
Non-Technical Summary

ALEXANDRIA PETROLEUM COMPANY, EGYPT

November 2020

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1. Background

Introduction

The Alexandria Refinery is operated and owned by Alexandria Petroleum Company (APC), a 100% fully owned subsidiary of the Egyptian General Petroleum Corporation (EGPC), an economic state corporation affiliated to the Egyptian Ministry of Petroleum.

APC are proposing to upgrade their existing facility (the Project) and this Non-Technical Summary (NTS) provides a description of the planned upgrade and describes the potential benefits and impacts associated with their construction and operation. It also describes how these will be mitigated and managed through all phases of the project and provides a summary of the public consultation activities and the approach to future stakeholder engagement.

The Project includes the installation of a diesel hydrotreater to produce Euro V diesel as well as various resource and energy efficiency and pollution prevention investments.

The European Bank for Reconstruction and Development (EBRD) is providing finance to support elements of the Project.

Contact details at APC for this project are:

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Site Location

The Site is located inland in Alexandria Governorate, approximately 8 km west of the central business district (CBD) of the city of Alexandria, near the Mediterranean coast. The total area of the refinery is approximately 75 hectares (ha). The topography of the refinery and immediate surrounding area are largely flat.

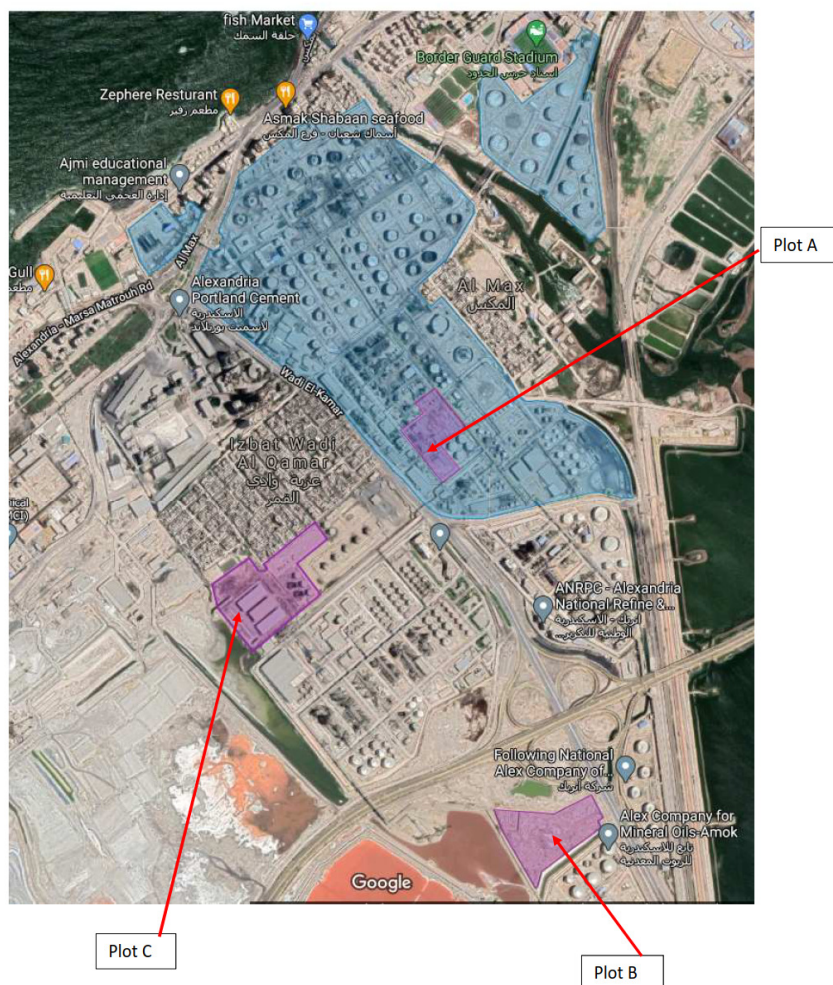
A map of Alexandria, Egypt, showing the location of the Alexandria Petroleum Company marked with a red pin. The map includes labels for various districts and landmarks in both Arabic and English. The company is located near the coast, south of the city center. Other labeled areas include El Agamy, Abu Talat, Sidi Kiray, Qaryat Siyahyah, Burj Al Arab, New Borg, El Andalus Village, Al Jazair, Al Qahr, Al Huwayhi, Kafr El Dawar, Abu Hummus, Kom Sawwan, Ezbet Elmogahdeen, Housh Elssa, Abu Al Molam, and Idku. The map also shows the Mediterranean Sea to the west and the city of Alexandria to the north.

