



## **Stakeholder Engagement Plan and Grievance Mechanism**

Prepared for  
**Pengerang Energy Complex Sdn Bhd**

**25.02  
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## ABBREVIATIONS

CBO	Community Based Organization
CSO	Civil Society Organizations
CSR	Corporate Social Responsibility
ESAs	Environmentally Sensitive Areas
ESC	EnviroSolutions & Consulting
ESMS	Environment and Social Management System
FGD	Focus Group Discussion
FPIC	Free Prior Informed Consent
GM	Grievance Mechanism
GN	General Note
ICP	Informed Consultation and Participation
IFC	International Finance Corporation
JKKK	Jawatankuasa Kemajuan dan Keselamatan Kampung
KK	Ketua Kampung
kMtpd	Kilometric tonnes per day
Kopeja	Koperasi Pengerang Jaya Johor Berhad
Kojaya	Koperasi Jaya Teluk Ramunia
KPIs	Key Performance Indicators
MMtpa	Million metric tonnes per annum
NGO	Non-Government Organization
PDT	Pengerang Deepwater Terminal
PEC	Pengerang Energy Complex Sdn Bhd
PEIP	Pengerang Eco-Industrial Park
PICC	Pengerang Commercial Centre
PIDP	Pengerang Integrated Development Project
PIP	Pengerang Industrial Park
PIPC	Pengerang Integrated Petroleum Complex
PS	Performance Standards
SEP	Stakeholder Engagement Plan
ULCCs	Ultra Large Crude Carriers
UTM	Universiti Teknologi Malaysia
UTHM	University Tun Hussein Onn Malaysia
VLCCs	Very Large Crude Carriers
WWF	World Wide Fund for Nature



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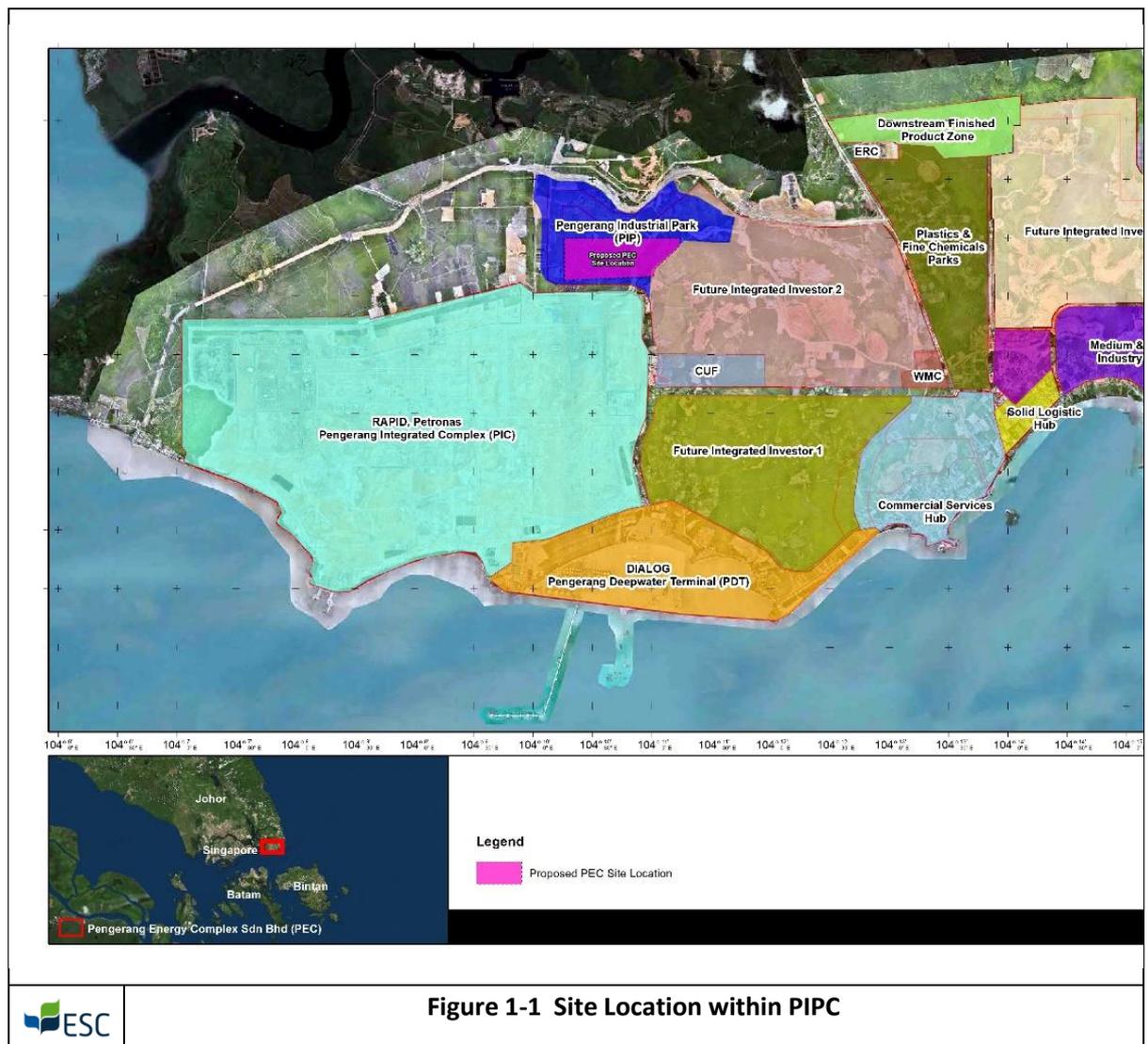
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## 1 Introduction

### 1.1 Project Background

The proposed Pengerang Energy Complex Sdn Bhd (PEC) is planned as a world-scale condensate splitter and aromatics complex, on a 250-acre site in the Pengerang Industrial Park (PIP) that is located within the Pengerang Integrated Petroleum Complex (PIPC), Pengerang, Kota Tinggi District, Johor (refer to Figure 1-1). The production capacity of the PEC is about 5.844 Million metric tonnes per annum (MMtpa), or 16.7 kilometric tonnes per day (kMtpd), of aromatic petrochemicals and oil products, which will be processed from 6.324 MMtpa of condensate feedstock using the latest generation of proven UOP technology.



The PEC project is estimated to cost about RM13.0 billion (~US\$ 3.4 billion) and expected to spur economic activities. The PEC project is also in-line with the Johor State Government's development policy to develop Pengerang into a major oil & gas, and petrochemical hub for Malaysia. The

Pengerang Integrated Petroleum Complex (PIPC) is creating value to the downstream oil and gas value chain in Johor. Pengerang is considered a strategic location due to:

- Access to existing major international shipping lanes; Middle East –Singapore –China;
- Water depth of 24m enables Very Large Crude Carriers (VLCCs) and Ultra Large Crude Carriers (ULCCs) to berth right at the jetty;
- Safe and sheltered harbour;
- No breakwater required with sufficient seagoing passage for Very Large Crude Carriers (VLCCs) and Ultra Large Crude Carriers (ULCCs);
- Low negative socio-economic impact;
- Availability of sufficient development land;
- A single candidate plot in excess of 20,000 acres;
- Very few Environmentally Sensitive Areas (ESAs) which are easily preserved; and
- Proximity to an existing major trading hub adjacent to Singapore.

## 1.2 Objective

The purpose of this Stakeholder Engagement Plan (SEP) is to provide guidance, strategy and approach for the stakeholders' engagement for PEC in accordance with national regulations and International Finance Corporation (IFC) Performance Standards (PS). The IFC PS sees stakeholder engagement as an important aspect to the successes of project. IFC states the objective of Stakeholder Engagement is as follows:

*“Stakeholder engagement is the basis for building strong, constructive, and responsive relationship that are essential for the successful management of a project’s environmental and social impacts “. (IFC PS 1, Para 25)*

and

*“The purpose of stakeholder engagement is to establish and maintain a constructive relationship with a variety of external stakeholders over the life of the project and is an integral part of an efficient and adaptive ESMS.” (Guidance Note (GN) 6 of IFC PS 1)*

This SEP is developed to comply with national regulations and IFC PS and set as a living document that is solely used for external engagement and will be updated according to project phases. A part of SEP, this document also provides detail of Grievance Mechanism.

