STAKEHOLDER ENGAGEMENT PLAN (SEP)

FOR

Advancing Sustainability in Performance, Infrastructure, and Reliability of the Energy Sector Project (ASPIRE)

January 2020
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I. Introduction

1.1 Project Description:

The project encompasses four pillars that operationalized under several components needed for the electricity sector of WB&G in the short and medium range to address key sectoral issues. Pillar 1 focuses on the transmission, distribution and interconnection infrastructure necessary to import electricity from neighboring countries and improve quality and reliability of power supply across West Bank & Gaza. Pillar 2 focuses on the management of distribution systems for reliability and quality and on demand-side activities to improve revenues and increase efficiency. Pillar 3 seeks to create an enabling environment for the private sector to contribute to the goal of cost-effective, diversification of electricity supply in WB&G through adoption of solar PV technology for own use and as IPPs. Pillar 4 builds on the continuing implementation of reform measures by PENRA and PA to improve the electricity sector’s performance. The MPA corresponding components under Phase 1 of ASPIRE are described below:

**Component 1: Improving infrastructure for regional electricity interconnections in West Bank:** The project activities under this component will be led by PENRA, PETL and in some cases by DISCOs and will focus on strengthening infrastructure for medium and high voltage interconnection and renewables. This would strengthen the ability of PETL to manage electricity supply from Jordan and Israel, into West Bank and Gaza.

Component 1.1: Rehabilitation of PETL-IEC connection points.

Component 1.2: Upgrade of MV powerlines in Nablus, Jenin, Hebron and Gaza to enable additional electricity supply.

Component 1.3: Rehabilitation of Tarqumia Substation.

Component 1.4: Design and Build of MV line and infrastructure between Jericho and Ramallah.

**Estimated Cost**

**Component 2: Improving sustainability of service delivery (Operational performance of Palestinian Electricity Distribution Companies) DISCOs.**

Component 2.1: Revenue Protection Program (stage 2) in West Bank

Component 2.2: Revenue Protection Program (stage 2) in Gaza
Component 3: Enabling Private Sector Engagement in Renewable Energy (RE): The activities under this component will be led by PENRA, in coordination with the DISCOs, relevant line ministries and local commercial banks. The sub-component related to health facilities will be implemented by PENRA in coordination with Ministry of Health. The gender activities as outlined in more detail in Annex 2a will be implemented by PENRA in coordination with the Ministry of Social Development and other experienced stakeholders and with WB support.

Component 3.1: Grid reinforcement and upgrade to enable evacuation of utility-scale RE in West Bank and Gaza.

Component 3.2: Scale-up Rooftop Solar PV systems for Health, MSMEs and Residential Sector.

Component 3.3: Design and Pilot PETL Liquidity Support Account and Payment system.

Component 4: Technical Assistance, Capacity Building and Project Management: the activities under this component will be led by PENRA, who will actively engage the energy sector institutions including PETL, DISCOs in defining the potential pipeline and training needs. The technical assistance will enable PENRA to organize workshops, support feasibility studies, engage experts and ensure adequate dialogue and knowledge-sharing within the sector and in coordination with other line ministries. This component will reinforce monitoring, reporting and evaluation capabilities of the energy sector institutions engaged with this project.

1.2 Objectives of the Stakeholder Engagement Plan

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the construction and operation of the proposed project. The SEP outlines the ways in which PENRA and contractors will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or file complaints.

The project is not expected to cause any physical resettlement, and most probably will be limited to permanent land acquisition and/or impact on land-based livelihoods. In addition, there are some Bedouin communities along the Jericho Ramallah Interconnector that could be affected. Finally, there is the exclusion risk, which is higher in Gaza, as some households and small businesses may not be able to access the Gaza solar revolving fund due to restrictions on banking transactions with financial institutions not recognized by the Palestinian Monetary Authority.

The substantial environmental risks and impacts are related to occupational health and safety (OHS) during construction and maintenance of transmission and distribution lines (Component 1), risks associated with handling hazardous wastes, such as waste oil from transformers, (Component 1) and risks of upgrading small-scale battery recycling to enable select recycling factories to improve their operations requiring management of hazardous materials as part of the TA (Component 4). Other environmental risks including noise, dust and waste handling during construction (Components 1, 2 and 3) exposure to electromagnetic fields (EMF) (Component 1). The social risks are rated as substantial due to the following reasons. The project includes small, medium and large-scale construction, involving possible land acquisition, labor possibility of influx and labor management risks as well as risks related to restriction of land use, community health and safety, and possible exclusion of some groups such as households and small businesses specially in Gaza. In addition,
presence of the Bedouins along Jericho Ramallah interconnector as well as contextual risks and capacity of the implementing agencies, explained below, are reasons for substantial risk category.

2. Brief summary of previous stakeholder engagement activities

Several consultations have been undertaken during September and October 2019 for the preparation of the ESF documents, including this SEP. The stakeholder engagement activities were conducted in different regions, municipalities and with variety of stakeholders (explained below). The stakeholders, including the communities were informed during the meetings that a GRM system will be available to them prior to the implementation phase to file complaints and concerns related to the project activities. A summary of the different stakeholder engagement activities that have taken place to date is provided below. Detailed description of the stakeholder engagement activities for each component and subcomponents is provided in annex 1.

2.1 Methodology:

Three methods were used to engage the stakeholders: a) stakeholder engagement activities that took place in a public venue, inviting different stakeholders, including heads and members of the local councils, land owners, civil society representatives and community member to discuss project’s details and sub-components; b) formal meetings with the electricity distribution companies and municipalities; and c) visits to Bedouin communities to ensure their participation, including female participation.

2.2 Information Disclosure Meetings:

During September and October 2019, the Consultant held five information disclosure meetings in five communities affected by the project’s sub-components: (i) the Rehabilitation of PETL-IEC connection points and (ii) the Upgrade of MV powerlines in Nablus, Jenin, Hebron and Gaza to enable additional electricity supply. The consultant also conducted field visits to the connecting points’ locations that will be rehabilitated in four communities. The meetings aimed to provide the local councils and the communities with the project information and get feedback including expectations, concerns as well as proposed mitigation strategies. The meetings included heads and members of the local councils, land owners, civil society representatives and community representatives. During the meetings, participants were principally interested in learning about the project and the timeline. The Consultant provided the stakeholders with the relevant available information and noted that further engagement activities will need to be conducted.

The table below summarizes the location, date and attendance of each of the five meetings, as well as the key issues that were raised as part of the discussions.

Table 1: Stakeholder meetings held under Component 1: Improving infrastructure for regional electricity interconnections in West Bank & Gaza.

<table>
<thead>
<tr>
<th>Community</th>
<th>Location</th>
<th>Date</th>
<th>Participants</th>
<th>Key points raised</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yasseed</td>
<td>Municipality meeting room</td>
<td>09/10/2019</td>
<td>Ten landowners and two council members</td>
<td>Questions about the Project details and timeline. Participants had concerns regarding the risks of installing medium voltage overhead power towers/lines on the community health. They also had concerns about the value of their lands. They asked questions about the route of the</td>
</tr>
</tbody>
</table>
The community refused the installation of the overhead towers and asked for underground power lines and refused compensations for any land to be taken for the project. Participants asked for opening of 20 meters road before the start of works and that the towers and power lines would be installed after the road opens. Participants requested additional meetings with representatives from PENRA and electricity distribution companies to address their concerns. Participants were informed that a GRM system for filing complaints will be available before the implementation phase.