Currently, three potential locations have been identified for the investment projects. Two of these are inside the APC boundary, and two are at nearby offsite locations, as shown in Figure 3.

The following current and proposed status for these three areas:

- Plot A – within the APC refinery boundary, and partly occupied by various buildings and structures. Proposed location for the new VRU, and other project components.
- Plot B – owned by APC / EGPC sister companies, and currently vacant and disused. Proposed location for the new hydrotreater. Pipework and other infrastructure will be needed to connect the facility to the refinery
- Plot C – owned by APC, and currently used for warehousing of equipment. No Project activities currently proposed at this stage.

Figure 3: Proposed Project Locations



The nearest residential buildings are located adjacent to the western, northern and eastern boundaries of the refinery site.

Overview of APC Operations

The refinery has a crude design capacity of 100,000 Barrel Per Stream Day (BPSD). It typically processes light Western Desert and heavy Kuwait crude oil. It currently has a refining capacity of 5 MMTY to supply the local market with its needs of LPG, naphtha, kerosene, diesel, fuel oil, base lubes, waxes and asphalt.

An overview of the APC operations is presented below.

Number of Sites / Companies	<p>APC is a subsidiary of the Egyptian General Petroleum Corporation (EGPC), an economic state corporation affiliated to the Egyptian Ministry of Petroleum.</p> <p>APC operates a single refinery site located approximately 8 km west of the city of Alexandria.</p>
Employees	Approximately 4,800 permanent staff
Products	<p>Products manufactured at the Site include the following.</p> <p>Main Products of Distillation and Solvent Units</p> <ul style="list-style-type: none"> ▪ Propane ▪ Liquefied petroleum gases (LPG) ▪ Light naphtha ▪ Heavy naphtha ▪ Kerosene ▪ Jet Fuel ▪ Hydrotreated kerosene ▪ White spirits ▪ Gas oil ▪ Special gas oil (marine, electrical, etc.) ▪ Hexane (food grade) ▪ Special hexane ▪ Petroleum ether 40/60 ▪ 60/80 solvent ▪ Mexsol 80/110 ▪ Some special solvents according to market demand <p>Main Products from Lube Oil Complex, Used Oil and Blown Asphalt Units</p> <ul style="list-style-type: none"> ▪ Vacuum gas oil ▪ Spindle oil ▪ light wax distillate ▪ Medium wax distillate ▪ Heavy wax distillate ▪ PD Tar ▪ Residue aromatic extract ▪ Brightstock lube base oil ▪ Hard wax ▪ Soft wax ▪ Neutral oils (light, medium, and heavy neutral oil) ▪ Oxidised bitumen 60/70 heavy duty for exportation ▪ Oxidised bitumen (grade 95/25) for exportation
Current Production Operations	<p>The major process units in the Alexandria Refinery include:</p> <ul style="list-style-type: none"> ▪ Atmospheric Distillation Units (x3) ▪ Vapour Recovery Unit ▪ Solvent Production Complex ▪ Lube Oil Complex ▪ Re-refining Used Oil Units ▪ Oxidised Bitumen Unit <p>Ancillary activities include:</p> <ul style="list-style-type: none"> ▪ Raw water treatment

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- Thermal power units
 - Waste water treatment plant
 - Tank farm and oil pipelines – there are approximately 170 bulk hydrocarbon tanks
 - Administration buildings
 - Workshops and fabrication shops
 - Medical clinic
 - Fire station
 - Canteens and welfare facilities
 - Jetty and associated pipelines
 - Security service
-

Overview of the Project

In the current mode of operation, the APC refinery has a low level of energy performance, a high level of flaring and CO₂ emissions and poor water performance. The proposed investment projects aim to improve the situation.

