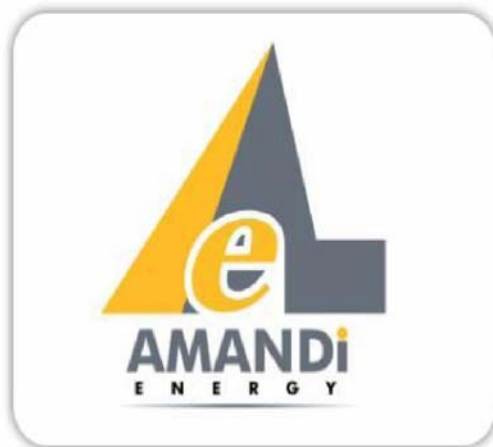




AMANDI ENERGY LIMITED - GHANA

STAKEHOLDER ENGAGEMENT PLAN SUPPORTING THE ENVIRONMENTAL & SOCIAL IMPACT ASSESSMENT



190 MW COMBINED CYCLE POWER PLANT AT ABOADZE, GHANA



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Name of the person and title (responsible for SEP)	Contact Information
Martin Lawer Akondor, Project Development Manager (Environment & Social)	Address: 5 Osu Badu Street P.O. Box KIA -30408, Accra, Ghana Tel: +233 544334141 Mobile: +233 267747744 Email: martinak@amandico.net



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Appendix A – EIA Permitting Process

Appendix B – Listed Stakeholders

Appendix C – Draft Stakeholder Engagement Programme

Appendix D – Public Consultation Register Template



Appendix E – Grievance Mechanism

Appendix F – Public Grievance Form



LIST OF ABBREVIATIONS

AEL	Amandi Energy Limited
AfDB	African Development Bank
BOO	Build Own Operate
DCE	District Chief Executive
ECG	Electricity Company of Ghana
EIB	European Investment Bank
EPA	Environmental Protection Agency
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment (also referred to as EIA)
ESMP	Environmental and Social Management Plan
FPIC	Free, Prior, and Informed Consent
GCSA	Government Consent and Support Agreement
GE	General Electric
GIIP	Good International Industry Practice
GRIDCo	Ghana Grid Company Limited
GSA	Gas Supply Agreement
HRSG	Heat Recovery Steam Generator
ICP	Informed Consultation and Participation
IFC	International Finance Corporation
IPP	Independent Power Producer
JSA	Joint Service Agreement
LTSA	Long Term Service Agreement
LCO	Light Crude Oil
MIGA	Multilateral Investment Guarantee Agency
MW	Megawatts
NGO	Non-Governmental Organisation
OPIC	US Overseas Private Investment Corporation
PPA	Power Purchase Agreement
PURC	Public Utility & Regulatory Commission
SEP	Stakeholder Engagement Plan
SPM	Single Point Mooring
TBC	To Be Completed
VRA	Volta River Authority
WAGP	West Africa Gas Pipeline



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SECTION 1

INTRODUCTION



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1 INTRODUCTION

1.1 Background

1.1.1 This document is the Stakeholder Engagement Plan (SEP) for Amandi Energy Limited (AEL) which describes the public relations and communications activity undertaken to date and planned for the future, regarding their planned development of a combined cycle power plant at the Takoradi Power Enclave. The AEL project will consist of a nominal 190 MW combined cycle gas turbine (CCGT) and ancillary development. The plant will be located on 62.55 acres of land acquired from the Aboadze Royal Family, situated next to the existing Volta River Authority (VRA) Thermal Power Plants and approximately 2 km west of the Aboadze Township, in Ghana, West Africa. The SEP has been developed to support the Environmental and Social Impact Assessment (ESIA) to ensure effective stakeholder engagement and consultation throughout all of the key stages of the Project i.e. design, planning, permitting, construction and commissioning through to the plant operating at full load.

1.1.2 The SEP takes into account Good International Industry Practice (GIIP)¹ in relation to information disclosure. It also outlines the general engagement principles that AEL will adopt and those which will be used for this major investment project.

1.1.3 The SEP will be reviewed and updated on a regular basis. If AEL's activities change significantly or the planned investment changes or new activities relating to stakeholder engagement commence, then these changes also will be reflected in the SEP.

1.1.4 The specific objectives of the SEP are detailed below.

1.2 Objectives of the Plan

1.2.1 The methods, procedures, policies and actions undertaken by AEL to inform stakeholders, in a timely manner, of the potential impacts and the mitigation measures planned for this project are key subjects of this document.

1.2.2 The Project stakeholders have been identified in this document. If any Project impacted groups/individuals have not been identified, they should contact the AEL manager responsible for environmental and social matters (contact details provided on page 3 of this document) and request to be included in future information and communications. Furthermore, this document describes the way in which any concerns or grievances which may arise, will be handled by the Project.

1.2.3 This document provides a proposed schedule for consultations, which may be subject to revisions during project initiation, design and implementation of this plan. The resources available to implement the SEP are also described.

1.2.4 Previous stakeholder engagement activities have been documented in this SEP. As the SEP will be updated on a regular basis, new engagement activities will be documented in this plan. These updates will include information disclosure and records of engagement with stakeholders and the feedback provided.

¹ IFC Performance Standard 3: GIIP is defined as the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise should be that the project employs the most appropriate technologies in the project-specific circumstances.



1.3 Scope of the Plan

1.3.1 This document covers the following:

- Chapter 2 – Project description, location of the site and key environmental and social issues;
- Chapter 3 – Public consultations and information disclosure requirements;
- Chapter 4 – Identification of stakeholders and other affected parties;
- Chapter 5 – Overview of previous stakeholder engagement activities;
- Chapter 6 – Stakeholder engagement programme and methods of engagement;
- Chapter 7 – Monitoring grievance mechanism and resources; and
- Appendices including supplementary information.



SECTION 2

PROJECT DESCRIPTION



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2 PROJECT DESCRIPTION

2.1 Overview of the Project

2.1.1 The Project comprises the development of a CCGT power plant with a generating capacity of approximately 190 MW; it will consist of one gas turbine coupled with a generator, one heat recovery steam generator (HRSG) and one steam turbine.

2.1.2 The Project will operate on light crude oil (LCO) as the primary fuel for the first few years of its operation. It is envisaged that natural gas may then be used from Ghana's oil fields, which are currently under development. However the natural gas option has not been investigated as part of the Environmental and Social Impact Assessment (ESIA).

2.1.3 The site proposed for the Project consists of approximately 62.55 acres of land in an area designated for industrial development. The VRA currently operate the existing thermal Takoradi T1, T2 and T3 Power Plants (VRA Takoradi Power Plants) with a combined generating capacity of approximately 800 MW, to the east of the site. There are currently plans to develop an additional 190 MW (T4) as well as various other Independent Power Producer (IPP) plants in the wider enclave.

2.1.4 The AEL Project will also incorporate four key elements which extend outside of the main site boundary and are considered as ancillary plant but necessary to its successful implementation:

- A 1 km LCO supply pipeline to be routed along the southern border of the existing VRA Takoradi Power Plants site and then to continue alongside the access road to the AEL site.
- All water required for the Project will be obtained from the Atlantic Ocean via a buried / submerged pipeline (of approximately 500 mm diameter) that will extend approximately 1.2 km offshore. A sea water pumphouse on the shore will transfer water from the submerged intake to the site.
- The treated effluent discharge pipework, which will run alongside the intake pipeline, will extend to approximately 600 m offshore buried to a depth of approximately 5 m below the sea bed (at its centre).
- A site access road will run along an existing track (north of the beach) to the south of the site. An access road currently exists from the highway to the VRA Takoradi Power Plants, which will be extended by 1 km to provide access to the south of the Project site.

2.1.5 The LCO pipeline, intake/effluent discharge pipeline and access road will be developed by AEL and are considered part of the Project.

2.1.6 In addition, new high voltage overhead transmission lines will be built by the Ghana Grid Company Limited (GRIDCo), from the plant site to the existing GRIDCo substation. The line will be constructed, owned and operated by GRIDCo and will be subject to a separate ESIA.

2.1.7 The Project site has been selected taking into account factors that include proximity to existing infrastructure, access and logistics for LCO and gas supply, ease of evacuation, distance to water supply, and environmental considerations.



2.1.8 Further details of the site setting and the surrounding areas are provided below.

2.2 Site Setting

The Project Site

2.2.1 The Project will be located in the Shama District of the Western Region of Ghana. The site is located approximately 2 km west of Aboadze Township, 5 km south west of Shama and approximately 12 km from Takoradi, the western regional capital of Ghana. The highest population centre in the vicinity of the power project is Aboadze town, which in 2010 had a population of 9,471². Aboadze, together with the neighbouring town of Abuesi, currently have a combined projected population of 18,996³.

