



**LEPAP** | LEBANON ENVIRONMENTAL  
**POLLUTION ABATEMENT**  
PROJECT

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## **GRIEVANCE REDRESS MECHANISM**

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## DEFINITIONS

|   |   |
|---|---|
| LEPAP :   | Lebanon Environmental Pollution Abatement Project.  |
| Beneficiaries :                                     | Any industry borrowing or planning to borrow under LEPAP in order to implement pollution abatement projects.  |
| Sub-project :                                       | All projects eligible to be financed under the LEPAP financial scheme including the following types of projects: resource efficiency, resource recovery, waste minimization, pollution prevention, clean technology adoption, fuel substitution and end-of-pipe treatment.                  |
| Environmental and Social Impact Assessment (ESIA) : | An instrument to identify and assess the potential environmental and social impacts of a LEPAP sub-project, evaluate alternatives, and design appropriate mitigation, management and monitoring measures. An ESIA is usually required for the LEPAP sub-projects classified as “high risk”. |
| Environmental and Social Management Plan (ESMP) :   | An instrument that details the measures to be undertaken during the implementation and operation of a sub-project to eliminate adverse environmental and social impacts. An ESMP is usually required for the LEPAP sub-projects classified as “Medium risk”.                                |
| Individual Grievance Redress Mechanism :            | The grievance redress mechanism available at the level of an industry benefiting from the LEPAP technical support and financial facilities.   |

The Grievance Redress Mechanism (GRM) is a complaints mechanism consisting of a set of arrangements aiming at mitigating, managing, and resolving potential or realized negative impacts resulting from the LEPAP financed sub-projects, as well as ensuring good labor and health and safety measures are implemented in addition to contributing to positive relations with communities and employees.

The GRM makes sure the complaints are promptly reviewed and addressed by the responsible persons at the LEPAP and/or the concerned industry.

The GRM is open to all individuals and/or groups who believe they are being affected by a LEPAP financed sub-project during the sub-projects life-cycles including construction and operation phases.

The objectives of the implementation of a GRM at the level of LEPAP are:

- Defining a transparent and reliable method of timely receiving, evaluating and responding to grievances from employees, contractors, workers, nearby communities and other stakeholders regarding environmental, health, safety, and social impacts;
- Providing an early warning on potential negative impacts of the sub-projects and allowing for the resolution of the issues before they escalate;
- Identifying stakeholders' concerns and ensuring effective risk management.

## **1. Eligibility**

A complaint is considered valid and thus will be processed by the LEPAP team whenever:

- It relates to an on-going LEPAP financed sub-project;
- It is filed by employees, workers, individuals and/or communities, or their representative, who believe that they are or may be directly and adversely affected by the project

However, it should be noted that the present GRM cannot address the following issues:

- Awarding of damages or provision of direct compensation;
- Issues not related to the LEPAP financed sub-projects.

Anonymous complaints are accepted whenever enough information/proofs are provided to allow a proper monitoring and follow-up.

## **2. Responsibility**

The GRM is the responsibility of the Monitoring and Evaluation (M&E) Officer of the LEPAP. The Project Manager will intervene during the grievance process in order to approve the complaint report including the proposed solutions. The Project Manager may also intervene at different steps as needed.

### 3. Procedure

Each LEPAP beneficiary has a grievance redress mechanism available at his own level; thus complainants are encouraged to reach out to the beneficiaries first; however, it is the complainant's right to skip the beneficiary grievance mechanism and refer to the LEPAP team for any concern regarding the LEPAP financed sub-projects. A template of the grievance log per industry managed by the LEPAP is presented in Annex 1.

The complainants may also refer to the LEPAP team in case they feel that the beneficiary's grievance mechanism is not addressing their concerns. In addition, complainants may also refer to alternative mechanisms and not LEPAP for resolving any issues related to negative impacts resulting from the LEPAP financed sub-projects.

