

Pipeline Public Engagement

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Foundation

This recommended practice (RP) provides guidance to hazardous liquids and gas transmission and gathering pipeline operators, the general public, stakeholders, governments, and rights holders¹ for effective stakeholder engagement. This RP builds upon and augments existing provisions and is not intended to duplicate requirements of any other consensus standards or regulations, including API RP 1162, *Public Awareness Programs for Pipeline Operators*, and API RP 1173, *Pipeline Safety Management Systems* (PSMS). Public awareness activities are only a part of public engagement. Public awareness activities are intended to inform the public but can be one-way communication activities, whereas engagement entails two-way communication.

The goal of this document is to provide pipeline operators with a framework to review an existing engagement program or develop and implement a new one. Developing or improving a program can enhance the effectiveness of engagement. Operators seeking to conform to this document can build upon established processes within their public awareness programs, and as applicable, engagement processes, to establish new or improve existing engagement programs. Regardless of an operator's starting point, the iterative or cyclic nature of the approach described in this document provides the opportunity for assessment and continuous improvement, with the understanding that it will take time to reach significant and widespread maturity across all elements.

Benefits of Engagement

The benefits of applying this RP are to develop relationships, build trust, and achieve meaningful involvement in the engagement process, with the ultimate objective of improving pipeline safety and environmental stewardship. Pipeline operators can benefit from this guidance as they consider and develop pipeline projects and operate pipeline systems. Members of the public can benefit from this guidance as they learn and understand more about pipelines and as they provide input on pipelines in their community. This guidance can benefit government as it supports public safety and environmental protection.

Core Principles

The good faith application of the following principles comprise the basis of this engagement recommended practice:

- Openness and Transparency: Fosters discussion, sharing of truthful, timely, and relevant information, and willingness to listen and learn and nurture an environment of transparency.
- Respect: Considering and respecting others' points of view by listening to questions, understanding concerns, and allowing each other to share perspectives.
- Reciprocity: Communication and action for mutual benefit, listening as well as speaking, being responsive to inquiries and interests, and sharing responsibility for interactions and relationships.
- Inclusiveness: A deliberate effort to involve stakeholders interested in the subject or action.
- Accessibility: Commitment to provide a variety of methods and opportunities for all interested stakeholders to participate.
- Equity: Recognition that different stakeholders have different resources and live under different circumstances, but all are afforded an opportunity for meaningful engagement to inform decision-making.

¹ Many tribal groups refer to themselves as "rights holders" and not stakeholders.

Effective Engagement

Effective engagement involves establishing and facilitating processes, methods, and tools that allow stakeholders to provide input to an operator. Effective engagement seeks to have a broad set of stakeholders and embody the principles described above. Meaningful engagement will offer different perspectives, allow the public to provide input to an operator's plans and proposed solutions, and allow for public input to be considered in the modification of plans. Modifications may benefit the community as well as the organizations engaged in pipeline operations. This can reduce mistrust and misinformation and help prevent or mitigate miscommunication and misunderstanding about the likelihood and consequences of an unintended release or operations that are or may appear irregular or not normal. The approach outlined here emphasizes proactive engagement between key stakeholders and can embolden them to be involved in the process.

Engagement can be relational, i.e., one-on-one with an individual; it can be personal. Engagement can also be transactional. Stakeholders may simply want information about a pipeline so they are informed and may not be interested in longstanding engagement. Engagement incorporates the core principles identified above into an operator's decision-making, planning, and sharing. Engagement is not something "done to" stakeholders; it is "done with" stakeholders and should never put any stakeholder's physical or emotional safety at risk. Some stakeholders may choose not to engage or may not be ready to engage at a particular time; however, good faith efforts need to be made throughout the engagement process. Effective engagement may not result in agreement or concurrence of all stakeholders, but it does need to reflect the proactive, inclusive, two-way communication embodied in this document.

Effective engagement requires purposeful efforts to connect with stakeholders that face ongoing barriers to participation in pipeline safety. This may include communities and stakeholders historically underrepresented due to economic, cultural, racial, health-related, and other disparities or differences. These communities and populations may face challenges to engagement, such as linguistic differences, lack of transportation, lack of access to technology, and other barriers. Because of these barriers, effective engagement may require proactive efforts that bring tailored resources to address these disparities and differences to achieve meaningful participation, communication, and interaction with and between all participants.

Engagement Elements

This framework intends to comprehensively define a set of elements (i.e., processes) to be consistently applied throughout the pipeline life cycle. While engagement is often thought of as part of the project development phase, engagement spans the life cycle of a pipeline from early siting and design to abandonment or decommissioning. The following elements are intended to apply to any engagement program at any point in a pipeline's life cycle. The six primary elements of this framework are as follows:

- 1) **Commit and Align:** Describes how operators, through their management, demonstrate the organization's commitment to stakeholder engagement.
- 2) **Identify, Understand, and Confirm:** Describes stakeholders who should be the subject of engagement.
- 3) **Plan and Prepare:** Describes how operators get ready for stakeholder engagement activities.
- 4) **Share Information:** Describes what operators should share as part of baseline information.
- 5) **Ask, Listen, and Respond:** Describes how operators should engage with stakeholders.
- 6) **Monitor, Evaluate, and Adjust:** Describes how operators should assess, document, verify, and improve stakeholder engagement performance.