2.2.2 The AEL Project site and the surrounding area currently comprise largely green untouched vegetation with the exception for VRA Takoradi Power Plants which is located approximately 500 metres from the site's eastern boundary. A number of potential receptors have been identified in the surrounding area, including a small village located approximately 910 metres from the northern perimeter within the proposed site of another power project. In addition a cluster of five town houses, a single residence and beach house, and a two bedroom house are currently under construction (330 metres, 500m and 600m respectively away from the western boundary) on the other side of the River Anankwari from the project site.

2.2.3 The Project site is located on the coast and a buffer zone will be observed in accordance with Ghana Maritime Regulations for coastal developments. A similar 20m exclusion zone⁴ is being observed between the River Anankwari and the site. Historically, the beach front stretch has been observed as an unofficial restricted area by the Ghana Navy ostensibly to protect the West Africa Gas Pipeline (WAGP) and the VRA Takoradi Power Plants⁵. Therefore, there is very limited public access, although occasionally some members of the public are spotted on the beach.

2.2.4 The ESIA has concluded that in the immediate vicinity of the site, the local population has full and unobstructed access to land, to the River Anankwari and to the sea (apart from security restrictions on the beach as discussed above). Access to land and the sea from Aboadze town will also not be impacted. The town's fish landing beach is approximately 2km from the Project site.

Nearby Receptors

2.2.5 A summary of the villages, towns, populated clusters and businesses in the vicinity of the Project site are provided in Table 1 below.

Table 1. Surrounding receptors (populated areas, businesses and other developments)

Populated Area / Businesses	Description	Distance and direction from the project site
Landowner's of	There are three parcels of privately owned land to the eastern boundary of the	Approximately 100 metres and 45 metres

² 2010 National Population Census.

³ Projection by the Shama District Assembly.

⁴ Requirement by the Ghana Water Resources Commission.

⁵ Exclusion zone extends 1km on both sides of the gas pipelines offshore. Requirement by the legal act that set up the WAGP.



**SEP supporting ESIA:
Amandi Energy Power Project**

Populated Area / Businesses	Description	Distance and direction from the project site
neighbouring three parcels of land (to the southeast of the AEL site)	<p>Project site. There are two structures on these pieces of land:</p> <ul style="list-style-type: none"> ▪ An uncompleted building (approximately 100 metres from the site's eastern boundary) owned by the respective land owner. To date it has been used as temporary accommodation for contractors in the area (who have been dismantling a wrecked ship offshore). ▪ Four room building near the site's eastern boundary (approximately 45 metres), privately owned by the respective landowner. It is currently used as a site camp by a caretaker for a neighbouring project. <p>AEL understands that both structures may be demolished to pave the way for the JACHFAM Gas Tank Farm to the east of the Project site (see Section 2.2.7).</p>	from eastern boundary of site.
Owner of abandoned buildings on beach to the west of Project site	These disused and unoccupied privately owned structures are outside the Project site perimeter (on the east side of the river). It was originally intended to be a beach resort but the structures regularly flood when the river is unable to flow to the sea due to sandbar blockage.	Approximately 100 metres from the western boundary, to the east of the River Anankwari.
Globeleq IPP	<p>A new power plant with a proposed generating capacity of approximately 400 MW.</p> <p>Project is at the design/ development stage and has yet to be constructed.</p>	To be located approximately 200 m north of the site.
Five town houses, west of site and River Anankwari	New buildings including five town houses. All are presently unoccupied except for the owner's residence. The owner is aware of the AEL Project and has indicated that his properties could be leased for management staff.	Approximately 330 metres from the western boundary and across the River Anankwari.
GE's Ghana 1000 IPP, also referred to as One Energy Project	<p>Site of another new power plant project to be built, comprising of up to 750 MW CCGT. This project is being carried out by the One Energy Limited – a partnership between Endeavour Energy, General Electric (GE), SAGE Petroleum and Eranove.</p> <p>Project is at the design/ development stage and has yet to be constructed. Construction is expected to be phased, starting with just 250 MW.</p>	To be located approximately 450 m north of the site.
New single	Under construction and understood to be	Approximately 500 m



**SEP supporting ESIA:
Amandi Energy Power Project**

Populated Area / Businesses	Description	Distance and direction from the project site
residence and beach house, west of site and River Anankwari	leased out.	west from the site and across the River Anankwari.
VRA Takoradi Plants, to the east of the site	Existing thermal VRA Takoradi Power Plants (T1, T2, T3) with a combined generating capacity of approximately 800 MW, to the east of the site, There are currently plans to develop an additional 190 MW (T4) LCO-fired CCGT power plant, consisting of one gas turbine, HRSG and steam turbine. The target commissioning date for the T4 plant is December 2016.	Approximately 500 m from the eastern fenced boundary.
Two bedroom house, west of site and River Anankwari	Private residence currently being renovated. The caretaker at the site has indicated that they are aware of the Project across the Anankwari River.	Approximately 600 m southwest of the site, across the River Anankwari.
Kwaku Anlo Village	Comprising of four thatched mud houses, with an average of 6 people per household. Residents are mainly subsistence farmers. Currently, this land, which the villagers occupy, has been assigned to the GE's 1000 power plant project by VRA. There is a planned relocation of the village by VRA.	Approximately 910 m north of the site.
Jacobsen IPP Site	Site of another new power plant project to be built comprising 20 dual-fuel reciprocating engines (each with associated heat recovery boilers) and a steam turbine. Project is at the design/ development stage and has yet to be constructed.	To be located approximately 1 km north-northeast of the site.
Jiki Orphanage (also referred to as "Biki")	During initial consultation it was determined that this receptor is being relocated to a larger facility (doubling its capacity to 10 bedrooms), to be built by the developers of the Jacobsen IPP due to its proximity to the site. The orphanage does not fall within the Jacobsen site, but is close to it.	Approximately 1.3 km northeast of the site.
Local Cuisine Catering Services Limited	A cuisine company, with seven employees, off the VRA Plant Inhaban Junction Road consists of a metal container (offices), some construction of sandcrate blocks and a wooden shed. Nobody lives here.	Approximately 1.4 km north northeast of the site.
Malam Village	Located next to the cuisine company premises and near to Nyametease and comprises a lone block building with three bedrooms. A family comprises a security	Approximately 1.4 km north northeast of the site.



Populated Area / Businesses	Description	Distance and direction from the project site
	officer, his wife and three children.	
Water reservoir project	Currently under construction. This reservoir will serve Aboadze.	Approximately 1.4 km northeast of the site.
Nyametease Village	Village consisting of 6 households with a total population of 41. The people of Nyametease village will be relocated by the developers of the Jacobsen IPP.	Approximately 1.5km north–northeast of the site.
VRA Hospital	Hospital serving both VRA and the people of Aboadze and the surrounding communities.	Approximately 1.5 km northeast of the site.
VRA Township including Club House and High School	Developed by VRA to house its staff and their families next to the VRA Takoradi Power Plants and is made up self-contained residential units. The VRA Township has an international school which enrolls children up to the level of a high school. Other amenities within the VRA Township include a club house for recreation. It is understood that the VRA Township has the capacity for 280 people.	Approximately 1.7 km northeast of the site.
Aboadze Township	A rural fishing community.	Approximately 2.2 km east of the site.
Abuesi Town	A subsistent and commercial fishing town that is a twin town with Aboadze, sharing common amenities, with a combined population of 18,996.	Approximately 3.5km east of the site.
Inchaban Town	Inchaban is one of the major towns of the Shama District. It is a buoyant commercial town located on the main Accra – Takoradi Highway. Inchaban serves as a nodal town, linking other towns in the District and the Western Region as a whole. In 2014 the town was reported to have a population of 19,673.	Approximately 2 km northeast of the site

2.2.6 There is another nearby town, Esipon town, which is located 1.8km away from the Project site. The town is largely made up of greenfield and some houses that are being developed. A newly built sports stadium, Esipon Sports Stadium, is located on the Esipon – Sekondi road. This facility was built to host the events of the Africa Cup of Nations football competition (CAN 2008) and is being used for sport events in the region. Note the town and stadium have not been specifically consulted as traffic for the Project does not pass through the town or close to the stadium when travelling to and from Takoradi/ Sekondi (where the imported plant equipment will likely originate). If deemed necessary AEL can consult with the local authorities.

