

**REPUBLIC OF LEBANON**  
**Ministry of Economy and Trade**

**Lebanon Wheat Emergency Response  
Project  
(P178866)**

**ENVIRONMENTAL and SOCIAL  
MANAGEMENT PLAN  
(ESMP)  
Including Labor Management Procedures  
(LMP)**

**Beirut  
August 2022**

## Abbreviations and Acronyms

<b>AQMN</b>	Air Quality Monitoring Network ,
<b>CAS</b>	Central Administration of Statistics
<b>CCIA</b>	Chambers of Commerce Industry and Agriculture
<b>CERC</b>	Contingency Emergency Response Component
<b>CNRS</b>	Centre National de Recherche Scientifique (National Council for Scientific Research)
<b>C-OHSP</b>	Contractor Occupational Health and Safety Plan
<b>COVID-19</b>	Corona Virus Disease
<b>EHS</b>	Environmental Health and Safety Guidelines
<b>EIA</b>	Environmental Impact Assessment
<b>EPA</b>	Environmental Protection Agency
<b>ESCP</b>	Environmental and Social Commitment Plan
<b>ESF</b>	Environmental and Social Framework
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESR</b>	Environmental and Social review
<b>ESS</b>	Environmental and Social Standard
<b>ESSN</b>	Emergency Social Safety Net Project
<b>FAO</b>	Food and agriculture organization
<b>GASC</b>	General Authority For Supply Commodities in Egypt
<b>GBV</b>	Gender Based Violence
<b>GDCS</b>	General Directorate of Cereals and Sugar beet
<b>GHG</b>	Greenhouse Gas
<b>GM</b>	Grievance Mechanism
<b>GOL</b>	Government of Lebanon
<b>GPN</b>	Good Practice Note
<b>IEE</b>	Initial Environmental Examination
<b>IFRC</b>	International Federation of Red Cross and Red Crescent Societies
<b>ILO</b>	International Labor Organization
<b>IPF</b>	Investment Project Financing:
<b>IPM</b>	Integrated Pest Management
<b>IRI</b>	Industrial Research Institute
<b>LARI</b>	Lebanese Agricultural Research Institute's
<b>LCIA</b>	Lebanese Central Inspection Agency
<b>LHDF</b>	Lebanon Humanitarian & Development NGOs Forum
<b>LRC</b>	Lebanese Red Cross
<b>LMP</b>	Labour Management Procedures
<b>MOA</b>	Ministry of Agriculture
<b>MOE</b>	Ministry of Environment
<b>MOET</b>	Ministry of Economy and Trade

<b>MOF</b>	The Ministry of Finance
<b>MOI</b>	Ministry of Industry
<b>MOIM</b>	Ministry of Interior and Municipalities
<b>MOL</b>	Ministry of Labor
<b>MOPH</b>	Ministry of Public Health
<b>MOPWT</b>	Ministry of Public Works and Transport
<b>MPI</b>	Multidimensional Poverty Index
<b>NGO</b>	Non-Governmental Organization
<b>NPTP</b>	Emergency National Poverty Targeting Program Project
<b>OECD</b>	Organization for Economic Co-operation and Development
<b>PAP</b>	Project's Affected Populations
<b>PDO</b>	Project Development Objective
<b>PPE</b>	Personal Protective Equipment
<b>PM</b>	Particulate Matters
<b>PoB</b>	Port of Beirut
<b>POPs</b>	Persistent Organic Pollutants
<b>PoT</b>	Port of Tripoli
<b>SEA/SH</b>	Sexual Exploitation and Abuse/Sexual Harassment
<b>SEP</b>	Stakeholders Engagement Plan
<b>SMEB</b>	Survival and Minimum Expenditure Basket
<b>SSNP</b>	Social Safety Net Project
<b>TPMA</b>	Third-Party Monitoring Agency
<b>TSEZ</b>	Tripoli Special Economic Zone:
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change
<b>UNHCR</b>	United Nations High Commissioner for Refugees
<b>US</b>	United States
<b>VOC</b>	Volatile Organic Compound
<b>WB</b>	World Bank
<b>WBG</b>	World Bank Group
<b>WFP</b>	World Food Program
<b>WHO</b>	World Health Organization
<b>WISC</b>	Wheat Import Supply Chain

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## ملخص تنفيذي

تم إعداد خطة الإدارة البيئية والاجتماعية (ESMP) لمشروع الاستجابة الطارئة للقمح في لبنان (P178866).

تتضمن الخطة (1) وصفاً للمشروع ، (2) الإطار المؤسسي والقانوني ، (3) خط الأساس البيئي والاجتماعي ، (4) تقييم المخاطر والآثار البيئية والاجتماعية وتدابير التخفيف، (5) خطة المراقبة و (6) المشاورات والإفصاح عن المعلومات و (7) آلية التظلم (GM) ويشمل أيضًا إجراءات إدارة العمل (LMP) للمشروع. يعتبر التصنيف الشامل للمخاطر البيئية والاجتماعية للمشروع جوهريًا. تعتبر المخاطر البيئية معتدلة وتعتبر المخاطر الاجتماعية كبيرة. تم إعداد خطة الإدارة البيئية والاجتماعية (ESMP) وفقًا للإطار البيئي والاجتماعي للبنك الدولي (ESF) وتنفيذها وزارة الاقتصاد والتجارة (MOET). توجد خطة مستقلة لإشراك أصحاب المصلحة (SEP) تم إعدادها والإفصاح عنها للجمهور. كما تم إعداد خطة الالتزام البيئي والاجتماعي (ESCP) للمشروع والإفصاح عنها علنًا، مع التزام من الحكومة لتخفيف / إدارة المخاطر والآثار البيئية والاجتماعية السلبية للمشروع. مدة المشروع سنة واحدة، تؤمن إمدادات القمح حوالي 4-5 أشهر.

## مكونات المشروع هي:

(أ) المكون 1: تمويل احتياجات استيراد القمح الفورية والحفاظ على وصول الخبز للفئات السكانية الفقيرة والضعيفة (147.5 مليون دولار أمريكي): من المتوقع أن يتمكن المشروع من المساعدة في شراء ما يقدر بـ 250 ألف طن متري من القمح. سيسمح ذلك بالحفاظ على الأمن الغذائي لنحو 6.8 مليون لبناني بما في ذلك ما يقرب من 1.5 مليون لاجئ وطالب لجوء على مدى فترة تتراوح من 3 إلى 5 أشهر. سيتم شراء القمح من خلال مستوردي القطاع الخاص وفقًا للممارسات التجارية. ستوقع وزارة الاقتصاد والتجارة (MOET) ، وهي الوكالة المنفذة، اتفاقيات إطارية مع مستوردي القمح المختارين الذين يمثلون لمتطلبات الأهلية للبنك الدولي ويستوفون معايير التأهيل المحددة مسبقًا، للعمل كوسطاء في إطار هذا المشروع.

(ب) المكون 2: إدارة المشروع وبناء القدرات (2.5 مليون دولار أمريكي): سيمول هذا المكون جميع جوانب إدارة المشروع، بما في ذلك المعدات والمواد، والامتثال للمتطلبات الائتمانية والمشتريات والصندوق البيئي والاجتماعي (ESF) ، والرصد والتقييم، وتقييم الأثر. وإدارة المعرفة والاتصال.

## الإطار السياسي والقانوني والمؤسسي

تتعلق القوانين واللوائح الرئيسية ذات الصلة بالمشروع بما يلي: (1) البيئة مثل القانون اللبناني 2002/444 أو قانون البيئة والمرسوم اللبناني 2012/8633 أو مرسوم EIA ، (2) النفايات الصلبة والخطرة مثل القانون 80 بتاريخ 2018 بشأن الإدارة المتكاملة للنفايات الصلبة (3) القرار 1/6 - 2022 بشأن المعايير الوطنية لجودة البيئة، (4) العمل والصحة والسلامة المهنية (OHS) مثل قانون العمل بتاريخ 1946 وتعديلاته، القانون 335 بتاريخ 2001، القانون 400 بتاريخ 2002، المرسوم 8987 بتاريخ 2012، المرسوم 11802 بتاريخ 2004، المرسوم 9129 بتاريخ 2022 و (v) الأنظمة الاجتماعية بما في ذلك المرسوم الجنائي رقم 340 لسنة 1943، القانون 205 لسنة 2020، القانون 28 لسنة 2007 والمرسوم 6940 لسنة 2020.

لبنان من الدول الموقعة على العديد من الاتفاقيات الدولية مثل اتفاقية بازل (المصدق عليها بالقانون 1994/387، 2015/29)، وبروتوكول كيوتو لاتفاقية الأمم المتحدة الإطارية بشأن تغير المناخ (تم التصديق عليه بموجب القانون رقم 2006/738) ، واتفاقية ستوكهولم (المصدق عليها بالقانون 2002/432)، وتوقيع اتفاقية برشلونة (تم التصديق عليها بالمرسوم بقانون رقم 126) 1977/6/30 تعديلات قانون الالتصاق رقم 34 2008/10/16).

ينطبق الإطار البيئي والاجتماعي للبنك الدولي على المشروع. ستة من أصل عشرة معايير بيئية واجتماعية (ESSs) للإطار البيئي والاجتماعي (ESF) ، ذات صلة بالمشروع وتطبق متطلباتها. المعيار البيئي والاجتماعي 1 (ESS1): تقييم وإدارة المخاطر والآثار البيئية والاجتماعية، المعيار البيئي والاجتماعي 2 (ESS2): ظروف العمل، المعيار البيئي والاجتماعي 3 (ESS3): كفاءة الموارد ومنع التلوث وإدارته، المعيار البيئي والاجتماعي 4 (ESS4): صحة وسلامة المجتمع، المعيار البيئي والاجتماعي 6 (ESS6): حفظ التنوع البيولوجي والإدارة المستدامة للحياة الطبيعية. الموارد



والمعيار البيئي والاجتماعي 10: (ESS10) إشراك أصحاب المصلحة والكشف عن المعلومات.

ستشارك عدة مؤسسات في تنفيذ مشروع الاستجابة الطارئة للقمح في لبنان. وهي تشمل وزارة المالية وغيرها من المؤسسات والوزارات العامة، ووكالات الأمم المتحدة، والصليب الأحمر اللبناني (LRC)، والاتحاد الدولي لجمعيات الصليب الأحمر والهلال الأحمر (IFRC)، تجمع المطاحن، ونقابات المخازن والأفران، وغرفة التجارة والصناعة. والزراعة والوكالات الملاحية اللبنانية.

### الأسس البيئية والاجتماعية

تم تعريف هذا المشروع على مستوى البلاد لشراء القمح للسكان في جميع أنحاء لبنان. ومع ذلك، فإن حدود المشروع تقتصر على مباني مرفأ بيروت (PoB) ومرفأ طرابلس (PoT)، وبالتالي، سيكون الطحن والتوزيع خارج حدود المشروع. يقع PoB في الجزء الشمالي من مدينة بيروت على ساحل البحر الأبيض المتوسط. تنحصر المساحة البحرية للميناء بحاسرين رئيسيين يحدان من نشاط الأمواج داخل أحواض الميناء، وبالتالي يحدان من الحركة بين الأحواض والبحر المفتوح. تأثرت البنية التحتية في PoB بشدة بالانفجار الذي حدث في أغسطس 2020، بما في ذلك البنية التحتية لتفريغ الحبوب. تم تدمير الأهرات التي تبلغ سعتها التخزينية 120 ألف طن قمح بشكل كامل إلى جانب آلات النقل التي استخدمت لتفريغ الشحنات مباشرة من السفن الموجودة على الرصيف إلى الأهرات. يتم تفريغ القمح حاليًا باستخدام الرافعات المتحركة، وعادة ما يتم تحميل الشاحنات مباشرة لنقل القمح إلى المطاحن. منطقة PoB، والمناطق المحيطة بها، هي منطقة حضرية للغاية. يعتبر استخدام الأرض في المناطق المحيطة بالميناء لـ PoB صناعيًا بشكل أساسي مع وجود بعض المناطق السكنية على بعد بضعة مئات من الأمتار من سياج الميناء. يقع PoT في الجزء الشمالي من مدينة طرابلس، ثاني أكبر مدينة في لبنان. يوجد في PoB ميناء صيد على حدوده الغربية، واستخدام الأراضي المحيطة المباشر هو صناعي بشكل أساسي مع وجود منطقة سكنية قريبة بجوار حدودها الشرقية. يقع مكب طرابلس ومحطة معالجة مياه الصرف الصحي في طرابلس - اللذان لا يعملان بشكل كامل في الوقت الحالي - بالقرب من الحدود الغربية للميناء.

من حيث جودة الهواء في لبنان، تتجاوز مستويات الملوثات الغازية والجسيمات ومحتوياتها الكيميائية والمركبات العضوية المتطايرة الحدود التي أوصت بها منظمة الصحة العالمية للمتوسطات السنوية كما ورد في تقرير حالة البيئة في لبنان. (SOER-2020 البيئة البيولوجية في PoB ملوثة نتيجة للأنشطة التي تحدث، والقرب من مصبات مياه الصرف الصحي غير المعالجة والمخلفات الصلبة في موقع التفريغ العشوائي. كما أثر الانفجار على الظروف البيئية في الميناء حيث أفرجت بعض المستودعات عن المواد المخزنة، وغرقت بعض السفن وتسبب في إطلاق بعض الملوثات على البيئة البحرية. نظرًا لكميات النفايات الصلبة الملقاة في المكب ومياه الصرف الصحي التي يتم تصريفها في البحر دون معالجة، فإن PoT هي أيضًا منطقة شديدة التلوث. لمكافحة الحرائق، يعتمد كلا الميناءين على فرق الإطفاء التي تقع على بعد مئات الأمتار من الميناء.

قبل انفجار PoB في آب (أغسطس) 2020، كان حوالي 85% من الحبوب التي تصل لبنان تمر عبر أهراءات ميناء بيروت. أما الـ 15% الباقية فتستلمها الشركات الخاصة مباشرة. بعد الانفجار الهائل في PoB، كان على الأطراف المختلفة المشاركة في سلسلة توريد القمح الارتجال للحفاظ على عملها. فيما يلي الخطوات والعمليات الرئيسية المتبعة حاليًا في تفريغ أوعية القمح.

• تعقيم الشاحنات: الشركة المتخصصة Yellow tech هي المسؤولة عن تعقيم الشاحنات المستخدمة في نقل الحبوب من PoB. ومع ذلك، يمكن أن تستفيد عملية التعقيم من الكثير من التحسينات.

• تفريغ القمح: يتم تفريغ القمح من السفينة باستخدام متعهد النقل. ثم ينتقل متعهد النقل من السفينة إلى قمع حيث يتم تفريغ القمح في شاحنات معقمة. خلال هذه العملية، هناك تولد هائل للغبار والكثير من هدر الحبوب. لا تقوم أي من المؤسسات العامة بمراقبة عملية التفريغ بشكل مستمر. بالإضافة إلى ذلك، فإن معظم الآلات المستخدمة أثناء التفريغ صديئة وفي حالة سيئة وقد تحدث انسكابات زيتية وتكاد تكون تدايير الصحة والسلامة المهنية (OHS) غير موجودة للعمال.

• نقل القمح إلى المطاحن: يتم تغطية جميع الشاحنات قبل مغادرة الميناء.

يتسم الملف الديموغرافي والبيئة الاجتماعية والاقتصادية في لبنان باستضافة أعلى نسبة من اللاجئين في العالم من حيث نصيب الفرد، على الرغم من كونها دولة صغيرة يبلغ عدد سكانها 6 ملايين نسمة. تُظهر أحدث التقديرات الصادرة عن الحكومة اللبنانية أن البلاد تستضيف 1.5 مليون نازح سوري، إلى جانب 31502 لاجئًا فلسطينيًا من سوريا، ويبلغ عدد السكان الموجودين مسبقًا أكثر من 277985 لاجئًا فلسطينيًا. تشير التقديرات إلى أن 34 في المائة من اللبنانيين و50 في المائة من اللاجئين عانوا من انعدام الأمن الغذائي في عام 2021. الخبز هو العنصر الوحيد الأكبر في سلة الإنفاق والحد الأدنى للبقاء (SMEB) في لبنان، حسب حساب برنامج الغذاء العالمي في 2020. يقع حوالي 88 بالمائة من أسر اللاجئين السوريين تحت الشركات الصغيرة والمتوسطة. الأسر الفقيرة والضعيفة واللاجئون هم الأكثر تضررًا من أي اضطراب في سلسلة قيمة القمح. بسبب تدهور الوضع الاقتصادي والمالي، ستواجه الفئات الضعيفة اجتماعيًا واقتصاديًا المزيد والمزيد من الصعوبات في تلبية احتياجاتهم الأساسية، بما في ذلك الغذاء. تم تطوير مؤشر الفقر متعدد الأبعاد في لبنان (MPI) من قبل الإدارة المركزية للإحصاء (CAS) والبنك الدولي ونشر في عام 2022. ويستند إلى فكرة أن الفقر لا يتعلق فقط بشخص أو أسرة ذات دخل منخفض، ولكنه يشمل نطاق أوسع. مجموعة من العوامل مثل نقص المياه النظيفة أو الكهرباء، وسوء نوعية العمل أو التعليم المدرسي المحدود. يكشف مؤشر MPI لعام 2019 في لبنان أن 53.1٪ من سكان لبنان كانوا فقراء متعددي الأبعاد. يبلغ عدد الفقراء المدقعين 16.2 في المائة من السكان

يقدر إجمالي مساحة الأراضي الزراعية في لبنان بنحو 332 ألف هكتار، منها 231 ألف هكتار مزروعة (نصف المساحة تقريبًا مروية)، بمتوسط مساحة للأراضي البعلية 1.36 هكتار ومساحة مروية 1.23 هكتار. تغطي المحاصيل الدائمة 54٪ من إجمالي الأراضي المزروعة، تليها المحاصيل المؤقتة بنسبة 44٪، والزراعة المحمية (البيوت البلاستيكية) التي تمثل 2٪ من إجمالي الأراضي المزروعة في لبنان. يزرع القمح في شهري نوفمبر وديسمبر ويحصد في يونيو. تبلغ المساحة الإجمالية المزروعة بالقمح حوالي 40 ألف هكتار. 85 في المائة من إنتاج الحبوب في لبنان في محافظات البقاع وبعلمك الهرمل وعكار. متوسط الإنتاج 3 أطنان للهكتار الواحد.

بعد الأزمات المتعددة التي واجهها لبنان خلال السنوات القليلة الماضية، ازداد حجم العنف ضد الأطفال والنساء بشكل كبير. مع تزايد الاحتياجات الاجتماعية والاقتصادية ومواطن الضعف بالإضافة إلى الأعراف الاجتماعية الموجودة مسبقًا والاختلافات المنسوبة إلى الذكور والإناث، أصبحت النساء أكثر عرضة للعنف المنزلي والتحرش الجنسي والاستغلال الجنسي والاعتداء الجنسي مع زيادة الحواجز التي تحول دون الوصول إلى الخدمات والفرص. خلال COVID 19، يمكن أن يؤدي الإجهاد وتعطل الشبكات الاجتماعية والحماية وفقدان الدخل وانخفاض الوصول إلى الخدمات إلى تفاقم خطر العنف ضد المرأة. في الربع الأول من عام 2020، أشار لبنان إلى زيادة بنسبة 4٪ في العنف الشريك الحميم مقارنة بالفترة نفسها من عام 2019. بالإضافة إلى ذلك، نتيجة لانفجار PoB، تأثرت بعض مراكز الرعاية الصحية وبالتالي تأثر تقديم الخدمات للنساء بشكل خاص.

### المخاطر البيئية والاجتماعية المحتملة وتدابير التخفيف

المخاطر والآثار البيئية السلبية المحتملة المرتبطة بالمشروع هي:

أولاً. انبعاثات الغبار وعمليات التبخير: أثناء التفريغ، أثناء نقل القمح، قد يتولد غبار عضوي ويمكن أن يضر بالعمال وبدرجة أقل جودة الهواء.

ثانياً. إدارة سلامة الأغذية والتخزين: هناك بعض المخاطر المتعلقة بسلامة الغذاء في حالة احتواء القمح المستورد على بعض الفطريات أو السموم ذات الصلة، أو بعض المخلفات من أنشطة التبخير أثناء التحميل عند المنبع وفي العبور. هناك عوامل بيولوجية مسؤولة عن خسائر التخزين مثل محتوى الرطوبة والحشرات، والآفات، والكائنات الدقيقة والقوارض. قبل تخزين حبوب القمح، يجب تجفيفها إلى مستوى مناسب من محتوى الرطوبة؛ وإلا فقد تحدث العديد من المشكلات مثل الإنبات وفقدان جودة الأكل. إذا تم تذكر القمح المتساقط على الأرض أثناء أنشطة التفريغ واستخدامه للاستهلاك البشري، فقد يشكل تهديدًا لسلامة الغذاء

ثالثاً. حالات الطوارئ والحريق: شاحنة التعقيم تحمل خزان ديزل. لذلك، هناك خطر نشوب حريق قد يعرض حياة العمال للخطر، خاصة إذا لم تكن الشاحنة مجهزة جيدًا بمعدات مكافحة الحرائق وإذا لم يتم اتخاذ تدابير الوقاية المناسبة من الحرائق.

رابعاً. مخاطر الصحة والسلامة المهنية: (OHS) سوف يرتبط تفرغ القمح من السفن بمخاطر الصحة والسلامة المهنية المحدودة لعمال الميناء بسبب الأجسام المتحركة ومخاطر بخار الماء الذي يتسبب في حروق أو إصابات للعمال.

خامساً. حوادث محتملة أثناء النقل: هناك بعض المخاطر المتعلقة بسلامة الطرق المتعلقة بنقل القمح من الموانئ إلى المطاحن. يلعب الاستخدام غير الملائم لإجراءات السلامة من قبل مستخدمي الطريق دوراً حيوياً في زيادة معدلات الإصابة بالأمراض والوفيات الناجمة عن إصابات الطرق. علاوة على ذلك، غالباً ما تعمل السلوكيات المشتتة للانتباه كمحفز يزيد من خطر التورط في حوادث الطرق. يمكن أن تكون حوادث الطرق أيضاً بسبب نقص صيانة المركبات.

### المخاطر والآثار الاجتماعية السلبية المحتملة المرتبطة بالمشروع هي:

أولاً مخاطر العمل: نظراً لطبيعة تدخل المشروع، فإن مخاطر العمل الرئيسية التي قد تكون مرتبطة بالمشروع محدودة وتشمل مخاطر على عمال المشروع تتعلق بظروف العمل التي لا تتوافق مع قانون العمل اللبناني أو المعيار البيئي والاجتماعي 2. (ESS2)

ثانياً. عمالة الأطفال المحتملة والسخرة التي يشترك فيها الموردون الرئيسيون وهم شركات تجارية،

ثالثاً. عدم إمكانية الوصول إلى بعض الفئات الضعيفة: قد يفتقر المشروع إلى الاعتبارات الخاصة بالمعاملة المتميزة للفئات الضعيفة مثل كبار السن والأشخاص الذين يعانون من ظروف موجودة مسبقاً والشباب والأشخاص ذوي الإعاقة الذين قد لا يتمكنون من الحصول على الخبز. قد يكون هذا جزئياً بسبب تهريب القمح المدعوم الذي قد يعيق وصول السكان الأكثر ضعفاً إلى الخبز الميسور التكلفة.

رابعاً. المخاطر المرتبطة بالانتقال من نظام دعم القمح الحالي إلى نظام أكثر توجهاً نحو السوق: ترتبط المخاطر الاجتماعية الإضافية بالخدمات الاستشارية والمساعدة الفنية في إطار المكون 2 التي ستساعد في الانتقال المخطط لوزارة الاقتصاد والتجارة من نظام دعم القمح الحالي إلى سوق أكثر نظاماً موجه.

