

APPENDIX-I

Stakeholder Engagement Plan

DHI-QAR COMBINED CYCLE GAS TURBINE POWER PLANT PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)



SEPTEMBER 2018
ANKARA



DHI-QAR COMBINED CYCLE GAS TURBINE POWER PLANT PROJECT

STAKEHOLDER ENGAGEMENT PLAN

Version	Revision	Date	Prepared by		Checked by	Approved by
Draft	A.0	March 30, 2018	Yasemin Çelikel	Elçin Kaya	D. Emre Kaya Environmental Engineer	Günel Özenirler Environmental Engineer, M.S.
			Social Impact Specialist	Sociologist		
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			Social Impact Specialist	Sociologist		
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			Social Impact Specialist	Sociologist		

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Owner:



Nile Quarter Borsaeed St.
P.O Box 3099 Baghdad –
IRAQ

Client:



General Electric
(Switzerland) GmbH
Brown Boveri Strasse
7
5400 Switzerland

Client:



ENKA UK
Construction Limited
7 HENRIETTA
STREET. C/0
REDFERN LEGAL
LLP. LONDON.
WC2E 8PS

Consultant:



international

2U1K INTERNATIONAL LTD.
PS 6 - 3rd Floor, The Meydan
Office Tower
Meydan Road, P.O. Box
450676
Dubai – UAE
☎: +90 (533) 283-6569

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LIST OF ABBREVIATIONS

2U1K	2U1K Muhendislik ve Danismanlik A.S.
Aoi	Area of Influence
ACC	Air Cooled Condensers
CCGT	Combined Cycle Gas Turbine
EIA	Environmental Impact Assessment
EP	Equator Principles
EPC	Engineering, Procurement, and Construction
ESIA	Environmental and Social Impact Assessment
FGD	Focus Group Discussions
GE	General Electric Switzerland GmbH
GT	Gas Turbine
GW	Gigawatts
HRSG	Heat Recovery Steam Generator
HSE	Health, Safety and Environment
IA	Impact Assessment
ICP	Informed Consultation and Participation
IFI	International Finance Institution
IFC	International Finance Corporation
MoE	Ministry of Electricity
MWe	mega Watt electrical
NGO	Non-Governmental Organization
OHTL	Over Head Transmission Line
OPIC	Overseas Private Investment Corporation
PS	Performance Standard
PPM	Public Participation Meeting
PRO	Public Relations Officer
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
STG	Steam Turbine Generator
UKEF	Export Credits Guarantee Department of UK Government

1 INTRODUCTION

This Stakeholder Engagement Plan (SEP) has been prepared on behalf of ENKA UK CONSTRUCTION LTD (ENKA) (the Nominated Subcontractor) as part of the Environmental and Social Impact Assessment (ESIA) process for the '*Dhi-Qar Combined Cycle Gas Turbine Power Plant Project*' (hereinafter 'the Project').

ENKA UK Construction Ltd. (ENKA) and General Electric Switzerland GmbH and Alstom Middle East Iraq (collectively referred to as "GE") plan to develop and construct the Project which will have a nameplate capacity of 750 MW. The Plant will be the first combined cycle project of that will be owned and operated by Ministry of Electricity (MoE) of Iraq, also known as the Project Employer.

The SEP has been prepared in accordance with the Performance Standards (PS) of the International Finance Corporation (IFC) (i.e., PS1 Assessment and Management of Environmental and Social Risks and Impacts) and the common social policy and corporate principles of the sponsors of the Project.

In accordance with international good practice, the purpose of the SEP is to:

- ensure a technically and culturally appropriate approach to engagement with all key stakeholders;
- ensure the adequate and timely sharing of information with affected stakeholders and other interested parties;
- provide sufficient opportunity for stakeholders to express their opinions and concerns; and
- ensure that these concerns are incorporated into project decision-making processes during all stages of the project lifecycle.

This SEP includes; (i) the identification of stakeholders for the Project, (ii) analysis of relationships of the stakeholders with the Project, (iii) details of consultation methodologies, (iv) activities carried out to-date and those planned for the future stages of the Project, (v) details of the process for managing stakeholders' concerns and grievances, and explains how the stakeholder engagement process will be recorded, monitored, evaluated and reported.

The Project Subcontractor owns this SEP, which is committed to and accountable for its implementation.

2 PROJECT DESCRIPTION

2.1 Project Overview

The Project will be located near Nasiriyah City in Dhi-Qar Governorate, 200 km northwest of Basra, in Southern Iraq. An area of approximately 30 ha has been allocated for the Project by the MoE. The Project is planned as a two-phase development.

In Phase 1, the Power Plant will be constructed as a simple cycle power plant, which will include four Gas Turbines and will have a total capacity of 500 MW. In Phase II, a Steam Turbine and four Heat Recovery Steam Generators (HRSG) with a capacity of 250 MW will be added to the Project.

The Gas Turbines have been purchased by MoE as part of a Mega-Deal between the Government of Iraq and GE. GE will serve as Engineering, Procurement, and Construction (EPC) Contractor and ENKA (GE's Nominated Subcontractor) will be responsible for installing and commissioning the Project. After commissioning MoE will own and operate the Project.

The Employer plans to apply to International Financial Institutions namely Overseas Private Investment Corporation (OPIC) and Export Credits Guarantee Department of UK Government¹ (UKEF) for potential project financing. Consequently, the Project is committed to follow OPIC Environmental and Social Policy Statement, relevant national environmental legislation and regulations and international environmental and social guidelines and standards, including, but not limited to, International Finance Corporation (IFC) Performance Standards (PS) and Guidelines of the World Bank Group. On behalf of the Employer, GE and ENKA have retained 2U1K International Limited to prepare this Environmental and Social Impact Assessment (ESIA) report to be submitted the potential lenders.

Site mobilization for the Project was started in August 2017. Phase1 of the Project is planned to be completed in 16 months, including the last 4 months for commissioning. Phase 2 will start during the last 4 months of Phase I and is expected to be completed in 34 months including the last 4 months commissioning.

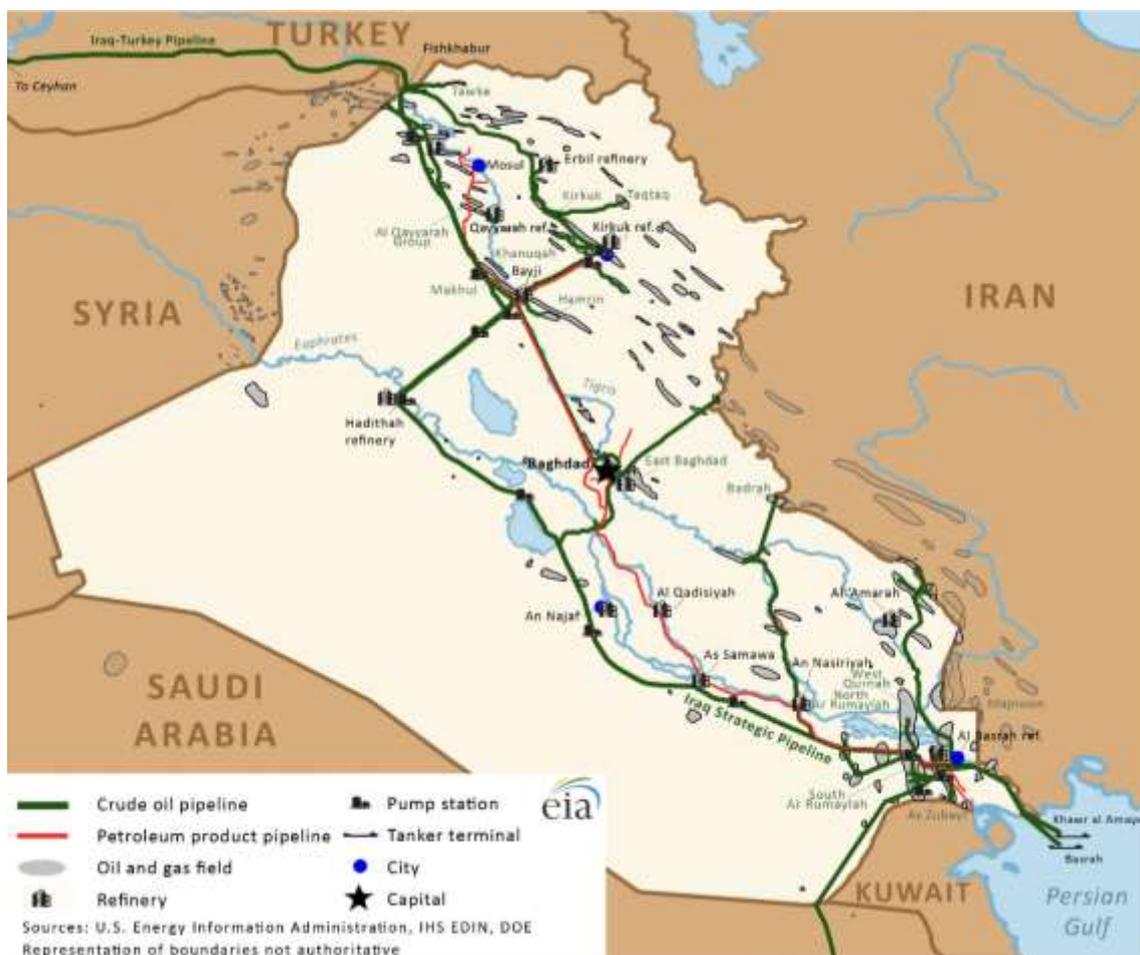
As of now, the design life of the Power Plant is expected to be 25 years. The financing of the Project shall be arranged by Overseas Private Investment Corporation (OPIC) and Export Credits Guarantee Department of UK Government² (UKEF) which require ESIA to be prepared in accordance with the "IFC Performance Standards and Guidelines of the World Bank Group" and in accordance with the Iraqi Environmental Legislation.

