Stakeholder Engagement & Information Disclosure Plan for GKEL

GMR Kamalanga Energy Pvt Ltd, Odisha

Executive Summary

Revised in October 2016

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CONTENTS

1 EXECUTIVE SUMMARY OF STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE PLAN FOR GKEL

1.1 INTRODUCTION

This stakeholder engagement plan prepared for GKEL is based on review of the existing stakeholder management practices and intends to further strengthen its relationship with affected communities and other stakeholders.

1.2 PRINCIPLES OF GKEL STAKEHOLDER ENGAGEMENT FRAMEWORK

Keeping the requirement of IIF PS and 'Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets', the GKEL Stakeholder Engagement Framework need to be based on following principles:

- The stakeholder's interests are identified and verified though a process of learning about stakeholders;
- All interests/impacts relevant to the project and significant to sustainable development is recognized;
- A clear and legitimate process for the engagement with each stakeholder group is defined;
- Engagement is based on necessary information and objective understanding which is established through prior disclosure of verifiable information;
- The process of engagement with key stakeholders are planned and has well defined objective and outcomes;
- The process of engagement with key-stakeholders is properly documented; and
- Outcomes of the engagement process are internally tracked and learnings are incorporated to improve the quality of stakeholder engagement.

1.3 INFORMATION DISCLOSURE FRAMEWORK

Information disclosure is an integral part of the stakeholder engagement process. Information disclosure is not only indication of transparency, it is also essential for any meaningful engagement. The information disclosure activities take the level of education and language proficiency of target audience into consideration. Hence, non-technical summary of technical reports are proposed to be translated into the local language (Odia) for the ease of comprehension and understanding.

1.4 MAPPING OF GKEL DIVISIONS AND THEIR STAKEHOLDERS

The current engagement of different divisions within GKEL was compiled after interacting with GKEL staff heading these verticals and is provided below.

Table 2.1   *Stakeholders identified by each GKEL Division*

GKEL Division	Stakeholder Group
Corporate Relations and Communication	State and District Administration
	Government Ministries and Departments
	Press and Media
	Public/Elected Representatives
	Industry Associations- FICCI
	Department of Forest
Legal	Ministry of Corporate Affairs
	Department of Revenue
	Courts and Tribunals under which GKEL operates.
Technical Services	Service Contractors
	Suppliers
Security	Department of police
	Intelligence Bureau
	Local Community
	Employees and Indirect workers
Finance and Accounts	Direct employees
	Sub-contractors/Suppliers
	Indirect/contract employees
Operation and Maintenance	Boiler Inspector
	OPTCL-Electrical Inspectorate- Govt of Odisha
	GRIDCO
	Central Electrical Authority
	Power Grid Corporation India Ltd (PGCIL)
	Eastern Region Load Dispatch Center
	Odisha State Load Dispatch Centre
	Standard Testing Laboratories
	Weights and Measures
	Department of water resources
	Central Groundwater Authority (CGWA)
Coal	Indian Railways
	Mahanadi Coalfield Ltd
	Coal India Ltd
HR & FMS	Labour Inspector
	Factory Inspector
	Provident Fund
	District Administration
	Employment Exchange
	Labour Unions
GMRVF	Project Affected Families
	Local Communities
	Resource Organizations
	Department of Fisheries
	Department of Agriculture
	Department of Horticulture
Environment, Health and Safety	Ministry of Environment and Forests
	Odisha Pollution Control Board
	Central Pollution Control Board
	Directorate of Factories and Boiler

ENVIRONMENTAL RESOURCES MANAGEMENT   STAKEHOLDER ENGAGEMENT & INFORMATION DISCLOSURE PLAN-GKEL
PROJECT # I10834/0298450   OCT 2016

ES-2

1.5   STAKEHOLDER ENGAGEMENT ACTIVITIES

Action	Objective	Responsibility	Information to be Shared Prior to Engagement	Engagement Method	Place	Time/ Frequency	Means of Verification
Establish process of formal documentation of various stakeholder engagements by introducing a Stakeholder Register for each Department.	The objective is to improve the documentation practices and to create a databank for understanding external stakeholders. To create a system where staff-turn over does not affect the institutional relationship with external stakeholders.	Plant Head	Not applicable	Internal decision making and training if required.	Internal	Within one month from the date of submission of this report.	Each division has a physical or electronic stakeholder engagement register.
Disclose key principles and major components of the SEP as relevant to: • Local community • External Stakeholders Executive Summary of SEP and GRM are made available in the local language at common locations such as the facility gate, and Gram Panchayat offices in periphery villages	To reach out to external stakeholders and communicate willingness and procedures you set for planning and executing engagement processes.	CR/CC/Security HOD	Non-technical summary of SEP and GRM	Written communication, posters/bill-boards, web-posting	Gates, Notice Board, Web site	Within one month from the date of submission of this report.	The availability of these displays at these places or with their custodians.
Provide internal training to all the departments, with regards to the implementation of the SEP and GRM	Capacity building of the staff and bring uniformity in practices across the organization.	HR HOD	Internal circulation of SEP and GRM to all HODs	Written Communication Meetings	Internal	Within 45 days of submission of this report.	Minutes of meeting and attendance sheet
Tracking of NGOs and Civil Society and preparation of a monthly note	To identify and track the activities of NGOs operating in project area.	GMRVF/ CR/ CC/ Security-HOD	None	Tracking through media reports and direct social intelligence.	Internal	Quarterly Note	Quarterly Notes are shared in Management Review meetings.

