

Stakeholder Engagement Framework

**ESIA - Project One
INEOS Olefins Belgium**

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Contact

SOFÍA LÓPEZ CARRASCO
Environmental and Social Officer

Arcadis Nederland B.V.
P.O. Box 220
3800 AE Amersfoort
The Netherlands

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1 Purpose

This document supports the identification and engagement of stakeholders as required by international standards, namely Equator Principles (2020) and IFC Performance Standards (2012). This document is the framework for the engagement procedure for the project and a specific Stakeholder Engagement Plan (SEP) will be written for each phase: construction and operation. This plan will be ready a month prior to the initiation of each phase. The plan will follow this Stakeholder Engagement Framework, INEOS policies, local regulation regarding citizen's engagement and public participation and it will be aligned with international standards that serve as a framework for this Environmental and Social Impact Assessment (ESIA) process.

2 Scope

INEOS Olefins Belgium will build and operate a new world scale ethylene plant in the port of Antwerp: Project One. This involves an Ethane Cracker (ECR) unit.

To start building the installation, extensive preparatory work has been done, addressing all the needed studies regarding environment, energy and safety. This preparatory work also includes applying for the required permits, through an Environmental Impact Assessment (further: EIA) according to the European and Flemish 'm.e.r.' procedure. Additionally, financiers have requested that an Environmental and Social Impact Assessment (ESIA) process is conducted, considering that the Project also wants to comply with international standards, namely Equator Principles (2020) and IFC Performance Standards (2012).

The implementation of a stakeholder engagement process is a key requirement of these standards, which sets the foundation for ensuring that the project is socially embedded in the context in which it is carried out, develops constructive and long-term relationships between the project and its stakeholders, and promotes mutual understanding between them. Moreover, the stakeholder engagement activities developed during the ESIA should be seen as part of a much broader process of relationship-building, during construction, operation & maintenance, and demobilization phases.

Against this background, this Stakeholder Engagement Framework, has been developed in order to support the identification and engagement of stakeholders, and to promote the adequate consideration of their views, inputs and concerns about the project. This Stakeholder Engagement Framework includes four main parts:

- A description of the regulatory and policy framework (local and international) for the engagement of stakeholders, which includes the Flemish regulatory requirements, Equator Principles and the International Finance Corporation (IFC) Performance Standards;
- Stakeholder Engagement Framework, which provides an overview of the requirements applicable to Project One in the context of stakeholder engagement;
- Stakeholder Engagement Implementation Plan, which provides an overview of the concrete activities that have been, and will need to be, performed to meet the requirements; and
- Attachments, with proposed formats to be used during engagement activities

It is important to highlight that this Stakeholder Engagement Framework puts together the activities that have been already implemented in accordance with the Flemish procedure for stakeholder engagement (as part of the EIA process), with the existing policies and stakeholder engagement activities performed by INEOS Olefins Belgium on a regular basis.

3 Definitions

Items found in this document which require definition are listed below:

Item.	Definition
CMP	Contractor Management Plan
CSO	civil society organization
ECR	Ethane Cracker
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ESIA	Environmental & Social Impact Assessment
ESMP	Environmental & Social Management Plan
ESMS	Environmental & Social Management System
E&S	Environmental & Social
FEED	Front End Engineering and Design
GM	Grievance Mechanism
GRI	Global Reporting Initiative
IFC	International Finance Corporation, a member of the World Bank Group
IFC PS	IFC's Environmental and Social Performance Standards define IFC clients' responsibilities for managing their environmental and social risks
IGGN	INEOS Group Guidance Note
IPMT	Integrated Program Management Team
ITT	Invitation to Tender
NGO	Non-governmental organization
OECD	The Organisation for Economic Co-operation and Development
OSBL	Outside battery limits
PDT	Project Development Team
PS	IFC Performance Standard
SEP	Stakeholder Engagement Plan
SHE&S	Safety, Health, Environment and Security
TCFD	Task Force on Climate-related Financial Disclosures
WB EHS	World Bank Environmental, Health and Safety Guidelines

4 Reference Documents

All reference documents are listed and documented in 6.1.

5 Responsibilities

The responsibility for implementation of stakeholder engagement is part of the roles and responsibilities assigned to the Environmental and Social Management System (ESMS) team.

6 Regulatory and Policy Framework

For the development of the Stakeholder Engagement Framework, reference documents ranging from regulatory requirements through to reports on good practices and the company's policies were reviewed. In this section, an overview of the requirements for stakeholder engagement and public participation is presented.

6.1 What is Stakeholder Engagement?

Stakeholder Engagement is premised on the need to build relationships of trust and transparency between the Project proponent and the Project stakeholders, and the right of the latter to consultation and participation throughout the Project cycle. In order to achieve synergy between a proposed project and host community, it is vital to understand the social context within which a project is developed, and to set up an engagement procedure through which stakeholders can be informed, consulted, and provided with opportunities to express their concerns, questions and grievances. Through this, the necessary basis is created to build and maintain social acceptance vis-à-vis the current project, as well as potential future project activities and plans.

EIB Standards define stakeholders as those who will be or are likely to be directly or indirectly affected, positively or negatively, by a project (commonly referred to as project-affected people or project-affected communities), as well as those who might have an interest in, or may influence, the project.

Stakeholder engagement is carried out through multiple methods of interaction and consultation. These often differ according to the degree of potential impacts of a project on different groups of stakeholders, as well as the diverging levels of influence that different stakeholders exercise on a given project. The stakeholder groups that as such have been identified for the current Project, and the corresponding methods of engagement, are outlined in Chapter 7.

6.2 Stakeholder Engagement in the International Standards

Stakeholder engagement is not only good practice, but also a requirement rooted in national and international standards. For the Project this means that the stakeholder engagement requirements demanded by the European and Belgian (Flemish) legal and regulatory framework, the Equator Principles and IFC Performance Standards must be observed. Moreover, the EIB Environmental and Social Standards are used as a reference framework. Below, the respective requirements are summarized.

6.2.1 Equator Principles

The Equator Principles (EP), formally launched in 2003, is a risk management framework, adopted by Financial Institutions (FI), for determining, assessing and managing environmental and social risk in project finance. It is intended to provide a minimum standard for due diligence, a support to responsible risk decision-making by the FI. The Equator Principles have been recently reviewed and the new version has been adopted as of July 2020.

In the EP, several principles are included that address stakeholder engagement:

Principle 3: Applicable Environmental and Social Standards, states that the assessment should comply with relevant host country laws, regulations and permits that pertain to environmental and social issues. This includes IFC PS and its requirements on stakeholder engagement.

Principle 5: Stakeholder Engagement, requires to demonstrate effective Stakeholder Engagement, as an ongoing process in a structured and culturally appropriate manner, with Affected Communities, Workers and, where relevant, Other Stakeholders.

For projects with potentially significant adverse impacts on Affected Communities the Client is required to conduct a tailored Informed Consultation and Participation process that should be free from external manipulation, interference, coercion and intimidation.

To facilitate Stakeholder Engagement, the client will, commensurate with the Project's risks and impacts, make the appropriate Assessment Documentation readily available to the Affected Communities, and where relevant Other Stakeholders, in the local language and in a culturally appropriate manner. The client will take account of, and document, the results of the Stakeholder Engagement process, including any actions agreed resulting from such

process. Disclosure of environmental or social risks and adverse impacts should occur early in the Assessment process, in any event before the Project construction commences, and on an ongoing basis.

Principle 6: Grievance Mechanism, requires, as part of the ESMS, to establish effective grievance mechanisms which are designed for use of Affected Communities and Workers, as appropriate, to receive and facilitate resolutions of concerns and grievances about the Project's environmental and social performance.

It is required for grievance mechanisms to be scaled to the risks and impacts of the Project, to resolve concerns promptly, using a consultative process, at no cost, and without retribution to the party that expressed the issue or concern. The mechanisms should not impede access to judicial or administrative remedies. The Affected Communities and Workers should be informed about the grievance mechanisms during the Stakeholder Engagement process.

Principle 10: Reporting and Transparency, requires the client to ensure that a summary of the ESIA is accessible and available online and that it includes a summary of Human Rights and climate change risks and impacts when relevant.

In sum, under the scope of the Equator Principles, Stakeholder Engagement refers to the IFC Performance Standards provisions on external communication, environmental and social information disclosure, participation, informed consultation, and grievance mechanisms.

6.2.2 IFC Performance Standards

Performance Standard 1 lists Stakeholder Engagement as an essential component of the Environmental and Social Management System (ESMS), positing that Stakeholder Engagement is “the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts” (paragraph 25, IFC-PS1). To this end, a Stakeholder Engagement Plan must be developed. The following requirements apply to the current Project.

27. 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. Where applicable, the Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents.

29. 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 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.

30. 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.

