



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 09/04/2021 | Report No: ESRSC02262



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Lebanon	MIDDLE EAST AND NORTH AFRICA	P176778	
Project Name	Supporting Lebanon's COVID-19 Vaccination for Refugees and Host Communities		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Health, Nutrition & Population	Investment Project Financing		11/1/2021
Borrower(s)	Implementing Agency(ies)		
Lebanese Red Cross	Lebanese Red Cross		

Proposed Development Objective

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>3.00</b>

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

**D. Environmental and Social Overview**

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

This project aims at proposing and executing a series of interventions intended at understanding and addressing the gaps in COVID-19 vaccine preparedness and implementation and COVID-19 response in Lebanon for vulnerable populations including both host and refugee communities. These objectives will be achieved by the Lebanese Red



Cross who will address three main focus areas and with distinct activities related to the following components: 1) Vaccine Awareness and registration; 2) Vaccine deployment which involves setting and management of vaccination sites (mobile and fixed), and; 3) COVID-19 Response that involves improving access to testing and treatment of COVID-19 for the target populations. The project interventions will be implemented across the country. Specifically for component 2, the vaccination sites will be located predominantly next to high-density populations of refugees and vulnerable Lebanese host communities. These sites have not been selected at this time and will be determined during the implementation phase.

**D. 2. Borrower’s Institutional Capacity**

The Lebanese Red Cross (LRC) will be the implementing agency for this project and will subcontract the Palestine Red Crescent Branch in Lebanon (PRCS-Lebanon) which is complementing the work of the LRC in the Palestinian camps and is currently managing 5 hospitals that provide COVID-19 treatment, including ICUs. The LRC is a strong local actor and auxiliary to the Lebanese authorities in the humanitarian field, and a major health service provider across Lebanon. From 2020, LRC has been mandated with specific responsibilities in the response to COVID-19 as a sole transport provider for COVID-19 patients and suspected cases. The envisaged activities of the LRC are focused on providing primary and pre-hospital health care. The LRC will procure the services of the PRCS-Lebanon which is experienced in providing secondary health services (for the Palestinian population, Syrian refugees, and Lebanese vulnerable communities).

This is LRC's first World Bank operation under the ESF. LRC has not previously worked under the World Bank's safeguards policies and has limited experience in implementing the ESF. . The LRC has assigned the E&S focal points who will be responsible for the preparation of the relevant E&S instruments for this RETF, and who will also follow up on the implementation, monitoring, and documentation of the E&S instruments throughout the project life-cycle as per the provisions of the ESCP. The World Bank team has informed the LRC team about the ESF requirements and standards that apply under this project and strongly recommended strengthening the capacity of the E&S Focal Points through the recruitment of full-time and dedicated E&S consultants with experience and skills to support the preparation and implementation of the E&S instruments.

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**II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)** Substantial

**Environmental Risk Rating** Moderate

Overall, the project will have positive impacts by: (1) improve overall registration of refugee and host community populations in Lebanon, including community consultations and mobilization, active community outreach, logistic support, and media campaigns to increase awareness, and boost registration (2) Vaccine deployment which will finance activities including establishment and management of vaccination sites for refugees and host communities (fixed and mobile), logistic support for vulnerable and high-risk beneficiaries to the vaccination sites and supplies for vaccinations, and (3) finance activities to improve access to testing and treatment of COVID-19 for the target population, including strengthening of medical centers, improved detection capacity, logistic support and increased availability of front-line personnel. However, the project’s environmental risk has been determined to be moderate under the ESF, responding to potential environmental risks and impacts stemming from interventions under the



activities of component 2 and these include (i) the Occupational Health and Safety issues related to testing and handling of supplies during vaccination or those whose support the vaccination roll out which might be in contact with Covid-19, but not detected; (ii) the logistical challenges in transporting vaccines across the host communities in a timely manner, adhering to the recommended temperature and transportation requirements; (iii) production and management of medical healthcare waste although it will be small quantities since there will be one vaccinated site (fixed) and some mobile clinics; (iv) community health and safety issues related to unforeseen effects of vaccination, traffic/road safety risks associated with transporting vaccines as well as with handling, transportation and disposal of hazardous and infectious healthcare waste. Other risks/impacts might result from other project activities as a result of conducting the campaigns both on-site and virtually to increase the public awareness about the project, and these risks/impacts include mainly health and safety hazards related to COVID-19, road accidents, solid waste both domestic and e-waste resulting from using different materials in campaigns and technical support.

