

ALEXANDRIA PETROLEUM COMPANY, EGYPT

STAKEHOLDER ENGAGEMENT PLAN

November 2020

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Public

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1. Introduction

Background

This document is a Stakeholder Engagement Plan (SEP) for Alexandria Petroleum Company (APC), identifying relevant stakeholders and defining communication channels and plans regarding our facility located in Alexandria, Egypt.

The SEP provides an overview of national legislation, the European Bank for Reconstruction and Development (EBRD) Performance Requirement 10: Information Disclosure and Stakeholder Engagement European Union (EU) directives and international best practice related to information disclosure. It outlines the general approach to stakeholder engagement and public consultation.

The SEP is a living document so it will be reviewed periodically during project implementation and updated as necessary in line with new or changed activities, changes in Project design or newly identified stakeholders.

Objectives of the Plan

The goal of this SEP is to build long-term relationships between APC and the local communities; to improve and facilitate decision-making that involves Project-affected people and other interested stakeholders in a timely manner, and to ensure that these groups are provided with sufficient opportunity to voice their opinions about the Project.

The SEP defines the methods, procedures, policies and activities that will be implemented by APC to inform stakeholders about the nature and the potential impacts associated with the following proposed plant upgrades (the Project):

- New Diesel Hydro-Treatment (DHT)
- Pressure Swing Absorption (PSA);
- Pollution & Emissions Reduction investments; and
- Resource / energy efficiency investments

The SEP contains a stakeholder identification table where all relevant stakeholders are identified with the most appropriate communication channels and strategies, information disclosure requirements and grievance processes that will be adopted. If there are stakeholders who are not included in the SEP they can get in contact with the contact provided above to receive information about the Project and be added to the stakeholder engagement programme in this SEP.

Specific objectives of the SEP are detailed below:

- Define the Project area
- Identify, map and assess affected parties and other interested stakeholders, and how they may be affected by or interested in the Project;
- Set out stakeholder analysis undertaken to understand Project stakeholders, so that appropriate methods and tools to engage them can be developed;
- Provide an action plan for consultation that allows for meaningful stakeholder input into the Project;
- Ensure stakeholders have access to information on Project activities in a timely manner
- Ensure information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend;
- Ensure that vulnerable and disadvantaged groups (including women, elderly and disabled etc.), are identified and that practical measures are implemented to include them in ongoing consultation;

- Establish clear mechanisms for managing stakeholders' questions, concerns, and grievances and provide appropriate conflict resolution processes;
- Manage expectations among communities and other stakeholders;
- Document formal consultation and information disclosure activities, define stakeholder tracking and records management system.

Scope of the Plan

This Stakeholder Engagement Plan covers APC operations at the Alexandria Refinery facility including contractor activities and includes:

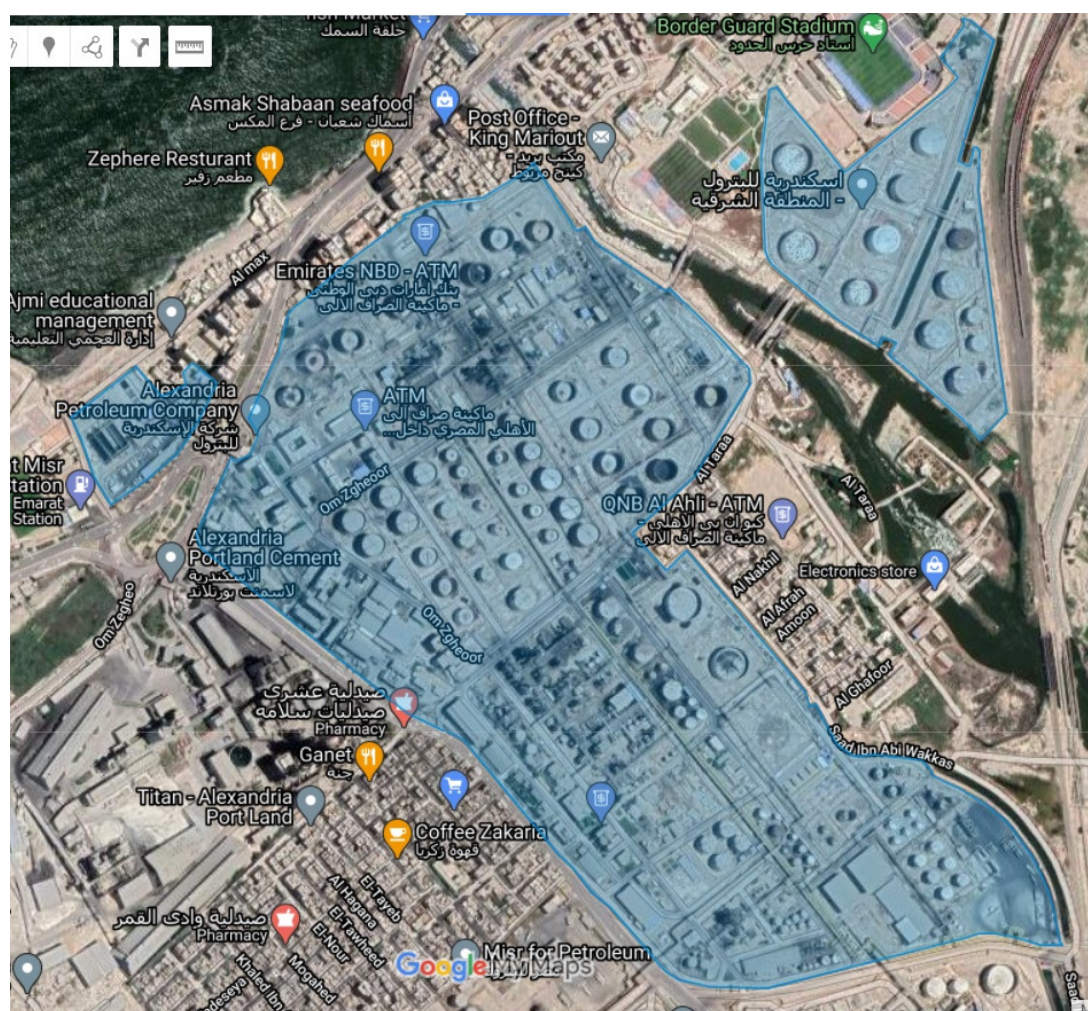
- Chapter 2 – Project overview and setting;
- Chapter 3 – Public consultations and information disclosure requirements;
- Chapter 4 – Identification of stakeholder and other affected parties;
- Chapter 5 – Overview of current stakeholder engagement practices;
- Chapter 6 – Stakeholder engagement programme and methods of engagement and resources; and
- Chapter 7 – Grievance mechanism

