

**The Lebanese Republic
Ministry of Energy and Water**

**Electricity Services Emergency Support
Project (P177846)**

STAKEHOLDER ENGAGEMENT PLAN

12 February 2022

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LIST OF ABBREVIATIONS AND ACRONYMS

AGP	Arab Gas Pipeline
ALMEE	The Lebanese Association for Energy Saving & for Environment
AND	Akkar Network for Development in Akkar
BDL	Banque du Liban
CCU	Climate Change Unit
COVID-19	Corona Virus Disease
CSO	Civil Society Organization
DAPP	Deir Ammar Power Plant
DRR	Disaster Risk Reduction
E&S	Environmental and Social
E&S	Environmental and Social
EHS	Environmental Health and Safety
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESHS	Environmental, Social, Health and Safety
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESR	Environmental and Social Review
ESS	Environmental and Social Standard
GASCO	Egyptian Company for Natural Gas
GASYLE	The Lebanese Gas Pipeline
GBV	Gender Based Violence
GM	Grievance Mechanism
H&S	Health and Safety
IoE	Institute of Environment (Balamand University)
IPC	Iraq Petroleum Company
IVA	Independent Verification Agency
KPI	Key Performance Indicator
LAP	Lebanese Petroleum Administration
LCEC	Lebanese Center for Energy Conservation

LMP	Labor Management Procedures
LNCSR	Lebanese National Council for Scientific Research
LOGI	Lebanese Oil and Gas Initiative
LOI	Lebanon Oil Installations
LRA	Litani River Authority
LSES	Lebanese Solar Energy Society
MEW	Ministry of Energy and Water
MoE	Ministry of Environment
MoF	Ministry of Finance
NCMS	National Center for Marine Sciences
NGO	Non-Governmental Organization
NOx	Nitrogen Oxides
OHS	Occupational Health and Safety
OHS	Occupational Health and Safety
PAPs	Project Affected Parties
PBCs	Performance-Based Conditions
PDO	Project Development Objective
PIU	Project Implementation Unit
PMU	Project Management Unit
POM	Project Operations Manual
PPE	Personal Protective Equipment
PV	Photovoltaic
ROW	Right of Way
RWE	Regional Water Establishment
SCADA	Supervisory Control and Data Acquisition
SEA/SH	Sexual Exploitation and Abuse /Sexual Harassment
SEP	Stakeholder Engagement Plan
SMP	Security Management Plan
TA	Technical Assistance
TOIL	Tripoli Oil Installations - Lebanon
UNDP	United Nations Development Programme
VFD	Variable Frequency Drives

WB	World Bank
WBG	World Bank Group
WHO	World Health Organization

1. INTRODUCTION

The Project Development Objective is to “provide emergency support to improve electricity supply in Lebanon and improve the sector's financial sustainability.” The Project is to be financed by a US\$200 million IBRD loan.

The Project comprises the following components:

- Component 1 - Natural Gas Purchases for Power Generation (US\$ 270 million):

Component 1 is designed to earmark funding to Lebanon's purchase of Egyptian natural gas and ties these disbursements to Performance-Based Conditions (PBCs). The mechanism aims to provide Egypt some comfort in payment security while, at the same time, enhancing Government commitment to implement agreed reform conditions. The imported gas will travel through the AGP from Egypt through Jordan (Aqaba–Amman–El Rehab section) to Syria where it will get swapped with Syrian gas at equivalent specifications and then delivered to Lebanon at Homs on the Lebanon-Syrian border and subsequently travel on the Lebanese section to the existing 450 MW Deir Amar power plant located north of Tripoli. This will allow the plant, which represents almost 20 percent of EDL's generation, to run at full capacity, hence increasing its electricity supply while reducing its fuel costs and CO₂ emissions by switching from imported diesel.

- Component 2: Enhanced Renewable Energy for Water Services (US\$20 million):

This component includes two sub-components. The first sub-component (Component 2.1) supports rolling out solar photovoltaic (PV) systems, variable frequency drives (VFDs), and Supervisory Control and Data Acquisition (SCADA) control systems for water pumps of Lebanon's Water Establishments. The second sub-component (Component 2.2) supports rehabilitation of the existing Hrache-Jeita Hydro Plant.

- Component 3: Technical Assistance and Capacity Building (US\$10 million):

This component will support technical assistance (TA) such that the MEW, and other associated actors such as EDL, LOI, and BDL to achieve the targeted institutional reforms and performance outcomes of the sector, including, inter alia, establishing and operationalizing the sector regulator, managing implementation of the Government reform plan to be agreed including a communication campaign, preparing bidding documents for the installation of a floating gas terminal at Zahrani and new power plants at Zahrani and Deir Ammar, recruiting the external auditor for EDL and reinforcing its financial reporting and accounting practices, facilitating improvements of collection and commercial losses on the distribution network, developing the cash flow waterfall structure and other parameters of the envisaged payment mechanism under Component 1. The TA will also enhance the MEW's capacity to implement the Project including the recruitment of the independent verification agency (IVA) to validate the achievements of the PBCs and adequate personnel for compliance with fiduciary and environmental and social (E&S) requirements. This will encompass the recruitment of an E&S Consulting Firm to carry out necessary activities as per the E&S Commitment Plan (ESCP) as well as Environmental, Occupational Health and Safety (OHS) and Social specialists to manage relevant E&S activities and supervise the Consulting Firm.

The Ministry of Finance (MoF) will be the Borrower. The implementing agency is the Ministry of Energy and Water (MEW). MEW is responsible to ensure that all safeguard measures are implemented throughout the project's lifecycle. For Component 1, MEW will therefore closely coordinate with Electricite du Liban (EdL) (the subordinate entity responsible for the operation of Deir Ammar Power Plant) and with the Tripoli Oil Installations (TOIL) (the subordinate entity responsible for the operation of the gas pipeline and its associated infrastructure) to ensure implementation of all required measures by the subordinate entities and their sub-contractors. For Component 2, MEW will closely coordination with the Regional Water Authorities.

The Project is expected to provide emergency support to Lebanon's power sector to import natural gas from Egypt through Jordan and Syria on the pre-existing Arab Gas Pipeline (AGP). This imported gas will be used to fuel the existing Deir Ammar power plant north of Tripoli to increase its electricity supply while reducing its fuel costs by switching from diesel. The project will not be involved in the distribution segment of the gas other than feeding the power plant. Switching fuel supply from diesel to natural gas will also lead to significant environmental benefits particularly in terms of reduced air pollutant emissions and Green House Gas (GHG) emissions. The project is also expected to support the water sector by providing solar power to groundwater wells to ensure low-cost and sustainable supply of water resources and to rehabilitate the existing Hrache-Jeita Hydro Plant, therefore supporting the achievement of national renewable energy targets.

The total length of the Arab Gas Pipeline (AGP) is 1,200 km (See Figure 1). The Lebanese Gas Pipeline (GASYLE) is a branch of the AGP. It was built between 2003 and 2007 and was first put in service in 2009 in cooperation with Egyptian Company for Natural Gas (GASCO). It runs around 32 km from the Syrian border to Deir Ammar and has a diameter of 24" in the Right of Way (ROW) that was dedicated for Iraq Petroleum Company (IPC) pipe. Until the start of the war in Syria in 2011, this pipeline was in service and it used to supply natural gas to Deir Ammar Power Plant.¹ Currently, this pipeline is not in service. According to Tripoli Oil Installations, it is still under low pressure and being monitored for any leaks.

Deir Ammar power plant is located at around 90 km north of Beirut. Its construction was commissioned in 1995 and ended in 1998 with a total installed capacity of 435 MW. Deir Ammar power plant is fit and ready to be operated with natural gas although it is currently fueled by diesel. The plant's available capacity is currently 410 MW. The plant is connected to the currently un- operational GASYLE pipeline.

