

Shall / Conditional Shall Statements by section based on RP 1185, first edition.

1. **Commit and Align** (Section 4): Describes how operators, through their management, demonstrate the organization's commitment to stakeholder engagement.
 - a. The pipeline operator shall maintain a program for engagement with stakeholders.
 - b. Top management shall undertake steps to demonstrate commitment to the program.
 - c. Management, supported by top management, shall demonstrate commitment to the program and alignment of appropriate resources.
 - d. Top management shall lead and demonstrate its commitment to the development, implementation, continuous improvement, and evaluation of the maturity of its stakeholder engagement program.
 - e. This shall entail establishing and maintaining engagement policies, goals, and objectives that align with the organization's vision and values, and the principles of this RP.
 - f. Top management shall establish high-level performance measures for transparency and engagement.
 - g. Top management shall communicate to employees and stakeholders its commitment to engagement.
 - h. Top management shall ensure that engagement programs are adequately budgeted and resourced.
 - i. Management, supported by top management, shall demonstrate its commitment and alignment of resources to engagement.
 - j. Management shall identify key personnel accountable for engagement success across the pipeline life cycle and support the clear connection between objectives and day-to-day work activities, including those needed to meet the requirements of this RP.
 - k. Management shall integrate annual reviews of the engagement program into PSMS management or company program reviews, with an emphasis on implementation, continuous improvement, and recommending changes to the program.
2. **Identify, Understand, and Confirm** (Section 5): Describes stakeholders who should be the subject of engagement.
 - a. The pipeline operator shall have an engagement program that strives to identify and understand stakeholders' interests and confirm the accuracy of their information as appropriate to a specific pipeline system, geographic area, or circumstance.
 - b. [Therefore,] the identification process shall consider historical and current environmental and social injustices, including economic, racial, health, and other disparities, and how these injustices and disparities may have been produced or exacerbated by cumulative historical impacts.

- c. The operator shall make good faith efforts to identify and include applicable Tribal/Indigenous Nations that may be present (or have an interest) along a potential or existing right-of-way, in the region of the right-of-way, or with rights or cultural resources near the right-of-way (even if a Tribe or nation no longer resides in the area but still has rights or cultural or natural resources in the area).
- d. [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 child care, and lack of access to technology, among other barriers.
- e. The operator shall make good faith efforts to identify pertinent legal rights held by identified stakeholders and have a process to understand and acknowledge those rights.
- f. The operator shall identify and seek to understand stakeholders' interests related to the engagement objectives of the pipeline's specific life cycle stage, consistent with the principles of engagement defined in the Foundation section of this RP.
- g. In identifying stakeholders, the operator shall strive to identify key contacts.
- h. The operator shall have a process for refreshing lists of known stakeholders and identifying new stakeholders as the pipeline moves from one life cycle stage to another (for example, from completion of pipeline installation to testing), with hand-over to personnel responsible for operations and maintenance, and, as applicable, for integrity management.
- i. The operator shall have a process for documenting stakeholders who have expressed interest in engagement, and then engage accordingly.
- j. [Once stakeholders are identified and an understanding of their interests, rights, and affiliations has been confirmed,] operators shall identify and educate applicable employees and contractors about who the different stakeholders are, their interests, and rights.

3. Plan and Prepare (Section 6): Describes how operators get ready for stakeholder engagement activities.

- a. The pipeline operator's engagement program shall have a process for planning and preparing for engagement with stakeholders.
- b. [Finally,] operators shall provide access to necessary resources, including training, so that pertinent employees understand leading practices and applicable laws and rights related to safety, health, and environmental justice, and can apply that knowledge while engaging with stakeholders.
- c. Operators shall plan, prepare, and establish clear channels for stakeholders seeking to connect with the operator.
- d. Operators shall consider a variety of ways to engage with groups of stakeholders.

- e. Operators shall document key process steps for planning and preparing engagement with stakeholders.
- f. [For new pipeline projects, expansions, or significant changes impacting stakeholders,] the operator shall plan to engage early in the development process.
- g. Operators shall strive to share non-confidential information, especially for new projects and significant expansions or changes.

4. **Share Information** (Section 7): Describes what operators should share as part of baseline information.
- a. The pipeline operator's engagement program shall have a process for developing and sharing initial baseline information about a pipeline or project to encourage initial engagement.
 - b. The back-and-forth engagement between stakeholders and an operator shall start with using this baseline information or at any other point where a stakeholder requests information.
 - c. The baseline information shall strive to reflect the needs of stakeholders from the "Identify, Understand and Confirm" phase (Section 5) and the results of the "Plan and Prepare" phase (Section 6).
 - d. Operators shall develop a baseline set of information sufficient to inform recipients about the pipeline or project.
 - e. When sharing information in this phase the operator shall include how stakeholders can request more information.

5. **Ask, Listen, and Respond** (Section 8): Describes how operators should engage with stakeholders.
- a. The pipeline operator's engagement program shall have a process for asking stakeholders what they want to know about a pipeline or project, listening to their concerns and observations, and responding to stakeholders' requests.
 - b. The pipeline operator's engagement program shall have a process for responding to stakeholders and sharing information that stakeholders request or that the operator believes will help answer questions throughout the entire pipeline life cycle, from inception to abandonment.
 - c. If the information the stakeholder has requested cannot be provided, the operator shall provide an explanation of why it cannot be provided and work with the stakeholder to find possible alternative information to address the stakeholder's needs.
 - d. The operator shall establish a process for seeking input from stakeholders, i.e., asking and listening.
 - e. The operator shall also have a process for receiving stakeholders' observations, concerns, and requests for information about a pipeline.
 - f. Operators shall also seek information on identifying changing activities, hazards, or impacts around the pipeline to protect people, property, and the environment, especially those that live along the ROW or live and work in the surrounding community.
 - g. Operators shall provide readily accessible contact information, including user-friendly instructions to enable stakeholders to provide information.
 - h. The operator shall be respectful of cultural needs, including the confidentiality

of locations of known cultural sites, resources, and sensitive environmental habitats, plants, and animals. On Tribal lands, this shall entail consultation with Tribal Historic Preservation Offices.

- i. The operator shall prepare personnel to engage with Tribal Nations and those potentially impacted by environmental justice issues and understand the cultures and circumstances of the people with whom they will interact.
- j. The operator shall have a process to address stakeholders' requests using stakeholder information developed under the "Plan and Prepare" element.
- k. The operator's process shall define how stakeholder requests that come into the organization through other channels will be routed to established channels to develop a response and criteria or guidance for timely responses.
- l. The operator shall strive to ensure that its responses are clear, provide the necessary context, are timely, and are expressed in terms that match the stakeholder's understanding level.
- m. The operator shall have a process to track requests and responses and ensure that responses have been provided.

6. **Monitor, Evaluate, and Adjust** (Section 9): Describes how operators should assess, document, verify, and improve stakeholder engagement performance.

- a. The pipeline operator's engagement program shall have a process for monitoring, evaluating, and adjusting its program.
- b. The operator shall have a process for monitoring the execution of processes developed for each of the elements in this RP.
- c. The operator shall evaluate its engagement program to determine its effectiveness showing connection to a "Plan, Do, Check, Act/Adjust" process.
- d. The operator shall have a process adjusting its engagement program to improve its effectiveness.