**Stakeholder meetings held for the rehabilitation of connection points**

<table>
<thead>
<tr>
<th>Community</th>
<th>Location</th>
<th>Date</th>
<th>Participants</th>
<th>Key points raised</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sarra</td>
<td>Municipality</td>
<td>22/10/2019</td>
<td>Two community members attended the meeting including the mayor and a member of the municipal council</td>
<td>Questions about the Project details, timeline and how they can be involved. Participants showed high interest in the project activities, and believed that it will improve access to electricity service for the citizens in the town; reduce the burden of power cuts resulting from outdated networks and increase the land value (price) adjacent to the connection point as a result of improved access to proper infrastructure and facilitated access to the land. Participants were informed that a GRM system for filing complaints will be available before the implementation phase.</td>
</tr>
<tr>
<td>Awarta</td>
<td>Municipality</td>
<td>22/10/2019</td>
<td>Two community members attended the meeting including the head of the village council and the accountant</td>
<td>Questions about the Project details and timeline. Participants said that project will help reduce the electricity bill by at least 18% due to upgrading electricity infrastructure from low voltage to high voltage, improve electricity provision for the citizens and develop the economic activities in the village. Participants were informed that a GRM system for filing complaints will be available before the implementation phase.</td>
</tr>
<tr>
<td>Fondoqomiya</td>
<td>Municipality</td>
<td>23/10/2019</td>
<td>Five people attended the meeting including head of the meeting including head</td>
<td>Questions about the project activities and impact on the electricity costs. Participants showed high interest in the project saying that dealing with (PETL) will improve coordination...</td>
</tr>
</tbody>
</table>
of the village local council, members of the village council as well as representatives of the community and supply of electricity. The rehabilitation of the connection points will help the village council to replace the overhead towers with underground cables. Participants were informed that a GRM system for filing complaints will be available before the implementation phase.

<table>
<thead>
<tr>
<th>Location</th>
<th>Meeting Type</th>
<th>Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qalqilya</td>
<td>Municipality</td>
<td>23/10/2019</td>
<td>Seven persons attended the meeting including three women. Two women representing two women associations and the Branch manager of a micro financing NGO attended the meeting, in addition to the deputy mayor, two members of the municipal council including the head of the gender committee in the municipality. Questions about the Project details, timeline and municipality’s role in the project. Participants showed reservation about the project and its activities. They asked for further information about the project benefits, the upgrade of the electricity voltage, electricity prices and the rights of local laborers. Participants were informed that a GRM system for filing complaints will be available before the implementation phase.</td>
</tr>
</tbody>
</table>

2.2 Formal meetings with the electricity distribution companies

For the purpose of assessing the social impact of upgrading MV powerlines in Nablus, Jenin and Hebron, The Consultant held a meeting at Tubas District Electricity Company TDECO on October, 9th, 2019. Eight people attended the meeting, including five engineers from TDECO, the Planning Manager of the North Electricity Distribution Company, NEDCO, and two representatives from Yasseed village council, where the powerlines will be constructed. Details about the project activities, the role of the distribution companies and the importance of upgrading the powerlines for the area were discussed. The village council representatives raised concerns about building restriction next to the powerlines route. They
requested the construction of the village planned road before upgrading the powerlines in order to avoid any possible encroachment of private land.

2.3 Visits to Bedouin Communities

In total there are about 14 Bedouin communities living along the Jericho Ramallah line, 11 of them are small communities represented by one or two families while two communities are large with about 50 families.

The Consultant visited on October, 27, 2019, three Bedouin communities from the Kaabneh tribe, who live along the Jericho-Ramallah Interconnector, to inform them about the project activities and receive their feedback. The Consultant distributed leaflets with brief description of the project and contact numbers for inquiries. The Bedouin families have been living in the area for more than 20 years; the land they occupy belongs to landowners who live in the neighboring villages of al-Taybeh and Ramoun. Every year, families leave their current locations during summer and move to higher places to avoid the heat. Bedouin women expressed their concerns regarding fire incidents that may be caused by the powerlines specially that these families live in semi-permanent houses made of corrugated metal. Previous incidents occurred by the IEC powerlines installed in the area. Other members of the Bedouin communities showed absolute rejection to the project if it requires moving them from their current location. Families were also informed that a GRM system will be established and communicated to them prior to the implementation phase. The table below summarizes the location, date and number of the community members met with, as well as the key issues that were raised.

<table>
<thead>
<tr>
<th>Community</th>
<th>Location</th>
<th>Date</th>
<th>Participants</th>
<th>Key points raised</th>
</tr>
</thead>
<tbody>
<tr>
<td>Khalayfeh family-Kananeh tribe</td>
<td>Ras Al-Mu’arajat area</td>
<td>27/10/2019</td>
<td>Mr Salman Khalayfeh, the community leader (mukhtar)</td>
<td>Questions about the line, RoW, timeline, risk and safety impacts (families live in semi-permanent houses made of corrugated metal), communication channels and GRM information.</td>
</tr>
<tr>
<td>Yamtein family</td>
<td>Al-Mu’arajat area</td>
<td>27/10/2019</td>
<td>4 women and 1 man</td>
<td>Questions about the project details and route, RoW, timeline, risk and safety issues (families live in semi-permanent houses made of corrugated metal), communication channels and GRM information.</td>
</tr>
<tr>
<td>Khalayfeh family</td>
<td>Al-Mu’arajat area</td>
<td>27/10/2019</td>
<td>3 women and 2 men</td>
<td>Questions about the line, RoW, timeline, risk and safety impacts (families live in semi-permanent houses made of corrugated metal), communication channels and GRM information.</td>
</tr>
</tbody>
</table>

3. Stakeholder Identification and Analysis

The first step in the stakeholder engagement process is to identify the key stakeholders to be consulted and involved. Stakeholders are individuals or groups who are affected or likely to be affected by the project and who may have an interest in the project. 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” (ESF, World Bank, 2018). 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. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups” (ESF, World Bank, 2018).

Stakeholder engagement process for the Advancing Sustainability in Performance, Infrastructure, and Reliability of the Energy Sector has started from identification, mapping and analysis. It is anticipated that this Stakeholder Engagement Plan (SEP) will help clarify the stakeholder identification procedure at the national level for the forthcoming phases.