2.2.7 Due to the development of the power enclave in the Project vicinity, it is anticipated that there will be a range of associated development. This includes the proposed site for Abengoa Water to the immediate north of AEL's site. Abengoa Water is running



the feasibility studies for a Build Own Operate (BOO) desalination plant that could provide fresh water to meet the enclave's water needs. All Services Group (ASG) is also proposing a 191 MW CCGT power plant (to be located 1.5 km to the north of the site; however it is in the very early stages of concept/design. There is also a proposal for a gas storage site, JACHFAM, 400m to the northeast of the AEL site; however again it is a very early concept phase and land has not been secured. AEL will continue to monitor these early stage projects.

2.2.8 Figure 1 below provides a map of the site location (in red) and a radius of 1 km (blue line) and 2 km (yellow line) showing the surrounding areas.



Figure 1. Receptors within 1km and 2km from the AEL site centre





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SECTION 3

CONSULTATION AND DISCLOSURE



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3 CONSULTATION AND DISCLOSURE

3.1 Overview

3.1.1 AEL are in the process of engagement with all identified stakeholders including the communities where the Project is located and the relevant authorities to ensure full compliance with regulatory requirements. This includes, but is not limited to the following:

1. Ministry of Energy – Project concept, approval and implementation.
2. Ministry of Finance – Project financing and tax exemption.
3. Energy Commission – Project approval and energy licensing issues.
4. Environmental Protection Agency (EPA) - Environmental permitting procedures.
5. Public Procurement Board – Procurement of project machinery, contract and consultancy service providers, amongst others.
6. Ghana Water Company – Provision of water at Project site for construction, plant operation, fire fighting, drinking, within others.
7. Aboadze Traditional Authorities – Project land/site acquisition.
8. Shama District Assembly – Site clearance permit, building permit, provision of waste management services, and relevant district information on tourism, health, population, amongst others.
9. Electricity Company of Ghana (ECG) – Power purchase issues and temporary power for construction.
10. GRIDCo – Interconnection to national grid system for IPP owners.
11. VRA – Possible arrangement for provision of shared facilities for alternative fuel supply, use of Single Point Mooring (SPM), waste oil disposal, fire management, oil spill management and worker health/hospital services.
12. Ghana Police – Security issues.
13. Regional Hydrological Department (Western Region) – Baseline study for plant water requirements.
14. RIMOG and Sub-Consultants - Underground water supply consultations.
15. Ghana Maritime Authority – Discharge/intake pipeline permit.
16. Land Valuation Division of the Ghana Lands Commission (Sekondi Office) – Registration of land lease agreement and deed, valuation for compensation payments; provision of advice and working with AEL with respect to grievance management for the Project.
17. Chief and Elders of the local areas (including Nana Kobina Atom III – Chief of Aboadze where the Project is located, as well as Chiefs of Abuesi, Dwomoh, Chief Fisherman etc).
18. Aboadze Community.
19. Aboadze Royal Family – Compensation beneficiaries (owners/farmers of crops and unused infrastructure within the Project's site).
20. Nyametease village.
21. Malam village.



22. Local Cuisine Catering Services Limited.
23. Kwaku Anlo village.
24. Cluster of five town houses beyond the Anankwari River (west of the site).
25. Single house and beach house beyond the Anankwari River.
26. Two bedroom house being built beyond the Anankwari River.
27. Jiki Orphanage.
28. Landowners of neighbouring three parcels of land, adjacent to the eastern boundary of the site.
29. VRA.
30. Abuesi town.
31. Inchaban town
32. Neighbouring prospective projects.

3.1.2 The Project is also being undertaken in accordance with international standards, including but not limited to those of the World Bank Group, including Multilateral Investment Guarantee Agency (MIGA) / International Finance Corporation (IFC) Performance Standards, US Overseas Private Investment Corporation (OPIC), African Development Bank (AfDB), European Investment Bank (EIB) and Equator Principles.

3.2 National Legislative Requirements

3.2.1 An initial ESIA was prepared in July 2014 to meet the requirements of the Ghanaian EPA Act (1994) Act 490 and associated Acts relevant to protection of the environment, social wellbeing and electricity regulations. The initial ESIA was preceded in July 2013 by an ESIA Scoping and Terms of Reference stage, in accordance with national Environmental Impact Assessment regulations. The EPA issued the Environmental Permit for the Project, to AEL, 23rd July 2014.

3.2.2 EPA required that there must be a community consultation during the project scoping stages and subsequently a public hearing; where the project is presented (copies of ESIA made available to the public), concerns and issues raised about the project are addressed to the satisfaction of the community and EPA. EPA thereafter, as part of the public disclosures, supervise the publication of the notice of the project in the national dailies and request that the public provide concerns/comments on the project, and ensure that satisfactory mitigation measures are approved by EPA prior to the final approval by the Technical Committee of the EPA. The AEL had followed this due process, see Appendix A.

3.3 International Standards

3.3.1 The ESIA has since been updated in order to develop the assessment in accordance with the international standards that may apply to the Project. A copy of the Non-Technical Summary of the Updated ESIA has been disclosed in Aboadze, at the Aboadze Community Centre (located on Nana Kobena Attom III Street). An ESIA Addendum, capturing the updates, will be presented to the EPA in due course. EPA has explained to AEL that this will not alter the status of the existing Environmental Permit; any new conditions will be added to the permit schedule.

3.3.2 The principles that are adopted by AEL in regard to stakeholder engagement and information disclosure are presented below.



- 3.3.3 Stakeholder engagement, consultation and disclosure are essential requirements of IFC policy as detailed in the IFC's Access to Information Policy (2012), IFC's Performance Standards (2012) and the IFC Stakeholder Engagement handbook (2007). Parsons Brinckerhoff has reviewed a number of other prospective Lender's requirements (including those of Equator Principles, MIGA, OPIC, EIB and AfDB). With respect to this Project, the standards were found to be broadly in line with those of the World Bank Group/IFC and thus are not repeated here.
- 3.3.4 Performance Standard 1 establishes the importance of:
- (i) Integrated assessment to identify the environmental and social impacts, risks, and opportunities of projects;
 - (ii) Effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them; and
 - (iii) The client's management of environmental and social performance throughout the life of the project.
- 3.3.5 IFC Performance Standards 2 through 8 establish objectives and requirements to avoid, minimise, and where residual impacts remain, to compensate/offset for risks and impacts to workers, Affected Communities⁶, and the environment.
- 3.3.6 A summary of the key requirements of IFC Performance Standard 1 for Stakeholder Engagement and Information Disclosure has been presented below:
- Identify the range of stakeholders that may be interested in the company's actions and consider how external communications might facilitate a dialogue with all stakeholders including identified Affected Communities for a project of this nature meeting the relevant requirements as described below.
 - Develop and implement a SEP that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities.
 - Provide Affected Communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.
 - 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.
 - For projects with potentially significant adverse impacts on Affected Communities, conduct an Informed Consultation and Participation (ICP) process which is a more in-depth exchange of views and information, and an organised and iterative consultation, leading to incorporating into the decision-making process the views of the Affected Communities on matters that affect

⁶ Local communities of men, women and children who will be affected in any way by a project/development.



them directly. The process should be documented and inform those affected Communities how their concerns have been considered.

- For projects with adverse impacts to Indigenous Peoples, engage them in a process of ICP and in certain circumstances obtain their Free, Prior, and Informed Consent (FPIC). Performance Standard 7, Indigenous Peoples provides the definition of the special circumstances requiring FPIC.
- 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.
- Where there are Affected Communities, establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances. Inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.
- Provide periodic reports to the Affected Communities on the progress of implementation of relevant project action plans (as applicable) and on issues that the consultation process or grievance mechanism have identified as a concern to those Affected Communities. Relevant material changes on issues of concern to the Affected Communities, will be communicated to them. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.

3.3.7 These standards highlight the need for on-going stakeholder engagement, which should be meaningful and unbiased and the findings communicated through a document such as this SEP. The SEP developed is commensurate to the nature of the AEL Project and its associated environmental and social impacts, and the level of anticipated public interest.

3.3.8 In line with the standards set out in the IFC Stakeholder Engagement handbook, AEL will adopt the key GIIP principles of effective engagement, information disclosure and consultation as summarised as follows:

- Providing meaningful and objective information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of and in support of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, ethnic, vulnerable and/or minority groups;



- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people's concerns, suggestions and grievances;
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders; and
- On-going as required during the life of the project.

Lenders' Disclosure Requirements

3.3.9 OPIC require sixty day disclosure of the ESIA on its website for this Project, which it would be categorised as a Category A project.

