

**MULTI-SECTORIAL INVESTMENT PROGRAMME (MIP)
PHASE III GAZA (VP)**

**Environmental and Social Impact Assessment (ESIA)
for Rafah**

Stakeholder Engagement Plan (SEP)

سلطة الطاقة والموارد الطبيعية
Palestinian Energy & Natural Resources Authority



KFW

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ABBREVIATIONS AND ACRONYMS

AC	Alternating Current
CBO	Community Based Organizations
CMWU	Coastal Municipalities Water Utility
DC	Direct Current
E&S	Environmental and Social
EIA	Environmental Impact Assessment
EMMP	Environmental Management and Monitoring Plan
EPC	Engineering, Procurement, and Construction
EQA	Environmental Quality Authority
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standards
FGD	Focus Group Discussion
GEDCO	Electricity Distribution Company of Gaza
GIIP	Good International Industry Practice
ICP	Informed Consultation and Participation
IWGIA	International Work Group for Indigenous Affairs
KfW	Kreditanstalt für Wiederaufbau
kW	Kilo-Watt
MCM	Million Cubic Meters
MIP	Multi-Sectorial Investment Programme
MW	Mega-Watt
NGO	Non-Governmental Organizations
NTS	Non-Technical Summary
PAEEP	Palestine Association for Education and Environmental Protection
PEF	Palestinian Environmental Friend Association
PENRA	Palestinian Energy and Natural Resources Authority
PFESP	Palestinian Fund for Employment and Social Protection
PLA	Palestinian Land Authority
PV	Photovoltaic
PWA	Palestinian Water Authority
SEP	Stakeholder Engagement Plan
SO	Social-Officer
ToR	Terms of Reference
TVET	Technical and Vocational Education and Training
WHO	World Health Organization

1. INTRODUCTION

1.1 Background

For the past decade or so, the Gaza Strip has been suffering from a persisting electricity crisis entailing frequent grid unavailability. This has resulted in intermittent electricity supply where grid availability is in service on a 12-hour ON/12-hour OFF schedule. At the end of 2019, such supply was scheduled on an 8-hour grid-up, followed by an 8-hour grid-down. However, the planned 8-hours grid-up session was in reality often between 5 and 7 only due to additional unscheduled cuts. In general, this results in grid availability averaging around 50% only throughout the year.

The main cause of the grid outages is the immense deficit in installed capacities, as it is estimated that Gaza currently has a demand exceeding 500 Mega Watt (MW) while the average supply does not exceed 200 MW. 120 MW is fed from Israeli transmission lines and around 70 MW are generated by the Gaza Power Plant (GPP) with diesel fuel supply.

It is not clear for how long the current electricity crisis in Gaza will continue. There are some planned measures for improving the situation including renegotiation with the Egyptian government for contribution of around 30 MW. Also, a 161 kilovolt (kV) line from Israel is being planned, which should add another 75 MW and improve the electricity situation in Gaza. However, no clear information about the implementation timeline and funding status have been revealed at this point in time. It is not expected that the electricity supply in the Gaza Strip will improve significantly in the near future (Fichtner, 2019).

The 50% gap in the supply of electrical energy has significant and profound consequences on critical infrastructure elements to include but not limited to water supply, wastewater treatment, healthcare, education – in addition it also entails significant negative impacts on the standard of living for the residents of the Gaza Strip.

Under the “Multi-Sectorial Investment Programme (MIP) Phase III Gaza (VP)”, the Kreditanstalt für Wiederaufbau (KfW) is providing funds for the development of a solar Photovoltaic (PV) plant in Rafah to supply electricity to the National Grid (hereafter referred to as ‘the Project’). The objective of the PV plant installation is to provide a source of electricity supply which would aim to some extent improve the persisting electricity crisis. The PV Plant will be owned by the Palestinian Energy and Natural Resources Authority (PENRA).

KfW Appointed ECO Consult and UG Gaza to undertake the Environmental and Social Impact Assessment (ESIA) for the Project. The ESIA is to be undertaken in accordance with local requirements as well as Good International Industry Practice (GIIP) Environmental and Social (E&S) requirements.

As part of the ESIA process and in accordance with GIIP requirements, a standalone Stakeholder Engagement Plan (SEP) is to be submitted to implemented by PENRA throughout the Project lifetime and duration.

1.2 Stakeholder Engagement Plan (SEP)

This document constitutes a Stakeholder Engagement Plan (SEP) to be implemented by PENRA throughout the planning, construction and operation phase for the Project. The SEP outlines a systematic approach to stakeholder engagement that will help PENRA build and maintain over time a constructive relationship with their stakeholders, in particular the locally affected communities.

The SEP is a live document which will be updated throughout the Project planning, construction, operation and implementation.

The Project welcomes suggestions for improvement of this SEP. Suggestions can be submitted via the contact information for PENRA at the end of this document (Chapter 7).

