

REPUBLIC OF LEBANON

COUNCIL FOR DEVELOPMENT AND RECONSTRUCTION



ROADS AND EMPLOYMENT PROJECT (REP)

APRIL 2018

RESETTLEMENT POLICY FRAMEWORK (RPF)

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List of Acronyms

ARAP	Abbreviated Resettlement Action Plan
CDR	Council for Development and Reconstruction
DG	Directorate General
DGA	Directorate General of Antiquities
DPF	Displaced Peoples Fund
EIA	Environmental Impact Assessment
ELARD	Earth Link and Advanced Resources Development
EM	Environmental Management
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMMP	Environmental and Social Management and Monitoring Plan
ESMP	Environmental and Social Management Plant
GRM	Grievance Redress Mechanism
ICRC	International Committee of the Red Cross
IR	Involuntary Resettlement
IT	Information Technology
MoE	Ministry of Environment
MoIM	Ministry of Interior and Municipalities
MoPWT	Ministry of Public Works and Transport
MoSA	Ministry of Social Affairs
NGO	Non-Governmental Organization
OP	Operational Policy
OP/BP	Operational Policy/Bank Procedures
PAP	Project Affected Person
PIU	Project Implementation Unit
PMU	Project Management Unit
RAP	Resettlement Action Plan
REP	Roads and Employment Project

RPF	Resettlement Policy Framework
UNDP	United Nations Development Program
UNHCR	United Nations High Commissioner for Refugees
USD	United States Dollar
WB	World Bank

Glossary

<i>Terminology</i>	<i>Explanation</i>
Abbreviated Resettlement Plan	Establish a baseline through the census of PAPs that will comprise socio-economic data, the inventory of assets lost, and the compensation and resettlement benefits awarded to the PAPs.
Census	Household survey that covers all Project Affected Persons irrespective of entitlement or ownership. It provides a complete inventory of all project affected persons and their assets. It can be used to minimize fraudulent claims made by people who move into the area affected by the project in the hope of being compensated and/or resettled.
Compensation	Payment in cash or in kind to replace losses of land, housing income, and other assets caused by the project.
Cut-off Date	The date of the census prior to which, the occupation or use of the project area, qualifies residents or users of the project area as affected persons.
Environmental and Social Impact Assessment (ESIA)	A systematic procedure for enabling the possible environmental and social impacts of development projects to be considered before a decision is made as to whether the project should be given approval to proceed.
Full replacement cost	<p>Market value of land of equal productive potential or use located in the vicinity of the affected land, plus the cost of preparing the land to levels similar to those of the affected land, plus the cost of any registration and transfer taxes.</p> <p>For land in urban areas, it is the pre-displacement market value of land of equal size and use, with similar or improved public infrastructure facilities and services and located in the vicinity of the affected land, plus the cost of any registration and transfer taxes. For houses and other structures, it is the market cost of the materials to build a replacement structure with an area and quality similar to or better than those of the affected structure, or to repair a partially affected structure, plus the cost of transporting building materials to the construction site, plus the cost of any labor and contractors' fees, plus the cost of any registration and transfer taxes. In determining the replacement cost, depreciation of the asset and the value of salvage materials are not taken into account, nor is the value of benefits to be derived from the project deducted from the valuation of an affected asset. Where</p>

	domestic law does not meet the standard of compensation at full replacement cost, compensation under domestic law is supplemented by additional measures so as to meet the replacement cost standard.
Grievance Redressal Mechanism	Dispute resolving mechanism that is available at the project level for persons affected under the project to submit project related grievances and to seek redressal for these.
Involuntary Resettlement (IR)	The unavoidable displacement of people and/or impact on their livelihood, assets and common property resulting from development projects that create the need for rebuilding their livelihood, sources of income and asset bases.
Monitoring	The process of repeated observations and measurements of environmental and social quality parameters to assess and enable changes over a period of time.
Project Affected Person (PAPs) and Displaced persons	<p>Refers to all the people who, on account of the activities listed above, would have their (1) standard of living adversely affected ; or (2)right, title, interest in any house, land (including premises, agricultural and grazing land) or any other fixed or movable asset acquired or possessed temporarily or permanently; (3) access to productive assets adversely affected, temporarily or permanently; or (4)business, occupation, work or place of residence or habitat adversely affected; and “displaced person” means any of the displaced persons.</p> <p>Includes any people, households, firms or private institutions who, on account of changes that result from the project will have their (i) standard of living adversely affected, (ii) right, title, or interest in any house, land (including residential, commercial, agricultural, forest, and/or grazing land), water resources, or any other moveable or fixed assets acquired, possessed, restricted, or otherwise adversely affected, in full or in part, permanently ore temporarily; and/or (iii) business, occupation, place of work or residence, or habitat adversely affected, with or without displacement.</p>
Public Involvement	The dialogue encompassing consultation and communication between a project proponent and the public. It includes dissemination, solicitation and presentation of information
Rehabilitation/Resettlement	A term often used to describe the process of re-establishing lifestyles and livelihoods following resettlement. The term is

also used to describe construction works that bring a deteriorated structure back to its original conditions.

Resettlement Action Plan (RAP) A time-bound action plan with a budget, setting out resettlement strategy, objectives, options, entitlements, actions, approvals, responsibilities, monitoring and evaluation

Social Impact An effect (both positive and negative) on a social issue resulting from infrastructure development projects.

Stakeholders Those who have an interest in project development and who will be involved in the consultative process, and includes any individual or group affected by, or that believes it is affected by the project; and any individual or group that can play a significant role in shaping or affecting the project, either positively or negatively, including the host community/population.

Vulnerable Groups Distinct groups of people who might suffer excessively from resettlement effects, such as, the old, the young, the persons with disabilities, the poor, isolated groups and single parents.

Caza Geographical subdivision of the territory equivalent to the district level in Lebanon

Qaemmaqam Local Authority representative acting as the Head of the Caza or District

Executive Summary

The Syrian refugee crisis has resulted in unprecedented social and economic challenges to Lebanon. The conflict in Syria has brought 1.5 million Syrian refugees, placing Lebanon as the country with the highest number of refugees-per-capita in the world. This dramatic surge in population is putting a strain on the country's resources, public services, and infrastructure while affecting local communities who are already experiencing high levels of poverty. This high influx of Syrian refugees has also resulted in high increase in demand for mobility and access and has substantially increased the wear and tear of the road network and resulted in traffic increases in the range of 15 to 25 percent nationally.

The proposed Roads and Employment Project aims to support the Lebanese host communities and Syrian refugees through improvements in the roads sector, which are expected to enhance access while simultaneously creating short term job opportunities. The first phase is a US \$510 million program for roads rehabilitation and upgrade in the seven governorates in Lebanon, except Beirut. The proposed World Bank funded project of US \$200 million will be part of Phase I of the government program. The first phase of the program, estimated at US \$300 million, will be executed in three years and will focus on i) the rehabilitation and maintenance of existing roads, including road safety improvements; ii) the purchase of equipment for emergency roads works; and iii) capacity building in the sector.

This report presents the Resettlement Policy Framework (RPF) relating to the roads rehabilitation and maintenance component of the proposed World Bank funded project. Given that the activities financed under the latter component could require minor land acquisition and resettlement needs, some impacts might arise on squatters or encroachers on the rights of way or temporary impacts to land users in adjacent properties. In limited cases, minimal involuntary taking of land could also be required. Since the location of investments cannot be determined prior to project appraisal, the RPF is prepared based on the requirements and key principles of World Bank Policy on Involuntary Resettlement OP 4.12 and relevant Lebanese laws and regulations as a guideline for resettlement preparation and implementation, if there is any.

A gap analysis of the legal framework on resettlement adopted by the Government of Lebanon and the World Bank was conducted in this report in order to bridge the two frameworks together. Practical measures were proposed in the report in order to fill the gaps in the relevant Lebanese laws to become in line with the World Bank safeguard policies. In cases such as the extent of stakeholder consultation/participation in the resettlement process, payment of compensation, grievance redress mechanisms, squatters and encroachers which are different between the two entities, the requirements of the World Bank Policy on Involuntary Resettlement OP 4.12 will take precedence over the Lebanese regulations.

The purpose of the RPF is to set down the principles for resettlement impact mitigation, as well as to clarify the organizational arrangements that may be needed during project preparation and implementation phases. This includes compensating all project affected persons (PAPs) for the loss of lands, properties, and livelihoods resulting from displacement and resettlement, as well as assisting these people in relocation and rehabilitation. This framework shall cover all the project's activities and shall apply to all displaced persons regardless of the total number affected, the severity of impact, and whether or not the affected persons have legal title to the land.

The Project affected persons (PAPs) are defined in this policy framework as individuals who may be subjected to adverse economic, social, or cultural impacts by the proposed project. These impacts may constitute anything from the loss of physical assets to nonphysical assets such as social capital and cultural

networks and activities. Moreover, adverse impacts also include the loss of access to the physical and non-physical assets and the involuntary restriction of access to legally designated parks and protected areas.

Therefore, the RPF aims to establish the mechanisms by which the appropriate tools, screening checklists and Resettlement Action Plans (RAPs), will be implemented to mitigate potential social and economic impacts once project locations have been identified. Specific attention will be paid to vulnerable groups identified by a socio-economic survey including those who live below the poverty lines, the landless, and other very poor groups. Additionally, the elderly, women and children, indigenous peoples, ethnic minorities, and project affected persons who may not be protected through national land compensation legislation (including refugees, displaced persons, or other non-Lebanese citizens) shall be taken into account as well. However, all PAPs who suffer a complete or partial loss of assets or access to assets shall be eligible for some kind of assistance, as per the criteria set forth in this report for asset valuation and compensation.

In later stages of the project when the locations are identified, the Program Implementation Unit (PIU) within CDR will be responsible to carry out social screening to determine whether the project will result in any resettlement impact. In case the project will entail involuntary resettlement, the PIU will conduct a socio-economic study and census survey, in which baseline data within the project's target areas is collected, and accordingly prepare a RAP or an abbreviated RAP based on the number of PAPs and severity of the expected impacts.

The plans will need to be consulted upon, and once approved, they must be publicly disclosed in-country and at the Bank's external website before implementation. PAPs will have the chance to submit grievances and seek redress throughout the implementation and while project is active, according to a grievance redress mechanism devised for this project. The functioning of the GRM will be part of the reporting requirements on the project progress. It is important to note that all land and other assets acquisitions and RAP preparations shall be developed after consultation with the project-affected population (PAPs), tenants, residents, business owners affected, the concerned municipalities, NGOs and other representatives of civil society within the affected areas.

As part of the requirements in preparing this RPF report, ELARD conducted seven public consultation meetings, one in each of the governorates included within the scope of the project between 8 and 17 January 2018. Overall, 47 attendees were consulted, 16 of which were women (34%). During the meetings ELARD's consultants presented the project details, potential impacts and mitigation measures, and opened the floor for one (1) hour of open discussions with the attendees. During the questions and answers sessions, various issues of environmental, safety as well as social concerns were raised by the attendees. The main issues of concern raised during these public consultation sessions included the importance of coordination with the concerned municipalities, the coordination between the relevant public authorities, distribution of winter equipment/vehicles, and the involvement in project execution and studies.

On the other hand, and in line with WB requirements and procedures, the project will be subject to internal and external monitoring of the implementation of the resettlement activities to ensure transparency and effectiveness. Internal monitoring will be carried out by the CDR every three months; results and findings will be included in quarterly project progress reports. On the contrary, external monitoring will be carried out by an independent consultant, focusing on the implementation of the resettlement activities carried out by the CDR. The monitoring and evaluation process will be conducted according to pre-set key performance indicators that could be easily verified.

1 Introduction

1.1 Project background

The Syrian refugee crisis has resulted in unprecedented social and economic challenges to Lebanon. Over the past decades, Lebanon has been affected by recurrent domestic and regional conflicts that resulted in high economic and social costs. In spite of the country's resilience in weathering frequent internal and external shocks, the ongoing conflict in Syria has caused a tremendous increase in the number of refugees in Lebanon. While the country hosts 450,000 Palestinian refugees, the conflict in Syria has brought an additional 1.5 million Syrian refugees, placing Lebanon as the country with the highest number of refugees-per-capita in the world. This dramatic surge in population is putting a strain on the country's resources, public services, and infrastructure while affecting local communities who are already experiencing high levels of poverty. This situation, combined with the current political deadlock in Lebanon, poses the risk of destabilizing further the country's fragile political, social and economic situation.

The influx of Syrian refugees resulted in high increase in demand for mobility and access and has substantially increased the wear and tear of the road network and resulted in traffic increases in the range of 15 to 25 percent nationally.

The construction sector, including roads construction, has historically been a major employer for a large labor force of poor and low skilled Lebanese and Syrians, and provides employment opportunities that directly benefit local host and refugee communities. Moreover, substantial supply chain and indirect jobs are created in supporting industries and services (quarries, cement, trucking). The proposed project therefore aims to support Lebanese host communities and Syrian refugees through improvements in the roads sector, which are expected to enhance access while simultaneously creating short term job opportunities.

1.2 Project description

The proposed project is the first phase of a US \$510 million program for roads rehabilitation and upgrade in Lebanon. Lebanon road rehabilitation needs are estimated at over US \$1 billion and the government is determined to improve the condition of the network given its high importance for the development of regions and local economies as well as its local employment generation potential. The proposed World Bank funded project of US \$200 million will be part of Phase I of the government program.

The first phase of the program, estimated at US \$300 million, will be executed in three years and will focus on i) the rehabilitation and maintenance of existing roads, including road safety improvements; ii) the purchase of equipment for emergency roads works; and iii) capacity building in the sector.

Roads Rehabilitation and Maintenance: This component will primarily finance works for the rehabilitation and maintenance of about 450 km of primary, secondary, and tertiary roads, including road safety and spot improvements. Such works include asphalt overlays, drainage works, base and sub base reconstruction on selected sections, slope stabilization works, as well as roadside improvements on sections crossing towns (sidewalks, planting trees). Most road works will be within the existing right of way.

Improving Response Capacity to Emergency Road Works: This component will finance the purchase of road vehicles equipment for the benefit of the Ministry of Public Works and Transport to increase their capacity in dispatching the necessary equipment to deal with emergency road works, particularly those induced by climate conditions and extremes such as snow removal and landslides repairs.

Capacity building: This component will finance consultancy services, and related software and IT equipment, to support road asset management, the planning and implementation of road safety measures, training of workers and small contractors, and project implementation.

1.3 Rationale for the preparation of a resettlement policy framework (RPF)

Activities financed under the component on roads rehabilitation and maintenance could require minor land acquisition and resettlement. Impacts are expected to be small scale in nature, as investments will be carried out primarily on existing rights of way or on government-owned land. However, project implementation may result in impacts on squatters or encroachers on the rights of way or temporary impacts to land users in adjacent properties. In limited cases, minimal involuntary taking of land could also be required. Since the location of investments cannot be determined prior to project appraisal, this Resettlement Policy Framework (RPF) is prepared based on the requirements of World Bank Policy on Involuntary Resettlement OP 4.12 and relevant Lebanese laws and regulations as a guideline for resettlement preparation and implementation, if there is any.

