

Public Disclosure Authorized

Creating Economic Opportunities in Support of the Lebanon National Jobs Program

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Environmental and Social Systems Assessment

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Acronyms

BdL	Banque Du Liban
CAP	Compliance Action Plan
CDR	Council for Development and Reconstruction
CEA	Country Environmental Analysis
COM	Cabinet of Ministers
DGA	Directorate General of Antiquities
DLI	Disbursement-linked Indicator
DLR	Disbursement-linked Result
DLIPS	Department of Labor Inspection and Safety
EA	Environmental Assessment
ECC	Environmental Compliance Certificate
EHS	Environmental Health and Safety
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ESSA	Environmental and Social Systems Assessment
GRM	Grievance Redress Mechanism
HCC	Higher Council for Customs
HCP	Higher Council for Privatization and PPP
IEE	Initial Environmental Examination
IVA	Independent Verification Agency
LEPAP	Lebanon Environmental Pollution Abatement Project
MOA	Ministry of Agriculture
MOC	Ministry of Culture
MOE	Ministry of Environment
MOET	Ministry of Economy and Trade
MOF	Ministry of Finance
MOL	Ministry of Labor
MOT	Ministry of Telecommunications
MOU	Memorandum of Understanding
MSME	Micro, Small and Medium Enterprises
NEO	National Employment Office
NJP	National Jobs Program
OHS	Occupational Health and Safety
OP	Operational Policy
PAP	Program Action Plan
PCR	Physical Cultural Resources
PDO	Program Development Objective
PEU	Program Executing Unit
PforR	Program for Results
PMO	Prime Minister's Office
POM	Program Operational Manual
PPE	Personal Protection Equipment
PPP	Public Private Partnership
RA	Results Area
SC	Inter-Ministerial Steering Committee
SEA	Strategic Environmental Assessment
SEZ	Special Economic Zone

TA	Technical Assistance
TOR	Terms of Reference
TSEZ	Tripoli Special Economic Zone
TSEZA	Tripoli Special Economic Zone Authority
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
WBG	World Bank Group
WWTP	Waste Water Treatment Plant

Executive Summary

Introduction

The Government of Lebanon has launched the Lebanon National Jobs Program (NJP) with the support of the World Bank \$400M *Creating Economic Opportunities in Support of the Lebanon National Jobs Program* (hereafter called the PforR or the Program). The Program fosters medium and longer-term job creation in Lebanon, addressing key issues that can help promote stability and inclusion, while also promoting economic growth and good governance.

This Environmental and Social Systems Assessment (ESSA) aims to identify social and environmental risks and opportunities related to the PforR and to assess the Government of Lebanon's capacity to mitigate risks and take advantage of opportunities. This is the final version of the ESSA and incorporates comments from consultations held in Beirut and Tripoli and comments received from online consultations.

The PforR Scope, Objective and Key Results

The PforR will contribute to the NJP's objective to address challenges to high-quality, inclusive job creation in Lebanon. The NJP is structured across three integrated Results Areas, each of which involves activities designed to address specific aspects of the jobs challenge, and to complement activities under the other Results Areas:

1. Laying the Policy Foundations for Jobs: The first Results Area focuses on establishing a more conducive environment to promote private sector investment and job creation, and to eliminate barriers that prevent certain groups from accessing job opportunities.
2. Catalyzing Job Creation through Trade and Investment: The second Results Area mobilizes private sector investment, promotes exports, and improves productivity in targeted sectors in order to facilitate job creation.
3. Connecting Youth and Women to Jobs: The third Results Area provides support to women and youth who are seeking jobs or are trying to start small enterprises.

The Program Development Objective (PDO) of the PforR *is to improve economic opportunities for targeted beneficiaries in Lebanon*. In the context of this Program:

1. *Economic opportunities* are defined at three levels: (i) at the macro level, in terms of measures considered “fundamentals” that would improve the environment for private investment and benefit firms, as measured by the implementation of the new PPP law; adoption of a new telecoms licensing regime (i.e. firms benefitting from improved internet access), simplification of customs procedures (i.e. firms face faster and easier processes for imports and exports), passage of Secured Transactions and Insolvency regulations and establishment of a movable assets registry (i.e. individuals and firms have easier access to finance); (ii) at the level of firms, increased private sector finance to cooperatives/clusters and, firms receiving matching grants, and increased occupancy in TSEZ; and (iii) at the level of individuals, improved labor market outcomes amongst Targeted Beneficiaries as they are placed in wage-employment jobs (e.g. counseling, training, intermediation, etc.) or supported to become entrepreneurs (e.g. business development services and financing).
2. “Targeted Beneficiaries” include two categories of beneficiaries:
 - Firms, particularly SMEs: This group will benefit from the: (i) transversal investment climate interventions in Results Area 1; and (ii) TSEZ and VC activities in Results Area 2.

- Individual beneficiaries, particularly Lebanese youths aged 18-34 and women (18-45), and Syrian refugees. These groups will benefit from activities in Results Area 3, which are: (i) the active labor market programs for Lebanese; (ii) the vocational training programs for Syrian refugees in accordance with Lebanese Laws and Regulations; and (iii) the entrepreneurship grant and business development services for Lebanese.

The PforR supports implementation of the Government’s NJP across the three Results Areas, as shown in table below.

TABLE 1: RESULTS AREAS AND DISBURSEMENT LINKED INDICATORS (DLIs)

Result Area	DLI	Amount (US\$m)	Justification for DLI selection
RA1: Enhancing the Environment for Private Investment	DLI 1: Operational PPP program	\$70m	Establishing a sufficiently resourced and technically capable PPP unit (DLR 1.1) is an indispensable milestone toward effective PPPs. Completing five feasibility studies on Capital Investment Plan (CIP) and other projects (DLR 1.2, scalable) will then provide sufficient basis to enable two PPP contracts to be signed by the government and private investors.
	DLI 2: Financial Sector Development to improve lending to SMEs	\$45m	The DLI measures actions that could shape a more conducive environment for MSME lending. The approval of implementing regulations to strengthen the credit infrastructure (DLR 2.1-2.2) would establish a more robust insolvency regime and allow for the use of moveable collateral in securing loans, and remove an important barrier to MSME lending, especially to women. The Movable Asset Registry (DLR 2.3) is essential to making the policy change effective. Finally, the DLI rewards the increase in lending through the number of loans using movable asset registered at the registry (DLR 2.4, scalable).
	DLI 3: Improved trade facilitation environment	\$25m	The DLI measures steps that can lead to an improvement in Lebanon’s trade facilitation environment. It recognizes adoption of the Customs Strategic Plan (DLR 3.1) as a critical starting point. The ultimate outcome is measured as an improvement in the Distance to Frontier score in the ‘trading across borders’ component of Doing Business (DLI 3.2, scalable).
RA2: Catalyzing Job Creation through Trade and Investment in Lagging Regions	DLI 4: Increased access to high-speed broadband in lagging regions	\$50m	The DLI recognizes the importance of a new telecoms licensing regime based on non-discriminatory principles (DLR4.1) to strengthen competition and facilitate private sector access, and imposes a market test on its impact on broadband by disbursing against new broadband subscriptions achieved through FTTC and FTTH technologies in lagging regions (DLR 4.2, scalable).
	DLI 5: New investments established in TSEZ	\$65m	The DLI bases payments on actions that are indispensable to the establishment of the SEZ (DLRs 5.1-5.2), and on a market test that measures investor’s signing lease agreements to establish in the SEZ (DLR 5.3, scalable). This, therefore, targets the commercial viability of the zone and its success in attracting investment (and, indirectly, job creation). Finally, DLR 5.4 (scalable) targets job creation for Syrian refugees in

			TSEZ construction projects in accordance with Lebanese Laws and Regulations.
	DLI 6: Increased investments in targeted sectors through value chain (VC) development	\$40m	The DLI is structured to incentivize effective implementation of the value chain support program (DLR 6.1, scalable); it also sets an incentive for private investment leveraged from the market (DLR 6.2, scalable).
RA3: Connecting Women and Youth to Jobs	DLI 7: Improved labor market outcomes amongst Targeted beneficiaries	\$65m	The DLI targets effective implementation of the ALMP program to support Lebanese Targeted Beneficiaries (DLR 7.1, scalable), the provision of vocational training to Syrian refugees in accordance with Lebanese laws and regulations (DLR 7.2, scalable), and an output (DLR 7.3, scalable) – Lebanese beneficiaries placed in employment.
	DLI 8: Entrepreneurship opportunities created for women and youth	\$20m	The DLI first targets a critical enabling result, the successful contracting of intermediaries to deliver the grant program (DLR 8.1, scalable) and an outcome of interest, namely beneficiary entrepreneurs leveraging additional private financing (DLR 8.2, scalable), as a measure of success.
	DLI 9: Gender-based policy making for increased women’s economic empowerment supported	\$20m	The DLI targets the implementation and analysis of 8 household and employer surveys (DLR 9.1, scalable), it supports steps towards informing the policy dialogue on women’s economic empowerment in Lebanon, including setting up a gender database to build gender-disaggregated data established at the OMSWA (DLR 9.2) and the launch of a pilot based on a technical study/assessment to increase the access to childcare provision implemented by the OMSWA (DLR 9.3).

The implementing agencies of the PforR are listed in the following table. Given the cross-cutting nature of the jobs agenda, several agencies will be involved in implementing the Program. The project design mitigates the complexity this implies by ensuring that each DLI is the responsibility of a specific agency who has the executive accountability to deliver on that DLI. Table 7 summarizes the responsible agencies by Results Area and activity. Dedicated staff will be needed for activities that are new and where the implementing agency does not have existing capacity. This is expected to be the case for MOET, NEO, and HCP – details are provided in the PAP.

TABLE 2: IMPLEMENTING AGENCIES

Results Area	Activity	Implementing agency (partners)
RA1: Enhancing the Environment for Private Investment	Development of PPP program	HCP
	Financial sector development	PMO (BdL)
	Telecommunications development	MOT
	Customs reforms and trade facilitation	HCC (MOF/MOET)
RA 2: Catalyzing Job Creation through Trade and Investment in Lagging Regions	Targeted value chain development	MOET
	Matching grants for value chains	MOET (Kafalat)
	Tripoli Special Economic Zone development	TSEZ (CDR)
	Labor Force Surveys	CAS

RA3: Connecting Women and Youth to Jobs	Strengthening and modernizing active labor market programs	NEO
	First-time jobseekers program	NEO
	Entrepreneurship program	MOET
	Improving gender-based policy making for increased women’s economic empowerment and launch of a pilot to improve women’s access to childcare	OMSWA

A Program Executing Unit (PEU) will be established and maintained at the Ministry of Finance (MOF) throughout the implementation of the Program. The PEU functions as the secretariat of the Steering Committee (see below) and is responsible for: (i) the overall management, coordination, reporting, monitoring, and evaluation of Program implementation, including Program fiduciary, social, and environmental management; (ii) hiring and interfacing with the Independent Verification Agency (IVA); (iii) carrying out Annual Performance Assessment; (iv) carrying out the technical audits; (v) facilitating financial audits for the Program, all in accordance with the Program Operational Manual (POM). In addition, the PEU will carry-out inter- ministerial and inter-agency coordination on the Program policy and technical agenda.

Environmental Systems Assessment

The Program will provide an enabling environment for investments that would create jobs and improve market competitiveness. The majority of the Program interventions would be small scale (such as entrepreneurship support up to US\$ 15,000) or medium scale (such as matching grants US\$ 10,000-250,000 to firms and cooperatives in value chains). There will be also relatively large-scale infrastructure investments such as a priority PPP infrastructure project(s), investments in broadband infrastructure, and the establishment of the TSEZ.

Expected environmental effects by Results Area

Under Results Area 1, activities will support the technical design and contracting of two PPP investments. The exact projects benefitting from PforR financing under the PPP component are not defined at this stage, however, the HCP is considering support to infrastructure investments in transport, water supply and sanitation, energy, telecommunications, and solid and hazardous waste management. Some of these investments will not qualify for support under the Program as they could be associated with significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people. To ensure no such projects are supported, the HCP will screen investments against the Program environmental and social exclusion criteria. The IVA will ensure that screening has taken place.

Examples of PPP investments that could be eligible for Program financing include improvement of two existing airports, sewerage infrastructure and small wastewater treatment plants, and telecommunication data centers and infrastructure. The construction of such infrastructure is typically associated with some temporary environmental impacts and risks such as dust emissions, noise, emissions from construction vehicles and machinery, disposal of construction waste, disturbance to traffic, and health and safety risks. Such impacts/risks could be prevented/minimized by implementing adequate environmental mitigation measures during construction. During operation, impacts/risks will differ according to the type of investments (e.g. airports improvements would lead to higher traffic of passengers and waste generation; wastewater infrastructure will be associated with effluent and sludge management issues; buried telecommunication infrastructure will cause limited dust/noise during maintenance and repair). Impacts related to those infrastructure works will be identified through the environmental assessment instrument that will be prepared as part of the national system.

Furthermore, under Results Area 1, activities to support an enhanced business environment will facilitate establishing new SMEs, which could involve establishing new industrial facilities or expanding

existing ones. Such facilities will generate different types of waste (solid waste, wastewater discharges, and air emissions) that varies according to the type and scale of the facility. It is expected that impacts and risks of such facilities would be minor, but support to some activities could also lead to moderate or substantial risks. Such impacts will be identified and mitigated. Such impacts will be identified and mitigated through SMEs preparing environmental assessments in compliance with national system requirements.

Under Results Area 2, there are also environmental risks under activities supporting the telecommunications sector and the Tripoli Special Economic Zone (TSEZ). The risks and impacts of the broadband infrastructure will mainly take place during construction and maintenance activities (dust, noise, emissions from machinery, construction waste management, health and safety aspects and impacts on traffic). As mentioned above, such impacts could be mitigated by the timely adoption of adequate mitigation measures.

The TSEZ will include infrastructure works and industrial/commercial facilities, therefore impacts related to construction and to the development of industrial zones as described above are expected. However, in the case of the TSEZ, infrastructure and facilities will be concentrated within a limited geographic area (55 ha), so the cumulative impacts and risks would be relatively higher. Currently the TSEZ Authority is preparing a masterplan and a Strategic Environmental Assessment (SEA), as required by Decree 8213/2012. The scope of the SEA includes identifying different environmental aspects focusing on assessing the cumulative impacts of the development on the local environment and infrastructure. The SEA has already commenced prior to the masterplan so that early environmental and social findings would inform the masterplan. Those early findings are included in a baseline report already prepared and it identified a number of issues that should be respected during development of the masterplan including:

- a) The zoning of the TSEZ should consider the impacts of a neighboring solid waste disposal site. Adequate fencing and setback should be considered. Activities of processing and storage of edible products should be as far as possible from this site.
- b) The drainage network of TSEZ should separate clean storm water from wastewater so as not to discharge shock loads to the receiving wastewater treatment plant. The TSEZ facilities should abide with influent standards set by the WWTP and should provide pre-treatment if necessary.
- c) The masterplan should include an integrated approach to waste management including source separation for municipal, recyclable and special wastes for separate collection of products. The masterplan should recommend treatment and disposal options.
- d) Power demand to be calculated so that suitable power alternatives are addressed, including connection to the city grid and maximizing the use of solar energy so as to minimize the need/capacity of power generators that would be procured.

The SEA recommendations will be put in place during the preparation of TSEZ environmental regulations and standards. The SEA will inform the masterplan on: eligible and noneligible investments (all investments with high environmental and social risk will be screened out), development limitations according to the assimilative capacity of the local environment and planning requirements of the zone.

Under Results Area 2 there will be investments in value chains in selected sectors, with a focus on agribusiness and ICT services. The exact interventions are not currently identified and will be identified during implementation after consultations with the private sector. Examples for the matching grants that could be provided to cooperatives and firms may include improving storage of agriculture products, supporting climate resilient agriculture activities, supporting Eco-Labeling for agriculture products, supporting ICT service coverage, providing training to the hospitality SMEs. The environmental impacts of typical agriculture project that involves farming activities are related to unregulated use of irrigation water, which may lead to impacts on water resources, and unregulated use of pesticides, which could include use of banned pesticides. The typical impacts of such interventions are minor to moderate (matching grants will be in the range from \$ 10,000 to \$ 250,000) and will be subject to the environmental assessment instrument identified by the national

system in case of agroindustry investments, and will be subject to licensed irrigation and use of registered pesticides for small farming activities that are not subject to environmental assessment Decree. Screening out of interventions of high environmental and social significance will be also applied.

Under Results Area 3, workers and entrepreneurs will be qualified and placed in the labor market, therefore the impacts will be mainly related to Occupational Health (OHS) risks correspondent to the type of employment. OHS risks could be significantly minimized if workers are aware of such risks and could effectively mitigate those risks by following adequate measures. Such measures are included as part of the training requirements for those workers as further detailed below.

The Program will also have some environmental benefits such as:

- a) Supporting firms in agribusiness value chains (Results Area 2) to raise environmental standards and certify compliance with global standards, including obtaining Eco-Labeling, which will potentially lead to reducing the use of agrochemicals. There could be also some value chains supporting climate resilience including new seeds varieties and techniques that could reduce water and chemicals use.
- b) Providing training on OHS as a requirement of the training program for improving the skills of the labor under Results Area 3, so that general OHS awareness and knowledge is built in the Program supported areas. The objective is to make sure that beneficiaries under this Results Area will be trained on minimizing OHS risks related to their field of expertise.

Assessment of Existing Environmental System

The environmental regulatory system in Lebanon is comprehensive and covers different environmental aspects related to the Program interventions. The environmental expertise in the country is very strong and the registered environmental consultancy firms have good capacity. Civil society and environmental NGOs are also very active, and the media has strong interest in environmental issues. However, the monitoring and enforcement are lacking due to the limited manpower available to implementing agencies and the spread of unregulated/unlicensed activities. The following aspects of the environmental system have been assessed:

- Environmental Assessment: Regulated by Law 444/2002 and Decrees 8633/2012 (for EIA), Decree 8213/2012 (for SEA), Decree 8471/2012 (for environmental compliance) and several Ministerial Decisions that regulate the process. The Law requires that project proponents in public and private sectors should carry out EIA for any project that is likely to cause negative impacts on the environment, and the EIA Decree clarifies which projects are subject to an EIA, and to which level of details, according to a screening system provided in the Annexes of the Decree. The Lebanese EIA system is comparable with international systems (such as the World Bank Operational Policies (OPs) and European Union Directives). The main gap of the system is that there is no requirement for consultation/disclosure for projects of the moderate risk category.
- Standards for ambient environment and pollutants emissions: Generally, the environmental quality standards are comparable with the Environmental Health and Safety (EHS) Guidelines of the World Bank Group (WBG). Some of the standard limits are closer to the interim targets, rather than the guideline figures; however, such differences are not expected to have considerable impacts with regards to the Program interventions.
- Occupational Health and Safety: The laws and regulations cover different aspects of OHS, however the system suffers from different weakness in terms of monitoring and inspection which lack sufficient manpower, at the level of the Ministry of Labor (MOL), systematic guidance and checklists and planning and targeting of priority areas. The OHS system shall be improved through measures to improve the capacity of MOL, and to improve awareness and provide training to workers benefiting from the Program. Those measures are part of the Program design in Results Area 3.

- Natural habitats: The legal framework for protection of natural habitats is quite comprehensive, and protected areas are provided with means for preservation. However, the main threats to natural habitats are unregulated developments and activities (such as unregulated hunting and informal developments). A strong civil society and improved political stability mitigates against such threats and reduces the risks of unregulated/unlicensed activities.
- Physical Cultural Resources (PCRs): The legal framework is comprehensive and provides adequate protection to registered and known PCRs. The challenge would be from unregulated developments, especially regarding unknown PCRs which would be mitigated by adopting proper chance find procedures.
- Agriculture and irrigation: The use of water for irrigation is subject to Law 221/2000, where abstraction of irrigation water from rivers and groundwater is not allowed without license from the Ministry of Energy and Water. For the use of pesticides, Ministry of Agriculture has a registry of permissible pesticides, that are not banned due to their toxicity, and according to Decision 546/1 no packaging, selling or distribution of pesticides is allowed except after being registered and analyzed. The unregulated irrigation (especially from groundwater) and the use of unregistered pesticides are the main gaps in the environmental system related to farming.
- Compliance with Environmental Regulations: Decree 8471/2012 requires industrial establishments to obtain an Environmental Compliance Certificate (ECC), and a deadline was given to industries under different risk categories to reach full compliance by 2020. The compliance system was further improved by establishing a specialized department of environmental prosecutors and judges by Law 251/2014. However, it is still believed that there still important gaps in actual enforcement of environmental standards especially at the level of relatively small-scale facilities. It is expected that gradual improvements will occur as the above grace periods approach.

Social Systems Assessment

Overall social risks are moderate. Moderate risks are associated with Results Areas 1 and 2. Under Results Area 1, support to PPPs will include technical assessments, tendering, and contracting of two pilot projects. Under Results Area 2, these risks are associated with labor risks in the TSEZ. All other activities have low or no directly attributable social risks.

Cumulative social impacts of this Program are expected to be positive. In particular, the Program addresses key constraints to increasing employment in Lebanon through support to policy development, support to firms and sectors with high potential for job creation, and by directly supporting vulnerable groups including women, youth and refugees. The Program will benefit these groups by decreasing unemployment and promoting entrepreneurship, activities which are expected to have repercussions on local communities in lagging regions. These activities will directly reduce the vulnerability of these social groups and could also have indirect impacts on social cohesion. Activities to support the business environment and financial sector will also promote transparency in the sector, thereby also increasing the ability of Lebanese of all backgrounds to benefit from private sector development.

Expected Program Social Impacts by Results Area

Results Area 1 – This Results Area largely supports the implementation of reform actions. **Distributional impacts of this Results Area are likely to be positive**, as they reduce barriers to trade through customs reforms, increase access to credit for Micro, Small and Medium Enterprises (MSMEs) and women through financial sector reforms, and support expanded private sector and PPP investment in economic infrastructure. Reforms can contribute to greater investment in critical public and social infrastructure. The reforms intend both to provide a foundation for the private sector to thrive while also opening up these sectors to a broader range of actors. In fact, reforms that increase access to credit for MSMEs and women clearly intend to make the Lebanese private sector more inclusive.

Moderate social risks under Results Area 1 are related to PPP investments. One of the Disbursement Linked Results (DLRs) expected under this Results Area will support two PPPs being contracted. High risk PPP investments will be screened out, but projects having moderate social risks, including risks such as land acquisition and labor influx will be eligible for support. Land acquisition and/or livelihoods impacts, *if any*, are expected to affect less than 100 people in total per PPP investment. Labor influx is not expected to be significant, as most possible PPPs either do not create large numbers of jobs during construction, create very short-term jobs during construction that are unlikely to attract workers from faraway communities, or are expected to hire only local workers. Social risks such as these, and any others that are identified will be managed by building the capacity of the HCP, the implementing agency for these activities, on social and environmental risk management, and by putting in place measures, outlined in the POM, to address any gaps between the Lebanese legal framework for land acquisition and the core principles outlined under the Bank Policy Program for Results Financing. The HCP will hire specialist consultants to assess social risk for every PPP project in their portfolio and will have a social specialist (half-time) to follow up on the implementation of social risk management measures recommended by specialist consultants. The HCP will also have a Grievance Redress Mechanism (GRM) to collect and respond to grievances and feedback from citizens.

Results Area 2 – This Results Area supports a broad range of activities, including implementation of reforms, infrastructure investments, matching grants, and technical capacity building. Activities to support the expansion of the broadband network will have low levels of social risk. These activities will not require land acquisition and are not expected to have permanent impacts. Temporary livelihood impacts on informal vendors are possible but not expected. If such impacts were to be identified, vendors would receive assistance to relocate temporarily their businesses. Under this Results Area, the most important (yet still moderate) social risks are related to labor rights and conditions in the TSEZ.

The TSEZ is expected to provide jobs to Lebanese and Syrian workers, in accordance with Lebanese Laws and Regulations, during its construction and operational phases and can also hire other foreign skilled workers if there is such a need. The risks arise from the limited capacity of the Ministry of Labor and TSEZ Authority (TSEZA) to monitor labor conditions. However, the TSEZA, with technical advice from the Bank, will be developing bylaws and regulations that establish labor regulations that protect workers as per the recommendations outlined in the ESSA. The TSEZ Masterplan will also be drafted in line with this ESSA. These measures, measures for monitoring of labor conditions that will be outlined in the POM, and the requirement for TSEZA to include a social specialist tasked with monitoring labor conditions, mitigate against labor risks in the TSEZ. In addition, the TSEZ will set up a GRM to collect and respond to grievances from workers in the zone, contractors, tenants, and any citizen that wants to provide feedback.

The TSEZ is expected to employ approximately 8,000 individuals when it is fully functioning. Although this could result in labor influx, the Program has chosen to support the TSEZ precisely because it would largely create employment in Tripoli. Lebanese and Syrians already living in Tripoli are expected to make up the work force for the TSEZ, with skilled foreigners being hired as needed. Although there is no data on the exact number of foreigners or Lebanese and Syrian workers expected to arrive to work in the TSEZ from outside of Tripoli, the risks related to labor influx are considered to be moderate. This is because the metropolitan area of Tripoli has a population of over 1 million people and the city could easily accommodate workers coming from outside. However, the POM will establish a mechanism to monitor for negative labor influx impacts and all workers, whether local or foreign, will be required to sign a code of conduct outlining their expected behavior inside the zone and when relating to nearby communities. The TSEZA social specialist will also hold regular meetings with communities surrounding the TSEZ to make sure that the TSEZ Authority has information on potential negative impacts related to labor influx.

Value chain support programs have moderate to low social risks. The level of risk is related to the vulnerability of workers that specific value chains may attract. Agribusiness value chains, for example, have been chosen because of their potential for job creation among the vulnerable, including refugees. However, vulnerable individuals are also more easily hired into jobs and businesses with poor working conditions and can also more easily become victims of human trafficking. To prevent supporting businesses that benefit from

these practices and to encourage better labor practices and protection of vulnerable people in the supported sectors, the MOET will screen for labor and social risks and will consider ineligible any businesses where working conditions for vulnerable individuals do not meet good practice standards on payment of fair wages, working hours, abiding by the minimum age to work, or other criteria as outlined in the POM. Matching grants supporting value chains will require that businesses commit to upholding key standards on social and labor risk management, as outlined in the POM, and a MOET staff member will be assigned to monitor for social risks during implementation. A simple GRM, consisting of a widely publicized hotline and an address to send written complaints, will also be put in place. This GRM will also take grievances from entrepreneurship support activities.

Value chain support programs are also expected to have positive social impacts. Public-private dialogue forums will help establish dialogue between government institutions and the private sector, contributing to improved social exchange. Matching grants will be provided to support cooperatives and firms operating in lagging regions, where Syrian influx is greatest and social tensions between refugees and host communities are highest.

Results Area 3 – This Results Area is expected to have positive impacts on the employment of Lebanese women and youth and potentially Syrian refugees, in accordance with Lebanese Laws and Regulations, affected by the Syrian refugee crisis. By design, these activities promote social inclusion. Because the activities focus on those affected by the Syrian crisis, there is also an expectation that they would foster social cohesion. In particular, by helping Lebanese citizens get jobs, there is a chance of reducing grievances that these individuals may have due to the perception that Syrians are taking their jobs. By helping Syrians get vocational skills, the Program will also help prevent a lost generation among the Syrian population and help prevent grievances. However, for the impacts on social cohesion and social inclusion to materialize, the Program will need to be transparent about its criteria for targeting and targeting needs to be carried out effectively. If targeting is not carried out transparently, there is a small risk that divisions between social groups would be exacerbated. A GRM will also be out in place in NEO to address grievances related to these activities.

