Government of Lebanon[1]

Update of the Environmental and Social Management Framework (ESMF) of the Lebanon Environmental Pollution Abatement Project (LEPAP)

Beirut, Lebanon – November 2019

[1] LEPAP is a joint project of the Ministries of Finance and Environment and Banque du Liban

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List of Acronyms and Abbreviations

AF	Additional Financing
BAT	Best Available Technique
BdL	Banque du Liban
BOD	Biological Oxygen Demand
CAP	Compliance Action Plan
CDR	Council for Development and Reconstruction
COD	Chemical Oxygen Demand
EA	Environmental Audit
E&S	Environmental and Social
EFL	Environmental Fund for Lebanon
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
ELARD	Earth Link and Advanced Resources Development
EMP	Environment Management Plan
ESA	Environmental and Social Assessment
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FI	Financial Intermediary
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
IEE	Initial Environmental Examination
IFC	International Finance Corporation
LEPAP	Lebanon Pollution Abatement Project
MCE	Monitoring Compliance and Enforcement
MoE	Ministry of Environment
MoEW	Ministry of Energy and Water
MoF	Ministry of Finance
MoI	Ministry of Industry
MoPH	Ministry of Public Health
MTR	Mid-Term Report
OHS	Occupational Health and Safety
OMP	Odor Management Plan

PIF	Project Identification Form
PM	Particulate Matter
PMU	Project Management Unit
RPF	Request for Proposals
SCP	Sustainable Consumption and Production
SOER	State of the Environment Report
SPA	Specially Protected Areas
STP	Sewage Treatment Plant
TA	Technical Assistance
ToR	Terms of References
TSP	Total Suspended Particulates
TSS	Total Suspended Solids
UNDP	United Nations Development Programme
WB	World Bank
WHO	World Health Organisation

Update of the Environmental and Social Management Framework (ESMF) of the Lebanon Environmental Pollution Abatement Project (LEPAP)

1. Introduction

The Ministry of Environment (MoE) has demonstrated a strong commitment to tackle industrial pollution and encourage green investments during the past years through a combination of regulations and incentive tools. The Lebanon Environmental Pollution Abatement Project (LEPAP) is one of the initiatives created by the MoE and implemented through UNDP in coordination with the World Bank (WB), the Italian Agency for Development Cooperation (AICS), the Ministry of Finance and Banque du Liban (BDL) to promote the financial and environmental sustainability of the industrial sector in Lebanon. Eight industrial enterprises have borrowed so far under LEPAP to invest in pollution abatement interventions with a total disbursed amount of around USD /11,370,000/. The remaining LEPAP funds are fully committed and expected to be disbursed by end of March 2020 at the latest.

In order to respond to the industrial sector needs, the MoE has requested an Additional Financing (AF) of USD /50/ million from the WB in light of the current environmental challenges and the enforcement of the environmental legislation in the country and to build on the current support and capacity that was built within the current LEPAP project. The additional financing will expand in scope to include other types of establishments such as solid waste facilities, hospitals, pharmaceutical, laboratories, radiological facilities and veterinary clinics with permits and other classified establishments (as per Decree 4917 dated 24 March 1994, a classified establishment is any hazardous establishment that may cause health risk or disturbance to its surroundings). Classified establishments include among others petrol stations, farms, and storage facilities.

An Environmental and Social Assessment (ESA) was conducted in 2013 to serve as a basis to identify and assess the social and environmental risks and impacts of sub-projects, both beneficial and adverse; to determine the necessary mitigation measures; and to elaborate the necessary management plans to ensure that impacts are dealt with, mitigation measures are followed, and the entire program is monitored and evaluated. The mentioned ESA was considered as the equivalent to an Environmental and Social Management Framework (ESMF) since the subprojects could not be specified prior to appraisal.

This ESMF now supersedes and updates the ESA prepared in 2013 to reflect the additions and changes needed for the implementation of LEPAP-AF. The ESMF also considers lessons-learned from the implementation of LEPAP projects to date and makes recommendations for further capacity building to ensure all involved parties are able to fulfill their roles in the implementation of the Framework.

More specifically, the ESMF includes the following:

- Introduction
- LEPAP objectives, components, and eligibility criteria
- LEPAP Project Management
- Institutional capacity and legal framework assessment
- Environmental and social management procedures
- Summary of public consultation
- Appendices

2. LEPAP Objectives, Components, Eligibility Criteria and Management

2.1 LEPAP Objectives and Components

The objective of LEPAP is to reduce industrial pollution in targeted industrial enterprises and strengthen the monitoring and enforcement capabilities of the MoE through technical assistance and through establishing a financial mechanism for supporting pollution abatement investments.

The Project started in 2014 with an initial cost of US$ 18.0 million including Euros 2.3 million for Technical Assistance and US$ 15 million for investments in pollution management interventions and a duration of five years. To date, eight industrial enterprises borrowed under LEPAP to invest in pollution abatement interventions with a total disbursed amount of around US$11,370,000. The remaining funds are fully committed and expected to be disbursed by end of March 2020 at the latest.

In 2019, MoE has requested an additional financing of US$ 50.0 million in light of the current environmental challenges and increasing demand from industries, and based on the current support and capacity that was built within the current LEPAP project.

The envisaged components of the additional financing will mirror the current parent project and will consist of:

a) **Component 1: Technical Assistance (US$ 5 million)** to strengthen national capacity for pollution[1] management[2] through technical support and capacity building. This will be offered to all existing and new establishments[3] [4] to identify through relevant assessments which pollution prevention and abatement approaches would best reduce the current rates of pollution for an identified establishment. Technical support could include capacity assessments and gap analysis for companies to reach international accreditation and/or good practice (ISO 14001, 9001, 15001, 15003, 45001). This component will include Project Management costs for the Project Management Unit (PMU), operating costs (including communication, purchase of office equipment and supplies, local and international travel, technical and financial audits and vehicles) and any capacity building activities that may be deemed necessary;

b) **Component 2: Investments in Pollution Management (US$ 45 million)** includes providing concessional loans through the banking sector for pollution prevention and abatement measures identified in Component 1. These will include existing or new private establishments,

[1] The term "pollution" is used to refer to both hazardous and non-hazardous chemical pollutants in the solid, liquid, or gaseous phases, and includes other components such as thermal discharge to water, emissions of short- and long-lived climate pollutants, nuisance odors, noise, vibration, radiation, electromagnetic energy, and the creation of potential visual impacts including light.

[2] Pollution management includes measures designed to avoid or minimize emissions of pollutants, including short- and long-lived climate pollutants, given that measures which tend to encourage reduction in energy and raw material use, as well as emissions of local pollutants, also generally result in encouraging a reduction of emissions of short- and long-lived climate pollutants

[3] Classified establishments as defined in Decree 4917 of 24 March 1994) and industrial establishments (as per decree 5243 of 05 April 2001) that are eligible include:

i) Existing establishments that have permits
ii) Existing establishments that are in the process of applying for permits
iii) New facilities

[4] Licensed (registered) hospitals, medical waste, pharmaceutical, laboratories, radiological facilities, veterinary clinics, and solid waste facilities

including the construction and operation of establishments and associated facilities in the (i) industrial; (ii) agricultural (iii) healthcare and medical waste sectors and (iv) any other classified establishments, in order to bring them towards compliance with national environmental regulations in a cost-effective manner. The sub-projects could include pollution prevention, resource recovery, clean technology adoption, fuel substitution, waste minimization or end of pipe environmental control where no other alternatives are available. The Borrower will make available the proceeds of the Loan to BDL under a Subsidiary Agreement (management mandate) and provide sub-loans through participating banks on a first-come, first-serve basis and as long as the enterprise fulfils certain eligibility criteria. The BdL, acting as an Apex Bank, was the recipient of the World Bank loan of US$ 15 million, and will be the recipient of the additional USD$ 50.0 million. The funds will then be made available to interested participating commercial banks which will be responsible for channeling these funds, to LEPAP beneficiaries at an interest rate close to zero.

2.2 LEPAP Funding Flow and Eligibility Criteria

The eligibility criteria for enterprises to borrow money from the participating banks are as follows:

- Not on the exclusion list for LEPAP
- Classified establishments (as per decree 4917 of 24 March 1994) and industrial establishments (as per decree 5243 of 05 April 2001) that are eligible include:
  - I) Existing establishments that have permits
  - II) Existing establishments that are in the process of applying for permits
  - III) New facilities
- Licensed (registered) hospitals, medical waste facilities, pharmaceutical facilities, laboratories, radiological facilities (Facilities specialized in medical imaging to diagnose and treat diseases), and veterinarian clinics;
- Existing or new permitted solid waste facilities;
- Feasible technical and financial resource efficiency measures for improving efficient consumption of energy, water and raw materials, as well as other resources. Such measures will integrate the principles of cleaner production into product design and production processes to conserve raw materials, energy and water, as well as other resources;
- The sub-loan will not have a ceiling but a sub-project that exceeds USD$ 5 million will have to receive prior authorization from the World Bank;
- Enterprises should be creditworthy as determined by the commercial bank; and
- Enterprises should bear the loan guarantees requested by their bank.

2.3 LEPAP Implementation Arrangements

The primary project participants include the MoE, BdL, the banking sector and borrowing establishments including classified establishments, solid waste facilities and medical sector establishments. Their responsibilities are summarized in this section.

Ministry of Environment (MoE) including Project Management Unit (PMU)

The MOE is the environmental regulatory entity of the Government of Lebanon (GoL), and the LEPAP funds' management is delegated to MoE through the PMU. MOE is responsible to:

- Manage of the Technical Assessment (TA) funds
- Review and clear sub-projects according to the national applicable laws and regulations, meeting the requirements of the exclusion list, and fulfilling the WB safeguard policies;
- Prepare screening forms - Project Identification Form (PIF) and submit them for the approval of WB (see section 2.4)
- Issue approval of the environmental studies and the environment compliance certificate according to the applicable national laws and requirements. ESIAs would be officially submitted to MoE which would assign one specific committee for the review of all ESIAs related to LEPAP-AF. ESMPs would be cleared by the PMU after getting the approval of the LEPAP focal point.
- Issue approval of sub-projects that are less than USD 5 million
- Monitor and enforce the mitigation and monitoring measures in the sub-project specific environmental and social management plans on a regular basis (monthly during the construction phase and quarterly during the operation phase)
- Monitor the implementation of health and safety measures, Grievance Redress Mechanism (GRM), and Gender-Based Violence (GBV), and labor related conditions to ensure the concerned establishments are compliant with the WB standards.
- Prepare and submit withdrawal applications for signature by BDL
- Gather all supporting documents related to the expenditures incurred by the enterprises
- Prepare quarterly financial reports to be submitted to the World Bank
- Coordinate with the external auditor

Banking Sector

Project participants in the banking sector include BDL and participating commercial banks. Participating commercial banks will include commercial banks who lend LEPAP funds sourced through BDL.

- **Banque Du Liban (BDL)**

The role of BDL will be to (a) Review sub-loan applications before providing sub-loans in accordance with the Code of Money and Credit and their internal regulations; and (b) Manage the use of the proceeds of the loan.

BDL will meet its LEPAP roles and responsibilities through its Financing Unit comprised of head and deputy head of the unit along with the head of subsidized loans and financing program unit. The Financing unit will be responsible for managing the use of the proceeds of the LEPAP funds.

The general duties of the unit will include:

- Manage the special account of the World Bank and ensure timely calls for replenishment.
- Communicate the availability, purpose and lending terms of LEPAP funds to commercial banks and enterprises who may wish to access the funds;
- Coordinate the timely disbursement of LEPAP funds to commercial banks and enterprises that participate in LEPAP in accordance with agreements with those banks and enterprises.
- Ensure timely repayment of LEPAP funds from both the enterprises and the commercial banks to whom it makes loans;
- Maintain close coordination with the PMU to ensure the timely transmission of financial, creditworthiness and other data to the PMU in accordance with project requirements;
- Coordinate with the World Bank, MOE, other BDL units/divisions, participating banks and other involved parties as necessary to ensure the efficient and effective use and management of LEPAP funds;

Specifically, the unit will undertake the following duties:

- Open and manage a Special Account into which to transfer funds from the WB and from which to make disbursements to participating commercial banks and to participating enterprises;
- Market LEPAP funds to commercial banks;
- Maintain electronic and paper filing systems that include all relevant documents, invoices, records of loans and loan repayments and other information for all enterprises for whom it performs creditworthiness checks and to whom it lends LEPAP funds;
- Use a computerized accounting system to manage, track, and supervise all LEPAP funds and LEPAP loans;
- Prepare and update, as necessary, overall and quarterly disbursement schedules for each client enterprise participating in LEPAP;
- Process debits from the LEPAP Special Account in accordance with relevant documents;
- Record all transactions involving LEPAP funds;
- Budget LEPAP resources to ensure that LEPAP loan demands are met on a timely basis.
- Report, through the participating agreement with the Commercial Banks, all LEPAP transactions to the PMU, and provide supporting documentation upon request;
- Liaise with the PMU to share information to confirm that goods financed by LEPAP are in compliance with specifications, quantities, purchase orders and contracts;
- Prepare applications to replenish the Special Account and forward these to the World Bank.
- Conduct due-diligence follow-up with participating commercial banks to verify that appropriate accounting procedures, filing and data management systems, and accountability procedures are in place to protect loans and to ensure proper financial management and repayment of loans;
- Capture sufficient details of all transactions to allow their proper presentation in financial reports;
- Provide financial project data to the PMU in accordance with schedules agreed with the PMU to ensure that the reporting deadlines of the project are achieved;
- Inform the commercial banks of this project, and negotiate and sign Participating Agreements, as needed, to supply the interested banks with LEPAP financing resources. LEPAP resources will be made available to participating banks with the inclusion of the following clause in the agreement document: “Loans made under the Lebanon Environmental Pollution Abatement Project (LEPAP) will require that the beneficiary enterprise will send to the World Bank all supporting documents concerning the performance of contracts, and grants authority to the World Bank to transmit the same to the LEPAP financer”
- Inform the World Bank of the participating commercial banks and the respective contact person and information as needed.

The project will ensure in having a Financial and Administrative Management Specialist (as part of the PMU) to manage the Project’s FM procedures which will increase the FM capacity of the proposed project and enhanced control procedures over payments. In addition, BDL has strong internal control based on what has been described previously. The internal audit and inspection department is responsible for the internal audit and inspection procedures at BDL, including records, operations, assets, and accounts. It suggests measures for the improvement of administration.

BDL will undertake not to establish business relationships under LEPAP with customers who are included on the lists of BDL, United Nations, the European Union (EU) and EU member states in relation to fraud, embargoes or the fight against terrorism.

The updated lists and further reference are available on the Internet under the following addresses:

- United Nations: http://www.un.org/Docs/sc/committees/1267/1267ListEng.htm

European Union: http://ec.europa.eu/comm/external_relations/cfsp/sanctions/list/consol-list.htm

- **Participating Commercial Banks:**

The responsibility of *participating commercial banks* is to ensure the proper management of project funds for investment in sub-projects. *Participating Commercial B*anks will make their own organizational arrangements for participating in LEPAP or will manage LEPAP loans through their existing arrangements.

The roles of participating commercial banks are to:

- Sign a participating bank agreement with BDL for managing the funds in accordance with the World Bank policies and regulations, with the exception of the environmental and social requirements for which the responsibility rests with the MoE and the PMU to clear E&S studies;
- Open and manage accounts for the proceeds of LEPAP funds from BDL;
- Adhere to LEPAP project conditions and on-lending agreements with BDL regarding minimum duration of loans;
- Assess the creditworthiness of enterprises that present a potential sub-project for financing under LEPAP and communicate the results to each LEPAP applicant and MoE/PMU;
- Liaise and follow up with the PMU so that the sub-borrower meets all the technical and safeguard requirements;
- Negotiate and sign with the sub-borrower the sub-loan agreement;
- Exercise due diligence with the BDL/PMU at various stages of the process to ensure: (i) project viability; (ii) investment costs are based on true pro-format invoices; (iii) goods have been effectively delivered; and (iv) payments are made directly to the supplier; in line with the PMU's technical approval;
- Maintain electronic and paper filing systems that include all relevant documents, invoices, records of loans and loan repayments and other information for all enterprises for whom they perform creditworthiness checks and to whom they lend LEPAP funds;
- Provide financial project data to the PMU and BDL in accordance with schedules agreed with the PMU and BDL to ensure that the reporting deadlines of the project are achieved;
- Communicate the availability, purpose and lending terms of LEPAP funds to enterprises who may wish to access the funds;
- Coordinate the timely disbursement of LEPAP funds to enterprises that participate in LEPAP;
- Ensure timely repayment of LEPAP funds from enterprises that take out LEPAP loans;
- Maintain close coordination with the PMU to ensure the timely transmission of financial, creditworthiness and other data to the PMU in accordance with project requirements;
- Coordinate with the WB, MoE, BDL and other involved parties as necessary to ensure the efficient and effective use and management of LEPAP funds.

Participating banks could also have a role in Environment & Social (E&S) screening, due diligence and monitoring subject to them having the needed capacity and resources to fulfil these roles. The project will provide capacity building in these areas to the participating banks.

Borrowing establishments:

Borrowing establishment that participate in LEPAP will benefit from attractive financing to meet pollution prevention and abatement objectives and meet regulatory compliance requirements. In addition, they may benefit from technical assistance, positive public recognition of pollution prevention and/or abatement actions and (depending on the sub-project they implement) reduced energy and/or materials costs, improved productivity, and/or recovery of a recyclable product.

Establishments that use project funds must prepare and implement pollution prevention and abatement sub-projects in accordance with the objectives of the project.

The responsibility of the borrowing enterprises is to:

- Provide sufficient technical and financial data to the participating bank concerning a proposed sub-project to permit a creditworthiness check of the enterprise with respect to the sub-project;
- Prepare and obtain approval on the required environmental and social studies that will be done in accordance with applicable national laws and regulations as well as World Bank safeguards as applicable; LEPAP will continue supporting the preparation of the E&S studies through its TA component;
- Obtain required certificates/licenses as applicable;
- Undertake detailed design, feasibility or other environmental and social studies as applicable and prepare the necessary engineering and other designs to determine the feasibility of the proposed sub-project in accordance with project criteria and provide these to the PMU for evaluation;
- Negotiate and sign the sub-loan agreement with the participating bank;
- Work with the PMU (or its consultants) as necessary to ensure that a proposed investment will achieve desired pollution prevention and/or abatement impacts;
- Undertake procurement of works, goods and services in accordance in best commercial practices;
- Ensure (i) project viability, (ii) investment costs are based on true pro-format invoices, (iii) goods have been effectively delivered, and (iv) payments are made directly to the supplier; in line with the PMU's technical approval;
- Operate and maintain LEPAP investments in accordance with good practice, manufacturer recommendations and equipment/parts replacement requirements in order to ensure that LEPAP investments achieve and maintain their pollution abatement objectives;
- Provide necessary budget to ensure proper operation and maintenance;
- Undertake self-monitoring in accordance with agreements with the PMU sufficient to demonstrate the pollution prevention and abatement results of the LEPAP investment;
- Provide data and information to the PMU regarding the implementation and operation of LEPAP investments;
- Maintain records of all:
  - tender documents including specifications, quantities, performance standards and other tendering details;
  - companies invited to bid on works, goods and services;
  - bids received;
  - bids accepted;
  - Evaluation documents;
- Make all financial records available, upon request, to BDL, MOE and auditors of LEPAP investments.
- Facilitate verification monitoring by MOE of pollution prevention and abatement achieved through the LEPAP investment.

2.4 Application Process

The Application Process includes 11 steps described in Table 2-1.

Table 2-1 LEPAP Application Process and Responsibilities

Step		Details	Responsible parties
1	Assessment of the establishment creditworthiness	The credit worthiness assessment of the establishment will be conducted by a participating bank and LEPAP PMU will be informed of the result. In the case of a negative outcome, the sub-	Participating bank

Step		Details	Responsible parties
		loan will be rejected. In the case of a positive outcome the PMU proceeds with the preparation of the Sub-Project Identification Form (PIF) (Appendix C).	
2	Preparation of a Project Identification Form (PIF)	A PIF is sent to the World Bank in order to (1) summarize the proposed sub-project (2) validate that the required environmental studies are in line with the WB safeguards requirements Following the screening and No Objection of the World Bank, steps 3, 4 and 5 shall be initiated in parallel.	LEPAP PMU
3	Development of technical specifications and bidding documents	The concerned establishment shall undertake the responsibility of the sub-projects' procurement in view of reaching a final technical and financial proposal for the planned sub-project. The final proposal should be submitted to LEPAP for review and approval. The establishment shall carry out the following activities: • Preparation of tender documents i.e. Request for Expression of Interest (REoI), Request For Proposals (RFP),Terms of Reference (ToRs); • Preparation of potential suppliers list including contact information and references' checks; • Requesting expressions of interest and lists of qualifications and similar executed projects; • Requesting technical and financial offers from potential suppliers and following up with them as needed; • Identification of selection criteria and evaluation of submitted offers; • Undertaking a pre-selection of the best two or three offers; • Negotiations of the pre-selected offers including sub-projects' implementation schedule; • Selection of the final offer; • Following up on the signature of contract with the selected supplier as needed.	Borrowing establishment
4	Preparation of ESIA or ESMP as applicable	The PMU prepares in coordination with the Establishment the required safeguard instruments as defined in the Sub-Project Identification Form which are summarized below: For Sub-Projects in Existing Establishments: ✓ ESIAs are required for sub-projects that fall under Annex 1 of Decree No. 8633; ✓ ESMPs are required for sub-projects that fall under Annex 2 of Decree No. 8633; ✓ E&S screening by MoE is required for sub-projects which are not classified in Annexes I and II of Decree No. 8633. For sub-projects in new Establishments:	Borrowing establishment with the support of LEPAP PMU

Step		Details	Responsible parties
		✓ ESIAs are required for New establishments that fall under Annexes 1 and 2 of the Decree No. 8633; ✓ ESMPs are required for New Establishments that fall under category III of Decree No. 5243/2002 and category III of Decree No. 4971/1994 or any other establishment which is not listed in Annexes I and II of Decree No. 8633. For existing establishments, the ESIA and ESMP are executed at the level of the sub-project and shall target the environmental and social impacts of the sub-project and the recommended mitigation measures. They should also address the labor and occupational health and safety matters at the level of the facility. For new establishments, ESIA or ESMP shall be prepared for the whole facility including the sub-project. ESIAs should be officially submitted to MoE which would assign one specific committee for the review of all ESIAs related to LEPAP-AF while ESMPs should be cleared by the PMU after getting the approval of the LEPAP focal point.	
5	Preparation of EA as applicable	For Sub-projects in existing facilities, if the facility falls under Category I, II or III establishment as per the industrial classification (Decree No.5243), or Categories I and II of classified establishments (Decree No. 4917), or is a hospital or any other healthcare facility or a solid waste facility, it will need to prepare an Environmental Audit (EA), unless the establishment has already prepared one. If possible, EA and ESIA/ESMPs should be prepared in parallel. However, in case of limited resources, priority should be given for the preparation of the ESIA/ESMPs at the level of the sub-project.	Borrowing establishment with support from PMU
6	Evaluation and approval of the sub-project and notifying the enterprise and participating bank	Following the preparation and submission of all required documentation described in the steps above, sub-projects meeting the eligibility criteria will be approved, and notified. The BdL and participating bank are also notified to sign a sub-loan agreement with the considered establishment	PMU and MoE
7	Sub-Loan Agreement negotiation	The participating bank will undertake final creditworthiness verification, as appropriate, based on the final proposed sub-project. The enterprise and the participating bank will negotiate a sub-loan agreement in accordance with the normal procedures of the participating bank and the enterprise. The lending terms and conditions of the sub-loans will be reflected in the sub-loan agreements (based on the Loan Agreement and its attachments and the BDL related circulars). The lending terms are reflected in the respective BDL circulars in a way to ensure that the interested establishments will benefit from close to 0% interest rate, on one hand, and put in place a setup	Borrowing establishment and Commercial bank

Step		Details	Responsible parties
		allowing the repayment of the sub-loan on the other hand. Sub -loan agreements will include relevant technical documents that obligate the enterprise to use the loan for the pollution prevention and/or abatement investments for which the loan is intended. These documents will include reference to the LEPAP related design, equipment, procurement, equipment performance, environmental self-monitoring, and environmental and financial reporting associated with the loan. The Participating Bank submits the negotiated sub-loan agreement to BDL for review and approval. Sub-loans must be fully disbursed to enterprises before the closing date of the project.	
8	Sub-project implementation	After acquiring BDL's approval the enterprise starts implementing the sub-project. The enterprise will be responsible for implementing the sub-project in accordance with its agreements with the PMU and the participating bank. Procurement in support of sub-project implementation will reflect the principles of economy, efficiency, fairness, and transparency: • Economy: Procurement should not be unnecessarily complex or expensive to undertake. • Efficiency: Procurement should ensure that supplies are provided that meet technical requirements / criteria at the lowest cost that may reasonably be achieved. • Fairness: The procedure for awarding a supply contract will be the same for all bidders (whether locally based or not), no bidder will receive special consideration and no bidder will benefit from information that has not also been made available to all other bidders. • Transparency: Decision-making related to procurement should be documented against pre-established criteria; all documents and records of decisions related to procurement should be available for inspection by the appropriate project authorities. Procurement will be undertaken in accordance with well-established private sector procurement methods or commercial practices that are acceptable to the World Bank. A procurement manual has been developed by the PMU to support LEPAP beneficiaries in the procurement process as needed.	Borrowing establishment
9	Self-Monitoring and reporting	Enterprises will self-monitor the emissions/discharges associated with their LEPAP financed investments. The enterprises will submit semi-annual monitoring reports to PMU/MOE covering the sub-project financed under LEPAP.	Borrowing establishment
10	Follow-up and supervision	The principal amount of loans that are repayable under the LEPAP initiative are linked to compliance with environmental objectives. The communication of compliance with environmental objectives will be undertaken as follows:	MoE/ PMU

Step		Details	Responsible parties
		• Following approval of a LEPAP loan, the PMU Project Manager will coordinate with relevant entities in MOE to establish the environmental monitoring schedule associated with the loan in line with the monitoring plan of the ESIA or ESMP as applicable including parameters to be monitored and the monitoring frequency for the duration of the loan; • The PMU will undertake monitoring in coordination with MOE on monthly basis during construction phase, and quarterly basis during operation phase, and as needed in case of complaints; • The PMU will coordinate with the appropriate MOE entity to review the self-monitoring reports as needed; • Following monitoring visits the PMU Project Manager will communicate any remarks to the concerned establishment and set a deadline for mitigating them. BdL and the commercial bank shall be informed in case of major non-compliance to take appropriate actions.	
11	Loan repayment	The enterprise will repay the LEPAP loan on the basis of the full loan principal, interest and according to the loan repayment schedule that it negotiates.	Borrowing establishment

Failure to comply with the financial and technical terms of the sub-loan and its annexes will trigger the following actions:

- Suspension of the environmental compliance certificate, as per the Environmental Compliance decree (8471/2012)
- Suspension of the incentives provided within BDL respective Circulars, in cases of major non-compliance
- Application of penalties as per Lebanese legislation

The process is summarized in Figure 1.
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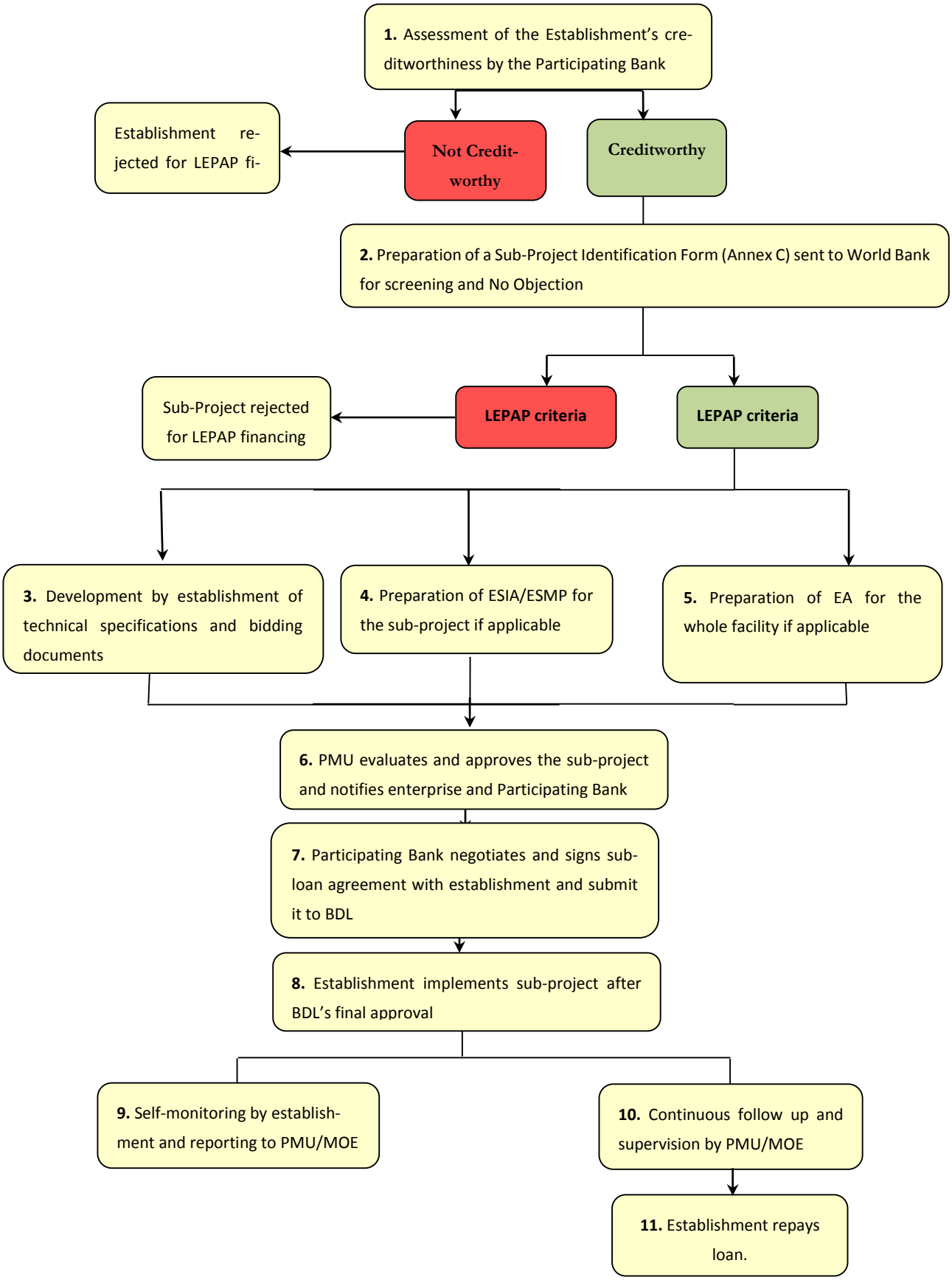

Figure 1. LEPAP Application Process

2.5 Programs Parallel to LEPAP

The MoE has coordinated with the StREG project to conduct the following:

- Preparation and issuance of the Application Decree No. 167 dated 17/2/2017 on "Application of Article 20 of the Environmental Protection Law No. 444 dated 29/7/2002" (Tax incentives for environmental activities);
- Implementation of all activities related to the permitting and monitoring of industrial establishments;
- Update of the national environmental standards on air emissions and wastewater.

2.6 LEPAP Parent Project: 2014-2019

Since the initiation of LEPAP, the PMU was established and is comprised of a project manager, a procurement officer, and a monitoring and evaluation officer. LEPAP has financed 15 sub-projects where 10 were financed by the WB and 5 got parallel financing through BdL. The total disbursed amount to date is US$ 11,403,967with 5 projects being currently fully operational as summarized in Appendix A with the E&S studies prepared for each project. The technical assistance provided to all WB financed projects focused mainly on the technical evaluation, and the impacts assessment and action or management plans. The main covered sectors focused on: food, paper, and minerals. The types of interventions were mainly focused on:

- ✓ Cleaner production
- ✓ Air emissions reduction
- ✓ Resource efficiency and recovery
- ✓ Industrial Wastewater treatment
- ✓ Waste minimization

These projects are predicted to have positive impacts on the environment and the occupational health and public safety, it is estimated that there will be reduction in air emissions, reduction in discharged untreated wastewater and reduction in produced solid waste, and improvement to the ambient air quality and water and soil quality. Additionally, resources are more efficiently used and recovered at theses financed establishments.

3. Institutional Capacity and Legal Framework Assessment

3.1 Institutional Assessment

The capacity of the various project participants in managing E&S risks has improved since LEPAP first started in 2014 mostly through learning by doing. Capacity assessment of the various entities is provided in this section.

Ministry of Environment (MoE) including the Project Management Unit (PMU):

Part of the PMU team has remained the same since its inception and therefore the institutional memory is maintained and capacity of the relevant PMU staff has significantly increased since the team started working on LEPAP. The team is capable of screening sub-projects for the need of E&S safeguards, conducting due diligence and monitoring implementation of E&S management plans.

MoE staff is also involved particularly when sub-projects trigger Annex I or Annex II of EIA decree (8633/2012) and hence require either an Environmental Impact Assessment (EIA) or Initial Environmental Examination (IEE) to be reviewed and approved by the ministry. With the AF lending being significantly more than the parent project and the need for establishments in this regard is rising, a well-structured PMU that is not understaffed is needed and sufficient funds are also highly needed for the TA component.
Nevertheless, so far even though PMU is understaffed, the unit is managing to monitor all sub-projects as per WB requirements.

Banking Sector:

Participating commercial banks are still not directly involved in the management of E&S risks and implementation of safeguards, which are still handled by the PMU. However since the launching of LEPAP, it is noted that several Lebanese commercial banks have significantly improved their capacity in managing the E&S risks of their portfolios, and many have now an operational Environmental and Social Management System (ESMS) that is implemented through competent E&S personnel. There is nevertheless great variability in the level of capacity of the banks, with some being very advanced in E&S management and others with no capacity at all. As the LEPAP portfolio increases, it is likely to be more sustainable and effective to transfer E&S responsibilities from the PMU to the commercial banks. Hand-over of such responsibilities would be gradual and dependent on the capacity of each commercial bank. On-the-job training can be provided by the PMU to the commercial banks and gradually the PMU would start having a supervisory and due diligence role to ensure that the banks are properly implementing the ESMF.

Borrowing establishments:

Last but not least, beneficiaries in Lebanon generally have low awareness about the environmental impacts of their activities and limited capacity to manage E&S aspects associated with their facilities. It is important to continue raising environmental awareness through LEPAP and to provide targeted technical support to beneficiaries to be able to effectively implement the required E&S safeguards at sub-project level and at facility level, where applicable (for existing facilities). It is also very important to

ensure the facilities have the capacity to maintain and operate the implemented sub-projects in a sustainable manner and to provide technical support through training as needed.

3.2 Assessment of the Legislative Framework

Since the start of LEPAP Project in Lebanon in 2014, significant improvements in the legislative framework were made and significant progress by MoE for establishing the tools and instruments for strengthening the monitoring and enforcement and for which the PMU was partly involved in given that it was operational since early 2014.

Legal and regulatory instruments include: (i) the Ministerial decisions 260/1-2015 and 261/1-2015 related to the procedures for reviewing the Initial Environment Examination (IEE) and the Environment Impact Assessment (EIAs) reports; (ii) the law No. 251-2014 meant for environmental prosecution, based on which 6 district Environment Attorneys and 7 investigation judges for environmental issues were appointed in 6 Lebanese governorates; (iii) the Council of Minister's decree No. 3989-2016 for establishing the environment police composed of 40 staff; (iv) the Ministerial decision No. 189/1-2016 for establishing the procedures for environment audits and compliance necessary to comply with the decree No. 8471-2012 related to environment compliance to become mandatory by 2018, 2019 and 2020 for class I, class II and class III industrial establishments respectively as defined in the ministerial decision No. 539/1-2015 and decision No. 540-1/2015 related to compliance deadlines; and (v) the Ministry of Justice issued Decision No. 3330 of 2015 on experts and Magistrate reserves in all provinces, which includes environmental experts names (Environmental Engineering and Environment) based on an earlier request by the MoE to the Ministry of Justice to update the database of environmental court experts. In addition to the above, the various segments of the judicial body held a meeting on June 3, 2016, to discuss the activation of the application of environmental laws and regulations. The results of the meeting were endorsed by the Minister of Environment and the Chairman of the Supreme Judicial Council on September 22, 2016 at MoE. Present at the meeting were the chief of the issues, a representative of the public prosecutor and some judges, including two environmental lawyers.

The framework law 63/2016 for the protection of the Litani River was passed on October 29, 2016 and it includes a section on industrial pollution. The MoE is pursuing the process of asserting its full prerogatives and efficiently execute its obligations, as recently demonstrated with the introduction of regulatory instruments and the participation in the formulation of several strategies, plans and programs. More recently, the Law 28/2017 (Annex III) on government disclosure policy regarding public documents reinforces the disclosure of MoE's IEE and EIA. Furthermore, the Environmental District Attorney of the Bekaa sent additional summons in August 2016 to new industries requesting that they contact the MoE for complying with the provisions of the Environment Protection Law 444/2002 as well as the Environment Compliance Decree No. 8471-2012. This initiative catalyzed the move of two large food and beverage enterprises in LEPAP pipeline, i.e., Liban Lait and Kassatly Chtaura. Both companies applied for LEPAP TA and funding. Similarly, the MoE started the process of recruiting 25 out of 40 policemen as per Decree 3989/2016.

The MoE has been successful in putting in place some 'carrot and stick' mechanisms to reduce industrial pollution, which LEPAP is aiming to operationalize. While the carrot for industries is the free technical assistance, close to 0% interest loan available through commercial banks and environmental certificate and logo, the stick is the compliance deadlines (Decision No. 539-1/2015) issued by the MoE. In recent months, the MoE has offered additional incentives jointly with MoF through Decree No. 167/2017 involving potential tax reduction (e.g. up to 50% reduction in customs duty for industries undertaking environmentally friendly activities) and taken steps towards enforcement of the compliance decree. However, enforcement needs to be further strengthened with regular inspections and issuance of closure notices, in order to achieve the project development objectives of LEPAP.

Additionally, several laws have been issued in the past couple years that help strengthen the enforcement of environmental regulations in Lebanon, most notably these include the air quality protection law

(Law No. 78/2018), water law (Law No. 77/2018), the Integrated Solid Waste Management Law (Law 80/2018), and the hazardous waste management decree (CoM Decree 5606/2019).

All development projects, regardless of EIA classification, must adhere to the environment quality standards for air, water and soil (MoE ministerial decision No. 52/1/1996) as well as air emission standards and wastewater discharge (MoE ministerial decision No. 8/1/2001). These emission limit values are valid for all establishments as long as no specific regulations for single branches are given. Emission standards are given as mass flows and as concentrations. Appendix B provides relevant ambient and emission standards to the LEPAP project, mainly related to air emissions/ambient air quality and wastewater discharges/ambient water quality. These standards provide the basis to monitor the results of the LEPAP and its support to industries to comply with prevailing standards. Relevant international standards (particularly from IFC) are also provided, and can be useful in case certain gaps in the national standards are encountered. It is noteworthy that MoE is currently in the process of finalizing new Environmental Limit Values (ELVs) taking into consideration the principle of Best Available Technique (BAT).

Mechanisms for enforcement and their status are found in Appendix B, and are summarized:

- The Environment Protection Law No. 444 requires in article 42 that self-monitoring and auto control be established by polluting enterprises. This is not being applied with the exception of monitoring air emissions from cement/fertilizers industries and the treatment of infectious medical waste and waste-to-energy plants. Article 53 is related to the provision of an insurance policy against all risks threatening the environment by “every person exploiting a classified institution or using chemical products, harmful and/or dangerous is not being applied or monitored”. Penalties of infringement in accordance to the law (articles 59-62) include one month to one year in prison and a fine ranging between LP 2.0 million (US$ 1,400) and LP 10 million (US$ 7,000), are not being applied.
- In October 2016, the framework law 63/2016 for the protection of the Litani River was passed, with strict deadlines for polluters in the area to treat their wastewater before it is discharged to the municipal network which ends up in the river or directly in the river.

The main impediments to effective and meaningful implementation and enforcement of environmental and environment-related laws are due to the fragmentation among regulatory institutions, licensing agencies, and police authorities among others, at both the national and local levels of government, to the effect that no single institution can take enforcement actions effectively.

3.3 Corrective Actions

Identified gaps that were identified at the beginning of the project (based on the 2013 ESA) and status of corrective actions are summarized in Table 3-1 .

New challenges that are hindering a more efficient disbursement of LEPAP-AF sub-projects are also summarized in Table 3-2 along with the recommended corrective actions.

Table 3-1 Improvements of the gaps identified in the initial ESA

Field of intervention	Elements	Gaps	Corrective Actions	Improvement
Overall project Management	Senior Management Commitment	Absence of policy statement on industrial pollution control	MoE to prepare a policy statement highlighting proposed actions for establishing an industrial pollution management system.	Issuance of deadlines for Category I, II and III industries to comply with environmental standards as well as deadlines for industries along the Litani River.
	Establishment of a PMU	BdL does not have technical staff to manage the technical assistance component of LEPAP	PMU will be established with staff and resources.	PMU is established and fully operational, but it is understaffed.
	Mechanism of enforcement	Weak track record on monitoring and enforcement.	Procedures and Guidelines for Compliance Action Plans	CAP is part of the EA and its guidelines were developed within the EA guidelines.
			Procedures and Guidelines for inspection and enforcement	The LEPAP has developed a monitoring form and does monthly inspections during constructions and once every 4 months during operation. Additionally MoE has also developed an inspection report template.
	Provision of written guidelines	No guidelines are available for a Category FI	Guidelines to be prepared prior to project appraisal.	The ESMF provides the necessary guidelines.
	Division of roles and responsibilities	Roles are unclear concerning the functions of compliance, monitoring and enforcement.	Strengthening the capacity of the compliance team.	The LEPAP PMU is well-trained and competent.

Field of intervention	Elements	Gaps	Corrective Actions	Improvement
			Strengthening the capacity of the monitoring and enforcement team.	The LEPAP PMU is well-trained and competent. Additionally, efforts were done to also strengthen the capacity of MoE employees.
Safeguards and other environmental studies needed	Technical capacity of staff	EIA team is understaffed and specific TOR for EIA in specific sectors is not available. Major risk related to delays in review process since EIA decree stipulates fixed deadlines for MoE to issue official responses to applications, otherwise reports are considered acceptable.	Additional staff to be provided on a part-time basis from other services and administrative process to be streamlined to avoid delays in review process (particularly delay between registration of application and submission to MoE review committee).	The MoE had increased its technical staff with 27 staff with environment-related background and received approval from the CoM for another 12 staff. MoE is generally complying with regulatory deadlines to review IEE, Scoping and EIA reports. Environmental guidelines are available.
			Training to be provided.	Several trainings took place, and more trainings and capacity building activities are planned to be implemented.
			Specific sector EIA guidelines to be prepared.	Environmental guidelines are prepared by LEPAP for specific sectors.
	Allocation of resources	No allocated resources are provided for EA review, monitoring and follow up of EMP implementation.	Resources to be provided under the TA components of LEPAP and StREG, as well as from MoE budget	This has not been done, StREG and LEPAP did not provide the resources needed for EA review.