¹ Why plugging Lebanon's power deficit is also an issue for regional gas supply (thenationalnews.com) accessed on October 25, 2021

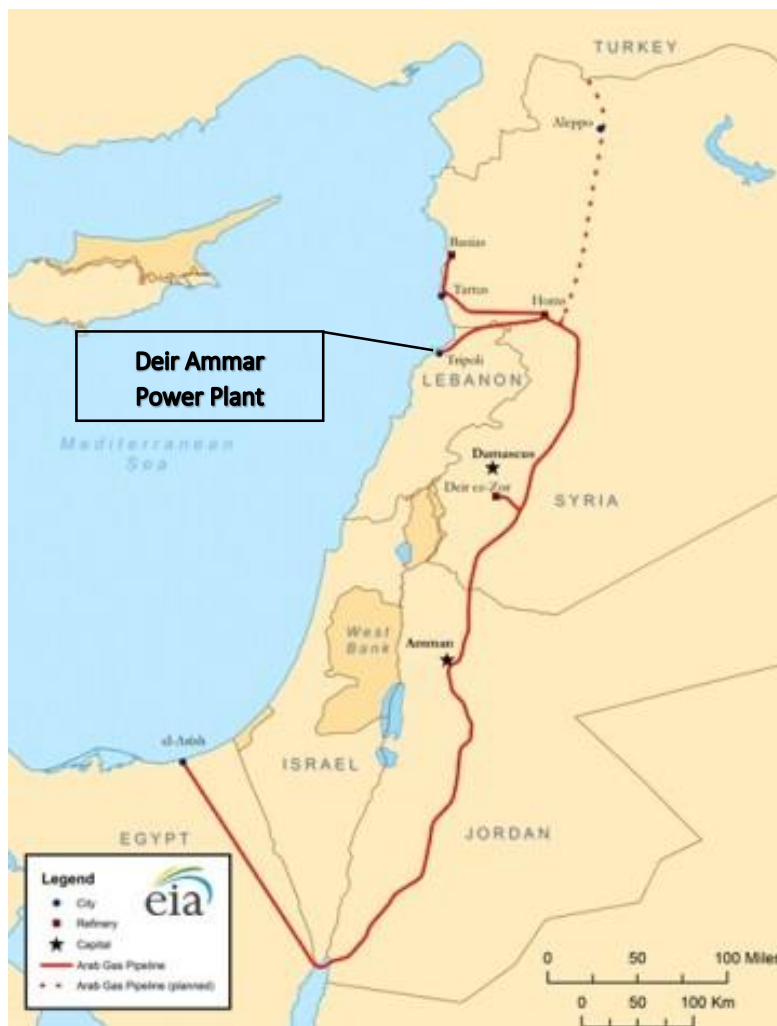


Figure 1-1 The Arab Gas Pipeline from Egypt to Deir Ammar Power Plant (Source: Journal of Petroleum Technology²)

The proposed project is subject to the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard (ESS) 10 - Stakeholders Engagement and Information Disclosure - the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. The overall objective of this draft Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

² Available Online: <https://jpt.spe.org/egypt-snubs-Ing-plans-to-send-gas-to-lebanon-via-the-arab-gas-pipeline>

2. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Initial stakeholder identification and consultation was conducted during the Environmental and Social Review phase during November / December 2021 (Table 2-1) followed by consultations with local communities on February 2, 2022 (Table 2-2) to present the SEP and obtain feedback from the local communities. MEW will continue following-up with all stakeholders who have not responded or could not be reached as part of the due diligence/preparation phase and will engage with all stakeholders as part of the proposed SEP programme described in Section 4.

The most pertinent feedback is described below:

- Municipality of Beddawi indicated that a claim against air pollution from the Deir Amamr Power Plant was filed to MoE a few years back but the official claim could not be found (MoE has not responded yet). The municipality also indicated that a Lebanese army officer drowned because of the suction of the cooling water intake pipe; this happened on 19 September 2020 while spearfishing opposite the power plant.
- A principal of a school located 300 m approximately from the power plant noted that the school is affected by vibrations whenever the power plant is operational. The principal also noted that her balcony tiles were deteriorating because of acid rain.
- The fishermen cooperative in Tripoli indicated that fish stocks were declining but could not scientifically attribute that to the power plant; they are not sure if cooling water outflow into the sea has an adverse impact and they believe sewage is the most important problem in terms of sea pollution.
- Minieh Governmental Hospital referred to increased pulmonary diseases and cancer rates in the area while stating that a scientific study was needed to identify the reasons behind this increase.

In addition to the above, EDL revealed that there was a pending claim against EDL by an individual and that EDL had reached out to MEW for more information on this claim (the correspondence is dated 2018-2019 but the actual claim, which may go back to when the power plant was constructed in 1995 could not be obtained). The claim itself could not be obtained but it was understood that it was about compensation for trees lost based on a land use concession obtained from the previous owner of the land where the power plant was built – Iraq Petroleum Company (IPC). EDL became the new owner of the land after IPC lands where the Deir Ammar Power Plant now stands were expropriated for the benefit of EDL.

The legal department of LOI, the current owner of the pipeline ROW, extending from the gas pipeline Receiving Station at TOIL until the Border Station was also contacted regarding encroachments on the pipeline ROW. LOI's legal department indicated that there are several claims filed by LOI against various parties who had encroached on the ROW and several of them led to the removal of the encroachments while some are still in process (LOI correspondence provided in the Environmental and Social Review (ESR) provides more details and examples on such encroachments).

Consultations with the local communities have also been undertaken on February 2nd, 2022 to discuss this SEP and the findings of the Environmental and Social Review (ESR). The consultations were conducted in the form of interviews with the municipalities and vulnerable groups located in the areas closest to the pipeline. The consultations were held in Minieh, Mhammar, Sammounyeh and Chir Hmairine as these villages have a relatively high population density around the pipeline's RoW and twenty one (21) people were interviewed in total. The vulnerable groups that participated in the consultation were mostly refugees and women. Annex I includes photographic documentation.

During the consultation, interviewees were provided a brief background about the project and explained its benefits. Safety measures that are already put in place to ensure the gas pipeline's integrity were explained and it was explained that environmental, social and safety studies are being conducted to ensure that the project is environmental friendly, socially acceptable and safe.

The aim of the stakeholder engagement with vulnerable groups was to understand this group's concerns regarding the project and about the restrictions that could be implemented and to identify their preferred means to have access to important information. In addition, the municipalities were also interviewed to highlight key issues related to the use of the pipeline's RoW.

The following key questions were asked during the interviews to ensure that vulnerable groups in the area expressed their concerns, in order to consider their needs in the project:

1. For what purpose is the RoW used for, what are the main concerns on possible restrictions on the use of the RoW and what are the potential social impacts that exist from the possible restricted uses of the RoW.
2. What are the best ways to communicate those restrictions and any other project information.
3. What environmental, social, and safety concerns related to the project should be considered during the project operation.
4. What is the best way for them to send a grievance (uptake channel).

Table 2-2 summarizes the main findings of these consultations. Main points are summarized below:

- There is a generally positive attitude towards the project.
- There are primarily agricultural activities that encroach on the pipeline; its relative extent compared to the total agricultural plot will need to be assessed during the ESMP, to assess whether restrictions to these lands, if required, would trigger significant impacts on livelihood; these are however mostly small patches of larger land and are not necessarily going to trigger important impacts on livelihood; communities do expect compensation in case restrictions affect their livelihoods.

- No permanent structures on the ROW have been identified during the site visits and consultations, noting that the areas visited are the ones where human activities are the most dense.

- No one really raised the issue of being too close to the pipeline; focus has been to require stringent safety measures to avoid a major accident; some of the consultees had actually witnessed the construction of the pipeline and felt re-assured by the professional work being undertaken.

Table 2-1. Affected Parties Other than Borrower (MEW, EDL, LOI, TOIL) Contacted during E&S Review Phase

Stakeholder Name	Justification for Engagement during Review Phase	Means of Communication / Information Requested	Summary of Feedback
National Government			
Ministry of Environment (MoE)	Competent authority for Environmental Matters	<p>Official letter signed by MEW Minister requesting:</p> <ul style="list-style-type: none"> Log of all historical complaints against Power Plant / Pipeline / Owner / Operator since design phase prior to inception Copies of all correspondence with MoE since design phase Copies of all inspection reports prepared by MoE General and specific environmental monitoring requirements requested from Deir Ammar PP 	No feedback received as of date of this report. Based on latest follow-up made on January 21, 2022, MoE is still collecting the information. MoE is significantly under-resourced at the moment and is not being able to efficiently respond to requests.
Ministry of Labor	Labor Authority – OHS aspects and labor conditions	<p>Official letter signed by MEW Minister requesting:</p> <ul style="list-style-type: none"> Copies of labor related complaints Records of labor or OHS related inspections conducted by MoL 	MoL replied officially stating that there are no records of complaints and grievances against Power Plant and AGP.
Civil Defense	Fire history	<p>Official letter signed by MEW Minister requesting:</p> <p>Log and report copies of all historical fires</p>	Civil defense replied reporting one fire incident near the pipeline in Aabdeh on 14 Nov 2020 at 9:35 am because of nearby crude oil pipeline. An investigation was launched and a technical report was submitted at the time: The fire's likely cause was a cigarette butt thrown on the side of the

Stakeholder Name	Justification for Engagement during Review Phase	Means of Communication / Information Requested	Summary of Feedback
			road, and the fire spread to reach a small oil spill from the decaying and corroded crude oil pipeline underneath vehicular traffic that may have additionally contributed in the fracturing of the pipeline.
Ministry of Defense	Security history	Official letter signed by MEW Minister requesting: Log and report copies /description of all historical security breaches	The Ministry of Defense noted that it is concerned with the ROW crossing urban areas and associated fire and explosion risk this constitutes. It listed a number of vandalism events, fires, and crude oil thefts and arrests made in regard to the crude oil pipelines; given the dire economic situation and price of fuel, attempts to siphon off very old crude oil (40-50 years old) from the pipelines had increased in the last few years.
Lebanese Army	Security history	Official letter signed by MEW Minister requesting: Log and report copies /description of all historical security breaches	No feedback received as of date of this report
Ministry of Interior and Municipalities (MoIM) - <u>Internal Security Forces</u>	Security history	Official letter signed by MEW Minister requesting: Log and report copies /description of all historical security breaches	No feedback received as of date of this report
Regional and Local Authorities			
Governor of North (محافظة)	Highest authority in Governorate (Mohafazat)	Telephone Inquiry on:	Could not be reached. MEW will ensure that Governor is contacted and engaged during the preparatory phase of this project.