2 Objectives and Key Principles

2.1 Objective of Framework

The purpose of the RPF is to set down the principles for resettlement impact mitigation, as well as to clarify the organizational arrangements that may be needed during project preparation and implementation phases. This includes compensating all project affected persons (PAPs) for the loss of lands, properties, and livelihoods resulting from displacement and resettlement, as well as assisting these people in relocation and rehabilitation. The RPF may be applied whenever any of the project's activities entail the acquisition of land and / or the displacement of people, causing the loss of land, property, assets, access (to land, property, and assets), income, or sources of livelihood.

This framework shall cover all the project's activities that could impact land permanently temperately, livelihoods during the roads rehabilitation and upgrading and shall apply to all displaced persons regardless of the total number affected, the severity of impact, and whether or not the affected persons have legal title to the land. Since resettlement often affects the most vulnerable and marginalized groups (economically, politically, and socially). The RPF shall guide the resettlement planning that will be particularly sensitive to the effects which displacement may have on these groups, including the poor, landless, elderly, women, children, ethnic minorities, or persons with specific mental or physical disabilities. Project activities that may give rise to resettlement include mainly asphalt overlays, drainage works, base and sub base reconstruction on selected sections, slope stabilization works, retaining walls, as well as roadside improvements on sections crossing towns (sidewalks, planting trees) Most road works will be within the existing right of way but in the event that these project activities do not take place within the existing right of way, resettlement impacts may arise in which case this RPF will be applied.

Every effort will be made to avoid or minimize the need for land acquisition and resettlement. In the unlikely and exceptional event that any of the activities financed under the project requires additional land, houses and other assets, or that activities have temporary or permanent impacts on livelihoods, this RPF will be implemented and a RAP prepared accordingly.

2.2 Key Principles

The principles outlined in the World Bank's OP/BP 4.12 have been adopted in preparing this RPF. In this regard the following principles will be applied:

- (a) Acquisition of land and other assets, and resettlement of people will be minimized as much as possible. Where land acquisition is unavoidable, the project will be designed to minimize adverse impact on the PAPs, especially those belonging to vulnerable groups;
- (b) All PAPs will be compensated, relocated and rehabilitated, if required, so as to improve their standard of living, income earning capacity and production capacity, or at least to restore them to pre-Project levels;
- (c) All PAPs residing in, or cultivating land, or having rights over resources within the subprojects areas are entitled to compensation for their losses and/or income rehabilitation. Lack of legal right to the assets lost will not bar the PAP from entitlement to such compensation, rehabilitation and relocation measures;
- (d) The rehabilitation measures to be provided are (i) compensation at full replacement cost for houses and other structures; (ii) compensation for land acquisition; (iii) dislocation allowance and transition subsidies; (iv) full compensation for crops, trees and other similar agricultural products at market value; and (v) other assets, and appropriate rehabilitation measures to compensate for loss of livelihood;
- (e) The preferred option is to replace land required by the project with equivalent land in a nearby/other suitable area (i.e., the “land-for-land” option). Land-for-land may be substituted by cash compensation provided that: (i) land is not available in the proximity of the subproject area; (ii) the PAP willingly accepts cash compensation for land and all assets on it; and receives full replacement value without any deductions for depreciation; and (iii) cash compensation is accompanied by appropriate rehabilitation measures which together with project benefits results in restoration of incomes to at least pre-subprojects levels;
- (f) Resettlement plans will be implemented following consultations with the PAPs, and will have the endorsement of the PAPs;
- (g) Any acquisition of, or restriction on access to resources owned or managed by PAPs as common property will be mitigated by arrangements ensuring access of those PAPs to equivalent resources on a continuing basis.
- (h) While calculating compensation value for assets, there will be no deduction of depreciation and salvage value. PAPs allowed to salvage materials. The valuation of losses in physical assets will be carried out by assessing the market value of the assets, if known, and estimating the replacement cost. Replacement cost is simply calculated as the cost of replacing the lost assets plus any transaction costs associated with bringing the asset to pre-displacement value, including administrative fees and taxes. However, the valuation of crops will be mainly relied upon the price lists developed by the Agriculture directorate and revisited annually.
- (i) PAPs will be consulted and offered choices among technically feasible resettlement options;
- (j) Ensure that a grievance redress mechanism (GRM) is available.

3 Legal Framework for Resettlement

Resettlement and land acquisition issues under the proposed Project will be addressed through relevant laws and regulations of the Government of Lebanon and the World Bank’s OP 4.12. The RPF represents the reference to be used in managing land acquisition issues and addressing the involuntary resettlement and displacement of people related to WB financed projects. The implementing agency (CDR) shall be committed to complying with the national laws and WB policies and to any future amendments to them.

3.1 Government of Lebanon Relevant Laws and Regulations

Lebanon's legislation provides the legal framework for the implementation of the entire project and its related sub-projects. It provides for expropriation only by due legal process and after compensation has been paid for all tangible losses of property and economic prejudice at current market rates or better; and it provides for a mechanism of appeal and review. The relevant laws and regulations are as follows:

Expropriation: Lebanese law protects the right of private property, including land. **Law No. 58**

enacted in 1991 authorizes the expropriation of private property in the public interest but only after fair compensation has been made. The compensation is determined through an assessment by an independent judicial committee and is always a monetary award, comprising two components: (i) identification of damage or loss to improvements (buildings, trees, fences etc.) and (ii) compensation for the value of the land. Under Lebanese Law, the expropriation is considered final unless the public interest claim is itself challenged by an individual directly affected (an association, municipality, NGO, etc., does not have the right to appeal).

A decree is published in the Government Official Gazette announcing and authorizing the expropriation with a timeline which should not exceed 8 years from the publication of the announcement. Annexed to the decree are the following: a) a sketch of the entire project area proposed; b) a detailed plan of the properties to be expropriated; c) a list showing the registration numbers of each property, its location, the names of all the owners and right holders in the Land Registry; and d) a detailed list of the immovable contents of the property as well as a detailed plan of buildings constructed prior to the date of the decree's publication. The complete document is made available for public access at the government offices. In addition, these documents are posted at the municipalities where the properties to be expropriated are located.

Compensation: Compensation is determined by an Expropriation Committee set up by a decree in accordance with proposals from the relevant ministers for each Mouhafaza. The members of the commission consist of (i) a chairperson (a judge or a magistrate of at least the 10th degree) (ii) an engineer and (iii) a property valuator. If the affected person is not satisfied with the compensation, he or she can appeal to a higher-level committee, the Appeal Committee, which consists of (i) a chairperson (a magistrate of at least the 6th degree) (ii) an engineer and (iii) an expert in land law and valuation. Each committee is assigned alternates for each of its members, as well as a clerk and a messenger.

The Expropriation Committee determines all compensation for any economic prejudice arising from expropriation, decides on requests by owners for total expropriation and full compensation, and determines the value of small portions of land which cannot be used for building and resolves disputes over the division of compensation between shareholders. Its awards are always based on prevailing local market rates.

The Expropriating Agencies for the proposed project will be the Expropriation Department of CDR, with the support of the PIU.

Land Tenure: In Lebanon there is generally little contestation over ownership, legal rights or boundaries of land because plots are generally well surveyed, and title is recorded at an administrative service based in the Ministry of Finance (with the exception of areas affected by uncontrolled movement and settlement due to the civil war). The survey unit also maintains cadastral maps that are regularly updated. Since land ownership is recorded in shares, along with all those who ever held title to it, the exact value of any transaction for an individual owner can be determined. In addition, land laws in Lebanon are gender neutral. However, the situation with regard to historic urban cores is much less clear, with informal land subdivisions not represented in the cadaster, and complex vertical layers that do not always correspond to horizontal boundaries. The project would therefore need to conduct careful and detailed empirical research, consultations, tailoring the project actions to the social realities on the ground if it were to carry out activities in urban centers.

Tenancy Laws: A new rent law enacted in 1991 relaxed rent control and gave the landlord the right to repossess the property at the end of the contract. Rent laws prior to 1992, however, permitted tenants automatically to renew their contracts and capped rent increases. Moreover, tenants could sublease the property to third parties with only minor increases in the rent at the signing of each new contract. As a result, rent contracts signed after 1991 favor the landlord and those signed previously favor the tenant.

Where expropriation causes loss of tenancy, expropriation commissions divide their awards between landlords and tenants according to the economic value of the tenancy, enabling tenants to secure alternative housing by rental or down payment against purchase.

Antiquities Laws: According to the Antiquities Law of 1933 historic monuments, even those on the General Inventory List, can be either publicly or privately owned. Although archaeological finds are considered state property, the parcels on which archaeological discoveries are made can remain the property of private individuals or institutions. Under this law, private property owners of listed historical buildings are responsible for the repair and maintenance of the structure. The discovery of important archaeological remains could also lead to the expropriation of private property or to limitations on its use. If a building is placed on the list of classified monuments, the owner receives no compensation for the freezing of development rights. However, if the listing is erroneous the owner may eventually be compensated. This disposition of the Antiquity Law would be contrary to the World Bank Policy on Involuntary Resettlement, however in this case although the discrepancy is mentioned, there is no case of this nature financed by the project.

Maritime Public Domain: Lebanese Law provides that the entire intertidal shore is public domain. This law has not been fully enforced. In some places, semi-permanent informal business structures have been erected. However, this project is not expected to finance activities in these domains.

Lebanese law provides for legal process: i) expropriation is affected after compensation has been determined and paid, ii) prior warning and public disclosure is made, iii) full judicial compensation is independently awarded, and iv) payment is transferred to a special account in a Bank and citizens can retrieve their payments, and v) citizens have the right to appeal. There are however, several sequencing features of Lebanese procedures which are commonly encountered in many countries that differ slightly from what the Bank documents anticipate. Expropriation is initiated by a ministerial decree and signed by the President with no prior public debate. However, informal public consultations may precede the decree. The compensation levels made through an independent judicial process are situation specific and cannot be known at the time of the RAP but may in some cases be estimated on the basis of known precedent.

The Lebanese law of expropriation only compensates those with legal rights. However, mechanisms exist that protect various forms of customary rights made on a case by case basis to the expropriation committee. In practice, since squatters cannot be evicted without an order from the governor, resettlement is most often done through amicable negotiation, by agreeing on a level of compensation or inducement that will encourage voluntary departure. Widespread displacement of people during the civil war led to a proliferation of squatting between 1975 and 1991. As part of the reconciliation process a Displaced Peoples Fund (DPF) was established to encourage squatters to return to their villages. However, since many did not wish to return to their respective villages, the DPF provides them with financial support to relocate wherever they choose. This project will follow Lebanese practice of humane treatment and amicable resolution of cases to avoid hardship where poor residents lack formal legal rights. However, the Displaced People's Fund is not involved in the Project.

Appeals Procedures: The decisions of the Expropriation Committee may be appealed to the Appeals Committee by either party (the CDR or the individual property owner, but not by public bodies, NGOs or municipalities) and the decisions of the Appeals Committee are binding on both parties. The appellant must be represented by a lawyer. The appeals fee is about USD 125 (including stamp and insurance fees to initiate the appeal) plus 3.5 % of the increased compensation amount demanded in the appeals case. Appeals Committee may make upward adjustments in the level of compensation awarded and must make a decision within three months of the lodging of the appeal. This appeals process might be too onerous for project affected people, especially in poor areas where average monthly family income is around \$200. Hence it is important to set up a robust grievance and redress mechanism upstream from the appeals mechanism.

Payment of compensation: Where there is an appeal, at least 65% (sixty five) of the compensation is paid in advance, and if no structures are found to be existing within expropriation limits, an additional 25% are paid and the expropriation party reserves the right (only if it wishes so) to hold the remaining 10% till the decision of takeover is issued, but the process of expropriation itself cannot be halted unless the validity of the public interest decree itself is challenged. To fill in this gap, CDR will ensure that no land will be taken over under this project without full prior payment of compensation.

3.2 World Bank Safeguard Policies

The WB's policy on Involuntary Resettlement OP 4.12 sets forth all the resettlement requirements and principles which will be well considered and fully applied in the proposed project.

According to WB's OP4.12, to address the involuntary taking of land, a resettlement plan or a resettlement policy framework are to be prepared by the borrower and should include the following principles:

- (a) the resettlement plan or resettlement policy framework includes measures to ensure that the displaced persons are:
 - (i) Informed about their options and rights pertaining to resettlement
 - (ii) Consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives; and
 - (iii) Provided prompt and effective compensation at full replacement cost for losses of assets attributable directly to the project.
- (b) If the impacts include physical relocation, the resettlement plan or resettlement policy framework includes measures to ensure that the displaced persons are:
 - (i) Provided assistance (such as moving allowances) during relocation; and
 - (ii) Provided with residential housing, or housing sites, or, as required, agricultural sites for which a combination of productive potential, locational advantages, and other factors is at least equivalent to the advantages of the old site.
- (c) Where necessary to achieve the objectives of the policy, the resettlement plan or resettlement policy framework also include measures to ensure that displaced persons are:
 - (i) Offered support after displacement, for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standards of livings; and
 - (ii) Provided with development assistance in addition to compensation measures, such as land preparation, credit facilities, training, or job opportunities.

3.3 Policy Gaps

Consultation and participation. According to OP 4.12, PAPs should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs. It further requires that the resettlement process include measures to ensure that the PAPs are consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives. However, there are no clear requirements in relevant Lebanese laws and regulations on consultation with and participation of affected persons in the planning and implementation of the resettlement program.

Loss of income and livelihood. OP 4.12 makes provisions for loss of income sources or means of livelihood, whether or not the affected persons must move to another location. It requires that PAPs should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. In this regard the Lebanese laws do not have clear provision for restoring loss of income sources or means of livelihood.

Squatters and encroachers. Squatters and encroachers in occupation or use of land before project initiation are likely to have invested in structures or land improvements that are eligible for compensation. OP 4.12 states that those without legal title to affected land may be compensated for their structures and may qualify for other resettlement and rehabilitation assistance, including livelihoods restoration assistance. While the Bank’s involuntary resettlement policy is explicit on the compensation entitlement to people without title or use of rights, the Lebanese laws are less clear on the issues of compensation payments for illegal occupation or use of registered properties.

3.4 Gap Filling Measures

In some cases, Lebanese laws may differ from World Bank rules and regulations. This may be the case with regard to the extent of stakeholder consultation/participation in the resettlement process, payment of compensation, grievance redress mechanisms, squatters and encroachers. In all these cases the requirements of the World Bank Policy on Involuntary Resettlement OP 4.12, as outlined in the following sections, will take precedence over the Lebanese regulations. Table 3-1 includes detail information regarding these gaps.

