

Energy Valley, S.A.E.

Stakeholder Engagement Plan For Energy Valley Project (Minya – Naga Hammadi – Abu Qir)

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الملخص التنفيذي

تم إعداد خطة إشراك أصحاب المصلحة (SEP) ليتم تنفيذها طوال دورة حياة مشروع فالي للطاقة المستدامة، بما في ذلك مراحل التخطيط، والإفصاح، والإنشاء، والتشغيل. ولتلبية متطلبات المعايير الدولية والتشريعات المصرية، كما هو موضح في القسم ٤.٢، تركز هذه الخطة على المبادئ الرئيسية التالية:

- الإفصاح المبكر؛
- تصميم عملية الإفصاح بما يدعم التشاور الفعال؛
- توفير معلومات واضحة وذات معنى لأصحاب المصلحة؛
- ضمان سهولة الوصول إلى المعلومات لجميع الفئات المعنية.

كما تتضمن الخطة وضع وتنفيذ والتعريف بآلية التظلمات (GRM) ، والتي تتيح لأصحاب المصلحة التعبير عن مخاوفهم وملاحظاتهم المتعلقة بالمشروع، مع ضمان التعامل معها ومعالجتها بصورة مناسبة وفي الوقت المناسب.

وصف المشروع

يُعد مشروع فالي للطاقة المستدامة استراتيجياً للطاقة المتجددة وتخزين الطاقة، ويتكون من عدة مكونات موزعة على محافظات المنيا وقنا والإسكندرية. ويهدف المشروع إلى دعم تحول مصر نحو الطاقة النظيفة، وتعزيز استقرار الشبكة الكهربائية، وتسهيل دمج مصادر الطاقة المتجددة، وتوفير كهرباء نظيفة وموثوقة لدعم التنمية الصناعية.

يتضمن المشروع محطة هجينة للطاقة الشمسية الكهروضوئية ونظام تخزين بالبطاريات (PV+BESS) في شرق المنيا داخل منطقة هيئة الطاقة الجديدة والمتجددة، بقدرة تقارب ١,٩٥٠ ميغاوات ذروة (DC) وقدرة تصدير تقدر بحوالي ١,٧٠٠ ميغاوات (AC) ، بالإضافة إلى نظام تخزين بالبطاريات بسعة تقارب ١,٥٠٠ ميغاوات ساعة. كما يشمل المشروع محطة محولات المستهلك وخطوط النقل الهوائية المرتبطة بها في المنيا لربط المحطة الهجينة بالشبكة القومية وتغذية المنطقة الصناعية بوادي السراية، بالإضافة إلى نظام تخزين بالبطاريات في نجع حمادي بسعة ١,٠٠٠ ميغاوات ساعة مع محطة محولات مشتركة ٢٢٠/٣٣ كيلو فولت وخط نقل هوائي، ونظام تخزين بالبطاريات في أبو قير بسعة ١,٤٣٥ ميغاوات ساعة مع محطة محولات وخط ربط بالشبكة في محافظة الإسكندرية.

تشمل الجوانب البيئية والاجتماعية الرئيسية للمشروع خلال مرحلتي الإنشاء والتشغيل ما يلي:

مرحلة الإنشاء

- الأثرية والجسيمات العالقة والانبعاثات الغازية؛
- الضوضاء والاهتزازات؛
- احتياجات الموارد المائية؛
- تولد مياه الصرف؛
- تولد المخلفات الصلبة؛
- تولد المخلفات الخطرة؛

- زيادة حركة النقل والمواصلات؛
- تدفق العمالة.

مرحلة التشغيل

- الأتربة والجسيمات العالقة والانبعاثات الغازية المحدودة؛
- احتياجات الموارد المائية؛
- تولد مياه الصرف؛
- تولد المخلفات الصلبة؛
- تولد المخلفات الخطرة؛
- الوهج والانعكاسات الضوئية.

سيتم مناقشة الجوانب البيئية والاجتماعية ذات الصلة والتشاور بشأنها مع كل مجموعة من أصحاب المصلحة منذ بدء المشروع وحتى اكتماله. وستختلف القضايا البيئية والاجتماعية ذات الأولوية بحسب فئة أصحاب المصلحة، كما سيتم مراجعتها وتحديثها بشكل مستمر طوال عمر المشروع.

القضايا البيئية والاجتماعية ذات الأولوية التي تتطلب إشراك أصحاب المصلحة

تم تحديد القضايا البيئية والاجتماعية ذات الأولوية التي تتطلب إشراك أصحاب المصلحة بناءً على خصائص المشروع ونتائج دراسات تقييم الأثر البيئي والاجتماعي والملاحظات الواردة من أصحاب المصلحة حتى تاريخه، وتشمل ما يلي:

- فرص التوظيف المحلية وإجراءات التعيين وتعظيم المحتوى المحلي؛
- تدفق العمالة وترتيبات الإقامة ومدونة سلوك العاملين؛
- الصحة والسلامة والأمن المجتمعي؛
- الوصول إلى الأراضي وقيود حق المرور لخطوط النقل الهوائية؛
- إجراءات الإدارة البيئية خلال مرحلتي الإنشاء والتشغيل؛
- إشراك الفئات الأكثر احتياجاً أو عرضة للتأثر؛
- إدارة التظلمات وآليات تلقي ملاحظات أصحاب المصلحة.

تحديد أصحاب المصلحة

تم تحديد أصحاب المصلحة مع مراعاة منطقة التأثير الخاصة بالمشروع (AOI) كما هو موضح في القسم السادس، بالإضافة إلى نطاق التأثيرات المتوقعة والمناطق التي قد تتأثر بالتأثيرات المباشرة وغير المباشرة والتراكمية للمشروع.

ويشمل أصحاب المصلحة الرئيسيون الفئات التي قد تتأثر إيجاباً أو سلباً بالمشروع بصورة مباشرة أو غير مباشرة، بما في ذلك الفئات منخفضة الدخل والفئات المهمشة التي غالباً ما تكون أقل مشاركة في جهود التنمية، بالإضافة إلى منظمات المجتمع المدني والمنظمات المجتمعية التي قد تمثل مصالح هذه الفئات.

أما أصحاب المصلحة الثانويون فيشملون الجهات الحكومية، والهيئات التنظيمية، والخبراء، والأطراف المهمة، وغيرهم ممن قد يكون لهم تأثير على نتائج المشروع أو تنفيذ أنشطته.

منهجية إشراك أصحاب المصلحة

يتم اختيار أسلوب إشراك أصحاب المصلحة الأكثر ملاءمة لكل فئة من أصحاب المصلحة استناداً إلى اعتبارات موضوعية ومحايدة، تشمل طبيعة العلاقة مع المشروع، واحتياجاتهم من المعلومات، ومدى احتمال تأثرهم بأنشطة المشروع، ودورهم في التنسيق أو صنع القرار، وذلك على النحو التالي:

- الاجتماعات الفردية للجهات الرئيسية وأصحاب المصلحة لرئيسيين والجهات التي تتمتع بدور مؤثر في تطوير المشروع أو اتخاذ القرارات ذات الصلة؛
- مجموعات النقاش المركزة (FGDs) للفئات المتشابهة في الاهتمامات والاهتمامات المشتركة؛
- النشرات التعريفية والكتيبات والمنشورات عبر وسائل التواصل الاجتماعي والمراسلات الرسمية للتواصل مع أصحاب المصلحة الثانويين.

قنوات إشراك أصحاب المصلحة

تشمل قنوات التواصل المقترحة ما يلي:

- وسائل التواصل الاجتماعي؛
- البيانات الصحفية الصادرة عن الشركة؛
- النشرات التعريفية (Factsheets)؛
- الاجتماعات المباشرة (وجهاً لوجه)؛
- مجموعات النقاش المركزة مع الفئات الأكثر عرضة للتأثر.

بالإضافة إلى ذلك، يمكن تقديم التظلمات من خلال التواصل المباشر مع مسؤول الاتصال المجتمعي (CLO) عبر الهاتف أو تطبيق واتساب أو البريد الإلكتروني، حيث سيتم الإعلان عن بيانات التواصل من خلال صناديق الشكاوى عند بوابات المواقع وكذلك من خلال الوحدات المحلية والجهات ذات الصلة. كما ستتوفر استمارات التظلمات عبر الموقع الإلكتروني للمشروع. وسيكون مسؤول الاتصال المجتمعي مسؤولاً عن المتابعة الدورية وجمع التظلمات ومتابعة معالجتها.

آلية التظلمات المجتمعية (GRM)

سيتم تطوير وتنفيذ آلية للتظلمات المجتمعية لضمان استقبال ومعالجة الشكاوى والملاحظات المتعلقة بأنشطة المشروع أو مواقع الإنشاء أو التأثيرات المحتملة على المجتمعات المحلية. كما ستشمل الآلية إجراءات خاصة للتعامل مع الشكاوى المتعلقة بالعنف القائم على النوع الاجتماعي (GBV)، والتحرش الجنسي، والاستغلال والانتهاك الجنسي، مع ضمان السرية والحماية اللازمة.

المتابعة وإعداد التقارير

سيتم مراجعة تنفيذ خطة إشراك أصحاب المصلحة بصورة دورية من خلال الاجتماعات المنتظمة مع أصحاب المصلحة. وخلال هذه الاجتماعات سيتم الحصول على ملاحظات المجتمعات المحلية حول فعالية برنامج إشراك أصحاب المصلحة. كما تم تطوير مجموعة من مؤشرات الأداء الرئيسية (KPIs) لقياس مدى فعالية تنفيذ الخطة. وسيتم إعداد تقارير دورية حول أنشطة إشراك أصحاب المصلحة طوال فترة تنفيذ المشروع، بما يساهم في التحسين المستمر لعملية المشاركة وتعزيز الأداء البيئي والاجتماعي للمشروع.

الموارد المخصصة لإشراك أصحاب المصلحة

ستتكون الموارد المخصصة لإشراك أصحاب المصلحة من مسؤول اتصال مجتمعي (CLO) متفرغ مقره محافظة المنيا، حيث تتركز الأنشطة الرئيسية للمشروع وأكبر تواجد للقوى العاملة، وذلك بدعم من مدير البيئة والمجتمع وفريق الموارد البشرية بالمشروع. وسيتولى مسؤول الاتصال المجتمعي، ومقره المنيا، تغطية مكونات المشروع في المنيا، ونجع حمادي، وأبو قير من خلال زيارات ميدانية مخططة، والتنسيق المباشر مع السلطات المحلية، والجهات ذات العلاقة، وممثلي المجتمعات المحلية. وفي نجع حمادي، سيستفيد المشروع - حيثما أمكن وبالاتفاق - من الدعم الجزئي أو المحلي المقدم من مسؤولي الاتصال المجتمعي بـ مشروع أوبليسك للمساعدة في تنسيق الاجتماعات، والمتابعة المحلية، وتبادل المعلومات.

وسيكون مسؤول التواصل المجتمعي نقطة الاتصال الرئيسية للمشروع ويتولى مسؤولية ضمان فعالية آلية تلقي الملاحظات والتظلمات والتنسيق المستمر مع فرق البيئة والمجتمع والموارد البشرية التابعة للمطور، إضافة إلى إدارة أنشطة التواصل المباشر مع المجتمعات المحلية وأصحاب المصلحة.

وسيتم تخصيص الموارد المالية والبشرية واللوجستية اللازمة لدعم عمليات التشاور مع أصحاب المصلحة، والإفصاح عن المعلومات، وإدارة التظلمات، وإعداد مواد التواصل، وأعمال المتابعة وإعداد التقارير، وغيرها من أنشطة إشراك أصحاب المصلحة المرتبطة بمكونات المشروع في المنيا ونجع حمادي وأبو قير. وتبلغ الميزانية السنوية الاسترشادية لتنفيذ أنشطة خطة إشراك أصحاب المصلحة حوالي ٣٠٠,٠٠٠ جنيه مصري، وتشمل تحديثات الخطة، وإعداد مواد الإفصاح باللغة العربية، وتنظيم اجتماعات وجلسات الإفصاح، وأنشطة إشراك الفئات الأكثر عرضة للتأثر، وتنفيذ آلية التظلمات، وتكاليف انتقالات مسؤول الاتصال المجتمعي والزيارات الميدانية، بالإضافة إلى أنشطة الرصد وإعداد التقارير. ويعرض القسم ١٠.٤ التفاصيل الكاملة لتوزيع هذه الميزانية، مع التأكيد على أنها ميزانية استرشادية سيتم مراجعتها وتحديثها بصورة دورية طوال دورة حياة المشروع.

Executive Summary

The Stakeholder Engagement Plan (SEP) to be implemented by project throughout its planning, construction, and operation phase. To meet requirements of international standards and Egyptian legislation, as detailed in section 4.2, the key principles of this SEP include:

- Early disclosure
- Design disclosure to support consultation
- Provide meaningful information to stakeholders
- Ensure the accessibility of information

The engagement of stakeholders will also outline, implement and communicate a grievance redress mechanism (GRM) by which stakeholders can communicate concerns to the project and be assured they will be addressed.

Project description

The Energy Valley Project is a strategic renewable energy and battery storage programme comprising several components located across Minya, Qena and Alexandria Governorates. The overall objective of the Project is to support Egypt's energy transition, improve grid stability, facilitate the integration of renewable energy, and provide clean and reliable electricity to support industrial development. The project comprises a large-scale Minya Hybrid PV+BESS Facility within the NREA East Minya concession, with approximately 1,950 MWp DC solar PV capacity, an estimated 1,700 MW AC export capacity, and an integrated 1,500 MWh BESS. The Project also includes the Consumer Substation and associated OHTLs in Minya to connect the Hybrid Facility to the national grid and supply Wadi El-Sariya Industrial Zone, a 1,000 MWh Naga Hammadi BESS with a shared 33/220 kV substation and OHTL, and a 1,435 MWh Abu Qir BESS with substation and OHTL in Alexandria Governorate.