Paragraph 30 further states that consultation should begin early in the process of identification of E&S risks and impacts and should be an ongoing process. Effective consultation requires the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information, provided in a cultural appropriate language and format.

31. 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. ICP involves a more in-depth exchange of views and information, and an organized and interactive consultation, leading to the client's incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The consultation process should (i) capture both men's and women's views, if necessary through separate forums or

engagements, and (ii) reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate.

In addition, International Finance Corporation published a guidance document "Stakeholder Engagement: a Good Practice Handbook for Companies Doing Business in Emerging Markets, 2007". The publication contains practical guidance on the implementation of key concepts and principles of stakeholder engagement, the practices that are known to work, and the tools to support the delivery of effective stakeholder engagement.

6.2.3 EIB Environmental and Social Standards

While IFC Performance Standards embed stakeholder engagement as part of the Assessment and Management of Environmental and Social Risks and Impacts under Performance Standard 1, EIB brings it further by outlining the principles for public participation in a separate standard.

As a public institution, the EIB actively promotes the right to access to information, as well as public consultation and participation; the right to access to remedy, including through grievance resolution, is equally acknowledged and actively promoted by the EIB. Standard 10 affirms the EIB's expectation that promoters uphold an open, transparent and accountable dialogue with all relevant stakeholders at the local level targeted by its EIB operations.

Standard 10 outlines a systematic approach to stakeholder engagement that the promoter is expected to build and maintain by way of a constructive relationship with relevant stakeholders. The requirements of Standard 10 that apply to the current project can be summarized as:

- Stakeholder engagement is planned for and carried out without discrimination, taking into account differences in risk exposure, and the increased sensitivity and reduced resilience of vulnerable groups;
- Stakeholder engagement is planned for and carried out in line with the principles of prior, informed and free engagement, and informed participation;
- Stakeholders' inputs are documented and considered throughout the project preparation and implementation phase;
- The general principles outlined in paragraph 19 are adhered to ensure effective and meaningful engagement, and consultation;
- All project stakeholders are identified, differentiated and prioritized via a stakeholder analysis, especially those identified as vulnerable;
- Assessment of the representation of communities and groups was undertaken in cases when rights-holders have limited capacity to represent their own views or may be restrained in doing so by contextual factors (traditional practices, for instance);
- Stakeholder engagement should be built into an operation's planning, including the allocation of adequate budgetary resources;
- In the case of projects with significant environmental and social risks and impacts, the ESIA process includes the involvement of stakeholders from early stages (screening and/or scoping) and consultation of the ESIA draft report;
- The extent and planning of the stakeholder engagement are systematized in a Stakeholder Engagement Plan (SEP), which is discussed with stakeholders;
- Stakeholders are provided with relevant information in a timely and appropriate manner, and this information is disclosed in the local language(s) and in a manner that is culturally appropriate;
- The information disclosed is sufficient for stakeholders to identify risks, impacts and opportunities of the project;
- Identified stakeholders are consulted at strategic decision-making points throughout the project life cycle.
- In case of the involvement of indigenous communities, the Free Prior Informed Consent (FPIC) approach was followed;
- A Grievance Mechanism (GM) is designed and implemented at the project level, onset and throughout the project life cycle;
- The GM documents and addresses concerns, using an understandable and transparent process that is culturally appropriate and readily accessible to all stakeholders, at no cost and without retribution;
- The SEP includes monitoring throughout the project life cycle; and
- Relevant reporting systems are designed and implemented.

Besides Standard 10, also other EIB Standards include requirements regarding stakeholder engagement:

- Standard 1: Assessment and Management of Environmental and Social Impacts and Risks, on the involvement of stakeholders in monitoring;
- Standard 6: Involuntary resettlement & Standard 9: Occupational and Public Health, Safety and Security, on the Grievance Mechanism; and
- Standard 7: Rights and interest of vulnerable groups & Standard 9: Occupational and Public Health, Safety and Security, on information disclosure.

Similar to IFC Performance Standards, stakeholder consultation and/or consideration on the themes of the following standards is required:

- Standard 3: Biodiversity & Ecosystems;
- Standard 5: Cultural Heritage (requiring screening of the whole draft ESIA, as IFC requires in PS1);
- Standard 7: Rights and interest of vulnerable groups; and
- Standard 9: Occupational and Public Health, Safety and Security.

6.3 Stakeholder Engagement in the Flemish EIA and permit procedures

The Environmental and Social Impact Assessment process and the implementation of the SEP should also be aligned with the Flemish and international legal and regulatory requirements. The Decree on environmental permitting, the 'Besluit van de Vlaamse Regering van 27 november 2015 tot uitvoering van het decreet van 25 april 2014 betreffende de omgevingsvergunning' (hereafter: 'Besluit Omgevingsvergunning') is the Flemish regulation particularly relevant for the Project.

Other relevant Flemish acts are:

- The Decree on environmental policy, the 'Decreet van 5 april 1995 houdende algemene bepalingen inzake Milieubeleid'; and
- The Decree concerning EIAs (hereafter: 'Besluit project-MER'), the Besluit van de Vlaamse Regering van 17 februari 2017 betreffende nadere regels voor de milieueffectrapportage over projecten en voor de omgevingsveiligheidsrapportage.

These three acts can be seen as the translation of the regulatory framework of the Environmental Impact Assessment - EIA Directive (Directive 2014/52/EU amending the EIA Directive 2011/92/EU). Where stakeholder engagement is particularly addressed in the Besluit Omgevingsvergunning, the environmental policy and Besluit project-MER only briefly mention what information should be shared with the public.

- This section first briefly looks at stakeholder engagement in the European EIA Directive. Next, it outlines how the EIA Directive is transposed into Flemish law and, finally, what is currently prescribed in the Flemish regulatory framework.

6.3.1 Stakeholder engagement in the EU EIA Directive

The EU Environmental Impact Assessment - EIA Directive, codifies the following international legislations particularly relevant for stakeholder engagement:

- UN Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters, 1998; and
- Convention on Environmental Impact Assessment in a Transboundary Context, 1997 (Espoo Convention).

Stakeholder engagement in the EIA Directive is addressed in the following articles (including amendments):

- Article 4 (5)b on the conditions for making the determination information available to the public;
- Article 6 (1) on the obligation of Member States to give authorities likely to be concerned by the project an opportunity to express their opinion on the information supplied;

- Article 6 (2) and 6 (3) on information provision to the public, including the prescription of electronically and by public notices;
- Article 6 (3) on the information that Member States are obliged to make available to the public concerned;
- Article 6 (4) on public participation;
- Article 6 (5) on the obligation of Member States to set detailed arrangements for informing and consulting the public concerned;
- Article 6 (6) on reasonable time frames for the above obligations;
- Article 6 (6)e on the timeframes for consulting the public concerned on the environmental impact assessment report (not to be shorter than 30 days);
- Article 7 (3)b and Article 7(5) on the obligation, in the case of transboundary effects, that the public in the territory of the affected Member State is enabled to participate effectively in the environmental decision-making procedures, and that Member States establish time-frames for consultations, and may make the detailed arrangements for this;
- Article 8 on the obligation that the results of consultations and the information gathered pursuant to Articles 5 to 7 shall be duly considered in the development consent procedure;
- Article 9 (1) and 9 (2) on promptly informing the public and authorities when a decision to grant or refuse development consent has been taken. This also includes the summary of the results of the consultations and the information gathered pursuant to Articles 5 to 7 and how those results have been incorporated or otherwise addressed, in particular the comments received from the affected Member State referred to in Article 7;
- Article 11 (1) on public access to a review procedure;
- Article 11 (5) on informing the public on access to administrative and judicial review procedures; and
- Introduction paragraph 29 on taking into account unsolicited comments that might have been received from other sources, such as members of the public or public authorities, even though no formal consultation is required at the screening stage, constitutes good administrative practice.

Article 6(5) of the EIA Directive states that:

‘the detailed arrangements for informing the public, for example by bill posting within a certain radius or publication in local newspapers, and for consulting the public concerned, for example by written submissions or by way of a public inquiry, shall be determined by the Member States. Member States shall take the necessary measures to ensure that the relevant information is electronically accessible to the public, through at least a central portal or easily accessible points of access, at the appropriate administrative level’.

6.3.2 The Flemish stakeholder engagement process

In the Flemish context, there is one moment of public consultation during the EIA procedure (in the scoping phase), and one consultation moment after the EIA Report has been submitted to the authorities and the permit application process is started. During scoping, the consultation is oriented to obtaining stakeholder feedback on the proposed scope of the EIA study; the second moment of consultation allows stakeholders to express their objections against a specific project. This is somewhat different from the international procedure whereby stakeholders are able to provide input and feedback to the impact assessment process (i.e., about the type and completeness of identified impacts, assessment of these impacts, proposed mitigation measures, etc.) before the EIA Report is made final and submitted to the authorities. Instead, in the Flemish procedure, stakeholders can refer to the EIA Report to formulate their arguments against the Project.

