ENVIRONMENTAL & SOCIAL MANAGEMENT FRAMEWORK (ESMF)

FOR

WEST BANK & GAZA EMERGENCY SOCIAL PROTECTION COVID-19 RESPONSE PROJECT P174078

Emergency SPJ COVID19 Response Project - Additional Financing P176199

December, 2021

TABLE OF CONTENTS

Contents

TABLE OF CONTENTS 2

ACRONYMS 4

0. Executive Summary 6

0.1 West Bank Emergency Social Protection COVID-19 Response Project **Error! Bookmark not defined.**

0.2 Justification of the ESMF 9

0.3 Institutional and Implementation Arrangements 9

0.4 Environmental and Social Risk Screening 10

0.5 Environmental and Social Monitoring 12

0.6 Public Consultations, Grievance and Disclosure 12

0.7 Capacity Building and Training for ESMF 13

CHAPTER ONE: INTRODUCTION 14

1.1 Background 14

1.2 Preparation and Use of this Framework 15

1.3 Organization of the Framework ..... **Error! Bookmark not defined.**

CHAPTER TWO: THE LEGAL FRAMEWORK 16

2.1 Palestinian Legislation Relevant to the Implementation of the Project 16

2.2 Environmental Legal Framework 16

2.2.1 The Palestinian Environmental Law 16

2.2.2 The Palestinian Environmental Assessment Policy (PEAP) 16

2.2.3 Labor Law 17

2.2.4 Occupational Health and Safety (OHS) 17

2.2.5 Labor and Occupational Health and Safety related to COVID-19 18

2.2.6 Gender and Vulnerability 18

2.3 Institutional Framework in Palestine 19

2.3.1 Environment Quality Authority 19

World Bank Environmental and Social and Environmental Framework(ESF) 19

2.4 19

2.5 ESF and Palestinian Laws and Regulations Gap Analysis 20

2.6 Environment, Health and Safety Guidelines 24

2.7 COVID-19 Considerations 24

CHAPTER THREE: ENVIRONMENTAL AND SOCIAL BASELINES 25

3.1 General 25

3.2 Baseline Environmental and Social Information 25

3.3 Economic situation in Palestine 25

3.4 Labor Markets 26

3.5 Sectorial Context 26

3.6 COVID-19 Situation 27

3.7 Gender 27

CHAPTER FOUR: SUMMARY OF THE PROJECT 28

4.1 Introduction 28

4.2 The project Components 28
4.3 Potential Subprojects 32
4.4 Project beneficiaries 32
4.4.1 Component 1 (Emergency Cash Transfer): 32
4.4.2 Component 2 (Cash for Work) ..... **Error! Bookmark not defined.**
4.4.3 Component 2 (Cash for Work) 32
4.4.4 Component 3 (Capacity Building Project Management, Monitoring and Evaluation): 33
4.4.5 Component 4 (Contingency Emergency Response): 33

CHAPTER FIVE: ENVIRONMENTAL AND SOCIAL IMPACTS 34
5.1 Positive Impacts of the project 34
5.2 Environmental and Social Risk Classification as per World Bank's ESF 34
5.3 Environment and Social Mitigation Measures 40
5.4 Gender Inclusion 46

CHAPTER SIX: PROCEDURES TO ADDRESS ENVIRONMENTAL AND SOCIAL ISSUES 47
6.1 Environmental and Social Processing Steps 47
6.2 Measures for addressing GBV, SEA/SH Risks and Impacts 48
6.3 Measures for management of Occupational Health and Safety 49
6.4 Management of E & S During CERC Component Implementation 50

CHAPTER SEVEN: STAKEHOLDER ENGAGEMENT, GRIEVANCE REDRESS MECHANISM AND INFORMATION DISCLOSURE 51
7.1 Consultation and Disclosure 51
7.2 Grievance Redress Mechanism 53

CHAPTER EIGHT: INSTITUTIONAL ARRANGEMENTS, RESPONSIBILITIES AND CAPACITY BUILDING REQUIREMENTS 56
8.1 Institutional Arrangement and Responsibilities 56
8.1.1 Responsibilities of the MoF-PCU 57
8.1.2 Responsibilities of the Ministry of Labor under Subcomponent 1.1 and Component 4 57
8.1.3 Responsibilities of the MoSD under Subcomponent 1.1, 1.2 and Component 4 57
8.1.4 Responsibilities of the PFESP under Component 2 57
8.2 Institutional arrangements for implementation of the ESMF 58
8.3 Roles and Responsibility of World Bank 60
8.4 Capacity building requirements for Implementation of ESF 60
8.5 Budget and Resources for Implementation of ESF 61

ANNEXES 1
Annex 1: Guidance Note for public work under COVID-19 context 1
Annex 2: Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings 7
Annex 3: Sample Code of Conduct (CoC) ..... **Error! Bookmark not defined.**

ACRONYMS

C4W	Cash for Work
CEDAW	Convention on the Elimination of All Forms of Discrimination
CERC	Contingent Emergency Response Component
CTP	Cash Transfer Program
EA	Environment Assessment
EHSG	Environment, Health and Safety Guidelines
EQA	Environmental Quality Authority
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESO	Environmental and Social Officer
ESPRP	Emergency Social Protection COVID-19 Response Project
ESSs	Environmental and Social Standards
FAO	Food and Agriculture Organization of the United Nation
EU	European Union
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GM	Grievance Mechanism
HSS	Health and Safety Specialist
IEE	Initial Environmental Evaluation
ILS	Israeli Shekel
IPV	Intimate Partner Violence
ICWMP	Infection Control and Waste Management Plan
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MoH	Ministry of Health
MoL	Ministry of Labor
MoSD	Ministry of Social Development
MoU	Memorandum of Understanding
NGOs	Non-Governmental Organizations
OHS	Occupational Health and Safety
PA	Palestinian Authority
PAD	Project Appraisal Document
PCBS	Palestinian Central Bureau of Statistics
PEAP	Palestinian Environmental Assessment Policy
PEL	Palestinian Environmental Law
PCU	Project Coordination Unit
PFESP	Palestinian Fund for Employment and Social Protection
PMP	Pest Management Plan
PPE	Personal Protective Equipment
SEA	Sexual Exploitation and Abuse

SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SNN	Social Safety Net
SSNRP	Social Safety Net Reform Project
TTL	Task Team Leader
WBG	World Bank Group
WHO	World Health Organization

0. Executive Summary

0.1 West bank & Gaza Emergency Protection COVID-19 Response Project

West bank & Gaza Emergency Protection COVID-19 Response Project to be implemented by the Ministry of Finance (MoF) through Project Coordination Unit (PCU), the Ministry of Labor (MoL), Ministry of Social Development (MoSD) and the Palestinian Fund for Employment and Social Protection for Labors (PFESP). The original project development objective (PDO) is to provide cash support and short-term employment opportunities to vulnerable populations in West Bank, affected by COVID-19. The proposed AF, along with a restructuring of the parent project will scale up the impact of the Parent Project and expand its geographical coverage to include the Gaza Strip "poor people registered as CTP and affected by the last war".; the new Project Development Objective (PDO) PDO is: "*to provide cash support and short-term employment opportunities to vulnerable populations in the West Bank and Gaza affected by Emergency shocks including COVID.* The project will seek to produce concrete and tangible results for the Palestinians through (a) mitigate household income shock for the poor and newly poor, (b) mitigate household income shock for workers affected by COVID-19 and Gaza War, (c) address healthcare challenges, and (d) improve institutional resilience to shocks. To achieve the Project Development Objectives (PDO), the parent project is articulated around four components:

a. Component 1: Emergency Cash Transfers in the West Bank (US$18.36 million)
   This component will finance a one-time cash transfer to poor households and those households vulnerable to poverty affected by COVID-19 in the West Bank. The emergency cash transfer program aims to reach two groups of at-risk households: (i) applicants for the new COVID-19 relief support launched by the MoSD, MoL, and the MoLG, and (ii) poor households already registered in the MoSD's CTP system. Therefore, this component will include two sub-components: Subcomponent 1.1. Emergency Cash Transfer to households vulnerable to poverty and Subcomponent 1.2: Financing of the CTP-funding gap

b. Component 2: Cash for Work in the West Bank (C4W) (US$8 million)
   This component will finance short temporary employment opportunities for approximately 3,060 beneficiaries (of which at least 1,530 will be women), building on the delivery model developed for Gaza. This component will provide Cash for Work sub-grants to selected NGOs to implement C4W subprojects employing the targeted vulnerable populations. Supported subprojects will focus on health and other social services provided by NGOs to vulnerable groups affected by COVID-19, but also include economic livelihoods initiatives to assist vulnerable populations in the recovery from the crisis. Services to support economic livelihoods will mainly be in the area of agricultural activities but other types of activities could also be considered. Health services include clinics and other health services, including support to people with disabilities and elderly populations. Other social services in which beneficiaries will be employed will be as teachers in the education sector, as social workers providing psychosocial support, as workers to support women who have been victims of gender-based violence (GBV), and as providers of child services.

c. Component 3: Capacity Building Project Management, Monitoring and Evaluation (US$2 million)

This component will ensure that the PCU housed at the Ministry of Finance and the technical entities working directly with the PCU will be operational and will implement the project in conformity with the Legal Agreement, the PAD, and the project's Operations Manual. It will support the PCU, the MoSD, the MoL, and the PFESP

d. Component 4: Contingency Emergency Response (CERC)

This component will contribute to providing an immediate and effective response in case there is an eligible crisis or emergency. This component would draw from uncommitted funds under the other components of the project. In the event that the CERC is activated, the restructuring of the project would need to occur within three months after activation.

Status of ESMF implementation of the Parent Project

The MoF met delays in completing the environmental and social requirements included in the parent project's Environmental and Social Commitment Plan (ESCP) including clearance and disclosure of the Environmental and Social Management Framework (ESMF) and Labor Management Procedures (LMP). Until April 2021, MoF has already disbursed US$ 12.4 million (US$ 11.2 million under component I and US$ 1.2 million under componemt IV) as part of the cash transfers for vulnerable households who are benefiting from Cash Transfer Program (CTP). No activities have been conducted under component II and III except procuring and installation of few computers under component III which are not part of this audit consultancy. In line with ESF requirements, MoF was therefore requested to conduct an environmental and social audit of the already disbursed activities (under Components 1 and 4) with the requirements identified in the environmental and social instruments and the ESCP. MoF recruited an Environmental and Social Officer (ESO) and Health and Safety Specialist (HSS) in December 2020, since then, MoF has updated, consulted and disclosed the ESMF on the MoF website. MoF has put effective management arrangements for the C4W component into place. MoF has already provided guidance to the beneficiary NGOs in preparing the environmental and social screening reports and the site-specific ESMPs. Several consultation workshops have been held with the beneficiary NGOs and relevant stakeholders on the preparation of the ESMPs, including the preparation of the Pestiside Management Plan, the Infection Management and Waste Management Plan, the establishing of a fucntioning GRM with GBV/SEA/SH related complaints tools and the dissemination of Code of Conduct. Further consultations are planned during project (parent and AF) implementation. The screening reports are in the review phase by the ESF team.

Rationale for Additional Financing and Restructuring

At the time of the parent project preparation, the pandemic was at its peak in the West Bank; however, the situation drastically changed during implementation. After project effectiveness, Gaza was significantly impacted and cases due to the COVID-19 started surging. According to latest figures, there are over 346,245 confirmed registered cases and 3,877 related deaths. The Palestinian Authority (PA) has recently declared its high concern over a fourth wave of the pandemic, more specifically of the Delta variant. The outbreak has further aggravated the situation already affected by the continued blockade, access and movement restrictions, internal divide and decline in donor aid. As such, the PA requested the World Bank to activate the Contingent Emergency Response Component (CERC) of the parent project to expand the Emergency Cash Transfer component to Gaza and cover 16,000 affected households through the allocation of uncommitted funds amounting to US$3.28 million. Based on the economic and social impacts of COVID-19, the Recipient has noted the urgent need to support two groups that have been significantly impacted by the pandemic; (a)

a waiting list of Gazan households registered in the Cash Transfer Program (CTP) but who have not received cash assistance to date; and (b) new poor households that have emerged as a result of the pandemic. Selected CERC beneficiaries will receive a one-time cash payment of NIS 700 (US$ 217) to cover their basic needs and avoid falling deeper into poverty.

In June 2021, following the May 2021 Gaza conflict, the World Bank Group in collaboration with the European Union (EU) and United Nations (UN) published the Gaza Rapid Damage and Needs Assessment[1] (RDNA). The RDNA is a broad-based assessment that identifies the impact of the conflict and resulting priority reconstruction and recovery needs of critically affected sectors leading to the development of a reconstruction plan. The assessment considered the social protection and inclusion dimensions to ensure that citizens are engaged throughout the process including the recovery stage. According to the RDNA findings, the sector that has been most impacted by the conflict is the Social Sector comprised of housing, health, education and social protection and jobs. The RDNA highlights the importance of delivering direct assistance and strengthening systems that deliver public and social services in the areas of social protection, health care, education among others.

In order to address the emergency in Gaza and West Bank, Ministry of Finance (MoF) has requested that the project needs additional financing and to be restructured, and unutilized funds be reallocated to finance activities in Gaza. The proposed AF is largely driven by the PA's urgent need for assistance to respond to the COVID-19 recovery and resilience efforts in West Bank and Gaza as well as to the worsening socio-economic conditions in Gaza. The scope of the additional financing and restructuring is described below.

Proposed Changes under the Additional Financing and Restructuring

The proposed restructuring and AF of the parent project will finance the costs associated with the scaling up of project activities. Activities to be supported are summarized below:

Component 1: Emergency Cash Transfers to the West Bank (US$2,433,366). The restructuring will allow the expansion of cash transfers to the Gaza Strip; thus, the Component will be adjusted to read: "**Emergency Cash Transfers to the West Bank and Gaza**".

Sub-component 1.1: Emergency Cash Transfers to households vulnerable to poverty, including those affected by the pandemic in both the West Bank and Gaza and households that have been pushed further into poverty due to the worsening economic conditions in Gaza.
Sub-component 1.2: Financing of the CTP-funding gap. Given the continued fiscal constraints of the PA, the AF will contribute to bridging the financing gap of the upcoming CTP quarterly payment. This will help in reaching out to registered CTP households in both the West Bank and Gaza.

Component 2: Cash for Work in the West Bank (C4W). This component will be expanded to reach additional beneficiaries in the West Bank. It will provide sub-grants to selected NGOs to implement C4W sub-projects employing targeted vulnerable populations, through temporary employment aimed to address health and social needs.

Component 3: Capacity Building Project Management, Monitoring and Evaluation. No AF resources will be

[1] https://documents1.worldbank.org/curated/en/178021624889455367/pdf/Gaza-Rapid-Damage-and-Needs-Assessment.pdf

allocated to this component.

Component 4: Contingency Emergency Response Component (CERC). This component will remain available for rapid response in the event of an emergency, subject to a request from the MoF.

0.2 Justification of the ESMF

The Environmental and Social Management Framework (ESMF) is prepared in compliance with national requirements as well as the objectives of the Bank's Environmental and Social Framework (ESF). ESMF approach is selected because the Project consists of series of activities, and the risks and impacts cannot be determined until the subproject details have been identified.

The ESMF is to improve decision-making and ensure that environmental and social effects of activities and interventions are well mitigated. Specifically, the following are the objectives of the ESMF:

- To guide the Project activity to comply with the national regulations and the World Bank's Environmental and Social Framework (ESF);
- To establish clear directives and methodologies for the environmental and social screening and scoping of activities within the framework of the project;
- To guide the project partners to identify and assess the potential environmental and social risks and impacts of the project and propose mitigation and monitoring measures to be implemented by environmental and social expert.
- The ESMF also helps to ensure environment and social due diligence, if the Contingency Emergency Response Component (CERC) is activated; though the ESMF includes a negative list (Annex 7), the ESMF may also have to be updated depending on the scope of the activities included in the CERC component.

0.3 Institutional and Implementation Arrangements

The MoF will act as the formal Project Counterpart (PC) to the project and as the overall implementing entity through its Project Coordination Unit (PCU), together with the MoL and the MoSD for Component 1 and the MoL/PFESP for Component 2. For component 1, MoL will be responsible for defining the eligibility criteria for the selection of beneficiaries, running program communications, and finalizing the beneficiary list. This will be discussed and agreed upon with the project partners – MoSD and MoF. Implementation of Component 2 will be handled by selected NGOs based on the selection criteria for both NGOs and beneficiaries as described in the Project Operation Manual (POM) prepared by MoF; after selecting the NGOs, the MoF will sign sub-project grant agreements, in which the PFESP will be identified as the Project Technical Unit (PTU). In addition, there will be separate service provider contracts generated for other activities to be undertaken under the project, namely for the management and capacity building, Component 3.

The PCU recruited on Dec 27, 2020 an Environment and Social Officer who will be responsible for implementing all steps and mitigation measures presented in the ESMF, the LMP and the SEP. The ESO will conduct regular on-site monitoring of works to verify adherence to the requirements set out. The ESO will also be responsible for monitoring and reporting on compliance of the environmental and social issues. In addition, the ESO is expected to create awareness among all implementing partners on environmental and

social compliance, and any training necessary for its effective implementation. MoF has also hired a Health and Safety Specialist (HSS) on Feb 21, 2021 who will be responsible for preparing, monitoring and reporting the OHS requirements throughout the project implementation.

Other related Palestinian ministries and authorities, contractors/suppliers and NGOs), who are to be involved by the project components will be coordinated by the PCU. The MoL, MoSD and PFESP whom are the partners in development and implementation of project components to share their responsibilities and commitment.

Project partners according to projects components are:

1. Ministry of Labor under Subcomponent 1.1 and Component 4
2. Ministry of social Development under Subcomponent 1.1, 1.2 and Component 4
3. Responsibilities of the PFESP under Component 2

Chapter 8 presents the detailed responsibilities and institutional arrangement foreseen for the project and present these in schemata (**Figure 1**).

0.4 Environmental and Social Risk Impacts and Mitigation Measures

The environmental and social risks are rated 'Substantial'

The risks and mitigation measures summarized below are the same for the Parent Project, the additional financing and restructuring.

The World Bank's Environmental and Social Standards relevant to the project are; ESS1 on Assessment and Management of Environmental and Social Risks and Impacts, ESS2 on Labor and Working Conditions, ESS3 on Resource and Efficiency, Pollution Prevention and Management, ESS4 on Community Health and Safety, and ESS10 on Stakeholder Engagement and Information Disclosure. The other five ESSs (ESS5, ESS6, ESS7, ESS8, and ESS9) are not relevant to the project.

The project will provide cash support to individuals who have lost their jobs or income sources as a result of the COVID-19 pandemic and Gaza War (component 1); cash for Work sub-grants to selected NGOs to implement C4W subprojects employing the targeted vulnerable populations (component 2); and capacity building for PCU housed at the Ministry of Finance and the technical entities working directly with the PCU will be operational and will implement the project in conformity with the Legal Agreement, the PAD, and the Project Operations Manual (POM) (component 3). The project will neither support the procurement of any materials or equipment, except for few numbers of computers (under component 3 for PCU, MoSD, MoL and PFESP), nor rehabilitation or construction activities or civil works. Negative impacts might occur from activities during the project implementation including: (i) generation of solid waste from residual of small civil works for installation of computers; (ii) nuisance related to vibration and noise during installation activities; (iii) occupational health and safety hazards for the workforce related to the work of selected beneficiaries in subprojects/activities such as agricultural sector, clinics, working with disabled children in schools, early childhood support, food distribution to the most needy and primary healthcare services, and assistance to the elderly and to those with preconditions that make them more susceptible to the COVID-19

pandemic; and (iv) labor risks such as overtime, unpaid salary in part or in full, minimum age and child labor risks, rights of association are not in accordance with the requirements of national law and ESS2 are possible.

The use of pesticide and hazardous chemicals such as preservatives by NGOs/contracted workers, and handling of solid, hazardous, and medical waste from the support to health services under Component 2 can have a significant impact on the environment and human health. labor risks related to working conditions such as overtime, unpaid salary in part or in full, minimum age and child labor risks, rights of association are not in accordance with the requirements of national law and ESS2 are possible.

The social risks can be summarized as: (i) risks of elite capture, especially with regard to component 1.1 that targets vulnerable groups; (ii) risks associated with poor targeting and social exclusion based on gender, disability and other forms of vulnerability under component 1 and 2; (iii) community health and safety risks due to exposure to communicable diseases, including COVID-19, and adverse impacts on community members due to handling of hazardous medical waste material and pesticides; potential exposure of vulnerable groups, including youth, children and women to violence, sexual exploitation and abuse (SEA) and sexual harassment (SH) risks in exchange for project benefits under C4W component; (iv) risks related to labor and working conditions for direct and contracted workers under C4W component such as overtime, unpaid salary in part or in full, minimum age and child labor risks and rights of association are not in accordance with the requirements of national law and ESS2 are possible,; and (v) limited experience of the ESO to manage social risks in accordance with ESF requirements/ESCP commitments. Social risks will be addressed and mitigated both through the project design (particularly the risks of exclusion and elite capture) and measures included in the project's E&S instruments to address and manage social impacts.

Management of environmental and social (E&S) risks and impacts also include the preparation and implementations of the project's E&S instruments. The Environmental and Social Commitment Plan (ESCP) includes the requirement for recruitment of an Environmental and Social Officer (ESO), as well as a Health and Safety Specialist (HSS) by the PCU to provide support for the project's overall environmental and social aspects. The Environmental and Social Management Framework (ESMF) includes measures related to COVID-19 prevention as per the WHO guidance and outlines the implementation arrangement to be put in place for environmental and social risk management, training programs, as well as compliance monitoring and reporting requirements. Labor Management Procedures (LMP) outline the management of risks associated with occupational health and safety and issues related to different categories of workers involved in the project. Stakeholder engagement, communications and outreach activities are outlined in the Project's Stakeholder Engagement Plan (SEP). Finally, commitment to implement the E&S measures is agreed to between the World Bank and The Palestine Liberation Organization (for the benefit of the Palestinian Authority) in the ESCP. The likely impacts and suggested mitigation measures are presented in **Table 2 (Chapter 5)** and are detailed in this ESMF.

0.5 Environmental and Social Risk Screening

The ESMF provides a screening process to: (i) identify potential key environmental and social impacts and risks; (ii) determine appropriate environmental and social risk classification, according to ESS1; and (iii) identify mitigation and monitoring measures for activities with adverse impacts; and incorporate mitigation measures into the subprojects as appropriate. The extent of environmental work that might be required prior to the commencement of the new subprojects or enrollment of benefiting workers will depend on the outcome of the screening process described in Chapter 6.

