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**UPDATE THE ENVIRONMENTAL AND SOCIAL  
IMPACT ASSESSMENT (ESIA) AND DEVELOP THE  
RESETTLEMENT ACTION PLAN OF THE  
PROPOSED RECOVERY AND REUSE SCHEME  
NAMELY THE RECOVERY SCHEME  
INFRASTRUCTURE, THE IRRIGATION NETWORK  
AND THE RELATED ENVIRONMENT**

**Stakeholder Engagement Plan**

**18<sup>th</sup> JUNE 2018**



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## 1 Preamble

### 1.1 Introduction

The Palestinian Water Authority (PWA) together with AfD have prepared the Terms of Reference (ToR) for updating the Supplementary Environmental and Social Impact Assessment (SESIA) carried out for the North Gaza Emergency Sewage Treatment Project (NGESTP) in 2013.

The SESIA update assignment will only cover the evaluation of the environmental and social risks and impacts of the Recovery and Reuse Scheme (part 'C2').

Part 'C1' has been financed by World Bank and this part 'C2' (referred to as **the Project** in this document) is anticipated to be financed by AfD and the Green Climate Fund. The update assignment was announced in a competitive bid and awarded to the joint venture of EcoConServ and UG Gaza.

This report is a fundamental deliverable for the SESIA update consultancy service which involves the update the SESIA, on the components covered by the Project, based on the updated project description, including the Photovoltaic system component (that was not part of the initial project) and with recent information regarding the baseline and institutional context.

### 1.2 Background

The Northern Gaza Emergency Sewage Treatment (NGEST) Project initiated in 2004, was initially planned to be implemented in two phases. Part A of the treatment scheme was the construction of the terminal sewage pumping station at the Beit Lahia Wastewater Treatment Plant site, construction of a pressure pipeline to a new site about seven kilometers to the East of Jabalia, construction of nine infiltration ponds at the new site, and commissioning of the pipeline to allow a large and dangerous emergency partial effluent pond at Beit Lahia to be drained.

Part B of the treatment scheme included constructing a wastewater treatment plant at the new site that was envisaged to handle up to 70,000 cubic meters of sewage daily. Other parts of the overall project was the remediation of the land that was formerly covered by a large partial effluent at Beit Lahia and for a pilot program to recover treated and infiltrated effluent from the ponds.

Part 'A' had been in operation since April 2009, and was entirely completed in 2010, pumping partially treated sewage from the old BLWWTP site to the new infiltration basins site.



Part B was originally expected to be completed in 2013, but had not actually started its operations until the first quarter of 2018.

Part C, was proposed at a later stage, to expand the effluent recovery and reuse scheme to the full planned effluent flow from the plant and provide long-term protection for the underlying aquifer.

In addition to the core project components of C2, an additional new solar component was proposed to secure reliable source of power supply to the project, and reduce its operations dependency on the grid.

The joint venture between EcoConServ and Universal Group were hired by AfD and PWA to update the evaluation of the environmental and social risks and impacts of the Recovery and Reuse Scheme (part 'C2'). The Consultancy Term of Reference (ToR) identified the objective of the study in two parts: "Update the Environmental and Social Impact Assessment (ESIA) and Develop the Resettlement Action Plan of the proposed Recovery and Reuse Scheme, namely the recovery scheme infrastructure, the irrigation network and the related environment.

### 1.3 Project Rationale

The main goal the anticipated effects to the groundwater aquifer for both the interim phase (before the treatment plant is commissioned) and the consequent effects of the full operation of the system. The basic assumption used in those scenarios was that there would be a timelag (around two years) between the two phases when poor-quality effluent will be discharged to the basins. To mitigate those negative effects during this interim phase, the study recommended a recovery scheme where the groundwater “polluted” with the recharged effluent will be arrested through a chain of pumping wells (after its quality has improved) and used for agriculture.

The reality has changed since the EIA was prepared, and the timeframes envisaged for both phases have changed. Due to the closure of the Israeli borders with Gaza and lack of construction materials, phase A has taken more than four years to finish. Phase B was expected to be commissioned before the end of 2013 but has not been in operation until the first quarter of 2018. The effluent lake in Beit Lahia has been evacuated to the basins with sub-standard quality. Until then, inflow rate of partially-treated sewage to the basins was about 15,000 cubic meters daily and the remaining effluent was pumped daily to temporary ponds located near the north border with Israel (northwest Um Al-Nassr) and to the two basins adjacent to the existing BLWWTP.

The reuse/recovery scheme component aims at recovering and reusing the treated effluent after the new WWTP is completed. The system is composed of a chain of 27 recovery wells

surrounding the basins to capture the effluent after it passes through the effluent ponds, storage reservoirs and a distribution network for agricultural reuse. The recovered effluent is expected to irrigate around 15,000 dunums of adjacent agricultural land.

#### 1.4 Project Component Site

The area of the project lies in the vicinity of NGWWTP and is designed to benefit from the recovery water in the agricultural activities. The existing situation of this area is illustrated hereafter according to a study (PWA, 2010) prepared during the NGWWTP effluent recovery system.

The proposed agricultural area for reuse activities is divided into two zones (A and B) according to its location from NGWWTP. Zone A is the part located north of NGWWTP with about 10,100 dunum whereas, Zone B is located south of NGWWTP with about 5,000 dunum.

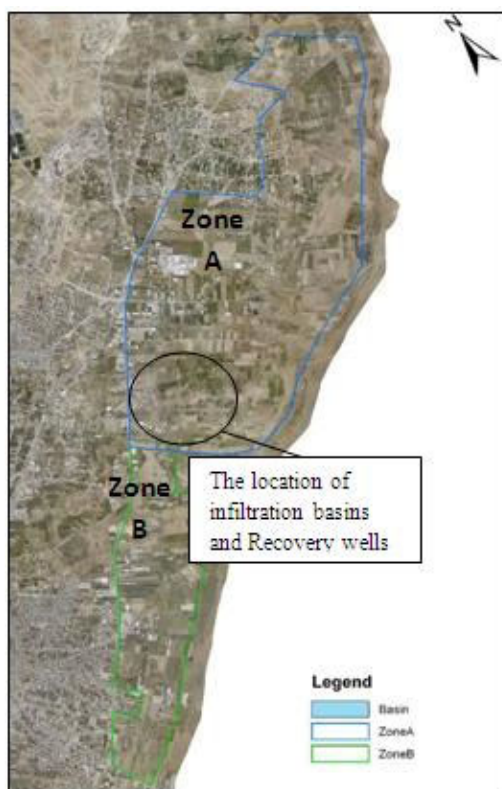


Figure 1-1: Proposed project area

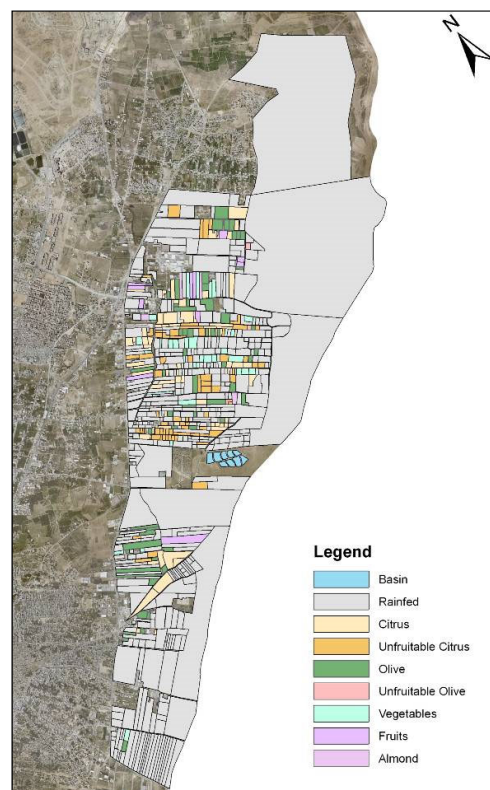


Figure 1-2: Existing crops in the project

## 1.5 Stakeholder Engagement Objectives

The objective of the Stakeholder Engagement is to ensure safe and successful Project delivery by:

- Informing stakeholders, including persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively;
- **Listening** to their comments, ideas and concerns and recording the same for follow up;
- **Communicating and implementing** a viable community grievance mechanism.
- **Avoiding** conflict by addressing impacts and issues raised by stakeholders promptly; particularly with the communities that will not be served by the project
- Ensuring that fears and anxieties about the nature, scale and impact of the operation have been properly considered in the development and management of the Project;
- **Accessing** and making good use of existing local knowledge of the area;
- **Avoiding** any misconceptions about the project and properly manage expectations;

Thereafter the results will provide proper documentation of stakeholder feedback and enhance the ESIA accordingly.

## 2 Regulations and Requirements

### 2.1 National Regulatory Context

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Environmental guidelines developed by Environmental Quality Authority, drafted in section 6.1.11 clearly designate the importance and cruciality of consultation activities with various stakeholders to the project. Consultation activities can be done either through an environmental consultant or by EQA themselves. Moreover, it is important to engage various stakeholders in the project during planning and implementation phases. This is particularly true for Category C projects, as two R&M workshops are included. The national legislations define:

- Scope of public consultation
- Consultation plan
- Consultation methods
- Documentation of consultation and points of discussion

## 2.2 International Regulatory Context

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### 2.2.1 World Bank requirements for stakeholder engagement and public consultation

The policies pertaining to stakeholder engagement activities according to the World Bank are:

- Directive and Procedure on Access to Information
- World Bank Operational Policy (OP 4.01)

### 2.2.2 IFI requirements for stakeholder engagement and public consultation

PWA has committed to developing the Project in line with international good practice standards and in particular the IFC PS 2012. The specific standard of reference is:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS1 requires a systematic approach to stakeholder engagement, which considers the views, interests and concerns of stakeholders, particularly those within the AOI. Such an approach is designed to help build and maintain a constructive relationship with Project stakeholders. PS1 also requires the development of a Grievance Mechanism (GM) for the Project, which needs to be disclosed to affected communities and project workers, as appropriate, to ensure a good understanding of the process.
- PS1 also states that in addition to meeting the requirements of the Performance Standards, ‘clients must comply with applicable national law, including those laws implementing host country obligations under international law’.<sup>1</sup>

## 3 Summary of Key consultation activities conducted to date (May 2018)

### 3.1 Consultation Methodology and Activities

The research team for this study has adopted multi-dimensional consultation activities that enable the marginalized, voiceless, youth and women to gain information about the project. As well, gaining information about their concerns and worries regarding the project during various

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<sup>1</sup> IFC PS (2012): Overview (Para 5, page ii).



implementation phases. Due to time constraints a team was mobilized to consult with community people and stakeholders in parallel.

Following are the main consultation activities to date that will be supplemented by additional engagement activities:

- The study team visited the project area in order to define various stakeholders during April 2018
- Meetings were conducted during April 2018 in order to develop an engagement plan that is locally tailored for the residential communities along with the study team members
- Based on the identification of stakeholders, various questionnaires and guidelines were prepared in order to engage: i) the residents in the project areas, ii) Governmental municipalities, iii) the CBOs, iv) health facility, v) Ministry of Endowment and Ministry of Agriculture, vi) the EQA
- The study team divided various engagement activities of the project to:
  - a. Screening
  - b. Scoping phase and data collection phase and,
  - c. Public consultation phase.
  - d. Final report disclosure

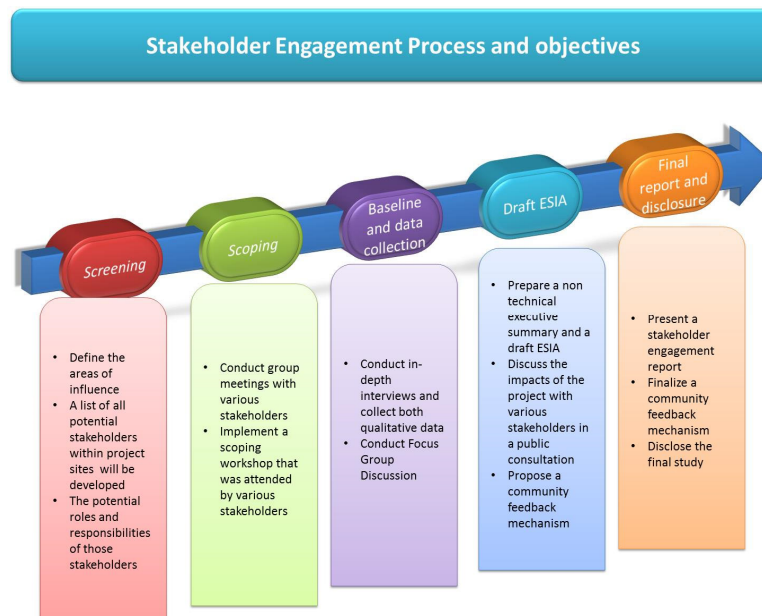


Figure 3-1: Stakeholder engagement process and objectives

- All activities conducted were documented with photos and lists of participants in order to warrantee appropriate level of transparency.

### **3.2 Strengths and Limitation of consultation**

#### **3.2.1 Strengths of the consultation**

- 1- Local mobilizers were recruited from Gaza Strip in order to facilitate conducting consultation meetings and collecting primary data
- 2- The local mobilizers suggested the main stakeholders, role players or those who take interest in the project based on a list of potential stakeholders provided by the consultant
- 3- They managed to facilitate various meetings conducted with the governmental and non-governmental entities in their premises
- 4- Prior to each consultation event, the local mobilizers attempt to communicate with and invite the community people. This is carried out through the distribution of flyers, posters and meetings with the local authorities
- 5- The role of the CBO recruited was to facilitate any legally required permits in order to meet with any of stakeholders

#### **3.2.2 Limitation of the consultation**

- 1- Consultation activities did not manage to meet with All PAPs who are expected to lose their properties, e.g. wells, lands...etc
- 2- Concerns raised about the cost of water and the detailed of project implementation were not responded to due to the absence of information

### **3.3 Summary of Key consultation activities conducted to date (May 2018)**

The key consultation activities during the course of the project are summarized in Table 3-1 below.

