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Community Engagement Guidelines

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Introduction

To support and provide a common industry-accepted approach to community engagement, API has compiled the best practices that operating companies should consider in their interaction with communities and stakeholders. This document is an accumulation of efforts currently undertaken throughout the oil and natural gas industry to proactively engage with communities during the project development process.

This document aims to help ensure that safe and responsible development of oil and natural gas resources is achieved with community and stakeholder input. API has revised the guidance within this document to address ongoing changes in industry practices, stakeholder expectations, and increased digital engagement. These updated guidelines include common communications and practices described by member company representatives, additional information regarding approaches for virtual engagement with stakeholders, emerging practices regarding environmental justice, and strategies and techniques highlighted by member companies and stakeholders.

In order to promote oil and natural gas development that results in a positive and beneficial experience for communities, recommended activities may align with community concerns and priorities, grounded in responsible practices and lessons learned from experiences. The industry's commitment to community engagement requires ongoing engagement and dialogue with local communities and other key stakeholders. Stakeholders, for use of the Community Engagement Guidelines, are defined as:

Any person, group or entity impacted by or with the ability to impact an organization and its activities is considered a stakeholder. Stakeholders can affect or be affected by the organization's actions, objectives, and policies.

Fostering broad stakeholder engagement through every phase of development, from operations to decommissioning, has become standard industry practice. Upstream operators can explain their plans and activities in a reasonable timeframe to community stakeholders. Then, operators may seek to identify, understand, listen, and respond to issues and concerns. Identifying and engaging stakeholders at the appropriate time and in a meaningful way allows for two-way communication, while involving stakeholders in identifying and managing potential community impacts helps establish trust and build mutually beneficial relationships. While a balanced resolution between industry and stakeholders remains ideal, some issues can present unique challenges.

Stakeholders have increased opportunities to articulate their voices and expectations regarding industry, social, and environmental issues. As such, these evolving stakeholder concerns influence what issues operators should address with their stakeholders. Stakeholders continue to express concerns on environmental, health and safety issues related to wildlife and ecosystems, emissions and climate change, and impacts on air and water quality. Engagement on these topics is critical. Simultaneously, operators can engage stakeholders through mutually beneficial opportunities, including employment, economic development, workforce development and training, and community investment.

Increased opportunities for virtual engagement also have shaped stakeholder and community expectations on the options by which they interact. While some stakeholders prefer in-person meetings, other stakeholders expect virtual engagement opportunities for safety and/or convenience. In addition to traditional mailing notifications, many stakeholders expect information to be available through email, social media, and websites. Operators have continued to innovate means of engaging stakeholders, soliciting feedback, and addressing or mitigating concerns.

Industry operations ~~also~~ have evolved. The Shale Revolution ~~has~~ prompted exploration and operation in communities previously unaccustomed to upstream oil and natural gas presence. Industry efforts toward decarbonization also are introducing to communities emerging energy technology and opportunities (and

growing opportunities with existing practices), such as carbon capture and storage (CCS)¹, carbon capture, utilization and storage (CCUS)², direct air capture³, geothermal energy⁴, and hydrogen hubs⁵. Increased focus on the energy transition will affect how communities relate to the oil and natural gas industry ~~and their understanding of a just transition~~. Environmental justice, social justice, ~~just transition~~, and the social costs of carbon have emerged as key policy themes affecting how operators may need to engage with communities in the future. Biodiversity and its intersection with communities, human rights and Indigenous People's rights also continue to gain momentum in the public eye.

Social media allows stakeholders to publicly share grievances related to perceived operational impacts on people and the environment. Grievances can be shared rapidly and widely and misinterpreted when taken out of context. Engaging proactively with communities provides operators an opportunity to address concerns before they escalate publicly, build trust, educate, understand local priorities, pre-emptively mitigate community impacts, and seek mutually beneficial solutions.

Understanding communities' unique values and interests and seeking stakeholder input into operational plans continues to be a vital component of how we operate. Each community has different attributes, interests, and needs. Understanding cultural attributes is a critical input in developing an engagement plan, from identifying potential barriers to participation to potential partnerships and investments.

A fall 2022 API survey of some member company representatives on upstream stakeholder engagement practices showed that while many operators are undertaking activities related to engagement, including stakeholder research, outreach, and feedback or grievance mechanisms, the industry has an opportunity to better promote these activities and relationships to continue demonstrating operators' active investment in communities.

Those involved in drafting this guidance document hope to encourage an ongoing two-way, meaningful dialogue between operators, partners, contractors, and communities and other stakeholders as it pertains to the safety, health and environmentally responsible performance of the industry. In addition, they hope that through ongoing stakeholder engagement, operators can successfully advance their projects while also having a continued dialogue about the role of these resources in serving the nation's need for energy security for generations to come.

Readers can utilize the interactive table of contents in Figure 1 to navigate to highlighted sections within the document.

¹ Carbon capture and storage (CCS) refers to the capture, transportation, and storage of carbon dioxide from industrial processes and energy production for storage or reuse.

² Carbon capture, utilization and storage involves the capture, transportation, utilization and storage of carbon dioxide from industrial processes to storage or use in a range of applications.

³ Direct air capture refers to technologies that extract and capture carbon dioxide directly from the atmosphere at any location.

⁴ Geothermal energy is a source of renewable energy that utilizes heat energy from the earth.

⁵ Hydrogen Hubs are networks of clean hydrogen producers, potential clean hydrogen consumers, and connective infrastructure located in close proximity.

API Bulletin 100-3

Interactive Table of Contents

Introduction

The 100-3 Bulletin aims to help ensure that safe and responsible development of oil and natural gas resources is achieved with community and stakeholder input. A stakeholder is defined as *any person, group or entity impacted by or with the ability to impact an organization and its activities is considered a stakeholder. Stakeholders can affect or be affected by the organization's actions, objectives, and policies.*

API has revised the guidance within this document to address ongoing changes in industry practices, stakeholder expectations, and increased digital engagement.

Principles of Engagement

- Respect
- Integrity
- Safety
- Environmental Stewardship
- Transparent, Responsive Communication

Plan

Complete a Community and Stakeholder Assessment to learn about your communities, identify key stakeholders/needs, and consider potential impacts and mitigations. **Learn more about:**

- Stakeholder mapping
- Environmental and Social Justice
- Indigenous Engagement

Do

Develop a Community Engagement Plan by identifying useful engagement activities, communication strategies, and feedback mechanisms. **Learn more about:**

- Building trust
- Communication methods
- Accessibility
- Rapid response planning
- Community investment

Check & Act

Evaluate your engagement activities and update Engagement Plans as needed.

Learn more about:

- Collecting Feedback
- Complaint and/or Grievance mechanisms
- Successful Engagement

5 Phase Model

Dive deeper into when engagement activities may need to occur during the entry, exploration, development, operations, and exit phases of a project.

Resources

- Community and Stakeholder Assessment Template
- Environmental Justice Screens
- Community Engagement Plan Template

Figure 1 – Interactive Table of Contents

1 Scope

This document is designed to provide guidance to U.S. based upstream operators on how to assess, plan and implement effective and meaningful stakeholder engagement strategies that are aligned with community values and priorities. The recommended strategies encourage constructive conversation between operators and stakeholders to address concerns and develop mutually agreeable solutions.

2 Normative References

There are no normative references in this document.

3 Terms and Definitions

3.1

Climate and Economic Justice Screening Tool CEJST

A tool created by the Department of Environmental Quality to help Federal agencies identify Disadvantaged Communities.

3.2

community advisory panel CAP

A continuous, long term discussion forum for key stakeholders and operator representatives to create an open dialogue.

NOTE CAPs typically meet on a regular basis and discuss topics important to both the industry and local stakeholders.

3.3

community and stakeholder assessment

An assessment to help operators learn more about the communities and stakeholders in their operating area to plan more effective engagement.

3.4

community benefits agreement

a legal agreement between community benefit groups and developers, where a developer agrees to deliver certain benefits in exchange for community support of a project.

3.5

community engagement plan

A plan, based on the community and stakeholder assessment, to engage with communities and stakeholders.

3.6

decarbonization

Reduction or elimination of carbon dioxide emissions.

3.7

disadvantaged community

Communities that are marginalized, underserved, and overburdened by pollution; as identified by the White House Council on Environmental Quality's Climate and Economic Justice screening tool.

NOTE 1 See Executive Order (EO) 14008 on Tackling the Climate Crisis at Home and Abroad,

NOTE 2 A disadvantaged community meets the threshold for at least one designated category of burden and/or is on land within the boundary of a Federally Recognized Tribe.

3.8

Energy Justice Dashboard (BETA)

A data visualization tool developed by the Department of Energy that displays DOE-specific investments in communities experiencing disproportionately high and adverse economic, human health, climate-related, environmental, and other cumulative impacts.

3.9

environmental justice

EJ

The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

3.10

environmental justice community

A community that experiences significant environmental or social burdens.

NOTE An EJ community can be identified through an EJ mapping or screening tool, analyzing demographics, existence of tribal lands, or self-identification of a community as an environmental justice community.

3.11

environmental justice screening tool

A tool that utilizes demographic and environmental data to identify potential environmental justice communities, concerns, and impacts.

