

**Lebanese Red Cross**

**Supporting Lebanon's COVID-19 Vaccination  
and Response for Vulnerable Group**

**P176778**

**ENVIRONMENTAL and SOCIAL  
COMMITMENT PLAN (ESCP)**

**[December 2021]**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. *Lebanese Red Cross* (hereinafter the Recipient) shall implement the *Supporting Lebanon's COVID-19 Vaccination and Response for Vulnerable Group (P176778)* Project (the **Project**), with the involvement of the following agency: *Palestine Red Crescent Society (PRCS)*. The *[International Bank for Reconstruction and Development]* (hereinafter the *[Bank]*) has agreed to provide financing for the Project.
2. The Recipient shall carry out the Project in accordance with the Environmental and Social Standards (**ESSs**). To this end, this Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions to be carried out or caused to be carried out by the Recipient, 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]*.
3. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by the Recipient as required by the ESCP and the provisions of the Grant Agreement<sup>1</sup>.
4. As agreed by the Bank and the Recipient, 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 Recipient *or 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 Recipient *or delegate(s)*. The Recipient/ *or delegate(s)* shall promptly disclose the updated ESCP.
5. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

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<sup>1</sup> Use "Financing Agreement" for IDA financing. Use "Loan Agreement for IBRD financing.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<b>REGULAR REPORTING:</b> 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 mechanism(s).	<b>Frequency:</b> Starting from the Effective Date, quarterly reports, shall be submitted no later than 20 days after the end of each reporting period, throughout Project implementation.	Planning section- PIU Project Manager and Environment and Social focal points, environmental and social specialist
B	<b>INCIDENTS AND ACCIDENTS:</b> 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 [ <i>including, inter alia, any COVID outbreak in the Project area</i> ]. Provide sufficient details 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/Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	<b>Frequency:</b> 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.	PIU Project Manager - Environment and Social focal points, environmental and social specialist
C	<b>CONTRACTORS MONTHLY REPORTS</b> In contracts for works using the Bank's standard procurement documents, contractors are required to provide monthly monitoring reports to the Project Implementing Unit. If needed, teams can include an action indicating that such monthly reports would be submitted to the Bank by the Borrower upon request	<b>Frequency:</b> On monthly basis and maintained throughout Project implementation.	PIU Project Manager - Environment and Social focal points, environmental and social specialist
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<b>ORGANIZATIONAL STRUCTURE:</b> The <i>Lebanese Red Cross (LRC)</i> shall establish and maintain a PIU for this project with qualified staff and resources, LRC will also recruit an environmental and social specialist to support management of ESHS risks and impacts of the Project and monitor the implementation of the environmental and social mitigation measures as set out in this ESCP.	The Lebanese Red Cross has appointed one Environmental and one Social focal points (those are staff currently employed by the Lebanese Red Cross) and will be maintained throughout the implementation phase. In addition, an environmental and social specialist will also be recruited by the Lebanese Red Cross to support in ESMF development and management of ESHS risks	PIU Project Manager and Lebanese Red Cross Human Resources Section

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<p>1.2 <b>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</b></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> which will be consulted upon, finalized, disclosed, and adopted for the Project, in line with the ESSs, the Environmental, Health and Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP), including relevant World Health Organization (WHO) guidelines.</p> <p>b. Prepare, disclose, consult, adopt and implement any environmental and social management plans (e.g. Infection Control and Waste Management Plan (ICWMP) part of the ESMF, instruments or other measures required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSs, 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 <b>as per the World Bank Directive: Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups and the WHO Framework for Allocation and Prioritization of COVID-19 Vaccination</b></p> <p>c. Incorporate the relevant aspects of this ESCP, including, inter alia, the ESMF, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p> <p>d. 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>a. <i>ESMF to be prepared, consulted upon in a manner satisfactory to the Bank by project signing; 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.</i></p> <p>b. The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities 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>a. <i>LRC currently formed a team to prepare a first draft ESMF.</i></p> <p>b. <i>LRC will hire an E&amp;S specialist to finalize the ESMF in coordination with PIU E&amp;S focal points.</i></p>