Assessment of the Existing Social Risk Management System

Three aspects of Lebanon’s social risk management system are described in the document, as they are most relevant to Program-supported investments.

- **Land acquisition and resettlement.** Lebanese legislation provides clear guidance for land acquisition and resettlement. Expropriation is guided by Expropriation Law No. 58 which indicates the State may expropriate rights only when it is to be declared in the public interest, and against payment of a prior and equitable compensation. The Tenancy Law states that where expropriation causes loss of tenancy, expropriation commissions divide awards between landlords and tenants according to the economic value of the tenancy, enabling tenants to secure alternative housing by rental or down payment for purchase. There are several gaps when it comes to land acquisition systems in Lebanon and the Core Principles outlined in the Bank Policy Program for Results Financing. There is no requirement to consult affected people before expropriation or resettlement, yet there is no prohibition to holding such consultations, and these sometimes take place. Under Lebanese legislation, compensation is determined by an Expropriation Commission based on prevailing market rates and not on the full replacement cost of assets. The Lebanese law of expropriation only compensates those with legal rights. However, mechanisms exist that protect various forms of customary rights made on a case by case basis to the Expropriation Commission. In practice, since squatters cannot be evicted without an order from the governor, resettlement is most often done through amicable negotiation, by agreeing on a level of compensation or inducement that will encourage voluntary departure. People are compensated for lost livelihoods but do not receive assistance for restoring their sources of livelihood.
- **Rights of the forcibly displaced.** Lebanon has not ratified the 1951 United Nations (UN) Convention on Refugees and has not adopted any domestic legislation specifically addressing the rights of refugees. Not

being legally recognized as refugees means that legally they are treated in the same way as are any other foreign nationals. However, there is a Memorandum of Understanding (MOU) signed between the Government of Lebanon and the UN High Commissioner for Human Rights (UNHCR) that provides a mechanism for the “issuing of temporary residence permits to asylum seekers.” The domestic legislation that governs refugees in Lebanon is the Law Regulating the Entry and Stay of Foreigners in Lebanon and their Exit from the Country, which was enacted in 1962 (1962 Law). The relevant provisions of this law are articles 26, 31, and 32.¹ In practice the country accepts Syrians fleeing from the war and considers them ‘displaced persons.’ The Government also respects the customary international law principle of nonrefoulement, and under human rights law, not to return anyone to a place where they would face a real risk of persecution, torture or other ill- treatment, or a threat to life.²

- Labor laws. The 1946 Labor code is the key legislation outlining labor rights. The labor code requires that workers have contracts, requires payment of a minimum wage, overtime, provides for paid leave, establishes maximum work hours, and minimum age for work. The code also forbids discrimination in the workplace. Refugees are limited to working in certain sectors as per Decision No. 1/218. Decision no. 1/49 stipulates that the number of foreign workers (regardless of nationality) per company must not exceed 1 foreigner per 10 Lebanese workers. The main weaknesses of the Lebanese labor system are in the implementation of the laws and international agreements that are in place and especially the capacity of the MOL to carry out supervision activities.
- Grievance redress. Complaints about government activities are usually handled by specific government institutions. For this Program, it is relevant to note that the Ministry of Environment has five means to make environmental complaints. In the case of social complaints, the hotline at the Ministry of Labor, was recently upgraded to become available for all workers 24/7. There is also the General Directorate of General Security hotline, which was established in 2014, and is available 24/7 in Arabic. The General Directorate of General Security’s hotline is expected to receive questions and complaints about a variety of topics, but relevant to this program, is expected to handle reports about human trafficking. The weakness in grievance redress mechanisms in the country is that they are often not widely trusted or used, and when complaints are received, they are often not recorded or reported on.
- TSEZ law. The TSEZ laws and regulations are of special importance for the Program. The TSEZ Law establishes certain exceptions to requirements to follow the national labor legislation. In particular, the Law states that minimum wage regulations can be superseded in the TSEZ by contractual arrangements between workers and employers, and that workers and employees would be exempt from all Social Security Provisions. In addition, the Law states that workers shall receive ‘health benefit plans that are comparable or superior to those provided by the National Security Fund.’ The TSEZ bylaws and regulations, however, have not yet been fully developed, and will be developed as part of this Program. This is an opportunity to ensure such bylaws and regulations are best practice in Lebanon. The TSEZA has committed to following the guidance on strengthening these laws provided in this document, including strengthening contractual arrangements to ensure that working conditions, including wages and benefits, provide workers with at least as much protection as does the national legislation.

In general, and with the exceptions noted above, the legislation that is in place supports social risk management. However, implementation of legislation, and in particular labor laws, need to be strengthened for these systems to be considered strong. Capacity building measures for implementation of the national legislation and strengthening of institutional systems are described in the recommendations section.

¹ Library of Congress (2016). *Refugee Law and Policy: Lebanon*. Available at <https://www.loc.gov/law/help/refugee-law/lebanon.php>

² Ibid.

Eligibility of Program Investments

The interventions of the Program should not cause significant adverse environmental and social impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people. All such interventions should be screened out from all Program investments. As a general rule, all interventions included in Annex I of Decree 8633/2012 or those interventions in Annex II that area located in sensitive areas (natural protectorate – habitats of endangered species – wetlands – natural shores of the sea, rivers and springs) will be excluded. Interventions that require physical displacement or economic displacement of more than 100 people (per intervention, at the activity level) will also be excluded. Physical or economic displacement will be screened out completely in all activities not implemented by the MOT or HCP. All activities requiring land acquisition would be excluded with the exception of land acquisition required for PPP investments. In addition, MOET’s support to value chains will exclude all support to businesses that do not meet the conditions for adequately managing social risks and having good labor practices, as defined in the POM. As TSEZ will have cumulative impacts, a screening form, following the requirements of the Bank Policy Program for Results Financing was prepared at an early stage of the Program preparation, and it was concluded that if high-risk industries³ are excluded the investment in TSEZ is eligible for financing under the Program. During the Program implementation, if any activity that is not included in Decree 8633/2012 lists, or included in Annex I list but the correspondent implementing agency believes that the location and scale of this activity do not fall under the exclusion definition of the PforR policy, a screening report, evaluating project activities and location against the exclusion criteria, should be prepared and approved by the IVA before counting this investment within the results of the correspondent DLI. Although included in Annex II of Decree 8633/2012, all tobacco related manufacturing and trading should be excluded from the Program interventions due to their serious health impacts on end users.

Recommendations

The recommended measures are included in the Program DLIs, the PAP legal covenants and the Technical Assistance provided to the Program as follows.

DLIs:

Environmental and social measures will be part of the verification of achievement of DLRs and DLIs. In particular:

- DLI 5: TSEZ laws, regulations and bylaws will be prepared and issued following the recommendations in this ESSA and agreed upon in the POM. This will include: developing best practice bylaws and regulations on labor (including OHS, labor influx, labor conditions, and labor rights) that provide at least as much protection to workers as the national legislation, and also protects surrounding communities from the impacts of labor influx; clear environmental regulations and bylaws that screen out activities with significant impacts on the environment, as defined in this document; provides for a fully staffed Environmental Department at the TSEZ that includes at least one full time Senior Environmental Specialist and one full time Senior Social Specialist (with an expertise on labor); includes audit/enforcement protocols. The achievement of this DLI will depend on the adequacy of those regulations in addressing the environmental and social issues raised by the SEA and the adequacy of the institutional framework for managing those issues. This will be evaluated by the IVA and the Bank team will make sure that those measures are effectively implemented.

³ Those industries are included in Annex 1 of Decree 8633 (EIA Decree) and includes certain types of industries in the food (example: sugar industry), paper (examples: pulping), leather (example: tanneries), oil (example: refineries), chemicals (example: chemical fertilizers), metals (example: iron and steel), building materials (example: gypsum) and transportation machinery (example: car manufacturing).

- DLI 7: To mitigate against OHS and other labor-related risks that workers trained under Results Area 3 could face depending on the industry they are trained for, RA 3 will include OHS and labor rights training. The IVA will make sure that this is included as part of the achievement of DLI7.
- The Bank team will review the ToRs and minimum qualifications of the IVA to make sure the above two tasks are effectively implemented.

Program Action Plan (PAP) legal covenants:

The PAP includes measures to ensure recommendations in this ESSA are applied in the implementation of the Program. The PAP includes:

- Measures to ensure that the recommended institutional setup for management environmental and social issues is in place.
- A requirement to adopt a POM, cleared by the Bank, that will outline the activities, processes and standards that will need to be met for environmental and social risk management. The POM will include sections on the selection of program investments, minimum standards for social and environmental risk management and supervision, reporting on social and environmental risk management at the implementing agency and Program level, mechanisms for disclosure, consultation and grievance redress, and specific screening forms and risk management plans.

More specifically, the POM will include the following measures to address **environmental risks**:

- Procedures for applying the exclusion criteria for high risk projects including PPP projects, SMEs and investments in value chains and TSEZ. For PPP projects the HCP will apply the screening criteria for the selected PPP investment. TSEZ will do the same during the licensing of TSEZ investments, where high-risk industries will be excluded. For other Program interventions (value chains and matching grants) the PEU will carry out the screening of investments. This will include a process for applying the exclusion criteria for projects involving social and labor risks that cannot be adequately mitigated, or where the implementing agencies do not have the capacity to mitigate risks. The definition of such projects will also be included in the POM. Screening instruments for different implementing agencies will be included as annexes.
- No new project under Results Areas 1 and 2 (such as PPP projects, beneficiaries receiving matching grants), subject to environmental assessment per Decree 8633/2012, should be approved by the implementing agency except after the approval of the Ministry of Environment (MOE) on the environmental assessment instrument. Approved instruments should be disclosed at the website of the correspondent implementing agency of Program, noting that project description details, that could affect competitiveness of project proponent, could be excluded. For small farming projects (under matching grants) that are not subject to environmental assessment per Decree 8633/2012, the beneficiary should only use licensed source of irrigation and registered pesticides. Copies from irrigation license and pesticides invoices from registered distributors should be submitted to the implementing agency as part of the application requirements.
- Existing projects/facilities, to be supported under Results Area 1 and 2 (such as beneficiaries receiving matching grants), that are subject to ECC (Categories 2 and 3 of Decree 5243/2001) should have a valid ECC from MOE to be eligible for Program support. Also, Category 2 and 3 facilities that started operation through the Program support (after having an approved IEE) should obtain ECC after one year of operation. The ECC will include OHS aspects as part of the compliance requirements.
- Existing facilities, to be supported under Results Area 1 and 2, not subject to ECC should be committed to apply MOE conditions relevant to their type of industry. For small farming projects (under matching grants) that are not subject to ECC Decree, the beneficiary should only use licensed source of irrigation and registered pesticides. Copies of irrigation license and pesticides invoices from

registered distributors should be submitted to the implementing agency as part of application requirements. Technical assistance will be provided for improving environmental compliance of program beneficiaries.

- All construction contracts should have a condition for adequate protection of PCR chance finds and prompt notification to the implementing agency of these finds and any cutting of trees during site clearance should be permitted by Ministry of Agriculture with adequate compensatory measures.

The POM will include the following measures for managing **social risks** in the following implementing agencies:

PEU

- The TOR for the social specialist.
- Requirements for aggregating reports on social risks.
- Accountability and reporting mechanism for social risk management at the Program level.

HCP

- Processes for screening for social risks, including processes for identifying and managing any potential labor (including labor influx) issues related to PPPs.
- Processes for land acquisition and livelihood restoration that are acceptable for the two PPPs contracted as part of the Program and recommended for all HCP activities.
- The TOR for the social specialist.
- A description of the implementing mechanism for the HCP's GRM.
- Requirements for reporting on social risks.

MOT

- Processes for screening for social risks and in particular temporary or permanent livelihood impacts related to the expansion of the broadband network.
- Processes for consultation and livelihood restoration that are acceptable to address any potential livelihood impacts.
- The TOR for the social consultant.
- A description of the implementing mechanism for the MOT's GRM.
- Requirements for reporting on social risks.

TSEZ

- Minimum criteria for worker rights to be established and clarified in the TSEZ bylaws and regulations. These minimum criteria will provide worker protections at least as good as those provided by the national legislation on labor.
- Draft text to be included in contractor and tenant contracts establishing minimum working conditions required in the TSEZ.
- Processes for monitoring working conditions in the TSEZ and for addressing contractors and tenants that do not provide proper working conditions to their workers.
- Guidelines for assessing and mitigating against any negative impacts of labor influx. A labor influx management plan will also be part of the POM and will include a worker code of conduct.
- The TOR for the social consultant.
- A description of the implementing mechanism for the TSEZ's GRM.
- Requirements for reporting on social risks.

MOET

- Minimum labor conditions and social risk management capacity expected for cooperatives and firms supported under the value chain support program.
- Processes for screening for social risks and labor conditions during the proposal evaluation process, including a screening form.
- Draft text to be included in matching grant contracts requiring that supporting cooperatives and firms maintain adequate worker protections and report on any social or labor risks identified.

- Process for targeting and communications mechanisms for potential beneficiaries (both for value chain support program and entrepreneurship)
- A description of the implementing mechanism for MOET's GRM.
- Requirements for reporting on social risks.

NEO

- Description of capacities that trainees are expected to acquire on OHS and labor rights.
- Process for targeting and communications mechanisms for potential beneficiaries
- A description of the implementing mechanism for NEO's GRM.
- Requirements for reporting on social risks.

Technical Assistance (TA)

As part of its implementation support, the World Bank will provide technical assistance to the agencies implementing the Program, including:

- Capacity building to support Program beneficiary to comply with environmental, social and OHS requirements, and provide capacity building to MOL to improve their process of ensuring the Labor Code is followed. This could take different forms, such as training and providing relevant consultancy assignments. The details of this will be agreed with MOE and MOL according to the need during the implementation of the TA.
- MOET and NEO will receive technical assistance on beneficiary targeting and communications with beneficiaries.
- All agencies putting in place GRMs will receive technical assistance to put these in place.

Institutional structure for environmental and social management

Each of the implementing agencies will be responsible for implementing the above measures in their correspondent Results Area:

PEU: One full time Environmental Specialist and one half-time Social Specialist will oversee the social and environmental performance of the Program-supported activities in the PEU. The Terms of Reference (TORs) for these individuals will be developed in the POM. The PEU will also oversee and provide support for the implementation of different measures by different implementing agencies (except HCP and TSEZ). S/he will ensure that Initial Environmental Examinations (IEEs) and ECCs, if any, include measures for minimizing risks on OHS, natural habitats and Physical Cultural Resources (PCRs). S/he will also ensure that construction contracts for all works includes the Environmental Management Plan (EMP) measures in IEEs and chance finds procedures of PCRs. The environmental specialist should conduct frequent field visits to projects to ensure that environmental measures are implemented on ground as documented in Environmental Assessment (EA) instruments. The PEU's social specialist will have expertise on social risk management and worker protections. The specialist will make sure that contracts and grants being issued by all relevant implementing agencies include measures to protect workers and that Program investments are monitored to ensure compliance with national labor legislation. The specialist will also work with implementing agencies to help acquire permits for non-Lebanese nationals.

The HCP: The HCP will hire at least one full time Environmental Specialist and at least one part-time Social Specialist to manage environmental and social risks within its whole portfolio. While these individuals are expected to manage risks related to the two PPPs that will be contracted as part of the Program, these individuals are also expected to mainstream and supervise social and environmental risk management throughout the HCPs portfolio.

The TSEZ Authority: The TSEZ Authority will have an Environmental and Social Risk Management Unit that will monitor these risks in the TSEZ. The Unit will include at least one full-time Senior Environmental

Specialist who will monitor the environmental performance of tenants and make sure they comply with the environmental standards of the zone. The Unit will also include at least one full-time Senior Social Specialist who will monitor social risk management in the zone, both during its construction phase and during operations. The Senior Social Specialist will have expertise on labor monitoring and labor rights and will also be responsible for managing the GRM in the Authority and for monitoring the impacts of labor influx. The Senior Social Specialist is expected to lead regular consultations with tenants, contractors, workers, and surrounding communities, and to report on all aspects of his/her work.

MOT: Activities implemented by the MOT are not expected to require full time social or environmental expertise. To ensure that the expansion of the broadband network does not negatively impact individuals, permanently or temporarily, the MOT will contract a person with environmental and social screening expertise to screen for impacts before construction works start. If any impacts are identified, including temporary impacts, the MOT will hire a consultant to develop a plan to mitigate against such impacts following the core principles of the guidance provided in the Bank Policy Program for Results Financing. The screening mechanism will be described in the POM. In addition, the MOT will assign a staff member to lead on the implementation of a GRM and report on grievances.

MOET: Activities implemented by the MOET are not expected to require full time social or environmental expertise. To ensure that activities supporting value chains do not inadvertently support cooperatives and firms with poor history of social risk management or poor labor conditions, a screening mechanism will be included in the proposal process for grants/matching grants that are part of this activity. The screening mechanism will be described in the POM. In addition, the MOET will assign a staff member to lead on the implementation of a GRM and report on grievances.

NEO: Activities implemented by the MOET are not expected to require full time social or environmental expertise. TA will be provided to help NEO develop and put in place mechanisms within its programs to manage communications with beneficiaries, have clear and fair targeting of beneficiaries, and to have mechanisms to include the vulnerable. NEO will assign a staff member to operate a GRM and report on the grievances received and resolved, as per guidance in the POM. NEO will also be providing its targeted beneficiaries training on labor rights and will be coordinating with OHS Department of MOL to provide OHS training.

IVA: The IVA will be responsible for ensuring that results have been achieved as per the standards of the Bank. In the case of DLRs 1.2 and 5.1, the IVA will only determine that these results have been met if they meet the social and environmental standards as outlined in this ESSA, in the SEA and in the POM.

Public Consultations

Consultations to present the main findings of the ESSA were conducted on the 26th and 27th of February 2018. The objective was to present the key gaps and recommendations of each of the environmental and the social assessments. For the best representation of beneficiaries and stakeholders, the consultations were held over three sessions; two sessions were conducted in Beirut and included (i) government/implementing agencies, and (ii) national civil society representing environmental and social NGOs, and targeted beneficiaries. The third session took place in Tripoli to include key stakeholders representing civil society, international and local organizations and local governance.

Prior to the consultations, the draft ESSA was shared with invited delegates giving them the time to review before the consultation meetings. During the consultations, the team presented the overall program, and the findings of the Economic and the Social assessments conducted. In addition to consultation meetings the Draft ESSA was disclosed at the Bank External Website.

Many of the comments received during the consultations were related to the Program design and its monitoring during implementation. There were also many environmental and social comments related to different aspects

of the system. The team took note of all the comments and took them into consideration in the Program documents including in this ESSA. Minutes of these consultations can be found in the Annex.

The draft ESSA was also posted for consultations in the World Bank's global site and on the World Bank's Lebanon country office site.

Summary of Risks and Recommendations

DLI / Social and Environmental Risks	Institutional and Legal Framework to Manage Risk	Identified Gaps	Gap-filling measures & Recommendations
Results Area 1: Laying the Policy Foundation for Jobs			
<p>DLI 1: Operational PPP program DLR #1.1: Three decrees addressing staffing, administrative and financial functions for HCP approved by COM.</p> <p>DLR # 1.2: Five feasibility studies based on Capital Investment Plan (CIP) and other projects completed and approved in accordance with PPP Law.</p> <p>DLR # 1.3: Two contracts for PPP projects, selected and tendered under the PPP law, are approved by the COM, are signed between the private investors and the Borrower</p> <p><i>Environmental risks/impacts are typically construction-related and during operation the risks/impacts will be according to the type of infrastructure</i> <i>Social risks are related to potential land acquisition required for investments.</i></p>	<ul style="list-style-type: none"> - Environmental law and related Decrees, OHS law and Decrees, and institutional framework - Land acquisition legislation and institutional arrangements - PPP Law and decrees 	<ul style="list-style-type: none"> - Some PPP projects could have of significant risk/impacts - No requirements for consultation of IEEs - MOE and MOL have little capacity to monitor EMPs and OHS conditions - Livelihood restoration measures in legal framework do cover compensation for crops, lost rent, lost assets but do not ensure livelihoods have been restored. 	<p>Environmental and social screening mechanism applied to screen out investments with high environmental and social risks</p> <p>Consultation and disclosure requirements are included in IEEs ToRs</p> <p>Monitoring of projects to be done by HCPP staff (refer to the below cell)</p> <p>Complementary measures for will be put in place to make sure any affected people are consulted, their assets are valued at full compensation costs, that informal land users are compensated for assets and assisted in their resettlement, and that livelihoods are restored. Specific measures will be included in the POM.</p>
	Implementing Agency: HCP	<p>HCPP does not have environmental or social specialists on staff.</p> <p>Currently no GRM</p>	<p>Recommendation to hire:</p> <ul style="list-style-type: none"> - 1 Full-time environmental specialist - Half-time social specialist <p>GRM to be put in place in the HCP</p>
<p>DLI 2: Improved credit infrastructure for increased finance to SMEs: Activities are expected to increase access to finance to SMEs and women. DLR # 2.1: Implementation Regulations for the Insolvency Law are approved by COM.</p>	<ul style="list-style-type: none"> - Environmental law and related Decrees, OHS law and Decrees, and institutional framework 	<ul style="list-style-type: none"> - Some SMEs could have significant risks/impacts - No requirements for consultation of IEEs 	<p>Environmental and social screening mechanism applied to beneficiary SMEs to screen out high environmental and social risk activities</p>

Summary of Risks and Recommendations

DLI / Social and Environmental Risks	Institutional and Legal Framework to Manage Risk	Identified Gaps	Gap-filling measures & Recommendations
<p>DLR # 2.2: Implementation Regulations for the Secured Transactions Law are approved by COM.</p> <p>DLR # 2.3: Moveable Asset Registry is established and is operational</p> <p>DLR # 2.4: Number of loans secured with moveable assets registered at the Moveable Asset Registry is equal to at least 300,000</p> <p><i>For DLR 2.4 there will be some environmental risks/impacts related to construction/expansion of new SMEs and the operation related risks will be according to the type of SMEs</i></p> <p><i>No social risks identified.</i></p>		<p>- Some SMEs do not have EA instrument or EMP.</p> <p>- MOE and MOL has little capacity to monitor EMPs and OHS conditions.</p>	<p>Beneficiary SMEs will comply with national systems, including having, as required, an approved EA instrument (for new SMEs) or ECC (for existing SMEs)</p> <p>Providing TAs for SMEs for complying with Environmental and OHS regulations. PEU to follow up on compliance</p> <p>Consultation and disclosure requirements are included in IEEs ToRs</p>
	Implementing Agency: PMO (BdL)	No Environmental expertise at PMO and BdL.	PEU to have an Environmental Specialist to follow up on related issues
<p>DLI 3: Improved trade facilitation environment: Reforms to customs are expected to increase the efficiency and transparency of the system.</p> <p>DLR # 3.1: A Customs Strategic Plan, incorporating a new organizational structure, the new Custom Law, a single window and modernized risk management system is approved by the CoM.</p> <p>DLR # 3.2: From the baseline of 59.17% (2018) Lebanon's Distance to Frontier (DTF) rating in Doing Business 'Trading Across Borders' indicator increases by an additional 5 percentage points.</p> <p><i>No social or environmental risks identified.</i></p>	NA	NA	NA
	Implementing Agency: HCC – MOF/MOET	NA	NA

Summary of Risks and Recommendations

DLI / Social and Environmental Risks	Institutional and Legal Framework to Manage Risk	Identified Gaps	Gap-filling measures & Recommendations
Results Area 2: Catalyzing Job Creation through Trade and Investment in Lagging Regions			
<p>DLI#4: Increased access to broadband internet</p> <p>DLR # 4.1: Decree establishing a new telecommunications licensing regime is approved by the Council of Ministers</p> <p>DLR # 4.2: Number of fixed and wireless broadband subscribers (other than mobile broadband subscribers) in Lagging Regions, generated by all internet service providers in Lebanon, is equal to at least 300,000</p> <p><i>Environmental risks/impacts are typically construction-related and during operation the risks/impacts will be limited to maintenance/repair works which are similar to those related to the construction phase but within limited area</i></p> <p><i>Social risks are related to DLR #4.2, which supports the physical expansion of the broadband network. Minor and temporary livelihood impacts are possible (although not expected).</i></p>	<ul style="list-style-type: none"> - Environmental law and related Decrees, OHS law and Decrees, and institutional framework - Land acquisition legislation and institutional arrangements - Telecommunications laws and decrees 	<ul style="list-style-type: none"> - No requirements for consultation of IEEs. - MOE and MOL have little capacity to monitor EMPs and OHS conditions Livelihood restoration measures in legal framework do cover compensation for crops, lost rent, lost assets but do not ensure livelihoods have been restored. 	<p>Environmental and social screening mechanism used to screen out investments with high environmental and social risks.</p> <p>Consultation and disclosure requirements are included in IEEs ToRs</p> <p>Monitoring of projects to be done by MoT supervision consultants and PEU to follow up on compliance</p> <p>Complementary measures for will be put in place to make sure any affected people are consulted, their assets are valued at full compensation costs, that informal land users are compensated for assets and assisted in their resettlement, and that livelihoods are restored. Specific measures will be included in the POM.</p>
	<p>Implementing Agency: MOT</p>	<p>MOT does not have environmental or social specialists on staff.</p> <p>Currently no GRM.</p>	<p>Recommendation to identify social and environmental consultants to address issues were these to arise.</p> <p>PEU to have Environmental and Social Specialists to follow up on related issues</p> <p>GRM to be established as per guidance in POM</p>

Summary of Risks and Recommendations

DLI / Social and Environmental Risks	Institutional and Legal Framework to Manage Risk	Identified Gaps	Gap-filling measures & Recommendations
<p>DLI #5: New investments established in TSEZ.</p> <p>DLR #5.1: TSEZ bylaws, regulations and Masterplan are approved by the Council of Ministers and are compliant with the recommendations outlined in the SEA, ESSA and POM.</p> <p>DLR #5.2: Private developer-operator for the TSEZ is contracted by TSEZ Authority, based on competitive bidding process, in accordance with the HCP procedures.</p> <p>DLR # 5.3: Lease agreements signed between the private operator and the tenants of TSEZ accounting for at least 60% of the TSEZ total area available for allocation to businesses in TSEZ</p> <p>DLR # 5.4: Number of labor-days for Syrian refugees employed during the construction phases in TSEZ is equal to at least 225,000.</p> <p><i>Environmental risks/impacts are related to construction of infrastructure and hosted facilities and the operation related risks will be according to the type of activities but with a cumulative dimension.</i></p> <p><i>Social risks in the TSEZ are related to potentially poor working conditions and impacts of labor influx.</i></p>	<ul style="list-style-type: none"> - Environmental law and institutional framework. - National Labor Legislation. - TSEZ Law, Bylaws and Regulations. - Regulations on foreign workers International refugee and human rights law. - Legislation and international agreements to prevent human trafficking. 	<p>TSEZ environmental bylaws and regulations not ready yet.</p> <p>MOL doesn't have capacity to monitor compliance with labor regulations.</p> <p>No legal framework to manage labor influx.</p> <p>Regulations on foreign workers not applied as written.</p>	<p>TSEZ bylaws and regulations on environmental aspects and labor will be developed as per the recommendations in the ESSA</p> <p>The TSEZ Masterplan will incorporate recommendations in the SEA and ESSA</p> <p>Screening mechanism applied in selection of tenants. High environmental and social risk industries are excluded.</p> <p>POM will include comprehensive labor influx management plan.</p> <p>Gaps in implementation of regulation managed through the TSEZ Authority.</p> <p>TA will be provided to the MOL to build their capacity to supervise labor issues, with a focus on OHS.</p>
	<p>Implementing Agency: TSEZ Authority.</p>	<p>TSEZ Authority does not have environmental or social specialists on staff.</p> <p>TSEZ Authority does not have capacity to monitor compliance with labor issues.</p> <p>Currently no GRM.</p>	<p>Recommendation to hire:</p> <ul style="list-style-type: none"> - 1 full-time social specialist (covering labor issues including OHS and labor influx). - 1 full-time environmental specialist. <p>POM will establish procedures for monitoring and reporting on labor risks in the TSEZ (including labor influx).</p>

