

Gaza Wastewater Management Sustainability Project

Stakeholder Engagement Plan (SEP)

Project No. : (P172578)

March, 2020

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Abbreviations and Acronyms

BLWWTP Beit Lahia Wastewater Treatment Plant

CBO Community Based Organization EQA Environment Quality Authority

ESMP Environmental and Social Management Plan

ESO Environmental and Social Officer

ESRS Environmental and Social Risks Summary

GRM Grievance Redress Mechanism GRS Grievance Redress Service

MCM Million Cubic Meter

NGEST North Gaza Emergency Sewage Treatment

NGWWTP North Gaza Emergency Wastewater Treatment Plant PENRA Palestinian Energy and Natural Resources Authority

PMU Project Management Unit PWA Palestinian Water Authority

SCADA Supervisory Control and Data Acquisition

SEP Stakeholder Engagement Plan

SMS Short Message Service
TPS Terminal Pump Station
USD United States Dollar
VFD Variable-frequency Drive

WASH Water, Sanitation, and Hygiene

WSM Wastewater Sustainable Management

WWTP Wastewater Treatment Plant

1. Introduction

1.1. Background

Beit Lahia Wastewater Treatment Plant (BLWWTP) was the only facility to deal with the collected sewage in the Northern Governorate in the Gaza Strip. As the sewage flows increased, the capacity of the plant to receive and treat such flows became insufficient, which led to overflowing from the treatment plant into the surrounding sand dunes, creating a lake of partially treated wastewater (the Beit Lahia Lake) since late 1990s. To address this situation, the North Gaza Emergency Sewage Treatment (NGEST) project, comprising the North Gaza Wastewater Treatment Plant (NGWWTP), the Terminal Pumping Station (TPS), the pressure pipeline, nine infiltration basins, and a recovery scheme was approved.

The flow received at the TPS is sometimes discharged into the adjacent lagoons (old BLWWTP), especially pond #7, and two random ponds to the north of Um Al Naser Village, due to unforeseen circumstances such as excessive flooding, electricity cut off, conflict, etc. These ponds do not have fences and their shoulders are not high enough, which means that the discharge of raw wastewater there threatens the safety and health of the population. Moreover, due to the lack of financial resources to properly manage the disposal of the sludge produced at the NGWWTP, it is randomly disposed in an area of about 10,000 m², which is not technically prepared to receive sludge, located to the west of pond #7; creating environmental pollution and threats the health and safety of the surrounding population.

Under the WMS Project, the World Bank will secure additional financial resources to be deployed by July 1, 2020 for the coming three years. The WMS project is designed to support the PWA to operate the NGWWTP under strict parameters of efficiency and reliability; rehabilitate and operate its associated facilities; and design and put in place an enhanced governance framework aimed at improving the sustainability of wastewater management services in Gaza. The key objectives of the project are to mitigate adverse environmental impacts on communities in the northern governorate by preventing the collapse of the Northern Gaza Wastewater Treatment System; and to improve managerial capacity and financial resilience of wastewater treatment services in the Gaza strip. The implementation of this project will be initiated in March 2020, and the rehabilitation works at the TPS and the NGWWTP sites are expected to be completed within 15 months.

This report presents the Stakeholder Engagement Plan (SEP) for this project. The SEP has been prepared and will be implemented by the project management unit (PMU) at the Palestinian Water Authority (PWA) in Gaza.

1.2. Project Overview

1.2.1. Project Location

The different components of the project are located in two main sites in the Northern governorate in the Gaza Strip, namely the NGWWTP site in Jabalia Municipality and the TPS and BLWWTP site in Beit Lahia Municipality, in addition to the pressure pipeline that connects these two sites, where some rehabilitation works will take place (See Figure 1-1).

1.2.2. Project components

A detailed technical audit has been prepared for the existing NGEST project, which comprises the NGWWTP and TPS, based on the standard asset management methodology as outlined in international standards. The output of this audit includes the condition of every electromechanical and civil assets including ranking the equipment according to levels of deterioration (from unserviceable to new or excellent condition. The results of the performance audit informed the specific investments under the WMSP project components described as follows:

- 1. Component 1: Support the operation of the Northern Gaza (NG) WWTP and associated facilities including rehabilitation and retrofitting. Under this component the Project will finance the PWA's hiring of qualified staff to operate and maintain the NG WWTP to its design capacity, along with the provision of chemical inputs, tools and consumables for operating NGEST facilities for three years (from March 2020 to March 2023). The PA will finance energy costs under agreed standards and protocols. This component will also finance the cost of rehabilitation works of underperforming or environmentally sensitive wastewater pumping and treatment facilities, including: (i) the Terminal Pumping Station (TPS) that has been poorly maintained and is only working on 1 out of 5 pumps; and (ii) a reliable voltage regulation system at the NG WWTP. The scope and priority of rehabilitation needed is currently being assessed through the preparation of a rigorous and independent performance and technical audit.
- 2. Component 2: Limited upgrade of NGEST and TPS facilities to build resiliency and address emergencies. This component will finance: (i) an emergency overflow system for the terminal pumping station; (ii) upgrading of the existing pond #7 that is adjacent to the Terminal Pumping Station to a 24 hours flow capacity. This pond should include special lining in order to prevent raw sewage from seeping into the environment and submerged aerators that can aerate the sewage to prevent odor emissions.
- 3. Component 3: Capacity building for sustainability of wastewater services in northern Gaza. This component will finance: (i) technical assistance to build capacity of the Technical Team for wastewater management within the existing organizational structure, to address the current emergency and for the long term sustainable operation of the plant; and (ii) technical assistance to design and implement an enhanced governance and institutional framework based on the national wastewater strategy for efficient and reliable management of wastewater treatment services in northern Gaza; in close coordination with similar efforts that are being conducted in central and south Gaza. This component will be supported by a series of actions that need to be complied with before the project is effective, namely: (i) a comfort letter that a Utility establishment by-Law will be endorsed and effective by the first year of the project; (ii) a memorandum of understanding (MoU) between PWA and CMWU outlining roadmap for handing over O&M of NGEST to CMWU; (iii) development of a ToR for an independent consultant to undertake a rapid assessment to examine WWS in North Gaza and produce time-bound actions to achieve sustainability of the sector in North Gaza in accordance to the on-going national reforms at the three levels; (iv) a proposed organizational structure to operate TPS and WWTP as one scheme; and (v) Service Agreements between CMWU and Municipalities (to be included in the MoU).
- 4. **Component 4: Project management and implementation support.** It would finance: (i) PWA's Project supervision and Project management; and (ii) consulting services for the development of engineering designs and preparation of safeguard instruments.

1.2.3. Beneficiaries

The project is designed to directly serve the four municipalities in the northern governorate of the Gaza Strip with a total population of about 400,000 persons (of whom 49% are females and 51% are males). However, the capacity building components will benefit the entire population of the Gaza Strip.

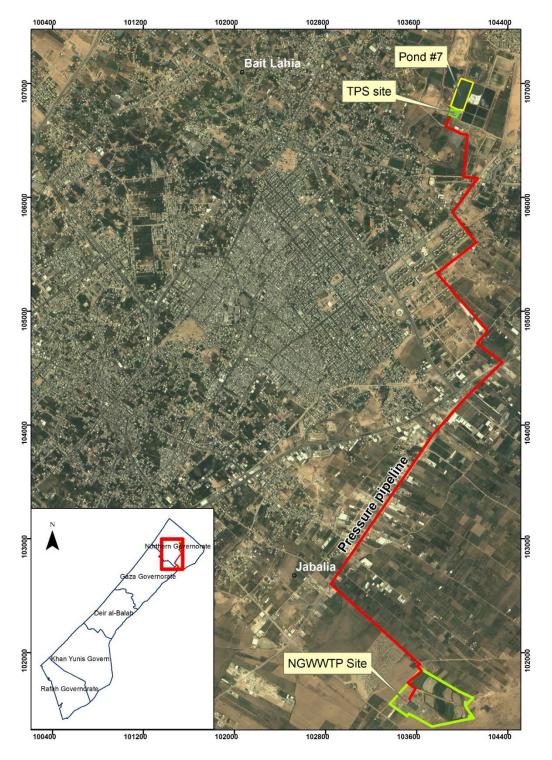


Figure 1-1: Project Location

1.2.4. Potential social and environmental risks and impacts of the project

While there are substantial anticipated overall improvements for the surrounding communities and the environment from the proposed project, some negative impacts are anticipated. The main potential impacts that could arise from the different phases of the Project were identified in the ESMP report prepared for the Project and their significance was assessed so that any potentially significant impacts can be properly mitigated and monitored. There are some environmental risks/impacts related to this project, however, these impacts are not of high significance. None of the risks/impacts are long term, irreversible, cumulative with other existing or foreseen impacts or could impact a sensitive environment. However overall environmental risks that includes the community risk is rated substantial due to legacy of previous incidents around the TPS before the big lake was drained through the NGEST project. Moreover, there are contextual environmental risks due to the possibility of disruption in the operation and maintenance of the plant as a result of budget shortfall, conflict, electricity shortages, etc.