These six elements provide pipeline operators with a framework to evaluate and improve existing practices for engagement with stakeholders and rights holders, or to develop, implement, and evaluate a new engagement system. These elements are depicted in Figure 1.

While the elements are presented as a linear process for operators to follow to initiate engagement, it should be recognized that stakeholders may seek to initiate engagement by requesting information before they have been identified, before any information has been shared with them, or before there is an engagement program in place.



Figure 1—Six Elements of Stakeholder Engagement

Integrating Safety Management Systems and Engagement

Stakeholder engagement is one of the core elements of a pipeline safety management system as set forth in API RP 1173^[2], which establishes basic requirements for stakeholder engagement. RP 1185 builds on the high-level requirements in RP 1173, providing provisions for operators as well as stakeholders to consider in engagement. Effective engagement programs embody concepts essential to safety management systems, including:

- Continuous Improvement: An ongoing learning journey about stakeholders, and learning practices, adjusting, and improving.
- Innovation: Continuous efforts to explore new engagement methods and technologies to advance and improve effectiveness of engagement over time for operators, stakeholders, and the industry.

- Flexibility and Scalability: Tools, processes, and approaches that are adaptive and may differ through a range of engagements, from one-on-one engagement to very broad, expansive engagement with the general public, depending on the stage in a pipeline's life cycle and the level of stakeholder interest.
- Integration: Processes in place to enable dependent and interrelated functions within the organization to share information.

The six elements can be viewed using the concepts of Plan, Do, Check, and Act/Adjust as given in API RP 1173, and as shown below in Figure 2.