Summary of Risks and Recommendations

DLI / Social and Environmental Risks	Institutional and Legal Framework to Manage Risk	Identified Gaps	Gap-filling measures & Recommendations
			GRM to be established as per guidance in POM.
<p>DLI #6: Increased investments in targeted sectors through value chain development.</p> <p>DLR #6.1: Four (4) VCs selected and their VC Action Plans are approved by the VCC.</p> <p>DLR # 6.2: \$22,000,000 in private investment, consistent with the approved VC Action Plans, generated under the Matching Grant Fund.</p> <p><i>This Results Area supports a matching grant fund which would fund value chains. Environmental risks/impacts will be related to expansion or new production of beneficiary enterprises and the operation related risks will be according to the type of enterprise. Social risks are related to the capacity or history of social risk management (and in particular labor related risks) of supported businesses and institutions. Low levels of social risk are also associated with potential elite capture or perceptions that project resources are allocated unfairly.</i></p>	<ul style="list-style-type: none"> - Environmental law, related decrees and institutional framework. - National Labor Legislation. 	<ul style="list-style-type: none"> - No requirements for consultation of IEEs. - MOE and MOL has little capacity to monitor EMPs and OHS conditions. - Implementation of labor legislation. - Small farms not subject to environmental assessment Decree or ECC could use unlicensed source of irrigation and/or unregistered pesticides. 	<p>Requirement for matching grant agreements to include provisions supporting worker rights. Mechanism to screen out investments that could have significant social or environmental risks.</p> <p>Beneficiary SMEs will comply with national systems, including having, as required, an approved EA instrument (for new SMEs) or ECC (for existing SMEs).</p> <p>Providing TAs for beneficiary enterprises for complying with Environmental and OHS regulations. PEU to follow up on compliance.</p> <p>Consultation and disclosure requirements are included in IEEs ToRs.</p> <p>Farming activities should demonstrate that they are using licensed source of irrigation and registered legal pesticides.</p>

Summary of Risks and Recommendations

DLI / Social and Environmental Risks	Institutional and Legal Framework to Manage Risk	Identified Gaps	Gap-filling measures & Recommendations
	Implementing Agency: MOET.	MOET does not currently screen businesses for their capacity or history of social risk management. MOET does not have environmental or social specialists on staff.	MOET to develop a targeting mechanism in line with the POM. Screening mechanism applied in selection of matching grants that excludes businesses with poor social (or labor) practices (as defined in the POM). GRM to be established as per guidance in POM. PEU to have an Environmental Specialist to follow up on related issues.
Results Area 3: Connecting Women and Youth to Jobs			
<p>DLI #7: Improved labor market outcomes amongst Targeted Beneficiaries.</p> <p>DLR # 7.1: 12,000 Lebanese targeted beneficiaries receive ALMP services.</p> <p>DLR # 7.2: 3,000 Syrian refugee beneficiaries receive vocational training of ALMP in the sectors allowed by the Lebanese Laws and Regulations.</p> <p>DLR # 7.3: 8,000 individual Lebanese Targeted Beneficiaries placed in formal sector employment</p> <p><i>OHS risks for beneficiaries under DLRs 7.2, 7.3 and 7.4. Social risks are limited to perceptions that Program resources are not allocated fairly.</i></p>	<p>OHS Law and Decrees.</p> <p>Implementing Agency: NEO.</p>	<p>Workers typically have low awareness of OHS risks related to their work.</p> <p>Capacity of NEO to communicate with beneficiaries, receive grievances, target vulnerable populations is weak.</p>	<p>Beneficiaries from ALMP services will be trained on OHS aspects related to their work.</p> <p>TA will be provided to help NEO develop and put in place these mechanisms. Standards for high quality communications, targeting, and grievance redress will be included in the POM.</p> <p>NEO will also be providing its targeted beneficiaries training on OHS and labor rights. This builds worker knowledge of such issues, building national capacity.</p> <p>GRM to be established as per guidance in POM.</p>

Summary of Risks and Recommendations

DLI / Social and Environmental Risks	Institutional and Legal Framework to Manage Risk	Identified Gaps	Gap-filling measures & Recommendations
<p>DLI #8: Entrepreneurship opportunities created for women and youth.</p> <p>DLR # 8.1: Contracts for Entrepreneurship Grant Fund Intermediaries are issued, up to \$10million.</p> <p>DLR #8.2: At least 300 beneficiaries of the Entrepreneurship Fund leveraging additional private financing.</p> <p><i>Social risks are limited to perceptions that Program resources are not allocated fairly.</i></p>	<p>- Environmental law and institutional framework.</p>	<p>Capacity of MOET to manage communications, receive grievances, target vulnerable.</p>	<p>Standards for high quality communications, targeting, and grievance redress will be included in the POM.</p> <p>GRM to be established as per guidance in POM.</p>
<p>DLI #9: Support for gender-based policy making for increased women’s economic empowerment.</p> <p>DLR #9.1: Eight gender-focused household and employer surveys are completed and results are published on OMSWA website.</p> <p>DLR #9.2: A gender- disaggregated statistics database is established and the gender indicators are published online</p> <p>DLR # 9.2: A pilot based on technical study/assessment to increase access to childcare provision for all women is endorsed and implemented by the OMSWA.</p> <p><i>No social or environmental risks identified.</i></p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

Introduction

The Government of Lebanon has launched the Lebanon National Jobs Program (NJP) with the support of the World Bank \$400M *Creating Economic Opportunities in Support of the Lebanon National Jobs Program* (hereafter called the PforR or the Program). The Program fosters medium and longer-term job creation in Lebanon, addressing key issues that can help promote stability and inclusion, while also promoting economic growth and good governance.

This Environmental and Social Systems Assessment (ESSA) aims to identify social and environmental risks and opportunities related to the PforR and to assess the Government of Lebanon's capacity to mitigate risks and take advantage of opportunities. This is the final version of the ESSA and incorporates comments from consultations held in Beirut and Tripoli and comments received from online consultations.

Context

The Lebanese economy has been highly volatile over several decades. Real GDP grew, on average, an estimated 3.6 percent from 1965 to 2014 (4.4 percent from 1992 to 2014). These figures mask sharp fluctuations, which are the result of domestic and regional political and economic crises during this period. The effects of these crises are further complicated by the confessional drivers at play in state decision-making.

The crisis in Syria has contributed to a sharp slowdown in Lebanon's economy, aggravated the existing jobs crisis, and raised social tensions. In the six years prior to the start of the Syrian war in 2011, growth was 7 percent annually – it has fallen to less than 1.7 percent in the six years since, and to just 1 percent in 2015 and 2016. Traditional drivers of growth – finance and real estate, but also construction and tourism, which are major sources of job creation for youth and lower-skilled Lebanese – have suffered particularly badly from the onset of the Syrian conflict. Close to 1.5 million Syrians have crossed into Lebanon, representing close to one quarter of the total Lebanese population (around 4.2 million pre-crisis). This is the highest refugee per capita ratio in the world. In 2014, Lebanon hosted over 230 refugees per 1,000 inhabitants, compared to 87 in Jordan in the same year. This has exacerbated the deteriorating socio-economic situation for the Lebanese host economy, increased pressure on labor markets, and severely stretched infrastructure and public services. The result is not only increasing poverty for both refugee and host populations, but also increasing social tensions.

Regional disparities in economic opportunities are stark, with most of the poor living in lagging regions outside of Beirut and Mount Lebanon. Poverty rates in the Bekaa, North, and South Lebanon regions (at 38 percent, 36 percent, and 31 percent, respectively) are well above the national average and around twice as high as in Mount Lebanon and Beirut (22 percent and 16 percent, respectively). This is linked closely with labor market outcomes, with lagging regions having much lower labor force participation, higher unemployment, and significantly higher reliance on self-employment.

ESSA Aims and Approach

Program for Results (PforR) is a World Bank lending instrument that provides support to member countries to improve the design and implementation of their development programs. PforR places more direct emphasis on development results by linking disbursements to results or performance indicators that are tangible, transparent, and verifiable. It works directly with the client institutions and systems and, when appropriate, seeks to strengthen those institutions' governance and their capacities and systems over time.

The key features of PforRs are as follows:

- Financing the expenditures of specific borrower development programs;
- Disbursing on the basis of the achievement of key results (including prior results) under such programs;

- Using and, as appropriate, strengthening the Program systems to provide assurance that Program funds are used appropriately and that environmental and social impacts are adequately addressed by such programs; and
- Strengthening, where appropriate, the institutional capacity necessary for such programs to achieve their intended results.

The Environmental and Social Systems Assessment (ESSA) is crucial to ensure that operations are designed and implemented in a manner that maximizes potential environmental and social benefits. The ESSA assesses the borrower’s organizational capacity and performance to achieve the social and environmental objectives associated with the Program and stipulates supplementary actions as necessary.

The objectives of this ESSA are:

- to establish the risks and potential negative environmental impacts of the Program and ensure that these will be subjected to an adequate initial screening so that relevant mitigation measures can be identified prepared and implemented;
- to document the environmental and social management procedures, standards and institutional responsibilities that will apply to the proposed Program;
- to evaluate the institutional capacity to manage the likely environmental and social effects in accordance with the country’s own requirements under the proposed Program;
- to assess the consistency of the borrower’s systems with core principles and attributes defined in the PforR Guidance Note on Environmental and Social Assessment;
- to recommend specific actions for improving counterpart capacity during implementation to ensure they are able to adequately perform their mandate. These measures are agreed on between the Client/Borrower and the World Bank and are included in the activities to be supported by the World Bank and the borrower during the life of the Program.

Methodology

This ESSA is being conducted in line with the Bank Policy Program for Results Financing.

The environmental system assessment includes:

- i. A review of existing regulations, procedures and guidelines that apply to this program; environmental effects, including residual impacts, systemic risks such as the risk of not identifying significant impacts, potential consequences from inadequate enforcement of mitigation measures, as well as the operational risks of unexpected impacts, accidents and natural hazards;
- ii. An assessment of the capacity to implement the environmental management system, including monitoring, supervision and reporting, at both local and national levels

The social management system assessment includes:

- i. An analysis of social effects, including residual impacts and systemic risk, consultation mechanisms, grievance mechanisms, information dissemination and disclosure, participation and transparency;
- ii. A review of existing regulations, procedures and guidelines that apply to this program;
- iii. An assessment of the capacity to implement the social management systems including monitoring, supervision, and reporting.

The ESSA was prepared by a multidisciplinary team from the World Bank in collaboration with relevant officials and technical staff members of the counterpart implementing agencies. The methodology included:

1. *Desk review.* The review covered current environmental and social legislations and regulations, relevant environmental and social reports (e.g. ESMF and RPF), and reports on the implementation of previous and current World Bank projects;
2. *Identification of potential scope and scale of associated environmental and social effects.* An assessment was carried out to determine whether present systems utilized by the Program have the resources and authority necessary to mitigate unavoidable impacts and achieve maximal social and environmental benefits;
3. *Initial consultation meetings.* Meetings were held with government agencies that will be involved in project implementation, including the TSEZ Authority, NEO, MOET, the Ministry of Environment, the Ministry of Labor (OHS Department) and ILO.
4. *Field visits.* Visits to the Tripoli Special Economic Zone site, and interviews with technical staff in relevant institutions to establish the status and standard of environmental and social safeguards systems at local levels;
5. *Recommendation of Actions.* Gaps and measures to enhance the Program systems and their performance were identified;
6. *Consultations.* Consultations were held in Beirut on 26 February 2018 in Beirut and in Tripoli on 27 February 2018.
7. *Document dissemination.* An ESSA Executive Summary and presentation were disclosed in Arabic and English prior to face-to-face consultations. Additionally, the draft ESSA report was publicly disclosed through the World Bank's External website and public comments were solicited during a two-week period.
8. *Implementation of actions.* Work with the client on developing and agreeing to specific actions to improve system performance during implementation period.

About the Program

The PforR will contribute to the NJP's objective to address challenges to high-quality, inclusive job creation in Lebanon. The NJP is structured across three integrated Results Areas, each of which involves activities designed to address specific aspects of the jobs challenge, and to complement activities under the other Results Areas:

1. Laying the Policy Foundations for Jobs: The first Results Area focuses on establishing a more conducive environment to promote private sector investment and job creation, and to eliminate barriers that prevent certain groups from accessing job opportunities.
2. Catalyzing Job Creation through Trade and Investment: The second Results Area mobilizes private sector investment, promotes exports, and improves productivity in targeted sectors in order to facilitate job creation.

3. Connecting Youth and Women to Jobs: The third Results Area will provide support to women and youth who are seeking jobs or are trying to start small enterprises.

The PforR PDO and Key Results

The Program Development Objective (PDO) of the PforR *is to improve economic opportunities for targeted beneficiaries in Lebanon*. In the context of this Program:

1. *Economic opportunities* are defined at three levels: (i) at the macro level, in terms of measures considered “fundamentals” that would improve the environment for private investment and benefit firms, as measured by the implementation of the new PPP law; adoption of a new telecoms licensing regime (i.e. firms benefitting from improved internet access), simplification of customs procedures (i.e. firms face faster and easier processes for imports and exports), passage of Secured Transactions and Insolvency regulations and establishment of a movable assets registry (i.e. individuals and firms have easier access to finance); (ii) at the level of firms, increased private sector finance to cooperatives and clusters, firms receiving matching grants, and increased occupancy in TSEZ; and (iii) at the level of individuals, improved labor market outcomes amongst Targeted Beneficiaries as they are placed in wage-employment jobs (e.g. counseling, training, intermediation, etc.) or supported to become entrepreneurs (e.g. business development services and financing).
2. “Targeted beneficiaries” include two categories of beneficiaries:
 - i. Firms, particularly SMEs : This group will benefit from the: (i) transversal investment climate interventions in Results Area 1; and (ii) TSEZ and VC activities in Results Area 2.
 - ii. Individual beneficiaries, particularly Lebanese youths aged 18-34 and women (18-45), and Syrian refugees. These groups will benefit from activities in Results Area 3, which are: (i) the active labor market programs for Lebanese; (ii) the vocational training programs for Syrian refugees in accordance with Lebanese Laws and Regulations; and (iii) the entrepreneurship grant and business development services for Lebanese.

The PforR supports implementation of the Government’s NJP across the three Results Areas, as shown in table below.

TABLE 1: RESULTS AREAS AND DISBURSEMENT LINKED INDICATORS (DLIS)

Result Area	DLI	Amount (US\$m)	Justification for DLI selection
RA1: Enhancing the Environment for Private Investment	DLI 1: Operational PPP program	\$70m	Establishing a sufficiently resourced and technically capable PPP unit (DLR 1.1) is an indispensable milestone toward effective PPPs. Completing five feasibility studies on Capital Investment Plan (CIP) and other projects (DLR 1.2, scalable) will then provide sufficient basis to enable two PPP contracts to be signed by the government and private investors.
	DLI 2: Financial Sector Development to improve lending to SMEs	\$45m	The DLI measures actions that could shape a more conducive environment for MSME lending. The approval of implementing regulations to strengthen the credit infrastructure (DLR 2.1-2.2) would establish a more robust insolvency regime and allow for the use of moveable collateral in securing loans, and remove an important barrier to MSME lending, especially to

			women. The Movable Asset Registry (DLR 2.3) is essential to making the policy change effective. Finally, the DLI rewards the increase in lending through the number of loans using movable asset registered at the registry (DLR 2.4, scalable).
	DLI 3: Improved trade facilitation environment	\$25m	The DLI measures steps that can lead to an improvement in Lebanon's trade facilitation environment. It recognizes adoption of the Customs Strategic Plan (DLR 3.1) as a critical starting point. The ultimate outcome is measured as an improvement in the Distance to Frontier score in the 'trading across borders' component of Doing Business (DLI 3.2, scalable).
RA2: Catalyzing Job Creation through Trade and Investment in Lagging Regions	DLI 4: Increased access to high-speed broadband in lagging regions	\$50m	The DLI recognizes the importance of a new telecoms licensing regime based on non-discriminatory principles (DLR4.1) to strengthen competition and facilitate private sector access, and imposes a market test on its impact on broadband by disbursing against new broadband subscriptions achieved through FTTC and FTTH technologies in lagging regions (DLR 4.2, scalable).
	DLI 5: New investments established in TSEZ	\$65m	The DLI bases payments on actions that are indispensable to the establishment of the SEZ (DLRs 5.1-5.2), and on a market test that measures investor's signing lease agreements to establish in the SEZ (DLR 5.3, scalable). This, therefore, targets the commercial viability of the zone and its success in attracting investment (and, indirectly, job creation). Finally, DLR 5.4 (scalable) targets job creation for Syrian refugees in TSEZ construction projects in accordance with Lebanese Laws and Regulations.
	DLI 6: Increased investments in targeted sectors through value chain (VC) development	\$40m	The DLI is structured to incentivize effective implementation of the value chain support program (DLR 6.1, scalable); it also sets an incentive for private investment leveraged from the market (DLR 6.2, scalable).
RA3: Connecting Women and Youth to Jobs	DLI 7: Improved labor market outcomes amongst Targeted beneficiaries	\$65m	The DLI targets effective implementation of the ALMP program to support Lebanese Targeted Beneficiaries (DLR 7.1, scalable), the provision of vocational training to Syrian refugees in accordance with Lebanese laws and regulations (DLR 7.2, scalable), and an output (DLR 7.3, scalable) – Lebanese beneficiaries placed in employment.
	DLI 8: Entrepreneurship opportunities created for women and youth	\$20m	The DLI first targets a critical enabling result, the successful contracting of intermediaries to deliver the grant program (DLR 8.1, scalable) and an outcome of interest, namely beneficiary entrepreneurs leveraging additional private financing (DLR 8.2, scalable), as a measure of success.
	DLI 9: Gender-based policy making for increased women's economic	\$20m	The DLI targets the implementation and analysis of 8 household and employer surveys (DLR 9.1, scalable), it supports steps towards informing the policy dialogue on women's economic empowerment in Lebanon, including setting up a gender database to build gender-disaggregated data established at the OMSWA (DLR

	empowerment supported		9.2) and the launch of a pilot based on a technical study/assessment to increase the access to childcare provision implemented by the OMSWA (DLR 9.3).
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PROGRAM SCOPE

The PforR Program supports implementation of the Government’s NJP. This subset of activities – which forms the Program – covers an overall expenditure framework of US\$695M over a five-year period, of which the World Bank will finance US\$400m. The Program supports all three pillars of the NJP, although some activities in the NJP fall outside the Program scope. Activities in the NJP that are outside the Program include those that:

1. Are long-established and funded, which are relevant to the jobs agenda but not a new initiative to be included in the Program;
2. Would increase complexity to Program implementation, specifically by introducing additional institutions and overly increasing coordination risks of the Program;
3. Would require a timeline not manageable within the Program period; and,
4. Do not meet World Bank Group policies on eligibility for PforR financing – for example those that are likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people, as defined in the Policy and Directives on PforR financing.

In addition, should any activity not meet World Bank Group policies on eligibility for PforR financing – for example those that are likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people, as defined in the Policy and Directives on PforR financing – it would be excluded from the Program.

Program Partners and Agencies

Implementing Agencies. Given the cross-cutting nature of the jobs agenda, several agencies will be involved in implementing the Program. The project design mitigates the complexity this implies by ensuring that each DLI is the responsibility of a specific agency who has the executive accountability to deliver on that DLI. Table 2 summarizes the responsible agencies by Results Area and activity. Dedicated staff will be needed for activities that are new and where the implementing agency does not have existing capacity. This is expected to be the case for MOET, NEO, and HCP – details are provided in the PAP.

TABLE 2: IMPLEMENTING AGENCIES

Results Area	Activity	Implementing agency (partners)
RA1: Enhancing the Environment for Private Investment	Development of PPP program	HCP
	Financial sector development	PMO (BdL)
	Telecommunications development	MOT
	Customs reforms and trade facilitation	HCC (MOF/MOET)
RA 2: Catalyzing Job Creation through Trade	Targeted value chain development	MOET
	Matching grants for value chains	MOET (Kafalat)
	Tripoli Special Economic Zone development	TSEZ (CDR)

and Investment in Lagging Regions		
RA3: Connecting Women and Youth to Jobs	Labor Force Surveys	CAS
	Strengthening and modernizing active labor market programs	NEO
	First-time jobseekers program	NEO
	Entrepreneurship program	MOET
	Improving gender-based policy making for increased women’s economic empowerment and launch of a pilot to improve women’s access to childcare	OMSWA

Program Executing Unit (PEU). A Program Executing Unit (PEU) will be established within three months of effectiveness of the Program and maintained at the Ministry of Finance (MOF) throughout the implementation of the Program. The PEU functions as the secretariat of the Coordinating Committee (see below), responsible for: (i) the overall management, coordination, reporting, monitoring, and evaluation of Program implementation, including Program fiduciary, social, and environmental management; (ii) hiring and interfacing with the IVA; (iii) carrying out Annual Performance Assessment; (iv) carrying out the technical audits; (v) facilitating financial audits for the Program, all in accordance with the Program Operational Manual (POM). In addition, the PEU will carry-out inter-ministerial and inter-agency coordination on the Program policy and technical agenda. The PEU will include project management and M&E, environmental and social specialists.

Inter-Ministerial Coordinating Committee (CC). Coordination at the policy level will be ensured by a National Jobs Program CC, to be established within six months of the effectiveness of the Program. The committee will be chaired by the Minister Finance, with participation from all ministries and agencies that are participating in the Program, including: Ministry of Finance; Prime Minister’s Office; Ministry of Economy and Trade; Ministry of Labor; Ministry of Telecommunications; Ministry of Industry; Central Administration on Statistics; HCC; HCP; TSEZ Authority; Office of the Ministry of State for Women’s Affairs; and Banque du Liban. The CC will provide strategic guidance and direction and facilitate coordination across different departments, agencies and levels of government involved. It will review and finalize recommendation reports and plans developed as part of the different Results Areas and DLIs, monitor progress of the Program on a quarterly basis. The CC will also endorse annual plans for the Program’s monitoring and evaluation (M&E) activities.

Private Sector Advisory Board (PSAB). A PSAB will be established, within six months of the effectiveness of the Program, to provide guidance to the PEU and CC on Program progress and private sector feedback on key policy and program activities. Membership would include representatives from the principal Chambers of Commerce from Beirut and main cities in the lagging regions, plus other identified members to be selected by the PEU in consultation with CC members. The PSAB will be launched based on the mandate and membership to be agreed upon at the first meeting of the CC. A key aspect of this mandate would be to act as a “sounding board” for new interventions or policies that would emerge from the learning and experience of this Program.

Value Chain Committees (VCC). These will be established for each value chain undertaken under the Program. The VCC, chaired and appointed by MOET, will comprise members of the public and private sectors who are relevant to a given VC and agree to take on an active responsibility in the preparation and approval of the VC Action Plans. The mandate of the VCC will be set out in the POM.

Engagement with donors and the private sector. There is a wide engagement of donor programs in areas key to the NJP, including SME, value chain and technical and vocational project initiatives being supported by the EU, UK, Germany, USA as well as UN agencies including the ILO, UNIDO, UNDP and UNICEF. Additionally, aspects of the NJP will be financed by the private sector.

Anticipated Environmental and Social Effects

Main Environmental Effects by Results Area

Under Results Area 1, activities under DLR 1.3 will support the technical design and contracting of two PPP investments. The exact projects under the PPP component are not defined at this stage, however, the HCP is considering infrastructure investments in transport, water supply and sanitation, energy, telecommunications solid and hazardous waste management. Some of those investments will not qualify for support under the Program as they could be associated with significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people. To ensure no such projects are supported, the verification of this DLI will include screening of investments against the Program environmental and social exclusion criteria.

Examples of PPP investments that could be considered include improvement of two existing airports, sewerage infrastructure and small wastewater treatment plants, and telecommunication data centers and infrastructure. The construction of such infrastructure is typically associated with some temporary environmental impacts and risks such as dust emissions, noise, emissions from construction vehicles and machinery, disposal of construction waste, disturbance to traffic, and health and safety risks. Such impacts/risks could be prevented/minimized by implementing adequate environmental mitigation measures during construction. During operation, impacts/risks will differ according to the type of investments (e.g. airports improvements would lead to higher traffic of passengers and waste generation; wastewater infrastructure will be associated with effluent and sludge management issues; buried telecommunication infrastructure will cause limited dust/noise during maintenance and repair). Impacts related to those infrastructure works will be identified through the environmental assessment instrument that will be prepared as part of the national system.

Furthermore, under Results Area 1, the enhanced business environment will facilitate establishing new SMEs, which could involve establishing new industrial facilities or expanding existing ones. Such facilities will generate different types of waste (solid waste, wastewater discharges, and air emissions) that varies according to the type and scale of the facility. It is expected that impacts and risks of such facilities would be minor for most the cases but could also be moderate and substantial for others according to the type of activity. Such impacts will be identified and mitigated. Such impacts will be identified and mitigated through SMEs preparing environmental assessments in compliance with national system requirements.

Under Results Area 2, there are environmental risks under activities supporting the telecommunications sector and the Tripoli Special Economic Zone (TSEZ). The risks and impacts of the broadband infrastructure will mainly be during construction and maintenance activities (dust, noise, emissions from machinery, construction waste management, health and safety aspects and impacts on traffic). As mentioned above, such impacts could be mitigated by timely adopting adequate mitigation measures.

The risks and impacts of TSEZ would be similar to the above-mentioned impacts related to SMEs, also depending on the type of facilities that would be accommodated there, however, because all infrastructure and industrial/commercial facilities will be concentrated within a limited geographic area (about 55 ha), the cumulative impacts and risks would be relatively higher. Currently TSEZ Authority is preparing a masterplan and a Strategic Environmental Assessment (SEA), as required by the Decree 8213/2012. The scope of the SEA includes identifying different environmental aspects focusing on assessing the cumulative impacts of the development on the local environment and infrastructure. An interim report of the SEA has been prepared

characterizing the baseline environmental conditions and the existing environmental pressures. The aim of this interim report was to reach early environmental and social findings that would inform the masterplan about possible constraints to the development. The main conclusions of this report were as follows:

- The zone is located within the boundaries of Tripoli Port on a reclaimed land from the seaside of the port. The reclamation started in 2010 and was finalized in 2017. Hence the project site is totally developed, unutilized and free from contamination. No natural habitats or cultural heritage assets are within or near the site⁸ (Map and pictures of TSEZ extracted from the baseline report can be found in Annex 5).
- The nearest residential is about 1.8 km from the center of the site. The site surroundings include the port, a domestic solid waste disposal site (with a gabion wall constructed on the border with TSEZ).