Stakeholder Name	Justification for Engagement during Review Phase	Means of Communication / Information Requested	Summary of Feedback
		Knowledge and records of EHS (pollution) / OHS / community objections related issues	
District Commissioner (قائم مقام) – Minie-Danniyeh	Highest authority in district (Caza) including Deir Ammar Village with Power Plant (PP)	Telephone Inquiry on: Knowledge and records of EHS (pollution) / OHS / community objections related issues	Has confirmed that there are no grievances or complaints raised against the power plant.
District Commissioner (قائم مقام) – Zgharta –	Highest authority in adjacent district (Caza) that includes villages directly adjacent to Deir Ammar Village with PP	Telephone Inquiry on: Knowledge and records of EHS (pollution) / OHS / community objections related issues	Has confirmed that there are no grievances or complaints raised against the power plant.
Municipality of Beddawe – Mayor –			Stated that a complaint has been filed to Ministry of Environment (MoE) a few years ago (5 or 6 years ago approximately) regarding the air emissions from the power plant. No additional details or proof about the issue was provided.
Municipality of Beddawe – Member	Village adjacent to Deir Ammar Village including PP	Telephone Inquiry on: Knowledge and records of EHS (pollution) / OHS / community objections related issues	<ul style="list-style-type: none"> Lebanese army member (whom is also a community member) drowned a few months ago after getting sucked by the sea water inlet to the power plant while he was off duty spearfishing. Can check with local fishermen who practice fishing near the power plant. Could not find any official copies of any complaint submitted by the Municipality to MoE
Municipality of Deir Ammar	Village including Power Plant	Telephone Inquiry on:	Could not be reached

Stakeholder Name	Justification for Engagement during Review Phase	Means of Communication / Information Requested	Summary of Feedback
		Knowledge and records of EHS (pollution) / OHS / community objections related issues	
Municipality of Minieh	Village almost adjacent to Deir Ammar Village including PP but extending along a considerable distance (4.6 km) downwind from the PP starting from 1.2 km until 5.8 km	Telephone Inquiry on: Knowledge and records of EHS (pollution) / OHS / community objections related issues	Could not be reached
Municipality of Mejdlaya	Village adjacent to Deir Ammar Village including PP	Telephone Inquiry on: Knowledge and records of EHS (pollution) / OHS / community objections related issues	Could not be reached
NGOs and Civil Society Groups			
Marine Biodiversity / Protection NGOs	Interest group	Telephone Inquiry on: Observations supporting marine pollution from the power plant (cooling water effluent and wastewater discharges) / decline of quality/quantity of fisheries stocks	No details available on local marine biodiversity.
Akkarouna	Interest Group Active in the entire North region (Akkar included) and supports vulnerable groups, including women and refugees. The NGO works under five pillars: Shelter, Protection, Governance, Livelihood and Social Stability. Two years ago, an	The director of the NGO Akkarouna was contacted over the phone on the 2nd of February 2022 in order to ask if they could provide support during different project phases and mainly in stakeholder engagement activities in the region and especially with vulnerable groups	Akkarouna is ready to assist in the project by supporting the access of information to local communities and vulnerable groups of any age and gender, in organizing and delivering focus group meeting and preparation of information briefs. The NGO is also ready to serve as a referral pathway to Gender Based Violence and sexual harassment. Akkarouna have a "hotline" number that can be used by the

Stakeholder Name	Justification for Engagement during Review Phase	Means of Communication / Information Requested	Summary of Feedback
	emergency response unit was established		local community, and they are within the referral mechanism.
Trade unions / Cooperatives / Syndicates			
Cooperative for Fishermen - Tripoli	Interest group	Telephone Inquiry on: Observations supporting marine pollution from the power plant (cooling water effluent and wastewater discharges) / decline of quality/quantity of fisheries stocks	<ul style="list-style-type: none"> The impact of the power plant on fish needs a detailed scientific study. However fishermen in the area are noticing a decline in fish populations in the area. Not certain if the cooling water discharged into the sea affects marine life. The main impact comes from the discharge of untreated WW into the sea from the area. The entire area is not served by wastewater treatment plants and therefore it can be assumed that all sewage generated in the area is discharged untreated in the sea.
Affected Communities and Social Welfare Resources			
Minieh Governmental Hospital	Sensitive receptor downwind in Minieh Village	Telephone Inquiry on: Indications of air pollution related diseases in medical history of local population suggesting Power Plant as a source	It is possible that the increased rates of people suffering from allergy, asthma, cancer, and Chronic obstructive pulmonary disease (especially in areas located downwind) are due to the emissions from the power plant. However, this needs to be thoroughly studied.
Rawda Public School (Principle)	Sensitive receptor 290 m south of PP stacks (prevailing wind is southwesterly)	Telephone Inquiry on: <ul style="list-style-type: none"> Observations supporting air pollution 	<ul style="list-style-type: none"> The school has around 350 students. Around 4 students in each class suffers from asthma.

Stakeholder Name	Justification for Engagement during Review Phase	Means of Communication / Information Requested	Summary of Feedback
		<ul style="list-style-type: none"> Indications of air pollution related diseases in medical history of staff / faculty / students 	<ul style="list-style-type: none"> She noticed increased cancer rates in the area surrounding the power plant but there is no information to ascertain whether this is directly attributed to the power plant. There are many other sources of air pollution in the region extending between Deir Ammar and Tripoli (upwind) (DAPP2 Prelim. EIA): Traffic, ships (port), car painting, furniture painting, landfill, ready mixed concrete plant, building construction, dust (geological) suspension from paved roads, fishing boats, unpaved unfenced parcels, road surface erosion, furniture manufacturing, and petrol transfer from tanks to road trucks, electrical power generators, and domestic heating. The main source of NOx other than DAPP would be the main Tripoli-Akkar Road separating DAPP from Deir Ammar village. The school suffers from vibration impacts (when the power plant is operational). They sometimes smell gas odors at the school, but she is not certain if this originates from somewhere else. She lives nearby as well, and noticed the weathering of her balcony tiles following winter rain.

Stakeholder Name	Justification for Engagement during Review Phase	Means of Communication / Information Requested	Summary of Feedback
Deir Ammar Technical Institute	Sensitive receptor 290 m south of PP stacks	Telephone Inquiry on: <ul style="list-style-type: none"> Observations supporting air pollution Indications of air pollution related diseases in medical history of staff / faculty / students 	Did not accept to talk stating that they need an approval from the Directorate of technical education to do so.
Al Marba Abd el Hadi Al Duhaibi Public School	Sensitive receptor 320 m south of PP stacks	Telephone Inquiry on: <ul style="list-style-type: none"> Observations supporting air pollution Indications of air pollution related diseases in medical history of staff / faculty / students 	Could not be found
Other Affected Parties			
Piscine Aramen Beach Resort	Adjacent receptor to PP	Telephone Inquiry on: <ul style="list-style-type: none"> Indications of associated air pollution suggesting Power Plant as a source Indications of air pollution and marine water pollution and of associated diseases in medical history of staff suggesting Power Plant as a source Observations supporting marine pollution from the power plant (cooling water effluent and wastewater discharges) 	Contact number could not be found.
Academic Institutions			
Balamand University – Institute of Environment	Research/source of scientific data	Telephone Inquiry on: <ul style="list-style-type: none"> Findings supporting marine pollution from the power plant (cooling water effluent and wastewater discharges) 	There are no available studies on the marine environment near the power plant.

