

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

Planning Considerations

This is a complex area, and it is helpful to recognize early on which employees prefer to work behind the scenes and those who enjoy the front line. Both are needed for effective planning.

First, determine who should be involved and to what degree.

Next and at a minimum, operators need to ensure that these employees have access to and are familiar with applicable laws and rights regarding people.

Ideas to help with this include:

- Checking with your organization's human resources department may generate additional ideas than the ones listed below.
- Thinking outside the government regulations, like CFR 192 & 195, list (informally or formally) applicable laws and rights related to people. Consider storing it on the intranet or shared folder so the list is accessible by employees needing it.
- Collaborating with energy industry groups, plus non-industry groups such as land developers.
- Hosting an environmental justice workshop where operators use and overlay the EJ map with assets.

What is a right?
Many landowners have legal rights protected by their easement agreements. Additionally, recognized tribes possess legal and treaty rights safeguarded by the U.S. Constitution.

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

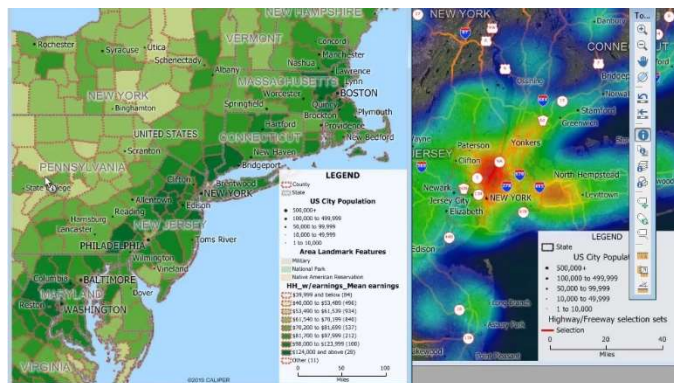
Should: As used in a standard, "should" denotes a recommendation or that which is advised but not required in order to conform to the standard.

6.3 Planning Considerations

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.

In planning for engagement, the operator should consider their understanding of each defined stakeholder's interests, needs and concerns, and update as needed. The operator should also use the stakeholder Identification, Understanding and Confirming process. The operator should recognize that communication between different stakeholders may help them learn about each

With the requirements better understood, determine your stakeholders and the engagement techniques best suited for your stakeholders. Behind the scenes, each stakeholder group's NICE analysis (needs, interests, concerns, and expectations) can lay the foundation. Integrating risk into the analysis may aid with prioritizing. GIS mapping tools with multiple layers may provide more



Example of a GIS map

awareness of external stakeholders. Select appropriate techniques meaningful to the organization and its stakeholders, recognizing that communication delivery and understanding vary.



Training for the frontline, those directly engaging with stakeholders, may benefit from

- Inclusion training, including understanding equity, diversity, belonging, and accessibility.
- Annual operator training highlighting applicable laws and rights.
- Practice training/role playing on having conversations and adapting as needed.
- Learning about vulnerable communities and equity-related challenges leads to empathy and more effective approaches.
- Using and understanding how a feedback loop contributes to continual improvement.
- Knowing who to contact for more information.

Consider reviewing internal teams to see where the above is occurring or where it is best positioned within the organization.

Documentation is important in an engagement program.

At a minimum, document the key steps in planning and preparing stakeholder engagement. Considerations include:

- Identifying staff and the type/level of training and resources needed.
- Outlining how confirmed stakeholders' information is used for each phase of the pipeline lifecycle.
- Recording and resolving feedback (a feedback loop).
- Methods for connecting with identified stakeholders and for stakeholders who do not respond to initial attempts.
- Providing methods for stakeholders to self-identify themselves and their preferred connection methods.
- Tracking of existing confirmed contacts, affiliations, interests, rights, etc.;

At times throughout the pipeline life cycle, there may be situations where operations may appear irregular or not normal. It might be helpful to:

- Define and document what is meant by irregular, not normal, or atypical for your organization.
- Trend the data in your documented feedback mechanism to help define what is irregular.
- Review the outcomes in the above bullets to identify opportunities to plan and engage proactively.

6.3 Cont.

other's engagement needs and concerns.

Operators should engage stakeholders from affected vulnerable communities and populations to learn. Operators should also consider collaborating in their engagement with regional and national pipeline safety advocacy groups, environmental groups, landowner groups, community organizations, local governments and Tribes, and directly with residents in communities with environmental justice concerns.

6.7 Minimum Program Documents

Operators shall maintain the following:

- Key process steps for planning and preparing engagement with stakeholders.
- A description of how the operator will engage with stakeholders during the stages of a pipeline life cycle.