Table 3-1: Comparison of Lebanese laws and regulations with the World Bank policies

Topic	Lebanese legislative requirements	World Bank policies	Practical measures to fill the gaps
The cut-off date	There is no cut-off date under the Lebanese laws. Under law number 58 that authorizes the expropriation of private property in the public interest the Government Official Gazette announcing and authorizing the expropriation with a timeline which should not exceed 8 years from the publication of the announcement. This announcement could be the date after which the land is considered public but does not consider the cut-off date	The WB identifies a cut-off date in order to prevent people influx to the project area. This measure is stipulated in order to protect the project owner and to prevent wasting of resources. The Lebanese laws never set a cut-off date. The cut-off date is the day the census starts.	. The cut-off date will be the day when the census starts for the preparation of the site-specific RAPs.
Monitoring and Evaluation	Monitoring or evaluation (M&E) measures are not stipulated in Lebanese regulation. Lack of the necessary legal provision needed to put in place for monitoring and evaluation measures can negatively impact the accountability and	Under OP 4.12 the projects including resettlement or land acquisition need to follow up the implementation of the measures through monitoring and evaluation, both internally and through an independent party.	The RAP will include a M&E section that will explain the mechanisms and indicators for the monitoring of the resettlement activities during the project implementation as detailed in this RPF.

Topic	Lebanese legislative requirements	World Bank policies	Practical measures to fill the gaps
	transparency of the programs.		
Resettlement planning and procedural requirements	There is presently no requirement to prepare a formal Resettlement Action Plan (RAP) under the Lebanese law, nor to undertake any of the component activities of a resettlement action plan such as, a ‘census’, socio-economic survey, consultation with project affected people, monitoring or reporting. Moreover, there are no specific references in the legislation to ‘involuntary resettlement’. Also, there is no explicit consultation requirement in the Lebanese law.	When there is impact on land and livelihoods as a result of a WB funded project, the project requires to prepare a formal Resettlement Action Plan (RAP). In order to prepare the RAP, it is necessary to undertake the component activities of a resettlement action plan such as, a ‘census’, socio-economic survey, consultation with project affected people, monitoring or reporting.	A screening will need to be conducted to determine whether a RAP should be prepared. Once this is determined the Council for Development and Reconstruction in compliance with the WB procedures should prepare site-specific Resettlement Action plans when and if needed. In addition, the consultation activities will be implemented throughout the project life-cycle and as part of the preparation of the RAPs. To determine the need for possible RAPs CDR will conduct a preliminary survey of the selected sites.
Compensation eligibility	Under Lebanon only those with legal title are entitled for compensation. In Lebanon there is generally little contestation over ownership, legal rights or boundaries of land because plots are generally well surveyed and title is recorded at an administrative service based in the Ministry of Finance (with the exception of areas affected by uncontrolled movement and settlement due to the civil war). The	<ul style="list-style-type: none"> • Eligibility Criteria for compensation under OP 4.12: <ul style="list-style-type: none"> (a) those who have formal legal rights to land (including customary and traditional rights recognized under the laws of the country); (b) those who do not have formal legal rights to land, at the time the census begins, but have a claim to such land or assets; provided that such claims are recognized under the laws of the country or become recognized 	<p>The categories of people who must be compensated under Lebanese legislation are narrower than those defined under OP 4.12.</p> <p>Under this project all the categories (A, B, C) will be considered for compensation in accordance to OP4.12.</p> <p>To address the issue related to the historical urban cores, the project will conduct careful and detailed empirical research, consultations, tailoring the project actions to the social realities on the ground if it were to carry out activities in urban centres.</p>

Topic	Lebanese legislative requirements	World Bank policies	Practical measures to fill the gaps
	<p>survey unit also maintains cadastral maps that are regularly updated. Since land ownership is recorded in shares, along with all those whoever held title to it, the exact value of any transaction for an individual owner can be determined. In addition, land laws in Lebanon are gender neutral. However, the situation with regard to historic urban cores is much less clear, with informal land subdivisions not represented in the cadaster, and complex vertical layers that do not always correspond to horizontal boundaries</p>	<p>through a process identified in the resettlement plan;</p> <p>(c) Those who have no recognizable legal right or claim to the land they are occupying.</p> <ul style="list-style-type: none"> • To determine eligibility: • Carry out resettlement census. Cut-off date for eligibility is the day when the census begins. • Under the OP 4.12 all the land needed for a project is subject to compensation 	<p>Resettlement assistance should be provided in order to improve the PAPs livelihoods or at least to restore to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.</p> <p>Accordingly, individuals under category a and b, should be compensated at full replacement cost and WB requires payment prior to acquisition.</p> <p>While those who are using land but have no recognizable legal rights or claim (i.e. individuals under category c) will be compensated for their investments on the land in order to improve their livelihoods or at least to restore to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.</p>
Provisions for squatters and land users	<p>Lebanese legislations do not make provision for people with no legal title, although there have been some cases where practice on the ground has differed from the legislation. This practice on the ground should adhere to the World Bank OP 4.12; but as it is not in law, it is conducted on a discretionary case-by-case basis and is not systematically monitored.</p>	<ul style="list-style-type: none"> • Those who have no recognizable legal right or claim to the land are provided resettlement assistance in lieu of compensation for the land they occupy, and other assistance, as necessary in a way that they are not worse off from before. • Also the core of OP 4.12 is that people should not be worse off as a result of WB funded project and their livelihoods should be restored regardless of the legality of the ownership. 	<p>All project affected persons should be compensated for their loss of assets, regardless of their legal status. Compensation includes financial or technical support so that PAPs are able to restore their livelihood to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.</p>
Income restoration	<p>Lebanese laws recognize the income from land or assets from the owners, however it is not clear</p>	<p>Under the OP 4.12, loss of income resulting directly from project implementation should be compensated for.</p>	<p>Lebanese law does not discuss compensation for loss of income, only land and assets. Hence, OP4.12 principle regarding</p>

Topic	Lebanese legislative requirements	World Bank policies	Practical measures to fill the gaps
	about the restoration of income or livelihoods.	OP 4.12 makes provisions for loss of income sources or means of livelihood, whether or not the affected persons must move to another location. It requires that PAPs should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. In this regard the Lebanese law has not made clear provision for restoring loss of income sources or means of livelihood.	income restoration will be considered. Therefore, those whose income is going to be affected will be compensated for the loss of profit and income.
Disclosure	The Lebanese laws do not have any requirement for disclosure of resettlement documents	The OP 4.12 requires the provision of the relevant draft resettlement instrument which conforms to this policy and makes it available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that is understandable to them. Once the Bank accepts this instrument as providing an adequate basis for project appraisal, the Bank makes it available to the public through its Bank's external website. After the Bank has approved the final resettlement instrument, the Bank and the borrower disclose it again in the same manner	Providing information to, and consulting with, affected persons is essential to a process intended to enable affected persons to adapt to changed living conditions following land acquisition or resettlement. OP 4.12 requires borrowers/implementing agency to consult with affected persons during the RAP preparation process, and, through monitoring or other means, throughout the resettlement implementation period. The RAP, in draft and final versions, is disclosed in a manner accessible to affected persons.
Grievance Mechanisms	The Lebanese laws provide for formal appeal if the PAPs not agree with the compensation. However, there is no provision for	The O.P. 4.12 requires the creation of procedures that are free and easy to access by the affected people and communities. This GM is set up to address the	The absence of a project level grievance mechanism in the Lebanese law means there are difficulties to access grievance mechanisms addressing minor

Topic	Lebanese legislative requirements	World Bank policies	Practical measures to fill the gaps
	a Grievances System under the project.	grievances and disputes related to land acquisitions and livelihood..	<p>issues that otherwise should be resolved within a short period of time. To address this GM that will be accessible, easy to use will be established under the project. This allows PAPs to have access to direct channels to voice their grievances in an appropriate time prior to resettlement.</p> <p>In order to avoid delay in dispute resolution, it is essential for the implementing agency to establish a GRM that is acceptable, easy to use, and free. This GRM will serve as the first stop for people who have a grievance. All complains and concerns will be listened, documented and responded to and a due procedure of handling and managing grievances will be set.</p> <p>To have accessible GRM the information of where and how to lodge complain will be posted on CDR website as well a billboard/projects at construction sites in both English and Arabic.</p> <p>PAPs should be informed that they can take the case to the court If need arises. Aggrieved people would however remain free to open a Court case without having registered their grievance with the GRM.</p>
Consultation	There is no explicit consultation requirement in the Lebanese law. However, people in the affected communities are usually informed about the project.	<ul style="list-style-type: none"> Under OP 4.12 the affected communities and individuals should be consulted and contribute to the processes of land 	<p>Affected groups should have access to full information about the resettlement process and options for compensation.</p> <p>Participatory planning and decision making should be</p>

Topic	Lebanese legislative requirements	World Bank policies	Practical measures to fill the gaps
		acquisition and resettlement. <ul style="list-style-type: none"> • Consultation with the affected PAP should be documented. 	applied in resettlement options and compensation. Consultation is a continuous process that will be done in the affected communities throughout the project implementation and be documented.

4 Estimated Resettlement Impacts

4.1 Estimation of PAP Population

As the project locations have not yet been determined, it is difficult to estimate the number or likelihood of people to be negatively impacted by the project at this stage. Therefore, the purpose of this RPF is to establish the mechanisms by which the appropriate tools, screening checklists and Resettlement Action Plans (RAPs), will be implemented to mitigate potential social and economic impacts once project locations have been identified.

4.2 Vulnerable Groups

Specific attention should be paid to the needs of the following vulnerable groups, including:

- Persons below the poverty line, the landless, and other very poor groups;
- Elderly, women and children, indigenous peoples, ethnic minorities, and so on;
- Project affected persons who may not be protected through national land compensation legislation (including refugees, displaced persons, or other non-Lebanese citizens).

Vulnerable people will be identified at the socio-economic survey stage. Each RAP developed under the project will make precise provisions with respect to identifying and assisting vulnerable groups which include:

- Identification of vulnerable people and identification of the cause and impacts of their vulnerability, through direct interviews by the municipalities; this step is critical because vulnerable people often do not participate in community meetings, and their disability/vulnerability may remain unknown,
- Identification of required assistance at various stages of the process: negotiation, compensation, moving, livelihood restoration, etc.
- Implementation of the measures necessary to assist the vulnerable persons, which can include assistance with moving if needed, rebuilding, ensuring their access to GM, and helping them during the project implementation. The details and types of assistance will be in the RAP once based on the socioeconomic survey the different vulnerabilities and respective needs to address them are identified. Depending on the number of vulnerable groups, the PMU will engage a social worker or an NGO to assist the vulnerable during the transition and project implementation.
- Monitoring and evaluating continuation of assistance after resettlement and/or compensation took place.

5 Eligibility Criteria for Affected Persons

5.1 Defining Affected Persons

Project affected persons (PAPs) are defined in this policy framework as individuals who may be subjected to adverse economic, social, or cultural impacts by the proposed project. These impacts may constitute anything from the loss of physical assets such as land, farm lands, crops, commercial properties, homes, personal belongings, sources of income, and cultural / historical / religious sites, to nonphysical assets such as social capital and cultural networks and activities. Moreover, adverse impacts also include the loss of access to the physical and non-physical assets and the involuntary restriction of access to legally designated parks and protected areas. Highlights some of the key losses that may arise from land acquisition.

Table 5-1: Possible Losses from Land Acquisition

Land	<ul style="list-style-type: none"> ▪ Agricultural land (rented or owned) ▪ Access to land
Structures	<ul style="list-style-type: none"> ▪ Houses or living quarters (rented or owned) ▪ Other physical structures (rented or owned)
Income/Loss of Livelihood	<ul style="list-style-type: none"> ▪ Income from crops ▪ Income from wage earnings ▪ Income from fishing areas ▪ Income from affected business ▪ Access to formal employment opportunities
Communal ¹	<ul style="list-style-type: none"> ▪ Public Schools ▪ Public Hospitals ▪ Markets ▪ Community centers ▪ Cemeteries ▪ Social capital: networks, activities, relationships
Religious and Cultural ²	<ul style="list-style-type: none"> ▪ Religious shrines ▪ Worship areas (mosque, church, synagogue) ▪ Cultural, historical, sites
Environmental	<ul style="list-style-type: none"> ▪ Access to natural resources ▪ Negative environmental impacts resulting from land acquisition or from the p

5.2 Eligibility Criteria

All PAPs who suffer a complete or partial loss of assets or access to assets shall be eligible for some kind of assistance, according to their legal rights to the land, if it can be proven that they occupied the land before the claim cut-off date. The Bank OP4.12 specifically proposes three general categories for eligibility as illustrated in Table 5-2.

¹ The sub-projects should not be permitted to infringe on or damage in any way public cemeteries or private graveyards or graves physical assets. If extremely necessary, such cases shall be subject to the laws of the Government of Lebanon to this regard.

² The sub-projects should not be permitted to infringe on or damage in any way religious or cultural physical assets. If extremely necessary, such cases shall be subject to the laws of the Government of Lebanon to this regard.

Table 5-2: Criteria for Eligibility (OP 4.12)

Displacement Category	Entitlement / Compensation
Individuals who have formal legal rights to land (including customary and traditional rights recognized under the laws of Lebanon)	<ul style="list-style-type: none"> ▪ Compensation for loss in land and assets at full replacement cost. ▪ In case of physical relocation, provide assistance during relocation (i.e. moving allowances) and residential housing and / or agricultural sites with productive and location advantages equivalent to the lost sites. ▪ Support after displacement, until livelihoods and standards of living are restored to pre-displacement levels. ▪ Development assistance in addition to compensation measures (i.e. land preparation, credit facilities, training, job opportunities).
Individuals who do not have formal legal rights to land, but have a claim to such land or assets (provided that such claims are recognized under Lebanese laws or become recognized through a process identified in the resettlement plan)	<ul style="list-style-type: none"> ▪ Compensation for loss in land and assets at full replacement cost. ▪ In case of physical relocation, provide assistance during relocation (i.e. moving allowances) and residential housing and / or agricultural sites with productive and locational advantages equivalent to the lost sites. ▪ Support after displacement, until livelihoods and standards of living are restored to pre-displacement levels. ▪ Development assistance in addition to compensation measures (i.e. land preparation, credit facilities, training, job opportunities).
Individuals who have no recognizable legal right or claim to the land they are occupying (i.e. squatter settlements, disputed ownership).	<ul style="list-style-type: none"> ▪ Compensation for loss in assets at full replacement cost. ▪ Resettlement assistance as appropriate (i.e. land, assets, cash, moving allowances, employment, etc.) until livelihoods and standards of living are restored to pre-displacement levels. ▪ Development assistance in addition to compensation measures (i.e. land preparation, credit facilities, training, job opportunities).
Individuals or groups who may be disadvantaged or “vulnerable”, especially those below the poverty line, the landless, the elderly, women and children, indigenous peoples, ethnic minorities, or other displaced persons who may not be protected through national land compensation legislation.	<ul style="list-style-type: none"> ▪ In addition to the compensation per their eligibility as described above, the vulnerable groups are entitled to differentiated measures so that adverse impacts do not fall disproportionately on the them and/or not disadvantaged in sharing any development benefits and opportunities resulting from the project ▪ Ensure that displacement or restriction of access does not occur before necessary measures for resettlement are in place

It is to be noted that as per WB OP. 4.12, persons who encroach on the area after the cut-off date are not entitled to compensation or any other form of resettlement assistance. The cut-off date will be established in the respective resettlement instruments selected for the sub-projects (Table 3-1).

