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# BAZYAN POWER PLANT PROJECT

## STAKEHOLDER ENGAGEMENT PLAN



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MAY, 2015  
ANKARA



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## STAKEHOLDER ENGAGEMENT PLAN

Version	Revision	Date	Prepared by	Checked by	Approved by
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## ABBREVIATION LIST

<b>EIA</b>	Environmental Impact Assessment
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMMP</b>	Environmental and Social Management and Monitoring Plan
<b>FGDs</b>	Focus Group Discussions
<b>GO</b>	Grievance Officer
<b>HR</b>	Human Resource
<b>IA</b>	Impact Assessment
<b>ICP</b>	Informed Consultation and Participation
<b>IFC</b>	International Finance Cooperation
<b>KRG</b>	Kurdistan Regional Government
<b>kV</b>	Kilowatt
<b>MWe</b>	Megawatt
<b>NGOs</b>	Non-Governmental Organizations
<b>PPM</b>	Public Participation Meeting
<b>PRO</b>	Public Relations Officer
<b>PS</b>	Performance Standards
<b>SEP</b>	Stakeholder Engagement Plan
<b>SIA</b>	Social Impact Assessment
<b>SPV</b>	Special Purpose Vehicle

## 1. INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the ‘Bazyan Power Plant Project (Bazyan PPP) (hereinafter ‘the Project’). It has been prepared by 2U1K on behalf of Qaiwan Group (the Project Company).

Bazyan Power Plant Project (the Project) is being developed by the Project Company under the regulations of the Power Administration of Kurdistan Regional Government (KRG). The Project Company has established a Special Purpose Vehicle (SPV) for the execution of the overall Project. The SPV has approached to International Finance Cooperation (IFC) to get finance for the Project. An Environmental and Social Impact Assessment (ESIA) Report will be prepared for the Project in line with international practice. This SEP has been prepared in conjunction with the overall ESIA process for the Project and it has been prepared in line with the IFC standards. And it needs to be revised throughout the Project implementation phases.

In accordance with IFC standards, the purpose of the SEP is to:

- consult and participate with directly and indirectly affected people,
- inform indigenous and vulnerable people,
- 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 the project decision-making processes during all stages of the project lifecycle.

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

This SEP is owned by the Project Company which is committed to, and accountable for, its implementation.

### 1.1. PROJECT OVERVIEW

#### 1.1.1. Bazyan Power Plant Project

The Project will be realized in two phases. The Plant output is expected to be 750 MW, including a Steam Turbine with a capacity of 250 MW and four Gas Turbines with a total capacity of 500 MW.

Each of the Gas Turbines will have an installed capacity of 125 MWe resulting in a total installed capacity of 500 MWe. In the second phase, a 250 MWe Steam Turbine is planned to be added. There will be no Overhead Transmission Line (OTL) included within the Project. There will be no Traditional Boilers and the Project will have Heat Recovery Steam Generators (HRSG) to extract energy from the Gas Turbine exhaust and convert it to steam for use in the Steam Turbine. The more information regarding of energy usage of the project will be provided in the ESIA report.

The Power Plant will utilize natural gas as the primary fuel while it is also planned to use light fuel oil (i.e. a type of diesel) as the back – up fuel in cases when natural gas is unavailable. The Power Plant will have 15 days (47,000 m<sup>3</sup>) supply of fuel oil on site.

The financing of the Project will be sourced from the Coface, thus, the Project is subject to compliance with the International Finance Cooperation's (IFC) performance standards.

While the Project is required to be subjected to an official EIA Process under the legislation of the Republic of Iraq and the KRG, an Environmental and Social Impact Assessment (ESIA) study is also required by the IFC. In this respect, the Project Company assigned 2U1K Engineering and Consultancy Inc. (2U1K) to conduct the ESIA study for the proposed Project. ESIA studies will be based on the latest design data in accordance with the pertinent international regulations and guidelines. The ESIA report will include a comprehensive assessment of environmental and social issues determined during the scoping process.

