

INTERNATIONAL RESCUE COMMITTEE

Support for Social Recovery Needs of Vulnerable Groups and Additional Financing

For Negotiations

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Appraisal Version

April 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The International Rescue Committee will implement the Support for Social Recovery Needs of Vulnerable Groups Project as set out in the Grant Agreement and the Project Agreement. The World Bank, acting as the administrator of the Lebanon Financing Facility trust fund, has agreed to provide the original financing (P176622) and additional financing (P181676) for the Project, as set out in the referred agreement(s). This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
2. The International Rescue Committee shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Grant Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the International Rescue Committee shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the International Rescue Committee, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the International Rescue Committee and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the International Rescue Country Director. The International Rescue Committee shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Bi-yearly throughout the Project implementation period as part of project reporting. Reports are to be sent within 15 days after the reporting period ends.</p>	<p>IRC Environmental & Social Focal Point</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including the risks specified in the environmental and social assessment. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the World Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Promptly after taking notice of the incident or accident and within 48 hours after becoming aware of its occurrence.</p> <p>A root cause analysis would be provided within 10 days or agreed time frame, if requested.</p>	<p>IRC Environmental & Social Focal Point</p>

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE The assigned Project Lead and Project Management Team are responsible for ensuring adequate risk identification, management and reporting, in line with IRC’s well-established risk management mechanisms (as outlined under 1.2). An Environmental and Social Focal Point is the main focal point for coordination of the ESCP and its requirements and delegates specific tasks/areas as needed to the rest of the Project Team. The Project Lead and Project Management Team are supported by the IRC Lebanon’s Senior Management Team (SMT) who monitors and ensures accountability throughout the project for the implementation of the ESCP.</p>	<p>A dedicated IRC Environmental & Social Focal Point with support from the Project Management Unit for this project and IRC Lebanon Senior Management Team is in place and continue to oversee the implementation of the ESCP throughout the Project period.</p>	IRC Environmental & Social Focal Point
1.2	<p>SOCIO-ECONOMIC ASSESSMENT Update, adopt, and implement, the Socio-economic Assessment (SEA) that has been prepared for the Parent Project, in a manner acceptable to the World Bank.</p>	<p>The SEA for the Parent Project was disclosed in August 2021. The SEA will be reviewed and updated under this Additional Financing one month after project effectiveness and will be implemented throughout Project implementation.</p>	IRC Environmental & Social Focal Point

<p>1.3</p>	<p>MANAGEMENT TOOLS AND INSTRUMENTS Screen any proposed subproject in accordance with the Socio-economic Assessment as required, in a manner acceptable to the World Bank.</p> <p>The IRC will incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures into the ESHS specifications of the procurement documents and contracts with contractors, supervising firms.</p>	<p>The risk mitigation measures identified in the SEA will be in place throughout the Project implementation.</p> <p>As required throughout project implementation.</p>	<p>IRC Environmental & Social Focal Point</p>
<p>ESS2: LABOR AND WORKING CONDITIONS</p>			
<p>2.1</p>	<p>LABOR MANAGEMENT PROCEDURES Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.</p>	<p>The LMP for the Parent Project was disclosed in September 2021. The LMP will be reviewed and updated as needed throughout the Project implementation.</p> <p>It will be implemented throughout the Project implementation.</p>	<p>IRC Environmental & Social Focal Point</p>
<p>2.2</p>	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>An adequately functioning grievance mechanism is already in place for all IRC staff and partners and will continue to be in place throughout the Project implementation.</p>	<p>IRC Environmental & Social Focal Point</p>

<p>2.3</p>	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Maintain and implement occupational, health and safety (OHS) action plan that includes measures specified in the LMP in line with ESS2. The IRC will ensure that the general workplace OHS, possible outbreaks and pandemics related (Such as COVID-19, H1N1, etc.) and OHS due to waste handling and other services are properly managed.</p>	<p>An OHS action plan was prepared for the Parent Project and disclosed in March 2023. The IRC will continue to ensure that the OHS action plan is in effect and is being implemented by the NGOs receiving financing. The OHS action plan will remain in place throughout the Project implementation.</p>	<p>IRC Environmental & Social Focal Point</p>
<p>2.4</p>	<p>EMERGENCY PREPAREDNESS AND RESPONSE: As part of the OHS measures specified in 2.3, include measures on emergency preparedness and response, and ensure coordination with measures under 4.4. These measures include those outlined in IRC’s existing Contingency Plan, which is activated in times of emergencies.</p>	<p>As part of the LMP and IRC Contingency Plan and implemented throughout the Project implementation.</p>	<p>IRC Environmental & Social Focal Point</p>
<p>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p>			