The main environmental risk may include:

- Occupational health and safety (OHS) risks during construction, rehabilitation, and maintenance of chambers along the pressure line, activities in pond #7 and construction of overflow pipe to pond #7, as well as installation and electrical works at the TPS and the NGWWTP (Component 2). On the other hand, OHS risks during operation are mainly the risk on technicians/operators health due to contact with raw or partially treated wastewater as well as safety risk during the operation of different facilities and the health risk due to suffocation or poisoning to presence of hydrogen sulfide (H2S); methane (CH4), and carbon dioxide (CO2). The occurrence of OHS incidents has low probability (possible but not likely) and could be minimized through abiding to tailored OHS plans for each activity
- risks associated with handling wastes, such as construction waste materials and packaging materials from rehabilitation activities in pond #7 and the construction of the overflow pipe to pond #7 (Component 2), soil from excavation of the overflow pipe and sludge from pond #7, and wasted sludge and screening materials during operation of the NG WWTP (component 1);
- Other environmental risks including noise, dust and waste handling during construction and operation (Components 2) are mainly of low significance due to their small scale, localized nature and the fact that the activities will take place within the footprint of the NGWWTP site.

The main social risk may include:

• Risk of overflow and flooding of the wastewater from the existing northern lagoons (lakes) and pond #7 at the time of stoppage or malfunctioning of the plant or the TPS due to unforeseen circumstances such as excessive flooding, cut off electricity, conflict, etc. The overflow and the poorly maintained embankment of these lagoons and pound #7 will have a flooding risk to the surrounding communities especially in the downstream of the lagoons.

- Poor safety measures such as proper fencing around these facilities and missing of warning signs around the sites can be a health hazard to the community, especially children.
- Risk of getting equal job opportunities for women in the project as a result of the stereotype of women's work in the construction activities;
- Poor opportunities for vulnerable groups to participate in the various stages of the project;
- Weak community interaction with the project, due to the lack of trust and confidence between the community and municipalities related to the ability of the municipalities in accomplishing and operating the project components;
- Expected conflicts between municipalities and their ownership of the project or their contributions that may adversely affect the implementation of the project; and
- Community health impact due to excessive movement of vehicles during transferring
 of solid waste, construction debris, and sludge, as well as exposure of children to
 uncontrolled sludge dumping sites near the existing ponds and facilities, which also
 create breeding grounds for mosquitos and flies.

1.3. Purpose and objectives of SEP

The purpose of the present Stakeholder Engagement Plan is to explain how Stakeholder Engagement will be practised throughout the course of the project life cycle and which methods will be used as part of the process; as well as to outline the responsibilities of PWA/PMU and contractors in the implementation of Stakeholder Engagement activities.

1.4. Regulations and Requirements

1.4.1. World Bank Environmental and Social Standard 10

The Environmental and Social Framework (ESF) that was launched on October 1, 2018 forms a new set of environment and social policies to enable the World Bank and Borrowers to better manage environmental and social risks of projects and to improve development outcomes. An essential part of this framework is the ten Environmental and Social Standards (ESSs), which establish the standards that the PWA and the project should meet through the project life cycle. Out of these standards, ESS 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

- The process of stakeholder engagement will involve the following, as set out in further
 detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the
 engagement with stakeholders will take place; (iii) disclosure of information; (iv)
 consultation with stakeholders; (v) addressing and responding to grievances; and (vi)
 reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed, as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP. According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

1.4.2. Palestinian Environmental Assessment Policy

The Palestinian legislation requires public consultation only for projects that require Environmental Assessment. The Palestinian Environmental Assessment Policy (PEAP) was approved by decree No: 27- 23/4/2000.

One of the main principles underlying this policy is that stakeholder consultation is an essential component of it. Article 8 of this policy on Stakeholder Consultation states the following:

- 1. Proponents are required to consult stakeholders during the scoping and conduct of Environmental Impact Assessments.
- 2. Stakeholder consultation may be required during Initial Environmental Evaluation (IEE) as determined by the Environment Quality Authority (EQA).
- 3. The EQA is empowered to conduct its own stakeholder consultation to verify the information provided, or extend the proponent's consultations.
- 4. Initial Environmental Evaluation and Environmental Impact Assessment Reports shall be made available by proponents for stakeholder review and comment as specified by the EQA.
- 5. The EQA shall coordinate EA consultations with consultations by other authorities pursuant to other regulations and laws.

According to the policy, stakeholder consultation is optional when undertaking an IEE. In consultation with the proponent and the EA Committee as required, the EQA determines whether stakeholder consultation is required and, if so, what the minimum requirements should be. It may be required during scoping and terms-of-reference preparation, and during the conduct of the IEE.

However, stakeholder consultation is mandatory when undertaking an EIA. In consultation with the implementing agency, in this case PWA and the Enviornemntal Assessment (EA) Committee, the EQA determines what the minimum requirements for stakeholder consultation should be. It may be required during scoping and terms-of-reference preparation, and during the conduct of the EIA. At minimum, the implementing agency must meet with the principal stakeholders to inform them about the proposed project and to solicit their views about it. Projects that are more problematic should involve consultations that are more extensive. The methods and results of these consultations must be documented in the EIA Report. In accordance with this policy, an Initial Environmental Examination (IEE) study is required for this project, given that its environmental impacts are uncertain. Consultations, however, are optional for such study.

2. Brief Summary of Previous Stakeholder Engagement Activities

PWA has been engaging with various project stakeholders since the end of 2017, as part of the preparation of the BLWWTP decommissioning plan, of which some items are considered under the components of this project. Moreover, number of stakeholder engagement activities have taken place during the preparation of this SEP. The activities have targeted the key stakeholders who need to be involved in the project and the engagement plan preparation; these activities include the following:

- Public consultation meeting with the local communities found to be directly affected by the project (December 3rd, 2019); and
- Informal meetings with municipalities and governmental agencies (November 25-28, 2019).

2.1. Consultations during the preparation of the BLWWTP decommissioning plan

The stakeholder engagement activities that took place as part of the preparation of the BLWWTP decommissioning plan included preliminary meetings with different stakeholders during the screening phase, a scoping meeting, group meetings with different municipalities during data collection phase, and two public consultation workshops during the preparation of the Environmental and Social Aspect report for the decommissioning plan. The activities are summarized in Table 2-1, while more details about each activity can be found in the Environmental & Social Aspect Report for the Remediation Alternatives for the Beit Lahia Wastewater Treatment Plant (BLWWTP) (EcoConServ and UG, 2018).

Table 2-1: Summary of stakeholder engagement activities for the decommissioning plan

Activity	Target stakeholders	Date
Individual	Ministry of Awqaf	December 10
Meetings		and 24, 2017
	Beit Hanoun Municipality	December 20,
		2017
	Beit Lahia Municipality	December 20,
		2017
	Um Al Naser Municipality	December 20,
		2017
	Palestinian Land Authority	December 24,
		2017

Activity	Target stakeholders	Date
Scoping meeting	Municipalities, academics, CBOs, Ministries, and	January 22,
	media.	2018
Group meetings	Um Al Naser municipality and the strategic	January 2018
	planning committee.	
	CBO of Um Al Naser	January 2018
	Beit Lahia Municipality	January 2018
Public	Local communities, municipalities and	March 15, 2018
consultation	representatives of different governmental and	
workshops	nongovernmental organizations.	
	Local communities, municipalities and	April 25, 2018
	representatives of different governmental and	
	nongovernmental organizations.	