6 Method of Valuation of Affected Assets and Compensation

6.1 Asset Valuation

The valuation of losses in physical assets will be carried out by assessing the market value of the assets, if known, and estimating the replacement cost. Replacement cost is simply calculated as the cost of replacing the lost assets plus any transaction costs associated with bringing the asset to pre-displacement value. However, the valuation of crops will be mainly relied upon the price lists developed by the

Agriculture directorate and revisited annually. Replacement cost will differ depending on the type of asset, as illustrated in Table 6-1.

Table 6-1 Replacement Cost for Tangible Assets

Asset	Replacement Cost
Agricultural Land	Equals the pre-project or pre-displacement, whichever is higher, market value of land of equal productive potential or use located in the vicinity of the affected land, plus the cost of preparing the land to levels similar to those of the affected land, plus the cost of any registration and transfer taxes.
Urban Land	Equals the pre-displacement market value of land of equal size and use, with similar or improved public infrastructure facilities and services and located in the vicinity of the affected land, plus the cost of any registration and transfer taxes.
Houses / Other Structures	Equals the market cost of the materials to build a replacement structure with an area and quality similar to or better than those of the affected structure, or to repair a partially affected structure, plus the cost of transporting building materials to the construction site, plus the cost of any labor and contractors' fees, plus the cost of any registration and transfer taxes.

Source: WB OP 4.12

For intangible losses that cannot easily be valued in monetary terms (i.e. access to employment opportunities, public services, natural resources, social capital), the subprojects should attempt to establish access to equivalent resources and earning opportunities that are acceptable to the PAPs, and if this is not possible, should establish a fair compensation amount that considers the value of the loss from the time it occurs until the PAP can reasonably be expected to have replaced the lost income, asset, or access.

6.2 Compensation

Compensation will be provided to all individuals whose assets or access to assets is affected or damaged, as a consequence of land acquisition or any other activities undertaken by the projects. The compensation for the loss of physical and nonphysical assets will vary depending on the type of loss, and eligibility of the PAPs. Compensation may come in the form of cash compensation, in-kind compensation, and/or assistance.

All PAPs will be entitled to monetary compensation at replacement cost, at market value (at the entitlement cut-off date) for affected tangible assets. Another option may be in-kind compensation where the affected assets would be replaced with an asset of similar size, value, and quality. The decision on which type of compensation is used should be jointly agreed upon between the project staff and the PAPs and shall be subject to the availability of replaceable assets. Moreover, development and resettlement transitional assistance needed to restore the livelihood and standard of living of PAPs under the subproject to pre-project levels shall also be part of the compensation component of any resettlement plan (i.e. short-term jobs, subsistence support, moving allowance, salary maintenance, food assistance, etc.).

It should be noted here that compensation for losses in communal property shall only be in-kind for the

community as a whole, and shall take the form of reconstruction of the affected or damaged facility (i.e. public school buildings, markets, etc.) to - at least - the same standard it was on prior to the project's implementation (Table 6-2).



Table 6-2 Entitlement Matrix

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Recommendations
Agricultural Land				
Loss of arable and grazing agricultural land or access to it	Permanent (complete or partial) loss of arable and grazing land located in the sub-project site	Farmers/Individuals who have formal legal ownership rights to land	<ul style="list-style-type: none"> • Offer of replacement land with the same production value and capacity within the same geographical location. • Provide cash compensation at replacement cost for the lost land at the market price³, inclusive of the cost of preparing the land to levels similar to those of the affected land as well as the cost of any registration and transfer taxes. • Provide cash compensation for loss of crops or trees at replacement cost. 	<ul style="list-style-type: none"> • A list of available arable and grazing land in each affected municipality • Consultations and formal agreement with PAPs on type of compensation (cash or in-kind) • If available and requested by the PAPs and agreed to by the sub-project and concerned authorities: provide equivalent land nearby, of similar size, value, and quality • In case of relocation, provide assistance to farmers during and after the relocation process • Provision of assistance to farmers to develop new crops and improve production for both crops and livestock • Poor and vulnerable PAPs (including the landless) will not be displaced until replacement land is provided • For the transitional period, it is recommended that: Transitional assistance should be provided at least six months are provided if not more for all PAPs. Market value of the crops should be considered
Loss of arable and grazing agricultural land or access to it	Permanent (complete or partial) loss of arable and grazing land located in the sub-project site	Farmers/Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights	<ul style="list-style-type: none"> • Provide development and transitional assistance in locating new replacement lease land. • Provide cash compensation for loss of crops or trees at replacement cost. 	

³Calculated at entitlement cut-off date.

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Recommendations
Loss of arable and grazing agricultural land or access to it	Permanent (complete or partial) loss of arable and grazing land located in the sub-project site	Farmers/Individuals who do not have any recognizable legal right or claim to the land	<ul style="list-style-type: none"> • No compensation for land. • Provide landless PAPs with resettlement assistance in securing temporary or lease rights to replacement land • Provide cash compensation for loss of crops or trees at replacement cost. 	Which is calculated based on besides the transitional cycle of re-growing the same type of crop, plus cost involved.
Loss of arable and grazing agricultural land or access to it	Temporary (complete or partial) loss of all or part of arable and grazing land located in the sub-project site	Farmers/Individuals who have formal legal ownership rights to land	<ul style="list-style-type: none"> • No compensation for land if returned to owner in less than one year. • Provide cash compensation equivalent to the replacement cost at market price of renting the land during the temporary use. • Provide cash compensation for loss of crops or trees at replacement cost and compensation for loss of net income from subsequent crops that cannot be planted for the duration of the lease. 	<ul style="list-style-type: none"> • If the temporary loss continues for more than one year, PAPs will be given a choice of either continuing with the temporary arrangements, or selling the affected land to the sub-project at full replacement cost at current market value • Provision of development assistance to enable farmers/land owners to restore land to its previous condition or better quality by providing measures to improve land quality in cases of land being adversely affected.
Loss of arable and grazing agricultural land or access to it	Temporary (complete or partial) loss of all or part of arable and grazing land located in the sub-project site	Farmers/Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights	<ul style="list-style-type: none"> • No compensation for land if returned to owner in less than one year. • Provide cash compensation equivalent to the replacement cost at market price of renting the land during the temporary use. 	

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Recommendations
			<ul style="list-style-type: none"> • Provide cash compensation for loss of crops or trees at replacement cost and compensation for loss of net income from subsequent crops that cannot be planted for the duration of the lease. 	
Loss of arable and grazing agricultural land or access to it	Temporary (complete or partial) loss of all or part of arable and grazing land located in the sub-project site	Farmers/Individuals who do not have any recognizable legal right or claim to the land	<ul style="list-style-type: none"> • No compensation for land if returned to owner in less than one year. • Provide cash compensation for loss of crops or trees at replacement cost. 	<ul style="list-style-type: none"> • Provision of development and resettlement assistance to landless PAPs with no legal rights.
Urban Land (Residential and/or Commercial)				
Loss of urban residential or commercial non-arable land or access to it	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who have formal legal ownership rights to land	<ul style="list-style-type: none"> • Provide cash compensation at replacement cost of land of equal size and use, with similar or improved public infrastructure facilities and services and located in the vicinity of the affected land, plus the cost of any registration and transfer taxes. • In the case that there are structures on the land, provide cash compensation at replacement cost for the materials used to rebuild the structures or to partially repair an affected structure. 	<ul style="list-style-type: none"> • A list of available non-arable land in each affected municipality • A list of PAP and entitled persons • Consultations and formal agreement with PAPs on type of compensation (cash or in-kind) • If available and requested by the PAPs and agreed to by the sub-project and concerned authorities: provide equivalent land nearby, of similar size, value, and quality • Provision of development and resettlement assistance, mainly in form of transition allowances for severely affected PAPs (transition subsistence allowance for food,

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Recommendations
Loss of urban residential or commercial non-arable land or access to it	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights	<ul style="list-style-type: none"> • In the case where there are structures on the land which have been built by the users, provide cash compensation at replacement cost for the materials used to rebuild the structures or to partially repair an affected structure. • Provide development and transitional assistance in locating new replacement lease land 	<p>moving incentive allowance, assistance in locating new residential or commercial leasing, and income transition allowance if businesses are affected).</p> <ul style="list-style-type: none"> • For the transitional period, it is recommended that: Transitional assistance should be provided at least six months are provided if not more for all PAPs.
Loss of urban residential or commercial non-arable land or access to it	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have any recognizable legal right or claim to the land	<ul style="list-style-type: none"> • Provide no compensation for land. • In case that there are structures on the land which have been built by the users, provide cash compensation at replacement cost for the materials used to rebuild the structures or to partially repair an affected structure. • Provide landless PAPs with resettlement and transitional assistance to secure alternative commercial or residential land and to restore their livelihoods. 	

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Recommendations
Loss of urban residential or commercial non-arable land or access to it	Temporary (complete or partial) loss of urban residential or commercial non-arable land	Individuals who have formal legal ownership rights to land	<ul style="list-style-type: none"> • No compensation for land if returned to owner in less than one year. • Provide cash compensation equivalent to the replacement cost at market price of renting the land during the temporary use • Provide cash compensation for loss of crops, trees, or structures at replacement cost 	<ul style="list-style-type: none"> • If the temporary loss continues for more than one year, PAPs will be given a choice of either continuing with the temporary arrangements, or selling the affected land to the sub-project at full replacement cost at current market value • Provision of assistance to enable the land users owners to restore land to its pre-subproject condition by providing measures to improve land quality in cases where land is adversely affected
Loss of urban residential or commercial non-arable land or access to it	Temporary (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights	<ul style="list-style-type: none"> • No compensation for land if returned to owner in less than one year. • Provide cash compensation equivalent to the replacement cost at market price of renting the land during the temporary use • Provide cash compensation for loss of crops, trees, or structures at replacement cost 	
Loss of urban residential or commercial non-arable land or access to it	Temporary (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have any recognizable legal right or claim to the land	<ul style="list-style-type: none"> • No compensation for land if returned to owner in less than one year. • Provide cash compensation for loss of crops, trees, or structures at replacement cost 	<ul style="list-style-type: none"> • Provision of resettlement assistance to landless PAPs with no legal rights
Structures or Buildings (Commercial, Business, Industrial, or Residential)				

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Recommendations
Loss of structures or access to them	Permanent (complete or partial) loss of structures	Individuals who have formal legal ownership rights to the structures	<ul style="list-style-type: none"> • Provide cash compensation at replacement cost which is equal to the market cost of materials used to build a replacement structure of similar area and quality, or to repair a partially affected structure, in addition to the cost of transporting building materials to the construction site, plus the cost of any labor and contractors' fees, and the cost of any registration and transfer taxes. 	<ul style="list-style-type: none"> • A list of available structures in each affected municipality • A list of PAP and entitled persons • Consultations and formal agreement with PAPs on type of compensation (cash or in-kind, i.e. relocation)
Loss of structures or access to them	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights (tenants)	<ul style="list-style-type: none"> • Provide assistance in moving and finding similar and affordable rental accommodation (this may include moving allowance and rental allowance for a transitional period). 	<ul style="list-style-type: none"> • A 3-months' notice - at least - to be given to the tenants.
Loss of structures or access to them	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have any recognizable legal right or claim to the land (squatters and persons in ownership dispute)	<ul style="list-style-type: none"> • Provide cash compensation at replacement cost for the structures if they were built by the users. • Provide assistance in moving and finding similar and affordable rental accommodation (this may include moving allowance and rental allowance for a transitional period). 	<ul style="list-style-type: none"> • The Environmental and Social Officer may look into the possibilities of formalizing the structures following their repair.
Standing Crops, Trees, and Plants				

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Recommendations
Loss of standing crops, trees, or plants or access to them	Permanent (complete or partial) loss of standing crops, trees, or plants	Farmers or individuals who cultivate the land and who have formal legal ownership rights to the land on which the crops are planted	<ul style="list-style-type: none"> Provide cash compensation for loss of crops, trees, or plants at replacement cost. 	<ul style="list-style-type: none"> A comparative list of the prices of agricultural products in local markets. A list of tree and plant species in the municipality area. The sub-project activities should take into consideration the cropping patterns and seasons in order to avoid partial or complete loss if possible.
Loss of standing crops, trees, or plants or access to them	Permanent (complete or partial) loss of standing crops, trees, or plants	Farmers or individuals who do not have formal legal ownership rights to land on which the crops are planted but have temporary or leasing rights (tenants)	<ul style="list-style-type: none"> Provide cash compensation for loss of crops, trees, or plants at replacement cost. 	
Loss of standing crops, trees, or plants or access to them	Permanent (complete or partial) loss of standing crops, trees, or plants	Farmers or individuals who do not have any recognizable legal right or claim to the land on which the crops are planted	<ul style="list-style-type: none"> Provide cash compensation for loss of crops, trees, or plants at replacement cost. 	
Income or Access to Income (Commercial, Business, and Industrial Activities)				
Loss of source of income or access to source of income	Permanent loss of income source or access to it	Owner or workers in formal registered businesses	<ul style="list-style-type: none"> Provide transitional cash compensation until new permanent employment is secured based on net income (at least six months are provided if not more). Provide development assistance to PAPs (i.e. training in specific areas) in order to help them to maintain and/or improve their 	<ul style="list-style-type: none"> A list of available commercial, industrial, and business activities in each affected municipality A list of PAP and entitled persons. The Environmental and Social Officer shall assist in the provision of development assistance to severely affected PAPs and vulnerable groups as specific attention should be paid to the needs of the following vulnerable groups, including:

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Recommendations
Loss of source of income or access to source of income	Permanent loss of income source or access to it	Owner or workers in informal not registered businesses	<p>income generation potential and access to gainful employment.</p> <ul style="list-style-type: none"> • Provide transitional cash compensation until new employment is secured based on minimum wage per month in the respective district (at least six months are provided if not more) • Priority shall be given to severely affected PAPs in the provision of any relevant employment in the activities related to the sub-project. 	<p>i) Persons below the poverty line, the landless, ii) Elderly, women and children, indigenous peoples, ethnic minorities, iii) Project affected persons who may not be protected through national legislation. iv) persons with disabilities</p> <p>The RAPs will include these vulnerable groups and take into consideration their individual circumstances. Subsequently, the provision of development assistance to severely affected PAPs and vulnerable groups will be through design training programs, formalizing informal activities, and access to credit.</p> <ul style="list-style-type: none"> • If the transitional cash compensation 6-month period expires without the PAPs having restored their living standard, then the period could be extended to another 3 months. However, this extension is to be granted on a case-by-case basis. Therefore, it is recommended that an Environmental and Social Officer has to make a case study for each PAP prior to the decision.
Loss of source of income or access to source of income	Temporary loss of income source or access to it	Owner or workers in formal registered businesses	Provide cash compensation for the duration of business/income generation that is disrupted based on net income. This includes the loss calculated based on the time needed to re-establish the business elsewhere.	
Loss of source of income or access to source of income	Temporary loss of income source or access to it	Owner or workers in informal unregistered businesses	<ul style="list-style-type: none"> • Provide cash compensation for the duration of business/income generation that is disrupted based on the minimum wage per month in the respective district. 	