Table 3-1: Summary of consultation activities conducted to date

No	Stakeholder	Date	Meeting objectives	Meeting outcome
1.	PWA	8 <sup>th</sup> of April 2018	<ul style="list-style-type: none"> <li>A preliminary meeting to introduce the study objective and update the data required in the inception phase</li> </ul>	<ul style="list-style-type: none"> <li>PWA shared information about issues related to:                             <ol style="list-style-type: none"> <li>Updating project information</li> <li>Challenges</li> <li>Land required</li> <li>Mitigation of unfavorable impacts</li> </ol> </li> </ul>
2.	the Ministry of Endowment representative	10 <sup>th</sup> of April 2018	<ul style="list-style-type: none"> <li>To inform the participants about the project</li> <li>To define any land needed by the project</li> </ul>	<ul style="list-style-type: none"> <li>There</li> </ul>
3.	Jabalia municipality	10 <sup>th</sup> of April 2018	<ul style="list-style-type: none"> <li>Sharing information about the project rehabilitation activities</li> <li>Collect information about their perception of the project</li> <li>Awareness strategies and community participation</li> <li>Capacity building of the municipality to monitor project activities</li> </ul>	<ul style="list-style-type: none"> <li>The project positive impacts pertaining to environmental aspects</li> <li>Potential measures required to put limitation of the adverse impacts</li> </ul>
4.	Beit Hanoun municipality	11 <sup>th</sup> of April 2018	<ul style="list-style-type: none"> <li>Sharing information about the project rehabilitation activities</li> <li>Collect information about their perception of the project</li> <li>Awareness strategies and community participation</li> <li>Capacity building of the municipality to monitor project activities</li> </ul>	<ul style="list-style-type: none"> <li>The project positive impacts pertaining to environmental aspects</li> <li>Potential measures required to put limitation of the adverse impacts</li> </ul>

5.	Gaza municipality	11 <sup>th</sup> of April 2018	<ul style="list-style-type: none"> <li>Sharing information about the project rehabilitation activities</li> <li>Collect information about their perception of the project</li> </ul>	<ul style="list-style-type: none"> <li>The project positive impacts pertaining to environmental aspects</li> <li>Potential measures required to put limitation of the adverse impacts</li> </ul>
6.	Ministry of Agriculture	11 <sup>th</sup> of April 2018	<ul style="list-style-type: none"> <li>Land acquisition related to the project</li> <li>The price of generated water</li> <li>Farmers' perception of the reused water</li> <li>Awareness raising requirement</li> </ul>	<ul style="list-style-type: none"> <li>Limited reluctance from the farmers was reported</li> <li>Awareness raising activities are essential</li> <li>The exact water tariff to be shared with the farmers</li> </ul>
7.	Palestinian Land Authority	15 <sup>th</sup> of April 2018	<ul style="list-style-type: none"> <li>Land acquisition related to the project procedures and responsibility</li> <li>Price of lands</li> <li>Responsibility for compensating wells operators and crops</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition procedures to be adopted by the PLA</li> </ul>
8.	Ministry of Local Government	16 <sup>th</sup> of April 2018	<ul style="list-style-type: none"> <li>Defining the role of MLG</li> <li>Identify the proposed compensation and responsibility of compensation</li> </ul>	<ul style="list-style-type: none"> <li>MLG role is limited to expropriation of lands</li> <li>They review the urban development plans and assure no transections with the project</li> </ul>
9.	PWA, the consultant with the PAPs  This meeting with sublemented with site visits and additional meetings	22 <sup>nd</sup> of April 2018	<ul style="list-style-type: none"> <li>Provide information about the project</li> <li>Respond to farmers and PAPs concern</li> </ul>	<ul style="list-style-type: none"> <li>PWA provided the available information to date</li> <li>PWA and the consultant documented various concerns raised:               <ol style="list-style-type: none"> <li>Land required to construct the wells</li> <li>Remedial actions</li> <li>The need not to terminate the private well until the project is</li> </ol> </li> </ul>

				fully and properly functioning d. Reduce water cost
10.	Palestinian non-governmental organizations network	24 <sup>th</sup> of April 2018	<ul style="list-style-type: none"> <li>• Provide information about the project</li> <li>• Define further engagement with the community</li> <li>• Define the required data to be shared with farmers</li> <li>• Propose awareness raising role in full cooperation with the NGOs</li> </ul>	<ul style="list-style-type: none"> <li>• The required data needed was mainly:                             <ul style="list-style-type: none"> <li>a. Information about pricing system</li> <li>b. Required lands</li> <li>c. Compensation for lands</li> </ul> </li> </ul>



Figure 3-2: Meeting with El Awqaf



Figure 3-3: Meeting with Jabalia municipality



Figure 3-4: Meeting with Beit Hanoun municipality



Figure 3-5: Meeting with Gaza municipality





Figure 3-6: Ministry of Agriculture



Figure 3-7: Palestinian Land Authority



Figure 3-8: Meeting with the PAPs on the 22nd of April



Figure 3-9: Meeting with one of the PAPs

The above mentioned activities supplemented the activities conducted in 2012. Additionally, a scoping session was prepared and implemented.

### 3.4 The Scoping consultation event

The scoping meeting was held on the 23rd of April 2018 and was attended by a wide range of stakeholders including various municipalities, academics, NGOs, Palestinian Water Authority, Ministries and consultation firms.

The workshop, organized as per TOR requirements took place from 9.30 to 12.40 and was attended by 32 participants, 5 of them being females and 4 being speakers. Please refer to [Annex I](#) for the (list of participants). The first session was opened by a briefing of the project components, followed by the environmental and social presentations, and the second session was reserved for an open discussion. The workshop Agenda is enclosed in [Annex I](#)

The speakers were the following:

- E.Rebhi Al-Sheikh, Vice chairman of PWA
- E.Yaser Qishawi, PMU-PWA
- Dr.Tareq Genena, EcoConServ

- Dr.Zeinab Hafez, EcoConServ



Figure 3-10: The panel



Figure 3-11: Beit Lahia municipality representative



Figure 3-12: Ministry of health



Figure 3-13: Participants

Following is a summary of the main issues raised during the scoping session

## 3.4.1 Summary of discussion

Issue raised	Comment raised	Response	How it was responded to in the study
<b>Health concerns</b>	<p>Some previous ground water tests show a high level of health related pollutants (ammonia as example), this should be considered.</p> <p>What are the tools that will be used to predict the project impact on ground water, and how to quantify this impact? The pilot project of Gaza municipality of waste water reuse in Sheikh Ajleen area, this can be revised as a case study.</p>	<p>PWA have an integrated sampling program for the plant, the infiltration ponds and groundwater reservoir. Which has been recently updated. The private wells will not be closed, we hope the project will provide the farmers a competitive service to use the recovered water. Certainly, the monitoring plan shall be developed. It may be extended to the crops irrigated by the recovered water.</p> <p>The Land Authority allocated the land of 14 wells from private lands. The compensation issue will be covered by this study.</p>	To be added in the mitigation section
<b>Institutional set-up</b>	The project should focus on the importance of the institutional framework as it is the basis for the operation and success of this project. He explained that the Palestinian legislation classifies this water as groundwater because it mixes with groundwater after its infiltration.	<p>One of the outputs of the study is the environmental management plan, which assign who will do what. I suggest to form an institutional body from all the stakeholders to manage, organize, monitor, and operate the project components.</p> <p>This study should result a realistic and applicable procedures</p>	To be added in the institutional section