¹UK Export Finance (UKEF) determines whether applications for support fall within the scope of the OECD Common Approaches and Equator Principles for funding. If so, UKEF then categorizes projects and benchmarks Environmental, Social, Human Rights (ESHR)

² UK Export Finance (UKEF) determines whether applications for support fall within the scope of the OECD Common Approaches and Equator Principles for funding. If so, UKEF then categorizes projects and benchmarks Environmental, Social, Human Rights (ESHR)

2.1.1 Project Rationale

The U.S. Energy Information Administration’s Country Analysis Brief for Iraq, which was last updated on April 28, 2016, indicates that Iraq is the second-largest crude oil producer in the Organization of the Petroleum Exporting Countries (OPEC) after Saudi Arabia, and it holds the world’s fifth-largest proved crude oil reserves after Venezuela, Saudi Arabia, Canada, and Iran. Most of Iraq’s major known fields are producing or in development, although much of its known hydrocarbon resources have not been fully exploited. Iraq was the world’s fourth-largest natural gas-flaring country in 2014, as more than half of its gross natural gas production was flared. Natural gas is flared because of insufficient pipelines and other infrastructure to transport and store it for consumption and/or export. Iraq’s oil and natural gas infrastructure is presented below in Figure 2-1.



Source: Iraq Energy Outlook, International Energy Agency, October 2012

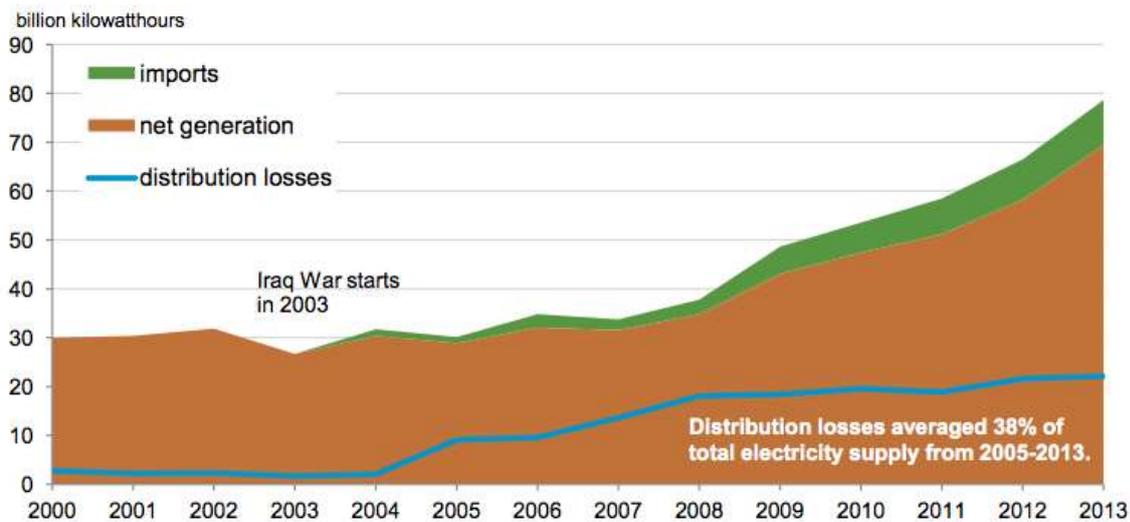
Figure 2-1 Iraq’s Oil and Natural Gas Infrastructure

Iraq’s economy heavily depends on oil revenues, such that crude oil export revenues accounted for 93% of Iraq’s total government revenues in 2014, according to the International Monetary Fund (IMF). In 2015, Iraq (excluding the Kurdistan Regional

Government) earned less in crude oil export revenues, compared to the earnings in 2014, despite a substantial increase in export volumes. The expansion of onshore pumping and storage infrastructure in the south, improvements in crude oil quality as Basra Light and Basra Heavy were marketed separately starting in mid-2015, and an increase to the Kurdistan Regional Government’s (KRG) pipeline capacity in the north all contributed to the production growth in Iraq (U.S. Energy Information Administration (EIA), 2016).

Large-scale increases in oil production would also require large increases in electric power generation. Like many developing countries in the Middle East and North Africa, Iraq faces a sharply rising demand for power. Iraq has struggled to meet its power needs during the Iraq war and for the postwar period, with shortages common across the country. Although Iraq’s electricity generation capacity has increased, electricity generation expansion has slowed because of the economic crisis in the wake of the war against the Islamic State of Iraq and the Levant (ISIL) in northern Iraq that began in mid-2014 and low oil prices (U.S. Energy Information Administration (EIA), 2016).

Iraq’s electricity supply totaled almost 79 billion kWh in 2013, of which more than 69 billion kWh was generated through the domestic power plants and more than 9 billion kWh was imported from Iran and Turkey. Electricity net generation in Iraq grew by an annual average of 15% from 2009 to 2013, recovering from the 2003 dip in electricity generation associated with the start of the Iraq war. Although electricity net generation in Iraq has increased from 2009 to 2013, distribution losses have also increased. From 2005 to 2013, distribution losses averaged 38% of the total electricity supply. Iraq’s distribution system, outside the Iraqi Kurdistan Region, has deteriorated because of poor design, lack of maintenance, and electricity theft, resulting in large distribution losses, low voltage levels, and frequent disconnections. The electricity net generation, imports and distribution losses in Iraq are demonstrated in Figure 2-2 below (U.S. Energy Information Administration (EIA), 2016).



Source: Country Analysis Brief for Iraq, U.S. Energy Information Administration, April 2016

Figure 2-2 Electricity Net Generation, Imports and Distribution Losses in Iraq

The U.S. Energy Information Administration's Country Analysis Brief for Iraq states that peak summer demand has typically exceeded actual generation by almost 50%, causing power shortages, particularly in southern Iraq, referring to a website article published in 2011. It further indicates that Iraqi households and businesses must rely on expensive off-grid, private diesel-fueled generators to address the shortfall, with those in Baghdad alone providing an additional 1 GW of capacity, referring to a website article published in 2012. A study of Iraq's electricity sector shows that about \$40 billion in revenue is lost each year because the country lacks the electricity supply needed to stimulate more business activity from various economic sectors, including agriculture, commerce, and tourism.

Iraq set aggressive targets in the past to increase electricity generation, but actual outcomes have fallen short. Iraq's Ministry of Electricity's master plan set a target to install 24.4 GW of new generating capacity between 2012 and 2017. The plan is similar to Iraq's Integrated National Energy Strategy (INES), released in 2013. INES proposed to increase generation capacity in Iraq (outside of the Iraqi Kurdistan Region) by 22 GW in 2016 from 7 GW in 2012 by adding steam and natural gas turbines that can run on fuel oil in case of natural gas shortages. The additional 22 GW in 2016 was the estimated amount needed to meet summer peak demand, which includes a 15% reserve margin. Iraq planned to spend at least \$27 billion by 2017 on developing its electricity sector, with about half of the funding earmarked to upgrade the transmission and distribution systems. Iraq also anticipated to stop importing electricity by the end of 2016 if these expansions are made. However, Iraq is behind schedule on the electricity plan. The ISIL offensive that started in mid-2014, along with the sustained low oil prices, has squeezed Iraq financially, slowing down the plans to reduce power shortages and decrease electricity imports (U.S. Energy Information Administration (EIA), 2016).

Several different approaches have been used in order to achieve a rapid build up of Iraq's power generation capacity. In 2008, the Ministry of Electricity procured a large number of gas turbines under so-called "Mega Deals" from GE and Siemens.

Dhi-Qar CCGT Power Plant is one of the new power plants that will be established under the contract between GE and the Ministry of Electricity, where GE will help supply turbines and other equipment as well as provide aid with engineering, procurement and construction (Egan, 2017).

2.2 Project Location

The Project will be established in Nasiriyah City in Dhi-Qar Governorate, 200 km northwest of Basra, in Southern Iraq. The Project will be located on a rural area of 30 ha which is owned by the Governorate and has been allocated to MoE for Project purposes. Power Plant will cover an area of 294,281 m².

Table 2-1 shows the coordinates of the Project Site.

Table 2-1 Coordinates of the Project Site

Node	East	North
C1	612850	3433729
C2	612863	3433287
C3	613650	3433657
C4	613662	3433363

Source: Project Employer.

Project Site is surrounded by the Primary Road No. 7 to the north, the Baghdad- Basra railway to the south and a 400 kV transmission line to the west. The Nasiriyah Thermal Power Plant is located less than 1 km to the south of the Project and the Dhi-Qar Refinery is located approximately 4.7 km to the south east to the Project site.

The closest settlements to the Project are the villages of Al Auejah (0.5km to the south), Al Mahmud (1.5km to the north east), Al Agir (2km to the west) and Al Sadah (2.5km to the west).

It is important to note that the land to be taken in the context of the Project Site for the construction of the Power Plant are property of Government. There are no private settlements within the Project Site. Therefore, there will be no need to take mitigation measures for economic or physical displacement.