3.12

EJScreen

An environmental justice mapping and screening tool that provides EPA with a nationally consistent dataset and approach for combining environmental and demographic indicators.

3.13

fair treatment

The principle that no group of people, including a racial, ethnic or a socioeconomic group, should bear a disproportionate share of the negative environmental consequences from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.

NOTE In implementing its programs, EPA has expanded the concept of fair treatment to include not only consideration of how burdens are distributed across all populations, but the distribution of benefits as well.

3.14

indigenous peoples

Culturally distinct ethnic groups whose members are descended from the earliest known inhabitants of a geographic region and maintain the language and culture of those original peoples.

NOTE The term includes state-recognized tribes; indigenous and tribal community-based organizations; individual members of federally recognized tribes, including those living on a different reservation or living outside Indian country; individual members of state-recognized tribes; Native Hawaiians; Native Pacific Islanders; and individual Native Americans.

3.12

just transition

Framework to encompass social, political, and economic interventions needed to support workers' rights and livelihoods as economies shift to sustainable development.

3.15

Justice40

The Federal Government's goal that 40 percent of overall benefits from certain federal investments flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution.

NOTE See Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*.

3.16

low-income

Populations characterized by limited economic resources.

NOTE The U.S. Office of Management and Budget has designated the Census Bureau's annual poverty measure as the official metric for program planning and analysis, although other definitions exist.

3.17

marginalized populations

Communities confined to the lower or peripheral edge of society.

NOTE Such groups are denied involvement in mainstream economic, political, cultural, and social activities due to age, physical or mental disabilities, economic status, access to education, or geography.

3.18

meaningful involvement

Providing an opportunity for people to participate in decisions about activities that can affect their environment and/or health;

3.19

stakeholder

Any person, group or entity impacted by or with the ability to impact an organization and its activities is considered a stakeholder.

NOTE Stakeholders can affect or be affected by the organization's actions, objectives, and policies.

3.20

stakeholder engagement

The process used by an organization to engage relevant stakeholders to achieve accepted outcomes.

3.21

social justice

The fair treatment and equitable status of all individuals and social groups; social, political, and economic institutions, laws, or policies that collectively afford such fairness and equity, or other goals for currently or historically oppressed, exploited, or marginalized populations.

3.22

vulnerable population

A group of people who are at a disadvantage or greater risk due to a characteristic or status.

EXAMPLE Low-income communities.

4 Purpose of the Community Engagement Guidelines Document

4.1 General

4.1.1 This document is designed to acknowledge opportunities, challenges and potential impacts on a region or community during the lifecycle of an asset development. While many operators follow similar guidelines and procedures, this document provides recommendations to supplement existing practices and allows the development of flexible and adaptable engagement strategies. This document also highlights engagement strategies and tactics that operators have described as successful in engaging with stakeholders.

4.1.2 These guidelines provide recommendations to enable operators to satisfy their specific considerations to the best of their ability, given the unique situation of each project or asset, and the company and community involved.

4.1.3 This document provides non-technical guidance only, and practices included herein are not applicable in all regions or circumstances. This document does not constitute legal advice regarding compliance with legal requirements, contractual obligations, or risk mitigation. It is not intended to be all-inclusive. The operator is responsible for determining compliance with applicable legal and regulatory requirements.

4.2 Principles

4.2.1 General

Oil and natural gas operators acknowledge potential challenges associated with industry activities, and the potential impact these activities may have or be perceived to have on local communities. Principles of respect, integrity, safety and environmental stewardship, openness, and responsiveness to community concerns underpin responsible operations as shown in Figure 2. These core values lay the foundation of any good relationship.

Principles of Community Engagement



Figure 2 — Principles of Community Engagement

4.2.2 Respect

Operators treat landowners and stakeholders with respect because they value relationships within the communities. When working with landowners and stakeholders in project development, operators can demonstrate respect by being responsive through proactive communication and responsiveness; listening to understand stakeholders' perspectives, acknowledging their concerns, and being responsive to questions. Considering and respecting others' points of view are critical to establishing long-term relationships across the lifecycle of oil and natural gas development.

4.2.3 Integrity

Integrity forms the basis of trust, a foundational element for building relationships. Companies operating with integrity work to build and maintain positive, constructive, and trusting community relationships throughout the ~~construction and development~~ lifecycle of an asset. Companies can demonstrate integrity by identifying and operating in adherence to their moral and ethical principles. Throughout the project, they maintain their presence as leaders in the community with a reputation for forthright engagement on issues important to their stakeholders. Proactive, transparent engagement supports integrity.

4.2.4 Safety

The oil and natural gas industry is committed to safety and environmental protection, with an overarching goal of zero incidents. Companies are committed to safety and the protection of the public and the environment. The goal is to operate daily in a manner that protects the health and environment of communities, employees, and contractors throughout a project.

4.2.5 Environmental Responsibility

Climate change continues to be a focal point for communities across the globe. As the energy transition evolves, operators' external engagement strategies should seek to understand the point of view of stakeholders as states, counties and cities, build strategies for lowering emissions and addressing climate change impacts.

4.2.6 Transparent and Open, Responsive Communication

Proactive engagement and effective communication with the public forms a core element of an operator's management system. Public engagement processes can help manage risk and find mutually beneficial solutions. Operators should establish genuine public partnerships, maintain lines of communication with community leaders and service providers and establish mechanisms for engaging individual stakeholders as needed. Being authentic and forthcoming with stakeholders without overpromising can form the foundation for trust, credibility, and improved dialogue and understanding. Understanding, planning, and engaging is a three-phased approach to stakeholder communications that reflects a well-developed and effective strategy.

4.3 Plan-Do-Check-Act

4.3.1 Plan-Do-Check-Act (PDCA) is at the core of any management system. Operators developing community and stakeholder engagement plans also can use the PCDA model that is designed to encourage continuous improvement through a repetitive cycle (see Figure 3).

4.3.2 The PDCA includes creating strategies and plans; executing strategies and plans according to guidelines; checking actions for conformity; and using results to adjust the next generation of plans. Learning from experience and continuous improvement using PDCA are essential.

4.3.3 The Plan-Do-Check-Act cycle can be adapted to the community engagement process. The Community and Stakeholder Assessment (see Section 5) and Engagement Plans (see Section 6) comprise the Plan stage. After implementing planned community engagement activities, operators should Check that activities were effective and aligned with operator and community expectations. The Community and Stakeholder Assessment and Community Engagement Plan should be updated and adjusted as needed before additional engagement activities are undertaken.

4.3.4 Community engagement can lead to numerous iterations of the Plan-Do-Check-Act cycle. Through each step of oil and gas development (see the Five Phase Model in Section 8), operators should evaluate the success of their engagement and evaluate how to improve ~~with~~ community relationships and engagement techniques.



Figure 3 — PDCA Continuous Improvement Model

5 Community and Stakeholder Assessment

5.1 General

5.1.1 A community and stakeholder assessment will help guide the community engagement plan. This assessment will help in understanding the issues and needs uniquely related to the project area and influence engagement. The stakeholder assessment shall be completed before developing the plan.

5.1.2 Across the United States, and even within major resource regions, communities can vary drastically; therefore, it is important to assess the social, economic, political, and environmental landscape of the company's operating areas.

5.1.3 The goal of community assessments is to understand the dynamics of the region and its stakeholders for use in engagement planning. Knowledge and understanding of the landscape and community concerns are important when determining project location, route, and impact mitigation efforts.

5.1.4 An effective community assessment can help operators understand the communities in which they work, informing:

- a) priority stakeholder lists;
- b) vulnerable populations;
- c) disadvantaged communities;
- d) effective means of reaching stakeholders (including language and accessibility considerations);
- e) potential opportunities, concerns, and issues; and,
- f) ways to invest meaningfully in communities.

5.1.5 Public impressions of infrastructure projects come from politics, economics, demographics, experience, and history. The community and stakeholder assessment should help identify challenges and opportunities. Challenges can include hesitation or resistance towards new development, prior negative experiences with development or environmental issues, and regional environmental sensitivities. Opportunities can include interest in the project or regional development or opportunities to build community educational or training programs. Challenges and opportunities are unique to each community and are not limited to known challenges or suggested opportunities in this document or the company's prior experiences.

5.2 Learning about Stakeholders

5.2.1 General

Each community has unique needs based on a variety of factors, including demographics, geographical landscape and ecosystems, civic and political views, and media use. As shown in Figure 4, determining the needs of a community and its members will require an understanding of the demographics, leaders, and other influencers within and proximal to the community, and local priorities.

Learning about your Stakeholders



Figure 4 — Stakeholder Learning

5.2.2 Understand Political and Geographical Boundaries

Understanding political and geographical boundaries along the project route is essential in developing an effective engagement plan. Every district has government boundaries, such as boroughs, townships, wards, and/or precincts. Each district also has geographical boundaries, such as neighborhoods, cities, towns, parishes, and counties. Seek local leaders within the appropriate boundaries and organizations who can provide insight to help the company understand the communities, identify other stakeholders, and help communicate with the public. Any tribal groups or lands should also be noted.