Air quality in Tripoli is impacted by existing emissions mainly from transportation and industry (including power sector). According to the latest emission inventory done in 2012, on-road mobile sources form 96 and 66 of CO and NO_x emissions, respectively, while industrial emissions (including energy generation especially from private generators) contribute to around 45 percent of SO₂, PM₁₀, and PM_{2.5} emissions with for each. The monitored ambient air quality parameters in Tripoli shows that PM₁₀ and TSP are above Lebanese ambient air standards most of the time.⁵

- The wastewater generated from TSEZ will be discharged to the Tripoli Wastewater Treatment Plant (WWTP), which started operation in 2009. Currently the WWTP is receiving an average of about 30,000 m³/d⁶, which is far below its design capacity of 135,000 m³/d. Although the WWTP is equipped with facilities for pre-treatment, primary treatment, secondary treatment and anaerobic sludge treatment, it is currently operating only the pre-treatment facilities (screening and oil and grease removal) due to contractual issues with the private operator of the WWTP. However, it is foreseen that the with increase of influent the WWTP will be fully operational.⁷ The effluent is discharged to the sea through 1.6 km offshore outfall.
- In light of the above, the SEA baseline report provided the following main recommendations for the development of TSEZ masterplan so that the main issues related to TSEZ are timely addressed:
 - The zoning of TSEZ should consider the impacts of the neighboring disposal site. Adequate fencing and setback should be considered. Activities of processing and storage of edible products should be as far as possible from this site.
 - The drainage network of TSEZ should separate clean storm water from wastewater so as not to discharge shock loads to the WWTP. TSEZ facilities should abide with influent standards set by the WWTP¹¹ and should provide pre-treatment if necessary.
 - The masterplan should include an integrated approach to waste management including source separation for municipal, recyclable and special wastes for separate collection of products. The MP should recommend treatment and disposal options.

⁴ The nearest natural habitat of preservation value is Palm Islands located 5.5 km northwest of TSEZ a composting plant, a slaughter house, Tripoli wastewater treatment plan and few commercial establishments

⁵ Lebanese ambient air standards are in Annex 3, where PM₁₀ standard is 80 µg/m³ for 24 hours.

⁶ This increases during rainy days to reach a peak of 80,000 m³/d

⁷ Those standards would be according to the operation conditions of the WWTP by the time when TSEZ starts operation.

- Power demand to be calculated so that suitable power alternatives are addressed, including connection to the city grid and maximizing the use of solar energy⁸ so as to minimize the need/capacity of power generators that would be procured.

The SEA will continue assessing different planning alternatives of the masterplan, and the SEA recommendations should be respected during the preparation of TSEZ environmental regulations and standards. The SEA will inform the masterplan on: eligible and noneligible investments (all investments with high environmental and social risks will be screened out), development limitations according to the assimilative capacity of local environment and planning requirements of the zone.

Also, under Results Area 2 there will be investments in value chains in selected sectors, with a focus on agribusiness, ICT services and possibly tourism. The exact interventions are not currently identified and will be identified during implementation after consultations with the private sector. Examples for the matching grants that could be provided to cooperatives and firms may include improving storage of agriculture products, supporting climate resilient agriculture activities, supporting Eco-Labeling for agriculture products, supporting ICT service coverage, providing training to the hospitality SMEs. The environmental impacts of a typical agriculture project that involves farming activities are related to unregulated use of irrigation water, which may lead to impacts on water resources, and unregulated use of pesticides, which could include use of banned pesticides. The typical impacts of such interventions are minor to moderate (matching grants will be in the range from \$ 10,000 to \$ 250,000), and will be subject to the environmental assessment instrument identified by the national system. Screening out of interventions of high environmental and social significance will be also applied.

Under Results Area 3, workers and entrepreneurs will be qualified and placed in the labor market, therefore the impacts will be mainly related to Occupational Health (OHS) risks correspondent to the type of employment. OHS risks could be significantly minimized if workers are aware of such risks and could effectively mitigate those risks by following adequate measures. Such measures are included as part of the training requirements for those workers as further detailed below.

The Program will also have some environmental benefits such as:

- Supporting cooperatives and firms in agribusiness value chains (Results Area 2) to raise environmental standards and certify compliance with global standards, including obtaining Eco-Labeling, which will potentially lead to reducing the use of agrochemicals. There could be also some value chains supporting climate resilience including new seeds varieties and techniques that could reduce water and chemicals use.
- Providing training on OHS as a requirement of the training program for improving the skills of the labor under Results Area 3, so that general OHS awareness and knowledge is built in the Program supported areas. The objective is to make sure that beneficiaries under this Results Area will be trained on minimizing OHS risks related to their field of expertise.

Main Social Effects of the Program

Overall social risks are moderate. Moderate risks are associated with Results Areas 1 and 2. Under Results Area 1, support to PPPs will include technical assessments, tendering, and contracting of two pilot projects. Under Results Area 2, these risks are associated with labor risks in the TSEZ. All other activities have low or no directly attributable social risks.

⁸ The maximizing of the use of solar energy has been discussed with the consultant of the master plan during preparation of this report, so that the design of different buildings will consider maximizing the use of roofs and side walls for solar power generation

Cumulative social impacts of this Program are expected to be positive. In particular, the Program addresses key constraints to increasing employment in Lebanon through support to policy development, support to firms and sectors with high potential for job creation, and by directly supporting vulnerable groups including women, youth and refugees. The Program will benefit these groups by decreasing unemployment and promoting entrepreneurship, activities which are expected to have repercussions on local communities in lagging regions. These activities will directly reduce the vulnerability of these social groups and could also have indirect impacts on social cohesion. Activities to support the business environment and financial sector will also promote transparency, thereby also increasing the ability of Lebanese of all backgrounds to benefit from private sector development.

Factors determining whether or not Program activities will have social risks include: (i) characteristics of the context and the specific vulnerabilities of individuals and social groups; and (ii) how the Program interacts with the characteristics of the context; and (iii) the capacity and willingness of implementing agencies to manage social risks as they arise. The remainder of this section addresses the first two factors, while the section on Social Systems Assessment addresses the third.

Context: Poverty, inequality, and conflict in Lebanon

Despite its classification as a Middle-Income Country, Lebanon has high rates of poverty. Extreme poverty in the country has hovered between 7.5 and 10 percent over the past 25 years, while 28 percent of the population is considered poor using the upper poverty line. Poverty is not evenly distributed – it is concentrated in the north and south of the country, as well as in small, dense pockets in the suburbs of large towns. A key factor behind the high levels of poverty is the low level of employment, and the fact that many of the jobs that are created are low quality jobs. Poverty is also related to demographic variables, being more pronounced among households with many children.⁹

The type of employment is related to poverty in Lebanon. Incidence, depth and severity of poverty are the highest among non-salaried employees.¹⁰ Such employees constitute more than one third of the working poor, while another third of the working poor are self-employed. In contrast, salaried employees and employers have the lowest poverty incidence. Compared to Lebanon's overall poverty rate of 8 percent, over 20 percent of households engaged in agriculture fall below the poverty line, and the sector is currently experiencing downward pressure on wage labor. This suggests a large extent of poverty among unskilled Lebanese in informal and low productivity employment, and large gaps in earnings between formal/skilled and informal/unskilled jobs.¹¹

The differences in poverty across regions are striking. 27.3 percent of the poor are concentrated in Mount Lebanon, and 38 percent were concentrated in the North. 46 percent of the extremely poor population is found in the North region. Labor force participation rates are again lower in the North, at 38 percent, and are also lower than average in the South and Nabatieh. Lower participation rates and higher unemployment could be due in part to spatial disparities in infrastructure and service delivery.¹²

Elite capture has been cited as a key reason for Lebanon's failure to generate inclusive growth and jobs. Illegal activities are usually not sanctioned by the state when involving (politically/confessionally) well-connected actors, which exacerbates elite capture and patronage systems. Influence of economic stakeholders and personal connections is more likely to influence policy execution and enforcement of the rule of law.

⁹ World Bank (2015) *Lebanon: Promoting Poverty Reduction and Shared Prosperity. A Systematic Country Diagnostic.*

¹⁰ El Laithy et al. (2008) in World Bank (2015) *Lebanon: Promoting Poverty Reduction and Shared Prosperity. A Systematic Country Diagnostic.*

¹¹ World Bank (2015) *Lebanon: Promoting Poverty Reduction and Shared Prosperity. A Systematic Country Diagnostic.*

¹² Ibid.

Gender issues are also important in Lebanon. According to the World Economic Forum’s Global Gender Gap Report of 2014, Lebanon is the World’s eighth worst country in terms of gender equality, ranking 134th out of 142 countries surveyed. This low score is mostly driven by the poor performance of the country in terms of political empowerment (the Global Gender Gap Index measures the relative gaps between women and men across four key areas: health and survival, education attainment, economic participation, and political empowerment). In terms of economic participation, Lebanon ranked 133 out of 142 countries, due to relatively low levels of female participation in the workforce (female to male ratio of 0.34), and low estimated earned income for women (female to male ratio of 0.27).¹³

Young people are particularly vulnerable. At 34 percent, youth unemployment is among the highest in the region. For the most part, youth are disengaged from the political process and demotivated to impact any real change in Lebanon in the prevalent economic and political situation, hence their strong propensity to emigrate.¹⁴

Conflict has had a significant impact on Lebanese society. The 1975-1990 civil war halved the country’s economy, the 2006 conflict with Israel cost the country well over USD 2.5 billion, and the Syrian conflict is estimated to have already cost Lebanon over USD 7 billion in foregone output. The political and social impacts of these conflicts have been profound. As a result of the civil war, sectarian divisions deepened and patronage systems tightened. The state became unable to deliver social services, and NGOs/civil society (many of which operate on a confessional basis) stepped in as service providers – a role they still play today. Syrian conflict further divides social groups within Lebanon, as now opposing Lebanese confessions support different sides in the Syrian conflict. In addition, several violent incidents have led to a deteriorating security environment and local communities are increasingly seeing the refugees as threats to social stability, with a number of municipalities having instituted curfews specifically targeting Syrians.¹⁵

The Syrian conflict has not only had conflict impacts on Lebanon but has also exacerbated poverty. The influx of 1.17 million¹⁶ refugees registered with UNHCR in the country has put a great deal of pressure on social services in the country. The refugee influx has severely strained the capacity of key infrastructures, notably water, sanitation, electricity and solid waste management and municipal services, including in terms of access, distribution and quality.¹⁷ The large number of refugees has also increased the size of the labor force by approximately 35 percent - the low level of education of the refugees suggests that they will join the supply of low skilled workers, and that tensions between host and refugee populations are likely to increase. By the end of 2014, an additional 170,000 additional Lebanese people are estimated to have been pushed into poverty due to the impacts of this conflict. This is in part because areas that are hosting large numbers of refugees are also high poverty areas.¹⁸

Syrian refugees also have specific vulnerabilities. The refugees that are currently in Lebanon mostly come from poorer than average areas of Syria. As compared to the host population, Syrian refugees tend to have larger families, have lower than average education levels, and have fewer assets. Syrian refugees in Lebanon are more likely than the host populations to work in agriculture, have fewer economic opportunities, and have limited access to services. In addition, there is a higher share of women and children among the refugee population, as well as a higher share of people in psychological distress. Early signs of vulnerability and negative coping strategies (mobility, debt, asset selling, child labor, early marriage, begging, etc.) are

¹³ UNDP (2009) in World Bank (2015) *Lebanon: Promoting Poverty Reduction and Shared Prosperity. A Systematic Country Diagnostic*.

¹⁴ World Bank (2015) *Lebanon: Promoting Poverty Reduction and Shared Prosperity. A Systematic Country Diagnostic*.

¹⁵ Ibid.

¹⁶ UNHCR (2015) *UNHCR Country Operations Profile: Lebanon*.

¹⁷ World Bank (2013d) in World Bank (2015) *Lebanon: Promoting Poverty Reduction and Shared Prosperity. A Systematic Country Diagnostic*.

¹⁸ World Bank (2015) *Lebanon: Promoting Poverty Reduction and Shared Prosperity. A Systematic Country Diagnostic*.

prevalent among the Syrian population. Perhaps most notably, when the Lebanese poverty rate is used, 9 out of 10 refugees are below the poverty line.¹⁹ International assistance has prevented an increase in poverty but remains inadequate and is unsustainable. Economic opportunities in hosting countries are few and not increasing, no short-term prospects of return to the country of origin.²⁰

Syrian refugees are more likely to be socially excluded than the host population. Refugees are likely to have been separated from social and community networks, including family; to have lost or have weakened security and protection mechanisms and networks; and to be experiencing difficulties adapting to a new environment. Refugees are more likely to have been forced to discontinue education, have reduced access to services, and to have more free time. These dramatic changes often force young refugees, and especially female youth, to be under pressure to abide by traditional norms and rules, to marry early and to stay confined at home. Refugees are more likely to feel fear, sadness, anger, boredom, and pessimism, as well as frustration and loss of control.²¹

Among the refugee population, children, youth, and women are among the more vulnerable. Young people, seeing themselves with free time and lack of opportunities, are more likely to resort to violence, including sexual violence, to criminal activities, or to substance abuse. In other cases, young people become victims of abuse or exploitation. Young people in this situation are more likely to resort to survival sex, have unsafe sexual relationships. For economic reasons, some may also drop out of school so that they can work or enter early marriages. The humanitarian setting forces young people to assume adult roles at an early age, and without proper role models or support networks.²²

Labor rights are an important issue in Lebanon. The Lebanese labor code provides wide-ranging protections for Lebanese citizens. Regulations require workers to have contracts (oral or written), establish a minimum wage, maximum number of work hours, entitlements to leave, social security benefits, rights upon dismissal, and grievance redress mechanisms. However, labor inspectors do not have the capacity to enforce labor rights. In addition, many Lebanese work informally, and do not have the entitlements provided for in the law.

Labor conditions for refugees and migrant workers are particularly difficult. Because of restrictions on refugee work (see section 6), many refugees work informally, for low wages and in difficult work conditions. Many refugees and migrant workers depend on Lebanese sponsors for their work permits, which sometimes leads to abusive situations. In addition, there have been multiple reports that refugee children are being forced to work to support their families, and that work conditions are deplorable.²³

Overall Expected Social Impacts

The Program has been specifically designed to address key contextual and vulnerability risks. The Program was designed with the intent of mitigating against one of the key issues arising from the Syrian Crisis: unemployment. The Program also aims to increase employment among some of the vulnerable groups identified: it focuses on Lebanese women, and youth impacted by the Syrian Crisis, as well as on Syrian refugees in sectors allowed by the Lebanese Laws and regulations.

¹⁹ Ibid.

²⁰ Verme, P. et al. (2015) *The Welfare of Syrian Refugees: Evidence from Jordan and Lebanon*. Washington, DC. The World Bank.

²¹ Al Masri, M. et al. (2014) *Situation Analysis of Youth in Lebanon Affected by the Syrian Crisis*. UNFPA, UNESCO, UNICEF, Save the Children and UNHCR.

²² Ibid.

²³ See: Halldorsson, H. (2017) *Syrian Refugee Children in Lebanon at Risk of Child Labor, Missing Out on Education*: https://www.unicef.org/education/lebanon_94437.html, The Freedom Fund (2016) *Struggling to Survive: Slavery and Exploitation of Syrian refugees in Lebanon*: <http://freedomfund.org/wp-content/uploads/Lebanon-Report-FINAL-8April16.pdf>

The Program is expected to have positive social impacts. In particular, the Program includes mechanisms to address key issues faced by vulnerable groups including women, youth and refugees. The Program will benefit these groups by decreasing unemployment and promoting entrepreneurship, activities which are expected to have repercussions on local communities in lagging regions. These activities will directly reduce the vulnerability of these social groups and could also have indirect positive impacts on social cohesion. Activities to support the business environment and financial sector will also promote transparency in the sector, thereby also increasing the ability of Lebanese of all backgrounds to benefit from private sector development.

More specifically, the Program is expected to have broad positive social impacts on the following inclusion. The Program is designed to have positive impacts on inclusion, and in particular on gender. The Program, in fact, based several aspects of its design on the results of a Gender Assessment completed for the project. The program will support women's economic empowerment by strengthening evidence-based policy making and raising awareness on women's rights in the workplace, and the benefits of increased women's participation in the labor market.

The Program also emphasizes meeting the needs of young Lebanese, who are disproportionately unemployed. Youth are directly targeted in Results Area 3, but activities in this area will also be linked to those of other Results Area, maximizing impacts on young people.

In addition, the Program is also expected to have positive impacts on Syrian refugees. The Program specifically supports construction (through Results Area 1 and 2) and Agriculture (through Results Area 2), sectors that disproportionately employ refugees, in accordance with Lebanese Laws and Regulations. Three thousand Syrian refugees will also benefit from vocational training services in sectors allowed by Lebanese Laws and Regulations under Results Area 3.

The Program also fosters social inclusion by focusing on lagging regions within Lebanon (defined as governorates outside of Beirut and Mount Lebanon).

The Program is also designed to have positive impacts on social cohesion. The design assumes that:

- 1) Employment is linked to conflict and fragility, and that providing jobs, especially for youth, fragility is reduced.
- 2) Policy reforms will result in private sector job creation that will impact a large number of social groups.
- 3) Public-private dialogue supports social connections between different group and supports trust between citizens and their state.
- 4) Short term job creation is not sufficient to address exclusion. Sustainable, private sector-led job creation is necessary.

Positive impacts on social cohesion are also likely to accrue from institution-building activities. These activities will help institutions better deliver services, therefore improving citizen trust in the state.

The Program is expected to have positive impacts on social accountability. For example, technical assistance will be provided to agencies implementing activities that have closer links to direct beneficiaries. Technical assistance will also be provided to the National Employment Office (NEO) such that they can develop a grievance redress mechanism that can help them identify problems with the design of activities, targeting mechanisms, or with the services provided to job-seekers or to employers. NEO will also receive training on communications, which will help improve knowledge of their services among potential beneficiaries. In addition, the HCP, the TSEZA and the MOET will also put in place GRMs that gather feedback from users of their services, contractors, workers, and beneficiaries. Through TA, these agencies will also receive support to make these GRMs best practice.

There are some social risks that could emerge if project activities are not implemented transparently and accountably. Lack of transparency and accountability could lead to a perception that some groups are

benefitting more than others and that resources are being distributed to elites, along confessional lines, or are going towards one or another nationality. These impacts would occur if beneficiaries were not selected in such a way that vulnerable groups are included, if communications and consultations throughout the project were not carefully carried out, and if one or another social group clearly benefitted more than others. These risks are low because of specific measures put in place in each Results Area, as described in the section below.

Expected Social Impacts by Results Area

Results Area 1 – This Results Area largely supports the implementation of reform actions. Distributional impacts of this Results Area are likely to be positive, as they reduce barriers to trade through customs reforms, increase access to credit for Micro, Small and Medium Enterprises (MSMEs) and women through financial sector reforms, and support expanded private sector and PPP investment in economic infrastructure. Reforms can contribute to greater investment in critical public and social infrastructure. The reforms intend both to provide a foundation for the private sector to thrive while also opening up these sectors to a broader range of actors. In fact, reforms that increase access to credit for MSMEs and women clearly intend to make the Lebanese private sector more inclusive.

Moderate social risks under Results Area 1 are related to PPP investments. One of the Disbursement Linked Results (DLRs) expected under this Results Area will support two PPPs being contracted. High risk PPP investments will be screened out, but projects having moderate social risks, including risks such as land acquisition and labor influx will be eligible for support. Land acquisition and/or livelihoods impacts, *if any*, are expected to affect less than 100 people in total per PPP investment. Labor influx is not expected to be significant, as most possible PPPs either do not create large numbers of jobs during construction, create very short-term jobs during construction that are unlikely to attract workers from faraway communities, or are expected to hire only local workers. Social risks such as these, and any others that are identified will be managed by building the capacity of the HCP, the implementing agency for these activities, on social and environmental risk management, and by putting in place measures, outlined in the POM, to address any gaps between the Lebanese legal framework for land acquisition and the core principles outlined under the Bank Policy Program for Results Financing. The HCP will hire specialist consultants to assess social risk for every PPP project in their portfolio and will have a social specialist (half-time) to follow up on the implementation of social risk management measures recommended by specialist consultants. The HCP will also have a Grievance Redress Mechanism (GRM) to collect and respond to grievances and feedback from citizens.

Results Area 2 – This Results Area supports a broad range of activities, including implementation of reforms, infrastructure investments, matching grants, and technical capacity building. Activities to support the expansion of the broadband network will have low levels of social risk. These activities will not require land acquisition and are not expected to have permanent impacts. Temporary livelihood impacts on informal vendors are possible but not expected. If such impacts were to be identified, vendors would receive assistance to relocate temporarily their businesses. Under this Results Area, the most important (yet still moderate) social risks are related to labor rights and conditions in the TSEZ.

The TSEZ is expected to provide jobs to Lebanese and Syrian workers, in accordance with Lebanese Laws and Regulations, during its construction and operational phases and can also hire other foreign skilled workers if there is such a need. The risks arise from the limited capacity of the Ministry of Labor and TSEZ Authority (TSEZA) to monitor labor conditions. However, the TSEZA, with technical advice from the Bank, will be developing bylaws and regulations that establish labor regulations that protect workers as per the recommendations outlined in the ESSA. The TSEZ Masterplan will also be drafted in line with this ESSA. These measures, measures for monitoring of labor conditions that will be outlined in the POM, and the requirement for TSEZA to include a social specialist tasked with monitoring labor conditions, mitigate against labor risks in the TSEZ. In addition, the TSEZ will set up a GRM to collect and respond to grievances from workers in the zone, contractors, tenants, and any citizen that wants to provide feedback.

The TSEZ is expected to employ approximately 8,000 individuals when it is fully functioning. Although this could result in labor influx, the Program has chosen to support the TSEZ precisely because it would largely create employment in Tripoli. Lebanese and Syrians already living in Tripoli are expected to make up the work force for the TSEZ, with skilled foreigners being hired as needed. Although there is no data on the exact number of foreigners or Lebanese and Syrian workers expected to arrive to work in the TSEZ from outside of Tripoli, the risks related to labor influx are considered to be moderate. This is because the metropolitan area of Tripoli has a population of over 1 million people and the city could easily accommodate workers coming from outside. However, the POM will establish a mechanism to monitor for negative labor influx impacts and all workers, whether local or foreign, will be required to sign a code of conduct outlining their expected behavior inside the zone and when relating to nearby communities. The TSEZA social specialist will also hold regular meetings with communities surrounding the TSEZ to make sure that the TSEZ Authority has information on potential negative impacts related to labor influx.

Value chain support programs have moderate to low social risks. The level of risk is related to the vulnerability of workers that specific value chains may attract. Agribusiness value chains, for example, have been chosen because of their potential for job creation among the vulnerable, including refugees. However, vulnerable individuals are also more easily hired into jobs and businesses with poor working conditions and can also more easily become victims of human trafficking. To prevent supporting businesses that benefit from these practices and to encourage better labor practices and protection of vulnerable people in the supported sectors, the MOET will screen for labor and social risks and will consider ineligible any businesses where working conditions for vulnerable individuals do not meet good practice standards on payment of fair wages, working hours, abiding by the minimum age to work, or other criteria as outlined in the POM. Matching grants supporting value chains will require that businesses commit to upholding key standards on social and labor risk management, as outlined in the POM, and a MOET staff member will be assigned to monitor for social risks during implementation. A simple GRM, consisting of a widely publicized hotline and an address to send written complaints, will also be put in place. This GRM will also take grievances from entrepreneurship support activities.

Value chain support programs are also expected to have positive social impacts. Public-private dialogue forums will help establish dialogue between government institutions and the private sector, contributing to improved social exchange. Matching grants will be provided to support cooperatives and firms operating in lagging regions, where Syrian influx is greatest and social tensions between refugees and host communities are highest.

Results Area 3 – This Results Area is expected to have positive impacts on the employment of Lebanese women and youth affected by the Syrian refugee crisis and potentially on Syria refugees in accordance with Lebanese Laws and Regulations. By design, these activities promote social inclusion. Because the activities focus on those affected by the Syrian crisis, there is also an expectation that they would foster social cohesion. In particular, by helping Lebanese citizens get jobs, there is a chance of reducing grievances that these individuals may have due to the perception that Syrians are taking their jobs. By helping Syrians receive vocational training, the Program will also help prevent a lost generation among the Syrian population and help prevent grievances. However, for the impacts on social cohesion and social inclusion to materialize, the Program will need to be transparent about its criteria for targeting and targeting needs to be carried out effectively. If targeting is not carried out transparently, there is a small risk that divisions between social groups would be exacerbated. A GRM will also be out in place in NEO to address grievances related to these activities.

Results Area 3 will also have positive social impacts through its support to programming on gender. Specifically, the Program will support the following activities:

1. Advocacy unit at the OMSWA. This unit at the ministry would aim, in partnerships with relevant stakeholders and Gender Units in ministries and institutions, to: (i) raise awareness about women's right in the workplace (targeting both employers and employees, including refugees), (ii) share best practices amongst private sector firms in retaining and attracting women; (iii) raise awareness on the economic impact of stronger participation of women in the labor market; (iv) address gender norms; and (v) address concerns and raise awareness on the economic impact of sexual harassment at the workplace²⁴.
2. Gender database with gender-disaggregated data. A database will be set up at the OMSWA to compile existing and collect new (quantitative and qualitative) gender-disaggregated data. This database would be further improved and complemented by conducting innovative surveys to shed light on the challenges faced by women, especially related to economic empowerment. Such gender-disaggregated data are missing today and are critical for the newly established ministry for relevant and adequate evidence-based policy making on gender.
3. Childcare provision action plan and implementation of a pilot. High-quality childcare accessibility and affordability are widely accepted as necessary areas needing improvement to enhance women's participation in the labor market in Lebanon. This activity will develop a detailed feasibility study, with a clear action plan and required laws/regulations to be passed and implement a pilot to increase access to childcare for women so they can be economically active. The OMSWA will lead on this initiative, supported by local and international experts, and by consulting the private sector, local partners and stakeholders (e.g. government agencies, labor unions, and civil society).

Description of the Existing Environmental and Social System

Environmental Legal Framework

The environmental legal framework in Lebanon is considered to be detailed and comprehensive. The World Bank in partnership with the Government of Lebanon (GoL) developed a Country Environmental Analysis (CEA) in 2011 aiming at providing the analytical underpinning for integrating environment into the development process, the CEA performed a comprehensive review of Lebanon performance with regards to environmental sustainability. The CEA indicated that “*Despite overall political instability, sluggish economic performance, and frequent Cabinet of Ministers (COM) changes, there have been substantial achievements in Lebanon’s institutional and legal framework since the establishment of the first MOE in 1993. Lebanon has prepared a series of strategic documents that guided the environmental policies highlighted in successive COM Policy Statements*”. However, the CEA also highlighted that there are many challenges to the environmental system such as strengthening the coordination and integration of sector polices (between 11-line ministries) and improving the institutional sustainability of MoE.

The following sections demonstrates how the environmental laws and standards cover the different environmental aspects of the Program.