2. Project Background

Overview of the Company

The Alexandria Refinery is operated and owned by APC, a 100% fully owned subsidiary of the Egyptian General Petroleum Corporation (EGPC), an economic state corporation affiliated to the Egyptian Ministry of Petroleum. It is located approximately 8 km west of the centre of Alexandria.

Figure 1: Site Location



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.

Investment Project

The EBRD is considering providing finance to APC to support their investment programme (the "Project") at its refinery in Alexandria, Egypt. The investment programme includes :

→ New Diesel Hydro-Treatment (DHT)

- Pressure Swing Absorption (PSA);
- Pollution & Emissions Reduction investments; and
- Resource / energy efficiency investments

Rationale for 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)**

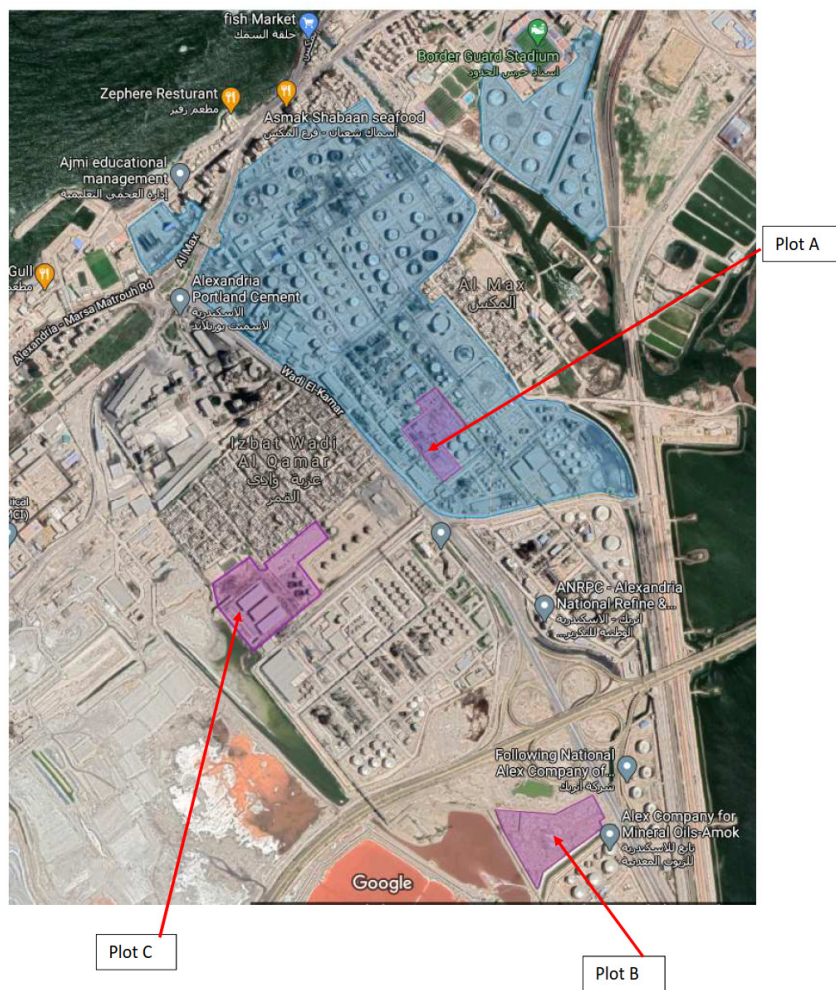
→ Installation of **Pressure Swing Absorption (PSA)**

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 2.

