



## Port of Umm Qasr Yard 5 Terminal Development Environmental and Social Impact Assessment

### Stakeholder Engagement Plan

On Behalf of:  
Basra Multipurpose Terminal

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## List of Abbreviations and Acronyms

Abbreviation/Acronym	Description
BMT	Basra Multipurpose Terminal
CFS	Container Freight Stage
CLO	Community Liaison Officer
EAME	Earth & Marine Environmental Consultants
EHS	Environmental, Health, and Safety
EPIC	Environment Protection and Improvement Council
ESIA	Environmental and Social Impact Assessment
GCPI	General Company for Ports of Iraq
GoI	Government of Iraq
IDPs	Internally Displaced Persons
IFC	International Finance Corporation
IPA	Iraqi Ports Authority
KBA	Key Biodiversity Area
KPI	Key Performance Indicator
MoE	Ministry of Environment
MoHE	Ministry of Health and Environment
MoT	Ministry of Transportation
MoWR	Ministry of Water Resources
NGO	Non-Governmental Organisation
NDP	National Development Plan
PS	Performance Standard
RoRo	Roll-on/Roll-off
SCD	Stakeholder Consultation Database
SEP	Stakeholder Engagement Plan
UQP	Umm Qasr Port

## 1 Introduction

This document presents the Stakeholder Engagement Plan (SEP) for Port of Umm Qasr Yard 5 Terminal Development (“the Project”). Basra Multipurpose Terminal (BMT) has a 25-year concession to design, construct and operate Yard 5.

The overall objective of the Project is to develop Yard 5, in accordance with the National Development Plan (NDP) (Ministry of Planning, 2013), into a flexible and efficient terminal cargo, operating to international standards, handling container and Roll-on/Roll-off (RoRo). Specific Project objectives are to:

- Develop an international standard container and general cargo terminal which will assist with the current needs and future development of the country;
- Provide a berth structure designed for container handling equipment which will increase the capacity of Umm Qasr Port (UQP);
- Increase the efficiency of UQP, thereby, reduce vessel queuing times and traffic congestion; and
- Operate Yard 5 to international standards.

This is a document that sets out how potential stakeholders (parties whose activities may be affected by the proposals or who may have an interest in them) will be communicated with and informed by the developer.

### 1.1 Objectives

The purpose of the SEP is to set out a consistent and coordinated approach to stakeholders. Early engagement provides a valuable opportunity to influence public perception and set a positive tone with stakeholders, despite the many uncertainties and unknowns. The SEP is therefore designed to outline a plan for stakeholder engagement which will:

- provide timely information about the Project and its potential impacts on affected communities and other stakeholders;
- provide opportunities to those groups to voice their opinions and concerns in a way which is most appropriate to their circumstances; and
- provide an opportunity for feedback to, and discussion with, those communities concerning measures proposed.

This SEP has been prepared for BMT by Earth & Marine Environmental Consultants (EAME) during the design stage of the Project, alongside the preparation of the Environmental and Social Impact Assessment (ESIA).

The SEP has been prepared to achieve full compliance (where appropriate) with national statutory obligations, regulatory requirements, and supranational guidance. It is a “living document” and will be updated further as required during the construction and operation phases of the Project.

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## 2 Project Description

### 2.1 Background

The port sector has been recognised by the Government of Iraq (GoI) as an important sector which requires investment. The NDP 2013- 2017 (Ministry of Planning, 2013) states the need to boost efficiency and performance of existing facilities as well as developing new facilities. There is a large shortfall between the design capacity of the Iraqi port sector – approximately 15 million tonnes per year – and Iraqi projected import/export demand, estimated to be 53 million tonnes in 2018. As such, there is a need to develop, expand and modernise the Iraqi port sector.

It is recognised that there are several challenges to the port sector, including:

- Need to deepen, excavate and equip navigational channels into the ports;
- Remove all shipwrecks from the navigational corridors;
- Deficit of naval units, specialised port equipment, cargo-handling equipment and obsolescence of the current stock;
- Lack of government investment;
- Low berth occupancy ratio including container berths not being used as designed;
- Shortage of container yard space due to long dwelling time of imported containers;
- Lack of RTG and shortage of container yard space;
- Long waiting queue of trucks for entering port, loading cargo and clearing the departure gate;
- Lack of electronic means for data processing port operations;
- Low productivity of break bulk cargo operations. Discharging of sugar, wheat, rice is carried out by direct loading onto trucks on a wharf rather than storage and distribution later;
- Unskilled and unmotivated management and workforce;
- Lack of bulk loading and unloading facilities;



### 2.3 Current Security Situation

There has been a general deterioration in the security situation and rise in civil unrest in Iraq in recent times, which has some influence over the Project, and which should be noted.

Since the summer of 2018, demonstrations and protests have been held across Iraq relating to the lack of employment opportunities, corruption and the lack of basic services including electricity and clean water. The protests originated as Iran cut electricity supplies to Basra during a heat wave. The countrywide protests have led to arrest, injury and death. The nationwide protests have continued into early 2019. It should be noted that in July and September 2018, that UQP was temporarily closed as protestors blocked the port's entrance.

In addition, in September and October 2018, there were several assassinations both random and targeted. The targeted assassinations have involved protest leaders as well as prominent women including a human rights activist.

### 2.4 Summary of Identified Environmental and Social Issues

**Error! Reference source not found.** summarises the environmental and social impacts identified by the ESIA.

With the implementation of mitigation measures, the residual effects of both the construction and operational phases are considered to be minor adverse to negligible. Beneficial effects during both phases include employment, skills and livelihoods and economic growth due to demand for local goods and services.

**Table 2.1:** Summary of identified environmental and social issues

Topic	Construction Phase	Operational Phase
<b>Land quality</b>	<ul style="list-style-type: none"> <li>Contamination of soils and groundwater by contamination of soils and groundwater by contaminated dredged material</li> </ul>	<ul style="list-style-type: none"> <li>Contamination because of accidental spillage of fuels or chemicals</li> </ul>
<b>Surface water resources</b>	No significant impacts provided best practice is followed	<ul style="list-style-type: none"> <li>Increased flood risk</li> </ul>
<b>Surface water quality</b>	<ul style="list-style-type: none"> <li>Washout of material or spillages into the river</li> <li>Impacts from the construction waste stream</li> <li>Direct contamination from construction machinery</li> <li>Unmanaged erosion/sediment depositions and suspended soils</li> </ul>	<ul style="list-style-type: none"> <li>Risks of pollution from operational waste streams</li> <li>Poorly designed site drainage</li> </ul>
<b>Groundwater</b>	<ul style="list-style-type: none"> <li>Groundwater contamination due to leaks and spills</li> </ul>	No significant impacts provide best practice is followed
<b>Biodiversity</b>	Scoped out of assessment	Scoped out of assessment
<b>Transport</b>	<ul style="list-style-type: none"> <li>Driver delay</li> <li>Accidents and safety</li> </ul>	<ul style="list-style-type: none"> <li>Driver delay</li> <li>Accidents and safety</li> </ul>
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>Construction dust</li> <li>Construction vehicle emissions</li> </ul>	<ul style="list-style-type: none"> <li>Operational vehicle emissions</li> </ul>
<b>Noise</b>	<ul style="list-style-type: none"> <li>Construction activity noise from fixed and mobile plant, piling and dredging</li> </ul>	<ul style="list-style-type: none"> <li>Operational noise for NSRs represented by NAL01</li> <li>Operational noise for NSRs represented by NAL02</li> </ul>