Issue raised	Comment raised	Response	How it was responded to in the study
<b>Monitoring requirements</b>	There is a lack of monitoring in all project stages. It's recommended to engage the relevant authorities in this progress. He mentioned the Ministry of Health, Agriculture, Environment, and the municipalities.	PWA will develop a detailed monitoring scheme for all project activities including E&S performance	To be added in the monitoring sections
<b>Land acquisition and role of municipality</b>	Municipalities should be involved in the process of land acquisition and compensation to contribute in resolving disputes, if any. The Ministry of Agriculture and other Agricultural Institutions should be involved in the development of the project operation plan. He focus on Developing a clear vision of water pricing and whether there is a cost recovery.	In full compliance with the Palestinian land acquisition regulations, the municipalities will be engaged and consulted in the process of compensation	To be added in the mitigation sections and in the RAP study
<b>Required updated data</b>	There are many updates regarding 2013 data, such as statistics, economic conditions in Gaza, water quality and suitability for agricultural use, farmers' crop pattern. He focused on the use of the nitrate existing in the waste water as soil fertilizer. Which also reduce its treatment cost.	The study team reviewed the current data disclosed on PCBS and obtained updated data from the PWA including the new layout	Updated data will be presented in the project description and baseline

Issue raised	Comment raised	Response	How it was responded to in the study
<b>Water tariff</b>	<p>How can the social impact be measured without a clear water tariff?</p> <p>Emphasized on the importance of water pricing considering the operational capacity of the project. Modern agriculture should be supported through good pricing and product marketing. Solar energy is a very good proposition because it lowers water prices on farmers. Government support should be provided for this project. All possible emergency cases shall be considered and the study.</p>	The tariff is still being discussed	To be added in stakeholder engagement requirements and concerns
<b>Need to recover all water</b>	The need to recover all the infiltrated water to minimize the negative impact on the groundwater quality.	PWA will exert effort to reuse all water, particularly due to the rigid need for water supply	To be added in stakeholder engagement requirements and concerns
<b>Participation of community in the scoping session</b>	The absence of community institutions from all project activities! We recommend to engage the farmers in the consultative process of the project.	During scoping phase, we managed to meet with various community members in their premises. However, the scoping session is allocated for experts who might provide guidance to enrich the ESIA. This is in full compliance with EQA and IFC standards	Community people should be invited in the final consultation section
<b>Termination of private wells</b>	The Private wells within the area of the recovery wells, Will it be closed or merged with system	Few number of private wells will be terminated	To be added in the RAP



Issue raised	Comment raised	Response	How it was responded to in the study
<b>Pollutants</b>	Is there any examination of the microbes (ex: hepatocellular virus) pollute the groundwater through infiltration?	PWA developed and will continue measuring various pollutants	To be added to mitigation plan
<b>Management of private wells</b>	How to manage the private wells exist within the project area?	PWA will cooperate with the farmers	To be added in the Stakeholder Engagement Plan
<b>Probability of Israeli incursion</b>	Concern of Israeli incursions into the destruction of irrigation networks.	All projects in Gaza have the same concern	To be added as a risk to the project
<b>Well operators mitigation measures</b>	How well operators will be mitigated?	Well operators have been interviewed and mitigation measures will be proposed in the RAP study	To be added in the RAP and mitigation measures
<b>Points to be added to the study</b>	There are clay layers in the saturated zone that have not been studied in 2013 and may affect the infiltration process.	To be studied by the environmental expert	
<b>Water usage in case of not used by farmers</b>	Where will this water discharge if it is not used by farmers? I suggest a conveyor line to Wadi Gaza.	There is an emergency plan that proposes the measured to be taken in such case. However, given the shortage of water supply in Gaza Strip, water will be used	To be added in the emergency plan
<b>Time plan</b>	When the remaining components of the project are expected to be completed?	There is no time plan as the fund has not been secured to date	No action
<b>Marketing for produced water</b>	The importance of this water being marketed in a way that attracts the farmer to use it. He emphasized Developing a vision for the project regulatory body	This proposal will be discussed and handled by the PWA	To be added in the SEP

By the end of this session the PWA and ESIA consultant (UG/ ECOCO

## 4 Project Stakeholders

The objectives of stakeholder identification include: a) establishing which organisations and individuals may be directly or indirectly affected (positively and negatively), or have an interest in the Project; and b) understanding their needs and expectations for engagement.

Stakeholder analysis enables engagement to be tailored appropriately to the needs and interests of different stakeholder groups to ensure their views and concerns are addressed in a suitable manner.

A systematic approach has been adopted to identify Project stakeholder which has included:

- Defining the Project's AOI which basically covers Jabalia, Um El Nasr, Beit Hanoun and Beit Lahia;
- Scoping and identifying stakeholder group that could be affected (directly or indirectly) by the Project, or have an interest in it;
- Identifying vulnerable groups; and
- Review AOI, stakeholders and vulnerable groups during each SEP update and, if necessary, revise based on current Project context.

In order to ensure that the engagement process is inclusive, individuals and groups who may find it more difficult to participate and those who may be 'directly and differentially or disproportionately affected by the Project, or disadvantaged in sharing development benefits and opportunities, because of their vulnerable status' were identified.<sup>2</sup> It will be important for the Project to ensure specific steps are taken to access those groups and provide them with an opportunity to engage in discussion about the Project and their interactions with it.

**Table 4-1: Vulnerable Groups**

Vulnerable Group	Description and Relationship to the Project
<b>Women and Female-headed households, and low-income women</b>	Women and female-headed households, widows and divorcees seem to have unequal access to income generation. Since quite often, these women have not received as much education as their male counterparts and because it is not customary for women to work outside the home, most have limited access to income generation and less employment chances by the Project. Additionally, they are likely to have reduced opportunities for participation in public engagement (or other public activities) and potentially less access to information.

<sup>2</sup> IFC PS 1: Assessment and Management of Environmental and Social Risks and Impacts; para. 12

<b>People with disabilities or chronic diseases</b>	People with disabilities or chronic diseases often have a lower ability to gain employment and generate income. The physically disabled are likely to be particularly vulnerable members of the community as they tend to need more support and often rely on family care.
<b>Elderly (men and women)</b>	Elderly (men and women) are likely to have a more limited ability to work; there may be challenges for them to gain employment with the Project.

Table 4-2 summarizes various stakeholders who have interest/influence of the project or might be affected by project activities.

