



**Palestinian Ministry of Planning and International
Cooperation (MoPIC)**

**WEST BANK AND GAZA SOCIAL RECOVERY
AND JOB CREATION PROJECT**

Project ID: P508729

**Environmental and Social
Management Framework
(ESMF)**

May 2025

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Abbreviations and Acronyms

ARA	Access Restricted Areas
CBO	Community Based Organization
CERC	Contingency Emergency Response Component
CFP	Chance Find Procedures
CoC	Code of Conduct
CSO	Civil Society Organization
E&S	Environmental and Social
EA	Environmental Assessment
EHS	Environment, Health, Safety
EHSG	Environment, Health, and Safety Guidelines
EIA	environmental Impact Assessment
EIQ	Environmental Impact Quotient
EQA	Environment Quality Authority
ERP	Emergency Response Procedures
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FAO	Food and Agriculture Organization
FCV	Fragility, Conflict and Violence
GBV	Gender Based Violence
GDP	Gross Domestic Product
GHG	Green House Gases
GM	Grievance Mechanism
GRS	Grievance Redress System
IA	Implementing Agency
IEE	Initial Environmental Evaluation
JSC	Joint Services Council
L&FS	Life and Fire Safety
LALF	Land Acquisition and Livelihood Framework
LGUs	Local Government Units
LMP	Labor Management Procedures
LTC	Local Technical Consultant
M&E	Monitoring and Evaluation
MDLF	Municipal Development Lending Fund
MoA	Ministry of Agriculture
MoF	Ministry of Finance
MoL	Ministry of Labor
MoLG	Ministry of Local Government
MoNE	Ministry of National Economy
MoPIC	Ministry of Planning and International Cooperation
MoTA	Ministry of Tourism and Antiques
NDC	NGO Development Centre

NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PA	Palestinian Authority
PCBS	Palestine Central Bureau of Statistics
PCR	Physical Cultural Resources
PDO	Project Development Objective
PEAP	Palestinian Environmental Assessment Policy
PLL	Palestinian Labor Law
PMP	Pest Management Plan
PMU	Project Management Unit
POM	Project Operations Manual
PPE	Personal Protective Equipment
PSI	Palestinian Standards Institute
PV	Photovoltaic
PWD	Persons with Disabilities
RMSP	Resilient Municipal Services Project
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SRJCP	Social Recovery and Job creation Project
TOR	Terms of Reference
TOR	Terms of Reference
UN	United Nations
UNRWA	United Nations Relief and Works Agency
UXO	Unexploded Ordinance
VAC	Violence Against Children
WHO	World Health Organization

Executive Summary

The World Bank will be supporting the Ministry of Planning and International Cooperation (MoPIC) in implementing the Social Recovery and Job Creation Project in West Bank and Gaza Project. The project is implemented by a number of implementing agencies, Ministry of Planning and international Cooperation (MoPIC) has the main oversight role, contracting MDLF and NDC to implement components 1 and 2 respectively, MoLG, MoA and MoL will also be involved in implementation of technical assistance and goods to enhance the agencies' capacities. The objective of the project is to increase employment opportunities for select groups in target areas; and ii) improve the operational capacity of select government institutions. The project will support the following activities. Component 1: Labor-intensive Infrastructure The component would provide emergency employment assistance to unemployed Palestinians in the West Bank. It will finance labor-intensive small-scale public infrastructure works through short term employment opportunities for unskilled and skilled workers together with construction supervision. Infrastructure priorities to be identified and agreed between local communities and local governments. Component 2: Support to Women and the Disabled This component will support women and persons with disabilities (PWD) who are not able to participate to labor intensive public works activities under Component 1. It will help beneficiaries to grow and sustain existing businesses, and where possible, also create new ones. Whether it be microbusinesses or those which are more well-established, women and Persons With Disabilities are active in broad range of sectors in the West Bank, such as agriculture (fruit and vegetable supply, eggs, olive oil, cheese making etc), handicrafts (embroidery, woodworking etc), and also beauty products and tailoring. Facing challenges such as cultural constraints and a lack of access to training and financial services, many women and Persons With Disabilities struggle to participate in the formal economy. Component 3: MoPIC and PA Capacity Building The component will aim to enhance the institutional capacity of MoPIC, responsible for the strategic oversight of the program, including coordination, conducting impact assessments and evaluating program outcomes. It will also build the capacity of key line ministries involved in project delivery, including, the Ministry of Labor, the Ministry of Agriculture, and the Ministry of Local Government. Component 4: Contingency Emergency Response Component (CERC). This component will provide immediate support to an Eligible Crisis of Emergency, as needed. The CERC allows the PA to reallocate funds from other project components or serve as a conduit to process financing from other funding sources for eligible emergencies. Disbursement under this component will be subject to the declaration of emergency by the PA, the international community, or the United Nations (UN) The project activities will take place in the West Bank only. Activities in Gaza will be possible when the situation allows and with additional financing

This Environmental and Social Management Framework (ESMF) has been prepared to identify the potential environmental and social risks and impacts of proposed Project activities and propose suitable mitigation measures to manage these risks and impacts. It maps out Palestinian laws and regulations and the World Bank policies applicable to the Project, and describes the principles, approaches, implementation arrangements, and environmental and social mitigation measures to be followed.

The potential environmental and social risks for project activities are identified as:

The environmental risk is rated as moderate, and the social risks are assessed as substantial. The key environmental risks under ESS1 include:

- (i) Occupational health and safety (OHS) risks related to the specific activities workers that will be engaged in under components 1, 2, and 3 (small-scale public infrastructure works including

- rehabilitation, maintenance and construction works, handicrafts, homemade/ food processing, Cosmetics, use of pesticides)
- (ii) Air, soil, and water pollution risks associated with construction activities, these include the generation of non-hazardous and hazardous waste, and the release of dust under component 1, hazardous waste such as chemicals, fertilizers and pesticides (component 2), end-of-life e-waste generation associated with supplying equipment (component 3).
- (iii) Pollution and OHS risks related to low risk of potential finding of unexploded ordnances (UXO) in areas affected by military activities in Northern West Bank (Component 1) addressed under ESS2 and ESS3.
- (iv) Limited food safety risks related to small scale food processing (Component 3) assessed under ESS4
- (v) Road and traffic Safety related activities (component 1) assessed under ESS4.

The key social risks include:

- (i) Land acquisition and temporary restrictions to land use
- (ii) Labor management and OHS risks under component 1.
- (iii) Potential exclusion from or inequitable provision of project benefits especially women and PWD
- (iv) Lack of meaningful engagement/dissemination of project information during implementation with women and marginalized groups
- (v) SEA/SH risks under component 2.
- (vi) Additional risks include data privacy breach under component 3
- (vii) Limited capacity of the implementing agencies and their partners in implementing E&S requirement across all components. The measures that will be used in the early stages of subproject planning and design to avoid and minimize these impacts include ensuring that each proposal meets eligibility criteria aligned with program objectives and national, environmental, and social standards. Once a proposal passes this initial check, a predefined exclusion list is applied to filter out projects with unmanageable risks. A screening tool then assesses the remaining proposals for potential risks, reviews mitigation measures, such as proper waste disposal, staff training on environmental and social risk management, and enhanced occupational health and safety practices and capacity to implement effective mitigation measures. Additionally, stakeholders engagement captures local insights capture local insights on environmental and social sensitivities, and detailed monitoring plans are set up to track the effectiveness of these measures throughout the project lifecycle.

These risks will be managed and mitigated through the application of:

This ESMF has been developed as the E&S instrument for assessing, managing and monitoring E&S risks and impacts of the project given that the full nature, scope and geographical locations were not known at the time of preparing the ESMF. ESMF establishes the screening processes and tools to assess the risks and impacts of the sub-projects. This will facilitate the recommendation of appropriate mitigation and monitoring measures for each subproject and/or activity. Also, This ESMF also provides templates of site-specific ESMP/ESMP checklist, in addition to generic mitigation measures and monitoring requirements of the risks and impacts of each potential sub-project. The ESMP will be prepared no later than two months of Project Effective date. Land Acquisition and Livelihood Framework (LALF) for RMSP (P178723) will be updated, redisclose and adopt no later than two months of the Project Effective Date. The SEP were prepared, consulted and disclosed prior Project Appraisal.

Implementation Arrangements.

The project is implemented by a number of implementing agencies, Ministry of Planning and international Cooperation (MoPIC) has the main oversight role, contracting MDLF and NDC to implement components 1 and 2 respectively, MoLG, MoA and MoL will also be involved in implementation of technical assistance and goods to enhance the agencies capacities. MoPIC has limited ESF capacity that requires strengthening to fulfill the project ESF requirements. MoPIC will hire a qualified Environmental Health and Safety (EHS) Specialist and Social Specialist within two months of the effective date. The E&S specialists will have overall ESF oversight of the project level in full coordination with MDLF, NDC, MoL, MoA, and MoLG, and will be responsible for managing the ESF requirements for Components 2 and 3 including MDLF, MoLG, MoA, MoL, NDC with overall oversight at MoPIC including Environmental and Social Framework (ESF). MoPIC will enter into an agreement with MDLF to implement Component 1, MDLF has good experience managing ESF, and has qualified E&S staff, including environmental and social specialists, who have provided valuable support in previous projects and will continue to assist under this project. On the other hand, Local Government Units (LGU)s has weak capacity in ESF implementation, where MDLF is expected to support LGUs with additional E&S consultants hired within two months of the project effective date to support the LGUs in implementing the ESF requirements and build their capacities in ESF. The NGO Development Center (NDC) will enter in agreement with MoPIC to implement Component 2, NDC has established capacity in project management, procurement, financial management, and monitoring and evaluation implementing the Gaza Emergency Support for Social Services. (P177897). NDC has no dedicated environmental and social staff in the West Bank and shall assign an E&S focal point to work closely with MoPIC Environmental Health and Safety and Social Specialists to ensure implementation and compliance with ESF requirements. The NDC is envisaged to engage NGOs, including environmental oriented NGOs to smaller micro women CBOs with limited capacity. Building NGOs and beneficiary awareness on occupational health and safety and environmentally safe practices, GM and Code of Conduct should be provided to the NGO beneficiaries during the project implementation. Component 1 and Component 3 will include activities implemented by MoPIC, MoLG, MoA and MoL, ESF focal points should be assigned at MoLG, MoL and MoA to coordinate ESF requirement for the relevant activities in coordination with MoPIC E&S specialists.

The Project aims to build ESF capacity within the different agencies, where training on ESF fundamentals will be provided as needed-on project level, in addition to an array of OHS training and awareness sessions for the relevant sectors to be conducted during the implementation, workers GM and SEA/SH. Capacity Building for the different implementing agencies will be provided on Identification and assessment of E&S risks, selection and application of relevant E&S risk management measures/instruments, E&S monitoring and reporting, incident and accident reporting, application of Labor Management Procedures, including Code of Conduct, incident reporting, SEA/SH and application of SEP and the grievance/beneficiary feedback mechanism. Tailored capacity building will be provided for NGOs, LGUs on ESF fundamentals, workers health and safety, awareness on UXO risk management and Workers' Grievance Mechanism Prevention of and response to potential SEA/SH incidents

Monitoring.

MoPIC, MDLF, NDC will be responsible for monitoring the LGUs, NGOs, beneficiaries, and contractor compliance with the environmental and social instruments during the project implementation. The beneficiaries, LGUs and contractors implementing subproject activities will be responsible for implementing the mitigation measures in the E&S risk management documents, with MoPIC, MDLF and NDC oversight.

LGUs will submit progress reports to MDLF on a quarter basis, where MDLF will prepare an aggregated report and submit to MoPIC on a biannual basis. Reports from the NGOs will be submitted to the NDC on a quarterly basis, where NDC will submit an aggregated report to MoPIC on a biannual basis. Reports from the MoA, MoL and MOLG will be submitted to MOPIC on a biannual Basis. MOPIC will submit an inclusive progress report to the World Bank on a biannual basis

A separate **Stakeholder Engagement Plan (SEP)** has been prepared for the Project, based the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be accessed through: <https://www.facebook.com/share/p/18bgtFetLj/>

Field Code Changed

1. Introduction

This Environmental and Social Management Framework (ESMF) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank in the West Bank and Gaza Social Recovery and Job Creation Project. The project will support i) increasing employment opportunities for select groups in target areas; and ii) improving the operational capacity of select government institutions in the West Bank. The Ministry of Planning and International Cooperation (MoPIC) will be implementing the Project activities, supported by implementing agencies as described in chapter 2 below.

This ESMF follows the World Bank Environmental and Social Framework (ESF) as well as the national laws and regulations of Palestine. The objective of the ESMF is to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. More specifically, the ESMF aims to (a) assess the potential environmental and social risks and impacts of the proposed Project and propose mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF.

This ESMF should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), and the annexes provided at the end of the document that contain E&S tools such as ESMP and ESMP Checklist templates, simplified labor management procedures, chance find procedures (CFP), and fertilizer and pest management plan.

2. Project Description

The WB&G Social Recovery and Job Creation Project comprises the following components:

- **Component 1: Labor-Intensive Infrastructure:** This component aims to support eligible Local Government Units (LGUs) in the West Bank by financing labor-intensive small-scale public infrastructure works, providing immediate and short-term employment opportunities for unemployed Palestinians. Prioritization will focus on governorates impacted by destruction and high unemployment rates. The selected governorates and beneficiary targeting will be identified by the Ministry of Local Government (MoLG) and the Municipal Development and Lending Fund (MDLF) in consultation with the Ministry of Labor (MoL) and agreed with the local communities and LGUs. Key infrastructure works include (but not limited to); collection and separation of solid waste; cleaning and beautification of roads and public squares; irrigation of green areas; repair and maintenance of roads and retaining walls; rehabilitation and maintenance of LGU public facilities including markets, municipal buildings, cultural centers, libraries, water and sanitation infrastructure, solid waste facilities, cemeteries, parks, gardens, playgrounds, sports facilities, and slaughterhouses; as well as supporting LGUs in work system improvements such as archiving, GIS, project supervision, and public awareness.

- **Component 2: Support to Women and Persons with Disabilities:** This component aims to support women and persons with disabilities (PWD) who are unable to engage in labor-intensive public works under Component 1. It seeks to empower vulnerable and marginalized groups by helping them grow and sustain existing businesses, or establish new ones across sectors such as agriculture (e.g., olive oil, cheese making), handicrafts (e.g., embroidery, woodworking), and beauty products. Activities will include capacity building, training, coaching, and performance-based small grants to improve business management practices, enhance market access, and promote economic inclusion. The NGO Development Center (NDC) will manage this component, coordinating with NGOs and Community-Based Organizations (CBOs) to deliver tailored support to beneficiaries.

- **Component 3: MoPIC and PA Capacity Building:** This component focuses on enhancing the institutional capacities of MoPIC and the PA to lead recovery efforts and develop a phased programmatic approach for economic recovery. The component will support MoPIC for strategic oversight and be the foundation for broader capacity building efforts of MoPIC and the PA. Support under this component will include establishing a Project Management Unit (PMU) within MoPIC, staffed with specialists in different disciplines including social and environmental safeguards, as well as project-level Environmental and Social Framework (ESF) and Occupational health and safety (OHS) capacity building, and support in procurement of goods and services, procurement, outreach and communication, monitoring and evaluation. Additionally, component 3 provides targeted support to line ministries; (i) Ministry of Labor (MoL): Finalizing the automation of the employment database. Support includes IT consultants, training, and infrastructure upgrades. (ii) Ministry of Local Government (MoLG): Enhancing technical and fiduciary capacity to ensure the effective management and implementation of infrastructure and development projects. (iii) Ministry of Agriculture (MoA): Support for domestic product marketing and certification, policy reforms, and training for staff and agribusinesses.

- **Component 4: Contingency Emergency Response Component (CERC):** In the event of a future eligible crisis or emergency, the project will provide an immediate response, as needed. This component would draw from uncommitted funds under the other components of the project. Disbursement under this component will be subject to the declaration of emergency by the PA, the international community, or the United Nations (UN).

MoPIC will coordinate project activities, including day-to-day implementation, coordination, supervision, and overall management of project activities. Overall project implementation will be overseen by the MoPIC. As the lead agency, MoPIC has an important coordination and monitoring role. It will help to resolve any technical or political bottlenecks which may arise across the whole project. For Component 1 the MDLF will have responsibility for the delivery of project activities. Components 2 will utilize an NGO delivery model to be managed by the NGO Development Center (NDC). Component 3 will be implemented by MoPIC. MoPIC will undertake the necessary procurement and financial management and ESF management, to support both their own capacity building needs and also that of the MoL, MoA and the MoLG.

3. Environmental and Social Policies, Regulations, and Laws

This chapter presents the legal and institutional framework governing environmental and social management applicable to the Project. The Project will be implemented in full compliance with applicable Palestinian national legislation as well as the World Bank Environmental and Social Framework (ESF). The chapter summarizes the following: (i) national environmental and social policies, laws, and legislation (Section 3.1), (ii) national environmental and social assessment and permitting requirements (Section 3.2),

and (iii) World Bank Environmental and Social Standards (ESSs) and the identified key gaps and gap-filling measures between national legislation and ESF requirements (Section 3.3). The full and detailed legal, regulatory and institutional framework, including all applicable national laws, regulations, and decrees, as well as institutional roles and responsibilities, is provided in [Annex 10](#) of this ESMF.

3.1. National Environmental and Social Policies, Laws, and Legislation

Table 1: Palestine Relevant Legal Framework

Law	Description and Relevance to Project Activities
The Palestinian Basic Law (2003)	Guarantees basic rights for citizens and recognizes the right to a clean and balanced environment as a basic right for all Palestinians.
Palestinian Environmental Law No 7 of 1999 (1999)	Governs environmental protection, resource management, EIA process, and environmental monitoring and permitting.
The local councils law No.1 issued in 1997	Defines LGUs' responsibilities for planning, waste management, licensing, and public services relevant to subprojects.
Labor Law No. 7 (2000) and the minimum wage act No. 4 of 2021	Regulates labor rights, occupational health and safety, working conditions, child labor prohibition, wages, and union rights.
Law no. 20 of Public Health, 2004	Regulates public health services, occupational health and safety, food safety, environmental health, and disease control.
Law no. 2 of Agriculture, 2003; and Decree-Law No.14 of 2018 amending the 2003 law.	Regulates sustainable land use, forest protection, biosecurity, and use of fertilizers, pesticides, and veterinary practices.
Law No. 1 of 2000 Concerning Charitable Associations and Civil Society Organizations	Governs establishment, registration, funding, and monitoring of CSOs and NGOs.
Palestinian Cabinet Decree on Adopting the General Policy for the Disposal and Treatment of Electronic Waste – June 2021 (02/113):	Defines e-waste as hazardous, regulates collection, storage, transport, and disposal of e-waste.
Land Ownership Law 3, 2011	Regulates land acquisition, compensation, and dispute resolution for public interest projects.
Land Expropriation Law 2/1953	Allows limited expropriation of private land for public interest with compensation for assets affected.
Palestinian Grievance bylaw and the complaints system Decree No.8 of 2016	Provides procedures for receiving and resolving public complaints.
Jordanian Heritage law No. 51 of 1966 and Tangible Heritage Law of 2018	Regulates protection and chance find procedures for cultural heritage and archaeological resources.
The Disability Law no. 4 of 1999	Protects rights of persons with disabilities, ensuring non-discrimination and equal access.
Occupational Health and Safety (OHS) legislations	Establishes OHS standards, protection measures, inspections, and exposure limits across workplaces.
Hazardous waste management bylaw No.6 of 2021	Regulates licensing, storage, treatment, transportation, and disposal of hazardous waste in line with Basel Convention.
Decision No.16 of 2023 regarding construction and demolition waste	Sets requirements for waste management, reuse, recycling, permits, and designated disposal sites.
3.1.7. Cabinet Decision No. 16 of 2013 regarding connecting residences and facilities to the public sewer network	Regulates sewer connections, treatment, industrial discharge standards, and wastewater reuse.
The Palestinian National Solid Waste Management Strategy (2010–2014)	Provides strategic framework for waste management, recycling, and sustainable practices.

Council of Ministers Resolution No. 9 of 2012 on the system of agricultural pesticides	Governs import, registration, and control of agricultural pesticides.
Gender Based Violence (GBV) including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)	Establishes survivor-centered system for GBV response, protection, and referral services.
Civil Defense Law No. 3 of 1998	Regulates emergency response, disaster risk management, and civil defense operations.

3.2. National Environmental and Social Assessment and Permitting

The Environment Quality Authority (EQA) is the competent public authority responsible for overseeing environmental assessment and permitting processes in Palestine. Environmental assessments are carried out under the Palestinian Environmental Assessment Policy (PEAP), issued by Decree No. 27-23/4/2000, which governs all development projects and aims to ensure that economic and social development occurs in a sustainable and environmentally sound manner.

The PEAP defines the Environmental Assessment (EA) system, which includes three types of instruments based on the significance of anticipated impacts:

Table 2: Palestinian Environmental Assessment Instruments

Environmental Assessment Instrument	Description and Applicability
Environmental Approval Application	Required for low-risk projects with negligible or minor environmental impacts.
Initial Environmental Evaluation (IEE)	Applied when the environmental impacts are uncertain or moderate; includes analysis to ensure compliance with environmental requirements.
Environmental Impact Assessment (EIA)	Required for projects expected to cause significant or irreversible environmental impacts.