Field of intervention	Elements	Gaps	Corrective Actions	Improvement
	Harmonization of the national EIA system with those of the WB and EC	Lack of explicit disclosure of the EIA summary and Initial Environment Examination (IEE) to the public (public has the right to access the reports but the reports are not made openly available for review) Lack of consultation with stakeholders for IEE projects	Consultation and Disclosure to be mandatory for all projects in Annexes I and II of the national EIA system.	The reports are available on LEPAP website.
		Review of national standards and guidelines	Air and water quality (ambient and emission/discharges) to be reviewed.	New ELVs are in the process of being finalized by MoE.

Table 3-2 Identified Gaps for LEPAP-AF

Elements	Gaps	Corrective Actions	Responsibility
Political status in Lebanon	The relatively weak political will, the lack of resources, capacity and coordination between the administrations in enforcing environmental regulations.	Technical assistance component build enforcement capacity at MoE and local authorities as applicable. If the Environmental Police becomes operational, it should be a key target for capacity building. The Environmental Training for Municipalities and Municipal Police prepared by MoE with the support of UNDP is a good basis for such capacity building activities	PMU
Delays in the process	The lengthy process of processing pipeline candidates to completion, taking 2-3 years in major projects poses the risk that the disbursements would not take place within the timeline of LEPAP	Streamline the processing of applications to reduce delays by identifying bottlenecks and proposing improvements.	PMU, MoE, BDL and WB
PMU Resources	Understaffing of PMU compared to the project document and delays in access to external consultant services	Increase the number of PMU staff under the TA component and gradually build the capacity of commercial banks to undertake E&S screening, due diligence and monitoring activities under the supervision of the PMU.	PMU
Social aspects of the concerned establishments	Available GRM, labor conditions and health and safety measures at existing facilities are not currently assessed	Focus on the social aspects of the establishments during the preparation of environmental safeguard tools and/or other environmental studies and suggest mitigation measures as needed	Concerned establishment in coordination with PMU
Prioritization errors	Weaknesses in the results framework and indicators causing a lack of prioritization in the activities related to capacity building of MOE, MOI and in enhancing environmental awareness in industry	Modification and improvement of the used framework related to capacity building activities for MoE, MoI and awareness activities for industries (improvements have already been made since the MTR)	PMU, MoE and WB
Pipeline development	Some ambiguous issues in the LEPAP procedures and eligibility criteria that may have caused obstacles in pipeline development and confusion in communication.	Review of LEPAP procedures and eligibility criteria.	PMU (completed)

4. Environmental and Social Management Procedures

4.1 Environmental and Social Management Process

The aim of this section is to provide the necessary guidelines and procedures, in the form of an ESMF manual, to the FI, so that it can effectively manage the environmental and social risks related to LEPAP AF investments and satisfy the World Bank's Environmental and Social safeguards for which OP 4.01 is mainly triggered. It is not expected that LEPAP sub-projects will cause any involuntary taking of land resulting in relocation or loss of shelter, loss of assets or access to assets, loss of income sources or means of livelihood, or the involuntary restriction of access to legal designated parks and protected areas therefore the World Bank's Involuntary Resettlement Operational Policy OP 4.12 would not be triggered in this project. An overview of the different steps required to ensure compliance with OP 4.01 and the national regulatory system is illustrated in Figure 2 and Figure 3. The different steps are further described in this chapter with emphasis on providing sufficient guidance to the FI to manage the process.

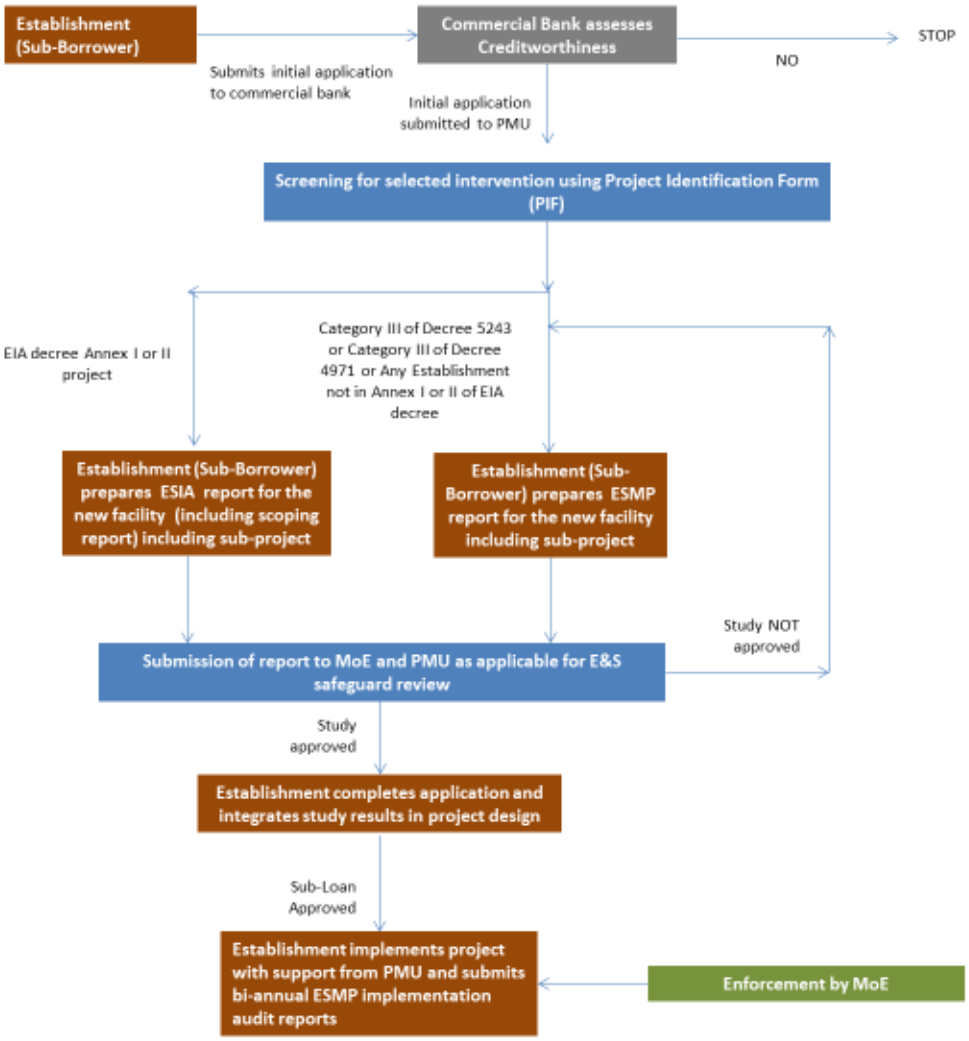

Figure 2. Schematic Diagram of the Environmental and Social Assessment Process for LEPAP for new establishment

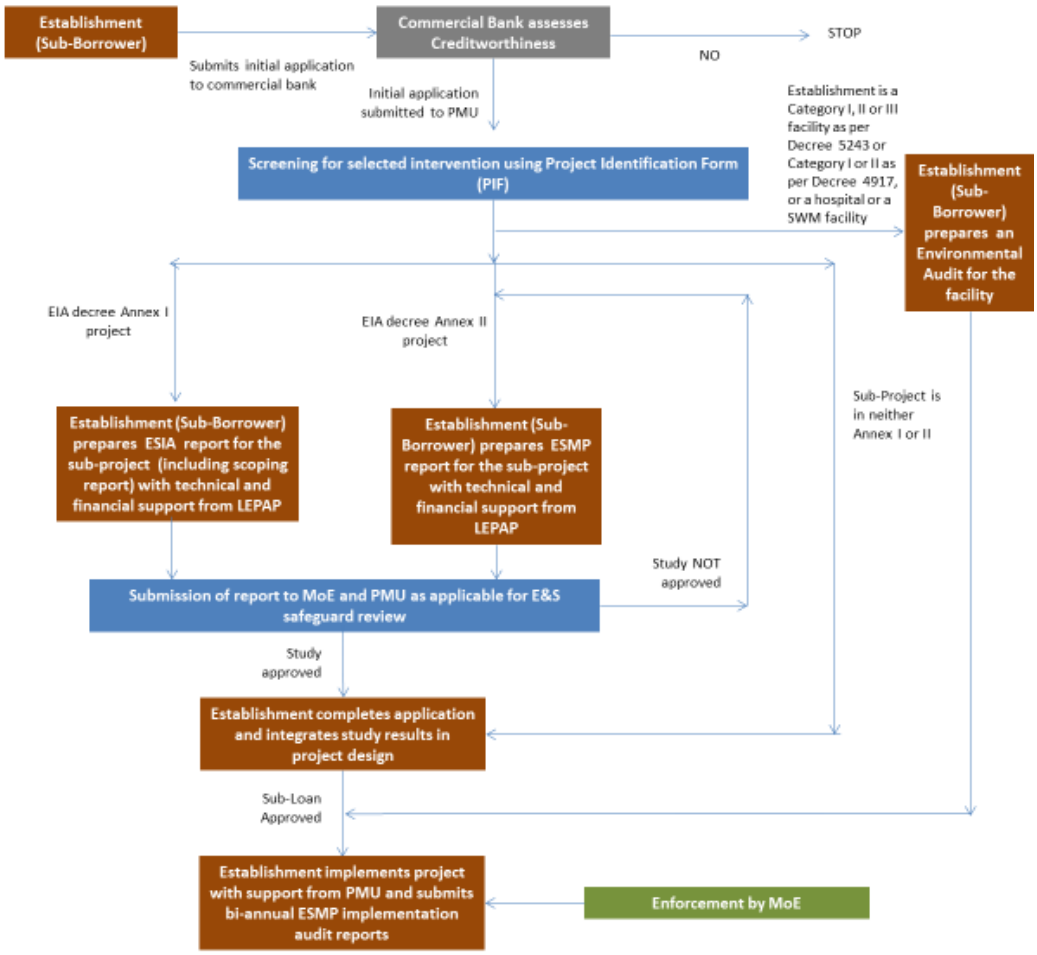

Figure 3. Schematic Diagram of the Environmental and Social Assessment Process for LEPAP for Sub-Projects within existing establishment

4.2 Environmental and Social Safeguards

4.2.1 Screening

Screening of LEPAP subprojects is a process by which a decision is taken on whether or not a subproject can be financed (exclusion list) and, subsequent risk screening leading to subprojects' categorization to determine whether an ESIA or an ESMP is required. The classification of the subproject depends on the nature, type, location, as well as the magnitude of its potential impacts.

1. Exclusion List

Potential LEPAP subprojects will be screened against the following exclusion list:

1. Production or trade in any product or activity deemed illegal under laws or regulations of Lebanon or international conventions and agreements.
2. Category A activities in accordance with the World Bank requirements.
3. Production or trade in weapons or ammunitions.[6]
4. Gambling, casinos and equivalent enterprises.
5. Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species (CITES).
6. Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where the radioactive source is considered to be trivial and/or adequately shielded.
7. Production or trade in or use of unbounded asbestos fibbers.
8. Any activities involving significant degradation or conversion of natural[7] and/or critical habitats[8] and/or any activities in legally protected areas.
9. Activities damaging to national monuments activities that are located in or impacting on areas with physical cultural property[9] attributes;

[6] This does not apply to enterprises that are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to an enterprise's primary operations

[7] Natural habitats are land and water areas where (i) the ecosystems' bio-logical communities are formed largely by native plant and animal species, and (ii) human activity has not essentially modified the area's primary ecological functions. All natural habitats have important biological, social, economic, and existence value. Important natural habitats may occur in tropical humid, dry, and cloud forests; temperate and boreal forests; Mediterranean-type shrub lands; natural arid and semi-arid lands; mangrove swamps, coastal marshes, and other wetlands; estuaries; sea grass beds; coral reefs; freshwater lakes and rivers; alpine and sub alpine environments, including herb fields, grasslands, and paramos; and tropical and temperate grasslands. Biodiversity outside of natural habitats (such as within agricultural landscapes) is not covered under this policy. It is good practice to take such biodiversity into consideration in project design and implementation.

[8] Critical habitat is a subset of both natural and modified habitat that deserves particular attention. Critical habitat includes areas with high biodiversity value that meet the criteria of the World Conservation Union (IUCN) classification, including habitats of significant importance for required for critically endangered or endangered species as defined by the IUCN Red List of Threatened Species; habitats of significant importance for endemic or restricted-range species; habitats supporting globally significant concentrations of migratory species and /or congregatory species; areas with unique assemblages of species or which are associated with key evolutionary processes. Primary Forests or forests of High Conservation Value shall be considered Critical Habitats.

[9] Also known as 'cultural heritage', 'cultural patrimony', 'cultural assets' or 'cultural property'. Physical cultural resources are

10. Unsustainable fishing practices such as electric shocks or explosive materials.
11. Production or trade in pharmaceuticals, pesticides/herbicides, ozone depleting substances, polychlorinated biphenyls (PCBs) subject to international phase outs or bans.
12. Production or activities involving harmful or exploitative forms of forced labor[10] or harmful child labor[11].
13. Activities involving land acquisition and/or restrictions on land use resulting in involuntary resettlement or economic displacement.[12]

2. Project Screening Form

The PMU prepares a Project identification Form (PIF), template in Appendix C, on behalf of the project proponent, and it is submitted to MoE and WB for approval.

3. Screening Categories

The category of the subproject will be based on the analysis of impacts consistent with the two screening lists attached as Annexes I and II in decree 8633/2012. The MoE categorization is essential in LEPAP categorization (High, Medium, Low), however other factors like social factors and OHS factors need to be considered when assessing project's requirements.

The following three categories will be used for existing establishments:

High: includes the list of sub-projects corresponding to Annex I of the national EIA decree and all solid waste establishment and medical sub-projects for which a detailed Environment and Social Impact Assessment (ESIA), is mandatory. Few LEPAP sub-projects will belong to this category namely: industrial waste water containing hazardous chemicals, or industrial and non-industrial solid waste management projects including those involving hazardous materials or significant transportation requirements for wastes. The ESIA report will be submitted for public consultation and disclosure.

Medium: includes a list of sub-projects corresponding to Annex II of the national EIA decree for which an Environmental and Social Management Plan (ESMP) is required. The majority of LEPAP sub-projects will belong to this category, namely small and medium size industrial waste water treatment plants containing non-hazardous chemicals, industrial solid waste projects containing non-hazardous materials, and water recycling projects. The ESMP will be submitted for public consultation and disclosure.

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defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other culture l significance. Physical cultural resources may be located in urban or rural settings, and may be above or below ground, or under water. Their cultural interest may be at the local, provincial or national level, or within the international community.

[10] Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty

[11] Employees may only be taken if they are at least 14 years old, as defined in the ILO Minimum Age Convention (C138, Art. 2), and ratified by Lebanon in 2003. Harmful child labor means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development

[12] Land acquisition and/or restrictions on land use that may result in the physical displacement of people (involuntary resettlement/ relocation or loss of shelter) as well as their economic displacement (as loss of assets or access to assets and/or means of livelihood, regardless of whether or not the affected people must move to another location). This includes the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. Land must be acquired on willing-seller willing-buyer basis.

Low: consist of sub-projects that are not in Annex I or Annex II and nor are located in an Annex III site for which an E&S screening is required. Projects in this category will have minimal or no adverse social or environmental impacts and will normally not require any environmental study.

In addition to the ESIA or ESMF or screening, existing establishments willing to benefit from LEPAP funds should also conduct an Environmental Audit according to the procedures established in MoE Decision 189/2016 if they fall under one of the below categories:

- Category I, II or III establishment as per the industrial classification (Decree No.5243)
- Categories I and II of classified establishments (Decree No. 4917)
- Hospital or any other healthcare facility
- Solid waste facility

For sub-projects in new facilities, the categorization applies to the new facility (including the sub-project) and not the sub-project alone. New establishments are categorized as follows:

High: includes the list of sub-projects corresponding to Annex I and II of the national EIA decree and all solid an medical waste establishment for which a detailed Environment and Social Impact Assessment (ESIA), is mandatory.

Medium: includes a list of sub-projects corresponding to Category III as per Decrees No. 5243 and 4917 or any establishment which is not classified in Annexes I and II of EIA Decree No. 8633 for which an ESMP is required.

Whenever the project is located in a sensitive area as per Annex III of the national EIA decree[13], the project would be reclassified into a higher risk category (if the project was initially classified as Medium Risk, it would be reclassified as High Risk, or if the project was initially classified as Low Risk, it would be reclassified as Medium Risk). Additionally, areas that meet the definition of sensitive areas, as per the World Bank' OPs, would also be classified in a higher risk category.

To facilitate decision-making on categorization of LEPAP subprojects by PMU, it was agreed to take the following actions:

i. Amend PIF to include decision-making on the requirements at the level of an establishment (audits) and level of the subproject (ESIAs/ESMPs), and to include financing new establishments and the types of studies required;

ii. Add to the PIF several key parameters that will allow PMU to conduct initial subproject E&S screening based on which to determine categorization and the required instruments (ESIA vs ESMP) based on the categories assigned after screening as described above;

iii. Ensure E&S expertise by retaining the services of a qualified environment and social specialist that has experience with environment and social safeguards of the World Bank are readily available at PMU so that E&S screening and preparation, review and monitoring of adequate instruments for each subproject is not delayed.

As part of an ESIA/ESMP Report, the ESMPs provide a critical link between measures to mitigate adverse impacts and the integration of such measures during the implementation and operation of projects.

[13] Annex III include sensitive areas including: areas categorized by laws or decrees as protected, areas that are habitats to endangered species, swamps, beaches, river banks, and springs, and Emirial Land.

They summarize the anticipated impacts of projects and provide details on the measures, responsibilities and scheduling to mitigate these impacts, costs of mitigation, monitoring and supervision.

4. Scope of the Screening:

The above classification applies to all new projects as well as to existing establishments. All new establishments will be screened whereas existing establishments will be also screened whenever there are:

a) **Expansions in capacity:** The expansion will have the same category as the existing facility unless the facility has prepared an ESIA report. In that case, the expansion of the same activity will have a less strict category given there is no change in the surrounding environmental conditions (example category II in case of an expansion in a category III facility that has prepared an ESIA report).

b) **A new component of the project:** The component will be classified based on the three screening lists as if it is a new project.

c) **Changing the production**: the change will be considered as a new project and will be classified on the basis of the three screening lists.

d) **In-process modification (changing the production pattern of machines or units) and in-plant modifications (any modifications in buildings, infrastructure)** will have a less strict category if such modification will improve the environmental conditions of the plant and would reduce its water and air emissions accordingly. Otherwise such in process modification will have the same category as the original facility for which an ESIAR was prepared.

5. Screening Process in LEPAP

Table 4-1 provides an overview of likely environmental study requirements for the different types of LEPAP-AF sub-projects to be implemented in existing facilities.

Table 4-1 Environmental Assessment Requirements of Potential LEPAP Sub-projects as part of Existing Facilities

Sub-projects	Potential Mitigation	Screening category	Environmental Assessment Requirements
Industrial Wastewater Treatment	• Physical, chemical and/or biological treatment	I	ESIA
Waste Treatment	• Anaerobic waste treatment with biogas/energy production • Sludge dewatering • Recycling (i.e. foam)	II	ESMP
	• Waste to energy systems or using wastes as alternative source of fuels	I	ESIA
Water Treatment	• Flocculation, settling, and sludge dewatering system	II	ESMP
Air emissions reduction and control	• Installation of air pollution control treatment systems (bag filters, ESP, etc.)	II	ESMP
Cleaner production and energy efficiency measures	• Raw materials recycling, water re-use within battery of plant, other measures within the facility	II	ESMP
Medical waste treatment	• Incinerator of Hazardous medical waste	I	ESIA
Hazardous chemicals storage	• Spill control and prevention system	I	ESIA

4.2.2 ESIA Requirements

A. Introduction

Based on the results from the PIF, if a sub-project was found to be categorized as high risk then an ESIA is required. The ESIA should take into account the social factors including the WB safeguards and OHS aspects and requires the following documentation:

a) Preparation of terms of reference for the ESIA report
b) Scoping report including consultation
c) Revised terms of reference on the basis of the scoping report
d) Draft Environment and Social Impact Assessment Report including public consultation and disclosure, and social aspects of labor safety, public health, and Gender-Based Violence (GBV)
e) Grievance redress mechanism (GRM), both internal and external
f) Final EIA report after its review by the MOE
g) Grievance and Appeal : Borrowing establishment has the right to appeal whenever MoE feedback on the ESIA is not satisfactory
h) Disclosure of the ESIA report
i) Self- monitoring Report on Construction and Operation

B. Responsibilities

The responsibilities for preparing and reviewing the above documentation are as follows:

(1) The MoE will be responsible for:

a) Review of the scoping report
b) Approval of the final TOR after the scoping report
c) Review of the draft ESIA report
d) Examination and decision of the Appeal by the Proponent
e) Supervision of the implementation of the Environment and Social management plan

(2) The Proponent (all concerned establishments including industries, hospitals, farms, etc.) will be responsible for:

a) Hiring the services of independent prequalified consulting firms
b) Conducting project scoping including consultation with the project affected people and stakeholders
c) Submitting the scoping report to MOE for approval
d) Revising the TOR based on the results of the scoping report
e) Conducting the ESIA process based on the revised TOR and including public consultation and disclosure
f) Preparing and submitting to the MOE the self - monitoring report
g) Implementing the conditions the Environmental Compliance Certificate

(3) The PMU will have the responsibility for:

a) Acting as a facilitator between the proponent, the MoE and the World Bank during the ESIA preparation
b) Technical assistance including assistance in the selection of the independent consultant, if required by the proponent
c) Finance from the LEPAP budget the preparation of the ESIA
d) Review the ESIA prior to its submission to the MoE
e) Ensure that the ESIA report is disclosed on the LEPAP and MoE websites prior to final approval of the investments of the sub-project
f) Ensure that the contract for civil work or the purchase and installation of the equipment are being implemented in line with the environment and social assessment;
g) Monitor the implementation of the environment and social management plan during project construction and operation

C. The scoping phase:

Scoping is an interactive process to identify the content, extent and relevance of the environment information to be submitted to the MOE as part of the ESIA procedure. Such interactive process should be between the proponent (establishments), the local administration AND the project affected people and stakeholders (local NGOs, media) of the project. The results of the scoping process are documented in a scoping report. The scoping report is an obligatory requirement as per MoE Decree 8633, for any project that requires an EIA. Where the scoping precedes the EIA to explain the scope of research on which the EIA will focus.

The Scoping Process:

After being notified by the MoE of the classification of the project, the Consultant hired by the PMU will start the scoping process and will prepare a Scoping Report including presentation of the project, its area of influence, the significant environmental issues, as well as the potential direct, indirect and cumulative impacts to be examined.

Invitations to the consultation meeting must be sent at most 10 days prior to the meeting. The same applies to the posting of announcements at the relevant municipality and at the project's site. The main stakeholders will be invited to participate in the consultation meeting, which can include concerned public institutions, ministries, municipality, nearby facilities or population. Additionally, women, environmental and social NGOs, should be invited and included in the Consultation meetings

Following the consultation meeting and after due integration of the findings from the consultation meeting in the scoping report, the proponent through the PMU will submit it to MoE; the contents of the scoping report are detailed in Annex 7 of the decree 8633/2012 with the following contents:

- A Non-Technical Summary in English and Arabic
- Description of the project, its cost and its implementation schedule
- Description of the project alternatives with "a no-project base option "considered
- Description of the physical environment and the area of influence likely to be affected by the project
- Description of the likely significant impacts (short term and long terms, positive or negative, direct, indirect and cumulative impact including the impacts on global environment) of the project
- Description of the framework for the mitigating and monitoring measures
- Summary of the public consultation including the remarks and feedback obtained from the public
- Revised ToR for the ESIA
- Indication of the timeframe, costs and resources needed to carry out the ESIA

In addition to the Annex 7 requirements, the WB requires including the social aspect by assessing the labor conditions if it is an existing facility, the health and safety measures that shall be implemented within the facility, flagging of any labor influx, and provide a code of conduct for GBV prevention measures and ensure and implement a robust GRM.

Review of the Scoping Report

Once received by the MoE, the screening team will review the scoping report and will convene a meeting which will include the MoE, the PMU, the proponent and its Consultant. The latter will be requested to make a presentation on the content of the scoping report and will address all the remarks and issues raised by the MoE. MoE should issue its official position on the scoping report within 15 days from registration of the scoping report by the proponent.

In case the scoping report is approved, the proponent will be required to proceed with the preparation of the ESIA report on the basis of the revised TOR and no additional or subsequent requirements will be provided by the MOE as the TOR will be considered final.

In case the scoping report is conditionally approved, the Consultant take into consideration the remarks of the meeting after which the TOR will be considered final and no additional requirements will be provided by the MOE.

D. The Environment and Social Impact Assessment (ESIA) Phase

The ESIA phase will start after that the proponent and/or its Consultant will receive the official approval from the MOE and will build on the scoping report. The purpose of the ESIA process is:

- Identify and analyze potential environment and social impacts and issues, both adverse and beneficial, associated with the proposed project.
- Identify measures to avoid, minimize, mitigate, or offset/compensate for adverse impacts on workers, affected communities, and the environment.
- Design an Environmental and Social Management Plan (ESMP) to address the mitigation, and monitoring of these adverse measures, as well as propose institutional measures to manage and monitor the adverse impacts and their remedial measures as needed.
- Ensure that the project affected people (PAP) and stakeholders are kept informed about the ESIA process and are consulted privately and publicly about the content of the ESIA report prior of its finalization.
- Identify specific self-monitoring reporting that the proponent would submit to the PMU and the MOE for the construction and operation phase of the investment project.
- Ensure that the investment contracts (civil works, purchase and installation of equipment) agreements) include appropriate, clauses to obligate the suppliers or contractors to comply with the associated elements of the ESMP and submit also progress reports as part of their contractual obligations.
- Disclose to the public the ESIA report and the executive summary which should be in English and Arabic languages.

The outcome of the ESIA phase is an ESIA report. This report should be concise and to the point addressing only major environmental and social issues. The main text should focus on investigation results, the conclusion, environmental and social management and monitoring plan, practical recommendations supported by summaries of the gathered information, and any approved references to explain and interpret such information. The detailed or unclear information is not appropriate in the main text, and should be presented in the annexes or in a separate document. The same applies to unpublished documents used in the ESIA study and they should be grouped in an annex.

The ESIA report which is further elaborated in Annex 8 of the decree # 8633/2012 must include the following:

a) Non-Technical Executive Summary in English and Arabic
b) Table of contents
c) Introduction
d) Policy, legal and administrative framework
e) Public consultation
f) Description of the proposed project
g) Description of the base line of the surrounding environment of the project and its area of influence

h) Limitation of the study
i) Potential environmental and social impacts of the project
j) Analysis of project alternatives
k) Environmental and Social Management plan
l) GRM
m) Labor conditions, and labor influx if applicable
n) Code of conduct for GBV prevention measures, if applicable
o) Self-reporting requirements during the construction and operational phases of the project
p) Conclusion
q) Annexes – minutes of public participation sessions
r) Summary of project documents
s) Tables and information statements
t) List of relevant reports
u) List of scientific and non-scientific references used
v) List of the names of those who prepared the ESIA report (individuals and institutions)

Content of the ESMP:

As part of an ESIA report, ESMPs provide a critical link between measures to mitigate adverse impacts and the integration of such measures during the implementation and operation of projects. They summarize the anticipated impacts of projects and provide details on the measures, responsibilities and scheduling to mitigate these impacts, costs of mitigation and monitoring and supervision. The ESMP should include:

- Summary of impacts: Predicted adverse environmental impacts and their relationship to social impacts (and any uncertainties about their effects) for which mitigation is necessary should be identified and summarized.

- Description of mitigation measures: Each measure should be briefly described in relation to the impact(s) and conditions under which it is required. These should be accompanied by, or referenced to, designs, development activities (including equipment descriptions) and operating procedures and implementation responsibilities. Public consultation should be clearly described and justified.

- Description of monitoring program: The ESMP identifies monitoring objectives and specifies the type of monitoring required; it also describes environmental performance indicators which provide linkages between impacts and mitigation measures identified in the ESIA report - parameters to be measured, methods to be used, sampling location and frequency of measurements, detection limits (as appropriate) and definition of thresholds to signal the need for corrective actions. Monitoring and supervision arrangements should ensure timely detection of conditions requiring remedial measures in keeping with good practice; furnish information and the progress and results of mitigation and institutional strengthening measures; and, assess compliance with national and Bank safeguard policies.

- Legal requirements and bidding and contract documents: The incorporation of detailed mitigation, monitoring and supervision arrangements into legal conditions and covenants is essential. It is good practice to ensure that implementation of major environmental requirements is linked to disbursement conditions. It is important to translate ESMP requirements into bidding and contract documents to ensure that obligations are clearly communicated to contractors.

- Institutional arrangements: Responsibilities for mitigation and monitoring should be defined along with arrangements for information flow, especially for coordination between agencies responsible for mitigation. This is especially important for projects requiring cross-sectoral integration. In particular, the ESMP specifies who is responsible for undertaking the mitigating and monitoring measures, e.g., for enforcement of remedial actions, monitoring of implementation, training, financing, and reporting. Institutional arrangements should also be crafted to maintain support for agreed enforcement measures for environmental protection. Where necessary, the ESMP should

propose strengthening the relevant agencies through such actions as: establishment of appropriate organizational arrangements; training; appointment of key staff and consultants; and, arrangements for counterpart funding and on-lending. For projects having significant environmental implications, it is particularly important that there be in the implementing ministry or agency an in-house environmental unit with adequate budget and professional staffing strong in expertise relevant to the project.

- Implementation schedule: The timing, frequency and duration of mitigation measures and monitoring should be included in an implementation schedule, showing phasing and coordination with procedures in the overall project implementation /operations manual. Linkages should be specified where implementation of mitigation measures is tied to institutional strengthening and to the project legal agreements, e.g. as conditions for loan effectiveness or disbursement.

- Reporting: Procedures for providing information on the progress and results of mitigation and monitoring measures should also be clearly stated. Recipients of such information should include those with responsibility for ensuring timely implementation of mitigation measures and for undertaking remedial actions. In addition, the structure, content and timing of reporting to the Bank should be designed to facilitate supervision and should establish arrangements for the timely receipt of monitoring reports and their forwarding to the Bank's environment specialists for review and comment.

- Cost estimates: These should be specified for both the initial investment and recurring expenses for implementing all measures defined in the ESMP, integrated into the total project costs and factored into financing negotiations. As mitigating costs may occur at points during project implementation or operations, indications of cash flow should be provided. It is important to capture all costs – including administrative, design and consultancy, and operational and maintenance costs – resulting from meeting required standards or modifying project design.

E. Public Consultation

The final draft ESIA report will be subject to public consultation. The PMU is responsible for the organization of the public consultation in collaboration with the Proponent's Consultant. The draft ESIA must be disclosed on LEPAP/MoE website 15 days prior to the consultation date.

The methodology and parties to be involved in the public consultation in the scoping phase should be the same for the consultation of the ESIA report.

The following will be presented at the Consultation meeting:

- An Executive summary in Arabic of the ESIA report which includes also the ESMP
- A power point presentation in Arabic of the results of the different sections of the ESIA report
  - A table to include all aspects and issues that have been raised during the public consultation meetings at the scoping phase and how ESIA report has addressed these aspects
  - The methodology that will be followed by the project proponent to ensure the continuity of the consultation process during the construction and operation phases of the project
  - The concrete actions and activities that the proponent will follow to improve the environment quality of the surroundings and the neighboring communities
  - The self- monitoring program that the proponent will establish to ensure that the adverse impacts will be mitigated and monitored

A summary of the issues and proposed solutions that were raised during the consultation meeting on the ESIA report.

F. Review of the ESIA report

The objective of the review is to verify whether the ESIA report meets the requirements of the scoping report, and thereby contains sufficient information to enable the MoE to make an informed decision on the acceptance of the ESIA report.

The ESIA report will be reviewed by the MoE using the World Bank guidelines for the preparation and review of the ESIA report. The World Bank will in parallel review the ESIA report and will communicate to the MoE its no objection or comments to be taken into consideration for its final no objection.

Three possible recommendations could be provided:

a) **An approval of the ESIA report**: In this case, the MoE will inform the proponent of its approval, and a copy will be sent to the PMU

b) A conditional approval of the ESIA report: In this case, the MoE will inform in writing the proponent of the additional information (that was missing from the scoping report). The MoE could also convene a meeting with the proponent to present the ESIA report and share their comments

c) A disapproval of the ESIA report: In this case the MOE will communicate in writing the substantive justification that lead to the rejection of the ESIA report with the provision that the proponent could appeal this decision to MOE within 15 working days from receiving the letter of disapproval.

G. Final conclusions and recommendations

j) Taking into account the appeal (Borrowing establishment has the right to appeal whenever MoE feedback on the ESIA is not satisfactory), the MoE will prepare for the signature of H.E. the Minister of the Environment the final conclusions and recommendation to and the proponent; a copy of the letter to be shared with the PMU.

H. Disclosure

After the ESIA process is completed, the ESIA report will be disclosed on the websites of the concerned establishment and LEPAP which are expected to be open to the public. Prior to disclosure, the proponent should indicate the section of the ESIA report that should not be disclosed because of national security, patents rights, intellectual property and proprietary technology, if applicable.

I. Appeal and Grievance System

The proponent has the right to appeal in writing within 15 working days against the MOE final decision in case the ESIA report is rejected. The proponent's letter will include the reasons for the appeal as well as the legal, scientific and technical reply to the objections raised by the MOE. H.E. the Minister of the Environment will appoint a MOE appeal committee which may request additional assistance of any specialized experts when carrying out its functions.

The appeal committee will review the facts and justification leading to MOE's rejection as well as the new evidence and additional explanation provided by the Proponent to respond to the objections of MOE. The committee will submit its report to H.E, the Minister of the Environment **within 15 working days**.

4.2.3 ESMP Requirements

A. Introduction

Whenever a LEPAP subproject is classified in a category II in Existing Establishments or new establishments, an Environmental and Social Management Plan (ESMP) is required. Typically, an ESMP is a relatively low-cost analysis that makes use of information already available. It is carried out using ESIA procedures and methods, which are scaled to purpose. For instance:

a) The institutional and legal framework should be briefly described In case of existing facilities only, but should be more developed whenever it is prepared for a new establishment and it focuses primarily on the legal and institutional aspects related to the project
b) A formal scoping is not required
c) In case of existing establishments, baseline data should be limited only to the necessary pollution parameters which significantly affect the environment within the project. This can be done through a survey on the site/measurements to obtain current environmental information. As for new establishments the baseline data will be based on available desktop information.
d) Key social issues can be identified by a rapid exercise, based on consultation with local people and agencies, while environmental issues should be based on pollution measurements (is cases of existing facilities) or modeling and estimation in case of new establishments
e) Analysis of alternatives will be limited to technical alternatives

An ESMP performs the following:

- Describe the project and the environmental setting;
- Consider technical alternatives to improve the environmental benefits;
- Address the concerns of the local community;
- Identify the potential environmental and social impacts;
- Identify measures to mitigate adverse environmental and social impacts; and
- Describe the environmental and social monitoring and management plans.
- Describe the consultation process

B. Preparation of the ESMP report

Once the proponent receives a copy of the ToR as well as its approval of the selection of the Proponent‘s Consultant, the Consultant will prepare the ESMP report whose content is summarized below and explained in Annex 6 of the national EIA decree.

The ESMP report will include:

a) A non- technical executive summary in English and Arabic
b) A short description of the project
c) A concise description of the institutional and legal framework
d) Analysis of the technical alternatives
e) Identification of Key Environmental and Social Issues
f) Analysis (qualitatively and semi quantitatively) of the environment and social impacts
g) An Environment and Social Management Plan (ESMP) by adapting/supplementing the mitigating measures
h) GRM
i) Minutes of Public Consultation
j) Conclusion

C. Content of the ESMP

The ESMP will follow the content described in the section of the ESIA requirements for category I above, however because it is expected that the impacts of the sub-projects by their severity and magnitude will be less significant than sub-projects in category I, generic mitigation measures can be adopted (refer to section 4.6). They will be adapted and if necessary supplemented by specific mitigating measures pertaining to the subproject. The ESMP would confirm whether these impacts are applicable and would supplement relevant mitigation measures to manage the identified impacts.

D. Review of the ESMP report

PMU will be reviewing and clearing the ESMPs after obtaining the approval of LEPAP focal point. Post review of a sample of subsequent projects will be conducted by the World Bank during its regular supervision missions.

E. Consultation, disclosure and appeal and grievance systems

The process for consultation, disclosure and appeal and grievance which were developed for category I subprojects will apply to the category II subprojects.

4.2.4 Facility-Wide Environmental Audit

Existing LEPAP beneficiary of Category I, II or III according to the Lebanese industrial classification (Decree 5243), Category I and II classified establishments (Decree 4917), and other types of establishments such as hospitals and waste management facilities are subject to an environmental audit (unless it has already a valid Environmental Audit) to verify its compliance with environmental standards. Based on the findings of the audit, an Environmental and Social Management Plan will be prepared where measures to address non-compliances, if any, and to enhance the environmental performance of the facility will be identified. The facility will commit to implementing the ESMP within a timeframe to be approved by MoE.

4.2.5 Occupational Health and Safety

The PMU and the Bank team are working on a continuous basis on OHS matters. All of LEPAP subprojects will incur OHS-related risks, including those classified as low risk. As such all beneficiary facilities will be subject to an assessment of its OHS performance mainly as part of the safeguard instrument preparation by the PMU and where needed, recommendations will be made for improvements or to address non-compliance with the World Bank's EHS guidelines.
It is important for all beneficiaries to have an emergency plan for firefighting prevention and control, and ensure that employees are trained on the health and safety measures that ensure their implementation.

4.2.6 Labor

The employees' conditions for possible beneficiaries should be assessed in the ESMP or ESIA. This includes the number of employees, working hours, their genders and nationalities, number of incidents and accidents recorded at the facilities, and the availability of trainings and health and safety measures. Additionally, it is important to anticipate any labor influx, although they are highly unlikely considering the scales of the sub-projects, to be able to limit its impact. An internal GRM should also be available for employees to express any complaints, see section 4.2.7.

It is crucial that the beneficiaries of LEPAP-AF take measures to implement the WB's GBV Good Practice Note, which focuses on two concrete facets: Sexual Exploitation and Abuse induced by labor influx and Sexual Harassment (SH) in the workplace. The Code of Conduct at the level of concerned establishments and measures to prevent GBV is found in Appendix D.

4.2.7 Grievance Redress Mechanism

LEPAP encourages the project proponents to have a Grievance redress mechanism for any internal or external complaints. The GRM can otherwise be developed at the level of the establishment as needed. The LEPAP GRM procedure is detailed in Appendix E, and can be summarized as follows:

- Receiving of Grievance: Stakeholders, employees, contractors and workers may submit the grievances through various methods. After reviewing the grievance, if it meets the eligibility criteria, it shall be recorded within 2 days of receipt by the M&E Officer;
- Grievance acceptance and registration: the complainant is informed of his grievance acceptance or refusal within five business days after submission, if it is approved the complainant is also informed that the respond will be communicated with him within 15 business days;
- Resolution and communication: following discussions with relevant stakeholders, the M&E officer prepares a complaint report, which includes the proposed actions and estimated implementation timeline. This report will then be approved by the Project Manager, and communicated with the complainant, who can disagree with the actions preformed. In this case, the M&E officer should arrange a meeting with the complainant and beneficiaries to reach an agreement;
- Actions initiated and implemented: The complaint is considered solved once submitter of the grievance and the beneficiary both accept and agree on the action plan proposed. And the timeline between the grievance acceptance and resolution and more specifically the issuance of the complaint report is 18 days.

Accordingly, the GRM is available in English and Arabic on the LEPAP and World Bank websites. The PMU will follow up and document all complaints associated with the sub-projects. It was agreed that:

- The PMU will continue to closely monitor subprojects under construction and will provide the Bank team with monthly reports including checklists, photographic documentation and a log of complaints from the GRM;
- The GRM will include anonymous complaints as part of project good practice, as long as the minimum amount of information is provided allowing for investigation.

To date there are no complaints registered on the LEPAP's parent project GRM which is available online (since 5 February 2019). Even though the availability of the GRM is always highlighted during the project's consultation meetings, the PMU will continue to raise awareness regarding the availability of this GRM through the overall communications strategy for the LEPAP project.

4.3 Potential Projects to be implemented under LEPAP-AF

In the initial project, a pipeline of 13 projects was preliminary identified in the following sectors to be candidates for LEPAP: the mineral, food, paper, plastic, metal products and chemicals sectors. The LEPAP-AF will expand in scope to include additional types of establishments such as solid waste facilities, hospitals, medical facilities, pharmaceutical facilities, laboratories, radiological facilities and veterinary clinics with permits, and other classified establishments (as per Decree 4917 dated 24 March 1994, a classified establishment is any hazardous establishment that may cause health risk or disturbance to its surroundings). Classified establishments include among others petrol stations, farms, and storage facilities. The types of subprojects which could be financed under the LEPAP-AF were also included in the PAD/legal agreement of the parent LEPAP project. Therefore, the same safeguard policies ahll be applied.

Table 4-2 shows a list of potential enterprises that have been identified for LEPAP-AF as potential new pipelines. The list clearly indicates that potential types of interventions (pollution abatement projects) are likely to include:

- ✓ Industrial wastewater treatment plants
- ✓ Hazardous material management
- ✓ Air pollution management
- ✓ Industrial waste management

Other types of potential projects include Sustainable Consumption and Production (SCP) interventions which include pollution prevention, resource recovery, clean technology, fuel substitution, and waste minimisation. The end-of-pipe treatment option shall be adopted only when no other alternative has been identified. These projects shall provide major benefits to the environment (improved air quality, reduction of pollution loads) as well as economic benefits (particularly in the case of energy efficiency or resource recovery projects) with minor negative impacts to the environment.