In particular, this SEP includes the following:

- Chapter 2 – Project Description: provides a summary of the Project location, main Project components, Project schedule and job opportunities for the construction and operation phase;
- Chapter 3 – Regulatory Context: highlights the main requirements that are relevant for stakeholder engagement to the Project to include Palestinian regulations and international best practice requirements;
- Chapter 4 – Identification of Stakeholders: identifies all relevant stakeholders for the planning, construction and operation phase of the Project at all geographic levels to include national, regional and local levels as well as communities within the area of influence of the Project;
- Chapter 5 – Identifies stakeholder consultation and engagement activities undertaken to date mainly as part of the ESIA process;
- Chapter 6 – Stakeholder Engagement Strategy and Plan: identifies an engagement strategy for each stakeholder group to include objective for engagement, communication methods and tools, timeframe and responsibilities.
- Chapter 7 – Contact Details: provides contact details of PENRA for communication with all relevant stakeholders of the Project;
- Chapter 8 – Stakeholder Grievance Mechanism: identifies a mechanism for managing and handling any concerns or complaints related to the Project during the construction and operation phase, particularly from affected stakeholder and communities.

2. PROJECT DESCRIPTION

This chapter provides a detailed description of the Project in relation to its location, the key Project components and an overview of the proposed activities that are to take place during the construction, operation, and decommissioning phase.

2.1 Project Location

The Project site is located within Rafah Governorate in the Gaza Strip, where the closest community settlements include Rafah (300m to the east). Rafah settlement is administratively under Rafah Municipality. The Project site is also located within a vacant area near the Egyptian Borders which are located around 200m to the west.



Figure 1: Project Site and Nearby Communities

2.2 Project Components

The component describe below are typical components for solar PV Projects that will be utilized for the Project.

The key components of the Project are the power arrays which are composed of PV panels which convert solar energy (radiation from the sun) into electricity. Typical PV power array that is composed of PV panels is shown in Figure 2 below. Each array will be installed on a mounting structure (fixed-mounted structures) which carries the array.



Figure 2: Typical PV Power Arrays Composed of PV Panels

Other infrastructure elements needed onsite include:

- Inverters which convert electricity from the panels from Direct Current (DC) to Alternating Current (AC);
- Transformers which increase the voltage produced to the appropriate voltage for utilization;
- Building Infrastructure will mostly include offices for normal daily operational related work, as well as a warehouse for storage of equipment and machinery;
- Road network to include an internal road network for ease of access to the arrays for operation and maintenance purposes;
- Fencing for the ground mounted system only around the entire facility and security will be required to ensure safety from criminal activity and trespassing of unauthorized personnel; and
- All consumables needed for the works and the operation of the site facilities (water, electricity, telecom, etc.) as well as their connection works.

The Project will result in crucial positive environmental and economic impacts on the strategic and national level given the current challenges the energy sector the Gaza Strip is facing. Such positive impacts underpin rationale for the Project. These include the following:

- The Project will provide electricity that will be integrated into the Grid which will contribute to some extent in improving the persisting electricity crisis entailing frequent grid unavailability and intermittent electric supply; and
- Generating electricity through PV power is rather pollution-free during operation. Compared with the conventional way of producing electricity in Gaza, the clean energy produced is expected to reduce consumption of liquid fuels for electricity generation, and will thus help in reducing greenhouse gas emissions as well as air pollutant emissions.

2.3 Project Phases

- Planning and Construction Phase: this phase includes preparation of a detailed design for the Project, planning and transportation of the various Project components to the site (e.g. PV modules), and onsite preparation activities for installation of the PV arrays and various other components. Site preparation activities could include excavations, grading, and land clearing activities.
- Operations Phase: this phase involves operation and maintenance of the PV Power Arrays and all the various electrical equipment. This includes, for example, regular PV module cleaning to prevent dust build-up which could affect their performance. Operation phase also includes commissioning tests which involves standard

electrical tests for electrical infrastructure as well as the panels, and inspection of routine civil engineering quality records.

- Decommissioning Phase (to be determined): the lifetime of the PV plant is expected to be around 25 years, after which the plant is decommissioned and the panels are dismantled. Decommissioning activities could include the disconnection of the various Project components (PV array, inverter stations, etc.) for final disposal.

2.4 Job Opportunities

Summarized below are the anticipated job opportunities for the project during the construction and operation phase.

- A maximum of 150 job opportunities during the construction phase is expected (at peak). This will mainly include engineers, electrical and mechanical technicians, as well as unskilled workers. PENRA will aim to prioritize where relevant job opportunities to the local communities in the area; and
- Around 15 job opportunities during the operation phase to include skilled labor (such as a plant manager, production manager, control engineer, plant administrator, business manager, accountant, etc.) and unskilled labor (such as module cleaners and security personnel) for a duration of 25 years. PENRA will also aim to prioritize where relevant job opportunities to the local communities in the area.

3. REGULATORY AND POLICY FRAMEWORK

3.1 Relevant Palestinian Stakeholder Engagement Requirements & Legislation

Stakeholder consultation and engagement under the Palestinian requirements, is primarily linked to the Environmental and Social Impact Assessment (ESIA) study as stipulated in the “Environmental Law No. (7) for the Year 1999” of the Environmental Quality Authority (EQA).