An EIA process according to local legislation will be implemented with a team of local experts. Also, 2U1K conducted public participation meetings on February 28 with the Village of Serchaway and on March 1 with the Village of Kani Shaitan, and second public participation meeting was held in 11 September with the villagers of Kani Shaitan in 2014 in Bazyan Public Library. The meeting was announced on the local newspaper, Hawlati.

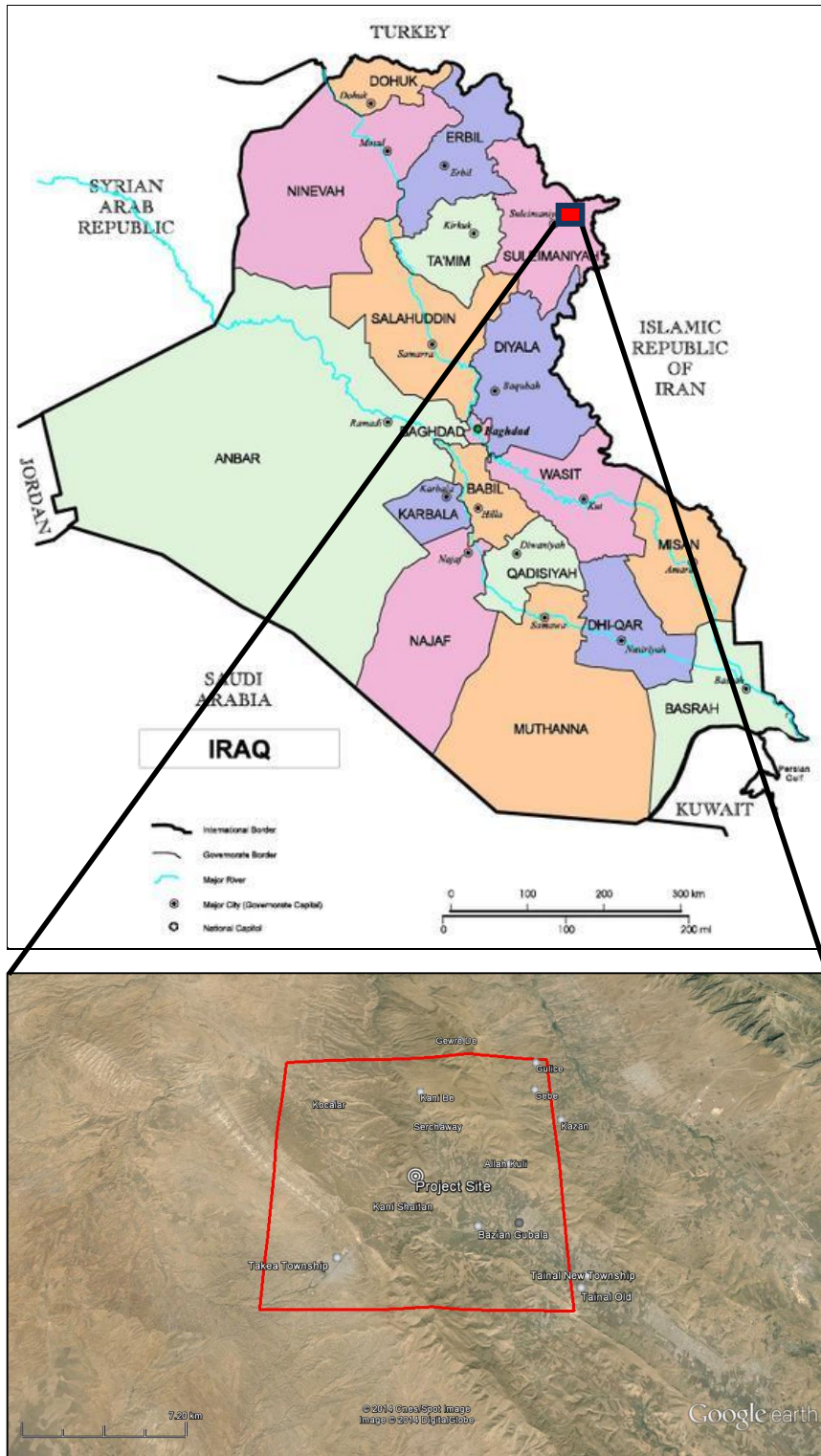
## 1.2. PROJECT AREA

The Project Site is located in the Bazyan sub-district of Sulaymaniyah Province. The sub-district is further sub-divided into “townships” and “villages”. Townships are headed by Mayors and villagers are headed by Mukhtars. The area which falls within a 7.5 km radius extending out from the Project Site has been deemed as the Project's local impact area and includes ten villages and four townships.

The settlement areas in the Project impact areas are given below;

- Villages are; Kani Be, Kocalar, Serchaway, Kazan, Gebe, Gulice, Gewre De, Allah Kuli, Tainal Old and Kani Sheitan.
- Townships are; Berde Karaman, Bazyan Gubala and Tainal New and Takea.

The Project site is located in the Village of Kani Shaitan of Bazyan District. The site location is in the rural part of the District Centre and nearly 40 kilometres from the District Centre.



**Figure 1-1** Project Location

Source: Iraq Map has been accessed on <http://iraqpictures.org/map-of-iraq/>.  
Satellite image has been obtained using Google Earth.



## 2. REGULATORY REQUIREMENTS

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

- the legislative requirements of KRG,
- the IFC standards and
- the gaps between KRG legislation and international standards.

### 2.1. KRG Legislation

Regarding the national legislation, there are currently two valid Laws, which comprises Stakeholder Engagement in KRG. Related national laws about the stakeholder engagement process are given in Table 2-1 below.

**Box 2-1** Related Laws about the Stakeholder Engagement of KRG

Related Laws about the Stakeholder Engagement
<p><b>A- Oil And Gas Law Of The Kurdistan Region – Iraq / Law No. (22) – 2007-Chapter Eight Authorisations / (Invitations And Awards) / Article 26:</b> Clause 3.</p> <ul style="list-style-type: none"> <li>➤ An application for an Authorisation shall include conditions for;               <ul style="list-style-type: none"> <li>· <i>“Securing the health, safety and welfare of persons involved in or affected by the Petroleum Operations;</i></li> <li>· <i>protecting the environment, preventing, minimising and remedying pollution, and other environmental harm from the Petroleum Operations;</i></li> <li>· <i>training of, and giving preference in employment in the Petroleum Operations to, citizens of the Region and other citizens of Iraq; and</i></li> <li>· <i>the acquisition of goods and services from Persons based in the Region and other parts of Iraq.”