

German Financial Cooperation with the
Republic of Lebanon

Education Programme Lebanon (School Construction)

BMZ-No.: 2018 68 629

Environmental and Social Management Framework (ESMF)

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Non-Technical Summary

The Ministry of Education and Higher Education (MEHE) will receive funding from the German Government through KfW Development Bank for the implementation of the Lebanon School Construction Programme. The Program aims to improve access to appropriate public-school infrastructure and is implemented in two phases. Phase 1 includes the construction of at least four new public schools, providing approximately 4,000 additional school places. Phase 2 includes the extension of at least four existing public schools, together with light rehabilitation works. The Program also includes furnishing and equipment for the supported schools as well as consulting services and institutional support. While the planning and site-selection process for Phase 1 has advanced, the specific schools and detailed scope of works under Phase 2 are not yet fully defined.

The construction, extension and rehabilitation of public schools are expected to generate significant positive social benefits for students, teachers, school staff, parents and the communities served by the schools. At the same time, Program activities may generate environmental and social risks and impacts during planning, construction and operation. These may include, among others, occupational and community health and safety risks; dust, noise and vibration; construction waste and wastewater; traffic and access impacts; vegetation removal; risks associated with hazardous materials; impacts on existing school activities during extension or rehabilitation works; labor and working-condition risks; and potential social impacts related to land use, school closure or transfer of students and staff.

The overall Program has been categorized as Category B in accordance with the applicable KfW Sustainability Guideline. However, each individual Program site and intervention will be screened and categorized based on its specific environmental and social risks and impacts. Eligible interventions may be categorized as B or B+. Category B interventions will undergo a simple site-specific environmental and social assessment and preparation of a site-specific Environmental and Social Management Plan (ESMP), while Category B+ interventions will require a scoped Environmental and Social Impact Assessment (ESIA), including a site-specific ESMP. Category A interventions will not be eligible for financing under the Program.

Each proposed intervention will also be screened in accordance with applicable Lebanese environmental assessment requirements. School construction and educational facilities are not explicitly listed as a specific project category in Annex 1 or Annex 2 of Decree No. 8633/2012. The required screening information will therefore be submitted to the Ministry of Environment (MoE), which will determine whether an Environmental Impact Assessment (EIA), an Initial Environmental Examination (IEE), or no further environmental assessment under Decree No. 8633/2012 is required. MoE's determination of the applicable national environmental assessment instrument does not, by itself, determine the Program's E&S risk categorization, which will be determined separately based on the site-specific risks and impacts and the applicable KfW requirements.

The Program will not finance land acquisition. New school construction will only take place on land owned by MEHE or voluntarily donated to MEHE. Any land donation will be verified to ensure that it is voluntary and free from coercion, and land ownership, current land use and potential land-related impacts will be assessed during site screening. Sites involving physical or economic displacement or other land-related impacts that are incompatible with the Program eligibility criteria will not be eligible for financing.

For each eligible intervention, appropriate measures will be identified to avoid, minimize and mitigate environmental and social risks and impacts. These measures will be incorporated into the site-specific ESMP and, as applicable, into bidding and contractual documents. Contractors will be responsible for implementing the applicable environmental, social, health and safety requirements during the works, including occupational health and safety, labor and working conditions, environmental protection, community health and safety, worker training and use of personal protective equipment. MEHE will retain overall responsibility for implementation of the ESMF, supported by the Implementation Consultant (IC), which will support screening, environmental and social assessment, preparation and supervision of ESMPs, stakeholder engagement, monitoring and reporting.

Stakeholder engagement will take place throughout Program planning and implementation. MEHE has developed a project-level Stakeholder Engagement Plan (SEP) that provides the overall framework for stakeholder identification and engagement, information disclosure, consultation, inclusion of vulnerable and disadvantaged groups, grievance management, and monitoring and reporting. The SEP will be reviewed and updated, as necessary, as additional Program sites and activities are defined. Site-specific stakeholder engagement will be undertaken in accordance with the project-level SEP and will be proportionate to the nature and scale of the proposed activities and their potential environmental and social risks and impacts.

MEHE will use its existing central Grievance Mechanism (GM), operated through its national call center, as the primary grievance channel for the Program. Complaints related to Program activities will be forwarded to MEHE's Projects and Programs Department (PPD), which will coordinate with the IC for follow-up, investigation and resolution. To improve accessibility, a dedicated grievance mobile number (+961 76 399 882) managed by the Environmental and Social Specialist of the IC is also available for calls and WhatsApp messages. Other channels include the MEHE call center (+961 1 77 28 88 / 77 22 88 / 77 22 99), written grievance forms available at the concerned municipalities, and postal submissions to MEHE headquarters. Anonymous grievances may also be submitted. The GM will be communicated through stakeholder engagement activities, municipalities, Project signage and MEHE communication channels. SEA/SH-related grievances will be handled confidentially through the appropriate safeguarding procedures.

Overall, the ESMF establishes the procedures, responsibilities and management measures required to ensure that environmental and social risks and impacts are systematically identified and

addressed throughout the Program. It provides the framework for site-specific screening and categorization, environmental and social assessment, preparation and implementation of ESMPs, stakeholder engagement, grievance management, and monitoring and reporting for both new school construction under Phase 1 and extension and rehabilitation works under Phase 2.

Table of Contents

Non-Technical Summary	2
Table of Contents	5
List of Tables	7
List of Figures	7
1 Introduction	8
1.1 Objective of the ESMF	8
1.2 Project Description	9
1.3 Risk Categorization	10
2 Legal and Administrative Framework	12
2.1 National Legal and Regulatory Framework	12
2.1.1 Environment	12
2.1.2 Lebanese ESIA Procedures	14
2.1.3 Labor and Working Conditions and Occupational Health and Safety (OHS) ILO Core Labor Standards	18
2.1.4 Land Use and Expropriation	21
2.1.5 Education, Child Protection and Refugees	24
2.2 Applicable International Standards and Guidelines	25
2.3 Gap Analysis	35
2.3.1 Gaps: ESIA Process and Stakeholder Engagement	35
2.3.2 Gaps: Labor and Working Conditions and OHS	36
2.3.3 Gaps: Land Acquisition and Resettlement	37
3 Potential Environmental and Social Impacts and their mitigation	39
3.1 Positive Impacts	39
3.2 Negative Impacts and their Mitigation	40
4 ESMF Implementation Framework	50
4.1 Involved Stakeholders and Responsibilities	50
4.1.1 The Ministry of Education and Higher Education (MEHE)	50
4.1.2 The Ministry of Environment (MoE)	50
4.1.3 The Implementation Consultant (IC)	51
4.1.4 Construction Firms (Contractors)	51
4.1.5 Municipalities and Union of Municipalities	51
4.1.6 Other Local Stakeholders	52
4.1.7 Donors	52
4.2 Implementation Procedures	53
4.2.1 Step 1: Initial Screening of sites to determine risk management approach	53
4.2.2 Step 2: Stakeholder Engagement and Information Disclosure	55
4.2.3 Step 3: Assess E&S risks and elaborate ESMPs	56
4.2.4 Step 4: Implement ESMPs	59
4.2.5 Step 5: Monitor and report on ESMP and SEP implementation	59
4.3 Grievance Mechanism	42

5	Cost Implications of the ESMF	43
6	References	45
	Annexes	46
Annex 1:	E&S Screening and Risk Categorization of the Program (based on the KfW-Screening Tool).....	47
Annex 2:	E&S Screening Tool for Individual Program Sites and Interventions (Risk Categorisation) and Interventions.....	55
	A - Project Information.....	55
	B - Stakeholder Engagement	56
	C – Site Screening Checklist.....	57
Annex 2b:	MoE Screening Form (Annex 4 of Decree 8633/2012)	66
Annex 3:	E&S Assessment Check List for Construction Sites (categorized as B).....	68
	B - Stakeholder Engagement	69
	C - Checklist.....	70
Annex 4:	ESMP Template	83
	A - Project Information.....	83
	B - Stakeholder Engagement	84
	C - Principles of Project Planning.....	85
	D - Generic ESMP Template	87
	E - Generic Operation-Phase ESMP Template	116
Annex 5:	Stakeholder Engagement Plan(s) (SEP)	119
1	Site-Specific Stakeholder Engagement Plan	121
2	Guidance for Site-Specific Stakeholder Engagement Plan	122
1.	Introduction	122
2.	Regulations and Requirements	122
3.	Summary of any previous stakeholder engagement activities	122
4.	Project Stakeholders	122
5.	Stakeholder Engagement Program.....	123
6.	Timetable	123
7.	Resources and Responsibilities.....	123
8.	Grievance Mechanism.....	124
9.	Monitoring and Reporting.....	124
Annex 6:	Glossary of ESIA Terms.....	125

List of Tables

Table 1 - Overview on World Bank Environmental and Social Standards relevant for the Program	26
Table 2 - Likely negative E&S risks under the Program and possible mitigation measures	41
Table 3 - Site-specific screening categories (A, B+, B, C)	54
Table 4 - Cost implications of the ESMF for the Program Budget	44
Table 5 - Key considerations for site-specific stakeholder engagement plan	119

List of Figures

Figure 1 – Overview of EIA Process in Lebanon	17
Figure 2 - Overview of risk screening categories (including tools to be provided under the ESMF).....	58
Figure 3 - Overview on ESIA procedures and responsibilities	60

1 Introduction

1.1 Objective of the ESMF

The objective of the Environmental and Social Management Framework (ESMF) is to provide guidance to MEHE and all involved stakeholders to identify, evaluate and manage all environmental and social risks of the Program to comply with applicable national and international laws and standards. Relevant national laws and policies come from the domains of environment, land, occupational health and safety (OHS), employment as well as child protection. Applicable international standards include the World Bank's new Environmental and Social Standards (ESS), the BMZ Guideline for Human Rights, KfW's Sustainability Policy, ILO Labor Standards, as well as other UN standards. Furthermore, the ESMF incorporates recommendations on conflict-sensitivity based on the Target Group Analysis as well as the Peace and Conflict Assessment elaborated as part of Feasibility Study (see Annex 7 and 8).

The ESMF ensures that interventions under the Project are undertaken in a manner that avoids and minimizes environmental and social impacts as much as possible. The Program comprises both the construction of new public schools under Phase 1 and the renovation of existing public schools under Phase 2. While the planning and site-selection process for Phase 1 has advanced since preparation of the original ESMF, the specific schools and scope of renovation works to be implemented under Phase 2 are not yet fully defined. The ESMF therefore continues to serve as the overarching framework for identifying, assessing and managing environmental and social risks and impacts associated with both phases of the Program. Thus, the ESMF defines principles, guidelines, procedures and responsibilities for all project phases and types of intervention (e.g. school site selection and planning, land acquisition where applicable, elaboration of school designs, renovation, construction etc.) to assess and manage E&S risks and impacts. In particular, the ESMF

- guides environmental and social impact screening and -risk categorization for each site and intervention,
- guides the elaboration of site-specific Environmental and Social Management Plans (ESMP) where required,
- defines responsibilities and procedures for the implementation of the ESMF and estimates costs,
- proposes capacity building and stakeholder engagement measures for ESMF implementation,
- provides supporting material for ESMF implementation (checklists, generic E&S Management Plan to be adapted to individual construction and renovation measures etc.).

The ESMF follows a mitigation hierarchy that consists of the following steps:

1. Anticipate and avoid risk and impacts whenever possible;
2. Where avoidance is not possible, minimize or reduce impacts to acceptable levels;
3. Once impacts and risks have been minimized or reduced, mitigate risk;
4. Where significant residual impacts remain, compensate for or off-set them, where technically and financially feasible.

1.2 Project Description

The Lebanese Ministry for Education and Higher Education (MEHE) has identified current deficits in the public-school infrastructure as one important bottleneck to improve access and quality of public education. Many years of civil war and subsequent crisis have led to unsystematic school planning and asset management, as well as insufficient infrastructure investments. As a consequence, the public-school infrastructure in Lebanon needs to be modernized and rationalised. For historic reasons, many schools in Lebanon, especially in rural areas, are of rather small size and/or operate in rented buildings that are often inadequate for schooling. These small schools mostly operate with limited financial resources and thus tend to offer lower education quality. In addition, the majority of the school buildings in Lebanon are old and in bad physical condition due to the lack of a maintenance system and of funds specifically allocated for this purpose.

Thus, MEHE, with the support of various donors, intends to improve the school infrastructure in the country by replacing inefficiently allocated and inadequate facilities where appropriate, expanding and rehabilitating existing schools, and providing modern school infrastructure in areas where additional capacity is required. These efforts are expected to increase access at all school levels, to improve drop-out and transition rates as well as to save annual rental costs, create efficiency gains and make public schools more attractive.

The KfW-financed Education Programme Lebanon (School Construction) supports MEHE in its efforts to improve and modernize the country's public-school infrastructure. The Program is implemented in two phases comprising complementary investments in new school construction and the extension and rehabilitation of existing public schools.

Phase 1 focuses on the construction of new public schools, primarily larger all-through schools offering educational cycles from Kindergarten (KG) through intermediate level and, where justified by demand, secondary level. The new schools are intended to provide additional school capacity, particularly in areas where existing public-school infrastructure is insufficient and/or where there is significant reliance on rented or otherwise inadequate school facilities. The objective of Phase 1 is the construction of at least four new public schools providing approximately 4,000 additional school places.

Since preparation of the original ESMF, the planning and site-selection process for Phase 1 has advanced. Following assessment of potential sites and application of the agreed site-selection methodology, priority locations have been identified for the new schools. Site-specific environmental and social assessment and management instruments will be prepared in accordance with this ESMF and the applicable national and KfW requirements.

Phase 2 complements the new construction activities under Phase 1 and focuses on the extension of at least four existing public schools, combined with light rehabilitation of existing school buildings, as appropriate. The works will also include adequate furnishing and equipment and associated consulting and capacity-support services. Extensions are intended to increase capacity and improve the quality and functionality of existing public-school infrastructure where this represents an appropriate and efficient response to identified educational needs. Where feasible, new schools constructed under Phase 1 and schools extended or rehabilitated under Phase 2 will

incorporate rooftop solar photovoltaic (PV) systems to reduce reliance on the national electricity grid, and rainwater harvesting systems to reduce reliance on municipal water supply and groundwater resources, subject to confirmation of technical and cost feasibility during detailed design.

While the Phase 1 site-selection process has advanced, the specific schools and detailed scope of works to be implemented under Phase 2 are not yet fully defined. The ESMF therefore provides the environmental and social framework applicable to both new construction and the extension and rehabilitation of existing schools, with site-specific screening and environmental and social assessment to be undertaken once the respective sites and scope of works are confirmed.

The target group of the Program comprises Lebanese and non-Lebanese school children aged 3–18, particularly in areas where adequate public-school infrastructure is insufficient. Additional beneficiaries are teachers, school staff as well as parents and communities. Moreover, MEHE staff at central and regional level will also benefit indirectly. A full analysis of the target group can be found in Annex 8.

1.3 Risk Categorization

A preliminary screening of possible environmental and social risks and impacts of the Program was conducted. For the screening, the KfW screening tool (see Annex 1) was used, and categorization was undertaken in accordance with the categories defined in the applicable KfW Sustainability Guideline of April 2016¹. The screening considered the information available at the time of preparation of the ESMF and the typical risks associated with new school construction, extension and rehabilitation measures. Risks and impacts will be assessed in further detail for each individual intervention through site-specific screening and assessment.

The overall Program has been categorized as a category “B” Project, which implies moderate E&S risks². In general, the Program is expected to have manageable adverse impacts and risks that are limited to the construction sites and that can be reversed and/or reduced or mitigated by measures and standard technological solutions available. However, there might be social risks and impacts related to the change in land use and occupational and community health and safety, which have to be assessed systematically for each site. Even if land acquisition is not financed by the Program, it has to be ensured that any land donations have been or will be voluntary and that the Program will not require any significant resettlements. Thus, the Program is categorized as a category B Project and will require the elaboration, implementation, and monitoring of site-specific ESMPs. In addition, each intervention will be subject to the applicable Lebanese environmental assessment requirements. Depending on the nature and scope of the proposed intervention and the determination of the Ministry of Environment, an Initial Environmental Examination (IEE) may be required.

MEHE will conduct an individual screening for each selected site and intervention to determine its

¹ https://www.kfw-entwicklungsbank.de/PDF/Download-Center/PDF-Dokumente-Richtlinien/Nachhaltigkeitsrichtlinie_EN.pdf

² KfW categories comprise: A (high E&S risks), B+ (relevant E&S risks), B (moderate E&S risks) and C (low E&S risks). For further information see table? under chapter 5.2.1

eligibility, site-specific risk categorization, and applicable environmental and social assessment requirements. The current risk categorization of the Program is based on likely risks and impacts associated with the new construction, extension and rehabilitation measures envisaged under the Program. Individual interventions are expected to generally fall within Category B; however, the final categorization will be determined at site level, taking into consideration the characteristics and context of each site, the nature and scope of the proposed works, and the associated environmental and social risks and impacts.

2 Legal and Administrative Framework

The following laws, standards and guidelines will be applicable for implementation of the Program measures under the ESMF. This serves to ensure that potentially negative environmental and social risks and impacts stemming from Project activities are avoided, reduced or mitigated, and in order to strive to enhance benefits for local communities in the Project Area:

- All Government of Lebanon laws and regulations, particularly those in the area of environment, labor, occupational health and safety, land tenure and expropriation, child protection etc.;
- International Law including conventions and treaties adopted by the Government of Lebanon applicable to the Project;
- Sustainability Guidelines of the KfW Development Bank³ and therewith:
 - World Bank Environmental and Social Policies according to the new Environmental and Social Framework valid since October 2018⁴
 - General (and Sector Specific) Environmental, Health and Safety (EHS) Guidelines of the World Bank Group,⁵
 - Guidelines on Incorporating Human Rights Standards and Principles, Including Gender, in Program Proposals for Bilateral German Technical and Financial Cooperation⁶;
 - The Fundamental Conventions of the International Labor Organization (ILO) as well as IFC Performance Standard 2 on Labor and Working Conditions;
 - In case of land acquisition: FAO Voluntary Guideline on the Responsible Governance of Land, Fisheries and Forests;
 - Basic Principles and Guidelines on Development-based Evictions and Displacement (namely §§ 42, 49, 52, 54 and 60)⁷ and guidance provided.

Chapter 2.1. describes the national legal and regulatory framework regarding environment, labour, land tenure, cultural heritage, education and child protection and refugees. Chapter 2.2. gives an overview on the international standards and guidelines applicable under the Program. Finally, Chapter 2.3 identifies the areas where gaps between the national and international

2.1 National Legal and Regulatory Framework

2.1.1 Environment

Environmental Law 444/2002 on Environmental Protection

Approved by parliament in 2002, the law is an overarching legal instrument for environmental protection and management. It includes all the principles of the Rio Declaration on Environment and Development (1992) and defines the following 11 environmental principles:

³ https://www.kfw-entwicklungsbank.de/PDF/Download-Center/PDF-Dokumente-Richtlinien/Na-chhaltigkeitsrichtlinie_EN.pdf

⁴ <http://www.worldbank.org/en/projects-operations/environmental-and-social-policies>

⁵ <https://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final+-+Gen-eral+EHS+Guidelines.pdf?MOD=AJPERES>

⁶ http://www.bmz.de/en/zentrales_downloadarchiv/themen_und_schwerpunkte/menschen-rechte/Leitfaden_PV_2013_en.pdf

⁷ https://www.ohchr.org/Documents/Issues/Housing/Guidelines_en.pdf

1. Precaution (cleaner production techniques)
2. Prevention (best available technologies)
3. Polluter-Pays-Principle (polluters pay for pollution prevention and control)
4. Biodiversity conservation (in all economic activities)
5. Prevention of natural resources degradation
6. Public participation (free access to information and disclosure)
7. Cooperation between central government, local authorities, and citizens
8. Recognition of local mores and customs in rural areas
9. Environmental monitoring (pollution sources and pollution abatement systems)
10. Economic incentives to encourage compliance and pollution control
11. EIA process to control and mitigate environmental degradation

Section IV, article 21 of law 444/2002 states that “the concerned authorities in both public and private sectors should prepare the initial environmental studies (IEE studies) or environmental impact assessment (EIA) for projects that could threaten the environment, because of its size or nature or effect or activities.”.

Law 444/2002, however, does not provide details on procedural requirements and processes for Environmental Impact Assessment Procedures (EIA) in Lebanon. This is done by different national regulations, of which the following are of special importance:⁸

Environmental Decree 8633/2012: Fundamentals of Environmental Impact Assessment (EIA)

“The EIA decree” details out the requirements and procedures for ESIA in Lebanon. Projects mentioned in its annexes have to either undergo an Environmental Impact Assessment (EIA) or an Initial Environmental Examination (IEE) and have, on this basis, to be approved by the Ministry of Environment. An IEE is a preliminary study to capture potential environmental impacts of a project to determine whether conducting a deeper EIA is necessary (Article 2).

The decree describes the process required for preparing an EIA or an IEE and the timeline for responses and approvals from the Ministry of Environment (MoE). The law and the decree assign full authority to the Lebanese Ministry of Environment (MoE) through its Service of Environmental Technology Department to conduct the screening, review, control and follow up on the EIA process and its implementation.

The environmental assessment requirements applicable to individual Program interventions will be determined through the screening procedure established under Decree No. 8633/2012.

School construction and educational facilities are not explicitly listed as a specific project category in either Annex 1 or Annex 2 of the Decree. Accordingly, the applicable national environmental assessment requirement for the proposed school interventions will be confirmed through

⁸ Laws are passed by the Lebanese Parliament. The Council of Ministers or deputies can propose a project of law that should pass through the appropriate parliamentary committee. The committee reviews, assesses, and presents the law for final approval by the parliament. Decrees are issued by the Council of Ministers. Decrees have power of law provided that they do not contradict existing law.

consultation with and screening/classification by the Ministry of Environment (MoE), in accordance with Decree No. 8633/2012. Depending on the nature, scale and location of the intervention and the determination of MoE, an Initial Environmental Examination (IEE), an Environmental Impact Assessment (EIA), or no further environmental assessment under the Decree may be required. In all cases, the site-specific environmental and social assessment and management requirements established under this ESMF, including preparation of a site-specific ESMP, will apply.

Decree no. 8213/2012: Strategic Environmental Assessment (SEA) of policy, plan and program proposals in the public sector

The Decree was the first enacted Decree in the Middle East and North Africa Region to incorporate the environmental considerations at the early stage of the decision-making process of policies, plans and programs. The SEA is a planning and management method for combating or, at minimum, reducing sources of pollution and degradation of natural resources by ways of assessing environmental impacts of policy, program, study, investment or organization proposals identifying necessary mitigation measures and enhancing positive outcomes on the environment and natural resources, prior to their acceptance or refusal (Article 2).

Decree no. 8471/2012 Environmental Compliance of Establishments

The decree regulates all activities that may cause harmful pollution and environmental degradation.

2.1.2 Lebanese ESIA Procedures

The essential elements of the Lebanese EIA procedures mainly specified in Decree 8633/2012 are the following:⁹

Step 1: Environmental Screening by Lebanese MoE

The Project proponent completes a Project Screening Form of the intended project in accordance with Annex 4 of the EIA decree and submits it to the Ministry of the Environment (MoE) for screening (see Annex 2b). In principle, all projects have to go through this screening process.

Screening is made through the Service of Environmental Technology of MoE based on significance/severity of impacts determined as a function of impacts magnitude, type, nature, extent, timing, duration, likelihood and reversibility as per the EIA Decree. The service determines if the project is among:

1. Annex I projects for which an Environmental Impact Assessment (EIA) report is required
2. Annex II projects for which an Initial Environment Examination (IEE) is only required
3. No further Environment Analysis is required.

Projects located in environmentally sensitive areas (Annex III) may require an EIA or an IEE independently from their listing in one of the Annexes. Environmentally sensitive areas are: (1) areas classified as protected areas by law, areas that are home of endangered species (animal and plants) as well as watersheds, sea beaches, river waterways and springs as well as public land. Thus, an Annex II projects located in an Annex III location would require an EIA, and a project not

⁹ World bank, 2016a.

listed in Annex I or II but located in an Annex III area would require an IEE. The Minister of Environment has the right, and based on a reasonable justification, to request an IEE or an EIA regard-less of the classification of the project. Duration of the MOE response is 15 working days.

This screening step will be required for the individual new construction, extension and rehabilitation interventions under the Program. Based on the information submitted through the screening process, MoE will determine the applicable national environmental assessment requirements, including whether an IEE or an EIA or no further environmental assessment is required.