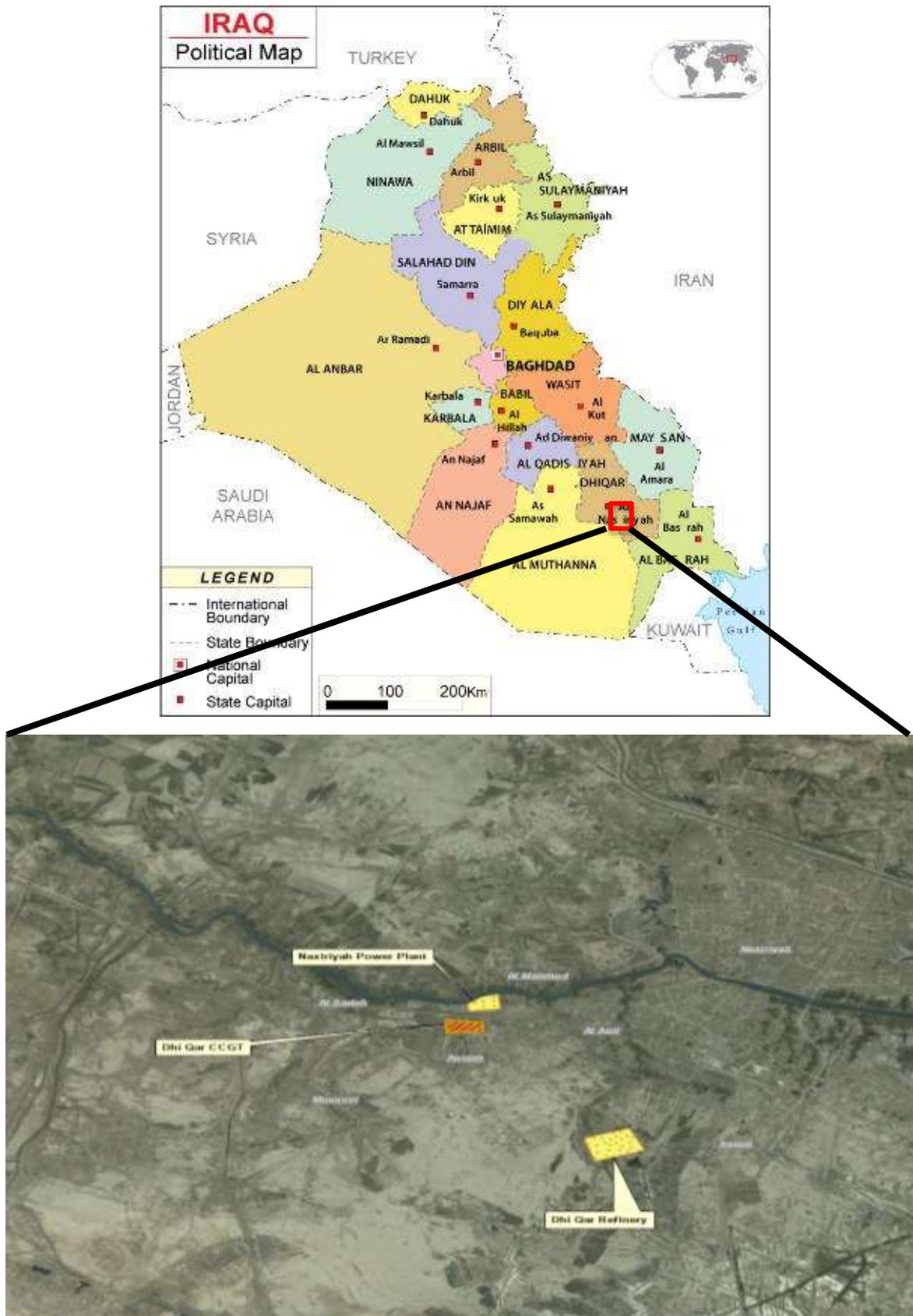


Figure 2-3 Location of the Project Site

2.2.1 Area of Influence

The Area of Influence (Aoi) is determined by considering the impacts related to transportation activities, the hiring and use of laborers during construction and operation of the Project, , noise generated during construction and operation of the Project, land use, dust generation and air quality impacts related to construction and operation activities..

The nearest settlements to the Project Site will be considered as the first impact zone. In other words, locals in the first impact zone may experience direct impacts from the Project. Excavation and construction works will cause dust and noise emission, in which Aujeah (distanced 0.5 km to the Project Site) and Al Mahmud (distanced 1.5 km to the Project Site) may experience dust and noise impacts during the construction phase of the Project. Therefore, first impact zone includes the Aeujah and Al-Mahmud villages which are within a 2 km radius around the Project Site.

The second impact zone includes the Al-Agir and Al-Sayeh villages, which are within a 5 km radius of the Project site. Inhabitants' within the second impact zone may experience indirect Project impacts such as direct and indirect job opportunities, providing goods and services to the Project and Project employees. Inhabitants in the first impact zone are more likely to experience impacts related to community health and safety than inhabitants located in the second impact zone. Further information on these impacts can be found in Section 6.5 (Impacts on Social Environment) of the ESIA Report.

Nasiriyah Central Prison, located 3.5 km away from the Project Site will also be taken into consideration as an Aoi during the assessment of social impacts of the Project.

As stated, the allocation of the Project Site causes no land acquisition. Therefore there will be no need to take mitigation measures for economic or physical displacement for the allocated Site. However, during the Public Participation Meeting (PPM), the locals raised their claims on how they used the Project Site for agricultural purposes. This matter was evaluated by the experts during the ecological site surveys to assess whether if there is a recent history of agricultural activities conducted by the locals. According to field surveys conducted by experts, there is no evidence of agricultural activity in the Project area, because of the high concentration of salt found in the nearby marshed, which eventually contributed to low crop yields. As a conclusion, there was no evidence found in terms of locals occupying the Site for agricultural purposes.

As for the associated facilities, there will be no private land allocation. According to official letter from the MoE on January 25, 2018, land ownership of the areas of OHTL, access roads and fuel pipelines belong to the Government of Iraq.

3 REGULATORY REQUIREMENTS

This section outlines the regulatory framework for the Project's stakeholder engagement activities, namely:

- the legislative requirements of Government of Iraq,
- the IFC Performance Standards;
- the Equator Principles;
- Overseas Private Investment Corporation Environmental and Social Policy Statement;
- gaps between Iraqi legislation and international standards.

3.1 National Legislation

The Law on Environmental Protection and Improvement (No. 27 of 2009) is the primary environmental legislation in Iraq. Chapter 4 of the Law specifies a number of detailed provisions that investment projects are subjected to comply.

Article 10 of Chapter 4 of the Iraqi Law on Environmental Protection describes the need for an EIA prior to the commencement of a Project.

According to Article 10, an EIA must include the following:

- Determine the positive and negative impacts of the project on the environment and the impact on the surrounding environment;
- Detail the proposed methods to avoid and treat the causes of pollution in order to achieve compliance with environmental regulations and instructions;
- Propose contingencies for pollution emergencies and potential precautions;
- Detail possible alternative technology that is less harmful to the environment and the rational use of resources;
- Detail provisions to reduce and recycle waste, where possible; and
- Provide an assessment of the environmental feasibility of the project and an estimate of the cost of pollution relative to production.

The EIA must assess the environmental feasibility of the project and estimate the cost of pollution relative to production.

National EIA process does not require Project to conduct public participation meeting nor requires any footsteps to engage with possible stakeholders of the Aol.

3.2 Lender Guidelines

3.2.1 IFC Performance Standards

Since the IFC is a potential lender for the Project, the Project must align with good international practice, including the IFC Performance Standards (PS) and Guidance Notes of 2013. IFC as the potential major lender categorized this large-scale energy Project as a Category “A” project under Guidance Notes. Key principles, requirements, methodological and procedural aspects of the stakeholder engagement process for IFC Category A projects financed by IFC are described in detail in the IFC 2007 “A Good Practice Handbook for Companies Doing Business in Emerging Markets”. Specific objectives of Stakeholder engagement are outlined in Box 3-1. The project could result in potentially significant and diverse adverse future environmental and social impacts and issues which cannot readily be identified or assessed and which require a formalized and participatory assessment process carried out by independent consultants in accordance with the PSs. The approach to the ESIA and stakeholder engagement for the Project is therefore, designed accordingly.

Box 3-1 Specific Objectives of the IFC Standards Regarding Stakeholder Engagement

IFC PS:1 Stakeholder Engagement
<p>Stakeholder Engagement: According to IFC PS-1 Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities. The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project’s risks and adverse impacts, and the project’s phase of development.</p> <p>Stakeholder Analysis and Engagement Planning: Clients should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders. The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities.</p> <p>Disclosure of Information: Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. The client will provide Affected Communities with access to relevant information.</p> <p>Consultation: When Affected Communities are subject to identified risks and adverse impacts from a project, the client will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them. The extent and degree of engagement required by the consultation process should be commensurate with the project’s risks and adverse impacts and with the concerns raised by the Affected Communities.</p> <p>Informed Consultation and Participation: For projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation (ICP) process that will build upon the steps outlined above in Consultation and will result in the Affected Communities’ informed participation.</p> <p>External Communications and Grievance Mechanisms: Clients will implement and maintain a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability. Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected Communities’ concerns and grievances about the client’s environmental and social performance.</p>

3.2.2 Equator Principles

The Eps are a risk management framework, adopted by financial institutions, for determining, assessing and managing environmental and social risk in projects. They can be used as a benchmark of international good practice. The Equator Principle 5 has an engagement specific requirement of relevance to the SEP as “projects with potentially significant adverse impacts on Affected Communities will conduct an Informed Consultation and Participation process. The borrower will tailor its consultation process to the language preferences of the Affected Community, their decision-making processes, and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.” (Equator Principles, 2012). Specific objectives of Stakeholder engagement are outlined in Box 3 – 2.

Box 3-2 Specific Objectives of the Equator Principles Regarding Stakeholder Engagement

EP Principle – 5: Stakeholder Engagement
<p>For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective Stakeholder Engagement as an on-going process in a structured and culturally appropriate manner with Affected Communities and, where relevant, Other Stakeholders. For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to: the risks and impacts of the Project, the Project’s phase of development, the language preferences of the Affected Communities, their decision-making processes and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.</p> <p>To facilitate Stakeholder Engagement, the client will, commensurate to the Project’s risks and impacts, make the appropriate Assessment Documentation readily available to the Affected Communities, and where relevant Other Stakeholders, in the local language and in a culturally appropriate manner.</p> <p>The client will take account of, and document, the results of the Stakeholder Engagement process, including any actions agreed resulting from such process. For Projects with environmental or social risks and adverse impacts, disclosure should occur early in the Assessment process, in any event before the Project construction commences and on an on-going basis.</p> <p>EPFIs recognize that indigenous peoples may represent vulnerable segments of project-affected communities. Projects affecting indigenous peoples will be subject to a process of Informed Consultation and Participation, and will need to comply with the rights and protections for indigenous peoples contained in relevant national law, including those laws implementing host country obligations under international law. Consistent with the special circumstances described in IFC Performance Standard 7 (when relevant as defined in Principle 3), Projects with adverse impacts on indigenous people will require their Free, Prior and Informed Consent.</p>

3.2.3 Overseas Private Investment Corporation (OPIC)

The OPIC’s Environmental and Social Policy Statement was first published in 2010 to provide the applicants with the general environmental and social requirements that OPIC applies in evaluating prospective projects seeking OPIC support. On January 13, 2017 OPIC updated the Environmental and Social Policy Statement.