The proposed investment projects aim to improve overall efficiency of the facility, increase productivity and increase environmental performance by:

→ **Pollution & Emissions Reduction investments**, which includes:

- Continuous emissions monitoring system (CEMS)
- Wastewater treatment plant (WWTP)
- Vapour recovery unit (VRU)
- Sulphur Recovery Unit (SRU)
- Sour Water Stripper (SWS)
- Amine Regeneration Unit (ARU)
- Cooling water tower

→ **Resource / energy efficiency investments**, which includes:

- Combustion Air Preheaters
- Energy management system (EMS)
- Burner management system (BMS) for existing heaters
- Off gas compressor system
- HP boiler, turbine, deaerator, makeup water treatment

→ Installation of a new **Diesel Hydro-Treatment (DHT)**

→ Installation of **Pressure Swing Absorption (PSA)**

2. What are the environmental, health, safety and social aspects (EHSS) of the project?

What Environmental, Health, Safety and Social Assessment Has Been Conducted for the Project?

In August 2020, an Environmental and Social Due Diligence (ESDD) assessment and audit was undertaken at the APC facility in Alexandria on behalf of EBRD. This ESDD evaluated the environmental and social impacts and benefits of the project and evaluated them against the following criteria:

- European Bank for Reconstruction and Development (EBRD) 2014 Environmental and Social Policy, which includes a comprehensive set of Performance Requirements (PR) covering key areas of environmental and social impacts and issues.
- Applicable European Union (EU) Reference Guidelines for Best Available Techniques (BREF), covering Best Available Techniques (BAT) for management of environmental impacts for relevant industrial sectors.

Where the audit has identified the need for further mitigation measures to address impacts or improvements in corporate Environmental, Health and Safety and Social (EHSS) performance, an action has been proposed and incorporated into an Environmental and Social Action Plan (ESAP). This ESAP would enable compliance with relevant corporate, national, EU standards and EBRD Performance Requirements. The Project is being designed to fully meet these requirements. Where the due diligence has identified areas for improvement across the rest of the refinery, these are also included in the ESAP to bring the refinery as a whole closer to meeting EBRD's requirements in the shorter and medium term and achieving compliance in the long term

The EBRD has categorised the Project as B.

What is the Environmental Impact Assessment Process for the Project?

The main legal instrument dealing with environmental issues in Egypt is Law 4/1994, amended by Law 9/2009, Law 105/2015 and Executive Regulation 1095/2011 which is amended by ER 710/2012, ER 964/2015, ER 544/2016, ER 618/2017 and ER 1963/2017. According to Article 1 of Law 4, the entity responsible for a given project is required to carry out an assessment of the project's potential impact on the natural and socio-cultural environment before implementing that project. The findings of the assessment are submitted to the EEAA for review and approval before other relevant governmental authorities can issue their permits for implementing the project. Subject to each project classification (A, B, or C), EEAA developed specific procedures to be followed and studies to be made and presented for review and approval prior to any construction activities.

EEAA has developed detailed principles of the EIA system which include the following aspects:

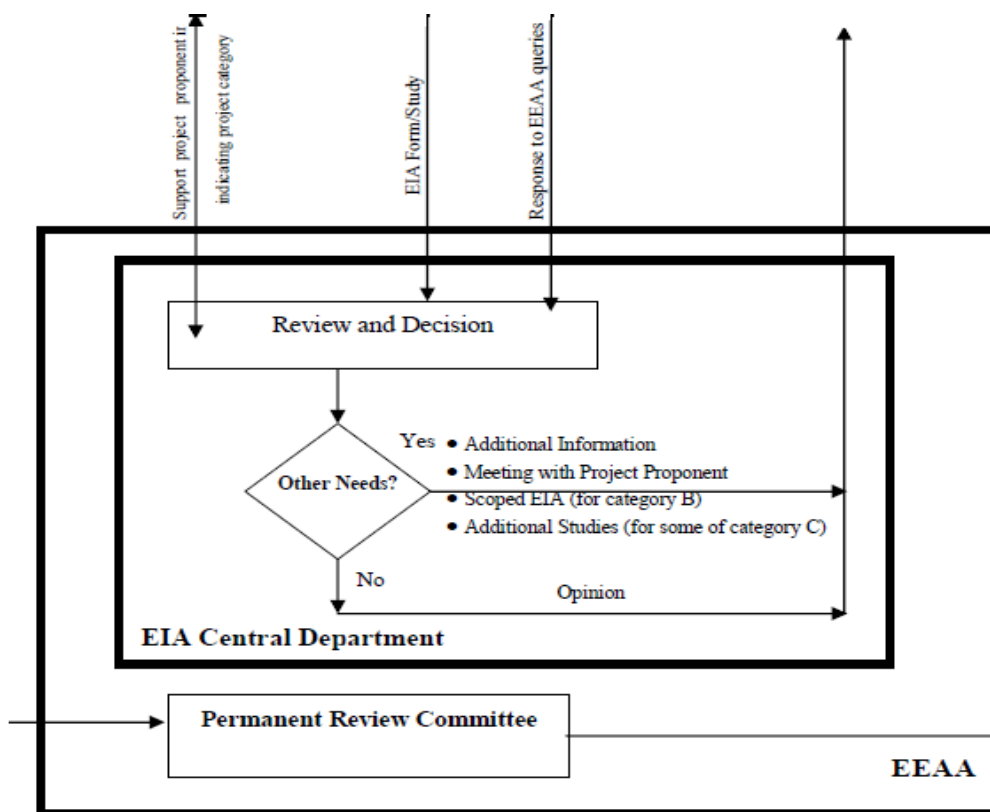
- Identifying the projects subject to the EIA system;
- Indicating the rules and procedures for EIA;
- Categorising the projects according to their environmental impact and the level of assessment.

The EIA system assigns projects into three main categories according to severity of possible environmental impacts and location of the establishment and its proximity to residential settlements which mandates different levels of EIA requirements.

- Category (A): projects with minimal environmental impacts. These are required to complete an environmental impact assessment form A.
- Category (B) / Scoped (B): projects with potential adverse environmental impacts yet less adverse than category C. These are required to complete an environmental impact assessment form B.

- Category (C): projects which have highly adverse impacts. These are required to prepare a full EIA study.

The following process is followed when an EIA is submitted for review by EEAA;



No EIAs have been conducted so far for any of the Project components or for any wider site operations. An EIA will be conducted for the Project in accordance with the regulations described above.

How will the Environmental, Health, Safety and Social Aspects Be Managed?

The following table summarises the main potential positive and negative environmental, health, safety and social (EHSS) impacts related to the project, as well as a summary of the key mitigation measures to ensure that no significant impacts will be realised:

Environmental Resource	Impact Overview	Mitigation Measures Summary
Construction Phase		
Climate and Air Quality	Limited potential for impact, other than from dust very local to construction operations.	<ul style="list-style-type: none"> • No sensitive receptors adjacent to the construction activities • Visual dust monitoring should be undertaken daily during construction, and dust dampening measures taken if required • A complaints hotline should be established for the duration of the works and the number should be

Environmental Resource	Impact Overview	Mitigation Measures Summary
		displayed at appropriate locations on the site boundary
Noise and Vibration	There will likely be a noise impact during the construction phase.	<ul style="list-style-type: none"> • Hearing protection should be provided to construction workers exposed to 85 dBA and above. No workers should be exposed to noise levels over 87dBA • No occupied buildings are located within 50 metres of the proposed Project areas where the construction works will be taking place, although the routing of pipelines and other infrastructure connecting to the DHT have yet to be confirmed, and may be in proximity to other industrial facilities. • Appropriate maintenance of construction plant & machinery to minimise potential for noise. • A complaints hotline should be established for the duration of the works and the number should be displayed at appropriate locations on the site boundary
Hydrology: Surface Water and Groundwater	<p>There is limited potential for impact to water courses as a result of construction activities.</p> <p>Controls on sedimentation and erosion will also be required during construction activities to prevent runoff to soils and surface water bodies.</p>	<ul style="list-style-type: none"> • Contaminated surface water run-off from works within the site boundary will be captured by the site's drainage and treatment system. However, additional controls should be in place during upgrades to the waste water treatment plant where bypass could otherwise occur. • Where construction is to occur offsite (DHT and connecting pipework), appropriate controls for prevention of contaminated runoff and erosion / sedimentation will be implemented. • Construction Best Practice will be employed for the storage of materials and clear-up of any accidental spillages.