Table 4-2 Potential Establishments for LEPAP

No.	Name of beneficiary	Type of establishment	Location	Sub-Project	Type of intervention	Estimated cost (USD)
1	Benta	Pharmaceutical	Zahlé	Incinerator for cytotoxic waste	End-of-pipe treatment	3,500,000
2	Gandour	Industrial	Choueifat	Installation of a WWTP	End-of-pipe treatment	1,500,000
3	Sicomo	Industrial	Kab-Elias	Steam dryers Gluing and laminating machine	Energy Efficiency	640,000
4	Cortas	Industrial	Hosrayel	Installation of a WWTP	End-of-pipe treatment	360,000
5	Master Chips	Industrial	Ferzol	Installation of a WWTP	End-of-pipe treatment	1,500,000
6	Puriplast	Industrial	Eddé	Installation of a catalytic oxidizer	End-of-pipe treatment	1,000,000
7	Holcim	Industrial	Chekka	Installation of cyclone	End-of-pipe treatment	6,000,000
8	Malia Group	Industrial	Nahr Ibrahim	Installation of a WWTP	End-of-pipe treatment	300,000
9	Gemayel Frères	Industrial	Bikfaya	Installation of a WWTP	End-of-pipe treatment	365,000
10	AUB - Medical Center	Hospital	Beirut	Incinerator for medical waste	End-of-pipe treatment	1,000,000
11	LAU - St. John Hospital	Hospital	Jounieh	Incinerator for medical waste	End-of-pipe treatment	1,300,000
					TOTAL	**17,465,000**

4.5 Negative and Positive Impacts of Potential LEPAP interventions

The following negative and positive impacts are identified for each type of Intervention:

A. Industrial wastewater

In Lebanon untreated industrial waste water is discharged either in the ecosystem (wadis, water channel or via percolation, sea) or in the municipal waste water network. In many instances, untreated municipal and industrial wastewater are mixed together and are being used for irrigation and agriculture. Industrial wastewater includes many pollutants that when discharged into the environment can result in changes in its physical and chemical characteristics such as coloration, biological condition and can lead to disruption of the ecosystem.

More specifically the negative impacts of such industrial wastewater discharge practices are:

a) Human health: the wastewater contains trace elements, heavy metals and other pollutants that pose a risk to human health with the degree of risk that vary among age groups.

b) Occupational health: the workers handling the wastewater are also vulnerable to health risks due to long exposure periods to the trace elements, heavy metals and other pollutants in the wastewater.

c) Soil resources: as industrial waste may add nutrients, dissolved solids and heavy metals into the soil, some of these accumulate in the root zone with possible adverse impacts on soil. Long term use of industrial wastewater result in salinity and water logging leading to the overall reduction of the productive capacity of soils and lowering crop yields.

d) Groundwater: industrial wastewater could percolate and pollute ground water resources. Percolation of pollutants through the soil may cause degradation of the quality of groundwater resources which in Lebanon is used for drinking, irrigation and industrial use.

e) Ecology: whenever untreated industrial wastewater drains into the surface water, pollutants could cause negative effects to biodiversity.

f) Operation of municipal wastewater treatment plants: Lebanon is implementing an investment program of up to 28 primary and secondary treatment plants for municipal wastewater. Untreated industrial wastewater containing chemicals can negatively affect the treatment plants. The recent wastewater strategy of Lebanon has requested that industrial wastewater be pre- treated at the plant level before discharging into the municipal waste water network or into the municipal waste water treatment plant.

The positive impacts of treated industrial wastewater are as follows:

a) Improvement of public, occupational health and safety.

b) Reduction of pollution loads of TSS, BOD, COD and reduction of trace metals and heavy metals concentrations from industrial wastewater streams.

c) Improvement of surface water and groundwater quality and provision of a reliable source of water supply to farmers and to communities.

d) Preservation of the quality of aquatic habitats and ecological components and protection of biodiversity from inadequate wastewater disposal and management and accidental discharges to surface water bodies.

Low cost method for sanitary disposal of municipal wastewater and ensuring the proper operation and maintenance of the municipal wastewater treatment plants.

B. Hazardous material management:

Hazardous waste could cause health and environment risks in not handled properly. The negative impacts can include:

a) Occupational health and safety risks for workers handling the chemical material;

b) Public health risks from poor management or storage of hazardous materials;

c) Water and soil contamination in case of Spillage;

d) Discharges of hazardous materials into the ecosystem.

Incineration of Hazardous waste, if done in compliance with standards will have positive impacts on:

a) Saving energy: hazardous and non- hazardous waste can be burned as fuel in cement kilns reducing energy requirements in many manufacturing processes and lowering also the carbon footprint.

b) Reducing landfill uses by collecting solid waste materials with high calorific value.

c) Protection of the environment by avoiding the inappropriate disposal of industrial wastes in the ecosystem.

d) Improvement of public health, and avoiding health hazards caused by improper management of hazardous materials

Interim storage, management and treatment facilities for hazardous waste will have positive impacts if the implement proper storage and handling procedures:

a) Limit the risks of spillage

b) Reduce the risks of soil and ground water contamination

c) Improvement of OHS procedures

C. Industrial solid waste management

Industrial solid waste (hazardous and non-hazardous) generated at industrial facilities is typically mixed with municipal solid waste and is either abandoned in dump sites or possibly landfilled in the only two sanitary landfills in Lebanon. There is not yet any physical and chemical treatment facility or hazardous waste landfills in Lebanon. The major negative impacts related to the inadequate disposal of industrial wastes are:

a) Surface Water and soil pollution due to the mixture of the industrial chemicals with water and soil.

b) Soil and ground water pollution due to the hazardous material sent to landfills or improperly disposed of.

c) Groundwater pollution due to the percolation of the leachate deep into the ground.

d) Air pollution due to burning of hazardous and non-hazardous waste.

e) Harm to the health of communities living nearby the dump sites.

Minimizing waste though recycling existing waste will have positive impacts on:

b) Reduction in landfill use by collecting solid waste materials with high calorific value.

c) Protection of the environment by avoiding the inappropriate disposal of industrial wastes in the ecosystem.

d) Improvement of public health, and avoiding health hazards caused by improper management of hazardous waste

Cumulative and long-term impacts are difficult to estimate at this stage given the absence of precise information on the number and characteristics of sub-projects, which will be known only during the project implementation (number, size, implementation areas). However, the ultimate risks they may cause to the environment can be easily mastered by the implementation of appropriate mitigations measures concerning the application of environmental conditions relating to construction activities, wastewater and solid waste management, compliance with permitting procedures, operations, maintenance, and monitoring.

Table 4-4 provides an overview of potential impacts associated with different types of sub-projects above. The ESIA/ESMP studies should confirm whether such impacts are applicable and propose relevant mitigation measures to manage the identified impacts

Table 4-3 Potential Impacts

	Potential Interventions		*Potential Impacts on*					
			Surface Water Quality	**Soil & Groundwater**	**Ecology & Habitats**	**Air Quality & Noise**	**Socio-economy**	**Occupational Health & Safety**
Sub-project Components	Wastewater Treatment and water reuse	Physical, chemical and/or biological wastewater treatment; Flocculation, settling, and sludge dewatering	X	X	X	X	X	X
	Waste Treatment	Anaerobic waste treatment with biogas/energy production Waste to energy (gasification) system	-	X	X	X	X	X
		Sludge dewatering	X	X	X	X	-	X
		Recycling	-	-	-	X	X	-
		Incineration of Hazardous waste	-	X	X	X	X	X
	SCP Measures	Solar Panels	-	-	-	X	X	-
		Sound Chemical management	X	X	X	-	X	X
		Cleaner production	X	X	X	X	-	X
	Air emissions control		-	-	-	X	X	X
	Hazardous Waste Management		-	X	X	X	-	X

Most sub-projects are not expected to any negative social impact. However new types of sub-projects in this AF, which include for example incineration of wastes, could possibly lead to social and health impacts if not adequately sited or designed.

Otherwise most of the impact will actually be positive as the work environment of the workers will improve (better occupational health) and the population downstream or upwind/downwind of the project will benefit from better environmental conditions and less exposure to health risks; the projects also contribute to job creation during the construction and operation phases and demand for services and equipment that create opportunities mostly to SMEs. Moreover, the establishment of a comprehensive monitoring compliance and enforcement (MCE) system will enable information to be publicly disclosed

according to an approach based on benchmarking of environmental performance.

4.6 Typical Impacts and Mitigation for LEPAP Projects

Sub-projects are expected to have some negative impacts related to environmental and social aspects, which is why mitigation measures are recommended to reduce these impacts. Some impacts are common among the sub-projects, including occupational risks related to accidents, or fires, to which emergency plans for prevention and control should be available and implemented.

Considering the small scale of the potential sub-projects, labour influx is not expected, however if it were to happen in some cases e.g. a large amount of workers are needed to speed up the construction process, it is recommended to follow these mitigation measures: rely on the local workforce, assess and manage the labour influx during the EIA/ESMP process of each sub-project, and incorporate social and environmental mitigation measures into the civil works contract.

Other general mitigation measures that can be applicable to most projects include:

- Preform regular preventive maintenance;
- Keep records of all accidents incidents, their causes and preventive action taken;
- Develop internal and external GRM;
- Keep GRM records, and action taken to resolve it;
- Perform regular monitoring;
- Avail PPEs to workers;
- Ensure that BAT is used.

Table 4-4 describes anticipated impacts from typical LEPAP projects as well as mitigation and monitoring measures that can be used as a guidance when developing the ESIA or ESMP studies for identified LEPAP projects.
includes generic environmental monitoring requirements that can be used for guidance when developing sub-projects environmental monitoring plans.

Table 4-4 Identification of Possible impacts and Generic Mitigation Measures for Potential Sub-projects

Sub-project Components	Potential Impacts	Mitigation Measures	Responsibility
Wastewater Treatment and Water Reuse			
Physical, chemical and/or biological wastewater treatment; Flocculation, settling, and sludge dewatering	• Improved quality of discharged effluents • Potential leakage of wastewater and soil and water pollution from temporary failure of the treatment plant • Generation of industrial and non-industrial sludge which if improperly disposed of, could lead to soil and water pollution • Increase in ambient noise levels at nearby locations • Emissions of odours Transportation, use, disposal or accidental spill of hazardous materials during the operation and maintenance could result in potential harmful exposure to hazardous materials • Accidents that might affect occupational health and safety	• Ensure that the effluent quality is compliant with standards corresponding to the final disposal route by conducting regular monitoring • Conduct regular inspection and maintenance • Seek disposal of industrial sludge in local cement kilns and adopt technologies, as far as possible, that minimise sludge generation • Ensure that final sludge disposal method to be approved by MoE (separate ESIA study for sludge disposal method may be required unless covered in main ESIA study) • Ensure that Odour Control Units are available at the treatment facility, and that the used technology is sufficient to minimize the odours to levels compliant with applicable standards • Include a training plan for operators as part of loan agreement to ensure adequate capacity is available to operate the plant; a 6-month or 1-year operation contract with supplier may be envisaged • Develop a spill prevention and management plan on a specific project-by-project basis to minimise water and soil quality degradation associated with accidental spills • Train personnel and employees on occupational safety procedures and ESMP implementation • Develop an emergency plan (including firefighting prevention and control) • Prepare a GRM	Sub-Project Proponent Facility
Domestic and industrial Waste Treatment			
Anaerobic waste treatment with biogas/energy production; Waste to energy (gasification); projects aiming at using waste as an alternative source of fuel	• Positive impact by providing a management option for otherwise problematic wastes to be disposed of • Offset of power costs • Emissions of criteria air pollutants at levels that could substantially contribute to a potential violation of applicable air quality standards • Emissions of GHGs	• Ensure that drainage from feedstock loading, unloading and storage areas is contained onsite • Train employees involved in feedstock handling so as to discourage, avoid and minimise the release of feedstock or trash during operations • Develop a spill prevention and management plan on a specific project-by-project basis to minimise water and soil quality degradation associated with accidental spills	Sub-Project Proponent

Sub-project Components	Potential Impacts	Mitigation Measures	Responsibility
	• Emissions of odours • Increase in ambient noise levels at nearby locations • Generation of by-products (such as ash or sludge) which would require further disposal • Increase in the risk of fire hazards due to the potential release of biogas (in the case of anaerobic systems) • Transportation, use, disposal or accidental spill of hazardous materials during the operation and maintenance could result in potential harmful exposure to hazardous materials	• Prepare an Odour Management Plan (OMP) that incorporates equivalent odour reduction controls for digester operations on a specific project-by-project basis • Prepare a fire management plan on a specific project-by-project basis • Ensure that EIA study considers management and disposal of by-products, if any, and these are approved by MoE • Train personnel and employees on occupational safety procedures and EMP implementation • Include a training plan for operators as part of loan agreement to ensure adequate capacity is available to operate the plant; a 6-month or 1-year operation contract with supplier may be envisaged	
Sludge dewatering	• Generation of sludge which if improperly disposed of, could lead to soil and water pollution • Deterioration of surface and groundwater resources quality if the water from the process of sludge dewatering is not properly disposed of • Emissions of odours • Transportation, use, disposal or accidental spill of hazardous materials during the operation and maintenance could result in potential harmful exposure to hazardous materials	• Seek disposal of industrial sludge in local cement kilns and adopt technologies, as far as possible, that minimise sludge generation • Ensure final sludge disposal method to be approved by MoE (separate ESIA study for sludge disposal method may be required unless covered in main ESIA study) • Ensure that the effluent quality is compliant with standards corresponding to the final disposal route • Prepare an Odour Management Plan (OMP) that incorporates equivalent odour reduction controls for digester operations on a specific project-by-project basis • Train personnel and employees on occupational safety procedures and EMP implementation	Sub-project Proponent
Recycling	• Emissions of noise • Generation of waste residues and increased load on infrastructure • Emission of odours	• Conduct noise monitoring on a specific project-by-project basis to ensure that noise levels are compliant with national standards • Conduct regular inspection and maintenance • Ensure that the waste residues disposal route is approved by the MoE • Train personnel and employees on occupational safety procedures and EMP implementation • Avail PPEs for workers to limit their exposure to odours • Prepare an odour management plan to minimize odours to levels compliant with applicable standards	Sub-project Proponent

Sub-project Components	Potential Impacts	Mitigation Measures	Responsibility
Solid waste management establishments	• Potential water and soil pollution if not implemented properly • Emissions of odours • Increased traffic from waste transportation to and from the establishment	• Ensure that BAT is implemented • Avail PPEs for workers to limit their exposure to odours • Prepare an odour management plan to minimize odours to levels compliant with applicable standards Create a schedule for trucks to avoid peak traffic hours	Sub-project Proponent
Air Quality			
Air emissions control	• Potential exceedance of national standards due to temporary system failure • Potential disturbance from chronic exposure of sensitive receptors to certain air contaminants	• Ensure that the BAT techniques are used to reduce and control emissions • Conduct regular inspection and maintenance • Train personnel and employees on occupational safety procedures and EMP implementation	Sub-project Proponent
Medical Waste Treatment			
Incinerator	• Positive impact by providing a management option for hazardous waste, and reduction in the size of waste sent to landfills • Emission of toxic air pollutants • Emission of noises • Emission of odours • Generation of Toxic Ashes if improperly disposed of, could lead to soil and water pollution • Impacts on Occupational Health and safety from exposure to hazardous waste or toxic ashes	• Install filter on a specific project by project basis depending on the quantity and quality of incinerated waste • Online monitoring system when applicable • Conduct regular inspection and maintenance • Conduct noise monitoring on a specific project-by-project basis to ensure that noise levels are compliant with national standards • Prepare an Odour Management Plan (OMP) that incorporates equivalent odour reduction controls for digester operations on a specific project-by-project basis • Ensure that GRM in available • Ensure that generated toxic ashes are handled in a safe manner, and are sent to certified facilities • Train personnel and employees on occupational health and safety procedures, and the proper handling and storage procedures	Sub-project Proponent
Autoclaving	• Positive impact by providing a management option for hazardous waste, and reduction in the size of waste sent to landfills • Emission of air pollution from the transport • Liquid discharges	• Follow BAT to minimize impacts from autoclaving • Conduct regular inspection and maintenance • Ensure that GRM in available • Train personnel and employees on occupational health and safety procedures, and the proper handling and storage procedures	Sub-project Proponent

Sub-project Components	Potential Impacts	Mitigation Measures	Responsibility
	• Impacts on Occupational Health and safety from exposure to hazardous waste or toxic ashes		
Hazardous Chemicals management			
Spill control and prevention system	• Potential water and soil pollution if not implemented properly • Potential Occupational health and safety threats from chronic exposure of sensitive receptors to hazardous chemicals if not implemented properly	• Ensure that BAT is used • Conduct regular inspection and maintenance • Train personnel and employees on occupational safety procedures and EMP implementation	Sub-project Proponent
Agricultural pollution management			
	• Impact from organic waste from crop production • Impact from animal waste • Potential soil and water pollution from pesticides and fertilizers • Air emissions from vehicles and equipment such as tractors	• Ensure that waste from crops and animal waste and being reused or composted whenever possible • Ensure that measured and sufficient amounts of pesticides and fertilisers are used, so that the excess would not penetrate to the soil and ground water • Ensure that all equipment vehicles are being repaired and maintained on regular basis	Sub-project Proponent

Table 4-5 Generic Monitoring Measures for Potential Sub-projects

Monitoring Parameter	*Frequency*
Monitoring at Effluent Outfall	Frequency dependent on characteristics of effluent and treatment prior to discharge, as well as dilution, dispersion, sensitivity and downstream use of receiving environment (i.e., water or land).
pH	
Biological Oxygen Demand (BOD)	
Chemical Oxygen Demand (COD)	
Oil and grease	
Total Suspended Solids (TSS),	
Heavy metals (total and specific)	Refer to Table B 8 in the Annex
Ammonia	
Coliform	
Cyanide, free	
Cyanide, total	
Nitrate	
Fluoride	
Chlorine, total residual	
Phenols	
Phosphorous	
Sulfide	
Temperature, at edge of initial mixing zone	
Effluent flow, l/second	
Downstream Monitoring of Receiving Waters (additional parameters for measurement)	
Dissolved Oxygen (DO_2), mg/l	

General monitoring plan for sludge use

Frequency of monitoring	
The monitoring of sewage sludge for pathogen reduction or vector attraction reduction should be based on the amount of sewage sludge applied to the land by a generator or preparer.	
Amount of Sewage sludge (Dry Tons)	**Frequency depends on the quality and quantity of sludge**
Greater than zero but less than 319	Once per year
Equal to or greater than 319 but less than 1,650	Once per quarter (4 times per year)
Equal to or greater than 1,650 but less than 16,500	Once per 60 days (6 times per year)
Equal to or greater than 16,500	Once per month (12 times per year)

Source: Guidelines for Agricultural and Reclamation Utilization of Sewage Sludge under the Waste Regulations of the Department of Environmental Protection Commonwealth of Pennsylvania, http://www.dep.state.pa.us/dep/biosolids/362-2192-003.pdf

General monitoring plan for air pollution control (refer to ambient air quality standards in Annex Tables B4 and B5)

Item	Monitoring Parameters:	Sampling Frequency:	Monitoring Locations:
Baseline			
A baseline monitoring program may be required if existing data is insufficient for decision making; such a program may be more rigorous than the construction and operation monitoring programs.			
Construction Phase			
Air Quality	Particulate matter	Every 2 to 4 weeks	4 locations minimum: at nearest residences and site boundary
Noise	Decibels (dB)	Weekly	6 locations minimum: at nearest residences
Vibration		Weekly	
Operations Phase			
Air Quality	PM 10r Sulfur dioxide Nitrogen dioxide Metals (in soils)	Continuous and/or 24 hour average Continuous and/or passive samples every 2/4 weeks Continuous and/or passive samples Every 2/4 weeks Survey every 1-5 years	1 km Upwind and downwind 2 continuous / 10 passive 2 continuous / 10 passive 10 -15 soil samples
Noise		Bi-annually to annually	6-10 sites at nearest residences around the plant

The general maximum allowable limit values for air pollutants from generators of capacity below 0.5 MW according to Annex 1 of Decision 8/1, Table 3 (Group IV) are presented in Table 4-6

Table 4-6 Maximum Allowable Limit Values for Generators < 0.5 MW

Pollutant	Maximum Allowable Value
SOx	500 mg/m^3
NOx	

The general maximum allowable limit values for air pollutants from boilers at existing facilities that burn oil with a thermal capacity between 1 MW and 50 MW, according to Annex 2-1 of Decision 8/1 are presented in Table 4-7.

Table 4-7 Maximum Allowable Limit Values for Boilers that Burn Oil with a Thermal Capacity between 1 MW and 50 MW

Indicator	New Facilities
Oxygen percentage adjustment	3%
Dust (mg/m^3)	150
Carbon Monoxide (CO) (mg/m^3)	250
Nitrogen oxides (mg/m^3) • Diesel (according to the European standards) • Other fuel	 • 300 • 500
Sulfur oxides • Diesel (according to the European standards) • Other fuel	 • - • 1,700

4.7 Monitoring and Follow-up

It is the PMU's responsibility to follow-up on the subproject specific ESMP implementation (in support to MoE's compliance team). The following levels of reporting are not currently implemented but will be required:

- The Proponent (enterprise) shall submit a bi-annual report on ESMP implementation to the PMU and the MOE compliance unit. Currently only specific types of establishments report regularly to MoE i.e. cement industries, hospitals, fertilisers manufacturing plants
- The PMU will submit to the World Bank as part of its semi-annual project report, a report on the implementation of respective ESMPs, and overall status of compliance with the ESMF including updates on the project's GRM

Enforcement is the responsibility of MoE. Monitoring of financed sub-projects is undertaken by PMU in coordination with MoE whenever needed, and they might request further evidence that environmental mitigation and monitoring measures are being followed. The monitoring report, found in Appendix F, is used as a tool for monitoring and enforcement.

- During construction phase: the PMU is responsible for conducting monthly visits to ensure that the mitigation measures are being implemented.
- The PMU is also responsible for monitoring the implementation of the project during the operation phase, by conducting visits every 4 months. In the event of non-compliance observed during the monitoring visit is communicated to the concerned establishment, needed mitigation measures are agreed upon with a specific timeline. In cases of major non-compliance fines may prevail as per the national legislation.

The follow-up and monitoring of the LEPAP project progress is the responsibility of the PMU, and being done through follow-up on indicators, supervision missions, and regular meetings with the concerned stakeholders. The PMU will improve the process through:

- Submitting sub-projects monitoring reports to the World Bank task team
- Making efforts to raise awareness of the availability of the LEPAP GRM through its communication strategy, and the World Bank task team will follow up on this to ensure its implementation.
- Hire additional staff to monitor environmental and Social impacts, and for financial management and specific technical matters as needed

4.8 Capacity Building and Trainings

Several capacity building activities for the MoE members took place under the LEPAP parent project to improve their capacities, especially the PMU members who were trained on several topics including: Sustainable management of industrial areas, wastewater treatment of pulp and paper industries, reduction of the environmental impact of the Lebanese paint industries, wastewater monitoring, OHS, GRM and wastewater management in the food sector.

In addition, a workshop for Commercial Banks was held by BDL and the MoE on October 10, 2018 with the assistance of the World Bank. The participants were leading Commercial Banks in Lebanon that are already participating to the LEPAP project (such as Fransabank, Bank Audi, BLF) as well as that potential sub-project participants in the future. The focus was also on environmental and social risks (including the requirements under LEPAP) and taking advantage of green financing opportunities.

Based on the outcomes of these Capacity building and training activities, the needs have been identified to ensure that all elements and recommendations of this ESMF can be implemented.

More focus on the Occupational health and safety in the capacity building workshops is planned so in addition to regular monitoring by the PMU, an OHS awareness raising workshop for all interested industries shall be conducted.

Additionally, the trainings for the MoE members showed the importance of such trainings therefore they shall continue in order to ensure the PMU environmental experts are qualified to supervise implementation of the ESMF. A job description for an EMS officer is recommended in Appendix G.

It is proposed that main capacity building and training activities to be directed to commercial banks to enhance their capabilities to manage E&S risks and take over responsibilities from the PMU in screening sub-projects, conducting due diligence and monitoring implementation of ESMPs.

4.9 Budget

The budget for implementation of the LEPAP-AF is divided into the two main components:

Technical Assistance: it is estimated that USD$ 5 million will be allocated for the technical assistance including the PMU operating costs such as communications and purchase of equipment, capacity building in the project management that may be deemed necessary.

Investment in pollution management: An estimated amount of USD$ 45 million will be allocated to the concessional loans.

5. Stakeholders Meeting

A stakeholders meeting was organized at Ramada Hotel on Thursday November 21, 2019 to present the Environmental and Social Management Framework (ESMF) of the Lebanon Environmental Pollution Abatement Project-Additional Financing (LEPAP-AF). A total of 47 participants, including 14 women, attended the meeting and included representatives from the Ministry of Environment, Ministry of Industry, Ministry of Energy and Water, Banque du Liban, several commercial banks (including: Bank Audi and Bankmed), World Bank, Association of Lebanese Industries, Lebanon Red Cross, and several establishment or industries that are borrowers or potential borrowers from LEPAP as shown in Table 5-1. The list of attendees can be found in Appendix K.

Table 5-1 Institutions represented in the LEPAP Stakeholders meeting

Category	Name of Institution
Public Sector	Ministry of Environment Ministry of Industry Ministry of Energy and Water Economic and Social Fund for Development (ESFD)
Banking/ Financial Sector	Banque du Liban Bank Audi Bankmed
Private Sector / Academia	American University of Beirut Association of Lebanese Industries Librasil Lebanon Chemicals Company Chateau Ksara LAU Medical Center- Rizk Hospital Holcim Oxylus ventures Benta sal Phoenix Energy Gandour Solution Daher Foods Cimenterie Nationale MAN Enterprise Gemayel Freres SAL Ciment de Sibline
NGOs	Lebanese red cross
International Organisations	UNDP World Bank

The minister of environment, HE. Mr. Fadi Jreissati, opened the meeting and explained the importance of LEPAP to financially support the private sector in complying with environmental standards and enhancing their environmental performance. Mr. Bassam Sabbagh, LEPAP focal point at MoE, highlighted that the LEPAP-AF considers additional sectors and establishments, such as healthcare facilities, as eligible for financing which is an improvement from the initial parent project. Mr. Ricardo Khoury from ELARD then presented the ESMF, including LEPAP-AF eligibility criteria and Environmental and Social impact assessment requirements and procedures. Following the presentation, several questions were made by the attendees as shown in Table 5-2.

Table 5-2 Questions and concerns raised during the stakeholders meeting

Organization	Question/ Concern	Response
Bank Audi	Needed clarification on whether	The PMU will continue to provide

Organization	Question/ Concern	Response
	TA will continue to technically and financially support the development of the E&S safeguard studies	the TA free of charge to the beneficiaries
	Highlighted that Bank Audi typically includes in their the sub-loan agreement the E&S requirements from the ESIA or ESMPs	This is in line with best practice
	Requirement of public consultations for every ESIA or ESMP could hinder the implementation of projects due to delays and opposition; it is important to clarify also who should be invited to such meetings	• The consultation process should be focused and target potentially affected population and relevant stakeholders; for ESIAs, procedures to announce public consultation sessions and invite stakeholders are described in Decree 8633/2012 and Decision 261/2015; for ESMPs, these procedures do not need to be followed as long as consultations are conducted in a meaningful and inclusive manner. • Involving the public in a transparent manner should not be seen as a hindrance but rather a way to enhance trust and gain community support hence supporting project implementation
Chateau Ksara	When labor standards differ between national legislations and WB, which one should be followed?	WB standards should be followed when they are stricter than national requirements.
Ministry of Industry	What is the relationship between LEPAP and SwitchMed that also finances Sustainable Consumption and Production initiatives and is there coordination? Why are solid waste solid waste facilities considered separately since they are also classified as industrial facilities? Will LCEC continue to be involved in review of applications on behalf of central bank?	LEPAP and SwitchMed did coordinate in the past and industries which benefitted from their support are eligible for financing under LEPAP. It should be noted that SwitchMed was a pilot project. Not all Solid Waste facilities are considered industrial (ie transformational industries which is the case of composting plants); for instance sorting plants or landfills are not classified as industrial. Role of LCEC will also be reviewed

Organization	Question/ Concern	Response
		as part of the new Loan agreement.
-	What is the maximum amount for funding?	There are no limits on maximum amounts of funds, but projects above 5 m USD require clearance from the World Bank
Association of Lebanese Industries	Some industries are interested in the TA and free consultation without the funding.	LEPAP cannot give TA and free consultation to all establishments but it did help out many who submitted requests.
	If an establishment has a loan from a bank, can it benefit from LEPAP and renegotiate the loan with the commercial bank to reduce the interest rate?	No, if the loan has already been paid by the establishment it is not possible.
	Chemical industries need to have a chemist or a specialized consultant.	• It would be a good idea to make this as a requirement, but this falls within MoI mandate
	LEPAP is addressed to large industries given that small sub-projects are not eligible for financing under the mentioned project	• Several environmental guidelines have been prepared by LEPAP and new ones are being prepared for various sectors to provide guidance on main impacts and applicable mitigation measures. • Several sub-projects submitted to LEPAP and considered as not eligible for financing under LEPAP due to their small amounts have been financed by BDL under the parallel financing credit line
Lebanon Chemicals Company	If an establishment obtained financial support during Phase I is it eligible for LEPAP-AF?	Yes
Chateau Ksara	We have been approved for LEPAP funding and applied to BdL since 3 months, but additional information is being requested. Is this related to the current situation in Lebanon?	• Bdl has certain procedures that they have to follow. • LEPAP is trying to set deadlines to ensure that payments are done within a reasonable time
Cimenterie Nationale	What is the interest rate for the LEPAP-AF loans and when are the loans going to be available?	• This will be determined following loan negotiations, but it is most likely going to be similar

Organization	Question/ Concern	Response
		to the parent project which was close to zero percent. • The loan still needs to be approved by parliament following World Bank's approval




Figure 4. Stakeholders meeting

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Appendices

Appendix A 2014-2019 financed sub-projects by the WB

Industry	Sector/ Sub-sector	Main Impact	Intervention Financed under LEPAP	Type of Intervention	Main Impact of Intervention	Technical Assistance Provided						Monitoring Activities
						EIA	CAP	EA	ESMP	Procurement	Technical Evaluation	
Sicomo Qab Elia	Recycled cardboard manufacturing	Installed a Waste-to-Energy (WtE) for treatment and recovery of energy from solid waste that remains from collection and segregation of previously sorted municipal solid waste	Installation of a dust collector and a continuous monitoring system for emissions from WtE	End-of-pipe treatment	Particulate matter reduction of more than 99% and total reduction of about 65 tonnes/yr	x	x				x	Review of monitoring reports submitted to MoE
Wilco PM Chekka	Food/poultry slaughterhouse and poultry meat production	Solid waste and blood generated by the poultry slaughterhouse and processing plant operations (live birds holding and receiving, slaughtering, de-feathering, eviscerating, carcass washing, chilling, cut-up and cleanup)	Installation of a rendering plant to treat solid waste resulting from slaughtering and meat processing activities (poultry processing waste, blood and dead birds); Upgrade of WWTP	Resource recovery/End-of-pipe treatment	Reduction of amount of waste deposited in landfills and/or discharged into municipal wastewater treatment facilities; and reduction of the risk of groundwater pollution and public health problems. The plant is designed to	x					x	Monitoring of construction and installation works since June 2019

Industry	Sector/ Sub-sector	Main Impact	Intervention Financed under LEPAP	Type of Intervention	Main Impact of Intervention	Technical Assistance Provided						Monitoring Activities
						EIA	CAP	EA	ESMP	Procurement	Technical Evaluation	
					treat 23 t/day but will receive 12 t/d of waste during the first phase of its operation							
Cimenterie Nationale SAL Chekka	Cement production	Dust emissions resulting from kiln 4	Replacement of the existing Electrostatic Precipitator (ESP) of kiln 4 with a high efficiency bag filter	End-of-pipe treatment	Reduction in dust emissions from kiln 4 from 12.9 mg/m³ to below 2 mg/m³ Elimination of the risk of ESP explosion as a result of sparks reaching potential incomplete combustion gases Easier maintenance of bag filter Decreased flue gas cooling requirements		x				x	Review of regular air emissions monitoring reports submitted to MoE
		Dust emissions resulting from kilns 2 and 3	Replacement of the existing Electrostatic		Reduction in dust emissions from kils 2 and		x				x	

Industry	Sector/ Sub-sector	Main Impact	Intervention Financed under LEPAP	Type of Intervention	Main Impact of Intervention	Technical Assistance Provided						Monitoring Activities
						EIA	CAP	EA	ESMP	Procurement	Technical Evaluation	
			Precipitator (ESP) of kilns 2 and 3 with a high efficiency bag filter		3 from 12 mg/m³ to below 2 mg/m³ Reduction of 92 tons/yr in dust load Elimination of the risk of ESP explosion as a result of sparks reaching potential incomplete combustion gases Easier maintenance of bag filter Decreased flue gas cooling requirements							
Zinaline SARL Mastita	Wood and furniture manufacturing	Large quantities of waste and particulates from wood cutting disposed of without treatment as domestic waste but which can be re-	Briquetting machine, beam saw	Resources recovery and efficiency/Waste minimization	Up to 50% reduction in dust emissions of around 9 t/yr and recovery of usable material End-of-pipe						x	–

Industry	Sector/ Sub-sector	Main Impact	Intervention Financed under LEPAP	Type of Intervention	Main Impact of Intervention	Technical Assistance Provided						Monitoring Activities
						EIA	CAP	EA	ESMP	Procurement	Technical Evaluation	
		covered, converted and reused. These materials affect the health of workers inside the plant and disturb adjacent buildings in the area			treatment having a direct positive impact on air quality in the area, inside the plant and around it							
		Wood dust emissions, VOCs and odors generated by production process activities causing deteriorated indoor air quality	Dust exctraction system	End-of-pipe treatment and resource recovery								
Kassatly Beirut SARL Makse	Food/ manufacturing of beer, wine and other bev-	Domestic and industrial wastewater generated from the production	Implementation of wastewater treatment plant for the treatment of	End-of-pipe treatment	Reduction of surface water and soil pollution through the reduction of biological			x	x	x	x	Monitoring of construction works since January 2019 and of

Industry	Sector/ Sub-sector	Main Impact	Intervention Financed under LEPAP	Type of Intervention	Main Impact of Intervention	Technical Assistance Provided						Monitoring Activities
						EIA	CAP	EA	ESMP	Procurement	Technical Evaluation	
	erages (carbonated drinks, liqueurs, juices, etc.)	activities discharged into nearby water stream without treatment	domestic and industrial wastewater		pollutants, suspended solids and oil and grease in the wastewater discharged. Plant is currently receiving 160 m3/day but was initially designed to treat up to 220 m3/day. Reduction of COD levels from 1,360 mg/l to below 125 mg/l.							operation since June 2019
Ciment de Sibline SAL Sibline	Cement production	Fugitive dust emissions resulting from the conveyor belts of Lines 1 and 2 and from the petcoke and coal storage area	Installation of a cover for the petcoke and coal storage area	Resource recovery	Up to 90% reduction of PM emissions from petcoke and coal operation through complete closure of the storage area						x	Monitoring of construction works since June 2019
			Conversion of the conveyor belts to pan		Up to 90% reduction of PM emissions from							

Industry	Sector/ Sub-sector	Main Impact	Intervention Financed under LEPAP	Type of Intervention	Main Impact of Intervention	Technical Assistance Provided						Monitoring Activities
						EIA	CAP	EA	ESMP	Procurement	Technical Evaluation	
			and bucket conveyors for Line 1 and Line 3		the conversion of conveyor belts of Line 1 and Line 2 into pan and bucket conveyors, repectively							
Libanlait SAL Hoshsneid	Food/dairy production (milk, yogurt, cheeses) and juices	Wastewater generated from the farm and dairy production activities present high loads of pollutants and is discharged into nearby stream without treatment. Wastewater generated from the farm has high levels of BOD, COD, TSS, total N and oil and grease while wastewater generated from	Implementation of a nutrient recovery and water recycling plant for the treatment of wastewater generated at the farm and dairy plant. This will allow recovery of solids for composting, production of a liquid fertlizer and generation of clean water which can be reused onsite or discharged	Resource recovery/pollution prevention	Allow Libanlait to recover the majority of the produced liquids as clean water while the crop nutrients are segragated and concentrated Contribute to the improvement of the water and agriculture quality in the region since the treated effluent is discharged into the nearby stream which ends up being			x	x	x	x	Monitoring of construction works since April 2019

Industry	Sector/ Sub-sector	Main Impact	Intervention Financed under LEPAP	Type of Intervention	Main Impact of Intervention	Technical Assistance Provided						Monitoring Activities
						EIA	CAP	EA	ESMP	Procurement	Technical Evaluation	
		the dairy production activities has high levels of BOD, COD and oil and grease.			used by local farmers for irrigation							
Sicomo, Qab Elia	Recycled cardboard manufacturing	Wastewater generated from the pulping and recycling processes contains high concentrations of BOD and COD. Wastewater goes through a pre-treatment unit. Part of the pre-treated wastewater is currently reused in the process while excess water is discharged into	Upgrade of wastewater treatment system for the treatment of domestic and industrial wastewater	End-of-pipe treatment	Allow Sicomo to reuse the majority of the treated effluent and to reduce surface water and soil pollution through the reduction of pollution loads in the discharged wastwater. Plant is initially designed to treat up to 1,200 m3/day. Reduction of COD levels		x		x		x	Monitoring of construction works since May 2019

Industry	Sector/ Sub-sector	Main Impact	Intervention Financed under LEPAP	Type of Intervention	Main Impact of Intervention	Technical Assistance Provided						Monitoring Activities
						EIA	CAP	EA	ESMP	Procurement	Technical Evaluation	
		the nearby water stream.			from 1,430 mg/l to below 180 mg/l. Contribute to the improvement of the water and agriculture quality in the region since the treated effluent is discharged into the nearby stream which ends up being used by local farmers for irrigation							
Château Ksara SAL Ksara	Food/Winery and arak production facility	Generation of industrial wastewater from cleaning activities of equipment and production areas. The wastewater contains high concentrations	Amendment of drainage network and installation of wastewater treatment plant for the treatment of domestic and industrial wastewater	End-of-pipe treatment	Reduce the volume of wastewater generated and lower biological pollutants, suspended solids and nitrogen in the wastewater discharged.			x	x	x	x	Monitoring of construction works since September 2019

Industry	Sector/ Sub-sector	Main Impact	Intervention Financed under LEPAP	Type of Intervention	Main Impact of Intervention	Technical Assistance Provided						Monitoring Activities
						EIA	CAP	EA	ESMP	Procurement	Technical Evaluation	
		of organic compounds.			Plant is initially designed to treat up to 60 m3/day.Reduction of COD levels from 5,000 mg/l to below 500 mg/l Achieve compliance with the limit values for wastewater discharge into the sewer set by the Ministry of Environment							
		Rainwater and excess water resulting from the source existing onsite are being discharged into the same drainage system as the industrial wastewater. This results in increasing the volume of wastewater generated and would put more pressure on the public wastewater network										

Appendix B Summary of Relevant Legislation and Standards to LEPAP

Overview of the Legal Framework in Lebanon

The Lebanese Constitution represents the highest-order legislative text in Lebanon and when in contradiction with the Constitution, proposed legislation(s) cannot be issued. International treaties and agreements ratified by Lebanon have the second priority in the Lebanese legislative framework.

Table B.1. Categories of Legislation in Lebanon

Type of Legislation	Organisation and Description
Laws	Laws are passed by the Lebanese Parliament. The Council of Ministers or Member of Parliament can propose a project of law that should pass through the appropriate parliamentary committee. The committee reviews, assesses and presents the law, with the amendments it introduces, for final approval by the Parliament.
Decree Laws	The Parliament has empowered the Council of Ministers to issue decree-laws without the prior approval or supervision of the Parliament. Decree laws have the same legal standing and powers as laws.
Decrees	The Council of Ministers issues decrees that have the power of law provided they do not contravene existing laws. The Council of State should be consulted before the issuance of a decree.
Resolutions/ Decisions	Ministers issue resolutions or ministerial decisions without the pre-approval of the Council of Ministers. Resolutions have the power of law provided they do not breach existing laws. The Council of State should be consulted before the issuance of a resolution or ministerial decision.

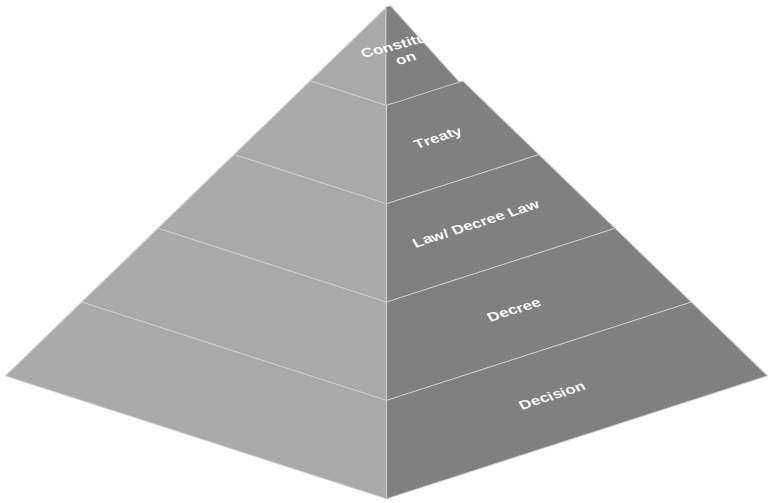

Figure B.1. Hierarchy of Legislation in Lebanon

Synopsis of the Legislative Framework for Environmental Protection

The environmental legal framework of Lebanon has steadily developed since the creation of the Ministry of Environment (MoE) in 1993. In 2002, the Lebanese Parliament issued Law No. 444, which is the framework law for protection of the environment of Lebanon. The MoE has since developed several draft decrees and laws to activate the implementation of the clauses of Law No. 444. Some of these decrees were recently approved by the Council of Ministers for implementation; including the Environmental Impact Assessment (EIA) Decree No. 8633/2012 and the Environmental Compliance Decree

No. 8471/2012. Mechanisms to activate other decrees which create incentives for investments in pollution abatement and promote enforcement of environmental legislation such as Decree No. 7841/2012 as well as the draft law establishing an environmental prosecutor (approved by the Council of Ministers in January 2012 and forwarded to the Parliament) and a draft decree to introduce an 'environmental police.

A summary listing of the main environmental legislation relevant to the LEPAP is presented in Table B.2.