## 1.3 Structure of Stakeholder Engagement Plan

This SEP structure follows the details of the IFC publication, ‘Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets’. The key sections recommended by IFC are shown in Table 1-1.

**Table 1-1 Structure of the Stakeholder Engagement Plan**

Chapter	Description
<b>1.Introduction</b>	Presents a summary of the Project
<b>2.Regulatory Engagement Requirements</b>	Describes the requirements for stakeholder engagement from a regulatory and contextual approach with specific regard to company obligations, national legislation and international standards
<b>3.Summary of Past Stakeholder Engagement Activities</b>	Provides an overview of PEC’s stakeholder engagement activities conducted to date
<b>4.Project Stakeholder</b>	Details the stakeholder identification process and the design of the stakeholder database
<b>5.Stakeholder Engagement Plan</b>	Establishes a broad engagement approach including activities and action plans
<b>6.Timetable</b>	Schedule for implementation
<b>7.Resource and Responsibilities</b>	Details management responsibilities for direct stakeholder engagement activities
<b>8.Grievance Mechanism</b>	Presents a step by step guide to manage grievances
<b>9.Monitoring and Reporting</b>	Provides a feedback and evaluation mechanism to ensure stakeholder feedback is captured and fed into the evaluation of engagement activities

## 2 Regulatory Requirement and Policies

Stakeholder engagement is a prerequisite prior to any project or activities with significant environmental and social impacts can commence. Proactive engagement with stakeholders is considered to be international best-practice to build strong relationship and ensure that those who are most impacted by, or with an interest in a particular project is freely consulted and informed, as well as to anticipate any potential issues, and generate problem solving responses.

Identifying and engaging with stakeholders on a range of environmental, economic and social issues that may arise as a result of any project activity can create added value to the project from a collaborative approach to problem solving.

This section highlights relevant national legal requirements, international guidelines and PEC corporate requirements regarding stakeholder engagement.

## 2.1 National Requirements

Stakeholder engagement and grievance mechanisms are not explicitly regulated in any law in Malaysia. However, consultation with council for Environmental Impact Assessment (EIA) in the Malaysian Environmental Quality Act 1974 is briefly mentioned under Section 34 A. And a recently published manual on social impact assessment for development project by the Ministry of Housing and Local Government provides a guideline for public involvement and public consultation in preparing social impact assessment through adopting Free Prior Informed Consent (FPIC).

Regarding the grievance mechanism, Mohd Adi et. al (2012) also confirm that there is no law, regulation or even directives being issued by the Malaysian authority in the form of guidelines, code of conduct or alike in implementing a grievance system.

## 2.2 International Requirements

This SEP is developed based on the framework used international best practice for public consultation and stakeholder engagement as outlined in '*Stakeholder Engagement: A Good Practice Handbook for Doing Business in Emerging Markets.*' This document suggests that public consultation should be 'free' (free of external manipulation, interference or coercion, and intimidation), 'prior' (timely disclosure of information), and 'informed' (relevant, understandable and accessible information. The consultation process should also be tailored to the language of the affected communities, their decision-making processes, and the needs of disadvantaged or vulnerable groups.

### 2.2.1 IFC Performance Standard

**IFC Performance Standard 1: '*Assessment and Management of Environmental and Social Risks and Impacts*'** requires stakeholder's engagement as a basis to build a strong, constructive, and responsive relationship that are essential in managing environmental and social impacts resulting from the Project. Effective engagement and consultation should be based on the prior disclosure of relevant and adequate information, including draft documents and plans, to all stakeholders. In general, stakeholder engagement includes stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and on-going reporting to affected communities.

**IFC Performance Standard 4 '*Community Health, Safety, and Security*'** outlines the project approach to avoid adverse impacts on community health and safety. Paragraph 12 requires the client to provide a grievance mechanism for affected communities to allow them to express concerns in relation to security arrangements and acts of security personnel as well as provide information about risks and impacts on communities resulting from the Project.

**IFC Performance Standard 5 '*Land Acquisition and Involuntary Resettlement*'** stipulates that those who are affected by land acquisition may experience social stress, hardship and improvement and should be fairly compensated and be the same or better off after land acquisition. This PS requires the project proponent to consider feasible alternative project designs to avoid or minimize physical and/or economic displacement. It is essential to have community engagement throughout the process

as well as to undertaken socio-economic census prior project start. (PS 5 will not be part of this SEP document, any Land Acquisition matter will be developed in a separate document).

**IFC Performance Standard 6 ‘Biodiversity Conservation and Sustainable Management of Living Natural Resources’** refers to earth ecosystems that provide resources that contributes to economic prosperity and human development. While biodiversity loss may result in serious reduction of resources and affect natural resource-based livelihoods, PS 6 aims to protect and conserve biodiversity; to maintain the benefits from ecosystem services; and to promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities.

**IFC Performance Standard 7: ‘Indigenous Peoples’** is associated with vulnerable groups impacted by project development. PS 7 is to ensure negative impact is minimized, respect is given to human rights, dignity and culture of indigenous people, and promote development benefits. PS 7 elaborates circumstances that trigger Free, Prior, and Informed Consent (FPIC), i.e. *Impacts on Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use; Relocation of Indigenous People from Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use; and Critical Cultural Heritage*. It is important to note that FPIC is essential for project development with consultation and participation of IPs.

**IFC Performance Standard 8 ‘Cultural Heritage’**. PS 8 aims to protect cultural heritage from adverse impacts of project activities and support its preservation; and to promote the equitable sharing benefits from the use of cultural heritage. It requires consultation with affected communities with regard to important cultural heritage.

Besides IFC PS, the IFC also issued **Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (IFC, 2007)**, which provides further details on guidance on stakeholder engagement and its integration with project cycle; and **Grievances for Companies Doing Business in Emerging Markets (IFC, 2009)**, which provides guidance in designing grievance mechanisms such as principles and process steps of good grievance mechanism.

### 2.3 Company Requirements

Currently, there is no company requirements and policies available for review.

### 2.4 Guidelines and Standards

A number of international guidelines and standards address grievance mechanisms, such as follows:

- IFC (2012) Performance Standards 1: Assessment and Management of Environmental and Social Risks and Impacts.
- IFC (2012) Performance Standard 5: Land Acquisition and Involuntary Resettlement.
- IFC (2012) Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.
- IFC (2012) Performance Standard 7: Indigenous Peoples
- IFC (2009) Good Practice Note - Addressing Grievances from Project-Affected Communities.
- IFC (2007) Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.

- IFC (2003) Addressing the Social Dimensions of Private Sector Growth Projects.
- IFC (1998) Doing Better Business through Effective Public Consultation and Disclosure: A Good Practice Manual.
- BSR (2012) Back to Basics: How to Make SHE Meaningful for Your Company

### 3 Summary of Past Stakeholder Engagements Activities

This section provides a summary of public consultations and disclosure activities that have been conducted by PEC.

#### 3.1 Public Consultation

To date, PEC has conducted several public consultations and engagement, including one on one interview, unstructured interview/dialogue, FGDs, and household survey. The public consultations are summarized in Table 3-1.

