

A background graphic consisting of a series of wavy, overlapping lines in shades of blue and grey, creating a sense of depth and movement. The lines appear to be part of a larger architectural or landscape design, with some lines forming a grid-like structure on the right side.

## Annex 16.4: Stakeholder Engagement Plan

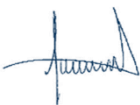


Environmental Impact Assessment (EIA) of the Project:  
CO<sub>2</sub> Storage Unit in Prinos

Date: 02/08/2024

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Project		CO2 Storage Unit in Prinos	
STUDY STAGE	Stakeholder Participation in the context of the Environmental Impact Assessment (EIA)		
CODE STUDY	CCP - 2902		
DATE	25.11.2024		
VERSION	v.01		
REVISION	v.01		
ENV. CONSULTANT	LDK CONSULTANTS A.E. – WSP SA		
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# 1 INTRODUCTION

This document presents the Stakeholder Engagement Plan (SEP) for EnEarth's project to develop a CO2 storage facility in Prinos. The SEP has been developed in accordance with national legislation and regulations as well as the requirements of International Financial Institutions such as Performance Requirement (PR) 10 of the Environmental and Social Policy of the European Bank for Reconstruction and Development (EBRD).

The document is intended to serve as guidance for the development and implementation of the full Stakeholder Engagement Plan (SEP) and the main sub-objectives of the SEP are as follows:

- Contribute to the understanding of stakeholder engagement requirements.
- Preliminary identification, mapping and prioritization of key stakeholders for the Project, including any vulnerable groups (if any).
- Define a technically and culturally appropriate approach to stakeholder engagement, which is essential for the successful management of a Project's environmental and social risks and impacts.
- Ensure that the EIS is supported by adequate resources, supportive institutional structures and adequate procedures.

The EIS is a key supporting document for the Project's Environmental Impact Assessment (EIA), which is being prepared by LDK Consultants in collaboration with WSP and is scheduled to be submitted to the relevant Greek authorities (Ministry of Environment and Energy - MEEE) within 2024.

## 1.1 BRIEF DESCRIPTION OF THE PROJECT

### 1.1.1 Project location

The proposed CO2 storage site is located within the Prinos Basin, in the Gulf of Kavala, in the North Aegean. The existing offshore facilities and the total area of the planned and potential future development of Prinos are located in the Gulf of Kavala, 8 km west of Thassos and 18 km south of the Kavala coastline.

The deposits in this area have been explored since the 1970s, followed by oil production from 3 deposits within the Prinos Concession, as well as natural gas production from the South Kavala Concession, since the 1980s.

The onshore facilities of the proposed CO2 Storage Project are located within the Energean Sigma facilities, within the boundaries of the Municipality of Kavala, approximately 2.4 km east of the settlement of Nea Karvali.

The Figure below presents the satellite image of the project area.

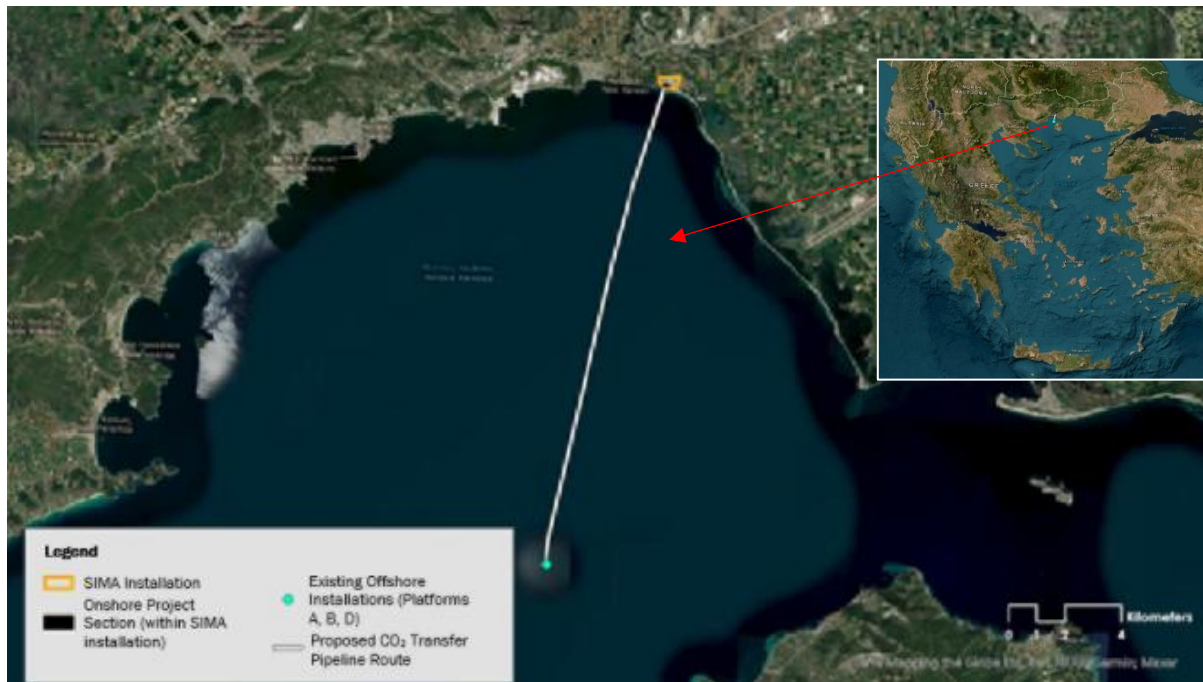
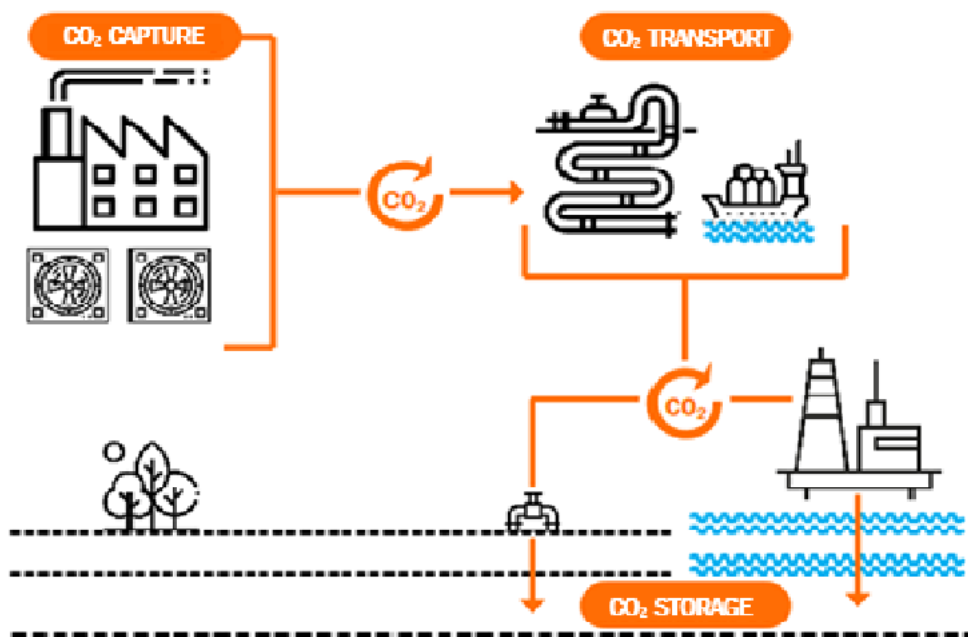


Figure 1–1: Satellite Image of the Project

### 1.1.2 General information for the project

Carbon capture and storage (CCS) refers to the process by which carbon dioxide (CO<sub>2</sub>) emitted from large point sources (such as power plants) is captured, processed and transported to storage sites. Carbon capture and storage technology is a key technology for the transition to a competitive low-carbon economy by 2050 and for mitigating climate change. The main stages of carbon capture, transport and storage are briefly described below:

- CO<sub>2</sub> capture from industrial facilities aims to capture CO<sub>2</sub> from the industrial process and there are several capture technologies.
- Transport: Once captured, the CO<sub>2</sub> is transported to storage sites, located at sea or on land, via pipelines (mainly through the reuse of natural gas pipelines) or, in the case of smaller quantities, via ships, trucks, etc. The supply chain of CO<sub>2</sub> transport from production sources to storage sites requires the development of highly capital-intensive transport infrastructure (pipelines, liquefaction terminals, etc.).
- CO<sub>2</sub> storage: The injection of CO<sub>2</sub> into geological formations or depleted natural gas and oil fields enables the safe and permanent storage of CO<sub>2</sub> underground, thus contributing, to a large extent, to the minimization of the quantities of CO<sub>2</sub> emissions released into the atmosphere by industrial processes.



(Source: Edited from [https://climate.ec.europa.eu/eu-action/carbon-capture-use-and-storage/overview\\_en](https://climate.ec.europa.eu/eu-action/carbon-capture-use-and-storage/overview_en) )

Figure 1-2: Main stages of CO<sub>2</sub> capture and storage

CCS projects are regulated by Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide, as amended by Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC, 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006. The above were incorporated into Greek legislation through Joint Ministerial Decision 48416/2037/2011. In September 2022, Energean obtained an exploration permit for CO<sub>2</sub> storage in Prinos, Kavala, in accordance with European and Greek legislation. The Project is a key part of the Mediterranean CCS Strategic Plan developed by France, Italy and Greece, with the aim of creating the first industrial/commercial CO<sub>2</sub> storage hub in the SE Mediterranean.

The Project is a full-scale CO<sub>2</sub> storage facility at Prinos (the “Project”). The planned CO<sub>2</sub> storage site is located within the Prinos Basin, in the Gulf of Kavala, in the North Aegean. The area of interest for the CO<sub>2</sub> storage is located within the Prinos Concession, where Energean Oil & Gas SA (“Energean”), an affiliate of EnEarth, has held 100% of the interests and management for oil and gas exploration and production activities since 2007. The planned CO<sub>2</sub> storage site is located within the Prinos structure and the underlying aquifer.

The operation of the facility is planned to be developed in two distinct phases based on capacity (Phase 1 and Phase 2), for reasons of scalability and adaptation to market conditions.

- **Phase 1** with an initial nominal capacity of up to **1 MTPA** for 20 years (starting around late 2025 to early 2026). The CO<sub>2</sub> will be supplied primarily in bulk, via a third-party pipeline that will reach the facility boundaries in suitable conditions for injection. In addition, CO<sub>2</sub> parcels will be received in

small quantities at the Sigma onshore facilities, transported by trucks, in the context of pilot CO2 capture projects.

