

A large circular graphic with a gradient from light green at the top to blue at the bottom. Inside the circle is a photograph of a person in a white protective suit and mask working in a waste management site. The background of the cover is a light green gradient with a horizontal band of the same photograph.

Beirut Critical Environment Recovery, Restoration & Waste Management Program (P176635)

Labor Management Procedures

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Acronyms and Abbreviations

CDW	Construction and Demolition Waste
CoC	Codes of Conduct
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EHSGs	Environmental, Health and Safety Guidelines
ESCP	Environmental and Social Commitment Plan
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GIIP	Good International Industry Practice
GM	Grievance Mechanism
ILO	International Labor Organization
ISWM	Integrated Solid Waste Management
LMP	Labor Management Procedures
MoE	Ministry of Environment
NGO	Non-governmental Organization
OHS	Occupational Health and Safety
PMU	Project Management Unit
PoB	Port of Beirut
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
UNDP	United Nations Development Programme

1. Overview of Labor Use on the Project

Under the World Bank Environmental and Social Standards 2 (ESS2), on Labor and Working Conditions Labor Management Procedures (LMP) are required to be produced. The purpose of the LMP is to facilitate planning and implementation of the project. The LMP identify the main labor requirements and risks associated with the project, and help determine the resources necessary to address project labor issues. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

The project aims at responding to urgent and critical environmental issues arising out of the PoB explosion on August 4, 2020, and minimizing/mitigating public health and environmental risks. The interventions, more specifically designed towards the management and disposal of demolition waste generated from the damaged buildings and asbestos contaminated waste, rehabilitation of damaged solid waste infrastructure and technical assistance measures for their sustainable operation.

In addition to the Project Management Unit (PMU) staff who will be recruited on a part-time or full-time basis throughout the Project duration, it is estimated that around 70 workers (contracted through third parties) will be employed for implementing various Project subprojects. These workers will be local and international migrants above the age of 18. Worker distribution by activity, type, skill level and location can be found in Table 1-1. As for Primary supply workers, defined as those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project, none have been identified at this stage. However, should any be identified at a later stage during Project implementation, this LMP should be updated accordingly.

Table 1-1: Estimated Project Workers

Activity	Type of Worker	Estimated Number	Type / Characteristics*	Skill Level	Location
Project Management (PMU)	Direct	6	Supervisory Consulting / M/F, national	Skilled	Bakalian site
Subcomponent 1.1 Management of asbestos-contaminated debris generated in the explosion affected areas of Beirut					
Management of asbestos contaminated debris on site	Contracted	5	Supervisory Consulting, M/F, national	Skilled	Bakalian site
Identification and preparation of disposal site for asbestos contaminated Construction and Demolition Waste (CDW)	Contracted	15	Supervisory Consulting M/F, national Manual M, national and international migrant Transportation (drivers) M, national	Skilled & unskilled	Quarry site

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Activity	Type of Worker	Estimated Number	Type / Characteristics*	Skill Level	Location
Recycling of uncontaminated CDW	Contracted	20	Supervisory M/F, national Manual M/F, national and international migrant Transportation (drivers) M, national	Unskilled & skilled	To be decided
Sub-component 1.2 Rehabilitation of severely damaged solid waste management facilities serving Beirut area					
Assessment and rehabilitation of damaged solid waste management facilities	-	0	-	-	-
Rehabilitation process for the damaged waste management facilities	Contracted	20	Supervisory M/F, national Manual M, international migrant	Unskilled & skilled	Facilities of Karantina or Coral
Develop a detailed rehabilitation and operational plan for Karantina and Coral facilities	-	0	-	-	-
Implementation of demonstration pilot(s) on integrated solid waste management (ISWM)	Contracted	10	Supervisory M/F, national Manual M/F, national and international migrant	Unskilled and skilled	Beirut
Technical assistance for capacity development and public awareness	-	0	-	-	-

*M: Male, F: Female

2. Assessment of Key Potential Labor Risks

2.1 Project Activities

Project activities that will involve workers are described in this section. These include activities that will be undertaken in the field or the office.