This Policy Statement adopts, as a standard for the environmental and social review process, the IFC’s Performance Standards (PSs) on Social and Environmental Sustainability.

As stated in the Environmental and Social Policy Statement;

“Projects are required to develop and implement a Stakeholder engagement plan tailored to project risks and impacts in accordance with the requirements of Performance Standard 1.

Applicants must meet the requirements of the Performance Standards, and host country laws, regulations and standards related to public consultation and disclosure of information. In order to more effectively manage risks and impacts of projects, all Applicants are required to engage Project Affected People through

- 1) disclosure of information,*
- 2) meaningful Consultation and*
- 3) development and implementation of systems for responding to complaints and grievances commensurate to the level of social risk.*

The nature, frequency and level of effort of this engagement will be commensurate with the project's risks and impacts and the project's phase of development" (Overseas Private Investment Corporation, 2017).

3.3 Gaps between Local Legislation and International Guidelines

The most prominent topic which requires further elaboration in national EIA legislation is "Social Impact Assessment (SIA)". Additional studies and implementations are required in this topic for internationally financed projects to achieve alignment with international standards. For example, implementation of detailed socio-economic surveys at Project Site and the establishment of a Grievance Mechanism are not stipulated by the national EIA legislation. However, these are required by international standards.

All these requirements will be considered and fulfilled within the scope of the Project.

4 ROLES AND RESPONSIBILITIES

The Project Subcontractor will make sure that all affected parties, particularly affected settlements and local authorities are informed about the Project and will be involved in the process of identifying the important issues of the Project. Roles and responsibilities have been defined in order to ensure effective stakeholder engagement during the life of the project.

Principal roles and responsibilities for the implementation of this plan during the construction phase are outlined in Table 4-1 below.

Table 4-1 Connection of Stakeholders to the Project

Roles	Responsibilities
Site Manager	Ensures that this SEP is implemented Provides necessary resources for effective implementation of this Plan Coordinates with parties for effective implementation of this Plan
HR & Administration Manager Grievance Officer	Implements and improves this SEP Determines necessary resources for effective implementation of this SEP and submits to his line managers Evaluates the compliance of Project activities with national and international legislation requirements , Searches the causes of the social incidents that cause; injuries, delays or stoppage in the work and disputes among Project and communities Monitors all grievances and ensure that all complaints are resolved and closed, Coordinates with parties for proper implementation of this SEP
Security Manager Site EHS Manager HSE Manager Construction Manager	Implements this Plan Organizes cooperation activities with employees Reports grievances, which are received or observed verbally, to Project Manager, Fills out a Complaint & Consultation Register Form Investigates and proposes appropriate methodology for resolving the grievance, Conducts follow ups for the results of complaints and reports on weekly, monthly and annual basis to the Management,

5 PROJECT STAKEHOLDERS

For the purposes of this SEP, a stakeholder is defined as any individual, organization or group which is potentially affected by the Project or which has an interest in the Project and its impacts. The objective of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - (“affected parties”), or have an interest in the Project (“other interested parties”).

It is important that particular effort is made to identify any disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the Project or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an on-going process and will require regular review and update.

5.1 Stakeholder Identification and Categorization

In order to develop an effective SEP, it has been necessary to determine exactly who the stakeholders are and understand their priorities and objectives in relation to the Project. By classifying stakeholders, it has been possible to develop a plan that is tailored to the needs of different stakeholder groups. Different issues are likely to concern different stakeholders and so different types of stakeholders have been grouped based upon their relations to the Project. Having an understanding of the relations of a stakeholder group to the Project helps identify the key objectives of any engagement. Table 5-1 illustrates how each stakeholder is connected to the Project.

Table 5-1 Connection of Stakeholders to the Project

Stakeholder Groups	Stakeholder Type		Connections to the Project
	Affected Party	Other Interested Party	
Local Communities			
<ul style="list-style-type: none"> • Mukhtar³ of Aujeah Village • Sheikh⁴ of Aujeah Village • Residents of Aujeah Village • Mukhtar of Al-Sayeh Village • Sheikh of Al-Sayeh Village • Residents of Al-Sayeh Village • Mukhtar of Al-Mahmud Village • Sheikh of Al-Mahmud Village • Residents of Al-Mahmud Village • Mukhtar of Al-Agir Village • Sheikh of Al-Agir Village • Residents of Al-Agir Village 	√		Households and communities that will receive impacts (positive or negative) as a result of the Project – e.g. positive employment opportunities, provision of infrastructure services or negative impacts associated with dust and noise.

³ Mukhtar is the head of a village or neighborhood in many Arab countries. Mukhtars are usually selected by some consensual or participatory method, often involving an election.

⁴ Sheikh commonly designates the ruler of a tribe or community who, usually, inherited the title from his father. Sheikhs are also known as religious leader of their community.

Stakeholder Groups	Stakeholder Type		Connections to the Project
<ul style="list-style-type: none"> Users of local public amenities Employees of surrounding government institutions and public amenities 			
Government			
<ul style="list-style-type: none"> Ministry of Electricity Ministry of Oil Ministry of Environment Ministry of Transportation 	√		<ul style="list-style-type: none"> Ministry of Electricity is the Employer of the Project. Also, all permits and land allocation outside of Project Site is provided by the MoE. The Ministry of Oil will provide fuel gas connection to the gas pipeline as well as crude pipeline to the Project Site. The Ministry of Environment is the governmental institution concerned with implementing the state's Environment Protection and Improvement policy, and has assumed this task since its creation in 2003 as a natural development reflecting the deep understanding and attention of the Government of Iraq attaches to environment and responding to the urgent need to practice environmental work in order to face the grave environmental challenges and problems.
Local Administrations			
<ul style="list-style-type: none"> Dhi-Qar Governorate 		√	Local government of primary political importance to the Project with permitting requirements that must be met by the Project and responsibilities for waste management, infrastructure and traffic management. The Project Subcontractor will have to work in cooperation with the local administration bodies.
Employees			
<ul style="list-style-type: none"> Construction Staff MoE 	√	√	The construction and operation of the Project will require substantial labor effort and employment. It is planning to be employed approximately 1500 people in the construction phase

6 STAKEHOLDER ENGAGEMENT APPROACH

6.1 Overall Approach

The Project will maintain on-going engagement with the national authorities, affected stakeholders and other interested parties to ensure that they are informed about the Project’s progress, that they receive information on the environmental and social performance, that they can provide feedback on the effectiveness of any mitigation and management measures and that they have the opportunity to raise any concerns or grievances.

Engagement has been, and will continue to be, undertaken in four successive phases, based upon typical project planning and implementation phases. These phases and the key activities conducted or to be conducted during the engagement process, are detailed in Table 6-1.

Table 6-1 Stakeholder Engagement Objectives and Activities

Phase	Objectives	Key Activities
Phase 1: Initial Engagement	<ul style="list-style-type: none"> To introduce the Project to the affected and interested stakeholders. To identify key stakeholders to be consulted. To generate feedback on the scope, approach and key issues for the ESIA. To generate feedback on the Scoping Report. 	<ul style="list-style-type: none"> Secondary data analysis to identify key stakeholders. Identify vulnerable groups, if possible, Meetings are held with relevant government stakeholders. Meetings are held with community leaders (Mukhtars and Sheikhs). And distribution of Project Description leaflets to the interested parties during the PPM (which was conducted on September 2017).
Phase 2: Impact Assessment	<ul style="list-style-type: none"> To introduce the Project where necessary. To inform and validate the baseline data through semi-structured interviews and questionnaires. To generate feedback on Project activities and have specific discussions regarding potential impacts and proposed mitigation/enhancement and monitoring measures. To manage local expectations, concerns and any misconceptions. To enable stakeholders to input into the Project design and management plans. 	<ul style="list-style-type: none"> In-depth interviews and Semi-structured interviews were held with selected stakeholders. In depth or Focus Group Discussions with vulnerable groups, when necessary.

Phase 3: IA Disclosure	<ul style="list-style-type: none"> To make the final ESIA available to all interested and affected stakeholders. Project design and management plans. 	<p>On completion of the disclosure and comment period, the ESIA Report will be updated to reflect the results of consultation and comments will be fed into the future work on detailed design and construction of the Project. The Final ESIA and its appendices will then be made available to public.</p> <p>Address: Ministry of Electricity of Iraq, General Directorate for Gas Power Plants Projects Nile Quarter Borsaeed St. P.O Box 3099 Baghdad – IRAQ</p> <p>The Second Public Participation meeting will be arranged accordingly.</p>
Phase 4: Project Implementation	<ul style="list-style-type: none"> To ensure all affected and interested stakeholders are informed about project progress and have the opportunity to raise any concerns or grievances. To receive feedback on the effectiveness of mitigation and management measures. To manage grievances. 	<ul style="list-style-type: none"> Project updates and progress information are made available to all affected and interested stakeholders via Mukhtars' or Sheikhs and other public places. On-going maintenance and availability of the Grievance Procedure are carried out.

Table 6-1 below outlines the stakeholders and engagement approach to be applied for the Construction and Operation phases.

