

4. STAKEHOLDER ENGAGEMENT PROGRAMME

4.1. Overview

This section defines the main activities that will be undertaken on an on-going basis throughout the lifespan of the project. Various types of information will be disclosed to affected people and relevant stakeholders so that they are informed about the project. In addition, stakeholders will also have the opportunity to raise their comments and submit grievances throughout all project phases.

4.2. Roles and Responsibilities

During project preparation, the Consultant is responsible to support CDR to undertake the ESIA and engage the public in line with MOE requirements and EBRD PR10. Once the project is underway, the Project Implementer (CDR) and Operator (BMLWE) will have the overall responsibility of handling the consultation and information disclosure activities at different phases of the project. This includes organization of the consultation procedure, communication with identified stakeholder groups, collecting and reporting comments and complaints and responding to them. In addition, the main contractors will be responsible for providing precise and updated information to the Project Implementer regarding project activities, timeframes and any community grievances received.

4.3. Safeguards Officer

During construction, CDR will appoint or sub-contract a Community Liaison Officer (CLO) who will be responsible for community liaison and arranging communications with affected communities. The CLO will mainly be responsible for implementing and managing the SEP during the construction phase. The CLO will also manage the implementation of the grievance mechanism during the construction phase and attend stakeholder engagement activities and maintaining records in the stakeholder log for future reporting. Ideally, the CLO will be located in close proximity to the project and its affected stakeholders in an effort to ensure their accessibility.

BMLWE will also appoint or sub-contract a CLO during the operation phase of the project. As this will be a long term position for the lifetime of the project, it may be possible for this position to be designated to an existing employee at BMLWE staff with similar responsibilities.

CLO contact details for construction and operations phases are to be confirmed in an updated version of this plan once they have been assigned.

4.4. Activities, Documents and information to be disclosed

During project preparation, alternative approaches to public consultation in line with Covid-19 restrictions will be undertaken in place of traditional methods for the purposes of the ESIA. Table 2 presents a description of these approaches.

Table 2: Approaches to ESIA stakeholder engagement in line with Covid-19 restrictions

Stakeholder Group	Proposed Method	Presented Information	Limitations
Local Community (including youth and women)	<p>Hard copies of the project flyers will be posted in communal places in affected municipalities (shops, religious buildings, municipalities)</p> <p>Project leaflet on municipality Facebook page (https://www.facebook.com/bourjhammoud.gov.lb/), website page (https://www.bourjhammoud.gov.lb/) and announcement board</p> <p>Phone calls (contacts obtained from municipality) to inform about the project and request method to send the project leaflet (ex. WhatsApp or Email)</p> <p>WhatsApp group created to send out flyer and collect feedback from interested stakeholders</p> <p>Online Skype or Zoom public hearing session</p>	<p>Project components and their locations</p> <p>Expected benefits</p> <p>Potential social and environmental impacts</p> <p>Proposed mitigation and management measures</p> <p>Grievance Mechanism for local community</p>	<p>Trust issues regarding anonymity that will hinder people from participating</p> <p>Poor connection distracting participants</p> <p>Difficulties related to the lack of means to adequately describe the findings and present proposed mitigation and monitoring measures in detail</p>
Local and International NGOs and Women's Associations	<p>Online Skype or Zoom public hearing session</p> <p>Project leaflet to be uploaded on NGO Facebook pages with contact information</p> <p>Report and follow up on all feedback received</p>		

In order to address the limitation related to trust issues, the Consultant will stress with the participants on points related to anonymity and that personal data will not be shared with any other entities. Participants will also be informed that their concerns and information provided by them will be anonymously and discreetly used for the purpose of preparing the ESIA and making recommendations to the client.

Throughout the lifespan of the project, information that might affect the local community and relevant stakeholders will be disclosed. This information includes the construction schedule, updated project information, community consultations reports, community grievance mechanism, grievance logs and annual reporting documents. Disclosure activities also include consultation and information disclosure

events. In general, these activities will be disclosed by CDR through the CLO and main contractors during the construction period. During operation, this will be handled by the BMLWE through the CLO.

Table 3 outlines activities, timing and responsibilities of disclosure and consultation activities, noting that all communications should be prepared and disseminated in English and Arabic languages.

Table 3: Project stakeholder engagement implementation timescales and responsibilities

Activity	Timing/Detail	Responsibility
Project Design Phase		
ESIA Scoping Report	Online through BMLWE website (and CDR if possible) Disclosed locally thereafter	CDR / ESIA Consultant
ESIA Report	During preparation of ESIA, conduct stakeholder engagement as described in Table 2	CDR / ESIA Consultant
Disclosure of Non-technical Summary	Online through BMLWE website (and CDR if possible) Disclosed locally thereafter	CDR / ESIA Consultant
Pre-construction Phase		
CLO Appointment	Appointment of CLO two months before the initiation of the construction activities Introduce the CLO to the local community, wastewater disposal tanker operators and other affected stakeholders one month prior to construction commencing Separate meetings will be conducted with women and other vulnerable groups	CDR
Construction schedules and updated project information	Project schedule and updated project information made available in appropriate language to local communities, identified vulnerable groups, wastewater tanker operators, municipal community representatives and local governmental and non-governmental agencies and organizations one month prior to construction commencement If needed separate meetings will be conducted with women and other vulnerable groups	Contractors, subcontractors, and CLO
Disclosure of community grievance mechanism	Community grievance mechanism explained in appropriate language and grievance forms distributed to local community during meetings with identified vulnerable groups, wastewater tanker operators, municipal community representatives, local governmental and non-governmental agencies and organizations one month prior to construction commencing	CLO

LEBANON
DAOURA/BOURJ HAMMOUD WASTEWATER TREATMENT PLANT
FEASIBILITY STUDY
ESIA Scoping and Stakeholder Engagement Plan
Annex II Stakeholder Engagement Plan

Activity	Timing/Detail	Responsibility
	If needed separate meetings will be conducted with women and other vulnerable groups	
Community consultation events Consultation with local emergency service providers	Consult with agencies responsible for providing emergency services in the project area and the local communities regarding contents and contact details of the emergency plan one month prior to construction commencing	CLO, Health and Safety Officer (from the contractor company)
Construction Phase		
Community consultation events and disclosure of project information along with updated construction schedules	Before the start and end of construction phase as well as when other key project activities change in order to inform communities on potential impacts and relevant mitigations Distribution of project updates in public notice locations If needed separate meetings will be conducted with women and other vulnerable groups Verbal communication in Arabic	CLO, Contractors, and subcontractors
Continuous community liaison and grievance logging and reporting	Communications with affected community representatives Reporting relevant grievances to Contractor Project Manager (PM) Monthly and quarterly summary of grievance reports to CDR by CLO	CLO
SEP Updating	Before the start and at the end of construction phase	CLO
Monthly and Quarterly Reporting	Monthly and quarterly grievance monitoring report to CDR	CLO
Annual Reporting	Analysis of grievance monitoring will be integrated into the project's annual reporting to EBRD	CDR
Operation		
CLO Appointment	Appointment of CLO two months before operation of the WWTP commences. Introduce the CLO to the local community, wastewater disposal tanker operators and other affected stakeholders one month prior to construction commencing If needed separate meetings will be conducted with women and other vulnerable groups.	BMLWE