The screening of projects is conducted by EQA to determine which instrument applies. Screening criteria include: use of natural resources, land acquisition or displacement, location near sensitive ecosystems or cultural heritage sites, levels of anticipated pollution or waste generation, public concern, and potential for cumulative impacts.

For projects requiring EIA or IEE, EQA issues terms of reference (TOR) for the study, reviews submitted reports, and either approves the project with or without conditions, conditionally, or rejects it based on unacceptable environmental risks. Environmental audits may also be conducted, particularly for existing facilities.

Stakeholder consultation is mandatory for EIA as part of the permitting process; however, unlike the World Bank's ESS10, Palestinian regulations do not mandate continuous consultation throughout the project life cycle.

Under the PEAP, the Environmental Assessment outcome includes:

- Mitigation measures and compliance requirements,

- Environmental management and monitoring obligations,
- Conditional approval or suspension based on compliance.

For the purposes of the SRJCP, most subprojects are expected to fall under either Environmental Approval or IEE, given their nature and scale (e.g., small-scale infrastructure rehabilitation, labor-intensive public works, community-level services). Subprojects with potentially significant impacts would trigger full EIA, subject to EQA's screening decision, which are excluded from financing under the SRJCP per the exclusion lists for each component provided under chapter 6 below: [Procedures and Implementation Arrangements](#). Detailed description of the National Environmental and Social Assessment and Permitting processes and the PEAP is provided in [Annex 10](#).

3.3. World Bank Standards and Key Gaps with the National Framework

The project will follow the World Bank Environmental and Social Standards (ESSs), as well as the World Bank Group Environmental, Health and Safety Guidelines. Based on these policies, the environmental and social risk of the project is categorized as Substantial. The project has been assigned a moderate environmental risk category due to several identified risks, including occupational health and safety (OHS) risks related to the type of activities workers will be engaged in. There are also pollution risks from construction activities, such as air, soil, and water pollution, along with the generation of both non-hazardous and hazardous waste, including dust and the disposal of fertilizers and pesticides. Additionally, there is a low risk of finding unexploded ordnances (UXO) in areas affected by military activities in the Northern West Bank, which could pose OHS and pollution risks. The project also faces a limited risk of food safety issues, as well as potential pollution and OHS risks related to the operation of procured testing and inspection equipment, and the generation of end-of-life e-waste associated with supplying IT equipment. However, these risks are localized and can be managed effectively with proper mitigation measures. Institutional arrangements for the project include the MDLF and NDC, both of which have prior experience in implementing ESF requirements. The project has been assigned a substantial social risk rating due to identified risks including small-scale land acquisition, temporary land use restrictions, labor management risks (e.g., OHS, working terms and conditions, minimum age, and lack of effective and accessible workers' GM and female workers being subjected to SEA/SH), community health and safety concerns (such as SEA/SH and data privacy), potential social exclusion of vulnerable groups (e.g., women and persons with disabilities) and/or lack of meaningful engagement during implementation with women and marginalized groups (e.g. persons with disabilities, women headed households, youth, the poor, people living in Area C, communities in Access Restricted Areas (ARAs) and relatively rural/remote locations, and the limited capacity of the implementing agencies such as MoPIC and the beneficiary partners such as the LGUs and the NGOs in implementing the Bank's ESF and the wide geographical scope of the activity. These risks will be mitigated through targeted measures, including a Land Acquisition and Livelihood Framework (LALF), enhanced labor management, and a comprehensive Stakeholder Engagement Plan (SEP).

A detailed comparative gap analysis between the Palestinian legal framework and the World Bank Environmental and Social Standards (ESSs) has been carried out and is presented in [Annex 10](#) of this ESMF. The gap analysis covers each applicable ESS, compares national laws and regulations to the Bank's requirements, and identifies specific gaps related to both environmental and social aspects (including environmental assessment procedures, labor rights, grievance mechanisms, community health and safety, biodiversity, land acquisition, stakeholder engagement, SEA/SH, and cultural heritage). Where gaps exist, the analysis defines gap-filling measures to ensure full compliance with the Bank's ESF throughout project implementation.

The World Bank's environmental and social standards applicable to project activities are summarized below, with more detailed description of each standard and its relevance to the project is provided in [Annex 10](#).

Table 3: Relevant World Bank ESS and Key Gaps with the National Framework

E&S Standard	Relevance
1. Assessment and Management of Environmental and Social Risks and Impacts	ESS1 is relevant as project activities pose moderate environmental risks including occupational health and safety (OHS), air, soil and water pollution, hazardous and non-hazardous waste, dust, disposal of fertilizers and pesticides, and a low risk of unexploded ordnances (UXO) in the Northern West Bank. There are also limited risks related to food safety, procured inspection equipment, and e-waste generation from IT supplies. The project has been assigned a substantial social risk rating due to identified risks including small-scale land acquisition, temporary land restrictions, labor risks (OHS, working conditions, child labor, GBV/SEA/SH), community health and safety (GBV, data privacy), social exclusion of vulnerable groups (e.g., women, PwD, poor, youth, remote communities, Area C, ARAs), and limited institutional capacities of MoPIC, LGUs, and NGOs.
2. Labor and Working Conditions	ESS2 is relevant for the project because there are certain labor risks for project workers. Labor-related risks include OHS, exposure to hazardous materials and waste (e.g., potential uncover of UXO, pesticides, child labor and VAC, exclusion of vulnerable and marginalized groups from employment, in addition to female workers being subjected to SEA/SH general labor working conditions, and lack of effective and accessible workers' GM. Large labor camps are not anticipated for the project.
3. Resource Efficiency and Pollution Prevention and Management	ESS3 is relevant due to the pollution risks associated with construction activities, which include the generation of both non-hazardous and hazardous waste, dust release, and a low risk of encountering unexploded ordnances (UXO) in areas affected by military activities in the Northern West Bank. There are also limited pollution risks related to the handling and disposal of used fertilizers and pesticides. Additionally, the operation of procured testing and inspection equipment may result in the generation of hazardous waste, and there is a risk of generating end-of-life e-waste from both testing equipment and IT equipment.
4. Community Health and Safety	ESS4 is relevant for risks such as SEA/SH (especially for women, girls, PwD), exclusion of vulnerable groups from project benefits, data privacy concerns, community health and safety risks due to potential UXO risks, and food safety and hygiene for agriculture and food production beneficiaries.
5. Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	ESS5 is relevant due to potential small-scale private land acquisition for ROW expansion, road/water network works, and temporary land restrictions affecting small businesses during construction. Some public facilities may require private land where public land is unavailable.
6. Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS6 is relevant, due to potential risks of impacting biodiversity and natural habitats from activities involving the infrastructure works or the agricultural practices, are expected to be limited and insignificant.
8. Cultural Heritage	ESS8 is relevant despite low likelihood of impacts, as works occur within planned urban areas. However, risks remain for chance finds during excavation not covered in masterplans.
10. Stakeholder Engagement and Information Disclosure	ESS10 is relevant due to the need for continuous engagement with beneficiaries and stakeholders throughout the project. A SEP has been prepared for disclosure, two-way communication, and grievance redress during implementation.

4. Potential Environmental and Social Risk Impacts and Standard Mitigation Measures

Table 4: Environmental and Social Risks and Mitigation Measures

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
COMPONENT 1. LABOR INTENSIVE INFRASTRUCTURE			
1.1. General Activities Under Component 1			
<p>labor-intensive small-scale public infrastructure works including rehabilitation, maintenance and construction works, including:</p> <ul style="list-style-type: none"> - road clearance and grass maintenance - Road markings and erection of road signs - Maintenance of culverts, drifts, fences and retaining walls - Planting and arranging of road islands - Cleaning and beautification of public spaces - Irrigation of municipal green areas - cleaning existing road infrastructure (Removing 	<ol style="list-style-type: none"> 1. Labor Rights and working conditions. 2. OHS Risks due to cuts, burns, or injuries from sharp tools and machinery, exposure to harmful dust, or chemicals. 3. Improper Management of solid waste, construction and demolition waste. 4. Dust emissions, runoff, and erosion due to road clearance, grass maintenance, and debris removal 5. Noise and Nuisance. 6. Generation of Hazardous waste (e.g., paints, oils, lubricants, etc.) 7. UXO risks 8. Road and traffic Safety risk. 	<ol style="list-style-type: none"> 5. <u>Labor Rights and Working Conditions</u> <ul style="list-style-type: none"> - Adhere to the PLL, minimum wage act No.4 of 2021, and national legislation relevant to labor rights and working conditions. - All workers should be covered by a valid injury insurance. - The code of conduct should be circulated to workers, oriented on, and signed by all of them. - Workers' grievance mechanisms should be available for workers. - LGUs and Municipalities shall not employ workers under the age of 18 in accordance with Minister of Labor Decision No.1 of 2004 2. <u>Occupational Health and Safety</u> <ul style="list-style-type: none"> - Ensure adherence to National OHS legislation as described The simplified LMP in annex 7. - Ensure adherence to OHS requirements in line with ESS2 and the World Bank General EHS guidelines. - Ensure that all workers receive OHS orientation and training. - Ensure all worker's use PPE (reflective safety clothing, overalls/vests, gloves, mask, wearing apparel, Safety Shoes, helmet and others. Workers require seasonal uniforms for winter and summer conditions) as needed and depending on their roles. - Workers must be supplied with hand sanitizers and encouraged to use them before and after wearing PPE. - It is the responsibility of the LGUs to provide the PPE and sanitizers and not the workers. 3. <u>Management of Solid, Construction, and Demolition Waste</u> <ul style="list-style-type: none"> - construction waste will be removed on a timely basis and disposed of properly at approved landfills in liaison with local municipalities and LGUs, and relevant authorities. - Segregation practices shall be implemented, construction waste and different types of waste shall not be mixed and shall be separately stored in dedicated locations until transported for disposal. - In liaison with EQA, MoA, and the relevant authorities, topsoil reuse, if generated from land clearing, shall be reinvested rather than disposed of. 	<p><u>Implementation</u></p> <p>LGUs</p> <p><u>Supervision</u></p> <p>Municipality, LGUs, LTC</p> <p><u>Monitoring</u></p> <p>MDLF</p>

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
previous debris or construction waste)	<p>9. Inappropriate and inaccessible grievance channels.</p> <p>10. Lack of appropriate and effective stakeholder engagement and information disclosure.</p> <p>11. Community health and safety including GBV (SEA / SH) risks</p>	<ul style="list-style-type: none"> - Depending on the results of the activity and site-specific E&S assessment and screening, waste management measures shall be included in the E&S management tools. For activities expected to result in significant production of solid waste, site-specific waste management plans shall be prepared. - ESS3 and the General EHS Guidelines on waste management shall be adhered to. - Waste segregation shall be implemented, and municipal solid waste shall not be mixed with other types of waste. - The open burning of waste or its disposal in random landfills shall be strictly prohibited. - Adhere to decision No.16 of 2023 regarding construction and demolition waste. <p>4. <u>Dust emissions, runoff, and erosion due to road clearance, grass maintenance, and debris removal</u></p> <ul style="list-style-type: none"> - Install barriers to capture settled material. - Ensure that vehicles are not overloaded and that they are covered prior to each trip to avoid spills and excess fumes from the additional load. - Proper activity scheduling; this includes working hours and days, adhering to weather conditions (e.g., avoiding excavations on windy days) and limiting activities to the daytime. - Depending on the soil type and physical characteristics of the site, utilize water spraying, buffers, dust nets, and screens as appropriate. - Adhering to local and international air quality guidelines; Palestinian ambient air quality guidelines; ESS3; and World Bank General EHS Guidelines. - Create temporary drainage channels or ditches to divert runoff away from exposed areas. Ensure channels are stabilized (e.g., with stone or vegetation) to prevent further erosion. - For activities involving slopes (e.g., retaining walls), contour or bench slopes and consider terracing where feasible to reduce the velocity of surface runoff. - Immediately revegetate or replant disturbed areas after completing works, utilizing native plants or grasses adapted to local conditions. <p>5. <u>Noise and Nuisance Management and Mitigation</u></p> <ul style="list-style-type: none"> • Equipment and machinery must be ensured to adhere to international standards in noise. The social environment in terms of proximity to noise receptors needs to be examined to analyze the severity of the impact. Generic mitigation measures related to nuisance, noise, and vibrations include; - Ensure that equipment and machinery adhere to noise standards set by EQA (PS 840-2005) as well as Ministry of Labor Decisions on exposure limits to Noise No.4 of 2005. 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Ensure that heavy machinery or any noise-producing activities are prohibited from 8 PM till 7 AM and all-day during Fridays and any public and local holiday unless approval has been obtained by the local authorities. - Equipment and machinery have to be maintained periodically per the manufacturers' recommendation to avoid wears which usually results in higher noise levels. - Implement the SEP for each activity, informing stakeholders and local communities of expected working schedules and understanding any concerns they have to formulate adequate mitigation measures. <p>6. <u>Management of Hazardous Waste</u></p> <ul style="list-style-type: none"> - Implement the General EHS Guidelines on Hazardous waste management, ESS3, and adhere to the Palestinian Hazardous Waste Management system No.6 of 2021 related to the specific hazardous material and waste being managed. - Hazardous material safety datasheet has to be followed. - Hazardous waste shall be stored in specific separate locations and have to be clearly marked with their content and frequent inspections have to be conducted. - Transport hazardous waste using special vehicles and contractors - Maintain hazardous waste records and have them regularly checked by an environmental specialist to ensure proper management. - Assign existing technical facilities for hazardous waste treatment and disposal before the project begins. - Train all workers expected to handle hazardous waste on emergency procedures and safe handling practices. - Ensure all workers are familiar with hazardous waste warning sign <p>7. <u>UXO Risks Mitigation</u></p> <p>While these risks are expected to be minimal, adequate measures should be implemented, these have been developed by the MDLF under the MDP4 Project;</p> <ul style="list-style-type: none"> - Implement MDLF's UXO Risk Assessment and Management Plan. <p>8. <u>Road and traffic safety</u></p> <ul style="list-style-type: none"> - Drivers will be warned that they should move with caution. Speed restrictions in work areas and road traffic with heavy machinery will also be regulated, and speed limits for dirt and narrow roads shall be set. - Ensure continuous and regular maintenance of machinery and vehicles in accordance with local transport codes and manufacturers' recommendations. 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Based on the site-specific traffic patterns, schedule vehicle movements to avoid peak and rush hours. - All vehicles shall be equipped with safety equipment per the local transport code. - Inform local communities about traffic movement plans and times of expected high traffic, ensure that appropriate consultation and engagement is being conducted with the local communities - Safety signs should be visible on the roads traversed by the project's vehicles. - Train workers on road safety procedures - Ensure placing proper road and safety signs, barriers between the workers and the street to avoid accidents and proper coordination with local authorities and police where needed - Ensure proper traffic and safety plan is prepared for implementation (if requested) <p>9. <u>Strengthen, update, and maintain the project-level GM in MDLF, LGUs, and MoPIC</u></p> <ul style="list-style-type: none"> - Update, maintain, and operate the existing and accessible GM in MDLF and MoPIC in line with the ESCP requirements and as detailed in the SEP. - Strengthen, maintain, and operate the existing accessible grievance mechanisms in beneficiary LGUs to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties. - Integrate measures and clauses to ensure the uptake and processing of anonymous grievances. - Ensure the availability and effectiveness of SEA / SH grievances referral pathways. - Disclose the GM and ensure highlighting it during stakeholder engagement activities. <p>10. <u>Ensure effective stakeholder engagement</u></p> <ul style="list-style-type: none"> - Conduct stakeholder engagement activities through the different tools, methods, and techniques as detailed in the project SEP. <p>11. <u>Community health and safety risks including GBV (SEA / SH) risks</u></p> <ul style="list-style-type: none"> - Mandatory training for all workers on code of conduct and SEA/SH. - Ensure GMs have adequate SEA/SH complaints referral pathways with confidentiality clauses. - Ensure construction or rehabilitation activities integrate universal design features for accessibility to facilities (e.g., pedestrian walkways, crossings, and public spaces). 	
Solid waste collection, sorting, and recycling	1. Improper management of waste including random disposal	<p>1. <u>Waste management:</u></p> <ul style="list-style-type: none"> - Segregate solid waste and reuse or recycle applicable waste materials, such as wood waste, by redirecting them to facilities that repurpose them for residential use. 	Implementation LGUs Supervision

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
	<p>2. OHS Risks due to injuries and Contact with waste</p> <p>3. Labor rights and working conditions</p> <p>4. Road and traffic Safety risk</p> <p>5. UXO Risks</p>	<ul style="list-style-type: none"> - construction waste will be removed on a timely basis and disposed of properly at approved landfills in liaison with local municipalities and LGUs, Joint Services Councils (JSCs), EQA, MoLG and relevant authorities. - In liaison with EQA, MoA, and the relevant authorities, topsoil reuse, if generated from land clearing, shall be reinvested rather than disposed of. - The open burning of waste or its disposal in random landfills shall be strictly prohibited. - Adhere to decision No.16 of 2023 regarding construction and demolition waste. <p>2. <u>Occupational Health and Safety</u></p> <ul style="list-style-type: none"> - Ensure adherence to National OHS legislation as described in the simplified labor management procedures in Annex 7. - Ensure adherence to OHS requirements in line with ESS2 and the World Bank General EHS guidelines. - Ensure that all workers receive OHS orientation and training. - Ensure all worker's use PPE (reflective safety clothing, overalls/vests, gloves, mask HD wearing apparel, Safety Shoes, helmet and others. Workers require seasonal uniforms for winter and summer conditions) as needed and depending on their roles. - Workers must be supplied with hand sanitizers and encouraged to use them before and after wearing PPE. - It is the responsibility of the LGUs to provide the PPE and sanitizers and not the workers. <p>3. <u>Labor rights and working conditions</u></p> <ul style="list-style-type: none"> - Adhere to the PLL, minimum wage act No.4 of 2021, and national legislation relevant to labor rights and working conditions. - All workers should be covered by a valid injury insurance. - The code of conduct should be circulated to workers, oriented on, and signed by all of them. - Workers' grievance mechanisms should be available for workers. - LGUs and Municipalities shall not employ workers under the age of 18 in accordance with Minister of Labor Decision No.1 of 2004 <p>4. <u>Road and traffic safety</u></p> <ul style="list-style-type: none"> - Drivers will be warned that they should move with caution. Speed restrictions in work areas and road traffic with heavy machinery will also be regulated, and speed limits for dirt and narrow roads shall be set. - All vehicles shall be equipped with safety equipment per the local transport code. 	<p>Municipality, LGUs, LTC</p> <p>Monitoring</p> <p>MDLF</p>

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Safety signs should be visible on the roads traversed by the project's vehicles. - Train workers on road safety procedures - Ensure placing proper road and safety signs, barriers between the workers and the street to avoid accidents and proper coordination with local authorities and police where needed <p>5. <u>UXO Risks Mitigation</u> While these risks are expected to be minimal, adequate measures should be implemented, these have been developed by the MDLF under the MDP4 Project;</p> <ul style="list-style-type: none"> - Implement MDLF's UXO Risk Assessment and Management Plan. 	
<p>Operation and Maintenance (O&M) of Public Facilities, including:</p> <ul style="list-style-type: none"> - Markets, LGU buildings, City Hall, Culture centers, Libraries. - Water and Wastewater facilities. - Solid waste facilities such as Transfer stations. - Cemeteries if operated by the municipality or LGU. - Public Parks and gardens, municipal-owned sports facilities - Slaughterhouses - Other LGU and Municipality 	<p>5. Labor Rights and working conditions.</p> <p>5. OHS Risks due to cuts, burns, or injuries from sharp tools and machinery, exposure to harmful dust, or chemicals.</p> <p>5. Improper Management of solid waste, construction and demolition waste.</p> <p>5. Dust emissions, runoff, and erosion due to road clearance, grass maintenance, and debris removal</p>	<p>1. <u>Labor Rights and Working Conditions</u></p> <ul style="list-style-type: none"> - Adhere to the PLL, minimum wage act No.4 of 2021, and national legislation relevant to labor rights and working conditions. - All workers should be covered by a valid injury insurance. - The code of conduct should be circulated to workers, oriented on, and signed by all of them. - Workers' grievance mechanisms should be available for workers. - LGUs and Municipalities shall not employ workers under the age of 18 in accordance with Minister of Labor Decision No.1 of 2004. <p>2. <u>Occupational Health and Safety</u></p> <ul style="list-style-type: none"> - Ensure adherence to National OHS legislation as described in the simplified labor management procedures in Annex 7. - Ensure adherence to OHS requirements in line with ESS2 and the World Bank General EHS guidelines. - Ensure that all workers receive OHS orientation and training. - Ensure all worker's use PPE (reflective safety clothing, overalls/vests, gloves, mask, wearing apparel, Safety Shoes, helmet and others. Workers require seasonal uniforms for winter and summer conditions) as needed and depending on their roles. - Workers must be supplied with hand sanitizers and encouraged to use them before and after wearing PPE. - It is the responsibility of the LGUs to provide the PPE and sanitizers and not the workers. <p>3. <u>Management of Solid, Construction, and Demolition Waste</u></p> <ul style="list-style-type: none"> - Depending on the results of the activity and site-specific E&S assessment and screening, waste management measures shall be included in the E&S management tools. For activities expected 	<p>Implementation LGUs Supervision Municipality, LGUs, LTC Monitoring MDLF</p>