Table 6-2 Stakeholder Engagement Approach

Stakeholder	Topics	Frequency	Method and Materials	Lead and Supporting Responsibility
Local Communities	Update of Project activities and progress Employment process Land Acquisition	Monthly	Informal / Formal face-to-face meetings Written Project brochures/ Posters updates Corporate website Grievance mechanism	Operational Manager Administrative Unit
Local Authorities Local Media	Update of Project activities and progress Local procurement and employment data.	Quarterly	Meetings / Visits Written Project brochures/updates Corporate website Grievance mechanism	Operational Manager Administrative Unit
Project Employees	Update of Project activities progress and planning	Yearly	Internal Workshops Corporate website Written Project brochures/updates	EHS Team Operational Manager
Private Sectors	Update of Project activities progress and planning	Yearly	Corporate website Written Project brochures/updates Media advertisements	Operational Manager Administrative Unit

7 Stakeholder Engagement Tools

A range of tools was used and will continue to be used for the stakeholder engagement as part of this Project. These include household surveys, focus groups, community level questionnaires, leaflets and key informant discussions. Stakeholder engagement will continue using these employed mechanisms as required ensuring efficient and effective engagement throughout the life of the project.

Specific methods will vary across different stakeholder groups and stakeholder engagement with vulnerable and minority groups will use specifically designed mechanisms, as needed. The majority of the vulnerable groups in the Aol comprise low income groups, daily workers and people who have physical and mental disabilities.

Project representatives will be present at key community engagement and information sharing events to demonstrate company commitment to stakeholder engagement, to build relationships and to answer any questions. Information will be presented that is culturally appropriate and easy to understand, using graphics and maps, wherever possible.

Project has and will continue to use the following methods for engaging with stakeholders:

- Informal / Formal face to face meetings – likely to be the primary form of on-going consultation during the construction and operation phase.
- Project Brochure/Updates - Project Brochure initially used as part of the PPM process. This will be updated to provide up to date construction progress info and will be used as on-going communication tool.
- Project Subcontractor's website – publically available site for project announcements, documents, reports, etc.
- Grievance mechanism – aimed particularly at directly affected stakeholders. Mechanism has been and will continue to be widely disclosed to affected public.
- Media advertisements – invitations to participate in meetings, information disclosure, etc.

In order to ensure that the Project reaches all stakeholders, the Project will utilize a range of mentioned communication tools. These are described in more detail below.

7.1.1 Project Brochures

A brochure for the Project has been developed and includes information about the Project in detail. Also, the brochure outlines the environmental and social impact assessment process and provide contact information (email, phone, postal address and fax) for the Public Relations Department of the Project Subcontractor for any grievances. See Annex 4 for the Project Brochures in English and Arabic, respectively.

7.1.2 Project Website

Project Subcontractor has a corporate level website and it contains general Project description (for details see: <http://www.enka.com/portfolio-item/dhi-qar-750-mw-combined-cycle-power-plant/>). ESIA report and SEP documents will also be disclosed at the website of the lender.

7.1.3 Grievance Mechanism

A grievance mechanism will be developed which will allow stakeholders to raise concerns or complaints personally as well as via post or electronic mail (contact details in *Section 7.1.4*). The procedure seeks to address concerns promptly and be readily accessible to all affected stakeholders. The project team will confirm the obtainment of a complaint within 7 days and find a resolution within 14 days, confirming this in writing to the complainant. A separate formal grievance mechanism will also be developed for those employed on the Project.

7.1.4 Public Relations Officer (PRO)

In order to maintain regular communication with affected communities, a Public Relations Officer (PRO) has been assigned by the Project Employer. The PRO⁵ will be responsible for identifying, informing and recording public views and opinions and for relaying them to the necessary person for follow up (as detailed in the grievance mechanism in Chapter 10).

Contact details for this office are:

- **Name:** Mr. Muwafaq Yousif Azeez
- **Tel:** +964 782 786 5242
- **Mail:** nassiriyah1@yahoo.com / nasiriah@gppproject.moelc.gov.iq

⁵ To address current gender limitations of the Project, suggestions notes regarding the PRO management system has been addressed in the Grievance Mechanism section of this Report

8 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

8.1 Social Baseline and Impact Assessment

8.1.1.1 Limitation

The social team was gathered for the purposes of both conducting household surveys and Public Participation Meetings (PPM) combined with female staff from the locals of the Dhi-Qar Region. When the possibility of ‘female only’ participation meeting was sought from the head of villages, it was objected. This is highly related to the religious and cultural conservatism of the region, approaching local women is a quite sensitive matter in the region; therefore, no female participants attended in the PPM or were interviewed one-on-one with the female field staff for the sake of household surveys.

Especially, the field team attempted to include female locals for the baseline studies through seeking permission from the head of villages or directly seeking permission from the women in the village, however, as stated due to the nature of the cultural conservatism of the region, it was observed to be inappropriate to insist any further, as the women themselves in the villages rejected to be involved when asked by the female field staff directly during the household survey studies.

This attitude was not result of locals being opposed to the Project in general, in fact, according to the head of villages and observations through the PPM show that the locals do not have any objections against the Project, the locals were simply opposed to the idea of the field team interacting with the local women, as it seemed to not fit the social cohesion of the region. It is important to note that, the locals in general expected their cultural norms and religious codes to be respected by the field team.

The second limitation is on the Nasiriyah Central Prison. Nasiriyah Central Prison is located within the borders of AoI. Although the main intension of the social experts was to include detailed information of the Prison in the ESIA Report, especially in terms of capacity, type of inmates and any recent incidents (if any). However, almost no information has been obtained about the Prison throughout the field study from the locals as well as the local authorities.

During the field study, the social team asked further information on the Prison to the Governor of Dhi-Qar and the head of villages as well. Security in general is quite sensitive subject of the region and further information on State prisons such as capacity, recent incidents (i.e. escapes) or type of prisoners were not provided to the social team when asked. Only statement was that there had been no recent incidents within the Prison borders and further information was not allowed to be provided due to national security purposes. However, both from the desktop study and field observations, no recent incidents within or around the Prison has been recorded.

8.1.2 Surveys

With the Community Level and Household Surveys, the primary data collection has been obtained to focus on the community level assessment in terms of describing environmental and social aspects of the Project.

The social field team undertook a combination of household surveys, key informant interviews and secondary data collection which covered four villages within the AoI. The community level questionnaires were conducted with Mukhtars⁶ and Sheikhs⁷ of the affected villages between July 28-30, 2017. Household surveys and key informant interviews were conducted between 12 and 15 September, 2017.

It is important to note that, there are Mukhtars in every village within the Region, who are mainly responsible for official purposes. However, affected communities are often represented by Sheikhs with respect to informal purposes, such as providing information on socio-economic characteristic of local communities.

Interviews with the local community members were conducted in Arabic, the official language of Iraq in order to avoid any regional sensitivity that might arise from conducting interviews in one regional dialect or another.

The main tool for household surveys was a multi-subject questionnaire in Arabic which inquired about household demography, socio economy, land assets, local problems, control over resources and health. The household survey also included questions regarding community perception of impacts, such as impacts on local economy, local employment, environment (water, land, air), community's security, community's health, village's social structure and sense of community (e.g. through migrant workers), and local community infrastructure. In line with the sampling methodology, the total of 356 household questionnaires was conducted in affected village. Table 8-1 provides a detailed breakdown of these by village.

Table 8-1 Numbers of Households Surveyed

Villages	Number of Household Surveys
Al-Sayeh	29
Al-Agir	50
Al-Mahmud	136
Aujeah	141
Total	356

⁶ Mukhtar is the head of a village or neighborhood in many Arab countries. Mukhtars are usually selected by some consensual or participatory method, often involving an election.

⁷ Sheikh commonly designates the ruler of a tribe or community who, usually, inherited the title from his father. Sheikhs are also known as religious leader of their community.

As stated above, the baseline studies were conducted with male participants due to nature of the cultural and religious restrictions of the Aol. **Figure 8-1** presents a photo that has been taken during the household questionnaires within the Aol.



Figure 8-1 Photo taken during the Household Questionnaires

The summary of the surveys are provided in the below sections. Details of the social surveys will be presented in the related section of the ESIA report.

8.1.2.1 Results of Surveys

According to information gathered from the Community Level Surveys from the head of villages, the total population of Al- Mahmud village is 3,000; 600 in Al-Sayeh; 4,200 in Aujeah and 1,500 in Al-Agir villages. For Al-Agir and Al-Mahmud villages, population figures observed to be increased due to rise in births.

In terms of economic condition of the villages, according to Mukhtar of the Al-Sayeh village, average income of the village is observed to be increased which is, as stated, related to increase in education level of the village. Majority of the working individuals are salaried employees. According to Sheikh of the Al-Mahmud village, majority of the working locals are employed as construction workers and less than half the total population is stated to be unemployed. In Al-Agir village, the Mukhtar stated that the general income of the locals have been decreasing over the course of five years. The main employment opportunities are stated to be technicians and construction workers, and agriculture. These economic

conditions are similar to Aujeah village as well; according to Mukhtar interview, the general income of the locals has been decreasing over the course of five years. The main income opportunities of the village are stated to be pensions, construction workers and agriculture.

According to Community Level Surveys interview with all the village leaders, the education level for both genders are quite high, almost all children are attending primary and secondary schools. For high school, the locals use city centres, except Al-Mahmud village, the village consists all education levels in one building. There are also considerable amount of individuals who graduated universities in all villages.

In terms of local problems, there are no significant local problems stated during interviews. The common concern of the locals was observed lack of employment opportunities in the area. Furthermore, locals tend to seek village Sheiks in any case of issue.

Detailed social profile information, gathered through household surveys, is available in ESIA Report for each settlement respectively.

8.1.2.2 Project Awareness

Public perception of the CCGT power plant project in all villages of the Aol illuminated through interviews and questionnaires. Also, local people and authorities were target groups. As stated, due to lack of national / local availability of Project related NGOs in the region, the social team could not seek NGO personal's opinion of the Project.