**Table 4-2: Description of Project Stakeholders**

Stakeholder Category	Stakeholder Group	Potential Implications for Stakeholder Groups
<b>Communities in the Area of Influence (AOI)</b>	Residents of rural communities within the AoI including, but not limited to: <ul style="list-style-type: none"> <li>• Jabalia residents</li> <li>• Beit Lahia residents</li> <li>• Um El Nasr</li> <li>• Beit Hanoun</li> </ul>	Residents of these communities are more likely to be adversely affected by environmental and social impacts; for example noise and traffic during construction and other impacts relating to health, safety and security. Residents of local communities will also potentially benefit from job opportunities or other positive economic outcomes. They will have interest and will be impacted by project activities
	Vulnerable groups within the local communities	Vulnerable groups may be likely to be adversely affected by environmental and social impacts, while also being least likely to benefit from the Project. They will have interest and will be impacted by project activities
	Village family heads and influential, trusted leaders	As residents of the local communities, family heads are likely to be impacted by any social and environmental risks and impacts (positive and negative). Family heads are leaders in the community, representing the local families and often taking a key role in dispute resolution. They will have interest and will be impacted by project activities
	Small business owners	Local businesses have the potential to benefit economically from the Project. However, as local residents this group also have the potential to be impacted by any social and environmental risks and impacts (positive and/or negative). They will have interest and will be positively impacted by project activities

<b>Businesses /Industry</b>	All businesses/industries	Other industries/businesses (e.g., food stalls) will have the potential to benefit economically (directly or indirectly) from the Project, particularly during construction. They will have interest and will be positively impacted by project activities
<b>Project Workforce (both direct and through subcontractors)</b>	Project workers	The workforce is integral to the Project and a sound worker-management relationship is key for the sustainability of a company. Failure to establish and foster a sound worker-management relationship can undermine worker commitment and retention, and can jeopardize a project. They will have interest and will be positively impacted by project activities
<b>Property owners of workforce accommodation</b>	Property owners	The Project workforce is being accommodated in distinct properties, many of which are located in New Beni Suef. The Project will establish and maintain a database of property owners and, as needed, can engage with these stakeholders to understand any potential impacts posed by the Project workforce. They will have interest and will be positively impacted by project activities
<b>Health care providers</b>	Local health care providers	The Project will need to establish procedures to minimize the risk of exacerbation of community exposure to health issues, as a result of worker influx. They will have interest and will be positively impacted by project activities and they might be concerned about the project
<b>NGOs and civil society</b>	Community Development Associations in Jabalia, Beit Lahia and Om El Nasr	The Community Development Association in Jabalia, Beit Lahia and Um El Nasr is active in the AOI and a good partner and source of local knowledge. They will have interest and will be positively impacted by project activities
<b>National government stakeholders</b>	Environmental Quality Agency (EQA)	The EQA has overall responsibility for permitting and the EA process. They have interest in the project
	Palestinian Water Authority	They are the project owner
	Coastal Municipality Water Utility (CMWU)	They are responsible for providing the Gaza Strip' residents with integrated, distinct, and environmentally safe water and sanitation services through the optimal utilization of available resources and creative solutions. They will cooperate with the PWA in managing and operating the project

<b>Local/provincial government stakeholders</b>	Ministry of Agriculture / Agricultural Directorate	This Ministry is involved in crop valuation and irrigation scheme cost They have interest in the project
	Traffic department	Responsible for permitting related to any road work for the Project (e.g., road cutting). They have interest in the project
	Municipalities in Gaza, Jabalia, Beit Lahia	They will be responsible for provision of lands and other facilities to the project. They will participate in the operation phase They will have interest and will be positively impacted by project activities
	Palestinian non-governmental NGOs' network	They will be responsible for raising farmers awareness about irrigation water They will have interest and will be positively impacted by project activities
	Water Users Association	They will be the direct beneficiary of the project and will participate actively in project implementation procedures

EcoConServ took note of and assured all the stakeholders that the team will be working in addressing all raised issues in a comprehensive manner .



## 5 Stakeholder Engagement Program

The section of the SEP provides details of the engagement to be undertaken during planning, construction and operation of the Project

### 5.1 Communication Methods

Community members indicated that they are comfortable receiving information about the project via local leaders (family heads), teachers, religious leaders, representatives of civil society organisations, as well as elected members of parliament. They also suggested that a “SDO” should be put in place by the Project. Since this suggestion was received, the Project has hired and put in place the Social team<sup>3</sup> to liaise with the community on a regular basis.

Stakeholder engagement activities are being / planned to be conducted through the following engagement methods:

- Public hearing
- letters and phone calls;
- notice boards;
- distribution of Project Information Documents (PIDs);
- key informant interviews (KIIs);
- focus group discussions (FGDs) with key stakeholders (including vulnerable);
- Comment forms as part of the grievance mechanism

### 5.2 Proposed stakeholder engagement and disclosure activities

Following is a preliminary stakeholder engagement program that will be fine-tuned on quarterly basis during the construction and operation phases:

**Table 5-1: Stakeholders Engagement & Disclosure Activities**

Issue	Information & Documents for Disclosure	Disclosure timeframe	Responsibility	Target groups	Communication Channel
Preparation Phase					
Environmental and Social Impact Assessment results	<ul style="list-style-type: none"> <li>Non technical summary</li> <li>ESIA final report, RAP and Stakeholder Engagement Plan</li> </ul>	Upon completion of the ESIA	PWA	<ul style="list-style-type: none"> <li>All stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>Hard copies to be shared with various stakeholders,</li> <li>Upload studies and reports on PWA website</li> </ul>
Land required and termination of private wells	<ul style="list-style-type: none"> <li>Brief summary about the lands required and potential impacts</li> <li>Lists of project affected persons (well owners- land owners –well operators)</li> <li></li> </ul>	Three months prior to any land acquisition	PWA	<ul style="list-style-type: none"> <li>PAPs</li> <li>Municipalities</li> <li>Ministry of Agriculture</li> <li>Palestina Land Authority</li> <li>Awqaf</li> <li>Ministry of Local Government</li> </ul>	<ul style="list-style-type: none"> <li>Face to face meetings</li> <li>Group meetings</li> <li>Posters to be disclosed on the billboard</li> </ul>

Issue	Information & Documents for Disclosure	Disclosure timeframe	Responsibility	Target groups	Communication Channel
Timeframe	<ul style="list-style-type: none"> <li>Time line of project activities</li> </ul>	One month prior to construction activities	PWA and the contractor	<ul style="list-style-type: none"> <li>Municipalities and local community people</li> </ul>	<ul style="list-style-type: none"> <li>Provide a time plan to the municipalities</li> </ul>
Job opportunities	<ul style="list-style-type: none"> <li>List of available opportunities including duration and application details</li> <li>Monitoring reports;</li> <li>Health and safety instructions;</li> <li>Labour rights</li> </ul>	1 month prior to beginning of construction	Social Development Officer in PWA and the contractors	<ul style="list-style-type: none"> <li>Young people</li> <li>Workers unions</li> </ul>	<ul style="list-style-type: none"> <li>List of available opportunities at SDO office</li> <li>Posters in the municipalities and PWA premises</li> <li>Advertisement</li> </ul>