3.3.10 Likewise, MIGA also disclose a brief summary of its review findings and recommendations: the Environmental and Social Review Summary (ESRS). The ESRS usually includes the rationale for categorisation of a project, a description of the main social and environmental risks and impacts of the project, and the key measures identified to mitigate those risks and impacts, specifying any actions that will need to be implemented. Along with the ESRS, MIGA may make available electronic copies of, and where available, Web links to, any relevant social and environmental impact assessment documents prepared by or on behalf of the client. The ESRS is released no later than sixty days, in the case of Category A projects.

3.3.11 In the case of the EIB, it usually publishes project summaries of all investment projects at least three weeks before the project is considered for approval by the EIB's Board of Directors.

3.4 General Stakeholder Communication Records Maintenance

3.4.1 Communication records will be maintained by AEL clearly logging the key information provided to stakeholders and also the key incoming/outgoing communications (i.e. general questions, complaints and responses etc.) to AEL along with a summary of actions taken.

3.4.2 As part of this communications procedure, AEL will record and update these stakeholder engagement activities on an on-going basis. Appendix D provides the register template to be used and updated.

Reporting

3.4.3 On an annual basis, AEL will produce a report on their social and environmental performance, including monitoring of the Environmental and Social Management Plan (ESMP) against agreed indicators and targets and also report on resolution of grievances associated with the project. This will be carried out in line with the Ghanaian EPA permit. AEL will also undertake its own formal internal reporting on a monthly basis during the life of the project i.e. once in construction.



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SECTION 4

STAKEHOLDER IDENTIFICATION



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4 STAKEHOLDER IDENTIFICATION

4.1 Identification of Main Stakeholders

4.1.1 This section of the SEP identifies interested parties i.e. stakeholders and others affected at a local, district and regional level.

4.1.2 Stakeholders could also be individuals and organisations that may be directly or indirectly affected by the Project either in a positive or negative way, who wish to express their views.

4.1.3 In order to identify key stakeholders, the following definitions have been applied:

- **Stakeholders:** any person, group or organisation with a vested interest in the outcome of a body of work; and
- **Key stakeholders:** any stakeholders with significant influence on, or significantly impacted by, the work and where these interests and influences must be recognised if the work is to be successful.

4.1.4 There are partnerships and formal advisory arrangements and also less formal but important relationships with groups or individuals with a particular interest in the work AEL undertakes.

4.1.5 Stakeholders can be grouped into the following categories:

- International (e.g. investors and shareholders);
- Government (e.g. Ghanaian state, regional and local bodies);
- Advisory non-government;
- Services / suppliers / third party contractors;
- Clients;
- Other Institutions (e.g. universities, polytechnics, think tanks);
- Power and Energy Sector (e.g. trade bodies and associations);
- Internal stakeholders (e.g. company representatives and employees);
- General communities (e.g. villages and towns in close proximity to site);
- Public group representation (e.g. for nearby hospital, local schools, national heritage sites, non-governmental organisations (NGOs)); and
- Media.

4.1.6 If stakeholders are not on the list and would like to be kept informed about the project, contact should be made with the AEL Project Development Manager with responsibilities for stakeholder communications (contact details are provided on Page 3 of this document).



4.2 Stakeholders Identified during the Development of this Plan

Stakeholders Review

- 4.2.1 During the course of this project a number of stakeholders are regularly being engaged, including regulatory bodies, government ministries, and communities along with others. These stakeholders will continue to be engaged throughout the development of the project.
- 4.2.2 All the key stakeholders identified are presented in Appendix B. This table will be updated if new stakeholders are identified during the course of the project.



SECTION 5

STAKEHOLDER RELATIONS AND APPROACH



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5 STAKEHOLDER RELATIONS AND APPROACH

5.1 Overview of Current Stakeholder and Community Relations

5.1.1 AEL will continue to communicate with the communities in the Project area. As is typical in Ghana, this will be through the Chiefs and Community Leaders and Key Opinion Leaders (influential people in the community). At meetings, AEL have regularly performed PowerPoint presentations to provide a visual aid during these meetings. AEL will aim to be open, honest and have a positive impact on its stakeholders in the communities where the plant is proposed to be built and also the wider stakeholders including its customers, employees, suppliers and business partners when the plant becomes fully operational. The principles of ICP will, where deemed necessary, be applied. IFC PS7: Indigenous Peoples does not apply to the Project as determined in Section 9 of the ESIA. As such implementation of FPIC will not be required.

5.2 Public Disclosure

5.2.1 In accordance with the EPA Act 490 (1994) Regulation 16 of the EPA, the ESIA for the CCGT project has been disclosed to the public through advertisements in the national newspaper, 1st May 2014; publication of the ESIA on the EPA website; and available for review at the EPA head-office library in Accra, the Shama District Assembly and the EPA Regional Office. These advertisements invited members of the public to submit complaints, concerns and contributions about the proposed project. This process was supervised by the EPA before the approval of the ESIA and the issue of the Environmental Permit.

5.2.2 The Non-Technical Summary of the Updated ESIA (issued March 2015) was placed on display in Aboadze Community Centre on 20th March 2015 and remains there for members of the community to access to date. Prospective lender disclosure is also underway.

5.2.3 The overriding issue raised by these communities to date is the high rate of unemployment amongst the young, and the hope for jobs that the Project carries with it.

5.3 Public Consultations

5.3.1 As part of the ESIA process, there have been a number of public consultation meetings held with the communities. A summary is provided in the Table 2 below:

Table 2. Public consultation/engagements carried out to date

Date	Meeting Agenda	Location	Attendees
06/06/2013	Meeting with the chief and elders of Aboadze	Chief's house	Nana Kobina Atom III.
23/06/2013	A scoping exercise as part of the ESIA process to ascertain the environmental and social impacts of the project and appropriate mitigation measures to address them.	Palace of Nana Kobina Attom II, Aboadze	Aboadze community members, Assemblymen and chiefs.



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Date	Meeting Agenda	Location	Attendees
16/08/2013	First round of formal consultation for the ESIA	Chief's house	AEL site landowners/ crop owner's within the site (Aboadze Royal family)
03/09/2013	First round of consultation during the ESIA	Nyametease village	Nyametease residents
03/09/2013	First round of consultation during the ESIA	Malam village	Malam Shehu Hasan (owner of lone building block)
03/09/2013	First round of consultation during the ESIA	Kwaku Anlo village	Village residents
03/09/2013	First round of consultation during the ESIA	Local Cuisine Catering Services Limited	Eva Addoquaye (owner)
30/09/2013	Informative consultation right from the initial stages of the project (after the official search of the ownership of those land from the Lands Commission in June 2013)	Three land parcels (southeast of the AEL site)	Land owner's/representatives of land parcels
06/10/2013	Second round of consultation with Kwaku Anlo village	Kwaku Anlo village	Head of households of the village
15/11/2014	Presentation on the progress of the AEL project	AEL's Office in Accra	Key member of the Aboadze Royal Family (Landowners) and elders of the Aboadze Community
26/11/2014	Presentation on the progress of the AEL project and subsequent site visit was undertaken	Shama District Assembly offices	District Chief Executive (DCE), representatives of the Shama District Assembly, communities' leaders and opinion leaders
10/12/2014	Consultation to find out the status of the village relocation. Expected to begin in 2015.	Kwaku Anlo village	Madam Grace Atsupe Kumordzi (sister of village founder) and three other members of her household; the Secretary to the Royal Family was also in attendance.
21/12/2014	Presentation of Project progress and timeline.	Nyametease village	Mr. Joseph Anani, son of village founder – considered to be the spokesperson of the village.
21/12/2014	Informative	Beach	Mr. Kun (owner).



Date	Meeting Agenda	Location	Attendees
	consultation to provide update of AEL project status.	house/flats (west of Anankwari River	
22/12/2014 & 23/12/2014	Second round of consultation following the ESIA	Kwaku Anlo village, Local Cuisine, Nyametease Village and the five – town houses west of the AEL site boundary across the Anankwari River	Residents Head of Households
Numerous	Corporate Social Responsibility ⁷	Various locations in Aboadze	Community members including Royal Family, NGO and beneficiaries.
26/04/2015	Lender's visit with EPA and Energy Commission	EPA and Energy Commission offices, Accra	Representatives from EPA, Energy Commission, OPIC, MIGA, Mott MacDonald, Parsons Brinkerhoff, AEL.
27/04/2015	Lender's visit with VRA to discuss the SPM	VRA plant offices	Representatives from VRA, OPIC, MIGA, Mott MacDonald, Parsons Brinkerhoff, AEL.
27/04/2015	Lender's visit with local community	VRA Clubhouse	Representatives from community, OPIC, MIGA, Mott MacDonald, Parsons Brinkerhoff, AEL.

