

Scatec

**Stakeholder Engagement Plan
For Project Dandara PV and BESS – Nagaa
Hammadi**

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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 preliminary 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 project consists of a 500 MWac solar power generation project, including a 100 MWh Battery Energy Storage System (BESS) (first phase), in the Nagaa Hammadi area. This project aims to deliver the generated power to the national grid. The project will be connected to the national grid through an overhead transmission line (OHTL) to be constructed by Dandara Solar Power, linking the project substation to the existing Nagaa Hamadi Industry Park Substation. The generated electricity will then be wheeled to EgyptAlum through the existing electricity grid infrastructure.

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
 - Glint

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 will be continuously reviewed and updated throughout the project lifetime.

Stakeholder Identification

Stakeholders 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, as follows:

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

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)

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

The mechanism will be developed to ensure the processing of complaints related to the construction site and complaints from local resident. It will consider Stakeholder Grievance Mechanism for 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. KPI 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

The CLO will be a central point of contact in Nagaa Hammadi and undertake the engagement activities. The CLOs will also be responsible for ensuring that the Community Feedback Procedure is active and effective and will closely coordinate with the developer's E&S and HR teams. The CLO(s) is responsible for day-to-day management and face-to-face community engagement.

1. Introduction

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

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

To meet requirements of international 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

² Specifically, World Bank Environmental and Social Standard 10 (Information Disclosure and Stakeholder Engagement) and IFC Performance Standard 1 (Assessment and Management of Environmental and Social Risks and Impacts)

process and outputs and, the contributions of stakeholders to the ESIA preparation.

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

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

2. Project Description

Scatec plans to develop a 500 MWac solar photovoltaic power plant 'Dandara Solar Power SAE' combined with a 100 MWh Battery Energy Storage System (BESS) (Phase 1) in Qena Governorate, east of the Nagaa Hammadi Industrial Zone.

The project will supply renewable electricity to the Egypt Aluminium Company (EgyptAlum) under a long-term Power Purchase Agreement (PPA). Its primary objective is to support the decarbonization of aluminium production, ensure compliance with the European Union's forthcoming Carbon Border Adjustment Mechanism (CBAM), and reduce reliance on natural gas, while contributing to Egypt's renewable energy and climate targets.

Figure 1 below shows the activities/land uses surrounding the proposed site.