The project E&S aspects of the construction and operation stages include:

- **Construction phase**
 - Dust/Particulate Matter/Gaseous Emissions
 - Noise and vibrations
 - Water Resource Requirements
 - Wastewater Generation
 - Solid waste generation
 - Hazardous waste generation
 - Increased Transportation Demand
 - Workers Influx
- **Operation phase**
 - Dust/Particulate Matter/Gaseous Emissions
 - Water Resource Requirements
 - Wastewater Generation
 - Solid waste generation
 - Hazardous waste generation

- Glare

For each group of identified stakeholders, relevant E&S aspects will be discussed and consulted on from project initiation to its completion. Priority E&S impacts will differ according to stakeholder group and will be continuously reviewed and updated throughout the project lifetime.

Priority E&S Issues Requiring Stakeholder Engagement

The priority environmental and social issues requiring stakeholder engagement have been identified based on the Project characteristics, ESIA findings and stakeholder feedback received to date. These include:

- Local employment opportunities, recruitment procedures and local content;
- Worker influx, accommodation arrangements and workers' Code of Conduct;
- Community health, safety and security;
- Land access and OHTL right-of-way restrictions;
- Environmental management measures during construction and operation;
- Inclusion of vulnerable groups; and
- Grievance management and stakeholder feedback mechanisms.

Stakeholder Identification

Stakeholder identification took place taking into consideration the Project's Area of Influence (AoI)¹ as detailed in section 6, the extent of the anticipated impacts and the areas potentially affected by the induced and cumulative impacts of the Project.

Primary stakeholders include those who will be directly affected, positively or negatively, by a development. These would, in particular, include low-income 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.

Secondary stakeholders may include agencies, experts, interested parties and anyone able to influence the outcome of the development.

Stakeholder Engagement Approach

The engagement method deemed most effective for each stakeholder group is selected using neutral engagement considerations, including the stakeholder group's relationship to the Project, information needs, potential exposure to Project impacts, and role in coordination or decision-making.

- Individual meetings are the method of choice for primary stakeholders and those organizations characterized by a high influence on the development
- Focus Group Discussions (FGDs) are selected to interact with stakeholders characterized by a large number and a relative homogeneity.
- Fact sheets, leaflets, social media posts and official correspondence can be used to interact with secondary stakeholders.

¹ 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

Stakeholder Engagement channels

Proposed engagement channels include:

- Social media
- Press release via company
- Flyers (Factsheets)
- Face-to-face (one on one)
- Focus Group Discussions (FGDs) with vulnerable groups

In addition to the above, Grievances can be raised through direct contact with the CLO through the mobile and WhatsApp numbers and email are, typically posted on the grievance boxes at the site's gates as well as posted at the local municipality. In addition, Grievance forms are available at the project website. The CLO will be responsible to regular follow up with the different points to collect the complaints.

Community Grievance Redress Mechanism (GRM)

The mechanism will be developed to ensure the processing of complaints related to the construction site and complaints from local residents. It will consider Stakeholder Grievance Mechanism to include Gender Based Violence, Sexual Harassment and Sexual Exploitation and Abuse

Monitoring and Reporting

The SEP process will be reviewed based on regular stakeholder meetings. During these meetings, community members will be asked for feedback on the stakeholder engagement program. Key Performance Indicators (KPIs) are developed to assess the SEP implementation. 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.

Stakeholder Engagement Resources

Stakeholder engagement resources will comprise one full-time CLO based in Minya, where the main Project activities and largest workforce interface are expected, supported by the Project E&S Manager and HR team. The Minya-based CLO will cover the Minya, Naga Hammadi and Abu Qir components through planned site visits and direct coordination with local authorities, interface entities and community representatives. In Naga Hammadi, the Project will use part-time/local support from Obelisk's community liaison personnel, where feasible and agreed, to support meeting arrangements, local follow-up and information sharing.

Resources will be allocated to support stakeholder consultations, information disclosure, grievance management, communication materials, monitoring and reporting, and other stakeholder engagement activities across the Minya, Naga Hammadi and Abu Qir Project components. The indicative annual SEP activity budget is EGP 300,000. This covers SEP updates, Arabic disclosure materials, stakeholder meetings and disclosure sessions, targeted vulnerable-group engagement, GRM implementation, CLO travel and site engagement logistics, and monitoring and reporting. The detailed budget breakdown is provided in Section 10.4 and will be reviewed and updated periodically throughout the Project lifecycle.

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 Energy Valley project throughout its planning, construction, and operation phase. This SEP has been prepared as a Project-wide document covering the Energy Valley sites in Minya, Naga Hammadi and Abu Qir.

To meet requirements of international standards² 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 should 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**
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 ESIA preparation.

² Specifically, World Bank Environmental and Social Standard 10 (Information Disclosure and Stakeholder Engagement), IFC Performance Standard 1 (Assessment and Management of Environmental and Social Risks and Impacts) and African Development Bank Group's Integrated Safeguards System 2023 - Operational Safeguard 10: Stakeholder Engagement and Information Disclosure

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 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.

- **SEP during project implementation**

This stage will outline how stakeholders relevant to each project component 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

Energy Valley is a first-of-its-kind large-scale integrated renewable energy and infrastructure development platform in Egypt, combining utility-scale solar PV, Battery Energy Storage Systems (BESS), transmission infrastructure, and industrial electrification to deliver reliable and dispatchable clean energy.

The project is structured around a hybrid renewable energy model utilizing advanced BESS technologies with grid-forming and black-start capabilities, enabling constant dispatchable power and full grid support services.

The Energy Valley Project comprises four main sites covered by this SEP:

- **Hybrid Plant (Minya):** Development of a 1.95 GWp solar photovoltaic (PV) plant combined with a 1,500 MWh Battery Energy Storage System (BESS) in Minya.
- **Grid Connection and Consumer Substation (Minya):** Construction of a grid-connecting 500 kV OHTL of approximately 2.5 km linking the hybrid plant to the existing 500 kV OHTL. This component also includes a step-down substation located near the Sarirya Industrial Zone and an additional approximately 1 km OHTL connection to the industrial zone.
- **Abu Qir Battery Energy Storage System (BESS) (Abu Qir):** Installation of a 1,435 MWh BESS facility in Abu Qir, including a dedicated 33/500 kV step-up substation with an approximate capacity of 360 MVA.
- **Naga Hammadi Battery Energy Storage System (BESS) (Nagaa Hammadi):** Installation of a utility-scale 1,000 MWh BESS facility, together with a shared 33/220 kV step-up substation and associated 220 kV overhead transmission lines (OHTLs).

Figure 1 below shows the wide extent of the project locations across Egypt.

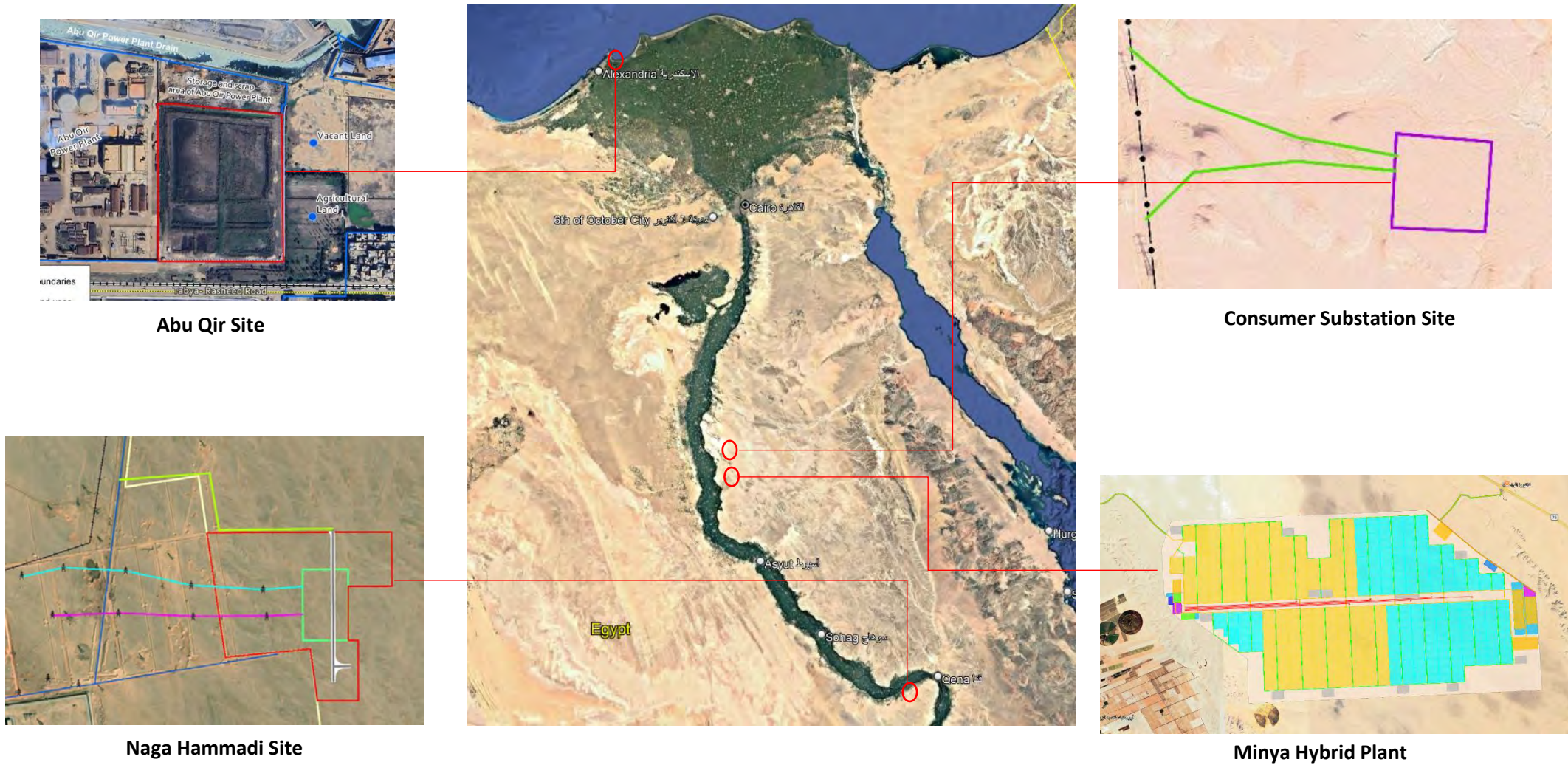


Figure 1: Energy Vally Project Locations



Figure 2: General Stages of the different Project Component Construction

3. Overview of Potential Environmental and Social Impacts

3.1 Potential E&S Impacts

Potential environmental and social impacts of the construction and operation of the Energy Valley Project components are shown in Table 1. The table covers the four project sites/components: Minya Hybrid PV+BESS Facility, Consumer Substation and OHTLs, Naga Hammadi BESS and shared substation/OHTL, and Abu Qir BESS and substation/OHTL interface

For each group of identified stakeholders, relevant E&S aspects will be discussed and consulted on from project initiation to its completion. Priority E&S will differ according to stakeholder group and these will be continuously reviewed and updated throughout the project lifetime.

Table 1: Project E&S Relevant Aspects, Potential Receptors and Impacts

E&S Aspect	Potential Receptors	Potential impact
Construction Phase		
Dust/Particulate Matter/Gaseous Emissions	Ambient air, workers and adjacent communities, if any	Minya Hybrid PV+BESS: Dust and exhaust emissions may result from site clearing, grading, levelling, excavation, access road construction, internal roads, PV/BESS foundations, movement of heavy vehicles, diesel generators and transport of PV/BESS equipment across unpaved desert areas. Impacts are expected to be localized and temporary. Consumer Substation + OHTLs: Emissions will be limited to excavation for tower foundations, substation construction, movement of construction vehicles and use of diesel generators. Given the relatively short OHTLs and limited substation footprint, impacts are expected to be localized and short-term. Naga Hammadi BESS + shared substation/OHTL: Dust and exhaust emissions may occur from site preparation, foundation works, installation of BESS containers, substation works, OHTL tower foundations and vehicle movements. The site is within / adjacent to the Dandara PV development area, with Baraka Village approximately 2.8 km northwest, so impacts are expected to be limited and manageable. Abu Qir BESS: Dust may be relatively limited due to wet / low-lying ground conditions, but exhaust emissions will occur from construction machinery, dewatering equipment, delivery vehicles and temporary generators. Nearby receptors include Ezbet El Setin, agricultural land and Abu Qir Power Plant facilities.
Noise and vibrations	Workers, nearby communities, industrial facilities, road users and adjacent land users	Minya Hybrid PV+BESS: Main sources include ramming / piling for PV structures, construction equipment, heavy vehicles, foundation works, BESS installation, generators and internal road works. The nearest residential settlement is distant; therefore, community noise impacts are expected to be limited, while workplace noise is more relevant. Consumer Substation + OHTLs: Noise will arise from excavation, tower erection, conductor stringing, cranes, trucks and substation construction. Due to the short duration and distance from settlements, impacts are expected to be localized, mainly affecting workers. Naga Hammadi BESS + shared substation/OHTL: Noise sources include foundation works, BESS container installation, crane operations, substation works and OHTL tower erection/stringing. Given the distance to Baraka Village, ambient noise impacts are expected to be limited; occupational noise exposure remains relevant. Abu Qir BESS: Noise may arise from dewatering, ground improvement, foundation works, crane lifting of battery containers, equipment installation and vehicle movement. Because Ezbet El Setin is around 100 m east of the site, construction noise should be managed carefully even if works are temporary.
Water Resource Requirements	Local water supply systems, licensed water suppliers, workers	Minya Hybrid PV+BESS: Water demand is highest among the sites due to the large construction workforce and project scale. Peak construction demand is estimated at about 97 m³/day for sanitary / domestic use and about 76 m³/day for construction activities, in addition to bottled drinking water. Consumer Substation + OHTLs: Water demand will be limited and mainly required for concrete curing, brick / plastering works and sanitary purposes. Water will be trucked from licensed / approved sources. Naga Hammadi BESS + shared substation/OHTL: Construction water demand is expected to be limited, around 10 m³/day for drinking and sanitary purposes. Abu Qir BESS: Construction water demand is also limited, estimated at about 10 m³/day for sanitary purposes.