The Governorate of Dhi-Qar and Dhi-Qar City Council are aware of the Project and supporting the Project Subcontractor. The Governorate stated that the region is familiar to foreign investors and willing to adopt a role of a bridge between the locals and the Subcontractor. The Governorate added that, he first heard of the Project approximately 4 years ago and wishes to see operation phase of the Project as soon as possible. Furthermore, the Governorate suggested setting a balance between the local's demands and Project's opportunities. Through setting a balance, appropriate or reasonable requests will be targeted. He continued that, there are a lot of qualified locals that could be employed for the construction phase of the Project. Also, the Governorate suggested to cooperate with the local businesses in order for local community to get benefit as much as possible. [Figure 8-2](#) presents a photo that was taken during the meeting with the Governorate of Dhi-Qar at the MoE office.

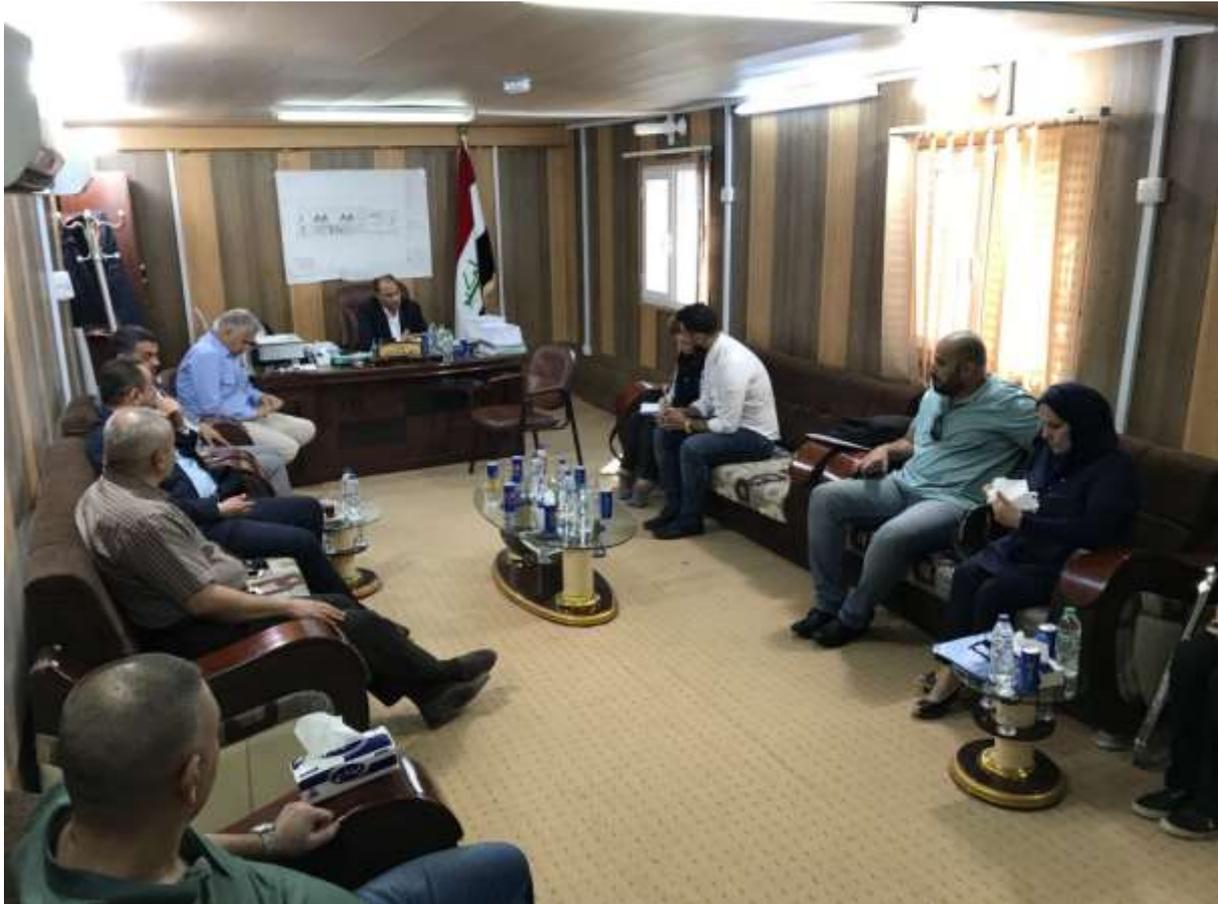


Figure 8-2 Photo taken during the meeting with the Governorate of Dhi-Qar at the MoE office

Majority of the locals from the AoI have heard about the Project through MoE, television and Nasiriyah Thermal Power Plant. Almost all attendees majority of the interviewees and attendees of the PPM were eager to learn further about the Project's employment opportunities. According to interviews conducted in the Aujeah village, a number of villagers are already employed by the Project for excavation works. The locals stated their interest to provide goods and services during both of the PPMs, especially in terms of security services, construction vehicles and machinery. It has been observed that, there is a lack of capacity of goods and services within the borders of the AoI, therefore, the locals are willing to deal these services from the city centers and profit from the commissions

Persons interviewed in Al-Sayeh village indicated that they had prior experienced as construction workers on the Nasiriyah Thermal Power Plant and expressed their interest in having similar roles in connection with the Project.

8.2 First Public Participation Meeting

The initial scoping has been accompanied with stakeholder consultation about the Project's benefits and impact. The "Scoping Phase Meeting" was conducted on 11/09/2017. There were two PPMs for Dhi-Qar Project; one in Aujeah village, the other one in Al – Sayeh village. This was requested by the regional Sheiks of the region. An announcement for the PPM was through local television on September 9, 2017 to inform the public about the date, time, place, and subject of the meeting. As mentioned previously, due to cultural / religious codes of the region, no female participants attended in both meetings. Also, the head of villages did not allow 2U1K to conduct separate 'female-only' participation meeting.

There were total of 50 attendees in the PPM; 10 in Aujeah village and 40 in Al-Sayeh village. 2U1K team, with a help of local translators, made a presentation to inform people about the investment and its key environmental and social impacts identified through scoping. Comments and recommendations of the attendees about the project were taken. For detailed list of the attendees see Annex 2 of this Report. Figure 8-3 presents the photos that have been taken during both PPMs, respectively.



Figure 8-3 Photos taken during the PPMs

The main concerns about the Project, which were raised from the attendees during both of the PPMs are listed below, respectively;

Aujeah village:

- The locals are satisfied in terms of reaching to MoE for Project matters. However, the locals are requesting to establish direct communication with ENKA as well.
- As of now there are 5 locals whom stated to work for the Project. The villagers are expecting higher local worker figures for the Project.
- The locals are willing to work as a security or construction personnel. Also, they are willing to do business for raw materials.

Al-Sayeh village:

- The village currently suffers from high unemployment rates of the young generation. Therefore, the majority of the attendees were young male whom are eager to learn further about the job opportunities.
- The locals requested ENKA to provide skill development trainings to the affected villages, especially for young generation to learn more regarding the construction works, in return, they will be able to find further jobs after the end of construction phases of the Project.
- The locals raised their claims on how they used the Project Site for agricultural purposes⁸.

Each questions, concerns and suggestion raised from the locals have been addressed either by the Project employees or 2U1K experts, respectively.

⁸ Ecological site surveys have been conducted in order to determine the baseline conditions of the Project area and its vicinity in the scope of ESIA studies. Seasonal Ecological Site Surveys were carried out between 22-28 May 2017, 27 July-1 August 2017 and 13-16 September 2017 at the proposed Project Site. Also secondary information from published scientific publications, flora-fauna field guides was collated for the biodiversity assessment. Currently, there is no evidence of agricultural activity in the Project area, because of the high concentration of salt found in the nearby marshes, which eventually contributed to low crop yields.

9 FUTURE STAKEHOLDER ENGAGEMENT

This section describes the stakeholder engagement planned for the Project during Impact Assessment (IA) disclosure, and then during construction and operation.

9.1 Phase 3: ESIA Disclosure

Disclosure of the Draft ESIA Report will provide detailed information about the Project activities, assessment of the impacts and the planned mitigation measures as well as monitoring activities. After submitting the Draft ESIA Report to the lenders, it will be advertised and made available for public review.

Display venues would be expected to include:

- Dhi-Qar Governorship;
- MoE;
- Aujeah, Al-Agir, Al-Mahmud and Al- Sayeh villages; and,
- The Project office.

A community meeting should be held to disclose the ESIA. Electronic copies of the Draft ESIA Report will be made available on CDs/memory sticks and the Draft ESIA Report with its appendices will be distributed to select stakeholders registered on the database. Copies of the Draft ESIA Report will also be made available for download from the Project website.

The Public Relations officer of the Project will be responsible for receiving and collecting all comments. All received comments will be fed into the ESIA finalization process and the Final Report will be posted on the Project website.

9.2 Project Implementation

Stakeholder engagement will continue throughout design finalization, construction and operation. Key stakeholders will be kept informed about the progress of the Project, have the opportunity to provide feedback on the effectiveness of mitigation and enhancement measures and to raise any concerns or grievances. During this process key stakeholders will receive meaningful and accessible information about the mitigation/enhancement and management measures contained in the Environmental and Social Management and Monitoring Plan (ESMMP). Information to be shared before construction commences will include (but is not limited to) the following:

- the impacts that have been identified as a result of the Project;
- the impacts and mitigation or enhancement measures that are being implemented;
- the implementation schedule;
- roles and responsibilities;

- monitoring and management measures; and
- information on the grievance mechanism for the Project.

Implementation phase engagement will focus on new stakeholders, including children and potential and existing employees, as well as those engaged at earlier phases; it will focus on developing relationships through on-going stakeholder engagement and will be designed to build on positive stakeholder relationships established during the ESIA process, carrying these forward through Project construction and operation.

To ensure effective stakeholder engagement, the SEP will be reviewed annually by the PRO, assigned by the Project Employer, throughout construction and operation of the Project, with it being adapted as appropriate.

Project's PRO will be responsible for engagement with stakeholders as an on-going process throughout the life of the Project. This department will be dedicated to conveying information about the Project, finalizing, and implementing the ESIA mitigation measures.