Complainants are advised to refer to the ESIA's or ESMP's of the sub-projects (if applicable) disclosed on the websites of the LEPAP and the concerned industries for a better understanding of the individual GRMs of the beneficiaries.

Complaints can be submitted by phone, by email, by letter or by hand delivery to the Ministry of Environment or to the LEPAP office directly. The Grievance Form Template presented in Annex 2 shall be used.

In case of a complainant who is more comfortable to submit the grievance orally, complaints could be submitted by direct or third-party communication.

#### *a. Receiving Grievances*

Stakeholders, employees, contractors and workers may submit the grievances through various methods including the following:

- By contacting the M&E Officer on the following :00961 1 976532 or 00961 1 976555 Ext. 515;
- By sending an e-mail at [lepap@moe.gov.lb](mailto:lepap@moe.gov.lb);
- Through letters submitted to the LEPAP Office at the following address: Ministry of Environment, Lazarieh Building - Bloc 2A, 7<sup>th</sup> Floor, Room 7-10 - Beirut, Lebanon;
- Through letters submitted to the Ministry of Environment at the following address: Ministry of Environment, Lazarieh Building - Bloc 2A, 7<sup>th</sup> Floor, Room 7-35 - Beirut, Lebanon;

#### *b. Grievance Acceptance and Registration*

The M&E Officer shall review the submitted complaint in order to determine whether it meets the eligibility criteria or not.

In case the complaint responds to the eligibility criteria mentioned in Section 1 above, it shall be recorded in the "LEPAP Grievance Registry Book (LGRB)" within two days of its receipt.

In the case of an anonymous complaint that does not contain sufficient information to allow a proper monitoring and follow-up, it shall be registered in the LGRB and then archived due to the

lack of sufficient satisfactory information. Otherwise, the anonymous complaint shall be processed as per the following steps.

*c. Notification of Grievance*

The M&E Officer shall inform the complainant about the acceptance or refusal of the grievance including the reasons for the decision within five business days after submission of the complaint.

In case the grievance was accepted, the M&E Officer shall inform the complainant that the LEPAP will respond within 15 business days and shall request additional information, if needed.

Any additional information and evidences shall be presented by the complainant to the LEPAP within five days after the acceptance of the grievance notification has been sent.

*d. Resolution and communication*

Based on the discussion with relevant stakeholders and/or employees and workers and based on the outcomes of the field visit conducted (if needed) and after a thorough review of the available data and proofs, the M&E Officer prepares a complaint report (Template presented in Annex 3) including the proposed actions and the estimated timeline for implementation and submits it to the LEPAP Project Manager for approval.

Once the report is approved by the Project Manager, the complaint report is consulted with the beneficiary and the complainant and updated as needed.

If the complainant does not agree with the actions performed, the M&E Officer should arrange a meeting between him/her and the beneficiary to reach a further agreement.