5.2.3 Identifying Known Community Events

Throughout the year, most communities have events, such as summer festivals, concert series, farmers markets, parades, picnics, science fairs, career fairs, and more. Additionally, many local businesses host events, such as monthly luncheons or seminars, which serve as a place to interact with business and civic leaders. Companies may choose to participate in these types of events to maximize their opportunities to engage with local individuals and to enhance understanding between the community and the company. Involvement in the community should be well planned; the intentions to benefit the community should be

communicated efficiently; and the company should plan to adapt the level and type of involvement as needed throughout the lifecycle of the project.

5.2.4 Diversify Outreach and Promote Equity

In stakeholder outreach and ongoing dialogues, engage individuals and groups representing diverse viewpoints and community experiences. Representation can mean involving stakeholders of varying ages, races, disabilities, gender, ethnicity, income, education, language, and geographical location. As you learn about your stakeholders, consider how you can diversify your outreach efforts to meet stakeholders where they are. Consider if your stakeholders will need additional outreach efforts to allow for equity in communications, such as translating content to accommodate language proficiency, as well as materials for those who have visual and/or hearing impairment.

5.2.5 Environmental and Social Justice

Environmental and social justice principles are increasingly important to communities historically underserved or overburdened. Environmental justice continues to be an increasingly important consideration for many stakeholders and operators in the development of natural resources.

When completing a community assessment, an operator should seek to understand any existing or potential environmental justice communities in the area, or social justice needs through a fit-for-purpose environmental justice screening ([see Figure 5](#)). For more information on environmental justice screening, see 5.5.3.

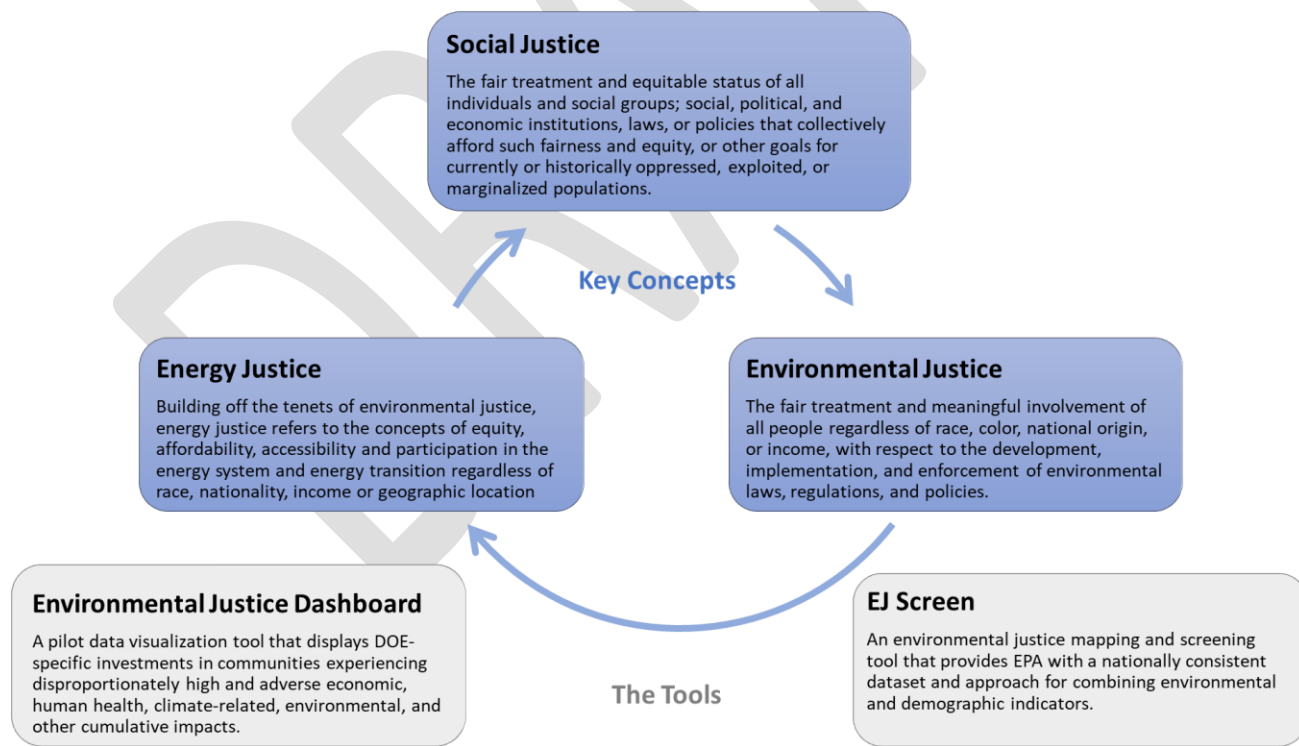


Figure 5 – Community Assessment Key Concepts

5.2.6 Economic Impacts

5.2.6.1 An economic impact assessment may be considered in addition to or as part of the Community and Stakeholder Assessment process. Operators should work to assess how any proposed developments may impact local economies include potential jobs, income and benefits, and impacts or benefits to other businesses, contractors, and suppliers. Direct and indirect impacts may be considered.

5.2.6.2 As part of the stakeholder assessment, operators can also seek to understand microeconomic characteristics of local communities such as median wages, typical benefits, median family income, poverty rates, educational attainment, and the most common industries/largest employers in the area. Understanding the economic concerns of stakeholders as well as the potential impacts and benefits of development can be an important part of planning communications and potential investments.

5.3 Stakeholder Mapping

5.3.1 Stakeholder mapping is a process of learning about engagement needs and influence of key stakeholders within communities in the operating area. This can include investigating demographic and environmental maps, desktop research on key organizations and leaders, as well as on-the-ground research of the immediate project area. This process can include meeting landowners and near-neighbors, and other key stakeholders during the assessment.

5.3.2 Tools such as U.S. Census Data and the EPA's EJSCREEN can help project teams learn more about the demographics of the area and identify potential language barriers and/or underserved or overburdened communities near the project area.

5.3.3 Desktop research can identify stakeholders such as local environmental, historical, or cultural groups; civic and community organizations; local elected officials and other leaders; and organizations or local businesses for potential outreach and partnerships (see Figure 6).

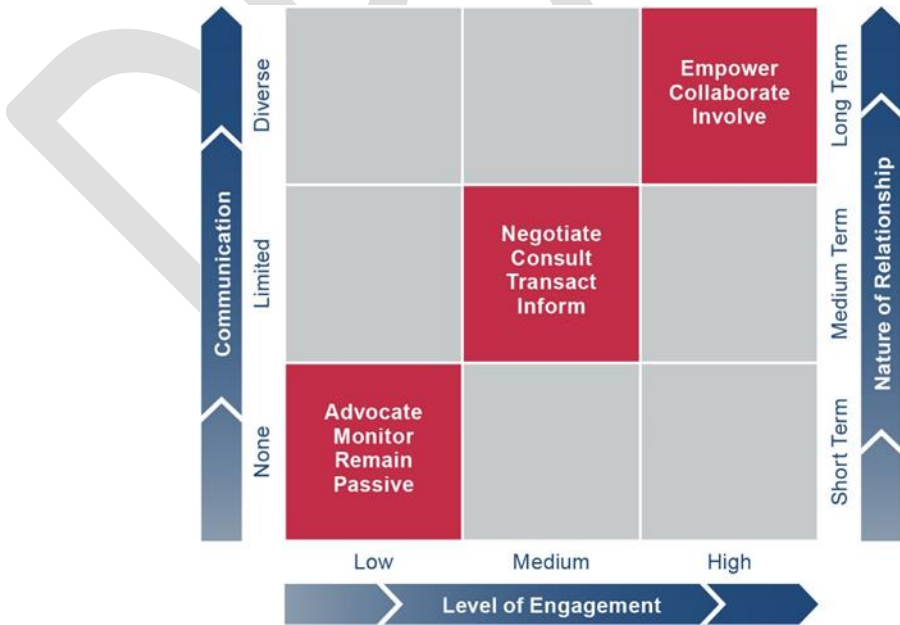


Figure 6 — Engagement Matrix

5.4 Key Stakeholder Groups

5.4.1 Key stakeholder groups should be included during the stakeholder mapping process. These groups can often influence public opinion related to a project, help connect the company to other stakeholders within the community, require additional outreach, or present opportunities for community engagement or investment. Key stakeholders can include but are not limited to the following:

- a) federal, state, local elected and appointed officials;
- b) first responders;
- c) indigenous peoples and cultural groups;
- d) environmental and conservation groups;
- e) environmental justice community leaders;
- f) human rights advocates;
- g) contractors, suppliers, and other potential business partners;
- h) schools and higher education, particularly related to vocational training and science, technology, engineering, and mathematics (STEM), school superintendents, school board members;
- i) religious organizations and places of worship;
- j) civic and business organizations;
- k) homeowner's associations.

5.4.2 Groups like chambers of commerce and homeowners' associations provide an existing liaison structure between local governments and individual stakeholders. Environmental justice communities may require additional outreach, and leaders in these communities can help ensure the outreach reaches stakeholders. Outreach to potential business partners and potential community investment partners, such as schools, educational groups, or local charities, can build relationships for future investment.