Environmental Resource	Impact Overview	Mitigation Measures Summary
Wastewater Management	<p>There is limited potential for impact, but care needs to be taken in the handling of fuels and hydrocarbons and implementation of general site arrangements for spill control.</p> <p>Controls on sedimentation and erosion will also be required during construction activities to prevent runoff to soils and surface water bodies.</p>	<ul style="list-style-type: none"> • Site welfare facilities will be available to construction workers for works within the boundary. Temporary facilities will be provided and managed appropriately for construction works outside the boundary. • Where construction is to occur offsite (DHT and connecting pipework), appropriate controls for prevention of contaminated runoff and erosion / sedimentation will be implemented. • Construction Best Practice will be employed for the storage of materials and clear-up of any accidental spillages.
Geology and Land	No potential for impact outside of the project site.	<ul style="list-style-type: none"> • Undertake a contaminated land survey to benchmark site soil conditions and identify any necessary remediation prior to construction
Ecosystems and Flora & Fauna	The projects will be constructed within the boundary of the current refinery installation, on previously developed land. Ancillary infrastructure such as pipelines may be required outside these locations. However, given the long history of heavy industry and presence of infrastructure in likely routings, no flora or fauna under the protection of international agreements are likely to be impacted.	<ul style="list-style-type: none"> • Included in actions related to general protection of air, water, etc.
Geohazards / Seismic	The site is not located in a seismically active region.	Not applicable
Waste Management	Waste materials will be generated during construction.	<ul style="list-style-type: none"> • Compliance with relevant waste duty of care Regulations. • A waste management plan will be developed for the construction phase detailing collection, storage, treatment and /or disposal methods. • Staff will be trained to segregate and appropriately dispose of waste.
Cultural Resources	The impact on cultural resources is expected to be minimal.	Not applicable
Visual and Landscape	The area is already heavily industrialised and developed. The impact on visual and landscape resources is expected to be minimal.	Not applicable

Environmental Resource	Impact Overview	Mitigation Measures Summary
Land acquisition	<p>The Project will predominantly be constructed within the boundary of the current refinery installation or on land owned by other EGPC companies.</p> <p>Some pipelines and other infrastructure will need to be installed connecting the DHT to the main refinery site. These have yet to be designed and routing determined but, as the land between the DHT and the refinery site is owned and operated by EGPC companies, so land acquisition issues are unlikely to be a significant issue.</p>	Implementation of robust stakeholders engagement processes.
Economic Displacement	<p>The Project will predominantly be constructed within the boundary of the current refinery installation or on land owned by other EGPC companies.</p> <p>Some pipelines and other infrastructure will need to be installed connecting the DHT to the main refinery site. These have yet to be designed and routing determined but, they are likely to cross the International Coastal Road, which may cause disruption to road users and others who require access.</p>	<p>Stakeholder engagement & EIA processes will fully cover assessment of potential for economic displacement during construction.</p> <p>If potential for economic displacement is identified mitigations will be developed and implemented in consultation with stakeholders.</p>
Operational Phase		
Climate and Air Quality	<p>Currently there is insufficient information (monitoring data) in relation to atmospheric releases from the facility to determine the level of air quality impact. However, it has been identified that emission levels are not aligned with international standards, and the investment programme will improve this position across a number of process units on site.</p> <p>In particular there will be a positive impact position in relation the programme of energy efficiency and related greenhouse gas emissions reduction, the implementation of a sulphur recovery unit and sour water stripper, and an off gas abatement system on the waste water plant, all of which will improve the air quality and climate performance of the plant.</p>	<ul style="list-style-type: none"> • Main mitigation components include: • Combustion plant control improvements and heat recovery unit implementation. • Improved emissions monitoring • Substantial capacity increase in off-gas recovery and valorisation. • Improvement in combustion furnace heat recovery systems. • Increased sulphur recovery. • Improved emissions control on the wastewater pre-treatment stages to reduce VOC and odour emissions.

