

Lebanese Republic
Office of the Minister of State for
Administrative Reform (OMSAR)

Lebanon Digital Acceleration Project (P506791)

ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

Final Negotiated
September 30, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Lebanese Republic (the “Borrower”) will implement the Lebanon Digital Acceleration Project (the “Project”) through the Office of the Minister of State for Administrative Reform (OMSAR), in close collaboration with other key ministries, including the Office of the Minister of State for Technology and Artificial Intelligence, the Ministry of Interior and Municipalities, the Ministry of Industry, the Ministry of Justice, and other relevant sectoral ministries, as set out in the Loan Agreement (the “Agreement”). The International Bank for Reconstruction and Development (the “Bank”), has agreed to provide financing for the Project, as set out in the Agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time, if necessary, during Project implementation and operation, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower shall agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower’s Representative specified in the Agreement. The Borrower shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below, irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE Establish and maintain a Project Implementing Unit (PIU) within OMSAR, with qualified personnel and adequate resources, to manage the Project's environmental, social, health, and safety (ESHS) risks and impacts. This includes recruiting a dedicated E&S Specialist.	Establish the PIU as per the timeframe established in the Agreement. Recruit an E&S specialist no later than 30 days after the Effective Date. Thereafter, maintain the PIU, including the E&S specialist throughout Project implementation.	OMSAR (establishment of PIU) OMSAR through PIU (recruitment of E&S specialist)
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: • Training for PIU staff on stakeholder engagement, grievance redress, and the management of E&S risks and impacts, including community health and safety, as well as sexual exploitation and abuse/sexual harassment (SEA/SH). • Training/awareness sessions for contractors on stakeholder engagement, grievance redress, and the Environmental and Social Management Plan (ESMP), including occupational health and safety (OHS), community health and safety, and SEA/SH. • Training for E&S focal points at OMSAR and sectoral ministries implementing Project activities on environmental and social risk management, to support their transition to the Borrower's framework.	To be implemented during the first year of the Project and as needed thereafter throughout the Project's lifecycle. Prior to commencing works and throughout Project implementation and operation.	OMSAR through PIU
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Bank regular monitoring reports on the Project's ESHS performance. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out according to the Stakeholder Engagement Plan (SEP). • Complaints submitted to the grievance mechanism by workers and communities, the grievance log and progress made in resolving these complaints. • Compliance with ESSs during the implementation of Project activities. • E&S performance of contractors and subcontractors, as documented in monthly reports submitted by contractors and supervision firms. • Number and resolution status of incidents and accidents reported under Action E below.	Starting from the Effective Date, bi-annual reports shall be submitted to the Bank no later than 15 days after the end of each reporting period and maintained throughout Project implementation.	OMSAR through PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to submit monthly monitoring reports on E&S performance, based on the metrics specified in their respective bidding documents and contracts, and share these reports with the Bank.	Include a requirement in construction contracts for monthly reporting to begin one month after the start of activities. Submit monthly reports to the Bank upon request.	OMSAR through PIU
E	INCIDENTS AND ACCIDENTS Notify the Bank of any project-related incident or accident that has, or is likely to have, a significant adverse effect on the environment, affected communities, the public, or workers. This includes, but is not limited to, fatalities or significant injuries to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity; environmental pollution; forced or child labor; displacement without due process (forced eviction); allegations of SEA/SH; and disease outbreaks. Conduct an appropriate investigation to identify the immediate, underlying, and root causes of the incident or accident. Prepare, agree upon with the Bank, and implement a corrective action plan detailing measures to address the issue and prevent recurrence. If requested by the Bank, prepare a detailed incident or accident report and propose additional preventive or corrective actions as necessary.	Notify the Bank no later than 48 hours after becoming aware of any incident or accident, providing available details upon request. Submit the review report and corrective action plan to the Bank no later than 30 days after the initial notification, unless an alternative timeframe is agreed upon in writing by the Bank. This notification and reporting procedure shall remain in effect throughout Project implementation.	OMSAR through PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS Prepare, disclose and implement site-specific ESMPs for data center construction (Associated Facility), in agreement with the Bank and in accordance with terms of reference acceptable to the Bank, consistent with relevant ESSs.	Prepare the ESMP and incorporate it into the respective bidding documents before carrying out Project activities that require the ESMP. Once finalized, implement the ESMP throughout the Project's duration.	OMSAR, through the PIU, will require the Associated Facility's operator to implement these measures.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	MANAGEMENT OF CONTRACTORS Incorporate relevant aspects of the ESCP, including, inter alia, the ESMP and code of conduct, into the E&S specifications of procurement documents and contracts with contractors and supervising firms. Thereafter, ensure that these contractors and firms comply and require their subcontractors to comply with the E&S specifications in their respective contracts. Provide the Bank with copies of all relevant contracts with contractors, subcontractors, and supervision firms.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation and provide copies of relevant contracts to the Bank upon request.	OMSAR through PIU