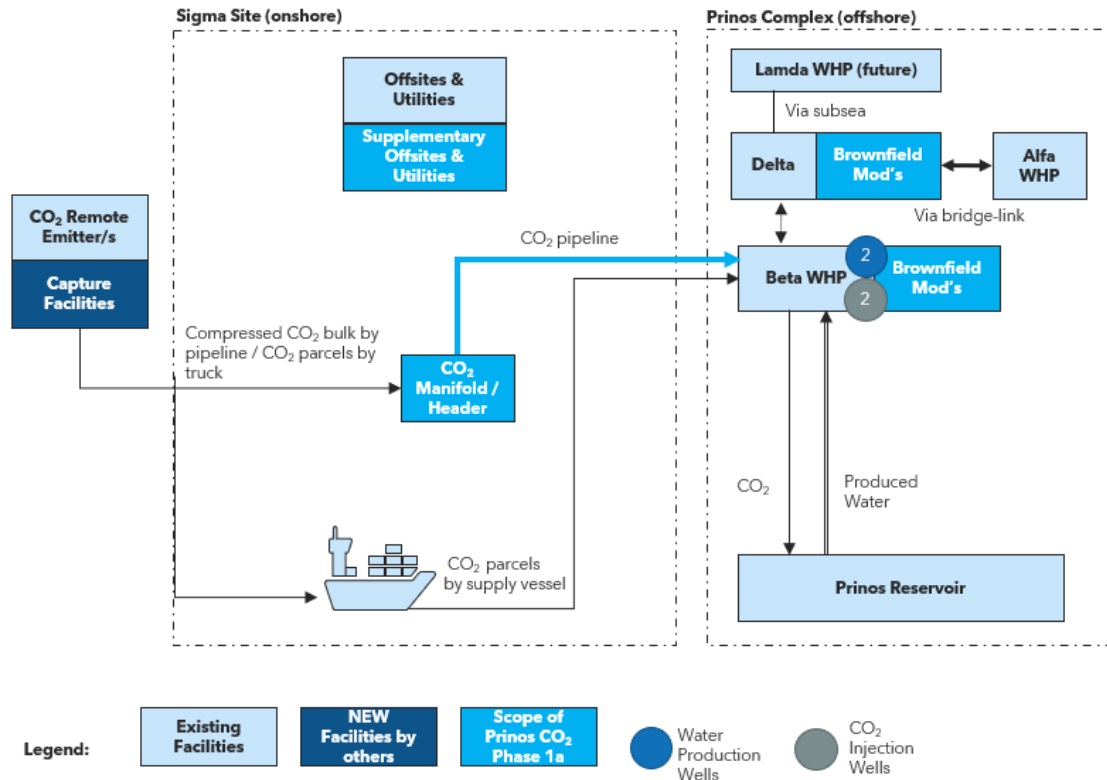


Figure 1–3: Schematic representation of Phase 1 of the Project

- **During Phase 2**, an expansion to the final nominal capacity of up to **3 MTPA** is planned. The facility will be modified to accept additional liquefied CO<sub>2</sub>, which will be received via sea transport to a newly built pier. For this purpose, marine facilities will be constructed for docking, unloading, storage and processing (pumping, heating) of the liquefied CO<sub>2</sub>, within the onshore area of the Sigma plant activities. The CO<sub>2</sub> will be transported to the offshore facilities via the submarine pipeline that will have been constructed within the framework of Phase 1. In order to serve Phase 2, an upgrade of the facilities will be required, as follows:
  - Upgrade/expansion of onshore liquefied CO<sub>2</sub> storage and management facilities, liquefied CO<sub>2</sub> docking and offloading facilities and ancillary facilities.
  - Possible installation of a new platform to cover the maximum capacity of Phase 2.
  - At least four new CO<sub>2</sub> injection wells and four new water production wells.
  - Possible expansion of the water treatment facility.

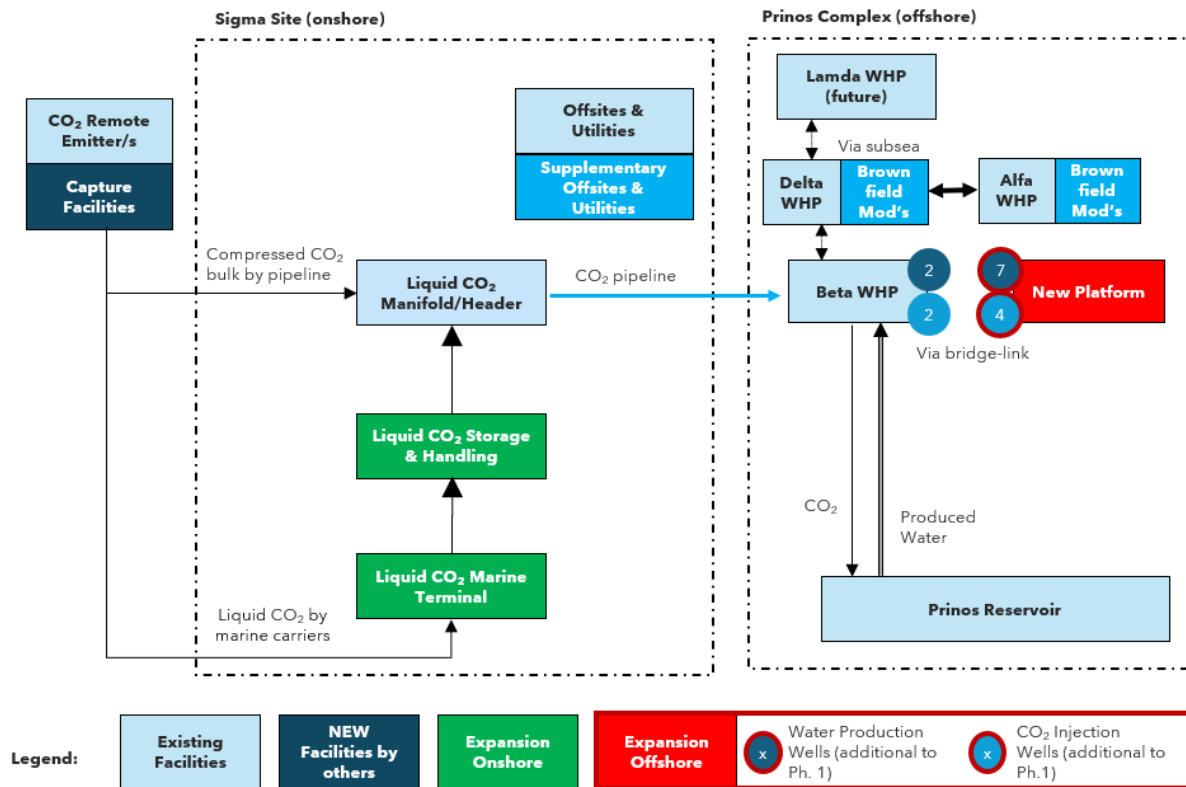


Figure 1-4: Schematic representation of Phase 2 of the Project

This SEP forms an annex to the study focusing on Phase 1 of the Project.

The new facilities and drilling envisaged for the operation of Phase 1 of the CO<sub>2</sub> Storage Project and which are the subject of this study include:

- Onshore facilities:** modification of a certain area within the existing area at the Sigma plant for the construction of the CO<sub>2</sub> reception collector and an unloading and compression area.
- Offshore pipeline:** a subsea pipeline connecting the Sigma plant area to the Beta offshore platform, approximately 20 km long.
- Offshore platforms:** modification and/or use of the existing offshore facilities of Prinos (Beta and Delta platforms) for the reception of CO<sub>2</sub> from the new subsea pipeline and CO<sub>2</sub> cargoes in containers, injection into the new wells, and treatment of the produced water (Delta platform).
- Drilling:** 2 CO<sub>2</sub> injection wells and 2 water production wells on the existing Beta platform of the Prinos offshore complex.

The CO<sub>2</sub> sources and the main reception processes during Phase 1 of the CO<sub>2</sub> Storage Project will be as follows:

- Supply of bulk CO<sub>2</sub> in suitable conditions for injection via a third-party pipeline to an onshore reception station within the Sigma facility area.
- Reception of CO<sub>2</sub> parcels from ISO container trucks at the Sigma onshore facilities. The containers will be loaded onto supply vessels/transport barges by crane, transported and unloaded at the existing Beta

platform of the Prinos offshore facilities. It is noted that there is also provision for direct injection of the CO2 cargoes into the onshore receiving manifold, via a compression station, upon unloading from the trucks.

### 1.1.3 Project Proponent

The Project Proponent (Operator) is EnEarth Greece Single Member S.A. (Address: 32 Kifissias Ave., P.C. 151 25, Maroussi, Telephone: 2108174200). EnEarth is a Greek public limited company established with the primary purpose of developing CO2 storage activities in Greece, and in particular, the development of the Project. EnEarth belongs to the Energean group of companies and is an affiliated company of Energean Oil & Gas S.A., which operates the Prinos, North Prinos and Epsilon fields, in the Gulf of Kavala, which are the only hydrocarbon production sites in the country.

The persons responsible for the EIA, on behalf of the Project Proponent, are:

Vasilis Tsetoglou	HSE Director of ENERGEAN Group
Vasilis Zenios	Head of Facilities Projects - Egypt, Italy, Greece, Croatia, UK
Eleni Chalasti	Junior Process Engineer
Paschalia Kiomourtzi	Subsurface Lead, Greece
Efstathios Skarvelas	Well Delivery Manager
Costas Angelides	Head of Technical Inspection & Energy Projects
Costas Dimotzis	Technical Services Superintendent
Giannis Karagiannis	Environmental Engineer
Katerina Athitsou	Legal Counsel
Theodora Charalambidi	Legal Counsel

Energean, headquartered in London, is a hydrocarbon exploration and production group focused on the sustainable development of the Mediterranean's natural resources, with a focus on natural gas. It is committed to net-zero emissions by 2050 and aims to deliver on the 17 UN Sustainable Development Goals through its daily operations and a wide range of corporate social responsibility initiatives.

The group operates in seven countries in the Mediterranean and the North Sea and has an excellent track record of Health, Safety and Environment in hydrocarbon exploration, development and production, with over 1 billion barrels of oil equivalent in proven and probable reserves, of which approximately 80% is in gas.

Energean Group's production comes from Egypt, Italy, Greece, Croatia and the United Kingdom, exceeding 40,000 barrels of oil equivalent in daily production in 2021 and targeting 200,000 in the medium term.

Energean Group's largest ongoing investment project is the development of the Karish, North Karish and Tanin fields in Israel. The three fields have approximately 100 billion cubic meters of natural gas. At the same time, three other major hydrocarbon development programs are underway in Egypt, Italy and Greece. Its total ongoing investments are in the order of \$3 billion.

In Greece, Energean operates the Prinos, North Prinos and Epsilon fields in the Gulf of Kavala, which provide the country's only hydrocarbon production. Given market conditions, Energean has implemented a



restructuring and modernization program for Prinos, with the aim of gradually reducing its dependence on oil price fluctuations and further reducing its environmental footprint through carbon dioxide (CO<sub>2</sub>) storage.