</i></li> </ul> </li> </ul> <p><b>B- Investment Law Kurdistan Region – Iraq / Law No. (4)-2006-Chapter Four / (Investor's Obligations) / Article 8:</b> Clause 5.</p> <ul style="list-style-type: none"> <li>➤ An Investor shall comply with the following;               <ul style="list-style-type: none"> <li>· <i>“To safeguard the environment, maintain public health and safety, and comply with standardization and quality control systems, in accordance with international standards.”</i></li> </ul> </li> </ul>

### 2.2. IFC Performance Standards

Since Coface of France is a potential lender for the Project and Coface states in “Our Environmental and Social Commitment” document in their official web site that “Coface carries out a systematic environmental assessment of all major credit-insurance projects managed on behalf of French state when the French share is above 10 millions € or when located in or near a sensitive area. These projects must comply with the local environmental laws, and the relevant international standards such as the World Bank Group ones.”, the Project must align with good international practice, including the IFC Performance Standards (PS) and Guidance Notes of 2013. IFC 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-2-2. 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 2-2 Specific Objectives of the IFC Standards Regarding Stakeholder Engagement

##### IFC PS:1 Stakeholder Engagement

**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.

**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.

**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.

**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.

**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.

**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.

### **2.3. Gaps between KRG Legislation and International Guidelines**

The most prominent topic, which requires further elaboration in KRG Environmental 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, Kurdish Environmental Legislation does not stipulate implementation of detailed socio-economic surveys at the Project Site or the establishment of a Grievance Mechanism. However, these are required by international standards. Such differences are taken into consideration in respective sections in the ESIA Report.