In accordance with the Law, EQA issued the “Palestinian Environmental Assessment Policy for the Year 2000” which provides additional details on the environmental clearance process and EIA requirements. In specific, Article 8 and Annex 3 identifies requirements related to stakeholder consultation and engagement activities as follows and which are mainly limited to comprehensive and preliminary EIA studies only:

- Stakeholder consultations with all relevant stakeholders is considered compulsory for all comprehensive EIA studies. EQA will notify the developer with the minimum requirements for stakeholder participation to be considered. Such stakeholder consultations could be required during the scoping process preparation, Terms of Reference (ToR) preparation or any other stage of the comprehensive EIA study. All stakeholder consultation and engagement activities should be properly documented and included within the EIA study. In addition, EQA has the authority to request the Developer to arrange for additional stakeholder consultation activities to take into account their concerns and comments on the project and the comprehensive EIA study.
- For preliminary EIA studies, consultations with relevant stakeholders is considered optional but could be required by EQA for some projects – in this case EQA will notify the developer along with the minimum requirements for stakeholder participation to be considered. Such stakeholder consultations could be required during the scoping process preparation, Terms of Reference (ToR) preparation or any other stage of the preliminary EIA study.
- EQA has the authority to undertake consultations activities with relevant stakeholders for the purpose of verifying accuracy of information provided or verifying consultation and engagement activities undertaken as part of EIA studies.
- The preliminary EIA and comprehensive EIA reports should be made available to all relevant stakeholders for review in order to provide any comments as determined by EQA

However, EQA does not require for a Project of this nature and scale an EIA study but only the submission of a form with an Environmental Management and Monitoring Plan (EMMP) in order to obtain an environmental clearance for the Project development. No specific requirements for stakeholder consultation or engagement will be required by EQA for this Project. This has been established based on e-mail communication with EQA for another ~10MW Solar PV Development Project in the Gaza Strip. Therefore, similar requirements to this Project are expected.

3.2 World Bank Requirements

Given that the Project will be funded by KfW it will be required to meet the “Sustainability Guidelines of KfW Development Bank”. The guidelines describe procedures to assess the environmental, social and climate aspects during the preparation and implementation of measures financed by KfW Development Bank. For this, the Guidelines references the Environmental and Social Framework (ESF) of the World Bank Group.

Therefore, the SEP have been prepared in accordance with the World Bank ESF including the World Bank Environmental and Social Standards (ESS). The World Bank ESF and ESS are considered de facto international environmental and social performance benchmark for project financing.

The World Bank ESS 10 is related to Stakeholder Engagement and Information Disclosure which sets out the following recommendations for stakeholder engagement:

- Stakeholder Engagement is an on-going process that may involve: stakeholder analysis & planning, disclosure & dissemination of information, consultation & participation, grievance mechanism, and on-going reporting to Affected Communities.
- A Stakeholder Engagement Plan (SEP) will be developed and implemented that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities.
- Affected Communities will be provided with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.
- When Affected Communities are subject to identified risks and adverse impacts from a project, a process of consultation will be undertaken in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them.
- The extent and degree of engagement should be commensurate with the project's risks and adverse impacts and concerns raised by Affected Communities.
- The consultation process will be tailored to language preferences of Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups.
- For projects with potentially significant adverse impacts, the client will conduct an Informed Consultation and Participation (ICP).
- A grievance mechanism will be established to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance.

4. IDENTIFICATION OF PROJECT STAKEHOLDERS

In order to define a communication process with stakeholders, several stakeholder groups that may be interested and/or affected by the Project development and implementation have been identified. There are a number of groups of people and social groups who are interested in the Project on different levels. These may be described as:

1. People and social groups who will be directly or indirectly affected by the project (such as local communities);
2. People and social groups who may participate in the implementation of the project (such as financiers); and
3. People and social groups whom are not affected by the project development per se may but have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project.

The main groups of stakeholders identified so far are listed in the table below. The list can be updated and modified in the course of the Project development and as a result of cooperation of the parties.

Vulnerable Groups

The stakeholder list also targets vulnerable groups and which are groups expected to be disproportionately affected by the Project impacts. Vulnerable groups are project specific and depend on a range of issues which must be understood such as project location, socio-economic and demographic context, as well as the nature of the development and type of impacts anticipated.

The vulnerable groups within this context were identified to include the following:

- Women Groups: are considered vulnerable groups due to cultural norms within such areas in specific, which could limit their participation in the decision process in general;
- Disabled Groups: are considered vulnerable groups mainly due to physical disability which could limit their access to information on the Project; and
- Elderly Groups: are considered vulnerable groups mainly due to age limitations which could limit their access to information on the Project.

Given the nature and location of the Project there are no additional vulnerable groups which would require special consideration throughout the Project’s consultation process.

Table 1: Identified Groups of Stakeholders

Level of Stakeholder interest in/involvement to the Project
1. Stakeholders who may be directly or indirectly affected by the Project
Residents of the nearby community settlements/municipalities of the Project to include Rafah Municipality located around 300m to the east of the Project location. This includes the following groups within the local communities in specific: <ul style="list-style-type: none"> - Community People: locals have a vested interest in the project due to the positive impacts it provides on the national level in relation to electricity supply as discussed earlier as well as potential for job opportunities. In addition, locals could be impacted by other potential negative impacts however such impacts are expected to be limited and manageable. Such negative impacts are discussed further in the ESIA.