0.6 Environmental and Social Monitoring

Environmental and social monitoring programs and indicators are required to be implemented and measured to address all activities that have potentially impacts on the environment during normal operations and upset conditions. Environmental monitoring activities are to be based on direct or indirect indicators applicable to the components of the Project.

Monitoring frequency shall be sufficient to provide representative data for the parameter being monitored. Monitoring shall be conducted by the ESO HSS at the PCU, following monitoring and record-keeping procedures. Monitoring data shall be analyzed and reviewed at regular intervals and compared with the operating criteria so that any necessary corrective actions can be taken.

0.7 Public Consultations, Grievance and Disclosure

Public consultations are critical in preparing effective and sustainable projects. This requirement supports the participatory planning process as required by the Palestinian Authority (PA) national regulations and the World Bank (ESS10). It is important that beneficiaries are involved in the project cycle, from the preparation to implementation and monitoring. The same applies to relevant stakeholders.

To fulfill the requirements of ESS10, MoF has prepared a Stakeholder Engagement Plan (SEP). The purpose of the SEP is to explain how stakeholder engagement will be practiced throughout the project life cycle and which methods will be used as part of the process; as well as to outline the responsibilities of MoF in the implementation of stakeholder engagement activities. The project SEP is updated to reflect the required updates related to additional financing and project restructuring.

MoF-PCU conducted consultation with relevant stakeholders for parent project and under Additional financing and project restructuring in September 2021 and have been reflected in the updated SEP.

The project has two grievance mechanisms. One for labor-related grievances and the other for project related grievances. The project GM was established in each partner Ministry/Agency (MoF, MoSD & MoL and PSESP, and information about the GM has been disseminated to affected parties during consultations. The GM also includes features to accept and address potential SEA/SH related complaints, including referral mechanisms.

The labor GM will be established in each selected NGO to restore dignity and empower beneficiaries, discourage corruption and sexual abuse, increase transparency, and ensure adherence to “Do No Harm Principle”. Detail description for the project and labor GM is provided in the SEP and LMP. MoF, MoL, MoSD and PFESP will disclose on their websites all project information and all key documentation, including ESMF, LMP and SEP to allow stakeholders to understand the risks and impacts of the project, and potential opportunities.

0.8 Capacity Building and Training for ESMF

Effective implementation of the ESMF will require adequate capacity enhancement for the Project implementing entities; mainly PCU team including the ESO and HSS at MoF and other involved ministries and stakeholders, mainly MoL, MoSD and PFESP. This is covered by **sections 8.5** of this ESMF. The indicative budget associated with implementing the ESF and monitoring of environmental and social risks associated with the project is estimated at 239,000 USD.

CHAPTER ONE: INTRODUCTION

1.1 Background

1. The objective of this Environmental and Social Management Framework (ESMF) is to ensure that the project's activities including cash transfer to poor households and those households vulnerable to poverty affected by COVID-19 and Gaza War in the West Bank and Gaza and the short temporary employment opportunities for beneficiaries are designed and implemented in an environmentally and socially sustainable manner, taking into account Palestinian's legislation as well as the World Bank' Environmental and Social Framework (ESF).

2. The ESMF is developed by Ministry of Finance (MoF) to manage risks under the West Bank and Gaza Emergency Social Protection COVID-19 Response Project (ESPRP) called hereafter (the Project). International Bank for Reconstruction and Development/International Development Association called hereinafter (the Bank) has agreed to provide financing for the Project. Ministry of Finance is the grant recipient and project implementing agency through the project coordination unit (PCU) at MoF, in conjunction with the Ministry of Social Development (MoSD), the Ministry of Labor (MoL) and the Palestinian Fund for Employment and Social Protection (PFESP). MoF will be responsible for following up the implementation of the environmental and social considerations and mitigation measures stated in the ESMF.

3. MoF met delays in completing the environmental and social requirements included in the parent project's Environmental and Social Commitment Plan (ESCP) including clearance and disclosure of the Environmental and Social Management Framework (ESMF) and Labor Management Procedures (LMP). Until April 2021, MoF has already disbursed US$ 12.4 million (US$ 11.2 million under component I and US$ 1.2 million under componemt IV) as part of the cash transfers for vulnerable households who are benefiting from Cash Transfer Program (CTP). No activities have been conducted under component II and III except procuring and installation of few computers under component III which are not part of this audit consultancy. In line with ESF requirements, MoF was therefore requested to conduct an environmental and social audit of the already disbursed activities (under Components 1 and 4) with the requirements identified in the environmental and social instruments and the ESCP. MoF recruited an Environmental and Social Officer (ESO) and Health and Safety Specialist (HSS) in December 2020, since then, MoF has updated, consulted and disclosed the ESMF on the MoF website. MoF has put effective management arrangements for the C4W component into place. MoF has already provided guidance to the beneficiary NGOs in preparing the environmental and social screening reports and the site-specific ESMPs. Several consultation workshops have been held with the beneficiary NGOs and relevant stakeholders on the preparation of the ESMPs, including the preparation of the Pestiside Management Plan, the Infection Management and Waste Management Plan, the establishing of a fucntioning GRM with GBV/SEA/SH related complaints tools and the dissemination of Code of Conduct. Further consultations are planned during project (parent and AF) implementation. The screening reports are in the review phase by the ESF team.

4. MoF will be responsible through the environmental and social officer newly hired at MoF-PCU for implementing the procedures to address the environmental and social issues prepared in this ESMF, and ensure that compliance and monitoring of these procedures are carried out. The ESMF approach is selected because the Project consists of activities, and the risks and impacts cannot be determined until the subproject details have been identified, and therefore potential adverse environmental and social impacts cannot be precisely identified. Furthermore, Palestinian's environmental legislation

does not have provisions for the environmental and social screening of similar projects, such as cash transfer to households vulnerable to poverty, short temporary employment opportunities for beneficiaries and purchase of equipment among other activities included in the Project, whereas the World Bank's ESF requires that all projects are screened for potential adverse environmental and social impacts to determine the appropriate mitigation measures.

1.2 Preparation and Use of this Framework

5. The ESMF provides a guide to be used in accordance to Palestinian's laws and regulations for environment and social processes and the World Bank' ESF. This ESMF is prepared in consultation with the key partners where their specific concerns have been addressed.

6. The ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts. Its contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency responsible for addressing project risks and impacts, including its capacity to manage environmental and social risks and impacts. MoF who is responsible for planning, implementation and management of subprojects in conjunction with MoSD, MoL and PFESP.

CHAPTER TWO: THE LEGAL FRAMEWORK

2.1 Palestinian Legislation Relevant to the Implementation of the Project

7. The proposed Project will be implemented in compliance with applicable environmental laws and regulations. Palestine has an environmental assessment Policy that is applicable to the proposed project. In addition, a wide range of laws and regulations related to environmental and social issues are in place in Palestine. Many of these are cross-sectoral and partially related to the Project activities. This chapter presents an overview of the major national environmental laws and regulations that are relevant and may apply to activities supported by the project, and World Bank's ESF and ESSs.

2.2 Environmental Legal Framework

2.2.1 The Palestinian Environmental Law

8. The Palestinian Environmental Law (PEL) No. 7 of 1999 was developed by the Environment Quality Authority (EQA), to protect environmental resources, including land environment; air environment; water resources and aquatic environment; and natural, archaeological and historical heritage. According to the PEL, the protection of these resources shall be addressed in all social and economic development plans in view of sustainable development and protection of the rights of future generations.

9. The core issues of concern in the PEL are the protection of public health and social welfare, as well as the conservation of ecologically sensitive areas, biodiversity and rehabilitation of environmentally damaged areas. The PEL also sets penalties for violating any article presented under this law. The main objectives of the PEL include the following: (i) Protecting the environment from pollution, (ii) protecting public health and social welfare, (iii) incorporating environmental resources protection in all social and economic development plans and promoting sustainable development to protect the rights of future generations, (iv) conserving ecologically sensitive areas, protecting biodiversity, and rehabilitating environmentally damaged areas, (v) establishing inter-ministerial cooperation, (vi) promoting environmental information collection and publication, (vii) promoting public awareness, education and training.

10. Article 8 of this law reads, "The competent authorities, consistent with their respective specialization, shall encourage undertaking appropriate measures to reduce the generations of solid waste or any other hazardous waste to the lowest level possible, and to the best extent possible, shall encourage solid waste treatment, recycling or processing".

11. In accordance with Article 12, and 13, the disposal of any hazardous substance or waste should not be done, unless such a process is conformed with the terms, regulations, instructions and norms specified by EQA, in coordination with specialized agencies.

2.2.2 The Palestinian Environmental Assessment Policy (PEAP)

12. The Palestinian Environmental Assessment Policy (PEAP) was approved by decree No: 27-23/4/2000. It supports the sustainable economic and social development of the Palestinian people. Specifically, the PEAP objectives are to: (i) ensure an adequate quality of life in all aspects, and ensure that the basic needs and social, cultural, and historical values of the people are not negatively impacted as a result of development activities, (ii) preserve the capacity of the natural environment, (iii) preserve biodiversity and landscape, and promote the sustainable use of natural resources, (iv) avoid irreversible environmental damage, and minimize reversible environmental damage from development activities.

13. Under the PEAP, proponents of public and private projects are required to submit an Application for Environmental Approval that informs the EQA and relevant approving authorities of the intended project activities. Subsequently, a determination is made whether an Initial Environmental Evaluation (IEE) or a detailed Environment Assessment (EA) is required. If neither an IEE nor EA report is required, the EQA, in coordination with the EA Committee, will determine if an Environmental Approval will be granted and, if so, under what conditions.

2.2.3 Labor Law

14. The Palestinian Labor Law No. 7/2000 is applicable to the Project. The law includes provisions for occupational health and safety measures, protection of workers' rights, ensuring a safe working environment, life insurance, accidents insurances, working hours, workers' age and workers' wages. According to the law, the maximum number of hours per day that employee must perform is 8 hours; (Saturday through Thursday) and the allowed work week of 48 hours. The employment of children before they reach the age of eighteen years shall be prohibited. A more addition to Palestinian labor laws came through Ministry Council decision number 11 in October 2012 which set the minimum wage for employees in the Palestinian labor market at 1450 ILS. The law applies to both men and women, and was meant to improve conditions for workers.

2.2.4 Occupational Health and Safety (OHS)

15. Many laws, resolutions, and ministerial instructions and decisions have addressed, inter alia, issues of occupational safety and health, and suitability of the working conditions. The Palestinian Labor Law No. 7 of 2000 guarantee workers' rights to occupational safety and health at workplace, and regulate inspection of work conditions by the competent authorities, and other areas, as follows: Occupational Health and Safety Regulations Articles No. 90, 91, and 92 of the law provided that, the cabinet shall issue the regulations governing the occupational safety and health and work environment. Such regulations shall in particular provide for personal protection and prevention methods for workers from the work hazards and occupational diseases; the necessary health conditions in workplaces; first medical aid means at the establishment; and routine medical examinations of workers. The law also prohibits cutting any expenses or deductions from the workers' wages in return for the provision of occupational safety and health requirements at the workplace.

16. Following the Labor Law, several resolutions and ministerial instructions were issued detailing health conditions and standards related to occupational safety at different workplaces. These include:

- The ministerial decrees No. 15, 17, and 21 of 2003 concerning health conditions and standards at workplaces, medical assistance procedures at the workplace, and safety standards at companies.
- The Decision of the Council of Ministers No. (49) of 2004 concerning the preventive list of work hazards and career diseases and work accidents.
- Instructions by the Minister of Labor no. (1) of 2005 concerning the precautions to protect workers in construction sites.
- Instructions by the Minister of Labor no. 2-6 of 2005, defining the range of chemical exposure limits and standards, exposure to ionizing radiation, noise, and safe levels of brightness of light and temperature at the workplaces.

2.2.5 Labor and Occupational Health and Safety related to COVID-19

17. The Project will ensure the application of OHS measures as outlined in the Government of Palestine and WHO guidelines such as the procedures for protection workers in relation to infection control precautions and provision of immediate and ongoing training on the procedures to all categories of workers. Additionally, the Project will be mandating hand hygiene and personal protective equipment (PPE); ensuring adequate and free of charge supplies of PPE (particularly facemask, gowns, gloves, handwashing soap and sanitizer); and overall ensuring adequate OHS protections in accordance with the measures prescribed by Government of Palestine and the latest guidance by WHO as it develops over time and experience addressing COVID-19 globally.

2.2.6 Gender and Vulnerability

18. Amended Basic Law of 2003, the official commitment of the state of Palestine to gender equality prohibits gender-based discrimination. Moreover, there are several applicable laws that regulate social relations and role distribution.

19. The decision of the Minister of Labor No. (2) for 2013 regulates the work of domestic workers.

20. According to article 100 of Palestinian Labor Law no. 7, discrimination between men and women in the workplace is prohibited.

21. Decision by Law no. (7) for 2011 on amending the applicable Penal Code in the northern governorates and the applicable Penal Code in the southern governorates. As for Article (2), of the Decision, it provided for amending Article (18) by adding (and this does not include crimes of killing women on the pretext of “family honor”).

22. The Palestinian State is also signatory (April 2014) to the Convention on the Elimination of All Forms of Discrimination (CEDAW), addressing gender equality and women's rights. Furthermore, a number of measures and reforms have been put in place to address violence against women in Palestine, in line with the Palestinian National Strategy to Combat Violence Against Women (2011-2019).

23. The Palestinian Child Law No. 7 of 2004, which ensure protection of children's rights to survival and development and enjoy a life free, secure, sophisticated, and prevention of crimes perpetrated against children, including sexual abuse and specifies minimum age of marriage at less than 18 years.

24. The Disability Law no. 4 of 1999, enhanced the protection and rights afforded to persons with disabilities. It promotes access to a regular life, protect the rights and safety, and ensure equal opportunities without any form of discrimination for persons with disabilities.

2.3 Institutional Framework in Palestine

2.3.1 Environment Quality Authority

25. The Environment Quality Authority (EQA) is the main Authority responsible for environmental and social issues in Palestine. The Environment Quality Authority has replaced the former Ministry of Environmental Affairs (MEnA), which was established in August 1998 by a decree from the President of the Palestinian National Authority. EQA plays an important role as the planning, coordinating and executive body to improve environmental standards and attitude in the Palestine. Being the central representative authoritative body responsible for all environmental issues in the Palestine, EQA addresses all environmental constraints, including natural resource depletion and environmental pollution, as an approach towards sustainable development.

2.4 World Bank Environmental and Social and Environmental Framework(ESF)

26. The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through Bank Policies and Directives, The Environmental, Health and Safety Guidelines, and the Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity. There are ten Environmental and social standards (ESS's), these are:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts.
- ESS2: Labor and Working Conditions.
- ESS3: Resource Efficiency and Pollution Prevention and Management.
- ESS4: Community Health and Safety.
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.
- ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.
- ESS8: Cultural Heritage.
- ESS9: Financial Intermediaries.
- ESS10: Stakeholder Engagement and Information Disclosure.

For the purposes of this project, the ESS1, ESS2, ESS3, ESS4 and ESS10 are applicable. Full list and details of World Bank environmental and social standards can be found in the following link: http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-

Social-Framework.pdf.

27. In line with ESS1, MoF prepared this ESMF in relation to component 1 (cash transfer to households vulnerable to poverty affected by COVID-19 in the West Bank and Gaza and subprojects in relation to Component 2 (C4W) employing the targeted vulnerable populations which would focus on health and other social services provided by NGOs to vulnerable groups affected by COVID-19, and also include economic livelihoods initiatives to assist vulnerable populations in the recovery from the crisis. In line with ESS2 and ESS4, MoF has prepared Labor management Procedures. Also, to fulfill the requirements of ESS10, MoF has prepared stakeholder engagement plan (SEP). The SEP will be updated in March 2021 to reflect the consultations that are under preparation.

2.5 World Bank Group Environmental, Health and Safety Guidelines

28. The World Bank has several guidelines few of which are applicable to various components of the proposed project namely:

- EHS Guidelines - WASTE MANAGEMENT
- EHS Guidelines - HEALTH CARE FACILITIES
- EHS Guidelines - HAZARDOUS MATERIALS MANAGEMENT
- EHS Guidelines - CONSTRUCTION AND DECOMMISSIONING
- WBG EHS Guidelines: Waste management
- Bank's Life and Fire Safety Requirements for (new and existing) buildings accessible to the public.

2.6 ESF and Palestinian Laws and Regulations Gap Analysis

29. To ensure that the ESMF will be effectively implemented, it is important to determine whether the local legislative structure and EA policy are adequate for effective environmental and social management and whether this structure supports the World Bank's ESF and ESSs.

30. A gap analysis between the applicable World Bank's ESSs and Palestinian's National laws and Regulations has been undertaken. The analysis found that the PEL and the PEAP as written, which are the overarching framework for environmental and social impact management, are largely consistent with the World Bank environmental and social standards. However, there are gaps, outlined in Table **1.** The table shows the analysis and gives recommendations to be applied for the Project. The International Federation of Consulting Engineers is applied by the PA in project management and is considered in the analysis.

Table 1: Gap Analysis of World Bank ESSs and Palestinian's laws and Regulations

Issue	Palestinian requirements	World Bank ESF	Recommendations
Environmental and social risk classification and assessment	Low, medium, significant.	Four classifications: High Risk, Substantial Risk, Moderate Risk or Low Risk.	World Bank ESF prevail.
Environmental and social assessment instruments	Category A, B and C.	Environmental and social instruments ESIA, ESMP, ESMF, etc.	World Bank ESF prevail.
Impact Categorization	The threshold for "significant" impacts not precisely defined. Project categorization based on an established list of projects.	"High and Substantial Risks" refer to projects with adverse impacts that are sensitive, diverse, or unprecedented, and where impacts may affect an area broader than the site of physical works.	Apply the World Bank's method for impact categorization.
ESF Objectives	National Laws and Requirements	Gaps whether there is or there is no significant gaps between ESS 2 requirement and the various national laws.	Apply ESS2 or national laws.
Promote safety and health at work	Refer to article 90, 91, and 92 of the Palestinian Labor Law No. 07 of 2000.	The World Bank EHS guidelines and GIIP are stricter than the national labor law and the World Bank OHS guidelines.	World Bank prevail.
Promote the fair treatment, non-discrimination and equal opportunity of project workers	Refer to article 16, 100, and 106 of the Palestinian Labor Law No. 07 of 2000.	There is a gap in regards to measures to prevent and address harassment, intimidation and/or exploitation. Where Palestinian Labor law is inconsistent with this clause, the project will seek to carry out project activities in a manner that is consistent with World Bank guidelines.	Apply World Bank Guidelines as stipulated in ESS2.
Protect project workers against (GBV) and child abuse/exploitation issues and Code of	Refer to articles 93- 99 of the Palestinian labor law No.07 of 2000 that discuss regulating the work of minors.	There is gap between the national labor law and the World Bank in GRM and stakeholder engagement related to GBV/SEA/SH.	World Bank prevail.

Conduct (CoC) and contracted workers and direct workers, as appropriate.	Also, refer to article (4) of amendment #19 of 2012 and child law No. 07. No National law in regards to gender based violence.	Refer to World Bank ESF guidelines in regards to gender based violence.	Apply World Bank Guidelines in ESF.
Prevent the use of all forms of forced labor and child labor	Refer to articles 93-99 of the Palestinian labor law No. 07 for the year 2000 that discuss regulating the work of minors.	There is a gap in regards to forced labor.	Apply World Bank Guidelines in ESF
Support the principles of freedom of association	Refer to article 5 of the Palestinian labor law No. 07 of 2000 that ensures that both workers and employers have the right to establish union organizations.	There is no gap between the national labor law and the World Bank OHS guidelines.	Apply Palestinian Labor Law
Provide project workers with accessible means to raise workplace concerns and grievances	The right of public to complain is ensured by the grievance bylaw approved by the Ministerial Cabinet on 2005 and updated on 2009.	The ESF requires that a GM will be provided for all direct and contracted workers (and, where relevant, their organizations) to raise workplace concerns.	Apply World Bank Guidelines in ESF
Avoid adverse impacts on health and safety of PAPs including exposure to project-related traffic, diseases and hazardous wastes during the Project lifecycle.	Based on FIDIC 99 (applicable in Palestine) clause 4.8 and 6.7; a Safety plan should be provided: · Work only at the allowable hours. · Use safety PPE. · Apply OHS measures	There is gap resulted from the fact that FIDIC only provides general guidelines	Apply FIDIC and ESS4: · General EHS Guidelines. · Community Health and Safety. · OHS.
To have in place effective measures to address emergency events	Based on FIDIC 99 clause 4.8 and 6.7; Safety plan should be provided. The emergency phone numbers should be available in the site and easy to access. Provide a first aid box.	There is gap resulted from the fact that FIDIC only provides general guidelines	Apply FIDIC and ESS4: · General EHS Guidelines. · Community Health and Safety. · OHS.

Safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the PAP	Safety plan should be provided.	There is a gap where there is no coverage for this issue in any national document.	Apply FIDIC and ESS4 (section 3.2.7): · General EHS Guidelines. · Community Health and Safety. · OHS.
Stakeholder engagement and information disclosure	Consultations are required for EA. Public disclosure is not required for projects that do not require a full EIA.	The World Bank requires engage with stakeholders, through information disclosure, consultation, and informed participation. SEP shall be developed and disclosed. Public disclosure is required for all EA reports.	World Bank ESF prevail.
Public consultation and accountability	Weak requirements for public consultations. Public availability of the documents is required for full EIA. Consultations are required during the preparation of the EIA between communities and the project proponent. Public hearings are at the government's discretion during the EIA review and approval process.	Requires consultation with the affected people. It is to ensure that the identified stakeholders are appropriately engaged with on environmental and social issues that could potentially affect them through a sustained public participation process comprising both information disclosure and meaningful consultation.	Ensure consultation and ongoing communication throughout the Project implementation period.
Public Disclosure	Public disclosure is not required for projects that do not require a full EIA.	Public disclosure is required for all ESIA reports, including those that do not require full ESIA.	Apply the World Bank's requirements for public disclosure.
Project GRM	The Palestinian Bylaw sets the rules for grievance of the public and improving the performance of the Palestinian Ministries and Authorities. No project GRM is required.	The ESS ensures reception and timely response to any complaints made about the Project and be the basis for developing appropriate mitigation strategies	World Bank ESF prevail.

2.7 Environment, Health and Safety Guidelines

31. The World Bank Group Environment, Health and Safety Guidelines[2] (EHSG) are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). They define acceptable pollution prevention and abatement measures and emission levels in World Bank financed projects. The project will apply the EHSG including occupational Health related to workers with Ministries and workers who will directly engage with the public in health and other social services provided by selected NGOs.

