# The Lebanese Republic Ministry of Energy and Water

## Electricity Services Emergency Support Project (P177846)

# Final ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

**12 February 2022** 

#### **LIST OF ACRONYMS**

AGP Arab Gas Pipeline

**ALARP** As Low as Reasonably Practicable

**COVID-19** Corona Virus Disease

**DAPP** Deir Ammar Power Plant

**EDL** Electricité du Liban

**E&S** Environmental and Social

**EHS** Environmental, Health and Safety

**ESHS** Environmental, Social, Health and Safety

**ESCP** Environmental and Social Commitment Plan

**ESF** Environment and Social Framework

**ESMF** Environmental and Social Management Framework

**ESMP** Environmental and Social Management Plan

**ESS** Environmental and Social Standard

FGRM Feedback and Grievance Redress Mechanism

**GBV** Gender Based Violence

**GRM** Grievance Redress Mechanism

**HAZID** Hazard Identification

**HSE** Health, Safety and Environment

IBRD International Bank for Reconstruction and Development

LABOR Management Procedures

Lebanon Oil Installations

#### THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

**LOPA** Layer of Protection Analysis

MEW Ministry of Energy and Water

MoE Ministry of Environment

MOPO Manual of Permitted Operations

OHS Occupational Health and Safety

PMU Project Management Unit

**PP** Power Plant

PAA Project Associated Actor

**QRA** Quantitative Risk Assessment

RAP Resettlement Action Plan

**RPF** Resettlement Policy Framework

**ROW** Right of Way

SEA/SH Sexual Exploitation and Abuse / Sexual Harassment

SEP Stakeholder Engagement Plan

**SIMOPS** Simultaneous Operations

**TOIL** Tripoli Oil Installations - Lebanon

WB World Bank

WBG World Bank Group

WHO World Health Organization

**WWTP** Wastewater Treatment Plant

#### I. ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- The Ministry of Energy and Water (MEW) Lebanon will implement The Electricity Services Emergency Support Project - P177846 (the Project), with the involvement of the following Project Associated Actors (PAAs): Lebanon Oil Installation, Tripoli Oil Installations – Lebanon, the Electricité du Liban (EDL) and Regional Water Establishments. The International Bank for Reconstruction and Development Association (hereinafter the World Bank) has agreed to provide financing for the Project.
- 2. The MEW will implement material measures and actions so that the Project is implemented in accordance with the World Bank's Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific document, plan and instrument to be prepared, updated, disclosed, consulted, adopted and implemented, all in a manner acceptable to the Bank as well as the timing for each of these.
- 3. The MEW will also comply with the provisions of any other Environmental and Social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as Environmental and Social Management Plans (ESMPs), Labor Management Procedure (LMP), Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF)/Resettlement Action Plan (RAP), and Stakeholder Engagement Plan (SEP), and the timelines specified in this ESCP.
- 4. The MEW is responsible for compliance with all requirements of the ESCP and will monitor the implementation of specific measures and actions conducted by other PAAs.
- 5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the World Bank by the MEW as required by the ESCP and the conditions of the legal agreement, and the World Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
- 6. As agreed by the World Bank and the MEW, 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, MEW will agree to the changes with the World Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the World Bank and the MEW. The MEW will promptly disclose the updated ESCP.
- 7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the MEW will provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts, and social impacts, COVID-19 transmission risks, gender-based violence, and sexual exploitation and abuse / sexual harassment.

Material measures and actions are listed in the table below.