2.2. Consultations for SEP preparation

2.2.1. Public consultation meeting

As part of stakeholders' engagement in the preparation of the WSM project, a public consultation meeting was conducted on December 3, 2019 at Bait Lahia Municipality. The meeting was conducted to explain about the new activities and their role in improving the life conditions of the neighboring local communities, who are currently exposed to odor and flies nuisance as well as health and safety risks associated with the dumping of sludge and the discharge of wastewater into unsecured ponds that do not have any safety measures. About 80 people attended the meeting, with representatives from the four municipalities in the northern governorate (Beit Lahia, Beit Hanoun, Jablia, and Um Al Naser), local communities, CBOs, universities, farmers, and PWA staff (See Annex I for the list of participants).

At the beginning of the meeting, Eng. Mazen Abu Samra-NGEST site manager provided a brief description of the project objectives and main activities. This presentation was followed by a summary of the anticipated environmental and social risks and impacts. Later, the participants were introduced to the stakeholder engagement plan and informed about the grievance redress mechanism that will be in place during different phases of the project. The Agenda of the workshop is provided in Annex II.

The last part of the meeting was dedicated for the discussion of the participants concerns or expectations/hopes associated with the Project. All of the participants insisted the need for urging the implementation of the project as well as securing its sustainable operation. All concerns, comments and recommendations raised by the participants during the discussions as well as the PWA response to these concerns are illustrated in Table 2-2. Photos during the meeting can be found in Annex III. These concerns will be considered and addressed in the ESMP that is being prepared for this project.

2.2.2. Individual meetings

The four municipalities in the northern governorate were approached through individual meetings on November 25 and 27. During these meetings, the municipalities were introduced to the details of the upcoming project and the preferred mechanisms for communication and

coordination were identified, in addition, their concerns and interests regarding the project activities and the GRM were discussed. Moreover, some governmental institutions were also approached through individual meetings, namely the environment quality authority (EQA), the Ministry of Health (MoH), and the Ministry of Agriculture (MoA), in order to ensure compliance with the national strategies and plans and identify requirements. Table 2-3 summarizes the targeted institution, date and persons met during these meetings, as well as the key issues that were raised as part of the discussions (Annex IV: Photos during meetings).

Table 2-2: Key issues raised during the public consultation meeting

Category	Comments/concerns	Response
	Dr. Asaad Abdeldayem-Former council member at Beit Lahia	Eng. Mazen Abu Samra
	Municipality.	The project will study whether to use the treated sludge for
	The current situation at BLWWTP is unaffordable; the problem	agricultural purposes or dispose it to authorized landfill.
	of the wastewater that is being discharged to the site is	
	compounded by the accumulation of the NGWWTP sludge	The starting date for this project is March/April, 2020. The
	around the site, as well as the illegal dumping of solid waste. An	rehabilitation works at the TPS and the NGWWTP sites are expected
	integrated remediation plan should be in place to solve the	to be completed within 15 months. Further, the operation costs are
	problem.	financed by the World Bank for the first three years. The project will
	The timeframe for different project phases should be clear.	also study the sustainable operation of the project after these three
	How more long would take this problem to be solved?	years.
Mu	Walid Abu Firya-Health and Environment Department at Um Al Naser	Eng. Mazen Abu Samra
Municipalities	Municipality	The rehabilitation and upgrading works under this project are
pali	The random ponds to the north of Um Al Naser village form a	designed to help in addressing all issues regarding the wastewater
ities	health and safety risk to the surrounding communities' children	management in the northern governorate. This issue will be solved
0 ,	and farmers. Pumping wastewater to these ponds should be	when the TPS and NGWWTP work properly.
	stopped.	
	Council member at Beit Lahia Municipality.	The WMS project will provide technical and financial resources to
	Cannot we consider the properly treated wastewater and	continue the operation of the NGWMF at its design capacity, while
	sludge as a source of income, and manage them in a manner	building a long-term technical, institutional and financial capacity to
	that help in covering part of the operating costs?	operate and maintain wastewater services in North Gaza. For long
	The annual operation cost of the project is about two million	term sustainability, the Project is to gradually build the capacity of the
	dollars. After the first three of operation, municipalities will be	Coastal Municipal Water Utility (CMWU) to work as a regional utility.
	responsible for 20% of this cost as the CMWU will be	The knowledge and capacity to manage ESF should be transferred to
	responsible for the remaining percentage, later, municipalities	them as part of component 3.

Category	Comments/concerns	Response
	might be responsible for covering the whole cost; how could	PWA will adopt and implement measures and actions to assess and
	this be achieved under the deteriorated economic conditions?	manage sludge handling and disposal plan as required in the ESMP
	 The current wastewater tariff at the municipalities is very low; 	and Environmental and Social Audit (ESA).
	therefore, increasing this tariff in the future should be	
	associated with the improvement of municipalities' technical	
	and financial conditions.	
	Municipalities should be involved in the operation and	
	management of the new wastewater system.	
	Each municipality in the northern governorate should have its	
İ	own emergency wastewater pond. Beit Lahia should not be	
	responsible for the management of wastewater from other	
	municipalities.	
	Local Community-Jabalia	Eng. Mazen Abu Samra
	The continuous operation of the project should be ensured,	.PWA will adopt and implement measures and actions to assess and
	thus, energy for operation should be secured.	manage sludge handling and disposal plan as required in the ESMP
_	Would the reuse of the sludge be considered as part of the	and Environmental and Social Audit (ESA).
Local Community	project? If not, what are the options for disposal?	
Co	Ata Saadat-Local community (Al Awda residential complex)	The implementation and operation of the project are to ensure the
3 3	We wish that the continuous and sustainable operation of the	proper operation of the NGWWTP, the TPS, and the associated
<u> </u>	NGWWTP and the TPS would be assured. The conditions in the	facilities. PWA will be responsible for the operation of the project for
₹	area were noticeably enhanced during the period between	the first three years, which will be financed by the World Bank. The
	March 2018 and July 2019, when the facilities were working	project will also study the sustainable operation of the project after
	properly. However, the current conditions are worse than they	these three years.
	have ever been.	

Category	Comments/concerns	Response		
	Ahmed Qandeel-Representative of the Local Council for Al Awda	Eng. Mazen Abu Samra		
	residential complex	According to the project ESMP, specific mitigation measures will be		
	 Women and children in the area suffer from health implications 	considered to address these issues. These measures include but are		
	that are associated with the bad conditions at the BLWWTP site,	not limited to:		
	including pulmonary and skin diseases.	The use of signs, barriers, and education/public outreach to		
	 MoH and different health centers and clinics in the northern 	prevent public contact with potentially dangerous materials.		
	governorate should be involved.	Taking appropriate measures to prevent unauthorized		
	Safety of children should be the main concern of the project.	persons from entering the ponds areas and the construction sites, particularly children. Provide guards when and where it		
		is found necessary to provide adequate security and safety of		
		the public.		
		Maintaining and considering safe and careful movement of		
		sludge hauling vehicles.		
		MoH has already been approached and will be approached whenever		
		it deemed necessary.		
	Ayesh Barhoum- Local community (Beit Lahia)	Eng. Mazen Abu Samra		
	The existing ponds in BLWWTP site cannot accommodate the	Pond #7 will be rehabilitated to be used as an emergency reservoir		
	amounts of wastewater during wars and instable political	and will be provided with a pumping station to return the collected		
	conditions; i.e. the ponds have reached their full capacities in	wastewater to the TPS.		
	less than one week in the previous war, where the operating			
	staff was unable to reach the site.			
	Mohammed Abu Ajeen- Local community (Um Al Naser municipality)	Eng. Mazen Abu Samra		
	 The random ponds to the north of Um Al Naser village pose a 	The rehabilitation and upgrading works under this project are		
	serious health threat to the local residents, where many skin	designed to help in addressing the issue regarding the current		
		situation at the random lake.		

Category	Comments/concerns	Response
	diseases incidents were recorded among women and children	
	in the area (more than 15 cases have been reported recently).	
	Hamed Al Radee'- Local community (Beit Lahia)	Eng. Mazen Abu Samra
	Given that only one out of five pumps at the TPS is currently	The pumps are currently under maintenance works funded by (ICRC)
	being operated, then the repair/replacement of pumps at the	
	TPS is very urgent. Will this pump be able to keep working	
	properly until the next year, when the fund is available and the	
	rehabilitation works are implemented?	
	Iftikhar Al Shaikh-Health educator (Beit Lahia)	Eng. Mazen Abu Samra
	The ponds at BLWWTP site should be dried up completely and	no wastewater will be discharged to these ponds; only pond #7 will
He	the sludge should be removed along with the solid waste that	be used for emergencies after rehabilitation. Moreover, a sludge
Health	are being illegally dumped in the site.	management plan for the NGWWTP will be prepared to ensure the
Sector	Different pulmonary and skin diseases incidents have been	safe handling and disposal of the generated sludge in an
tor	recorded in the area as a result of the deteriorated health and	environmentally accepted manner. The plan should include
-	environmental conditions.	agreement between PWA and Municipality of Gaza for the disposal
		of the sludge of NGWWTP to Johr El Deek landfill.