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 proposed at this stage.

Figure 2: Proposed Project Locations



3. Consultation and Disclosure

Public consultation and information disclosure undertaken by APC will comply with the requirements of Egyptian legislation and best international practice, as described in the requirements of the EBRD.

National Legislative Requirements

EIA Requirements and Procedure

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.

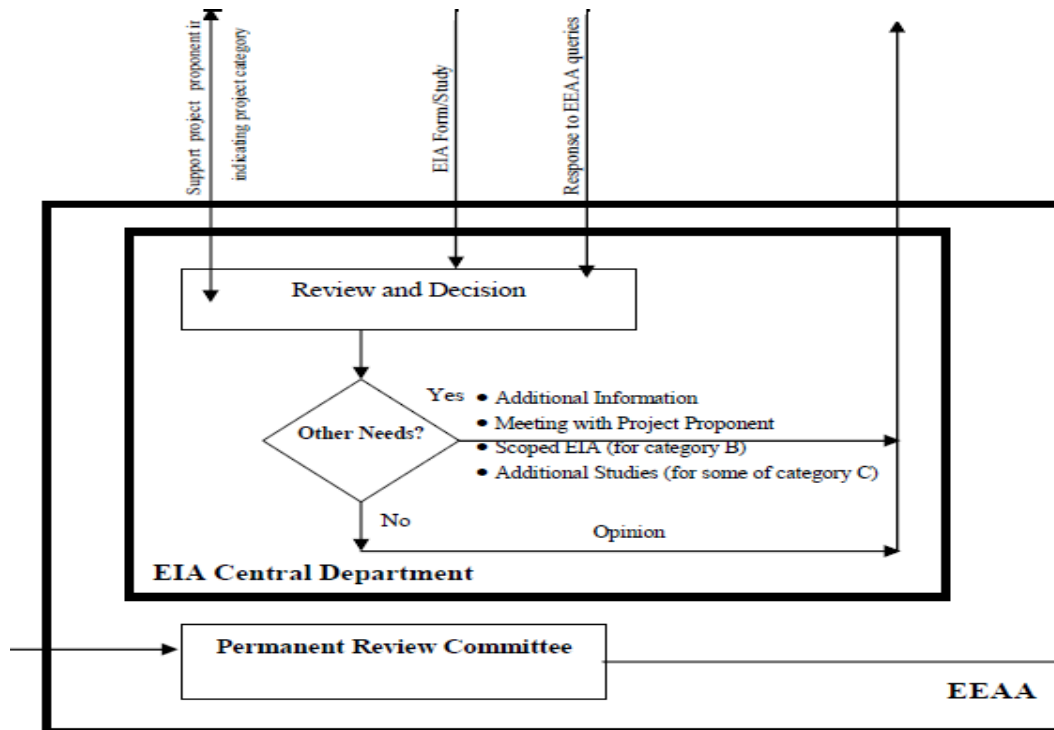
EEAA has developed detailed principles of the EIA system which include the following aspects:

- 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;



EEAA Guidelines Related to Public Consultation

EEAA Category 'C' projects require consultation and disclosure with the community and concerned parties, where all the stakeholders invited are provided with project related information. Paragraph 6.4.3 of EEAA EIA guidelines provides detailed information about the scope of public consultation, methodology and documentation thereof.

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

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.

Best International Practice

EBRD is committed to promoting environmentally sound and sustainable development in accordance with its *Environmental and Social Policy* (May 2014) and the *Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement*. EBRD sets out their stakeholder engagement requirements in the following documents:

- Environment and Social Policy (2014) and PR 10 Information Disclosure and Stakeholder Engagement (2014)
- Access to Information Policy and Directive (2019)

EBRD considers public consultation and stakeholder engagement and the disclosure of information as an on-going, meaningful and inclusive process, to be started at the earliest stage of the environmental and social assessment process and to be continued throughout the entire life of the EBRD financed project. This SEP is in response to the EBRD's requirement for stakeholder engagement and information disclosure.

The investment programme is categorised a Category B Project in terms of the EBRD's Environmental and Social Policy. As a Category B Project, APC will adopt this SEP including a grievance mechanism. The SEP developed is commensurate to the nature of the investment projects and their associated environmental and social impacts, and the level of anticipated public interest. The programme will be rolled out in a timely manner. It will include details of locations and timings of construction to ensure that adequate stakeholder engagement is conducted.

On an annual basis, APC will produce a public report on their social and environmental performance, including progress made with the implementation of an Environmental and Social Action Plan (ESAP) that has been developed, against agreed indicators and targets and also report on resolution of grievances associated with the project.