Issue	Information & Documents for Disclosure	Disclosure timeframe	Responsibility	Target groups	Communication Channel
Construction of infrastructure	<ul style="list-style-type: none"> <li>Construction program and timing</li> <li>Project progress report upon finalization of construction activities, including environmental and social impacts, health and safety performance, and implementation of the external GRM</li> </ul>	Two weeks prior to construction)	SDO On-site engineer Relevant municipalities	<ul style="list-style-type: none"> <li>Area of influence municipalities</li> <li>Other interested bodies i.e. Ministry of Agriculture</li> </ul>	<p>Sharing brief updates on unified project's social media</p> <p>Face-to-face meetings, which could involve the whole community or smaller focus groups.</p> <p>Written updates posted at frequented locations like the local school and mosques;</p>
Training and Capacity Building activities	<p>Sharing capacity building opportunities and necessary requirements with community</p> <p>Monthly update</p>	Once per month	SDO and training centers	<ul style="list-style-type: none"> <li>Area of influence municipalities</li> <li>Other interested bodies i.e. Ministry of Agriculture</li> </ul>	<p>List of available capacity building opportunities at SDO office</p> <p>Posters in the municipalities</p> <p>Summary to be shared with target groups (hard copies)</p>

Issue	Information & Documents for Disclosure	Disclosure timeframe	Responsibility	Target groups	Communication Channel
Health and safety	Safety instructions and warning signs should be placed in a clear and understandable (visual preferred) manner on all relevant locations on site	Prior to construction activities. Ongoing.	On site engineer SDO	<ul style="list-style-type: none"> <li>Area of influence municipalities</li> <li>Other interested bodies i.e. Ministry of Agriculture</li> <li>Project workers</li> </ul>	Safety signs, instructions and emergency plan
Construction Phase					
Job opportunities	<ul style="list-style-type: none"> <li>List of available opportunities including duration and application details</li> </ul>	3 weeks-1 month prior to beginning of operation	Social Development Officer in PWA and the contractors	<ul style="list-style-type: none"> <li>Young people</li> <li>Workers unions</li> </ul>	<ul style="list-style-type: none"> <li>List of available opportunities at SDO office</li> <li>Posters in the municipalities and PWA premises</li> <li>Advertisement</li> </ul>



Issue	Information & Documents for Disclosure	Disclosure timeframe	Responsibility	Target groups	Communication Channel
Traffic	<ul style="list-style-type: none"> <li>○ Schedule of transportation including expected traffic peaks &amp; routes and numbers for grievances</li> <li>○ Traffic Management Plan</li> </ul>	1 week – 10 days prior to mobilization	Social Development Officer in PWA and the contractors	<ul style="list-style-type: none"> <li>○ Municipalities</li> <li>○ Traffic department and Ministry of Transportation</li> </ul>	<p>Schedule on site and at SDO office</p> <p>Schedule at municipalities</p>

Issue	Information & Documents for Disclosure	Disclosure timeframe	Responsibility	Target groups	Communication Channel
Site construction activities	<ul style="list-style-type: none"> <li>Construction program and timing</li> <li>Annual project progress reports, including environmental and social impacts, health and safety performance, and implementation of the external GRM</li> <li>Induction training to all workers.</li> <li>Prior to work a daily briefing to be given to the workers</li> <li>Regular bulletin disclosed on site; tool box talks; induction information for new workers</li> </ul>	<p>Two weeks prior to beginning of construction</p> <p>From beginning of project activities</p>	<p>SDO</p> <p>On-site engineer</p> <p>Relevant Developer</p>	<ul style="list-style-type: none"> <li>Area of influence municipalities</li> <li>Other interested bodies i.e. Ministry of Agriculture, Ministry of Local Government, and Farmers NGOs</li> </ul>	<p>Sharing brief updates on unified project's social media</p> <p>Face-to-face meetings, which could involve the whole community or smaller focus groups.</p> <p>Written updates posted at frequented locations like the local school and mosques;</p>

Issue	Information & Documents for Disclosure	Disclosure timeframe	Responsibility	Target groups	Communication Channel
Health and safety	<ul style="list-style-type: none"> <li>Safety instructions and warning signs should be placed in a clear and understandable (visual preferred) manner on all relevant locations on site</li> </ul>	Prior to beginning of construction activities on site. Ongoing.	On site engineer SDO	Workers	Safety signs, instructions and emergency plan
Operation Phase					
Operation activities	Update on operational performance, and ongoing communication on key issues, Annual reports Monitoring Plans; Progress of ESMP	Once per month	SDO, on-site engineer, Health and Safety specialist, relevant developer	<ul style="list-style-type: none"> <li>Area of influence municipalities</li> <li>Other interested bodies i.e. Ministry of Agriculture, Ministry of Local Government, and Farmers NGOs</li> </ul>	Monthly meeting with community leaders and municipalities

Issue	Information & Documents for Disclosure	Disclosure timeframe	Responsibility	Target groups	Communication Channel
Emergency Plan	Sharing unified emergency procedures/plan including evacuation routes, rally points, emergency signals Contact information for emergency response facilities such as firefighting or first aid equipment	Prior to operation Weekly reminders and monthly drills	SDO, on-site engineer, Health and Safety specialist, relevant developer	<ul style="list-style-type: none"> <li>Area of influence municipalities</li> <li>Other interested bodies i.e. Ministry of Agriculture, Ministry of Local Government, and Farmers NGOs</li> </ul>	Emergency plan document shared with all site managers/engineers, health and safety officer

### 5.3 Roles and Responsibilities for Implementation and Supervision

The mitigation measures and monitoring activities recommended in Chapter 5 of the ESIA update report shall be implemented according to the above-mentioned institutional set-up. Table 5-1 lists the responsibilities of different stakeholders for mitigation measures and monitoring activities during construction/operation, remediation works and decommissioning phases.

The reporting of ESMP measures should be done on a monthly basis by the EC during the correspondent phase of the project. The monthly reports will be presented to the PMU-EM or CMWU-EM (or WWDU – EM) who shall make sure that the ESMP measures are implemented in due course according to the progress report. The PMU-EM should report for the PMU Manager on an annual basis. In case a corrective action is needed the PMU-EM should ask the PMU Manager for the resources to take corrective action and should adequately report the corrective action taken. These reports should include the following components:

- Monthly reports prepared by EC and submitted to PMU-EM:
- Annual report prepared by the PMU-EM and submitted to the PMU Manager or CMWU Manager depending on their project components.

The specific roles and responsibilities of the SDO planned to be appointed under the PMU are presented in Box 5.1 below.

The SDO should have a degree in social science or social development practice, be familiar with work in projects with similar scope and have exceptional communication and facilitation skills. Local university graduates, particularly women, should be encouraged to apply. To enable the SDO to efficiently fulfill his/her responsibilities, the capacity building and training modules presented in Box 5-2 are proposed. The SDO should receive these capacity building programs before start of the construction phase of the project.