5.5 Community Associations Based on Shared Cultural, Language, or National Origin Affinity

5.5.1 General

5.5.1.1 To provide fair and meaningful involvement, operators should conduct additional outreach in communities with known or potential environmental or social justice concerns to mitigate impacts. Environmental justice communities can include those with significant environmental or climate burdens, poor health, food insecurity, large population of low-income or minority residents, predominantly non-English speaking residents and/or those with legacy brownfield or contaminated sites, as well as those that self-identify as environmental justice communities. The public's contribution can influence the regulatory agency's decision; community concerns will be considered in the decision-making process; and decision makers can seek out and facilitate the involvement of those potentially affected.

5.5.1.2 Not all communities that are vulnerable or disadvantaged will appear on environmental justice screening tools. Operators should consider demographic results from the U.S. Census or other reporting measures (for example, unemployment statistics), as well as desktop and on-the-ground research to understand the known and potential risks communities face. Greater clarity on environmental justice areas can be gained by leveraging various environmental justice screening tools. Depending on the burdens a community faces and their unique characteristics, additional planning may be needed to help ensure fair and meaningful engagement.

5.5.2 Understanding Local Customs

5.5.2.1 When entering and engaging with a community, it is important to understand local customs and identify potential sensitivities. Understanding other cultures and customs is a vital part of respectful and meaningful communication that can help build trust and respect between stakeholders and operators. Be sure to design any outreach plans, studies, or risk analyses with the local culture in mind.

5.5.2.2 Consider conducting training for all project members working in a new community to help ensure the project team understands local customs and communication styles. Having a dedicated community liaison can also help project teams learn more about the project area and how to best approach stakeholders.

5.5.2.3 By engaging with stakeholders in ways that are meaningful to them, operators can gain better insight into the community as well.

EXAMPLE One operator found that in Indigenous groups in Alaska, respect for elders is a very important value. Communications teams recognized that younger generations can be less comfortable sharing their opinions in a group with elders to avoid being disrespectful, and that this cultural expectation can impact the results of focus groups. By understanding local expectations, the communications teams can plan their engagement accordingly.

5.5.3 Environmental Justice Mapping

5.5.3.1 Along with stakeholder identification, environmental justice mapping and screening can help operators understand the local communities in their operating areas through demographic, socioeconomic, and environmental indicators. Understandings of environmental justice are continually changing. Operators should ~~take care to~~ learn about the most recent environmental justice definitions, mapping tools, and resources available for projects in their operating area.

5.5.3.2 A thorough assessment of the project area can help operators understand their stakeholders; identify existing or potential overburdened communities; tailor outreach to meet stakeholders' needs and avoid communication barriers; and begin to align community investment with local needs.

5.5.3.3 There are several ways to identify environmental justice communities and potential environmental justice concerns. Operators can use Census data to better understand local demographics and socioeconomic factors such as age, race, ethnicity, income, education, employment, and housing that may indicate a vulnerable community. Additionally, environmental justice screening tools can be used to identify environmental justice communities and local environmental concerns.

5.5.3.4 In addition to using online data sources for environmental justice mapping, operators should use local knowledge and on-the-ground research in the community to further understand environmental justice concerns, as needed.

5.5.3.5 As of 2023, options for environmental justice mapping include nationwide, state-, and city-specific tools. Nationwide environmental justice mapping options include the EPA's EJScreen, the Council on Environmental Quality (CEQ) Climate and Economic Justice Screening Tool (CEJST), and the Department of Energy Justice Dashboard (note: this tool is still in under beta launch). The Table 1 below provides summary

information on the EJScreen, CEJST, and Energy Justice Dashboard. See Annex A for a list of state and city tools.

5.5.3.6 Priority of use should be determined by project locale and agency involvement.

NOTE EJ mapping tools can present varying results for the same localities based on what criteria are analyzed and how thresholds are defined.

5.5.4 Environmental Justice Outreach

After identifying potential environmental justice communities, it is important to ensure that any community engagement plans incorporate considerations, as needed, to ensure meaningful engagement. Depending on the sensitivities related to local populations, additional outreach strategies can include:

- a) translating project materials and providing language interpretation at all events and meetings;
- b) hosting meetings at varying times or virtually to accommodate schedules;
- c) consider potential barriers to participation, e.g., transportation access, childcare, accessibility;
- d) meeting stakeholders face-to-face, particularly in areas with limited internet connection or proficiency; and,
- e) working to align community giving with local needs.

Table 1 – U.S. Environmental Justice Screening Tools

Tool	Summary	Summary of Data Used
EJScreen Environmental Protection Agency	<p>Utilizes environmental and socioeconomic data to calculate 12 EJ Index scores, along with supplemental indexes. Operators can select specific areas including County, City, Tract, and/or Block Group and create standard reports. Standard EJScreen reports display data as percentiles as compared to the U.S. and State to show the results in context.</p> <p>EJ Indexes are disaggregated by socioeconomic and environmental indicators; therefore, results can be understood by both the exact value and the percentile within the State and U.S. Thus, these reports reflect a broad, comprehensive view of what environmental and socioeconomic factors are affecting communities and offers several data interpretations to ensure operators can see different ways communities can be affected by specific burdens.</p>	<p>The 12 EJ index and supplemental index names are:</p> <ul style="list-style-type: none"> — particulate matter 2.5; — ozone; diesel particulate matter; air toxics cancer risk; — air toxics respiratory hazard index; — traffic proximity; lead paint; RMP facility proximity; hazardous waste proximity; — superfund proximity; underground storage tanks; and wastewater discharge. <p>Demographic data is pulled from the U.S. Census Bureau and includes the</p> <ul style="list-style-type: none"> — demographic index, — people of color, — low income, — unemployment rate, — limited English speaking, — less than high school education, — under the age of 5, and — over the age of 64.
Climate and Economic Justice Screening Tool Council on Environmental Quality	<p>Released in 2022 to help federal agencies identify disadvantaged communities that can benefit from programs included in the Justice40 initiative by providing a uniform definition of disadvantaged communities for Federal Agencies.</p> <p>The tool classifies communities as “disadvantaged”, ‘partially disadvantaged,’ or ‘not disadvantaged’ based on burden thresholds in eight categories. The tool uses census tracts with populations between 1,200 and 8,000 people. While race and ethnicity data can be reviewed alongside the tool’s results, race and ethnicity data is not included in calculating disadvantage.</p>	<p>The CEJS tool has an interactive map and uses indicators of burdens in eight categories:</p> <ul style="list-style-type: none"> — climate change, — energy, — health, — housing, — legacy pollution, — transportation, — water and wastewater, and — workforce development. <p>Federally recognized tribal lands are considered.</p>
Energy Justice Dashboard (BETA) Department of Energy	<p>A pilot data visualization tool that displays DOE-specific investments in communities experiencing disproportionately high and adverse economic, human health, climate-related, environmental, and other cumulative impacts.</p>	<p>Utilizes environmental indicators from the EJScreen tool to show socioeconomic and environmental impacts, as well as energy burden using data from the from DOE’s Low-Income Energy Affordability Data (LEAD) Tool.</p>

5.6 Indigenous Engagement

5.6.1 General

5.6.1.1 Indigenous engagement is about going beyond any regulatory checkbox of tribal consultation under regulatory drivers within the U.S. and engaging in meaningful discussions. With the U.S., there are 574 federally recognized American Indian and Alaska Native tribes and Native Hawaiian Organizations residing in 34 states. Each of those Tribes is recognized by the federal government as having sovereign nation status, an important political designation that ensures that decisions by Federal Agencies impacting Tribal peoples must be made after consultation with those nations. Additionally, there are state recognized tribes, which are Indian tribes and heritage groups recognized by individual states. For purposes of indigenous engagement, we are referring to both federally and state recognized tribes collectively as “Tribes” in this section.

5.6.1.2 Due to forced migrations and normal migrations over time, Tribes can be located at great distances from original ancestral lands and their historic ties to the land should be acknowledged and taken into consideration. Respect tribal sovereignty by engaging Tribal Nations to ensure engagement. Confidentiality and respect are critical elements of consultation, and data from tribal members managed to protect confidentiality and demonstrate respect for applicable customs, cultural expectations, and laws.

Resources to help identify potentially affected Tribes in the U.S. are shown in Table 2.