Table B.2. Overview of the Lebanese Legislative Framework Relevant to the Project

Year	Law / Decree / Decision	Relevant Provisions
2019	MoE Memo 7-1	Wastewater treatment Plant for private establishments
2019	CoM Decision 3	Integrated Solid Waste Management Roadmap 2019-2030
2019	CoM Decree 5606/2019	Hazardous waste management
2018	Law 78	Air quality protection law
2018	Law 77	Water quality protection law
2018	Decision No. 80	Integrated Solid Waste Management
2017	Memo 9-1	Prohibits Wastewater discharge into wells
2017	MoF Decree No. 167/2017	Potential tax reduction on costumes for environmentally friendly activities
2017	Lay 28/2017	Government disclosure policy regarding public documents reinforces the disclosure of MoE's IEE and EIA.
2016	MoE Decision 189/1	EA review mechanism to comply with the decree No. 8471-2012 related to environment compliance to become mandatory by 2018, 2019 and 2020 for class I, class II and class III industrial establishments respectively as defined in the ministerial decision No. 539/1-2015
2016	CoM Decree No. 3989/16	Establishment of the Environmental Police composed of 40 Policemen
2016	Law 63/2016	Protection of Litani river, sets deadline for industries that are discharging its wastewater into the litani river to treat the wastewater
2015	MoE Decision 260/1 MoE Decision 261/1	Procedures for reviewing the Initial Environment Examination (IEE) and the Environment Impact Assessment (EIAs) reports
2015	MoJ Decision No. 3330 of 2015	Experts and Magistrate reserves in all provinces, which includes environmental experts names (Environmental Engineering and Environment)
2015	MoE Decree 590/1	Decision making mechanism for industrial institutions' permits from an environmental aspect.
2015	MoE Decision No. 539/1 MoE Decision No 540/1	Setup of deadlines for applying to obtain the Environmental Compliance Certificate for classified establishments Industrial and non-industrial
2014	Law No. 251/2014	Environmental prosecution: based on which 6 district Environment Attorneys and 7 investigation judges for environmental issues were appointed in 6 Lebanese governorates
2013	BdL Intermediate Circular No. 313(Decision No. 11329)	Sets financial incentives targeted at encouraging commercial banks and lending institutions to offer loans at low interest rates for private enterprises seeking to reduce their environmental footprint.
2013	MoE circular 1/1	Procedures for payment of fees related to EIA and IEE reports
2012	MoE Decisions 229 and 230	Procedures for review of IEE and EIA reports

Year	Law / Decree / Decision	Relevant Provisions
2012	Decree No. 8471 (Environmental Compliance)	Requires that every industrial enterprise obtains an environmental certificate within a time period to be determined by the MoE.
2012	Decree No. 8633 (Environmental Impact Assessment)	Defines the scope and stages of the national Environmental Impact Assessment process.
2012	MoI Decision No. 30/1	For the industries established and licensed before issuance of Decree No. 8018/2002, environmental restrictions can be introduced to their license terms when industries require a permit certificate or modification.
2012	MoI Decision No. 14/1	Provides general requirements for industrial permitting including adoption of water conservation measures in industrial processes.
2012	Decree No. 7841	Forwards to the Parliament a draft law that institutionalises the environmental prosecutor
2010	MoE Decisions No. 100/1/,101/1 and 102/1	Define environmental limit values for waste from the olive oil industry, as well as environmental guidelines for using treated OMW in irrigation.
2010	MoEW Decision No. 118	Development of procedures for licensing new wells and disclosing illegal wells.
2005	Decree No. 14597	Water provided by Lebanon's regional Water and Wastewater Establishment to industries is limited and competes with other uses of water including domestic (Article 30).
2002	Law No. 444	Framework Law for the Protection of the Environment.
2002	Decree No. 8018	Establishes procedures and guidelines for the establishment and operation of industrial institutions/facilities and distance requirements from water resources according to industry classification.
2001	Decree No. 5243	Amends Decree No. 4917/1994 where it defines a new classification system for industrial establishments that relies on several environmental criteria (e.g., impact on water, air and soil, environmental risk, odour, and noise) to set the degree of environmental threat.
2001	MoE Decision No. 8/1	Sets "Emission Standards for Air Pollutants And Wastewater Discharges from Classified Establishments and Wastewater Treatment Plants".
1999	Decree No. 1039	Establishes drinking water standards.
1997	Law No. 623	Implementation of penalties for vandalism of water, telephone and electricity infrastructure.
1996	MoE Decision No. 52/1	Specification of the National Standards for Environmental Quality (NSEQ) and the Environmental Limit Values (ELVs) for Air and Water.
1996	MoE Decision No. 40/1	Amendment of Decision No. 22/1/1995.
1995	MoE Decision No. 22/1	Enforcement of Environmental Standards for Industries.
1994	Decree No. 5509	Organisation and general rules for the storage of oil products, cisterns and fuel stations.
1994	Decree No. 4917	Classification of establishments in Lebanon; amended by Decree No. 5243/2001.
1990	Law No. 14	Protection of the Sea and the Coast.
1988	Law No. 64	Environmental protection against hazardous waste that could harm air, water, biodiversity, soil and humans.
1977	Decree No. 118	Municipal act, taking preventive measures against fires.
1972	MoPH Decision No. 67	Methodology for bacteriological analysis of water.
1968	Decree No. 11541	Organisation of the body responsible for monitoring the coast within the Internal Security Forces.
1966	Decree No. 4809	Regulation of the Lebanese Coastal Zone.

Year	Law / Decree / Decision	Relevant Provisions
1950	Law No. 63	Protection of the Marine Fauna and Flora.
1936	Decision No. 6/1 T	Stipulates general industrial health criteria and specifications for the storage of fuel.
1933	Decree No. 2761	Provides guidelines related to wastewater management and disposal.
1932	Decree Law No. 16 L	Based on Decision No. 320/1/1926, it mandates the establishment of buffer zones for the protection of all surface and groundwater resources from any type of activity/potential source of pollution. Requirements for buffering are found in Decision No. 320/1/1926.
1926	Decision No. 320/1	Addresses the conservation of public water and its use. It prohibits blocking the free flow of public water or the performance of some works such as drilling for underground or artesian water without obtaining the proper permit from the relevant administration.

National Environmental Standards

National emission and discharge standards were established by the MoE in Decision No. 52/1/1996 and in the MoE Decision No. 8/1/2001. The main legislative texts that specify environmental standards in Lebanon are listed in Table B.3.

Table B.3. Relevant National Environmental Standards

Legal Text No.	Date	Contents
Ministerial Decision No. 52/1, MoE	29/07/1996	Environmental Quality Standards & Criteria for Air, Noise, Water and Soil
Ministerial Decision No. 8/1, MoE	30/01/2001	National Standards for Environmental Quality (NSEQ) related to air contaminants and liquid waste emitted from classified establishments into receiving water bodies.

Air Quality

Ambient Air Contaminants

The maximum allowable concentrations of ambient air contaminants (MoE Decision No. 52/1/1996) are presented in the following table.

Table B.4. Maximum Allowable Concentrationsof Ambient Air Contaminants (MoE Decision No. 52/1/1996)

Pollutant	Maximum Allowable Concentration (in µg/m^3)	Averaging Period
Sulphur Dioxide (SO_2)	350	1 hour
	120	24 hours
	80	1 year
Nitrogen Dioxide (NO_2)	200	1 hour
	150	24 hours
	100	1 year
Ozone (O_3)	150	1 hour
	100	8 hours

Pollutant	Maximum Allowable Concentration (in µg/m^3)	Averaging Period
Carbon Monoxide (CO)	30,000	1 hour
	10,000	8 hours
Total Suspended Particulate (TSP)	120	24 hours
Particulate Matter (PM_{10})	80	24 hours
Lead	1	1 year
Benzene	5 ppb	1 year

Discharge and Emission Standards

The emission limit values are specified in Decision No. 8/1/2001. These emission limit values are valid for all industrial plants as long as no specific regulations for single branches are given.

Emission standards are given as mass flows and as concentrations. For mass flows lower than those providedin column 3 of Table B.5, no concentration emission limit value exists. If the mass flows appearing in column 3 are exceeded, the concentration emission limit values of column 2 apply.

Table B.5. Maximum Emission Limits of Air Contaminants (MoE Decision No. 8/1/2001)

Parameter[1]	Emission Limit Value	Remark
Dust	200 mg/m^3 (for new facilities) 500 mg/m^3 (for existing facilities)	None containing hazardous compounds
Particulate Inorganic Pollutants		
Group I	1 mg/m^3	Mass flow > 5g/h
Group II	10 mg/m^3	Mass flow > 25g/h
Group III	30 mg/m^3	Mass flow > 50g/h
Gaseous Inorganic Pollutants		
Group I	1mg/m^3	Mass flow > 50g/h
Group II	5mg/m^3	Mass flow > 300g/h
Group III	30mg/m^3	Mass flow > 1,000g/h
Group IV	500mg/m^3	Mass flow > 10,000g/h
Gaseous Organic Pollutants		
Group I	20mg/m^3	Mass flow > 500g/h
Group II	100mg/m^3	Mass flow > 4,000g/h
Group III	200mg/m^3	Mass flow > 6,000g/h
Cancer Causing Pollutants		
Group I	0.2mg/m^3	Mass flow > 5g/h
Group II	2mg/m^3	Mass flow > 10g/h
Group III	10mg/m^3	Mass flow > 50g/h

Notes:
1: The types of inorganic and organic pollutants within the groups are listed in detail in MoE Decision No. 8/1/2001.

Minimum Stack Height Approach for Generators (MoE Decision No. 8/1/2001)

As perMoE Decision 8/1/2001, ELVs or a minimum stack height apply for the case of release of exhaust gases. This method can be used instead of applying the ELVs for generators. This means that an operator of a plant can choose whether s/he meets the ELVs on one hand or installs a capacity correlated stack height on the other hand to fulfil the demands on the necessary dilution of the emissions. The formula for the determination of the stack height is:

$H = h + 0.2\sqrt{kVA}$

Where:

H = Total stack height in metres

h = Height of neighbouring building in metres

kVA = Total generator capacity of the set in kVA = kW, i.e. the total capacity which is determined by the maximum fuel (energy) input

The minimum stack height is related to the following conditions:

- Area of applicability: > 500 total generator capacity [kVA = kW];
- Minimum height: 1 m + height of neighbouring buildings in [m] (inside 50m diameter from the stack or the average building height in the neighbourhood);
- Minimum exhaust gas velocity: 15 m/s;
- More than one generator: total capacity; and
- < 500 total generator capacity [kVA=kW]: 1 m + height of installation hall.

Noise

The national maximum allowable noise level and the permissible noise exposure standards as perMoE Decision No. 52/1/1996 are presented in the following tables. As per MoE Decision No. 52/1/1996, the maximum instantaneous noise level (Lmax) should not exceed 134 dB(A).

Table B.6. Permissible Ambient Noise Levels in Selected Regions

Region Type	Limit for Noise Level dB(A)		
	Day Time (07:00-18:00)	Evening Time (18:00-22:00)	Night Time (22:00-07:00)
Residential areas with some construction sites or commercial activities or located near a road	50-60	45-55	40-50
Urban residential areas	45-55	40-50	35-45
Industrial areas	60-70	55-65	50-60
Rural residential areas, hospitals and gardens	35-45	30-40	25-35

Table B.7. National Occupational Noise Exposure Standards in Work Areas

Duration per Day (hrs)	Sound Level dB(A)
8	90
4	95
2	100
1	105
½	110

Duration per Day (hrs)	Sound Level dB(A)
¼	115

Water Quality

Standards for wastewater discharge into receiving water bodies (also referred to as ELVs) are set out in MoE Decision No. 8/1/2001 and are shown below. The Decision also refers to the required studies for the design of sea outfalls. The outlet of the pipeline for coastal outfalls, its length and depth should be designed according to:

- Sea bed data:
  - Sea bed levels;
  - Sea bed soils; and
  - Sea bed stability or movements.
- Environmental data:
  - Wind speed frequencies and direction;
  - Local topography and effects on currents, winds and waves; and
  - Shipping, dredging, fishing, shell fishery, bathing and other activities.
- Effluent data; and
- Receiving water characteristics:
  - Time for bacteria to die;
  - Horizontal and lateral dispersion coefficients;
  - Vertical dispersion coefficient; and
  - Temperature, salinity and density profiles.

Table B.8. Maximum Limits (ELVs) for Wastewater Discharge into the Receiving Water Bodies and Public Sewers (MoE Decision No. 8/1/2001)

Parameter	Maximum Allowable Limits for Receiving Water Bodies		
	Public Sewers	Surface Water (Inland)	Sea
Colour	none	none	none
pH	6-9	6-9	6-9
Temperature	35°C	30°C	35°C
BOD (5 day, 20°C)	125 mg/L	25 mg/L	25 mg/L
COD (dichromate method)	500 mg/L	125 mg/L	125 mg/L
Total Phosphorus	10 mg/L	10 mg/L	10 mg/L
Total Nitrogen[1]	60 mg/L	30 mg/L	30 mg/L
Suspended solids	600 mg/L	60 mg/L	60 mg/L
AOX	5	5	5

Parameter	Maximum Allowable Limits for Receiving Water Bodies		
	Public Sewers	Surface Water (Inland)	Sea
Detergents	-	3 mg/L	3 mg/L
Coliform Bacteria 370 C in 100 mL[2]	-	2,000	2,000
Salmonellae	Absence	Absence	Absence
Hydrocarbons	20 mg/L	20 mg/L	20 mg/L
Phenol Index	5 mg/L	0.3 mg/L	0.3 mg/L
Oil and grease	50 mg/L	30 mg/L	30 mg/L
Total Organic Carbon (TOC)	750 mg/L	75 mg/L	75 mg/L
Ammonia (NH_4^+)	-	10 mg/L	10 mg/L
Silver (Ag)	0.1 mg/L	0.1mg/L	0.1 mg/L
Aluminium (Al)	10 mg/L	10 mg/L	10 mg/L
Arsenic (As)	0.1 mg/L	0.1 mg/L	0.1 mg/L
Barium (Ba)	2 mg/L	2 mg/L	2 mg/L
Cadmium (Cd)	0.2 mg/L	0.2 mg/L	0.2 mg/L
Cobalt (Co)	1 mg/L	0.5 mg/L	0.5 mg/L
Chromium total (Cr)	2 mg/L	2 mg/L	2 mg/L
Hexavalent Chromium (Cr VI^+)	0.2 mg/L	0.2 mg/L	0.2 mg/L
Copper total (Cu)	1 mg/L	0.5 mg/L	1.5 mg/L
Iron total (Fe)	5 mg/L	5 mg/L	5 mg/L
Mercury total (Hg)	0.05 mg/L	0.05 mg/L	0.05 mg/L
Manganese (Mn)	1 mg/L	1 mg/L	1 mg/L
Nickel total (Ni)	2 mg/L	0.5 mg/L	0.5 mg/L
Lead total (Pb)	1 mg/L	0.5 mg/L	0.5 mg/L
Antimony (Sb)	0.3mg/L	0.3mg/L	0.3mg/L
Tin total (Sn)	2 mg/L	2 mg/L	2 mg/L
Zinc total (Zn)	10 mg/L	5 mg/L	5 mg/L
Active Cl_2	-	1 mg/L	1 mg/L
Cyanides (CN^-)	1 mg/L	0.1mg/L	0.1mg/L
Fluorides (F)	15 mg/L	25 mg/L	25 mg/L
Nitrate (NO_3^-)	-	90 mg/L	90 mg/L
Phosphate (PO_4^{3-})	-	5 mg/L	5 mg/L
Sulphate (SO_4^{2-})	1,000 mg/L	1,000 mg/L	1,000 mg/L
Sulphide (S^{2-})	1 mg/L	1 mg/L	1 mg/L

- **Notes:**

1: Sum of Kjeldahl-N (organic N + NH_3),NO_3-N, NO_2-N

- 2: For discharges in close proximity to bathing water, a stricter environmental limit value could be necessary

Standards and quality requirements for aquatic life and bathing water in sea water, rivers and lakes in Lebanon were established inMoE Decision No. 52/1/1996. Defined guide values and maximum admissible limit values are shown in below.

Table B.9. Guide Values and Maximum Admissible Limit Values for Aquatic Life

Parameter	Guide Value	Maximum Admissible Limit
Temperature	-	Temperature downstream of discharge point (at the edge of the mixing zone) should not exceed the natural temperature by more than 1.5°C)
	-	The temperature of the effluent at the edge of the mixing zone shall not exceed 21.5°C or go below 10°C
DO (mg/L O_2)	50%>9 100%>7	50%>9
pH	-	6-9
Suspended Solids (mg/L)	<25	-
BOD_5 (mg/L O_2)	<3	-
Total Phosphorous (mg/L PO_4)	-	0.2
Nitrites (mg/L NO_2)	<0.01	<0.01
Phenolic Compounds	Should not change taste of fish	
Petroleum hydrocarbons	Petroleum products should not be present in water in such quantities to: - Form a visible layer on the surface of the water or deposit in layers at the bottom, - Impart a noticeable taste of oil to fish, or - Produce harmful effects to fish.	
Non-ionized ammoniac (mg/L NH_3)	<0.005	<0.025
Total ammonium (mg/L NH_4)	<0.04	<1
Residual chlorine (mg/L HOCl)	-	<0.005
Total zinc (mg/L)	-	<0.3
Soluble copper (mg/L)	-	<0.04

Table B.10. Guide Values and Maximum Admissible Limit Values for Bathing Water

Parameter	Guide Value	Maximum Admissible Limit
Microbiological Parameters		
Total coliforms (/100 mL)	500	10,000
Thermotolerant coliforms (/100 mL)	100	2,000
Faecal streptococci (/100 mL)	100	-
Salmonellae (/L)	0	-
Enteroviruses (/10L)	0	-
Physicochemical Parameters		
pH	6-9	-

Parameter	Guide Value	Maximum Admissible Limit
Colour	No abnormal change in colour	No film visible on the surface of the water and no odour
Mineral oils (mg/L)	<0.3	-

International Guidelines

The LEPAP, similar to other projects considered for financing by the World Bank, is subject to Operational Policy (OP) 4.01 on Environmental Assessment (EA). Therefore, this EA report refers to national legislation and international conventions ratified by Lebanon as well as the World Bank policies and guidelines presented in the Pollution and Prevention Handbook of the World Bank.

The Pollution Prevention and Abatement Handbook sets maximum air emissions and discharge guidelines that apply to World Bank projects in the absence of national standards. The handbook also includes General Environmental Guidelines with emission levels normally acceptable to the World Bank as well as specific industry sector EHS guidelines. The specific guidelines are to be used together with the General EHS Guidelines document, which provides guidance to users on common EHS issues potentially applicable to all industry sectors.

IFC General EHS Guidelines

Ambient Air Quality

The IFC General EHS Guidelines (IFC/WB, 2007) state that in the absence of applicable national ambient air quality standards, internationally recognized standards, such as WHO or EU guidelines that are listed below should be applied. The emissions guidelines are applicable to small combustion process installations operating more than 500 hours per year, and those with an annual capacity utilization of more than 30 percent.

Table B.11. International Ambient Air Quality Standards

Parameter	Averaging Period	EU		WHO Ambient Air Quality Guidelines
		EU Ambient Air Quality Standard[3] (µg/m^3)	EU Permitted Number of Exceedances per Year	WHO Guideline Value (µg/m^3)
Sulphur dioxide (SO_2)	10 minute	-	-	500 (guideline)
	1-hour	350	24	-
	24 hour	125	3	125 (Interim target-1) 50 (Interim target-2) 20 (guideline)
Carbon monoxide (CO)	8-hour	10,000	N/A	-
Nitrogen dioxide (NO_2)	1-hour	200	18	200 (guideline)
	Annual	40	N/A	40 (guideline)
Ozone (O_3)	8-hour	120	25	160 (Interim target-1) 100 (guideline)

Parameter	Averaging Period	EU		WHO Ambient Air Quality Guidelines
		EU Ambient Air Quality Standard[3] (µg/m³)	EU Permitted Number of Exceedances per Year	WHO Guideline Value (µg/m³)
PM_{10}[1]	24-hour	50	35	150 (Interim target-1) 100 (Interim target-2) 75 (Interim target-3) 50 (guideline)
	Annual	40	N/A	70 (Interim target-1) 50 (Interim target-2) 30 (Interim target-3) 20 (guideline)
$PM_{2.5}$[2]	Annual	25	N/A	35 (Interim target-1) 25 (Interim target-2) 15 (Interim target-3) 10 (guideline)
	24-hour	-	-	75 (Interim target-1) 50 (Interim target-2) 37.5 (Interim target-3) 25 (guideline)

Notes:

1: PM_{10} denotes particulate matter of less than 10 microns in diameter.

2: $PM_{2.5}$ denotes particulate matter of less than 2.5 microns in diameter.

3: EU air quality requirements from Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe.

4: World Health Organization (WHO). Air Quality Guidelines Global Update, 2005. PM 24-hour value is the 99th percentile.

5: Interim targets are provided in recognition of the need for a staged approach to achieving the recommended guidelines.

Table B.12. Small Combustion Facilities Emissions Guidelines (3MWth - 50MWth) – (in mg/Nm^3 or as indicated)

Combustion Technology /Fuel	Particulate Matter (PM)	Sulphur Dioxide (SO_2)	Nitrogen Oxides (NOx)	Dry Gas, Excess O_2 Content (%)
Engine				
Gas	N/A	N/A	200 (Spark Ignition) 400 (Dual Fuel) 1,600 (Compression Ignition)	15
Liquid	50 or up to 100 if justified by project specific considerations (e.g. Economic feasibility of using lower ash content fuel, or adding secondary treatment to meet 50, and available environmental capacity of the site)	1.5 per cent Sulphur or up to 3.0 per cent Sulphur if justified by project specific considerations (e.g. Economic feasibility of using lower S content fuel, or adding secondary treatment to meet levels of using 1.5 per cent Sulphur, and available environmental capacity of the site)	If bore size diameter [mm] < 400: 1460 (or up to 1,600 if justified to maintain high energy efficiency.) If bore size diameter [mm] > or = 400: 1,850	15
Turbine				
Natural Gas =3MWth to < 15MWth	N/A	N/A	42 ppm (Electric generation) 100 ppm (Mechanical drive)	15
Natural Gas =15MWth to < 50MWth	N/A	N/A	25 ppm	15
Fuels other than Natural Gas =3MWth to < 15MWth	N/A	0.5 per cent Sulphur or lower per cent Sulphur (e.g. 0.2 per cent Sulphur) if commercially available without significant excess fuel cost	96 ppm (Electric generation) 150 ppm (Mechanical drive)	15
Fuels other than Natural Gas =15MWth to < 50MWth	N/A	0.5% S or lower % S (0.2%S) if commercially available without significant excess fuel cost	74 ppm	15
Boiler				
Gas	N/A	N/A	320	3
Liquid	50 or up to 150 if justified by environmental assessment	2,000	460	3
Solid	50 or up to 150 if justified by environmental assessment	2,000	650	6

Notes:

-N/A/ - no emissions guideline; Higher performance levels than these in the Table should be applicable to facilities located in urban / industrial areas with degraded airsheds or close to ecologically sensitive areas where more stringent emissions controls may be needed.; MWth is heat input on HHV basis; Solid fuels include biomass; Nm^3 is at one atmosphere pressure, 0°C.; MWth category is to apply to the entire facility consisting of multiple units that are reasonably considered to be emitted from a common stack except for NOx and PM limits for turbines and boilers. Guideline values apply to facilities operating more than 500 hours per year with an annual capacity utilisation factor of more than 30 per cent.

Wastewater

As stated in the IFC General EHS Guidelines(IFC/WB, 2007), sewage from an industrial facility to be discharged to surface water is to be treated to meet national or local standards for sanitary wastewater discharges or, in their absence, the indicative guideline values applicable to sanitary wastewater discharges shown below.

Table B.13. Indicative Values for Treated Sanitary Sewage Discharge[1]

Pollutant	Units	Guideline Value
pH	pH	6-9
BOD	mg/L	30
COD	mg/L	125
Total nitrogen	mg/L	10
Total phosphorus	mg/L	2
Oil and Grease	mg/L	10
Total suspended solids	mg/L	50
Total coliform bacteria	MPN/100mL	400

Notes:

1: Not applicable to centralised, municipal, wastewater treatment systems which are included in EHS Guidelines for Water and Sanitation

2: MPN= Most Probable Number

Noise

The maximum permissible ambient noise levels in the different environmental settings set by the IFC guidelines are presented below. The guidelines also state that noise impacts should not result in a maximum increase in background levels of 3 dB at the nearest receptor location off-site (IFC/WB, 2007).

Table B.14. Noise Levels Guidelines

Receptor	One Hour LAeq in dB(A)	
	Day (07:00-22:00)	Night (22:00-07:00)
Residential, institutional, educational	55	45
Industrial, commercial	70	70

Specific Industry Sector EHS Guidelines

Specific industry sector EHS guidelines relevant to the LEPAP were identified based on the potential applicants as follows:

- EHS guidelines for Pulp and Paper Mills
- EHS guidelines for Mammalian Livestock Production
- EHS guidelines for Poultry Production
- EHS guidelines for Vegetable Oil Processing
- EHS guidelines for Dairy Processing
- EHS guidelines for Meat Processing
- EHS guidelines for Poultry Processing

- EHS guidelines for Breweries
- EHS guidelines for Food and Beverage Processing
- EHS guidelines for Pharmaceuticals and Biotechnology Manufacturing
- EHS guidelines for Phosphate Fertilizer Manufacturing
- EHS guidelines for Pesticides Formulation, Manufacturing and Packaging
- EHS guidelines for Cement and Lime Manufacturing
- EHS guidelines for Ceramic Tile and Sanitary Ware Manufacturing
- EHS guidelines for Glass Manufacturing
- EHS guidelines for Construction Materials Extraction
- EHS guidelines for Textiles Manufacturing
- EHS guidelines for Tanning and Leather Finishing
- EHS guidelines for Printing
- EHS guidelines for Foundries
- EHS guidelines for Base Metal Smelting and Refining
- EHS guidelines for Metal, Plastic, Rubber Products Manufacturing

Appendix C PIF

LEBANON ENVIRONMENTAL POLLUTION ABATEMENT PROJECT

Sub-Project Identification Form

Sub-project Title:

Type of Sub-project:

- ☐ Pollution Prevention
- ☐ Resource Recovery
- ☐ Clean Technology Adoption
- ☐ Fuel Substitution
- ☐ Waste Minimization
- ☐ End-of-Pipe Treatment

A. Enterprise identification:

1. General Information:

Name of Facility:		
Address:		
Website:		
Industrial Operation Permit:		
Creditworthiness status:	☒ Confirmed	☐ Not Confirmed
Name of Participating Bank:		

2. Industry Contact Person:

Name:	
Position/Title:	
Landline:	
Mobile:	
Fax:	
Email:	

3. Participating Bank Contact Person :

Name:	
Position/Title:	
Landline:	
Mobile:	
Fax:	

Email:	

B. <u>Enterprise Footprint and sector:</u>

Total area of premises [in m^2]:			
Type of area:	☐ Industrial ☐ Residential ☐ Agricultural ☐ Sensitive area[1] ☐ Other**:**		
Surrounding area (500 m radius from premises limits) inhabited:	☐ Yes ☐ No		
Total number of employees:			
Sub-Sector and Industrial Category according to MoI Decree No. 5243/2001 or other industries such as Tourism industry under ISIC V.4			
Compliance deadline according to MoE decision No. 539/1-2015			
Main Products:			
Approximate yearly production:			
Industry status:	Existing ☐	Operational ☐ Not operational ☐	Modification ☐ Extension ☐ Expansion ☐ Rehabilitation ☐
	New ☐		
Required Studies	*Study*	*Required for the whole industry*	*Status*
	EA	Yes ☐ No ☐	
	ESIA	Yes ☐ No ☐	
	LESIA	Yes ☐ No ☐	
	CAP	Yes ☐ No ☐	

[1] Protected area, densely populated urban areas, industrial zone with high cumulative impacts of pollution

Kind of Generated Pollution (see quantity under D.)	Air ☐ Water ☐ Solid waste ☐

C. <u>Sub-project:</u>

Sub-project Objectives:			
Sub-project description and components:			
Applicable screening criteria	Yes	No	Comments
1. Involuntary Resettlement Risk			
1.1. Potential for physical relocation	☐	☐	
1.2. Potential for economic displacement	☐	☐	
1.3. Potential for loss of access to assets	☐	☐	
1.4. Potential for complaints from surrounding population	☐	☐	
2. Occupational Health and Safety Risks			
2.1. Possible need for fire protection equipment or personal protective equipment in the vicinity of the sub-project	☐	☐	
2.2. Potential for high level noise (intermittent or continuous) resulting from the sub-project's operation	☐	☐	
2.3. Risks and vulnerabilities related to OHS due to physical, chemical, biological hazards during sub-project construction and/or operation	☐	☐	
3. Labor and Working Conditions			

3.1. Compliance of labor working conditions with national law	☐	☐	
3.2. Availability of non-discrimination policy	☐	☐	
3.3. Recruitment of personnel aged less than 14 years of age	☐	☐	
3.4. Possibility of exposing young employees (14-18 years of age) to risks affecting their life, health, physical, mental, spiritual, moral or social development	☐	☐	
3.5. Availability of a mechanism for raising workplace concerns to management	☐	☐	
4. *Environmental and Social Risks of Sub-Project*			
4.1. Potential impacts of the sub-project's operation on air, soil and water	☐	☐	
4.2. Generation of wastewater from the sub-project's operation	☐	☐	
4.3. Potential odors and/or air emissions resulting from the sub-project's operation	☐	☐	
4.4. Potential generation of solid waste from the sub-project's operation	☐	☐	
4.5. Potential generation of hazardous waste from the sub-project's operation	☐	☐	
4.6. Potential generation of waste which cannot be treated, reused, recycled of disposed of in an environmentally and socially sound matter	☐	☐	
4.7. Potential impacts of the subproject on biodiversity	☐	☐	
4.8. Operation of sub-project requiring high consumption	☐	☐	

of raw materials, water and energy			
Environmental and Social Risk level	☐ Low risk ☐ Medium risk ☐ High risk		
Category as per ESA:	Category II		
Estimated Project Cost:			
i) Capital Costs			
ii) LEPAP potential financing			
iii) Estimated Annual Operation & Maintenance cost			
Project Viability (BCA)	Yes ☐	No ☐	
	NPV@6%:	IRR:	PV B/C ratio:
TA provided by the LEPAP team:			

Environmental safeguards requirements for sub-projects:	*Study*	*Required for sub-project*		*Status*
	Feasibility Study	Yes ☐	No ☐	
	Technical Assessment	Yes ☐	No ☐	
	ESIA	Yes ☐	No ☐	
	ESMP	Yes ☐	No ☐	
	Resettlement Action Plan	Yes ☐	No ☐	

Expected Preparation schedule of Environmental safeguards:	*Milestone*	*Expected Date*
	Identification of required studies	
	Recruitment of Consultant/Company	
	Preparation of the study	
	Review/approval by MoE/LEPAP and WB	

Expected implementation schedule of the sub-project:	*Milestone*	*Expected Date*
	Design & Technical Specs	
	Execution	
	Operation	

D. <u>Expected Reduction of Pollutants:</u> .

Parameters	*Before the Project*	*After the Project*

Appendix D Code of Conduct

Good Practice Note

Addressing Gender Based Violence
in
Investment Project Financing involving Major Civil Works

28 September 2018

Acknowledgements

This Good Practice Note was prepared by a team from the Transport Global Practice (GGITR) and the Gender Group (GTGDR), comprised of Christopher R. Bennett (Lead Transport Specialist, GTDDR), Diana J. Arango (Senior Gender Specialist, GTGDR), Nora Weisskopf (Transport Specialist, GTDDR) and Keelye Hanmer (Transport Analyst, GTDDR) under the guidance of Franz Drees-Gross (Director, GGITR), Caren Grown (Senior Director, GTGDR) and Maninder Gill (Director, GSUSD).

Key inputs and support were provided by Verena Phipps (Senior Social Development Specialist, GSU07), Deviyani Dixit (Consultant, GTDDR), Michael Mahrt (Senior Program Officer, GGOOS), Subha Latchmi Ram (Team Assistant, EACNF), Qays Hamad (Operations Advisor, OPSES), Nathalie Munzberg (Regional Safeguards Advisor, OPSES), Tesfaalem Gebreiyesus (Lead Procurement Specialist, OPSPR) and the GTDDR Task Force for GBV members, including Karla Gonzalez Carvajal (Practice Manager), Julie Babinard (Senior Transport Specialist), Karla Dominguez Gonzalez (Gender Specialist), and Nato Kurshitashvili (Gender Specialist).

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Abbreviations

CEMAC	Central African Economic and Monetary Community
C-ESMP	Contractor's Environmental and Social Management Plan
CMU	Country Management Unit
CoC	Code of Conduct
DEVAW	United Nations Declaration on the Elimination of Violence against Women
DV	Domestic Violence
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FSV	Family and Sexual Violence
FSW	Female Sex Worker
GBV	Gender-based Violence
GCT	GBV Complaints Team
GPN	Good Practice Note
GRM	Grievance Redress Mechanism
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
IA	Implementing Agency
ICB	International Competitive Bidding
IPF	Investment Project Financing
IPV	Intimate Partner Violence
ISR	Implementation Status Report
IVA	Independent Verification Agent
M&E	Monitoring and Evaluation
NCB	National Competitive Bidding
NGO	Nongovernmental Organization
OHS	Occupational Health and Safety
PCN	Project Concept Note
PMU	Project Management Unit (also often referred to as a Project Implementation Unit, or PIU)
QER	Quality Enhancement Review
SBD	Standard Bidding Document
SEA	Sexual exploitation and abuse
SH	Sexual harassment
SEP	Stakeholder Engagement Plan
SIRT	Safeguards Incident Response Toolkit
SPD	Standard Procurement Document (also Standard Bidding Document, SBD)
STI	Sexually Transmitted Infection
TOR	Terms of Reference
TPM	Third-Party Monitor for GBV
UN	United Nations
UNICEF	United Nations International Children's Fund
VAC	Violence Against Children
VAWG	Violence Against Women and Girls
WHO	World Health Organization

Key Terms and Definitions

Violence against women and girls (VAWG)	The 1993 UN *Declaration on the Elimination of Violence against Women* defined violence against women and girls as any act of gender-based violence that results in, or is likely to result in, physical, sexual or mental harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life (Article 1). Violence against women and girls shall be understood to encompass, but not be limited to, the following: • Physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation; • Physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced sex work; • Physical, sexual and psychological violence perpetrated or condoned by the State, wherever it occurs (Article 2). Violence against women and girls is a manifestation of historically unequal power relations between men and women, which have led to domination over and discrimination against women by men and to the prevention of the full advancement of women.
Gender-based violence (GBV)	Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private (IASC 2015). Women and girls are disproportionately affected by GBV across the globe.
Sexual harassment (SH)	Unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between personnel/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on the procedures to report each. Both women and men can experience SH.
Sexual Exploitation and Abuse (SEA)	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is further defined as "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions." Women, girls, boys and men can experience SEA. In the context of World Bank supported projects, project beneficiaries or members of project-affected communities may experience SEA.
Child/ Forced early Marriage	Forced marriage is the marriage of an individual against her or his will. Child marriage is a formal marriage or informal union before age 18. Even though some countries permit marriage before age 18, international human rights standards classify these as child marriages, reasoning that those under age 18 are unable to give informed consent. Therefore, child marriage is a form of forced marriage as children are not legally competent to agree to such unions (IASC 2015).
Human Trafficking	The recruitment, transportation, transfer, harboring or receipt of persons, by means of force, the threat of force, other forms of coercion, abduction, fraud, deception, of the abuse of power, or of a position of vulnerability, or giving or receiving of payments or benefits to achieve the consent of a person, having control over another person, for the purpose of exploitation. Exploitation includes, at a minimum, the exploitation of the sex work of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs (United Nations 2000. Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children).

Survivor Centred Approach	The survivor-centred approach is based on a set of principles and skills designed to guide professionals-- regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centred approach aims to create a supportive environment in which the survivor's rights are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

1. Introduction

1. The World Bank Group considers that no country, community, or economy can achieve its potential or meet the challenges of the 21st century without the full and equal participation of women and men, girls and boys. It is committed to closing gaps between males and females globally for lasting impact in tackling poverty and driving sustainable economic growth that benefits all (World Bank, 2018).[1]

2. Thirty-five percent of women worldwide have experienced either non-partner sexual violence or physical and/or sexual intimate partner violence (IPV) (WHO 2013), both manifestations of Gender-Based Violence (GBV).[2] Major civil works[3]can exacerbate the risk of GBV in both public and private spaces by a range of perpetrators in a number of ways, for example:

    - Projects with a large influx of workers may increase the demand for sex work—even increase the risk for trafficking of women for the purposes of sex work—or the risk of forced early marriage in a community where marriage to an employed man is seen as the best livelihood strategy for an adolescent girl. Furthermore, higher wages for workers in a community can lead to an increase in transactional sex. The risk of incidents of sex between laborers and minors, even when it is not transactional, can also increase.

    - Projects create changes in the communities in which they operate and can cause shifts in power dynamics between community members and within households. Male jealousy, a key driver of GBV, can be triggered by labor influx on a project when workers are believed to be interacting with community women. Hence, abusive behavior can occur not only between project-related staff and those living in and around the project site, but also within the homes of those affected by the project.

    - When land redistribution occurs—for example due to resettlement for civil works—women may be extremely vulnerable to GBV. This is particularly true in countries where the legal systems preclude women from holding land titles.

    - Women and girls' job opportunities are limited due to a lack of appropriate transportation options. When creating job opportunities for women within projects, teams should be aware that traveling to and from work in some settings can force women and girls to use unsafe, poorly lit commuter routes, or unsafe public transport. Increased risk of violence is experienced when women are confronted with traveling long distances to access work opportunities or forced to travel at night.

3. This Good Practice Note (GPN) was prepared to assist Task Teams in establishing an approach to identifying risks of GBV, in particular Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), that can emerge in IPF with major civil works contracts and to advise Borrowers accordingly on how to best manage such risks. The GPN builds on World Bank experience and good international industry practices, including those of other development partners. While World Bank Task Teams are the primary audience, the GPN also aims to contribute to a growing knowledge base on the subject.

4. While this GPN is being issued in the context of the introduction of the World Bank's new 'Environmental and Social Framework' (ESF), it is designed to support Task Teams working on new projects being prepared under the ESF, as well as projects that are currently under preparation or implementation that are subject to the safeguards framework that pre-dates the ESF.

5. The ESF's Environmental and Social Standards (ESS) set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported

[1] http://www.worldbank.org/en/topic/gender

[2] GBV also affects men, boys and sexual minorities or those with gender-non-conforming identities. Disproportionately, however, GBV affects women and girls throughout their lifecycle, with profound, long-term impacts on health, agency, achievement and well-being

[3] Major civil works include construction, maintenance and/or upgrading of infrastructure (transport, energy, water & sanitation, irrigation and urban infrastructure, school or hospital construction, etc.) and related supervision oversight, as well as technical assistance activities related to such projects.

by the World Bank. This GPN provides good practice for Task Teams on addressing GBV risks and impacts in the context of the ESF, including the following ESF standards, as well as the safeguards policies that pre-date the ESF:

- ESS 1: Assessment and Management of Environmental and Social Risks and Impacts;
- ESS 2: Labor and Working Conditions;
- ESS 4: Community Health and Safety; and
- ESS 10: Stakeholder Engagement and Information Disclosure.

6. This GPN was informed by, and builds on the recommendations of the 2017 Independent Task Force Report [4] of external experts, "*Working together to prevent sexual exploitation and abuse : recommendations for World Bank investment projects"* (hereinafter called the '2017 GBV Task Force Report'), 2017 GBV Task Force Report, which provided guidance on how the World Bank could strengthen its systems to prevent and mitigate GBV, in particular SEA and SH.

7. This GPN is guided by several key principles reflected in the 2017 GBV Task Force Report:

- *Be survivor-centered*: Approach considerations related to GBV prevention, mitigation and response through a survivor-centered lens[5], protecting the confidentiality of survivors, recognizing them as principle decision-makers in their own care and treating them with agency, dignity and respect for their needs and wishes.
- *Emphasize prevention*: Adopt risk-based approaches that aim to identify key risks of GBV and to undertake measures to prevent or minimize harm.
- *Build on existing local knowledge:* Engage community partners—local leaders, civil society organizations, gender and child advocates— as resources for knowledge on local level risks, effective protective factors and mechanisms for support throughout the project cycle.
- *Be evidenced-based:* Build on existing global research and knowledge on how to address GBV effectively.
- *Be adaptable*: Operational guidance presented in this note provides the foundation for an effective GBV risk management approach; adapt and adjust mitigation measures to respond to the unique drivers and context in any given setting.
- *Enable continuous monitoring and learning*: Ensure operations integrate mechanisms for regular monitoring and feedback to track effectiveness and to build internal knowledge of what works to prevent, mitigate and respond to GBV.

Scope of this GPN

8. This GPN sets out good practice for Task Teams on identifying, assessing and managing the risks of GBV in the context of Bank-financed IPF projects in any World Bank Global Practice that involve major civil works, defined here as civil works large enough to be carried out by a contractor, i.e., not small-scale projects such as community-driven development investments which often involve self-construction by beneficiary communities. The GPN does not focus on preventing GBV through specific infrastructure related interventions related to design (e.g. the lack of well-lit public transit spaces, construction of schools with toilets that are lockable and physically located in opposite areas for girls and boys). Some examples of how to prevent and respond to GBV through project design and implementation can be found in the online resource: Violence Against Women and Girls Resource Guide.

9. Major civil works can be associated with an increase in GBV risks along four broad categories described in Figure 1. This GPN focuses on two of the four GBV risk categories that can arise in the context of IPFs that involve major civil works -- SEA and Workplace SH. (see **Figure 1**).

[4] Gupta, Geeta Rao and Katherine Sierra (2017). Working Together to Prevent Sexual Exploitation and Abuse: Recommendations for World Bank Investment Projects (English). Report of the Global Gender-based Violence Task Force. Washington, D.C. World Bank Group. http://documents.worldbank.org/curated/en/482251502095751999/Working-together-to-prevent-sexual-exploitation-and-abuse-recommendations-for-World-Bank-investment-projects.

