

The Republic of Lebanon

[Strengthening Lebanon's Covid-19 Response - \(P178587\)](#)

Appraisal version ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

[10 May 2022]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Lebanon (GoL) (hereinafter the [Borrower]) shall implement the [Strengthening Lebanon's Covid-19 Response - \(P178587\)](#) Project (the **Project**), through the Ministry of Public Health (MoPH) as set out in the Loan Agreement. The *International Bank for Reconstruction and Development (hereinafter the Bank)* has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Borrower through the Ministry of Public Health 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 to be carried out or caused to be carried out by the Borrower through the Ministry of Public Health, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESCP and the ESSs, all 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.
4. As agreed by the Bank and the Borrower through the Ministry of Public Health, 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 the assessment of Project performance conducted under the ESCP itself. In such circumstances, the Borrower through the Ministry of Public Health *or contractor/ delegate(s)* shall update the ESCP to reflect the agreed-upon changes. Agreement on changes to the ESCP shall be documented through an exchange of letters signed between the Bank and the Borrower through the Ministry of Public Health *or contractor/ delegate(s)*. The Borrower through the Ministry of Public Health *or contractor/ delegate(s)* shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING: Prepare and submit to the Bank regular monitoring reports on the 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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanisms.	Starting from the Effective Date, quarterly reports shall be submitted no later than 45 days after the end of each reporting period, throughout Project implementation.	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH
B	INCIDENTS AND ACCIDENTS: 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, inter alia, any COVID outbreak in the Project area. 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.	Notify the Bank within 48 hours after learning of the incident or accident. A report would be provided within a timeframe acceptable to the Bank, as requested (no more than 10 working days after incident notification). This notification/reporting system shall remain in place throughout Project implementation	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: The Ministry of Public Health (MoPH) shall establish and maintain Project Management Unit (PMU) with qualified staff and resources to support the management of ESHS risks and impacts of the Project.	The Ministry of Public Health has appointed an Environmental and Social Safeguards focal point at the MoPH and will be maintained through the implementation phase of the Project. In addition, an Environmental and Social Safeguards specialist and GM officer will also be recruited prior to commencement of project activities. This activity comprises of publishing a Request for Expression of Interest (REOI), shortlisting candidates, evaluating candidate profiles, awarding the contract to the candidate with comparable qualifications that fully address the requirements specified in the ToR.	MoPH Project Management Unit (PMU) Project Manager in collaboration with relevant department at the MOPH