	MATERIAL MEASURES AND ACTIONS	Timeframe	Responsibility
	MONITORING AND REPORTING		
Α	REGULAR REPORTING  MEW will 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), 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.	Starting from implementation of project activities, the Project, reporting every 3 months throughout the Project implementation. Reports to be sent within 15 days after the end of the reporting period.	MEW
В	<ol> <li>INCIDENTS AND ACCIDENTS</li> <li>MEW will 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:         <ul> <li>Occupational Health and Safety Issues</li> <li>Outbreak of life-threatening communicable disease, COVID-19 pandemic infection</li> <li>GBV, exploitation, discrimination, unresolved grievances</li> <li>Civil unrest, criminal and political attacks at worksites</li> <li>Forced and/or child labor by project contractor</li> <li>Project security personnel conflict with local communities</li> </ul> </li> <li>MEW will 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.</li> <li>MEW will, 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</li> </ol>	Throughout the Project implementation, report any incident or accident to the Bank within 48 hours after becoming aware of the occurrence of the incident or accident.  A detailed incident/accident report, to be followed by Root Cause Analysis Report (as needed), will be provided within 10 days of the initial notification to the Bank as requested.  File a closure report within 30 days or agreed timeframe, as agreed with the Bank.	MEW
С	prevent its recurrence.  CONTRACTORS MONTHLY REPORTS  Monthly Environment, Social, Health and Safety (ESHS) reports will be prepared by Contractors / Operators and submitted to MEW	Monthly	MEW
ESS1	ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
1.1	ORGANIZATIONAL STRUCTURE  MEW will establish and maintain an organizational structure through the establishment of a Project Management Unit (PMU), staffed with qualified environmental and social specialists and consultants as needed, to support management of environmental, social, health and safety (ESHS)	The organizational structure will be finalized before commencement of any physical	MEW

	MA	TERIAL MEASURES AND ACTIONS	Timeframe	Responsibility
		es and impacts of the Project, all with composition, mandate, resources, and terms of erence satisfactory to the Bank.	interventions maintained throughout Project Implementation.	
	and the	W will ensure that each of the relevant Project Associated Actors (PAAs) has ESHS specialists consultants to supervise and ensure implementation of E&S requirements. MEW will support PAAs in preparing specific scope of work necessary for the EHS specialist(s)/consultant(s) to form the required duties.	At the time of establishment of the PMU, the E&S specialist will be hired and will be maintained throughout Project implementation. E&S staffing of the PAAs will	
	Environmental and social consultants (individuals or firms) will be hired, as needed, to support the PMU and PAAs. Terms of References for all ESHS positions in the project will be shared with the Bank for review and no-objection.		be completed before commencement of any physical interventions	
	EN	VIRONMENTAL AND SOCIAL ASSESSMENT		
1.2	A.	The outcomes and recommendations of the prepared E & S Review report, and any future updates, will be implemented by the Borrower.	A. Compliance actions with national legal E&S requirements and WB relevant ESSs will be implemented before repair/rehabilitation	
	В.	The following studies will be prepared, and actions implemented according to the Bank's ESF and national laws. After Bank clearance, the E&S documents will be disclosed in country and on the Bank's external website.	and operation. Outcomes and recommendations of E&S assessments will be adopted throughout project implementation	
	For Deir Ammar Power Plant- DAPP (Component 1):		B. (1), Before and during gas commissioning and testing	
	1.	Baseline measurements for ambient condition (e.g. air emissions, noise, vibration, sea water quality, marine biodiversity, etc.).	B. (2), (3) & (4): Before power plant commercial operation using natural gas. The	
	2.	Environmental and Social Management Plan (ESMP) addressing baseline conditions including marine ecological survey, environmental measurements (air, noise, vibration, and water quality) E&S impacts, mitigation measures, monitoring plan and implementation budget. The ESMP will include a requirement for third-party environmental audit and	third-party audit and inspection will be carried out annually after commercial operation of DAPP.	MEW
		inspections of DAPP to be conducted on behalf of MEW.	B. (5), (6) & (7): Before natural gas	
	3.	Emergency Response Plan (ERP) following national requirements, WBG EHS Guidelines for thermal power plants and relevant Good International Industry Practice (GIIP).	commissioning and testing of the pipeline and its facilities	
	4.	Occupational Health and Safety (OHS) Plan following national requirements, WBG EHS Guidelines for thermal power plants and relevant Good International Industry Practice (GIIP).	B. (8): Before final selection of beneficiary RWEs where the PV and Scada systems will be installed.	
	Foi	r Arab Gas Pipeline - AGP and its facilities (Component 1):	B. (9) Before commencement of procurement to be part of bidding documents and	
		<ol> <li>Environmental and Social Management Plan (ESMP) addressing baseline conditions, commissioning &amp; testing as well as operational E&amp;S impacts, mitigation measures, monitoring plan and implementation budget.</li> </ol>	work/supply contracts.	
	J.		B. (10) In parallel with carrying out, as an integral part of, the TA.	
	6.	Safety studies, following national requirements, WBG EHS Guidelines for onshore oil and gas facilities and relevant Good International Industry Practice (GIIP), including (Hazard Identification - HAZID, Hazardous Area Classification (for AGP stations), Quantitative Risk		