Topic	Construction Phase	Operational Phase
<b>Waste</b>	<ul style="list-style-type: none"> <li>▪ Handling and storage of excavated material</li> <li>▪ Re-use of excavated material on-site</li> <li>▪ Handling and storage of suitable dredged material</li> <li>▪ Re-use of suitable dredged materials</li> <li>▪ Re-use of suitable dredged material</li> <li>▪ Handling and safe storage of general waste including office waste, vegetation and recyclable wastes including paper, tins, glass and plastic waste and organic matter</li> <li>▪ Handling and storage of hazardous wastes</li> <li>▪ Collection and transportation of hazardous waste</li> <li>▪ Disposal to landfill of hazardous waste</li> <li>▪ Disposal to landfill of hazardous waste</li> <li>▪ Disposal to landfill of empty containers e.g. chemical containers or bags or paint, thinners, turpentine containers etc.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Handling and safe storage of general waste, including office waste, including office waste and recyclable wastes including paper, tins, glass and plastics</li> <li>▪ Recycling of vehicle and plant maintenance waste i.e. oil or grease contamination filters and recycling or re-use of empty chemical containers or bags</li> <li>▪ Disposal to landfill of general waste</li> <li>▪ Disposal to landfill of general waste, including office waste, and paper, tins, glass and plastic waste and organic matter</li> <li>▪ Handling and storage of hazardous wastes generated by the operation phase</li> <li>▪ Collection/transportation of hazardous waste</li> <li>▪ Disposal to landfill of hazardous waste</li> <li>▪ Recycling of vehicle and plant maintenance waste i.e. oil or grease contaminate filters and recycling or re-use of empty chemical containers or bags</li> <li>▪ Disposal to landfill of empty containers e.g. chemical containers or bags or point, thinners, turpentine containers etc.</li> </ul>
<b>Sediment</b>	<ul style="list-style-type: none"> <li>▪ Risk to sediment quality</li> </ul>	<ul style="list-style-type: none"> <li>▪ Scoped out of assessment</li> </ul>
<b>Social</b>	<ul style="list-style-type: none"> <li>▪ Employment, skills and livelihoods (local)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Employment, skills and livelihood (local)</li> </ul>

Topic	Construction Phase	Operational Phase
	<ul style="list-style-type: none"> <li>▪ Employment, skills and livelihoods (wider)</li> <li>▪ Protection of surface water resources</li> <li>▪ Damage to religious and cultural sites</li> <li>▪ Noise, vibration and dust</li> <li>▪ Risks to workers</li> <li>▪ Labour issues</li> <li>▪ Human rights</li> <li>▪ Community health, safety and security</li> <li>▪ Infrastructure and services</li> <li>▪ Population influx</li> <li>▪ Potential for conflict</li> <li>▪ Terrorism, kidnapping, piracy and banditry</li> <li>▪ Economic growth</li> </ul>	<ul style="list-style-type: none"> <li>▪ Employment, skills and livelihood (wider)</li> <li>▪ Noise, vibration and dust</li> <li>▪ Risks to workers</li> <li>▪ Labour issues</li> <li>▪ Human rights</li> <li>▪ Community health, safety and security</li> <li>▪ Potential for conflict</li> <li>▪ Economic growth</li> <li>▪ Terrorism, kidnapping, piracy and banditry</li> </ul>
<b>Archaeology and cultural heritage</b>	<ul style="list-style-type: none"> <li>▪ Scoped out of ESIA, general mitigation measures provided</li> </ul>	Scoped out of assessment
<b>Landscape and visual</b>	<ul style="list-style-type: none"> <li>▪ Scoped out of ESIA, general mitigation measures provided</li> </ul>	Scoped out of assessment

### 3 Policy, Legal and Institutional Framework

#### 3.1 Introduction

This section sets out the requirements that apply to stakeholder engagement for the Project. These include:

- National requirements as set out in the legal framework for ESIA in Iraq; and
- International guidelines.

#### 3.2 National Requirements for Stakeholder Engagement

There is no direct local legislation regarding the provision of a SEP, however, Chapter 1, Article 1 of the Law No. 27 of 2009 – Protection and Improvement of the Environment, states the following:

*‘This law aims at protecting and improving the environment through removing and treating the already existing damages or that which may happen and saving the public health, natural resources, the biological diversity and the cultural and natural heritage in cooperation with competent authorities to accomplish the sustainable development and to achieve the international and territorial cooperation in this field’.*

Whilst paragraph 5 of Chapter 14, Article 14 of Law No. 13 of 2006 – The Investment Law states that the investor must:

*‘.....protect the safety of the environment and to adhere to the valid quality control systems in Iraq and international regulations accredited in this field, also the laws related to security, health, public order and values of the Iraqi society’.*

At a national level, whilst environmental protection is espoused in several legislative instruments, the expectation of public participation and stakeholder engagement is not yet enshrined in federal and national legislation. Furthermore, where environmental legislation does exist it tends to be focussed on oil and gas activities and is more aspirational than a rigorously monitored and enforced regime. There is, however, clearly an acknowledgement that social issues should be considered and a recognition that International Standards should be applied.

### 3.3 International Guidelines

Due to the lack of appropriate local legislation and weak enforcement of the legislation that does exist, international projects rely on international best practice and associated guidelines.

#### **IFC Performance Standards**

The International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability and the IFC Environmental, Health and Safety Guidelines are generally accepted as the international benchmark for good practice in environmental and social risk and impact management. The revised standards have been effective since January 2012 and provide guidance to a developer in planning good practice stakeholder engagement. The IFC PSs require clients to engage with affected communities through the disclosure of information, consultation and informed participation, in a manner commensurate with the risks to and impacts on the affected communities.

The following IFC procedures, policies and practical manuals are relevant:

#### *Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts*

One objective of this Performance Standard is to promote and provide means for adequate engagement with Affected Communities throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated. PS 1 also supports the use of an effective grievance mechanism that can facilitate early indication of, and prompt remediation for those who believe that they have been harmed by a client's actions.

Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. The IFC recommends providing Affected Communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.

Effective consultation is a two-way process that should: (i) begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise; (ii) be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities; (iii)

focus inclusive engagement on those directly affected as opposed to those no directly affected; (iv) be free of external manipulation, interference, coercion, or intimidation; (v) enable meaningful participation, where applicable; and (vi) be documented.

*Performance Standard 5: Land Acquisition & Involuntary Resettlement*

International best practice for private sector related resettlement is now guided by the IFC's Performance Standards on Social and Environmental Sustainability, and particularly Performance Standard 5: Land Acquisition & Involuntary Resettlement. PS 5 notes that there should be consultation and informed participation of affected persons and communities in decision-making processes related to settlement. A grievance mechanism should also be established to receive and address specific concerns about compensation and relocation.

*Vulnerable people*

IFC recommend special attention is given to vulnerable stakeholders. Vulnerable people include those who by virtue of their gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by a project than others, and who may be limited in their ability to take advantage of a project's development benefits.

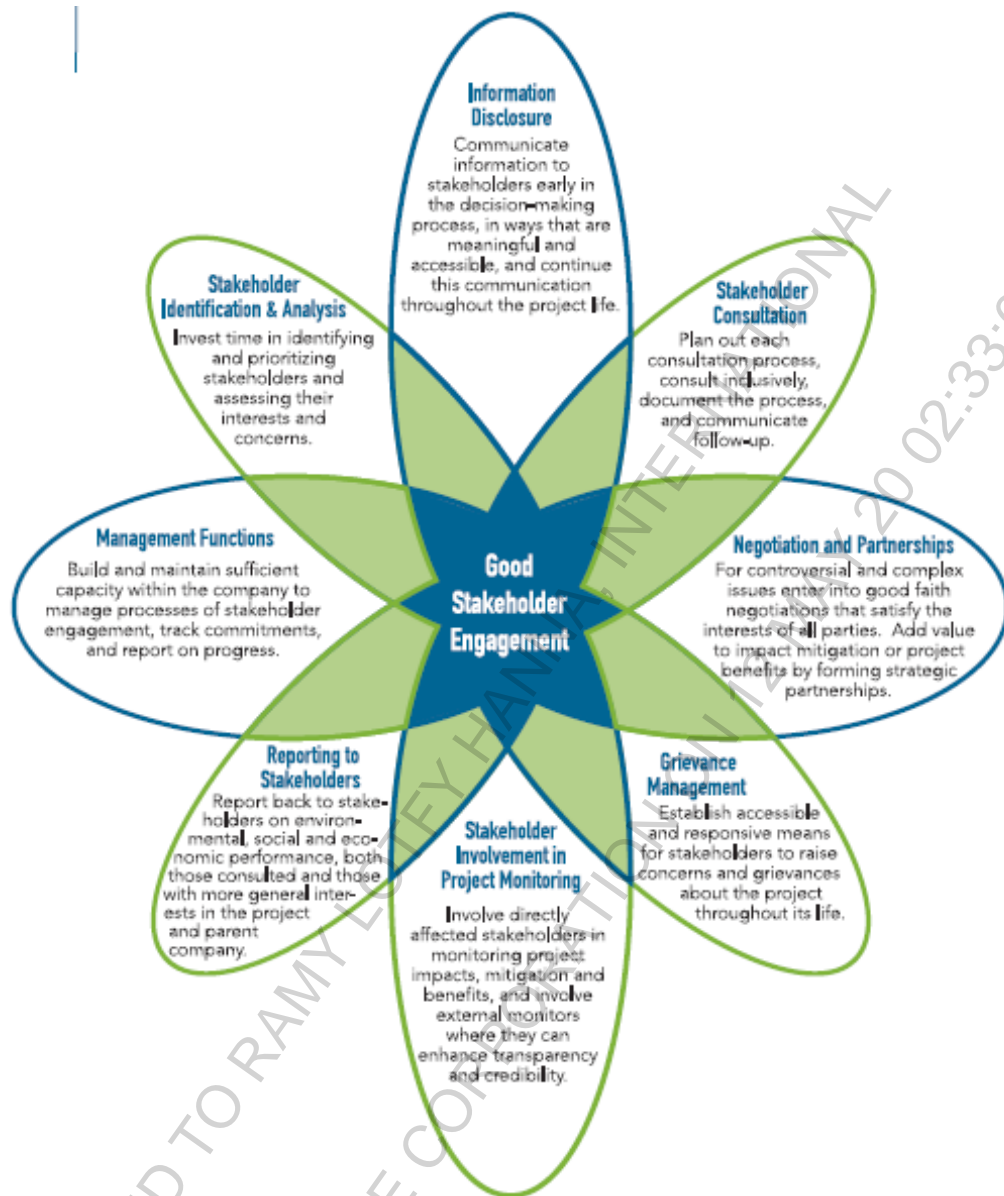
The Performance Standards outline requirements for engagement with vulnerable people and should include differentiated measures to allow for the effective participation of these people. Experience of working in Iraq generally, has identified the following groups as potentially vulnerable:

- Females in general are typically in a disadvantaged position in Iraqi society but in particular female headed households are vulnerable as a result of reduced access to income generating opportunities and higher levels of food insecurity
- Elderly. The elderly are less likely to receive an income and are reliant upon other members of their household or community for sustenance;
- Children. Children are mainly reliant upon older members of the household to represent their interests and for general wellbeing;
- People with Physical/Mental Health Illnesses and Disabilities. There are unlikely to be many services or systems to encourage the economic and social participation of disabled stakeholders in the community;

- Internally Displaced Persons (IDPs). The recent conflict in Northern and Western Iraq and Syria has led to the displacement of a significant number of people who as a result of the displacement, may have experienced impacts to their access to resources, infrastructure, community cohesion and livelihoods; and
- Marsh Arabs. These were displaced when the Mesopotamian Marshlands were drained by Saddam Hussein after the 1991 Gulf War. Despite parts of the Marshlands being subsequently reflooded, few Marsh Arabs have returned, and many continue to reside outside of the Marshlands and suffer from discrimination, poverty and a lack of social inclusion.

*Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*

The IFC has prepared an updated and revised guide entitled Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (International Finance Corporation, 2007). This guide details the procedure for managing stakeholder engagement. The key components of stakeholder engagement as reported in the Handbook are set out in **Figure 3.1**.



**Figure 3.1: Key components of stakeholder engagement**

## 4 Summary of Previous Stakeholder Engagement

Details of previous stakeholder engagement has been requested, however, it is yet to be received.

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## 5 Project Stakeholders

### 5.1 Introduction

Stakeholder identification and analysis is the critical first step in stakeholder consultation and engagement. This section outlines the process by addressing the following:

- Approach to the identification of stakeholders;
- Definition of a stakeholder;
- Description of stakeholder groups; and
- Analysis of stakeholders.

### 5.2 Approach to Stakeholder Identification

In order to develop effective stakeholder engagement, it is necessary to identify who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. It is important to understand how each stakeholder may be affected - or perceives they may be affected - by the Project so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner. In particular, attention should be paid to identifying individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the Project because of their marginalised or vulnerable status.

Stakeholder identification is an on-going process, requiring regular review and updates. Stakeholders have and will be identified through:

- Consideration of engagement undertaken to date by BMT;
- Secondary data review;
- Discussions with Ministries including the Ministry of Health and Environment (MoHE);
- Consideration of the area of influence of the Project insofar as it has been defined in the ESIA;
- Referrals from other stakeholders; and
- Contact made by organisations expressing an interest in the Project

### 5.3 Stakeholder Definition

For the purposes of this SEP, a stakeholder is defined as:

“persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.” (International Finance Corporation, 2007)

### 5.4 Stakeholder Groups

The expected stakeholder groups that the SEP will seek to connect with are outlined in



**Figure 5.1.** These are based on the present state of knowledge about the Project and the stakeholder communities in Iraq. The list may be modified in the light of ongoing engagement activities.



**Figure 5.1: Stakeholder groups**

**Government**

Government departments are those who have the power to regulate or influence the Project in terms of establishing policy, granting permits or other approvals for the project as well as monitoring and enforcing compliance throughout the Project’s lifecycle.

*Ministry of Transportation*

Established in 1921, the Ministry of Transportation (MoT) is the competent agency for port administration.

*Iraqi Port Authority*

The administration of all port operations is under the direction of the Iraq Ports Authority (IPA), based in Basra.

*General Company for Ports of Iraq*

General Company for Ports of Iraq (GCPI) is a state-owned company under the jurisdiction of the Ministry of Transportation established under the Law on State-owned Companies (Law No.22 of 1997) and manages ports based on the Law of Ports and Harbors. GCPI manages and operates Iraq's ports in accordance with these regulations. GCPI is also concerned with navigation in Iraqi territorial waters and carries out maintenance and dredging activities of the channels. GCPI owns the land on which the Project will be built and GCPI has the authority to manage, operate and develop it.

#### *Ministry of Health and Environment*

The MoHE is the highest institutional authority for the environment within Iraq. The MoHE was initially established as the Ministry of Environment (MoE) in August 2003 under Order No. 44 on the Establishment of the MoE set forth by the Coalition Provisional Authority (CPA), and then re-established under the 2008 Environmental Law (Law No. 37 of 2008 on the Creation of MoE). The principal responsibilities of the MoE include protecting and conserving Iraq's environment, developing environmental policies and programmes, and promulgating and enforcing environmental standards. The Ministries of Health and Environment were merged in August 2015.

The MoE developed and published the Law No. 27 of 2009 on Protection and Improvement of the Environment, which establishes the environmental framework currently in place in Iraq. Law No. 27 also established a national Environment Protection and Improvement Council (EPIC) and its provincial branches. The activities of provincial EPICs are reviewed by the national EPIC, which in turn reports to the MoHE with advice on any proposed environmental matters and projects related to protecting and improving the environment in Iraq.

#### *Ministry of Water Resources*

The Ministry of Water Resources (MoWR) was established under Law No. 50 of 2008 on the Establishment of the MoWR. The principle responsibilities of the MoWR include managing surface water and groundwater resources for optimum usage and protecting surface water and groundwater from pollution.

Other governmental departments recommended for inclusion by the Ministries above will also be classed as stakeholders.

### **Community leadership**

#### *Mayors of Sub-districts*

Mayors of surrounding sub-districts are conduits to local communities. Mayors are appointed to their positions and may be people of prominence and influence in the area. They play a critical role in allocating unskilled jobs, and dispute resolution.

### **Communities**

#### *Project Affected Communities and Individuals*

This stakeholder group includes all people who may be directly or indirectly affected by the Project activities; including formal and informal leaders and/or representatives of these people including tribal leaders, religious leaders, business people and/or people of community influence or standing.

#### *Vulnerable Groups*

Vulnerable groups may have difficulty in engaging with the stakeholder consultation process and thus may not be able to fully express their concerns regarding the Project. The project team will seek to identify representative persons with access to or knowledge of this cohort and will hopefully facilitate communication.

### **Private sector**

Individuals or organisation with direct economic interest in the Project or whose business activities may be affected by it. This may be positive, through gaining contracts with the developer, or negative due to economic impact caused by the Project. These stakeholders may be contacted through such organisations such as the Chambers of Commerce for Basra.

### **Financial lenders**

Multilateral, bilateral and private sector financial institutions providing project finance for construction and implementation of the Project are a key stakeholder group with a strong interest in the robustness of the ESIA and social engagement aspects of the project.

### **Non-Governmental Organisations**

Organisations with direct interest in the Project and that are able to influence the Project directly or through public opinion. Such organisations may also have useful data and insight and may be able to become partners in areas of common interest.

### **Civil society**

This group includes members of the wider general public in Iraq and civil society organisations such as religious groups, co-operatives, unions, professional associations, cultural groups, citizen's associations as well as environmental and social groups.