General Stakeholder Communication Records Maintenance

Consultation records, minutes of meetings and write-ups of informal consultations will be maintained by APC, clearly logging the key information provided to stakeholders and also the key incoming communications, complaints and questions along with a summary of actions taken.

As part of this communication procedure, APC will record and update these stakeholder engagement activities on an on-going basis and will prepare annual reports summarising the activities and key emerging themes raised by affected people.

4. Stakeholder Identification

Identification of Main Stakeholders

This section identifies all relevant stakeholders including interested parties and other affected communities, local, district and regional level authorities. Stakeholders could also 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.

In order to identify key stakeholders, the following definitions have been applied:

- **Stakeholders:** any person, group or organisation with a vested interest in the outcome of the Project
- **Key stakeholders:** any stakeholder with significant influence on or significantly impacted by the Project

There are other partnerships that are important for the implementation of the Project and addressing groups or individuals with a particular interest in the Project who must be recognised to facilitate the project work, is a requirement.

Stakeholders can be grouped into the following categories:

- International (e.g. investors, IFIs)
- Government (e.g. Egyptian state, relevant Ministries, Municipalities and other relevant local authorities)
- Advisory non-governmental organisations
- Services/suppliers
- Clients
- Education and training institutions (e.g. universities, colleges, think tanks)
- Industrial sector (e.g. construction and infrastructure trade bodies)
- Internal stakeholders (e.g. employees, employee representation, trade unions)
- General communities (e.g. affected settlements, local community groups)
- Public groups (e.g. hospitals, local schools, institutions of national heritage)
- The media

If stakeholders are not on the list above and would like to be kept informed about the Project, contact should be made with APC (contact details provided on the front cover).

Table 1 below represents the identified stakeholders in accordance to above classification.

Table 1: Stakeholder Classification

Stakeholders that will be Directly or Indirectly Affected by the Project	Stakeholders that Participate in the Implementation of the Project	Stakeholders with Potential to Influence Decisions on Project Implementation
<ul style="list-style-type: none"> → Residents of municipalities, villages and communities which could potentially be affected by the refineries activities → Land owners and land users adjacent to the site → Agricultural activities adjacent to the site → Residents along transport routes and adjacent to the site → Neighbouring industries → Business Community → Operators/owners of local infrastructure (water pipelines, roads etc.) → Staff living within the boundary of the site 	<ul style="list-style-type: none"> → EBRD (Lender) → APC → EGPC → Employees of APC (internal stakeholders) → Construction companies and other subcontractors → Employees of construction companies and other subcontractors → Equipment suppliers → Employees of the suppliers 	<ul style="list-style-type: none"> → Egyptian Environmental Affairs Agency (EEAA) → Other companies within the Alexandria Geographical Area → Ministry of Trade and Industry → Ministry of Health → Ministry of Labour and Migration → State Agencies (environment, forestry, energy, labour, etc.) → Local governors and municipalities → Local Government → Local emergency services – specifically the fire department → NGOs – Associations on local and national level → Media → General Public

Key Stakeholders Identified During the Development of this Plan

The project stakeholders identified at this stage are presented in Section 5, Table 2 with an analysis of the best ways to engage with them according to the media/tools that they are likely to use and be most comfortable with. The identification of relevant stakeholders is of crucial importance to ensure meaningful consultation on the Project.

Stakeholders that were not identified during this process should contact APC to request their addition to the list.

Vulnerable Groups

The stakeholder identification process examined if there are any groups of affected people who might be more vulnerable to current and potential Project impacts. Discussions have been held with relevant personnel from several institutions that are responsible for Project design and implementation to identify vulnerable groups.

During the assessments and the preparation of this SEP, groups were examined who might be affected by the projects differently due to their gender, age, ethnicity, religion, physical or mental disability or other attributes. The assessment identified that there are no vulnerable groups affected by the project who might require different channels of communication.

During Project implementation APC may identify vulnerable groups who will then be added to the SEP and appropriate communication methods will be identified.

5. APC Stakeholder Relations and Approach

Overview of Existing Stakeholder and Community Relations

Stakeholder engagement and the organisation of public hearings is a requirement under Egypt's EIA regulation (please refer to Section 3 for more information). APC's approach is to work in close cooperation with relevant Ministries, municipal, district and local authorities. Stakeholder engagement is carried out at a grassroots level strengthening the relationship between communities, local authorities and the company.

Historical stakeholder engagement processes has primarily revolved around engagement on regulatory matters along with internal engagement of employees.

As part of this SEP, there is a formal grievance mechanism for external stakeholders with an appropriate form to record complaints, comments and questions about the Project and an institutional framework with designated roles and responsibilities to manage the process, as provided in Figure 2.

Table 2 below shows the general key stakeholders and interested parties for the APC refinery in Alexandria. This table will be updated if new stakeholders are identified during the course of the projects.