Table 2 — Resources for Tribal Information

Entity	Website Link
Advisory Council on Historic Preservation	Other Tribal Consultation Resources Advisory Council on Historic Preservation (achp.gov)
Bureau of Indian Affairs	Tribal Leaders Directory Indian Affairs (bia.gov)
Library of Congress Indian Land Cessions	Indian Land Cessions: U.S. Congressional Documents (loc.gov)
Housing and Urban Development	Tribal Directory Assessment Tool (TDAT) (hud.gov)
National Association of Tribal Historic Preservation Officers (NATHPO)	Directory GZ Directory Map - NATHPO
National Conference of State Legislatures – State Recognition of American Indian Tribes <i>In addition to the State Legislative Committees Dedicated to Indian Affairs, the webpage also includes list State Executive Branch Indian Affairs Commission or Contacts</i>	State Committees and Commissions on Indian Affairs (ncsl.org)
National Congress of American Indians	Tribes NCAI
National Park Service–Native American Graves Protection and Repatriation Act (NAGPRA)	Contacts (nps.gov)
National Park Service – Tribal Preservation Program	State, Tribal, and Local Plans & Grants (nps.gov)
U.S Department of Justice – Office of Tribal Justice	Office of Tribal Justice Consultation Policies
U.S. Department of the Interior – Indian Affairs	Tribal Leaders Directory Indian Affairs (bia.gov)
U.S. Forest Service	Tribal Connections (arcgis.com)
State Historic Preservation Office (SHPO) <i>Tribal information varies by state</i>	Directory NCSHPO

5.6.1.3 The following are additional considerations for Tribal engagement.

- a) Early/pre-decisional engagement is paramount.
- b) Do not wait for finalized siting/plans, engagement to have conversations around significant resources and avoidance, minimization, and mitigation of potential impacts.
- c) Working groups should include Tribal leaders and community members.
- d) Consider different positions of Tribes, individuals, intertribal organizations, and urban/non-reservation-based, as appropriate.
- e) Outline specific methods for engaging with Tribes and disseminating information including the types of engagements and the frequency.
- f) Develop a robust communications approach - consider access to internet, newspapers, post offices, and other means of communication.
- g) Provide detailed and clear information about the project(s) for which the company is seeking input.
- h) Use plain language and terminology.
- i) Give adequate time for Tribal leaders to discuss relevant issues with their technical advisors and community members.
- j) Encourage Tribal participation in governance bodies/groups.
- k) Respectfully manage data access/categorization: public vs. controlled.
- l) Ensure commitments made are honored (i.e., if monitoring is requested during ground disturbing activities make sure there is a process to inform the construction crew, foreman, etc. of this request and requirements, as well as how the company will inform the Tribe prior to the start date, during, and at the completion of said activities).
 - Provide information and create awareness around Emergency Management and Safety practices.
 - Identify opportunities for contracting, employment, job training.

5.6.2 Free, Prior, and Informed Consent

An additional consideration for Tribal engagement is the principle of Free, Prior, and Informed Consent (FPIC). The United Nations Declaration on the Rights of Indigenous People (UNDRIP), which includes the principle of Free, Prior, and Informed Consent (FPIC) allows Indigenous Peoples to give or withhold consent to a project that may affect them or their territories. Though the U.S. has not officially adopted UNDRIP, some States, organizations, and US corporations have adopted elements of UNDRIP and FPIC into their policies and practices. FPIC enables Indigenous People to be part of the discussion and negotiations around the conditions under which the project will be designed, implemented, monitored, and evaluated. The outcome of FPIC is a consultation process written agreement that documents the agreement process and which can include outcomes, outcomes (what was and was not agreed to), and may include such as written agreements on communications arrangements, feedback and complaints mechanisms, monitoring and evaluations plans, and terms of withdrawal of consent.

6 Community Engagement Plan and Taking Action

6.1 General

Use the Community Engagement Plan to guide engagement with the local community, to include leaders, neighbors, support, and opposition. Effective stakeholder and community engagement requires sustained, meaningful engagement with individuals, groups, and leaders in the community.

6.2 Determine Community Engagement Activities and Strategies

6.2.1 Utilize knowledge of the project, project area, and stakeholders to develop a Community Engagement Plan that

- a) notifies key stakeholders and the broader community at the appropriate time,
- b) ensures project information is available to and accessible by interested stakeholders,
- c) offers appropriate formats for feedback and grievance reporting, and
- d) demonstrates that stakeholder feedback and concerns are valued and understood by the project team, and that mitigation efforts are undertaken where possible.

6.2.2 The most effective means of communication and feedback or grievance mechanisms can vary by community, while the timeline for outreach can also vary by project. Therefore, it is important to note that Community Engagement Plans are not a one-size-fits-all model.

6.3 Building Trust

6.3.1 General

6.3.1.1 Both operators and stakeholders have noted that early and consistent communication can set up operators and communities for long-term, successful partnerships. Informing-Engaging stakeholders in the early stages of project development, identifying key community partners, and being consistent in all communications and engagements can go a long way in building trust with stakeholders.

6.3.1.2 Operators have noted that building relationships has been key to successful community engagement. Strategies for fostering relationships include the following:

- a) identification of key contacts during stakeholder mapping;
- b) early outreach to key stakeholders;
- c) consistency and transparency, as able, in sharing project information with stakeholders;
- d) contact with consistent members of the project team, potentially through a community liaison or other established point of contact;
- e) listening to stakeholder concerns and responding or mitigating where possible;
- f) investing in the community based on local needs and input;
- g) learning about past experiences with developers and development to understand legacy successes and disappointments; and,

- h) sustaining consistent communication, representation and involvement with the community throughout the project lifecycle.

6.3.1.3 Strong relationships can benefit operators by enabling team members to learn more about the area, identify potential issues before they arise, and increase public knowledge and support of the industry. These relationships can be an important asset to future development. Some operators or projects can benefit from a dedicated community liaison.

6.3.2 Treating Stakeholders with Respect

Treating stakeholders with respect is an important part of building community trust. Strategies for demonstrating respect include:

- a) providing open and honest communications;
- b) learning about and respecting local customs;
- c) being mindful of stakeholder time commitments;
- d) asking open ended questions and demonstrating active listening to stakeholder concerns; and,
- e) implementing changes based on stakeholder feedback where possible.

EXAMPLE A group in Alaska expressed experiencing “interview fatigue” due to frequent interviews from various groups without seeing the results of the studies in which they were participants. A local operator engaged community experts in an impact study, then shared the results of their study with the community at the local career and science fair. The community expressed their appreciation for seeing the results.

6.4 Initial Project Outreach

While each operator determines when outreach for a particular project will begin, early engagement with notification to stakeholders is vital. Operators should consider what meaningful engagement looks like for various stakeholder groups. For example, determine how wide of an area should receive project notifications, ? Which stakeholder groups should be engaged first, and ? What are likely to be the most effective means of engaging each group?

6.5 Who, What, When

6.5.1 Deciding who to engage, when to engage them, and in what ways, should structure the community engagement plan. Operators should use stakeholder mapping to assist with the following:

- a) identifying which stakeholders should be notified and/or engaged early in the project;
- b) determining the most effective methods of engagement;
- c) how frequently stakeholders should be engaged.

6.5.2 In designing the community engagement plan, it is important to devise a communication strategy that addresses the community, cultural, economic, and environmental context where a project occurs, and that considers the values and beliefs of local stakeholders, and the way in which they live and interact with each other.

6.6 Project Information

Operators should provide information about their project development as soon as appropriate to help inform stakeholders on potential benefits to the community, potential short-term inconveniences and long-term impacts, development, and execution. Careful consideration should be given to the appropriate project information, key messaging as well as the method for communication depending on the stakeholder group. Many stakeholders do not have technical expertise related to the industry: it is important to provide communications that are understandable for a non-technical audience.

6.7 Potential Methods for Communication

6.7.1 In-person Events

Large community events, such as open houses, town hall meetings, and/or public information sessions, can reach large numbers of interested community members (see Figure 7). A combination of local calendars and research should be used to schedule opportunities to target your message to the appropriate audience. Companies can also take advantage of local business groups' regularly scheduled luncheons or meetings as another opportunity for presenting your project. A company can start holding local events as soon as they are prepared to talk about the project, since it is an efficient way to meet community members and other stakeholders who may not have been accounted for in earlier stakeholder mapping. Events are also a reliable way to demonstrate that the company is prepared to be a community partner.



Figure 7 — Engagement Communication Methods

6.7.2 Virtual Events

Virtual events are a great alternative or can supplement in-person events and can be more accessible under certain circumstances. For example, if the project area is extraordinarily broad or difficult to travel, is prone to extreme weather, or there are other health or safety concerns.

6.7.3 Digital Media

Stakeholders increasingly expect project information to be easily accessible online. Offer basic project information and education materials through a dedicated project webpage, and/or share information on social media, email programs, and digital advertising.

6.7.4 Earned Media

Earned media (e.g., blogs, social media, and publications) are great ways to be proactive and provide information to local media for future coverage.

6.7.5 Direct Mail

Direct mail is best used in communities where residents may not have widespread access to the internet or to a broadband connection. It is often used for public awareness.

6.7.6 Newsletters

The issuance of periodic newsletters demonstrates long-standing community commitments and regularly informs stakeholders about company operations. Operators can share stories related to company updates, new technologies, industry safety, general community, community involvement or volunteerism, and local interest stories. Newsletters can be distributed by mail, email, or website.

An operator issued a regional newsletter with stakeholders for many years. Frequent topics included:

- a) new technologies, like drones to detect and quantify emissions;
- b) partnerships with local organizations to promote safety;
- c) employee spotlights;
- d) local emergency response training;
- e) community advisory committee updates; and,
- f) contact information for the stakeholder relations team.

Newsletters can be shared with stakeholders through mail or email, depending on the best way to reach stakeholders in the company's operating area.

6.7.7 Reporting and Disclosures

Sharing existing reports and disclosures with stakeholders is another way to demonstrate transparency and share updates related to company operations. Reporting examples might include annual reports, sustainability reports, and impact reports.

6.7.8 Door-to-door Engagement

Some projects, especially those with very close neighbors, can benefit from door-to-door engagement with project representatives, which can demonstrate commitment from the project team and ensure near-neighbors are receiving project communications.

