A large circular graphic with a gradient from light green at the top to blue at the bottom. The center of the circle is a white circle containing a photograph of a city street with modern buildings and a large pile of rubble in the foreground.

# Beirut Critical Environment Recovery, Restoration & Waste Management Program (P176635)

## Stakeholder Engagement Plan

February 2022

## Document Control Sheet

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## Acronyms and Abbreviations

ACM	Asbestos-containing Material
AN	Ammonium Nitrate
CDR	Council for Development and Reconstruction
CDW	Construction and Demolition Waste
CSO	Civil Society Organization
DW	Demolition Waste
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
EU	European Union
GBV	Gender Based Violence
GM	Grievance Mechanism
ISWM	Integrated Solid Waste Management
LFF	Lebanon Financing Facility
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MoE	Ministry of Environment
NGO	Non-governmental Organization
OPs	Obsolete Pesticides
PMU	Project Management Unit
PoB	Port of Beirut
RDNA	Rapid Damage and Needs Assessment
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SWM	Solid Waste Management
TPMA	Third-Party Monitoring Agency
UNDP	United Nations Development Programme
WBG	World Bank Group

# 1. Project Description

## 1.1 Project Background

The Port of Beirut (PoB) explosion on August 4, 2020 devastated Beirut city, killing at least 217 people, wounding more than 6,000 and displacing about 300,000 individuals. In addition to causing extensive damage to homes, businesses, infrastructure, and disrupting city's economic activity, the explosion created multiple environmental challenges. A Rapid Damage and Needs Assessment (RDNA) was carried out jointly by The World Bank Group (WBG), European Union (EU) and United Nations Lebanon, immediately after the explosion to assess the impact of the disaster on the population, changes in economic flows, physical assets, infrastructure, and service delivery in Beirut. The RDNA assessed the damages and needs of 16 sectors and estimated the damages to be between US\$3.8 - 4.6 billion and losses between US\$2.9 - 3.5 billion. Physical damages to the environment sector were assessed between US\$20 - 25 million and the recovery and reconstruction needs were estimated at US\$75 - 100 million<sup>1</sup>.

The PoB explosion is believed to have occurred due to the ignition of about 2,750 tons of Ammonium Nitrate at the port and can be attributed to the poor management and storage of chemical and hazardous substances. The disaster is also evidence to the overall weak regulatory oversight of chemicals and hazardous materials in Lebanon. The RDNA has also noted that large quantities of Obsolete Pesticides, pharmaceutical products and chemical substances were also stored at PoB at the time of the explosion. The presence of these materials and destruction of large number of houses and other structures has led to the generation of various waste streams<sup>2</sup>.

The PoB explosion has also caused other environmental impacts, such as (i) significant damage to municipal solid waste management (SWM) infrastructure - sorting facility at Karantina and composting facility at Coral, (ii) polluting the marine ecosystem around the explosion site; (iii) loss of green cover/vegetation in the city of Beirut; and (iv) potential increase in dust levels (suspended particulate matter, SPM) that could contain asbestos particles, during the demolition, rehabilitation and reconstruction of damaged buildings.

The presence of hazardous waste materials in the various streams generated due to the explosion, poses direct and immediate threat to the population and overall environmental quality of Beirut. The waste materials present at PoB and other locations outside the port, are poorly controlled. In addition, the absence of containment and control measures at these locations is posing threat to the public health and need urgent actions to contain and safe disposal of these waste materials. Given the hazardous nature of the material stored, the soil at these storage sites is also likely to have been contaminated and could require remediation.

Several international agencies and foreign government including the EU, the Government of Germany, the Government of France, the Netherlands Enterprise Agency UNDP, UN Environment, UN-Habitat and UN Children's Fund (UNICEF) are providing technical assistance to Lebanon in addressing the environmental impacts of the explosion. However, an integrated approach and institutional co-ordination is needed for the long-term environment recovery of Beirut.

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<sup>1</sup> WB/EU/UN, "Beirut Rapid Damage and Needs Assessment," 2020.

<sup>2</sup> UNDP, "Demolition Waste Assessment Outside the Port of Beirut.," 2020.

## 1.2 Purpose of the Project

The project aims at responding to urgent and critical environmental issues arising out of the PoB explosion on August 4, 2020, and minimizing/mitigating public health and environmental risks. The interventions, more specifically designed towards the management and disposal of demolition waste generated from the damaged buildings and asbestos contaminated waste, rehabilitation of damaged solid waste infrastructure and technical assistance measures for their sustainable operation.

## 1.3 Project Components

During project preparation, the Government and the Port Authorities have secured in principle alternative funding for the cleanup and management including recycling of waste materials in the Port Area. Lebanon Financing Facility (LFF) funding is therefore not required for this purpose. In view of this, project activities have been identified to meet priority and critical environmental interventions in areas outside the Port that were affected by the 2020 explosion, in particular the nearby solid waste management facilities that serviced large parts of the Beirut metropolitan area and the Bakalian site where construction and demolition waste is managed from parts of Beirut that were damaged by the port explosion. To maximize the project outcomes within the limited funds available under 3RF, the interventions were also prioritized based on the proposed/planned initiatives by other development partners and accordingly, the project activities are designed comprising the following three main components.

### **Component 1. Rehabilitation of damaged solid waste management infrastructure and management of asbestos-contaminated debris generated due to PoB explosion (USD 8 million)**

**Subcomponent 1.1 Management of asbestos-contaminated debris generated in the explosion affected areas of Beirut (USD 2 million):** The Bakalian Site near the port area was assigned by Beirut's Governor to receive construction and demolition waste generated after PoB explosion and has authorized Rubble to Mountain (RtM) Consortium<sup>3</sup> to manage the site. According to RtM, the Bakalian site has received 150,000 tons since the port explosion of Construction and Demolition Waste (CDW). There is evidence that part of the waste materials that entered the site are contaminated with asbestos. The consortium has developed protocols for safe management and has since stopped receiving asbestos contaminated waste. A technical due diligence of the operations at the site was carried out and based on this assessment, the project would particularly focus on the safe management of asbestos-contaminated waste materials at the Bakalian site and to support where possible more broadly the safe management of these waste materials in the Beirut area. In line with this, the following activities will be supported:

- **Management of asbestos contaminated debris on site.** The project will finance robust testing and management activities to separate asbestos contaminated (including more than 0.1 percent asbestos) from uncontaminated CDW where feasible and adequately manage the contaminated fraction to prepare for transport from the site for safe disposal.
- **Identification and preparation of disposal site for asbestos contaminated CDW**

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<sup>3</sup> Rubble to Mountains consortium is composed of an NGO - Lebanon Reforestation Initiative (LRI), a private firm-Development Inc SAL and AUB Neighborhood Initiative. It has received limited financial support from UN-Habitat and UNICEF, towards overall management and technical assistance, provision of some equipment including a crusher for the operations at the site.