MATERIAL MEASURES AND ACTIONS Timeframe Responsibility

Assessment – QRA (for the power plant, PRS and receiving station), Hazardous Operation – HAZOP (for the pipeline), Fire and explosion analysis, Dedicated Operations Safety Case (includes Manual of Permitted Operations - MOPO, As Low As Reasonably Practicable – ALARP), OHS Plans and Emergency Response Plan (ERP)

7. Right of Way (ROW) Survey to identify permissible and non-permissible activities on the ROW and the safety buffer area as identified by the risk studies.

Note: Both DAPP and AGP ESMPs will also address the gaps already identified in the E&S Review Report. Corrective actions and an effective monitoring program will be proposed and committed to as part of each ESMP, which will be submitted for approval by both MOE and WB.

## For installation and operation of solar PV systems and SCADA Control systems (Component 2.1):

8. Environmental and Social Management Framework (ESMF) addressing risks and impacts associated with Component 2.1 and developing exclusion criteria for Regional Water Establishments which are not eligible for funding under Component 2.1 based on environmental and social considerations (e.g., any biodiversity impacts, increase in water pollution and extraction beyond an agreed quantity, any resettlement impacts or impacts on cultural heritage...etc.).

#### For the rehabilitation and operation of Hrache hydro plant (Component 2.2):

 Environmental and Social Management Plan (ESMP) addressing all potential risks and impacts, mitigation and monitoring plans during the rehabilitation and operation of the hydro plant and implementation budget.

### For Technical Assistance (Component 3) TA activities, including feasibility studies, bidding documents, etc., conducted under the Project

10. Relevant environmental and social assessment (ESA) studies to assess the E&S impacts associated with the TA outcomes according to the Bank's ESF and national law requirements. E&S documents will be disclosed locally and by the Bank. If the interventions identified under Type 1 and Type 2 TA will be financed by the project, the Outcomes and recommendations of the ESA studies will be implemented and complied-with throughout the implementation of the TA outcomes according to the cleared E&S documents

		Timeframe	Responsibility
	MATERIAL MEASURES AND ACTIONS	Timetranie	Responsibility
1.3	MANAGEMENT OF CONTRACTORS  MEW will incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors (Operating Companies). Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. In addition, the MEW will require bidders to provide two declarations: a Forced Labor Performance Declaration (which covers past performance), and a Forced Labor Declaration (which covers future commitments) to prevent, monitor and report on any forced labor, cascading the requirements to their own sub-contractors and suppliers. Moreover, the MEW will include enhanced language on the prohibition of forced labor in the procurement contracts"	Prior to the tendering / Contracting Phase (Rehabilitation and Operating Companies) and supervision during Project implementation	MEW
ESS2	LABOR AND WORKING CONDITIONS		
2.1	<ul> <li>a) The Project will be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing necessary occupational health and safety measures (including emergency preparedness and response measures), establishing out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors.</li> <li>b) MEW will prepare, disclose, consult, adopt and implement a stand-alone LMP for both components 1 and 2 of the project incorporating the relevant requirements of ESS2, in a manner acceptable to the Bank, that address the terms and conditions of employment, non-discrimination and equal opportunity for employment, worker's organizations, restrictions on child and forced labor, occupational health and safety (OHS) including measures related to COVID-19 as per the national health requirements in response to the pandemic, and grievance mechanism for Project workers (as per item 1.1 above for relevant instruments).</li> <li>c) MEW will ensure that provisions for primary supply workers and potential risks of forced labor in the solar panels supply chain are included in the LMP.</li> <li>d) MEW will require Contractor/Sub-contractor and Supervising firms to implement the LMP, in the terms according to (a) and (b) of item 2.1 and item 1.3.</li> </ul>	LMP will be prepared, disclosed, consulted on, and adopted before commencement of	MEW
2.2	<ul> <li>GRIEVANCE MECHANISM FOR PROJECT WORKERS</li> <li>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 will have the following characteristics:</li> <li>Proportionate to the nature and scale of the project and its risks and impacts.</li> <li>Addresses 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.</li> </ul>	The GM, as part of the LMP, will be operational by or before commencement of relevant project activities and before disbursement of retroactive financing for related actions. GM will be maintained throughout Project implementation.	MEW