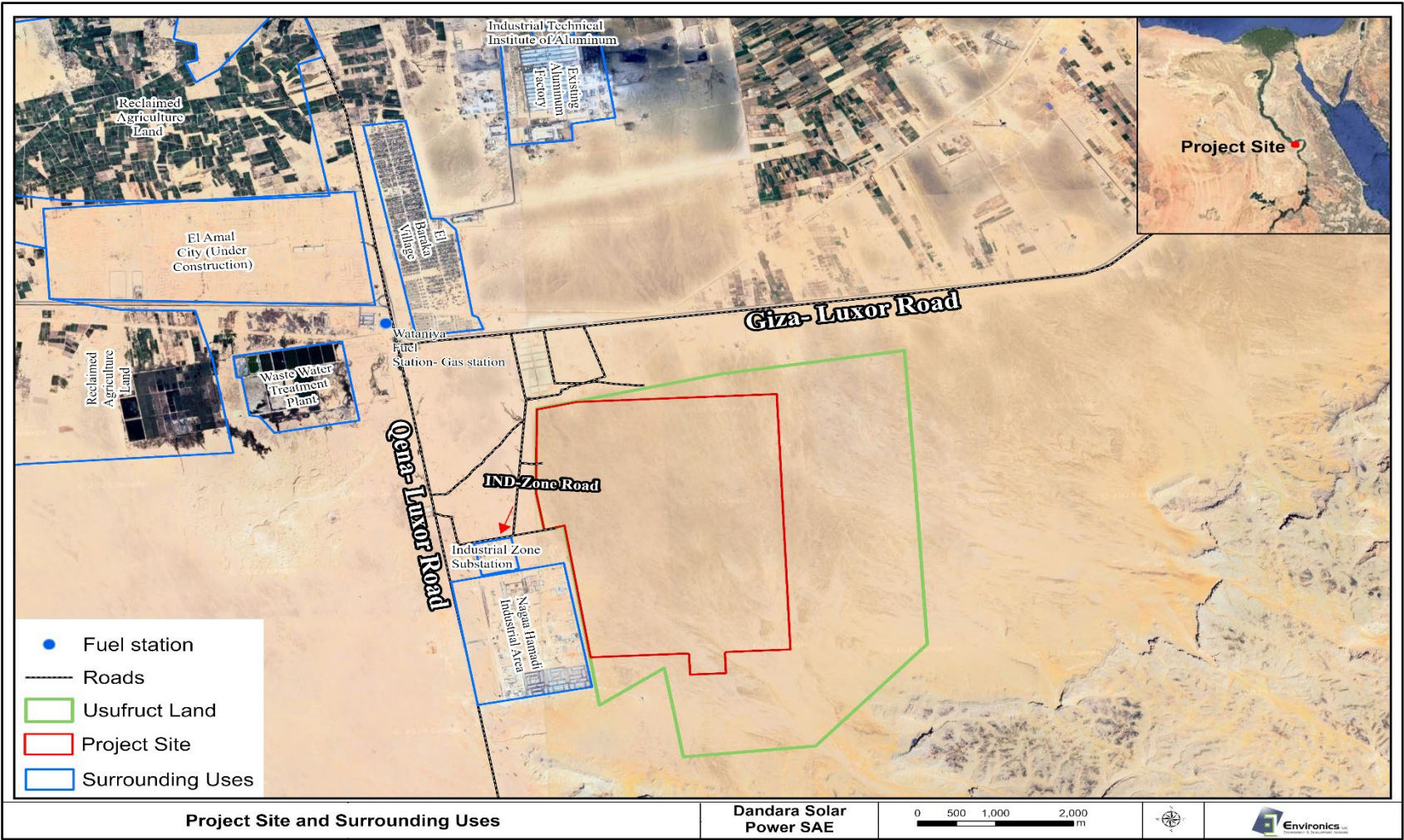


Figure 1: Location and surrounding activities of the project site

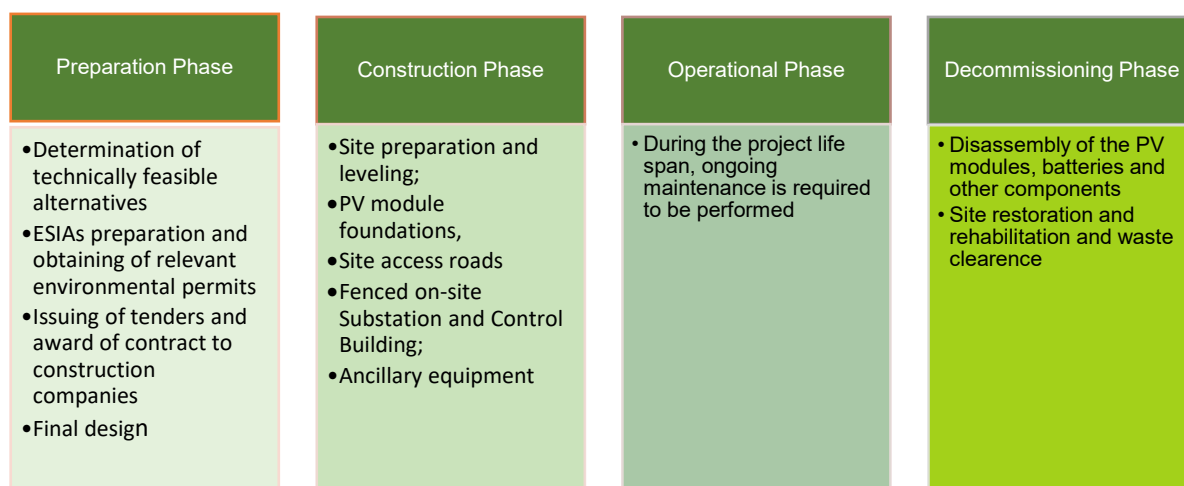


Figure 2: General Stages of PV Project Construction

3. Overview of Potential Environmental and Social Impacts

Potential environmental and social impacts of the construction and operation of PV power plants are shown in Table 1