Step 2: Scoping

Scoping is required only for projects in Annex I (as a basis for the EIA report) but not for Annex II projects (IEE reports). It defines the areas and level of detail the EIA study has to cover and usually has to take place in the pre-feasibility phase of a planned project. The information to be covered in the scoping is specified in Annex 7 of Decree 8633/2012.

The scoping starts by the proponent informing stakeholders listed in Annex 5 of Decree 8633/2012 about the upcoming ESIA. The concerned municipality is responsible to announce that the public can submit written comments, while the proponent organizes public hearing sessions. The comments collected from stakeholders and the public must be taken into account during the assessment phase and must be presented in the scoping report. MoE has to respond within 15 working days after submitting the scoping report. If it fails to do so, the project owner can proceed with preparing the ESIA, in line with the EIA decree.

Step 3: Impact Assessment or Initial Environmental Examination/Report (EIA or IEE)

Where required and based on the screening and classification by MoE, an EIA or an IEE are commonly conducted during the feasibility and design phase of the planned project.

The content of an EIA report is specified in Annex 8 and that of an IEE in Annex 6 of the EIA decree.

In case of an EIA, the project proponent is required to inform the stakeholders, concerned ministries and NGOs of the preparation of the respective report. The concerned municipality is obligated to post an announcement regarding this issue on its bulletin board during 18 working days and to request comments from the public (article 7, section 30). Comments from the public or stakeholders can also be submitted to MoE during 25 working days (article 7, section 4). The project proponent is required to submit a report on any consultations and meetings with stakeholders (article 7, section 5).

The report has to assess all risks (in case of an EIA defined in the scoping and in case of an IEE defined by the prior screening) and has to detail out necessary mitigation measures, which are commonly summarized in an Environmental Management Plan (EMP) as part of the report. The reports are available for consultation at the MOE by the public or by the concerned institutions (article 7, section 9).

Step 4: Technical Evaluation by MoE

A technical committee comprised of 3 to 5 members of various background and expertise from

different services of the MOE is responsible for the review of the SEA, EIA and IEE studies. If needed, experts not available at the MOE can be subcontracted to assist with the review of the EIA studies.

The technical committee uses the methodology “MNA Guide for the Preparation and Review of EA reports of the World Bank”. It is based on ‘Review Checklists’ with corresponding scores (A-F). A total score of “C” is considered to be satisfactory despite omissions and/or adequacies.

Step 5: Approval of the EIA or IEE reports

The Minister of Environment reviews the technical committee’s report and notifies its decision to the Proponent and publishes it within 2 months (in case of an EIA) or 30 working days (in case of an IEE). This decision is transmitted to the concerned institutions and should be published on the municipality bulletin board during 12 working days.

In case of an IEE, the proponent may be required to conduct an ESIA study, if significant impacts on the environment or impacts on sensitive areas and ecosystems are expected. Otherwise, EIA or IEE reports can receive conditional or unconditional approvals or rejection. In MoE approvals for EIA and IEE are valid for 2 years.

In case of conditional acceptance or rejection, objections and complaints from the proponent can be submitted to the MOE within 12 working days from the announcement of its decision and a reply should be provided within 12 working days from receiving the complaints. In case the objection is related to a public or private project that has been approved without it being subject to an EIA or an IEE although it requires such a study, article 77 of the Council of State by laws applies. In case the objection is from a public authority against MOE decisions of screening, scoping and approval, the COM will decide.

Section 12 of the EIA regulations states that the EIA and IEE are available for examination at the MOE.

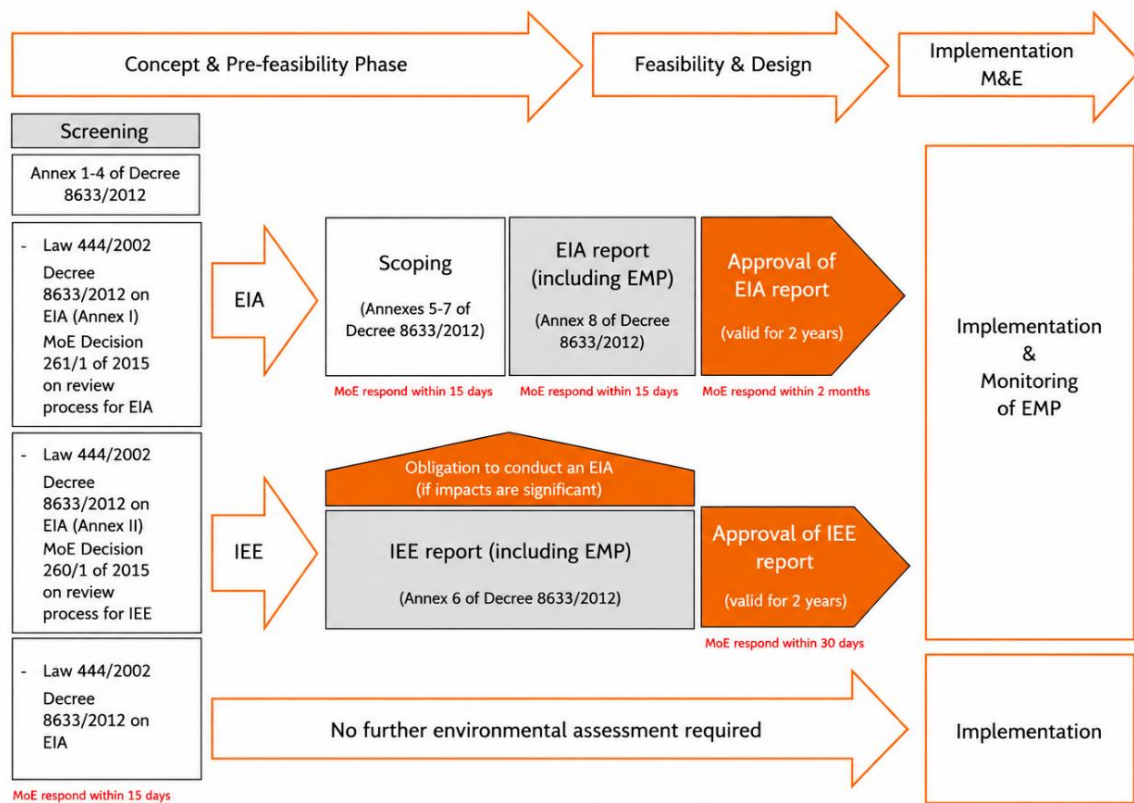
Step 6: Implementation and Monitoring & Evaluation of Environmental Management Plan

Compliance to the environmental management plan specified with the ESIA is monitored through site inspections by the MoE and through periodic reports submitted to the MoE, as agreed with the proponent. Site inspections are done according to a schedule and additionally when the MoE receives a complaint about a specific project.

The Environmental Protection (Law 444/2002, Article 58) states that proponents shall be punished by a fine or imprisonment in case a project starts without conducting the required ESIA or IEE, or when a project is not in line with the approved ESIA/IEE. In case of non-compliance, the proponent will be given a time frame to comply with the requirements or agreed conditions. If non-compliance persists, the MoE asks the relevant ministries to close down the project or to revoke the permit given to the project. The MoE also has the right to sue the project owner at environmental law courts and to enforce the polluter pays principal as stipulated in law 444.

The figure below gives an overview of the EIA procedures in Lebanon depending on the initial categorization of the Project by MoE.

Figure 1 – Overview of EIA Process in Lebanon



Source: joyn-coop based on MoE 2017

Following environmental decisions and circulars regulate further environmental aspects, which might be relevant under this Program:

Environmental Decisions

- MoE Decision 588/1 of 2015: Requirements for consultancy firms that perform environmental studies: The decision determines that the preparation of all kind of ESIA reports, and all other environmental studies, is restricted to a list of private consultancies qualified and registered as environmental consultants at the Council for Development and Reconstruction (CDR). These national consultancies can conduct environmental studies in collaboration with an international consultancy.
- MoE Decision 52/1 of 1996: National environmental quality standards: All development projects, regardless of EIA classification, must adhere the environment quality standards for air, water and soil.
- MoE Decision 8/1 of 2001: National emission standards: All development projects, regardless of EIA classification, must adhere to as well as air emission standards and wastewater discharge.
- MoE Decision 260/1 of 2015: Review process for IEE reports
- MoE Decision 261/1 of 2015: Review process for EIA scoping and EIA reports

- MoE Decision 262/1 of 2015: Objection mechanism for MoE's decisions regarding EIA reports
- MoE Decision 539/1 of 2015: Determining deadlines for applying to obtain a certificate of Environmental Compliance for industrial establishments
- MoE Decision 540/1 of 2015: Determining deadlines for applying to obtain a certificate of Environmental Compliance for classified establishments (non-industrial)

Environmental Circulars

Following circulars detail out requirements to comply with during the EIA process:

- MoE Circular 9/1 of 2014: Reminder to attach planning and classification certificates and other legal documents to the EIA and IEE reports
- MoE Circular 6/1 of 2015: Required fees for EIA and IEE, value of guarantee and its return
- MoE Circular 10/1 of 2016: To the proponents of all public and private projects subject to the provisions of Decree 8633/2012 (EIA)

2.1.3 Labor and Working Conditions and Occupational Health and Safety (OHS) ILO

Core Labor Standards¹⁰

Lebanon has ratified in total 51 of the ILO conventions (for an overview of the core conventions see chapter 4.3). Of these 42 are in force and 9 have been denounced or abrogated. Under the ratified ones are the following seven (of the eight) ILO core conventions:

- No. 98 on the right to organize and collective bargaining,
- No. 29 and 105 on forced labor,
- No. 138 on minimum age,
- No. 182 on worst forms of child labor,
- No. 100 and 111 on equal remuneration on discrimination.

Further following important Conventions have been ratified:

- No. 81 and 150 on Labor Inspection and Administration.
- No. 100 on Equal Remuneration and No. 111 on Discrimination (Employment and Occupation) regarding equality of opportunity and treatment

However, following Conventions have not been ratified:

- The first Core Convention No. 87 on freedom of association and protection of the right to organize
- No. 129 on Labor Inspection in the Agriculture Sector,
- No. 155 on Occupational Health and Safety

¹⁰ ILO, 2010a

Ratified Conventions in the field of Occupational Health and Safety (OHS) are:

- No. 45 Underground work,
- No. 115 Radiation Protection,
- No. 120, Hygiene for Commerce and Offices,
- No. 127 Maximum Weight Convention
- No. 136 for Benzene,
- No. 139 for Occupational Cancer,
- No. 148 Working Environment (Air, Noise and vibration),
- No. 170 Chemicals,
- No. 174 Major Industrial Accidents, and
- No. 176 Safety and Health in Mines.

Lebanese Labor Law of 1962

The Lebanese Labor Law of 1946 and its amendments in particular 1962 (law 17th September) are the main source for labor legislation in Lebanon. This law is applicable to all workers and employers except domestic workers, agricultural workers, enterprises limited to family members and public servants. It comprises the branches of construction and services but does not apply to agricultural unions.

Decree No. 8987 on Worst Forms of Child Labor

Action against child labor in Lebanon officially started at the national level in 2000. Soon after Lebanon ratified the ILO Convention No. 182 (on Worst Forms of Child Labor) in 2001 and No.138 (on Minimum Age for Employment) in 2003, several projects followed in order to fulfill Conventions' Requirements at least partially. Furthermore, a National strategy Against Child Labor was developed and endorsed by Council of Ministers in 2005.

The Lebanese government issued the Decree 8987 in 2012¹¹ (prohibition of employment of minors under the age of 18 in works that may harm their health, safety or morals) regulating the conditions under which minors under 18 are allowed to work. This decree prohibits

- to employ any adolescents under the age of thirteen.
- to employ any adolescent under the age of sixteen in jobs of a dangerous nature or which represent a threat to life, health or public morals because of the circumstances in which they are carried out.
- to set adolescents under the age of 18 to work more than six hours a day, with a break of at least one hour if the daily working period exceeds four consecutive hours.
- The decree contains a list of the most hazardous occupations and their related environmental risks, which also defines the jobs that cannot be carried out by adolescents under the age of 16.

¹¹ GoL, 2012.

In 2013, the GoL adopted the National Action Plan for the Elimination of the Worst Forms of Child Labor, which defines 11 strategic priorities to combat the worst forms of child labor in Lebanon by 2016 (in concordance with the Global Hague Conference on Child Labor).

Decree No. 3273 of 26 June 2000 on Labor Inspection

According to Article 1 of Decree No. 3273, the labor inspection system ensures the supervision of compliance with regulations regarding conditions of employment, protection of workers including OHS.

Labor inspection is the responsibility of the Department of Labor Inspection, Prevention and Safety (DLIPS), which is under the Relations Authority Department of the Ministry of Labor (MoL). As assessed by an ILO audit in 2010, the number of routine inspection visits conducted at the national levels have been estimated at a low level of around 2% of the enterprises operating in the country and at about 21% of the labor force per year. About 75% of the inspection visits assessed resulted in issuing warning letters and less than 0.5% of them result in penalizing the employers and imposing fines.¹²

Decrees related to Occupational Health and Safety (OHS)¹³

There are several decrees under the Labor Law of Lebanon, which regulate OHS issues. These are mainly the following:

- **Decree No. 11802 of 2004 (Occupational Prevention, Safety and Health):** This decree is the most important reference in OSH legislation in Lebanon. It provides methods for managing different risks including protective equipment and tools, precautionary measures, and the training of workers in their workplaces. It has the following content:
 - **Prevention and safety measures:** for operating machines, fire protection, equipment under pressure, measures to protect workers against noise, vibration and radiation, signalization, load etc.)
 - **Hygiene:** Waste Disposal, Sanitary facilities, drinking water, first aid equipment, medical examinations etc.
 - **Chemical Substances:** Safety measures when handling of chemical substances
 - **Annex 1:** thresholds for noise intensity and maximum time of exposure
 - **Annex 2:** maximum thresholds for annual dose of radiation
 - **Annex 3:** Maximum weight to be carried/pushed/pulled by women and children
- **Decree No. 136 of 1983 (OHS, Employment Accident and Occupational Disease Benefit):** regulating work-related injuries and emergencies. This decree stipulates the employers' responsibilities in cases of *occupational* injuries and corresponding compensation and workers' entitlements. The Decree No. 136 also stipulates the sanctions in case of violations.
- **The Decree No. 11958 of 2004: on the Protection, Prevention and Safety in Construction Works.** It

¹² ILO, 2010b.

¹³ ILO, 2010b.

specifies the employer's responsibility to provide proper first aid kits and trained *personnel*, and to provide the arrangements to ensure the transfer of injured personnel to health care facilities in case of need; A safe means of access to all workplaces shall be provided, maintained in safe conditions and indicated with proper signage; All hazardous materials shall be provided with warning signs and the data sheets indicating their characteristics and instructions for use and storage; and the employer shall provide clean drinking water in the site or within a walking distance.

- Decree No. 4568 of 1960: *Health care in Enterprises*. The decree obliges enterprises with more than 20 workers to have an occupational physician. The occupational physician shall take on the role of the OSH officer and shall ensure that precautionary measures are adopted, and that conditions for occupational safety and health are guaranteed.
- Decree No. 14229 of 2005: *Occupational Diseases' List*.
- Decree No. 129/2 of 17 February 2001: *Regulation of OHS labor inspection in private establishments*.

Decision No. 17561/1964 and Decision 29/1 of 2018 on Preference on Nationals

Decree no. 17561 (September 1964, Appendix II) regulates foreign labor in Lebanon. It adopts three principles restricting foreigners' right to work in Lebanon. The Lebanese government adopts the principle of preference of nationals based on a list of professions reserved only to Lebanese, usually updated on an annual basis (for example: Decision no. 1/29 of 2018). This means that in fact syndicated professions (e.g. in law, medicine, engineering or pharmacy sectors) are excluded for foreign labor, whereas manual and clerical jobs remain freely accessible. In fact, Syrians are constrained to work in three sectors: construction, agriculture, and 'environment'.¹⁴

2.1.4 Land Use and Expropriation¹⁵

This chapter gives an overview Lebanese land related legislation. Legislation on expropriation is also considered for comprehensiveness, although only land in MEHE ownership or voluntarily donated to MEHE will be eligible under the Program.

Decree 2366/2009 on Land Use¹⁶

According to Article 1 of Decree No. 2366/2009, the National Physical Master Plan for the Lebanese Territory (NPMPLT) constitutes the general regulatory framework for urban planning and land use in Lebanon. Article 2 of the Decree states that ministries, departments, public institutions, independent parties, municipalities and federations of municipalities are obliged to adopt directives that are consistent with the NPMPLT in every matter related to land use and regulation. The Decree classifies Lebanese lands in accordance with the following categories:

- U: Urban areas

¹⁴ The allowance for Syrians to work in construction was clarified by clarification letter of March 21, 2018 regarding Decision 29/1

¹⁵ World bank, 2016a.

¹⁶ CDR, 2017.

- R: Rural areas
- A: National agricultural areas
- N: National natural areas, distributed as follows:
 - 1N: High Mountainous areas
 - 2N: The Lebanese cedar line and the mountainous orchards
 - 3N: Areas connecting wooded lands, valleys and other natural areas

The Decree identifies the following unique sites:

- P: Major landscape
- S: Historic, archaeological and natural sites distributed as follows:
 - 1S: Classified archaeological sites; and
 - 2S: Classified natural sites.

Areas prone to natural hazards are referred to as follows:

- F: *Areas prone to flooding*
- G: *Areas exposed to the dangers of soil erosion and landslides*
- W: Areas at risk of groundwater contamination

Land Tenure Legislation¹⁷

In Lebanon there is generally little contestation over ownership, legal rights or boundaries of land because plots are generally well surveyed, and title is recorded at an administrative service based in the Ministry of Finance (with the exception of areas affected by uncontrolled movement and settlement due to the civil war). The survey unit also maintains cadastral maps that are regularly updated. Since land ownership is recorded in shares, along with all those who ever held title to it, the exact value of any transaction for an individual owner can be determined. In addition, land laws in Lebanon are gender neutral.

Expropriation Law No. 58 dated 29/05/1991 (amended 8/12/2006)

Expropriation Law No. 58 dated 29/05/1991, amended on 08/12/2006 and the Tenancy Law of year 1991 define the processes of land acquisition and involuntary resettlement in Lebanon.

The Lebanese Constitution guards and protects the right of private property including landed property and the rights associated with it. The exercise of eminent domain, in Lebanon, for expropriating private property in the public interest, is governed by this Law. This Law is comprehensive and governs many cases.

The State may only expropriate land rights when it is to be declared in the public interest, and against payment of a prior and equitable compensation “indemnité equitable”. All compensation is a financial award through legal assessment and the process of expropriation itself cannot be halted unless the validity of the public interest decree itself is challenged. The Expropriation Law

¹⁷ World bank, 2016b

establishes general provisions for prior compensation of expropriated assets, and easement fees for other restrictions imposed on property. The mode of payment when compensating for acquisition of land will in practice be in several phases, but no defined time lag exists between taking over of land and final payment.

Compensation is determined by the Expropriation Commission set up by a decree according to proposals from the relevant ministers. The decisions of the Preliminary Commission may be appealed to the Appeals Commission by the MEHE or the individual property owner and the appellant must be represented by a lawyer.

Regarding compensation, the Lebanese Expropriation Commission determines compensation based on prevailing local market rates. Every factor that affects its value is taken into consideration, and transition costs are accounted for. Indemnities however are paid after the Take-over Decision is signed by the Head of the Expropriating Administration, and take-over can be executed within 15 days of the date of Notification for vacant lands and within 30 days for lands and buildings. Nevertheless, indemnification money is placed and secured in an account before the take-over decision is signed and concerned parties are informed that they can cash their indemnities. Also, concerned parties have the right to appeal should they not be satisfied with the compensation amount.

Tenancy/Rent Law of 1991

The tenancy / rent law was enacted in 1991 and gives the land owner the right to retrieve the property at the end of the contract. Where expropriation causes loss of tenancy, expropriation commissions divide their awards between landlords and tenants according to the economic value of the tenancy, enabling tenants to secure alternative housing by rental or down-payment for the purchase of a housing alternative.

Antiquities law of 1933

According to the Antiquities Law of 1933, historic monuments can be either publicly or privately owned. Although archaeological finds are considered state property, the parcels on which archaeological discoveries are made can remain the property of private individuals or institutions. Under this law, private property owners of listed historical buildings are responsible for the repair and maintenance of the structure. The discovery of important archaeological remains could also lead to the expropriation of private property or to limitations on its use. If a building is placed on the list of classified monuments, the owner receives no compensation for the freezing of development rights. However, if the listing is erroneous, the owner may be compensated.

Maritime Public Domain Law

Lebanese Law provides that the entire intertidal shore is public domain. This law has not been fully enforced. If a certain number of semi-permanent informal business structures have been erected, the owners will be assisted to relocate their businesses outside the Right of Way.

Cultural Heritage Law No. 37/2008

The Directorate General of Antiquities (DGA) is the technical unit of the Ministry of Culture (MoC)

that is responsible for the protection, promotion and excavation activities in all sites of national heritage in Lebanon. Law No. 35/2008 defines the organization and mandates of the MoC.

Law No. 37/2008 defines and regulates the protection and management of cultural properties. Other legislative texts which may be relevant to the scope of construction works are:

- **Decree No. 3058/2016 on the integration of immovable heritage in private and public buildings and properties** lays down the different procedures and conditions for in-situ integration and for re-integration of antiquities found when performing excavation activities.
- **Decree No. 3057/2016** defines and regulates the procedures followed by the DGA in preventive and rescue excavations.
- **Decree in force No. 1057/2007** on the protection of traditional buildings and incentives for owners of these buildings that would discourage their demolition.
- **COM Decree No. 14/1988** considers the illicit trafficking in antiquities or cultural properties a minor crime or a Misdemeanor and not a felony or a major crime. The sanctions range between 9 months to 3 years of imprisonment in addition to a fiscal penalty.
- **Decision No. 225/1934** establishes a system for penalizing violations related to laws on ancient monuments and ruins and historical buildings. Article 1 sets the fiscal penalties. Article 2 states that if an archaeological object is seized and confiscated for the benefit of the Lebanese Government, the finder may be rewarded. Article 3 states that the reward shall be equally divided between informants and guardians.
- **Law issued by Decision no. 166/1933** sets the regulations for the preservation of antiquities, excavations and trade in antiquities. This decision deals, through its various articles, with the way of licensing, the use of property and ancient monuments while assuring their protection and their conservation.

2.1.5 Education, Child Protection and Refugees¹⁸

Lebanese Law 422 of 2002 regarding legal child protection

Law 422 (2002) entitles a child to legal protection if threatened or at risk, which is defined as: A child in a situation that exposes him/her to exploitation, or threatens his/her health, safety, morals, or upbringing; A child exposed to sexual abuse or physical violence that exceeds non-harmful, culturally acceptable disciplinary beating.

Art. 41, Decision no. 1130/2001 on Child Protection and Rights

Article 41, Decision 1130 refers to the code of conduct that education professionals must adhere prohibited to inflict any physical punishment on pupils, nor to address verbal retribution that is “humiliating and is against the principle of education and personal dignity”. The law however does not spell out what the student’s rights are nor what are the precise accountabilities of teachers.

¹⁸ World bank, 2016a.

Law No. 220/2000 and decree 7194/2011 Equal Rights and Inclusion of Disabled

Law No. 220/2000 guarantees Persons with Disabilities (PwDs) equal rights as any other citizen and its application Decree No. 7194/2011 details the provisions that should be made to include the disabled in all facets of social and public life.¹⁹

UN Convention on Refugees

Lebanon has not signed the 1951 Refugee Convention, although it has signed most other human rights treaties relevant to the protection of refugees. Thus, refugees are officially considered to be “displaced persons”. Constitutionally, the international treaties take precedence over domestic law, but this is rarely observed by the courts, and there is no domestic legislation or administrative practice to address the specific needs of refugees and asylum-seekers. On the other hand, the GoL maintains its borders open to the influx of refugees and allowed Syrians to access the education and health systems.

2.2 Applicable International Standards and Guidelines**World Bank Environmental and Social Standards (ESS)**

The ten Environmental and Social Standards (ESS) listed below are an essential element of the new Environmental and Social Framework (ESMF) of the World Bank to be applied to all WB investment projects since October 1, 2018.²⁰ The ten ESS substitute the previously used World Bank Safeguards. Since January 1, 2019, the new World Bank ESS also have to be applied under the KfW sustainability guidelines. The table below gives an overview, which of the ESS are assessed as relevant for the Program (triggered):

¹⁹ CDR, 2017.