<p>- Business Community (local subcontractors): such groups have a vested interest in the project due to mainly potential for procurement opportunities such as subcontracting works (e.g. civil works, provision of food and amenities, etc.)</p>
<p><u>Women groups</u>: such groups have a vested interest in the project due to mainly due to the positive impacts it provides on the national level in relation to electricity supply as discussed earlier as well as potential for job opportunities. In addition, such groups could be impacted by other potential negative impacts. However, such impacts are expected to be limited and manageable. Such negative impacts are discussed further in the ESIA.</p>
<p><u>Disabled and Elderly groups</u>: such groups could have a vested interest in obtaining updates on project development and implementation schedules. In addition, such groups could be impacted by other potential negative impacts. However, such impacts are expected to be limited and manageable. Such negative impacts are discussed further in the ESIA.</p>
<p><u>Nearby receptors</u>: within the surrounding areas of the Project site the following receptors are identified:</p> <ul style="list-style-type: none"> ▪ To the north is an outstretch of agricultural areas known as Al-Mawasi Agricultural Lands that is used by local communities for various agricultural activities as well as a COVID-19 Quarantine facility ▪ To the south are various small-scale stone crushing/carving facilities as well as Tal El Sultan Wastewater Treatment Plant (WWTP) ▪ To the west is an existing groundwater infiltration facility that is connected to the WWTP after which lies the Egyptian Border.
<p>2. Stakeholders who may Participate in Implementation of the Project</p>
<p><u>Financiers (i.e. KfW)</u>: entities that will provide financing for the Project development. In particular, they have interest in ensuring that the Project is developed and implemented in accordance with their E&S requirements and standards, and will monitor the compliance of the Project against such requirements.</p>
<p>3. Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project</p>
<p>Central Government</p>
<p><u>Environmental Quality Authority (EQA)</u>: state body regulating environmental management and for this Project this will include review and approval of environmental studies submitted, issuance of environmental permit, and monitor implementation of Environmental Mitigation and Monitoring Plan (EMMP) and compliance with other conditions as applicable.</p>
<p><u>Electricity Distribution Company of Gaza (GEDCO)</u>: off taker of excess electricity generated from the Project in specific. They will also be responsible for designing, building and operating the associated interconnection facilities (i.e. Transmission Line) from the ground mounted Project site to its connection point with the national grid.</p>
<p><u>Palestinian Land Authority (PLA)</u>: official governmental entity responsible for overall management of governmental owned lands and for this Project was responsible for allocation the ground mounted Project site location to PENRA for development of the Project.</p>
<p><u>Ministry of Local Government</u>: official governmental entity responsible for overall management of municipalities and other local entities. For this Project, the Ministry acts as the regulatory body for providing all permits and approvals for the project development.</p>
<p><u>Palestinian Water Authority (PWA)</u>: official governmental entity responsible for the management of water and wastewater sector in the Gaza Strip. For this Project, they will be responsible for providing water supply requirement of the Project.</p>
<p><u>Ministry of Tourism and Antiquities</u>: The ministry is the entity responsible for the preservation and protection of the heritage and ancient history within the Gaza Strip. For this Project in specific, the Ministry could have a vested interest in protection of archeology and cultural heritage elements and resources within the Project site.</p>
<p><u>Ministry of Labor</u>: official governmental entity responsible for regulating workforce and labor management. For this Project in specific, the Ministry could have a vested interest in management of workforce in accordance with local labor laws and regulation to include working conditions, occupational health and safety, etc.</p>

<p><u>Ministry of Health</u>: official governmental entity responsible for regulating public health and safety. For this Project in specific, the Ministry could have a vested interest in management of public health and safety from work related activities and tasks.</p>
<p><u>Ministry of Agriculture</u>: official governmental entity responsible for overall development and planning of the agricultural sector.</p>
<p><u>Palestinian Civil Defense Directorate</u>: official governmental entity responsible for providing civil defense services related to firefighting, ambulances and other. For this Project in specific, the Directorate could have a vested interest in implementation of the Emergency Preparedness and Response Plan.</p>
<p>Local Governmental Agencies</p>
<p><u>Rafah Municipality</u>: responsible for providing municipal services for their respective municipality to include water management and connections, wastewater management and connections, solid waste management, and other. In specific, Rafah Municipality will be responsible for providing such services for the Project as well.</p> <p>In addition, the municipality supports the Palestinian Fund for Employment and Social Protection (PFESP) for employment of its residents. PFESP started its work in 2015 as a legal national and centralized entity that facilitates employment of Palestinians in all sectors to include public and private. In addition, the Fund works and partners with various stakeholders to include employers, labor representatives, civil society organizations and other. PFESP established the “Palestinian Employment Portal” as an electronic service and portal that digitizes all services related to employment and self-employment as a reference for all Palestinian job-seekers, and also, for employers in different sectors.</p>
<p><u>Neighborhood Committees</u>: Based on Article (1) of law No. (1) of 1997 regarding Palestinian local authorities, the Neighborhood Committees are formed based on the geographical boundaries of the neighborhoods within each municipality. This is the case for Rafah Municipality.</p> <p>Each Neighborhood Committee is not less than five and not more than thirteen members that are democratically elected by the local communities. The legal period of the neighborhood committee is two years from the election date. The Committee has several tasks and responsibilities but most importantly they are considered to represent the residents of the neighborhood in the municipality and act as a link between the communities and the official governmental bodies. Recently, many Neighborhood Committees in their announcements for candidacy encourage women, disabled and younger people to participate as candidates.</p>
<p><u>Joint Services Council – South</u>: official governmental entity responsible for management and disposal of hazardous waste.</p>
<p>Non-Governmental Organizations (NGOs) and Other Organizations</p>
<p><u>Palestine Association for Education and Environmental Protection (PAEEP), Palestinian Environmental Friend Association (PEF), Agricultural Development Association (PARC), Green Knowledge Society</u>. Those are considered the most active NGO in terms of social and environmental protection and development. Such groups could have a vested interest in obtaining updates on project development and implementation schedules including implementation of Environmental Mitigation and Monitoring Plan (EMMP) and/or employment and procurement opportunities undertaken.</p>
<p><u>Islamic University / Azhar University/ Technical & Vocational Training Institutes in Gaza</u>: Provides knowledge and skills required for various occupations. In specific, within Gaza, the following vocational institutes have programs for Solar PV projects to include the Ministry of Labor Vocational Training Center, Graduate Association of UNRWA, the Continuous Education Center and Community Service, and Mahara Center for Training and Development. Such groups could have a vested interest in participating/providing capacity building and training of local communities within the workforce involved in the Project during the construction and operation phase.</p>
<p><u>Media (Newspaper, Television, Internet)</u>: They could disclose potential information and updates about the Project.</p>