The Flemish authorities have dedicated Chapter 5 of the Besluit Omgevingsvergunning to describe the public consultation process (‘openbaar onderzoek’) that is organized as part of the Flemish permit application procedure for certain type of projects (including, amongst others, projects that requires an EIA study). This process of public consultation starts within 10 days after the decision of completeness and admissibility of the permit application.

The following stipulations are of relevance for the required consultation process for Project One:

- The Public Consultation always takes 30 days.
- It is mandatory to inform the public about the permit application as follows:

- Publication of the permit application through posters placed at the location relevant for the permit application;
 - Publication of the permit application on the website of the municipality where the subject is located; and
 - Since there is an EIA and ESR involved the permit application is announced at least in one daily or weekly newspaper with regional character
- Individually communicate the application to the involved stakeholders, living in an area of 100 m nearby the subject of application;
 - Present the application digitally or in hardcopy at the local city hall of the municipality where the subject is located.
 - The municipality will make the text used for the announcement of application, available for the public. There are minimal requirements for the content of the document prescribed.
 - The municipality publishes the text in correspondence with Article 18, on their website (Article 21). The municipality is allowed to publish more information. The text will ultimately be published the day before the start date of the Public Consultation and remains there until the last day of this disclosure.
 - When the permit application conveys a project MER (EIA) or an 'omgevingveiligheidsrapport' (environmental safety report or OVR), the municipality publishes the text, as mentioned in article 18, at least in one daily or weekly regional newspaper (Article 22). The text is ultimately published, as mentioned in the first clause, the day before the start date of the Public Consultation. The costs should be covered by the permit applicant.
 - The permit application and, if relevant, the results of the disclosure, will be digitally and/or hardcopy laid out for thirty days at the city hall of the municipality where the subject of application is located (Article 24, paragraph 1).
 - If the permit application encloses a not-yet-approved project MER or OVR, it can be digitally consulted (Article 24, paragraph 4).
 - During the first twenty days of the Public Consultation the municipality in cooperation with the permit applicant and the authorized board, organizes at least one information meeting ('informatievergadering') (Article 25). The article prescribes what people/institutions should be attending, either in person or digitally. Either a municipality or province member will take minutes of the meeting.
 - During the period of the Openbaar Onderzoek (Public Consultation), every natural person or legal person can respond and express objections in analog or via the Omgevingsloket ('environmental counter') (Article 26).
 - Interested citizens and stakeholders of the country that may experience transboundary effects, may participate in the Public Consultation as mentioned in Article 16, and/or the Public Consultation which the local authority of the country may organize on its own territory (Article 27).
 - Ultimately 10 days after the last procedures of the Public Consultation, the municipality where the object of permit application is located, will publish the records of the information meeting, as mentioned in article 25, and the positions, the remarks and objections that were filed during the Public Consultation (Article 29).

Chapter 9 of the Besluit Omgevingsvergunning also requires 'terinzagelegging' (Public Consultation) of the permit.

Finally, there are additional definitions commonly used in relation to Flemish planning and permit procedures, which are worth mentioning in this context:

- Registration of request for scoping advise ('Aanmelding met verzoek tot scopingsadvies'), or 'scoping document'
- The registration takes place prior to the permit application. Team MER will request a number of authorities (selected based on their geographical location) to advice on the scoping document. The document will be publicly disclosed.
- Draft project-EIA ('Ontwerp-project-MER' or 'Ontwerp-MER')
- The draft refers to the Environmental Impact Assessment before the approval. 'Draft' however is not the most accurate translation of this term, as it should not be a preliminary version, but a finalized version. The Flemish term will therefore be used.
- Project-EIA ('project-MER')
- The Environmental Impact Assessment after the approval. An EIA that is approved in the permit application process automatically becomes a Project-MER. It is possible to request changes after approval ('wijzigingsverzoek'), but these should concern minor changes.
- Departement Omgeving, Team MER

It is the government department dealing with environmental permitting, and the advisory board that is authorized to approve or disapprove the EIA, taking into account the advises from other authorities and the results of Public Consultation.

- Consideration Document ('Overwegingsdocument')

The document details what has been done with every comment or expressed objection during the public Consultation. Inputs from the Public Consultation may also be grouped and categorized.

6.4 Integrating stakeholder engagement for EIA and ESIA

The requirements concerning stakeholder engagement for EIA (Flemish regulations) and ESIA (international standards) differ in both the process of consultation and the content that must be disclosed to stakeholders. The aim of this chapter is to summarize the main differences and to propose several scenarios on how to address these differences by integrating stakeholder engagement for EIA and ESIA.

6.4.1 Differences in requirements for content to be disclosed to stakeholders

The major differences in term of content between the EIA and the ESIA are related to:

- The design and implementation of an Environmental and Social Management System (ESMS), as part of the ESIA process;
- The EIA process does not require the assessment of impacts and corresponding management plans on the following topics and E&S aspects:
 - Intangible Cultural Heritage;
 - Socio-economic conditions and activities, as well as land uses in the AOI;
 - Vulnerable groups;
 - Ecosystem services;
 - Labor and Working Conditions, including third party workers; and
 - Security arrangements and services.

6.4.2 Differences in the requirements for the stakeholder engagement process

Following the local regulatory framework, the draft-project-EIA is added to the permit application for Project One, and subjected to Public Consultation. In the meantime Team EIA approved the draft-project-EIA, with consideration of all comments and advices.

Flemish law prescribes that the standpoints, comments and objections of stakeholders regarding the Project, are taken into consideration in the advice of the responsible administration. The responsible administration conditionally approves or disapproves the EIA within 30 days of receipt and informs the initiator within 40 days after receipt of the decision (Article 11 of the Besluit project-MER). When approved, the draft-project-EIA automatically becomes final and changes can only be requested when minor, and only with an approved EIA, the permit can be granted¹. IFC Performance Standard 1, paragraphs 30 and 31 state that clients have to consider and respond to the comments. In other words, that means that according to IFC, stakeholders' comments should be addressed individually in the Environmental and Social Impact Assessment (ESIA). In contrast, the Flemish EIA process only prescribes that the authorized administration deciding on the permit application takes the standpoints, comments and objections of stakeholders regarding the Project, into consideration in their decision on whether or not to grant the permit.

¹ It should be noted that reports may also be attached to the permit application itself, instead of to the E(S)IA, and that these may be withdrawn from public disclosure (made confidential to the public, but available to authorities). This is not considered above as the required studies in addition to the EIA studies should all be part of the ESIA. Besides, attaching studies to the permit application does not solve the planning problem. Finally, it should be noted that the permit itself is open to all kinds of comments, whereas comments on the E(S)IA report should only be on methods and alternatives.

7 Stakeholder Engagement Planning

Considering the national regulatory requirements and methodological orientations of the IFC, EIB and Equator Principles, a general framework has been defined for the SEP, which will guide the actions of the Proponent. The framework also integrates related policies and already existing or planned stakeholder engagement activities at the corporate level as well as for the purposes of the Project. The designed framework gives expression to the concepts of "Aspiration" and "Strategy".

- **Aspiration:** to construct a relationship based on trust, transparency and collaboration between the stakeholders and Project Proponent.
- **Strategy:** to manage relationships with stakeholders by promoting access to and transparency of technical information related to the Project and its ESIA, in order to create meaningful spaces of participation. It is crucial that local stakeholders are fully informed about the Project, receive regular updates about Project progress, and are always able to ask questions, clarifications, and express their potential concerns and grievances.

7.1 Principles for Effective Stakeholder Engagement

Based on the legal and governance framework outlined in the previous section, the following principles for effective stakeholder engagement² will have to be observed for the design and implementation of Project One's SEP:

- Stakeholder identification, engagement and consultation should start early in the Project;
- Stakeholder engagement and consultation should be an ongoing process and continue throughout the project life cycle as risks and impacts arise;
- Stakeholder engagement should be *inclusive*: all stakeholders –irrespective of gender, class, caste, race, ethnicity, religion, sexuality, disability, etc. – should be enabled to participate;
- Stakeholder engagement should be accessible to vulnerable groups;
- No preferential treatment should be given to one stakeholder group over another;
- Stakeholder engagement should be *transparent and comprehensive*. In other words, procedures must be clear, clearly communicated and consistent, and all relevant project-related information should be disclosed and part of the consultation;
- Stakeholder engagement must be culturally appropriate. This means that stakeholder engagement activities are attuned to the customs, beliefs, group dynamics, and forms of interaction and communication of different social groups;
- Engagement methods and frequency should be tailored to the specific stakeholder group;
- Consultation should be a two-way process. Participation should be *meaningful*, and thus, binding. This does not mean that the suggestions and demands from stakeholders will inevitably have to be accommodated, but that the viewpoints and interests of participating stakeholders are taken serious and truly feed into (adjustment of) the project design, implementation and operation;
- The prior disclosure and dissemination of relevant information is essential to allow for meaningful and transparent consultation. The information should be easily accessible, understandable and provided in a culturally appropriate format and language;
- Consultation should be free of external manipulation, interference, coercion, or intimidation. To this end, safe spaces and mechanisms should be created through which stakeholders can feel free to express their views and concerns without fear of repercussions or retaliation;
- Meaningful participation must be enabled, i.e. stakeholders must be enabled to attend stakeholder meetings, discussion groups, etc. as well as be able to provide input and be part of an open and meaningful exchange of information and views;
- All consultations and engagement activities must be documented; The entire consultation process has to be documented;
- If E&S risks materialize, affected stakeholders should have the ability to submit a complaint. In addition, it is also possible that stakeholder simply want to ask a question or express a concern regarding the project activities, without this being a grievance or complaint. For all these cases, a transparent and accessible grievance