Component 1. Rehabilitation of damaged solid waste management infrastructure and management of asbestos-contaminated debris generated due to PoB explosion (USD 8 million)

Subcomponent 1.1 Management of asbestos-contaminated debris generated in the explosion affected areas of Beirut (USD 2 million)

Activities include:

- ***Management of asbestos-contaminated debris on site that includes:***
 - Testing and management activities to separate asbestos contaminated (including more than 0.1 percent asbestos) from uncontaminated CDW where feasible.
 - Management of the asbestos contaminated fraction and preparing for transport from the site for safe disposal.
- ***Identification and preparation of disposal site for asbestos contaminated CDW that includes:***
 - Preparation of a selected site to receive asbestos contaminated CDW or preparation the long-term safe containment of these materials at the Bakalian site based on best environmental practice (depending on securing a disposal site).
 - Transportation and management of materials.
- ***Recycling of uncontaminated CDW in construction sector, pending approval of quarry site or other such sites.***

Sub-component 1.2 Rehabilitation of severely damaged solid waste management facilities serving Beirut area (USD 5.4 million)

Activities include:

- Development of a detailed rehabilitation and operational plan for Karantina and Coral facilities.
- Restoration and rehabilitation of operations at one or both of the facilities.

Sub-component 1.3 Piloting ISWM in the selected explosion impacted areas of Beirut (US\$0.60 million)

- Implementation of demonstration pilot(s) on ISWM in the selected area(s) explosion impacted areas of Beirut through recycling, reuse, and composting. The pilot will be implemented by specialized non-governmental organizations (NGOs)/agencies selected through competitive bidding process.

Component 2. Policy and institutional support for greening Beirut's Reconstruction Agenda (USD 0.5 million)

Sub-component 2.1. Establishment of a collaborative platform for stakeholders' engagement and planning priority actions for greening Beirut's reconstruction agenda (USD 0.3 million)

Activities include:

- Developing a communication and outreach plan through appropriate stakeholders' mapping and relevant tools for building trust among the concerned entities.
- Identification and prioritization of strategic and sustainable activities aiming at greening the reconstruction agenda of Beirut city and which will be based on specific action plans to respond to priority issues.

Sub-component 2.2. Strengthening monitoring and enforcement for the management of critical hazardous and chemical substances (USD 0.2 million)

Activities include:

- Environmental monitoring conducted as part of the environmental and social safeguard activities of the project.
- Development of an appropriate mechanism that may be used for possible future clean-up and remediation operations.

Component 3. Project Management (US\$ 1.5 million)

This component supports project management activities to be carried out by UNDP as an intermediary agency. A Project Management Unit (PMU) will be established by UNDP for this purpose.

2.2 Key Labor Risks

The main labor risks identified in this Project are associated with Component 1 (Rehabilitation of Damaged Solid Waste Management Infrastructure and Management of Asbestos-contaminated Debris). These include:

- Disturbance of asbestos contaminated waste such as demolition work, rubble moving operations and heavy vehicular movements over contaminated waste is likely to expose operatives undertaking this work, and those in close proximity (within 20m) to the management site. Inhalation of dust, gaseous substance or aerosols from removal and transportation of asbestos material can cause serious health risks to workers.
- Occupational accidents and injuries to workers from several management activities (use of crushers and other machinery and equipment)
- Working conditions, such as excessive work hours, delayed or inadequate payment of wages and insufficient insurance coverage
- Health risks related to exposure to waste for collection, sorting, recycling and composting workers
- Accidents during removal, transportation and disposal of asbestos-contaminated waste.
- Discrimination of unequal employment opportunities likely incidents of child labour or forced labor

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- Risks of labour influx and potential occurrence of gender-based violence and sexual exploitation and abuse/sexual harassment (SEA/SH) incidents
- Risks of exposure to COVID-19 contagion
- General understanding and implementation of occupation health and safety requirements
- Inadequate Grievance Mechanism (GM) to handle complaints and concerns for all the Project Workers.

3. Brief Overview of Labor Legislation: Terms and Conditions

Employment in Lebanon is governed by the Labor Law (the Lebanese Labor Code), the Social Security Law and the individual employment contract. Table 3-1 presents key legislations governing employment in Lebanon that are relevant to the Project.

Table 3-1: Key Employment Legislation

Year	Law / Decree / Decision	Title	Relevant Provisions
Employment Conditions			
1946	Labor Law	The Lebanese Labor Code	<p>Terms and Conditions of Employment:</p> <p>Article 31: Forty-eight hours are the maximum duration of work per week. This is in line with ESS2.</p> <p>Article 34: Whenever the duration of work exceeds six non-stop hours for men and five non-stop hours for women, the employer should allow them in the middle of the day, a resting time which is not to be under one hour. This is in line with ESS2.</p> <p>Article 36: All employees are to be granted a weekly rest which must not be under thirty-six unbroken hours. This is in line with ESS2.</p> <p>Article 38: All employees whose father, mother, spouse, children, grandchildren or ascendants have died are entitled to two-day holiday with full pay. This is in line with ESS2.</p> <p>Article 39: Every employee in an establishment for at least once a year is entitled to an annual leave of fifteen days with full pay. This is in line with ESS2.</p>
2012	Decree 7426	Minimum Wage	Sets the minimum wage at 675,000 LBP/month or 30,000 LBP/day
Child Labour and Minimum Age			
2012	Decree 8987	Prohibition of employment of minors under the age of 18 in work that may harm their health, safety or morals	Restricts the employment of minors under the age of 18 in activities and works that can be harmful to their health and that can limit their education.
Sexual Harassment			
2020	Law 205	Anti-sexual Harassment Law	Targets all types of sexual harassment, in any setting, and especially in the workplace such that perpetrators can be sentenced to up to two years in prison and fined up to 20 times the value of the minimum wage.
Non-Discrimination and Equal Opportunities			