²⁰ <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>

Table 1 - Overview on World Bank Environmental and Social Standards relevant for the Program

Environmental and Social Standards (ESS):	Triggered?	Explanation
ESS1: Assessment and Management of Environmental and Social Risks and Impacts		
ESS1 sets out the Project-Executing Agencies responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs). Objective of ESS1 is to: • adopt a mitigation hierarchy approach (anticipate and avoid, then minimize or reduce, then mitigate, then compensate or off-set residual impacts) • adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project. • utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate. • promote improved environmental and social performance, in ways which recognize and enhance the Project-Executing Agencies capacity.	Yes	Environmental and social risks and impacts associated with new school construction, extension and rehabilitation will be assessed and managed in accordance with this ESMF, the applicable KfW requirements and the relevant Lebanese environmental assessment requirements. Site-specific screening will determine the environmental and social assessment and management measures required for each intervention.

Environmental and Social Standards (ESS):	Triggered?	Explanation
ESS2: Labor and working conditions		
Objective of ESS2 is to: • promote safety and health at work. • promote the fair treatment, non-discrimination and equal opportunity of project workers. • protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. • prevent the use of all forms of forced labor and child labor. • support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. • provide project workers with accessible means to raise workplace concerns	Yes	Private firms will be contracted for design & supervision services and for construction, extension and rehabilitation works. Applicable labor and working-condition requirements under ESS2 will be incorporated into the relevant contracts and applied to Project workers
ESS3: Resource Efficiency and Pollution Prevention and Management		
Objective of ESS3 is to: • promote the sustainable use of resources, including energy, water and raw materials. • To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. • avoid or minimize project-related emissions of short and long-lived climate pollutants. • avoid or minimize generation of hazardous and non-hazardous waste. • minimize and manage the risks and impacts associated with pesticide use.	Yes	Resource efficiency and pollution prevention requirements are relevant during construction, extension and rehabilitation works, including in relation to energy and water use, construction and demolition waste, hazardous materials and waste, dust, noise and wastewater. Resource efficiency and waste management considerations are also relevant during school operation.

Environmental and Social Standards (ESS):	Triggered?	Explanation
ESS4: Community Health and Safety		
Objective of ESS4 is to: - anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life -cycle from both routine and non-routine circumstances. - promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams. - avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. - have in place effective measures to address emergency events. - ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.	Yes	Community health and safety risks may arise from new construction, extension and rehabilitation activities. For works at existing schools, particular attention is required where construction activities take place within or adjacent to occupied school premises, due to potential risks to students, teachers, school staff, parents and other users, including risks related to site access, construction traffic, noise, dust, hazardous work areas and emergency situations.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement		
ESS5 recognizes that project-related land acquisition and restrictions on land use have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. Thus, ESS5 has the objective to: - avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives. - avoid forced eviction. - mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in	Yes	New school construction under Phase 1 will only take place on land owned by MEHE or voluntarily donated to MEHE. Extension and rehabilitation works under Phase 2 are expected to take place within existing school properties. For each site, land ownership and any land donation shall be verified, including that any donation has occurred without coercion, and that adverse social and economic impacts due to changes or restrictions in land use are avoided or minimized.

Environmental and Social Standards (ESS):	Triggered?	Explanation
real terms, to pre- displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. • improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure. • conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant. • ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected		
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources		
Objective of ESS6 is to: • protect and conserve biodiversity and habitats. • apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. • promote the sustainable management of living natural resources. • support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.	Yes	Construction, extension or rehabilitation work in protected areas will not be eligible under the Project. In addition, adverse direct and/or indirect impacts on valuable biodiversity and habitats resulting from land-use changes and/or Project activities shall be avoided or minimized in accordance with the mitigation hierarchy.
ESS7: Indigenous Peoples		
ESS7 ensures that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.	No	This standard is not triggered because the project areas do not have any known indigenous people.

Environmental and Social Standards (ESS):	Triggered?	Explanation
ESS8: Cultural Heritage		
Objective of ESS8 is to: • protect cultural heritage from adverse impacts of project activities and support its preservation. • address cultural heritage as an integral aspect of sustainable development. • promote meaningful consultation with stakeholders regarding cultural heritage. • promote the equitable sharing of benefits from the use of cultural heritage.	Yes	Program Interventions will not take place in known cultural heritage sites. Potential impacts on known cultural heritage will be assessed during site-specific screening and assessment. A Chance Finds Procedure will apply to construction, extension and rehabilitation works involving excavation or other ground-disturbing activities.
ESS9: Financial Intermediaries		
ESS9 has the objective to: • set out how the FI will assess and manage environmental and social risks and impacts associated with the subprojects it finances. • promote good environmental and social management practices in the subprojects the FI finances. • promote good environmental and sound human resources management within the FI.	No	This standard is not triggered because no financial intermediaries are in-volved in the Project.

Environmental and Social Standards (ESS):	Triggered?	Explanation
ESS10: Stakeholder Engagement		
This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Objective of ESS10 is to: • identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. • assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design • promote and provide means for effective and inclusive engagement with project- affected parties throughout the project life -cycle on issues that could potentially affect them. • ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. • provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.	Yes	Relevant stakeholders include municipalities, local communities, students, parents, teachers, school staff, neighbouring residents and businesses, relevant public authorities, and other institutions involved in the planning and implementation of the Program. Stakeholder engagement is relevant throughout the Project cycle, including site selection and planning, design, construction, extension and rehabilitation, and operation. Particular consideration will be given to stakeholders potentially affected by works undertaken at or adjacent to existing schools

World Bank EHS Guidelines

The World Bank EHS Guidelines contain information on cross-cutting environmental, health and safety issues potentially applicable to all industry sectors. They specify guidelines and benchmarks in the area of environment, occupational health and safety, community health as well as construction and decommissioning. No industry- or sector-specific EHS Guidelines apply specifically to school construction, extension or rehabilitation activities under the Program.

The EHS guidelines contain technical references and benchmarks for following areas:

- 1) Environment
 - Air Emissions and Ambient Air Quality
 - Energy Conservation
 - Waste Water and Ambient Water Quality
 - Water Conservation
 - Hazardous Materials Management
- 2) Occupational Health and Safety
 - Facility Design and Operation
 - Communication and Training
 - Physical, Chemical, Biological and Radiological Hazards
 - Personal Protective Equipment (PPE)
- 3) Community Health and Safety
 - Water Quality and Availability
 - Structural Safety of Project Infrastructure
 - Life and Fire Safety (L&FS)
 - Traffic Safety
 - Transport of Hazardous Materials
 - Disease Prevention
 - Emergency Preparedness and Response
- 4) Construction and Decommissioning
 - Environment
 - Occupational Health and Safety
 - Community Health and Safety

IFC Performance Standards on Labor and Working Conditions

IFC — a member of the World Bank Group — is the largest global development institution focused exclusively on the private sector in developing countries. The institution has defined eight Environmental and Social Performance Standards (PS) for IFC-financed projects with the private sector, which have become an international benchmark. The IFC PS 2 on labor and working conditions have been in part guided by a number of international conventions and instruments, including

those of the International Labor Organization (ILO) and the United Nations (UN).²¹ PS2 recognizes that the pursuit of economic growth through employment creation and income generation should be accompanied by protection of the fundamental rights of workers. Implementation of the Program will require a workforce that will be managed in accordance with applicable national and international labor requirements and relevant standards and good practices concerning environmental, health and safety conditions for workers.

ILO Core Labor Standards

The ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998 and amended in 2022, identifies five fundamental principles and rights at work, which focus on ensuring: (1) freedom of association and the effective recognition of the right to collective bargaining; (2) the elimination of all forms of forced or compulsory labor; (3) the effective abolition of child labor; (4) the elimination of discrimination in respect of employment and occupation; and (5) a safe and healthy working environment. These are fundamental rights that enable people to defend and improve their rights and conditions at work and to work in freedom and dignity. These principles are covered in the ILO's Declaration on Fundamental Principles and Rights at Work (1998, as amended in 2022).

These five fundamental principles and rights are reflected in ten fundamental International Labor Organization (ILO) Conventions. The ten fundamental Conventions are:

- ILO Convention 87 on Freedom of Association and Protection of the Right to Organize
- ILO Convention 98 on the Right to Organize and Collective Bargaining
- ILO Convention 29 on Forced Labor
- ILO Convention 105 on the Abolition of Forced Labor
- ILO Convention 138 on Minimum Age (of Employment)
- ILO Convention 182 on the Worst Forms of Child Labor
- ILO Convention 100 on Equal Remuneration
- ILO Convention 111 on Discrimination (Employment and Occupation)
- ILO Convention 155 on Occupational Safety and Health
- ILO Convention 187 on the Promotional Framework for Occupational Safety and Health

Chapter 2.1.3 gives an overview on the conventions ratified by the Government of Lebanon.

KfW Sustainability Guidelines

The KfW Sustainability Guidelines describe principles and procedures to assess and manage the environmental, social and climate risks and impacts during the preparation and implementation of measures financed by KfW Development Bank. The KfW Sustainability Guidelines describe principles and procedures to assess and manage environmental, social and climate risks and impacts during the preparation and implementation of measures financed by KfW Development Bank. The guidelines require consideration of applicable national legal requirements and relevant

²¹ These conventions are the eight ILO Core Conventions mentioned below under ILO Core Labor Standards as well as the UN Convention on the Rights of the Child, Article 32.1 and the UN Convention on the Protection of the Rights of all Migrant Workers and Members of their Families

international environmental and social standards, including the World Bank Environmental and Social Standards (ESS), the World Bank Group General and relevant sector-specific Environmental, Health and Safety (EHS) Guidelines, and the Core Labor Standards of the International Labor Organization (ILO).

Furthermore, they require a screening process for the early identification and assessment of potential environmental and social risks and impacts and define the categories for the classification of projects according to the relevance of their environmental and social impacts and risks. The categories are A (high risk), B+ (substantial risk), B (moderate risk) and C (low risk) (see also Chapter 4.2.1). This classification forms the basis for the environmental and social risk categorization of the Program.

The Guidelines also require stakeholder engagement and information disclosure commensurate with the environmental and social risks and impacts of the respective measure, as well as appropriate mechanisms for receiving and addressing grievances and complaints.

BMZ Guidelines for Human Rights 2013

These guidelines focus on incorporating human rights standards and principles, including gender, into the planning and execution of development assistance under the German Financial Cooperation framework. Of relevance is the need to ensure that project implementation is cognizant of the following human rights:

- Avoiding or minimizing instances of forced eviction/involuntary resettlements;
- Ensuring no forced labor;
- Avoiding child labor;
- Ensuring appropriate working/labor conditions;
- Ensuring equal opportunities in terms of participation in Program activities;
- Paying attention to issues of vulnerable groups which includes indigenous people, where relevant.

BMZ Strategy Paper on Development for Peace and Security 2013

The Federal Ministry for Economic Cooperation and Development (BMZ) requires all development programmes in countries affected by conflict, violence and fragility to be implemented according to specific quality standards. These standards imply that all programmes operating in such contexts apply appropriate risk management system and implement activities in a context-sensitive way, observing the Do No Harm-principle. On the basis of the Strategy Paper, a Peace and Conflict Assessment has been conducted for the Project that specifies relevant dimensions of conflict, violence and fragility, as well as expected related positive impacts, risks and potential unintended negative impacts and their mitigation measures.

UN Basic Principles and Guidelines on Development-based Evictions and Displacement, namely §§ 42, 49, 52, 54 and 60

When eviction is unavoidable and necessary for the promotion of the general welfare, the State must provide or ensure fair and just compensation for any losses of personal, real or other property or goods, including rights or interests in property. The obligation of States to refrain from, and protect against, forced evictions from homes and land arises from several international legal instruments that protect

the human right to adequate housing and other related human rights.

These Guidelines provide a practical tool to assist States and relevant agencies in developing policies, legislation, procedures and preventive measures to ensure that forced evictions are avoided and, where prevention is not possible, that effective remedies are available to persons whose human rights have been violated.

FAO Voluntary Guidelines on The Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security

The purpose of these Voluntary Guidelines is to serve as a reference and to provide guidance to improve the governance of tenure of land with the overarching goal of achieving food security for all and to support the progressive realization of the right to adequate food in the context of national food security.

2.3 Gap Analysis

This gap analysis identifies gaps between applicable national requirements and international environmental and social standards and defines the measures to be applied under the Programme to address these gaps.

2.3.1 Gaps: ESIA Process and Stakeholder Engagement

The following gaps have been identified regarding the environmental and social assessment process and stakeholder engagement:

- **Environmental and social assessment requirements:** Under Lebanese legislation, the environmental assessment requirements applicable to an intervention are determined through the national environmental screening process, which may result in the requirement for an IEE or EIA depending on the nature, scale and location of the intervention and the determination of the Ministry of Environment. International standards require environmental and social risks and impacts to be systematically identified, assessed and managed in a manner proportionate to their significance, including through appropriate environmental and social management instruments.
- **ESMF preparation:** International standards require the preparation of an ESMF for programmes where the specific locations, designs or details of all interventions are not fully defined at the time of environmental and social assessment, while Lebanese law does not provide for the preparation of an ESMF as a specific environmental and social management instrument.
- **Social Assessment:** Lebanese environmental assessment legislation focuses primarily on environmental impacts and does not provide the same comprehensive framework for the systematic assessment and management of social risks and impacts required under the applicable international environmental and social standards.
- **Risk Categories:** Lebanese environmental assessment legislation distinguishes between projects subject to an EIA, projects subject to an IEE, and projects not requiring either instrument under the national environmental assessment process. These requirements are not directly comparable with the environmental and social risk categorization applied under the applicable KfW framework (A, B+, B and C).

- **Stakeholder Engagement.** International standards require stakeholder engagement and information disclosure throughout the Project cycle, proportionate to the nature and scale of the environmental and social risks and impacts. Lebanese environmental assessment legislation provides for public participation primarily within the EIA process and does not establish an equivalent comprehensive stakeholder engagement framework covering the entire Project cycle.

Following measures are envisaged to compensate for identified gaps.

- MEHE will apply the environmental and social screening, categorization, assessment, management and monitoring procedures defined in this ESMF, in addition to applicable national environmental assessment requirements. The ESMF process addresses both environmental and social risks and impacts and provides for the preparation of site-specific environmental and social management instruments, as applicable to each intervention.
- The ESMF provides the overarching environmental and social management framework for interventions under both Phase 1 and Phase 2, including interventions for which the specific sites, designs or scope of works are not yet fully defined. Environmental and social screening will be undertaken for individual interventions in accordance with the procedures and risk categorization established in this ESMF.
- MEHE will ensure, stakeholder engagement, information disclosure and the availability of a grievance mechanism in accordance with the provisions of this ESMF and the Stakeholder Engagement Plan (SEP). Relevant environmental and social documents, including the ESMF, site-specific environmental and social management instruments and the SEP, will be disclosed in accordance with the applicable requirements.

2.3.2 Gaps: Labor and Working Conditions and OHS

The following gaps have been identified regarding Labor and Working Conditions and Occupational Health and Safety (OHS):

- **Freedom of association and Collective bargaining.** Gaps have been repeatedly noted by the ILO regarding freedom of association and the effective exercise of collective bargaining rights in Lebanon. Lebanon has ratified ILO Convention No. 98 on the Right to Organize and Collective Bargaining but has not ratified ILO Convention No. 87 on Freedom of Association and Protection of the Right to Organize.
- **Labor inspection.** The labor inspection system faces institutional and capacity constraints, including with regard to coordination and the effective enforcement of labor and OHS requirements. These constraints may affect the capacity to ensure consistent compliance with applicable labor and OHS legislation.
- **Grievance mechanism.** Lebanese labor legislation does not establish requirements for a worker grievance mechanism equivalent to those required under the applicable international environmental and social standards.
- **OHS provisions.** The Lebanese OHS legislation (especially the Code of Labor and Decree No. 11802 and Decree No. 11958) regulates many aspects of occupational health and safety. However, the applicable international standards and World Bank Group EHS Guidelines

provide more comprehensive requirements and good international industry practice for the identification, prevention and management of OHS risks.

- **Third party workers.** National legislation does not provide the same comprehensive requirements as the applicable international standards regarding the management of labor and OHS risks associated with contracted workers, subcontractors and other third parties involved in Project implementation.

The following measures are envisaged to compensate for identified gaps.

- MEHE will integrate the applicable E&S requirements regarding working and labor conditions (summarised in site-specific ESMPs) into specifications, bills of quantities, bidding documents and finally into contracts with the construction firms/Contractors, including for construction, extension and rehabilitation works, as applicable.
- During construction, MEHE will ensure that the Contractors comply with the applicable OHS requirements on the construction site, including requirements for initial OHS induction and training of workers, and will monitor compliance through regular site inspections. Where non-compliances are identified, MEHE will require appropriate corrective actions to be implemented by the Contractor.
- MEHE will ensure that workers and affected communities are informed of and have access to the applicable grievance redress mechanism and that grievances are documented and responded in a timely and adequate manner.
- As a standard, applicable Lebanese OHS requirements will be complied with. Where national requirements differ from the levels and measures presented in the applicable EHS Guidelines, the more stringent requirements will be applied. Contractors will be responsible for implementing these requirements as specified in their contractual obligations.
- MEHE will monitor ESMP implementation and will report on the compliance with all ESHS Standards in its regular reporting to KfW. Where non-compliances are identified, MEHE will require the Contractor to implement appropriate corrective actions and will follow up on their implementation and close-out.

2.3.3 Gaps: Land Acquisition and Resettlement

The following gaps have been identified regarding land acquisition and resettlement:

- **Social Impacts.** The Lebanese legislation does not require any assessment of social impacts and risks resulting from private or public projects. Thus, social and economic impacts related to land acquisition or the change in land use or restrictions on access may not be addressed to the same extent as required under applicable international standards.
- **Persons without formal rights.** Regarding resettlement and compensations, the Lebanese legislation only grants rights to persons with formal land rights. Thus, adverse impacts on persons with informal rights may not be considered. They also have no legal basis to de-

mand any form of compensation in case of loss of shelter or mean of livelihood.²²

- **Involuntary Donations.** While the donation and transfer of land to a Ministry or other public authority is subject to applicable legal procedures and formal documentation, there are no specific procedures under Lebanese legislation for assessing whether a land donation presented as voluntary has in fact been made without coercion, manipulation or undue pressure. Consequently, the formalization of a land donation does not, in itself, establish that the donation was genuinely voluntary.

The following measures are envisaged to compensate for identified gaps.

- MEHE will consider all potential social impacts on project affected persons or households, irrespective of whether affected persons have formal or informal rights on the land envisaged for concerned by the project.
- Sites which require resettlement of informal or formal land users or households are not eligible under the Program.
- MEHE will follow the procedures defined under S2R2 to assess and document, to the extent possible, that any land donation to MEHE has been made voluntarily and without coercion, manipulation or any other form of pressure. This assessment will be undertaken separately from the legal process for the transfer of land ownership. Where land ownership is transferred to MEHE, the donation and transfer of ownership will be formally documented in accordance with applicable Lebanese legal requirements.

²² UN Habitat, EU, UNHCR, n.d. : The occupation of another person's real property (e.g. squatting) as well as the occupation of public property in Lebanon, regardless of the length of occupation or the improvements the occupant makes to the property, does not grant any real right to the occupant. Rather, such occupation is regarded as a criminal act.

3 Potential Environmental and Social Impacts and their mitigation

3.1 Positive Impacts

Based on desk research, interviews held and visits to a sample of existing school as well as possible plots for new school construction, the following environmental and social impacts are identified as likely positive impacts for the planned Program, including new school construction, extension and rehabilitation:

Environmental

- **Energy efficiency and sustainability of buildings.** The construction of new schools and the extension and rehabilitation of existing schools provide opportunities to improve building sustainability and energy and water efficiency, thereby contributing to reduced energy and water consumption. Specific measures may include rooftop solar photovoltaic (PV) systems to generate on-site renewable electricity and reduce schools' dependency on the national electricity grid, and rainwater harvesting systems to collect and reuse rainwater for non-potable uses, thereby reducing dependency on municipal water supply and groundwater resources.

Social

- **Improve access and internal efficiency.** The provision of purpose-built, well equipped new schools and the improvement and expansion of existing school facilities will improve the learning environment for students. Through the increased attractiveness and capacity of the public schools, it is expected that enrolment rates can be increased, transition rates improved and drop-out rates in public schools reduced.
- **Inclusion.** The provision and improvement of public schools with barrier-free access will facilitate access for students with disabilities.
- **Poverty Reduction.** The strengthening of the public school system in remote and under-served areas will especially be of benefit to poor and vulnerable students because the public school system mainly serves the socio-economically less privileged part of the population.
- **Gender.** Providing gender-sensitive facilities, such as adequate WASH-facilities and changing rooms etc. will create a safer and more secure environment supporting especially the retention of girls in schools.
- **Employment.** The contracting of national/local construction firms for construction, extension and rehabilitation works will contribute to employment opportunities.
- **Community life and social cohesion.** New and improved school facilities will provide improved facilities for sports and cultural events, thus supporting school as well as extracurricular activities and events at the schools. This may contribute to improving social cohesion and community life.
- **Institutional strengthening.** The Program also aims to strengthen MEHE's capacity for the planning and implementation of school construction, extension and rehabilitation measures and will thereby contribute to institutional strengthening and capacity

development within the Ministry.

