

REPUBLIC OF LEBANON

**Ministry of Public Works and Transport,
Council for Development and Reconstruction
Lebanon Emergency Assistance Project
(P509428)**

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Draft for Appraisal

February 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Lebanese Republic (the Borrower) will implement the Lebanon Emergency Assistance Project (P509428) (the Project), with the involvement of the Ministry of Public Works and Transport, Council for Development and Reconstruction, as set out in the Loan Financing Agreement (the Agreement). The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing for the Project, as set out in Agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower's Representative specified in the Agreement or a designated official of the Ministry of Public Works and Transport, Council for Development and Reconstruction. The Borrower shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT¹			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Management Unit (PMU) with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including one occupational health and safety specialist, an environmental specialist, and a social specialist.</p>	<p>Establish a PMU and hire or appoint one occupational health and safety specialist, an environmental specialist, and a social specialist, no later than 30 days after the Project Effective Date, and thereafter maintain the PMU and these positions throughout Project implementation.</p>	CDR
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement following capacity building measures:</p> <ul style="list-style-type: none"> • Training for the PMU staff on stakeholder engagement and grievance mechanism, environmental and social management plan including occupational health and safety, community health and safety and waste management, SEA/SH • Training for the PMU, contractors and supervision consultants on occupational health and safety, and community health and safety issues associated with rubble management • Training for supervision consultant and contractors on stakeholder engagement and grievance mechanism, environmental and social management plan including occupational health and safety, community health and safety and waste management, SEA/SH • Training for communities on grievance mechanism, community health and safety, and SEA/SH 	<p>No later than 60 days after the effective Date</p> <p>Prior to commencing works</p> <p>Prior to commencing works</p> <p>Prior to commencing works</p>	CDR PMU
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. 	<p>Submit quarterly reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 15 days after the end of each reporting period.</p>	<p>CDR PMU</p>
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.</p>	<p>Submit the monthly reports to the Bank as annexes to the reports to be submitted under action C above.</p>	<p>CDR PMU</p>
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Bank no later than 20 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	<p>CDR PMU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <ol style="list-style-type: none"> Component 1: Prepare Environmental and Social Management Plan (ESMP) for activities under the Components 1a of the Project, in accordance with the Terms of Reference acceptable to the Bank, and in accordance with the relevant ESS, for rubble management. The ESMP will identify any E&S risks associated with rubble management; and will propose E&S mitigation measures to address identified risks and impacts. The ESMP will be disclosed. Components 1.b and 2.a: Prepare, disclose, consult upon and implement site specific Environmental and Social Impact Assessments (ESIA), and corresponding Environmental and Social Management Plan (ESMPs) or standalone ESMPs depending on the nature and scale of the works, in agreement with the Bank and consistent with the relevant ESSs. Components 1.b and 2.a.: Oblige Contractors to prepare and implement the site-specific Environmental and Social Management Plan (C-ESMP), consistent with the relevant ESSs. Component 3b: Prepare, disclose, consult upon and implement site specific Environmental and Social Impact Assessments (ESIA), and corresponding Environmental and Social Management Plan (ESMPs) or standalone ESMPs depending on the nature and scale of the works, in agreement with the Bank and consistent with the relevant ESSs. 	<p>1. Prepare ESMPs, acceptable to the Bank, prior to commencing works and thereafter implement ESMP throughout Project implementation.</p> <p>2. Prepare ESIA and ESMPs, acceptable to the Bank, prior to commencing works and thereafter implement ESIA and ESMP throughout Project implementation.</p> <p>3. Prepare ESMP and incorporate the ESMP as part of the respective bidding documents for the respective subprojects prior to the carrying out of subprojects that require the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation.</p> <p>4. Prepare ESIA and ESMPs, acceptable to the Bank, prior to commencing works and thereafter implement ESIA and ESMP throughout Project implementation.</p>
1.2	<p>MANAGEMENT OF CONTRACTORS</p>	<p>As part of the preparation of procurement documents and respective contracts.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Incorporate the relevant aspects of the ESCP, including, inter alia, ESMP, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.	Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request.	
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project] in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project implementation.	CDR PMU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors and subcontractors. Ensure that Project workers are informed of and have access to these procedures.	Prepare the LMP no later than 30 days after the effective Date and thereafter implement the LMP throughout Project implementation.	CDR
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the ESMP. Acquire official clearance from the Lebanese authorities on the absence of unexploded ordinance (UXOs) and mortal remains, and include such clearance in the site specific instrument as per Action 1.1.	Prepare the OHS Management Plan prior to start of work and thereafter implement the plan throughout Project implementation. Before commencement of rubble removal activities	CDR PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	CDR PMU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESIA's and ESMPs prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Prepare the WMP prior to bidding stage for civil works and thereafter implement the WMP throughout Project implementation.	CDR PMU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMP.	CDR PMU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMP.	CDR PMU
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, response to emergency situations, exposure to waste, exposure to UXOs and include mitigation measures in the ESMPs.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	CDR PMU
4.3	<p>SEA AND SH RISKS</p> <p>Prepare and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH.</p>	Prepare the SEA/SH Action Plan no later than 90 days after the Effective Date, and thereafter implement the SEA/SH Action Plan throughout Project implementation.	CDR PMU
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities as set out in the ESMP.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	CDR PMU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	Not relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Incorporate biodiversity conservation and prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMPs.	CDR PMU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not relevant		
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS Describe and implement the chance finds procedures, as part of the ESAs and ESMPs of the Project.	Describe the chance find procedures in the ESMP and implement the procedures throughout Project implementation.	CDR PMU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	No relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Finalize, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Finalize and adopt the SEP no later than 30 days after the Effective Date of the Project, and thereafter implement the SEP throughout Project implementation.	CDR PMU
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Establish the grievance mechanism no later than 60 days after the Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.]	CDR PMU
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness:			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> ○ Hiring/appointing a qualified environmental, social and OHS specialist as indicated in Action A ○ Training for the PMU staff on stakeholder engagement and grievance mechanism, environmental and social management plan including occupational health and safety, community health and safety and waste management, SEA/SH as indicated in Action B ○ Preparation of site specific ESIA and ESMP as per Action 1.1.2 ○ Preparation of the LMP as per Action in 2.1 ○ Operationalization of the workers' GM as per Action 2.3 ○ Operationalization of project GM as per Action 10.2. 		