GUIDANCE

API RP 1185 is a flexible and scalable framework, but what does that mean? Let's look at:

Full Range of Stakeholders

Let's be honest that this can seem overwhelming – RP 1185 requires operators to identify and understand stakeholder interests and confirm that information is appropriate to the specific pipeline system, geographic area or circumstances - but where does one start…where does one stop? The first step to acknowledge is this will look different for every operator as every organization and project is unique.

It'll also be helpful to determine where to start using RP1185. For example, will your organization start with existing operations or new projects and operations thereafter? Most organizations will likely start applying it to new projects.

It may be helpful to compartmentalize stakeholders into three levels: stakeholder groups applicable in every scenario, stakeholder groups for specific projects and stakeholders themselves.

With that, determine what's known for new ~~projects~~ or existing systems. Consider leveraging FERC stakeholder lists and regulated public awareness programs for existing systems or new projects in existing corridors. This is a great start! Without such information, you will then need to build out from existing rights of way or new project areas. Although public awareness programs take into account linguistic differences, more is needed to meet the intent of the RP. We need to go deeper to understand groups active in the community, local social, economic, and historical dynamics, and barriers to participation, such as logistical and physical challenges, lack of technology, and more. Here are some considerations to develop a deeper understanding of those in the communities for a new project:

- Start as early as possible to build relationships locally; this may be before the permit is in place.
- Look across your organization to gather information on engagement from other internal teams; maybe centralize stakeholder data in a single system.
- Lean on your local employees and their knowledge of the community.
- If local employees aren't nearby, work with a local consultant who knows the community and can make introductions.Talk with elected officials and see who they say are influential or important forces in the community.
- Reach out to the Municipal engagement team.
- Contact nearby and interested Tribes.
- Create a stakeholder map.

Shall: As used in a standard, "shall" denotes a minimum requirement in order to conform to the standard.

Should: As used in a standard, "should" denotes a recommendation or that which is advised but not required in order to conform to the standard.

5.3.1 Full Range of Stakeholders

In addition, the operator shall also, in good faith, seek to identify communities that can need more targeted engagement because they face barriers that may be difficult to overcome, such as linguistic differences, lack of transportation, physical and cognitive differences, lack of access to childcare, and lack of access to technology, among other barriers.

The operator should consider applicable federal, state, and local guidelines and regulations for identifying the full range of stakeholders, including the factors described in Annex A.

The operator should have a process for identifying and considering new environmental justice identification tools as they become available from

5.3.1 continued

local, state, and federal governments, including Tribes.

Going even deeper, consider

- Participation in the Chamber of Commerce or similar groups.
- Research and connect with non-profits or community groups and learn how to best engage with their members.
- Go to potential stakeholders' locations like retirement homes, churches and recreation centers.
- Understand and leverage the information in the census.

As you learn about communities and can be more intentional about engaging, consider reaching out in a way that appeals visually, auditorily, and kinesthetically. Using various tactics will ideally uncover interested stakeholders. Some examples include:

- Newspaper (still popular in smaller communities) plus Facebook, X and other social media platforms.
- Posters in local establishments.
- Surveys.
- Radio advertisements.

Often, organizations have a projects department and an operations department. When it comes to engagement, it may be worthwhile to include operations in the project periodically to foster relationships in the community.

5.4 Minimum Program Documents

Operators shall maintain several documents for monitoring (section 9.3) and evaluating (section 9.4) their engagement programs.

- Description of the process used.
- How information is stored and maintained.
- Process for refreshing lists.
- Policy and procedures for maintaining information shared by stakeholders.

Documentation is important in an engagement program. Minimum program documents to support the responsibilities in this area include:

- A documented process that identifies, understands, and confirms potential stakeholders.
- A way to store information about stakeholders. In addition to the logistical information, consider storing detailed information such as their interests. It may be helpful to store how you learned they are a stakeholder. Was it, for example, through the public awareness program, Chamber of Commerce, a daycare, etc?
  - Some organizations may opt for an in-house database or spreadsheet.
  - Customer Relationship Management (CRM) software may guide what and how to store information.
- A process on how to enter information about new stakeholders and touchpoints with existing stakeholders into the chosen storage methodology.
  - Perhaps information can be entered in real-time using technology like tablets (iPads).
- A process that indicates the review frequency and maintenance of your stakeholder storage system to maintain quality.
- A process to identify and assign read or write access.
- The above-mentioned processes could be grouped into a larger process document or a sub-program.