

Lebanese Republic
Electricité du Liban / Litani River Authority

**Lebanon Renewable Energy and System
Reinforcement Project (P180501)**

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN**

September 4, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Lebanese Republic (the Borrower) will be implementing the Lebanon Renewable Energy and System Reinforcement Project (P180501), with the involvement of Electricité du Liban (EDL) and the Litani River Authority (LRA) as the Project Implementing Entities as set out in the Loan Agreement. The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing for the Project.
2. The Borrower shall ensure, and shall cause EDL and LRA to take actions to 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, the 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 Borrower 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 prepared, adopted, and implemented under the Project, all of which shall be consistent with the ESSs, 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 Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of unforeseen circumstances or in response to the Project's E&S performance. In such circumstances, the Borrower through the EDL and LRA and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower. The Borrower shall, and shall cause EDL and LRA, to promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>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, the status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms. Reports shall cover performance by EDL and LRA, their Owner’s Engineers, and Contractors, and shall include copies of the reports submitted by Owner’s Engineers and Contractors.</p>	<p>Starting from the Effective Date, throughout Project implementation.</p> <p>Submit quarterly reports within 15 days after the end of each reporting period.</p>	EDL and LRA
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, inter alia, cases sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or planned to be taken to address it, and any information provided by any Contractor and/or Owner’s Engineer, as appropriate.</p> <p>Subsequently, at the Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the World Bank within a timeframe acceptable to the World Bank.</p>	EDL and LRA
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require Contractors and Owner’s Engineers to provide monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit the reports to the World Bank.</p>	<p>Include requirement in construction/ rehabilitation contracts for reports to be submitted monthly, beginning one month after execution of contracts.</p> <p>Submit the monthly reports to the Bank [upon request].</p>	EDL and LRA
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain Project Management Teams (PMTs) within LRA and EDL with qualified staff and resources to support management of ESHS risks and impacts of the Project, including hiring an environmental and social (E&S) specialist at EDL and an E&S focal point at LRA. Include on the PMTs at least one specialist with OHS training and/or certification.</p> <p>Ensure appointment of qualified OHS specialist to each Contractor and Owner’s Engineer team to ensure compliance with national law and the Bank EHS General Guidelines.</p>	<p>The organizational structure will be finalized before Effective Date. This structure shall be maintained throughout Project implementation.</p> <p>The EDL PMT Environmental and Social (E&S) specialists shall be hired before Effective Date and shall be maintained throughout project implementation. The LRA PMT E&S focal point shall be assigned before Effective Date and shall be maintained throughout project implementation.</p> <p>Assign OHS specialist/focal point at LRA and EDL PMTs before commencement of project rehabilitation/construction activities.</p>	EDL and LRA
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Prepare, disclose, consult upon, adopt and implement the following site-specific instruments, consistent with the relevant ESSs, the WBG EHS General Environmental, Health, and Safety (EHS) Guidelines, the EHS Guidelines for Electric Power Transmission and Distribution, and other Good International Industry Practice.</p> <ul style="list-style-type: none"> • ESIA for the construction and operation of solar PV power plant development including specific measures for (i) upgrading existing substation(s), (ii) construction and operation of new substation(s), and (iii) installation of high- and medium- voltage transmission line(s). • Simplified ESMP for the construction and operation of the NCC building. <p>Implement and update as needed the following instruments:</p> <ul style="list-style-type: none"> • Audit and ESMP for the rehabilitation and operation of the three HPPs • E&S Screening of the Solar PV Power Generation Sites 	<p>Prepare, disclose, consult upon, and adopt the following E&S instruments, before issuance of the works bidding documents and implement throughout project implementation:</p> <ul style="list-style-type: none"> • ESIA for the solar PV power plant. • Simplified ESMP for the NCC building. <p>The following shall be finalized before Project Effective Date:</p> <ul style="list-style-type: none"> • The audit and ESMP for the rehabilitation and operation of the three HPPs disclosed on 23 August 2024. • The E&S screening report for the solar PV power generation sites disclosed on 23 August 2024 	EDL and LRA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Prepare, adopt and implement the ESMP for the NCC building and the ESIA for the solar PV plant before issuance of the bidding documents. These instruments shall be adopted and implemented throughout the project implementation.	