5.3.2 Going forward, AEL will endeavour to formally minute meetings so that it has a comprehensive record of topics discussed. Parson's Brinkerhoff to provide a meeting minute template for such meetings.

5.4 Summary of local receptors, stakeholder meetings, views and feedback

5.4.1 The key predicted social impacts identified during the ESIA process, from project preparation through to its operational phase, have been summarised below:

⁷ AEL has undertaken various corporate social responsibility activities in the Aboadze community.



- a Economic displacement due to loss of land and/or cultivated areas occupied by the Project;
 - b Effects on fishing communities with regards to the offshore pipeline;
 - c Issues arising from access to land and the sea;
 - d Effects from noise and air quality (refer to these chapters);
 - e Indirect effects on tourism from landscape or visual perspective;
 - f Effects on cultural heritage including festival or historical sites;
 - g Increase in traffic;
 - h Employment opportunities;
 - i Increase in residential land values due to demand for worker housing;
 - j Influx of migrant workers and effects on local population, including competition for housing and services;
 - k Competition for food supplies leading to an increase in prices;
 - l Growth of local economy;
 - m Disruption of local communities with an increase in crime and anti-social behaviour; and
 - n Increase in prostitution leading to higher risk of sexually transmitted infections.
- 5.4.2 These impacts, in relation to the socio-economic characteristics of the region and project site are described in Section 9.15 of the 2015 Updated ESIA.
- 5.4.3 A summary of the local receptors along with their views and feedback has been provided below.
- Aboadze Township*
- 5.4.4 Aboadze Township lies 2 km east of the AEL site. Aboadze is a relatively undeveloped, rural fishing community. The shoreline in the village and the near-shore area is almost completely taken up by canoes. It is a very lively, close-knit community, with a sizeable number of children. The town of Aboadze has seen an increasing trend in population density over time.
- 5.4.5 Most of the population in the Aboadze area is either engaged in fishing (men), trading (women) or in school (children). Most of the youth are into commercial driving or buying and selling hence they are in full expectation of being employed on skilled jobs in the new projects in the area.
- 5.4.6 A formal community consultation programme which took place on 23rd August 2013 in the Chief's Palace, was carried out to introduce the project and determine community appreciation and acceptability of the project. It was also meant to solicit the views and expectations of community members with regard to the kind of relationship to be established between the project developers and the Aboadze community as landlords.
- 5.4.7 The chief in his opening remarks indicated to the community that this is a requirement for project development. He underscored the need for people to give their views in order to get clearer understanding of the project most especially the potential employment opportunities for their youth and what community projects the developers



could provide. He said when it comes to the discussion forum; he wants frank and open views without any hidden agenda.

5.4.8 The programme consisted of a slide show presentation by AEL followed by an open forum for discussions, contributions, as well as questions for clarification on various issues bordering on the project.

5.4.9 The slide presentation included:

- Project Information: Capacity, Location and type of technology.
- Ongoing Studies: Geotechnical Studies, Baseline Air and Water Studies, Environmental and Social Impact Studies.
- Construction Activities: Site Clearance, Civil Works, Mechanical and Electrical Installations.
- Employment Opportunities: Heavy Truck Drivers, Masons, Carpenters, Steel Benders, within others.
- Community Relations: Corporate Social Responsibility.

5.4.10 Various members of the community contributed during the consultation by expressing their views. The members included Mr. Kofi Anum, Nana Adams Adufo, Mr. Menash (Assemblyman), Cecilia Aku Mensah Eshun, among others.

5.4.11 Various topics and recommendations were provided by these community members, in relation to employment, the improvement of electricity supply in the area, training to be provided to the local community, among others. All were annotated by AEL and included in the ESIA submitted and approved by the Ghanaian EPA.

Kwaku Anlo Village

5.4.12 The Kwaku Anlo village is made up of 4 thatched mud houses, located 910 m north of the Project site and falls within the proposed site boundary of the Ghana 1000 project.

5.4.13 The villagers are subsistence farmers. There is a planned relocation of the villagers by VRA. During AEL's consultation with the residents, they indicated that they have been informed by the Ghana 1000 project (through VRA) and that they will be relocated in 2015.

5.4.14 There were three formal consultations with the residents of Kwaku Anlo Village. The initial consultation was undertaken in September 2013 with the Founder – Kwaku Galo (Anlo) representing the households. AEL presented details of the Project in order to solicit their views and concerns about the Project. The Kwaku Anlo residents expressed their support for the Project and looked forward to its commencement in order to present an opportunity for employment of their children.

5.4.15 In October 2013, further consultation was sought, by AEL, to ensure that all the significant residents of the village were provided with information about the Project.

5.4.16 The most recent formal consultations took place in December 2014 to determine the status of the relocation of the village. It was indicated that the villagers have been informed about the imminent relocation as part of the development of the Ghana 1000 project.



Nyametease Village

- 5.4.17 The village lies 1.5 km north-north east of the Project site, close to the Inchaban – VRA Power Plant road and the site for the proposed Jacobsen IPP. The village consists of six households, with a total population of 41. There are eight landcrete buildings and one incomplete sandcrete building at foundation stage. Potable water is available in the village through a standpipe. The village is also connected to the national grid.
- 5.4.18 AEL held discussions with the Nyametease community on two occasions. During the first meeting (September 2013), AEL presented the details and location of the Project and explained the potential impacts. During the consultation, it was understood that the people of Nyametease would be relocated by the developers of the Jacobsen IPP.
- 5.4.19 Further consultation took place in December 2014. During this meeting, AEL presented the latest progress update to the villagers and explained the anticipated construction timetable.

Malam Village

- 5.4.20 The Malam village is located next to the Local Cuisine Company and in proximity to the Nyametease village (described above).
- 5.4.21 During the consultation with the residents of Malam village on 3rd September 2013, the residents stated they were aware of the AEL power plant project (although the Jacobsen project site is closer) and expressed enthusiasm that it would bring employment opportunities to residents and also an opportunity to potentially engage in trading. The owner of the lone building block, Malam Shehu Hasan envisaged the possibility of some workers renting part of his facility (currently uncompleted) during the construction phase of the project.

New Buildings West of Anankwari River

- 5.4.22 There are a cluster of five town houses on one compound, located 330 m from the western boundary and beyond the Anankwari River. Consultation with the owner of this facility on the 21st of December 2014 revealed that, apart from one unit, the remaining four are still under construction (fitting & fixtures) and remain unoccupied.
- 5.4.23 The owner has expressed his willingness to lease out the facility to AEL management, once discussions and an agreement has been established on the lease.

Local Cuisine Catering Services Limited

- 5.4.24 Owned by Eva Addoquaye, the company consists of metal container offices (made of steel) some construction of sandcrete blocks and a wooden shed. From discussions on 3rd September 2013 (during the first round of consultation during the ESIA) with the owner, she welcomed the project and is looking forward to the economic advantage it would bring to the business.

Jiki Orphanage

- 5.4.25 This is an old site of an orphanage approximately 1.3 km north east of the Project site. During initial consultation, it was determined that this receptor is being relocated to a larger facility, to be built by the developers of the Jacobsen IPP.



- 5.4.26 From these consultations, it was determined that the nearby communities in the immediate vicinity of the project area are not candidates for physical resettlement. Relocations in the area are attributed to the other IPP projects in the area and as such, will be managed by those IPP's. From these consultations, the view is that communities will appreciate the advantage of the presence of the migrant workers especially during the construction phase of the project.
- 5.4.27 Further consultations (second round as well as third round of consultations during and following the ESIA) have been undertaken to keep the community up to date with the status of the AEL project.
- AEL's offices in Accra*
- 5.4.28 A presentation was held on 15th September 2014 to the key member of the Aboadze Royal Family (landowners) and elders of the Aboadze Community in AEL's Offices in Accra. The presentation covered Project progress and the milestones to be achieved. This was essentially an informative session to keep the Royal Family up-to-date on the project.
- Shama District Assembly*
- 5.4.29 During the ESIA stage, a PowerPoint presentation on the progress of the Project was made to the District Chief Executive (DCE) and representatives of the Shama District Assembly; the communities' leaders and opinion leaders of the surrounding communities on 26th November 2014 after which there was a site visit with the attendees. The presentation provided an update on the Project progress and the milestones to be achieved. This was also an informative session to keep the Shama District Assembly and the Aboadze community up-to-date on the Project.
- Fruit Tree and Foundation owners within AEL site*
- 5.4.30 After identifying the presence of unused and uncompleted infrastructure and coconut trees in the AEL site, consultations with the relevant stakeholders / owners were carried out on 16th August 2013. Through the consultations it was identified that there were five stakeholders who owned the trees and the abandoned infrastructure.
- 5.4.31 As part of the lease, AEL engaged the Land Valuation Division of the Ghana Lands Commission (Sekondi Office) in order to determine the compensation to be paid for the trees and the identified infrastructure within the site, including a salt pan and an abandoned building foundation. A "Valuation of Crops & Others for Compensation Payment" report has been prepared by the same Land Valuation Division and AEL, to ensure that the relevant stakeholders were compensated properly (see Volume II of ESIA).
- Landowner's of three land parcels (southeast of AEL site boundary)*
- 5.4.32 There are three adjacent parcels of land found south east of the AEL site boundary, within the area where the overhead transmission lines will be built by GRIDCo.
- 5.4.33 The strip of land used for the LCO pipeline and road is a separate piece of land and does not affect these three landowners.



