

Scatec

# Stakeholders Engagement Plan For Project Obelisk PV and BESS – Nagaa Hammadi

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## 1. Introduction

The primary objective of the Stakeholder Engagement Plan (SEP) is to ensure that stakeholders are informed, consulted, and actively involved in the decision-making process for the project. The nature, frequency, and depth of stakeholder consultation and engagement varies considerably across projects and their phases and should be commensurate with the project's risks and adverse impacts, and the level of interest of potential stakeholders.

In the above context, this document constitutes a Stakeholder Engagement Plan (SEP) to be implemented by project throughout its planning, construction, and operation phase.

To meet requirements of international standards<sup>1</sup> the 'good practice principles' identified by the EBRD PR 10, and Egyptian legislation the key principles of this preliminary SEP include:

- Disclose early – provide relevant information to targeted stakeholders in advance of decision-making.
- Design disclosure to support consultation – give potentially affected communities and/or stakeholders adequate information to allow them to participate in an informed manner.
- Provide meaningful information – ensure information provided is in a format and language that is readily understandable and tailored to the target stakeholder group so they can reach informed conclusions and provide informed input.
- Ensure the accessibility of information – ensure the intended recipient will most readily receive and comprehend the information through considering what information different stakeholders require, the format and how a stakeholder group is best engaged.

The engagement of stakeholders is an ongoing process which involves public disclosure of appropriate information, meaningful consultation with stakeholders. The process of stakeholder engagement will begin at the earliest stage of project planning and continue throughout the life of the project. Moreover, it will also outline a grievance redress mechanism (GRM) by which stakeholders can communicate concerns to the project and be assured they will be addressed.

In general, it will be developed in the following phases:

- **Previous Stakeholders Engagement during the Preparation of the Project's ESIA**

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<sup>1</sup> Specifically, World Bank Environmental and Social Standard 10 (Information Disclosure and Stakeholder Engagement) and IFC Performance Standard 1 (Assessment and Management of Environmental and Social Risks and Impacts)

This stage outlines how stakeholders relevant to project have been identified and engaged. It captured the findings of the stakeholders consultation and engagement during the ESIA preparation. It highlights the process and outputs and, the contributions of stakeholders to the ESIA preparation.

Within the above context, the approach and methodology for the stakeholders' engagement at this stage were guided by the general objectives of the ESIA, namely to:

- Confirm that the scoping analysis exhaustively addressed the Area of Influence and potential impacts.
- Identify potential stakeholders and their potential interest.
- Better understand the interest and influence of stakeholders and whether the important stakeholders are all accounted for.
- Determine potential additional stakeholders as well as their potential inputs to the ESIA and SEP in subsequent phases.
- Identify the potential environmental and social impacts that are of most interest and concern to stakeholders to ensure they are fully assessed in the ESIA.

Copies of the ESIA study and executive summary are made available for public review in the information center of Qena Governorate building.

- **SEP during project implementation**

This stage will outline how stakeholders relevant to project will be updated and engaged. It will also define stakeholder engagement methods for the Project including recommended communication channels, key messages, steps for the establishment of an open dialogue with relevant stakeholders, proactive approaches necessary for specific stakeholders and participation of potentially affected communities as per international standards.

## 2. Project Description

Scatec is planning to establish a 1GWac solar power generation project, including a 100mW/200MWh Battery Energy Storage System (BESS), in the Nagaa Hammadi area. This project aims to deliver the generated power to the national grid.

The project site spans approximately 3888 Feddan in an undeveloped desert area, located about 0.5 kilometers west of the Hiw light industrial zone in Nagaa Hammadi. The nearest residential area is approximately 5.6 km away north of the site as well as a number of reclaimed agricultural lands. The Giza-Luxor Road is 3 km to the north. The site can be accessed *via* a paved road approximately 0.5 km to the east of the site. Figure 1 below shows the activities/land uses surrounding the proposed site.

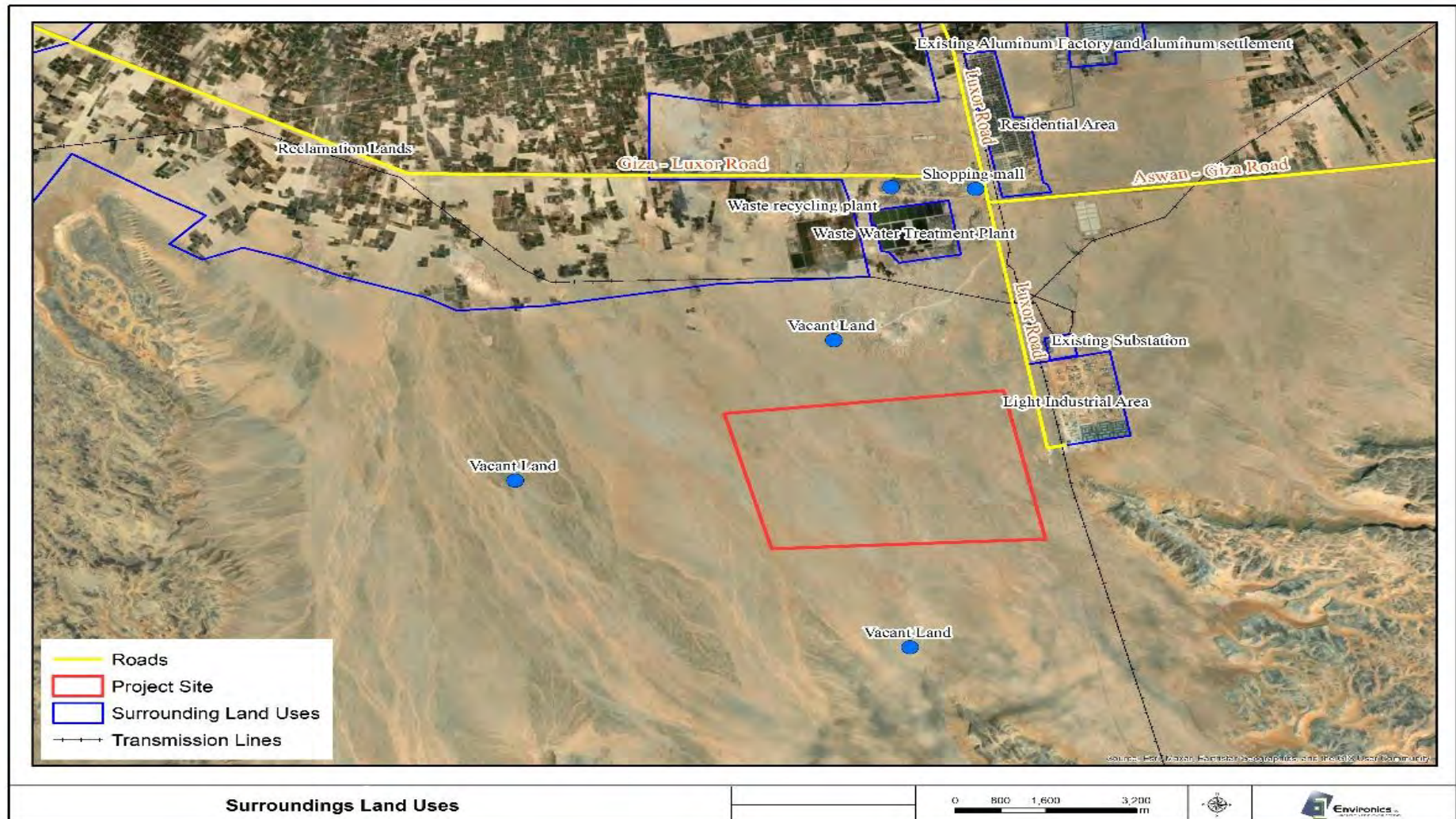


Figure 1: Location and surrounding activities of the project site

In February 2025, the Project land area changed. The previous project land area was approximately 3888 feddan (~16.3km<sup>2</sup>), to which an additional ~4km<sup>2</sup> have been added<sup>2</sup> to become ~4800 feddans (~20.2 km<sup>2</sup>). The whole land area, including its extension, is located within an undeveloped desert area, at about 162 meters west of the road serving Hiw light industrial zone in Nagaa Hammadi, which also provides access to the project site.

The extension of the project area does not change its relation to the surrounding land uses/receptors. The nearest residential area as well as a number of reclaimed agricultural lands are still approximately 4.7 km away north of the site and the Giza-Luxor Road is 4 km to its north.

Figure 2 below presents the land area modifications.

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<sup>2</sup> The 4km<sup>2</sup> has been requested for and are in advanced stages of finalization with NREA.

