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

Engagement Considerations Over the Pipeline Life Cycle

A holistic view or plan for engagement can be beneficial as there are opportunities to leverage information from one phase to the next. Although three clauses address considerations over the lifecycle with rationale supporting the importance, this guidance brief focuses on 6.6.1 New Pipeline and Pipeline Expansion Projects.

It is helpful to recognize that New Pipeline and Pipeline Expansion Projects mean change, and each person's tolerance for change varies. Although long-term change is beneficial overall, the imminent change can be challenging. An example of this may be road closures or delays or the presence of large machinery in what is typically a quiet area. People may not like it, but they appreciate being informed to adjust to the impact on day-to-day living. Knowing this, consider spreading the word through stakeholder resources by leveraging their channels to amplify the message further.

Engaging with stakeholders early and often eases everyone into what will happen. If it is early enough, some of the stakeholders' concerns may be able to be addressed. This can be powerful if the stakeholders feel heard. If an operator is too far along in the build process, significant changes may not be possible.

> Some organizations may have a project management office (PMO) with a tremendous amount of rigor. An impact assessment, for example, may inform an organization's stakeholder engagement plan.

Capturing and resolving feedback is needed to demonstrate operators are listening. The input may uncover something unknown for the operator, resulting in project changes.

A variety of engagement techniques help to broaden the reach. Some methods are aimed at providing information, others for gathering information from stakeholders, and a few at inviting stakeholders to be more involved[1] in project planning. Early inclusionary engagement benefits both the stakeholders and operators.

Consider the following stakeholders:

- local governments (municipal, county, township, parish, etc.)
- Tribal governments
- landowners and tenants

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[1] Involved is not synonymous with decision making.

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.

6.6 Engagement Considerations Over the Pipeline Life Cycle

6.6.1 New Pipeline and Pipeline Expansion Projects

For new pipeline projects, expansions or significant changes impacting stakeholders, the operator shall plan to engage early in the development process.

Planning and preparing should include the use of a variety of the tools. Operators should plan and prepare to engage early.

Operators shall strive to share non-confidential information, especially for new projects and significant expansions or changes.

- residents living adjacent to the pipeline ROW or proposed ROW, including homeowner associations
- stakeholders and businesses impacted or concerned about the project
- the federal government for interstate projects and intrastate projects as applicable
- state governments for intrastate and interstate projects, as applicable
- non-governmental organizations (NGOs)

While engaging, being honest about the level of transparency is essential. The word transparency is often misinterpreted as 'share everything' where some information must remain confidential. If some requested information is confidential, the operator should work with the requesting stakeholder to understand their needs and provide alternative information to meet those needs. At the same time, answering questions and sharing non-confidential information is helpful. Being open to what information can/cannot be shared with rationale helps to let stakeholders know you have heard them and, ideally, builds two-way relationships that are responsive and trustworthy.

As these projects move into operations, the level of engagement will likely decrease as companies' Public Awareness Programs guided by RP 1162 and community investment programs are active with existing pipelines.

Regardless of the size of your organization, documenting your stakeholder engagement from early in the project phase enables the operator to build on that documentation for each phase of the pipeline's lifecycle.

As with the other guidance briefs, documentation is important in an engagement program. The information below also supports the Planning Considerations and Methods of Engagement briefs.

At a minimum, document your key process steps for 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.

> **6.7 Minimum Program Documents**
>
> Operators <u>shall</u> 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.