Year	Law / Decree / Decision	Title	Relevant Provisions
1946	Labor Law	The Lebanese Labor Code	<p>Article 26: The employer may not discriminate between working men and working women with regard to type of work, amount of wage or salary, employment, promotion, professional qualification and apparel. This is in line with ESS2.</p> <p>Article 28: Women working in all categories, mentioned in the present law are entitled to a delivery holiday of seven weeks, comprising the period before and the period after delivery, on presentation of a medical certificate stating the presumed date of delivery. 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 in the course of the said period. This is in line with ESS2.</p> <p>Article 29: The wage or salary shall be paid in full during delivery holiday. This is in line with ESS2.</p>
2021	MOL Decision 96/1	Businesses, professions, trades, and jobs restricted to Lebanese only	<p>Restricts significant number of jobs to Lebanese only and allows Syrians to occupy jobs that are not restricted to Lebanese especially in the construction sector. This decision exempts Palestinians born in Lebanese territories and officially registered with the Ministry of Interior and Municipalities.</p>

In addition, Lebanon has adopted the following International Labor Organization (ILO) core labor standards:

- C138 - Minimum Age Convention (Minimum age specified: 14 years), 2003
- C182 - Worst Forms of Child Labour Convention, 2001
- C029 - Forced Labour Convention, 1977
- C098 - Right to Organise and Collective Bargaining Convention, 1977
- C100 - Equal Remuneration Convention, 1977
- C111 - Discrimination (Employment and Occupation) Convention, 1977
- C105 - Abolition of Forced Labour Convention, 1977

Although many of the labour legislation in Lebanon are in line with ESS2, gaps still exist and been identified are as follows:

- Exclusion of certain nationalities and jobs (such as construction workers and other manual work) from the protections under the Labour Code.
- No statutory requirements exist for developing a Grievance Mechanism (GM) within the workplace.
- Although Article 26 of the Labor Law prohibits employers to discriminate against employees on the basis of gender regarding the nature of the work, the amount of the salary, the hiring, the promotion, clothing etc., the Law itself does not permit the recruitment of women in certain tasks and sectors. In addition, MoL Decision 96/1 for

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2021 restricts a significant number of jobs to Lebanese only, with some exceptions to Palestinians born in Lebanon.

4. Brief Overview of Labor Legislation: Occupational Health and Safety

The main legislative tool governing occupational health and safety in Lebanon is Decree 11802/2004 on Occupational prevention, safety, and health in all enterprises subject to the Code of Labour. This decree provides the general regulations for the prevention of occupational hazards and accidents, and the promotion of health and safety in all industrial establishments subject to the Labour Law. The Decree comprises the following chapters:

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

The said states that the employer shall:

- 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 din, 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.
- 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.
- 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.
- Provide workers with sufficient and appropriate information on the risks related to their work.

Article 61 of the Lebanese Labor Law provides that institutions that fall within the scope of the said Law must always be clean and meet the necessary health and rest requirements for employees. The institution should be equipped to ensure the safety of the employees. Mechanical machinery, parts, mobility devices, tools must be considered in their installation and preservation with the best possible safety conditions.

It is important to note that the Project will ensure that the World Health Organization (WHO) COVID19 safety measures (<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>) and the national requirements announced and published on COVID-19 preventive measures are adhered to by all project workers indicated in this LMP throughout project implementation. These measures include but are not limited to: avoiding crowded areas and social gatherings, keeping safe social distancing measures not less than 1 m, and wearing masks. Updates on COVID-19 safe social distancing and wearing of masks as well as others can be found on the Ministry of Public Health webpage (www.moph.gov.lb).

5. Responsible Staff

The Project will employ Direct Workers for the PMU, which will be in charge of the Project's overall implementation and coordination between the Project stakeholders. It will ensure that the Project is implemented in accordance with the Project documents. It will organize national meetings and workshops, conduct priority awareness and communication activities and oversee the implementation of the environmental and social (E&S) related instruments including the Project's Stakeholder Engagement Plan. It will also be responsible for monitoring and evaluation.