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<p>Technical Auditor A Technical Auditor (TA) will be contracted to verify the GoL's compliance of the vaccination deployment with the NDVP, WHO standards, and WB requirements reflected in the legal agreements, Environmental and Social safeguards, and Project Operation Manual (POM). The TA will be hired to monitor the deployment of Bank-financed vaccines under the proposed operation.</p>	<p>The Ministry of Public Health (MoPH) shall recruit a TA no later than three months after project effectiveness. The TA will be expected to submit monthly reports on E&S and vaccination deployment as of contract effectiveness and no later than 15 days after the end of each reporting period, throughout Project implementation.</p>	<p>MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with the <i>Environmental and Social Management Framework (ESMF)</i> to be prepared, disclosed, consulted and adopted for the Project, the ESSs, the Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines.</p> <p>b. Prepare, disclose, consult, adopt, maintain and implement any environmental and social management plans (e.g. health-care waste management plans), instruments or other measures required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSGs, and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines to, inter alia, ensure access to and allocation of Project benefits in a fair, equitable and inclusive manner, taking into account the needs of individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable including, as relevant, with regards to vaccines.</p> <p>c. Adopt procedures, protocols and/or other measures to ensure Project beneficiaries that receive vaccines under the Project do so under a program that does not include forced vaccination and is acceptable to the Bank, as set out in the ESMF.</p> <p>d. Ensure that the activities of the project comply with the Environmental and Social Standards (ESS) of the Bank’s Environmental and Social Framework (ESF), in particular ESS2 (Labor and Working Conditions) and the requirements of the national law. This will be done by preparing and disclosing the LMP which will identify the main labor requirements and risks associated with the project, and help the borrower determine the resources necessary to address project labor issues.</p>	<p>a. ESMF to be prepared, consulted upon, and disclosed by the Effective Date and will be used for screening of relevant project activities, identification of site-specific instruments and for overall guidance for the implementation of environmental and social aspects of the project which will be applicable throughout the project implementation. Any updates or changes to the approved ESMF will be agreed with the Bank prior to adoption.</p> <p>b. The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities in a timeframe of 90 days after signature of the project loan agreement, and shall thereafter be complied with, throughout the carrying out of such activities.</p> <p>c. Before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>d. The relevant LMP measures will be incorporated into the ESMF and will be implemented throughout project implementation.</p>	<p>MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Civil works. • Any activities that cause significant and irreversible environmental and social damage • Activities that may cause physical or economic displacement. • Activities that involve forced or child labor • All the other excluded activities are set out in the ESMF of the Project. 	During the assessment process conducted under action 1.2.a. above.	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH.
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2 including through, inter alia, implementing adequate occupational health and safety measures (including personal protective equipment, and emergency preparedness and response measures), setting out grievance mechanisms for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	The project's Labor-Management Procedures (LMP) to be prepared, by the Effective Date, and will be revised as relevant and when further information becomes available during project implementation. It will be implemented throughout the project and will be reflected in the progress report as per section A.	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH.
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2 and ESS10.</p>	Shall be operational prior to the hiring of project workers and shall be implemented throughout project implementation.	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMF and the LMP</p>	This will be part of the ESMF and LMP and will be implemented throughout project implementation	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH
2.4	<p>WORKERS TRAINING Implement training of Project workers in accordance with LMP and GBV/SEA/SH Action Plan requirements, including the Code of Conduct, Sexual Exploitation and Abuse; and Sexual Harassment in the workplace</p>	The trainings will be delivered throughout the project implementation	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: carry out the purchase, storage, transportation and handling of vaccines (including, ultra-cold chain management) in a safe manner and in accordance with the EHSGs, and other relevant GIIP including relevant WHO guidelines; and adequately manage, sterilize by autoclaving and dispose of health care wastes (including syringes and vaccines) and other types of hazardous and non-hazardous wastes outside of the solid municipal waste stream.	The provisions of this section will be part of the ESMF and will be maintained throughout the life of the Project	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH
3.2	Infection Control and Waste Management Plan (ICWMP).	This will be included as part of the ESMF and will be implemented throughout the life of the Project	MoPH Project Management Unit (PMU) in coordination with the Preventive Medicine Department at MoPH