6.7.9 Small Group Meetings

6.7.9.1 General

Small group meetings are a great opportunity to build trust with key stakeholders. Groups to consider can include local officials, interest groups, or homeowners' associations. Some companies may find a community advisory panel (CAP), comprised of key stakeholders as a useful way to ensure long-term, meaningful engagement.

6.7.9.2 Community Advisory Panels

6.7.9.2.1 Some operators utilize small group meetings, often in the form of a CAP, to engage in meaningful dialogue with stakeholders representing diverse interests. Meeting with a small group of key stakeholders on a regular basis can promote meaningful engagement, support continued education related to the industry, and offer a forum to discuss and mitigate stakeholder concerns.

6.7.9.2.2 CAPs can be customized to fit the needs of each operator and/or region. Stakeholders to engage can include business leaders, first responders, representatives from local organizations, educators, faith-based leaders, tribal nations, NGOs, homeowners' associations, and other key groups.

6.7.9.2.3 Some operators have established CAPs at all facilities. Community volunteers exchange ideas about the company's presence, operations and initiatives, and address community concerns.

6.7.9.2.4 One such CAP is comprised of community members from multiple counties and an operator's employees. The CAP meets quarterly to discuss important industry and community topics including operations, environmental concerns, safety practices, emergency preparedness, and community involvement.

6.7.9.2.5 The CAP helps the company understand the thoroughness and effectiveness of stakeholder engagement, ensures the company is listening to stakeholder concerns, and provides insight into public opinion.

6.8 Making Engagement Accessible

6.8.1 General

6.8.1.1 Opportunities for engagement should be widely accessible to the community or the engagement plan should be adjusted to allow further opportunities based on community needs.

6.8.1.2 For in-person meetings, accessibility can mean hosting events in a central location with access to public transportation; accessible entrances, seating, and restrooms; hosting meetings at convenient and/or varied times to accommodate busy schedules; and providing language translation as needed.

6.8.1.3 Virtual meetings and dedicated project websites are also strong opportunities to provide stakeholder information in accessible ways.

6.8.2 Providing Language Accessibility

6.8.2.1 During stakeholder mapping, any areas with a significant population that speak languages other than English should be identified. Operators should work to address potential language barriers and accommodate stakeholders who may need or prefer communications in languages spoken other than English.

6.8.2.2 During virtual or in-person meetings, operators should make language interpretation available for stakeholders by providing language interpreters. Operators can also consider whether to bring a translator to door-to-door or to one-on-one meetings when entering a new community where operators are unfamiliar with local demographics.

6.8.2.3 Project materials can also be translated into any languages spoken within the project area. It is important to remember that some project information can be complicated or contain technical language. Providing materials in a stakeholder's preferred language can facilitate a better understanding of project materials.

6.9 Engagement Teams and Consistent Messaging

6.9.1 Most operators would benefit from a dedicated communications or stakeholder team. However, engagement professionals are not the only company representatives who may have contact with stakeholders. It is important for all project team members such as land representatives, project managers, operations, and subject matter experts to have consistent, up-to-date messaging and project information.

6.9.2 Teams should also agree on who should be the primary contact for various stakeholders and how to contact (phone, text, email). Determine who should be the primary contact for individual resource owners; local officials; media; and community interest groups.

6.9.3 Consistent contact and messaging are vital for building trust with stakeholders.

6.10 Rapid Response Plan

6.10.1 A rapid response plan provides the ability to act with agility, take advantage of breaking news, and to be prepared to respond quickly during an unexpected crisis.

6.10.2 When it comes to safety and protecting the public, local and state first responders are important partners and shall be a part of the engagement plan. Being prepared and ready to respond in the event of an unlikely incident requires outreach and coordinated planning through participation in drills and exercises. The stronger the relationship, the better the preparedness, which benefits the entire community.

6.10.3 Emergency preparedness and response processes should

- be specific to the different kinds of accidents and emergencies that may occur, and
- specify training requirements, roles and responsibilities, provision of equipment and resources, and communication plans with potentially impacted workers, communities, and individuals.

6.10.4 Emergency Communication Plans should consist of the following.

- a) Be developed in consultation with potentially affected stakeholders, local communities, and authorities.
- b) Identify all affected stakeholders that will be informed of emergencies.
- c) Prescribe use of an internal chain of command or communications tree to ensure information flows through the appropriate channels.
- d) Include media response protocol.
- e) Confirm that communication regarding emergencies will be issued to affected stakeholders immediately after the incident has been detected.
- f) Specify that the communication will contain the type and potential impact of the emergency, what the operator will do to minimize impact, what affected stakeholders can do to minimize impact, and who to contact for any emergency-related inquiries.

- g) Prescribe that the operator will issue regular updates on impacts and remediation action to affected stakeholders.
- h) Outline how to coordinate with emergency services.
- i) Describe how the operator will respond to inquiries in a timely manner; Operator's Public Information Officer/Liaison Officer/Incident Command Chief.

6.11 Community Investment

6.11.1 Many operators invest in local communities as part of their engagement plans and commitments to stakeholders. Philanthropic giving, community events, and employee volunteerism present opportunities to demonstrate a commitment to local communities.

6.11.2 While operators often have targeted areas of giving such as STEM education or the environment, it is also important to align local investments with the needs of the community. Existing stakeholder relationships built through community engagement practices can help inform operators of the best opportunities for giving back. Operators should consult with local leaders and stakeholders, where possible, to gain insight into where community giving would be most meaningful. Community investment initiatives should

- a) relate investment to company's mission and values,
- b) understand community needs, and
- c) connect giving to community and stakeholder research findings (e.g., results from environmental justice screening and U.S. Census Data).

6.12 Employees as Ambassadors

Employees are a part of the fabric of the communities where they live and work. In areas with significant operations, employees are often ambassadors of the industry in conversation with friends, families, neighbors, and business partners in the area. Operators can consider providing employees in all subject matters with brief guidance on how to talk about their careers in the industry and operators' commitments to the environment and the community.

6.13 Community Benefits Agreements

6.13.1 Community Benefits Agreements (CBA) are a legal agreement between community benefit groups and developers, where a developer agrees to deliver certain benefits in exchange for community support of a project. As an enforceable, legally-binding contract, CBAs help build sustained benefits for communities that host development and infrastructure projects by stipulating how benefits will flow to local communities.

6.13.2 Community benefit groups may include a variety of stakeholders such as neighborhood associations, unions, environmental groups, and other groups or coalitions that represent the interests of stakeholders impacted by a proposed project. The results of the Community and Stakeholder Assessment can help operators identify groups and individuals to include as part of the community benefit group and help identify the range of stakeholder interests in the project area.

6.13.3 Because CBAs require collective action, the process of developing an agreement can enhance communication and help position stakeholders and operators for success. The CBA process can engender increased stakeholder interest and help facilitate increased participation in regulatory processes. The details of how benefits will flow to impacted communities provides a chance to build trust and support for a project, which may increase the probability of state or local government approval.

6.13.4 Potential benefits for operators include community agreement to support a project through public testimony and/or written statements; reduced risk by proactively gathering community support; and potential increased chance of receiving state or local subsidies or approvals. Potential benefits for communities include local hiring commitments; wage and benefit commitments; educational partnerships; and support for local business, industry, and suppliers.

6.13.5 CBAs are negotiated between community benefits group leaders and operators prior to project approval. The U.S. Department of Energy (DOE) suggests that “Community benefit strategies are most effective when a state or local government is participating in the development, providing a public subsidy in the form of a land-lease/land-use approval, or offering financial incentives for the project.” As such, the CBA process should begin while the project is under development and before land-use negotiations take place. The DOE provides further context for how CBAs can be negotiated in an [energy development context](#).

6.13.6 CBAs often include monitoring mechanisms to ensure community expectations and operator performance goals are met. As such, CBAs may describe operator deliverables, reporting requirements and report accessibility, how compliance is determined, and how noncompliance would be addressed.

7 Continuous Improvement Through Plan-Do-Check-Act

7.1 General

7.1.1 The Community and Stakeholder Assessment and Community Engagement Plan structure the Plan and Do portions of the Plan-Do-Check-Act cycle. After implementing planned community engagement activities, operators should Check that activities were effective and aligned with operator and community expectations. The Community and Stakeholder Assessment and Community Engagement Plan should be updated and adjusted as needed before additional engagement activities are undertaken.

7.1.2 Collecting input and assessing concerns is a vital part of checking the success of engagement activities ~~and assessing gaps and opportunities for future engagement~~. This process should be iterative, and evaluate the quality of engagement, as well as assess for gaps and opportunities for future engagement.

7.2 Collecting Input and Assessing Concerns

Listening and responding to stakeholder concerns is a vital part of building trust with communities. As part of the communication plan, it is important to establish a process to solicit, track, assess, and, where applicable, respond to stakeholder concerns. To promote accessibility, operators can consider establishing multiple feedback channels such as a toll-free phone line, email, website, and/or contact information for a local representative or stakeholder/communications team.

