

18 Stakeholder Engagement Plan

TotalEnergies is planning to construct a Solar PV Project that is located 10 km northeast of Wadi Ad Dawasir in the region of Riyadh in the Kingdom of Saudi Arabia. Clean Environmental Technologies (CET) has been commissioned to conduct a formal Social Impact Assessment (SIA) for the proposed project.

The Project capacity will be 119 MWp and is expected to produce 300 GWh per year. The site has been selected because it is well suited for the solar panels since it is near an electricity distribution station. The land is generally flat sand with some areas being undulated sand, hence, devoid of any significant vegetation, and there are no archaeological or cultural heritage sites of interest in the project area.

This SIA has defined an area of influence (AOI) within 50 Km of the site. Within this AOI, the project may cause a positive or a negative impact on the environment and local communities. The focus of the study has been to assess impacts that are both beneficial and detrimental in proximity of the project.

Feedback from the consultations indicate that there is generally a positive opinion of the proposed Wadi Ad Dawasir solar panel Project, all the interviewees view that the project will bring employment opportunities and improve the local economy. While none of the interviewees have expressed any negative views that would stop or delay the project, there were some concerns expressed on possible environmental impacts such as dust, noise, the impact on the near afforestation and whether if the radiations will harm the Livestock.

Potential impacts to community and regionally have been evaluated in this study. As in any project, social impacts are largely associated with land acquisition, risks to vulnerable communities, impact on community lifestyle, infrastructure, income, and security, health and safety.

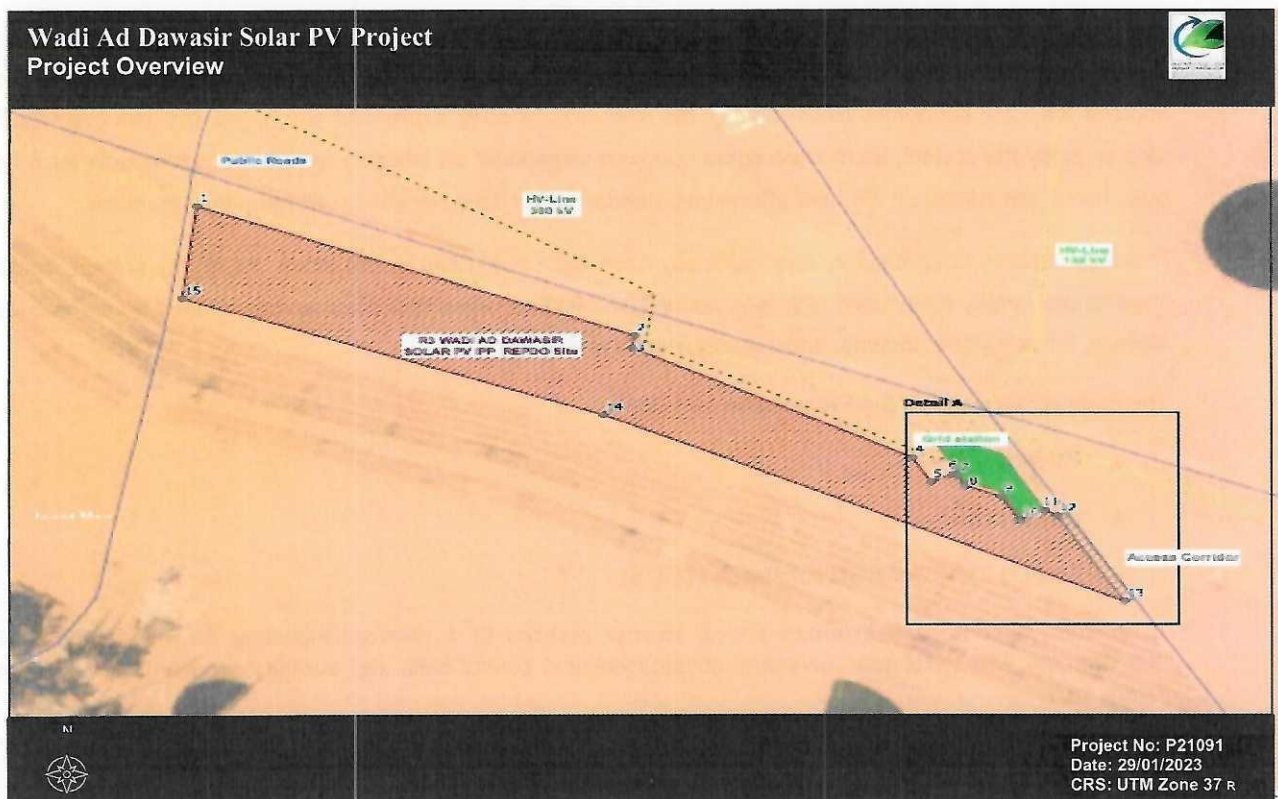
The main components of the Project area as follows:

- PV modules
- One (1) SGU
- One (1) 33/132kV SGU substation (SGUS)

16 inverter stations of 2 inverters and 2 inverter stations of 1 inverter, including all MV components (transformers, MV switchgear, inverters, communications, control units and auxiliary services), as shown in Figure 18-1.

- Interconnection with the Saudi Arabian Transmission System: 132 kV transmission high voltage underground evacuation lines from the SGU to the SEC switchyard.
- Cabling (DC, AC, LV and MV) necessary for collecting and transporting energy will be selected and sized to withstand local conditions (e.g., temperature and radiation) and to minimize energy losses
- Earthing system
- Single Axis Tracking mounting system
- A Fence will be installed around the site and will comply with Saudi Arabian Standards
- Roads
- Security system and intruder detection system
- Instrumentation and control system, SCADA
- Buildings: interconnection cabin, Administration and Control building and associated facilities, storage and maintenance, and control access
- Infrastructure including: Roads and access, Buildings, Water supply, Stormwater management.

Figure 18-1 Project Overview



18.1 Applicable Legislation and Standards

18.1.1 Preamble

Within the KSA, the MEWA is the highest authority controlling environmental issues, implementing policies and legislation to achieve sustainability of the environment and natural resources. The national entity responsible for establishing legislation and standards is the National Centre for Environmental Compliance (NCEC), formerly the GAMEP whose roles and responsibilities have been transferred to five units for environmental sector development including:

- The NCEC;
- The National Centre for Meteorology;
- The National Centre for Vegetation Cover;
- The National Centre for Waste Management; and,
- The National Centre for Wildlife.

18.1.2 Institutional Framework

The Saudi Arabian national environmental legislation was enacted on 24th September 2001 in the form of the General Environmental Regulation (GER), Council of Ministers Resolution No 193 [3]. It entered into force in October 2002, and its Implementing Rules were published in 2003. Under the GER, the Presidency of Meteorology and Environment (PME), was charged with the general supervision of environmental affairs in Saudi Arabia and had the responsibility of granting environmental permits.

In 2016, a Royal Decree was issued and the name of the PME was changed to the General Authority of Meteorology and Environmental Protection (GAMEP). GAMEP was the governing authority for the management of environmental affairs within the KSA (outside the industrial cities of Jubail, Yanbu, Jazan and Ras Al Khair, where responsibility is delegated to the Royal Commission (RC)). In the same year (2016) the Ministry of Agriculture was renamed to the Ministry of Environment, Water and Agriculture (MEWA). Within the KSA, the MEWA is the highest authority controlling environmental issues, implementing policies and legislation to achieve sustainability of the environment and natural resources.

In 2019, GAMEP's functions and responsibilities were transferred to the five national centres of excellence detailed in the Section **Error! Reference source not found..**

The previously mentioned GER (which granted the former PME authority to regulate environmental affairs) has been superseded by Royal Decree No M/165, July 2020, which came into force on 13th January 2021.