Table 1: 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	Impacts from levelling, excavation and backfilling activities from construction vehicles machinery as well as use of transportation vehicles to transport the PV panels and other components equipment and construction materials.
Noise and vibrations	Workers	Potential impacts during construction. Noise and vibration during construction might be a source of annoyance to the neighboring industrial area. <u>It is noted that there are no residential communities near the project site.</u> The closest communities is the industrial area east of the site.
Water Resource Requirements	Water resources, trucking from nearest water plants)	Water requirements for the construction phase is about 97 m ³ / day for sanitary municipal water, and about 76 m ³ / day for construction water during peak construction. Water requirements could be met by the existing water treatment capacity from the nearest water plants.
Wastewater Generation	Soil and groundwater	Sanitary water from workers, gray water from accommodations and kitchens, Improper management may cause impact on soil However, the depth of the groundwater would make it highly unlikely to be impacted.
Solid waste generation	Workplace, workers and soil	Improper handling and management may have an impact on workplaces and workers as well as potential soil contamination as result of spills and leaks, and also could attract stray animals
Hazardous waste generation	Workplace, workers and soil	Improper handling and management may have impact on workplace and workers as well as potential soil

E&S Aspect	Potential Receptors	Potential impact
		contamination as result of spills and leaks.
Increased Transportation Demand	Communities along the transport route	Transport of PV components from port(s), will be considerable, which can affect the roads, the road users and communities along the transport routes in addition to potential accidents.
Workers Influx	Workers, nearest communities	A number of workers may put pressure the resources of the nearest communities. In addition inadequate temporary accommodation may have impacts on the workers' welfare.
Operation Phase		
Dust/Particulate Matter/Gaseous Emissions	Occupational work environment	Very limited emissions potentially resulting from on-site movements for maintenance activities
Water Resource Requirements	Water resources trucking from nearest water plants)	Expected to be limited for domestic purposes due to small number of operation workers.
Wastewater Generation	Soil and groundwater	Although of limited quantities due to small number of operation workers, yet if improperly managed may have potential impact on soil but unlikely ground water, due to its depth and the limited generated volume.
Solid waste generation	Workplace, workers and soil	Although of limited quantities due to small number of operation workers, if improperly managed, wastes may have potential impact on soil and as well as potentially attract stray animals.
Hazardous waste generation	Workplace, workers and soil	Although of limited quantities (except of Li-batteries at their end of life) resulting from maintenance activities, yet if improperly manages may have potential impact on soil
Glare	Changes in landscape appearance	No visual impacts are expected on the neighboring environment since there are no sensitive residential communities within the vicinity

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.

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

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

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

iii) Continuous Engagement

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

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:

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>

- **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.

5. Social Context of the Project Area

Key social aspects are summarised as follows:

- **Population:** the proposed project site is located within the desert hinterland of the city and Markaz Nagaa Hammadi - Qena governorate. There are no human settlements or local communities within or near the Project Site, the nearest settlements are located at about 5.6km north of the project site. The Hiw light industries zone is located at 0.5km east of the site. The site is located around 15 km southeast of the town of Nagaa Hammadi. There are no other nearby cities or settlements near the project site. In Markaz Nagaa Hammadi, the total population is about 578,237, with males accounting for 51.07% (295,357) and females 48.92% (282,880). The nearest community to the proposed project site is Hiw village with a population of about 200,000 inhabitants.(CAPMAS 2017)⁷
- **Labour Education:** Significant number of the population of Qena governorate are seen in the Technical Intermediate education level. University education also has significant numbers. In Markaz Nagaa Hammadi the Technical Intermediate category again shows the high numbers followed by University education.
- **Employment:** In Qena, the total workers across all occupations are 927,108. In Markaz Nagaa Hammadi, the total workers across all occupations is 182,451. In both Qena and Nagaa Hammadi, males predominantly occupy roles in elementary occupations⁸, plant and machine operations, and skilled occupations while females are more concentrated in service and sales, as well as clerical support roles.
- **Health facilities:** Qena governorate has a highly accessible network of

⁷ Latest official census published in Egypt

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

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 at a distance of approximately 12km and 10km respectively, as well as one hospital (Aluminum hospital) north of the proposed project site.

