

The Lebanese Republic

The Green Agri-Food Transformation for Economic Recovery (GATE) Project (P180334)

Negotiation Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1 June 2023

Green Agri-food Transformation for Economic Recovery (GATE) (P180334)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Lebanese Republic (Recipient) will implement the “Green Agri-food transformation for economic recovery (GATE) (P180334) Project” (the Project), with the involvement of the Council for Development and Reconstruction (CDR), the Ministry of Agriculture (MoA) Green Plan (GP), the Ministry of Environment (MoE), the Ministry of Economy and Trade (MoET), and Kafalat, as set out in the Loan Agreement. The International Bank for Reconstruction and Development (the 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.
4. 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 Recipient through CDR, and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the CDR Director. The CDR shall promptly disclose the updated ESCP.

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|---------------------------------|--|---|---|
| MONITORING AND REPORTING | | | |
| A | <p>REGULAR REPORTING</p> <p>PCU Prepare and submit to the Bank regular monitoring reports on environmental, social, health and safety (ESHS) performance of the Project and sub-projects, 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 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> | Starting from the Effective Date, reporting every quarter throughout the Project implementation. Reports to be sent within 30 days after the reporting period ends. | CDR PCU |
| 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. • Major contamination to the environment. • Major impacts on ecosystem services. • Outbreak of life-threatening communicable disease, COVID-19 pandemic infection. • GBV, exploitation, discrimination, unresolved grievances. • Civil unrest, criminal and political attacks at worksites. • Forced labor and/or child labor by project contractor. • Project security personnel conflict with local communities. <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, at the Bank's 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 agreed time frame, as per the Bank's request.</p> <p>Notification/reporting requirements shall be in place throughout the Project implementation.</p> | CDR, PCU Environmental & Social Specialist. Kafalat SAL and participating FIs |
| C | CONTRACTORS' MONTHLY REPORTS | Prepared monthly by contractors submitted to the Bank upon request. | CDR |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|---|--|---|---|
| | 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 PCU, who will in turn submit them to the Bank upon request. | | PCU Environmental & Social Specialist GP E&S Focal Point |
| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | | |
| 1.1 | <p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain, throughout the Project implementation, an organizational structure, a Project Management Unit (PCU) including 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 with mandate, resources, and terms of reference satisfactory to the Bank.</p> <p>The PCU shall hire an Environmental and Social Specialist, whom 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. In addition, PCU needs to hire a Grievance Mechanism (GM) officer who will be responsible for ensuring adequate functioning of the GM, and proper documentation and follow up and resolution of grievances across all implementing agencies including with Kafalat and Green Plan. The GM officer will also ensure that all staff handling grievances across the implementing agencies have relevant capacity and awareness raising on the principles of the grievance mechanism including referrals, and incident reporting.</p> <p>Green Plan (GP) shall assign an Environmental and Social Focal Point, whom will be responsible for the day-to-day implementation of the E&S studies and instruments related to GP managed activities.</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 and Grievance Mechanism (GM) officer shall be hired before the start of project activities and shall be maintained throughout project implementation.</p> <p>The Kafalat E&S specialist and Green Plan E&S focal point shall be hired before the start of project activities and shall be maintained throughout project implementation</p> | CDR PCU Coordinator GP E&S Focal Point |
| 1.2 | <p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Update, disclose, consult upon, adopt, and implement the Environmental and Social Framework (ESMF), consistent with the requirements of the relevant ESSs and in a manner acceptable to the Bank.</p> <p>Prepare, disclose, adopt and implement the following site-specific instruments consistent with the relevant ESSs:</p> | 1. Adopt the ESMF which was cleared and disclosed on May 8, 2023The ESMF will be implemented throughout project implementation | CDR PCU Environmental & Social Specialist, CDR PCU GM Officer. GP E&S Focal Point |

| MATERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
|--|--|---|
| <p>Adopt and implement an Environmental and Social Management Plan (ESMP) or Environmental and Social Impact Assessment (ESIAs) for activities under component 2. These would include the following types of investment: (i) rehabilitation and modernization of public irrigation infrastructure including small community-/farmer-led irrigation developments (FLID) as well as larger agency-managed public irrigation infrastructure; (ii) construction and rehabilitation of rural feeder roads; (iii) development of local agricultural markets; (iv) optimizing the operation of existing wastewater (WW) treatment systems (including sludge management and WW re-use for agriculture); (v) optimizing the operation of existing solid waste (SW) management systems, including composting and biogas production from manure to reduce soil and water pollution.</p> | <p>2. Site specific ESMPs/ESIAs prepared and cleared before commencement of the related activities and implemented throughout project implementation period.</p> | |
| <p>1.3 MANAGEMENT OF CONTRACTORS 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> | <p>Prior to the Tendering /Contracting Phase and supervision during Project implementation</p> | <p>CDR PCU and implementing partners.</p> |
| <p>1.4 TECHNICAL ASSISTANCE 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 the PCU shall ensure that the outputs of such activities comply with the terms of reference.</p> | <p>Throughout Project implementation.</p> | <p>CDR PCU</p> |
| <p>1.5 CONTINGENT RESPONSE FINANCING 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. 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 [XX] of Schedule 2 of the loan agreement for the Project.</p> | <p>CDR PCU E&S Specialist</p> |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|---|---|--|---|
| | | 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. | |
| ESS 2: LABOR AND WORKING CONDITIONS | | | |
| 2.1 | LABOR MANAGEMENT PROCEDURES 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. The Borrower, through Kafalat, shall require Participating FIs to prepare and implement an LMP. | Implement and update the LMP which has been cleared and disclosed prior to appraisal throughout Project implementation | CDR PCU Environment & Social Specialist, CDR PCU GM Officer, GP E&S Focal Point, Kafalat PCU, participating financial intermediaries. |
| 2.2 | GRIEVANCE MECHANISM FOR PROJECT WORKERS <ul style="list-style-type: none"> Establish, maintain, and operate a Grievance Mechanism (GM) for Project workers, and Contractor/Supervising firms as described in the LMP and consistent with ESS2. | The GM, as part of the LMP, shall be operational one month from the Effective Date, and be maintained throughout Project implementation. | CDR PCU Environment & Social Specialist, CDR PCU GM Officer, GP E&S Focal Point, Kafalat PCU and participating financial intermediaries. |
| ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT | | | |
| 3.1 | PEST MANAGEMENT PLAN Prepare and adopt a Pest Management Plan (PMP), as part of the ESMF mentioned under action 1.2, to manage procurement and/or application of pesticides consistent with ESS3 requirements. The PCU shall ensure as per the ESMF that any high polluting activities are not supported under the project. | The PMP was prepared and disclosed on May 8, 2023 as part of the ESMF, and thereafter will be implemented throughout the project life. | CDR PCU Environment & Social Specialist. |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|---|---|---|--|
| | Contractors that undertake civil works shall be required to prepare and implement an ESMP which will include pest management measures to be eligible for funding under the Project. | Prior to the start of activities and implemented throughout project implementation. | |