#### **Research/Academic organisations**

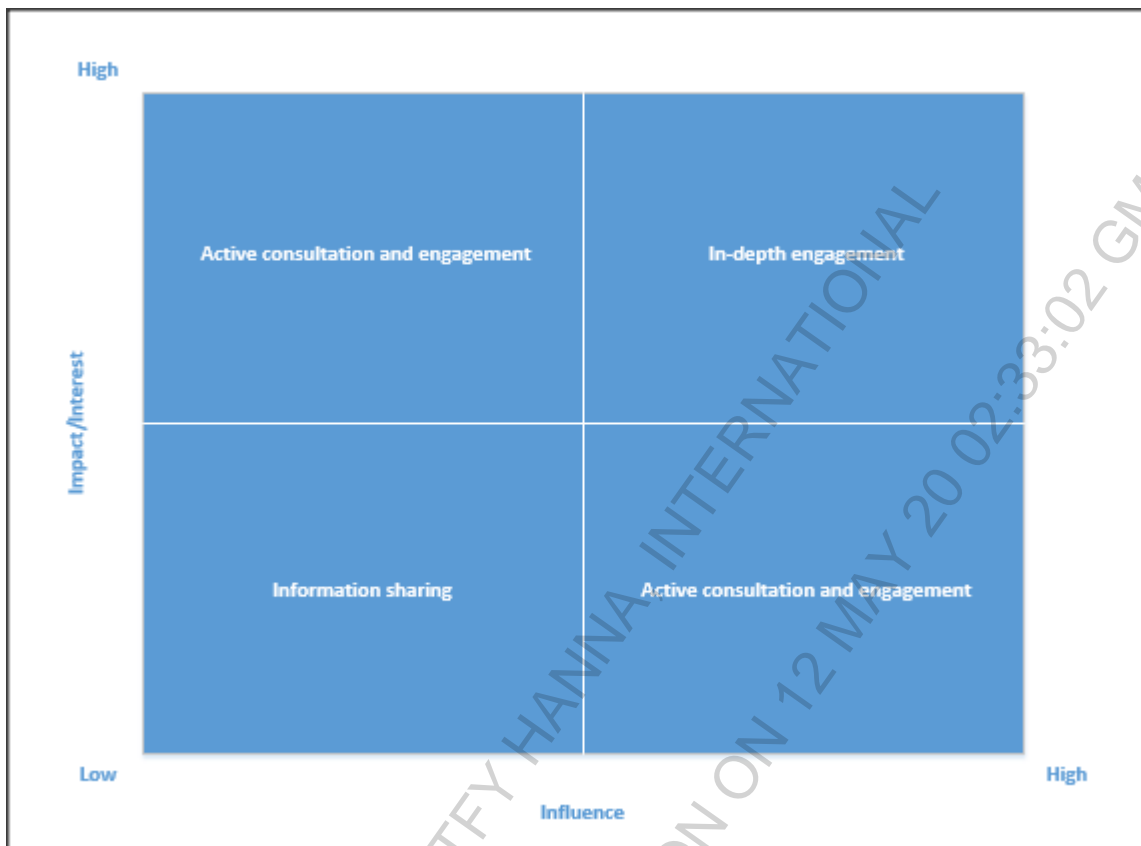
Other international, regional and local groups with direct interest in the Project who may be undertaking work relevant to the Project who may have views on the Project or information that will be useful for the assessment and management of Project impacts.

### **5.5 Stakeholder Analysis**

An initial stakeholder analysis has been undertaken to determine the likely relationship between stakeholders and the Project. The results of the analysis provide an indication of the level and methods of consultation and engagement appropriate to each stakeholder group during the life of the Project.

A simple structure for the analysis of stakeholders has been used, classifying stakeholders according to their "impact/interest" and their "influence" on the Project, as set out in **Figure 5.2**. In general, consultation and engagement should intensify and deepen as impact/interest and influence increase. The following characteristics have been used to locate stakeholders on the analysis matrix:

- Physical location relative to the Project and hence potential for impact;
- Attachment to the area that might be affected by the Project; and
- The degree to which the Project is relevant to the mandate or jurisdiction of an institutional body with regulatory, watchdog or shareholding influence over the Project.



**Figure 5.2:** Stakeholder analysis matrix

Error! Reference source not found. provides a guideline for the stakeholder analysis in order to correctly locate the stakeholder in the matrix. The guidance also presents the general criteria used to determine stakeholder location the impact/interest and influence axes.

**Table 5.1:** Stakeholder analysis guidance

	Impact/interest	Influence
High	High degree of impact as a result of the Project (e.g. complete loss of livelihood, resettlement etc.). OR: The Project is directly related to stakeholder's institutional field of interest and/or responsibilities	The stakeholder has decision-making powers that can adversely affect the Project's operations. Or assertion of the Stakeholders rights or interests could compromise the project deliverables.

	<b>Impact/interest</b>	<b>Influence</b>
<b>Medium</b>	The stakeholders will experience some degree of impact but impacts can be managed and/or mitigated OR: The Project or aspect thereof has some relevance to stakeholder’s institutional field of interest and/or responsibilities.	The stakeholder or their interests can influence the Project’s operations, systems and processes.
<b>Low</b>	The stakeholder will experience very few effects as a result of the project OR: The Project has limited relevance to stakeholder’s institutional field of interest and/or responsibilities.	The stakeholder has very little influence over the Project.

**Table 5.2** provides the outcome of the stakeholder analysis. Section 6 details the engagement framework for the ESIA and associated engagement during the construction phase and life of Project.

**Table 5.2:** Stakeholder analysis

<b>Stakeholder Group</b>	<b>Impact / Interest Rating</b>	<b>Influence Rating</b>
Government	<b>High</b> GCPI are the land owners. Government authorities will have a direct interest in the Project, particularly with the environmental regulators.	<b>High</b> The government has the power and mandate to approve the ESIA. Community leadership have a wide-ranging local influence.
Community Leadership	<b>High</b> Direct interest in the Project	<b>Medium to High</b> Influence Project design and management plans required to mitigate adverse impacts.
Communities	<b>Medium to high</b> Most affected communities will potentially experience some degree of impact and will be interested in participating in engagement processes during the life of the Project.	<b>Low to Medium</b> The affected communities, who are largely disempowered, have limited local influence and little leverage over the Project, however, they are able to influence the management

Stakeholder Group	Impact / Interest Rating	Influence Rating
		of Project impacts and design options.
Private Sector	<b>Low to Medium</b> Local commerce and businesses with supply chance potential will be interested in becoming involved with the Project.	<b>Low</b> Local commerce and business will have a limited influence over the Project.
Financial Lenders	<b>High</b> Investors will have a vested interest in the Project.	<b>High</b> Investors will ensure the Project adheres to international standards
NGOs	<b>High</b> Due to the unique environment, international NGOs are a critical stakeholder who are likely to have a vested interest in the Project	<b>High</b> International NGOs are usually well-organised and can directly influence the outcomes of the ESIA process.
Civil Society	<b>Medium</b> Will have an interest in the Project by virtue of their interest in development, social mobility and support to vulnerable groups.	<b>Medium</b> Local civic organisations may have local influence upon the Project
Academic/Research Institutions	<b>Medium</b> Possibility to provide further information to their research or opportunities for further research.	<b>Low</b> Little influence on the Project design.

## 6 Project Stakeholder Engagement Programme

### 6.1 Introduction

This section sets out the stakeholder engagement programme for on-going engagement and disclosure, as part of the preparation and publication of the ESIA and the construction and operation of the Project.

### 6.2 Engagement Goals and Objectives

The fundamental objectives of stakeholder engagement, taking into account the objectives set out in the IFC Stakeholder Engagement Handbook (International Finance Corporation, 2007), are to:

- Establish and deliver the following eight core activities and interactions over the Project life that comprise the following components;
  - Stakeholder identification and analysis
  - Information disclosure
  - Stakeholder consultation
  - Negotiation and partnerships
  - Grievance management
  - Stakeholder involvement in project monitoring
  - Reporting to stakeholders
  - Management functions
- Achieve full compliance (where appropriate) with national statutory obligations, regulatory requirements, and supranational guidance;
- Commence relationship building at the earliest opportunity to influence public perception and establish a positive yet progressive approach upon which to build trust, mutual respect and a common understanding that the views and well-being of communities and associated stakeholders to avoid disadvantaging project progress in the event of a crisis;

- Build and maintain mutually beneficial and sustainable relationships between BMT, GoI and stakeholders; and
- Ensure that stakeholders are cognisant of the Project, impacts and benefits, providing informed access to redress where necessary and the opportunity to discuss and negotiate sustainable development solutions.

