

## 2. STAKEHOLDER ENGAGEMENT LEGAL REQUIREMENTS

### 2.1. National Requirements

Decree 8633/2012 (Fundamentals of Environmental Impact Assessment), which is administered by the Ministry of Environment (MOE) states that a public consultation must be held with potentially affected stakeholders for all projects that require an EIA. According to Decree 8633/2012 and its implementing decisions, two public consultation events are required for an EIA, one during scoping and one at the end of the EIA stage, but prior to submission of the report to MOE. The public consultation usually consists of conducting a public session, which is open to participation by all members of the public. The MOE requires that an invitation letter to attend the public hearing session be sent to relevant stakeholders including line ministries and public institutions, municipalities, and NGOs. The relevant municipality should post the invitation on their public announcement board to inform the local residents. The invitation should also be published in two newspapers 15 days prior to the public consultation meeting. The invitation should describe the project and express the readiness of the involved parties to receive feedback, complaints and suggestions, and to respond to any questions. A period of one month, starting from the publication date of the invitation, will be given for the public to express their comments and concerns. All concerns raised during the public consultation period should be reviewed, responded to, and addressed in the Scoping and EIA Reports. However, it is not required that the EIA be published.

### 2.2. EBRD Requirements

All EBRD-financed projects must comply with the EBRD's Environmental and Social Policy including Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement. PR 10 recognizes the significance of an open and transparent engagement between the client, workers, local communities and other stakeholders that are directly affected by the project as a vital element for good practice and corporate citizenship.

According to PR 10, stakeholder engagement is defined as an on-going process that should begin at the earliest stage of project planning and continue throughout the life of the project. EBRD Clients are required to implement the following in line with PR10:

- Identification and analyses of stakeholders
- Public disclosure of appropriate information (identified stakeholders are appropriately engaged on environmental and social issues that could potentially affect them);
- Meaningful consultation with affected stakeholders (disclosure of information relevant to the project activities and operations in an understandable culturally appropriate manner) and at a time when their inputs can influence decision making on the Project;
- Effective and prompt mechanism by which people can freely make comments or raise grievances;
- Identification of roles, responsibilities, and authority;
- If needed, special provisions to allow disadvantaged or vulnerable groups or individuals to be informed about project information and give their views on the project.

According to EBRD’s Access to Information Directive (2019), the Bank is required to disclose EIAs for Category A projects 120 calendar days prior to Board of Directors’ consideration for public sector projects. According to this policy the project documentation will be enclosed for public on the EBRD website.

### 3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

#### 3.1. Stakeholder Identification and Analysis

This section identifies all relevant stakeholders including affected communities, interested parties, and individuals and organizations that may be directly or indirectly affected by the project, either positively or negatively, and would like to express their views or concerns.

Table 1 presents the identified stakeholders as well as the purpose and methods of communication which will be used to engage with them. This table will be updated periodically to include any newly identified stakeholders, methods of communication, and planned engagement activities and timeframes, taking into consideration restrictions and risks related to the COVID-19 pandemic.

**Table 1:** Stakeholder Identification and Analysis

Identified Stakeholder	Issues or interests	Communication and engagement method
<b>Local community</b>		
Residents of Bourj Hammoud and area surrounding the WWTP site	Interest in knowing about economic opportunities for the local community during construction and operation of the project Interest to know how the project will impact the surrounding environment and their health and well-being Issues related to tariffs and ability to pay	Public consultation session (if possible) Individual meetings when appropriate Focus group discussions (if possible) Information posted on relevant municipality bulletin board Disclosure of Environmental and Social Impact Assessment (ESIA) on EBRD, Council of Development and Reconstruction (CDR) and BMLWE Websites (if possible)
Residents of the municipalities within the catchment area who will benefit from the wastewater system	Interest in knowing about economic opportunities for the local community during construction and operation of the project Issues related to tariffs and ability to pay	
Vulnerable groups (women, children, elderly, Syrian refugees)	Interest to know how the project will impact their health and well-being Issues related to tariffs and ability to pay	
<b>Relevant government authorities, ministries and public institutions</b>		
Bourj Hammoud Municipality	Interest in project development	Providing project documentation including ESIA Non-Technical
Beirut Municipality	Interest in sharing socioeconomic	

Identified Stakeholder	Issues or interests	Communication and engagement method
Union of municipalities of Metn	information of the study area Interest in providing support with socioeconomic surveys and engagements with local communities, including vulnerable groups Interest in providing project information to affected local communities	Summary and construction and operation Environmental and Social Management Plans
Qaemmaqam of El Metn		
Governor of Mount Lebanon		
Governor of Beirut		
Council for Development and Reconstruction	Interest in project development Interest in timeline and availability of funding for project implementation Issues with construction constraints and conditions	Ongoing communication throughout the life of the project especially for the Environmental and Social Audit Providing all project documents including ESIA for feedback
Ministry of Energy and Water		
Beirut and Mount Lebanon Water Establishment	Interest in project development Interest as the proposed future operator of the project Interest in potential wastewater tariff as revenue	Ongoing communication throughout the life of the project especially for the Environmental and Social Audit Providing project documentation including ESIA and ESMPs for construction and operation
Ministry of Environment	Interest in project development Issuing permits and agreements in accordance with local legislation Control of compliance with local legislation	As defined by national legislation
Ministry of Public Works and Transport		
Ministry of Interior		
Ministry of Public Health		
Ministry of Culture		
Ministry of Agriculture		
Ministry of Finance		
General Directorate of Urban Planning		
<b>Non-governmental organization and private sector</b>		
Local NGOs active in Bourj Hammoud region (see Annex 1 for a list of identified NGOs)	Provide support in identifying key issues affecting the local environment and the local community especially vulnerable groups Interest in reducing pollution and improving health conditions in the area	Public consultation Individual consultation meetings as needed Providing ESIA Non-Technical Summary
International organizations and NGOs		
Sewage tanker operators	Issues on how the project implementation will affect their livelihood	Individual consultation meetings as needed
Design, Supervision and Contracting companies and their employees	Interest in the success of the project since they will be involved in the project planning and implementation Interest in providing employment opportunities	Information through tender procedure and contracts Communication through supervising engineers Training sessions related to environment, social, occupational

Identified Stakeholder	Issues or interests	Communication and engagement method
	Issues related to health and safety conditions Issues related to labour standards	health and safety topics, code of conduct Reporting on construction work progress Worker grievance mechanism
Media	Interest in the environmental and socioeconomic impacts of the project Interest in reducing pollution and improving health conditions in the area Interest to know construction schedule and status of the project and when it will operate Interest in proposed wastewater tariff rate and its impact on the community	Media communications by project staff Public consultation Providing ESIA Non-Technical Summary

### 3.2. Key Informant Interviews

During the ESIA and subject to COVID-19 restrictions, the Consultant will hold key informant interviews with local public officials Mukhtars (females and male), members of the municipality, school principals, representatives of women’s groups and NGOs dealing with Syrian refugees and migrant workers. Though the presence of migrant workers of various ethnicities has been frequently documented in reports, no estimates are currently available, we will collect figures during key informant interviews. Similarly interviews will be carried out with representatives of residents (neighborhood committees where they exist) and with selected residents of different age, gender, and nationality where possible, as well as owners of shops or factories located within the area.

Issues that will be explored during interviews include:

- Economic situation and livelihoods;
- How do people get by, main concerns;
- The different social and economic roles of both women and men in each community and how the project might impact their lives;
- Whether people are connected to the wastewater network;
- People’s perception of sanitary situation and how much they value an improved network;
- Any locations of high cultural to the local community within the project area;
- People’s perception of the project and its potential impacts on their neighborhood and daily lives;
- Whether they believe there are equal opportunities for both men and women to benefit from the project.