3.1 Project-affected parties (PAPs)

Project-affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project activities, which includes impact on land, land-based livelihood, access, assets, businesses. Project is in both urban and rural areas. The lines in some areas such as Tubas, pass through populated streets as well as neighboring villages. In some of these areas the ROW has been encroached and there are businesses that are close to the existing lines. In general, the affected parties include land owners, land users, those who have encroached on the land, businesses, and Bedouin communities. Detailed description of the PAPs’ different categories is listed below:

3.1.1 People affected by land acquisition

In the Resettlement Framework (RF) of the project, a key category of PAPs is going to be people losing assets and/or private land and/or access to common resources due to project’s land requirements. Indeed, as the interconnector line will cross private agricultural land, PENRA will have to purchase/compensate for land to locate the towers/poles, as well as the plot where the substation will be located. At tower sites all vegetation within the footprint of the tower base and for a distance of approximately 2 m beyond the base in all directions should be cleared to ground level. In addition, the construction contractor will need to establish working areas near each construction site – for tower. In addition, a corridor along the interconnector between towers will be constituted as a buffer/safety zone. Within the corridor, an area under the energized conductors (the wires) will need to be cleared of vegetation- therefore, trees will need to be cut. PENRA and local authorities will need to place legal restrictions to prevent future buildings from being built in the safety zone. People will be compensated for land as required by Palestinian law and World Bank requirements.

The project will rehabilitate, upgrade and consolidate 170 connection points all over the West Bank. The rehabilitation of some of the connection points may include construction of new rooms that might encroach over private land. Owners of the land adjacent to the rooms will be directly affected as land acquisition might be needed.
People owning or using land in the corridor will thus be a high-priority stakeholder group which will require active and regular engagement as well as the provision of accurate information, in particular around compensation, livelihood restoration schemes, safety zones, building restrictions and electricity works.

3.1.2 People residing in the project areas

In the framework of the current project, a second key category of project affected parties will be the Bedouin communities who live within the RoW and along the area of the transmission line route between Jericho and Ramallah. A 14 km medium voltage line to evacuate imported electricity from Jordan through Jericho to Ramallah will be built and may include some underground cable sections. These PAPs are likely to be affected by disturbances caused by the Project’s heavy vehicles traffic and construction impacts. Bedouin communities depend mainly on herding animals in the area; thus, it is expected that the construction of the line will negatively affect their livelihood. The Bedouin communities may also benefit from project-related employment opportunities.

3.1.3 Local Government Units (Municipalities and village Councils)

Potential change in the tariff system could affect some of the municipalities where some of the 170 connection points are located. The project will rehabilitate 170 connection points that supply electricity to West Bank consumers through electricity networks operated by DISCOs and municipal authorities. Under this project, the management of these connection points will be taken over by PETL as per a pre-agreed schedule. PETL is planning to categorize these connection points into 4 or 5 groups to facilitate the required intervention. The location of connections points falls under the jurisdiction of the municipalities and village councils and in most cases land on which the existing rooms are built is owned or leased by LGUs. The rehabilitation and transfer of the management of the connection points will require active and regular engagement of LGUs as well as the provision of accurate information about the project timeline, the environmental and social impacts, the GRM and tariffs for electricity supply.

3.1.4 Private Sector – Small to Medium Enterprises

1- Female-owned businesses: The project will identify options to support female-owned businesses, especially micro-establishments. In Gaza strip, the project will engage women engineers interested in contributing to the renewable energy market by leveraging WB supported Gaza Women Engineers Network (GWEN). The project activities will focus on investing in women as innovators, enhancing their financial inclusion and mentoring them to build sustainable businesses. These Female owned businesses will be affected positively from the project.

3.1.5 Battery recycling workshops’ workers

The project will support 2-3 small factories (workshops) that recycle batteries to prepare plans to upgrade and retool their operations. Recycling batteries causes severe and potentially for workers and the communities surrounding these workshops. Workers and communities surrounding these workshops will be targeted in the engagement activities to inform them about the severe life threatening health risk of recycling batteries and to avert the negative environmental impact of batteries. The project will also improve working conditions in the existing factories, incentivize them to adopt good business practices and potentially create new job opportunities.
3.1.6 Poor and Vulnerable Households:
The project will pilot the expansion of Gaza Revolving fund for Rooftop PV systems to poor and vulnerable households, particularly female-headed households who represent 9.4% percent of households in Gaza. Female head of households (FHH) are among the most vulnerable of all groups of population. With 63 percent of them over 55 years old and widowed (74 percent), FHHs have limited income generating opportunities with 91 percent are reported as unemployed yet their household consumes the same amount of electricity or slightly more compared to male head of households (per capita). This subcomponent shall engage advisors who can be from unemployed members of low-income households for preliminary face-to-face energy diagnostic and advice on energy efficient products and small RE (solar water heating). Female households and un-employed members of low-income households will be engaged on continuous basis to be informed about the project timeline, their involvement, training, feedback and GRM. Nonetheless, there is an exclusion risk, especially in Gaza, where some households and small businesses may not be able to access the Gaza solar revolving fund due to restrictions on banking transactions with financial institutions not recognized by the Palestinian Monetary Authority. Consultation with this groups to find a solution for this issue is an important part of the SEP.

3.1.7 Health Facilities:
The project will provide additional electricity supply to hospitals and medical clinics in Gaza. Many hospitals suffer from electricity shortages resulting in closure of parts of the hospital, reduced working hours, deferment of elective surgery and in some extreme cases, closure of the hospital. The project activities will support installation of solar rooftop PV in up to 3 additional health clinics and support energy efficiency, including HVAC and lighting in selected facilities in Gaza or West Bank. Selected health facilities will be informed about the project details, timeline and the works that will take place for the installation of the solar rooftops.

3.1.8 Energy Sector Institutions: PENRA, PETL and Electricity Distribution Companies (DISCOs)
The project will provide significant support for technical assistance, capacity building and project management to the energy sector institutions including PENRA, PETL and DISCOs (NEDCO, TDECO, SELCO, HEPCO and GEDCO) and engage them in defining the potential pipeline and training needs. The project will reinforce monitoring, reporting and evaluation capabilities of the energy sector institutions engaged with this project. The project will provide funding for development or upgrade of any master plan required by the energy sector institutions (e.g. DISCOs, PETL) in Palestine. The project also aims toward sustained improvement of operational performance of the five DISCOs in the West Bank and in Gaza. This will include Advanced Metering Infrastructure (AMI), comprising communication devices, software (Meter Data Management System [MDMS]), and a Metering Control Center (MCC).

3.2 Other Interested Parties (OIPs)
The table below summarizes the parties that have interest in the project.

<table>
<thead>
<tr>
<th>Other Interested Parties</th>
<th>Interest in the project</th>
</tr>
</thead>
<tbody>
<tr>
<td>1- Ministries and Government Agencies</td>
<td></td>
</tr>
</tbody>
</table>
Palestinian Electricity Regulatory Council (PERC) | PERC is the tariff-setting and licensing authority over distributors and generators. Drafts and monitor energy rules and regulations including shares, rules, market, concession areas and prices. All objections related to electricity distribution should be reported to this body.

- Ministry of Finance | Ministry of Finance and other key line ministries are important players to ensure payment of government bills, they are included in the discussion on overall sector sustainability.
- Ministry of Health | The sub-component related to health facilities will be implemented by PENRA in coordination with Ministry of Health.
- Ministry of Social Development | The Gaza solar revolving fund for Rooftop PV systems to poor and vulnerable households will be implemented in coordination with Ministry of Social Development.