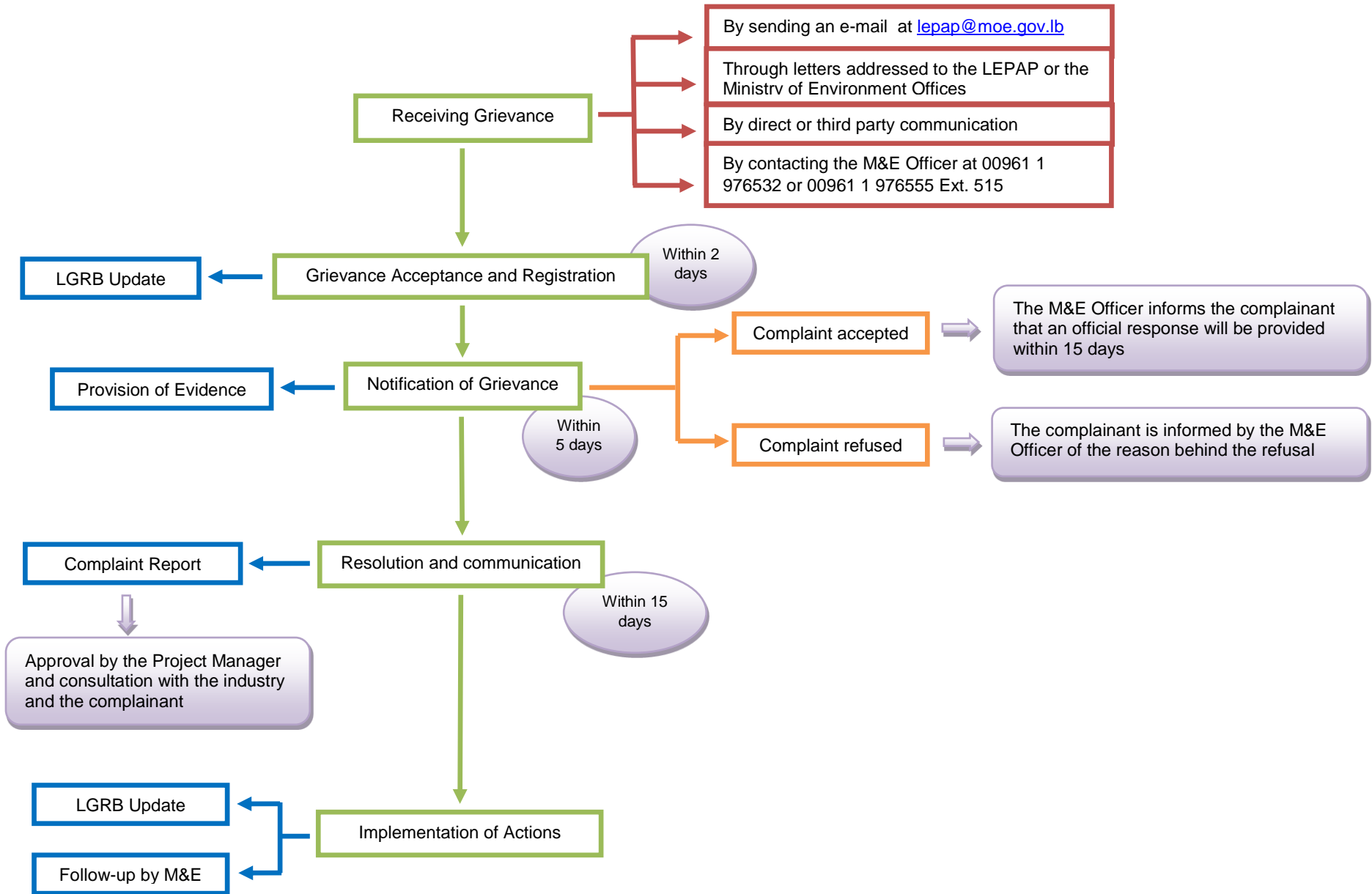
*e. Actions initiated and implemented*

The complaint is considered to be solved once submitter of the grievance and the beneficiary both accept and agree on the action plan proposed.

Accordingly, the M&E Officer shall update the LGRB and follow-up on the implementation of the proposed action plan until the actions agreed upon are fully executed.

The timeline between the grievance acceptance and resolution and more specifically the issuance of the complaint report is 18 days. The consultation time may vary depending on each case.

The GRM process proposed for the LEPAP is presented in the figure below.