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, the relevant requirements of the E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of procurement documents and contracts with Contractors, and Owner’s Engineers. Thereafter ensure that the Contractors and Owner’s Engineers comply and cause subcontractors to comply with the ESHS specifications of their contracts.</p>	Incorporate prior to the tendering / Contracting Phase (and Supervise contractors during Project implementation.	EDL and LRA
	Require that the monthly construction progress meetings include review and discussion of Contractor ESHS performance during the period and require all parties’ project and ESHS/HSE managers to attend/participate.	Throughout Project construction.	EDL and LRA
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that consultancies, studies, capacity building, training, and any other technical assistance activities under the Project, including, <i>inter alia</i>, the environmental and social instruments to be supported under the Project, are carried out in accordance with terms of reference acceptable to the World Bank and are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	EDL and LRA
1.5	<p>ASSOCIATED FACILITIES</p> <p>If any other facilities are identified during the E&S assessment process as being Associated Facilities within the meaning of ESS1, ensure that planning, development, and operation of those facilities are carried out in accordance with the applicable requirements of this ESCP, the ESSs, and the E&S instruments.</p>	Throughout Project implementation.	EDL and LRA
1.6	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>Ensure that the Contingent Emergency Response Component Manual (CERCM) as specified the Loan Agreement includes a description of the ESHS assessment</p>	The adoption of the CERCM in form and substance acceptable to the Bank is a withdrawal condition under Section I.G of	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>and management for the implementation of Component 4 of the Project, in accordance with the ESSs.</p> <p>Adopt any E&S instruments that may be required for activities under Component 4 of the Project in accordance with the CERCM 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>Schedule 2 of the Loan Agreement for the Project.</p> <p>Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation</p>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Finalize, disclose, adopt and implement the Labor Management Procedures (LMP) that have been developed for the Project including, <i>inter alia</i>, provisions on working conditions, management of workers relationships, occupational health and safety, code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and Owner’s Engineers.</p>	Finalize and disclose LMP no later than one month after the Effective Date and implement throughout the Project implementation.	EDL and LRA
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY</p> <p>Appoint a certified OHS specialist to conduct an audit of OHS practices and conditions at each operating HPP and prepare a report that documents risks, potential impacts, and actions that should be taken to reduce risks to acceptable levels in accordance with ESS2 and the WBG General EHS Guidelines.</p>	Before implementation of relevant rehabilitation activities.	LRA
	<p>Develop, adopt, and implement Occupational Health and Safety Plans for operations, for the Solar PV power plant and each HPP. HPP-specific OHS requirements to be developed based on activity-specific risks and impacts. OHS plans for existing HPPs must include requirements to implement the corrective measures and ongoing requirements that are identified in the OHS audit.</p>	<ul style="list-style-type: none"> • LRA: develop and adopt within 30 days of final HPPs audit report. • EDL: develop and adopt prior to commissioning of solar plant. • Implement: throughout operations. • OHS plans for rehabilitation or new construction to be prepared as part of the relevant instruments under 1.2 above. 	EDL and LRA
2.3	<p>EMERGENCY RESPONSE PLANS</p>	Within 30 days after OHS audit	LRA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Develop and/or update ESHS Emergency Preparedness Response Plans for existing HPPs as recommended in the OHS audit, including schedule for future updates		
	Develop, adopt, and implement Emergency Preparedness Response Plans for solar power plant, including schedule for future updates.	Develop as part of the ESIA , adopt prior to commissioning, implement throughout Project implementation.	EDL