Environmental Assessment

The Environmental Impact Assessment system in Lebanon is well established since issuing the Environmental Protection Law 444/2002. The Law requires, in Article 21, that project proponents in public and private sectors should carry out EIA for any project that is likely to cause negative impacts on the environment. The EIA decree clarifies which projects are subject to an EIA and to which level of details, according to a screening system provided in the annexes of the decree. The EIA should be prepared by the

²⁴ A draft law submitted by the OMSWA that criminalizes sexual harassment is pending Parliament approval; once approved, the unit could also raise awareness of the legal consequences of such behavior.

project proponent and approved by the MoE. After the issue of the Law in 2002, an EIA Decree (8633/2012) was issued by MoE for identifying the concepts and rules that should be followed in preparing EIAs.

According to Decree 8633/2012 the EIA process includes the following steps:

- Screening: the project proponent presents a project screening form (standard form annexed to the Decree). The MoE provides its feedback within 15 days with the project classification. Projects are classified to 3 categories according to their environmental risk and sensitivity:
 - Annex I projects (highest risk). Requires full EIA. Annex I of the Decree includes list of certain activities that are typically associated with high environmental risks.²⁵
 - Annex II projects (medium risk). Requires an Initial Environmental Examination (IEE). Annex II of the Decree includes list of those projects which are associated with less environmental risks than those in Annex I.
 - Annex III sensitive areas, including legally protected areas (natural protectorates, natural forests, wetlands, river banks, natural parks, important bird areas, historical, archeological and sacred sites), habitats of endangered species, natural ponds, sea, river and spring shores and state-owned land. Any project located in those areas will be elevated to a higher risk category.
 - Any project not included in Annex I, Annex II and is not located in any of Annex III areas will not need further environmental assessment
- Preparing IEE for Annex II projects, by the project proponent, according to the guidelines provided in Annex XI. Those guidelines require the IEE to include a concise description of the project, the baseline environment the expected impacts and the EMP. The IEEs are reviewed by MoE technical committee, within 30 days, according to certain criteria described in MoE's decisions 260/1-261/1 of 2015 using a review checklist. If the project proponent did not receive response from MoE within 30 days he would consider the IEE approved. The MoE could elevate the project category to I if the IEE review revealed that the project could have important environmental impacts.
- For Annex I projects the project proponent should prepare a scoping report, according to the guidelines provided in Annex 7 of the Decree. The scoping report should include a more detailed description of the project (than what is required in IEE), the alternatives, the baseline data, the expected impacts and the EMP. The Municipality where the project will be implemented should inform public that an EIA will be prepared and should give them least 15 days to send any comments or concerns. The MoE reviews that scoping report within 15 days and provide any comments to be considered. The project proponent prepares the EIA report considering comments made during the scoping stage and submits the EIA to MoE whom should provide their comments within 2 months.
- In terms of consultation, it is obligatory to hold consultations with stakeholders for Annex I projects during scoping, as indicated above. For disclosure, approved scoping reports and EIAs by MoE are made available for concerned parties and the general public at MoE, but without disclosing any data related to copyrights, industrial and financial details.
- The project proponent is responsible for implanting EMPs during construction, operation and decommissioning, and MoE is responsible for monitoring.

²⁵ Annex I projects are listed in Annex 1 of this ESSA

The screening procedures of projects, per the above procedure and the list of activities in Annex I and Annex II of the EIA Decree, is considered adequate in classifying the projects according to their correspondent environmental risks. Although a qualitative risk-based procedure for classifying projects, as followed in OP 4.01, could be more targeting and flexible, the use of standard positive lists, as the case in Decree 8633/2012, could be more consistent and standardized for use on a national scale. Accordingly, the use of the screening method of Decree 8633/2012 would be a good base to screen out high risk activities that should not be supported by the PforR.

The Environmental assessment system in Lebanon also includes a requirement for preparing Strategic Environmental Assessment (SEA) for certain developmental policies, programs or development of a certain area or a certain sector. Decree 8213/2012 stipulates that the body responsible for such policy or program should prepare a SEA to evaluate the impacts of such development at an early stage of planning. The Decree clarifies the stages for preparing the SEA, starting from screening²⁶, scoping, preparing the SEA and the EMP. The annexes of the Decree clarify the required information and outline of the scoping report and the SEA report. The disclosure of SEA is decided by MoE according to the laws and regulations that should be complied with. Such Decree is considered to be pioneer in the Middle East and North Africa region.

The preparation of IEEs, EIAs, Environmental Audits²⁷ and SEAs should be done by accredited consultancy firms, according to MoE Decision 1/588 of 2015, by the Council of Development and Reconstruction (CDR) under “environmental studies firms” section. Generally, the Lebanese consultancy firms are one of the best in the region, and it includes international experiences from different parts of the world. Accordingly, the capacity for preparing environmental assessment instruments in the consultancy market is quite sufficient. Also, the experience among the MoE staff assigned for reviewing the instruments is quite good²⁸ however, the number of staff may not be sufficient for meeting the demand, therefore, MoE could outsource the review to external experts if needed.

The environmental assessment requirements for new and existing industrial facilities, according to Decrees 8633/2012 and 8471/2012²⁹ respectively, are integrated in the procedure for licensing industrial facilities as per the Ministry of Environment Decision 1/590 issued in December 2015. The industrial facilities are classified into 5 categories corresponding to their risks on human health and the environment³⁰, the industrial licensing of categories 1-4 should be according to the following conditions:

- In case the facility is located in an area with an urban plan the type of activity should be consented in the correspondent plan. If the type of facility is included in Annex I or Annex II of Decree 8633/2012 and is not on operation the license would not be granted except after approving the EIA instrument, while if it is already in operation the license would not be granted except after approving an environmental audit showing the compliance status of the facility with environmental laws.
- In case the facility is located in an area without an urban plan, the type of activity should be consented by Decree 2366/2009³¹ depending on the surrounding land use (certain regions cannot accommodate certain type of activities). If consented, Activity types 1 and 2 should comply with the buffer zone requirements with certain setbacks from environmentally sensitive areas and, if complying with those buffer zones, a suitable EIA instrument should be prepared for non-operating facilities and an

²⁶ Policies/programs related to sectors or areas that would not likely to cause environmental impacts are not subject of the SEA Decree

²⁷ For assessing compliance as shall be indicated in a later section

²⁸ According to Decision 260/1 the Environmental Technology Unit of MoE should form a technical committee to review reports.

²⁹ Decree 8471/2012 is related to environmental compliance as shall be more detailed later in this report

³⁰ As per Decree 5243/2001

³¹ Decree 2366/2009 concerning land planning is presented later in this Chapter.

environmental audit should be prepared for operating facilities and should be approved by MoE for granting the license.

- For Activity types 3 and 4 no special requirements for buffer zones, the only license condition is approving an EIA instrument or an environmental audit as relevant.
- For Activity type 5 and other activities that are not subject to environmental assessment by Decree 8633/2012 they should comply with the land use conditions (either through an area urban plan or to comply with Decree 2366/2009) and with the environmental conditions identified by MoE for this type of activity.³²

Annex 2 of this report presents the 5 industrial categories as per Decree 5243/2001.

The CEA assessed the environmental assessment system in Lebanon and it concluded that: “the World Bank's EA policy, the EC Directive on EIA, and the Lebanese EIA system have many common features and are comparable in many aspects. There are, however, two significant gaps, namely the lack of standard TORs and guidelines for specific sectors and a lack of public consultation and disclosure of the EIA summary and Initial Environment Examination (IEE) to the public as required by articles 13 and 14 of the Environment Protection Law”. After the issue of the CEA report in 2011 the EIA Decree 8633/2012 was issued providing detailed scope of work and procedures for IEEs and EIAs. Also, Decisions 260/1-261/1 of 2015, as indicated above, provided consistent approach for reviewing different instruments. However, the consultation/disclosure issue remains to be a gap in the existing system.

It is worth noting that the EIA system in Lebanon was also assessed during the preparation of the Lebanon Environmental Pollution Abatement Project (LEPAP)³³ and above conclusions were also recognized. The disclosure gap was overcome by a requirement by the Project to disclose EIA instruments at the MoE website and the Bank’s External website.

Standards for Ambient Environment and Pollutants Emissions

The standards for the quality of ambient environment and the emission standards (air, water and noise) are included in the Ministerial Decisions 1/8 for the year 2001 and 1/52 for the year 1996. The standards are comprehensive and inclusive of different developmental activities and different environmental media.

The ambient air quality standards include the main pollutants for different averaging periods. The air emission standards are given as mass flows and concentrations for different groups of pollutants, and certain standards are given for stack heights.

Ambient water quality standards are given for certain uses of the correspondent water body (enhancing aquatic life and bathing). Discharge standards are given for wastewater discharges to public sewers, inland surface waters and seawater. The standards include design requirements for outfall pipes.

Ambient noise standards are given for morning, evening and nighttime for different areas according to the land use. Occupational noise emission standards are given as maximum exposure periods for certain sound levels.

Generally, the environmental quality standards are comparable with the Environmental Health and Safety (EHS) Guidelines of the World Bank Group (WBG). Some of the standard limits are closer to the

³² MoE issued different Decisions regarding environmental conditions for different types of activities

³³ An IBRD IPF that came to effectiveness in January 2016

interim targets, rather than the guideline figures, however, such differences are not expected to have considerable impacts with regards to the Program interventions.

Annex 3 provides the ambient and emission standards of MoE Decisions 1/8 and 1/52.

Occupational Health and Safety

Occupational Health and Safety (OHS) requirements are mainly included in the Labor Law of 1946 which has been amended several times, with the latest amendment was by Law 207/2000. The Labor Law stipulates that all establishments, subject to this Law, should insure that health and safety standards and working environment should comply with the standards recommended by Ministry of Labor (MoL).

Decree No. 11802/2004 requires that the use of new mechanically powered machines is subject to the approval of the MoL, according to a report prepared by an engineer labor inspector. So, industrial enterprises may not be licensed without such an approval, which is required only for the first time and not required for the renewal of those licenses. The Decree requires that machine guarding measures to be taken to protect workers from dynamic risks in the workplace, and other measures to be taken for protecting from chemical, biological, occupational noise, ionizing radiations risks. There are also special requirements for certain types of machinery (such as pressure vessels). The employer is responsible for meeting those requirements and providing workers with necessary Personal Protection Equipment (PPE), sanitary services, adequate ventilation and aeration, lighting and medical services. The Decree also includes measures for fire safety and adequate handling of hazardous chemicals (with special emphasis on Benzene). Regarding accidents, employers shall report all accidents to the MoL within 24 hours of their occurrence and shall submit to the MoL biannual accident reports. The decree also requires the employers to notify the MoL of occupational diseases as soon as possible and that employers should have contracts with insurance companies to cover the costs of medical treatment and compensations for injured workers.

Further to Decree 11802, Decree 11958/2004 stipulates the OHS requirements for construction works. The Decree includes requirements for different construction activities that have OHS implications, such as scaffoldings, trenching, demolishing, working at heights, working with different equipment, movable stairs, tunneling and digging wells, working underwater ... etc. The Decree clearly defines the responsibilities of the owner of construction sites to ensure protection of construction workers from OHS risks.

Although the laws and Decrees are considered comprehensive, the OHS requirements are fragmented in different Decrees and Decisions, which makes it difficult to owners of workplaces to have reference to the articles relevant to their works.

The labor inspection is carried out by the by Department of Labor Inspection Prevention and Safety (DLIPS) of MoL. The inspection of OHS aspects is regulated through Decree 3273/2000, which also includes inspection on employment conditions and labor protection. The inspections check OHS violations, check the conditions of powered machines and investigates any OHS related diseases and accidents. Given the limited number of OHS inspectors available compared to the large number of enterprises in the country, it is believed that the enforcement of OHS standards needs to be improved to ensure consistent compliance with those standards across the country.

An assessment report carried out by ILO for the OHS system in Lebanon, as part of the Labor standards, concluded that the system needs to improve the following main gaps:

- The work of OHS inspectors should be improved through providing sufficient number of staff to cover the demand with adequate qualifications, training and standard guides and checklists that covers different OHS aspects
- The OHS department should be on a higher hierarchy within the organizational structure of MoL.

- OHS inspection should be better planned and targeting priority and high-risk activities
- The system for notifying, investigating or documenting occupational injuries and disease should be improved.

The scale of Program interventions is not likely to pose serious OHS risks, however, the PAP includes measures to overcoming the above gaps at the levels of MoL (in terms of training and capacity building) and at the level of enterprises and individual workers (in terms of awareness raising and improving worker qualifications).

Natural Habitats

Lebanon is rich of valuable natural habitats that varies between marine habitats, coastal areas, rivers and estuaries, forests and bird important areas. The protection of natural habitats is being done at different levels:

- MoE has declared 13 natural reserves, 18 protected forests and 17 protected sites many of which have also acquired international designations including Ramsar Sites, Special Protected Areas of Mediterranean Importance, Important Bird Areas and World Heritage Areas. Each of those sites is regulated through a Law or Decree that aims at protecting the specific features of those area
- Outside the above protected areas, urban planning of certain areas should be subject to a SEA, as per MoE Decree 8213/2012, that should assess the impacts on natural habitats, and provide specific protection measures, as needed, in the correspondent development plans.
- Areas that does not have a special urban plan are regulated by Decree 2366/2009 which regulates the land use of different areas in the country. The Decree classifies lands to 4 categories (urban, rural, agricultural, and natural including forests, valleys, mounts). The Decree also recognizes areas of specific natural wealth, including those of high aesthetic value, archeological sites and areas vulnerable to natural risks. The Decree aims at protecting natural resources and historical sites during planning different areas in the country.
- In general, cutting of trees for any reason should be approved my Ministry of Agriculture (MOA) and should be compensated for as per MOA Decision 783/1 dated 25/11/2010.

The legislative framework for protection of natural habitats is quite comprehensive, and the protected areas are provided with means for keeping their features. However, the main threats to natural habitats in are the unregulated developments and activities (such as unregulated hunting and informal developments). The strong civil society mitigates such threats and minimizes the risks of unregulated/unlicensed activities.

Physical Cultural Resources

Lebanon is the land of several civilizations since the history of mankind. The country is rich of archeological sites that are of high cultural value, and it is believed that there is a wealth of undiscovered sites in different parts of the country.

The protection of archeological sites is regulated through Law 37/2010, which provides definitions of Physical Cultural Resources (PCR) and regulates ownership, protection and maintenance of those PCRs. According to the Law all immovable PCRs are property of the Ministry of Culture (MOC) while some movable PCRs (such as manuscripts and geological plant and animal pieces) could be property of other ministries. In all cases PCRs should be registered and protected. PCRs should not be transferred or maintained except with special permit from the Minister of Culture.

Further to Law 37/2010, the above-mentioned Decrees (SEA Decree 8213/2012 and Land Planning Decree 2366/2009) would provide protection to registered and known PCRs from new developments. Again, the main challenge would be from unregulated developments, especially regarding unknown PCRs, however, this risk could be mitigated through ensuring timely intervention of the Directorate General of Antiquities (DGA) in case of chance finds. Usually DGA is providing supervision to construction sites in areas likely to have buried PCRs.

Irrigation and Agriculture

The use of water for irrigation is subject to Law 221/2000, where abstraction of irrigation water from rivers and groundwater is not allowed without license from the Ministry of Energy and Water. The main gap is in implementing the law especially that most of the wells in the country are unlicensed and due to the unplanned development of those wells aquifers suffer from overexploitation and salt water intrusion.

For the use of pesticides, Ministry of Agriculture has a registry of permissible pesticides, that are not banned due to their toxicity, and according to Decision 546/1 no packaging, selling or distribution of pesticides is allowed except after being registered and analyzed. Lebanon is signatory of the Stockholm POPs Agreement, and the government does not register banned pesticides for their toxicity. However, the main gap in the system is that there is a wide market for unregistered pesticides.

Compliance with Environmental Legislation

According to Law 444/2002, enterprises with potential environmental risks is responsible for self-monitoring their emissions to make sure that the standards are complied with. In case of any damage or major pollution incident the enterprise should timely inform MoE and the local authorities about the damage so that remediation measures could be taken. The MoE is mandated to inspect and monitor the compliance with relevant environmental standards, and to ensure that EMP measures in approved EIAs are effectively implemented. However, in practice, the self-monitoring is not performed except for a number of large polluters (such as cement industries), and MoE does not have sufficient staff to effectively monitor and inspect all enterprises in the country. This was recognized by the 2011 CEO: *“There is a lack of follow-up and implementation on the EMP for other sectors due to staff constraints, budget issues, and appropriate procedures for monitoring and follow-up on the EIA and IEE”*.

An Environmental Compliance Decree (Decree No. 8471/2012) was issued in July 2012. The decree stipulates that industrial enterprises are required to obtain an Environmental Compliance Certificate (ECC), as a proof for its environmental performance, so that such enterprises could be eligible for the economic incentives of Law 444/2002 and Law 690/2005. Environmental compliance would be determined after carrying out an environmental audit to the facility by one of the registered environmental consultancy firms. The audit should be done according to a certain checklist, annexed to the Decree, that checks the facility's consumption of resources, compliance with standards and effectiveness of waste management and general environmental measures. It is worth noting that the LEPAP is providing a financial facility to support enterprises comply with the Decree 8471/2012 and is using the environmental auditing tools to prepare a Compliance Action Plan (CAP) for noncomplying enterprises.

On November 2015, MoE Decision 1/539 gave existing industrial facilities under categories 1, 2 and 3, as per Decree 5243/2001,³⁴ grace periods until end of 2018, 2019 and 2020 respectively for preparing an environmental audit and requesting an ECC. Decision 1/198 for the year 2016 provides certain template to the environmental audit report and provides the mechanism for reviewing audit reports.

The compliance system has been improved by the issue of the Law 251/2014 of establishing a specialized environmental prosecutors and judges. In addition of having this specialized judiciary system, the Law

³⁴ Please refer to Annex 2

stipulated that each governorate should have a local department for MoE and that would include an environmental judiciary committee.

On the other hand, despite of the comprehensive laws and regulations for environmental compliance of different facilities, it is still believed that there still important gaps in actual enforcement of environmental standards especially at the level of relatively small-scale facilities. It is expected that gradual improvements will occur as the above grace periods would come into effect.

Legal Framework for the mitigation of social risks

Land acquisition and resettlement

While the Program is unlikely to require any land acquisition or lead to any resettlement, the national framework for land acquisition is provided to understand the procedures that would be followed in the case that minor land acquisition is necessary for any of the infrastructure investments supported under the project.

Expropriation Law No. 58 dated 29/05/1991 (amended on 8/12/2006)

The Lebanese Constitution guards and protects the right of private property including landed property and the rights attached to it. The exercise of eminent domain for expropriating private property in the public interest is governed by this Law. The State may only expropriate rights when it is to be declared in the public interest, and against payment of a prior and equitable compensation (*“indemnité equitable”*). All compensation is made in the form of a financial award through legal assessment, and the process of expropriation itself cannot be halted unless the validity of the public interest decree itself is challenged. At least 65% of the compensation is paid in advance when there is an appeal, and if no structures are found to be existing within expropriation limits, an additional 25% is paid and the expropriation party reserves the right (only if it wishes so) to hold the remaining 10% until the decision of takeover is issued.

The Law of expropriation establishes general provisions for prior compensation of expropriated assets, and easement fees for other restrictions imposed on property. The mode of payment when compensating for acquisition of land will in practice be in several phases, but no defined time lag exists between taking over of land and final payment.

Compensation is determined by the Expropriation Commission set up by a decree according to proposals from the relevant ministers. The decisions of the Preliminary Commission may be appealed to the Appeals Commission by the MEHE or the individual property owner and the appellant must be represented by a lawyer.

The Lebanese Expropriation Law also reserves the right for an Expropriating Authority to “partially expropriate” a land in public interest. This procedure is initiated when there is a need to use the “above surface” or “below ground” of a piece of land.

The imposition of partial expropriation rights requires establishing an Easement Right Decree. Issuing this decree requires exactly the same procedures as in “full expropriation”. The difference between the two processes appears only in estimating the compensation where in this case, the owner is compensated for allowing the use of parts of the property (above or below) and for being subject to some restrictions on the use of the land. The indemnity would be estimated by the Commission on a case by case basis depending on the depth of the tunnel and the nature of restrictions and based on the principle of full and prior compensation. As publicly available files indicate, normally 10% of the compensation amount for a full expropriation will be awarded.

Tenancy Law

The rent law enacted in 1991 gives the land owner the right to retrieve the property at the end of the contract. Where expropriation causes loss of tenancy, expropriation commissions divide their awards

between landlords and tenants according to the economic value of the tenancy, enabling tenants to secure alternative housing by rental or down payment for purchase.

Land Tenure

In Lebanon, there is generally little contestation over ownership, legal rights or boundaries of land because plots are generally well surveyed and title is recorded at an administrative service based in the Ministry of Finance (with the exception of areas affected by uncontrolled movement and settlement due to the civil war). The survey unit also maintains cadastral maps that are regularly updated. Since land ownership is recorded in shares, along with all those whoever held title to it, the exact value of any transaction for an individual owner can be determined. In addition, land laws in Lebanon are gender neutral.

Antiquities Law

According to the Antiquities Law of 1933, historic monuments, even those on the General Inventory List, can be either publicly or privately owned. Although archaeological finds are considered state property, the parcels on which archaeological discoveries are made can remain the property of private individuals or institutions. Under this law, private property owners of listed historical buildings are responsible for the repair and maintenance of the structure. The discovery of important archaeological remains could also lead to the expropriation of private property or to limitations on its use. If a building is placed on the list of classified monuments, the owner receives no compensation for the freezing of development rights. However, if the listing is erroneous, the owner may eventually be compensated.

Maritime Public Domain

Lebanese Law provides that the entire intertidal shore is public domain. This law has not been fully enforced. If a certain number of semi-permanent informal business structures have been erected, the owners will be assisted to relocate their businesses outside the Right of Way.

Process for Expropriation

According to the expropriation law, the project proponent, i.e., the institution requiring land, is the party responsible for following the expropriation procedures and preparing the expropriation draft decrees for signature by the Council of Ministers (COM). Once approved by the COM, the Expropriation Decree is published in the Official Gazette and the details of the land to be taken are published in two national newspapers for a period of 15 days. Thereafter, the Decree should be executed within a period that does not exceed eight years from the date of publication. The following annexes should be added to the decree:

- A plan of the project area;
- A detailed plan of the properties to be expropriated
- A list presenting every property registration number, its location, the names of all owners and right holders as recoded in the Real Estate Registry; and,
- A detailed list of the contents of the properties and detailed plans of buildings constructed prior to the publication of the decree.

The complete set of documents is made available for public access at relevant government offices and posted at the municipal offices in which the properties to be acquired are located.

Compensation

Regarding compensation, the Lebanese Expropriation Commission determines compensation based on prevailing local market rates. Every factor that affects its value is taken into consideration, and transition costs are accounted for. Indemnities, however, are paid after the Take-over Decision is signed by the Head of the Expropriating Administration, and take-over can be executed within 15 days of the date of Notification for vacant lands and within 30 days for lands and buildings. Nevertheless, indemnification money is placed and

secured in an account before the take-over decision is signed and concerned parties are informed that they can cash their indemnities. Also, concerned parties have the right to appeal should they not be satisfied with the compensation amount.

Rights of the Forcibly Displaced

As the Program aims to benefit refugees, and all activities directly or indirectly impact the lives of refugees and host communities, it is important to understand the rights of refugees in the country.

It is key to note that Lebanon has not ratified the 1951 UN Convention on Refugees and it has not adopted any domestic legislation specifically addressing the rights of refugees. Not being legally recognized as refugees means that legally they are treated in the same way as are any other foreign nationals. However, there is an MOU signed between the Government of Lebanon and UNHCR that provides a mechanism for the “issuing of temporary residence permits to asylum seekers.” Under the terms of the MOU, the UNHCR adjudicates claims for asylum and the government issues a temporary residence permit, normally for three months but possibly extended to six to nine months.³⁵

The domestic legislation that governs refugees in Lebanon is the Law Regulating the Entry and Stay of Foreigners in Lebanon and their Exit from the Country, which was enacted in 1962 (1962 Law). The relevant provisions of this law are articles 26, 31, and 32.³⁶

- Article 26 stipulates that: Any foreigners who is subject of pursuit or has been convicted for a political crime by a non-Lebanese authority or whose life or freedom is threatened because of political considerations may ask for political asylum.
- Article 31 stipulates that: If a decision to expel a political refugee has been made it is not permissible to deport such refugee to the territory of a state where his life or freedom are not secured.
- Article 32 states that foreigners who enter Lebanon illegally can be imprisoned for one month to 3 years and/or fined.³⁷

As of October 2014, the Policy on Syrian Displacement, adopted by the Cabinet on 23 October 2014, requires that Syrians crossing the border register a reason for entry into Lebanon. Reasons can include tourism, work visit, trade, owning or leasing property, study, travel, health treatment, or embassy consultation. Syrians who do not have such reasons to enter must have a Lebanese sponsor. At the same time that these measures were put in place, UNHCR was also asked to stop registering displaced Syrians, and can now only do to with the approval of the Ministry of Social Affairs.³⁸

The General Directorate of General Security has published instructions on the entry of Syrians into Lebanon. These assign different lengths of stay and require different supporting documentation depending on the purpose of stay. These instructions stipulate that “no Syrian shall be permitted to enter as a refugee save in exceptional circumstances as shall be later determined in coordination with the Ministry of Social Affairs” They further state that “Syrians previously registered as refugees will be allowed to reenter if they meet the

³⁵ Library of Congress (2016). *Refugee Law and Policy: Lebanon*. Available at <https://www.loc.gov/law/help/refugee-law/lebanon.php>

³⁶ Ibid.

³⁷ Ibid.

³⁸ ILO (2015) *Towards Decent Work in Lebanon: Issues and Challenges in Light of the Syrian Refugee Crisis*. ILO (2015) *Towards Decent Work in Lebanon: Issues and Challenges in Light of the Syrian Refugee Crisis*. http://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_559668.pdf

conditions set out in this memorandum”³⁹ In January 2015, the General Directorate of General Security published a directive stating that “a notarized commitment not to seek employment shall be provided when renewing temporary residency permits . . . by Syrian refugees holding UNHCR certificates.”⁴⁰ The commitment not to seek employment was replaced in June 2016 with a ‘Pledge to abide by Lebanese Laws.’ This means that Syrian refugees currently can obtain a valid residency permit in Lebanon either through a UNHCR registration certificate or by receiving sponsorship from a Lebanese citizen.⁴²

However, in practice the country accepts Syrians fleeing from the war and considers them ‘displaced persons.’ The Government has established an inter-ministerial crisis cell to address issues related to the Syrian crisis, and in particular to the issue of displacement. The Government also respects the customary international law principle of nonrefoulement, and under human rights law, not to return anyone to a place where they would face a real risk of persecution, torture or other ill-treatment, or a threat to life.⁴³ In fact, regardless of whether refugees are registered or not, they receive humanitarian assistance from UNHCR (in the case of Syrian Nationals) or from UNRWA (in the case of Palestinian Refugees from Syria.)⁴⁴ Refugees also receive services and basic necessities within host communities.⁴⁵

Labor laws

The 1946 Labor code requires that all workers have contracts, but these may be written or oral.