2.8 COVID-19 Considerations

32. The Government of Palestine addressed COVID-19 with some emergency resolutions and policies that include universal guidelines aligned with WHO guidelines related to social distancing, masks and a complete ban on large gatherings. The Ministry of Health (MoH) is regularly updating the COVID-19 measures that are mandatory in the country.

33. In addition to the Government guidelines, the World Health Organization (WHO) guidelines in response to COVID-19 such as the procedures for protection workers in relation to infection control precautions and provision of immediate and ongoing training on the procedures to all categories of workers will be used. As the COVID-19 situation varies, it is critical that MoF keep abreast of guidance provided by the WHO and other international best practice.

[2] https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

CHAPTER THREE: ENVIRONMENTAL AND SOCIAL BASELINES

3.1 General

34. The West Bank has an area of 5820 km2 and populates about 3.5 million inhabitants distributed among 11 administrative governorates; the largest is Hebron at south, which extends at 20% of West Bank area. Gaza populates about 2 million living in on an area of 365 km2, ranked the 3rd most densely populated polity in the World. Figure 3 shows the WB&G and identifies the areas A, B, and C as to 1993 Oslo agreement. It also points out the main cities and the main and regional roads.

3.2 Baseline Environmental and Social Information

35. As with the original SPJ COVID-19 Project, the Additional Financing (AF) has the same E&S baseline and country-wide coverage. The Palestinian Territory (Pt) covers an area of 6,020 sq. km and is composed of two physically separated land masses: The West Bank and the Gaza Strip. The West Bank has an area of 5,655 sq. km, and the Gaza Strip has an area of 365 sq. km. The geography of Palestine is characterized by a diverse topography, and its terrain includes coastal and inner plains, mountains, and hills. The Palestinian population in the West Bank and Gaza reaches 5.1 million, of which 3.05 million are living in the West Bank and 2.05 million in the Gaza Strip. There are 16 governorates: 11 in the West Bank and five in the Gaza Strip.

36. At the time of Parent Project appraisal, there were around 4,341 confirmed cases in West Bank and Gaza, with 491 recovered and 17 deaths. Currently, the cases are rising and vaccination rates are yet to catch up. The total number of registered cases in West Bank and Gaza stand at 346,245 with 3,877 deaths. While vaccination is progressing with over 601,453 people vaccinated both in West Bank and Gaza, including 420,641 receiving the two vaccines, this results in only abour 9% of population being fully vaccinated.

37. The socio-economic conditions in Gaza have been further exacerbated by the May 2021 escalations. With regards to the Pandemic, currently there are 116,907 registered cases and 1100 deaths in Gaza. The May 2021 crisis has further pushed vulnerable households into poverty, impacted infrastructure and personnel in sectors ciritcal for pandemic response and recovery (including health, social services and education), further complicating recovery from the COVID-19 wave that was overwhelming medical system in spring of 2021.

38.

3.3 Economic situation in Palestine

39. The spread of the COVID-19 has disrupted economic activity in Palestine. The World Bank projects that the Palestinian economy will contract by at least 2.5 percent in 2020, while the Palestinian Central Bureau of Statistics (PCBS) estimates losses of about US$2.5 billion, representing a decline of 14 percent of GDP if the COVID-19 pandemic lasts more than three months. The World Bank Economic Assessment and Proposed Actions for the PA also considers a number of major downside risks that could impact the economy and household livelihoods including: (i) the potential for the private sector to slash workers' remunerations in half and other violations of working conditions, (ii) the impact of a potential halt in the entrance of more than 140,000 Palestinian workers to Israel, and (iii) a sharp

reduction in tourism. The lack of available policy tools, such as fiscal stimulus, liquidity injections, or external borrowing, could leave the economy extremely vulnerable to the materialization of such risks, which could then trigger a dramatic decrease in consumption and a sharp economic contraction of more than 7 percent (World Bank 2020). The COVID-19 shock falls on an already very fragile economy, which has already suffered from plummeting foreign aid flows since 2012, the Gaza conflict in 2014, Gaza War 3021, and the fiscal shock of Israel's decision to withhold revenues. Under pressure from these shocks, growth rates have been barely positive since 2017, with 2019 growth estimated at only 0.9 percent—which means a significant fall in per capita income.

3.4 Labor Markets

40. Reduced labor incomes have come from job losses, including from Palestinians working in Israel, and reduced earnings, mainly as a result of the lockdown measures. The rapid job losses occurring now have come on the heels of stubbornly high unemployment rates that existed well before the crisis. Between 1994 and 2017, unemployment grew at an annual average rate of 5 percent, at an accelerating pace. It peaked at over 32 percent in the second quarter of 2018—the highest rate in two decades, to then fall to 24 percent in the last quarter of 2019. As the economic effects of COVID-19 continue to roll through the economy, the damage to an already-fragile jobs environment is likely to be profound. Job losses are likely to most affect those groups with higher-than-average unemployment rates: women (41 percent compared to 21 percent among men) and youth (40 percent), two groups who often experience the longest wait times for a job and then are the first fired within the labor marketplace. Women in the private sector are at risk of both losing their jobs and not being able to return to work given the specific constraints they face during economic shocks and a subsequent shrinking of the job market. In addition, they are likely to be the ones who will bear the greatest responsibilities for taking care of their children during school closures as well as family members who may fall sick.

3.5 Sectorial Context

41. The PA's national COVID-19 response plan developed in late February 2020 includes a strong focus on supporting poor households and workers that are particularly impacted by the economic slowdown. Among many actions, the plan highlights the need to provide temporary protection/relief measures for the poor and vulnerable households and workers that have lost employment while promoting investment to business owners to speed recovery. More specifically, actions include: the creation of temporary employment programs; support for municipalities and local councils; the provision of assistance to those small businesses being hit hardest to speed up recovery; and emergency cash-transfer assistance to the poorest households and those vulnerable to poverty that have lost jobs and livelihoods. An electronic enrollment program targeting more than 200,000 vulnerable-to-poverty workers impacted by the crisis has been put in action in March 2020.

42. The Palestinian National Cash Transfer Program (CTP) was created in 2010, merging the EU-funded Special Hardship Case (SHC) and the World Bank-funded Social Safety Net Reform Project (SSNRP), and initially provided cash assistance to about 55,000 poor households selected on the basis of an objective proxy means test formula. The CTP gave the PA the opportunity to consolidate, harmonize, and further develop social assistance that was mostly provided through a complex web of organizations run by the PA, non-governmental organizations (NGOs), and other external agencies. The National Cash Transfer

Strategy identified cash transfers as the main social assistance instrument to fight poverty because of their proven track record and the possibility to scale them up quickly and effectively to aid distressed households during crisis situations. The CTP has become a full-fledged national Social Safety Net (SSN) program that provides quarterly payments to about 115,000 beneficiary households through the banking system, with an estimated total cost of about US$130 million a year.

3.6 COVID-19 Situation

43. The WHO risk assessment for COVID-19 in Palestine is classified as very high. Until September 8, 2021, there have been 388,649 confirmed cases of COVID-19 with 4,023 deaths. These cases were recorded in the West Bank, including East Jerusalem and Gaza Strip.

44. Gaza was ranked the first with (139,692) cases, followed by Hebron (45,888) cases, Nablus (40,221) cases, Ramallah and al-Bireh (34,542) cases, Jerusalem city (29,413) cases, Jenin (22,200) cases, Tulkarm (19,409) cases, Bethlehem (17,987) cases, Jerusalem suburbs (10,944) cases, Salfit (8,454) cases, Jericho & the Jordan Valley (4,516) cases, Qalqiliya (9,860) cases besides to Tubas (5,523) cases. The MoH formed the following committees to combat the COVID-19 epidemic in Palestine: The National Corona committee, The National Protocol Committee, National Epidemiology Committee, and Corona Cell at MoH.

3.7 Gender

45. International and Palestine evidence of increases in gender-based violence is observed as a result of the job losses and business closures that have come during the pandemic. Women become more vulnerable to domestic violence as confinement is fostering the tension and strain created by security, health, and money worries since women may contribute less to the household income either through losing their jobs or experiencing foreclosures in women-owned small businesses.

46. In Palestine, more than twenty percent of woman responding to the “CARE Palestine WBG COVID-19 Rapid Gender Assessment” shared that they have experienced an increase in gender-based violence (GBV) security concerns, including intimate partner violence and domestic violence. The assessment showed that one in four surveyed indicated domestic violence has increased during quarantine and 71 percent expect it to further increase with the extension of the lockdown. Moreover, surveys by the Palestinian Central Bureau of Statistics (PCBS) and data from gender-based violence helplines point to high rates of Intimate Partner Violence (IPV) against women: 24 percent of women in West Bank and 38 percent of women in Gaza have been exposed to some form of IPV between 2018-2019.

47. Of those women who reported some form of IPV, 60 percent chose to remain silent. As other countries report increased levels of domestic violence during the pandemic, the population of the Palestine are experiencing similar trends. Hence, increases in GBV must be addressed as it is a major challenge during a pandemic when resources are likely to be diverted to respond to the immediate health crisis, in turn, affecting the availability of and accessibility to essential services for women and girls who experience violence.

CHAPTER FOUR: SUMMARY OF THE PROJECT

4.1 Introduction

48. The outbreak of the COVID-19 crisis in the West Bank and Gaza and the May 2021 war in Gaza has exacerbated the already-deteriorated health and socio-economic conditions of Palestinians, particularly among the poorest and most vulnerable groups, including elderly people, persons with disabilities, and households headed by women.

49. In the West Bank and Gaza, it is anticipated that these crises will result in significant numbers of households falling into poverty (or deeper into poverty) as a result of the enormous economic impacts of measures needed to contain this virus and the Gaza War effects; recovery from the economic impact of this will not be a short-term project but a long-term process aimed at bringing the economy back to pre-pandemic levels and the may war in Gaza. Those most vulnerable to the economic dislocations are small businesses, those without job security, and those in the informal economy and in unpaid care.

50. The proposed operation aims to respond to the immediate needs arising from the pandemic and whom affected with the May war in Gaza, while also contributing to medium term development goals, including increased economic inclusion, improved service delivery, and private sector development. By helping to avert the negative social and economic impacts of the pandemic on the population, the project is well aligned with the World Bank Group's twin goals of eliminating extreme poverty and promoting shared prosperity in a sustainable manner.

4.2 The project Components

The Original Project (West Bank and Gaza Emergency Social Protection COVID-19 Response Project-P174078 had four components and the AF will retain the same components as shown below:

Component 1: Emergency Cash Transfers in the West Bank (US$ 20 million)

51. This component will finance a one-time cash transfer to poor households and those households vulnerable to poverty affected by COVID-19 in the West Bank. The emergency cash transfer program aims to reach two groups of at-risk households: (i) applicants for the new COVID-19 relief support launched by the MoSD, the MoL, and the Ministry of Local Government (MoLG), and (ii) poor households already registered in the MoSD's CTP system. Therefore, this component will include two sub-components: (1.1) Emergency Cash Transfers to households vulnerable to poverty not currently benefiting from the CTP system, and (1.2) Financing of the CTP-funding gap. To ensure timely support, the implementation of the component will rely on the MoSD's delivery system to work as a back-office service delivery for all cash transfers, which builds on the existing World Bank engagement with the MoSD through the ongoing Social Protection Enhancement Project (SPEP).

Subcomponent 1.1. Emergency Cash Transfer to households vulnerable to poverty (budget US$ 13.9 million)

52. This subcomponent will finance a one-time cash transfer up to 65,000 vulnerable households from the West Bank that are currently not benefiting from the CTP program. The subcomponent aims to reach households that were vulnerable to poverty prior to the pandemic, or workers who have lost their income due to the pandemic. Another possible beneficiary group is other households with vulnerable members such as children and persons with disabilities, in areas especially affected by the COVID-19 outbreak. This subcomponent will be implemented by the MoL, which will be responsible for

defining the criteria for the selection of beneficiaries, running program communications, and finalizing the beneficiary list. This will be discussed and agreed upon with the project partners – MoSD and MoF. In addition, the MoL will work in close collaboration with the MoSD to focus on the quick and efficient service delivery of the cash transfer. The MoSD, through the CTP program unit, is expected to be the data curator, data administrator, and system developer to ensure data entry and cross-verification with other systems to guarantee the quality of the information. Moreover, the MoSD will be the entity triggering and administrating payments to selected households based on their accumulated experience with payments under the CTP.

Subcomponent 1.2: Financing of the CTP-funding gap (budget US$ 6.1 million)

53. This subcomponent will finance the temporary CTP financing gap and ensure that CTP-beneficiaries will receive the 2nd quarterly payment for 2020 to cover their basic needs and avoid falling deeper into poverty. An estimated 21,400 CTP households (out of a total number of 115,000 CTP beneficiaries) will benefit from this subcomponent. The subcomponent targets households that were already poor prior to the pandemic and are likely moving further below the poverty line as a result of crisis. This subcomponent will be implemented by the MoSD, building on the ongoing CTP registry and the operating delivery systems.

Component 2: Cash for Work in the West Bank (C4W) (US$8 million)

54. This component will finance short temporary employment opportunities for approximately 3,060 households (up to 15,300 benefiting people) of which at least 1,530 will be women, building on the delivery model developed for Gaza. This component will provide Cash for Work sub-grants to selected NGOs to implement C4W subprojects employing the targeted vulnerable populations. Supported subprojects will focus on health and other social services provided by NGOs to vulnerable groups affected by COVID-19, but also include economic livelihoods initiatives to assist vulnerable populations in the recovery from the crisis. Services to support economic livelihoods will mainly be in the area of agricultural activities but other types of activities could also be considered. Health services include clinics and other health services, including support to people with disabilities and elderly populations. Other social services in which beneficiaries will be employed will be as teachers in the education sector, as social workers providing psychosocial support, as workers to support women who have been victims of gender-based violence (GBV), and as providers of child services.

Component 3: Capacity Building Project Management, Monitoring and Evaluation (US$ 2 million)

55. This component will ensure that the PCU housed at the Ministry of Finance and the technical entities working directly with the PCU will be operational and will implement the project in conformity with the Legal Agreement, the Project Appraisal Document (PAD), and the project's Operations Manual. It will support the PCU, the MoSD, the MoL, and the PFESP with:

(1) The management, monitoring and evaluation (M&E) of project activities, to cover:

- Remuneration of project staff and consultants who are not civil servants;
- Equipment and operating costs for the PCU, the MoSD, the MoL, and the PFESP directly linked to the daily management of the project;
- IT and systems;
- Contractual services, including funding human resource experts who are not public servants for assignment to the MoL and the MoSD as needed;
- Communications activities;
- Monitoring and evaluation activities.

- Financial management and control including budget control, follow-up on procurement and disbursement

(2) Capacity building is an integral part of the project to enhance resilience against future social and economic crises and shocks, including climate-related shocks. The component will provide support for the project's key partners in the following areas:

- Training of the PFESP, MoL, and MoSD staff as needed to ensure adequate capacity to implement current and future labor market programs in the Palestine;
- Support on the design, communication and outreach, identification, registration, needs assessment, enrollment, payment mechanism, management information system, and grievance and redress system;
- Technical assistance to support the development of an enrollment form for the households that are vulnerable to poverty;
- Development of a high-frequency crisis monitoring survey, including a high-frequency phone survey to monitor the socioeconomic impacts of COVID-19 and the mitigating effects of Project interventions on beneficiary households.

Component 4: Contingent Emergency Response Component (CERC)

56. In the event of a future eligible crisis or emergency, the project will contribute to providing an immediate and effective response. This component would draw from uncommitted funds under the other components of the project. In the event that the CERC is activated, the restructuring of the project would need to occur within three months after activation.

57. the main modifications as a result of additional Financing and Project Restructuring as shown below:

Proposed Changes under the Additional Financing and Restructuring

1. The proposed AF and restructuring of the parent project will finance the costs associated with the scaling up of project activities. The PDO of the proposed AF will be amended to reflect the expansion in the geographical coverage to Gaza, following the CERC activation of May 28, 2021. Therefore, the revised PDO will read as follows: *to provide cash support and short-term employment opportunities to vulnerable populations in the West Bank and Gaza affected by emergency shocks including COVID-19.* Activities to be supported under the AF and the restructuring are summarized below:

2. **Component 1: Emergency Cash Transfers to the West Bank (US$2,433,366).** The restructuring will allow the expansion of cash transfers to the Gaza Strip; thus, the Component will be adjusted to read: "**Emergency Cash Transfers to the West Bank and Gaza**". This component will finance cash transfers to approximately 87,985 (compared to 89,400 in the Parent Project) poor and vulnerable-to-poverty households affected by COVID-19 and other shocks in West Bank and Gaza. The component will include two sub-components: (1.1) Emergency Cash Transfers to households vulnerable to poverty not benefiting from the Cash Transfer Program (CTP) system (US$0), and (1.2) Financing of the CTP-funding gap (US$2,433,366)**.** As in the Parent Project and to ensure timely support, the implemention of component 1 will rely on MoSD's delivery system to work as a back-office service delivery for all cash transfers, which builds on the existing platforms and mechanisms developed through World Bank engagement with MoSD through the CTP-Project and the ongoing Social Protection Enhancement Project (SPEP).

Sub-component 1.1: Emergency Cash Transfers to households vulnerable to poverty, including those affected by the pandemic in both the West Bank and Gaza and households that have been pushed further into poverty due to the worsening economic conditions in Gaza. This sub-component will be

fully covered by the Parent Project and is financed by the Trust Fund for Gaza and the West Bank (TFGWB). As a result, this sub-component will reach around 22,989 beneficiary households in Gaza and an additional 447 female headed households impacted by the COVID-19 crisis in Gaza and the West Bank, bringing up the total number of beneficiaries under the restructuring to 23,376. Accordingly, with the 34,125 households already reached under this sub-component, the total number of household beneficiaries under this sub-component will be 57,400 instead of 65,000.

3. ***Sub-component 1.2: Financing of the CTP-funding gap.*** Given the continued fiscal constraints of the PA, the AF will contribute to bridging the financing gap of the upcoming CTP quarterly payment. This will help in reaching out to registered CTP households in both the West Bank and Gaza. The expected number of households that will benefit from this allocation is approximately 9,185, leading to a total number of CTP household beneficiaries of 30,585.

4. For due diligence purposes, the Project will ensure the use of the Project Operations Manual (POM) approved by the World Bank, containing detailed procedures for implementing the Project, including the requirements to be fulfilled by the local branches of MoSD and beneficiaries as pre-requisites for the provision of cash transfers, the criteria for identification, registration and selection of beneficiaries, the procedures for payments and the amount of cash transfers, and the verification mechanisms. Cash transfer beneficiaries will be vetted according to eligibility criteria and conditions set forth in the POM. The PCU will ensure that all fiduciary controls are complied with. The project M&E system includes spot checks and audits, as well as evaluations to ensure that the controls are not only in place but are strictly enforced. For cash transfer recipients, the funds will be deposited directly into beneficiaries' bank accounts to increase transparency. Discussions with the MoF are ongoing to determine whether the use of the digital payment mechanism in Gaza would be feasible at project effectiveness.

5. **Component 2: Cash for Work in the West Bank (C4W).** This component will be expanded to reach additional beneficiaries in the West Bank. It will provide sub-grants to selected NGOs to implement C4W sub-projects employing targeted vulnerable populations, through temporary employment aimed to address health and social needs. The AF is expected to provide short-term, temporary employment opportunities for approximately additional 880 individual beneficiaries (of which at least 50 percent will be women), building on the delivery model developed for Gaza. The total of 3,940 beneficiaries will thus be supported by the overall project. Supported subprojects will focus on health and other social services provided by NGO's to vulnerable group and will also include economic livelihoods initiatives to assist vulnerable populations in the recovery from the COVID-19 crisis. Services to support economic livelihoods will mainly be in the area of agricultural activities but other types of activities could also be considered. In the area of health, the project aims to support functioning of health clinics and other health services, including support to disabled and elderly populations, through addressing manpower constraints in the sector. Beneficiaries will also be employed as teachers in the education sector, as social workers providing psychosocial support, as workers to support women who have been victims of gender-based violence (GBV), and as providers of child services.

Component 3: Capacity Building Project Management, Monitoring and Evaluation. No AF resources will be allocated to this component. As in the Parent Project, funds allocated from the TFGWB will continue to support project coordination, M&E, and all aspects of management, including fiduciary aspects, communication, and environmental and social safeguards related measures.

Component 4: Contingency Emergency Response Component (CERC). This component will remain available for rapid response in the event of an emergency, subject to a request from the MoF. 8,000 beneficiary households will be moved back to Component 1.1 to respond to the worsening economic

conditions in Gaza.

4.3 Potential Subprojects

58. Based on the project description and components, it is anticipated that the project will likely involve: (i) cash transfer to households vulnerable to poverty affected by COVID-19 in the West Bank and Gaza, (ii) households vulnerable to poverty affected by the May war in Gaza, (iii) subprojects in relation to Component 2 (C4W) employing the targeted vulnerable populations in health and other social services provided by selected NGOs, (iv) subprojects in economic livelihoods services in the area of agricultural activities, health services include clinics and other health services, support people with disabilities and elderly populations, (v) social services in which beneficiaries will be employed as teachers in the education sector, as social workers providing psychosocial support, as workers to support women who have been victims of gender-based violence (GBV), and as providers of child services.

4.4 Project beneficiaries

59. Overall, the project will involve a range of beneficiaries including:

4.4.1 Component 1 (Emergency Cash Transfer):

60. Households that were vulnerable to poverty prior to the pandemic and workers who have lost their income due to the pandemic, This includes households that had earned their labor income from formal jobs, daily activities, and informal sources, as well as potentially other households with vulnerable members, such as children and disabled persons, in areas especially affected by the COVID-19 outbreak and Gaza War. Target working-age beneficiaries will receive a one-time payment of 700 ILS. CTP beneficiaries: CTP beneficiaries that are currently listed in the MoSD CTP database that were already poor prior to the pandemic and before Gaza War are likely moving further below the poverty line as a result of the crisis Its planned to develop an online portal at MoL where targeted beneficiaries can apply because MoSD database is not enough. The Joint Committee to Inventory the Damage of the War on Gaza. Application will be reviewed by MoL and MoSD teams following clear criteria, and the final list of beneficiaries will be sent to MoF for payment. The benefit will be a one-time payment of 700 ILS.

After restructuring sub-component 1.1 around 21,665 new beneficiaries will be added all from Gaza" CTP waiting list, new CTP and affected people with Gaza War". There are several sources of data covering people affected with Gaza War, such as MoL, PFESP and MoSD.