MoE has identified a shortlist abandoned quarries as potential site for asbestos contaminated CDW disposal. The project will support the final site selection, planning, public consultations, and legal process to acquire and develop the selected site. This activity will then further include the preparation of the site to receive asbestos contaminated CDW and the transportation and management of materials generated as a result of the PoB explosion. If possible, the project would support the development of this disposal site to serve Beirut more comprehensively and for a longer term to receive these and similar waste materials, beyond the current quantities from the Bakalian site. The development of waste disposal site is complex and may face (public) opposition.. If towards the end of 2<sup>nd</sup> year of the project, the GoL has not been able to secure a location for waste disposal and contaminated CDW cannot be removed from the site(s), the project will, alternatively, finance the long-term safe containment of these materials at these sites based on best environmental practices.

- **Recycling of uncontaminated CDW.** The project can support the recycling of uncontaminated CDW through technical assistance in the form of mobilizing international management capacity, local capacity building and analytical work to support the application of recycled CDW in Lebanon's construction sector. The activities however would be initiated after necessary operational and environmental permits are obtained for recycling activities at the Bakalian site as well as for the potential quarry site to be identified by the Ministry of Environment or other such site.

**Sub-component 1.2 Rehabilitation of severely damaged solid waste management facilities serving Beirut area (USD 5.4 million):** This subcomponent will finance the assessment and partial rehabilitation of one or more severely damaged solid waste management facilities that have been directly impacted by the port explosion. These include two large facilities, Karantina for the sorting of Beirut's mixed household waste for the extraction of recyclables and Coral for composting of the segregated organic fraction, are located adjacent to the port area and both these facilities were seriously damaged due to PoB explosion. Activities include:

- **The rehabilitation process for the damaged waste management facilities will follow a Build Back Better (BBB) and Greener approach** through (i) enhancing the overall waste management system (collection, transportation, receipt, sorting, composting, baling, etc.), as well as (ii) upgrading technologies, and environmental control measures.
- To ensure the above, **the project will develop a detailed rehabilitation and operational plan for Karantina and Coral facilities**, which will evaluate the (i) design, technical and sustainability aspects of these plants, (ii) develop a rehabilitation plan (including optimum capacity and appropriate contracting arrangements for operation) and (iii) specific strategies for the integrating with waste collection system of Beirut.

**Sub-component 1.3 Piloting ISWM in the selected explosion impacted areas of Beirut (US\$0.60 million)**

This subcomponent will support implementation of demonstration pilot(s) on integrated solid waste management (ISWM) in the selected area(s) explosion impacted areas of Beirut. This includes recycling, reuse and composting to achieve minimum/ zero waste to landfills. The pilot will be implemented by specialized NGOs/agencies selected through competitive bidding process. To promote equitable participation, women-led NGOs will be encouraged participate. The design and implementation of the demonstration pilot(s) also seeks to closely engage local communities and vulnerable groups in the selection of areas for the pilot, design of ISWM approach and evaluating the performance of the pilot.

## **Component 2. Policy and institutional support for greening Beirut's Reconstruction Agenda (USD 0.5 million)**

**Sub-component 2.1. Establishment of a collaborative platform for stakeholders' engagement and planning priority actions for greening Beirut's reconstruction agenda (USD 0.3 million)** with participation of citizen groups, NGOs, and academia, including marginalized interest groups. Relevant government institutions such as MoE, PoB, Municipality of Beirut, and other institutions will also be included in the Platform. This sub-component will also support the identification and prioritization of strategic and sustainable activities aiming at greening the reconstruction agenda of Beirut city and Port of Beirut and which will be based on specific action plans to respond to priority issues covering (i) mitigation of Environment, Health and Safety risks; (ii) SWM action plan for Beirut city, (iii) integrating climate considerations in the reconstruction agenda; and (iv) engagement plans to adequately address barriers to participation of women and men and identify actions in greening the reconstruction agenda meeting gender-differentiated needs and interests.

**Sub-component 2.2. Strengthening monitoring and enforcement for the management of critical hazardous and chemical substances (USD 0.2 million):** This sub-component will support environmental monitoring and enforcement activities for the management of hazardous waste in Beirut based on national mandates and international experiences, to prevent similar incidents in future. This will entail working closely with mandated monitoring and enforcement agencies and coordinating with concerned government institutions. This will initiate the set-up of a baseline that could build towards a continuous environmental monitoring protocol and database which can be made publicly available. The sub-component will also support development of an appropriate mechanism that may be used for possible future clean-up and remediation operations.

## **Component 3. Project Management (US\$ 1.5 million).**

**This component supports project management activities to be carried out by UNDP as an intermediary agency.** These include, (i) overall project management, fiduciary, and safeguards compliance, (ii) conducting/ managing necessary technical, financial, environment and social safeguard studies, (iii) supporting technical assistance and institutional strengthening measures, (iv) developing and implementing a monitoring and reporting plan to provide visibility of the results and a transparent model for the development and implementation of all activities. A Project Management Unit (PMU) will be established by UNDP for this purpose. In addition, a Third-Party Monitoring Agency (TPMA) will be engaged at the level of LFF to undertake independent result verification of all projects and their activities and ensure a transparent and equitable implementation.

The project activities are expected to directly benefit an estimated 350,000 individuals (7.1% of the Lebanese population) living in Beirut<sup>4</sup> through the (i) containment and disposal of asbestos-contaminated debris generated from the Beirut explosion and which is stored and / or dumped at Bakalian site in Beirut and (ii) rehabilitation and sustainable operation of damaged solid waste infrastructure. In addition, the policy and institutional support through component 2, the project will provide necessary enabling framework for Beirut's reconstruction agenda, which will benefit larger population.

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<sup>4</sup> EU/CAS/ILO, "Labor Force and Household Living Conditions Survey (LFHLCS) in Lebanon Report," CAS and ILO, 2018–2019.

The indirect beneficiaries of the project will be all inhabitants of Mount Lebanon (2,032,600 individuals<sup>5</sup>) who would be benefiting from the operation of rehabilitated solid waste infrastructure and the population of Beirut who will benefit from improving urban environmental quality due to the safe management of contaminated CDW.