Environmental Resource	Impact Overview	Mitigation Measures Summary
Noise and Vibration	There is potential for operational noise and vibration impacts on nearby sensitive receptors, particularly residential properties.	<ul style="list-style-type: none"> • Selection of suitable equipment, noise absorbers and isolation in project design specifications. • Appropriate maintenance of operational plant & machinery to minimise potential for noise. • No occupied buildings / sensitive receptors are located within 50 metres of the proposed Project areas. • Once the location of the new DHT is confirmed, undertake an appropriate assessment of the potential for noise impact, either as part of the whole refinery, or (for offsite locations) considering potential new receptors.
Hydrology: Surface Water and Groundwater	Sour water stripper units on the effluent discharge are corroded and not effective. Also, current effluent discharges to surface water (sea) have dilution water added before monitoring, so are not to be aligned are not aligned with international standards. Further, oil residues have been discharged to the public sewer, potentially resulting in off-site water environment impact if off site treatability is not optimal.	<ul style="list-style-type: none"> • All works will be within the site boundary and contaminated surface water runoff will be captured by the site's drainage and treatment system. • The new wastewater treatment plant will ensure adequate treatment of site run off to replace the current ineffective system. • New closed loop systems as a result of the reverse osmosis level of treatment of the water, will allow a substantial reduction on raw water use, including towns and seawater. • A well design sea water / brine outfall will ensure no substantial impact to the receiving environment.
Wastewater Management	Currently the wastewater treatment plant is in poor condition and ineffective, and the sour water stripper units are ineffective and not optimised. There is once through cooling system resulting in a high plant water abstraction demand.	<ul style="list-style-type: none"> • New waste water treatment plant to allow substantial water reuse and overall emissions reduction. • Improved emissions control on the wastewater pre-treatment stages to reduce VOC and odour emissions. • Effective design of the seawater outfall, accounting for the increase brine concentrations.
Geology and Land	No significant impact	Not applicable
Ecosystems and Flora & Fauna	No significant impact	Not applicable
Geohazards / Seismic	The site is not located in a seismically active region.	Not applicable

Environmental Resource	Impact Overview	Mitigation Measures Summary
Waste Management	Waste materials generated will be of broadly similar types to current operations.	<ul style="list-style-type: none"> • Compliance with relevant waste duty of care Regulations. • Operation in accordance with site waste management procedures. A waste management plan will be developed detailing waste collection, storage, treatment and /or disposal methods. • Staff will be trained to segregate and appropriately dispose of waste.
Cultural Resources	The impact on cultural resources is expected to be minimal.	Not applicable
Visual and Landscape	The area is already heavily industrialised and developed. The impact on visual and landscape resources is expected to be minimal.	Not applicable
Land acquisition	The Project will operate within the boundary of the current refinery installation or on land owned by other EGPC companies.	Implementation of robust stakeholders engagement processes.
Economic Displacement	The Project will predominantly be constructed within the boundary of the current refinery installation or on land owned by other EGPC companies.	Not applicable

What are the Overall Benefits of the Project?

In the current mode of operation, the APC refinery has a low level of energy performance, a high level of flaring and CO₂ emissions and poor water performance. The proposed investment projects aim to improve the situation.

It is expected that the investment project will:

- Produce better quality, cleaner and low sulphur diesel to Euro V standards
- Reduce sulphur emissions by 38,200 tons per year
- Reduce CO₂ emissions by 1,600 tons per/year (or 32,000 per year in the absence of the investment project and therefore the need to reprocess the diesel abroad and then reimport it)
- Reduce freshwater demand by 600, 000 m³ a year
- Significantly reduce seawater use (for cooling) by 60 million m³ a year and associated discharges of seawater to the sea

In addition, an Environmental and Social Action Plan (ESAP) has been developed in order to align the existing operation and the proposed investment with the EBRD performance requirements. The proposed action areas will result in improved EHSS performance and risk management and benefit enhancement across APC operations, as well as Contractors' operations. Actions in the ESAP include:

- Carry out an environmental and social impact assessment(s) (ESIA) as required by Egyptian legislation and obtain necessary permits for the investment programme components.