E&S Aspect	Potential Receptors	Potential impact
Wastewater Generation	Soil and groundwater	Minya Hybrid PV+BESS: Wastewater generation will be significant during construction due to the large workforce and worker accommodation / welfare facilities, estimated at about 75–100 m³/day. Improper management could affect soil; groundwater impact is unlikely given the deep groundwater level, but wastewater must be collected and removed by authorized contractors. Consumer Substation + OHTLs: Wastewater will be limited to sanitary wastewater from a smaller workforce. It will be collected and transported by authorized contractors; impacts on groundwater are not expected due to depth and limited volumes. Naga Hammadi BESS + shared substation/OHTL: Domestic wastewater during construction is expected to be around 8.5 m³/day and will be collected in temporary septic tanks and removed by licensed contractors. Abu Qir BESS: Construction wastewater includes domestic wastewater and potentially pumped accumulated water from former fishpond / low-lying areas. This requires specific management because of nearby receptors, including Rakta Canal, agricultural drains and shallow groundwater. No uncontrolled discharge should occur.
Solid waste generation	Workplace, workers, soil, , waste management facilities	Minya Hybrid PV+BESS: Large-scale construction will generate domestic waste, packaging, plastics, wood, scrap metals, cable offcuts, concrete debris and general construction waste. Poor management could affect housekeeping, attract pests / stray animals and cause localized soil impacts. Consumer Substation + OHTLs: Waste quantities are expected to be smaller and mainly include packaging, scrap metal, construction debris, cable offcuts and domestic waste from workers. Naga Hammadi BESS + shared substation/OHTL: Waste will include construction debris, packaging, scrap metal, cable offcuts, domestic waste and small quantities from OHTL construction. The footprint is smaller than Hybrid site, but waste must be segregated and removed through licensed contractors. Abu Qir BESS: Waste will include stripped vegetation / reed material, topsoil / organic material from site preparation, packaging, construction debris, scrap materials and domestic waste.
Hazardous waste generation	Workplace, workers, soil, , waste management facilities	Minya Hybrid PV+BESS: Hazardous wastes may include used oils, oily rags, filters, solvent / paint containers, chemical containers, contaminated spill materials, batteries, e-waste and potentially damaged PV modules / BESS components. Consumer Substation + OHTLs: Hazardous wastes may include oils, lubricants, hydraulic oils, paints, solvents, contaminated containers and spill clean-up materials. Naga Hammadi BESS + shared substation/OHTL: Hazardous waste may include used oils, lubricants, contaminated rags, filters, chemical containers, etc. Abu Qir BESS: Hazardous waste may include used oils, contaminated materials, chemical containers, etc.
Increased Transportation Demand	Communities along the transport route, road users	Minya Hybrid PV+BESS: Transport requirements will be substantial due to the large volume of PV modules, BESS containers, steel structures, transformers, construction materials, water, fuel and workforce movement. Main risks relate to road safety, traffic congestion at access points, driver fatigue, heavy vehicles and interaction with roadside communities along transport routes. Consumer Substation + OHTLs: Traffic will be much lower than Hybrid site but will include delivery of transformers, tower components, conductors, cranes and construction materials. Some oversized loads may be required, but the

E&S Aspect	Potential Receptors	Potential impact
		overall impact is expected to be minor and temporary. Naga Hammadi BESS + shared substation/OHTL: Traffic will include delivery of BESS containers, substation equipment, transformer components, OHTL towers and workforce transport. Abu Qir BESS: Transport will occur through El Tabia–Rashid Road and local access roads near agricultural land, railway infrastructure and industrial facilities. Traffic management is important due to nearby Ezbet El Setin, Abu Qir Power Plant interfaces and potential heavy equipment deliveries.
Workers Influx	Workers, nearest communities, local services, vulnerable groups, local labour market	Minya Hybrid PV+BESS: This is the most relevant site for worker influx due to the large construction workforce, which may reach approximately 5,000 workers at peak. Potential impacts include pressure on housing, local services, food supply, community interactions, worker welfare, GBV/SEA/SH risks, and labour recruitment grievances. On-site accommodation and controlled off-site accommodation arrangements will be required. Consumer Substation + OHTLs: Workforce is expected to be much smaller, around 200 workers, with accommodation expected in New Minya where needed. Worker influx impacts are expected to be limited but should still be managed through recruitment procedures, Code of Conduct and grievance mechanisms. Naga Hammadi BESS + shared substation/OHTL: Peak workforce is expected to be around 250 workers. Most workers are expected to commute daily from nearby urban centres / communities, with no permanent camp expected. Abu Qir BESS: Peak workforce is expected to be around 250 workers. Workers are expected to commute daily from existing residential areas, with no permanent camp near communities. Potential impacts relate mainly to worker-community interaction, labour conditions, transport safety and grievance management.
Land use / land access restrictions	Government authorities	Minya Hybrid PV+BESS: Located on NREA-allocated renewable energy land. The ESIA scopes out land-use restrictions and involuntary resettlement impacts. Previous informal agricultural activities were reportedly post-designation / post-cut-off and were removed by government authorities prior to handover; therefore, PS5 / ESR5 compensation and resettlement requirements are not considered applicable. Consumer Substation + OHTLs: Located on government-owned, undeveloped desert land. No physical or economic displacement is anticipated, and land acquisition impacts are scoped out. Naga Hammadi BESS + shared substation/OHTL: Located within the Dandara PV Project area / government-owned desert land. No land acquisition or displacement is anticipated; PS5 / ESR5 is not to be triggered.. Abu Qir BESS: The BESS footprint is within Abu Qir Power Plant / West Delta Electricity Production Company land and is vacant, fenced and free of active land uses; PS5 / ESR5 is not to be triggered for the BESS footprint. Any final OHTL route crossing agricultural land will be assessed separately in the ESIA to be developed by EETC, as they are the owner of the OHTL lines.
Operation Phase		
Dust/Particulate Matter/Gaseous Emissions	Occupational work environment	Minya Hybrid PV+BESS: Operational emissions are expected to be very limited and mainly associated with maintenance vehicles and emergency generators. Consumer Substation + OHTLs: No routine operational air emissions are expected, except occasional maintenance vehicles.

E&S Aspect	Potential Receptors	Potential impact
		Naga Hammadi BESS + shared substation/OHTL: No routine air emissions are expected from BESS operation; otherwise, emissions are limited to maintenance vehicles / emergency backup systems. Abu Qir BESS: No routine combustion emissions are expected. Potential emissions relate to maintenance vehicles, emergency backup equipment.
Operational noise and vibration	Workers, nearby communities	Minya Hybrid PV+BESS: Operational noise may arise from inverters, transformers, BESS HVAC/cooling systems, trackers and emergency generators. Receptors are distant, so community impacts are expected to be limited; workplace exposure should be managed. Consumer Substation + OHTLs: Operational noise may include transformer hum and corona noise from OHTLs under certain atmospheric conditions. Impacts are expected to be localized and minor. Naga Hammadi BESS + shared substation/OHTL: Noise may arise from BESS cooling systems, PCS/inverters, transformers and OHTL corona noise. Given the distance to Baraka Village, ambient noise impacts are expected to be limited. Abu Qir BESS: Operational noise may arise from PCS/inverters, cooling fans/pumps, transformers and auxiliary equipment. Due to proximity to Ezbet El Setin and Abu Qir industrial receptors, periodic monitoring / verification is recommended.
Water Resource Requirements	Water supply systems, workers)	Minya Hybrid PV+BESS: Operation water use is limited to sanitary / office use, estimated at about 75–100 m³/month. No wet PV cleaning is expected if dry cleaning is adopted. Consumer Substation + OHTLs: Operation water demand is limited and associated with occasional maintenance and small workforce needs. Naga Hammadi BESS + shared substation/OHTL: Operation demand is very limited, approximately 0.3 m³/day for office / sanitary use. BESS closed-loop cooling does not require routine process water consumption. Abu Qir BESS: Operation demand is very limited, approximately 0.3 m³/day for office / sanitary use. Closed-loop cooling avoids process water use and routine discharge.
Wastewater Generation	Soil and groundwater	Minya Hybrid PV+BESS: Operation wastewater is expected to be limited, around 8–12 m³/day, and should be collected and removed by authorized contractors or managed through approved systems. Consumer Substation + OHTLs: Wastewater generation is negligible / limited to operation staff and maintenance visits. Naga Hammadi BESS + shared substation/OHTL: Wastewater is expected to be around 0.26 m³/day and managed through available wastewater infrastructure. Abu Qir BESS: Wastewater is expected to be around 0.26 m³/day and managed through available wastewater infrastructure. Any stormwater, dewatering or runoff interface should prevent discharge to nearby drains / Rakta Canal unless permitted.
Solid waste generation	Workplace, workers, soil, nearby communities, waste management facilities	Minya Hybrid PV+BESS: Operation waste will include domestic waste, packaging, spare parts, office waste and maintenance waste. Volumes are limited compared to construction but require segregation and licensed disposal. Consumer Substation + OHTLs: Waste from maintenance will be minor and may include packaging, spare parts and

E&S Aspect	Potential Receptors	Potential impact
		replaced components. Naga Hammadi BESS + shared substation/OHTL: Waste will be limited and mainly associated with operational staff, maintenance packaging and replaced parts. Abu Qir BESS: Waste will be limited during routine operation but should be managed carefully to avoid attracting pests and affecting nearby agricultural / drainage areas.
Hazardous waste generation	Workplace, workers, soil, nearby communities, waste management facilities	Minya Hybrid PV+BESS: Hazardous waste may include used oils, cleaning solvents, contaminated materials, e-waste, damaged PV panels and end-of-life batteries. End-of-life PV modules and BESS batteries should be managed through supplier take-back, authorized recycling or licensed hazardous waste channels. Consumer Substation + OHTLs: Hazardous waste may include transformer oil, lubricants, hydraulic oils, solvents, contaminated materials, e-waste and, if relevant, SF6-related materials / cylinders. Naga Hammadi BESS + shared substation/OHTL: Hazardous waste may include used oils, transformer oil-contaminated materials, e-waste, spent filters, contaminated rags and end-of-life battery modules. Abu Qir BESS: End-of-life battery modules are the main future hazardous / special waste stream and should not be treated as routine maintenance waste.
Fire, battery safety and emergency risks	Workers, emergency responders, nearby communities, adjacent facilities, grid infrastructure	Minya Hybrid PV+BESS: Relevant due to the large BESS component. Potential risks include battery overheating, thermal runaway, fire, electrical faults and emergency response requirements. Controls should include BMS, fire detection/suppression, spacing, emergency isolation and coordination with Civil Defence. Consumer Substation + OHTLs: Main emergency risks relate to electrical faults, transformer fire, oil spills, OHTL incidents and electrocution hazards. Naga Hammadi BESS + shared substation/OHTL: Relevant due to 1,000 MWh BESS and shared substation. Battery fire / thermal runaway plan, transformer fire controls and OHTL emergency response are required. Abu Qir BESS: Particularly important due to 1,435 MWh BESS, proximity to Abu Qir Power Plant and nearby receptors. Thermal runaway, fire, electrical faults and emergency response requirements. Controls should include BMS, fire detection/suppression, spacing, emergency isolation and coordination with Civil Defence.
Glare/ visual impacts	Road users, nearby communities, landscape receptors	Minya Hybrid PV+BESS: Glare may be relevant due to the large PV field and nearby road corridors. No glare impact has been identified in the ESIA for the Hybrid site. Consumer Substation + OHTLs: Visual impacts are limited to the substation and short OHTL sections in a desert / industrial setting and are expected to be limited. Naga Hammadi BESS + shared substation/OHTL: Visual effects relate mainly to BESS containers, shared substation and short 220 kV OHTL and are expected to be limited. Abu Qir BESS: Visual impacts relate to BESS containers and substation equipment within an existing industrial / power plant setting and are expected to be limited.

3.2 Priority E&S Issues

The priority E&S issues requiring stakeholder engagement have been identified based on the nature and scale of the different project components, their Area of Influence, the outcomes of the ESIA, and stakeholder feedback received to date. These issues will be reviewed and updated throughout the Project lifecycle. The main priority issues include:

Local employment and recruitment: Stakeholders have expressed interest in job opportunities and transparent recruitment procedures. The Project will disclose labour needs, required skills, recruitment channels, and the prohibition of informal “hiring at the gate”. Coordination with local labour offices and Governorate youth employment administrations will be maintained.