In the context of the execution of petroleum operations (exploration and exploitation) within the Prinos Exploitation Area (as defined in the Agreement of 23.11.1999 of Law 2779/1999 as amended and in force) for several years, Energean has collected geological, geophysical and drilling data for the Prinos geological basin and in particular for the Prinos and Epsilon structures, from which it is documented that the specific structures are in principle eligible as CO<sub>2</sub> storage sites. Consequently, within the context of its activities in the area, Energean proceeded with the design and licensing maturation of a CO<sub>2</sub> Storage Unit in Prinos, making use of no. 173 of Law 4964/2022. More specifically, according to Law 4964/2022 (Government Gazette A 150/30.07.2022) entitled "Provisions for the simplification of environmental licensing, establishment of a framework for the development of Offshore Wind Farms, addressing the energy crisis, environmental protection and other provisions", and more specifically based on art. 173 thereof, the entities to which the Greek State has granted (according to Law 2289/1995 (A' 27)) the right or permit to explore and exploit hydrocarbons in a specific area, and which have sufficient data (in particular geological, geophysical and drilling) to document the eligibility in principle as a carbon dioxide (CO<sub>2</sub>) storage site, of a geological formation or formations located in the subsoil of the granted area (onshore or offshore), acquire (under the conditions of the said article) the right to continue and complete the exploration process of the specific area in order to determine its suitability for CO<sub>2</sub> storage.

Based on the above, Energean requested from HEREMA on 31.08.2022 the activation of the right to continue and complete the investigation of the structures of the Prinos, Epsilon fields and the underlying aquifer (the "Area") in order to determine their suitability as CO<sub>2</sub> storage sites. The said application was accepted with the Decision to Activate the Right to Explore for CO<sub>2</sub> Storage (as approved by the decision of the Hellenic Energy and Natural Resources Development Authority (EGD) No. 14577/29.09.2022 (Government Gazette 5247/B/11.10.2022)), which approved the in-principle eligibility of the storage site, which is located within the boundaries of the Prinos concession and includes the structures of the Prinos, Epsilon fields and the underlying aquifer, as well as approved the continuation and completion of the exploration of the Area as a storage site for a period of twenty-two (22) months starting from October 1, 2022 by Energean.

According to par. 5 of art. 173 of L. 4964/2022, after the completion of the suitability investigation and before the expiration of the right to complete the investigation, the interested entity submits an application to EDEYEP, in order to determine the suitability of the geological formation as a CO<sub>2</sub> storage site and to activate the storage right of the entity. An interested entity is understood to be either the entity with the right to continue and complete the investigation (in this case Energean), or an affiliated company, which has as its exclusive purpose the activity of CO<sub>2</sub> storage (in this case EnEarth).

With the progress and completion of the exploration procedures of the Area as a CO<sub>2</sub> storage site, EnEarth, as an affiliated company of Energean, submitted on 30.06.2024 an application in order to determine the suitability of the geological formation as a CO<sub>2</sub> storage site and to activate the storage right of the entity in accordance with par. 5 of article 173 of Law 4964/2022. Energean, as the entity with the right to continue and complete the exploration, has co-signed the above application.

Furthermore, in accordance with par. 5, letter e of article 173 of Law 4964/2022, facilities used by the operator to serve the activity of hydrocarbon exploration and exploitation may be used in the context of the CO2 storage activity. EnEarth and Energean have included in the above application a detailed description of the facilities (existing and new) that are to be used for the needs of the CO2 storage activity.

Following the issuance of the decision establishing the suitability of the geological formation as a CO2 storage site and the activation of EnEarth's storage right in accordance with par. 5 of article 173 of Law 4964/2022, Energean will grant to EnEarth those facilities (onshore and offshore) from the existing facilities that are necessary for the development of the CO2 storage activity. At the same time, Energean will provide technical support to EnEarth through its human resources.

## 1.2 ENVIRONMENTAL CATEGORY OF THE PROJECT

According to Ministerial Decision DIPA/37674/10-8-2016, as amended by MD 2307/2018 and MD YPEN/DIPA/ 17185/1069/2022 (Government Gazette 841/B` 24.2.2022), currently in force, the Project falls under Category 11 "Transport of energy, fuels and chemicals", no. 6 "Infrastructure for the transport and storage of carbon dioxide streams in geological formations, in application of Directive 2009/31/EC:

- Transport pipelines, including associated compressor stations,
- Storage sites
- Capture facilities for the purpose of storage in geological formations

and is classified under Subcategory A1.

Subcategory A1 includes projects that may have significant impacts on the environment, and therefore:

- A detailed Environmental Impact Assessment (EIA) is required in accordance with the specifications set out in Annex 2 of Joint Ministerial Decision 170225/2014.
- The competent authority for issuing the permit is the Ministry of Environment and Energy (MEE) and specifically the Directorate of Environmental Licensing (DIPA) in accordance with Law 4014/2011.
- The licensing procedure for a subcategory A1 project is defined in Article 3 of Law 4014/2011.
- The consultation principles during the EIA process are defined in Joint Ministerial Decision 1649/45/2014 "Specification of the procedures for opinions and the manner of informing the public and participating in the public consultation during the environmental licensing of projects and activities of Category A of the decision of the Ministry of Environment, Forestry and Climate Change No. 1958/2012 (Government Gazette 21/A), in accordance with the provisions of article 19 paragraph 9 of Law 4014/2011 (Government Gazette 209/A), as well as any other relevant details".
- The EIA will include forms T and Y, which define the identity of the activity subject to environmental licensing, as well as information regarding the environmental licensing activity in accordance with Decree-Law 167563 (Government Gazette 964/B/19-04-2013) "Specification of the procedures and special criteria for the environmental licensing of projects and activities of articles 3, 4, 5, 6



and 7 of Law 4014/2011, as defined in article 2, paragraph 13, the special forms of the above-mentioned procedures, as well as any other matter related to these procedures”.

The environmental licensing procedure of the Project is determined by Law 4014/2011, as amended by Law 4685/2020 “Modernization of environmental legislation, incorporation into Greek legislation of Directives 2018/844 and 2019/692 of the European Parliament and of the Council and other provisions” (Government Gazette 92/A/7.5.2020). The content and level of detail of the Environmental Impact Assessment are specified in Joint Ministerial Decision (JMD) 170225/2014.

### **1.3 PURPOSE AND OBJECTIVES OF STAKEHOLDER PARTICIPATION**

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Stakeholder engagement plays a key role in building strong, constructive and flexible relationships with stakeholders. In this context, the primary objective of stakeholder engagement is to communicate the Project and its impact and to gather stakeholder views with a view to improving Project decision-making and building understanding through the active participation of individuals, groups and organisations in the Project.

The objective of the stakeholder participation plan is to identify and map all potentially affected groups and individuals and to outline the strategy for informing, consulting, engaging and engaging with the identified stakeholders. The stakeholder participation plan aims to contribute to:

- facilitating access to information and achieving appropriate disclosure of information
- ensuring the accuracy of information about the Project
- early identification of issues that may endanger the Project or its stakeholders and the successful management of the Project’s environmental and social risks and impacts
- establishing a substantial system of long-term communication and feedback exchange between the Project and its stakeholders
- designing a mechanism for addressing and resolving complaints or concerns related to the Project

The figure below illustrates the processes involved in the development and implementation of the stakeholder participation plan:

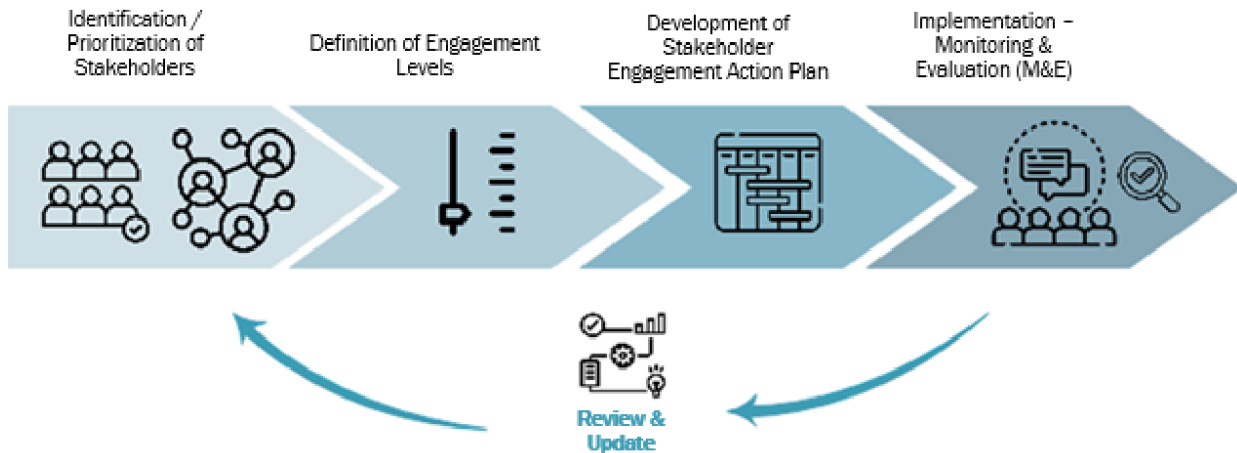


Figure 1-5: Process for Developing and Implementing a SEP

The proposed SEP is a preliminary framework, which outlines the basic principles of engagement, the identification, description and prioritization of stakeholders, a preliminary set of tools and communication channels to achieve the planned level of engagement and an initial Stakeholder Engagement Action Plan. A Comprehensive SEP will be developed for the Project in accordance with applicable legislation, and EBRD Performance Requirement 10 and will be included in the EIA, so that it can be further developed and maintained in subsequent phases of the Project. The comprehensive SEP should include:

- The principles and objectives for stakeholder engagement.
- The key regulatory requirements for stakeholder engagement.
- The existing engagement and available engagement mechanisms that already exist and can be used.
- An updated stakeholder list and thorough analysis. The analysis should allow for the identification of how and to what extent stakeholders (1) are affected, or are likely to be affected, (directly or indirectly) by the Project, or (2) may have an interest in and/or influence the Project; the analysis should also allow for a clear understanding of the characteristics and needs of stakeholders, as well as the structure of their relationships.
- A stakeholder hierarchy to help determine the most appropriate engagement approach, identify the resources that will be needed and target them effectively.
- Preliminary Stakeholder Engagement Plan, both in the construction and operational phases - which will describe at least the form of engagement, the timing and frequency of activities, the information to be communicated/content of engagement, the resources to be allocated for the implementation of the stakeholder engagement plan, the manner in which engagement activities will be communicated, the manner in which comments/feedback will be taken into account.
- Description of a functioning Grievance Mechanism.
- Monitoring and reporting arrangements to assess the effectiveness of stakeholder engagement and guide the adaptation and revisions of the SEP.
- Relevant institutional arrangements, indicative resources and responsibilities for the implementation of the SEP, as well as oversight arrangements.

It is important to note that the SEP is a dynamic document and should be reviewed regularly throughout the life of the Project. Reviews will examine the situation as it evolves, as well as the results of stakeholder activities already undertaken in order to make necessary updates to the Plan.