Action	Objective	Responsibility	Information to be Shared Prior to Engagement	Engagement Method	Place	Time/ Frequency	Means of Verification
Tracking Press and Media Reports	To compile the news reports on and around the project.	CR-CC HOD	None	Tracking through media reports.	Internal	Monthly Note	Monthly Notes are shared in Management Review meetings.
Consultations with PAFs on selection of Livelihood assistance options.	To provide opportunity to PAFs for taking decisions on mutual understanding.	GMRVF/ CR-HOD	Translated copy of the executive summary of LRP to Gram Panchayat.	Individual face to face discussion/ group discussion	GMRVF office	complete all PAF consultation within 3 months of submission of this report	The sign on livelihood assistance benefit card
Organizing joint sporting or cultural events with local communities.	To create non-formal communication channels with local communities.	GMRVF/CR- and HR-HOD	None	Group Event	Community Place	Annual Event on Utkal Divas	Photos of the Event and Annual Report
Conducting Awareness Training in School Children on Fire Safety and Road Safety.	To familiarize communities with Plant operations and its sustainability practices.	GMRVF/HR/ Security-HOD EHS	None	Group Event	Plant Premise	Independence Day and Republic Day	Photos of the Event and Annual Report
Employee Engagement Programs for volunteering for community work.	To promote voluntarism among employees to contribute in community level works such as-cleanliness, community cooking, plantations etc.	HR/GMRVF/ CR-HOD	None	Participatory Activity	Villages in Periphery Area	Annual	Photos of the Event and Annual Report
Annual External Audit of CSR and Social Action Plans	To seek independent assessment of effectiveness of CSR activities and to identify community needs.	GMRVF/ CR -HOD	None	Third Party Report		Annual	Report Prepared and Disclosed

Action	Objective	Responsibility	Information to be Shared Prior to Engagement	Engagement Method	Place	Time/ Frequency	Means of Verification
Mid Term and Completion Audit of LRP implementation	Ongoing reporting of social performance of the project	HR / CR / SECURITY HOD	None	Third Party Report		Mid-Term after 24 months of commencement of LRP Implementation Completion Audit within 3 months of completion of LRP implementation	Report Prepared and Disclosed
Annual Review of SEP implementation	To understand effectiveness and efficiencies of stakeholder engagement process	Plant Head	None	Meeting	Internal	Annual	Review Report

1.6 INFORMATION DISCLOSURE ACTIVITIES

Action	Responsibility	Material Content/ Information	Disclosure Method	Place	Time/ Frequency	Means of Verification
The latest Half-yearly EC compliance report submitted to MoEF and a contact email id through which previous archived reports can be obtained.	EHS-HOD	Complete Report	Web site		within 1 month of this Report, and then within a week from submission of the report.	Access to these reports in web-site maintained
Disclosure of Environment and Social Performance Audit Reports: • ESDD Report by ERM, July 2014;	EHS HOD	Executive Summary and Action Plan	Website		within 1 month of this Report and within a fortnight of future reports.	Access to these reports in web-site maintained
Disclosure of LRP, GRM and SEP prepared by ERM and a contact person and place where the hard copy of the complete report can be accessed.	EHS HOD	Executive Summary of each report	Website	Gram Panchayat Offices	within 1 month of this Report	Acknowledgements Of Gram Panchayat Offices.

Action	Responsibility	Material Content/ Information	Disclosure Method	Place	Time/ Frequency	Means of Verification
Sharing of Odia translation of Executive (non-technical) Summary of LRP, GRM and SEP with Gram Panchayats	EHS HOD	Odia translation of Executive (non-technical) Summary		Gram Panchayat Offices	within 1 month of this Report	Acknowledgements Of Gram Panchayat Offices
Placing public notice of availability of LRP, GRM and SEP complete report with Sarpanch of the Gram Panchayats in their respective Notice Boards.	CR-CC- HOD	Notice in Odia		Gram Panchayat Offices	within 1 month of this Report	Photograph of the Notice and verification by a third party.
Quarterly Report of external monitoring of LRP implementation	CR-CC- HOD	Executive Summary and its Odia Translation	Web-site		In every Quarter- within 15 days of Final Report submission	The verification of the report
Mid-term Evaluation Report of LRP implementation	HOD- CSR	Executive Summary and its Odia Translation	Web-site		After 24 month from LRP implementation date	The verification of the report
LRP Completion Audit Report prepared by an external agency	HOD- CSR	Executive Summary and its Odia Translation	Web-site		After Completion of LRP Implementation	The verification of the report

1.7 DOCUMENTATION

Documentation of the stakeholder engagement and information disclosure activities are to be maintained in designated forms and formats. The key elements of stakeholder engagement to be documented are as follows:

- Maintaining a Stakeholder Register or database by each Department;
- Written documents of all agreements and commitments made to any stakeholder group;
- The periodic review and analysis reports of stakeholder engagement database;
  - o The key issues and concerns of every stakeholder;
  - o The responses and action taken on stakeholder feedback;
  - o The photographs of events, attendance sheets of meetings etc.;
- Monthly notes/presentations of SEP and GRM during management meetings;
- Proof of involvement of senior management in review and monitoring of SEP implementation.

1.8 MONITORING AND REVIEW

The monitoring of the SEP implementation will be part of the management functions. The monthly management meetings would include SEP and GRM notes/reports. The monitoring and review exercises will be internal and driven by senior management.

1.9 ONGOING REPORTING TO LOCAL COMMUNITY

GKEL will execute a range of activities involving local communities, for example joint sporting and cultural events, awareness campaigns, health camps, community counselling, etc. These occasions will be utilized to inform them about various E&S measures implemented by GKEL. Hence, the agenda of each of these events will include an E&S sharing session.

The information shared in these events will be documented and should be preserved for external auditors.

ENVIRONMENTAL RESOURCES MANAGEMENT   STAKEHOLDER ENGAGEMENT & INFORMATION DISCLOSURE PLAN-GKEL
PROJECT # I10834/0298450   OCT 2016

ES-7

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