## **1.4 Project Location**

Although not all subprojects have been completely defined, for the purpose of this document, the Project area has been defined as the area where the Bakalian Site, Coral Compositing Facility and Karantina Sorting Facility are located (Figure 1-1). Once additional sites have been identified, such as the quarry sites for potential asbestos contaminated CDW disposal and pilot activities under Sub-component 2.2, this SEP will be updated accordingly.

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<sup>5</sup> Ibid

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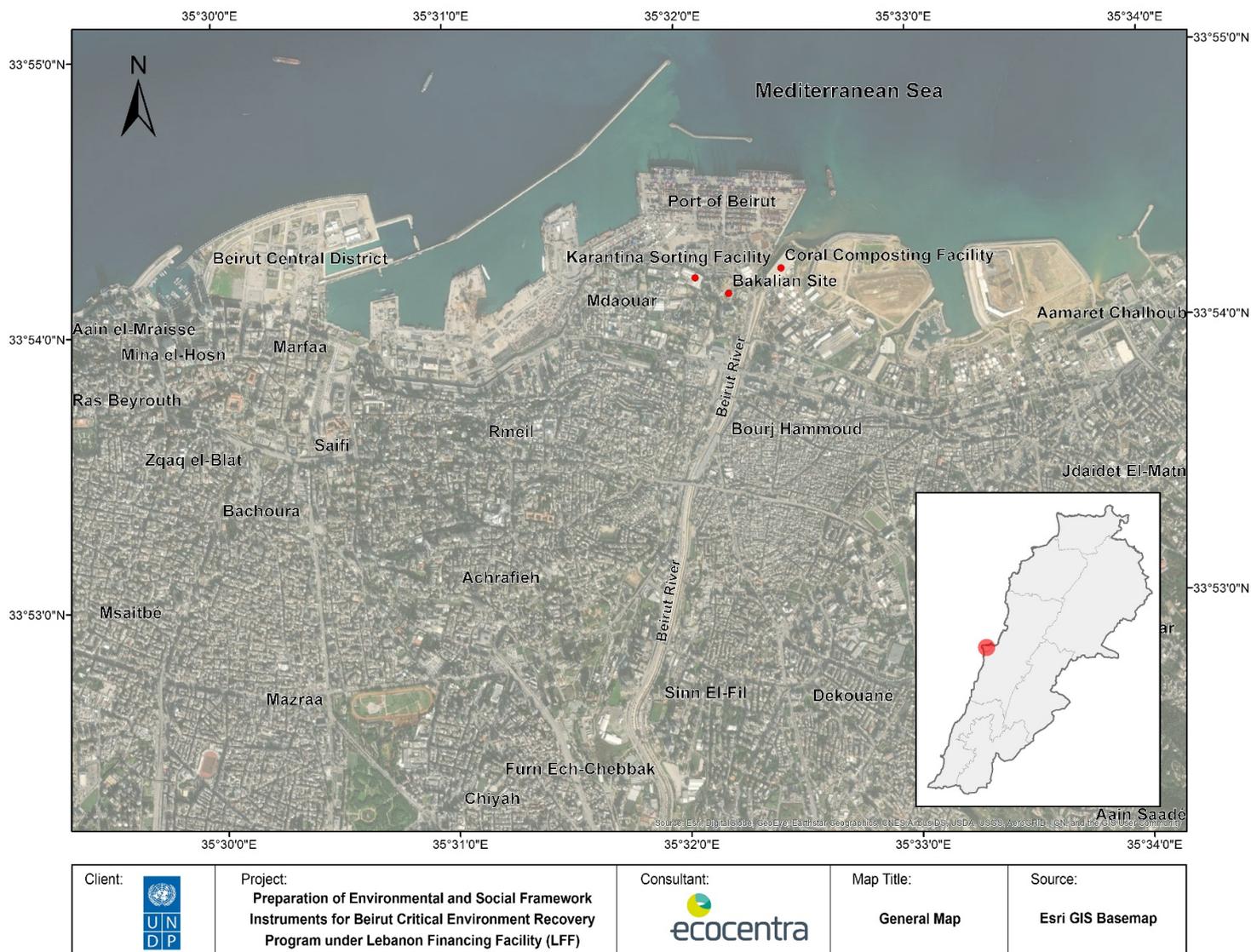


Figure 1-1: Location of Defined Project Components (as of 3 February 2022)

## 1.5 Purpose and Scope of the SEP

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The Preliminary 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 all identified stakeholders is essential to the success of the project in order to ensure smooth collaboration between project staff and stakeholders and to minimize and mitigate environmental and social risks related to the proposed project activities.

The SEP is a live document that is periodically updated as the information that is required to be disclosed may change, including changes in the project design, schedule or project area of influence. New stakeholders might be identified at a later stage and should therefore be included in an updated SEP.

The overall objectives of SEP as stated in the World Bank Environmental and Social Framework (ESF) Environmental and Social Standards 10 (ESS10) are to:

- Define the roles and responsibility of all identified stakeholders and ensure their participation in all stages of the project cycle;
- Develop a systematic approach to stakeholder and citizen engagements that will help to identify stakeholders and build and maintain a constructive relationship with them;
- Evaluate the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance;
- Encourage and provide means for effective and inclusive engagement with project-affected parties throughout the project cycle on issues that could potentially affect them;
- Safeguard that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format taking special consideration for the disadvantaged or vulnerable groups;
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the PMU to respond to and manage such grievances.

Specifically, SEP serves the following purposes:

- Stakeholder identification and analysis;
- Planning how the engagement with stakeholder will take place;
- Disclosure of information;
- Consultation with stakeholders;
- Addressing and responding to grievances;
- Monitoring and reporting on SEP.

## **2. Brief Summary of Previous Stakeholder Engagement Activities**

Proceedings of previous stakeholder consultations conducted under the Project will be included at a later stage. This will include the following:

- Summary of feedback
- Date of consultations
- Number of participants and entities they represented
- Key comments and concerns raised during the consultations.

During the Environmental and Social Management Framework (ESMF) review period, the first consultation session was conducted virtually on 17/2/2022. Over 200 entities and experts were invited and over 20 attended of which 12 were women. In the consultation the project components, ESMF and other ESF instruments that have been prepared or will be prepared was presented and stakeholder feedback was solicited.

The consultation meeting lasted for almost two hours, during which the parties were introduced to (1) the LFF objectives (2) the LFF / ENV program objectives, components, and activities, (3) the environmental and social impacts of the project along with the proposed mitigation measures, and (4) the grievance mechanism to be followed during project implementation.