**Table 3-1 Past Public Consultation and Engagement**

Date of consultation	Theme	Participants (Number of Participants)	Information Disseminated
18 July 2018	Direct one-to-one interview	<ul style="list-style-type: none"> <li>Officer, Planning and Development Officer, PBT Pengerang, Bandar Penawar</li> <li>Manager, Project Planning, Bukit Pelali Properties Sdn Bhd</li> <li>Sales Manager, Cypress Potential Sdn Bhd, Sebana Cove</li> </ul>	Collect information for the project and Identification of issues and concerns raised by the stakeholders and evaluation of the significance of issues for purpose of developing EIA The focus is to decide whether the Project is likely to cause significant adverse impact resulting from construction and operation.
22 Sept 2018	Direct one-to-one interview	<ul style="list-style-type: none"> <li>Manager, Sebana Cove Resort</li> </ul>	
22 Sept 2018	Unstructured interview  Use of printed handouts of the Project	<ul style="list-style-type: none"> <li>Penghulu of Mukim Pengerang &amp; Pantai Timur</li> <li>Ex-village head of Kg Lepau</li> <li>Ex-village head of Kg Bukit Buloh</li> <li>Village head of Kg Bukit Raja, Kg Bukit Gelugor and Kg Bukit Pelali</li> <li>Chairman of Koperasi Pengerang Jaya Johor Berhad (KOPEJA)</li> <li>Representative from Koperasi Pengerang Jaya Johor Berhad (KOPEJA)</li> <li>Chairman of Koperasi Jaya Teluk Ramunia (KOJAYA)</li> <li>Representative from Koperasi Jaya Teluk Ramunia (KOJAYA)</li> </ul>	<ul style="list-style-type: none"> <li>Introduce the Project and for the stakeholders to raise and discuss matters that they consider to be relevant to the community.</li> <li>The setting up of the cooperatives was initiated by the Johor state government with collaboration from PETRONAS to serve as a platform for the resettled residents to be trained and to engage in business and the provision of services and goods to PIC</li> </ul>
27 Oct 2018	Focus Group Engagement (briefing using slide presentation, printed material and Q&A session)	<ul style="list-style-type: none"> <li>Residents of Kg Lepau (nearest receptors)</li> <li>Penghulu of Mukim Pengerang and Pantai Timur</li> <li>Former village head of Kg Lepau</li> <li>Former village head of Kg Bukit Buloh</li> <li>Village head of Kg Bukit Raja, Kg Bukit Gelugor and Kg Bukit Pelali</li> </ul>	<ul style="list-style-type: none"> <li>The engagement session served as a platform for information disclosure to the villagers, addressed stakeholder concerns as well as built community consensus over certain issues.</li> <li>Cross-check information with stakeholders including obtaining reactions to the proposed Project</li> </ul>

Date of consultation	Theme	Participants (Number of Participants)	Information Disseminated
		<ul style="list-style-type: none"> <li>Fishermen of Kg Lepau</li> </ul>	
28 Oct 2018	Meeting	<ul style="list-style-type: none"> <li>Johor Corporation</li> </ul>	Closed meeting on project development at Pengerang Industrial Park
9 January 2019	Direct one-to-one interview	<ul style="list-style-type: none"> <li>Owner, fish cage farm, Sg Santi</li> </ul>	Collect information on fish farming activities
13 <sup>th</sup> Sept to 9 <sup>th</sup> Oct 2018  8 <sup>th</sup> to 21 <sup>st</sup> January 2019	Household and Perception Survey (questionnaire survey)	<ul style="list-style-type: none"> <li>70 respondents randomly selected from the villages located inside the 5km zone of impact from the Project site. Villages include Kg Lepau, Kg Bukit Pelali, Kg Bukit Gelugor, Kg Bukit Raja and Kg Bukit Buloh.</li> <li>10 respondents randomly selected from Taman Rengit Jaya and 20 respondents (Malaysians from outside the Pengerang region, living and working in Pengerang) randomly selected from Kg Lepau.</li> </ul>	<ul style="list-style-type: none"> <li>The aim was to collect socio-economic data of the households as well as to obtain feedback and views of the residents on the proposed Project.</li> <li>The survey covered villages located within the 5k zone of impact from the Project site</li> </ul>

## 3.2 Dissemination of Information

Currently, information disclosure has been disclosed through public consultation as provided in Table 3-1. Other disclosure information is available on PEC's website, including company profile, PEC's projects, news, and contact details. Information on the website can be accessed through <https://www.pengerangenergy.com/pec.html>

## 4 Project Stakeholders

### 4.1 Stakeholders Identification

Stakeholder identification is a process which includes distinct steps of (i) identifying individuals, groups, local communities and other stakeholders that may be affected by the project, including those who are disadvantaged or vulnerable; (ii) identifying broader stakeholders who may be able to influence the outcome of the project (iii) identifying legitimate stakeholder representatives, and (iv) mapping the impact zones.

Referring to IFC definition of stakeholders, (external) stakeholders are defined as "persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively."

Considering the IFC definition, stakeholders are categorized into three groups:

- 1) *Directly Impacted Stakeholders*: People or entities that are directly affected by the Project and/or have been identified as most vulnerable to changes due to the Project. Direct stakeholders include impacted community, village heads, community and religious leaders, the sub-district head as well as villagers in the project affected communities, the district level and Johor state level authorities, and Federal level government office and vulnerable people, such as women, youth, elderly and minority ethnic groups.
- 2) *Indirectly Impacted Stakeholders*: People or entities who could be indirectly affected by the Project. Indirect stakeholders include Non-Governmental Organizations (NGOs) and Community Based Organizations (CBOs).
- 3) *Other Relevant Stakeholders*: People or entities who are interested in the Project or who can influence project operations, such as government agencies, other companies working in the area, media and academia.

A fourth category is internal stakeholders, which are not part of this Stakeholder Engagement Plan. These are employees of PEC, suppliers, contractors and subcontractors, distributors, clients, and investors. Engagement with these groups is regulated in company contracts. Any issues related to internal stakeholders are settled through contractual agreements. This SEP concerns external stakeholders only.

### 4.2 General Stakeholders

Ideally, identification, mapping, and determination of degree of influence and interest are obtained through a participatory approach with relevant management and staffs of PEC. Nevertheless, the

participatory approach is not available at the time of preparing this generic document. Secondary data from EIA report and other sources on the identified stakeholders as well as professional knowledge were used to identify, map, and analyze the stakeholders. Identification, mapping, and determination of degree of influence and interest will periodically be updated through participatory approach.

Based on the above mentioned definition and category of stakeholders, initial identified stakeholders can be classified as follows:

- Government – the authority that governs the state and provides services, regulation, development and empowerment. These authorities include federal, state, district, and village government;
- Business – including businesses that are directly or indirectly involved or interested in the Project which include private companies and stated-owned enterprises;
- Media – including international, national, and local printed mass media, online media, radio, television, etc.;
- Civil Society Organizations (CSO) - including NGOs (international, national, state, regional and local) and other groups or associations that are non-market and non-state organizations outside of family and share a common interest in the public sphere, such as village associations, environmental groups, women’s rights groups, farmers’ associations, faith-based organizations, labor unions, co-operatives, professional associations, chambers of commerce, independent research institutes and the not-for-profit media;
- Communities – including directly affected communities who live in project near geographical proximity and subject to potential Project impact or adverse risk on their physical environment, health or livelihoods (for example due to land acquisition, sharing on a common interest such as water user associations, fishers, herders, grazers), and cultural and historical heritage. Other group is indirectly affected communities which is a group of community who has an interest in and influence to the project.
- Academics – including national or regional public universities which conduct research and/or focus attention on local issues; and
- Vulnerable groups – women, children, youth, elderly, disabled, single parent, poor household, and minority ethnic groups. Vulnerability may be related to an individual or group and be based on their race, color, sex, language, religion, political or other opinion, national or social origin, birth, or other status. Other factors that can influence vulnerability are gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.
- Indigenous people – social groups with identities that are distinct from mainstream society which are often among the most marginalized and vulnerable segments of the population.