**ANNEX 1: LEPAP Grievance Log Template**



## GRIEVANCE LOG

*Industry Name*

| <i>No.</i> | <i>About the Complainant</i> |                 |                    | <i>About the Complaint</i> |                          |                      |                           |                    |
|------------|------------------------------|-----------------|--------------------|----------------------------|--------------------------|----------------------|---------------------------|--------------------|
|            | <i>Name</i>                  | <i>Position</i> | <i>GRM Adopted</i> | <i>Date Received</i>       | <i>Brief Description</i> | <i>Actions taken</i> | <i>Person Responsible</i> | <i>Date Closed</i> |
|            |                              |                 |                    |                            |                          |                      |                           |                    |
|            |                              |                 |                    |                            |                          |                      |                           |                    |
|            |                              |                 |                    |                            |                          |                      |                           |                    |
|            |                              |                 |                    |                            |                          |                      |                           |                    |
|            |                              |                 |                    |                            |                          |                      |                           |                    |
|            |                              |                 |                    |                            |                          |                      |                           |                    |

## **ANNEX 2: Complaint Form Template**

**COMPLAINT FORM**  
***LEPAP GRIEVANCE REDRESS MECHANISM***

| <b>A. CONTACT INFORMATION OF THE COMPLAINANT</b>   |  |
|--|--|
| Name:  |  |
| Position and Organization:   |  |
| Address:   |  |
| Contact number:  |  |
| E-mail:  |  |
| Please indicate how you prefer to be contacted (e-mail, mobile, etc.):                   |  |
| Do you request that your identity is kept anonymous?                                     | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>B. SUB-PROJECT INFORMATION</b>  |  |
| Beneficiary name :   |  |
| Type of project :  |  |
| Project location :   |  |
| <b>C. THE COMPLAINT</b>  |  |
| What harm do you believe the LEPAP financed project caused or is likely to cause to you? |  |
| Please include any other information that you consider relevant                          |  |

|   |  |
|---|--|
| Have you raised your complaint with the GRM of the concerned industry?  | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>If YES, please provide the following:</p> <p>(a) When, how and with whom the issues were raised?</p> <p>(b) Describe any response received from and/or any actions taken by the industry's GRM</p> <p>(c) Explain why the response or actions taken are not satisfactory</p> |  |
| <p>If NO, please provide the following:</p> <p>a) Why not?</p> <p>b) How do you wish to see the complaint resolved?</p> <p>c) Do you have any other matters or facts (including supporting documents) that you would like to share?</p>   |  |

**Date:**

**Signature of Complainant:**

Please send the complaint to:    LEPAP Office - Ministry of Environment,  
    Lazariéh Building - Bloc 2A, 7<sup>th</sup> Floor, Room 7-10/35  
    Beirut, Lebanon  
    Email: [lepap@moe.gov.lb](mailto:lepap@moe.gov.lb)

***Complaints may be submitted by mail, e-mail, or hand delivery to the LEPAP office or to the Ministry of Environment.***

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## **ANNEX 3: Complaint Report Template**

**COMPLAINT REPORT**  
**LEPAP GRIEVANCE REDRESS MECHANISM**

**Industry:** *(Insert the name of the industry, the sub-project financed and the location)*

**Complainant:** *(Insert the name and the position within his/her organization)*

**Complaint date:**

|   |  |
|---|--|
| <b>1. Complaint background :</b>                        | <i>Provide a brief description of the complainant declarations, evidences and requests.</i>  |
| <b>2. Brief on the GRM adopted :</b>                    | <i>Provide a brief description of the GRM process adopted.</i>   |
| <b>3. Brief on the outcomes of the investigations :</b> | <i>Provide the following information:</i> <ul style="list-style-type: none"><li><i>– Date of the field visit;</i></li><li><i>– Accuracy of the declarations;</i></li><li><i>– Add laboratory measurements results, as needed;</i></li><li><i>– Outcomes of the discussion undertaken with the industry representatives;</i></li><li><i>– Additional information as needed.</i></li></ul> |
| <b>4. Proposed Solutions :</b>                          | <i>Provide a table of the proposed next steps including, but not limited to, the following information:</i> <ul style="list-style-type: none"><li><i>– Proposed actions;</i></li><li><i>– Personnel in charge;</i></li><li><i>– Expected timeline;</i></li><li><i>– Expected cost;</i></li><li><i>– Proposed monitoring actions.</i></li></ul>   |

**Signature :**

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