- Article 26 states that “the employer may not discriminate between working men and women with regard to: type of work, amount of wage or salary, employment, promotion, professional qualification and apparel.”
- Article 27 says that “the employment of women is forbidden in all those industries and jobs listed in Annex 1,” which include a variety of industrial and construction jobs. Women are entitled to 10 weeks of maternity leave. (Law 267)
- The maximum amount of work per week is 48 hours (Art. 31). ‘In cases of emergency,’ workers may be asked to work up to 12 hours per day, provided that ‘the wage or salary for the overtime is 50% higher than the normal work hours.’ Workers are entitled one hour of rest after five (for women) or six (for men) hours. Workers are also entitled to 36 unbroken hours of rest every week (Art. 36) Workers are entitled to a two-day paid absence in the case of the death of a family member (Art. 38) and fifteen days of leave with full pay every year (Art. 39) Article 40 also mandates paid sick leave for workers.
- Minimum wage requirements are outlined in Chapter 4 of the 1946 Labor Code. Payments must be made at a minimum every 15 days and salaries must be fully paid within the fortnight following the

³⁹ Library of Congress (2016). *Refugee Law and Policy: Lebanon*. Available at <https://www.loc.gov/law/help/refugee-law/lebanon.php>

⁴⁰ Ibid.

⁴¹ ILO (2015) *Towards Decent Work in Lebanon: Issues and Challenges in Light of the Syrian Refugee Crisis*. http://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_559668.pdf

⁴² Ibid

⁴³ Library of Congress (2016). *Refugee Law and Policy: Lebanon*. Available at <https://www.loc.gov/law/help/refugee-law/lebanon.php>

⁴⁴ SNAP (2013) in ILO (2015) *Towards Decent Work in Lebanon: Issues and Challenges in Light of the Syrian Refugee Crisis*. http://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_559668.pdf

⁴⁵ ILO (2015) *Towards Decent Work in Lebanon: Issues and Challenges in Light of the Syrian Refugee Crisis*. http://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_559668.pdf

delivery of a piece of work (Art. 47) Title II of the 1946 Labor Code outlines the provisions for dismissal, including requirements for advance notice and severance.

- Title 3 of the 1946 Labor Code establishes the mechanism for arbitration. It states that arbitration boards would be established in each Mohafazat. Such boards would address issues including minimum pay, labor accidents, and disputes about dismissal, fines, dereliction of work, etc.
- Title 4 of the 1946 Labor Code establishes the right to form and belong to trade unions. Foreign workers with a permit can join such trade unions and can have one delegate to represent their interests.

Domestic workers, agricultural corporations, family owned and operated businesses, casual wage earners in municipal and government services are exempted from this law. In fact, in practice, there is a large amount of informality in the labor market. These workers do not have work contracts and are not covered by social security.⁴⁶ It is difficult to know these workers' working conditions.

In summary, the Lebanese Labor Legislation provides a great deal of protections for workers that are not exempted from the law. Those that are exempt continue to be at risk of poor working conditions sanctioned by the law. Other workers, however, are also at risk for poor working conditions because of the lack of institutional capacity for enforcement of the labor legislation.

Child Labor

The 1946 Labor code requires businesses that employ workers under the age of 16 to report this to the Social Affairs Service. Establishing the age of the children to be employed is the responsibility of the employer (Art. 24). No children under the age of 14 are allowed to work as per this code. Children between the ages of 14 and 18 “may only begin to work after a medical examination to ascertain he can carry out the work for which he was hired.” (Art. 22) A number of industrial and construction tasks are forbidden for adolescents under the age of 16 (Art. 23). Art. 23 also states that children under the age of 18 may not work more than six hours a day, with a break of one hour if work exceeds four hours in a day. Adolescents may not work between 7pm and 7am and must have thirteen hours of rest between period of work. Parents and employers are penally responsible for enforcement of provisions regarding children. (Art. 30)

Decree No. 8987, endorsed by the Lebanese Government and signed by the President of the Republic in September 2012, prohibits the employment of children under the age of 16 and states that all types of work that may harm the health, safety or morals of children are completely prohibited in Lebanon. It also defines a new list of the most hazardous types of work. In September 2013, the Government of Lebanon adopted a National Action Plan (NAP) to Eliminate the Worst Forms of Child Labor in Lebanon by 2016.

Again, the Lebanese legislation does provide some mechanisms to prevent child labor and some measures to prevent poor working conditions for those older children that are allowed to work. However, there is a lack of evidence of whether these measures are in fact enforced, and whether there would be capacity to enforce them within the Ministry of Labor.

Foreign and Migrant Workers

Foreigners who wish to work in Lebanon are required to obtain a work permit from the Ministry of Labor. Artists can request their permit from the Directorate of the General Security (Decree 17561 – 18

⁴⁶ ILO (2015) *Towards Decent Work in Lebanon: Issues and Challenges in Light of the Syrian Refugee Crisis*.
http://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_559668.pdf

September 1964)^{47 48} Obtaining a work permit requires the foreign worker to submit an employer's confirmation that they will be employing the worker, unless the foreign worker meets certain conditions (such as being the manager of a firm operating in Lebanon, being married to a Lebanese citizen, etc.).⁴⁹

Migrant workers are a vulnerable group in Lebanon. Domestic workers, in particular, are subject to the *kafala* system, a system whereby the worker is sponsored by a local citizen or company who is then legally owed a contractual period of continuous service from that worker. The sponsors are able to prevent the worker from leaving the country or change jobs and are required to report to the immigration authorities if the migrant leaves their employment. The *kafala* system prevents workers from seeking or receiving help, as they face arrest or deportation if they try to leave their employer.

Migrant workers are also at higher than average risk of human trafficking. Victims of trafficking in Lebanon are granted some protection under Law No. 164, Punishment for the Crime of Trafficking in Persons. The law prescribes penalties for traffickers. However, victims do not have assurance of presenting their views during criminal proceedings and there are no measures to protect victims during these proceedings. Victims can also stay in Lebanon during these proceedings but do not receive a temporary resident permit during this time. 'Migrant domestic workers are excluded from the Labor Code (Art. 7).⁵⁰ An estimated 250,000 migrant domestic workers, primarily from Sri Lanka, Ethiopia, the Philippines, Nepal, and Bangladesh are excluded from labor law protections.⁵¹

According to the IOM, awareness of migrant worker rights is lacking among key stakeholders – workers themselves, employers, law enforcement, labor inspectors and the judiciary.⁵²

Rights to work of the displaced

Before the Syrian crisis, the 1994 Bilateral Labor Agreement between the Republic of Lebanon and Syrian Arab Republic allowed Syrians to enter Lebanon without a visa and receive a six-month temporary residence permit as migrants coming to Lebanon in search of job opportunities. Seasonal workers received a provisional work card, free or charge (but nonrenewable) that allowed workers to bring in family members older than 10 years.

In February 2013, the MOL issued Resolution No. 1/19 (hereafter Res. 1/19) granting Syrians and Palestinians access to professions in construction, electricity, carpentry, blacksmithery, and sales. Other professions were allowed where the foreigners are certified specialists or experts whose work cannot be performed by a Lebanese, or if they have resided in Lebanon since birth, or they were born to a Lebanese mother, or they are managing a company registered in Lebanon. In December 2014, MOL Res. No. 1/197 was issued to annul part of the exceptions introduced by Res. 1/19, reducing the range of professions open to Syrians to agriculture, construction, and cleaning, as well as setting further conditions. Subsequently, on the 19th of December 2015 the Decision no. 1/218 was issued by the Ministry of Labor changed the language indicating that Syrian nationals would be allowed to work in the agriculture, construction and environment sectors (replacing cleaning), confirmed in Decision 1/41 from 31st of January 2017. Under article 3 of Decision 1/41, the minister of labor may consider exemptions to this decision and allow a Lebanese employer

⁴⁷ Important to note that this provision is often abused.

⁴⁸ Decree # 17561 of 18 September 1964. Available at: <https://www.ilo.org/dyn/natlex/docs/SERIAL/39241/97116/F1805533883/LBN-39241.pdf>

⁴⁹Ibid.

⁵⁰ ILO (2015) *The Other Migrant Crisis: Protecting Migrant Workers Against Exploitation in the Middle East and North Africa*. Available at: http://publications.iom.int/system/files/pdf/other_migrant_crisis.pdf

⁵¹ Human Rights Watch (2017) *World Report: Lebanon Events of 2016*. <https://www.hrw.org/world-report/2017/country-chapters/lebanon>

⁵² ILO (2015) *The Other Migrant Crisis: Protecting Migrant Workers Against Exploitation in the Middle East and North Africa*. Available at: http://publications.iom.int/system/files/pdf/other_migrant_crisis.pdf

to recruit a foreigner if they can provide evidence that they failed to find a Lebanese for a specific position after three months of searching, proven through a statement issued by the National Employment Office.

In January 2017, Decision no. 1/49 was put in place. Article four stipulates that the number of foreign workers (regardless of nationality) per company must not exceed 1 foreigner per 10 Lebanese workers. The workers who are fully exempt from this rule are domestic workers, Palestinian refugees, and agricultural workers who work for individuals on the basis of one worker per 5000 square meters. Modified ratios apply to cleaning companies, where there is a maximum ratio of 10 foreigners to one Lebanese, and construction or equivalent work where there can be one foreign worker per Lebanese worker.

The impacts of the legislation on the rights of the displaced to work are unclear. It is clear that displaced Syrians have largely worked in construction, agriculture, and environmental sectors, where they are allowed to work. However, many of these individuals continue to work without contracts or other work agreements, perhaps because of the complexity of the process to get these agreements in place, or perhaps because of a lack of information about this right and how it grants protections under the law. However, because the MOL does not have the capacity to monitor for compliance with national labor legislation, Syrian workers continue to work informally without any consequences to their status in the country.

Transparency, participation and complaints handling

Lebanese law supports freedom of speech, assembly and association. Individuals are free to criticize the government but cannot publicly criticize the President. There are many independent media outlets, although some are politically affiliated. The law does allow for censorship, but only in cases where material is considered a threat to national security. Citizens that wish to assemble may do so with permission from the Ministry of Interior.

There are no laws requiring access to public documents and the government generally does not respond to requests for documents. Complaints about government activities are usually handled by specific government institutions. For this Program, the following are relevant:

Complaints Handling at the Ministry of Environment: The Ministry of Environment has five means to make environmental complaints: a hotline [number 1789], a fax [number +961 1 976535], an email address [complaints@moe.gov.lb], a regular courier and written complaints delivered to the MOE regional departments. Once registered, complaints are channeled to the Regional Departments & Environmental Police Service within the MOE to register, investigate and document the complaints. Afterwards, the documented complaints are sent to the relevant department(s) within MOE to determine means (legal, etc.) and apply the law to address complaints. However, the integrated information management system (e.g., feedback, appeal and resolution) is incomplete and this system is being set up under the ongoing Support to Reforms – Environmental Governance at the MOE funded by the European Union.

Complaints related to labor, forced labor, and human trafficking: The hotline at the Ministry of Labor, was recently upgraded to become available for all workers 24/7 whereby calls are transferred from the hotline number (1740 phones of six social workers outside of working hours. There is also the General Directorate of General Security hotline, which was established in 2014, and is available 24/7 in Arabic. Government representatives indicated that the indicators for hotline operators to identify victims have recently improved, providing clearer guide for operators. NGOs, such as Caritas and KAFA, also maintain hotlines. This is an area currently under development; in early 2015, a memorandum of understanding was signed between Caritas and the Ministry of Justice regarding an upcoming project to implement a hotline at the Ministry of Justice, to be accessible 24/7.

Perhaps more importantly, in Lebanon there is no practice of transparency and complaints handling in public institutions. Although some of these grievance redress and complaints handling mechanisms are in place, the rate of usage and trust in these mechanisms is low.

Special conditions in the Tripoli Special Economic Zone

The Tripoli Special Economic Zone is governed by the following regulations:

- Law no. 18, issued on 5/9/2008 On Establishing the Tripoli Economic Zone;
- Decree No. 2222 issued on 11/06/2009 On the Financial Regulations of the General Authority for the Special Economic Zone in Tripoli;
- Decree No. 2226 of June 11, 2009 On the General Authority of the Tripoli Economic Zone: Its staff, the terms of appointment, categories, ranks, and salaries of its employees and contractors, and the functions of its administrative bodies;
- Decree no. 2232 of June 11, 2009 On the Terms of Issuing Work Permits to Non-Lebanese Persons Wishing to Work in the Tripoli Economic Zone;
- Decree no. 1791 of April 23, 2009 On Authorizing the Occupancy of Part of the Maritime Public Properties to Establish the Tripoli Economic Zone;
- Decree no. 2220 of June 11, 2009 On the Customs Procedures Applicable to the Tripoli Economic Zone;
- Decree no. 2221 of June 11, 2009 On the Terms of Issuing Visas to the Entrants to the Tripoli Economic Zone;
- Decree no. 2232 of June 11, 2009 On the Terms of Issuing Work Permits to Non-Lebanese Persons Wishing to Work in the Tripoli Economic Zone;
- Decree no. 2267 of June 15, 2009 On Environmental Protection and Public Health Requirements in the Tripoli Economic Zone; and
- Decree no. 2407 of June 20, 2009 On the Honorarium of the Chairman of the General Authority of the Tripoli Economic Zone, and the Board of Directors' Attendance Honoraria of the General Authority's Chairman, Members, and Government Commissioner.

The TSEZ laws and regulations establish the aspects of national legislation that apply in the zone, establishes rules that supersede the national legislation in the zone, and determine other rules and regulations that will be in place in the designated area. The social issue that is most relevant when it comes to assessing the TSEZ laws, bylaws and regulations, is labor.

In terms of labor, the TSEZA lawyer states that the national labor legislation is in force in the TSEZ. However, there are certain areas of the TSEZ law that have been modified to increase the implementability of the labor legislation and make the TSEZ a more attractive location of operation for investors. Chapter 6 of the TSEZ law (Law no. 18, issued on 5/9/2008 on Establishing the Tripoli Economic Zone) states the following:

Chapter 6- Employment System and Social Security

Article 28- Notwithstanding any other opposing text, the employment relationship arising between the workers and enterprises of the zone with regard to salaries and discharge shall be subject to the contractual agreements made between the parties.

Article 29- The Authority shall receive the work permit applications or work renewal applications of employers and workers who entered the Lebanese territories to work in the zone. The Authority may grant or

renew such permits that are restricted to the zone, in accordance with the provisions of Article 8 of the present law.

Article 30- A non-Lebanese owner of a licensed investment project shall be issued a permit to work in the zone, irrespective of the nature of their investment project, and subject to the provisions of Article 33 of the present law.

Article 31- The employees and workers of investment enterprises established in the zone shall be excluded from the Social Security provisions.

The employers who recruit said workers in the zone shall be exempt from the obligation to declare, register, and pay contributions to the National Social Security Fund.

Employers benefiting from the abovementioned exemptions shall provide their workers and their dependants with health benefit plans that are comparable or superior to those provided by the National Social Security Fund.

The Authority shall verify the employers' observance of said obligations.

In essence, there are two potential social risks arising from this law:

1. Employers and employees may contractually agree to salaries and discharge rules different than those in the national legislation. This could increase vulnerability of those with no other work options than those offered at less than the established minimum wage.
2. Employees and workers of investment enterprises are excluded from social security provisions, and their employers do not have to pay into the National Security Fund; however, employers are required to provide employees plans comparable to or superior to those of the National Social Security Fund. However, it is unclear how 'comparable' is defined and how it will be verified.

The TSEZ regulations make it possible for foreign workers to work on the site. Decree no. 2221 of June 11, 2009 states that "A visa and residence permit valid for three months and renewable up to one year shall be issued at the airport and border posts to the non-Lebanese investors and entrepreneurs arriving to visit the Tripoli Economic Zone, in addition to the family members, helpers, and drivers accompanying them...Entrants to the Zone shall be granted a one-month pre-visa to obtain a work permit, provided that:

- The visa applicant holds an invitation sent by their prospective employer in the Zone/ signed by the competent official at the Authority.
- The visa applicant obtains a pre-consent for the work permit, issued by the same competent official at the Authority.

In addition, Decree no. 2232 of June 11, 2009 states that "A work permit issued by virtue of the present Decree enables its recipient to work in the zone strictly. If the relationship between the employer and the employee ends without the employee entering into a new work contract within a maximum of one month, the work permit of the employee shall be cancelled. For an employee holding a permit to work in the zone, the transition from one job to another shall be subject to a pre-consent by the Authority."

The Zone Law provides no explicit protections for female workers, for management and supervision of labor rights, for worker codes of conduct, or to protect nearby communities from potential labor influx.

Assessment of the Program Environmental and Social Systems

Eligibility of Program Investments

The interventions of the PforR should not cause significant, adverse, environmental and social impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people. All such interventions should be screened out from the Program investments under the DLIs that could include such interventions as follows:

- DLI 1: Projects under the 5 feasibility studies for PPP interventions (DLR1.2) and the 2 PPP contracts (DLR 1.3)
- DLI 2: SMEs benefiting from loans using movable assets registered (DLR 2.4)
- DLI 5: Facilities occupying TSEZ and signing lease agreements (DLR 5.3)
- DLI 6: Facilities benefiting from the value chain program (DLR 6.1 and 6.2)

As a general rule, all interventions included in Annex I of Decree 8633/2012 or those interventions in Annex II that are located in sensitive areas (natural protectorate – habitats of endangered species – wetlands – natural shores of the sea, rivers and springs) will be excluded.

As TSEZ will have cumulative impacts, a screening form, following the requirements of the Guidance Notes of Bank Policy Program for Results Financing, was prepared at an early stage of the Program preparation to assess whether this intervention would be regarded environmentally significant, diverse, or unprecedented. This screening exercise concluded that the investment in TSEZ is eligible if no high-risk industries are included. The screening form is in Annex 4.

During the Program implementation, if any activity that is not included in the of Decree 8633/2012 lists, or included in Annex I list but the correspondent implementing agency believes that the location and scale of this activity do not fall under the exclusion definition of the PforR policy,⁵³ a screening report similar to this prepared for TSEZ (in Annex 4) should be prepared and approved by the IVA before counting this investment within the results if the correspondent DLI. Although included in Annex II of Decree 8633/2012, all tobacco related manufacturing and trading should be excluded from the Program interventions due to their serious health impacts on end users.

Assessment of the Environmental System against the Core Principles

The environmental regulatory system in Lebanon, as presented in Chapter 4, is comprehensive and covers different environmental aspects related to the NJP interventions. The environmental expertise in the country is very strong and the registered environmental consultancy firms have good capacity. The civil society and environmental NGOs are also very active,⁵⁴ and the media has strong interest in environmental issues. However, the monitoring and enforcement are rather lagging due to the limited manpower available to implementing agencies and the spread of unregulated/unlicensed activities.

The NJP implementing agencies, generally, have limited track record of environmental management as this is not one of their mandates. The environmental management capacity of the system falls mainly on correspondent authorities implementing different laws and regulations (MoE, MoL, DGA ... etc.) as indicated

⁵³ Some activities under Annex I of Decree 8633/2012 may be, according to the scale and location, eligible to PforR finance. For example, the practice in other PforRs is that small wastewater treatment plants, although included in Annex I of Decree 8633/2012, are not considered of significant adverse environmental and social impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people.

⁵⁴ According to the CEA: "There is also a vibrant civil society and a strong media that supports environmental protection"

in Chapter 5. However, project proponents are responsible for ensuring the compliance of their projects to environmental regulations and standards and the capacity for this would vary according to the management commitment, of project proponents, and willingness to invest in mobilizing technical expertise and financial resources necessary for maintaining environmental compliance. Those institutional gaps of NJP implementing agencies and stakeholders would be bridged through:

- Assigning an Environmental Specialist at the PEU level to have the overall responsibility for ensuring that different implementing agencies are making sure that their correspondent beneficiaries are fulfilling the requirements of the environmental system and the additional measures of the PAP (summarized in the table below). The specialist could be assisted by other specialists, according to the work load, during the course of the Program implementation to support the implementing agencies and the Program beneficiaries.
- Making sure the NJP beneficiaries have valid license that includes an approved IEE or ECC as relevant

For TSEZ, because there will be new special regulations for attracting regional and global investors, it is expected that this will include special environmental regulations that will be informed by the recommendations of the SEA currently being prepared. Those regulations would aim to screen out activities with significant impacts, and to make sure that pollution loads from the accommodated activities are within the assimilative capacity of the environment and the city infrastructure. Therefore, the findings of the SEA interim baseline report, summarized in Chapter 3, would be the base for developing the masterplan and the environmental regulations of the zone. On the institutional aspects, CDR would manage the infrastructure construction of TSEZ, and therefore would make sure the contractors and supervising engineers will have sufficient capacity to effectively implement environmental measures during construction, while during operation TSEZ will have an Environmental Department that will monitor the environmental performance of tenants and make sure they comply with the environmental standards of the zone. Issuing the environmental regulations of TSEZ and forming/staffing of the Environmental Department with adequate expertise will be part of the verification of DLI 6.

The gaps in the national system, as per the core principles of Bank Policy Program for Results Financing, are summarized in the table below.

TABLE 1: SUMMARY OF ENVIRONMENTAL SYSTEM ASSESSMENT AGAINST THE CORE PRINCIPLES OF BANK POLICY PROGRAM FOR RESULTS FINANCING

Core principle	Assessment	Proposed measures to strengthen the system
<p>Environmental and social management procedures and processes are designed to promote environmental and social sustainability in the program design; avoid, minimize, or mitigate adverse impacts; and promote informed decision-making relating to the program's environmental and social impacts.</p>	<p>The Environmental assessment system of the country allows of identifying high risk activities, inform decision makers about such activities and the best environmental alternatives for certain developments, adequately assess the environmental impacts and identify mitigation measures for them. The main identified gaps are:</p> <ul style="list-style-type: none"> • No requirement for disclosing IEEs • No sufficient capacity for effective supervision of EMPs and compliance against environmental regulation and standards • Some existing facilities were established without an environmental assessment instrument and without certain environmental management requirements 	<ul style="list-style-type: none"> • Projects that have significant environmental impacts (included in Annex I of Decree 8633/2012, in Annex II but within a sensitive area or under category 1 per Decree 5243/2001)⁵⁵ and activities that include tobacco processing and trading are ineligible for NJP support • No new project, subject to environmental assessment per Decree 8633/2012, should be approved by the implementing agency except after the approval of MoE on the environmental assessment instrument. • Existing projects/facilities that are subject to ECC (Categories 2 and 3 of Decree 5243/2001) should have a valid ECC from MoE to be eligible for NJP support. Also, Category 2 and 3 facilities that started operation through the NJP support (after having an approved IEE) should obtain ECC after one year of operation. Technical assistance will be provided for improving environmental compliance of program beneficiaries • Existing facilities not subject to ECC should be committed to apply MoE conditions relevant to their type of industry • Approved IEEs should be disclosed at the website of the correspondent implementing agency of NJP. The parts of IEEs that include specific information about the project that may be unfavorable for disclosure could be excluded.⁵⁶ • TSEZ regulations and masterplan will be informed by SEA findings so that pollution loads generated from TSEZ activities will be within the assimilative capacity of the environment and the existing infrastructure

⁵⁵ Except an adequate screening report is prepared and approved by the IVA as indicated earlier

⁵⁶ During the implementation of LEPAP there was some concerns by private enterprises about disclosing data about the project capacity and designs that could be used by their business competitors, therefore a compromise could be reached that such data could be excluded but the description of environmental impacts and mitigation measures should always be disclosed.

Core principle	Assessment	Proposed measures to strengthen the system
<p>Environmental and social management procedures and processes are designed to avoid, minimize, and mitigate against adverse impacts on natural habitats and physical cultural resources resulting from the program.</p>	<ul style="list-style-type: none"> • The country legal framework is quite comprehensive in protecting natural habitats and PCRs as area planning Decree 2366/2009 is putting clear emphasis on natural habitats and PCRs. All special plans for certain areas should be subject to SEA that will also consider their protection. • Deforestation activities are excluded from the NJP support as they are within Annex I of Decree 8633/2012. The main risks are: • Unregulated activities that may cause damage to habitats or PCRs • Chance finding of movable PCRs during construction works without adequate supervision 	<ul style="list-style-type: none"> • Ensure that PforR beneficiaries have valid licenses and adequate environmental assessment instruments • All construction contracts should have a condition for adequate protection of PCR through a chance find management process that includes prompt notification of DGA of any findings • Projects that would need to cut trees for site clearance should obtain permit from MoA with adequate compensation measures.

Core principle	Assessment	Proposed measures to strengthen the system
<p>Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the program; (ii) exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the Program; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards</p>	<p>The OHS regulations covers different aspects that pose risk to workers, however, the enforcement and monitoring of those regulations are not highly effective. The OHS awareness is quite weak among the workforce and employers. The handling of hazardous chemicals and wastes are adequately covered through Law 444/2002 and are normally addressed in the environmental assessment instruments and MoE environmental conditions for certain sectors, accordingly fulfilling the measures for improving environmental assessment system should include the adequate management of hazardous chemicals and wastes. The constructions in natural hazard areas is regulated also by Decrees regulating EIA, SEA and land planning. The risk will be from unregulated/unlicensed projects</p>	<ul style="list-style-type: none"> •Including OHS training and awareness raising as part of DLI7 •Ensuring OHS aspects are included in environmental assessment instruments (IEEs and environmental audit recommendations) prepared by the Program beneficiaries <p>Technical assistance will be provided for improving OHS compliance of program beneficiaries The TSEZ regulations should include adequate measures for handling of hazardous materials and wastes. This will be informed by the assessment done in the SEA.</p>

Each of the Program implementing agencies will be responsible for implementing the above measures in their correspondent Results Area. An experienced Environmental Specialist that will be recruited at the PEU will oversee and will provide support for the implementation of different measures by different implementing agencies (other than TSEZ which will have a separate arrangement as indicated below). He will ensure that IEEs and ECCs, if any, includes measures for minimizing risks on OHS, natural habitats and PCRs. He will also ensure that construction contracts for all works includes the EMP measures, as recommended in IEEs, and chance finds procedures of PCRs. The environmental specialist should conduct frequent field visits to projects to ensure that environmental measures are implemented on ground as documented in EA instruments.

The TSEZ will have an Environmental Department that will monitor the environmental performance of tenants and make sure they comply with the environmental standards of the zone. Issuing the environmental regulations of TSEZ and forming/staffing of the Environmental Department with adequate expertise will be DLRs for DLI 6.

More detail on how specific measures will be implemented can be found in the recommendations section.

Assessment of the Social System against the Core Principles

As described in Chapter 5, Lebanon does have legislation that addresses most of the key social issues relevant in this project. Some gaps remain, however, and implementation of the legislation varies widely. For example:

- Legislation related to land acquisition and resettlement is followed by the many different government agencies involved. The processes for land acquisition, expropriation, valuation, and compensation are established in the law and agencies responsible for such activities have adequate capacity to carry them out. In the case of this Program, land acquisition activities are likely to be minor. The Government of Lebanon has experience ensuring that any land acquisition activities are carried out in such a way as to comply with Bank Operational Policies, and in particular, there is in-country capacity to prepare RPFs and RAPs. Although these are not the documents that need to be prepared for this Program, the fact that agencies have this experience shows that there is in-country expertise in adequate management of social risks related to land acquisition and resettlement. The gaps that do exist will be filled through guidance on how to restore livelihoods and fully assess resettlement costs that will be set out in the POM.
- Legislation related to labor provides a broad set of rights to Lebanese workers. Enforcement of such legislation, however, is weak. As has been mentioned earlier in this document, the Ministry of Labor does not employ enough inspectors to enforce current regulations. In this Program, the capacity of individual implementing agencies to monitor activities will be built – as part of these monitoring activities, agencies will acquire capacity to ensure that labor regulations are followed.
- Legislation related to labor is weaker when it comes to protecting the rights of non-Lebanese citizens, including migrant workers and refugees. Refugees have limited rights to work, and often work informally. This can become problematic, as it may expose them to poor working conditions or other forms of abuse. Similarly, many migrant workers are restricted to working for those sponsoring them, which can lead to an abusive work environment. In this Program, implementing agencies will be required to monitor worker rights (when applicable) and not to make distinctions based on nationality.