| 3.2 | RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT As per the ESMF, incorporate requirements on resource conservation and pollution prevention and management, which will be defined at the sub-project level under the ESIA/ESMP to be prepared under action 1.2 above for component 2 activities. | Before the commencement of Component 2, ESIA/ESMPs need to be prepared including resource efficiency and pollution prevention and management requirements per the cleared and disclosed ESMF. Those requirements shall be implemented, maintained, and managed throughout Project implementation. | CDR PCU Environment & Social Specialist. GP E&S Focal Point |
| ESS 4: COMMUNITY HEALTH AND SAFETY | | | |
| 4.1 | TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP/ESIAs to be prepared under action 1.2 above. | As part of the ESMF Shall be maintained and managed throughout Project implementation. | CDR PCU Environment & Social Specialist. GP E&S Focal Point |
| 4.2 | COMMUNITY HEALTH AND SAFETY Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities under Action 1.2, including, inter alia, the potential for community exposure to communicable diseases and COVID-19 infections, impacts on provisioning ecosystem services, noxious emissions from waste, fire risks, response to emergency situations, and include these measures in the ESIA/ESMP in a manner acceptable to the Bank. | As part of the ESMF Shall be maintained and managed throughout Project implementation | CDR PCU and PCU Environment & Social Specialist. GP E&S Focal Point |
| 4.3 | SEA AND SH RISKS Prepare, adopt, and implement a Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Prevention and Response Plan (GBV Action Plan) as part of the ESMPs/ESIAs to be prepared under action 1.2 above, to assess and manage the risks of SEA/SH associated with the Project. | Include the SEA/SH Prevention and Response Plan as part of the ESIA/ESMPs to be prepared under action 1.2 above. The SEA/SH Prevention and Response Plan to be implemented throughout Project implementation | CDR PCU Environment & Social Specialist, CDR PCU GM Officer GP E&S Focal Point |
| 4.4 | Emergency Response Measures | Part of the LMP and ESIA/ESMPs | CDR PCU E&S Specialist |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|--|--|--|--|
| | Develop and implement measures to address emergency events and ensure coordination with measures under 2.4. Measures will be defined in the ESIAs/ESMPs and disseminated as part of the SEP. | | GP E&S Focal Point |
| ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY | | | |
| 5.1 | RESETTLEMENT POLICY FRAMEWORK Prepare, clear, adopt, and implement a Resettlement Framework (RF) as applicable and in accordance with ESS5. | The RF was prepared and disclosed on 25 April 2023. The RF will be implemented throughout project implementation. | CDR PCU Environment & Social Specialist. |
| 5.2 | RESETTLEMENT PLANS As needed, prepare, adopt and implement the respective Resettlement Action Plan (RAP) following the RF and consistent with ESS5. | As required, adopt and implement the respective RAPs prior to taking possession of the land and related assets. Full compensation has been provided and [as applicable] displaced people have been resettled and moving allowances have been provided. | CDR PCU Environment & Social Specialist. GP E&S Focal Point |
| 5.3 | GRIEVANCE MECHANISM The grievance mechanism (GM) shall address resettlement and land use restrictions (if applicable) related complaints, which is described in the SEP. | Prior to commencing Project activities and during the implementation of the Project. | CDR PCU Environment & Social Specialist and CDR PCU GM Officer. GP E&S Focal Point |
| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES | | | |
| 6.1 | BIODIVERSITY RISKS AND IMPACTS Activities that would have risks natural habitats, ecosystem services and Greenfields will be managed according to the requirements of the ESMF and site specific instruments as indicated under action 1.2 | Management measures for the protection of natural habitats are included in the cleared and disclosed ESMF. Those requirements shall be implemented, maintained, and managed throughout Project implementation. | CDR PCU Environment & Social Specialist. GP E&S Focal Point |
| ESS 9: FINANCIAL INTERMEDIARIES | | | |

| MATERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
|--|---|--|
| <p>9.1 ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) Maintain, and implement, and update as appropriate, the ESMS to identify, assess, manage, and monitor the environmental and social risks and impacts of FI subprojects that receive support from the project in the agri-food and agri-tourism sector pursuant to the requirements of ESF as per ESS9. This shall include ensuring that there is adequate capacity to maintain it through the appointment of the E&S specialists.</p> <p>KAFALAT SAL shall assign both a senior management representative to have overall accountability for environmental and social performance and a staff member or consultant as E&S Focal Point to manage the day-to-day implementation of ESMS. The Terms of Reference of the E&S Focal Point, including required technical skills and experience shall be included in the ESMS and Project Operations Manual (POM).</p> <p>KAFALAT SAL shall ensure that the project's exclusion list, following action 1.4, is adhered to in accordance with the Grant Agreement.</p> <p>During the implementation stage of this project MSEs receiving grants shall be screened against the project's exclusion list of the ESMS, categorized and assessed for their E&S risks and impacts prior to receiving any financing under the project.</p> | <p>The ESMS was updated, operationalized, as needed and disclosed on 26 April 2023 and prior to carrying out screening of any proposed FI subproject. Maintain and implement the ESMS throughout project implementation where required.</p> | <p>CDR PCU E&S Specialist, Kafalat, PCU Environment & Social Specialist.</p> |
| <p>9.2 EXCLUSIONS Screen all proposed activities and FI subprojects in the agri-food and agri-tourism sectors against the exclusion list set out in the ESMS.</p> | <p>Screen FI subprojects in the agri-food and agri-tourism sectors before determining whether they are eligible to receive support from the Project. .</p> | <p>Kafalat</p> |
| <p>9.3 FI ORGANIZATIONAL CAPACITY Establish an organizational capacity and competency for implementing the ESMS with clearly defined roles and responsibilities as per the requirements of ESS9.</p> <p>Present an organizational structure to the Bank that identify the specific positions and resources for E&S management.</p> | <p>This will be a disbursement condition for Categories 3 and 4 under the Loan Agreement and will be maintained throughout Project implementation.</p> | <p>Kafalat, PCU Environment & Social Specialist</p> |
| <p>9.4 SENIOR MANAGEMENT REPRESENTATIVE Designate a senior management representative to have overall accountability for environmental and social performance of subprojects that receive support from the Project.</p> | <p>The senior management representative needs to be designated and this will be set as a disbursement condition for Categories 3 and 4 under the Loan Agreement.</p> | <p>Kafalat, PMU Environment & Social Specialist</p> |
| ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | | |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|-------------------------------|---|--|--|
| 10.1 | <p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</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 PCU shall ensure that the SEP is amended and updated as required during the Project implementation following inclusive stakeholder consultations.</p> | <p>The SEP was disclosed on 29 April 2023, and will be updated as needed, throughout project implementation. The SEP will be implemented throughout the Project.</p> | <p>CDR PCU Environment & Social Specialist and CDR PCU GM Officer.</p> <p>GP E&S focal point</p> |
| 10.2 | <p>PROJECT GRIEVANCE MECHANISM</p> <p>Publicize, maintain, and operate an accessible grievance mechanism (GM), 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>GMs shall also be established within each of the Participating FIs to handle complaints and grievances relating to the project, in accordance with the requirements of ESS10 and in a manner acceptable to the Bank.</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> | <p>A GM shall be established and operationalized no later than one month from the Effective Date and shall be maintained throughout the Project implementation period as described in the SEP.</p> | <p>CDR PCU Environment & Social Specialist and CDR PCU GM Officer. Kafalat E&S specialist GP E&S focal point</p> |
| 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 Emergency preparedness and response Grievance mechanism Training on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations. Emergency preparedness and response and OHS measures related to COVID-19 as per the national health requirements Financial Intermediaries ESMS preparation, implementation, and monitoring. | <p>To be implemented during the first year of project implementation and as needed thereafter throughout the course of the project life-cycle.</p> | <p>CDR PCU E&S specialist and CDR PCU GM Officer</p> |
| CS2 | <p>Training shall be conducted for project workers and contractors, while maintaining training records on the following:</p> | <p>Prior to commencing works and throughout project implementation.</p> | <p>CDR PCU E&S specialist and CDR PCU GM Officer</p> |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|-------------------------------|--|-----------|--------------------|
| | <ul style="list-style-type: none">• Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.• Training on implementation of environmental and social due diligence documents (e.g., OHS, environmental and social assessments, 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• ESIA/ESMP implementation• LMP• GBV AND SEA/SH• Grievance mechanism | | |