خامساً. العنف القائم على النوع الاجتماعي (GBV) والتحرش والاستغلال والاعتداء الجنسيين (SEA): يمكن أن تلعب المعايير وعدم المساواة بين الجنسين دوراً رئيسياً في الحصول على الخبز. علاوة على ذلك، يمكن أن يؤدي جائحة COVID-19 الحالي والوضع الاقتصادي المتدهور إلى خلق أو تفاقم الظروف التي تعرض النساء والفتيات بشكل خاص لخطر أكبر من SEA / H. على سبيل المثال، قد تُجبر النساء والفتيات على تبادل الخدمات الجنسية للحصول على الطعام أو حتى الخبز.

تشمل تدابير التخفيف (1) استخدام معدات الحماية الشخصية المناسبة (PPE)، (2) ضمان الإجراءات المناسبة لإدارة الآفات ومتطلبات الإدارة المتكاملة للآفات (IPM)، (3) تنفيذ إرشادات الصحة والسلامة المهنية، (4) ضمان تلبية القمح لمعايير سلامة الأغذية، (5) ضمان التخزين المناسب واعتماد تدابير الوقاية من الحرائق اللازمة (6) ضمان إعداد خطة التأهب للطوارئ والاستجابة لها بما في ذلك خطة إدارة طوارئ الحرائق (7) احترام قواعد المرور، (8) اطلب من مستوردي القمح التوقيع على شهادة حيث يؤكدون ذلك (9) تصميم وتنفيذ وصيانة آلية عامة فعالة للتعامل مع الشكاوى والمخاوف لجميع العاملين في المشروع بما في ذلك مسارات الإحالة إلى SEA / SH والمجتمعات (x) المتابعة عن كثب حول فئات الأشخاص الذين يتلقون الخبز، و (11) الانخراط في مشاورات شاملة مع جميع أصحاب المصلحة المحددين بما في ذلك الفئات الضعيفة مثل اللاجئين.

### المراقبة

للتأكد من أن تدابير التخفيف في سياقها وتنفيذها بشكل صحيح، ستراقب وزارة الاقتصاد والتجارة أنشطة المشروع. يجب أن تحافظ وزارة الاقتصاد والتجارة على ضابط الاتصال البيئي والاجتماعي (E&S) الذي سيدعم إدارة المخاطر البيئية والاجتماعية والصحية والسلامة (ESH) للمشروع. وبناءً على ذلك، يجب توفير نقطة الاتصال البيئية والاجتماعية المعينة من قبل وزارة الاقتصاد والتجارة من خلال التدريب الكافي على: (1) الإطار البيئي والاجتماعي

(ESF) والتشغيل الفعال لآلية التظلم بما في ذلك مسارات الإحالة للتقييم البيئي الاستراتيجي / الصحة العقلية والمجتمعات، (2) تحديد أصحاب المصلحة وإشراكهم و (3) التأهب لحالات الطوارئ والاستجابة. أثناء التنفيذ، ستضمن نقطة الاتصال البيئية والاجتماعية المعينة من قبل وزارة الاقتصاد والتجارة تنفيذ متطلبات البيئة والصحة والسلامة المحددة في خطة الالتزام البيئي والاجتماعي (ESCP) و (SEP) و (ESMP). يجب أن تقوم بزيارات ميدانية منتظمة لمراقبة الأنشطة البيئية والاجتماعية التي ينفذها المقاولون والتأكد من دمج متطلبات البيئة والصحة والسلامة في العقود مع الموردين والمستندات. يجب على مسؤول الاتصال البيئي والاجتماعي المعين من قبل وزارة الاقتصاد والتجارة إعداد تقارير مراقبة منتظمة للبنك الدولي حول الأداء البيئي والاجتماعي والصحي والسلامة (ESHS) للمشروع، بما في ذلك على سبيل المثال لا الحصر تنفيذ خطة الالتزام البيئي والاجتماعي (ESCP) وأنشطة مشاركة أصحاب المصلحة، وأداء الآلية العامة (المدراء العامين)، بما في ذلك على سبيل المثال لا الحصر سجلات المظالم، ويجب على وزارة الاقتصاد والتجارة إخطار البنك الدولي على الفور بأي حادث أو حادث متعلق بالمشروع وفقاً لخطة الالتزام البيئي والاجتماعي (ESCP) المفصّل عنها والمفصّل عنها.

### الاستشارات والإفصاح عن المعلومات

وفقاً لمتطلبات المعيار البيئي والاجتماعي 10 (ESS10)، وعلى النحو المبين في خطة التقييم الاستراتيجي، ستجري وزارة الاقتصاد والتجارة مشاورات عامة واسعة ومفتوحة مع أصحاب المصلحة في المشروع الذين يتأثرون أو يحتمل أن يتأثروا بشكل مباشر، أو غير مباشر، أو إيجابياً أو عكسياً بالمشروع والتي قد يكون لها أثر مباشر أو غير مباشر. مصلحة في المشروع.

تمت المشاورات قبل وأثناء إعداد خطة الإدارة البيئية والاجتماعية وفقاً للخطوات التالية.

تم إجراء التحديد المبدئي لأصحاب المصلحة والتشاور معهم خلال مرحلة الإعداد في مارس 2022، نلتها مشاورات مع مالكي المطاحن في وزارة الطاقة والبيئة في 17 مارس 2022. وكان من بين الأطراف التي كانت حاضرة وزارة الصناعة، و3 مصانع، والبنك الدولي. النتائج الرئيسية للاستشارة هي (1) اختيار المطاحن البائعين من خلال الوسطاء. يقوم الوسطاء بالتسويق بناءً على المتطلبات المحددة من قبل المطاحن، (2) إجمالي سعة التخزين الحالية للبلد هو 125000 طن (صوامع ومستودعات) والتي تساوي شهرين من الاستهلاك (4) الواردات في حدود 50-60.000 طن شهرياً، (5) منذ الحرب الروسية الأوكرانية، ارتفعت أسعار القمح وتقلبت بين 460-520 دولاراً أمريكياً للطن و (6) يشير المستوردون / المطاحن إلى أنهم قادرون على تأمين الشحنات إلى لبنان، ولكن بسبب ضخامة التأخير من البنك المركزي، قد لا تكون قادرة على شراء القمح.

عُقدت مشاورات أخرى في 9 يونيو 2022 كجزء من خطة الإدارة البيئية والاجتماعية. تم إرسال الدعوات للتشاور مع أصحاب المصلحة يوم الخميس 2 يونيو 2022 عبر البريد الإلكتروني مع إرفاق مسودة العرض التقديمي (راجع الملحق ب). مددت الوزارة الدعوة إلى خمسين من أصحاب المصلحة المحددين. تم إجراء المشاورة بما يتماشى مع الموارد المتاحة لتنفيذ مشاركة أصحاب المصلحة في سياق COVID-19 و "مذكرة فنية للبنك الدولي: المشاورات العامة ومشاركة أصحاب المصلحة في العمليات التي يدعمها البنك الدولي عندما تكون هناك قيود على عقد اجتماعات عامة" بتاريخ 20 مارس، 2020. تم شرح مكونات المشروع المرتبطة بالمخاطر البيئية والاجتماعية، والآثار وتدابير التخفيف في عرض تقديمي باور بوينت بالإضافة إلى الغرض من وثيقة إطار الإدارة البيئية والاجتماعية. كما تم إبلاغ الحاضرين عن المدير العام ودعوتهم لمشاركة أفكارهم وأسئلتهم ومخاوفهم لاحقاً من خلال القنوات المختلفة المتوفرة أثناء العرض حيث لم يتم تقديم أي تعليق رئيسي أثناء الاستشارة. كان المشاركون يمثلون وزارة الصناعة (MoI)، ومعهد البحوث الصناعية (IRI)، ومجموعة المطاحن، ومنتدى المنظمات غير الحكومية الإنسانية والتنمية (LHDF)، واتحاد التخليص الجمركي.

### آلية التظلم

أنشأت وزارة الاقتصاد والتجارة على موقعها الإلكتروني سجل الشكاوى ويمكن استخدام إطار السجل هذا دون الحاجة إلى تعديل. يتم تكليف أربعة موظفين متخصصين بجمع الشكاوى ويعملون خلال ساعات العمل الرسمية. يمكن تكييف GM للاستجابة بشكل أفضل لمتطلبات المعيار البيئي والاجتماعي 10 (ESS10). يجب تعديل آلية التظلم من أجل (1) مساعدة الفئات الضعيفة على رفع شكاواهم إلى نقابة المحامين في بيروت، و (2) استخدام مسار الإحالة في

حالة تقديم شكوى تتعلق بـ SEA / SH و (3) يجب تقديم الشخص الذي يرفع التظلم مع إقرار الاستلام. (4) يجب على الشخص الذي يتعامل مع الآلية العالمية إبلاغ نقطة الاتصال البيئية والاجتماعية بالمظالم ذات الصلة وستقوم نقطة الاتصال البيئية والاجتماعية بدعم من المستشار البيئي والاجتماعي الذي سيتم تعيينه بمتابعة المظالم ذات الصلة.

### إجراءات إدارة العمل

تتضمن خطة الإدارة البيئية والاجتماعية هذه LMP التي تحدد النهج الرئيسي لإدارة عمال المشروع وفقاً لمتطلبات القانون الوطني والمعياري البيئي والاجتماعي 2 (ESS2) الخاص بالبنك الدولي بشأن العمل وظروف العمل. الغرض من LMP هو تحديد متطلبات العمل الرئيسية والمخاطر المرتبطة بأنشطة المشروع، بما في ذلك الحفاظ على بيئة عمل آمنة للعمال (ترد التفاصيل في القسم 9).

## Executive Summary

This Environmental and Social Management Plan (ESMP) is prepared for Lebanon Wheat Emergency Response Project (P178866). It provides (i) a description of the project, (ii) the institutional and legal framework, (iii) the environmental and social baseline, (iv) the environmental and social risks and impacts assessment and mitigation measures, (v) the monitoring plan, (vi) the consultations and information disclosure and (vii) the Grievance Mechanism (GM). It includes also the Labor Management Procedures (LMP) for the Project. The overall Environmental and Social Risk Classification of the Project is substantial. The environmental risks are considered moderate, and the social risks are considered substantial. The ESMP was prepared in accordance with the World Bank Environmental and Social framework (ESF) and is implemented by the Ministry of Economy and Trade (MOET). There is a stand-alone Stakeholder Engagement Plan (SEP) that was prepared and publicly disclosed. An Environmental and Social Commitment Plan (ESCP) for the project has also been prepared and publicly disclosed, with a high-level commitment of the Government to mitigate/manage the adverse environmental and social risks and impacts of the project. The Project duration is one year, securing about 4-5 months of wheat supplies.

The Components of the Project are:

- 1 Component 1: Financing immediate wheat import needs and maintaining bread access for poor and vulnerable population groups (US\$ 147.5 Million): It is expected that the project would be able to help procure approximately 250,000 metric tons of wheat. This will allow maintaining food security for approximately 6.8 million Lebanese including close to 1.5 million refugees and asylum seekers over a period of 3 to 5 months. Procurement of wheat will be conducted through private sector importers following commercial practices. Ministry of Economy and Trade (MOET), the implementing agency, will sign Framework Agreements with selected wheat importers who comply with the World Bank eligibility requirements and meet the predefined qualification criteria, to act as intermediaries under this project.
- 2 Component 2: Project management and capacity building (US\$ 2.5 Million): This component will finance all aspects of project management, including equipment and materials, compliance with fiduciary, procurement, and ESF requirements, monitoring and evaluation, and impact assessment, knowledge management and communication.

### ***Policy, Legal and Institutional Framework***

The main laws and regulations relevant to the Project are related to: (i) Environment such as Lebanese law 444/2002 or code of the Environment and Lebanese decree 8633/2012 or EIA Decree, (ii) Solid and hazardous wastes such as law 80 dated 2018 on integrated solid waste management (iii) Decision 6/1 – 2022 on National Standards for Environmental Quality, (iv) Labor and Occupational Health and Safety (OHS) such as labor law dated 1946 and its amendments, law 335 dated 2001, law 400 dated 2002, decree 8987 dated 2012, decree 11802 dated 2004, decree 9129 dated 2022 and (v) Social regulations including Penal Code Decree 340 dated 1943, law 205 dated 2020, law 28 dated 2007 and decree 6940 dated 2020.

Lebanon is signatory of many international agreements such as the Basel Convention (Ratified by law 387/1994, 29/2015), the Kyoto Protocol of the United Nations Framework Convention on Climate Change (Ratified via Law No. 738/2006), , the Stockholm Convention (Ratified by law 432/2002), the Barcelona Convention Signature (Acceded by Decree Law No. 126 30/6/1977 Amendments Adhesion Law No.34 16/10/2008) and the UNFCCC (Ratified Law No.359 11/8/1994)

The Environmental and Social Framework (ESF) of the World Bank applies to the Project. Six out of the ten Environmental and Social Standards (ESSs) of the ESF are relevant to the Project and their requirements apply. They are: ESS1: Assessment and Management of Environmental and Social Risks and Impacts, ESS2: Labor and Working Conditions, ESS3: Resource Efficiency and Pollution Prevention and Management, ESS4: Community Health and Safety, ESS6: Biodiversity Conservation and Sustainable management of Living Natural Resources and ESS10: Stakeholder Engagement and Information Disclosure.

Several institutions will be involved in the implementation of the Lebanon Wheat Emergency Response Project. They include the MOET and other public institutions and ministries, UN Agencies, The Lebanese Red Cross (LRC) and International Federation of Red Cross and Red Crescent Societies (IFRC), the association of millers, the union of bakeries, the chamber of Commerce Industry and Agriculture and the Lebanese shipping agencies.

### *Environmental and Social Baselines*

This nation-wide project is defined to procure wheat for the population all around Lebanon. However, the project boundaries are limited to the premises of the Port of Beirut (PoB) and Port of Tripoli (PoT), therefore, the milling and distribution will be outside of the project boundaries. The PoB is located at the northern part of Beirut city on the coast of the Mediterranean Sea. The marine area of the port is confined with 2 main breakwaters that limit the wave activity inside the port basins, and, hence, limit the circulation between the basins and the open sea. The infrastructure in the PoB has been severely affected by the explosion that occurred in August 2020, including the infrastructure for offloading grains. The silos, with storage capacity of 120,000 tons of wheat, were totally destroyed along with the conveying machinery that was used to directly unload shipments from vessels at the berth to silos. Currently the unloading of wheat is carried out using mobile cranes and clamshell buckets, and usually directly loading trucks which transport the wheat to mills. The PoB area, and surroundings, is a highly urbanized area. The land use in the direct surroundings of the PoB is mainly industrial with some residential areas a few hundred meters from the port fence. The PoT is located at the northern part of Tripoli city, second largest city in Lebanon. The port has limited grains storage capacity. The PoB has a fishing port on its western border, and the direct surrounding land use is mainly industrial with a nearby residential area next to its eastern border. Tripoli dumpsite and Tripoli wastewater treatment plant -that is currently not fully operational- are located near the western border of the port.

In terms of air quality, in Lebanon, the levels of gas pollutants, Particulate Matters (PMs) and their chemical contents, and Volatile Organic Compounds (VOCs) exceed the WHO recommended limits for yearly averages as reported in the Lebanon [State of the Environment Report](#) (SOER-2020). The biological environment at the PoB is polluted as a result of occurring activities, the proximity of untreated wastewater outfalls and haphazard open dumpsite solid wastes. The explosion has also impacted the environmental conditions in the port as some of the warehouses released the stored materials, and some vessels sank and caused release of some pollutants to the marine environment. Because of the quantities of solid wastes dumped in the landfill and of wastewater discharged in the sea without treatment, the PoT is also a heavily polluted area. For firefighting, both ports rely on Fire Brigades that are located a few hundred meters from the port.

Prior to August 2020 PoB blast, about 85% of the cereals arriving in Lebanon used to pass by Beirut's Port silo. The other 15% are received directly by private companies. After the PoB massive explosion, the different parties involved in the wheat supply chain had to improvise to keep it functional. Below are the main steps and processes that are currently followed in the unloading of the wheat vessels.

- **Fumigation of trucks:** The specialized company [Yellow tech](#) is responsible for sterilizing trucks used for the transport of grains from the PoB. However, the process of sterilization could benefit from lots of improvements

- **Wheat unloading:** The wheat is unloaded from the ship using a hauler. The hauler then travels from the ship into a funnel where wheat is discharged in sanitized trucks. During this process, there is massive dust generation and lots of grains wastage. None of the public institutions are continuously monitoring the unloading process. In addition, most of the machinery used during the unloading is rusted and in bad condition and oil spills may occur and Occupational Health and Safety (OHS) measures are almost non-existent for workers
- **Transport of Wheat to miller:** All trucks are covered before leaving the Port.

The demographic profile and socio-economic environment of Lebanon is characterized by hosting the highest per capita concentration of refugees in the world, although being a small country of 6 million people. The latest estimates by the GOL show that the country hosts 1.5 million displaced Syrians, along with 31,502 Palestinian refugees from Syria, and a preexisting population of more than 277,985 Palestinian refugees<sup>1</sup>. It is estimated that 34 percent of Lebanese people and 50 percent of refugees were food insecure in 2021. Bread is the single largest item in the Survival and Minimum Expenditure Basket (SMEB) in Lebanon, as calculated by the World Food Program (WFP) in 2020<sup>2</sup>. Around 88 percent of Syrian refugee households fall below the SMEB. Poor, vulnerable households and refugees are the most impacted by any disruption of the wheat value-chain. Due to the deteriorating economic and financial situation, socio-economically vulnerable groups will face more and more difficulties meeting their basic needs, including food. The Lebanon Multidimensional Poverty Index (MPI) was developed by the Central Administration of Statistics (CAS) and the WB and published in 2022. It is based on the notion that poverty is not simply about a person or household having low income but encompasses a broader set of factors such as lack of clean water or electricity, poor quality of work or limited schooling. The 2019 MPI for Lebanon reveals that 53.1 percent of residents in Lebanon were multi-dimensionally poor. The extreme poor amount to 16.2 percent of the population<sup>3</sup>.

The total agricultural land area in Lebanon is estimated at 332,000 ha, of which 231,000 ha are cultivated (almost half of the area is irrigated), with an average rain-fed landholding size of 1.36 ha and irrigated holding size of 1.23 ha. Permanent crops cover 54% of the total cropland, followed by temporary crops at 44%, and protected agriculture (greenhouses) that accounts for 2% of the total cropland in Lebanon<sup>4</sup>. Wheat is planted in November-December and is harvested in June. The total area cultivated with wheat is approximately 40,000 hectares. 85 percent of the cereal production of Lebanon is in the Beqaa, Baalbeck-Hermel and Akkar governorates. The average production is 3 tons per hectare<sup>5</sup>.

Following the multiple crises that Lebanon has been facing for the past few years, the amount of violence against children and women has significantly increased. With increased socioeconomic needs and vulnerabilities in addition to preexisting societal norms and differences attributed to males and females, women have become more susceptible to domestic violence, sexual harassment, sexual exploitation and abuse with increased barriers to access services and opportunities. During COVID 19, stress, the disruption of social and protective networks, loss of income and decreased access to services all can exacerbate the risk of violence for women. In the first quarter of 2020, Lebanon indicated a 4%

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<sup>1</sup> Lebanon Crisis Response Plan, 2017-2020 <https://lebanon.un.org/en/172232-2022-lebanon-crisis-response-plan-lcrp>

<sup>2</sup> <https://docs.wfp.org/>

<sup>3</sup> CAS and the World Bank (2022), Lebanon Multidimensional Poverty Index 2019 available on <http://www.cas.gov.lb/images/PDFs/Poverty/Lebanon%20MPI%202019%20Report%20%20EN.pdf>

<sup>4</sup> FAO (2020). Special Report – FAO Mission to Assess the Impact of the Financial Crisis on Agriculture in the Republic of Lebanon. <http://www.fao.org/3/cb1164en/cb1164en.pdf>

<sup>5</sup> Idem



increase of intimate partner violence compared to the same time period in 2019<sup>6</sup>. In addition, as a result of the PoB blast, some of the health care centers were impacted thus service provision for women particularly was also impacted.

### ***Potential Environmental and Social Risks and Mitigation Measures***

Potential adverse environmental risks and impacts associated with the project are:

- (a) **Dust emissions and fumigations:** During offloading, while moving the wheat by the clamshell buckets from vessels, organic dust may be generated and could harm the workers and to a lesser extent the air quality.
- (b) **Food Safety and Storage Management:** There are some risks related to food safety in case the imported wheat contains some fungi or related toxins, or some remains from the fumigation activities during the upstream loading at sources and in transit. There are biological factors responsible for storage losses such as moisture content, insects, pests, microorganisms, and rodents. Before storing wheat grain, it must be dried to a proper level of moisture content; otherwise, many problems such as germination and loss of eating quality may occur. If wheat falling on the ground during unloading activities is recollected and used for human consumption, it may constitute a risk to food safety.
- (c) **Emergency Situations and Fire:** The sanitization truck carries a diesel tank. Therefore, there is a risk of fire that may endanger the workers' lives, especially if the truck is not well equipped with firefighting equipment and if proper fire prevention measures are not taken.
- (d) **Occupational Health and Safety Risks (OHS):** The unloading of the wheat from the vessels will be associated with limited OHS risks to the port workers caused by the moving objects and the sanitization process is associated with risks of burns or injuries to workers.
- (e) **Potential car accident during transportation:** There are some risks of road safety issues related to transporting the wheat from the ports to the mills. The inappropriate utilization of safety measures by road users plays a vital role in increasing road injury morbidity and mortality. Moreover, distracting behaviors often act as a catalyst that escalates the risk of being involved in road collisions. Road accidents can also be due to a lack of vehicle maintenance.

Potential adverse social risks and impacts associated with the project are:

- **Labor risks:** Given the nature of the Project intervention, the key labor risks which may be associated with the project are limited and they include risks on Project workers related to labor and working conditions that are not compliant with either the Lebanese Labor Law or ESS2.
- **Potential child labor and forced labor engaged by primary suppliers** which are trading companies,
- **Inaccessibility to certain vulnerable groups:** The project may have a lack of considerations for differentiated treatment for vulnerable groups such as elderly, people pre-existing conditions, the young and people with disabilities that may not be capable of accessing bread. This may be partly due to smuggling of subsidized wheat which may hinder the access for the most vulnerable populations to affordable bread.
- **Risks associated with the transition from current wheat subsidy system to a more market-oriented system:** Additional social risks are associated with the consultancy services and technical assistance under component 2 that will help in MOET's planned transition from the current wheat subsidy system to a more market-oriented system.

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<sup>6</sup> <https://reliefweb.int/report/lebanon/impact-covid-19-sgbv-situation-lebanon-inter-agency-sgbv-task-force-lebanon-may-2020>

- **Gender-Based Violence (GBV) and sexual harassment, exploitation, and abuse (SEA):** Gender inequalities and norms can play a key role for access to bread. Moreover, current COVID-19 pandemic and deteriorating economic situation can create or exacerbate the conditions that especially put women and girls at greater risk of SEA/H. For instance, women and girls may be forced into exchanging sexual favors for access to food or even bread.

Mitigation measures include (i) Using appropriate Personal Protective Equipment (PPE), (ii) implement OHS guidelines, (iii) ensuring wheat is meeting the food safety standards, (iv) Ensuring proper storage and adopting needed fire prevention measures (v) ensuring preparation of Emergency Preparedness and Response Plan including fire emergency management plan (vi) Respect traffic rules, (vii) Request the wheat importers to sign a declaration where they confirm that they do not engage any child nor forced labor in their activities and that the wheat has not been procured from areas where significant degradation of natural habitats took place (viii) Design, implement and maintain an efficient GM to handle complaints and concerns for all the Project workers including referral pathways for SEA/SH and the communities (ix) follow up closely on the categories of people receiving bread, and (x) Engaging in inclusive consultations with all identified stakeholders including vulnerable groups like refugees.