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY: Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; establish and implement appropriate quality management systems to manage the risks and the impacts that services provided and activities carried out under the Project may have on community health and safety, prevent and respond to sexual exploitation and abuse, and sexual harassment and ensure universal access to vaccination services for persons with disabilities.	Throughout Project implementation and will be reflected in the progress report as per section A.	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.2	<p>USE OF MILITARY OR SECURITY PERSONNEL: The engagement of security or military personnel will be considered for deployment of vaccines. MoPH shall ensure that a communication strategy is in place to inform stakeholders of their involvement and the possibility of raising concerns and grievances on their conduct through the GM.</p> <p>The Internal Security Forces (ISF), the General Security Forces (GSF) and the State Security Forces (SSF), in coordination with the Ministry of Public Health (MoPH), will be responsible for assuring the safety of personnel and patients and provide security at the facilities where vaccines will be deployed. They will also contribute in organizing the citizens entrance and exit if necessary.</p> <p>Sensitization to military personnel on the existing Code Of Conduct for military personnel that was developed by the General Directorate of General Security (GDGS). The GDGS has issued a Code of Conduct to ensure that ethical, human, and legal standards govern the work of all GDGS officers and staff members during the execution of their duties mainly toward refugees. This existing Code of Conduct sets the principles of human rights, appropriate conduct, and prevention of abusive acts toward communities and vulnerable groups...</p>	Throughout Project implementation and will be reflected in the ESMF as per section 1.2 and in the progress report as per section A.	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH
4.3	<p>GBV AND SEA RISKS: Prepare, adopt, and implement a stand-alone Sexual Exploitation and Abuse/Sexual Harassment Prevention and Response Plan (SEA/SH Action Plan), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA/SH).</p>	Before the start of project activities	MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	N/A	N/A	N/A
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	N/A	N/A	N/A
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	N/A	N/A	N/A
ESS 8: CULTURAL HERITAGE			
	N/A	N/A	N/A
ESS 9: FINANCIAL INTERMEDIARIES			
	N/A	N/A	N/A
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>10.1 STAKEHOLDER ENGAGEMENT PLAN: Update the preliminary SEP which is cleared and disclosed by project appraisal and disclose, consult, adopt and implement the updated Stakeholder Engagement Plan (SEP) 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.</p>	<p>The MoPH has prepared, consulted and disclosed a preliminary SEP . The MoPH PMU conducted Stakeholder consultations on February 08, 2022. Seeing as to how organizations representing vulnerable groups and communities’ representatives and municipalities etc. did not attend this stakeholder consultation, the PMU will hold a follow up consultation session post project negotiations to ensure inclusive consultation and participation with all identified stakeholders and will update and redisclose the preliminary SEP by project effectiveness.</p> <p>The MoPH will continue to review the SEP throughout project implementation as needed. The SEP shall be implemented throughout Project implementation and will be reflected in the progress reports as per section A.</p>	<p>MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH</p>
<p>10.2 GRIEVANCE MECHANISM: An accessible grievance mechanism shall be established, publicized, maintained, and operated 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 beneficiaries including vulnerable groups and stakeholders, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall also receive, register and address concerns arising from unintended health consequences after vaccination especially those resulting in serious adverse effects.</p> <p>The GM will also have in place an appeal process in the event of unresolved grievances whereby a complainant who is unsatisfied with the response will have the option to escalate their grievance to Lebanese court.</p>	<p>The GM will be developed and operational prior to the Effective Date. The GM will be implemented throughout Project implementation and will be reflected in the progress report as per section A.</p>	<p>MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.3	<p>SEA/SH GRIEVANCE MECHANISM</p> <p>Implement, maintain, and operate a grievance mechanism for SEA/SH allegations relating to the Project. Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances related to SEA/SH risks. The existing project GM shall include referral pathways in the event of any SEA/SH-related complaint using a survivor-centered approach with focus on confidentiality and anonymity.</p>	<p>The SEA/SH GM will be developed prior to the Effective Date and will be implemented throughout project implementation</p>	<p>MoPH Project Management Unit (PMU) in collaboration with relevant department at the MOPH</p>
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training will be required for the PMU staff, on specific aspects of environmental & social risk management as per the ESF including on stakeholder engagement, occupational health & safety (OHS), grievance mechanism, SEA/SH, fair, equitable, and inclusive access, and allocation of Project benefits including with regards to vaccines.</p> <p>The training will be organized by observing the COVID-19 preventive measures as recommended by the MOPH, the guidance by WHO, and any other good international practices.</p>	<p>E&S-related training shall be delivered to the relevant staff as required, including front-line implementers not later than thirty (30) days of the Effective Date and periodically with the addition of new Project team members joining the Project throughout implementation.</p>	<p>Environmental and Social Safeguards specialist and GM officer that will be hired by MoPH in coordination with the Preventive Medicine Department at the MoPH.</p> <p>Subsequent reporting on training will be the responsibility of MoPH Environment and Social focal points.</p>