Worker influx and accommodation: This is most relevant to the Minya Hybrid PV+BESS component due to the expected construction workforce. Engagement will focus on accommodation arrangements, local hiring, worker transport, workers’ Code of Conduct, GBV/SEA/SH prevention, and avoiding pressure on small communities.

Land access and OHTL right-of-way: Engagement will cover land allocation, site access, OHTL right-of-way restrictions, and safe land use near electrical infrastructure. For the Minya Hybrid site, the ESIA concludes that PS5/PR5 is not expected to apply to the Project footprint. For Abu Qir, any land-related impacts associated with the final OHTL alignment will be assessed and managed by EETC / the relevant OHTL owner, as required.

Community health, safety and security: Engagement will address construction disturbance, road safety, site access, security conduct, emergency preparedness, and communication of safety restrictions near substations, BESS facilities and OHTLs.

Environmental management: Stakeholder engagement will address dust, noise, waste, wastewater, water supply, drainage/dewatering, hazardous materials, biodiversity protection, and measures to prevent nuisance or pollution during construction and operation.

Vulnerable groups and social inclusion: The SEP will ensure that women, elderly persons, persons with disabilities, low-income groups, unemployed youth, illiterate persons and other vulnerable groups can access Project information and grievance channels in a safe and appropriate manner.

Cultural heritage and chance finds: Although no direct impacts on known cultural heritage sites are expected within the Project footprints, stakeholders will be informed that chance find procedures will apply during ground-disturbing activities.

Grievance management: The Project will maintain accessible grievance mechanisms for communities and workers, including channels for anonymous complaints and confidential handling of GBV/SEA/SH-related grievances.

4. Regulatory Framework

4.1 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.

4.1.1 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 could 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 place³. 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:

- 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

³ Other lower category projects are not required undertake public disclosure meetings

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.

4.2 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 engagement⁴. The he Bank Group Policy on Disclosure and Access to Information and Social Operational Safeguard 10 emphasizes Effective stakeholder engagement which requires disclosure of information to facilitate understanding prior to meaningful consultation and that stakeholder engagement should be initiated as early as possible in the project life cycle, during project identification, and proactively managed until the project is closed.

Similarly, the International Finance Corporation (IFC) as well as the DFC⁵ recognize 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 IFC⁶ 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.
- **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.

⁴ HANDBOOK ON STAKEHOLDER CONSULTATION AND PARTICIPATION IN ADB OPERATIONS

⁵ 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

⁶ 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>

5. Social Context of the Project Area

The Energy Valley Project comprises several components located across three governorates: Minya Governorate, Qena Governorate, and Alexandria Governorate. Given the geographic separation between the sites, the social context differs significantly between the Minya desert sites, the Naga Hammadi area, and the Abu Qir industrial / coastal setting

Key social aspects are summarised as follows:

- **Population:**

Minya components —Minya Hybrid PV+BESS and Consumer Substation/OHTLs: The Minya Hybrid PV+BESS site is located in the Eastern Desert of Minya Governorate, within a remote and uninhabited area. There are no residential settlements within or immediately adjacent to the Project footprint. The nearest residential settlement to the Hybrid site is New Minya City, located approximately 11.5 km west of the Project Site. The Hybrid grid connection OHTL is located approximately 9.5 km east of New Minya City, while the Consumer Substation and its connecting OHTL are located approximately 26 km north of the Hybrid grid connection OHTL. The nearest settlements to the Consumer Substation are Sarirya, El-Sawaita Village, and Ezbet El-Sheikh Hassan, located approximately 11 km, 12.5 km, and 13 km west of the site, respectively. Minya Governorate had an estimated population of approximately 6.51 million in 2025, with rural residents representing around 81% of the governorate population.

Naga Hammadi BESS + shared substation/OHTL: The Naga Hammadi BESS Project is located within the desert hinterland of Markaz Naga Hammadi, Qena Governorate, approximately 16 km southeast of Naga Hammadi town. There are no settlements within the Project Site. The nearest settlement is Baraka Village, located approximately 2.8 km northwest of the Project Site. The Project is located within / adjacent to the Dandara PV Project area, with the Obelisk PV Project located approximately 2 km southwest, the Nile Valley approximately 11 km north, and Qena City approximately 45 km northeast. Qena Governorate has a population of approximately 3.16 million, while Markaz Naga Hammadi has a population of approximately 578,237, with males representing 51.07% and females 48.92%. (CAPMAS 2017)⁷

Abu Qir BESS: The Abu Qir BESS site is located within Montazah II District, Alexandria Governorate, on land owned by the Abu Qir Power Plant. The nearest residential area is Ezbet El Setin, located approximately 100 m east of the Project Site. The site is within a mixed industrial, agricultural and coastal setting, with Abu Qir Power Plant adjacent to the west, agricultural land and drainage features to the east, El Tabia–Rashid Road and Abu Qir railway line to the south, Rakta Canal approximately 65 m south, and the Mediterranean Sea approximately 180 m north. Alexandria Governorate had a population of approximately 5.62 million in 2025, while Montazah II District had a population of approximately 585,005.

- **Labour Education:**

Minya components: Minya Governorate includes primary, preparatory and secondary education schools, in addition to one public university and two private universities. More than half of unemployed persons in Minya Governorate are of intermediate technical education level, while around 21% are university graduates, indicating the relevance of

⁷ Latest official census published in Egypt

technical and vocational skills development and local recruitment planning for construction and operation activities.

Naga Hammadi BESS + shared substation/OHTL: 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.

Abu Qir BESS: Alexandria Governorate has a relatively high literacy rate compared with the Upper Egypt project locations. According to the Abu Qir ESIA, the literacy rate in Alexandria Governorate is approximately 82%, while Montazah II District has a literacy rate of approximately 88%. This indicates a relatively favourable education context for local recruitment, training and stakeholder communication.

- **Employment:**

Minya components: Minya's economy is strongly influenced by agriculture, informal employment, construction, retail and family-owned trades, with agriculture employing a considerable portion of the labour force. A total labour force of approximately 1,670,700 in 2016, of which around 1,475,800 were employed and 194,900 unemployed, with an unemployment rate of approximately 11.6%. Female participation in the workforce is relatively low, at around 29%.

Naga Hammadi BESS + shared substation/OHTL: In Qena, the total workers across all occupations are 927,102. In Markaz Nagaa Hammadi, the total workers across all occupations is 182,449. In both Qena and Nagaa Hammadi, males predominantly occupy roles in elementary occupations⁸, plant and machine operations, and skilled occupations while females are more concentrated in service and sales, as well as clerical support roles.

Abu Qir BESS: The Abu Qir site is located in Montazah II District, which includes a variety of economic activities such as agriculture and fishing, manufacturing, commerce, transportation and storage, and services. Unemployment in Alexandria Governorate is around 8.1%, with female unemployment significantly higher than male unemployment. The nearby industrial and service-based economy may provide opportunities for local hiring, services and supply chain support during construction and operation.

- **Health facilities:**

Minya components: Markaz El Minya includes five governmental hospitals and six private hospitals, including general, chest, ophthalmology, infectious disease and multi-specialty facilities. These facilities provide the broader healthcare context for the Minya Hybrid PV+BESS and Consumer Substation/OHTL components, although emergency planning should also consider site distance, transport time, ambulance access and first-aid capacity at site level.

Naga Hammadi BESS + shared substation/OHTL: 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 Hiw and El Baraka villages as well as one hospital (Aluminum hospital) north of the proposed project site.

Abu Qir BESS: The site is located in Alexandria which has a highly accessible network of healthcare infrastructure and also has emergency services and is served by numerous emergency healthcare facilities.

⁸ Simple and routine tasks which mainly require the use of hand-held tools and often some physical effort

- **Infrastructure:**

Minya components: The Minya Hybrid site is accessed through the regional road network serving Minya Governorate, including the Cairo–Assiut Desert Road and Ras Gharib–Minya Road. Minya Governorate includes approximately 1,828 km of main paved roads and 565 km of unpaved roads. The nearest power substation to the Hybrid site is New Al-Minya Substation, located approximately 9.7 km from the Project Site. The Consumer Substation and OHTL components are also accessed through regional corridors including Ras Gharib–Minya Road, Minya–Assiut Road and the Assiut–Cairo Desert Road.

Naga Hammadi BESS + shared substation/OHTL: The Giza - Luxor Road passes approximately 3.3 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. The area also benefits from existing electricity transmission infrastructure, including the Naga Hammadi transmission corridor, and the Project will connect through an approximately 1 km 220 kV OHTL LILO arrangement between the Naga Hammadi Industrial Zone Substation and Obelisk Substation

Abu Qir BESS: The Abu Qir site has good access to existing infrastructure. It is located approximately 50 m from El Tabia–Rashid Road and approximately 40 m from the Abu Qir railway line. The site is also adjacent to Abu Qir Power Plant, with nearby utilities and infrastructure including agricultural drains, Rakta Canal, the Mediterranean coast, and existing industrial / power infrastructure.

- **Drinking water:**

Minya components: Minya Governorate relies on both surface water and groundwater sources. There are 80 surface water stations and 119 groundwater stations, with total water production of approximately 287.7 thousand m³/day and total consumption of approximately 186.7 thousand m³/day in 2015/2016. For the Project, construction and operation water will be supplied through licensed / approved water sources and transported to site by tanker where required.

Naga Hammadi BESS + shared substation/OHTL: 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.

Abu Qir BESS: Montazah II District has a high level of potable water service coverage. According to CAPMAS 2017 data, approximately 96% of the district population is connected to the public potable water network, while approximately 4% is not connected.

- **Sewage:**

Minya components: Approximately 25% of the population in Minya Governorate has access to sewage systems, while approximately 13% has no access to sanitation; the remaining population mainly depends on open-bottom tanks or septic tanks.

Naga Hammadi BESS + shared substation/OHTL: 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.

Abu Qir BESS: Montazah II District has relatively high sanitation coverage. According to CAPMAS 2017 data, approximately 91% of the district population is connected to the public sanitary sewer network, while approximately 9% is not served.

- **Cultural heritage:**

Minya components: Minya Governorate is rich in cultural heritage, with 39 recorded archaeological sites. However, there are no known or indicated archaeological sites within the East Minya Region. The nearest archaeological sites to the Minya Hybrid PV+BESS site are Beni Hassan Rock-Cut Tombs and Tal El Amarna, located approximately 14 km and 41.5 km southwest of the Project, respectively. The 2018 SESA for the NREA East Minya concession did not identify any known archaeological, historical or cultural heritage sites within the concession area or within a surrounding buffer of more than 5 km from its boundaries.

Naga Hammadi BESS + shared substation/OHTL: 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. However, several archaeological sites and monuments are located in the wider area, including Abu Amuri, Hur and Hiw, several kilometres from the site, while Ancient Thebes and its Necropolises is located further away to the south.

Abu Qir BESS: There are no registered ancient remains or cultural heritage sites within or near the Project Site. However, several registered archaeological sites are located within approximately 10 km of the site, including Kom El-Dahab approximately 5 km south, and the Roman Bath / Bath of Cleopatra, Tabyet El-Raml, and Abu Qir–Menouthis approximately 8 km west.

6. 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)⁹, 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. The ESIs indicate that cumulative impacts associated with the Energy Valley Project components are expected to be insignificant and are not expected to materially expand the stakeholder identification scope beyond the direct and indirect AOIs identified for each site.

For the Minya components, including the Minya Hybrid PV+BESS Facility, the grid connection OHTL, the Consumer Substation and its connecting OHTL, cumulative impacts are expected to be insignificant. This is mainly due to the substantial difference in scale, workforce requirements, construction intensity and footprint between the Hybrid Facility and the Consumer Substation/OHTL components. The Hybrid Facility represents the dominant

⁹ 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

construction activity in the Minya area, while the Consumer Substation and associated OHTLs involve a much smaller footprint, shorter-duration works and a significantly smaller workforce. In addition, the Consumer Substation is located approximately 25–26 km north of the Hybrid Facility, which limits the potential for interaction between the components in relation to localized receptors such as air quality, noise, land use, biodiversity and nearby communities. The main potential cumulative pathways are therefore limited to shared traffic/logistics routes and potential workforce influx/accommodation pressures, particularly in the unlikely event of overlapping peak construction activities.

For the Naga Hammadi component, cumulative impacts with the nearby Dandara and Obelisk projects are also expected to be insignificant. The Naga Hammadi BESS, shared substation and OHTL are relatively limited in footprint and workforce requirements when compared with the neighbouring Dandara and Obelisk PV developments, with the Obelisk project is at final stage. Potential cumulative effects are therefore expected to be mainly limited to traffic/logistics and workforce management, and these will be addressed through coordination with neighbouring projects, local hiring, worker Code of Conduct, traffic management and labour influx management measures.

For Abu Qir, cumulative interaction with the wider Energy Valley programme is not expected due to the geographic separation between Abu Qir and the other Project components located in Minya and Naga Hammadi / Qena. The relevant cumulative context for Abu Qir is therefore the existing local industrial baseline, including Abu Qir Power Plant and other nearby industrial facilities. The incremental contribution of the Abu Qir BESS is expected to be limited, as construction activities will be temporary and localized, the peak workforce is expected to be limited, and workers are expected to commute from existing residential areas rather than being accommodated in a dedicated camp near local communities.

Accordingly, stakeholder identification focuses on stakeholders potentially affected by each site-specific AoI, including nearby communities, workers, road users and communities along transport routes, local authorities, emergency responders, utility providers, neighbouring projects/facilities, and stakeholders potentially affected by OHTL routes or right-of-way restrictions.

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 low-income 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.

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.