**Social Risk Rating**

Substantial

Overall, the project will result in positive social impacts because it aims to: 1) Improve registration for COVID-19 vaccination among refugee and host community populations in Lebanon; 2) Increase access to COVID-19 vaccination among refugee and host community populations in Lebanon in line with the National Deployment and Vaccination Plan; 3) Improve the COVID-19 response for refugee and host community populations in Lebanon. However, project interventions may involve the following social risks: 1) increasing mistrust because of potential perception of exclusion amongst refugee groups and host communities; 2) exclusion of some intended beneficiaries because of inaccessibility at some of the vaccination sites (whether mobile or fixed) to vulnerable groups including the elderly and persons with disabilities; 3) rising social tensions between refugees and host communities during the vaccination campaigns and registration; 4) weak grievance mechanism which is not able to capture and address concerns in a timely manner resulting in potential reputational risk to the project; 5) the institutional capacity of LRC who has no previous experience with the ESF is also considered to be a potential risk in the successful implementation of the project. Based on the initial screening results, the social risk is rated as "substantial".

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**B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

**B.1. General Assessment**

**ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

**Overview of the relevance of the Standard for the Project:**

This standard is relevant. The LRC project interventions are expected to produce positive environmental and social impacts as they seek to support the Ministry of Public Health (MOPH) in Lebanon in the rollout of COVID-19 vaccines and related health services especially for refugees and host community populations in line with the NDVP. However, project activities also present moderate environmental, social, health, and safety risks for the project workforce and communities.

Given the nature of how the disease spreads, the medical requirements and resources needed to address the issue, healthcare workers, community members, beneficiaries of the Project, and the environment are likely to be exposed to risks from medical, solid, and liquid wastes generated from the health facilities (if not properly treated and managed) and the interaction among the potential COVID-19 cases and the general public. From a social perspective, it is expected that the project interventions may result in rising social tensions due to misperceptions of exclusion,



potential risk of inaccessibility to the vaccination sites (mobile and fixed) by certain vulnerable groups and especially those persons with disabilities, and potential for inadequately functioning project grievance mechanism and ineffective stakeholder engagement which may result in increased social tensions amongst refugee groups and host communities. To manage these risks and under ESS1, the LRC project management team will prepare an Environmental and Social Management Framework (ESMF) which will include procedures relevant to the development of the components including the screening and assessment of associated environmental and social risks and impacts and identification of pertinent mitigation measures and plans. Mitigation measures will be mainly based on relevant WHO guidance, World Bank Group EHS Guidelines and other good international industry practices (GIIP), ensuring inclusive stakeholder engagements, adequately functioning project-level grievance mechanism and transparency and clear communication throughout the project life-cycle. The Bank's Environmental and Social Management Framework for COVID-19 Response template will be used as the basis for the ESMF. The ESMF will include measures for screening for infection prevention and healthcare waste management;

To achieve the above-mentioned positive environmental and social impacts, the aforementioned areas of risks must be addressed and mitigated as discussed below: Medical Waste Management and Disposal. Medical, solid and liquid wastes need to be treated as per accepted standards for which an Infection Control and Waste Management Plan (ICWMP) will be prepared for the project interventions, as a part of the ESMF. Wastes that may be generated from vaccine deployment such as infected materials (water used; lab solutions and reagents, syringes, facemasks, gloves, gowns etc.) require special handling and awareness, as they may pose an infectious risk to healthcare workers in contact with the waste. Informal disposal of such waste may lead to the contamination of soil and groundwater, and, more importantly, to the further spreading of the virus in nearby communities. In order to mitigate the risks associated with medical waste management and disposal, the Project will invest in the procurement of appropriate waste management infrastructure, including containers, PPE, disinfection equipment, and others to ensure compliance with the Infection Control and Waste Management Plan (ICWMP), WHO guidance and GIIP. This will be documented in the ESMF in the ICWMP for both fixed and mobile services given that mobile clinics may require a special collection and disposal system which should be described in the ICWMP.