1.3	TECHNICAL ASSISTANCE Ensure all consultancies, studies, capacity building, training, and any other technical assistance activities adhere to terms of reference acceptable to the Bank and align with the ESSs.	Throughout Project implementation.	OMSAR through PIU
1.4	ASSOCIATED FACILITIES If Associated Facilities are identified during project implementation, require their operators to implement activities in compliance with the applicable requirements of this ESCP and the ESSs. This includes, inter alia, the ESMP, contractor management, and SEP.	Throughout Project implementation.	OMSAR through PIU
1.5	USE OF BORROWER'S ENVIRONMENTAL AND SOCIAL FRAMEWORK The use of part of the Borrower's E&S Framework is proposed to manage the Project's labor-related risks and impacts.	Throughout Project implementation.	OMSAR through PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	USE OF BORROWER'S LABOR FRAMEWORK Ensure labor management and working conditions for Project workers comply with this ESCP and the Borrower's labor framework. This framework includes, inter alia, the country's relevant policy, legal, and institutional framework covering national, departmental, and local implementing bodies, as well as applicable laws, regulations, procedures, and implementation capacity. Promptly notify the Bank of any changes to the Borrower's E&S Framework that may materially and adversely affect the Borrower's ability to manage the Project's E&S risks and impacts in accordance with the ESSs. This notification should include any immediate or planned measures to address these changes and their potential effects on the Project. If the Bank determines such changes adversely affect the Project's relevant ESHS risk management aspects, the Borrower shall agree to implement measures and actions to address them in a manner acceptable to the Bank. The ESCP shall then be updated to reflect these agreed actions.	Throughout Project implementation. Notify the Bank immediately upon becoming aware of any changes to the Borrower's E&S Framework. Any subsequent actions requested by the Bank shall be incorporated into an updated ESCP, as outlined in paragraph 4 of the introductory section of this ESCP.	OMSAR through PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism (GM) for all Project workers, in accordance with ESS2. The GM shall provide a confidential and anonymous reporting channel for sensitive grievances, including harassment, separate from regular management communication lines. This mechanism will be accessible to all Project workers, including civil servants assigned to the Project, direct hires, and contracted personnel.	Establish the workers' GM prior to engaging Project workers and thereafter maintain its operation throughout Project implementation.	OMSAR through PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures into the Request for Proposal (RFP) for contractors. This RFP shall require that all newly procured hardware and IT equipment comply with energy efficiency standards and internationally recognized environmental and sustainability best practices.	Throughout Project implementation.	OMSAR through PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the site-specific ESMPs prepared under Action 1 above.	Measures shall be maintained and managed throughout Project implementation.	OMSAR through PIU
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage community-specific risks and impacts arising from Project activities under Action 1.1, including those related to SEA/SH, and incorporate mitigation measures into the site-specific ESMPs.	Measures shall be maintained and managed throughout Project implementation.	OMSAR through PIU
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Adopt and implement a SEP for the Project, consistent with ESS10. The SEP shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and ensure culturally appropriate consultation that is free of manipulation, interference, coercion, discrimination, and intimidation.	Adopt the SEP no later than 30 days after the Effective Date and implement it throughout Project implementation.	OMSAR through PIU
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible Project GM to promptly and effectively resolve concerns and grievances. This mechanism will operate transparently, be culturally appropriate, readily accessible to all Project-affected parties at no cost and without retribution, and allow for anonymous submissions, all consistent with ESS10.	A Project's GM shall be established before Project activities commence and shall be maintained throughout Project implementation and operation, as described in the SEP.	OMSAR through PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The GM shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, in a safe, confidential, and survivor-centered manner.		
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: • Recruitment of the E&S specialist as per Action A • Operationalization of the workers' GM as per Action 2.2 • Operationalization of the project's GM as per Action 10.2.			