<p>3.1</p>	<p>WASTE MANAGEMENT PLAN: As Part of the Medical Waste Management Plan, develop and implement measures and procedures to manage healthcare waste that is in line with ESS3, in a manner acceptable to the Bank. IRC will undertake assessments of the Mobile Medical Units (MMUs) and Primary Healthcare Centers (PHCs) to be supported under the project to document the status of implementation of medical waste management measures as per the national guidelines and requirements of the ESS3. IRC will identify and develop plans at the MMUs and PHCs level to be implemented and monitored throughout the project lifecycle.</p>	<p>The Medical Waste Management Plan for the Parent Project was disclosed in September 2021. The MWMP developed under the Parent Project will be reviewed and updated as needed throughout the Project implementation.</p> <p>The plans at the MMUs and PHCs level will be identified and developed once the MMUs and PHCs are selected. They will be implemented and monitored throughout the Project implementation.</p>	<p>IRC Environmental & Social Focal Point</p>
<p>ESS 4: COMMUNITY HEALTH AND SAFETY</p>			
<p>4.1</p>	<p>TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks.</p>	<p>The IRC implements Traffic and Road Safety Standards which will apply to this Project and maintained throughout implementation.</p>	<p>IRC Environmental & Social Focal Point</p>

<p>4.2</p>	<p>COMMUNITY HEALTH AND SAFETY: The IRC continuously monitors the risks and impacts to the community arising from the project activities, as specified in the SEA under 1.2. To manage the impacts of the possible outbreaks such as COVID or others, IRC has an existing Pandemic Management Plan In addition, IRC’s Environmental Policy outlines our commitment to the responsible and efficient use of resources and respect for the environment.</p>	<p>The IRC will apply the measures set out under 1.2.</p>	<p>IRC Environmental & Social Focal Point</p>
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4.3	<p>GBV AND SEA RISKS: The IRC applies high ethical standards to prevent and address cases of gender-based violence (GBV), sexual harassment in the workplace, and sexual exploitation and abuse (SEA) these are set out in IRC’s Code of Conduct, the Respect at the Workplace Policy, IRC Harassment-Free Workplace Policy, and IRC Guidelines for a Survivor-Centered Approach to Reporting Safeguarding Misconduct as part of IRC’s Beneficiary Safeguarding Policy.</p>	<p>The IRC’s approach to GBV and SEA risks is in place through IRC’s existing policies and will remain in place throughout the Project implementation.</p> <p>A GBV Action Plan was prepared for the Parent Project and disclosed in September 2022. The GBV Action Plan will be reviewed and updated as needed throughout the Project implementation.</p>	IRC Environmental & Social Focal Point
4.4	<p>EMERGENCY RESPONSE MEASURES: Develop and implement measures to address emergency events and ensure coordination with measures under 2.4.</p>	As part of the LMP and IRC Contingency Plan and implemented throughout the Project implementation.	IRC Environmental & Social Focal Point
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Currently not relevant to the project.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Currently not relevant to the project.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

7.1	Currently not relevant to the project.		
ESS 8: CULTURAL HERITAGE			
8.1	Currently not relevant to the project.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Currently not relevant to the project.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Update, adopt, and implement Stakeholder Engagement Plan (SEP).</p>	<p>The IRC updated and disclosed the SEP for the proposed additional financing Project. The SEP will be regularly reviewed and updated as needed throughout the Project implementation.</p>	<p>IRC Environmental & Social Focal Point</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM: Adopt, maintain and operate a grievance mechanism, as described in the SEP.</p>	<p>IRC currently has a robust grievance mechanism in place. This mechanism is active and described in the SEP and will be further adapted to the specificities of this Project in collaboration with local NGO implementing partners at the start of the Project to ensure it is fit for purpose. This will be done once local NGO/CSO partners are selected through a direct selection and competitive selection process, which will take place in the first two months of Project implementation. For partners chosen through direct selection, the grievance mechanisms are already established and implemented.</p>	<p>IRC Environmental & Social Focal Point</p>

<p>10.3</p>	<p>SEA/SH GRIEVANCE MECHANISM Implement, maintain and operate a reporting, handling and investigations mechanism for SEA/SH allegations relating to the Project. Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances related to SEA/SH risks. The existing project GM shall include referral pathways in the event of any SEA/SH-related complaint using a survivor-centered approach with focus on confidentiality and anonymity.</p>	<p>The IRC operates a comprehensive reporting, handling, and investigations mechanism to ensure a survivor-centered approach to safeguarding misconduct, including SEA and SH. This is reflected in the LMP for this Project, and it is detailed in IRC Guidelines for a Survivor-Centered Approach to Reporting Safeguarding Misconduct, which is part IRC’s Beneficiary Safeguarding Policy. The process is overseen by IRC’s Ethics and Compliance Unit (ECU), which counts with one of the largest teams of investigators in the NGO sector. The process will remain in place and be implemented throughout the Project implementation.</p>	<p>IRC Environmental & Social Focal Point</p>
<p>CAPACITY SUPPORT (TRAINING)</p>			
<p>CS1</p>	<p>In working with local NGOs as implementing partners, the IRC will conduct an assessment of capacities and facilitate training and support as required, depending on capacity gaps. This may include:</p> <ul style="list-style-type: none"> • Administrative and financial management • Procurement • Environmental and Social Framework • SEA/SH prevention and control • Grievance Mechanism and SEA/SH referral pathways • Medical Waste Management • Occupational health and safety 	<p>After the selection of implementing partners (following project effectiveness), an assessment of capacity needs will be conducted, and support provided as required.</p>	<p>IRC Environmental & Social Focal Point</p>

	<ul style="list-style-type: none">• Monitoring Evaluation Accountability and Learning• Technical Quality		
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