### 4.3 Engagement Approach with Women and Other Vulnerable Groups

The need to respect differences is paramount to the stakeholder engagement process. Vulnerable (groups of) people are those who experience higher risks of impoverishment and social exclusion compared to the general population. Separate consultation with women and vulnerable groups is held to accommodate the special needs of those groups and to voice their questions, concerns, opinions,

and suggestions that would be otherwise unheard. These stakeholder groups have each their own characteristics that make them vulnerable:

- **Women** – in patriarchal societies, women can readily be overlooked or excluded in the stakeholder engagement process. Hence, specific provision must be made for women, which may require separate stakeholder sessions for women, and provisions made to ensure women are not persecuted or placed under any duress for exercising their rights and freedom to attend ‘female only’ stakeholder consultation sessions and female engagement program events.
- **Minorities** – the stakeholder engagement process should specifically identify minorities based on religious, cultural, ethnic or other grounds, and seek to ensure that provision is made for their equal access to the stakeholder engagement process.
- **Elderly** – the elderly are particularly vulnerable, and are easily left out or exempted from stakeholder engagement activities. Addressing their rights to express concerns, views and cultural knowledge should be provided for.
- **Handicapped or illiterate** – the same applies as for elderly and minorities.
- **Disadvantaged isolated communities** – this group of people have little influence and power among other communities. Their rights, involvement and equal access to stakeholder engagement should be made available.
- **Indigenous Peoples** - social groups with identities that are distinct from mainstream society which are often among the most marginalized and vulnerable segments of the population. In many cases, their economic, social, and legal status limits their capacity to defend their rights to, and interests in, lands, natural and cultural resources, and may restrict their ability to participate in and benefit from development.

All these groups might be present on the proposed project location and consequently require due attention in the stakeholder engagement process. The consultation with these groups can be effective using participatory techniques, such as for example focus group discussions on specific topics.

#### 4.4 Stakeholder Mapping and Analysis

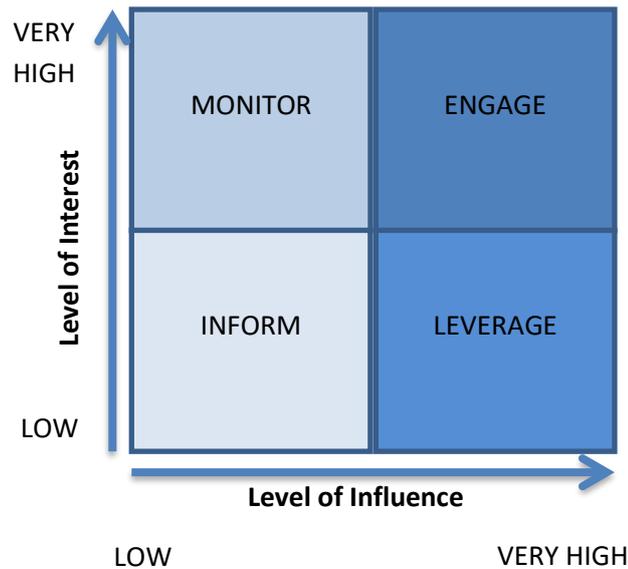
Stakeholder mapping and analysis are an important tool that are used to understand and determine stakeholders’ interest and influence on the project. In analyzing stakeholders, four quadrants of interest or influence grid is used to identify types of engagement for each stakeholder (**Figure 4-1**). Those types are as follows:

**Monitor** (High Interest, Low Influence): These stakeholders have a strong interest in PEC project but very little power to influence the Project. The Project needs to monitor and keep these stakeholders informed and their needs anticipated to gain their continued support.

**Inform** (Low Interest, Low Influence): These stakeholders are neither interested nor have much influence on the Project. They need to be informed about project progress. Positive information about the Project will keep this group of stakeholder neutral and even supportive to The Project. On the other hand, negative information about the Project might change their stand and views about the Project.

**Leverage** (Low Interest, High Influence): These stakeholders are highly influential to the Project, but they do not have a lot of interest to the Project. This group of stakeholders need to be satisfied and to leverage them for the good of the Project.

**Engage** (High Interest, High Influence): Key stakeholders, they have a lot of influence and strong interest in the outcomes of the Project. Building strong relationship with these stakeholders is crucial to get their full support for the Project. Consult them wherever possible or required on matters related to the Project activities, involve them in decisions and engage regularly.



**Figure 4-1 Stakeholders' Interest and Influence**

In determining level of interest and influence, **Table 4-1** and **Table 4-2** provide guidelines and details for examples of each level of interest and influence.

**Table 4-1 Level of Interest**

Level of Interest	
Level	Examples
1. Very High	Stakeholders with very high interest on the Project activities positively and/or negatively. The interests have been or can be demonstrated in many ways and actions, such as asking for compensation for resettlement, land possession in the project area, possess important positions and roles in the public sphere and/or among communities.
2. High	Stakeholders with high interests on the project activities positively and/or negatively with limited ability demonstrate or channel their interests to the Project activities.
3. Medium	Stakeholders with medium interest to the project activities positively or negatively with limited ability to demonstrate their interests to the Project. Their stand/position might be influenced by the mass.
4. Low	Stakeholders with little or no interest to the project activities.

**Table 4-2 Level of Influence**

Level of Influence	
Level	Examples
1. Very High	Those that can APPROVE or STOP the project, e.g. primary approvers such as permitting authorities, anyone that can refuse access to land or deny permissions
2. High	Stakeholders that are well connected into government and other organizations, have ability to put pressure on authorities, ability to gain media and public support, or are well respected publicly and people listen when they talk
3. Medium	Some level of influence as above but at a smaller or only local scale
4. Low	No public profile, no connections, largely unknown to others

Additionally, in analyzing stakeholders, some additional criteria below also need to be considered:

- **Contribution:** Does the stakeholder have information or expertise that could be helpful to the company?
- **Legitimacy:** Does the stakeholder have any legitimacy to be engaged?
- **Willingness to engage:** Is the stakeholder interested to engage with the company?
- **Influence:** How much influence does the stakeholder have, could they influence other companies, NGOs, or others that relate to the company in some way?
- **Necessity of involvement:** Is this a stakeholder who could cause trouble if not engaged?

Once the stakeholder’s influence and interest has been identified according to the above mentioned criteria, a strategy and format of engagement as well as type of communication style for each

stakeholder can be determined and developed. Those with a high influence and interest in the project should be given high priority and be actively engaged, whenever applicable, in the form of joint venture, partnership, research collaboration, and summit. Those of medium priority (monitor and leverage) have a high willingness to engage or a high level of expertise, should be communicated with on a regular basis through providing sponsorship, involve in survey, sent mass email or newsletter, communicate through social media, and invited to a conference. Those who are categorized in low priority need to be informed regarding PEC information such as marketing campaign, sustainability report, publication, and news coverage.

Tactics	Format
<b>Engage</b> (high priority)	Joint venture
	Partnership
	Research collaboration
	Summit
<b>Communicate</b> (medium priority)	Sponsorship
	Survey
	Mass email or newsletter
	Social media
<b>Inform</b> (low priority)	Conference
	Marketing campaign
	Sustainability report
	Publication
	News coverage

Source: BSR, Back to Basics: How to Make SHE Meaningful for Your Company, 2012

**Figure 4-2 Strategy and Format of Engagement**

Strategy and format of engagement for each category of stakeholders is presented in **Figure 4-2**. The table below shows the identified key stakeholders for PEC (**Table 4-3**) and stakeholder mapping and analysis. The list has been populated using provided documentation and professional judgement.

**Table 4-3 PEC’s Key Stakeholders**

Category	Name of Stakeholders	Priority	Type of Engagement
Directly Affected Communities			
Communities	Ketua Kampung (KK) Lepau, Kg Bukit Pelali, Kg Bukit Buloh, Kg Bukit Gelugor, Kg Bukit Raja, Taman Rengit Jaya, Kg Santi	High	Engage
	JKKK (Jawatan Kuasa Kemajuan dan Keselamatan Kampung)	High	Engage
	Penghulu Mukim Pengerang and Pantai Timur	High	Engage