Table 2: Stakeholder Groups

Stakeholder Groups	Key Stakeholders	Summary of Key Specific Interest
International	EBRD – London HQ Address: One Exchange Square, London EC2A 2JN, UK. Tel: +44-207-338 6000 EBRD – Cairo Address: EGID Building, First Floor, Block 72, off Ninety Axis, 5th Settlement, New Cairo, Cairo, Egypt	Environmental and Social good practice and performance of APC, Compliance of APC with EBRD Environmental and Social requirements Implementation of the Environment and Social Action Plan by APC
Government (State)	Ministry of Petroleum Address: 1 Ahmed Elzomor St, Nasr City, Cairo Governorate Tel: 02 26706401 Email: contact@petroleum.gov.eg http://www.petroleum.gov.eg/ar/Pages/default.aspx Ministry of Environment (Head Office) Contact person: Head of EEAA Address: 30 Misr Helwan El-Zyrae Road, Maadi, Cairo Tel: +20-2-2525 6452 http://www.eeaa.gov.eg/ Egyptian Environmental Affairs Agency (Headquarter) Address: 30 Misr Helwan El-Zyrae road, Maadi, Cairo Governorate Tel: 02-25256452 / 19808 (hotline) http://www.eeaa.gov.eg/en-us/contactus.aspx	National environmental policy and protection Water abstraction Plant emissions Waste management Resource efficiency Worker welfare and health and safety standards Permits for specific activities carried out on site Permits to operate / permission for emissions Planning preparedness for emergencies Customs regulations

Stakeholder Groups	Key Stakeholders	Summary of Key Specific Interest
	<p>Ministry of Water Resources & Irrigation Contact person: Coordinator Address: Gamal Abdel Nasser Street, next to Rod El Farag Bridge, Al Warraq, Giza Tel: +20-2-2263 0702 / +20-2-4218 7533 / +20-2-3544 9420 http://www.mwri.gov.eg/</p> <p>Egypt Cabinet Address: 2 Magless El Shaàb st., Al Kasr El Einy, Cairo, Egypt. Tel: +202-2793-5000 www.cabinet.gov.eg</p> <p>Ministry of Manpower & Immigration Contact person: Head of Legislation Department Address: 3 Youssef Abbas, Ash Sharekat, Nasr City, Cairo Governorate. Tel: 02 22609361 manpower.gov.eg</p> <p>Egyptian Trade Union Federation Address: 90 El Galaa St, Al Azbakeyah, Cairo Governorate Tel: 02 25740362. http://etufegypt.com/ (Headquarter)</p>	
Governorates, Municipalities	<p>Civil Defence and Fire Department Address: Kom Ad Dakah Gharb, Al Attarin, Alexandria Governorate. Tel: 03 3934206 / 03 3934207</p> <p>Alexandria Security Directorate Address: 14th of May Bridge Rd., Ezbet Saad, Sidi Gaber, Alexandria Governorate. Tel: 03 4247717</p> <p>Secretary General Office of Alexandria Governorate Address: Alexandria Agriculture Rd., Abis, Qism El-Raml, Alexandria Governorate. Tel: 03 4225327 / 03 4225427 http://www.alexandria.gov.eg/</p> <p>Alexandria Governorate Public Relations Department Address: Alexandria Agriculture Rd., Abis, Qism El-Raml, Alexandria Governorate Tel: 03 4225327 / 03 4225427</p> <p>Alexandria Governorate General Authority for Administrative Control Address: Izbat Saed, Qesm Sidi Gaber, Alexandria Governorate Tel: 01206757571 http://www.aca.gov.eg/english/Pages/default.aspx (Headquarter)</p> <p>Alexandria Governorate Environmental Affairs Agency Address: Cairo – Alexandria Dessert Rd., Om Zegho, Al Amaria First, Alexandria Governorate</p>	Regulator and legislator bodies at local, regional levels and national level covering planning consents, permits, licences, projects and statistical reporting for waste, water and ambient air

Stakeholder Groups	Key Stakeholders	Summary of Key Specific Interest
	<p>Tel: 03 3024477</p> <p>Local Union of Alexandria Labor</p> <p>Hod Sakrah WA Abu Hamad, Borg Al Arab Al Gadida City, Alexandria Governorate</p> <p>Tel: 03 4596021</p> <p>Manpower & Immigration Directorate – Alexandria Governorate</p> <p>Address: 19 Mostafa Kamel, Ezbet Saad, Sidi Gaber, Alexandria Governorate</p> <p>Tel: 03 4211846</p> <p>http://www.manpower.gov.eg/ (Headquarter)</p> <p>Professional Health & Safety Bureau of El Dekhaila - Alexandria Governorate</p> <p>Address: Al Hanoville, Dekhela, Alexandria Governorate.</p> <p>Tel: 03 3011704</p>	
Non-Government Organisations (NGOs) and other organisations	<p>International Labour Organization (ILO)</p> <p>Contact person: Head of the Cairo Office</p> <p>Address: 9 Taha Hussein – Zamalek St, Cairo</p> <p>Tel: +20-2-2735 0123</p> <p>Academy of Scientific Research & Technology (ASRT)</p> <p>Contact person: Coordinator</p> <p>Address: 101 Kasr Al Ainy Street, Garden City, Cairo</p> <p>Tel: +20-2-2792 1263 / +20-2-2792 1264</p> <p>http://ar.asrt.sci.eg/</p>	<p>Guidance on EHSS technical matters, standards and policies</p> <p>Knowledge sharing</p>
Operational suppliers, clients and client representation	<p>Crude oil suppliers</p> <p>Chemicals suppliers</p>	Raw material demand
Internal stakeholders (Employees, labour unions)	<p>Internal employees</p> <p>Contractor staff on projects</p>	<p>Training</p> <p>Employment and social policies & procedures</p> <p>Labour safety</p>
Contractors / Service providers	Consulting companies – engineering, construction	Other procedures / policies, migrant workers, etc.
Neighbouring communities including fishing communities	City of Alexandria	<p>Potential for incidents during construction or operation.</p> <p>Local air quality, land use, construction traffic</p> <p>Engagement on future development works</p> <p>Environmental and local community impacts</p> <p>Emergency preparedness</p>