### ***Monitoring***

To ensure that the mitigation measures are contextualized and properly implemented, the Project activities will be monitored by MOET. MOET shall maintain the assigned Environmental and Social (E&S) focal point who will support management of environmental, social and health & safety (ESHS) risks of the project. Accordingly, the MOET assigned E&S focal point should be provided by adequate training on: (i) ESF and effective operation of a grievance mechanism including the referral pathways for SEA/SH and the communities, (ii) Stakeholder mapping and engagement and (iii) Emergency preparedness and response. During implementation, the MOET assigned E&S focal point will ensure implementation of the E&S requirements outlined in the ESCP, SEP and ESMP. H/She shall conduct regular field visits to monitor the E&S activities implemented by Contractors and ensure that the E&S requirements are integrated into the contracts with the suppliers and document. MOET assigned environmental and social focal point shall 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, stakeholder engagement activities, and functioning of the GM(s), including but not limited to grievance logs and the MOET shall promptly notify the World Bank of any incident or accident related to the Project as per the cleared and disclosed ESCP.

### ***Consultation and Information Disclosure***

As per the requirements of ESS10, and as outlined in the SEP, the MOET will conduct broad and open public consultations with Project stakeholders that are impacted or likely to be impacted directly or indirectly, positively, or adversely, by the Project and that may have an interest in the Project. Consultations took place before and during the preparation of the ESMP as per the following steps.

Initial stakeholders' identification and consultation was conducted during the preparation phase in March 2022 followed by consultations with mills owners at MOET on March 17, 2022. The parties that were present included MOET, 3 mills and the World Bank. The main outcomes of the consultation are (i) Millers pick the sellers through brokers. The brokers shop around based on requirements specified by the millers, (ii) The current total storage capacity of the Country is 125,000 tons (silos and warehouses) which is worth 2 months of consumption (iv) Imports are in the range of 50-60,000 tons per month, (v) Since Russian-Ukrainian war, the prices of wheat increased and fluctuated between 460-520 USD per ton and (vi) the importers/millers indicate that they are able to secure shipments for Lebanon, but because of substantial delays from the central bank, may not be able to purchase the wheat.

Another consultation took place on June 9, 2022 as part of the ESMP. Invitations to stakeholder's consultation were sent on Thursday, June 2, 2022 via email with the draft presentation attached (Refer to [Annex B](#)). MOET extended the invite to fifty identified stakeholders. The consultation was conducted in line with available resources for carrying out stakeholder engagement in the context of COVID-19 and the WB's "Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings" dated March 20, 2020. The Project components associated environmental and social risks, impacts and mitigation measures were explained in a Power Point Presentation in addition to the purpose of the ESMF document. The attendees were also informed about the GM and invited to share their thoughts, questions and concerns later through the different channels provided during the presentation as no major comment was given during the consultation. Participants were representing the Ministry of Industry (MoI), the Industrial Research Institute (IRI), the group of millers, Lebanon Humanitarian & Development NGOs Forum (LHDF), Customs Clearance Union

### ***Grievance Mechanism***

MOET has already established on its website a complaints [log](#) and this log frame can be used without a need of adaptation. Four dedicated officers are mandated to collect complaints and they operate during the official working hours. The GM can be adapted to respond better to the requirements of the ESS10. The GM should be amended to (i) assist vulnerable groups to raise their grievances to the Beirut Bar Association, (ii) use a referral pathway in case of complaint related to SEA/SH and (iii) the person raising the grievance shall be provided with an acknowledgement of receipt, (iv) the person handling the GM shall inform the environmental and social focal point of relevant grievances and the environmental and social focal point with the support of the environmental and social consultant that will be hired will follow up on the relevant grievances.

### ***Labour Management Procedures***

This ESMP includes LMP that sets out the principal approach to manage project workers in accordance with the national law requirements and the World Bank's ESS2 on Labor and Working Conditions. The purpose of the LMP is to identify the main labor requirements and risks associated with the project activities, including maintaining a safe working environment for workers (details are provided in Section 9)

## 1- Background

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Lebanon's compounding crises pose long-term challenges for the country. In 2019, Lebanon faced an economic and financial crisis due to a stop in capital inflows, which led to systemic failures across the banking sector, debt, and the exchange rate. A shortage of United States (US) dollars in the market resulted in multiple exchange rates, as well as informal restrictions and control mechanisms on deposits held in US dollars and on transfers out of the country. On another side, the Port of Beirut (PoB) explosion in August 2020 had significant negative economic impacts, including the loss of wheat silos, placing further strain on the economy and food security. The COVID-19 pandemic and subsequent lockdowns exacerbated the situation, directly affecting people's health, livelihoods, and food security.

Lebanon relies heavily on food import. 80 percent of wheat consumed in the Country is imported, of which 96 percent was imported either from Russia or Ukraine. The impact of the military conflict in Ukraine is reverberating across continents, particularly affecting the fragile economy and food security of Lebanon. As a result of the Ukraine-Russia crisis, grain prices are continuing to increase on global markets; wheat prices have already reached 50 per cent above early February levels. Current wheat reserves in Lebanon cover approximately one month of consumption, stored in 11 mills. As the country reels under anemic foreign exchange reserves, surging inflation and alarming poverty levels, more families will be struggling for mere survival if the food insecurity risk is not promptly addressed and mitigated<sup>7</sup>.

The Emergency Response in Support of Wheat Imports Project (P178866) is proposed to address the issue of wheat security in Lebanon. It has the following Project Development Objectives (PDO): "to ensure the availability of wheat in Lebanon, in response to the economic impact of the Ukrainian conflict, and to enable emergency access to affordable bread by poor and vulnerable households" It has a total duration of one year and a total budget of US\$150 Million securing about 4-5 months of wheat supplies.

The overall Environmental and Social Risk Classification of the Project is substantial. The environmental risks are considered moderate, and the social risks are considered substantial. This ESMP is prepared in accordance with the World Bank Environmental and Social framework (ESF) and includes Labour Management Procedures (LMP). There is a stand-alone Stakeholder Engagement Plan ([SEP](#)) that was prepared and publicly disclosed. An Environmental and Social Commitment Plan ([ESCP](#)) for the project has also been prepared and publicly disclosed, with a high-level commitment of the Government to mitigate/manage the adverse environmental and social risks and impacts of the project.

This Environmental and Social Management Plan (ESMP) comprises the following sections:

- Background
- Project description
- Policy, legal and institutional framework
- Environmental and social baseline,
- Potential environmental and social risks and impacts assessment and mitigation measures,
- Monitoring plan,
- Consultations and information disclosure
- Grievance mechanism
- Labor management procedure

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<sup>7</sup> Communication with MOET during Project appraisal

## 2- Project Description

The Emergency Response in Support of Wheat Imports Project has the following 2 components:

### **Component 1: Financing immediate wheat import needs and maintaining bread access for poor and vulnerable population groups (US\$ 147.5 Million)**

The component will finance immediate wheat purchases to avoid the disruption of imports in the short term, and its dire socioeconomic implications. This will be done in accordance with Operation Manual/Bank Procedures (OP/BP 10.00) and the Instructions: Preparation of Investment Project Financing (IPF): Situations of Urgent Need of Assistance or Capacity Constraints.

While market conditions and price developments are difficult to anticipate in the following months, it is expected that the project would be able to help procure approximately 250,000 metric tons of wheat. This will allow maintaining food security for approximately 6.8 million Lebanese including close to 1.5 million refugees and asylum seekers over a period of 3 to 5 months. Procurement will aim to ensure regular and adequate monthly supply (on par with current levels) and avoid disruptions and shortages in wheat availability on the Lebanese market. It is particularly important, given the current global market and domestic financial pressures, to ensure continuity in wheat supply immediately after project effectiveness.

Procurement of wheat will be conducted through private sector importers following commercial practices. The Ministry of Economy and Trade (MOET) will sign framework agreements with selected wheat importers who comply with the World Bank eligibility requirements and meet the predefined qualification criteria, to act as mediators under this project.

The project will equally focus on safeguarding access to affordable bread for poor and vulnerable households, including refugees. These households will be targeted and selected, based on the combined databases maintained by World Food Program (WFP) (for poor Lebanese households identified under Emergency National Poverty Targeting Program Project (NPTP)/ Emergency Social Safety Net Project (ESSN) Projects and United Nations High Commissioner for Refugees (UNHCR) (for refugees). If wheat availability is ensured in Lebanon and bread pricing policy remains unchanged, any systemic challenges to access affordable bread by vulnerable and poor households would likely be due primarily to economic/income constraints at household level. The complementary activities described under Component 2 will help inform the most effective and fiscally responsible solutions, but it is likely that they will have to rely on a close articulation with and further scaling up of targeted support through the social security net mechanisms. Such mechanisms are currently being implemented through the World Bank-financed ESSN (ongoing, and targeting the extreme poor), and through the Emergency Broad Coverage Cash Transfer Project (in the pipeline and designed to benefit a broader population group).

### **Component 2: Project management and capacity building (US\$ 2.5 Million)**

This component will finance all aspects of project management, including equipment and materials, compliance with fiduciary, procurement (including internal controls and auditing), and Environmental and Social Framework (ESF) requirements (including a citizen engagement mechanism and a strengthened Grievance Mechanism (GM) for better risk management), monitoring and evaluation, and impact assessment, knowledge management and communication.

The component will specifically finance mechanisms to improve the mitigation of risks associated with wheat imports and access to affordable bread under Component 1. To address fiduciary risks and ensure the integrity of the wheat procurement process, it will finance semi-annual financial audits focused on participating importers. To address technical risks, such as misuse or misappropriation of project-financed wheat imports, the project will finance consultancy services and technical assistance to strengthen the role of the consumer protection agency under MOET and of Lebanon's Central Inspection agency, as well as Third-Party Monitoring Agency (TPMA), such as mobilization of Red

Cross Volunteers with the Lebanese Red Cross/International Federation of Red Cross and Red Crescent Societies. At the same time, the project will finance high frequency ‘Listening to Poor and Vulnerable Household Surveys’, entailing data collection on bread prices and consumption for the poor and vulnerable households, by conducting random sampling and surveying (biweekly) using UNHCR and WFP beneficiary lists. This information will be triangulated at MOET level with information consolidated from the consumer protection agency, GM, and WFP price monitoring system, and used to adopt appropriate remedies. All monitoring reports will be published on Central Inspection’s [IMPACT online platform](#).

This component will also support consultancy services and technical assistance that will strengthen MOET’s capacity to manage the transition from the current wheat subsidy system to a more market-oriented system.

## 3- Policy, Legal and Institutional Framework

Below are the national and international legal and regulatory provisions directly relevant to the activities being carried out in the project.

### **3.1 National Legislation**

The following is a summary of relevant national legislations.

#### ***Environment***

##### *Lebanese law 444/2002*

The Code of the Environment forms the legal basis for environmental management in Lebanon, for the principles mentioned below and the Environmental Impact Assessment (EIA) system.

##### *Lebanese decree 8633/2012*

Decree 8633/2012 “The EIA decree”, requires projects mentioned in its annexes to either undergo an EIA or an Initial Environmental Examination (IEE). It describes the process required for preparing an EIA or an IEE and the timeline for responses and approvals from the Ministry of Environment (MOE).

#### ***Solid and Hazardous Wastes***

##### *Law 80 – 2018 Integrated Solid Waste Management Law*

Sets the framework for Integrated Solid Waste Management based on the principles of Law 444/2002.

##### *Decision 59/1 - 2020*

The decision specifies the procedures and principles for hazardous waste storage facilities licensing in Lebanon.

#### ***National Standards for Environmental Quality***

*Decision 6/1 – 2022 that supersedes Decision 8/1 2001 National Standards for Environmental Quality.* This decision provides Environmental Limit Values (ELV) for air discharges.

#### ***Labor and Occupational Health and Safety (OHS)***

##### *Labor Law 1946 and its amendments*

This law sets basic labor rights in Lebanon such as minimum working age, working and resting hours, etc....

##### *Law 335 – 2001: Ratification of International Labor Organization (ILO) convention No. 182:*

This text does not allow the employment of children and protects them from engaging in any work activities that could harm their health and safety.

##### *Law 400 – 2002: Ratification of ILO convention No. 138:*

Minimum age of employment on tasks and works that pose risks or hazards to health and safety.

*Decree 8987 – 2012*

Prohibits the employment of minors under the age of 18 in work that may harm their health, safety or morals.

*Decree 11802 – 2004*

This decree regulates occupational prevention, safety and health in all enterprises subject to the code of labor.

*Decree 9129 - 2022*

Cost of living allowance for employees and workers

**Social Laws***Penal Code Decree 340 1943*

The text of Article 522 of the Lebanese Penal Code applies to cases of assault of women, by force, violence, and manipulations which are acts that affect a woman's dignity, physical health, psychological state, and moral integrity.

*Law 205 – 2020*

This law criminalizes the sexual harassment. Anyone who commits a crime of sexual harassment shall be punished by imprisonment from one month to one year and a fine ranging from three times to ten times the official minimum wage, or one of these two penalties.

*Law 28/2007 and Decree 6940/2020 (2007 and 2020)*

Pursuant to Decree 6940 of 2020 all public institutions were instructed to activate administrative self-monitoring and to enhance transparency and positivity in the communication between the administration and the citizens, within one month from the date of the circular. According to Law 28/2007, the administration that receives a request for information must immediately acknowledge receipt and respond within 15 days, which can be extended for another 15 days if the request is complex. The administration should provide a written justification if it can't provide the requested information, and the citizen can appeal against this decision within two months

**3.2 International Agreements***The Basel Convention (Ratified by law 387/1994, 29/2015)*

The Basel Convention on the control of transboundary movements of hazardous wastes and their disposal. The Basel Convention's main objectives are:

- to reduce the production of hazardous waste
- to treat and dispose of hazardous waste at the nearest possible place from the source and
- to reduce transboundary movements of hazardous waste.



In 2015 hazardous waste export to and from Organization for Economic Co-operation and Development (OECD) countries has been banned. This convention is applicable to the Project in case transported wheat needs to be fumigated.

*The Kyoto Protocol of the United Nations Framework Convention on Climate Change (Ratified via Law No. 738/2006)*

In 1997, the Kyoto Protocol was concluded and established legally binding obligations for developed countries to reduce their greenhouse gas emissions. Being a Non-Annex 1 party of the United Nations Framework Convention on Climate Change (UNFCCC), Lebanon is required to periodically prepare GHG inventories as part of its National Report/ Communication to the UNFCCC and must report on the steps it is taking or envisage undertaking to implement the Convention.

*The Stockholm Convention (Ratified by law 432/2002)*

The Stockholm Convention on Persistent Organic Pollutants (POPs) is “a global treaty to protect human health and the environment from chemicals that remain intact in the environment for long periods, become widely distributed geographically, accumulate in the fatty tissue of human and wildlife and have harmful impacts in human health or on the environment”.

*The Barcelona Convention Signature (Acceded by Decree Law No. 126 30/6/1977*

*Amendments Adhesion Law No.34 16/10/2008)*

The Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean, originally the Convention for Protection of the Mediterranean Sea against Pollution, known as the Barcelona Convention, is a regional convention that was adopted in 1976 and amended in 1995 to prevent and reduce pollution from land-based sources, ships and aircraft in the Mediterranean Sea.

*The UNFCCC (Ratified Law No.359 11/8/1994)*

The United Nations Framework Convention on Climate Change (UNFCCC) entered into force on 21 March 1994. From the handbook of the Convention (2006), according to Article 2, the Convention’s ultimate objective is “to achieve, in accordance with the relevant provisions of the Convention, stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system”.

### **3.3 World Bank Environmental and Social Framework and Guidance**

The Environmental and Social Framework (ESF) of the World Bank <sup>8</sup>became effective on October 1, 2018 and applies to all Investment Project Financing (IPF) initiated after this date. It tackles among others, the issues of labor, non-discrimination, climate change mitigation and adaptation, biodiversity, community health and safety, and stakeholder engagement including public participation and grievance mechanisms. Six out of the ten Environmental and Social Standards (ESSs) of the ESF, are relevant to the Project and their requirements apply as shown in the following table 1.

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<sup>8</sup> <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>

**Table 1: ESS relevant to the Lebanon Wheat Emergency Response Project**

No. and Designation	Relevance to the Project	Justification	Gap between ESS and National Legislations relevant to the Project <sup>9</sup>
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Relevant	This ESS is relevant. As there will be some identified environmental and social risks These need to be managed through the Environmental and Social Management Plan (ESMP). An <a href="#">ESCP</a> was prepared and disclosed during Project's appraisal <sup>10</sup> .	<ul style="list-style-type: none"> <li>• As per the EIA Decree, the definition of risks is not clear, including direct, indirect, cumulative and induced risks and impacts.</li> <li>• The boundaries of the environmental assessment are not well-defined and the impacts of associated activities are not covered in the Decree.</li> </ul> <p>Adoption of mitigation hierarchy is not explicit in the legal requirements but could be tied to the requirements for developing an Environmental Management Plan (EMP) or Environmental and Social Monitoring Plan (ESMP). The EIA Decree does not have clear requirements, except if demanded by MoE during the EIA scoping, for covering cumulative impact assessment and environmental modeling</p>

<sup>9</sup> Based on: "World Bank. 2022. Implementing the Environmental and Social Framework in Lebanon. Analysis of Environmental Risks, Capacities and Challenges. World Bank."

<sup>10</sup> <https://www.economy.gov.lb/ar/announcements/environmental-and-social-commitment-plan-escp---lebanon-emergency-wheat-supply-response-project>

No. and Designation	Relevance to the Project	Justification	Gap between ESS and National Legislations relevant to the Project <sup>9</sup>
ESS2: Labor and Working Conditions	Relevant	<p>This Project will not involve any civil works, but its activities will involve government staff, civil servants as they will retain their original contractual agreements therefore ESS2 will not apply to such civil servants, except for the provisions of paragraphs 17 to 20 (protecting the Work Force) and paragraphs 24 to 30 (OHS). The Project will involve also contracted workers, who will assume responsibilities in the supply of wheat (wheat offloading) or who will be engaged in monitoring activities. Consultants will also be needed for technical assistance and consultancy services. To manage the potential risks related to labor involved, Labor Management Procedures (LMP) are prepared as part of this ESMP to address relevant aspects of ESS2. (<a href="#">Refer to this link section 9</a>)</p>	<ul style="list-style-type: none"> <li>Lebanon's Labor Code covers to a certain extent the main requirements of ESS2. The most significant legal gap is that some categories of workers (such as those working in agriculture and foreign workers) are excluded from the labor code. Employees in the public sector are regulated by Civil Servants' Regulation and the Establishment of the Central Investigation Office, and not by labor law. The Labor Code does not explicitly require conducting hazard identification and mitigation for different activities, training workers on managing all risks they are likely to be exposed to, preparing emergency procedures, and giving workers the right not to perform dangerous works without retaliation.</li> </ul>
ESS3: Resource Efficiency and Pollution Prevention and Management	Relevant	<p>There will be some dust emissions while offloading the grains. This ESMP will identify measures to bridge any gaps between the existing procedures and the requirements of ESS3 and Environmental Health and Safety Guidelines (EHSG).</p>	<p>Overall, since resource efficiency and pollution prevention are major concerns for the country, Lebanon has enacted several regulatory instruments, policies, and strategies that tackle these issues. However, without considering non-legally binding policies and strategies, the national legislation carries some gaps with ESS3.</p>

No. and Designation	Relevance to the Project	Justification	Gap between ESS and National Legislations relevant to the Project <sup>9</sup>
ESS4: Community Health and Safety	Relevant	The MOET will implement World Bank guidelines on COVID 19 safety and other community health and safety standards, as applicable, which will guide all interactions during implementation. Also, the ESMP will include measures to ensure that the imported wheat is meeting the food safety standards and that analysis are taken to ensure the grains are free from any fungus diseases or toxins. The SEA/SH risk assessment is low. Respective SEA/SH risk mitigation measures will be prepared for low risk as per the World Bank Good Practice Note and incorporated in this ESMP. There will be no security personnel involved in the project	National legislation has some gaps with ESS4 mainly because ESS4 health and safety requirements regarding community and vulnerable groups do not always find an equivalent measure in national regulations. Gaps are illustrated by the 2020 Beirut PoB explosion catastrophe.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not Relevant		

No. and Designation	Relevance to the Project	Justification	Gap between ESS and National Legislations relevant to the Project <sup>9</sup>
ESS6: Biodiversity Conservation and Sustainable management of Living Natural Resources	Relevant	Selling companies are not directly cultivating the wheat, the supply chain of wheat may indicate that the source of wheat is from areas of high risk for significant conversion of natural habitats. Although this risk is low, for wheat cultivation, the framework agreement between MoET and importers will require a declaration by the supplier that the wheat has not been produced from any areas where significant degradation of natural habitats took place. It is worth noting that during the existing fragile conditions in the grains market, the control that private sector mills have over suppliers is very limited, as the demand is currently much higher than supply.	Regulatory instruments are in place for the management of protected areas. However, the country does not have legal instruments for the safeguard of habitats outside of protected areas. In addition, standardized approaches for habitat categorization, wetland delineation, ecological flows, and biodiversity offsets are not part of the national legislation.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Relevant		
ESS8: Cultural Heritage	Not Relevant		
ESS9: Financial Intermediaries	Not Relevant		

No. and Designation	Relevance to the Project	Justification	Gap between ESS and National Legislations relevant to the Project <sup>9</sup>
ESS10: Stakeholder Engagement and Information Disclosure	Relevant	This ESS is relevant. The MOET has prepared a Stakeholders' Engagement Plan ( <a href="#">SEP</a> ) in which the stakeholders were identified. Initial stakeholders' identification and consultations were conducted during the preparation phase in March 2022 followed by consultations with mills owners. Another consultation took place on June 9, 2022 with stakeholders. MOET will conduct additional inclusive stakeholders' consultations with vulnerable groups before the start of project activities, update the SEP and will also ensure wide and effective dissemination of the project GM.	There is no requirement for project proponents, in the environmental assessment process, to engage with stakeholders, except if the project needs a full EIA, and this requirement is limited to the scoping phase. Stakeholder engagement takes place at the scoping and before disclosure of the EIA/SEA. There is no legal requirement to engage with stakeholders if significant changes occur. Also, there is no regulation that would ensure that vulnerable groups should be consulted on projects.

The project is expected to abide by the following guidance and good practice notes:

#### *Environmental, Health, and Safety (EHS)*

Environmental, Health, and Safety Guidelines ([EHS Guidelines](#)), General EHS Guidelines:

- Environmental: [Air emissions and ambient air quality](#)
- Environmental: [Hazardous and ambient air quality](#)
- [Community Health and Safety](#) /Traffic Safety Guidelines and Environmental Guidelines
- [Occupational Health and Safety](#)

#### *Policy of Access to Information*

This Policy governs the public accessibility to information in the WB's possession. The WB allows access to any information in its possession that is not on a list of exceptions.

This [Policy](#) is based on five principles:

- Maximizing access to information;
- Setting out a clear list of exceptions;
- Safeguarding the deliberative process;
- Providing clear procedures for making information available; and
- Recognizing requesters' right to an appeals process.