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
operated facilities.	<p>5. Noise and Nuisance.</p> <p>5. Generation of Hazardous waste (e.g., paints, oils, lubricants, etc.)</p> <p>5. UXO risks</p> <p>5. Road and traffic Safety risk.</p> <p>5. Inappropriate and inaccessible grievance channels.</p> <p>5. Lack of appropriate and effective stakeholder engagement and information disclosure.</p> <p>5. Community health and safety including GBV (SEA / SH) risks</p>	<p>to result in significant production of solid waste, site-specific waste management plans shall be prepared.</p> <ul style="list-style-type: none"> - ESS3 and the General EHS Guidelines on waste management shall be adhered to. - Waste segregation shall be implemented, and municipal solid waste shall not be mixed with other types of waste. - The open burning of waste or its disposal in random landfills shall be strictly prohibited. - Adhere to decision No.16 of 2023 regarding construction and demolition waste. <p>4. <u>Dust emissions, runoff, and erosion due to road clearance, grass maintenance, and debris removal</u></p> <ul style="list-style-type: none"> - Install barriers to capture settled material. - Ensure that vehicles are not overloaded and that they are covered prior to each trip to avoid spills and excess fumes from the additional load. - Proper activity scheduling; this includes working hours and days, adhering to weather conditions (e.g., avoiding excavations on windy days) and limiting activities to the daytime. - Depending on the soil type and physical characteristics of the site, utilize water spraying, buffers, dust nets, and screens as appropriate. - Adhering to local and international air quality guidelines; Palestinian ambient air quality guidelines; ESS3; and World Bank General EHS Guidelines. <p>5. <u>Noise and Nuisance Management and Mitigation</u></p> <ul style="list-style-type: none"> • Equipment and machinery must be ensured to adhere to international standards in noise. The social environment in terms of proximity to noise receptors needs to be examined to analyze the severity of the impact. Generic mitigation measures related to nuisance, noise, and vibrations include; <ul style="list-style-type: none"> - Facility design must consider the sources of noise within the sub-projects' operations, production lines premises for instance have to be closed to reduce ambient noise generation. - Ensure that equipment and machinery adhere to noise standards set by EQA (PS 840-2005) as well as Ministry of Labor Decisions on exposure limits to Noise No.4 of 2005. - Ensure that heavy machinery or any noise-producing activities are prohibited from 8 PM till 7 AM and all-day during Fridays and any public and local holiday unless approval has been obtained by the local authorities. - Equipment and machinery have to be maintained periodically per the manufacturers' recommendation to avoid wears which usually results in higher noise levels. 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Implement the SEP for each activity, informing stakeholders and local communities of expected working schedules and understanding any concerns they have to formulate adequate mitigation measures. <p>6. <u>Management of Hazardous Waste</u></p> <ul style="list-style-type: none"> - Implement the General EHS Guidelines on Hazardous waste management, ESS3, and adhere to the Palestinian Hazardous Waste Management system No.6 of 2021 related to the specific hazardous material and waste being managed. - Hazardous material safety datasheet has to be followed. - Hazardous waste shall be stored in specific separate locations and have to be clearly marked with their content and frequent inspections have to be conducted. - Transport hazardous waste using special vehicles and contractors - Maintain hazardous waste records and have them regularly checked by an environmental specialist to ensure proper management. - Assign existing technical facilities for hazardous waste treatment and disposal before the project begins. - Train all workers expected to handle hazardous waste on emergency procedures and safe handling practices. - Ensure all workers are familiar with hazardous waste warning sign - <p>7. <u>UXO Risks Mitigation</u></p> <p>While these risks are expected to be minimal, adequate measures should be implemented, these have been developed by the MDLF under the MDP4 Project;</p> <ul style="list-style-type: none"> - Implement MDLF's UXO Risk Assessment and Management Plan. <p>8. <u>Road and traffic safety</u></p> <ul style="list-style-type: none"> - Drivers will be warned that they should move with caution. Speed restrictions in work areas and road traffic with heavy machinery will also be regulated, and speed limits for dirt and narrow roads shall be set. - Ensure continuous and regular maintenance of machinery and vehicles in accordance with local transport codes and manufacturers' recommendations. - Based on the site-specific traffic patterns, schedule vehicle movements to avoid peak and rush hours. - All vehicles shall be equipped with safety equipment per the local transport code. - Safety signs should be visible on the roads traversed by the project's vehicles. 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Train workers on road safety procedures. - Ensure placing proper road and safety signs, barriers between the workers and the street to avoid accidents and proper coordination with local authorities and police where needed - Ensure proper traffic and safety plan is prepared for implementation (if requested) <p>9. <u>Strengthen, update, and maintain the project-level GM in MDLF, LGUs, and MoPIC</u></p> <ul style="list-style-type: none"> - Update, maintain, and operate the existing and accessible GM in MDLF and MoPIC in line with the ESCP requirements and as detailed in the SEP. - Strengthen, maintain, and operate the existing accessible grievance mechanisms in beneficiary LGUs to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties. - Integrate measures and clauses to ensure the uptake and processing of anonymous grievances. - Ensure the availability and effectiveness of SEA / SH grievances referral pathways. - Disclose the GM and ensure highlighting it during stakeholder engagement activities. <p>10. <u>Ensure effective stakeholder engagement</u></p> <ul style="list-style-type: none"> - Conduct stakeholder engagement activities through the different tools, methods, and techniques as detailed in the project SEP. <p>11. <u>Community health and safety risks including GBV (SEA / SH) risks</u></p> <ul style="list-style-type: none"> - Mandatory training for all workers on code of conduct and SEA/SH. - Ensure GMs have adequate SEA/SH complaints referral pathways with confidentiality clauses. - Ensure adhering to traditions, religious and local norms during works involving cemeteries. 	
Hiring workers for improving the LGUs work systems, such as: archiving and electronic archiving, geographic information systems and data update projects, project supervision, public awareness	<p>5. Labor rights and working conditions</p> <p>5. Workplace OHS</p> <p>5. Inappropriate or inaccessible Workers' grievance channels</p>	<p>1. <u>Labor rights and working conditions</u></p> <ul style="list-style-type: none"> - Adhere to the PLL, minimum wage act No.4 of 2021, and national legislation relevant to labor rights and working conditions. - All workers should be covered by a valid injury insurance. - The code of conduct should be circulated to workers, oriented on, and signed by all of them. - Workers' grievance mechanisms should be available for workers. - LGUs and Municipalities shall not employ workers under the age of 18 in accordance with Minister of Labor Decision No.1 of 2004. <p>2. <u>Workplace Occupational Health and Safety (ergonomics and office based measures)</u></p> <ul style="list-style-type: none"> - Ensure adherence to National OHS legislation as described in the simplified labor management procedures in Annex 7. 	<p>Implementation</p> <p>LGUs</p> <p>Supervision</p> <p>Municipality, LGUs, LTC</p> <p>Monitoring</p> <p>MDLF</p>

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
	<p>5. Inadequate stakeholder engagement</p> <p>5. GBV (SEA/SH) risks</p> <p>5. Data privacy and Protection</p>	<ul style="list-style-type: none"> - Ensure adherence to OHS requirements in line with ESS2 and the World Bank General EHS guidelines. - Ensure that all workers receive OHS orientation and training. - Provide appropriate ergonomic furniture (chairs, desks) and equipment (ergonomic keyboards, adjustable monitors). - Schedule regular breaks during working hours to prevent repetitive strain and mental fatigue. - Deliver orientation/training on proper ergonomic practices and periodic exercises or stretches. - Ensure adequate lighting and ventilation in workplaces. - Maintain sufficient workspace to avoid overcrowding and facilitate comfort and safety. <p>3. <u>Maintain and Operate an Effective and Accessible Workers' GM</u></p> <ul style="list-style-type: none"> - MDLF to maintain and operate a grievance mechanism for Project workers, consistent with ESS2. - MDLF to ensure that beneficiary LGUs establish and operate a grievance mechanism for Project workers, consistent with ESS2. - Integrate measures and clauses to ensure the uptake and processing of anonymous grievances. - Ensure the availability and effectiveness of SEA / SH grievances referral pathways. - Disclose the GM and ensure highlighting it during stakeholder engagement activities. <p>4. <u>Ensure effective stakeholder engagement</u></p> <ul style="list-style-type: none"> - Conduct stakeholder engagement activities through the different tools, methods, and techniques as detailed in the project SEP. <p>5. <u>GBV (SEA / SH) risks</u></p> <ul style="list-style-type: none"> - Mandatory training for all workers on code of conduct and SEA/SH. - Ensure GMs have adequate SEA/SH complaints referral pathways with confidentiality clauses. <p>6. <u>Data Privacy and Protection</u></p> <ul style="list-style-type: none"> - Provide workers with training on data confidentiality, information security, and privacy requirements. - Limit access to sensitive data strictly on a need-to-know basis and ensure secure storage (both physical and digital). - Regularly monitor compliance with data privacy protocols. 	
1.2. Road Rehabilitation and Maintenance Services			
Construction and Civil Works of Roads	1. OHS risks related to low risk of potential finding	<p>1. <u>OHS risks related to low risk of potential finding of unexploded ordnances (UXO)</u></p> <ul style="list-style-type: none"> - Implement MDLF's UXO Risk Assessment and Management Plan. 	<p>- Responsibility LGU/ Contractor</p> <p>- Supervision</p>

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
Rehabilitation and Maintenance	<ul style="list-style-type: none"> of unexploded ordnances (UXO) 2. Dust generated by construction activities. 3. Increased noise pollution and vibration disturbance 4. Traffic and road safety risks 5. Access restriction to household industrial and social facilities entrance 6. Improper management of Solid waste, Construction and Demolition Waste 7. Generation of Hazardous waste (e.g., paints, oils, lubricants, etc.) 8. Risk of small-scale private land taking 9. OHS risks for workers during construction 10. Labor Rights and Working conditions 11. Potential accidental break of water, 	<ul style="list-style-type: none"> 2. <u>Dust generated by construction activities</u> <ul style="list-style-type: none"> - Install barriers to capture settled material. - Ensure that vehicles are not overloaded and that they are covered prior to each trip to avoid spills and excess fumes from the additional load. - Proper activity scheduling; this includes working hours and days, adhering to weather conditions (e.g., avoiding excavations on windy days) and limiting activities to the daytime. - Depending on the soil type and physical characteristics of the site, utilize water spraying, buffers, dust nets, and screens as appropriate. - Adhering to local and international air quality guidelines; Palestinian ambient air quality guidelines; ESS3; and World Bank General EHS Guidelines. 3. <u>Noise and Nuisance Management and Mitigation</u> <ul style="list-style-type: none"> • Equipment and machinery must be ensured to adhere to international standards in noise. The social environment in terms of proximity to noise receptors needs to be examined to analyze the severity of the impact. Generic mitigation measures related to nuisance, noise, and vibrations include; <ul style="list-style-type: none"> - Ensure that equipment and machinery adhere to noise standards set by EQA (PS 840-2005) as well as Ministry of Labor Decisions on exposure limits to Noise No.4 of 2005. - Ensure that heavy machinery or any noise-producing activities are prohibited from 8 PM till 7 AM and all-day during Fridays and any public and local holiday unless approval has been obtained by the local authorities. - Equipment and machinery have to be maintained periodically per the manufacturers' recommendation to avoid wears which usually results in higher noise levels. - Implement the SEP for each activity, informing stakeholders and local communities of expected working schedules and understanding any concerns they have to formulate adequate mitigation measures. 4. <u>Road and traffic safety</u> <ul style="list-style-type: none"> - Drivers will be warned that they should move with caution. Speed restrictions in work areas and road traffic with heavy machinery will also be regulated, and speed limits for dirt and narrow roads shall be set. - Ensure continuous and regular maintenance of machinery and vehicles in accordance with local transport codes and manufacturers' recommendations. - Based on the site-specific traffic patterns, schedule vehicle movements to avoid peak and rush hours. - All vehicles shall be equipped with safety equipment per the local transport code. 	<p>LGU and LTC</p> <p>- Monitoring</p> <p>MDLF</p>

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
	<p>wastewater, telecommunication, electricity or other utilities service</p> <p>12. finding of cultural, heritage, or archeological assets.</p> <p>13. Uncontrolled discharge of waste and other effluents can contaminate the soil, and degrade the ecology</p> <p>14. Improper stakeholder engagement</p> <p>15. Community health and safety and SEA/SH risk</p> <p>16. Lack of Adequate GM</p>	<ul style="list-style-type: none"> - Inform local communities about traffic movement plans and times of expected high traffic, ensure that appropriate consultation and engagement is being conducted with the local communities. - Safety signs should be visible on the roads traversed by the project's vehicles. - Train workers on road safety procedures. - Ensure placing proper road and safety signs, barriers between the workers and the street to avoid accidents and proper coordination with local authorities and police where needed. - Ensure proper traffic and safety plan is prepared for implementation (if requested). <p>5. <u>Access restriction to household industrial and social facilities entrance</u></p> <ul style="list-style-type: none"> - Provide safe access for any facility on the road and facility along the work area road to ensure no socioeconomic impact. The contractor or LGU shall find alternative streets if possible, and divide the construction streets into sections, to avoid shutting off all rehabilitation streets. - The contractor or LGU shall share the construction program with the residents and shops. - Ensure provide at least one safe passage for entrances to each house. <p>6. <u>Management of Solid, Construction, and Demolition Waste</u></p> <ul style="list-style-type: none"> - construction waste will be removed on a timely basis and disposed of properly at approved landfills in liaison with local municipalities and LGUs, and relevant authorities. - Segregation practices shall be implemented, construction waste and different types of waste shall not be mixed and shall be separately stored in dedicated locations until transported for disposal. - Depending on the results of the activity and site-specific E&S assessment and screening, waste management measures shall be included in the E&S management tools. For activities expected to result in significant production of solid waste, site-specific waste management plans shall be prepared. - ESS3 and the General EHS Guidelines on waste management shall be adhered to. - Waste segregation shall be implemented, and municipal solid waste shall not be mixed with other types of waste. - The open burning of waste or its disposal in random landfills shall be strictly prohibited. - Adhere to decision No.16 of 2023 regarding construction and demolition waste. <p>7. <u>Management of Hazardous Waste</u></p> <ul style="list-style-type: none"> - Implement the General EHS Guidelines on Hazardous waste management, ESS3, and adhere to the Palestinian Hazardous Waste Management system No.6 of 2021 related to the specific hazardous material and waste being managed. 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Hazardous material safety datasheet has to be followed. - Hazardous waste shall be stored in specific separate locations and have to be clearly marked with their content and frequent inspections have to be conducted. - Transport hazardous waste using special vehicles and contractors - Maintain hazardous waste records and have them regularly checked by an environmental specialist to ensure proper management. - Assign existing technical facilities for hazardous waste treatment and disposal before the project begins. - Train all workers expected to handle hazardous waste on emergency procedures and safe handling practices. - Ensure all workers are familiar with hazardous waste warning sign <p>8. <u>Risk of small-scale private land taking</u></p> <ul style="list-style-type: none"> - Avoid any use of private land during construction as any impact on land required LALAP, except of presence of legal document between contractor and citizen to use the land for short time. - Contractor shall not use any land around the street for any purpose. <p>9. <u>Occupational Health and Safety Risks</u></p> <ul style="list-style-type: none"> - Ensure adherence to National OHS legislation as described in the simplified labor management procedures in Annex 7. - Ensure adherence to OHS requirements in line with ESS2 and the World Bank General EHS guidelines. - Ensure that all workers receive OHS orientation and training. - Ensure all worker's use PPE (reflective safety clothing, overalls/vests, gloves, mask, wearing apparel, Safety Shoes, helmet and others. Workers require seasonal uniforms for winter and summer conditions) as needed and depending on their roles. - Workers must be supplied with hand sanitizers and encouraged to use them before and after wearing PPE. - It is the responsibility of the LGUs to provide the PPE and sanitizers and not the workers. <p>10. <u>Labor Rights and Working Conditions</u></p> <ul style="list-style-type: none"> - Adhere to the PLL, minimum wage act No.4 of 2021, and national legislation relevant to labor rights and working conditions. - All workers should be covered by a valid injury insurance. - The code of conduct should be circulated to workers, oriented on, and signed by all of them. - Workers' grievance mechanisms should be available for workers. 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - LGUs and Municipalities shall not employ workers under the age of 18 in accordance with Minister of Labor Decision No.1 of 2004. <p>11. <u>Potential accidental break of water, wastewater, telecommunication, electricity or other utilities service</u></p> <ul style="list-style-type: none"> - Survey of existing facilities during the design. - LGUs and municipalities shall consult relevant utilities, agencies or companies to survey line's locations and to speed up repair of any broken line during construct. - LGUs and municipalities should maintain any of properties/water/wastewater pipes which were harmed due to construction works immediately. They shall be required to store spare parts for maintenance in the construction site for quick action. - Ensure that construction teams are trained and clearly aware of locations of utilities and steps to be taken if any utility is inadvertently damaged. - Informing potentially affected residents and businesses immediately when service disruptions occur. <p>12. <u>Finding of cultural, heritage, or archeological assets.</u></p> <ul style="list-style-type: none"> - Stop construction activities. Immediately notify MOTA - Apply chance find procedure as detailed in Annex 8. <p>13. <u>Uncontrolled discharge of waste and other effluents can contaminate the soil, and degrade the ecology</u></p> <ul style="list-style-type: none"> - Survey of existing facilities during the design, and follow the World Bank EHS Guidelines for Contaminated Land - Ensure proper collection, containment, and treatment of any effluent or wastewater generated during construction activities. - Prevent uncontrolled runoff by implementing temporary drainage and runoff control measures such as silt fences, trenches, sediment basins, and other erosion control techniques. - Avoid storage or handling of hazardous materials, waste, or fuel near water bodies or ecologically sensitive areas. - Implement regular inspections for potential spills or leaks, and maintain spill-response equipment readily available on-site. - Conduct prompt cleanup of spills and leaks using approved methods and materials. - Ensure workers are trained on spill management and emergency response protocols. <p>14. <u>Ensure effective stakeholder engagement</u></p>	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Conduct stakeholder engagement activities through the different tools, methods, and techniques as detailed in the project SEP. <p>15. <u>Community health and safety risks including GBV (SEA / SH) risks</u></p> <ul style="list-style-type: none"> - Mandatory training for all workers on code of conduct and SEA/SH. - Ensure GMs have adequate SEA/SH complaints referral pathways with confidentiality clauses. - Ensure construction or rehabilitation activities integrate universal design features for accessibility to facilities (e.g., pedestrian walkways and crossings). <p>16. <u>Strengthen, update, and maintain the project-level GM in MDLF, LGUs, and MoPIC</u></p> <ul style="list-style-type: none"> - Update, maintain, and operate the existing and accessible GM in MDLF and MoPIC in line with the ESCP requirements and as detailed in the SEP. - Strengthen, maintain, and operate the existing accessible grievance mechanisms in beneficiary LGUs to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties. - Integrate measures and clauses to ensure the uptake and processing of anonymous grievances. - Ensure the availability and effectiveness of SEA / SH grievances referral pathways. - Disclose the GM and ensure highlighting it during stakeholder engagement activities. 	
Operations of Roads	<ol style="list-style-type: none"> 1. Road and Traffic Safety 2. Side soil and erosion 3. Maintenance of new assets (roads and associated wastewater and storm drainage networks) 4. Loss of aesthetic due to the increase in the built-up area around the new road 	<ol style="list-style-type: none"> 1. <u>Road and Traffic Safety</u> <ul style="list-style-type: none"> - Regular inspection and maintenance of traffic signs and barriers. - Implement traffic calming measures (speed bumps, pedestrian crossings). 2. <u>Soil Erosion</u> <ul style="list-style-type: none"> - Regular slope inspections and maintenance. - Establish and maintain grass or vegetation cover. - Use and maintain erosion control mats/geotextiles as needed. - Ensure and maintain proper drainage. 3. <u>Maintenance of new assets (roads and associated wastewater and storm drainage networks)</u> <ul style="list-style-type: none"> - Prepare an annual maintenance plan as well as setting an allocation for the necessary financial resources in the annual budget. - Clearly scheduled inspections. - Regular training for staff. - Clearly define responsibilities among municipal departments. 	<ul style="list-style-type: none"> - Responsibility LGU/ Contractor - Supervision LGU and LTC - Monitoring MDLF