### 3. PROJECT STAKEHOLDERS

#### 3.1. Introduction

For the purposes of this SEP, a stakeholder is defined as any individual, organization, or group which are 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.

#### 3.2. Stakeholder Identification and Analysis

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 connections to the Project. Having an understanding of the connections of a stakeholder group to the Project helps identify the key objectives of any engagement.

A list of the organizations and individuals identified to date has been presented in Appendix-1. This list will be kept up to date if new stakeholders are identified during the course of the Project. Table 3-1 illustrates how each stakeholder is connected to the Project.

**Table 3-1** Connection of Stakeholders to the Project

Stakeholder Groups	Stakeholder Type		Connections to the Project
	Affected Party	Other Interested Party	
<b>Local Communities</b>			
<ul style="list-style-type: none"> <li>• Mukhtars and Mayors of 14 affected settlements.</li> <li>• Residents of 14 affected settlement areas</li> <li>• Users of local public amenities</li> <li>• Employees of surrounding government institutions and public amenities</li> <li>• Principal communities to be served by the Project</li> </ul>	√		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.
<b>Government</b>			
<ul style="list-style-type: none"> <li>• Power Administration</li> </ul>	√		The Project will strengthen short -term Strategy of the KRG such as:

Stakeholder Groups	Stakeholder Type		Connections to the Project
			<ul style="list-style-type: none"> <li>Electricity Production will be sourced from gas and oil residues.</li> <li>Transmission lines will be installed.</li> <li>The electricity grid infrastructure will be updated and improved.</li> <li>More electricity will be provided to citizens.</li> </ul>
<b>Local Administrations</b>			
<ul style="list-style-type: none"> <li>Tainal</li> <li>Berde Karaman</li> <li>Gubala</li> <li>Takea</li> <li>Bazyan</li> </ul>		√	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 Company will have to work in cooperation with the municipalities.
<b>Employees</b>			
<ul style="list-style-type: none"> <li>Construction Staff</li> <li>Employees of Power Administration</li> </ul>	√	√	The construction and operation of the Project will require substantial labor effort and employment.
<b>Academics</b>			
<ul style="list-style-type: none"> <li>Suleymaniyah University</li> </ul>	√	√	Local Academicians of the University are also welcomed to participate public meetings for the scientific views.

## 4. STAKEHOLDER ENGAGEMENT APPROACH

### 4.1. Overall Approach

The Project will maintain on-going engagement with KRG authorities (Power Administration, Municipalities and Mukhtars), 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, 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 them, are detailed in Table 4-1.

**Table 4-1** Stakeholder Engagement Approach

Phase	Objectives	Key Activities
Phase 1: Initial Engagement	<ul style="list-style-type: none"> <li>To introduce the Project to the affected and interested stakeholders.</li> <li>To identify key stakeholders to be consulted.</li> <li>To generate feedback on the scope, approach and key issues for the ESIA.</li> <li>To generate feedback on the Scoping Report.</li> </ul>	<ul style="list-style-type: none"> <li>Secondary data analysis to identify key stakeholders.</li> <li>Meetings are held with relevant government stakeholders.</li> <li>Meetings are held with community leaders (Mukhtars).</li> <li>First public participation meeting was organized.</li> <li>Project Description leaflets was distributed.</li> </ul>