#### *Consultations Guidelines*

According to ESS10 consultations with stakeholders should be conducted throughout the life cycle of a project. The aim of the consultation is to present to the public the components of the proposed project along with potential environmental and social impacts and take their comments and concerns into consideration. The consultations guidelines are accessible through the following link [Consultations guidelines](#)

*Technical note on Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings (Ref to [Annex D](#))*

This note offers suggestions to World Bank task teams for advising counterpart agencies on managing public consultation and stakeholder engagement in their projects, with the recognition that the situation is developing rapidly, and careful regard needs to be given to national requirements and any updated guidance issued by WHO.

*Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works Good Practice Note*

The World Bank has developed this [Good Practice Note](#) (GPN) to assist Task Teams in identifying risks of SEA/SH – as opposed to all forms of Gender-Based Violence (GBV) that can emerge in IPF involving major civil works contracts – and to advise Borrowers on how to best manage such risks. The GPN builds on World Bank experience, relevant international instruments, and good international industry practices, including those of other development partners. While World Bank Task Teams are the primary audience, the GPN also aims to contribute to a growing knowledge base on the subject. GPNs are prepared to support the implementation of the ESF in World Bank financed operations. This

GPN, is designed to apply to major civil works but can also assist in addressing SEA/SH risks in projects that are currently under preparation.

### **3.4 Institutional Framework**

This section describes the responsibilities of the institutions that will be involved in the implementation of the Lebanon Wheat Emergency Response Project. The following institutions are of primary relevance given their mandate and responsibilities to the project:

#### **3.4.1 The Ministry of Economy and Trade ([MOET](#))**

The project will be implemented by the MOET, which oversees grain imports in Lebanon. The project will directly pay suppliers of wheat through procurement carried out by the private sector mills following the existing arrangements, and MOET will provide overall supervision of the process to ensure proper fiduciary arrangements. While no project implementation unit will be established, project implementation will rely on a designated MOET task team, with clearly assigned roles. MOET sets the flour and bread price control, protects the consumer and oversees wheat import supply chain, noting that MOET cannot have full control on wheat price for the latter is highly fluctuating, influenced by exchange market and by the current Russian-Ukrainian conflict. The General Directorate of Cereals and Sugar Beet (GDCS) at the MOET has an oversight that all requirements are met at the mills for the production of flour for human consumption. As per its mandate, MOET can inspect wheat and flour anytime through its consumer protection department.

#### **3.4.2 The Ministry of Industry ([MOI](#))**

All mills and agroindustry registered with MOI. MOI can ban agroindustry products from exports. The MOI licenses the operations of companies within Lebanon. This constitutes issuing an initial operating license and then an annual renewal. In addition, the Industrial Research Institute (IRI) under MOI performs the weekly and biweekly tests on wheat on behalf of the GDCS.

#### **3.4.3 The Ministry of Finance ([MOF](#))**

The MOF is the government authority in Lebanon responsible for collecting customs duties and controlling the flow of goods in and out of the country. Its role being the institution directly involved in financial approvals and in debt management. Customs, in co-operation with the Ministry of Agriculture (MOA), approve the cargo and issue appropriate documentation

#### **3.4.4 The Ministry of Agriculture ([MOA](#))**

The MOA is responsible for the inspection of the wheat cargoes as they arrive, prior to discharge in the ports and agricultural production technical support for farmers. The Lebanese Agricultural Research Institute's (LARI) laboratory located in Fanar (under MoA) is mandated the inspection of wheat imports. All mills can be inspected by the MoA to ensure standards are being met.

#### **3.4.5 The Ministry of Public Health ([MOPH](#))**

The MOPH is responsible in the context of food safety; which includes environment, food, cleanliness, contamination, infestation, rodent issues etc. The MOPH also checks that all workers operating in the food industry must undergo medical health checks every three months at a public hospital.

#### **3.4.6 The Ministry of Environment ([MOE](#))**

The MOE elaborates policies, strategies, plans and projects in all that relates to the safety of the environment and the sustainability of natural resources. It also prepares laws, standards and norms that the Project should abide with.



### **3.4.7 The Ministry of Labor ([MOL](#))**

The MOL is responsible for protecting the interests of workers in the Country and is dedicated to developing a healthy work environment for higher production and productivity.

### **3.4.8 The Ministry of Public Works and Transport ([MOPWT](#))**

The MOPWT and in particular the Directorate General of Land and Maritime Transport is responsible for setting, implementing and monitoring all policies related to land and maritime transport. MOPWT is also managing the Port of Beirut.

### **3.4.9 The Ministry of Interior and Municipalities ([MOIM](#))**

The MOIM is responsible for governorates, caza, municipalities, federation of municipalities and village matters and can facilitate reaching refugees and vulnerable groups.

### **3.4.10 The Lebanese Central Inspection Agency ([LCIA](#))**

The Central Inspection is responsible for:

- Overseeing public administrations and institutions and municipalities through different types of inspections.
- Seeking to improve administrative processes.
- Offering advice to administrative authorities voluntarily or upon request.
- Coordinating joint operations between different public administrations.
- Carrying out studies, investigations and missions assigned to it by authorities."

The LCIA plays a central role among oversight bodies serving the Executive Authority. It exercises its powers across all Lebanese territories to uncover any violation of the applicable laws and regulations. The LCIA also provides guidance, advice and recommendations to improve administrative processes and coordinate joint operations between public administrations.

### **3.4.11 UN Agencies**

The UN in particular the FAO, the WFP and the UNHCR can provide technical support for the MOET. FAO's role focuses on the promotion of sustainable development of the agriculture sector, in close collaboration with the MOA and other relevant ministries. More recently, FAO has been supporting the coordination and planning mechanism for humanitarian and stabilization assistance to Lebanon in the context of the Syria crisis. FAO's support focuses on agricultural and rural development, resilience and sustainable natural resource management. WFP and UNHCR have lists of beneficiaries and databases for vulnerable groups and WFP has a price monitoring system. These lists and data will be used by MOET to triangulate with information consolidated from the consumer protection agency and GM, and used to adopt appropriate remedies, such as including in the framework agreement a preferential distribution clause for bakeries located in areas where most of the poor and vulnerable groups are located.

### **3.4.12 The Lebanese Red Cross and International Federation of Red Cross and Red Crescent Societies**

The Lebanese Red Cross ([LRC](#)) is a humanitarian independent organization and an auxiliary team to the medical service of the Lebanese Army. It is considered as a strong local actor and auxiliary to the Lebanese authorities in the humanitarian field, and a major health service provider across Lebanon. The International Federation of Red Cross and Red Crescent Societies ([IFRC](#)) is the world's largest humanitarian network. Its secretariat supports local Red Cross and Red Crescent action in more than 192 countries, bringing together almost 14 million volunteers for the good of humanity. It also works to improve global humanitarian standards and persuade leaders to act in the interests of vulnerable people. The WB and the IFRC have had several agreements for the independent monitoring of Projects in Lebanon. Under these agreements, IFRC is playing the role of a Third Party Monitoring Agency (TPMA).

### 3.4.13 Association of Millers

The Association of Millers represents the 12 millers active in Lebanon. They are listed in the table below.

**Table 2:List of Millers active in Lebanon**

	Mill/Importer	Area
1	Assaf Modern Mills	Bchamoun, Mount Lebanon
2	Baraka Mills	Dora
3	Big Mills of the South	Sibleen, Mount Lebanon
4	Crown Mills	Corniche El Nahr, Beirut
5	Dora Flour Mills	Dora
6	Flour Mills of Bekaa	Bekaa
7	Lebanon Modern Mills	Corniche El Nahr, Beirut
8	Middle East Mills	Zouk
9	National Flour Mills	Tripoli
10	Shahbaa Mills	Ain El Sikke, Beirut
11	Société Industrielle du Levant/Bakalian	Quarantine, Beirut
12	Sumbula	Bekaa

### 3.4.14 Union of Bakeries

The Union of bakeries represents all bakeries (around 240). However, it is not clear which of these registered bakeries are still operating and what their production is. Bakeries will be monitored by a TPMA during the Project lifetime.

### 3.4.15 The federation of the Chambers of Commerce Industry and Agriculture (CCIA)

The CCIA are institutions of public interest that aim at representing commercial, industrial and agricultural interests. The CCIA communicate on customs in force within the commercial, industrial and agricultural procedures. They are subject to the control of the MOET as stipulated in the legislation. All businesses including agriculture related are registered with CCIA

### 3.4.16 The Shipping Agencies

The shipping agencies are concerned with the Project as they are main players in the wheat import chain.

## 4- Environmental and Social Baseline

This nation-wide project is defined to procure wheat for the population all around Lebanon. This chapter presents the description of the baselines relevant to the Project. It is divided into Environmental and Socio-economic baselines. It is to be noted that the project boundaries are limited to the premises of the PoB and PoT, therefore, the milling and distribution will be outside of the project boundaries.

### 4.1 Environmental Baseline

#### 4.1.1 Agricultural Sector and wheat production

The total agricultural land area in Lebanon is estimated at 332,000 ha, of which 231,000 ha are cultivated (almost half of the area is irrigated), with an average rain-fed landholding size of 1.36 ha and irrigated holding size of 1.23 ha. Permanent crops cover 54% of the total cropland, followed by temporary crops at 44%, and protected agriculture (greenhouses) that accounts to 2% of the total cropland in Lebanon <sup>11</sup>.

Wheat is planted in November-December and is harvested in June. The total area cultivated with wheat is approximately 40,000 hectares. 85 percent of the cereal production of Lebanon is located in the Beqa'a, Baalbeck-Hermel and Akkar governorates (See Annex H). The average production is 3 tons per hectare<sup>12</sup>.

In 2019/2020, the farmers showed little interest in getting free wheat seeds from LARI to cultivate wheat and commit to sell their production to the GOL. The deteriorating economic situation and the inability of farmers to secure the other necessary inputs, in addition to the failure of the government to pay the farmers for their 2019 production contributed to the lack of farmers' interest to grow wheat and thus to further reduction of local wheat production<sup>13</sup>.

#### 4.1.2 Project Location

The proposed project will ensure the consistent availability of wheat needs in Lebanon in response to the economic impact of the Ukrainian conflict to maintain food security, particularly related to bread availability. The wheat will be imported from different countries, according to availability and price, and will be shipped and delivered at the PoB and PoT. The project beneficiaries are in the whole country. The project activities will have limited effects at the PoB and PoT.

The PoB is located at the northern part of Beirut city on the coast of the Mediterranean Sea. The port occupies about 2.5 km of coast with land area of an average width of 300 meters. The marine area of the port is confined with 2 main breakwaters that limit the wave activity inside the port basins, and, hence, limit the circulation between the basins and the open sea. The infrastructure in the PoB has been severely affected by the explosion that occurred in August 2020, including the infrastructure for offloading grains. The silos, with storage capacity of 120,000 tons of wheat, were destroyed along with the conveying machinery (2 cranes with 3 suction ducts, 1 mobile suction duct, conveyor belt and pneumatic conveyor) that was used to directly unload shipments from vessels at the berth to silos. Currently the unloading of wheat is carried out using mobile cranes and clamshell buckets, and usually directly loading trucks which transport the wheat to mills. The PoB area, and surroundings, is a highly

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<sup>11</sup> FAO (2020). Special Report – FAO Mission to Assess the Impact of the Financial Crisis on Agriculture in the Republic of Lebanon. <http://www.fao.org/3/cb1164en/cb1164en.pdf>

<sup>12</sup> Idem

<sup>13</sup> Idem

urbanized area. The land use in the direct surroundings of the PoB is mainly industrial with some residential areas a few hundred meters from the port fence.



Figure 1: General Location of PoB (Google Earth Satellite Image, June 2022)

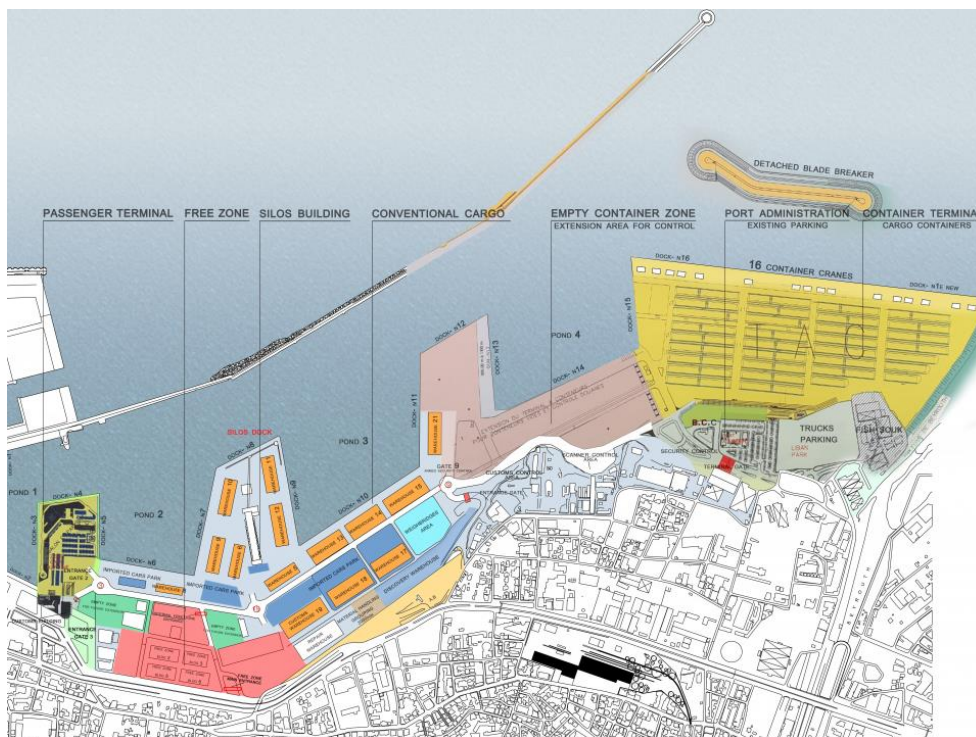


Figure 2: Map of PoB before August 4, 2020<sup>14</sup>

<sup>14</sup> <https://architecturez.net/file/port-map-jpg>



**Figure 3: Damaged Silos at PoB after August 4, 2020<sup>15</sup>**

The PoT is located at the northern part of Tripoli city, second largest city in Lebanon. The PoT has an approximate area of three million m<sup>2</sup>, with a water area of 2,200,000 m<sup>2</sup>, a land area of 320,000 m<sup>2</sup>, and a 420,000 m<sup>2</sup> dump area adjacent to the current port, reserved for the future Container Terminal and Free Market Zone (Tripoli Special Economic Zone (TSEZ)). PoT currently has one dock and 8 berths with depths varying from 8 to 10 meters. The PoT currently receives about 450 ships every year, it is currently undergoing expansion projects, where a new 600 m long berth is being built for container trade, with a rear zone area of 1,200,000 m<sup>2</sup>. This zone has been approved by the Lebanese Parliament as a free economic zone. The port has about 50 mobile cranes with different capacities, The PoB has a fishing port on its western border, and the direct surrounding land use is mainly industrial with a nearby residential area next to its eastern border. There is a dumpsite and a wastewater treatment plant located near the western border of the port.

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<sup>15</sup> <https://www.reuters.com/world/middle-east/lebanon-cabinet-approves-demolition-beirut-silos-damaged-port-blast-2022-04-14/>

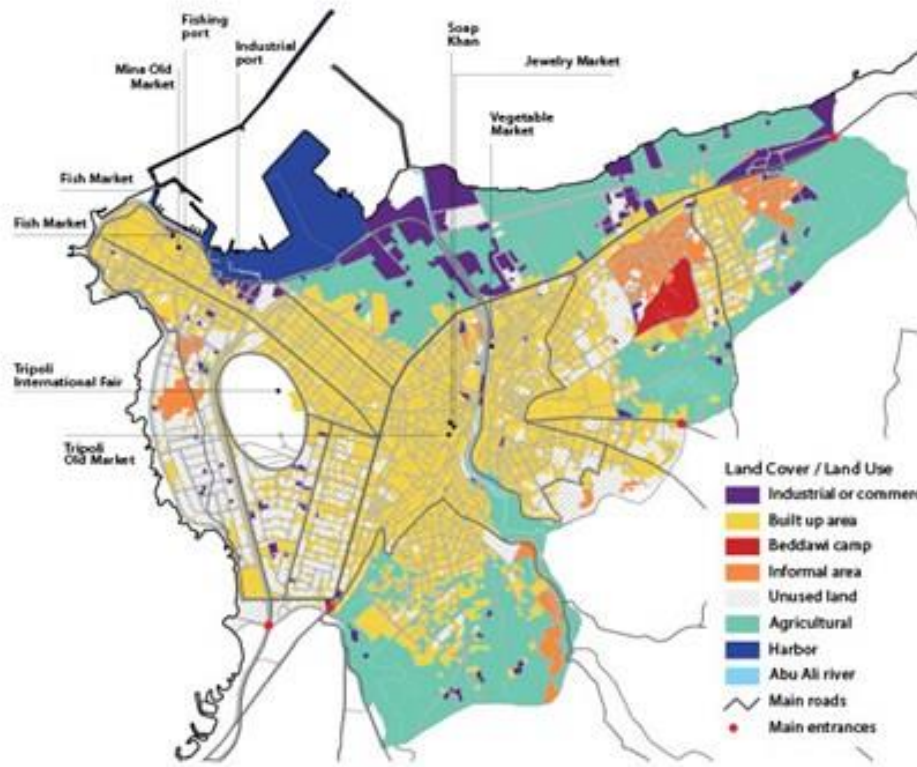


Figure 4: General Location of PoT<sup>16</sup>



<sup>16</sup> <https://www.tripolives.com/english/about-tripoli>

**Figure 5: Map of PoT<sup>17</sup>**

#### **4.1.3 Air Quality and noise**

As reported in the State of the Environment Report (SOER-2020), in Lebanon, the levels of gas pollutants, Particulate Matters (PMs) and their chemical contents, and Volatile Organic Compounds (VOCs) exceed the WHO recommended limits for yearly averages. Annual mean levels of O<sub>3</sub>, NO, NO<sub>2</sub> and SO<sub>2</sub> for the year 2005-2006 in a Beirut urban site were 31, 36, 40 and 11 µg/m<sup>3</sup>, respectively with no exceedance of the means recommended by WHO. O<sub>3</sub> and NO<sub>2</sub> showed similar concentrations in 2017 as reported by the MOE monitoring network. Monthly average concentrations as collected by the Air Quality Monitoring Network (AQMN), between June and December 2017 (the only continuous published record available) in urban and background locations across Lebanon, were between 12-123 µg/m<sup>3</sup> for O<sub>3</sub>, 9-79 µg/m<sup>3</sup> for NO<sub>2</sub>, 0-24 µg/m<sup>3</sup> for SO<sub>2</sub>, 7-50 µg/m<sup>3</sup> for PM<sub>2.5</sub> and 13-59 µg/m<sup>3</sup> for PM<sub>10</sub><sup>18</sup>. At PoB and PoT, the background noise levels at the ports are relatively high resulting from different activities at the port and its surroundings.

#### **4.1.4 Biological environment**

The PoB is a polluted area as the result of occurring activities, the proximity of wastewater outfalls and solid wastes landfill. The explosion has also impacted the environmental conditions in the port as some of the warehouses released the stored materials, and some vessels sank and caused release of some pollutants to the marine environment. The main surface water body near the port is perennial Beirut River, which is heavily polluted from sewage that is received from different sources in Beirut, the river estuary is near the eastern border of the port. There are no important or sensitive habitats located close to PoB.

The PoT is a heavily polluted area. At its northern limit, tons of solid wastes are landfilled. Tripoli Wastewater Treatment Plant also located at its northern limit, is not operational and all the collected wastewater is discharged into the sea. The nearest surface water body to the PoT is Abou Ali River, which is a perennial river that is highly polluted by sewage and solid waste received from different parts of Tripoli city and its upstream. Palm island, which is one of the protected areas of Lebanon with high ecological value as its sandy beach is classified as a nesting site for marine turtles and bird species, is located about 5.5 km northwest of the PoT.

#### **4.1.5 Fire Emergency Preparedness**

For firefighting, the PoB and the PoT rely on Fire Brigades (Civil Defense) that have center located at few hundreds of meters of the Port on the main highways.

#### **4.1.6 Grain Handling before August 4, 2020**

Wheat used to reach the PoB in bulk grain ships and was discharged in the iconic grain silo that was built in the 1970s. The height of the silo above the ground was 48 meters and it used to store 105,000 tons of grain. The Silo Terminal was managed by the MOET. It was considered as the masterpiece of the Swiss Company Buhler that implemented all the technological equipment and assembly. Before the explosion, the unloading of the grain used to be in full accordance with the GIIPs and the monitoring

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<sup>17</sup> [https://www.kas.de/documents/284382/284431/7\\_file\\_storage\\_file\\_26905\\_2.pdf/4e695098-9d18-ba51-aba2-3e65755c18e6?version=1.0&t=1539646850309](https://www.kas.de/documents/284382/284431/7_file_storage_file_26905_2.pdf/4e695098-9d18-ba51-aba2-3e65755c18e6?version=1.0&t=1539646850309)

<sup>18</sup> Available through <https://www.undp.org/lebanon/publications/lebanon-state-environment-and-future-outlook-turning-crises-opportunities#:~:text=September%2029%2C%202021&text=The%20report%20looks%20at%20nine,looking%20at%20the%20next%20decade.>

of the silos allowed controlling storage condition by getting an immediate visual overview, anywhere at any time. Proactive alarms helped to react in case of issues and to respond immediately.

About 85% of the cereals arriving in Lebanon used to pass by Beirut's Port silo. The other 15% are received directly by private companies and were unloaded directly to the trucks. Most of the wheat is imported from Eastern Europe, in particular from Russia. The grain used to be received directly from the vessel at quay and vacuumed into the Silo. The silo's suction speed was 600 mt per hour. Upon arrival, the grain was sampled and tested at the MoA's laboratory. Tests show humidity levels and potential infestation by insects or fungi. The grain was then stored in the silo's cells. The total storage capacity of PoB's Silo was 120,000mt of bulk grain. One cell would receive grains from one vessel only and is fumigated between 2 loads. Grain humidity and temperature were monitored regularly during storage within the cells. If these become too high, grain was transferred from one cell to another in order to be ventilated. When grain was to be distributed, it was loaded directly from the silo onto open-top trucks. 4 weighbridges allowed monitoring of the quantities loaded on trucks. The trucks were sanitized by a specialized company (refer to the photos below).



**Figure 6: Process of sanitization of trucks by a specialized company before the explosion at the PoB<sup>19</sup>**

#### **4.1.7 Current Wheat unloading process**

On August 4, 2020, a massive explosion took place at the Port of Beirut and all its infrastructure was destroyed. The different parties involved in the wheat supply chain had to improvise to keep it functional. The section below provides the main steps and processes that are currently followed in the unloading of the wheat vessels. It is based on a site visit conducted on June 16, 2022 to the PoB by MOET's E&S focal Point, during an unloading process and based consultations with relevant stakeholders during the site visit.

- **Sanitization of trucks**

<sup>19</sup> <https://www.yellowtech-lb.com/services.php?id=4#img>



The specialized company<sup>20</sup> is still responsible for sterilizing trucks used for the transport of grains from the PoB. However, the process of sterilization is now manual. The vehicle that is used to sterilize the trucks contains a diesel tank, a diesel generator, a water tank and a boiler all together as shown in the photos below. The hazard of fire is high, and it is recommended that MOET (entity that contracted the sanitization company) checks on the fire protection measures adopted by the said company. There is some firefighting equipment in the truck, but it should be checked for adequacy and expiry date. One worker would enter the truck and use a manual steam outlet to sterilize the trucks. Steam sterilization is used. It is nontoxic, rapidly microbicidal, sporicidal, and rapidly heats and penetrates fabrics. The steam sterilizer uses saturated steam at 121–132 °C. A typical standard for steam sterilization is achieved after 15 to 30 minutes under a pressure of 106 kPa (1 atm) once all surfaces have reached a temperature of 121 °C. Steam sterilization occurs from high temperature/pressure and chemical equipment ensuring hygiene safe working environment: There is no evidence of control nor monitoring from the MOET. The efficiency of the process relies on the qualifications and experience of the operator performing the task. The same operator then goes to the cabinet of the truck where a computer and a printer are installed to print out 3 copies of the sanitization certificate. The filing is also taking place in the cabinet of the truck (see photos below) and there are no entities that monitor the issuance of sanitization certificates.