The UNDP is committed as per the Environmental and Social Commitment Plan (ESCP) to assign dedicated staff, including an Environmental Specialist and a full-time Social/Gender Specialist. They shall be responsible for the following:

- Monitoring of labor and working conditions for all Project workers;
- Supervising the reception, registration and correct processing of any complaints/grievances received from the identified Project workers under this project including those associated with SEA/SH complaints;
- Monitoring the occupational health and safety (OHS) issues and performance across all sites and activities of the Project;
- Ensuring awareness of all types of workers on the main content and objectives of the LMP;
- Preparation and review of relevant contract clauses for contractors including on prevention and control of SEA/SH;
- Monitoring the implementation of subproject-specific Contractor's Environmental and Social Management Plans (ESMPs);
- Ensuring Project implementation in line with UNDP and World Bank requirements and national legislations by reviewing Contractor's Environmental, Health and Safety (EHS) reports and conducting site visits where required;
- Reporting on monitoring of the implementation of the C-ESMPs and EHS performance to the Project Manager;
- Coordinating and leading awareness campaigns and capacity building activities as specified in Section 8.1.4;
- Coordinating with contractors/implementers on C-ESMP requirements;
- Execute any sanctions as a result of possible non-compliance with OHS requirements,
- Facilitate periodic inspections, and/or spot checks of work sites and/or of labor management records and reports conducted by the PMU and/or third parties
- Ensuring signing of codes of conduct by all identified project workers.

The contractor/implementer of each subproject/activity will have to comply with the requirements of ESS2 which will be incorporated into contractual agreements. The contractor/implementer shall pass the requirements to all subcontractors. The following represent a non-exhaustive list of their responsibilities under this LMP:

- For all subprojects for which an ESMP has been prepared, bank cleared and disclosed, the contractor/implementer shall prepare a site-specific ESMP or Construction ESMP that includes an Occupational Health and Safety Plan addressing all hazards and risks to workers
- Facilitate and accept sharing and disclosure of information

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- Implement COVID-19 specific measures according to contractual agreements
- Signing codes of conduct of all contracted workers
- Widely and effectively disseminating the site-specific GM and documenting in a GM log
- Addressing grievances raised by their workers
- Ensuring an age verification mechanism is in place
- Conducting regular awareness raising and training sessions on OHS and SEA/SH
- Regular (monthly reporting) on all E&S associated activities

6. Policies and Procedures

The Project's identified risks and impacts will be mitigated a number of policies and procedures. These will address OHS risks, working conditions and management of worker relationships, labor working conditions, non-discrimination and equal opportunities, terms and conditions of employment. The different policies and procedure which the Project will prepare, adopt and implement are listed below.

6.1 Occupational Health & Safety

All contractors/implementers involved with the Project (Component 1 in specific) shall prepare, adopt and implement an OHS plan complying with national legal requirements, the relevant ESMP (if available), General World Bank Environmental, Health and Safety Guidelines (EHSGs) and, as appropriate the industry-specific EHSGs as well as other Good International Industry Practice (GIIP). This will be reflected in the requirements for the different Project activities, clear and specific clauses in the contracts as well as in all ToRs developed for the Project throughout the implementation period. The OHS plan shall be approved by the PMU prior to the start of the relevant activities. In line with the relevant ESMP, the OHS plan to be developed by the different parties shall cover the following:

- Identification of all potential hazards affecting the physical, mental and social well-being of project workers in all occupations and perform risk assessment for all identified hazards.
- Elimination of risks where possible through management measures or engineering control.
- Provision of appropriate measures to prevent and protect against the potential hazards, including modifying, substituting, or eliminating the hazard sources. These include adequate personal protective equipment (PPE) at no cost to project workers; adequate first aid facilities; hazard labelling in both Arabic and English languages.
- Developing and implementing an Emergency Prevention and Preparedness and Response arrangements to emergency situations.
- Provision of remedies for adverse impacts such as occupational injuries, deaths, disability and disease.
- Putting in place processes which enable project workers to report work situations that they believe are not safe or healthy.
- All contractors/implementers shall hire a full-time accredited OHS professionals at each of the sites. Records shall be kept and shared with the PMU on OHS performance at all sites, and all work-related accidents, illnesses, and all other incidents will be formally reported and documented.
- Contractor/implementers shall also develop specific procedures or plans so that adequate precautions are in place to prevent or minimize an outbreak of COVID-19, and it is clear what should be done if a worker gets sick. These measures include but are not limited to:
 - Assessing the characteristics of the workforce, including those with underlying health issues or who may be otherwise at risk.
 - Confirming workers are fit for work, to include temperature testing and refusing entry to sick workers
 - Considering ways to minimize entry/exit to site or the workplace, and limiting contact between workers and the community/general public