4.4.2 Component 2 (Cash for Work)

61. Unemployed members of the labor force (at least fifty percent will be women): Priority in this component will be given to individuals within the target population who have lost their jobs as a direct result of the COVID-19 pandemic and its consequences. Six monthly transfers will be provided to participants in this component who are currently unemployed, working-age individuals. Target areas of short-term employment will be in health, education and social services provided by participating NGOs to vulnerable groups affected by COVID-19 but also include economic livelihoods initiatives to help in the recovery process.

This component is scaled up with the AF project. Around 940 new beneficiaries (at least 50% women) will get temporary jobs for six months in the same sectors as the parent project selected sectors for the C4W component.

4.4.3 Component 3 (Capacity Building Project Management, Monitoring and Evaluation):

62. MoF, PFESP, MoL, and MoSD staff

4.4.4 Component 4 (Contingency Emergency Response):

63. Part of this component will be allocated to target poor people in Gaza. 8,000 poor beneficiaries who are currently listed in the MoSD CTP database and were already poor prior to the pandemic and are likely moving further below the poverty line as a result of the crisis will be targeted.

CHAPTER FIVE: ENVIRONMENTAL AND SOCIAL IMPACTS

64. This chapter describes and analyzes the potential environmental and social impacts and risks that the implementation of the Project poses and the mitigation measure for the negative impacts.

5.1 Positive Impacts of the project

65. The project will provide cash transfers to about 65,000 poor and vulnerable households and temporary employment support to around 3,940 households (up to 19,700 benefiting people) of vulnerable workers under the C4W component. At least fifty percent of beneficiaries under the C4W component will be women. The estimated number of all individuals benefiting from the project (both components combined) is 359,700 (using an average family size of five).

66. The specific positive impacts of the project are: (i) provide emergency relief to those in need, valuable work experience, and improved social services, (ii) provide a temporary safety net to vulnerable and poor households and will also contribute to reducing the deficit in health and social services through temporary job creation, (iii) help to mitigate the social and economic impacts of COVID-19 (iv) improve the employability and skills development of participants and will have beneficial effects on the population's human capital, (v) contribute to long-run growth and productivity, and (vi) create the opportunity to support NGOs that focus on GBV prevention and response activities.

5.2 Assessment of Environmental and Social Risks and Classification as per World Bank's ESF

Environmental Risk Rating: Substantial

67. The PIU will be primarily responsible for ensuring the environmental and social risks are mitigated at each stage of project operation. Since the World Bank ESF applies to the project, the PIU will address risk mitigation through the relevant ESSs.

ESS 1 - Assessment and Management of Environmental and Social Risks and Impacts.

68. For the cash transfer component, since most of the application and payments for targeted beneficiaries are expected to come through the online portal at MoL and the data base at MoSD, the risks of exposure to COVID-19 contagion for the beneficiaries is expected to be minimal. Also the source of data and applications for beneficiaries affected with Gaza War will also expected to come through the online portal at MoL, MoSD, PFESP and the Joint Committee to Inventory the Damage of the War on Gaza, the risks of exposure to COVID-19 contagion for the beneficiaries is expected to be minimal.

69. The project will neither support the procurement of any materials or equipment, except for few number of computers, nor rehabilitation or construction activities or civil works.

70. The installation activities for the procured computers includes positioning of electrical plug fixtures, laying of electrical wires to connect the new computers, etc. The anticipated potential environmental impacts may include: (i) generation of minor solid waste from the installation activities and from end of life of equipment; (ii) management and disposal of waste; (iii) nuisance related to vibration and noise during installation activities; and (iv) OHS risks related to installation activities including exposure to electrical hazards from the use of tools, noise and dust, and falling and falling objects. The impacts are expected to be site specific, short-term and reversible.

71. Social workers under component 2 will be associated with health clinics, with support to disabled children in schools, early childhood support, assistance to the elderly and to those with preconditions who can be more vulnerable to the COVID-19 infections and may increase OHS risks. For COVID-19 related OHS risks, workers will follow proper hygiene, social distancing measures and other safety precautions as detailed in the ESMF, the WHO standards and other Government guidelines (see Annex 1 for guidelines on public works under COVID-19 context).

72. Workers to be engaged by MoF and the NGO under component 2 (C4W) might be exposed to risk of fire hazard in the NGO's buildings where they will be employed. The Ministry building and all existing NGO buildings accessible to the workers and public should implement life and fire Safety requirements by incorporating all local building codes and fire department regulations. A life and fire safety review of the building should be conducted by a suitably qualified professional and ensure that Operation and Maintenance (O&M) practices meet all local building codes and fire department regulations. This assessment may be performed by the competent authorities or by a third party if MoF has limited capacity. The General EHS Guidelines refers to US National Fire Protection Codes (NFPA) as one example of an internationally accepted L&FS standard and may be used to document compliance with the Life and Fire Safety objectives outlined in WBG General EHS Guidelines.

73. Also, workers in the agricultural sector (working in potential activities in small scale farming (crops, fruits, vegetable cultivation), and farmer fields and cooperatives providing fruits and vegetables to schools, social services and to markets and small-scale herders, small scale processing of fruits and vegetables to make them market ready, such as dried fruits, herbs, olives etc.) would be subject for OHS risks including: (i) exposure to physical, chemical and biological hazards; (ii) COVID-19 related risks; (iii) injuries from working with tools (iii) exposure to pesticides for benefiting workers to be employed in the agricultural sector. The ESMF is to handle these negative impacts and provides required mitigation guidelines and plans for the subproject in case these are to be prepared.

74. Component 4 of the project is the Contingent Emergency Response Component (CERC) which in the event of eligibility crisis or emergency was activated in May, 2021 to provide an immediate and effective response for CTP waiting list in Gaza. The restructuring of the project occurred after three months after effectiveness. A CERC Operations Manual was prepared during project implementation to govern the operation of the CERC. The manual is aligned with the ESMF at the time of preparation and include provisions to ensure environmental and social due diligence in line with the requirements of the ESF. Furthermore, the ESMF includes a negative list (Annex 7), and may also have to be updated depending on the scope of the activities included in the CERC component.

75.. Social risks associated with Cash for Work (C4W) activities include (i) full inclusion of eligible beneficiaries, particularly vulnerable groups who have limited access to information about the income support program and project benefits; (ii) inadequate consultations with relevant stakeholders during the preparation and implementation of the C4W; (iii) working conditions such as overtime, unpaid salary in part or in full, minimum age and child labor risks, rights of association are not in accordance with the requirements of national law and ESS2 and occupational health and safety risks to project workers over; (iv) occupational health and safety risks to project workers related to the nature and type of the working space including exposure to pesticides for benefiting workers to be employed in the agricultural sector in

addition to risks potential COVID-19 infections as they interact with other staff and community members associated with the project including health and education sectors; (v) potential risks of SEA/SH linked to access to work in addition to gender-based violence and increase in domestic violence due to financial strains on households and the receipt of financial transfer; and (v) social tension between project beneficiaries and non-project beneficiaries, especially if there is lack of transparency in the application and decision-making process.

76. Risks related to cash transfer activities in West Bank and Gaza (components 1 and 4) include (i) the potential exclusion of some vulnerable and disadvantaged groups including exclusion errors due to failure or delays in updating beneficiary information regularly; (ii) potential risks of GBV, Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) within families as beneficiary women get economically empowered by the project due to financial transfer; (iii) create social tension between project beneficiaries and non-project beneficiaries within the same community if the targeting mechanism is not transparent enough. Among vulnerable groups, the Project has identified the following: (i) beneficiaries with accessibility challenges (such as the disabled, female headed households, or elderly households, population with limited digital literacy); and (ii) vulnerable households currently not captured by the existing project design.

77. Thus, the project will implement mitigation measures in accordance with the ESMF, SEP and LMP prepared for the Project, including measures to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the project benefits. The MoF will prepare other instruments, as required, for the respective Project activities including selection of implementing NGOs based on the assessment process, the ESSs, the ESMF, the EHSGs, and other relevant Good International Industry Practice (GIIP) including the government and WHO guidelines on COVID-19, in a manner acceptable to the Bank.

ESS 2 – Labor and Working Conditions

78. The project workforce includes: (i) direct workers, mainly the staff involved in the project from MoF-PCU, MoSD, MoL and PFESP, (ii) contracted workers, mainly the staff at the NGOs and the employed targeted beneficiaries in the health, education, agriculture and other social services to support vulnerable groups with disabilities and elderly populations. In addition to the workers OHS risks discussed above; labor risks related to the working conditions are possible. The MoF has prepared a LMP detailing the procedures to establish and maintain a safe working environment; covering OHS measures and procedures; terms and condition of employment; non-discrimination and equal opportunities; prohibition of forced labor & child labor; and workers' rights such as overtime, unpaid salary in part or in full, minimum age for direct and contracted workers, in a manner consistent with the requirements of national law and ESS2. The LMP prepared, disclosed, and being used for the parent project will be updated in line with AF requirements and used as the LMP for the AF.

79. Potential labor risks for AF is the same for the parent project and are related to OHS, working conditions, child labor in agricultural subprojects, and SEA/SH risks for workers. These risks will be managed in accordance with the AF LMP. The LMP prepared, disclosed, and being used for the parent project is updated in line with AF requirements and will be used as the LMP for the AF. The AF LMP will be reviewed and cleared by the Bank and disclosed in-country and on the Bank system within one month of effectiveness. The LMP will cover an assessment of potential labor related risks; an overview of labor regulations, policies and procedures; an assessment of and a plan to prevent SEA/SH

proportionate to the level of risk; contract terms and conditions; working age regulations; details of the workers' GM; and other requirements of ESS2. The workers' GM will also address potential complaints related to SEA/SH and will have requisite features such as, ability to accept and respond to anonymous complaints and measures to ensure anonymity of complainants, referral mechanisms, and availability of trained personnel to accept and handle such complaints. Measures to prevent SEA/SH will also be included in the workers' CoC to be circulated among and signed by all project workers.

ESS3 – Resource and Efficiency, Pollution Prevention and Management

80. This standard is relevant. Solid Waste generated during the minor civil works for installation of computers in the existing ministries consists of municipal wastes that will be collected and disposed of in an authorized landfill. Wastes that may be generated from health services including clinics which support short-term employment could include liquid contaminated waste, chemicals, and other hazardous materials, and other waste from labs and quarantine and isolation centers including sharps, used in diagnosis and treatment. Medical wastes and chemical wastes can have a significant impact on the environment and human health. Medical services which support short-term employment will be required to apply Infection Control and Waste Management Plan (ICWMP) based on the Palestinian waste management plan and Good International Industry Practice (GIIP), especially WHO guidance. Template for ICWMP is presented in annex 2. The ICWMP for the parent project will be used for AF activities which will be further developed in each site specific ESMP. The general and specific World Bank Guidelines on Environmental Health and Safety (EHS Guidelines) will be ensured for all project activities.

81. The use of pesticides and hazardous chemicals such as preservatives by NGOs/contracted workers, and handling of solid, hazardous, and medical waste from the support to health services under Component 2 can have a significant impact on the environment and human health. Pesticides misuse in agriculture related NGOs can result in the following impacts: destruction of crop pollinators leading to poor crop yields; elimination of the natural enemies of crop pests and consequent loss of natural pest control that keeps the populations of crop pests very low; development of pest resistance to pesticides, encouraging further increases in the use of chemical pesticides; contamination of the soil and water bodies; pesticide poisoning of workers and deleterious effects on human health; unacceptable levels of pesticide residues in harvested produce and in the food chain; and loss of biodiversity in the environment. The proposed mitigation measures include: accepted agriculture NGOs which support short-term employment will be required to prepare Pest Management Plan (PMP) complying with the joint WHO and Food and Agricultural organization of the United Nations (FAO) permissible lists and doses3, and preferably use selective pesticides with low environmental impact quotient (EIQ), following the recommended practices for the storage, transport, handling application and disposal of each agrochemical. PMP will be prepared per template provided in annex 3-A and guidelines for use of preservatives and hazardous chemicals (annex 3-B) shall be followed, where applicable.

ESS4 – Community Health and Safety

[3] List of Pesticides evaluated by JMPR and JMPS – A:
http://www.fao.org/agriculture/crops/thematic-sitemap/theme/pests/lpe/en/

82. The social workers and other benefiting workers who will directly engage with the public in health education, community organizations and other social services provided by selected NGOs, would be interacting with communities. These interactions would increase the risk of exposure to the virus for these workers and also pose a similar risk for the communities, especially the vulnerable groups. The interaction during home visits, especially in homes without any male presence will also increase the risk of exposure of youth, including vulnerable youth and women to GBV, SEA/SH. Further, there are also risks of increased domestic violence due to financial strains on households and receipt of financial transfer. The project will ensure the avoidance of any form of GBV, SEA/SH of patients and community members at large by relying on (i) the WHO Code of Ethics and Professional conduct for all workers and (ii) World Bank guidelines on the mitigation of SEA such as the project benefiting workers will sign enforceable workers' codes of conduct (CoC), a sample CoC is presented in the Labor Management Procedures (LMP) prepared for the project, sensitization of workers and affected communities, and establishment of referral pathways. The project level GRM will include specific procedures for GBV including confidential reporting and ethical documentation of GBV cases. To prevent GBV risks, the project will embed culturally sensitives messaging in the delivery of the cash transfers and C4W to promote healthy conflict resolution and stress management at household level. It will also explore the use of behavioral insights, for example by labeling the transfers and top-ups in a way that values the redistribution of care work among household members. In addition, the Project presents community health and safety risks due to exposure to communicable diseases, including COVID-19, and potentially inadequate management of hazardous medical waste and pesticides under component 2. The project will follow WHO guidelines on long term care facilities and on OHS for social workers operating with vulnerable groups and will also implement relevant emergency preparedness and response measures.

83. The MoF prepared Community Health and Safety Management Plan (CHSMP) including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; provisions to prevent and respond to sexual exploitation and abuse, sexual harassment or GBV, in a manner consistent with ESS1 and ESS10, and commensurate with the risks, for example through formalizing strengthening referral pathways within the GRM, and proper disposal procedures of wastes to protect the communities. GRM referral pathways will include assigning an experienced social worker from the MoSD to handle and treat complaints on sexual exploitation and abuse, sexual harassment and domestic violence related to the project activities in coordination with the ESO. Information about the available GRM and referral pathways will be disseminated on social media, through local radios, and may also be printed and made available, and visible on project locations such as offices of NGOs selected to implement Cash for Work (C4W) and implement subprojects in community work and livelihood activities. The plan documents available resources and responsibilities, including the availability of PPE and disinfectants, in compliance with WHO recommendations and ESS2 and ESS4.

84. The project will take measures to provide awareness for social workers to strictly adhere to the guidelines issued on COVID-19 by the Government and the WHO protocols such as practicing proper hygiene, masking and other safety precautions including social distancing measures and using personal protective equipment (PPE) such as facemasks etc. (see annex 1 for guidelines on public works under COVID-19 context).

85. Furthermore, awareness will be made on risks of GBV, SEA and SH and on prevention measures and of the GRM in place. Social workers will receive training on survivors' centered approaches and referral pathways for GBV survivors.

86. The main community health and safety risks identified under the AF are the same as for the parent

project and related to transmission of COVID19 virus and potential exposure of benificiaries to communicable diseases by social workers associated with the project activities; potential cases of violence against children (VAC) during provision of childcare services under the C4W component; and risks associated with potential SEA/SH. To minimize these risks, the CHSMP prepared by MoF for the parent project will be used for the AF. The project GM and workers' GM including special tools for handling and addressing VAC and SEA/SH cases with referral pathways has been developed by MoF for the parent project. The project GM and workers' GM have been strengthened in the updated SEP to include the audit recommendations. The project level GM referral pathways also include assigning an experienced social worker from the MoSD to provide support on VAC and SEA/SH cases related to the project activities and to provide support to survivors. The project level GM also include confidential reporting and ethical documentation of VAC and SEA/SH cases. The workers' CoC also include measures to prevent VAC and SEA/SH.

ESS 10 – Stakeholder Engagement and Information Disclosure

87. ESS10 applies to all projects supported by the Bank through Investment Project Financing. The Borrower will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation. The MoF recognizes the need for an effective and inclusive engagement with all relevant stakeholders and the people at large. During the project preparation and due to the emergency nature of the situation related to COVID19, intensive consultations involving Ministry of Finance, Ministry of Social Development and Ministry of Labor have only been carried out and their buy-in has been secured with regard to the proposed institutional and implementation arrangements. At this point, two public consultations with stakeholders and affected parties and beneficiaries for cash transfer (on March 29, 2021) and C4W (on April 7,2021) were conducted based on the SEP prepared for the project. Inclusive consultations in the COVID-19 context shall be conducted with the project's beneficiaries and affected people during the project life-cycle.

88. The SEP prepared for this project supports clear communication and meaningful consultation, considering the needs of various stakeholders while also following the World Bank Group technical note on "Public Consultations and Stakeholder Engagement in WB and Gaza-supported operations when there are constraints on conducting public meetings". The SEP prepared for the parent project has been updated in line with the requirements of the AF, disclosed on October 5, 2021 and will be used as the AF SEP. Two public consultations for the AF and for the restructuring activities were conducted in August 16 and September 6, 2021 and have been reflected in the updated SEP. In line with the provisions of the ESCP, the MoF will apply the SEP to engage stakeholders as needed and for public information disclosure purposes.

89. As part of the LMP and SEP, a Grievance Mechanism (GM) for direct and contracted workers (Labor GM) as well as wider target population, beneficiaries and communities (Project GM) has been established for the parent project in each partner Ministry/Agency (MoF, MoSD & MoL and PSESP) and information about the GM has been disseminated to affected parties during consultations. The GM also includes features to accept and address potential SEA/SH related complaints, including referral mechanisms. The GM mechanism for the parent project will also be used for the AF and details about the GM are included in the updated SEP for AF. The GM also includes features to accept and address potential SEA/SH related complaints, including referral mechanisms. In addition, vulnerable and disadvantaged groups in the context of the project will be identified and mechanisms will be included for their engagement in implementing the SEP. The hired an environmental and social officer (ESO) at MoF-PCU will be responsible for monitoring the GRM systems at MoF, MoL, MoSD, PFESP and NGOs.

5.3 Environment and Social Mitigation Measures

90. Table 2 provides a detailed list of risks and impacts from project interventions and measures that can mitigate both potential environmentally and socially adverse impacts that may arise as a result of project activities. For additional mitigation measures refer to LMP and WHO Occupational Health and Safety Guidelines including annex 1, 2 and 3.

Table 2: Likely impacts and suggested mitigation measures of the Project

Issues/ Elements	**Risks/Impacts**	**Mitigation measure**
Small-scale civil works during the installation of the new computers. (Component 3)	Generation of minor solid waste Management and disposal of waste Nuisance related to vibration and noise during installation activities OHS risks	Ministry of Finance will ensure that: • Installation sites properly isolated by the suppliers/contractors, where these installations will take place. • Installation activities carried out within specified daylight hours. • Develop and implement waste management measures acceptable to MoF. • Abide by all pertinent waste management and public health laws. • Wastes will be stored in appropriate bins. • All waste will be collected and disposed of properly in approved landfills. • Contractor/supplier shall adhere to health and safety local regulations, WBG EHS guidelines and GIIP (Good International and Industry Practices) • Contractors/suppliers are required to develop proper emergency responses in advance, which shall be coordinated and approved by the MOF, in timely manner. • Commitment to the MoH and WHO guidelines regarding protection measures from COVID-19 pandemic (annex 1); • Contractors/suppliers must ensure that an OHS measures is in place to guide work activities and provide PPE and maintain a safe environment for workers. • Contractors must ensure that all workers have received regular training to perform their job, as well as daily inductions prior to work activities have taken place. • All relevant Labor and Occupational Health and Safety regulations must be adhered to, to ensure worker safety.

Issues/ Elements	Risks/Impacts	Mitigation measure
		• Workers must be provided with necessary equipment as well as protective gear as per their specific tasks such as overalls, gloves, goggles, boots, etc. • Contractors/suppliers must ensure that there are basic medical facilities on site and that there are staff trained in basic first aid.
Occupational and community health and safety hazards (C4W Component 2)	OHS risks including workplaces in health services, fruit and vegetables, agricultural and processes under their control and sets out measures for emergency prevention and preparedness and response arrangements to emergency situations. Exposure to pesticides, toxic agrochemicals, and preservatives in agriculture related NGOs Health and safety risk of exposure to the virus among communities especially for the vulnerable groups during interactions with all workers of the project as associated with COVID-19 infection, especially if proper hygiene, safety precautions and social distancing measures are not adhered to. These include staff of PCU, MoL, MoSD, PFESP and NGOs and selected beneficiaries for C4W. Worker packing and processing line injuries	Conduct a risk assessment of site safety hazards where benefiting all workers will be employed, and design and implement measures specific to mitigate the hazards. All work will be carried out in safe and disciplined manner; Contamination can be reduced using PPE, selecting adequate pesticides to use complying with Joint WHO/FAO list and avoid Pesticides WHO Class 1.a and 1.b, 2), and preferably use selective pesticides with low environmental impact quotient (EIQ), following the recommended practices for the storage, transport, handling application and disposal of each agrochemical; MoF will ensure compliance with the ESMPs and Community Health and Safety Plan. In addition to ensuring sound environmental and social health and safety procedures/plan with adequate provisions for minimizing occupational health and safety risks (for workers); ensuring use of appropriate PPE and hygienic precautions including face mask, orientation for workers about how to deal with different issues during the emergency situation under COVID-19 (more details are provided in annex 1); and ensuring that adequate medical waste handling and disposal procedures are in place if project workers is to be involved in health care facilities. Train workers, communities and vulnerable groups in contact with project's workers on specific communicable diseases and

Issues/ Elements	Risks/Impacts	Mitigation measure
		occupational health and safety guidelines to follow during COVID-19 pandemic in line with the Government, WB and WHO guidelines and protocols The project will have two GMs, one for project workers and other for the project to report on issues of concerns.
Waste hazards (C4W component 2)	Inadequate medical wastes and chemical wastes management at health care facilities can have a significant impact on the environment and human health. Misuse of pesticides, toxic agrochemicals, and preservatives.	MoF in coordination with each health service which support short-term employment prepare an ICWMP to be implemented at the medical facility (Template for ICWMP is presented in annex 2). MoF will conduct a risk assessment of site safety hazards where hazardous chemicals and pesticides will be used and design and implement measures specific to mitigate the hazards including manage agriculture-related effluents risks and preparation of PMP and guidelines for use of preservatives and hazardous chemicals, where applicable (Templates are present in annex 3-A and annex 3-B). MoF should ensure presence of Emergency Response Plan (ERP)/measures in place. If not exist, the agriculture NGOs and health facilities will be responsible for preparing the ERP/measures that is commensurate with the risk levels in coordination with the relevant local authorities to track and respond to accidents, incidents, near misses and fatalities. The key elements of an ERP are defined in ESS 4 Community Health and Safety.
Life and Fire Safety	Risk of fire in the existing buildings accessible to the project workers and public where the project activities will be conducted is unlikely but possible. Fire hazard constitute of all factors present in a building that	MoF should ensure: All existing buildings accessible to the project workers and public should implement life and fire Safety requirements by incorporating all local building codes and fire department regulations.