## 2 REGULATORY FRAMEWORK FOR STAKEHOLDER PARTICIPATION

### 2.1 NATIONAL AND EU REGULATORY FRAMEWORK

Stakeholder Participation for the Project will be carried out in accordance with the requirements of applicable national and EU legislation which is summarized as follows:

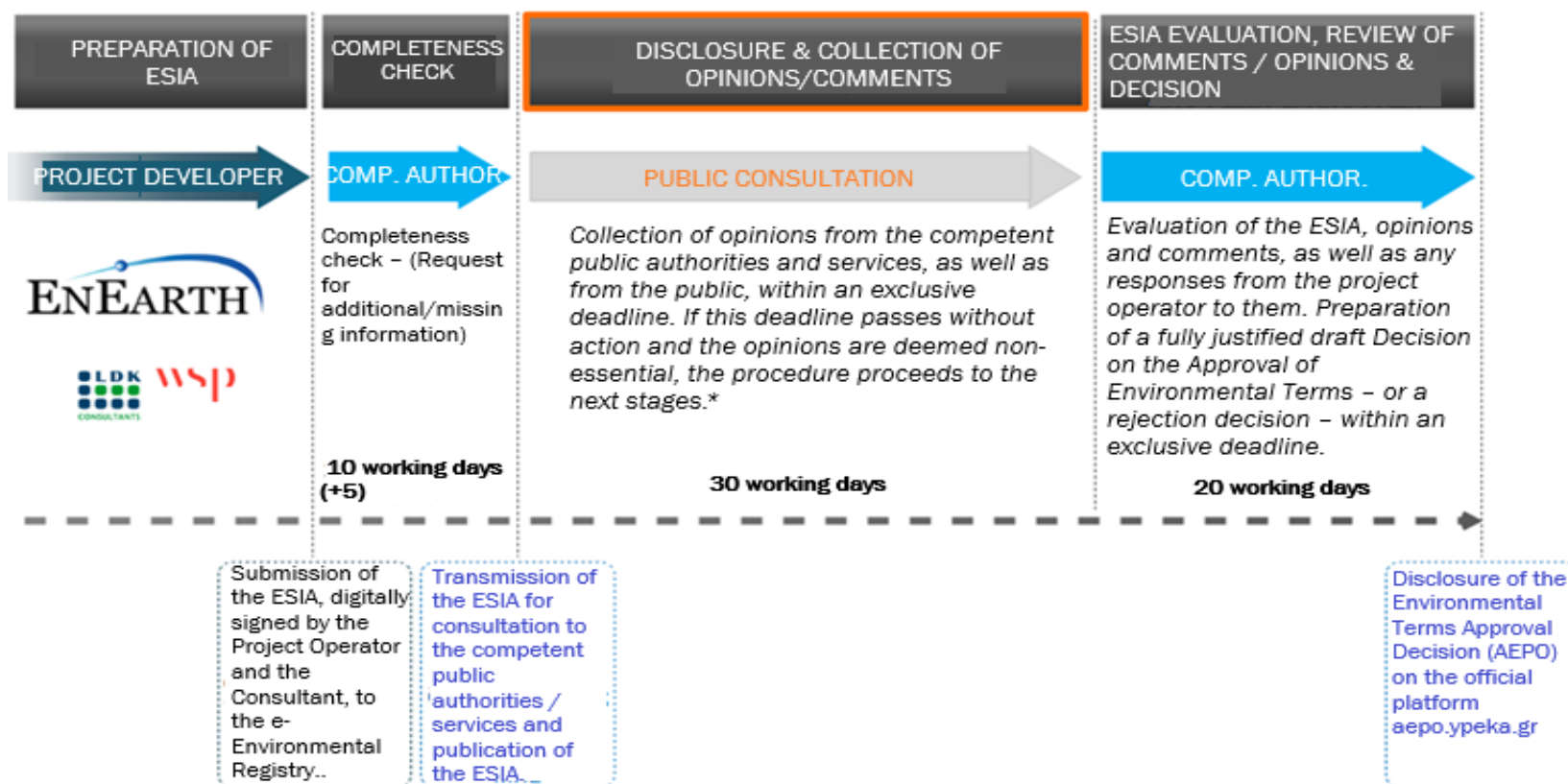
**Table 2-1: Relevant National and Union Legislation**

Serial Number of Legislation & Official Gazette	Legislation
Regulation (EC) No 1367/2006	Regulation (EC) No 1367/2006 of the European Parliament and of the Council of 6 September 2006 on the application of the provisions of the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters to Community institutions and bodies of 6 September 2006.
Directive 2003/35/EC Directive 2014/52/EU	<ul style="list-style-type: none"> <li>• Directive 2003/35/EC of the European Parliament and of the Council of 26 May 2003 on public participation in respect of the drawing up of certain plans and programmes relating to the environment and amending, as regards public participation and access to justice, Council Directives 85/337/EEC and 96/61/EC.</li> <li>• Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 (EIA Directive) amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.</li> </ul>
Law 3422/2005 (Government Gazette 303/A 13.12.2005)	Law 3422/2005 on the ratification of the Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters.
Y.A.I.P. 11764/653/2006 (Government Gazette 327/B 17.3.2006)	11764/653/2006 on public access to environmental information held by public authorities, in compliance with the provisions of Council Directive 2003/4/EC "on public access to environmental information and repealing Directive 90/313/EEC". Replacement of Joint Ministerial Decision No. 77921/1440/95 (795/B).

<p>Law 4014/2011 (Government Gazette 209/A 21.9.2011)</p> <p>Ministry of Housing and Urban Development No. 48963/2012 (Government Gazette 2703/B` 5.10.2012)</p> <p>Ministry of Housing and Urban Development No. 167563/EYPE/2013 (Government Gazette 964/B 19.4.2013)</p> <p>Ministry of Housing and Urban Development No. 1649/45/2014 (Government Gazette 45/B 14.1.2014)</p> <p>Ministry of Housing and Urban Development No. 170225/2014 (Government Gazette 135/B 27.1.2014)</p> <p>Ministry of Housing and Urban Development No. 1915/2018 (Government Gazette 304/B 2.2.2018) ,</p> <p>Law. 4685/2020 (Government Gazette 92/A 07.05.2020)</p>	<ul style="list-style-type: none"> <li>• Law 4014/2011, as amended and in force, on the environmental licensing of projects and activities, regulation of arbitrary measures in connection with the creation of an environmental balance and other provisions of the Ministry of Environment's competence.</li> <li>• Ministerial Decree no. 48963/2012 Specifications for the content of Environmental Terms Approval Decisions (AEPO) for category A projects and activities of the decision no. 1598/13.1.12 of the Minister of Environment, Energy and Climate Change (21/B), as in force in accordance with article 2 §7 of Law 4014/11 (209/A).</li> <li>• Ministerial Decree no. Εικ.: 167563/ΕΥΠΕ/2013, as amended and in force, for the specification of the procedures and the more specific criteria for environmental licensing of projects and activities of articles 3, 4, 5, 6 and 7 of Law 4014/2011, in accordance with the provisions of article 2 paragraph 13 thereof, the special forms of the above procedures, as well as any other matter related to these procedures.</li> <li>• M.A. Εικ. 1649/45/2014 for the specification of the procedures for opinions and the manner of informing the public and participating in the public consultation during the environmental licensing of projects and activities of Category A of the decision of the Minister of Environment, Energy and Climate Change no. 1958/2012 (Government Gazette 21/A), in accordance with the provisions of article 19 paragraph 9 of law 4014/2011 (Government Gazette 209/A), as well as any other relevant details.</li> <li>• Ministerial Decree no. 170225/2014, as amended and in force, for the specification of the contents of the environmental licensing files for Category A projects and activities of the decision of the Minister of Environment, Energy and Climate Change with no. 1958/2012 (21/B) as in force, in accordance with article 11 of law 4014/2011 (209/A), as well as any other relevant details.</li> <li>• Ministerial Decree no. 1915/2018 for the amendment of no. 48963/2012 (B' 2703) of joint ministerial decision, no. 167563/2013 (B' 964) of joint ministerial decision and no. 170225/2014 (B' 135) of ministerial decision, which have been issued under the authorization of Law 4014/2011 (A' 209), in compliance with Directive 2014/52/EU "amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment" of the European Parliament and of the Council of 16 April 2014.</li> <li>• Law 4685/2020, as amended and in force, for the modernization of environmental legislation, incorporation into Greek legislation of</li> </ul>
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Serial Number of Legislation & Official Gazette	Legislation
	Directives 2018/844 and 2019/692 of the European Parliament and of the Council and other provisions.

Below are presented the basic steps of the procedure for issuing a Decision for the Approval of Environmental Terms (AEPO), including the Public Consultation requirement, in accordance with Law 4014/2011, as amended and applicable to projects and activities of subcategory A1, without submitting a Preliminary Determination of Environmental Requirements (PDER) file.



\*Essential (substantive, material), in the context of assessing the environmental impacts of a project or activity, are considered the opinions of public authorities whose area of competence is directly related to the characteristics of the proposed project and its potential environmental impacts.

Figure 2-1: Procedure for Issuing Env. Terms (Subcategory A1 projects, without submission of a PDER file)

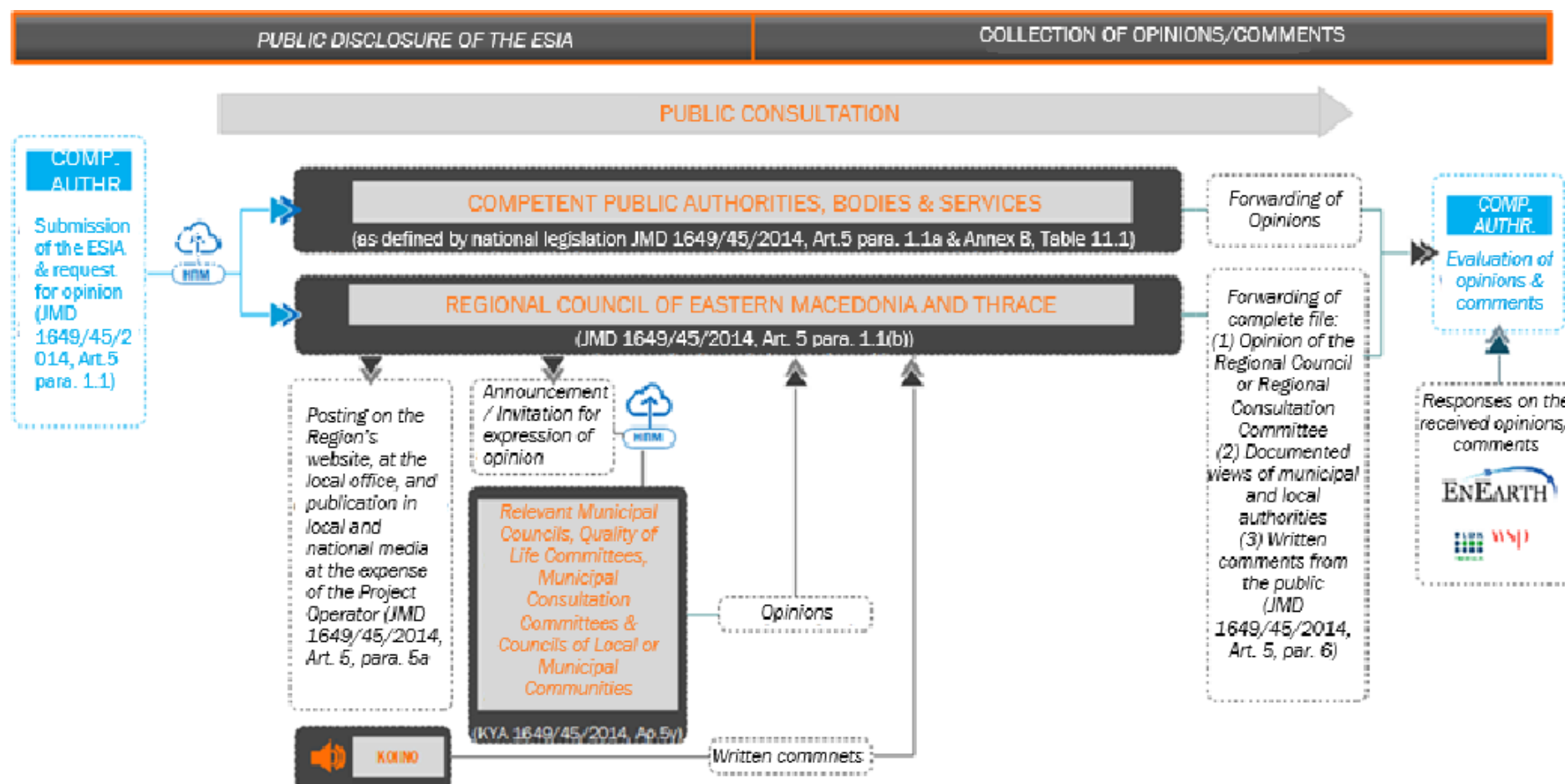


Figure 2-2: Disclosure and Consultation Procedure (Subcategory A1 Projects, without submission of a PDER file)