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
	5. Drainage and Flooding Issues. 6. Impacts on Vulnerable Road Users.	4. <u>Loss of aesthetic</u> - Proper design of landscaping for the area and around the road which may include some plantation activities. - Avoid unnecessary tree cutting; conduct tree trimming responsibly. - Landscape with native species. - Regular watering and maintenance schedules for vegetation. 5. <u>Drainage and Flooding</u> - Ensure drainage systems are adequately designed and regularly maintained. - Conduct periodic inspections and clear blockages proactively. 6. <u>Impacts on Vulnerable Road Users</u> - Install adequate pedestrian crossings, ramps, and sidewalks.	
Component 2: Support to Women and the Disabled			
Agricultural Subprojects (fruit and vegetable supply, eggs, olive oil, cheese making etc.)	1. Misuse of pesticides, toxic agrochemicals, and preservatives. 2. OHS risks due to exposure to hazardous chemicals such as fertilizers and pesticides, injuries from handling machinery or heavy tools 3. Pollution risks from improper disposal of agricultural waste, fertilizers, and pesticides 4. Improper hygiene practices, or	1. <u>Use of pesticides, toxic agrochemicals, and preservatives</u> - MoPIC 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, PMP template is available in Annex 9 . 2. <u>Occupational Health and Safety</u> - Ensure all workers receive training on OHS and safe handling of tools, chemicals (e.g. pesticides), and other inputs. - Ensure adherence to National OHS legislation as described in the simplified labor management procedures in Annex 7 . - Ensure adherence to OHS requirements in line with ESS2 and the World Bank General EHS guidelines. - Contamination can be reduced using PPE, selecting adequate pesticides to use complying with Joint WHO/FAO list and avoiding Pesticides WHO Class 1.a and 1.b, 2), and preferably using selective pesticides with low environmental impact quotient (EIQ), following the recommended practices for the storage, transport, handling application and disposal of each agrochemical. - Ensure that all workers receive appropriate wear and PPEs. - Ensure safe storage and labeling of tools, raw materials, and any chemical inputs. - Ensure workers are enrolled in occupational injury insurance.	Implementation Beneficiaries / NGOs Supervision NGOs Monitoring MoPIC, NDC

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
	<p>unsafe handling of food products</p> <p>5. Labor Rights and Working Conditions</p> <p>6. Risks of GBV (SEA/SH)</p> <p>7. Risks of exclusion and inadequate stakeholder engagement</p>	<p>3. <u>Pollution Risk</u></p> <ul style="list-style-type: none"> • Ensure the safe storage, handling, and disposal of agricultural chemicals in line with MoA instructions and legislation and the Hazardous Waste Management System No.6 of 2021. • Prohibit the open burning of waste either municipal, hazardous, or agricultural. • Follow safety guidelines for the storage, transport, and distribution of pesticides and chemicals to minimize the potential for misuse, spills, and accidental human exposure including: <ul style="list-style-type: none"> - Store pesticides and chemicals in a designated, secure, and well-ventilated area away from living areas and water sources. - Use appropriate PPE such as gloves, masks, and eye protection during chemical handling. - Separate pesticides and chemical waste from general household or other agricultural waste. - Dispose of empty containers according to LGUs and EQA regulations - Avoid disposing of pesticides and chemicals near water storage or on open ground. • In case of a spill, immediately isolate the area to prevent further contamination, and use absorbent materials (e.g., sawdust, sand) to contain and clean up spills. • Avoid disposing of food/organic waste in open areas to prevent pest attraction. <p>4. <u>Improper hygiene practices, or unsafe handling of food products</u></p> <ul style="list-style-type: none"> - Train workers on safe handling of food products and good hygiene practices. - Adhere to national requirements for food safety and hygiene (MoH, PSI, MoA, MoNE). - Maintain cold chain (where applicable) for perishable products like cheese and eggs. - Use clean and safe water for food processing. - Avoid using expired or unlabeled inputs (e.g., oils, herbs, dyes). - Label final products with preparation/expiry dates and storage instructions. <p>5. <u>Labor Rights and Working Conditions</u></p> <ul style="list-style-type: none"> - Adhere to the PLL, minimum wage act No.4 of 2021, and national legislation relevant to labor rights and working conditions. - All workers should be covered by a valid injury insurance. - The code of conduct should be circulated to workers, oriented on, and signed by all of them. - Workers' grievance mechanisms should be available for workers. - LGUs and Municipalities shall not employ workers under the age of 18 in accordance with Minister of Labor Decision No.1 of 2004 <p>6. <u>Risks of GBV (SEA/SH)</u></p> <ul style="list-style-type: none"> - Conduct mandatory SEA/SH training for NGO staff and beneficiaries. 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Ensure the project Code of Conduct (CoC) includes strong provisions prohibiting any form of sexual harassment, exploitation, or abuse, and that it is explained and signed by all project staff and participants. - Ensure that the GM includes accessible, anonymous, and survivor-centered uptake channels including SEA/SH referral pathways. <p>7. <u>Risks of exclusion and inadequate stakeholder engagement</u></p> <ul style="list-style-type: none"> • Ensure early and continuous engagement with affected and interested parties, including vulnerable and marginalized groups, particularly women's groups and Persons with Disability organizations (PwDs). • Monitor beneficiary data disaggregated by gender, disability status, and geography to track inclusion. • Ensure the Grievance Mechanism (GM) is accessible, anonymous, and available to all, including people with disabilities, and includes procedures to report exclusion or favoritism. • Raise awareness among beneficiaries about their right to participate, how to file complaints, and how decisions are made on participation and support. 	
handicrafts Subprojects (embroidery, woodworking, tailoring, ceramics, pottery, Handmade Candles, accessories, and mosaics , etc.)	<ol style="list-style-type: none"> 1. OHS Risks due to cuts, burns, or injuries from sharp tools and machinery, exposure to harmful fumes, dust, or chemicals used in crafting 2. Pollution from waste materials like fabric scraps, wood shavings, and dyes, adhesives 3. Environmental impacts (noise, dust, odors) 4. safety hazards for communities due 	<ol style="list-style-type: none"> 1. <u>Occupational Health and Safety</u> <ul style="list-style-type: none"> - Provide training on the proper operation of machinery and safe handling of sharp tools. - Use appropriate PPE such as gloves, masks, cut-resistant gloves, safety goggles and eye protection during chemical and handling sharp tools or machinery - Install safety covers and locks on machines and power tools to prevent accidental contact with moving parts. - Ensure regular maintenance and inspection of machinery and tools to identify and repair potential safety issues before they lead to accidents. 2. <u>Pollution Prevention</u> <ul style="list-style-type: none"> - Ensure that continuous natural or mechanical ventilation is provided preferably with an electric exhaust fan—especially during burning operations or when using chemicals (such as paints or dyes) to reduce exposure to harmful fumes. - Follow safety guidelines for the storage, transport, and distribution of chemicals to minimize the potential for misuse, spills, and accidental human exposure including: <ul style="list-style-type: none"> - Store chemicals in a designated, secure, and well-ventilated area away from living areas and water sources. - Use appropriate PPE such as gloves, masks, and eye protection during chemical handling. - Separate pesticides and chemical waste from general household or other agricultural waste. - Dispose of empty containers according to LGUs and EQA regulations 	Implementation Beneficiaries / NGOs Supervision NGOs Monitoring MoPIC, NDC

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
	<p>to improper disposal of solid waste</p> <p>5. Hazardous materials and waste</p> <p>6. Life and fire safety risks</p> <p>7. Labor Rights and Working Conditions</p> <p>8. Risks of GBV (SEA/SH)</p> <p>9. Risks of exclusion and inadequate stakeholder engagement</p>	<ul style="list-style-type: none"> - Avoid disposing of chemicals near water storage or on open ground - In case of a spill, immediately isolate the area to prevent further contamination, and use absorbent materials (e.g., sawdust, sand) to contain and clean up spills. <p>3. <u>Noise, Dust, and Odors</u></p> <ul style="list-style-type: none"> - Use low-noise machinery and tools where possible. - Regularly maintain and lubricate machinery to reduce operational noise. - Provide hearing protection (e.g., earplugs or earmuffs) to workers exposed to sustained noise. - Conduct regular cleaning of workspaces and floors to minimize dust accumulation. - Install basic ventilation or extraction systems in workshops to manage dust emissions, particularly in woodworking, ceramics, and pottery activities. - Provide dust masks and ensure proper fitting and usage among workers involved in dust-generating activities. - Use environmentally friendly materials, paints, solvents, and adhesives with low odor and VOC content where feasible. - Ensure good ventilation in working spaces to quickly dissipate odors and reduce fumes buildup. - Store materials generating strong odors in sealed containers in a well-ventilated area. <p>4. <u>Disposal of Waste and Community Health and Safety</u></p> <ul style="list-style-type: none"> - clearly label bins or containers for different types of waste, and educate workers on correct segregation procedures. - arrange for regular and proper disposal of waste at authorized municipal disposal sites or recycling facilities. - Prohibit open dumping or burning of waste and clearly communicate these prohibitions to all workers and workshop owners/operators. - Regularly inspect and maintain waste storage areas to prevent accidental scattering of waste materials, reducing potential safety risks and environmental contamination. - Raise community and workers' awareness about the environmental and safety implications of improper waste disposal, using clear signage, orientation sessions, or awareness campaigns. - Establish and clearly mark designated waste disposal areas that are safe, secure, and away from community-sensitive locations. - Ensure buildings used for production are structurally safe, well-ventilated, and accessible. <p>5. <u>Hazardous Materials and Waste</u></p>	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Implement the General EHS Guidelines on Hazardous waste management, ESS3, and adhere to the Palestinian Hazardous Waste Management system No.6 of 2021 related to the specific hazardous material and waste being managed. - Hazardous material safety datasheet has to be followed. - Hazardous waste shall be stored in specific separate locations and have to be clearly marked. - Train all workers expected to handle hazardous waste on emergency procedures and safe handling practices. - Ensure all workers are familiar with hazardous waste warning sign - Follow national laws for disposal of agrochemical containers (e.g., pesticide bottles) <p>6. <u>Life and fire safety risks</u></p> <ul style="list-style-type: none"> - Train workers involved in practical safety measures during production. - Install and regularly maintain appropriate fire extinguishers that comply with Civil Defense requirements, taking into account the area size and associated fire risks. - Store all materials away from the burning ovens to prevent potential fire risk and excessive heat exposure. <p>7. <u>Labor Rights and Working Conditions</u></p> <ul style="list-style-type: none"> - All workers should be covered by a valid insurance. - Code of conduct should be oriented for workers and signed by all of them. - Complaints channels should be available for workers - Beneficiaries and NGOs shall adhere to the minimum wage act No.4 of 2021. <p>8. <u>Risks of GBV (SEA/ SH)</u></p> <ul style="list-style-type: none"> - Conduct mandatory SEA/SH training for NGO staff and beneficiaries. - Ensure the project Code of Conduct (CoC) includes strong provisions prohibiting any form of sexual harassment, exploitation, or abuse, and that it is explained and signed by all project staff and participants. - Ensure that the GM includes accessible, anonymous, and survivor-centered uptake channels including SEA/SH referral pathways. <p>9. <u>Risks of exclusion and inadequate stakeholder engagement</u></p> <ul style="list-style-type: none"> - Ensure early and continuous engagement with affected and interested parties, including vulnerable and marginalized groups, particularly women's groups and Persons with Disability organizations (PwDs). 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Monitor beneficiary data disaggregated by gender, disability status, and geography to track inclusion. - Ensure the Grievance Mechanism (GM) is accessible, anonymous, and available to all, including people with disabilities, and includes procedures to report exclusion or favoritism. - Raise awareness among beneficiaries about their right to participate, how to file complaints, and how decisions are made on participation and support. 	
Cosmetics	<ol style="list-style-type: none"> 1. Misuse of chemicals and use of uncertified raw material. 2. OHS risk include skin irritation or respiratory issues due to prolonged exposure to chemicals, fire hazards from flammable materials during production processes, allergic reactions to certain cosmetic components. 3. Pollution risks associated with chemical and packaging waste and exposure risks for communities due to improper disposal of waste and impacting aquatic ecosystems and biodiversity 	<ol style="list-style-type: none"> 1. <u>Misuse of chemicals</u> <ul style="list-style-type: none"> - Adhere to national requirements and regulations for beauty products and raw material (MoH, PSI, MoNE) - Ensure safe storage and labeling of tools, raw materials, and any chemical inputs. 2. <u>Occupational Health and Safety</u> <ul style="list-style-type: none"> - Provide training on the proper operation of machinery and safe handling of sharp tools. - Use appropriate PPE such as gloves, masks, safety goggles, protective clothing and eye protection during chemical handling. - Ensure proper ventilation in enclosed production spaces (especially for beauty products and soap processing). - Ensure workers are enrolled in occupational injury insurance. 3. <u>Waste Management & Pollution Prevention</u> <ul style="list-style-type: none"> - Classify and separate non-hazardous (organic, packaging) and hazardous waste (e.g., expired chemicals, dyes, cosmetic byproducts). - Prohibit open burning or unsanctioned disposal of solid or liquid waste. - Coordinate with LGUs or Joint Services Councils for regular waste collection and proper disposal at approved sites. - Use containers with secure lids for temporary waste storage. - Follow safety guidelines for the storage, transport, and distribution of chemicals to minimize the potential for misuse, spills, and accidental human exposure including: <ul style="list-style-type: none"> o Store chemicals in a designated, secure, and well-ventilated area away from living areas and water sources. o Keep all flammable materials away from open flames, sparks, and other ignition sources o Use appropriate PPE such as gloves, masks, and eye protection during chemical handling. Avoid disposing of chemicals near water storage or on open ground 	Implementation Beneficiaries/ NGOs Supervision NGOs Monitoring MoPIC, NDC

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
	4. Life and Fire Safety 5. Labor Rights and Working Conditions 6. Risks of GBV (SEA/SH) 1. Risks of exclusion and inadequate stakeholder engagement	<ul style="list-style-type: none"> ○ In case of a spill, immediately isolate the area to prevent further contamination, and use absorbent materials (e.g., sawdust, sand) to contain and clean up spills ○ Based on the size of the work area, install an appropriate fire suppression system and ensure that sufficient fire extinguishers are readily available and properly maintained. ○ Conduct regular training on safe chemical handling and fire safety procedures, including proper storage, use of PPE, and emergency response actions. <p>4. <u>Life and Fire Safety Risks</u></p> <ul style="list-style-type: none"> - Ensure installation of fire extinguishers and smoke detectors in enclosed or production spaces - Clearly label and maintain accessible emergency exits. - Prohibit storage of flammable materials (e.g., alcohols, oils) near heat sources or open flames. - Train beneficiaries on basic fire safety, emergency response procedures, and use of fire extinguishers. - Store flammable or combustible materials in fire-rated cabinets or containers. - Ensure all electrical systems and equipment used are safe, grounded, and regularly inspected. - Avoid overloading power sockets or using damaged cables and extension cords. - Ensure flammable materials and chemicals are securely stored away from residential areas, keep working fire extinguishers readily accessible, and conduct regular fire safety training to reduce risks for nearby residents. <p>5. <u>Labor Rights and Working Conditions</u></p> <ul style="list-style-type: none"> - All workers should be covered by a valid insurance. - Code of conduct should be oriented for workers and signed by all of them. - Complaints channels should be available for workers - Beneficiaries and NGOs shall adhere to the minimum wage act No.4 of 2021. <p>6. <u>Risks of GBV (SEA/SH)</u></p> <ul style="list-style-type: none"> • Conduct mandatory SEA/SH training for NGO staff and beneficiaries. • Ensure the project Code of Conduct (CoC) includes strong provisions prohibiting any form of sexual harassment, exploitation, or abuse, and that it is explained and signed by all project staff and participants. • Ensure that the GM includes accessible, anonymous, and survivor-centered uptake channels including SEA/SH referral pathways. 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<p>7. <u>Risks of exclusion and inadequate stakeholder engagement</u></p> <ul style="list-style-type: none"> • Ensure early and continuous engagement with affected and interested parties, including vulnerable and marginalized groups, particularly women's groups and Persons with Disability organizations (PwDs). • Monitor beneficiary data disaggregated by gender, disability status, and geography to track inclusion. • Ensure the Grievance Mechanism (GM) is accessible, anonymous, and available to all, including people with disabilities, and includes procedures to report exclusion or favoritism. • Raise awareness among beneficiaries about their right to participate, how to file complaints, and how decisions are made on participation and support. 	
Digital Subprojects	<ol style="list-style-type: none"> 1. Improper management of E-Waste 2. Life and fire safety risk 3. OHS risks including ergonomic risks 4. Labor Rights and working conditions. 5. Risks of GBV (SEA/ SH) 6. Risks of exclusion and inadequate stakeholder engagement 	<ol style="list-style-type: none"> 1. <u>E- Waste Management</u> Manage E- waste according to Cabinet Decision No. 2 of 2021 and Hazardous waste management bylaw No.6 of 2021 including <ul style="list-style-type: none"> - Select technologies and equipment based on international standards to maximize their lifetime and minimize associated risks at their end-of-life stage - Identify, label, and segregate of e-waste at source - Keep records of E-waste description and quantities - Reuse, recycling, and recovery of suitable waste - Temporary store of E-waste on a designated place in the ministry, transport and dispose according to national requirements 2. <u>Life and fire safety risks</u> <ul style="list-style-type: none"> - Train workers on safety measures - Install and regularly maintain appropriate fire extinguishers that comply with Civil Defense requirements, taking into account the area size and associated fire risks. 3. <u>OHS and Ergonomics:</u> <ul style="list-style-type: none"> - Ensure access to working stations that accommodate the different needs of workers. - Ensure safe placement of wires and electronic devices to avoid trip hazards and ensure clear walkways. - Instruct workers to report discomfort or symptoms early (e.g., wrist pain, back pain, headaches) for timely attention. 5. <u>Risks of GBV (SEA/ SH)</u> <ul style="list-style-type: none"> - Conduct mandatory SEA/SH training for NGO staff and beneficiaries. - Ensure the project Code of Conduct (CoC) includes strong provisions prohibiting any form of sexual harassment, exploitation, or abuse, and that it is explained and signed by all project staff and participants. 	<p>Implementation Beneficiaries/ NGOs Supervision NGOs Monitoring MoPIC, NDC</p>

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> - Ensure that the GM includes accessible, anonymous, and survivor-centered uptake channels including SEA/SH referral pathways. <p><u>6. Risks of exclusion and inadequate stakeholder engagement</u></p> <ul style="list-style-type: none"> - Ensure early and continuous engagement with affected and interested parties, including vulnerable and marginalized groups, particularly women's groups and Persons with Disability organizations (PwDs). - Monitor beneficiary data disaggregated by gender, disability status, and geography to track inclusion. - Ensure the Grievance Mechanism (GM) is accessible, anonymous, and available to all, including people with disabilities, and includes procedures to report exclusion or favoritism. - Raise awareness among beneficiaries about their right to participate, how to file complaints, and how decisions are made on participation and support. 	
Component 3: MoPIC and PA Capacity Building			
<p>A. MoPIC Support Activities:</p> <ul style="list-style-type: none"> • Establish a Project Management Unit (PMU) for MoPIC • acquisition of goods and services • outreach and communication • monitoring and evaluation <p>B. MoL Support Activities</p> <ul style="list-style-type: none"> • Recruitment of specialist IT consultants • IT hardware and software 	<ol style="list-style-type: none"> 1. Improper disposal of packaging material 2. Improper management and disposal of E-waste 3. In case that some equipment's need installation works the following potential risks are identified: <ol style="list-style-type: none"> A. Dust and noise generation B. Generation of small amount of construction waste C. Generation of waste of packing material 	<p><u>1. Packaging Waste Management</u></p> <ul style="list-style-type: none"> - Collect packing waste in a designated area separated from other waste. Dispose the waste according to municipal instructions and regulations <p><u>2. E-Waste Management</u></p> <p>Manage E- waste according to Cabinet Decision No. 2 of 2021 and Hazardous waste management bylaw No.6 of 2021 including</p> <ul style="list-style-type: none"> - Select technologies and equipment based on international standards to maximize their lifetime and minimize associated risks at their end-of-life stage - Identify, label, and segregate of e-waste at source - Keep records of E-waste description and quantities - Reuse, recycling, and recovery of suitable waste - Temporary store of E-waste on a designated place in the ministry, transport and dispose according to national requirements <p><u>3. Installation work risks</u></p> <ul style="list-style-type: none"> - Install barriers and / or implement measures to segregate the work area. Schedule activities to avoid peak hours - Manage construction and demolition waste in line with national policies including Decision No.16 of 2023 regarding construction and demolition waste including Sort construction waste and store in a specific. Dispose in the municipalities designated area - Ensure all workers are following health and safety measures, Ensure all worker's use Ensure all workers are trained in trained in term of OHS measures. 	<p>Implementation Beneficiary Agencies (MoL, MoA, MoPIC, MoLG)</p> <p>Supervision & Monitoring MoPIC PMU</p>

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
<ul style="list-style-type: none"> • training to LGU employees MoL staff training <p>C. MOLG Support Activities</p> <ul style="list-style-type: none"> • Training for MoLG Staff • Provision of Goods, Services, and Staffing • Technical Assistance <p>D. MoA Support Activities</p> <ul style="list-style-type: none"> • Production of national guidelines for quality assurance • training for MoA staff and agribusinesses 	<p>D. OHS risk due to cuts, burns, or injuries from sharp tools and machinery, exposure to harmful dust, or chemicals</p> <p>4. Labor rights and working conditions for</p> <p>5. OHS Risks</p> <p>6. GBV (SEA/SH)</p> <p>7. Lack of appropriate channels for grievances.</p> <p>8. Insufficient stakeholder engagement</p>	<p><u>4. Labor Rights and Working Conditions</u></p> <ul style="list-style-type: none"> - All workers should be covered by a valid insurance. - Code of conduct should be oriented for workers and signed by all of them. - Complaints channels should be available for workers. - Comply with the Palestinian labor law and civil service law for civil servants. <p><u>5. Occupational Health and Safety</u></p> <ul style="list-style-type: none"> - Ensure all installation workers receive orientation and training on safe handling of tools, materials, and electrical components. - Use appropriate PPE, such as gloves, hard hats, safety shoes, eye protection, and masks (especially when dust or fumes are present). - Install warning signs and isolate the installation area to prevent unauthorized access or accidents involving office staff. - Maintain clear walkways and emergency exits during installation. - Ensure all equipment is properly grounded and that tools are inspected before use. - Provide fire extinguishers and ensure workers know their locations and how to use them. - Avoid installation works during peak office hours, if feasible, to minimize disruptions and reduce risk to non-workers. - Assign a supervisor to oversee installation activities and ensure compliance with safety protocols. - Ensure first-aid kits are readily available, and personnel are aware of emergency contacts. <p><u>6. Risks of GBV (SEA/ SH)</u></p> <ul style="list-style-type: none"> - Ensure the project Code of Conduct (CoC) includes strong provisions prohibiting any form of sexual harassment, exploitation, or abuse, and that it is explained and signed by all project staff and participants. - Ensure that the GM includes accessible, anonymous, and survivor-centered uptake channels including SEA/SH referral pathways. <p><u>7. GM:</u></p> <ul style="list-style-type: none"> - Strengthen, update, and maintain the project-level GM in MoPIC in line with the ESCP requirements and as detailed in the SEP. - Integrate measures and clauses to ensure the uptake and processing of anonymous grievances. - Disclose the GM and ensure highlighting it during stakeholder engagement activities. 	