The trucks transporting grains from the PoB are not necessarily dedicated for food only, they can carry any type of cargo such as cattle, scrap or chemical fertilizers. It is up to the worker to decide if the tank is rusty then he refuses to sterilize it. The sanitizing worker does not wear proper PPE. There is a risk to his health and safety as he is sanitizing the trucks using a very high temperature steam.



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<sup>20</sup> [Yellow tech](#)

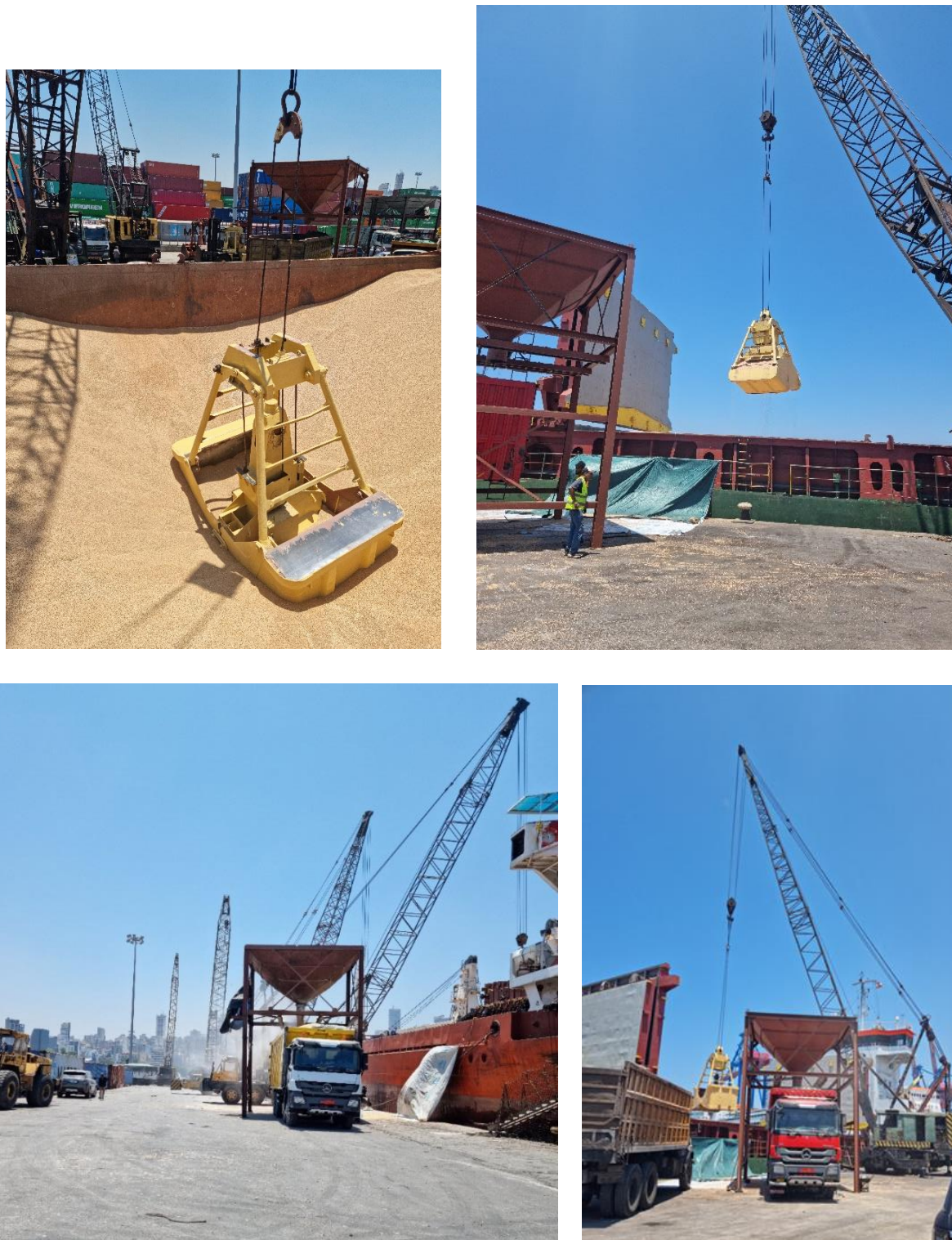


Figure 7: Vehicle and equipment currently used for the sanitization of trucks and sample sanitization certificate <sup>21</sup>

- **Wheat unloading**

The wheat is unloaded from the ship using mobile cranes and clamshell buckets. The clamshell buckets then travel from the ship to a funnel where wheat is discharged into the sanitized trucks (see photos below)

<sup>21</sup> Photos taken during MOET site visit to the PoB on June 16, 2022



**Figure 8: Process of wheat unloading** <sup>22</sup>

During the travel of the clamshell buckets and more importantly during the discharge of the wheat in the funnel, there is massive dust generation and lots of grains wastage. Grains and hay spread over a large area of the port. As per the unloading contractors, the wheat is left on the ground to be eaten by

<sup>22</sup> Photos taken during MOET site visit to the PoB on June 16, 2022

the birds, but it may be reloaded to the trucks probably after getting contaminated by oils, dusts and any type of solid and liquid wastes. Upon arrival, the grain is sampled from the bottom, middle and top of the cargo and tested at the MOA's laboratory to analyze physical properties, impurities, fungi and toxins. The discharge does not await the results of the tests (which takes around 15 days on average) but the millers are not allowed to dispose of the wheat unless they receive a clearance from the MOA. There are current discussions with MOA to speed up the inspection/result period and to request that results of tests on wheat conducted in the source countries be added to the required documentation.

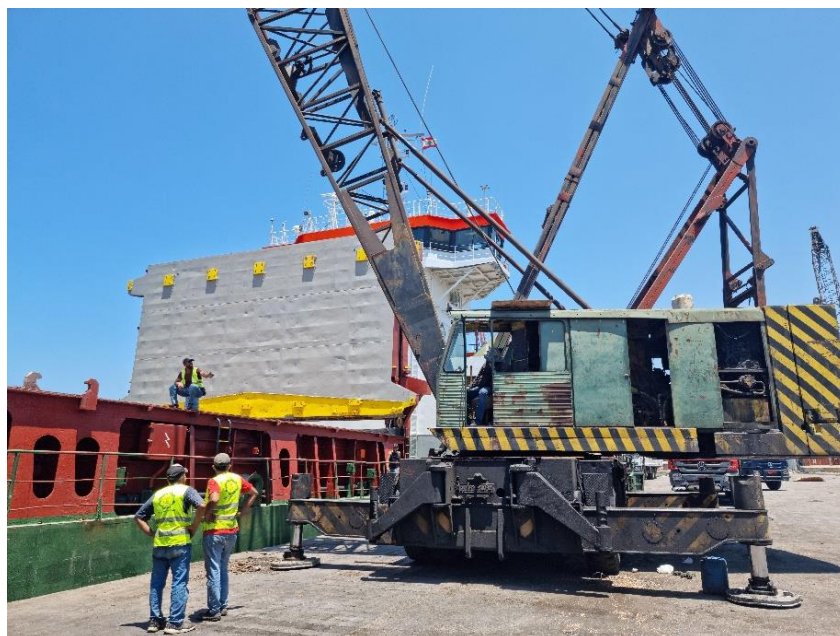
During the process of unloading, lots of dust is observed and an important quantity of wheat is wasted on the ground as shown in the following photos. The use of a flexible pipe to extend the funnel could reduce considerably this wastage.



**Figure 9: Wasted wheat around the unloading location<sup>23</sup>**

<sup>23</sup> Photos taken during MOET site visit to the PoB on June 16, 2022

Most of the machinery used during the unloading is rusted and in bad condition and oil spills may occur (see figure below). The main two unloading contractors at the PoB lost all their machinery and struggled rehabilitating their older ones to pursue their work.



**Figure 10: Old machinery used for the wheat downloading and workers standing without PPEs below the mobile cranes and clamshell buckets<sup>24</sup>**

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<sup>24</sup> Photos taken during MOET site visit to the PoB on June 16, 2022



Figure 11: Operators sitting at heights are unprotected from falls and do not wear any kind of PPE 25.

- **Transport of Wheat to millers**

All trucks are covered before leaving the Port. This process is checked by the Port Authorities.



Figure 12: Workers covering the truck cargo box before leaving the PoB <sup>26</sup>

- **Observations noted during the site visit conducted by MOET E&S focal point on June 16, 2022 while unloading process was taking place:**

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25 Photos taken during MOET site visit to the PoB on June 16, 2022

26 Photos taken during MOET site visit to the PoB on June 16, 2022

- a- All the steps and the workers involved (the shipping agent, the clearing agents, the stevedore - or provider of laborers-, the equipment contractor, the truck contractor) are required to acquire insurances as per the regulations.
- b- The total number of workers on the site during the unloading process is as follows:
  - a. 1-2 workers sanitizing the trucks
  - b. 7-11 working on unloading the wheat
  - c. 1 truck driver. A maximum of 75 trucks can be filled by day. Only one truck is filled at a time.
- c- There is no firefighting equipment at the ports, but fire brigades (Civil Defense) are at a few hundred meters distance from unloading area.
- d- All workers are above the age of 18 as stated by the interviewees during site visit and observed on site.
- e- MOPH inspects the ship and all the ship workers' health certificates
- f- The National Council for Scientific Research (CNRS) inspects boats and cargo for the level of radiation
- g- OHS measures are almost inexistent for workers in the unloading process.
- h- In case of accidents, the Red Cross and the civil defense are directly contacted. They have offices at port (PoB) and few hundred meters distance from the Port (PoT),

## 4.2 Socio-economic Baseline

### 4.2.1 Demographic Profile and socio-economic environment

Lebanon, a small country of 6 million people, hosts the highest per capita concentration of refugees in the world. The latest estimates by the GOL show that the country hosts 1.5 million displaced Syrians, along with 31,502 Palestinian refugees from Syria, and a preexisting population of more than 277,985 Palestinian refugees<sup>27</sup>. The economic crisis has had dire consequences on poverty levels in Lebanon, which was already expanding before the crisis, from an estimated 26 percent in 2012 to 37 percent in 2019. Tentative projections by the World Bank suggest that well over 50 percent of the population is likely to fall under the national poverty line in 2020<sup>28</sup>. More recently, the conflict in Ukraine has impacted the food security situation in Lebanon and has reached alarming levels. It is estimated that 34 percent of Lebanese people and 50 percent of refugees were food insecure in 2021. Bread is the single largest item in the Survival and Minimum Expenditure Basket (SMEB) in Lebanon, as calculated by the WFP in 2020<sup>29</sup>. Around 88 percent of Syrian refugee households fall below the SMEB. Poor, vulnerable households and refugees are the most impacted by any disruption of the wheat value-chain. Due to the deteriorating economic and financial situation, socio-economically vulnerable groups will face more and more difficulties meeting their basic needs, including food,

### 4.2.2 Multidimensional Poverty Index

The Lebanon Multidimensional Poverty Index (MPI) was developed by the Central Administration of Statistics (CAS) and the WB and published in 2022<sup>30</sup>. It is based on the notion that poverty is not simply about a person or household having low income but encompasses a broader set of factors such as lack of clean water or electricity, poor quality of work or limited schooling. Multidimensional poverty measures help to provide a more comprehensive portrayal of the poor in a country. The index is derived from 19 indicators across five dimensions which are education, health, financial security/well-being, basic infrastructure and living standards. The 2019 MPI for Lebanon reveals that 53.1 percent of

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<sup>27</sup> Lebanon Crisis Response Plan, 2017-2020 <https://lebanon.un.org/en/172232-2022-lebanon-crisis-response-plan-lcrp>

<sup>28</sup> <https://www.worldbank.org/en/news/factsheet/2020/04/21/targeting-poor-households-in-lebanon>

<sup>29</sup> <https://docs.wfp.org/>

<sup>30</sup> <http://www.cas.gov.lb/index.php/demographic-and-social-en/poverty-en>

residents in Lebanon were multi-dimensionally poor. The extreme poor, where residents are deprived in more than 50 percent of the indicators, amount to 16.2 percent of the population, with an average intensity of 59.3 percent and an MPI of 0.096.

Across the eight governorates, Akkar and Bekaa are the poorest while the greatest intensity of poverty among the MPI-poor, is experienced in Beirut. In other words, while one is less likely to be MPI-poor in Beirut, those that are poor are more likely to experience greater deprivation than in other governorates. The MPI-poor are not distributed in the same manner as the population of Lebanon. Approximately, a third of Lebanon's MPI-poor live in Mount Lebanon where about 41 percent of the population reside. At the district level, Minieh-Danniyeh and Hermel have the highest incidence of MPI-poverty, whereas Keserwan and Batroun have the lowest incidence. The poorest districts tend to be associated with lower net enrolment rates at secondary level and a lower share of students attending private education, higher illiteracy rates, lower reported income levels and a higher share of self-reported poor/very poor, and larger informality rates. However, the poorest districts do not always host the largest shares of the MPI poor - Baabda and Akkar have the largest share of multi-dimensionally poor (10.7 and 9 percent respectively) and Bcharre has the lowest share (0.4 percent). Across age-groups, the highest incidence of multidimensional poverty occurs among 66.8 percent of children, ages 0-4 years. This is a common finding in other countries, highlighting the vulnerability of households with young children. Particular to Lebanon, the absence of health insurance contributes the largest to MPI-poverty across the age groups followed by low school attainment. Female-headed households tend to have higher incidences of multidimensional poverty (56.7 percent) relative to male-headed households (52.6 percent). Approximately, 11.6 percent of individuals live in female-headed households while the rest (88.4 percent) reside in male-headed households. Households whose head have higher level of educational attainment are associated with lower rates of multidimensional poverty. For instance, less than 22 percent of households are MPI-poor among heads with tertiary education compared to 78.4 for those with no schooling. Larger households are found to have higher levels of poverty, consistent with MPI findings in other countries.<sup>31</sup>

#### **4.2.3 Sexual Harassment, Sexual Exploitation and Abuse**

Following the multiple crises that Lebanon has been facing for the past few years, the amount of violence against children and women has significantly increased. With increased socioeconomic needs and vulnerabilities in addition to preexisting societal norms and differences attributed to males and females, women have become more susceptible to domestic violence, sexual harassment, sexual exploitation and abuse with increased barriers to access services and opportunities. During COVID 19, stress, the disruption of social and protective networks, loss of income and decreased access to services all can exacerbate the risk of violence for women. In the first quarter of 2020, Lebanon indicated a 4% increase of intimate partner violence compared to the same time period in 2019<sup>32</sup>

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<sup>31</sup> CAS and the World Bank (2022), Lebanon Multidimensional Poverty Index 2019 available on <http://www.cas.gov.lb/images/PDFs/Poverty/Lebanon%20MPI%202019%20Report%20%20EN.pdf>

<sup>32</sup> <https://reliefweb.int/report/lebanon/impact-covid-19-sgbv-situation-lebanon-inter-agency-sgbv-task-force-lebanon-may-2020>



## 5- Potential Environmental and Social Risks and Mitigation

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The project is limited to procurement of wheat to maintain the supply during the crises caused by the war in Ukraine and to enable emergency access to affordable bread by poor and vulnerable households. The project finance will not involve any civil works nor any other activities after the vessels deliver the shipment at the PoB and/or PoT. There are some associated activities, which are not directly financed by the project but are directly and significantly related to the project; that will be carried out contemporaneously with the project; and are necessary for the project to be viable and that would not have been conducted if the project did not exist. Those activities include (i) offloading the wheat from the vessels to either trucks or temporary storage at the port, and (ii) trucks moving to the port to be loaded from vessels and transporting the wheat to mills including any transit fumigation needed. Other downstream activities (i.e., storage at the mills and related pest control, milling, distributing flour, baking and distributing bread and other baked products) are not considered associated with the project because they will follow exactly the existing arrangements and processes which existed before the project and will remain after the project closure.

The environmental risk rating of the project is moderate, and the social risk rating is substantial. The following section outlines the environmental and social risks associated with the Lebanon Wheat Emergency Response Project and recommends the respective mitigation measures that might be required to avoid negative impacts.

### 5.1 Potential Positive Impacts of the Project

The following positive impacts are expected by the Project:

1. Improvement of the access to affordable bread for vulnerable individuals living in Lebanon and particularly underserved poor
2. Reduction of social tension and rebuilding trust in the Government
3. Engaging with stakeholders including vulnerable groups and seeking their feedback for successful implementation of the project
4. Strengthening MOET's oversight function as well as capacity to manage the gradual transition from the current wheat subsidy system to a more market-oriented system.

### 5.2 Environmental risks and impacts and mitigation measures

Environmental risks and potential impacts arising from the Lebanon Wheat Emergency Response Project are presented below:

#### 5.2.1 Dust emissions

During offloading the grains, while moving the wheat by the clamshell buckets from vessels, organic dust may be generated and could harm the workers and to a lesser extent the air quality.

#### Mitigation measures

- Suppressing the dust by spraying water is not an option as this would damage the grains, therefore, the measures to minimize exposure risks to such limited dust emissions including making sure that workers are not exposed to dust in the area of high emissions and that any worker need to be at that area should use appropriate Personal Protective Equipment (PPE).

- Incorporate the Checklist E&S requirements in the framework agreement between MOET and local importers and cause local importers to ensure that those measures are implemented by offloading contractors.

### ***5.2.2 Food Safety and Storage Management***

There are some risks related to food safety in case the imported wheat contains some fungi or related toxins, or some remains from the fumigation activities during the upstream loading at sources and in transit. There are biological factors responsible for storage losses such as moisture content, insects, pests, microorganisms, and rodents. Before storing wheat grain, it must be dried to a proper level of moisture content; otherwise, many problems such as germination and loss of eating quality may occur. Fluctuations in environmental factors, such as temperature, dampness, and longevity result in significant nutrient losses. Extreme dry environmental conditions during storage result in faster seed aging, reducing longevity and quality. However, most of the importers will perform all the necessary tests before purchasing the wheat to prevent financial losses because if the results of the tests performed by the MOA are not within the acceptable standards, the wheat will not be distributed to the mills. The main risk on food safety issue is the current food unloading process is related to the following procedures:

- As detailed in the baseline section, the food trucks used for the transportation of wheat are not dedicated for cereals only. The cleaning of the trucks is not monitored by any entity. In addition, the trucks may be rusty, and their disinfection is not monitored by any entity neither. Consequently, wheat may be contaminated during trucks uploading, however, this risk is considered moderate as the wheat is sieved at the mills and cleaned from all kinds of impurities before milling, and the milling process separates the outside bran, which may be contaminated, from the inside flour.
- There is no evidence of disposal of the wheat that falls on the floor during unloading. The wheat collected from the floor can be heavily contaminated by dirt, oils from machinery, solid and liquid waste. If remixed to the clean wheat in the truck cargo the wheat may get some contaminants from the floor, however, considering that the wheat is subject to sieving and cleaning processes at the mills, as indicated above, the risk is considered moderate.

### **Mitigation measures**

- The risk of contaminated food can be mitigated by ensuring that produced flour is properly analyzed and is meeting the food safety standards. Industrial Research Institute (IRI) is currently monitoring the quality of the flour and taking samples and analyzing them on a bi-monthly basis for four chemical and physical quality. This is a routine procedure that IRI is conducting on the 12 millers. This monitoring process will continue during the project duration.
- The truck and its cargo box should be clean. Records of the clean-down operation at a nearby station should be kept. There should be no visible contaminants or material adhering to the truck. If washing is used, water should be potable without any additives. The clean-down should be outside the port area. trucks entering the port must be clean.
- The truck cargo box should not be rusty
- The truck should be sanitized. Sanitation using hot pressurized vapor is acceptable. The truck should be dried prior to commencement of loading.
- Sanitization must be carried out:
  - By qualified and trained personnel;
  - By Personnel wearing adequate PPEs and taking necessary safety precautions
  - In a suitable area;
  - In compliance with Good Industrial Practices, laws, regulations and policies
- There should be an office dedicated to the management of sanitization that issues certificates of sanitization mentioning the date and time of completion of the Process. It is recommended to improve the documentation and filing of the sanitization process will allow tracking in case

of contamination. The project E&S focal point or the E&S consultant will also verify the sanitization process of the trucks.

- It is recommended that the funnels be equipped with conveyor (or flexible pipe) to minimize the wastage of wheat and contaminated wheat collected from the floor should not be reloaded into the truck transporting wheat and destined to the millers
- Refrain from storing the wheat in extreme conditions.
- Inspect by visual observations the wheat during storage and report incidences of rodents, birds, mites. If suspected test the grains for microbes and toxins. representative analysis is taken to ensure the grains are free from any fungus diseases or toxins.

### ***5.2.3 Emergency Situations and Fire***

The sanitization truck carries a diesel tank. Therefore, there is a risk of fire that may endanger the workers' lives, especially if the truck is not well equipped with firefighting equipment and if proper fire prevention measures are not taken.

#### **Mitigation measures**

- Equip the sanitizing trucks with firefighting equipment and forbid smoking in the area dedicated to sanitization.
- Sanitizing trucks should abide to PoB and PoT emergency preparedness and response plans
- Truck drivers and helpers shall have basic knowledge/training in fire control.

### ***5.2.4 Potential Truck/Car accident during transportation***

There are some risks of road safety issues related to the movement of the trucks to the ports and the transport of the wheat from the ports to the mills. The inappropriate utilization of safety measures by road users plays a vital role in increasing road injury morbidity and mortality. Moreover, distracting behaviors (eg, cell phone use) often act as a catalyst that escalates the risk of being involved in road collisions. Road accidents can also be due to a lack of vehicle maintenance.

#### **Mitigation measures**

- Conduct an awareness raising campaign for the truck drivers to respect the speed limits and reduce in-car distractions such as cell phones, eating or momentarily taking a hand off the wheel. This awareness raising session can be organized by specialized NGOs (such as [YASA](#) or [Kunhadi](#)) at the demand of the trucks' contractor.
- Require the trucks' contractor to perform engine maintenance regularly.
- Report truck car accidents to the MOET

### ***5.2.5 Occupational Health and Safety Risks***

The unloading of the wheat from the vessels will be associated with limited OHS risks to the port workers caused by the moving objects. There are also OHS risks related to sanitization of the trucks to preserve the wheat while in transit and some risks related to working on heights as observed in the field visit.

### Mitigation measures

- Contractors to prepare Contractor OHS Plan (C-OHSP) that includes systemic risk management plan comprising risk identification, prevention, and mitigation. The plan needs continuous evaluation and improvement measures in addition to response procedures in case of incidents.
- There should be clear instructions to clear areas of moving objects and dusty areas, certain precautions for working at heights, performing hot works and working in confined spaces according to the C-OHSP
- Provide adequate and required PPEs to workers and enforce on their use according to the C-OHSP.
- Port operation activities should be conducted in accordance with applicable international regulations and standards, including [ILO Code of Practice for Safety and Health in Ports \(2016\)](#) and [General Conference of the International ILO Convention concerning Occupational Safety and Health in Dock Work, C-152, \(1979\)](#);

### 5.3 Social Risks and impacts and mitigation measures

Social risks and impacts from operational activities of the Lebanon Wheat Emergency Response Project are presented below:

#### 5.3.1 Labor risks issues

Given the nature of the Project intervention, the key labor risks which may be associated with the project are limited and they include risks on Project workers related to labor and working conditions that are not compliant with either the Lebanese Labor Law or ESS2. For example, wages that are not proportionate with tasks performed or industry standards, irregular payment of salaries or non-payment, disparity in wages and/or denial of benefits (compensation, bonus, maternity benefits, etc.), discrimination towards women and workers with disabilities or other vulnerabilities, unlawful termination, withholding of benefit, including abrupt termination of employment, and Potential SEA/SH risks and GBV among the Project workers. The risks include also lack of understanding and implementation of OHS requirements for the workers including the special requirements in the context of COVID-19 outbreak that may lead to transmission of diseases and infections to the workers and potential child labor and forced labor engaged by primary suppliers which are trading companies.