3.2 Negative Impacts and their Mitigation

The following table summarizes the likely negative environmental and social impacts identified for the Program, including new school construction, extension and rehabilitation activities, and proposes possible mitigation measures. The last column identifies the relevant World Bank's Environmental and Social Standards (ESS):

Table 2 - Likely negative E&S risks under the Program and possible mitigation measures

Likely negative environmental risks	Possible mitigation measures	Relevant ESS
- Environmental Pollution. Construction, extension and rehabilitation activities may cause adverse environmental impacts, including dust and air emissions, noise and vibration, generation of construction and demolition waste and wastewater, soil contamination, erosion and improper management of hazardous materials and waste. Rehabilitation works in existing buildings may also involve removal or disturbance of existing building materials requiring appropriate handling and disposal	- E&S Management Plans (ESMPs) will be prepared for individual interventions, as applicable, based on the environmental and social screening and assessment process, and will identify relevant risks and define appropriate mitigation measures. Applicable ESMP requirements will be integrated into the respective construction contracts - Contractors will be required to implement appropriate measures for dust, noise and vibration control, waste and wastewater management, hazardous materials management, erosion and pollution prevention, as applicable - Monitoring and reporting will be undertaken by MEHE supported by the Implementation Consultant (IC). MEHE will require appropriate corrective actions where non-compliances are identified and follow up on their implementation	- ESS3 - ESS4

Likely negative environmental risks	Possible mitigation measures	Relevant ESS
- Impacts on biodiversity and living natural resources. Clearing of plots for new school construction as well as site preparation, vegetation clearance and construction activities associated with new construction, extension and rehabilitation works, where applicable, may have potential impacts on natural habitats, vegetation as well as fauna and flora.	- Construction in Protected Sites are not eligible under the Program. - E&S Management Plans (ESMPs) will be prepared for each site, assessing relevant risks and defining appropriate mitigation measures. Applicable ESMP requirements will be integrated into the respective contracts with construction firms. - Unnecessary vegetation clearance will be avoided and disturbance will be limited to the areas required for the works. - Monitoring and reporting will be undertaken by MEHE supported by the Implementation Consultant. MEHE will require appropriate corrective actions where non-compliances are identified and follow up on their implementation.	- ESS6

Likely negative environmental risks	Possible mitigation measures	Relevant ESS
- Damage to Cultural Heritage. Construction, extension and rehabilitation activities, particularly those involving excavation or other ground disturbance, may result in accidental damage to previously unidentified archaeological or cultural heritage resources in the event of chance finds. Construction activities may also adversely affect known cultural heritage located within or in the vicinity of Project sites.	- Protected sites and sites with visible cultural heritage are not eligible under the Program. - E&S Management Plans (ESMPs) have to be elaborated for each site assessing all risks and defining mitigation measures. Applicable ESMP requirement will be integrated into the respective contracts of construction firms. - A Chance Finds Procedure will be applied to construction activities involving excavation or other ground disturbance and will be included in the relevant contractual requirements. - Monitoring and reporting will be undertaken by MEHE, supported by the Implementation Consultant (IC). MEHE will require appropriate corrective actions where non-compliances are identified and follow up on their implementation.	- ESS8
Negative Social Impacts	Possible mitigation measures	
Labor and working conditions. Adverse impacts on workers of contracted firms may result due to forced and/or child labor, inadequate working conditions, restrictions on freedom of association and collective bargaining, as well as the absence of mechanisms to raise workplace concerns. - Workers may also be exposed to occupational health and safety (OHS) risks during construction, extension and rehabilitation works, including risks	- Requirements regarding labor and working conditions and occupational health and safety, as defined in applicable national legislation, World Bank ESS2, the applicable World Bank Group EHS Guidelines and other applicable international standards, will be integrated into the respective bidding documents and construction contracts.	- ESS2

Likely negative environmental risks	Possible mitigation measures	Relevant ESS
associated with work at height, operation of heavy machinery and equipment, electrical works, excavation, manual handling, exposure to dust, noise and hazardous materials, and other construction-related hazards.	- Contractors will be responsible for implementing the applicable labor and OHS requirements, including worker OHS induction and training, provision and use of appropriate personal protective equipment (PPE), safe working procedures, and measures for the prevention and management of occupational incidents and accidents. - Workers will have access to an appropriate worker grievance mechanism for raising workplace concerns. - Monitoring and reporting will be undertaken by MEHE, supported by the Implementation Consultant (IC). MEHE will require appropriate corrective actions where non-compliances are identified and follow up on their implementation.	
Community Health, Safety and Security. Construction extension and rehabilitation activities may have adverse impacts on the health and safety of community members, including students, teachers and school staff at existing schools. Potential risks include construction-related traffic and road safety risks, unauthorized access to construction areas, exposure to dust, noise, hazardous materials, machinery and other construction hazards, as well as emergency situations.	- Appropriate measures and standards to minimize construction related community health and safety risks, including traffic and road safety risks, unauthorized access to construction areas, exposure to hazardous materials and other construction hazards, and to ensure appropriate emergency preparedness and response, will be integrated into the respective contracts. - For extension and rehabilitation works at existing schools, construction areas will be appropriately secured and	ESS4

Likely negative environmental risks	Possible mitigation measures	Relevant ESS
	separated from students, teachers, school staff and other users, and safe access to and operation of the school will be maintained, where the school remains operational during the works. - Monitoring and reporting will be undertaken by MEHE, supported by the Implementation Consultant (IC). MEHE will require appropriate corrective actions where non-compliances are identified and follow up on their implementation.	
- Increase in traffic during operation. The operation of new schools and extensions that increase the capacity of existing schools, may result in increased traffic during school opening and closing hours. Inadequate parking and drop-off/pick-up arrangements may result in roadside parking, traffic congestion and increased risks to pedestrian and road safety, particularly for students. Increased traffic may also contribute to localized air and noise pollution.	- Assess traffic, pedestrian access and road safety conditions during the planning and design of each individual new school and of extensions expected to result in increased school capacity. - Include appropriate parking spaces and drop-off/pick-up areas in the school design. - Provide appropriate measures for safe pedestrian access to the school, where required. - Consider available public and/or private transport services (where relevant)	- ESS4

Likely negative environmental risks	Possible mitigation measures	Relevant ESS
– Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. Adverse social impacts can result from change in land use, land ownership or restrictions on access to or use of land. Site preparation and construction may result in physical or economic displacement of formal or informal land users or affect existing economic activities. Such impacts may arise even where land is already owned by MEHE or has been donated to MEHE or another public authority.	– Land acquisition will not be financed under the Program. Sites physical or economic displacement of formal or informal land users or households in accordance with applicable international standards will not be eligible under the Program. – Conduct a prior assessment of each site to identify existing ownership, occupation and use of the land and potential social and economic impacts, with appropriate stakeholder participation to anticipate and avoid adverse impacts on Project-affected persons and communities. – Where land has been or is proposed to be donated, MEHE will assess and document, to the extent possible, that the donation has been made voluntarily and without coercion, manipulation or any other form of pressure. Where the donation involves the transfer of land ownership to MEHE, the transfer will be formally documented in accordance with applicable Lebanese legal requirements.	– ESS5
– Non-transparent school selection process. Decisions regarding the selection of sites for new schools and the selection of existing schools for extension or rehabilitation may be perceived as non-transparent, inequitable or influenced by clientelism. Such perceptions may create dissatisfaction or contribute to tensions between communities or	– Ensure a transparent and data-based selection process for new school sites and existing schools proposed for extension or rehabilitation, based on clearly defined and documented selection criteria.	– ESS1 – ESS10

Likely negative environmental risks	Possible mitigation measures	Relevant ESS
population groups, particularly where needs and available resources are perceived to be unevenly addressed.	– Ensure appropriate stakeholder engagement and public disclosure of all relevant information	
– Lack of stakeholder participation during planning and implementation. Insufficient stakeholder engagement may result in stakeholder concerns, needs and expectations not being adequately identified or considered during Project planning and implementation. This may lead to dissatisfaction, misunderstandings, reduced acceptance of Project activities, or grievances.	– Ensure adequate stakeholder engagement throughout Project planning and implementation, in accordance with the Stakeholder Engagement Plan (SEP). – Ensure timely disclosure of relevant project information in an accessible and appropriate manner. – Ensure that stakeholders are informed of and have access to the Project Grievance Mechanism.	– ESS1 – ESS10
– -Increasing access barriers for vulnerable students. Inadequate consideration of accessibility and the specific needs of vulnerable or disadvantaged students in the location, planning and design of new schools and in the extension or rehabilitation of existing schools may create or perpetuate barriers to accessing school facilities and services. This may particularly affect students with disabilities or reduced mobility and students from socio-economically vulnerable households.	– Consider accessibility and the needs of vulnerable and disadvantaged students during site-specific environmental and social screening and assessment and during the planning and design of Project interventions. – Ensure that new school construction, extensions and rehabilitation work incorporate appropriate accessibility and inclusive design requirements, in accordance with applicable standards.	– ESS1 – ESS4 – ESS10
– -Redistribution of school staff. The closing down of small and/or rented schools can have negative economic and/or social impact on the school staff, which has to be redistributed to other areas.	– Ensure adequate stakeholder engagement including consideration of the needs and concerns of vulnerable and	

Likely negative environmental risks	Possible mitigation measures	Relevant ESS
- Loss of community life. In case small and rented schools are closed down in a village, where the school has been an essential element of community life, social cohesion and community life may suffer. - Less parent and community involvement in school life at new school. A centrally located, larger all-through schools, may increase the distance between the school and the students' home town/village. Thus, parents and communities may have less identification with the new schools and, thus may be less in-volved in school life	- disadvantaged groups, in accordance with the SEP. - Include relevant site-specific mitigation measures in the ESMPs, as applicable, and monitor their implementation.	
- Social tensions at schools. Project-supported schools may serve students from different social, cultural, religious and nationality backgrounds. In the context of Lebanon's public education system, some schools operate a double-shift system, with morning shifts serving mainly Lebanese students and afternoon shifts serving primarily non-Lebanese students, including Syrian refugee children. Differences in access, use of facilities or perceived inequalities between groups or shifts may contribute to tensions or perceptions of exclusion if not adequately considered.	- Ensure equitable access to Project-supported facilities and equipment for students attending both morning and afternoon shifts, where applicable, without discrimination based on nationality or shift. - Ensure that students, parents and school staff have access to appropriate channels for raising concerns and grievances related to Project-supported facilities and activities.	- ESS1 - ESS10

Likely negative environmental risks	Possible mitigation measures	Relevant ESS
– Insufficient grievance mechanism. Dissatisfaction may arise where Project-affected persons and other stakeholders, including students, parents, teachers and school staff, are not adequately informed about or do not have access to effective channels for raising Project-related concerns and grievances. Workers may similarly be unable to raise workplace-related concerns if an appropriate worker grievance mechanism is not available.	– MEHE will ensure that an accessible Project Grievance Mechanism is established and maintained throughout Project implementation and that stakeholders are adequately informed of the available grievance channels and procedures. – Contractors will establish an appropriate grievance mechanism for Project workers, and MEHE, supported by the Implementation Consultant (IC), will monitor its implementation	– ESS1 – ESS2 – ESS10
– Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). Interaction between construction workers and school communities, including students and other community members, may create risks of inappropriate behaviour, sexual harassment, exploitation or abuse. Workers may also be exposed to sexual harassment in the workplace. – These risks may be elevated for renovation or extension works at schools that remain operational during construction, particularly where works cannot be fully completed within school vacation periods and interaction with students and staff — including female students and teachers — is more frequent or prolonged.	– Require Contractors and their workers to comply with Codes of Conduct (CoC) addressing appropriate behaviour and SEA/SH, including prohibited conduct and applicable sanctions. – Ensure that appropriate and confidential channels are available for reporting SEA/SH-related concerns, with such cases handled in accordance with survivor-centered principles and applicable referral procedures. – For renovation or extension works at occupied school sites, the additional site-specific measures set out in Annex 4, Section D (Generic ESMP Template) shall apply, including phasing of works around school hours, physical separation of work areas, mandatory SEA/SH training prior to mobilization, and prior coordination with the school administration.	– ESS2 – ESS4

4 ESMF Implementation Framework

4.1 Involved Stakeholders and Responsibilities

The following stakeholders will take over responsibilities and/or will be involved in the implementation of the ESMF:

4.1.1 The Ministry of Education and Higher Education (MEHE)

MEHE will have the overall responsible to implement the ESMF. Within MEHE this responsibility lies with the Projects and Programs Department (PPD) under the Directorate for General Education. MEHE will be supported by the Implementation Consultant (IC) in carrying out the environmental and social tasks defined under the ESMF and in accordance with the IC's Terms of Reference. MEHE's Regional Education Offices (REOs) will support PPD in the implementation of the ESMF, as appropriate. Main responsibilities of MEHE will include:

- Ensuring compliance with all relevant national legislation, as well as with the defined international environmental and social standards and mitigation measures.
- Ensuring that the design and planning of new schools, extensions and rehabilitation works is in compliance with national requirements and is aligned with international best practice.
- Ensuring that applicable E&S requirements and mitigation measures are incorporated into bidding documents and construction contracts.
- Monitoring the performance of contractors and sub-contractors and requiring corrective actions where non-compliances are identified.
- Ensuring appropriate stakeholder engagement and information disclosure and overseeing the implementation of the Project Grievance Mechanism.
- Ensuring that contractors provide the required E&S and OHS induction, training and awareness raising for construction workers, as applicable.
- Monitoring ESMF and site-specific ESMP implementation, with the support of the Implementation Consultant (IC).
- Reporting on ESMF implementation and E&S performance as part of the regular reporting to KfW.

4.1.2 The Ministry of Environment (MoE)

MoE will be involved at the early stages of the Project. It will assess the screening application form (Annex 4 of the decree 8633/2012) submitted by MEHE, supported by the Implementation Consultant and will determine the applicable environmental assessment requirements in accordance with Lebanese legislation. Depending on MoE's determination, an Initial Environmental Examination (IEE) or other environmental assessment documentation may be required for the respective intervention.

MEHE, supported by the Implementation Consultant (IC), will ensure compliance with any requirements resulting from the national environmental assessment process and their integration, as applicable, into the relevant site-specific environmental and social instruments and Project

implementation.

4.1.3 The Implementation Consultant (IC)

The Implementation Consultant will be financed from Program funds and will support MEHE in all phases of Program Implementation. The IC will support MEHE in the implementation of the ESMF and the management of environmental and social risks and impacts in accordance with applicable national requirements and international E&S standards.

The IC will support MEHE in the environmental and social screening and assessment of individual interventions and in the preparation of site-specific ESMPs and other E&S instruments, as applicable. The IC will ensure that relevant E&S requirements and mitigation measures are appropriately reflected in school designs, technical specifications, bills of quantities, bidding documents and construction contracts. This includes ensuring that, where confirmed feasible, provisions for rooftop solar photovoltaic (PV) systems and rainwater harvesting systems are incorporated into school designs and technical specifications, in order to reduce schools' dependency on grid electricity and water network supply, respectively.

During construction, the IC will support MEHE in monitoring contractors' compliance with applicable E&S requirements and site-specific ESMPs, identifying non-compliances and required corrective actions, and following up on their implementation. The IC will also support MEHE in stakeholder engagement, implementation of the Grievance Mechanism, and E&S monitoring, documentation and reporting. Cost implications for E&S tasks of the Implementation Consultant (IC) are presented in Chapter 5.

4.1.4 Construction Firms (Contractors)

The selected construction firms contracted by MEHE under the Project will be responsible for implementing the applicable E&S requirements and mitigation measures defined in the site-specific ESMPs and incorporated into their respective contracts. These requirements will include, as applicable, occupational health and safety (OHS), labor and working conditions, environmental protection, and community health and safety measures to protect workers, students, school staff and surrounding communities from risks associated with construction activities.

Contractors will be responsible for providing appropriate E&S and OHS induction and training to their workers, providing and enforcing the use of appropriate personal protective equipment (PPE), maintaining safe working conditions, and implementing the worker grievance mechanism and other applicable E&S requirements.

Contractors will monitor and document their compliance with the site-specific ESMPs, report on E&S performance and any incidents or non-compliances, and implement corrective actions where required. They will report on E&S performance to MEHE and the Implementation Consultant (IC) and cooperate with monitoring and supervision activities undertaken by MEHE and the IC.

4.1.5 Municipalities and Union of Municipalities

Municipalities and Unions of Municipalities represent the level of local government. MEHE will coordinate closely with the Municipalities and Unions of Municipalities as applicable, during the planning and implementation of Program interventions. They may support local coordination,

facilitate communication with communities and other local stakeholders, and provide information on local conditions, infrastructure, services and community concerns relevant to the proposed interventions.

Municipalities and Unions of Municipalities may also facilitate the communication of concerns or grievances raised by local residents through the Project Grievance Mechanism. They are also responsible for certain local public services and functions within their jurisdiction, including local roads, public spaces, urban planning in coordination with the Directorate General of Urban Planning (DGUP)²³, and aspects of solid waste management, in accordance with applicable legislation.

4.1.6 Other Local Stakeholders

Local stakeholders at existing schools, including school directors, teachers, administrative staff as well as students, parents and affected communities, should be appropriately informed and engaged during planning and implementation. This includes stakeholders of existing rented schools that will be closed following the construction and opening of new schools under the Program. Persons affected by the closure of existing schools and the transfer of students and staff to the new schools should be informed sufficiently in advance of the planned changes and appropriately engaged throughout the transition process. MEHE should manage the transition in a manner that avoids or minimizes potential adverse social impacts associated with school closure, redistribution of staff and transfer of students to the new schools.

For existing schools undergoing extension or rehabilitation, school directors, teachers, administrative staff, students and parents should be appropriately informed and engaged regarding the planned works, particularly where construction activities may affect school access, health and safety, use of facilities or continuity of school activities.

Local stakeholders at the new construction site including municipalities and neighboring residents and the wider local community, should be appropriately informed and engaged during the planning and implementation of the new schools. Engagement during the planning phase should take into account local views and concerns and support the identification of potential conflicts, risks and relevant community needs and considerations. Potential impacts associated with existing land use and access should also be assessed, including restrictions on access or economic activities, displacement of formal or informal land users, and potential encroachment on private property.

4.1.7 Donors

Other donors and development partners supporting school construction, extension and rehabilitation (e.g. WB, AFD, UNICEF etc.): A close coordination and communication between MEHE and all other donors involved in school construction and rehabilitation is essential. Coordination should particularly address school selection and prioritization, applicable design and construction standards, environmental and social requirements and procedures, stakeholder engagement, and operation and maintenance considerations. Such coordination should support consistency and, where feasible, harmonization of approaches, standards and criteria across interventions in the education sector.

²³ CDR, 2018.

4.2 Implementation Procedures

Site-specific Environmental and Social Management Plans (ESMPs) are the key tool to address potential negative impacts. The purpose of the ESMPs is to provide a consolidated site-specific summary of all Environmental and Social impacts and proposed mitigation measures relevant to planning and design, construction and operation of the schools. Through this, ESMPs will provide guidance for Implementing Partners and contractors on the roles and responsibilities of the different stakeholders, the applicable standards, stakeholder engagement and grievance redress mechanism. An exemplary outline of an ESMP (including an ESMP template) can be found in Annex 4. This outline can be used as a basis for the elaboration of site-specific ESMPs and be adapted accordingly.

The site-specific environmental mitigation measures (summarized in the respective ESMP) will be included into the design, tender and contract documents for construction works. The environmental mitigation measures should be listed (item by item) in the Bills of Quantities or the specifications and each one costed by the contractor. These mitigation measures ought to be part of the total contract sum and are to be executed by the contractor. Roles and responsibilities for mitigation must be clearly assigned and communicated to the relevant contractor or consultant. Any planning will be done in a conflict-sensitive way, taking into account aspects of the Peace and Conflict Assessment and the Target Group analysis (see Annex 7 and 8).

MEHE will have the overall responsibility for the implementation of the ESMF and respective ESMPs and will be supported by the IC. The ESMF shall become part of the Separate Agreement signed by MEHE and KfW, thus defining processes and standard to ensure the assessment, management and adequate mitigation of risks caused by the Program.

Each construction measure under this Program will have to be reviewed and checked regarding its E&S impacts and risks. Thus, the following steps should be followed to ensure ESMF implementation:

4.2.1 Step 1: Initial Screening of sites to determine risk management approach

As soon as final construction sites are known, MEHE (with support of the Consultants) will conduct a screening of each individual site based on a screening checklist. The objective of the assessment is to rapidly identify environmental and social risks for the respective site and to decide which level of environmental and social assessment will be necessary to elaborate a site-specific ESMP. The checklist in Annex 3 shall be used as a basis for the screening but may be complemented if additional risks appear likely during project preparation.

Based on the screening results, each individual site will be categorized according to the relevance and significance of its potentially adverse environmental and social risks and impacts. The categories applied are A, B+, B and C, in accordance with the applicable KfW Sustainability Guideline. Category C is in general not relevant for school construction projects because any measures involving construction works require at least a B categorization according to KfW guidelines. The program-specific risk screening categories are summarized in the following table:

Table 3 - Site-specific screening categories (A, B+, B, C)

Category		Impacts and risks	
A	High Risk	- Diverse significant adverse E&S risks and impacts, because measures are - o of complex nature - o of large scale - o irreversible or unprecedented - o in sensitive location - Affected area is larger than sites of physical works - Measures convert or alter natural habitats, generate significant hazardous materials, or entail major resettlements	Not eligible
B+	Substantial Risk	- Single significant risks and impacts in individual areas - o higher risks than for B projects - o but less diverse and unprecedented than under A projects	eligible
B	Moderate Risk	- Potential adverse impacts are limited in scale (mostly site-specific) and in most cases reversible - Impacts can be addressed through standard or best-practice mitigation measures and stakeholder engagement	eligible
C	Low or no Risk	- Minor adverse or no E&S risks and impacts - (Not applicable for construction projects, which have to be at least B)	in general, not applicable for construction works

Source: joyn-coop based on KfW information

Only project sites categorized as B or B+ project will be eligible for the Program. For sites classified as B, a simple E&S site risk assessment based on the Site E&S Checklist attached in Annex 3 will be sufficient. For sites classified as B+, a scoped site-specific ESIA report has to be elaborated.²⁴ If a site is categorized as A, it will not be eligible under the Program. Thus, MEHE would have to propose an alternative site. Or in case this would lead to a lower risk categorization, MEHE could redesign the planned school. Also, for sites classified as B or B+ it should be considered if adjustments are possible to avoid, reduce or minimize the risks. For this purpose, it could be considered if alternative sites are more suitable or if adjustments of the planned measures are possible. The E&S assessments will deliver the information necessary for drafting site-specific ESMPs. Due to the type and size of the construction measures, it is expected that most of the construction sites will be classified as B.

Part of the screening will also be to clarify if an EIA or IEE has to be conducted and approved according to national Lebanese legislation. Considering the results of the site-specific screenings, MEHE will submit a screening application form (Annex 4 of Decree 8633/2012) to MoE. On this basis, MoE will inform MEHE if an EIA or an IEE or no further environmental assessment is required according to national law. The applicable national environmental assessment requirements will therefore be determined on a site-specific basis following submission of the screening application and review by MoE, taking into account the characteristics and location of the proposed intervention, including the criteria set out in Annex III of Decree 8633/2012.

In case MoE decides that an EIA according to national law is required the site-specific risk categorization under the Program will be reviewed to determine whether the site falls within Category A and is therefore not eligible for financing. If MoE should decide that an IEE is necessary the site-specific risk categorization under the Program will likewise be reviewed, including whether the identified risks warrant a B+ categorization. MoE's determination of the applicable national environmental assessment instrument does not, by itself, determine the Program's E&S risk categorization, which will be determined separately based on the site-specific E&S risks and impacts and the applicable KfW requirements.

4.2.2 Step 2: Stakeholder Engagement and Information Disclosure

MEHE will engage with stakeholders throughout the project life-cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders. As soon as sites are selected, local stakeholders should be consulted to assess possible environmental and social risk during planning, construction and operation of the Program as well as the demand for schooling and local preferences for schooling. The engagement of local stakeholders should be a continuous process throughout which MEHE will continue to engage with and provide timely and sufficient information to stakeholders.

Stakeholder engagement will help MEHE to assess possible conflicts and adverse social impacts related e.g. to the site selection process, land issues, the closing down and/or merging of schools etc.). As stakeholder consultations create transparency and give the local stakeholders a room to communicate their interest and concerns, the implementation of stakeholder engagement is a

²⁴ This scoped ESIA report should follow the standard outline as described under Chapter D (page 25) of World Bank, 2017.

mitigation measure in itself, but it might also show the need for further mitigation measures. The provisions resulting from the stakeholder engagement will have to be integrated into the site-specific ESMPs and (if relevant) should also be considered for the school planning and design. In particular, conflict risks and measures to avoid, minimize or mitigate these risks as identified in the Peace and Conflict Assessment (see Annex 7 and Chapter 5) should be considered.

The process of stakeholder engagement will involve the following: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

Adequate information disclosure will allow stakeholders to understand the risks and impacts of the construction measures and potential related opportunities. MEHE will provide stakeholders with access to all relevant information, as early as possible, and in a timeframe that enables meaningful consultations with stakeholders on the project design.

MEHE will ensure that all stakeholders will have access to its grievance mechanism to raise grievances and concerns related to the environmental and social performance of the Program. For this, MEHE's existing grievance mechanism will be used (see Chapter 6.3).

To secure a systematic approach of stakeholder engagement, MEHE (supported by the IC) will implement a Stakeholder Engagement Plan (SEP) and update it, as necessary, to reflect site-specific stakeholders, engagement activities, risks and information disclosure requirements as individual Program sites and activities are further defined. This SEP should be proportionate to the nature and the scale of the site.

Guidance for applying and, where necessary, updating the project-level SEP for individual Program sites and activities is provided in Annex 5.

4.2.3 Step 3: Assess E&S risks and elaborate ESMPs

The simple site risk assessment (in case of a B measure) or the scoped ESIA report (in case of a B+ measure) will identify and assess potential environmental and social impacts for each school Program sites. During this step, MEHE will assess if and how the identified impacts and risks can be avoided or reduced (e.g. by redesigning the measures). Finally, for all impacts and risks that cannot be avoided or reduced, MEHE will determine adequate mitigation, management and monitoring measures. All defined measures will be summarized in an ESMP, which will become an integral part of the bidding and contract documents with the construction contractors.

In case a project site **categorized as B**, the Site E&S Assessment Checklist in Annex 3 can be used to quickly assess relevant E&S risks and help identify the applicable mitigation measures. The checklist for the simple site risk assessment provides specific references to sections of the generic ESMP template in Annex 4, which can potentially be triggered if a specific risk has been identified. The generic template covers most common risks on a construction site of the expected size. Thus, adaptations will be necessary but are expected to be few in scope.