Potential Subprojects / Activities	Risks and Impacts	Mitigation Measures	Responsibility
		<u>8. stakeholder engagement</u> <ul style="list-style-type: none"> - Ensure early and continuous engagement with affected and interested parties. - Ensure the Grievance Mechanism (GM) is accessible, anonymous, and available. - Raise awareness among beneficiaries about their right to participate, how to file complaints, and how decisions are made on participation and support. 	
Component 4: Contingency Emergency Response Component (CERC)			
Risks associated with this component depend on the scope of the activities included in the CERC component		Implement the E&S provisions of the CERC Manual including, if applicable, any assessments and plans required therein.	MoPIC/PMU

5. The Environmental And Social Mitigation Measures

In line with ESS 1, for the elaboration and implementation of the environmental and social mitigation measures, the project is adopting the following mitigation hierarchy approach:

1. Anticipate and avoid risks and impacts;
2. Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;
3. Once risks and impacts have been minimized or reduced, mitigate;
4. Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

For the identified E&S risks and impact as described in the previous Chapter, the following mitigation measures should be addressed. Additionally, best practices are available in [Annex 4](#) in the Environmental and Social Codes of Practice (ESCAP), these aim to assist in managing and mitigating potential negative environmental impacts. The ESCOPs contain specific, detailed and tangible measures that would mitigate the potential impacts of each type of eligible subproject activity under the project. They are marked as relevant for the planning phase, the implementation phase, or the post-implementation phase of activities. They are intended to be simple risk mitigation and management measures, readily usable to the Borrower and contractors.

5.1. Generated Non-Hazardous Waste

Waste management plan should be prepared for sub-project which has substantial impact of waste management. For sub-project with low-moderate impact, proper mitigation measures will be incorporated in the ESMP or ESMP checklist.

The waste management plan will assure safe management of wastes during the project-life cycle. There are two essential prerequisites to ensure that the plan is implemented – sufficient staff and financial resources. The plan covers all waste life cycle, i.e from generation, storage, collection, transportation and finally safe treatment or disposal. It is anticipated that solid waste will comprise of paper, wood, plastic, scrap metals, and glass. The overall volume is expected to be moderate.

Generation: Solid waste generated during construction mainly consists of municipal and construction wastes shall be stored in a separate container. Waste should be separated from hazardous waste. In addition, as some waste can be reused, then segregation of waste should be carried out. For example, wood wastes will be given to factories that re-shape them and make them usable for fireplaces for residential purposes

Collection: Solid waste will be collected by contractor in coordination with local Joint Service Council for the approved landfill

Disposal: collected waste should be disposed of in an authorized landfill.

A waste management procedure will be revised to be aligned with national policies including Decision No.16 of 2023 regarding construction and demolition waste and the Palestinian National solid waste management strategy

5.2. Generated Hazardous Waste

Hazardous Wastes: Sub-project activities are anticipated to generate hazardous wastes like comprise of fuel, oils, lubricants, hydraulic/insulating fluids and batteries, tires, metal drums and empty chemical containers, PV panels, scrap metals, plastic, batteries, metal drums, old meters and glass. Mitigation measures will be implemented proportional to the anticipated risk of hazardous wastes generation; hazardous wastes management plan will be prepared in compliance with Basel Convention and EQA requirements for sub-projects with substantial risk of hazardous wastes generation. Proper mitigation measures related to hazardous wastes will be incorporated in the ESMP or ESMP checklist for sub-projects with moderate risk of hazardous wastes generation.

According to article 12 of the Palestinian Environmental Law, the law forbids any one from handling (manufacturing, storing, distributing, using, treating, disposing) hazardous materials or waste except according to the regulations and instructions determined by the Ministry (EQA) in coordination with the competent parties. Therefore, it is essential to have a hazardous waste management plan that consists of the following:

- Any hazardous generated as a result of any activity during construction or by the end of the project life should be stored in separate containers. The containers should be labeled as "Hazardous waste". Labelling system should be clear and well known to the public and workers to ensue general safety.
- Transportation of the hazardous waste container should be with special vehicle by special contractor. Before the start of transporting this hazardous waste, a form should be filled by the generator and transporter indicating the amount and type of hazardous waste.
- Trans- boundary of hazardous waste is not allowed unless a written permission is issued by EQA. The permission complies with Basel convention requirements.
- A hazardous waste record keeping should be created and checked by environmental specialist from time to time to make sure that hazardous waste is well managed.
- Disposal of the PV panels and other hazardous waste will be according to EQA hazardous waste management regulations that meet Basel convention requirements.
- Existing technical facilities for treating and disposing of hazardous waste should be assigned before the start of the project.
- For emergency cases, all workers expected to be in contact with hazardous waste should be trained for safe handling of hazardous waste.
- All workers should be familiar with hazardous waste warning signs

5.3. Traffic Management

In order to carry out the construction, maintenance works, Contractor or municipality or LGU may close or divert certain specified roads, either permanently or temporarily. The Municipality or LGU should arrange diversions for providing alternative routes for transportation and/or pedestrians.

After breaking up, closing or otherwise interfering with any street or footpath to which the public has access, the Municipality or LGU shall make such arrangements as may be reasonably necessary so as to cause as little interference with the traffic in that street or footpath during implementation of the construction works as shall be reasonably practicable. Wherever construction works interfere with existing public roads or other ways over which there is a public right of way for any traffic, the Contractor shall construct diversion ways wherever possible.

The Contractor, or municipality or LGU shall provide, erect and maintain traffic signs, road markings, barriers and traffic control signals and other measures that may be necessary for ensuring traffic safety around construction sites.

The Contractor, or municipality or LGU shall not commence any work that affects the public roads and highways until all traffic safety measures necessitated by the work are fully operational.

The Contractor, or municipality or LGU moving solid waste materials shall take strict measures to minimize littering of roads by ensuring that vehicles are licensed and loaded in such a manner as to prevent falling off or spilling of construction materials and by sheeting the sides and tops of all vehicles carrying mud, sand, and other materials and debris. Construction materials should be brought from registered sources in the area and debris should be transferred to assigned places in landfills with documented confirmation.

5.4. Pollution Prevention

Air Pollution: Risk of air quality deterioration during construction and rehabilitation of the project, is mainly due dust generation during earthworks, construction in addition to transportation of material. Though the following measures should be addressed during the sub-project implementation:

- Dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosure at site
- Vehicles transferring material to be properly covered.
- Work activities causing dust generation should be avoided during windy days.
- During interior installation, installing dust screen enclosure at site Demolition, debris shall be kept in controlled area and sprayed with water mist to reduce debris dust
- The surrounding environment shall be kept free of debris to minimize dust.
- Machinery emissions should be within the Palestinian acceptable standards and store construction materials in pre-identified storage areas. Cover friable materials during storage. Wet the network of unpaved roads on site. Regulation of speed to a suitable speed limit (20 km/h) for all vehicles entering/ passing through the project site and promptly repair vehicles with visible exhaust fume.
- There will be no excessive idling of construction vehicles at sites

Noise and Dust Control: The Contractor, or municipality or LGU shall take all practicable measures to minimize nuisance from dust and noise from the rehabilitation sites. This includes:

- Respecting normal working hours in or close to residential areas;
- Maintaining equipment in a good working order to minimize extraneous noise from mechanical vibration, creaking and squeaking, as well as emissions or fumes from the machinery;

- Shutting down equipment when it is not directly in use.

Indoor Noise disturbance

- For noise-producing equipment or workstations (e.g., heavy woodworking machines or grinding tools), set up physical barriers or noise-absorbing partitions to reduce sound
- Mount machinery on vibration isolators or pads. This reduces noise generation from mechanical vibrations that tend to amplify sound both indoors and to the surrounding environment.
- If possible, Incorporate acoustic insulation in walls, ceilings, and floors of the indoor work area. Use sound-absorbing finishes such as acoustic ceiling tiles or wall panels to lower noise reflections within enclosed spaces.
- Plan and adjust work schedules to avoid high-noise activities during early mornings, evenings, weekends, or other times when residential areas are more sensitive. This helps minimize disturbances for the surrounding community while allowing for efficient production during permitted hours.

Regarding Dust control, Contractor, or municipality or LGU is asked to provide a water tanker, and apply water spraying when required to minimize the impact of dust.

Indoor Air Pollution

- When working on indoor projects —whether it's embroidery, pottery, or any craft—make sure the workspace stays fresh by opening a window or using a small fan, and keep the area clean by gently wiping surfaces with a damp cloth to reduce dust buildup.
- . Where feasible, design production areas as enclosed or semi-enclosed spaces to confine dust and fumes. Use air curtains, partitioning, or physical barriers to limit the escape of pollutants to adjacent community space
- Ensure that continuous natural or mechanical ventilation is provided preferably with an electric exhaust fan—especially during burning operations or when using chemicals (such as paints or dyes) to reduce exposure to harmful fumes.

5.5. Cultural Heritage

LGUs subprojects' civil works involving excavations should normally incorporate procedures for dealing with situations in which buried Physical Cultural Resources (PCR) are unexpectedly encountered. The final form of these procedures will depend upon the local regulatory environment, including any chance find procedures already incorporated in legislation dealing with antiquities or archaeology. For project components, chance finds procedures contain the following elements:

- **PCR Definition:** The definition of PCRs includes any movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. PCRs may be located in urban or rural settings, and may be above or below ground, or under water.
- **Recognition:** A clause on chance finds should be included in general specifications section of the bidding document of sub-project or LGUs grant agreements.
- **Chance Find Procedures:** In case of accident findings of any antiquities or PCRs that might occur during the implementation of the subproject, the contractor, and LGUs must notify ESO/MDLF who will immediately liaise with appropriate officials from MoTA. According to the applicable Jordanian Heritage law No. 51 for the year 1966, Article 15. MDLF must stop the contractor, and LGUs and notify MoTA within 3 days to take necessary actions.

In addition, the contractor should be familiar with the following “Chance Finds Procedures” in case accident chance find of any culturally valuable materials during excavation:

- Stop work immediately following the chance find of any possible archeological, historical, paleontological, or other cultural value; inform the ESO;
- Protect artifacts as well as possible using plastic covers; implement measures to stabilize the area, if necessary, to properly protect artifacts;
- Prevent and unauthorized access where finding occurred; and
- Restart construction works only upon the authorization of the relevant authorities.

5.6. Biodiversity Conservation

The project involves small-scale activities in urban and semi-urban areas, support for micro-women CBOS, and supply of equipment, potential risks of impacting biodiversity and natural habitats from activities involving the infrastructure works under component 1 or the agricultural practices under component 2 are expected to be limited and insignificant. The ESMF identifies exclusion of activities that may generate significant impact on biodiversity conservation. Where further risk of biodiversity will be assessed under the site-specific ESMFs where the mitigation hierarchy approach will be applied as needed. In addition, during project implementation; the Contractor, or LGUs shall avoid the loss of trees and damage to other vegetation wherever possible. Adverse effects on green cover within or in the vicinity of construction sites shall be minimized. The Contractor, or LGUs will restore vegetative cover, where feasible.

5.7. GBV, SEA/SH Risks and Impacts

Given the project's scope and the direct interaction between workers, community members, NGOs, and beneficiaries—especially women, PwD, and vulnerable groups—there is a risk of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH). These risks could potentially arise during the implementation phases, including construction, training sessions, implementation, and other project activities. To effectively manage and mitigate GBV (SEA/SH) risks, the project will adopt the following comprehensive measures:

- **Policy and Codes of Conduct**
 - The project will have a GBV-sensitive Code of Conduct (CoC) that explicitly prohibits any form of GBV, SEA, or SH, clearly outlining unacceptable behaviors and associated disciplinary measures.
 - Ensure all project workers, consultants, contractors, subcontractors, and NGO partners are oriented on the CoC and understand the implications of non-compliance, with mandatory signature of acknowledgment by all project-related personnel.
- **Training and Capacity Building**
 - Include GBV and SEA/SH awareness and sensitization as part of the project E&S training sessions for all project staff, including PMU, LGUs, contractors, subcontractors, consultants, NGO staff, and any other personnel engaged in project activities.
- **Survivor-Centered Grievance Mechanism**

- Establish or strengthen existing Grievance Mechanisms (GMs) at both the project (MoPIC, MDLF, NDC) and local (LGU, NGO) levels, ensuring specific, accessible, confidential, and culturally appropriate referral channels dedicated to receiving GBV/SEA/SH complaints.
 - Ensure confidentiality and anonymity provisions in reporting and responding to GBV cases, providing survivors with confidence that their grievances will be addressed respectfully and discreetly.
 - Clearly communicate and disseminate information about GM availability and the process for filing complaints, particularly highlighting how GBV-related grievances can be submitted and handled during all consultation and engagement activities in line with the project SEP.
- **Referral Pathways and Survivor Support**
 - Establish effective referral pathways by collaborating with local specialized service providers.
 - Ensure referral pathways and procedures are clearly communicated and widely disseminated through various means and as detailed in the project SEP.
 - **Monitoring and Reporting**
 - Systematically monitor and track GBV-related grievances and cases, maintaining secure records while protecting survivor confidentiality.
 - Regularly report GBV incidents, response actions, and mitigation effectiveness as part of routine project reporting, with anonymized data to protect the privacy and safety of survivors.

5.8. Labors Rights and Working Conditions

Labor Rights: The project emphasizes compliance with national labor legislation and ESS2 , specifically focusing on rights associated with fair wages, working hours, non-discrimination, freedom of association, and prevention of child and forced labor. The ESMF entails [Simplified Labor Management Procedures \(LMP\) in Annex 7](#). The project will enforce and monitor the following measures to safeguard labor rights:

- Compliance with Labor Legislation and the Labor Management Procedures
 - Ensure all project workers are contracted and employed according to Palestinian Labor Law No. 7 of 2000, its amendments, and associated regulations.
 - Adhere strictly to the Palestinian Minimum Wage Act (Act No. 4 of 2021), ensuring that no worker is paid below the minimum wage.
 - Adhere to the labor management procedures provided in Annex 7.
- Freedom of Association and Collective Bargaining
 - Recognize workers' right to freedom of association, and collective bargaining, allowing workers to freely join and participate in unions without fear of discrimination or reprisal.
- Prohibition of Child Labor and Forced Labor
 - Prohibit and report child labor as defined in ESS2 and national legislation.
 - Strictly prohibit forced or compulsory labor in all project activities, regularly monitoring workplaces for compliance.
- Non-discrimination and Equal Opportunity

- Enforce zero tolerance towards discrimination based on gender, age, disability, ethnicity, religion, or any other characteristic in hiring, wage distribution, promotion, training, and other employment practices.
- Transparent Contractual Arrangements
 - Ensure all workers have clear, transparent, and written contracts outlining terms of employment, wages, hours of work, job descriptions, rights, and responsibilities.
 - Provide all workers with understandable and accurate information regarding their employment conditions prior to employment.
- Capacity Building and Awareness Raising
 - Provide targeted training sessions for contractors, NGOs, project management staff, and workers on their rights under national labor law, ESS2 standards, and project-specific labor rights policies.

Occupational Health and Safety (OHS): All potential risks to project workers' health and safety will be identified by all parties who employs workers. Based on the anticipated OHS risk of the project; the contractors, LGUS will need to implement the OHS action including measures identified in the ESMP/ ESMP checklist or procurement conditions to the contractor or agreement conditions to beneficiaries to prepare and implement OHS plan 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.

In order to ensure workers' Health and Safety procedures, project workers will receive OHS training relevant to the sector of the project and based on the hazard risk assessment identified for the site. the 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. Records on the training and toolbox checks will be reported and kept on file. These records will include a description of the orientation, the number of hours of orientation provided, orientation attendance records, and results of evaluations.

Working Conditions: Adequate working conditions encompass occupational health and safety (OHS) as detailed above, reasonable working hours, suitable workplace environments, and provision of necessary resources and amenities. The project will rigorously adhere to Palestinian Labor Law No. 7 of 2000, relevant national legislation, and the World Bank's ESS2 requirements regarding working conditions. The following measures will be implemented and monitored to guarantee acceptable working conditions for all project workers:

- Safe and Healthy Work Environment:
 - Maintain a safe, clean, and organized work environment, including adequate lighting, ventilation, sanitation facilities, drinking water, and shaded rest areas to ensure comfort, hygiene, and safety.
 - Ensure workplaces and facilities are accessible, particularly considering the needs of persons with disabilities and women.
- Reasonable Working Hours and Rest Periods:
 - Comply strictly with the national labor law regarding working hours, breaks, rest periods, overtime, and annual leave provisions.

- Ensure adequate rest periods and breaks, particularly for physically demanding activities, preventing fatigue-related incidents and ensuring overall worker well-being.
- Emergency Preparedness and Response:
 - Develop, implement, and regularly practice site-specific emergency response plans depending on the project activities covering medical emergencies, accidents, fires, chemical spills, and other potential workplace hazards.
 - Clearly mark and maintain emergency evacuation routes, exits, and assembly points. Regularly communicate these procedures to all workers.
- Provision of Insurance and Medical Care:
 - Ensure that all workers are covered by occupational injury and health insurance policies, consistent with Palestinian national regulations.
 - Maintain availability of first-aid kits and provide basic medical response training for designated staff to respond swiftly and effectively in emergency situations.
- Proper Facilities for Workers:
 - Provide adequate sanitary and hygiene facilities (e.g., toilets, washbasins, showers), segregated by gender as needed, ensuring privacy, cleanliness, and accessibility.
 - Ensure availability of potable water and suitable eating areas or dining facilities that are safe, clean, and comfortable.
- Training and Awareness Raising:
 - Regularly conduct tailored awareness sessions and refresher trainings for all workers and supervisors on workplace safety, workers' rights, emergency procedures, and grievance mechanisms.
 - Clearly display workplace safety instructions, emergency procedures, workers' rights, and grievance mechanism information in highly visible locations at each workplace.

Workers' Grievance Mechanism: A comprehensive Grievance Mechanism (GM) will be established and operated by MoPIC, MDLF, NDC, and their respective beneficiary partners (i.e., MoA, MoL, MoLG, LGUs, and NGOs) to effectively address and resolve grievances raised by all types of project workers in accordance with ESS2.

MDLF will maintain its existing Workers' GM and ensure beneficiary LGUs establish and operate their own project-specific workers' GM at the subproject level. NDC will assess, strengthen, update, and operate its existing Workers' GM, as detailed in its GM Manual, and will ensure beneficiary NGOs establish and operate their own GM for project workers. Similarly, MoPIC, along with its beneficiary partners (MoA, MoL, and MoLG), will establish and operate a workers' GM for their project workers.

For contracted workers, including contractor personnel, contractors will establish and maintain their own grievance mechanisms, proportionate to the scale, risks, and impacts of their activities, aligned with the project-level GM and ESS2 requirements. Contractors will inform contracted workers about their grievance mechanisms during the initial engagement and ensure these mechanisms are accessible, transparent, impartial, and protect against reprisals.

The Workers' GM will handle project-related grievances including but not limited to those concerning compensation, discrimination, occupational health and safety (OHS), gender-based violence

(GBV/SEA/SH), harassment, and working conditions. The grievance mechanism will incorporate the following features:

- Multiple accessible grievance uptake channels (e.g., complaint forms, suggestion boxes, emails, telephone hotlines).
- Clear and publicly disclosed procedures, timelines for grievance resolution, and grievance registration and tracking mechanisms.
- Designated staff trained to manage grievances effectively and sensitively, particularly GBV/SEA/SH complaints, in line with survivor-centered approaches.
- Regular monitoring, recording, and reporting of grievances by each implementing agency.