- **Infrastructure:** The Giza - Luxor Road passes approximately 3 km north of the project site, this road connects Qena and Nagaa Hammadi cities to the project site, this road consists of two separate lanes, each of approximately 10 meters wide.
- **Drinking water:** 99.58% of the governorate urban areas population is connected to the public network, while the remaining 0.42% uses groundwater wells. In rural areas about 95.92% of the population is connected to the public network, and the remaining 4.08% use groundwater wells. Within the governorate plans, expansions are underway to increase the capacity of the water treatment plants at Nagaa Hammadi.
- **Sewage:** About 15.47% of Qena governorate population is connected to public networks, while 2.01% of households use private networks. A significant 82.14% rely on cesspits, 0.35% use open field and other methods. In urban regions, about 63.97% are connected to public networks with, and 1.5% use private networks. Since the census of 2017, the government program “Hayah Karima” has invested in multiple wastewater projects in Qena Governorate and it is, therefore, expected that the percentage of household connected to the public network has currently substantially increased.
- **Cultural heritage:** There are no registered antiquities or cultural heritage sites in the vicinity of the project site based on the Egyptian Archeological Map (2022) and the UNESCO World Heritage List of Egypt.

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. Stakeholder groups can broadly be divided into stakeholders who:

- May be directly and/or indirectly affected by the project.

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

- 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.

6.3 Stakeholders' Analysis

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

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

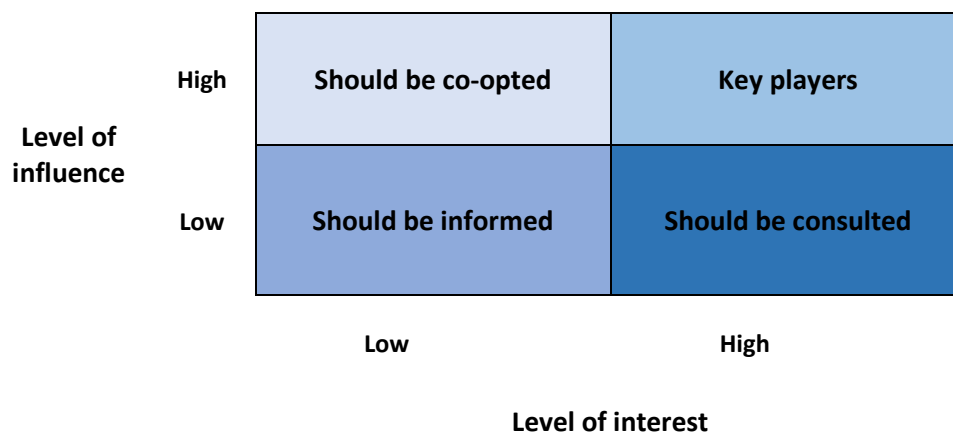


Figure 3: Stakeholders' categorization

Stakeholders have been identified considering the following factors:

- Project's nature and activities;
- Geographical extension and location of the project; and
- Environmental and Social aspects and potential impacts of the project

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

Table 2: Stakeholders Groups

Stakeholder Category	Stakeholders	Impact, Influence and Interests
Primary Stakeholders		
Local Businesses & Industry	Small business owners in the nearest cities and towns	Economic interest in the project (providers of goods and services).
	Neighbouring Nagaa Hammadi Light Industries area	Potentially affected by the project construction activities
Interested organizations	NGOs ¹⁰	National and local, which can provide social context and effective contacts to concerned communities
Local Communities/ residents	Nearest communities to the project site ¹¹	Provision of workforce, may include key leadership figures of community stakeholders
Workers	Employees of the developer and the contractors	Exposure to occupational health and safety risks Economic benefits
Vulnerable groups (specific vulnerable groups will be identified as the Project development proceeds)	women groups, disabled groups, elderly groups, etc..	Such groups have a vested interest in the project due to mainly potential for job opportunities. In addition, such groups could be impacted by other potential negative impacts (e.g., worker influx, Gender Based Violence and Harassment (GBVH), etc.)
Secondary Stakeholders		
National Regulators/ agencies & Permitting Authorities	NREA EEAA EIA,	Includes authorities and agencies responsible for project permitting approvals.
Other relevant agencies	Egyptian Electricity Transmission Company Ministry of Transport (roads and bridges Authority) Water and Wastewater company	Mostly related to utilities infrastructure such as the OHTL, water and wastewater services
Local Government	Qena Governorates and Nagaa Hammdai city.	The Governorate is of political importance and are home to the primary stakeholder and

¹⁰ On the local level the following CDAs have been identified Elderb NGO, Baraka Village Charity Organization and "Moaasaset Al Nedaa El Khaireya, Enfaa Baladak Charity NGO have been identified so far and on the national level Nature Conservation Egypt, the local representative of BirdLife International. The updating, mainly expansion, of these lists on both levels will be a continuous activity throughout the project lifetime .