#### Mitigation Measures

- Design, implement and maintain an efficient GM to handle complaints and concerns for all the Project Workers including referral pathways for SEA/SH (refer to relevant section in the [LMP in section 9](#))
- Signing Codes of Conducts by all the workers on the project in a culturally appropriate language
- Training and raising awareness of all the workers on the Project on SEA/SH and GBV.
- Develop and implement LMP (Refer to section 9 in this ESMP) in compliance with the Lebanese Labor Law and ESS2
- Prepare Contractor OHS Plan (C-OHSP) that includes COVID-19 prevention measures.
- Incorporate the Checklist E&S requirements in the framework agreement between MOET and local importers and cause local importers to ensure that those measures are implemented by offloading contractors.
- Maintain the existing employment arrangement of the government staff and ensure that relevant aspects of ESS2 apply including through, inter alia, a) implementing adequate occupational health and safety measures and b) setting up GM for the workers.; c) carefully select the primary suppliers and ensure no child labor and forced labor are engaged; d) implement the requirements in the C-OHSP.

- To mitigate the risk of child and forced labor engaged by primary suppliers, the framework agreements that will be signed between MOET and the importers will include a declaration that they will not use child labor or forced labor

### ***5.3.2 Lack of consideration for vulnerable groups***

The project may have a lack of considerations for differentiated treatment for vulnerable groups such as elderly, people pre-existing conditions, the very young and people with disabilities that may not be capable of accessing bread. This may be partly due to smuggling of subsidized wheat which may hinder the access for the most vulnerable populations to affordable bread.

### **Mitigation Measures**

- The selected TPMA shall follow up closely on the categories of people receiving bread based on WFP and Social Safety Net Project (SSNP) database for vulnerable groups
- MOET to follow up on the grievances in a timely manner as outlined in the SEP and section 8 of this ESMP and take proper measures including reporting in the case of grievances related to elite capture.
- Update and implement the Stakeholder Engagement Plan (SEP) that was prepared within the framework of this Project and disclosed on the MOET website ([link](#)).
- Engaging in inclusive consultations with all identified stakeholders including vulnerable groups like refugees as outlined in the SEP and document and widely disseminate the project GM.
- To mitigate the risk of smuggling of subsidized wheat, the framework agreements shall include a provision with the obligation to deliver wheat in Lebanon. To ensure access to affordable bread for the most vulnerable populations the framework agreements shall include provisions for delivery of wheat to bakeries in areas with high levels of poverty, refugees and their host communities. The project will include TPMA arrangements which will confirm that the bakeries services areas that include poor and vulnerable groups are receiving the flour as per the framework agreement. In addition, the project will finance high frequency ‘Listening to Poor and Vulnerable Household Surveys’, entailing data collection on bread prices and consumption for the poor and vulnerable households, by conducting random sampling and surveying (biweekly) using UNHCR and WFP beneficiary lists. This information will be triangulated at MOET level with information consolidated from the consumer protection agency, GM, and WFP price monitoring system, and used to adopt appropriate remedies, such as including in the framework agreement a preferential distribution clause for bakeries located in areas where most of the poor and vulnerable groups are located.
- To ensure access to affordable bread for the most vulnerable populations the framework agreements will include provisions for delivery of wheat to bakeries in areas with high levels of poverty, refugees and their host communities.

### ***5.3.3 Risks associated with the transition from the current wheat subsidy system to a more market-oriented system***

Additional social risks are associated with MOET’s planned transition from the current wheat subsidy system to a more market-oriented system which will be undertaken as part of the consultancy services and technical assistance under component 2. This may potentially impact the most vulnerable populations in Lebanon as a result of impacts to bread prices.

### **Mitigation measures**

Mitigations measures include:

- policies that ensure the social protection of the most vulnerable, possibly through an expansion of the current social safety net program (ESSN). a clear communication campaign targeting the most vulnerable and poor populations,
- An effective and widespread dissemination of the GM.
- Consultation sessions as outlined in the SEP and as needed particularly targeting vulnerable and poor populations and documenting.

#### ***5.3.4 Gender-based violence (GBV) and sexual harassment, exploitation and abuse (SEA)***

Gender inequalities and norms can play an important role for access to bread. Moreover, pandemics can create or exacerbate the conditions that especially put women and girls at greater risk of SEA/H. For instance, women and girls may be forced into exchanging sexual favors for access to food or even bread.

### **Mitigation measures**

- Ensure the people have access to the GM which should be strengthened with referral pathways in the event of SEA/SH complaints
- Train staff handling the GM on how to handle GBV related complaints
- All workers should sign the code of conduct to hold them accountable as detailed in the [LMP](#).
- Publicly post or otherwise disseminate messages clearly prohibiting SEA/SH during the provision of wheat and bread.
- Prepare Contractor OHS Plan (C-OHSP) that includes requirements for GBV/SEAH Prevention.

#### ***5.3.5 Potential child labor and forced labor engaged by primary suppliers which are trading companies***

Wheat importers may engage child or forced labor in their activities

- **Mitigation measures**

To mitigate the risk of child and forced labor engaged by primary suppliers, the framework agreements that will be signed between MOET and the importers will include a declaration that they will not use child labor or forced labor

## 5.4 Summary of environmental and social risks and impacts and relevant mitigation measures

The following tables summarize the rating and the proposed mitigations measures of the risks and impacts of the Project.

**Table 3: Summary Risks and Impacts Rating of Lebanon Wheat Emergency Response Project**

Media	Potential Impact	Nature	Duration	Reversibility	Probability	Severity	Impact weight
<b>Environmental Impacts</b>							
Dust Emissions	During offloading the grains, while moving the wheat by the clamshell buckets from vessels, organic dust may be generated and could harm the workers and to a lesser extent the air quality.	Direct	Short term	Reversible	H	L	M
Food Safety and Storage Management	There are some risks related to food safety in case the imported wheat contains some fungi or related toxins, or some remains from the fumigation activities during the upstream loading at sources and in transit. Wheat may also be contaminated during trucks uploading.	Direct	Short term to medium term	Reversible	M	L to M	M
Emergency Situations and Fire	The sanitization truck carries a diesel tank. Therefore, there is a risk of fire that may endanger the workers' lives, especially if the truck is not well equipped with firefighting equipment and if proper fire prevention measures are not taken.	Indirect	Short to medium term	Reversible/ Irreversible	M	M	M

Media	Potential Impact	Nature	Duration	Reversibility	Probability	Severity	Impact weight
Potential Truck/Car accident during transportation	There are some risks of road safety issues related to the movement of the trucks to the ports and the transport of the wheat from the ports to the mills..	Direct	Medium term	Reversible/ Irreversible	L	S	M
Occupational Health and Safety Risks	The unloading of the wheat from the vessels will be associated with limited OHS risks to the port workers caused by the moving objects. There are also OHS risks related to sanitization of the trucks to preserve the wheat while in transit and some risks related to working on heights as observed in the field visit	Direct	Long term	Reversible/ irreversible	L	S	M
<b>Socio-economic impacts</b>							
Labor risks issues	Risks on Project workers are related to labor and working conditions that are not compliant with either the Lebanese Labor Law or ESS2. The risks include also lack of understanding and implementation of OHS requirements for the workers including the special requirements in the context of COVID-19 outbreak and potential child labor and forced labor engaged by primary suppliers which are trading companies.	Direct	Medium term	Reversible	M	S	S
Lack of consideration	Vulnerable groups may not be capable of accessing affordable bread. This may be partly	Direct	Short term	Reversible	M	M	M



Media	Potential Impact	Nature	Duration	Reversibility	Probability	Severity	Impact weight
for vulnerable groups	due to smuggling of subsidized wheat.						
Risks associated with the transition from the current wheat subsidy system to a more market-oriented system	The transition to a market-oriented system may potentially impact the most vulnerable populations in Lebanon as a result of impacts to bread prices	Direct	Long term	Reversible	M	S	S
Gender-based violence (GBV) and sexual harassment, exploitation and abuse (SEA)	Gender inequalities and norms can play an important role for access to bread. Moreover, pandemics can create or exacerbate the conditions that especially put women and girls at greater risk of SEA/H. For instance, women and girls may be forced into exchanging sexual favors for access to food or even bread.	Indirect	Short term	Reversible	L to M	M	M
Potential child labor and forced labor engaged by primary suppliers which are trading companies	Wheat importers may engage child or forced labor in their activities	Direct	Medium term	Reversible	L	M	M

Risks are rated as: high (H), substantial (S), moderate (M) and low (L)

Table 4: Summary of environmental and social risks and impacts and relevant mitigation measures

Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsibilities	Timeline	Cost (\$US)
<b>Environmental Risks and Impacts</b>				
<p><b><i>Dust emissions</i></b></p> <p>During offloading the grains, organic dust may be generated and could harm the workers and to a lesser extent the air quality.</p>	<ul style="list-style-type: none"> <li>• Prepare Contractor Occupational Health and Safety Plan (C-OHSP) that includes requirements for dust control and health and safety.</li> <li>• Incorporate the <u>Checklist E&amp;S</u> requirements in the framework agreement between MOET and local importers and cause local importers to ensure that those measures are implemented by offloading contractors.</li> <li>• Using appropriate PPE to minimize exposure risks to such limited dust emissions including.</li> </ul>	<p>MOET</p> <p>Unloading contractor</p> <p>The sanitization contractors,</p>	<p>Throughout the project</p>	<p>No additional costs; the cost is imbedded in mandatory EHS measures and in Contract</p>
<p><b><i>Food Safety and Storage Management</i></b></p> <p>There are some risks related to food safety in case the imported wheat contains some fungi or related toxins, or some remains from the fumigation activities during the upstream loading at sources and in transit.</p>	<ul style="list-style-type: none"> <li>• Ensuring that the product is properly analyzed and meets the food safety standards.</li> <li>• MoET and LARI to conduct Laboratory analyses on regular basis to detect infestation</li> <li>• Refraining from storing wheat in extreme conditions.</li> </ul>	<p>MOET and MOA</p>	<p>Throughout the project</p>	<p>No additional costs. the measures are within the mandate of the public institutions</p>

Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsibilities	Timeline	Cost (\$US)
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The food trucks used for the transportation of wheat are not dedicated for cereals only and the trucks may be rusty, and their disinfection is not monitored. Consequently, wheat may be contaminated during trucks unloading and that could cause a moderate risk to food safety.

There is no evidence of disposal of the wheat that falls on the floor during unloading. The wheat collected from the floor can be heavily contaminated by dirt, oils from machinery, solid and liquid waste. There is a risk that the collected wheat is refilled in the trucks and mixed to the clean wheat. The resulting risk on food safety is moderate as further cleaning and sieving processes take place at the mills.

- Inspecting by visual observations the wheat during storage and report incidences of rodents, birds, mites (This is part of MOA routine inspection)
- The truck and its cargo box should be clean. Records of the clean-down operation at a nearby station should be kept. There should be no visible contaminants or material adhering to the truck. If washing is used, water should be potable without any additives. The clean-down should be outside the port area. Trucks entering the port must be clean.
- The truck should be sanitized and dried prior to commencement of loading.
- Sanitization must be carried out:
  - By qualified and trained personnel;
  - By Personnel wearing adequate PPEs and taking proper safety precautions
  - In a suitable area;
  - In compliance with Good Industrial Practices, laws, regulations and policies
- There should be an office dedicated to the management of the sanitization that issues certificates of sanitization mentioning the date and time of completion of the Process.

Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsibilities	Timeline	Cost (\$US)
	<ul style="list-style-type: none"> <li>The funnels are recommended to be equipped with conveyor (or flexible pipe) to minimize the wastage of wheat and contaminated wheat collected from the floor should not be reloaded into the truck transporting wheat and destined to the millers</li> </ul>			
<p><b><i>Emergency Situations and Fire</i></b></p> <p>There are some fire risks associated with the diesel tank inside the sanitization truck</p>	<ul style="list-style-type: none"> <li>Ensuring proper fire prevention measures in the sanitization truck.</li> <li>Trucks to abide by PoB and PoT s emergency preparedness and response plans</li> <li>Truck staff shall have basic knowledge/training in fire control.</li> </ul>	<p>MOET</p> <p>PoB</p> <p>PoT</p>	Throughout the project	No additional costs; the cost is imbedded in mandatory EHS measures and in Contract
<p><b><i>Potential Truck/Car accident during transportation</i></b></p> <p>There are some risks of road safety issues related to transporting the wheat from the ports to the mills.</p>	<ul style="list-style-type: none"> <li>Conduct an awareness raising campaign for the truck drivers to respect the speed limits and reduce in-car distractions such as cell phones, eating or momentarily taking a hand off the wheel.</li> <li>Require the trucks' contractor to perform engine maintenance regularly.</li> <li>Report truck/car accident to the MOET</li> </ul>	<p>MOET</p> <p>The transportation contractors, contracted by private mills</p>	Throughout the project	No additional costs; the cost is imbedded in mandatory EHS measures and in Contract

Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsibilities	Timeline	Cost (\$US)
<b>Social Risks and Impacts</b>				
<p><b><i>Labor risks issues</i></b></p> <p>Risks on Project workers related to labor and working conditions that are not compliant with either the Lebanese Labor Law or ESS2. For example:</p> <ul style="list-style-type: none"> <li>• Wages that are not proportionate with tasks performed or industry standards,</li> <li>• Irregular payment of salaries or non-payment,</li> <li>• Disparity in wages and/or denial of benefits (compensation, bonus, maternity benefits, etc.),</li> <li>• Discrimination towards women and workers with disabilities or other vulnerabilities,</li> <li>• Unlawful termination,</li> <li>• Withholding of benefit, including abrupt termination of employment,</li> <li>• Potential SEA/SH risks and GBV among the Project workers.</li> <li>• Lack of understanding and implementation of OHS requirements for the workers including the special requirements in the context of COVID-19 outbreak</li> </ul>	<ul style="list-style-type: none"> <li>• Designing, implementing and maintaining an efficient GM to handle complaints and concerns for all the Project workers including referral pathways for SEA/SH (refer to relevant section in the LMP)</li> <li>• Signing Codes of Conducts by all the workers on the project in the culturally appropriate language</li> <li>• Training and awareness raising of all the workers on the Project on SEA/SH and GBV.</li> <li>• Developing and implementing LMP – Refer to section 9 in this ESMP) in compliance with the Lebanese Labor Law and ESS2 on wages and benefits, on leaves and rest per week, on employment of women and other. Written employment contract.</li> <li>• Prepare Contractor C-OHSP that includes requirements for (i) dust control, (ii) health and safety risks (iii) COVID19 prevention measures, and (iv) GBV/SEAH Prevention.</li> <li>• Incorporate the <u>Checklist E&amp;S</u> requirements in the framework agreement between MOET and local importers, and cause local importers to ensure that those measures are implemented by offloading contractors.</li> <li>• Carefully select the importers and ensure no child labor and forced labor are engaged;</li> </ul>	<p>MOET</p> <p>Unloading contractor</p> <p>The transportation contractors, contracted by private mills</p>	<p>Throughout the project</p>	<p>Cost of training (Refer to <u>Section 6</u>)</p> <p>Other costs are imbedded in the in mandatory EHS measures and in Contract</p>

Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsibilities	Timeline	Cost (\$US)
<ul style="list-style-type: none"> <li>Potential child labor and forced labor engaged by primary suppliers which are trading companies.</li> </ul>	<ul style="list-style-type: none"> <li>To mitigate the risk of child and forced labor engaged by primary suppliers, the framework agreements that will be signed between MOET and the importers will include a declaration that they will not use child labor or forced labor</li> </ul>			
<p><b><i>Lack of consideration for vulnerable groups</i></b></p> <p>The project may have a lack of considerations for differentiated treatment for vulnerable groups such as elderly, people pre-existing conditions, the very young and people with disabilities that may not be capable of accessing bread. This may be partly due to smuggling of subsidized wheat which may hinder the access for the most vulnerable populations to affordable bread.</p>	<ul style="list-style-type: none"> <li>TPMA shall follow up closely on the categories of people receiving bread based on WFP and SSNP database for vulnerable groups</li> <li>MOET to follow up on the grievances in a timely manner and take proper measures in case of grievances related to elite capture.</li> <li>Update and implement the SEP that was prepared within the framework of this Project and disclosed on the MOET website and provide stakeholders with timely, relevant, understandable and accessible project related information and project GM, and consult with them on regular basis.</li> <li>Engaging in inclusive consultations with all identified stakeholders including vulnerable groups like refugees.</li> <li>To mitigate the risk of smuggling of subsidized wheat, the framework agreements shall include a provision with the obligation to deliver wheat in Lebanon. To ensure access to affordable bread for the most vulnerable populations the framework agreements shall include provisions</li> </ul>	<p>MOET</p> <p>TPMA</p>	<p>Throughout the project</p>	<p>Cost embedded in TPMA contract and in the Project implementation budget</p>

Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsibilities	Timeline	Cost (\$US)
<i>Risks associated with the transition from current wheat subsidy system to a more market-oriented system</i>	<p>for delivery of wheat to bakeries in areas with high levels of poverty, refugees and their host communities. The project will include TPMA arrangements which will confirm that the bakeries services areas that include poor and vulnerable groups are receiving the flour as per the framework agreement.</p> <ul style="list-style-type: none"> <li>High frequency ‘Listening to Poor and Vulnerable Household Surveys’, entailing data collection on bread prices and consumption for the poor and vulnerable households, by conducting random sampling and surveying (biweekly) using UNHCR and WFP beneficiary lists. This information will be triangulated at MOET level with information consolidated from the consumer protection agency, GM, and WFP price monitoring system, and used to adopt appropriate remedies, such as including in the framework agreement a preferential distribution clause for bakeries located in areas where most of the poor and vulnerable groups are located.</li> <li>Ensure linkages with social safety net programs like the ESSN,</li> <li>Develop and implement a clear communication campaign,</li> </ul>	MOET	Throughout the project	Cost embedded in TPMA contract and in the Project

Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsibilities	Timeline	Cost (\$US)
Additional social risks are associated with the consultancy services and technical assistance under component 2 that will help in MOET's planned transition from the current wheat subsidy system to a more market-oriented system.	<ul style="list-style-type: none"> <li>Ensure an effective and widespread dissemination of the GM.</li> </ul>			implementation budget
<p><b><i>GBV and SEA/SH</i></b></p> <p>Gender inequalities and norms can play an important role for access to bread. Moreover, pandemics can create or exacerbate the conditions that especially put women and girls at greater risk of SEA/SH. For instance, women and girls may be forced into exchanging sexual favors for access to food or even bread.</p>	<ul style="list-style-type: none"> <li>Ensure the people have access to the GM which should be strengthened with referral pathways in the event of SEA/SH complaints</li> <li>Train staff handling the GM on how to handle GBV related complaints</li> <li>All workers should sign the code of conduct to hold them accountable as detailed in the <u>LMP</u>.</li> <li>Publicly post or otherwise disseminate messages clearly prohibiting SEA/SH during the provision of wheat and bread.</li> <li>Prepare Contractor OHS Plan (C-OHSP) that includes requirements for GBV/SEA/SH Prevention.</li> </ul>	MOET	Throughout the project	Cost embedded in Contractors contract and in the Project implementation budget



## 6- Monitoring Plan

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### 6.1 Institutional Setup

The Project will be monitored by MOET. MOET shall maintain the assigned environmental and social focal point who will support management of environmental, social and health & safety (ESHS) risks of the project. A consultant will also be hired on a part-time basis to support the environmental and social focal point in his/her tasks. The MOET will coordinate with relevant agencies and UN partners ([refer to section 3.5](#))

### 6.2 Capacity Building

In order to ensure ESF procedures, instruments and monitoring needs of the Project are well understood the MOET staff and in particular the MOET assigned E&S focal point should be provided by the following training:

- World Bank Environmental and Social Framework
- effective operation of a grievance mechanism and SEA/SH referral pathways
- Stakeholder mapping and engagement
- Emergency preparedness and response

The MOET's limited capacity in application of the World Bank ESF is a risk factor which is expected to be mitigated through the World Bank team's capacity building measures to the E&S assigned focal point throughout the project duration as needed.

### 6.3 Monitoring Plan

During implementation, the MOET assigned E&S focal point will ensure implementation of the E&S requirements outlined in the ESCP, SEP and ESMP and shall ensure documentation accordingly. He/She shall conduct field visits to monitor the E&S activities implemented by Contractors and ensure that the E&S requirements are integrated into the contracts with the suppliers.

MOET assigned environmental and social focal point shall 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, stakeholder engagement activities, and functioning of the GM(s), including but not limited to grievance logs.

The MOET shall promptly notify the World Bank of any incident or accident related to the Project as per the provisions of the ESCP and which has, or is likely to have, a significant adverse effect on the environment, provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. Subsequently, at the World Bank's request, MOET shall prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.

The table below presents the E&S Monitoring plan of the Project.