7 Institutional and Organizational Arrangements for Resettlement Planning and Implementation

7.1 Procedures for delivery of Entitlements

7.1.1 Project Screening

Once the project locations are identified, the PIU within CDR will obtain all permits/approvals related to the project. Thereafter, the PIU carry out social screening to determine whether or not the subprojects will result in any resettlement impact and accordingly the PIU will decide the need for the preparation of a resettlement action plan or an abbreviated Resettlement Action Plan.

7.1.2 Preparation of Socio-Economic and Inventory Survey

Following the identification of the sub-projects that may involve involuntary resettlement, the PIU will carry out a socio-economic study and census survey, in which baseline data within the project's target areas is collected. This information shall include the PAPs and related household members or dependents, total land holdings, and affected assets amongst other things. This information will be put in writing and shall be used in determining the appropriate compensation and assistance for each affected individual / household.

The objective of conducting this socio-economic survey and census is to:

- Introduce the project activities to the PAPs.
- Collect census data to identify PAPs on the individual and household levels.
- Collect census data to identify vulnerable and severely affected PAPs.
- Collect census data on the overall socio-economic environment of the affected communities
- Identify stakeholders.
- Identify impacts of project activities on the livelihoods of the PAP (i.e. property, structures, income, etc.).
- Identify any concerns or worries the PAPs may have
- Identify the resettlement preferences of the PAPs.

7.1.3 7.1.3 Preparation of Resettlement Action Plans

Any subproject that shall entail the acquisition of land or may result in the involuntary resettlement of people or loss or restriction of access to private or communal resources will require the preparation of a RAP or abbreviated RAP depending on the number of people affected or the significance of the resettlement impacts. The environmental and social staff/consultant within PIU is responsible for preparation of the RAPs. The environmental and social staff first prepared the RAP TOR and send it to the Bank for review before engaging a consultant to prepare the RAP.

The RAP should assess the number of PAPs, propose alternative locations for the sub-projects if possible, identify the eligibility criteria, include provisions for compensation and assistance, and address the means by which the sub-project monitoring and evaluation will take place to ensure that the PAPs receive their compensation and that their grievances are heard and addressed. The mitigation measures and compensation policies proposed in the RAP shall be disclosed to the PAPs for feedback and comments (the RAP outline is in Annex G).

More specifically, the RAP should include:

- Description of the sub-projects;
- Identification of potential impacts (quantified and qualitative information along with number

- of PAPs in each category);
- Objectives of the RAP and its scope) in terms of sub-projects and activities covered);
- Relevant findings of the socio-economic study and all census data;
- Legal framework including the gap analysis;
- Institutional framework;
- Eligibility criteria and eligible PAPs;
- Valuation and compensation for losses;
- Resettlement measures and the entitlement matrix;
- Site selection/preparation, and relocation
- Housing, infrastructure, social services, and integration with host populations;
- Environmental protection and management;
- Stakeholder consultation and community participation;
-
- Grievance Redress Mechanism (procedures and implementation);
- Organizational responsibilities and implementation schedule;
- Monitoring and evaluation - internal and external (procedures, staff, implementation responsibilities and reporting);
- capacity building, cost and budget

As guidelines for RAP preparation, all data (including socio-economic survey and census, consultations, EM, and GRM must be gender disaggregated and reported as such.

If fewer than 200 PAPs are affected, or if all the PAPs suffer only minor impacts (i.e., lose less than 10 percent of their income producing assets), and the subproject does not involve any physical displacement, then an abbreviated plan (ARAP) should be prepared. An ARAP should include:

- A census survey of displaced persons and valuation of assets
- A description of compensation and other resettlement assistance to be provided and the basis of compensation rates
- Consultations with displaced people about acceptable alternatives
- Institutional responsibility for implementation and procedures for grievance redress
- Arrangements for monitoring and implementation
- A timetable and budget.

However, it is to be noted that in terms of application of OP/BP 4.12, the main principles and contents of an ARAP remain the same as for a RAP but the level of detail and items covered should be commensurate with the level of impacts.

7.2 RAP Review, Approval and Disclosure Procedures

The RAP, including the proposed mitigation measures within the plan, will need to be reviewed and approved by CDR board, then will be sent to the WB for review CDR should ensure that this resettlement instrument is made available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to them. Once the WB accepts this instrument as providing an adequate basis for project appraisal, the WB makes it available to the public through its Bank's external website. After the WB has approved the final resettlement instrument, the WB and the borrower disclose it again in the same manner. In addition, for any changes made to the RAP after the approval, the same process of approval and disclosure (that applied to the original RAP) will need to be followed.

7.3 *RAP Implementation*

Once the RAP is approved by the Bank, it will be translated into Arabic and disclosed locally as well as in Bank's external website at the Bank. The PIU of CDR are responsible for implementation of the RAP.

7.3.1 *Signing Compensation Contract*

PAPs will be consulted on their compensation preferences; they will be formally informed through written or verbal notification. In case some of the PAPs are illiterate, they are notified in the presence of at least one public official.

The PIU of CDR will arrange meetings with the PAPs to document the lands acquired by the sub-project throughout the implementation period and discuss the compensation process.

The PAP will be required to sign a contract detailing the acquired land plots and / or partially or completely affected structures, and / or the livelihoods impacts and the corresponding types of compensation (i.e. cash or in-kind) that have been agreed upon. The signature of the compensation contracts as well as the actual payments and in-kind transfers shall be made in the presence of at least one public official from the village authorities. The contracts may also include contracts on possible transitional or developmental assistance and income restoration measures that will be given to the PAPs, including provision of skills, training, access to credit, and sub-project related job opportunities.

7.3.2 *Compensation Payment*

All handing over of property such as land and buildings and compensation payments will be made in the presence of the affected party and village officials. CDR is the main entity in charge of this process.

8 *Public Consultation and Disclosure*

Acquisition of land or other assets and the RAPs preparation require consultation with the project-affected population (PAPs). In addition to tenants, residents, and business owners affected, the concerned municipalities must also consult with associations, NGOs and other representatives of civil society within the affected areas. All consultations will be informed, inclusive of all groups, and gender, and a two-way dialogue to provide information and receive feedback. Responses will be provided by the project for all the queries raised and the participants will subsequently be informed on how their suggestions were incorporated in the design/mitigation measures. To make sure there will inclusion of all groups if need be separate consultation sessions should be arranged as needed for women and vulnerable groups. The RAP will cover information on the number of participants who attended (gender disaggregated data) with locations/time of the consultation, along with a summary of the different consultations held (issues raised and responses to the issues) in the main body of the RAP while the details will be in the annex.

8.1 *Public Consultation Carried out During RPF Preparation*

Public consultations were carried out with various stakeholders in preparation of the RPF.

8.2 *Public Consultation in Resettlement Planning and Implementation*

Public consultation must be an on-going activity taking place throughout the entire project cycle. Thus, public consultation shall take place during the:

- Project planning,
- Screening process,
- Feasibility study,
- Preparation of project designs,
- Resettlement and compensation planning,
- Drafting and reading/signing of the compensation contracts,
- Payment of compensations,
- Resettlement activities and,
- Post compensation monitoring and as relevant community support activities.

The public consultation and participation must take place through local meetings, requests for written proposals/comments, completion of questionnaires/application forms, public consultations and explanations of the Bank financed project ideas and requirements. The public consultation must take into account low literacy levels prevalent in rural communities. Consultation records must be kept by the PIU and include attendance sheets, photographic evidence, a summary of any presentation delivered as well as a list of questions and answers.

8.3 Outcomes of the Public Consultations Held at the RPF stage

Public participation events were held at agreed upon locations in each of the 7 mohafazas or governorates included within the scope of the REP; these were held between 8 and 17 January 2018. Invitations were sent out by CDR to the concerned Ministries, public authorities and, Unions of Municipalities, and by ELARD to concerned NGOs and CSOs through official letters. The invitation letter sent by CDR in Arabic and the email sent to NGOs can be found in Appendix A; and a list of the invitees is provided in Appendix B. As shown in the invitation letters (Appendix A), all stakeholders were encouraged to favor the attendance and participation of women. NGOs invited comprised women's associations in all regions (Appendix B). The NGOs invitation was for two persons, one of which at least being a woman.

ELARD's consultants presented the project details, potential impacts and mitigation measures in a 45-minute presentation (Appendix C) and opened the floor for one (1) hour of open discussions with the attendees. During the questions and answers sessions, various issues of environmental, safety as well as social concerns were raised by the attendees. These were all addressed and discussed by ELARD's consultants. The main issues of concern raised during these public consultation sessions are outlined in

Table 8-1 below, while the more detailed minutes of meetings are listed in Appendix D. Photographic documentation of the consultation sessions is provided in Appendix E. A list of the attendees at each of the respective governorates is attached in Appendix F.

Overall, 47 attendees were consulted, 16 of which were women (34%). Of these 16 women, 5 were decision makers (qaemmaqams), and three were engineers and/or heads of services within unions of municipalities. Four women's associations attended the event, represented by one or two attendees each.

A total of 50 unions of municipalities were also invited to the consultation events, 20 of which attended the events, in addition to a few municipalities.

Moreover, representatives of Syrian displaced persons and stakeholders supporting them were invited to the consultations; these included the UNHCR, UNDP, MoSA, the International Committee of the Red Cross (ICRC), the International Federation of Red Cross and Red Crescent Societies, as well as local and international NGOs. Kunhadi and YASA, concerned with road safety and accidents prevention, were also among the list of invitees.

Table 8-1. Summary of main concerns raised during the consultation sessions for the REP

Topic of concern	Detailed description of concern by public attendees	Answer by ELARD's team
Coordination with relevant municipalities	In general, most of the local authorities present at these consultation sessions were concerned that they would not be contacted or consulted during selection of roads within the scope of the REP.	The public was advised that the selected Consultant would be conducting detailed studies to identify primary roads of utmost priority based on the following criteria: 1) road asphaltting conditions/ deterioration of roads; 2) average daily traffic volume; and 3) equal balance between rural and urban areas; Once selected, there would be further consultation sessions that would be held with local authorities to discuss the results of the road selection and collect feedback and suggestions.
Coordination with relevant authorities, especially with respect to public works, wastewater and water infrastructure, etc.	The public were generally concerned whether there would be coordination amongst all the necessary infrastructural establishments/ministries prior to project execution, since works are typically conducted without coordination, resulting in re-excavations, re-closure of roads, and further nuisances and unnecessary delays and recurrent stressors.	The public was informed that World Bank projects require and ensure that there is full coordination amongst all relevant municipalities and authorities prior to project execution to avoid such unnecessary impacts; implementation is seen in current ongoing WB projects in Lebanon; there would also be continuous follow-up by CDR and the World Bank to ensure that these requirements are being implemented.
Equipment distribution	Some of the municipalities located especially at higher geographic locations that experience harsh winter seasons were specifically concerned that there would not be fair distribution and provision of equipment such as snow blowers, wheel loaders, four-wheel drive vehicles, etc.	The public was advised that consultants awarded by the CDR would carry out the necessary detailed studies to identify the geographic areas of priority in order to determine distribution of the necessary equipment; all the selections would be technically reviewed and approved by CDR and the World Bank.
Project execution and existing studies	Some of the municipalities stated that they would like to be involved in the execution and handing over of the REP to ensure that there has been full compliance with technical requirements; they also advised that they have already conducted studies for roads and safety in their respective municipalities that could be beneficial and	The public was advised that the awarded consultant would review any existing studies to take into consideration as necessary any aspect of these studies and furthermore all road selections under the various components of this project would be discussed in further public participation sessions with the concerned stakeholders/public for any

Topic of concern	Detailed description of concern by public attendees	Answer by ELARD's team
	applicable to this project.	feedback and suggestions.

8.4 Notification Procedures

Public documents must be made available in English and Arabic at CDR and at other relevant locations to ensure easy access to them by PAPs.

The project will through the CDR notify the public of its intention to acquire land assigned for the project. Thus, a public notice must be announced to the beneficiaries concerning physical resettlement and temporary relocation.

The notice must state:

- a) The Government's proposal to acquire the land,
- b) The public purpose for which the land is needed,
- c) That the proposal or plan may be inspected by CDR/PIU,
- d) That any person affected may, by written notice, object to the transaction giving reasons for doing so, to the Project Team within 14 days of the first public announcement or appearance of the notice. Assurances must be made that affected persons have actually received this information and notification.

8.5 Documentation of Compensation Process

For each individual or household affected, the PIU completes a compensation dossier containing necessary personal information on the affected party and those that s/he claims as household members, dependents, total landholdings, inventory of assets affected, and information for monitoring their future situation.

This information is confirmed and witnessed by CDR. Dossiers must be kept current and must include documentation of all assets surrendered and/or impacted. Each individual will be provided a copy of the dossier at the time of negotiations. This is necessary because it is one way in which individuals and households can be monitored over time. All claims and assets must be documented in writing.

8.6 Disclosure

CDR will ensure that affected persons and communities can obtain relevant information relating to the project in general and the land acquisition and resettlement arrangements in particular. The RAP or Abbreviated RAP (excluding individual names and the amounts of monetary awards) must be made publicly available in Arabic and English and will be posted in an accessible and prominent place accessible to project affected persons. The RAPs or Abbreviated RAPs must be approved by the Bank prior to disclosure and the implementation of the resettlement activities.

When RAPs are prepared during project implementation, they will be disseminated to the project-affected persons in a manner accessible to them. Information disseminated to the project-affected persons will include: (i) compensation rates for all categories of affected assets; (ii) eligibility criteria for all other forms of assistance that may be provided; and (iii) grievance procedures. The resettlement and environment consultation and disclosure requirements will also be harmonized and streamlined as appropriate.

9 Grievance Redress Mechanism (GRM)

At the time that the resettlement plan is approved, and individual compensation contracts are signed, affected individuals and households will have been informed of the process for expressing dissatisfaction and to seek redress. The grievance procedure will be simple, accessible by PAPs and should be administered at the local level to the extent possible.

9.1 Procedures for Handling Complaints

The proposed GRM for this project will be disclosed as part of the ESMP and RAP and publicly available. The GRM will be accessible to all relevant stakeholders who can use this mechanism for suggestions, concerns and complaints related to the project, including environmental concerns. The complaints, suggestions and concerns can be sent by e-mail, mail, phone (through a hotline), text messaging, in person and other means. The phone number, e-mail address, and address for receiving complaints will be disclosed among the population and will be posted at project sites once the project becomes effective.