6.1 Stakeholder Analysis

A preliminary stakeholder analysis was conducted to assign importance to stakeholders, understand their roles with respect to the project, and help identifying their engagement approach. It uses neutral engagement considerations, including whether the stakeholder may be affected by Project activities, has specific interests such as employment, local procurement, land access or safety, has a formal mandate or technical interface with the Project, or requires periodic information disclosure and feedback.

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

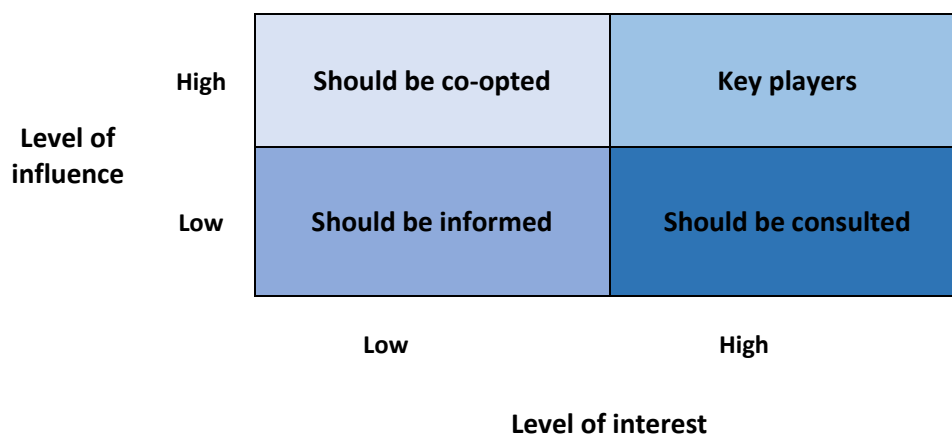


Figure 3: Stakeholders' categorization

The following engagement considerations have been used to guide the stakeholder engagement strategy.

Engagement consideration	How it is reflected in the SEP	Stakeholder groups	Typical engagement methods
Potential exposure to Project activities or impacts	Early information disclosure, consultation, safety messaging, accessible grievance channels and feedback reporting are prioritized for groups that may experience direct or indirect Project interactions.	Local communities/residents, adjacent land users, road users, workers and vulnerable groups.	FGDs, one-on-one meetings, site briefings, grievance mechanism outreach.
Project-related interests and expected benefits	The SEP identifies practical interests such as local jobs, transparent recruitment, local services and procurement, skills development, community health and safety, and social inclusion.	Local communities, local businesses, labour offices, NGOs, education and training institutions.	Disclosure of labour needs, meetings with labour offices, supplier outreach and social media announcements.
Formal mandate, permitting or technical interface	Stakeholders with statutory, permitting, utility, emergency response, land-interface or construction coordination roles are engaged through focused coordination.	Government authorities, regulators, EETC, NREA, utilities, Civil Defence, Abu Qir Power Plant, Dandara/Obelisk interfaces.	Official correspondence, technical meetings and individual coordination meetings.
Finance, standards and monitoring requirements	Engagement provides evidence of alignment with lender E&S standards, ESAP commitments, monitoring requirements, reporting and disclosure obligations.	AfDB, EBRD, EIB, other lenders, lender advisors, partners, etc.	Formal submissions, lender meetings, progress reports and site visits.

Stakeholders have been identified considering the following factors:

- Project's nature and activities, including the Hybrid PV+BESS facility, BESS facilities, substations, OHTLs, access routes, construction logistics and associated/interface infrastructure;
- Geographical extension and location of the project components across Minya, Qena and Alexandria Governorates; and
- Environmental and Social aspects and potential impacts of the project.

Accordingly, the following preliminary key stakeholder groups have been identified in Table (2) below.

Table 2: Stakeholders Groups

Stakeholder Category	Stakeholders	Project relationship, interests, concerns and information needs
Primary Stakeholders		
Local Businesses & Industry	Small business owners in the nearest cities, towns and villages, including New Minya, Sarirya / Wadi El-Sarirya, Naga Hammadi, Baraka, Hiw, Abu Qir, El Tabia and Ezbet El Setin Neighbouring industrial and project facilities, including Sarirya Industrial Zone, Naga Hammadi light industries area, Dandara PV Project, Obelisk PV Project, Abu Qir Power Plant, and other nearby Abu Qir industrial facilities	Interests include opportunities to provide goods and services, local procurement and local content. Concerns may include access to procurement information, fair tendering, temporary traffic or construction disturbance, and clarity on Project needs. Engagement will focus on supplier outreach, Project updates and local content requirements.
Landowners, and adjacent land users	Relevant landholding / land-administering entities, including NREA, EETC, West Delta Electricity Production Company / Abu Qir Power Plant, Dandara-related land/interface parties, and any affected or adjacent land users. Adjacent agricultural land users near Abu Qir and any land users potentially affected by final OHTL routes or RoW restrictions.	Interests and information needs include land allocation, access restrictions, OHTL right-of-way requirements, and land-use near Project infrastructure. No physical or economic displacement is anticipated for the Minya Consumer Substation/OHTLs, Naga Hammadi, or Abu Qir BESS components. The Minya Hybrid site is government-allocated NREA land and PS5/PR5 is not expected to apply. Any land-related impacts associated with the final Abu Qir OHTL alignment will be assessed and managed by EETC, as required. Engagement will use targeted individual meetings and formal coordination
Interested organizations	NGOs, civil society organizations, youth and employment organizations, women-focused organizations, disability support organizations, environmental groups and community development associations in Minya, Qena and Alexandria Governorates.	Interests include community development, social inclusion, employment awareness, gender considerations, disability support, vulnerable groups, community health and safety, and grievance mechanism awareness. These organizations can provide local context, support access to concerned communities, and help identify safe and culturally appropriate engagement channels.
Local Communities/ residents	Minya: New Minya City, Sarirya, El-Sawaita Village, Ezbet El-Sheikh Hassan, Zawya Sultan Basha, and communities along transport routes. Naga Hammadi: Baraka Village, Hiw, Naga Hammadi town, and communities along access routes. Abu Qir: Ezbet El Setin, El Tabia, nearby agricultural land users, and communities along El Tabia–Rashid Road and other access routes	Interests include local job opportunities, transparent recruitment procedures, access to local services and business opportunities, road safety, worker conduct, dust and noise management, emergency preparedness, access restrictions, security arrangements and accessible grievance channels. Community leaders and informal representatives may support information sharing and feedback collection.
Workers	Employees of the developer and the contractors	Interests include occupational health and safety , fair working conditions, accommodation and transport arrangements, workers' Code of Conduct, worker grievance mechanism, training, and direct and indirect employment benefits.

Stakeholder Category	Stakeholders	Project relationship, interests, concerns and information needs
Vulnerable groups ¹⁰	Women groups, disabled groups, elderly groups, etc..	Interests include safe access to Project information, fair access to employment opportunities where skills match, accessible grievance channels, protection from GBV/SEA/SH risks, inclusive participation, and engagement methods that address mobility, literacy, cultural and digital-access barriers.
Secondary Stakeholders		
National Regulators/ agencies & Permitting Authorities	NREA, EEA, Waste Management Regulatory Authority (WMRA), and other relevant competent administrative authorities	Responsibilities and information needs include permitting, approvals, E&S compliance, environmental monitoring, waste management oversight and verification that Project commitments are implemented.
Other relevant agencies	Egyptian Electricity Transmission Company Ministry of Transport (roads and bridges Authority), Water and Wastewater company, Egyptian Electric Utility and Consumer Protection Regulatory Agency, Ministry of Electricity and Renewable Energy, Ministry of Environment, Ministry of Tourism and Antiquities, Civil Defence, ambulance services, local labour offices, Abu Qir Power Plant / West Delta Electricity Production Company, Dandara and Obelisk project interfaces	Interests and information needs relate mainly to utilities and infrastructure interfaces, including OHTLs, substations, road access, heavy vehicle movements, railway proximity, water and wastewater services, emergency response, fire safety, labour recruitment, coordination with neighbouring projects/facilities, cultural heritage chance finds and waste management
Local Government	Minya Governorate, relevant local units in Markaz El Minya / New Minya / Sarirya area; Qena Governorate, Markaz Naga Hammadi and relevant village/local units; Alexandria Governorate, Montazah II District, Abu Qir / El Tabia local authorities and relevant local administrative units.	Interests include public service coordination, construction permits, local security coordination, utility services, employment announcements, receipt of applications from communities, maximizing local benefits and supporting measures to manage adverse impacts.
Healthcare Providers and emergency services	Main hospitals, healthcare units, ambulance services, Civil Defence and emergency responders serving Minya, Qena / Naga Hammadi and Alexandria / Abu Qir areas.	Information needs include workforce size, construction timing, site access, emergency response procedures, ambulance access, fire safety coordination and potential community health and safety issues.
Media	National and local mass media and newspapers	Channel to disseminate information; key public opinion influencers.
Education institutions and labour / training entities	Universities, technical institutes, vocational training centres, technical schools, youth employment offices and labour offices in Minya, Qena and Alexandria	Interests include local hiring, vocational training, technical capacity building, awareness, internship opportunities and workforce development for renewable energy, BESS, electrical works, OHTL and substation-related skills.
Lenders / Development Finance Institutions and Partners	AfDB, EBRD, EIB, Norfund and other current or potential lenders / lender advisors	Require evidence of alignment with applicable international E&S standards, disclosure requirements, ESIA/SEP review, ESAP commitments, monitoring, reporting, incident notification and financial close requirements. Engagement will be through due diligence, formal submissions, meetings and periodic reporting.

Preliminary stakeholder mapping is presented in Table 3 , and will continue to be reviewed throughout the project life. Engagement methods were selected using the neutral considerations above, taking into account each group's relationship to the Project, potential exposure to impacts, information needs and coordination role.

- Individual meetings are used for stakeholder with formal mandates, technical interfaces, land/access matters, workforce responsibilities, lender requirements or specific issues requiring focused coordination.
- Focus Group discussions are selected to interact with stakeholders characterized by a large number and a relative homogeneity.
- Fact sheets, leaflets, social media posts and official correspondence can be used to interact with secondary stakeholders.

¹⁰ Specific vulnerable groups will be identified as the Project development proceeds

Table 3: Stakeholder Engagement Approach

Stakeholder Category	Approach	Engagement Method
Local Businesses & Industry	To be consulted	Focus group discussions
Landowners, and adjacent land users	To be consulted	Individual meetings
NGOs	To be informed	Focus group discussions
Local Communities residents/ community)	To be consulted	Focus group discussions
National Regulators/ agencies & Permitting Authorities	To be co-opted	Individual meetings
Agencies overseeing Associated activities	Key players	Individual meetings
Local Government	Key players	Individual meetings
Healthcare Providers	To be informed	Fact sheets/ leaflets and official correspondence
Education institutions	To be informed	Fact sheets/ leaflets and official correspondence
Media	To be informed	Focus group discussions
Workers	Key players	Individual meetings
Vulnerable groups	To be Consulted	Focus group discussions
Lenders / Development Finance Institutions and Partners	Key players	Individual meetings

7. 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.

7.1 Previous Engagement during the Scoping and ESIA stages

Initial stakeholder engagement activities were initiated at the scoping and ESIA stage. A proportionate engagement approach has been adopted for the Energy Valley Project, taking into account the scale, footprint, location, sensitivity and expected impacts of each project component. Accordingly, engagement activities to date have been more extensive for the Minya components, particularly given the scale of the Hybrid PV+BESS facility and the number of expected construction workers. Engagement has also been undertaken for the Naga Hammadi and Abu Qir components, although to a more targeted extent, reflecting their smaller footprints, more limited workforce requirements and generally site-specific impacts.

Following Table (4) presents a brief summary of the stakeholders engagement activities to date. Annex 1 presents the detailed stakeholders meetings. Stakeholder engagement is an ongoing process and will continue throughout the Project lifecycle. The SEP will be updated periodically to reflect additional engagement activities, stakeholder feedback, emerging issues, and any changes to the Project or its Area of Influence.