5.5 Community Meetings – Various Locations

5.5.1 Additional consultation was conducted on 22nd and 23rd December 2014, with a series of meetings with communities in the wider area of the AEL site, namely Local Cuisine Catering Services Limited; Nyametease Village; Kwaku Anlo Village; the orphanage; and owners of the five new town houses, new single residence and renovated two bedroom house (west of the AEL site boundary across the Anankwari River). Project progress and the next stages of the project were discussed. In addition, there continue to be discussions regarding the possibility of renting some of the new housing facilities for senior workers.

5.6 Corporate Social Responsibility

5.6.1 Amandi has been actively supporting Aboadze and other communities in a range of ways including donating a computer class to the Aboadze youth center and two schools in the Shama district, donating sewing machines and barbering equipment for the local NGO, supplying professional courses, providing a scholarship for the top student for medicine school.

5.6.2 AEL will work on formalising its CSR plans, separate to this SEP.

5.7 Summary of Engagement with Authorities

5.7.1 A summary of engagement with Ghanaian regulatory bodies is summarised in the Table below.

Table 3. Summary of engagement with regulatory bodies

Body Entity	Activity	Status	Comment
Ghana Lands Commission	Deed registration of Project Land	Completed	50-year lease agreement signed with the Aboadze royal family who own the land was registered with the Ghana Lands Commission – Sekondi (Western Regional Office)
	Valuation, determination and payment of compensation	Completed	Land Valuation Division of the Lands Commission was engaged to determine the quantum and payment of compensation to the project affected people
Shama District Assembly & Energy Commission	Site clearance permit	Completed	Site Clearance permits for the plant site has been secured from both the Shama District Assembly and the Energy Commission.
Energy Commission	Provisional generation license	Completed	Provisional license obtained from the Energy Commission to engage in the production of electrical energy.
Energy Commission	Construction license	Ongoing	Upon securing the necessary permits, a Construction Permit license will be obtained from the Energy Commission to allow construction to commence. The request will be submitted once the



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Body Entity	Activity	Status	Comment
			layout of the Project is finalised.
Shama District Assembly	Building Permit	Ongoing	AEL is working on securing a building permit from the Shama District Assembly to allow for the construction of the AEL power plant.
Energy Commission	Operational license	-	To be obtained upon successful completion of construction.
GRIDCo	Evacuation study	Completed	GRIDCo completed a Power Evacuation Study and submitted a report to AEL stating their potential ability to evacuate power from the Project Site.
GRIDCo	Generator Connection Agreement	Completed	Signed with GRIDCo
Ghana Gas Company Limited	Gas Supply Agreement (GSA)	Ongoing	A Memorandum of Understanding has been signed with Ghana Gas for the supply of gas; talks are currently ongoing with Ghana Gas and WAGP Company for a future GSA contract. However, the base case is that LCO will be the initial primary source of fuel.
VRA	SPM	Ongoing	A Joint Service Agreement (JSA) was initiated with VRA to allow AEL the use of the VRA SPM.
VRA	Shared access road	Ongoing	Part of the JSA
VRA	Fuel pipeline corridor	Ongoing	Part of the JSA
EPA	Environmental and Social Impact Assessment (and Addendum)	Completed	The ESIA report has been submitted and AEL have received the Environmental Permit on the 23 rd July 2014.
ECG	Power Purchase Agreement (PPA)	Completed	The PPA was signed in July 2013. Technical schedules will be completed once the EPC contract is finalised.
Public Utility & Regulatory Commission (PURC)	Agreement of tariff with Public Utilities Regulatory Commission	Completed	Schedule 1 (the tariff schedule) of the PPA was signed in March 2014.
Ministries of Energy & Finance, Attorney General's Department	Government Consent and Support Agreement (GCSA)	Completed	AEL has negotiated the GCSA with the Ministry of Energy, the Ministry of Finance and the Attorney General. The GCSA and the Deed of Acknowledgement and Consent Agreement were approved by the Cabinet. It was subsequently



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Body Entity	/	Activity	Status	Comment
				approved by Parliament in Ghana December 2014.



SECTION 6

STAKEHOLDER ENGAGEMENT PROGRAMME



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6 STAKEHOLDER ENGAGEMENT PROGRAMME

6.1 Disclosure of Information

Approach

6.1.1 The types of information to be disclosed and the specific methods of communication to be undertaken by AEL are summarised in the draft Stakeholder Engagement Programme in Appendix C.

6.1.2 Information that is disclosed is assessed on a specific project by project basis. The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the activities, performance, development and investment plans and their implementation. For this project, the information that is proposed to be communicated is provided in Appendix C. As the project develops, the nature of stakeholder engagement programme may be modified to meet any changes.

6.1.3 To date, the ESIA had been advertised in the national newspaper inviting complaints, concerns and contributions from residents and interested parties for a month (copies made available in the Shama District and the EPA Regional Office). This process was supervised by the EPA before the approval of the ESIA and the issue of the Environmental Permit.

6.1.4 Other relevant documents to be disclosed include:

- Disclosure Non-Technical Summary: Done - Displayed in Aboadze (Aboadze Community Centre, Nana Kobena Attom III Street).
- Provide EPA with an Addendum to the ESIA to reflect any changes in the updated version of the ESIA: Any additional disclosure to be decided by EPA.

The Future Programme

6.1.5 Sources for future communication of information will be presented at key locations. These will include information presented on notice boards at the site (once in construction) and the local community locations such as the Aboadze Community Centre. Sources of information will also be obtained from the AEL site office, to be located at the grounds of the construction site. Note it is custom for information disclosure to the communities to be undertaken via the Chiefs who in turn inform the entire populace, posting notices at the community centre and other public places in the surrounding communities.

6.1.6 AEL contact details are on Page 3 of this SEP; AEL will collate any comments and feedback associated with the Project.

6.1.7 All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed on the outcome. AEL will respond within 30 days, in line with the grievance mechanism outlined in Appendix E.

The future programme of engagement is presented in Appendix C; it will be reviewed and updated on an on-going basis.



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SECTION 7

REPORTING AND GRIEVANCES



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7 REPORTING AND GRIEVANCES

7.1 Monitoring and Reporting

7.1.1 Through communication channels such as ad-hoc informal meetings and periodic formal consultation meetings, AEL will monitor and provide feedback as appropriate. These are often aided with PowerPoint presentations to provide a visual context. As discussed, information to the communities will be carried out via the Chiefs who in turn inform the entire populace, posting notices at the community centre and other public places in the surrounding communities. Should future important public consultation meetings or public exhibitions be arranged at venues to enable stakeholders to participate, an open book (with pens provided) can be positioned in a suitable location for recording comments anonymously; likewise Public Grievance Forms (Appendix F) can be submitted anonymously. The information will be recorded by AEL so that a response and feedback can be made to stakeholders.

7.1.2 The objective of a grievance procedure is to ensure that all comments and complaints from any stakeholders, and other interested parties, are considered and addressed in an appropriate and timely manner.

7.1.3 A register will be kept up to date to record stakeholder comments, complaints and concerns and how the company responds. Going forward, AEL will populate template Appendix D.

7.2 Grievance Mechanism

7.2.1 At AEL the social risk management and social license to operate have become an important and indispensable part of the company's operations. This is demonstrated in the social and environmental strategy which focuses on effective stakeholder engagement, based on active participation. The company has and continues to engage the project affected communities and more importantly obtain feedback from groups affected by the company's operations.