- Design and implement the new site waste water treatment plant to achieve BAT emission levels based on the EU BAT Reference note / Best Available Techniques (BAT) conclusions for the Refining of Mineral Oil and Gas¹.
- Augment the monitoring programme for wastewater discharges, including installation of a Continuous Environmental Monitoring System (CEMS)
- Develop and implement a formal procedure for waste management, covering segregation, storage and disposal to improve current waste management practices.
- Undertake a detailed study to inform the development of an upgrade programme for Oil / Products Storage across the sites, in terms of pollution avoidance.
- Install continuous emissions monitoring systems (CEMS) on all main emission stacks – process combustion units and boilers / new combustion plants
- Undertake a review of point source and fugitive volatile organic carbon (VOC) emissions to air from across the refinery to quantify and prioritise the VOC emissions sources under each of the two categories.
- Upgrade the Sour Water Stripper to ensure reliable operation and also to provide treatment capability for the planned increases in production capacity.
- Upgrade emission monitoring procedures at the refinery in line with EU BAT to ensure fully accurate monitoring, recording and compliance assessment approaches. Undertake a review of APC refinery emissions against EU BAT associated emission limits.
- Reduce NOx emissions from the combustion units at the refinery
- Undertake a detailed study into the use of flaring for pressurisation control from the crude distillation units, and produce a feasibility study into the potential for overall reduction of flaring from these units
- Undertake an initial assessment of the sources of potential off site noise impacts
- Several ESAP items have been assigned, relating to process safety, including:
 - Incorporation of flammable gas detectors under all LPG vessels
 - Expansion of the QRA to incorporate additional scenarios and other aspects.
 - Implementation of actions from QRAs
 - Review of alarm processes
 - Review of firefighting plan
 - Upgrade to storage in chemicals warehouse
 - Update of process safety information
 - Completion of a HAZOP for the new Project
 - Completion of a basis of safety review or process hazard analysis (PHA) where HAZOPs do not exist
 - Expansion of Hazardous Areas Classification to the entire refinery
 - Upgrade of emergency response plans including formal communications protocols and shared ERP with adjacent facilities
 - Management of safety critical equipment & spares
- Several ESAP items have been assigned, relating to occupational health & safety, including:
 - Occupational exposure to & monitoring for chemicals, noise, heat
 - Risk assessment, registration, segregation, labelling and storage of chemicals
 - Safety signage
 - Enforcement of safety rules, including permit to work procedures.

¹ Commission Implementing Decision of 9 November 2014 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions, for the refining of mineral oil and gas & Best Available Techniques (BAT) Reference Document for the Refining of Mineral Oil and Gas Industrial Emissions Directive 2010/75/EU Integrated Pollution Prevention and control. Both available here: <https://eippcb.jrc.ec.europa.eu/reference>

- Reinforcement of H&S training
 - Segregation of traffic and pedestrians
 - Machine risk assessment
 - Improvement of housekeeping
 - Management of asbestos
 - Controls on work at height
- Develop a communication strategy to engage with the public (and privately owned companies not part of the Alexandria Geographical Area) to ensure they understand the potential major accident hazards, the safety measures taken and what to do in case of a major accident. This dialogue should include information on emergency plans and alarms indicating that a major accident event has taken place.

3. How will stakeholders be engaged in the project?

What is the Stakeholder Engagement Plan (SEP)

A Stakeholder Engagement Plan (SEP) has been developed for APC with the objective of identifying key stakeholders and ensuring that, where relevant, they are informed in a timely manner of the potential impacts of projects. The plan will also identify a formal grievance mechanism to be used by stakeholders for dealing with complaints, concerns queries etc. It will be reviewed and updated on a regular basis. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during project implementation and updated as necessary.