In addition, the meeting opened the floor for discussion whereby participants expressed their appreciation for the project and asked for further information regarding the institutional arrangements, the economic sustainability of the interventions and the environmental governance. Attendees also highlighted that the project should ensure a proper and robust collaboration with existing platforms and initiatives thus avoiding any duplication of efforts and funds. The participants were representatives from governmental institutions and non-governmental bodies (NGOs, academic and international organizations). Attendees and proceedings of the meeting can be found in Annex 1 of this SEP.

While stakeholder engagements for the asbestos contaminated CDW landfill will be conducted upon identification of the selected quarry site, additional consultations will be conducted as indicated in the stakeholder engagement program below.

### **3. Stakeholder Identification and Analysis**

The Project is expected to be highly visible to different stakeholders and media channels so that a strong communication strategy should be in place. Also, reputational risk due to the engagement of various agencies on different activities under the project needs to be considered. In addition, involvement of other bodies, such as in subsequent waste disposal activities that are not part of the Bank project, may be seen as part of the Bank's involvement in the project. Therefore, clear communication on WB engagement and any possible associated activities is needed to avoid such risks.

In addition, given the range of stakeholders active in Lebanon on the (environmental) restoration agenda, their varying interests and limited governance structures to rule this agenda, the project will support a pro-active and inclusive stakeholder and citizen engagement process and develop inclusive communications and a stakeholder engagement plan as per the ESS10 requirements under the ESF aiming to maintain close consultation with the different public and private stakeholders and civil society in preparation and implementation of the project and related ESF instruments.

In accordance with the ESS10, this SEP categorizes the stakeholders into three groups in order to ensure a more efficient and effective stakeholder engagement:

- Affected parties - stakeholders that are affected or may be affected by the project;
- Other interested parties - other parties who may have an interest in the project.
- Vulnerable/ disadvantaged groups - individuals or groups who may require special engagement efforts due to their vulnerable status.

#### **3.1 Affected Parties**

In line with the ESF, affected parties include individuals, groups, local communities, and other stakeholders that may be directly or indirectly affected by the project, positively or negatively, with focus on those directly and adversely affected by Project activities. Affected Parties identified at this stage of the Project are:

- Local communities within the project's impact zones. This includes residents within the area affected by the explosion mainly Bourj Hammoud, Karantina, Mdawar in close proximity to Bakalian site, Katarina sorting facility and Coral composting facilities.
- Local communities in close proximity to the hazardous waste disposal site.
- Previous workers at the Coral Compositing Facility and Karantina Sorting Facility
- Owners of recycling facilities in Beirut that used to receive recyclables from Karantina sorting facility
- Owners of quarry sites that may be considered for disposal of contaminated waste.
- Design, supervision and contracting companies, local companies and their employees and workers who will be involved in the implementation of different SWM activities under different project components.
- Relevant government institutions such as Ministry of Environment (MoE), Port of Beirut (PoB), Ministry of Interior and Municipalities, municipalities within explosion impacted areas.

## 3.2 Other Interested Parties

Other interested parties include broader stakeholders who may be interested in the project because of its location, its proximity to natural or other resources, or because of the sector or parties involved in the project. Other interested parties include, among others, government institutions that may be involved in various ways in the project as well as academia, civil society organizations (CSOs), international organizations, and the media. Identified entities include but are not limited to:

- Specialized environmental NGOs/ agencies that may be involved in implementing integrated solid waste management (ISWM) pilot projects in the selected area(s) explosion impacted areas of Beirut:
  - ACF Spain
  - ACTED
  - Arc-en-ciel
  - Compost Baladi
  - Ecoserv
  - Green Area
  - Lebanon Eco Movement
  - Lebanon Environment Forum
  - Lebanon Reforestation Initiative (a member of the Rubble to Mountains consortium)
  - Live Love Beirut
  - Live Love Recycle
  - Waste Management Coalition
  - Zero Waste Coalition
- NGOs and entities providing social services (including psychosocial services) to residents, refugees, disabled, and Gender-Based Violence (GBV) survivors (including LGBTQ community):
  - 1 More Cup
  - AH Law firm
  - American Near East Refugee Aid (ANERA)
  - Development inc.
  - Diane Foundation
  - DT care
  - HEAL NGO
  - Khaddit Beirut
  - LCPS
  - Muwatin Lebneine
  - People to people aid
  - Proud Lebanon
  - Shabake Project
- Order of Engineers and Architects – Beirut
- Ministry of Social Affairs: Social Development Centers
- Ministry of Public Health Primary Health Care Centers

- Schools operating within the Project area
- Municipality of Beirut and Municipality of Bourj Hammoud: Employees in charge of recovery activities
- International organizations: International Rescue Committee, UNFPA, UNICEF, UNHabitat
- Media
- Academic Institutions and research centers/labs including the American University of Beirut (AUB) and its Neighborhood Initiative, Centre for Nature Conservation, Beirut Urban Lab and Laboratories for the Environment, Agriculture, and Food (LEAF), the University of Saint Joseph, the Lebanese University, the National Council for Scientific Research, Balamand University, and the Lebanese American University

### **3.3 Disadvantaged/Vulnerable Individuals or Groups**

Disadvantaged and vulnerable groups are persons who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their representation in the consultation and decision-making process associated with the Project. The Project Team will take an effort to ensure that the vulnerable and disadvantaged groups are aware about the proposed project activities and has a possibility to submit their propositions/suggestions.

The following represents a preliminary list of vulnerable categories:

- Waste pickers within the area affected by the explosion.
- Low-income households who are recipients of social assistance;
- Elderly people;
- Households with people with disabilities;
- Female-headed households
- Residents living in partly damaged housing units;
- Displaced residents;
- Refugees;
- Informal labour and migrant domestic workers

During Project implementation, other vulnerable groups who may be affected by the Project may be identified with support from local governmental and non-governmental organizations, as well as refugee support organizations. These will be included in updated versions of this SEP.

### **3.4 Summary of Project Stakeholder Needs**

Table 3-1 presents a summary of stakeholder needs in terms of language, notification needs and other specific requirements to ensure their participation in any consultation process and information dissemination.