Category	Name of Stakeholders	Priority	Type of Engagement
	Project affected communities (Individual/families having the potentials to get affected by economic loss, loss of access to livelihood resource/community resource due to PEC's operation)	High	Engage
	Land Claimants (If any)	High	Engage
	Vulnerable groups	High	Engage
	Local Communities and communities in general, Local-based school teachers, Local-based cultural, Religious, Youths, Women Associations including Religious leaders-Ulamaks/ Pastors/ Priest/ Youth/ Women leaders.	Medium	Communicate
Indirectly affected			
Government	Department of Environment	High	Engage
	Department of Marine		
	Department of Planning and Development Pengerang	High	Engage
	Department of Irrigation and Drainage	High	Engage
	Department of Occupational Safety and Health	High	Engage
	Fisheries Development Authority of Malaysia	High	Engage
	District Council Kota Tinggi	High	Engage
	Peninsula Forestry Department	High	Engage
	Johor Forestry Department	High	Engage
	Johor Port Authority	High	Engage
Educational/ Research Institution	University Teknologi Malaysia (UTM)	Low	Inform
	University Tun Hussein Onn Malaysia (UTHM)	Low	Inform
	Other Research Institution (need to be identified)	Low	Inform
NGOs	Malaysian Environmental NGOs	High	Engage
	Wetlands International Malaysia	High	Engage
	Suhakam (Human Rights Commission of Malaysia)	High	Engage
	World Wide Fund for Nature (WWF) Malaysia	High	Engage
CBO	Koperasi Pengerang Jaya Johor Berhad (Kopeja) Koperasi Jaya Teluk Ramunia (Kojaya)	High	Engage
GLCs (Government)	Johor Corporation	High	Engage

Category	Name of Stakeholders	Priority	Type of Engagement
Link Companies), Public and Private Companies	Pengerang Integrated Petroleum Complex (PIPC) Pengerang Integrated Complex (PIC) Pengerang Deepwater Terminal (PDT) Pengerang Integrated Development Project (PIDP) Pengerang Eco-Industrial Park (PEIP) Pengerang Commercial Centre (PICC) Pengerang Industrial Park (PIP) Bukit Pelali Properties Sdn Bhd Cypress Potential Sdn Bhd, Sebana Cove Resort	Low	Inform
Media Institutions	New Strait Times, The Start, The Sun	Medium	Communicate
	Berita Harian, Utasan Malaysia		
	Malaysia News Agency: Bernama		
	Television: TV3, TV2, TV1		
	Other news and media agencies		

## 5 Stakeholder Engagement Plan

The purpose of stakeholder engagement, as stated in Performance Standard 1 GN 6 IFC Standard, is to establish and maintain a constructive relationship with a variety of external stakeholders over the life of the project. This chapter discusses means and frequency of stakeholder engagement.

### 5.1 Means and Frequency of Stakeholder Engagement

#### 5.1.1 Means of Stakeholder Engagement

Below is a range of engagement activities that can be utilized by PEC. These are detailed in **Table 5-1**. Details of type, form, and method of engagement, where suitable, are discussed on disclosure of information and public consultation section.

**Table 5-1 Type, Form, and Method of Engagement Activities**

Type/Form/Mode	Description
<i>Face-to-face Individual Briefing (Engage)</i>	Individual briefings provide a high level of project detail, and allow for concise feedback, in a personal environment. Individual briefings are to be held with regulators, government officials, local people in the surrounding area and local high priority stakeholders to improve understanding of issues such as project timeframe, environmental, economic and social benefits and proposed management tools. They are particularly useful in facilitating favorable consideration of a project by government agencies.

Type/Form/Mode	Description
<i>Face-to-face Group Meetings (Engage)</i>	Group meetings are used to communicate key strategies to stakeholders, allowing many interested parties to attend. They are used when determining partnership opportunities and collaboration with stakeholders, particularly during the construction and operational phase.
<i>Workshops (Engage)</i>	Workshops allow stakeholders to explore key issues, provide feedback and develop action plans which are owned by those affected by them or who will implement them.
<i>Focus Groups Discussion (FGD) (Engage)</i>	Focus group discussions are used when a Project issue requires specific discussion or exploration. For instance, these could be appropriate when developing mitigation strategies or with other companies about partnering in community development programs. A skilled facilitator is often needed to ensure outcomes are achieved and to ensure appropriate involvement; timing and a neutral venue are also critical.
<i>Public Displays (Inform)</i>	Public displays are used to promote key progress during the investigation and development schedule, such as at the commencement of construction. Public displays are a non-invasive way of displaying Project infrastructure layout and gathering feedback. They can be held in public markets or at a local shop front.
<i>Correspondence (phone, letter, email) (Communicate)</i>	Phone conversations are used by Project personnel to secure partnerships, letters will be issued for invitations to briefings and email alerts will be sent to invite comment or alert stakeholders to issues. Correspondence with government officials during the approvals phase are logged in the stakeholder database.
<i>Newsletters and flyer (Inform)</i>	Newsletters and flyer allows PEC to keep stakeholders on the database regularly informed about key Project developments such as the commencement of the construction phase. Newsletters allow for the incorporation of graphics (illustrations and photographs) and design in the communication stream. Written material may need to be translated for some local people.
<i>Media Campaign (Inform)</i>	A media campaign is required to promote key Project milestones. Most media campaigns include elements of advertising, speeches and press releases that allow for clear, simple information dissemination to the community within a short time. This would be a component of the Media Strategy.
<i>Seminar (Communicate)</i>	Seminar can reach a wider academic/ nonacademic audience. Normally, seminar is to deliver new finding or information regarding general information and project specific information with Independent character. Seminar also allows for presentation, discussion, constructive critic, and recommendation. Also, it may connect with other stakeholders to organize the event.

### 5.1.2 Disclosure of Information

Information disclosure is the first step in stakeholder engagement activities. The term disclosure is used for making information available and accessible to interested and affected parties. Communicating such information in a manner that is understandable to stakeholders is an important step in the process of stakeholder engagement. The disclosure of information will be more

constructive if stakeholders, including affected communities, have accurate and timely information about the project, its impacts, and any other aspects that may affect them.

Information disclosure may also include proposed project plan (design construction, operation and decommissioning), potential benefits and disadvantages of the project, proposed environmental and social management plan, project progress updates, project's CSR/Community Development Plan and program, project changes, grievance mechanism, and community health and safety considerations. Information disclosure also covers indigenous people resource rights (land, forests, tenure systems, government established compensation frameworks), and security arrangement for the project.

At every stage of project development, information that is being disclosed should be adapting the procedures, such as transparent and accountable; apply good practice principles, weigh the risks and benefit, and manage information on sensitive and controversial issues.

Information disclosure through public announcement can be disseminated through:

- Public consultation, face to face public dissemination, workshop;
- Brochures, posters or flyers, banner prepared to visually explain the project;
- Correspondence (phone, letter, email)
- Media campaign through mass media, radio, television: press releases, company publication (website), media kits;

### 5.1.3 Consultation

The approach of consultation is as a two-way flow of information where stakeholders, families, individuals, communities or organizations are empowered to participate in decisions that affect them. Consultation takes a variety of forms: facilitated public meetings/ workshop, focus group discussions (FGD), one-on-one (individual/ group face to face) interviews, seminar. Multiple formats of interaction offer more holistic understandings of stakeholder's opinions, values, insights and recommendations. Consultation also provides opportunity for PEC to learn from communities' experience, knowledge, and concerns; manages expectation of community; identify decision maker in community; consultation after identification of risks and impacts; and Informed Consultation and Participation (ICP) process.

## 5.2 Frequency of Engagement Activities

The stakeholder engagement plan for PEC is shown in Table 5-2 Stakeholder Engagement Plan. Data of stakeholders is collected from secondary data in the Environment Impact Assessment and Social Impact Assessment Report.