18.1.3 Relevant Government Bodies and Organisation within KSA

A high-level overview of the governmental bodies and organisations responsible for the development and enforcement of environmental legislation in the KSA is provided in Table 18-1. This table also includes government entities that may be consulted with regards to a Project development (usually outside of the EIA process).

Table 18.1 Relevant Government Bodies and Organisations within KSA Concerned with Environmental Matters

Organization	Description
Ministry of Environment, Water and Agriculture (MEWA)	The ministry consists of eight agencies, namely the environment, water affairs, agriculture, land and surveys, animal resources; and planning, shared services and Economic Affairs and Investment.



Organization	Description
NCEC	The national entity working with all parties to improve the environmental commitment through pollution monitoring, environmental assessment, and strengthening environmental control and guidance in the region as well as being committed to enhancing the sustainability of the environment.
Ministry of Energy	One of the governmental bodies of Saudi Arabia and part of the cabinet. The ministry has the function of developing and implementing policies concerning petroleum and related products.
Ministry of Human Resources and Social Development	The Ministry of Human Resources and Social Development was established in 2019 after merging Ministry of Labour and Social Development with Ministry of Civil Service. It is responsible for providing the community with development, support, and protection. The Ministry is also in charge of labour affairs and its related issues and policies.
Ministry of Municipal and Rural Affairs and Housing (MoMRAH)	Established in 1975 and is responsible for the supervision and regulation of municipalities in the Kingdom. The Ministry is the central governmental organization entrusted with the oversight and regulation of municipalities across the country's cities, towns, and villages.
Ministry of Commerce and Investment	Responsible for managing the commerce and investment sectors. The Ministry is required to develop and implement effective and efficient policies and mechanisms, which will contribute to achieving sustainable economic development. This will enhance growth while protecting the interests of beneficiaries.
Ministry of Transport	Provides an integrated transport sector aimed at providing safety, effectiveness and efficiency, and technical and economic development within the transport sector.
Saudi Geological Survey	Provides advisory services to the government of the KSA on geological matters. It has been authorised to study geological aspects of environmental issues and to determine ways to protect and mitigate the harmful effects of mining activities.
Saudi Commission for Tourism and National Heritage	Responsible for tourism, archaeological and heritage sectors in the KSA. Their aim is to strengthen the tourism sector and promote sustainability, environmental protection and conservation of Saudi national heritage and culture.
Saudi Investment Recycling Company (SIRC)	The SIRC is a wholly owned subsidiary of the Public Investment Fund (PIF) of KSA. The company was founded to develop, own, operate, and finance various activities across all waste types to establish recycling capacities in the Kingdom and build a circular economy for a sustainable future.
National Centre for Waste Management (NCWM)	Aims to regulate and supervise waste management activities, stimulate investment in the Centre, and improve its quality based on the principle of circular economy in waste management to achieve sustainable development goals.
Royal Commission for Riyadh City Waste Management Strategy	The strategy assured the start of implementing integrated waste management system and recycling operations and monitoring the waste transportation to destination. It also included the companies and agencies that deal with recycling and sorting of waste by authorizing and accrediting the equipment to be used and using colour code for trucks and trailers.

Organization	Description
National Centre for Wildlife	Responsible for sustaining terrestrial and marine wildlife, maintaining protected areas and for rehabilitating rare and threatened species and their habitats.
Ministry of Interior	The responsible authority for national security, naturalization, immigration and customs in KSA.
Ministry of Health	The ministry responsible for the health of the citizens of KSA. Recently, the Ministry has played an influential role in advising the Saudi government on social matters that could assist with the health of the Saudi people.

Within the KSA, the MEWA is the highest authority controlling environmental issues, implementing policies and legislation to achieve sustainability of the environment and natural resources.