**Table 3-1: Project Stakeholder Needs**

*Stakeholder Engagement Plan for  
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<b>Community</b>	<b>Stakeholder Group</b>	<b>Key Characteristics</b>	<b>Language Needs</b>	<b>Preferred Notification Means (e-mail, phone, radio, letter)</b>	<b>Specific Needs (accessibility, large print, child care, daytime meetings)</b>
Beirut	Women and vulnerable people	Limited availability (due to work or home responsibilities)	Arabic	Written information, public consultation referrals, newspaper ads, phone	Day time meetings, late afternoon
Beirut	Refugees	Some are informal.	Arabic	Through NGOs working with refugees, verbal communication	Graphics
Beirut	People with Disabilities and Older Persons	Some have access issues.	Arabic	Written information, referrals, public consultation, newspaper ads, and phone	Accessibility facilities (ex. avoid stairs and large gatherings), large print
Beirut	Migrant community	Some are informal and have language issues	Arabic or specific language (if applicable)	Through NGOs working with these communities, verbal communication	Graphics

## **4. Stakeholder Engagement Program**

### **4.1 Purpose and Timing of Stakeholder Engagement Program**

The purpose of stakeholder engagement for this project is as follows:

- Create public awareness among stakeholders on the objectives and immediate action plans of the project at hand (ongoing);
- Consult on the project detailed components/design (for disposal site, rehabilitation of waste management facility, ISWM pilot project, SWM action plan) (early implementation phase);
- Obtain feedback from stakeholders on the implementation and adapt as needed (periodic, throughout implementation phase). In addition, they will be informed on how and when information will be made available to them and about forthcoming opportunities to review information and provide their feedback and views.

### **4.2 Proposed Strategy for Information Disclosure**

Table 4-1 provides a preliminary description of 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 during different project phases. The table, like the entire document, is an evolving tool and can be updated at any point during project preparation and implementation as deemed necessary.

**Table 4-1: Proposed Strategy for Information Disclosure**

Information to be Disclosed	Methods Proposed	Locations/ Dates	Target Stakeholders	Responsibility
Preparation Phase				
ESMF SEP Labour Management Procedures (LMP) Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH) Plan	Posting digital copies online Physical copies available	As soon as each individual E&S document is completed of UNDP Bourj Hammoud and Beirut Municipality Premises	Project affected persons, vulnerable groups, and other interested parties	UNDP
ESIA Scoping Report ESIA ESMP	Posting digital copies online	As soon as each individual deliverable is completed Website of UNDP	Project affected persons, vulnerable groups, and other interested parties	UNDP
Implementation Phase				
Brief project description on purpose of project, project components, activities and location, E&S safeguards adopted, public consultation and GM process and contact information.	Post project flyer in various locations and digitally Send digitally to residents / community representatives / NGOs	Upon project commencement Website and social media platforms of UNDP Bourj Hammoud and Beirut Municipality Premises	Project affected persons, vulnerable groups, and other interested parties If needed, separate meetings could be held with vulnerable groups	UNDP / PMU
GM including referral pathways for SEA/SH related complaints	Posting digital copies online Poster on community bulletin board Sign board at Project sites	Upon and during the project implementation (continuous) Website and social media platforms of UNDP Bourj Hammoud and Beirut Municipality announcement boards	Project affected persons, vulnerable groups, and other interested parties	UNDP / PMU

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Information to be Disclosed	Methods Proposed	Locations/ Dates	Target Stakeholders	Responsibility
Updated project information along with updated construction/implementation schedules	Distribution of project updates in public notice locations	Before the start, during and at the end of any construction/implementation activity as well as when key project activities change	Project affected persons, vulnerable groups, and other interested parties  If needed, separate meetings will be conducted with women and other vulnerable groups	UNDP / PMU
Findings of the ESIA/ESMP for the landfill sites selected  Information on the landfill sites selected for the disposal of hazardous waste  Updates on the progress of the hazardous waste landfill sites selected and E&S associated impacts	Distribution of project updates in public notice locations  Posting digital copies online  Website of UNDP	Before the start of any site preparation activities and during the start of project activities	Project affected persons, landowners of selected quarry sites, vulnerable groups, and other interested parties  If needed, separate meetings will be conducted with women and other vulnerable groups	UNDP
Focus group discussions with project affected persons/landowners of quarry sites to present any due diligence measures for specific monitoring and/or management measures required (if any). To present administrative measures that earmark the site as 'site containing waste materials' for restrictions on future land-use, in case the land gets	Distribution of project updates in public notice locations, outreach to the landowners, email, contact by phone	Before the start of any site preparation activities and during the start of project activities	Project affected persons/landowners of quarry sites	UNDP / MOE

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Information to be Disclosed	Methods Proposed	Locations/ Dates	Target Stakeholders	Responsibility
<p>involved in land transactions and / or redevelopment.</p> <p>To present the commitments of the disposal site's owner that would be captured in a tripartite agreement between the owner, MoE and the correspondent Municipality.</p> <p>Project grievance mechanism</p>				

## 4.3 Proposed Strategy for Consultation

Public consultations will be organized for ESF documents, as well as site specific ESIA and other ESF documents. Moreover, public consultations will be held on an ongoing basis as part of the stakeholder engagement process during the project cycle.

Equal participation of women and men across all stakeholders' groups will be observed to guarantee fair representation of needs and concerns. Moreover, separate meetings will be held for female participants to solicit views and discuss sensitive issues such as GBV and sexual exploitation and to overcome participation barriers. Similarly, cultural and language barriers may hinder the participation of migrant domestic workers, for this purpose identified organizations working with this at-risk group will be consulted/partnered with to guarantee their participation.

Table 4-2 The table below presents key stakeholder engagement activities to take place during the project preparation stage through to implementation. Additional activities can be included following consultations with project beneficiaries, stakeholders and contractors if these are deemed useful and necessary. The table, like the entire document, is an evolving tool and can be updated at any point during project preparation and implementation.

During project preparation, alternative methods to the traditional public consultation session may need to be implemented taking into account national requirements regarding Covid-19 pandemic and World Bank's "Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings".