**Table 5-2 Stakeholder Engagement Plan**

Category	Stakeholders	Engagement Activities	Key Concerns Specific to PEC	Frequency
Communities	Ketua Kampung (KK) Lepau, Kg Bukit Pelali, Kg Bukit Buloh, Kg Bukit Gelugor, Kg Bukit Raja, Taman Rengit Jaya, Kg Santi	Engage through face to face individual meetings or group meetings, focus group discussion, workshop. Affected communities to be involved in Company's CSR program.	Affected communities concern about land claim, livelihood, job and business opportunity, impact and mitigation	Regularly, i.e. every 1-3 months or as required to provide information about the impact and recruitment of labor for PEC, grievance progress
	JKKK (Jawatan Kuasa Kemajuan dan Keselamatan Kampung)			
	Penghulu Mukim Pengerang and Pantai Timur			
	Project affected communities (Individual/families having the potentials to get affected by economic loss, loss of access to livelihood resource/community resource due to PEC's operation)			
	Land Claimants (If any)			
	Vulnerable groups			
Communities	Local Communities and communities in general, Local-based school teachers, Local-based cultural, Religious, Youths, Women Associations including Religious leaders-Ulamaks/ Pastors/ Priest/ Youth/ Women leaders.	Communicate through correspondence (phone, letter, email), as well as through involving these groups in the seminar. These groups to be involved in Company's CSR program.	Related to socio economic and cultural condition of affected communities, CSR program, and partnership	Bi-annually or as required
	Government Agencies	Engage and communicate through face to face individual meetings or group meetings, focus group discussion, workshop and	Normally, the government agency concerns on the compliance on rule and regulation set by the	Monthly, Quarterly, and Yearly or as required.
Department of Environment				
Department of Marine				
Government Agencies	Department of Planning and Development Pengerang			

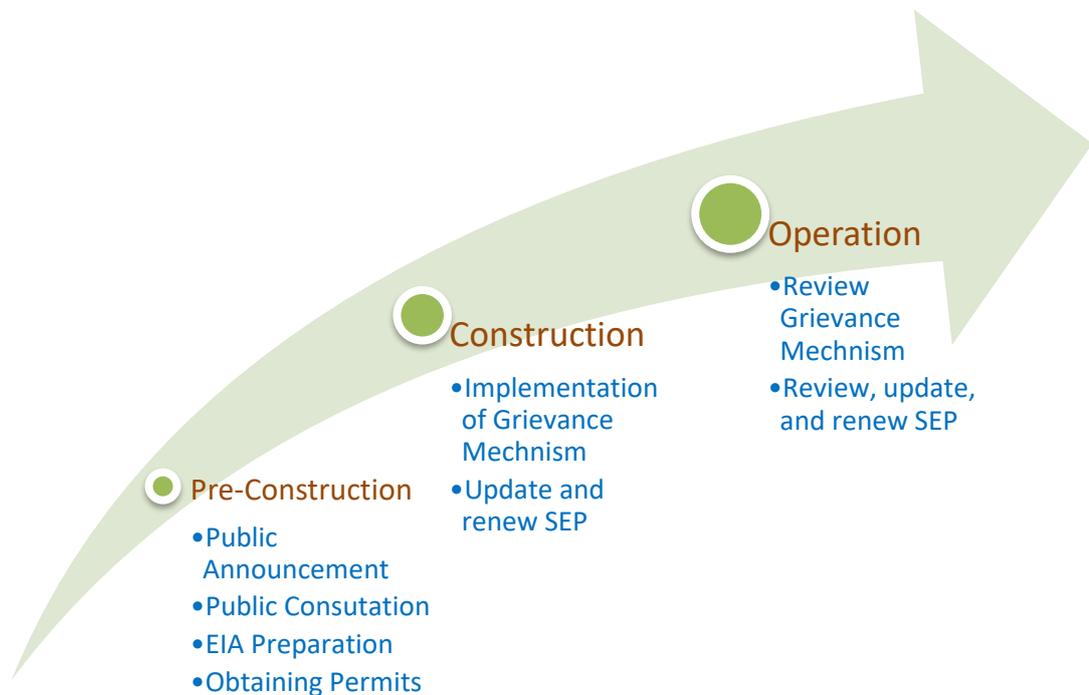
Category	Stakeholders	Engagement Activities	Key Concerns Specific to PEC	Frequency
	Department of Irrigation and Drainage Department of Occupational Safety and Health Fisheries Development Authority of Malaysia District Council Kota Tinggi Peninsula Forestry Department Johor Forestry Department Johor Port Authority	correspondence (phone, letter, email), The engagement activities are also in the form partnership in community programs.	government. Further assessment is needed	Frequency can be determined based on level of influence and power.
Educational/ Research Institution	University Teknologi Malaysia (UTM) University Tun Hussein Onn Malaysia (UTHM) Other Research Institution (need to be identified)	Inform these stakeholders through newsletters and flyer, media campaign, public displays. Other form of engagement is through seminar or support in workshop or public discussion, research collaboration, student intern,	Research collaboration opportunity	Yearly or as required
NGOs	Malaysian Environmental NGOs Wetlands International Malaysia Suhakam (Human Rights Commission of Malaysia) World Wide Fund for Nature (WWF) Malaysia	Engage through face to face individual meetings or group meetings, focus group discussion, workshop.	Sustainability, environment protection, community relation, community livelihood, and human right	Yearly/ Bi-annually or as required or more regularly
CBO	Koperasi Pengerang Jaya Johor Berhad (Kopeja) Koperasi Jaya Teluk Ramunia (Kojaya)	Engage through face to face individual meetings or group meetings, focus group discussion, workshop.	Affected community concerns, livelihood Socio Eco, Education, job and Business opportunities	Quarterly or as required



Category	Stakeholders	Engagement Activities	Key Concerns Specific to PEC	Frequency
GLCs (Government Link Companies), Public and Private Companies	Johor Corporation	Engage and communicate through face to face individual meetings or group meetings, focus group discussion, workshop and correspondence (phone, letter, email), The engagement activities are also in the form partnership in community programs.	Business relationship	As required
	Pengerang Integrated Petroleum Complex (PIPC) Pengerang Integrated Complex (PIC) Pengerang Deepwater Terminal (PDT) Pengerang Integrated Development Project (PIDP) Pengerang Eco-Industrial Park (PEIP) Pengerang Commercial Centre (PICC) Pengerang Industrial Park (PIP) Bukit Pelali Properties Sdn Bhd Cypress Potential Sdn Bhd, Sebana Cove Resort	Inform these stakeholders through newsletters and flyer, media campaign, public displays.	Business relationship	As required
Media Institutions	New Strait Times, The Star, The Sun	Inform these stakeholders through newsletters and flyer, media campaign (Press release, corporate advertising), public displays.	Source of information for news	As required depend on activities of the project. PEC needs to respond and provide clarification if required to any news covered PEC.
	Berita Harian, Utasan Malaysia			
	Malaysia News Agency: Bernama			
	Television: TV3, TV2, TV1			
	Other news and media agencies			

## 6 Timetable

The scope of this SEP is to cover stakeholder engagement activities over life cycle of the project. This SEP will be updated and adjusted accordingly. **Figure 6-1** show general activity of stakeholder engagement and consultation during pre-construction, construction, and operation phase.



**Figure 6-1** Stakeholder Engagement during Lifecycle project

## 7 Resource and Responsibilities

PEC assigned Community Relation team to undertake the proposed stakeholder engagement activities and grievance address mechanism. shows organization structure for stakeholder engagement. The unit is responsible for establishing and maintaining company relationships with project affected communities, NGOs, CBOs, research organization, media, local government and informal leaders. The project manager will oversee the performance of SEP implementation such as proper identification of stakeholders, number of new stakeholders identified, number of grievances addressed and solved, and level of stakeholders' satisfaction to the company's responses, and effective dissemination of Grievance Mechanism. The specific organization, resource and responsibilities will be revisited over the life-cycle of the Project to adjust and adapt to changing circumstances.