- Training workers on hygiene and other preventative measures, and implementing a communication strategy for regular updates on COVID-19 related issues and the status of affected workers
- Treatment of workers who are or should be self-isolating and/or are displaying symptoms
- Assessing risks to continuity of supplies of medicine, water, fuel, food and PPE
- Adjustments to work practices, to reduce the number of workers and increase social distancing
- Expanding health facilities on-site compared to usual levels, developing relationships with local health care facilities and organize for the treatment of sick workers
- Establishing a procedure to follow if a worker becomes sick (following World Health Organization guidelines)
- Implementing a communication strategy with the community, community leaders and local government in relation to COVID-19 issues on the site.

Within 48 hours after becoming aware of the occurrence of an incident or accident, UNDP shall submit a report to the World Bank on the incident or accident and provide sufficient details regarding the incident or accident, findings of the Root Cause Analysis, indicating immediate measures taken or that are planned to be taken to address it, compensation paid by responsible contractor, and any information provided by any contractor and supervising entity/consultant, as appropriate. Ensure the incident report is in line with the Bank's Environment and Social Incidence Response Toolkit. A detailed incident/accident report shall be provided within 10 business days of the initiation notification to the Bank, as requested.

6.2 Labor Influx

It is likely that impacts related to labor influx will be relevant in the project candidate areas. Temporary Labor Influx might result in unfavorable impacts on the target areas in terms of:

- Influx of additional population;
- Increased risk of communicable diseases and burden on local health services;
- Increased risk of illicit behavior and crime;
- Potential and Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).

As per the WB 2016 Labor Influx Guidance Note, the scale of labor influx indicates the significance of the anticipated risk of SEA/SH. The Project will adopt mitigation measures including requirements for the contractors to develop and sign a code of conduct (CoC). It will include prevention of sexual exploitation and abuse and sexual harassment (SEA/SH) at workplace, and accommodation of workers in the case of presence with local communities. A SEA/SH Prevention and Response Plan will be prepared upon Project commencement to address these issues.

In addition to that, the following will be thoroughly implemented:

- Apply the full requirements related to operating the project grievance mechanism including anonymous channels;
- Raising awareness of the local community about the Project commitment towards communities and the measures taken for that through public consultation and focus group discussions.

7. Age of Employment

The minimum age for employment on the project is 18 due to the hazardous nature of the work in particular under Component 1. All workers will have written contracts compliant with the national labor law and receive pre job briefing of their rights under the national law, including wages, pay, overtime etc.

In order to prevent engagement of under-aged labor, all contracts with work contractors shall have contractual provisions to comply with the minimum age requirements including penalties for noncompliance, and it will be well communicated to all potential stakeholders including the local community where the unskilled workforce will be sourced. The contractor/implementer is required to maintain labor registry of all contracted workers with age information. Verification of the age shall be undertaken prior to the engagement of labor and be documented. Below is indicative age verification means that could be used in the context where official ID system is unavailable:

- Check the birthday on official documents such as birth certificate, national ID or other credible records, where available;
- Obtain written and signed declaration from the worker; or
- Inquire with the local community leader, community action group or with other credible community sources.

8. Terms and Conditions

Direct workers. The terms and conditions for direct workers in the PMU will be governed by the standard UNDP Consultancy. All Direct Workers will be provided with clear and understandable terms and conditions of employment through a written contract.

Contracted workers. The Lebanese Labour Code presented in Chapter 3 (Overview of Labour Legislation) above is the guiding legislation on employment terms and conditions for contracted workers. Clauses will be included in all Project procurement documents to ensure that terms and conditions of employment are being provided according to the requirements of ESS2 and/or national law (whichever is more stringent). A written individual contract of employment shall be provided to workers that specify the following: (a) name of workers; (b) address, occupation, age and sex of workers; (c) employer's name and address; (d) nature and duration of contract; (e) hours and place of work; (f) remuneration payable to the worker; (g) procedure for suspension or termination of contract including receiving written notices of termination; (h) leave entitlements. The contract should also include disciplinary procedures that are applicable, housing and accommodation provisions and allowance where applicable, food and payment, overtime compensation, benefits as stated in the national law as well as those arising from the requirements of ESS2. Depending on the origin of the employer and the employee, employment terms and conditions will be communicated in a language that is understandable to both parties. In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.