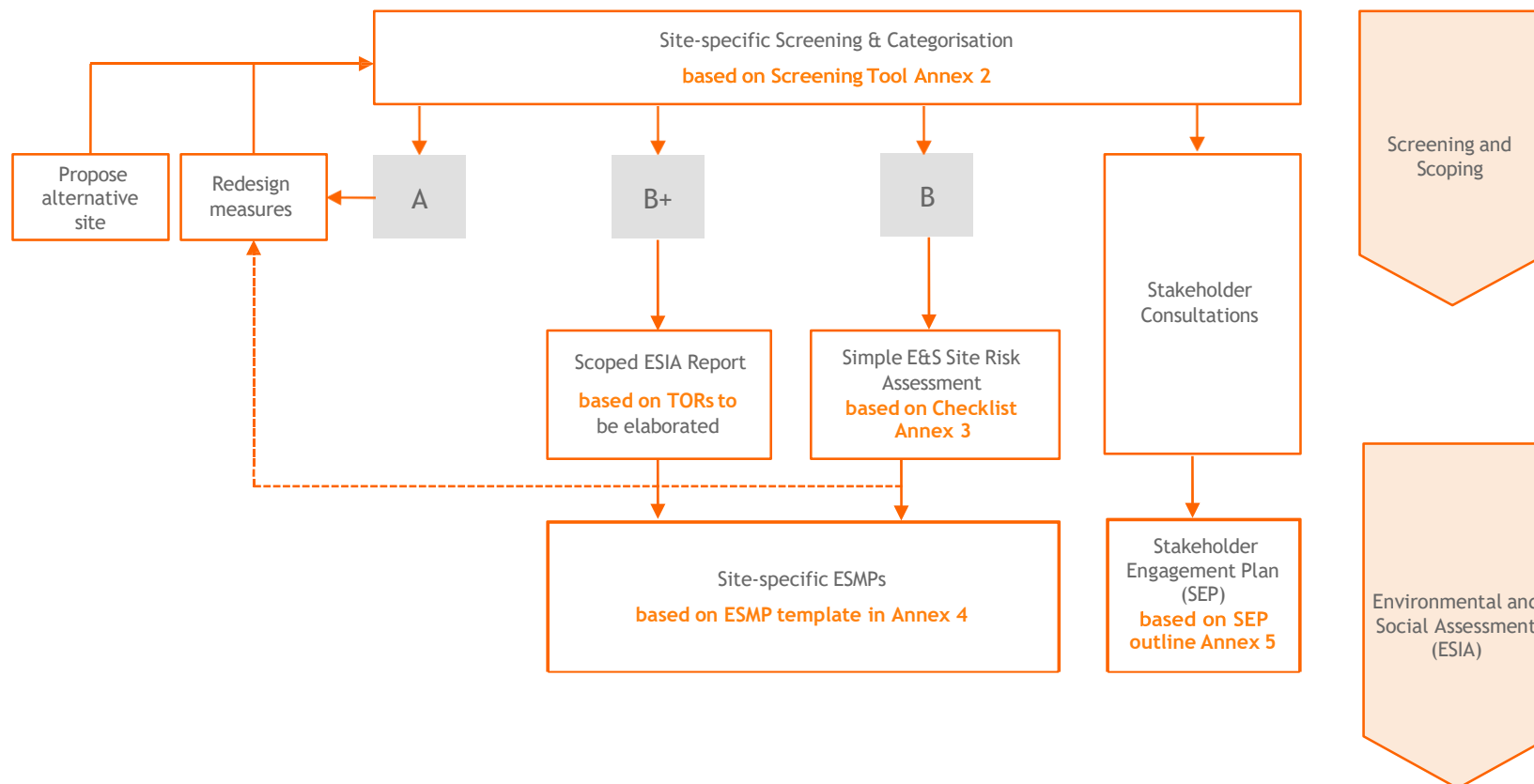
In the unlikely case of sites **categorized as B+**, a scoped ESIA will be necessary, which will also comprise a site-specific ESMP. MEHE/the IC will conduct a scoping to define TORs for the ESIA report and contract a specialist consultant for its elaboration. The template in Annex 4 can also be

used in this case to elaborate a site-specific ESMP, but it is to be expected that more adaptations will be necessary to cover all site-specific risks.

The required assessment should, to the extent possible, cover both national and KfW requirements so that only one report needs to be elaborated.

The following graph gives an overview of the procedures described under step 1-3 and makes reference to the tools provided under this ESMF for each step.

Figure 2 - Overview of risk screening categories (including tools to be provided under the ESMF)



Source: joyn-coop

4.2.4 Step 4: Implement ESMPs

While the site-specific ESMPs must be implemented by the Contractors under the supervision of the Implementation Consultant (IC), MEHE will have the overall responsibility for their implementation. To ensure that requirements are binding, the ESMPs will be integrated into the respective specifications, bills of quantities, bidding documents and contracts with the construction firms. Furthermore, contractors will be obliged to further convey the requirements to any sub-contractors or suppliers.

4.2.5 Step 5: Monitor and report on ESMP and SEP implementation

The Implementation Consultant (IC) will undertake regular monitoring, including site visits, to verify that the construction firms comply with the requirements defined in the site-specific ESMPs. MEHE will retain overall responsibility for overseeing ESMP implementation and will require the Contractors and the IC to regularly report to MEHE on ESMP implementation and compliance.

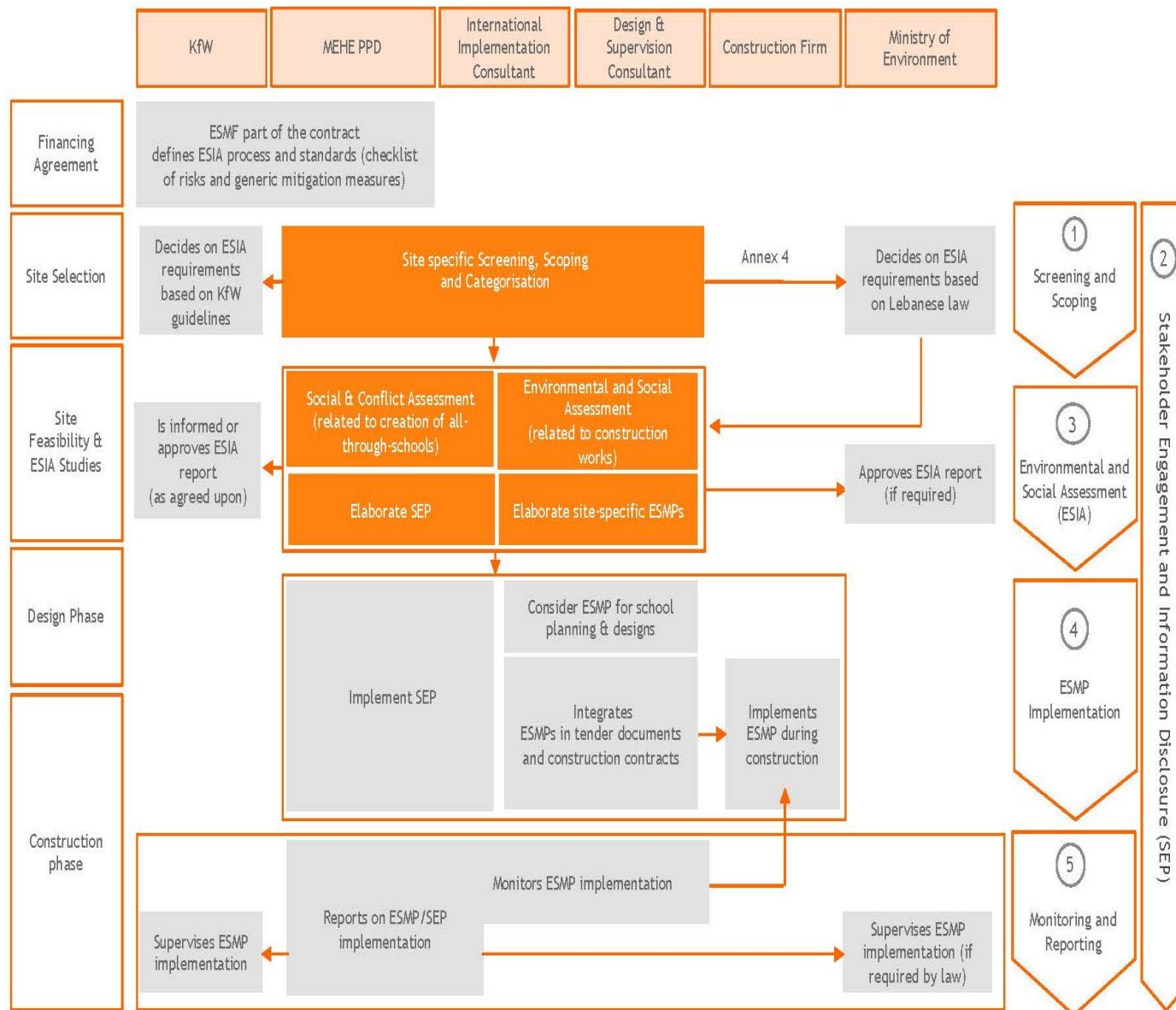
The Contractor will be responsible for reporting incidents²⁵ to MEHE and the Implementation Consultant (IC), while the IC will monitor incident reporting and follow-up actions and inform MEHE as appropriate. Incident reporting and investigation enables lessons to be learned and actions to be taken to prevent reoccurrence and reduce the number and severity of future incidents. Any Major Incident occurring at a Project construction site or arising from construction activities shall be reported by the Contractor or subcontractor to MEHE and the IC as soon as possible and no later than 24 hours after the incident occurs.

MEHE will report through its regular reporting to KfW on the ESMP and SEP implementation (and also to MoE, if applicable). KfW will assess the ESMPs and their implementation randomly on the basis of reports submitted as well as during annual program progress reviews.

The following figure gives an overview of the overall ESIA process, also illustrating the responsibilities of involved stakeholders:

²⁵ Definition of Major Incident: Any social, labor, health and safety, security or environmental incident or accident having, or which would reasonably be expected to have, a negative impact on the Project. This may include explosions, fires, spills or workplace accidents resulting in serious or multiple injuries or major pollution. Any injury to an employee of the Contractor, subcontractor or supplier that results in lost working time (Lost Time Injury) is considered a Major Incident. Social unrest or violence in or close to the community where the Project is located, as well as labor strikes at the Project construction site, are also considered Major Incidents.

Figure 3 - Overview on ESIA procedures and responsibilities



4.3 Grievance Mechanism

As part of its community liaison process, MEHE will use its Grievance Mechanism (GM) to ensure that all stakeholder comments, suggestions, objections and complaints are captured and considered. It will allow the affected community and the workers to express their concerns and any complaints directly to the Ministry. Timely redress and resolution of grievances is vital to ensure successful implementation of the Project. Thus, all complaints should be handled without prejudice. The Grievance Mechanism should be designed to:

- address the risks and impacts on affected communities,
- be culturally appropriate,
- be clear and accessible for any individual or group at no cost (vulnerable groups),
- be transparent and including regular reporting, and
- be preventive of retribution and to not impede access to other remedies.

The GM will be open to all persons and institutions affected by or involved in the Program, which are:

- Firms engaged in tender procedures under the Program
- Construction workers and employees of suppliers (contractors including subcontractors)
- Community members
- School staff, teachers and students

This Grievance Mechanism will be disclosed to the workers (as part of the Induction Training) and the community members, school staff, teachers and students (as part of the on-going stakeholder engagement activities). MEHE should designate a local contact person or institution at each site, which serves as a local contact point for receiving and acknowledging grievances.

MEHE will use its existing central Grievance Mechanism (GM), operated through its national call center, as the primary uptake channel for the Project. Complaints related to the school construction and rehabilitation activities will be identified and forwarded to the Project and Programs Department (PPD), which will coordinate with the Implementation Consultant (IC) to ensure timely follow-up, investigation and resolution.

To strengthen accessibility, the Project has established a dedicated grievance mobile number (+961 76 399 882), managed by the Environmental and Social Specialist of the IC, through which grievances, inquiries and requests for information can be submitted by phone call or WhatsApp. Other channels include the MEHE call center (+961 1 77 28 88 / 77 22 88 / 77 22 99), written grievance forms available at the concerned municipalities, and postal submissions addressed to MEHE headquarters. Anonymous grievances may also be submitted.

The GM will be widely communicated through stakeholder engagement activities, municipalities, project signage and MEHE communication channels. Grievances related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) will be handled confidentially and referred through the appropriate safeguarding pathway in accordance with the procedures established in the SEP. Further details on GM procedures, responsibilities, processing timelines, uptake channels, grievance forms and the grievance log are provided in the SEP.

5 Cost Implications of the ESMF

The implementation of this ESMF will have the following cost implications:

ESIA Coordination and Supervision by IC. Major costs arise from the personnel cost of the IC for preparation, coordination and supervision of ESMF implementation. International and local expert costs are covered under the contract of the IC with MEHE.

ESMP preparation. Costs for ESMP preparation will depend on the site-specific screening categorisation. In the case of a simple risk assessment based on a checklist, the assessment and preparation of the site-specific ESMP will be undertaken by the Implementation Consultant (IC), under the overall oversight of MEHE, and will be covered by the personnel costs of the IC contract. In case of a scoped ESIA, additional costs have to be considered for scoping and elaboration of an ESIA report by a specialist consultant. This is, however, unlikely and if required, the associated costs should be covered from the Project contingencies.

EMSP implementation. The implementation of mitigation measures by the Contractor are likely to have only few cost implications, since most aspects are covered within good construction practices. Major measures are the employment of an E&S Site Officer on each site as well as training measures for workers on OHS issues. Any of those Contractor's tasks will be included under the construction costs. Due to this and other E&S requirements related to the construction site (e.g. fencing, additional OHS measures to comply with international standards etc.) construction costs might slightly rise (estimated at around 10.000 EUR per site). The actual costs will depend on the nature and scale of the works at each site, particularly as the Program includes both new school construction under Phase 1 and extension/light rehabilitation works under Phase 2.

The overall costs for ESMF implementation will therefore depend on the final number of Program sites, their site-specific E&S risk categorisation, and the nature and scale of the works. The indicative costs presented below should be reviewed and updated once the final sites and scope of works under both phases are confirmed.

On this basis, costs for ESMF implementation are estimated to amount to around EUR 110.000. The following table summarises the indicative calculations:

Table 4 - Cost implications of the ESMF for the Program Budget

Item	Unit Rate EUR	Est. Quantity	Total in EUR
IC ESIA Coordination & Supervision			44.000
International Environment/Social expert	4.000	6	24.000
Local E&S expert	2.000	10	20.000
ESMP preparation			-
Simple Checklist and ESMP Template		5 plots	MEHE/IC
ESMP Implementation			50.000
Contractor: E&S Site Officer/ Consultant		included in construction costs	
Increased Construction Costs	10.000 per site	5 sites	50.000
Total (without contingencies)			94.000
Contingencies			11.000
Total (with contingencies)			110.000

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Annexes

Annex 1: E&S Screening and Risk Categorization of the Program (based on the KfW-Screening Tool)

Short description of the Project	Construction of new public schools under Phase 1 and extension/light rehabilitation of existing public schools under Phase 2. Phase 1 site selection has advanced, while the specific schools and scope of works under Phase 2 are not yet fully defined.
Is Project listed in illustrative list for A, B or C Projects	Yes, national EIA category: EIA, IEE or no further environmental assessment required under Decree No. 8633/2012, as determined by MoE. as
Does national law require an ESIA?	To be determined through screening by the Ministry of Environment in accordance with Decree 8633/2012. An IEE or EIA may be required depending on the nature, scale and location of the intervention.

Environmental Risks			
	Categorization	Options to choose from:	Comment
Type of Project Location	Multiple sites comprising new construction, extension and rehabilitation interventions	- New site (green field) - Site expansion - No change/additional land change - No site-specific activities (training etc.) - Unknown (diverse small site as part of open program) - Unknown (diverse larger sites as part of open program) - Unknowns (individual site)	Sites may include new greenfield sites under Phase 1 and existing school sites under Phase 2. The characteristics of each site will be confirmed through site-specific screening.

Environmental Risks			
Current use of Project Location	The characteristics and current use of each site will be confirmed through site-specific screening.	- Unused/natural state - Agricultural use - Rural landscape/structures - Residential area - Multiple locations/Overall activities - Industrial area - unknown	The current use and characteristics of each site will be confirmed through site-specific screening. Site-specific environmental and social assessment and management instruments will be prepared, as required, prior to implementation. Relevant for site-specific screening
Estimated land requirements	Variable / to be confirmed through site-specific screening	- Unknown - small <1ha - middle 1-5 ha - extensive 5-15 ha - huge >15ha	Land requirements will vary depending on whether the intervention involves new construction, extension or rehabilitation and will be confirmed through site-specific screening. No land acquisition will be financed under the Project.
Biodiversity of the location and protection status	Potential impacts on ecologically valuable areas to be determined through site-specific screening	- Project in protected area/habitat - Project in neighborhood of naturally valuable area/habitat - Potential impacts on ecologically valuable areas - No impacts on ecological valuable areas	Sites located within protected areas or other environmentally sensitive areas that are incompatible with the Project's eligibility criteria will not be eligible. Proximity to, and potential impacts on, ecologically valuable areas and habitats will be assessed for each intervention during site-specific screening. Site-specific environmental and social assessment and management instruments will be prepared, as required, prior to implementation.

Environmental Risks			
Expected risks for residents	Diverse small to medium risks	- No risks - Diverse small risks - Diverse medium risks - Diverse higher risks (noise, air, water) - High risks due to explosion/fire - Risk of epidemical diseases - Integrated dam (energy/water provision) - Transport of hazardous/dangerous substance/goods - Significant increase of high-load traffic - High worker influx/migration - Transmission Land lines (>200kV) - Armed security personnel	It is likely that there are diverse small to medium risks associated primarily with construction, extension and rehabilitation works. In general, risks are estimated to be temporary and mainly limited to the construction site and its immediate surroundings, and are largely reversible with appropriate mitigation measures. Relevant for site-specific screening and further E&S risk assessment - Pollution affecting residential areas - Hazardous waste and wastewater/sewage where applicable

Social Risks			
	Categorization	Options to choose from:	Comment
Loss of livelihood (economical) or re-settlement (physical)	No resettlement expected	- Physical or economical resettlement of persons with informal rights - Physical resettlement > 200 persons - Physical resettlement >50 persons - Economic resettlement >100 pers - Few resettlements (Phys. < 50, economical <100) - No resettlement - unknowns	The Project will not finance any land acquisition. Only land already owned by MEHE or voluntarily donated/transferred to MEHE will be eligible for the Project. The need for physical and economic displacement of persons with and without formal rights will be assessed systematically during site selection and site-specific screening. If physical or economic displacement is identified and cannot be avoided, the site will not be eligible under the Project. Relevant for Site-specific screening
Impacts on Indigenous people	No impacts	- Resettlement of/Impacts on indigenous - No impacts on indigenous - unknown	No Indigenous Peoples, as defined under the applicable E&S standards, are expected to be present in the Project areas.
Impacts on cultural heritage	Unknown Potential impacts are possible (e.g. chance finds)	- Impacts on cultural heritage - Potential impacts on cultural heritage - Historical Cultural sites in close surroundings - No impacts on cultural heritage	Areas with significant and direct impact on cultural heritage will not be eligible for the Project. Potential impacts on cultural heritage sites or resources within or in the vicinity of Project sites (e.g. from construction activities or increased traffic) will be assessed during site-specific screening. During construction cultural heritage might be impacted e.g. in case of chance finds. Chance finds will have to be treated

Social Risks			
		- Unknown	according to national laws. Relevant for site-specific screening and E&S Risk Assessment
Risk of discrimination of vulnerable groups	Impact on vulnerable groups possible	- old people - Children and youth - Women especially (single mothers) - Handicapped or chronical ill - No risk expected	The construction, extension, and rehabilitation of schools may have temporary or longer-term impacts on children and youth, including girls, refugee and other non-Lebanese children, children with disabilities, and other vulnerable groups. Women and other vulnerable members of affected communities may also experience differentiated impacts during Project implementation and operation. Potential impacts on vulnerable groups, including risks of discrimination or unequal access to Project benefits, will be assessed and addressed through site-specific screening and appropriate mitigation measures Relevant for site-specific screening and further E&S risks assessment

Occupational Health and Safety Risks			
	Categorisation	Options to choose from:	Comment
Size of construction site	Expected to be <100 workers per site, to be confirmed through site-specific screening and contractor workforce planning.	- <500 workers with/without camp - >100 workers with camp - 100-500 workers without camp - No large construction site - No construction - unknown	Relevant for site-specific screening and monitoring during construction.
Risk group of employees	Potential risks related to the employment of migrant/refugee, low-income and other vulnerable workers. - Child labor - Occupation of youth (<18) - Forced labor - Migration/low-income worker	- Risk of child labor - Risk of forced labor - >20% Seasonal/Migration Worker - Occupation of youth (<18) - >50% women worker - >29% low-income worker/international and/or national migration workers - >20% indigenous workers - No risk groups - unknown	Relevant for site-specific screening and monitoring of labor and working conditions during construction, including risks related to child labor, forced labor, employment of persons under 18, and migrant/refugee and low-income workers.
Number of permanent employees (relevant for implementation)	To be confirmed	- >4000 - 4000-2000 - 2000-1000 - <200 - Few or none	The number of permanent employees associated with individual interventions is expected to be limited and will be confirmed, as applicable, during implementation.

Occupational Health and Safety Risks			
Risks at the Working place	Works with heavy machinery, electrical works/machinery and works at heights	- Risk due to explosions - Works with hazardous substances - Work with heavy machinery (in-jury, noise, vibration etc. - Electrical works/machinery - Works in heights - Works on contaminated grounds - Work in small spaces (canalization etc.) - No risks	Typical occupational health and safety risks associated with school construction, extension and rehabilitation works are expected, including risks related to heavy machinery, electrical works, work at heights, excavation, construction materials, noise, dust and other site-specific hazards. Relevant for site-specific screening and monitoring of occupational health and safety and labor conditions during construction.

Impacts	
Negative impacts and risks	For most parts temporary, limited to the site and reversible and/or manageable through appropriate mitigation measures.
Cross-border impacts	No cross-border impacts are expected
Cumulative impacts	No significant cumulative impacts are expected, potential cumulative impacts will be considered, where relevant, during site-specific assessment.

Overall Program Categorization	Explanation
B	School Construction, extension and rehabilitation activities generally involve limited to moderate environmental and social risks and impacts. The requirements for environmental assessment under Lebanese law will be determined in consultation with the competent authorities and based on the characteristics of each intervention. In general, the Program is expected to have manageable adverse impacts and risks, which are commonly site-specific, largely temporary and reversible, and can be avoided, minimized or mitigated through measures and standard technological solutions. However, there might be social risks and impacts related to land acquisition and occupational and community health and safety risks, which have to be assessed systematically through site-specific screening and assessment. Even if land acquisition is not financed by the Project, it has to be ensured that land ownership and any previous land donation or other land-related arrangements associated with the Programme comply with applicable E&S requirements and do not result in significant physical or economic displacement. Due to these additional risks, the Project is categorized as a Category B Project. Site-specific environmental and social assessment and management instruments will be prepared, implemented and monitored, as required based on the screening and assessment of each intervention.

Annex 2: E&S Screening Tool for Individual Program Sites and Interventions (Risk Categorisation) and Interventions

A - Project Information

Name of Project Site:	Name
Project Site Location:	Village, district, region, country
Project-Executing Agency	Ministry of Education and Higher Education (MEHE)
Implementing Body:	Contracted construction partner
ESS Supervision:	International/Local Consultant
Description of Project Site:	Describe shortly geographic, physical, biological, geological, hydrological and socio-economic context. Provide information on current use and ownership of land and existing facilities, where applicable.
Project Description:	Infrastructure to be constructed, extended and/or rehabilitated for this Project and its exact location, including associated facilities (temporary such as worker camps and/or permanent such as connecting roads) as relevant. If possible and relevant include a location map. Provide quantitative data (site area, building area, capacity, volume, length, target population etc.) as available and relevant. Provide an overview of the envisaged schedule, stakeholders involved in the project
National EIA category:	EIA, IEE or no E&S assessment required
Checklist filled by:	Name date signature

B - Stakeholder Engagement

Following consultations have been carried out during the site selection and screening phase:

Stakeholders met	Date	Topics
<i>Who?</i>	<i>When?</i>	<i>What?</i>
<i>Add as much lines as necessary</i>		

Following concerns and suggestions were identified within stakeholder engagement and will be considered by MEHE and its contractors:

Concern/Suggestion	Stakeholder	Responses by the Project
<i>What?</i>	<i>Who?</i>	<i>How the project will respond to that</i>
<i>Add as much lines as necessary</i>		

C – Site Screening Checklist

General site characteristics	Possible Options (amend if necessary)	Screening Results and Comments
Of what type is the Project Site?	- New site (green field) - Site expansion - Existing site – rehabilitation - Existing site – extension and rehabilitation	
How is the Project Site currently used?	- Unused/natural state - Agricultural use - Rural landscape/structures - Residential area - Multiple locations/Overall activities - Industrial area - Existing school / Educational facility	
What are estimated land requirements?	- small <1ha - middle 1-5 ha - No additional land required	
Does the Site have any geological, topographical or other characteristics that need special considerations (e.g. high inclination, excavation, unstable earth conditions etc.)	- Yes - No - Unknown	

Environmental and Social Management Framework (ESMF)

Is there any known or suspected presence of unexploded ordnance (UXO) or other explosive remnants of war at or near the Site (e.g. based on site history, conflict-affected status of the area, or local knowledge)? If confirmed or suspected, a chance-find type procedure and coordination with the relevant national authority responsible for UXO clearance shall be applied.	- Yes - No - Unknown	
ESS3: Resource Efficiency and Pollution Prevention		
Is the Site located at immediate vicinity (less than 100m) of water bodies (e.g. river, ponds, lakes) that are reachable by effluent generated by the Project (e.g. such as non-treated waste water, chemicals etc.) during construction and/or operation time?	- Yes - No - Unknown	
ESS6: Biodiversity Conservation and Living Natural Resources		
Is the Site located in or in vicinity of a designated forest, buffer or a protected or naturally valuable area/habitat and might have impacts on this area?	- Project in protected area/habitat - Project in neighborhood of naturally valuable area/habitat - Potential impacts on ecologically valuable areas - No impacts on ecological valuable areas	Sites located within protected area/habitat that are incompatible with the Project's eligibility criteria will not be eligible.