Stakeholder Groups	Key Stakeholders	Summary of Key Specific Interest
Education and training institutions	Alexandria University Address: Algeish Rd, Alshatby, Qism Bab Sharqi, Alexandria Governorate. Tel: 03 5921675 https://alexu.edu.eg	Labour demand Technical knowledge sharing
Public groups	Kasr Elshefa Hospital Address: 2 Alexandria – Matrouh Rd, Al Meks, Dekhela, Alexandria Governorate. Tel: 01119020001 Alqabbary Geneeral Hospital Address: Al Amir Looloo, Al Qabari, Qism Mina El-Basal, Alexandria Governorate Tel:03 4408607	Potential for incidents during construction or operation. Local air quality, land use, construction traffic Engagement on future development works Environmental and local community impacts Emergency preparedness

Summary of the Methods of Future Engagement Activities

Future stakeholder engagement will build on the informal processes that currently exist along with the requirements of this SEP. The planned future activities will provide for a more systematic way of consultation and information disclosure, and data recording from relevant and interested stakeholders. Stakeholder engagement activities will record the following information on an on-going basis:

- Type of information disclosed, date and form of disclosure and distribution channels
- Minutes of meetings, lists of participants and locations of any meetings organised with affected people
- Individuals, groups, organisations and institutions that have been consulted
- Key issues and concerns discussed and raised by affected people
- Response mechanism, follow-up actions and investigations
- Documentation of activities and processes and response to stakeholders

The information about stakeholder engagement activities will be updated on an on-going basis and all public consultation details related to the project will be included.

6. Stakeholder Engagement Programme

Disclosure of Information

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in Table 3 below. The objectives of external communications are to provide continuous engagement with affected people and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the project. The information to be disclosed publicly is governed by EBRD's Public Information Policy, PR 10 and Egyptian national legislation.

The SEP is a live document that will be revisited and updated if necessary on an annual basis to reflect the changes in stakeholder engagement due to project developments and new stakeholders if any. The information that is required to be disclosed may change if there are changes in the Project design, schedule or area of influence. The external and internal communication methods and information for disclosure identified in Table 3 are not exclusive and APC may choose to disclose more information upon request by stakeholders.

APC is responsible for internal and external communications regarding the existing and future projects and will be the main contact point for affected people. All related Project documents and communication related to the Projects will be available and undertaken in Arabic.

The Future Programme

The envisaged programme of public consultation and disclosure activities are presented below. This programme includes immediate consultation and engagement activities required to address current stakeholder concerns, as well as regular consultation and disclosure activities throughout the project life cycle.

Contact details and responsibilities for SEP implementation are as follows:

Name: Dr. Mohamed Hamdy

Title: General Manager Assistant and Deputy Project Manager (APC)

Telephone: +201091444779

Address: Al Meks, Dekhela, Alexandria Governorate, Egypt

E-mail: mohamedhamdyabdo@alex-pc.com

Website: www.alex-petroleum.com

APC will collate any comments and feedback associated with this project and will document these.

All comments received will be reviewed in accordance with the commitments made under 'Best International Practice' as documented within the 'Requirements' section provided in Section 3. All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.

The Future Stakeholder Engagement Programme is detailed Table 3 below.