All objections to land acquisition must be made in writing, in a language that the PAP understands and is familiar with, to CDR or by direct or third-party communication with CDR in the event of illiterate PAPs. Attempts must be made to settle grievances amicably. The procedure for handling grievances must be as follows:

- Minor complaints can be addressed to the relevant contractor and site engineer (see blow different levels). But all complaints regardless of their severity should be registered at the PMU. Therefore PMU shall establish a register of resettlement/compensation related grievances and disputes mechanism.
- The existence and conditions of access to this register (where, when, how) shall be widely disseminated within the community/town as part of the consultation undertaken for the sub-projects in general. Moreover, the information on how to access the GRM should be available through billboards, CDR website, etc.
- A committee of knowledgeable persons, experienced in the subproject area(s), shall be constituted at a local level as a Committee to handle first instance dispute/grievances. This group of mediators attempting amicable mediation in first instance will consist of the community leaders/mayor, the PMU Director, and legal advisors for social/income/vulnerable groups and gender issues. This mediation committee will be set up at local level by the implementation agency on an “as-needed” basis (that is, it will be established when and if a dispute arises in a given community).
- When a grievance/dispute is recorded according to the above-mentioned registration procedures, the mediation committee will be established, and mediation meetings will be organized with interested parties.
- Minutes of meetings will be recorded.
- The existence of this first instance mechanism will be widely disseminated to the affected people as part of the consultation undertaken for the sub-project in general. It is important that these mediation committees be set up as soon as RAP preparation starts.
- Disputes documented through for example socio-economic surveys should be dealt with by appropriate mediation mechanisms which must be available to cater for claims, disputes and grievances at this early stage.
- A template form for claims should be developed and these forms be collated on a quarterly basis into a database held at subproject level.
- GRM levels
 - Level 1: Minor complaints and issues, concern or suggestion regarding the project implementation, can be lodged orally or written, through mail, e-mail, phone text message, or social media to the site manager/engineer of the concerned municipality of the sub-project. In case an oral complaint is made, it will be written on paper by the receiving unit.

- At this level the issues should be resolved within the maximum of one week.
- Level 2: If the person is not satisfied with the action of the site manager's Office or complaint is reading land dispute PAPs can bring the complaint to the attention of the mediation committee. The issue shall be resolved within a maximum of two weeks.
 - Level 3: If the person is not satisfied with the decision of the mediation committee, he or she can bring the complaint to the attention of the Head of the concerned Department at CDR. Once the Head of the concerned Department receives the complaint, it needs to be resolved within the maximum of two weeks.

If the grievance relates to valuation of assets, experts may need to be requested to revalue the assets, and this may necessitate a longer period of time. In this case, the aggrieved person must be notified that his/her complaint is being considered.

A designated person at each level will be assigned to be responsible for receiving and recording receipt of each complaint, whether received orally or in writing. The contact information of the designated person will be made publicly available prior to commencement of project implementation. At the end of each month when the project commences, the designated person reports to the PMU on the number and subject of new complaints received, and the status of complaints, if any, that remain under resolution. The report also informs the PMU of complaints that could not be resolved at the lower levels and are being elevated to the PMU Director's attention. The PMU aggregates information received into a status report each quarter, indicating the number and subject of complaints. The quarterly status report also provides up-to-date information on the number and subject of complaints that have been resolved, and the manner in which they have been resolved. The quarterly status reports will be made available for external monitoring and to the World Bank for project supervision and project evaluation purposes.

The GRM does not exclude the formal legal process of the national law. If a grievance remains unresolved following application of the project GRM process, the affected person can initiate legal proceedings in accordance with national law and may have recourse to the Appeals Court as warranted.

Figure 9-1 illustrates the proposed GRM.

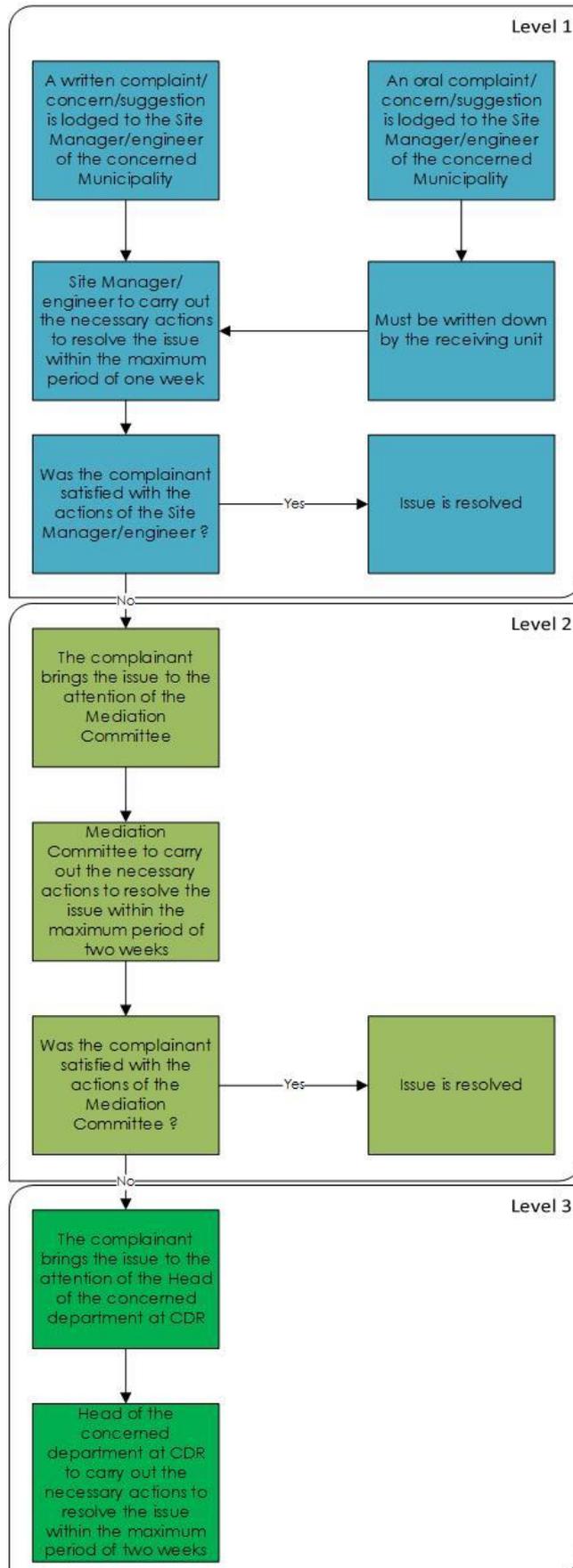


Figure 9-1 Proposed GRM Mechanism

9.2 Appealing Procedures

The decision of the Appeals Committee is binding and final. The Appeals Committee may keep the same level of compensation or make upward adjustments in the level of compensation awarded and must issue their decision within 15 days from submission of the complaint. Irrespective of who appeals (CDR or owner), the owner is required to vacate the property, with rights of sale but not of development, and with access to 75 percent of the compensation until the Appeals Committee reaches its final decision. These funds should be set aside in a special escrow account.

If no agreement is reached at this stage, then the complaint can be referred to the Courts of Law according to Lebanese Law.

10 Resettlement Cost, Budgeting and Funding

At this stage, where the locations of the project have not yet been determined, and when the number of PAPs cannot be identified, it is not possible to provide an estimated budget for the total costs of resettlement that may be associated with the implementation of the project. Therefore, activities for resettlement plan will be funded like any other project. Funding will be processed and effected through the project's financial processing arrangements.

The possible types of activities for budgeting could include compensation for land, livelihoods, trees, crops, assistance to the vulnerable groups, land preparation if crops are damaged, capacity building for the RAP implementation, establishment of GM committee, among others. At this point it is not clear what will be affected and how much budget might be needed.

Funds for implementing inventory assessments and resettlement plans will be provided by the implementing agency (CDR). CDR compensation gets set by a committee including a Judge, engineers, and experts such as valuer. The decision is then sent to CDR for payment. The land is acquired by CDR, for the benefit of the Ministry of Public Works.

In general, the cost of compensation will be borne by the project.

The resettlement plan for a Bank financed project should include an itemized, indicative budget and the implementing agency will finance this budget through the administrative and financial management rules and manuals like any other activity eligible for payment under the Bank financed project. This budget will be subject to the approval by the implementing agency.

The implementing agency will have to finance the resettlement compensation because they will be impacting on the people's livelihoods. Disbursements based on budgetary requirements, established by the resettlement plan in consultation with PAPs, will be made through the PIU.

11 Monitoring and Evaluation

11.1 Internal Monitoring

In line with WB requirements, internal monitoring of the implementation of the resettlement activities will be carried out by CDR PMU assigned team and sent to the Bank as part of the quarterly report. Internal monitoring will be held every three months; results and findings will be included in quarterly project progress reports. The report will mainly cover resettlement policies and compensation standards, resettlement progress, delivery of resettlement compensation, provision of development and transitional assistance to PAPs (especially vulnerable groups), implementation schedule, fund disbursements, land

or structure allocation, and grievances and redress. The final report on the implementation of each RAP will also contain a socio-economic end line survey, describing the post-displacement living conditions and livelihoods of PAPs.

11.2 External monitoring

External Monitoring might be required to ensure that the overall objective of the resettlement plan is achieved in an equitable and transparent manner and ensure the effectiveness of the monitoring and evaluation activities carried out by CDR.

Based on the degree of the complexity of the Resettlement Action Plan, several agencies may also be involved in this process. The Project Implementation Plan spells out the RAP monitoring arrangements; more specifically, it will lay down the performance indicators which will be used to monitor this part of the project and the procedures to be used. To this end, an external, independent consultant will be mobilized to the external monitoring, using the below indicators. To this end, an external, independent consultant will be mobilized to the external monitoring, using the below indicators

11.3 Monitoring and Evaluation Indicators

The RAP monitoring indicators will be simple but robust indicators or proxies that should be as far as possible visible and verifiable and that will, according to the nature of the impacts, measure the following key outcomes against the pre-resettlement baseline. Some key monitoring and evaluation indicators are shown in Table 11-1.

Table 11-1: Verifiable Indicators for Monitoring and Evaluating Implementation of Resettlement Activities

Monitoring	Evaluation
Percentage of individuals selecting cash or a combination of cash and in-kind compensation	Proposed use of payments
Payment of compensation to PAPs in various categories by CDR	Number of PAPs compensated by CDR; Timeliness of payments to PAPs in various categories; Conformance to compensation policies described in the RAP
Number of grievances	Timeliness and quality of decisions made on grievances; Timeliness of complaint handling as described in the RAP.
Delivery of technical assistance, relocation, payment of transitional subsistence and moving allowances	Facilitation of access to technical and development assistance and transitional allowances
Delivery of income restoration and development assistance. Payment of compensation to PAPs in various categories, according to the compensation policy described in the RAP; with special focus on the vulnerable groups and avoiding discrimination based on gender, tribal backgrounds or any other factors	Ability of individuals and households to restore sources of income
Public information dissemination and consultation procedures	Timeliness, quality, and effectiveness of consultation and information disclosure; Frequency of interaction/communication with PAPs

APPENDICES

Appendix A – Invitation Letters sent to Stakeholders

Invitations sent to Public Stakeholders



Sample Invitation sent to NGOs

Appendix B – List of Invitees to the Public Consultations

Mohafazas	Union of Municipalities	Total # Unions/ Mohafaza	Public Authorities
Akkar	Jord El-Qaytaa Sahel wa Wasat El Qaytaa Al Shafat Al Joumeh	4	MOPWT: - DG of Land and Maritime Transport; - DG of Roads and Buildings; - Railway and Public Transport Authority.
N. Lebanon	Batroun Bcharre District Koura Minieh Dinnieh Al Fayhaa Zghorta District	7	CDR MoE MoSA (Social Affairs) DGA MoIM
S. Lebanon	Saida-Zahrani Jezzine Sahel Zahrani Sour District Jabal Rihan	5	Governors and Qaemmaqams of the North, Akkar, South, Nabatiyeh, Bekaa, Baalbek- Hermel, and Mount Lebanon
Nabatieh	Bint Jbeil District Chqif Aarqoub Iqlim Al Teffah Jabal Aamel	5	
Mt. Lebanon	Jbeil District Keserouan Ftouh Shouf Sweijani Iqlim Al Kharroub Al Janoubi Iqlim Al Kharroub Al Shamaly Higher Chouf Jord Al Aala-Bhamdoun Higher Metn Sahel Al Metn Jounoubi Dahyeh Al Janoubieh Metn Shamaly-Sahily-Awsat	11	
Baalback- Hermel	Baalback Hermel W. Baalback E. Baalback Al Shallal	5	
Bekaa	Sahel Al Bouhayra Zahle District E. Zahle	5	

Mohafazas	Union of Municipalities	Total # Unions/ Mohafaza	Public Authorities
	Beqaa Al Awsat		

International Organizations:

- UNDP
- UNHCR

Local NGOs:

جمعية أرز الشوف
جمعية إنماء البيئة في راشيا
جمعية البيئة في رأس بعلبك
مركز التعرف على الحياة البرية
جمعية عاريا البيئية
جمعية أركانسيل
جمعية البيئة والانسان - حبوش
جمعية الحفاظ على البيئة في البقاع
هيئة حماية البيئة و المحافظة على التراث - النبطية
جمعية حماية و تنمية الثروة الحرجية
جمعية أمواج البيئة
جمعية النجدة
ورشة الموارد العربية
ARCHI-Tree
كاريتاس

Creative Associates International Inc.

كاريتاس إنترناشونال الأمانة الإقليمية لمنطقة الشرق الأوسط وشمال أفريقيا
Caritas Internationals Regional Secretariat for the Middle East and North Africa

جمعية التعاون من أجل التنمية

Community Habitat Finance

هيئة الحفاظ على البيئة بشري

جمعية الخدمات الانسانية و الاجتماعية في الشمال

تجمع الهيئات الأهلية التطوعية

مركز الدراسات والتدريب والتطوير

مركز الاطفال و الفتوة

مركز الدراسات الإنمائية و البلدية

ندوة الدراسات الإنمائية

جمعية العناية بالبيئة و الإنسان

جمعية البيئة والطبيعة

لجنة رعاية البيئة

جمعية التنمية الريفية- عرسال

جمعية بيئة بلا حدود

مؤسسة فريدريش إيبيرت

مؤسسة فارس

الاتحاد الدولي للمدن المتحدة

أصدقاء حرش إهدن

أصدقاء الطبيعة

مؤسسة فرح الإجتماعية

تجمع أصدقاء أرز تنورين- حدث الجبة
جمعيات الملتقى الأخضر
جمعية الخط الأخضر
جمعية الجبل الاخضر
المربع الاخضر
جمعية الخدمات الخضراء
مؤسسة الحريري
بعثة اللجنة الدولية للصليب الأحمر
مؤسسة التعاون الإقتصادي والتقني الدولية
الإتحاد الدولي لجمعيات الصليب الأحمر والهلال الأحمر الدولي
المؤسسة اللبنانية للتنمية الاقتصادية والاجتماعية
مركز الشرق الأوسط للإرشاد والإنماء
جمعية نساء جبل عامل
جهاد البناء
مؤسسة جوزف سكاف
جمعية سيدات إنماء البقاع
جمعية اللبانيات الجامعيات
الهيئة اللبنانية لمناهضة العنف ضد المرأة
المجلس النسائي اللبناني
ليبانوس
مؤسسة البيت اللبناني للبيئة
لجنة حقوق المرأة اللبنانية
ملتقى الهيئات الإنسانية غير الحكومية في لبنان
الصليب الأحمر اللبناني
لا فساد- الجمعية اللبنانية لتعزيز الشفافية
جمعية المقاصد الخيرية الإسلامية في لبنان
(Mercy Corps International) ميرسي كوربس الدولية
جمعية البيئة في المنصورية
مؤسسة مخرومي
الحركة الإجتماعية
نداء الأرض
نور- جمعية المرأة العربية
المساعدات الشعبية النروجية
جمعية بيت المرأة الجنوبي
البعثة البابوية
التجمع النسائي الديمقراطي اللبناني
مؤسسة رينه معوض
جمعية سيدة رأس المتن
رابطة النهضة الاجتماعية
تحاد غوث الأطفال/ السويد
إتحاد غوث الأطفال/ أميركا
إتحاد غوث الأطفال/ إنكلترا
المؤسسة العلمانية للتعاون من أجل التنشئة
النجدة الشعبية اللبنانية
جمعية التقدم الاجتماعي في لبنان