Table 2-3: Summary of the meetings with the municipalities.

Institution Persons Date Main issues raised		Date	Main issues raised	
	Beit Lahia Dr. Tamer November			- The TPS receives about 40,000 m ³ /day, while the NGWWTP capacity is only 36,000 m ³ /day, therefore,
		Slaibi	25, 2019	there must be an overflow of the wastewater to the sea.
		Dr. Jabr Al		- The TPS should be equipped with a sand trap to reduce the sand accumulation that affects the pumps.
		Kaseeh		- All of the five pumps at the TPS should be replaced.
				- The pressurized pipeline should be equipped with instrumentations that allow for the monitoring of
				the pressure in the line, and therefore indicate the presence of any cracks.
				- The sludge transferred from the NGWWTP to the BLWWTP site should be transferred to the landfill,
				and possible options for the reuse of future amounts should be studied.
				- Unfavorable odor, mosquitos and flies are the main concerns of people in the area surrounding
				BLWWTP site, along with the safety issues regarding the wastewater in the ponds.
7				- The GRM for this project could be linked to the municipality complaints system, where the complaint
Municipalities				is received at the municipality and redirected to the PWA/PMU.
icip	Jabalia	Eng. Hamdi	November	- The pressurized pipeline should be equipped with instrumentations that allow for the monitoring of
aliti		Mtair	25, 2019	the pressure in the line, and therefore indicate the presence of any cracks.
es				- Check valves should also be added to the line, especially where the pipeline direction is changed.
				- The GRM for this project could be linked to the municipality complaints system, where the complaint
				is received at the municipality and redirected to the PWA/PMU.
	Beit	Eng.	November	-Sustainable operation of the NGWWTP along with the decommissioning of the old BLWWTP is crucial.
	Hanoun	Muhanad Al	27, 2019	- Residents in the northwestern area of Beit Hanoun municipality; ; Al Nada and Al Awda residential
		Qano'		areas, are highly affected by the current practices at BLWWTP site (this include nuisance, and health
		Eng. Shadi Al		and safety impacts).
		Basyoni		- Maintenance of the municipal wastewater facilities should be included as part of the project, to ensure
				its sustainability.
	Um Al	Eng. Subhi	November	- The sludge transferred from the NGWWTP to the BLWWTP site should be transferred to the landfill.
	Naser	Naser	25, 2019	

Institution Persons Date Main issues raised		Main issues raised		
		Eng. Ahmed		- Maintenance of the municipal wastewater pumps should be included as part of the project, to ensure
		Fayyad		its sustainability.
				- There is a leakage from the western boundary of Pond #7; the rehabilitation of this pond should
				consider this issue.
	EQA	Dr. Khalid	November	- The sludge accumulated near BLWWTP should be transferred to the landfill or to a land rented for this
		Qahman	27, 2019	purpose near the NGWWTP site.
				- Reconfiguration of the sewage pumping schemes in the northern governorate should be considered.
				- The removal of solid waste accumulated near the BLWWTP should be considered.
				- A clear monitoring plan should be prepared.
				- An overflow line to the sea should be studied, as it could be the most suitable option during
G				emergencies; the line could be placed 100 m offshore to avoid/mitigate the associated environmental
Governmental Agencies				impacts.
rnn		Eng. Bahaa Al	November	- The area surrounding the BLWWTP site suffers deeply from the unfavorable odor, flies and mosquitos
nen:		Agha	28, 2019	resulted from the accumulation of untreated wastewater and sludge at the site. The plant should be
tal /				permanently closed; other measures should be considered for emergency cases other than pumping
Age				the wastewater to this site.
ncie				- Working on the second phase of the NGWWTP is urgent, i.e. the current amounts of wastewater
SS				received at the TPS exceed the current capacity of the plant.
- Overflow to the sea should be considered for emergency.		- Overflow to the sea should be considered for emergency.		
				- Upgrading the biogas system at the NGWWTP would help in addressing many problems.
	МоН	Dr. Khalid Al	November	- Sludge treatment should be considered to avoid environmental and health adverse impacts and
		Tibi	28, 2019	feasibility study for sludge reuse options should be conducted.
				- Safety measures should be implemented during all construction works especially at Pond #7 to ensure
the occupational safety of workers and prevent any health implications.		the occupational safety of workers and prevent any health implications.		

Institution	Institution Persons Date		Main issues raised
			- Given that Pond #7 will be used for emergency, the use of the area for recreational purposes is
	unhealthy and unsafe.		unhealthy and unsafe.
MoA Dr. Thaer November		November	- MoA and the farmers are the final users of the project; therefore, the ministry is supporting any
	Abu Shbak 27, 2019		progress towards the achievement of the required quality and quantity that allow for the recovery
			scheme to be efficiently and safely operated.
			- Sludge treatment and reuse should also be considered.

3. Stakeholder identification and analysis

For the purpose of the SEP, the term "**Project-affected parties**" includes "those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities". They are the individuals or households most likely to observe changes from environmental and social impacts of the project.

The term "Other interested parties" (OIPs) refers to "individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest.

3.1. Project-affected Parties (PAPs)

Within the scope of this project, there are three main categories for the project-affected parties, namely the local communities residing in the project areas, the farmers who will benefit from the project indirectly and the municipalities in the northern governorate of the Gaza Strip.

3.1.1. Local communities residing in the project areas

This category of PAPs includes the people identified based on their geographical location in the vicinity of the project sites (See Figure 3-1), and the local communities in the northern municipalities who will benefit from the improved sanitation services.

3.1.2. The farmers in Jabalia and Beit Hanoun Municipalities

This category of PAPs includes the farmers who will benefit from the improvement of the treated wastewater quality after the implementation of the recovery scheme (See Figure 3-2). The farmers will use the recovered water to irrigate their farms as a recovery wells scheme is planned to recover the infiltrated treated wastewater for irrigation.

3.1.3. Municipalities in the northern governorate

The northern governorate in the Gaza Strip comprises four municipalities, namely municipality of Beit Lahia, municipality of Jabalia, municipality of Beit Hanoun, and municipality of Um Al Naser. These municipalities are identified as project-affected parties given that they are the key beneficiaries of the project, where the wastewater infrastructure will be improved along with the wastewater treatment, disposal and/or reuse. However, Beit Lahia and Jabalia municipalities will be concerned more as the project components are located within their governance.



Figure 3-1: Local communities around TPS and Lagoon #7 site



Figure 3-2: Area to be irrigated through the recovery network in the future

3.2. Other interested parties (OIPs)

Table 3-1 below summarizes the key categories of OIPs and the respective justification for their interest in the project. Along with these external OIPs, there are number of internal interested parties with stakes in the project including PWA staff; supervision consultants; contractors; sub-contractors and their workers.

Table 3-1: Other interested parties

Category	Institution	Interest
Ministries and	EQA	Engage with the public and approve and disclose
Government		the ESMP Report and Environmental Decision
agencies	МоН	Impacts on public health due to the current and
		the proposed wastewater treatment and disposal
		practices
	MoA	Anticipated impacts of the project on the quality
		of the treated wastewater and the resulted sludge,
		including the possible options for reuse
	Ministry of	The land of old BLWWTP is a Waqf land
	Awqaf	
	MoLG	Land acquisition arrangements between PWA and
		Ministry of Awqaf.
	GEDCo	Arrangements regarding the voltage regulation
		system.
Non-	WASH Cluster,	Emergency and humanitarian interventions
governmental and	Oxfam, and	regarding sanitation services in the north
civil society	CBOs	governorate;
organizations		May have in-depth knowledge about the
		environmental and social characteristics of the
		project area and the nearby populations, and can
		play a role in identifying risks, potential impacts,
		and opportunities to be addressed in the
		assessment process;
		Public consultation activities.
Academic	Universities,	Potential concerns regarding environmental and
institutions	and academic	social impacts;
	experts	Potential educational/outreach opportunities to
		increase awareness and acceptance of the project.
Press and media	TV and radio,	Inform residents in the project area and the wider
	social media	public about the Project implementation and
	platforms	planned activities.