Further to the above, a preliminary stakeholder analysis is undertaken below to clarify stakeholders’ interest in the Project and their ability to influence the Project’s development. Accordingly, a priority contact list is identified.

High rating for priority contact list indicates importance of continuous and regular consultation and engagement. On the other hand, medium rating for priority contact list does not reduce the importance of the entity as a stakeholder but indicates that their engagement is required at specific stages or milestones of the Project (i.e. when the involvement of these entities is triggered for a specific purpose such as obtaining a specific service). The table below is based on the following classification:

Level of interest

- High = 3
- Medium = 2
- Low = 1

Ability to influence

- High = 3
- Medium = 2
- Low = 1

Based on the above the priority is determined based on adding level of interest and ability to influence as follows

- High = 5 or 6
- Medium = 4
- Low = 2-3

Table 2: Preliminary Stakeholder Analysis and Priority Contact List for the Project

#	Stakeholder Group	Level of Interest			Ability to Influence			Priority		
		Low	Med	High	Low	Med	High	Low	Med	High
1.	Stakeholders who may be directly or indirectly affected by the Project									
	Nearby local community from Rafah Municipality			3			3			6
	Vulnerable groups to include women, disabled and elderly.			3			3			6
	Nearby Receptors to include farmers, COVID-19 facility, WWTP operators, etc.			3		2			5	
2.	Secondary Interested Parties/Stakeholders									
	Financiers (i.e., KfW)			3			3			6
	EQA		2				3			5
	GEDCO		2				3			5
	PLA		2			2			4	
	PWA		2			2			4	
	Ministry of Local Government		2			2			4	
	Ministry of Tourism and Antiquities		2			2			4	
	Ministry of Labor		2			2			4	
	Ministry of Health		2			2			4	
	Ministry of Agriculture		2			2			4	
	Civil Defense Directorate		2			2			4	
	Joint Services Council –South		2			2			4	
	Rafah Municipality		2			2			4	
	Neighborhood Committees			3		2				5
	Non-governmental Organizations (NGOs) and Community Based Organizations (CBOs)		2		1			3		
	Education providers (in particular technical / vocational training institutes)		2		1			3		
	Media: Newspaper, Television, Internet		2		1			3		

5. STAKEHOLDER CONSULTATION AND ENGAGEMENT TO DATE

The section below provides a summary of all stakeholders that were previously consulted and engaged throughout the Project – mainly as part of the ESIA that was undertaken for the Project. The section provides a summary of the stakeholder groups that were engaged, date of engagement, and the main objective and outcome.

The objective of such consultations was to:

- Introduce project (rationale, objective, location, key components, etc.)
- Explain and discuss overall methodology for ESIA study
- Explain and discuss key anticipated impacts as relevant
- Identify and determine additional requirements or key issues of concern to be taken into account for the ESIA study

Throughout the consultations a handout was prepared and distributed to such stakeholder groups with key information to include but not limited to rationale for project, project location and setting, key components and activities of the Project and other as applicable. The handout is provided in Annex 5.

5.1 Scoping Session

A scoping session for the Project was held on 28 June 2021 at the Cedar Restaurant in Gaza. The list of invitees was identified jointly by PENRA and the 'ESIA team' taking into account all stakeholder groups which are likely to be affected by the Project directly or indirectly. This included the following entities in particular.

Table 3: List of Invitees to the Scoping Session

No.	Entity
1	Palestinian Water Authority (PWA)
2	Electricity Distribution Company of Gaza (GEDCO)
3	Environmental Quality Authority (EQA)
4	Coastal Municipalities Water Utility
5	Rafah Municipality
6	Minister of Agriculture
7	Palestinian Land Authority (PLA)
8	Ministry of Health
9	Minister of Labor
10	Islamic University
11	Palestinian Environmental Friend Association (PEF) – NGO
12	Agricultural Development Association (PARC) – NGO
13	Ministry of Women Affairs
14	Ministry of Social Development
15	Ministry of Tourism and Antiquities
16	Ministry of Culture
17	Ministry of Local Government
18	Palestinian Civil Defense Directorate
19	Ministry of Public Works and Houses

Throughout the session, attendees raised several issues related to the ESIA study to include impacts on landscape and visual, biodiversity, land use, flood risks, socio-economics, community health & safety, and other. Please refer to the Scoping Report for additional details.



Figure 3: Selected Photos from the Scoping Session

5.2 Focus Group Discussion

The Focus Group Discussion (FGD) for the Project was held on 1 July 2021 at Rafah Municipality Hall. The list of invitees was identified jointly by the ‘ESIA team’ and the ‘Neighbourhood Committees’ of Rafah Municipality to include local community representatives including youth and women representatives.