	MATERIAL MEASURES AND ACTIONS	Timeframe	Responsibility	
	<ul> <li>Operates 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);</li> </ul>			
	- Roles and responsibilities will be assigned to competent staff who will receive necessary training			
	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES			
	MEW will:			
2.3	- prepare, adopt, and implement the outcomes of the Occupational, Health and Safety (OHS) Plan specified under 1.2 above.	Measures will be implemented and maintained throughout Project	IVIEVV	
	<ul> <li>promote safety and health in the work environment and will require from Contractor/Subcontractor/Operating firms to do the same, in accordance with the requirements of ESS2 and in a manner acceptable to the Bank.</li> </ul>	implementation.		
2.4	EMERGENCY PREPAREDNESS AND RESPONSE: As part of the ERP measures specified in 1.2, include measures on emergency preparedness and response, complying with World Bank Group Guidelines for Construction and Decommissioning, in addition to the Industry Sector Guidelines for Thermal Power and for Onshore Oil and Gas Development, and ensure coordination with measures under 4.4.	As part of the LMP and implemented throughout the Project implementation	MEW	
2.5	PROJECT WORKERS TRAINING: Implement training of Project Workers on OHS awareness of risks and to mitigate impacts on local communities.	As part of the LMP and implemented throughout the Project implementation	MEW	
ESS3	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	WASTE MANAGEMENT PLANS			
3.1	MEW to prepare, adopt and implement the outcomes of the following specific plans:  A. Hazardous materials/chemicals management plan (DAPP and AGP)	A and B before commercial operation of DAPP and AGP $$	MEW	
	<ul><li>B. Hazardous waste management plans (DAPP and AGP)</li><li>C. Electric and electronics waste management plan (Component 2.1)</li></ul>	C: Before installation of PV panels and SCADA systems in RWEs	2	
	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.2	MEW will adopt and implement resource efficiency and pollution prevention and management measures, which will be defined under the E&S instruments (ESMPs and ESMF) prepared under item 1.2 above. The gaps already identified in the E&S Review Report for component 1 interventions will be adopted and implemented.	Adoption of measures will be maintained and managed throughout Project implementation.	MEW	

	MATERIAL MEASURES AND ACTIONS	Timeframe	Responsibility
ESS4	COMMUNITY HEALTH AND SAFETY		
	TRAFFIC AND ROAD SAFETY		
4.1	MEW will adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMP to be developed under action 1.2 above and will address the gaps already identified in the E&S Review Report.  Guidelines will be defined in the ESMP.	Adoption of traffic and road safety measures will be maintained and managed throughout Project implementation.	MEW
	COMMUNITY HEALTH AND SAFETY	Prior to rehabilitation or any civil works.	
4.2	MEW will 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, response to emergency situations, and include these measures in the ESMP in a	Hydrostatic testing to be completed by commissioning of the pipeline and prior to its operation.	MEW
	manner acceptable to the Bank. Specific measures shall include conducting hydrostatic test for the pipeline.	Measures will be adopted and maintained throughout Project implementation.	
	GBV AND SEA RISKS	Preparation of a standalone SEA/SH Prevention and Response Plan before	
4.3	An SEA/SH Prevention and Response will adopt and maintain mitigation measures proportionate to the risk, these will include the provision of signing of codes of conduct for all project workers, including MEW staff and contractors/training providers; the establishment and monitoring of Grievance Mechanism sensitive to SEA/SH and referral mechanisms.	commencement of relevant project activities and before disbursement of retroactive financing for related actions. SEA/SH Prevention and Response Plan will be implemented throughout project implementation	MEW
	EMERGENCY RESPONSE MEASURES	·	
4.4	Develop and implement measures to address emergency events and ensure coordination with measures under 1.2 and 2.4. Measures will be defined in the ESMPs, OHS plans and disseminated as part of the SEP	As per items 1.2 and 2.4 above	MEW
	SECURITY PERSONNEL	The Security Personnel Management Plan will	
4.5	MEW will prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank. This includes preparing a stand-alone Code of Conduct for security personnel, which security personnel will sign off on, and will be trained on for proper response in case of interaction with the local	be submitted for the Bank's approval before commencement of relevant project activities and before disbursement of retroactive financing for related actions.	MEW
	communities.	Will be maintained and managed throughout Project implementation.	