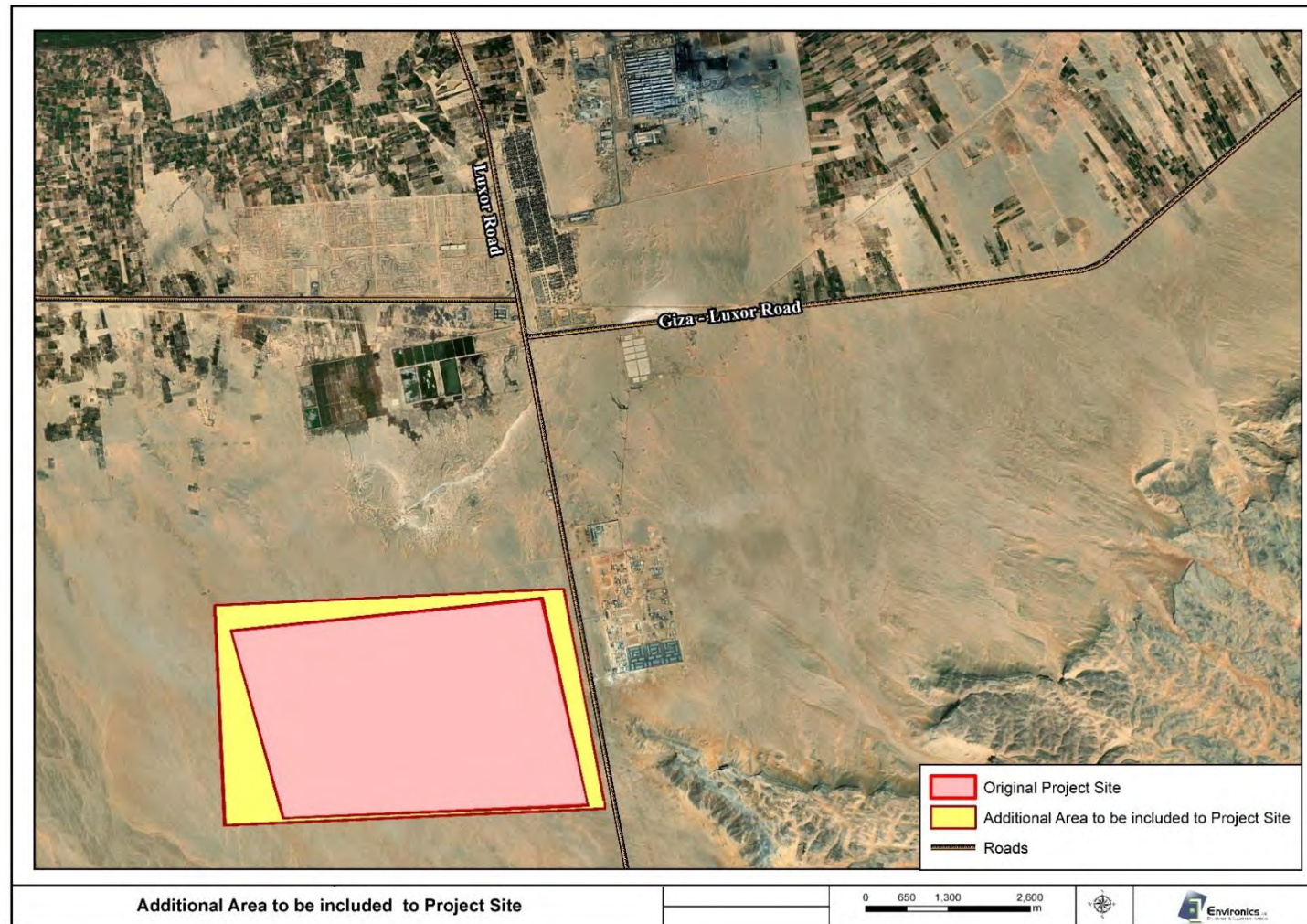


Figure 2: Project land area modifications

## 2.1 General Outline

The Photovoltaic Power Plant will utilize high-efficiency mono-crystalline silicon solar panels along with single-axis tracking systems (horizontal single axis tracker -1P Dual Row) to maximize energy capture. Additionally, a BESS using lithium-ion battery modules will be integrated to store and manage the generated energy.

The project will be connected to the national grid through an overhead transmission line (OHTL) to be constructed by the Egyptian Electricity Transmission Company (EETC) and to connect to existing substations.

## 2.2 Project Components

### a) Component 1: Solar field Photovoltaic modules: High-efficiency mono-crystalline silicon solar panels

- **Solar Panels**

PV Plant using 1,620,750 photovoltaic modules, each with a peak power output of 710 watts. These modules are known for their high efficiency and bifacial technology, which allows them to generate electricity from both sides, maximizing energy production.

Mono-crystalline silicon PV panels will be connected in series to produce DC output from incident irradiance. The Key design parameters include the orientation and tilt angle, and shading from surrounding obstructions.

- **Mounting structures**

For optimal performance, PV systems aim to maximize the time they face the sun. In static mounted systems modules are often set to latitude tilt, an angle equal to the latitude. To continuously orient the panels towards the sun, the project will adopt a single-axis horizontal tracking system.

PV modules will be installed at a single-axis horizontal tracking system that has a maximum height of approx. 105 m at -60°/+60° turning angle range. The following table describes the PV module.

**Table 1: Module Description (1000MWac/ 1150MWp)**

No	Item Description	Unit	Total Qty for 1000MWac
	PV Modules (710Wp)	Nos	1 620 750
	Substructure –Tracker	Tables	18007 (3/2 strings per table)

	No. of PV Module per table	Module	90/60
	Inverter	Nos	3975
	No. of blocks/ MV transformer station	Nos	133
	Technology	----	Bifacial
	BESS Container	Nos	48
	220/33kV Pooling Substation (4 X 250 MVA Power transformers)		

The PV arrays will be spaced appropriately, considering local topographic conditions. This spacing is designed to minimize shading effects and optimize solar exposure, ensuring maximum efficiency and environmental compatibility.

- **Inverter systems**

Inverter systems are used for converting the direct current (DC) generated by photovoltaic modules into alternating current (AC) and can be fed into the grid. The components of the inverter system are as follows:

- **Inverters**

The project will utilize 3,975 inverters to convert the DC generated by the photovoltaic modules into AC for use in the power grid. These inverters will handle the conversion process, ensuring efficient energy transmission. The project will employ inverters with a total capacity of 1,131 MVA, and approximately 80 MVar of reactive power will be supplied by the BESS.

- **Switchgear**

The electrical equipment used to manage and protect the medium voltage (33kV) circuits before the voltage is stepped up to 220kV for transmission. This switchgear is crucial for ensuring the safe and efficient operation of the electrical system within the substation.

## **b) Component 2: BESS**

A Solid-State Battery consists of multiple battery cells assembled into modules. Each cell contains a positive electrode, a negative electrode, and an electrolyte. The lithium-ion BESS primarily use lithium nickel manganese cobalt oxide (NMC) or lithium iron phosphate (LFP) for their cathodes.

The BESS will comprise multiple battery units or modules housed in shipping containers or suitable housing structures, delivered pre-assembled to the

project site. These containers are typically elevated slightly off the ground and arranged in rows.

Supplementary infrastructure and equipment include temperature control equipment, which may be positioned between the battery containers. The solid-state batteries under consideration are Lithium-ion systems. Figure 3 illustrates the BESS.

### **Key Components of the BESS**

#### **1. Battery Modules**

- The core of the BESS, typically lithium-ion batteries with a designed capacity of 205 MWh and a dispatchable capacity of 100MWac/200MWh AC-coupled BESS, with no augmentation (degrades over the project lifetime)
- Connected in series and parallel to achieve the required capacity.
- Housed in weatherproof, insulated containers to protect from environmental conditions.
- BESS is designed to operate on only one full cycle per day. Once the BESS is charged to 100% State of Charge (SoC), it will accommodate Ancillary Services and load shifting. However, upon the first measurement of 0% SoC, all services will be suspended for the remainder of the day.
- The BESS can store energy and then release it during the specified time frame of 7 pm to 9 pm, depending on how much of its capacity is allocated for Ancillary Services. Ancillary Services are essential for maintaining the stability and reliability of the power grid.

#### **2. Battery Management System (BMS)**

The BMS is an essential component of the battery-based energy storage system. This system aims to monitor and manage the performance of batteries to ensure they operate efficiently and safely. Some of the main tasks performed by the BMS include:

- Voltage and Current Monitoring: to ensure they operate within safe limits.
- Charge Balancing: ensures balanced charging among all cells in the battery, which helps improve performance and extend battery life.
- Temperature Monitoring: The BMS monitors the battery temperatures and activates cooling or heating systems as needed to maintain optimal temperatures.
- Protection system: It protects against abnormal conditions such as overcharging, over-discharging, and short circuits.
- Diagnostics and Maintenance: The BMS provides regular reports on the battery status and helps detect potential faults before they cause significant problems.

### 3. Cooling and Ventilation Systems

Batteries generate heat during charging and discharging. Cooling systems ensure that the temperature remains within safe limits to prevent overheating, which could degrade battery performance or even cause fires. They use liquid-cooled temperature control system to optimize the auxiliary power consumption for fans required to circulate air, to absorb heat from the batteries.

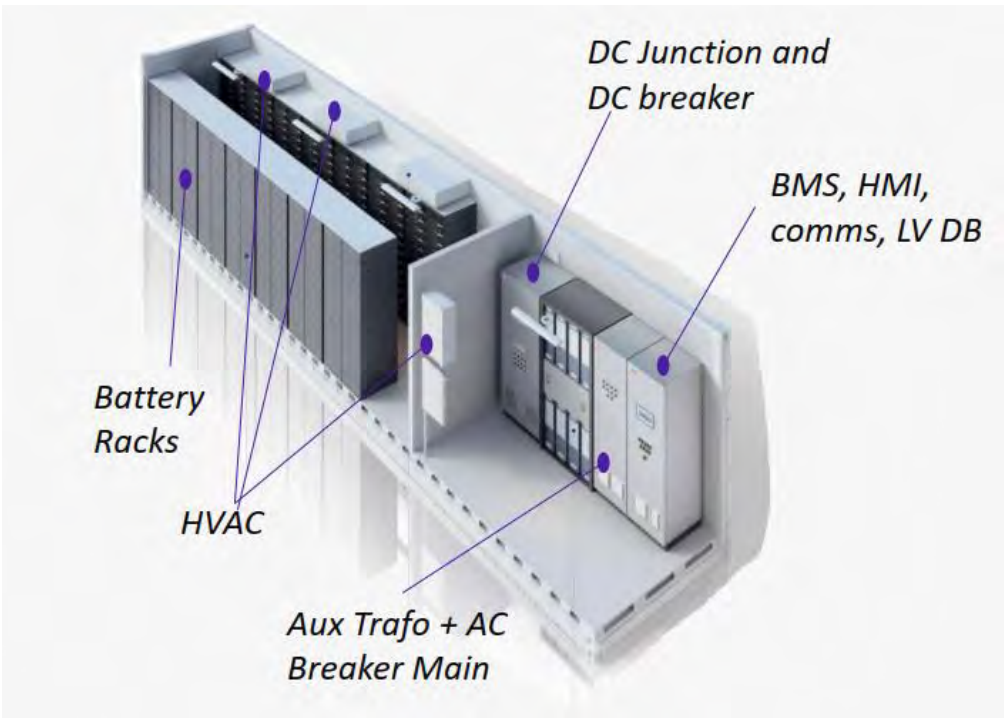
### 4. Control and Monitoring Systems

- Provides real-time data on the performance of the BESS.
- Components include SCADA systems, sensors, and communication interfaces.