7.2.2 In order to effectively manage the social and environmental risk, AEL has put in place a mechanism to address affected groups'/ persons' concerns and complaints. A Grievance Management Committee was put in place during the compensation process; comprising two members of the Royal Family's Land Committee, an Officer of the Lands Commission, two Officials from AEL, and the Assemblyman (Government Representative in the community). This committee will continue to function i.e. receive and manage concerns and complaints from the project affected persons in communities.

7.2.3 AEL believes that this grievance mechanism is an integral part of the stakeholder engagement process, which will consequently create a positive social environment for the company and communities to identify problems and find or craft the corresponding solutions together.

7.2.4 The committee's work is founded on legitimacy, accessibility, predictability, equitability, transparency, and compatibility with internationally recognised human rights standards.

7.2.5 AEL recognises the significance of responsibility to the society in which it operates, and is committed to ensuring that the concerns and complaints of project-affected people be addressed in a manner that is fair, objective, and constructive, through the set grievance mechanism



- 7.2.6 There is a grievance mechanism in place that will continue to be used. In addition, AEL's Project Development Manager (Environment and Social) is in regular contact with members of the community and they have unrestricted access to him any time of the day via telephone calls, email, post etc.
- 7.2.7 A grievance mechanism will be adopted as presented in Appendix E, in which the grievance form, presented in Appendix F will be used as required to handle grievances from non-employees and employees. The assessment of grievances will be carried out in accordance with any national requirements and responses will be provided within one month on a grievance being lodged. The mechanism will be as follows:
- Grievance received;
 - Grievance recorded in a register;
 - For an immediate action to satisfy the complaint, the complainant will be informed of corrective action;
 - Implement corrective action, record the date and close case;
 - For a long corrective action, the complainant will be informed of proposed action; and
 - Implement corrective action, record the date and close case.
- 7.2.8 A grievance should be recorded by the complainant using the grievance form below, ensuring that contact details are provided with the preferred method and language of communication. The grievance will be made available and accessible. A clear description should be provided of the incident or grievance. AEL will respond to grievances within one month of receiving the form. Any verbal grievances will also be logged and responded to in accordance with the requirements above.
- 7.2.9 As it is likely that the construction contractors will have contact with local communities and other Project stakeholders who may regard the contractors as a representative of the Owner, the contractors will be expected to abide by the same grievance mechanism and pass on any grievances to AEL to be dealt with. This will be done to ensure that all external communications received in relation to the works are responded to and managed appropriately by AEL.
- 7.3 Roles and Responsibilities**
- 7.3.1 AEL's Project Development Manager (Environment & Social) has overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process, communications with identified stakeholder groups, collecting and processing comments/complaints, and responding to any such comments and complaints. Depending on the nature of a comment/complaint, some comments or complaints will be provided to the appropriate person in the company for a response. Once the Project is in construction, this manager (or designate) will also be in charge of ensuring that any external grievances received by the contractor are dealt with by AEL (via the sponsor owner construction management company). The contractors will establish their own internal grievance mechanism for workers; this will be overseen by AEL to ensure it follows the mentioned requirements and is properly implemented.



SECTION 8

CONCLUSION



8 CONCLUSION

8.1 Summary

8.1.1 AEL has since project initiation consulted and engaged with the local communities, including those individuals living in proximity to the project site as well as the larger towns in the wider vicinity. The communities were found to be very familiar with the potential impacts of power projects, given their proximity to the existing VRA Takoradi plants.

8.1.2 Consultation has occurred during the scoping phase, and been ongoing during the detailed ESIA phase and then when the ESIA was updated in 2015. The processes established to date and detailed in this SEP will be continued throughout the financing, construction and operational stages as the project progresses.

8.2 Next Steps

- Disclose Non-Technical Summary (Done).
- Formally minute meetings – Parsons Brinckerhoff to provide template.
- Track actions – via the template presented in Appendix D.
- Provide EPA with an Addendum to the ESIA to reflect any changes in the updated version of the ESIA.
- Engage with Inchaban Town – To be formally consulted ahead of movement of construction vehicles.
- Document and plan future corporate social responsibility activities.



APPENDICES



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Appendix A: EIA Permitting Process

The Environmental Protection Agency (EPA) Act 1994, Act 490 and Ghana Environmental Assessment Regulations 1999, LI 1652 requires that undertakings likely to have significant impacts on the environment (e.g. those listed in schedule 2 of LI 1652) must register with the EPA and obtain environmental permits before commencement of construction and operations. To obtain an environmental permit one must do the following:

1. Register the Undertaking

Complete the Environmental Assessment Registration Form. This form can be purchased from any EPA Regional and District Offices or the Head office in Accra. The completed form must be submitted to the EPA Head office with a Site Plan duly signed by a licensed surveyor.

2. Screening

Upon submission of the Registration Form, EPA would within 25 days request the proponent to conduct a detailed Environmental Impact Assessment (EIA) study in order to understand fully the environmental impacts of the proposal and how they would be mitigated. This would facilitate environmentally sound decision making on the project.

3. Scoping/Terms of Reference

The first step in the EIA is for the proponent to undertake a scoping exercise which involves widespread consultations with interested and/or affected parties, in order to identify all key issues of focus and to develop the terms of reference for the detailed EIA study. The proponent is expected to prepare a Scoping Report with a draft Terms of Reference for the EIA study and submit 10 copies of the report to EPA for review and acceptance.

4. Environmental Impact Assessment

Once a Scoping Report with the Terms of Reference is accepted by the EPA, the proponent shall then commission a detailed EIA study. The proponent would be expected to submit 12 copies of a draft EIA report (called Environmental Impact Statement) to the EPA for review.

5. Submission and Review of Environmental Impact Statement

As part of the review, copies of the Environmental Impact Statement are placed at vantage points including the EPA Library, relevant District Assembly and EPA Regional Office and the Sector Ministry responsible for a particular undertaking. In addition, a public notice is issued in the national and local newspapers about the Environmental Impact Statement publication and its availability for public comments within 21 days. The EPA is mandated to conduct the review of the Environmental Impact Statement and make its decision known to the proponent within 50 working days.

6. Public Hearing

In certain cases the EPA may be required under Regulation 17 of the LI 1652 to hold a public hearing on the proposed project. These are:

- Where a notice issued under regulation 16 of the LI 1652 results in serious public reaction to the commencement of the proposed undertaking;



- Where the undertaking will involve the dislocation, relocation or resettlement of communities and
- Where EPA considers that the undertaking could have extensive and far reaching effects on the environment.

This may require a number of visits to the communities prior to the public hearing, to sensitize stakeholders, and include:

- Invitation of the communities around the project, stakeholders and the general public to a public hearing on impact of the project and its mitigation;
- May require invitation of Experts to address specific issues;
- Recording of the proceedings (photographs and video); and
- Issues raised by the public through this public disclosure are then addressed by the proponent.

Where a public hearing is held, the prescribed time for EPA actions and decision-making on the application may be extended.

7. Environmental Permitting Decision

Upon submission of a draft Environmental Impact Statement, the EPA would conduct a review of the report with the assistance of a Cross-Sectoral Technical Review Committee within 25 working days. The submitted report will be reviewed and EPA may supervise a consequent public hearing.

The following actions are required:

- Publishing of the project in the dailies for a number of days and scoping notice to the communities inviting concerns and comment on the project (impacts).
- Copies of the EIS is made available to the EPA offices for a month as part of the public disclosure processes; during which concerns and comments are invited from the public.

The outcome of the review could be one of the following:

- Environmental Permit to be issued upon finalisation of the report and submission of eight hard copies and an electronic copy
- Revision and resubmission of the draft Environmental Impact Statement
- Environmental Permit declined (objection to the project)

8. Processing and Permit Fees

The proponent shall be required to pay processing and permitting fees as prescribed by the Fees and Charges (Amendment) Instrument, 2013 (LI 2206) before an environmental permit is issued.