جمعية حماية الطبيعة في لبنان
جمعية النهضة الاجتماعية
جمعية المواسة والخدمات الاجتماعية في صيدا
تجمع المؤسسات الاهلية في صيدا
رابطة سيدات دير الأحمر
الصندوق الدولي للتأهيل
تجمع النهضة النسائية
منظمة السلامة العالمية
الرؤية العالمية- لبنان
جمعية العمل النسوي
رابطة المرأة العاملة في لبنان
جمعية الشباب المسيحيين
(Youth Social Awakening Union) اتحاد الصحوة الاجتماعية للشباب
جمعية الشباب المسيحيات
الحركة البيئية اللبنانية
(Lebanese Association for the Protection of the Environment)
الجمعية اللبنانية لحماية البيئة
أرت غولد (Artgold)
الرؤية العالمية (World Vision)
نورث ليدا (North Leda)
(Association for Development in Akkar) جمعية التنمية في عكار
كن هادي
يازرا

Appendix C – Presentations Given during the Public Consultation Events



Appendix D – Detailed Minutes of Consultations

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-Will all the relevant authorities be involved in the process?</p>		<p>-Participation of all relevant authorities will be ensured in future public consultation sessions that will take place in the more detailed phase of the project</p>
<p>-The priority should be to resolve legal obstacles and finalize expropriations, including those related to encroachers, before initiating the project.</p> <p>-The safety of existing roads is a high priority to address through the provision of cat's eye studs, lighting, traffic lights and signals, and rehabilitation of holes. The Saida-Jbaa road is an example whereby bumps were removed, and overall safety remains a major issue; signs and lights are needed, and bumps should be kept to limit speed. This has recently resulted in a deadly accident on the mentioned road that is preventable with the implementation of safety considerations. The public does not feel that roads are constructed with safety considerations. Public safety must be considered first, followed by road design.</p>	<p>Nicolas Abou Daher, Representative of the Governor of South Lebanon and former Governor</p>	<p>-Expropriations and encroachments have been addressed in the presentation, are covered by the RPF of the project, and will be addressed by RAP at later stage.</p> <p>-Safety is one of the REP components (component 3 – support planning and road safety implementation measures), as described in the presentation. Moreover, the requirements for each selected priority road will be studied in more detail in the detailed design phase of the project</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-Public transportation is a priority that is much needed. The lack of such a system is causing significant pollution with heavy reliance on private transport. Students living far from universities / schools and people living far from their workplace need a good public transportation system to stop rural exodus. Rehabilitating existing roads should not be the only aim of this project; more efforts must be directed at establishing a reliable public transportation system.</p> <p>-Issue of coordination with relevant authorities with respect to telecommunications, wastewater, water, and other infrastructure before initiation of excavation works is missing</p> <p>-Road safety signs are also crucial in the REP context; who is responsible for this issue?</p>	<p>Dr. Nahed Msayleb Amwaj Environmental NGO</p>	<p>-The recommendation for the improvement of the existing public transportation system will be documented and reviewed by the World Bank and CDR for future consideration. While public transportation is very important for Lebanon and is deficient in this regard. At present this REP focuses on existing roads and the need for their rehabilitation; public transportation is not a component of this project but can be recommended for future study.</p> <p>-Coordination amongst the relevant authorities is of utmost importance; this is being realized in ongoing projects and will be addressed by CDR for the REP project.</p> <p>-All areas that require safety signs will also be studied as mentioned in the presentation as part of Component 3 of the REP – MoPWT is the responsible party, and all detailed studies will be carried out by the awarded Consultants.</p>
<p>-Jabal Rihan municipalities have snow and blocked roads during the winter season. There is no trust in public authorities at all, and unions of municipalities are assuming almost all of the responsibilities that the MoPWT should be assuming. Municipalities are concerned that they may not benefit from the equipment mentioned in the project presentation, and that other municipalities (even coastal) having stronger connections with decision makers and politicians might be awarded the much-needed equipment while they are less in need.</p>	<p>Bassem Sharafeddine, Architect/ President of the Union of Municipalities of Jabal Rihan</p>	<p>-With World Bank projects, there is a systematic process that needs to be followed; as such, during the detailed phase each governorate and geographic area will be carefully studied to identify those of utmost priority and equipment will accordingly be recommended and distributed.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-Secondary roads and their safety have not been considered in this project; studies are required for around 20km of roads in Jabal Rihan to assess road safety and the number of accidents that occur.</p> <p>-Will coordination with concerned municipalities take place? The Union of Jabal Rihan Municipalities has conducted some recent studies that take into consideration safety issues and hopes these studies will be reviewed and taken into consideration. Roads in the Union are in poor conditions; for example, a road connecting the Jezzine, Marjaayoun and Bekaa cazas that has been existing for 15 years was asphalted in 2008. Since then, no maintenance has been conducted and the road is now in poor condition; it is necessary for road safety studies to be conducted as a pre-requisite for the selection of projects.</p> <p>-How will municipalities know what type of equipment can be beneficial to them, and how can they be involved and have a say in the selection process?</p>		<p>-This recommendation will be documented as necessary.</p> <p>-There will also be coordination with the relevant authorities/municipalities to determine priorities accordingly and existing studies for roads and safety will also be reviewed by the Consultants as necessary.</p> <p>-As for the equipment that can be beneficial to the respective municipalities, a detailed study will be conducted by the awarded Consultants to determine the needs and necessities, and of course future public participation sessions will take place seeking feedback on selected projects.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-The geographic situation of each governorate/ municipality is different; some villages are very far from main roads, and thus may not benefit from this project.</p> <p>-Will municipalities also be involved in the decision –making relating to equipment and other components of this project, such as roads design? Municipalities have different problems with main roads. Will municipalities’ opinion and suggestions be taken into consideration or will CDR/MoPWT decide without consulting local authorities?</p>	<p>Lena Slim Jezzine Qaemmaqam</p>	<p>- The awarded consultants will study the existing roads and will determine the priority roads based on several criteria including existing road situation based on asphalt condition and road deterioration, the average daily traffic, and will balance between rural and urban areas.</p> <p>-Full coordination with all relevant parties / authorities / stakeholders will take place in future public participation sessions; coordination will take place with engineers and other members of municipal councils to study and consider issues of utmost priority that will be taken into consideration in the final designs</p>
NABATIYEH GOVERNORATE – Consultation Session on 09 January 2018		
<p>-What is the role of municipalities in decision-making relating to the roads that will be selected for rehabilitation under this project? Will there be any meetings with the unions of municipalities or municipalities themselves in the decision-making process?</p> <p>-What is the nature of the project other than road rehabilitation?</p>	<p>Ahmad Kreidy, Hasbaya Qaemmaqam</p>	<p>-Consultants will first be selected by CDR; these consultants will conduct the needed studies and will then hold public participation meetings with all concerned authorities, whose concerns and suggestions will be taken into consideration and documented as necessary in the reports that will be submitted to the WB for review.</p> <p>-Mainly primary, secondary and tertiary roads rehabilitation, road safety measures, and improving road emergency response.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-What is the role of municipalities during execution of the project? Will they be responsible for approving the project upon completion?</p> <p>-Is the priority to link the main roads between the villages or is it for the internal roads within villages?</p> <p>-It is understood that the World Bank is funding the roads rehabilitation project, and the bidding and execution will be carried out by CDR.</p> <p>-Will the funds be distributed equally amongst all cazas?</p>		<p>-During execution, there will be full coordination with all relevant authorities, municipalities, etc. But approval will be from the CDR/World Bank. Local authorities' suggestion will be documented for WB review.</p> <p>-The purpose of this project is to give priority to the main roads.</p> <p>-World Bank is not only funding the project but will be following up continuously throughout the project life cycle.</p> <p>-Funding distribution will be distributed amongst governorates based on the criteria for the selected roads and these including existing road situation based on asphalt condition, road deterioration, average daily traffic; and there will further be a balance between rural and urban areas.</p> <p>-CDR, further to approval by the World Bank, will assign consultants who will conduct further participation sessions as per WB safeguard policies and the ESIA decree (Decree 8633/ 2012) requirements once this stage has been reached;</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-Should municipalities expect another public participation session with CDR to discuss roads selection? Who will take initiative to follow up on the project - CDR or municipalities?</p>		<p>meanwhile, local authorities can contact Mr. Elie Helou or Mr. Fadi Matar at CDR for clarifications and suggestions.</p>
<p>-When will this project be executed?</p>	<p>Several attendees</p>	<p>-As the World Bank has requested the finalization of the stakeholder participations at the soonest, it is expected that the project will be implemented in the near future.</p>
<p>-Are the municipalities and unions of municipalities the only concerned authorities for this project?</p> <p>-Will there be any further interferences (political) that can have an impact on the decision of the selected roads for rehabilitation?</p>	<p>Bilal Chehade, President of the Union of Municipalities of Iqleem El Tuffah</p>	<p>-In addition to these stakeholders, the concerned ministries such as MoPWT, MoE, Ministry of Interior and Municipalities, CDR are also involved.</p> <p>-If this were the case, this would be a contradiction to the World Bank objectives and principles; criteria for selection of roads have been mentioned and will also be discussed with relevant authorities and stakeholders during future consultation meetings once roads have been selected. Criteria for road selection are mainly technical and include Average Daily Traffic, road deterioration and road asphaltting conditions on primary roads.</p> <p>-They are free to prepare their plans, knowing that the criteria for selection have already been mentioned; these plans will be reviewed against the criteria developed, and will be taken into consideration when relevant.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-How will the funds be distributed amongst the governorates?</p> <p>-The capacity building and implementation support under component 3 is a very important issue and is commended</p> <p>-Do we have the right to stop the projects if we see that they are not progressing properly or if there are any deficiencies observed?</p>	<p>Ali Assaf, President of Union of Municipalities of Shallal</p>	<p>-This project is still in its initial stage and once more detailed studies are conducted to identify the priorities and needs, the distribution of funds amongst the governorates will be determined. Criteria for the selection of priorities are the average daily traffic, asphalt conditions and road deterioration.</p> <p>-It is possible to voice any complaints the community or locals may have through the Grievance Redress Mechanism of the World Bank as mentioned in the presentation, and these will be reviewed by the concerned parties and action will be taken accordingly.</p> <p>-This could be the case since the numbers mentioned here are for the <u>registered</u> Syrian refugees; so it could be that there are additional unregistered numbers.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-The number of Syrians as stated in the presentation - 128,293 (UNHCR, 2016) - is incorrect as their number is much higher</p> <p>-Municipalities are very happy with this project, but they want to ensure that all road works are conducted properly, well managed and well-studied so that it will not be necessary to excavate roads again for further asphaltting works or maintenance works a short period after road rehabilitation works under this project have already been executed – even if this means that only 5km versus 20km of roads will be allocated for each governorate, it is better to ensure that these 5km are well planned to avoid any future inconvenience.</p>		<p>-The project is still in its initial phase and of course the necessary studies will be carried out prior to execution of the project as necessary by the awarded consultants, with full and continuous supervision throughout the project life-cycle that will be regularly monitored by the World Bank.</p>
<p>-There is a project taking place in Baalbek with World Bank funding, but municipalities have no idea about the execution of the project and they would like to be more involved in such projects. They do not have any plans, drawings or studies to be able to check against executed works and make sure they are progressing correctly and in compliance with the criteria for the project. For example, during a previous project involving concrete works, the Municipality had noticed the Contractor was not in proper compliance with safety and work requirements, and therefore stopped the works; the contractor resumed the works only after having corrected the needed and complied with the necessary requirements. Will similar control be exerted over this project?</p> <p>-The Contractor must ensure that insurance is provided to all labourers working on the project in case of any accidents.</p>	<p>Nasri Osman, President of Union of Municipalities of Baalbek</p>	<p>-With the World Bank projects there is continuous follow-up from the side of the assigned project management unit and the supervising consultants who will be providing documentation and reporting on a regular / weekly / frequent basis and mistakes will be corrected as needed to avoid penalties or halting or delay in works – World Bank also visits all work sites regularly to follow up on all safety and other matters.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
		<p>-One of the main criteria and requirements of the World Bank is to ensure that all labourers are fully insured, especially in the event of any accidents which may potentially occur. The relevant documentation providing such evidence showing full insurance coverage shall be reviewed by CDR.</p>
<p>-How will the equipment be distributed amongst the governorates, especially the snow blowers and the like?</p> <p>-Will wastewater networks be extended as part of the REP in order to avoid excavations after the project has been executed?</p>	<p>Ibrahim Nassar, President of Union of Municipalities of West Baalbek</p>	<p>-Such equipment will be distributed based on the geographic locations that are in most need of such equipment; so the mountainous areas would get priority over the areas at lower altitudes, but these will be studied and selected by the awarded Consultants.</p> <p>-Wastewater networks are not part of the REP; however, coordination will be conducted with all relevant municipalities and stakeholders as necessary to ensure all infrastructure works are conducted in coordination with each other and to avoid closing up roads again for further excavations and works again (to the extent possible).</p>
<p>-We would like to be fully involved in the execution of the project in order to facilitate and expedite the progress of the project as smoothly as possible</p>	<p>Asked by general attendees</p>	<p>-It is possible to keep up with the progress of the project through the available social media that will be created for communication of the project components and their geographic locations as necessary.</p>
<p>-We are concerned that once roads have been executed under this project, they will be excavated again very soon for further infrastructure works, thus causing additional and extended traffic delays and noise pollution, and stress, etc. We suggest ensuring that infrastructure works are all coordinated and conducted at the same time.</p>	<p>Rawya Mehdi Soleh, Women's Assembly Organization</p>	<p>-It is the role of CDR and the awarded consultant to ensure that all coordination works are conducted prior to initiation of any execution of road works as necessary.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
NORTH LEBANON GOVERNORATE – Consultation Session on 16 January 2018		
<p>-Will coordination with the relevant stakeholders take place or will CDR do the roads selections without consultations?</p>	<p>Iman Al Rafii, Qaemmaqam of Zgharta</p>	<p>- CDR will appoint a consultant in each governorate to study the roads of priority under the 3 components of Phase 1 of the REP; public participation sessions will then take place for discussion, feedback, and suggestions.</p>
<p>-In every caza there are a number of roads; what are the criteria for selection of the roads of priority?</p> <p>-EIA and expropriation will take a long time as was the case with many other projects that were planned decades ago.</p>	<p>Rouaida Yaghi, Head of Engineering Department, Union of Municipalities of Batroun</p>	<p>-The criteria for road selections under the REP include primary, secondary and tertiary roads, existing asphaltting conditions/ road deterioration, average daily traffic, and balance between rural and urban areas will be ensured. Further public participation sessions will be held at a later stage of the project to discuss the results of the selections and collect feedback and concerns.</p> <p>-During the 1st phase of the REP project, Environmental and Social Impact Assessment (ESIA) will be conducted and once these are approved, expropriations, if any, will take place in parallel with the design. The CDR expropriation department will be handling all expropriations.</p>
<p>-When will coordination begin between the municipalities and the awarded Consultants?</p>	<p>Jessy Franjeh, Civil Engineer, Union of Municipalities of Zgharta</p>	<p>-The project is progressing; coordination / consultations will be carried out the soonest after this stage of consultations has been completed, and once there is approval from the CDR/World Bank to proceed.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-Municipalities can request a bank guarantee from the Contractor and during handover of the project, a representative from the relevant municipality should give their approval of the works.</p>	<p>Dima Homsy, Director, Union of Municipalities of Fayhaa</p>	<p>-The Project Management Unit assigned by the World Bank already ensures that the awarded Contractors provide all the necessary paperwork and documentation; the World Bank and CDR give the approval for the project finalization and reception while taking into consideration any and all comments from the relevant stakeholders as necessary.</p>
<p>-In the study phase, it is important to communicate with all relevant authorities/municipalities because there are several villages that are not included in the Union of Municipalities.</p> <p>-There are some roads at higher elevations in the mountains that have to be closed during the winter season; what types of equipment could be beneficial to us?</p>	<p>Rouba Al Chafchaq, Becharri Qaemmaqam</p>	<p>-All affected parties and stakeholders will be identified as necessary and there will be full coordination with all parties.</p> <p>-The mountainous roads could benefit from the equipment as mentioned in component 2 of the project including wheel loaders, snow blowers, and salt spreaders; the awarded consultants will carry out the necessary studies to determine the geographic areas of utmost priority and their respective needs.</p>
AKKAR GOVERNORATE – Consultation Session on 16 January 2018		
<p>-This is a very good project and we hope that it can be implemented without any issues.</p>	<p>Amani Nafee, Lebanese Democratic Women's Committee</p>	<p>-World Bank projects are very systematically implemented in Lebanon and in the region; this comment will be documented.</p>
MOUNT LEBANON GOVERNORATE – Consultation Session on 17 January 2018		
<p>-Which roads will be selected from the 500km of roads allocated for this project?</p>	<p>Najwa Sweidan, Jbeil Qaemmaqam</p>	<p>-This REP focuses mainly on existing primary, secondary and tertiary roads in all 7 governorates within the scope of this project, excluding Beirut.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-Shouldn't municipalities decide what roads have utmost priority within the scope of this project? Some Unions of Municipalities do not include all municipalities that are essentially experiencing dangerous road conditions and severe snow storm events with serious deficiencies in equipment, safety measures, etc.</p>		<p>-Consultants, under the supervision of the World Bank, will take into consideration concerns and points of views raised by all concerned stakeholders. The World Bank has special policies that require the involvement of all stakeholders, and their comments and suggestions will all be documented, reviewed and considered during project design and implementation.</p>
<p>-How will component 2 of the project for the purchase of items like snow blowers, wheel loaders and other equipment be distributed amongst the governorates?</p>	<p>Nicolas Al Haber, Union of Municipalities of Jord Al Aala and Bhamdoun</p>	<p>-Detailed studies will be conducted by the Consultants at a later stage to allocate equipment distribution, but priority will ultimately be given to the geographic areas situated at higher mountainous elevations, as opposed to lower locations, that experience more snowstorms and extreme weather.</p>
<p>-Please provide a definition for primary roads.</p>	<p>-Asked by general attendees</p>	<p>-Primary roads provide the link between villages or between the cities and villages, and also include the main roads within the villages and the cities.</p>
<p>-During the study and selection of roads that are of utmost priority, will a private office be assigned to conduct the works?</p> <p>-If the REP requires partial expropriations within an existing decree, would it not be necessary to secure the compensations to cover the full expropriation fees of the existing decree?</p>	<p>Ghadir Hamadeh, Engineer, Technical department, Union of Municipalities of El Chouf El Swajjani</p>	<p>-Yes, a private office/Consultant under the supervision of CDR and World Bank will be assigned the project studies and consultations.</p> <p>-There will be full compensation only to the affected areas that require expropriation within the scope of the REP.</p>
<p>-Expropriations by CDR are a very a sensitive issue; the need for expropriations might arise within the scope of the REP which might remain</p>	<p>Mohammad Dergham,</p>	<p>-As mentioned in the presentation, the REP will avoid to the extent possible any expropriations, but having said that,</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>pending for extensive periods of time like the case of the "Sayyed Hadi" Highway for example, where the expropriation ("وضع اليد") is still pending to date as a result of unresolved encroachments, and no representative from CDR is available here today to explain the reason(s) for the delay(s).</p> <p>-What is the duration of the project?</p> <p>-What are the criteria for the projects selection? Will they really be implemented, or will there be political interference? Because if that is the case, then our presence here today is useless and is a waste of our time.</p>	<p>President of Union of Municipalities of the Southern Suburbs of Beirut</p>	<p>the World Bank policy is to compensate the affected parties, landowners and potential encroachers as necessary. And if national laws are deficient in this respect, the World Bank will fill in policy gaps; e.g. in the case of the Bisri dam project, all affected landowners are being fairly compensated financially or otherwise before project implementation.</p> <p>-As the World Bank has requested the finalization of the stakeholder participations at the soonest, it is expected that the project will be implemented in the near future.</p> <p>- There are no politics involved in this project. World Bank policy is to ensure that all the criteria as mentioned including primary/ secondary/tertiary roads, the average daily traffic volume, the asphalt condition / deterioration of the roads, and an equal balance between rural and urban areas are systematically implemented, and there will be continuous follow-up to ensure proper compliance and implementation throughout the project life cycle without any political intervention, as this project focuses on selections via the technical criteria mentioned.</p> <p>-If the Consultant sees that the study is feasible and convenient for the purpose of the REP scope of works, they can take it into consideration and this can save time.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-We have conducted recent studies that are ready for execution; will these be taken into consideration, as we are ready for full coordination with the concerned parties?</p>		
<p>-What if the REP works on the existing primary roads had an impact on the adjoining roads? This would potentially raise issues of expropriation. Is this being taken into consideration by CDR?</p> <p>-Will priority be given to some governorates over others?</p>	<p>Marwan Salha, Union of Municipalities of Higher Metn</p>	<p>-If there is a need for any expropriation, which we will be avoided to the extent possible, then the CDR will take this into consideration and take the necessary steps as per the relevant Law and the World Bank policies mentioned.</p> <p>-The awarded Consultants will study the existing roads situations within the 7 governorates under the scope of this project, and priority will be given based on the criteria including primary/ secondary/ tertiary roads, the average daily traffic volume, the asphalt condition / deterioration of the roads and an equal balance between rural and urban areas.</p> <p>-The consultation sessions with the relevant municipalities, unions, etc. will be carried out by the awarded Consultant, and all concerns and suggestions will be taken into consideration and documented for WB review as necessary.</p> <p>-The current consultation sessions are being conducted in order to explain the project components to the public, the</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-I propose that the Unions of Municipalities meet in the relevant cazas, choose the roads of priority under the scope of works for this project, and coordinate with MoPWT to push for the rehabilitation of these projects.</p> <p>-MoPWT is involved mainly in primary roads, while the Unions of Municipalities are responsible for secondary and tertiary roads; we have no right to choose the roads of priority under this project, therefore we are concerned that our presence here is a waste of our time. This creates confusion regarding our actual role.</p>		<p>ESMF and RPF aspects, and to get feedback, suggestions and comments. Unions of municipalities are also concerned with roads falling within their jurisdiction and are involved in their planning. For any additional concerns, kindly contact Mr. Elie Helou or Mr. Fadi Matar representing CDR.</p>
<p>-Will coordination between all Unions of Municipalities and Consultants take place?</p> <p>-Does this project include infrastructure works?</p>	<p>Nahida Reslan Salha, Women's Organization of Ras El Metn</p>	<p>-The World Bank policy is to ensure full coordination between all relevant stakeholders, and that includes all unions of municipalities.</p> <p>-These are not included in the REP scope of works, but there will be full coordination with the authorities in charge of water and wastewater infrastructure, public works, etc. to take the necessary measures to avoid unnecessary and repeated/ extended periods of road works.</p> <p>-Before project initiation, it is up to the Contractor with Supervising Consultants to ensure full coordination with all relevant municipalities and authorities as necessary; so far,</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p>-The full coordination between all infrastructural departments/ministries is a must so as to avoid further nuisances with road blockages due to excavations, more delays and traffic and general dissatisfaction.</p> <p>-Component 2 of the REP to improve road emergency response capacity is a very important component of this project. Bhamdoun Municipality possesses no equipment or items as listed in the presentation, especially considering our weather conditions in the winter season; it would be good if we were considered and selected as a priority within the scope of this project.</p>		<p>World Bank funded projects are not experiencing this problem.</p> <p>-As mentioned, Consultants will carry out all required studies to select geographic areas of priority and this suggestion will be documented.</p>
<p>-I understand that we are here today to comprehend fully the scope of this project and its various stakeholders, but unfortunately, we do not see concerned parties here. It appears to us therefore that although this is a very important project, and we are very happy with it, it is not being taken seriously as concerned parties are not present, and this is essentially a waste of our time. We are sorry we will have to leave the session.</p> <p>-How can we take this REP seriously if the relevant parties are not all here even though we are excited about this project and we left our duties to come and attend this meeting?</p>	<p>Marlene Kahwaji, Shouf Qaemmaqam</p>	<p>-ELARD is the environmental Consultant on the REP, and we will do our best to answer any questions or concerns that you may have, and of course the concerns you have raised now will be documented.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p><i>Several attendees left the premises.</i></p>	<p>Najwa Sweidan, Jbeil Qaemmaqam</p>	<p>-For any concerns that you have for which you do not find our answers or responses sufficient, kindly contact Mr. Elie Helou or Mr. Fadi Matar at CDR.</p>
<p>-Each Municipality and Union of Municipalities should have a separate meeting with the assigned Consultants at this stage, as it is not clear to us what the project details are and what our role is.</p> <p>-Component 2 is very important for us, especially considering the lack of road emergency response capacity, and we hope we too will be considered during selection. We have sent in the past year and a half, suggestions to the concerned authority as to how we can improve the road safety in our region with implementation of safety signs, radars, road bumps, etc., and to this date we have not received a response even to state that our suggestions are not necessary for example.</p> <p>-We also propose that the REP includes distribution of radars, not only on highways, but also on mountainous roads; this will reduce deaths and accidents by imposing proper speed control measures and would involve the Ministry of Interior and Municipalities and the MoPWT. As such, the World Bank would have funded a project that would benefit not only safety measures but also the generation of some income for the relevant authorities. We believe that implementation of radars is more important than asphaltting of roads.</p>	<p>Marlene Kahwaji, Shouf Qaemmaqam</p>	<p>-This project is now at a framework stage and has not reached a detailed stage; once that stage is reached, further meetings will be conducted with the concerned authorities and stakeholders.</p> <p>-Same as above</p> <p>-This is an important recommendation which shall be documented and please note that it is covered under components 2 and 3 of this project for a total amount of \$15 million.</p>