² These principles are amongst others derived from IFC PS1, paragraph 30 and EIB Standard 10, paragraph 19.

mechanism should be implemented. The grievance mechanism should protect complainants' integrity and respond to grievances adequately, timely and in an appropriate manner;

- Adequate assistance (if needed) should be provided to persons who seek to file a grievance;
- Periodic monitoring and review of stakeholder engagement procedures (including grievance management) is required;
- Regular communication and reporting channels should be established to receive communication from and report back to the project stakeholders.

7.2 Key Messages

Key messages and details regarding Project One can be found on the following website: <https://project-one.ineos.com/en/about-project-one/>.

Project ONE is an investment by INEOS in the Antwerp chemical sector to build an ethane cracker. The plant will produce the gas ethylene. This is one of the most used basic chemicals and a building block for products that we use daily in the automotive, construction, energy, food hygiene and medical sectors. Examples include insulation materials, medical equipment, wind turbines, packaging materials and lightweight components for the vehicles of the future.

The road to a climate-neutral future is a multi-stage race, not a sprint. With Project ONE we are already making a giant leap. Why wait for decades if we can make a huge difference today thanks to technological renewal.

The ethane cracker that INEOS wants to build in Antwerp will be so efficient that its CO2 emissions will not even be half of those of the 10% best European ethane crackers today. Compared to the average cracker, we even do three times better. This performance will lower the benchmark for steam crackers in the European emissions trading system, encouraging other players to invest more in sustainability or they will have to pay more in emission allowances. Buyers of the ethylene from Project ONE save 2 million tonnes of CO2 emissions by not having to rely on the more polluting alternative.

The key **bridging technologies** to achieve this reduction in emissions are:

- Using ethane instead of naphtha, ethane production and transportation being less harmful to the environment than naphtha.
- Hydrogen fueling: to the extent that the hydrogen that is produced by the installations is reinserted in the processes
- Highly integrated systems: use of state-of-the-art ethane cracking technology, the best available technologies (BAT) and energy integrations are consistently applied to achieve high energy and production efficiencies.
- The total external power demand of the plant will be covered by renewable electricity (off-shore wind power).

Project ONE is future-proof because we have built in the necessary flexibility to switch to additional technologies as soon as they are feasible. For example, the furnaces of the cracker and the steam boilers can run 100% on hydrogen, which does not emit carbon during combustion. The condition is that sufficient green energy is available to produce green hydrogen. The plant design includes the ability to install a carbon capture installation so that we can also use this option when the infrastructure for transport and storage is in place and the technology for capture itself is ready. We have the ambition to become net zero within ten years after start-up of the operation if the necessary technology becomes viable.

On top of that, Project ONE will create 300 permanent, high quality, jobs in Antwerp and 150 permanent contractor jobs, and will generate 5 times additional jobs in supporting industries and through different levels of the customer-supplier value-chain in Flanders, in Belgium, and across Europe.

Focused studies to identify and address potential E&S impacts and risks of the Project will be carried out in the area, which include environmental and social aspects. Careful consideration thereby needs to go out to potential impacts on affected communities and other project stakeholders.

More details on the key messages can be found on the Project One website:

<https://project-one.ineos.com/en/about-project-one/>

Related videos:

Movie on CO2 emissions and impact on ETS: <https://youtu.be/Hv-pYKnaXrw>

Explainer movie: <https://youtu.be/BbGme9dLkbA>

7.3 Stakeholder Identification

In order to achieve an appropriate understanding of the people and institutions that could relate to the project, it is important to identify all possible stakeholders.

In April 2019, a Stakeholder Management Plan (hereafter initial Stakeholder Management Plan) covering the Pre-FEED, FEED and EPC phases of the Project was developed. This was the result of a collective exercise undertaken with Project One IPMT held in March 2019, where sixty-three stakeholders were identified. Since then, the list has been regularly updated and new stakeholders are being identified.

A preliminary identification of stakeholders for the development of this Stakeholder Engagement Framework is based on the aforementioned list. However, comparing to the initial Stakeholder Management Plan, the purpose of this Stakeholder Engagement Framework is different. International Standards require that the SEP allows for establishing and maintaining a constructive dialogue between the promoter, the affected communities, vulnerable groups and other interested groups. It should facilitate identification, assessment and management of environmental and social risks, impacts, and opportunities. EIB and IFC Standards, for instance, require the identification of different stakeholder groups and mapping of these groups according to their influence on the Project and potential impact from the Project that they can experience, in order to tailor the engagement methods and techniques to the characteristics and requirements of each group. In this effort, careful consideration of vulnerable groups is required, as these groups or individuals, in the explanation of the EIB, may be “at a higher risk of being unable to anticipate, cope with, resist and recover from project-related risks and/or adverse impacts”. In other words, it is about differential exposure and resilience to impacts, and participatory dynamics. Vulnerable individuals or groups thus to be considered, include women, children, the elderly, the poor, ethnic, religious, cultural or linguistic minorities, or indigenous groups. With this understanding of vulnerability in mind, in this Stakeholder Engagement Framework vulnerable groups are left out of the specification of engagement techniques and methods. Due consideration of the possible existence of vulnerable groups or individuals in the Area of Influence of the Project has been given by the ESIA/EIA team, thereby taking into consideration the sociopolitical, economic and geographical context within which Project One is proposed to be implemented. This has led to the view that consideration of vulnerability in this context, is relevant only in relation to potential health impacts that may weigh disproportionately on, for example, children, the elderly, pregnant women, and persons with pre-existing health problems. Specific attention is given to these groups in the impact assessment considerations in the respective component of the EIA study (Health, Chapter 13 of the EIA Report), although differentiated engagement techniques were not considered necessary to this end.

Overall, the identified Stakeholders can be grouped into four overall categories:

1. **Community:** Defined here as those stakeholders that work, reside, or otherwise find themselves in the vicinity of the project and who may be, or perceive themselves to be, (potentially) affected by the Project. It also comprises organizations that represent the interests of the aforementioned groups, such as non-governmental organizations (NGOs) or civil society organizations (CSOs, e.g. neighborhood associations);
2. **Institutional:** Defined here as stakeholders who may influence and/or make decisions about the Project implementation;
3. **Internal:** Defined here as stakeholders who contribute to the implementation of the Project; and
4. **Other:** Defined here as other stakeholders related to the Project, such as project customers, suppliers, but also journalists and opinion leaders.

A preliminary identification of stakeholders for the Project, results in the following categories and groups as shown in Table below.

Table 7-1: Stakeholder categories and groups

Community	Institutional	Internal	Other
Local communities	Authorities	Employees	Customers - Users
NGOs, CSOs, other activists	Politicians	Union	Suppliers
Local residents		Owner	Financiers
			Intermediaries
			Press
			Academics-influencers
			Industry
			Neighboring companies

It is important to mention that stakeholder contact information will be updated regularly and kept in a secure database.

7.4 Engagement techniques and consultation methods

Differentiated engagement techniques and consultation methods are and will be employed by Project One, based on the above characteristics of the stakeholder groups. Commonly used engagement techniques and consultation methods often include consultation meetings that are suitable to inform individuals as well as larger groups of people. During such meetings, information about the project background, objectives, main activities, etc., is disclosed, in response to which stakeholders can express their views, questions and concerns. These meetings are generally held with the specific group that is directly related to a certain topic, to allow for a more in-depth discussion. From the interactions that are thus established with a varied group of stakeholders, valuable information can be obtained and included in the design of the project or in the environmental and social impact assessment process. This multi-faceted approach of separate meetings, can be an advantage when there is the need to focus on issues that are especially relevant for a given stakeholder group, but also to ensure a safe space where stakeholders feel free to express their views. Prior to and in parallel with the EIA study, INEOS Olefins Belgium organized and is planning to organize consultation meetings aligned with these requirements.