## 2.2 REQUIREMENTS OF INTERNATIONAL FINANCIAL INSTITUTIONS

### 2.2.1 European Bank for Reconstruction and Development (EBRD)

The Project may seek international financing and the EBRD is considered as a potential financier. As a result, the CIP will follow the EBRD's standards. The EBRD is committed to promoting "environmentally responsible and sustainable development". To this end, the EBRD has established a comprehensive set of Performance Requirements for key areas of environmental and social sustainability that projects are required to meet (EBRD Environmental and Social Policy 2019) including Performance Requirement 1: Assessment and management of environmental and social risks and impacts and Performance Requirement 10: Disclosure of information and stakeholder engagement.

The key elements of these Performance Requirements are summarised below:

**Table 2-2: Key Performance Requirements 1 & 10**

Performance Requirement 1	Performance Requirement 10
Identification and assessment of adverse and beneficial environmental and social impacts and issues related to the Project.	Identification of Project stakeholders who are affected or likely to be affected by the Project, including disadvantaged or vulnerable groups who may be differently or disproportionately affected by the Project.
Adoption of measures to avoid or, where avoidance is not possible, minimize, mitigate or compensate for adverse impacts on employees, affected communities and the environment.	<p>Ensure information disclosure and meaningful consultation throughout the life of the Project so that stakeholders are appropriately involved in consultation on environmental and social issues that could potentially affect them.</p> <p>Provide relevant information, guidance and training to workers and communities affected by the Project on health and safety risks, protective and preventive measures.</p>
Identifying and, whenever possible, exploiting opportunities to improve environmental and social performance.	Establish a Grievance Mechanism to receive and facilitate the resolution of stakeholder concerns and complaints regarding the Project
Promoting improved environmental and social performance through a dynamic performance monitoring and evaluation process.	Providing stakeholders, on an ongoing basis, with appropriate information regarding the Project's environmental and social performance, risks, impacts and complaints arising in relation to the Project. Monitoring any changes to the Project and updating the SEP accordingly.

### 2.2.2 Other financial institutions

In addition to the EBRD, other international financial institutions now recognize stakeholder engagement as an essential element of good business practice and corporate responsibility, as well as a means of improving project quality. In particular, meaningful public engagement is recognized as a key factor in successfully managing risks and impacts for project-affected communities and achieving improved benefits for society

as a whole. The approaches adopted by major organizations that constitute good practices, which the Project's SEP incorporates to varying degrees, are summarized below.

The World Bank Environmental and Social Framework is the World Bank's commitment to sustainable development, through a specific Policy and a set of Environmental and Social Standards (ESS). Projects supported by the Bank are required to meet these Environmental and Social Standards, including Environmental and Social Standards 10: Stakeholder Participation and Disclosure of Information.

In summary, ESP 10 requires:

- Establishing a systematic approach to stakeholder engagement that allows for the identification of stakeholders, the establishment and maintenance of a constructive relationship with them, in particular with those affected by the project.
- Assessing the level of stakeholder interest and support for the project and providing opportunities for their views to be taken into account in the project design and its environmental and social performance.
- Supporting effective and inclusive participation of stakeholders affected by the project throughout the project life cycle.
- Ensuring the dissemination of information on the project's environmental and social risks and impacts in a timely, clear, easily understandable and accessible manner.
- The development of an accessible and inclusive mechanism that allows project-affected parties to raise issues and complaints and for funders to address and manage these issues and complaints.

The United Nations Development Programme Social and Environmental Standards (UNDP Social and Environmental Standards) ensure, among other things, the meaningful, effective and informed participation of stakeholders in the design and implementation of programmes and projects. Stakeholder engagement is required to be a continuous process that may include, to varying degrees, the following elements: stakeholder analysis, disclosure and dissemination of information, consultation and meaningful participation, dispute resolution and redress procedures, and ongoing reporting to affected communities and other stakeholders. The stakeholder engagement process is required to take due account of the gender dimension and be conducted in a culturally sensitive, non-discriminatory and inclusive manner, ensuring that potentially affected vulnerable and marginalised groups are identified and provided with opportunities to participate.

## 2.3 STANDARDS AND POLICIES

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EnEarth is part of the Energean group of companies, which seeks to implement the 17 United Nations (UN) Sustainable Development Goals through its daily operations and a wide range of corporate social responsibility actions. The participation of local communities is an integral part of Energean's corporate and social responsibility policy and cooperation with the communities in which it operates is at the forefront of Energean's corporate values. In this context, it has a "Health, Safety, Environmental & Social Responsibility Policy" which, among other things, aims to ensure cooperation with local communities and other stakeholders in a responsible and transparent manner and a "Code of Ethics" which is guided by Energean's core values, which include interacting with local communities to meet their expectations and needs.

## 3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

### 3.1 APPROACH TO IDENTIFYING AND PRIORITIZING STAKEHOLDERS

The objective of the stakeholder identification and prioritization process is to establish an initial list of organizations and individuals who may be directly or indirectly affected (positively or negatively/permanently or temporarily), have an interest in and/or influence the Project, including groups that may be differently affected or disproportionately affected due to their disadvantaged or vulnerable status.

The selection of stakeholders and their analysis will contribute to their prioritization, ensuring that the appropriate level of involvement is determined for each stakeholder; it will also contribute to defining the key parameters for engagement, including time, place and method of engagement.

Stakeholder prioritization involves the analysis of stakeholders based on selected parameters and characteristics to develop appropriate stakeholder management plans and effectively support stakeholder management and engagement objectives.

While there are many models reflecting different approaches, for this Project the characteristics of impact on interests and influence on Project results were chosen to enable a better understanding of the following:

- How and to what extent the interests of stakeholders are expected to be affected by the Project.
- How different stakeholders can influence the Project and the risks or opportunities associated with it.
- The most appropriate degree and manner of involvement.
- The stakeholders identified are classified into three main categories based on their expected involvement in Project activities as follows:
  - Key stakeholders: Stakeholders whose interests are likely to be directly affected by the Project and who can exert significant influence to influence it.
  - Potentially active (secondary) stakeholders: Stakeholders who are likely to be affected by the Project and/or who may experience indirect impacts.
  - Other stakeholders: Stakeholders who are likely to express their views and/or concerns, but are not likely to experience any impact from the Project or influence the Project.

The level of participation takes into account the above hierarchy and the purpose of the participation (type of relationship/intended outcome). Four levels of participation are identified: information, advice, active participation and cooperation. Each level of participation is linked to a broadly defined purpose, as presented below.

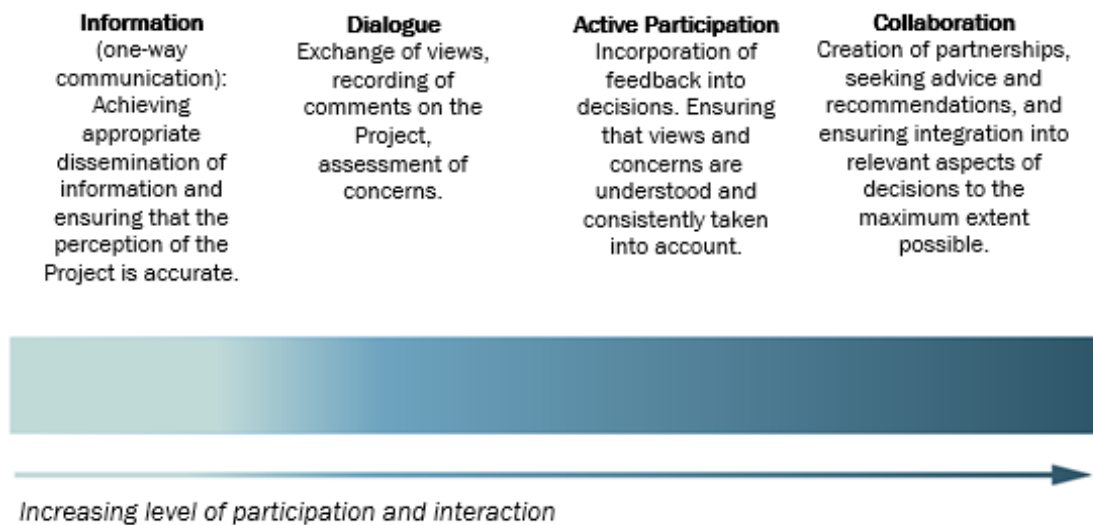


Figure 3-1: Purpose of participation

The following Table is used to guide the prioritization and corresponding determination of participation levels:

Table 3-1: Stakeholder Hierarchy Table

Impact on Stakeholders			
	High	Medium	Low
	Low	Medium	High
	Influence on the Project		
Impact on Stakeholders	High	<ul style="list-style-type: none"> <li>Information</li> <li>Dialogue</li> <li>Active participation</li> </ul>	<ul style="list-style-type: none"> <li>Information</li> <li>Dialogue</li> <li>Active participation</li> <li>Collaboration</li> </ul>
	Medium	<ul style="list-style-type: none"> <li>Information</li> <li>Dialogue as needed</li> <li>Active participation as needed</li> </ul>	<ul style="list-style-type: none"> <li>Information</li> <li>Dialogue</li> <li>Active participation</li> <li>Collaboration as needed</li> </ul>
	Low	<ul style="list-style-type: none"> <li>Information</li> <li>Dialogue as needed</li> <li>Active participation as needed</li> </ul>	<ul style="list-style-type: none"> <li>Information</li> <li>Dialogue</li> <li>Active participation as needed</li> <li>Collaboration as needed</li> </ul>

## Legend

Key stakeholders
Potentially Active Stakeholders
Other Stakeholders

As the Project progresses through its various phases, the process of identifying stakeholders and prioritizing them will become more of a review process and the initial list drawn up will be updated.