Questions/Comments	Addressed By	Answer (by ELARD's consultants)
<p data-bbox="237 323 1032 456">-\$15 million for road safety improvements, equipment and capacity building are not sufficient when distributed amongst the 7 governorates. The Ministry of Interior should conduct a national study in this regard and reconsider the allocated amount.</p> <p data-bbox="237 555 882 580">-It is important that all studies conducted are fully disclosed.</p>		<p data-bbox="1393 858 2018 954">-Yes, it is a World Bank policy to fully disclose all results, documents and reports so all information will be made available to the public.</p>

Appendix E - Photographic documentation of the consultation sessions





South Lebanon Governorate Consultation Session Attendees and Venue



Nabatiyeh Governorate Consultation Session Attendees and Venue



Baalbek Governorate Consultation Session Attendees and Venue



Bekaa Governorate Consultation Session Attendees and Venue



North Lebanon Governorate Consultation Session Attendees and Venue



Mount Lebanon Governorate Consultation Session Attendees and Venue (Sin El Fil Municipality)

Appendix F - List of the Attendees at the Different Governorates



Appendix G- Outline for the Resettlement Action Plan

This Resettlement Action Plan outline is based on WB OP4.12 and will benefit from some information contained in this RPF

1. Introduction

- a. Description of the project
- b. Objectives of the resettlement plan
- c. Brief description of the project and components for which land acquisition and resettlement are required, and an explanation of why a resettlement plan or an abbreviated plan cannot be prepared by project appraisal;

2. Principles and objectives governing resettlement preparation and implementation (copied from the RPF), including measures to reduce impact

3. Policy and Legal framework for resettlement looking at GOL's laws and regulations and the WB OP4.12 guidelines. Establish gap where they exist and how they can be addressed (since there is a RPF that should be taken and be in accordance to this RPF)

4. Baseline Inventory to characterize PAPs in terms of the nature and extent of their being impacted; magnitude of expected loss (total or partial) and extent of displacement (physical or economic) and identify vulnerable groups who may need special provisions.

- a. **Including a land tenure and land use inventory** to establish land ownership/use rights (and loss thereof), conflicts which might arise and loss of social networks and social support systems as a result of implementing the project if relevant

5. Eligibility criteria and determination eligible persons for compensation

6. Valuation of and compensation for losses for livelihoods restoration and improvements

7. Description of the process for preparing and approving resettlement plans;

8. Implementation Mechanism

- a. **Community participation/consultation** will help in identifying/verifying PAPs and their association to type and magnitude of asset loss
- b. **Procedures for physical relocation, both physical and economic**, if relevant, what support will be provided to the relocating PAPs in what manner (physical transportation means or cash) and after resettlement what support will be provided to enhance restoration of PAPs' livelihoods?
- c. **Grievance redress mechanisms**
- d. **Organizational Responsibilities**
- e. **Organizational Procedures for Delivery of Entitlements** who will provide budget and who will do the payment of compensation to PAP and in what manner?

9. Budget – identify all cost items and cost them in a manner which ensure that values may be true for a while

10. Implementation schedule, develop a realistic implementation schedule bearing in mind that implementation cannot start unless all compensation dues are full paid and PAPs have vacated the land.

11. Monitoring, evaluation and reporting to be done by an implementation agency but occasionally by an independent entity to ensure objectivity.

Appendix H: Grievance Form

Grievance form

Serial	_____
Date	_____
Municipality	_____
Education of the person reporting the grievance	_____
Age of the person reporting the grievance	_____
Gender of the person reporting the grievance	_____
Topic of grievance	_____ _____ _____ _____ _____ _____ _____
Actions to be taken	_____ _____ _____ _____ _____ _____ _____ _____
Monitoring of the action	_____ _____ _____ _____ _____ _____ _____