Other engagement techniques and consultation methods include:

- Technical information disclosure:** this refers to the dissemination of project information to the wider public. This can either be done electronically or in print/writing at several strategic public locations and in the vicinity of the project site. Project-related information that should be disseminated, includes for example information about the project objectives, the different phases of project execution (construction, operation & maintenance, decommissioning), Scoping documents and draft ESIA report. Technical information disclosure is available for all stakeholder groups and is communicated in ways that can be accessed and understood by all stakeholders (e.g., provided in local dialects, written in a style suitable to different education levels, verbally for illiterate people).
- Communication Tools:** they are used for broader outreach and to convey specific key messages, functioning at once as information platforms and channels to communicate with the community. Tools include website, social media (e.g. a Facebook page), newspapers, radio, community notice boards, posters / banners / flyers, etc.

During the EIA study, due to ongoing Covid-19 restrictions, the EIA and ESIA team were not able to organize physical meetings for technical information disclosure with stakeholders. Instead, technical project information was shared with stakeholders via an informational video conference/webinar that was published online afterwards, and through which stakeholders were informed about the Project (taking place in the scoping phase of the EIA study).



Stakeholders must of course be *notified* of the ability to participate in consultation meetings. Involvement can be achieved through a variety of means, including the Communication Tools listed above (social media, local press / newspapers, radio, community notice boards, posters / banners). In addition, written invitations can be sent to key stakeholders, by traditional or electronic mail.

To prioritize and focus the management of the stakeholder engagement process the Stakeholder Engagement Matrix provided in the Table below is used. In this matrix, for each stakeholder, information about their relationship with the project is registered, tracked and analyzed.

The purpose of the columns numbered 1 to 5, can be explained as follows:

- (1) Expectations from the project: The main expectations of different stakeholder groups should be registered. This allows for:
 - initiating conversations vis-à-vis expectations that are not realistic, or beyond the objectives of the project; and
 - keeping a central focus on Project progress vis-à-vis justified expectations. Both are crucial components of understanding or analyzing (changes to) the level of acceptance of the Project on part of different stakeholders.
- (2) Concerns vis-à-vis the project: Registration of concerns is central towards managing the corresponding E&S issues and/or organizing (additional) stakeholder meetings to clarify and possibly take away some of people’s concerns. As above, registration of concerns is also crucial for understanding or analyzing (changes to) the level of acceptance of the Project on part of different stakeholders;
- (3) Level of interest: Allows analyzing (changes in) the level of interest in the Project by different stakeholder groups throughout the Project cycle;
- (4) Level of acceptance: Allows analyzing (changes in) the level of acceptance of the Project by different stakeholder groups throughout the Project cycle, and to align engagement activities with this indicator; and
- (5) Level of power: Allows analyzing (changes in) the level of influence of the Project by different stakeholder groups throughout the Project cycle, and to align engagement activities with this indicator.

Table 7-2: Proposed Stakeholder matrix template

Stakeholder	Stakeholder group	(1) Expectations from the project	(2) Concerns vis-à-vis the project	(3) Level of interest <i>High-medium-low</i>	(4) Level of acceptance <i>High-medium-low</i>	(5) Level of power <i>High-medium-low</i>

Considering that the level of acceptance and level of influence of different stakeholders may change throughout the project, the prioritization and management of stakeholder engagement is a dynamic process. It is recommended to monitor these indicators for the previously identified as well as new stakeholders. Therefore, the matrix will be regularly checked, updated, and revised when necessary.

7.5 Stakeholder Engagement Phases

International standards emphasize that public participation is important throughout the Project cycle and the ESIA process, thus it should also be an ongoing process as opposed to the one-off event. Stakeholder engagement should be built into an operation’s planning at the very outset of the project and at subsequent key decision-making points. The different engagement phases can be distinguished, which correspond to different phases of the Project and of the ESIA that is conducted for the project.

The Stakeholder Engagement process for Project One considers the following phases, according to the phases of the project design and its ESIA process:

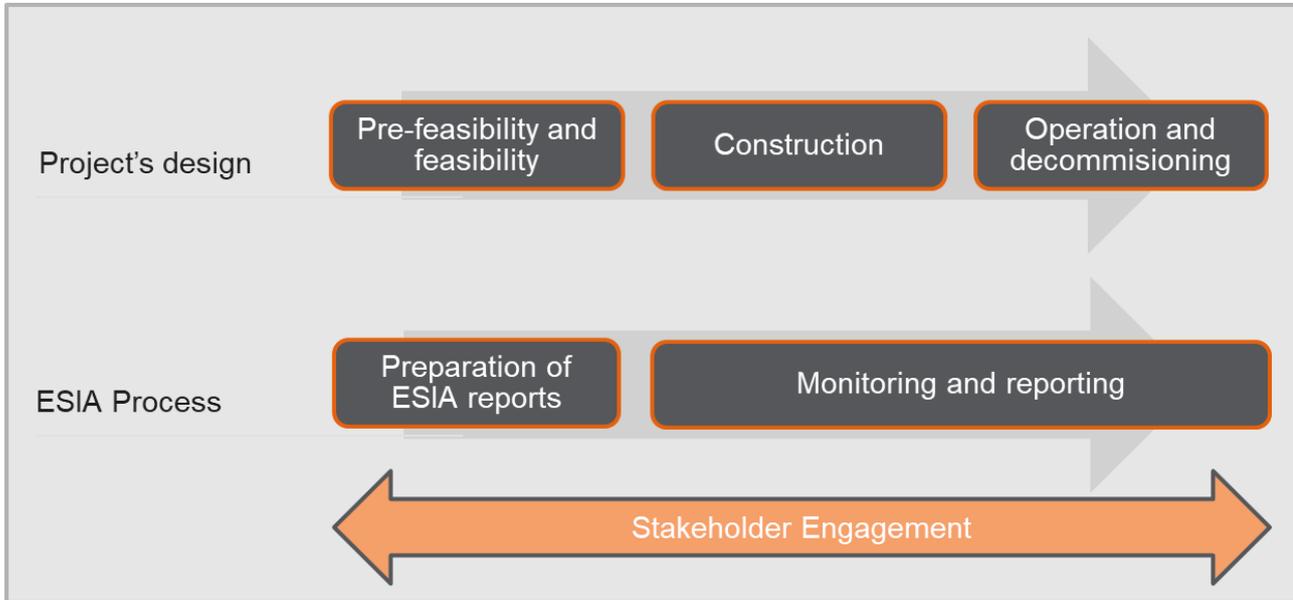


Figure 7-1: The three general phases of the Project and Stakeholder Engagement

7.5.1 Preparation phase

During the Preparation Phase, while the project design is in Pre-feasibility and Feasibility stages, the E&S tasks are associated to the preparation of the EIA/ESIA reports. At this stage, the engagement of stakeholders has two focuses:

- Disclose information about the project (type of projects, its parts and activities, as well as its schedule and the investment involved); and
- The EIA/ESIA process, that is, legal procedure in Belgium and the documents prepared to comply with the request of international financiers.

Figure 7-2 shows the phases of the SEP during the project planning phase.

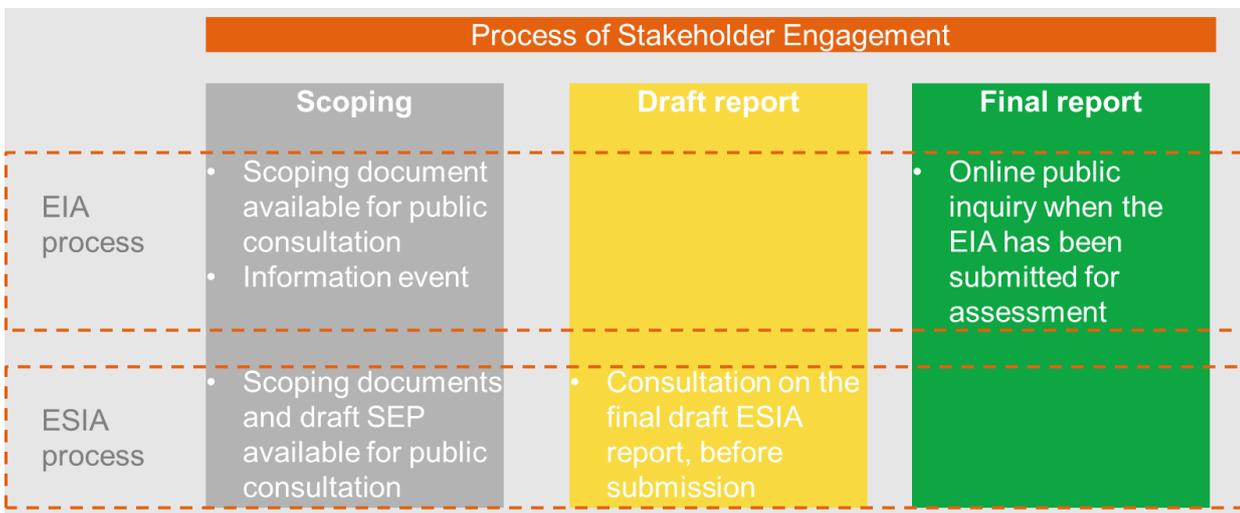


Figure 7-2: SEP process during the Project cycle

7.5.1.1 Scoping

In the scoping phase of an EIA/ ESIA, the scope and level of depth of the environmental and social issues to be addressed in the impact assessment are determined. Scoping involves gathering primary information with an emphasis on listening to issues of greatest concern to stakeholders.