2- Private Sector Institutions

Palestine Electricity Transmission Limited (PETL) | PETL is a single buyer and transmission system operator that aims to possess transmission lines to regulate the relation between distribution companies and IEC through it. PETL will be responsible for implementing some of the project activities.

Electricity Distribution Companies (DISCOs) | DISCOS will be responsible for implementing some of the project activities. DISCOS will be part of a joint planning platform involving the sector institutions (PENRA, PETL, DISCO, PERC) to enable alignment of PETL’s transmission master plan, DISCOs distribution plans and demand projections from LGUs. The platform will inform future phases and more importantly, will create long-term planning capacity and coordination within the sector institutions.

Local Commercial Banks | The activities for enabling private sector engagement in renewable energy will be implemented in coordination with the DISCOs and the local commercial banks.

3- Academic Institutions

Universities, think tanks | Potential concerns regarding environmental and social impacts

Potential educational/outreach opportunities to increase awareness and acceptance of the project.

4- Women Organizations

Gaza Women Engineers Network (GWEN) | GWEN will help build better education and communication campaigns for women consumers and improve citizen engagement.
5- Other Funding Agencies and Project Developers

| Other project developers reliant on or in the vicinity of the Project (e.g. associated facilities) and their financiers (e.g. Governments (Jordan, Israel), Private Sector, Palestinian Investment Fund) | May require operation of the Project to enable the export of power
Can help identify interactions and cumulative impacts with other proposed developments |
---|---|
6- Local Media

| Press and media (including social media) | Inform residents in the project area and the wider public about the Project implementation and planned activities |

3.4 Disadvantaged / vulnerable Individuals or Groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionally affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies.

The project area includes Bedouin communities classified as vulnerable. Bedouin communities live in the Mu’arajat area along the MV line and infrastructure line to be constructed between Jericho and Ramallah. Additional disadvantaged / vulnerable individuals or groups in the project area include those registered as poor by the Ministry of Social Development and women-headed households. No ethnic or religious minorities are known to be present in project areas, and local people do not rely heavily on provisioning ecosystem services for livelihoods.

In order to ensure disadvantaged or vulnerable needs are taken into consideration, and that they are reached, PENRA will adopt several mechanisms; such as, publishing all information about the project in Arabic, holding workshops or meetings at suitable location that women can easily access, provide needed facilities in public meetings for handicap or people with disabilities and conduct visits to the Bedouin families. In addition, when designing the grievance mechanism, PENRA will take into account the availability of needed recourse for vulnerable groups to give feedback, or send a complaint; for example, if internet option are not available to women at villages, the Project Management Units at PENRA will provide them with alternative options such as a telephone number for GRM.

3.5 Summary of stakeholder interest in and influence over the project

The table provided below summarizes the level of interest in and potential influence over the project of the various stakeholder categories identified above. Categories color-coded in red will require regular and frequent engagement, typically face-to-face and several times per year, including written and verbal information.

Table 4: Analysis and prioritization of stakeholder groups based on level of interest in and influence over the project
<table>
<thead>
<tr>
<th>High level of interest in the project</th>
<th>Medium level of interest in the project</th>
<th>Low level of interest in the project</th>
</tr>
</thead>
</table>
| • People affected by land acquisition  
  • People residing in project areas  
  • Vulnerable households and communities  
  • Ministries and Government Agencies  
  • Health facilities  
  • Private Sector: small to medium businesses: battery workshops’ workers and women engineers’ SMEs | • NGOs  
  • Press and Media | • Academic Funding agencies |
| • Local Government Units: Municipalities and villages | • PETL, DISCOs | • Other project developers and their financiers |

### 4 Stakeholder Engagement Program

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project’s environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project’s environmental and social risks and impacts.
4.1 Purpose and timing of stakeholder engagement program

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 (preparation and design, implementation and construction).

Table 5: Planned stakeholder engagement activities by project phase

<table>
<thead>
<tr>
<th>Project stage</th>
<th>Target stakeholders</th>
<th>Topic(s) of engagement</th>
<th>Method(s) used</th>
<th>Location/frequency</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preparation, Detailed Design and Pre-construction phase</td>
<td>Project Affected Parties - Including people affected by land acquisition; People residing in the project area; LGUs, Private Sector (SMEs and battery workshops); Vulnerable households and DISCOS</td>
<td>ESMF, ESMP, RPF, SEP disclosures. Project scope and rationale; Project E&amp;S principles; receive feedback from PP on the project’s potential impact, expectations and concerns Grievance mechanism process</td>
<td>Public meetings, workshops, separate meetings specifically for women and vulnerable; Social Media Communication - Facebook, WhatsApp; Face-to-face meetings; visits to affected vulnerable groups and individuals; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities and HQ; Grievance mechanism</td>
<td>Project launch meetings in municipalities and DISCOs offices are expected to start within the first two months after appraisal; Monthly meetings in affected municipalities and villages;</td>
<td>PENRA, Environmental and Social Officer; Municipal grievance staff</td>
</tr>
<tr>
<td></td>
<td>Other Interested Parties - External Ministries; Academic institutions; Local Government Units; General public; Women organizations; Local commercial banks and DISCOS</td>
<td>Project information; Grievance mechanism process; Project scope, rationale and E&amp;S principles</td>
<td>Public meetings, workshops; Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, website; Information desks - In Municipalities and HQ; Grievance mechanism</td>
<td>Project launch meetings in municipalities and DISCOs offices are expected to start within the first two months after appraisal; Meetings will be held every six-months or annually as needed.</td>
<td>PENRA, Environmental and Social Officer; Municipal grievance staff</td>
</tr>
<tr>
<td></td>
<td>Other Interested Parties - Internal</td>
<td>Project information - scope and</td>
<td>Face-to-face meetings;</td>
<td>As needed</td>
<td>PENRA PMU; E&amp;S</td>
</tr>
<tr>
<td><strong>Construction phase</strong></td>
<td><strong>Project Affected Parties</strong> - Including people affected by land acquisition; People residing in the project area; LGUs, Private Sector (SMEs and workshops); Vulnerable households and DISCOS; and vulnerable household in Gaza, where some households and small businesses may not be able to access the Gaza solar revolving fund due to restrictions on banking transactions with financial institutions not recognized by the Palestinian Monetary Authority</td>
<td>Land acquisition process (if applicable) Grievance mechanism process; ESCP; Health and safety impacts (Construction-related safety measures); Employment opportunities; Environmental concerns; GBV awareness-raising</td>
<td>Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; individual outreach to Bedouin communities Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, website Information desks - In Municipalities and HQ; Grievance mechanism</td>
<td>Monthly/quarterly meetings in all affected municipalities and villages with ongoing construction; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities on continuous basis</td>
<td>PENRA, Environmental and Social Officer, Contractor/sub-contractors; NGOs/trainers; Municipal grievance staff</td>
</tr>
<tr>
<td></td>
<td><strong>Other Interested Parties (External)</strong> Ministries; Academic institutions; Local Government Units; General public; Women organizations; Local commercial banks and DISCOS</td>
<td>Land acquisition process (if applicable); Resettlement and livelihood restoration options (if applicable); Project scope, rationale and E&amp;S principles; Grievance mechanism process</td>
<td>Face-to-face meetings; Joint public/community meetings with PAPs</td>
<td>Weekly (as needed)</td>
<td>PENRA, Environmental and Social Officer, Contractor/sub-contractors; NGOs/trainers; Municipal grievance staff</td>
</tr>
<tr>
<td>Other Interested Parties (Internal)</td>
<td>Project information - scope, rationale and E&amp;S Principles; Training on Health &amp; safety and sub-management plans; Grievance mechanism process</td>
<td>Face-to-face meetings; Trainings/workshops; Invitations to public/community meetings</td>
<td>As needed</td>
<td>PENRA PMU; E&amp;S officer</td>
<td></td>
</tr>
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<td>-----------------------------------------------------------------------------------------------</td>
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<td>------------------------</td>
<td></td>
</tr>
<tr>
<td>PENRA Staff; Supervision Consultants; Contractor, sub-contractors, service providers, suppliers and their workers</td>
<td>Project Affected Parties - Including people affected by land acquisition; People residing in the project area; LGUs, Private Sector (SMEs and workshops); Vulnerable households, including those who may be excluded from revolving funds in Gaza and DISCOS</td>
<td>Satisfaction with engagement activities and GRM; Grievance mechanism process; transmission infrastructure; Community health and safety measures during TL operation;</td>
<td>Meetings in affected municipalities and villages (every six months); Survey of citizens/PAPs in affected villages; Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (on continuous basis)</td>
<td>PENRA PMU; E&amp;S officer</td>
<td></td>
</tr>
<tr>
<td>Project Affected Parties - Including people affected by land acquisition; People residing in the project area; LGUs, Private Sector (SMEs and workshops); Vulnerable households, including those who may be excluded from revolving funds in Gaza and DISCOS</td>
<td>Project tours for media, local representatives</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Interested Parties (External) Ministries; Academic institutions; Local Government Units; General public; Women organizations; Local commercial banks and DISCOS</td>
<td>Grievance mechanism process; transmission infrastructure; Community health and safety measures during TL operation;</td>
<td>Public meetings, trainings/workshops; Mass/Social Media Communication - Facebook, WhatsApp; Disclosure of written information - Brochures, posters, flyers, website; Information desks - In Municipalities and HQ; Grievance mechanism</td>
<td>Meetings in affected municipalities (every six months); Communication through mass/social media (as needed); Information desks with brochures/posters in affected municipalities (on continuous basis)</td>
<td>PENRA PMU; E&amp;S officer</td>
<td></td>
</tr>
</tbody>
</table>
4.2 Description of Methods and Tools