Appendix B: Listed Stakeholders

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
International	Sponsors – Amandi Group; Aldwych International Ltd Prospective Lenders – US Overseas Private Investment Corporation; Multilateral Investment Guarantee Agency; European Investment Bank; Nedbank, Standard Bank Advisors – Parsons Brinckerhoff, Mott MacDonald	Responsible Investment / Equator Principles / IFC Performance Standards etc. Financing Owners Engineer
Government	Environmental Protection Agency Ghana Grid Company Limited Volta River Authority Energy Commission Electricity Company of Ghana Public Utilities Regulatory Commission Land Valuation Division of the Ghana Lands Commission (Sekondi Office) Shama District Assembly Ghana Ministry of Energy Ministry of Finance WAGP Company Public Procurement Board Ghana Water Company Ghana Police Regional Hydrological Department (Western Region)	Construction license Environmental Permit Operational license Power Purchase Agreement Government Consent and Support Agreement Deed of Acknowledgement and Consent Agreement Generator Connection Agreement Joint Services Agreement Security
Advisory non-government	Non identified	
Services / suppliers / third party contractors	GE/Metka Envaserv RIMOG and Sub Consultants	EPC turnkey contractors Underground water supply consultations
Other Institutions (e.g. universities, polytechnics,	NGO - Hope for the Youth Foundation, Aboadze	



Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
think tanks)		
Power and Energy Sector (e.g. trade bodies and associations)		
Internal stakeholders (e.g. company representatives and employees).	AEL personnel	Employment rights and conditions Internal Training
General communities (e.g. villages and towns in close proximity to site and landowners)	Aboadze Royal Family Aboadze Township Kwaku Anlo Village Village within the former VRA's T4 Project Site. Malam village Nyametease Village Inchaban Esipon Town Abuesi Town Nearby land and property owner's/representatives.	Employment/business opportunities Inform local residents of the project and its characteristics, potential disruptions and measures to minimise these including ESMP
Public group representation (e.g. for nearby hospital, local schools, national heritage sites)	Local Cuisine Catering Services Limited VRA Hospital VRA Club house and township Prospective projects in the wider vicinity e.g. Jacobsen, Globeleq and One Energy	Inform businesses of potential disruptions and measures to minimise these including ESMP
Media	"Ghanaian Times" Newspaper	Disclosure of project information on national, regional and local levels to serve as a conduit for informing public and addressing potential issues pertaining to community development and enabling input of civil society into decision making processes



Appendix C: Draft Stakeholder Engagement Programme

Activity	Type of Information Disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
Completion of Updated ESIA	Overview of major ESIA changes Any additional impacts identified and additional mitigation measures proposed	Non-Technical Summary disclosed in Aboadze Community Centre.	Local community
Completion of ESMP	Provisions of ESMP and key actions	TBD	Local community, contractors
Signing of turnkey contract with an international Engineering, Procurement and Construction contractor between (GE/Metka and AEL)	Signed Contract	TBD	General public, suppliers, contractors
Obtain outstanding Permits and Licenses	Permits and Certificates available for inspection with written disclosure of the permits obtained, period of validity and coverage	Offices of AEL	Relevant authority e.g. EPA
Pre-ground-breaking ceremony, to be undertaken by local community at River Anankwari	AEL to liaise with local community regarding timing.	Pre-construction	Local community
Site preparation prior to construction	Schedule of preparation and construction and the integration of the ESMP	Public notice board at site including safety signs and others to be identified in nearby areas, information delivered to local businesses / residents through leaflets, open house meetings if required.	Local community
Engagement with authorities along transportation route	Timing of transportation	Prior to movement of heavy transport machinery	Local authorities & communities along route
Start of construction – main site and ancillary elements (LCO	Schedule of construction works, activities	Public notice board at site including safety signs and others to be identified	Local community Media

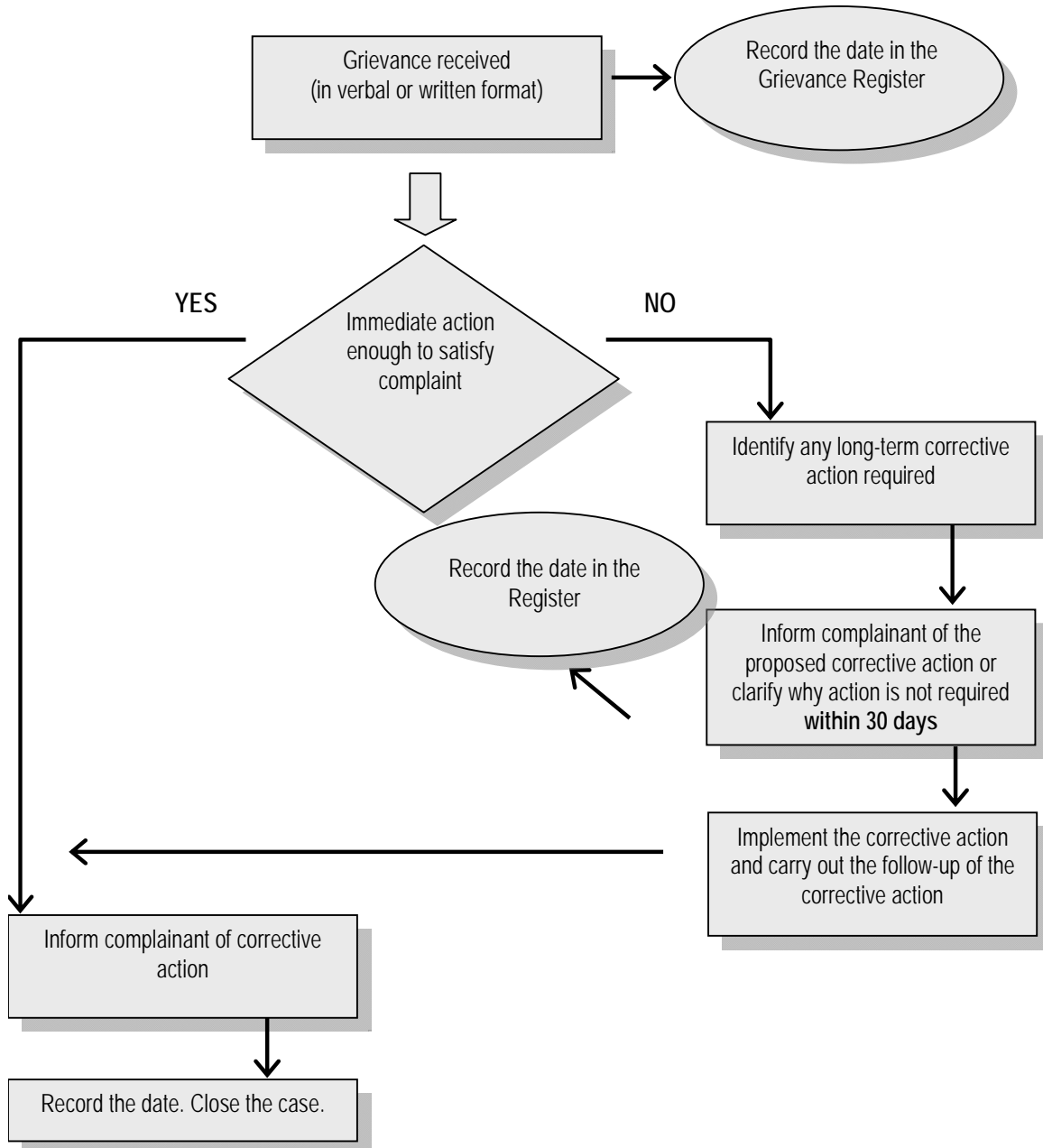


**SEP supporting ESIA:
Amandi Energy Power Project**

Activity	Type of Information Disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
pipeline, overhead voltage lines, buried water pipeline, site access road)	and progress of construction Training Traffic Management Biodiversity & Conservation Management (with respect to mangroves) Code of Conduct Construction impacts and mitigation measures (with opportunities for feedback from affected communities) managed through the ESMP	in nearby areas, information delivered to local businesses / residents through leaflets, open house meetings if required, press release.	
End of construction / start of commissioning of plant	Schedule for commissioning, traffic management	Information delivered to local businesses / residents through leaflets, open house meetings if required.	Local community
Start of operation	Plant status and running capacity, employment	Opening ceremony / day event Press release Late 2017	Local community Media
Plant decommissioning	Decommissioning Plan	20 year life - 2037	Local community
Annual reporting on implementation of action plans, issues raised at consultation meetings and resolution of grievances	Actions taken (mitigation measures) Social and environmental performance, including monitoring of the ESMP against agreed indicators and targets Types of grievances and their resolution	Community meetings / annually	Local communities



Appendix E: Grievance Mechanism





Appendix F: Public Grievance Form

Public Grievance Form

Reference No:	
Full Name (optional)	
Contact Information (optional) 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 _____
Preferred Language for communication	<input type="checkbox"/> [English] <input type="checkbox"/> [Other - specify]

Description of Incident or Grievance: _____ _____ _____	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
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Date of Incident/Grievance	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
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What would you like to see happen to resolve the problem? _____ _____ _____

Signature: _____
Date: _____

Please return this form to:
 Address: Amandi Energy Limited
 5 Osu Badu Street
 PO Box KIA-30408
 Accra, Ghana
 Tel: +233 544334141; +233 267747744
 E-mail: martinak@amandico.net