

LEBANESE REPUBLIC

Ministry of Finance

Fiscal Management Project

(P181155)

ENVIRONMENTAL AND SOCIAL

COMMITMENT PLAN (ESCP)

Additional Financing

29 June 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Lebanese Republic (Borrower) is implementing the Lebanon Fiscal Management Project (P181155) (the Project), as set out in the Original Loan Agreement, the LFF Grant Agreement and Additional Financing Agreement (the Agreements). The International Bank for Reconstruction and Development (the Bank), acting as the administrator of LFF, has agreed to provide the original financing and additional financing for the Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Original Project dated November 7, 2023, and is updated on June 11, 2026 for the purpose of the additional financing and shall apply to the original and the additional financing for the Project referred to above.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
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 Agreements, 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 Agreements. 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 SUPPORT		
A	<p>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 within 2 months of the Effective Date and shall be maintained throughout project implementation. In the interim, the E&S focal point at the MOF will ensure follow up on the implementation and monitoring of E&S requirements.</p>
MOF: PCU Environmental & Social Specialist		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <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. <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 in the 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 subcontractors that are responsible for project's environment and social issues • LMP • Waste Management Plan • GBV AND SEA/SH • Grievance mechanism 	<p>Following SEP disclosure and as soon as relevant instruments are completed</p> <p>Prior to commencing works and throughout project implementation.</p>	<p>MOF: PCU Environmental & Social Specialist.</p>
MONITORING AND REPORTING			
C	<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>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	<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>	Prepared monthly by contractors submitted to the Bank upon request.	MOF: PCU
E	<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 details 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 will 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>	MOF: PCU Environmental & Social Specialist.
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</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 	The preliminary SEP was cleared and disclosed on November 07, 2023. The SEP, LMP, WMP and OHS Plan will be updated and disclosed within three months after the Effective Date 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	MOF: PCU Environmental & Social Specialist

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>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 contracts.</p>	Prior to the Tendering /Contracting Phase and supervision during Project implementation.	MOF:PCU Environmental & Social Specialist.
1.3	<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
1.4	<p>CONTINGENT EMERGENCY 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 5, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&S) instruments which may be required for activities under component 5 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.</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			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>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</p>	Finalize and submit to the bank for clearance the LMP within 3 months of the Effective Date.	MOF:PCU Environmental & Social Specialist
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT 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 safety measures, and following the World Bank EHS guidelines. Contractors that undertake minor civil works and removal/installation of IT equipment shall be required to abide by the OHS Plan</p>	Finalize and submit to the bank for clearance, and disclose the OHS Plan within 3 months of the Effective Date and update the OHS Plan throughout project implementation.	MoF: PCU Environmental & Social Specialist
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. 	The GM, as part of the LMP, shall be established by one month of the Effective Date and prior to the hiring of any project workers, and, thereafter, shall maintained throughout project implementation.	MOF PCU Environmental & Social Specialist
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement a Waste Management Plan (WMP) to manage hazardous and nonhazardous 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>	Finalize and submit to the Bank for clearance, and disclose the WMP within 3 months of the Effective Date and prior to the carrying out of any relevant activities under the Project. Implement and update the WMP throughout project implementation	MOF: PCU Environmental & Social Specialist
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>	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.	MOF: PCU Environmental & Social Specialist.
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Prepare, adopt, and implement as part of the OHS Plan, measures to manage specific 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.</p>	Prior to commencement of infrastructure and civil works for the IT 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	MOF: PCU Environmental & Social Specialist.
4.2	<p>SEA AND SH RISKS</p> <p>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</p>	Prepare, submit to the bank for clearance, and disclose the LMP within 3 months of the Effective Date (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 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>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 updated as required during the Project implementation following inclusive stakeholder consultations.</p>	<p>The preliminary SEP was disclosed on November 07, 2023. The SEP will be updated and disclosed to reflect feedback from additional consultations before commencement of project activities. The SEP will be implemented throughout Project implementation.</p>	<p>MOF: PCU Environmental & Social Specialist.</p>
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. Set up an interim mechanism for receiving complaints in the Ministry of Finance pending the effectiveness of the GM.</p>	<p>A GM shall be established and operationalized no later than one month following the Effective Date and shall be maintained throughout the Project implementation period as described in the SEP. For the first 30 days of project implementation an email will be created to receive complaint and a PCU worker shall be designated to monitor it and report on it.</p> <p>The interim mechanism for receiving complaints must be put in place before starting of any civil works</p>	<p>MOF: PCU Environmental & Social Specialist.</p>

INDICATORS FOR IMPLEMENTATION READINESS

The following actions are indicators for implementation readiness:

- 1- The appointment of the Environmental and Social (E&S) specialist within 2 months of the Effective Date (as per Action A)
- 2- Within three months after the Effective Date and before commencement of project activities, update, disclose, consult upon, adopt, and implement the following instruments (as per Action 1.1):
 - Stakeholder Engagement Plan (SEP) (and as per Action 10.1)
 - Labor Management Procedures (LMP) (and as per Actions 2.1 and 4.2)
 - Waste Management Plan (WMP) (and as per Action 3.1)
 - Occupational Health and Safety (OHS) Plan.(and as per Action 2.2)
- 3- Finalize and submit to the bank for clearance the LMP within 3 months of the Effective Date as per Action 2.1
- 4- Establish the workers' GM, as part of the LMP, by one month of the Effective Date and prior to the hiring of any project workers (as per Action 2.3)
- 5- Establish and operationalize Project GM no later than one month following the Effective Date (as per Action 10.2)