7.5.1.2 ESIA report

This phase is focused on determining the baseline situation of the environmental and social aspects that had been 'scoped in' during the ESIA Scoping phase: i.e., what were the social and environmental conditions and dynamics? Once the baseline situation has been established, the potential risks and impacts of the project can be assessed. The outcome of this process is a classification of environmental and social impacts based on impact magnitude and severity. According to international standards, this information, together with the Environmental and Social Management Plan which contains the proposed mitigation measures to address the assessed impacts, is presented to the stakeholders, in order to receive stakeholder feedback on the completeness of the assessment and suitability/appropriateness of the proposed measures. However, as indicated in paragraph 6.3.2 for this project, the Flemish EIA procedure and corresponding public consultation requirements are followed. This means that the EIA Report is not disclosed prior to submission to the responsible authorities that advise and decide on the environmental permit. Consultation in this stage will be limited to digital disclosure of the EIA Report during the permit application review and approval process that is organized by the authorities.

7.5.2 Construction, Operation and Decommissioning Phases

Engagement should begin early, be proactive and continuous—not only during the EIA/ESIA process, but also throughout the whole project lifecycle from planning to decommissioning. Thus, once the ESIA is finalized and all required permits are in place to start the construction works, stakeholder engagement activities will continue. Engagement will focus on those issues that are of most relevance or concern for the specific group in question.

During the Operation & Maintenance Phase, stakeholders will be able to register questions, request information, or express concerns through a Communication and Grievance Mechanism. This way, continuity of the established relationships is safeguarded.

Thus, this Plan should be updated and developed in detail before the construction phase begins. The update of the SEP for the construction and operation phases of the Project will be presented to the stakeholders in the meeting where the draft ESIA will be disclosed. If appropriate, stakeholders should participate in the monitoring of the ESMP. Thus, it should be discussed if and how stakeholders will participate in the monitoring tasks and how the information of the monitoring will be disclosed. Suggestions for how to accommodate this requirement in the context of Project One, are provided in paragraph 8.9.

7.6 Roles and Responsibilities

For the effective implementation and management of the SEP, the international standards recommend establishing a dedicated and trained team. The responsibility for implementation of stakeholder engagement is part of the roles and responsibilities assigned to the Environmental and Social Management System (ESMS) team.

This is presented detailed in the ESMS Report.

7.7 Monitoring and Reporting

International standards require to monitor and report on the implementation of the stakeholder engagement plan, as well as involvement of stakeholders in the monitoring of the project's E&S performance. For Project One, monitoring and reporting on the SEP will be implemented through:

1. **Tools for recording activities with the stakeholders.** The usefulness of the recording tools lies in the possibility of having traceability of the activities carried out with all stakeholders, information such as who attends, and which topics were discussed. Tools for recording Project One's activities include:

a. **Minutes:** These are written records of the activities carried out, serve to support the agreements, make clear the responsibilities of each participant in a meeting and/or activity, and have information on how it has been carried out and has evolved the relationship with the different actors.

It is important to consider that they should always be available to those who participated in the activity.

b. **List of attendees:** It is essential to verify who attended the activities. Therefore, at the end of each activity, participants should be asked to register his/her name and contact information in this list. This type of record-keeping is relevant mostly for future reference, whenever engagement activities are organized in the operation phase (and possible demobilization phase) of the project. Due to the necessary adjustment of the stakeholder engagement process in the light of the Covid-19 restrictions, and alignment of the public consultation process with Flemish requirements, input from stakeholders has been recorded in anonymized form. The same does not apply to the advice submitted by governmental bodies on the EIA scope, which is documented with the name of the respective organizations.

In **Appendix 1 and 2** there are proposed formats for registration of the participation activities. Appendix 1 is the list of attendees and Appendix 2 is a Minute.

On some occasions, it will be necessary to explain to the attendees that signing the minutes and the list of attendees does not necessarily mean ratifying an agreement on a consultation process, but it only will serve for the traceability and systematizing the relationship with stakeholders.

2. **Tools for reporting activities and the management of the SEP:** In a periodicity that will be agreed upon later on in the process (monthly or quarterly), information about the activities carried out in the context of the SEP will be systematized and reported to the Project Manager and the professional that IOB appoints for monitoring stakeholder engagement of this project. This monitoring will be developed in such a way that this information can be analyzed and, thus, gives feedback to the stakeholder management.

The report will be in a check-list format and include, at least, the following information:

- Stakeholder Engagement Plan → Number and type of disclosure materials used;
- Social → Number and type of enquiries managed through the Communication and Grievance Mechanism, with a brief description (details in section 8.7); number and type of activities carried out with stakeholders, attaching the recordings;
- Environmental → Monitoring of the ESIA;
- Labour → H&S performance and number of audits for subcontractors and suppliers, and the outcomes.

3. **Tools for public disclosure:** In terms of reporting, the international standards require the promoter to establish regular communication and reporting channels back to the communities and individuals impacted and concerned. Project-related information can be integrated into the corporate sustainability reporting practice.

For example, the GRI Sustainability Reporting Standards offer a framework in which the project impacts can be disclosed in the context of the corporate-level disclosures. Thus, some of the consideration that will be taken into account are:

- GRI 102: General Disclosures standard, including Stakeholder Engagement disclosures;
- GRI 413: Local Communities standard, which refers to the operations with the implemented local community engagement and impact assessments,
- other relevant topic-specific environmental (GRI 300 series standards), social (GRI 400 series standards) and economic (GRI 200 series standards) disclosures.

8 Stakeholder Engagement Implementation

This chapter provides an overview of the activities undertaken to implement the stakeholder engagement framework described in the previous chapters. The tables in the following paragraphs describe how the stakeholder engagement activities for Project One comply with the applicable standards, showing:

- The requirements from the IFC for stakeholder engagement; and
- The activities performed and/or plan in order to comply with these requirements.

8.1 Stakeholder analysis

IFC Requirements	Project One's activities
<ul style="list-style-type: none"> • All project's stakeholders have been properly identified (IFC, PS1); • The client identified individuals and groups that may be directly and differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status (IFC, PS1); • IFC, PS1, paragraph 26: 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; and • IFC, PS1, paragraph 27: When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents. 	<ul style="list-style-type: none"> • In April 2019, a Stakeholder Management Plan covering the Pre-FEED, FEED and EPC phases of the Project was developed. This was the result of a collective exercise undertaken with Project One Integrated Program Management Team (IPMT) held in March 2019, where sixty-three stakeholders were identified. Since then, the list has been regularly updated and new stakeholders are being identified; and • In September 2020, a Stakeholder Mapping exercise has been performed to categorize stakeholders and prioritize them according to the influence-interest stakeholder analysis method.

8.2 Disclosure of the project

IFC Requirements	Project One activities
<ul style="list-style-type: none"> • The client provided Affected Communities with access to relevant information. The information is disclosed in culturally appropriate manner (IFC, PS1); • Affected Communities have access to information on the project, related risks and impacts, relevant mitigation measures. (IFC, PS1); • The client will 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. (IFC, PS1 paragraph 29); 	<ul style="list-style-type: none"> • In January 2019 INEOS Olefins Belgium made a press release and held a press conference; • INEOS Olefins Belgium has had several meetings with stakeholders in 2019, which have continued in 2020. They are a member of the 'Adviesraad', or neighborhood council chemistry: an advisory board for chemical companies in the Antwerp polder which includes both companies and citizens. A meeting with 'Adviesraad' took place on the 24th of September 2019. Stakeholders from Evonik, Bayer, Inovyn and Oiltanking were present during the meeting, as well as representatives from INEOS Olefins Belgium. During the meeting Project One was introduced and described, concerns regarding the project were discussed and addressed, such as issues related to noise nuisance and traffic. INEOS Olefins Belgium also



IFC Requirements	Project One activities
<ul style="list-style-type: none"> When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents (IFC, PS1, paragraph 27); and The client will tailor its consultation process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups (IFC, PS1). <p>See also 8.3 and 8.4</p>	<p>indicated that a website containing information regarding Project One and its progress would be made available to the public.</p> <ul style="list-style-type: none"> Additional contacts exist with mayor and communications advisors of local communities in Berendrecht-Zandvliet-Lillo. They will communicate with local residents through their local channels. The project website has been made public and is available in Dutch (https://project-one.ineos.com/nl/) and English (https://project-one.ineos.com/en/) languages. The website serves as one of the key tools in informing stakeholders. On the website people can also register for a dedicated newsletter; INEOS Group is active on social media (Facebook, Youtube: INEOS Group, Twitter: https://twitter.com/INEOS) and has dedicated channels for its activities in Belgium (account: INEOS Belgium); INEOS Olefins Belgium is in permanent contact with authorities, politicians, activist groups, journalists, industrial neighbors; and Media relations initiatives include press releases, exclusive interviews (i.e. De Tijd, De Standaard), background briefings, respond to incoming media queries regarding Project ONE Disclosure of the ESIA and ESMP documents will be done based on the requirements of the ECAs.