3.3. Vulnerable individuals or groups

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. It will be important for the Project to ensure specific steps are taken to access these groups and afford them the opportunity to engage in discussion about the Project and their interactions with it. The main vulnerable groups identified for this project are summarized in Table 3-2.

Table 3-2: Vulnerable groups

Table 3-2: Vulnerable Vulnerable Group	
•	Description and Relationship to the Project Woman and famala hazded households, widows and diversess
Women, Female-	Women and female-headed households, widows and divorcees
headed households, and female farmers	tend not to have the same access to public consultation sessions
and remaie farmers	(details in section 4.3). It is not customary for women in some
	localities in the Gaza Strip to participate in public meetings;
	therefore they do not usually have the opportunities to reflect
	their concerns regarding the implemented projects, although they
	might be affected more than men. For instance, the stoppage or the malfunctioning of the project facilities may result in a flooding
	, , , , , , , , , , , , , , , , , , , ,
	risk to the surrounding communities; woman and their children
	are particularly susceptible to the immediate effect of microbiological contaminants associated with flooding. Moreover,
	flooding incidents will increase women households' burdens and
	thus may affect their reproductive role, which in some cases may
	lead to domestic violence and psychological impact
	On the other hand, the overall impact of the operation of the
	project on this group is positive, as their households hygiene and
	health will be improved
	nealth will be improved
	Moreover, the flooding of wastewater to surrounding area will
	affect the farms' productivity and farmers' livelihood as a result.
	Therefore, farmers are expected to be more secured as a result of
	the project given that it will limit the risk of their farms to be
	flooded with wastewater and will also limit the presence of
	rodents that may affect their crops. In addition, it will enhance the
	health and safety of the women working in farms as well as the
	health and safety of the women working in family as well as the
People with	People with disabilities are likely to be particularly vulnerable
disabilities	members of the community, as they tend to need more support
disabilities	and often rely on family care. They are also likely to have reduced
	opportunities for participation in public engagement (or other
	public activities) and potentially less access to information.
	The project will have positive impacts on these groups, as it will
	minimize the flooding risk, which may affect them significantly if
	their houses are in the flood downstream. Therefore, the project
	will improve their living conditions, and this SEP will ensure their
	participation in engagement activities.
Children and Elderly	Children as well as elderly (men and women) are likely to have a
(men and women)	more limited ability to participate in public engagement (or other
	public activities) and potentially less access to information. These
	groups usually tend to need more support and often rely on family
	care.
	The project is expected to have positive impact on these people,
	as it will improve their living conditions and minimize the health
	and safety risks, which could affect them more. The health risks
	include especially the skin and respiratory diseases, while the
	safety risks are mainly associated with unsecured wastewater and
	sludge ponds, including the recently dried ones, where children
	are found to be particularly susceptible to the risk of drowning in
	these ponds.
	are found to be particularly susceptible to the risk of drowning in

3.4. Summary of stakeholder Needs

Table 3-3 summarizes the needs of different stakeholder groups identified for this project under sections 3.1, 3.2 and 3.3.

Table 3-3: Summary of project stakeholder needs

	Stakeholder group	Key characteristics	Language needs	Preferred notification means	Specific needs
PAPs	Local communities residing in the project areas	Residents including women headed household, elderly and people with disabilities and farmers (males and females) live in the vicinity of the project sites	NA	Leaflets, mosques, Neighborhood Committees and through the municipalities	Daytime meetings, venues are easily reachable and do not require long commute,
	Municipalities in the northern governorate	Beit Lahia, Jabalia, Um Al Naser, and Beit Hanoun	NA	Official invitation letters (e-mail, phone)	Daytime meetings
	Ministries and Government agencies	Five ministries (EQA, MoH, MoA, Ministry of Awqaf and MoLG) with different interests in the project	NA	Official invitation letters (e-mail, phone)	Daytime meetings
OIPs	Non- governmental and civil society organizations Some local, national and international organizations that have in-depth knowledge about the characteristics of the project area and the nearby populations		NA	Official invitation letters (e-mail, phone)	Daytime meetings
	Academic institutions	Number of local universities and academic experts with potential educational/outreach opportunities to increase awareness and acceptance of the project	NA	Official invitation letters (e-mail, phone)	Daytime meetings

Stakeholder group	Key characteristics	Language needs	Preferred notification means	Specific needs
Press and media	Local media tools and platforms, through which information regarding the project activities will be presented and that have outreach opportunities to increase awareness and acceptance of the project	NA	Official invitation letters (e-mail)	-

4. Stakeholder Engagement Program

4.1. Planned stakeholder engagement activities

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The table below presents the stakeholder engagement activities envisaged under the project. The activity types and their frequency are adapted to the three main project stages (project design and preparation; construction and operation and maintenance phase). A more detailed explanation of the stakeholder engagement methods used is included in section 4.2.

Table 4-1: Planned stakeholder engagement activities per project phase

Project	Target stakeholders	Topic(s) of	Method(s) used	Location/frequency	Responsibilities
stage		engagement			
Design and preparation	Project Affected Parties: People in the vicinity of the project sites; Local communities in the northern municipalities; Farmers; Vulnerable households	Project scope and rationale; Project E&S principles; Grievance mechanism process	- Public meetings, separate meetings specifically for women and vulnerable; - Mass/Social Media Communication – TV, radio, Facebook; - Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities; - Grievance mechanism - Survey on selected & representative sample.	- Project launch meetings in municipalities; - Communication through mass/social media (as needed); - Survey in the affected area Information desks with brochures/posters in affected municipalities (continuous)	- PMU; - Municipalities.
	Project Affected Parties: Municipalities representatives	Project scope and rationale; Project E&S principles; Grievance mechanism process	- Individual meetings - Joint public/community meetings with PAPs	As needed	- PMU;
	Other Interested Parties (External): National Government Ministries; Academic institutions;	Project scope and rationale; Project E&S principles;	- Individual meetings - Joint public/community meetings with PAPs	As needed	- PMU;
	Other Interested Parties (External): Press and media; NGOs;	Project scope and rationale;	 Individual meetings; focus groups meetings; Disclosure of written information - Brochures, 	 Project launch meetings in municipalities; Communication through	- PMU;

Project	Target stakeholders	Topic(s) of	Method(s) used	Location/frequency	Responsibilities
stage		engagement			
	CBOs;	Project E&S principles; with focus on water issues and impacts of the projects in targeted areas; Grievance mechanism process	posters, flyers, website Information desks - In Municipalities; - Grievance mechanism - Project tours for media/social media activists and influencers.	mass/social media (as needed); - Information desks with brochures/posters in affected municipalities (continuous)	
	Other Interested Parties: (Internal) Other PWA Staff; Supervision Consultants; Contractor, sub-contractors and their workers	Project information - scope, rationale and E&S Principles; E&S sub-plans; Grievance mechanism process	 Meetings; Workshops; Training on grievance mechanism for designated team members with general orientation for others. Invitations to public meetings 	As needed	- PMU; - Contractor/sub- contractors;
Construction	Project Affected Parties: People in the vicinity of the project sites; Local communities in the northern municipalities; Farmers; Vulnerable households	Project health and safety impacts and mitigation measures; Employment opportunities; Environmental concerns; Grievance mechanism process.	- Public meetings, separate meetings specifically for women and vulnerable; - Mass/Social Media Communication – TV, radio, Facebook; - Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities; - Grievance mechanism	- Meetings in all affected municipalities with ongoing construction (as needed); -Communication through mass/social media (as needed); - Information desks with brochures/posters in affected municipalities (continuous)	- Social Officer (SO); - Public relations at PWA Contractor/sub- contractors;
	Project Affected Parties:	Project scope and rationale;	- Individual meetings	As needed	- SO;

Project	Target stakeholders	Topic(s) of	Method(s) used	Location/frequency	Responsibilities
stage		engagement			
	Municipalities representatives	Project E&S principles; GRM.	- Joint public/community meetings with PAPs		
	Other Interested Parties (External): National Government Ministries; Academic institutions;	Project scope and rationale; Project E&S principles; Employment opportunities; Environmental concerns;	- Individual meetings - Joint public/community meetings with PAPs	As needed	- SO;
	Other Interested Parties (External): Press and media; NGOs; CBOs;	Health and safety Impacts; Project E&S principles; Employment opportunities; Environmental concerns; Grievance mechanism process	- Individual meetings; focus groups meetings; - Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities; - Grievance mechanism - Project tours for media, local representatives, social media activists and influencers.	- Communication through mass/social media (as needed); - Information desks with brochures/posters in affected municipalities (continuous)	- SO; - Public relations at PWA.
	Other Interested Parties: (Internal) Other PWA Staff; Supervision Consultants; Contractor, sub-contractors and their workers	Project information - scope, rationale and E&S Principles; E&S sub-plans; Grievance mechanism process.	Meetings;Workshops;Invitations to public meetings	As needed	-PWA staff - SO; - Contractor/sub-contractors;
Opera tion	Project Affected Parties: People in the vicinity of the project sites;	Satisfaction with engagement activities and GRM;	- Training on grievance mechanism for designated	- Meetings in all affected municipalities (one per year);	- SO; - Public relations at PWA.

