

The LEBANESE Republic

Emergency Crisis and Covid-19 Response Social Safety Net Project (P173367)

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

June 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Lebanese Republic (hereinafter the **Borrower**) will implement the Lebanon Emergency Crisis Response Social Safety Net Project (P173367) (the **Project**), with the involvement of the Presidency of the Council of Ministers (PCM), the Ministry of Social Affairs (MoSA) and the Ministry of Education and Higher Education (MEHE). The International Bank for Reconstruction and Development (hereinafter the **Bank**) has agreed to provide financing for the Project.
2. The Borrower will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Borrower is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
4. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the Borrower as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. As agreed by the Bank and the Borrower, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Borrower will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the Borrower. The Borrower will promptly disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Borrower shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, risks to the health and safety of populations (gender-based violence, sexual exploitation abuse and harassment, etc.), exclusion of some vulnerable and disadvantaged groups, and contextual risks.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>The Borrower shall prepare and submit to the Bank, through the Project Management Unit (PMU), regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including, but not limited to, status of implementation of the ESCP, status of preparation and implementation of Environmental and Social (E&S) documents required under the ESCP, stakeholder engagement activities, reports and the functioning of the grievance mechanisms and tools referred to in section 1.3 below.</p>	<p><i>Starting from the Effective Date (Expected September 2020), every six-months during the Project's implementation in conjunction with the Project's progress reports.</i></p>	CMU
B	<p>INCIDENTS AND ACCIDENTS</p> <p>The Borrower shall promptly notify the Bank of any incident or accident related to the Project or affecting the Project that has, or is likely to have, a significant adverse effect on the environment, affected communities, workers, including risks based on environmental and social assessment. As an indication: any accident related to the Project or any allegation of gender-based violence in relation to the Project.</p> <p>Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p><i>Immediately, and no later than 48 hours after such incidents or accidents, report to the Bank's Project Team Leader.</i></p> <p>Prepare an incident/ accident report within 10 business days as per the Bank's request.</p>	CMU
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>The contracted firms (GRM support, communications firm, etc.) are required to provide monthly monitoring reports to the Borrower. These reports would be submitted to the Bank by the Borrower upon request.</p>	<p><i>Monthly reports</i></p>	CMU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks and impacts of the Project, including (1) the contracting of a firm to establish a robust Grievance Redress Mechanism (GRM), (2) a pro-active communications outreach program, (3) social workers with relevant qualifications and incentivized to do the case management works, (4) a Social specialist to follow up and monitor the risks and mitigations as assessed in the SIA, (5) considering hiring a Gender-Based Violence (GBV) specialist to prepare a GBV Action Plan and monitor and mitigate associated risks accordingly, all with relevant qualification and acceptable to the Bank.</p>	<p><i>An organizational structure including the social specialist will be established by the Effective Date (Expected September 2020).</i></p> <p><i>The organizational structure, including the specialists, will be maintained throughout Project implementation.</i></p>	CMU
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Update, disclose, adopt and implement the Social Impact Assessment (SIA) actions and measures for the Project in accordance with ESS1 in a manner acceptable to the Bank.</p> <p>Monitor implementation of the measures in the SIA and update mitigation measures based on changing conditions.</p> <p>The hired Social specialist will ensure regular monitoring, mitigation, documentation and reporting of social risks.</p> <p>Prepare, disclose and adopt and implement the Environmental and Social Management Framework (ESMF) in accordance to the CERC component of this project.</p>	<p><i>SIA: One month after the Effective Date (Expected September 2020) and before the carrying out of the relevant Project activities</i></p> <p><i>Monitoring and updating of SIA throughout project implementation.</i></p> <p><i>ESMF to be prepared one month after the Effective date (Expected September 2020)</i></p>	CMU (Social Specialist)
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>The Borrower shall incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications in the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. This applies also to the firms recruited to provide GRM support and communications.</p>	<p><i>Prior to the preparation of procurement documents.</i></p> <p><i>Supervise contractors throughout Project implementation.</i></p>	CMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities that may cause long term, permanent and/or irreversible adverse impacts (e.g. loss of major natural habitat). • Activities that may have significant adverse social impacts and may give rise to significant social conflict. • Activities that may affect lands or other vulnerable minorities. • Activities, including new constructions or expansions, that may involve, physical relocation or adverse impacts on cultural heritage. • All the other excluded activities set out in the SIA of the Project. 	<p><i>During the assessment process conducted under action 1.2.a. above and during implementation;</i></p>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), establishing out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors.</p> <p>The Recipient shall prepare, disclose, adopt and implement a LMP incorporating the relevant requirements of ESS2, in a manner acceptable to the Association, that will address the terms and conditions of employment, non-discrimination and equal opportunity for employment, worker’s organizations, restrictions on child and forced labor, occupational health and safety (OHS) measures related to COVID-19 as per the national health requirements in response to the epidemy.</p>	<p><i>Prepare LMP prior to the Effective Date (Expected September 2020).</i></p> <p><i>Implement LMP throughout Project implementation</i></p>	CMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The Contracted workers' contracts should also be in line with the requirements of ESS2.</p>	<p><i>Grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation.</i></p>	CMU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	Currently not relevant to the project		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.3	<p>GBV AND SEA RISKS:</p> <p>Prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan), to assess and manage the risks of sexual exploitation and abuse/sexual harassment (SEA/SH).</p>	<p><i>Submit the GBV Action Plan for the Bank's approval by the Effective Date (Expected September 2020).</i></p> <p><i>Once approved, the GBV Action Plan is implemented throughout Project implementation</i></p>	CMU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Currently not relevant to the Project		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Currently not relevant to the Project		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Currently not relevant to the Project		
ESS 8: CULTURAL HERITAGE			
	Currently not relevant to the Project		
ESS 9: FINANCIAL INTERMEDIARIES			
	Currently not relevant to the Project		

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Update, disclose and implement the Stakeholder Engagement Plan (SEP) consistent with ESS10 in a manner acceptable to the Bank. The Borrower will ensure the implementation of the Stakeholder Engagement Plan (SEP) which will be amended and updated as required during the Project implementation following inclusive stakeholder consultations.</p>	<p><i>One month after the Effective Date (Expected September 2020) and implemented throughout project implementation and with Regular reporting</i></p>	<p>CMU (Social Specialist in coordination with communications firm and MoSA)</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP. Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Bank.</p>	<p><i>The Project Grievance Mechanism shall be operational and adequately resourced by the Effective Date (Expected September 2020), as part of the SEP and of the LMP (for project workers), and maintained throughout Project Implementation</i></p>	<p>CMU. The GRM will be managed and monitored by a Third Party, under a firm contract.</p>
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training may be required for PIU staff, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Specific aspects of social assessment, including GBV SEA/SH risks, impacts and mitigation measures • OHS measures related to COVID-19 as per the national health requirements • Grievance redress mechanism • GBV and SEA/SH 		