18.1.4 International standards

The IFC Performance Standards notes that stakeholder engagement provides the basis for building strong, constructive and responsive relationship that is essential for managing a project's environmental and social impacts. This is achieved through stakeholder consultations which should be an organized approach to identify and incorporate the needs of those who may have direct or indirect stake in the project. By identifying and analyzing stakeholder interests early, the project would include a social management plan, minimizing risk while promoting an improved project and public interaction. A 'Stakeholder' therefore is an individual, community or entity with interest in the project. The level of interest or influence are based on the attributes of opinion/position, power, level of actual interest in the project, and their strength as a group/coalition.

Typically, stakeholder analysis would involve identifying and classifying stakeholders according to their degree of influence and importance Figure 18-2. A preliminary stakeholder analysis is provided in Table 18-2, some of the stakeholders listed in the table were not visited due to their unavailability.

- Undertake an initial reconnaissance survey of the townships, villages and settlements within the area of influence.
- Approach local directorates/offices of government agencies and request meeting with the key decision maker, i.e. Office Director or Manager
- Present a summary of the project.
- Collect baseline information as available.
- Record opinion, positive feedback, concerns and recommendations.
- Complete the online record of the meeting.

Consultations with tribal representatives were carried out within and respecting traditional religious values. Consultations were held only with male representatives and any direct contact with female members was avoided.

Consultations were recorded and archived using predesigned template in google forms, see the link below. The form was filled at the end of each consultation session capturing relevant information including documentation and photos.

<https://docs.google.com/forms/d/1iOfNcpD8-z1A6AlZIkEpVgxCsd5c-7krYSpe4m0pqfU/edit?ts=6395c6d2>

Figure 18-3 Site Boundaries & 50 km Radius





18.2.1 Tool and schedule

It is proposed to conduct consultations within 50Km of the project site Figure 18-3. It has been observed that typically in interior locations of the Kingdom, government representatives are open to meeting and discussions. As such typically the consultations involved the following:

- Undertake an initial reconnaissance survey of the townships, villages and settlements within the area of influence.
- Approach local directorates/offices of government agencies and request meeting with the key decision maker, i.e., Office Director or Manager
- Present a summary of the project.
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18.3 Stakeholder identification

Table 18.2 Preliminary Stakeholder Analysis

Government Agency	Scope of Authority	High Influence / High Interest	High Influence / Low Interest	Low Influence / High Interest	Low Influence / Low Interest
		Potential to Stop Project	Potential Cause to Project Delays	Potential to Indirectly Influence Project	No Perceived Influence on Project
Ministry of Water, Agriculture and Environment	Environmental Approval & Water and Wastewater Authority	✓			
Ministry of Energy	Saudi Electricity Company	✓			
Ministry of Interior/National Guard	Security		✓		
Ministry of Municipal and Rural Affairs	Land Use, Local Municipal Services	✓			
Ministry of Health	Local Health Authority			✓	

Government Agency	Scope of Authority	High Influence / High Interest	High Influence / Low Interest	Low Influence / High Interest	Low Influence / Low Interest
		Potential to Stop Project	Potential Cause to Project Delays	Potential to Indirectly Influence Project	No Perceived Influence on Project
Ministry of Transportation	Road Infrastructure			✓	
Ministry of Human Resources and Social Development	Labour, Saudization	✓			
Saudi Wildlife Authority	Conservation Areas	✓			
Local Families in Wadi Ad Dawasir	Local tribal affiliations who have used the land for generations			✓	

Table 18.3 Stakeholders Details

Date	Government Agency or Tribal Representative	Provide details of local directorate/authority of the agency. If meeting with family/tribal representative provide name of the tribe/family	Designation	Local Directorate/Agency/Family/ Tribe Representative Full Name
2/6/2023	Ministry of Municipal and Rural Affairs	Municipal of Wadi Ad Dawasir	Mayor's Advisor	Mani' Al-Yami
2/7/2023	Ministry of Water, Agriculture and Environment	N/A	Deputy General Manager	Saeed Abdullah Alla'aban
2/7/2023	Ministry of Health	Wadi Ad Dawasir Hospital	Deputy Director of the Hospital	Mohammed Mubarak Al-Wizrah
2/7/2023	Tribal Representative	Al-Owaimer Center	Tribal Representative	Turki Mohammed Al-Nafees
2/7/2023	Tribal Representative	Al-Khamasen Center	Tribal Representative	Aidh Mubarak Aidh
2/8/2023	Tribal Representative	Athumamia Center	Tribal Representative	Shabab Mohammed Aldawsari
2/8/2023	Civilian	Athumamia Center	Military Affiliate	Saad Mohammad Ad-Dawsari