Phase 2: Impact Assessment	<ul style="list-style-type: none"> <li>To introduce the Project where necessary.</li> <li>To inform and validate the baseline data through semi-structured interviews and questionnaires.</li> <li>To generate feedback on Project activities and have specific discussions regarding potential impacts and proposed mitigation/enhancement and monitoring measures.</li> <li>To manage local expectations, concerns and any misconceptions.</li> <li>To enable stakeholders to input into the Project design and management plans.</li> </ul>	<ul style="list-style-type: none"> <li>Semi-structured interviews with key informants.</li> <li>In-depth interviews with selected stakeholders.</li> <li>Formal questionnaires issued to businesses.</li> <li>Focus Group Discussions (FGDs) with selected stakeholders.</li> </ul>
Phase 3: IA Disclosure	<ul style="list-style-type: none"> <li>To make the final ESIA available to all interested and affected stakeholders.</li> <li>Project design and management plans.</li> </ul>	<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><b>Address:</b>        4<sup>th</sup> Floor Sulaymaniyah Mall, Iraq        ☎: +964 53 319 0248</p>
Phase 4: Project Implementation	<ul style="list-style-type: none"> <li>To ensure all affected and interested stakeholders are informed about project progress and have the opportunity to raise any concerns or grievances.</li> <li>To receive feedback on the effectiveness of mitigation and management measures.</li> <li>To manage grievances.</li> </ul>	<ul style="list-style-type: none"> <li>Project updates and progress information are made available to all affected and interested stakeholders via Mukhtars' offices and other public places.</li> <li>On-going maintenance and availability of the Grievance Procedure are carried out.</li> </ul>

#### 4.2. Stakeholder Engagement Tools

A range of tools is being used for the stakeholder engagement as part of this Project. These include public participation meetings, focus group discussions, community level questionnaires, leaflets, posters 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. Vulnerable groups in the context of this project include: people who live with the assistance of

others, elderly people, female-headed households, the physically disabled and the mentally disabled.

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.

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

#### 4.2.1. Project Brochures

A brochure for the Project was developed in February, 2014. It includes information of explanation of natural gas fired power plant project, site maps, project overview and stages of the power plant. It also outlines the environmental and social impact assessment process and provides contact information (email, phone, postal address) of the Public Relations Department of the Project Company for any grievances (for details see Appendix-2).

#### 4.2.2. Grievance Mechanism

A grievance mechanism which will allow stakeholders to raise concerns or complaints personally and via post or electronic mail (contact details in *Section 4.2.4*) was developed. 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.

#### 4.2.3. Public Relations Officer (PRO)

In order to maintain regular communication with affected communities a Public Relations Officer (PRO) is hired. The PROs 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 Section-7).

Contact details for this office are:

- Name: Saiwan Selih
- Tel: +964 771 884 9884
- Email: eng\_saiwan@yahoo.com

#### 4.2.4. Newspapers

National newspapers were used to invite stakeholders to public meetings. They will continue to be used to publically reach wide audiences, as appropriate. The national (Hawlati) newspaper was used for the announcement which advertised the date of meeting, time, place, and subject of the meeting. The details of the announcement can be seen in Appendix-3.



#### 4.2.5. Public Participation Meetings

Open and targeted meetings were conducted to be held to engage with stakeholders, as appropriate.

##### 4.2.6.1 First Public Participation Meeting (PPM)

The scoping phase PPMs were conducted on 28<sup>th</sup> of February and 1<sup>st</sup> of March, 2014 at 10:00 pm at Bazyan Public Library. Two PPMs were conducted to share information regarding the investment, to the villagers of Kani Shaitan and Sercahaway. The national (Hawlati) newspaper was used for the announcement which advertised the date of meeting, time, place, and subject of the meeting. Ten villages and four townships which are located within the area of influence were invited to the meeting by phone calls. The ESIA team made presentations, ideas and suggestions of the villagers about the Project was listened to and noted.

The main concerns about the Project raised from the attendees are listed below;

- The villagers were expecting to be hired by the Project and wished that a representative from Qaiwan group was in the PPM to hear the comments and concerns,
- It was questioned that; if there is a possibility of land purchasing from Kani Shaitan,
- The villagers were wondering if they would receive electricity from the station in the future.
- The villagers have experiences of these types of meetings, therefore, they stated that if Qaiwan brings problem like other Projects they will be against the Project.
- The villagers demand authorities who will assist their comments and concerns.
- Although there are no engineers or people with higher degrees in the village, they are expecting to be hired by the Project because they believe that they should be the one to do the labor work not an outsider.
- The villagers are willing to use their tractors for the Project, if they get hired.
- In the past the villager practiced Apiculture but due to the factories around the villages beehives were ruined.
- The villagers are willing to deal with Qaiwan Group, however, they are worried about the health risks due to the pollution.
- The villagers mentioned about how they have been promised for asphalt, electricity and water. However, none of the promises have been met by the Refinery .