Throughout the session, attendees raised several issues related to the ESIA study to include impacts on landscape and visual, air quality and noise, socio-economics, health & safety, and other. Please refer to the Scoping Report for additional details.



Figure 4: Selected Photos from the FGD

6. STAKEHOLDER ENGAGEMENT STRATEGY AND PLAN

The table below identifies the stakeholder engagement strategy and plan to include stakeholders relevant to the Project (as identified in Table 1 earlier), objective of consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations.

Table 4: Stakeholder Engagement Strategy and Plan

Stakeholder	Objectives	Communication Methods and Tools	Timeframe/ Engagement Frequency	Responsibility
Stakeholders who may be directly or indirectly affected by the project				
Residents of nearby communities of Rafah Municipality This also includes vulnerable groups (women, elderly and disabled)	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. Summary advertisement in Arabic of grievance mechanism to be posted at key selected local community platforms to include municipality and CBO's (including those targeting women, elderly and disabled). Refer to Chapter 8 for additional details.	Once before construction (to be checked regularly to ensure advertisement in place)	PENRA (CO/SO)
	Neighborhood Committee Members	2. Focus Group Discussions (FGD) with Neighbourhood Committee Members to provide key information on SEP as well as grievance mechanism implementation.	Once before construction Once before operation	PENRA (CO/SO)
	Updates on the Project	1. Prepare leaflet in Arabic with updates on project including the following: (i) project objective and importance; (ii) updates on the project development phase, (iii) number of employment opportunities allocated for local communities, (iv) bidding process for project components, (v) construction plans, etc. Leaflet to be disclosed at key local community platforms to include municipality and CBO's (including those targeting women, elderly and disabled).	Quarterly during construction Annually during operation	PENRA (CO/SO)
		2. Leaflet discussed above to be posted on key social media platforms in coordination with relevant entities (e.g. PENRA Facebook page, Facebook Page of Municipality and CBOs, etc.).	Quarterly during construction Annually during operation	PENRA (CO/SO)

	Announce recruitment and procurement activities/procedures for local communities in accordance with outcomes Local Recruitment and Procurement Plan.	1. Prepare leaflet in Arabic with summary of Local Recruitment and Procurement Procedures that will be implemented. Leaflet to be disclosed at key local community platforms to include municipality and CBO’s (including those targeting women, elderly and disabled).	Quarterly during construction Annually during operation	EPC Contractor / Project Operator / PENRA
	The Local Recruitment and Procurement Plan is to be developed by the EPC Contractor/Project Operator and will aim to identify job opportunities targeted for local communities and a recruitment/procurement procedure that is transparent, effective and provides equal opportunities to all members of the local communities.	2. Leaflet discussed above to be posted on key social media platforms in coordination with relevant entities (e.g. PENRA Facebook Page, Facebook Page of Municipality and CBOs).	Quarterly during construction Annually during operation	EPC Contractor / Project Operator / PENRA
	Communication during critical emergency incidents (e.g., wars) to provide updates to communities on project and any impacts that could affect the operation of the Project (e.g. electricity supply)	1. Direct contact with Neighbourhood Committee Members 1. Post announcement on key social media platforms (e.g. PENRA Facebook Page).	Upon occurrence Upon occurrence	PENRA (CO/SO) PENRA (CO/SO)
Nearby receptors to include farmers, COVID facility, WWTP operators, etc.	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	2. Undertake targeted meetings to provide summary advertisement in Arabic of grievance mechanism to be implemented for the Project.	Once before construction Once before operation	PENRA (CO/SO)
	Updates on the Project	1. Undertake targeted meetings to provide leaflet in Arabic with updates on project as discussed earlier.	Quarterly during construction Annually during operation	PENRA (CO/SO)
Stakeholders who may participate in implementation of the project				
Financiers (i.e. KfW)	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.)	1. Individual/Internal Meetings (if required)	TBD	PENRA as applicable
Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project				
Central and Local Government				
1. EQA 2. GEDCO	Some governmental stakeholders might require to undertake certain inspections	1. Individual/Internal Meetings (if required)	Upon occurrence	PENRA as applicable

3. PLA 4. PWA 5. Ministry of Local Government	or auditing exercises and/or might require certain updates/information on the implementation of the project	2. Correspondence and official letters (if required)	Upon occurrence	PENRA as applicable
6. Ministry of Tourism and Antiquities 7. Ministry of Labour 8. Ministry of Health 9. Ministry of Agriculture 10. Civil Defence Directorate	Updates on the Project	1. Email with leaflet of Project Updates as discussed earlier. Key contact person from each entity to be identified.	Quarterly during construction Annually during operation	PENRA (CO/SO)
EQA	Submission of EMMP to obtain environmental clearance/permit for Project	1. Submission of EMMP & Environmental application approval through official letter	Once before construction	PENRA
PWA	Coordination to secure water requirement of the Project	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor / Project Operator
Rafah Municipality and Neighborhood Committee Members	Determine and agree on the key principles and methodology for implementation of local recruitment and procurement procedure.	1. Focus Group Discussions (FGD) 2. Correspondence and Official Letters	Prior to commencement of construction phase Prior to commencement of operation phase	EPC Contractor / Project Operator / PENRA
Rafah Municipality	Coordination for the collection of solid waste from the site to the approved landfill	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
	Coordination for list of private contractors approved for collection of wastewater from Project site.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Ministry of Tourism and Antiquities	Reporting and communication in case archeologically remains are found through construction of project along	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Upon occurrence during construction upon occurrence once before construction	EPC Contractor

