

REPUBLIC OF LEBANON
Ministry of Finance (MOF)

Lebanon
Fiscal Management Project
(P181155)

Draft
ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

November 7, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
Lebanon Fiscal Management Project (P181155)

1. The Ministry of Finance (MOF) (Recipient) will implement the Lebanon Fiscal Management Project (P181155) (the Project) financed by the World Bank, as set out in the Loan Agreements. The World Bank has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Recipient 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 Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank. As agreed by the Bank and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Government of Lebanon through the Ministry of Finance (MOF) as the implementing agency, and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the [Minister of Finance](#). The MOF shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism, including but not limited to grievance logs from stakeholders including project staff/workers and communities, overall E&S performance of the project, compliance to ESSs during implementation of project activities, project-related accidents and implementation plans for the project activities in the subsequent quarter.</p>	<p>Starting from the Effective Date, reporting every quarter throughout the Project implementation. Reports to be sent within 30 days after the reporting period ends.</p>	<p>MOF: PCU Environmental & Social Specialist</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank of any incident or accident related 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 but not limited to:</p> <ul style="list-style-type: none"> • Occupational Health and Safety Issues. • GBV, exploitation, discrimination, unresolved grievances and Sexual exploitation and abuse (SEA) or sexual harassment (SH). • Civil unrest, criminal and political attacks at worksites. <p>Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, as per the Bank request, in addition to the initial notification, prepare a report on the incident/accident and propose specific time-bound actions and measures to prevent its recurrence.</p>	<p>Report any incident or accident to the Bank within 48 hours after becoming aware of the occurrence of the incident or accident.</p> <p>A report would be provided within 10 days of the initial notification to the Bank, as requested.</p> <p>File a closure report within 30 days or an agreed time frame, as per the World Bank request.</p> <p>Notification/reporting requirements shall be in place throughout the Project implementation.</p>	<p>MOF: PCU Environmental & Social Specialist.</p>
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts to the MOF, who will in turn submit them to the Bank upon request.</p>	<p>Prepared monthly by contractors submitted to the Bank upon request.</p>	<p>MOF: PCU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain, throughout the Project implementation, an organizational structure for project, including a Project Coordination Unit (PCU), an environmental and social risks and impacts management function with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts of the Project activities with mandate, resources, and terms of reference satisfactory to the Bank.</p> <p>The PCU needs to appoint an Environmental and Social Specialist, who will be responsible for the day-to-day implementation of the outcomes of the E&S studies and instruments. The E&S Specialist will assume overall responsibility for coordinating the management of the environmental and social aspects of the project interventions at the respective sites.</p>	<p>The organizational structure will be finalized before commencement of project activities. This structure shall be maintained throughout Project implementation</p> <p>The Environmental and Social (E&S) specialist shall be appointed before the start of project activities and shall be maintained throughout project implementation.</p>	<p>MOF: PCU Environmental & Social Specialist</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Update, disclose, consult upon, adopt, and implement the following instruments, consistent with the requirements of the relevant ESSs and in a manner acceptable to the Bank:</p> <ul style="list-style-type: none"> • Stakeholder Engagement Plan (SEP) • Labor Management Procedures (LMP) • Waste Management Plan (WMP) • Occupational Health and Safety (OHS) Plan 	<p>The preliminary SEP will be cleared and disclosed prior to appraisal. The LMP, WMP and OHS Plan will be finalized, cleared and disclosed, during implementation and before commencement of project activities. The instruments will be implemented throughout project implementation, and will be updated as needed to ensure consistency with the requirements of relevant ESSs</p>	<p>MOF: PCU Environmental & Social Specialist</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective</p>	<p>Prior to the Tendering /Contracting Phase and supervision during Project implementation</p>	<p>MOF: PCU Environmental & Social Specialist.</p>

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	contracts.		
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter implementing agencies shall ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	MOF: PCU
1.5	<p>CONTINGENT RESPONSE FINANCING</p> <p>a) Ensure that the Contingent Emergency Response Component Manual (CERCM) as specified in the legal agreement includes a description of the ESHS assessment and management for the implementation of component 4, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&S) instruments which may be required for activities under component 4 of the Project, in accordance with the CERC Manual and, if applicable, CERC-ESMF or CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The adoption of the CERC manual in form and substance acceptable to the Bank is a withdrawal condition under Section [F] of Schedule 2 of the loan agreement for the Project. (to be completed once the draft legal agreements are prepared)</p> <p>b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	MOF: PCU Environmental & Social Specialist
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt and implement the Labor Management Procedures (LMP) for the Project that have been developed for the Project as a standalone document, 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 Sexual Exploitation and Abuse/SEA and Sexual Harassment/SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	<p>Finalize and submit to the bank for clearance, and disclose the LMP before commencement of project activities.</p> <p>Implement and update the LMP throughout project implementation</p>	MOF: PCU Environmental & Social Specialist
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) PLAN</p> <p>Adopt and implement an Occupational Health and Safety Plan (OHS) to include mitigation measures and actions to manage OHS risks and impacts, including fire and life</p>	Finalize and submit to the bank for clearance, and disclose the OHS Plan before commencement of project	MoF: PCU Environmental and Social Specialist