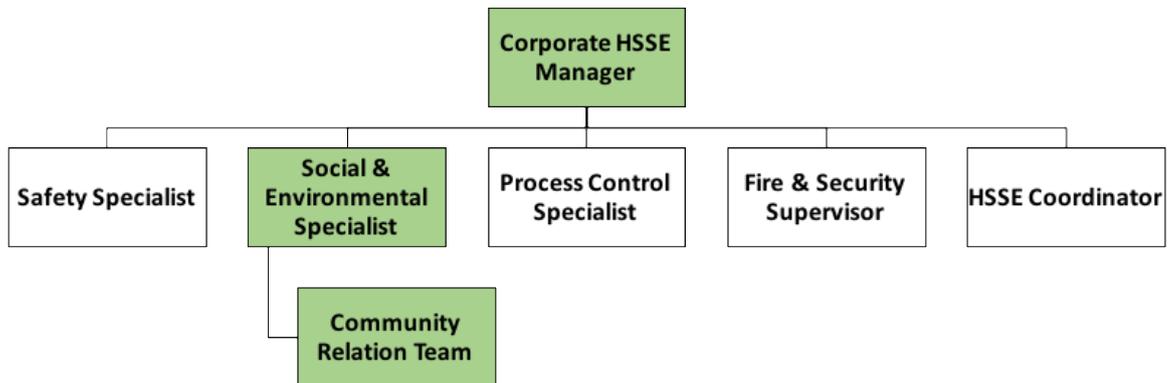
### 7.1 Human Resources

Human resource is responsible to hire, train, and deploy the right staff to the field to implement stakeholder engagement program properly. The new/ promoted staff is expected to perform the function effectively, understands local culture and customs, and is able to fulfil practical and administrative work loads in the SEP. Community Relation team communicates the stakeholder

engagement strategy to all staffs, particularly related to Grievance Mechanism. Thus the company's employees in general understand engagement plans and activities with external stakeholders and integrate them into daily operation. Company employees are considered 'ambassadors' of the company among communities and stakeholders, therefore any employee could be approached at any time by external stakeholders with regards to company and project activities.

## 7.2 Responsibilities

To ensure a consistent and effective engagement process during the Project lifecycle, PEC have a clear understanding of its roles, responsibilities and processes to undertake engagement activities. The strategy is to direct specific engagement activities to relevant Company departments based stakeholder areas. The role/ responsibilities for stakeholder engagement activity, including for grievance mechanism, on organogram is outlined below:



**Figure 7-1** PEC HSSE Organization Chart

**Table 7-1 Roles and Responsibilities**

Position	Roles and Responsibilities
<b>Corporate HSSE Manager</b>	<ul style="list-style-type: none"> <li>• Heading the function for HSE for PEC Project based in the corporate role. He will be responsible for making the project strategy for implementing safety culture, HSE governance. Formulating Occupational Safety and Health Environmental management system for the project. Also Managing the government agencies and other stake holders related to Environment and Health.</li> </ul>
<b>Social and Environment Specialist</b>	<ul style="list-style-type: none"> <li>• Responsible for the Social and Environmental aspect and the compliance as per the government norms. Produce, implement, and control project specific documents, coordinate safety activities, procedures and policies, and disseminate them regularly.</li> </ul>
<b>Community Relation Team</b>	<ul style="list-style-type: none"> <li>• Develop, engage, and maintain relationships with stakeholders, and public in general at provincial, regency, district, and village level;</li> <li>• Identify and analyze external stakeholders relevant to the Project;</li> <li>• Identify the stakeholder potential risk and impact/problems due to project activity and propose method of risk minimization or problem solving;</li> <li>• Develop, plan, propose and implement stakeholder development and social programs in accordance with work plan &amp; budget and the objectives and policy of the company.</li> <li>• Develop, coordinate and maintain a stakeholder database</li> <li>• Prepare information materials and protocols for dissemination</li> <li>• Facilitate meetings, forums and newsletters for stakeholders</li> <li>• Manage, investigate, and analyze grievances</li> <li>• Propose corrective action</li> <li>• Work with third party to solve and closed out grievances</li> </ul>

### 7.3 Financial Resources and Budgeting

This section is to provide budgeting and funding allocation suggestion for SEP implementation and management. The budget shall be catered in accordance with needs and stages of project development. Stakeholder engagement budget will increase gradually to commensurate with Project development. The budget does not include any compensation in response to any grievances. Breakdown budget allocation cannot be provided at the time of preparing this document.

## 8 Grievance Mechanism

The Grievance Mechanism (GM) describes the process of an available channel for affected people (and other interested or concerned parties) to lodge a complaint or express a grievance against the project, staff or contractors. Grievances may arise from local hiring, unplanned impacts and infrastructure damage as they relate to the Project’s environmental and social commitments. The GM also describes company procedures, roles and responsibilities for addressing grievances and resolving disputes appropriately and in a timely manner. PEC has developed its own Grievance

Mechanism as a part of company's Environmental and Social Management System for the project. However, PEC will assure that contractors also have their own grievance procedure which should align with the PEC Grievance Procedures.

Grievance Mechanism for PEC workers is not covered in this Grievance Mechanism as it is related to working conditions and terms of employment.

## 8.1 Objective

As stated in the PEC's Grievance Management Procedure (GMP), objectives of Grievance Mechanism are:

- Establishing a mechanism for responding to grievances in an understanding, transparent and culturally suitable manner.
- Developing an easy access, no cost and efficient grievance procedure for project affected peoples and other stakeholders.
- Ensuring effective dialogue and open lines of communication with the public.
- Helping to prevent unrealistic expectations and/or negative perceptions from the local population towards the Project.
- Establishing a system of investigation, response and quick grievance resolution.
- Reducing the number of grievances received over time.
- Improving social performance through the analysis of grievances and refinement of work practices.
- Ensuring that non-compliances with project environmental and social commitments are adequately corrected in a timely fashion and are subsequently monitored.

## 8.2 Grievance Process

The following section presents a grievance process as outlined in the diagram below (**Figure 8-1**). The grievance process is iterative and attempts to address concerns and issues raised by communities and stakeholders through a number of measures. The grievance mechanism addresses all types of grievances that may arise from local hiring, unplanned impacts and infrastructure damage. PEC categorized direct impact grievance as follows: Possible impacts on marine life; Possible impacts on fish and fisheries catch; Job issues; Third party injuries or conflicts; Damages to infrastructure; Loss of livestock (goats, cows); Damage and temporary interruption of access roads; Road congestion; Nuisance caused by noise or dust; Unplanned use of land; Environmental issues (soil and water contamination, erosion, damage to wildlife or vegetation, hunting and fishing, improper right of way restoration etc.); Behaviour of personnel; Community health and safety; Cultural issues. This mechanism is for Project use only. The conceptual steps for managing a grievance are outlined below.

### 8.2.1 Grievance Procedure

#### **Step 1 – Complaint /Grievance/Statement is submitted:**

Grievances can be submitted in either oral or written form, by Project affected peoples or other persons, to Community Relation team. PEC will keep confidentiality of the complainant(s). Grievances can be submitted through:

- Verbally through Community Relations team within the Sustainability Department
- Telephone +65-65367055

- Email [info@pengerangenergy.com](mailto:info@pengerangenergy.com)
- Letter to address: Unit 30-01, Level 30, Tower A, Vertical Business Suite Avenue 3, Bangsar South, No 8, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia
- Website <https://www.pengerangenergy.com/contact.html>

**Step 2 – Complaint/Grievance/Statement is received and acknowledged:**

PEC acknowledges that any grievance submitted by complainant is received as soon as possible. Within seven days after the grievance submitted, PEC also will inform the complainant a response. The timeframe to resolve grievance is within 30 days and can be extended to 60 days for more complex grievances.

**Step 3 – Complaint is registered:**

Grievances are formally recorded in a Grievance Form (Appendix 2) and documented in the Grievance Register. The Register will be maintained by Community Relations team or relevant company staff.

PEC will start recording grievance and logged it into a central grievance mechanism database within 3 business days. A case number will be assigned and records of communication/consultation will be attached to grievance database. The grievance log/ data base is also to ease the tracking and monitoring process.

**Step 4 – Complaint Analysis & determination of corrective action:**

Community Relations team is responsible for action and responses to grievances lodged. The team will analyze and verify the grievance and consider the complaint, and determine an appropriate corrective action, in consultation with the complainant.

**Step 4 – Discussion with complainant:**

PEC will arrange first meeting with complainant within the timeframe. If it is resolved, the grievance is closed.

However, if unresolved, following step is taken as follow

**Corrective action is implemented:**

PEC and/or the contractor will conduct investigation of the grievance and will involve other departments, contractors and senior management as required. If required, local authority may also be invited to attend the investigation. Determination of corrective action(s) or mitigation of the grievance will be conducted by Community Relations team in consultation other departments, including nature of the corrective action; implementation timeframe; person in charge; and record in grievance log.