The Project is not expected to fund any civil works. The Environmental and Social focal points assigned by the LRC will monitor these activities. The ESMF will be prepared to a standard acceptable to the World Bank and disclosed on the LRC website and on the World Bank website before project appraisal. According to ESS1, the Borrower will engage with stakeholders as an integral part of the Project's environmental and social assessment and project design and stakeholder engagement will continue through implementation.

**Worker Health and Safety.** Workers in healthcare facilities are particularly vulnerable to contagions like COVID-19. Healthcare-associated infections due to inadequate adherence to occupational health and safety standards can lead to illness and death among health and laboratory workers. The ICWMP will contain detailed procedures, based on WHO guidance, for protocols necessary for testing, administering vaccines, and handling medical waste as well as environmental health and safety guidelines for staff, including the necessary personal protective equipment (PPEs). Proper disposal of sharps, disinfectant protocols, and regular testing of healthcare workers will be included.

**Community Health and Safety.** All project activities ranging from the deployment of vaccines to community engagement activities present a risk of transmission in the community. The operation of health facilities have a high potential of carrying micro-organisms that can infect the community at large if they are not properly managed and



controlled. The Project’s ESMF will outline procedures for each project activity commensurate to the risk. The ICWMP being developed will contain detailed procedures, based on WHO guidance, for the operation of health facilities. Institutional capacity. Monitoring and evaluation M&E measures will be put in place (via field visits, site observation, real-time tracking of key indicators). The International Federation of Red Cross IFRC is the third party monitoring agency in the National Vaccination Plan through the WB loan. MoPH works closely with LRC, as a key health provider in Lebanon. LRC is a member of the National COVID-19 Committee and the National Vaccination Committee.

The LRC will prepare the Environmental and Social Commitment Plan (ESCP) as a requirement of the legal agreement that will ensure project compliance with the Environmental and Social Standards and the World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines.

**Areas where “Use of Borrower Framework” is being considered:**

There are no areas where the use of the Borrower Framework is being considered; the project will apply the ESF.

**ESS10 Stakeholder Engagement and Information Disclosure**

The borrower needs to clearly communicate the project activities to all affected parties, including i) project-affected parties (PAPs) who might be positively and adversely affected by the project, ii) other interested parties, and vulnerable groups, through meaningful and inclusive consultation sessions during project preparation as well as active stakeholder engagements throughout the project implementation. PAPs and vulnerable populations who will be positively affected include among others: 1) refugee populations residing currently in Lebanon; 2) Lebanese host community populations; Other interested parties may include relevant local or international NGOs representative of these vulnerable groups, and those providing humanitarian aid including medical supplies. Academic institutions, also categorized as other interested parties, may also be interested in the interventions of the project activities. Persons who may be negatively affected may include those who may be excluded from the project benefits including among others, vulnerable groups such as persons with disabilities, elderly, poor host communities and refugees, and women groups. Active and inclusive engagement with all stakeholders throughout the project life-cycle will be essential to minimize to the extent possible potential social tensions and misperceptions of exclusion.

Stakeholder engagement activities will serve as a platform for all affected persons and other interested parties to engage in discussions about the project preparation and implementation activities. Due to current nationwide general mobility restrictions, virtual inclusive consultations could be another acceptable modality to be adopted by the LRC as per the guidelines of the WB technical note in this regard. The IA needs to clearly communicate the project activities to all affected parties through meaningful and inclusive consultation sessions during project preparation as well as active stakeholder engagements throughout the project implementation.

Stakeholder engagement requirements will be documented in the Stakeholder Engagement Plan (SEP), which will be prepared by appraisal. As part of the SEP, the IA also needs to introduce a feedback mechanism through the development of a functional and robust grievance mechanism (GM) that should be accessible to all. The dedicated staff of the client IA will need to monitor closely and address all grievances including anonymous complaints. This project GM will help close the feedback loop on all citizens' and beneficiaries' concerns and questions about the project activities and will allow for transparency. It is recommended that the client IA ensures that the assigned E&S

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specialists follow up closely on this aspect throughout project implementation and to document accordingly. The GM will also include referral pathways in the event of any sexual exploitation and abuse and sexual harassment (SEA/SH) related complaints with the adoption of the principles of confidentiality and anonymity.