¹¹ Include El Baraka village, Nagaa Mubarak village and agriculture reclamation activities

Stakeholder Category	Stakeholders	Impact, Influence and Interests
		therefore could have a role in maximizing benefits and/or controlling adverse impacts. They also have a key role in issuing project construction permits as well as supplying utility services and security. In addition, support in facilitating advertisement of job opportunities and receiving applications from the communities
Healthcare Providers and emergency services	Main hospitals and healthcare units	Would need to cater to the large workforce attracted by the project
Media	National and local mass media and newspapers	Channel to disseminate information; key public opinion influencers.

Preliminary stakeholder mapping and categorization is presented in **Table 3.** , and will continue throughout the project life. The table also proposes the engagement method deemed most effective for each stakeholder group, as follows:

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

Table 3: Stakeholder Engagement Approach

Stakeholder Category			Approach	Engagement Method
Local Businesses & Industry			To be consulted	Focus group discussions
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 informed	Focus group discussions

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 Consultation during the Scoping and ESIA stages

Initial stakeholder consultation activities were initiated at the scoping and ESIA stage. Following Table (3) presents a brief summary of the stakeholders consultation activities to date. Annex 1 presents the detailed stakeholders meetings.

Table 4: Summary of the stakeholders consultation activities to date

Stakeholders	Issues discussed
27th July 2025	
Qena Governorate Meeting	<ul style="list-style-type: none"> – The meeting primarily focused on the land allocation issue and the possible options for selection. One of the key selection criteria discussed was the availability of land suitable for the solar project while ensuring the avoidance of any potential land ownership disputes. – The meeting also addressed flood hazards at the proposed locations and the corresponding flood protection requirements
6th October 2025	
EEAA- Central EIA department	<ul style="list-style-type: none"> – A phone call took place with the head of energy projects at the central EIA department of EEAA. The discussions primarily focused on the categorization of the PV project where it has been advised that the project is to be categorised as Scoped B, which does 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.
27th October 2025	
Qena City Council Local Office	<ul style="list-style-type: none"> – The duration of project construction phase is expected to be maximum 18 months. This stage is the most labour intensive where the number of labour is expected to range within an average of 5000 workers during peak construction. During operation the expected number of labour would be about 100 personnel – The labour qualifications required for construction works will include low and semi-skilled labour as well as highly skilled technical qualifications. All contractors are encouraged to continuously increase the percentage of local content. – for the installation of the PV panels in addition to project management engineers. During operation, the labour required include highly qualified and experience technical personnel for operating and maintaining the operation of the PV and the substation. – The sources of labour will be primarily from the local communities from the surrounding villages as well as from Nagaa Hammadi city and Qena governorate. It was emphasized that in cases of lack qualifications within the local communities and/or the Qena governorate, such qualifications will be sought from around Egypt. – Job opportunities announcements will be through Qena governorate. – In case there are grievances related to the hiring process that are submitted to the governorate or the company, Scatec investigates each case and notifies the governorates about the grievance investigation results. – It was indicated that as result of concentration of workers accommodation within the village significant increase of rental prices which decreased the availability of apartments to the local communities. Accordingly, Sactec instructed all contracts to withdraw their workers from the El Baraka housing and provide alternative housing in the surrounding urban centers in addition to the onsite workers camps. – No workers accommodation with take place at El Baraka village for the proposed Dandara project. In addition, with maximizing the number of workers form the local communities, the need for accommodation of workers will considerably decrease. – The potential impact on nearby community resources, such as food, water, etc., as result of workers influx, was reported to be insignificant since the labour needs are sought for allover the governorate. – Moreover, as result of the project, the project will result in saving energy that would have been consumed by the EgyptAlum from the electricity grid and make it available for other development purposes
	<ul style="list-style-type: none"> – The water needs of the current Obelisk project are sought from Nagaa Hammadi water plant that has the capacity to meet the demand of the new Dandara project especially that there will not be significant overlap between the two project activities. – The project's wastewater is managed through the existing wastewater treatment plant northwest the project site. Reportedly, a new wastewater treatment plant is currently under construction to meet the expansion needs of Nagaa Hammadi industrial area.