The stakeholder engagement programme set out below therefore aims to:

- Ensure timely, accessible and appropriate dissemination of information in culturally appropriate formats, to facilitate an accurate and realistic understanding of potential impacts, mitigation measures and benefits generated by the Project;
- Provide structured, objective and responsive consultation methodology, ensuring clarity of purpose, appropriate notification, clear disclosure of objectives and an agreed process of interaction, recording and follow-up;
- Allow for two-way engagement so that all sides have the opportunity to exchange views and information;
- Be considerate of indigenous social and cultural sensitivities;
- Provide stakeholders and especially communities with the appropriate means to address concerns and grievances, in a structured, reliable and responsive manner;
- Be gender inclusive;
- Integrate vulnerable and disadvantaged individuals, communities and their representatives in social cohesion and stakeholder engagement activities to ensure proportionate and equitable representation of concerned and impacted community groups and individuals;
- Report in a structured, systematic manner to all stakeholders; and
- Establish and maintain the management capacity, responsibilities and systems to ensure the effective implementation of the SEP.

### 6.3 Expectation Management

It is important to ensure that the Project does not create or allow unrealistic expectations to develop amongst stakeholders about potential Project benefits or the extent to which a project can be modified to accommodate their concerns or interests.

The SEP is one of the primary vehicles to manage expectations. The engagement process will serve as a mechanism for understanding and managing stakeholder and community expectations, by disseminating accurate information in an accessible way ensuring that expectations are realistic and factually informed.

The following expectation management guidelines will be applied:

- Formulation of a clear, concise, accessible and factual background information document. This will be disseminated prior to each round of consultation and will inform the content of the consultation;
- Ensuring an informed and consistent consultation team;
- Seeking to provide honest and factual responses to participants in all engagement activities. An overly cautious approach might leave stakeholders starved of information, promoting dissatisfaction and unfounded rumours. An attempt to impress stakeholders might lead to commitments and promises that cannot be honoured;
- Aspects that are outside the control of BMT/the Project Operators, for example technical difficulties, actions that rely on third parties such as the electricity supplier, will be clearly communicated;
- Advance notice of meetings will be given, and efforts made to ensure that all necessary stakeholders are aware of the time and place of all relevant meetings;
- All specialists will be briefed on the importance of communicating a collective, honest and factual message that does not raise expectations amongst stakeholders and neighbouring communities; and
- A Community Grievance Mechanism will be employed (see **Section 9** of this SEP).

## 6.4 Availability of Information

Making available information on the Project allows stakeholders to familiarise themselves with the environmental and social risk and impacts associated with the projects as well as the opportunities that the Project with provide.

## 6.5 Methods of Communication

With consideration of the current security situation, the following methods of communication and consultation that can be employed in the implementation of the SEP include:

- Publication of Project information in Arabic;
- Formal meetings with government ministries and departments;
- Participatory public exhibitions with communities;
- Informal meetings with communities;
- Engagement with communities via social media;
- Email correspondence;
- In person surveys with affected people;
- Provision of general information on a community noticeboard. A notice board will be sited in a prominent location at the site. This shall include details of the Community Liaison Officer (CLO) as well as details of the Community Grievance Mechanism;
- Site induction for all site personnel (construction, operational and decommissioning); and
- Health and Safety notice board at the site which will provide details of the Worker Grievance Mechanism and the Occupational Health and Safety (OHS) Plan.

## 6.6 Stakeholders Engaged during Scoping Phase

The stakeholder engagement activities undertaken during scoping are detailed in **Table 6.1**.

**Table 6.1:** Summary of stakeholder engagement activities undertaken during scoping

Activity	Objective	Stakeholder Group
Issue of Scoping Report	Identify significant issues and determine the scope of the impact assessment phase.	– BMT
Issue of Concise Scoping Report	Summary of the scoping report translated into Arabic	– Government authorities; – NGOs; and – Civil Societies.
Issue of SEP	To set out a consistent and coordinated approach to stakeholder engagement.	– BMT
Formal meetings Public exhibition Informal meetings	Information disclosure about the Project and the ESIA process. Respond to any queries or concerns. Obtain, where possible baseline environmental and social information relevant to the project. Obtain socio-economic data from community stakeholders.	– Government authorities; – Communities; – NGOs; and – Civil Societies.

### 6.6.1 Methods of Consultation

Stakeholder engagement was undertaken via three main methods:

- Formal meetings;
- Public exhibition with community stakeholders; and
- Informal meetings with community stakeholders.

It should be noted that, in Iraq, public exhibitions tend to be sparsely attended and as such informal meetings are the better method of engaging with community stakeholders and for

collecting baseline demographic and socio-economic information, and therefore were included in the methods of consultation.

A summary list of all those consulted is provided in

**Table 6.2.**

**Table 6.2:** Summary of stakeholder groups consulted during scoping

Date	Stakeholder Group	Details
14 <sup>th</sup> December 2017	Government Authorities	Umm Qasr Council Town Council
29 <sup>th</sup> January 2018	Government Authorities	Umm Qasr Mayor and Council Member
28 <sup>th</sup> January 2018	Government Authorities	Khor Al-Zubair Port (GCPI)
31 <sup>st</sup> January 2018	Communities, Community Leadership and Private Sector	Public Exhibition – Al Quds Primary School
15 <sup>th</sup> – 17 <sup>th</sup> March 2018	Communities, Community Leadership and Private Sector	Informal meetings - Multiple locations throughout the Area of Influence (AOI)
January – March 2018	Government Authorities	Concise Scoping Report provided to governmental bodies likely to have an interest in the Project

**Formal Meetings**

Formal meetings with interest-based stakeholders who have the most influence over the Project such as government regulatory bodies and NGOs were undertaken. The purpose of these meetings was to:

- Disclose information about the Project and the consultation process;
- Enable the site visit team to respond to any queries/concerns that stakeholders had about the Project; and
- Obtain where relevant environmental and social information to inform the ESIA preparation by gathering baseline information and identification of likely significant impacts.

During the meetings, the team introduced themselves, explained the Project and the ESIA process and then invited comments and questions. Any comments or questions raised by stakeholders were discussed until the stakeholders were satisfied with the level of information provided.

The posters for the public exhibition and the Concise Scoping Report was provided to the meeting attendees on a USB memory stick.

### **Public Exhibition**

A public exhibition was held in the hall of Al Quds Primary School. This venue was chosen for the ease of access and to provide as much visibility for the exhibition as possible. The public exhibition was advertised on social media by Umm Qasr Town Council.

At the public exhibition, concise, non-technical posters of the Project were presented using a multi-lingual team. These posters provided an outline of the Project, the need for the Project, the reason for the public exhibition as well as presenting the potential benefits and impacts of the Project. Finally, attendees were requested to provide any comments or queries they have of the Project. The posters were written in Arabic. International staff were in attendance to answer any technical queries that the attendees had.

A standardised questionnaire which provided further opportunity to provide feedback and comments on the Project was completed by the attendees.

It was noted that only men attended this public exhibition, which is not unexpected due to the patriarchal nature of Iraqi society. However, vulnerable groups, including representatives of the Black Iraqi community where noted to have attended the public exhibition.

### **Standardised Questionnaires**

Informal meetings were used to engage with community stakeholders. These meetings, using non-technical language, were undertaken on a one to one basis using a multi-lingual survey team to discuss the Project and to address any individual concerns. A standardised questionnaire was used to provide the community stakeholders opportunity to provide feedback on the project as well as to provide comments on the Project.

These questionnaires also allowed for the collection of baseline demographic and socio-economic information through a survey focusing on household composition, education levels, general health status, livelihood strategies, employment, and income and expenditure. The survey team were there to help with any issues with illiteracy or language issues.

Data was captured offsite into a database, analysed, and then used to describe and interpret the overall opinion of the Project from the responding community.

The opinions and consultation of the stakeholders, both interest and community, contributed to the generation of mitigation measures for this Project.

Given that in-formal meeting settings and in household environments, it is typically the male head of the household who responds to the questions, EAME's survey team also targeted areas where females could be interviewed without issue such as at a school. This resulted in large number of female's opinions being gathered and recorded in addition to the dominant male opinions.

### **Summary**

During the stakeholder engagement process, several key themes were brought up regularly:

- Overall, the Project was received positively, however, with some concerns about possible corruption, nepotism and false promises due to a history of poorly managed projects in the area;
- Community stakeholders in Umm Qasr and surrounding areas indicated that there is a strong hope that the Project will provide job opportunities for local people with varying backgrounds;
- Stakeholders indicated the hope the project may be able to positively impact/rehabilitate local services/infrastructure including roads, drinking water, electricity, sewage, refuse collection, and health care. The primary focus regarding this project was on road network rehabilitation;
- The key concerns regarding the potential negative impacts of the project focused on impacts to fishermen, air quality and roads/traffic hazards;
- Many were concerned that the consultation process continues and proposed a committee of local stakeholders be founded to engage with BMT; and
- Many stakeholders considered possible social outreach projects that could be conducted by BMT including aid to schools, local medical facilities, community projects etc.