Regarding the public health issues related to different orientation sessions and awareness raising activities, the social officer should prepare, implement and document the awareness raising activities provided to community people and project stakeholders. The main topics that will be covered by the SDO are:

- 1- Water problems in Gaza Strip and mechanisms to solve them
- 2- Sludge and recovered water benefits
- 3- Health preventive methods to be applied during usage of sludge/recovered water

4- How to combat insects in an environmentally safe way

Some of the proposed awareness sessions will require the SDO both in coordination with the Ministry of Health and Ministry of Agriculture

**Box 5-1: Key responsibilities of the Social Development Officer (SDO)**

- Establish dialogue with project affected groups, including local communities in the project sites, landowners and farmers and ensure the project is implemented in socially sensitive manners that consider the interests of these groups.
- Monitor the project performance and report challenges and propose measures to improve project performance.
- Design and implement awareness raising campaigns in cooperation with CBOs
- Facilitate the formation of various community based mechanisms including community-based monitoring committee and social committee as part of implantation of the Involuntary Resettlement Plan.
- Close facilitation for the execution of the Resettlement Action Plan and ensuring that compensations are reaching the PAPs.
- Maintain databases and efficient records for the PAPs as part of the ARAP
- Maintain database and efficient records of the farmers for distribution of recovery water and sludge reuse and work to integrate them in the various programmes and interventions to minimize the potential negative impact on them.
- Assist in developing strategies for the implementing the long term measures (e.g. raising the profile of wastewater reuse and sludge management and reuse, develop and enforce financial sustainability instruments)
- Ensure adapting participatory mechanisms in monitoring the project impacts and evaluating outcomes
- Prepare quarterly progress reports and raise it to the PMU and report to the World Bank where applicable.
- Coordinate with other successful models (e.g. the model of .... Project for wastewater reuse and sludge management and recycling) to benefit from the experience and lesson learnt



**Box 5-2: Proposed Capacity Building Programs for the SDO**

- OP 4.12 and Palestinian laws related to land ownership
- Communication Skills
- Community Participation Tools
- Consensus Building Techniques
- Participatory Monitoring and Evaluation (PM&E)
- Promotion of Awareness Raising Activities

## **6 Proposed Grievance and Redress Mechanism**

Grievances are a problematic issue for the majority of developmental projects. Thus, this section should be handled carefully in order to settle any potential disputes that might rise with the hosting communities. This section will cover the following issues:

1. Responsible entity for implementing the grievances' mechanism
2. Grievances tiers that encourage inclusion of marginalized group ( women, poor, illiterate and handicapped groups)
3. Grievances channels that are locally tailored
4. Response to grievances procedures
5. The role of locally based organizations
6. Dissemination of the results of the submitted grievances to the community
7. Monitoring of grievances activities

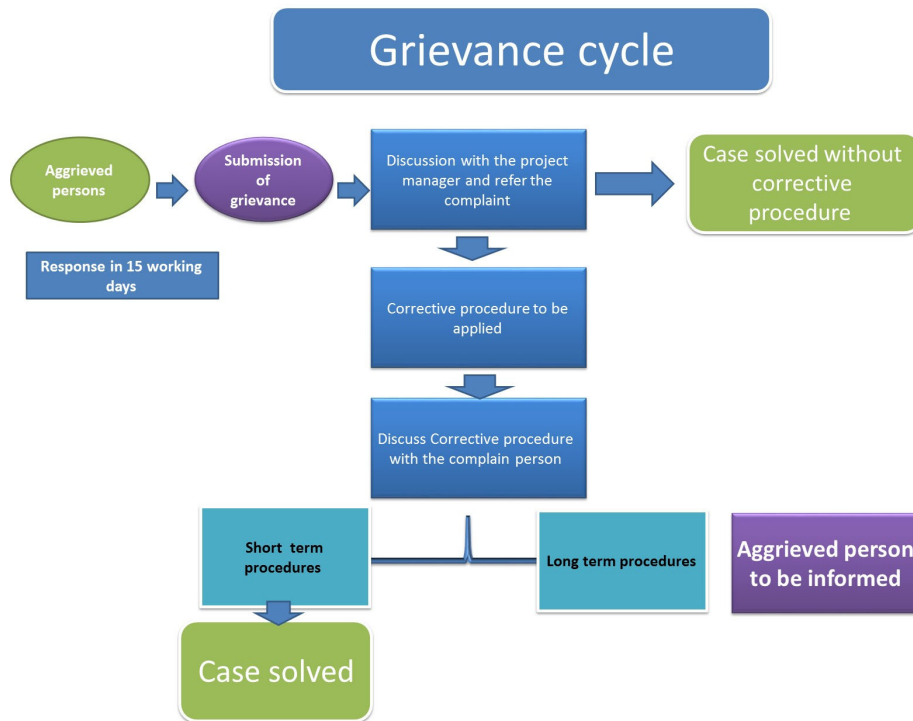


Figure 6-1: Grievance and Redress Mechanism Cycle

Generally speaking, all grievances received verbally or in written shall be documented in a grievance register, handled by the PMU in PWA. It is of importance to react as quickly as possible to the grievance of the citizens.

A best practice standard is to acknowledge all complaints within 10 days. The different nature of the complaints require different times to be resolved, some requiring medium or long-term corrective actions. For all cases, however, it is recommended that a formal procedure is followed within 30 days:

1. The petitioner has to be informed of the proposed corrective measure.
2. In case if a corrective action is not required, the petitioner has also to be informed accordingly.
3. Implementation of the corrective measure and its follow up has to be communicated to the complainant and recorded in the grievance register

In order to enable the PWA to implement the grievances mechanism appropriately, a Social Development Officer should be hired and integrated in the PMU

## 6.1 Institutional Responsibility for the Grievances

The main entity responsible for handling the grievances will be the PMU within the implementing agency (PWA). The Social Development Officer (SDO) working within the PWA in cooperation with the municipalities will address all grievances raised by community people, particularly the ones related to resettlement activities. The main tasks of the SDO are:

1. To raise people awareness about the exact grievances mechanisms
2. To collect the grievances received through different communication channel
3. To document grievances received
4. To direct the grievance to the responsible entities to solve the problem
5. To follow up how the problem was addressed and solved
6. To document, report and disseminate the grievances results
7. Monitoring of grievances activities
  - Raising community awareness about the grievance mechanism should be handled as follows: brochures should be developed and sent to the main stakeholders, PAPs, CBOs, municipalities, mosques and churches.
  - Documentation of the activities should be handled carefully and thoroughly. A monthly report should be prepared about received grievances, how they were solved and the level of satisfaction of the affected person towards the solution. This report should be published on the website.

## 6.2 Grievances tiers

The World Bank's OP 4.12 advances a "first tier grievance management mechanism", which will be a function of the Project, to provide aggrieved people with an avenue for amicable settlement without necessarily pursuing a court case.

The absence of a first tier grievance mechanism in Palestinian law means there are difficulties addressing minor issues that otherwise should be resolved within a short period of time. The absence of such mechanism denies project affected groups the direct channel for grievance and delays resolution of disputes in an appropriate time prior to resettlement. In order to avoid delay in dispute resolution, it is essential for the government to consider adopting the first tier grievance redress mechanism advanced by the Bank OP 4.12. If need arises, aggrieved people would however remain free to open a Court case without having registered their grievance with this first-tier mechanism.