**Table 4-2: Proposed Strategy for Consultation**

Topic of Consultation	Method used	Location and Dates	Target Stakeholders	Responsibilities
Preparation Phase				
Proposed project components	Focus groups/interviews/workshops; virtual public hearings Placement on social media platforms and website of UNDP	During ESMF review period as soon as each individual deliverable is completed	Project affected persons, vulnerable groups, and other interested parties	UNDP
Stakeholder consultation on all E&S instruments: ESMF LMP SEP Grievance Mechanism (GM)	Emails, letters to stakeholders with appropriate background information  Posting on social media platforms and website of UNDP  Focus groups	During ESMF review period/preparation phase of the ESF instruments as soon as each individual E&S document is completed	Project affected persons, vulnerable groups, and other interested parties	UNDP
Site-specific ESIA and ESMPs SEA/SH Plan	Focus groups/interviews/phone calls; virtual public hearings Placement on social media platforms and website of UNDP	During the preparation of ESIA and ESMPs	Project affected persons, vulnerable groups, and other interested parties	UNDP
Implementation				
Beneficiary feedback survey	Survey of sample of affected residents to obtain their feedback on Project activities and performance, including effectiveness of disclosure activities and satisfaction with GM	Mid and end of Project	Project affected persons, vulnerable groups, and other interested parties	UNDP

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Topic of Consultation	Method used	Location and Dates	Target Stakeholders	Responsibilities
Selection of the new hazardous waste landfill and associated E&S impacts	Focus groups/interviews/phone calls; virtual public hearings Placement on social media platforms and website of UNDP	Upon selection of the sites Dates to be determined (during implementation)	Project affected persons, vulnerable groups, and other interested parties	UNDP

## **4.4 Proposed Strategy to Incorporate the View of Vulnerable Groups**

The vulnerable and disadvantaged groups will be engaged in all stages of project preparation activities and future interventions. The Project recognizes that vulnerable people require special consideration, as they might be unable to participate, to the full extent, in the consultation activities, and may also be disproportionately affected by some impacts.

All consultation activities will be planned to facilitate the active involvement of the identified vulnerable groups. Certain cultural and logistical elements such as physical access, gender, literacy levels, and time availability of vulnerable groups will be taken into consideration when planning any consultation and information disclosure activities.

Examples of giving special consideration and attention to marginalized communities and vulnerable populations includes conducting separate online meetings by women to communicate with the identified affected local women. This will be done through proper coordination with representatives of women's groups and NGOs in the area in order to take into account all factors that might encourage the widest participation of women in such meetings. Another is providing special access to persons with disabilities and the elderly during public meetings. The Consultant will also coordinate with the relevant municipality and NGOs dealing with the poor and vulnerable population, as well as with NGOs dealing with Syrian refugees and migrant workers in an effort to take the concerns of these groups into consideration.

The UNDP/PMU will closely monitor the consultation process to ensure access and awareness of the equal access to the consultation process and to guarantee that their voice is taken into account in order to find and implement solutions to some specific situations or issues.

Surveys will be distributed to beneficiaries at the end of the implementation phase of the different sub projects, in addition to randomized calls, to ensure that they did not face any issues with regards to the way the project was carried out and to ensure that the project provides them with the maximum benefits. Survey outcome and feedback will be documented.

## **4.5 Timelines**

The stakeholder consultation process will be an iterative process that will be carried out throughout the duration of the project. The SEP will remain on the UNDP website for the entire period of project development and will be updated on a regular basis and as needed as the project progresses through its various phases. This is 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**

Comments from all external stakeholders and beneficiaries will be gathered and reviewed systematically. Comments will be filtered and categorized into:

- Feedback regarding project activities and implementation
- Grievance and complaints

Feedback comments will be reviewed by UNDP/PMU and forwarded to the relevant team member and stakeholder group. Once all feedback is gathered, comments will be addressed back to stakeholders through formal communication highlighting the course of action that was/will be taken to address their comments.

Grievance and complaints comments will be shared with Project Manager. These comments will be addressed by their severity and importance and will utilize the GM outlined in Section 6 below.

## **4.7 Future Phases of the Project**

UNDP will issue periodic reports (every 3 months) on the environmental, social, health and safety performance of Project components during the entire implementation period, including the performance and implementation of the SEP and GM. Furthermore, updates on the implementation of the project will be periodically posted on the UNDP social media platforms and website.

## **5. Resources and Responsibilities for Implementing Stakeholder Engagement**

A PMU will be established at UNDP to implement the Project. Its staff will include a full-time Project Manager and a full-time Social/Gender Specialist. The Project Manager will be responsible to follow up on the implementation of this SEP, the GM and the provisions of the Environmental and Social Commitment Plan (ESCP). Resources have been allocated in the Project budget to ensure that all stakeholder engagement activities described in this SEP can be implemented.

The Social/Gender Specialist will be responsible for implementing the SEP. They will report to the Project Manager, who has overall accountability for all project activities and will be highly involved in the implementation of the SEP. The Project Manager will be responsible to sustain relationships and communicate with the relevant stakeholders as identified in this SEP. All outcomes of the stakeholder engagements will be documented in the regular progress reporting and as per the provisions of the ESCP.

Once the PMU has been established, this SEP will be updated to provide contact information for stakeholders who have comments or questions about the Project or the consultation process. This will include their title, phone number, address, and e-mail address.

In addition to the designation of a full-time Social/Gender Specialist for the duration of the Project that will support implementation of this SEP, budget has been allocated as follows:

- Awareness and information dissemination: USD 100,000;
- Operational cost (including workshops, meetings, etc.): USD 20,000.

## 6. Grievance Mechanism

The purpose of a grievance mechanism is to ensure that all feedback and complaints received from all identified stakeholders are documented, considered, and addressed in an acceptable and timely manner. A community GM will thus be set up for the Project and made available in affected municipalities, schools, community centers and other public places that are easily accessible for all relevant stakeholders and vulnerable groups, alongside a description of the GM prior to the implementation of the project and its sub-projects. The Social/Gender Specialist at the PMU will be the GM Focal Point responsible for setting up, implementing, and reporting on the GM.

This mechanism will follow the following principles:

- Grievances will be treated confidentially, assessed impartially, and handled transparently.
- The submitting and readdressing of the grievances will be free of charge for complainants.
- The PMU will ensure that all project-affected parties will have equal opportunity to submit their grievance in accessible way.
- The channels for filing a grievance, including verbal and anonymous means, will be disclosed during public consultations;
- The channels for grievance submission will be also disclosed near the project implementation site on project signboards and at the relevant municipality notice boards.
- Affected persons may raise a complaint at any time of project related activity.
- The GM is designed to be responsive to the needs of all complainants, including anonymous ones.
- All grievances, simple or complex, will be addressed and resolved as quickly as possible and as per the specified timelines.
- In cases where the aggrieved individuals or group is not satisfied with the outcome of the amicable mechanism, they will always be able to file to the court at any stage in the resolution process;
- In cases where the aggrieved individuals or group is not satisfied with the outcome of the amicable mechanism, they will present their case to the Governor of Beirut/Ministry of Environment
- Complainants have a right to appeal in case not satisfied with the resolution of their complaint
- If aggrieved individuals or group remain dissatisfied with the decisions they may take their case to the court and they will be reassured that they still have all their legal rights under their national judicial process.
- All grievances will be registered and documented, and each grievance resolution process and communication will be systematically tracked;
- Special pathway for SEA/SH grievances ensuring confidentiality and a survivor-centered approach as per the World Bank's Good Practice Note.