## 6.7 Stakeholders Engaged during Final ESIA Stage

Prior to finalisation of the draft ESIA, the further stakeholder engagement was undertaken.

**Table 6.3:** Summary of stakeholder engagement activities undertaken during the final ESIA stage

Activity	Objective	Stakeholder Group
Issue of ESIA	Define identified impacts and mitigation measures.	– BMT
Issue of Non-Technical Summary (NTS)	Summaries the findings and mitigation measures identified through the ESIA	– BMT
Issue of Concise NTS via email and Social Media	Summary of the NTS translated into Arabic. Obtain feedback/input from key stakeholder groups upon the findings of the ESIA.	– Communities – Government authorities; – NGOs; – Research/Academic Organisations; and – Civil Societies.
Formal meetings	Information disclosure about the key ESIA findings and proposed mitigation measures.	– Community leadership

### 6.7.1 Methods of Consultation

Stakeholder engagement was undertaken via three main methods:

- Meeting with the Mayor of Umm Qasr;
- Engagement via social media; and
- Issue of Concise NTS to stakeholder groups.

It was intended and outlined during the ESIA process that a final stage public exhibition would be held present the draft findings of the ESIA to the local community, however, due the civil

unrest experienced through the Basra Governorate, including blocking UQP, since the summer of 2018 (see **Section 2.3**) a public event was deemed unsafe, the concern being that an event of this nature could become a flash point for further protest.

#### **Meeting with the Mayor of Umm Qasr**

A formal meeting was held with the 11<sup>th</sup> December with the Mayor of Umm Qasr. The purpose of this meeting was to:

- Outline the key findings regarding identified impacts and corresponding mitigation measures;
- Highlight mitigation measures and Project commitments already in place; and
- Present the Concise NTS;
- Obtain feedback and input prior to the final issue of the ESIA.

During the meeting, the team introduced themselves, explained the key ESIA findings and then invited comments and questions. The Mayor's office was provided with a copy of the concise NTS.

#### **Engagement via Social Media**

In lieu of a public workshop due to safety concerns, a downloadable PDF version of the Concise NTS was issued via targeted Facebook and Instagram posts. These posts targeted only those users based in the Basra Governorate. This provided individuals with the opportunity to read the NTS and to provide feedback, either via public comment or private comment through a direct message.

The level of engagement is outlined in **Table 6.4**.

**Table 6.4:** *Social media engagement*

<b>Parameter</b>	<b>Engagement Numbers</b>
Total Impressions (number of users who saw the post at least once, however, this may include multiple views by the same people)	165,792
Total Impressions – Male	147,777

Parameter	Engagement Numbers
Total Impressions – Female	17,850
Total Reach (number of users who saw the post at least once)	89,492
Total Reach – Male	78,679
Total Reach – Female	10,701
Link Clicks (number of times users clicked on the link within the post)	3,857
Link Clicks – Male	3,531
Link Clicks – Female	322

### Social Media Comments

There was a total of 12 comments made on the Facebook post. Some of these were images, one included only tags of other Facebook users, some were un-related to the material of the post and others simply acknowledged the post with an 'ok' or similar. One comment was made by a Site worker sharing details of progress whilst another said that 'Enka works well'. One user described an opportunity that they perceived the Gol to have lost in the form of a separate port type development.

## 6.8 Ongoing Stakeholder Engagement

It should be noted that for ongoing engagement, the methods of communication may vary, for example, the holding of public exhibitions may be permissible if the security situation improves. This SEP will be updated as necessary if required.

### 6.8.1 Construction Phase

During the construction phase, stakeholder engagement will be ongoing. BMT will have a designated CLO who will be responsible for day to day community engagement. This individual will be suitably qualified and tasked to:

- Act as main point of contact for the local community e.g. local group leaders and the elected and appointed local authorities;

- Disclose Project employment opportunities and key Project news and impact information, such as the commencement/completion of construction activities;
- Community consultation and disclosure events at key stages in the Project, for example at the beginning of construction;
- Organise local community meetings to provide a regular opportunity to discuss any issues or concerns;
- Receive and record written and oral comments;
- Receive and log stakeholder grievances according to the grievance mechanism;
- Dissemination of comments/meeting minutes to appropriate stakeholders; and
- Produce annual summaries that provide details related to community investment activities and the use of the grievance mechanism.

BMT will include clauses in the construction contracts to ensure that the construction subcontractor appoint their own CLO, who will report to the BMT CLO.

**Table 6.5: Proposed stakeholder engagement during the construction phase**

Stakeholder Group	Engagement Method / Form of Communication	Information to be Disclosed	Responsibility
Government - GCPI	Formal meetings and formal correspondence	<ul style="list-style-type: none"> <li>▪ Project updates</li> </ul>	BMT and construction contractor
Community Leadership	Community notice board at the site and formal and informal meetings with CLO.  Community notice board will hold the contact details of the CLO and the Community Grievance Mechanism.	<ul style="list-style-type: none"> <li>▪ Notification of construction start, proposed work areas, programme and any access issue</li> </ul>	
Communities		<ul style="list-style-type: none"> <li>▪ Community Health, Safety and Security Plan</li> <li>▪ Project updates and progress</li> <li>▪ Community Grievance Mechanism</li> <li>▪ Feedback on comments received</li> </ul>	

Stakeholder Group	Engagement Method / Form of Communication	Information to be Disclosed	Responsibility
Construction Workforce	Induction briefing and H&S notice board	<ul style="list-style-type: none"> <li>▪ OHS Plan</li> <li>▪ Worker Grievance Mechanism</li> </ul>	

Details of monitoring and reporting is presented in **Section 7**.

### 6.8.2 Operational Phase

During the operational phase, stakeholder engagement will be ongoing.

**Table 6.6:** Proposed stakeholder engagement during the operational phase

Stakeholder Group	Engagement Method / Form of Communication	Information to be Disclosed	Responsibility
Government - GCPI	Formal meetings and formal correspondence	<ul style="list-style-type: none"> <li>▪ Project updates</li> </ul>	BMT
Community Leadership	Community notice board at the site and formal and informal meetings with CLO.	<ul style="list-style-type: none"> <li>▪ Project updates (non-routine processes)</li> <li>▪ Community Health, Safety and Security Plan</li> </ul>	
Communities	Notice board will hold the contact details of the CLO and the Community Grievance Mechanism.	<ul style="list-style-type: none"> <li>▪ Community Grievance Mechanism</li> <li>▪ Feedback on comments received</li> </ul>	
Operational Workforce	Induction briefing and H&S notice board	<ul style="list-style-type: none"> <li>▪ OHS Plan</li> <li>▪ Worker Grievance Mechanism</li> </ul>	

Details of monitoring and reporting is presented in **Section 7**.

### 6.8.3 Decommissioning Phase

During the decommissioning phase, stakeholder engagement will be ongoing. A CLO will also be employed during this phase.

**Table 6.7:** Proposed stakeholder engagement during the decommissioning phase

Stakeholder Group	Engagement Method / Form of Communication	Information to be Disclosed	Responsibility
Government - GCPI	Formal meetings and formal correspondence	<ul style="list-style-type: none"> <li>▪ Project updates</li> </ul>	BMT and Decommissioning Contractor
Community Leadership	Community notice board at the site and formal and informal meetings with CLO.	<ul style="list-style-type: none"> <li>▪ Community Grievance Mechanism</li> <li>▪ Feedback on comments received</li> </ul>	
Communities	Notice board will hold the contact details of the CLO and the Community Grievance Mechanism.		
Decommissioning Workforce	Induction briefing and H&S notice board	<ul style="list-style-type: none"> <li>▪ OHS Plan</li> <li>▪ Worker Grievance Mechanism</li> </ul>	

### 6.9 Construction and Operational Roles and Responsibilities

BMT will have the overall responsibility for the majority of the pre-construction and construction related stakeholder engagement activities. As Operator, BMT will have responsibility of operational and decommissioning stakeholder engagement activities.