Table 3: Future Stakeholder Engagement Programme

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
Affected people, residents, employees and other commercial operations nearby (within the Alexandria Geographic Area)	Information boards with post box, online system, local media and personal visits to town halls municipalities/governorates, isolated houses	Non-technical Summary of Project (NTS), grievance mechanism, vacancies, Stakeholder Engagement Plan EIA not required decision or any EIA and supplementary information if required. Timeline for construction, EHS performance data.	Prior to construction as well as during project implementation a monthly update on grievances and quarterly update on vacancies. Prior to commissioning of any new or changes to existing processes.
Residents of other villages / towns in the area	Information board, mass media, internet, documents on request in nearest local library to the project	NTS, grievance mechanism, vacancies, EIA not required decision or any EIA and supplementary information if required.	Prior to construction and during project implementation and operation Quarterly update on vacancies
Regional public	Newspapers, internet, nearest job centre to APC facility	NTS, grievance mechanism, vacancies	Quarterly update
Regional media	Telephone, e-mails	Detailed project information and NTS upon request	Quarterly update
Local non-government organisations (NGO)	Telephone, newspaper, documents and meetings upon request	Detailed project information on NTS upon request	Quarterly update
Construction workers (APC and sub-contractors employed by APC and principal contractors)	Information boards and meetings in construction area welfare facility	NTS, health and safety requirements, workers protection requirements, workers' grievance mechanism	Prior to construction, monthly updates during construction
Suppliers of goods and services	APC procurement department, project site offices, office visits and internet	NTS, tender documentation and results, contractor selection process, procurement requirements with EHS and workers protection	Quarterly update

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
		requirements, grievance mechanism	
Secretary General Office of Alexandria Governorate	Submission of Project Presentation File Submission of EIA & supplementary information	EIA not required decision EIA and supplementary information where required	At design stage and prior to construction of new processes or upgrades to existing processes
Ministry of Petroleum Ministry of Environment (Head Office) Egyptian Environmental Affairs Agency (Headquarters) Ministry of Water Resources & Irrigation Egypt Cabinet Ministry of Manpower & Immigration Egyptian Trade Union Federation Civil Defence and Fire Department Alexandria Security Directorate Secretary General Office of Alexandria Governorate Alexandria Governorate Public Relations Department Alexandria Governorate General Authority for Administrative Control Alexandria Governorate Environmental Affairs Agency Local Union of Alexandria Labor Manpower & Immigration Directorate – Alexandria Governorate Professional Health & Safety Bureau of El Dekhaila - Alexandria Governorate	Formal e-mails	EIA (where required), annual reports on emissions, use of resources and compliance with legislation and permits	Prior to construction of new processes or upgrades to existing processes During operation of facility Biannual submission or in line with permit / licence requirements
EBRD	Annual reporting	Annual reports of social development, environmental protection and	One year after loan signing agreement /

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
		implementation of Stakeholder Engagement Plan including resolution of grievances associated with the project. Status of ESAP	reports provided annually comprising: → ESAP status → Resolution on grievances
International NGO International Labour Organization	No direct contact, documents available on EBRD and APC websites	NTS	For the loan duration

7. Reporting and Grievances

Monitoring, Reporting and Feedback Mechanisms

APC will monitor the communication channels such as media, one-to-one meetings and periodic meetings and will provide feedback as appropriate. A complaint and suggestion box will be available for stakeholders participating in public consultation meetings and will also be available online or by contacting APC using the details within this SEP.

Any complaints and suggestions raised will be registered in the log for complaints and suggestions. These will then be sent to senior management for the further consideration.

Independent consultants in line with annual monitoring of the ESAP implementation should undertake annual monitoring of the SEP implementation including the implementation of the grievance mechanism. This will include the examination of documentation on public hearings, information disclosure and any other form of stakeholder engagement undertaken as part of the SEP.

Grievance Mechanism

A grievance mechanism will be implemented to ensure that APC is responsive to any concerns and complaints particularly from affected stakeholders and communities. Special care will be focused on the training of the designated staff involved in the management of the grievance mechanism. This grievance mechanism covers both employees and non-employees (i.e. affected people and other relevant stakeholders).

Any comments or concerns can be brought to the attention of the company verbally or in writing (by post or e-mail) or by filling in a grievance form (example included as Appendix A). The grievance form will be made available on the company website, at the facility, at the mayor's office/town hall within the city of Alexandria and other public places that are easily accessible for all relevant stakeholders, alongside a description of the grievance mechanism. Grievance forms can then be submitted to the contact details provided in Section 6.

All grievances will be:

- Acknowledged within 14 working days
- Responded to no later than within 30 working days

Specifically nominated and trained members of staff will record grievance information in a grievance log (example included as Appendix B). This will include:

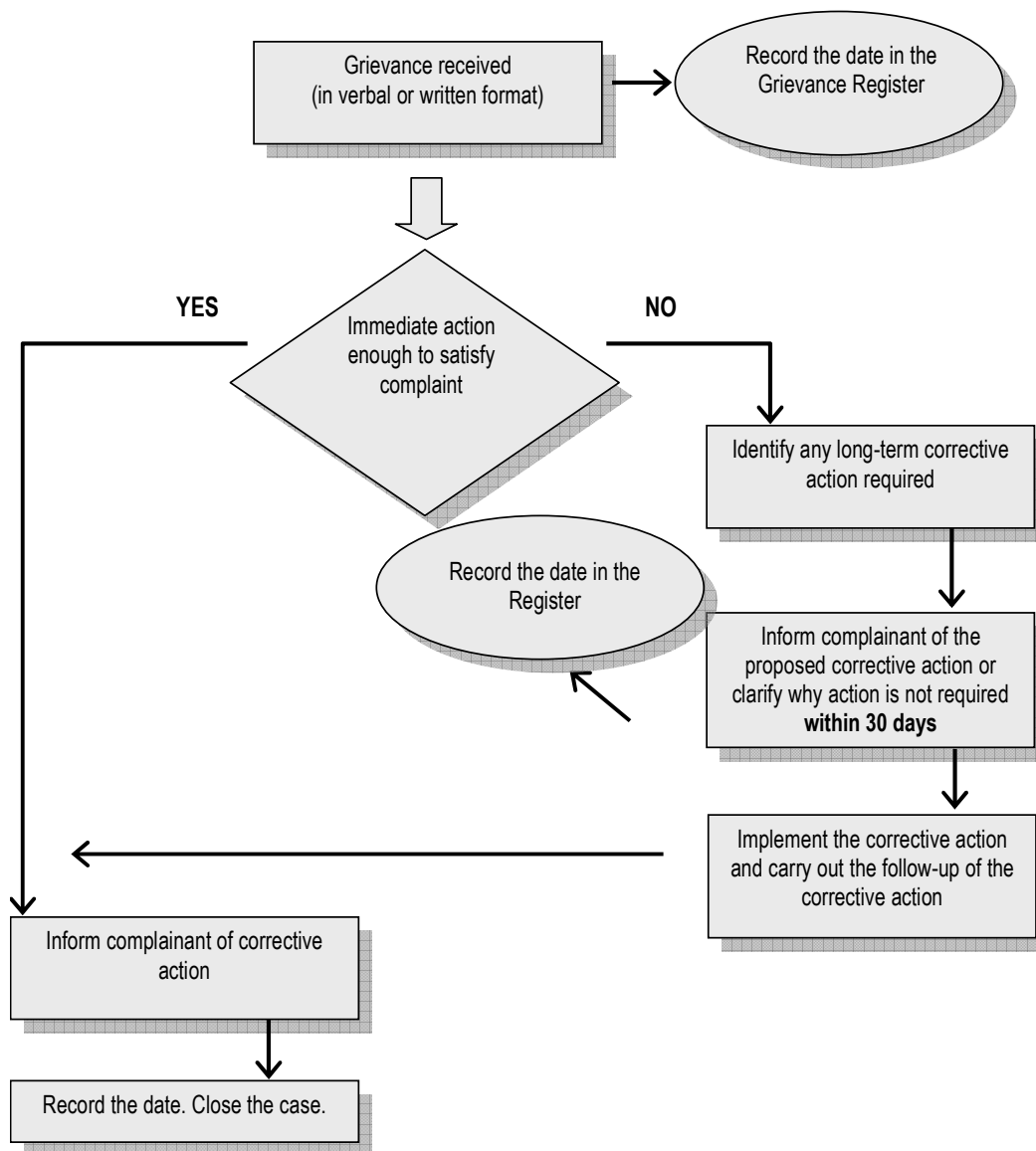
- Stakeholder name and contact details
- Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out

The process is depicted in Figure 3.

Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

A grievance form is attached to this SEP, to the stand-alone NTS (Non-Technical Summary) and will be available from the offices at the Alexandria facility and on the APC website.

Figure 3 Grievance Mechanism



Roles and Responsibilities

Dr. Mohamed Hamdy will have the overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process, communications with identified stakeholder groups, collecting and processing comments / complaints, and responding to any such comments and complaints. Depending on the nature of a comment / complaint, some comments or complaints will be provided to the appropriate person in the company for a response.

Name: Dr. Mohamed Hamdy

Title: General Manager Assistant and Deputy Project Manager (APC)

Telephone: +201091444779

Address: Al Meks, Dekhela, Alexandria Governorate, Egypt

E-mail: mohamedhamdyabdo@alx-pc.com

Website: www.alex-petroleum.com

Specifically nominated and trained members of staff will record grievance information.

APPENDIX A – 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	Arabic Other (specify) _____					
<table border="1"> <tr> <td rowspan="2">Description of Incident or Grievance:</td> <td>What happened?</td> <td>Who did it happen to?</td> </tr> <tr> <td>Where did it happen?</td> <td>What is the result of the problem?</td> </tr> </table>		Description of Incident or Grievance:	What happened?	Who did it happen to?	Where did it happen?	What is the result of the problem?
Description of Incident or Grievance:	What happened?		Who did it happen to?			
	Where did it happen?	What is the result of the problem?				
<div></div>						
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?						
<div></div>						

Please return this form to Dr. Mohamed Hamdy Tel: +201091444779

E-mail: mohamedhamdyabdo@alx-pc.com

APPENDIX B – Grievance Log

The following template will assist in recording comments, complaints and grievances for monitoring purposes.

Name/Contact Details	Date Received	Details of Compliant/Comment	Responsibility	Actions Taken	Date Resolved