The agencies responsible for implementing the Program have little experience with the country's social risk management systems. However, the Program provides an opportunity both to strengthen the systems themselves, as well as to work with implementing agencies to strengthen their own capacity for social risk management.

TABLE 3: SUMMARY OF SOCIAL SYSTEM ASSESSMENT AGAINST THE CORE PRINCIPLES OF BANK POLICY PROGRAM FOR RESULTS FINANCING

Core principle	Assessment	Proposed measures to strengthen the system
<p>Environmental and social management procedures and processes are designed to promote environmental and social sustainability in the program design; avoid, minimize, or mitigate adverse impacts; and promote informed decision-making relating to the program’s environmental and social impacts.</p>	<p>Risks related to labor remain moderate even despite mitigation. This is because of weak capacity to monitor compliance regulations, and because some regulations themselves indirectly increase vulnerability for social groups.</p>	<ul style="list-style-type: none"> • To mitigate against labor risks, the Program will 1) include in all construction contracts clear language ensuring that the Lebanese labor code will be followed; 2) ensure supervision consultants monitor for labor risks; 3) build the capacity of implementing agencies to understand and identify issues related to forced labor, child labor, and human trafficking. In addition, contracts signed with cooperatives and firms receiving matching grants to support value chains and contracts signed with businesses receiving wage subsidies will also include language requiring the protection of workers. Implementing agencies will also monitor these activities to ensure beneficiaries are complying with local laws. • Support to the TSEZ in developing its regulations and bylaws will require that the TSEZ develop labor regulations that are considered international best practice for SEZs. In particular, regulations and bylaws will be developed to prevent forced labor, human trafficking, and child labor. Foreign workers will also be fully protected under these regulations. • Grievance redress mechanisms will be put in place to address 1) any grievances related to labor rights in the TSEZ including strengthening contractual arrangements to ensure working conditions, including wages and benefits provide workers with at least as much protection as national legislation; 2) any grievances related to working conditions related to other components (one mechanism in each implementing agency); 3) any grievances related to the implementation of the PPP activities.

Core principle	Assessment	Proposed measures to strengthen the system
<p>Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.</p>	<p>The country's social risk management system is adequate for addressing some of the key social risks identified in this document. The Government of Lebanon has sufficient institutional capacity to acquire land while managing social impacts, and technical assistance provided to the client can mitigate against any residual risks in this area.</p>	<p>- Activities that would require land acquisition would be eligible, if social impacts related to land acquisition are assessed to be minor. This could include minor impacts on informal vendors or other economic displacement (expected to have 0 people impacted, and no more than 100 in total per individual activity.)</p> <p>-The POM will detail the measures required to fill any gaps between the national legislation on land acquisition and resettlement and the Bank's policies. This will include measures to restore livelihoods and for compensation/resettlement assistance of formal/informal land users, tenants, etc.</p>
<p>Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.</p>	<p>The Program supports activities that include youth, women and refugees. These groups are broad, and not all members of these groups are vulnerable.</p> <p>Targeting mechanisms will be put in place such that more vulnerable individuals benefit in certain Results Areas.</p>	<p>- Technical assistance will be required to help implementing agencies understand how to target the more vulnerable and how to tailor activities so that more vulnerable individuals are able to benefit.</p>
<p>Avoid exacerbating social conflict, especially in fragile states, post- conflict areas, or areas subject to territorial disputes.</p>	<p>There are no Government systems to mitigate against risks of social cohesion, but Program measures to promote transparency, adequate targeting, and communications will adequately address these risks.</p>	<ul style="list-style-type: none"> • The Program will include activities that build the capacity of implementing agencies to promote transparency, improve targeting and communications, and grievance redress. This is expected to mitigate against social cohesion impacts while also promoting social accountability and avoiding elite capture.

Recommendations

The recommended measures are included in the Program DLIs, the PAP legal covenants and the Technical Assistance provided to the Program as follows.

DLIs:

Environmental and social measures will be part of the verification of achievement of DLRs and DLIs. In particular:

- DLI 5: TSEZ laws, regulations and bylaws will be prepared and issued following the recommendations in this ESSA and agreed upon in the POM. This will include: developing best practice bylaws and regulations on labor (including OHS, labor influx, labor conditions, and labor rights) that provide at least as much protection to workers as the national legislation, and also protects surrounding communities from the impacts of labor influx; clear environmental regulations and bylaws that screen out activities with significant impacts on the environment, as defined in this document; provides for a fully staffed Environmental Department at the TSEZ that includes at least one full time Senior Environmental Specialist and one full time Senior Social Specialist (with an expertise on labor); includes audit/enforcement protocols .The achievement of this DLI will depend on the adequacy of those regulations in addressing the environmental and social issues raised by the SEA and the adequacy of the institutional framework for managing those issues. This will be evaluated by the IVA and the Bank team will make sure that those measures are effectively implemented.
- DLI 7: To mitigate against OHS and other labor-related risks that workers trained under Results Area 3 could face depending on the industry they are trained for, RA 3 will include OHS and labor rights training. The IVA will make sure that this is included as part of the achievement of DLI7.
- The Bank team will review the ToRs and minimum qualifications of the IVA to make sure the above two tasks are effectively implemented.

Program Action Plan (PAP) legal covenants:

The PAP includes measures to ensure recommendations in this ESSA are applied in the implementation of the Program. The PAP includes:

- Measures to ensure that the recommended institutional setup for management environmental and social issues is in place.
- A requirement to adopt a POM, cleared by the Bank, that will outline the activities, processes and standards that will need to be met for environmental and social risk management. The POM will include sections on the selection of program investments, minimum standards for social and environmental risk management and supervision, reporting on social and environmental risk management at the implementing agency and Program level, mechanisms for disclosure, consultation and grievance redress, and specific screening forms and risk management plans.

More specifically, the POM will include the following measures to address **environmental risks**:

- Procedures for applying the exclusion criteria for high risk projects including PPP projects, SMEs and investments in value chains and TSEZ. For PPP projects the HCP will apply the screening criteria for the selected PPP investment. TSEZ will do the same during the licensing of TSEZ investments, where high-risk industries will be excluded. For other Program interventions (SME finance, value chains and matching grants) the PEU will carry out the screening of investments. This will include a process for applying the exclusion criteria for projects involving social and labor risks that cannot be adequately mitigated, or where the implementing agencies do not have the capacity to mitigate risks. The definition

of such projects will also be included in the POM. Screening instruments for different implementing agencies will be included as annexes.

- No new project under Results Areas 1 and 2 (such as PPP projects, beneficiaries receiving matching grants, TSEZ facilities), subject to environmental assessment per Decree 8633/2012, should be approved by the implementing agency except after the approval of the Ministry of Environment (MOE) on the environmental assessment instrument. Approved instruments should be disclosed at the website of the correspondent implementing agency of Program, noting that project description details, that could affect competitiveness of project proponent, could be excluded. For small farming projects (under matching grants) that are not subject to environmental assessment per Decree 8633/2012, the beneficiary should only use licensed source of irrigation and registered pesticides. Copies from irrigation license and pesticides invoices from registered distributors should be submitted to the implementing agency as part of the application requirements.
- Existing projects/facilities, to be supported under Results Area 1 and 2 (such beneficiaries receiving matching grants), that are subject to ECC (Categories 2 and 3 of Decree 5243/2001) should have a valid ECC from MoE to be eligible for Program support. Also, Category 2 and 3 facilities that started operation through the Program support (after having an approved IEE) should obtain ECC after one year of operation. The ECC will include OHS aspects as part of the compliance requirements.
- Existing facilities, to be supported under Results Area 1 and 2, not subject to ECC should be committed to apply MoE conditions relevant to their type of industry. For small farming projects (under matching grants) that are not subject to ECC Decree, the beneficiary should only use licensed source of irrigation and registered pesticides. Copies of irrigation license and pesticides invoices from registered distributors should be submitted to the implementing agency as part of application requirements. Technical assistance will be provided for improving environmental compliance of program beneficiaries.
- All construction contracts should have a condition for adequate protection of PCR chance finds and prompt notification to the implementing agency of these finds and any cutting of trees during site clearance should be permitted by Ministry of Agriculture with adequate compensatory measures.

The POM will include the following measures for managing **social risks** in the following implementing agencies:

PEU

- The TOR for the social specialist.
- Requirements for aggregating reports on social risks.
- Accountability and reporting mechanism for social risk management at the Program level.

HCP

- Processes for screening for social risks, including processes for identifying and managing any potential labor (including labor influx) issues related to PPPs.
- Processes for land acquisition and livelihood restoration that are acceptable for the two PPPs contracted as part of the Program and recommended for all HCP activities.
- The TOR for the social specialist.
- A description of the implementing mechanism for the HCP's GRM.
- Requirements for reporting on social risks.

MOT

- Processes for screening for social risks and in particular temporary or permanent livelihood impacts related to the expansion of the broadband network.
- Processes for consultation and livelihood restoration that are acceptable to address any potential livelihood impacts.
- The TOR for the social consultant.

- A description of the implementing mechanism for the MOT's GRM.
- Requirements for reporting on social risks.

TSEZ

- Minimum criteria for worker rights to be established and clarified in the TSEZ bylaws and regulations. These minimum criteria will provide worker protections at least as good as those provided by the national legislation on labor.
- Draft text to be included in contractor and tenant contracts establishing minimum working conditions required in the TSEZ.
- Processes for monitoring working conditions in the TSEZ and for addressing contractors and tenants that do not provide proper working conditions to their workers.
- Guidelines for assessing and mitigating against any negative impacts of labor influx. A labor influx management plan will also be part of the POM and will include a worker code of conduct.
- The TOR for the social consultant.
- A description of the implementing mechanism for the TSEZ's GRM.
- Requirements for reporting on social risks.

MOET

- Minimum labor conditions and social risk management capacity expected for beneficiaries supported under the value chain support program.
- Processes for screening for social risks and labor conditions during the proposal evaluation process, including a screening form.
- Draft text to be included in matching grant contracts requiring that supporting cooperatives and firms maintain adequate worker protections and report on any social or labor risks identified.
- Process for targeting and communications mechanisms for potential beneficiaries (both for value chain support program and entrepreneurship)
- A description of the implementing mechanism for MOET's GRM.
- Requirements for reporting on social risks.

NEO

- Description of capacities that trainees are expected to acquire on OHS and labor rights.
- Process for targeting and communications mechanisms for potential beneficiaries
- A description of the implementing mechanism for NEO's GRM.
- Requirements for reporting on social risks.

Technical Assistance (TA)

As part of its implementation support, the World Bank will provide technical assistance to the agencies implementing the Program, including:

- Capacity building to support Program beneficiary to comply with environmental, social and OHS requirements, and provide capacity building to MOL to improve their process of ensuring the Labor Code is followed. This could take different forms, such as training and providing relevant consultancy assignments. The details of this will be agreed with MOE and MOL according to the need during the implementation of the TA.
- MOET and NEO will receive technical assistance on beneficiary targeting and communications with beneficiaries.
- All agencies putting in place GRMs will receive technical assistance to put these in place.

Institutional structure for environmental and social management

Each of the implementing agencies will be responsible for implementing the above measures in their correspondent Results Area:

PEU: One full time Environmental Specialist and one half-time Social Specialist will oversee the social and environmental performance of the Program-supported activities in the PEU. The Terms of Reference (TORs) for these individuals will be developed in the POM. The PEU will also oversee and provide support for the implementation of different measures by different implementing agencies (except HCP and TSEZ). S/he will ensure that Initial Environmental Examinations (IEEs) and ECCs, if any, include measures for minimizing risks on OHS, natural habitats and Physical Cultural Resources (PCRs). S/he will also ensure that construction contracts for all works includes the Environmental Management Plan (EMP) measures in IEEs and chance finds procedures of PCRs. The environmental specialist should conduct frequent field visits to projects to ensure that environmental measures are implemented on ground as documented in Environmental Assessment (EA) instruments. The PEU's social specialist will have expertise on social risk management and worker protections. The specialist will make sure that contracts and grants being issued by all relevant implementing agencies include measures to protect workers and that Program investments are monitored to ensure compliance with national labor legislation. The specialist will also work with implementing agencies to help acquire permits for non-Lebanese nationals.

The HCP: The HCP will hire at least one full time Environmental Specialist and at least one part-time Social Specialist to manage environmental and social risks within its whole portfolio. While these individuals are expected to manage risks related to the two PPPs that will be contracted as part of the Program, these individuals are also expected to mainstream and supervise social and environmental risk management throughout the HCPs portfolio.

The TSEZ Authority: The TSEZ Authority will have an Environmental and Social Risk Management Unit that will monitor these risks in the TSEZ. The Unit will include at least one full-time Senior Environmental Specialist who will monitor the environmental performance of tenants and make sure they comply with the environmental standards of the zone. The Unit will also include at least one full-time Senior Social Specialist who will monitor social risk management in the zone, both during its construction phase and during operations. The Senior Social Specialist will have expertise on labor monitoring and labor rights and will also be responsible for managing the GRM in the Authority and for monitoring the impacts of labor influx. The Senior Social Specialist is expected to lead regular consultations with tenants, contractors, workers, and surrounding communities, and to report on all aspects of his/her work.

MOT: Activities implemented by the MOT are not expected to require full time social or environmental expertise. To ensure that the expansion of the broadband network does not negatively impact individuals, permanently or temporarily, the MOT will contract a person with environmental and social screening expertise to screen for impacts before construction works start. If any impacts are identified, including temporary impacts, the MOT will hire a consultant to develop a plan to mitigate against such impacts following the core principles of the guidance provided in the Bank Policy Program for Results Financing. The screening mechanism will be described in the POM. In addition, the MOT will assign a staff member to lead on the implementation of a GRM and report on grievances.

MOET: Activities implemented by the MOET are not expected to require full time social or environmental expertise. To ensure that activities supporting value chains do not inadvertently support cooperatives and firms with poor history of social risk management or poor labor conditions, a screening mechanism will be included in the proposal process for grants/matching grants that are part of this activity. The screening mechanism will be described in the POM. In addition, the MOET will assign a staff member to lead on the implementation of a GRM and report on grievances.

NEO: Activities implemented by the MOET are not expected to require full time social or environmental expertise. TA will be provided to help NEO develop and put in place mechanisms within its programs to manage

communications with beneficiaries, have clear and fair targeting of beneficiaries, and to have mechanisms to include the vulnerable. NEO will assign a staff member to operate a GRM and report on the grievances received and resolved, as per guidance in the POM. NEO will also be providing its targeted beneficiaries training on labor rights and will be coordinating with OHS Department of MOL to provide OHS training.

IVA: The IVA will be responsible for ensuring that results have been achieved as per the standards of the Bank. In the case of DLRs 1.2, 5.1, 7.2, 7.3 and 7.4 the IVA will only determine that these results have been met if they meet the social and environmental standards as outlined in this ESSA, in the SEA and in the POM.

Annex 1: Projects that duly require an EIA study

Annex 1: Projects that duly require an EIA study

1. Irrigation and drainage:

- Building dams, man-made lakes and pools/ponds
- Irrigation projects for area exceeding 500 hectares

2. Drinking water:

- Building dams, reservoirs, pools and man-made lakes
- Water desalination plants
- Integrated projects for drinking water supply

3. Wastewater:

- Establishment of wastewater treatment plants
- Drainage channels into the sea
- Integrated projects for wastewater

4. Solid waste:

- Establishing centers for the management, treatment, and discharge of the various solid waste

5. Agriculture and forestry:

- Preparing land for farming, include leveling, clearing, reclaiming, and using chemicals in agricultural activity
- Deforestation projects

6. Building roads, bridges, railway lines, and tunnels

7. Airports and harbors

8. Power generation and supply:

- Power generating stations
- Power transformation stations

9. Oil and gas:

- Installation of pipelines on/off the beaches
- Excavation and extraction of oil and gas
- Oil refineries
- Oil platforms
- Oil tanks

10. Mines, sanders, stone mills, sand sucking

11. Building hospitals

12. Tourism and recreation projects

- Establishing skiing centers

13. Land reclamation

14. River and sea public properties

15. Inland and marine fisheries

16. Zoo building

17. Factories:

Construction of industrial areas

Industries included in the table below:

ISIC	Description
D	Industry
15	Food industry (heading):
1511	Fresh and preserved meat. Including slaughterhouse
1512	Poultry meat – fresh and preserved, slaughterhouses
1571	Poultry fodder manufacture
1583	Sugar hot/cold
19	Leather industry:
1910	clean, dye, tanning, process, iron (and other works)
21	Paper industry (heading)
2111	Wood pulp
23	Petroleum and coal (heading)
2320	Petroleum refined products, refineries
24	Chemical industries (heading)
2411	Industrial gases capacity= more than 10 tons units/day (Various gas factories)
2414	Various organic chemicals
2415	Fertilizer and nitrogen compounds
2416	Raw plastic material
2420	Insecticides and other agricultural chemical products. See decrees on Agriculture
2430	Paints, varnishes, printing ink production
2461	Explosives (see Law of Ministry of the Interior for explosives)
26	Building material (heading)
2651	Soil blocks – industry
2652	Limestone – industry
2653	Gypsum
2680	Other mining products (non-metal) – not previously specified
27	Raw mineral industry (heading)
2710	Manufacture of iron, steel and metal mixture
2721	Cast iron pipes and accessories (working space = + 1000 M2)
2722	Steel pipes and accessories (working space= + 1000 M2)
2733	Non-alloy iron and steel products (working space = + 1000 M2)
2735	Iron and steel alloys (working space =+ 1000 M2)
2741	Precious metals (Capacity = - 1000 ton/year; and + 1000 ton/year)
2742	Aluminum casting
2743	Lead and zinc products
2744	Copper products (capacity = + 1000 ton/year)
2745	Other nonferrous metals (capacity=+1000 ton/year)
29	Manufacture of machinery (heading)
2960	Weapons and ammunition
31	Various machines and electrical equipment (heading)
3140	Compounds, batters of preliminary cells

34	Transport-related industry (heading)
3410	Car manufacturing
35	Transport (heading)
3511	Ships
37	Remanufacturing (heading)
3710	Remanufacture of paints
3720	Reuse of non-metal waste

Annex 2: Unofficial Translation of Categories of Industrial Facilities per their Environmental Risk as per Decree 5243/2001

IS IC	Description	Category
C	Mining	
10 30	Coal and peat	2
11 10	Crude oil and natural gas (storage tanks and services)	1
11 20	Extraction of materials	3
13	Basic metals (crude)	3
14	Quarries and mining	
14 11	Building stones	2
14 12	Limestone	2
14 13	Sand and gravel	3
14 40	Salt (evaporation)	5
	Packing	4
	Processing	2
14 50	Other unclassified mining products	3
D	Industry	
15	Food industry (heading)	
15 11	Fresh and preserved meat (excluding poultry and slaughterhouses)	3
	Including slaughterhouses	2
15 12	Poultry meat – fresh and preserved excluding slaughterhouses	3
	Including slaughterhouses	2
15 13	Processing all kinds of meat products	3
15 20	Fish products (preserved)	3
	Processed	2
15 31	Processed potato	4
15 32	Fruit and vegetable juice (decree No. 108/83)	4

15 33	Processed and preserved vegetable and fruit – not previously specified, capacity < 25000 ton/year Capacity > 25000 ton/year	4 3
15 41	Raw oils and fats (vegetable, animal)	
15 42	1542 Purified oils and fats (vegetable) Animal	4 3
15 51	Milk derivatives < 1 tons/day 1-2.5 ton/day >2.5 ton/day	5 4 3
15 52	Ice cream and frozen products ready for consumption < 1 tons/day 1-2.6 ton/day >2.5 ton/day	5 4 3
15 61	Grain mill products (capacity < 5 ton/hour > 5 ton/hour	4 2
15 62	Starch and starch products (capacity < 5 ton/hour) > 5 ton/hour	3 2
15 71	Processed fodder for poultry (vegetable) Animal mix Processing	4 3 1
15 72	Processed food for domestic animals	3
15 81	Bakeries	5
	Storage < 5m ³ Storage 5-20 m ³ Storage >20m ³ Flower < 2500 kg/week Flower > 2500 kg/week	5 3 4 3
15 82	Biscuits and preserved confectionary	4
15 83	Sugar cold Hot	3 2
15 84	Cocoa and chocolate	4
15 85	Pasta Processing	4 3

15 86	Tea and coffee – roasting	4
	Roasting and retail selling	5
15 87	Spices	4
15 89	Other food products	4
15 91	Distilled alcoholic drinks – capacity > 10000 liters/year	3
	<10000 liters/year	4
	Bottling	4
15 92	Ethyl alcohol	3
15 93	Alcoholic drinks – capacity > 10000 liters/year	3
	<10000 liters/year	4
	Bottling	4
15 96	Beer	3
15 98	Mineral water, nonalcoholic beverages (see decree No. 108/83)	4
16	Tobacco products (heading)	
16 00	Tobacco products (cigarettes, not cigars)	3
17	Textile products (heading)	
17 10	Textile and threads, weaving and wool manufacture - power of engines < 25 kilowatts)	5
	Power > 25 kilowatts	4
	Use of chemicals and flammable material (whitening or dyeing)	3
17 20	Textile cloth (sewing) - power of engines < 25 kilowatts	5
	Power > 25 kilowatts	4
	Use of chemicals and flammable material (whitening or dyeing)	3
17 30	Complementary textile services (whitening or dyeing)	3
	Other services	4
17 40	Manufactured garments – power < 25 kilowatts	5
	Power 25-100 kilowatts	4
	Power > 100 Kilowatts	3
17 51	Carpets – power < 25 kilowatts	5
	Power 25-100 kilowatts	4

	Power > 100 Kilowatts	3
17 52	Ropes	
17 54	Garments remains	
17 60	Sewed garmets	
17 71	Socks and pantyhose (sewed or tight) – Power < 25 kilowatts	5
	Power > 25 kilowatts	4
	Use of chemicals and flammable material (whitening, dyeing, steam broiler)	3
18	Manufacture of cloth and fur	
18 10	Leather cloths (without manufacture) – Power < 35 kilowatts	5
	Power > 35 kilowatts	4
18 21	Working cloths – Power < 35 kilowatts	5
	Power > 35 kilowatts	4
18 22	Cloth – Power < 35 kilowatts	5
	Power > 35 kilowatts	4
18 23	Underwear – Power < 35 kilowatts	5
	Power > 35 kilowatts	4
18 24	Cloth accessories – Power < 35 kilowatts	5
	Power > 35 kilowatts	4
18 30	Fur – Power < 35 kilowatts	5
	Power > 35 kilowatts	4
19	Leather industry (heading)	
19 10	clean, dye, tanning, process, iron (and other works)	1
19 20	Bags and belts (without leather processing) – Power < 35 kilowatts	5
	Power > 35 kilowatts	4
19 30	Various shoes (– Power < 35 kilowatts	5
	Power > 35 kilowatts	4
	Manufacture of shoe accessories from plastics and chemical compounds	3
20	Furniture and wood industry (heading)	
20 10	Assembled wood – Power < 100 kilowatts	4

	Power > 100 kilowatts	3
	Using solvents	3
20 20	Pressed wood or fiber – Power < 100 kilowatts	4
	Power > 100 kilowatts	3
	Using solvents	3
20 30	Carpentry – Power < 100 kilowatts	4
	Power > 100 kilowatts	3
20 40	Wood containers – Power < 100 kilowatts	4
	Power > 100 kilowatts	3
20 51	Other wood products – Power < 100 kilowatts	4
	Power > 100 kilowatts	3
20 52	Cork and straw	4
21	Paper industry (heading)	
21 11	Wood pulp	1
21 12	Paper and carton paper – without use of chlorine material	3
	Using of chlorine material	2
21 21	Packing materials from paper and carton	5
	From waved carton	4
21 22	Paper products for domestic use	4
21 23	Stationary paper	5
21 52	Different paper and carton products	4
22	Publishing, printing and advertisement (heading)	

2211	Books, printing	5
	Printing and dried in air and fire	3
2212	Newspaper and magazines	5
2214	Audio tapes and compact discs	5
2215	Printing greetings cards – weight < 500 gram/m2 weight > 500 gram/m2	5
	With lead solvents Ultraviolet Ethelene	4
	Graford	2
	Silk – area < 200 m2 Silk – area > 200 m2	2
		3
		3
		5
		4
2222	Printing services	5
2223	Books binding and related services	5
2224	Preparing frames	5
	With ammonia and acid	3
2225	Other printing services	5
2231	Copying audio	5
2232	Copying video	5
23	Petroleum and coal (heading)	
2320	Petroleum refined products, refineries	1
24	Chemical industry (heading)	
2411	Industrial gases – capacity> 10 tons units/day Various gas factories	1
		1
2412	Dyeing	2
2414	Various organic chemicals	2
2415	Fertilizer and nitrogen compounds	1
2416	Raw plastic material	2
2420	Insecticides and other agricultural chemical products. See decrees on Agriculture	1
2430	Paints, varnishes, other paints, printing ink. A mix of paint and ink	2
		3
2441	Basic medical products (see Decree 83/105)	3

2442	Pharmaceuticals (see Decree 83/105)	4
2451	Soap, detergents, polishing, sanitizers	3
2452	Perfume and ornaments	3
2461	Explosives (see Law of Ministry of the Interior for explosives)	1
2462	Glue and gelatin – from raw animal materials Without raw animal materials	3 4
2464	Photography chemicals	3
2466	Other chemicals – not previously specified	3
25	Rubber and plastic (heading)	
2511	Rubber tires and pipes	2
2512	Remanufactures rubber tyres and pipes	2
2513	Other rubber products	2
2521	Plastic plates, pipes and plastic casting	3

2522	plastic products for packing	3
2523	Plastic clothing	3
2524	Other plastic material	3
26	Building material (heading)	
2611	Surface glass – power<100 kilowatts	4
	>100 kilowatts	3
2612	Surface glass fabrication – power<100 kilowatts	4
	>100 kilowatts	3
2613	Void glass – power<100 kilowatts	4
	>100 kilowatts	3
2615	Fabricated glass of different kinds including technical glass equipment – power<100 kilowatts	4
	>100 kilowatts	3
2621	Domestic appliances and ceramic tiles – power<100 kilowatts	4
	>100 kilowatts	3
2622	Ceramic sanitary ware	3
2624	Artistic ceramic products	3
2626	Thermal ceramics	3
2630	Ceramic tiles and bottles	3
2640	Tile, stone, brick products made of dried mud	1
2651	Soil blocks – industry	1
2652	Limestone – industry	1
2653	Gypsum	
2661	Cement blocks – Without compressors and vibrating equipment	4
	Without compressors and vibrating equipment	3
2662	Gypsum products	3
2663	Bricks for mixture – Capacity < 50 ton/day	3
	> 50 ton/day	2
2666	Other gypsum and cement brick products	3
2670	Bricks for memorial buildings	3
2680	Other mining non-metal products – without asbestos	4
	With asbestos	2
2681	Sand scratchers	4
2682	Other mining non-metal products – not previously specified	4