## 3.2 PRELIMINARY IDENTIFICATION AND PRIORITIZATION OF STAKEHOLDERS



The identification and analysis of stakeholder groups is crucial for the project objectives and for the selection of appropriate participation mechanisms. The main stakeholder groups are presented in the table below. During the implementation of the project, this list may be further clarified and modified.

To prioritize stakeholders, stakeholder influence relationships are illustrated. Stakeholder influence relationships allow for a better understanding of the following issues:



- who is affected by the project and how
- how different stakeholders can influence the project and what risks or opportunities for the project this influence is associated with

Table 3–2: Project stakeholders

<b>Legend:</b>	
	High
	Medium
	Low

Group	Stakeholder	Description of potential impact on interests/influence	Impacts	Influence
National Authorities and Bodies	<ul style="list-style-type: none"> <li>Ministry of Environment and Energy</li> <li>Ministry of Labor and Social Security</li> <li>Ministry of Culture (includes Archaeology and Cultural Heritage)</li> <li>Ministry of Rural Development and Food (General Directorate of Fisheries)</li> <li>Ministry of Tourism</li> <li>Natural Environment and Climate Change Organization (OFYPEKA) - Management Unit of Nestos, Vistonida and Rodopi National Parks</li> <li>Other competent national bodies and services as defined by national legislation for environmental licensing.</li> </ul>	<ul style="list-style-type: none"> <li>Prominent role in the project with direct influence/impact through project decision-making, regulatory and permitting controls, etc.</li> <li>If their views/concerns are not taken into account, they may take actions that may jeopardize the Project</li> </ul>		

Group	Stakeholder	Description of potential Impact on interests/Influence	Impacts	Influence
Regional and Local Authorities	<ul style="list-style-type: none"> <li>Decentralized Administration of Macedonia-Thrace (Directorate of Civil Protection, Department of Civil Defense (PAM) – Civil Emergency Planning (PSEA), Directorate of Environment and Spatial Planning of Eastern Macedonia – Thrace, Directorate of Waters of Eastern Macedonia – Thrace, Directorate of Rural Affairs of Eastern Macedonia-Thrace</li> <li>Region of Eastern Macedonia and Thrace</li> <li>Regional unit of Kavala</li> <li>Municipal Councils of the municipalities of Kavala, Nestos, Pangaio and Thassos and relevant municipal departments (e.g. Directorate of Technical Services)</li> <li>Coast Guard - Hellenic Coast Guard (2nd Regional Administration)</li> <li>Fire Department (Regional Fire Department of Eastern Macedonia and Thrace, Kavala Fire Service)</li> <li>Ephorate of Underwater Antiquities, Ephorate of Antiquities of Kavala, Service of Modern Monuments and TW of EM&amp;T</li> </ul>	<ul style="list-style-type: none"> <li>Direct influence/impact on the Project through regulatory enforcement.</li> <li>Interest in the Project's impact on local safety, emergency planning, accident prevention, etc.</li> <li>If their views/concerns are not taken into account, they may take actions that could jeopardize the Project</li> </ul>		





<p>Local Population, Local Businesses and Professionals</p>	<ul style="list-style-type: none"> <li>Residents of the municipalities of Kavala, Nestos, Pangaio and Thassos</li> <li>Residents of the Region of Eastern Macedonia and Thrace</li> <li>Hospitality and retail businesses in the area</li> <li>Local fishermen</li> <li>Local businesses active in the construction sector</li> <li>Professional associations (fishing, aquaculture, tourism, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Population living near the Project sites and related infrastructure, including local entrepreneurs</li> <li>Residents of communities located near the roads used for the transport of materials during construction</li> <li>Residents of the municipalities with wider economic interests linked to the project activities (e.g. employment, suppliers, etc.)</li> <li>This group has a high interest in the Project, as the majority of the population of the Kavala Bay area resides in the city of Kavala and the neighboring coastal suburbs and villages as well as on the island of Thassos and is likely to be affected by the Project.</li> <li>Fishermen are the main users of the sea. Their interest in the Project is high as their only source of income comes from the use of the sea.</li> </ul>		
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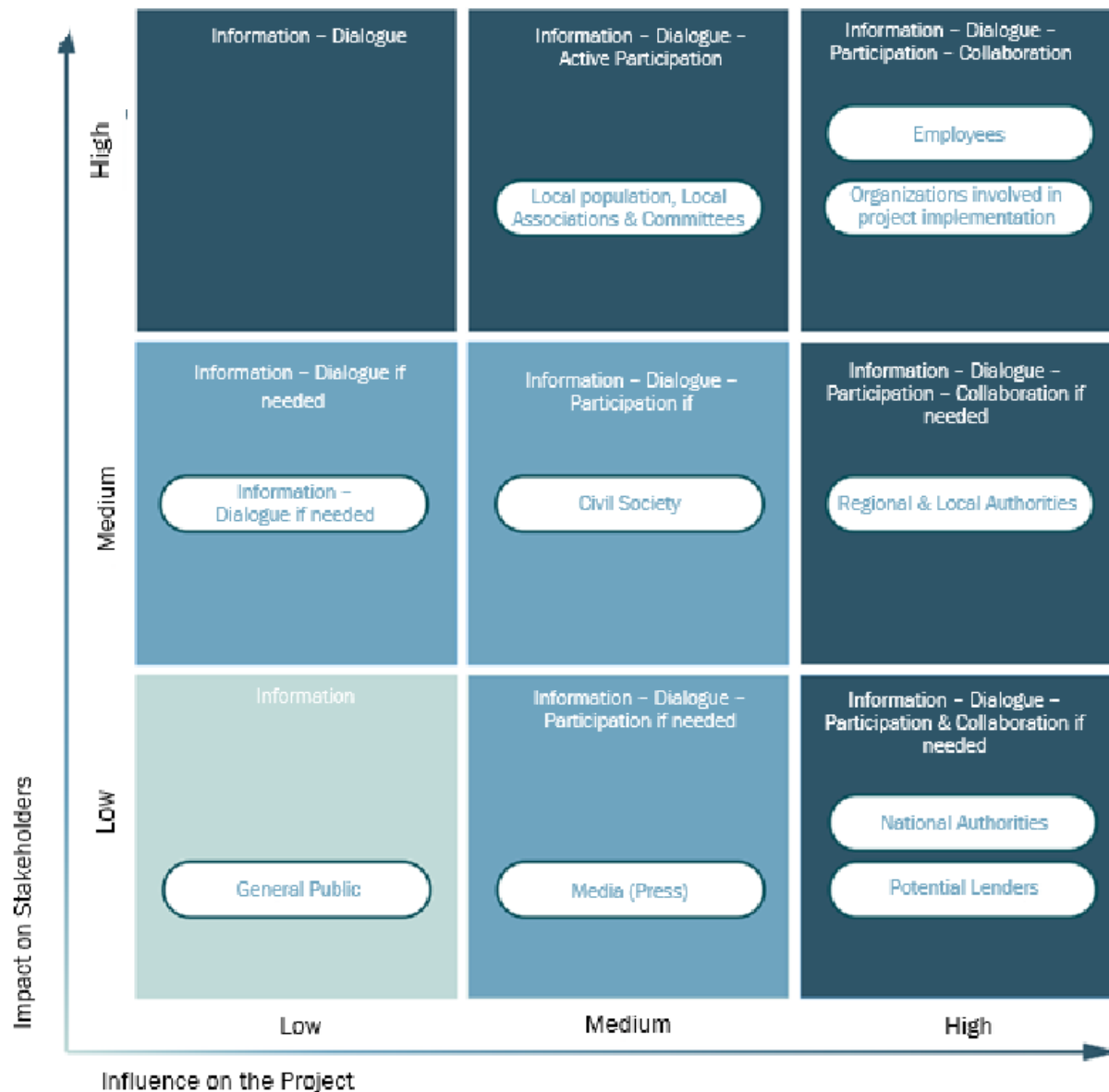


Group	Stakeholder	Description of potential Impact on interests/Influence	Impacts	Influence
Vulnerable groups	<ul style="list-style-type: none"> <li>Vulnerable groups refer to individuals who, due to gender identity, ethnicity, age, disability, economic disadvantage or social status, may be more adversely affected by the impacts of the project than others and who may be limited in their ability to claim or benefit from the project's benefits.</li> <li>Such individuals within the context of the Project are categorized as: <ul style="list-style-type: none"> <li>Those living below the poverty line</li> <li>Single-parent households</li> <li>Households with members with disabilities</li> <li>Elderly</li> <li>Children</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>At this stage, no vulnerable group has been identified as potentially affected by the Project.</li> </ul>	-	-
Employees	<ul style="list-style-type: none"> <li>Employees employed by EnEarth</li> </ul>	<ul style="list-style-type: none"> <li>The involvement and participation of employees in the implementation of the Project is important for the implementation of the Project Interest in employment</li> <li>Employee rights and working conditions</li> <li>Possible collective mobilizations may negatively affect the implementation schedule of the Project</li> </ul>	■	■

Group	Stakeholder	Description of potential Impact on interests/Influence	Impacts	Influence
Private sector organizations involved in the Project Implementation	<ul style="list-style-type: none"> <li>Contractors, subcontractors, suppliers and their personnel</li> </ul>	<ul style="list-style-type: none"> <li>Contractors and subcontractors will be involved in the activities to implement the project, as well as ensuring compliance with labor rights and working conditions standards.</li> <li>They are directly involved in the development of each location and have a direct interest in its success</li> <li>They are interested in labor rights, working conditions, health and safety.</li> </ul>	■	■
Media	<ul style="list-style-type: none"> <li>International, national and local media including Print, Radio, Television, Online media (social media, websites, blogs, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Cover news related to the project on an ongoing basis</li> <li>Inform the public and individual groups about key aspects of the Project</li> <li>Have the ability to exert influence by acting as information transmitters, allowing for the outreach of wider audiences.</li> </ul>	■	■

Group	Stakeholder	Description of potential Impact on interests/Influence	Impacts	Influence
Civil Society	<ul style="list-style-type: none"> <li>Non-Governmental Organizations (NGOs) e.g. Society for the Protection of Nature and Eco-Development, Ecological Movement of Kavala, Greenpeace Greece, WWF Greece, Hellenic Ornithological Society and other possible national and international NGOs that may be interested in the Project</li> <li>Think Tanks e.g. Institute of Energy of South-East Europe (IENE), The Hellenic Association for Energy Economics (HAEE)</li> <li>Professional organizations. Indicatively, these may include the Technical Chamber of Greece/Regional Department of Eastern Macedonia, Chamber of Commerce and Industry of Kavala, Labor Center of Kavala Prefecture, etc.)</li> <li>Other organizations of the Civil Service (e.g. Nautical Club of Kavala, the Kavala Water Sports Club)</li> </ul>	<ul style="list-style-type: none"> <li>Interest in environmental and social issues</li> <li>They can act as information relay agents to disseminate information about the Project</li> <li>Professional organizations may have a financial or other interest in the Project, either as suppliers or as organizations primarily associated (directly or indirectly) with construction materials and other supplies. They also provide expert opinions and advice on specific aspects of the Project that are relevant to their area of expertise.</li> </ul>	■	■
Educational and Scientific Institutions	<ul style="list-style-type: none"> <li>Universities and Educational Organizations (e.g. Democritus University of Thrace (DUTH), Fisheries Research Institute)</li> </ul>	<ul style="list-style-type: none"> <li>Possibly have a scientific interest in the project (research, education and training related to the Project)</li> </ul>	■	■

Group	Stakeholder	Description of potential Impact on interests/Influence	Impacts	Influence
General public	<ul style="list-style-type: none"> <li>General population outside the wider Project area</li> </ul>	<ul style="list-style-type: none"> <li>The general public may be interested in the Project because it can contribute positively to innovation and provide opportunities for building knowledge and expertise.</li> </ul>		
Potential lenders	<ul style="list-style-type: none"> <li>EBRD</li> </ul>	<ul style="list-style-type: none"> <li>They set standards (environmental, social, procurement, etc.)</li> <li>Potential lenders will have a direct impact/influence on the Project through decision-making at every stage of the Project</li> </ul>		



### Legend

Key stakeholders
Potentially Active Stakeholders
Other Stakeholders

Figure 3–2: Stakeholder map

## 4 PREPARATION OF THE STAKEHOLDER ENGAGEMENT PLAN (SEP)

### 4.1 APPROACH FOR DETERMINING THE METHOD, FREQUENCY, AND ALLOCATION OF RESOURCES FOR STAKEHOLDER ENGAGEMENT

To achieve the desired level of engagement and the defined objectives, the appropriate combination of tools and channels must be selected and applied at the appropriate phase of the Project.