	Review and approve Contractors’ Emergency Preparedness and Response Management Plans for rehabilitation and construction activities.	Prior to Contractor mobilization to the site.	EDL and LRA
2.4	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the relevant Labor Management Procedures and consistent with ESS2. [The grievance mechanism must include a channel to enable workers to report sensitive grievances confidentially and anonymously, outside their normal lines of management communications. The GRM will be available to all Project workers, including civil servants serving the Project, direct employees, and contracted employees.]	Establish prior to engaging Project workers, implement throughout Project implementation.	EDL and LRA
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE AND MATERIALS MANAGEMENT Adopt and implement a Waste Management Plan (WMP) to manage hazardous and non-hazardous wastes, consistent with ESS3 for all relevant rehabilitation, construction activities and operations.	<ul style="list-style-type: none"> Develop WMPs as part of the relevant E&S instruments under 1.2 above. Adopt and Implement: throughout Project implementation. 	LRA and EDL
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the E&S instruments to be prepared under action 1.2 above and in the management plans under 2.1 and 3.1	Same timeframe as for the adoption and implementation of the E&S instruments under 1.2 and the plans under 2.1 and 2.2.	EDL and LRA
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	SECURITY PERSONNEL Assess and implement measures to manage the security risks of the Project in the ESIA for the solar PV plant, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	Assess prior to engaging security personnel and implement throughout Project implementation.	EDL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities at the NCC building, HPPs, and solar PV plant (and their associated infrastructure such as transmission lines and substations) and include mitigation measures in the ESMPs to be prepared and ESIA to be prepared under action 1.2 above</p>	Same timeframe as for the adoption and implementation of the ESMPs and ESIA under requirement 1.2 above.	EDL and LRA
4.3	<p>SEA AND SH RISKS</p> <p>Prepare and implement a SEA/SH Action Plan as part of the LMP as per Action 2.1 above, to assess and manage the risks of SEA and SH.</p>	Prepare as part of the LMP and per the time frame stipulated in under requirement 2.1 above and implement throughout Project implementation.	EDL and LRA
4.4	<p>DAM SAFETY</p> <p>1. Establish and maintain and convene the independent Dam Safety Panel of Experts (DSPOE) for reviewing and confirming the adequacy of the design, quality of construction works, and advising on additional dam safety measures including dam safety plans</p>	Appoint prior to the disbursement of eligible expenses under Category (3) of the withdrawal table under Section III.A of Schedule 2 to the Loan Agreement, and thereafter maintain throughout Project implementation.	LRA
	<p>2. Inform the Bank in advance of the DSPOE meetings and share with it a copy of the DSPOE report of its conclusion and recommendations signed by each participating member after each meeting. Implement the recommendations made by the DSPOE, unless otherwise agreed to in writing by the Bank.</p>	Throughout Project implementation.	LRA
	<p>3. Commission hydrological study to evaluate the capacity of existing spillways at Qaraoun dam to safely discharge floods with various return periods, including Probable Maximum Flood (PMF), and design a program for financing and implementation of remedial measures, depending on the results of the study</p>	Finalize the study by June 30, 2025 and design the program if required with DSPOE guidance.	LRA
	<p>4. Prepare and update, as required and in form and substance acceptable to the Bank and implement the following plans (“Dam Safety Plans”) for Qaraoun dam: (i) the Construction Supervision and Quality Assurance Plan, if remedial dam safety improvement works are required following Tier 2 dam safety assessment; (ii) the Instrumentation Plan; (iii) the Operation and Maintenance Plan (O&M Plan); and (iv) the Emergency Preparedness Plan (EPP). Prepare and update, in format and substance acceptable to the Bank, and implement the following Dam Safety Plans for Anan and Awali dams: (i) the instrumentation plan; (ii) O&M plan; and (iii) EPP.</p>	Prepare and adopt by May 30, 2026 and, thereafter, implement throughout Project implementation	LRA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	5. Undertake Tier 2 dam safety assessment of the Qaraoun Dam and implement the recommended remedial measures including those from Tier 1 assessment, such as installation of monitoring instruments, survey and treatment of concrete face slab joints, and so on. The safety assessment will be undertaken in combination or coordination with hydrological study.	<ul style="list-style-type: none"> Finalize all required dam safety assessment by September 30, 2025. Undertake required remedies based on the timeframe to be agreed with the DSPOE. 	LRA
