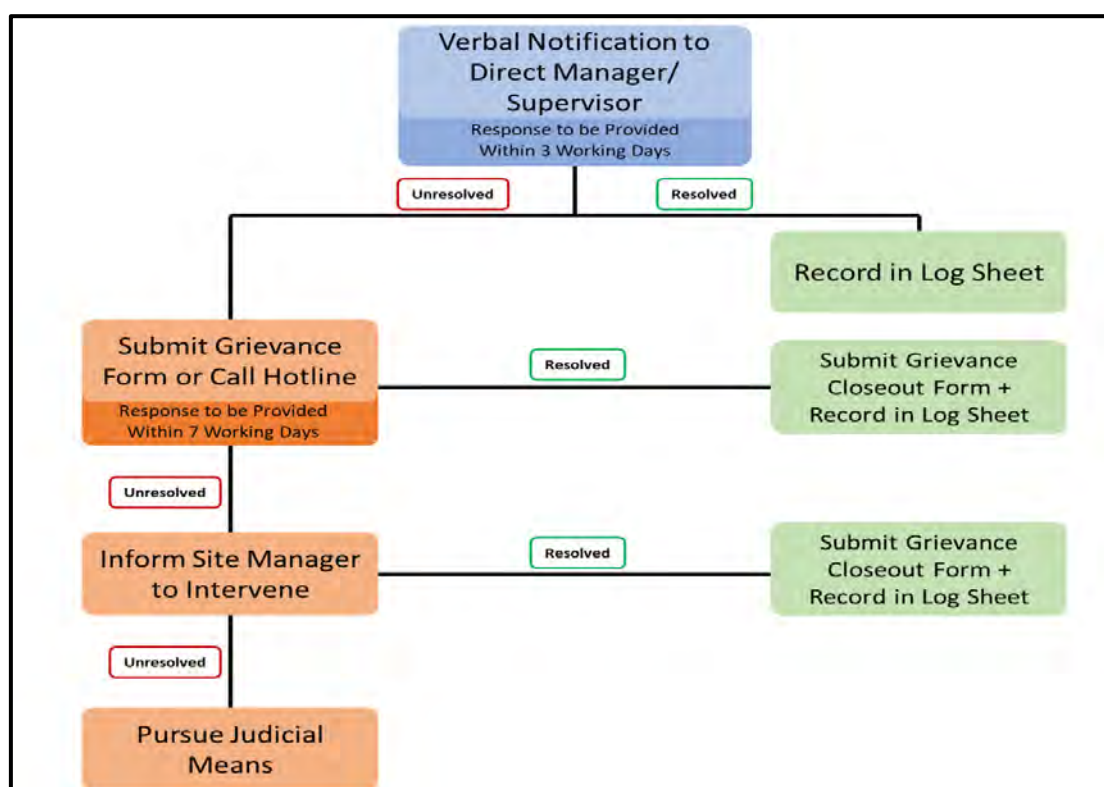


Figure 10: Worker Grievance Process Diagram

A worker refers to any employee of Developer, EPC Contractor or employees of contractors or subcontractors hired by EPC Contractor for the Project. This includes all workers on site including subcontractors, casual workers and day labourers hired by the Project.

- At first, all employees are encouraged to resolve any grievances through communication with their direct manager or supervisor. Therefore, the grievance mechanism starts through a verbal notification by the employee to their direct manager or supervisor. The direct manager or supervisor shall give his/her verbal reply within three (3) working days. If the grievance is solved through direct communication with managers or supervisors, then the employee does not need to submit a written grievance separately. The grievances should still be reported by the relevant managers or supervisors to the CLO to be recorded within a grievance log sheet. If the complaint is against the direct manager or supervisor, then the procedure set out below should be followed instead.

The project will need to establish a “workers grievance database” to record grievances (see Annex 8: Worker Grievance Log Sheet; which include samples of grievance registry). the grievance registry should include the following items, which will form the grievances database:

- How Was grievance submitted
 - Date of Submission of Grievance
 - Name and Contact Information
 - Description of Grievance
 - Actions Taken to Resolve the Grievance
 - Date of Communication of Solution
 - Has grievance been resolved (Y/N) if not explain why.
- In case the grievance is not resolved through direct communication, or if the employee is not satisfied with the response or action to the complaint by the direct manager or supervisor, then the employee shall submit a grievance form as provided in Annex 6. which includes information on the name of the employee, contact information, description of the grievance and the suggested solution to resolve the grievance.
 - Grievance forms and a grievance box will be made available at all times during construction at key locations onsite (e.g. office locations and other as appropriate). The grievance form will be available in English and Arabic language. Location of grievance forms and grievance box will be communicated to all employees as part of the induction training by the CLO. Workers should be trained on the grievance mechanism (process, how it works, etc.) during Induction.
 - The developer should routinely (weekly!) follow up/monitor the handling of worker complaints and the grievances mechanism in toolbox meetings throughout the construction phase. This will be done by following the grievance mechanism/ plan of the project and contractors.
 - The CLO will check daily the grievance box to collect any submitted grievance.
 - The grievance mechanism will allow for anonymous lodging of complaints. In addition, where the complainant is illiterate, the complaint can be made verbally in confidence to CLO whom in turn will complete the grievance form on behalf of the complainant. In addition, a hotline for workers will also be available for those having difficulty in written expression as per the below details:
- Hotline for Worker Grievances: [to be updated later]**
- The CLO will follow up on the grievances submitted and aim to resolve the grievance. The CLO will analyze the root cause of the grievance, investigate if the grievance is correct or not, and provide an attainable solution to resolve the grievance in coordination with the employee, direct manager/supervisor, and other personnel as appropriate which could also include the Site Manager. The CLO should complete this step within seven (7) working days from date of submission of the grievance.
 - In the case of anonymous complaints, the CLO will notify the relevant department to take appropriate actions. The response to anonymous grievances will be published in places/channels visible to all workers.

- The CLO will communicate with the complainant (based on the preferred method of communication suggested by the complainant in the grievance form) to notify him/her on the action taken to resolve the grievance.
- In the case a grievance is not resolved, or if the worker is not satisfied with the response or action undertaken, the CLO will inform the Site Manager to intervene and aim to resolve the grievance.
- Upon resolving the grievance, a grievance closeout form will be submitted to be signed off by the worker and CLO and which will detail the solution that was implemented to resolve the grievance as provided under **Annex 7**. In addition, a worker grievance log sheet will be developed and maintained throughout the construction duration which provides details on all grievances submitted as provided **Annex 8**. The grievance forms, grievance closeout forms and grievance log sheet will be maintained onsite at all times.
- If the worker is not satisfied with the response or action undertaken, the worker may pursue the matter with external authorities as provided by the Egyptian Labor Law.
- The CLO will designate a suitably trained person of the other sex to process grievances in which male / female workers might feel uncomfortable discussing with a person of the opposite sex.
- Any employee raising a grievance will not be subject to any reprisal or discrimination acts.
- The use of grievance mechanism by workers shall not impede access to judiciary means.
- The worker grievance mechanism will be updated when required due to any change in the implementation of the mechanism during the construction phase.

Grievance Mechanism for Gender Based Violence, Sexual Harassment and Sexual Exploitation and Abuse

- A similar mechanism to that of the Stakeholder mechanism will be implemented specifically for the GBVH grievances. Please refer to “Section 7.2” for additional details.

Requirements for EPC Contractor and Subcontractors on Worker Grievance Mechanism

- Developer will contractually require EPC Contractor and all contractors or subcontractors to implement this grievance mechanism for their respective employees and will also monitor its implementation to ensure compliance. Similarly, subcontractors are required to maintain grievance forms, grievance closeout forms and grievance log sheet onsite at all times. These must be provided to the CLO upon request.
- The developer is expected to communicate the requirements of this workers’ grievance mechanism (including contracting!) to the EPC and (sub) contractors; both at the start of construction, as well as throughout the construction phase, and 2. The developer is expected to monitor contractor compliance.

All grievance should be documented to ensure verification of the process. A quarterly grievance monitoring report should be developed to track all submitted grievances. These quarterly reports must include an analysis of the aforementioned indicators. Additionally, key findings and analyses should be documented in the annual report.

8. MONITORING AND REPORTING

8.1 Monitoring Requirements

The following monitoring requirements will be undertaken by the CLO with regards to the implementation of the SEP:

- Weekly inspections will be undertaken at stakeholder grievance boxes and worker grievance boxes to collect any grievance forms
- Twice per month inspections will be undertaken to ensure: (i) SEP is disclosed in hard copy at the Red Sea Governorate and Ras Gharib Local Administration; (ii) summary advertisements of grievance mechanism are available at local community platforms
- Quarterly inspections will be undertaken to: (i) ensure project update leaflets are available at local community platforms; (ii) stakeholder grievance boxes and forms are available at designated locations; (iii) worker grievance boxes and forms are available at designated locations
- CLOs to monitor working conditions on site, in collaboration with Project H&S staff (from Developer, EPC Contractor and its (sub-) contractors).
- CLOs to attend toolbox meetings of various on-site contractors on a regular basis.
- Undertake monthly inspections on EPC Contractor and involved subcontractors on implementation of worker grievance mechanism. Inspections will include:
 - Visual observation to ensure EPC Contractor/subcontractor(s) provide grievance boxes
 - Discussion with sample of workers to ensure they are familiar with the process
 - Collection and review of grievance forms, grievance closeout forms and grievance log sheet