### 5. Auxiliary Systems

- Includes lighting, emergency power supplies, and fire suppression systems.
- Supports the safe and reliable operation of the BESS.







**Figure 3: Battery Energy Storage System (BESS)**

The installation of the BESS for the proposed project will adhere to the following standards and regulations:

- NFPA 855: Ensuring installations are performed appropriately with vital life safety considerations.
- ISO 45001: Emphasizing occupational health and safety management.
- EN 62485-2: Covering safety requirements for secondary batteries and battery installations.
- Local Building and Fire Codes: Complying with local regulations for safety and construction.

### c) Component 3: Connection to the grid

#### **33kV/220kV Pooling Substation**

A 33/220kV pooling substation has 4 transformers, each with a capacity of 250 megavolt-amperes (MVA) to step up the voltage from 33kV to 220kV for efficient long-distance transmission. It integrates renewable energy into the grid, ensuring reliability and reducing energy losses. Key components include switchgear, circuit breakers, and Power System Stabilizer (PSS). For electrical insulation, current interruption and arc quenching in the transmission and distribution systems, SF6 gas and Air insulations are typically used in electric power systems, where SF6 the mostly used insulation material.

An internal 33kV medium voltage (MV) overhead transmission line (OHTL) corridor will be constructed within the project land area through which the output power of the MV Inverter Transformer Stations will be transmitted via an intermediate MV collector unit to the 220/33kV HV substation.

The internal 33kV OHTL lines will extend over a span of approx. 5km and is supported on towers of approx. height of 28m (with a possibility to reach 34m max.) along west to east through the middle of the overall project land. The OHTL's electrical design shall meet the IEC 60850 (Nominal voltage ratings) and other relevant IEC standards to ensure correct conductor selection, insulation, and voltage regulation in line with Egyptian Grid Code local regulations, EETC standard design/ drawings and IEC standards. The design shall include the OPGW circuits along with all the junction and splice boxes.

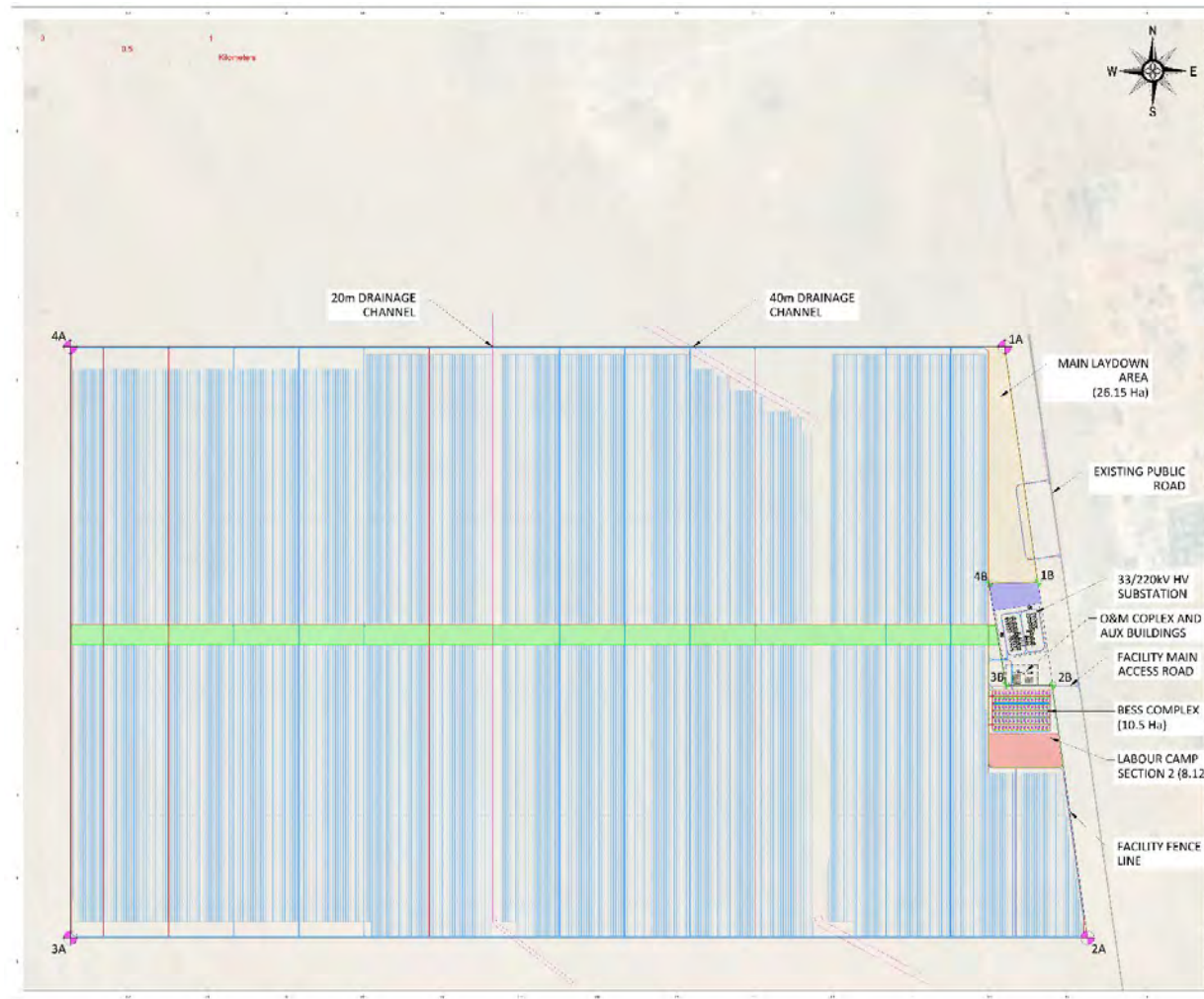


Figure 4: Layout of the project

## 2.3 Construction Phase

### 2.3.1 Project Schedule

According to the proposed timeframe, the project will be completed in September 2026 upon obtaining all the necessary permits and approvals, starting February 2025. The construction works including site facilities, civil, electrical, and mechanical works are expected to take about 17 months. Different phases of the Project are illustrated in Figure 5.

### 2.3.2 Description of Construction Phase

Major on-site activities will include civil works, construction of buildings, installation of equipment and utilities, and testing and commissioning of equipment.

- Site preparation and clearing:  
Site survey and geotechnical investigations are conducted to prepare the site for construction.
  - Clearing the site of rocks, levelling the ground
  - Warehouse and temporary storage area preparation
  - Concrete works
  - Water and sewage pipes
  - Establish laydown areas for equipment and materials
- Construction of panels and access roads
  - It is anticipated that PV poles will be either directly rammed or predrilled in case of harder layers of soil/ gravel beneath to fix them on the ground. Based on the initial geotechnical studies the site, there would be a decent mix of both the cases in the project.
  - Construction of access road connected to existing tarmac/asphalt road running from the highway to industrial/business area east of the PV plant area. Length: Approximately 500 m
  - Internal roads for handling construction equipment (construction material: tar or gravel) and operation activities
  - Roads of the solar field will consist of compacted site material and gravel capable of support of the transit loads during construction and operation.
- Storm water and site drainage system
  - Several ephemeral drainage lines (wadis) crossing the site. Concept design includes diversion of most severe streams crossing the site with constructed channels. The inlet and outlet for these channels require to be established outside of the PV project area. Design will ensure that

the downstream discharge, velocity and energy shall not impact the natural drainage of the area.

- Fencing and gates  
Perimeter fencing with main gates and emergency gates enclosing entire project area. Also, the HV substation area and O&M building shall be separately fenced for improved security and safety reasons.



Figure 5: General Stages of PV Project Construction

3. Associated Facilities: Overhead Transmission line (OHTL)

An overhead transmission line (OHTL) will be constructed by EETC to connect the project to the national grid through the existing Nagaa Hammadi substation. The proposed OHTL route runs parallel to the Nagaa Hammadi industrial zone, east of the project site, heading north, crossing the Giza–Luxor Road. It connects to an existing OHTL traversing the buffer area between El Baraka village residential area and the Aluminium Complex, located to the north of the site. The existing OHTL also traverses reclaimed agricultural lands to ultimately reach the Nagaa Hammadi substation north of the farmlands. As illustrated in Figure 5 below show the proposed OHTL route.

For the points from 1 to 5 crossing the farmlands and bordering El Baraka village from the east, no new towers will be built, only cables and conductors will be installed on the existing towers at this segment. Transmission towers will be constructed from point 5 southwards to the Project’s substation. This segment, south of point 5, representing the majority of the proposed OHTL route, is located within empty publicly owned desert land.

According to the national laws, the construction, operation and maintenance of OHTLs are within the scope of responsibility of the Egyptian Electricity Transmission Company (OHTL). In this respect, a separate ESIA for the OHTL is

to be prepared by EETC and submitted to the EEAA for approval. In addition, a separate SEP will be developed for the OHTL by EETC.