The SEP includes the following:

- Project description, location of the site and key environmental and social issues;
- Public consultations and information disclosure requirements;
- Identification of stakeholders and other affected parties;
- Overview of previous APC's stakeholder engagement activities;
- Stakeholder engagement programme and methods of engagement and resources; and a
- Grievance mechanism.

Who are the Key Stakeholders?

Stakeholders could be individuals and organisations that may be directly or indirectly affected by the project either in a positive or negative way, who wish to express their views. The definition applied to identify key stakeholders is:

'any stakeholders with significant influence on or significantly impacted by, the work and where these interests and influence must be recognised if the work is to be successful'.

Key stakeholders have been identified from the following categories: international (EBRD); governmental (Republic of Egypt, EEAA, relevant Ministries, Municipalities and other relevant local authorities); advisory non-government; services / suppliers; clients; institutions (universities, think tanks, etc.); the industrial sector (trade bodies, other industrial sites, contractors, suppliers), internal stakeholders (employees); local communities (towns, villages, farmers, other potentially affected people, fishing communities and bodies); public groups (local schools, hospitals, etc.); and the media.

What is the Procedure for Communicating with Stakeholders?

The SEP outlines the methods that APC will adopt to ensure effective stakeholder engagement is undertaken, providing details of the programme of future public consultation and information disclosure that will be recorded for major projects. APC will record the following information on an ongoing basis:

- Type of information disclosed, in what forms (e.g. oral, brochure, reports, posters, radio, etc.), and how it was released or distributed.

- The locations and dates of any meetings undertaken to date.
- Individuals, groups, and / or organisations that have been consulted.
- Key issues discussed and key concerns raised.
- Company response to issues raised, including any commitments or follow-up actions.
- Process undertaken for documenting these activities and reporting back to stakeholders.

If there are questions, queries, complaints or grievances regarding future projects, a grievance mechanism has been developed to address these issues and a grievance form will be used to record this information. The grievance form and the outline on how to use the grievance form is provide below.

A grievance mechanism will be adopted in which the grievance form presented below will be used as required to handle grievances from non-employees. The mechanism will be as follows:

- Grievance received
- Grievance recorded in a register
- For an immediate action to satisfy the complaint, the complainant will be informed of corrective action
- Implement corrective action, record the date and close case
- For a long corrective action, the complainant will be informed of proposed action
- Implement corrective action, record the date and close case

A grievance should be recorded by the complainant using the grievance form below, ensuring that contact details are provided with the preferred method and language of communication. A clear description should be provided of the incident or grievance. APC will respond to grievances within one month of receiving the form.

A grievance form is attached to this NTS, to the stand-alone SEP (Stakeholder Engagement Plan) and will be available from the APC offices within the Alexandria refinery and on the APC's website www.alex-petroleum.com.

Public Grievance Form

Reference No:	
Full Name <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	My first name _____ My last name _____ I wish to raise my grievance anonymously I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____ _____ By Telephone: _____ By E-mail _____
Preferred Language for communication	English Arabic Other (specify)
Description of Incident or Grievance:	
What happened? Who did it happen to? Where did it happen? What is the result of the problem?	
Date of Incident/Grievance	
	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

4. Glossary

APC	Alexandria Petroleum Company
ARU	Amine regeneration unit
BAT	Best available technique
BMS	Burner management system
BREF	Best available techniques reference document
CAPEX	Capital expenditure
CEMS	Continuous emissions monitoring system
DHT	Diesel hydro-treatment
EBRD	European Bank for Reconstruction and Development
EEAA	Egyptian Environmental Affairs Agency
EHS	Environmental health and safety
EHSS	Environmental, health and safety and social
EIA	Environmental impact assessment
EMS	Energy management system
ESAP	Environmental and social action plan
ESDD	Environmental and social due diligence
EU	European Union
ha	Hectares
km	Kilometre
NTS	Non-technical summary
PSA	Pressure swing absorption
QRA	Quantitative risk assessment
SRU	Sulphur recovery unit
SWS	Sour water stripper
T	Tonnes
VOC	Volatile organic compounds
VRU	Vapour recovery unit
WWTP	Wastewater treatment plant