8.2 Reporting Requirements

The following reporting requirements will be prepared by the CLO with regards to the implementation of the SEP:

- On a monthly basis the stakeholder register form will be submitted as provided in Annex 4.
- On a monthly basis the stakeholder grievance form will be submitted as provided in Annex 2.
- On a monthly basis the worker grievance form will be submitted as provided in Annex 8.
- The SEP will be updated and resubmitted on a bi-annual basis during the construction phase and on a semi-annual basis during the operation phase.
- The following Key Performance Indicators (KPI) will be reported on a monthly basis:

No.	KPI	Measurement Action
1	Number of stakeholder engagement activities undertaken	All communication to be reported in stakeholder register
2	Number of stakeholders involved	All communication to be reported in stakeholder register
3	Number of vulnerable groups engaged (including women groups)	All communication to be reported in stakeholder register

No.	KPI	Measurement Action
4	Number of requests for information via websites, CLOs and local information centers	All communication to be reported in stakeholder register
5	Number of stakeholder / worker valid grievances submitted (and number rejected as outside of scope)	All grievances to be reported in grievance register
6	Number of resolved stakeholder / worker grievances	All grievances to be reported in grievance register
7	Number of stakeholder / worker grievances related to GBVH	All grievances to be reported in grievance register
8	Average time for resolution of stakeholder / worker complaints	All grievances to be reported in grievance register
9	Type of stakeholder / worker grievances submitted	All grievances to be reported in grievance register
10	Number of issues/concerns raised and number of issues/concerns resolved during engagement activities.	All grievances to be reported in grievance register

9. ROLES AND RESPONSIBILITIES

This chapter identifies the roles and responsibilities related to implementation of the SEP.

Project Manager – Scatec

- Ensure resources required are available for the implementation of this Stakeholder Engagement Plan
- Oversee the overall implementation of this Stakeholder Engagement Plan
- Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.

Community Liaison Officer (CLO) – Scatec (Male and Female)

- Update the SEP as required during the implementation of the project to include planning, construction, and operation
- Overall responsibility for implementing the requirements of the stakeholder engagement strategy as identified under 'Chapters 6, 7 and 8'
- Overall responsibility for implementing the requirements of the stakeholder grievance mechanism to include distribution of grievance disclosure sheets, collection of grievance forms, updating grievance log sheet, filling grievance resolution forms and grievance close-out forms.
- Worker Training during worker induction; CLOs to deliver a training module on worker rights (including the grievance mechanism) and working conditions in the Project.

- The EPC CLO must have in-depth knowledge and experience working on labor rights and working conditions in Egypt, or should receive extensive training on this topic.
- The EPC CLO will only work on the project workforce and not on any other stakeholders.
- Overall responsibility for implementing the worker grievance mechanism for their staff. This includes distribution of grievance disclosure sheets, collection of grievance forms, updating grievance log sheets, filling resolution form and grievance close-out forms.
- Coordinate with EPC team / overview of implementation of the EPC Contractor requirements related to SEP and worker grievance mechanism.

EPC Contractor / Project Operator

EPC Contractor will be required to assign a qualified Community Liaison Officer (CLO) that will have the following roles and responsibilities:

- Implementing the requirements of the stakeholder engagement strategy as applicable and as identified under 'Chapters 6, 7, and 8'
- Submission of proof of completion of required engagements to Developer CLO
- Overall responsibility for implementing the worker grievance mechanism for their staff and subcontractors(s). This includes distribution of grievance disclosure sheets, collection of grievance forms, updating grievance log sheets, filling resolution form and grievance close-out forms.
- Dissemination of the Worker Grievance Mechanism
 - At the Start of Construction:
 - The Developer will include clear requirements for implementing the WGM in all contracts with the EPC contractor and any subcontractors. These requirements will outline the mechanism's structure, accessibility, and timelines for addressing grievances.
 - The Developer will conduct an initial orientation session with the EPC contractor and subcontractors to explain the WGM process, highlighting its significance in maintaining compliance with project standards and international best practices.
 - Throughout the Construction Phase:
 - The Developer will ensure periodic reminders and updates are provided through contractor meetings, toolbox talks, and other communication channels.
 - The Developer will require contractors to display WGM materials (posters, leaflets) in prominent, worker-accessible locations on-site and provide training sessions for new workers and managers joining the project.
 - Monitoring Contractor Compliance

The Developer will establish a structured monitoring framework to ensure contractor compliance, including the following measures:

 - Monthly Compliance Reports: Contractors will be required to submit monthly reports detailing grievance submissions, resolutions, and response timelines.
 - Site Inspections: Regular on-site audits will be conducted by the Developer to assess the accessibility and effectiveness of the WGM, including interviews with workers to verify their awareness and satisfaction with the mechanism.
 - Independent Review: The Developer will arrange for periodic independent reviews of the WGM to ensure it remains robust and responsive to worker concerns.