ESS4: Community Health and Safety		
Is the Site located at immediate vicinity (less than 50m) of residential houses, public buildings or other sensitive buildings that are likely to be impacted through construction-related activities (noise, dust, odor, traffic) or site access patterns?	- Yes - No - Unknown	
What risks and impacts are expected for community/residents?	- No risks - Diverse small risks - Diverse medium risks - Diverse higher risks (noise, air, water) - High risks due to explosion/fire - Risk of epidemical diseases - Transport/storage of hazardous/dangerous substance/goods - Significant increase of high-load traffic - High worker influx/migration - Armed security personnel	
Is there a risk that vulnerable groups might be adversely affected by the Project?	- old people - Children and youth - Women including female-headed households - Persons with disabilities or chronic illnesses - Refugees and other vulnerable non-Lebanese persons	

Environmental and Social Management Framework (ESMF)

	- Others - No risk expected	
ESS5: Land Acquisition, Restrictions on Land use and Involuntary Resettlements		
Is the land in MEHE ownership?	- In MEHE ownership - In ownership of the Municipality - In other ownership	
Does the Project foresee voluntary land donation?	- Yes (from Municipality) - Yes (from another authority/person) - No	- Any land donation or other land-related arrangement associated with the Project shall be verified during site-specific screening and shall comply with applicable E&S requirements. The Project will not finance land acquisition.
Will there be physical or economic resettlements necessary due to the change of the land use?	- Phys. Or economical resettlement of persons with informal rights - Physical resettlement >20 persons - Economic resettlement >50 pers - Few resettlements (Phys. < 20, economical <50) - Very few or no resettlement (physical <2, economical <5) - Unknown	- Any physical displacement of households and/or persons will render the site ineligible for the Project. - Any significant economic resettlement or loss of livelihood will render the site ineligible for the Project.
ESS2: Labor and Working Conditions and Occupational Health and Safety		
What is the size of the Construction Site	- >100 workers - 30-100 workers - <30 workers - Workers camp - Workforce staying overnight in the	

Environmental and Social Management Framework (ESMF)

	community - No workers camp	
What will be relevant risk group of employees on the construction site?	- Risk of child labor - Risk of forced labor - >20% Seasonal/Migrant/Refugee Workers - Employment of persons <18 - >50% women workers - >20% low-income worker and/or national/international migration workers - No risk groups - Unknown	
What is the number of permanent employees (relevant for implementation)?	- >100 - 50-100 - 30-49 - <30	
What risks at the working place are to be expected?	- Risk due to explosions - Work with hazardous substances - Work with heavy machinery (injury, noise, vibration etc. - Electrical works/machinery - Work at heights - Work on contaminated grounds - Work in confined spaces (e.g. sewerage/drainage systems etc.) - No risks	

ESS 8: Cultural Heritage		
Are impacts on cultural heritage to be expected?	- Impacts on Cultural Heritage - Potential impacts on cultural heritage - Historical cultural sites in close surroundings - Potential impacts related to chance finds - No impacts on cultural heritage - unknown	- Areas where significant and direct adverse impacts on cultural heritage cannot be avoided will not be eligible for the Project.
Other Social Impacts on local stakeholders	Possible Options (amend if necessary)	Screening Results and Comments
Could the proposed intervention result in the closure or merging of other schools, requiring the redistribution of students and/or school staff?	- Yes - No - Not Applicable - unknown	
If school closure or merging is anticipated, could this significantly increase the distance travelled by affected students to attend school?	- Yes, for a significant part of the students - Yes, but only for a few students - No - Not Applicable - unknown	
Are the local stakeholders informed about the planning regarding the new school construction, extension and/or rehabilitation, and do they support the proposed intervention?	- Yes, the majority of the local stakeholders support the proposed intervention - Yes, but opinions about the proposed intervention are mixed - A significant part of local stakeholders	

Environmental and Social Management Framework (ESMF)

	opposes the proposed intervention. - Unknown	
Will the school serve students from different groups (e.g. in terms of gender, nationality, religion, refugee status or other characteristics) in a manner that could potentially give rise to social tensions, discrimination or exclusion?	- Yes - No - Unknown	
Is the school located in an area where its operation may cause or exacerbate traffic congestion or road safety risks?	- Urban setting - Highly frequented road - Narrow road - Limited space for parking	
Will the school remain operational (occupied by students and/or staff) during construction? If yes, can the renovation or extension works be fully completed within school vacation periods? If not, the additional risk mitigation measures for interaction between workers and students/school staff (including female students and teachers) at occupied school sites, set out in Annex 4, Section D (Generic ESMP Template), shall apply.	- Yes - No - Unknown	

Summary of Risk Screening Results as a basis for Risk Categorization		
Criteria	Questions for screening risk assessment	Overall Assessment of Impacts based on Screening
Significance	Are there only few limited and manageable impacts or are risks diverse, complex and of large scale?	
Regional scale	Are impacts site specific or will they affect a larger area, also beyond the Project Site?	
Reversibility	Will impacts be reversible or will they lead to irreversible changes?	
Duration and frequency	Will impacts be temporary or will they endure? If they are temporary, will they occur repeatedly and if so, in which frequency?	
Importance	Are impacts considered important by MEHE, stake-holders, the public and/or KfW or are they assessed to have minor importance	
Mitigation	Can mitigation measures be easily designed and implemented, using state-of-the-art measures or standard solutions or are mitigation measures un-known and need to be designed with higher effort and resources.	

Overall Program Categorization	Explanation
A, B+ or B	

Risk Matrix as a basis for Risk Categorisation			
Category		Impacts and risks	
A	High Risk	- Diverse significant adverse E&S risks and impacts, because measures are - o of complex nature - o of large scale - o irreversible or unprecedented - o in sensitive location - Affected area is larger than sites of physical works - Measures convert or alter natural habitats, generate significant hazardous materials, or entail major resettlements	Not eligible
B+	Substantial Risk	- Significant risks and impacts in individual areas - o contain a higher risk than B projects - o but less diverse and unprecedented than under A	eligible Scoped ESIA necessary
B	Moderate Risk	- Potential adverse impacts are less adverse, site-specific and in most cases reversible - can be more easily designed and implemented, usually state-of-the-art mitigation measures or standard solutions can be used	eligible Simple Risk Assessment sufficient
C	Low or no Risk	- Minor adverse or no E&S risks and impacts	in general, not applicable for construction works (at least B)

Annex 2b: MoE Screening Form (Annex 4 of Decree 8633/2012)

1. Name of the Project:

2. Project Proponent (owner) information:

- ☐ Name:
- ☐ Address:
- ☐ Telephone number:
- ☐ Fax Number:
- ☐ Email Address:

3. Type of the Project:

- | | |
|---|---|
| ☐ Public | ☐ Agricultural |
| ☐ Private | ☐ Industrial (Specify ISIC code: |
| ☐ Other (specify): | ☐ Touristic (Specify): |
| | ☐ Services (Specify): |
| | ☐ Others (Specify): |

4. Nature of the Project:

- ☐ New Project:

Existing Project/Facility and/or a project that has previously acquired a license and/or previously obtained the approval from MoE.

Which of these activities apply the most?

- ☐ Modification
- ☐ Addition
- ☐ Expansion
- ☐ Rehabilitation
- ☐ Decommissioning/ Closure

5. Project Objectives (please add a brief description of the activities/processes planned to take place)

6. Estimated Cost of the Project:

Capital:

- ☐ Construction:
- ☐ Equipment:
- ☐ Operation:

7. Project time schedule:

	Beginning	End
Planning and Designs		
Construction		
Operation		

8. Required documents:

- ☐ Map showing the location of the project scale 1/20000
- ☐ GPS Coordinates of the location (KMZ files are accepted too)
- ☐ Spatial Map (خريطة مساحة)
- ☐ Register Affidavit (إفادة عقارية)
- ☐ Urban Planning (mapping and concordance certificate) with the area's specific planning conditions (إفادة ارتفاق وتخطيط ومرسوم الشروط الخاصة للمنطقة)

9. Other Documents (optional): Detailed project design and description if available.

N.B: The Ministry of Environment reserves the right to request additional documents when deemed necessary.

Annex 3: E&S Assessment Check List for Construction Sites (categorized as B)

The Site E&S Assessment Checklist is intended to be used by MEHE to quickly assess relevant E&S risks at project sites categorized as B and help identify the applicable mitigation measures. The Checklist provides specific reference to sections of the ESMP template table in Annex 4, which can potentially be triggered if the specific risk has been identified. Thus, the checklist support to adapt and amend the ESMP template (in Annex 4) to reflect the site-specific conditions.

SITE E&S ASSESSMENT CHECKLIST

A - Project Information

<i>Name of Project Site:</i>	Name	
<i>Project Site Location:</i>	Village, district, region, country	
<i>Project-Executing Agency</i>	Ministry of Education and Higher Education (MEHE)	
<i>Implementing Body:</i>	Contracted construction partner	
<i>ESS Supervision:</i>	International/Local Consultant	
<i>Description of Project Site:</i>	Describe shortly geographic, physical, biological, geological, hydrological and socio-economic context. Provide information on current use and ownership of land	
<i>Project Description:</i>	Infrastructure to be built for this Project and its exact location, including associated facilities (temporary such worker camps and/or permanent such as connecting roads) as relevant. If possible and relevant include a location map. Provide quantitative data (volume, length, target population etc.) as available and relevant Overview of the envisaged schedule, stakeholders involved in the project	
<i>National EIA category:</i>	EIA, IEE or no E&S assessment required	
<i>Project Stage:</i> ☐ <i>Planning</i> ☐ <i>Construction</i> ☐ <i>Operation</i>		
<i>Permitting Obligations Associated with this Project</i> List all permits that need to be granted by the Lebanese administration to authorize the project, provide status of the document (incl. if the obligation has been lifted) and information of steps to be taken to receive authorization to implement the project – if any		
Document	Status	Actions
e.g. EIA or IEE	submission of screening application form to MoE	
e.g. water discharge permit	Granted	None
<i>Checklist filled by:</i>	<i>Name date signature</i>	

B - Stakeholder Engagement

Following consultations have been carried out during the site selection and screening phase:

Stakeholders met	Date	Topics
<i>Who?</i>	<i>When?</i>	<i>What?</i>
<i>Add as much lines as necessary</i>		

Following concerns and suggestions were identified within stakeholder engagement and will be considered by MEHE and its contractors:

Concern/Suggestion	Stakeholder	Responses by the Project
<i>Who?</i>	<i>When?</i>	<i>How the project will respond to that</i>
<i>Add as much lines as necessary</i>		

C - Checklist**Part 1 – Project Area Baseline Characteristics**

Question	Answer	Small Works ESMP Reference	Possible risks to consider / Guidance	Comments
Is the site located on an inclined area?	☐ Yes ☐ No ☐ Unknown	B.19 – erosion control measures	Inclined area is a factor that may trigger soil erosion.	<i>Provide here:</i> <i>additional details that support the assessment</i> <i>missing elements</i> <i>documentary evidence</i> <i>possible action/mitigation to be considered etc.</i>
Is vegetation present in the Project Area that will need to be cleared/removed for the purpose of the Project?	☐ Yes ☐ No ☐ Unknown	B.17 – vegetation clearing B.20 – revegetation	Methods of vegetation clearing can be harmful for the environment, biodiversity and habitat of fauna can be impacted.	
Is the Project Area prone to impacts of natural disasters such as: storm surges, fire, flooding or earthquakes?	☐ Yes ☐ No ☐ Unknown	C.31 – emergency prevention	The Project needs to consider impacts of natural disasters and adopt a design that would minimize those impacts.	
Is the Project Area prone to be impacted by climate change such as sea-level rise; drought, heat?	☐ Yes ☐ No ☐ Unknown	C.31 – emergency prevention	The Project needs to consider impacts by climate change and adopt a design that would minimize those impacts.	

Question	Answer	Small Works ESMP Reference	Possible risks to consider / Guidance	Comments
Is the Site located at immediate vicinity (less than 50 m?) of residential houses, public building such as medical center, school / educational infra-structures or other sensitive building that is likely to be impacted through construction activities (noise, dust, odor, traffic) or Site access patterns.	☐ Yes ☐ No ☐ Unknown	B.10 – protection of ad-jacent areas D.47 – community inter-action	Constructions activities may result in disturbances for communities and sensible human receptors, so that disturbances should be at possible extent reduced at sources. If not possible the works have to be organized in a way that disturbances are minimized. In any case interaction with communities is required to find the best solution	
Is the Site located at immediate vicinity (less than 100 m?) of water bodies (e.g. rivers, ponds, lakes) that are reachable by effluent generated by the Project during construction and/or operation time (effluents such as non-treated waste waters, chemicals, etc.)	☐ Yes ☐ No ☐ Unknown	B.12 – pollution prevention B.13 – effluents	Construction activities may cause pollution of water bodies, resulting in adverse impacts for flora and fauna as well as communities. Construction activities need to mitigate, minimize and avoid all pollution.	
Are any valuable groundwater or drinking water resources known to be present within the Project Area?	☐ Yes ☐ No ☐ Unknown	B.12 – pollution prevention B.13 – effluents	Competition for water resources be-tween Project and communities Contamination of waters by effluents during construction and/or operation.	

Question	Answer	Small Works ESMP Reference	Possible risks to consider / Guidance	Comments
Is the Project Area fully or partly located within or at immediate vicinity of national or international recognized natural protected area?	☐ Yes ☐ No ☐ Unknown	B.18 – areas of ecological value	Depending on the nature of the protection and of the type of project, the construction activities may directly affect the protected areas or indirectly lead to pressure on protected resources (for in-stance, temporarily due to increase in-flux of workers or permanent due to increased traffic on a long term)	
Is the Site exposed with no natural structures to provide shade or wind protection?	☐ Yes ☐ No ☐ Unknown	C.40 – provision of H&S facilities	If the site is exposed to heat and extreme weather conditions, health of workers at the site may be endangered and protection (shelter) for resting time needs to be ensured.	
Is it likely that the Project will impact or restrict access to cultural or religious sites such as graves, sacred sites, religious sites, historical or archaeological sites?	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action D 51 - Chance find	Impacting or restricting access to cultural sites may jeopardize acceptance of the project. It is necessary to consider those at planning stage.	
Are there local communities known within the Project Area that rely on land or resources that will be permanently or temporarily impacted through construction activities (e.g. agricultural land; water bodies; forests; etc.)	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action D.49 – land take	If the Project restrict access to the resources, provision of suitable alternative livelihood to the affected persons will need to be considered.	

Environmental and Social Management Framework (ESMF)

Question	Answer	Small Works ESMP Reference	Possible risks to consider / Guidance	Comments
Are there socio-cultural groups present within the Project Area who may be considered as "tribes" (hill tribes, scheduled tribes, tribal peoples), "minorities" (ethnic or national minorities), or "indigenous communities"?	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action	Indigenous communities (and other groups considered as “tribes” and “minorities”) can have specific vulnerabilities. The Project needs to consider the specific needs to ensure these groups are not worse off due to the activities.	
Do access roads cross community settlements?	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action D.50 – traffic management	Restrictions on access of land can have significant impacts on the acceptance of the project as well as cause safety risks given increased traffic.	
Is the ownership status and current usage of land to be acquired known?	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action D.49 – land take	The Program will not finance land acquisition. If screening identifies a need for land acquisition or physical or economic displacement that cannot be avoided, the proposed site/intervention will not be eligible under the Program.	
Will there be loss of shelter and residential land (permanent or temporary) due to land acquisition?	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action D.49 – land take	See above	
Will there be loss of income sources (e.g. assets such as crops, trees) and means of livelihoods (permanent or temporary) due to land acquisition?	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action D.49 – land take	See above	

Environmental and Social Management Framework (ESMF)

Question	Answer	Small Works ESMP Reference	Possible risks to consider / Guidance	Comments
Are transport routes or facilities used by the local communities impacted through construction activities?	☐ Yes ☐ No ☐ Unknown	D.50 – traffic management	Project needs to ensure that community exposure to project-related traffic and road safety risks is avoided and minimized.	
Is the Site frequently traversed or used by people from the nearby communities?	☐ Yes ☐ No ☐ Unknown	D.48 – site security		

Part 2 – Project Features

Question	Answer	Small Works ESMP Reference	Possible risks to consider	Comments
Are water abstractions planned from surface or groundwater bodies within the Project Area?	☐ Yes ☐ No ☐ Unknown	D.47 – local livelihoods	Provide safeguards to prevent competition for water resources between Project and communities.	
Will natural resources (e.g. timber; water, sand, quarries) within the Project Area be used for construction activities in a significant quantity?	☐ Yes ☐ No ☐ Unknown	D.47 – local livelihoods	Provide safeguards to prevent competition for water resources between Project and communities.	
Are access roads unpaved (i.e. dirt roads) and/or will there be temporary dirt roads built for construction activities?	☐ Yes ☐ No ☐ Unknown	B.14 – dust emissions D.50 – traffic management	Paved road construction may constitute a risk for emissions and disturbances for populations.	
Are any of the following activities planned within the Project Area? • earthworks; • excavations/topsoil removal; • borrow areas; • stockpiles; • storage facilities (e.g. tanks, silos).	☐ Yes ☐ No ☐ Unknown	B.11 - borrow areas, stockpiles B.13 – effluents B.19 - topsoil removal D.51 – chance finds		

Environmental and Social Management Framework (ESMF)

Question	Answer	Small Works ESMP Reference	Possible risks to consider	Comments
Will construction activities result in production of solid waste that need special treatment, such as hazardous waste, packaging, etc.	☐ Yes ☐ No ☐ Unknown	B.16 – waste	Contamination of environment through inadequate disposal and/or public health risks, e.g. through reuse of packaging.	
Will construction involve use, storage (e.g. tanks; refueling stations), transport and handling of substances with potential harm to human health or the environment (i.e. hazardous materials; contaminants; fuels; oils)?	☐ Yes ☐ No ☐ Unknown	A.8 – ESHS Training B.12 – pollution prevention B.13 – effluents B.16 – waste C.24 – accident reporting C.28 - PPE C.31 – emergency prevention C.33 – first aid	Contamination of environment and safety risk of human health through inadequate handling of substances.	
Will construction activities result in the production of wastewater streams?	☐ Yes ☐ No ☐ Unknown	B.13 – effluents	Contamination of environment through inadequate disposal.	
Are there potentially unsafe elements present at the Site or planned to be constructed, such as pits, ponds, ditches, trenches, holes, scaffolds, etc.	☐ Yes ☐ No ☐ Unknown	C.24 – accident reporting C.33 – first aid D.48 – site security	Safety risk (slips, fall) for the public and other non-workers accessing the site, such as children.	

Environmental and Social Management Framework (ESMF)

Question	Answer	Small Works ESMP Reference	Possible risks to consider	Comments
Are the construction works located within an area that is frequented by public?	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action C.24 – accident reporting C.33 – first aid	Risks of accidents through intrusion of the public on the construction site. Ensure that site areas are provided with appropriate security, access restriction, sign-age and lighting.	
Will the project engage security personnel to be present at the Site during construction activities?	☐ Yes ☐ No ☐ Unknown	A.7 – Code of Conduct A.8 – ESHS Training C.40 – communicable diseases D.48 – damage to people and property	Risk of abuse of security personnel toward public and communities if the security personnel are not appropriately trained	
Is the workforce staying overnight in the communities?	☐ Yes ☐ No ☐ Unknown	A.7 – Code of Conduct D.47 – community inter-action		

Environmental and Social Management Framework (ESMF)

Question	Answer	Small Works ESMP Reference	Possible risks to consider	Comments
Does the Project need land acquisition? If there is land acquisition, which will apply? ☐ loss of shelter and residential land (permanent or temporary) ☐ loss of income sources (e.g. as-sets such as crops, trees) and means of livelihoods (permanent or temporary) ☐ loss of access to natural re-sources ☐ loss of access to communal facilities and services - none of the above	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action D.49 – land take	Project-related land acquisition or restrictions on land use may cause significant adverse impacts due to loss of livelihoods, this can significantly reflect on the Project acceptance of communities. The Program will not finance land acquisition; therefore, any need for land acquisition identified during screening shall be assessed against the Program eligibility criteria and applicable E&S requirements.	
Does the Project foresee voluntary land donation?	☐ Yes ☐ No ☐ Unknown	D.47 – community inter-action D.49 – land take	Any previous or proposed voluntary land donation associated with a Project site shall be verified to ensure that it was or is genuinely voluntary, free of coercion or undue pressure, appropriately documented, and consistent with applicable E&S requirements.	

Part 3 – Working Conditions

Question	Answer	Small Works ESMP Reference	Possible risks to consider	Comments
Does the Project ensure that all per-sons working for the Project; including persons directly employed or contracted; work according to ILO or national standards working hours rules (whatever the most stringent)?	☐ Yes ☐ No ☐ Unknown	D.42 – labor standards	Regular working hours as per ILO ²⁶ are limited to 8 hours a day / 48 hours per week. These limits may be exceeded only under the exceptions provided for under applicable ILO standards and national legislation. Overtime shall be appropriately compensated.	
Does the Project ensure that all persons working for the Project; including persons directly employed or contracted as well as community labor are above minimum age?	☐ Yes ☐ No ☐ Unknown	D.42 – labor standards	The minimum age for employment or engagement under the Project is 18 years. Contractors shall verify the age of all workers prior to employment or engagement through appropriate identification documents and maintain records of such verification.	
Does the Project ensure that all per-sons working for the Project; including persons directly employed or contracted as well as community labor are working on free basis and not un-der any form of coercion?	☐ Yes ☐ No ☐ Unknown	D.42 – labor standards	The employer shall not retain wages, benefits, property or identity documents to force personnel to work. Workers shall have the right to leave the workplace after completing their working hours and to terminate their employment in accordance with applicable contractual and legal requirements.	

²⁶ C001 - Hours of Work (Industry) Convention, 1919 (No. 1) - https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C001

Environmental and Social Management Framework (ESMF)

Question	Answer	Small Works ESMP Reference	Possible risks to consider	Comments
Does the Project intend to employ community labor?	☐ Yes ☐ No ☐ Unknown	A.7 – Code of Conduct D.42 – labor standards D.43 – local recruitment D.44 – transport D.47 – community inter-action D.48 – damage to people and property	Community work if used is only to be performed on voluntary basis, with free and informed consent of the workers, and without coercion. Applicable labor and working condition requirements shall also apply to community workers.	
Will temporary worker accommodation be erected on Site?	☐ Yes ☐ No ☐ Unknown	C.33 – first aid C.40 – accommodation C.40 – communicable diseases C.41 – substance abuse D.48 – damage to people and property	Worker's accommodation needs to be managed through adequate policies to ensure the health, safety and well-being of workers, including the consideration of social and cultural needs.	
Is worker influx of more than 100 workers to the Project Area expected due to the demand for construction workforce?	☐ Yes ☐ No ☐ Unknown	A.7 – Code of Conduct C.40 – communicable diseases D.42 – labor standards D.43 – local recruitment D.44 – transport D.47 – community inter-action D.48 – damage to people and property	Community and workers' health, safety and wellbeing need to be protected by the Project.	