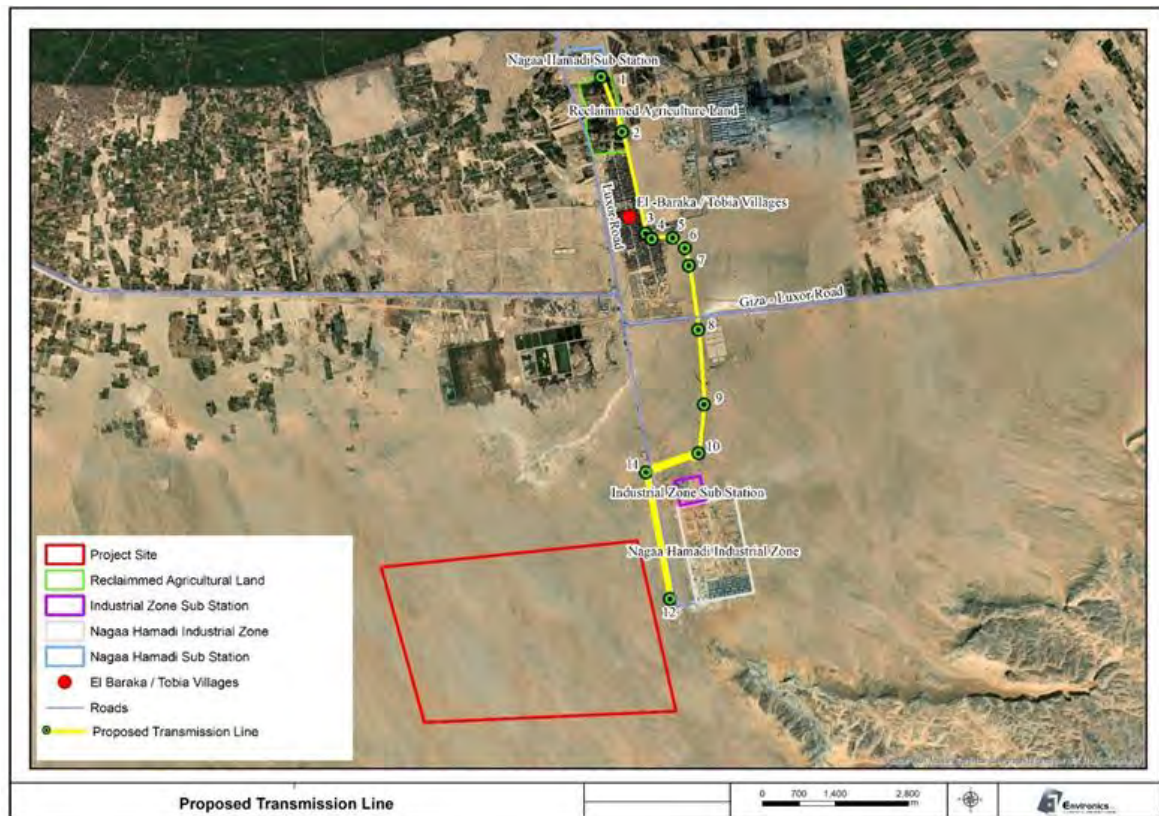


Figure 6: Proposed OHTL route

#### 4. Overview of Potential Environmental and Social Impacts

Potential environmental and social impacts of the construction and operation of PV power plants are shown in Table 2.

Table 2: Potential Receptors and Impacts

E&S Aspect	Potential Receptors	Potential impact
<b>Construction Phase</b>		
Dust/Particulate Matter/Gaseous Emissions	Ambient air, workers and adjacent communities, if any	Impacts from levelling, excavation and backfilling activities from construction vehicles machinery as well as use of transportation vehicles to transport the PV panels and other components equipment and construction materials.
Noise and vibrations	Workers	Potential impacts during construction. Noise and vibration during construction might be a source of annoyance to the neighboring industrial area. <u>It is noted that there are no residential communities near the project site.</u> the closest communities is the industrial area east of the site.
Water Resource Requirements	Water resources, trucking from nearest	Water requirements for the construction phase is about 80-100m3/day and could be met by the existing water

E&S Aspect	Potential Receptors	Potential impact
	water plants)	treatment capacity.
Wastewater Generation	Soil and groundwater	Sanitary water from workers, gray water from accommodations and kitchens, Improper management may cause impact on soil However, the depth of the groundwater would make it highly unlikely to be impacted.
Solid waste generation	Workplace, workers and soil	Improper handling and management may have an impact on workplaces and workers as well as potential soil contamination as result of spills and leaks, and also could attract stray animals
Hazardous waste generation	Workplace, workers and soil	Improper handling and management may have impact on workplace and workers as well as potential soil contamination as result of spills and leaks.
Habitat Loss	Desert habitat	Habitat loss, modification, and fragmentation during the installation of PV panels and construction of utilities, the soil nature and topographic structure of the area will change leading to a modification of the desert habitat from natural to modified due to constructions and potential soil levelling activities
Wildlife Disturbance	Fauna and avifauna	During the construction phase, air emissions, noise and vibrations, light emissions, as well as a relatively large human presence, may affect local wildlife. These stressors may drive fauna away from the site, which area is , however, considered to be very limited. Heavy machinery may lead to soil compaction and destroy dens and burrows (if any), thus affecting fossorial species. Increased traffic may slightly increment animal road-kills. On the other hand, migratory avifauna is not expected to be affected as there is no correlation between the airspace utilized by avifauna and the terrestrial area of the site, which does not provide any resources in terms of resting and feeding areas.
Increased Transportation Demand	Communities along the transport route	Transport of PV components from port(s), will be considerable, which can affect the roads, the road users and communities along the transport routes in addition to potential accidents.
Workers Influx	Workers, nearest communities	A number of workers may put pressure the resources of the nearest communities. In addition inadequate temporary accommodation may have impacts on the workers' welfare.
Land Use	Landowners within footprint of associated facility – EETC transmission line	The upgrade of EETC's already exiting OHTL within privately held land may impact landowner crops as a result of equipment and machinery use.
<b>Operation Phase</b>		
Dust/Particulate Matter/Gaseous Emissions	Occupational work environment	Very limited emissions potentially resulting from on-site movements for maintenance activities
Water Resource Requirements	Water resources trucking from nearest water plants)	Expected to be limited for domestic purposes due to small number of operation workers.
Wastewater Generation	Soil and groundwater	Although of limited quantities due to small number of

E&S Aspect	Potential Receptors	Potential impact
		operation workers, yet if improperly managed may have potential impact on soil but unlikely ground water, due to its depth and the limited generated volume.
Solid waste generation	Workplace, workers and soil	Although of limited quantities due to small number of operation workers, if improperly managed, wastes may have potential impact on soil and as well as potentially attract stray animals.
Hazardous waste generation	Workplace, workers and soil	Although of limited quantities (except of Li-batteries at their end of life) resulting from maintenance activities, yet if improperly manages may have potential impact on soil
Glint	Changes in landscape appearance	No visual impacts are expected on the neighboring environment since there are no sensitive residential communities within the vicinity
Bird Collision and/or Electrocution with Project OHTL	Avifauna	Transmission lines present physical barriers to bird movement potentially resulting in collision risks especially in low-visibility conditions. Collision mostly takes place with the thinner and less visible ground wires. Larger, heavier species are more prone to collisions as a result of limited maneuverability. Electrocution may occur by contact between a conductor and an earthed metallic structure (either the crossarm or an earth wire) but can also occur by contact between two conductors. Large birds with extensive wingspans are more vulnerable as they have a higher likelihood of making contact with conductors when perched and opening wings.
Bird Collision and/or Electrocution with Associated Facility (i.e., OHTL to be constructed and operated by EETC)	Avifauna	Same as above.

## 5. Regulatory Framework

### 5.1 National Regulations

According to the national EIA guidelines, issued by EEAA in 2010, the public consultation and disclosure takes place with focus on the environmental and social aspects related to the project and does not address the political or economic aspects or any other aspects not to be addressed in the ESIA.

#### 5.1.1 Stakeholders Engagement Methodology

##### *i) Public Consultation during ESIA Scoping*

As per the national EIA guidelines, the stakeholders consultation is to be undertaken twice during the ESIA preparation process for Category C projects (Category A according to international systems). The ESIA scoping phase aims to agree on the aspects and impacts that will be addressed and analysed in the ESIA study. Stakeholders' meetings will be held with each concerned party individually or can take the form of a unified meeting where the concerned parties are invited to attend the meeting together. The scoping stage is to result in:

- Obtaining the opinion of the concerned parties regarding the environmental and social aspects to be addressed by the project ESIA
- Indicate if there is a need to address additional E&S issues in the ESIA
- Identify additional concerned parties to be consulted, if any

##### *ii) ESIA disclosure*

After the draft ESIA is prepared and before its submission to the environmental authority, the ESIA disclosure is to take place<sup>3</sup>. The aim of disclosure is to present the result of the ESIA to the concerned parties with the opportunity to be reassured that their relevant concerns, raised during the scoping stage, have been addressed in the ESIA, as relevant, and to be comfortable with the proposed mitigation measures.

According to the national system, the disclosure meeting is to be held in a form of a unified meeting (a public hearing session) to which the representatives of all concerned parties are to be invited, and as a minimum those who have participated in the scoping stage. These include:

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<sup>3</sup> Other lower category projects are not required undertake public disclosure meetings

- Representatives of the EEAA
- Related government authorities
- Representatives of the Governorate and local units where the project is located
- Representative of affected groups including local businesses and communities, NGOs and civil society groups (as relevant to the project location, type and resulting impacts)
- Media representatives

### iii) *Continuous Engagement*

The EIA guidelines emphasise on the importance of continual consultation/engagement with the surrounding community. It, however, does not specify/recommend the means for engagement.