A robust grievance mechanism for workers in both construction stages will be developed by the Project Subcontractor before commencement of either activity. Project Employer will be responsible for the operation phase of the Project. Further, once finalized, this process will be managed separately from the public grievance mechanism, but employees will retain their right to access the public grievance mechanism for non-employment-related issues.

Stakeholder groups, engagement activities and specific discussion areas for the Project implementation phase engagements have been detailed in [Table 9-1](#), below.

Table 9-1 Stakeholder Engagement Activities

Engagement Activities Undertaken			
Stakeholder	Engagement Methods	Main Objectives	Specific Discussion Areas
Mukhtar / Sheikh	In-Depth Interviews	<ul style="list-style-type: none"> ➤ Identify Stakeholders ➤ Identify directly and indirectly affected people 	<ul style="list-style-type: none"> ➤ The aim of the Project ➤ The scope of the Project
Local residents Mukhtar / Sheikhs	<ul style="list-style-type: none"> ➤ Community Level Survey ➤ Focus Group Discussions ➤ Scoping Phase Meeting ➤ Public Participation Meeting 	<ul style="list-style-type: none"> ➤ Identifying the negative impacts ➤ Identifying the positive impacts ➤ Identifying the impact indicators ➤ Providing recommendations on mitigation and enhancement measures to strengthen the positive effects and minimize the negative effects of the Project. 	Impacts of the construction and operation phases.
Future Engagement: Impact Assessment Disclosure			
Stakeholder	Engagement Methods	Main Objectives	Specific Discussion Areas
Local residents Mukhtar Sheikh Businesses Impacted Government Departments	<ul style="list-style-type: none"> ➤ Newspaper ➤ Community Meetings ➤ Website ➤ Television Advertisements ➤ Provision of Draft ESIA document 	<ul style="list-style-type: none"> ➤ To make the final ESIA available to all interested and affected stakeholders. ➤ Inform Project design and management plans 	<ul style="list-style-type: none"> ➤ Content of ESIA ➤ Key positive and negative impacts ➤ Residual impacts and manners in which they can be mitigated
Future Engagement: Implementation			
Stakeholder	Engagement Methods	Main Objectives	Specific Discussion Areas
Local Residents, Mukhtar / Sheiks/ Government Departments	<ul style="list-style-type: none"> ➤ Media notifications of project progress ➤ Community consultation events ➤ Updating SEP and Sustainability reporting ➤ On-going Community liaison and grievance logging, resolution and reporting ➤ Phone line and postal and email address 	<ul style="list-style-type: none"> ➤ Identifying the negative impacts ➤ Identifying and advertising the positive impacts ➤ Identifying the impact indicators ➤ Providing recommendations on mitigation and enhancement measures to strengthen the positive effects and minimize the negative effects of the Project. 	<ul style="list-style-type: none"> ➤ Impacts of the construction phase –focusing on those raised at the ESIA stage, such as road safety, and any unforeseen impacts ➤ Impacts of the operation phase.

10 GRIEVANCE MECHANISM

10.1 Overview

Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities and other stakeholders.

A grievance management process will be established for the Project. This will provide a formal and on-going avenue for stakeholders to engage with the Project. This grievance mechanism will be accessible to all sections of the affected community, at no cost and will not impede access to other judicial or administrative remedies. Affected communities will be repeatedly informed about the grievance process over the course of community engagement activities.

Stakeholders will be able to share their opinions and grievances via a range of options such as web sites, letters and face to face meetings during all future phases of the Project. Feedback will also be provided to demonstrate how their comments and suggestions have been incorporated into the Project decision-making process in the second public participation meeting and this process will be continue in all phases of the Project. A separate grievance mechanism will be established for Project workers.

Grievance procedures will be coordinated through the nominated Grievance Officer who will feed the grievances through to the Project Subcontractor's PRO, who is the primary interface between the community and the Project Subcontractor. Confidentiality procedures will be put in place to protect the complainant, as appropriate.

In general, the grievance mechanism will be advertised and announced to affected stakeholders so that they are aware of the process, know they have the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with one of the Subcontractor's PROs.

As stated in Section 8.1.1.1 (Limitation) of this Report, the engagement with the women in the AoI has not been permitted by the official and religious heads of villages and locals themselves. In order to implement grievance mechanism equally and fulfill the need for engagement with local stakeholders in a culturally appropriate way throughout the Project phases, it is advised that a local female PRO should also be hired in order to ensure the design of the mechanism is responsive to everybody resided in the AoI.

The methods used to publicize the availability of the grievance mechanism should be culturally appropriate and in accordance with how stakeholders usually acquire information.

Women and men may access information differently and it needs to be ensured that both have equal access to information.

To promote 'female only' Grievance mechanism, it is advised that banners can be posted in public facilities as well as outside of the Project area. It is advisable to make female staff available to assist via in person, private phone line, letter and e-mail. From the observations made during the baselines studies, in person access may not be expected to be the first option to state grievances, however, approximately 70% of the locals resided in the Aol have cellular phone, therefore, 'female only' phone line can be established. Also, the local health facilities and local schools should be informed and banners should be placed regarding the gender specific mechanism to increase efficiency.

10.2 The Grievance Mechanism

Complaints should be reviewed as soon as possible in order to prioritized for resolution. Regardless of general response and resolution timeframes, some complaints may require immediate attention, for example, an urgent safety issue or where it concerns the livelihood of locals or workers.

There are 10 steps that complete the grievance mechanism. This process has been summarized in Figure 9-1, and has been detailed in the text below.

Step 1: Identification of grievance through personal communication with appropriately trained and advertised Project Subcontractor workers (PROs). This could be in person, by phone, letter, or email using the contact details below:

- **Name:** Mr. Muwafaq Yousif Azeez
- **Tel:** +964 782 786 5242
- **Mail:** nassiriyah1@yahoo.com / nasiriah@gppproject.moelc.gov.iq

Step 2: Grievance is recorded in the 'Grievance Log' (paper and electronic) within one day of identification. The grievance log will be held at the Project Subcontractor's offices and managed by the PRO. The significance of the grievance will then be assessed within five to seven days using the criteria outlined in [Box 10-1 Significance Criteria](#).

Box 10-1 Significance Criteria

Level 1 Complaint: A complaint that is isolated or 'one-off' (within a given reporting period - one year) and essentially local in nature.

Note: Some one-off complaints may be significant enough to be assessed as a Level 3 complaint e.g., when a national or international law is broken (see Level 3).

Level 2 Complaint: A complaint that is widespread and repeated (e.g., dust from construction vehicles).

Level 3 Complaint: A one-off complaint, or one which is widespread and/or repeated that, in addition, has resulted in a serious breach of the Project Subcontractor's policies or National law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g., inadequate waste management).

Step 3: Grievance is acknowledged through a personal meeting, phone call, or letter as appropriate, within a target of 10-14 working days after submission (expect the complaints that require immediate attention). If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

Step 4: The Grievance Officer is notified of Level 1, 2 or 3 grievances and the Project Manager/Director is notified of all Level 3 grievances. The senior management will, as appropriate, support the Grievance Officer in deciding who should deal with the grievance, and determine whether additional support for the response is necessary.

Step 5: The GO delegates the grievance within five to seven days via e-mail to relevant department(s)/personnel to ensure an effective response is developed (e.g., human resource, relevant administrative departments, contractors etc.)

Step 6: A response is developed by the delegated team and Grievance Officer within 14 days, with input from senior management and others, as necessary.

Step 7: The response is signed-off by the senior manager for level 3 grievances and the Grievance Officer for Level 2 and Level 1 grievances within 14 days. The sign-off may be a signature on the grievance log or an e-mail which indicates agreement, which should be filed by the Grievance Officer and referred to in the grievance log.

Step 8: Communication of the response should be carefully coordinated. The Grievance Officer ensures that an approach to communicating the response is agreed and implemented.

Step 9: Record the response of the complainant to help assess whether the grievance is closed or whether further action is needed. The Grievance Officer should use appropriate communication channels, most likely telephone or a face to face meetings, to confirm whether the complainant has understood and is satisfied with the response. The complainant's response should be recorded in the grievance log.

Step 10: Close the grievance with a sign-off from the Grievance Officer. The Grievance Officer assesses whether a grievance can be closed or whether further attention is required. If further attention is required the Grievance Officer should return to Step 2 to re-assess the grievance. Once the Grievance Officer has assessed whether the grievance can be closed, he/she will sign off or seek agreement from the Project Manager for level 3 grievances, to approve closure of the grievance. The agreement may be a signature on the grievance log or an equivalent e-mail, which will be filed by the Grievance Officer and referred to in the grievance log. In addition, a "Grievance Closeout Form" will be used. (See: Annex 2). This process is outlined in Figure 10-1.