Any comments or concerns can be brought to the attention verbally or in writing by using the one of the following:

- Filling a form, and sending it an e-mail address (to be provided once the GM is set up):
- Contacting the PMU (GM Focal Point) either by phone, email or by registering a complaint/grievance through the project website. This information will be incorporated

once the GM is set up and will be maintained throughout project implementation. The SEP will accordingly be updated to reflect this information.

- Reporting directly to the relevant municipalities.

Receipt of a grievance will be acknowledged within five working days and responded to based on the priority of the grievance (as described below). The following figure presents a detailed flowchart describing the process of grievance starting from the reception of grievance to implementation of corrective measures.

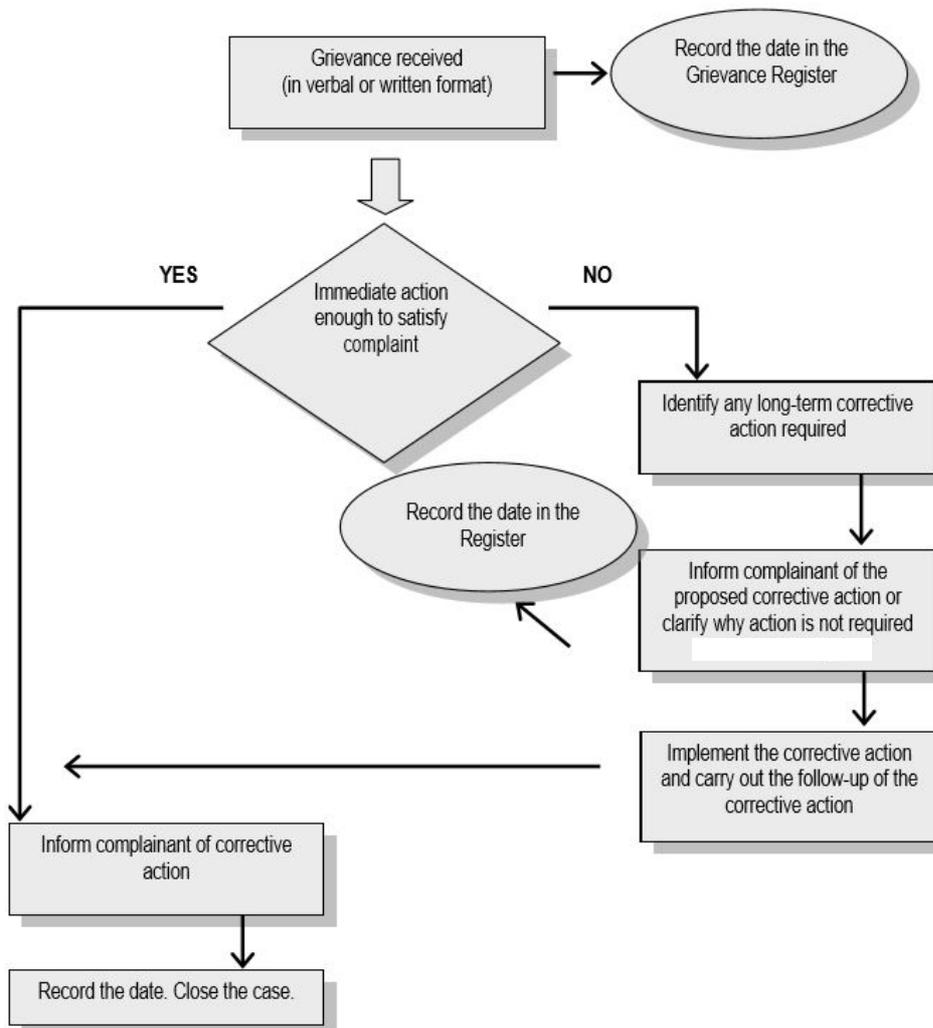


Figure 6-1: Grievance Process

Grievance information will be recorded in a grievance log by the PMU (Social/Gender Specialist), on a monthly basis during project implementation (using the sample log in Annex 2). This will include:

- Details and nature of the complaint;
- The complainant name and their contact details (Individuals can request the right to have their name kept confidential);
- Date;
- Length of time needed to close the complaint case;
- Corrective actions taken in response to the complaint;
- Feedback from the complainant once the actions have been implemented

Each case based on its priority (low, medium, high, critical) has a timeframe to be handled and resolved.

**Low priority cases** are not timebound. They are registered on the database and directly closed where the Feedback and Complaint Officers answers the beneficiaries' questions and close the case accordingly.

**Medium priority cases** are usually related to requests for assistance and need fifteen working days to be resolved.

**High priority cases** are related to dissatisfaction with quality of services, breach of code of conduct, etc.

**Critical priority cases** are major or sensitive complaints and are usually referred to the Project Manager to investigate.

High and critical priority cases need 48 hours to be handled unless they need investigation, upon which the processing might take up to 15 days.

Ongoing communication with the complainant is done throughout the process. UNDP acknowledge receipt of the complaint, thank the complainant for their feedback, and inform the complainant that the feedback will be handled in line with the GM. Decisions taken on the case is also shared back with the complainant once received and the GM Focal Point informs the complainant on the decision to close the case.

If the case was deemed not appropriate to investigate due to lack of needed information or other matters, then the UNDP/PMU provides an explanation to the complainant on the reasons behind this decision and acknowledging the closure of the case, or whether additional information is needed to complete the investigation process.

When SEA/SH reports are received, UNDP proceeds through the following steps:

- Project Manager is informed. Information and reports about the case, if on-paper, are kept in a sealed envelope at the UNDP headquarter office. Electronic safeguarding complaints are stored in a special database that is restricted to specific staff members.
- Support services are immediately offered to the survivor and their family members. Case management is done by qualified staff members, so that UNDP does not do harm to the individuals.
- No action is taken against or with the perpetrator until UNDP can advise on the best path forward.

Details of this system will be elaborated upon commencement of the Project.

Complainants are informed of their right to appeal the decision and that the case will be escalated. If the case was referred to the focal and the complainant was not satisfied with the decision, the complainant has the right to appeal the decision, and the case will be escalated to the Program Manager or Senior Management at UNDP for handling.