The table below summarizes the approach regarding the methods that contribute to ensuring information disclosure and meaningful consultation throughout the Project's lifecycle, so that stakeholders are appropriately engaged. This list is not exhaustive.

**Table 4–1: Purpose and Method of Participation**

Purpose of Participation	Information	Dialogue	Active Participation	Collaboration
Method (Channels & Tools)	<ul style="list-style-type: none"> <li>Online and offline dissemination (physical/virtual events, dedicated website/section for the Project – other stakeholder websites – media)</li> <li>Press releases, newsletters, project presentations, speeches (basic information about the Project, benefits/opportunities, progress, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Consultation meetings</li> <li>Questionnaires</li> <li>Distribution of printed materials</li> <li>Online/offline monitoring/feedback reports on participation outcomes</li> </ul>	<ul style="list-style-type: none"> <li>Meetings with stakeholders</li> <li>Facilitated roundtables</li> <li>Ad-hoc direct contacts and calls</li> <li>Key informant interviews / focus groups</li> <li>Monitoring/feedback reports demonstrating understanding and consideration of the issues raised</li> </ul>	<ul style="list-style-type: none"> <li>Regular and ad-hoc direct contacts, discussions, meetings and phone calls</li> <li>Monitoring and feedback reports (online or offline) regarding all comments/input received</li> </ul>
GRIEVANCE MECHANISM				

The frequency of interaction is determined based on the stakeholder hierarchy, where the higher the levels of impact and influence, the more frequent and personalized the interaction, as illustrated in the figure below.

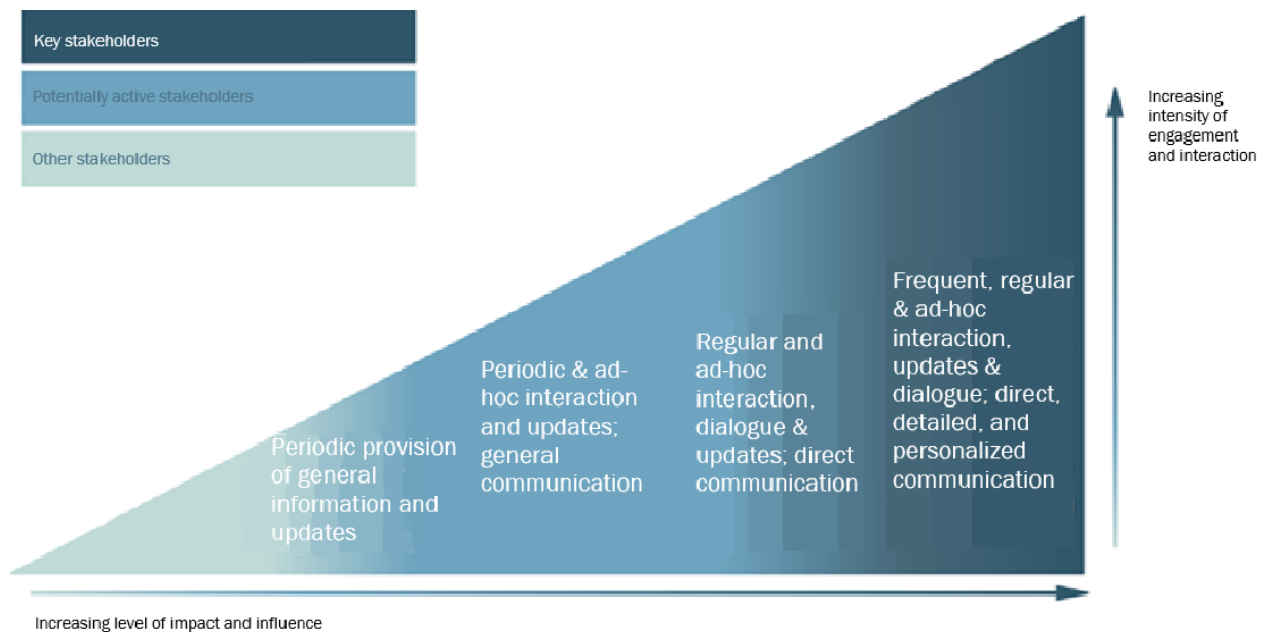


Figure 4-1: Frequency of Interaction

In a similar manner, the resources allocated for the management and implementation of the SEP should be proportionate to the depth and frequency of interactions. These will be defined as the project progresses and will include:

- Adequately trained personnel responsible for managing and overseeing the implementation of the SEP
- A sufficient budget allocated for the implementation of stakeholder engagement activities.

The capacity of designated personnel will also be regularly evaluated to ensure that they possess the appropriate qualifications. Where necessary, staff will be trained to acquire the knowledge and skills required to perform their duties effectively.

## 4.2 APPROACH TO INFORMATION DISCLOSURE AND EXCHANGE

The selection of the method and medium for disclosing and exchanging information should take into account how stakeholders typically access information and communicate. Accordingly, all disclosures and communications will be conducted in the local language (Greek), in an accessible, open, and appropriate manner—both offline (e.g. newspapers) and online (e.g. websites)—while also considering the rules and requirements of specific administrative bodies and authorities. In all cases, a variety of communication methods will be used to ensure outreach to the full spectrum of stakeholders. When reaching specific stakeholder groups presents challenges—due either to their nature or scale (e.g. the general public)—it is necessary to identify suitable intermediaries who can act as vehicles to facilitate the meaningful participation of the targeted stakeholders. For certain types of communication and reporting, the English language may also be used to meet the requirements of the project proponent (e.g. EBRD) and/or other institutional bodies. Finally, depending on each stakeholder group's level of technical knowledge, it may be necessary to adapt

the presentation of technical information into plain language to ensure information is more accessible to the audience.

### 4.3 APPROACH TO THE MANAGEMENT, MONITORING, AND EVALUATION OF THE SEP

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The implementation of the SEP will be monitored at regular intervals. EnEarth will be responsible for managing the SEP and, as noted above, will allocate appropriately trained personnel for this purpose.

The effectiveness of engagement activities will be evaluated by documenting and tracking performance indicators, which should be specific, measurable, and achievable. It is important to note that the monitoring and evaluation approach should be designed prior to actual engagement, to ensure that the necessary information will be collected.

The implementation of activities should be documented in a format that feeds back into the SEP, allowing the integration of stakeholder engagement outcomes into the decision-making process. Documentation may include, among others:

- A list of publications or reposts related to the Project, along with the source of publication.
- A stakeholder engagement activity log including details of meetings held, invited participants and attendance, information presented, comments and feedback received, and responses provided—including any commitments made to stakeholders.
- Meeting minutes and monitoring/feedback reports, or other simplified reports.

In addition, the Grievance Mechanism process—presented in a separate chapter—includes specific measures that contribute to the documentation, monitoring, and management of certain aspects of stakeholder engagement.

In all cases, stakeholder consent will be ensured for any form of personal data handling, and the management of such information will be carried out in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and applicable national legislation.

The results of monitoring and evaluation will be presented in reports and/or statements, which will be prepared at regular intervals or on an ad-hoc basis, depending on the needs of the Project and/or the requirements of relevant institutional bodies.

### 4.4 STAKEHOLDER ENGAGEMENT ACTION PLAN (SEAP)

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The final SEP will cover the following phases of Project implementation:

- Phase 1: Preliminary actions
- Phase 2: Preparation and disclosure of the Project's Environmental and Social Impact Assessment (ESIA)
- Phase 3: Construction
- Phase 4: Operation
- Phase 5: Decommissioning



This preliminary SEAP covers Phases 1 and 2. At this stage, using the information presented in the previous sections, the following key parameters for stakeholder engagement have been defined:

- Documents for disclosure/information sharing
- Method of engagement (tool/channel)
- Indicative timing and frequency
- Indicators for monitoring and evaluation

Based on the initial activities to be carried out, the SEAP covering Phases 1 and 2 will be updated to include additional elements, such as the resources to be allocated and the structure of the EnEath team that will hold overall responsibility for implementing the SEP.

Planned actions for the subsequent phases of the Project will be added in future versions of the SEP.

Table 4–2: Stakeholder Engagement Action Plan (SEAP)

Stakeholders	Level of Engagement	Actions	Description	Indicative Timing	Proposed Performance Indicators
All stakeholders	Information	Information activities (distribution / disclosure of Project-related information)	<ul style="list-style-type: none"> <li>• Project information for posting on official websites and use in meetings/presentations. This information will indicatively include:</li> <li>• Project scope</li> <li>• Brief overview of key project characteristics</li> <li>• Planned activities and estimated duration of each project phase</li> <li>• Project implementation progress</li> <li>• Brief description of anticipated positive impacts/opportunities from the Project</li> <li>• Employment opportunities</li> <li>• Information about the SEP</li> <li>• Project information will be updated accordingly throughout the Project's lifecycle.</li> <li>• Project-related information will also be disseminated through press releases and/or interviews in local and national media.</li> </ul>	Implementation will begin in Phase 1 (Preliminary actions) and continue throughout the duration of the Project.	<ul style="list-style-type: none"> <li>• Number of press releases, publications, and other outreach materials developed by the Project</li> <li>• Number of press releases, publications, and other outreach materials published/presented by the Project</li> <li>• Number of re-posts of Project material</li> <li>• Number and type (positive/negative) of third-party publications</li> </ul>
Regional and Local Authorities / Representatives of Local Institutions (e.g.	Information / Dialogue / Active Participation	Information and dialogue activities for scoping the content of the ESIA	<ul style="list-style-type: none"> <li>• Presentation of the existing and planned project to stakeholders</li> <li>• Presentation of the procedure to be followed during the environmental permitting process for projects and activities</li> </ul>	Implementation will begin in Phase 1 (Preliminary actions) and will be completed	<ul style="list-style-type: none"> <li>• Number of information/dialogue activities completed</li> </ul>