Project	Target stakeholders	Topic(s) of	Method(s) used	Location/frequency	Responsibilities
stage		engagement			
	Local communities in the northern municipalities; Farmers; Vulnerable households	Grievance mechanism process; Community health and safety measures during operation; Emergencies.	team members with general orientation for others. - Public meetings, separate meetings specifically for women and vulnerable; - Mass/Social Media Communication – TV, radio, Facebook; - Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities; - Grievance mechanism - post survey for a selected representative sample in the area.	-Communication through mass/social media (as needed); - Information desks with brochures/posters in affected municipalities (continuous) - Survey (suggested to be conducted after six months or so from the stability of the operation and services).	
	Project Affected Parties: Municipalities	Community health and safety measures during	Individual meetingsJoint public/community	Monthly (as needed)	- SO; - Public relations at
	representatives	operation; Environmental concerns; Emergencies.	meetings with PAPs		PWA.
	Other Interested Parties (External): National Government Ministries; Academic institutions; NGOs	Project scope and rationale; Project E&S principles; Employment opportunities; Environmental concerns;	 Public and individual meetings; Disclosure of written information - Brochures, posters, flyers, website 	Meetings in affected municipalities (one per year); Communication through mass/social media (as needed); Information desks with	- SO; - Public relations at PWA.

Project	Target stakeholders	Topic(s) of	Method(s) used	Location/frequency	Responsibilities
stage		engagement			
		Emergencies.	Information desks - In Municipalities;	brochures/posters in affected municipalities (continuous)	
			- Grievance mechanism - Project tours for media, local representatives, and social		
			media activists and influencers.		

4.2. Engagement methods to be used

The project intends to utilize various methods of engagement that will be used as part of its continuous interaction with the stakeholders. The format of every consultation activity should meet general requirements on accessibility, i.e. should be held at venues that are easily reachable and do not require long commute, entrance fee or preliminary access authorization. The activity should also meet cultural appropriateness (i.e. with due respect to the local customs and norms), and inclusiveness, i.e. engaging all segments of the local society, including disabled persons, the elderly, and other vulnerable individuals .

Those engagement methods shall include small size meetings at the targeted municipalities and announcements through the mosques at those municipalities. The mosque is usually considered an efficient tool of information at small localities; it can be used to inform the community and to encourage active participation of the different stakeholders. If a large audience is expected to attend a public meeting, necessary arrangements will be made to ensure audibility and visibility of the presentation involved. This includes provision of a projector, places allocated for the wheelchair users, etc. Taking records of the meeting is essential both for the purposes of transparency and accuracy of capturing public comments. At least two ways of recording may be used, including:

- taking written minutes of the meeting;
- photography.

A summary description of the engagement methods and techniques that will be applied by PMU-PWA is provided in Table 4-2. The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.

Table 4-2: Engagement Methods and Tools

Method / Tool	Description and Use	Contents	Target Groups
Correspondences (Phone, Emails, official letters)	-To distribute information to Government officials, NGOs, and CBOs	Introduction of the project and information about time and venue of meetings	Government officials, NGOs, CBOs, and universities
	-To invite stakeholders to meetings and follow-up.		
Individual meetings	- To discuss specific project activities and related issues	Project's specific activities and plans, design solutions and impact mitigation/management measures that require indepth discussion with stakeholders.	Municipalities, National government ministries, NGOs, universities
Focus groups meetings	- To be used to facilitate discussion with specific vulnerable groups	- Information on project activities; health and	Elderly, women, and other vulnerable groups.

Method / Tool	Description and Use	Contents	Target Groups
	- Presentation and an interactive Questions & Answers session with the participants	safety Impacts; Project E&S principles; - GRM guidebook/manual	
Public meetings	- Project launch meetings and community public meetings throughout the project life cycleTo present project information affected parties and larger communities -To allow participants to provide their views and opinions -To build relationship with the communities -To register feedback on discussions and questions.	- Important highlights of Project, announcements of planned activities, measures for risk mitigation, overall progress and major achievements.	- Local residents, farmers, municipalities and governmental agencies.
Pre and post survey	A survey will be carried out twice during the project's lifecycle: once during the design phase, and once towards the stability of the project operation.	citizen's experience and feedback about the project	- Local communities.
Mass/social media communication	A social media expert (from PWA's Public Relations Department) will be engaged on the project in order to post information on the dedicated project and PWA Facebook page, PWA website, and to communicate with the local population via social media campaigns or tools	Key project updates; Information on project activities; health and safety Impacts; Project E&S principles;	Local population, and other stakeholders

Method / Tool	Description and Use	Contents	Target Groups
	throughout the project's lifecycle.		
Communication materials	-Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc Website to be updated regularly Short video about the project with interactive content with the beneficiaries to be used during public meetings and on social media platforms.	- Key project updates and reports on the project's environmental and social performance GRM guidebook/manual	PAPs, public and other stakeholders
Tours and site visits	- At appropriate points during the construction phase, site visits or demonstration tours will be organized for selected stakeholders - On average, it is planned that two such tours are planned during the construction period.	Information on project activities; health and safety Impacts; Project E&S principles; and grievance mechanism process	Media, NGOs and CBOs
Information desks	- PWA in coordination with the affected municipalities will set up these information desks in their offices to share information about the project with PAPs and other stakeholders Brochures and fliers on various project related social and environmental issues would be made available at	Information on stakeholder engagement activities, construction updates, contact details of the PWA Social Officer etc.	Local residents and other stakeholders

Method / Tool	Description and Use	Contents	Target Groups
	these information		
	desks.		

4.3. Proposed strategy to incorporate the view of vulnerable groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. The measures will mainly include focus group meetings dedicated specifically to vulnerable groups, where the identified groups are more comfortable asking questions or raising concerns, providing transportation for people in remote areas to the nearest meeting, and choosing accessible venues for events for people with disabilities, taking into consideration all necessary arrangements to ensure audibility and visibility of the presentation involved for different people.

4.4. Proposed strategy for information disclosure

The current PWA website (http://pwa.ps/) is being used to disclose project documents, including those on environmental and social performance in Arabic. PWA will create a webpage on the Project on its existing website. All future project related environmental and social monitoring reports, listed in the above sections will be disclosed on this webpage. Project updates (including news on construction activities and relevant environmental and social data) will also be posted on the homepage of PWA's website. An easy-to-understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/fliers will be posted on the website. Details about the project Grievance Redress Mechanism will be posted on the website. An electronic grievance submission form will also be made available on PWA's website. PWA will update and maintain the website regularly (at least once a quarterly basis). Further, PWA will create a dedicated project Facebook page. Project documents will also be disclosed on the World Bank website. Moreover, all of the disclosed project documents will be available in the affected municipalities.

4.5. Timelines

Information on timelines for project phases and key decisions is provided in Table 4-3.

Table 4-3: Project phases timeline

	Bank	Start of	Pha
Activity	Apprai	implemen	se
	sal	tation	out
Component 1 : Support the operation of the Northern Gaza	Mar-	Mav-Aug	202
NG WWTP and associated facilities including rehabilitation	20		3
and retrofitting		2020	
Component 2 : Limited upgrade of NGEST and TPS facilities	Mar-	Λυσ-20	202
to build resiliency and address emergencies	20	2020 Aug-20	3
Component 3: Capacity building for sustainability of	Mar-	Oct-Nov	202
wastewater services in northern Gaza	20	2020	3
Component 4: Project Management and Implementation	Mar-	Oct-20	202
Support	20	OC1-20	3

4.6 Review of Comments

As explained in more details above, communication and feedback from stakeholders will be taken into consideration at each stage of this project. The PMU-PWA plans to have several public meetings with the target population pre-implementation and post implementation to receive reviews and comments. Based on the targeted stakeholder group, different tools will be considered to report back to them on the final decision and the summary of how their comments were taken into account. These tools, which are discussed in more details in section 7.3, may include:

- Periodic public meetings;
- Follow-up telephone briefings and/or e-mails;
- As part of information disclosure activities;
- Responding to the complaints in writing and verbally.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Implementation Resources

PWA will mobilize human and material resources to implement the SEP and manage the Grievance Resolution Mechanism (GRM). SEP activities will be led by the Project Management Unit (PMU) with relevant responsibilities being taken on by the Project Coordination Unit, and the Public Relations Department. Moreover, a Social Officer will be recruited to be mainly responsible for implementing the engagement activities in coordination with different stakeholders, conducting environmental and social monitoring and reporting.