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, 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 LGUs and announcements through the mosques at those villages or localities. The mosque is usually considered an efficient tool of information at small localities; it can be used to inform the community and also to encourage active participation of the different stakeholders. If a large audience is expected to attend a public meeting or a training workshop, 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 the 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 PENRA is provided in the table below. The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.

*Table 6: Engagement Methods and Tools*

<table>
<thead>
<tr>
<th>Method / Tool</th>
<th>Description and Use</th>
<th>Contents</th>
<th>Target Groups</th>
</tr>
</thead>
<tbody>
<tr>
<td>Correspondences (Phone, Emails,</td>
<td>- To distribute information to Government officials, NGOs, and Local Governments</td>
<td>Introduction of the project and information about time and venue of meetings</td>
<td>Government officials, district offices staff, local government council members and staff, health facilities, universities</td>
</tr>
<tr>
<td>official letters)</td>
<td>- To invite stakeholders to meetings and follow-up</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Formal meetings</td>
<td>To inform the Project Platform about the project progress</td>
<td>- Project status</td>
<td>Project Platform</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Plans for next period</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Issues and changes</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Progress of the communication campaign</td>
<td></td>
</tr>
<tr>
<td>Public meetings</td>
<td>- To present project information affected parties and larger communities</td>
<td>Important highlights of Project, announcements of planned activities, measures for risk mitigation, overall progress and major</td>
<td>Affected people in the project area of influence - Public venues: DISCOS offices, municipalities. Residents in the project area</td>
</tr>
<tr>
<td></td>
<td>- To allow participants to provide their views</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Method / Tool</td>
<td>Description and Use</td>
<td>Contents</td>
<td>Target Groups</td>
</tr>
<tr>
<td>--------------</td>
<td>---------------------</td>
<td>----------</td>
<td>--------------</td>
</tr>
<tr>
<td><strong>Focus group meetings and workshops</strong></td>
<td>Used to facilitate discussion on Project’s specific activity and/or facility in question, including a presentation and an interactive Questions &amp; Answers session with the participants.</td>
<td>Project’s specific activities and plans, design solutions and impact mitigation/management measures that require detailed discussion with affected stakeholders.</td>
<td>Directly affected parties in the project area: youth, elderly, women, and other vulnerable groups.</td>
</tr>
<tr>
<td><strong>PENRA’s Websites</strong></td>
<td>To promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project’s engagement activities with the public.</td>
<td>Information about Project development updates, health and safety, employment and procurement, ESMF, ESCP and Project-related materials.</td>
<td>Directly affected communities and any other stakeholders and interested parties.</td>
</tr>
<tr>
<td><strong>Printed materials and Site-Specific Signs</strong></td>
<td>To announce information to Project stakeholders on a regular basis to maintain awareness of the Project development. To provide site specific project information.</td>
<td>Important highlights of Project achievements, announcements of planned activities, changes, and overall progress.</td>
<td>Affected communities</td>
</tr>
<tr>
<td><strong>Site visits and techniques to be used to ensure their inclusion such as reach out visits to individuals or families at their homes; holding separate small group discussions and awareness for</strong></td>
<td>To gather opinions and views from individual stakeholders through visiting project site</td>
<td>Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.</td>
<td>Affected stakeholders and vulnerable groups</td>
</tr>
<tr>
<td>Method / Tool</td>
<td>Description and Use</td>
<td>Contents</td>
<td>Target Groups</td>
</tr>
<tr>
<td>--------------</td>
<td>---------------------</td>
<td>----------</td>
<td>--------------</td>
</tr>
<tr>
<td>men and women at an easily accessible venue; and reaching out to women through Women Associations to ensure inclusiveness.</td>
<td>To announce workers grievance mechanism and any information on project progress</td>
<td>Employee Grievance Procedure; Updates on Project development.</td>
<td>Project Employees and workers</td>
</tr>
<tr>
<td>Staff handbook. Regular meetings with the staff. Posts on information boards in the offices and on site.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 4.3 Proposed strategy for information disclosure

Information on the project’s components and sub-components as well as the project’s different implementation stages will be disclosed to people, such as the purpose of the project, project elements, project expected timeline, and type of activities involved. The types of methods that will be used to communicate this information to each of the stakeholder groups will vary according to the target audience. These methods will include meetings with the targeted audience, workshops, announcement in the local mosques and on the municipalities Facebook pages and websites. Additional methods will be through the local newspapers and the local radio stations.