[5] See glossary of terms for the definition of a survivor-centered approach

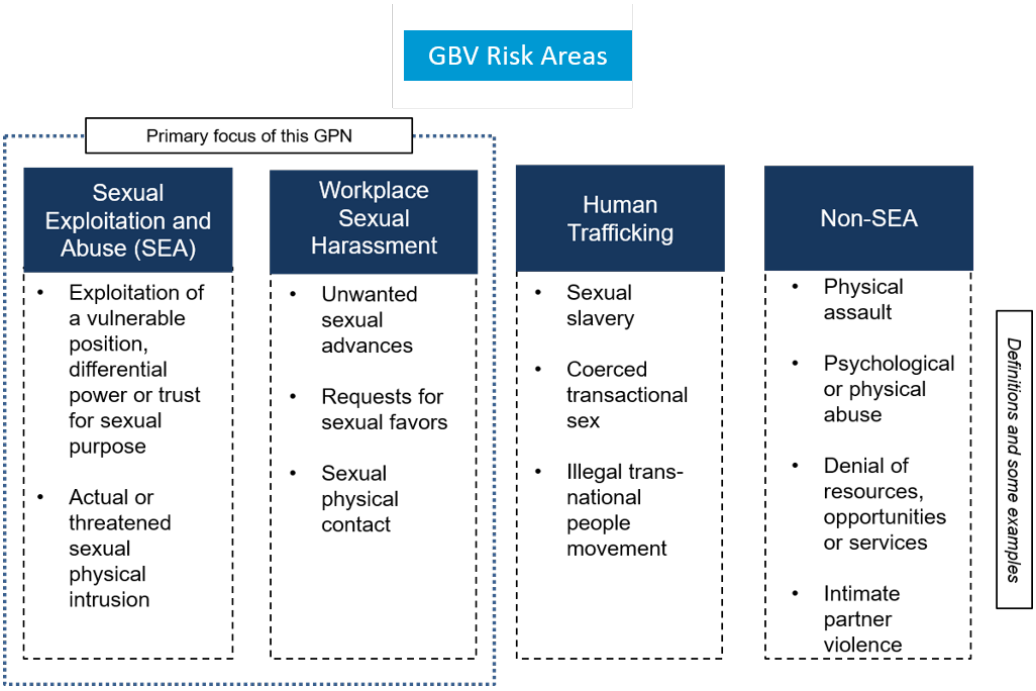

Figure 1: GBV Risk Areas

Structure of this GPN

10. The GPN is structured around three key steps that cover actions to be undertaken during project preparation and implementation (see **Figure 2**).

    - Firstly, identify and **assess** the risks of GBV, including social and capacity assessments, and include measures for their mitigation in project design. Ideally, this is done during project preparation, with the understanding that GBV risk assessment is a continuous process and should take place throughout the project life cycle as GBV can occur at any moment.
    - Secondly, **address** the risks by identifying and implementing appropriate GBV risk mitigation and monitoring measures on an ongoing basis during project implementation.
    - Thirdly, **respond** to any identified GBV incidents, whether related to the project or not, ensuring that effective monitoring and evaluation (M&E) mechanisms, which meet the World Bank's internal safeguard and GBV reporting requirements, are in place to report on such incidents and to monitor follow up.

11. This GPN is supplemented with Resource materials for Task Teams, including Terms of References (TOR), and examples of Codes of Conduct (CoC) and assessments including the GBV Thematic Group Website.

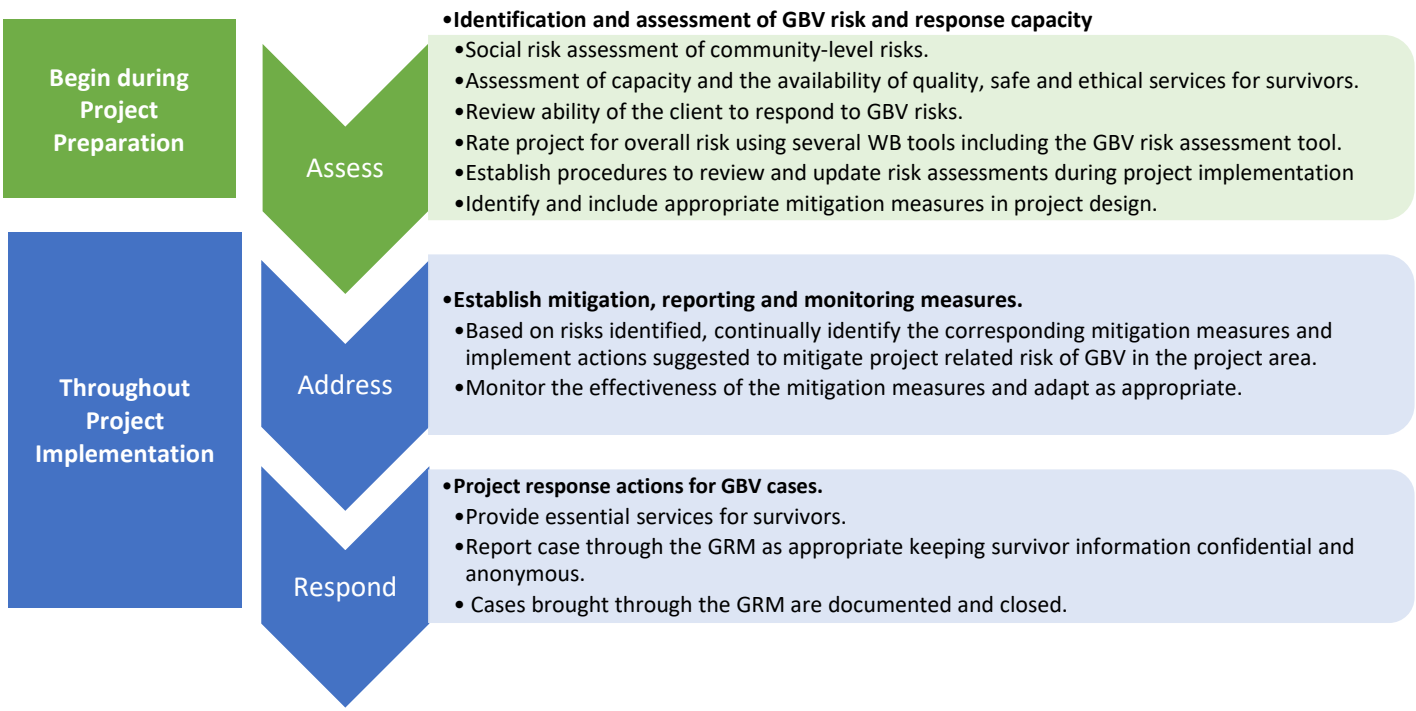

Figure 2. Assessing, Addressing and Responding to GBV Risks in IPF Involving Major Civil Works

2. GBV Considerations in Infrastructure Investment Project Financing Involving Major Civil Works

2.1 Definition of GBV

12. GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV disproportionately affects women and girls across their lifespan and takes many forms, including sexual, physical, and psychological abuse. It occurs at home, on the streets, in schools, workplaces, farm fields, and refugee camps; during times of peace as well as in conflicts and crises.

13. The term GBV is most commonly used to underscore systemic inequality between males and females[6]—which exists in every society in the world—and acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls (VAWG).[7] The term GBV stems from the 1993 United Nations Declaration on the Elimination of Violence against Women, which defines violence against women as "any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women." Discrimination on the basis of sex or gender identity is not only a cause of many forms of GBV, but also contributes to the widespread acceptance and invisibility of such violence—so that perpetrators are not held accountable and survivors are discouraged from speaking out and accessing support.

14. Manifestations of GBV include, but are not limited to:

- Physical violence (such as slapping, kicking, hitting, or the use of weapons);
- Emotional abuse (such as systematic humiliation, controlling behavior, degrading treatment, insults, and threats);
- Sexual violence, which includes any form of non-consensual sexual contact, including rape;
- Early/forced marriage, which is the marriage of an individual against her or his will often occurring before the age of 18, also referred to as child marriage;
- Economic abuse and the denial of resources, services, and opportunities (such as restricting access to financial, health, educational, or other resources with the purpose of controlling or subjugating a person);
- Trafficking and abduction for exploitation; and,
- IPV perpetrated by a former or current partner, includes a range of acts of violence.

15. To understand if an act of violence is an act of GBV, one should consider whether the act reflects and/or reinforces unequal power relations between males and females.

16. Many—but not all—forms of GBV are criminal acts in national laws and policies. This differs from country to country, and the practical implementation of laws and policies can vary widely. Widespread impunity is a constant barrier—in developed and developing countries—and weak implementation of laws almost a universal characteristic in low- and middle-income settings.

2.2 GBV and Consent

17. **Consent** is a key consideration in GBV particularly with regards to SEA and SH. GBV arises when consent is not voluntarily and freely given. Consent must be informed, based upon a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give informed consent, the individual

[6] Although usually referring to violence perpetrated by men against women, GBV also affects those in the 'Lesbian, Gay, Bisexual, and Transgender' (LBGT) population. The mitigation measures proposed here apply to all GBV-affected individuals.

[7] The term GBV is often used interchangeably with Violence against Women and Girls (VAWG). See Arango, D., Morton, M. Gennari, F., Kiplesund, S, and Ellsberg, M. (2014). Interventions to Prevent and Reduce Violence Against Women and Girls: A Systematic Review of Reviews. Women's Voice, Agency, and Participation Research Series. Washington, DC: World Bank.

concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force or threats). There are instances where consent might not be possible due to cognitive impairments and/or physical, sensory, or developmental disabilities.

18. Children are considered unable to provide informed consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. Article 1 of the United Nations 'Convention on the Rights of the Child[8] considers that children are those under the age of 18. The UN Secretary General's Secretary's bulletin on Special Measures for protection from sexual exploitation and abuse October 9, 2003 ST/SGB/2003/13 also defines children as anyone under the ae of 18 and explicitly prohibits sexual activity with a child regardless of the age of majority or age of consent locally (para 3.2 b). This definition was also used in the 2017 GBV Task Force Report. **As a result, the World Bank considers children[9] as anyone under the age of 18—even if national law may have a lower age—and, as such, not able to give free and voluntary consent.** As shown in Annex 1, this definition is reflected in the CoC requirements in the World Bank's Standard Procurement Documents (SPDs). Mistaken belief regarding the age of the child and consent from the child is not a defense for SEA of children. Sexual activity with individuals below the age of 18 is therefore considered child sexual abuse, except in cases of pre-existing marriage.[10]

2.3 GBV and Children

19. Child sexual abuse includes any form of sexual relations with a child, bearing in mind that a child cannot give consent. The United Nations International Children's Fund (UNICEF) estimates that 10 percent of girls worldwide under the age of 18 (approximately 120 million worldwide) have experienced rape or other unwanted sexual acts. Boys also report sexual abuse, although usually at lower levels than girls.

20. There is a high co-occurrence of VAW and Violence against children (VAC) and risk factors are shared amongst them: unequal gender norms and discrimination, lack of responsive institutions, weak legal sanctions and impunity for violence against children (VAC), cultural and legal acceptance of certain types of VAC, male dominance in the household, marital conflict with violence used for conflict resolution, and the harmful use of alcohol and drugs. Moreover, the link between witnessing violence in childhood and perpetrating or experiencing violence in adulthood is so strong that by preventing exposure to violence in childhood the likelihood of preventing violence in adulthood and future generations is high.

21. Treating children who have experienced violence, including sexual violence, necessitates specific measures that differs from the response to GBV on certain key issues and are outside the scope of this GPN.[11]

2.4 GBV Perpetrators

22. For the purposes of this GPN, potential perpetrators of GBV can be any individuals associated with major civil works under a Bank-financed project including construction workers and other personnel of the contractor,

[8] Article 34 of the Convention on the Rights of the Child states parties should undertake specific measures to protect the child from all forms of sexual exploitation and sexual abuse. Every member of the United Nations, except the United States, is a party to the Convention.

[9] In this GPN the term 'child' is used interchangeably with the term 'minor' and refers to a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.

[10] The age of consent has important implications for workers employed on World Bank financed projects. If a worker is married to someone under the age of 18 and that marriage is recognized by a public, religious or customary authority and consistent with the legal age for marriage in the country, such under-age marriage shall not constitute a reason not to employ the worker. Under any circumstances other than these, Codes of Conduct shall prohibit workers from engaging in sexual intercourse with anyone under the age of 18. If a worker engages in sexual intercourse with anyone under the age of 18 while employed under the project, a range of employment sanctions shall apply, as set out in the Code of Conduct, following a full and fair review.

[11] External resources covering response to VAC include: (i) Responding to children and adolescents who have been sexually abused – WHO (ii) Caring for Child Survivors of Sexual Abuse – IRC and UNICEF; and (iii) INSPIRE: Seven strategies for Ending Violence Against Children

consultants supervising the civil works or undertaking technical assistance activities or studies relating to the civil works or the security personnel hired to protect a civil works site.

23. When consideration GBV risks associated with labor influx, it is also important to assess the changes in local power dynamics that may contribute to increase of GBV risks that may be perpetrated by local workers or partners of local women and girls. It is therefore important to consider broadly the range of potential perpetrators, combined with other contextual and project-related risks, to ensure projects integrate appropriate GBV risk mitigation strategies. For example, it is not enough to focus only on non-local workers that will be employed through the project as potential perpetrators. In activities to raise awareness of GBV and service provision, violence that occurs at the hands of a variety of perpetrators should be addressed.

2.5 GBV and Labor Influx

24. Projects involving major civil works often require a labor force and associated goods and services that cannot be fully met by local supply. Where this occurs, a labor force may be brought in from outside of the project area (either from other countries or other regions in a country) which may increase risks of GBV.

25. The [World Bank's] guidance to staff on identifying, assessing and managing the risks of adverse social and environmental impacts that are associated with the temporary influx of labor in the context of Bank-financed IPF projects is set out in the 2016 Labor Influx Guidance Note. The Guidance Note aims to help Task Teams screen projects to identify the risk profile for labor influx as the basis for helping the Borrower design the appropriate measures to mitigate the relevant risks and impacts. The two key considerations of the labor influx impact risk profile are: (i) the scale of the labor influx; and (ii) the "absorptive capacity" of the local community to accommodate this influx. For example, an influx of 100 workers in a major urban area would generally have a low impact, while the same number in a remote rural area, or one where Indigenous Peoples live, would normally have a high impact. Other factors (e.g. cultural, duration of works) may further refine the risk assessment. Labor influx risk is a key element to be considered when assessing GBV risk, in particular SEA and SH. Further information is given in the 2016 Labor Influx Guidance Note.

3 Assessing GBV Risks and Capacity to Respond

3.1 Introduction

26. When identifying risks, it is important to understand that there is no single driver of GBV. Experiencing GBV affects well-being, agency,[12] and self-actualization, including educational achievement, livelihood and employment prospects, physical and emotional health, involvement in civic activities, and many more.

27. GBV is experienced predominantly by women across all social and income groups. Research has identified multiple risk factors for GBV at the individual, relationship, community, institutional and policy levels. These include male-dominated household decision-making and income, policies and laws that discriminate against women, and cultural norms that justify or condone the use of violence against women and girls as a form of conflict resolution or discipline.

28. In the 2017 GBV Task Force Report, Table 1 (copied below as **Figure 3**) uses the ecological framework model[13] to identify how IPF with major civil works can exacerbate the existing GBV risks or create new ones. Identifying and understanding project-related risk factors as they interact with other contextual risk factors is critical for development of appropriate prevention measures in project design. **Risks change over time, so it is essential they are continuously monitored throughout the life of a project.**

SOCIETAL	COMMUNITY	MALE PERPETRATOR	FAMILY	INDIVIDUAL
WORLD BANK PROJECT-RELATED				
National, regional • Higher levels of GBV than regional average • Low education levels of national labor force • Limited services; low capacity for service provision for survivors; in particular, limited or no judicial or police services to facilitate redress for survivors • Lack of specific legislation addressing incidence of GBV	*Project size* • Geographic span of projects and communities that the project affects (e.g., larger projects intersect with more communities and are harder to monitor) • Duration—longer term projects increase risk *Project-affected population* • Small host community, unable to absorb large influx of workers • Rural host community lacking access to services and institutions, low capacity for absorption • Unequal participation of community members in community consultations	*Project workers* • Not local • Lack of sanctions for inappropriate behavior from employer • Increase in income of workers distorts power balance between workers and communities • Increase in income enables transactional sex and exploitative relationships	*Working with **only** men or women in a household*	*Lack of information on how to report project-induced grievances*

Figure 3: Risk Factors that Can Contribute to GBV in World Bank-Financed Projects with Major Civil Works

[12] At the individual level, a*gency* means the capacity to make decisions about one's own life and act on them to achieve a desired outcome, free of violence, retribution, or fear.

[13] The ecological framework for understanding GBV is fully presented in the 2017 GBV Task Force Report, and in the Violence Against Women and Girls Resource Guide introduction.

29. All World Bank-financed IPF with major civil works currently under preparation and implementation should assess the risks that they may have related to GBV, and identify and implement mitigation measures to address those risks. There are two considerations:

- **GBV Risk Assessment**: assessment of the risk of exacerbation of GBV at the community level; and,
- **Capacity Assessment**: assessment of the local capacity to prevent and respond to GBV, including the availability of safe and ethical service provision for survivors.

30. To assess the project-related risk of exacerbating GBV, there are two essential issues to consider. First, the country and/or regional context in which the projects takes place, and second, the potential risks that the project may bring. These GBV risks need to be assessed throughout the project's life by monitoring the situation, assessing the effectiveness of risk mitigation measures, and adapting them accordingly (see **Figure 4**). When continuous monitoring efforts detect changes to the identified GBV risks and/or actual incidences of GBV, projects will need to adapt the GBV risk level and mitigation strategy. Additional guidance helpful for continuously monitoring GBV risk can be found under the 'Integrate' tab of the 'Violence Against Women and Girls Resource Guide' and in each accompanying sectoral brief.

Figure 4. GBV Risk Management Cycle Throughout Project Life

31. The key outcome of these risk assessments should be the classification of the project as at **Low, Medium, Substantial or High risk** of GBV. This rating will then feed into the overall Social Risk Rating of the project. The level of GBV-related risk in a project is assessed with the help of the GBV risk assessment tool. The assessed GBV risk level is factored into the project's overall social risk, which, in turn, is factored into the overall environmental and social risk associated with a project. The project's overall environmental and social risk is at least as high as the level of overall social risk, which, in turn, is at least as high as the level of GBV risk in a project. In other words, the overall social risk or the overall environmental and social risk in a given project cannot be lower than the level of GBV risk in the project. It is then recommended that the appropriate mitigation and monitoring measures (Chapter 4) are implemented based on this risk rating.

3.2 Risk Assessment

32. The assessment of GBV risk has to be undertaken both by the client and the World Bank Task Teams. For the client, the assessment of GBV risks on a project is normally undertaken as part of project preparation, particularly during community consultations. For the Task Team the assessment of risk should be done through the World Bank's GBV Risk Assessment Tool. Both assessments are detailed below.

33. When considering GBV risks, there are different "areas of impact" that influence both the nature of the risk, and the appropriate mitigation measures that a project can implement:

- The **project site** is the location where the project's activities are being undertaken. This includes both the actual locations where civil works are conducted, but also the associated areas such as the locations of workers' camps, quarries, etc.
- The project **adjoining communities** is generally the broader geographic area around of the project. This extends beyond the specific location where civil works are being carried out into the wider surroundings. Neighboring communities are at risk of GBV, particularly when workers are highly mobile.
- There are also **regional and national** areas of impact that will not be affected by specific interventions on a project, but may benefit through institutional strengthening and other efforts to address GBV risks. An assessment at the regional and/or national level can give clients and Task Teams an understanding of those 34 experiencing GBV in that country and can give a sense of the type and scale of violence and its acceptability in the communities where World Bank-financed projects are implemented. For example, the less equality between men and women and the more violence against women and girls, the more likely it is that the project will inadvertently reinforce these situations if it does not proactively acknowledge and seek to mitigate this risk.

34. In most cases, the necessary information on the prevalence of GBV from the project to the national level is already available. Clients and Task Teams should rely on existing studies and research to guide their decision-making. Creating **baseline GBV surveys for the purpose of risk assessment should be avoided**. As discussed in Annex 2, extreme care needs to be taken when considering collecting information on GBV to assess risks.

35. Fragile or conflict-affected environments need to be carefully considered when assessing GBV risks for a project. In such environments communities may have undergone traumatic experiences and the social fabric may be broken down. Further, as a result of insecurity and conflict, the required support services and care are often limited. There may be a lack of security for communities and rampant impunity for crimes committed. Supervision of projects in such areas is difficult and, in some instances, requires reinforced security arrangements. Contractors may need to recruit police, peacekeepers or military personnel for security, however, these forces may not be subject to the national legal system but have their own internal judicial mechanisms that may either not have adequate enforcement, or not specifically prohibit GBV, especially SEA. The combination of these factors can significantly increase the risk for GBV and should be carefully considered in project preparation and implementation. Annex 3 provides a case study for how this has been done in the Central African Economic and Monetary Community (CEMAC) Transport and Transit Facilitation Project in Cameroon.

World Bank GBV Risk Assessment Tool

36. A tool for Task Teams to assess the risk of GBV, particularly SEA, has been developed by the World Bank and is available here for World Bank staff.[14] The tool helps Task Teams understand the issues and risks of GBV in the project areas. It takes into consideration both project-specific details, such as labor influx levels, as well as the country context[15] where the project takes place—such as situations of conflict. Through 25 questions, 12 to be answered by the project team and 13 that are prepopulated, the tool draws on information to give each project a risk 'score' based on the responses to the questions. The questions are meant only as a starting point, and are not intended to be exhaustive.

37. The risk score is calculated on a scale of 0 to 25: projects that score 0-12.25 are considered '**Low**' risk; 12.5-16 '**Moderate**' risk; and projects that score 16.25-18 represent a '**Substantial**' risk, and project that score 18.25-25 are considered '**High**' risk projects.

38. The GBV Risk Assessment Tool is designed to be applied at the outset of a new project. It is recommended that the GBV risk rating be included in the Project Concept Note (PCN) for consideration at the PCN review meeting. On the basis of additional information gathered during project preparation, the risk should be updated as appropriate for the Quality Enhancement Review (QER) meeting or at the Decision Review meeting.

[14] http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx

[15] Country context considerations are already populated automatically and require no additional input.

39. As with any tool, there may be situations where it is prudent to adopt a higher risk category than the tool suggests, if local conditions warrant. It should be emphasized that estimating GBV risk is not an exact science. The tool is meant to help launch the Task Team on a path to understanding how the proposed project may have GBV-related impacts. The tool will be monitored for its usefulness and accuracy for rating GBV risk. For more information on the tool, refer to Annex 4.

Client led GBV Risk Assessment

Stakeholder Engagement

40. As described in ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle, and is important for managing the project's risks. Stakeholders[16] in the project adjoining communities need to understand project risks and benefits. Projects are required to develop a Stakeholder Engagement Plan (SEP) to be implemented over the life of the project to keep the local communities and other stakeholders informed about the project, and to enable continuous engagement with and feedback from affected communities. For Substantial and High risk projects, the SEP is recommended to include GBV specific considerations for how to appropriately conduct consultations (see below).

41. Technology can facilitate continual communication and exchange with communities, particularly to track perceptions of GBV risk as linked to a project. It can also be an asset in assisting the community with access to services and updated information related to GBV, including access to services. Refer to Annex 8 for further information on technology and how it is currently being used in some World Bank operations to monitor GBV risks.

42. Stakeholder guidance should be sought to identify existing and potential local GBV risks, and they should be consulted on potential interventions and risk mitigation measures. Consultations with those working with adolescent girls and boys and other at-risk groups, and women leaders should be prioritized to enable understanding of GBV risks and trends in the community.

43. Task Teams should carefully monitor that effective and inclusive community consultations are undertaken. The consultations are generally organized by the IA[17] with the support of the supervision consultant's safeguard specialists, although if the project's needs are very substantial, then an independent consultant to support the IA with consultations may be a more effective approach. **These consultations need to be continuous through the project life cycle, not just during preparation.**

44. To understand safe and ethical recommendations pertaining to GBV consultations, see the Ethics section of the Violence Against Women and Girls Resource Guide. Stakeholder consultations **should never directly ask about individual experiences of GBV**. Rather, they should focus on gaining an understanding of the experiences of women and girls in affected communities, including wellbeing, health and safety concerns. If any consultations are to take place with children, they must be carried out by a person trained in child consultations, with an understanding of local culture and customs. Before commencing with consultation, teams should be prepared with information related to those providing services to survivors in a community so anyone who discloses violence can be immediately referred. Taking into account these safety and ethical principles can prevent inadvertently causing harm when consulting with community members. Key considerations for the consultation process (see ESS10 for further details) are:

    - Identify the project adjoining communities and plan stakeholder consultations on this basis.
    - Undertake consultations in accordance with the Guidance Note on Stakeholder Consultations for Investment Projects. Community consultations should be conducted so that those affected by the project are properly informed, and to get their feedback on project design and safeguard issues.
    - Ensure consultation activities provide opportunities to share information with stakeholders on project-related risks and the proposed reporting and response measures. With a particular focus on women, children

[16] The stakeholders of a project will vary depending on the details of the project. They may include local communities, national and local authorities, neighboring projects, and nongovernmental organizations.

[17] Clients should consider hiring a GBV specialist to undertake consultations and key informant interviews related to GBV. This will ensure appropriate methodology and adherence to global ethical and safety standards.

and other at-risk groups—each of which may require different approaches to enable a safe space for discussion. Recognizing the gender power dynamics and social dynamics within a community and how they may inhibit participation, it is key to ensure that spaces are made available for women, men and children affected by the project to participate in consultations. It is important that the stakeholders be aware, at a minimum, of:

- The purpose, nature and scale of the project;
- The duration of the proposed project activities;
- Potential risks and impacts on local communities, and related to GBV:
  - The labor influx implications;
  - The ESHS and GBV, particularly SEA, risks that may be associated with the project;
  - The Employer's (i.e. Government) ESHS Policy as required in the World Bank's Standard Procurement Documents (SPDs);
  - The CoC standards to be used in the project (e.g. from the SPDs); and,
  - Who the local GBV Services Providers are, how to contact them, and the support services offered.
- The proposed stakeholder engagement process and how stakeholders can provide feedback on the project; and,
- The channels available to lodge complaints through the Grievance Redress Mechanism (GRM) and how they will be addressed.

45. It is also recommended that the IAs and the safeguards consultant consult with local organizations, women's groups, nongovernmental organizations (NGOs) and relevant multilaterals to:

- Understand the types of GBV that are present in the community and that may be exacerbated by the project; including identification of what groups of individuals are most vulnerable to harm; where women and girls feel most unsafe; how the community currently deals with GBV incidences; and why GBV may be exacerbated by the project;
- Map services and safe spaces available to survivors of GBV and spaces where GBV is currently reported;
- Identify measures to mitigate project risks; and,
- During GBV risk assessment activities there should be no attempt to contact survivors of GBV and question them about their GBV incident. [18]

Safeguard Documents

46. The **Environmental and Social Assessment (ESA)** identifies potential environmental and social impacts early on in project preparation and is usually the primary vehicle for assessing GBV risks on a major civil works project. The Borrower carries out an ESA of the project to assess the environmental and social risks of the project throughout the project life cycle. In areas of Substantial and High risk of GBV, as determined by GBV Risk Assessment Tool, the ESA should pay particular attention to identifying GBV risks. The consultants undertaking the ESA for such projects should ideally include a GBV specialist so that GBV challenges can be properly assessed and appropriate mitigation measures proposed. [19]

[18] See: (i) The Violence Against Women and Girls Resource Guide Ethics page; (ii) Ellsberg, M., and L. Heise. 2005. Researching Violence Against Women: A Practical Guide for Researchers and Activists. Washington DC, United States: World Health Organization, PATH; and (iii) World Health Organization. 2001. Putting women first: Ethical and safety recommendations for research on domestic violence against women; and (iv) World Health Organization. 2007. WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies. Geneva, Switzerland.

[19] A list of vetted GBV specialists can be found at the GBV thematic group webpage.

47. For ESAs to capture the socio-economic, cultural and risk context for women, they should consider:

- Existing gender country diagnostics/country action plans;
- Data on partner/non-partner physical violence against women[20];
- Data and/or information on cultural practices vis-à-vis women (early marriage, physical practices);
- Existing services available from GBV Services Providers;
- Where health centers are located and what types of services are offered (e.g., whether they treat sexually transmitted diseases, provide reproductive health services, have supplies of rape kits including post-exposure prophylactics and emergency contraception, etc.);
- Whether women have easy access to these services, and if they have mobility and/or economic constraints that may impede access; and,
- Information obtained from consultations carried out in the preparation of the project.

48. A robust assessment methodology for social risk assessments and analysis can help identify critical markers to address project related risk. Tools such as key informant interviews, observation, free listing, pair-wise ranking, timelines and seasonal calendars, causal flow analysis and open-ended stories have all been used in the field of GBV research. For more information on how to apply these tools safely and ethically see Chapter 9 of the manual: Researching Violence Against Women: A Practical Guide for Researchers and Activists.[21]

49. It is vital that the ESA adequately identify GBV Risks. The project **Environmental and Social Management Plan (ESMP)** will however define the specific ways that GBV risks are to be addressed in the project by identifying mitigation measures including the development of a GBV Action Plan. It is usually included as part of the tender package and thereby forms part of the construction contract, with the contractor using the project ESMP to create the contractor's ESMP (C-ESMP).[22] Annex 5 provides recommendations on the C-ESMP. Annex 5 describes the Project's ESMP and the C-ESMP in relation to GBV.

50. The project ESMP lays the first building block for addressing GBV, and particularly SEA and SH risks and should provide the appropriate umbrella framework for any proposed GBV mitigation measures, particularly those proposed in this GPN.

51. It is essential that project-level measures to address GBV risks consider other ongoing efforts to prevent and respond to GBV, and how the project will complement/use them. Project GBV interventions should be linked wherever possible with existing activities in the health sector, and other GBV Service Providers such as justice/security, psychosocial support and economic empowerment programming.

3.3 GBV Action Plan

52. For the project's GBV risks to be properly addressed, it is necessary to have an effective '**GBV Action Plan**', which outlines:

- How the project will put in place the necessary protocols and mechanisms to address the GBV risks; and,
- How to address any GBV incidents that may arise.

53. A GBV Action Plan is recommended for Moderate, Substantial and High risk projects but the activities outlined in the action plan will vary in accordance with risk: the higher the risk, the more will need be addressed through the

[20] These data are available in many Demographic and Health Surveys and are summarized as part of the Gender Sustainable Development Goals. These data exist for over 90 countries.

[21] An adequate methodology to employ in risk assessments is: Ellsberg M, and Heise L. (2005). Researching Violence Against Women: A Practical Guide for Researchers and Activists. Washington DC, United States: World Health Organization, PATH.

[22] Ideally, the ESMP's provisions should be included as part of the contract specifications, as this ensures that the requirements are put forward in a manner that contractors can understand and implement. However, since this is not always effectively done, including the ESMP as part of the bidding documents is the more common approach.

GBV Action Plan. It must be emphasized that the GBV Action Plan elements need to be customized for each project, local labor legislation and industrial agreements.

54. Ensuring that the project has an appropriate GBV Action Plan is the responsibility of the IA. The basis of the GBV Action Plan should be provided as part of the ESMP. The proposed approach on how to implement and monitor the GBV Action Plan including agreed sanctions for the Accountability and Response Framework and the CoC, should be provided by the contractor and consultants as part of the C-ESMP (See Annex 1 for a detailed example of a GBV Action Plan).

55. The GBV Action Plan needs to include specific **arrangements** for the project by which GBV risks will be addressed. This includes considerations such as:

- Awareness Raising Strategy, which describes how workers and local communities will be sensitized to GBV risks, and the worker's responsibilities under the CoC;
- GBV Services Providers to which GBV survivors will be referred, and the services which will be available; and,
- GBV **Allegation Procedures:** How the project will provide information to employees and the community on how to report cases of GBV CoC breaches to the GRM.

56. The **Accountability and Response Framework**, to be finalized with input from the contractor, should include at minimum:

- GBV Allegation Procedures to report GBV issues to service providers, and internally for case accountability procedures which should clearly lay out confidentiality requirements for dealing with cases; and,
- Response Framework which has:
    - Mechanisms to hold accountable alleged perpetrators associated to the project;
    - The GRM process for capturing disclosure of GBV; and,
    - A referral pathway to refer survivors to appropriate support services.

57. The 'Response Framework' outlines the disciplinary action for violation of the CoC by workers. **It is essential** that such actions be determined and carried out in a manner that is consistent with local labor legislation and applicable industrial agreements, otherwise there is risk that the CoC will not be implemented effectively. It is important to note that, for each case, disciplinary sanctions are intended to be part of a process that is entirely internal to the employer, is placed under the full control and responsibility of its managers and is conducted in accordance with the applicable national labor legislation and the individual worker's employment contract. It is key that the proposed sanctions will be in line with local law as these may prohibit certain types of disciplinary measures, including termination of employee.

58. The supervision consultant should monitor and report on the effectiveness of the implementation of the GBV Action Plan to prevent and mitigate GBV risks associated with the project. Reporting should be done on a monthly basis (see more on Reporting in **Table 2: Proposed Reporting of GBV During Implementation**).

3.4 Assessing Capacity to Respond to GBV

59. The capacity to respond to GBV is dependent on the ability of the project to provide access to safe and ethical services for survivors. GBV Services Provider(s) and/or community-based organizations are critical not only for supporting the project in addressing any case of GBV that may arise, but also in assisting the project to proactively prevent GBV cases.

60. Section 5.2 and Annex 6 provide recommendations on how to identify and work with GBV Services Providers. Where appropriate to select a GBV Services Provider to provide services (Substantial and High risk projects) teams should verify that the provider can offer services in accordance with international standards that articulate a minimum basic package of services, ideally including case management support, health services, psychosocial

support, police support and security, access to legal services, and shelter, if needed.[23] When identifying GBV Services Providers, the quality of service provision should be a key consideration.[24] To maximize access to all appropriate services applicable to a survivor of GBV, a service provider should be able to actively refer survivors to other service providers where needed to enable the survivor to get the range of services that will put the survivor on a path to recovery. In the majority of cases service providers offer one or two services, but not the whole range of services that may be applicable to a survivor's case. Documentation on how referrals should be made is often denoted as a referral pathway.

[23] For more information on services needed by GBV survivors see: http://www.vawgresourceguide.org/overview

[24] Quality standards for medical care can found at: http://www.who.int/reproductivehealth/publications/post-violence-care-in-health-facilities/en/ Other service standards can be found at:https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE.Minimum.Standards.Publication.FINAL_.ENG_.pdf

4 Addressing GBV Risks

4.1 GBV Risk Mitigation and Response Measures

61. Once Task Teams have assessed and established the level of GBV risk as described in Chapter 3, they will need to consider a series of mitigation measures to address and monitor these risks throughout the life of the project. **Table 1** provides a summary of actions proposed to mitigate GBV risks, based on the GBV risk and the phase of preparation or implementation of the project. **The level of effort associated with the mitigation measures in Table 1 will usually vary by risk.** For example, the design of the GRM may vary according to the GBV risk.

62. The response measures recommended in this note apply to projects currently under preparation as well as those which begin preparation following the issuance of this GPN.

63. For projects which do not use loan/credit/grant proceeds to hire GBV service providers at the start of project implementation, it is recommended that Borrowers include an escalation clause in the Environmental & Social Commitment Plan (ESCP) should GBV risks become apparent over the course of project implementation. Borrowers might commit, for example, to hire (additional) GBV service providers using loan/credit/grant proceeds should the presence of GBV create a need for additional support.

64. Sample TORs, CoCs, GBV Action Plans and other materials to support implementing the recommendations are available at: http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx

Table 1: Recommended Actions to Address GBV Risks in IPF Projects [25]

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
Identification/Appraisal	**Sensitize the IA** as to the importance of addressing GBV on the project, and the mechanisms that will be implemented.	• Preparation. • Implementation.	• Task Team.	• Task team to monitor and provide additional guidance as necessary.	✓	✓	✓	✓
	The **project's social assessment** to include assessment of the underlying GBV risks and social situation, using the GBV risk assessment tool to provide guidance and keeping to safety and ethical considerations related to GBV data collection. No prevalence data or baseline data should be collected as part of risk assessments.	• Preparation. • Implementation (before civil works commence). • PCN and QER/Decision Review (GBV Risk Assessment Tool).	• IA for social assessment and ESMP. Contractor for C-ESMP. • Task Team for GBV Risk Assessment Tool.	• Ongoing review during implementation support missions. • Update project ESMP and Contractor's ESMP (C-ESMP) if risk situation changes.	✓	✓	✓	✓
	Map out GBV prevention and response actors in project adjoining communities.[26] This should incorporate an assessment of the capabilities of the service providers to provide quality survivor centered services including GBV case management, acting as a victim advocate, providing referral services to link to other services not provided by the organization itself.	• Preparation • Implementation	• IA	• Update mapping as appropriate	✓	✓	✓	✓

[25] In the table ✓ = Actions are recommended given the risk level; ○ = Actions that should be considered to be done, and adopted if appropriate, given the nature of the project and the associated risks; ⊗ = Actions are unlikely needed given risk level.

[26] A mapping exercise of GBV prevention and response actors should ideally be undertaken at a country level and shared with all project teams.

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	Have GBV risks adequately reflected in all **safeguards instruments** (i.e., Project ESMP, C-ESMP)—particularly as part of the assessment in the ESA. Include the GBV mapping in these instruments.	• Preparation • Implementation (before civil works commence).	• IA for social assessment and ESMP. • Contractor for C-ESMP.	• Ongoing review during implementation support missions. Update project ESMP and Contractor's ESMP (C-ESMP) if risk situation changes.	✓	✓	✓	✓
	Develop a **GBV Action plan** including the **Accountability and Response Framework** as part of the ESMP. The contractor/consultant's response to these requirements will be required to be reflected in their C-ESMP.	• Preparation • Implementation (before civil works commence)	• IA	• Ongoing review during implementation	✗	✓	✓	✓
	Review the **IA's capacity** to prevent and respond to GBV as part of **Safeguard Preparation**.	• Preparation. • Implementation.	• Task Team	• Ongoing review during implementation support missions. Update project ESMP if risk situation changes.	✓	✓	✓	✓
	As part of the **project's stakeholder consultations, those affected by the project should be properly informed of GBV risks** and project activities to get their feedback on project design and safeguard issues. Consultations need to engage with a variety of stakeholders (political, cultural or religious leaders, health teams, local councils, social workers, women's organizations and groups working with children) and should occur at the start and continuously throughout the implementation of the project.	• Consultations need to be continuous throughout the project cycle, not just during preparation.	• IA.	• Monitoring of implementation of Stakeholder Engagement Plan. • Ongoing consultations, particularly when C-ESMP is updated.	✓	✓	✓	✓

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	The **Stakeholder Engagement Plan** of the project, which will be implemented over the life of the project to keep the local communities and other stakeholders informed about the project's activities, to specifically address GBV related issues**.**	• Consultations need to be continuous throughout the project cycle, not just during preparation.	• IA.	• Monitoring of implementation of Stakeholder Engagement Plan. • Ongoing consultations, particularly when C-ESMP is updated.	○	○	✓	✓
	Make certain the availability of an **effective grievance redress mechanism (GRM)** with multiple channels to initiate a complaint. It should have specific procedures for GBV including confidential reporting with safe and ethical documenting of GBV cases. Parallel GRM outside of the project GRM may be warranted for substantial to high risk situations.	Prior to contractor mobilizing.	IA, but discussed and agreed upon with the Task Team.	Ongoing monitoring and reporting on GRM to verify it is working as intended.	✓	✓	✓	✓
	Ensure **IA has a GBV specialist** to support project implementation.	Preparation.	IA.	Ongoing reporting.	✗	○	✓	✓
	For **supervision** have a **social /environmental specialist** in the supervision consultant's team with **GBV specific** skills to supervise issues related to GBV (e.g., supervise signing of Codes of Conduct (CoCs), verify working GRM for GBV is in place, refer cases where needed) and work with GBV Services Providers as entry points into service provision to raise awareness of the GRM.	During procurement evaluation process.	IA.	Ongoing reporting.	✗	○	✓	✓

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	Oversight through an independent **Third Party Monitor (TPM) organization/Independent Verification Agent (IVA)** (civil society organization, international or local NGO, academic partner, private sector firm) **with experienced GBV staff** for monitoring the implementation of the GBV Action Plan and ensuring all parties are meeting their responsibilities.	Preparation.	IA.	Ongoing reporting.	⊗	⊗	○	✓
	Funding must be available for IA to recruit GBV Services Providers to facilitate access to timely, safe and confidential services for survivors (including money for transportation, documentation fees, and lodging if needed).	Preparation	IA.	IA.	⊗	⊗	○	✓
	Projects which do not use loan/credit/grant proceeds to hire GBV service providers at the start of project implementation encourage Borrowers include an escalation clause in the Environmental & Social Commitment Plan (ESCP) should GBV risks become apparent over the course of the project implementation.	Preparation.	Task Team.	Task Team.	✓	✓	✓	✓
Procurement	Clearly define the GBV requirements and expectations in the **bid documents.**	Procurement.	IA.	Review by Task Team.	✓	✓	✓	✓
	Based on the project's needs, the Bank's Standard Procurement Documents (SPDs), and the IA's policies and goals, define the requirements to be included in the bidding documents for a **CoC which addresses GBV**.	Procurement.	IA.	Review by Task Team.	✓	✓	✓	✓

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	For **National Competitive Bidding (NCB) procurement,** consider integrating the ICB SPD requirements for addressing GBV risks.	Procurement.	IA.	IA with review by Task Team.	○	○	✓	✓
	The procurement documents should set out clearly how adequate GBV costs will be paid for in the contract. This could be, for example, by including: (i) line items in bill of quantities for clearly defined GBV activities (such as preparation of relevant plans) or (ii) specified provisional sums for activities that cannot be defined in advance (such as for implementation of relevant plan/s, engaging GBV service providers, if necessary)	Procurement.	IA.	Review by Task Team.	✓	✓	✓	✓
	Clearly explain and define the requirements of the bidders **CoC** to bidders before submission of the bids.	Procurement.	IA.	Review by Task Team.	✓	✓	✓	✓
	Evaluate the contractor's GBV response proposal in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's GBV requirements	Procurement.	IA.	Review by Task Team.	✗	✓	✓	✓
Implementation	**Review C-ESMP** to verify that appropriate mitigation actions are included.	• Implementation.	• IA.	• Review by IA. • Review by Task Team.	✓	✓	✓	✓
	Review that the GRM receives and processes complaints to ensure that the protocols are being followed in a timely manner, referring complaints to an established mechanism to review and address GBV complaints.	• Implementation.	• Task Team. • IA	• Ongoing reporting. • Monitoring of complaints and their resolution.	✓	✓	✓	✓

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	Codes of Conduct signed and understood • Ensure requirements in CoCs are clearly understood by those signing. • Have CoCs signed by all those with a physical presence at the project site. • Train project-related staff on the behavior obligations under the CoCs. • Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities.	• Initiated prior to contractor mobilization and continued during implementation.	Contractor, Consultant, IA.	• Review of GBV risks during project supervision (e.g., Mid-term Review) to assess any changes in risk. • Supervision consultant reporting that CoCs are signed and that workers have been trained and understand their obligations.[27] • Monitoring of GRM for GBV complaints. • Discussion at public consultations.	✓	✓	✓	✓
	Have project workers and local community undergo **training** on SEA and SH.	• Implementation.	• IA, Contractors, Consultants	• Ongoing reporting.	✓	✓	✓	✓
	Undertake regular **M&E** of progress on GBV activities, including reassessment of risks as appropriate.	• Implementation.	• IA, Contractors, Consultants.	• Monitoring of GRM. • Ongoing reporting.	✓	✓	✓	✓

[27] Civil works supervision consultant's monthly reports should confirm all persons with physical presence at the project site have signed a CoC and been trained.