Issues/ Elements	Risks/Impacts	Mitigation measure
	can cause ignition (start fire). The fire hazard can cause partial or complete collapse of the building, and incapacitation of building operations.	A life and fire safety review of the building should be conducted by a suitably qualified professional and ensure that Operation and Maintenance (O&M) practices meet all local building codes and fire department regulations. This assessment may be performed by the competent authorities or by a third party if MoH has limited capacity. The General EHS Guidelines refers to US National Fire Protection Codes (NFPA) as one example of an internationally accepted L&FS standard and may be used to document compliance with the Life and Fire Safety objectives outlined in WBG General EHS Guidelines.
Stakeholder consultations & mechanisms to assure transparent and equitable provision of employment or cash transfers. (all project activities)	Inadequate consultations with relevant stakeholders during the preparation and finalization of beneficiaries. Eligibility criteria for selecting beneficiaries excludes key marginalized and vulnerable groups. No mechanism for stakeholders to raise concerns & objections against selection process.	Consultations processes would be initiated with relevant stakeholders during the preparation and finalization of the project's beneficiaries. Eligibility Criteria & beneficiary selection process would be formulated and finalized in a transparent manner in consultation with key stakeholders. Operational GM for the public (project GRM) will be ensured to raise any concerns regarding beneficiary selection within a set time period before finalizing the beneficiaries.
Access to Information (all project activities)	Project related information details regarding eligibility criteria and application procedures not reaching vulnerable, elderly, people with disabilities, etc. Vulnerable groups (elderly, disabled, those in remote locations etc.) may not have access to internet nor know how to use internet to access information about the project.	Project will take special measures such as working with existing social workers at MoSD and networks to reach and disseminate project information to home of vulnerable groups (elderly, disabled etc.) following appropriate social distancing protocols who do not have access to mainstream media or internet. Information will be communicated in a user-friendly format even elderly, people with disabilities etc. could easily understand.

Issues/ Elements	Risks/Impacts	Mitigation measure
	Information disseminated is not user-friendly format, hence vulnerable groups are not able to understand project details and procedures.	The contacts of ESO will be available for people to call and obtain clarifications in addition to MoF website that will have all pertinent information.
Facilities to receive payments for cash transfers and C4W	Vulnerable groups may not have banks accounts and may lack the knowledge to open bank accounts. Further they may be challenged in terms traveling to banks to open bank accounts and to withdraw money due to their vulnerabilities which would also be compounded by the travel restrictions.	The MoF and NGOs will facilitate opening of the bank accounts and also delivery of the project's payments for cash transfers and C4W beneficiaries, respectively.
Lack of documentation necessary to proof eligibility for cash transfers and C4W	Vulnerable groups (especially, elderly, disabled etc.) may lack the necessary evidence and the required documentation to prove their eligibility. These groups may be challenged in terms of contacting or traveling to meet relevant authorities to obtain missing documentations.	The MoF in conjunction with MoSD, MoL and PFESP will establish mechanisms to support vulnerable groups to obtain missing documentation to process their applications. In addition, the project design will include alternate options for vulnerable groups to prove their eligibility if they are not able to furnish the required documentation.
GBV/SEA/SH (all project activities)	Risks of GBV, SEA and SH are expected to be increased as a result from the emergency situations due to COVID-19 pandemic and may also increase as a result of increased interactions between the social workers who will support vulnerable groups with disabilities and elderly populations during home visits, especially for homes without any male presence. There are also risks of project workers being harassed by unhappy claimants while working at respective ministry or agency or NGO.	The MoF will follow the measures for addressing GBV, SEA/SH – such as the signing of enforceable workers' codes of conduct (CoC), a sample CoC is presented in the Labor Management Procedures (LMP) prepared for the project. The MoF will embed culturally sensitives messaging in the delivery of the cash transfers to promote healthy conflict resolution and stress management at household level. It will also explore the use of behavioral insights, for example by labeling the transfers and top-ups in a way that values the redistribution of care work among household members. The MoF will train all project workers on

Issues/ Elements	Risks/Impacts	Mitigation measure
		GBV/SEA/SH prevention measures and protocols and provide awareness for communities in contact with project workers on risk of GBV/ SEA/SH and domestic violence and on prevention measures. All project workers and communities in contact with project workers will be made aware of the GRM available for the workers and the project and will also be able to lodge complaints to the special referral pathways for grievances on GBV, SEA, SH.
labor and working conditions (all project activities)	Terms and conditions of employments are not in accordance with the requirements of national law and ESS2. Risk of stress, fatigue or burnout of staff of PCU, MoL, MoSD and PFESP due to overworking to manage the excessive demand given the urgency to process a large number of applications.	MoF and NGOs will implement LMP prepared for the project as separate document for mitigating the labor and working conditions including applying terms and condition of employment; non-discrimination and equal opportunities; prohibition of forced labor & child labor; terms and conditions for overtime, unpaid salary in part or in full, minimum age, rights of association code of conduct (CoC) and workers' rights in a manner consistent with national laws and regulations and ESS2. The ESO at MoF-PCU will review to ensure that terms and conditions of all project's workers are in accordance with the requirements of national law and ESS2 as indicated in the LMP. The project's workers will be able to lodge their complaints, concerns, difficulties to the Workers' GM.
Social conflicts and tensions (cash transfer and C4W)	With the transfer of cash to beneficiaries, social tensions could arise due to community groups or individuals being dissatisfied due to not been selected or due to others being selected. Any lapses, bottlenecks or delays in the process or timely	MoF will implement the SEP efficiently and effectively to obtain community feedback and ensure their concerns are addressed throughout the project. Social workers and communities including vulnerable groups in contact with project workers, as part of the general communication, should adhere to the

Issues/ Elements	Risks/Impacts	Mitigation measure
	receipt of cash could lead to a social up rise. Risk of social tensions and anger due to concerns about infection spread to the communities when visiting homes of vulnerable groups by social workers engaged with NGOs. Further any GBV, SEA and SH issues could also lead to a social up rise.	standard COVID-19 prevention practices and social distancing (see annex 1 for guidelines on policies for public works under COVID-19) including practicing proper hygiene, masking, other safety precautions and social distancing measures, as well as including measure to prevent issues of GBV, SEA and SH. The project would build in principles of inclusion and transparency into every aspect of the project from start to end. Operational GRM systems will be ensured from the project start allowing the public to raise any concerns regards beneficiary selection within a set time period before finalizing the beneficiaries.
social exclusion or inequity (cash transfer and C4W)	Improper targeting could create and/or exacerbate socio economic disparities.	Ensure beneficiary selection processes are carried out in transparent manner. Ensure access to information and transparency in decisions, undertake public consultation and implement outreach and engagement activities and information dissemination. Establish and create awareness on grievance redress mechanism

5.4 Gender Inclusion

91. The project will also address issues of access and safety for women. Under Component 2, the project will introduce specific measures to reinforce women's access to potential job opportunities and ensure equal representation of female beneficiaries to ensure that women will be equally able to access the C4W benefits. Indirect project beneficiaries will also include vulnerable people directly benefiting from services provided under C4W projects (e.g., those affected by the COVID-19 disease, those being the sick, the disabled, elderly, children, and women).

CHAPTER SIX: PROCEDURES TO ADDRESS ENVIRONMENTAL AND SOCIAL ISSUES

92. This section defines steps, actions and responsibilities for screening potential environmental and social issues and classifying risk levels.

6.1 The Environmental and Social screening Process

The ESO at PCU will use screening and management process as guided in this ESMF to reduce ESHS risk and identify the required EA or mitigation measures. The procedures are applicable to the NGOs from a variety of sectors identified to be eligible under the project including agriculture, education, health service, light industry, etc. where workers will be involved. The purpose of this screening process is to determine which activities are likely to have negative environmental and social impacts to; determine the level of required environmental assessment; determine appropriate mitigation measures for activities with adverse impacts; and incorporate mitigation measures into the subprojects as appropriate. The extent of environmental work that might be required prior to the commencement of the new subprojects or enrollment of benefiting workers will depend on the outcome of the screening process described below.

93. Public consultations will take place during the environmental and social screening process, and the input from the public consultations will be reflected in the design of the mitigation and monitoring measures. The screening process shall be conducted according to the following steps:

Step1: Screening including Checking Eligibility of subprojects

94. At this stage the sub-projects will be subjected to screening process by the ESO to check their eligibility for the project financing. The following activities will not be eligible for this project financing (Exclusion list):
    - Civil works that include construction of new facilities or rehabilitation of existing ones
    - Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts;
    - Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to treatment of COVID-19 cases;
    - Have adverse social impacts and may give rise to significant social conflict or would require Free Prior Informed Consent
    - Activities that may affect lands or rights of people or other vulnerable minorities;
    - Activities that may involve resettlement impacts or land acquisition, adverse impacts on cultural heritage.
    - Activities that may involve civil works including new construction, expansion, upgrading or rehabilitation of healthcare facilities and/or associated waste management facilities such as a sanitary landfill, incinerator, or wastewater treatment plant for healthcare waste disposal
95. In checking the eligibility of the sub projects, the questions in the Subproject Eligibility Screening Checklist (Annex 5- Part 1) would be answered as “Yes” or “No”. If the answer to any one of the questions is ‘Yes’, then the subproject will be redesigned to be acceptable or stopped if redesigning is not possible. If on the contrary the answer is ‘No’ for all the above questions, then one must proceed to the next step.

96. Furthermore, ESO would assess the significance of potential impacts using environmental and social impact rating checklist below. The checklist must be filled, and number of potential impacts marked as

None, Low, Medium, High and Unknown and will be used to determine individual and the overall impact rating of the sub-project. The table below is a guidance to determine what action would be taken before proceeding to the next level based on the results.

Rating and classification of potential impacts of Sub-projects

For sub-projects with no impact (All impact rating becomes 'None')	These types of subprojects would be labeled as '**subprojects of no environmental concern'.** These types of sub-project without further delay have to be approved and cleared by MOF and the WB
For sub-projects with low and/or medium impact	These types of subprojects would be labeled as '**Sub-projects of medium environmental and social concern'.** In this case, **i**ncorporate potential mitigation measures into the design of the subprojects would be integrated and ESMP would be prepared.
Subprojects cause high potential impact (activities that will not be eligible for this project financing from the Exclusion list	These types of subprojects would be labeled as '**subprojects of high environmental and social concern'.** In this case, these sub-projects will not be financed by the project.

Step2: Screening including environmental and social actions/instruments

97. The ESO will complete the Environmental and Social Screening Form (Annex 5-Part 2) to facilitate identification of relevant ESSs and due diligence action/instruments. After analyzing data contained in the environmental and social screening form and having identified the right environmental category and hence scope of the environmental assessment required, the ESO will make a recommendation to MoF as to whether: (a) no ESIA will be required; (b) implementation of mitigation measures will be required such as preparing OHS plan or waste management plan or use of preservatives/hazardous procedures, or development of ESMP; or (c) a separate environmental impact assessment EIA will be carried out (such activities. will be excluded). In case of activities under (a) and (b) above, project environmental and social management plan (ESMP) or environmental and social plans will be proposed by the MoF as guided by this ESMF.

Step 3: Approval of the screening reports

98. At this stage environmental and social screening reports will be reviewed and approved by the MoF. If the sub-project has medium environmental and social concerns, MoF would ensure that all the necessary plans are prepared or all mitigation measures are incorporated in the ESMP before approval.

99. World Bank requires disclosure of the environmental assessment report and/or ESMP both in-country by the MOF and at WB's website.

6.2 Measures for addressing GBV, SEA/SH Risks and Impacts

100. Risk of GBV, SEA/SH under the Project are expected as a result from the emergency situations due to COVID-19 pandemic, and during selection of beneficiaries for sexual purposes, domestic violence due to economic hardships, and during home visits, especially in homes without any male presence. Project will implement a number of activities to prevent GBV, SEA/SH risks. In particular, World Bank Group's 'Technical Note on SEA/H for HNP COVID Response Operations,

https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/iasc_interim_guidance_on_covid-19_-_protection_from_sexual_exploitation_and_abuse.pdf, will be used as a guide towards the design and implementation of measures to prevent. These will involve:

- Awareness to communities in contact with project workers to specific issues women face during the pandemic, including safeguarding and responding to GBV and child abuse.
- Publicly post or otherwise disseminate messages clearly prohibiting GBV, SEA/SH and providing the contact information for the Project GRM, should there be any cases or suspicion of sexual exploitation and abuse.
- Prepare and implement and train all workers on GBV prevention and child protection protocols during community engagement activities. Identify and prepare a list of GBV psychosocial support services that are available to support victims/survivors.
- Codes of Conduct and provisions related to GBV and SEA/SH will be incorporated into the contracts with the NGOs including sanctions. The MoF will have the responsibility for monitoring the NGOs' compliance as mentioned in step 2 above.
- The Code of Conduct shall be signed by each worker/employee, as a first line mitigation measure, to indicate that they have: (i) received a copy of the code; (ii) had the code explained to them; (iii) acknowledged that adherence to this Code of Conduct is a condition of employment; and (iv) understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities. A sample CoC is presented in the Labor Management Procedures (LMP) prepared for the project.
- Ensure that the Project GRM will have a mechanism for confidential reporting with safe and ethical documenting of GBV issues.

6.3 Measures for management of Occupational Health and Safety

101. As detailed out in the Labor Management Procedure for the Project, all potential risks to project workers' health and safety will be identified by all parties who employs workers and develop and implement procedures to establish and maintain a safe working environment to prevent hazards to project workers, including workplaces, machinery, equipment and processes under their control and sets out measures for emergency prevention and preparedness and response arrangements to emergency situations;

102. All workers, regardless of specific exposure risks, it is always a good practice to do the following:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 70% alcohol. Always wash hands that are visibly soiled.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Practice good respiratory etiquette, including covering coughs and sneezes
- Avoid close contact with people who are sick.
- Stay home if sick.
- Recognize personal risk factors. According to the WHO, certain people, including older adults and those with underlying conditions such as heart or lung disease or diabetes, are at higher risk for developing more serious complications from COVID-19.

103. In order to ensure workers' Health and Safety procedures, project workers will receive OHS training including protection against COVID-19 at the beginning of their employment. Training will cover the relevant aspects of OHS associated with daily work, including the ability to stop work without imminent

danger and respond to emergency situations. Training records will be kept on file. These records will include a description of the training, the number of hours of training provided, training attendance records, and results of evaluations.

6.4 Environmental and Social Management Plan

104. An Environmental and Social Management Plan (ESMP), if required, for the proposed project is intended to ensure implementation of environmental and social management of its activities. Ideally the ESMP should contain the following:

- Summary of the potential impacts of the subproject;
- Description of the recommended mitigation measures;
- Description of monitoring activities and plan;
- Institutional arrangement for implementation and training;
- Implementation Schedule of the actions to be taken and reporting procedures;
- Program for monitoring; and
- Estimated related costs and sources of funds

105. Example/Template for Generic ESMP matrix is provided in annex 6. The indicative outline of an ESMP, can be found in the ESF guidance notes (page 33).

6.5 Management of E & S During CERC Component Implementation

106. Component 4 of the project is a Contingent Emergency Response Component (CERC). The project ESMF includes a list of typical negative activities associated with CERC implementation that is presented in the World Bank's template for CERC Operational Manuals and summarized in annex 7. The ESMF will be updated depending on the scope of the activities included in the CERC component. In addition, a CERC Operations Manual will be prepared during project implementation to govern the operation of the component, this document will be aligned with the ESMF at the time of preparation and include provisions to ensure environmental and social due diligence in line with the requirements of the ESF.

CHAPTER SEVEN: STAKEHOLDER ENGAGEMENT, GRIEVANCE MECHANISM AND INFORMATION DISCLOSURE

7.1 Consultation and Disclosure

107. Public consultations are critical in preparing effective and sustainable sub-projects activities within C4W component and cash transfer component. This requirement supports the participatory planning process as required by the World Bank and the national environmental assessment regulations. It is important that beneficiaries are involved in the project cycle, once they are selected. The same applies to relevant stakeholders.

108. For sub-project activities, the first step is to hold consultations with the local communities and all other interested/affected parties during the selection process of sub-projects. Consultations with stakeholders were conducted according to the SEP.

109. The SEP for the Restructuring and the AF was updated and disclosed in November 10th, 2021. The update includes: the revised scope in line with the restructuring and AF and accompanying E&S risks and mitigation measures; identification of additional stakeholders; a summary of the public consultation meetings held for restructuring and AF; and, new needs for stakeholder engagement and information disclosure (in line with the restructuring and AF) identified during the stakeholder consultations. MOF has conducted several consultation meetings with project's stakeholders under the project's Additional Finance and Restructuring activities. Participants represented different institutions including related ministries and governmental authorities such as, MoL, MoSD, MoF, PFESP, nineteen NGOs working in the sector of education, health, social services, agriculture, women, youth and the disabled people, in the West Bank. A list of persons consulted and met is include in the SEP for AF. The SEP will be implemented throughout the project lifecycle. Being a 'living' document, the SEP may be updated periodically during project implementation and as subproject locations become known in consultation with the Bank.

110. Five public consultations meetings for the parent and AF were conducted (three meetings virtually and one meeting face to face) throughout March, April, August and September 2021 as follows:

111.

112. Table below summarizes the consultation workshops for parent project and Project restructuring and Additional Financing.

#	Date	Consultation workshop	Number of participant	Meeting mechanism
1	March 29th , 2021	Emergency Cash transfer component for the parent project	57 "ministries, NGOs, municipalities, Unions and Individuals"	Conducted virtually through zoom technology
2	Aprile 8th, 2021	Cash for Work Component for the parent project	250 "ministries, municipalities, Unions and NGOs working in the sector of education, health, social services, agriculture, women, youth	Conducted virtually through zoom technology

			and the disabled people,	
3	August 16th, 2021	Cash for work component and subcomponent 1.2 for the AF	50 "ministries, PFESP and NGOs working in the sector of education, health, social services, agriculture, women, youth and the disabled people.	Face to face meeting in ministry of finance
4	August 31th ,2021	Cash for work component for the AF	35 "MoI, MoSD, MoF and the selected NGOs to carry out this component.	Face to face meeting in Al Karmel Hotel.
5	September 6th, 2021	Emergency Cash Transfer for project restructuring	"MoL, MoSD, MoF and chamber of commerce-Gaza, Joint Committee to count damages of Gaza War, Businessmen Association-Gaza and other private sector representatives.	Conducted virtually through zoom technology

113.

114. A detailed description of the public meetings and additional engagement activities are provided in the project's SEP.

115. To facilitate meaningful consultations, MoF should provide all the relevant material and information in a timely manner, and in a form and language that are understandable. The location of the relevant documents should be advertised through commonly used media. Depending on the public interest in the potential impacts of the sub projects, a consultation session may be required to better convey concerns.

116. To fulfill the requirements of ESS10, MoF has prepared Stakeholder Engagement Plan (SEP). The purpose of SEP is to explain how Stakeholder engagement will be practiced throughout the project life cycle and which methods will be used as part of the process; as well as to outline the responsibilities of MoF in the implementation of stakeholder engagement activities. Stakeholder engagement shall be carried out in compliance with the Technical Note on Public Consultations and Stakeholder Engagement in WBG-supported operations during COVID-19 (https://biwta.portal.gov.bd/sites/default/files/files/biwta.portal.gov.bd/page/f3ca1ff6_95b0_4606_849f_2c0844e455bc/2020-10-01-11-04-717aa8e02835a7e778b2fff46f531a8c.pdf.). A detailed description of the consultation activities is provided in the SEP prepared for the project. The SEP prepared for the parent project has been updated in line with the requirements of the AF and will be used as the AF SEP. Two public consultations for the AF and for the restructuring activities were

conducted in August 16 and September 6, 2021 and have been reflected in the updated SEP. SEP will be updated based on the prepared SEP as soon as the specific project component/sub-projects, stakeholder groups, and schedule of activities are known.

117. The MoF and the partner Ministries will disclose on their websites; MoL website: https://mol.ps/mol/, PFESP website: https://pfesp.ps/ and MoSD website: http://www.mosa.pna.ps/ project information and all key documentations, in addition to the updated SEP disclosed on October 5, 2021, the ESMF and LMP to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The information will be disclosed in English and Arabic language, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, women, mobility, accessibility).

118. The disclosed SEP includes information on: (i) stakeholder engagement process, highlighting the ways in which stakeholders can participate; (ii) time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported and; (iii) the process and means by which grievances can be raised and will be addressed.

7.2 Grievance Mechanism

119. The project hastwo grievance mechanisms. One for labor-related grievance and the other for general project related grievances. The project GM will include special referral pathways for GBV, SEA and SH grievances.

120. The project GM was established in each partner Ministry/Agency (MoF, MoSD & MoL and PSESP) and information about the GM has been disseminated to affected parties during consultations. The GM also includes features to accept and address potential SEA/SH related complaints, including referral mechanisms.Since the establishment of the project's GM, 132 complaints relevant to the Cash Transfer Component were received and resolved within the time frame described in Project's SEP.

121. For Cash for Work component, the PFESP launched a GM system on itsweb site. 37 complaints were received and resolved, whereas part of the complaints consisted of inquiries about the project eligible criteria while others were0 not relevant to the project. A detailed description of the GM is provided in the project's SEP.

122. MOl and MoSD established beneficiary surveys and inquiry systems to ensure inclusion of eligible beneficiaries and vulnerable groups. More than 3000 inquiries were received and answered.

123.

124. Labor GM: Each selected NGOs should provide and apply GM to restore dignity and empower beneficiaries, discourage corruption and sexual abuse, increase transparency, and ensure adherence to "DO No Harm Principle". The NGOs provided their GM system within the bidding documents, clear labor GM for the workers who will be employed or engaged in connection with the Project. The selected NGOs will put in place a Grievance Mechanism for their workers to lodge their complaints, concerns, difficulties. The GM will include special referral pathways for workers' grievances on GBV and SEA/SH. If small civil works will be involved during the project's lifetime, the implementing entities will require contractors to develop and implement a grievance mechanism for their workforce prior to the start of civil works.