**Table 6.8: Roles and responsibilities for stakeholder engagement (construction and operational phases)**

Position	Reporting Line	Responsibilities
BMT Construction Project Manager	TIL and BMT management	Overall responsibility for monitoring and producing internal and external progress reports on the Project, including EHS monitoring and reporting on stakeholder engagement.
BMT Construction Health, Safety, Security and Environment (HSSE) Manager	BMT Construction Project Manager	Develop and implement the ESMP that adheres to national and international standards, taking into account recommendations in the ESIA. Prepare HSSE monitoring reports. Prepare the OHS Plan and be responsible for induction of workers in relation to this.
Subcontractor HSSE Manager	BMT Construction Project Manager BMT Construction HSSE Manager	Implement the Project EMSP. Prepare HSSE monitoring reports. Prepare the OHS Plan and be responsible for induction of workers in relation to this.
BMT Construction Human Resources Manager	BMT Construction Project Manager	Development and implementation of workplace policies, procedures, and management plans, notably recruitment, severance arrangements, skills development, training and awareness and retrenchment. Development and implementation of a contractor code of practice for environmental, safety and community management.
BMT CLO	BMT Construction Project Manager BMT Construction HSSE Manager	Act as main point of contact for the local communities e.g. local group leaders and the elected and appointed local authorities. Disclosure of Project employment opportunities and key project news and impact information, such as the commencement/completion of construction activities. Receive and record written and oral comments.

Position	Reporting Line	Responsibilities
		<p>Receive and log stakeholder grievances according to the grievance mechanism.</p> <p>Dissemination of comments/meeting minutes to appropriate stakeholders.</p> <p>Produce annual summaries that provide details related to the use of the grievance mechanism.</p>
Subcontractor CLO	BMT CLO	Support Construction Contractor CLO in the implementation of their duties
Operations Manager	BMT	Overall responsibility for monitoring and producing internal and external progress reports on the Project, including EHS monitoring and reporting on stakeholder engagement.
Operations HSSE Manager	Operations Manager	<p>Develop and implement the ESMP that adheres to national and international standards, taking into account recommendations in the ESIA.</p> <p>Prepare HSSE monitoring reports.</p> <p>Prepare the OHS Plan and be responsible for induction of workers in relation to this.</p>
Operations Human Resources Manager	Operations Manager	<p>Development and implementation of workplace policies, procedures, and management plans, notably recruitment, severance arrangements, skills development, training and awareness and retrenchment.</p> <p>Development and implementation of a contractor code of practice for environmental, safety and community management.</p>

Position	Reporting Line	Responsibilities
Operations CLO	Operations Manager	<p>Act as main point of contact for the local communities e.g. local group leaders and the elected and appointed local authorities.</p> <p>Disclosure of Project employment opportunities and key project news and impact information.</p> <p>Receive and record written and oral comments.</p> <p>Receive and log stakeholder grievances according to the grievance mechanism.</p> <p>Dissemination of comments/meeting minutes to appropriate stakeholders.</p> <p>Produce annual summaries that provide details related to the use of the grievance mechanism.</p>

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## 7 Monitoring and Reporting

### 7.1 Introduction

It is important to monitor stakeholder engagement to ensure that efforts are effective, and in particular that key stakeholders such as the local community, have been meaningfully consulted throughout the process.

### 7.2 Monitoring

Monitoring will include:

- Auditing the implementation of the SEP;
- Monitoring consultation activities conducted with government authorities and non-government stakeholders;
- Monitoring the effective of the engagement processes in managing impacts and expectations by tracking feedback received from engagement activities; and
- Monitoring any grievances received.

As outlined in **Section** Error! Reference source not found., this monitoring will be undertaken, during the construction phase by the CLO with help from the subcontractor CLO. During the operational phase, the Operations CLO(s) will undertake this reporting.

### 7.3 Tracking

Performance will be reviewed regularly against the SEP in order to assess its effectiveness. Indicators for tracing will include:

- Materials disseminated: types, frequency and location;
- Place and time of formal engagement events and level of participation including by specific stakeholder categories and groups (e.g. women);
- Comments received;
- Numbers and types of grievances and the nature and timings of their resolution;
- Recording and tracking commitments made to stakeholders; and

- Community attitudes and perceptions based upon media reports and stakeholder feedback.

## 7.4 Reporting

### 7.4.1 Internal

Regular reports will summarise all stakeholder engagement activity and provide a summary of issues raised, how they were addressed including timeliness of responses and corrective and mitigation measures to address grievances and analysis of trends in Key Performance Indicators (KPIs). These may include:

- Total numbers of stakeholder engaged according to stakeholder category;
- Number of comments and queries received according to topic and response given;
- Issues raised and levels of support and opposition to the Project;
- Number of grievances lodged; and
- Time to resolution of grievances.

As outlined in **Section** Error! Reference source not found., the reports shall be prepared by the CLO.

### 7.4.2 External

This SEP will be reviewed on a regular basis and revised as needed to reflect completed engagement activities, project changes and where necessary be revised and confirm future engagement plans.

During construction, BMT will report regularly on Project progress, implementation of mitigation measures (if any), compliance with the Environmental and Social Management System (ESMS) and overall performance. Communities will be notified by the use of the community notice boards.

During operations, updates will be issued, however, it is difficult to predict what these may entail. These are likely to focus on non-routine activities or if there is a change to company structure or practice or project details. Communities will be notified by the use of community notice boards.

## 7.5 Stakeholder Consultation Database

A Stakeholder Consultation Database (SCD) will be developed which will formalise the stakeholder engagement process in order to ensure that all stakeholder communications are documented and that any comments, suggestions, concerns or grievances received from stakeholders are recorded, taken and addressed. The SCD can be used to analyse feedback from stakeholders which can be used to inform the ESIA and updates to the SEP.

The SCD will feed into Project's ESMP which will detail all monitoring requirements applicable regardless of phase, topic or location. Furthermore, the database will be used to store, retrieve and analyse information for all stakeholder communications and consultations

## 8 Community Liaison Officer Contact Details

### 8.1 Introduction

A CLO will be appointed to be the main point of contact for the local community.

The contact details of the CLO will be posted on the community notice board and amended if they change.

### 8.2 Contact Details

**Table 8.1:** Project CLO contact details

CLO Name	CLO Cell Number and Email address
TBC	TBC

## 9 Grievance Mechanism

### 9.1 Introduction

In accordance with IFC Performance Standard 1, a Community Grievance Mechanism needs to be developed when the possibility exists that communities may be adversely affected by a project and require a safe communications vehicle to express their concerns. The aim of such a mechanism is to receive and facilitate the resolution of grievances raised by affected communities in a transparent and balanced manner. A grievance is a complaint that someone has about the activities of the Project.

Key requirements for developing and implementing a grievance mechanism are as follows:

- IFC Performance Standard 1 – “the client will establish a grievance mechanism to receive and facilitate resolution of the affected stakeholders’ concerns and grievances about the client’s environmental and social performance”;
- IFC Performance Standard 2 – “The client will provide a grievance mechanism for works...to raise reasonable workplace concerns using an understandable and transparent process that provides feedback to those concerned”; and
- IFC Performance Standard 4 – “A grievance mechanism should allow the affected community to express concerns about the Community Health, Safety and Security”.

The grievance procedure sets out the steps to be taken to resolve grievances, personnel involved and timeframes to resolve grievances. A grievance might stem from:

- A specific incident such as a road accident, spill, property damage or night time noise;
- The behaviour of personnel such as disrespectful or discriminatory actions;
- An environmental impact such as water contamination or damage to bird nests;
- A social impact such as strain on community services or loss of recreation areas; and
- Other types of impacts such as traffic, health and cultural heritage impacts.

In line with industry practice, GE will establish a Community Grievance Mechanism which aims to ensure that any grievances associated with the Project’s activities are addressed in good faith through a transparent and impartial process. This mechanism will evolve as the Project develops and through input from stakeholders.

As stated previously, details of this mechanism will be located on the community notice board at each site.

## 9.2 Objectives

The mechanism has been designed with the following objectives:

- To provide a simple, fair and transparent process for all external parties to submit feedback and to raise grievances. This shall result in outcomes that are fair, effective and lasting;
- To provide a simple process for company personnel to redress any issues and concerns raised by stakeholder in a methodical and time bound manner;
- To mitigate risks and impacts to all external stakeholder's due to Project operations, demonstrating company care for the wellbeing of its stakeholders;
- To build trust and goodwill as an integral component of the stakeholder's relation activities and promote trust and respect with stakeholders, particularly at a community level; and
- To enable for the systematic identification of emerging issues and trends, facilitating corrective and pre-emptive engagement.