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	Implement appropriate **project-level activities** to reduce GBV risks prior to civil works commencing such as: • **Have separate, safe and easily accessible facilities for women and men working on the site**. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. • **Visibly display signs around the project site** (if applicable) that signal to workers and the community that the project site is an area where GBV is prohibited. • As appropriate, public spaces around the project grounds should be **well-lit.**	• Prior to works commencing.	Contractor/ Supervision Consultant • Task Team.	• Ongoing reporting. • Reviews during implementation support missions.	○	✓	✓	✓

4.2 Addressing GBV risks through the Procurement Process

65. Embedding GBV requirements in procurement processes is a critical mechanism for ensuring legal accountability for addressing GBV in projects. Recent revisions to World Bank procurement requirements have strengthened measures to address GBV risks on World Bank-financed operations. SPDs and Standard Bidding Documents (SBDs), which the Borrower agrees to apply for international competitive procurement, provide the basis for ensuring that contractors and consultants fulfil the GBV obligations.

Bidding (Procurement) Documents

66. It is important that the bidding documents sufficiently reflect the findings of any ESA, and the requirements of the ESMP for addressing GBV and overall ESHS risks. The Bank's SPDs and SBDs (works-related and for supervision consultants) provide the framework and contain explanations and notes for including GBV-related provisions within the procurement documents, for example, through appropriate specifications in the Employer's requirements/TOR.

67. It is essential that the Task Teams ensure that the bidding documents clearly define the project's GBV-related requirements through the specifications and employer's requirements. Key considerations include:

- The bidding document to be used are recommended to be reviewed to confirm that potential risks of GBV are adequately addressed given the nature of the project. This is particularly important when it is anticipated that:
  - The project will result in major labor influx; or,
  - National Competitive Bidding (NCB) will be used where the country's NCB documents do not adequately address GBV and ESHS risks.[28]
- High risk projects are recommended to include the requirement that bidders submit not only a CoC, but also a Labor Influx Management Plan for the proper management of the workers on the project.
- Specifications (ideally) and/or the Particular Conditions to the Contract should be used to adequately address GBV risks and more broadly improve ESHS performance. Guidance on how to do this is contained in Procurement Guidance- Environmental, Social, Health and Safety in Procurement.
- The project ESMP and other safeguard documents should fully describe the GBV risk (including a GBV Action Plan), and more broadly the ESHS expectations, and include appropriate mitigation measures. This should be transcribed into the specification in accordance with the guidance contained in the Procurement Guidance- Environmental, Social, Health and Safety in Procurement.
- As described in further detail in the SPD (Works SPD PCC 4.1), the Bidding document should include a requirement that the Contractor shall not carry out any Works, including mobilization and/or pre-construction, unless the Engineer is satisfied that appropriate measures are in place to address environmental, social, health and safety risks and impacts. At a minimum, the Contractor shall be required to apply the Management Strategies and Implementation Plans and CoC, submitted as part of the Bid and agreed as part of the Contract. Guidance for how to do this for procurements that don't use SPDs is included in the Procurement Guidance- Environmental, Social, Health and Safety in Procurement.

68. Careful consideration needs to be given for how the costs for the contractor to implement the GBV requirements will be treated in the bid, evaluated, and paid as such. The project budget should be realistic about these costs. One option to consider is the use of a provisional sum which would see contractors paid for reasonable costs of

[28] As part of the decision to use National Procurement Procedures, an assessment of the national procurement documents should be undertaken to establish how and where provisions in respect to GBV should be included. The Bank's Task Team (including procurement, safeguards specialists) should work with the Borrower to identify the best mechanism for incorporating the necessary requirements. Should this process prove to be impractical for the project (e.g. requires lengthy clearances by multiple levels of authorities), an alternative interim approach would be to have the Borrower adopt a minimum CoC for all bidders to follow, which reflects the necessary ESHS and GBV requirements. Annex 1 describes how this was done in the Pacific Islands.

implementing the GBV Action Plan. The advantage of this approach is that all bidders will then have a consistent level of funding in their bids, neutralizing the implications of underpricing or overpricing.

During Bidding

69. It is essential to draw the attention of bidders to specific GBV requirements on the project. This can be done for example through market engagement (during the development of the Project Procurement Strategy for Development), use of clarifications, and/or during any pre-bid meetings. Details on how to do this are provided in the SPDs and the Procurement Guidance - Environmental, Social, Health and Safety in Procurement. It is recommended to be as clear as possible regarding the form and nature of the known GBV risks during this process, as well as the measures that bidders will need to take. The key information to provide bidders includes:

    - The ESMP requirements, particularly with regard to ESHS expectations, and GBV requirements (including a response to the GBV action plan);
    - That civil works will not commence until the C-ESMP has been approved by the IA or the supervision consultant;[29] and,
    - That the C-ESMP—including the GBV Action Plan—may be disclosed on the IA's web site,[30] and that the contractor should participate in public consultations at its own expense.

Bid Evaluation

70. The specifications or ESMP in bidding documents must include the requirements to respond to particular GBV risks or predicted impacts. As part of the contractor's Social Management Plan, which should be submitted with the bid, they should include details on:

    - Their proposed approach to implementing the GBV Action Plan including the Accountability and Response Framework (in response to the requirements outlined in the ESMP);
    - Their Codes of Conduct; and,
    - Other activities to address the GBV risks on the project (e.g. Labor Influx Management plan).

71. This information is to be assessed by the Borrower as part of the bid's responsiveness. Where the deviations or omissions are not assessed to be material—which would lead to the bid being rejected—the Borrower may request the bidder to provide clarifications and/or additional information, for further evaluation.

72. In procurement processes that include rated criteria or a points system, GBV requirements may be part of the proposal scoring system. Where this is used, the Task Team should ensure that the requirements are specific and clear, and that the allocation of points relative to other factors is balanced.

73. Bidders are required to submit a declaration of whether they have had a contract terminated, suspended or a performance security called for reasons relating to past poor performance on ESHS issues. The declaration includes details of the reasons. If it is established that the cause is due to GBV, due diligence should be carried out by the IA to determine whether bidders have learned from past experience and how they have modified or implemented management controls to prevent recurrence. In the absence of the bidder demonstrating appropriate controls to

[29] For complicated or lengthy projects, it may be acceptable to have a "phased" C-ESMP. This means the C-ESMP would be approved in phases, reflecting the order in which civil works are done. For example, if a five-year project to construct an expressway only has asphalt paving in year four, then there is no need to have the asphalt plant's environmental requirements included in the initial C-ESMP, which would instead focus on initial activities such as project mobilization and earthworks.

[30] This is not a World Bank requirement, but experience has shown that it is beneficial to the project engaging local communities as they are well informed of the specific project construction activities which may affect them. While ESMPs are disclosed through the World Bank's external website, C-ESMPs should not be disclosed through the external website as they do not require a World Bank "no objection." Their disclosure is recommended only to be on the IAs website.

prevent recurrence, the Task Team should review the IA's assessment and recommendation on next steps and consult with the IA as necessary as to how to ensure appropriate controls are in place.

4.3 Codes of Conduct

74. Since 2017, the World Bank's SPDs for civil works and supervision consultants procured under International Competitive Bidding (ICB) have required that workers sign a CoC as a first line mitigation measure (see Annex 1). A CoC clarifies an organization's mission, values and principles, linking them with standards of professional conduct.[31] The CoC articulates the values the organization wishes to foster in leaders and employees and, in doing so, defines desired behavior. As a result, a written CoC can become a benchmark against which individual and organizational performance can be measured. **The SPD requirements for CoCs include provisions for addressing GBV, particularly SEA, and include prohibitions against sexual activity with anyone under the age of 18. Mistaken belief regarding the age of the child and consent is not a defense for engaging in sexual activity with minors.**

75. As noted earlier, the CoC is associated with a GBV Action Plan, which includes an 'Accountability and Response Framework' that outlines how complaints will be handled, in what timeframe, and the range of possible consequences for perpetrators of GBV so that the CoC can be implemented effectively (see Annex 1).

76. The World Bank has not endorsed a 'template' CoC for projects. The SPDs provide guidance on the minimum content of issues to be addressed in the CoC. Bidders are also required to describe the implementation arrangements for the CoC. As noted in Annex 1, some projects in low-capacity environments have worked with IAs to develop the IA's CoC, which is used as the minimum standard acceptable from bidders in their submissions. This IA CoC may be used by bidders should they not have one of their own. The GBV Thematic group has compiled sample CoCs from multiple organizations from around the world that may be used as reference documents when CoCs are being prepared by IAs or where CoCs of contractors are evaluated.

77. A key element of the CoC will be the sanctions that may be applied if an employee is confirmed as a GBV perpetrator. The sanctions need to be proportional to the transgression. Prior to imposition of sanctions, if a worker raises a credible challenge to alleged non-compliance with the CoC, the worker's employer should place the worker on administrative leave pending a full and fair review to determine the veracity of said allegation(s). An example of potential sanctions based on the Pacific Island transport projects include the following:

- Informal warning;
- Formal warning;
- Additional training;
- Loss of up to one week's salary;
- Suspension of employment (either administrative leave as above or without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;
- Termination of employment; and/or,
- Referral to the police or other authorities as warranted.

4.4 Contractor's ESMP

78. As noted in Section 3, the client's safeguard documents should identify the risk of GBV and propose mitigation measures—particularly through the project ESMP. The project **ESMP is usually the foundation for the C-ESMP**, which is the plan prepared by the contractor outlining specifically how it will implement the civil works activities in accordance with the project ESMP's requirements and with the contract.[32] The C-ESMP, therefore, is a fundamental instrument for ensuring oversight and management of GBV risks.

[31] http://www.ethics.org/resources/free-toolkit/code-of-conduct.

[32] As part of the bid, the Contractor submits Management Strategies, Implementation Plans, and a CoC. The Contractor also submits, on a continuing basis, for the Engineer's prior approval, such supplementary Management Strategies and Implementation Plans as are

79. Annex 5 shows how an effective C-ESMP is essential for addressing GBV risks during implementation. Contractually, the contractor must follow the C-ESMP, which is why it is important that the C-ESMP build upon the findings and proposed measures identified in the project's ESA and ESMP. For the few IPF with infrastructure investments that lack ESMPs and C-ESMPs, an alternative modality would need to be found.

80. Public disclosure and consultations on the C-ESMP—particularly with regard to GBV risk mitigation—is beneficial (but not mandatory) as it ensures that local communities are aware of the specific actions proposed to address the risks. Ideally, the works contract should require the contractor to participate in the consultations at its own expense, since they are related to the project works.

4.5 GBV Training for Contractors, Consultants and Clients

81. To properly address GBV, the training and sensitizing of workers is essential. These workers include civil works contractors (including sub-contractors and suppliers), supervision consultants, other consultants who may have a presence in the project adjoining communities—as well as the IAs. Projects can seek to embed training modules that incorporate GBV into the regular Occupational Health and Safety (OHS) 'toolbox' meetings with workers, official training and/or standalone training efforts. Linking the curriculum to actors outside the project such as health and education sector professionals may also be beneficial. Training on GBV should be thorough and proportional to the GBV risk. The modality, frequency and content of the training should be detailed in the GBV Action Plan.

82. At a minimum, training should include:

- What GBV, particularly SEA and SH, is and how the project can exacerbate GBV risks;
- Roles and responsibilities of actors involved in the project (the standards of conduct for project-related staff captured in CoCs);
- GBV incident reporting mechanism, accountability structures, and referral procedures within agencies and for community members to report cases related to project staff;
- Services available for survivors of GBV; and,
- Follow-up activities to reinforce training content.

83. Training and awareness raising is a strong step toward behavior change. As projects are implemented, training on GBV should be made available to the project-affected communities so they can learn about the roles and responsibilities of actors involved in the project, processes for reporting incidents of project-related GBV, and the corresponding accountability structures. Training of both project-affected communities and project implementers allows all stakeholders to understand the risks of GBV, as well as appropriate mitigation and response measures, putting everyone on the same page.

84. Training IAs will also help to better understand the potential for GBV that can be exacerbated in the context of a project. An example of training conducted by the World Bank with clients in Uganda, as well as other recommendations on training and examples from several projects, can be found in Annex 9.

4.6 Grievance Redress Mechanisms

85. All World Bank financed IPF are required to have a GRM. To properly address GBV risks, the GRM needs to be in place prior to contractors mobilizing. While many projects have traditionally only considered GRM in the context of resettlement, as described in Annex 7, the World Bank's ESF requires that IPF have a "grievance mechanism that will be proportionate to the risks and impacts of the project". This is **meant to apply to all aspects of the project**.[33] Any parallel GRMs operated by contractors and consultants should include processes to refer complaints to the project GRM so as to ensure that an accurate understanding of the project's complaints is always available.

necessary to manage the ESHS risks and impacts of ongoing works. These Management Strategies and Implementation Plans collectively comprise the C-ESMP.

[33] ESS 10 notes that the same GRM can be used land acquisition and resettlement (ESS5) and Indigenous Peoples (ESS7), but recommends a separate one for project workers under ESS2.

86. For GBV—and particularly SEA and SH—complaints, there are risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. The GRM therefore needs to have multiple channels through which complaints can be registered in a safe and confidential manner (see Annex 7). Specific GRM considerations for addressing GBV are:

- The GRM is usually operated by the IA, or the PMU on the IA's behalf. When there are Substantial or High GBV risk projects, consideration should be given to a separate GBV GRM system, potentially run by a GBV Services Provider—with feedback to the project GRM similar to that for parallel GRMs by contractors and consultants. Annex 7 provides additional discussion on the pros and cons of addressing GBV through the overall project GRM system as opposed to an independent parallel GBV GRM. The GRM operators are to be trained on how to collect GBV cases confidentially and empathetically (with no judgement). See Annex 2 for further details.
- Projects must have multiple complaint channels, and these must be trusted by those who need to use them. Community consultations may be one mechanism to identify effective channels (e.g. local community organizations, health providers, etc.).
- No identifiable information on the survivor should be stored in the GRM.
- The GRM should **not** ask for, or record, information on more than three aspects related to the GBV incident:
  - The nature of the complaint (what the complainant says in her/his own words without direct questioning);
  - If, to the best of their knowledge, the perpetrator was associated with the project; and,
  - If possible, the age and sex of the survivor.
- The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor. This will be possible because a list of service providers will already be available before project work commences as part of the mapping exercise.
- The information in the GRM must be confidential—especially when related to the identity of the complainant. For GBV, the GRM should primarily serve to: (i) **refer** complainants to the GBV Services Provider; and (ii) **record** resolution of the complaint (see Chapter 5).

87. **Data Sharing:** The GBV Services Provider will have its own case management process which will be used to gather the necessary detailed data to support the complainant and facilitate resolution of the case referred by the GRM operator. The GBV Services Provider should enter into an information sharing protocol with the GRM Operator to close the case. This information should not go beyond the resolution of the incident, the date the incident was resolved, and that the case is closed as described in Chapter 5. Service providers are under no obligation to provide case data to anyone without the survivor's consent. If the survivor consents to case data being shared the service provider can share information when and if doing so is safe, meaning the sharing of data will not put the survivor or service provider at risk for experiencing more violence. For more information on GBV data sharing see: http://www.gbvims.com/gbvims-tools/isp/.

88. The costs of operating the GRM are usually modest and should be financed by the project as part of the general project management costs.[34]

89. The GRM should have in place processes to immediately notify both the IA and the World Bank of any GBV complaints with the consent of the survivor. For World Bank reporting protocol refer to the Safeguards Incident Response Toolkit.

[34] The operation of the GRM does not include the cost of resolving GBV complaints (e.g. survivor support services), which, depending on the risk level and the mechanism in place, may be more costly.

4.7 Monitoring and Reporting

90. It is essential that the project monitor GBV activities. M&E plays a key role in assessing the effectiveness of mitigation measures. As part of the M&E process, indicators need be selected for inclusion in the project Results Framework.

Results Framework Indicators

91. The project's Results Framework should include indicators related to: (i) the GBV activities on the project; and, (ii) the GRM.

92. GBV indicators may include:

- Successful implementation of agreed GBV Action Plan (Y/N);
- Number of training courses related to GBV delivered;
- Percentage of workers that have signed a CoC; and/or,
- Percentage of workers that have attended the CoC training.

93. **GRM indicators:** To measure the effectiveness of the GRM, the publication of statistics on complaint resolution in accordance with IDA recommendations on Citizen Engagement should be followed. In addition, the following indicator could be considered to measure the effectiveness of the GRM addressing GBV-related complaints "Number of GBV grievances that have been referred to GBV Services Providers."[35] An additional indicator which is useful to monitor is the time it took to resolve the GBV-related complaint. Reporting During Implementation

94. Projects have a significant role to play in supporting safe spaces for women and children to report their experiences of violence. It should be noted that increases in the number of reported cases does not necessarily mean that GBV incidents have increased but likely reflects improved mechanisms for safe and confidential reporting and increased interest in accessing GBV support services. **Table 2** proposes the reporting mechanisms for GBV monitoring. It should be emphasized that any reporting should have no identifiable information on individual cases. It is essential that the confidentiality and safety of GBV survivors is protected.

[35] This is not one of the recommended "Citizen Engagement" indicators as per the Guidance Note on Results Framework and Monitoring & Evaluation, but is an important GRM indicator with regard to monitoring GBV in the project and identifying any changes to the project's GBV risk profile.

Table 2: Proposed Reporting of GBV During Implementation

Who	To Whom	What	When	Objective
GRM Operator	IA (and IA to furnish to WB)	• Reporting of GBV incidents with three key data: o Nature of the case; o Project related (Y/N); and, o Age and/or Sex (if available).	As soon as becomes known	For IA to monitor response. For WB to report to management in accordance with SIRT .
GBV Services Provider (Contracted to project)	IA and Supervision consultant	Aggregate data on case load: • Number of GBV cases referred by the GRM, disaggregated by adult/children and by sex; • The number of cases open, and the average time they have been open; and, • The number of cases closed, and the average time they were open.	Monthly	To ensure accountability of GBV service provider particularly if financial support is being provided for survivor support.
Supervision Consultant	IA	• Status on the implementation of project's GBV Action Plan; • The agreed project GBV indicators e.g.: o Successful implementation of agreed GBV Action Plan (Y/N); o Number of training courses related to GBV delivered; o Percentage of workers that have signed a CoC; and/or o Percentage of workers that have attended the CoC training. • That the GRM is functioning correctly for receiving and resolving complaints • The GRM indicators; and, • That an appropriate mechanism to resolve GBV complaints is established and functional.	Monthly	Part of overall supervision engineer's duty to monitor day-to-day activities and implementation of project's CoC.
Implementing Agency	WB	• Project GBV indicators; and, • GRM indicators (as supplied by the Supervision Consultant)	In accordance with project legal agreements	In accordance with the standard Practice Results Framework Reporting.
TPM Organization (if applicable)	IA (and IA to furnish to WB)	• The implementation of the GBV Action Plan; • The functioning of an appropriate mechanism to address and resolve GBV complaints; • The functioning of the GBV Services Provider; and, • The functioning of GRM and the status of GRM indicators related to GBV.	Quarterly	Part of overall TPM Organization's duty to monitor implementation of CoC.

95. **Aide Memoires:** Aide Memoires should include the data provided by the IA through the supervision consultant as well as any information from the TPM/IVA.

96. **Implementation Status Reports (ISRs):** The ISRs should include updates on the status of the GBV activities on the project, as well as to the indicators in the Results Framework.

4.8 Stakeholder Engagement

97. As noted in Chapter 3, consultations with local communities in the project's adjoining communities **need to be continuous throughout the project life.** These regular consultations should provide opportunities to share information with communities on project-related risks and reporting and response measures, and to identify any issues that may be arising with regard to GBV. This means the consultations should have a particular focus on women, children and other at-risk groups—each of which may require different approaches to enable a safe space for discussion.

4.9 Supervision and Oversight

98. Contractors on civil works projects are typically supervised by a consulting firm on behalf of the IA. A key challenge faced by many projects is that the supervision and oversight of GBV activities during civil works is inadequate. This section outlines activities that can be incorporated into the project to make supervision and oversight more proactive.

Supervision Modalities

99. Effective supervision and oversight of the project's GBV prevention and mitigation efforts is vital, and should therefore be carefully considered during project preparation. As shown in **Figure 5**, effective oversight requires various actors with additional ones needed in higher risk projects. All entities involved—supervision consultants, the IA, any independent oversight entities, as well as other entities such as steering committees and civil society—must have clear roles and responsibilities throughout the implementation of the project. All those involved in GBV activities should have appropriate training and skills for the tasks assigned to them.

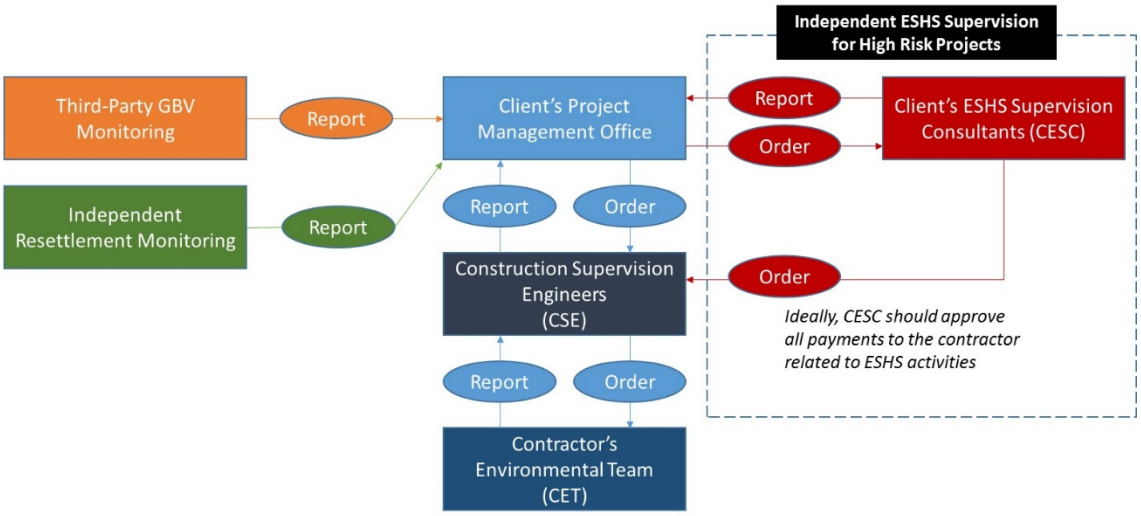

Figure 5. Supervision and Oversight Options for High Risk Projects Based on China Hubei Yiba Highway Project

Supervision Consultants

100. The TOR for the supervision consultants need to clearly outline the expectations of their role in ensuring that GBV risks and mitigation measures are properly reflected in the C-ESMP and are implemented. It is critical that the supervision consultant has appropriately qualified social and environmental specialists. In addition, for Moderate, Substantial and High risk projects, the consultants need to demonstrate that they have the appropriate capacity to take on GBV related responsibilities, such as supervising the signing of CoC, verifying that a working GRM for GBV is in place so that referral of GBV cases can be made when needed, and work with GBV Services Providers and

entry points into service provision (as required) to raise awareness of the GRM. They also have a role in the resolution of GBV complaints made to the GRM, not only for the project but also for ensuring any sanctions on their own staff are applied.

101. For projects with Substantial and High risk of GBV, it is prudent to require quarterly inspections to monitor the implementation of GBV mitigation measures. The inspections are recommended to include: (i) the supervision consultant's resident engineer, who is the one tasked with day-to-day oversight of the contractor; (ii) the supervision consultant's GBV specialist; and, (iii) the IAs GBV specialist. The presence of the IA's GBV specialists—who may be the project's social specialists—will assist the resident engineer in meeting the necessary GBV standards, and all the specialists to verify that project safeguard reports adequately reflect the actual situation with regard to mitigating GBV risks.

Implementing Agency Staffing

102. It is recommended that the IA have appropriate environmental and social specialists available. Without them, it will be very difficult to manage the project's ESHS risks—especially related to GBV. For projects at Substantial or High risk of GBV, it is recommended for the IA to have a GBV specialist as part of the safeguard team to ensure GBV-related activities and services are being delivered according to global quality and ethical guidelines.

Independent Monitoring of GBV

103. If there is a high risk of GBV in a project, **independent third-party GBV monitoring (TPM) is recommended**. The TPM or IVA is an organization commissioned to independently monitor and report on the effectiveness of GBV Action Plan implementation to prevent and mitigate GBV risks associated with the project[36]. The role of the TPM/IVA **is not to track, investigate or follow up on individual cases of GBV**—that is the role of the GBV Services Provider, which also ensures confidentiality for the survivor. The TPM/IVA has a higher-level oversight function to confirm that all project actors, including the GBV Services Provider and the designated focal points or committee to address and resolve GBV complaints, are implementing the GBV Action Plan. The TPM/IVA verifies that the provisions to prevent and respond to GBV are in place and functioning, and also can provide early warning of problems that may surface.

104. The selection of the TPM/IVA should be based on the project context, scope and reality on the ground and may be a civil society organization, international or local NGO, academic partner, private sector firm or dispute board mechanism. The TPM/IVA will be required to have experience in GBV so that part of the monitoring can be used to evaluate the quality of the actions undertaken. They should provide regular reports (minimum quarterly) directly to the IA, who should remit them to the Task Team.

[36] TPM typically involves verification of outputs by an entity paid from a source of funding that is external to the project or program's direct beneficiary chain or management structure, whereas IVA play a similar verification role but can be contracted using project funding. Many refer to IVA as TPM, including the 2017 GBV Task Force Report.

5. Responding to GBV Incidents

5.1 A Survivor-Centered Approach

105. Global best practice recognizes that it is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs and wishes are prioritized in every decision related to the incident. The survivor of GBV, particularly SEA and SH, who has the courage to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's informed consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor.

106. **Confidentiality** is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.

107. If the alleged perpetrator is an employee of the contractor, consultant or IA, to protect the safety of the survivor, and the workplace in general, the IA, contractor or consultant, in consultation with the survivor—and with the support of the GBV Services Provider—should assess the risk of ongoing abuse to the survivor and in the workplace. Reasonable adjustments should be made to the alleged perpetrator's or survivor's work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary. The employer should provide adequate leave to survivors seeking services after experiencing violence.

5.2 GBV Services Providers

108. As noted in Chapter 3 and Annex 6, one of the most effective ways of addressing GBV risks and incidences lies in working with GBV Services Provider(s) and community-based organizations that are able to support the project in addressing any case of GBV that may be project related, while also working to proactively prevent such cases.

109. **Identifying GBV Service Providers:** All projects are recommended to identify GBV Services Provider(s)—prior to project Appraisal—irrespective of the risk level. This is because GBV incidents may arise on any project and it is necessary to have the appropriate response mechanisms in place. Mapping of GBV prevention and response actors in a given community may already exist, particularly in humanitarian settings. Where no or insufficient local knowledge on prevention and response service providers is available, ideally the Country Management Unit (CMU) should undertake a mapping exercise through a portfolio approach that identifies qualified GBV Services Providers, NGOs and community-based organizations in the project's adjoining communities. In the absence of this, Task Teams can also undertake the exercise. In all cases mapping of GBV service providers should be verified during project preparation as funding for GBV services provision is scarce and can shift the service provision landscape in a matter of months. If no such organization exists in the project area, service providers from other areas (national or international) that meet international standards are recommended. Alternatively, if this is not possible, the Task Team, in consultation with the necessary GBV and/or health specialists, should evaluate whether there is a possibility in the project to finance a capacity development program to provide appropriate GBV support. This has to be carefully planned and considered.[37]

110. **Financing GBV Services Providers:** In High or Substantial risk projects in remote areas, where existing arrangements are not already in place to cover the costs of GBV Service Providers, it may be prudent to have the IA contract with one or more GBV Services Provider to provide specific services (typically using loan/credit/grant proceeds). This will make it easier to ensure that any survivors receive the necessary support. **No monetary compensation should be given directly to the survivor; all support services and accompanying transportation, housing and support requirements (money for official documentation or collection of forensic evidence) are paid through the service provider.**

111. If financed through the project, the GBV Services Provider should document the level of support given to a survivor, including referral to other service providers. Beyond unidentifiable aggregate key data points (e.g. nature of case, related to project and if available age and gender) case data should never be requested of service providers. In the exceptional situation where Service Providers need to share any more detailed with an outside party this must

[37] An example of this is the Tuvalu Aviation Investment Project, where an activity was included under the third Additional Finance to establish support services for survivors of GBV as such services were unavailable in Tuvalu. This saw the Fiji Women's Crisis Centre undertake training and capacity building activities financed by the project.

be with the permission of the survivor. The survivor must give consent to data sharing and know what data will be shared, with whom and for what purposes. For more information on GBV information sharing see: http://www.gbvims.com/gbvims-tools/isp/.

112. It is important that the GBV Services Provider understands their legal obligations, the legal limits of confidentiality, as well as their professional codes of practice, particularly when it comes to reporting GBV cases to the police. The WHO does not recommend mandatory reporting of GBV to the police[38] but if a country's legislation requires mandatory reporting, the GBV Services Provider should inform the IA and the potential survivor of this obligation, as well as of any other limits of confidentiality.

5.3 Handling GBV Complaints

113. All projects need to have a framework for properly handling GBV allegations. There are at least three key actors involved in handling GBV allegations: (i) the GRM operator; (ii) the GBV Services Provider and, (iii) the representative of the IA. It is therefore essential that prior to GBV complaints being received, all projects clearly identify who specifically will be responsible for handling the complaint: who will assess the nature of the complaint, the appropriate sanction to be applied to the perpetrator, verifying that the survivor has received support, and the sanctions have been enacted, etc. Teams should note that existing modalities for reporting complaints may not be appropriate to enable reporting or to handle the sensitivities associated with GBV. Teams may therefore need to identify alternate channels for reporting, such as the GBV Services Provider.

114. The IA should establish an accountability and response mechanism for resolving GBV cases. Whilst the process for the resolution and the people involved may vary, the key guiding principle for the resolution process should be to ensure the complete confidentiality of the survivor, a survivor centered approach, a speedy resolution and that the process outlined in the agreed upon 'Accountability and Response Framework' is applied. Any person involved in the resolution process should be specifically trained to address and resolve GBV related complaints and where ever possible a dedicated focal point from the GBV Services Provider should be part of the resolution process. An example of a resolution mechanism applied in the Vanuatu Aviation Investment Project (VAIP) can be found in Annex 7.

115. The process for addressing complaints would typically be along the following lines (see Annex 7):

- The GRM operator will keep GBV allegation reports confidential and, unless the complaint was received through the GBV Services Provider or other identified reporting channels, refer the survivor immediately to the GBV Services Provider.[39]
- If a case is first received by the GBV Services Provider or through other identified reporting channels, the report will be sent to the GBV operator to ensure it is recorded in the system.
- The GBV Services Provider provides the necessary support to the survivor until it is no longer needed (see Section 5.4).
- If requested by the IA, a survivor's representative from the GBV Service Provider will participate in the GBV resolution mechanism, including referral to the police if necessary. The survivor must give the service provider representative consent to participate in the GBV resolution mechanism on her/his behalf.
- As part of the established resolution mechanism GBV allegations are considered and agreement is reached on a plan for resolution as well as the appropriate remedy for the perpetrator, all within the shortest timeframe possible to avoid further trauma to the survivor.

[38] For further information see the WHO Responding to intimate partner violence and sexual violence against women WHO clinical and policy guidelines (2013).

[39] Survivors of GBV may need access to police, justice, health, psychosocial, safe shelter and livelihood services to begin healing from their experience of violence. This will be arranged by the GBV Services Provider on their behalf in accordance with the survivor's wishes (see Section 5.1).

- In consultation with the GBV Services Provider, the appropriate representative from the IA is tasked with implementing the agreed upon plan which should always be in accordance with local legislation, the employment contract, and CoC.
- Through the GBV Services Provider, the GBV complaints resolution mechanism advises the GRM operator that the case has been resolved, and it will then be closed in the GRM.
- The IA and the World Bank will be notified that the case is closed.

116. As noted earlier, the Services Provider, and IA representatives involved in the GBV case resolution, need to understand their legal obligations when it comes to reporting GBV cases to the police. Reporting should be done in accordance with the law, especially in cases that require mandatory reporting of certain types of GBV incidents, such as sexual abuse of a minor. When there is no legal obligation to report the case according to the local law, survivors hold the decision of whether to report cases to the GRM for resolution and other service providers and reporting of a case to anyone can only be made with the consent of the survivor.

5.4 Ensuring Appropriate Support for Survivors

117. The support provided to survivors through GBV Services Providers should include: (i) health; (ii) psycho-social; and, (iii) legal support. Services should follow global standards and guidelines.[40]

118. Any survivor reporting GBV through a reporting mechanism in a World Bank-financed IPF should receive care regardless of whether the perpetrator is known to be associated with the project or not. This is because:

- Often, the specifics of the perpetrator may not be known at the time that support services start, and once started, a survivor should be able to continue to access care.
- The increased GBV sensitization activities linked to Bank-financed projects in the project's adjoining communities may lead survivors in communities to seek services through the project, regardless of whether the perpetrator was linked to the project or not.[41]

119. With regard to the support given to the survivor from the GBV Services Provider, under the survivor-centered approach the case is only closed when the survivor no longer requires support.

5.5 Reporting to Management

120. The World Bank has recently introduced the 'Safeguards Incident Response Toolkit' (SIRT) to outline procedures for World Bank Staff to report negative safeguard incidents in an IPF. SIRT outlines the requirements for reporting GBV cases and has a protocol that defines incidents using three categories. "Indicative" events are addressed within the Task Team with notification to the Practice Manager and Regional Safeguards Coordinator (RSC). "Serious" events need to be elevated by the TTL to the Country Manager/Director, Global Practice Manager, Social and Environmental Practice Managers and Directors, Relevant Program Leaders, Legal, External and Corporate Relations (ECR), RSC Regional Safeguards Advisor, and Chief Environmental and Social Standards Officer (CESSO). (see SIRT Figure 2 – Event Communication Chart). Finally, in a "Severe" event, the TTL promptly notifies the CMU (Country Manager/Country Director). The CD informs the RVP, SD VP and/or other network VP if appropriate, copying the home GP Practice Manager (PM), Director and Senior Director, RSA, CESSO, E&S PMs and Directors and Senior Directors, LEGEN (with cc to the Country Lawyer), E&S specialists, RSC, and ECR.

[40] Quality standards for medical care can found at: http://www.who.int/reproductivehealth/publications/post-violence-care-in-health-facilities/en/ Other service standards can be found at: https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE.Minimum.Standards.Publication.FINAL_.ENG_.pdf

[41] While some have expressed concerns that projects may engender GBV reporting, experiences have shown that reporting of GBV is generally low globally. Even though a third of women experience violence by an intimate partner, or sexual violence by a stranger, only 7 percent of women and girls experiencing GBV report the incident to a formal source (regional variations include 2 percent in India and East Asia to 14 percent in Latin America and the Caribbean).

121. The information required to meaningfully report to management on GBV cases should come from the monitoring of cases of GBV in the GRM and by reviewing regular supervision consultant's reports. As noted in Section 4.8, Task Teams should include key data on GBV in the Aide-Memoires and ISRs.

5.6 Resolving and Closing a Case

122. There are two elements related to resolving and closing a GBV case:

- The internal project system, in which the case is referred to the GBV Services Provider for survivor support, and through the established GBV resolution mechanism appropriate actions are taken against perpetrators; and,
- The support that the survivor receives from the GBV Services Provider.

123. As described earlier, when a complaint is received, it is registered in the project GRM and referred to the GBV Services Provider with the consent of the complainant. The service providers initiate accountability proceeding with the survivor's consent.

- If the survivor does not wish to place an official complaint with the employer, the complaint is closed.
- When the survivor proceeds with the complaint, the case is reviewed through the established GBV resolution mechanism and a course of action is agreed upon; the appropriate party who employs the perpetrator (i.e., the contractor, consultant, or IA) takes the agreed disciplinary action in accordance with local legislation, the employment contract and the CoC. Within the established resolution mechanism, it is confirmed that the action is appropriate, and then informs the GRM that the case is closed.

124. All GBV survivors who come forward before the project's closing date should be referred immediately to the GBV Services Provider for health, psycho-social and legal support. If a project closes with GBV cases still open, prior to closing the project appropriate arrangements should be made with the GBV Services Provider to ensure that there are resources to support the survivor for an appropriate time after the project has closed, and at a minimum for two years from the time such support was initiated. Funding for this cannot be provided by the project after the closing date, so other arrangements will need to be made, such as financing by the borrower, involving other projects within the portfolio that may have aligned objectives and budget flexibility—or in extreme circumstances the project closing date may need to be extended.

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Annex 1: Codes of Conduct and the GBV Action Plan

125. To build a system for GBV risk mitigation, projects must:

- Have all employees of contractors (including sub-contractors), supervision consultants and other consultants with a footprint on the ground in the project area sign CoCs;
- Have an effective GBV Action Plan so that workers understand behavior expectations and policies, as well as the accountability and reporting mechanism. This Action Plan should include training and communication. It should also include plans to make the project-affected community aware of the CoC the project-related staff have just signed; and,
- As part of the GBV Action Plan, define accountability and response protocols, which set out the procedures followed for holding individuals accountable and penalizing staff that have breached GBV policies.

Codes of Conduct

126. As the CoC establishes expectations for behavior within a company and within the community which the company serves or works in, it becomes an instrument to assist in mitigating risks related to SEA and SH. The CoC clearly defines obligations of all project staff (including sub-contractors and day workers) regarding:

- Policies related to GBV, specifically SEA and workplace SH;
- Compliance with applicable labor legislation;
- Norms and regulations of conduct for all personnel;
- An understanding that GBV is prohibited and all transgressions will be acted upon;
- The CoC should cover the commitment of the company, and the responsibilities of managers and individuals with regard to GBV, and if possible, other key issues identified in the ESA/ESMP/C-ESMP, such as ESHS and OHS; and,
- It is important that the CoC be translated into the local language.

127. To enable dissemination of the principles laid out in the CoC and the consequences of its breach, an awareness raising strategy should be attached to the CoC as part of the GBV Action Plan. Raising awareness of CoC standards should be targeted to both company personnel and the members of the project-affected community.

128. It is essential that the CoC be discussed at public consultations and its standards posted in public spaces at the contractor's work camps and living areas in local languages (see Chapter 3 on Community Consultations). It is also critical that this extend beyond the specific location where civil works are taking place into the wider project adjoining communities as defined in the project's ESA/ESMP, since neighboring communities are at risk of GBV, particularly when workers are highly mobile.

129. Consent is a crucial element of a CoC and refers to the informed choice a person makes to agree freely and voluntarily to do something. CoCs used in World Bank-financed projects must reflect these principles (see Chapter 2). In the context, while the CoC need not prohibit consensual sex with someone age 18 and above, the CoC should explicitly require that workers behave in accordance with national law.

130. The World Bank has not endorsed a 'template' CoC for projects. Indeed, the World Bank's 2017 SPDs and SBDs for International Competitive Bidding of civil works and OPRC contracts make it clear that the expectation is that bidders already have their own CoCs, or may develop them for bidding. This is reflected in the Works SPD requirement that:

"The Bidder shall submit its Code of Conduct that will apply to Contractor's Personnel (as defined in Sub-clause 1.1.2.7 of the GC), to ensure compliance with its Environmental, Social, Health and Safety (ESHS) obligations under the contract. [Note: Complete and include the risks to be addressed by the Code in accordance with Section VII-

Works' Requirements, e.g. risks associated with: labor influx, spread of communicable diseases, sexual harassment, gender based violence, sexual exploitation and abuse, illicit behavior and crime, and maintaining a safe environment etc.]

In addition, the Bidder shall detail how this Code of Conduct will be implemented. This will include: how it will be introduced into conditions of employment/engagement, what training will be provided, how it will be monitored and how the Contractor proposes to deal with any breaches.

The Contractor shall be required to implement the agreed Code of Conduct."

131. The SPDs outline the key requirements for the Bidder's CoC as follows:

"[A minimum requirement for the Code of Conduct should be set out by the Employer, taking into consideration the issues, impacts, and mitigation measures identified, for example, in:

- *project reports e.g. ESIA/ESMP*
- *any particular GBV/SEA requirements*
- *consent/permit conditions* ***(regulatory authority conditions attached to any permits or approvals for the project)***
- *required standards including World Bank Group EHS Guidelines*
- *relevant international conventions, standards or treaties, etc., national, legal and/or regulatory requirements and standards (where these represent higher standards than the WBG EHS Guidelines)*
- *relevant standards e.g. Workers' Accommodation: Process and Standards (IFC and EBRD)*
- *relevant sector standards e.g. workers accommodation*
- *grievance redress mechanisms.*

The types of issues identified could include risks associated with: labor influx, spread of communicable diseases, sexual harassment, gender-based violence, illicit behavior and crime, and maintaining *a safe environment etc.]*

[Amend the following instructions to the Bidder taking into account the above considerations.]

A satisfactory code of conduct will contain obligations on all Contractor's Personnel (including sub-contractors and day workers) that are suitable to address the following issues, as a minimum. Additional obligations may be added to respond to particular concerns of the region, the location and the project sector or to specific project requirements. The code of conduct shall contain a statement that the term "child" / "children" means any person(s) under the age of 18 years.