125. This grievance mechanism also addresses child labor, GBV and sexual harassment related grievances. As a result, it develops features to accept and respond to the anonymous complaints. The anonymity of the complaints is communicated to all affected parties during the consultation. Selected NGOs will be requested to inform the workers about the available tools to lodge grievances such as telephone number and email. A GRM staff will be assigned to receive and handle complaints related to the project in every selected NGO. The responsibility of the GRM staff and the complaints mechanism are described in the SEP.

126. The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed. If small civil works will be involved during the project's lifetime, the implementing entities will monitor the contractors' recording and resolution of grievances, and report these in the progress reports

127. Project GM: Project-level grievance redress mechanisms has been established in each partner Ministry/Agency (MoF, MoSD & MoL and PSESP) as described and detailed in the Stakeholder Engagement Plan (SEP) which was updated for AF and disclosed in November 10th , 2021. Affected parties who believe that they are adversely affected by the project may submit complaints to the project's GM. Mechanisms for lodging complaints at each ministry, including phone number, GM email and electronic form on ministries website, are detailed under sections 6.3.1 and 6.3.2 in the SEP. In addition, the project GM will also be used for their direct workers to raise and resolve workplace-related concerns including those that are related to GBV, SEA and SH with the same principles and provisions for the Labor GM mentioned above. The persons responsible for managing complaints in each ministry will be instructed to liaise with the MoF-PCU to inquire into any complaints or grievances related to the Project. The ESO at PCU will provide the needed information or investigation into the complaint to the persons responsible at the ministry level. All procedures for filing and responding to complaints will follow the procedures of the GM manual to be prepared for the project. Detailed M measures and procedures are described under section 6.3 in the SEP.

Gender Based Violence Grievances

128. The GM system includes special referral pathways for the GBV complaints and grievances including grievances on Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). Information about the existence of the GBV grievance mechanism will be communicated to all stakeholders through different methods (i.e., public consultations, posters and leaflets, local radios and social media). Training will also be provided by a GBV expert for the ESO on detection of cases of GBV and handling of inquiries, complaints and grievances related to GBV. Staff assigned for handling complaints at the MoSD and MoL will also be trained on detecting, receiving and handling GBV. Relevant NGO staff, responsible for implementing Cash for Work activities, will also be trained.

129. The following sexual harassment and sexual abuse grievance procedures, in line with the MoSD GBV regulations will be followed:

- Refer the victim to a specialized gender unit at the MoSD or the Ministry of Women Affairs to provide support.
- In the case the survivor decides to seek justice the following procedures will be followed after obtaining the survivors' permission:

130. The ESO will be assigned to receive and handle SEA/SH complaints. A special telephone number and email will be designated for lodging SEA/SH complaints (email address (pcu.eso@pmof.ps) and telephone number (0593071711). Telephone information line, email address and procedures will be communicated to beneficiaries during consultation and induction sessions. The telephone number can also be used by employees/workers to discuss questions or concerns about the harassment without having to express an identity. The ESO will be trained to deal with SH issues and to explain what action

can be taken by employees.

131. Follow clear procedure for addressing the SEA/SH that will include the following steps:

i. private interview with the complainant and articulate the allegations in writing;
ii. investigate the claim. Investigation can be done by a special committee for the prevention of sexual harassment. The committee should be gender balanced and could include a member of senior management, and trained sexual harassment staff member. Investigation will be conducted in total confidentiality to prevent any humiliation of the complainant.
iii. a finding is made as whether the complaint is substantiated;
iv. a written report documenting the investigation process, evidence, findings and recommended outcome(s) is submitted to the Head of PMU/Minister of Labor/Minister of Social Development.
v. the Head of the PMU/Minister of Labor/Minister of Social Development implement the recommended outcome(s) or decide on an alternative course of action.
vi. determine the forms of disciplinary action and sanction. Disciplinary and sanction should be included in the organization regulations and/or the labor agreement.
vii. refer the victim to a specialized gender unit at the MoSD or the Ministry of Women Affairs to provide support.

The GM mechanism for the parent project will also be used for the AF and details about the GM are included in the SEP.

CHAPTER EIGHT: INSTITUTIONAL ARRANGEMENTS, RESPONSIBILITIES AND CAPACITY BUILDING REQUIREMENTS

8.1 Institutional Arrangement and Responsibilities

132. The overall project implementation arrangements include two levels, as set out in the schemata below. The MoF will act as the formal Project Counterpart (PC) to the project and as the overall implementing entity through its Project Coordination Unit (PCU), together with the MoL and the MoSD for Component 1 and the MoL/PFESP for Component 2 For component 1, MoL will be responsible for defining the eligibility criteria for the selection of beneficiaries, running program communications, and finalizing the beneficiary list. This will be discussed and agreed upon with the project partners – MoSD and MoF. Implementation of Component 2 will be handled by selected NGOs based on the selection criteria for both NGOs and beneficiaries as described in the Project Operation Manual (POM) prepared by MoF; after selecting the NGOs, the MoF will sign sub-project grant agreements, in which the PFESP will be identified as the Project Technical Unit (PTU). In addition, there will be separate service provider contracts generated for other activities to be undertaken under the project, namely for the management and capacity building, Component 3. The AF will have the same implementing partners.

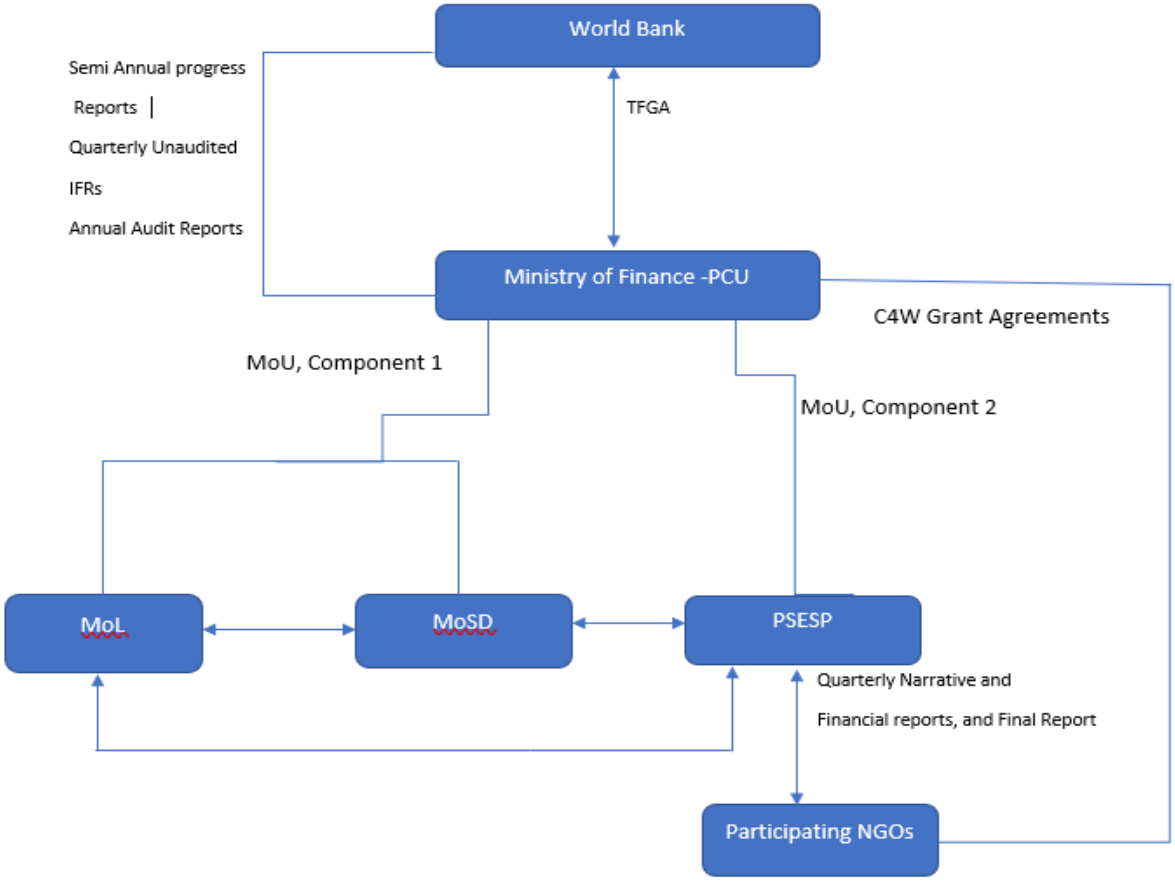


Figure 1: Scheme of the Implementation Arrangement and Functional Relationships between Key Stakeholders

8.1.1 Responsibilities of the MoF-PCU

133. Overall management and monitoring, including:

- Project design and associated preparation work, including safeguard requirements;
- Stakeholder consultations and ongoing coordination;
- Concluding MoUs with the MoL, MoSD, and PFESP;
- Preparation, submission, and endorsement by the MoF of the Withdrawal Applications indicating that funds be deposited directly in the designated accounts
- Preparation and submission to the Bank TTL Quarterly and Annual Work planning;
- Preparation and submission to the Bank TTL Semi-annual Progress Reports;
- Preparation and submission to the Bank of Unaudited Quarterly interim unaudited financial reports;
- Project procurement, including selection and contracting of participating NGOs;
- Financial management and control of project funds including sub-grant disbursement;
- Day-to-day project management;
- Supervising PFESP on the C4W sub-projects;
- Monitoring and Evaluation.
- Compliance with E&S requirements including regular reporting

8.1.2 Responsibilities of the Ministry of Labor under Subcomponent 1.1 and Component 4

134. The MoL, working as the front office, is expected to:

- Act as the face of the program;
- Work as the front office for the program implementation;
- Use their portal to receive additional application for component 1.
- Define criteria for selection of beneficiaries in consultation with MoSD and MoF-PCU;
- Handle the communication of Subcomponent 1.1 and Component 4.;
- Finalize the beneficiary list.
- Support the MoSD in the cross-verification and the field audit of the beneficiary's data.

8.1.3 Responsibilities of the MoSD under Subcomponent 1.1, 1.2 and Component 4

135. The MoSD, working as a back office, is expected to:

- Utilize the CTP Information system to provide timely transfers;
- Curate the data of the beneficiaries (data cleaning and data entry);
- Work as data administrator and system developer;
- Manage data entry and cross-verification with other systems;
- Trigger and administer payments to selected households;
- Prepare and submit the CTP waiting list of beneficiaries, around 20% of the total number of beneficiaries under Subcomponent 1.1.

8.1.4 Responsibilities of the PFESP under Component 2

136. The PFESP will be engaged in the C4W component and will act as the PTU to:

- Develop/update the grants manual to fit the program.

- Identify NGOs to carry out the Cash for Work component in conjunction with the MoF-PCU and in accordance with the criteria, terms, and guidelines as detailed in the Project Operation Manual;
- Receive participating NGOs' subproject proposals.
- In conjunction with the MoF, select the best NGO proposals that would fulfil the project indicators and requirements and, more importantly, fit the eligibility criteria.
- In conjunction with the MoF, lead the communication activities.
- Track day-to-day activities implemented by the selected NGOs, providing the MoF with quarterly narrative and financial reports in addition to the final report.

8.2 Institutional arrangements for implementation of the ESMF

The MoF through PCU will be responsible for full implementation of the ESMF and compliance thereof. The ESO hired (Dec 27, 2020) at PCU will take the lead responsibility in ensuring implementation of all steps presented in the ESMF, the LMP and the SEP. The ESO will also be responsible for monitoring and reporting on compliance of due diligence mechanisms set forth in the ESMF and preparation of quarterly compliance summaries and formally communicating to the World Bank on environmental and social safeguard matters. In addition, the ESO is expected to create awareness among all implementing partners including MoSD, MoL, PFESP and NGOs on ESMF compliance, and any staff training necessary for its effective implementation. MoF has also hired a Health and Safety Specialist (HSS) on Feb 21, 2021 who will be responsible for preparing, monitoring and reporting the OHS requirements throughout the project implementation. For incident reporting, MoF shall notify of any incident or accident within 24 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established following the initial notification.

137. MoF has prepared and disclosed the parent's project SEP in June 2020. Following his recruitment, the ESO has prepared and disclosed the project's ES instruments in May 2021 including the LMP and the ESMF. Both the ESCP and the SEP were cleared and disclosed on the MoF website and WB external website. For the project's restructuring and AF, the MoF has updated and disclosed the ESCP and SEP in November 10, 2021. The ESMF and LMP for the Restructuring and the AF will be disclosed by project effectiveness.

138. For component 2, each individual NGO undertaking activities financed by the project will assign one staff member who will be responsible for liaising with the ESO and HSS at PCU on ESMF implementation throughout the life of the project at that specific NGO. Implementation of this ESMF will include the following activities, to be undertaken by the ESO and HSS working closely with the individual NGOs:

- **Screening.** All activities undertaken by the project will be screened using the form in annex 5 (including negative list for the project activities and the CERC, annex 7) in order to exclude certain high or substantial risk activities, identify potential ES issues, and required ES instruments including mitigation measures and plans. Copies of each of these screening forms will be kept at the PCU and individual NGOs. The PCU's periodic report to the Bank will include copies of each screening undertaken during the subject quarter.

- **ES Instruments:** The ESO and HSS at PCU and in coordination with the selected NGOs/health clinics will prepare the necessary ES instruments for each of the activities financed under the project. The scope of this Project includes following types of ES instruments:

- **ESMPs:** ESMPs will be prepared based on the template present in the annex 6
- **ICWMPs:** ICWMPs will developed based on template provided in Annex 2.
- **Pest Management Plan (PMP) and use of hazardous chemicals and preservatives:** will be developed per template provided in Annex 3-A and 3-B.
- **SEP:** The MoF has prepared a SEP for the project and it is applicable to all project financed activities. MoF and the key project partners including MoSD, MoL and PFESP will follow the guidelines mentioned in the SEP to ensure all stakeholders, affected people, local authorities, and the general public are aware of the project activities and have access to GRMs, and other important information channels.

8.3 Results Monitoring and Evaluation Arrangements

139. Monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts of the project and the effectiveness of mitigation measures. This allows the Project to evaluate the success of mitigation measures as part of project supervision and allows corrective action to be taken when needed. The ESO and HSS will be responsible for monitoring the implementation of the ES instruments including the identified mitigation measures and plans per the screening process. Relevant practical indicators to enable effective monitoring will be identified by the ESO and HSS such as number of mitigation measures implemented; functional GM system is in place; complaints received have been completed for a reasonable period; using the results of E&S monitoring to guide subsequent implementation, stakeholders concerns during consultations on possible impacts of sub-project activities, E&S monitoring reports are produced on time according to the ESCP, etc. Monitoring is to be conducted on continuous basis. The flow of monitoring proceeds is presented in Table 9:

Table 9: The project Monitoring, Evaluation, and Reporting Framework

Type of M&E	Who	Description
Constant monitoring	Focal point at NGO/Clinic	The focal point at NGO/Clinic which support short-term employment will be responsible for implementing, monitoring and reporting on a monthly basis to the ESO and HSS at the PCU the environmental and social requirements as per the environmental and social instruments
Monthly monitoring reports	ESO and HSS	The ESO and HSS will compile the monthly report received from the focal points at NGOs/Clinics and address all environmental and social issues relevant to the project in a monthly monitoring report and submit to the PCU coordinator.
Quarterly Progress Report (QPR)	ESO/MOF, From MOF to the World Bank	The ESO and HSS will prepare a quarterly progress report and submit it to the PCU coordinator. The coordinator will submit this report to the World Bank as per the ESCP

8.4 Roles and Responsibility of World Bank

140. The World Bank project environmental and social safeguards team will provide close supervision and technical support in the implementation of the ESMF, SEP and LMP. The specific tasks will include:
141. Ensure regular missions to review overall safeguard performance and provide further implementation support.
- Share knowledge on technologies and best practices
- Provide training on ESF requirements for the project.

142. The ESO and HSS at PCU in addition to the relevant project implementing partners will be trained by the environmental and social Specialists WB project team on the ESF and ESMF, SEP and LMP implementation.

8.5 Capacity building requirements for Implementation of ESF

The parent project has been active since May 2020 but has faced critical implementation challenges. Specifically, for E&S MoF met delays in completing the requirements included in the parent project's Environmental and Social Commitment Plan (ESCP) including clearance and disclosure of the (Environmental and Social Management Framework (ESMF) and Labor Management Procedures (LMP), updating of the Stakeholder Engagement Plan (SEP), and staffing of the PCU with environmental and social officer and health and safety specialist according to the agreed timeframe. MoF also disbursed US$ 12.4 million as part of the cash transfers prior to preparing and disclosing the ESF instruments. In line with ESF requirements, MoF was therefore requested to conduct an environmental and social audit of the already disbursed activities (under Components 1 and 4) to i. review the management of environmental and social issues for the disbursed activities, ii assess how the E&S management measures against the E&S commitments included in the parent project ESCP agreed between the government and the World Bank, iii. identify gaps (if any), and iv. recommend a corrective action plan (CAP) that needs to be implemented for the parent project and any additional financing activities so that moving forward, compliance with the World Bank ESF's requirements is ensured. The draft audit report, prepared by MoF's external auditor, was reviewed and cleared by the Bank and disclosed in country on September 21, 2021 and on the Bank's system on September 2021. Briefly, the audit found partially satisfactory compliance by the project regarding the E&S measures and recommended a corrective action plan (CAP) to enhance monitoring and reporting of E&S implementation; ensure awareness and proper implementation of the workers' code of conduct (CoC); ensure public consultation in line with the SEP; ensure proper functioning and monitoring of the grievance mechanism (GM); establishing a workers' GM; and enhancing the capacity of the PCU and the ESO in particular for E&S management. A commitment to implement the CAP is being included in the ESCP for the AF.

MoF recruited an Environmental and Social Officer (ESO) and Health and Safety Specialist (HSS) in December 2020. Since then, MoF has gained experience of using the ESF; however, further capacity building of the PIU's E&S personnel and other staff (e.g. procurement, project directors etc.), for proper understanding and implementation of and compliance with the ESF is required. These trainings will be delivered by the Bank and PIU E&S staff. A commitment regarding training/capacity building will be included in the ESCP and a training schedule will be agreed to between the PIU and the Bank.
143.

144. In addition to the ESO and HSS, the key project partners including MoSD, MoL and PFESP are to

attend capacity building programs, to be conducted by the World Bank E&S team. Training required are specified in the following table:

Training program	**TIMEFRAME**	**Target Audience**	**Conducted by**
World Bank ESF training	Completed within one month after AF project Effective date	ESO and HSS at PCU, MoL, MoSD, PFESP staff	WB E&S team
ESMF, SEP and LMP implementation training: to cover World Bank environmental and social management procedures, consultation and monitoring during project implementation and reporting	Completed within one month after AF project Effective Date	ESO and HSS at PCU, MoL, MoSD, PFESP staff	WB E&S team
Informing stakeholders about the available tools to lodge grievances such as telephone number and email, receiving and handle complaints, managing and sorting complaints, recording and tracking resolution of grievances in the complaints log, reporting on the received and handled complaints.	Completed by AF project Effective Date	ESO at PCU, MoL, MoSD, PFESP staff	WB E&S team
Promoting awareness and detection of cases of GBV/SEA/SH.	Completed by AF project Effective Date	ESO at PCU, MoL, MoSD, PFESP staff	WB E&S team
World Bank environmental and social management procedures, consultation, E&S monitoring during project implementation and reporting	The implementation has been started and will continue throughout project life period	Selected NGOs	ESO
Occupational Health and Safety training	The implementation has been started and will continue throughout project life period	All project workers	HSS and ESO

8.6 Budget and Resources for Implementation of ESF

145. The cost expected under this ESMF will cover the salaries for the ESO and HSS who will be

responsible for the implementation of the ESF. The Table below summarizes the estimated costs and schedules for the items associated with the implementation of the ESF. The ESO will also be responsible for the implementation of the SEP. The ESO will review the SEP every six months to determine if any changes to stakeholder categories or engagement activities are required. The budget will be revised accordingly.

Item	**Schedule**	**Cost (USD)**
Implement ESMF	Throughout project implementation	No additional cost, this is embedded in ESO and HSS cost
Salaries for ESO and HSS	Full-time throughout project Implementation	3 years @ 36,000 USD per year for each USD216,000
Monitoring the implementation of environmental and social measures through field visits to be conducted by the ESO and HSS	Transportation to NGOs through implementation	US 7,000
Training sessions for project partners	(NGOs, MoL, MoSD and PFESP) Project life 3 years	US 5,000
Consultation workshops	Through project implementation and close out	US 6,000
E&S audit	For project component	US 5,000
Assign focal points at NGOs/health clinics	Throughout project implementation	Embedded in NGO cost
Implementation SEP	Throughout project implementation	USD 23,000 (details are shown in the SEP)
Total		USD 262,000

ANNEXES

Annex 1: Guidance Note for public work under COVID-19 context

1. Public works programs are generally viewed as social safety net instruments and are used in diverse contexts across both low- and middle-income countries. Their dual objectives are to provide temporary employment while also generating or maintaining labor-intensive infrastructure projects and social services.
2. Conducting Component 2 activities entail OHS risks related to health services workplaces, fruit and vegetables, agricultural and processes under their control and sets out measures for emergency prevention and preparedness and response arrangements to emergency situations, exposure to pesticides, toxic agrochemicals, and preservatives in agriculture related NGOs. Health and safety risk of exposure to the virus among communities especially for the vulnerable groups during interactions with all workers of the project as associated with COVID-19 infection, especially if proper hygiene, safety precautions and social distancing measures are not adhered to. These include staff of PCU, MoL, MoSD, PFESP and NGOs and selected beneficiaries for C4W.

While conducting labor intensive public works under Component 3 entail occupational health and safety risk, generation of minor solid waste, management and disposal of waste, nuisance related to vibration and noise during installation activities.

Where both components works will entail many people working in the same space at any one time and sharing work tools. In these instances, just one misstep can lead to the quick spread of COVID-19, jeopardizing the well-being of participants.

3. The virus is thought to spread mainly from person to-person, including: (a) Between people who are in close contact with one another (within about 6 feet). (b) Through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

4. The following COVID-19 Safety Tips are recommended for implementers and participants of labor-intensive public work activities:

- Collaborate with health authorities to provide advice and guidance on how safely to work in a group,
- Ensure sick beneficiaries not to participate on the public work. Any person who is experiencing symptoms of COVID-19 (e.g., fever, cough, shortness of breath, sore throat, runny nose, body aches, chills or fatigue) should not be allowed to come to the public work site instead should be advised to seek medical care.