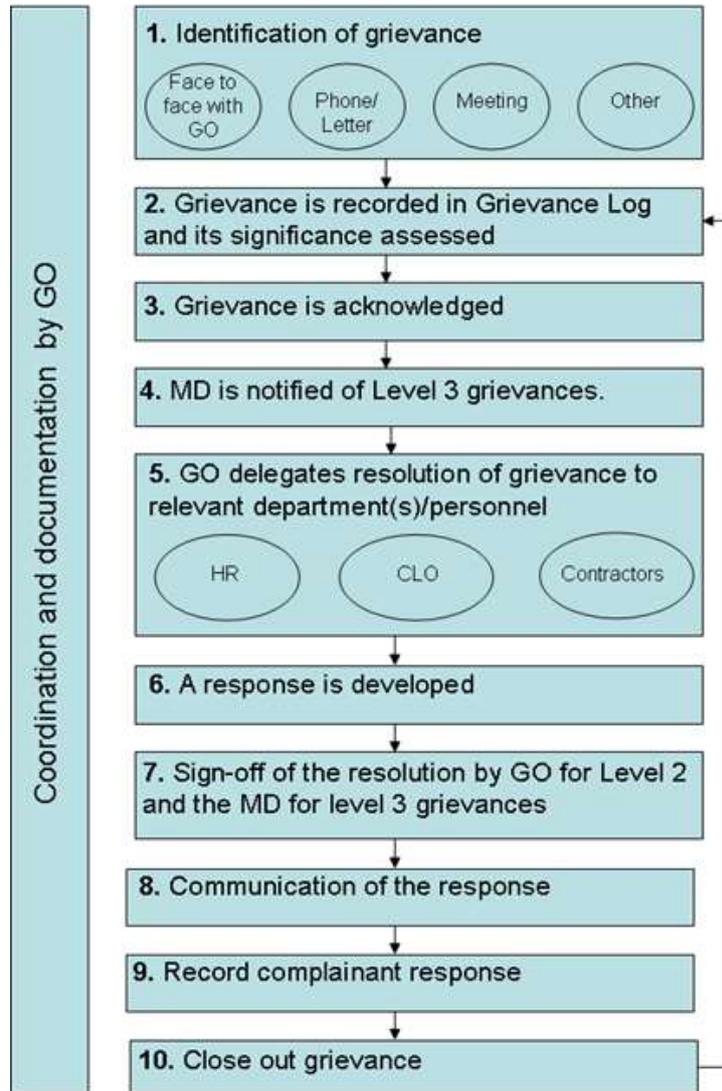


Figure 10-1 Flowchart for Processing Grievances

10.3 Grievance Procedure Channels of Communication

Numerous channels will be used for stakeholders to submit any complaints and requests:

- Telephone – All incoming calls will be registered and information summarized daily and sent to the relevant department for processing and action in accordance with the grievance procedure outlined above.
- Electronic channels – Stakeholders have the opportunity to send comments, remarks, requests and complaints via the official website of the Project Subcontractor.
- Post – Mail can be used by stakeholders for submission of their queries/requests/complaints/comments for consideration by the PRO. All incoming letters will be documented and stored as well as the responses sent to the originating party in accordance with the grievance procedure outlined above.
 - Name: Mr. Muwafaq Yousif Azeez
 - Tel: +964 782 786 5242
 - Mail: nassiriyah1@yahoo.com / nasiriah@gppproject.moelc.gov.iq
- Any queries/requests/complaints/comments can be brought to the attention of the Project Subcontractor verbally or written (e-mail) or by filling in a Grievance Form which will be available in the project site office (See Annex 3).

ANNEX-2 Sample of Grievance Closeout Form

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent

Grievance closeout number:	
Define immediate action required:	
Define long term action required (if necessary):	
Compensation Required?	<input type="checkbox"/> YES <input type="checkbox"/> NO
CONTROL OF THE REMEDIATE ACTION AND THE DECISION	
Stages of the Remediate Action	Deadline and Responsible Institutions
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	

COMPENSATION AND FINAL STAGES

This part will be filled and signed by the complainant after s/he receives the compensation fees and his/her complaint has been remediated.

Notes:

Name-Surname and Signature:

Date.../.../....

Representative of the Responsible Institution/Company

Title-Name-Surname and Signature

ANNEX-3 Sample of Grievance Form

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent.

Reference No	
Full Name	
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address <input type="checkbox"/> By telephone:..... <input type="checkbox"/> By e-mail:.....
Province/Town/Settlement	
Date	
Category of the Grievance	
1. On assets/properties impacted by the project	
2. On infrastructure	
3. On decrease or complete loss of sources of income	
4. On environmental issues (like pollution)	
5. On employment	
6. On traffic, transportation and other risks	
7. On land acquisition	
8. Other (Please specify):	
Description of the Grievance What did happen? When did it happen? Where did it happen? What is the result of the problem?	
What would you like to see happen to resolve the problem?	

Signature:

Date:

ANNEX-4 Project Brochure – English & Arabic



PROJECT PARTIES

The Project Owner will be the Ministry of Electricity (MoE) of Iraq, which will own and operate the Project.

GE (the EPC Contractor) will provide the Power Island Equipment and will also be responsible for the plant performance tests.

The scope of work of ENKA UK (the Main Sub-contractor) covers engineering, procurement of balance of plant, construction, erection, commissioning and start-up of the power plant.

Combined Cycle Gas Turbine

The Project is designed as a Combined Cycle Gas Turbine (CCGT) Power Plant, which is a form of highly efficient energy generation technology that combines four gas turbines with a steam turbine. This "combined cycle" will improve the power plants' efficiency by harvesting waste heat from the gas turbines and using it to boil water to generate steam for the steam turbines. Consequently, the power output of the system is significantly increased without any additional fuel usage. Besides being more efficient than a simple cycle power plant, this configuration also emits less carbon dioxide into the atmosphere per megawatt-hour produced.

Contact Information

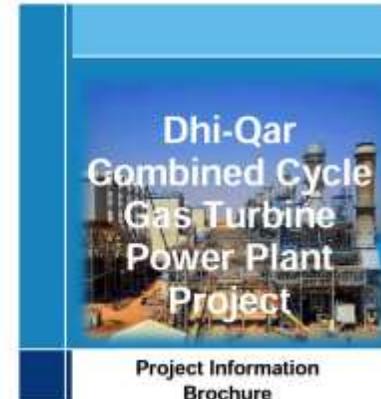
2U1K International Limited

Address : PS 6 - 3rd Floor, The Meydan Office Tower, The Meydan Road, P.O. Box 450676 Dubai - UAE
Tel : +90 533 283 6569
E-mail : gunalozenirler@2u1k-int.com

Ministry of Electricity of Iraq, General Directorate for Gas Power Plants Projects

(Contact Person: Mr. Muwafaq Yousif Azeez)

Address : Nile Quarter Borsaeed St. P.O. Box 3099 Baghdad – IRAQ
Tel : +964 782 786 5242
E-mail : nassiryah1@yahoo.com / nasiniah@gppproject.moelc.gov.iq



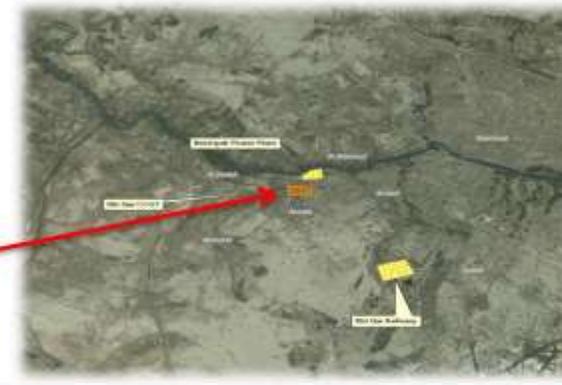
September 2017



PROJECT LOCATION

The Project will be located near Nasiriyah City in Dhi-Qar Governorate, 230 km northwest of Basra, in southern Iraq.

The Project site is located in a rural area with Nasiriyah Thermal Power Plant at less than 1 km distance and Dhi-Qar Refinery at approximately 4.7 km distance.



Project Description

- GE (the EPC Contractor), with its Main Subcontractor, ENKA UK will design and build the Dhi-Qar Combined Cycle Power Plant, which will add 750 MW to the Iraqi Grid.
- The Gas Turbines were purchased by the Ministry of Electricity of Iraq as part of the Mega-Deal between the Government of Iraq and GE and will be handed over to GE-ENKA UK for installation and commissioning.
- The Plant will be the first combined cycle project of that will be owned and operated by the Ministry of Electricity of Iraq, also known as the Project Owner.
- The Project site is state-owned lands.
- An area of approximately 50 ha has been allocated for the Project by the MoE.
- About 1100 construction workers will be employed during this phase. They will accommodate in the camp area within the Project site.
- The site mobilization was started in August 2017.
- The construction period for two phases will be 34 months.
- Local employment opportunities will be promoted for the construction activities through cooperation with the Social Recruitment Committee which is a part of the Governorate.
- Health, safety and environmental measures will be implemented throughout the construction phase.
- The MoE will be responsible for the security around the Project site.



موقع المشروع

سوف يقع المشروع بالقرب من مدينة الناصرية بمحافظة ذي قار على بعد 230 كم شمال غرب الناصرية جنوب العراق.

يقع موقع المشروع في منطقة ريفية قرب محطة كهرباء الناصرية الحرة على مسافة 4.7 كم من كيلومتر واحد ومصفاة ذي قار على مسافة 4.7 كم تقريباً.

وصف المشروع

- موقع المشروع هو أراضي مملوكة للدولة.
- خصصت وزارة الكهرباء حوالي 50 هكتاراً للمشروع.
- سيتم توظيف حوالي 1100 عامل بناء خلال هذه المرحلة وسوف يقيمون في منطقة المخيم داخل موقع المشروع.
- بدأت مرحلة تعبئة الموقع في آب / أغسطس 2017.
- فترة البناء على مرحلتين ستكون 34 شهراً.
- سيتم تعزيز فرص العمل المحلية في أنشطة البناء من خلال التعاون مع لجنة التوظيف الجماعي التي هي جزء من المحافظة.
- سيتم تنفيذ تدابير الصحة والسلامة والبيئة خلال مرحلة البناء.
- ستكون وزارة الكهرباء مسؤولة عن الأمن حول موقع المشروع.

• ستقوم شركة جنرال إلكتريك (GE) المقاول المسؤول عن الهندسة والشراء والبناء (مع مقاولها الرئيسي من الباطن شركة ENKA بتصميم وبناء محطة السمامة المركبة لتوليد الطاقة الكهربائية والتي ستضيف 750 ميكاواط إلى الشبكة العراقية.

• تم شراء توربينات الغاز من قبل وزارة الكهرباء العراقية كجزء من الصفقة الضخمة بين حكومة العراق وشركة جنرال إلكتريك وسيتم تسليمها إلى شركة جنرال إلكتريك - ENKA UK للتثبيت والتشغيل.

• ستكون المحطة أول مشروع دورة مركبة مجتمعة والتي سوف تكون مملوكة وتشغل من قبل وزارة الكهرباء في العراق، والمعروفة أيضاً باسم مالك المشروع