A grievance is an important process that should be tackled carefully. The PWA receives grievances from the petitioners, and any other channels. Based on the site visits, the Project affected persons

don't know the appropriate channels through which they can submit their grievances. Thus the following procedures will be applied in order to have a clear grievance's mechanisms:

**First tier of grievances:**

1. The PWA will assign a Social Development Officer (might be more than one) who will be responsible of receiving all grievances from all different stakeholders.
2. The SDO will inform the community about grievances mechanism, whom to address to solve the complaints, solution for the problems and document all grievances received. Moreover, he will follow up the problem until it is solved. The turnaround time for the response /resolution should be 15 days.

**Second tier of grievances:**

In case of an unsolved complain, the affected person might follow the second level of grievances:

1. A Grievance Mediation Committee should be formed among the municipalities and other entities. It will be responsible for the discussion of the unsolved complains, propose solutions, as well as, take decision and play a mediation role with the affected persons.
2. A regular meeting should be assigned by the Compensation Committee. The complainants can attend these meetings

### **6.3 Grievances channels**

Due to the diversity of the socioeconomic characteristics of the PAPs, the communication channels to receive grievances were locally tailored to address all affected groups. The following are the main channels through which grievances will be received:

1. Hotline (a mobile number for the SDO to be informed to project affected areas).
2. The second channel is through religious institutes in the area (mosque or church)
3. CBOs will be appropriate channel among rural areas
4. Regular meetings with community people to be conducted and applied by the influence stakeholders
5. Website for educated people who have access to the internet
6. Influence people and Mediation Committee

## 6.4 Response to grievances

Response to grievance will be through the following channels

1. The response of the grievance will be through the same channel used to submit the problem. For example, those who sent their grievances in writing should receive their response in written form, those who used the website should receive an email, those who phoned should receive a telephone call from the SDO telling the solution of their problems
2. The second channel is through religious institutes in the area (mosque or church)
3. Response to grievances should be handled in appropriate timing limits to give the community people the feeling that their worries are responded to quickly and efficiently, thus lessening the magnitude of their problems.

## 6.5 Monitoring of grievances

To verify the process. all grievances activities should be monitored. Monitoring will be carried out for the following indicators:

1. Number of received grievances monthly (Channel, gender, age, basic economic status of the complainants should be mentioned)
2. Type of grievance received (according to the topic of the complaint)
3. Number of grievances solved
4. Dissemination activities done
5. Satisfaction with solutions
6. Documentation efficiency
7. Efficiency of response to grievance provided

## 6.6 Disclosure of grievances

All grievances activities should be disclosed in the municipalities, CBOs and PWA website. A monthly report should be prepared for the most frequent grievances faced and how they were solved. This report will be disclosed through the PWA website, CBOs, municipalities.

## 7 Responsibilities for Monitoring and Reporting

Monitoring and documenting activities to be undertaken by the Social Development Officer in the environmental and social unit are described below:

- Reviewing and revising, as needed, the list of stakeholders to ensure that the register is accurate and complete;
- Monitoring consultation activities conducted with government representatives and local communities;
- Monitoring the effectiveness of the engagement process in managing impacts by tracking feedback received during engagement activities;
- Reviewing/auditing the implementation of SEP;
- Monitoring and responding to grievances received; and
- Reviewing and revising, as needed, the engagement activities programme to determine if additional activities are required.

All engagement activities are being documented by the E&S Team in order to review records and track performance.

The E&S will measure the performance of the SEP by documenting and tracking the indicators outlined in Table 7.1 below.

**Table 7-1: Proposed Stakeholder Engagement Performance Indicators**

<b>Annual review of publically-available Project documents such as PIDs, flyers, website documents and other documents</b>	<ul style="list-style-type: none"> <li>• Assess whether publically-available Project documents are up-to-date</li> <li>• Assess cultural appropriateness of publically-available Project documents</li> <li>• Assess level distribution documents to ensure they are available to communities in the area of impact</li> </ul>	<ul style="list-style-type: none"> <li>• Date of publically-available Project documents; frequency of distribution</li> <li>• Level of understanding of documents by stakeholders</li> <li>• Level and location of distribution</li> </ul>



<b>Quarterly review of consultation activities</b>	<ul style="list-style-type: none"> <li>Assess level of engagement with stakeholders through formal and informal means (e.g., meetings with government agencies, FGDs, public meetings; other community engagement)</li> <li>Track issues raised by stakeholders</li> <li>Ensure that issues are responded to in a timely manner</li> <li>Ensure consultation activities include awareness raising about GM</li> </ul>	<ul style="list-style-type: none"> <li>Number of engagement activities, (including place, time and number of participants involved)</li> <li>Number and types of comments/feedback received by stakeholders</li> <li>Number and timing of responses to comments received</li> <li>Qualitative assessment of awareness of community stakeholders of GM through stakeholder engagement process</li> </ul>
<b>Quarterly review of community grievances</b>	<ul style="list-style-type: none"> <li>Assess whether grievances are correctly classified</li> <li>Identify trends in grievances</li> <li>Ensure grievances are being addressed</li> </ul>	<ul style="list-style-type: none"> <li>Number grievances by level and type</li> <li>Number and percentage (%) of grievances closed according to level and type</li> <li>Timeframes for resolution (and closure) by grievance level and type</li> <li>Number of repeat grievance from the same stakeholder</li> <li>Qualitative assessment of awareness of community stakeholders of GM through stakeholder engagement process</li> </ul>
<b>Annual review of grievance mechanism</b>	<ul style="list-style-type: none"> <li>Assess compliance with the grievance management process</li> <li>Evaluate progress in achieving GM objectives</li> <li>Identify improvements and update GM</li> </ul>	<ul style="list-style-type: none"> <li>Level of compliance with process</li> <li>Completeness of grievance log</li> <li>Number of grievances by level and type</li> <li>Timeframes for resolution (and closure) by grievance level and type</li> <li>Number and % of grievances closed according to level and type</li> <li>Number of satisfied responses from complainants by grievance level and type</li> </ul>

		<ul style="list-style-type: none"> <li>• Number of repeat of a grievance from the same community stakeholder</li> <li>• Qualitative assessment of awareness of community stakeholders of GM through stakeholder engagement process</li> <li>• Qualitative assessment of trust in grievance management process through stakeholder engagement.</li> </ul>

## 7.1 Internal Reporting

The SDO will produce quarterly reports for the Unit Manager that summarise the stakeholder engagement activities undertaken during the quarter. The report will include a summary of issues raised by stakeholders and responses from the Project, including any corrective actions or mitigation measure undertaken to address issues.

## 7.2 Public Reporting

The Project will report annually to stakeholders on the outcomes of engagement and grievance management. The public report will be prepared in a manner that is culturally appropriate with supporting documents, as necessary.

The report will include information relating to:

- project activities and timelines;
- summary of engagement activities;
- any changes to the SEP (with rationale);
- summary of grievances.

The public report will be available via the PWA website and copies will be shared with the Ministries and the municipalities.