- Waive the requirement of beneficiaries' fingerprints to verify their identity. Use other methods for verification instead example national or program ID

- Establish guideline for social distancing at the work site. Social distancing is the practice of deliberately increasing the physical space between people to avoid spreading illness. In terms of COVID-19, social distancing best practices for public work activities can include:

    - Create smaller teams 10 or less people in a group and create staggered shifts to protect spread of COVID 19;
    - Allow younger people to work while keeping older people isolated;
    - Keeping at least 6 feet of distance from other people;
    - Discouraging people from shaking hands;
    - Participants should not share work tools and equipment;

- All participants should wear facemasks made from cloth;
- Develop and communicate guidance to participants on how to stay safe from COVID-19 and provide training on the same
- Develop and post posters to educate participants to help prevent the spread of COVID-19
- Provide water and soap at public work site and instruct participants to practice good hygiene. Participants should clean their hands often
- Ask participant targeted questions regarding their current health before they enter the public work site. If they answer yes to the following questions, supervisors should ask them to go home and not return to work until further notice:
- Have you been in contact with a person who has tested positive or is in the process of being tested for COVID-19?
- Have you or anyone you've been in contact with traveled outside of the village recently?
- Has a medical professional told you to self-quarantine?
- Are you having trouble breathing, or have you had flu-like symptoms within the past 48 hours (e.g., fever, cough, shortness of breath, sore throat, runny nose, body aches, chills or fatigue)?

- Instruct participants to practice good hygiene. Participants should clean their hands often, either with an alcohol-based hand sanitizer or soap and water. Hand sanitizers should contain at least 60%-95% alcohol, and participants should wash their hands with soap for at least 20 seconds. It's also a good idea to strategically place hand sanitizer and hand-washing stations around the public work site.
- Instruct participants to:

  - Avoid congregating and keep their distance from other workers where possible.
  - Avoid sharing tools and personal protective equipment (PPE).
  - Used PPE must be sanitized properly.
  - sanitizing tools and equipment that are used by participant

Annex 2: Infection Control and Waste Management Plan (ICWMP) Template

1 Introduction
1.1 Describe the project context and components;
1.2 Describe the targeted healthcare facility (HCF):

- Type: E.g. general hospital, clinics, inpatient/outpatient facility, medical laboratory;
- Special type of HCF in response to COVID-19: E.g. existing assets may be acquired to hold yet to-confirm cases for medical observation or isolation;
- Functions and requirement for the level infection control, e.g. biosafety levels;
- Location and associated facilities, including access, water supply, power supply;
- Capacity: beds

1.3 Describe the design requirements of the HCF, which may include specifications for general design and safety, separation of wards, heating, ventilation and air conditioning (HVAC), autoclave, and waste management facilities.

2. Infection Control and Waste Management
2.1 Overview of infection control and waste management in the HCF

- Type, source and volume of healthcare waste (HCW) generated in the HCF, including solid, liquid and air emissions (if significant);
- Classify and quantify the HCW (infectious waste, pathological waste, sharps, liquid and nonhazardous) following WGB EHS Guidelines for Healthcare Facilities and pertaining GIIP.
- Given the infectious nature of the novel coronavirus, some wastes that are traditionally classified as non-hazardous may be considered hazardous. It's likely the volume of waste will increase considerably given the number of admitted patients during COVID-19 outbreak. Special attention should be given to the identification, classification and quantification of the healthcare wastes.
- Describe the healthcare waste management system in the HCF, including material delivery, waste generation, handling, disinfection and sterilization, collection, storage, transport, and disposal and treatment works;
- Provide a flow chart of waste streams in the HCF if available; - Describe applicable performance levels and/or standards;
- Describe institutional arrangement, roles and responsibilities in the HCF for infection control and waste management.

2.2 Management Measures

- Waste minimization, reuse and recycling: HCF should consider practices and procedures to minimize waste generation, without sacrificing patient hygiene and safety consideration.
- Delivery and storage of specimen, samples, reagents, pharmaceuticals and medical supplies: HCF should adopt practice and procedures to minimize risks associated with delivering, receiving and storage of the hazardous medical goods.
- Waste segregation, packaging, color coding and labeling: HCF should strictly conduct waste segregation at the point of generation. Internationally adopted method for packaging, color coding and labeling the wastes should be followed.
- Onsite collection and transport: HCF should adopt practices and procedures to timely remove properly packaged and labelled wastes using designated trolleys/carts and routes. Disinfection of pertaining tools and spaces should be routinely conducted. Hygiene and safety of involved supporting medical workers such as cleaners should be ensured.
- Waste storage: A HCF should have multiple waste storage areas designed for different types of wastes. Their functions and sizes are determined at design stage. Proper maintenance and disinfection of the storage areas should be carried out. Existing reports suggest that during the COVID-19 outbreak, infectious wastes should be removed from HCF's storage area for disposal within 24 hours.

- Onsite waste treatment and disposal (e.g. an incinerator): Many HCFs have their own waste incineration facilities installed onsite. Due diligence of an existing incinerator should be conducted to examine its technical adequacy, process capacity, performance record, and operator's capacity. In case any gaps are discovered, corrective measures should be recommended. Good design, operational practices and internationally adopted emission standards for healthcare waste incinerator can be found in pertaining WBG EHS Guidelines and GIIP.
- Transportation and disposal at offsite waste management facilities: Not all HCF has adequate or well-performed incinerator onsite. Not all healthcare wastes are suitable for incineration. An onsite incinerator produces residuals after incineration. Hence offsite waste disposal facilities provided by local government or private sector are probably needed. These offsite waste management facilities may include incinerators, hazardous wastes landfill. In the same vein, due diligence of such external waste management facilities should be conducted to examine its technical adequacy, process capacity, performance record, and operator's capacity. In case any gaps are discovered, corrective measures should be recommended and agreed with the government or the private sector operators.
- Wastewater treatment: HCF wastewater is related to the hazardous waste management practices. Proper waste segregation and handling as discussed above should be conducted to minimize entry of solid waste into the wastewater stream. In case wastewater is discharged into municipal sewer sewerage system, the HCF should ensure that wastewater effluent comply with all applicable permits and standards, and the municipal wastewater treatment plant (WWTP) is capable of handling the type of effluent discharged. In cases where municipal sewage system is not in place, HCF should build and proper operate onsite primary and secondary wastewater treatment works, including disinfection. Residuals of the onsite wastewater treatment works, such as sludge, should be properly disposed of as well. There're also cases HCF wastewater is transported by trucks to a municipal wastewater treatment plant for treatment. Requirements on safe transportation, due diligence of WWTP in terms of its capacity and performance should be conducted.

3. Emergency Preparedness and Response Emergency incidents occurred in an HCF may include spillage, occupational exposure to infectious materials or radiation, accidental releases of infectious or hazardous substances to the environment, medical equipment failure, failure of solid waste and wastewater treatment facilities, and fire. These emergency events are likely to seriously affect medical workers, community, HCF's operation and the environment. Thus, an Emergency Response Plan (ERP) that is commensurate with the risk levels is recommended to be developed. The key elements of an ERP are defined in ESS 4 Community Health and Safety.

4. Institutional Arrangement and Capacity Building
A clearly defined institutional arrangement, roles and responsibilities should be included. A training plan with recurring training programs should be developed. The following aspects are recommended:

- Define roles and responsibilities along each link of the chain along the cradle-to-crave infection control and waste management process;
- Ensure adequate and qualified staff are in place, including those in charge of infection control and biosafety and waste management facility operation.
- Stress the chief of an HCF takes overall responsibility for infection control and waste management;
- Involve all relevant departments in an HCF, and build an intra-departmental team to manage, coordinate and regularly review the issues and performance;
- Establish an information management system to track and record the waste streams in HCF; and
- Capacity building and training should involve medical workers, waste management workers and cleaners. Third-party waste management service providers should be provided with relevant training as well.

Specific topics to be included in the training plan, as agreed in the ESCP, include, but are not limited to:

- Recommendations; - Laboratory biosafety guidance related to the COVID-19;

- Specimen collection and shipment; - Standard precautions for COVID-19 patients;
- Risk communication and community engagement; and
- WHO guidelines on quarantine and Palestinian Sanitary Regulations and Norms.

5. Monitoring and Reporting Many HCFs in developing countries face the challenge of inadequate monitoring and records of healthcare waste streams. HCF should establish an information management system to track and record the waste streams from the point of generation, segregation, packaging, temporary storage, transport carts/vehicles, to treatment facilities. HCF is encouraged to develop an IT based information management system should their technical and financial capacity allow.
As discussed above, the HCF chief takes overall responsibility, leads an intra-departmental team and regularly reviews issues and performance of the infection control and waste management practices in the HCF. Internal reporting and filing system should be in place.
Externally, reporting should be conducted per government and World Bank requirements.

Annex 3-A: Pest Management Plan (PMP) Template

The Pest Management Plan PMP is a comprehensive framework through which pest management is defined and accomplished. The plan should identify elements of the program to include health and environmental safety, pest identification, and pest management, as well as pesticide storage, transportation, use, and disposal. The PMP is to be used as a tool to reduce reliance on pesticides, enhance environmental protection, and maximize the use of integrated pest management techniques. The PMP should apply to all the activities and individuals working on the project or activity. The PMP should be consistent with IPM and emphasize that nonchemical control efforts will be used to the maximum extent possible before pesticides are used.

The PMP must contain pest management requirements; outline the resources necessary for surveillance and control; and describe the administrative, safety, and environmental requirements. The plan should provide guidance for operating and maintaining an effective pest management program/activity. Pests included in the plan may be weeds and other unwanted vegetation, crawling insects, and other vertebrate pests. Without control, these pests provoke plants' diseases. Adherence to the plan will ensure effective, economical, and environmentally acceptable pest management and will maintain compliance with pertinent laws and regulations.

The recommended structure of a PMP is presented in the following paragraphs:

0. Background which would outline (a) the *purpose* of the plan, (b) identify indicate *pest management authorities*, and (c) pest management program *objective*
1. Responsibilities of individuals (NGO manager, Operations Officer, and so on)
2. General information which should provide data on land use and soil, in the area where the pesticides are applied, climate, geomorphology, settlements in the area of concern, population, and so on, as well as inventory of land use and layout of facilities
3. Priority of pest management (for example, undesirable vegetation, vertebrate pests, and so on)
4. Integrated pest management

5.1 Principles of the integrated pest management are the following:

a) *Mechanical and physical control.* This type of control alters the environment in which a pest lives, traps and removes pests where they are not wanted, or excludes pests. Examples of this type of control include harborage elimination through caulking or filling voids, screening, and so on.
b) *Cultural control.* Strategies in this method involve manipulating environmental conditions to suppress or eliminate pests. For example, spreading manure from stables onto fields to dry prevents fly breeding. Elimination of food and water for pests through good sanitary practices may prevent pest populations from becoming established or from increasing beyond a certain size.
c) *Biological control*. In this control strategy, predators, parasites, or disease organisms are used to control pest populations. Sterile flies may be released to lower reproductivity. Viruses and bacteria which control growth or otherwise kill insects may be used. Parasitic wasps may be introduced to kill eggs, larvae, or other life stages. Biological control may be effective in and of itself but is often used in conjunction with other types of control.
d) *Chemical control.* Pesticides kill living organisms, whether they will be plants or animals. At one time, chemicals were considered to be the most effective control available, but pest resistance rendered many pesticides ineffective. The trend is to use pesticides which have limited residual action. While this has reduced human exposure and lessened environmental impact, the cost of chemical control has risen due to requirements for more frequent application. Since personal protection and special handling and storage requirements are necessary with the use of chemicals, the overall cost of using

chemicals as a sole means of control can be quite costly when compared with nonchemical control methods.

5.2 Integrated pest management outlines. This subchapter addresses each major pest or category of similar pests, by site, in separate outlines.

5.3 Annual workload for surveillance, prevention, and control. In this subchapter should indicate the number of man-hours expended for surveillance, prevention, and control of pests.

Annex 3-B: Use of Preservatives/additives and Hazardous Chemicals

NGOs shall have procedures on the safe use of preservatives and chemicals, if used. All preservatives/additives and hazardous chemicals shall only be used in compliance with the joint WHO and Food and Agricultural organization of the United Nations (FAO) expert committee on food additives permissible lists and doses[4] . In addition to complying with the manufacturers' recommendations for storage, use, application and disposal. Information shall be provided by the NGOs to workers which describes the essential components of the materials to be used so that an informed determination can be made as to the potential for environmental effects and suitability can be made. NGO shall have procedures for storage, use, and disposal of excess preservatives and chemicals which shall be managed in conformance with the manufacturers' recommendations and in accordance with local authorities' requirements. If appropriate a Plan should be prepared by the NGOs with a list of materials and estimated quantities to be used and storage, spill control, and waste disposal plans to be observed during the execution of the works.

[4] http://www.fao.org/3/w8495e/w8495e1c.htm

Annex 4: Community Health and Safety Plan

1. Introduction

1.1 General

The purpose of Community Health and Safety Management Plan (CHSMP) is to define and set the ESMF requirement of the Health and Safety Management System. Those requirements are in line with the World Bank ESSs, the ESMF, the EHSGs, and other relevant Good International Industry Practice (GIIP) including the government and WHO guidelines on COVID-19. Those requirements will enable the Ministry of Finance, partner ministries and stakeholders to achieve and deliver projects in safe manner. The MoF will implement the West Bank Emergency Social Protection Project COVID-19, the Project following this Community Health and Safety Management Plan.

The project is aligned with the strategic objectives of the World Bank Group (WBG), and with the WBG's response to the COVID-19 pandemic. The proposed project will provide support to poor and near poor households in response to the COVID-19 pandemic. These households are most vulnerable to COVID-19-triggered shocks to labor income, remittances, and food prices. The project development objective is to provide cash support and short-term employment opportunities to vulnerable populations in the West Bank affected by COVID-19.

The proposed project will support the PA's emergency response to the COVID-19 crisis through four components:

1) Emergency Cash Transfers in the West Bank;
2) Cash for Work in the West Bank (C4W);
3) Capacity Building, Project Management, Monitoring and Evaluation; and
4) Contingent Emergency Response Component (CERC).

These components are fully described in the Project Appraisal Document (PAD) set up by the World Bank Group (WBG) for a proposed grant to Palestinian Authority.

This proposed CHSMP applies for all components of the project but in particular for component 2, Cash for work component (C4W), as this component will address the risk of hazard due to jobs or tasks with close frequent contact with visitors, co-workers and others and due to its content of multiple activities in different workplaces.

1.2 OHS and Palestinian Law

Local Palestinian laws, resolutions, and ministerial instructions and decisions have addressed different aspects and issues of occupational safety and health, and suitability of the working conditions. Two main laws are presence and intensely point out to OHS deed, The Palestinian Labor Law No. 7 of 2000 and The Palestinian Safety Law No. 3 of 2019.

Law No. 7 of 2000 guarantee workers' rights to occupational safety and health at workplace, and regulate inspection of work conditions by the competent authorities, and other areas. While Law No. 3 of 2019 was considered to regulate the issue of appointing supervisors OHS in accordance with the requirements and mechanisms of monitoring the implementation of the Palestinian law and within data related to the size of the facility and the number of its employees. It also includes the formation of a technical safety committee within workplaces and locations, its work powers and how to form it.

Beside these Laws, several resolutions and ministerial instructions were issued detailing health conditions and standards related to occupational safety at different workplaces. These include:

- The ministerial decrees No. 15, 17, and 21 of 2003 concerning health conditions and standards at workplaces, medical assistance procedures at the workplace, and safety standards at companies.
- The Decision of the Council of Ministers No. (49) of 2004 concerning the preventive list of work hazards and career diseases and work accidents.

- Instructions by the Minister of Labor no. (1) of 2005 concerning the precautions to protect workers in construction sites.
- Instructions by the Minister of Labor no. 2-6 of 2005, defining the range of chemical exposure limits and standards, exposure to ionizing radiation, noise, and safe levels of brightness of light and temperature at the workplaces

1.3 Health and Safety and Labor Conditions Guidelines

In addition to the adhering to the Palestinian Labor Law No. 7. as a reference for the workers and workplace conditions, and the contractual requirements, the World Bank (ESHS) Guidelines will also be followed as a main reference for all of the OHS measures. Meanwhile the WHO and Palestinian MoH guidelines will be adhered with to minimize risk of exposure COVID-19.

Moreover, the following international guidelines regarding to Environment, Health, and Safety and Labor conditions will be persued and NGOs will be encouraged to refer to these international guidelines beside the Palestinian Labor Law No. 7:

ILO Core Labour Conventions

- http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---normes/documents/normativeinstrument/wcms_c087_de.htmFreedom of Association and Protection of the Right to Organise Convention, 1948 (CO87)
- Right to Organize and Collective Bargaining Convention, 1949 (CO98)
- Forced Labor Convention, 1930 (CO29)
- Abolition of Forced Labor Convention, 1957 (CO105)
- Equal Remuneration Convention, 1951 (CO100)
- Discrimination (Employment and Occupation) Convention, 1958 (CO111)
- Minimum Age Convention, 1973 (CO138)
- Worst Forms of Child Labor Convention, 1999 (CO182)

1.4 Scope of application

The main community health and safety risks identified for the project are related to exposure, infection, transmission of COVID19 virus and potential exposure to communicable diseases by contracted workers including social workers associated with the project activities; sexual exploitation and abuse, and sexual harassment and exposure to hazardous waste management.
The scope of the Community Health and Safety Management Plan (CHSMP) addresses MoF's commitment to:

- Mitigate potential impacts of Project related activities that may affect the health, safety and Management of communities within the Project area as defined in the ESMF;
- Maintain healthy work force who are engaged with the community; and
- Contribute to the improved health and wellbeing of the local community in the Project area.

The CHSMP will be implemented for the project, in particular for project component (C4W), and continue to the end of the Project life.
This Plan provides a framework which is conceptual in nature and will be updated as and when necessary, when more information becomes available.

2. Institutional arrangement for the plan

2.1 Establishing a Health and Safety Committee (HSC)

MoF will establish a HSE Committee consisting of designated all involved teams in the project representatives together with a PCU-MoF Representative appointed, in this case the HSS. The H&S Committee will determine the procedures of the meetings, chairmanship of this committee will be the assigned HSS by PCU-MoF.

The HSE Committee will meet minimum monthly and consider safety issues on the agenda. The first assignment for this committee is to adopt the Emergency Response Plan as a requirement of the POM for the environmental and social standards

HS Committee's Agenda (But not limited to)

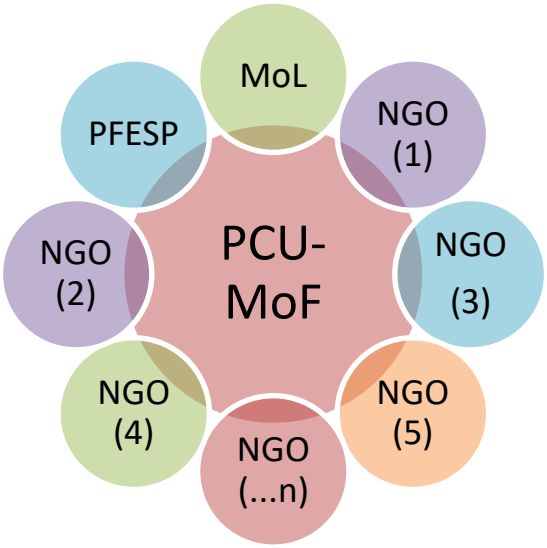
1) Opening and determining any new issue to add to agenda (only when necessary)
2) Minutes of Previous Minutes
3) Observations
4) Program and Safety considerations
5) Hygiene
6) Progress & improvement
7) Incidents & Accidents / Injuries
8) Registers:
    a. H&S Rep. Inspections
    b. Incident! Report Investigation
    c. Personal Protective Equipment
    d. Contact Tracing of COVID-19
    e. Matters of First Aid (If Necessary)
9) Safety performance Evaluations
10) Education & Safety promotion program
11) Posters and signage
15) Specific training programs
16) General
17) Date of Next Meeting
18) Closing

H&S Committee's Membership

Membership will include:

a. PCU-MoF chairman, will be represented by assigned HSS, and any other.
b. MoL Representative with maximum 2 representatives
c. PFESP Representative with maximum 2 representatives
d. One representative of each selected NGOs participating in project

All representatives from MoL, PFESP and NGOs will be trained accordingly with the CHSMP and will be oriented to the use of required safety forms in order to fully carry out the required tasks.



3. Community Health and Safety Risk and Mitigation Measures

3.1 Community Health and Safety Risks

Under the project, social workers and other benefiting workers will directly engage with the public for health, education, community organizations and other services (including related to agriculture) provided by selected NGOs, and hence, would be interacting with communities. These interactions would increase the risk of exposure to the COVID-19 for these workers and pose a similar risk for the communities, especially the vulnerable groups.

The interaction during home visits, especially in homes without any male presence will also increase the risk of exposure of youth, including vulnerable youth and women to GBV, SEA/SH. The project will ensure the avoidance of any form of GBV, SEA/SH of patients and community members at large by relying on (i) the WHO Code of Ethics and Professional conduct for all workers and (ii) World Bank guidelines on the mitigation of SEA such as the project benefiting workers will sign enforceable workers' codes of conduct (CoC), a sample CoC is presented in the Labor Management Procedures (LMP) prepared for the project, sensitization of workers and affected communities, and establishment of referral pathways. The project level GRM will include specific procedures for GBV including confidential reporting and ethical documentation of GBV cases. To prevent GBV risks, the project will embed culturally sensitives messaging in the delivery of the cash transfers and C4W to promote healthy conflict resolution and stress management at household level. It will also explore the use of behavioral insights, for example by labeling the transfers and top-ups in a way that values the redistribution of care work among household members.

In addition, the Project presents community health and safety risks due to exposure to communicable diseases, including COVID-19, and potentially inadequate management of hazardous medical waste and pesticides under component 2. The project will follow WHO guidelines on long term care facilities and on OHS for social workers operating with vulnerable groups and will also implement relevant emergency preparedness and response measures.

3.2 Health and Safety Rules and Regulations Briefing

The CHSMP, and in line with local rules and regulations, requires to provides Health and Safety briefing to all stakeholders and workforce being engaged to this project. Health and safety briefing will be included in the training program designed for this project to explain the site Health and Safety Rules and regulations, and

allow workers to get introduced to the work sites, and the associated risks in the Project. Once briefed, the worker should sign to the briefing register (Appendix 2), Code of Conduct and sign on commitment letter that he/she are aware, and will be responsible to comply with the Project Health and Safety Rules and Regulations. Communities will also be briefed, as part of the Stakeholder Engagement Plan and information disclosure tools listed therein, regarding the management of health and safety issues under the project.
The CHSMP requires that all participating parties in this project to cover as a minimum the following Community Health and Safety Rules at working locations, and document it in the project safety file:

1. It is prohibited to start work before receiving safety instructions and training
2. Follow and comply with Local Regulations regarding Covid 19.
3. All kind of abuse, harassment and any use of violence against others is forbidden.