Date	Government Agency or Tribal Representative	Provide details of local directorate/authority of the agency. If meeting with family/tribal representative provide name of the tribe/family	Designation	Local Directorate/Agency/Family/ Tribe Representative Full Name
2/8/2023	Civilian	Athumamia Center	Resigned Physics Teacher	Fawaz Misfer Ad-Dawsari
2/8/2023	Civilian	Athumamia Center	University Student	Abdullah Saad Ad-Dawsari

18.4 SEP Implementation

The aim of the grievance response mechanism is to provide communities including vulnerable groups with confidence that their grievances and concerns will be recorded and addressed. Every grievance/complaint received must be recorded however the extent to which they are addressed will be evaluated on a case-to-case basis. Good practice in grievance mechanisms will involve the steps outlined in Figure 18-4.

Figure 18-4 Good Practices in Grievance Mechanisms (Adapted from IUCN's ESMS Grievance Mechanism Guidance Note)

Accessible	• Mechanism is fully accessible to all parties that might be affected by the project
Practical	• Mechanism is cost-effective and practical in its implementation and doesn't create a burden for project implementation
Effective and timely response	• The provisions and steps for responding to complaints and seeking solution are effective and timely
Transparent	• Decisions are taken in a transparent way, and complainants are kept abreast of progress with cases brought forward
Independent	• Oversight body and designated investigator is independent from project management
Protection from retaliation	• Procedures are in place to protect the complainant and minimize the risk of retaliation
Maintenance of records	• Diligent documentation of negotiations and agreements and good maintenance of records on all cases and issues brought forward for review

It is important that every recorded/reported grievance or complaint is assessed to be credible. Some of the key considerations in credibility evaluation include:

- If the complaints relate to regulations, standards and or company policies.
- If the complaints have been repeatedly reported by more than one entity.
- If the complaints relate to a deviation from the SAP in (SIA)

While it is expected that a site-specific procedure shall be developed to receive, review and respond to grievances, at a minimum the response mechanism shall comprise the elements described in Figure 18-5:

Receive

- Ensure that there are multiple options available for vulnerable groups to communicate their grievances.
- Ensure barriers to communicating grievances are minimized. Such barriers could include language and lack of a specific contact person/focal point.
- Focal points/contact person should be trained to receive grievances without intimidating vulnerable groups/complainant.
- Provision should be available to lodge a grievance anonymously.
- On Site workers shall be informed that their grievances can be reported in person or anonymously.
- Contact details of the site manager shall be posted at the entrance to the site and on the company website for off-site communities, regulators and vulnerable groups to contact when required.

Acknowledge

- A complaints/grievance register shall be maintained at the site which shall be accessible to vulnerable groups and local communities identified in this document.
- All grievances and complaints irrespective of whether they are relevant or not, shall be formally acknowledged.

Review and Delegate

- All grievances and complaints shall be subject to a review by an internal management team who will decide and justify if the specific concern is within the scope of the project.
- The review shall classify grievances/complaints into the categories in Table 18-4.