Table 4: Summary of the stakeholders engagement activities to date

Project location	Stakeholders	Key issues discussed and outcomes
Minya components: Minya Hybrid, Consumer Substation and OHTLs	EEAA Central EIA Department; Minya Governorate; General Secretary of Minya Governorate; Minya Governor; Minya City Council; Samalout City Council; New Minya Urban Authority; Minya Water and Wastewater Company; EEAA Minya Regional Branch Office; Head of Environmental Departments; General Agency of Public Property Protection; NGOs; informal agricultural operators previously present within parts of the East Minya site.	Engagement focused on the national EIA categorization of the Project components, Project orientation, land status, land clearance history, water supply capacity, wastewater treatment capacity, waste management capacity, labour availability, recruitment procedures, worker accommodation, transport routes, community health and safety, grievance mechanism, and potential role of NGOs. The EEAA advised that the Project components are categorized as Scoped-B under the national EIA system. Consultations with Minya authorities confirmed the need for early coordination on water supply, wastewater disposal, waste management and labour recruitment. Discussions with Governorate representatives also confirmed support for the Project, including facilitation of recruitment through the Youth Employment Administration and support for road access improvements where required.
	Informal agricultural operators at the East Minya site; General Agency of Public Property Protection – Minya Governorate.	Discussions confirmed that some agricultural operators had informally used parts of the East Minya site since around 2023, although the land had been allocated to NREA for renewable energy development since 2016. Operators reported receiving warnings / notifications from the Governorate from January 2025, although some stated that they had not received prior warnings before clearance campaigns. The General Agency of Public Property Protection confirmed that the land clearance was part of a wider Governorate campaign to recover public lands from illegal encroachments, and that no reconciliation or compensation was considered because the NREA concession was already allocated for a planned public use.
	Minya City Council; Minya Water and Wastewater Company; New Minya Urban Authority; NGOs; local labour-related stakeholders.	Discussions confirmed that Project water requirements should be coordinated in advance with the Minya Water and Wastewater Company, as supply may need to be planned from more than one water treatment plant. The Talla wastewater treatment plant was identified as having capacity to accommodate peak construction wastewater volumes, subject to coordination. New Minya City was identified as a suitable area for potential worker accommodation because of available housing and urban services, while accommodation in smaller villages was not preferred. Engagement also highlighted the importance of formal recruitment through the Governorate labour office, maximizing local hiring, avoiding pressure on local housing, and applying workers' Code of Conduct and GBV/SH prevention measures.
	Head of Samalout City; Local Unit of Beni Khaled Village; Sarirya community leaders.	Engagement focused on introducing the Consumer Substation location, confirming key stakeholders around Sarirya, establishing a communication framework, explaining hiring procedures, and confirming that contractors will be requested to prioritize qualified residents from neighbouring villages where feasible. The Project grievance mechanism was also presented, and CLO contact details were shared to facilitate direct communication and complaint submission.
Abu Qir BESS – Alexandria Governorate	Alexandria Vice Governor Assistant; Abu Qir Power Plant representatives.	Engagement focused on introducing the Abu Qir BESS component, explaining the Project's hiring strategy, local employment approach, and grievance mechanism. The Vice Governor Assistant expressed willingness to support the Project and requested a consolidated proposal on stakeholder engagement recommendations for presentation to the Governor. Engagement with Abu Qir Power Plant focused on coordination with the landowner /

Project location	Stakeholders	Key issues discussed and outcomes
		adjacent facility and identification of neighbouring stakeholders, including Abu Qir Petroleum, Abu Qir Gas / GASCO, Petrojet, nearby families and other adjacent entities.
Naga Hammadi BESS – Qena Governorate	Community representatives; local mayors; government officials; representatives of the industrial zone; heads of local families; other Naga Hammadi stakeholders.	Consultations indicated a generally positive perception of Scatec and support for continued investment in the area. Given the limited scope of the Naga Hammadi BESS component compared with neighbouring projects, stakeholder interest is currently relatively low. Employment opportunities were the main topic of interest, with stakeholders emphasizing the importance of fair and transparent recruitment from surrounding communities where jobs become available. No major concerns, objections or project-related grievances were raised. Continued periodic engagement was recommended to keep stakeholders informed and manage expectations regarding Project scope, timeline and potential employment opportunities.

7.2 Stakeholders Engagement Plan

The Project will mobilize resources consisting of an E&S manager headquartered in Cairo, frequently visiting the site and a stakeholder engagement team led by one full-time community liaison officer (CLO), that will be based in Minya where the main project activities, and largest workforce interface are expected. The Minya-based CLO will cover Minya, Naga Hammadi and Abu Qir through planned site visits, direct engagement and coordination with local authorities, interface entities and community representatives. In Naga Hammadi, the Project will use part-time/local support from Obelisk's community liaison personnel, where feasible and agreed, to support meeting arrangements, local follow-up and information sharing. The number of Obelisk liaison personnel providing part-time support will be confirmed before construction and recorded in the updated stakeholder register. 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.

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

7.2.1 Stakeholder Engagement channels

The following communication channels would be used

Mechanism	Description
Social media	Official social media channels of the relevant Governorates and local authorities may be used to disseminate key Project information, including Minya Governorate, Qena Governorate, Alexandria Governorate, and relevant local units / city councils if possible. Social media may be used for disclosure announcements, job advertisements, GRM information, and updates on engagement activities.
Press Release via Company	The company project website, which contains key project information and updates. Updates on the project can be found at https://www.scatec.com/en/scatec-signs-landmark-ppa-in-egypt-for-1-95-gw-solar-and-3-9-gwh-bess-capacity/
Flyers (Factsheets)	Job vacancies and other project information will be posted at the governorate webpage and local labour offices, NGOs and social media
Face-to-face (one on one)	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.
Focus Group Discussions (FGDs) with vulnerable groups	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. Potential barriers to participation may include literacy limitations, limited digital access, mobility constraints, cultural norms affecting women's participation, fear of retaliation, limited access to formal meetings, or lack of awareness of available grievance channels. To address these barriers, the Project will implement differentiated engagement measures, including: • using Arabic language and simple non-technical wording in disclosure materials; • using verbal briefings, visual materials and infographics where literacy may be

Mechanism	Description
	limited; • holding meetings at accessible locations and suitable times; • organizing targeted small-group meetings or women-only meetings where appropriate; • engaging through trusted local NGOs, community representatives, labour offices and local units; • allowing women to report sensitive grievances to a female representative where feasible; • ensuring that GBV/SEA/SH-related grievances are handled confidentially and safely; and • monitoring participation of vulnerable groups through the SEP monitoring indicators. These measures will be applied in a proportionate manner depending on the site context and the level of stakeholder interest and potential impact.

In addition to the above, a Grievance form related to recruitment policies and procedures will be disclosed at key locations such as local municipality office, NGOs, and private sector/professional, organizations as well as the project website. The CLO will be responsible to regular follow up with the different points to collect the complaints.

7.2.2 Stakeholder Engagement Resources

The implementation of the SEP requires a systematic and proportionate approach to inform, engage and take onboard feedback from stakeholders and revise the plan, as necessary. The Developer will assign one full-time CLO based in Minya near the main activities, supported by the Project E&S Manager and HR team. The Minya-based CLO will also cover Naga Hammadi and Abu Qir through planned visits and remote follow-up. In Naga Hammadi, part-time/local support from Obelisk's community liaison personnel will be used where feasible and agreed to facilitate local engagement. The number of part-time support personnel will be confirmed before construction and recorded in the SEP update. For Abu Qir, engagement will be supported by the CLO's periodic visits and coordination with Alexandria local authorities, Abu Qir Power Plant / West Delta Electricity Production Company and other interface entities. .

The CLO is responsible for day-to-day management and face-to-face community engagement. The CLO will be a central point of contact in Minya, Naga Hammadi and Abu Qir. CLO will undertake the engagement activities to build and maintain robust relationships with local residents, businesses, NGOs and other stakeholder groups. The CLO will also be responsible for ensuring that the Community Feedback Procedure is active and effective.

The CLO will undertake the following responsibilities:

- Address any grievances expressed by the local communities through the GM.
- Identify any significant new E&S issues that may arise as the project progresses.
- Maintain records relating to consultations.
- Prepare internal and external reports 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 (5) below presents the roles and responsibilities for the SEP implementation.

Table 5: Roles and responsibilities for SEP implementation

Responsible Party	Roles and Responsibilities
Project Management	– Oversee the overall implementation of SEP, including frequent interfacing with CLOs. – Ensure resources required (budgetary, human, and logistical resources) are available for the implementation of the SEP – Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.
E&S manager	– Regularly update the SEP and Grievance Mechanism – Implement and monitor stakeholder information exchange and participation strategies. – Reporting to project management – Government and lenders liaison
Community Liaison Officer (CLO)	– Participate in the update the SEP as required during the project's lifetime, to include planning, construction, operation, and decommissioning. – Overall responsibility for implementing the requirements of the SEP plan – Interaction with the community – Undertaking monthly internal audits and Reporting to E&S management – Coordinate with the EPC Contractor's team
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 2 presents a template of the proposed register.

7.2.3 Stakeholder Engagement Communication Action Plan

Table 6, below presents the timing of engagement for the different stakeholders with respect to the project phases. In addition, Table 7 presents the stakeholder specific communication action plan and Table 8 provides a summary matrix linking priority E&S issues to target stakeholders, methods, participatory activities, expected outcomes, KPIs, responsibilities, timelines and the relevant SEP budget lines.

Table 6: Timing of engagement for the different stakeholders

Stakolders	Design stage	Implementation stage	Monitoring stage
Local Businesses & Industry	✓	✓	X
Landowners, and adjacent land users	✓	✓	✓
NGOs	✓	✓	X
Local Communities residents	✓	✓	✓
National Regulators/ agencies & Permitting Authorities	✓	✓	X
Ministry of transport – roads and bridges	X	✓	X
EETC	✓	✓	✓
Abu Qir Power Plant and Dandara / Obelisk interface parties	✓	✓	✓

Stakolders	Design stage	Implementation stage	Monitoring stage
Water, wastewater, waste management and utility service providers	✓	✓	✓
Local Labour Offices	✓	✓	✓
Healthcare providers and emergency services	✓	✓	✓
Education institutions / technical and vocational training entities	✓	✓	✓
Lenders / Development Finance Institutions and Partners	✓	✓	✓

Table 7: Stakeholders communication Action plan

Stakeholder	Potential issues/ concerns	Key messages	Communication mechanism	Frequency	Responsibility	Project Phase
Primary Stakeholders						
Local Businesses & Industry	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 pre-construction, with relevant supplier and contractors Ad-hoc as needed during construction	Relevant developer team, CLO	Preparation, Construction
Landowners, and adjacent land users	Land allocation, land access, OHTL RoW restrictions, legal documentation	Disclose information on project and confirm land allocation	Individual meetings	Once pre-construction	Relevant developer team, CLO	Preparation, Construction
NGOs	Community investment initiatives. Assistance with outreach to vulnerable groups	Project information and disclosures, potential CSR activities 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	Preparation, Construction, Operation
Workers	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	Construction, Operation
Local Communities residents/ community)	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	Preparation, Construction, Operation
Secondary Stakeholders						
Regional/ Local Government	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	Preparation, Construction, Operation
NREA	Issuance of operation permits	Disclose information on project updates and development	One-on- one meetings, written formal correspondence	– During ESIA development – Issuance of operation permit and as required	E&S manager and other Developer team as relevant	Preparation, Construction, Operation

Stakeholder	Potential issues/ concerns	Key messages	Communication mechanism	Frequency	Responsibility	Project Phase
EEAA	ESIA approval , project follow up and ESMP inspection	Disclose information on project updates and development	One to one meetings, written formal correspondence,	- At the scoping and ESIA preparation - Biannually or as required	Developer E&S manager	Preparation, Construction, Operation
Interface entities (Abu Qir Power Plant and Dandara / Obelisk)	Land/interface coordination, access, emergency response, security, construction overlap, cumulative traffic and workforce management	Disclose Project schedule, site access requirements, emergency response coordination and cumulative impact management.	One-on-one meetings, technical coordination meetings, official correspondence	- Pre-construction - Quarterly during construction - As needed during operation.	Developer project team, E&S Manager, HSSE team, CLO	Preparation, Construction, Operation
Local Labour office	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	Preparation, Construction, Operation
Healthcare service providers	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	Preparation, Construction, Operation
Education providers (specifically technical /vocational training institutes)	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	Preparation, Construction, Operation
Other Agencies relevant to utilities: Ministry of Transport (roads and bridges Authority) Local Water and wastewater company	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	Preparation, Construction
Media	Public information, disclosure announcements, employment announcements, grievance mechanism awareness.	Provide accurate and timely Project information, disclosure notices, community engagement announcements	Press releases, media briefings, official statements, social media posts	At disclosure milestones; before major construction activities; as required	Developer project team, E&S Manager, CLO	Preparation, Construction, Operation
Lenders / Development Finance Institutions and Partners	ESIA/SEP review, disclosure, ESAP commitments, lender requirements, monitoring, E&S performance reporting, stakeholder engagement effectiveness.	Provide Project updates, GRM performance, monitoring reports, incident notifications and evidence of stakeholder engagement implementation	Individual meetings, FGDs, written responses, progress reporting, formal submissions	During due diligence; Quarterly during construction; periodically during operation.	Developer project team, E&S Manager, HSSE team, CLO	Preparation, Construction, Operation

