

Public Disclosure Authorized

**REPUBLIC OF LEBANON**  
**Ministry of Economy and Trade**

**Lebanon Wheat Emergency Response Project**  
**(P178866)**

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**DRAFT**  
**ENVIRONMENTAL AND SOCIAL**  
**COMMITMENT PLAN (ESCP)**

**April 13, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Lebanon (the Borrower) will implement the Emergency Response in Support of Wheat Imports Project (P178866) (the Project), with the involvement of the Ministry of Economy and Trade (MOET) as set out in the Loan Agreement. The World Bank has agreed to provide financing for the Project “Lebanon Wheat Emergency Response Project” (P178866), as set out in the referred agreement(s).
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Borrower. The Borrower through MOET shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s), including but not limited to grievance logs.</p>	Biannual Progress Reporting throughout implementation, starting from the Effective Date.	MOET
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the World Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the World Bank within a timeframe acceptable to the World Bank</p>	MOET
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the assigned environmental and social focal point who will support the management of environmental, social and health &amp; safety (ESHS) risks and impacts of the Project.</p>	Maintain the assigned E&S focal point throughout Project implementation	MOET
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <ol style="list-style-type: none"> <li>1. Prepare and disclose Environmental and Social Management Plan (ESMP) that includes requirements for (i) dust control, (ii) health and safety risks including fire safety, (iii) pest management, (iv) road safety, (v) COVID19 prevention measures, (vi) food safety standards (vii) GBV/SEAH Prevention (v) social risk management.</li> <li>2. Incorporate the ESMP requirements in the framework agreement between MOET and local importers, to require local importers to ensure that those measures are implemented by contractors.</li> <li>3. Implement ESMP and monitor the Framework Agreement with millers to ensure poor and vulnerable people to have access affordable bread</li> </ol>	<ol style="list-style-type: none"> <li>1. Before signing framework agreements with local importers as disbursement condition .</li> <li>2. Before signing the Framework Agreement</li> <li>3. Throughout the project implementation</li> </ol>	MOET
1.3	<b>TECHNICAL ASSISTANCE</b>	Throughout Project implementation.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Ensure that the consultancies, studies ), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.		
1.4	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements for the implementation of Contingent Emergency Response Component, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&amp;S) instruments which may be required for activities under the Contingent Emergency Response Component of the Project, in accordance with the CERC Manual and the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	<p>a) The adoption of the CERC manual, in form and substance acceptable to the World Bank is a withdrawal condition under Section E of Schedule 2 of the Loan Agreement for the Project.</p> <p>b) Adopt any required E&amp;S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&amp;S instrument is required. Implement the E&amp;S instruments in accordance with their terms, throughout Project implementation.</p>	MOET
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare, disclose, adopt and implement an LMP for the Project integrated with the ESMP, incorporating the relevant aspects of ESS2 including through, inter alia, a) implementing adequate occupational health and safety measures; b) setting up grievance mechanisms for the workers; c) carefully select the primary suppliers and ensure no child labor and forced labor are engaged.</p> <p>Maintain the existing employment arrangements for government staff and adapt MOET’s existing GM to manage grievances of the workers under the project.</p> <p>Implement the requirements of the ESS2 as part of the LMP which will be integrated in the ESMP as mentioned under action 1.2</p>	Prepare LMP integrated with ESMP before project activities begin. Implement throughout project implementation	MOET
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Adapt existing grievance mechanism to manage grievances of all project workers identified under the Project.</p>	As indicated in Section 2.1	MOET

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Prepare and implement the ESMP (Action 1.2) to ensure dust emissions are adequately managed	To be prepared part of the ESMP and to maintained throughout project implementation	MOET
3.2	<b>PEST MANAGEMENT</b> Assess pest management procedures as part of the ESMP, mentioned under action 1.2, and prepare measures to be adopted while fumigating grain shipment in transit between the receiving port and mills. Ensure that pest management procedures to be included in the framework agreement between MOET and local importers, and cause local importers to ensure that those measures are implemented by fumigating contractors	To be prepared part of the ESMP and to maintained throughout project implementation	MOET
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>COMMUNITY HEALTH AND SAFETY</b> a) Implement World Bank guidelines on COVID 19 safety and other community health and safety standards, as applicable, which will guide all interactions during implementation. Prepare This will be part of ESMP as mentioned under action 1.2.  b) Ensure wheat grains meet food safety standards as required by the ESMP mentioned under action 1.2	Throughout the project implementation	MOET
4.2	<b>SEA AND SH RISKS</b> The GBV/SEAH risk assessment is low. Prepare respective GBV/SEAH risk mitigation measures for low risk as per the Good Practice Note and incorporate in the ESMP as mentioned under section 1.2	Throughout project implementation	MOET
4.3	<b>TRAFFIC SAFETY</b> Assess traffic safety procedures as part of the ESMP, mentioned under action 1.2, and recommend measures to be adopted while transporting the wheat between the receiving port and mills. Ensure that traffic safety procedures to be included in the framework agreement between MOET and local importers, and cause local importers to ensure that those measures are implemented by transportation contractors	To be prepared part of the ESMP and to maintained throughout project implementation	MOET
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY – NOT APPLICABLE</b>			
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES – NOT APPLICABLE</b>			
6.1	<b>REQUIREMENTS FOR PRIMARY SUPPLIERS</b> Cause primary suppliers to clarify the source of wheat and declare that it has not been produced from areas where significant degradation of natural habitats took place	Before signing framework agreements with local importers	MOET
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES – NOT APPLICABLE</b>			
<b>ESS 8: CULTURAL HERITAGE – NOT APPLICABLE</b>			
<b>ESS 9: FINANCIAL INTERMEDIARIES – NOT APPLICABLE</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Implement the Stakeholder Engagement Plan (SEP) prepared for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p> <p>Regular stakeholder engagement will be important to meet the intermediate results indicators. Various stakeholders will be engaged and consulted throughout the implementation of the project activities in accordance with ESS10 provisions. Active efforts will be made to seek stakeholders’ feedback on the consistent availability of wheat. The modes of engagement and the frequency of engagement will be determined by the needs of the project as well as the needs and interests of different stakeholders. Information about the project will be made available to stakeholders through the MOET website.</p> <p>Conduct inclusive consultations with vulnerable groups</p>	<p>Maintain throughout implementation and reported bi-annually.</p> <p>before the start of relevant project activities.</p>	MOET
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Adopt MOET’s existing formal grievance mechanism for uptake of grievances which are handled by a dedicated office. Document grievances in a formal manner and ensure timelines are clearly specified to close complaint cases.</p> <p>There are multiple uptake channels at the MOET including through telephone, email, online form on the MOET’s website and through an alternative application form that can be downloaded again from the MOET’s website. These grievance redressal mechanisms are consistent with requirements of ESS 10 and will be used to receive, process and address project related grievances received from complainants.</p>	<p>Update to specify clearly timelines before commencement of project activities.</p> <p>Maintained throughout implementation.</p>	MOET
<b>CAPACITY SUPPORT</b>			
CS1	<p>Provide the following Trainings for:</p> <ul style="list-style-type: none"> <li>• MOET assigned E&amp;S focal point on the World Bank Environmental and Social Framework and effective operation of a grievance mechanism</li> <li>• MOET on stakeholder mapping and engagement</li> <li>• MOET on emergency preparedness and response</li> </ul>	After Effective date	MOET