8.3 Information gathering

To determine the baseline situation in the Project’s Area of Influence (also referred to as reference situation), different methods of data collection have been applied. Where primary research methods such as interviews are used, such information gathering moments are at the same time key moments of engagement. Thereby it is important to clarify that, while engagement is not the primary objective of these encounters, in a way these moments of information gathering do function as platforms of interaction and communication that contribute towards the objectives of stakeholder engagement for the project.

IFC Requirements	Project One activities
<ul style="list-style-type: none"> There is a process to identify and assess the possible environmental and social risks and impacts, including the issues raised in PS 2 to PS 8³. Where applicable, it considers the life cycle of the project (IFC, PS 1). The risks and impacts identification process takes into account differing values attached to biodiversity 	<ul style="list-style-type: none"> Information gathering for EIA (m.e.r.) aspects is done by desk study as well as actively looking at input given during interviews and the public consultation in the context of the scoping document; and Information gathering for ESIA is done by desk study.

³ PS 2: Labor and Working Conditions; PS 3: Resource Efficiency and Pollution Prevention; PS 4: Community Health, Safety, and Security; PS 5 5: Land Acquisition and Involuntary Resettlement; PS6: 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; PS7: Indigenous Peoples; PS8: Cultural Heritage.

IFC Requirements	Project One activities
<p>and ecosystem services by stakeholders (IFC, PS 6).</p> <ul style="list-style-type: none"> • The potential risks and impacts of the project on cultural heritage have been identified and assessed. Relevant stakeholders were consulted (IFC, PS 8). • Occupation Health and Safety risks and potential impacts are identified, also for third party and primary supply chain workers (IFC, PS2). • Risks and impacts for community health and safety are assessed for all project's phases (IFC, PS4). • The consultation process should (i) capture both men's and women's views, if necessary through separate forums or engagements, and (ii) reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate. (FC PS1, paragraph 31 on ICP⁴). 	

8.4 Scoping phase public consultation

IFC Requirements	Project One's activities
<ul style="list-style-type: none"> • The client will 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. (IFC, PS1 paragraph 29); • 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 (IFC, PS1, paragraph 30); • The client will tailor its consultation process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups (IFC PS1); • Stakeholder engagement was planned for and carried out in line with the principles of prior, informed and free engagement, and informed participation (IFC, PS1); and 	<ul style="list-style-type: none"> • EIA scoping document was disclosed on EIA dossier database (https://omgeving.vlaanderen.be/mer-dossierdatabank). • INEOS Olefins Belgium has completed a voluntary public consultation/participation in the EIA scoping process. This process started in 2020 and the initial plan was to organize an information market in April 2020 (in the harbor); however, due to the Covid-19 restrictions a face-to-face meeting was no longer possible within the timeframe related to the disclosure of the scoping document. As the formal procedures of Departement Omgeving only allow for comments related to the proposed EIA scope and project alternatives or methodology, the idea was that this information meeting would give floor for other comments as well (perspectives on the project in general). • INEOS Olefins Belgium was in the lead for organizing the information meeting. The announcement of the information meeting would have been on the notification, or registration of request for scoping advise (the scoping document). However, due to the Covid-19 restrictions, eventually information videos (a short version with a concise overview, and a long

⁴ ICP stands for Informed Consultation Process, which is required for projects with potentially significant adverse impacts on Affected Communities. ICP involves a more in-depth exchange of views and information, and an organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

- Stakeholders have participated in the process of Impact Assessment (screening, scoping and preparing ESIA phases). The process was initiated early in the process, continued through the life cycle of the project, was inclusive, adequately documented (IFC, PS1).
- version with explanations for each EIA discipline) were made and published on the dedicated INEOS website (<https://info.project-one.eu/participatie-mer>). The initiative was announced in the local newspapers and on the websites of the Port of Antwerp and social media of INEOS Belgium.
- During the preparation of the draft EIA, the scope of the project was reduced. No additional public voluntary consultation moment was organized following this scope reduction Prior to submission of the EIA.

8.5 EIA full report public consultation

IFC Requirements	Project One's activities
<ul style="list-style-type: none"> 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 (IFC, PS1, paragraph 30); The client will tailor its consultation process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups (IFC PS1); All project's stakeholders have been properly identified and consulted about the different aspects of the project. (IFC, PS1); Stakeholder engagement was planned for and carried out in line with the principles of prior, informed and free engagement, and informed participation. (IFC, PS1); Stakeholders have participated in the process of Impact Assessment (screening, scoping and preparing ESIA phases). The process was initiated early in the process, continued through the life cycle of the project, was inclusive, adequately documented. (IFC, PS1); IFC, PS1, paragraph 33: Where stakeholder engagement is the responsibility of the host government, the client will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with the objectives of this Performance Standard; and IFC, PS1, paragraph 33: If the process conducted by the government does not meet the relevant requirements of this Performance Standard, the 	<ul style="list-style-type: none"> As indicated above, stakeholders have had the opportunity to provide their input on the proposed scope of the EIA study through the public consultation process organized by Team-MER. The Team-MER scoping advice took into account, among other things, the input from stakeholders. The Flemish procedure does not require stakeholders to be consulted prior to submitting the final EIA Report to the authorities so that they can express their views on project risks, impacts and mitigation measures. Instead, public participation is organized during the evaluation and decision-making period of the permit application (as part of the 'openbaar onderzoek'). The EIA Report is then publicly accessible to all stakeholders, who are able to appeal/object to the Project either online or by post, whereby they can make reference to the EIA Report. The submitted standpoints, comments and objections raised during this process, are considered in the advice and decision-making process of the responsible authorities. An online public information session was held on the 2nd of September 2021 following the submission of the environmental permit request on 20 July 2021. Members of the Advisory Board (Adviesraad), which includes members of the local municipalities in Berendrecht, Lillo and Stabroek, were invited to the session. The session was also announced on the websites of the City of Antwerp and Project One. It was reported that 66 participants attended the session, during which a presentation was given about the project and the EIA process (the scope of the project, a summary of the EIA report, environmental safety report and mitigating measures) and participants were invited to ask questions during the Q&A. Additionally, participants were invited to ask questions in the five calendar days following the session. In addition, the Adviesraad (Advisory Board (which includes members of the local municipalities in Berendrecht, Lillo and Stabroek) and the mayor of the

client will conduct a complementary process and, where appropriate, identify supplemental actions.

local district of Berendrecht-Stabroek-Lillo have been contacted in order to organize a meeting to present information regarding Project One and to address any questions the attendees may have. Specific ESIA topics, in addition to EIA topics, will be included in this consultation process.

8.6 Addressing stakeholder comments on EIA report

IFC Requirements

- When Affected Communities are subject to 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 (IFC, PS1, paragraph 30);
- Stakeholders have participated in the process of Impact Assessment (screening, scoping and preparing ESIA phases). The process was initiated early, continued through the life cycle of the project, was inclusive and adequately documented (IFC, PS1);
- IFC PS1, paragraph 31 on Informed Consultation and Participation (ICP): leading to the client's incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing development benefits and opportunities, and implementation issues;
- The risks and impacts identification (and if relevant, the identified mitigation and performance measures and established actions) will take account of the outcome of the engagement process with Affected Communities as appropriate (IFC PS1, paragraph 11 and 15); and
- The client will document the process⁵, in particular the measures taken to avoid or minimize risks to and adverse impacts on the Affected Communities and will inform those affected about how their concerns have been considered (IFC PS1, paragraph 31).

EIA activities & IOB's activities

- Upon initiation of the permit application procedure, it is first determined whether the EIA Report is 'complete and admissible'. The draft EIA is a necessary annex to the permit application file but is not checked on its content yet in this phase.
- If the permit application file is deemed complete and admissible, public consultation of the permit application file, including the EIA must start within 10 days from the moment of declaring the file admissible. During a consultation period of 30 days, the permit application file and the EIA Report are then accessible for all interested stakeholders (both interested and affected parties), who can use the EIA Report to substantiate the standpoints, comments and objections they wish to express in reaction to the Project and the permit application for the Project. This stakeholder input is taken into consideration in the final advice from the authorities on whether or not to approve the EIA and to grant the permit.
- In this process, advice is also requested from other authorities (such as harbor-authorities, local governments in Flanders and in the Netherlands) on:
 - The EIA, whether it is a sound research report, and the permit application of which the EIA is part.
 - A next step in the permitting procedure is the approval of the draft EIA by the competent authority (Team EIA), taking into account all comments, objections and advices. If approved, the draft EIA Report automatically becomes the final version.
 - The permit can only be granted if the EIA has indeed been approved, which has happened on 3 November 2021.