- The villagers want to see how they can get benefit from the Project. They believe that, this type of project cannot be implemented in Baghdad or Kerkuk, due to safety risks. Therefore, since this area has a low risk profile, the Project authorities should be beneficial to the villagers.

For the detailed list of the participant of the first PPM see Appendix-4.

#### 4.2.6.2 Second Participation Meeting

The “Public Participation in Environmental and Social Impact Assessment Meeting” was conducted on September 11, 2014 at 14:00 pm in the Bazyan Library. The attendees were informed by phone. Totally twenty-five people attended to the meeting including, mukhtar and residents of Kani-Shaitan Village. Information has given about the investment, and the company officials and the ESIA team made presentations. Ideas and suggestions were taken about the project. The main concerns about the Project, which were raised from the attendees, are listed below;

- The Project Company should provide good relationship between the villagers and subcontractors of the construction phase to maximize local workers.
- One of the most common expectations of the villagers was to rent their cars and machines.
- The villagers wanted a contract to guarantee their job expectations.

For the detailed list of the participant of the second PPM see Appendix-5.

#### 4.2.6. Public Notices

Public display materials will continue to be used as a tool to communicate with large audiences, particularly in busy pedestrian areas. To inform the public about the plant leaflets were also distributed to public.

#### 4.2.7. Phone Calls

The phone number for the will be widely distributed with future Project information. The PRO will engage directly with stakeholders through phone calls, when necessary.

## 5. PREVIOUS STAKEHOLDER ENGAGEMENT

### 5.1. Phase 1: Initial Engagement

Initial stakeholder engagement activities were conducted between January, 2014 and March, 2014 in order to:

- identify all key stakeholders,
- provide an overview of the proposed development to key local community members,
- inform stakeholders of the ESIA process, and to
- discuss key impacts associated with the Project.

The ESIA team of 2U1K visited the Project area in the fourth week of January, 2014 and held interviews with the Mukhtars.

### 5.2. Phase 2: Impact Assessment

During the main impact assessment stage, baseline data was collected. Both existing secondary data and primary data collection were undertaken through field surveys. Stakeholder engagement is a critical part of this work and the ESIA team was conduct meetings with the stakeholders listed below:

- Residents of the villages,
- Muhktars,
- Governmental institutions,
- Municipalities,

### Key Issues

The following issues will be discussed with stakeholders during engagement activities undertaken to date. Detailed records of the consultations, which are comprised of general concerns, and the expectations of the project is listed below. For the details See Appendix-6.

### Population

- There seems to be an expectation of population increase within the region due to job creation.

### Social Services & Infrastructure

- Villagers have environmental concerns. However these concerns are not directly related with the Project. Other factories around the village are creating environmental pollutions. The villagers have concerns related with the emissions.
- There is an expectation of traffic increase due to the fact that children who attend to high school go to Bazyan.
- It was mentioned that, the housing prices will increase.
- The villagers mentioned how they are in need for electricity since even their house water work with electricity.
- They state that, since there will be negative consequences with this project, such as air and water quality; they at least want some benefits that will help their life.

### **Economy, Employment & Livelihoods**

- It was stated that, “Since the employment opportunities are quite low in the region, hiring people from our community will help our income”.
- Men usually work as labourer at the Suleymaniyah. There is no high education levelled individuals within the region.
- They believe that, the housing prices will increase and there will be an employment opportunities.

### **Quality of life**

- It was stated that, the villagers are concerned about the noise, dust and traffic.