**Step 5 – Outcome of the corrective action is verified with the complainant:**

Following completion of the corrective action, complainant will be asked to sign off the acceptance if he/she satisfies with corrective action. The grievance is closed and subject to 15 days monitoring period.

If unresolved, the grievance is escalated to the next level

**Step 6 – Other avenues/ third party approach:**

In the event that the complainant remains dissatisfied with the outcome or the grievance cannot be resolved, additional corrective action may be agreed upon and carried out by PEC. Where necessary, an external third party or the Grievance Committee can be assigned as mediator. This third party will be neutral, well respected, and agreed upon by both PEC and the complainant(s). Grievance Committee will include Community Relations team leader, representatives from PEC, EPC Contractors and at least two representatives from local communities. If the avenue is still can't solve the grievance, Community Relations team to a specially-formed grievance committee which may include local representation from the authorities. Once the complainant accepts the resolution being offered by the Grievance Committee, the complainant will be asked to sign off the complaint. The grievance will be marked as closed out in the complaint log within GM timeframe.

If the grievance is unresolved through the involvement of third party, following step is taken.

### Step 7 – Legal action

In the event the complainant is still dissatisfied, and no satisfactory response can be negotiated even with third party involvement, the grievance may remain unsigned but still deemed redressed. Complainants will be informed of their legal rights as a last resort. The complainant has recourse to the pre-judicial and judicial processes available in Malaysia. The legal rights and responsibilities of all parties and stakeholders will be respected and upheld by PEC legal unit.



Figure 8-1 Steps of Grievance Mechanism

## 9 Monitoring and Reporting

### 9.1 Monitoring

Monitoring stakeholder engagement is a process of periodically collecting information on the implementation of the stakeholder engagement plan and to understand current progress of implementation. A process of establishing monitoring criteria is an initial phase of development which then helps to improve practices and implementation in the future, receive accountability internally and externally related to resources used. The results to be analyzed will provide a background for planning better initiatives for project operation, and also for deciding on future action.

The following SEP activities require monitoring and evaluation from assigned personnel and team in the Project:

- Implementation of SEP that includes update of stakeholder database and issues, as well as documentation of stakeholder engagement activities. Throughout the project life, PEC will maintain open communication channels with relevant stakeholders as identified. Any additional stakeholders identified during the lifecycle will also be added and communication with them will be initiated.
- Implementation of Grievance Mechanism as part of SEP which includes dissemination of Grievance Mechanism, grievance logging and tracking, effectiveness of grievance management, and number of grievances solved.

Several mechanisms may be implemented as part of the action plan to assist in the collection, measurement and analysis of engagement activities, which includes direct surveys of priority stakeholder groups; evaluation sessions following events such as workshops; and Project internet site. Evaluation of SEP implementation will be carried out at least annually. Evaluation is essential to provide feedback to improve Project SEP and enhance Project-stakeholder relationship.

### 9.2 Reporting

The reporting of stakeholder engagement activities will be undertaken throughout the Project. This will help facilitate continuous improvement of the engagement process.

Stakeholder engagement activities and significant changes or updates in the project and upgrade, stakeholders' concerns, as well as environmental and social issues will be continuously reported and published to a wider audience in a transparent way through public domain documents and websites such as Company's sustainability report, annual report, Company website, newsletters, articles, local media and other outreach tools.

All action plan requirements and stakeholder engagement activities shall be audited in terms of whether they have been undertaken and the extent to which they have been effective in the context of the Plan's stated objectives and Key Performance Indicators (KPIs) as outlined in **Table 9-1**.

**Table 9-1 Proposed Stakeholder Engagement Targets and Indicators**

Stakeholder Engagement Plan Objectives	Target	Key Performance Indicators
Identify known and potential stakeholders and Project issues and ensure they are prioritized	Stakeholder database compiled and regularly reviewed and updated (half yearly) New issues logged and responses developed, such as a Q&A All media report positive news and information about the Project	Number of times database refreshed Percentage of outstanding issues Type and frequency of media reports
Develop appropriate methods of engagement for new stakeholder groups	Priority and engagement level of each stakeholder reviewed (monthly) Priority stakeholders have been engaged in an identified activity within the determined time frame Engagement activities occur within timeframes detailed in the SEP Engagement activity is logged in stakeholder database Formal feedback obtained from engagement activity participants and evidence of action taken as a result	Number of times database refreshed Number of contacts Percentage of scheduled activities that occur Number of updates to database per month Stakeholder satisfaction with engagement process
Identify the need for new engagement strategies, such as a media strategy, to support the stakeholder engagement process	Stakeholder issues logged in database Regular review of issue responses and development of PEC response All issues encompassed in the SEP and mitigated	Number of new issues Number of issues resolved, responses developed Decrease in unaddressed issues Decrease in staff time in issues resolution
Outline internal actions and responsibilities for implementing new engagement activities	Internal responsibility for implementation clear and known by all operational staff Reporting process for progress against action plan timelines and targets incorporated into Corporate Executive Reporting	Level of staff awareness of stakeholder strategy and responsibility Level of staff awareness of disclosure policy

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### Appendix 1 Stakeholder Database

No.	Organization / Company	Contact Persons	Work Phone	Cell Phone	Fax	Email	Category
1	Jabatan Alam Sekitar Negeri Johor Wisma JAS Johor No. 46, Jalan Pertama, Tower 2, Pusat Perdagangan Danga Utama 8130 Johor Bahru						
2	Jabatan Pengairan dan Saliran Malaysia Jalan Sultan Salahuddin 50626 Kuala Lumpur						
3	Jabatan Pengairan dan Saliran Negeri Johor Aras 3, Bangunan Dato' Mohamad Ibrahim Munsyi, Pusat Pentadbiran Kota Iskandar, 79626 Iskandar Puteri, Johor						
4	Yang Dipertua Majlis Daerah Kota Tinggi Jalan Padang, 81900 Kota Tinggi, Johor						
5	Lembaga Kemajuan Ikan Malaysia Wsima LKIM, Jalan Desaria, Pulau Meranti, 47120 Puchong, Selangor						
6	Jabatan Keselamatan dan Kesihatan Pekerjaan Aras 1, 3, 4, % 5 Blok D4, Kompleks D, Pusat Pentadbiran Kerajaan Persekutuan, 62530 W.P. Putrajaya						
9	Jabatan Perhutanan Semenanjung Malaysia Jalan Sultan Salahuddin 50480 Kuala Lumpur						



No.	Organization / Company	Contact Persons	Work Phone	Cell Phone	Fax	Email	Category
10	Jabatan Perhutanan Negeri Johor Tingkat 2, Bangunan Dato' Mohammad Ibrahim Munsyi, Kota Iskandar, 79660 Iskandar Putri, Johor						
11	Jabatan Laut Malaysia Ibu Pejabat Laut, Peti Surat 12, Jalan Limbungan 42007 Pelabuhan Kelang, Selangor						
12	Lembaga Pelabuhan Johor Jalan Mawar Merah 2, Pusat Perdagangan Pasir Gudang 2, 81700 Johor						



## Appendix 2 Grievance Form

Grievance Action Form			
Part – A	Location:	Complaint Number (to be taken from the consultation tracking database)	Date Received:
Name :		Method of Response	
Address:		Verbal in Person <input type="checkbox"/>	
Contact Number:		Verbal on Telephone <input type="checkbox"/>	
		Written – handed <input type="checkbox"/>	
		Written – Email <input type="checkbox"/>	
		Written – Notice Board <input type="checkbox"/>	
<b>Part B COMPLAINT</b>			
Description:			
Name:			
Signature:		Date:	
<b>Part C Response from PEC</b>			
Description:			
Name:		Position:	
Signature:		Date:	
<b>Part D Verification of Response and Corrective Action if required</b>			
Follow Up details:			
Close Out Date:		Signature:	
<b>Part E Acknowledge Receipt of Response</b>			
Name:			
Signature:		Date:	



### Appendix 3 Grievance Log/ Grievance Database

Sr.No	Code	Date	Name	Organization	Contact	Description	Method	Action Outcome	Responsible	Result	Target Date of Completion	Actual Completion Date	Status	Re-apeal	Date