Table 5: Environmental and Social Monitoring Plan

Impact	Parameters to Monitor	Frequency	Monitoring Location	Monitoring Method	Standard/Guidelines	Institutional Follow-up	Approximate Cost (USD/year)
					National/International		
<b>Environmental Monitoring</b>							
Dust	<ul style="list-style-type: none"> <li>Total Suspended Particles</li> </ul>	When unloading	<ul style="list-style-type: none"> <li>Unloading sites</li> </ul>	<ul style="list-style-type: none"> <li>Visual opacity</li> </ul>	Wearing PPE, use of equipment	MOET	Included in the routine supervision
Wheat quality	<ol style="list-style-type: none"> <li>Infestation by microbes, toxins or fungus</li> <li>Rodents, birds, mites.</li> <li></li> <li>Content of fungi and toxins in wheat</li> </ol>	Before discharge, during unloading and during storage	<ul style="list-style-type: none"> <li>At PoB</li> <li>At PoT</li> </ul>	<ul style="list-style-type: none"> <li>Laboratory analyses One sample per location discharge</li> <li>Visual inspection</li> </ul>	Standards adopted by IRI and LARI	MOET	Included in the routine supervision and in the salary of the environmental and social consultant
Traffic	<ul style="list-style-type: none"> <li>Number of truck accidents</li> </ul>	Continuously-during the implementation of the Project activities	<ul style="list-style-type: none"> <li>On the roads from and to millers</li> </ul>	<ul style="list-style-type: none"> <li>Accident reports</li> </ul>	N.A.	MOET and The transportation contractors, contracted by private mills	Included in the routine work
OHS	<ul style="list-style-type: none"> <li>OHS- training</li> </ul>	Continuously-during the	<ul style="list-style-type: none"> <li>At PoB</li> <li>At PoT</li> </ul>	<ul style="list-style-type: none"> <li>Attendance sheet</li> </ul>	N.A.	MOET	Included in Routine supervision and in the

Impact	Parameters to Monitor	Frequency	Monitoring Location	Monitoring Method	Standard/Guidelines National/International	Institutional Follow-up	Approximate Cost (USD/year)
	<ul style="list-style-type: none"> <li>Total number of work injuries</li> <li>OHS-related internal grievance</li> </ul>	implementation of the Project activities		<ul style="list-style-type: none"> <li>Employee records</li> <li>OHS incident form</li> </ul>			salary of the environmental and social consultant
	<ul style="list-style-type: none"> <li></li> </ul>	Continuously-during unloading and implementation of the Project maintenance activities	<ul style="list-style-type: none"> <li>At PoB</li> <li>At PoT</li> </ul>	<ul style="list-style-type: none"> <li>Training</li> <li>Continuous visual inspection</li> <li>Number of positive COVID-19 cases</li> </ul>	N.A.	MOET	Included in Routine of the Recording number of COVID cases among project workers Number of positive COVID-19 cases and near misses Records of environmental and social consultant
<ul style="list-style-type: none"> <li><b>Social Monitoring</b></li> </ul>							
Working conditions	<ul style="list-style-type: none"> <li>Labor's wages</li> </ul>	Monthly	<ul style="list-style-type: none"> <li>Laborers' contracts</li> </ul>	<p>Workers' complaints records / grievance log</p> <p>Labor law verification</p>	Lebanese Labor Law dated 1946	MOET	Included in Routine Supervision and in the salary of the environmental and social consultant

Impact	Parameters to Monitor	Frequency	Monitoring Location	Monitoring Method	Standard/Guidelines National/International	Institutional Follow-up	Approximate Cost (USD/year)
Child labor	<ul style="list-style-type: none"> <li>Labor's age</li> </ul>	Continuously-during Project lifetime	<ul style="list-style-type: none"> <li>At PoB</li> <li>At PoT</li> </ul>	Labor registry  Government-issued IDs and Badges (age verification)	Lebanese Labor Law dated 1946	MOET	Included in Routine Supervision and in the salary of the environmental and social consultant
Underemployment of Women	<ul style="list-style-type: none"> <li>Percentage of female employees in workforce</li> </ul>	Monthly	<ul style="list-style-type: none"> <li>At MOPH</li> </ul>	Labor registry	N.A.	MOET	Included in Routine Supervision and in the salary of the environmental and social consultant
Lack of consideration for Vulnerable Group	<ul style="list-style-type: none"> <li>Categories of people receiving bread</li> <li>Delivery of wheat to bakeries in high poverty areas</li> <li>No. of consultations with stakeholders and particularly vulnerable groups and no of persons consulted</li> </ul>	Monthly	<ul style="list-style-type: none"> <li>All over the Country</li> </ul>	<ul style="list-style-type: none"> <li>the framework agreements between MOET and the importers</li> <li>third party monitoring agency (e.g. LRC) reporting/ monitoring</li> </ul>		MOET  TPMA	Included in Routine Supervision and in the salary of the environmental and social consultant and the fee of the TPMA

Impact	Parameters to Monitor	Frequency	Monitoring Location	Monitoring Method	Standard/Guidelines National/International	Institutional Follow-up	Approximate Cost (USD/year)
GBV	<ul style="list-style-type: none"> <li>CoC signed by all the workers on the Project workers</li> <li>Delivery of induction training (including GBV)</li> </ul>	Before commencement of works or every time a new worker is recruited	N.A.	<ul style="list-style-type: none"> <li>Signed CoC</li> <li>Training attendance sheet</li> </ul>	N.A.	MOET	Included in Importer's contract
	<ul style="list-style-type: none"> <li>GBV-related internal grievances</li> </ul>	Upon grievance occurrence	N.A.	<ul style="list-style-type: none"> <li>Received complaints and GRM records</li> </ul>	N.A.	MOET	Included in importer's contract
Other Grievances	<ul style="list-style-type: none"> <li>Grievance reports including the referral pathways for SEA/SH and the communities,</li> </ul>	Upon grievance occurrence	N.A.	Complaints records	N.A.	MOET	Included in Routine Supervision and in the salary of the environmental and social consultant

## 7- Consultations and Information Disclosure

### **7.1 Objectives of the Consultations**

WB policies require that broad and open public consultations be held with Project stakeholders that are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project and that may have an interest in the Project. These consultations are to ensure that the stakeholders are provided with the opportunity to engage in the planning process, to raise questions and receive input and responses to their concerns. Stakeholders' consultation helps to identify opportunities and risks, it improves project design / implementation and increases project ownership and sustainability. Consultations took place before and during the preparation of the ESMP.

### **7.2 Initial Consultation with millers**

Initial stakeholders' identification and consultation was conducted during the preparation phase in March 2022 followed by consultations with mills owners at MOET on March 17, 2022. The parties that were present included MOET, 3 mills and the World Bank. The main outcomes of the consultation are (i) Millers pick the sellers through brokers. The brokers shop around based on requirements specified by the millers, (ii) The current total storage capacity of the Country is 125,000 tons (silos and warehouses) which is worth 2 months of consumption (iv) Imports are in the range of 50-60,000 tons per month, (v) Since Russian-Ukrainian war, the prices of wheat increased and fluctuated between 460-520 USD per ton and (vi) the importers/millers indicate that they are able to secure shipments for Lebanon, but because of substantial delays from the central bank, may not be able to purchase the wheat.

### **7.2 Consultation with Stakeholders**

Consultation with stakeholders took place on June 9, 2022. Following are the relevant details:

- Invitations to stakeholder's consultation were sent on Thursday, June 2, 2022 via email with the draft presentation attached (Refer to [Annex B](#)). MOET extended the invite to fifty identified stakeholders but only five have joined.
- The stakeholders' consultation meeting was conducted virtually on Thursday June 9, 2022, at 11:00 Beirut time. In line with available resources for carrying out stakeholder engagement in the context of COVID-19 and the WB's "Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings" dated March 20, 2020. Different institutions/organizations as listed in section 7.2 below.
- The Project components, associated environmental and social risks, impacts and mitigation measures were explained in a Power Point Presentation in addition to the purpose of the ESMP document. The attendees were also informed about the GM and invited to share their thoughts, questions and concerns on the project and given the opportunity to give their feedback or send it later through the different channels that were provided during the presentation as no major comment or concern was raised during the consultation.
- The stakeholders that were present included: the MoI, the Industrial Research Institute (IRI), A group of millers – Represented by the Crown Mills, the Lebanon Humanitarian & Development NGOs Forum (LHDS) and the Customs Clearance Union. Two women were present in the consultations.
- There were no major concern or complaint raised during the consultation of June 9, 2022.

## 8- Grievance Mechanism

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The MOET has in place a formal mechanism for uptake of grievances which are handled by a dedicated office which includes 4 staff working in two shifts Monday to Friday from 8am to 3pm. The grievances are documented in a formal manner but timelines for handling and closing complaint cases are not specified, they depend on the nature of the complaint. As such a consumer complaint about the quality of a product may need laboratory analysis and, in this case, the process is rather lengthy.

### 8.1 Existing channels

The GM aims to provide consumers with accessible, timely, effective and culturally appropriate opportunities to raise their complaints and concerns. It also aims to identify, propose, and implement fair and appropriate solutions in response to the complaints and concerns raised.

Below is the summary of the current **uptake channels** to register a grievance at MOET:

Enquiries or complaints can be raised through different channels:

1. By telephone on the following hotline: 1739 or +961 - 1 - 982360/1/2/3/4/5
2. By email on i) [Info@economy.gov.lb](mailto:Info@economy.gov.lb); ii) [wheat@economy.gov.lb](mailto:wheat@economy.gov.lb)
3. By using an online form provided on the Website: <https://www.economy.gov.lb/tickets/en/new-ticket>
4. Through an application that can be downloaded on the following link: <https://www.economy.gov.lb/en/services/consumer-protection/services-online/consumer-protection-complaint-mobile-application>

The aim is to resolve or respond to the enquiries within the same call where no follow-up is required. Where follow up/investigation is required the reply can take sometimes months. The enquirer will be answered back before closure of the complaint. All complaints/concerns and feedback are documented in a grievance log (see [Annex C](#)).

MoET already established on its website a **complaints Log** and this log frame can be used without a need of adaptation. Four dedicated officers are mandated to collect complaints and they operate during the official working hours.

The grievance mechanism process can be summarized as follows<sup>33</sup>:

#### *Registration of complaints*

Once information that a grievance has been received is channeled into MOET from whatever source, it is entered into a digital register form (sample provided in [Annex C](#)). The Grievance Register is populated by a MOET's Grievance Operator with the following information:

- A unique reference number for the complaint;

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<sup>33</sup> Reference is made to interview with Mr. Tarek Youness, head of the consumer protection unit at the MoET

- The date and time at which the complaint was lodged;
- How the grievance was first brought to the attention of MOET (uptake channel);
- Information about the complainant (name, gender, telephone number and preferred contact details, their place of residence and address); complainant has the right also to raise the grievance anonymously;
- A brief description of the complaint to include details of the location, people involved so that a timeline of events can be created;
- The category of the complaint;
- Time and date in which the complaint was closed/resolved;

A grievance log can be automatically generated digitally. A dedicated software is used to input all the grievances. This software provides also the possibility to filter the grievances as per the operator's request (date, type, feedback of the complainant, etc. )

### ***Investigation***

Any grievance shall be investigated, and an Investigation Report prepared and issued by the MOET. The manager of the consumer protection unit at MOET is responsible for delegating the investigation to relevant personnel based on the type of grievance received. He will review the investigation report and share it with the Director General who will share it with the Minister of the MOET. It is up to the Minister to take the final decision when important breaches are reported.

### ***Responding with a proposed resolution***

MOET will inform the person raising the grievance of the outcome of the Investigation Report and the proposed steps to be taken to resolve the grievance. However, the time frame can stretch over months in the current situation of shortage of financial means and human resources at the MOET. However, the E&S focal point will coordinate closely with the dedicated grievance office and will ensure all grievances are addressed in a timely manner and within a period not exceeding 15 days.

The person raising the grievance will be informed about the resolution steps. Feedback on his acceptance or non-satisfaction is recorded. If the person does not accept the resolution steps, then they will be able to appeal (see below).

The number of grievances received in 2019, and before the proposal of the Emergency Response in Support of Wheat Imports most of the complaints concern the prices of goods and the invoices of the generators. The E&S focal point at the MOET will coordinate with the dedicated office in charge of handling grievances and will follow up on any complaints received which are relevant to the project and document in a GM log.

## **8.2 Adaptation of the GM**

In the frame of the Emergency Response in support of wheat imports, the GM can be adapted to respond better to the requirements of the ESS10. The GM should be amended as follows:

- Vulnerable groups shall be assisted to raise their grievances to the Beirut Bar Association, which can appoint voluntary lawyers to investigate such claims. The MOET can engage Non-Governmental Organizations (NGOs) who can also play a role in defending legal rights of vulnerable groups.



- Referral to identified GBV service providers shall be established and shall be used in case of complaints related to SEA/SH. The MOET can divert such complaints to relevant NGOs such as ABAAD<sup>34</sup> and KAFA<sup>35</sup>.
- The person raising the grievance shall be provided with an acknowledgement within three working days from the point the grievance was first raised, in an appropriate manner. The acknowledgement of receipt shall contain information about the next steps in the procedure, target timeframe and the contact details of the person who can be contacted to follow up. The acknowledgement will be sent by automatic reply upon receipt of the grievance. The aim is to resolve or respond to the enquiries within the same call where no follow up is required. Where follow up is required and for written enquiries, the endeavor is to reply within 5 business days from the 1<sup>st</sup> call. Where more time is required or for complex enquiries, the enquirer will be kept updated on the progress within a period not exceeding 15 days.
- MOET shall prepare a ‘lessons learned’ document that outlines the steps taken to avoid similar grievances from re-occurring in the future
- All operators handling the GM will be trained as needed including on the referral pathways in the event of SEA/SH complaints
- There will be close coordination between the dedicated department and the E&S focal point for the project
- All complaints will be recorded in a GM log

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<sup>34</sup> <https://www.abaadmena.org/>

<sup>35</sup> <https://kafa.org.lb/en/about>

## 9 Labour Management Procedures

### 9.1 Overview of labor use on the Project

Based on available information, this section describes the Project workers, their characteristics, the timing of labor requirements, the anticipated or known contracting structure for the project, with numbers and types of suppliers and the likely number of project workers to be employed or engaged on the Project.

This LMP set out the principal approach to manage project workers in accordance with the national law requirements and the World Bank's Environmental and Social Standard 2 on Labor and Working Conditions (ESS2) are outlined below. The purpose of this LMP is to identify the main labor requirements and risks associated with the project, including maintaining a safe working environment for workers throughout the COVID-19 pandemic. The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP is applicable, as per ESS2 to the Project in the following manner and as per Table 1:

The component will also support consultancy services and technical assistance that will strengthen MOET's capacity to manage the transition from the current wheat subsidy system to a more market-oriented system.

**Table 6: Overview of labor use on the Project**

Workers Type	Number of Workers	Local Residents	Imported/ Foreign Workers	Staff Under 18	Timing of Engagement	Type of Job or Skills
Direct Workers (MOET civil servants and seconded staff and consultants)	5	5	0	0	Q3 2022- Q3 2023	Technical & Financial Staff including E&S focal point and consultants
Contracted Workers (employees of wheat importers, unloading and transportation contractors and TPMA)*	88	50	38	0	Q3 2022- Q3 2023	Technical & Financial Staff and workers
Primary Supply Workers	Not determined at this stage	Not determined at this stage	Not determined at this stage	Not determined at this stage	Not determin	Not determined at this stage d

					ed at this stage
Community Workers	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

\*Number of workers directly responsible for the disinfection+ Number of unloading contractors' employees (11) + Number of transportation employees (75) truck drivers.

## 9.2 Assessment of key potential labor risks

Given the nature of the Project intervention, the key labor risks which may be associated with the project include:

- Risks on Project workers related to labor and working conditions that are not compliant with either the Lebanese Labor Law or ESS2. For example, wages do not proportionate with tasks performed or industry standards, discrimination towards women and workers with disabilities or other vulnerabilities, unlawful termination, withholding of benefit etc.,
- Lack of understanding and implementation of Occupational Health and Safety (OHS) requirements for the unloading and transportation contractors' workers that will be contracted by the wheat importers including the special requirements in the context of COVID-19 outbreak,
- Inadequate Grievance Mechanism (GM) to handle complaints and concerns for all the Project Workers, and
- Potential Sexual Exploitation and Abuse/Harassment (SEA/SH) risks and Gender-Based Violence (GBV) among the Project workers.

It is to be noted that the Project will not involve any civil works.

## 9.3 Brief overview of labor legislation: Terms and conditions

The national labor legislation is governed by **the Labor Law No.23 dated September 1946** and its modifications that will apply to all the Project workers. A brief overview of the legislation is summarized below:

### On employment of children:

- It is absolutely forbidden to set to work adolescents who have not yet completed their thirteenth year of age. An adolescent may only begin to work after a medical examination to ascertain that he can carry out the work for which he was hired.
- It is forbidden to set adolescents to work in industrial enterprises or in jobs too strenuous or detrimental to health before they have completed their fifteenth year of age. It is also forbidden to set adolescents work before they have completed their sixteenth year of age 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.

- Every adolescent employed in an establishment for at least one year shall be entitled to an annual holiday of 21 days with full pay.

A child over 14 and under 18 may be employed provided the following conditions apply:

- Work does not jeopardize the health, safety, or morals of the children.
- An appropriate risk assessment is conducted prior to commencing work.
- The employer conducts regular monitoring of health, working conditions, and hours of work.

**As per ESS2, the minimum age of employment or engagement in connection with the project shall be 14 therefore for these particular requirements of the ESF, ESS2 will apply because it is more stringent: Workers below 14 years old will not be engaged in any activity of the Project.**

#### **On employment of women:**

- The employer may not discriminate between working men and women with regards to type of work, amount of wage or salary, employment, promotion, professional qualification, and apparel.
- Women working in all categories are entitled to a delivery holiday of seven weeks, comprising the periods before and after delivery, on presentation of a medical certificate stating the presumed date of delivery. The wage or salary shall be paid in full during the delivery holiday.
- It is forbidden to dismiss or to serve notice of dismissal on a woman lying-in, unless she is convicted of having been employed elsewhere during the said period.

#### **On hours of work and overtime**

- The maximum duration of work per week is 48 hours except for agricultural corporations.
- In case of emergency, it is permissible to raise the duration of work to 12 hours per day on the condition that the wage or salary for the overtime provided by the wage-earner or salary-earner is 50% higher than the rate of normal hours.

#### **On Wages and benefits**

- The minimum pay must be sufficient to meet the essential needs of the wage-earner or salary-earner and his family. Pay is not to be less than the official minimum pay.

#### **On leaves and rest per week**

- Every wage-earner or salary-earner employed in an establishment for at least one year is entitled to an annual leave of 15 days with full pay.
- Every wage-earner or salary-earner employed in an establishment for at least one year is entitled to annual leave of fifteen days with full pay.

- Every wage-earner or salary-earner is entitled to sick leave in accordance with his period of service. The wage-earner or salary-earner may not be dismissed during sick leave.
- Whenever the duration of work exceeds six non-stop hours for men and five non-stop hours for women, the employer is required to allow these wage-earners and salary-earners in the middle of the day, a rest-time which is not to be under one hour. A rest-time of unbroken nine hours is to be allowed for wage-earners and salary-earners every twenty-four hours, except in cases where the circumstances of work compel otherwise.
- All wage-earners and salary earners are to be granted a weekly rest which must not be under thirty-six unbroken hours. The employer is to select the day of this rest or distribute it among wage-earners and salary-earners in sympathy with the requirements of the work.

### **On termination of employment**

- The employer and the worker shall each have a right to terminate at any time the work of unspecified duration concluded between them. The aggrieved party shall be entitled to claim indemnity.

An employee or an employer who wishes to terminate the employment after completing the probation period shall be given one month's notice if the employee has three years or less of continuous service, or two months' notice if he/she has more than three years but less than six years of continuous service and three months if he/she has more than six years and less than 12 years of continuous service and four months if he/she has more than twelve years of continuous service. (Article 50 of the Labor Law).

- The dismissal notice may not be served on the expectant mother, the woman on delivery holiday and any wage-earner or salary-earner on ordinary holiday or on sick leave.

### **On workers' organizations**

- In every category of professions, employers on one hand, and wage-earners or salary-earners may set up a special trade union. This trade union is of juridical personality and is qualified to initiate legal proceedings.
- Any employer or wage-earner is free to adhere to a trade union.
- The trade union management is also provided in the Law

### **On SEA/SH**

Pursuant to law 205 dated 2020, the sexual harassment is criminalized in any location including at work. Anyone who commits a crime of sexual harassment shall be punished by imprisonment from one month to one year and a fine ranging from three times to ten times the official minimum wage, or one of these two penalties.

## **9.4 Brief overview of labor legislation: Occupational Health and Safety**

Decree No. 11802 is pursuant to the ILO Conventions signed by the Government of Lebanon. It sets out the key aspects regulating occupational prevention, safety and Health in all enterprises subject to the Code of Labour. The Decree comprises the following chapters:

- i. Chapter 1: Prevention and safety
- ii. Chapter 2: Health
- iii. Chapter 3: Safe use of chemicals at work
- iv. Chapter 4: Prevention from the dangers of working with benzene
- v. Chapter 5: General provisions

The said decree sets that the employer should:

- Install safety provisions and measures to prevent any risks to the health and safety of the workers and limits the maximum time allowed to workers' exposure to dust, noise and vibrations and limit the period of exposure as per the limits set in the said Decree. The employer shall also resort to possible scientific means for eliminating or reducing noise.
- The employer shall provide the workers with the appropriate personal prevention and protection uniforms and gears, ensure their maintenance and preserve them in good conditions for later use, without the workers being liable to pay any costs.
- The employer shall take the general measures of health protection in the workplace, especially in relation to safety, lighting, ventilation, aeration, drinking water, lavatories, evacuation of dust and smoke, and hygiene measures to protect workers from pollution by pathological biological factors.
- Workers shall be given sufficient and appropriate information on the risks related to their work.

## 9.5 Responsibility Staff

This section identifies the functions and/or individuals within the project responsible for:

- Engagement and management of project workers,
  - Engagement and management of contractors/subcontractors,
  - OHS,
  - Training of workers, and
  - Addressing worker grievances.
- MOET will be responsible for the engagement of the Project staffing and wheat importers.
  - MOET E&S focal point will oversee implementation of the OHS aspects of the Project including the relevant trainings and awareness sessions.
  - The wheat importers will be responsible for the OHS of the workers.

- MOET E&S focal point with the support of the environmental and social consultant will be responsible for following up on the Project Workers' grievances.
- MOET E&S focal point will be responsible for following up on SEA/SH referrals with the support of the environmental and social consultant.

## 9.6 Policies and Procedures

This section sets out information on OHS, reporting and monitoring and other general project policies. Where relevant, it identifies applicable national legislation.

MOET's E&S focal point has the overall responsibility to oversee all aspects of the implementation of the LMP. MOET's commitments include the following:

- Every employee and contractor working on behalf of MOET or working under a contract signed with MOET is expected to share MOET's commitment to pursue the goal of not harming people. The following elements will be integrated into the planning process of the parties involved in the execution of the Project:
    - Environmental protection, occupational and community health and safety, gender equality, child protection and considerations for vulnerable people (including those with disabilities);
    - Provision against SEA/SH, GBV;
    - Provision for COVID-19 awareness and prevention, and;
      - Iv Minimize the risk of pandemic notably COVID-19 transmission and to mitigate the effects of COVID-19 associated with the execution of the Works;
  - MoET will provide the following Trainings for its staff:
- 4 MOET assigned E&S focal point on the World Bank Environmental and Social Framework and effective operation of a grievance mechanism
  - 5 MOET on emergency preparedness and response

## 9.7 Age of Employment

The minimum age for employment on the project shall be 14 as set in the World Bank's ESF ESS2. For workers of an age between 14 and 18, the Lebanese Labour law will be applied.

## 9.8 Terms and Conditions

The employments of workers shall follow the terms and conditions set by the Lebanese Labour Law No. 23 dated September 1946 described in [section 9.3](#) above and the following conditions. In case of discrepancy, the following conditions will prevail, being more stringent. Where the national legislation diverges from EES2, the Project shall abide by the requirement of ESS2 and by the terms and conditions provided below.

- i. All the Project workers should be informed on the hours of work per days and their wages before the start of their works. Provisions in any

contract must be added that project workers should not be asked to work more than 48 hours per week, in line with Lebanese labour law.

- i. All the Project workers will be paid at the minimum wages under national law, including migrants and refugees.
  - ii. Any discrimination based on personal characteristics unrelated to inherent job requirements, in particular with regards to compensation, recruitment, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices is prohibited.
  - iii. Recruitment procedures will be transparent, public, and non-discriminatory with respect to ethnicity, religion, sexual orientation, disability, and gender.
- ii. Any discrimination based on gender is prohibited and adopted measures on harassment include:
  - The adoption of a zero-harassment policy for all the Project workers. The zero-harassment policy can be part of the workers Code of Conduct developed by the project. (Refer to sample in Annex F). This policy should be communicated to all workers through various mediums and formats.
  - A requirement that the project will provide extra induction for female workers to ensure they are aware of the project's policies on harassment and intimidation.
  - A requirement for the establishment of a GM and / or confidential advisor to be used specifically for allegations of sexual harassment.
- iv. The Project will not restrict project workers who are not entitled to form unions under national law to form other committees to represent their interests.
- v. All project contracts with contractors and subcontractors will contain the requirement that all workers must be of the age of 14 or more, and that they must be of the age of 18 or more for performing hazardous tasks.
- vi. The Project will make sure the existing GM will be amended to accommodate for workers' grievances and it will include:
  - Stipulated timeframes to respond to grievances,
  - Responsible office/department to receive, record and track resolution of grievances.