The issues to be addressed include:

1. *Compliance with applicable laws, rules, and regulations*
2. *Compliance with applicable health and safety requirements to protect the local community (including vulnerable and disadvantaged groups), the Employer's Personnel, and the Contractor's Personnel (including wearing prescribed personal protective equipment, preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment)*
3. *The use of illegal substances*
4. *Non-Discrimination in dealing with the local community (including vulnerable and disadvantaged groups), the Employer's Personnel, and the Contractor's Personnel (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, or health status)*
5. *Interactions with the local community(ies), members of the local community (ies), and any affected person(s) (for example to convey an attitude of respect, including to their culture and traditions)*
6. *Sexual harassment (for example to prohibit use of language or behavior, in particular towards women and/or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)*

7. *Violence, including sexual and/or gender based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberty).*
8. *Exploitation including sexual exploitation and abuse (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading behavior, exploitative behavior or abuse of power)*
9. *Protection of children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behavior towards children, limiting interactions with children, and ensuring their safety in project areas)*
10. *Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)*
11. *Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection)*
12. *Respecting reasonable work instructions (including regarding environmental and social norms)*
13. *Protection and proper use of property (for example, to prohibit theft, carelessness or waste)*
14. *Duty to report violations of this Code*
15. *Non- retaliation against workers who report violations of the Code, if that report is made in good faith.*

The Code of Conduct should be written in plain language and signed by each worker to indicate that they have:

- *received a copy of the code;*
- *had the code explained to them;*
- *acknowledged that adherence to this Code of Conduct is a condition of employment; and*
- *understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.*

A copy of the code shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in languages comprehensible to the local community, Contractor's Personnel, Employer's Personnel and affected persons."

Box A6.1: The Pacific Islands Transport Code of Conduct

Starting in 2014, transport projects under the 'Pacific Aviation Investment Program' (PAIP) implemented 'Child Protection' CoCs for all companies and individuals working on the project. In 2016 these were expanded to include GBV, and in 2017, further expanded to also cover ESHS and OHS.

Whereas the World Bank's 2017 SPD approach has bidders developing the CoC, under the PAIP it is the Borrower who adopts the CoC and sets it as the minimum standard to which all suppliers to the project must adhere. The CoC is applied to all activities of the project including civil works (international and domestic bidding), goods procurement, individual consultants, etc. Bidders may choose to use the Borrower's CoC in the bidding or submit their own as long as it meets the minimum requirements of the Borrower's CoC.

In addition to defining the expected behaviour, accountabilities and the response protocol for individuals, the PAIP CoCs include separate CoCs for the company and the managers. This was based on earlier experience in the transport sector with regard to HIV/AIDS, as embodied in the transport sector's 'Road to Good Health' toolkit.[42] The resulting three levels are:

- **Company CoC:** Commits the company to addressing ESHS, OHS and GBV issues;
- **Manager's CoC:** Commits managers to implementing the Company CoC, as well as those signed by individuals; and,
- **Individual CoC:** Commits all persons—including sub-contractors and suppliers—to the standards of behavior.

Contents of a GBV Action Plan

132. As described in Chapter 4, the GBV Action Plan is used to outline the project's GBV prevention and response activities. The GBV Action Plan outlines how the project will put in place the necessary protocols and mechanisms to minimize the risk of exacerbating GBV in the project, as well as to address any GBV issues that may arise. Chapter 4 contains an outline of a GBV Action Plan.

133. Sample GBV Action Plans and other materials to support implementing the recommendations are available at: http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx

Annex 2: Collecting Information on GBV

134. It is generally unnecessary to undertake new surveys to determine GBV risks as key information is likely already available from country-level Demographic and Health Surveys or nationally representative standalone surveys on violence against women and girls. Eliminating various forms of violence faced by women and girls is also part of several of the Sustainable Development Goals and has led to an increase in data collection and reporting on GBV.[43]

135. There should be **absolutely no data collection** related to GBV with anyone who may be a survivor without making referral services available to support them. If data collection is necessary, Task Teams should confirm that protocols are in place to enable referral of participants disclosing experiences of violence **before data collection commences to avoid retraumatizing survivors**. Training of researchers must cover all safety and ethical guidelines related to GBV. **No focus group discussions with community members asking about personal experiences of GBV should be undertaken**. Given that prevalence of IPV and/or non- partner sexual assault affects 35 percent of women aged 15-49, focus groups are likely to have women who are survivors of an incident of GBV. For more information on how to discuss GBV ethically see:

- The Violence Against Women and Girls Resource Guide Ethics page
- Ellsberg M, and Heise L. (2005). Researching Violence Against Women: A Practical Guide for Researchers and Activists. Washington DC, United States: World Health Organization, PATH.
- World Health Organization (2001). Putting women first: Ethical and safety recommendations for research on domestic violence against women.
- World Health Organization (2007). WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies.

136. When data is unavailable, however, and data collection on topics related to GBV, such as help-seeking behaviors, perceptions of quality of GBV Services Providers, or safety mapping of communities is undertaken, the following guiding principles are to be followed and the ethical issues concerning GBV data collection are to be carefully considered. Only if these can be properly implemented, should data collection be done.

- The benefits to respondents or communities of documenting GBV must be greater than the risks to them.
- The safety and security of all those involved in information gathering about GBV is of paramount concern and should be continuously monitored.
- Information gathering and documentation must be done in a manner that presents the least risk to respondents, is methodologically sound, and builds on current experience and good practice.[44]
- Basic care and support for survivors must be available locally before commencing any activity that may involve individuals disclosing information about experiences of GBV.
- The confidentiality of individuals who provide information about GBV must be protected at all times.
- Anyone providing information about GBV must give informed consent before participating in the data gathering activity.
- All members of the data collection team must be carefully selected and receive relevant and sufficient specialized training and ongoing support.
- Additional safeguards must be put into place if children (i.e., those under 18 years) are to be the subject of information gathering.[45]

[43] For example, http://dhsprogram.com/What-We-Do/Survey-Types/DHS.cfm.

[44] An example of this is the Ethical and Safety Recommendations section: http://www.vawgresourceguide.org/resources#esr. In particular, Ellsberg, M., and L. Heise. 2005. Researching Violence Against Women: A Practical Guide for Researchers and Activists. Washington DC, United States: World Health Organization, PATH.

[45] See recommendation 8 in World Health Organization (2007). WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies.

Annex 3: GBV in Conflict Zones—Experiences from Cameroon

137. In war zones, or areas of elevated risk of violence, it is often difficult to engage civilian contractors without some form of protection by the police and/or the national army. In extreme circumstances, contractors may not be willing to work in such areas, meaning the government is obliged to engage a specialized military or UN body to undertake the construction. This challenge was faced in the Far North Region of Cameroon as part of the Central African Economic and Monetary Community (CEMAC) Transport and Transit Facilitation Project (TTPF). The project included the rehabilitation of the Mora-Dabanga-Kousseri road, a key section of the Douala-Ndjamena corridor, in an area that had suffered from chronic fragility and recurrent Boko Haram attacks. A contractor had originally been engaged in the project, but works were halted after Boko Haram abducted some of its workers in 2014. It was therefore discussed and agreed with the Government that the Cameroonian Army Corps of Engineers would be engaged through the Ministry of Public Works to undertake the construction under a specific Output-Based-Disbursement-Force-Account arrangement.

138. World Bank-financed projects have worked with military entities in the past but had never used military-related entities to carry out construction works in an active conflict zone. Deploying military personnel to a remote and vulnerable area required a very thorough understanding of the risks and potential mitigation measures needed to address them. A local NGO specifically recruited by the World Bank undertook a detailed social risk assessment that identified, among others, a high risk of human rights violations and GBV for communities along the road. This led the team to develop some specific mitigation measures to address this risk, including:

139. A dedicated GRM (with ability to document cases of GBV) and a social communication plan managed by that same NGO with specialized and trained staff to work on GBV prevention, identification and response engagement;

140. Extensive community sensitization;

- Human rights, GBV, and civil-military engagement training of military conducted by the International Crescent of the Red Cross;
- Screening of all military personnel assigned to work on the project with specific provisions applying to all military personnel associated with the project, including clear response processes in case of violations; and,
- Active monitoring of the project area through a Bank-financed independent TPM, along with the NGO hired to implement the GRM.

141. The monitoring framework was complemented by a decentralized PMU and two supervision consultants. Given the engagement of the army in the construction, these specific social mitigation measures, normally reflected in the bidding documents and the contract, were reflected in the Financing Agreement of the project.

142. For further information on the integration of GBV aspects into the project see here.

Annex 4: The GBV Risk Assessment Tool

143. To help assess the risk of project-related GBV, the Gender Group alongside colleagues from various GPs have developed the GBV Risk Assessment Tool.[46] The goal of the tool is to stimulate thinking around the risk of project-related GBV. The tool draws on information from a variety of sources to give each project a risk 'score' based on the responses to each individual question. The risk score is calculated on a scale of 0 to 25: projects that score 0-12.25 are considered '**Low**' risk; 12.5-16 '**Moderate**' risk; and projects that score 16.25-18 represent a '**Substantial**' risk, and project that score 18-25 are considered '**High**' risk projects. Projects that are in preparation use sections A and B and aggregate the scores for each section, which can be completed during the PCN phase. On the basis of the additional information gathered during project preparation, the risk should be updated as appropriate for the Quality Enhancement Review (QER) meeting or at the Decision Review meeting.

144. This tool does not address how the project itself may promote gender equality and reduce GBV through its activities. Rather, this is an attempt to reduce GBV and particularly, the risk of SEA, and allow Task Teams to determine the risk level of a project to increase GBV.

145. The tool is comprised of the following sections:

- Section A provides an overview of the '**Country context**' specifically related to the country's commitment to gender equality and national incidence of violence.
- Section B, '**Project context',** is critical since no matter what the country context, the project in itself can create new risks and vulnerabilities for GBV that may not have existed before. This section is weighted more heavily than section A.

146. It is important to note that none of the indicators in the tool can alone predict GBV, nor does having a good score on any one indicator protect a project from the risk of exacerbating GBV. No matter what the project context, Bank projects can influence the risk of GBV, often increasing it, by virtue of shifting existing power dynamics and financial relationships. A lower risk score does not mean that the project does not carry any danger of exacerbating GBV; a high-risk score does not mean that the project cannot proceed. Rather, this is a tool to help Task Teams to think about the types of measures needed to prevent GBV and adequate response provisions that can be implemented to best accommodate their project setting.

147. The tool contains indicators on GBV against which Task Teams assess their project. For example, the first two indicators under Section A provide an estimate of how prevalent IPV and any sexual violence perpetrated by a partner or a non-partner is at the national level. The first indicator 'Prevalence intimate partner violence' is intended to give an overview of levels of violence against women in the country. No direct correlation has been established between the risk of SEA within a project and the levels of violence against women and girls in countries; however, this statistic is important for giving a sense of the country context within which the project occurs. The national IPV prevalence is compared with the regional average as per WHO regional estimates (2013). To assess the risk, higher risk is where national IPV prevalence is above the regional average[47] and lower risk is where national IPV prevalence is below the regional average (Figure 6). Section A will be pre-populated to provide context for Task Teams on the country's commitment to gender equality and national incidence of violence.

[46] In addition, an accompanying Risk Assessment Methodology Guidance Note provides greater detail and guidance for the Risk Assessment Tool and can be found here.
[47] Per WHO 2013.

Item Number									
	P# Here:								
	Project Name Here								<--TTLS: Fill out the cells in yellow
	Characteristic	Measure	Rating	Numeric Rating	Possible scoring	Low Score	Medium Score	High Score	
	Section A: Country Context								
	Country-level violence background								
1	Prevalence intimate partner violence (select the country then in the 'Common Indicators' tab and scroll to "Physical or sexual violence by a husband/partner)				0 (below regional average), 1 (above regional average)	0		0.5	Regional IPV average is 41.75%
2	Prevalence of any form of sexual violence (select the country then in the 'Complete List' tab and click the "Domestic Violence" tab. Select the "Experience of sexual violence" option, then select "Women who ever experience sexual violence" option)				Higher Risk is having IPV prevalence above regional average per WHO 2013 (See Table 2, Annex 1. Lower Risk is having IPV prevalence below the regional average per WHO 2013 (See Table 2, Annex 1)	0		1.0	Regional sexual violence prevalence by non -pamer 9.15%
3	State Department Trafficking in Persons report (Tier 1-3, with one low and 3 high risk)				Lower risk is Tier 1 Medium risk is Tier II Higher risk is Tier III and Tier II watch-list	0	0.25	0.5	
4	Presence of Peace-keeping mission				0 is if there is no mission, 1 if there is a mission	0		0.5	

Figure 6. GBV Risk Assessment Tool Section A - Country Context – Questions 1-13

148. Task Teams fill out Section B, on project-related risks and vulnerabilities for GBV (Figure 7). For example, the tool contains the indicator on the level of infrastructure construction to capture whether the project includes any infrastructure construction or upgrading, as such projects can change the community's landscape and use of space, social dynamics, and labor influx, and can affect the safety of workers involved in the construction as well as of women, girls and boys using or living in the surrounding areas. Higher risk is where there are major or substantial construction works, while lower risk would have small amounts of construction works.

	Section B: Project Context							
14	Is project in a humanitarian area of the country? Go to Country in the "Countries" tab--> click on Map of the country and view "Maps & Infographics section" and "Updates" for latest humanitarian and emergency situation.				Higher risk is humanitarian or emergency situation in project area Lower risk is no presence of humanitarian or emergency situation in project area	0		2
15	How much infrastructure construction, upgrading or rehabilitation does your project entail? (major = higher risk, medium quantity= medium risk, small amount=lower risk)				Lower risk is No Higher risk is Yes	0		1
16	According to the guidance from the labor influx note, rate your project as high, medium or low risk related to the level of labor influx. If there is no labor influx, choose the low risk option.				Low, medium and high (self judgement) as per guidance criteria: Higher risk can be associated with large number of workers, small remote community (low absortion capacity)context with pre-existing social conflicts, high prevalence of GBV, weak law enforcement, presence of specific marginalized, vulnerable, ethnic groups	0	1	2

Figure 7. GBV Risk Assessment Tool Section B - Project Context Questions 14-25

Annex 5: Addressing GBV in the Contractor's ESMP

149. As described in Chapters 3 and 4, the project's ESMP for addressing GBV risks. **Figure 8** shows the overall process from preparation through to construction.

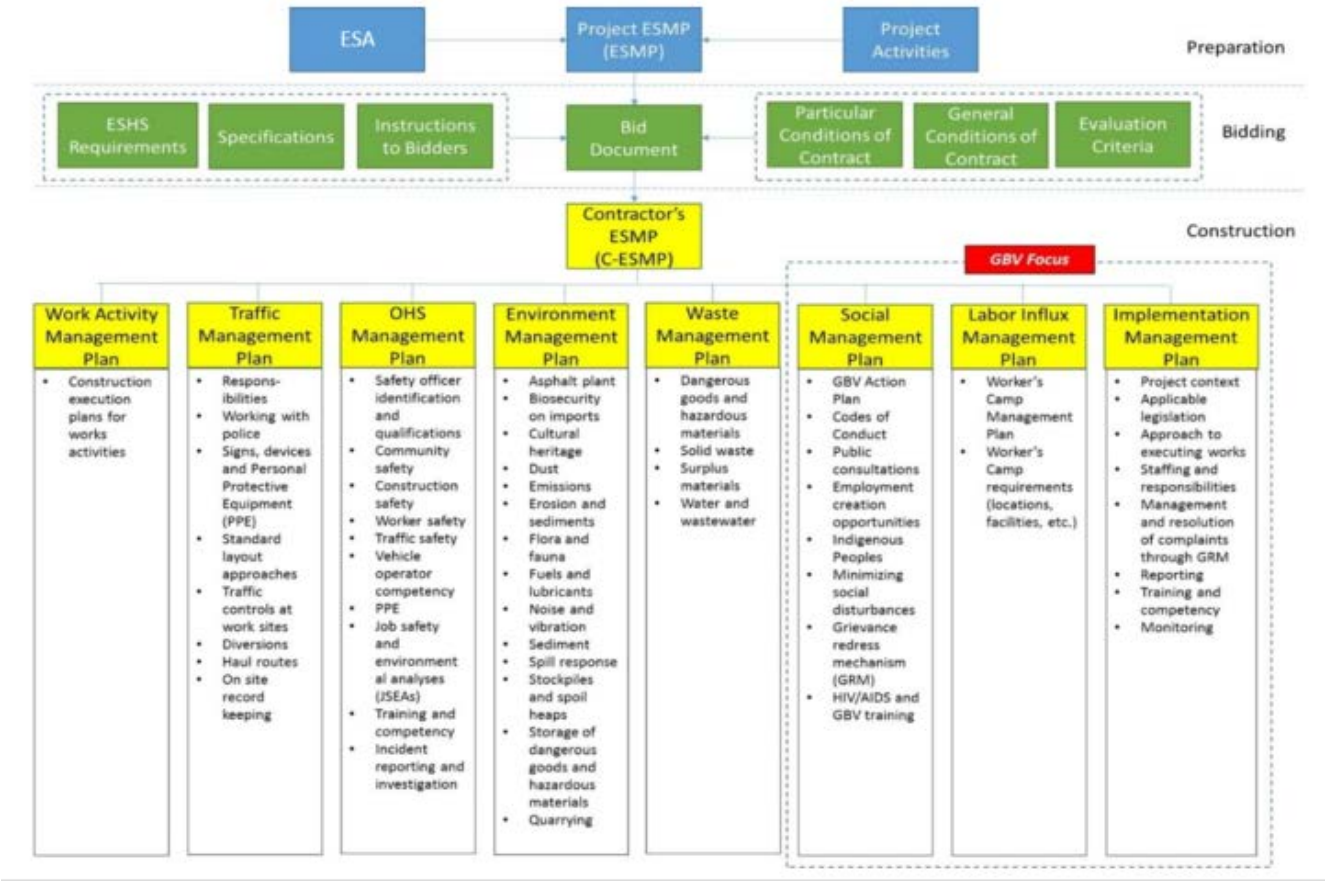

Figure 8: Managing Environmental and Social Risk from Project Preparation to Construction

150. During preparation, the ESA (if prepared) and project ESMP are prepared by the Borrower, publicly consulted on, reviewed and cleared by the World Bank, and publicly disclosed. The Borrower is required to implement the project ESMP as part of the World Bank's Financing Agreement with the Borrower. The project's ESMP principles are embodied in the project's ESHS requirements, specifications, along with the other procurement related elements to form the bidding documents, with the project ESMP often included as part of the bidding document.

151. In the bid, contractors have to provide a number of management plans[48] and these ultimately become part of the C-ESMP which the contractor must follow during civil works. The management plans will vary depending upon the nature of the projects, but GBV needs to be included as appropriate (see **Figure 8**).

152. The C-ESMP is the plan prepared by the contractor outlining how it will implement the works activities in accordance with the ESMP's requirements and in accordance with the contract. A cornerstone for addressing GBV, and more broadly the ESHS risks, during implementation is the development of an effective C-ESMP. Contractually,

[48] As part of the bid, the contractor submits Management Strategies, Implementation Plans, and a CoC. The contractor also submits, on a continuing basis, for the Engineer's prior approval, such supplementary Management Strategies and Implementation Plans as are necessary to manage the ESHS risks and impacts of ongoing works. These Management Strategies and Implementation Plans collectively comprise the C-ESMP.

the contractor must follow the C-ESMP, which is why it is important that the C-ESMP build upon the findings and proposed measures identified in the project ESA and ESMP.

153. The C-ESMP should include:

- **Implementation of GBV Action Plan and Accountability and Response Framework:** As described in Chapter 4, this is the detailed plan by which the contractor will implement the GBV Action Plan outlined in the project ESMP;
- **Code of Conduct:** The agreed CoC to address behavior which will be used on the project for the contractor's workers, including sub-contractors and suppliers;
- **Training Plan:** The plan for training workers on GBV;
- **Community Consultation Plan:** The strategy by which—in consultation with the IA—the local communities in the project's adjoining communities will be advised on the project activities, how to make complaints, as well as GBV support services; and,
- **Labor Influx Management Plan:** Should the project involve the influx of labor, how this influx will be managed—particularly to address GBV risks.

154. To ensure that the GBV risks are managed, it is important that:

- The contractor should prepare the C-ESMP in accordance with the requirements of the project ESMP. The C-ESMP should provide a detailed explanation of how the contractor will comply with the project's safeguard requirements (embodied in the ESMP) and demonstrate that sufficient funds are budgeted for that purpose.
- The contractor not carry out **any** works, including mobilization and/or pre-construction activities (e.g., limited clearance for haul roads, site accesses and work site establishment, geotechnical investigations or investigations to select ancillary features such as quarries and borrow pits), unless the Supervision consultant[49] is satisfied that appropriate measures are in place to address GBV risks and impacts through the C-ESMP.[50]
- Public consultations be held on the C-ESMP, with the active participation of the contractor [51] and the supervision consultant's safeguard specialist. These consultations must be well documented and include separate consultations with women and girls.
- The World Bank's safeguard and technical specialists review the C-ESMP and provide the Bank's technical 'no objection' to it being used.[52]
- The C-ESMP may be publicly disclosed on the Borrower's project web site, and at other local locations.[53]

155. The approved C-ESMP be reviewed periodically (typically not less than every six months), and updated in a timely manner, as required, by the contractor so that it contains measures appropriate to the works activities to be

[49] Under the FIDIC contract, which is commonly used for supervising civil works financed by the World Bank, the "Engineer" is the client's representative who is responsible to watch and supervise works, and test and examine materials to be used and workmanship employed in connection with the works. As part of the supervision team, there is the appointed "Engineer," who is often supported by "resident engineers" in the field. Other members of the supervision team include safeguard specialists.

[50] With the agreement of the client and Engineer, a staged C-ESMP may be prepared addressing specific agreed activities (e.g., mobilization). However, mobilization should not commence until GBV and labor influx management elements of the C-ESMP have been approved.

[51] Wording such as this should be included in the bidding document: ""The Contractor shall participate in public consultations on the C-ESMP by attending public meetings at its own expense as requested by the Engineer to discuss the C-ESMP or any other aspects of the project's environmental and social compliance of interest to the public."

[52] While this is not a required Bank policy, it is good practice.

[53] Based on advice from the Legal Vice Presidency, while the project ESMP is disclosed by the World Bank through the external website, this should not be done for the C-ESMP.

undertaken. The updated C-ESMP is subject to prior approval by the Supervision consultant, and ideally redisclosed on the IA's web site.

156. The C-ESMP must include specific mitigation measures based on the ESMP, the final project design, the proposed construction method statements, the nature of the project site, etc. As shown in **Figure 8**, the C-ESMP should include specific management plans addressing the various risks of the project. GBV is usually addressed as part of the overall 'Social Management Plan', which identifies how to manage the impact of the project on the local community and workers.[54] For high risk situations, the C-ESMP should include a labor influx plan to manage the impacts of labor influx on communities, especially with regard to GBV including SEA.[55]

[54] Examples of Action Plans are at: http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx.
[55] Examples of ESMPs are at: https://tinyurl.com/esmps-C-ESMPs.

Annex 6: Working with GBV Services Providers

157. One of the most effective ways of addressing GBV lies in working with GBV Services Providers and community organizations that are able to support the project in addressing any cases of GBV that may arise in the context of a project, while also working to understand increased risks and proactively prevent GBV that arises in the context of a project. Prior to project appraisal, teams therefore need to identify organization(s) (e.g., NGOs and local institutions) who are trusted by the local community and are working on GBV prevention and response. In areas with high GBV prevalence, there may already be an existing mapping of GBV prevention and response actors in a given community. Coordination with local women's organizations, government stakeholders (e.g., Ministry of Women's Affairs, Ministry of Health, etc.) and United Nations (UN) agencies is essential.

158. GBV Services Providers for survivors of GBV should be identified in accordance with international standards that articulate a minimum basic package of services, ideally including case management support, health services, psychosocial support, police support and security, access to legal services, and shelter, if needed. When identifying GBV Services Providers, the quality of service provision should be a key consideration.

159. In keeping with a survivor-centered approach, accessing services should be the choice of the survivor. Access to police and justice services should be made available in the instance that the survivor would like to pursue charges through the local justice system.

160. It is important to map community organizations working on women's and girls' rights as they may be both entry points to services for survivors and useful allies for awareness raising activities around the CoCs. When identifying community-based organizations, look for those with experience working with the local population to address the root causes of GBV by providing livelihood support or by implementing community-based interventions to challenge the norms and attitudes that underlie GBV. These two activities fall under the broad categories of GBV prevention and response.

161. The activities that GBV Services Providers will provide a project will depend upon the risk level. These can include the following:

- Undertaking a community mapping of GBV risk 'hot spots' and vulnerable target groups[56] that may be most susceptible to GBV arises in the context of the project, particularly SEA;
- In consultation with the IA, on the basis of the community mapping, identifying the specific GBV prevention activities to be undertaken to address GBV risks (see Section 2 for the types of risks to be considered);
- Providing services to survivors and/or becoming a victim advocate/victim accompaniment, case management organization. If required and in High risk situations, the project should equip this organization with funds that will enable it to facilitate access to timely, safe and confidential services for the survivor (including money for transportation, documentation fees, and lodging if needed);
- Providing training related to ensuring knowledge of standards laid out in the CoC and services that are available for survivors;
- Ensuring that the project has 'safe spaces' where survivors can report incidents of GBV to trained personnel;
- Raising awareness around the existing accountability mechanisms and supporting the development of a Stakeholder Engagement Plan; and,
- Channeling complaints to the appropriate accountability mechanism (see Annex 7).

162. **Contracting the GBV Services Provider.** Experience has shown that the most effective approach is for the IA to hire the GBV Services Provider. Among the advantages of this approach are:

- The same GBV Services Provider can be used for multiple contractors, which is not only more cost effective, but also helps ensure consistent provision of services across the project.

[56] For example, young women, aged 13-25 – specifically targeting school-aged girls and youth groups; young women, aged 25-35; young men, aged 14-25, school-aged boys and men who have sex with men; and commercial sex workers (particularly for HIV/AIDs).

- The GBV Services Provider can be contracted and mobilized well in advance of the contractor, thereby avoiding any risks of gaps in support during the initial stages of the project.
- Having the GBV Services Provider report directly to the IA will make it easier to ensure quality control and consistency of service delivery.

163. Ideally the GBV Services Provider would also cover HIV/AIDS support services—but not all have the capabilities to do so. In High GBV risk contexts, it may be advisable to put a GBV Services Provider/NGO under contract to the IA to provide a range of GBV prevention services throughout the life of the project, as well as case referral services if cases of GBV arise under the project. In other (somewhat less risky) circumstances, it may be more appropriate to require the IA to hire a fulltime GBV specialist (typically as part of its PMU) to ensure the provisions are being adhered to appropriately.

164. Sample TOR (both for GBV Services Providers/NGOs and for GBV specialists hired by the IA) are provided at: http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx

Annex 7: GBV in Grievance Redress Mechanisms

165. The World Bank's ESF requires that: "the Borrower [is] to provide a grievance mechanism, process, or procedure to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project, in particular about the Borrower's environmental and social performance. A grievance mechanism will be proportionate to the risks and impacts of the project." ESS 10 defines the requirements of a GRM, which are meant to apply to all aspects of the project,[57] not just GBV.

166. Annex 1 of ESS10 proposes that a GRM should have:

- Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, email or via a website;
- A log where grievances are registered in writing and maintained as a database;
- Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;
- Transparency about the grievance procedure, governing structure and decisionmakers;
- An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved; and,
- An option for mediation when users are not satisfied with the proposed resolution.

167. The costs of operating the GRM are usually modest and should be financed by the IA as part of the general project management costs. The GRM needs to be in place prior to the contractor mobilizing.

168. The GRM needs to have multiple channels where complaints can be registered. Particularly for GBV, where risks of stigmatization, rejection and reprisals against survivors create and reinforce a culture of silence, complainants may be reticent to directly approach the project management team. Additional measures may therefore be needed to enable reporting.

169. The GRM is either operated by the IA or, for GBV, in some instances by the GBV Services Provider. Figure A9.1 is an example of this from the Vanuatu Aviation Investment Project and Figure A9.2 from the Mozambique Integrated Feeder Road Development Project.

170. IT-based solutions have been used on transport projects to implement the GRM, including: (i) the Grievance Complaint Logging System (GCLS), an Open Source/Joomla system implemented on Pacific Island Country transport projects;[58] and (ii) the Feedback Resolve implemented for Albania transport projects.[59] Using IT-based solutions also helps projects to meet the World Bank's goals of improving citizen engagement.[60]

171. When trying to integrate avenues for GBV-related complaints into a project GRM, thought has to be given to the sensitive nature of these complaints and how and by whom these will be managed, and actions taken. Above all key is **not** to collect data on any type of GBV through a project GRM unless a referral to a GBV Services Providers can be made, and the GRM operators are trained on how to collect GBV cases confidentially and empathetically (with no judgement). If both of those requirements are met, the GRM should not ask for, or record, information on no more than three aspects related to the GBV incident:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);

[57] ESF 10 notes that the same GRM can be used for land acquisition and resettlement (ESS5) and Indigenous Peoples (ESS7), but recommends a separate one for project workers under ESS2.

[58] www.isafeguards.com

[59] http://rrugadixhitale.al

[60] The November 2014 "Results Framework and M&E Guidance Note, Annex 4" contains indicative citizen engagement indicators for Bank-financed projects. An effective GRM will allow projects to potentially address up to three of the proposed indicators: (i) grievances registered related to delivery of project benefits that are addressed (%); (ii) grievances responded to and/or resolved within the stipulated service standards (%); and (iii) project-supported organization(s) publishing periodic reports on GRM and how issues were resolved [including resolution rates] (Yes/No).

- The age of the survivor; and,
- If, to the best of their knowledge, the perpetrator was associated with the project.

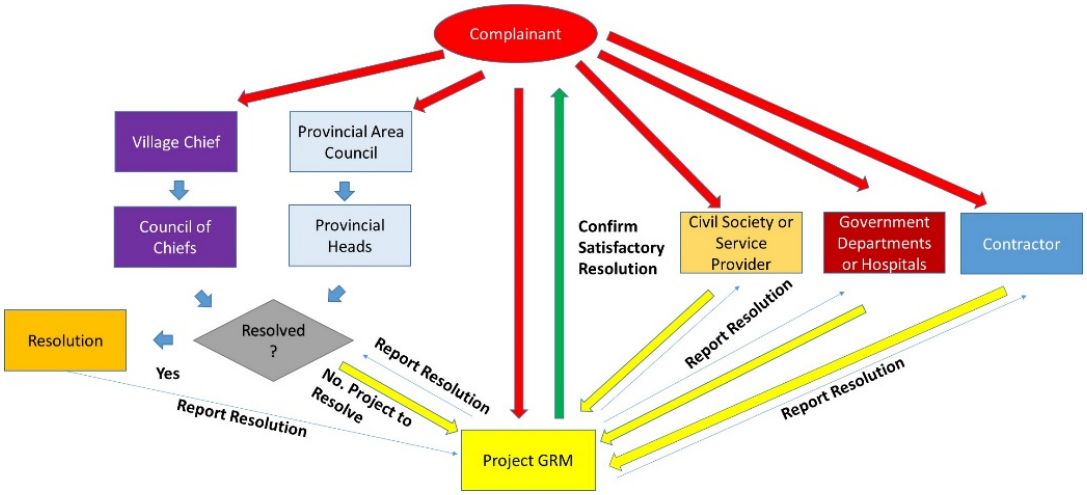

Figure A9.1: Example of Complaint Channels for Vanuatu Aviation Investment Project

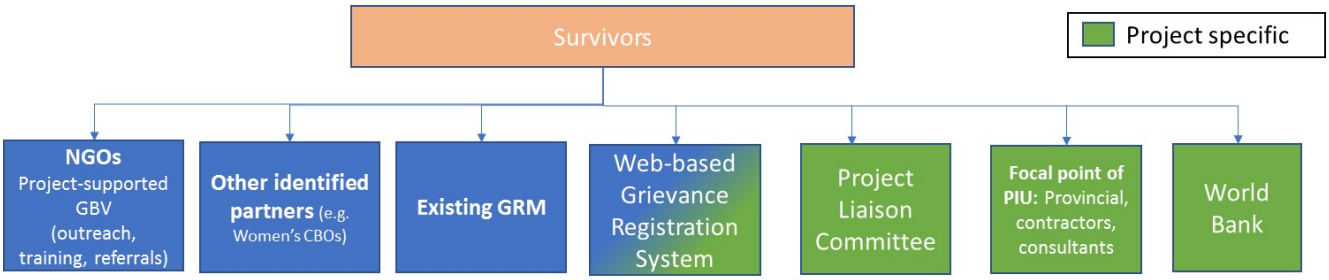

Figure A9.2: Entry Points for Sexual Exploitation and Abuse Survivors to Access Project in Mozambique Road Project

172. Any complaint of GBV, unless the complaint was received through the GBV Services Provider, , should immediately be referred to the GBV Services Provider[61]. It is up to the survivor, and only the survivor, whether to take up the referral.

173. Two options for addressing GBV in the GRM process include:

174. Have it as part of the overall project GRM (an example from the Vanuatu Aviation Investment Project is in Figure A9.3); or,

175. Have an independent GRM for GBV cases operated by the GBV Services Provider as part of the support services that are financed under the project.

176. There are advantages and disadvantages with both, and the approach selected will depend upon the specific situation and capabilities of the GBV Services Provider. A key consideration is the ability to provide the necessary channels for receiving complaints (i.e., there has to be a wide range of avenues to make complaints if the survivor desires to register the incident in the GRM). Having a single project GRM provides a single channel for all issues concerning the project so it is easier to manage and to promote to the local communities. This requires, however,

[61] It does not matter whether the GBV complaint is project-related, all complaints should be referred.

that the information be carefully managed so that confidentiality is protected, and the GRM operators must be properly trained.

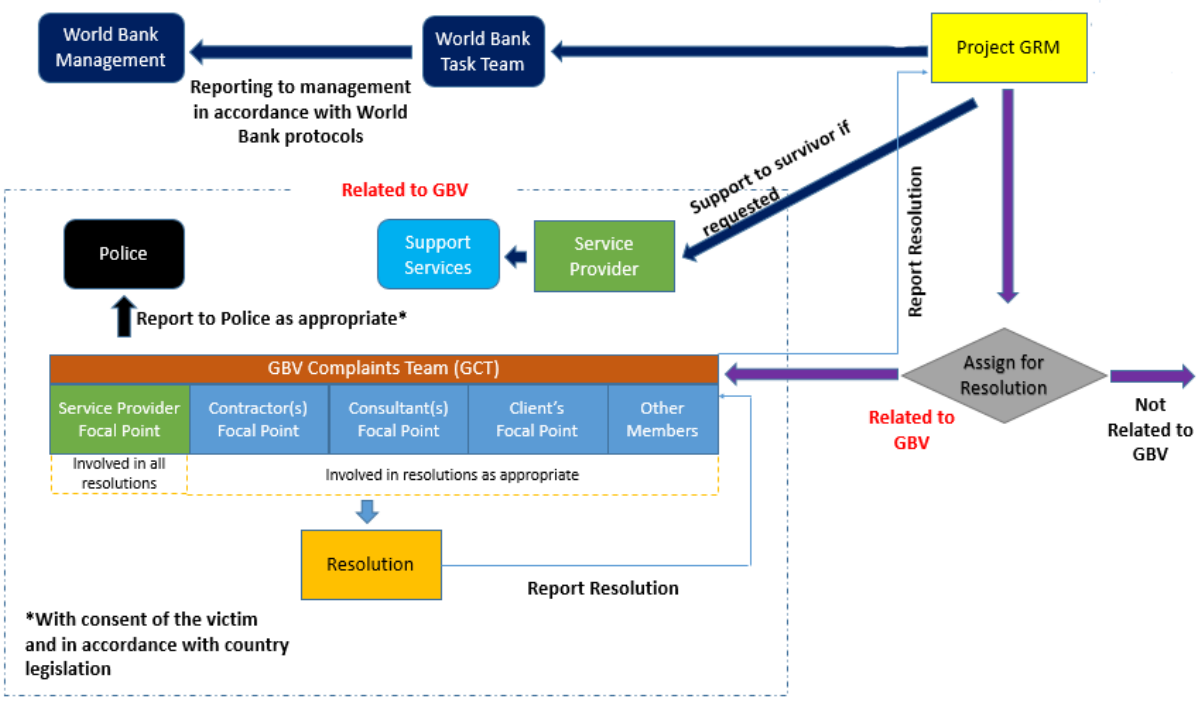

Figure A9.3: Vanuatu Aviation Investment Project GBV Complaint Resolution Process

177. Figure A9.3 also shows an approach that has been applied in the Vanuatu Aviation Investment Project to address a GBV complaint:

- The Task Team is advised of a complaint by the GRM operator or another party and the task team advises management in accordance with the required reporting protocols;
- The survivor is referred by the GRM operator to the GBV Services Provider for support;
- The complaint is referred to the GBV Complaints Team (GCT) which:
  - Reviews the case and collectively agree upon the appropriate actions to be taken and sanctions, if any.
  - Refers the case to the police as appropriate (see Chapter 5).
  - Assigns the appropriate 'Focal Point[62]' to implement the actions—with the assistance of the GBV Services Provider—in accordance with their employment contract.
  - Upon resolution, the Focal Point and GBV Services Provider advise the GCT that it has been resolved, who in turn advise the GRM operator.
  - The GRM operator notes the resolution and closes the case.

[62] Focal Points can be HR representative experienced in handling staff and knowledgeable of the CoC and accountability mechanisms.

Annex 8: Using Technology to Address GBV

178. There are several ways technology can be used to raise awareness of GBV, help mitigate GBV risks, and enable better monitoring and response to GBV incidences. It is important to note that social media should **not** be used, e.g. for monitoring or as an alert mechanism, as confidentiality and security of GBV survivors is paramount.

179. Some examples of technologies that have been developed externally and by World Bank Task Teams are:

- **Great Lakes Trade Facilitation Project: Leveraging technology to measure and monitor GBV risks.** Small-scale cross-border trade is a key source of livelihoods for many in the developing world. In Sub-Saharan Africa, the vast majority of those traders are women. Every day, they cross borders multiple times to trade in goods and also services, facing risks of abuse and exploitation including SH and other forms of GBV. In response to such challenges, the World Bank is currently supporting various measures, including the implementation of the 'Great Lakes Trade Facilitation Project' (GLTFP). Active at selected borders between the Democratic Republic of Congo, Rwanda, and Uganda, and with plans for extensions to others in Burundi, Tanzania, and Zambia, the intervention aims at facilitating small-scale cross-border trade through infrastructural improvements, policy and procedural reforms, capacity building, an awareness-raising, along with other measures to improve behavior at target border locations and to prevent and mitigate GBV risks. Some GLTFP measures rely on state-of-the-art technology. In each target country, for instance, the project supports the establishment of national toll-free phone line systems to allow traders, and especially women, to anonymously report abuses suffered at the border, both via SMS and voice calls, using basic GSM handsets with no access to the internet. Reports would then be automatically stored in and processed by a cloud-based, open-source platform, and subsequently visualized on a website available in two versions: one open to the public, providing details and updates on the status of each issue, that can be used for monitoring and advocacy purposes; and a second, private and only accessible through log-in credentials, which offers selected stakeholders, e.g., border agencies, traders' associations and civil society the opportunity to review and take action on the various issues reported by traders. In order to preserve their privacy and to minimize the risk of retaliation, the system is also designed in such a way that all reports are submitted and reviewed in total anonymity.

180. **GBV module of the Grievance and Complaint Logging System:** The Grievance and Complaint Logging System (GCLS) is a free and open-source database system developed by the Pacific Transport team to receive and manage complaints. The system has an add-in module that allows survivors of GBV to safely and securely submit their grievance through the project website. On the backend where complaints are processed, the name of the survivor and the grievance are encrypted and can only be accessed through a one-time access password that is sent to a pre-configured email address managed by the responsible grievance manager or GBV Services Provider. A copy of the anonymized complaint is also directly submitted to the responsible Task Team Leader.

181. **Road Safety app:** A transport team in India led the development of a Road Safety app which has a special focus on women's safety. The road safety solution comprises two parts: (i) a mobile app for citizens; and (ii) a control room application for road safety authorities. The mobile app is used by citizens to alert friends and authorities when in need. It has an easy-to-use interface, from which a person who has met with an accident or is a victim of a street crime can choose the appropriate option, with immediate alerts sent to the relevant nearby authorities and to a pre-configured set of family members. In case of incidents of stalking or violence against women and girls, where it may not be possible to open the app on the mobile, the team developed an option whereby women can press a button on a smart amulet (that can be worn conspicuously as a piece of jewelry) to trigger the alert.

182. **Circle of 6:** Circle of 6 is an app that lets users choose six trusted friends to add to a 'circle' to whom the user can automatically send a pre-programmed SMS alert message with the user's location when in a risky or uncomfortable situation. In dangerous and critical situations there are also two pre-programmed national hotlines or local emergency numbers which are called.

183. **myPlan App:** The 'myPlan' is a mobile app to help with safety decisions if a person is experiencing abuse in an intimate relationship. Through the password protected app, a set of personalized questions are asked of survivors to provide guidance on different options available to them to protect themselves.

Annex 9: GBV Training Programs

184. There are some key principles that should be considered when developing the training program:

- **Who:** The GBV training program should be aimed at the target groups identified in the GBV Action Plan. Typically, these are: (i) workers, both from the contractor and sub-contractors; (ii) consultants, such as the supervision consultants or others working in the project area; and, (iii) IA staff involved with the project. Managers are particularly important to train as they have the responsibility for ensuring compliance of staff with the CoCs as well as implementing sanctions for transgressions. Training on GBV should also be done within the project's adjoining communities.
- **When:** All employees should attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to address GBV, and the project's GBV CoC. The sanctions embodied in the CoC need to be clearly explained. It should be noted that the induction course will need to be repeated on a regular basis as new staff start on the project.
- **How Often:** It is recommended that all employees attend a mandatory training course (no more frequently than monthly) for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's GBV goals.

185. At a minimum training should include (see examples of actual training courses at the end of this annex):

- Definition of GBV, in particular SEA and SH, and how the project can exacerbate GBV;
- Roles and responsibilities of actors involved in the project (the standards of conduct for project-related staff should be captured in a CoC);
- Case reporting mechanism, accountability structures, and referral procedures within agencies and for community members to report cases related to project staff;
- Services available for survivors of GBV; and,
- Follow-up activities to reinforce training content.

Case Study 1: GBV Training in Tuvalu

In Tuvalu, the Tuvalu Aviation Investment Project Additional Finance III was the first transport project in the Pacific Islands to use project funds to incorporate "enhanced GBV and VAC training, prevention and support activities." The project allocated USD200,000 for these specific activities and an indicator within the results framework for "Successful implementation of the GBV and VAC program." The GBV and VAC program consists of three pillars: (i) needs assessment, which includes in country consultations, regional partner consultations and a community mapping of high risk areas and available services; (ii) prevention, which includes a CoC, training of workers and managers and community awareness raising activities; and (iii) support services, which includes support for survivors and a series of capacity building trainings for GBV Services Providers.