27	Raw metal industry (heading)	
2710	Manufacture of iron, steel and metal mixture	2
2721	Pipes and accessories of cast iron – Working space < 500 m2; Working space between 500 and 1000 m2 Working space > 1000 m2	4 3 2
2722	Steel pipes and accessories – Working space < 500 m2; Working space between 500 and 1000 m2 Working space > 1000 m2	4 3 2
2731	Cold iron products – Working space < 1000 m2; Working space > 1000 m2	4 3
2732	Cold galvanized thin plates < 1000 m2; Working space > 1000 m2	4 3
2733	Non- alloy iron and steel products – Working space < 500 m2;	4

	Working space between 500 and 1000 m2 Working space > 1000 m2	3 2
2734	Metal rail – Working space < 1000 m2; Working space > 1000 m2	4 3
2735	Iron alloys and iron/steel alloys – Working space < 500 m2; Working space between 500 and 1000 m2 Working space > 1000 m2	4 3 2
2741	Precious metals – Working space < 1000 m2; Working space > 1000 m2	4 3
2742	Aluminum assembly casting	4 2
2743	Lead products Zinc and tin products	2 3
2744	Brass products – Working space < 1000 m2; Working space > 1000 m2	3 2
2745	Other nonferrous metal products – Working space < 1000 m2; Working space > 1000 m2	3 2
2751	Iron casting services	3
2753	Light metal casting services	3
2754	Other nonferrous metal casting services	3
28	Metal and electrical technical products (heading)	
2811	Steel structures and its components	3
2812	Metal connections and blacksmithing	4
2821	Metal tanks and containers	3
2822	Radiators and heating boilers	3
2830	Steam generators	3
2840	Shaping, pressing and extruding of metals and powder metallurgy	3
2851	Metal painting treatment services – Electrical Non-electrical	2 3
2861	Cutting tools	4
2862	Working tools	4
2863	Lockers and hinges	4
2871	Steel barrels and containers	3
2872	Containers of light metals	3

2873	Wire products	4
	With chemical insulators	3
2875	Other fabricated metal products – not previously specified	3
29	Machinery industry (machines) (heading)	
2911	Engines and turbines (except aviation, cars, revolving engines)	3
2912	Pumps and compressors	3
2913	Valves and taps	3
2914	Carrier, machine tooth, pushing tools	3
2921	Burners and incinerators	3
2922	Lifting and handling equipment	3
2923	Non- domestic cooling and ventilation equipment	3
2924	Tools and equipment for different uses – not previously specified	3
2931	Agricultural tractors	3

2932	Other machinery for agriculture and forestry	3
2940	Mechanical tools	3
2951	Tools for metal works	3
2952	Equipment for mining and building	3
2953	Equipment for food, drinks and tobacco manufacturing	3
2954	Machines for textile, clothing, and leather works	3
2956	Machines for various purposes – not previously specified	3
2960	Weapons and ammunition	1
2971	Domestic electrical appliances – capacity < 50 ton/year	4
	> 50 ton/year	3
2972	Domestic non-electrical appliances – capacity < 50 ton/year	4
	> 50 ton/year	3
30	Computer and office equipment (heading)	
3001	Production of office equipment	4
3002	Production of computers Assembly	4
		5
31	Production of various electrical machines and equipment (heading)	
3110	Electric engines, generators, transformers	3
3120	Power distribution and control equipment	4
3130	Wires and cables insulated	3
3140	Compounds, batters of preliminary cells – Production Packing	2
		5
3150	Lighting bulbs and equipment	4
3161	Electrical equipment for engines and cars- not previously specified	4
3162	Various electrical equipment – not previously specified	4
32	Audio-visual equipment (video) and communication industry (heading)	
3210	Valves, electronic pipes, other electronic elements	3
3230	Recording telecasters and related products	4
33	Medical and optical equipment (heading)	
3310	Medical and surgical equipment	4

3340	Optical and photographic equipment	4
34	Transport- related industry (heading)	
3410	Car manufacturing	2
3420	Manufacture of wagons; seats for cars, trucks, and trailers	3
3430	Parts and accessories for cars and their engines – Capacity<50 ton/year	4
	>50 ton/year	3
35	Transport (heading)	
3511	Ships	3
3534	Carts for persons of special needs	3
3550	Other transportation means – not previously specified	3
36	Various tools and fitting industry (heading)	

3611	Chairs – Capacity < 50 ton/year > 50 ton/year	4 3
3612	Stationary tools – Capacity < 50 ton/year > 50 ton/year	4 3
3613	Kitchen tools – Capacity < 50 ton/year > 50 ton/year	4 3
3614	Furniture tools – Capacity < 50 ton/year > 50 ton/year	4 3
3615	Beds (with sponge manufacture) – Capacity < 50 ton/year > 50 ton/year	4 3
3622	Jewelry and related arts – not previously specified – Capacity < 1 ton/year > 1 ton/year	5 4
3630		
3640	Sporting equipment and supplies – Capacity < 50 ton/year > 50 ton/year Use of chemicals or flammable material	4 3 3
3650	Toys – Capacity < 50 ton/year > 50 ton/year Use of chemicals or flammable material	4 3 3
3662	Cleansing brushes	4
3663	Other manufactured products – not previously specified	3
37	Remanufacturing (heading)	
3710	Remanufacture of paints	3
3720	Reuse of non-metal waste	2

H		
40		
4000	<p>Generation of electric power, steam and hot water</p> <p>Using power generators in plants is classified according to the plant</p>	1
41		
4100	Extraction and distribution of water	4

Annex 3: Unofficial Translation of the Environmental Quality Standards (Ambient and Emission Standards) per MoE Decisions 1/8 and 1/52

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.

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
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. Provided in column 3 of the Table below, 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.

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

Group III	200	Mass flow > 6,000g/h
Cancer Causing Pollutants		
Group I	0.2	Mass flow > 5g/h
Group II	2	Mass flow > 10g/h
Group III	10	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 per MoE 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:

$$H = h + 0.2\sqrt{kVA} \text{ Where:}$$

H = Total stack height in meters

h = Height of neighboring building in meters

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 neighboring buildings in [m] (inside 50m diameter from the stack or the average building height in the neighborhood);
- 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 per MoE. 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).

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

National Occupational Noise Exposure Standards in Work Areas

Duration per Day (hrs)	Sound Level dB(A)
8	90
4	95
2	100
1	105
¼	110
1/4	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:
 - o Sea bed levels;
 - o Sea bed soils; and
 - o Sea bed stability or movements.

Environmental data:

- o Wind speed frequencies and direction;
- o Local topography and effects on currents, winds and waves; and
- o Shipping, dredging, fishing, shell fishery, bathing and other activities.

Effluent data; and



Receiving water characteristics: o Time for bacteria to die;

- o Horizontal and lateral dispersion coefficients;
- o Vertical dispersion coefficient; and
- o Temperature, salinity and density profiles.

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 mg/l		
	Public Sewers	Surface Water (Inland)	Sea
Color	none	none	none
pH	6-9	6-9	6-9
Temperature	35°	30°	35°
BOD (5 day, 20°C)	125	25	25
COD (dichromate method)	500	125	125
Total Phosphorus	10	10	10
Total Nitrogen1	60	30	30
Suspended solids	600	60	60
AOX	5	5	5
Detergents	-	3	3
Coliform Bacteria	-	2000 per 100 ml	2000 per 100 ml

Salmonellae	absence	absence	absence
Hydrocarbons	20	20	20
Phenol Index	5	0.3	0.3
Oil and grease	50	30	30
Total Organic Carbon (TOC)	750	75	75
Ammonia (NH ₄ +)	-	10	10
Silver (Ag)	0.1	0.1	0.1
Aluminum (Al)	10	10	10
Arsenic (As)	0.1	0.1	0.1
Barium (Ba)	2	2	2
Cadmium (Cd)	0.2	0.2	0.2
Cobalt (Co)	1	0.5	0.5
Chromium total (Cr)	2	2	2
Hexavalent Chromium (Cr VI+)	0.2	0.2	0.2
Copper total (Cu)	1	0.5	1.5
Iron total (Fe)	5	5	5
Mercury total (Hg)	0.05	0.05	0.05
Manganese (Mn)	1	1	1
Nickel total (Ni)	2	0.5	0.5
Lead total (Pb)	1	0.5	0.5
Antimony (Sb)	0.3	0.3	0.3
Tin total (Sn)	2	2	2
Zinc total (Zn)	10	5	5
Active Cl ₂	-	1	1
Cyanides (CN ⁻)	1	0.1	0.1
Fluorides (F)	15	25	25

Nitrate (NO ₃)	-	90	90
Phosphate (PO ₄)	-	5	5
Sulphate (SO ₄)	1,000	1,000	1,000
Sulphide (S ₂ ⁻)	1	1	1
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 in MoE Decision No. 52/1/1996. Defined guide values and maximum admissible limit values are shown in below.

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	50%>9

	100%>7	
pH	-	6-9
Suspended Solids (mg/L)	<25	-
BOD5 (mg/L O2)	<3	-
Total Phosphorous (mg/L PO4)	-	0.2
Nitrites (mg/L NO2)	<0.01	<0.01
Phenolic Compounds		Should not change taste of fish
Petroleum hydrocarbons		<p>Petroleum products should not be present in water in such quantities to:</p> <ul style="list-style-type: none"> - 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 NH3)	<0.005	<0.025
Total ammonium (mg/L NH4)	<0.04	<1
Residual chlorine (mg/L HOCl)	-	<0.005
Total zinc (mg/L)	-	<0.3
Soluble copper (mg/L)	-	<0.04

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
fecal streptococci (/100 mL)	100	-
Salmonellae (/L)	0	6-9
Physicochemical Parameters		
pH	6-9	-
Color	No abnormal change in color	No film visible on the surface of the water and no odor
Mineral oils (mg/L)	<0.3	-

Annex 4: Screening of TSEZ Per the Guidance Notes of Bank Policy for Program for Results Financing

Risk	Environmental and Social risk screening
<p>Associated or Likely Environmental and Social Effects</p>	<p><u>During construction</u>, of the infrastructure utilities, there would be temporary impacts on air quality (from earthworks and exhausts of construction machinery), noise and soil (from possible accidental releases of waste), in addition to the regular risks on Occupational Health and Safety (OHS). Such impacts, for developing infrastructure in a limited area, are relatively moderate and could be mitigated by common mitigation measures. Construction works for each facility will be progressing gradually as land plots are assigned to investors, therefore, construction impacts of individual facilities are expected to be less significant as the cumulative impacts in one time are relatively minor and could be mitigated by common mitigation measures.</p> <p><u>During operation</u>: The operation of TSEZ will involve impacts that could be more accurately assessed at this stage (such as impacts from service utilities) and others that could be less accurately assessed as it is related to the demand from investors, but the most likely sectors are indicated earlier. The main impacts during operation are:</p> <ul style="list-style-type: none"> - Impacts on air: mainly from fuel combustion by the power generators, in addition to point emission sources from facilities that might need to operate boilers, dryers, vacuum cleaners ... etc. It is expected that each individual point source will be relatively minor. The cumulative impacts of the whole sources need to be studied. - Impacts on water quality: Such impacts are likely to be minor, as it is unlikely that facilities, or infrastructure utilities, will have direct contact with seawater, unless in a very minor probability of having accidental releases leaches from soil to subsurface water. The indirect impact would be if the receiving Tripoli WWTP does not operate effectively, and this would need to be studied - Impacts on soil: There is a risk that accidental release of liquids could contaminate soil within TSEZ, however, this impact is likely to be moderate and could be mitigated by following sound storage facilities and handling practices. - Waste generation: Waste generation will be according to the type of facilities inside TSEZ. There would be generation of hazardous waste, however, if there is a plan for adequate handling of such substances the risk could be significantly reduced - OHS: This will depend on type of industries and risk minimizing measures - Community safety: Such risks would be minimum as the nearest residential area is relatively far, and that risk factors from the port operation could be considered of a higher significance.

	<ul style="list-style-type: none"> - Biodiversity: No direct impacts - Cultural heritage: No direct impacts <p><u>Social impacts and mitigation measures:</u> Social impacts during construction and operation are related to labor. During the construction phase, labor risks are related to the quality of contractual arrangements between workers and firms, and to the ability of workers to complain if these arrangements are either not in place or not properly implemented. This risk can be mitigated by requiring minimum standards in contractual arrangements between workers and firms and supervising that these arrangements are implemented. The minimum standards in these contractual arrangements should follow Lebanese legislation and the legislation put in place for the TSEZ.</p> <p>The SESA that is currently developed could significantly minimize and mitigate impacts from different TSEZ activities if adequate planning measures were put in place, and adequate system being adopted for environmental assessment and management of the hosted facilities.</p>
Environmental and Social Context	<p>As indicated earlier, the whole area is totally developed and no certain environmental sensitivities exists in the surroundings. The most sensitive receptors will be the residential areas, where the nearest is about 1 km away from TSEZ borders. The land is totally reclaimed and does not include any vegetation. The adjacent seabed is totally dredged and no (or very minor if any) benthic species exists. No impacts are expected on fisheries as no fisheries are located within the port area. It would not be expected that the site is used by migratory birds due to the baseline noise levels caused by the port activities, however, if so no direct impacts could be expected on birds. The nearby Abo Ali river receives considerable amounts of pollution from upstream urban areas so it is highly turbid and water quality in the downstream reaches is relatively low. Again, no TSEZ activity could affect riverine environment of Abo Ali River.</p>
Program Strategy and Sustainability	<p>The Program will have many socioeconomic benefits to the local community. The environmental sustainability of the area could be maintained if adequate measures were followed in planning the area and managing the expected environmental impacts. The TSEZ design could also benefit from renewable energy options (mainly solar energy) and up to date measures for energy conservation and minimizing the carbon footprint. Being located near the seashore, TSEZ will be relatively vulnerable to climate change and rise of sea level, but this is expected to be mitigated through seashore protection works already taken by the port authority. The establishment of TSEZ inside the port is unlikely to cause any restrictions on the decisions of future generations.</p>

<p>Institutional Complexity and Capacity</p>	<p>Given that TSEZ is recently established, it is expected that their capacity will be relatively weak and will need strong support in environmental management. The fact that the TSEZ could develop its own environmental and social (including labor) legislation and standards could be beneficial in maintaining the environmental quality of the area and the social conditions in the zone and surrounding areas. The environmental management, including the laws and standards, would be informed by the SESA that is currently being developed.</p>
<p>Reputational and Political Risks Context</p>	<p>There are no certain governance or corruption risks associated with the environmental aspects of the program. Developing TSEZ is not known to be controversial as it is located within a totally developed zone and will have many socio-economic benefits to residents of Tripoli. Political risks could be caused by improper environmental management of TSEZ that could lead to environmental impacts beyond the boundaries of TSEZ. A second political risk is related to the large number of foreign workers expected to work in the TSEZ. It is possible that the demographics of the work force could lead to certain political groups disagreeing with the project.</p>

Annex 5: Map of TSEZ and some photos from the site (source SEA Baseline Report finalized on February 2018)

Progress of TSEZ land reclamation between 2010 and 2016



Land use in and around TSEZ



Photo from TSEZ site looking south at the adjacent disposal site



Photos from Tripoli wastewater treatment plant

a. Primary treatment pond - Biological line



b. Aerobic biological treatment pond – Clarifiers



c. Anaerobic Digesters fo sludge treatment



d. Sludge incinerator



Annex 6: Public Consultation

Consultations to present the main findings of the ESSA were conducted on the 26th and 27th of February 2018. The objective was to present the key gaps and recommendations of each of the environmental and the social assessments. For the best representation of beneficiaries and stakeholders, the consultations were held over three sessions; two sessions were conducted in Beirut and included (i) government/implementing agencies, and (ii) national civil society representing environmental and social NGOs, and targeted beneficiaries. The third session took place in Tripoli to include key stakeholders representing civil society, international and local organizations and local governance. List of attendees is in Annex 6.

- Session 1: Government – Implementing agencies 26th of February 2018 – WBG offices Beirut.
- Session 2: Civil Society – 26th of February 2018 – WBG offices Beirut.
- Session 3: Civil Society and Government Representatives of North Lebanon – 27th February 2017 - Chamber of Commerce, Agriculture, and Industry; Tripoli and North Lebanon.

Prior to the consultations, the draft ESSA was shared with invited delegates giving them the time to review before the consultation meetings. During the consultations, the team presented the overall program, and the findings of the Economic and the Social assessments conducted. Key comments and team responses are summarized in the below matrix and divided among: (i) – overall program, (ii) – Environmental, (iii)- Social. In addition to consultation meetings the Draft ESSA was disclosed at the Bank External Website.

Many of the comments received during the consultations were related to the Program design and its monitoring during implementation. There were also many environmental and social comments related to different aspects of the system. The team took note of all the comments and took them into consideration in the Program documents.

Overall Program:

Comments	Session	How was it addressed
The team was advised to better address the Gender support in the program such as (i) the need to develop gender bylaws, and (ii) to also include support to women working in the TSEZ	Session 1	Point taken, in fact the team is working with international donors to design Gender support Technical Assistance at the TSEZ.
The new industrial revolution will wipe out many of the current jobs, is the program factoring this in, and why isn't it starting to design skills training in support of the future of job creation. Tripoli for instance lacks people with skills for managerial positions.	Session 3	The program is designed to build capacities for firms and people to improve the possibility of job opportunities in the Medium term.
Is Lebanon's Economic identity identified? Is there a clear strategy that is being designed looking particular at Lebanon as either an agriculture, and industrial or a services economy? There is a lot of talk on the china silk road, but it might not be useful, the weight of the investments is the west not the east	Session 3	The program under the two Value chains will support agriculture and agri-food processing, as well as others. The program is also working to support new industries in the TSEZ, the

		should attract international investments as well as bridge between people and jobs
It is true Tripoli has the highest rate of unemployment, but there should be the right infrastructure that attracts investments, will the money of the program be used to create jobs or to create more studies.	Session 3	The Program is designed to create jobs through its three components addressing both supply and demand sides
What about touristic sites, and why not look at culture and artisanal products and boost these for job creation or job preservations?	Session 3	The possibility of including the tourism sector will be considered depending on capacity and demand
Will the implementation of the program be easily accessible and transparent? This would be useful in the design of complementary projects.	Session 3	Main program documents will be publicly disclosed. There will be several mechanisms for citizen engagement during implementation. The dashboard suggestion will be considered
Would upgrading of Renee Mowawad Airport in Tripoli be considered by the Program?	Session 3	Feasibility studies will be conducted on CIP and 2 PPP projects will be supported. If the airport development will be qualified the Program will support it
From previous experiences, many projects implemented by CDR have failed, validators and project designers are usually outsiders, and do not necessarily understand the needs of the locals, how can we know for sure this will not happen with the TSEZ project?	Session 3	The WB team will provide implementation support and will work closely with the implementing agencies.

Environment:

Comments	Session	Response
On disclosure of studies, representative from MOE clarified that by law all studies have to be disclosed for public feedback, and that this law is being implemented (particularly EIAs). On mentioned gaps (from the assessment) in regards to the disclosure, representative from the MOE explained that studies like IEEs do not require public consultations, but must be publicly available	Session 1	Identified gaps are in relation to the requirements of the PforR and based on the national country systems. It is required by the PforR policy that EA instruments be disclosed to the public and this requirement has been highlighted in the ESSA

<p>In regard to the Natural habitats: there is a new hunting law but has not been implemented, however, the Ministry of Environment will be hiring 40 people to operate on field and already 1000 new hunting licenses were given.</p> <p>Program highlight on environmental tax: there are tax exemptions for green industries under law 444</p>	<p>Session 1</p>	<p>Noted. The effective of the new law will be followed up during implementation and relevance to Program interventions will be identified. Relevant implementing agencies will make beneficiaries in green business aware of the tax exemptions. This benefit has been highlighted in the ESSA</p>
<p>There is a need to identify types of industries at the TSEZ to assess risk, as the cumulative effect will be studied by the committee at MOE</p>	<p>Session 1</p>	<p>The SEA is currently working on this. The SEA will be presented to MoE for approval according to the requirements of Decree 8213/2012.</p>
<p>The team was asked if they had already considered having oil and gas companies at the TSEZ, and whether this will impact the environmental assessment</p>	<p>Session 1</p>	<p>Many Oil and gas industrial activities have significant impacts and, accordingly, should be excluded from the PforR. Screening criteria will be adopted for all suggested Program interventions.</p>
<p>Would a hazardous waste management facility be considered? a new law is being prepared for the on-shore hazardous waste covering storage, warehousing, and the treatment.</p>		<p>This will be an intervention of significant and unprecedented impacts (Lebanon has not had any hazardous waste facility prior to the PforR) so this excluded from the PforR.</p>
<p>What will be the greening landscape requirements in TSEZ</p>	<p>Session 2</p>	<p>This will be addressed in the TSEZ masterplan as informed by the SEA.</p>
<p>The TSEZ is close to a dumpsite. Who will invest?</p>	<p>Session 3</p>	<p>An SEA and the Master Plan will take the dumpsite location into consideration. However, it was also noted that the municipality of</p>

		Tripoli is working on finding a solution for the dumpsite. It is expected that the dumpsite will be locked within three years with the provision of an alternate location.
Recommendation: assessing the potential emissions from this program, and how it impacts Lebanon’s Nationally Determined Contribution (NDC) to climate change mitigation. One way to mitigate that is to integrate some of the recommendations by the Task Force on Climate-related Financial Disclosure, established by the Financial Stability Board	Received by email	The majority of Program interventions are small-scale with minimum GHG emissions. However, this will be considered during Program implementation for interventions of relatively high GHG footprint
Will any of the program components be impacted by potential climate impacts, and how to mitigate those impacts?	Received by email	The climate impacts, especially rising sea level, will be assessed for TSEZ. Also the Program includes, in the Value Chains component, providing climate resilient inputs to the agribusiness for mitigating climate impacts.
<p>In terms of job creation, special attention should be given to renewable energy and energy efficiency sectors, because:</p> <ul style="list-style-type: none"> -Renewable Energy SMEs are growing in number in Lebanon, and have a high coefficient of job creation. In the US renewable energy job are growing 12 times faster than the national average. The skills exist in the country, and is labor intensive (rigging rooftop PV, maintenance, etc.). -The world is undergoing a transition towards low-carbon development, and there is a need for Lebanon to get ready for this transition by investing in future technologies. One simple example is the slow decline of the combustion engine. Lebanon is far behind many developing countries in electrifying transport. Integrating Lebanon into the low-carbon transition is necessary for long-term economic stability. -Renewable energy is ideal for remote and marginalized areas development, where usually there is a lack of power supply. Akkar (North of Lebanon), for example, which is one of the most marginalized areas of Lebanon, is ideal for wind energy development. The Cabinet recently passed a decision for wind energy development in Akkar, which the WB can assist in taking it forward. Renewable energy has proven to be effective in telecommunication projects, especially in remote areas. 	Received by email	<p>Under the PPP component, feasibility studies will be conducted on CIP and 2 PPP projects will be supported, and if renewable energy developments will be qualified the Program will support it.</p> <p>TSEZ masterplan and SEA will work on maximizing the use of solar energy for the facilities within TSEZ.</p>

Social

Comments	Session	Response
Is the team taking into consideration the negative impact of supporting Syrians; creating the conflict between Lebanese and non-Lebanese of the same beneficiary groups	Session 1	The program aims to create jobs for the Lebanese community but also for refugees in accordance with Lebanese Laws and Regulations, in a way that does not cause disparities between the two groups. Eg: under ALMP programs (Results Area 3), training will be provided to both but only Lebanese can benefit from a bigger package of services, including the wage subsidy. Syrians will only be eligible to receive vocational training services in accordance with Lebanese Laws and Regulations
Refugees/Syrians in Lebanon already causing great pressures on the local communities were these taken into consideration in the assessment	Session 2	The team clarified that the program is actually trying to help mitigate this impact, as the program is meant to benefit both.
It was pointed out that the Government of Lebanon does not use the word refugees but displaced.	Session 2	Noted. The World Bank is using internationally recognized language.
The distribution of the beneficiaries of the program is interesting especially the focus on the marginalized regions in Lebanon as they require the strongest support, but how will the program ensure that these regions are receiving the benefits suggested.	Session 1	The team explained that the Matching Grant and the Value Chain program is targeting the lagging regions and the firms operating in them.

List of Attendees

<i>Government - Feb 26</i>		
Name	Position	Organization
Zeina El Khoury	Private Sector Specialist	WB
Johnny Matta	Sr. Enterprise Policy Officer	UNDP - Ministry of Economy
Mohamad Abou Haidar	Expert	UNDP - DG Office - Ministry of Economy
Eng. George Fadel	IT Manager	National Employment Office
Natalia Robalino	Senior Counsel	WB
Mohammad Kandeel	Sr. Environmental Specialist	WB
Peter Mousley	Program Leader	WB
Diala Chaar	Project Manager	HCP
Haneen Sayed	Program Leader	WB
Ghassan Awar	Inspector Physician	OSM - Ministry of Labor
Joumana Haymour	Ministry of Labor	Ministry of Labor
Sami Feghali	Head of National head use Planning	CDR
Bassam Kassir	Project Manager - TSEZ	Khatib & Alami
Randa Yassir	Advisor to the Minister	Minister of Women
Lama Mghames	Project Manager - PCB Project	Ministry of Environment
Rania Shaar	Chief Accountant -Public Debt Directorate	Ministry of Finance
Samir Nahas	Economist	TSEZ
Abir Safadi	Inspector	Higher Council of Customs
<i>CSOs - Feb 26</i>		
Hiam Kreidieh	Treasurer	Lebanese Environment Forum (LEF)
Yussef ElHajj	Project Manager	Khatib & Alami
Diane Nauffal	Institutional Research & Assessment	LAU
Rima El Hussein	Lawyer/Conflict Resolution Expert - Director of Al-Mithaq, Baalbeck	LAU
Siham Rizkallah	Maître de Conference	Faculté de Sciences Politiques - USJ
Natalia Robalino	Senior Counsel	WB
Mohammad Kandeel	Sr. Environmental Specialist	WB
Peter Mousley	Program Leader	WB
Samir Nahas	Economist	TSEZ
Walid Marroush	Associate Professor of Economics	LAU
Chritiane Saba	Local Development Consultant & Employment Solutions	René Moawad Foundation
<i>Tripoli - Feb 27</i>		
Eng. Ahmad Kamareddine		Municipality of Tripoli

List of Attendees

Dr. Ahmad Tamer		Tripoli Port
Salima Al Ayi		Injaz
Najwa Al Sahmarani		Rawad Al Aamal
Sarah Al Sharif		Rawad Al Tanmia
Sally Khalaf		Mercycorps
Alain Chatiri		UNDP
Omar Halwa		ملتقى الجمعيات الاهلية
Zeid Hamza		جمعية ملتقى الخير والتنمية
Rabih Mina		جمعية بناء الانسان
Nada Chahal		Economic and Social Development
Mohammad Dib		جمعية بيت الاداب والعلوم
Abdel Rahman Kantar		Association Mobdeoun

ESSA Stakeholder Consultations 26-27 February 2018: Pictures from the Events



Consultations Session 1 in Beirut with government stakeholders, 26 February, 2018



Consultations Session 2 in Beirut with civil society organizations, 26 February 2018



Consultations Session 3



Consultations Session 3

Consultations Session 3 in Tripoli at the Chamber of Commerce, Industry and Agriculture involving businesses, civil society organizations and municipal and other government officials, 27 February 2018.