Table 8: Priority E&S issue engagement summary matrix

Priority E&S issue	Project phases	Target stakeholders	Disclosure / consultation methods	Participatory activities and expected outcomes	KPIs	Responsibility, timeline and budget link
Local employment and recruitment	Preparation, construction and operation	Local communities, local businesses, labour offices, youth employment administrations, education/training institutions, workers and contractors.	Job announcements, labour-office coordination, community meetings, factsheets and social media posts.	Disclose labour needs, required skills, recruitment channels and prohibition of informal hiring at the gate. Outcome: transparent recruitment and managed expectations on available jobs and local content.	Number of job announcements; number of local applicants; local hires where data are available; recruitment-related grievances opened/closed.	E&S Manager, CLO, HR, EPC. Before recruitment and during construction/operation. Budget: SEP updates, Arabic disclosure materials, meetings and monitoring lines.
Worker influx, accommodation and Code of Conduct	Preparation and construction	Workers, contractors, local communities, NGOs, local authorities, accommodation providers and vulnerable groups.	Worker induction, toolbox talks, community meetings, accommodation briefings, Code of Conduct disclosure and grievance channels.	Consult on accommodation, transport, worker conduct, GBV/SEA/SH prevention and avoidance of pressure on small communities. Outcome: reduced worker-community risks and clear behaviour expectations.	Number of inductions/toolbox talks; workers trained on Code of Conduct; worker/community grievances related to conduct or accommodation; corrective actions closed.	HSSE Team, EPC, CLO, E&S Manager. Prior to mobilization and throughout construction. Budget: meetings, GRM, targeted vulnerable-group engagement and monitoring lines.
Land access and OHTL right-of-way restrictions	Preparation, construction and operation/maintenance	Land-administering entities, adjacent land users, EETC, NREA, West Delta Electricity Production Company/Abu Qir Power Plant, local authorities, agricultural land users near Abu Qir and communities along final OHTL routes.	Individual meetings, formal correspondence, technical coordination meetings, site notices and GRM disclosure.	Confirm land allocation, access arrangements, safe land use, OHTL RoW restrictions and any EETC-managed land matters. Outcome: documented interfaces and early management of access concerns.	Number of coordination meetings; documented agreements/permits; land/access grievances.	Developer project team, E&S Manager, CLO, EETC/asset owner as relevant. Before land access and during works/maintenance. Budget: meetings, CLO travel and monitoring lines.
Community health, safety and security	Preparation, construction and operation	Local communities, road users, schools/training entities where relevant, local authorities, police/security, Civil Defence, ambulance services, Abu Qir Power Plant and neighbouring/interface facilities.	Community meetings, safety briefings, social media, signage, press releases where needed, emergency-response coordination meetings and GRM outreach.	Discuss road safety, site access, security conduct, emergency preparedness, electrical safety near substations/BESS/OHTLs and construction disturbance. Outcome: better awareness and coordinated emergency response.	Number of safety briefings; emergency coordination meetings; traffic/safety grievances; incidents communicated and closed; participation by women and vulnerable groups where relevant.	HSSE Team, E&S Manager, CLO, EPC, Civil Defence/ambulance. Before major construction activities and periodically during operation. Budget: meetings, Arabic materials, GRM, travel and monitoring lines.
Environmental management	Preparation, construction and operation	Local communities, adjacent land users,	Disclosure materials, community meetings,	Disclose and consult on dust, noise, waste,	Number of E&S disclosure activities; environmental	HSSE Team, E&S Manager, CLO, EPC. Before works and

Priority E&S issue	Project phases	Target stakeholders	Disclosure / consultation methods	Participatory activities and expected outcomes	KPIs	Responsibility, timeline and budget link
		regulators, utilities, waste contractors, NGOs, workers and neighbouring facilities.	regulator correspondence, site briefings and GRM channels.	wastewater, water supply, drainage/dewatering, hazardous materials and pollution prevention. Outcome: stakeholders understand controls and can report nuisance or pollution concerns.	grievances by topic; monitoring reports prepared; corrective actions closed; waste/water coordination records.	throughout construction/operation. Budget: SEP updates, meetings, GRM and monitoring lines.
Vulnerable groups and social inclusion	Preparation, construction and operation	Women, elderly persons, persons with disabilities, low-income groups, unemployed youth, illiterate persons, NGOs and community representatives.	Small-group meetings, women-focused meetings where appropriate, verbal briefings, simple Arabic materials, visual materials, trusted NGOs/local units and safe grievance channels.	Identify barriers to participation and provide accessible engagement, including confidential GBV/SEA/SH channels. Outcome: inclusive access to information, feedback and grievance mechanisms.	Number of targeted meetings; participation disaggregated by gender where appropriate; vulnerable-group feedback; GBV/SEA/SH grievance handling arrangements verified; actions closed.	CLO, E&S Manager, NGOs/local representatives, HR. At least annually and when major engagement activities occur. Budget: targeted vulnerable-group engagement, Arabic materials, GRM and monitoring lines.
Cultural heritage and chance finds	Preparation and construction; operation if ground disturbance occurs	Workers, contractors, Ministry of Tourism and Antiquities, local authorities and communities where relevant.	Induction, toolbox talks, formal correspondence where required and chance-find procedure disclosure.	Communicate chance-find procedures before ground-disturbing activities. Outcome: workers know stop-work and notification requirements if cultural heritage is encountered.	Number of workers inducted on chance finds; chance-find incidents reported; notifications made where required; actions closed.	HSSE Team, E&S Manager, EPC, CLO. Before and during ground-disturbing works. Budget: Arabic materials, meetings and monitoring lines.
Grievance management and stakeholder feedback	Preparation, construction and operation	All external stakeholders, local communities, vulnerable groups, workers, contractors, NGOs, local authorities and lenders.	GRM forms, grievance boxes, hotline/WhatsApp/email, website, CLO outreach, induction and stakeholder meetings.	Explain how to submit grievances, anonymous options, response timelines, appeal options and confidential GBV/SEA/SH handling. Outcome: accessible and trusted feedback mechanism with tracked close-out.	Number of grievances received, open, resolved and closed; satisfaction with responses; grievance categories by location/gender where available; reporting frequency met.	CLO, E&S Manager, EPC/Operator, Project Management. Before implementation and throughout Project lifecycle. Budget: GRM implementation, monitoring/ reporting and CLO travel lines.

8. 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”¹¹. 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.

The response time between starting the investigation and reaching a resolution should be as short as possible.

A computerized database could also 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: Violence Against Women and Girls (VAWG), Gender-based Violence (GBV), Sexual Exploitation and Abuse (SEA) will be undertaken in accordance with the requirements set within the AfDB¹² ISS Best Practice Note addressing SEAH and GBV and EBRD¹³ 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.
- 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.

¹¹ IFC PS 2012, para. 35 (Grievance Mechanism for Affected Communities)

¹² https://www.afdb.org/sites/default/files/borrower_guidance_note_on_gender_in_es_safeguards.pdf

¹³ 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>

- 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 3 shows the proposed project's grievance mechanism system.

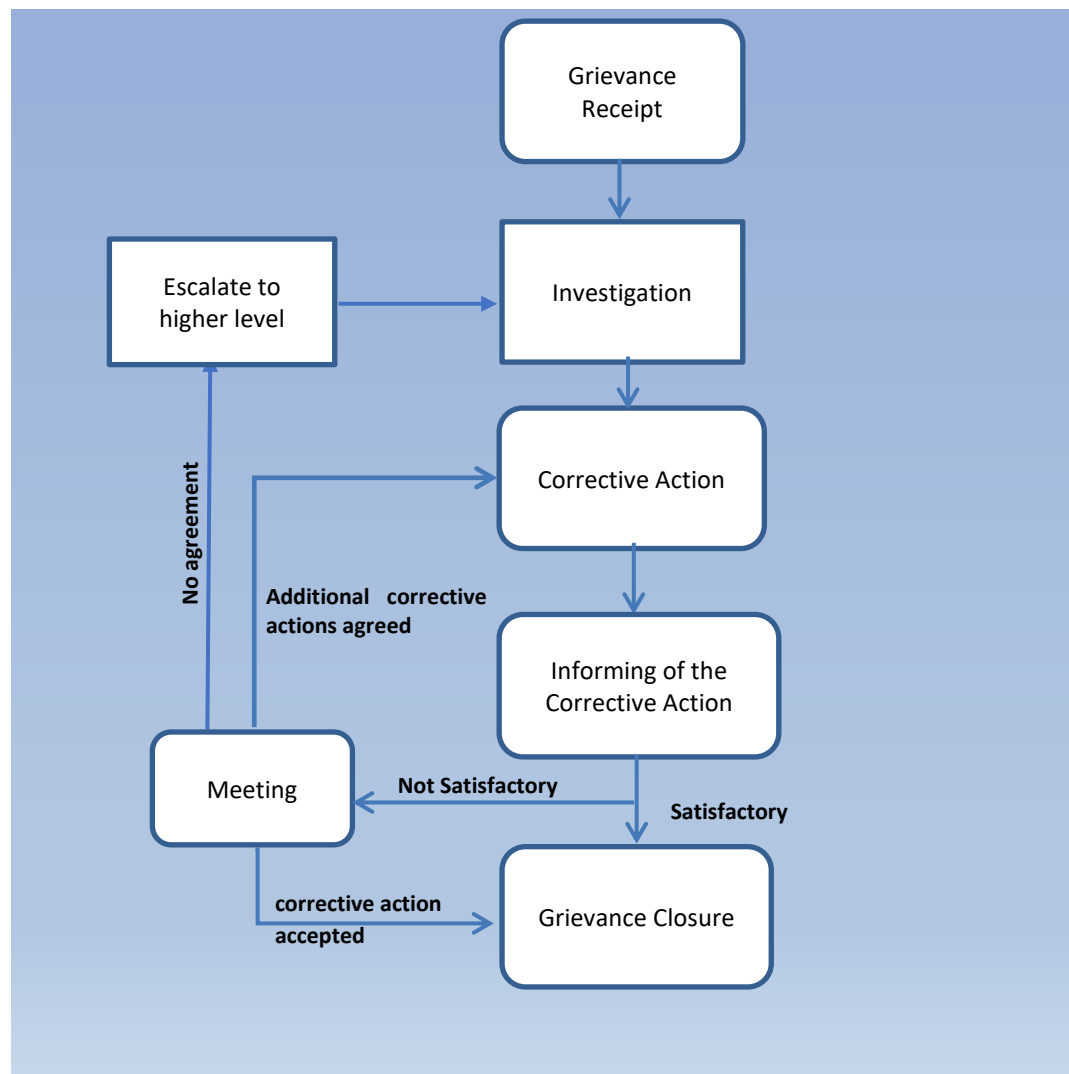


Figure 4: Proposed project's grievance mechanism system

- Grievances can be lodged in writing or verbally, as appropriate. The CLO will acknowledge receipt of the grievance (within maximum of 24 hours) and explain (in writing or verbally whichever is more appropriate) in brief the process of redress that will be followed, which depending on the case might need objective investigation, and specify the expected time for resolution, which might be case-sensitive but would not exceed 15 days.
- 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 (3) 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 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.

9. Workforce Grievance Mechanism

The Grievance mechanisms for workers will be separate from public grievance mechanisms. However, several key management principles apply to both communities' and workers' grievances. Workers grievance mechanism shall be developed to address issues or grievances raised by the Project workforce. The EPC and the sub-contractors will need to integrate the company grievance mechanism into their management systems. The company must ensure that the workers of subcontractors have access to a grievance mechanism. This may include placing contractual obligations on contractors to introduce and operate grievance mechanisms.

The EPC and subcontractor grievance mechanisms should be based on the same principles as those in this document and should be made available to all workers, even those employed on a short-term or temporary basis.

All workers should be made aware of the grievance mechanism at the time of hiring. Details of how it operates – including up-to-date contact points – should be readily accessible (for example, in staff handbooks and on notice boards)

The requirements of the workers grievance mechanisms should as minimum include:

- Accessibility to all workers,
- Allow for confidential complaints and those requiring special protection measures, such as reports of gender-based violence
- Responsiveness, i.e. resolving grievances in the shortest possible delay
- Non retaliatory and allows for possible anonymity
- Allows for escalation to higher echelons of the organization

The mechanism will allow access to the project owner for auditing and follow up purposes

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 regular stakeholder engagement meetings. During these meetings, community members will be asked for feedback on the stakeholder engagement program. The indicators that will be used to monitor the implementation of the SEP will include, but not be limited to 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 community 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. Stakeholder engagement activities and significant changes or updates in the project, stakeholders' concerns, as well as environmental and social issues will be continuously reported and published to a wider audience in a transparent way through public domain documents.

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

All action plan requirements at completion of construction and during operations, the project will consider preparing an Annual Report¹⁴ 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.

10.3 Institutional Arrangements

As mentioned in section 7.2.2 above, the SEP will be managed by a Community Liaison Officer (CLO). Table 8 provides the institutional roles and responsibilities of implementing the SEP.

Table 9: Roles and Responsibilities

Responsible Party	Roles and Responsibilities
Project Management	– Oversee the overall implementation of SEP, including frequent interfacing with CLOs. – Ensure resources required (budgetary, human, and logistical resources) are available for the implementation of the SEP – Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.
E&S manager	– Regularly update the SEP and Grievance Mechanism – Implement and monitor stakeholder information exchange and participation strategies. – Reporting to project management – Government and lenders liaison
Community Liaison Officer (CLO)	– Participate in the update the SEP as required during the project's lifetime, to include planning, construction, operation, and decommissioning. – Overall responsibility for implementing the requirements of the SEP plan – Interaction with the community – Reporting to E&S management – Coordinate with the EPC Contractor's team
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.

10.4 Stakeholder Engagement Budget

Effective implementation of this SEP requires adequate financial, human and logistical resources throughout the Project lifecycle. Resources will be allocated to support stakeholder consultations, information disclosure, grievance management, communication materials, monitoring and reporting, and other stakeholder engagement activities across the Minya, Naga Hammadi and Abu Qir project components.

The indicative budget presented below has been developed based on the current Project scope and anticipated stakeholder engagement requirements. The budget figures are preliminary and intended to provide an indication of the resources required for SEP

¹⁴ Different lenders may require higher reporting frequency (monthly or quarterly). The project will report in shorter intervals (monthly or quarterly) according to different lenders requirements

implementation. Actual expenditures may vary depending on Project implementation schedules, stakeholder engagement needs, and any additional requirements identified during Project execution. The budget will be reviewed periodically and updated, as necessary, throughout the Project lifecycle.