SEA/SH complaints shall be directly escalated to the Project Manager who will ensure confidentiality and a survivor-centered approach as per the World Bank's Good Practice Note and ensure referral of survivors to the relevant service providers where necessary. The

complaint shall be logged onto the GM log and will be documented as part of UNDP's regular progress reporting and as per the provisions of the ESCP. UNDP will ensure data confidentiality of all registered complainants.

Hotline numbers and/or e-mail addresses and/or websites will be identified once the PMU is established. The hours of operations of the GM shall be from Monday to Friday, 9AM-5PM.

UNDP shall promptly notify the Bank (within 48 hours) of any SEA/SH-related incident. UNDP shall submit a report to the World Bank on the incident and provide sufficient details regarding the incident, findings of the Root Cause Analysis, indicating immediate measures taken or that are planned to be taken to address it, compensation paid by responsible contractor, and any information provided by any contractor and supervising entity/consultant, as appropriate. The UNDP will ensure the incident report is in line with the Bank's Environment and Social Incidence Response Toolkit. A detailed incident report shall be provided within 10 business days of the initiation notification to the Bank, as requested.

## **7. UNDP with Monitoring and Reporting**

If necessary, the PMU will engage third party consultants to conduct independent monitoring of the E&S performance of the subproject, with periodic reporting to the PMU. Such external reports will also be provided to the Bank by the UNDP as part of bi-annual project progress reports. Furthermore, updates on the implementation of the project, will be periodically posted on the UNDP website and social media platforms, and discussed through virtual discussions/interviews that aim at addressing stakeholders as well as beneficiaries to publicly disclose the milestones being achieved throughout the lifetime of the project.

# Annex 1: Attendees and Proceedings of Public Consultation Meeting Held on 17/02/2022

**Location:** Zoom Application

**Date & Time:** 17/02/2022 from 12:00 pm to 1:40 pm

## Attendees:

Name	Institution
Government Entities	
Youssef Aziz	Council for Development and Reconstruction
Manal Moussallem	Ministry of Environment
NGOs	
Karim Irani	Norwegian Refugee Council
Makram Ouais	Lebanese Center for Policy Studies
Antoine Mouchati	Arcenciel
Eddy Bitar	Live Love Lebanon
Georges Bitar	Live Love Lebanon
Malek Ghandour	Lebanese Environment Forum
Nahida Khalil	Madinati & Waste Management Coalition
Reem Khattar	Nadeera
Samar Khalil	Waste Management Coalition
Academia	
Sophia Ghanimeh	Notre Dame University-Louaize
Farouk Merhebi	American University of Beirut
Private Sector	
Lam Bashour	Ecocentra
Sania El Nakib	Ecocentra
Joanna Zaghrini	Ecocentra
International Organizations	
Elie Mansour	UN-Habitat
Imad Nahhal	Food and Agriculture Organization
Noritaka Hara	UNDP
Jihan Seoud	UNDP

## Proceedings:

### 1. Welcome Remarks

The public hearing opened with a word from Ecocentra representative who introduced the overall project, its area, its components, its objectives and relevant organizations including the UNDP and the World Bank.

### 2. Presentation

The Expert from Ecocentra provided a detailed description of the project components, purpose of the hearing, ESMF process, project level instruments, Community Grievance mechanism, World Bank requirements, and listed the identified environmental and social

issues associated with implementation of the project and measures to assess and manage them.

### 3. Discussion

The floor was then opened for discussion and questions. The main issues that were raised are as follows:

- A Planning and Coordination Unit (PCU) is being set up at the Governorate level. This is a Bank-Executed Technical Assistance project that lays the foundation to coordinate, communicate and facilitate financing for Beirut's medium to long-term recovery strategy. It will cover environmental issues including the solid waste crisis. This PMU should operate under the PCU in order to achieve a clear and transparent management and prevent the establishment of many sub-units. **Response:** It was clarified that the PMU will coordinate closely at the governorate level and a Project Steering Committee will be created to officially involve relevant stakeholders ensure no duplication of work is being done.
- The funding amount is not sufficient for the rehabilitation of both the sorting facility of Karantina and the Coral composting facility. **Response:** It was clarified that the rehabilitation works will be limited to the available budget.
- Concerns about the economic sustainability of some activities in this project, especially during this economic crisis, were raised. **Response:** It was stated that feasibility of these activities will be studied during the project.
- Under the LFF project, the ESF instruments are published online and coordination with the different projects such as this must take place in order not to duplicate the work, for example such as the Community Grievance Mechanism, whereby the existing mechanism can be used. **Response:** All the instruments and the proceedings of this public consultation will be published online as required by the World Bank and all LFF activities are coordinated from the LFF secretariat.
- The capacities of the Karantina and the Coral facilities were not sufficient even before the explosion and since they are being rehabilitated, can their capacities be increased? **Response:** The possibility of increasing the capacity of these facilities will be studied and if feasible and budget is available, they will be expanded.
- What is the start date of the Project? **Response:** It is expected in April 2022.
- Is there any relation between this project and between the destruction of the Port of Beirut silos and the reconstruction of the Port. **Response:** This project is not related to the silos. Regarding the reconstruction of the port, its activities are limited to putting forth a greening agenda for the reconstruction efforts.
- One public hearing is not enough as the project is very complicated and encompasses different activities. **Response:** Every activity of this project related to solid waste management and rehabilitation/construction works will be subject an ESIA and thus to a public hearing when details on each activity have been developed.
- This project will work at the Bakalian site and many partners are working on this site too (management of glass and rubble). More details are needed about the project activities to avoid duplication. **Response:** All documents related to the project will be published regularly online and shared with the interested shareholders. In addition, coordination will be done at various levels to avoid duplication of work.
- This project should also include master planning for waste management that includes Jdeideh and Bourj Hammoud landfills too as they are in proximity of the Port of Beirut and have also solid waste issues. **Response:** Under component 2.1, it is envisioned that

technical support will be provided for the preparation of a solid waste action plan for Beirut city.

- Concerns were raised about using waste for sea reclamation as is common practice.  
**Response:** This project has exclusion criteria for any activities that adversely impact natural habitats and the sea is considered one of them.
- Recommend measures to ensure that this project or its subprojects will not accept any breaching of the mentioned social and environmental requirements.

## Annex 2: Grievance Log

Complainant Name and Contact Details	Date of Complaint Receipt	Details and Nature of the Complaint	Corrective Actions Taken	Date of Response	Status (Closed / Ongoing / Pending)