The Project is expected to deal with contracted workers who may not be capable of reading and/or may have difficulties understanding the employment documentation. The project will therefore ensure that working conditions and terms of employment are orally communicated and explained. For the migrant workers, who are also expected as part of the Contracted workers, the project will ensure that the working conditions and terms of employment are the same or substantially equivalent to those of non-migrant workers (when performing the same type of work).

Other Provisions. Maternity leave, annual leave, and sick leave, follow the Lebanese Labor law. The rest days per week are considered Saturday and Sunday, which maybe be altered shall the function deem necessary.

The ongoing labor relations will be governed by the Lebanese Laws and especially the Labor Code and the Social Security Law.

8.1.1 Wages and Working Hours

Minimum Wage. As the mechanism to set the official minimum wage is prescribed by the State does not currently reflect living wages, the fair market rate will be identified for each job type and applied for Project workers.

Hours of Work. The normal hour of work of a project worker shall not exceed 48 a week. Hours worked in excess of the normal hours of work shall abide by Labor Code conditions and entitle a worker to a proportionate increase in remuneration. Working hours during the month of Ramadan will be determined each year by management. However, Ramadan working hours shall not exceed Seven (7) hours a day.

Monitoring Wages and Working Hours. Monitoring systems will be put in place to ensure that all types of Project workers will be properly paid on a regular basis and compensated for longer working hours and certain shifts which may need to be paid at a higher hourly rate as per applicable legislation (e.g. night shifts). Workers will be presented with details of grievance procedures, including the person to whom grievances should be addressed (refer to Section 9 for details about the workers' grievance mechanism which will be adopted).

Forced Labor. Forced labor, refers to any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. These practices will be prohibited and will not be used in connection with the project. This prohibition covers any kind of involuntary or compulsory labor. If forced labor is discovered in the Project's workforce, prompt action will be taken to address the practice that has coerced the worker and not recreate conditions of coercion. Any cases of forced labor discovered in the Project's workforce are referred to relevant government authorities and support services, as appropriate, to be addressed in accordance with national law. These may include bonded labor (work in satisfaction of a debt of an amount that would be difficult or impossible to pay off), excessive limitations on freedom of movement, excessive notice periods, retaining the worker's identity and other government-issued documents (such as passports) or personal belongings, imposition of recruitment or employment fees payable by the worker at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work on a non-voluntary basis.

8.1.2 Freedom of Association and Collective Bargaining

The rights of workers and the role of unions will be respected and the right to enter free and voluntary collective bargaining arrangements with management is respected.

8.1.3 Equal Opportunity and Non-Discrimination

As previously mentioned, the project will implement GIIP relating to labor standards and working conditions (in line with ILO Core Conventions) and national law. This particularly applies to equal opportunities and non-discrimination. The employment of Project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship including but not limited to: recruitment requirements; training opportunities; termination of employment; inappropriate treatment or harassment including sexual harassment. Where disabled persons are hired, accessibility will be ensured in terms of provision of wheelchair ramps or elevators, or alternative formats of communication, etc.).

Men and women will be given equal opportunities relating to all recruitment opportunities under the Project. This will apply to hiring of all Project workers. The workforce GM will be communicated to all workers as detailed in section 9 and will be used for noncompliance monitoring.

The project will also provide all measures necessary for protecting vulnerable groups of workers such as the disabled, women and migrant workers. As mentioned above, the CoC will be developed which should also include provisions on SEA/SH and safety.

8.1.4 Training and Capacity Building

Training will be provided to all workers on general (and specific) OHS during induction and on a regular basis to ensure all workers are well capacitated with the project's OHS requirements. The PMU's Environmental Specialist and Social/Gender Specialist will provide training to Direct Workers, while training will be provided to Contracted Workers through Third Parties. Training will include but will not be limited to: work at heights; electrical and vehicular safety; handling of hazardous materials, use of PPE, hazard avoidance and reduction measures, use of first aid and rescue techniques, emergency prevention and preparedness and response arrangements to emergency situations, and firefighting.

Additional training sessions for different targeted workers will include the following:

- Awareness of the requirements of this LMP and associated plans/procedures;
- Code of conduct and SEA/SH;
- Grievance mechanism, including roles, responsibilities and accountabilities, and contact persons/communication channels.
- E&S instruments as relevant including the implementation of the different ESMPs.

Training for contracted workers shall be delivered by experienced trainers, based on the competency requirements. Records of the training will be kept including training evaluation.

9. Grievance Mechanism

A well-communicated and easily accessible GM will be provided for all Direct and Contracted Project Workers to raise workplace concerns related to recruitment process and/or working environment and conditions. Such workers will be informed of the GM at the time of recruitment and the measures put in place to protect them against reprisal for its use. The GM focal point will be the Social/Gender Specialist at the PMU and will be responsible for managing direct workers' grievances, and in the event of any complaints by the contracted workers under the Project, they will report directly to the internal GM established for the project. The Social/Gender Specialist will also coordinate with all the organizations and stakeholders, compile and ensure follow up and monitoring of the grievances as well as other commitments as per the provision of the ESCP.