Stakeholders	Issues discussed
Nagaa Hammadi Industrial area	<ul style="list-style-type: none"> – The land area required for the Dandar PV project could not be accommodated within the limited land areas available within EgyptAlum premises. Moreover, the area within EgyptAlum is subject to various air emissions form the Aluminium production which may deposit on the surface of the PV panels and affects its production efficiency. In addition, allocation for renewable energy projects is managed and granted through the New and Renewable Energy Authority (NREA). – Regarding wage gaps, it was also advised that this issue may be result due to the fact that the PV projects are committed to comply with the national minimum wage rates that are higher than those currently offered by the manufacturing facilities. – It was advised that the industries can participate in the bidding requirements issued for food and material supply. A list of available industries and their specializations and products will be compiled and provided to Scatec to enable identifying areas of potential cooperation in the future. – Based on the experience with the current Obelisk project the noise from ramming did not reach the industrial area and no impacts have been identified. However, dust was identified as occasional issues mainly during windy conditions. With the continued implementation of existing dust suppression measures—such as soil damping—dust impacts are expected to be minimized. The same mitigation measures would be implemented for the proposed Dandara project.
28th October 2025	
El Baraka Healthcare unit	<ul style="list-style-type: none"> – The project team emphasized the importance of hiring from local communities near the project area. – The project team advised that the issue has been addressed through maximizing the local employment enhancing the on-site accommodation in workers camps. Contractors has also been instructed to minimize the accommodation in El Baraka and provide alternative the accommodation within larger urban areas. – The strain on local resources as result of workers influx was raised. It was advised by the attendees that no shortage in resources, food, water, or other services and utilities has been experienced as result of workers influx. – Regarding the community benefits and potential community support, the project team indicated that the proposed project together with the existing one, will help strengthen the electricity grid, thereby indirectly benefiting grid users by making additional power available and minimize the national regular power cuts that has been witnessed in Egypt over the last years. – In addition, Scatec through its corporate social responsibility plans (CSR) has provided support to various families through projects that would ensure sustainable income.
Enfa'a Baladak "Support your community" Charity NGO	<ul style="list-style-type: none"> – The project team clarified that the duration of project construction phase is expected to be maximum 18 months. This stage is the most labour intensive where the number of labour is expected to range within an average of 5000 workers during peak construction. During operation the expected number of labour would be about 100 personnel – The hiring policy and procedures were explained, and the attendees were encouraged to follow the jobs advertisements and apply through the governorate. – The project team also stressed that women are encouraged apply for jobs depending on their qualifications. – Regarding community support, the project team clarified that Scatec through its corporate social responsibility plans (CSR) has provided support to various families through projects that would ensure sustainable income –
Local communities: Nagaa Mubarak Village next to El Baraka Village - Hiw	<ul style="list-style-type: none"> – The project team reaffirmed Scatec's strong commitment to maximizing local employment and ensuring high local content during both construction and O&M phases. The employment is done typically through advertisement on the governorate website as well as social media. – The project team explained that the issue of increase housing rental was addressed through the following measures: <ul style="list-style-type: none"> ○ Conducting labor and accommodation influx assessments to quantify impacts, identify hotspots, and determine suitable alternative accommodation areas for workers. ○ Requiring contractors to avoid high-impact areas and seek housing options in lower-density zones.

Stakeholders	Issues discussed
	<ul style="list-style-type: none">○ Monitoring implementation of these measures, which reportedly helped stabilize and reduce rental prices– Regarding the community benefits and potential community support, the project team indicated that the proposed project together with the existing one, will help strengthen the electricity grid, thereby indirectly benefiting grid users by making additional power available and minimize the national regular power cuts. Through Scatec corporate social responsibility plans (CSR) support was provided to various families through projects that would ensure sustainable income.– Attendees advised that the ongoing Obelisk project has a positive impact on the local business in the area specifically in areas of food services areas. It was advised that the increased demand as result of the project did not put pressure on the availability of food or the food prices.