The material resources that PWA will mobilize are – (i) a specific area on the PWA website; (ii) a Facebook page for the project; and (iii) printed documents (manuals, brochures, posters, etc.) that will be used, based on the needs of the SEP.

5.2. Roles and responsibilities

In order to implement the various activities envisaged in the SEP, the PMU through the SO will need to closely coordinate with other key stakeholders – other national and local government departments/agencies, PWA departments, the Supervision consultants, the contractor along with sub-contractors, affected municipalities and PAPs. The roles and responsibilities of these actors/stakeholders are summarized in Table 5-1.

Table 5-1: Responsibilities of key stakeholders in SEP Implementation

Actor/Stakeholder	Responsibilities				
PMU/SO	Planning and implementation of the SEP;				
	Leading stakeholder engagement activities;				
	Management and resolution of grievances;				
	Coordination/supervision of contractors on SEP				
	activities;				
	Monitoring of and reporting social performance to PMU				
	management and the World Bank.				
Supervision Consultants	Supervision/monitoring of Contractor;				
	Management of engagement activities during the				
	construction phase.				

Actor/Stakeholder	Responsibilities				
Contractors/sub- contractors	Inform PMU of any issues related to their engagement with stakeholders;				
	 Transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by PMU-SO/ Supervision Consultants; Prepare, disclose and implement various plans (e.g. emergency plan, security personnel management plan, etc.); Inform local communities of any environmental monitoring e.g. noise, vibration, water quality monitoring; Announce important construction activities (such as 				
	road closures and available alternatives);				
National Government	Monitor Project compliance with Palestinian legislation;				
institutions - ◆ EQA,	 Participate in the implementation of some activities in the ESMP and SEP; 				
Ministry of Health,Ministry of Agriculture.	 Make available and engage with the public on the ESMP Reports. 				
Affected municipalities	Transfer all complaints to the PWA;				
	Make available the disclosed project documents;				
Project affected people	 Invited to engage and ask questions about the Project at Project Meetings and through discussions with the SO where it is of interest or of relevance to them; Lodge their grievances using the Grievance Redress Mechanism defined in the SEP (Chapter 6). 				

5.3. Estimated Budget

The budget for implementing the stakeholder engagement plan <u>over three years</u> is attached in Table 5-2. The stakeholder engagement activities featured in the budget cover a variety of environmental and social issues, which may be part of other project documents. All of these activities, however, will only be budgeted in this plan that will be covered under Component 4 of the project.

Table 5-2: Estimated budget for three years

Activities	Qua ntity	Unit Cost (USD)	Times/3 years	Total Cost (USD)	
Stakeholder Engagement Activities					
Staff salaries (ESO) (1,500 per month) (The SO will dedicate a time effort of 25% for the implementation of the SEP)	1	18,000	3	54,000	
Project Launch meeting (one for the four the municipalities)	1	800	1	800	
Community meetings	3	800	1	2,400	
Communications materials (posters, pamphlets, including design)	3	1,500	1	4,500	
Survey	2	3,000	1	6,000	

Activities	Qua ntity	Unit Cost (USD)	Times/3 years	Total Cost (USD)
Short video	1	2,000	1	2,000
Project tours for media	1	1,200	2	2,400
Contingency (10%)				7,210
Sub-total - Stakeholder Engagement				79,310
Grievance redress activities				
Communications materials (GRM manual including design)				1,200
Internal GRM training for PWA and contractor staff (Quantity: training hours)	10	200	1	2,000
Contingency (10%)				320
Sub-total – GRM				3,520
Total				82,830

6. Grievance Mechanism

A grievance redress mechanism (GRM) will be in place for this project to ensure that PAPs have the access to a viable system to air grievances and to seek resolution with no intimidation or coerciveness. The grievance system is also important for PWA to ensure they are accountable to complaints and that these complaints are handled transparently and efficiently.

PAPs and other potential complainants should be fully informed of the GRM, its functions, procedures, timelines and contact persons' information both verbally and through booklets and information brochures during consultations meetings and other stakeholder engagement activities.

6.1. Grievance Process

The complaint, in order to be filed, should be related to the project components and/or to its implementation and management. The Social Officer (SO) will be assigned to follow up complaints related to the project. Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed. The grievance resolution process involves the following main steps:

6.1.1. Receipt of Grievances

Anyone from the affected communities or anyone believing they are affected by the Project can submit a grievance: They should be informed during consultation that there are provisions for anonymous complaints for GRM.

 By completing a written grievance registration form that will be available - (i) at the PWA-PMU office in Gaza; and (ii) at the project sites. Grievance registration forms will be provided. The Project's Social Officer will review the received grievances and record them in a Grievance Register.

- Submitting the complaint electronically via e-mail: Dina@pwa-gpmu.org or via the electronic grievance form: https://cs.pmo.gov.ps/Users/Login.aspx.
- Telephone and mobile numbers of the GRM at PWA (+97082644071) and the Social Officer (to be available once hired);
- Sending a written grievance to the fax number: +97082644072.

Where possible it is desirable that complaints are submitted in writing by the complainant. Should the complainant not wish to comply with this request and submit the complaint verbally, then the complainant information and the details of the complaint should be entered in the GRM log. Should the complainant wish to remain anonymous, the GRM staff will still register the complaint details in the system and refer it to the Social Officer for investigation.

6.1.2. Procedures for filing the complaints

The complainant fills in the designated form in writing and signs it, or fills it electronically including all personal information and details of the complaint. The complainant encloses all copies of documents that may support the complaint.

The GRM staff at the PMU will ensure that the form is filled in accurately. The complainant receives a receipt or a confirmation email of acknowledgment with a reference number to track the complaint.

If the complainant choses to file his/her complaint verbally, the GRM employee must register the complainant information and details of the complaint into the system. The complainant will receive a reference number to track his/her complaint.

If the complainant wishes to remain anonymous, the GRM employee will register the complaints details into the system. The GRM employee may request the complainant to provide at least an email address so that the staff may be able to contact him/her for additional information or clarification, and to inform him or her of the solution/decision and of the actions to be taken to prevent a recurrence.

Should the complainant provide his name but wants to keep his personal information anonymous, PWA should ensure the confidentiality of the identity of the complainant.

6.1.3. Registering complaints

The GRM staff will enter the complaint into the GRM log. The complaints register records the following information:

- Complaint Reference Number
- Date of receipt of complaint
- Name of complainant, if provided
- Confirmation that a complaint is acknowledged
- Brief description of Complaint
- Details of internal and external communication
- Action taken: (Including remedies / determinations / result)
- Date of finalization of complaint

Original documentation must be kept infile.

6.1.4. Referral and Examination of complaints

The GRM staff will refer the complaint to the SO for the examination. The SO will inform the complainant that an investigation is underway within three business days. The complainant shall be informed of the estimated duration for resolving the complaint, which is no later than ten business days from the date of receipt of the complaint. Where the complaint is unlikely to be resolved within the estimated duration, the SO must promptly contact the complainant to request additional time and explain the delay. In any event, the complaint must be resolved no later than two weeks from the date of receipt of the complaint. If the complaint is not resolved, the SO will refer the complaint to the Director of the PMU to take the appropriate measures.

The SO will then follow the steps below:

- Verify the validity of the information and documents enclosed.
- Ask the complainant to provide further information if necessary.
- Refer the complaint to the relevant department.
- The SO charges in the relevant department shall conduct field visits for verification, if necessary, and prepare recommendation to the PMU director of actions to be taken and of any corrective measures to avoid possible reoccurrence.
- The SO shall register the decision and actions taken in the GRM log.