The workplace GM will be designed to be easily understandable, clear, and transparent and to provide timely feedback. The policy of confidentiality and non-retribution will be reinforced, along with ability to raise anonymous grievances. The mechanism will include multiple communication channels dedicated for workplace complaints only, including but not limited to an email address/website link; phone number; and a physical address for handling the complaints and grievances in person. These will be provided in an updated version of the LMP once the GM is established. Workers will have the freedom to pick the one they are comfortable using. The workplace GM will not impede access to other judicial or administrative remedies that are available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

The PMU will be responsible to set up this workplace GM. Adequate resources should be allocated for the workers GM to function effectively. The mandate for the GM, institutional arrangements, procedure for receiving complaints, time limits for redressal of complaints and escalation level for unresolved cases and resolution will be finalized with the start of project implementation. The workplace GM will also be responsible for tracking and resolving worker grievances and maintain records about grievances/complaints received, recommendations and resolutions made and notice of resolution of grievance to the complainant. In addition, the GM will be sensitive to complaints related to SEA/SH grievances and ensure implementation of the necessary referral pathways.

Within the context of COVID-19, the nature of complaints will be particularly time-sensitive and sensitive in terms of confidentiality. Hence, the GM should consider streamlined procedures to address specific worker grievances, which would allow workers to quickly report labor issues, lack of proper procedures or unreasonable overtime, and allow the workers to freely report, respond and take necessary actions. All grievances will be clearly documented in a GM log (sample in the Annex).

Procedure

Workers will be encouraged to discuss their grievances and complaints informally with their direct managers. However, all complaints need to be documented for record keeping, tracking, monitoring. In cases where the direct manager is related to the subject of the complaint, the employee may choose to directly submit a formal grievance. For all cases where employees decide to submit a formal grievance, the following provide details about the step-by-step procedures they will be using.

1- Receipt, Acknowledgment and Registration

- The worker will submit the grievance through one of the dedicated channels.
- The worker will be requested to use to the extent possible a grievance template which will be shared with all workers in hard/soft copies /available to download from the website.
- If the worker wishes to submit the grievance orally via phone or in person, the GM coordinator will lodge the complaint on their behalf, and it will be processed through the same channels.
- Under request of the person submitting the complaint, grievances can be lodged anonymously. This option shall be made clear to the complainant in the Grievance template and/or in cases of oral submissions.
- The complainant has the right to appeal the decision if it is not satisfactory. This right should be made clear to them.
- In case of anonymity opt-out, the worker will provide contact details or any other suitable means for him/her to be updated on the status of their complaints/grievances.
- All received grievances shall be logged into the workplace grievance log.
- In all cases, the GM coordinator should provide timely communication with the complainants, informing them that their grievance has been received, will be logged and reviewed for eligibility and provide them with the registration number. Clear and announced standards for the time frame of the response should be established, announced and adhered to.

2- Grievance Verification and Assessment

In order to verify the grievance as needed, it should be discussed with the worker, investigated and evidence gathered to the extent possible. This should include field inspections if needed in order to conduct interviews and gather information about the incident or the case.

The Social/Gender Specialist (who is the Project GM focal point) will need to make a decision with regards to the eligibility of the grievance or whether it should be escalated.

3- Response and Feedback

- As an initial response, the complainant will be informed with the eligibility results as well as all the steps being taken to address his concerns. This initial response shall be provided via a formal letter; an email; or a phone call within **5 working days** from the date of receipt of the grievance.
- For eligible and straightforward grievances, the GM focal point will provide a response without further investigation within 5 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- For eligible grievances that require further assessment, the GM focal point will further engage with the complainant via a phone call or a formal meeting in order to collect further information. Based on this, they will provide within 14 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- In all the scenarios, the response should include a clear explanation of the proposed response including any alternative options, while clarifying to the extent possible the rights of the complainant, and the choices he has including: 1- to agree to proceed; 2- request for a second round of assessment; 3- to consider any other organizational, judicial or non-judicial possibilities.