Table 2-2. Summary of consultations with local communities

Stakeholder category	Number/gender of stakeholders interviewed	Main concerns on possible restrictions on the use of the RoW	Communication pathways	Environmental, social and safety concerns	Grievance Mechanism uptake channels	Additional comments/ concerns
Mhammara						
Municipality of Mhammara	2 males	<ul style="list-style-type: none"> The RoW is used mainly for agricultural purposes Some structures are being established along the pipeline's RoW (nothing permanent) 	<ul style="list-style-type: none"> Establishing a committee at the municipality that supports access of information to local communities Using posters Through WhatsApp groups Inviting the concerned people to the municipality to communicate the main restrictions that will be imposed 	<ul style="list-style-type: none"> The pipeline crosses agricultural areas and could cause vegetation poisoning The gas pipeline is in close proximity to the oil pipeline that leaks and therefore could cause accidents and affect people's safety Water networks could damage the gas pipeline 	<ul style="list-style-type: none"> Through the committee that can be established at the municipality Through WhatsApp groups 	<ul style="list-style-type: none"> Safety measures should be put in place to avoid accidents Waste is being dumped on the RoW which can affect the pipeline's integrity The RoW should be supervised to limit activities that affect the pipeline's integrity, and the exact location of the water networks should be identified.
Vulnerable Groups: Refugee	1 male	<ul style="list-style-type: none"> Stores and agricultural areas are located on the RoW If restrictions related to permanent structures located on the RoW were imposed (mainly of the houses located along the RoW), affected people should be offered a compensation 	<ul style="list-style-type: none"> WhatsApp groups 	<ul style="list-style-type: none"> Not concerned about any potential impact on the environment, society and safety 	<ul style="list-style-type: none"> WhatsApp groups 	

Stakeholder category	Number/gender of stakeholders interviewed	Main concerns on possible restrictions on the use of the RoW	Communication pathways	Environmental, social and safety concerns	Grievance Mechanism uptake channels	Additional comments/ concerns
Community located along the pipeline's RoW	1 male	<ul style="list-style-type: none"> Owns a vegetable shop on the RoW No specific concerns regarding any restriction that might be imposed on the RoW 	<ul style="list-style-type: none"> WhatsApp groups 	<ul style="list-style-type: none"> The project presents a positive impact as long as safety measures are implemented 	<ul style="list-style-type: none"> WhatsApp groups 	
Sammounyeh						
Vulnerable Groups: Refugee women, men and elderly	10 refugees including 7 women, 2 elderly (males) and 1 man	<ul style="list-style-type: none"> The RoW is used for agricultural purposes Residential units are located on the RoW Most of the refugees work in the agricultural area and hence restrictions on agricultural activities can affect the people's livelihood. Therefore, the affected people should be compensated 	<ul style="list-style-type: none"> WhatsApp groups or verbally over the phone 	<ul style="list-style-type: none"> Gas leaks could occur in case the pipeline was damaged and can hence affect the vegetation and generate odors An explosion could occur 	<ul style="list-style-type: none"> WhatsApp groups 	
Chir Hmairine						
Municipality of El Aabboudiye – Chir Hmairine	1 male	<ul style="list-style-type: none"> Agricultural areas and around five houses are located on the RoW 	<ul style="list-style-type: none"> WhatsApp groups 	<ul style="list-style-type: none"> The project does not have a negative impact as the pipeline is underground and safety measures are implemented 	<ul style="list-style-type: none"> WhatsApp groups 	

Stakeholder category	Number/gender of stakeholders interviewed	Main concerns on possible restrictions on the use of the RoW	Communication pathways	Environmental, social and safety concerns	Grievance Mechanism uptake channels	Additional comments/ concerns
Vulnerable Groups: Low income population living on the RoW (including women)	3 in total including 2 women and 1 man	<ul style="list-style-type: none"> Residential units and agricultural areas are located on the RoW Concerns regarding the possibility of resettlement 	<ul style="list-style-type: none"> Meetings can be conducted at the municipality and information should be communicated verbally 	<ul style="list-style-type: none"> The occurrence of gas leaks can affect people's safety The gas pipeline is in close proximity to the oil pipeline. This oil pipeline is being ruptured by people for the purpose of stealing which is causing leakage and this can potentially affect the gas pipeline An explosion could occur in case the pipe was damaged hence, regular maintenance should be conducted 	<ul style="list-style-type: none"> Through the municipality 	The RoW should be constantly supervised to prevent any activities that can affect the pipeline's integrity and people's safety
Minieh						
Municipality of Minieh	1 male	<ul style="list-style-type: none"> The RoW is used for agricultural and residential purposes 	<ul style="list-style-type: none"> Through the municipality 	<ul style="list-style-type: none"> The project does not have any potential negative impact on the environment, society and safety 	<ul style="list-style-type: none"> Through the municipality 	The oil installations are limiting the establishment of permanent and temporary structures on the RoW
Vulnerable Groups located on the RoW: Women	1 female	<ul style="list-style-type: none"> Owens a perfume store located on the RoW and other stores are also located on the RoW 	<ul style="list-style-type: none"> Through social media 	<ul style="list-style-type: none"> Gas leaks could cause health issues 	<ul style="list-style-type: none"> Whatsapp Groups 	

Stakeholder category	Number/gender of stakeholders interviewed	Main concerns on possible restrictions on the use of the RoW	Communication pathways	Environmental, social and safety concerns	Grievance Mechanism uptake channels	Additional comments/ concerns
Vulnerable Groups located on the RoW: Refugees	1 male	<ul style="list-style-type: none"> Owns a Kiosk located on the RoW Stores and residential units are found on the RoW Compensation should be offered in case restrictions were imposed on the operation of the kiosk during project implementation 	<ul style="list-style-type: none"> Information and restrictions should be communicated verbally and in person 	<ul style="list-style-type: none"> Gas leaks could occur 		

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation.
- **Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in a culturally appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns and for ensuring successful project implementation.
- **Inclusiveness and sensitivity:** stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are encouraged to be involved in the consultation process, to the extent the current circumstances permit. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women and people with disabilities.

For the purposes of effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

3.1 AFFECTED PARTIES

The following groups are most likely to be affected by the project given their presence within the area of influence of the project (near Deir Ammar power plant and/or along the Right of Way of the gas pipeline):

- **Municipalities and Union of Municipalities:** responsible for local governance; any decision to clear the pipeline Right of Way (ROW) should be coordinated with local authorities. The following municipalities and localities bordering the ROW were identified: Al Abboudiyeh, Tell Aabbas, El Haissa, Bellanet el Hissa, Es Sannounye, Quaabrine, Kfar Melki, Qoubbet Chamra, El Aaabde, El Mhammara, Bhannine, El Heqr, and Abou Hamad and El Minieh;
- **Northern Fishermen Cooperative - Tripoli:** Cooperative generally take care, in part, of the marketing of the fish. At major landing sites fish is being marketed through an auction. These sales are recorded by the cooperative (species, price, quantity);
- **Gas pipeline host communities:** the gas pipeline crosses a number of villages and municipalities (Al Abboudiyeh, Tell Aabbas, El Haissa, Bellanet el Hissa, Es Sannounye, Quaabrine, Kfar Melki, Qoubbet Chamra, El Aaabde, El Mhammara, Bhannine, El Heqr, and Abou Hamad and El Minieh) and indicated in Figure 3-1; members of these communities could have a negative impact on the integrity of the pipeline in case they conduct non-permissible activities (that are to be defined by TOIL) along the ROW; nearby communities could also be impacted in the case of a major accident resulting from health and safety risks associated with a loss of containment and ignition of natural gas; therefore it is of utmost importance that strong communication channels be maintained between the project owners and these local communities;
- **General public using the maritime domain near the power plant:** the seawater intake system of the power plant is an important hazard present in the maritime domain and the general public that might be using this domain for recreational or other purposes need to be aware of the hazard to avoid injuries and fatalities that could be associated with its presence.

For Component 2:

- **Local communities in supported jurisdictions:** local communities are expected to benefit from a more reliable and cost-effective water supply schemes in the areas where projects are implemented.

3.2 OTHER INTERESTED PARTIES

Considering previous studies relevant to the use of natural gas for energy, the following stakeholders are considered to be of primary relevance given their interest and influence on the project³ for Component 1:

- **Electricité du Liban (EDL):** responsible for generation, transmission and distribution of electricity in Lebanon; is also owner of Deir Ammar Power Plant;

³ UNDP – ILF Business Consult GmnH (2016), Sustainable Oil and Gas Development in Lebanon, "SODEL", Cost benefit Analysis for the use of Natural Gas and Low Carbon Fuels, Final Report.

- **Lebanon Oil Installations (LOI) – Ministry of Energy and Water (MoEW):** responsible for downstream activities in the hydrocarbon sector; responsible for regulating the import, storage, distribution and use of hydrocarbons in Lebanon as well as related infrastructure;
- **Ministry of Environment (MoE):** responsible for the protection of the environment, has major interest in fuel switching of various sectors to cleaner fuel, e.g. natural gas. Such switch would have significant contribution in improving air quality in Lebanon and reducing GHG emissions contributing to the achievement of Lebanon's commitments towards the Paris Agreement of the United Nations Framework Convention on Climate Change (UNFCCC). MoE would be a major supporter of the project and could drive policies to promote the use of natural gas as the primary fuel for all Power Plants in Lebanon, including Deir Ammar and also the increase in renewable energy as part of Component 2; MoE is however also responsible to ensure the facility complies to national environmental legislation and standards;
- **Climate Change Unit (CCU) at the Ministry of Environment:** the CCU has lead the preparation of Lebanon's Intended National Determined Contribution (INDC) to the UNFCCC in 2015 and its update in 2020; the INDC identifies the fuel switch from diesel to natural gas in the power sector as a critical activity to achieve its unconditional Greenhouse gas (GHG) emission reduction targets by 2030;
- **Ministry of Finance (MoF):** responsible for management of the financial resources and for the fiscal policies in Lebanon; any policy that can affect the revenues of the central government needs to be approved by the MoF;
- **Ministry of Defense/Lebanese Armed Forces/Civil Defense:** responsible for handling emergencies especially in the case of major accidents such as explosions;
- **Disaster Risk Reduction (DRR) unit at Prime Minister Office:** DRR supports ministries, regional governments and local authorities in disaster risk prevention, response and recovery;
- **Operator of Deir Ammar Power Plant (PrimeSouth):** Primesouth Lebanon s.a.l., established in February 16, 2016, being a sister company of Primesouth L.L.C., a US based company, is currently implementing a five-year contract with Electricité Du Liban (EDL) for the operation and maintenance of Deir Ammar power plant. Primesouth Lebanon s.a.l. currently includes a total of three hundred employees (65% engineers and highly qualified technicians).
- **Operation and Maintenance Contractor for AGP (TGS):** TGS (GASCO) has signed an agreement with MEW to conduct needed repairs on AGP and handle the maintenance and operation of the pipeline. TGS will mobilize a number of expat staff (< 10) and nationals (< 10) to operate and maintain the pipeline with the support of Tripoli Oil Installations Lebanon, which is the local LOI Department. TGS will provide accommodation for its expat staff by renting residences / flats nearby.