Under the prevention activities, the IA and contractor are working with the Gender Affairs Department of Tuvalu to deliver worker and manager trainings (see training program below). All workers and managers are required to attend an induction training on GBV and VAC prior to commencing work to reinforce their understanding of the GBV and VAC CoC. Additionally, the worker and manager trainings are designed to sensitize workers on GBV and VAC, the reasons why GBV and VAC occur, gender issues, power dynamics, Tuvalu's laws, available support services for survivors and reporting mechanisms. Managers are required to attend a manager training so that they are familiar with their roles and responsibilities in upholding the CoC and to provide them with the necessary understanding and technical support needed to develop a plan for addressing GBV and VAC throughout the lifetime of the project. The training will also help them better understand their position, power and role as leaders. Refresher trainings for workers and managers are held every other month throughout the duration of the project as separate trainings with the Gender Affairs Department but also during toolbox meetings for consistent and constant messaging.

186. Managers will require additional training to ensure that they are familiar with their roles and responsibilities in upholding the GBV CoC. Managers should be required to attend and assist project facilitated training courses for all employees. Ideally, managers should introduce the trainings and announce the learning evaluations, which should include questions on training quality and a section for suggestions on improving the effectiveness of training. This will help ensure that staff see the importance of the training activities.

187. The project will also need to train:

- The GRM operator for how to handle GBV complaints in a survivor-centered manner; and,
- Any focal points that are part of the GBV case resolution mechanism will need training on empathetic and non-judgmental listening.

Case Study 2: GBV Training in Uganda

In Uganda, a Bank team trained 55 representatives from various government ministries and agencies—ministries such as Energy, Transport, Urban, Education, and Gender, Labor, and Social Development, in April 2017. The two-day training had two goals: the first was to expand the capacity of World Bank staff and their counterparts to address the important issues of GBV within IPF with major civil works; and the second was to enable the workshop's participants to develop roadmaps for concrete action, using guidance and recommendations found in the Violence Against Women and Girls Resource Guide.

The workshop included having participants address the ecological model for partner violence, using group discussions and 'Post-It Notes' to identify key risk factors that intersect with the projects their ministries head. Groups discussed how early marriage, poverty, the lack of land titles, low literacy rates, cultural beliefs, and harmful norms could all be risk factors and drivers of GBV operating in their project-affected communities.

Participants were also given an overview of the Violence Against Women and Girls Resource Guide, which explain how to initiate, integrate, and innovate on measures to prevent and respond to violence against women and girls. Working in groups by sector, participants applied these and other tools to develop roadmaps for different government agencies to use in the implementation of GBV Action Plans, focusing on:

- Working with contractors to prevent SH in the workplace (as well as within the agency and the contracting firms) and other forms of GBV in the project-affected communities (for example, through CoC);
- Strengthening GRMs and other monitoring mechanisms to provide safe and ethical reporting systems for people wishing to report cases of GBV, and their linkage with adequate response; and,
- Promoting interventions to reduce the level of tolerance to GBV by contributing to community mobilization around project sites, including the use of partnerships with NGOs, national and local authorities and other leaders.

Participants concluded that all projects need to guard against GBV. During the sessions, participants opened up about their personal and professional journeys toward a better understanding of the significance of GBV. One participant, a transport engineer, said he had come to realize his job was not only about building roads, it was also about understanding the impact a project had on the communities around the project site, and about managing social risks, especially for women and children. Since the training several agencies have proactively incorporated activities to mitigate the risk of GBV their projects may exacerbate. For example, the Ministry of Energy has asked workers to sign CoC and reinforces the messaging of the CoC in daily toolbox meetings. Moreover, the ministries are not just seeing their operations as a potential for increasing risks of GBV, they are approaching GBV as an area where they can contribute positive change and are committed to playing a part in the elimination of violence against women and girls in Uganda.

Tuvalu - Half Day Manager's GBV Training Program

Time	Topics	Group Work/Tools to Train
0800- 0830	Welcome	• Opening of training, and introduction of program, and participants
0830-0930	Role of a Manager while in Vanuatu Role of a Leader	• Each manager writes thoughts and sticks notes on butcher paper • Discussion
0930-1000	Code of Conduct, do we understand it?	• Have copies available, and read through Code of Conduct and Action Plan • Re-enforce the Code of Conduct - Highlight the role of a leader, emphasize role for the safety and protection of workers against abuse and exploitation and from exploiting and abusing others • What are the organizational responsibilities? Managers are not meant to be police officers and do not have to fill that role. Goal is to promote a positive, safe and respectful work environment and surrounding
1030-1230	CARE of Staff: Violence Against Women and Children (VAWC), Child Sexual Abuse, Exploitation	• Group work on planning a Response Protocol for what a Manager will do if abuse has taken place by one staff, or on one staff • Print out VAWC and GRM referral pathways chart and distribute to managers

Tuvalu - Full Day Worker's GBV Training Program

Time	Topics	Group Work/Tool to Train
0800-0830	Welcome	• Short word of welcome • Participants Introduce themselves • All participants fill out pre-training baseline survey (only for induction sessions)
0830-0930	Understanding Gender & Violence Against Women in Vanuatu	• PowerPoint slide on referral pathways from VAWC Research Results of 2009 on 'Women's Lives & Family Relationships' • One of the following exercises: - Group Work: Perception of Women & Men in Vanuatu - Group Work: Power Dynamics (Tool 17 from Road to Good Health)
0930-1045	Types of Violence against Women and Children	• Definitions of the types of violence – GBV, VAC, Domestic Violence(DV)/IPV, Family and Sexual Violence (FSV) - Rape - Sexual assault (including transactional sex) - Physical assault - Emotional/psychological assault (withholding resources) - Sexual harassment - Cover the definitions used in Codes of Conduct and Vanuatu • Group Work: Norms and social acceptance of violence - Impacts of GBV/FSV, VAWC and DV/IPV on Offender, Victim/Survivor, their Family, Community – how this leads to a culture of violence
1045-1100 Tea Break		
1100-1130 **1130-1200** **1200-1230**	Understanding Laws: Family Protection Act and Penal Code The GRM and Reporting Cases VAWC Services	• What is consent? National and international laws on consent and legal age to give consent. Code of Conduct stance on consent • Penal Code and Family Protection Act, Application for Family Protection Orders (FPO) • How to use the GRM for reporting cases: How and who can you report to? VAIP, VPMU, VAWC, police, etc. • Accountability and confidentiality of all reporters and survivors • Linkages to Code of Conduct • VAWC Counselling & Support Services – How to seek help and/or refer people to VAWC • Services provided by VAWC for survivors of violence • What other support services exist in Port Vila?
1230-1330 Lunch Break		
1330-1415	GBV and VAC Codes of Conduct	• Code of Conduct: Do we understand it? Questions on Codes of Conduct? • Read through copies of Codes of Conduct and ensure participants understand it • Potential sanctions and penalties
1415-1445	Summarize, Evaluation and Close	• Open forum to summarize and reflect on training • Workshop Evaluation (after every session) • Evaluation through post-training survey (only before worker leaves project) • Closing

Appendix E Grievance Redress Mechanism

LEPAP LEBANON ENVIRONMENTAL POLLUTION ABATEMENT PROJECT

MINISTRY OF ENVIRONMENT
LAZARIEH BLDG . BLOCK A4 . FLOOR 7 . ROOM 7-10 . BEIRUT . LEBANON
Tel: 01 976 532 . lepap@moe.gov.lb . www.moe.gov.lb/lepap

GRIEVANCE REDRESS MECHANISM

29 January 2019

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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 ESIAs or ESMPs 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;
- Through letters submitted to the LEPAP Office at the following address: Ministry of Environment, Lazarieh Building - Bloc 2A, 7th 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, 7th 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.

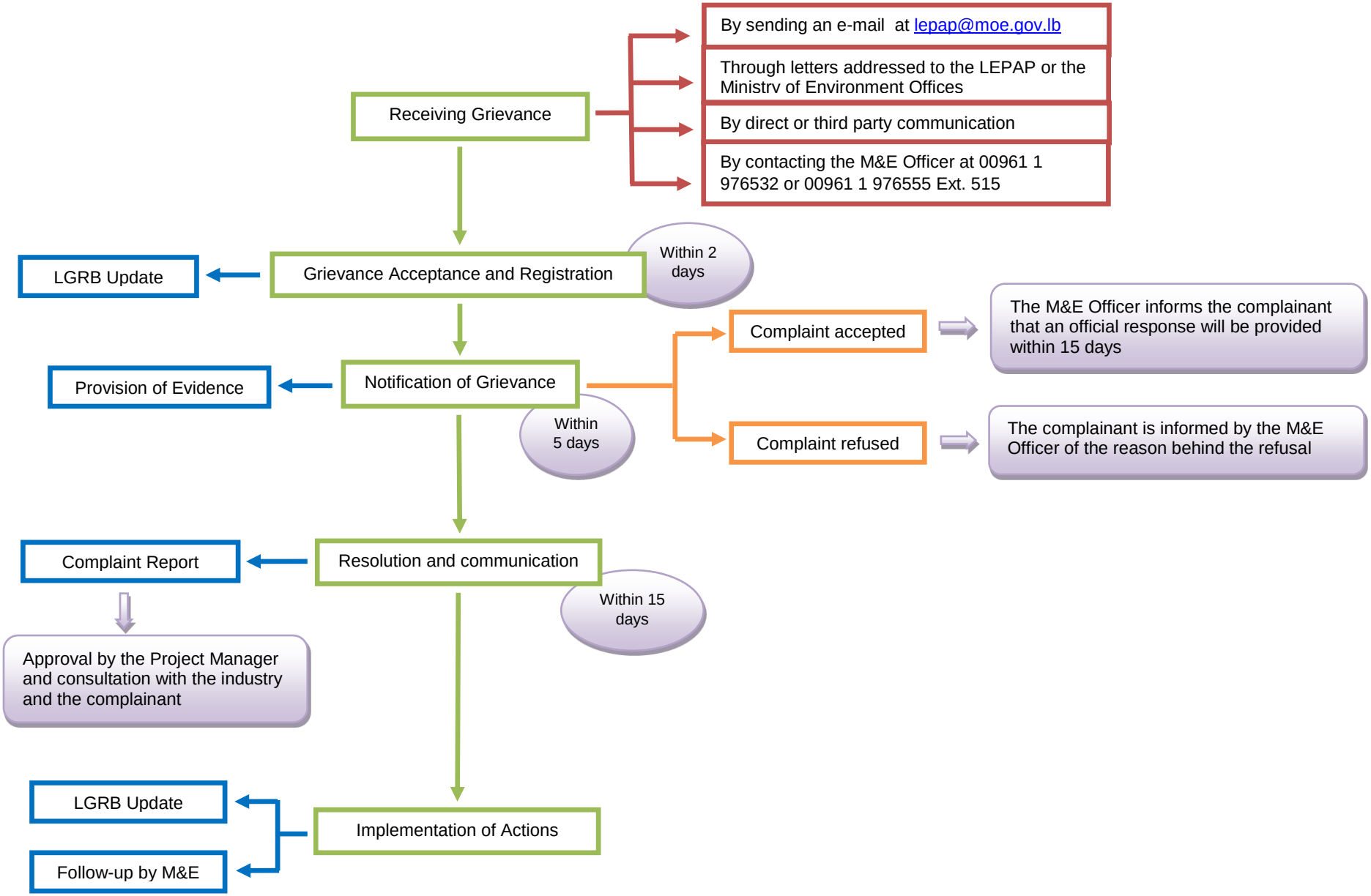
e. Actions initiated and implemented

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.


By sending an e-mail at lepap@moe.gov.lb
Through letters addressed to the LEPAP or the Ministry of Environment Offices
By direct or third party communication
By contacting the M&E Officer at 00961 1 976532 or 00961 1 976555 Ext. 515
Receiving Grievance
Grievance Acceptance and Registration
Within 2 days
LGRB Update
Notification of Grievance
Within 5 days
Provision of Evidence
Complaint accepted
The M&E Officer informs the complainant that an official response will be provided within 15 days
Complaint refused
The complainant is informed by the M&E Officer of the reason behind the refusal
Resolution and communication
Within 15 days
Complaint Report
Approval by the Project Manager and consultation with the industry and the complainant
Implementation of Actions
LGRB Update
Follow-up by M&E

ANNEX 1: LEPAP Grievance Log Template

GRIEVANCE LOG

Industry Name

No.	***About the Complainant***			***About the Complaint***				
	Name	*Position*	*GRM Adopted*	*Date Received*	*Brief Description*	*Actions taken*	*Person Responsible*	*Date Closed*

ANNEX 2: Complaint Form Template

COMPLAINT FORM

LEPAP GRIEVANCE REDRESS MECHANISM

A. CONTACT INFORMATION OF THE COMPLAINANT		
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?	☐Yes	☐No
B. SUB-PROJECT INFORMATION		
Beneficiary name :		
Type of project :		
Project location :		
C. THE COMPLAINT		
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?	☐Yes ☐No
If YES, please provide the following: (a) When, how and with whom the issues were raised? (b) Describe any response received from and/or any actions taken by the industry's GRM (c) Explain why the response or actions taken are not satisfactory	
If NO, please provide the following: a) Why not? b) How do you wish to see the complaint resolved? c) Do you have any other matters or facts (including supporting documents) that you would like to share?	

Date:
Signature of Complainant:

Please send the complaint to: LEPAP Office - Ministry of Environment,
Lazarieh Building - Bloc 2A, 7th Floor, Room 7-10/35
Beirut, Lebanon
Email: 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.

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:

1. Complaint background :	*Provide a brief description of the complainant declarations, evidences and requests.*
2. Brief on the GRM adopted :	*Provide a brief description of the GRM process adopted.*
3. Brief on the outcomes of the investigations :	*Provide the following information:* – *Date of the field visit;* – *Accuracy of the declarations;* – *Add laboratory measurements results, as needed;* – *Outcomes of the discussion undertaken with the industry representatives;* – *Additional information as needed.*
4. Proposed Solutions :	*Provide a table of the proposed next steps including, but not limited to, the following information:* – *Proposed actions;* – *Personnel in charge;* – *Expected timeline;* – *Expected cost;* – *Proposed monitoring actions.*

Signature :

Appendix F Monitoring Form

LEPAP
LEBANON ENVIRONMENTAL
POLLUTION ABATEMENT
PROJECT

MINISTRY OF ENVIRONMENT
LAZARIEH BLDG . BLOCK A4 . FLOOR 7 . ROOM 7-10 . BEIRUT . LEBANON
Tel: 01 976 532 . lepap@moe.gov.lb . www.moe.gov.lb/lepap

Monitoring Report

Name of the Industry

Date

1. **GENERAL INFORMATION :**

Type of sub-project :	
Sub-project phase :	
Date of field visit :	

a. *Brief description of the sub-project :*

b. *Brief description of the safeguard tool prepared :*

c. *Brief description of the sub-project status :*

- ***Milestones***

Activity	Expected timeline	Challenges

d. *Complaints :*

e. *Other relevant information :*

2. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Activity	Proposed Mitigation Measures	Implementation Period	Responsibility	Current Status

Additional remarks regarding the ESMP implementation:

3. COMMENTS AND RECOMMENDATIONS

Prepared by :	
Date :	

Annex 1: LEPAP Grievance LOG

LEPAP GRIEVANCE LOG

Name of the Industry

No.	***About the Complainant***			***About the Complaint***				
	Name	*Position*	*GRM Adopted*	*Date Received*	*Brief Description*	*Actions taken*	*Person Responsible*	*Date Closed*

Annex 2: Photos

Appendix G Job Description

The EMS (Environmental Management System) Officer is expected to be someone from the PMU's senior management, and should have sufficient authority and organizational influence to ensure the EMS is properly implemented. He or she should have reasonable background in both environment and finance and be able to perform the following tasks:

- Oversee the FI/PMU's E&S risk management and implementation of EMS;
- Manage resources (budget and staff) for E&S risk management and training;
- Ensure the coordination and integration of E&S risk management procedures with the FI/PMU's internal review process;
- Report any major E&S issues to MoE/WB and secure the support for and approval of E&S risk management issues by MoE/WB;
- Review and approve the FI/PMU's annual E&S performance report to stakeholders, including WB.

Depending on the FI/PMU's organisational structure and business scope, the EMS officer may be supported by one or more EMS coordinators to review or coordinate the day-to-day E&S tasks performed by other staff (i.e., credit officers, environmental and social specialists, and consultants), according to the staff roles specified in the EMS, including:

- Evaluate environmental compliance of a borrowers/sub-projects with applicable requirements during due diligence, such as site visits, collection of necessary E&S documentation (e.g., certificates and authorisations), and preparation of E&S due diligence reports (or an E&S section of the credit application);
- Ensure that all investment decisions are supported by appropriate due diligence documentation, including, but not limited to, an E&S section in each final Investment Memorandum;
- Ensure that appropriate environmental representations, warranties, and covenants are incorporated in each loan or investment agreement;
- Supervise portfolio projects' on-going compliance with the applicable requirements on a regular basis, which may include:
    - Conducting site visits, monitoring the implementation of E&S action plan (if any) by the borrowers, reviewing borrowers' annual reports, and recording borrowers' E&S on-going performance;
    - Resolving E&S issues in case of non-compliance, and where needed, preparing a time-bound corrective action plan with specific follow-up procedures.
- Prepare the FI/PMU's annual environmental performance report, based on the annual performance reports provided by its borrowers/sub-projects;
- Ensure that these procedures are implemented for each sub-project, and that records of environmental reviews (i.e., appraisal and monitoring) are maintained.

Source: Adapted from IFC (2013)

Appendix I List of Pre-Qualified National Environmental Consultants (December 2012)

مجلس الإنماء والإعمار
بيروت - لبنان

بيروت في ٢٠١٢/١١/٢٨

الرقم : ١/٦١١٧

معالي وزير البيئة المحترم

خانة الدراسات البيئية

المرجع: – كتابكم رقم ٤٥٨٥/ب تاريخ ٢٠١٢/١١/٣ المسجل لدى المجلس تحت الرقم ١٣٨٢٩/م.ر. تاريخ ٢٠١٢/١١/٢٠

بالإشارة إلى الموضوع والمرجع المبينين أعلاه،

وعطفا على كتابكم المشار اليه في المرجع أعلاه، المتضمن طلبكم تزويدكم بلائحة المكاتب الهندسية الاستشارية اللبنانية المؤهلة لدى مجلس الإنماء والإعمار لدراسة أو الإشراف على تنفيذ مشاريع في فئة الأعمال الأخرى المختلفة – خانة الدراسات البيئية، نبين أدناه اللائحة المطلوبة:

- ACE - Associated Consulting Engineers
- Al Mouhit Consulting Engineers (MCE)
- Dar Al Handassah (Nazih Taleb & Partners)
- Dar Al Handassah Consultants (Shair & Partners)
- Delta Engineering Studies
- Earth Link & Advanced Resources Development SARL - ELARD
- Ecodit Liban S.A.R.L.
- Engico Consulting Engineers
- Engineer Roger Georges Khalil
- Engineering, Design & Environmental Services - Edessa
- Envirotech Ltd.
- Information International Ltd.
- Issa Consulting
- Jouzy & Partners CEB
- Kabbara & Associates
- Khatib & Alami, Consolidated Engineering Co.

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- Kredo s.a.l.
- Lebanese Arab Co.For Eng. & Consultancy "Laceco"
- Libanconsult AGM
- Matrix Engineers
- Maurice Bonfils Architecte (MBA)
- Mazen Ramadan - Consulting Engineers
- Middle East Engineers and Architects s.a.r.l.
- Mores S.A.R.L
- Nicolas Gerges & Sons (Scte N.Gerges & Fils)
- Rafik El-Khoury & Partners Consulting Engineers
- S.E.S. Sustainable Environmental Solutions S.A.L
- Touma Engineering SARL-Engineering & Research
- TURBA Ltd

علما بأن هذه اللائحة هي عرضة للتعديل وفق المعطيات التي ترد الى المجلس من قبل المكاتب الهندسية المعنية.

وتفضلوا بقبول فائق الاحترام.

رئيس مجلس الإنماء والإعمار

نبيل عدنان الجسر

الجمهورية اللبنانية
مجلس الإنماء والإعمار

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Appendix J General Environmental Baseline Conditions in Lebanon relevant to LEPAP

The potential sub-projects vary considerably in type and scale and therefore in their potential impacts on environmental and social aspects, making determination of baseline data rather difficult. As LEPAP is a national project, the baseline section provides an overview of the quality of the environment in Lebanon, while focusing as much as possible, depending on data availability, on industrial areas where sub-projects may be implemented. This section provides an overview of air, water resources and sea-water quality, as these are the main media with relevant project interactions. It also presents an overview of wastewater and waste management and the industrial sector in Lebanon.

Ambient Air Quality

Air pollution is defined as the modification of the natural characteristics of the atmosphere by any chemical, physical or biological contaminant such as Particulate Matter (PM), Carbon Monoxide (CO), Ground-Level Ozone (O_3), Nitrogen Dioxide (NO_2) and Sulphur Dioxide (SO_2).

Sources of pressures on ambient air quality in Lebanon can be natural phenomena or anthropogenic activities such as road transportation, energy production (power plants, private generators and gas stations), industrial manufacturing processes, construction, quarries, fireworks, burning tires, open dumping and wars (MoE/UNDP/ECODIT, 2011). In 2008 a report by the WB estimated the impact of air pollution on human health in Lebanon was in the order of US$ 151 million per year. Other studies also estimated that the cost of air pollution in Beirut alone was around US$ 10 million in 2001 and that these costs are considerably higher nowadays due to an expected increase of emissions. (1.02% of the GDP) (WB, 2004).

In 2013, MoE launched Phase 1 of the national Air Quality Monitoring Network (AQMN) through five stations in Lebanon, with the support of the United Nations Environment Program (UNEP) and UNDP.

In 2017, phase 2 of the AQMN was launched with the support of the EU, and covered the installation of ten additional monitoring stations, and eight weather stations, three PM stations and one calibration station. The literature review revealed a lack of ambient air quality data for Lebanon. A summary of findings for the urban area of Beirut and the industrial North Lebanon areas is provided below and further discussed below. The results are used as a proxy for the conditions in an urban area and an industrial area of Lebanon.

Figure one shows the different pollutants measures in Lebanon and their sources.

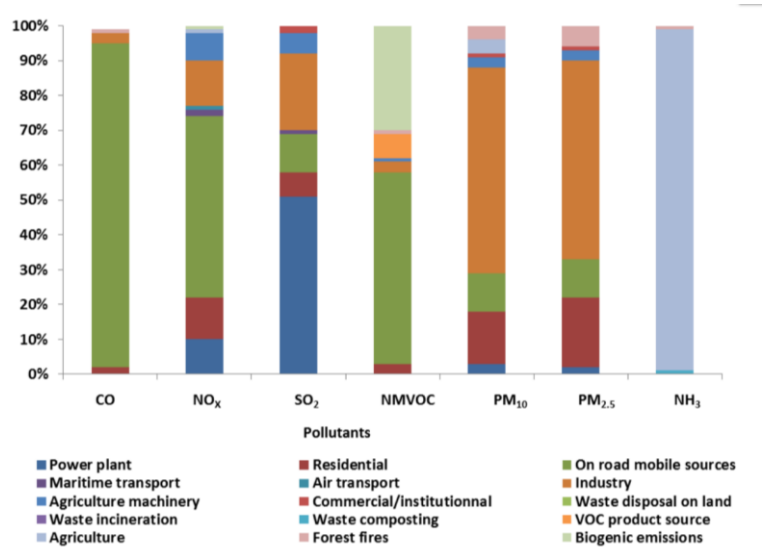


Figure 5. Emissions apportionment for the different pollutants for 2010 (Waked et al., 2012)

Atmospheric Pollution in Beirut

NO2 levels in Beirut are mainly attributed to traffic (Afif et al., 2008). The yearly average of 2005 was recorded to be 67µg/m^3. It reached its peak in December with 178µg/m3 and dropped to 17µg/m^3 in May (Afif et al., 2008). NO2 concentrations are generally within the acceptable range of allowable limits for ambient air pollutants (MoE Decision No. 52/1/1996). This is also applicable to the concentrations given in the month of May. However, exposures are significant in the month of December since the average concentration of the month exceeds the permissible exposure over a 24 hour period.

SO_2 levels in Beirut are mainly attributed to traffic and central heating burners (Saliba et al., 2006 & Afif et al., 2008). The monthly average of SO_2 concentration in samples collected from Beirut varied between 13µg/m^3 in summer 2004 and 25µg/m^3 in winter 2004-2005 (Saliba et al., 2006). Another study conducted between December 2004 and July 2006 showed a yearly average of 8.11 µg/m^3 (Afif et al., 2008). SO_2 levels measured in Beirut in both studies were below the maximum allowable limits for ambient air pollutants (MoE Decision No. 52/1/1996).

Particulate matter emissions are mainly attributed to natural and anthropogenic activities (Shaka'& Saliba, 2004). Levels of PM_{10} in Beirut varied between 20.8 and 238 µg/m^3 (monthly average) (Shaka'& Saliba, 2004). Exceedance in PM_{10} was noted in March, April and May 2003. $PM_{2.5}$ annual levels in Beirut were below IFC guideline values.

Measurements of benzene were conducted in suburban Beirut during summer 2011 and winter 2012 (Salameh et al., 2015). The levels of benzene ranged from 0.25 µg.m-3 to 7.83 µg.m-3 on an hourly basis with an average of 2 µg.m-3 over the two campaigns (Salameh et al., 2015). This observed value, although compliant with the Lebanese standards, is associated with an excess lifetime risk of leukaemia of less than 1/100,000 according to WHO standards (2000).

Water Resources

Water pollution is defined as the contamination of water bodies by chemicals or other substances present in concentrations greater than the natural conditions.

Water pollution in Lebanon is affected by many driving sources such as population growth, urbanization, economic growth and climate change. Water resources are subject to many pressures leading to deteriorating water quality. These include pressures from solid wastes, pressures from domestic and industrial wastewater and pressures from agricultural runoff (MoE/UNDP/ELARD, 2011). Raw sewage and other domestic and industrial wastes are still being discharged into water bodies in an unregulated and uncontrolled manner (MoE/UNDP/ECODIT, 2011). Bacteriological contamination is a major pollutant of most water resources in Lebanon.

Surface Water

Lebanon has 16 perennial rivers and 23 seasonal rivers. Surface water analysis shows high levels of *E.Coli* and coliforms indicating a contamination with untreated sewage (Houri & El Jeblawi, 2007; Hamze et al., 2005, MoE/UNDP/ELARD, 2011). Other pollutants include fertilizers and pesticide residues from agricultural runoff as well as heavy metals and hydrocarbons from urban and industrial wastewater (MoE/UNDP/ECODIT, 2011).

Information on whether the industrial plants are treating their wastewater prior to discharge into the respective receptors is scarce; on site pre-treatment is rare. Elevated concentrations of certain pollutants such as heavy metals and cyanide observed in the surface water bodies can be explained by discharge of industrial wastewater without prior treatment (BAMAS, 2005a, 2005b; LRA, 2007-2010; MoE/UNDP/ELARD, 2011, MoE/UNDP/ECODIT, 2011).

Additionally, several laws have been issued in the past couple years that help strengthen the enforcement of environmental regulations in Lebanon, most notably these include the air quality protection law (Law No. 78/2018), water law (Law No. 77/2018), the Integrated Solid Waste Management Law (Law 80/2018), and the hazardous waste management decree (CoM Decree 5606/2019).

Groundwater

The preponderant Lebanese aquifers are karst limestone structures featured by springs and sinkholes. However, the karst limestone is highly fissured allowing the infiltration and diffusion of pollutants from domestic, industrial and agricultural sources.

. The MoEW and UNDP's Assessment of the groundwater resources of Lebanonconducted in 2014, is considered a comprehensive and accurate assessment of the groundwater quality. |It provides baseline data through field surveys and hydrogeological reconnaissance, and it compares the baseline conditions with those assessed in the previous version in 1970 (MoEW/UNDP, 2014).

Urban expansion, and the increasing need to irrigate crops as wet periods shorten, has led to an overexploitation of wells in Lebanon. Salinity (i.e. concentrations of sodium and chloride) increases in aquifers that are over extracted. Coastal wells are generally subject to salt water intrusion, and many are being put out of service.

Additionally the recent waste crisis in Lebanon added to the water pollution through the open unsanitary dumps that spread across Lebanon following the closure of the Naameh landfill which was main landfill for Beirut and Mount Lebanon. These open dumps produced leachate that infiltrated the soil and further polluted the groundwater

Seawater

As reported in the State of the Environment Report (2010), Lebanese coastal waters receive untreated sewage from at least 53 major sewage outfalls spread along Lebanon's 240 km coastline. Coastal waters receive an estimated 162 Mm^3/year of untreated sewage, which is equivalent to 65% of the total sewage load in Lebanon (MoE/UNDP/ECODIT, 2011).

Wastewater Management

Wastewater treatment is still problematic in Lebanon. As of 2018, eight (8) medium to large wastewater treatment plants (WWTP) exist on Lebanese cost, three within North Lebanon Governorate, three within Mount Lebanon Governorate, and two others within South Lebanon Governorate. But only two are not operational yet (Jbeil and Sour)

On the Inland side, seventeen (17) WWTP are constructed. One small scale plant within North Lebanon Governorate, six small to medium size within Mount Lebanon Governorate, five small to medium scale within South Lebanon and Nabatiyyeh Governorates, and 5 medium to large size in Bekaa Governate. Only five plants are not operational yet (Safa, Barouk, Kfarsir, Zawtar and Yohmor).

The quantity of water used by the industrial sector in Lebanon ranges between 150 and 163 Mm^3 per year, equivalent to around 11% of the total annual water demand (MoEW, 2010). The projected industrial water demand in 2030 varies between 9% and 16% of the total water demand based on MoEW and World Bank estimates, respectively (MoEW, 2010; World Bank, 2010).

As per the Policy Paper on Industrial Wastewater Management and Compliance published in 2012, the most common uses of water in the industrial sector are 1) washing and cleaning, 2) cooling, 3) process uses, 4) wet scrubbing (if any) and 5) steam generation (MoE/CDR/EFL, 2012a). There is a lack of information on the quantity of water used and wastewater generated by type of industry. The 2010 SOER estimated the quantity of industrial wastewater that may contain a wide range of toxic organic and inorganic pollutants in Lebanon at 43 Mm^3/year (MoE/UNDP/ECODIT, 2011). As reported in the aforementioned Policy Paper, the Ministry of Energy and Water (MoEW) estimated that Lebanon produces around 310 Mm^3 of wastewater, 250 Mm^3 is municipal/domestic wastewater and around 60 Mm^3 is industrial wastewater.

The quality of wastewater generated from the industrial sector varies among manufacturing processes. In general, industrial wastewater may contain suspended, colloidal and dissolved (mineral and organic) solids and may be either excessively acid or alkaline (depending on the process). Industrial wastewater may contain inert, organic or toxic materials and possibly pathogenic bacteria.

Sources of data on industrial water quality include studies and audits focused on selected industrial branches. Wastewater from the food industries is highly loaded with organic compounds; the meat processing industries generate wastewater characterized by high BOD levels, total suspended solids, nitrogen and phosphorus. Beverage industries producing non-alcoholic drinks generate effluents with high BOD, COD and TSS loads. Wastewater generated from foundry processes may contain high levels of total suspended solids and heavy metals (Pierson & Pavlostathis, 2000; Roš & Vrtovšek, 2001; Chen & Seng, 2006; MoE/CDR/EFL, 2012a).

It was estimated that tanneries discharge around 40 tonnes of Chromium into the Mediterranean Sea each year. Untreated wastewater from olive mills is discharged into nearby rivers and streams (wadis) with considerable impact on receiving waters (MoE/CDR/EFL, 2012a).

Solid Waste Management

Since the closure of the Naameh Landfill in 2015, which was the main landfill for Beirut and Mount Lebanon, a waste crisis has started in Lebanon. The lack of a national solid waste management plan lead to short term and unsustainable solutions, such as open dumping and random burning, both of which leading to serious environmental and health impacts. Since then the government interfered and opened two new landfills to substitute for the closed landfill, and new locations for sanitary landfills are being searched.

Sludge Management

There is no national sludge management strategy. The feasibility of a national "waste to energy" strategy is being assessed, and if found to be feasible, could accommodate the disposal of sludge from WWTPs.

Industrial Waste Management

Lebanon produces around 50,000 tons of hazardous solid waste per year including hazardous industrial chemical waste, expired solid drugs and materials, health care waste (hazardous non-infectious waste, waste requiring special management, hazardous infectious waste, etc), persistent organic pollutants from energy sector or other sectors, and various types of sludge. However, the treatment of these hazardous solid waste in an environmental manner is non-existent, and most of these waste are disposed of in haphazard manner, with an exception to a small part of the healthcare hazardous infectious waste is treated in accordance with the provisions of Decree 13389/2004, and some types of hazardous waste that are exported in accordance with the provisions of the Basel Convention on the Control of Trans boundary Movements of Hazardous Wastes and Their Disposal (Law 389/1994).

In June 2018, the Council of Ministers (CoM) approved the Integrated Solid Waste Management Policy, whereby CDR shall be charged with:

- Rehabilitation and improving the efficiency of the Karantina and Aamroussieh sorting plants, and rehabilitation of the Coral area treatment plant as a mechanical biological treatment plant with Biodrying (MBT).
- Build a MBT plant in the Ghadir River estuary area.

As for the hazardous waste MoE, in accordance with Law 48/2017 and other environmental laws and regulations in effect, it shall take the necessary steps to build three interim storage plants for hazardous industrial waste, expired drugs, and healthcare waste (two on the coast and one inland).

Slaughterhouse Waste

The 10 main centralised slaughterhouses located in Beirut (Karantina), Bourj Hammoud, Tripoli, Baalbeck, Saida, Sour, Jezzine and Nabatiyeh are considered the main generators of slaughterhouse waste. These slaughterhouses are usually run by the municipality or by an external operator under contract to the municipality or the governor. The slaughterhouses were either primitively designed or built as temporary facilities and none of them currently provides adequate treatment of their waste (blood, internal organs and bones). The only attempt to manage slaughterhouse waste in Lebanon is in Beirut, where the municipality contracted a Lebanese waste contractor to treat the waste onsite using a double-cycle composting plant which produces an organic substrate. In 2014 the Karantina slaughterhouse was temporarily closed so that it could be renovated to meet the food safety standards, and following this closure three other slaughterhouses and a chicken farm in the south were also closed temporarily.

Lebanon's poultry industry is rather developed, producing slaughterhouse waste and poultry litter. To date, very few large poultry industries are equipped with their own rendering plant to process waste.

Smaller poultry farms are not treating their waste but recycle some of the litter onsite (MoE/UNDP/ECODIT, 2011).

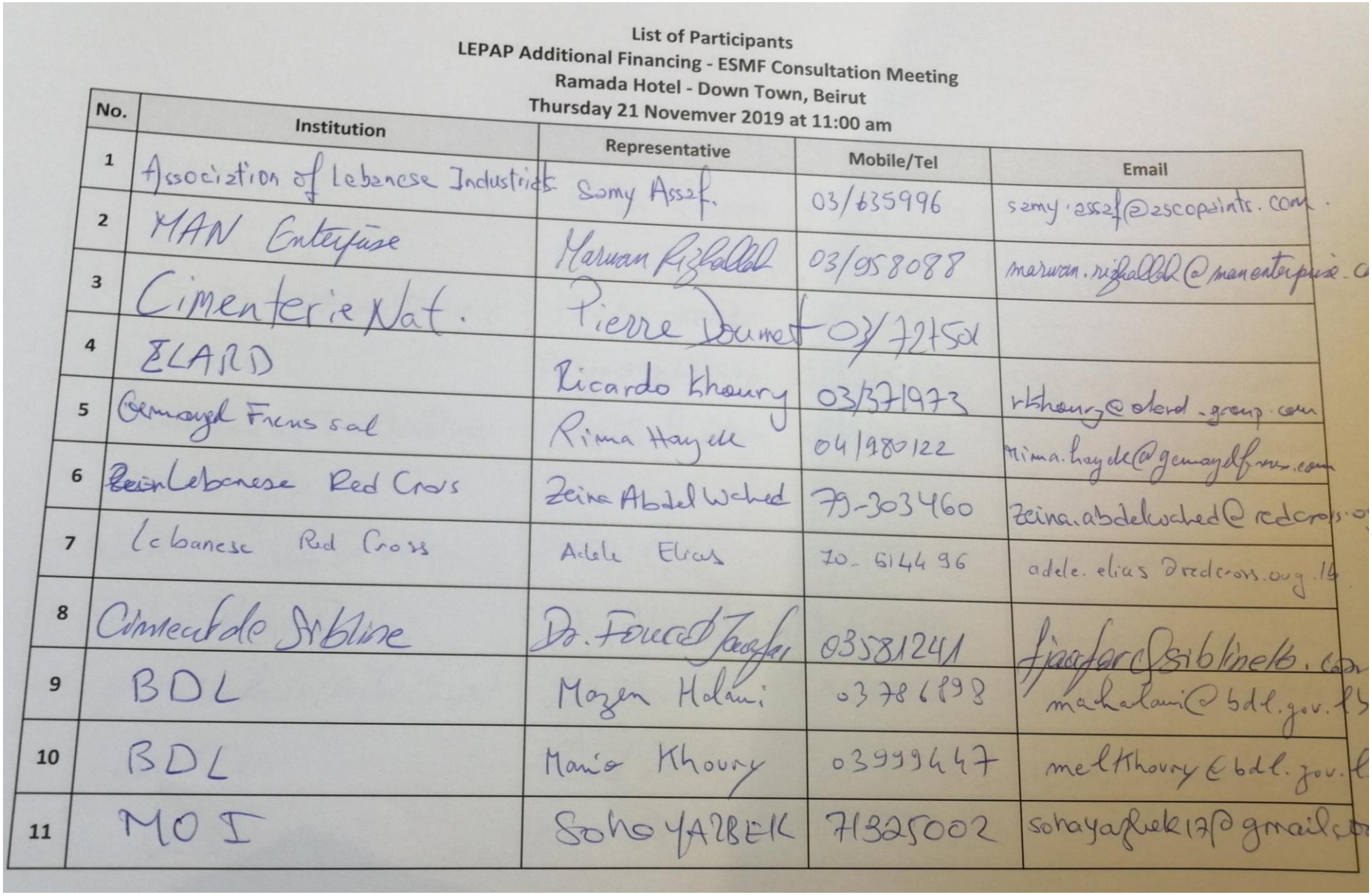
Olive Oil Waste

The production of olive oil generates two types of waste: Olive Mill Wastewater (OMW) and pomace (a solid residue also known as olive cake). OMW with high organic and phenolic content is usually disposed of in streams and sewers, affecting water and soil quality during the harvest season. The MoE has made efforts to introduce an integrated system for olive oil waste management in Lebanon through hosting the Integrated Waste Management for the Olive Oil Pressing Industries in Lebanon, Syria and Jordan (2005-2008). The cost of environmental degradation from the olive oil production sector in 2006 was estimated at 13.3 million USD including lost fishing revenues, water treatment costs and damages to natural amenities and landscape. MoE has defined environmental limit values for waste from the olive oil industry, as well as environmental guidelines for using treated OMW in irrigation. The total cost of compliance with the prescribed environmental requirements was estimated at 60,000-275,000 USD per olive mill depending on facility size and technology (MoE/UNDP/ECODIT, 2011).

Appendix K List of Participants and Stakeholders Meeting (October 25, 2019)

List of Participants
LEPAP Additional Financing - ESMF Consultation Meeting
Ramada Hotel - Down Town, Beirut
Thursday 21 Novemver 2019 at 11:00 am

No.	Institution	Representative	Mobile/Tel	Email
1	LAUMC-RH	Rita Ghoson	03.627481	rita.ghosn@laumcrh.com
2	Bankmed	Abdulrahim Kowatly	81 601300	kowatlya@bankmed.com.lb
3	CIMENTERIE NATIONALE	FOUAD SERHAL	—	—
4	Gandour	Ayman ElAgha	76 391575	aagha@gandour.com
5	Ministry of Industry	Chantal AKL	03/319438	chantalakl@yahoo.com
6	BEKTA Group			
7	Vahan-Kabakian	[illegible]	03/527641	[illegible]
8	Michel-Ange Medlej	Ministry of Energy & Water	70/083834	michelange.medlej@gmail.com
9	Doher foods (Master Chips)	Jad Chowbassi	03/922644	jadchowbassi@doherfoods.com
10	SOLUTION	Aboud Zahr	03-656203	azahr@solution-env.com
11	WB	Lama Mansour	03 777134	[illegible]



List of Participants
LEPAP Additional Financing - ESMF Consultation Meeting
Ramada Hotel - Down Town, Beirut
Thursday 21 Novemver 2019 at 11:00 am

No.	Institution	Representative	Mobile/Tel	Email
1	Association of Lebanese Industrials	Samy Assaf.	03/635996	samy.assaf@ascopaints.com.
2	MAN Enterprise	Marwan Rizkallah	03/958088	marwan.rizkallah@manenterprise.c
3	Cimenterie Nat.	Pierre Doumet	03/727501	
4	ELARD	Ricardo Khoury	03/371973	rkhoury@elard-group.com
5	Gemayel Frères sal	Rima Hayek	04/980122	rima.hayek@gemayelfreres.com
6	~~Beirut~~ Lebanese Red Cross	Zeina Abdel Wahed	79-303460	zeina.abdelwahed@redcross.o
7	Lebanese Red Cross	Adele Elias	70-514496	adele.elias@redcross.org.lb
8	Cimenterie Sibline	Dr. Fouad Jaafar	03581241	fjaafar@sibline.com
9	BDL	Mazen Halawi	03786198	mahalawi@bdl.gov.lb
10	BDL	Maria Khoury	03999447	melkhoury@bdl.gov.l
11	MOI	Soha YAZBEK	71325002	sohayazbek17@gmail.com

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Ramada Hotel - Down Town, Beirut
Thursday 21 Novemver 2019 at 11:00 am

No.	Institution	Representative	Mobile/Tel	Email
1	Phoenix Energy	Elie Njeim	03/217003	elie.njeim@phoenixlb.com
2	ELARD	Tina El-Khoury	03613231	telkhoury@elard-group.com
3	Château Ksara	Marie Claire Baboyan	03/645639	mbaboyan@ksara.com.lb
4	Lebanon Chemical Co	Antoine Aoun	03/337877	antoine.aoun@lebanonchemicals.com
5	Majdi Geaiteh			
6	Rola Saad	Bank Audi	03/921161	
7	FADI HAMZ	ESFD	70/168575	[illegible]@esfd.cdr.gov.lb
8	Amer Mroueh	ESFD	76/634505	amroueh@esfd.cdr.gov.lb
9	Farouk Merhebi	AUB	76/700320	fm39@aub.edu.lb
10	Albert Abdelnour	AUB	70/940829	aa406@aub.edu.lb
11	Librasil Mattresses	Librasil	03/838370	Mohamad_Amora [illegible]