## **B.2. Specific Risks and Impacts**

**A brief description of the potential environmental and social risks and impacts relevant to the Project.**

### **ESS2 Labor and Working Conditions**

This standard is relevant. The project will involve direct workers, contracted workers and primary supply workers. The direct workers will be the project management unit (PMU), including namely the staff at the LRC. The contracted workers include the PRCS-Lebanon staff who will be following on the day-to-day activities of the project interventions which include Vaccine awareness and registration, operation of a mass vaccination site following the request of the Ministry of Public Health and as part of the National COVID Vaccination campaign and COVID19 response. The primary supply workers will be those workers who provide directly to the project goods or materials essential for the core functions of the project.

The identified project workers may be exposed to some occupational health and safety risks due to the direct exposure to COVID19 contagion. Other Occupational Health and Safety issues are related to testing and handling of supplies during vaccination or those who support the vaccination roll out but might be in contact with Covid-19 and not detected. Workers in healthcare facilities are particularly vulnerable to contagions like COVID-19. Healthcare-associated infections due to inadequate adherence to occupational health and safety standards can lead to illness and death among health and laboratory workers. The Infection Control and Waste Management Plan (ICWMP) which will be prepared for the project interventions, as a part of the ESMF, will contain detailed procedures, based on WHO guidance, for protocols necessary for testing, administering vaccines and handling medical waste as well as environmental health and safety guidelines for staff, including the necessary personal protective equipments (PPEs). Proper disposal of sharps, disinfectant protocols, and regular testing of healthcare workers will be included.

Occupational health and safety (OHS) requirements for project workers are set out in ESS2.

Labor-Management Procedures (LMP) will be prepared as part of the LRC IA ESMF to align with ESS2 requirements on OHS requirements, health, and medication insurance arrangements, non-discrimination, prevention of child labor, and GRM . The LMP will cover labor and working conditions and terms and conditions of work for the project workers. The LMP integrated within the ESMF will be cleared by the bank and disclosed by project appraisal. The LMP, which is a living document, can be updated throughout project implementation as needed.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

This standard is relevant. Pollution prevention and management, specifically medical waste management will be of particular importance under the Project. Medical waste generated from vaccination fixed and mobile centers to be supported by the project will likely include contaminated wastes and infected materials (e.g. blood and other body



fluids, wastewater, reagents, vaccines, syringes, sharps, PPE equipment, etc.) that would require special handling and disposal, as they may pose risks to healthcare workers in contact with these wastes, general public and those of the specialized waste disposal companies. Informal disposal may lead to contamination of soil and groundwater, and more importantly, to further spreading of the virus to nearby communities. Lebanon generally lacks adequate solid waste disposal infrastructure and has few facilities for permanent disposal of medical waste. While on-site separation and collection of medical waste is mostly well-organized, its final disposal is a challenge, especially in rural areas. In order to mitigate the risks associated with on-site management of medical waste, its transportation and disposal, the project will invest in the purchase of medical equipment to neutralize COVID-19 associated waste (autoclaves, shredders and needle incinerators). Furthermore, the ESMF will include an Infection Control and Waste Management Plan (ICWMP), which will include specific requirements for waste management practices employed under the project for the supported health facilities. At a minimum, the ICWMP will cover: (a) anticipated waste composition and quantity; (b) existing medical, solid, and liquid waste management system, including deviation and gaps from the relevant EHSs, GIIP, WHO guidelines, and other protocols; (c) existing regulatory framework and supervision/monitoring arrangements; (d) plan for using the existing medical, solid and liquid waste management system, including any measures to upgrade or remedy identified gaps and deviations; and (e) arrangements for supervision and monitoring of waste management. The PMU will ensure the execution of the ICWMP throughout the project implementation period. Furthermore, the “cold chain” storage, handling, and transportation of the vaccines also require adhering to stringent health and safety standards and practices to minimize associated risks and pollutions. The ESMF will describe measures for safe cold chain temperature monitoring during power outages and emergency preparedness and response (EPR) measures.