For Component 2, the following stakeholders are identified as interested parties:

- **Regional Water Establishments (RWE):** these are subordinate entities to MEW and are responsible for water supply in the Lebanese governorates;
- **Litani River Authority (LRA):** LRA is responsible for the management of the Litani River Basin;

- **Mount Lebanon Water Establishment:** this water establishment is directly responsible for the operation of the Hrache-Jeita hydropower plant which shall be rehabilitated as part of Component 2.2;
- **Local authorities:** Depending on the water supply schemes that will be supported by this component, local authorities could eventually be direct beneficiaries, as some local authorities provide water supply to their communities;
- **United Nations Development Programme (UNDP):** UNDP will have a direct role in the implementation of Component 2.

Civil society and nongovernmental organizations, as well as academic institutions, may have in-depth knowledge about the environmental and social characteristics of the projects areas and the nearby populations, and can help play a role in identifying risks, potential impacts, and opportunities to consider and address in the assessment process. Most important, active NGOs can play an important role in awareness raising and building safety culture among the communities located along the pipeline and near the power plant. Other parties can also provide critical support in the case of accidents and for emergency response. The following organizations were identified as “other interested parties”:

- **Lebanese National Council for Scientific Research (LNCSR)** is a national research institution that can contribute to scientific data to the various environmental and social safeguard instruments. The National Center for Marine Sciences (NCMS) might have also useful information related to the thermal discharge area of the power plant.
- **Issam Fares Institute/ Energy Policy and Security Program** is an interdisciplinary platform to examine the intersection of energy and security in the Middle East region. The Program closely monitors the changing energy landscape in the region. It also aims to inform policy makers and the public on the challenges and opportunities of the shift towards alternative energy sources with a focus on nuclear power.⁴
- **Lebanese Oil and Gas Initiative (LOGI)** is an NGO actively working to enhance governance in the oil and gas sector. After the Beirut blast, the NGO initiated a campaign to raise awareness on prevention of major accidents; LOGI is an excellent candidate to support MoEW and TOIL to raise awareness on safety along the pipeline route and near the power plant.
- **Diaries of the Ocean** is an NGO established to build awareness about ocean protection and marine conservation. It is a good candidate to support the project proponents in awareness raising along the coastline near the power plant and to support fishermen and other vulnerable groups that could be negatively affected by the discharges of the power plant in the marine environment.
- **Fondation Diane** is an NGO that is very active in the environmental field, including waste management and renewable energy.
- **Palm Island Nature Reserve** is located in North Lebanon, near the city of Tripoli and is a declared Protected Area.

⁴ <https://www.aub.edu.lb/ifi/Pages/energy-policy-and-security.aspx>

- **Institute of the Environment (IoE) – Balamand University** is a leading research institution in North Lebanon with a particular focus on the marine environment and working with fishermen; IoE can be an academic partner supporting stakeholder engagement activities with scientific and technical support.
- **The Lebanese Red Cross** is an NGO that provides support in case of emergencies and accidents.
- **Beirut Bar Association** can provide voluntary legal support to disadvantaged groups in case of an appeal in relation to a raised grievance.

Additional NGOs and stakeholders relevant to Component 2 addressing renewable energy include:

- **The Lebanese Association for Energy Saving & for Environment (ALMEE)** is involved in a wide range of activities related to sustainable practices and other “green” issues. The association describes itself as “a non-political & non-profit association” committed to better handling of multiple issues and technologies associated with Energy and Environment such as renewable energy sources and techniques like cogeneration that lessen the waste associated with power generation and industrial processes.⁵
- **Lebanese Center for Energy Conservation (LCEC)**. A subsidiary of MEW that works with the Ministry to set action plans and national strategies for energy efficiency and renewable energy deployment⁶.
- **Lebanese Solar Energy Society (LSES)** is an NGO promoting Renewable Energy.

The following organizations were identified as potential entities to raise the viewpoints of disadvantaged/vulnerable individuals or groups and also to ensure access to these vulnerable groups so they these can be engaged as part of this SEP:

- **Abaad** is an NGO that aims to achieve gender equality as an essential condition to sustainable social and economic development. Abaad advocates for the development and implementation of policies and laws that enhance women’s effective participation, through a rights-based approach that would bring about tangible change to gender justice⁷.
- **Akkarouna** is a local non-profit NGO that is managing 3 offices in the Northern Region of Lebanon, Namely in Akkar, Tripoli and Baddawi. Its aim is to achieve sustainable socio-economic growth through youth, women and children empowerment by building their capacities, enhancing community networks, implementing development projects and spreading awareness about rights and citizenship under 5 pillars: Shelter, Protection, Social Stability, Livelihood and Governance⁸.
- **Akkar Network for Development in Akkar (AND)**. This local CSO envisions itself as an expression of a unified vision of the region, and a common perspective of the civil society’s

⁵ <https://www.almeelebanon.com/>

⁶ <https://www.lcec.org.lb/>

⁷ <https://www.abaadmena.org/about>

⁸ <https://www.akkarouna.com>

role as an agent of socio-economic change in Akkar and aims to look into the region's needs and work with civil society, local authorities and Akkar community at large and to ensure the creation of a development policy for Akkar.

- **Ibdaa w Najah.** This NGO is based in sahel Akkar with multiple years of experience implementing youth empowerment and local development initiatives in various communities. Ibdaa w Najah's mission is to support youth development across different areas of life (science, economy, health, environment and technology) and build a civilized society at the service of its members.

3.3 DISADVANTAGED / VULNERABLE INDIVIDUALS OR GROUPS

Component 1 is implemented in one of the poorest regions in Lebanon, including the Akkar Governorate and North Lebanon governorate where the gas pipeline crosses. The area also includes several Palestinian refugee camps and is also known to have major host communities for Syrians displaced at the start of the Syrian war in 2011. Farmers and fishermen are also active in the project implementation area and some can be disadvantaged due to their socio-economic status or literacy levels. The region is also known to observe amongst the largest unemployment rates in Lebanon, which were further exacerbated by the current financial and economic crisis.

Lebanon is also known as a largely patriarchy society, particularly in these poorer areas in North Lebanon, where women are expected to be largely disadvantaged when it comes to provide its views, raise a grievance or have a role in the household. Youth also generally has less ability to actively express opinions and be engaged in the society in these regions. The same applies to the elder whom are disadvantaged due to their age and physical limitations. It is important to note that the vulnerability of these groups is not expected to be increased or negatively affected by the project. On the contrary, by providing better access to electricity, the project is expected to have positive impacts on their socio-economic status.

The main issue is to ensure these groups have access to information, especially when it is related to emergency response, permissible and non-permissible activities along the pipeline's ROW, and any other important safety information that will be derived from the safety studies. In case of accidents, these groups would have less ability to recover to their original status. In summary, these groups include:

- Households in the poorest quintile near the pipeline's ROW (and within safety distances to be identified in safety studies)
- Refugees in camps and in host villages
- Fishermen near the power plant and farmers along the pipeline's ROW (and within safety distances to be identified in safety studies)
- The unemployed
- Women

- Youth and the elder

NGOs identified in Section 3.2 will be engaged as part this SEP to support MEW/TOIL/EDL to reach out to these groups and provide information about risks associated with the gas pipeline, as well as instruct them about the permissible and non-permissible activities along its ROW. Once more, the project is not expected to affect their livelihoods in normal operations except during accidental events. This will be further assessed as part of the preparation of the ESMPs and safety studies.

These groups will most likely need to be contacted through direct means and meetings as they do not have access to internet and parts of could be illiterate. This is where NGOs will play an important role to support engagement with these groups.