- Non-Compliance Measures

- Any deviations or non-compliance identified through monitoring will result in corrective actions, including formal warnings, additional training sessions, or contract amendments as necessary.
- These detailed steps will ensure that the WGM is effectively disseminated and implemented across all project contractors and monitored throughout the construction phase, aligning with the project's commitment to worker welfare and grievance resolution.

Developer will require EPC Contractor and all contractors or subcontractors to implement the grievance mechanism for their respective employees and will also monitor its implementation to ensure compliance. Similarly, EPC Contractor and subcontractors are required to maintain grievance forms, grievance closeout forms and grievance log sheet onsite at all times. These must be provided to the CLO on a monthly basis.

Note: The EPC Contractor and subcontractors(s) will have no role in implementation of the stakeholder grievance mechanism. Any complaints received directly or indirectly by any EPC or subcontractor staff shall be redirected to the Scatec CLO.

10. ANNEXES

10.1 Annex 1 – Public Grievance Form

PUBLIC GRIEVANCE FORM

Reference No.	
Full Name: <i>(Anonymous submission is allowed)</i> <i>Note: in case of 'anonymous' at least record age and sex for reporting purposes.</i>	
Contact Information Please mark how you wish to be contacted and add contact details	<input type="checkbox"/> By Post: <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail: <input type="checkbox"/> Other (please specify)
Description of Concern, Incident or Grievance	What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of concern, incident, or 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:	

10.2 Annex 2 – Public Grievance Log Sheet

[illegible]

10.3 Annex 3 – Public Grievance Close Out Form

PUBLIC GRIEVANCE CLOSE OUT FORM

How was grievance received	
Reference No:	
Description of Concern, Incident or Grievance: <i>What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>	
Date of Grievance	
Has the Grievance been Resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No; <i><u>If not provide a justification below</u></i>
<u>Fill Out Either Section 1 OR Section 2 below</u>	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	

CLO:

Signature:

Date:

10.4 Annex 4 – Project Stakeholder Register Form

Stakeholder			Importance and Priority Contact									Expectations	Communication Methods and Tools	Timeframe	Responsibility
#	Name, position, group, etc.	Role	Level of Interest			Ability to Influence			Priority						
			Low	Medium	High	Low	Medium	High	Low	Medium	High				

10.5 Annex 5 – Project Handout

10.6 Annex 6: Worker Grievance Form

WORKER GRIEVANCE FORM	
Reference No:	
Full Name <i>*Leave this section blank if you would like to submit anonymously</i>	
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Telephone _____ <input type="checkbox"/> By E-mail _____
Description of Concern, Incident or Grievance:	
What is your concern/grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Concern/ 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: _____

10.7 Annex 7: Worker Grievance Close-Out Form

WORKER GRIEVANCE CLOSE-OUT FORM

Reference No:	
Full Name	
Description of Concern, Incident or Grievance:	
Description of Actions Taken to Resolve the Grievance	
Date of Submission of Grievance	
Date of Communication of Solution to Grievance	
Has the grievance been resolved (Yes/No)	

CLO

Name:

Date:

Signature:

Complainant

Name:

Date:

Signature

10.8 Annex 8: Worker Grievance Log Sheet

Ref No.	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why

10.9 Annex 9: Channels of communication that will be used to announce the 'ESIA Public Consultation Session'

The list of invitees will be determined jointly by the developer and RCREEE in coordination with the ESIA consultant, and will include the headquarters of the Environmental Affairs Agency (EEAA) and its regional branch, the New and Renewable Energy Authority (NREA), the Red Sea Governorate, other government entities, Ras Ghareb City Council, the National Council for Women, local community representatives, NGOs, and various local community groups.

In coordination with the ESIA consultant, invitees will be notified of the date and location of the public consultation session. Participants will be invited through:

- Printed invitations and the executive summary will be sent by the ESIA consultant to stakeholders in the governorate, NGOs, and local community representatives by hand, fax, and email
- Invitations by RCREEE via email
- Telephone calls by the ESIA consultant
- Announcement in an official daily newspaper including the project title, date, and location of the session.