Environmental and Social Management Framework (ESMF)

Question	Answer	Small Works ESMP Reference	Possible risks to consider	Comments
Does the Project include works at height (above 1m such as construction of roofs, pylons, trees cutting, use of scaffoldings, etc.?)	☐ Yes ☐ No ☐ Unknown	A.8 – ESHS Training C.24 – accident reporting C.31 – emergency prevention C.33 – first aid	Risks linked with work at heights shall be assessed and minimized through appropriate fall-prevention and fall-protection measures, including safe scaffolding, guardrails and appropriate PPE/fall-arrest systems, as applicable.	
Does the Project include works underground (trenches, pit digging or similar) below 1m deep?	☐ Yes ☐ No ☐ Unknown	A.8 – ESHS Training C.24 – accident reporting C.31 – emergency prevention C.33 – first aid	Excavation-related risks, including collapse, falls, hazardous atmospheres and contact with underground services, shall be assessed and controlled through appropriate protective systems, safe access and egress, inspections, barriers and other measures appropriate to the excavation.	
Will heavy machinery (e.g. excavators, cranes, trucks, jackhammers) be used for construction activities?	☐ Yes ☐ No ☐ Unknown	A.8 – ESHS Training B.12 – pollution prevention B.15 – noise and Vibrations C.24 – accident reporting C.28 – PPE C.33 – first aid C.31 – emergency prevention C.33 – first aid	To prevent accidents heavy machinery shall be operated only by appropriately trained and authorized personnel, with appropriate exclusion zones, traffic controls, signaling/spotters and other safety measures implemented as required.	

Environmental and Social Management Framework (ESMF)

Question	Answer	Small Works ESMP Reference	Possible risks to consider	Comments
Will the work include activities in confined spaces such as pits, septic tanks etc.?	☐ Yes ☐ No ☐ Unknown	A.8 – ESHS Training C.24 – accident reporting C.31 – emergency prevention C.33 – first aid	Confined-space work shall be subject to appropriate risk assessment and control measures, including authorization/permit procedures, atmospheric testing where required, safe access and egress, appropriate PPE, supervision and emergency/rescue arrangements.	
Will the Project activities involve the handling of hazardous materials/contaminants?	☐ Yes ☐ No ☐ Unknown	A.8 – ESHS Training C.24 – accident reporting C.31 – emergency prevention C.33 – first aid	Hazardous materials shall be identified, stored, handled, transported and disposed of in accordance with applicable requirements and manufacturer safety information. Workers handling hazardous materials shall receive appropriate training, PPE and access to relevant safety information.	

Annex 4: ESMP Template**A - Project Information**

Name of Project Site	Name		
Project Site Location:	Village, district, region, country		
Project-Executing Agency	Ministry of Education and Higher Education (MEHE)		
Implementing Body:	Contracted construction partner		
ESS Supervision:	International/Local Consultant		
Description of Project Site:	Describe shortly geographic, physical, biological, geological, hydrological and socio-economic context. Provide information on current use and ownership of land		
Project Description:	Infrastructure to be built for this Project and its exact location, including associated facilities (temporary such worker camps and/or permanent such as connecting roads) as relevant. If possible and relevant include a location map. Provide quantitative data (volume, length, target population etc.) as available and relevant. Overview of the envisaged schedule, stakeholders involved in the project.		
National EIA category	EIA, IEE or no further environmental assessment required under Decree No. 8633/2012, as determined by MoE		
Project Stage: ☐ Planning ☐ Construction ☐ Operation			
Permitting Obligations Associated with this Project List all permits that need to be granted by the Lebanese administration to authorize the project, provide status of the document (incl. if the obligation has been lifted) and information of steps to be taken to receive authorization to implement the project – if any			
Document	Status	Actions	
e.g. EIA or IEE	submission of screening application form to MoE		
e.g. water discharge permit	Granted	None	
Checklist filled by:	Name date signature		

B - Stakeholder Engagement

Following consultations have been carried out during the site selection and screening phase:

Stakeholders met	Date	Topics
<i>Who?</i>	<i>When?</i>	<i>What?</i>
<i>Add as much lines as necessary</i>		

Following concerns and suggestions were identified within stakeholder engagement and will be considered by MEHE and its contractors:

Concern/Suggestion	Stakeholder	Responses by the Project
<i>What?</i>	<i>Who?</i>	<i>How the project will respond to that</i>
<i>Add as much lines as necessary</i>		

C - Principles of Project Planning

The Project will be planned and designed by MEHE with the following basic considerations:

- Ensure a transparent and data-driven site selection process
- Do not finance land acquisition. Avoid sites involving physical or economic displacement or other significant land-related impacts, in accordance with the Program eligibility criteria and applicable E&S requirements.
- Avoid forests, protected areas or ecologically sensitive areas.
- Avoid culturally sensitive areas (e.g. places of worship, holy trees).
- Design the Project to:
 - Ensure that key/ routine maintenance and operations can be implemented by the by the responsible school/MEHE personnel, as applicable. .
 - Apply low-maintenance solutions in the design of buildings, e.g. based on other buildings of the same type in the region.
 - Account for proper ventilation and adequate resistance to severe weather or natural disasters.
 - If feasible, develop a maintenance plan with the beneficiaries of the building.
- Plan the Project to make use of local resources to avoid construction traffic and associated impacts to the communities.
- Plan the Project so as to minimize use of natural resources (material, water, land).
- Plan the Project in a climate-friendly way so as to minimize its carbon footprint and tap into the mitigation potential of the building and construction industry.
- Engage with the persons living in the area around the Project site (including neighbors, local decision makers) early in the planning process and throughout construction activities to inform them about the planned construction and also seek for their feedback around potential sensitivities (protected areas, places of worship, holy trees etc.). Site visits and discussions with the local population should be conducted throughout the design and planning phase. A grievance mechanism will be designed and established for workers and the public during the planning phase already.
- Encourage the recruitment of qualified unskilled and skilled workers from local communities, where available and consistent with applicable recruitment procedures and labor requirements.
- Ensure that E&S and OHS induction training is provided to all workers before they commence work.
- Establish core E&S procedures already at the planning stage. This includes as a minimum:
 - Incident Reporting (fatal accidents, medical treatment cases; first aid cases; restricted work injuries; near misses; environmental events)
 - Grievance Mechanism for Project-affected persons and a worker grievance mechanism for Project workers, with appropriate procedures and channels for each.
 - Recruitment Procedure for the upcoming construction phase.

- Training Procedures/ Training material as outlined above (Occupational H&S; Community H&S; environmental sensitivities)
- Work site/ construction site risk assessment and corresponding Occupational Health and Safety (OHS) Plan, as part of the Contractor's C-ESMP.

D - Generic ESMP Template

This section provides best practice measures usually to be applied for small and medium-scale buildings and infrastructure projects. Not all the aspects, impacts and mitigation measures out-lined may be relevant for each project due to the regional context, the seasonality and project specifications. Deleting mitigation measures should, however, only be done with a thorough justification. Additional measures may be added as needed.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
A. General Requirements for ESHS Management				
1. Responsibilities and Liabilities	Ensure that all workers, suppliers and possible subcontractors are informed of and comply with the applicable ESHS requirements and the site-specific ESMP/C-ESMP.	Induction training performed and recorded. Contracts with Subcontractors and Suppliers	Contractor	Review of training records Review of Contracts to ensure that project requirements are included Monitoring of Contractor compliance by the IC, with overall oversight by MEHE.
	Prepare and implement the Contractor's Environmental and Social Management Plan (C-ESMP), based on the site-specific ESMP and contractual ESHS requirements, and define the applicable monitoring frequencies. Prepare any additional management plans required under the site-specific ESMP, bidding documents or contract.	Approved C-ESMP and associated management plans (if any)	Contractor	Review and approval prior to commencement of the relevant works, and monitoring during implementation with MEHE oversight; monitoring of implementation throughout construction.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
2. Resources allocated to ESHS Management	Assign qualified ESHS personnel in accordance with the contractual requirements, with clearly defined roles and responsibilities, including responsibility for stakeholder/community liaison, as applicable.	Designation/appointment records for the required ESHS personnel; defined roles and responsibilities; evidence of personnel mobilization	Contractor	Verification by the IC prior to commencement of works and monitoring of the continued availability of the required ESHS personnel during construction, with MEHE oversight.
3. Reporting	Report on ESHS performance and implementation of the C-ESMP, including incidents and accidents, near misses, non-compliances, corrective actions, grievances and other relevant ESHS matters, in accordance with the contractual reporting requirements.	Monthly ESHS reports, incident/accident reports and related ESHS records	Contractor	Review of ESHS reports and records by the IC; verification and follow-up of non-compliances and corrective actions during site supervision, with MEHE oversight.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
4. Code of Conduct	Establish a Code of Conduct taking into consideration legislation, safety rules, substance abuse, environmental sensitivity, communicable diseases, gender issues (sexual harassment), respect for local beliefs and customs, community interactions etc.	Code of Conduct in place and rules shared with personnel Signed Codes of Conduct maintained for relevant personnel	Contractor	Review of Code of Conduct Induction records Review of re-reported mis-conduct behaviour Review of grievance records Verification by the IC during site supervision, with MEHE oversight.
5. ESHS Training	Provide E&S and OHS induction, training and awareness raising to all workers, including subcontractor personnel, appropriate to their tasks and the Project's ESHS risks and requirements.	Training performed and recorded	Contractor	Review of training records and verification by the IC during site supervision, with MEHE oversight.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Specific Requirements for ESHS Management				
B-1. Protection of the Environment and People				
6. Protection of adjacent areas	Restrict excavation activities during periods of intense rainfall. Use temporary bunding to reduce the risk of sediment, oil or chemical spills to the receiving waters.	No excavation during intense rainfall	Contractor	Check weather fore-cast and inspect the site conditions prior to excavation. Verification by the IC during site supervision.
	Carry out excavation works in cut off ditches to prevent water from entering excavations.	No water entering excavations	Contractor	Random site inspection by the IC.
	Ensure that means of protection are in place to avoid or minimize adverse effects on vegetation, soils, groundwater and surface water, biodiversity, natural drainage and the water quality in areas within the works area. Use construction methods that minimize impacts to the extent possible -	No impacts identified in the adjacent environment	Contractor	Regular monitoring of adjacent natural resources by the Contractor and verification by the IC during site supervision.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Ensure that work site boundaries and limits are in accordance with plans agreed upon in advance. All construction activities should be carried out within boundaries.	Marking the borders of works site boundaries and usage of warning signs	Contractor	Site inspection prior to commencement of activities and periodic verification by the IC during construction.
	Ensure to stay out of surrounding wetland areas.	Pre construction survey to make sure that site is not in wetland areas	Contractor	Verification during site screening and selection.
	Ensure to keep the following distances from permanent water course and out-side of floodable areas; sensitive urban services and buildings (health centre, school, water supply for populations); any housing;	Marking the borders of works site boundaries in line with given limits and usage of warning signs	Contractor	Site inspection prior to commencement of activities and verification by the IC during site supervision.
	After construction, form reshaped land so that it is inherently stable, adequately drained and suitable for the desired long-term land use and allows natural regeneration of vegetation	Visual inspection and comparison with adjacent un-disturbed areas.	Contractor	Regular monitoring by the Contractor and verification by the IC.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Minimize visual impacts	Visual inspection and comparison with adjacent un-disturbed areas.	Contractor	Review of grievance records and verification by the IC during site supervision.
7. Selection of borrow areas, backfill material stockpile sites and access road	Select borrow areas or areas to be excavated, backfill material stockpile locations and access roads if applicable to the project.	Designated areas selected	Contractor	Review of proposed borrow areas, stockpile locations and access arrangements by the IC prior to their use and monitoring during construction, as applicable.
	Locate stockpile areas in areas where trees can act as buffers to prevent dust pollution where appropriate, while avoiding damage to existing vegetation and ecologically sensitive areas.	Designated areas selected	Contractor	Review of proposed stockpile locations by the IC prior to their use and verification during site supervision.
	Deposit any excess material in areas approved by local authorities	Evidence of approval/authorization of disposal location and disposal records, as applicable.	Contractor	Verification of approved disposal locations and periodic review of disposal records by the IC.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Locate disposal site on low value land and in areas approved for disposal, avoiding environmentally or socially sensitive areas.	Designated areas selected	Contractor	Review of proposed disposal location by the IC prior to its use and verification during construction.
8. Pollution prevention	Ensure all works carried out minimize pollution risk (e.g. liquid effluents; air emissions; noise and vibration management; vehicle and equipment maintenance and selection; fuel, oil and chemical storage and handling) including the whole duration of the project throughout the construction period.	Ensure that potential pollutants are not stored and handled within 50 meters of sensitive receptors (particularly water courses).	Contractor	Regular site inspection by the Contractor and verification by the IC during site supervision. Review of grievance records
	Ensure appropriate and safe storage and handling of fuels, oils, chemicals and other hazardous or potentially polluting materials, including appropriate secondary containment and spill-prevention measures.	Designated storage areas; appropriate secondary containment; spill response procedure; spill response and remediation equipment available on site	Contractor	Regular site inspection by the Contractor and verification by the IC during site supervision.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
9. Effluents	Ensure appropriate containment and management of construction wastewater, including sanitary waste water. No untreated waste water shall be discharged into the environment.	No untreated wastewater discharge observed; Appropriate wastewater containment and disposal arrangements in place	Contractor	Regular site inspection by the Contractor and verification by the IC during site supervision Review of grievance records
10. Emissions and dust	Use to the extent possible, vehicles and equipment in appropriate operating conditions. Provide emissions control equipment where applicable (e.g. filters).	Technical Specification and equipment in appropriate operating condition. Provide emission-control equipment where applicable.	Contractor	Prior to commencement of works and each time new equipment/vehicle is used at the site. Periodic verification by the IC during site supervision. Review of grievance records Visual inspection on regular basis
	Use low sulphur content fuels, in line with legal provisions in force as well as local availability.	Technical Specification Sheet / fuel specifications, as applicable	Contractor	Regular documentation inspection.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Ensure vehicles and equipment are switched off when not in use. Sensitize drivers.	Engines switched off when not in use; Driver induction/training records	Contractor	Site inspection and verification by the IC during site supervision.
	Apply good practice measures to minimize dust emissions, including appropriate stockpile management, watering as necessary during dry and windy conditions, and covering or otherwise controlling dusty materials during transportation.	Watering conducted as required; Stockpiles and transported materials appropriately managed; No excessive dust emissions are observed	Contractor	Regular site inspection by the Contractor and verification by the IC during site supervision. Review of grievance records.
	Ensure speed limits on site. Sensitize drivers.	Speed signs in-stalled Training performed and recorded Accident/incident	Contractor	Random site inspection by the IC Review of grievance records Review of accident/incident records Review of training records

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
		reports		
11. Noise and vibration	Avoid operations and vehicle movements at night and schedule noisy activities during daytime hours, to the extent practicable.	No work conducted between 10pm and 7 am/ unless specifically authorized; work schedules/records	Contractor	Random site inspection by the IC Review of grievance records Review of work schedules and records, as applicable.
	Set traffic speed limits. Sensitize drivers.	Speed limit signs Driver Training Records as part of Induction training	Contractor	Random site inspection by the IC Review of grievance records Review of accident/incident records Review of training records

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Locate stationary equipment (such as power generators) as far as possible from nearby receptors (e.g. worker resting areas, populated areas and environmentally sensitive areas). Use appropriate noise-control measures, such as acoustic enclosures, barriers or silencers, where necessary, and ensure compliance with applicable noise limits.	Distances between equipment and receptors are kept Noise-control measures installed where required; noise monitoring records, where applicable.	Contractor	Verification by the IC prior to or at commencement of relevant activities and during site supervision. Noise monitoring where necessary, particularly following complaints or where significant noise impacts are anticipated. Review of grievance records
12. Waste	Identify appropriate waste management facilities and waste management contractors. Ensure disposal through waste contractors authorized/licensed as applicable for the collection, transport, treatment, recycling and/or disposal of the relevant waste types.	Waste management through authorized/licensed contractors, as applicable. Waste management contracts Waste transfer notes	Contractor	Verification of waste facilities and contractors by the IC, as applicable. Proof of contractors' authorizations/licenses Review of waste transfer records

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Ensure that all wastes produced are properly collected, segregated, stored, transported and treated or disposed of according to the type of waste and applicable requirements.	Designated and appropriately managed waste collection areas. Waste inventories Waste transfer notes	Contractor	Random site inspection by the IC. Review of waste inventories. Review of waste transfer records.
	Minimize the waste production to the extent possible and promote reuse and recycling where feasible and appropriate.	Records of waste production are kept Waste Management Plan Training performed and recorded	Contractor	Monitor (e.g. monthly) the amount of waste produced. Review by the IC of waste records and implementation of the Waste Management Plan. Review of training records.
	Document all waste related operations (type of wastes, quantities produced etc.) including their collection, transport, reuse/recycling, treatment and/or final disposal, as applicable.	Storage, transport and treatment/disposal of waste is documented Waste transfer notes Waste inventories	Contractor/ MEHE	Review of waste transfer records by the IC. Review of waste inventories.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
13. Vegetation clearing	Limit vegetation clearing to areas within the site boundary where it is strictly necessary.	Vegetation clearing minimal Marking the borders of works site boundaries	Contractor/ MEHE	Site inspection prior to commencement of activities and verification by the IC during site supervision.
	Describe the methods of vegetation clearance. Ensure that no chemicals/pesticides are used and that burning of cleared vegetation is prohibited unless specifically authorized in accordance with applicable requirements. Do not clear vegetation more than two months in advance of operations.	No use of fires or chemicals on site Marking the borders of works site boundaries Usage of warning signs	Contractor/ MEHE	Site inspection prior to commencement of activities. Site inspection during site clearance by the IC.
	Avoid clearing mature trees and protected, threatened or endangered plant species.	No mature trees or protected, threatened or endangered plant species cleared unless specifically authorized in accordance with applicable requirements.	Contractor	Site inspection prior to commencement of activities and verification during site clearance by the IC.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
14. Biodiversity	Avoid to the extent possible areas of ecological value during site selection and design.	Areas of ecological value avoided	MEHE/IC	Site assessment prior to site selection. Ecological value assessment if needed.
	Avoid disturbance of natural habitats and minimize unavoidable impacts.	No habitats disturbed or evidence that unavoidable impacts have been appropriately managed.	Contractor/ MEHE	Inspection of construction practices by the IC during site supervision.
15. Erosion and sediment transport	If construction takes place on inclined surfaces/slopes, ensure preventive erosion control measures are applied (e.g. plan to retain trees and other vegetation, use of natural contours for roads and drainage networks, excavated drainage channels) and appropriate sediment-control measures, as required.	Preventive temporary and permanent erosion and sediment control measures in place Landscape and Bio-restoration plan in place where required	Contractor	Random site inspection by the IC to verify implementation and effectiveness of erosion and sediment-control measures, particularly following heavy rainfall.
	Ensure that topsoil is stripped and stored properly. After construction, topsoil will be used for restoration of the area. Topsoil should not be	Topsoil stored and re-used for restoration.	Contractor	Site inspection by the IC to verify that topsoil is properly stripped, separately stored and reused for restoration, as

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	mixed with subsoil, and shall therefore be stored separately.			applicable
	Ensure appropriate stockpiling to maintain stability and minimize erosion, sediment runoff and dust.	Stockpile height limited and stockpiles appropriately located and managed.	Contractor	Random site inspection by the IC
16. Site rehabilitation	Ensure revegetation and restoration of cleared areas where possible after construction using native species.	Revegetation completed	Contractor	One-time inspection after construction by the IC and follow-up where restoration is incomplete or unsuccessful.
	Ensure that rehabilitated areas don't pose health and safety risks (such as holes, ponds).	Reinstatement completed	Contractor	Inspection after construction by the IC. Additional Inspection following significant rainfall or other events where necessary
	Reinstatement of construction working area to the extent practicable to its pre-construction condition or another condition agreed with MEHE, after construction activities are completed.	Reinstatement completed	Contractor	One-time inspection after construction by the IC. Additional Inspection following significant heavy rain-falls rainfall or

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
				other events where necessary.
	Rehabilitate borrow areas, backfill material stockpile sites and access roads, where applicable.	Rehabilitation completed	Contractor	One-time inspection after construction by the IC Additional Inspection following significant heavy rain-falls or other events where necessary.
B2- Health and Safety				
17. Health and Safety Plan	Develop and implement a site-specific Occupational Health and Safety (OHS) Plan as part of the C-ESMP, proportionate to the activities and risks of the works.	Approved OHS Plan included in the C-ESMP; evidence of implementation	Contractor	Review of the OHS Plan by the IC prior to commencement of works and verification of its implementation during regular site supervision
18. Accident reporting procedure	Ensure all OHS incidents and accidents, including near misses, are recorded, reported, investigated and followed up with appropriate corrective and preventive actions in accordance	Incident/accident register; incident reports; investigation records; corrective and	Contractor	Review of incident/accident records and follow-up of corrective and preventive actions by the IC, with MEHE oversight.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	with the contractual incident-reporting requirements.	preventive action records		
19. Personal protective equipment	Ensure the provision and proper use of appropriate PPE by all workers, based on the hazards associated with their tasks (e.g. hard hats, safety footwear, gloves, eye/face protection, hearing protection, respiratory protection and fall-protection equipment, as applicable). PPE shall be provided to workers at no cost.	PPE available and properly used on site. PPE issuance record Training performed and recorded	Contractor/Site Manager	Random site inspection by the Contractor/Site Manager and verification by the IC during site supervision. Review of PPE and training records
20. Emergency scenarios prevention	Ensure immediate containment and cleaning of any spills and remediation of contaminated areas as required.	Workers trained. Spill response procedure and appropriate spill-response equipment available on site.	Contractor	Inspection following spill events and verification of clean-up/remediation by the IC. Review of spill/incident records and training records.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Provide necessary emergency prevention and response equipment and arrangements on site in line with applicable regulations to respond to emergency scenarios e.g. fire, explosion, floods, natural hazards etc.	Emergency response arrangements and equipment in place. Emergency contacts available. Training performed and recorded	Contractor	Regular site inspection by the Contractor and verification by the IC. Review of emergency equipment, arrangements and training records.
	Maintain a high standard of good housekeeping on site. Construction materials and light equipment should be stored properly and access routes, emergency exits and work areas kept clear of unnecessary obstructions.	Visual verification of good house-keeping on-site	Contractor	Random site inspection by the IC
21. First-aid	Ensure adequate first-aid provisions are available at all times on site, including suitably stocked first-aid kits and an adequate number of trained first-aiders. Ensure that all workers are informed of the first-aid arrangements.	Suitable first aid kits on site Trained first-aiders available during all working shifts. Valid first-aid training/certification	Contractor	Regular monitoring of first aid kits Verification by the IC of the availability of trained first-aiders and first-aid arrangements, taking into account applicable legal and contractual requirements.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
		records, as applicable.		
22. Access to health care and training	Ensure the workforce has access to appropriate medical care when required and that arrangements are in place for referral and transport to an appropriate healthcare facility in case of illness or injury.	Healthcare facilities identified; emergency contact and referral/transport arrangements available on site.	Contractor	Verification by the IC prior to commencement of works and periodically during site supervision.
	Identify an appropriate hospital, medical clinic or health center accessible from the site and establish arrangements for emergency referral and transport.	Medical centers in the proximity of the site identified and emergency contact details available.	Contractor	Medical centers in the proximity of the site identified once prior to the commencement of works. Verification by the IC

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
23. Hygiene, accommodation and food	Ensure provision of appropriate welfare, hygiene and sanitary facilities at the site, including shaded rest areas, toilets, washing/changing facilities, as appropriate and potable water. Ensure toilets and changing rooms are separated for male and female workers, as applicable.	Appropriate welfare and sanitary facilities provided at site	Contractor/ MEHE	Inspection prior to commencement of works and regular verification by the IC during site supervision. Review of grievance records
	Ensure the provision of adequate space, supply of water, adequate sewage and garbage disposal system, appropriate protection against heat, cold, damp, fire and disease-carrying animals, adequate sanitary and washing facilities, adequate lighting, and basic medical services, in accordance with all applicable health and safety regulations and norms where worker accommodation is provided.	Appropriate conditions for workers in accommodation facilities, where applicable.	Contractor/ MEHE	Inspection prior to occupation of worker accommodation and regular inspection thereafter by the Contractor, with verification by the IC Review of grievance records.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Provide workers with appropriate awareness raising on communicable disease prevention and promote appropriate hygiene and preventive measures. Any communicable disease-related information shall be handled confidentially and in accordance with applicable requirements.	Awareness/training records; relevant prevention measures in place.	Contractor	Review of awareness/training records and verification of preventive measures by the IC.
B-3 Local labor and relations with local communities				
24. Labor conditions	Ensure compliance with applicable national labor legislation, relevant ILO standards and Project labor requirements, including the minimum age of 18 years, prohibition of forced labor, non-discrimination and equal opportunity, prevention of sexual harassment and other prohibited conduct, working hours, wages and other conditions of employment.	Employment records and contracts; age verification records; payroll/time records, as applicable; Grievance Mechanism Records, Training performed and recorded	Contractor	Review of Inspection re-ports (also from labor authorities), Employment and age-verification records, as applicable. Review of grievance records Review of training records by the IC
	Ensure that all direct and indirect workers of the worker grievance mechanism, through which	Workers Grievance Mechanism in place	Contractor	Review of grievance register and grievance-handling records, while