The current PENRA website ([http://www.penra.pna.ps/](http://www.penra.pna.ps/)) will be used to disclose project documents, including the SEP in both Arabic and English. MOE will create a webpage on the Project on its existing website. All future project related environmental and social monitoring reports will be disclosed on this webpage. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project’s evolving environment.

For stakeholders who live in remote areas such as the Bedouin communities, visits will be conducted to the targeted audience to get their comments on the engagement plan and suggestions for improvement will be included in the plan. Posters and leaflets will be placed, in the schools and clinics. The strategy should include means to consult with project-affected stakeholders if there are significant changes to the project resulting in additional risks and impacts. Following such consultation, an updated ESCP will be disclosed.
4.4 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 recruitment of Environmental and Social Officer (ESO) will help to ensure proactive outreach to all population groups. Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of specific techniques for vulnerable groups, mainly persons with disabilities, women-headed household and unemployed persons. Such techniques may include reach out visits to individuals or families at their homes; holding separate small group discussions and awareness for men and women at an easily accessible venue; and reaching out to women through Women Associations to ensure inclusiveness.

If necessary, PENRA will provide transport to public meetings for vulnerable people, and will also deliver brochures and informational material to such households. These approaches help the project to reach out to the groups who are likely to be insufficiently represented at community gatherings.

The following are suggested strategies to incorporate the view of vulnerable groups:

- Identify the vulnerable affected groups for each sub-component.
- PENRA will coordinate with specialized local community institutions that have direct communication with vulnerable population to ensure inclusion.
- Ensure that public meetings are announced through channels that reach the vulnerable populations (i.e. public school, mosques, leaflets, etc.).
- Ensure that the language of informed consent is comprehensible to the group and use of project materials in Arabic.
- Ensure that venues for public meetings are accessible to vulnerable groups.

4.5 Review of Comments

As detailed above, communication and feedback from stakeholders will be taken into consideration at each stage of this project. PENRA plans to have several public meetings with the target population prior to implementation and post implementation to receive reviews and comments. Further, focus group meetings and one-on-one meetings with stakeholders will be held as well. In addition, PENRA plans to use the ‘Complaints and Suggestions link’ displayed on its website to receive complaints and feedback from the population. Prior to implementation, information about the website and/or phone numbers of the PMU will be disclosed to public.

5 Resources and Responsibilities for Implementing Stakeholder Engagement Activities

5.1 Resources and Implementation Arrangements
PENRA will mobilize human and material resources to implement the SEP and manage the Grievance Redress Mechanism (GRM). PENRA has considered an allocation for the implementation of the SEP activities. PENRA shall hire and train an Environmental and Social Safeguard Officer (ESO) who will be the main focal point through the design and construction phase and will follow up on the implementation of the SEP. The ESO will include stakeholder engagement activities in the periodical reports submitted to PENRA and the WB. A communication specialist and facilitator from the Public Relations Department, will be an integral part of the project Team. Environmental and Social experts will be responsible for the environmental and social impact assessment and performance of the Project. Specific named personnel will be established for these roles as the project progresses. Additionally, PENRA, in collaboration with PETL and DISCOs, will play an important role in building communication with the local communities and the different stakeholders to ensure proper awareness and engagement.

Moreover, PENRA will be responsible for the preparation and production of information material concerning the project’s activities and the GRM. The material resources that PENRA will mobilize are – (i) a Project specific area on PENRA website; (ii) an electronic grievance database; (iii) a stakeholder engagement register; (iv) a Facebook page; (v) printed documents (manuals, brochures, posters, etc.) that will be used, based on the needs of the SEP.

5.2 Roles and Responsibilities

The Environment and Social Safeguard Officer and the Electricity Transmission General Department will take responsibility for and lead all aspects of the stakeholder engagement. However, to implement the various activities envisaged in the SEP, the ESO will need to closely coordinate with the key stakeholders. The roles and responsibilities of these actors/stakeholders are summarized in the Table below.

**Table 7: Responsibilities in SEP Implementation**

<table>
<thead>
<tr>
<th>Actor/Stakeholder</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| PENRA, ESO                         | • Planning and implementation of the SEP;  
                                 | • Leading stakeholder engagement activities;  
                                 | • Management and resolution of grievances;  
                                 | • Coordination/supervision of contractors on SEP activities;  
                                 | • Supervision/monitoring of RP (if triggered) and Implementation Consultants;  
                                 | • Monitoring of and reporting on environmental and social performance to Project Management and the World Bank |
| Implementation Consultants         | • Supervision/monitoring of Contractor;  
                                 | • Management of engagement activities during the construction phase |
| Contractors/sub-contractors         | • Inform PENRA of any issues related to their engagement with stakeholders;  
                                 | • Transmit and resolve complaints caused by the construction activities in close collaboration with PENRA;  
                                 | • Prepare, disclose and implement various plans (e.g. ESMP, Labor Management Plan, etc.);  
                                 | • Inform local communities of any environmental monitoring e.g. |
noise, vibration;
• Announce important construction activities;

5.3 Estimated Budget

A tentative budget for implementing the stakeholder engagement plan over seven years is attached in Table 8. PENRA will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. The budget will be revised accordingly.

Table 8: Stakeholders Engagement Plan- Estimated Budget

For the estimated budget please refer to the Environmental and Social Management Framework (ESMF). The ESO officer will dedicate a time effort of 15% for the implementation of the SEP.

<table>
<thead>
<tr>
<th>SEP implementation</th>
<th>1-2 visits /week</th>
<th>50</th>
<th>16,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site visits</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>consultation sessions</td>
<td>50</td>
<td>50</td>
<td>2,500</td>
</tr>
<tr>
<td>Training sessions for contractors</td>
<td>3</td>
<td>1000</td>
<td>3,000</td>
</tr>
<tr>
<td>GRM communication material</td>
<td>(leaflets, GRM boxes, Manuals)</td>
<td></td>
<td>5,000</td>
</tr>
<tr>
<td>GRM management / Database</td>
<td></td>
<td></td>
<td>20,000</td>
</tr>
<tr>
<td>Information disclosure (including media)</td>
<td>8</td>
<td>1,000</td>
<td>8,000</td>
</tr>
<tr>
<td>Internal Training</td>
<td>7</td>
<td>500</td>
<td>3,500</td>
</tr>
</tbody>
</table>
6. Grievance redress mechanism

The Grievance Redress Mechanism (GRM) addresses grievances in an efficient, timely and cost-effective manner, that arise in the Project, either due to actions by PENRA or the contractor/sub-contractors employed by PENRA, from affected communities and external stakeholders. A separate mechanism is developed to address worker grievances. PENRA is responsible for managing the GRM, but many of the grievances on the Project will likely relate to the actions of the Contractor and so will need to be resolved by the Contractor. PENRA with the support of the Implementation Consultant will administer the GRM process deciding whether they or the Contractor is responsible and determining the best course of action to resolve the grievance. The Implementation Consultant will support PENRA to monitor grievance resolution being undertaken by the contractor.

