

# The LEBANESE Republic

## Emergency Crisis and Covid-19 Response Social Safety Net Additional Financing (P178075)

### ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

**April 19 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Lebanese Republic (hereinafter the **Borrower**) is implementing the Lebanon Emergency Crisis Response Social Safety Net Project (P173367) (the **Project**), with the involvement of the Presidency of the Council of Ministers (PCM), the Ministry of Social Affairs (MoSA) and the Ministry of Education and Higher Education (MEHE) as set out in the Loan Agreement. The International Bank for Reconstruction and Development (the World Bank) acting as the administrator has agreed to provide financing and additional financing for the Project as set out in the referred agreement(s). This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
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(s). This ESCP version dated April 19, 2022, replaces the ESCP version of the Parent project dated December 9, 2020.
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 Bank and the Borrower, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Borrower will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the Borrower. The Borrower will promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<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, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, labor management procedures, and functioning of the grievance mechanism(s)</p>	<p><i>Starting from the Effective Date, every six-months during the Project's implementation in conjunction with the Project's progress reports.</i></p>	CMU
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, affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH).</p> <p>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><i>Immediately, and no later than 48 hours after such incidents or accidents, report to the Bank's Project Team Leader.</i></p> <p>Prepare an incident/ accident report within 10 business days as per the Bank's request.</p>	CMU
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>The contracted firms (GRM support, communications firm, etc.) are required to provide monthly monitoring reports to the Borrower. These reports would be submitted to the Bank by the Borrower upon request.</p>	<p><i>Monthly reports</i></p>	CMU
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management of E&amp;S risks and impacts of the Project, including (1) the contracting of a firm to establish a robust Grievance Redress Mechanism (GRM), (2) a pro-active communications outreach program, (3) social workers with relevant qualifications and incentivized to do the case management works, (4) a Social specialist to follow up and monitor the risks and mitigations as assessed in the SIA, (5) considering hiring a Gender-Based Violence (GBV) specialist to prepare a GBV Action Plan and monitor and mitigate associated risks accordingly, all with relevant qualification and acceptable to the Bank.</p>	<p><i>Establish an organizational structure and maintain the social specialist who has been hired for the project in March 2022 throughout Project implementation. (The social specialist is the same as the Lebanon Emergency Crisis and COVID19 Response Social Safety Net Project (ESSN)).</i></p>	CMU
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>Update, disclose, adopt and implement the Social Impact Assessment (SIA) actions and measures for the Project in accordance with ESS1 in a manner acceptable to the Bank. Exclude all unacceptable activities presented in the SIA.</p> <p>Monitor implementation of the measures in the SIA and update mitigation measures based on changing conditions. Update SIA to include feedback from consultations. The newly hired Social specialist will ensure regular monitoring, mitigation, documentation and reporting of social risks.</p>	<p><i>Update the SIA which was cleared and disclosed under the parent project in April 2021 to include feedback from consultations one month after project effectiveness. The updated SIA will apply to both the parent project and the AF.</i></p> <p><i>Adopt the updated SIA and implement the action plan throughout Project implementation.</i></p>	CMU (Social Specialist)
1.3	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications in the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. This applies also to the firms recruited to provide GRM support and communications.</p>	<p><i>Prior to the preparation of procurement documents.</i></p> <p><i>Supervise contractors throughout Project implementation.</i></p>	CMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>a) Ensure that the Contingent Emergency Response Component Manual (CERCM) includes a description of the ESHS assessment and management for the implementation of component 5, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&amp;S) instruments which may be required for activities under component 5 of the Project, in accordance with the CERCM 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) <i>The adoption of the CERCM in form and substance acceptable to the Bank is a withdrawal condition under Section F of Schedule 2 of the Loan Agreement for the Project.</i></p> <p>b) <i>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.</i></p>	CMU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms</p>	<p><i>Adopt the LMP which was cleared and disclosed in July 2021. Implement the LMP throughout Project implementation</i></p>	CMU
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The Contracted workers' contracts should also be in line with the requirements of ESS2.</p>	<p><i>Adopt the Grievance mechanism which has been developed under the Parent Project for the Project workers as per the LMP disclosed in July 2021 and maintain it throughout Project implementation.</i></p>	CMU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
	Currently not relevant to the project		
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			

4.3	<b>SEA AND SH RISKS</b>  Prepare and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH	<i>Prepare the SEA/SH Action Plan one month after the effective date which will be applicable to both the parent project and the AF and thereafter implement the SEA/SH Action Plan throughout Project implementation</i>	CMU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
	Currently not relevant to the Project		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
	Currently not relevant to the Project		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	Currently not relevant to the Project		
<b>ESS 8: CULTURAL HERITAGE</b>			
	Currently not relevant to the Project		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Currently not relevant to the Project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b>  Update, adopt and implement the revised Stakeholder Engagement Plan (SEP) for the Project and AF, 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.	<i>Update the revised SEP under the AF to reflect outcome of inclusive consultations one month after the effective date and thereafter implement the SEP throughout Project implementation. The updated SEP applies to both the parent project and the AF.</i>	CMU (Social Specialist in coordination with communications firm and MoSA)

<p><b>10.2</b></p>	<p><b>PROJECT GRIEVANCE MECHANISM:</b></p> <p>Adopt, maintain and operate a grievance mechanism, as described in the SEP. Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Bank.</p>	<p><i>The Project Grievance Mechanism is operational and adequately resourced at Impact. The Grievance Mechanism is part of the SEP and will be maintained throughout Project Implementation</i></p>	<p>CMU. The GM will be managed and monitored by a Third Party, under a firm contract.</p>
<p><b>CAPACITY SUPPORT (TRAINING)</b></p>			
<p><b>CS1</b></p>	<p>Training may be required for PIU staff, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> <li>• Stakeholder mapping and engagement</li> <li>• Specific aspects of social assessment, including GBV SEA/SH risks, impacts and mitigation measures</li> <li>• OHS measures related to COVID-19 as per the national health requirements</li> <li>• Grievance redress mechanism</li> <li>• GBV and SEA/SH</li> </ul>		