Table 18.4 Classification of Grievances and Suggested Response

Classification	Type	Recommended Response
1	Not Related to the Project	Refer to local authorities OR inform complainant
2	Irrelevant complaints	Close the complaint and inform the complainant
3	Contractual	Refer to procurement/supply chain management
4	Criminal	Refer to law enforcement
5	On Site Workers	Refer to HR, Site Health and Safety
6	Off Site Communities	Refer to Corporate
7	Contracted Workers	Refer to procurement/supply chain management

Respond

- Establish a mechanism for documented response.
- Project shall decide in coordination with TotalEnergies, if a prior resolution is required with the complainant before initiating the response.
- Ensure confidentiality of response.
- Ensure response is easily understandable by the complainant.

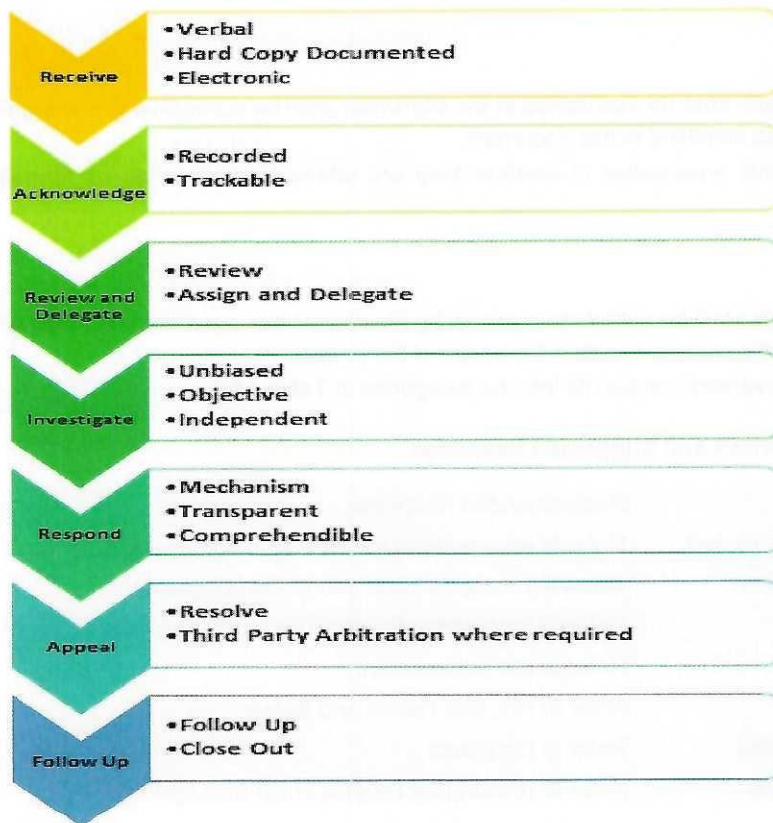
Appeal

- Provide an opportunity to appeal.
- Where an appeal is made, the complaint shall be reviewed once again and in coordination with TotalEnergies a decision shall be taken on the actions to be taken.

Follow Up and Close Out

- If the response includes specific actions to be taken by TotalEnergies, the status of implementation shall be monitored and reported to the Corporate
- Once all actions are completed/resolved, the complaint shall be closed formally.

Figure 18-5 a minimum the response mechanism



Noor AlWadi Renewable Energy Company

Appendix 3: Grievance Reporting Form

Grievance Report Form صندوق التظلم - الشكاوي					
Date : التاريخ		Location: الموقع			
Name: (Don't write if need to be stay an anonymous) الاسم: (إذا كنت لا تريد الإفصاح عنه يمكنك وضعه كمجهول)					
Type of Grievance: Pls Tick نوع التظلم					
Land / Property الأرض		Job الوظيفة		Environment البيئة	
Logistics Transport	/	Employee Behavior		Commercial related	
Description of the Grievance and expected corrective action: اشرح نوع التظلم - الشكوى , وما هو الإجراء التصحيحي المقترح :					
Mention contact number if required the feedback (Optional) : اكتب الرقم الخاص بك (اختياري)					
Rectification Actions					
Sl.No	Actions	Responsible Dept.	Target Date	Completion Status	
Grievance requirements are complied and closed. -					
Ensured by :					