## 5.2 International Standards

Stakeholder engagement is a critical component of international Lender standards. The European Bank for Reconstruction and Development Performance Requirement EBRD PR 10 focuses on information disclosure and stakeholder engagement. It aims to ensure that EBRD-financed projects are transparent and that affected communities are informed, consulted, and involved in decision-making processes throughout the project cycle. PR10 requires meaningful consultation, based on the nature and scale of the project's adverse risks and impacts and the level of stakeholder interest.

In addition, the AfDB has identified key underlying principles for stakeholders participation and engagement <sup>4</sup> Similarly, the International Finance Corporation (IFC) as well as the DFC<sup>5</sup> recognizes the importance of stakeholder engagement as the basis for building strong, constructive, and responsive relationships essential for the successful management of a project's environmental and social impacts.

The World Bank and IFC<sup>6</sup> have identified five steps for iterative consultation as follows:

- ***Planned ahead:*** Before beginning a stakeholder consultation process, it is useful to think about who needs to be consulted, over what topics, and for what purpose.
- ***Consulting using basic principles of good practice:*** depending on the project context, good practice consultation should start early in the process, be targeted, informed and meaningful, localized and two-ways, gender inclusive and documented.

<sup>4</sup> HANDBOOK ON STAKEHOLDER CONSULTATION AND PARTICIPATION IN ADB OPERATIONS

<sup>5</sup> the Environmental and Social Policy and Procedures (ESPP) of the US International Development Finance Corporation (DFC) apply the E&S Performance Standards of the IFC

<sup>6</sup> World Bank Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, <https://www.ifc.org/content/dam/ifc/doc/mgrt/ifc-stakeholderengagement1.pdf>

- **Incorporated feedback:** feedback received during the consultation process to be taken seriously and making best efforts to address issues raised through changes to project design
- **Documented:** documentation of the consultation activities and their outcomes is critical to effectively managing the stakeholder engagement process
- **Reporting back:** to follow up with consulted stakeholders regarding actions taken and next the steps.

## 6. Social Context of the Project Area

Key social aspects are summarised as follows:

- **Population:** the proposed project site is located within the desert hinterland of the city and Markaz Nagaa Hammadi - Qena governorate. There are no human settlements or local communities within or near the Project Site, the nearest settlements are located at about 5.6km north of the project site. The Hiw light industries zone is located at 0.5km east of the site. The site is located around 15 km southeast of the town of Nagaa Hammadi. There are no other nearby cities or settlements near the project site. In Markaz Nagaa Hammadi, the total population is about 578,237, with males accounting for 51.07% (295,357) and females 48.92% (282,880). The nearest community to the proposed project site is Hew village aving population of about 200,000 inhabitants.
- **Labour Education:** Significant number of the population of Qena governorate are seen in the Technical Intermediate education level. University education also has significant numbers. In Markaz Nagaa Hammadi the Technical Intermediate category again shows the high numbers followed by University education.
- **Employment:** In Qena, the total workers across all occupations are 927,108. In Markaz Nagaa Hammadi, the total workers across all occupations is 182,451. In both Qena and Nagaa Hammadi, males predominantly occupy roles in elementary occupations<sup>7</sup>, plant and machine operations, and skilled occupations while females are more concentrated in service and sales, as well as clerical support roles.
- **Health facilities:** Qena governorate has a highly accessible network of healthcare infrastructure, with at least 30 hospitals. In addition, the governorate has emergency services and is served by numerous emergency healthcare facilities. Two healthcare units and one ambulance service unit exist near the proposed project area within Hew and El Baraka villages at a distance of approximately 12km and 10km respectively.as well as one hospital (Aluminum hospital) north of the proposed project site
- **Infrastructure:** The Giza - Luxor Road passes approximately 3 km north of the project site, this road connects Qena and Nagaa Hammadi cities to the project site, this road consists of two separate lanes, each of approximately 10 meters wide.

<sup>7</sup> Simple and routine tasks which mainly require the use of hand- held tools and often some physical effort

- **Drinking water:** 99.58% of the governorate urban areas population is connected to the public network, while the remaining 0.42% uses groundwater wells. In rural areas about 95.92% of the population is connected to the public network, and the remaining 4.08% use groundwater wells. Within the governorate plans, expansions are underway to increase the capacity of the water treatment plants at Nagaa Hammadi.
- **Sewage:** About 15.47% of Qena governorate population is connected to public networks, while 2.01% of households use private networks. A significant 82.14% rely on cesspits, 0.35% use open field and other methods. In urban regions, about 63.97% are connected to public networks with, and 1.5% use private networks. Since the census of 2017, the government program “Hayah Karima” has invested in multiple wastewater projects in Qena Governorate and it is, therefore, expected that the percentage of household connected to the public network has currently substantially increased.
- **Cultural heritage:** There are no registered antiquities or cultural heritage sites in the vicinity of the project site based on the Egyptian Archeological Map (2022) and the UNESCO World Heritage List of Egypt.

## 7. Stakeholder Identification

This section describes the stakeholder groups identified to date, including those identified for future engagement. Stakeholder identification will be an ongoing process, requiring review and update. This section elaborates in detail the approach for engagement with identified stakeholder groups.

The Project’s Area of Influence (AoI)<sup>8</sup>, associated infrastructure, the extent of the anticipated impacts, and the areas potentially affected by the induced and cumulative impacts of the Project were considered to identify stakeholders comprehensively. Stakeholder groups can broadly be divided into stakeholders who:

- May be directly and/or indirectly affected by the project.
- May have an interest in the project or the areas that may be affected.
- Have the potential to influence project outcomes or operations.

In general, primary stakeholders are those who will be directly affected, positively or negatively by a development. These would, in particular, include poor and marginalized groups who have traditionally been excluded from participating in development efforts and outcomes; as well as the local community-based organizations which might represent their interests in the project, and in all cases, can help to access communities in general and these groups in particular.

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<sup>8</sup> AOI is defined based on expected activities during construction and operation phases taking into consideration direct and indirect impacts. However, extended AOI might be applied during the SESA phase based on the results of stakeholders’ consultation

Secondary stakeholders may include agencies, experts, interested parties and anyone able to influence the outcome of the development. These mainly include Central Government, line ministries, local government/authorities, implementing agencies, national and international lending institutions, media, and academic institutions. Secondary stakeholders are important as they provide valuable data and information specific to the area, i.e. they are a source of secondary data.

7.1 Stakeholders’ Analysis

A preliminary stakeholders’ analysis was conducted to assign importance to stakeholders, understand their roles with respect to the project, and help identifying their engagement approach.

The stakeholders can be categorized into the four quadrants shown below.

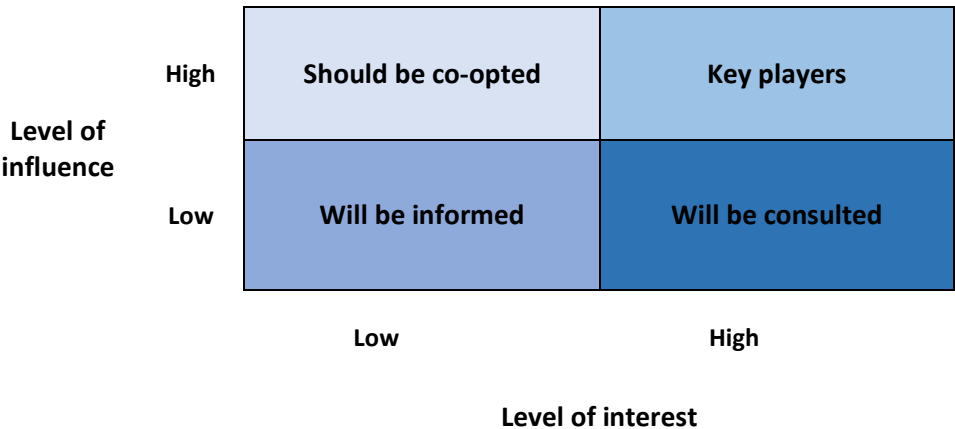


Figure 7: Stakeholders’ categorization

- Stakeholders have been identified considering the following factors:
- Project’s nature and activities;
  - Geographical extension and location of the project; and
  - Environmental and Social aspects and potential impacts of the project

Accordingly, the following preliminary key stakeholder groups have been identified in Table (3) below

Table 3: Stakeholders Groups

Stakeholder Category	Stakeholders	Impact, Influence and Interests
<b>Primary Stakeholders</b>		
Local Businesses & Industry	Small business owners in the nearest cities and towns	Economic interest in the project (providers of goods and services).
Interested organizations	NGOs	National and local, which can provide social context and effective contacts to concerned communities
Local Communities/ residents	Nearest communities to the project site	Provision of workforce, may include key leadership figures of community stakeholders
Workers	Employees of developers and their contractors	Exposure to occupational health and safety risks Economic benefits
<b>Vulnerable groups (specific vulnerable groups will be identified as the Project development proceeds)</b>	women groups, disabled groups, elderly groups, etc..	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.).
<b>Secondary Stakeholders</b>		
National Regulators/ agencies & Permitting Authorities	NREA EEAA EIA,	Includes authorities and agencies responsible for project permitting approvals.
Other relevant agencies	Egyptian Electricity Transmission Company Ministry of Transport (roads and bridges Authority) Ministry of Water Resources and Irrigation	Mostly related to associated facilities without which the project would not exist or properly function, such as transmission lines, roads, water and wastewater treatment facilities
Local Government	Qena Governorates and Nagaa Hammdi city.	The Governorate is of political importance and are home to the primary stakeholder and therefore could have a role in maximizing benefits and/or controlling adverse impacts. They also have a key role in issuing project construction permits as well as supplying utility services and security.
Healthcare Providers and emergency services	Main hospitals and healthcare	Would need to cater to the large workforce attracted by the project
Media	National and local mass media and newspapers	Channel to disseminate information; key public opinion influencers.
<b>Private Landowners</b>	<b>Landowners along existing EETC</b>	<b>Will be impacted by EETC</b>

Stakeholder Category	Stakeholders	Impact, Influence and Interests
	OHTL (i.e., associated facility)	<b>upgrades to existing OHTL within their lands.</b> Crops may be damaged by EETC activities and draw negative attention to project associated facility.