Stakeholders	Level of Engagement	Actions	Description	Indicative Timing	Proposed Performance Indicators
businesses, professionals, NGOs, scientific bodies)			<ul style="list-style-type: none"> <li>Discussion on the scope of the ESIA, e.g. identification of key environmental parameters potentially affected by the planned facilities, and incorporation/resolution of any relevant comments</li> <li>Presentation of the impact assessment/mitigation methodology, for both expected and unexpected events</li> <li>Understanding stakeholder issues that may need to be considered or integrated into the Project design and/or ESIA</li> <li>Consultation activities will take the form of meetings to be held either at the stakeholder premises or at EnEath offices</li> <li>Stakeholder views and suggestions regarding additional measures to further mitigate potential adverse impacts and enhance positive impacts will be recorded and considered.</li> </ul>	during Phase 2 (Preparation and disclosure of the ESIA)	<ul style="list-style-type: none"> <li>Number of information materials developed</li> <li>Attendance rate relative to invitations</li> <li>Number of meeting minutes prepared (including the presentation of comments and observations expressed, as well as the responses provided, including any commitments made to stakeholders)</li> <li>Number of reports prepared and disseminated</li> </ul>
Key stakeholders	Information / Dialogue / Active Participation / Collaboration	Information, dialogue and consultation activities with key stakeholders	<ul style="list-style-type: none"> <li>In the event that, during the preparation of the ESIA, environmental and social issues are identified that may significantly affect specific groups or individuals, it may be necessary to hold meetings to ensure that effective consultation with those stakeholders takes place, and that their potential concerns and views are duly considered and integrated into the decision-making process.</li> <li>These actions will take the form of meetings.</li> </ul>	Implementation will begin in Phase 1 (Preliminary Actions) and continue throughout the duration of the Project.	<ul style="list-style-type: none"> <li>Number of engagement activities completed</li> <li>Number of information materials developed</li> <li>Number of meeting minutes prepared (including the presentation of comments and observations expressed, as well as the responses</li> </ul>

Stakeholders	Level of Engagement	Actions	Description	Indicative Timing	Proposed Performance Indicators
					<p>provided, including any commitments made to stakeholders)</p> <ul style="list-style-type: none"> <li>Number of stakeholder views incorporated</li> </ul>
National Authorities and Institutions	Information / Dialogue / Active Participation / Collaboration	Collaboration with the competent authorities for environmental permitting	<ul style="list-style-type: none"> <li>The ESIA, along with the required documentation for the environmental permitting procedure, will be submitted to the competent authority (DIPA) in accordance with national legislation by EnEath.</li> <li>EnEath (in collaboration with the consultants preparing the ESIA) will provide any required supplementary/additional documentation or information, as requested, either electronically or in person.</li> </ul>	Phase 2 (Preparation and disclosure of the Project ESIA)	<ul style="list-style-type: none"> <li>Number of submissions completed, compared to the scheduled ones</li> <li>Number of requests for additional information successfully addressed within the defined target timeframe</li> </ul>
National, Regional, and Local Authorities and Institutions, and the General Public	Information / Dialogue (as needed) Active Participation / Collaboration (as needed)	Information activities and consultation for environmental permitting in accordance with legislation	<ul style="list-style-type: none"> <li>According to the relevant legal framework as presented in the above chapters, the ESIA, following completeness check, is forwarded by DIPA to the competent public authorities, bodies, and services, as well as to the Regional Council of Eastern Macedonia and Thrace, with a request for opinion.</li> <li>The ESIA is published on the Region's website, and the invitation to submit comments is announced in local and national media (at EnEath's expense) for the general public. At the same time, the ESIA is circulated by the Regional</li> </ul>	Phase 2 (Preparation and disclosure of the Project ESIA)	<ul style="list-style-type: none"> <li>Number of information/dialogue activities completed</li> <li>Number of media publications completed, compared to those required</li> <li>Number of requests for additional information</li> </ul>

Stakeholders	Level of Engagement	Actions	Description	Indicative Timing	Proposed Performance Indicators
			<p>Council to the relevant Municipal Councils / Committees for their opinion.</p> <ul style="list-style-type: none"> <li>At the end of the public consultation process, the opinions and comments of the public and other stakeholders are discussed during the relevant session of the Regional Council (public hearing). This session is open to the public, and EnEath (together with the ESIA consultants) is invited to participate in order to respond to any questions that may arise.</li> <li>The opinions collected are submitted to DIPA for evaluation.</li> </ul>		successfully addressed within the defined target timeframe
All Stakeholders	Information / Dialogue / Active Participation (as needed)	Additional information activities for the disclosure of the ESIA	<ul style="list-style-type: none"> <li>Disclosure of the ESIA on EnEath's website</li> <li>Announcement of the document's availability through press releases and notices in local and national media</li> <li>Activation of the grievance mechanism</li> <li>In cooperation with the Ministry, to ensure full compliance with the official consultation process:</li> <li>Direct notification of key stakeholders regarding the official consultation process, the access points to ESIA documentation, and the dates of public hearings</li> <li>Provision of support/guidance to any interested party (individual or group) who faces difficulties accessing the ESIA documents</li> </ul>		<ul style="list-style-type: none"> <li>Number of press releases, media publications, and other outreach materials developed by the Project</li> <li>Number of information/dialogue activities completed</li> <li>Number of requests for additional information successfully addressed</li> </ul>

Stakeholders	Level of Engagement	Actions	Description	Indicative Timing	Proposed Performance Indicators
All Stakeholders	Dialogue / Active Participation / Collaboration	Development and implementation of the Grievance Mechanism	<ul style="list-style-type: none"> <li>A Grievance Form (sample form included in the relevant section) will be posted on official websites, along with contact details (email, phone, fax) for the submission of complaints/grievances.</li> <li>Responsibility for the management and resolution of grievances lies with EnEath. This also applies in cases where third parties (e.g. contractors) are involved.</li> <li>EnEath is expected to ensure timely handling and resolution of complaints and concerns submitted via the website (forms, email, phone, fax) in cooperation with other relevant parties, as required. When a complaint is referred to a third party for resolution, it is important that the ultimate responsibility for resolution remains with EnEath, including in cases where the third party fails to reach an acceptable outcome.</li> <li>All grievances/opinions/objections and the responses to them will be logged and recorded in a digital database. Anonymous submissions will also be allowed. A non-retaliation policy will be applied and clearly communicated.</li> </ul>	Phase 2 (Preparation and disclosure of the Project ESIA) and at least 2 weeks prior to the start of Phase 3 (Construction)	<ul style="list-style-type: none"> <li>Number of grievances received and categorized by stakeholder group and by 3-month period</li> <li>Number of grievances submitted and acknowledged within the target timeframe of the Grievance Mechanism</li> <li>Number of grievances submitted and resolved within the target timeframe of the Grievance Mechanism</li> <li>Indicator on recurrence trends, e.g. number of complaints received more than twice within a 3–6 month period</li> <li>Number of reports produced</li> </ul>

## 5 Grievance Mechanism

The objective of the Grievance Mechanism procedure is to address and ensure an appropriate response to potential complaints and appeals raised by stakeholders, including the local population affected by the Project.

EnEarth is expected to hold responsibility for the management and processing of complaints and grievances. The designated officer (or team) will be tasked with receiving, recording, liaising with the relevant authorities, and overseeing responses to stakeholder complaints and requests.

### 5.1 MANAGEMENT AND TIMELINE FOR ACKNOWLEDGING RECEIPT AND RESOLVING COMPLAINTS

All complaints, concerns, and appeals—without exception—will be logged and recorded in the Project's grievance database and assigned a unique tracking number. An acknowledgment of receipt and registration of the complaint/appeal will be sent to the submitter within one week. The acknowledgment will include information on the tracking process and indicate the expected resolution date of the complaint or appeal. Responses will be provided in written form for all stakeholder complaints and appeals within 20 days. If the complainant is not satisfied with the response and the proposed resolution, state supervisory authorities or the court system may be involved to resolve the issue. Ο Μηχανισμός Παραπόνων θα είναι άμεσα προσβάσιμος από τον επίσημο ιστότοπο. The Grievance Mechanism will be directly accessible through the official website. Anonymous submissions will be allowed, along with a guaranteed non-retaliation policy. As the Project progresses, any additional access channels to the Grievance Mechanism will be identified and utilized.

### 5.2 STAGES OF THE GRIEVANCE MANAGEMENT PROCESS

Effective management and handling of complaints and appeals will be ensured through the following steps::

- 1 Issue identification
- 2 Logging/registration
- 3 Response to the stakeholder
- 4 Communication and request for feedback
- 5 Closure
- 6 Complaint registration form content

The Grievance Database will include the following information:

- Issue
- Contact details of the complainant
- Person/department responsible for addressing the issue
- Actions to be taken

- Deadline
- Proposed resolution
- Feedback from the complainant
- Outcomes
- Date of issue closure

Appropriate measures will be taken to ensure that procedures for the collection and processing of personal data are in compliance with the General Data Protection Regulation (EU) 2016/679.

### 5.3 GRIEVANCE FORM

Complaints and appeals may be submitted either in free written form or by using the dedicated Grievance Form presented below, which will be available in designated public locations as well as in digital format on the official Project website. In this way, all stakeholders will be able to submit complaints and appeals in person, by mail, email, telephone, fax, or through the website. Contact details will be provided on the website.

A proposed Grievance Form is presented below:

Ref. No.	
Name (Please indicate if you wish to remain anonymous or if you request that your identity not be disclosed to third parties without your consent)	
Relationship to the Project:	
Tel.:	
E-mail:	
Fax:	
Address:	
Preferred Language:	
Description of the issue raised (complaint/appeal):	
Source, date, frequency, and duration of the issue:	
Your suggestions for resolving the issue:	



Date of submission:	
Please return this form to the following address:	

The option to include attachments (e.g. photographs, documents, etc.) that may assist in understanding and addressing the grievance will also be considered at later stages.

In the event of EBRD financing, and in cases where the above mechanism proves unsuccessful, individuals and organizations may seek to address their concerns through the EBRD's Independent Project Accountability Mechanism (IPAM).

## 5.4 MONITORING OF THE GRIEVANCE MECHANISM OPERATION

A database of complaints and responses will be developed by the Project proponent. In addition, a grievance handling report will be prepared on a regular basis (at least semi-annually). The report will summarize the substance of each complaint/appeal received, assess its validity, and describe the actions taken.

## 6 MONITORING AND REPORTING

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EnEarth will be responsible for monitoring all stakeholder engagement activities related to the Project and for ensuring the implementation and regular updating of the full Stakeholder Engagement Plan (SEP).

Monitoring reports should include the following information:

- Location and timing of the activities and type of engagement, including information on participants (with gender-disaggregated data and specific information on the participation of vulnerable groups, where applicable).
- Issues and concerns raised during the meetings, and information on how these were taken into account.
- Monitoring and evaluation outcomes based on the selected performance indicators

The report will include a dedicated section on the Grievance Mechanism, which will contain a database outlining, at a minimum, the number and types of complaints submitted during the reporting period, indicating those that were filed, resolved, and closed, as well as a description of the corrective measures implemented to address them.

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