Code of Conduct (CoC): The Code of Conduct will be prepared and used for all sub-projects. All engaged workers shall be explained/oriented and know the details of CoC. The Code of Conduct shall be written in local language. CoC and provisions related to SEA/SH will be incorporated into the bidding documents. Code of Conducts is presented in Annex 7 as an example and can be edited to be appropriate with the nature of the sub-project activities and location. The CoC is to be signed by all project workers.

5.9. Stakeholder Engagement

Stakeholder engagement for the project will be guided by the existing Stakeholder Engagement Plan (SEP), prepared and disclosed as per ESS10 requirements. The SEP defines the approach and specific mechanisms to ensure effective and meaningful stakeholder participation throughout the project lifecycle. It outlines roles and responsibilities implementing agencies and beneficiary partners to engage all relevant stakeholders, including project affected parties, interested parties, vulnerable and marginalized groups.

5.10. Grievance Mechanism

The project-level Grievance Mechanism (GM) comprises multi-level mechanisms at each of the implementing agencies' operations (i.e. MoPIC, MDLF, and NDC). This GM aims to systematically receive, address, and resolve grievances raised by affected communities, stakeholders, and beneficiaries promptly and transparently throughout project implementation.

The GM structure clearly assigns responsibilities among MoPIC, MDLF, NDC, and their beneficiary partners (including LGUs and NGOs), ensuring accessibility, responsiveness, and cultural appropriateness. It incorporates multiple grievance channels including complaint forms, suggestion boxes, dedicated hotlines, emails, and direct personal communication with designated focal points.

The GM includes specific provisions and referral pathways to sensitively handle grievances related to GBV (SEA/SH), ensuring confidentiality, survivor-centered support, and timely referral to appropriate service providers.

Grievance records will be maintained systematically, documenting the receipt, investigation, resolution, and feedback provided to complainants, with clear timeframes established for grievance handling and resolution. MoPIC, through its designated Social Specialist, will oversee and monitor the implementation and effectiveness of the GM across all components, ensuring consistency and compliance with ESS10 standards.

Regular reporting on GM functionality and effectiveness will be incorporated into the project's progress reports, contributing to adaptive management and continuous improvement of stakeholder engagement practices.

5.11. Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups

Disadvantaged and vulnerable groups within the West Bank and Gaza Social Recovery and Job Creation Project have been identified in the SEP as including but are not limited to the following: unemployed and economically disadvantaged youth and workers and their dependents (including children and the elderly), PWD including disabled women, women-headed households, low-income families with women and/or PwD, women and PwD living in remote, Access Restricted Areas (ARAs), and areas impacted by hostilities, in addition to Bedouin communities. These groups face compounded barriers and heightened vulnerability due to limited economic opportunities, restricted access to project benefits, socio-cultural norms, physical barriers, communication challenges, and reduced capacity to participate effectively in consultation processes.

The identified risks specific to these disadvantaged and vulnerable groups include:

- Risk of exclusion: Disadvantaged and vulnerable groups might be excluded or unable to participate effectively in the project's consultations, activities, and benefits due to mobility constraints, inadequate access to information, and socio-cultural stigmas.
- Limited accessibility: Persons with disabilities face infrastructural and informational barriers limiting their physical access to consultation venues, project sites, and engagement materials.
- Socio-cultural barriers: Women and women-headed households may encounter socio-cultural norms that limit their public participation, exposure, and access to project benefits, including fears related to GBV (SEA / SH).
- Economic barriers: Economically disadvantaged groups and low-income families have fewer resources for accessing digital platforms, transportation, or other means required to engage with and benefit from the project.
- Physical and geographic barriers: Bedouin communities and populations in ARAs and conflict-affected zones experience limited access to communication infrastructure, security concerns, and logistical difficulties that hinder their engagement and benefit from the project.
- Insufficient engagement and information dissemination: There is a risk that vulnerable groups will not be adequately informed or engaged due to inappropriate or ineffective communication methods.

Mitigation measures tailored specifically for these identified risks are:

- Enhanced outreach and targeted communication:
- Implement tailored communication strategies and outreach campaigns using multiple formats, methods, and techniques as detailed in the project SEP.
-

- Ensure all project materials are culturally sensitive, gender-sensitive, and disability-inclusive, provided in accessible formats such as sign language, simplified text, large print, and braille where appropriate.
-
- Physical and logistical accessibility:
- Conduct consultations and meetings in accessible locations with universal design features to accommodate PwDs.
-
- Socio-cultural inclusivity and safety:
- Organize gender-sensitive and, where needed, women-only consultation sessions, particularly for Component 2 activities.
- Raise awareness and regularly communicate the availability of safe, anonymous grievance channels and GBV/SEA/SH referral pathways.
-
- Economic and digital inclusion:
- Simplify and streamline the application processes for accessing project benefits, providing options for offline or assisted application submission.
- Leverage local NGOs and CBOs as intermediaries to assist vulnerable groups in accessing information and submitting applications.
-

Tailored engagement approaches for geographically isolated groups:

- Utilize local representatives, community leaders, and trusted local NGOs/CBOs as intermediaries to disseminate project information and support engagement activities in remote and conflict-affected areas.
- Develop robust grievance mechanisms accessible via phone calls, SMS, and in-person channels, ensuring reliable uptake in areas lacking internet connectivity.

Strengthened monitoring and reporting:

- Monitor and evaluate the engagement and participation rates of disadvantaged and vulnerable groups, ensuring data is disaggregated by gender, age, disability, geographic location, and socio-economic status.
- Regularly review and adjust engagement strategies based on feedback received through established grievance mechanisms, stakeholder consultations, and ongoing monitoring data.

These mitigation measures will be integrated into the project's overall Environmental and Social Management Framework (ESMF) and Stakeholder Engagement Plan (SEP), ensuring consistent implementation, tracking, and accountability at all project levels.

5.12. Planning and Design Considerations for Avoidance of Environmental and Social Risks and Impacts

During initial screening, eligibility criteria are first applied to ensure that each subproject aligns with the overall program objectives and meets the required national regulations and environmental and social standards. Once a proposal satisfies these baseline requirements, it is further evaluated using a pre-defined exclusion list, which identifies any activities or subproject types with immitigable risks, ensuring that proposals with potentially adverse impacts are excluded early. The screening tool will assess risks, required mitigation measures and capacity to implement effective mitigation measures, such as ensuring

proper waste disposal, training and capacity building for project staff on environmental and social risk management and enhancing OHS standards and determine its capacity to implement effective safeguards. Additionally, Stakeholder engagement helps capture local insights on environmental and social sensitivities, while detailed monitoring plans are established to track the effectiveness of these mitigation measures throughout the project lifecycle.

6. Procedures and Implementation Arrangements

6.1. Environmental and Social Risk Management Procedures

The environmental and social risk management procedures will be implemented through the Project's subproject selection process. In summary, the procedures aim to do the following:

Table 5: Project Cycle and E&S Management Procedures

Project Stage	E&S Stage	E&S Management Procedures
a. Assessment and Analysis: Subproject identification	Screening	<ul style="list-style-type: none"> - During subproject identification, ensure subproject eligibility by referring to the Exclusion List in table 6,7,8 below. - For all activities, use the Screening Form to identify and assess potential environmental and social risks and impacts, and identify the appropriate mitigation measures for the subproject. - Identify the documentation, permits, and clearances required under the government's Environmental Regulation. <p>For Component 1 use the screening form in Annex 1 For Component 2 use the screening form in Annex 2 For Component 3 use the screening form in Annex 3</p>
b. Formulation and Planning: Planning for subproject activities, including human and budgetary resources and monitoring measures	Planning	<ul style="list-style-type: none"> - Based on Screening Form adopt and/or prepare relevant environmental and social procedures and plans. <p>For Component 1: For activities that are assessed of low or moderate E&S risks rating, ESMPs/ESMP checklists will be prepared, consulted and disclosed as per the sectorial ESMPs prepared under the ESMF. ESMP/ESMP checklists for subprojects/activities that are classified of substantial E&S risk rating will require prior review and clearance by the Bank. Other identified instruments, i.e. LALPs, shall also be reviewed and cleared by the Bank.</p> <p>For Component 2 and 3</p> <ul style="list-style-type: none"> - For activities requiring Environmental and Social Management Plans (ESMPs) or ESMP checklist submit for prior review and no objection by the World Bank prior to initiating bidding processes (for subprojects involving bidding processes) and/or launching activities (for subproject activities not subject to bidding). - Ensure that the contents of the ESMPs are shared with relevant stakeholders in an accessible manner and consultations are held with the affected communities in accordance with the SEP. - Complete all documentation, permits, and clearances required under the government's Environmental Regulation. - Train staff responsible for implementation and monitoring of plans. - Incorporate relevant environmental and social procedures and plans into contractor bidding documents; train contractors on relevant procedures and plans.

c. Implementation and Monitoring: Implementation support and continuous monitoring for projects	Implementation	<ul style="list-style-type: none"> - Ensure implementation of plans through site visits, regular reporting from the field, and other planned monitoring. - Track grievances/beneficiary feedback. - Continue awareness raising and/or training for relevant staff, contractors, communities.
d. Review and Evaluation: Qualitative, quantitative, and/or participatory data collection on a sample basis	Completion	<ul style="list-style-type: none"> - Assess whether plans have been effectively implemented. - Ensure that physical sites are properly restored. <p>Post E&S audit shall be conducted annually (to be financed by MoPIC) and submitted to the Bank for clearance. Corrective Action Plan (if and as required) shall be implemented throughout Project implementation.</p>

More detail for each stage is provided below.

6.1.1. Subproject Assessment and Analysis – E&S Screening for Component 1

As a first step, all proposed activities should be screened to ensure that they are within the boundaries of the Project's eligible activities, and they are not considered as activities listed on the E&S Exclusion List in the table below.

Table 6: Exclusion List - Component 1

<ul style="list-style-type: none"> • Support of production of any hazardous good, including alcohol, tobacco, and controlled substances • Any construction in protected areas or priority areas for biodiversity conservation, as defined in national law • Activities that have the potential to cause any significant loss or degradation of critical natural habitats, whether directly or indirectly, or which would lead to adverse impacts on natural habitats • Activities that involve extensive harvest and sale/trade of forest resources (post, timber, bamboo, charcoal, wildlife, etc.) for large-scale commercial purposes • Activities involving changing forestland into agricultural land or logging activities in primary forest • Purchase or use of banned/restricted pesticides, insecticides, herbicides, and other dangerous chemicals (banned under national law and World Health Organization (WHO) category 1A and 1B pesticides) • Activities that involve the use of international waterways • Any activity affecting physical cultural heritage such as graves, temples, churches, historical relics, archeological sites, or other cultural structures • Activities that may cause or lead to forced labor or child abuse, child labor exploitation or human trafficking, or subprojects that employ or engage children, over the minimum age of 14 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development • Any activity on land that has disputed ownership or tenure rights • Any activity that will cause physical relocation of households or will require the use of eminent domain • Any activity with significant environmental and social risks and impacts that require an Environmental and Social Impact Assessment (ESIA) • Subproject supports the purchase of pesticide and fertilizer • Sub-projects with E&S impacts that are high in magnitude and/or in spatial extent (the geographical area or size of the population likely to be affected is large to very large) • Sub-projects have a high probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.); • Sub-project includes any removal and resettlement of dwellings/ housing/ shelter

- Large scale sub-projects with high environmental and social risks as identified under the Palestinian Environmental Policy:
- Highways;
- Regional roads;
- Large scale wastewater treatment plants and wastewater trunks;
- Large scale desalination plants;
- Large scale power plants;
- Landfills; and
- Mega markets
- Supply of explosive and corrosive materials to be declined

All sub-project will be screened against the Project exclusion criteria:

- Where any of the subproject or part of the sub-project activities fall under the exclusion criteria, the sub-project will be rejected, or recommendations to only exclude the activity if it doesn't affect the project feasibility.
- Where the sub-project or/and the activities are of eligible nature, the sub-project will be environmentally and socially assessed.
- Any sub-projects that;
 - i. Its location is identified to be directly shelled or include rubble at the time of the sub-project identification,
 - ii. Include earthworks activities. sites will be initially screened by the United Nations Mine Actions Services (UNMAS), UNMAS will provide the Explosive Remnant of War (ERW) Assessment Report and the required actions prior proceeding with the environmental and social management tools.

As a second step, MDLF will provide oversight of all E&S screening processes. E&S consultants of MDLF with the LGUs will be responsible for the screening of all its respective activities. and will use the **E&S Screening Form in Annex 1** to identify and assess relevant environmental and social risks specific to the activities, and identify the appropriate mitigation measures. The *Screening Form* lists the various mitigation measures and plans that may be relevant for the specific activities (such as the Environmental and Social Management Plan, the Labor Management Procedures, Chance Find Procedures, etc.)

E&S CONSULTANTS OF MDLF will also identify the documentation, permits, and clearances required under the government's Environmental Regulation.

6.1.2. Subproject Assessment and Analysis – E&S Screening for Component 2

NDC will advertise the "Call for Proposals" for component 2 grants. The call for proposals includes eligibility criteria and subprojects evaluation criteria. NGOs prepare their applications for funding and submit their complete proposal package. Submitted proposals will define subproject objectives, planned interventions, expected outputs, outcomes and budgets. Projects appraisal is undertaken to verify the details of the grants proposals. On the basis of an initial screening of the eligibility criteria, recommendations are made on dropping a proposal or clearing it for full appraisal. Project proposals are dropped at this stage if not meeting all eligibility criteria. Projects appraisal is undertaken to verify the details of the grants proposals. On the basis of an initial screening of the eligibility criteria, recommendations are made on dropping a proposal or clearing it for full appraisal. Project proposals are dropped at this stage if not meeting all eligibility criteria. MoPIC Advisory Committee review and recommend on the preselection carried out by NDC. NDC Board of directors issues an endorsement on

acceptance or rejection of submitted project proposals as per the recommendation of the evaluation team. A copy of NDC Board decision containing all approved and other subprojects will be forwarded to the World Bank. The World Bank, the highest decision-making body, will issue a 'no objection' to the NDC Board decision and the funding of the selected subprojects. NDC will sign with NGOs awarded a grant under this call a Grant Implementation Agreement (GIA). The grant agreement should include commitment to apply the identified E&S mitigation measures, and implement ES monitoring and reporting, reporting significant incidents as per the ESCP.

Each NGO and beneficiary activities will be screened and E&S risks and impacts related to the activity be identified. Then proportionate environmental and social mitigation measures and plans will be prepared and implemented by the NDC and the beneficiary NGOs.

As a first step, all proposed NGO and beneficiary activities should be screened to ensure that they are within the boundaries of the Project's eligible activities, and they are not considered as activities listed on the E&S Exclusion List in the table below.

Table 7: Exclusion List - Component 2

- Support of production of any hazardous good, including alcohol, tobacco, and controlled substances
- Any construction in protected areas or priority areas for biodiversity conservation, as defined in national law
- Activities that have the potential to cause any significant loss or degradation of critical natural habitats, whether directly or indirectly, or which would lead to adverse impacts on natural habitats
- Activities that involve extensive harvest and sale/trade of forest resources (post, timber, bamboo, charcoal, wildlife, etc.) for large-scale commercial purposes
- Activities involving changing forestland into agricultural land or logging activities in primary forest
- Purchase or use of banned/restricted pesticides, insecticides, herbicides, and other dangerous chemicals (banned under national law and World Health Organization (WHO) category 1A and 1B pesticides)
- Activities that involve the use of international waterways
- Any activity affecting physical cultural heritage such as graves, temples, churches, historical relics, archeological sites, or other cultural structures
- Activities that may cause or lead to forced labor or child abuse, child labor exploitation or human trafficking, or subprojects that employ or engage children, over the minimum age of 14 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development
- Any activity on land that has disputed ownership or tenure rights
- Any activity that will cause physical relocation of households or will require the use of eminent domain
- Any activity with significant environmental and social risks and impacts that require an Environmental and Social Impact Assessment (ESIA)
- Trade in wildlife and wildlife products prohibited under the CITES convention,
- Release of genetically altered organisms into the natural environment,
- Manufacturing, distribution and using of pesticides and herbicides,
- Manufacturing, handling and disposal of radioactive products,
- Hazardous waste storage, treatment and disposal,
- Manufacturing of equipment and appliances containing CFCs, halons and other substances regulated under the Montreal Protocol,
- Manufacturing of electrical equipment containing polychlorinated biphenyls (PCBs) in excess of 0.005 % by weight,
- Manufacturing of asbestos containing products,

As a second step, MOPIC and NDC will use the **E&S Screening Form in Annex 2** to identify and assess relevant environmental and social risks specific to the proposed NGO and beneficiary activities, and

identify the appropriate mitigation measures. The Screening Form lists the various mitigation measures and plans that may be relevant for the specific activities (such as the Environmental and Social Codes of Practice, the Environmental and Social Management Plan, the Labor Management Procedures, Chance Find Procedures, etc.)

The MOPIC and NDC will also identify the documentation, permits, and clearances required under the government's Environmental Regulation.

6.1.3. Subproject Assessment and Analysis – E&S Screening for Component 3

As a first step, all proposed activities should be screened to ensure that they are within the boundaries of the Project's eligible activities, and they are not considered as activities listed on the E&S Exclusion List in the table below.

Table 8: Exclusion List - Component 3

<ul style="list-style-type: none"> • Support of production of any hazardous good, including alcohol, tobacco, and controlled substances • Any construction in protected areas or priority areas for biodiversity conservation, as defined in national law • Activities that have the potential to cause any significant loss or degradation of critical natural habitats, whether directly or indirectly, or which would lead to adverse impacts on natural habitats • Activities that involve extensive harvest and sale/trade of forest resources (post, timber, bamboo, charcoal, wildlife, etc.) for large-scale commercial purposes • Activities involving changing forestland into agricultural land or logging activities in primary forest • Purchase or use of banned/restricted pesticides, insecticides, herbicides, and other dangerous chemicals (banned under national law and World Health Organization (WHO) category 1A and 1B pesticides) • Any activity affecting physical cultural heritage such as graves, temples, churches, historical relics, archeological sites, or other cultural structures • Activities that may cause or lead to forced labor or child abuse, child labor exploitation or human trafficking, or subprojects that employ or engage children, over the minimum age of 14 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development • Any activity on land that has disputed ownership or tenure rights • Any activity that will cause physical relocation of households or will require the use of eminent domain • Any activity with significant environmental and social risks and impacts that require an Environmental and Social Impact Assessment (ESIA)

As a second step, MOPIC ESO will use the E&S Screening Form in Annex 3 to identify and assess relevant environmental and social risks specific to the activities, and identify the appropriate mitigation measures. The Screening Form lists the various mitigation measures and plans that may be relevant for the specific activities (such as the Environmental and Social Codes of Practice, the Environmental and Social Management Plan, the Labor Management Procedures, Chance Find Procedures, etc.)

MoPIC ESO will also identify the documentation, permits, and clearances required under the government's Environmental Regulation.

6.2. Subproject Formulation and Planning – E&S Planning

6.2.1. Subproject Formulation and Planning – E&S Planning (For component 1)

Based on the process above and the Screening Form, MDLF will adopt the necessary environmental and social management measures already included in the Annexes of this ESMF (ESMP, ESM, LALP, PMP.) or develop relevant site-specific environmental and social management plans.

E&S consultant of MDLF and LGUs will prepare site specific E&S tools (i.e., ESMPs/ ESMP checklists) and other applicable documents as needed. MDLF will provide approval and compile ESMPs/ESMP checklist and other applicable forms. The contents of the ESMPs/ ESMP checklist will be shared with relevant stakeholders in an accessible manner, and consultations will be held with the affected communities on the environmental and social risks and mitigation measures. If certain subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts can be prepared. Some moderate risk subprojects may also benefit from the preparation of a site-specific environmental and social assessment prior to the preparation of an ESMP.

For activities that assess low or moderate E&S risks rating, ESMPs/ESMP checklists will be prepared, consulted and disclosed as per the sectorial ESMPs prepared under the ESMF. ESMP/ESMP checklists for subprojects/activities that are classified of substantial E&S risk rating will require prior review and clearance by the Bank. Other identified instruments, i.e. LALPs, shall also be reviewed and cleared by the Bank.

LGUs will also complete the documentation, permits and clearances required under the government's Environmental Regulation before any project activities begin.

At this stage, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. E&S consultant of MDLF and LGUs should provide such training to field staff.

E&S consultant of MDLF and LGUs should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. E&S consultant of MDLF and LGUs should provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. MDLF should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

6.2.2. Subproject Formulation and Planning – E&S Planning (for component 2)

Based on the process above and the Screening Form, the NGOs and beneficiary will adopt the necessary environmental and social management measures already included in the Annexes of this ESMF or develop relevant site specific E&S tools (i.e., ESMPs/ ESMP checklists) and other applicable documents as needed.

If site-specific ESMPs/ ESMP checklist are necessary, the NGOs and Beneficiaries will prepare these ESMPs and other applicable documents as needed. MoPIC and NDC will provide approval and compile ESMPs and other applicable forms. The contents of the ESMPs will be shared with relevant stakeholders in an accessible manner, and consultations will be held with the affected communities on the environmental and social risks and mitigation measures. If certain subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts can be prepared. Some moderate risk subprojects may also benefit from the preparation of a site-specific environmental and social assessment prior to the preparation of an ESMP.