All Project workers will be made aware of the grievance mechanism at the time that they are hired. All the above mentioned requirements should be cascaded to wheat importers and their workers' sub-contractors.



The MOET E&S focal point will check on the proper implementation of the terms and conditions.

## 9.9 Grievance Mechanism

MOET has an existing GM in place (see [section 8](#)). This existing GM will also be used to receive Grievance from MOET Direct Workers Contracted Workers (employees of wheat importers) and Primary Supply Workers. The civil servants that are already receiving Grievances within the dedicated department at the MOET will monitor the recording and resolution of grievances, and report these to the E&S focal point who will also follow and ensure coordination with this department.

MOET shall maintain, throughout the Project implementation, and publicize the availability of a GM, in form and substance satisfactory to the WB, to hear and determine fairly and in good faith all complaints raised by the Project's workers in relation to the Project, and take all measures necessary to implement the determinations made by such mechanism in a manner satisfactory to the Bank. The complainants should be given the possibility to remain anonymous if they do not wish to reveal their identity.

A summary of the proposed modification is presented below:

- Enquiries or complaints can be raised through the same existing channels (provided in section 8) channels:
- The aim is to resolve or respond to the enquiries within the same call where no follow up is required. Where follow up is required and for written enquiries, the endeavor is to reply within 5 business days from the 1<sup>st</sup> call. Where more time is required or for complex enquiries, the enquirer will be kept updated on the progress.
- The GM will address all these complaints within a reasonable time, protect against retaliation and allow for escalation of complaints. If complaints are not resolved in time by the GM, this should be reported to MOET Director General of GDCS. During implementation of the Project, a summary of the grievances received will be included in the bi-annual report to the WB. The GM should be broadly communicated to all MOET Direct workers, Contractors (Unloading and transportation contractors) and Stakeholders.

MOET will ensure that Project workers shall be informed of the GM at the time of recruitment. The mechanism will be based on the following principles:

- The GM should have a channel accessible to all the categories of workers.
- The GM should also have referral pathways in the event of SEA/SH complaints Appeals process availability
- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances, and all grievances will be treated confidentially.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.
- In the event when a complainant is not satisfied with the resolutions, he can escalate it to the MOET Director General.

### **9.10 Contractor Management**

MOET will make sure that contractual provisions related to the management of labor issues, including OH&S are put in place for the participating wheat importers and that all Project workers are informed about MOET GM.

MOET environmental and social focal point will manage and monitor the implementation of E&S mitigation measures and the performance of the wheat importers and will ensure documentation.

### **9.12 Primary Supply Workers**

MOET will contract wheat importers who may contract the unloading and transportation contractors. The wheat importers will be responsible for including the same conditions on ESHS aspects to its subcontracting agreements. MOET E&S focal point, with the support of the environmental and social consultant will be responsible for following up on this issue.

## Annexes

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**Annex A: Checklist E&S requirements to be followed by offloading contractors**

**Annex B: Outlines of the presentation during Stakeholders' Consultation on June 9, 2022**

**Annex C: Grievance Log Sheet Proposed Grievance Reporting Form and Register**

**Annex D: Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings**

**Annex E: Sample Code of Conduct in Arabic**

**Annex F: Sample Contractor/Supplier Code of Conduct**

**Annex G: Sample Individual Code of Conduct in English**

**Annex H: Areas of Wheat Cultivation in Lebanon (CNRS)**

**Annex I: Project Grievance Mechanism to address SEA/SH Grievances**

## **Annex A: Checklist E&S requirements to be followed by offloading contractors (Developed by MOET for the Project)**

<b>OHS</b>	<b>YES/NO</b>
Did the contractor prepare an OHS Plan (C-OHSP) that includes COVID19 prevention measures?	
Are workers wearing adequate PPEs?	
Is there a dedicated OHS specialist/supervisor on site?	
Are reporting procedures in place for near-misses, incidents, accidents, injuries, complaints or other potential issues? Any reports?	
Emergency procedures in place for potentially dangerous practices, near-misses, incidents, accidents, injuries, complaints or other potential issues?	
<b>Environmental</b>	
Are fire-fighting equipment available and operational in the sanitization truck?.	
Did staff get basic training in fire control.	
Are the fire emergency telephone numbers displayed in communal areas?	
<b>Social</b>	
Are the workers aware of the existence of a GM?	
Is there any suspected child labor?	
Were workers trained and aware on Sexual Exploitation and Abuse, Sexual Harassment, Gender Based Violence and Code of Conduct?	
Did the workers understand and sign codes of conduct?	

### Annex B: Outlines of the presentation during Stakeholders’ Consultation on June 9, 2022

Double click

6/3/2022



## Annex C: Grievance Log Sheet Proposed Grievance Reporting Form and Register

مديرية حماية المستهلك استقصاء مركز تلقي الشكاوى															
مستهلك		مستهلك / تاجر		هبة نجدي		المرشد		3/21/2022 11:43:57 AM		التاريخ		00000/2022		رقم التسجيل	
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اللقب		الاسم		العائلة		-		-		-		-		-	
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Grievance Log	
Name of recorder	
Date last update	
Version number	

Colour coding	
Ongoing	
Closed-out	
Appeal process	

Recording Actions						Response Actions					Preventing Reoccurrences	
Grievance Ref No.	Status (see colour coding)	Date received	Identity of the person/group raising the grievance	Summary of the grievance	Category of grievance (labor-related, procurement, SEA/SH, etc.)	Has a copy of the paper form been provided to the person raising the grievance? If yes, then add the date.	Who is leading the investigation of the grievance?	What was the proposed response?	Number of working days the response was provided:	Has the proposed response been accepted?	Was an appeal raised?	What actions were undertaken to prevent a re-occurrence of the grievance from occurring in the future?
1												
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## **Annex D: Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings**

With the outbreak and spread of COVID-19, people have been advised, or may be mandated by national or local law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Countries have taken various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings.

These restrictions have implications for World Bank-supported operations. In particular, they will affect Bank requirements for public consultation and stakeholder engagement in projects, both under implementation and preparation. WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

This Note offers suggestions to World Bank task teams for advising counterpart agencies on managing public consultation and stakeholder engagement in their projects, with the recognition that the situation is developing rapidly and careful regard needs to be given to national requirements and any updated guidance issued by WHO. It is important that the alternative ways of managing consultation and stakeholder engagement discussed with clients are in accordance with the local applicable laws and policies, especially those related to media and communication. The suggestions set out below are subject to confirmation that they are in accordance with existing laws and regulations applying to the project.

**Investment projects under implementation.** All projects under implementation are likely to have public consultation and stakeholder engagement activities planned and committed as part of project design. These activities may be described in different project documents, and will involve a variety of stakeholders. Commonly planned avenues of such engagement are public hearings, community meetings, focus group discussions, field surveys and individual interviews. With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Taking into account the importance of confirming compliance with national law requirements, below are some suggestions for task teams' consideration while advising their clients:

Task teams will need to review their project, jointly with the PMUs, and should:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations.
- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders (international, national, local) etc.
- Assess the level of risks of the virus transmission for these engagements, and how restrictions that are in effect in the country / project area would affect these engagements.



- Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines. For example, selection of resettlement options by affected people during project implementation. Reflecting the specific activity, consider viable means of achieving the necessary input from stakeholders (see further below).
- Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, task teams should discuss and agree with PMUs the specific channels of communication that should be used while conducting stakeholder consultation and engagement activities. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, zoom and skype;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, such as would be the case for Resettlement Action Plans or Indigenous Peoples Plans preparation and implementation, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
  - i. An appropriate approach to conducting stakeholder engagement can be developed in most contexts and situations. However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, the team should discuss with the PMU whether the project activity can be rescheduled to a later time, when meaningful stakeholder engagement is possible. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

**Investment projects under preparation.** Where projects are under preparation and stakeholder engagement is about to commence or is ongoing, such as in the project E&S planning process, stakeholder consultation and engagement activities should not be deferred, but rather designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. Some suggestions for advising clients on stakeholder engagement in such situations are given below. These suggestions are subject to the coronavirus situation in country, and restrictions put in place by governments. The task team and the PMU should:

- Review the country COVID-19 spread situation in the project area, and the restrictions put in place by the government to contain virus spread;
- Review the draft Stakeholder Engagement Plan (SEP, if it exists) or other agreed stakeholder engagement arrangements, particularly the approach, methods and forms of engagement proposed, and assess the associated potential risks of virus transmission in conducting various engagement activities;
- Be sure that all task team and PIU members articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings, and minimize direct interaction between project agencies and beneficiaries / affected people;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, zoom and skype meetings;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently. Such channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project. WebEx, Skype, and in low ICT capacity situations, audio meetings, can be effective tools to design virtual workshops. The format of such workshops could include the following steps:
  - *Virtual registration of participants:* Participants can register online through a dedicated platform.
  - *Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics:* These can be distributed online to participants.
  - *Review of distributed information materials:* Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.
  - *Discussion, feedback collection and sharing:*
    - Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this.
    - Group, team and table discussions can be organized through social media means, such as WebEx, skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.
  - *Conclusion and summary:* The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.
- In situations where online interaction is challenging, information can be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp groups, Project web links/ websites, and traditional means of communications (TV, newspaper, radio, phone calls and mails with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.

- j. *Engagement with direct stakeholders for household surveys*: There may be planning activities that require direct stakeholder engagement, particularly in the field. One example is resettlement planning where surveys need to be conducted to ascertain socioeconomic status of affected people, take inventory of their affected assets, and facilitate discussions related to relocation and livelihood planning. Such survey activities require active participation of local stakeholders, particularly the potentially adversely affected communities. However, there may be situations involving indigenous communities, or other communities that may not have access to the digital platforms or means of communication, teams should develop specially tailored stakeholder engagement approaches that will be appropriate in the specific setting. The teams should reach out to the regional PMs for ENB and Social Development or to the ESSA for the respective region, in case they need additional support to develop such tailored approaches.
- k. In situations where it is determined that meaningful consultations that are critical to the conduct of a specific project activity cannot be conducted in spite of all reasonable efforts on the part of the client supported by the Bank, the task team should discuss with the client whether the proposed project activities can be postponed by a few weeks in view of the virus spread risks. This would depend on the COVID-19 situation in the country, and the government policy requirements to contain the virus spread. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

## Annex E: Sample Individual Code of Conduct in Arabic

### مدونة سلوك - Code of Conduct

تعتبر مدونة السلوك هذه وثيقة ضرورية لحماية جميع العاملين في مشروع من جميع مظاهر العنف القائم على أسس اجتماعية، التمر، سوء المعاملة، التحرش والاعتداء والاستغلال الجنسي وأي سلوك اجتماعي آخر يخل بحقوق الانسان، المجتمع المحلي والأداب العامة، بما في ذلك المعايير التالية:

<p>• الالتزام بمعاملة النساء والرجال والشباب باحترام بغض النظر عن انتمائهم الديني، العرقي، الطائفي، اللغوي، التوجه السياسي، الاعاقة، الجنسية، الجندرة، الخ.</p> <p>• احترام موقع العمل وادوات العمل المشتركة: نظافة المكان، عدم التعدي على الممتلكات العامة المجاورة للأعمال، الخ.</p>	<p>١- التزام الاحترام والأداب العامة</p>
<p>• العنف القائم على النوع الاجتماعي: أي فعل مؤذ يُرتكب ضدّ إرادة الشخص. وهو مبنيّ على الفروق بين الذكور والإناث التي يُعزى وجودها لأسباب اجتماعية.</p> <p>• العنف الجنسي: الاغتصاب، الاعتداء الجنسي، التحرش الجنسي، الخ.</p> <p>• العنف الجسدي: الضرب، الصفع، الضرب المتكرر أو باستعمال أداة، الخ.</p> <p>• العنف العاطفي: الاستغلال النفسي، والابتزاز، الخ.</p> <p>• العنف الاقتصادي: الحرمان من الموارد، الحصول على أدوات العمل ، عدم الالتزام بالأجر المتفق عليه، الخ.</p>	<p>٢- عدم استعمال العنف بشتى اشكاله</p>
<p>الالتزام بالتصدي لأي شكل من أشكال التحرش أو التمييز أو التخويف أو الاستغلال أو الاعتداء الجنسي بما في ذلك التعليقات المهينة المتعلقة بالميل الجنسي، القح باللقاب أو عبارات ذات دلالات جنسية، التحديق بطريقة ذات إيحاء جنسي، اللمس غير مرغوب فيه، القيام بحركات جنسية غير لائقة، تبادل الحكايات أو النكات الجنسية، توجيه رسائل ذات إيحاء جنسي بأي شكل من الأشكال، محاولة الاعتداء الجنسي أو ارتكابه، بما في ذلك الاغتصاب.</p>	<p>٣- التحرش والاعتداء والاستغلال الجنسي</p>

أنا الموقع أدناه، أقر بأنني قرأت وتبنيّ عليّ وفهمت وتلغيت الشرح والتدريب والمعلومات الكافية عن مدونة السلوك التابعة لمشروع الطرقات والعمالة. وأوافق على الامتثال للمعايير الواردة فيها وأعرف أن أي إجراء يتعارض مع مدونة السلوك هذه قد يؤدي إلى اتخاذ إجراء تأديبي وقد يؤثر على استمرارية عملي ضمن مشروع الطرقات والعمالة.

<p>اسم وامضاء المشرف على الاعمال (من قبل الاستشاري)</p>	<p>اسم وامضاء مسؤول الموقع (من قبل المتعهد)</p>	<p>اسم وامضاء العامل</p>
<p>التاريخ:</p>	<p>التاريخ:</p>	<p>التاريخ:</p>

العامل يجيد القراءة، وقد دون اسمه وامضاءه

العامل لا يجيد القراءة، وقد تُلّيت عليه مدونة السلوك وتم الامضاء نيابةً عنه من قبل الأخصائي الاجتماعي

## Annex F: Sample Contractor/Supplier Code of Conduct

### Contractor Code of Conduct:

- All employees, associates, and representatives commit to treating women, children (under the age of 18), and men with respect, regardless of race; color; language; religion; political or other opinion; national, ethnic or social origin; sexual orientation or gender identity; disability; birth or other status.
- GBV constitutes acts of gross misconduct and is therefore grounds for sanction, which may include penalties and/or termination of employment. All forms of GBV are unacceptable, regardless of whether they take place on the worksite, the worksite surroundings, or off-site. In addition to the potential sanctions listed above, legal prosecution will be pursued, if appropriate, for any employees, associates, and representatives alleged to have committed GBV.
- Demeaning, threatening, harassing, abusive, or sexually provocative language and behavior are prohibited among all company employees, associates, and representatives.
- Sexual favors, making promises or favorable treatment dependent on sexual acts are prohibited.
- Unless there is the full consent by all parties involved, sexual interactions between the company's employees (at any level) and members of the surrounding communities are prohibited. This includes relationships involving the withholding or promise of any kind of reward.
- All employees, including volunteers and sub-Contractors are expected to report suspected or actual GBV by a fellow worker, whether in the same company or not. Reports must be made in accordance with GBV allegation procedures.
- All employees are required to attend an induction training course prior to commencing work on site to ensure they are familiar with the GBV Code of Conduct.
- All employees must attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the institutional GBV Code of Conduct.
- All employees will be required to sign an individual code of conduct confirming their agreement to support GBV activities.

I do hereby acknowledge that I have read the foregoing GBV Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to prevent and respond to GBV. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

Company Name:

Signed by:

Title:

Date:

## Annex G: Sample Individual Code of Conduct in English

- This individual Code of Conduct should be signed by all employees, from senior managers through the operational staff, and should also be required from any Contractors working with the company.
- I, \_\_\_\_\_, acknowledge that preventing gender-based violence (GBV) is important, and that preventing it is my responsibility. At [Company], GBV activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. All forms of GBV are unacceptable, be it on the worksite, the worksite surroundings, or in the community. Prosecution of those who commit GBV may be pursued if appropriate.
- I agree that while working on the [Project], I will:
- Consent to a police background check.
- Treat women, children (persons under the age of 18), and men with respect regardless of race; color; language; religion; political or other opinion; national, ethnic or social origin; sexual orientation or gender identity; disability; birth or other status.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not request or engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts.
- Understand that unless there is the full consent by all parties involved, sexual interactions between the company’s employees (at any level) and members of the surrounding communities are prohibited. This includes relationships involving the withholding or promise of monetary or non-monetary reward.
- Attend and actively partake in training courses related to HIV/AIDS and GBV as requested by my employer.
- Report through the GM or to my manager any suspected or actual GBV by a fellow worker, whether in my company or not, or any breaches of this Code of Conduct.
- Other behavioral expectations: I am accountable for conducting myself in a responsible and ethical manner that upholds and promotes Ministry of Economy and Trade (MOET) values. This includes representing MOET in a professional manner at all times by applying the highest standards of ethical behavior, appropriate conduct, and professional attire in everything performed.

[Company] has established a GM for receiving, reviewing, and addressing allegations of GBV. If an employee has breached the Code of Conduct, the employer will take disciplinary action which could include:

- i. Informal warning
- ii. Formal warning
- iii. Additional training
- iv. Loss of up to one week’s salary
- v. Suspension of employment (without payment of salary), for a minimum period of one month up to a maximum of six months
- vi. Termination of employment

In addition to the above, if warranted, [Company] will report the employee to the police as per local legal regulations.

I understand that it is my responsibility to use common sense and avoid actions or behaviors that could be construed as GBV or breach this Code of Conduct. I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action and may affect my ongoing employment.

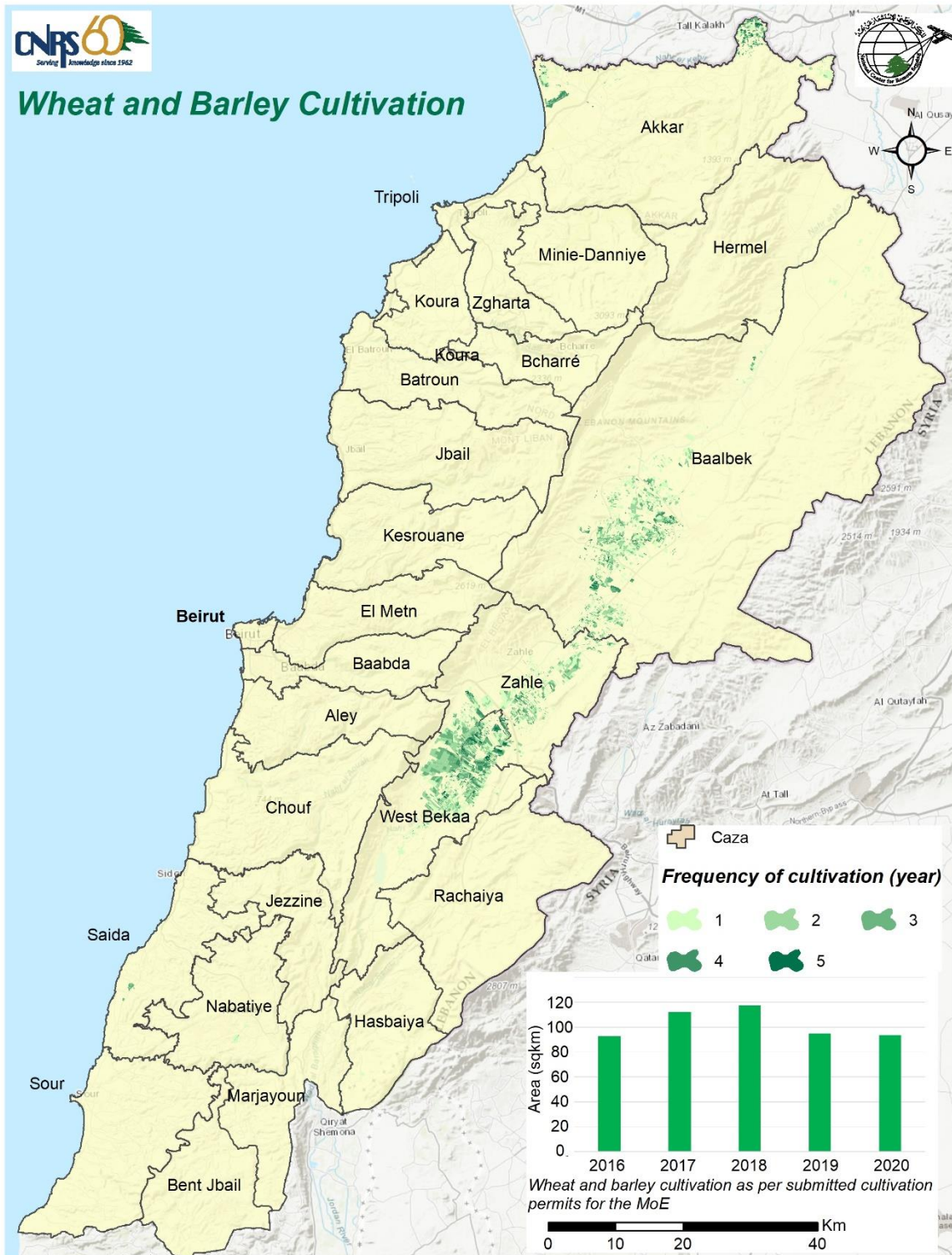
Individual Name:

Signed by:

Title:

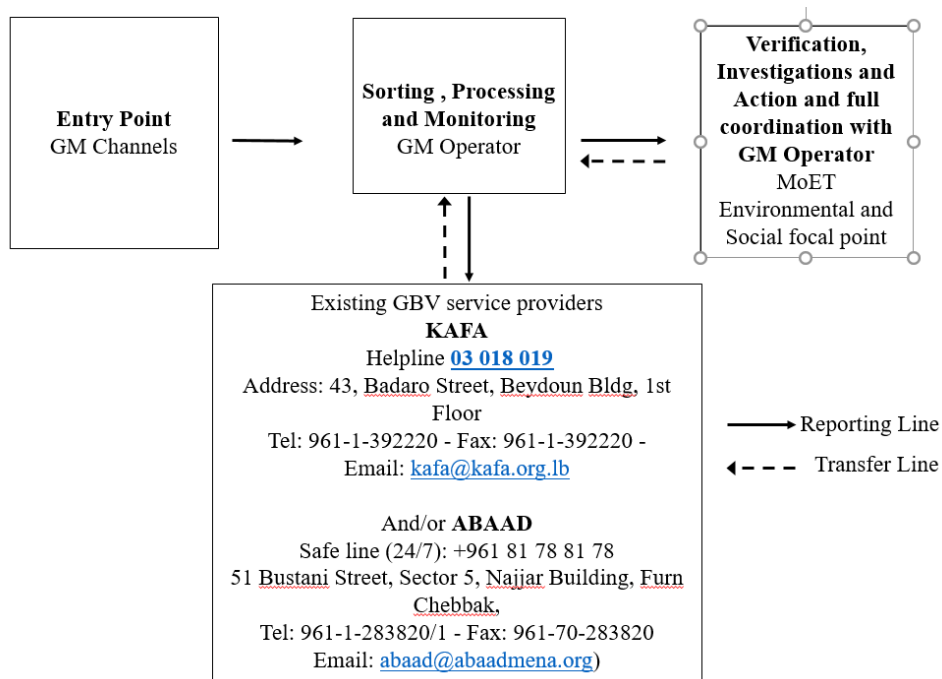
Date:

## Annex H: Areas of Wheat Cultivation in Lebanon (CNRS)





## Annex I: Project Grievance Mechanism to address SEA/SH Grievances



### Notes :

1. This model will be further tailored to the Project needs
2. This model of Project Grievance Mechanism to address SEA/SH Grievances will follow the principles of confidentiality and anonymity and data privacy
3. Any SEA/SH incident will be immediately reported to the World Bank Team as per the provisions of the ESCP