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>The ESIA under requirement 1.2 must include a biodiversity survey, in the appropriate season, by one or more qualified biologists to identify populations or specimens of endemic species that may be present and affected by the Solar PV power plant development.</p> <p>If the survey under 6.1 determines that the habitat is of significant importance to one or more endemic species or to one or more Endangered or Critically Endangered species, as listed in the IUCN Red List or Lebanon’s Red Book, prepare and implement a Biodiversity Management Plan (BMP) that is acceptable to the World Bank and meets the requirements of paragraphs 24 through 27 ESS6.</p>	Conduct biodiversity survey and, if necessary depending on the outcome of the biodiversity survey) prepare BMP as part of PV ESIA under requirement 1.2 above, adopt and implement thereafter.	EDL
6.2	If the ESIA under requirement 1.2 determines that any part of the solar development is to be located within the Semi-Desert Area of Ras Baalbek Important Bird Area (IBA) or will have an adverse effect on the IBA, prepare and implement a Biodiversity Management Plan (BMP) that prepare and implement a Biodiversity Management Plan (BMP) that is acceptable to the World Bank and meets the requirements of paragraphs 24 through 27 ESS6.	<p>Determine if solar plant is within or will have adverse effect on the IBA and if necessary, prepare BMP as part of ESIA under requirement 1.2 above.</p> <p>Adopt and implement BMP throughout project implementation, as required by BMP.</p>	EDL
ESS 8: CULTURAL HERITAGE			
8.1	<p>PROTECTION OF CULTURAL HERITAGE</p> <p>As part of the ESIA under action 1.2, conduct surface survey of locations proposed for solar power plant development for evidence of cultural heritage. If the surveys determines that cultural heritage may be encountered during ground-disturbing activities, develop and implement a Cultural Heritage Management Plan (CHMP) that is acceptable to the World Bank and is consistent with ESS8.</p>	<p>Conduct survey and, if necessary, prepare CHMP as part of ESIA under requirement 1.2 above.</p> <p>Adopt and implement CHMP throughout construction, as required by CHMP.</p>	EDL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.2	Develop and implement chance finds procedure, including training for supervisors and workers Include in construction contracts the requirement to adopt the procedure and implement it throughout construction	Develop procedure as part of ESIA under requirement 1.2 above. Include in bidding documents and contracts.	EDL
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, which includes measures to, <i>inter alia</i> provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner free of manipulation, interference, coercion, discrimination and intimidation.	Adopt the SEP disclosed on 23 August 2024 and implement throughout Project implementation, update as needed.	EDL and LRA
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. 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.	Establish and publicize within one month after the Project Effective Date, and thereafter maintain and operate throughout Project implementation period.	EDL and LRA
CAPACITY SUPPORT			
	Provide ESHS training in the relevant requirements of Lebanese law, the ESF, this ESCP, and the applicable ESMP to: (i) the Project Management Teams within LRA EDL, (ii) the EDL E&S Specialist, (iii) the LRA E&S Focal Point. E&S and OHS training shall be delivered (as appropriate) by E&S and OHS specialist and E&S and OHS consultants for all nominated staff	Within 30 days of appointment of PMT and the E&S Specialist and Focal Point.	EDL and LRA
	Provide OHS and emergency response training to Project workers in accordance with the applicable OHS Plans, including Contractors' construction-phase Plans	Within 30 days of adoption/approval of OHS and Emergency Preparedness and Response Plans.	EDL and LRA