- In case the grievance feedback is satisfactory to the complainant, the response should be implemented and recorded in the grievance log with the date of grievance resolution.
- In case the grievance feedback is not satisfactory to the complainant, he/she has the right to appeal. In such case, a second tier should be initiated where the GM coordinator will attempt to propose alternative options and carry out additional investigation in order to meet the concerns of the complainant, and other stakeholders. The complainant will be invited to attend an appeal meeting or to discuss the appeal over a pre-scheduled phone call, during the first three days following the appeal. It will be preferred that a more senior staff attend/discuss the appeal with the employee. Where needed, a grievance committee might be established representing different sectors as relevant to the complaint, in addition to worker representative(s) (upon the complainant consent) in order to help achieve a transparent process.
- The GM coordinator should send their response within 7 days from the date of the appeal. The second-tier response should also include a clear explanation of the proposed response including all alternative options and the choices the complainant has as described above.

4- Agreement and Implementation of the Response

- If the grievance has been resolved, the GM coordinator will document the actions taken, time it took to resolve the grievance and satisfactory resolution.
- If the grievance has not been resolved, the GM coordinator should document additional information including actions taken, communication with the complainant, and the decisions made by the complainant and the organization with regards to any other alternatives.
- Confidentiality should be maintained in GM documentation, if the complainant has requested so.
- In all cases, the total number of grievances should be recorded including time it took to resolve them, as well as the number of unresolved cases.

SEA/SH-related Procedures

Workers shall ensure adherence to the CoC. The CoC commits all Project workers to acceptable standards of behavior. The CoC will be developed before the workers are hired. The CoC will include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The CoC will be written in plain and culturally appropriate language and signed by each worker to indicate that they have:

- Received a copy of the CoC as part of their contract;
- CoC has been explained to them as part of the induction process;
- Acknowledged that adherence to CoC is a mandatory condition of employment;
- Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the GM will have a different and sensitive approach to SEA/SH-related cases. Where such a case is reported, it will immediately be referred to the appropriate service providers, such as medical and psychological support, emergency accommodation, and any other necessary services. Data on SEA/SH cases will be handled confidentially and follow the victim/survivor centered approach. UNDP shall promptly notify the Bank (within 48 hours) of

any SEA/SH-related incident. UNDP shall submit a report to the World Bank on the incident and provide sufficient details regarding the incident, findings of the Root Cause Analysis, indicating immediate measures taken or that are planned to be taken to address it, compensation paid by responsible contractor, and any information provided by any contractor and supervising entity/consultant, as appropriate. The UNDP will ensure the incident report is in line with the Bank's Environment and Social Incidence Response Toolkit. A detailed incident report shall be provided within 10 business days of the initiation notification to the Bank, as requested.

10. Contractor Management

The contractors/implementers will be selected based on both minimum technical specifications and financial offers. The UNDP will make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have in place or will adopt this labor management procedures and that will allow them to operate in accordance with the requirements of ESS2.

Moreover, the UNDP will establish procedures for managing and monitoring the performance of such third parties in relation to the requirements of ESS2 and this LMP. Requirements of ESS2 will be incorporated into contractual agreements with all contractors/implementers and subcontractors together with appropriate noncompliance remedies and procedures will be put in place to manage and monitor the performance of contractors/implementers. The contractual agreements will include non-compliance remedies (i.e., sanction clause) for possible noncompliance with E&S provisions by the contractor/implementer. It is worth noting that the bidding documents will follow the UNDP standard bidding documents which disqualify contractors/implementers for failing to comply with SEA/SH-related obligations. COVID-19 specific measures shall also be incorporated into contractual agreements, including but not limited to:

- Provision of medical insurance covering treatment for COVID-19, sick pay leave for workers who either contract the virus or are required to self-isolate due to close contact with infected workers and payment in the event of death;
- Inspections /spot checks of project location/ work sites;
- Specific procedures relating to the workplace and the conduct of the work (e.g. creating at least 6 feet between workers by staging/staggering work, limiting the number of workers present);
- Specific procedures and measures dealing with specific risks. For example, for developing an OSH for workers handling solid waste or construction workers taking into account exposure risk assessment and management, developing an emergency response plan, etc.;
- Appointing a full-time OHS specialist responsible for following up and reporting on all health and safety issues at the site, in addition to a COVID-19 focal point with responsibility for monitoring and reporting on COVID-19 issues,
- Including contractual provisions and procedures for managing and monitoring the performance of contractors/implementers, in light of changes in circumstances prompted by COVID-19;
- Labor management records and reports compiled by the contractor such as: Representative samples of employment contracts and signed CoC; grievances log and their resolution; age verification records; accidents and incidents record and implementation of corrective actions; and training record provided for contracted workers.
- Provisioning of the necessary PPE to the workers.

Annex: Grievance Log

Complainant Name and Contact Details	Date of Complaint Receipt	Details and Nature of the Complaint	Corrective Actions Taken	Date of Response	Status (Closed / Ongoing / Pending)