7.3 Complaint/Grievance Mechanism

7.3.1 Promoting channels for stakeholder feedback and responding to concerns is essential to meaningful engagement. Processes that allow concerns to be raised and remedied are often known as grievance mechanisms (see Figure 8). Ipieca, a global [oil and gas industry association](#) for [environmental](#) and [social issues](#), provides a Community Grievance Mechanism Toolbox. As stated in the Toolbox, grievance mechanisms “offer the prospect of a more efficient, immediate and inexpensive form of dispute resolution for both companies and communities.”



Figure 8 — Grievance Mechanism Process

7.3.2 When using a grievance mechanism, it is important to track feedback, respond promptly, and analyze records to inform future strategies. Considerations for tracking feedback includes:

- a) Collecting feedback from communities in a standardized and trackable format. Track emerging topics, issues, and potential risks.
- b) Keeping a record of individual and group engagement. This can include public meeting or open house summary reports; virtual meeting recordings; date, time, attendees, and major topics of individual or small group meetings. Track the number of meeting requests, team responses, and stakeholder-team meetings.
- c) Utilizing statistics from tracked feedback and engagements to inform business strategy around issues important to the communities. Government agencies may also request inquiry and response management details.

7.3.3 [Ipieca's Community Grievance Mechanism Toolkit](#) offers a how-to guide, procedure templates, assessment and diagnostic tools, and grievance register tools for further information on designing and implementing a Grievance Mechanism.

7.4 Sustained Engagement & Sharing Success

7.4.1 Many operators already have a positive story to tell about community partnerships. They offer local scholarships, charitable giving programs, and educational support. Spotlighting these community investments can communicate potential community-level benefits to stakeholders and demonstrate the level of commitment of the company. Recipients of community support programs are the ideal representatives to explain how industry benefits the community in the short and long term.

7.4.2 In 2022, API spoke with representatives from communities with significant oil and natural gas development. Findings from these discussions are highlighted as follows.

a) Southwestern Pennsylvania

- Community leaders emphasized that strong early efforts to inform communities about oil and natural gas operations and promote industry safety practices have helped set operators up for success.
- Operators have become engrained in the community as corporate citizens. Routine events, such as volunteering or giving, are noticed and appreciated.
- Community leaders notice small, daily engagement that occurs through employees living and working in the area. Friends and neighbors discuss their jobs and industry presence in the region, and operators become recognized as part of the community.
- Community leaders that have familiarity with the industry appears to occur on a grassroots level, with near neighbors having the most positive view of the industry and safety. Across the larger region, people may be skeptical or oppositional where little to no oil and gas development has occurred as they are less familiar with the industry, operators, and community benefits.
- Local leaders are impressed with the variety and diversity of jobs related to the industry that are now available to community members.

b) Southeastern New Mexico

- Local governments are working on ways to demonstrate the benefits of oil and natural gas development. Operators can offer resources to municipalities or local leaders to help get messaging across to constituents.
- Local leadership suggested that partnership between communities and stakeholders is important in determining where investments should be directed.
- Relationship building is important for helping both operators and municipalities recognize and manage impacts. For example, some roads with heavy oil and natural gas traffic are owned by the state, while others are owned by counties. As county roads deteriorated from additional use, local leaders had to determine how to approach operators to discuss how to mitigate impacts. Having strong relationships with local leadership allows operators to bring issues to local leadership attention, while local leaders can also advocate for local needs to operators. Operators can request that some roads be improved and partnered with local leadership to fund those improvements, resulting in more efficient and safer travel for all.
- Community leaders noted that relationships between operator and municipalities are a very individualistic process, and many local governments are willing to assist operators in learning about the local landscape.
- Community investment in education, business, workforce development, and local environment are generally visible to community members and seen positively.
- Promote programs/campaigns reinforcing industry is listening and leading the way integrating with community groups, chamber of commerce, etc.

8 Five Phase Model – Oil and Natural Gas Projects

8.1 General

The Plan-Do-Check-Act model, Community and Stakeholder Assessment, Engagement Planning, and Engagement can be applied to the five-phase model of oil and natural gas development. The Five Phase Model shown in Figure 9 provides additional insight into specific activities to undertake during different phases of development. Although each Community Engagement Plan will look different based on the information found through the Community & Stakeholder Assessment and the timeline of the project, the model below can provide an example of how ongoing engagement may change throughout the lifecycle of a project. Note that the five phases are not necessarily distinct or sequential as phases overlap and the transitions between phases vary in length of time from one to another. For example, the reclamation and restoration of areas affected by oil and natural gas activities, if any, is ongoing and can happen during any phase of the project.

Five Phase Model – Oil and Gas Projects



Figure 9 — Five Phase Model

8.2 Entry Phase

8.2.1 During the entry phase, an oil and natural gas company investigates and study's potential locations and, after considering a variety of factors, can acquire initial leasehold areas.

8.2.2 For many operators, the entry phase can be considered investigative in nature, although community members may already have seen oil and natural gas activity in the area.

8.2.3 This can be a good time to begin the Community and Stakeholder Assessment. Learning more about the project area, communities, and stakeholders can augment the investigative nature of the entry phase. Some communications with key stakeholders may need to begin very early in the entry phase as the company gathers decision-making criteria such as available infrastructure, land availability, and the presence of other operators.

8.2.4 Community Engagement activities during this stage may include the following.

- a) Begin Community & Stakeholder Assessment research.
- b) Develop communication strategies for entry phase contacts such as contractors, community leaders, government officials, employees, and other key stakeholders as needed.
- c) Convey key company messages regarding safety, environment, and health practices to contractors, vendors, and suppliers.
- d) Begin to build a communication strategy including a timeline when information will be disseminated locally, regionally, and with state officials.

- e) Provide consistent communication and information packets with the release of entry phase information.
- f) At the appropriate time and to the appropriate extent, review high-level~~potential~~ operational plans with key stakeholders, contractors, vendors, and suppliers to maintain consistent information on the company's activities.
- g) Develop information packets that can be distributed at community engagements that include company information and contacts, press release information, frequently-asked-questions (FAQs), brochures, and other educational information that explains company values and current operational activities, or any relevant performance indicators or metrics; introduce key company personnel.
- h) Disseminate educational materials informing stakeholders about potential impending operational activities that provide facts. Consider collaboration with regional educational institutions and/or government/regulatory agencies offering important, independent third-party information.
- i) Utilize industry associations and regulatory agencies to assist or complement education and awareness campaigns and adopt useful resources developed specifically for the industry.
- j) Proactively design processes and incorporate potential impacts into the company strategy while including and preparing for activities for the next phase, exploration.
- k) Prepare for possible withdrawal (sale of assets, non-viable resource, etc.) from the area and a plan for communicating to key stakeholders, notifying them of the company's decision.
- l) Manage stakeholder expectations through clear, regular communication while the company processes information and data to make a decision to move a project forward, or to exit.

8.3 Exploration Phase

8.3.1 During the exploration phase, a variety of operational activities begin, and company visibility greatly increases in local areas due to the influx of vehicles, equipment, and personnel. Seismic or other related activities can be conducted to assess the viability of resource development. Companies continue to hire contractors, vendors, and direct employees.

8.3.2 A company can start to build access roads, construct well pads, and can possibly start exploratory drilling. If proven beneficial resources are discovered, operations can potentially last for decades.

8.3.3 Focusing on transparency, open dialogue and education with stakeholders is essential during this phase to keep stakeholders informed, understand their concerns, and build alignment of expectations. It is equally important to inform stakeholders if it is likely that resources cannot be developed, as it is to prepare them for future development activities. Being proactive and preparing stakeholders for differing scenarios, understanding their concerns, and ensuring that personnel and contractors representing the company communicate the same messages are important.

8.3.4 Considerations from the entry phase are still relevant and advisable to continue, as applicable.

8.3.5 Considerations for the Exploration phase can include the following.

- a) Conducting frequent engagement with landowners and other affected stakeholders in the project area through one on-one meetings, open houses and community meetings, or informational sessions to disclose information; host appropriate meetings to introduce arriving key local personnel and contractors to the community; engage, listen, and field questions during this active phase.

- b) Engaging with stakeholders on issues of concern such as road safety and traffic management including developing strategies to decrease burden on local infrastructure, agencies, and schools. Reinforce expectations for company and contract personnel regarding road and traffic safety behaviors. Consider working with law enforcement agencies, department of transportation services, emergency services personnel and schools in the local area.
- c) Engaging with elected officials, local authorities, regulatory agencies, commissioners, and other key government stakeholders to confirm understanding of respective rights, where appropriate.
- d) Providing communication materials that convey company values and general operating information; provide information packages; assist community and stakeholders in understanding the company, its business goals, and approach to responsible operations; and engage in two-way communication to understand community perspectives regarding issues and challenges.
- e) Offering and providing access to a community feedback mechanism and engaging in two-way dialogue to address issues, challenges and opportunities for involvement or collaboration.
- f) Assessing opportunities for workforce development with key community stakeholders and local or regional educational institutions.
- g) Determining the best media and technology vehicles for community access to the company and communicating and displaying ways in which community members and other stakeholders have access to key local personnel or those at corporate headquarters.

8.4 Development Phase

8.4.1 Industry activities move into the development phase once it has been determined that an area has proven beneficial resources. In the development phase, oil and natural gas operators determine what additional capital investment is required to develop the full resource potential of the area. Several aspects of the exploration and Development phases are similar (e.g., well pad construction/drilling/completions). A key difference is the significant increase of those activities during the development phase.