Preliminary stakeholder mapping and categorization is presented in Table (2), and will continue throughout the project life. The table also proposes the engagement method deemed most effective for each stakeholder group, as follows:

- Individual meetings is the method of choice for those organizations characterized by a high influence on the development
- Focus Group discussions are selected to interact with stakeholders characterized by a large number and a relative homogeneity.
- Fact sheets/ leaflets and official correspondence can be used to interact with secondary stakeholders.

**Table 4: Stakeholder Engagement Approach**

Stakeholder Category	Level of Influence	Interest	Approach	Engagement Method
Local Businesses & Industry	Low	High	To be consulted	Focus group discussions
NGOs	Low	Low	To be informed	Focus group discussions
Local Communities residents/ community)	Low	High	To be consulted	Focus group discussions
National Regulators/ agencies & Permitting Authorities	High	Low	To be co-opted	Individual meetings
Agencies overseeing Associated activities	High	High	Key players	Individual meetings
Local Government	High	High	Key players	Individual meetings
Healthcare Providers	Low	Low	To be informed	Fact sheets/ leaflets and official correspondence
Education institutions	Low	Low	To be informed	Fact sheets/ leaflets and official correspondence
Media	Low	Low	To be informed	Focus group discussions
Workers	High	High	Key players	Individual meetings
Vulnerable groups	Low	Low	To be informed	Focus group discussions

## **8. Stakeholder Engagement Process**

As stakeholder engagement is an ongoing process, future engagement activities during the pre-construction and mobilization, construction and operations will ensure that information disclosure and consultation activities are effective and meaningful for all stakeholders over the lifetime of the project.

### **8.1 Previous Consultation during the Scoping and ESIA stages**

Initial stakeholder consultation activities were initiated at the scoping and ESIA stage. Following Table (5) presents a brief summary of the stakeholders consultation activities to date:

Table 5: Summary of the stakeholders consultation activities to date

Stakeholders	Issues discussed
<b>1st October 2024</b>	
Qena Governorate	<ul style="list-style-type: none"> <li>– The meeting included attendees from various relevant governorate/authority entities</li> <li>– The project details, ESIA schedule, and activities.</li> <li>– attended expressed their support to renewable energy projects aiming at pollution prevention and addressing impacts of climate change</li> <li>– Public Disclosure Process takes place usually through the governorate conventional channels, as their social media pages, city council, the local unit centre</li> <li>– Land ownership the governorate confirmed that the project area is State-owned and no risks are perceived in regards to potential land ownership claims</li> <li>– Security requirements Governorate officials assigned from the Ministry of Interior confirmed they shall support the project by supplying all the necessary security requirements including provision of patrolling, a stationary police unit, and ongoing communication with the private security company to be assigned.</li> <li>– Sensitive receptors: none were identified within or nearby the project area</li> <li>– Transportation considerations project does not intersect with the planned high speed-train route.</li> <li>– Local hiring will be maximized during construction and O&amp;M and it has been advised that the local communities possess various resources as construction contractors,</li> <li>– Female leadership opportunity The project team inquired if a female Community Liaison Officer is perceived acceptable and appropriate by the local community, and Governor stated this is highly appreciated and that they shall propose candidates suitable for this position</li> </ul>
Hiw Industrial Area Eng. Mohamed Shabaan – Manager of the Industrial Area	<ul style="list-style-type: none"> <li>– Labour sourcing Hiw village has almost 20,000 residents and is a potential source of various types of labour.</li> <li>– Labour accommodation Engineers could be accommodated in Baraka village that can take up to 5000 persons. Labour could be accommodated in Hiw and Naga Hammadi</li> <li>– Utilities The area is equipped with governmental utilities for domestic wastewater (sewage) reception, electricity connections, and domestic water provision.</li> <li>– Flash floods or heavy rains not witnessed and that he has been in the area for 20-25 years.</li> <li>– Additional stakeholders to consider include the head of Hiw village council, Mohamed Radwan, in regard to understanding community needs, including identifying vulnerable groups</li> <li>– Female leadership opportunity is a positive initiative by the project and shall be effective in identifying any potential issues.</li> </ul>

Stakeholders	Issues discussed
Individual meetings with local farmers North of the Site, Mr. Mohamed Ahmed Yousef Mr. Sayed Abdalla	<ul style="list-style-type: none"> <li>– Local crops include are wheat, corn, alfalfa, tomatoes, onion, and cane</li> <li>– Farm owners expressed their excitement about the establishment of such a nationally significant project and offered their potential support and possible services regarding labour/equipment sourcing and accommodation facilitation.</li> <li>– Groundwater depth is 43 meters, reaching 250 m close to the mountains in the south</li> <li>– Labour sourcing Proposed labour from the Hiw village, followed by El Manasra, and El Batha.</li> <li>– Flash flood potential Farm owners indicated they have not witnessed flash floods, while they were at least 15 years in the area</li> </ul>
Egypt Alumimum - company Dr. Mahmoud Abd El-Alim Agour	<ul style="list-style-type: none"> <li>– Wastewater treatment takes place by utilizing ponds as settling basins. wastewater trucks collect sewage from septic tanks in the villages and sends it for treatment in this area</li> </ul>
workers in Water pumping station: Mr. Hazem Zahran	<ul style="list-style-type: none"> <li>– Water pumping power and capacity pumping power from this station, located 1.5 km to the north from the project site border, is almost 90 liters/second. The current station has a 6000 m3 capacity tank</li> <li>– Community nearby include Hiw willage that has almost 120,000 residents. and can provide labour available for construction works. Local construction contractors are also available for providing services</li> <li>– Accommodation Mr. Zahran stated that El Baraka city south of the EgyptAlum Plant has several available options for rental, along with El Sheikh Ali village.</li> </ul>
farmland owner in vicinity of Naga Hammadi Substation, Farmer: Osman Ahmed	<ul style="list-style-type: none"> <li>– Transmission lines: it was indicated that the overhead lines were established between the Mid 1960s and Mid 1970s; before farming took place</li> <li>– Crops include onions, tomatoes, and cane as they have limited range of crops to grow due to the saline nature of the groundwater</li> </ul>
guard at the new sewage treatment facility, Mr. Hessian Abdel Maguid Abdel Mawgood	<ul style="list-style-type: none"> <li>– Sewage treatment facilities the settling basins north of the project site is serving Egypt Alum and El Baraka city</li> </ul>
<b>23<sup>rd</sup> October, 2024</b>	
light industrial area	<ul style="list-style-type: none"> <li>– the meeting was attended by various representatives of the light industries developer as well as workers from the nearby communities</li> <li>– It is advised to get an external security company and hire persons from the local families as security officers</li> </ul>

Stakeholders	Issues discussed
	<ul style="list-style-type: none"> <li>– The area is subject to days of dusty winds during the spring months of the year – It was advised to plant trees surrounding the facility to reduce impact of wind blown dust</li> <li>– The police and firefighting services are available in the industrial area and their services could be extended to the project, the industrial area lacks an ambulance</li> <li>– There are concerns that leasing, apartment prices and general living costs would increase as a result of influx</li> <li>– Local employment is a keen interest of all attendees in Local job opportunities and provision of supplies</li> <li>– attendees They were also invited to provide other comments to the WhatsApp number and emails provided.</li> <li>– The participants were requested to share the ESIA summary in hand</li> </ul>
Meeting with farmers	<ul style="list-style-type: none"> <li>– Expectations mainly include local job opportunities and provision of supplies</li> <li>– There is no foreseen negative impact from the project. There was no impact from the industrial area (which is at the same distance from the farm) during its construction or operation, The location of the project is far from any communities and no impacts are anticipated</li> </ul>
<b>24<sup>th</sup> October 2024</b>	
Meeting with local women	<ul style="list-style-type: none"> <li>– Meeting took place at the NGO “Hesset-El-Kheir</li> <li>– 42 women participated in two consecutive meetings</li> <li>– Expectations include community investment projects and jobs for local community</li> <li>– NGOs were proposed to be the best option for finding local workers</li> </ul>
Baraka Family Health Unit & Baraka Charity Organization	<ul style="list-style-type: none"> <li>– There are many apartments available for lease in Baraka, more than Nagaa Hammadi</li> <li>– ambulance service located at 1.5 km from the industrial area, and thus the project</li> <li>– Expectations include provision of employment for the local population, Maintain a percentage of workers of special needs according to national laws requirements (National laws determined a 5% percentage)</li> <li>– locals look forward that the project could help improve management of the dump site</li> <li>– Transportation must be provided to workers</li> </ul>

## 8.2 Stakeholders Engagement Plan

The Project will mobilize resources consisting of an E&S manager headquartered in Cairo frequently visiting the site and a community liaison officer (CLO).. The CLO will be responsible for necessary implementation of the SEP. The engagement activities will focus on:

- Disseminating Project information.
- Discussing potential impacts and risks and how they will be managed.
- Seeking views and concerns on the Project and its activities.
- Building trust with the Project and stakeholders including communities.
- Establishing effective feedback analysis mechanism and Grievance Mechanism.

Contact information for the Project CLO is provided below:

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 Email: [reham.karram@scatec.com](mailto:reham.karram@scatec.com)  
 Mobile: +201201568049

The approach and programme for stakeholder engagement that will be used are described below.