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 community liaison officer (CLO), preferably from the local community. The CLO will be responsible for necessary implementation of the SEP. The engagement activities will focus on:

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

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	The official Facebook page of Qena governorate and the Nagaa Hammadi city could be used as a primary source of information. Both Facebook groups have more than 5000 members. There are also communities Facebook that could be used.
Press Release via Company	The company project website, which contains key project information and updates. Updates on the project can be found at https://scatec.com/2025/03/13/scatec-signs-ppa-with-egypt-aluminium-for-major-solar-bess-project/
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.

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

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

The CLO 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	<ul style="list-style-type: none"> – 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	<ul style="list-style-type: none"> – 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) (Male and Female)	<ul style="list-style-type: none"> – 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 5, below presents the timing of engagement for the different stakeholders with respect to the project phases. In addition, Table 6 presents the stakeholder engagement action plan to include relevant stakeholders, the objectives of the consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations.

Table 6: Timing of engagement for the different stakeholders

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

Table 7: Stakeholders communication Action plan

Stakeholder	Potential issues/ concerns	Key messages	Communication mechanism	Frequency	Responsibility
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
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
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	<ul style="list-style-type: none"> – Induction trainings – Internal meetings /toolbox talks 	<ul style="list-style-type: none"> – Upon employment – Continuous during construction and operation 	Developer HSSE Team / EPC Team as applicable
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
Secondary Stakeholders					
Regional Government (Qena Governorate, Nagaa Hammadi city)	Licensing renewal, security, employment and business opportunities, community investment initiatives	Disclose information on project updates and development	One-on- one meetings, written formal correspondence	Bi-annually or as required	Developer team as relevant

Stakeholder	Potential issues/ concerns	Key messages	Communication mechanism	Frequency	Responsibility
NREA	Issuance of operation permits	Disclose information on project updates and development	One-on- one meetings, written formal correspondence	<ul style="list-style-type: none"> – During ESIA development – Issuance of operation permit and as required 	E&S manager and other Developer team as relevant
EEAA	ESIA approval , project follow up and ESMP inspection	Disclose information on project updates and development	One to one meetings, written formal correspondence,	<ul style="list-style-type: none"> – At the scoping and ESIA preparation – Biannually or as required 	Developer E&S manager
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
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
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
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

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”¹². 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 AfDB¹³ ISS Best Practice Note addressing SEAH and GBV and EBRD¹⁴ good practice Addressing Gender-Based Violence and Harassment.

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

¹² IFC PS 2012, para. 35 (Grievance Mechanism for Affected Communities)

¹³ https://www.afdb.org/sites/default/files/borrower_guidance_note_on_gender_in_es_safeguards.pdf

¹⁴ 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>

- 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.
- 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.