### **Other Comments**

- It was suggested that, there should an official that communities throughout the project phases and informs the locals about the updates.
- It was suggested that, there should be a representative selected from the women population of the village to inform the rest of the women of the communities.
- It was suggested that, face-to-face informal communication is going to be the best approach.
- The villagers believe that mukhtar should be the bridge between the villages and the Project Company.

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

### **5.3. Phase 3: IA Disclosure**

The aim of the disclosure of the Draft ESIA Report is to provide detailed information about the proposed Project activities, the assessment of the impacts and the planned mitigation and monitoring measures. The ESIA report and its appendices were published on 13 January 2015 on the lenders website. The report can be reached from <http://video.coface.com/fr/environnement/ESIA%20Power%20Plant.pdf>. The report is currently available for public review.

Second public participation meeting was also held disclose the ESIA. Electronic copies of the Draft ESIA Report will be made available on CDs/memory sticks and a Non-Technical Summary of the Draft ESIA Report with its appendices will be distributed to select stakeholders registered on the database.

The stakeholders, which are directly affected by the Project, are planning to be informed about the disclosure process, by phone. The Public Relations officer of the Project is responsible for receiving and collecting all comments. All received comments is being recorded to fed into the ESIA finalization process.

## 1. FUTURE STAKEHOLDER ENGAGEMENT

### 1.1. 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.

Information from the ESMMP will be presented through a number of briefing sessions and community meetings.

Implementation phase engagement will focus on new stakeholders, including project workers of operation phase, 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 throughout construction and operation of the Project, with it being adapted as appropriate.

Bazyan Power Plant Project's public relations team 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. The Public Relations department will also manage the grievance mechanism, including the establishment and management of the grievance database and coordination with the Bazyan PPP senior management to respond to community grievances/concerns. The department will also ensure that the grievance mechanism is functioning effectively within agreed resolution timeframes and that there is a mechanism for applying lessons learned.

A robust grievance mechanism for workers in both construction and operation stages will be developed by the Project Company before commencement of either activity. 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 6-1, below.

**Table 1-1** Implementation Phase Engagement

Stakeholder	Engagement Methods	Main Objectives	Specific Discussion Areas	Dates	Responsible Body
<b>Local residents</b>	Media notifications of project progress, grievance logging, resolution and reporting	To ensure all affected and interested stakeholders are informed about project progress and have the opportunity to raise any concerns or grievances.	Key impacts of the construction and operational phases	From 2 months before the construction to the end of the construction period.	Public Relations Officer.
<b>Users of local amenities and facilities</b>	Community consultation events. On-going Public Relations (communication with locals to inform about design progress regarding possible overlapping of project site boundaries with nearby businesses) and grievance logging	To receive feedback on the effectiveness of mitigation and management measures.	Community and worker health and safety.	From the end of construction and throughout operation	Human Resource Depart.

Stakeholder	Engagement Methods	Main Objectives	Specific Discussion Areas	Dates	Responsible Body
Construction workers	Construction Management Plan and Workers' Grievance Mechanism	To manage grievances.			The Public Relations Depart.

## 2. GRIEVANCE MECHANISM

### 2.1. 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 Bazyan PPP. 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. The ESIA for the project will be released into the public domain for review and comment. Hard copies of the ESIA (in Kurdish and English) will be made available at the Project Office and at the office of the related Villages and Townships in (Kani Be, Kocalar, Serchaway, Kazan, Gebe, Gulice, Gewre De, Allah Kuli, Tainal Old, Kani Shaintan, Berde Karaman, Bazyan Gubala, Sheetan, Tainal New, Takea).

The Project will report regularly to the public on its implementation whilst protecting the privacy of individuals.

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 continued in all phases of the Project. A separate grievance mechanism will be established for construction workers.

Bazyan PPP's grievance mechanism has been designed to ensure that all received grievances are acknowledged, logged and that the complainant knows what to expect in terms of response capacity and timeframe. Grievance procedures will be coordinated through the nominated Grievance Officer who will feed the grievances through to the Project Company's PRO, who is the primary interface between the community and the Project Company. Confidentiality procedures will be put in place to protect the complainant, as appropriate.