### 8.2.1 Stakeholder Engagement channels

The following communication channels will be used

Mechanism	Description
<b>Social media</b>	The official Facebook page of Qena governorate and the Nagaa Hammadi city could be used as a primary source of information. Both Facebook groups with have membership more than 5000 members. There are also communities Facebook that could be used.
<b>Project website</b>	The company project website, which contains key project information and updates. Updates on the project can be found at <a href="https://scatec.com/2024/09/12/scatec-signs-ppa-for-1-gw-solar-and-100-mw-200-mwh-battery-storage-project-in-egypt/">https://scatec.com/2024/09/12/scatec-signs-ppa-for-1-gw-solar-and-100-mw-200-mwh-battery-storage-project-in-egypt/</a> .
<b>Flyers (Factsheets)</b>	Job vacancies and other project information can be posted at the local labour offices, NGOs and social media
<b>Face-to-face (one on one)</b>	Could be arranged through the available NGOs, particularly the women NGOs. Face-to-face communication is usually a preferred method of communication with the communities. The project intends to assign a community liaison to facilitate more effective face-to-face community engagement.
<b>Focus Group Discussions (FGDs) with vulnerable groups</b>	The project will hold annual FGDs with vulnerable groups such as the elderly, women, illiterate people, people with special needs and any community members who may not be able to participate in formal meetings.

### 8.2.2 Stakeholder Engagement Resources

The implementation of the SEP requires a systematic approach to inform, engage and take onboard feedback from stakeholders and revising the plan, as necessary. The Developer has assigned a Community Liaison Officer (CLO)/team which will be based in Nagaa Hammadi. The CLO will closely coordinate with the developer's E&S and HR teams.

The CLO(s) is responsible for day-to-day management and face-to-face community engagement. The CLO will be a central point of contact in Nagaa Hammadi and undertake the engagement activities and to build and maintain robust relationships with local residents, businesses, NGOs and other stakeholder groups. The CLOs will also be responsible for ensuring that the Community Feedback Procedure is active and effective. The CLO team will include female CLO to ensure gender-based issues are addressed

The CLO will undertake the following responsibilities:

- Address any grievances expressed by the local communities through the GM including community gender based grievances..
- Identify any significant new E&S issues that may arise as the project progresses.
- Maintain records relating to consultations.
- Prepare internal and external report on social performance.

The CLO will also develop and maintain a Project Stakeholder Register that will be updated monthly. It will serve as a log for all consultation and engagement undertaken for the Project.

Table (6) below presents the roles and responsibilities for the SEP implementation.

**Table 6: Roles and responsibilities for SEP implementation**

<b>Responsible Party</b>	<b>Roles and Responsibilities</b>
Project Management	<ul style="list-style-type: none"> <li>– Oversee the overall implementation of SEP, including frequent interfacing with CLOs.</li> <li>– Ensure resources required (budgetary, human, and logistical resources) are available for the implementation of the SEP</li> <li>– Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.</li> </ul>
E&S manager	<ul style="list-style-type: none"> <li>– Regularly update the SEP and Grievance Mechanism</li> <li>– Implement and monitor stakeholder information exchange and participation strategies.</li> <li>– Reporting to project management</li> <li>– Government and lenders liaison</li> </ul>
Community Liaison Officer (CLO) -(Male and Female	<ul style="list-style-type: none"> <li>– Participate in the update the SEP as required during the project's lifetime, to include planning, construction, operation, and decommissioning.</li> <li>– Overall responsibility for implementing the requirements of the SEP plan</li> <li>– Interaction with the community</li> <li>– Undertaking monthly internal audits and Reporting to E&amp;S management</li> <li>– Coordinate with the EPC Contractor's team</li> </ul>
EPC Contractor / Project Operator	The EPC Contractor and its subcontractors(s) have the role in addressing the community grievances related to their workforce and report to the CLO.

Annex 1 presents a template of the proposed register.

### 8.2.3 Stakeholder Engagement Communication Action Plan

Table (7) below presents the timing of engagement for the different stakeholders with respect to the project phases. In addition, Table (8) presents the stakeholder engagement action plan to including relevant stakeholders, the objectives of the consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations.

**Table 7: Timing of engagement for the different stakeholders**

Stakeholders	Design stage	Implementation stage	Monitoring stage
Local Businesses & Industry	✓	✓	X
NGOs	✓	✓	X
Local Communities residents	✓	✓	✓
National Regulators/ agencies & Permitting Authorities	✓	✓	X
Ministry of transport – roads and bridges	X	✓	X
EETC	✓	X	X.
Other relevant stakeholders (, regulatory directorates in Qena	✓	X	X

Table 8: Stakeholders communication Action plan

Stakeholder	Potential issues/ concerns	Key messages	Communication mechanism	Frequency	Responsibility
<b>Primary Stakeholders</b>					
<b>Local Businesses &amp; Industry</b>	assess the capacities of relevant local suppliers and urge contractors to increase local content	Disclose information on project updates and development needs	One-on-one meetings,	Once during construction, with relevant supplier and contractor Ad-hoc as needed during construction	Relevant developer team ,CLO
<b>NGOs</b>	Community investment initiatives, Assistance with outreach to vulnerable groups	Project information and disclosures, <b>potential CSR activities</b> and Disclosure of (SEP) including grievance mechanism	One-on-one meetings, FGDs, Prepare leaflet in Arabic with updates on Project including environmental and social issues	As required	Relevant developer team ,CLO
<b>Workers</b>	Occupational health and safety risks, code of conduct and workers grievance mechanism, economic benefits	Project information and health and safety requirements and Disclosure of grievance mechanism	– Induction trainings – Internal meetings /toolbox talks	– Upon employment – Continuous during construction and operation	Developer HSSE Team / EPC Team as applicable
<b>Local Communities residents/ community)</b>	Provision of workforce, may include key leadership figures of community stakeholders	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism, project labour needs, potential CSR activities and disclosure of (SEP) including grievance mechanism	One-on-one meetings, FGDs,	Once before construction (to be updated when required)	Relevant developer team ,CLO
<b>Secondary Stakeholders</b>					
<b>Regional Government (Qena Governorate, Nagaa Hammadi city)</b>	Licensing renewal, security, employment and business opportunities, community investment initiatives	Disclose information on project updates and development	One-on- one meetings, written formal correspondence,	Bi-annually or as required	Developer team as relevant

Stakeholder	Potential issues/ concerns	Key messages	Communication mechanism	Frequency	Responsibility
<b>NREA</b>	Issuance of operation permits	Disclose information on project updates and development	One-on- one meetings, written formal correspondence,	<ul style="list-style-type: none"> <li>– During ESIA development</li> <li>– Issuance of operation permit and as required</li> </ul>	E&S manager and other Developer team as relevant
<b>EEAA</b>	ESIA approval , project follow up and ESMP inspection	Disclose information on project updates and development	One to one meetings, written formal correspondence,	<ul style="list-style-type: none"> <li>– At the scoping and ESIA preparation</li> <li>– biannually or as required</li> </ul>	Developer E&S manager
<b>EETC (responsible for associated OHTL)</b>	ESIA preparation of the OHTL and its construction timeframe	Disclose information on project updates and development	One to one meetings, written formal correspondence	<ul style="list-style-type: none"> <li>– During OHTL ESIA preparation</li> <li>– OHTL construction</li> </ul>	Developer E&S manager and other Developer team as relevant
<b>Local Labour office</b>	Employment & business opportunities, work permits.	Disclose information on project updates and development	One-on-one meetings, written correspondence	In advance of sub-contracting. Bi-annually or as required	E&S Manager, CLO & Project Human Resource representatives
<b>Healthcare service providers</b>	Handling of Site personnel emergency injuries & Corporate Social Responsibility activities for Community	Health related risks, impacts and mitigation plans.	One-on-one meetings, written correspondence.	As required	E&S Manager, & CLO
<b>Education providers (specifically technical /vocational training institutes)</b>	Project updates, opportunities available	Skill requirements, per project information and disclosures	One-on-one meetings	As required	E&S Manager, & Project Human Resource representatives & CLO
<b>Other Agencies relevant to utilities:</b> Ministry of Transport (roads and bridges Authority) Ministry of Water Resources and Irrigation)	Project updates and utility requirements and planning	Disclose construction information and project and time schedule and needs	One-on-one meetings, written correspondence	As required	Relevant developer team as

Stakeholder	Potential issues/ concerns	Key messages	Communication mechanism	Frequency	Responsibility
<b>Landowners along EETC's OHTL</b>	Crop damage during OHTL upgrade works, which includes replacing cables and/or conductors on the existing towers.	<p>Provide brief explanation of the transmission line upgrades, including the scope, timeline, and the reason for the upgrades (e.g., improving grid reliability, capacity).</p> <p>Clearly outline which areas will be affected, specifying the extent of the disruption to the land and crops.</p>	Meetings, newsletters, phone calls	Prior to commencing any upgrades along the OHTL segment	<p>EETC in collaboration with Scatec CLO, E&amp;S Manager and EETC EPC Contractor</p> <p>Additionally, the project will follow up and influence the EETC regarding compensation of potentially impacted landowners. Evidence of such engagement will be documented</p>

## 9. Community Grievance Redress Mechanism (GRM)

Minimizing grievances is realized through managing impacts and through pre-emptive stakeholder engagement designed to anticipate and address potential issues before they become grievances.

A grievance is defined as an issue, concern, problem or claim (perceived or actual) that an individual or community group wants a company or contractor to address and resolve. In alignment with the EBRD PRs (2019), the Grievance Mechanism (GM) will “seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue of concern”<sup>9</sup>. The mechanism will also allow for anonymous complaints to be raised and addressed.

The process covers all components and activities of the Project, including those activities undertaken by contractors and subcontractors on behalf of the Project. A separate GM shall also be developed to address issues or grievances raised by the Project workforce.