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>safety measures, and following the World Bank EHS guidelines.</p> <p>Contractors that undertake minor civil works and removal/installation of IT equipment shall be required to abide by the OHS Plan</p>	<p>activities Implement and update the OHS Plan throughout project implementation</p>	
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a Grievance Mechanism (GM) for all stakeholders including Project staff/workers, and Contractor/Supervising firms as described in the LMP and consistent with ESS2. The GM shall have the following characteristics:</p> <ul style="list-style-type: none"> ▪ Proportionate to the nature and scale of the project and its risks and impacts. ▪ Address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language that they understand, and without any retribution. ▪ Operate in an independent and objective manner and implement the principles of confidentiality and anonymity as warranted (in particular when the grievance concerns sexual exploitation and abuse and sexual harassment). ▪ Roles and responsibilities shall be assigned to competent staff who will receive adequate training. 	<p>The GM, as part of the LMP, shall be established before commencement of project activities and shall be implemented, monitored, updated and maintained throughout project implementation.</p>	<p>MOF PCU Environmental & Social Specialist</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement a Waste Management Plan (WMP) to manage hazardous and non-hazardous wastes associated with minor civil works for the installation and upgrading of the IT hardware and technology consistent with ESS3.</p> <p>Contractors that undertake minor civil works and removal/installation of IT equipment shall be required to abide by the WMP.</p>	<p>Finalize and submit to the bank for clearance, and disclose the WMP before commencement of project activities.</p> <p>Implement and update the WMP throughout project implementation</p>	<p>MOF: PCU Environmental & Social Specialist</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Conduct energy audits and integrate energy efficiency in the design and selection of the IT hardware and technology to manage the expected increase in energy demand by the implementing agencies</p>	<p>Before the commencement of procurement of IT equipment and solar panels for electricity generation. Those requirements shall be implemented, maintained, and managed throughout Project implementation.</p>	<p>MOF: PCU Environmental & Social Specialist.</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Prepare, adopt, and implement as part of the OHS Plan, measures to manage specific</p>	<p>Prior to commencement of infrastructure and civil works for the IT</p>	<p>MOF: PCU Environmental & Social</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	risks and impacts to the community arising from minor civil works associated with the installation and upgrading of IT equipment in a manner acceptable to the Bank.	hardware and technology upgrade, and to the installation and operation of the solar panels for electricity generation. Shall be maintained and managed throughout Project implementation	Specialist.
4.3	SEXUAL EXPLOITATION AND ABUSE AND SEXUAL HARASSMENT (SEA AND SH) RISKS Prepare, adopt, and implement as part of the LMP, mitigation measures and actions to manage the risks of gender-based violence (GBV) and sexual exploitation and abuse and sexual harassment (SEA/SH) such as awareness raising, signing of codes of conduct by all project workers as identified in ESS2 and a GM sensitive to SEA/SH	Prepare, submit to the bank for clearance, and disclose the LMP before commencement of project activities (including the GBV and the SEA/SH mitigation measures and actions) Implement and update the LMP plan (including the GBV and the SEA/SH mitigation measures and actions) throughout project implementation	MOF: PCU Environmental & Social Specialist.
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY			
Currently not applicable			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Currently not applicable			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Currently not applicable			
ESS 8: CULTURAL HERITAGE			
Currently not applicable			
ESS 9: FINANCIAL INTERMEDIARIES			
Currently not applicable			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION 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. The MOF shall ensure that the SEP is amended and	The preliminary SEP will be disclosed prior to project appraisal. The SEP will be updated and disclosed to reflect feedback from additional consultations before commencement of project activities.	MOF: PCU Environmental & Social Specialist.

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	updated as required during the Project implementation following inclusive stakeholder consultations.	The SEP will be implemented throughout Project implementation.	
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>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.</p> <p>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.</p>	A GM shall be established and operationalized no later than the Loan Effectiveness Date and shall be maintained throughout the Project implementation period as described in the SEP.	MOF: PCU Environmental & Social Specialist.
CAPACITY SUPPORT			
CS1	<p>Training and information dissemination to the public and community groups as well as local authorities, and others as identified in the SEP on the following as relevant to them:</p> <ul style="list-style-type: none"> Stakeholder mapping and engagement Specific aspects of environmental and social assessment including GBV SEA/SH risks, impacts and mitigation measures that require feedback from the public and local authorities and for their own awareness so that community health and safety can be improved Grievance redress mechanism Training on occupational health and safety including emergency prevention and preparedness and response arrangements to emergency situations. 	Following SEP disclosure and as soon as relevant instruments are completed	MOF PCU Environmental & Social Specialist.
CS2	<p>Training shall be conducted for project staff/workers and contractors, while maintaining training records on the following:</p> <ul style="list-style-type: none"> Occupational health and safety including emergency prevention and preparedness and response arrangements to emergency situations. Training on implementation of environmental and social due diligence documents (e.g., OHS, community health and safety, stakeholder engagement, grievance, codes of conduct, etc.) to all staff working with contractors and sub-contractors that are responsible for project’s environment and social issues LMP Waste Management Plan GBV AND SEA/SH Grievance mechanism 	Prior to commencing works and throughout project implementation.	MOF PCU Environmental & Social Specialist.