8.4.2 Furthermore, preparation for the production phase includes the construction of new facilities, pipelines, and compressor stations that will contribute to distribution of the resources. In areas where multiple wells are drilled on a single pad location, the development and production phases can overlap. Communities can expect to see the highest level of industry activities during this phase, particularly an increase in road traffic and noise levels.

8.4.3 Considerations from the Entry and Exploration phases are still relevant and advisable to continue, as applicable.

8.4.4 Considerations for the Development phase can include the following.

- a) Providing updates by engaging emergency services and first responders keeping them aware of activities, drilling dates, construction, and infrastructure development, and for planning personnel movements at peak times or in high volume traffic areas.
- b) Maintaining collaborative relations with local authorities and regulatory agencies having direct oversight to traffic management and road safety and include maintenance and seasonal challenges. Build awareness campaigns on safe driving; collaborate with other operators and contractors in the area for multi-use campaigns.
- c) Assessing, planning, and implementing strategies for additional potential operational impacts specific to development and soon-to-be production as it relates to engagement with stakeholders on various issues.

- d) Incorporating diversity, equity, inclusion, and accessibility (DEIA) principles in hiring and labor management practices.
- e) Maintaining relationships with surface and mineral owners; include specific information addressing their reasonable needs and issues.
- f) Managing and promoting best practices and industry standards in safety, environment, and health, implement 'good neighbor policies,' and stress ethical business practices and behaviors.
- g) Building relationships to bridge opportunities in anticipation and for preparation of the Operations/Production phase.
- h) Informing communities on potential economic impacts; host collaborative dialogues that address challenges and issues created by the presence of the oil and natural gas industry; discuss positive potential impacts such as job creation, awarding local supplier and vendor contracts, and building capacity with local agencies; and where feasible, develop local hiring strategy.
- i) Evaluating community investments to support local activities and non-profit organizations; participating on boards and join local organizations to learn about local issues and perspectives while providing expertise and solutions for local challenges and issues.
- j) Collaborating with local and regional universities, colleges, and vocational institutions for job training needs for current and future workforce staffing solutions; engage K-12 students on oil and natural gas activities including health, safety, and environmental practices, and careers in the industry.

8.5 Operations/Production Phase

8.5.1 The Operation and Production phase of oil and natural gas development involves maintaining and optimizing the product and resources. Value is created through well site planning, lowering costs, and maximizing production through the life of the project. Operational activities have a decreasing footprint and visibility over the course of a well site's operation/production. After the initial extraction techniques are applied, communities can expect production well sites to have less equipment and necessary daily activities requiring less maintenance and company presence.

8.5.2 Considerations from the Entry (see 8.2), Exploration (see 8.3), and Development (see 8.4) phases are still relevant and advisable to continue, as applicable.

8.5.3 Considerations for the Operations/Production phase can include the following.

- a) Addressing community questions and inquiries, promptly and as appropriate, with regards to the ongoing management of health, safety, and environment activities.
- b) Providing consistent and timely implementation of community feedback mechanism through transparent information, identifying solutions, and closing out issues with concerned stakeholders.
- c) Developing and implementing an ongoing strategy to engage elected officials, commissioners, local authorities, and other key government stakeholders on public policy issues and legislation.
- d) Addressing applicable community infrastructure concerns by conducting planned maintenance checks.
- e) Continuously improving and maintaining high standards and behaviors for road and traffic safety.
- f) Incorporating diversity, equity, inclusion, and accessibility (DEIA) principles in hiring and labor management practices.

- g) Engaging key stakeholders and maintaining communication strategies that include the following.
- h) Maintaining two-way communication (listening, feedback, discussions); and provide educational materials and host informational sessions for schools and other interested and targeted stakeholder groups.
- i) Maintaining open communication by adhering to industry and best management suggested practices, following 'good neighbor policies,' -and collaborating with local and regional educational institutions.
- j) Collaboratively working as an industry in the geographic region for outreach to students on career opportunities and unique jobs in oil and natural gas, providing demonstrations and tours.
- k) Identifying opportunities to work and engaging with local non-profit and government organizations to build capacity and enhance benefits to local communities. Consider supporting programs within the community that support company values and offer sustainable, long-term benefits; encourage employees to volunteer with local organizations, perhaps establishing a reward or recognition mechanism for giving their time and talents.
- l) Assisting and supporting trade organizations for engagement activities; consider sponsorship of local initiatives such as road safety, trash pick-up, education, environmental conservation and biodiversity, or other interested areas as suggested by stakeholders.

8.6 Exit Phase

8.6.1 While an asset can have a lifespan of several decades, it is important to start planning for the eventual exit of the company and its resources from the asset or for the transfer or sale of the asset to another operator. A key aspect during the Exit phase is regular engagements with local communities and key stakeholders. During divestment or exchange of an asset from one company to another, to enable a smooth transition, it is recommended that the outgoing operator provide the incoming company with details about its practices over the years, key relationships developed, and any outstanding community issues.

8.6.2 Reasons for exiting can vary. An operator can have concluded development and production of its leases and is ceasing operations in the area; or an operator can have determined that the asset no longer aligns with its strategic priorities.

8.6.3 Preparing the community for the withdrawal of services, including any economic, social, and environmental programs that can have been supported for a significant duration, needs careful preparation. Just as the company planned for its original entry to the area, it is also recommended that a company plan and engage for its approximate exit date.

8.6.4 Considerations can still apply from the previous phases of Entry, Exploration, and Development, and Operations/Productions phases. Reclamation and restoration can also occur at any phase of an oil and natural gas project and is recognized as ongoing until land is restored appropriately. Communities can expect the land to be reclaimed or restored as close as possible to its original or current surrounding state.

8.6.5 Considerations for the Exit phase can include the following.

- a) Consistent and forward-looking focus on safety and the environment; rectify any potential risks that can impact people, communities, or the environment after decommissioning.
- b) Decreasing surface footprint by demonstrating the same level of care during remediation and restoration as during construction, reducing surface disturbances, or potential impacts.
- c) Identifying and engaging with key community leaders and other stakeholders to solicit their input and feedback on exit strategy to manage expectations.

- d) If on public lands, consider involving the adjacent community and/or surface owner(s) in developing final land use for restored areas developing land to pre-activity condition, at minimum; consider land use options that will further improve community such as recreational or education areas.
- e) Conducting community meetings during decommissioning allowing stakeholders to have adequate opportunity to raise issues and concerns so that there are no lingering issues or concerns; develop communication channels for the community to access the company post-decommissioning.

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Annex A (informative)

Quick Reference Resources

A.1 The following websites offer additional information on environmental justice and community engagement.

- [United Nations Sustainable Development Goals \(2015\)](#)
- [International Labor Organization](#)

A.2 Table A.1 provides a list of community engagement tools offered by states that have industry operations.

Table A.1 — State Environmental Justice Tools

State	Tool	Operating Body
California	CalEnviroScreen	California Office of Environmental Health Hazard Assessment
Colorado	Colorado EnviroScreen	Colorado Department of Public Health and Environment
Colorado	Environmental Justice Demo Map	Mapping for Environmental Justice
Connecticut	Connecticut Environmental Justice Communities	Connecticut Department of Energy and Environmental Protection
Illinois	Environmental Justice Communities	Illinois Solar For All
Illinois	Illinois EJStart	Illinois EPA
Indiana	Hoosier Resilience Index	Indiana University
Maryland	MD EJSCREEN	Maryland Environmental Health Network
Massachusetts	Environmental Justice Viewer	Massachusetts Department of Environmental Protection
Michigan	Screening Tool for Environmental Justice in Michigan	University of Michigan
Michigan	MiEJScreen	Michigan Department of Environment
Minnesota	Understanding Environmental Justice in Minnesota	Minnesota Pollution Control Agency
New Jersey	New Jersey Environmental Justice Mapping Tool	New Jersey Department of Environmental Protection
New York	Potential Environmental Justice Areas	New York Department of Environmental Conservation

State	Tool	Operating Body
North Carolina	<u>North Carolina Community Mapping System</u>	North Carolina Department of Environmental Quality
Pennsylvania	<u>Environmental Justice Areas Viewer</u>	Pennsylvania Department of Environmental Protection
Virginia	<u>Environmental Justice Demo Map</u>	Mapping for Environmental Justice
Washington	<u>Washington Tracking Network</u>	Washington Department of Health

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- [2] Ipieca⁶ *Indigenous Peoples and the oil and gas industry: context, issues and emerging good practice*, April 2012
- [3] Ipieca *Community grievance mechanisms in the oil and gas industry*, January 2015
- [4] Ipieca *Community Grievance Mechanisms toolbox*, May 2014
- [5] Responsible Steel⁷ [Responsible Steel Standard, Version 1.0, November 2019](#)
- [6] Department of Energy, [Community Benefit Agreement \(CBA\) Toolkit](#)
- [7] Department of Energy, [Guide to Advancing Opportunities for Community Benefits through Energy Project Development](#), August 2017

⁶ Ipieca, 14th Floor, City Tower, 40 Basinghall Street, London, EC2V 5DE, United Kingdom, www.ipieca.org.

⁷ [5]Responsible Steel, info@responsiblesteel.org.