#### ESS4 Community Health and Safety

This standard is relevant. An ESMF will be prepared for this project with the necessary measures to reduce the health and safety risks on the community during the entire work period, and all the other measures needed to keep communities safe during the vaccination procedures. The E&S Instruments will make use of general and sector-specific Environment, Health, and Safety Guidelines (EHSs) in relation to community health and safety. It will be ensured that all health workers do not expose communities to any hazardous materials or substances that may be used in the project. For potential traffic-related risks with mobile healthcare services, a road safety assessment will be carried out, with the environmental and social assessments and effective arrangements and measures put in place to deal with emergency situations. The LRC will also ensure that the concept of universal access is applied to all project interventions to provide unimpeded access to people of all ages and abilities in different situations and under various circumstances. No security personnel has been contemplated for the execution of this project, beyond the regular security arrangements by the MoPH in vaccination sites.

The preliminary SEA/SH risk assessment showed a moderate-risk rating, hence the project will prepare a SEA/SH Prevention and Response Plan and will adopt mitigation measures including the signing of codes of conduct by all project actors, awareness-raising, and a GRM sensitive to SEA/SH complaints with referral pathways and the principles of confidentiality and anonymity and a survivor-centric approach.

Given the scale of the vaccination program, there is a risk for possible adverse side effects following immunization (AEFI). Since the beginning of the COVID-19 spread in Lebanon in February 2020, the LRC was among the first local actors to respond to the outbreak and has been a member of the National COVID-19 committee. Accordingly, the





LRC has set six strategic objectives for COVID- 19 response that will help them to respond COVID-19 related health issues including AEFI. These strategies include medical coordination, transport, awareness, shelter, basic assistance, maintenance. Moreover, the LRC will lead monitoring and tracking program for side-effects of vaccine following WHO recommendations. Reporting on adverse effects that will track the immunization status of a person on an individual level will be done through different mechanisms including the GRM channel.

The E&S instrument will assess all the above-mentioned risks/impacts and mitigate them through the E&S management plan to be included in the contracts.

**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

This standard is not relevant. No investments will be supported that require the involuntary taking of land resulting in temporary or permanent resettlement impacts.

**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

This standard is not relevant. The Project is not expected to support any greenfield construction works or other activities that might jeopardize the integrity of biodiversity or living natural resources.

**ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

ESS7 is not currently relevant as there are no traditional communities meeting the criteria of this standard.

**ESS8 Cultural Heritage**

ESS8 is not currently relevant. The project is not expected to support any construction or rehabilitation activities outside of the current footprint of existing facilities that could have an impact on tangible or intangible cultural heritage.

**ESS9 Financial Intermediaries**

ESS9 is not currently relevant. There are no financial intermediaries involved in the project.

**C. Legal Operational Policies that Apply**

<b>OP 7.50 Projects on International Waterways</b>	No
<b>OP 7.60 Projects in Disputed Areas</b>	No

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

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**A. Is a common approach being considered?**

No

**Financing Partners**

The common approach is not being considered

**B. Proposed Measures, Actions and Timing (Borrower’s commitments)**

**Actions to be completed prior to Bank Board Approval:**

The Implementing Agency LRC will prepare and disclose the following instruments prior to appraisal:

- 1) Stakeholder Engagement Plan (SEP)
- 2) ESMF integrated with Labor Management Procedures (LMP)
- 4) ICWMP as a part of the ESMF
- 3) Environmental and Social Commitment Plan (ESCP)

**Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**

- 1) Recruitment of E&S consultants with experience and skills to support the LRC E&S focal points in preparation and implementation of the E&S instruments.
- 2) Implement SEP and update if necessary;
- 3) Implement LMP and update if necessary;
- 4) Prepare SEA/SH prevention and response plan that should be finalized and disclosed before the start of project activities;
- 5) Delivering ESS-related training programs to the relevant staff as required, including front-line implementers.

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**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

Borrower: Lebanese Red Cross

**Implementing Agency(ies)**

Implementing Agency: Lebanese Red Cross

**V. FOR MORE INFORMATION CONTACT**



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## VI. APPROVAL

Task Team Leader(s):	Ronald Eduardo Gomez Suarez
Practice Manager (ENR/Social)	Pia Peeters Recommended on 01-Sep-2021 at 10:15:28 GMT-04:00