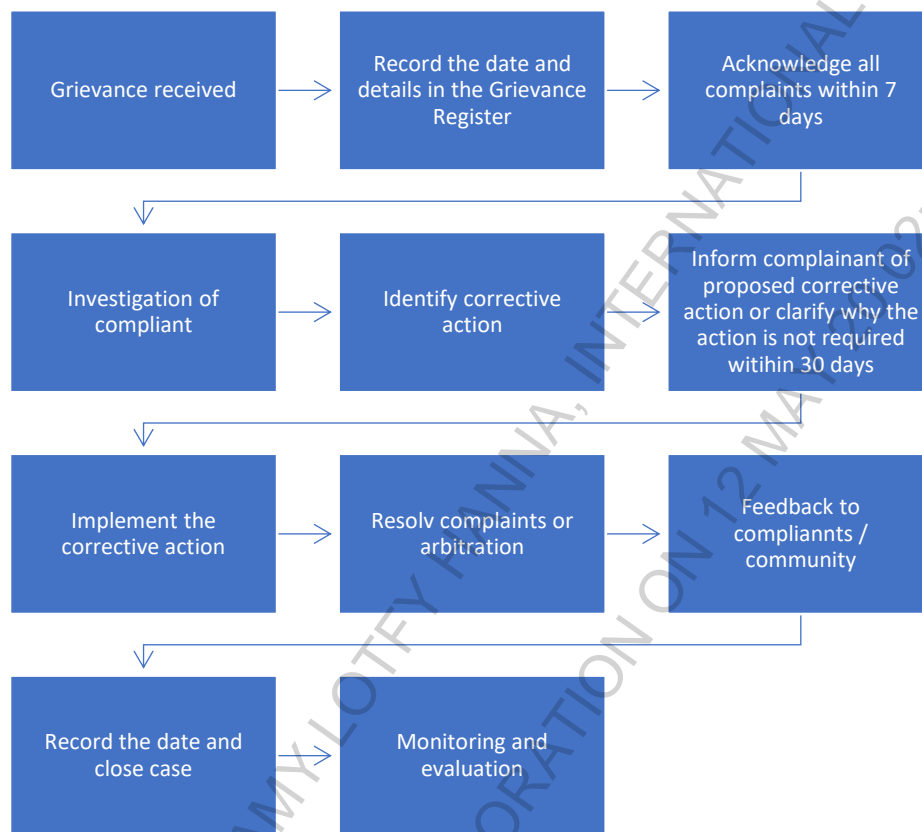
## 9.3 Process

The mechanism includes the following stages:

- Lodging a grievance:
  - Receiving and recording the grievances;
  - Acknowledgement and registration;
- Investigation and resolution;
- Response;
- Resolution outcome;
- Monitoring an evaluation; and

- Records.

The steps in the grievance process are shown diagrammatically in **Error! Reference source not found..**



**Figure 9.1:** Community grievance mechanism flow diagram

## 9.4 Lodging a Grievance

### 9.4.1 Receiving and Recording Grievances

Grievances may be lodged in a variety of different means, including by filling out a grievance form; by telephone; by email; or by hardcopy.

Once a grievance has been identified, the CLO will officially register it, and give a unique identification number and category based on the type of compliant and its severity.

The CLO should register the information in a Grievance Log book / central database, for example as shown in **Error! Reference source not found.** The Grievance Manager will ensure that the following information is recorded:

- Party name and type (Individual or Organization);
- Date the complaint was received;
- The nature of the complaint;
- Location / address of complainant; and
- Name of person that received the complaint.

Grievances will be classified in the database as the following, or similar:

- Land;
- Environmental;
- Accidental impacts;
- Health;
- Safety and security;
- Business opportunities and community investments;
- Misinformation or lack of information;
- Behaviour of Project or contractor personnel; and
- Other.

#### **9.4.2 Acknowledgement and Registration**

Once the grievance is recorded, an initial response will be sent to the party who raised the grievance within seven working days, acknowledging their grievance and describing the next steps in the grievance process, time estimates for these steps and a contact person.

PORT OF UMM QASR YARD 5 PROJECT PUBLIC GRIEVANCE FORM	
REFERENCE NUMBER:	
FULL NAME:	
CONTACT INFORMATION: <i>(Please mark how you would like to be contacted: mail, telephone, email, in person)</i>	By Post: <i>Please provide mailing address</i> By telephone: By Email:
PREFERRED LANGUAGE FOR COMMUNICATION:	
TYPE OF GRIEVANCE:	Individual: <input type="checkbox"/> Group: <input type="checkbox"/> Community: <input type="checkbox"/>
DESCRIPTION OF INCIDENCE OR GRIEVANCE:	<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>
HAS THIS GRIEVANCE BEEN RAISED PREVIOUSLY BY YOU OR ANYONE ELSE?	No <input type="checkbox"/> Yes <input type="checkbox"/> Details:
DATE OF INCIDENCE GRIEVANCE:	One time incidence/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?	
Signature: Date: Please return this form to: Community Liaison Officer <i>[Add details of contact]</i>	
ASSESSMENT CATEGORY	Compensation Land etc
GRIEVANCE ACCEPTED Yes / No	
RESPONSE/ FOLLOW UP (SUMMARY OF RESPONSE AND CORRECTIVE ACTIONS TAKEN)	
RESPONSE TO APPLICATION Date:                      Person:                      Observations:	
CORRECTIVE ACTION AND SIGN-OFF Applicant satisfied with corrective action Yes / No (Details) Is further action required No / Yes (Details) If Yes, date sign-off received from Application:	

**Table 9.1: Sample grievance tracking database**

<b>Reference Number</b>	Grievance identification number
<b>Date</b>	Date of receipt of complaint
<b>Location</b>	Location of incident
<b>Person with Grievance</b>	Name and contact details of person with grievance, including method of communication preferred
<b>Grievance</b>	Description of grievance
<b>Responsibility</b>	Person responsible for investigating
<b>Category</b>	Land etc
<b>Follow up</b>	Date to follow up or date of resolution
<b>Date of Acknowledgement</b>	Date acknowledgement provided
<b>Date of Response</b>	Date written response provided to complainant
<b>Response Details</b>	Rejected or accepted and corrective action taken / to be taken
<b>Status</b>	Pending or closed

## 9.5 Investigation and Resolution

The grievances and their surrounding circumstances will be investigated. These investigations will be undertaken in a timely manner.

The assigned individual will work with other relevant members of the Project team to investigate the problem and identify measures to resolve the grievance as appropriate. Investigations may include photographs and other evidence, witness statements, interview with affected stakeholders and other parties, and other information gathering activities; provision of information to clarify the situation, undertaking measures to remedy actual problem or compensate for any damage that has been caused either by financial compensation or compensation in-kind, and introduction of mitigation measures to prevent recurrence of the problem in the future. Where a grievance is found to be not a real problem, a clear explanation will be provided to the complainant.

The CLO will take into account the consideration of multiple grievances addressing the same and/or similar issues together, and those that may warrant additional attention.

The inspection or investigation should be undertaken within 15-20 days of receiving the grievance.

The results of these investigations will be reviewed, and a resolution will be proposed. The development of the resolution may involve consultation with the person(s) involved.

## 9.6 Response

A formal response detailing how the grievance has been resolved will be provided to each party within 30 days where possible and at the most within 3 months. Where resolution is delayed the party will be provided with a regular update on progress. The response will be in written format.

When a resolution to the grievance cannot be provided within the timescales specified, the complainant will be informed of the timescales and, when investigations have been completed, the complainant will be informed.

## 9.7 Resolution Outcome

If the resolution is accepted by all parties, it is implemented, and the grievance is closed, however, if the resolution is not accepted, it will be reconsidered, and a revised resolution may be proposed.

The affected party may choose to pursue external remedies at any time, however, GE Power-Grid Solutions is committed to fairly and collaboratively resolving grievances through the grievance mechanism wherever possible.

## 9.8 Records

All complainant documentation will be kept on record for a minimum of 2 years. A database register will be held at main site compounds.

## 9.9 Worker Grievance Mechanism

An internal Worker Grievance Mechanism will also be put in place in order to ensure that the complaints of employees are considered and resolved. This will be distinct from the community grievance mechanism and will be developed as part of the labour requirements.

## 10 References

International Finance Corporation. (2007). *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*.

Ministry of Planning. (2013). *National Development Plan 2013 - 2017*. Baghdad: Ministry of Planning.

SUPPLIED TO RAMY LOTFY HANNA, INTERNATIONAL  
FINANCE CORPORATION ON 12 MAY 20 02:33:02 GM