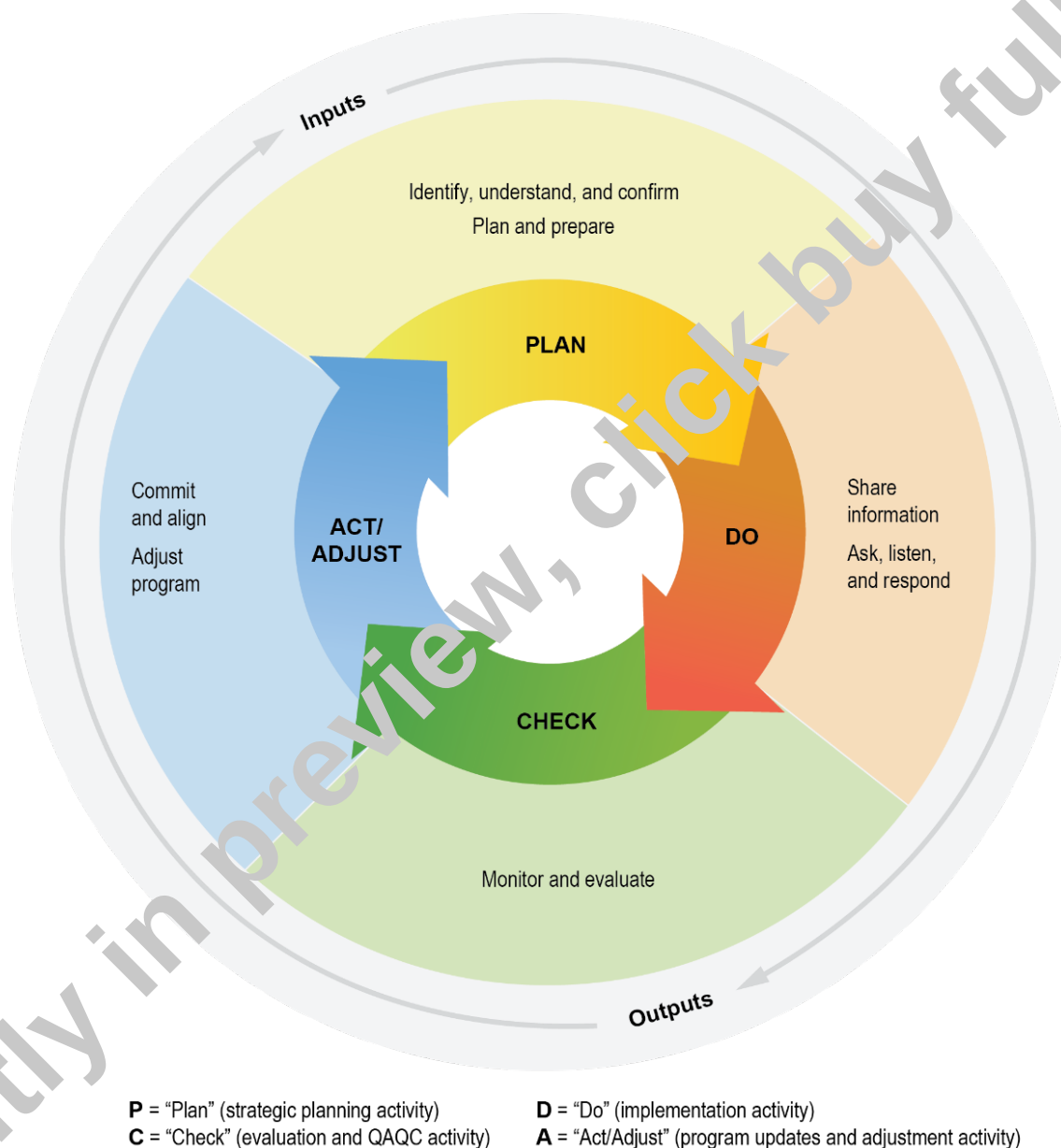


Figure 2—Alignment to Engagement Elements with Plan, Do, Check, and Act/Adjust

Flexibility

This framework should be applied with flexibility to account for the current state of development of particular elements of an operator's engagement program. Flexibility means that the framework can be adjusted by an operator to address the number and variety of stakeholders and the nature of any particular engagement, given local conditions, throughout the life cycle of an asset. Flexibility for stakeholders means they can request and receive information in a time, place, or manner that is convenient for them. Flexibility can also mean that a stakeholder may choose to engage across the entire life cycle or only during certain times when they feel engagement is necessary.

In cases where an operator is already operating under an established, comprehensive engagement program, this framework serves as a basis for comparing and evaluating RP 1185 and the operator's program, which may help identify ways to improve the program. Other operators may have some individually established engagement practices but no comprehensive engagement program. For them, this RP offers guidance on integrating and adding provisions of elements and sub-elements contained within to establish a comprehensive engagement program. In all cases, operators shall have the flexibility to apply this RP as appropriate to their specific circumstances, but with the goal of having a comprehensive and effective program.

Scalability

The framework is scalable, has broad application, and is recommended for pipeline operators of all sizes. The elements comprising the framework apply to organizations of any size and complexity. The level of detail in each pipeline operator's engagement program should be appropriate for the size and location of their operations and potential risk to the public and the environment. Even small operators can and should build on relevant provisions herein to develop an effective engagement program. For stakeholders, "scalable" means that engagement can be adjusted to the size of their organization or community and collaborations between stakeholders with similar interests.

Safety Culture

A robust engagement process with all stakeholders may strengthen safety and the safety culture in an organization by sending a message to employees that their actions affect the community and environment. In addition, sharing leading engagement practices among operators may further strengthen the safety culture of the entire pipeline industry. When executed as deliberate, routine, and intentional, the individual elements are designed to improve communication and coordination, and build a strong safety culture.

Pipeline Public Engagement

1 Scope

This recommended practice (RP) establishes an engagement framework for companies that operate hazardous liquids, gas transmission, or gas gathering pipelines regulated by the U.S. Department of Transportation. The framework enables pipeline operators to develop and implement an engagement program with external stakeholders throughout the life cycle of those pipelines. The scope of this RP does not apply to gas distribution systems, including transmission lines operated by a local distribution company (LDC) or municipality downstream of, or dedicated to, a city gate station. The provisions are not intended to apply to Type R gathering lines or to regulated (Type C) onshore gas gathering lines in Class 1 locations that are 12.75 in. or less in outside diameter that are not required to have public awareness programs. Operators of pipelines outside the scope of this RP and all external stakeholder groups may find this document, including the various leading practices, useful for their pipeline public engagement.

2 Normative References

There are no normative references in this document.

3 Terms and Definitions

For the purposes of this document, the following definitions apply.

3.1

align

Two or more parties have a common understanding, agree upon defined goals and objectives of engagement, and work to achieve them through their actions.

3.2

city gate station

A primary pressure reduction point for the high-pressure pipelines that transfer gas to distribution systems. The basic function of these stations is to link high-pressure transmission pipelines to distribution pipe systems.

NOTE A city gate station usually performs three primary functions:

- a) It reduces the pipeline pressure to operating pressure of the utility pipe system.
- b) It measures the volume of gas delivered to the utility.
- c) Odorant is added to natural gas to enable the detection of gas.

[Source: American Gas Association (AGA), *Leading Practices to Reduce the Possibility of a Natural Gas Over-Pressurization Event*]

3.3

emergency officials

Persons whose jobs (either paid or volunteer) are to plan for and respond to hazardous incidents that either have caused or may cause harm to persons, property, and/or the environment, such as fires and liquid spills.