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1.3	<p><b>EXCLUSIONS:</b> Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> <li>-Any activities that cause significant and irreversible environmental and social damage</li> <li>- Civil works.</li> <li>- Activities that may cause physical or economic displacement.</li> <li>- Activities that involve forced or child labor.</li> </ul>	During the assessment process conducted under action 1.2.a. above.	LRC PIU, environmental and social specialist, and E&S assigned focal points
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES:</b></p> <p>Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.</p>	The project's Labor Management Procedures will be part of ESMF and will be revised as relevant and when further information becomes available during project implementation. It will be implemented throughout the project implementation.	LRC PIU, environmental and social specialist and E&S assigned focal points in coordination with LRC's Human Resources Section and LRC's medical direction,
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2 and ESS10.</p>	This will be part of the LMP and will be implemented throughout project implementation.	LRC PIU, environmental and social specialist, and E&S assigned focal points
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMF</p>	This will be part of the LMP and will be implemented throughout project implementation	LRC PIU, environmental and social specialist, and E&S assigned focal points
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures reflected in the Infection Control and Waste Management Plan ICWMP 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 EHSs, and other relevant GIIP including relevant WHO guidelines; and adequately manage and dispose of health care wastes (including, vaccines) and other types of hazardous and non-hazardous wastes.	ICWMP will be prepared as part of the ESMF. It will be implemented throughout the life of the Project.	LRC PIU, environmental and social specialist, and E&S assigned focal points
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b>                      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; manage the risks of the use of security personnel; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse, and sexual harassment.</p>	Throughout Project implementation.	LRC PIU, environmental and social specialist, and E&S assigned focal points
4.2	<p><b>USE OF MILITARY OR SECURITY PERSONNEL:</b>                      The Lebanese Red Cross does not have a private protection agency to protect its staff and volunteers, but it abides by the IFRC security agreement in addition to personnel security trainings sessions conducted to all the LRC staff and volunteers.</p>	N/A	N/A
4.3	<p><b>GBV AND SEA RISKS:</b> [For projects with a moderate, substantial, or high prevalence of GBV risk]                      Prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).</p>	Before the start of project activities	LRC PIU, environmental and social specialist, and E&S assigned focal points
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
	[Not relevant]	N/A	N/A
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
	Not relevant	N/A	N/A
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	Not relevant	N/A	N/A
<b>ESS 8: CULTURAL HERITAGE</b>			
	Not relevant	N/A	N/A
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not relevant	N/A	N/A

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
9.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</b> Update, adopt, and implement Stakeholder Engagement Plan (SEP)</p>	<p>A SEP was already prepared, and it will be disclosed by project appraisal. The SEP shall be implemented throughout Project implementation and will be revised as relevant</p>	<p>LRC PIU, environmental and social specialist, and E&amp;S assigned focal points</p>
9.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b> An accessible grievance mechanism is already established for the project but will be further strengthened with multiple uptake channels, as indicated in the SEP, 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-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 also be further strengthened to receive, register and address concerns and grievances related to the, sexual exploitation and abuse, sexual harassment in a safe and confidential manner and with a survivor centric approach, including through the referral of survivors to gender-based violence service providers.</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 project GM shall be implemented throughout project implementation and shall be further strengthened with multiple uptake channels and referral pathways for SEA/SH related complaints before project activities start</p>	<p>E&amp;S specialist that will be hired by LRC in coordination with the LRC Hotline team in collaboration with the Human Resource Section and assigned E&amp;S focal points.</p>
<b>CAPACITY SUPPORT (TRAINING)</b>			

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<p>CS1 Training will be required for the PIU staff, on specific aspects of environmental &amp; social risk management as per the ESF including on stakeholder engagement, occupational health &amp; safety (OHS), grievance mechanism, SEA/SH, fair, equitable and inclusive access and allocation of Project benefits including with regards to vaccines.</p> <p>The trainings will be organized observing the COVID-19 preventive measures as recommended by the MOPH, the guidance by WHO and any other good international practices.</p> <p>Ensure that all Project workers are adequately instructed and trained, on a regular basis, on prevention and reporting procedures available for SEA/SH as set out in ESMF and SEP.</p>	<p>E&amp;S-related training shall be delivered to relevant staff as required, including front-line implementers not later 30 days of the Effective Date and periodically with the addition of new Project team members join the Project throughout implementation.</p>	<p>E&amp;S consultant that will be hired by LRC in coordination with LRC's learning and development unit.</p> <p>Subsequent reporting on training will be the responsibility of LRC Environment and Social focal points.</p>