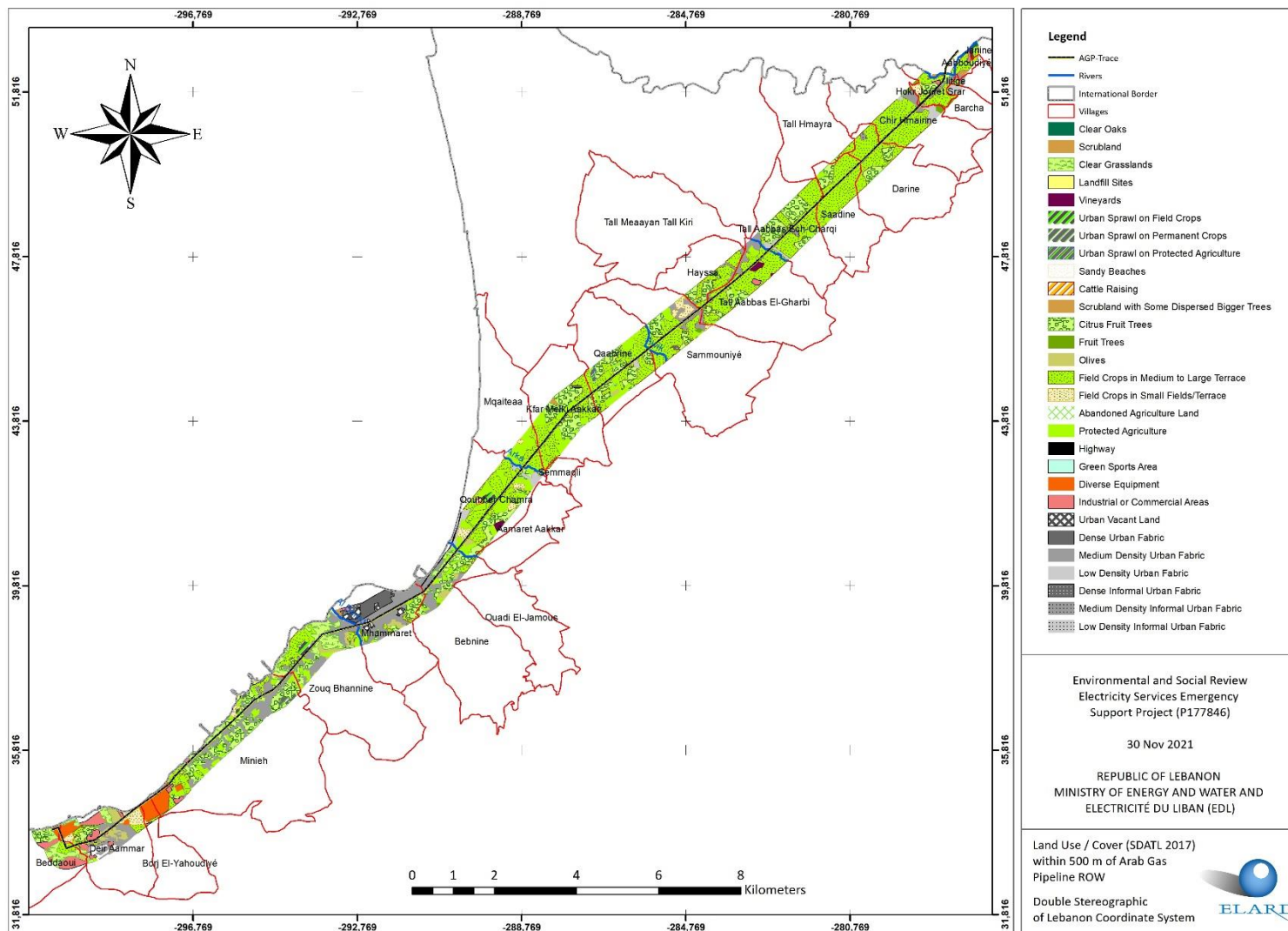


Figure 3-1 Land Use/Cover within 500 meters of Arab Gas Pipeline ROW in Lebanon (source: SDATL, 2017)

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1 PURPOSE AND TIMING OF STAKEHOLDER ENGAGEMENT PROGRAM

The main goal of the Stakeholders consultations and engagements is to ensure stakeholders, and particularly local communities along the gas pipeline route and near the powerplant are aware of the risks associated with living near a live hydrocarbon system as well as of the permitted and non-permitted activities within and along the gas pipeline ROW. A blast area will also be defined as part of risk studies, and if applicable, communities living within a blast area should be informed of the risks. Last but not least, communities benefiting from marine resources near the power plant or using the maritime domain for recreational or other purposes should also be closed engaged and informed.

This draft SEP will be disclosed prior to Project appraisal and following consultation with the identified stakeholders. As the SEP is a living document, it will be updated periodically and as necessary as agreed with the Bank. The programme proposed in Table 4-1 includes the proposed timing of the various engagement activities. Disclosure of ESR, ESCP and this SEP is expected to be held during January 2022. Additional engagements with several target groups will be held during both preparation and review phases of the various safeguard documents to be prepared. Dates cannot be confirmed until a schedule for the project activities is fixed. Stakeholders will be made aware of these events through various means as identified in Table 4-1, including through the support of local NGOs who can help reach-out to local communities and vulnerable groups.

Last but not least, the principle of proportionality will be applied in the implementation of this SEP whereby local communities and stakeholders, including identified vulnerable groups, where risks are higher (eg. Mhammaret area where densely populated areas are located near the pipeline), will be engaged more frequently and more intensely than in areas with less risks and impacts from the project. Outcomes of the risk studies are very important to further guide stakeholder engagement activities. This SEP will be updated during the preparation of the ESMP and risk studies.

4.2 PROPOSED STRATEGY FOR INFORMATION DISCLOSURE

This section describes what information will be disclosed, in what formats and the types of methods that will be used to communicate this information to each of the stakeholder groups.

Table 4-1. Proposed strategy for information disclosure

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
During Project Preparation and before testing and commissioning	<p>SEP including Grievance Mechanism and GBV referral pathways E&S review and ESCP ESMP (for power plant and GASYLE)</p> <p>Citizen engagement platform</p> <p>All documents to be disclosed with executive summary in Arabic</p> <p>Where the information can be found should be clearly communicated (refer to methods proposed)</p>	<p>Posting of documents on the websites of MEW, TOIL, EDL and the World Bank.</p> <p>Notification via newspapers (including mobile app newspapers) of availability of documents for review including link to download the documents.</p> <p>Hard copies of the documents will be made available at the identified municipalities near PP and along GASYLE</p>	<p>December 2021/January 2022. Documents to be disclosed for a period of 30 days.</p>	<p>Affected parties and interest parties. Vulnerable</p> <p>Women-only groups</p> <p>Refugees</p> <p>Other vulnerable groups (elder, youth, illiterate, unemployed, and people below poverty line)</p>	<p>MEW/TOIL/EDL</p> <p>It is highly recommended that the identified NGOS be engaged to support in disclosure process and access the target groups.</p>

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
During Project Preparation	Same as above	Series of targeted focus group discussions with affected parties including vulnerable groups, women-only groups, youth, refugees. If need for resettlement is identified following conclusion of risk studies ⁹ , include specific meetings with directly affected persons	January 2022	Affected parties/vulnerable groups	MEW/TOIL/EDL It is highly recommended that the identified NGOs be engaged to support in disclosure process.
During Project Preparation	Post-Disclosure report documenting all stakeholder's concerns and feedback received during the public disclosure period, and how the project responds to them, including NGOs and civil society groups	Disclosure on MEW/TOIL/EDL websites and print-outs at identified municipalities (Arabic version) Direct reporting back to illiterate groups	February 2022 to be available for a minimum of 2 years every 6 months	Affected parties	MEW/TOIL/EDL with support of NGOs

⁹ A Quantitative Risk Assessment (QRA) will be performed and results should be available by March 2022; based on the results, risks will be quantified, and decisions related to the need for resettlement can be made.

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
Prior to testing and commissioning	Permitted and Non-permitted activities with ROW of GASYLE and information on potential blast impact areas	Preparation of infographics and leaflets that are easily understandable and accessible to the local communities and authorities and vulnerable groups Dissemination via social media and community meetings	Spring 2022 to be permanently available and updated as needed	All stakeholders and especially potentially affected parties	MEW/TOIL/EDL It is highly recommended that the identified NGOs be engaged to support in disclosure process.
During Project preparation	Safety zone around seawater intake area of the Deir Ammar power plant	Physical notification in the maritime domain through visible and other acceptable means (like buoys) Preparation of infographics and leaflets	Immediately as intake is operational	Public at large and Users of maritime domain near intake area Cooperate of fishermen Relevant NGOs	MEW/EDL

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
Prior to start of repair and rehabilitation stage	Provide information associated with the start of repair and rehabilitation activities of the gas pipelines	<p>Official letters of notification, leaflets, advertisements available in both English and Arabic.</p> <p>MEW/TOIL/contractor website, public meetings, mass media, local noticeboards and noticeboards at the premises of municipalities.</p>	At least 4 weeks prior to start of activities	All stakeholders and particularly potentially Affected parties	MEW/TOIL/ Contractor
During repair and rehabilitation stage	Keeping stakeholders informed on any project or repair-related activities that might affect them, including temporary road closures, diversions or changes to the planned schedule.	<p>Official letters of notification, leaflets, advertisements available in both English and Arabic.</p> <p>MEW/TOIL website, contractor website, public meetings, mass media, local noticeboards and noticeboards at the premises of municipalities.</p>	Throughout repair/rehabilitation period	All stakeholders and particularly potentially Affected parties	MEW/TOIL/ Contractor