⁵ The process of ICP, Informed Consultation and Participation, which is required for projects with potentially significant adverse impacts on Affected Communities.

8.7 Grievance Mechanism

IFC Requirements	Project One's activities
<ul style="list-style-type: none"> • IFC, PS1, paragraph 34: 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; • The grievance mechanism should be scaled to the risks and adverse impacts of the project and have Affected Communities as its primary user. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies (IFC, PS1, paragraph 35); • The client will inform the Affected Communities about the mechanism in the course of the stakeholder engagement process (IFC, PS1, paragraph 35); • A Communication and Grievance Mechanism has been implemented, which operates efficiently and effectively for those affected (IFC, PS5); • There is a grievance/communication mechanism for workers (own and third parties) (IFC, PS2); • A grievance mechanism has been implemented to receive and facilitate the resolution of concerns regarding the environmental and social performance of the project(s) (IFC, PS1); and • The GM addresses concerns using an understandable and transparent process that is culturally appropriate and readily accessible to all stakeholders, at no cost and without retribution (IFC, PS1). 	<ul style="list-style-type: none"> • INEOS Group has the INEOS Speak Up! accessible to its employees (not third parties), which is an independent grievance mechanism. • Workers of key-contractors during the construction phase will have access to the grievance mechanism provided by their employers. • The project website has the option for stakeholders to leave comments. The website will also include a contact form which visitors of the site can use for questions. • A Communication and Grievance Mechanism (GM) has been designed and will be implemented specifically for Project ONE and aiming for all stakeholders (both affected communities and workers of third-parties that are not key contractors).

8.8 Monitoring

IFC Requirements	Project One's activities
<ul style="list-style-type: none"> • Where relevant, Stakeholders are involved in monitoring (IFC, PS1); • Procedures (documents) are available to monitor the effectiveness of the ESMP and report the performance (IFC, PS1); 	<p>INEOS Olefins Belgium will appoint a specialist, within the ESMS team, for monitoring the stakeholder engagement of the project. Main tasks of the specialist will be to have updated:</p> <ul style="list-style-type: none"> • Overview of all stakeholder engagement activities conducted in relation to Project ONE including details on

- The scope of application could include aspects through the entire life cycle of the project (IFC, PS1).

- date, purpose, internal and external participants (name and, if applicable, organization) and outcomes;
- Archive with all disclosure materials (letters, press releases, reports, leaflets) shared with stakeholders regarding Project ONE;
- Archive with all communications and interactions (e-mails, brief notes of phone calls) with stakeholders regarding Project ONE;
- Archive of all interactions through the Grievance Mechanism (GM); and
- Archive of all received comments through the website.

It is recommended that monitoring of stakeholder engagement will be done at fixed moments in time (preliminary a 3-month period is proposed) and includes:

- A check on whether all planned stakeholder engagement activities have been indeed conducted;
- Number and type of disclosure material used;
- An evaluation of all interactions with stakeholders and received input (via the GM, the website and parallel to this);
- Formulation of measures based on the evaluation which aim for adjusting the stakeholder engagement process in a way that 1) project risks are reduced and 2) International Standards are met. Every next monitoring period, the progress on these measures will be measured, and when needed new actions will be identified.
- Outcomes of the SEP monitoring could be done jointly with the project reporting (see 8.9).

In addition to monitoring the implementation of the stakeholder engagement process of the project, international standards require involvement of stakeholders in the monitoring of the project's E&S performance. While recognizing that the type of monitoring that is required for the project is of a highly technical nature and as such needs to be executed by subject matter experts, it is nonetheless good and valuable practice to keep stakeholders informed about E&S monitoring.

Considering that monitoring is the responsibility of the local government, and monitoring plans are defined after the permit procedures is closed (if the permit is granted), INEOS Olefins Belgium commits to being available to facilitate stakeholder involvement in the monitoring along the above lines, in case the government considers participation by stakeholders in monitoring desirable.

Thus, an overview of the monitoring process as well as periodic summary reports of monitoring results will be published on Project One's website, as this is part of the EIA procedure. The following monitoring information should be considered for inclusion:

- The type of monitoring activities that are carried out for the project;
- The frequency of monitoring;
- Roles and responsibilities (who carries out the monitoring, who oversees this, etc.);
- Monitoring indicators;
- Monitoring results;
- Explanation of what actions will be taken in case of deviations or non-compliances found during monitoring.

8.9 Reporting

IFC Requirements	Project One's activities
<ul style="list-style-type: none"> • Occupational Health and Safety is monitored and documented. Occupational accidents, diseases, and incidents are reported. (IFC, PS2); and • A report or periodic reports are delivered to the interested and affected stakeholders, describing the progress of the project, the risks to or impacts on the communities, the consultation process and the grievance mechanism. (IFC, PS1). 	<p>A newsletter will be distributed to stakeholders who are identified and have subscribed to it (on the website).</p> <p>In addition to the newsletter, a three-monthly report will be developed and shared with stakeholders during construction. The three-monthly report will be communicated through the newsletter and on the Project One website. The need to use additional communication channels will also be evaluated.</p> <p>The report will include:</p> <ul style="list-style-type: none"> • A summary and a description of the engagement activities executed in the period. • Communication and Grievance Mechanism: A summary of the number and type of enquires managed. • Environmental and social: a summary of the results of the monitoring on E&S aspects. • Labor and H&S: a summary of the results <p>Also, the newsletter will include an overview of the activities plans for the next period.</p> <p>Internal reporting on Occupational Health and Safety at the INEOS Group level is defined and performed in accordance with the INEOS Group Guidance Note (IGGN) 1: SHE Performance Reporting, Measures & Definitions.</p>

8.10 Construction, operations & maintenance, and decommissioning phase

IFC Requirements	Proposed ESIA's activities
<ul style="list-style-type: none"> • The client engages with stakeholders throughout all stages (IFC, PS5); • Risks and impacts for community health and safety are assessed for all project's phases (IFC, PS4); and • Stakeholder engagement during the construction phase will relate to all activities leading up to and during the physical construction of facilities, infrastructure or buildings (and the "temporary works" needed to complete construction, such as access roads), as well as the management of contractors and construction contracts (IFC Stakeholder Engagement Handbook). 	<p>In the course of the preparation phase, a stakeholder engagement plan for the construction, operations and maintenance, and decommission phases will be detailed, which will be based on the framework outlined above.</p> <p>This plan will include the continuation of the following activities mentioned before:</p> <ul style="list-style-type: none"> • Update of the stakeholder analysis (see 8.1); • Operation of the Communication and Grievance Mechanism (see 8.7); • Monitoring of stakeholder engagement (see 8.8); • Reporting on project process (newsletter) (see 8.9); and • Reporting on social, environmental and Health and Safety aspects related to the project (8.9). <p>Considerations that will be taken into account during the implementation of this plan:</p> <ul style="list-style-type: none"> • There will be records of all activities; • Additional to planned activities, key moments during the project process, such as milestones in planning and high-risk activities, are identified and recorded; • Organizational capacity, in order to comply with all the activities and task required, is ensured; <p>Sufficient budgetary resources are allocated to the implementation of the engagement plan; and</p> <ul style="list-style-type: none"> • The IFC Stakeholder Engagement Handbook will be consulted for further guidance.

ATTACHMENT 1: Proposed format for the list of attendees

	List of Attendees [name of the activity]: Project: Project ONE
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Nº	Name	Gender	Institution / Organization	Telephone	e-mail	Signature
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

Date:
 Duration:

Nº of Attendees
 Page Nº:

ATTACHMENT 2: Proposed format for the minute of engagement activities

Date:	
Venue:	
Main goals of the activity:	<ol style="list-style-type: none"> 1. 2. 3.
Total number of attendees, per category:	<ol style="list-style-type: none"> 1. 2. 3.
Description of attendees according to categories:	<ol style="list-style-type: none"> 1. 2. 3. 4. 5.

Main topics discussed:

Colophon

STAKEHOLDER ENGAGEMENT FRAMEWORK
ESIA LIGHT- PROJECT ONE
INEOS OLEFINS BELGIUM

AUTHOR

Milda Malinauskiene, Pauline de Regt, Nynke Shaap, Hanneke Mol

OUR REFERENCE

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DATE

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CHECKED BY

Sofía López Carrasco

RELEASED BY

Hans van Gossum

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www.arcadis.com

Arcadis Nederland B.V.

P.O. Box 220
3800 AE Amersfoort
The Netherlands

T +31 (0)88 4261261

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