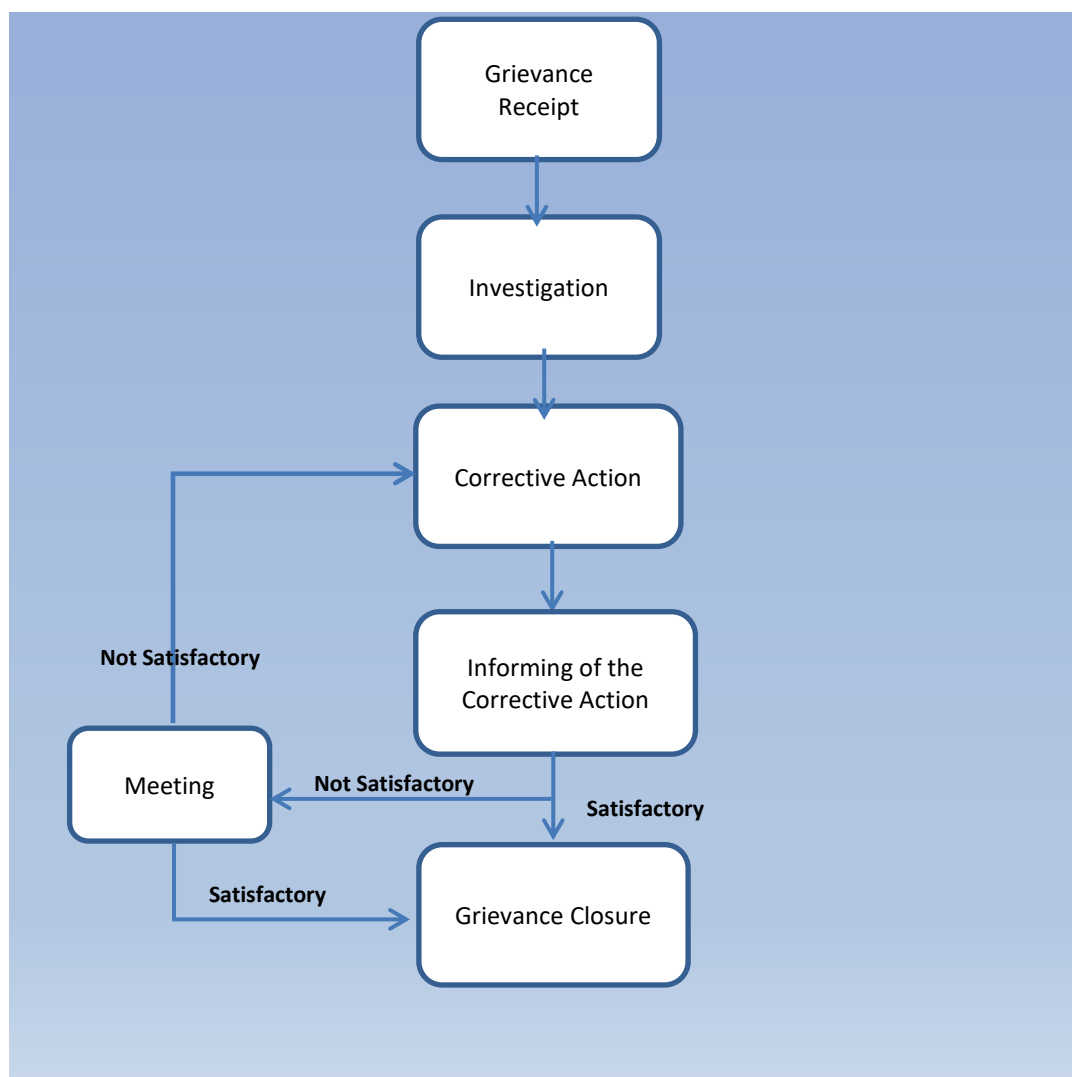


Figure 4: Proposed project's grievance mechanism system

- Grievances can be lodged in writing or verbally, as appropriate. The CLO will acknowledge receipt of the grievance and explain (in writing or verbally whichever is more appropriate) in brief the process of redress that will be followed.
- Grievances may also be lodged anonymously: a grievance box will be placed at different locations as well as construction site to allow community members, if any, and project staff to post written grievances. The telephone contact of the CLO will also be widely shared and published via the different communication channels described above.
- A Grievance form will be disclosed at key locations as well as on the company website. The Grievance form will inform the communities on how and where to submit a grievance. Annex (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. Monitoring and Reporting

9.1 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.

9.2 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 Report¹⁵ 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.

9.3 Institutional Arrangements

As mentioned in section 7.2.2 above, the SEP will be managed by a Community Liaison Officer (CLO). Table 7 provides the institutional roles and responsibilities of implementing the SEP.

Table 8: Roles and Responsibilities

Responsible Party	Roles and Responsibilities
Project Management	<ul style="list-style-type: none"> – 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	<ul style="list-style-type: none"> – 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) -(Male and Female	<ul style="list-style-type: none"> – 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

¹⁵ 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

	<ul style="list-style-type: none">– 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.

Annex (1): Stakeholders MoM

Annex (2): Grievance Register

Submission Date	Name of Complainant/ (could be Anonymous)	Brief Description of Grievance	Corrective Action implemented	Complainant's satisfaction (Y/N)	Meeting Results (In case corrective action is not satisfactory)	Closure Date

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?	