All ESMPs/ ESMP checklists should be reviewed by NDC and MoPIC and will also be submitted to the World Bank for prior review and no objection.

NGOs and Beneficiaries will also complete the documentation, permits and clearances required under the government's Environmental Regulation before any project activities begin.

At this stage, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The MoPIC and NDC provide such training to field staff and NGOs.

The NGOs should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them. The NGOs should provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by Beneficiaries, contractors to subcontractors and vendors. The NGOs should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

6.2.3. Subproject Formulation and Planning – E&S Planning (for component 3)

Based on the process above and the Screening Form MoPIC ESO will adopt the necessary environmental and social management measures already included in the Annexes of this ESMF or develop relevant site specific E&S tools (i.e., ESMPs/ ESMP checklists).

If site-specific ESMPs are necessary, MoPIC ESO will prepare these ESMPs or ESMP checklist and other applicable documents as needed. MoPIC ESO will provide approval and compile ESMPs and other applicable forms. The contents of the ESMPs will be shared with relevant stakeholders in an accessible manner, and consultations will be held with the affected communities on the environmental and social risks and mitigation measures. If certain subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts can be prepared. Some moderate risk subprojects may also benefit from the preparation of a site-specific environmental and social assessment prior to the preparation of an ESMP.

The ESMPs and ESMP checklist will also be submitted to the World Bank for prior review and no objection.

MoPIC ESO will also complete the documentation, permits and clearances required under the government's Environmental Regulation before any project activities begin.

At this stage, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The MoPIC ESO should provide such training to field staff, MOA, Mol, and MoLG focal Points.

MoPIC ESO should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. MoPIC ESO should provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. MoPIC ESO should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

6.3. Implementation and Monitoring

6.3.1. Implementation and Monitoring – E&S Implementation (For Component 1)

During implementation, MDLF and ES consultants will conduct regular monitoring visits. The MDLF will be responsible for monitoring the LGUs or contractor compliance with the environmental and social instruments during the project implementation. The LGUs or contractors implementing subproject activities will be responsible for implementing the mitigation measures in the E&S risk management documents, with MDLF oversight.

MDLF working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring.

At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from LGUs will be submitted to the MDLF on quarter basis, where MDLF will be prepare an aggregated report and submitted to the World Bank on a biannual basis.

Throughout the Project implementation stage, the MDLF will continue to provide training and awareness raising to relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is proposed below, in Section 6.8.

MDLF and LGUs will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

Last, if the MDLF and LGUs or contractor becomes aware of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the

public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident. A fatality is automatically classified as a serious incident, as are incidents of forced or child labor, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings.

6.3.2. Implementation and Monitoring – E&S Implementation (component 2)

During implementation, the NDC and NGOs will conduct regular monitoring visits. NGOs and beneficiaries implementing subproject activities will be responsible for implementing the mitigation measures in the E&S risk management documents, with NDC oversight.

MoPIC, NDC and NGOs working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring.

At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from the NGOs will be submitted to the NDC on quarterly basis, where NDC will submit aggregated report to MoPIC on semiannual basis. MoPIC will send a inclusive progress report to the World Bank on a semiannual basis.

Throughout the Project implementation stage, MoPIC, NDC, and NGOs will continue to provide training and awareness raising to relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is proposed below, in Section 8.

MoPIC, NDC and NGOs will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

Last, if the MoPIC, NDC, NGOs and beneficiaries becomes aware of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident. A fatality is automatically classified as a serious incident, as are incidents of forced or child labor, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings.

6.3.3. Implementation and Monitoring – E&S Implementation (For Component 3)

During implementation, MoPIC ESO, MoA Focal Point, MoL focal Point and MoLG focal Point will conduct regular monitoring visits. If there are contractors implementing subproject activities, the contractors will be responsible for implementing the mitigation measures in the E&S risk management documents, MoPIC ESO oversight.

MoPIC ESO, MoA, MoL, and MoLG focal Points working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring.

At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from the MoA, MoL and MoLG will be submitted to the MOPIC ESO on biannual Basis where they will be aggregated and submitted to the World Bank on biannual basis.

Throughout the Project implementation stage, MoPIC ESO, MoA, MoL and MoLG focal Points will continue to provide training and awareness raising to relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is proposed below, in Section 6.8.

MoPIC ESO, MoA, MoL and MoLG focal Points will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

Last, if MoPIC ESO, MoA, MoL and MoLG focal Points becomes aware of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident. A fatality is automatically classified as a serious incident, as are incidents of forced or child labor, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings.

6.4. Review and Evaluation – E&S Completion

6.4.1. Review and Evaluation – E&S Completion (For Component 1)

Upon completion of Project activities, the MDLF will review and evaluate progress and completion of project activities and all required environmental and social mitigation measures. Especially for civil works, MDLF will monitor activities with regard to site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the ESMPs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. The MDLF will prepare the completion report describing the final status of compliance with the E&S risk management measures and submit it to MoPIC to the World Bank.

6.4.2. Review and Evaluation – E&S Completion (For component 2)

Upon completion of Project activities, MOPIC, NDC and NGOs will review and evaluate progress and completion of project activities and all required environmental and social mitigation measures. Especially for civil works, NDC and NGOs will monitor activities with regard to site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before

closing the contracts, in accordance with measures identified in the ESMPs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. The NGOs will prepare the completion report describing the final status of compliance with the E&S risk management measures and submit it to NDC, where they NDC submit aggregated report to MoPIC. MoPIC will prepare inclusive completion report describing the final status of compliance with the E&S risk management measures and submit it to the World Bank.

6.4.3. Review and Evaluation – E&S Completion (For Component 3)

Upon completion of Project activities, MoPIC ESO will review and evaluate progress and completion of project activities and all required environmental and social mitigation measures. Especially for civil works, MoPIC ESO will monitor activities with regard to site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the ESMPs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. MoPIC ESO will prepare inclusive completion report describing the final status of compliance with the E&S risk management measures and submit it to the World Bank.

6.5. Technical Assistance Activities

MoPIC, MDLF, NDC, MoLG, MoL will ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with Terms of Reference acceptable to the Bank, that are consistent with the ESSs. They will also ensure that the outputs of such activities comply with the Terms of Reference.

6.6. Contingency Emergency Response Component

The Contingency Emergency Response Components (CERC) Manual to be prepared for the Project will include a description of the environmental and social risk assessment and management arrangements if the CERC component becomes activated. This may include a CERC ESMF or an Addendum to this ESMF based on the subproject activities that will be funded under the CERC component. If such additional documentation or revision to documentation is needed, MoPIC will prepare, consult, adopt, and disclose these in accordance with the CERC Manual, and implement the measures and actions necessary.

6.7. Implementation Arrangements

The table below summarizes the roles and responsibilities regarding the implementation arrangements for **environmental and social management**.

Table 9: Implementation Arrangements

Responsible Party	Roles and Responsibilities
MoPIC	Provide support, oversight, and quality control to field staff working on environmental and social risk management. - Collect, review, and provide quality assurance and approval to Screening Forms and ESMPs as relevant. Keep documentation of all progress.

	<ul style="list-style-type: none"> - Oversee overall implementation and monitoring of environmental and social mitigation and management activities, compile progress reports from IAs, and report to the World Bank on a biannual basis. - Train , NDC, MOA, MOL and MOLG Focal Points , field staff and contractors who will be responsible for implementing the ESMF. - <p>Implementation of Component 3</p> <p>Ensure project activities do not fall under the Negative List. Fill out Screening Forms for relevant subproject activities.</p> <ul style="list-style-type: none"> - If relevant, complete site-specific ESMPs , ESMP Checklist for subproject activities - Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance of the project to the World Bank on biannual basis. - Ensure that all bidding and contract documents include all relevant E&S management provisions per screening forms, ESMPs ESMP checklist. <p>For implementing Component 2</p> <p>Follow selection process with for NGOs with NDC</p> <p>Ensure project activities do not fall under the Negative List in collaboration with NDC. Fill out Screening Forms for relevant subproject activities.</p>
MDLF	<ul style="list-style-type: none"> - Implementation of Component 1 - Ensure project activities do not fall under the Negative List. Fill out Screening Forms for relevant subproject activities. - If relevant, complete site-specific ESMPs ESMP Checklist for subproject activities - Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to MoPIC on biannual basis. - Provide training to LGUs, local contractors and communities on relevant environmental and social mitigation measures, roles, and responsibilities. - Ensure that all bidding and contract documents include all relevant E&S management provisions per screening forms, ESMPs ESMP checklist .
NDC	<p>Implementation of Component 2</p> <ul style="list-style-type: none"> - Ensure project activities do not fall under the Negative List. Fill out Screening Forms for relevant subproject activities. - If relevant, complete site-specific ESMPs or ESMP checklist for subproject activities - Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to MoPIC on biannual basis. - Provide training to NGOs and beneficiaries on relevant environmental and social mitigation measures, roles, and responsibilities. - Ensure that all agreements, bidding and contract documents include all relevant E&S management provisions per screening forms, ESMPs ESMP checklist.
MoA	Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to MoPIC on biannual basis.
MOL	Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to MoPIC on biannual basis.
MOLG	Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to MoPIC biannual basis.
NGOs	Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to MoPIC on biannual basis.
LGUs	Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to MoPIC on biannual basis.

Local contractors	<ul style="list-style-type: none"> - Comply with the Project's environmental and social mitigation and management measures as specified in ESMFs, ESMP checklist, and contract documents, as well as national and local legislation. - Take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities.
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6.8. Proposed Training and Capacity Building

Table 10: Proposed Training and Capacity Building Approach

Responsible Party	Audience	Topics/Themes that May Be Covered
World Bank	MoPIC staff responsible for overall implementation of ESMF	ESMF and approach: <ul style="list-style-type: none"> • Identification and assessment of E&S risks • Selection and application of relevant E&S risk management measures/instruments • E&S monitoring and reporting • Incident and accident reporting • Application of Labor Management Procedures, including Code of Conduct, incident reporting, SEA/SH, • Application of SEP and the grievance/beneficiary feedback mechanism
MDLF	MDLF staff, technical consultants, and LGUs	<ul style="list-style-type: none"> • Environmental and social screening • ESMP and Labor Management Procedures implementation • Stakeholder engagement • Grievance handling • Health and safety protocols
MoPIC	PMU staff and Project workers in MoPIC, MoLG, MoA, MoL, NDC	<ul style="list-style-type: none"> • ESF fundamental • OHS • GM • stakeholder mapping and engagement • development and implementation of mitigation measures within the ES instruments • addressing the risks of sexual exploitation or abuse and sexual harassment (SEA and SH) (prevention and response) • Code of Conduct for Workers • Gender and Inclusion of vulnerable groups • emergency preparedness and response • community health and safety and reporting
MDLF	LGUs	<ul style="list-style-type: none"> • ESF fundamentals • Workers health and safety • Awareness on UXO risk management • Workers' Grievance Mechanism
NDC	NGOs and CBOs	<ul style="list-style-type: none"> • ESF fundamentals • OHS and environmentally safe practices • Workers' Grievance Mechanism • Prevention of and response to potential SEA/SH incidents

6.9. Estimated Budget

The following table lists estimated cost items for the implementation for the ESMF, which have been included in the overall project budget:

Table 11: ESMF Implementation Budget

Activity/Cost Item	Potential Cost (USD)
E&S Training and awareness under component 1 (including OHS, GBV (SEA/SH), CoC, labor rights and working conditions, GM, etc.)	15,000
E&S Training and awareness under component 2 (including OHS, GBV (SEA/SH), CoC, labor rights and working conditions, GM, etc.)	7,000
E&S Training and awareness under component 3 (including OHS, GBV (SEA/SH), CoC, labor rights and working conditions, GM, etc.)	3,000
Printing of awareness raising materials / grievance redress materials	3,000
Software for data collection / supervision / monitoring / grievance redress	
Preparation of site-specific ESMPs and other site-specific plans	30,000
Environmental and social staff (Social Specialist and Environment and health specialist – for 5 years)	360,000
Travel and accommodation budget for environmental and social staff site visits	5,000
External monitoring or supervision consultant	20,000
TOTAL	443,000

7. Stakeholder Engagement, Disclosure, and Consultations

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found here: [provide disclosure link for the SEP].

This ESMF, as well as the SEP and the Environmental and Social Commitment Plan (ESCP) that have been prepared for this project, have been disclosed in draft for stakeholder consultations on the following website [provide website address] on [date]. Key feedback, if any, on the disclosed ESMF is listed here [summary of feedback].

Annex 1 - Screening Form for component 1

The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the **Exclusion List** in Table 6 of the ESMF for component 1; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

Subproject Title	
Project Component	
Subproject Location (Insert Maps In Annexes as needed)	
Regional Unit / LGU/ Municipality in Charge	
Estimated Cost	
Start/Completion Date	
Brief Description of Subproject	

2. Environmental and Social Screening Questionnaires

Questions		Answer		Next Steps
		Yes	No	
ESS1				
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?				If "Yes": Exclude from project.
Are there potential risks of finding of unexploded ordnances (UXO) in areas affected by military activities in Northern West Bank				If "Yes": Apply requirements in Project UXO Risk Assessment
2. Does the subproject involve <u>new construction or significant expansion</u> upgrading or rehabilitation ?				If "Yes": 1. Prepare a site-specific E&S Assessment and/or ESMP/ ESMP Checklist for the proposed subproject, based on the templates in Annex 5 & 6. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
3. Does the subproject involve <u>renovation or rehabilitation</u> of any small-scale infrastructure?				If "Yes": 1. Prepare a site-specific E&S Assessment and/or ESMP/ ESMP Checklist for the proposed subproject, based on the templates in Annex 5 & 6. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
4. Are there any anticipated potential impacts and risks to the physical environment, including water resources, atmospheric emissions, noise, solid waste, or ecological degradation?				If "Yes": 1. Prepare a site-specific E&S Assessment and/or ESMP/ ESMP Checklist for the

			proposed subproject, based on the templates in Annex 5 & 6. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
5. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. ¹			If "Yes": Apply relevant measures described in the ESMF and SEP.
6. Does the subproject management have the institutional environmental and social capacity to manage and implement the E&S risks and mitigation measures?			If "No": Implement the ESMF Measures as described in section 6.8 Proposed training and capacity building.
ESS2			
1. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If "Yes": Exclude from project.
2. Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?			If "Yes": Apply relevant measures described in the ESMF and the Simplified Labor Management Procedures in Annex 7 .
3. Will the workers be exposed to OHS and workplace hazards that needs to be managed in accordance with local regulations and EHSs? Do workers need PPE relative to the potential risks and hazards associated with their work?			If "Yes": 1. Apply relevant measures described in the ESMF . 2. Apply national OHS legislation and EHSs on OHS as described in the Simplified Labor Management Procedures in Annex 7 .
4. Will the subproject pose traffic and road safety hazards on Workers?			If "Yes": 1. Prepare a site-specific ESMP / ESMP Checklist for the proposed subproject, based on the template in Annexes 5 & 6. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
5. Do the subproject and financed activities carry GBV (SEA / SH) risks to its workers? Are the financed activities expected to be sensitive to such risks?			If "Yes": 1. Ensure that the workers' GM is available to all workers and contains accessible and effective GBV (SEA/ SH) referral pathways in line with the SEP.
ESS3			
1. Is the subproject expected to generate dust/ noise/ vibrations/ nuisance?			If "Yes": Apply relevant measures described in the ESMF
2. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?			If "Yes": 1. Prepare a site-specific ESMP/ ESMP checklist for the proposed subproject, based on the template in annexes 5&6. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
3. Is the subproject expected to be associated with a generation of e-waste?			If "Yes": Apply relevant measures described in the ESMF

¹ "Disadvantaged or vulnerable" refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

4. Is the subproject expected to be associated with generation of solid waste?			<p>If "Yes":</p> <ol style="list-style-type: none"> 1- Low to Moderate solid waste generation: prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 5. Substantial waste generation: prepare Waste management plan 2- Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
5. Is the subproject expected to be associated with generation of construction and demolition waste?			<p>If "Yes":</p> <ol style="list-style-type: none"> 1- Low to Moderate generation: prepare a site-specific ESMP/ ESMP Checklist for the proposed subproject, based on the template in Annexes 5&6 and adhere to the Construction and Demolition Waste Management System No.16 of 2023. 2- Substantial waste generation: prepare Construction and Demolition Waste management plan 3- Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
6. Is the subproject expected to be associated with generation of hazardous waste			<p>If "Yes":</p> <ol style="list-style-type: none"> 1- Low to Moderate waste generation: prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 5. 2- Substantial waste generation: prepare Hazardous Waste management plan 3- Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements
7. Are works likely to cause significant negative impacts to air and / or water quality?			<p>If "Yes":</p> <ol style="list-style-type: none"> 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
8. Is there any potential to have impact on soil or water bodies due to agro-chemicals (e.g., pesticides) used in farmlands due to the consequences of the subproject activities (e.g., development of irrigation system, agriculture related activities, seed and fertilizer assistance, procurement of pesticides)?			<p>If "Yes": Apply Fertilizer and Pest Management Plan in Annex 9.</p>
ESS4			
1. Is there a risk of increased community exposure to communicable disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			<p>If "Yes": Apply the Simplified Labor Management Procedures in Annex 7, and relevant measures in SEP.</p>
2. Is there a risk of increasing the probability / creating GBV potential impacts due to the execution of financed activities?			<p>If "Yes":</p> <ol style="list-style-type: none"> 1. Ensure that the GM is available, disclosed, and contains accessible and effective GBV (SEA/ SH) referral pathways in line with the SEP.

			2. Include GBV referral pathways in awareness and stakeholder engagement activities.
3. Will the financed activities present hazards to community members on the sub-project site?			If "Yes": Implement ESMF Measures and ESCOPs in Annex 4
4. Would any public facilities, such as schools, health clinic, mosques, etc. be negatively affected by construction?			If "Yes": Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP).
5. Will the subproject require the government to retain workers to provide security to safeguard the subproject?			If "Yes": Prepare a site-specific ESMP for the proposed subproject, including an assessment of potential risks and mitigation measures of using security personnel.
6. Will the subproject pose traffic and road safety hazards?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 4. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
ESS5			
1. Will the Project require land acquisition and resettlement?			If "Yes": 1. Prepare a site specific LALP 2. Implement the SEP 3. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements
2. Will the project cause impact on livelihood that cause loss of income of the affected persons (temporarily or permanently loss of crops, fruits, trees ...etc.)			If "Yes": 1. Prepare a site specific LALP 2. Implement the SEP 3. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements
ESS6			
1. Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats ² whether directly or indirectly, or which would lead to adverse impacts on natural habitats ³ ?			If "Yes": Exclude from project.
2. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?			If "Yes": Exclude from project.
3. Is there a risk that the sub-project will result in (i) increased water consumption (ii) contamination of soil or water?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 4.
ESS8			

² Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d)."

³ Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

1. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?			If "Yes": Apply Chance Find Procedures in Annex 8
2. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?			If "Yes": Apply Chance Find Procedures in Annex 8.
ESS 10			
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?			Implement the project SEP measures
Are women and marginalized vulnerable groups likely to participate in decision-making processes regarding the activity?			Implement the project SEP measures
Is there a risk that exclusion of beneficiaries will lead to grievances?			1- Implement the project SEP measures 2- Ensure that the GM is available, disclosed, and contains accessible and effective GBV (SEA/ SH) referral pathways in line with the SEP.

3. Conclusion

Based on the result from the screening above, please list the E&S risk management instruments to be prepared / adopt and implemented:

- a)
- b)

Name and title of person who conducted screening:

Date of screening:

Annex 2 - Screening Form for component 2

The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the **Exclusion List** in Table 7 of the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

Subproject Title	
Project Component	
Subproject Location (Insert Maps In Annexes as needed)	
Supervising NGO	
Estimated Cost	
Start/Completion Date	
Brief Description of Subproject	

2. Environmental and Social Screening Questionnaires

Questions	Answer		Next Steps
	Yes	No	
ESS1			
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?			If "Yes": Exclude from project.
2. Does the subproject involve <u>renovation or rehabilitation</u> of any small-scale infrastructure?			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6 2. Include E&S risk management measures in bidding documents or beneficiary agreement
3. Are there any anticipated potential impacts and risks to the physical environment, including water resources, atmospheric emissions, noise, solid waste, or ecological degradation?			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 5. 2. Include E&S risk management measures in bidding documents or beneficiary agreement
4. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. ¹			If "Yes": Apply relevant measures described in the ESMF and SEP.
ESS2			
1. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If "Yes": Exclude from project.
2. Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?			If "Yes": Apply relevant measures described in the ESMF and Simplified Labor Management Procedures in Annex 7.