OHS Framework

MoF-PCU believes that a good safety management plan should answer all project's inquiries and needs by setting up a framework that adapts requirements and procedures. The ,POM has set OHS Measures to be carried out by the CHSMP, this can be considered as the working activity platform of the SHC, and therefore, the following table describes OHS's framework that covers all aspects to follow up:

	Content	Requirements	Procedures
OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES	Hazards to project workers	• Policy & program • Training Portfolio	• CHSMP Manual • Training & Tool box meetings
	Preventive & protective measures	• Policy & program • Training Portfolio	• Health & Safety Committee • Risk Assessment • Inspections
	Training of project workers & maintenance of training records	• Training Manual (Arabic) • Program Forms	1) Workshops clarifying CHSMP 2) 3 levels of training • MoL, MoF, MoSD, PFESP • Participating NGOs • Contract Workers
	Documentation & reporting of occupational accidents, diseases, and incidents	Safety Forms Coordination	• Monthly Report • Documented Forms • Documented HSC meetings
	Emergency prevention & preparedness & response arrangements to emergency situations	Emergency response Plan will be defined by HSC	• Safety Committee • Forms : Contact Tracing Form
	remedies for adverse impacts such as occupational injuries, deaths, disability, & disease.	• Data & Feedback • Reports	• Accident / Incident Reporting • Root cause and corrective action

4. Risk Assessment Methodology

Risk assessment is considered one of the most vital procedure in safety as it strongly helps in putting up procedures of control in its scientific approach. Risk assessment will be defined in the following five main

steps:

- Identifying the Hazards
- Decide who might be harmed and how
- Evaluate the risk and decide on control procedures to mitigate hazard
- Record and report findings
- Review and update if required.

5. Measures to minimize the potential for community exposure to communicable diseases

The purpose of this section is to comply with all COVID-19 consideration in the project, and will fulfill the required commitment to WHO regulations and standards. The CHSMP fully considered the commitment of PA to the emergency resolution and policies that include universal guidelines in accordance and full understanding with to the ESMF of this project.

5.1 WHO and Ministry of Health requirements for dealing with Covid-19 risks

The following applies to the cash for work activities complying with Ministry of Health guidelines:

- NGOs shall ensure all of their teams are covered with medical insurance and have access to health care system.
- NGOs shall ensure providing personal protection equipment and sanitization to their teams and visitors.
- NGOs workers shall maintain their personnel hygiene, washing their hands and face with water and soap, and washing dirty clothes on daily basis and keeping the right distance in office spaces and at work sites.
- All ESMP's shall include measures depicted in Annex 1 of the ESMF that provide guidance on proper health and safety measures for workers.

5.2 Procedure's considerations

The NGO will take measures to provide awareness for social workers to strictly adhere to the guidelines issued on COVID-19 by the Government and the WHO protocols such as practicing proper hygiene, masking and other safety precautions including social distancing measures and using personal protective equipment (PPE) such as facemasks etc. (see Annex 1 of the ESMF for guidelines on public works under COVID-19 context) and ensuring that adequate medical waste handling and disposal procedures are in place in the health clinics and agricultural NGOs.

Contact tracing is a key strategy for interrupting chains of transmission of COVID-19 and reducing mortality associated with the virus. Individuals who have been in contact with this case are identified and instructed to quarantine to avoid further transmission of the virus in the targeted communities. This procedure assists in COVID-19 risk assessment and helps in decision making regarding an infected case/cases to keep the project ongoing with less risk and no obstructions.

A contact tracing form will be in use for this purpose, this form will be used by selected NGOs in their follow ups with their beneficiaries elected for the project. The form will include significant information related to the case.

The form includes basic information about infected person, address, location of work and other relevant information.

Contact tracing form will include the following inquiries in order to achieve best procedures of chain of transmission interruption:

1. Basic information; name, address, location of workplace … etc.
2. Number of co-workers in workplace
3. Type of workplace; Open space, closed, semi closed …etc.
4. Numbers/Names of which the case was in close contact in the community, if applicable
5. Action taken

6. Recommendations.

6. Agricultural Hazard

Misuse of pesticides, toxic agrochemicals, and preservatives in the agricultural sector is a potential impact on community health and safety. MoF will conduct a risk assessment of site safety hazards where hazardous chemicals and pesticides will be used and design and implement measures specific to mitigate the hazards including manage agriculture-related effluents risks and preparation of PMP and guidelines for use of preservatives and hazardous chemicals, where applicable. Templates are present in annex 3-A and annex 3-B in the ESMF.

MoF should ensure presence of Emergency Response Plan (ERP)/measures in place. If not exist, the agriculture NGOs and health facilities will be responsible for preparing the ERP/measures that is commensurate with the risk levels in coordination with the relevant local authorities to track and respond to accidents, incidents, near misses and fatalities. The key elements of an ERP are defined in ESS 4 Community Health and Safety (ESMF section 5.2).

7. GBV, SEA/SH

Acceptable measures to mitigate Violence, harassment and discrimination should follow 5 functional set of performance: Plan, inform, prevent, support and work across sectors, measures within these functional set can be identified in the following:

- Include violence prevention and response in pandemic preparedness and response plans and in risk mitigation communications as part of HSC duties.
- Ensure prevention and response programs and services for those affected by violence are maintained during work through regular inspection routine work.
- Ensure workplace inspection to conduct preventive inspection visits aimed at identifying all types of violence against workers, including harassment, sexual harassment, violence and ill-treatment.
- Provide Training about the signs, symptoms and risk factors of violence workplaces and how to act when violence observed.
- Workers will be provided with the resources, information and training they need to execute their responsibilities effectively and safely.
- Enforce rules and regulations to reduce risks associated with violence, for example, harms caused by alcohol, weapons, drug use and/or addictive behaviors.
- Provide information that should include tips about how to manage stress, to reduce the likelihood of perpetration of violence and encourage self-care and techniques to reduce stress and mental distress.
- identify hazards and assess the risks of violence and harassment, with the participation of workers and their representatives, and take measures to prevent and control them. Participation is kept under full secrecy to ensure privacy.
- Keep existing helplines functioning and ensure supporting services are accessible to all. Helpline is available within the complaints system.
- Arrange follow-up for those who have experienced violence and remain in regular contact with them.
- Collaborate with participating NGOs, through OHS representatives in HSC, to address violence by setting up a coordinated consistent support.
- Collaborate with NGOs and other sectors to align messages about violence, stress and harassment existing prevention programs and services.

Code of Conduct and SEA/SH Measures

The safety measures, workers GM and SEA/SH prevention and complaints measures will be detailed in the Code of Conduct, knowing that the Code of conduct will be oriented for all workers. The Code of Conduct will be prepared for worker to indicate that they have:

- received a copy of the code;
- had the code explained/oriented to them;
- acknowledged that adherence to this Code of Conduct is a condition of employment; and
- understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

Measures for meaningful consultation and engagement with communities, as outlined in the project Stakeholder Engagement Plan, as well as mitigation of adverse impacts on the community health and safety risks will be ensured. These risks include those associated with the COVID-19 pandemic and type of work as well as potential risks associated with Gender Based Violence/Sexual Exploitation and Abuse/Sexual Harassment (GBV/SEA/SH) during situations of emergency and extreme financial strains on individual households combined with cash transfer and C4W.

All project workers and communities in contact with project workers will be made aware of the GRM for the project as well as the GRM available for the workers. The GRM system will include special referral pathways for the GBV complaints and grievances including grievances on Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). Information about the existence of the GBV grievance mechanism will be communicated to all stakeholders through different methods (i.e., public consultations, posters and leaflets, local radios and social media).

8. Training

MoF will train workers, communities, and vulnerable groups in contact with project's workers on specific communicable diseases and occupational health and safety guidelines to follow during COVID-19 pandemic in line with the Government, WB and WHO guidelines and protocols. Special training needs to be provided for workers in health clinics and agricultural NGOs.

Training will also be provided by a GBV expert for the ESO on detection of cases of GBV and handling of inquiries, complaints and grievances related to GBV. Staff assigned for handling complaints at the MoSD and MoL will also be trained on detecting, receiving, and handling GBV.

9. Incident and Accident Reporting

Inspection and reporting is the best way in which a responsible NGO can control area of responsibility, along with other supervising teams in participating Ministries in the project as well as the PCU- MoF. All incidents, therefore, irrespective of whether it gave rise to loss, injury, damage or not, shall be investigated and the results will be recorded and reported directly within their assigned reporting timeframe.

Three types of reporting are requested when an incident/accident occurs, reporting to be used accordingly in response to requirements of OHS procedures described in the ESCP, these reports are as follows:

- Initial Incident / Accident Notification related to the Project that has, or could have a significant adverse effect on the environment, the affected communities, the public, or the workers included, for example, occupational accidents that could result in death or serious injury, cases of GBV or violence against minors, injuries, falls, vehicle accidents, etc., reporting notify to the WBG should be within 24 hours.

- Incident / Accident Detailed Report that provides sufficient details regarding the incident or accident, and indicate immediate measures taken to address it; reporting to the WBG not later than 48 hours after the initial notification.
- Root Cause Analysis Report detailing summary findings to identify the causes of the incident and submit it to the WBG. RCA will be submitted no later than 10 days after the initial notification.

Appendix 3 provides the forms for each type of reporting.

	Type of Reporting	Reporting Time	Type	Responsibility
1	Initial Incident/Accident Report	24 Hrs.	Notification	Participating NGOs
2	Incident/Accident Detailed Report	48 Hrs.	Immediate measures	Participating NGOs & PFSEP
3	Root Cause and Corrective Action	10 Days	Detailed summery findings of the RCA	PFSEP in coordination with PCU-HSS

Responsibilities

- MoF-PCU will ensure prompt and accurate reporting and investigation of community-related "incidents," which include all work-related injuries, illnesses and near misses, or accidents that could have caused serious injuries.
- All work-related incidents in the community occurring during the performance of the employee's job duties will be reported promptly to PCU-MoF officially through Initial Accident Report Form (See Appendix 3) within their reporting time by participating NGOs.
- The results of the investigation to be entered into the Accident/Incident Register list. An incident register will be maintained and documented at HSC coordinator (HSS), throughout the duration of the works.

10. Key Performance Indicators (KPIs)

Assessing performance is eligible to quality assurance of all aspects within Community Health and Safety Management Plan. It helps supervision to track attitude towards safety application in all aspects of the project. Therefore, the criteria for ensuring the implementation and management of the plan are dependent on some elements that contribute to determining key indicators of performance.

Key indicators are specified as follows:

a. Contact tracing of COVID-19 among all participating contracted workers can be measured through applying inspection tracking of any suspected infected corona case.
b. Training, toolbox talks meetings for all sectors.
c. Training to targeted personals and communities.
d. Number of workers who have completed required safety and health training.
e. Number of HSC held meetings and percentage of attendance.
f. Results of worker and community exposure monitoring that show that exposures are hazardous.
g. Number of reportable accidents / incidents.
h. Number of community complaints registered, processed, and resolved.

APPENDIX 1: Declaration of Commitment of Implementing Health and Safety Measures

I/We (…Employer's/NGO's Name…) declare that I/we have taken into consideration all the above-mentioned safety matters mentioned in Community Health and Safety Management Plan (CHSMP) and fully meet the eligibility criteria defined within the context.

I/We (…Employer's/NGO's Name …) declare that I/we and on the behalf of all our working team supported by our entire internal line management is accountable for the implementation of CHSMP and shall remain committed to:

- Comply with all requirements to safety and regulations to mitigate and disinfect COVID-19 impact
- Protect the health & safety of our employees, visitors, and beneficiaries of the Project.
- Increase our employee awareness of OHS concerns and issues.
- Comply with relevant OHS legislation, Group and other applicable requirements.
- Provide the tools, internal OHS resources and attend training necessary for the implementation of effective OHS management systems.
- Fully respond to all OHS Instruction by PCU-MoF Team and/or their OHS representatives and consultants.
- Fully respond to any request from PCU-MoF and/or the donor of the project and/or their representative/s to audit our project safety files and documentation at any time.

I/We acknowledge the importance of creating a positive safety culture through employee involvement and effective policies and procedures and I/We hereby confirm the receipt and understanding of the above letter.

NAME OF Participating NGO	ADDRESS	SIGNATURE AND STAMP	DATE

APPENDIX2: Training and Commitment Form

OHS TRAINING SIGN-IN SHEET

TRAINING		TRAINER	
Title:		Name:	
Number:		Title:	
Duration:		Comments:	
Location:			

#	ATENDEES NAMES	JOB/TITLE	SIGNATURE
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

WEST BANK EMERGENCY SOCIAL PROTECTION COVID-19 RESPONSE PROJECT (ESPRP)

FORM 02: EMPLOYEE ACKNOWLEDGMENT

I hereby acknowledge that I attended the OHS induction course, delivered in a language I comprehend, understood its contents.

I confirm that if I encounter unsafe conditions or acts in the course of my work, I will discuss them with my Supervisor and/or HSS-PCU of MoF.

I am fully aware that this signed acknowledgement will be placed in my personnel file.

Employee Name: …….

Ministry / Corporation: ……

Signature: …….

Date: …….

APPENDIX3: Incident / Accident Initial Report

Reporting (24 Hrs.) Form

Project	WEST BANK EMERGENCY SOCIAL PROTECTION COVID-19 RESPONSE PROJECT (ESPRP)
NGO's Name	
Governorate	
Location	
Ref No.	

Date of Incident	...../...../ 2021
Time of Incident	..... :.....AM/PM
Name of OHS Representative	

Name of Injured: Job:

Sex: Type of Incident: Major Minor Near Miss

Brief Description of Incident

Location of Incident Supervisors' Name

Planned Action to Take:

Detailed Incident Summery Report (48 Hrs.) Form

Signature	
Date of Reporting	
Time of Reporting	

Distribution: PCU-MoF

PFESP

Project	WEST BANK EMERGENCY SOCIAL PROTECTION COVID-19 RESPONSE PROJECT (ESPRP)

NGO's Name	
Location	
Ref No.	

Incident

Date of Incident	...../...../ 20.....
Time of Incident	..... :..... AM/PM

Investigation

Name of Investigator:	
Starting Date of Investigation:	

Name of Injured: Job:

ID #: Age: Sex:

Nature of Injury & Body Part Affected:

Treatment Rendered:

Report Only: Onsite 1st Aid: Offsite 1st Aid:

Location of Incident Supervisors' Name

Description of Incident:

Corrective Action:

Final Report Form

Distribution: PCU-MoF

PFESF

Name of OHS Representative	
Signature	
Date Report Completed	

1) General Information

Project	WEST BANK EMERGENCY SOCIAL PROTECTION COVID-19 RESPONSE PROJECT (ESPRP)
Employer	
Location	
Ref.	

Date of Incident	……/……/ 20……
Time of Incident	……. :……. AM/PM

Name of Investigator:……
Starting Date of Investigation: ……
Date of submittal : ……

2) Particulars

Did the incident involve injury/s | Yes | No

If Yes, Name of injured person/s

1.	Name:	Job:	Mobile:
2.	Name	Job:	Mobile:
3.	Name	Job:	Mobile:

Location of Incident:

Supervisors' Name:

Did the incident involve property damage? | Yes | No

If yes, describe:

Was 1st Aid Rendered? If yes, by whom? | Yes | No

(If outside emergency assistance was required, give description)

3) Description of Incident:

Describe the incident in details

4) Evidence:

Person with information, Statement summary :

Name :	Date interviewed:
Job Title:	Interviewer:
Location when incident occurred:	
Summary of statement:	
Signature of witness	Signature of interviewer:
Name :	Date interviewed:
Job Title:	Interviewer:
Location when incident occurred:	
Summary of statement:	
Signature of witness	Signature of interviewer:

5) Incident Causation

What was the **direct cause** of the incident? (what caused injury or damage?)

What were the **indirect causes**? (what caused the incident?)

6) Corrective Action

Corrective action to prevent recurrence:

Target Date for Corrective Action:

7) Report Review

Name of OHS Representative	
Signature	
Date Report Completed	

Annex 5: Screening Form for Potential Environmental & Social Safeguards Issues

This form is to be used by the Project Coordination Unit (PCU) to screen for the potential environmental and social risks and impacts of a proposed subproject. It will help the PCU in identifying the relevant Environmental and Social Standards (ESS), establishing an appropriate ES risk rating for these subprojects and specifying the type of environmental and social assessment required, including specific instruments/plans. Use of this form will allow the PCU to form an initial view of the potential risks and impacts of a subproject. It is not a substitute for project-specific ES assessments or specific mitigation plans.

A note on Considerations and Tools for ES Screening and Risk Rating is included in this Annex to assist the process.

Subproject Name	
Subproject Location	
Subproject Proponent	
Estimated Investment	
Start/Completion Date	

Part 1: Subproject Eligibility Screening Checklist

No	Will the sub-project:	Yes	No
1	Cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts		
2	Have high probability of causing serious adverse effects to human health and/or the environment not related to treatment of COVID-19 cases		
3	Have adverse social impacts and may give rise to significant social conflict or would require Free Prior Informed Consent		
4	Affect lands or rights of indigenous people or other vulnerable minorities.		
5	Involve permanent resettlement or land acquisition, adverse impacts on cultural heritage		
6	Involve civil works including new construction, expansion, upgrading or rehabilitation of healthcare facilities and/or associated waste management facilities such as a sanitary landfill, incinerator, or wastewater treatment plant for healthcare waste disposal		

Recommendations:

- If one of answer is Yes, the Sub-project is not eligible and rejected: _____
- If All the answers are No, Sub-project is eligible identify potential environmental and social risks and the relevant ES instruments: _____

Part 2: Identification of Relevant ESSs and Due Diligence Action/Instruments

Questions	Answer		ESS relevance	Due diligence / Actions
	yes	no		
Does the subproject involve small-scale civil works during the installation of the new equipment?			ESS1	ESMP, SEP
Is there sound regulatory framework, institutional capacity in place for NGO/healthcare facility infection control and hazardous chemicals/healthcare waste management?			ESS1, ESS3	ESMP, ICWMP, PMP, SEP
Does the subproject have an adequate system in place (capacity, processes and management) to address waste?				
Does the subproject have appropriate OHS procedures in place, and an adequate supply of PPE (where necessary)?				
Does the subproject have a GRM in place, to which all workers have access, designed to respond quickly and effectively?				
All C4W subprojects involve recruitment of workforce?			ESS2	ESMP, LMP, SEP
Is the subproject located within or in the vicinity of any ecologically sensitive areas?			ESS6	Activity excluded
Are there any communities or vulnerable groups present in the subproject area and are likely to be affected by the proposed subproject negatively or positively?			ESS4	ESMP, SEP
Is the subproject located within or in the vicinity of any known cultural heritage sites?			ESS8	Activity excluded
Does the project area present considerable Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) risks?			ESS1	ESMP, SEP

Conclusions:

1. Proposed Environmental and Social Risk Ratings (Substantial, Moderate or Low). Provide Justifications.
2. Proposed E&S Action/Instruments.

Annex 6: ESMP Template

Introduction

Environmental and social management plan (ESMP) is an instrument that details set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures. The MoF will (a) identify the set of responses to potentially adverse impacts; (b) determine requirements for ensuring that those responses are made effectively and in a timely manner; and (c) describe the means for meeting those requirements. The ESMP includes the following components:

Introduction

An overview of the project and the proponent/NGO including information such as: i) project name and general description; ii) background; iii) objectives of the ESMP.

Policy and Legal Framework

Brief outline relevant policies, guidelines and laws that apply to the project and the approvals that need to be obtained from different government agencies.

Project description and Justification

Brief description of the NGO project proposal including project location and footprint (including maps), summary of key design features, resource requirements and source, type and quantify of waste outputs and management, OHS measures in place, work force size, and implementation schedule. Brief justification including benefits accruing to the project relevance areas of support.

Description of the project area

A brief description of the environmental, socio-economic and cultural characteristics relevant to the project and its area of influence.

Consultation and Information Dissemination

A summary of consultation and information dissemination activities during the ESMP process and including general issues raised, and responses to those issues.

Impact Assessment and Mitigation Measures

The ESMP identifies measures and actions in accordance with the mitigation hierarchy that reduce potentially adverse environmental and social impacts to acceptable levels. The plan will include compensatory measures, if applicable. Specifically, the ESMP:
a) identifies and summarizes all anticipated adverse environmental and social impacts;
b) describes, with technical details, each mitigation measure, including the type of impact to which it relates and the conditions under which it is required, together with equipment descriptions, and operating procedures, as appropriate;
c) estimates any potential environmental and social impacts of these measures; and
d) takes into account, and is consistent with, other mitigation plans required for the project.

Environmental Mitigation Plan

Activity	Potential Environmental Impact	Proposed Mitigation Measures	Responsibility for Implementation of Mitigation	Period for Implementation of Mitigation Measures	Mitigation Measures Implementation Costs (and who bears it)

			Measures		
Operational Phase					
1					
2					

Monitoring

The ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters measured, methods used, frequency of measurements, limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

Monitoring Plan

What *parameter are monitored?*	**Where** *is the parameter monitored?*	**How** *is the parameter monitored?*	**When** *is the parameter monitored (time and frequency)?*	**Who** *monitors the parameter (responsibility)?*
1				
2				

Institutional Arrangements, Capacity Development and Training

The ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training). The NGO/Health service is to assign a focal point for implementing, monitoring and reporting to the ESO at the PCU the environmental and social requirements as per the environmental and social instruments.

Annex 7: NEGATIVE LIST FOR CERC

Attributes of Ineligible Subprojects

GENERAL CHARACTERISTICS

Concerning significant conversion or degradation of critical natural habitats. Including, but not limited to, any activity within wildlife and forest reserves, national parks, conservation forests and sanctuaries.

Damages cultural property, including but not limited to, any activities that affect the properties inscribed in the World Heritage List and:

- Other archaeological and historical sites; and
- Religious monuments, structures and cemeteries.

Requires involuntary acquisition of land, or the resettlement or compensation of more than 200 people

Requiring pesticides that fall in WHO classes IA, IB, or II.

Affecting waters of riparian neighbors.

Roads: New primary roads and highways.

Irrigation: New irrigation and drainage schemes.

Dams: Construction of any dams.

Power: New power generating capacity of more than 10 MW.

Oil and Gas: New exploration, production or distribution. Rehabilitation of production or distribution systems.

Income Generating Activities: Activities involving the use of wood for fuel or as raw material from natural habitats. Activities involving the use of hazardous substances.