6.1.5. Notifying the complainant and Closing the complaint

Notifying the complainant

The SO shall notify the complainant of the decision/solution/action immediately either in writing, or by calling or sending the complainant a text message. When providing a response to the complainant, the SO must include the following information:

- A summary of issues raised in the initial complaint;
- Reason for the decision.

Closing the complaint

A complaint is closed in the following cases:

- Where the decision/solution of complaint is accepted by the complainant, the SO shall close the complaint and sign outcome and date in the Complaint Register.
- A Complaint that is not related to the project or any of its components.
- A Complaint that is being heard by the judiciary.
- A malicious complaint.

6.1.6. Additional Dispute Resolution Scheme

Where the complainant is not satisfied with the outcome of his/her complaint, the following procedures shall be considered:

Internal Dispute Resolution Scheme

The SO shall advise the complainants that if they are not satisfied with the outcome of their complaint, they may readdress the issues with the director of PMU in Gaza and request a further review or consideration.

Where the complainants are not satisfied with the resolution provided by the director of PMU, the SO shall advise the complainants to readdress the issue to the President of PWA.

External Dispute Resolution Scheme

In case the complainants are not satisfied with the internal procedures for handling complaints, the outcomes of the complaints or for any unhandled complaints, the SO shall provide information on a complainant's right to refer their complaint to the Cabinet's Unit for grievances or to the judicial system.

6.2. Feedback/grievance monitoring and recording

The SO work regarding complaints resolution is regulated by the Council of Ministers Decision No. (8) of 2016 and by the Procedure Manual No. (20/17) of 2017. Both documents are made public and published in Arabic on the ministries' websites. A detailed GRM manual that includes guidelines on filing and handling complaints at the project's level will be finalized with the support of the World Bank consultant. PMU-PWA will keep log for grievances and how complaints were resolved within a stipulated time frame and then produce monthly reports for senior management. Grievances/feedback reports include data on numbers of grievances/feedback received, compliance with business standards, issues raised in grievances/feedback, trends in grievances/feedback over time, the causes of grievances/feedback, whether remedial action was warranted, and what redress was provided.

6.3. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complaint directly to the Bank through the Bank's Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service).

A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA.

6.4. Grievance mechanism for workers

The labor management procedures prepared for this project describes the details related to the complaints system that will be prepared by the project contractor to handle workers' grievances for this project during the construction phase. PMU-PWA will require contractors to develop and implement a grievance mechanism for their workforce including subcontractors, prior to the start of civil works. PMU-PWA will also develop and implement a GRM for its workers.

Contractors and PMU-PWA should consider providing an anonymous grievance mechanism (i.e. complaint box) for their employees. The grievance mechanism should give the employer the ability to investigate all anonymous complaints and take actions. Anonymous work complaints should be handled with discretion and confidentiality.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The workers grievance mechanism will include:

- a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline;
- stipulated timeframes to respond to grievances;
- a register to record and track the timely resolution of grievances;
- an assigned staff to receive, record and track resolution of grievances.

Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed. The SO will monitor the contractors' recording and resolution of grievances, and report these to PMU-PWA in the monthly progress reports.

6.5. PWA Contact Information

The point of contact regarding grievance management and the local stakeholder engagement activities is the General Director of the PMU at PWA:

Description	Contact details
Agency:	PWA
To:	Eng. Sadi Ali
	General Director of the Project Management Unit
E-mail:	Sali@pwa-gpmu.org
Website:	http://pwa.ps/
Telephone:	08-2644071

7. Monitoring and Reporting

7.1. Monitoring Reports

7.1.1. During Construction

Monitoring reports documenting the social performance of the Project during construction will be prepared by the SO for submission to PMU-PWA and to the World Bank. These reports will include a section regarding stakeholder engagement and grievance management. Table7-1 proposes a comprehensive set of indicators related to SEP performance at this stage.

Quarterly and Annual Reports by PMU-PWA

During the Project construction phase, the SO will prepare brief monthly reports on social performance for PWA-PMU management; these reports will include an update on implementation of the stakeholder engagement plan and include indicators in Table 7-1. Monthly reports will be used to develop quarterly and annual reports reviewed by senior PMU-PWA managers.

Six Monthly E&S Compliance Reports to the World Bank

Six-monthly reports will be prepared and submitted to the World Bank during the construction period. A section on stakeholder engagement will be included in these reports, which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 7-1.

Table 7-1: SEP indicators to be documented in progress reports

Engagement with PAPs
Number and location of meetings with PAPs
Number of men and women that attended each of the meetings above
Number, location, attendance and documentation of the meetings held with the municipalities and communities or other stakeholders
Minutes of meetings will be annexed to the report. Summarizing the views and comments of attendees.
Engagement with other stakeholders
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, Academia, NGOs)
Issues raised by NGOs and other stakeholders, actions agreed with them and status of those actions
Minutes of meetings will be annexed to the six-monthly report
Any updates of the SEP
Grievance Redress Mechanism
Number of grievances received, in total and at the municipalities, at PMU/PWA office, and on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)
Number of grievances received from affected people, external stakeholders

Table 7-1: SEP indicators to be documented in progress reports

Number of grievances that have been (i) filed, (ii) resolved, (iii) closed, and (iv) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.

Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints.

Trends in time and comparison of number, categories, and location of complaints with previous reporting periods.

Workers Grievances

Number of grievances raised by workers.

Number of workers grievances (i) opened, (ii) resolved, (iii) closed, and (iv) number of responses that satisfied the workers, during the reporting period.

Profile of those who lodge a grievance (gender, age, worksite), by category of grievances.

Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints

Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

7.1.2. During Operation

Annual Reports by PWA

At the end of each year of operation, the SO will prepare an annual summary report on social performance for PMU-PWA management, which will include an update on implementation of the stakeholder engagement plan and include indicators in Table 7-1.

Six Monthly E&S Compliance Reports to the World Bank

During the first three years of operation, six-monthly and annual social compliance reports will be prepared and submitted to the World Bank. A section on stakeholder engagement will be included in these social compliance reports. In addition, PMU-PWA will prepare Incident Notifications for the World Bank, if and when, required.

7.2. Involvement of stakeholders in monitoring activities

The Project provides several opportunities to stakeholders, especially Project Affected Parties to monitor certain aspects of Project performance and provide feedback. GRM will allow PAPs to submit grievances and other types of feedback. Furthermore, frequent and regular community meetings and interactions with PWA staff, especially the SO, will allow PAPs and other local stakeholders to be heard and engaged.

7.3. Reporting back to stakeholder groups

Reporting to PAPs and other stakeholder groups will be ensured, primarily through public meetings in project-affected municipalities. Minutes of meetings will be shared during subsequent public meetings. Feedback received through the GRM will be responded to in writing and verbally, to the extent possible. SMSs and phone calls will be used to respond to stakeholders whose telephone numbers are available. Key Project updates will be posted on

PWA's website. Social media (primarily through the Project Facebook page) will also be used to report back to different stakeholders.

Annexes

Annex I: List of Participants of the Public Consultation Meeting







الورشة التشاورية الاولى / مشروع الإدارة المستدامة لمياه الصرف الصحي في قطاع غزة

سجل الحضور

الساعة: 11:30 صياحاً

التاريخ: 03 نيسمبر 2019

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Annex II: Public Consultation Meeting Agenda

Time	Activity	Responsibility
11:15 – 11:30	Registration	
11:30 – 11:40	Welcoming Remarks	Consultant: Dr. Fahid Rabah
11:40 – 11:50	Presentation of the project components and activities	Project manager: Eng. Mazen Abu Samra
11:50 – 12:00	Presentation of the project E&S impacts	Consultant: Dr. Yunes Mogheir
12:00 – 12:10	Presentation of the draft SEP and the proposed GRM	Consultant: Dr. Fahid Rabah
12:10 – 12:45	Discussion	Social Expert: Mr. Abdelmonem Al Tahrawi
12:45 - 01:00	Recommendations	

Annex III: Photos during the public consultation meeting



Participants



Presentation of Project components and activities



Presentation of Draft SEP and GRM



Presentation of Project E&S Impacts



Discussion lead by the Social Expert



Discussion



Discussion



Discussion

Annex IV: Photos during informal meetings



Meeting with Beit Lahia Municipality



Meeting with Jabalia Municipality



Meeting with Beit Hanoun Municipality



Meeting with Um Al Naser Municipality



Meeting with EQA and the Ministry of Health



Meeting with EQA and the Ministry of Agriculture