The project GRM deals with the issues of land and other assets acquisition (e.g. amount of compensation, suitability of residual land plots, loss of access roads, loss of livelihood, etc.) as well as the losses and damages caused by construction works, and any direct or indirect environmental and social impacts. Therefore, the grievance redress mechanism has to be in place by the time PENRA starts preparation of RP (if applicable), ESIA and shall function until the completion of all construction activities and beyond till the defect liability period ends. PAPs and other potential complainants should be fully informed of the GRM, its functions, procedures, timelines and contact persons both verbally and through booklets and information brochures during consultations meetings and other stakeholder engagement activities. PENRA will keep a log of the complaints at hand.

Typical grievances related to the project activities are:

1. Land acquisition and physical displacement
2. Loss of land value due to project’s activities
3. Loss of access to private properties or assets due to project activities
4. Physical damages to health and wellbeing during project construction phase and post-construction phase
5. Damages to residents’ source of income like crops, trees or livestock.

PENRA will implement an effective GRM, with the objective of helping third parties to avoid resorting to the judicial system as far as possible. Complainants can seek redress from the judicial system at any time. The step-by-step process does not deter them from approaching the courts. All grievance related correspondence will be documented and the grievance resolution process will be systematically tracked.

6.1 Grievance Process

The Environmental and Social Officer (ESO) will be assigned to follow up complaints related to the project. The complaint, in order to be filed, should be related to the project components and/or to its implementation and management. 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:

- By completing a written grievance registration form that will be available - (i) at the local municipalities and in the affected villages (i.e. those within proximity of construction activities); (ii) at the entrance of each construction site; (iii) on the Project’s website; and (iv) at the Project’s headquarters in Ramallah and Gaza. Grievance registration forms will be provided. The Project’s Environmental and Social Officer will review the received grievances and record them in a Grievance Register.

- Electronically: the complainant files a complaint electronically using the electronic GRM forms on the ministry website: www.penra.pna.ps/x
- By telephone: the complainant can call the following numbers:
  - PENRA Ramallah: +970 2 2984752
  - PENRA Gaza: +970 9 238477
  - ESO mobile once hired: TBD
  - By email: ESO@penra.ps

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.

6.1.2 Procedures for filing 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 GRM staff at the Complaints Unit 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.

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
- 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 on file.

6.1.4 Referral and Examination of complaints

A GRM system will be established, which include a GRM Committee. The ESO 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 ESO 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, the ESO will refer the complaint to the Director of the PMU to take the appropriate measures.

The ESO 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.
• ESO charge 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 ESO 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 ESO 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 ESO 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 ESO 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 ESO shall advise the complainants that if they are not satisfied with the outcome of their complaint, they may readdress the issues with the DG of PMU at PENRA and request a further review or consideration.
  
  Where the complainants are not satisfied with the resolution provided by the DG of PMU, the ESO shall advise the complainants to readdress the issue either to the President of PENRA.

- **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 ESO shall provide information on a complainant’s right to refer their complaint to the Cabinet’s Unit for grievances or to the judicial system.

**6.1.7 Reporting**

The ESO shall review the Complaints Register regularly for the purpose of providing analysis and reports on complaints to the Director of the PMU and the World Bank periodically. The report shall include number of complaints received, handled and closed. It shall also include analysis on systemic and recurring problems. This will assist the project management in determining the cause of complaints and whether remedial action is warranted.

Periodic Reporting shall be as following:

- A monthly report to the project management at the PMCU.
- A quarterly or semi-annual report to the project management at the World Bank.

**6.2 Feedback/grievance monitoring and recording**

There is a Complaints Unit at PENRA. The Complaints Unit headed by ESO work 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 has been prepared with the support of the World Bank consultant. PENRA 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](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:
6.4 Workers’ Grievance Mechanism

PENRA will require contractors to develop and implement a grievance mechanism for their workforce prior to the start of civil works. The construction contractors will prepare their labor management procedure before the start of civil works, which will also include detailed description of the workers grievance mechanism.

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.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. 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 ESO will monitor the contractors’ recording and resolution of grievances, and report these to PENRA in their monthly progress reports.

6.5 PENRA Contact Information

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

<table>
<thead>
<tr>
<th>Description</th>
<th>Contact details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency: PENRA</td>
<td></td>
</tr>
<tr>
<td>To:</td>
<td>Mr. Abdel Hadi Barakat</td>
</tr>
<tr>
<td></td>
<td>General Director of the Project Management</td>
</tr>
<tr>
<td>E-mail:</td>
<td><a href="mailto:abarakat@penra.pna.ps">abarakat@penra.pna.ps</a></td>
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<tr>
<td>Telephone:</td>
<td>02-2984752</td>
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Information on the Project and future stakeholder engagement programs will available on the Project’s website. Information can also be obtained from the ESO. Six-monthly E&S reports that document the implementation of the Stakeholder Engagement Plan (SEP) will be disclosed on the Project website.
7. Monitoring and Reporting

The Stakeholder Engagement Plan will be periodically revised and updated as necessary in the course of project implementations in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.

7.1 Reporting back to stakeholder groups

Reporting to stakeholders involves providing important details on the undertakings, routines, status, and the project’s progress. Reporting to stakeholders may also include new or corrected information since the last report. Keeping track of the many commitments made to various stakeholder groups at various times, and communicating progress made against these commitments on a regular basis, requires planning and organization.

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation will be collated by the ESO and referred to the management in PENRA. The monthly summaries will also provide information about the number and the nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of an annual report that includes information on project’s engagement with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
  - Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
  - Frequency of public engagement activities;
  - Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas within the Project area;
  - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
  - Type of public grievances received;
  - Number of press materials published/broadcasted in the local, regional, and national media.

8. References


ANNEX 1: Detailed Stakeholder Engagement Description

Detailed description of the stakeholder engagement activities conducted for component one “Improving infrastructure for regional electricity interconnections in West Bank” is provided below.

Component 1.1: Rehabilitation of PETL-IEC connection points

On October 22 and 23, 2019, the Consultant held several meetings in four communities affected by the rehabilitation of the connection points. The consultant has also conducted field visits to each of the connecting points location in the four communities. The meetings aimed to provide the local councils and the communities with the project information and get feedback including their expectations, concerns as well as proposed mitigation measures. The meetings included heads and members the local councils, civil society representatives and community representatives. During the meetings, participants were principally interested in the details of the project and provided feedback. The Consultant provided the stakeholders with the relevant available information and noted that further engagement activities will be conducted.

The Consultant held two meetings in Sarra and Awarta villages in Nablus governorate on October, 22, 2019. The mayors, members of the municipal council as well as representatives of the community attended the meetings. Participants in both meetings showed high interest and support for the project saying that the project will have positive social impact on their communities by improving access to electricity service for the citizens in the town, reducing the burden of power cuts resulting from outdated networks and increasing the land value (price) adjacent to the connection point as a result of improved access to proper infrastructure and facilitated access to the land. In Awarta village participants said that project will help reduce the village electricity bill by at least 18% due to upgrading the electricity infrastructure from low voltage to high voltage, improve electricity provision for the citizens and develop the economic activities in the village.

The Consultant held two engagement meetings on October, 23, 2019 in the Fondoqomiya village in Jenin governorate and Qalqilya city. Attended the meeting in the Fondoqomiya village the head and members of the village council as well as representatives of the community. Participants showed high interest in the project saying that dealing with (PETL) will improve coordination and supply of electricity. The rehabilitation of the connection points will help the village council to replace the overhead towers with underground cables. In Qalqilya, the consultant met with the deputy mayor, members of the municipal council, a representative of the NGOs in the town and representatives of the community. Participants showed significant reservation about the project and its components. The attendees stressed that the local community might object to PETL taking over the management of the connection points in the city. Lack of clarity about the benefits of PETL taking over the management of the connection points in the city and lack of trust in governmental entities due to corruption and nepotism were the main reasons for community’s objection. The Deputy mayor requested further details about the project activities, the benefits of the project for the municipality and the population, as well as the role of the municipality during and after the implementation of the project activities. Participants asked further information on the procedures to be taken by PENRA to ensure high quality electricity provision. They have also asked questions about the capacity to increase electricity voltage to accommodate urban expansion, the impact on electricity tariffs once PETL take over the management of the connection points and the measures that PENRA will take to protect local workers’ rights and not to substitute them with workers from PETL.
Component 1.2. Upgrade of MV powerlines in Nablus, Jenin Hebron and Gaza to enable additional electricity supply

For the purpose of assessing the social impact of upgrading powerlines between Jenin and Nablus, an initial community consultation session was held with land owners from Yasseed village on October, 9th, 2019. A second meeting was also held at Tubas District Electricity Company TDECO on the same day. The main topic of the meetings this far has been to share information about the project activities, communicate with the local population and identify their needs and interests. Landowners expressed concerns about losing access to their land, the inability to build on their land as well as the devaluation of the land because of the towers. Participants explained that they lack trust in the distribution company TDECO because the company had previously erected towers in their land without informing them and that the tower’s location is not within the street’s right of way. The participants explained that the project may harm the village Flora and that the project’s activities will trespass over the farmers’ private land and not within the road’s Right of Way. The images below show the land plots alongside the proposed transmission line:
Component 1.4: Design and Build of MV line and infrastructure between Jericho and Ramallah

The Consultant visited on October, 27, 2019, three Bedouin communities from the Kaabneh tribe who live along the interconnector line to inform them about the aim of the visit, the project activities and receive their feedback. Families were also informed that a GRM system will be made available to them prior to the implementation phase. The Consultant distributed leaflets with brief information about the project including contact numbers for inquiries. The Bedouin families have been living in the area for more than 20 years; the land they occupy belongs to land owners from the neighboring villages of Taybeh and Ramoun. Every year, families leave their current locations during summer and move to higher places to avoid the heat.
and has been living in that particular land for the past 15 years. Mr Salman said that he knew about the project and that he would not object to it as long as it is constructed within the RoW and will not encroach on his house and animal structures.

Figure 4: Field visit to al-Khalayfeh Family (Ras al-Muarajat Area)

The Consultant also met with Al-Yamtein family. During the visit, separate meetings with women and men were conducted. Alia al-Yamtein, head of a household, said that the Mokhtar should be consulted on matters concerning the families under his authority including future communication and coordination for information dissemination sessions about the project. She expressed concerns about the project activity saying that the project would endanger their lives because they live in semi-permanent homes made of corrugated metal. The family lives within few meters from the main road. When asked if they would consider moving away from the road’s RoW, Alia explained that the nearby area is very rocky and inhabited with an Israeli settlement and therefore it would be very difficult to move in any direction. One of the family members asked to design the line’s route to be on the other side of the road so that the power lines do not pass over the homes.
The Consultant conducted a visit to Abu Awwad family. Khadra Abu Awwad, said that her family along with three other families (Khaled, Suleiman and Khalil) fall under the authority of the Mukhtar Mohammed Izheiman. Khadra expressed safety concerns about the project. She explained that the project would endanger the lives of the people living in the community. Two years ago, one of the lines installed by the IEC on top of a nearby hills caused fire to the nearby structures and was extinguished by the local herders. She also feared adverse health effects on the community residents since they live in semi-permanent homes made of corrugated metal. During the visit, Mr. Mohammed Izheiman, showed concerns about the project’s activity saying that the project will encourage future economic activities in the area such as the quarries and that would disturb their way of living and have negative impact on their livelihood.
Annex II

List of participants in the stakeholder engagement meetings:

<table>
<thead>
<tr>
<th>No.</th>
<th>Name</th>
<th>Affiliation</th>
<th>Contact No.</th>
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<tbody>
<tr>
<td>1</td>
<td>محمد سواري</td>
<td></td>
<td>0598756390</td>
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<tr>
<td>2</td>
<td>عادل كرمان</td>
<td></td>
<td>0799280727</td>
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<td>3</td>
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<td>7</td>
<td>فكري</td>
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<td>8</td>
<td>صلاح</td>
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<tr>
<td>9</td>
<td>خالد</td>
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<tr>
<td>10</td>
<td>مازن</td>
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37
**Stakeholders Meeting**

**Name of Project:** Advancing Sustainability in Performance, infrastructure, and Reliability of the Energy Sector in the West Bank and Gaza ASPIRE Project

**Meeting Venue:**

**Time:**

**List of Attendees**

<table>
<thead>
<tr>
<th>No.</th>
<th>Name</th>
<th>Affiliation</th>
<th>Contact No.</th>
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<tbody>
<tr>
<td>1</td>
<td>Fathay Aisha</td>
<td>Tech-adviser</td>
<td>0591/34400</td>
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<tr>
<td>2</td>
<td>Jamal Musleh</td>
<td>Tech.-manager</td>
<td>0590/2160</td>
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<tr>
<td>3</td>
<td>Ayoob Frehat</td>
<td>NEDCO</td>
<td>0598907782</td>
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<tr>
<td>4</td>
<td>Abdellaq Noorjaha</td>
<td>TDECO</td>
<td>0599285865</td>
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<tr>
<td>5</td>
<td>Alia Saleh</td>
<td>An Najah</td>
<td>0599853926</td>
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<tr>
<td>6</td>
<td>Alia Saleh</td>
<td>Nijah Pol</td>
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</tr>
<tr>
<td>7</td>
<td>Qamar Saleh</td>
<td>Nijah Pol</td>
<td>0595859002</td>
</tr>
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<td>8</td>
<td>仇美雅 Jarea</td>
<td>TDECO</td>
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<td>9</td>
<td>Eng. Asma Khaleel</td>
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<td>10</td>
<td>Eng. Reena Darghinah</td>
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<td>0597261844</td>
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<tr>
<td>11</td>
<td>Nidal Restothena</td>
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<tr>
<td>12</td>
<td>Wadih Musleh</td>
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<tr>
<td>13</td>
<td>Abeer Muhnini</td>
<td>WB</td>
<td>0598219819</td>
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