A computerized database will be established to record all complaints/grievances along with the complaint's closure/ resolving date. This will include the proposed actions, the exact date on which the complaint will be resolved, the actual date when it was resolved, and the effectiveness of the response to the complaint. Once database is designed, it will be operated, and a team will be trained on how to use it.

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

Handling grievances related to, Gender-based Violence (GBV), Sexual Exploitation and Abuse and Harassment (SEAH) will be undertaken in accordance with the requirements set within the AfDB<sup>10</sup> ISS Best Practice Note addressing SEAH and GBV and EBRD<sup>11</sup> good practice Addressing Gender-Based Violence and Harassment.

For any grievances related to the above, the following steps will be considered:

- CLO (male/female) will receive appropriate training (could be through the National Council for Women) on how to collect GBV cases confidentially and empathetically so that to respond appropriately to a survivor's complaint.
- Ensure confidentiality throughout the process.

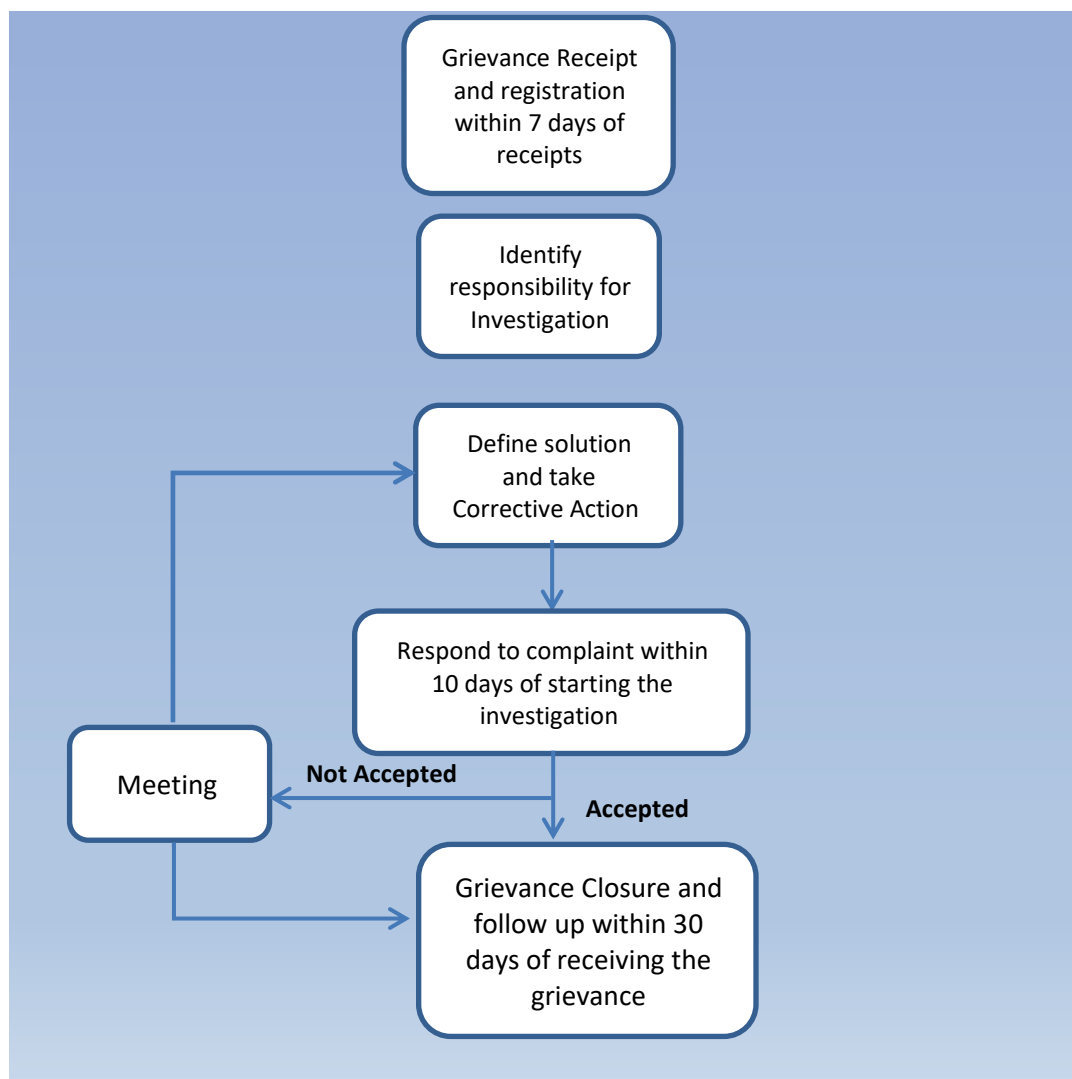
<sup>9</sup> IFC PS 2012, para. 35 (Grievance Mechanism for Affected Communities)

<sup>10</sup> [https://www.afdb.org/sites/default/files/borrower\\_guidance\\_note\\_on\\_gender\\_in\\_es\\_safeguards.pdf](https://www.afdb.org/sites/default/files/borrower_guidance_note_on_gender_in_es_safeguards.pdf)

<sup>11</sup> EBRD, Emerging Good Practice for the Private Sector Addressing Gender-Based Violence and Harassment, <https://www.ebrd.com/news/2020/new-guidance-for-private-sector-on-addressing-risks-of-genderbased-violence-and-harassment.html>

- Survivor information should not be disclosed or stored in the grievance log register. In addition, if a grievance is submitted through a grievance form it will be kept confidential.
- The CLO should assist the survivor by referring them to potential GBV support entities in the area for support after receiving a complaint from a survivor.
- The CLO and the Project Manager (with support of other concerned entities as relevant and as agreed with the survivor) will agree on a plan for resolution as well as the appropriate remedy for the perpetrator.

Figure 8 shows the proposed project's grievance mechanism system.



**Figure 8: Proposed project's grievance mechanism system**

- Grievances can be lodged in writing or verbally, as appropriate. The CLO will acknowledge receipt of the grievance and explain (in writing or verbally whichever is more appropriate) in brief the process of redress that will be followed.
- Grievances may also be lodged anonymously: a grievance box will be placed at different locations as well as construction site to allow community members, if any, and project staff to post written grievances. The telephone contact of the CLO will also be widely shared and published via the different communication channels described above.
- A Grievance form will be disclosed at key locations as well as on the company website. The Grievance form will inform the communities on how and where to submit a grievance. Annex (2) presents a template for the grievance form.
- Women will be offered the opportunity to report grievances to and receive feedback from a female representative.
- All grievances will be recorded in the grievance register, indicating details of the grievant, status and address of the person, type of stakeholder, the date on which the grievance happened and was recorded, a brief description of the grievance, detail on whether the grievance is a once-off or ongoing / repeated matter, and the outcome that is being sought;
- Grievance investigation will be recorded.
- After the grievance has been resolved, the resolution will be communicated in to the grievant. The date on which the matter was resolved and a summary of the resolution will be recorded in the grievance register. Should the complainant still be dissatisfied, the complainant may appeal.
- The GRM will be communicated to all stakeholders through the CLOs prior to and during the project implementation.
- On a monthly basis, the grievance register will be reviewed to ensure all grievances are captured, and responded to. Implementation of the measures proposed to address the grievance should be checked and the close-out of the grievance monitored.

## 10. Monitoring and Reporting

### 10.1 Monitoring

To ensure the smooth operation and the effectiveness of the stakeholder engagement process, including that the disclosure and consultation efforts are implemented meaningfully and continuously, a monitoring, analysis and reporting process will be adopted by the project.

The SEP will be monitored through monthly internal audits. During these audits, community members will be asked for feedback on the stakeholder engagement programme. During this audit, community members will be asked for feedback on the stakeholder engagement programme. In addition, bi-annual audit checks for external monitoring. The indicators that will be used to monitor the implementation of the SEP will include, but not limited the following:

- Dates of publication and distribution and Locations of distribution
- Number of engagement activities (place, dates and number of participants)
- Number of men and women that attended each of the meetings above
- Number and types of comments by stakeholders
- Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental agencies, Local authorities, NGOs).
- Issues raised by NGOs and other Stakeholders, actions agreed and status of those actions
- Number of grievances received from affected people and from external stakeholders
- Number of grievances (i) open, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.
- Categorization of grievances (by topic – e.g. noise/ safety), disaggregated by complainant's gender
- Number of grievances raised by workers, disaggregated by gender of workers and worksite
- Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.

## 10.2 Reporting

The reporting of stakeholder engagement activities will be undertaken throughout the Project. This will help facilitate continuous improvement of the engagement process and its contribution to improving the project's E&S performance.

All grievances will be summarised and reported to management on a monthly basis

All action plan requirements at completion of construction and during operations, the project will consider preparing an Annual Report or Summary on the project's social and environmental performance. The annual report and the Stakeholder engagement activities and significant changes or updates in the project and the environmental and social issues will be annually reported and published to a wider audience in a transparent way through public domain documents.

## **Annex (1): Grievance Form**

Grievance Form	
<b>1. Contact Information</b>	
1.1 Complainant Full Name:	The complainant has the right to write his name or submit the grievance anonymously
1.2 Phone No.	
<b>2. Details of Complaint</b>	
2.1 When it occurred:	
2.2 Where it occurred:	
2.3 Who was involved:	
2.4 Description of Complaint:	
<b>3. Proposed Corrective Action</b>	
What would you like to see happen to resolve the problem?	

**Annex (2): Grievance Register**

Community Grievance Register

Submission Date	Name of Complainant/ (could be Anonymous)	Brief Description of Grievance	Corrective Action	Response Accepted (Y/N)	Meeting Results (In case corrective action is not accepted)	Closure Date