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	they can raise workplace-related concerns or complaints confidentially and, where permitted, anonymously, without retaliation.	and grievances recorded Training /awareness raising performed and recorded		respecting confidentiality. Review of training and awareness records by the IC.
	Ensure all workers are treated fairly and without discrimination and have equal opportunity in accordance with applicable requirements.	Non-discrimination policy /applicable provisions in employment procedures Code of Conduct	Contractor	Random site inspection Review of grievance register and relevant employment records by the IC, as appropriate.
25. Local recruitment	Encourage the recruitment of qualified unskilled and skilled workers from local communities, where available and consistent with applicable recruitment procedures and labor requirements. Encourage local sourcing of goods and services where feasible and appropriate.	Local Procurement and Employment Records	Contractor	Review of procurement and employment rules and records by the IC. Review of grievance register

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
26. Transport	Organize carpools/buses for worker transportation where needed and ensure that worker transportation arrangements are safe and appropriate.	Carpools/ buses used where required; Transport arrangements in place	Contractor	Verification of worker transport arrangements by the IC, as applicable. Review of grievance register
27. Community interaction	Engage/ communicate/inform communities. Ensure consultations with the local authorities and communities regarding the construction. Obtain relevant local knowledge regarding environmental and social sensitivities, cultural heritage/chance finds, access, land use and other community concerns.	Minutes of Meetings Grievance Mechanism records	Contractor with support/coordin ation of the IC as appropriate	Review of grievance register Minutes of consultation meetings reviewed by the IC.
	Support implementation of and inform affected communities about the Project Grievance Mechanism, ensuring that potentially affected persons have accessible channels through which to raise concerns and grievances.	Grievance Mechanism in place, grievances recorded and information on grievance channels disclosed to communities.	Contractor/ IC	Review of grievance register and verification of disclosure of grievance channels.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Engage with the local community and potentially affected households to understand their needs and identify the risk of damage to their livelihood basis through the Project (e.g. restrictions on access to land or resources, lack of access to water). Any land-related impacts identified shall be assessed in accordance with the Program eligibility criteria and applicable E&S requirements. The Program will not finance land acquisition.	Minutes of Meetings Grievance Mechanism records Site screening and land ownership/use documentation, as applicable.	MEHE/IC	Review of grievance register and meeting minutes. Verification of land ownership, current land use and any potential land-related impacts during site screening.
28. Interaction between workers and students/school staff (including female students and teachers) at occupied school sites during renovation or	For renovations or extensions of schools that remain operational during construction (i.e. where works cannot be fully completed during school vacation periods), close and repeated contact between construction workers and the school community — particularly female students and female teachers — may give rise to social risks beyond those addressed by the general Project-wide provisions above, including inappropriate behaviour, sexual	Site-specific ESMP/construction schedule showing phasing relative to the school calendar Evidence of work area demarcation and access control (photos, site plans)	Contractor, with oversight by the IC and MEHE	Verification by the IC during site supervision of work area separation and access control Review of SEA/SH training records Review of grievance register for SEA/SH-related complaints, with MEHE oversight.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
extension works	harassment, exploitation or abuse. To address these risks, the Contractor shall implement the following measures, in addition to the general Code of Conduct and community interaction measures set out above: i. phase and schedule construction activities, to the extent feasible, to minimize overlap with school hours, prioritizing works in closest proximity to occupied areas for vacation periods; ii. physically separate and clearly demarcate (e.g. fencing, signage) work areas from areas accessible to students, teachers and school staff, with controlled/escorted access for workers to any areas adjacent to occupied spaces; iii. prohibit worker access to occupied school areas (e.g. classrooms, playgrounds, sanitary facilities) other than for supervised, work-related purposes;	Signed SEA/SH training records Records of coordination with school administration Grievance register		

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	iv. provide mandatory, documented SEA/SH-specific training to all workers and supervisors — covering respectful conduct towards female students and staff specifically — prior to mobilization on sites with an occupied school, in addition to general Code of Conduct training; v. require prior coordination with, and notification of, the school administration ahead of any works planned during term time, including scheduling sensitive activities away from times when female students are most present (e.g. arrival, dismissal, breaks); and vi. ensure students, teachers and parents — including a clear, confidential pathway for female students and staff to report to a female point of contact where feasible — are made aware of accessible reporting channels for any concerns or incidents, linked to the Project Grievance Mechanism			

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	and the school-level engagement described in the site-specific SEP.			
29. Damage to people and property	Ensure all contractors and subcontractors implement and enforce a Worker Code of Conduct addressing, as applicable, OHS requirements, prohibition of substance abuse at the workplace, environmental protection, non-discrimination and equal treatment, SEA/SH and sexual harassment, respectful behavior towards local communities, respect for local beliefs and customs, and appropriate community relations. Workers shall be informed of and sign the Code of Conduct prior to commencing work.	Workers Code of Conduct signed. Induction/training records. Grievance Mechanism records	Contractor	Worker interviews, Review of grievance log, Review of signed Codes of Conduct and, induction/training records by the IC.
	Ensure that site areas are provided with appropriate security, fencing, signage and lighting. Use hazard notices/signs/barriers to protect children and other vulnerable people from harm and prevent access to non-workers. Maintain secure site boundaries and control access throughout construction.	H&S planning of construction site done; items in-stalled Fencing, barriers, signage, lighting and access-control measures in place, as	Contractor	Inspection prior to the activities. Random site inspection by the IC throughout construction. Review of grievance register

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
		applicable.		
30. Land acquisition and land take	The Program will not finance land acquisition. Verify land ownership and current land use during site screening and avoid any site requiring acquisition of private land or physical or economic displacement of formal or informal landowners or land users. If such impacts are identified, the plot will not be eligible for construction. Engage with the local community, as appropriate, to verify land ownership, land use and any potential land-related impacts.	Land ownership documentation; site screening records; documentation of current land use and potential land-related impacts; consultation records, as applicable.	MEHE/IC	Once during site selection and prior to confirmation of site eligibility. Review of relevant land documentation and consultation records.
31. Traffic management	Ensure safe driving by Project personnel and Contractor/subcontractor drivers through appropriate induction/training and enforcement of site and road-safety requirements.	Driver Training Records as part of Induction training	Contractor	Review of training records and verification by the IC during site supervision.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Target signage and outreach activities to improve public awareness of traffic changes and potential hazards for high-risk sections of public roads, including near the site and laydown areas.	Warning signs Minutes of Meetings /records of community information activities, as applicable.	Contractor	Inspection of traffic routes, signage and traffic-control measures by the IC. Review of grievance register
32. Fossils/ Archaeological Chance Finds	Establish and implement a Chance Find Procedure for the protection of archaeological, historical and cultural heritage and fossils. Ensure that workers are informed of the procedure. In the event of a chance find (e.g. graves, ceramics, archaeological objects or building remains), immediately stop works in the vicinity of the find, secure and protect the area from disturbance, notify the relevant competent authority and resume works only following authorization/instructions from the competent authority.	Notification records to relevant authority, Training records, Records about chance finds and actions taken, where applicable.	Contractor	Verification by the IC that the Chance Find Procedure is in place prior to relevant excavation/earthworks. Site inspection and review of chance-find records and notifications, where applicable.

E - Generic Operation-Phase ESMP Template

This section provides a template for the site-specific Operation-Phase ESMP, covering the period after handover of a rehabilitated, extended or newly constructed school to MEHE/the school administration. It complements the Generic (Construction-Phase) ESMP Template in Section D above, which applies during construction. As with the construction-phase template, not all aspects may be relevant to every site; measures should be adapted as necessary and additional measures may be added.

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
1.Facility Operation and Maintenance	MEHE/school administration to establish and implement a routine maintenance plan for new/rehabilitated infrastructure (structural elements, electrical and sanitation systems, ventilation) to preserve the intended health, safety and environmental performance of the facility. Maintenance responsibilities and budget should be clearly assigned at school or MEHE level.	Maintenance plan/schedule in place Maintenance records	MEHE/School Administration	Periodic review of maintenance records by MEHE.
2.Health, Safety and Accessibility	Maintain functioning fire safety systems/equipment and safe electrical installations, and	Fire safety and electrical inspection records	School Administration/MEHE	Periodic safety inspections, reported to MEHE.

Environmental and Social Management Framework (ESMF)

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	Ensure playground and recreational equipment remains structurally safe. Maintain accessibility features (e.g. ramps, accessible sanitary facilities) for students and staff with disabilities. Conduct periodic safety inspections.	Accessibility inspection records		
3. Waste Management	Implement appropriate segregation, storage and disposal of solid waste generated during school operation, in line with applicable national requirements and good practice.	Waste management arrangements in place	School Administration	Periodic verification by MEHE.
4. Water and Energy Use	Promote efficient use and maintenance of water and energy systems (e.g. prompt repair of leaks, proper functioning of any energy-	O&M records for water/energy systems	School Administration	Periodic review by MEHE.

Environmental and Social Management Framework (ESMF)

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
	efficient installations provided under the Project).			
5.Community Engagement and Grievance Mechanism	Continue to make the Project/MEHE Grievance Mechanism accessible to students, teachers, parents and the surrounding community during the operational phase, for any concerns related to the facility or its use. Maintain communication channels established during construction, as relevant (e.g. for any residual concerns).	Grievance Mechanism accessible and disclosed Grievance register	MEHE	Review of grievance register during operation.
6.Grounds and Environmental Upkeep	Maintain any vegetation, drainage and erosion control measures established during construction to ensure their continued environmental function.	Site inspection records	School Administration/MEHE	Periodic site visits.

Annex 5: Stakeholder Engagement Plan(s) (SEP)²⁷

MEHE has developed a project-level Stakeholder Engagement Plan (SEP) for the Program, proportionate to the nature and scale of the Program and its potential environmental and social risks and impacts. The SEP provides the overall framework for stakeholder identification and engagement, information disclosure, consultation, inclusion of vulnerable and disadvantaged groups, grievance management, and monitoring and reporting throughout Program implementation. The SEP will be reviewed and updated, as necessary, during implementation to reflect changes in the Program, including the identification of additional sites and site-specific stakeholder engagement needs.

This annex provides supplementary guidance for the application and, where necessary, updating of the project-level SEP as Program sites and activities are further defined. Site-specific stakeholder engagement shall be proportionate to the nature and scale of the proposed activities and their potential environmental and social risks and impacts and shall be undertaken in accordance with the project-level SEP.

When applying and, where necessary, updating the project-level SEP for specific Program sites and activities, the following minimum considerations should be addressed:

Table 5 - Key considerations for site-specific stakeholder engagement plan ²⁸	
Who	✓ Which stakeholder groups and individuals need to be engaged based on the site-specific stakeholder analysis? ✓ Have vulnerable or disadvantaged groups and individuals been identified among stake-holders?
Why	✓ Why is each stakeholder group participating (e.g. how they may be affected by or have an interest in the proposed activities)?
What	✓ What is the breadth and depth of stakeholder engagement at each stage of the project cycle? ✓ What issues require information disclosure, consultation or stakeholder feedback?
How	✓ How will stakeholders be engaged (strategy and methods, including communications)? ✓ Are special measures required to ensure inclusive participation of vulnerable or disadvantaged groups?
When	✓ What is the timeline for engagement activities, and how will they be sequenced, including information disclosure?

²⁷ Based on World Bank, Environmental and Social Framework (ESF), Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure, and associated Guidance Note for Borrowers.

²⁸ Adapted from Asian Development Bank (ADB), *Strengthening Participation for Development Results: An Asian Development Bank Guide to Participation*, 2012, p. 43.

<i>Responsibilities</i>	✓ How are roles and responsibilities for stakeholder engagement allocated among MEHE, the IC and, as applicable, Contractors and other relevant parties?? ✓ What role will stakeholder representatives play? ✓ Are stakeholder engagement facilitators required?
<i>Resources</i>	✓ What resources are required for the stakeholder engagement activities and how will they be provided?

Environmental and Social Management Framework (ESMF)

1 Site-Specific Stakeholder Engagement Plan

The project-level SEP provides the overall framework for stakeholder engagement under the Program. For individual Program sites, stakeholder engagement activities should be planned and documented taking into account the specific stakeholders, activities, risks and impacts identified for the site. This will be particularly relevant for Phase 2 once the schools to be rehabilitated and/or extended and the detailed scope of works are confirmed.

The table below may be used to plan site-specific stakeholder engagement activities. It should identify the stakeholders to be engaged, their interest in or potential relationship to the proposed activities, the engagement method, timing, responsibility and estimated resources required. Site-specific engagement arrangements should be reviewed and updated as necessary during implementation.

Stakeholder Group	Interest / Reason for Engagement	Engagement Method	Timing / Frequency	Responsibility	Estimated Resources / Cost
e.g. Municipality					
School administration					
Teachers and school staff					
Students / student representatives, as appropriate					
Parents / caregivers					
Nearby residents and businesses					
Vulnerable or disadvantaged groups, as applicable					
Other relevant stakeholders identified during site screening					

2 Guidance for Site-Specific Stakeholder Engagement Plan

The following elements should be considered, as applicable, when implementing and updating the project-level SEP for specific Program sites. The scope and level of detail of site-specific stakeholder engagement should be proportionate to the nature and scale of the proposed activities and their potential environmental and social risks and impacts.

1. Introduction

- Briefly describe the proposed activities at the specific site, including the nature and scope of the works and the main potential environmental and social risks and impacts relevant to stakeholders. Where relevant, include maps of the project site and surrounding area.

2. Regulations and Requirements

- Stakeholder engagement activities shall be undertaken in accordance with the applicable national requirements, KfW requirements and other relevant environmental and social standards identified in the ESMF and the project-level SEP. Any site-specific consultation and disclosure requirements arising from the environmental and social screening and assessment process shall be identified and addressed as part of stakeholder engagement for the respective site.

3. Summary of any previous stakeholder engagement activities

- Summarize stakeholder engagement activities already undertaken in relation to the specific site and proposed activities, including information disclosure and consultation, as applicable. The summary should include:
 - Type of information disclosed, in what forms and languages (e.g., oral, brochure, reports, posters, radio, etc.), and how it was disseminated
 - Locations and dates of any meetings or other engagement activities undertaken to date
 - Individuals, groups, and/or organizations that have been consulted
 - Key issues discussed and key concerns raised
 - Responses to issues raised, including any commitments or follow-up actions
 - Process undertaken for documenting these activities and reporting back to stakeholders

4. Project Stakeholders

- Identify the key stakeholder groups relevant to the specific site and proposed activities, building on the stakeholder identification and analysis provided in the project-level SEP. who will be informed about and engaged in the project (based on stakeholder analysis). These should include as applicable persons or groups who:
 - Are directly and/or indirectly affected by the project
 - Have “interests” in the project that determine them as stakeholders
 - Have the potential to influence project outcomes or operations
 - May include, as applicable, school administrations, students, parents/caregivers, teachers and other school staff, nearby residents and businesses, municipalities and other local authorities, relevant government authorities, community organizations, NGOs and other stakeholders identified through the site-specific stakeholder analysis

- Identify vulnerable or disadvantaged individuals or groups who may be disproportionately affected or may face barriers to participating in stakeholder engagement, and identify appropriate measures to facilitate their meaningful participation

5. Stakeholder Engagement Program

- Summarize the purpose and goals of the stakeholder engagement activities for the specific site, consistent with the project-level SEP.
- Briefly describe what information will be disclosed, in what formats and languages, and the types of methods that will be used to communicate this information to each of the stakeholder groups identified in section 4 above. Information should include, as applicable, the nature and scope of the proposed works, expected schedule, potential environmental and social risks and impacts, mitigation measures, access and traffic arrangements, health and safety measures, and the Grievance Mechanism. Methods used may vary according to target audience, for example:
 - Newspapers, posters, radio, television
 - Information centers and exhibitions or other visual displays
 - Brochures, leaflets, posters, non-technical summary documents and reports
- Briefly describe the methods that will be used to engage and/or consult with each of the stakeholder groups identified in section 4. Methods used may vary according to target audience and should be appropriate to the characteristics and needs of the respective stakeholder groups.
- Describe how the views of women and other relevant groups (e.g. persons with disabilities, elderly persons, youth and other vulnerable or disadvantaged groups identified through the stakeholder analysis) will be taken into account and their participation facilitated
- Outline methods to receive feedback and to ensure ongoing communications with stakeholders (outside of a formal consultation meeting) throughout implementation.
- Describe any other engagement activities that will be undertaken, including participatory processes, joint decision-making, and/or partnerships undertaken with local communities, NGOs, or other project stakeholders. Identify, as applicable, any additional engagement activities required in response to site-specific risks, impacts or stakeholder concerns, as well as commitments or follow-up actions arising from consultations.

6. Timetable

- Provide a schedule outlining the timing/frequency and locations of site-specific stakeholder engagement activities, including consultation and information disclosure and indicate when these activities will take place in relation to the planning, pre-construction, construction and, as applicable, post-construction stages.

7. Resources and Responsibilities

- Indicate who will be responsible for carrying out the specified stakeholder engagement activities including the respective roles of MEHE, the IC and, during construction, the Contractor, as applicable.
- Specify the budget and other resources allocated toward these activities

8. Grievance Mechanism

- The Program Grievance Redress Mechanism (GRM), as established in the project-level SEP, shall apply to all Program sites and activities. Site-specific stakeholder engagement shall ensure that affected communities and other stakeholders are informed about the GRM, including the available channels for submitting grievances, the process for handling and resolving grievances, confidentiality provisions, and the manner in which responses will be communicated to complainants.
- Information on the GRM shall be disclosed in an accessible and culturally appropriate manner and through channels appropriate to the stakeholders of the respective site.

9. Monitoring and Reporting

- Describe any plans to involve project stakeholders (including target beneficiaries and project-affected groups) or third-party monitors in the monitoring of project implementation, potential impacts and management/mitigation measures
- Describe how as applicable, project stakeholders (including beneficiaries and project-affected groups) will be involved in or consulted regarding the monitoring of site-specific activities, potential environmental and social impacts, and the implementation of relevant mitigation measures.

Annex 6: Glossary of ESIA Terms²⁹

Associated Facilities means facilities or activities that are not funded as part of the project and, in the judgment of the Bank, are: (a) directly and significantly related to the project; (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist. For facilities or activities to be Associated Facilities, they must meet all three criteria.

Biodiversity is the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems.

Chance-find (procedure). A chance find is archaeological material encountered unexpectedly during project construction or operation. A chance find procedure is a project-specific procedure which will be followed if previously unknown cultural heritage is encountered during project activities. The chance finds procedure will set out how chance finds associated with the project will be managed. The procedure will include a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions consistent with the requirements of ESS8 and national law; and to train project personnel and project workers on chance find procedures.

Cultural heritage is defined as resources with which people identify as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions.

Cumulative Impact Assessment is an instrument to consider cumulative impacts of the project in combination with impacts from other relevant past, present and reasonably foreseeable developments as well as unplanned but predictable activities enabled by the project that may occur later or at a different location.

Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.

Ecosystem services are the benefits that people derive from ecosystems. Ecosystem services are organized into four types: (i) provisioning services, which are the products people obtain from ecosystems and which may include food, freshwater, timbers, fibbers, medicinal plants; (ii) regulating services, which are the benefits people obtain from the regulation of ecosystem processes and which may include surface water purification, carbon storage and sequestration, climate regulation, protection from natural hazards; (iii) cultural services, which are the nonmaterial benefits people obtain from ecosystems and which may include natural areas that are sacred sites and areas of importance for recreations and aesthetic enjoyment, and (iv) supporting services,

²⁹ Based on the World Bank Environmental and Social Framework (ESF) and its Environmental and Social Standards (ESSs).

which are the natural processes that maintain the other services and which may include soil formation, nutrient cycling and primary production.

Environmental and Social Assessment (ESA) is a generic term that describes the process of analysis and planning used by the Project Executing Agency to ensure the environmental and social impacts and risks of a project are identified, avoided, minimized, reduced or mitigated. The environmental and social assessment is a flexible process, that can use different tools and methods depending on the details of the project and the circumstances of the Project-Executing Agency.

Environmental Impact Assessment (EIA) is used under this study to describe the necessary study according to Lebanese law to assess likely environmental consequences of a proposed project, and determine necessary measures for mitigating negative environmental consequences and increasing positive impact on the environment and natural resources before approving or disapproving the project (acc. Article 2 of Decree 8633/2012).³⁰

Environmental and Social Impact Assessment (ESIA) is an instrument to identify and assess the potential environmental and social impacts of a proposed project, evaluate alternatives, and design appropriate mitigation, management, and monitoring measures.

Environmental and Social Management Framework (ESMF) is an instrument that examines the risks and impacts when a project consists of a program and/or series of subprojects, and the risks and impacts cannot be determined until the program or subproject details have been identified. The ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts. It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, including on its capacity to manage environmental and social risks and impacts. It includes adequate information on the area in which subprojects are expected to be sited, including any potential environmental and social vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used.³¹

Environmental and Social Management System (ESMS) is a dynamic and continuous process initiated and supported by management, and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.¹ Drawing on the elements of the established business management process of “plan, do, check, and act,” the ESMS entails a methodological approach to managing environmental and social risks² and impacts³ in a structured way on an ongoing basis. A good ESMS appropriate to the nature and scale of the project promotes sound and sustainable environmental and social performance, and can lead to improved financial, social, and environmental outcomes.

Environmental and Social Management Plan (ESMP) is an instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse

³⁰ Decree No. 8633/2012 on the Fundamentals of Environmental Impact Assessment, Article 2.

³¹ Based on the World Bank Environmental and Social Framework (ESF), Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts.

environmental and social impacts, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures.

Environmental, Health, and Safety Guidelines (EHSs) are technical reference documents with general and industry-specific statements of Good International Industry Practice. The EHSs contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable cost.³²

Good International Industry Practice (GIIP) is defined as the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise should be that the project employs the most appropriate technologies in the project-specific circumstances.

A Grievance is considered to be any complaint about the way a project is being implemented. It may take the form of specific complaint about impacts, damages or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments have been addressed, and concerns about Project activities during construction or operation, or perceived incidents or impacts. Positive feedback and suggestions may be filed equally via the Grievance Mechanism.

Habitat is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the non-living environment. Habitats vary in their sensitivity to impacts and in the various values society attributes to them.

Initial Environmental Examination (IEE) is used under this study to describe a preliminary study necessary according to Lebanese law to capture potential environmental impacts of a project in order to determine whether conducting an EIA study is necessary for the project (acc. Article 2 of Decree 8633/2012).³³

Involuntary resettlement. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, including those that lead to loss of income sources or other means of livelihood), or both. The term “involuntary resettlement” refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

Land acquisition refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include: (a) acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible.

“Land” includes anything growing on or permanently affixed to land, such as crops, buildings and

³² ee World Bank Group Environmental, Health, and Safety (EHS) Guidelines, including the General EHS Guidelines and applicable Industry-Sector EHS Guidelines.

³³ Decree No. 8633/2012 on the Fundamentals of Environmental Impact Assessment, Article 2.

other improvements, and appurtenant water bodies.

Livelihood refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering.

Pollution refers to both hazardous and non-hazardous chemical pollutants in the solid, liquid, or gaseous phases, and includes other components such as thermal discharge to water, emissions of short and long-lived climate pollutants, nuisance odors, noise, vibration, radiation, electromagnetic energy, and the creation of potential visual impacts including light.

Project Area: defines an area within which the ESHS aspects below and the management measures as defined in the Construction Environmental and Social Management Plan (ESMP) apply. This includes the (Construction) Site and surrounding areas that may be impacted temporary or permanently through construction activities (e.g. nearby communities, habitats, water bodies).

Project worker refers to: (a) people employed or engaged directly by the PEA (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers); (b) people employed or engaged through third parties to perform work related to core functions of the project, regardless of the location (contracted workers); (c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor (community workers) . This includes full-time, part-time, temporary, seasonal and migrant workers. Migrant workers are workers who have migrated from one country to another or from one part of the country to another for purposes of employment.

Restrictions on land use refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, restrictions on land use within utility easements or safety zones.

Site: is the places where the permanent construction works are to be executed and to which equipment and materials are to be delivered. The Site is included in the Project Area.

Social and conflict analysis is an instrument that assesses the degree to which the project may (a) exacerbate existing tensions and inequality within society (both within the communities affected by the project and between these communities and others); (b) have a negative effect on stability and human security; (c) be negatively affected by existing tensions, conflict and instability, particularly in circumstances of war, insurrection and civil unrest.