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
At the end of repair and rehabilitation activities	Disclose information on the project's environmental and social performance during repair/rehabilitation activities.	Environmental and Social Performance Report ¹⁰ available in both English and Arabic. Disclosure at MEW/TOIL and contractor's website	At the end of repair/rehabilitation period	All	MEW/TOIL/ Contractor
During operation	Disclose information on the project's environmental and social performance, including safety, during operation phase, and mitigation/remedial actions taken.	Environmental and Social Performance Report available in both English and Arabic. Disclosure at MEW/TOIL/EDL and operators websites	Every 6 months	All	MEW/TOIL/EDL/ Operators

¹⁰ This report provides information on KPIs and overall environmental and social performance of the project

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
During operation	Stakeholder perception surveys	Questionnaires to be administered to local communities to understand their level of awareness of project risks, permissible and non-permissible activities and their level of compliance.	Every 12 months	Affected parties including vulnerable groups	MEW/TOIL/GASYLE operator
During Operation	Emergency preparedness and response plans	Prepare infographics and leaflets to be used for regular information to local communities Training and drills	Every 12 months	Affected parties including vulnerable groups Communities within identified safety distances	MEW/TOIL/EDL/ Operators

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
During preparation phase for Component 2	ESMF ESMP	Disclosure in MEW website Focus groups meetings to discuss findings of ESMF (component 2.1) and ESMP (component 2.2) and collect inputs prior to their finalization	TBC	All	MEW

4.3 PROPOSED STRATEGY FOR CONSULTATION

Methods used for consultation and disclosure are provided in Table 4-1 and includes a variety of methods:

- Online methods
- Surveys, polls, and questionnaires
- Public meetings, workshops, and/or focus groups on specific topic
- Use of newspapers and mass media
- Notifications at municipalities

It is highly recommended to engage with NGOs to support MEW/TOIL/EDL in the engagement activities.

A consultation workshop with NGOs is proposed to be conducted in January 2022 to present the project activities and SEP and identify those NGOs with the necessary resources to support its implementation.

4.4 PROPOSED STRATEGY TO INCORPORATE THE VIEW OF VULNERABLE GROUPS

The project foresees to carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs in terms of accessing information and other challenges they are faced with. The details of strategies that will be adopted to effectively engage and communicate to vulnerable group will be considered during project implementation.

As stated above, considering the specific scope of this Project, vulnerable/disadvantaged groups at this stage can be identified to be mainly women and low-income population, and illiterate population. In order to ensure those groups are adequately involved in the project, specific engagement methods will be applied. Since the mentioned groups are cross-cutting throughout all different stakeholder groups the envisioned methods are being applied throughout consultations with any of the listed stakeholders. Those methods include:

- Women-only consultation sessions (for women as part of the communities or NGOs)
- Consultation sessions dedicated to vulnerable groups
- Diversification of outreach methods beyond digital media, such as through the radio or poster campaigns to reach low-income population

4.5 TIMELINES

Timelines are defined in Table 4-1.

The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project including any feedback received

from them that support successful project implementation. The methods of engagement will also be revised periodically and as needed to maintain their effectiveness and relevance to the project's evolving environment.

4.6 REVIEW OF COMMENTS

Communication and feedback from stakeholders will be taken into consideration at each stage of this project. The stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism. This will be done through the publication of post-disclosure documents but also via direct meetings with vulnerable groups including the illiterate with the support of NGOs.

4.7 FUTURE PHASES OF PROJECT

All stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism. MEW/EDL/TOIL will prepare semi-annual reports regarding environmental and social impacts, grievances and project achievement and will present these to stakeholders.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 RESOURCES

MEW/EDL/TOIL will assign an Environmental & Social Safeguard specialist, housed at the MEW as part of the Project Implementation Unit (PIU) to be in charge of the stakeholders' engagement activities as outlined in this SEP. The E&S specialist to be hired will establish the process in due time. The power plant operator and pipeline operator should also have an E&S specialist in charge of implementing the SEP. The plant should have an external E&S consultant until it has E&S officers or develop the capacity of existing H&S officers to handle E&S aspects.

The Grievance Redress mechanism will be managed by a dedicated Grievance Redress specialist to be part of the PIU.

The budget for the SEP is included in Component 3 of the Project. An estimated budget to implement the SEP until the start of operations of Component 1 is provided below:

- External consultants: USD 20,000
- Graphic design for dissemination and information materials: USD 5000
- Printing of dissemination and information materials: USD 5000
- Transportation, venues and F&B expenses: USD 5000

NGOs are expected to support the process through their own budgets.

During operations, and in addition to the salaries of E&S and GRM specialists at the PIU, and annual budget for SEP implementation is estimated as follows:

- Budget for NGOs support: USD 20,000 (NGOs might be able to mobilize resources from their own funding sources; this will be explored in consultations with NGOs during SEP review in January/February 2022)
- Graphic design / printing of new materials: USD 5,000
- Transportation, venues and F&B expenses: USD 5000
- Cost for drills and training: USD 5,000 (this budget could also be secured with cooperation with the DRR unit)

5.2 MANAGEMENT FUNCTIONS AND RESPONSIBILITIES

MEW E&S manager will be responsible for:

- Approval of all documentation containing project information that will be used for stakeholder engagements, before they are used;
- Approval of the content of this SEP and any subsequent revisions;

- Operation of the grievance mechanism; and
- Preparation of Environmental and Social Performance Reports and their meaningful and widespread disclosure.

They will also be responsible to delegate the below activities to relevant teams:

- Preparing and printing all disclosure and media tools used for the Project;
- Providing information to stakeholders using the disclosure materials;
- The practical and logistical organisation of all stakeholder engagement activities including contacting stakeholders to arrange meeting times/locations;
- The preparation and issuing of all stakeholder engagement invitation letters;
- Attendance/facilitation of all stakeholder engagement meetings/discussions, including room meeting bookings, refreshments, and the recording of all results and issues raised;
- Generating an accurate record of all stakeholder engagement activities and noting any future actions required; and
- Ensuring that stakeholder engagement results are compiled into a summary with the aim of informing the project design.

Repair and rehabilitation contractor and operators shall be responsible for the following:

- Reporting any grievances immediately to MEW in accordance with the grievance mechanism;
- Other responsibilities that shall be defined as the project progresses.

Environmental and Social Performance Reports prepared during repair/rehabilitation and operation of the project shall also include a summary of the engagements completed, during the reporting period and how they have been used to improve performance in the future.

The following metrics will be used for monitoring and improving stakeholder engagement performance:

- At least a bi-annual revision of the SEP to reflect new information;
- Percent completion of tasks in the SEP during the reporting period.
- Number of public consultation events and participants that attended them segregated by gender during the reporting period and cumulatively.
- Number of stakeholders' comments and suggestions received by MEW/EDL/TOIL segregated by gender during the reporting period and cumulatively.
- Number of women-only consultations conducted during the reporting period and cumulatively.

- Number of consultations conducted with vulnerable groups other than women during the reporting period and cumulatively.
- Number of stakeholders' grievances and claims regarding the Project segregated by gender during the reporting period and cumulatively.
- Number of advertisements in mass media during the reporting period and cumulatively.
- Category of complaint (i.e. land acquisition, employment, etc.) raised during the reporting period and cumulatively in percentage of prevalence.
- Percent of grievances resolved within the planned resolution timeline during the reporting period and cumulatively.
- Percent of grievances remaining unresolved within the planned resolution timeframe during the reporting period and cumulatively.
- Number of emergency drills and trainings conducted during the reporting period and cumulatively.

The above metrics will be reported in Environmental and Social Performance Reports prepared during construction and operation.

6. GRIEVANCE MECHANISM

6.1 COMPLAINT MANAGEMENT MECHANISM

Formal complaint management mechanisms are not adopted by the implementing entity (MEW) or its subordinate entities (EDL, TOIL or regional water establishments).

The Deir Ammar Power Plant has in place an informal mechanism for uptake of grievances by surrounding communities which are handled by the plant manager who is under the mandate of the EdL. The grievances are not documented in a formal manner and timelines for handling and closing complaint cases are not specified.

This section summarizes the main steps and procedures of a formal and documented Grievance Redress Mechanism to be followed by the implementing agency throughout the project implementation.

6.2 OBJECTIVES OF A COMPLAINTS MANAGEMENT MECHANISM

The grievance mechanism aims to provide individuals and communities who feel aggrieved by Project activities with accessible, timely, effective and culturally appropriate opportunities to raise their complaints and concerns about the Project. It also aims to identify, propose and implement fair and appropriate solutions in response to the complaints and concerns raised.

Specifically, the objectives are to:

- Establish a system for receiving, recording and processing complaints and concerns in a timely manner with particular attention to vulnerable groups;
- Provide an effective, transparent, timely, fair and non-discriminatory system that would allow aggrieved persons to complain and avoid litigation;
- Encourage the social and amicable settlement of complaints and avoid recourse to the courts as far as possible;
- Minimise bad publicity and avoiding/minimising delays in Project implementation;
- Ensure the sustainability of Project interventions and ownership by stakeholders; and
- Provide clarification in response to requests for information.