Table 10: SEP Budget

SEP activity	Indicative budget basis	Estimated annual budget
Project CLO / social engagement resources	Project E&S staffing; one full-time CLO based in Minya covering all Energy Valley sites, with part-time/local liaison support for Naga Hammadi to be confirmed before construction and additional site-based support to be mobilized if required	Included in Project E&S staffing budget
SEP update and management	Periodic SEP updates, stakeholder register, action tracking	EGP 50,000
Arabic disclosure materials	Posters, grievance forms, infographics, etc.	EGP 25,000
Stakeholder meetings and disclosure sessions	Venue, logistics, refreshments, documentation, etc.	EGP 60,000
Targeted vulnerable group engagement	Small group meetings, women-focused engagement, accessibility support	EGP 60,000
GRM implementation	Grievance boxes, hotline/phone costs, forms, database, awareness materials	EGP 15,000
CLO travel and site engagement logistics	Travel between Minya, Naga Hammadi and Abu Qir, local transport and field visits	EGP 50,000
Monitoring and reporting	SEP monitoring, grievance reporting, stakeholder feedback tracking	EGP 40,000
Total indicative annual SEP activity budget	Excluding internal staff salaries already covered by Project staffing	EGP 300,000

Annex (1): Stakeholders MoM

1- Minya Engagement Activities

Topic	Discussions
6/1/2026: EEAA	
EEAA- Central EIA department	A meeting took place with the head of energy projects at the central EIA department of EEAA during which the categorization of the PV project and its different related projects including the PV and BESS in NREA East Menya concession, the consumer substation in Menya, the standalone BESS projects in Abou Qir and Nagaa Hammadi was discussed. It has been advised that the projects are to be categorised as Scoped B, that do not require organizing public disclosure meetings. As per the national environmental law, EEAA is to issue its opinion on the ESIA within 30 days from receipt of the ESIA for review.
15/2/2026: Informal agricultural operators at the Energy Valley site	
Farms operators at the site	During the site visit, a number of agricultural farms operators met while dismantling their infrastructure to evacuate the lands. Discussions indicated that they have been informally using land since 2023, despite it having been allocated for NREA since 2016. The agriculture operators indicated that since January 2025, the Menya governorate has been notifying and warning farmers to evacuate the lands, while some farmers claimed that no warnings took place by the governorate before undertaking the evacuation campaigns. As indicated by the interviewed farmers, the majority of farmers came from other governorates mostly from Gharbeia governorate. The farmers advised that they had submitted applications to the governorate regarding acquiring the lands area for agricultural activities. As they received no feedback to their applications, they assumed that the applications were accepted and moved forward with their projects. They have also applied to the Egyptian Electricity Transmission company and got connected to the electricity grid and they pay monthly electricity bills. This provided support to their assumption.
16/2/2026: General Agency of the Public Property Protection	
Head of the General Agency of the Public Property Protection – Menya governorate	Dr. Mohamed Shoeib, the Head of the General Agency of the Public Property Protection who advised that agency undertakes regular evacuation campaigns to acquire back public lands from illegal transgression. The evacuation campaign for the NREA concession took place as part of the 28th campaign undertaken within the Menya governorate. As indicated by Dr. Shoeib, in light of the amendments of Law 144/2017 with Law 168/2025, for some cases where the land transgression does not conflict with other planned uses of the area, legal reconciliation can take place. Since this is not the case for the NREA concession, no reconciliation or compensation has been considered
16/3/2026 Menya City Councils	

Topic	Discussions	
Attendees – Deputy Head of Menya City Council – Head of environmental department –Menya city	• Issues discussed included the following: – The project’s water demand and the capacities of existing water treatment companies within Menya and Abo Qurkas cities. The head of Menya city council indicated that the project needs to apply to the Menya water company indicating the required water demand. He advised that the water company will be able to secure the required water demand. – The Menya city waste management capacity: The head of Menya council environmental department advised that a solid waste landfill is currently under development at Toukh El Kheil area. Another waste dumpsites exist in Balansoura in Abo Qurkas and Mallawi. – The workforce required: It was advised that job advertisements, labour qualifications of and receipt of workers applications can be done through the Menya governorate labour office. – Workers accommodation: it was advised that accommodation within the closest villages is not a preferred option mainly because housing in the villages are mostly family homes and do not offer renting for foreigners from outside the village. In this respect, accommodation would be recommended to take place within Menya of Abo Qurkas urban areas where renting is available – The wastewater of the town of Meny is treated in the Talla Wastewater treatment plant which has a capacity of 53,600 m3/day and could accommodate the wastewater generated by the project in its peak construction period. .	
Chairman of Menya Water and Wastewater company	– The total water design capacities of the water treatment plants in Menya and Abo Qurkas are 313,240 and 106,320 m3/day respectively. – The Markaz of Menya has a total of 15 water treatment plants. Their capabilities vary from 2000 to over 100,000 m3/.day of which only 5 have capacities of more than 20,000 m3/day – On the other hand, Markaz Abo Qukas has only 2 treatment plants of capacities of 4,320 and 102,000 m3 /day. – Discussions focused on the ability of the nearest water treatment plants to meet the project water demand. Eng. Yehia advised that the daily water needs, about 500m3/day, cannot be met through one of the nearby water treatment plants. – In this respect, the project needs to coordinate with the water company in advance to enable planning the supply from different water treatment plants within the governorate. – There are two options to acquire water, namely this could be through direct contract with the water company for water supply. In this case, water could be provided from the plants in which capacity permits, and the water company would use its own trucks. Alternatively, the project could contract a private company using its own trucks to acquire water from points specified by the water company.	

Topic	Discussions	
– Head of EEAA Menya RBO – Head of environmental department- Menya governorate	Discussions included the following topics: – The categorisation of the project where it was indicated that project is categorised as Scoped B project according to the national EIA system. – Accommodation of workers: Eng. Eftat advised that accommodation can be provided within Menya urban centres. In addition, considering workers camps on site, similar to the practice of the agricultural projects in the area, will reduce the costs of extensive transportation given the significant distances between the site and the Menya city centres. – Transportation: it was indicated that the new Sammalout and Mallawi axes can be used for transportation of imported PV modules and BESS components whether from Sokhna or Safaga ports. – Labour: It was advised that unskilled labour are available in Menya governorate, while highly skilled technical and specialised labour will need to be sought from outside the governorate.	
NGOs	A meeting took place with various NGOs working in different community support areas. Discussions included the following issues: – Labour: the project may attract skilled construction workers in the governorate, thus potentially adversely affecting other construction activities. However, it was clarified that the temporary nature of construction activities is not expected to have significant impact on the other construction activities – Capacity building: an issue was raised regarding the potential provision of capacity building to the technical school students to qualify them to work for the project. It was clarified that due to the relatively limited project construction time frame, provision of capacity building can be provided within the scope of the project CSR plans. – Workers code of conduct is emphasized where accommodation of workers would take place within urban communities to control for potential frictions with the community including GBV. – Role of NGOs: attendees indicated that NGOs may play a role in providing awareness to the communities with regard to the project and information about the skills needed by the project. They can also play a role with regards to potential areas of community supporting the project 's CSR plans. Moreover, NGOs can support the project through monitoring many issues including e.g. workers' conduct or impact on rental costs Agreement with the project on issues to monitor could be discussed in due time NGOs can also contribute to training personnel on general skills such as first aid. Employment of physically or mentally disabled individuals: Although a 5 % share of employment is required by law, this is not expected to apply to individual projects especially in the construction phase but rather on the total employment of the contractors. During operation, more permanent jobs could be available depending on the specific conditions of individuals.	

Topic	Discussions
17/3/206- New Menya Urban Authority	
Deputy Head of New Menya Urban Authority	Discussions included the following topics: – Water treatment capacity: it was indicated that the design capacity of new Menya city is about 95,000m³/day to be operated in two phases of 45,000 and 50,000 m³/day. The current production of the first phase is 36,000m³/day – It was advised the construction activities within the new Menya city are still on going and have not yet reached its maximum capacity. Accordingly, the current excess capacity makes it easy to supply the water needs of the project. Wastewater treatment capacity is also available – It was also indicated that large number of the existing buildings are not yet occupied, thus providing sufficient workers accommodation. However, it was recommended to avoid concentrating large number of workers (especially unskilled workers), in one neighbourhood to avoid potential disturbances to the communities. – Potential adverse impacts of the project may include increasing the cost of construction labour. However, due to the temporary nature of the construction activities, such impacts would not be significant. – Waste management: there are two waste dumpsites for solid and construction wastes. – Regarding medical services, there is only one specialized hospital, Cardiothoracic Hospital, within new Menya city. Plans for construction of a Central Hospital are underway expected to be established in 2027. In addition, a number of small health units exist that can provide first aid services.
17/5/2026 General Secretary of Minya Governorate (2:00- 4:00 PM)	
A meeting took place with the General Secretary of Minya Governorate during which the following topics were discussed: – Project Components and Orientation: A comprehensive orientation was provided regarding the project components, technical capacities, and project locations across the governorate, including the main PV facility, BESS installations, and associated substations. – Hiring Procedures and Workforce Engagement: The recruitment mechanisms and project employment procedures were discussed, with specific reference to the intervention and support of the Youth Employment Administration in sourcing and facilitating local workforce engagement. – Grievance Redressal Mechanism: The project's grievance mechanism and complaint resolution procedures were presented, establishing a framework for addressing community concerns and worker-related issues throughout the project lifecycle. Social Engagement and Community Relations: A strategy for meaningful community engagement and stakeholder dialogue was outlined to ensure sustained local support and effective project integration within the governorate.	

Topic	Discussions
17/5/2026 Meeting with Minya Governor (4:00 -5:30 PM) A second meeting took place with the Minya Governor during which the following topics were discussed: – The Governor expressed a strong positive intention to cooperate and facilitate the resolution of any challenges that may face the project implementation. – The Governor expressed his satisfaction regarding the significant economic value of the project and its positive future impacts on investment opportunities within Minya Governorate. The project is anticipated to stimulate economic growth, attract further investment, and enhance the governorate's position as a renewable energy hub. Regarding employment procedures, the Governor affirmed that the Governorate would provide all required support through the Youth Employment Administration to announce job vacancies and facilitate workforce recruitment.	
8/6/2026 Head of Samalout City A meeting took place between the CLO and the Head of Samalout City, the following topics were discussed: – A comprehensive orientation was provided regarding the project location within Samalout City, with the accurate coordinates of the consumer substation from Sryriya village. – Key project stakeholders were identified and formally assigned to ensure coordinated engagement throughout the project lifecycle. The following stakeholders were designated for active participation and dialogue: • Local Unit of Beni Khaled Village (The mother village) • Syriya Community Leaders A structured communication framework was established to ensure regular and transparent dialogue between the project team and these stakeholder groups. – The project's hiring procedures were presented to the Head of Samalout City with specific emphasis on local workforce engagement. It was emphasized that project contractors have been instructed to give high priority to residents of neighboring villages during recruitment and employment processes, ensuring that local communities directly benefit from employment opportunities created by the project. – The project's grievance mechanism and complaint resolution procedures were discussed in detail. The Head of Samalout City was provided with the contact information of the project Community Liaison Officer (CLO), including phone number and email address, to facilitate direct community access to grievance redressal and project support services. This ensures that concerns and complaints from community members can be promptly addressed and resolved.	

2- Alexandria (Abu Qir) Engagement Activities

9/6/2026 Alexandria Vice Governor Assistant (Coordination Call)	
A coordination call took place with the Alexandria Vice Governor Assistant to present the project strategy in hiring procedures and grievance redressal mechanisms. The following topics were discussed: – The project's comprehensive hiring procedures and employment strategy were presented, emphasizing the commitment to prioritize local workforce engagement and ensure transparent, inclusive recruitment processes. The project's approach to maximizing employment opportunities for residents of neighboring communities was highlighted. – The project's grievance mechanism and complaint resolution framework were presented in detail, establishing a clear pathway for addressing community concerns and worker-related issues throughout the project lifecycle. – The Vice Governor Assistant demonstrated high potential for cooperation and support. During the call, he requested that the project team prepare a comprehensive proposal containing project recommendations for stakeholder engagement strategies to be formally presented to the Governor for review and endorsement. The Vice Governor Assistant promised to arrange and facilitate a physical meeting with the full project team to further discuss, review, and confirm both the hiring procedures and the grievance mechanism, ensuring full alignment and gubernatorial support for project implementation.	
24/5/2026 Meeting with Abu Qir Power Plant	
A meeting was held with representative from the adjacent Abu Qir Power Plant. The following topics were discussed: – Possible assistance that could be provided by the AQ power plant, as they the owner of the land and leased the land to Energy Valley project through usufruct agreement through the West Delta Electricity company. – From the knowledge of the project area, AQ Power Plant representative identified several neighboring stakeholders that are currently engaged, including: - o AQ Petroleum - o AQ Gas (Gasco) - o Petrojet - o Other neighboring families and entities	

3- Qena (Naga Hammadi) Engagement Activities

17-18/6/2026 Consultations with Naga Hammadi Stakeholders	
Discussions and consultations have been conducted with a wide range of stakeholders, including community representatives, local mayors, government officials, representatives of the industrial zone, and heads of local families, regarding Scatec's new project, "Energy Valley." Overall, stakeholders expressed a positive perception of Scatec and welcomed the company's continued presence and investment in the region. However, due to the limited scope of activities currently planned for the project in Naga Hammadi, stakeholder interest remains relatively low at this stage. Most participants indicated that the project is not expected to have a significant direct impact on the local community in terms of economic opportunities, local procurement, or community development initiatives. During the discussions, employment opportunities emerged as the primary area of interest and concern among stakeholders. Several representatives emphasized that the local community's engagement with the project would likely increase if job opportunities become available during future phases of implementation. Stakeholders also expressed expectations that any recruitment process should provide fair and transparent access to qualified candidates from the surrounding communities, in line with the company's commitment to local participation. At present, no major concerns, objections, or project-related grievances have been raised by stakeholders. Nevertheless, it is recommended to maintain periodic engagement and information-sharing activities to ensure that stakeholders remain informed about project developments and to manage expectations regarding the project's scope, timeline, and potential employment opportunities.	

Annex (2): Grievance Register

Annex (3): Grievance Form

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