	with chance find procedures implemented.			
Civil Defense Directorate	Submission and discussion of Emergency Preparedness and Response Plan	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters 	<p>Once before construction during construction upon occurrence</p> <p>Once before operation</p>	EPC Contractor/ Project Operator
Joint Services Council – South	Coordination for list of private contractors approved for collection of hazardous waste from the site to approved facilities	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters 	<p>Once before construction</p> <p>Once before operation Decommissioning of the project</p>	EPC Contractor/ Project Operator
Non-Governmental Organizations (NGOs) and Other Organizations				
Non-governmental Organizations (NGOs) and Community Based Organizations (CBOs)	Updates on the Project	<ol style="list-style-type: none"> 1. Email with leaflet of Project Updates as discussed earlier. Key contact person from each entity to be identified. 	<p>Quarterly during construction</p> <p>Once before construction</p>	PENRA (CO/SO)
Media: Newspaper, Television, Internet			Annually during operation	
Education providers (in particular technical / vocational training institutes)	Discuss/agree on potential for coordination and cooperation for training and capacity building of local communities for Project workforce.	<ol style="list-style-type: none"> 1. Focus Group Discussions (FGD) 	When required during construction and operation	EPC Contractor / Project Operator / PENRA

7. CONTACT DETAILS AND REPORTING

Throughout the Project, all stakeholders can contact PENRA throughout the contact details provided below.

Contact Details for the Public

Social Officer (SO) – PENRA

Address:

Telephone:

E-mail:

Fax:

In addition, PENRA intends to provide all relevant information to the public and which will include but not limited to the following:

1. Environmental and Social Impact Assessment (ESIA);
2. Stakeholder Engagement Plan (SEP);
3. Non-Technical Summary (NTS);

The above will be provided at PENRA's website at the following link <http://www.penra.ps>.

In addition, hard copies of the above will be available at the following locations. These documents will remain in the public domain for the duration of the Project, and will be updated as appropriate.

▪ **PENRA Offices – Gaza**

Location:

Tel:

Fax:

8. STAKEHOLDER GRIEVANCE MECHANISM

PENRA understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities and other stakeholders. Monitoring of grievances will signal any recurrent issues, or escalating conflicts and disputes.

PENRA will implement a Grievance Mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. PENRA will accept all comments and complaints associated with the Project and individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Palestine.

PENRA will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below.

Stakeholder Grievance Mechanism

1. A Grievance Disclosure Sheet (Annex 1) will be disclosed at the locations identified below. The Grievance Disclosure Sheet will inform the local communities on how and where to lodge a grievance in accordance with step 2 below.
 - a. Rafah Municipality Office Bulletin Board
 - b. Selected key Community Based Organizations (CBO's) that are considered the most active within the area of influence to include Women, Elderly and Disabled People CBO's to include but not limited to those identified below (list can be updated throughout the implementation phase)
 - *Aisha for Protection of Women and Children (+970 08 2888522 / info@aisha.ps)*
 - *Palestinian Environmental Friend Society (+970 2131506)*
 - *General Union for Disabled Palestinians (+970 22986815)*
 - *Almal Society for Rehabilitation of Disabled People (+970 8 2137692 / elamalraf@yahoo.com)*
 - *Wefaq Society for Women Care (+970 82131366)*
 - *Family Centre - Rafah Services Club*
2. Stakeholders willing to lodge a grievance should be able to use the following avenues:
 - a. Grievance Sheets (Annex 2) with grievance boxes will be made available at the following locations:
 - *PENRA Offices in Gaza*
Location:
Tel:
 - *Project Site*
Location:
Tel:
A designated worker at the Project site will be trained and assigned to handle the grievance mechanism in case stakeholders lodge a complaint at the Project site.
 - b. Direct Contact/email through the following:
 - *Complaints Officer (CO) – PENRA*
0562002451

- c. Submitting the complaint electronically via the electronic grievance form: <http://www.penra.pna.ps/complaintForm>.
3. All grievances (whether submitted through a grievance form, e-mail, telephone, etc.) will be recorded on a grievance log sheet by the CO (Annex 3).
4. Grievance procedure starts with formal acknowledgment in accordance with the preferred method of communication specified by the complainant within 3 working days of submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step. The complainant will receive a reference number to track the complaint.
5. In coordination with the relevant personnel, the CO will analyse the root cause of the grievance, investigate if the grievance is correct or not, and identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable).
6. The CO will prepare a grievance resolution form (see Annex 4) which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. Grievance resolution form will be submitted within ten days from receiving the grievance. Where the complaint is unlikely to be resolved within the estimated duration, the CO 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.
7. The grievance resolution form must be approved and signed-off by the assigned PENRA Project Manager.
8. The outcomes of the grievance resolution form will be communicated to the complainant by the CO in accordance with the preferred method of communication specified.
9. In the case the grievance resolution form identifies proposed actions to be implemented, the CO will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form. The CO will contact the complainant once such actions are completed in accordance with the preferred method of communication specified.
10. The CO will ensure that the grievance forms, grievance log sheet, and grievance resolution form are updated and maintained at all times.
11. The grievance mechanism will be implemented promptly and at no cost and without retribution to the party that originated the issue or concern.
12. The grievance mechanism allows submission of anonymous complaints by community members including females – anonymous complaints can be submitted through all channels identified under Point 2 earlier to include email or phone submission to CO or through grievance sheets. In the case an anonymous complaint is submitted, a special code will be included for the complaint number by the CO. The complaint will be handled confidentially and contact details will not be available for anyone except for the CO and will not be recorded published or disclosed in any way or form. If contact details are available for the anonymous complainer, he/she will be contacted by the CO to provide updates on the complaint's resolution and if no contact details are available, a summary report will be made available as noted under Point 15 below.
13. Where the complainant is not satisfied with the outcome of his/her complaint, the following procedures shall be considered:

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 CO shall provide information on a complainant's right to refer their complaint to the Cabinet's Unit for grievances or to the judicial system including submission electronically via the electronic grievance form: <https://cs.pmo.gov.ps/Users/Login.aspx>.

14. PENRA will keep log for grievances (Annex 3) 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.
15. Based on the above, a report on grievances will be made available to the public. Method and frequency for disclosing such a report will be determined at a later stage and updated within this SEP accordingly.
16. There could be other priority complaints, which due to their nature, will not follow the timeline identified above and will be handled immediately and urgently. Examples of such complaints include the following:
 - Critical complaints related to health and safety of community members (e.g. dangerous driving by project related vehicles)
 - Critical complaints related to health and safety of female community members in specific (e.g. gender-based violence towards female community members by workers)
17. A workers' grievance mechanism will be established for the employees of the Contractors as a separate system. The grievance mechanism should guarantee confidentiality. Workers will be given the possibility to lodge grievances both through workers representatives and unions and independently, personally, regardless of the matter of the complaint. Anonymous lodging will also be made possible. The Grievance Procedure will be free, open and accessible to all and comments and grievances will be addressed in a fair and transparent manner. Information about the procedures, who to contact and how, will be made available as described above. In particular all workers will be informed of the Grievance Process and new workers will be informed when they join the Project. Information on Contact Points will be posted on staff information boards and on-site information boards.

9. ROLES AND RESPONSIBILITIES

This chapter identifies the roles and responsibilities related to implementation of the SEP.

Assigned Project Manager – PENRA

- Ensure resources required are available for the implementation of this Stakeholder Engagement Plan (SEP)
- Oversee the overall implementation of this Stakeholder Engagement Plan (SEP)
- Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.

Complaints Officer (CO) /Social Officer (SO) – PENRA

- Update the SEP as required during the implementation of the project to include construction and operation
- Overall responsibility for implementing the requirements of the stakeholder engagement strategy as identified under Table 4 earlier
- Overall responsibility for implementing the requirements of the stakeholder grievance mechanism to include distribution of grievance disclosure sheets, collection of grievance forms, updating grievance log sheet, and filling grievance resolution.

EPC Contractor / Project Operator

- Implementing the requirements of the stakeholder engagement strategy as applicable and as identified under Table 4 earlier
- Submission of proof of completion of required engagements to PENRA CO/SO

10. ANNEXES

10.1 Annex 1 – Grievance Disclosure Sheet

سلطة الطاقة والموارد الطبيعية Palestinian Energy & Natural Resources Authority



Any stakeholder or local community members willing to lodge a grievance related to the project should use the avenues identified below. The mechanism handles all grievances related to the project to include grievances related to construction or operation activities, inappropriate conduct by workers, and other.

The grievance mechanism will be implemented promptly and at no cost and without retribution to the party that originated the issue or concern. In addition, the use of grievance mechanism shall not impede access to judiciary means and will also allow the submission of anonymous complaints by community members.

Grievance Sheets with grievance boxes will be made available at the following locations:

a. Grievance Sheets with grievance boxes will be made available at the following locations:

- PENRA Offices in Gaza

Location:

Tel:

- Project Site:

Location:

Tel:

b. Direct Contact/email through the following:

- Complaints Officer (CO) – PENRA

0562002451

c. Submitting the complaint electronically via the electronic grievance form:

<http://www.penra.pna.ps/complaintForm>.

10.2 Annex 2 – Grievance Sheet

PUBLIC GRIEVANCE FORM

Reference No.	
Full Name: <i>(anonymous complaints can be submitted)</i>	
Contact Information Please mark how you wish to be contacted and add contact details	<input type="checkbox"/> By Post: <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail: <input type="checkbox"/> Other (please specify)
Description of Concern, Incident or Grievance	What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of concern, incident, or grievance	
<input type="checkbox"/> One-time incident/grievance (date) <input type="checkbox"/> Happened more than once (how many times?) <input type="checkbox"/> On-going (currently experiencing problem)	
What would you like to see happen to resolve the problem?	
Signature:	
Date:	
Please insert this form in one of the grievance boxes	

10.3 Annex 3 – Grievance Log Sheet

Ref No.	How Was grievance submitted	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why

10.4 Annex 4 – Grievance Resolution Form

GRIEVANCE RESOLUTION FORM

How was grievance received	<input type="checkbox"/> Grievance Box (specify which box) <input type="checkbox"/> Directly contact with CO
Reference No:	
Description of Concern, Incident or Grievance: <i>What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>	
Date of Grievance	
Has the Grievance been Resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No; <i>If not provide a justification below</i>
Fill Out Either Section 1 OR Section 2 below	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	

CO Signature:

Assigned Project Manager Signature:

Date:

Date:

