Lebanon Wind Power Project Stakeholder Engagement Plan

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1. INTRODUCTION

1.1. Objectives

The overall objective is to promote the informed participation of all stakeholders (i.e., national and local government institutions, local communities and other interested parties) involved through dialogue and agreements on decision making on issues related to project implementation; and contribute to the social development of local communities, through actions and programs in the Project's area of influence, for a sustainable presence in the region. Specific objectives are as follows:

1. To build strong, constructive, and responsive relationships with all stakeholders for the successful management of the Project's environmental and social impacts.
2. To define an approach for ongoing stakeholder engagement and information sharing with local governmental authorities, local communities and service providers to promote socio-economic benefits (i.e. job creation and social development).
3. To strengthen links with the various stakeholders, listening and informing to reach consensus, credibility, trust and support for Project activities and future endeavors.
4. To contribute to and support adaptive management and problem-solving processes through monitoring and evaluation of planned mitigation measures.

1.2. Methodology

The LWP Project has been involving stakeholders since 2017 in several participatory processes led by the Projects' proponents and Project Coordinator with a focus on providing relevant Project information to all villages within the Projects' direct and indirect areas of influence and gathering villagers' opinions about potential benefits, impacts and mitigation measures of the Project (see **Section 5**).

Some of the stakeholder activities performed by LWP prior to the development of this plan are:

- Identification of stakeholders from the direct and indirect areas of influence.
- Disclosure of relevant information through key informant interviews, household surveys, community meetings, newspaper articles, TV shows and Facebook.
- Conducting public consultation activities.
- Periodically gathering stakeholder opinions and recommendations.

While all these previous actions implemented by LWP are aligned with IFC PS1 and ESS 10, none of them were formalized in an overarching document. In that sense, a core objective of this Stakeholder Engagement Plan is to formalize all procedures and methods used previously by LWP and develop an overarching plan that complies with IFC PS1 and EIB ESS 10.

The Non-Technical Summary of the ESIA (in both Arabic and English) will be made available at the Community Relations representative office in Kfartoun and in each Municipal Office within the Project's Direct Area of Influence.

1.3. Project Description

The considered development consists of construction of a wind farm along with the auxiliary technical infrastructure in the Akkar Governorate in the northeast of Lebanon, approximately 182km northeast of the capital city of Beirut. The Developer holds a signed PPA to construct and operate the Project to provide a maximum licensed capacity of 68.3MW (plus 10%) to be delivered to the public grid.

One of three OEM/EPC Contractors are currently under consideration by the Developer for construction and operation of the wind farm, Vestas Wind Systems A/S, Siemens-Gamesa and GE. Depending on the OEM/EPC Contractor selected, the wind farm will comprise up to 16 wind turbine generators (WTGs) with rated outputs ranging between 4.2MW and 5.3MW, as presented in **Table 1-1**.

Table 1-1 Potential OEMs, Turbine Power Ratings and Turbine Locations

OEM/EPC Contractor	Turbine Power Rating	No. of Turbines	Power Generated by Turbines	Total Power Generated
VESTAS	4.2MW	16	67.2MW	67.2MW
Siemens	5.0MW	13	65.0MW	65.0MW
GE	5.0MW	2	10.0MW	68.3MW
	5.3MW	11	58.3MW	

The entire investment will include the following components:

- Up to 16 WTGs.
- Underground cable networks (electric and fiber-optic control and communication cables).
- External and internal access roads.
- Power substation and temporary and permanent maintenance buildings.
- Parking/laydown/assembly areas.
- Community Relations Office (CRO) building to be located in Kfartoun.
- Underground electric transmission line connecting the Project substation to the substation at the Sustainable Akkar wind farm.

1.3.1. Project Location

The Project is located on a mountain ridge of Jroud Akkar at an altitude ranging between 1,200m (3,840 feet) above sea level (asl) in the north of the Project and 2,190m (7,008 feet) asl in its south.

The Project site can currently be accessed by Quobaiyat-Qasr Road which connects to Rweimeh Village and Kfartoun to the northeast, and beyond to Mqaible. The largest cities in the Akkar Governate are Halba, Bire Akkar and Qoubaiyat. The Project is located in Fnaidek, Karm Chbat Nature Reserve and Rweimeh Village. **Figure 1-1** presents the location of the Project in proximity to villages, noting there are none to the south. The distance to village centers nearest the Project are as summarized in **Table 1-2**.

Figure 1-1 Project Location

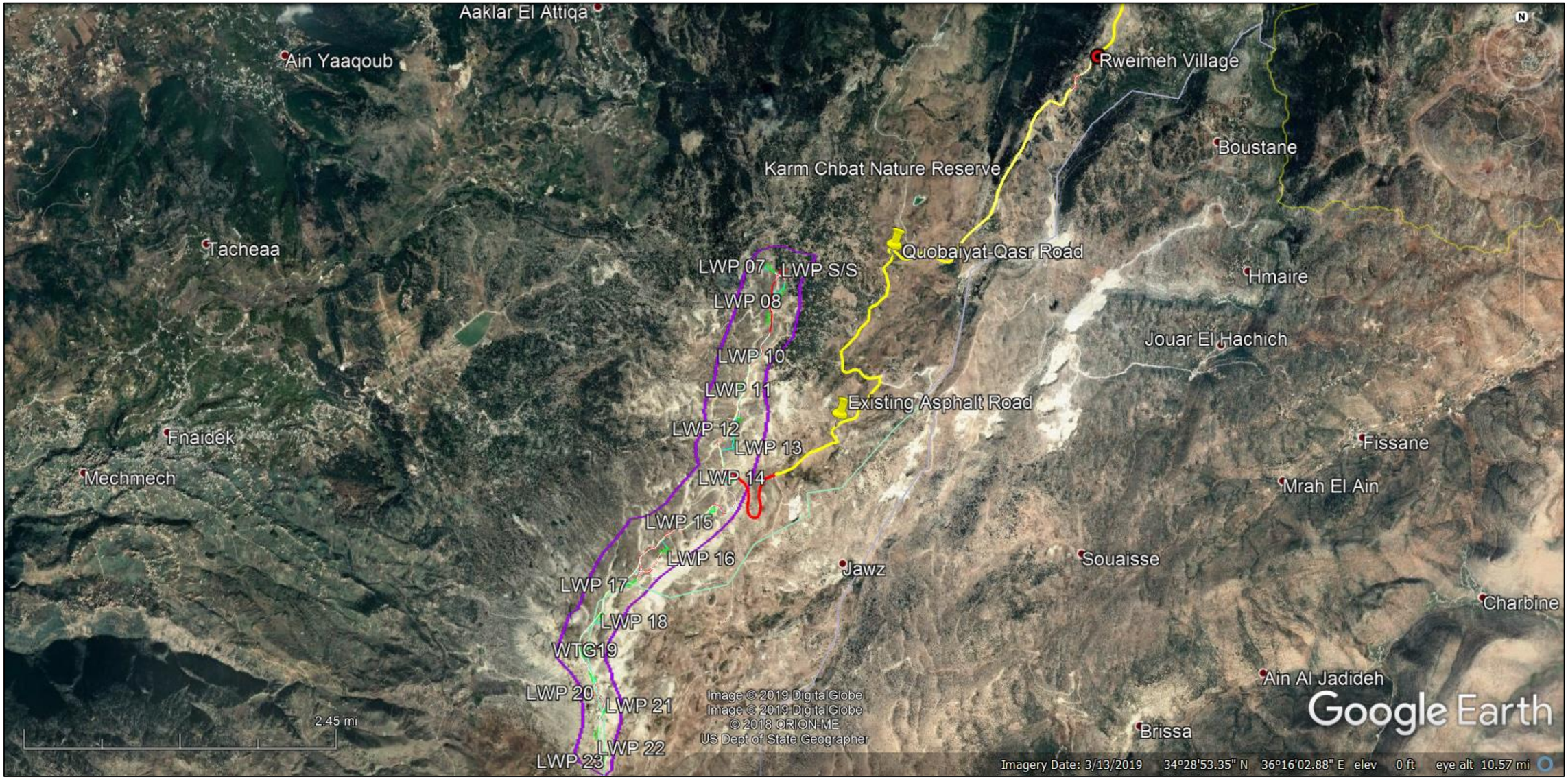
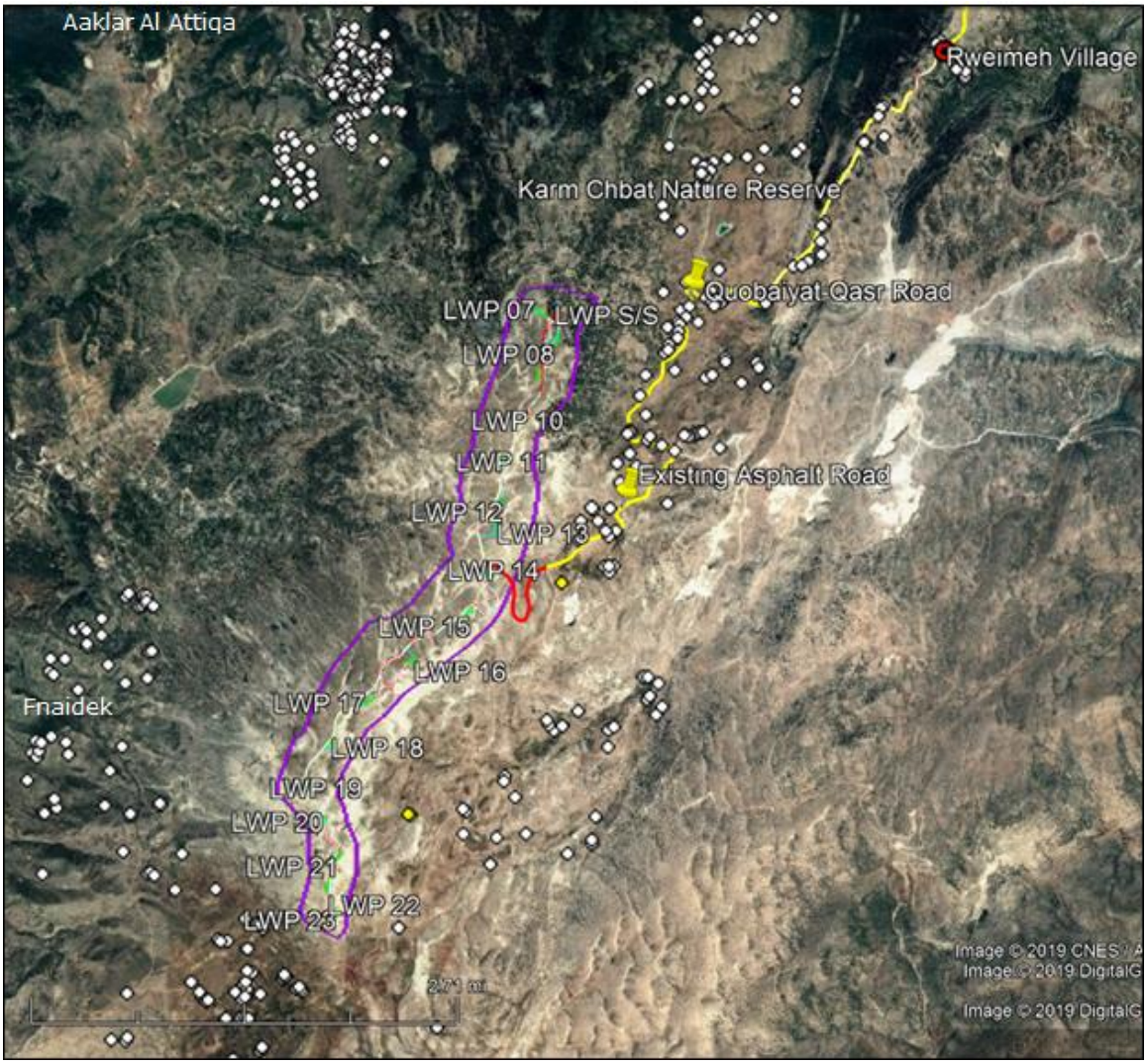


Table 1-2 Distance to Village Centers Nearest the Project

To the East/Northeast	To the West	To the North/Northwest
Jawz – 1.5km.	Fnaidek – 5km.	Aaklar Al Attiqa – 3.3km
Souaisse – 4.6km.	Tacheaa – 6.7km	Rweimeh Village – 4.5km.
Jouar El Hachich – 5.5km	Mech Mech – 6.5km	Ain Yaacoub – 6.4km

In addition to the main villages, individual houses located near the Project are shown in **Figure 1-2,** with the nearest houses within 3km assessed for noise, shadow flicker and visual impacts (Note: yellow dots are uninhabited houses). The houses north and east of the Project are considered part of Rweimeh Village, the houses to the west are considered part of Fnaidek, and the houses to the northwest are considered part of Aaklar Al Attiqa.

Figure 1-2 Houses Near Project



1.3.2. Project Components

The Project comprises the construction and operation of up to 16 horizontal axis wind turbines to provide a maximum licensed power capacity of 68.3MW (plus 10%) to be delivered to the public grid.

1.3.2.1. Wind Turbines

Generally, a wind turbine consists of a foundation, tower, nacelle, rotor blades, a rotor hub, and a transformer. The foundation is used to bolt the tower in place. The tower contains the electrical conduits, supports the nacelle, and provides access to the nacelle for maintenance. Typically, three (3) blades are connected to the hub which then connects with the nacelle; the box-like component that sits atop the tower and which most importantly contains the gear box (which steps up the revolutions per minute to a speed suitable for the electrical generator) and the generator (which converts the kinetic energy into electricity).

Each turbine and associated platform will occupy a maximum surface area of 3,500m^2. Foundation platforms will be constructed to bolt the tower of the turbine in place.

The OEM/EPC Contractor will be constructing platforms (one for each turbine). A crane pad next to each wind turbine to accommodate cranes for the installation of the wind turbines and for maintenance activities during operation. The crane pads will be suitable to support loads required for the erection, assembly an operation and maintenance of the turbines.

The wind farm design considered wind resources in the specific Project site, spacing between the turbines to minimize wake effects which could lead to a decreased wind energy production, accessibility to the turbines, etc., as well as environmental considerations as presented throughout the ESIA.

1.3.2.2. Transmission Lines and Power Substation

The wind turbines will be connected at the switchgear panels through a 36kV medium voltage (MV) cross linked polyethylene (XLPE) cabling system to a substation located within the Project site. The connection between the turbines and the substation will be made using underground transmission cables buried in ground by trenches. A new sub-station will be installed at the Project site, between Turbines LWP 07 and LWP 08. The Project substation will be connected by a 30cm diameter transmission line to the neighboring Sustainable Akkar Wind Farm Project substation to be located within its boundary.

The transmission line will be buried within an existing ~3.25m wide track through the Karm Chbat Nature Reserve, previously created by recreational hunters and navigating around vegetation and under tree canopies, until reaching the existing, asphalt 2-lane Quobaiyat-Qasr Road. The transmission line will then follow the Quobaiyat-Qasr Road right-of-way (ROW) for 7km until entering the Sustainable Akkar wind farm and connecting to the shared Sustainable Akkar/EDL substation, before the generated electricity being injected into the EDL transmission line. Two possible design options are possible, consisting of either a 33 to 66KV or a 33 to 220KV substation.

1.3.2.3. Operation Buildings

Two separate operation buildings shall be constructed, one building to be used by the OEM/EPC Contractor and their contractors, and the other to be used by the grid operator, EDL. The operation buildings will include the following:

- A storage space for spare parts, lifting equipment, placement of batteries, tools and spare oil.
- A control room for communication equipment, medium voltage switchgear room, working station for the monitoring of the Project.
- A meeting room and facilities for maintenance personnel as deemed necessary, but as a minimum will include a kitchen, changing room, lounge or living room, toilets and showers.

1.3.2.4. Community Relations Office

As part of the Project development, a member of the local community has been hired as the first of three Community Relations Officers (CRO)s. A Community Relations Office will be established in Kfartoun using leased office space (to be shared with the Sustainable Akkar wind farm project; specific location to be determined). The Community Relations Office will remain open through the construction, operation and decommissioning phases of the Project. The purpose of the Community Relations Office will be as follows:

- Establish a skills training program for members of the local communities.
- Maximize the hiring of local workers.
- Maximize the local procurement of construction materials and other goods and services.
- Establish a location for the receipt of community grievances and to provide Project information.

1.3.2.5. Meteorological Masts

Three meteorological masts, MM1, MM2 and MM3 (Enisolar 80m and 60m models), are currently installed. Each mast includes first class advanced top and low anemometers, wind vanes, a humidity and temperature sensor, an air pressure transducer, a data logger box, an aviation light and a top lighting rod. The data recorded by the mast is automatically sent twice daily to the Developer via internet. The currently installed meteorological masts will be removed at the start of wind turbine erection activities and will be replaced with new masts to be installed by the selected OEM/EPC Contractor.

1.3.2.6. Road Development

The wind turbine components will be transported from the Tripoli seaport to the Project site using a combination of existing asphalt roads, new asphalt road segments, and existing and new tracks internal to the proposed Hawa Akkar, Sustainable Akkar and Lebanon Wind Power wind farm sites. The transport route can be described as follows:

1. Tripoli Seaport to Outside Chadra: The existing 2-, 4- and 6-lane asphalt road between the Tripoli Seaport to outside Chadra will be used.
2. Outside Chadra to the entrance of the Hawa Akkar Wind Farm: New sections of road will be constructed as follows:

- In order to avoid impacts to Chadra, Machta Hassan and Machta Hammoud, a new 0.65km section of asphalt road will be constructed through currently vacant land purchased from private land owners. The new road section will connect with the existing asphalt road outside of Machta Hammoud.
- A new 0.15km section of asphalt road will be constructed between two existing sections of asphalt road in order to avoid hairpin turns near homes.
- A new 3.0km section of gravel road will be constructed within the existing railroad right of way (ROW) managed by Machta Hammoud Village, traveling east before connecting to an existing asphalt road to enter the Hawa Akkar Wind Farm.

3. The route traverses a network of internal tracks to be constructed within the Hawa Akkar Wind farm, exiting at the Sahle Checkpoint before entering the Sustainable Akkar Wind Farm. The route traverses a network of internal tracks to be constructed within Sustainable Akkar, exiting at Qoubaiyat-Qasr Road.
4. The route travels south along Qoubaiyat-Qasr Road for approximately 3.5km. Upon reaching an existing asphalt road, the route turns south for 4.8km, where a new 1.5km section of track will be constructed to enter the Project site near LWP 14.

The transport of WTG components to the Project will not begin until all civil works to construct road segments has been completed, including internal tracks through Hawa Akkar, Sustainable Akkar and Lebanon Wind Power. All communities along the transport route have been engaged with to address potential concerns related to the frequency, timing and duration of the transport activities and access to roads, school, employment and livelihoods as discussed in **Section 4**. For further details, refer to Section 6 of the Stakeholder Engagement and Consultation.

Further, a new 3.0km section of gravel road will be constructed within the existing railroad right of way (ROW) managed by Machta Hammoud Village, traveling east before connecting to an existing asphalt road to enter the Hawa Akkar Wind Farm.

2. POLICY, LEGAL AND INSITUTIONAL FRAMEWORK

Existing national legislations and policies related to environmental protection, land classification, and environmental control requirements are analyzed in the ESIA. Relevant international treaties, conventions and protocols ratified by Lebanon are equally reviewed. In addition, institutions that are directly and/or indirectly responsible for the supervision and/or enforcement of the implementation of existing regulations are identified and their role analyzed. Finally, international guidelines used in the ESIA are described.

2.1. National Framework and Requirements

2.1.1. Existing Legislation

The ESIA process follows the stipulations of key national laws and regulations which are summarized in Table 4-1 in Section 4.1.1 in the ESIA. The major legal texts are further described in the subsections below.

The ESIA is also based on the requirements and conditions set by the MOE in their response to the Scoping Report. The main national legal framework which is considered in the framework of this ESIA are the following:

- Law 444/2002[1] related to Environment Protection, and its related Application Decree No. 8633/2012 on the Fundamentals for Environmental Impact Assessment.
- Law 462/2002[2] related to the Electricity Sector which sets up the rules and principles governing the Electricity sector, with the aim to bringing in the private sector as a partner in power generation in Lebanon. This law was further updated in 2014 by Law 288.
- Law 48/2017[3] related to Public Private Partnership (PPP) that encourages private sector investments in the public sector.
- Application Decree 2366/2009[4] related to the National Physical Master Plan for the Lebanese Territory (NPMPLT) covering land use and zoning of lands.
- MOE Decision No. 52/1[5] of 29 July 1996 setting air quality standards, including thresholds for air pollutants and safe noise exposure limits.

The legal basis for EIA and its 9 annexes is established in the Environmental Law No. 444/2002 and Law No. 690/2005.[6] Law No. 444 emphasizes the principle of EIA as a tool for planning and management, and stipulates that proponents undertake assessment for all projects likely to affect the environment due to their sizes, nature, impacts or activities for review and approval by the MOE.

This legislation is further implemented by Decree No. 8633/2012: Fundamentals of Environmental Impact Assessment and the MOE's Decision 261/1 of 2015: Review Process for EIA scoping and EIA reports.[7]

[1] Chapter 4, Article 21-23 [Annex 1] of Law 444/2002.
[2] Law 462-2002 product of electricity EN, EDL, Lebanon, 2002.
[3] Article IV, Law 48 dated 7/9/2017 Regulating Public Private Partnerships.
[4] Decree No 2366 of 2009 defining the Comprehensive Plan for Lebanese Territory Arrangement.
[5] MoE Decision 52/1 of 1996: National environmental quality standards.
[6] Law No. 690 of 2005 regulating the Ministry of Environment and defining its tasks and competences.
[7] Decision 261/1, 12/6/2015, MOE, EIA Review Procedures.

Further, all development projects must adhere to the environment quality standards for air, water and soil (MOE Decision 52/1 of 1996) as well as to air emission standards and wastewater discharge (MOE Decision No 8/1 of 2001).[8]

The law and the decree assign full authority to the MOE to arrange the screening, review, control, and follow-up of the EIA process and its implementation. The approval of an EIA is a pre-requisite for any subsequent license or permit by any or all other relevant authorities that may be required prior to construction. The efforts of the MOE aim at improving the Lebanese environmental performance on the international level, alike all developed countries, and the coordination, cooperation and follow up between the MOE and concerned parties, as the private and public sectors or the civil society organizations that may have a real positive impact on achieving a global unified vision related to all what concerns the protection of the environment.

2.1.2. National Requirements for Stakeholder Engagement and Public Participation

Based on the Application Decree No. 8633/2012 related to the "Fundamentals for Environmental Impact Assessment", if an EIA is required, the project proponent should ensure local participation at several stages of the EIA process. At the scoping stage, Article 7 of the decree stipulates the following requirement concerning public participation:

- The Ministry of Environment will require that the Project owner informs all concerned stakeholders including ministries, municipalities and NGOs of the preparation of an EIA Report.
- Once advised, the municipality (or the governor or commissioner in case there is no municipalities) where the Project will be located, should immediately advertise the Project to inform the public. The advertisement should be placed on a public bulletin board and at the location of the Project for a period of 15 days requesting comments from the public. The Ministry of Environment will also give the public a chance to provide feedback to the Ministry or the official department concerned within one month from the date of the advertisement publication.
- The Project owner shall submit to the Ministry of Environment a report pertaining to the EIA scoping of the project including attachments of the remarks communicated to him, all incoming comments, the original minutes of public dialogue meetings or the minutes of bilateral meetings with the parties involved.

For the EIA report, Article 12 of the decree related to "Information Publication" confirms the right of the public and the parties involved in the project to have access to the final EIA Report. Moreover, Law 28 of 2017 on the Right to Access to Information has confirmed the right of any person, to access to information and documents available within the administration.

Based on the above, the national regulations require an initiation of the consultation process supporting public participation at the outset of the EIA/ESIA process and allow continuous access to information related to the Project.

[8] The Minister of Environment's decision No. 8/1-2001, Setting national standards and criteria regarding air pollutants and liquid wastes generated by classified establishments and wastewater treatment plants.

2.2. International Conventions, Treaties and Protocols

International conventions, treaties and protocols which are triggered by the current project are provided in Table 4-5 in Section 4 of the ESIA.

2.3. International Guidelines

LWP is seeking Project Financing from Bank Audi, and as such, the following international guidelines apply (together with the Lebanese legislative requirements, referred to as 'the Applicable Standards'):

- International Finance Corporation (IFC) Performance Standards (PSs).
- Environmental and Social Standards (ESSs) of the European Investment Bank (EIB)
- International best practice, policies and guidelines including:
  - IFC's General Environmental, Health, and Safety (EHS) Guidelines (2007).
  - IFC's EHS Guidelines for Wind Energy (2015).
  - IFC's EHS Guidelines for Toll Roads (2007).

2.3.1. IFC Performance Standards

The IFC is a sister organization of the World Bank and member of the World Bank Group (WBG). It is the largest global development institution focused exclusively on the private sector in developing countries. The WBG has set two goals for the world to achieve by 2030: end extreme poverty and promote shared prosperity in every country.

The IFC aims at leveraging products and services to create markets that address the biggest development challenges. It applies financial resources, technical expertise, global experience, and innovative thinking to help clients and partners overcome financial, operational, and other challenges. IFC is also a leading mobilizer of third-party resources for projects.

IFC' Performance Standards (PSs) on Social and Environmental Sustainability, previously published in April 2006 and updated in January 2012, including IFC's Environmental, Health, and Safety (EHS) Guidelines (2007), IFC's EHS Guidelines for Wind Energy (2015) and IFC's EHS Guidelines for Toll Roads (2007), will be applied. The relevant Performance Standards, and where they are addressed in the ESIA, are shown in Table 2-7 in the ESIA.

The IFC and regional development banks have well established ESIA procedures which apply to their lending activities and projects undertaken by borrowing countries. Although their operational policies and requirements vary in certain aspects, they follow standardized procedures for the preparation and approval of ESIA reports.

The IFC's PSs are considered the most comprehensive standards available to international finance institutions working with the private sector. The PSs define a project's role and responsibilities for managing health, safety, environmental, and community issues to receive and retain IFC and/or Equator Principle Financial Institution (EPFI) lender support.

2.3.2. IFC EHS Guidelines

IFC's EHS Guidelines will also be considered for the Project. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities at reasonable costs by existing technology. The applicability of the EHS Guidelines may need to be established for each project based on the results of an environmental, health, safety and social assessment where site-specific variables, such as host country context, assimilative capacity of the environment, and consideration of other project factors. The applicability of specific technical recommendations should be based on the professional opinion of qualified and experienced persons.

The EHS Guidelines are technical reference documents and provide relevant industry background and technical information. This information supports actions aimed at avoiding, minimizing, and controlling environmental, health, and safety impacts during the construction, operation, and decommissioning phases of a project or facility. The General EHS Guidelines are organized to capture common themes which are applicable to any industry sector and project. The General EHS Guidelines and the Industry Sector EHS Guidelines are designed to be used jointly and include:

- Environmental Health and Safety Guidelines for Wind Energy (2015).
- Environmental Health and Safety Guidelines for Toll Roads (2007).
- Environmental Health and Safety Guidelines for Electric Power Transmission and Distribution (2007).

2.3.3. EIB Environmental and Social Standards

As the long-term financing body of the European Union (EU), the EIB promotes EU policies through its financial and other support to sustainable investment projects. The increasing prominence given to environmental and social considerations within the EU and throughout the other regions of operation of the Bank is reflected in its priority lending objectives as well as in the regular review and revision of its environmental and social requirements and operational practices. The relevant ESSs, and where they are addressed in the ESIA, are shown in Table 2-10 in the ESIA.

The Environmental and Social Standards (ESSs) of the EIB, as well as the operational practices of the EIB, derive from and reflect the evolving EU approach and that of other international institutions towards the promotion of environmental sustainability and social well-being, in the broader context of the goal of sustainable development.

2.3.4. IFC and EIB Standards for Stakeholder Engagement and Public Participation

The Project follows the IFC and EIB standards for public participation. More specifically, the Project is governed by the following:

IFC PS 1, which calls upon the following recommendations for stakeholder engagement:

- Stakeholder Engagement as an on-going process that may involve: stakeholder analysis & planning, disclosure and dissemination of information, consultation & participation, grievance mechanism, and on-going reporting to local communities directly affected by the project (the Affected Communities).

- A Stakeholder Engagement Plan (SEP) must be developed and implemented that is scaled to the Project risks and impacts and development stage, and to 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.
- 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.

The Project is also governed by EIB ESS 10, recognizing the importance of open and transparent engagement with Project stakeholders as an essential element of good international practice:

- Establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in Project design and environmental and social performance.
- Promote and provide means for effective and inclusive engagement with Project-affected parties throughout the Project life cycle on issues that could potentially affect them.
- Ensure that appropriate Project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.

2.4. Lebanon Wind Power Project Policies

Lebanon Wind Power has developed and implemented the following project social polices:

- Stakeholder Engagement Policy, refer to **Appendix C** to this SEP.
- Human Resources Policy, refer to **Appendix B** to the ESMP.
- Recruitment and Selection Policy, refer to **Appendix C** to the ESMP.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The Project has been identifying potential stakeholders since March 2017. Project stakeholders and key informants were identified by the Developer and team based on the following: 1) categories of population usually affected by similar projects; 2) specific knowledge of the governance and social structure in the Project area; and 3) preliminary discussions with the MOE and their recommendations.

The Project has a wide range of stakeholders ranging from national and regional government institutions, in addition to communities within the area of influence of the Project. As such stakeholders have been identified at all geographic levels, including national, regional and local levels.

The three principal categories of stakeholders are as follows:

- National governmental institutions, including the MOE, MOEW, MOPWT, MOIM and other bodies involved in the permitting and ESIA process; and governmental authorities at the regional level, including the Governorate level (Governors) and District level (Kaemmakam).
- Affected Communities, defined as the local community as well as other people directly affected by the Project and/or those who have been identified as most vulnerable to change and who need to be engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

  Specifically, within the affected communities, vulnerable groups must be identified. Vulnerable groups include those expected to be disproportionally affected by the Project, and therefore require special consideration throughout the consultation process. 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 and included the following:

  - Women: due to cultural norms in Lebanon (and specifically within the context and setting of the Project area), the participation of women in the decision-making process is limited which could result in overlooking any specific concerns they might have.
  - Elderly: due to civil status and diminishing mental capacity, this could limit their participation in the decision-making process which could result in overlooking any specific concerns they might have.
  - Informal settlements and Syrian and Palestinian refugees in Lebanon in general, and in Akkar in particular: people that have fled from their home to seek safety in Lebanon, many of whom are excluded from key facets of social, political and economic life. As they face restrictions on legal status and human rights, this could limit their participation in the decision-making process which could result in overlooking any specific concerns they might have.
- Other Interested Parties, defined as people and organizations that are interested in the Project and/or could affect the Project in some way. Those generally include universities and non-governmental organizations as follows:

  - Universities and research centers, such as the Lebanese Agriculture Research Center (LARI), the Lebanese University and the University of Balamand.
  - A national NGO (MADA) is also active in the region, including the Project area.

3.1. Affected Communities

The affected communities have been identified based on: 1) detailed understanding of the Project site location, its nature, administrative setup and the nearby surrounding receptors; and 2) the nature of the anticipated impacts from the Project throughout its various phases. Based on the above, the affected communities include the local communities of the Project area (including women and the elderly) and informal settlements. As discussed earlier, the Project site is located within Akkar Governorate and specifically within Akkar District. The communities that are likely to be affected by the Project development logically include those located within the vicinity of the Project site, and which are therefore anticipated to be impacted the most from the Project's activities (during construction, operation and decommissioning). This in turn was determined based on the detailed understanding of the nature and extent of the Project's impacts. The main anticipated impacts which could affect the nearby communities (as discussed in further detail in each of the relevant sections) are described in the following sections.

3.1.1. Direct Area of Influence (DAOI)

The DAOI was considered to include the following:

- Land lease and acquisition for the Project, as well as new segments of asphalt road and track through Hawa Akkar and Sustainable Akkar wind farms to access the Project.
- Community health, safety and security impacts from the Project development including:
  - Noise impacts generated by the operating turbines.
  - Shadow flicker generated from the operating turbines.
  - Visual impacts from the presence of turbines
- Socio-economic conditions (including land use access) from such a development.

Therefore, affected communities in the DAOI were determined to include:

Land leased/acquired for the Project:

1. Fnaidek.
2. Karm Chbat.
3. Rweimeh Village.

Land leased/acquired for new segments of track through Hawa Akkar:

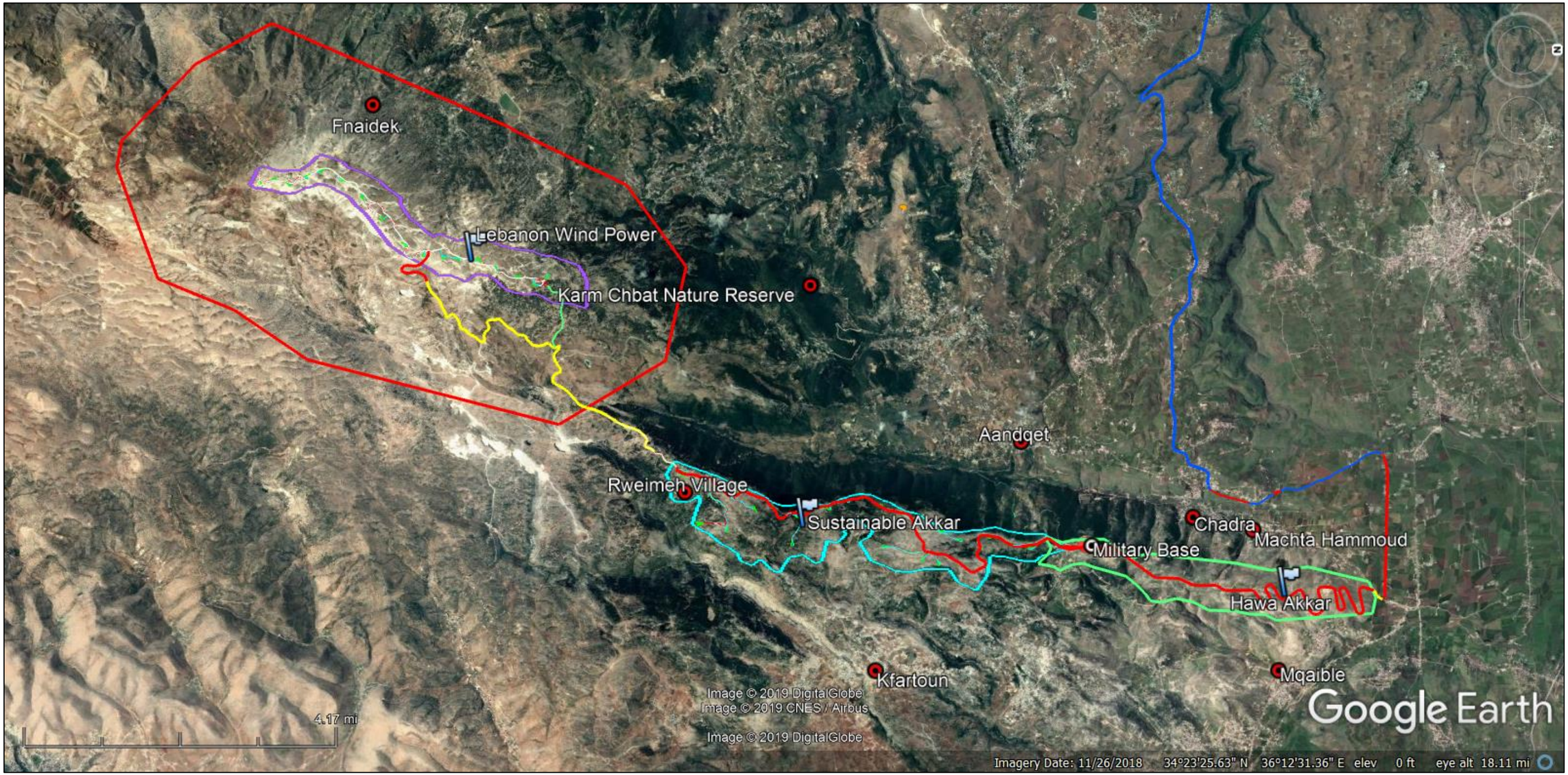
4. Chadra.
5. Machta Hammoud.
6. Mqaible.

Land leased/acquired for new segments of track through Sustainable Akkar:

7. Rweimeh Village.
8. Aandqet.
9. Jabal Akroum-Kfartoun.

Villages in the DAOI are shown in **Figure 3-1**. In addition to these communities, individual noise, shadow flicker and visual receptors within 3km of the Project were considered (refer to **Section 17 of the ESIA**).

Figure 3-1 Villages in the Project Direct Area of Influence



3.1.2. Indirect Area of Influence (IAOI)

The IAOI was considered to include the following:

- The existing asphalt transport route.
- The wider environment which extends up to 15km from the Project footprint to include sites and monuments of national importance potentially affected by the Project's visual impact.

Therefore, affected communities in the IAOI include those local communities along the existing asphalt transport route, as shown in **Figure 3-2a** through **Figure 3-2g**, and include the following:

- Tripoli.
- Beddaoui.
- Deir Amar.
- Borj El-Yahoudiyé.
- Nabi Youcheaa.
- Minie.
- Zouq Bhannine.
- Al Mhamra.
- Bebnine.
- Qoubber Chamra
- Mqaiteaa
- Borj El-Yahoudiyé
- Kfar Melki Aakkar.
- Rmoul.
- Qaabrine.
- Sammouniyé.
- Tall Aabbas El-Gharbi.
- Hissa.
- Tall Aabbas Ech-Charqi.
- Tall Hmaire.
- Chir Hmairine.
- Hokr Jouret Srar.
- Iitige.
- Barcha.
- Kharmoubet Akkar.
- Janine
- Qachlaq.
- Aamaret El-Baykat.
- Noura Et-Tahta.
- Kouachra.
- Dibbabiye.
- Fraidis.
- Qsair Akkar.
- Menjez.
- Rmah.
- Chikhlar.
- Aaouaainat Aakkar.
- Mashta Hassan.

Figure 3-2a Villages Consulted Along the WTG Transport Corridor and Villages Near the Project

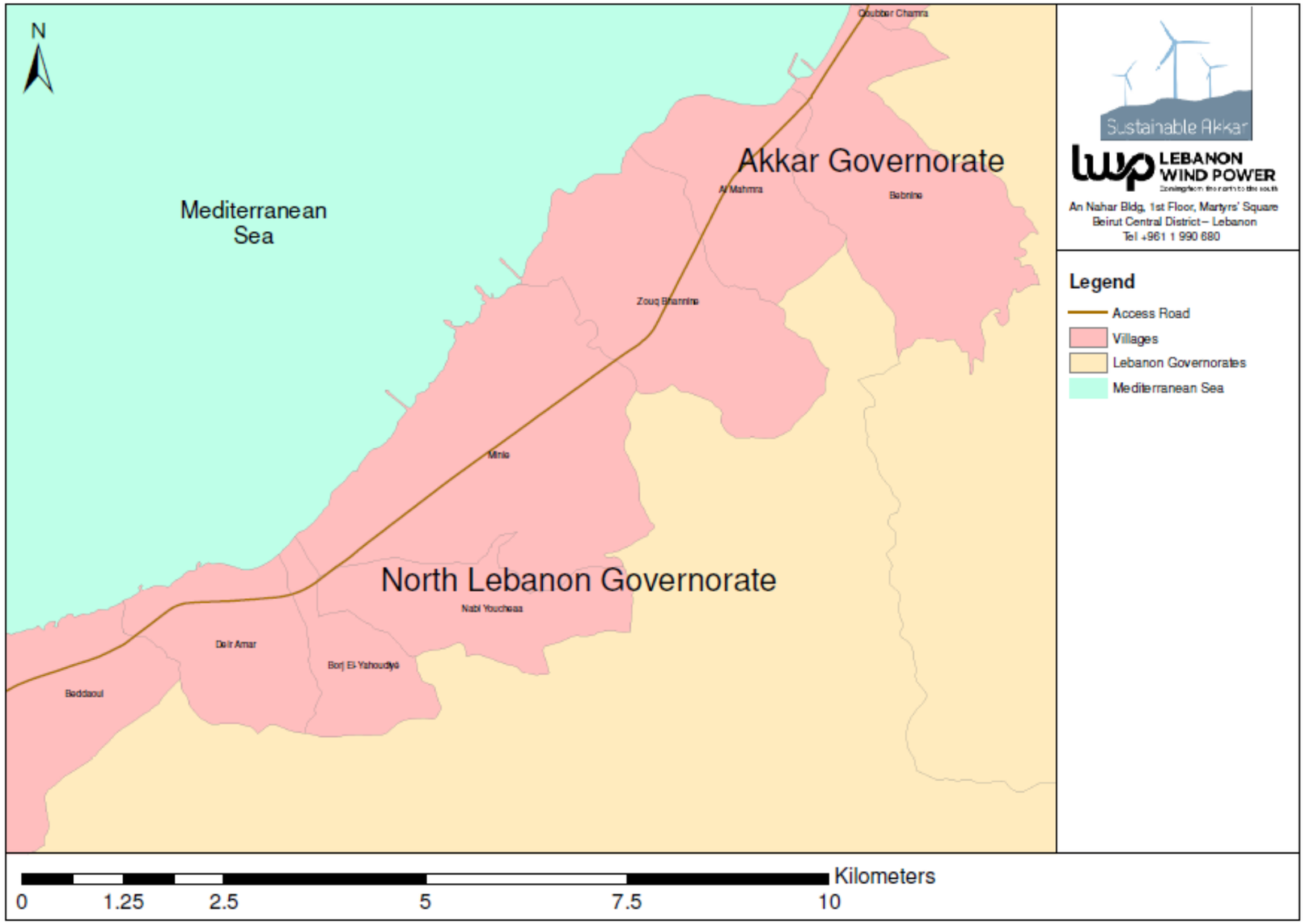


Figure 3-2b Villages Consulted Along the WTG Transport Corridor and Villages Near the Project

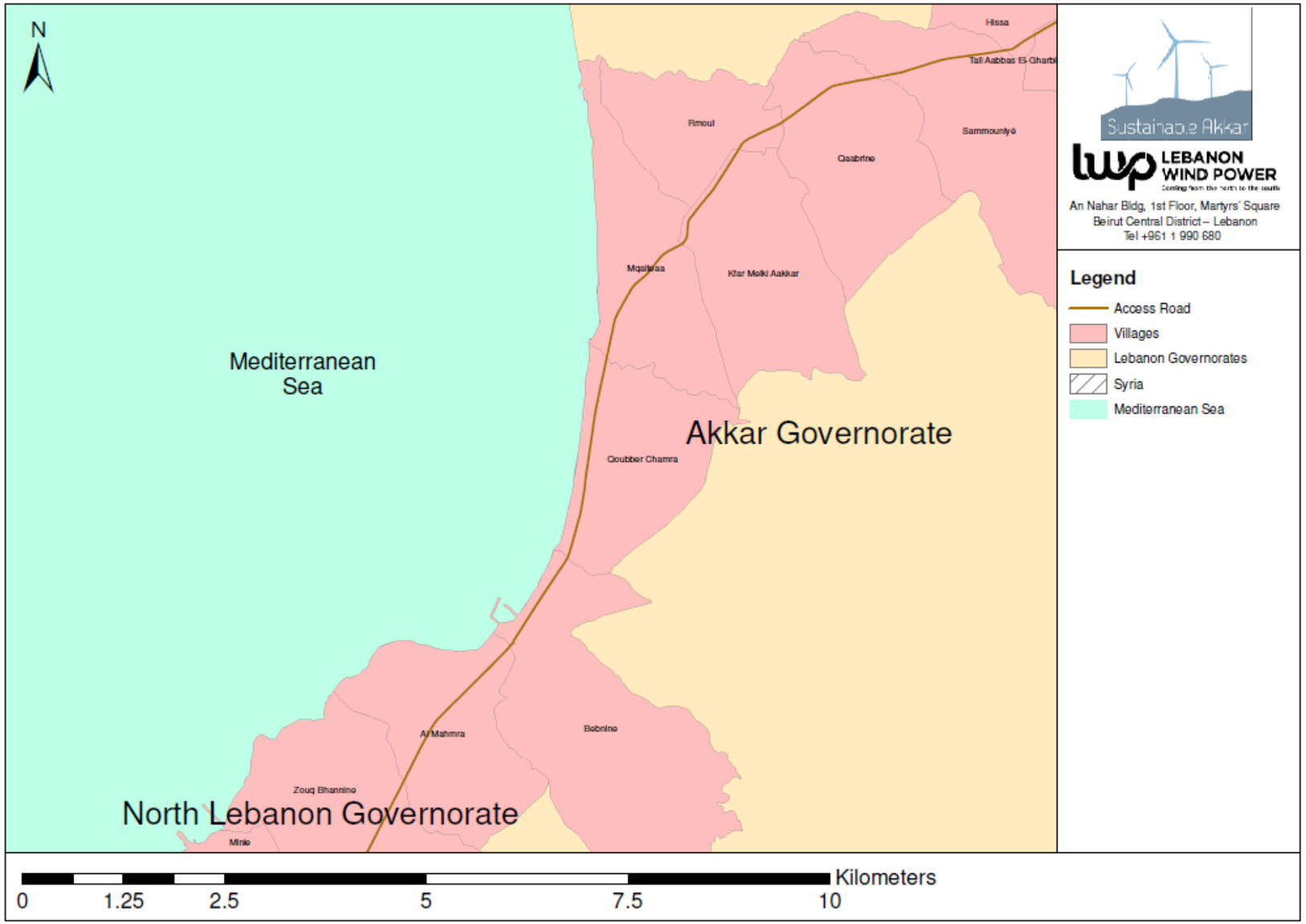


Figure 3-2c Villages Consulted Along the WTG Transport Corridor and Villages Near the Project

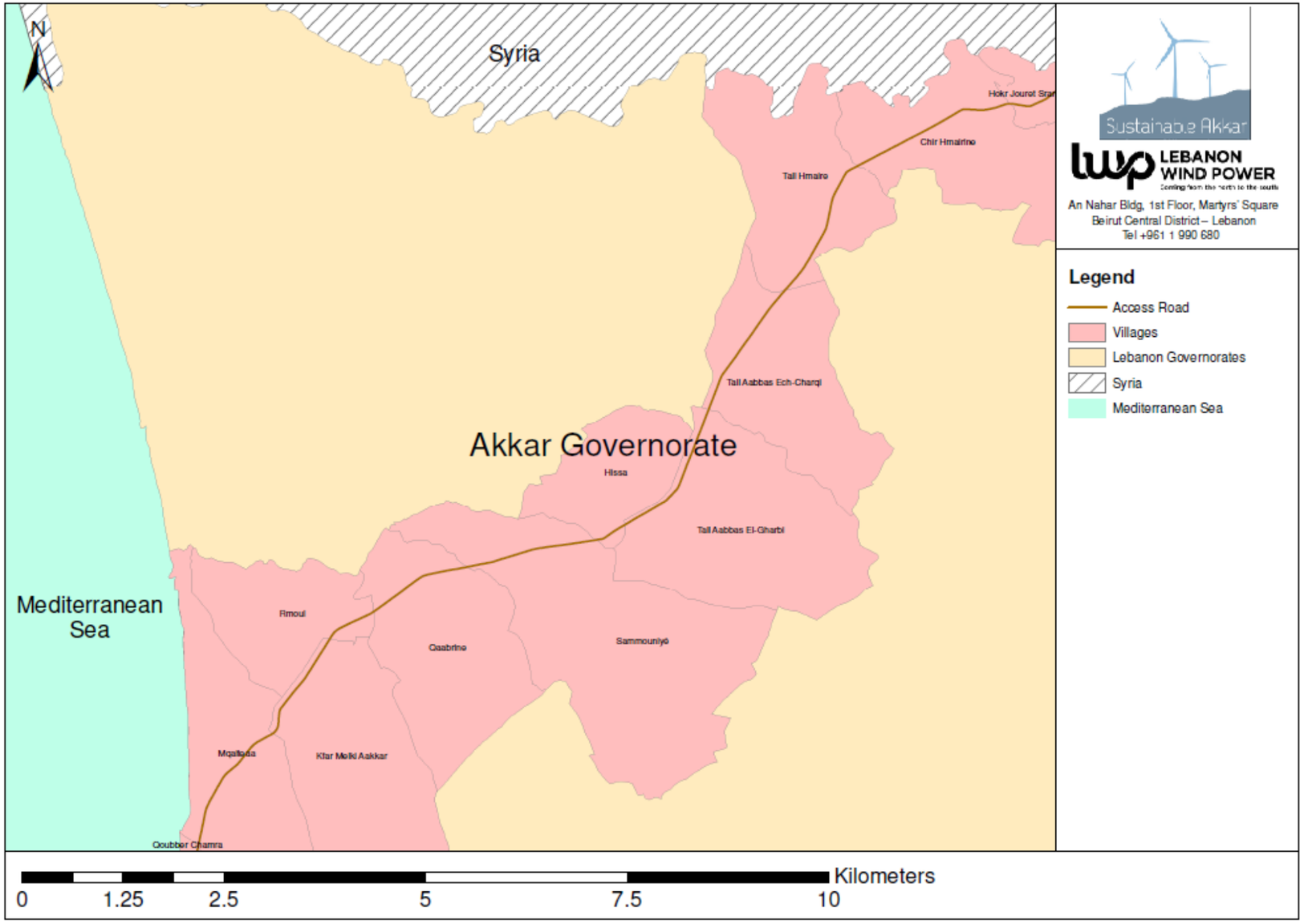


Figure 3-2d Villages Consulted Along the WTG Transport Corridor and Villages Near the Project

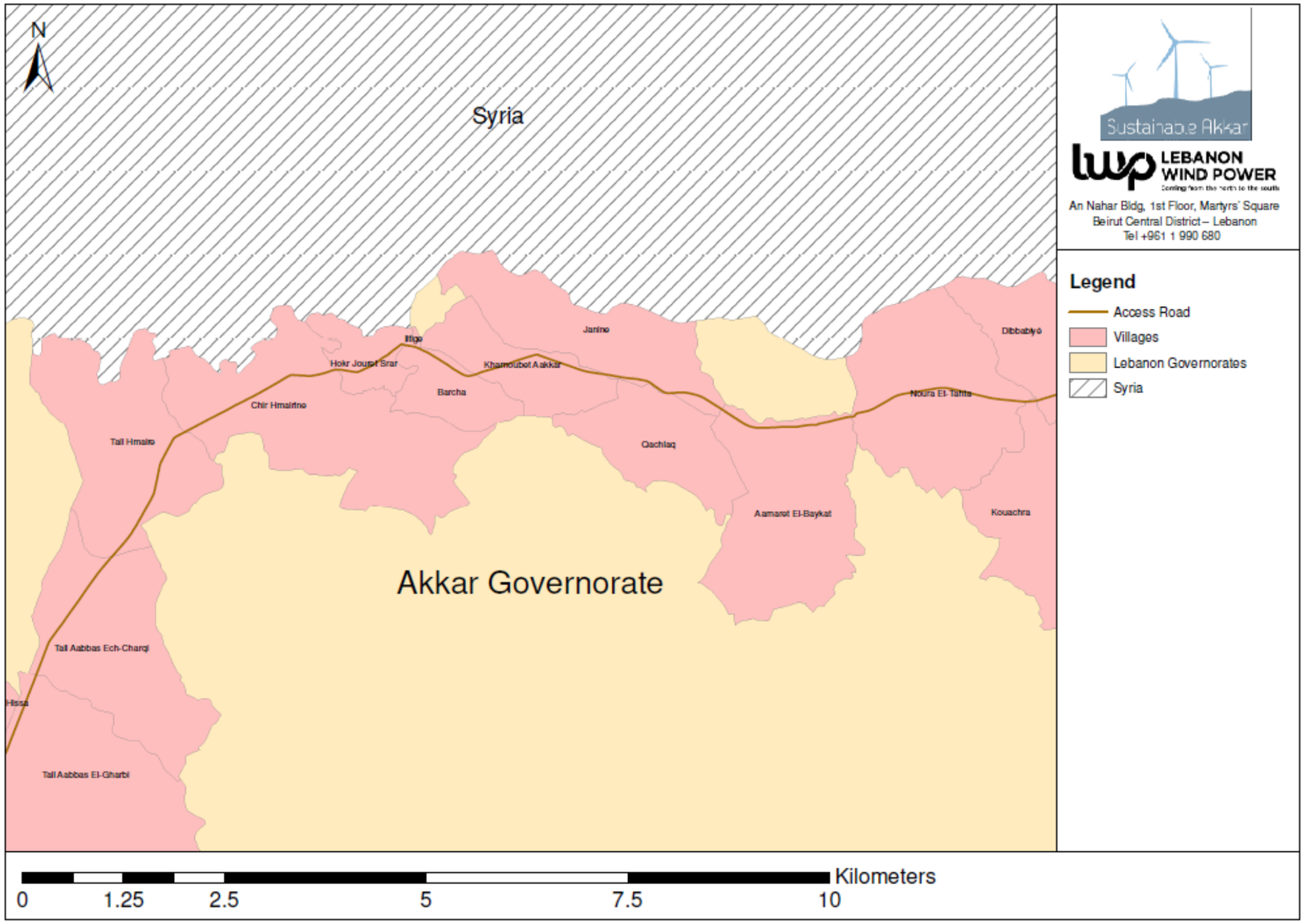


Figure 3-2e Villages Consulted Along the WTG Transport Corridor and Villages Near the Project

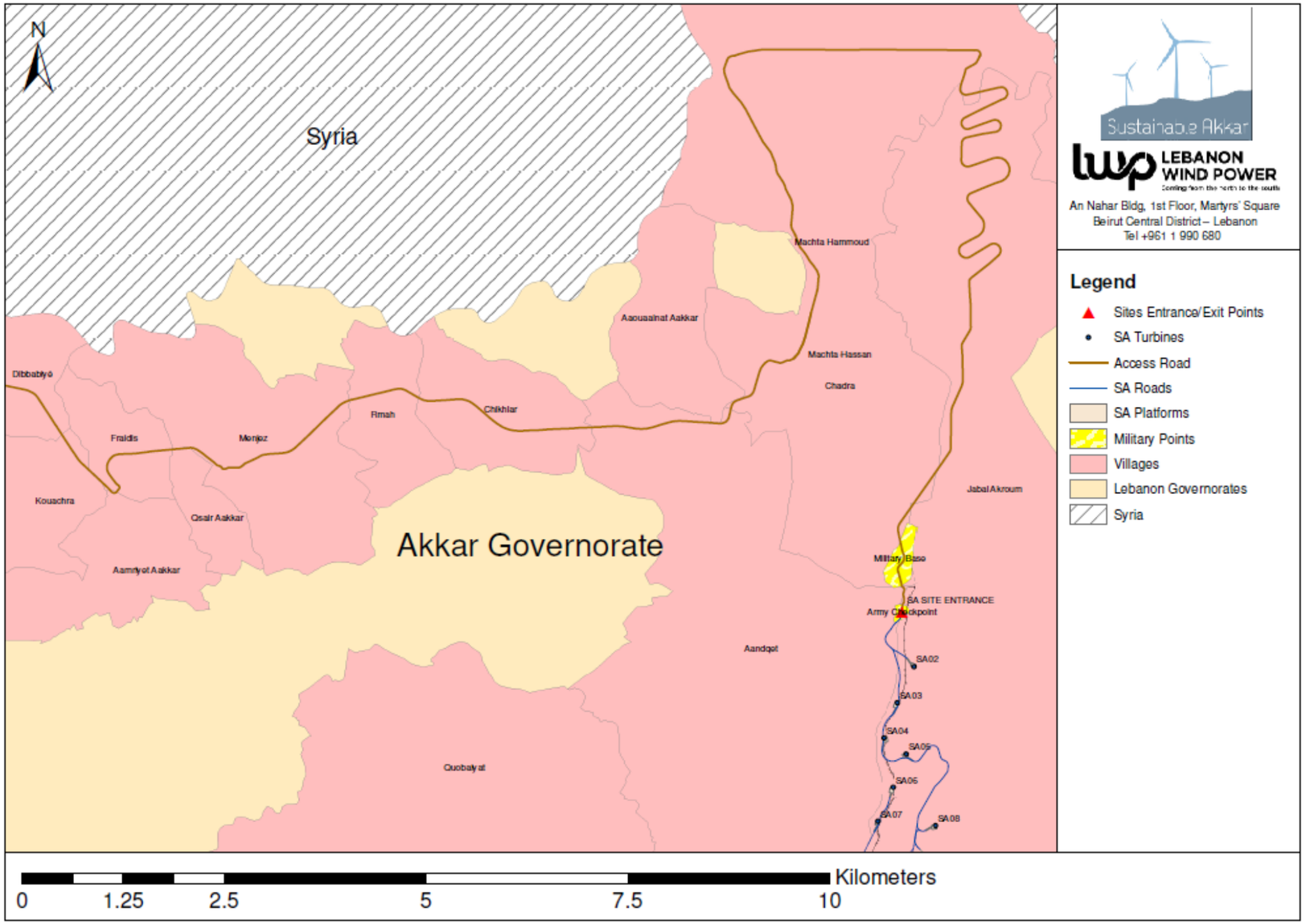


Figure 3-2f Villages Consulted Along the WTG Transport Corridor and Villages Near the Project

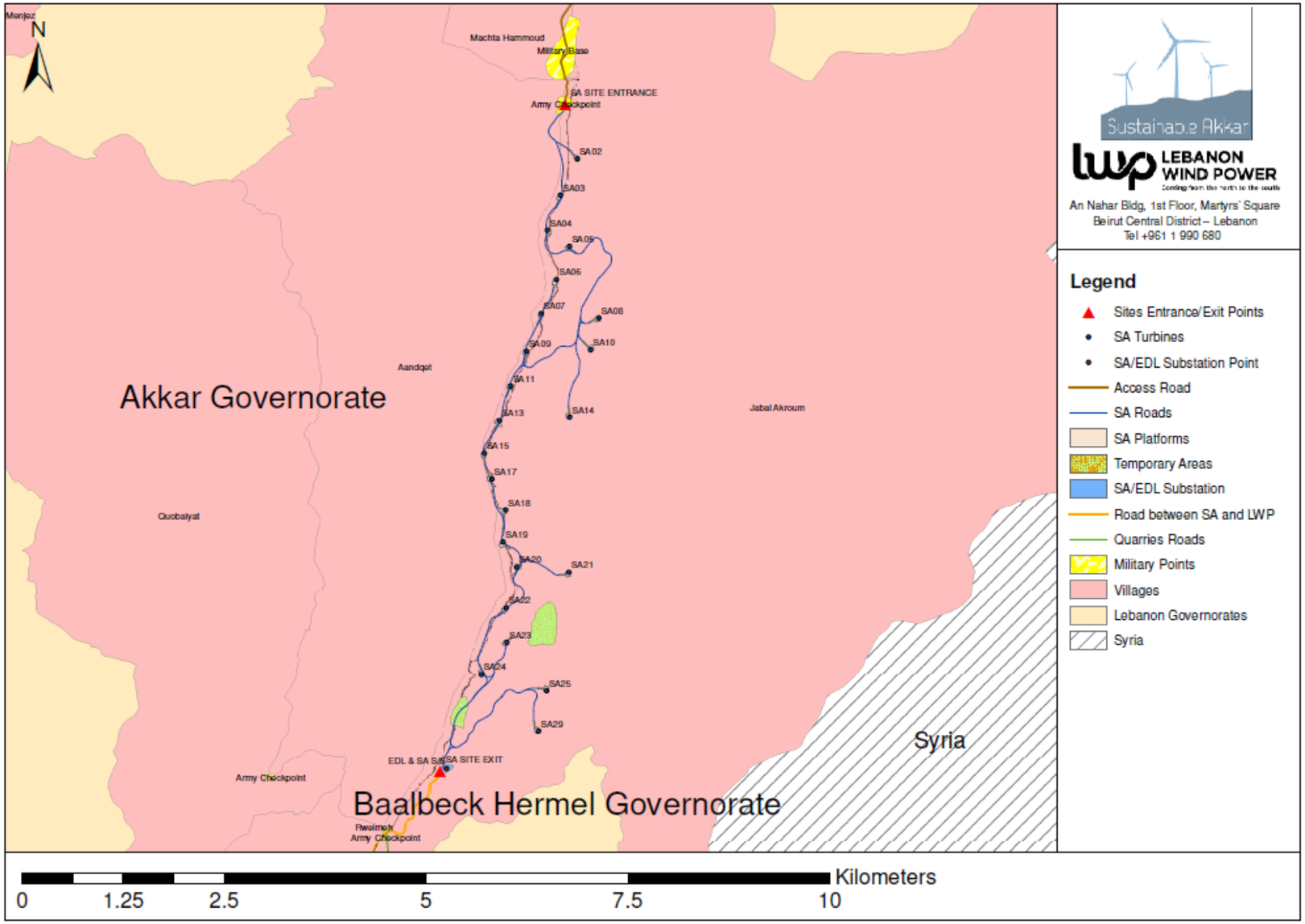
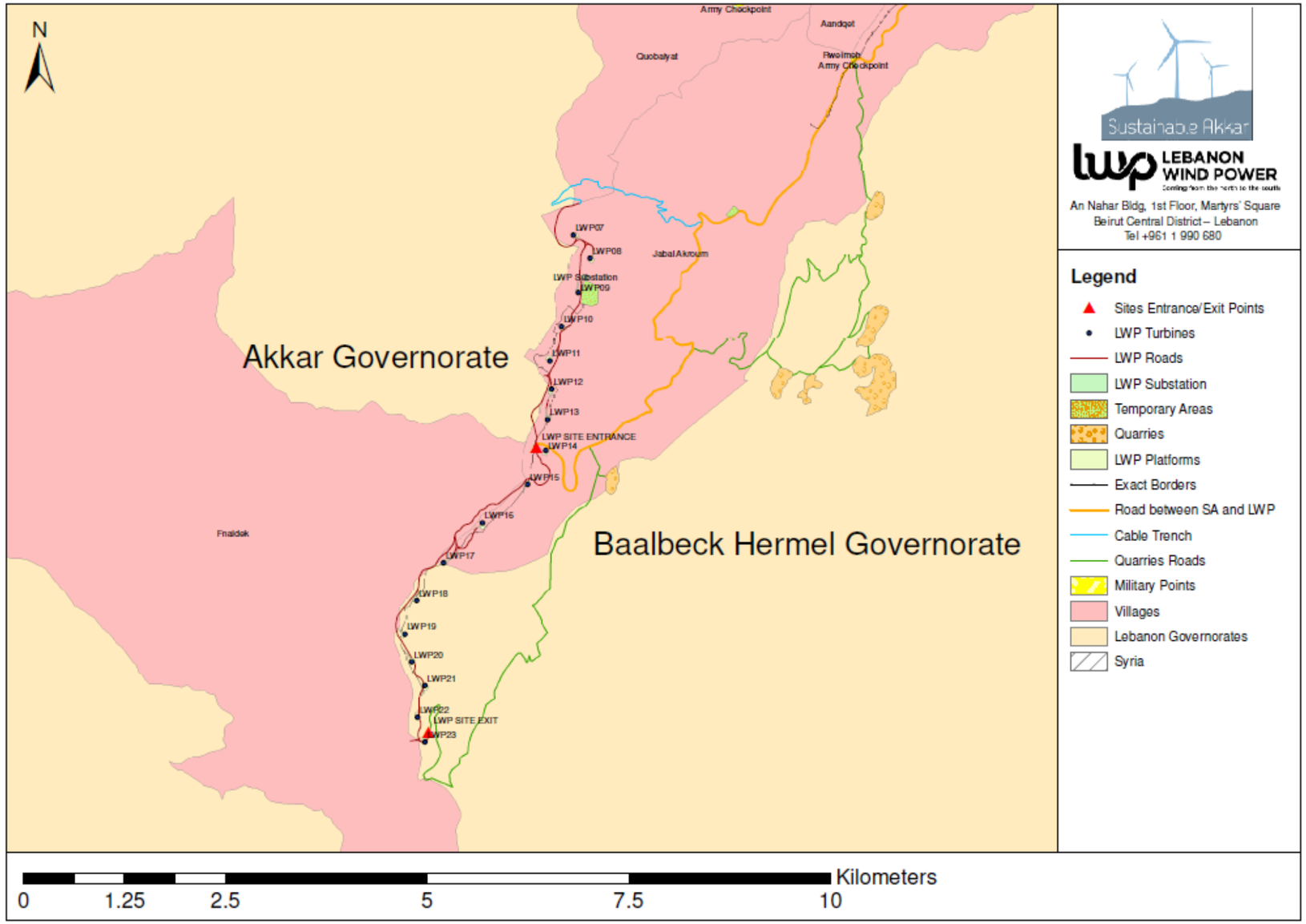


Figure 3-2g Villages Consulted Along the WTG Transport Corridor and Villages Near the Project



4. INITIAL STAKEHOLDER ENGAGEMENT PLAN

Public participation ensures that the concerns of all stakeholders are clearly documented and thus addressed as part of the decision-making process of the Project. The purpose of this section is to demonstrate how public participation has been undertaken since the Project was conceived, throughout the ESIA process, and how it will be sustained throughout the different phases of the Project through the implementation of the ESMP. Public participation and engagement are integral to the ESIA process and a pre-requisite of the national EIA regulations in Lebanon as well as the international standards followed by the Project.

Villages consulted along the WTG transportation route and closest to the Project site were shown in **Figures 3-2a through 3-2g** (Note: the WTGs for Lebanon Wind Power, Sustainable Akkar and Hawa Akkar are depicted as white paths in this figure for clarity). Public participation activities have been undertaken from 2011 to the present; and the public participation activities undertaken from 2017 to date are summarized below.

4.1. Summary of Previous Stakeholder Engagement Activities

The following sections describe the stakeholder engagement activities undertaken from 2017 to date. It is recognized that public participation is an on-going and continuous process, undertaken throughout all Project phases, inclusive of construction, operation and decommissioning.

4.1.1. 2017 Activities

4.1.1.1. Identification of Stakeholders and Key Informants

Project stakeholders and Key Informants were identified by the Project Proponent and team based on the following: 1) categories of population usually affected by similar projects; 2) specific knowledge of the governance and social structure in the Project area; and 3) preliminary discussions with the MOE and their recommendations.

4.1.1.2. Engagement with Family Leadership in Affected Communities

The Project developer began early engagement with family leadership of the Affected Communities in advance of the ESIA activities, as shown in **Table 4-1**. It is noted that, as the LWP and Sustainable Akkar Wind Farms are adjacent, engagement was undertaken to support the planned development of both wind farms.

Table 4-1 Face-To-Face Meetings with Family Leadership in Affected Communities

Name	Village Represented	Date
Abbas Jaafar, Kamel Jaafar, Mohamad Jaafar and Abdo Jaafar	Karm Chbat	2-Mar-17
Hussein Jaafar, Youssef Jaafar	Rweimeh	8-Mar-17
Hussein Ahmad Salah, Mohamad Ali Salah and Hussein Ali Salah	Kfartoun	27-Mar-17
Mohamad Khaled Abed Al Rahman and Ahmad Abed Al Rahman	Kfartoun	4-Apr-17
Mohamad Hussein Hussein and Khaled Mohamad Hussein	Kfartoun	18-Apr-17
Ahmad Ali Youssef Salah, Hasan Hasan Salah and Adnan Ali Salah	Kfartoun	9-May-17
Moustafa Hada	Kfartoun	9-May-17
Richdi Khaled Al Adraa, Hani Khaled Al Adraa and Mohamad Khaled Al Adraa	Kfartoun	24-May-17
Ahamad Ahmad Al Adraa and Hani Al Adraa	Kfartoun	6-Jun-17
Hani Al Adraa	Kfartoun	12-Jul-17
Ahmad Ali Daher	Kfartoun	12-Jul-17
Ahmad Abou Amcha, Hasan Khoder Abou Amcha and Mouhamad Hasan Abou Amcha	Kfartoun	14-Aug-17
Khaled Hasan Khoder	Kfartoun	1-Sep-17
Ali Jaafar, Toaan Jaafar and Noura Jaafar	Karem Chbat	11-Sep-17
Khoder Hussein Melhem, Urki Hussein Melhem and Jamil Hussein Melhem	Kfartoun	7-Oct-17
Hassan Jaafar, Ahmad Jaafar and Medhit Jaafar	Rweimeh	9-Oct-17
Riyad Jaafar, Imad Jaafar and Mohamad Jaafar, Ali Jaafar and Ajaj Jaafar and Rached Jaafar	Rweimeh	16-Nov-17
Maher Chawki Al Adraa, Ahmad Hasan Al Adraa and Ahmad Moustafa Al Adraa	Kfartoun	13-Mar-18

4.1.2. 2018 Activities

4.1.2.1. Meetings with Key Informants

Meetings were organized with key informants to discuss their opinions regarding the Project and to describe the household survey campaign to be implemented, as shown in **Table 4-2**.

Table 4-2 Meetings with Key Informants

Name	Role	Number	Date	Meeting Type
Ahmad Baarini	Mayor of Fnaidek	03387640	20-7-2018	Face-To-Face Phone Call
Omar Zahraman	Electrical Engineer at EDL	03187197	20-7-2018	Face-To-Face
Mohamad Salaheldin	Municipal Official Fnaidek	03574071	20-7-2018	Face-To-Face
Samira Tannous	Mayor Secretary Qobaiyat	71856582	25-7-2018	Face-To-Face Phone Call
Abdo Adbo	Mayor Qobaiyat	71856582	25-7-2018	Face-To-Face Phone Call
Ahmad Omar	Association for Development of Akkar	70632313	6-8-2018	Face–To-Face
Farah Sankary	Akkar Network for Development	76409270	6-8-2018	Face–To-Face
Dr Antoine Daher	Environmental Council	03216888	11-8-2018 20-10-2018	Phone Call Face-To-Face
Abdo Jaafar	Focal Point of Rweimeh Village	70677087	28-9-2018	Phone Call

District level data regarding demographics, sources of income and cultural aspects was obtained during the meetings.

4.1.2.2. Household Surveys

A household survey campaign was implemented to: 1) support the collection of social demographic data; 2) understand access to energy, consumption, and how the lack of a reliable energy supply may affect livelihoods; 3) attitudes of the local population (households and small to medium enterprises (SMEs)) toward the Project and expectations around better energy supply. The household survey targeted the surrounding villages of Qobaiyat, Fnaidek and Rweimeh Village. The targeted groups were village households and included interviews with the mayors of Qobaiyat and Fnaidek and SMEs operating in the villages.

Quantitative and qualitative information was collated through primary data collection and analysis and reflection on the perceptions conveyed by the various residents pertaining to the Project and the current energy situation. Specifically, the survey focused on the following three information categories:

1. Social: The collection of social demographic data, including population, age, size of household, number of children, social composition, unemployment, employment by sector, distribution of labor force, income levels, house ownership, seasonal residency, population health profile and access to basic services.
2. Economics: The collection of data to assess household and SME energy consumption and expenditure, the background of each active business operating in each village, the nature of the supply of energy and current challenges associated with purchase a distribution of energy by subscribing to generators, the costs and burdens of energy and how it impacts the region and

livelihoods, and how the economic situation in the villages will be affected by better energy supply, i.e. stimulation of the micro economy.

The survey was designed to reflect the actual energy supply situation through a series of qualitative and quantitative questions covering many areas of the village and its socioeconomic situation. Due to lack of knowledge, certain technical questions were left unanswered by the respondents.

3. Technical and Energy Indicators: The collection of data to assess sources of energy and electricity, duration of electrification, the willingness of residents to connect and pay for electricity, household and SME's knowledge and the expectations from the Project and wind turbine technology, acceptance of this new source of energy or their indifferent feeling towards it, and lastly, what they anticipate as Project challenges.

The research team conducted a total of 408 surveys, divided between Fnaidek and Qobaiyat, with a total of 176 in Fnaidek (88 households out of a total of around 1,100 households in the village and 88 active SMEs) and 232 in Qobaiyat (180 households out of a total of 1,300 households in the village and 52 active SMEs). The total number of surveys is equivalent to 11% of the permanent households and 100% of active SMEs.

It is noted that El Rweimeh Village was not surveyed as planned, as the Project Team was advised by the local mayors and the focal point of El Rweimeh Village (Mr. Abdo Jaafar) that they must be accompanied by village leaders who were not available at the time of the visit. In addition, El Rweimeh Village does not have a permanent resident population and its houses are occupied on a seasonal basis by members of the Jaafar Family, with winter occupancy reduced to just 10% of the 120 households. As such, Mr. Jaafar provided high-level socioeconomic baseline data, including population, months that the village has its highest population, livelihoods, etc.

Mr. Jaafar has advised the Project Proponent that there are no objections to the Project by El Rweimeh Village members, the construction of the substation in El Rweimeh Village, and/or the construction of the buried transmission line along the existing asphalt road and the existing track through Karm Chbat Forest Reserve.

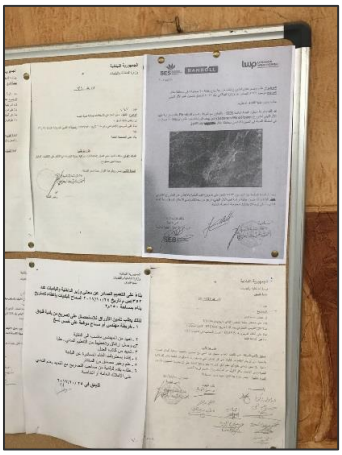
4.1.2.3. Initial Public Disclosure Meeting

The Initial Public Disclosure Meeting took place on 15 May 2018. Announcements related to the Project were prepared and filed at the municipalities of the villages which own land in the Project area, namely Qobaiyat, Fnaidek and El Rweimeh Village, and were posted on the municipal building entrance doors or information boards.

El Rweimeh Village has no municipality; therefore, the announcement was placed at Jouar El Hachich, a nearby village as per the recommendation of a representative of the local people (see **Figure 4-1a, b, c and d**).

Figure 4-1 Placement of Public Announcements

a - Qobaiyat



b - Fnaidek

c - El Rweimeh / Jouar El Hachich

d – Initial Public Disclosure Meeting

The MOE, MOIM and MOEW were also invited to the meeting through formally registered invitation letters.

Project related discussions were undertaken with the Head of the Municipality of Fnaidek and the other meeting attendants. A seminar presentation was given by SES and included a description of the proposed project, the ESIA objective and scope and a summary of the major anticipated impacts and associated mitigation measures.

The seminar was followed by a discussion whereby SES responded to the concerns raised by meeting attendants and committed to addressing them in the ESIA study. The discussions which took place during and after the meeting are summarized in Table 4-23 in the ESIA.

Figure 4-2 shows photos taken during the meeting. Overall, a positive atmosphere prevailed and was encouraged by communicating:

1. The inclusion of environmental and social management measures during all Project phases.
2. The commitment of the Project Proponent to implement the latter measures.

Figure 4-2 Photographs of the Initial Public Disclosure Meeting

Table 4-3 Summary of Discussions During/Following the Public Consultation Meeting

Remark / Concern	Response
Mr. Majid Hachem, MOIM representative, was concerned about the status of the ownership of the parcels located at the top of the mountain i.e. whether they are public / municipal or private properties. He also advised that an official survey be implemented.	Mr. Ahmad Abdo Albaarini, Head of Municipality of Fnaidek, replied that these are municipal properties. He explained that Fnaidek municipality on the west side of the mountain ridge and Al Jaafar families from the east side have agreed on the border between their respective properties. It is the line separating the water catchments on the eastern and western slopes of the ridge. Mr. Jules Assi noted that the lands for the Project are not surveyed and have no title deeds. He added with the head of municipality of Fnaidek that they are going to proceed with علم وخبرwith the help of the local head of municipalities and mayors (مخاتير) as well as a surveyor and the police, then the documents would be filed for certifying at the governorate of Akkar.
Mr. Majid Hachem noted that SES will be looking at the impact of the wind farm on the existing facilities without considering the depreciated value of surrounding land.	Dr. Abi Esber replied that there are 24 potential locations for the turbines and the latter will be compared to select the ones which will have the least adverse impact on the surroundings all while considering electricity production potential in the assessment; once selected the land(s) which will be leased for the turbines span up to 3,500m^2 around the turbine which increase the compensation potential for land owners. She finally added that the fact that most of the lands are publicly owned decreases the significance of the depreciation impact and make this area particularly attractive for the proposed development.
Mr. Jeff Gerges recommended that SES take into consideration the obligations of Lebanon under the international conventions (CBD and AEWA). He also added that the significance of the impact in terms of bird casualties needs to be evaluated in comparison to international guidelines which are available in this respect. He also enquired about the radar's mechanism and whether it can automatically shut down the relevant turbine	Dr. Abi Esber ascertained that all relevant signed / ratified conventions will be considered. With respect to bird casualties, Dr. Abi-Esber explained that Dr. Jaradi, who is the Project's avifauna expert, is training the ESIA project team on the identification of birds in the study area, which is instrumental for the implementation of monitoring activities during operation; the latter would identify any important bird casualties evidently taking into account the relevant international guidelines. Mr. Jules Assi replied that the radar will detect the birds' presence and flyways and based on the latter info, it will be determined when to shut off the turbines. Fast internet communication will be established between radar, the management team and the operation team (including representatives of the international turbine supplier) so that the command to shut off the turbine is quickly executed. A decision was made by the Lebanese Government to favor the shut-down of the turbines during migration periods. The decision stipulates that the Lebanese government will cover the financial losses from the shut off of turbines during migration periods in order to protect important migrating birds. Mr. Ahmad Abdo Al Baarini added that birds in the area commonly fly on the sides of the mountains, not on the top which is very high, and this should minimize any adverse impacts to birds.
Mr. Majid Hachem enquired about the number of turbines and the total production capacity.	Dr. Abi Esber replied that based on the final layout of favorable locations, the number and size of turbines will be decided; only large turbines will be used (3.8MW-5MW) to minimize the environmental footprint.
Mr. Majid Hachem asked whether it is possible to disclose free of charge the meteorological data collected by the met masts.	Dr. Abi Esber replied that the data are the property of the Project proponent and that access to data needs to be negotiated with them. Mr. Jules Assi added that not all types of meteorological data are collected, only those relevant for turbine operation, i.e. wind speed and direction, pressure temperature and humidity. Other essential meteorological data like rainfall and cloud cover are not being collected.
Mr. Jeff Gerges asked for more information regarding the de-icing mechanism of turbines.	Mr. Jules Assi mentioned that turbines which are located in snowy areas will be equipped with a de-icing mechanism which is more expensive but can ensure sound operation during snowy periods. Mr. Bachir El Marj said that the technology resembles that used in airplanes.
Ms. Nathalie Karam stressed that the ESIA study under preparation needs to consider the following: • SEA for the renewable energy sector. • The letter sent from MOE to MOEW concerning the scope of the ESIA of the three wind farms. • An assessment of bats in addition to birds. • An assessment of floral species in the area indicating those with high ecological value. • The decommissioning phase. • The extended producer responsibility concept to be included in contracts with turbine suppliers in case of broken parts.	Dr. Abi Esber replied that the preliminary studies done by Dr. Jaradi, the Project bird expert, has shown that there are no bats. She added that a complete site survey will be conducted where all kinds of fauna and flora will be recorded; the survey will be done when the layout of proposed sites is finalized. Mr. Jules Assi assured that any defect or broken items will be the responsibility of the operating company.
Mr. Jules Assi asked Ms. Nathalie Karam whether the Ministry would mind if the three ESIA consultants involved in the ESIA studies of the three proposed wind farms undertake a single cumulative impact study to avoid redundant efforts.	Ms. Nathalie Karam ascertained that this is not a problem as long as findings from the cumulative study are reported within the three ESIA studies.

4.1.2.4. Site Visit by LCEC/Family Leader Meeting

A Site Visit was undertaken on 4 June 2018, to provide LCEC with an overview of the Project site, potential turbine locations and the substation location, as shown in **Figure 4-3**. The site visit was followed by a meeting with the focal point of El Rweimeh Village (Abdo Jaafar), General Daher and the Aandqet Municipality Mayor.

Figure 4-3 Site Meeting with LCEC

4.1.2.5. Iftar for Affected Communities

A public participation dinner was prepared on Ramadan (7 June 2018) for several of the Affected Communities, including Akroum, Kfartoun and Rweimeh Village, as shown in **Figure 4-4**. The dinner was held to provide a better understanding of the Project design execution and the implications on the surrounding environment. Iftar is one of the religious observances of Ramadan and is often done as a community, with people gathering to break their fast together.

4.1.2.6. Land Rental/Ownership Impact Meetings with Officials

Discussions were undertaken with officials regarding land rentals and potential ownership impacts from turbines such as noise, shadow flicker and visual amenity as follows:

- 20 July 2018 - Meeting with Mayor of Fnaidek Ahmad Baarini.
- 20 July 2018 - Meeting with Municipal official Fnaidek Mohamad Aalah El Din.
- 25 July 2018 - Meeting with Mayor Secretary of Quobayat Samira Tannous.

Discussions included what job opportunities would be created by the Project, along with the general terms of the rental contract.

Figure 4-4 Iftar for Affected Communities

4.1.2.7. 2-Day Visit by Bank Audi/SLR

A 2-day site visit was undertaken by the Project Proponent with representatives of Bank Audi and their ESIA Reviewer, SLR, on 2 October 2018. The purpose of this visit was to provide an overview of the Project area, including the general physical environment, road development, power substation, transmission lines and operation buildings, and to discuss land ownership. In addition, meetings were held in Tripoli with the Mayor of Fnaidek, Mr. Ahmad Baarini and with Mr. Abdo Jaafar, focal point of the Jaafar Family to discuss the potential negative and positive impacts of the wind farms projects. The site visit was followed by a meal as shown in **Figure 4-5**. On the second day (3 October 2018), several meetings were undertaken to discuss the potential negative and positive impacts of the wind farms projects as shown in **Figure 4-6**:

- A meeting with the Vice-Mayor of Andaqet, Mr. Marwan Greig.
- A meeting with a local NGO, the Environment Council in Qobaiyat.
- A meeting with General Khaled El Daher and representatives of the families of Kfartoun.

4.1.2.8. 2-Day Visit by International Lenders

The purpose of this 2-day visit 8-9 October 2018 was to have an overview of the Project, the physical environment, road development, land ownership, the substation location, the underground transmission line and the location of the operation buildings, as shown in **Figure 4-7**. International lenders Bank Audi, EIB, Proparco and Finance in Motion attended the site visit. In addition, the lenders met the mayor of Andaqet, Daher Family (General Khaled El Daher), and with the family of Jaafar, where representatives from all the communities of the project were invited, as shown in **Figure 4-8**.

Figure 4-5 Day 1: 2-Day Visit by Bank Audi/SLR

Figure 4-6 Day 2: 2-Day Visit by Bank Audi/SLR

Figure 4-7 Site Visit by International Lenders

Figure 4-8 Meeting with General Daher and Representatives of the Families of Kfartoun

4.1.2.9. Site Visit by Potential OEMs

A site visit was undertaken by the Project Proponent with representatives of three of the four potential OEMs, Siemens, GE and Nordex, on 12 October 2018, as shown in **Figure 4-9**. The purpose of this visit was to provide an overview of the Project area, including the general physical environment, road development, power substation, transmission lines and operation buildings, and to discuss land ownership.

Figure 4-9 Site Visit by Potential OEMs

4.1.2.10. 2-Day Visit to Lebanon by VESTAS

A site visit was undertaken by the Project Proponent with representatives of VESTAS on 24 October 2018. The purpose of this visit was to provide an overview of the Project area, including the general physical environment, road development, power substation, transmission lines and operation buildings, and to discuss land ownership. This was followed on the same day with a meeting between the VESTAS Head of Security and Amid Daher to discuss security conditions in the Project area, the VESTAS approach to security, and VESTAS' intent to employ locals.

During the second day of the visit, the Vestas Head of Security met in Beirut with Mr. Abdo Jaafar (from the Jaafar Family) and Mr. Omar Massoud (the Mayor of Aandqet) to discuss security conditions in the Project area, the VESTAS approach to security, and VESTAS' intent to employ locals.

4.1.2.11. Focus Group Meetings

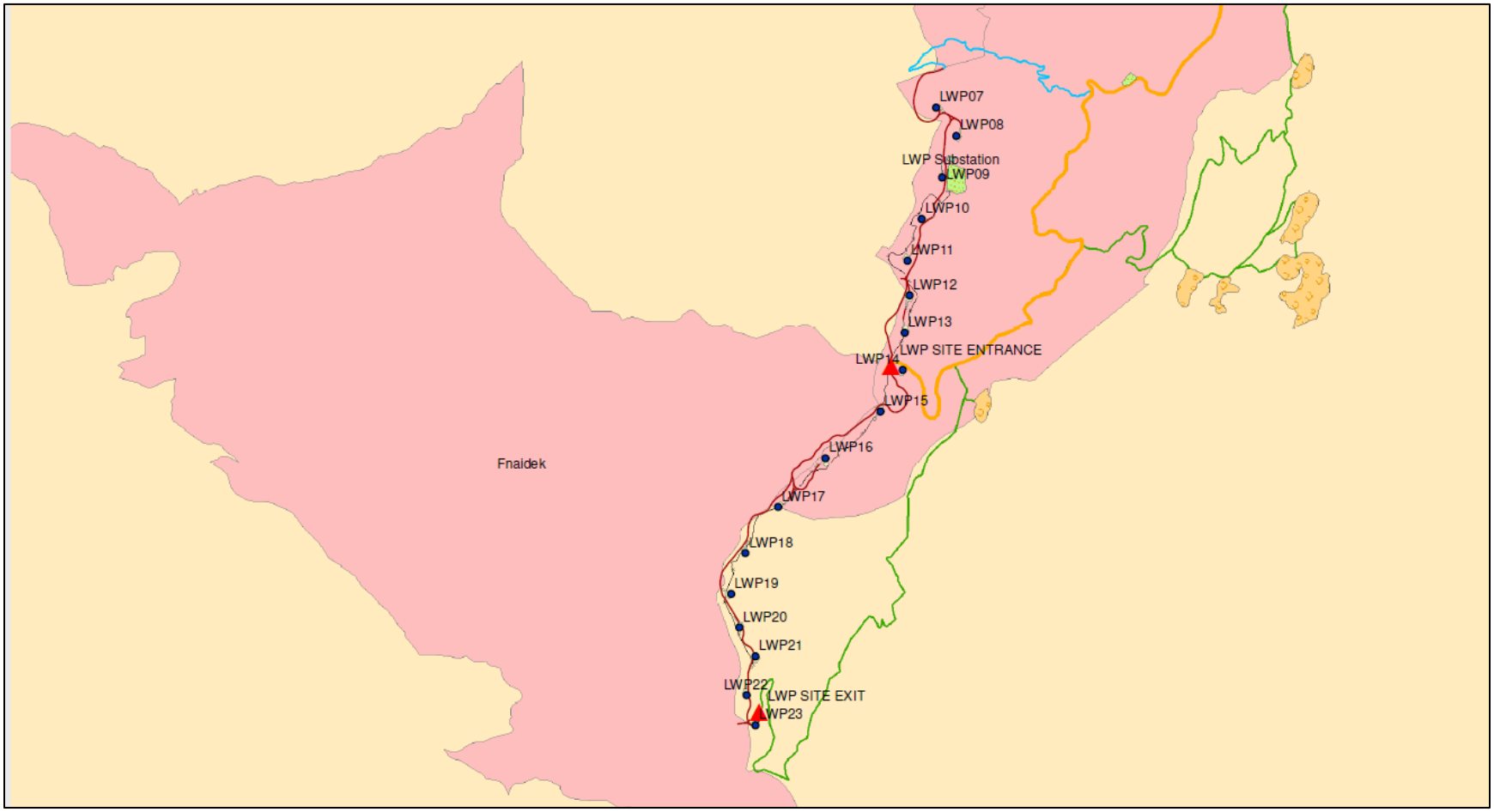
Two focus group meetings were organized on 2 and 4 November 2018, with a group of hunters who usually hunt in or in close proximity to the area where the LWP turbines will be installed and a locally active non-governmental organization (NGO), the Environment Council in Qobaiyat (مجلس البيئة - القبيات).

After introducing the Project to both groups, feedback was collected regarding their knowledge of the wind energy technology and the proposed Project. Their perceptions regarding the Project and its effects, along with the management mitigation measures that the Project Proponent will be adopting to eliminate or reduce impacts were discussed, especially potential impacts to the natural reserve adjacent to the LWP Project site. Photographs of the Focus Group Meetings are presented in **Figure 4-10**.

The hunters in attendance were specifically engaged regarding the use of one of the existing tracks used by hunters for construction of the underground transmission line between the LWP Wind Farm and the SA Wind Farm, as shown in blue in **Figure 4-11** (Note: the hunters have requested anonymity). During the meetings, the hunters were advised they would be prohibited from using this track during installation of the transmission line. The hunters advised that the track is only one of many used by hunters, and that hunting only occurs as a hobby --- not for subsistence or to support livelihoods.

Figure 4-10 Photographs of Focus Group Meetings

Figure 4-11 Existing Track through Karm Chbat Forest Reserve for Underground Transmission Line



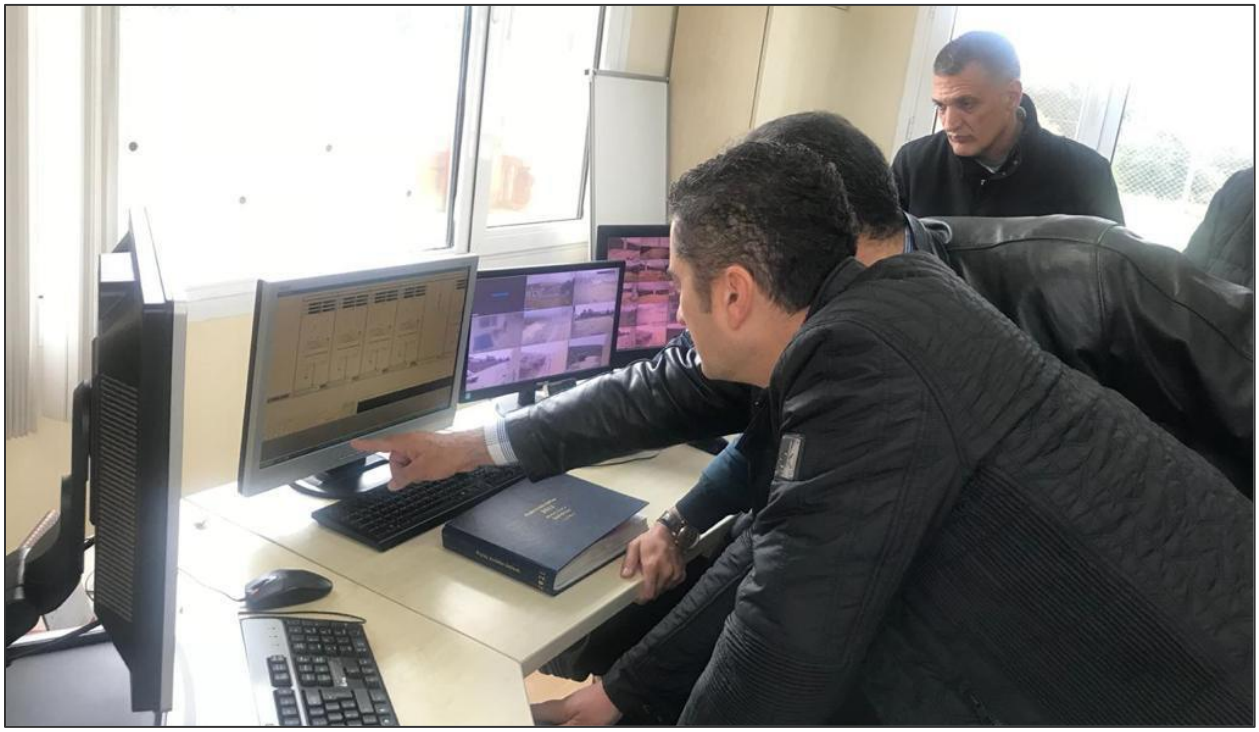
4.1.2.12. Visit to Turkish Wind Farms by Locals and EDL

A site visit to a wind farm in Turkey was undertaken on 21 November 2018, along with representatives of Sustainable Akkar, so that land owner representatives, the Mayor of Kfartoun, Ahmad el Zein, Kanaan Family representatives, Adraa Family representatives, and Daher Family representatives, could observe the operation of the wind farm and its potential negative and positive environmental effects, as shown in **Figure 4-12**.

Figure 4-12 Visit to Turkish Wind Farms

Neighbors of the Turkish wind farm were visited and consulted regarding their opinion about wind farms. On the same day, a team of seven EDL Heads of Units visited three wind farms in Turkey, along with representatives of the SA and LWP team, to discuss the challenges they may face with the operators. The Turkish wind farm operators showed them the WTG performance monitoring system and SCADA data analysis, as shown in **Figure 4-13**.

Figure 4-13 Review of WTG Performance Monitoring System and SCADA Data Analysis



4.1.2.13. November 2018 Public Meeting

Invitations to the villages were sent out 2 weeks prior to the public meeting undertaken by Hawa Akkar on 8 November 2018, in both written and oral form (i.e. with an official registered letter, or phone or personal communication/visit). The interest was low, as no one from the villages along the road corridor were noted in the attendees.

4.1.2.14. Final Public Disclosure Meeting

A final public disclosure meeting took place on 1 December 2018 at the Qammouaah Plain in Fnaidek Village. Similar to the Initial Public Disclosure Meeting, announcements related to the meeting schedule and location were prepared and filed at the municipalities of the villages which own lands in the study area and were posted on the municipal building entrance door or on information boards. Two newspaper announcements were published twice on the most read newspapers in Lebanon (An-Nahar and L'Orient Le Jour) in addition to announcement of the social media and inside the villages of Fnaidek, Rweimeh Village, Qobaiyat, and Jouar El Hachih. Announcements regarding the meeting were also published in two popular local newspapers, Annahar and L'Orient Le Jour. The MOE, MOIM and MOEW were invited to the meeting through formally registered invitation letters.

A seminar presentation was given by SES and included a description of the proposed Project and a summary of the findings of the ESIA studies, including analysis of impacts and the proposed Environmental and Social Management Plan, the general findings of the ESIA study being conducted, and actions that were taken by the developer in order to mitigate any potential negative impact of the

wind farm on the environment. The seminar was followed by a discussion whereby SES and the project developer replied to the concerns of the meeting attendants and committed to addressing them during project implementation and operation.

Overall, a positive atmosphere prevailed including lively discussions and exchange of ideas. The project developer committed to addressing all concerns and invited the attendants from the local public to apply for job opportunities offered by the project. **Table 4-4** summarizes the discussions which took place during and after the Final Public Disclosure Meeting.

Figure 4-14 shows photos taken during the meeting.

4.1.2.15. Meetings with the Fnaidek Municipality

On 6 December 2018, several meetings were held between LWP project management team and representatives of the Municipality of Fnaidek to discuss the terms of the rental contract between the two institutions. Fnaidek municipality was represented by the Mayor Mr. Ahmad Baarini, Dr. Mohamad Ali while SA/LWP was represented by Me. Adele Halabi (lawyer of SA/LWP), Mr. Jules Assi, Eng. Sarkis Farah.

The main topics discussed during the meeting included the following:

1. Duration of this contract – why the rental contract is for 23 years?

The rental contract is divided into three phases:

- Phase 1: Study and construction: 2 years.
- Phase 2: Operation of the plant: 20 years.
- Phase 3: Decommissioning: 1 year.

2. Number of parcels to be rented for the Project?

The municipality suggested renting out all the ridge, instead of renting parcels where turbines will be placed, at the same price of 7,000$/ MW installed capacity.

3. Price clarification as suggested by the companies?

The municipality asked if the 7,000 USD/MW was per installed capacity or per produced. The companies replied that the suggestion is per installed capacity. Therefore, if the selected EPC ultimately chooses to install 20MW on their lands, the total rental value will be as follow:

- Phase 1: During Construction: 700$ x 20MW = 14,000 USD / year; installation phase.
- Phase 2: Following Erection of Turbines: 7,000$ x 20MW = 140,000 USD/year, plus a 2% escalation per year; operations phase.
- Phase 3: During Decommissioning of Turbines: the final escalated yearly rate, paid on a monthly basis until decommissioning is completed.

4. Will a copy of the Lebanon Wind Power ESIA be provided?

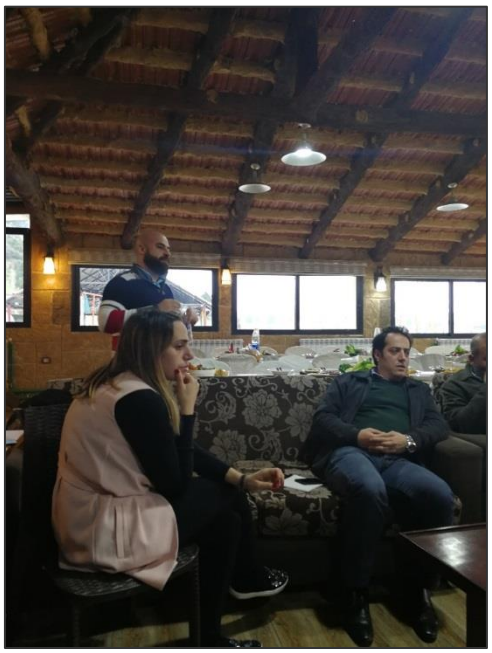
Once the study is completed, it will be published on all of the lenders' websites for comment, and therefore, Lebanon Wind Power will share it with the municipality.

Table 4-4 Summary of Discussions During/Following the Final Public Disclosure Meeting

Remark / Concern	Response
Mr. Mohammad Al Sayed, electrical engineer, was concerned about the accuracy of the deadlines. He said: since 2014 the Lebanese government was talking about the wind farms and promised renewable energy in 2018, now we are in December 2018 and the current deadline is 2020. He suspects that 4 months are not enough for project implementation, knowing that in Europe, the implementation of such wind farm needs up to 18 months.	Mr. Jules Assi, LWP Project Coordinator, advised that work on the wind farms could not be mobilized before November 2017, when LWP, SA and Hawa Akkar signed the PPP agreement and they were allowed to start working. They have a 36-month term for the final delivery of the project.
Mr. Mohammad Al Sayed asked about the infringements made on the public power grid and what is the solution provided by LWP	Mr. Jules Assi replied that the LWP agreement with MOEW includes producing electrical power and supplying it to the public grid. The solution for the infringements is not within the scope of the project developer.
Mr. Ahmad Zakaria, teacher holding a degree in the renewable energy domain, asked if the wind farms can provide enough electrical power to satisfy the commitment by the government to supply 12% energy demand through renewable energy sources. He also asked whether the implementation of the wind farms would cover the electrical power shortage.	Mr. Jules Assi replied that the planned 3 wind farms are able to satisfy a significant portion of the commitment, and that they will supply 25% of the shortage.
Mr. Mohammad Al Sayed asked where the remaining 75% of the shortage will be supplied from.	Mr. Jules Assi advised that this is a concern which needs to be taken care of by the Lebanese government.
Mr. Georges Ghattas, representative of the TBWA Agency, was concerned about the noise, knowing that at an air speed of 20 m/s makes a remarkable noise even without the existence of a wind turbine He also asked whether a study was made on the impact on any future buildings that are to be constructed around the turbines He asked who is going to recruit the HSE expert. He finally enquired about the wind speed at which there will be electrical energy production.	Mr. Jules Assi advised that the wind turbines will stop working at wind speeds exceeding 25 m/s which is a self-protection mechanism to maintain the integrity of the turbine. Dr. Layale added that noise next to the turbine may be more than 100dBA but will decrease substantially at a distance of 200m from the turbine and people should not consider building houses at a distance lower than this. She also added that a vast majority of the lands surrounding the turbines are public lands with no title deeds, and therefore with limited potential for investment in projects other than those supplying governmental services, a fact which decreases the significance of the latter noise impact. Mr. Jules mentioned that noise from any electrical appliance inside a house could be more than 60dBA. He also replied that LWP will recruit its own HSE expert who will be responsible for the follow up on environmental management at the LWP wind farm. He advised that electrical energy production starts at a minimum wind speed of 5m/s.
Dr. Mohammad Nour EL Din Ali, lecturer at the Arab University, asked if the number of trees that will be cut was quantified. He also asked if the Ministry of Environment will monitor the project implementation and functioning He also enquired about the party who will monitor noise levels during the operation of the wind farm He finally asked about the fate of the 3 met masts present onsite whether other masts will be installed.	Dr. Layale advised that the number of trees present in the immediate construction zone were quantified and referred to the relevant tables about the matter in the presentation. Dr Layale also added that LWP is responsible for recruiting an HSE specialist who would need to properly implement all ESMP requirements. She also added that the Ministry of Environment would conduct inspections in the future to ascertain that the ESMP is implemented and that the latter inspections may involve actual measurements. Mr. Jules added that the lending banks also have third party auditing processes who would check for ESMP implementation and compliance with environmental standards before giving clearances to release payments to the project developer. Mr. Jules also added that the 3 meteorological masts will stay until February 2019, and afterwards another 3 will likely be added by the turbine manufacturer all while keeping one of the old 3 met masts for calibration purposes.

Remark / Concern	Response
	Mr. Jules advised that the Lebanese government will also be supervising their work.
Mr. Ahmad Khaled Zakaria, mechanical engineer, was concerned about the coordination between LWP and the municipality in the selection of turbine locations. He also asked who is going to benefit from the project? What is the approximate turbine size? And what is the turbine height?	Mr. Jules advised that once a turbine manufacturer is selected and the final places of the turbines are chosen, the municipality will directly be notified about the latter. In terms of benefits, Mr. Jules explained that there will be recruitment of up to 200 persons during construction from the local community in addition to several jobs during operation. He also added that the local municipalities and communities will benefit from road widening activities and the development of new roads. With respect to turbine size, Mr. Jules answered that it is not yet decided, but that the hub height will be approximately 105m.
Mr. Georges Ghattas was concerned if there is an impact on the groundwater	Dr. Layale explained that wind farms are not associated with a negative impact on the groundwater. She also added that the groundwater is very deep in the project area, and that WWTPs will be installed at wastewater generation points to ensure the safe treatment and disposal of wastewater.
Mr. Abed EL Ileh Zakaria, head of the union of the municipalities in El Kaytea, was concerned about the road to be taken when the construction starts. Is it going to be through Qobaiyat? He suggested a road from El Deniyyeh to Fnaidek.	Mr. Jules answered that the road to be taken starts from Tripoli port and continues to Minyeh, Abdeh, seaside road, Chadra, train railway, Wadi Khaled, Hawa Akkar site, SA site, Rweimeh Village, then the LWP site. He also added that the project developer does not mind discussing further the feasibility of the new proposed road with the municipality.
Mr. Ahmad Naaman, principal of Fnaidek public high school, was concerned about what parts of the turbine may present malfunctioning. He also asked about what can be done to help the locals, so they can have better chances to be recruited?	Mr. Jules answered that bad weather conditions, e.g. ice, very high wind speed may harm the turbine parts. He also added that the turbines have a de-icing mechanism when located at high altitude and will be stopped in extremely windy conditions. The monitoring and control of the turbines will be implemented by the turbine manufacturer in collaboration with a local control and support office. Mr. Jules also answered that there will be online and onsite training courses so that the chances of recruitment of the locals would be increased.

Figure 4-14 Photographs Taken During the Final Public Disclosure Meeting



4.1.3. 2019 Activities

4.1.3.1. Ramboll Meetings with Family Leaders and Officials

Between 19 and 21 January 2019, Ramboll conducted discussions with Mr. Abdo Jaafar (of the Jaafar Family), General Amid Daher (of the Daher Family), Mr. Ahmad Baarini (the Mayor of Fnaidek), and Omar Massoud, as shown in **Figure 4-15**. Ramboll provided an overview of the ESIA and sought feedback regarding the baseline environment, analysis of impacts and the preparation of Environmental and Social Management Plans. All three leaders communicated the full support of the communities they represent.

Figure 4-15 Ramboll Meeting with Omar Massoud

4.1.3.2. February 2019 Public Meeting for Hawa Akkar

Hawa Akkar held a Public Meeting on 15 February 2019. Attendance at the Hawa Akkar Public Meeting is relevant to Lebanon Wind Power, and presented herein, as both projects will share the same WTG transport route. Invitations were sent out 2 weeks prior to the public meeting in written form (official registered letters) and by phone calls. Again, interest was noted as low, with one representative of a Union of Municipalities noted in attendance. In addition, representatives from the following NGOs were invited to this meeting, along with leadership from the villages noted above, as shown in **Table 4-5**. Only representatives from two NGOs were in attendance.

Table 4-5 NGOs Invited to Hawa Akkar Public Meeting

NGOs	
SPNL (Society for the Protection of Nature in Lebanon).	ALMEE (Lebanese Association for Energy Saving & for Environment).
Wild Animals and Birds Research & Information Center.	Horsh Ehden Nature Reserve.
Tannourine Cedars Forest.	Chouf Biosphere Reserve.
Palm Islands Nature Reserve.	Committee of Bentael National Park.
Communal Council for the Development of Tannourine.	Conseil De L'Environment – Quobayat.
Conservation of Environment Committee- Besharry.	جمعية الخدمات الإنسانية والاجتماعية في اللبنان الشمالي.
لجنة رعاية البيئة في اللبنان الشمالي.	Safadi Foundation.
Committee of Employee Women Union in North Lebanon (CEWU).	North Lebanon Economic Development Agency (North LEDA).
Live Akkar.	Inmaa Koura Akkar.
Akkar Network for Development.	Association for Development in Akkar.

4.1.3.3. Meeting with Lebanese Army Representatives

On February 7, 2019, the Lebanon Wind Power and Sustainable Akkar teams met with the Lebanese Army at the Chadra Military Base, as shown in **Figure 4-16**. Mr. Jules Assi, Engineer Bachir El Marj and Engineer Sarkis Farah engaged in a general discussion about Project details with General Youssef Haddad, Army Regional Director in Chadra.

The main topics discussed during the meeting were:

- How Lebanon Wind Power and Sustainable Akkar benefit from the Lebanese Army presence.
- Facilitating the procedure of acquiring necessary permits from the Lebanese Army to visit the site, especially for international personnel.
- Discussing the main concerns of the Lebanese Army, which included the following:
  - The noise impact of turbines on their barracks and the distance that should be maintained between the barracks and the turbines.
  - Shadow flicker and the length of the effect that will be visible for receptors.
  - The transport of the turbines, when and how it will be conducted, during which hours and the duration.

At the end of the meeting, General Youssef Haddad appointed Captain Abdallah Al Zohbi as the contact person between the Lebanese Army and the Project, in order to help with day to day tasks that may arise and requests, i.e. short notice permits for international personnel visiting the site.

Figure 4-16 Meeting with the Lebanese Army

4.1.3.4. Consultation with Villages Along the Wind Turbine Component Transport Corridor

Consultation activities were undertaken on 19-20 February 2019 with mayors representing the villages along the WTG component transportation route, from Tripoli to Sahle, and included the following:

- Tripoli
- Al Beddaoui
- Deir Amar
- Al Minie
- Al Nabi Kzaiber
- Zoug Bhannine
- Al Mahmra
- Al Aabde
- Khane
- Harat Al Jdideh
- Al Hissa
- Hissa
- Tall Hmaire
- Aabboudiye
- Janine
- Noura-El Tahta
- Dabbabiyeh
- Fraidis
- Menjez
- Rmah El Nahriye
- Chikhlar
- Chadra
- Machta Hassan
- Machta Hammoud
- Khaisa
- Mqaible
- Sahle

Table 4-6 Consultations with Municipalities & Governors

Name	Towns and Villages Represented	Date
Al Fayhaa Union of Municipalities	Tripoli, Al Beddaoui, Al Minie and Qalamoun	19-Feb-19
Deir Ammar Municipality	Deir Amar	19-Feb-19
Al Minie Municipality	Al Minie and Al Nabi Kzaiber Village	19-Feb-19
Zoug Bhannine Municipality	Bhannine	19-Feb-19
Al Mhamra Municipality	Al Mhamra	19-Feb-19
Talmaaiyan Union of Municipalities on behalf of the Akkar Countryside Municipalities	Talmaaiyan, Aarida, Knaisse, Massoudiyeh, Tal Bireh, Tal Abbas East, Hissa, and Abboudiyeh	20-Feb-19
Kobet Al Choumra Municipality	Kobet Al Choumra	20-Feb-19
Mqaible Municipality	Mqaible	20-Feb-19
Governor of the Akkar Region	Akkar Region	20-Feb-19
Qobaiyat Union of Municipalities on behalf of the North Akkar Municipalities	Qobaiyat, Chadra, Mashta Hassan, Mashta Hamoud, Aouinat, Rmeh and Aaydamoun	26-Feb-19
Governor of North Lebanon	North Lebanon	26-Feb-19

Al Fayhaa Union of Municipalities

On February 19, 2019, the Lebanon Wind Power and Sustainable Akkar team met with the mayors of the coastal line municipalities within the Northern Governorate, starting at the Al Fayhaa Union of Municipalities (representing Tripoli, Al Beddaoui, Al Minie and Qalamoun) to the Akkar Governorate limit, i.e. the Mhamra Municipality.

Eng. Bachir El Marj and Eng. Sarkis Farah met each of the 4 mayors of the Al Fayhaa Union during their weekly meeting, as shown in **Figure 4-17**. The meeting was constructive, many questions were asked about the timeline of the transport of WTG components, the schedule of each transport, potential obstacles on the road and potential traffic blockage.

Figure 4-17 Al Fayhaa Meeting with Mayors of Tripoli, Al Beddaoui, Al Minie and Qalamoun

The main concern of the Mayors was the timing of the transport. The Mayors advised to undertake transport after 12am, when the traffic is at its lowest, and to avoid transport on weekends as much as possible as many people travel north (including Akkar) to/from Beirut where they work during the week. The Project team answered the Mayor's questions as follows:

- Timetable: Between 12am to 4am.
- Timeline of transport: 2 times roundtrip per week during weekdays.
- Number of trucks per transport: Total of 11 trucks roundtrip per transport day / 2 days per week during weekdays = total of 22 trucks roundtrip per week.
- Number of trips: Maximum of 17 turbines at Lebanon Wind Power = 22 trucks roundtrip per week for total of 8.5 weeks.

The Project team also informed mayors that a communications protocol is being developed between the Project companies and the MOIM for the transport of the turbines from Tripoli to the Project site. Once this protocol is ready, it will be distributed to the Mayors two to three months prior to the start of the transport. At the end of the meeting, Mayors emphasized their willingness to provide further coordination across the municipalities and Project companies and assisting in accomplishing the Project as the fastest possible.

Deir Ammar Municipality

On February 19, 2019, the Project team met with Eng. Khaled Dhaybi, Mayor of Deir Amar, as shown in **Figure 4-18**. Deir Amar is located at the first Lebanese Army Checkpoint along the WTG transport corridor.

Figure 4-18 Deir Amar Meeting with Mayors Dhaybi

Mayor Dhaybi was welcoming and offered to assist the Project companies by providing a Municipal Police escort to facilitate the transport of the WTG components. The Mayor's main concerns regarded the provision of electricity in the northern region and if Deir Amar will benefit from the Project, as Deir Amar has an Electric Power Plant and is a link between the north and other Lebanese regions. The Project team explained the Project details, including the output of the Project in megawatts (68.3 MW for Lebanon Wind Power and 82.5MW for Sustainable Akkar), and explained that the Project boundary ends when the companies connect to EDL's National Grid.

Mayor Dhaybi also asked about the presence of pedestrian bridges in Deir Amar. The Project team assured the Mayor that no pedestrian bridges will be completely removed to accommodate transport of the WTG components; however, they will be elevated to achieve the needed height clearance of 5m. In addition, the Project team confirmed that costs associated with any road improvements will be borne by the Company.

<u>Al Minie Municipality and Al Nabi Kzaiber Village</u>

On February 19, 2019, the Project team met with the Mayor of the Municipality of Al Minie, Mr. Zafer Zrayka, as shown in **Figure 4-19**. The Mayor informed the Project team that Al Nabi Kzaiber Village does not have a municipality and is under Al Minieh's municipal authority.

Figure 4-19 Al Minie and Al Nabi Kzaiber Village Meeting

The Mayor welcomes the Project and gladly expressed that finally some investment will be coming to the north area of Lebanon --- after being left by the central government of Lebanon. Mayor Zrayka was friendly and willing to cooperate with the Project companies. During the WTG component transport phase, the Al Minie municipal police will provide an escort for the convoy.

The Mayor's only question regarded the speed bumps in the area. He expressed his opposition to removing them because there are many exits, and speed bumps are the only way to ensure the safety of the road. The Project team suggested replacing the asphalted speed bumps with rubber ones, which we can easily be removed during the transportation of the WTG components and reinstalled immediately after the trucks pass. Mr. Zrayka welcomed the idea, especially since the Project companies will be responsible for the expense of removing and reinstalling the speed bumps.

<u>Zoug Bhannine Municipality</u>

On February 19, 2019, the Project team met with the Mayor of Bhannin, Mr. Abou Tala Webheh Municipality, as shown in **Figure 4-20**.

Figure 4-20 Meeting with Zoug Bhannine Municipality

The proposed plan for the transport of WTG components was explained, and the Mayor advised that he was fine with all aspects. However, he noted that the Bhannine Municipality does not have an available police force to assist with the escort. Mr. Webheh was also concerned about the speed bumps in the area, and the Project team proposed the same solution of replacing the asphalted speed bumps with rubber ones, which we can easily be removed during the transportation of the WTG components and reinstalled immediately after the trucks pass.

The Mayor raised another concern regarding people going to and from Akkar during the WTG transport. The Project team informed the Mayor of the planned steps that the Project companies will be adopting to mitigate this potential negative impact, as itemized below:

- Transport Timetable: Between 12am to 4am.
- Announcements will be made along the WTG transport route (i.e. from Tripoli to the entrance of the Project site).
- A communications protocol is being developed between the Project companies and the Ministry of Interior for the transport of the turbines from Tripoli to the Project site. Once this protocol is ready, it will be distributed to the Mayors two to three months prior to the start of the transport.

<u>Al Mhamra Municipality</u>

On February 19, 2019, the Project team met with the Mayor of the Municipality of Al Mhamra, Mr. Abed Elkader Osman, as shown in **Figure 4-21**.

Figure 4-21 Meeting with Municipality of Al Mhamra

The Mayor was aware of the Project as he had attended the Hawa Akkar Public Meeting on 15 February held in Machta Hassan. The concerns raised by the Mayor were very aligned with the other municipalities, with the addition of concerns regarding the Abdeh Roundabout. The Project team informed that mayor that some modification might be needed on this roundabout, but any modification will be discussed with the municipality as it is under their authority. The Project team concluded the meetings by confirming that the cost of any modification to the roundabout that might be needed will be borne by the Project companies.

Meetings with Akkar Countryside Municipalities

On February 20, 2019, the Project team met with all 8 mayors of Akkar countryside municipalities within the Akkar Governorate at the Talmaaiyan Union of Municipalities, based on a request to gather all municipal leadership in the area, as shown in **Figure 4-22**.

Figure 4-22 Meeting with the Talmaaiyan Union of Municipalities

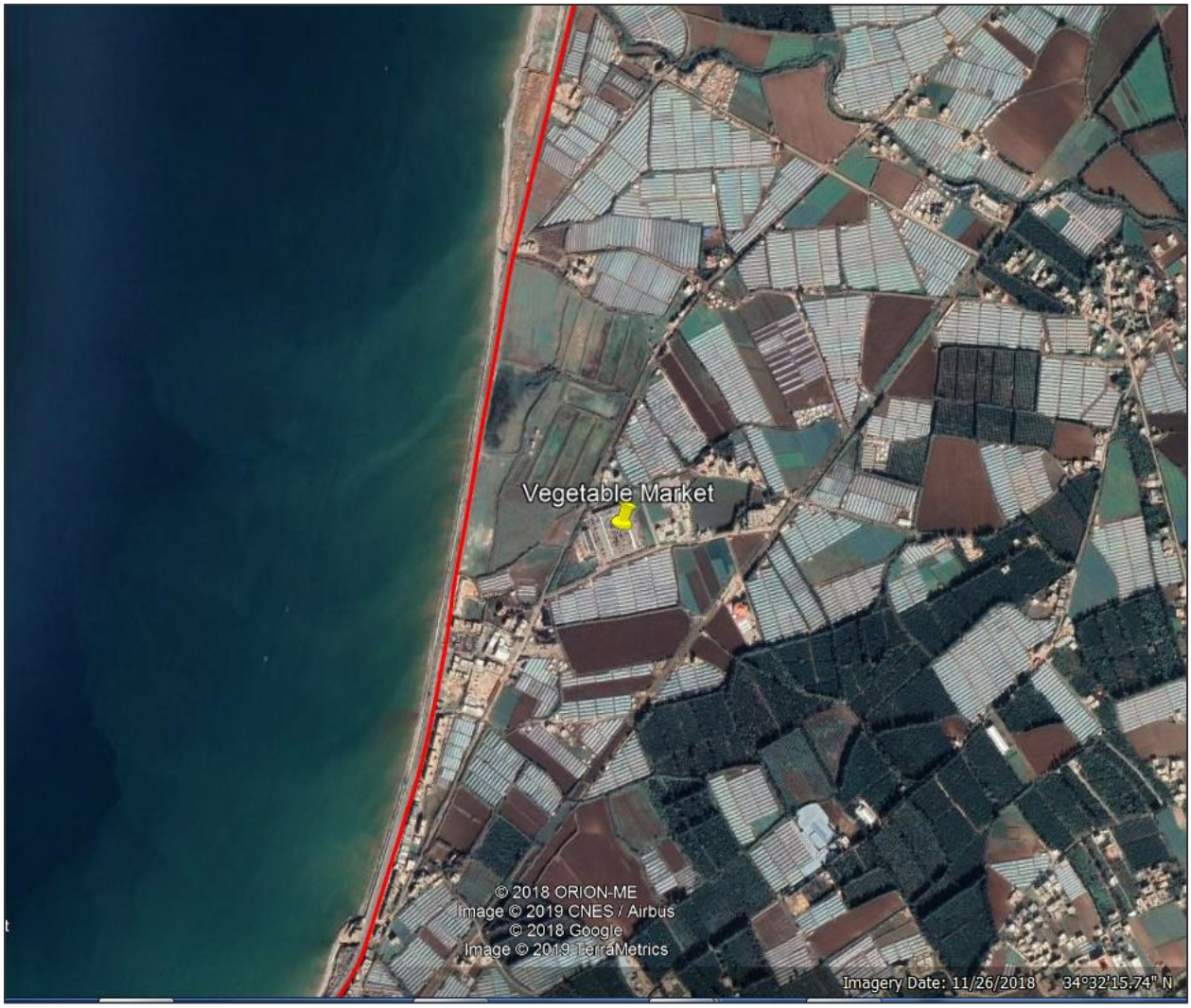
The Talmaaiyan Union of Municipalities is located next to Qlaiyaat Military Airport on the coastal countryside of Akkar, and includes the following:

- Talmaaiyan (Mayor Mohamad Masri).
- Aarida (Mayor Ali Assaad Khaled).
- Knaisse (Mayor Khodor Idris).
- Massoudiyeh (Mayor Mohamad Ayash).
- Tal Bireh (Mayor Abd alhamid Saker).
- Tal Abbas East (Mayor Mohsen Saleh).
- Hissa (Mayor Mohamad Ali Hsein).
- Abboudiyeh (Mayor Mohamad Al Masoumaaii).

The Project team introduced the Project and the purpose of the meeting. During the meeting, many questions were asked about the Project regarding electricity generation, road conditions, the timeline of the transport, the schedule of each transport, obstacles on the road and traffic blockage as follows:

- **Road conditions:** The road segment with the Talmaaiyan Union of Municipalities is only one lane in each direction, despite that it is the main road linking Akkar to the rest of Lebanon (as well as the main link between Lebanon and Syria). The following suggestions were made:
  - From Abde to Sheikh Ayash, widen the road by at least 1m on each side.
  - Improve the road quality by fixing potholes and maintaining the asphalt.
  - Put pressure on the government fund the Project with $800 million to widen the road.
- **Access to the Akkar Vegetable Market**: Farmers take their crops every day to the Akkar Vegetable Market, located ~0.35km east of the transport corridor between Al Aabde and Khane as shown in **Figure 4-23**, leaving at 2am and returning at 3am.

Figure 4-23 Location of the Akkar Vegetable Market



It was suggested that the transport of Project trucks requires coordination with the Ministry of Interior as the Akkar countryside is the main supplier of vegetables to the northern territories and all of Lebanon. It is noted that access to the Akkar Vegetable Market is provided by other roads.

- **Transit:** The road is the main access for trucks going to and from the Lebanese-Syrian border; therefore, close coordination between the Ministry of Interior and Project companies in order not to affect the international trade between Lebanon and rest of countries.
- **Speed bumps:** Speed bumps should be replaced by rubber ones which can be removed and reinstalled after each transport.
- **Potholes:** Maintain the road and fix the potholes on the road from Abde to Sheikh Ayash.
- **Cars parked on the road:** This has to be coordinated with the Municipal Police prior to the beginning of each transport.
- **Electrical cables:** Cables lower than the clearance height should be replaced and increased to higher than 5.5m.

- **Electricity:** They urged to increase the electricity supply in Akkar countryside region, where many farmers need electricity to power water pumps to grow their crops.
- **Employment:** The Talmaaiyan Union asked the Project team to employ people from the Akkar countryside, noting the unemployment rate in this region as one of the highest in Lebanon.
- **Closing the Minieh-Abde exits:** Closing these exits will ensure that people won't crush the transport convoy by going against the traffic. This will ensure the safety of the transport.
- **Timetable and schedule of transport:** the transport will be two times per week from 12am to 4am. The convoy will consist of 11 trucks roundtrip per transport.

Kobet Al Choumra Municipality

On February 20, 2019, the Project team met with the Mayor of Kobet Al Choumra Municipality, Mr. Hussein Ali Ibrahim, as shown in **Figure 4-24**. In the meeting, the Mayor expressed his wish to cooperate with the Project's team to ensure the smooth transport within Kobet Al Choumra. The Mayor's main concern was the time of the transport; the Mayor advised to undertake transport between 12am and 3am to ensure that the Akkar Vegetable Market won't be affected by the convoy. The Mayor insisted on keeping the speed bumps on the 3km segment of road in Kobet Al Choumra, which is located at the exit of the vegetable market.

Figure 4-24 Meeting with the Kobet Al Choumra Municipality

Mqaible Municipality

On February 20, 2019, the Project team met with the Mayor of Mqaible Municipality, Mr. Ali Hassan Alsaiid. The Mayor expressed his readiness to cooperate; however, he requested an accurate map of the access road from Mqaible to ensure that the road won't create any conflict between the communities. The Project team promised to give him the map(s) once it is finalized.

The Project team discussed the road condition in Mqaible, and the Mayor advised them to improve the quality of the road, i.e. use asphalt when opening the access to ensure better transport conditions from Mqaible to Akroum.

Akkar Governate

On February 20, 2019, the Project team met with the Governor of the Akkar Region in Halba, Mr. Imad Labaki, as shown in **Figure 4-25**. The Project team provided an overview of the Project and technical information about the transport plan, timetable, schedule and number of trucks going from the Tripoli seaport to the site. The Governor appreciated the visit and offered help in any legal and technical issues which can facilitate the transport of the trucks.

Figure 4-25 Meeting with the Governor of the Akkar Region

North Akkar Union of Municipalities

On February 26, 2019, the SA/LWP team met all seven mayors of the North Akkar area, based on a request to gather all municipalities in the area. The meeting took place in Qobaiyat with the Qobaiyat Union of Municipalities. The Qobaiyat Union of Municipalities includes the following municipalities: Qobaiyat (Al Aabdeh), Chadra (Simon Hannah), Mashta Hassan (Mhamad Ahmad), Mashta Hamoud (Mhamad Khaled), Aouinat (Georges Wehbi), Rmeh (Georges Elias), Aaydamoun (CL. Youssef Abboud), as shown in **Figure 4-26**.

Figure 4-26 Meeting with North Akkar Union of Municipalities

Many questions were asked about the project, electricity, road condition, timeline of the transport, schedule of each transport, obstacles on the road and traffic blockage. Below is a summary of the concerns and ideas that have been discussed during the meeting:

- **Road condition:** The road was slightly better than the rest of the Akkar area, but it needs some improvement in order to successfully transport the turbines from the Tripoli Port to the Project site. The road needs some quality improvement by fixing potholes and maintaining asphalt in some section in Machta Hassan and Machta Hammoud area. Note: the internal roads of Machta Hassan and Machta Hammoud will not be used for transport.
- **Solar lighting poles:** When the team introduced the project, Qobaiyat and Machta Hamoud Mayors explained the issue of some renewable energy solution that been implemented in the area, such as solar lighting poles. The mayors explained the high maintenance cost of these poles, from the expensive batteries to transformers which have a life cycle of a maximum 2 years. The team explained the difference between solar and wind which does not require any storage system.
- **Quarry:** The road is the main access of the trucks transporting rocks and gravel from Boustan area east-southeast of the Project site. The quarries are constantly maintaining the roads in the area in order to get support from the communities. The same maintenance activities have to be done by the Project Proponent.
- **Speed bumps:** Surprisingly, all mayors were against using speed bumps especially on Abboudiye-Rmeh highway. They have no problem at all with removing the speed bumps in this section of the road; however, they urged the Project team to keep the speed bumps in Machta Hassan and Machta Hammoud because it is a highly populated area and the roads are pretty narrow. Mayors told the team that the speed bumps should be built based on international standards: 3.75m long and 8cm in height. Note: the internal roads of Machta Hassan and Machta Hammoud will not be used for transport.

- **Potholes:** Maintain the road and fix the potholes on the road from Chadra to Machta Hammoud. Note: the internal roads of Chadra, Machta Hassan and Machta Hammoud will not be used for transport.
- **Electricity supply:** They urged to increase the electricity supply in North Akkar region because this area is the closest to the Project site and Qobaiyat has the main power plant which distribute the electricity to the whole region. The Mayors asked the Project team to put pressure on EDL to provide 24/7 electricity supply to the area, providing an example of the Shouff Area where a new landfill has been constructed there and the community put a pressure on EDL to provide 24/7 electricity supply to the area. The team explained that the municipalities in the area have to apply the pressure on the government and that the Project company has no right to change the electricity supply.
- **Employment:** The Union asked us to employ people from North Akkar area to work on the Project. The employment has to be divided equally on each municipality region. The Project team explained that the top priority is to employ people from the area surrounding the Project.
- **Chadra Roundabout:** Mayor Simon Hannah said that Chadra municipality paid around $50,000 to fix the Chadra entrance and createed a roundabout in order to facilitate the traffic flow from Machta Hassan and Machta Hammoud. If this roundabout is going to be removed during the transport phase, the Project team has to reconstruct it on its own expense. The team explained that based on the road survey study, the roundabout will not be removed.
- **Development:** The Project will contribute positively on the area, where people working on site will need accommodation, restaurants, and general services in the area.
- **Helicopter Option for Transport of WTG Components**: The Mayor of Machta Hammoud asked about using the helicopter option to transport the turbines to the site. The Project team explained that the road will be used for the transport of WTG components, noting that the Project company will maintain the road all the way from Tripoli Port to the Project site which will benefit the people using these roads.
- **Karm Chbat Forest Reserve:** The Mayor of Qobaiyat asked the Project team to put pressure on the government to declare the Karm Chbat Forest Reserve a natural preserve. Declaring the forest as a natural preserve will stop farmers from grazing goats there. Grazing is the main threat to the forest, where the goats constantly graze small trees; rhis is why there is only big trees in the forest and it is really rare to see newly trees growing. In addition to stopping the grazing, making the forest a natural reserve will stop people from the area from cutting tree just to use it as a heat source during winter.
- **Timetable and schedule of transport:** The transport of WTG components will be undertaken a maximum of two times per week from 12am to 4am. The convoy will consist of 11 trucks.

North Lebanon Governor

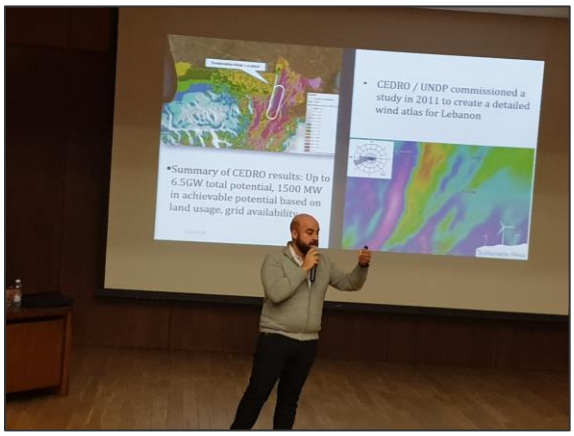
Eng. Bachir El Marj and Eng. Sarkis Farah met with the North Lebanon Governor (Ramzi Nohra) in Tripoli sarray, as shown in **Figure 4-27**. The meeting was constructive, the team explained the transport plan, timeline of the transport, schedule of each transport, obstacles on the road and traffic blockage. The Governor was supportive and promised to facilitate any issue we will be facing before and during the transport.

Figure 4-27 Meeting with the North Lebanon Governor

Beirut Arab University

Eng. Jules Assi and Eng. Bachir El Marj presented the Project at the Beirut Arab University, Department of Mechanical Engineering, focusing on renewable energy and energy efficiency, as shown in **Figure 4-28**. The team introduced the Project to University staff and students. Students expressed happiness about the Project and asked about requirements needed to apply for a job during the construction phase. The team offered an internship program for students wiling to learn and get experience about wind farms.

Figure 4-28 Project Presentation at Beirut Arab University



4.1.4. Public Participation Outcomes

As indicated in the previous sections, extensive public participation activities have been undertaken since early 2017. Activities have included participatory planning, disclosure and dissemination of information, consultation & participation, an informal grievance mechanism (formalized herein as an outcome of the ESIA), and on-going reporting to local communities.

All Affected Communities have been engaged to: 1) support the collection of social demographic data; 2) gain an understanding of community access to energy, consumption, and how the lack of a reliable energy supply may affect livelihoods; 3) understand attitudes of the local population toward the Project and expectations around better energy supply. The prevalent response of those engaged has been extremely positive, with community leaders and members anxiously awaiting the construction and operation of the Project.

It is noted that Sunni and Shiite landowners in the Project area have historically disputed the division of land. After becoming knowledgeable about the Project details, the need for acquisition and leasing of land, and the Project's commitment to fairly distribute compensation through the location of wind turbines and substation, and together visiting the project site, agreement concerning the division of land was reached over a short, 2-day period.

Project-related benefits have been expressed by community members as follows:

- Potential employment during construction and operations phases.
- Income generated by sale of land and land lease.
- Economic stimulus through provision of worker accommodation and meals at local hotels, apartments and restaurants.
- Provision of electricity to the grid to reduce or eliminate blackout periods.

There have been no objections raised by NGOs.

The concerns expressed by stakeholders have been clearly documented and addressed as part of the decision-making process of the Project. Specifically, concerns have been incorporated into decisions regarding the following:

- Land rental agreements and compensation.
- Siting of wind turbines to avoid noise, shadow flicker and visual impacts to receptors.
- Road development, route selection and timing for the WTG components and construction materials.
- Employment opportunities.
- Maintaining access to hunting tracks and grazing areas.
- Minimizing impacts to the Karm Chbat Forest Reserve.
- Maintaining a buffer around the Lebanese Army Military Base.
- Common traffic management plan for Lebanon Wind Power, Sustainable Akkar and Hawa Akkar wind farms.
- Quantifying potential impacts to migratory birds.

Though not present in the immediate study zone, particular attention was paid to vulnerable groups, i.e. Syrian and Palestinian refugees and the location of informal settlements, was considered. Based on the findings of the ESIA, vulnerable groups are not disproportionately affected by Project impacts (refer to Section 5 of the ESIA).

5. CONTINUATION OF THE STAKEHOLDER ENGAGEMENT PLAN

5.1. LWP Project Communication Plan

The Project's Communication Plan includes publication of a free newsletter (design is being developed by the graphic designer of LWP) and the installation of a freestanding bulletin board in all Affected Communities. This bulletin board will be one of the Project's main means of communicating to all the villages; it will consist of large posters with graphics and photos showing the progress in the construction of the Project along with general information about wind farms in general and LWP in particular.

The communication activities with the local communities will include the following:

- Both individual and community meetings similar to the ones that have been conducted since 2017. Meetings will continue to be arranged during the construction and operation phases. The frequency of these meetings shall be:
  - Daily for the individual meetings during the construction phase.
  - Every three months for the community meetings during construction phase.
  - Yearly and on demand basis during the operation phase.
- Monthly Project newsletters will be prepared and distributed starting April 2019 to local governmental authorities, and Mayors of the affected municipalities.
- Project Bulletin Boards will also be installed in all affected municipalities for the public to be made aware of the Project's progress.
- School supplies (for example: pens and notebooks with a description of a wind farm on the cover) are planned to be provided at the schools of the surrounding villages (e.g., Kfartoun, Anadaqet, Qobaiyat, Fneidek, etc.).
- Seminars and panel discussions are being conducted at various universities and schools in Lebanon and in particular in Akkar and north Lebanon governates.
- Brochures, leaflets and posters are also being developed by the Project Company and shall be placed at the Community Relations representative office in Kfartoun and distributed during the seminars that the communication team will be conducting.
- Suggestion boxes will also be installed (for submission of anonymous grievances) outside the Community Relations representative office in Kfartoun. At the beginning, these boxes will also be placed in the surrounding municipalities (i.e., Kfartoun, Anadaqet, Qobaiyat, Fneidek) and then the remaining municipalities; in particular, the municipalities affect by the transport of Wind Turbine components.
- The Project website will be expanded and updated on a regular basis.
- The Project Company has also launched the preparation of teasers spots to start introducing the Project to the local and national inhabitants of Lebanon.
- The project will also be heavily present on social media, such as Facebook, Instagram etc. On social media, LWP would place its announcements, work progress and information on wind farms in general and the Project itself.
- The project Company is also developing several informative movies that will be broadcast during the 18 months of construction (5 short movies will be developed) and one main movie that shows all Project phases (starting from development until COD) which will be broadcast on the Project opening day.

- The media coverage will not be limited to social media, but it is planned to have all the national Television stations to broadcast live the following main events:
  - Signature of the OEM contract.
  - Announcement of the financial close during a Gala dinner.
  - Transport of the 1st turbine from the Tripoli port to the Project site.
  - Opening the wind farm on COD date (the Lebanese Government would be invited to attend the opening).

The media coverage will not be limited to the above events, but regular coverage on the progress of Project works will also be done during the prime time news bulletins.

5.2. Describe the involvement of the Original Equipment Manufacturer (OEM)

Once the Project has selected the OEM to design, build and operate the wind farm, the External Relations Manager will closely coordinate with the OEM Community Relations Manager who will be responsible for managing interactions with local communities with respect to public health and safety, security, and other social concerns specifically related to the construction of the Project.

The OEM Community Relations Manager will also collaborate with LWP ERM on construction-related stakeholder engagement activities, and coordinate with LWP Project Manager in the investigation and resolution of any community grievances or other issues related to construction that involve local communities or external stakeholders.

6. TIMETABLE

6.1. Preliminary Timetable of Future Stakeholder Engagement Activities

The LWP Project management team, along with the OEM Project management team, where appropriate, will engage on a periodic basis with the following Lebanese governmental authorities:

- The Lebanese Ministry of Environment - MoE who will oversee implementation of the ESMP. In addition, the MOE requested that the Project provide them on a quarterly basis with progress reports during the construction phase and on an annual basis during the operation phase.
- Local governmental authorities including the Governor of the Area will be regularly kept updated on the Project's progress in order to keep their support as high as possible.
- Meeting with the Lebanese Army's focal point: the LWP Project management team will have monthly meetings with the Lebanese Army focal point to keep them updated on the work progress and upcoming events. During operations, these updates will be provided at meetings on an as needed basis.

The LWP Project management team, along with the OEM Project management team, where appropriate, will engage on a monthly basis with the Villages within the Project's DAOI:

Each month, throughout the Construction Phase, in accordance with a schedule mutually agreed upon among the parties (day and time), the LWP Project Representative assigned to each village will deliver and install the Monthly Project Poster in the Bulletin Box in each village. LWP Project Representative will then deliver a few copies of the Monthly Project Poster to the village mayor and conduct a meeting with the village mayor, key-people and anyone who would like to participate. During the meeting, the LWP Project representative will verbally summarize (primarily for the benefit of meeting attendees who cannot read) what's included in that month's Monthly Project Poster (e.g., provide an update on the Project's construction schedule for next month's construction activities, available jobs, update on any community investment activities) and will take and respond to questions raised by the village mayor and/or residents.

7. RESOURCES AND RESPONSIBILITIES

7.1. Community Relations Department Organizational Structure

Historically, since 2017, the Project Coordinator (now known as the Project Manager), Mr. Jules Assi, has reported directly to the General Manager of the company. In 2018, LWP appointed Mr. Sarkis Farah as External Relation Manager (ERM) who took charge of all the external communications between the land owners, municipalities, ministries and public institutions. In 2019, LWP also recruited Mr. Jihad Melhem, a local from the Project area, as the first Community Relations Officer (CRO), reporting directly to Mr. Sarkis Farah. Mr. Melhem will oversee opening the Project company's first office in the Project area, along with continuing day-to-day contact with the locals. At Financial Close, two additional CROs will be recruited (taking into account balancing between all the communities present near the Project site).

During the Construction Phase, the CROs will be reporting directly to the ERM who will be reporting to the Project Manager, and the Project Manager will be directly reporting to the Project Director.

The main role of the ERM will be to oversee the activities of the CROs, along with managing the overall implementation of the comprehensive Stakeholder Engagement Plan. In addition, the ERM will collaborate with the Main EPC contractor (either Vestas, GE or Siemens)'s Community Relations Manager on construction-related stakeholder engagement activities. The ERM Manager will also coordinate with the Project Manager and the Main EPC Contractor in the investigation and resolution of any community grievances or other issues related to Project construction that involve local communities or external stakeholders.

During Project operations, the ERM will report to the Operation Manager, who will report to the General Manager of the company.

7.2. Stakeholder Engagement Budget

Since the commencement of Project development in 2017, the yearly budget allocated to implementation of the Stakeholder Engagement Plan was on an as needed basis that increased during the Project's development stages, in particular, during 2017 and 2018.

For 2019, the budget contains 6 months for the development and 6 months for the construction phases. The Project budget included a robust set amount for stakeholder engagement. The total budget, which is confidential, includes pre-financial close (first 6 months of 2019) a set amount which will double for the next six months and the budget will cover:

1. Salaries of personnel working to implement the Stakeholder Engagement Plan.
2. Community Relations Office expenses.
3. Corporate social responsibility projects for 6 months (summary is provided below).

Figure 7-1 Stakeholder Engagement Organization Chart for the Construction Phase

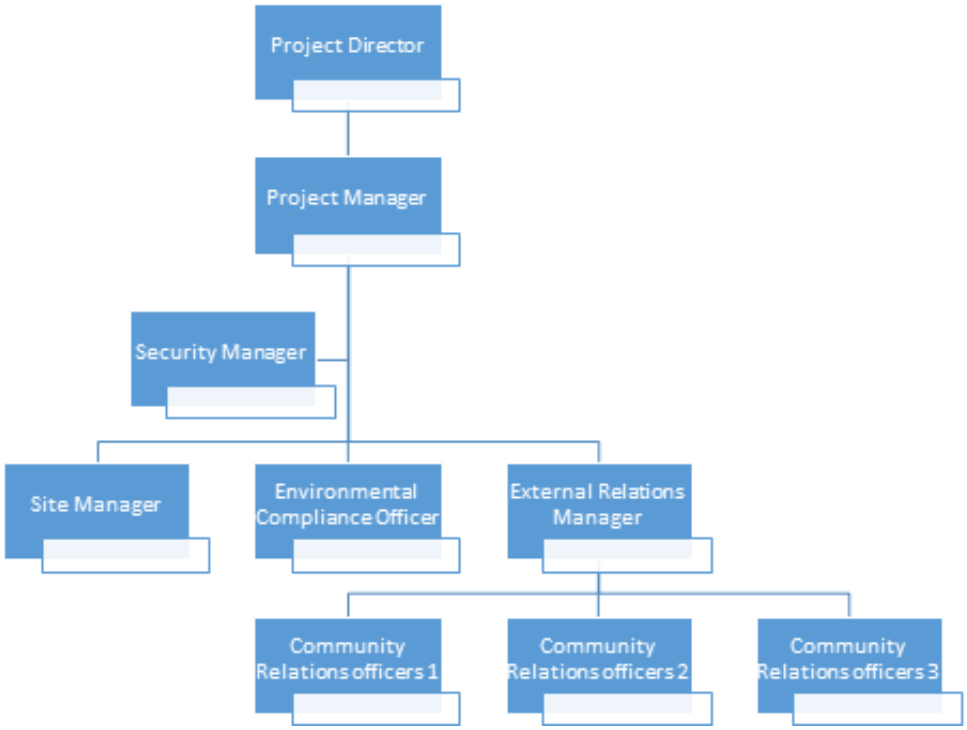


Figure 7-2 Stakeholder Engagement Organization Chart for the Operations Phase

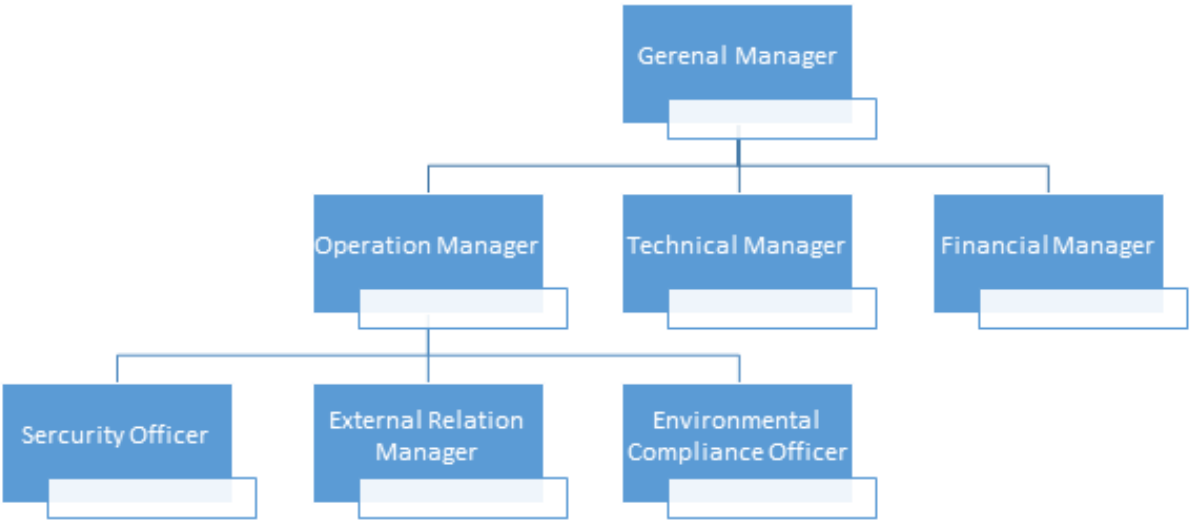


Table 7-1 Corporate Social Responsibility Plan for 2019

CORPORATE SOCIAL RESPONSIBILITY "CSR" Plan		
Sustainable Akkar "SA" Project		
Community	**Project Description**	**Budget** is confidential
Aandqet	1-Futsal Andqet team - sponsor for **5 years**	
	2-Purchasing **TWO** Generators to feed the village during EDL blackout periods	
Adraa Family	Rehabilitation of the Family reception area	
Kanaan Family	Rehabilitation of the Family reception area	
Rweimeh	To be agreed by the heads of Jaafar Family	
Lebanon Wind Power "LWP" Project		
Fnaidek	One-time fee up to the discretion of the municipality	
Jaafar Family	To be agreed by the heads of Jaafar Family	

8. EXTERNAL COMMUNICATIONS AND COMMUNITY GRIEVANCE MECHANISM

8.1. External Communications

LWP, through implementation of its Stakeholder Engagement Policy (Appendix A to this SEP), LWP Project Communication Plan, Corporate Social Responsibility Plan and Community Grievance Mechanism, has established a strong external communications program, which will enable the Project to engage with Affected Communities and other stakeholders in a very transparent way and will ensure that all stakeholders have a means to communicate with the Project.

8.2. Community Grievance Mechanism

The Community Grievance Mechanism is included in **Appendix B** to this SEP.

8.3. Ongoing Reporting to Affected Communities

Ongoing reporting to Affected Communities will take place in accordance with the schedule included in the LWP Project Communication Plan described in **Section 5.1.**

9. MONITORING AND REPORTING

9.1. Project Monitoring

Since the Project began in 2017, the LWP team has been present on site and meeting locals in order to communicate the Project's progress.

Performance under the SEP will be reviewed on an ongoing basis to determine its effectiveness, including the methods being used and the accuracy of the mapping results.

A formal evaluation will be done annually, during which the key performance indicators set out in **Table 9.1** will be used to determine the extent to which the objectives of the SEP have been met. Information from the stakeholder database and formal/informal feedback from stakeholders will be used to assess the key performance indicators.

Lenders' Project Monitoring Requirements will be confirmed prior to Financial Close.

9.2. Reporting to Satisfy Lenders' Requirements

The annual monitoring results will be used to update the SEP and will be reported internally as well as to the Lenders and other key external stakeholders, as requested.

Lenders' Reporting Requirements will be confirmed prior to Financial Close.

9.3. Key Performance Indicators

Table 9-1 Key Performance Indicators

Objectives	Performance Indicators
Implementation of the Project's Communication Plan	• Adherence to the schedule of Communication activities included in the Project's Communication Plan
Stakeholders are provided information about the Project construction in a timely manner; and have an opportunity to share their views and concerns about the construction	• Number and type of engagements that occurred and were recorded (i.e., meeting minutes and other records)
Positive working relationships are built with stakeholders and maintained over time	• Number and type of grievances submitted by stakeholders and recorded in the grievance log in the stakeholder database • Number of resolved & closed out grievances
Engagement continues to be transparent, inclusive and appropriate during construction	• Continued compliance with the Project's Communication Plan and SEP • Low number of grievances submitted since the commencement of the Project

Key Performance Indicators will be confirmed with the Lenders prior to Financial Close.

10. MANAGEMENT FUNCTIONS

How will stakeholder engagement activities be integrated into the company's ESMS and with other core business functions?

The Stakeholder Engagement Plan is a living plan, to be reviewed and updated annually.

Who will have management oversight for the program?

The stakeholder engagement activities will be directly managed by the Project's General Manager, along with the Project Manager, who both were heavily involved in the communications being conducted since the early stages of the Project.

What are the plans for hiring, training, and deploying staff to undertake stakeholder engagement work?

The Project Company recruited in 2018 its External Relations Manager, Mr. Sarkis Farah, who will be in charge of the day-to-day follow-up on the implementation of the Stakeholder Engagement Plan. In addition, the Project Company recruited in 2019 the first Community Relations Officer (CRO), Mr. Jihad Melhem, a local from the Project area and will be recruiting two additional CROs as soon as the Financial Close is reached and construction is initiated. The Project will be employing a Community Relations Advisor who will support and assist in training the ERM and CROs after Financial Close. The team will assist in distributing information and engaging with local villagers to keep them informed about the Project.

What will be the reporting lines between stakeholders' liaison staff and senior management?

The CROs will be reporting directly to the ERM who will be directly reporting to the Project Manager. The Project Manager has daily contact with the upper management of the Project and reports directly to the Chairman – General Manager.

How will the Project Company's stakeholder engagement strategy be communicated internally?
The Project Company plans to publish once per month a newsletter that will provide information on the Project's progress and all its related activities (including the Stakeholder Engagement Plan), in addition to the monthly coordination meeting during the construction and operation of the wind farm.

What management tools will be used to document, track, and manage the process (e.g., stakeholder database, commitments register, etc.)?

All communication will be documented using a digitalized archiving system that the Project will be establishing between the Project area office and the head office in Beirut.

For projects or company operations involving contractors, how will the interaction between contractors and local stakeholders be managed to ensure good relations?

The Project Manager and the ERM will participate in all construction progress meetings. Any grievances from Stakeholders will be addressed during these meetings. If necessary, action plans will be discussed, agreed and implemented accordingly. As part of the contracting process, contractors will be required to adhere to policies and procedures put in place by LWP, including the Stakeholder Engagement Plan and any other policies and procedures managing community relations.

SEP APPENDIX A – COMMUNITY GRIEVANCE MECHANISM

1.0 Objective

To receive and facilitate resolution of affected communities' concerns and grievances about the environmental and social performance of the Project. The grievance mechanism seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible.

1.1 Roles and Responsibilities

Lebanon Wind Power (LWP) recognizes that the successful delivery of the wind farm requires LWP to develop an open relationship with a wide range of local, regional, and international stakeholders. To this end they have engaged external experts to provide professional guidance, recruited key staff to lead the stakeholder engagement and communication exercise. LWP has provided a significant budget for stakeholder engagement activities along with a Corporate Social Responsibility Plan (SIP). LWP also has design and program responsibilities in the Project team. Community liaison and communication is the responsibility of the External Relations Manager at the company – Mr. Sarkis Farah, and he has the responsibility for managing and implementing the company's Stakeholder Engagement Program and who will report to the Project Manager, Mr. Jules Assi.

A formal Environmental and Social Management System (ESMS) will be implemented. This ESMS will be used to not only ensure the effective management of Environmental and Health & Safety risks, but also to manage Stakeholder Engagement activities. This system will be used to ensure that Project designers and planners are fully aware of the concerns of Project Stakeholders so that they can specifically address stakeholder concerns.

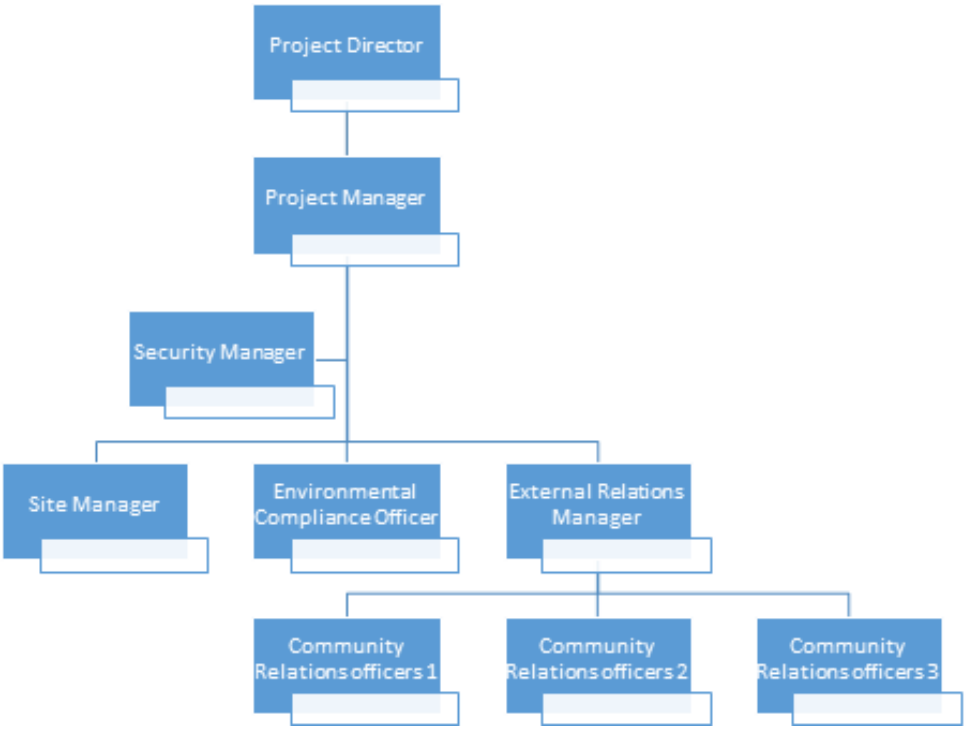
1.2 Process

A variety of methods are available through which stakeholders can lodge grievances. These include:

- Face-to-face meetings with the relevant Project representatives;
- Written communication (e.g. email, letter) directed to relevant Project representative or left in suggestion boxes, which will be located in all the villages within the DAOI and at the Community Relations Office in Kfartoun.
- Villagers may choose to speak to their village mayor or relevant village representative to help facilitate a written complaint; and
- Telephone call placed to a relevant Project representative.
- Input written grievances in the suggestion box placed in or near their village vicinity

All grievances will be recorded in a grievance log in the stakeholder database. This will include a summary of the grievance, the resolution or agreement on proposed actions (between the Project and the complainant), and monitoring actions taken in response to the grievance. The grievance log and grievance close-out form will be stored in the stakeholder database.

Figure 1. LWP Project Community Relations Organization Chart



A flow chart illustrating the Community Grievance Mechanism Process is provided in **Figure 2**. The key steps of the Community Grievance Mechanism Process are as follows:

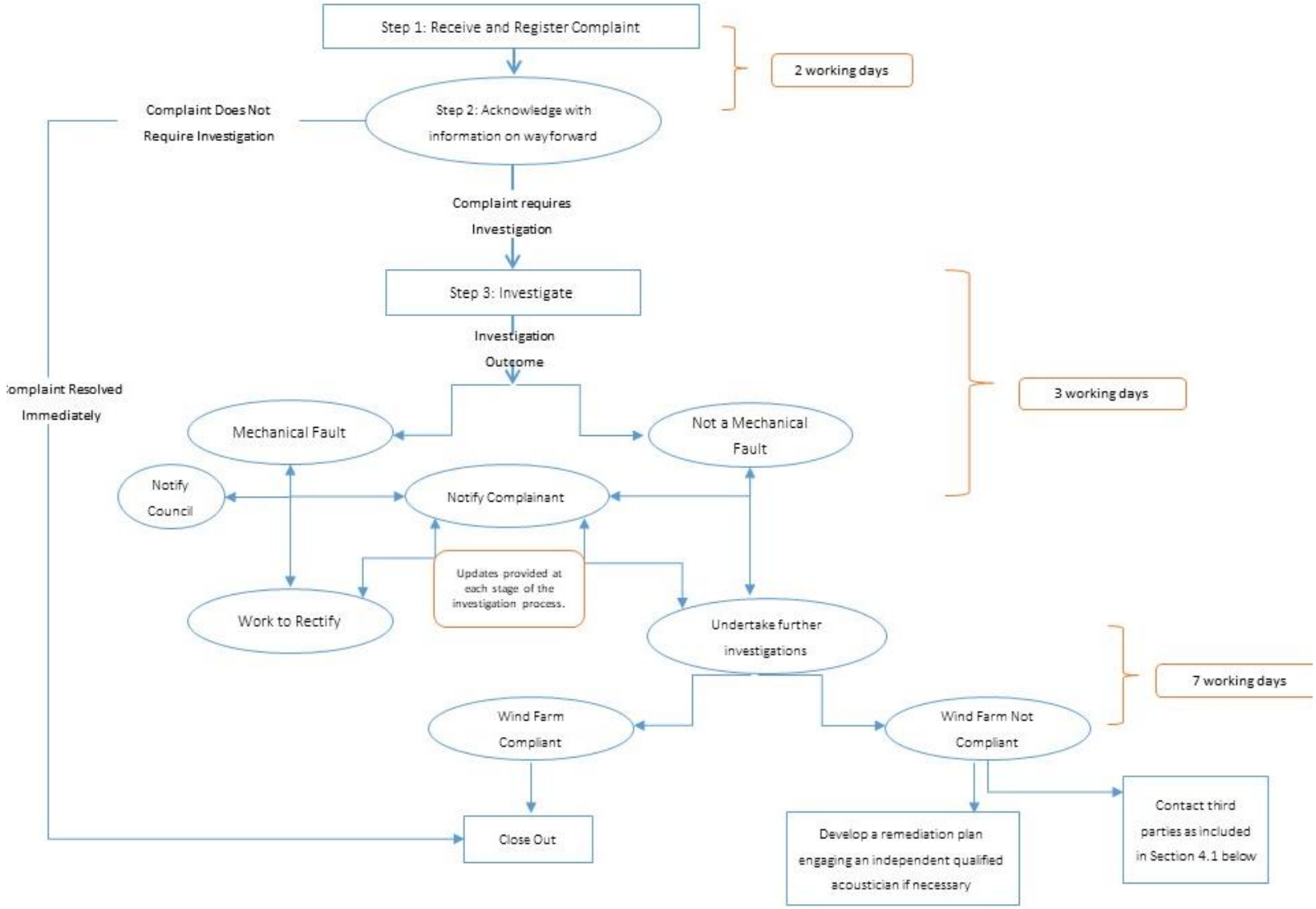
1. *Identification of grievances*. This could be by depositing a grievance in a suggestion box, or in person, by phone, letter, or email using the contact details below:

   Mr. Sarkis Farah
   External Relations Manager
   Email address: sf@sustainableakkar.com
   Telephone number: +961-81-477 208

2. *Grievance is recorded in a 'grievance log' (written and electronic) within 2 days of receipt. The grievance log will be held at [insert Project location]. The significance of the grievance will then be assessed within five working days using the criteria outlined in Box 1.*

Box 1. Significance Criteria
Level 1 Complaint: An inquiry, suggestion or request
Level 2 Complaint: A complaint of a minor nature
Level 3 Complaint: A complaint of a significant nature, such as a risk to community health and safety

Figure 2. Community Grievance Mechanism Process



3. *Grievance is acknowledged* through a personal meeting, phone call, or letter as appropriate, with the complainant no more than 5 working days after submission. If the grievance is not well understood or if additional information is required, clarification should be sought from the complainant during this step.
4. *The External Relations Manager is notified* of all Level 1, 2 or 3 grievances and the Project Manager is notified of all Level 3 grievances. The General Manager will support the External Relations Manager and the Project Manager in deciding who should deal with the grievance and determine whether additional support is required to respond to the complainant.
5. *The External Relations Manager delegates the grievance* to the relevant departments(s)/personnel to develop a response (e.g., Human Resources, relevant medical or administrative departments, contractors).
6. *A response is developed by the External Relations Manager within 7 working days* after acknowledging the grievance, with input from the relevant Project personnel and others, as necessary.
7. *The response is signed-off by the Project Manager for level 3 grievances and the External Relations Manager for Level 2 and Level 1 grievances within 5 working days* of preparing a response. The sign-off may be a signature on the grievance log or an e-mail which indicates agreement, which should be filed by the External Relations Manager and referred to in the grievance log.
8. *Communication of the response should be carefully coordinated.* The External Relations Manager will ensure that an approach to communicating the response is agreed and implemented, taking into consideration cultural sensitivities.
9. *Record the response received from the complainant to help assess whether the grievance is closed or whether further action is needed.* The External Relations Manager should use appropriate communication channels, most likely telephone or face to face meeting, to confirm whether the complainant has understood and is satisfied with the response. The complainant's response should be recorded in the grievance log.
10. *Close the grievance with sign-off from the External Relations Manager. The External Relations Manager will assess whether a grievance can be closed or whether further attention is required. If further attention is required, the External Relations Manager should return to Step 2 to re-assess the grievance.*

Once the External Relations Manager has assessed whether the grievance can be closed, he/she will sign off or seek agreement from the Project Manager for level 3 grievances, to approve closure of the grievance. The agreement may be a signature on the grievance log or an equivalent e-mail, which should be filed by the External Relations Manager and referred to in the grievance log. In additional, a 'grievance closeout form' will be used. This process is outlined in **Figure 2.** The grievance management process enables complaints to be lodged anonymously. Complainants are not required to provide their name when lodging a grievance. This is reflected in the grievance log and close-out template (**Appendix B**). All grievances will be archived into the Grievance Database. All grievances will be recorded, investigated and closed-out in the same manner – as described above and as set-out in **Figure 2.**

SEP APPENDIX B – GRIEVANCE LOG TEMPLATE

Project : Project Manager :

Project Location: In charge of completing the log:

Identification of the grievance and griever		Parcel No.	Type of stakeholder			Type of grievance			Submission of the grievance				Content	Acknowledgement and Response		Actions taken - Monitoring (yes/no, method, frecuency)		State of the grievance		Closed out		
Grievance No.	Full name		Land owner	NGO	Other	Comment	Grievance	Incident	Paper grievance form	Website Feedback form	Oral grievance	Date		Date	Description of actions	Date	Description of actions	Resolved	Partially resolved	Date	Resources spent	Final decision and actions taken

Stakeholder Engagement Policy

In its relations with Stakeholders, Lebanon Wind Power and Sustainable Akkar accepts and promotes the following basic principles:

a Maintenance of a strategy of strong involvement in the communities in which it operates, which achieves the engagement of all Stakeholders in the transition towards a healthier and more accessible electricity-based energy model.

b Development of a responsible business model in order to be an innovative, transparent, integrating, open and committed company, capable of creating sustainable value for all Stakeholders on a shared basis therewith.

c Allocation of the necessary resources to the proactive, continued and systematic establishment of fluid channels for dialogue with Stakeholders, in order to establish balanced relationships between corporate values and social expectations, taking into account their interests, concerns and needs.

d Development and maintenance of a dynamic organizational structure that allows for the promotion and coordination of responsible actions with Stakeholders and using various instruments to favor communication and dialogue therewith, within a constant process of adaptation to their needs, expectations and interests: direct contact, the Company's corporate website, the websites maintained by the different companies of the Group and the Group's proactive presence on social media. The ultimate goal of these tools is to encourage the engagement of all of the Company's Stakeholders, reinforce their sense of belonging, strengthen the Lebanon Wind Power and Sustainable Akkar brand, favor the development of the businesses of the Group, emphasis its social side and progress with the digital transformation of the Company.

e Commitment of the Group to business ethics and sustainable development and, in particular, the principles of business honesty and transparency as drivers of credibility and mutual trust, are the foundations on which the Group builds its relations with Stakeholders.

f Identification and consideration of the viewpoints and expectations of affected communities as part of decision-making processes that may have potential impacts on the local population. These actions are taken through consultation processes which vary based on country and activity and thus on the applicable law in each case. These processes can also be complemented with other processes on a voluntary basis, if deemed appropriate.

g Assignment to the Company of the duty of designing, approving and supervising the Stakeholder relationship strategy, endeavoring to ensure proper coordination at the Group level, without prejudice to the implementation of this strategy being governed by the principle of subsidiarity, such that the Group company that is closest to the Stakeholder is primarily responsible for interaction in each case.

h Preparation and disclosure of relevant and reliable periodic financial information and non-financial information regarding the performance and activities of the Group, subject to external independent verification when appropriate.