6.3 RAISING AWARENESS OF THE GRIEVANCE MECHANISM

The existence of the grievance mechanism will be consistently publicised during all stakeholder engagement activities as described in Section 4 verbally during meetings, focus group discussions and other types of formats as well as through the grievance mechanism leaflet which shall be used to provide a one-page summary of the function of the mechanism, details of the resolution and appeal process, and provide written contact details to raise a complaint.

6.4 TYPES OF COMPLAINTS AND CONFLICTS TO BE DEALT WITH

The types of conflicts/complaints that may arise are as follows:

- Nuisance factors (dust, noise, vibrations);
- Environmental impacts (air pollution, marine pollution);
- Claims related to socio-economic activities (fisheries, agriculture);
- Claims related to restricted use of the pipeline's ROW;
- Health and safety related incidents (injuries during repair and rehabilitation activities of the pipeline);
- Claims related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH);
- Labor-related grievances;
- Claims related to injuries or fatalities from major accidents.

Major incidents need to be reported to the World Bank within 48 hours. All grievances should be given attention and importance, however certain grievances, in addition to injury-related grievances, should be provided urgent attention, particularly SEA/SH-related grievances, labor-related grievances and grievances related to impact on livelihood.

6.5 UPTAKE CHANNELS TO REGISTER GRIEVANCES

A grievance can be raised in the following ways:

- Formal mail, phone call, SMS, or whatsapp to contact details below
- Contact via MEW/EDL/TOIL websites
- Contact via the local municipality
- Contact via designated NGOs that will collect grievances from vulnerable groups and for SEA/SH related grievances; Akkarouna has shown willingness to play this role
- Direct contact with Community Liaison Officers to be appointed by MEW/EDL/TOIL and to be physically present in the project's area

Contacts information will be presented in a grievance mechanism leaflet to be disseminated to local communities and stakeholders. Contact details are included below:

Contact Person	Phone
Mr Tony Taoum	+961 3 667389
Eng. Fadi El-Hassan	+961 3 214409
Elvis Johna	+961 71 191560
Youssef Bubetti	+961 3 074427

A Citizen Engagement platform is also being developed by the project as part of Component 3 and will also serve as an uptake channel for grievances. More details will be provided once the platform is finalized in addition to further contact details. Such information would be included in future revisions of this SEP.

6.6 THE GRIEVANCE MECHANISM PROCESS

The grievance mechanism process consists of the following steps:

1. Registration of complaints and acknowledgement of receipt;
2. Investigation;
3. Responding with a proposed resolution;
4. The opportunity to appeal; and
5. Follow-up and conclusion.

6.6.1 *Registration of complaints and acknowledgement of receipt*

Once information that a grievance has been received is channeled into MEW from whatever source, the Grievance Register (Annex 2) will be updated by the MEW's E&S Manager and the person/entity raising the grievance will be contacted by MEW's E&S Manager or a Community Liaison Officer to request additional information within 3 working days from receipt of the grievance.

The Grievance Register shall immediately be populated by the MEW's E&S Manager with the following information using the Grievance log (Annex 2):

- A unique reference number of the complaint;
- The date and time on which the complaint was lodged;
- How the grievance was first brought to the attention of MEW (uptake channel);
- Information about the complainant (name, gender, telephone number and preferred contact details, their place of residence and address); complainant has the right also to raise the grievance anonymously;
- The use of the referral pathway, if any;
- A brief description of the complaint to include details of the location, people involved so that a timeline of events can be created;
- The category of the complaint;
- Whether it is a major incident and requires reporting to World Bank within 48-hours;
- Time and date in which the complaint was closed/resolved;

- Whether the complainant chose to appeal.

The person raising the grievance shall then be provided with an acknowledgement within three working days from the point the grievance was first raised, in an appropriate manner that reflects their preferred contact details (typically a letter or email), by MEW's E&S manager. The acknowledgement of receipt shall contain information about the next steps in the procedure, target timeframe and the contact details of the person who has been assigned to investigate and manage the grievance.

6.6.2 Investigation

The grievance shall be investigated, and an Investigation Report prepared and issued by the MEW's E&S Manager within 15 working days from registration of the grievance. MEW's E&S manager is responsible to delegate the investigation to relevant personnel based on the type of grievance received. MEW's E&S manager will review the investigation report and approve it prior to sharing with the person/entity raising the grievance.

If the grievance relates to a minor issue, then it is likely that the investigation can be completed in advance of the 15 working days. The investigation shall involve an examination of the circumstances of the case, interviews with the parties involved and consultations with stakeholders. The report shall include details of the proposed steps to be taken to resolve the grievance based upon the facts. If such steps require disbursement of financial resources, the case shall be raised to the PIU's manager for review and appropriate action.

6.6.3 Responding with a proposed resolution

MEW's E&S Manager will inform the person raising the grievance, within 20 working days from the date when the grievance was registered, of the outcome of the Investigation Report and the proposed steps to be taken to resolve the grievance. This shall be conducted through a physical meeting with all persons who are able to be present and while taking all necessary precautions related to COVID-19 in line with World Bank's relevant guidance note. If a physical meeting is not possible, the meeting can be held remotely via means that are accessible to the person raising the grievance.

If the person accepts the resolution steps, then these will be implemented within the agreed timeframe and the person raising the grievance will be requested to sign their acceptance of the proposed solution so that it can be closed in the Grievance Register (Annex 2). As a target, all complaints should be closed within 30 working days from registration of the grievance. Feedback will be requested from the person to check how satisfied they are with the overall resolution of the grievance.

If the person does not accept the resolution steps, then they will be able to appeal (see below).

6.6.4 The opportunity to appeal

If the originator of the grievance is not satisfied with the resolution, he has the right to appeal. In the event that a person wishes to appeal then, MEW E&S manager shall invite the services of an independent party (such as a non-governmental organization, civil society group or independent consultant) and ask them to provide one, or more, representatives to help

mediate the case. At any time during the grievance resolution process, a complainant is able to seek independent legal advice or involve a court of law.

Vulnerable groups will be assisted to raise their grievances to the Beirut Bar Association, which can appoint voluntary lawyers to investigate such claims. NGOs engaged in the project can also play a role in defending legal rights of vulnerable groups.

The E&S manager will assure adequate follow-up of the appeal process to ensure the case is closed as promptly as practicably possible.

6.6.5 Follow-up and conclusion

Once a resolution of the complaint has been agreed or a decision to close the file has been made, the final step will be the implementation of the settlement, the monitoring of the results and the conclusion of the complaint.

Where needed, MEW's E&S manager will prepare a 'lessons learned' document that outlines the steps taken to avoid similar grievances from re-occurring in the future. These shall then be disseminated across the Project and activities through tool-box talks, notice signs, meetings and other activities to work towards improving the Project's environmental and social performance over time.

7. MONITORING AND REPORTING

7.1 INVOLVEMENT OF STAKEHOLDERS IN MONITORING ACTIVITIES

It is recommended that NGOs be involved in stakeholder monitoring activities (refer to Table 4-1). This can be discussed in the NGO's consultation session and a relevant NGO with required competency and resources can be selected for further discussions. Community members such as school head, mayors, fishermen union and head of hospital, consulted during this due diligence, could also be included in monitoring activities.

7.2 REPORTING BACK TO STAKEHOLDER GROUPS

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism.

Where applicable, the SEP will include differentiated measures to allow the effective participation of disadvantaged or vulnerable groups (such as an increased level of resources may be needed for communication with such differently affected groups).

The SEP will be updated regularly (and at least twice a year) to reflect the views of stakeholders.

ANNEXES

ANNEX 1: IDENTIFIED STAKEHOLDERS

Stakeholder
Abaad
Ministry of Environment
AUB/ Issam Fares Institute
Akkarouna
Akkar Network for Development in Akkar (AND).
Ibdaa w Najah
LOGI
Electricité du Liban (EDL)
Lebanon Oil Installations (LOI) – Ministry of Energy and Water (MoEW)
Operator of Deir Ammar Power Plant (PrimeSouth):
Likely Operation and Maintenance Contractor for AGP TGS (GASCO)
Governor of North
District Commissioner (قائم مقام) – Minie-Danniyeh
District Commissioner (قائم مقام) – Zgharta
Municipality of Beddawe
Municipality of Deir Ammar
Municipality of Minie
Municipality of Mejdlaya
Municipality of Bibnine-El Aabdeh
Municipality of Mhammara
Northern Fishermen Cooperative - Tripoli
Minie Governmental Hospital
Al Kheyr Hospital
Rawda Public School
Deir Ammar Technical Institute
Lebanese National Council for Scientific Research (LNCSR)
Diaries of the Ocean
Institute of the Environment (IoE) – Balamand University
The Lebanese Association for Energy Saving & for Environment (ALMEE)

Stakeholder
Lebanese Center for Energy Conservation (LCEC)
Lebanese Solar Energy Society (LSES)



Interviews conducted with vulnerable groups



Pipeline's RoW in Chir Hmairine

ANNEX 2: GM LOG