	MATERIAL MEASURES AND ACTIONS	Timeframe	Responsibility
ESS5	LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		
5.1	RESETTLEMENT PLANS  MEW will prepare, adopt, and implement a Resettlement Plan (RAP) or a Livelihood Restoration Plan (LRP) as applicable and in accordance with ESS 5. MEW will thereafter adopt and implement the respective RAP/LRP before carrying out the associated activities, in a manner acceptable to the Bank.	As required, an RAP / LRP will be prepared and submitted for the Bank's approval; once approved, the RAP / LRP will be implemented prior to commencing Project activities.	MEW
5.2	GRIEVANCE REDRESS MECHANISM  The grievance redress mechanism (GRM) will address resettlement (if applicable) and/or related complaints, which will be described in the RAP/LRP and SEP.	Prior to commencing Project activities that involve any resettlement and during the implementation of the Project	MEW
ESS6	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES		
6.1	A) Marine biodiversity assessment will be conducted for the coastal area where DAPP is discharging cooling water and treated effluents. Risks, especially will be addressed in the ESMP, in a manner acceptable to the Bank. Mitigation measures resulting as outcomes of the assessment will be adopted and implemented.  B) Potential impacts on Palm Island Marine Protectorate will be assessed as part of DAPP ESMP and upon consultation with Protectorate management as per the SEP. Relevant recommendations will be adopted and implemented.	A) Assessment to be conducted prior to commercial operation of the DAPP.      B) Consultation with Palm island management to take place as part of the SEP and DAPP ESMP consultation  Adoption of mitigation measures will be throughout project implementation	MEW
ESS7	INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES		
	Not Applicable to Project		
ESS8	CULTURAL HERITAGE		
	Not Applicable to Project		
ESS9	FINANCIAL INTERMEDIARIES		
	Not Applicable to Project		

	MATERIAL MEASURES AND ACTIONS	Timeframe	Responsibility
ESS10	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION	The SEP will be disclosed before appraisal. SEP	
10.1	MEW has prepared a SEP that is expected to be disclosed in January 2022 before appraisal. MEW will update, disclose, consult, adopt and implement the Stakeholder Engagement Plan (SEP) consistently with ESS10 in a manner acceptable to the Bank. The MEW will ensure that the SEP is amended and updated as required during the Project implementation following inclusive stakeholder consultations.	will be updated before commencement of relevant project activities and before disbursement of retroactive financing for related actions and as needed throughout project implementation. The SEP will be implemented throughout the Project.	MEW
10.2	PROJECT GRIEVANCE MECHANISM  Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP	Throughout project implementation as described in the SEP under section 10.1	MEW
10.3	SEA/SH GRIEVANCE MECHANISM  Implement, maintain and operate a grievance mechanism for SEA/SH allegations relating to the Project. Accessible grievance arrangements will be made publicly available to receive and facilitate resolution of concerns and grievances related to SEA/SH risks. The existing project GM will include referral pathways in the event of any SEA/SH-related complaint using a survivor-centered approach with focus on confidentiality and anonymity.	The SEA/SH GM will be established after appraisal, before commencement of relevant project activities and before disbursement of retroactive financing for related actions and will be implemented throughout project implementation	MEW
cs	CAPACITY SUPPORT (TRAINING)		-
CS1	Training and information dissemination to the public and community leaders as well as local authorities (Governor, District Commissioner, Municipality officials, Civil Defense, Fire Brigade,), and others as identified in the SEP) on the following as relevant to them:  - Stakeholder mapping and engagement  - Specific aspects of the ESMP 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 mechanisms	Following SEP disclosure and as soon as specific elements are completed.	MEW
CS2	Training will be conducted for HSE managers of the Deir Ammar Power Plant and of TOIL-AGP department and/or the operator to sensitize them on community health and safety; the HSE managers will in turn transfer the knowledge through training employees and workers as well as subcontractors while maintaining training records on the following:  - ESMP implementation  - GRM  - GBV AND SEA/SH	Prior to Testing and Commissioning, then maintained with refresher courses during the implementation phase.	MEW

MATERIAL MEASURES AND ACTIONS	Timeframe	Responsibility
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- LMP
- OHS including emergency preparedness and response