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 company's PROs.

### 2.2. The Grievance Mechanism

There are 10 steps that complete the grievance mechanism. This process has been summarized in Figure 7.1, and has been detailed in the text below.



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

- Name: Saiwan Selih
- Tel: +964 771 884 9884
- Email: eng\_saiwan@yahoo.com

**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 Company’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 below:

- **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 which 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 Company’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. 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).

**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 GO 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 GO and referred to in the grievance log.

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

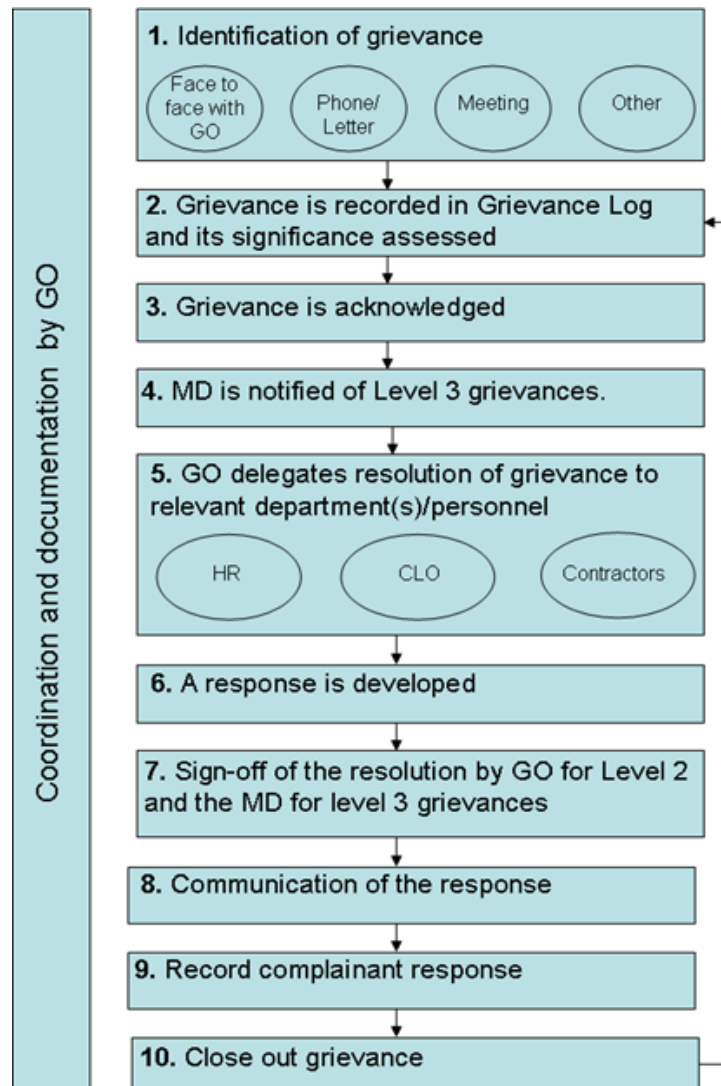
**Step 9: Record the response of the complainant** to help assess whether the grievance is closed or whether further action is needed. The GO should use appropriate communication channels, most likely telephone or a face to face meetings, to confirm whether the complainant has understood and is satisfied 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 GO. The GO assesses whether a grievance can be closed or whether further attention is required. If further attention is required the GO should return to Step 2 to re-assess the grievance. Once the GO 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 GO and referred to in the grievance log. In additional, a "Grievance Closeout Form" will be used. (see Appendix: 6 This process is outlined in Figure 7.1.

### 2.3. 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.
- 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. The postal address of the PRO's Office is: 4th Floor Sulaymaniyah Mall, Iraq.
- Any queries/requests/complaints/comments can be brought to the attention of the Project Company verbally or written (e-mail) or by filling in a Grievance Form which will be available in the project site office (See Appendix-7).



**Figure 2-1** Flowchart for Processing Grievances