3. Will the workers be exposed to OHS and workplace hazards that needs to be managed in accordance with local regulations and EHSGs? Do workers need PPE relative to the potential risks and hazards associated with their work?			If "Yes": 1. Apply relevant measures described in the ESMF . 2. Apply national OHS legislation and EHSGs on OHS as described in the Simplified Labor Management Procedures in Annex 7.
4. Is there a risk that women and vulnerable and marginalized groups including PWD may be underpaid?			If "Yes": Apply relevant measures described in the ESMF and the Simplified Labor Management Procedures in Annex 7.
5. Do the subproject and financed activities carry GBV (SEA / SH) risks to its workers? Are the financed activities expected to be sensitive to such risks?			If "Yes": 1. Ensure that the workers' GM is available to all workers and contains accessible and effective GBV (SEA/ SH) referral pathways in line with the SEP.
ESS3			
1. Is the subproject expected to generate dust/noise/vibrations/nuisance?			If "Yes": Apply relevant measures described in the ESMF
2. Is the subproject expected to be associated with a generation of e-waste?			If "Yes": Apply relevant measures described in the ESMF
3. Is the subproject expected to be associated with generation of waste			1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6. 2. Include E&S risk management measures in bidding documents or grant agreements
4. Is the subproject expected to be associated with generation of hazardous waste			1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6. 2. Include E&S risk management measures in bidding documents or grant agreements
5. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6. 2. Include E&S risk management measures in bidding documents or beneficiary
6. Are works likely to cause significant negative impacts to air and / or water quality?			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6. 2. Include E&S risk management measures in bidding documents or grant agreements
7. Does subprojects include use of chemicals			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6. 2. Include E&S risk management measures in bidding documents or beneficiary
8. Is there any potential to have impact on soil or water bodies due to agro-chemicals (e.g., pesticides) used in farmlands due to the consequences of the subproject activities (e.g., development of irrigation system, agriculture related activities, seed and fertilizer assistance, procurement of pesticides)?			If "Yes": Apply Fertilizer and Pest Management Plan Annex 9.
ESS4			

1. Is there a risk of increased community exposure to communicable disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			If "Yes": Apply the Simplified Labor Management Procedures in Annex 7 , and relevant measures in SEP.
2. Is there a risk of increasing the probability / creating GBV potential impacts due to the execution of financed activities?			If "Yes": 3. Ensure that the GM is available, disclosed, and contains accessible and effective GBV (SEA/ SH) referral pathways in line with the SEP. 4. Include GBV referral pathways in awareness and stakeholder engagement activities.
3. Will the financed activities present hazards to community members on the sub-project site?			If "Yes": Implement ESMF Measures and ESCOPs in Annex 4.
4. Would any public facilities, such as schools, health clinic, mosques, etc. during the different subproject phases?			If "Yes": Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP).
5. Will the subproject pose traffic and road safety hazards?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 5. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
ESS5			
1. Will the subproject activities during any of its phases will result in restrictions or hindering the movement of adjacent communities to their lands or will it result in restrictions on land use?			If "Yes": 4. Prepare a site specific LALP 5. Implement the SEP 6. Include E&S risk management measures in bidding documents or grant agreements
2. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?			If "Yes": Exclude from project.
3. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?			If "Yes": Exclude from project.
ESS6			
1. Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats ¹ whether directly or indirectly, or which would lead to adverse impacts on natural habitats ¹ ?			If "Yes": Exclude from project.
2. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?			If "Yes": Exclude from project.
3. Will the project involve the conversion or degradation of non-critical natural habitats?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 5. 2. Include E&S risk management measures in bidding documents.
4. Is there a risk that the sub-project will result in (i) increased water consumption (ii) contamination of soil or water?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 5.

ESS8			
32. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?			If "Yes": Apply Chance Find Procedures in Annex 8.
33. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?			If "Yes": Apply Chance Find Procedures in Annex 8.
ESS 10			
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?			Implement the project SEP measures
Are women and marginalized vulnerable groups likely to participate in decision-making processes regarding the activity?			Implement the project SEP measures
Is there a risk that exclusion of beneficiaries will lead to grievances?			3- Implement the project SEP measures Ensure that the GM is available, disclosed, and contains accessible and effective GBV (SEA/ SH) referral pathways in line with the SEP.

3. Conclusion

Based on the result from the screening above, please list the E&S risk management instruments to be prepared / adopt and implemented:

- a)
- b)

Name and title of person who conducted screening:

Date of screening:

Annex 3 - Screening Form for component 3

The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the **Exclusion List** in Table 8 of the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

Subproject Title	
Project Component	
Subproject Location (Insert Maps In Annexes as needed)	
Beneficiary (MoPIC / MoL / MoA / MoLG)	
Estimated Cost	
Start/Completion Date	
Brief Description of Subproject	

2. Environmental and Social Screening Questionnaires

Questions	Answer		Next Steps
	Yes	No	
ESS1			
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?			If "Yes": Exclude from project.
2. Does the subproject involve <u>renovation or rehabilitation</u> of any small-scale infrastructure?			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6 2. Include E&S risk management measures in bidding documents or beneficiary agreement
3. Does the subproject involve <u>new construction or significant expansion</u> upgrading or rehabilitation ?			If "Yes": 1. Prepare a site-specific E&S Assessment and/or ESMP/ ESMP Checklist for the proposed subproject, based on the templates in Annex 5&6. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
4. Are there any anticipated potential impacts and risks to the physical environment, including water resources, atmospheric emissions, noise, solid waste, or ecological degradation?			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 5. 2. Include E&S risk management measures in bidding documents or beneficiary agreement
5. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. ¹			If "Yes": Apply relevant measures described in the ESMF and SEP.
6. Does the subproject management have the institutional environmental and social capacity to manage and implement the E&S risks and mitigation measures?			If "No": Implement the ESMF Measures as described in section 6.8 Proposed training and capacity building.
ESS2			
1. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If "Yes": Exclude from project.

2. Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?			If "Yes": Apply relevant measures described in the ESMF and the Simplified Labor Management Procedures in Annex 7 .
3. Will the workers be exposed to OHS and workplace hazards that needs to be managed in accordance with local regulations and EHSGs? Do workers need PPE relative to the potential risks and hazards associated with their work?			If "Yes": 1. Apply relevant measures described in the ESMF . 2. Apply national OHS legislation and EHSGs on OHS as described in the Simplified Labor Management Procedures in Annex 7 .
5. Do the subproject and financed activities carry GBV (SEA / SH) risks to its workers? Are the financed activities expected to be sensitive to such risks?			If "Yes": 1. Ensure that the workers' GM is available to all workers and contains accessible and effective GBV (SEA/ SH) referral pathways in line with the SEP.
6. Will the subproject pose traffic and road safety hazards on Workers?			If "Yes": 1. Prepare a site-specific ESMP / ESMP Checklist for the proposed subproject, based on the template in Annexes 5&6. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
ESS3			
1. Is the subproject expected to generate dust/noise/vibrations/nuisance?			If "Yes": Apply relevant measures described in the ESMF
2. Is the subproject expected to be associated with a generation of e-waste?			If "Yes": Apply relevant measures described in the ESMF
3. Is the subproject expected to be associated with generation of waste			1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6. 2. Include E&S risk management measures in bidding documents or grant agreements
4. Is the subproject expected to be associated with generation of hazardous waste			1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6. 2. Include E&S risk management measures in bidding documents or grant agreements
5. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex (-). 2. Include E&S risk management measures in bidding documents or beneficiary
6. Are works likely to cause significant negative impacts to air and / or water quality?			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6. 2. Include E&S risk management measures in bidding documents or grant agreements
7. Does subprojects include use of chemicals			If "Yes": 1. Prepare a site-specific ESMP checklist for the proposed subproject, based on the template in Annex 6. 2. Include E&S risk management measures in bidding documents or beneficiary

8. Is there any potential to have impact on soil or water bodies due to agro-chemicals (e.g., pesticides) used in farmlands due to the consequences of the subproject activities (e.g., development of irrigation system, agriculture related activities, seed and fertilizer assistance, procurement of pesticides)?			If "Yes": Apply Fertilizer and Pest Management Plan Annex 9.
ESS4			
1. Is there a risk of increased community exposure to communicable disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			If "Yes": Apply the Simplified Labor Management Procedures in Annex 7 , and relevant measures in SEP.
2. Is there a risk of increasing the probability / creating GBV potential impacts due to the execution of financed activities?			If "Yes": 5. Ensure that the GM is available, disclosed, and contains accessible and effective GBV (SEA/ SH) referral pathways in line with the SEP. 6. Include GBV referral pathways in awareness and stakeholder engagement activities.
3. Will the financed activities present hazards to community members on the sub-project site?			If "Yes": Implement ESMF Measures and ESCOPs in Annex 4.
4. Would any public facilities, such as schools, health clinic, mosques, etc. during the different subproject phases?			If "Yes": Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP).
5. Will the subproject pose traffic and road safety hazards?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 5. 2. Include E&S risk management measures in bidding documents or LGUs and Municipalities agreements.
ESS5			
1. Will the subproject activities during any of its phases will result in restrictions or hindering the movement of adjacent communities to their lands or will it result in restrictions on land use?			If "Yes": 7. Prepare a site specific LALP 8. Implement the SEP 9. Include E&S risk management measures in bidding documents or grant agreements
2. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?			If "Yes": Exclude from project.
3. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?			If "Yes": Exclude from project.
ESS6			
1. Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats ¹ whether directly or indirectly, or which would lead to adverse impacts on natural habitats ¹ ?			If "Yes": Exclude from project.
2. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?			If "Yes": Exclude from project.
3. Will the project involve the conversion or degradation of non-critical natural habitats?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 5.

			2. Include E&S risk management measures in bidding documents.
4. Is there a risk that the sub-project will result in (i) increased water consumption (ii) contamination of soil or water?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 5.
ESS8			
32. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?			If "Yes": Apply Chance Find Procedures in Annex 8.
33. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?			If "Yes": Apply Chance Find Procedures in Annex 8.
ESS 10			
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?			Implement the project SEP measures
Are women and marginalized vulnerable groups likely to participate in decision-making processes regarding the activity?			Implement the project SEP measures
Is there a risk that exclusion of beneficiaries will lead to grievances?			4- Implement the project SEP measures Ensure that the GM is available, disclosed, and contains accessible and effective GBV (SEA/ SH) referral pathways in line with the SEP.

3. Conclusion

Based on the result from the screening above, please list the E&S risk management instruments to be prepared / adopt and implemented:

- c)
- d)

Name and title of person who conducted screening:

Date of screening:

Annex 4. Environmental and Social Codes of Practice (ESCOP)

To manage and mitigate potential negative environmental impacts, the project applies Environmental Codes of Practice (ESCOPs); outlined in this document. The ESCOPs contain specific, detailed and tangible measures that would mitigate the potential impacts of each type of eligible subproject activity under the project. They are marked as relevant for the planning phase, the implementation phase, or the post-implementation phase of activities. They are intended to be simple risk mitigation and management measures, readily usable to the Borrower and contractors.

The ESCOPs in this section are divided into:

- a. ESCOPs for infrastructure subprojects (general guidelines and technical guidelines)
- b. ESCOPs for livelihood support subprojects

a. ESCOPs for Infrastructure Subprojects

General ESCOP for Infrastructure Subprojects

Issue	Environmental Prevention/Mitigation Measures	Responsible Party
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1. Noise during construction	<ul style="list-style-type: none"> a) Plan activities in consultation with communities so that noisiest activities are undertaken during periods that will result in least disturbance. (Planning phase) b) Use when needed and feasible noise-control methods such as fences, barriers or deflectors (such as muffling devices for combustion engines or planting of fast-growing trees). (Implementation phase) c) Minimize project transportation through community areas. Maintain a buffer zone (such as open spaces, row of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters. (Implementation phase) 	LGUs/ Municipalities
2. Soil erosion	<ul style="list-style-type: none"> a) Schedule construction during dry season. (Planning phase) b) Contour and minimize length and steepness of slopes. (Implementation phase) c) Use mulch, grasses or compacted soil to stabilize exposed areas. (Implementation phase) d) Cover with topsoil and re-vegetate (plant grass, fast-growing plants/bushes/trees) construction areas quickly once work is completed. (Post-Implementation phase) e) Design channels and ditches for post-construction flows and line steep channels/slopes (e.g., with palm fronds, jute mats, etc.). (Post-Implementation phase) 	LGUs/ Municipalities
3. Air quality	<ul style="list-style-type: none"> a) Minimize dust from exposed work sites by applying water on the ground regularly during dry season. (Implementation phase) b) Avoid burn site clearance debris (trees, undergrowth) or construction waste materials. (Implementation phase) c) Keep stockpile of aggregate materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals. . (Implementation phase) d) Reduce the operation hours of generators /machines /equipment /vehicles. (Implementation phase) e) Control vehicle speed when driving through community areas is unavoidable so that dust dispersion from vehicle transport is minimized. (Implementation phase) 	LGUs/ Municipalities
4. Water quality and availability	<ul style="list-style-type: none"> a) Activities should not affect the availability of water for drinking and hygienic purposes. (Implementation phase) b) No soiled materials, solid wastes, toxic or hazardous materials should be stored in, poured into or thrown into water bodies for dilution or disposal. (Implementation phase) c) Avoid the use of waste water pools particularly without impermeable liners. d) Provision of toilets with temporary septic tank. (Implementation phase) e) The flow of natural waters should not be obstructed or diverted to another direction, which may lead to drying up of river beds or flooding of settlements. (Implementation phase) f) Separate concrete works in waterways and keep concrete mixing separate from drainage leading to waterways. (Implementation phase) 	LGUs/ Municipalities
5. Solid and hazardous waste	<ul style="list-style-type: none"> a) Segregate construction waste as recyclable, hazardous and non-hazardous waste. (Implementation phase) b) Collect, store and transport construction waste to appropriately designated/ controlled dump sites. (Implementation phase) 	LGUs/ Municipalities

	<p>c) Use secured area for refuelling and transfer of other toxic fluids distant from settlement area (and at least 50 metres from drainage structures and 100 metres from important water bodies); ideally on a hard/non-porous surface. (Implementation phase)</p> <p>d) Train workers on correct transfer and handling of fuels and other substances and require the use of gloves, boots, aprons, eyewear and other protective equipment for protection in handling highly hazardous materials. (Implementation phase)</p> <p>e) Collect and properly dispose of small amount of maintenance materials such as oily rags, oil filters, used oil, etc. Never dispose spent oils on the ground and in water courses as it can contaminate soil and groundwater (including drinking water aquifer). (Implementation phase)</p> <p>f) After each construction site is decommissioned, all debris and waste shall be cleared. (Post-Implementation phase)</p>	
6. Asbestos	<p>a) If asbestos or asbestos containing materials (ACM) are found at a construction site, they should be clearly marked as hazardous waste. (Implementation phase)</p> <p>b) The asbestos should be appropriately contained and sealed to minimize exposure. (Implementation phase)</p> <p>c) Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust. (Implementation phase)</p> <p>d) If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labeled. (Implementation phase)</p> <p>e) Removed ACM must not be reused. (Implementation and post-implementation phase)</p>	LGUs/ Municipalities
7. Health and Safety	<p>a) When planning activities of each subproject, discuss steps to avoid people getting hurt. (Planning phase)</p> <p>It is useful to consider:</p> <ul style="list-style-type: none"> • Construction place: Are there any hazards that could be removed or should warn people about? • The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their works safely? • The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do people need any particular skills or knowledge to enable them to use it safely? • Electricity Safety: Do any electricity good practices such as use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measure, aware on identifying burning smell from wires, etc. apply at site? Is the worksite stocked with voltage detectors, clamp meters and receptacle testers? <p>b) Mandate the use of personal protective equipment for workers as necessary (gloves, dust masks, hard hats, boots, goggles). (Implementation phase)</p> <p>c) Follow the below measures for construction involve work at height (e.g. 2 meters above ground (Implementation phase):</p> <ul style="list-style-type: none"> • Do as much work as possible from the ground. • Do not allow people with the following personal risks to perform work at height tasks: eyesight/balance problem; certain chronic diseases – such as 	LGUs/ Municipalities

	<p>osteoporosis, diabetes, arthritis or Parkinson's disease; certain medications – sleeping pills, tranquilisers, blood pressure medication or antidepressants; recent history of falls – having had a fall within the last 12 months, etc.</p> <ul style="list-style-type: none"> • Only allow people with sufficient skills, knowledge and experience to perform the task. • Check that the place (eg a roof) where work at height is to be undertaken is safe. • Take precautions when working on or near fragile surfaces. • Clean up oil, grease, paint, and dirt immediately to prevent slipping; and • Provide fall protection measures e.g. safety harness, simple scaffolding/guard rail for works over 4 meters from ground. <p>d) Keep worksite clean and free of debris on daily basis. (Implementation phase)</p> <p>e) Provision of first aid kit with bandages, antibiotic cream, etc. or health care facilities and enough drinking water. (Implementation phase)</p> <p>f) Keep corrosive fluids and other toxic materials in properly sealed containers for collection and disposal in properly secured areas. (Implementation phase)</p> <p>g) Ensure adequate toilet facilities for workers from outside of the community. (Implementation phase)</p> <p>h) Rope off construction area and secure materials stockpiles/ storage areas from the public and display warning signs including at unsafe locations. Do not allow children to play in construction areas. (Implementation phase)</p> <p>i) Ensure structural openings are covered/protected adequately. (Implementation phase)</p> <p>j) Secure loose or light material that is stored on roofs or open floors. (Implementation phase)</p> <p>k) Keep hoses, power cords, welding leads, etc. from laying in heavily traveled walkways or areas. (Implementation phase)</p> <p>l) If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed. (Implementation phase)</p> <p>m) Control driving speed of vehicles particularly when passing through community or nearby school, health center or other sensitive areas. (Implementation phase)</p> <p>n) During heavy rains or emergencies of any kind, suspend all work. (Implementation phase)</p> <p>o) Fill in all earth borrow-pits once construction is completed to avoid standing water, water-borne diseases and possible drowning. (Post-Implementation phase)</p>	
8. Other	<p>a) No cutting of trees or destruction of vegetation other than on construction site. [Implementing agency] will procure locally sourced materials consistent with traditional construction practices in the communities. (Planning phase)</p> <p>b) No hunting, fishing, capture of wildlife or collection of plants. (Implementation phase)</p>	LGUs/ Municipalities

	c) No use of unapproved toxic materials including lead-based paints, un-bonded asbestos, etc. (Implementation phase)	
	d) No disturbance of cultural or historic sites. (Planning and implementation phases)	

Specific ESCOPs for Infrastructure Subprojects

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
Buildings		
In general	a) Provide adequate drainage in the building's immediate surroundings to avoid standing water, insect related diseases (malaria, etc.) and unsanitary conditions. (Implementation phase) b) Include sanitary facilities such as toilets and basins for hand-washing. (Implementation phase) c) Restrict use of asbestos cement tiles as roofing. (Implementation phase) d) Tiled floors are preferred for easier cleaning and more hygienic. (Planning and implementation phases)	LGUs/ Municipalities
Shelters, community centers, schools, kindergartens.	a) Design of schools, community centres, markets should follow relevant requirements on life and fire safety required by National Building Codes and relevant guidelines from the concerned Ministries. (Planning phase) b) Schools: Maximise natural light and ventilation systems to minimise needs for artificial light and air conditioning; use large windows for bright and well-ventilated rooms. (Planning phase)	LGUs/ Municipalities
Roads, Bridges and Jetties		
Roads connecting villages, between villages and townships.	General Considerations: a) Control placement of all construction waste (including earth cuts) to approved disposal sites. If we do have to dispose spent oil unexpectedly, we should use safe disposal method capable by rural community. For example- burning spent oil as fuel. (Implementation phase) b) Erosion control measures should be applied before the rainy season begins, preferably immediately following construction. Maintain, and reapply the measures until vegetation is successfully established. (Implementation and post-implementation phases) c) Sediment control structures should be applied where needed to slow or redirect runoff and trap sediment until vegetation is established. (Implementation and post-implementation phases) d) Avoid road construction in unstable soils, steep slopes and nearby river banks. Additional measures (see the section below) need to be applied should there be no alternatives for road alignments. (Planning phase)	LGUs/ Municipalities
	Protect slopes from erosion and landslides by the following measures (Implementation phase): a) Indigenous Species, fast-growing grass on slopes prone to erosion. These grasses help stabilise the slope and protect soil from erosion by rain and runoff. Locally available species possessing the properties of good growth, dense ground cover and deep root shall be used for stabilisation. b) Provide interceptor ditch, particularly effective in the areas of high intensity rainfall and where slopes are exposed. This type of ditch intercepts and	LGUs/ Municipalities

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
	<p>carries surface run-off away from erodible areas and slopes before reaching the steeper slopes, thus reducing the potential surface erosion.</p> <p>c) For steep slopes, a stepped embankment (terracing) is needed for greater stability.</p> <p>d) Place a retaining wall at the lower part of the unstable slope. The wall needs to have weeping holes for drainage of the road sub-base, thus reducing pressure on the wall.</p> <p>e) Rocks (riprap) can be used in addition to protect the slope.</p> <p>f) Prevent uncontrolled water discharge from the road surface by sufficiently large drainage ditches and to drain water away from the down slope.</p>	
	<p>Water Quality and Fauna (Implementation phase):</p> <p>a) Restrict duration and timing of in-stream activities to lower flow periods (dry season) and avoid periods critical to biological cycles of valued flora and fauna (e.g., spawning)</p> <p>b) Water flow diversion should be avoided; if it is impossible to avoid, impacts should be assessed and mitigation proposed.</p> <p>c) Establish clear separation of concrete mixing and works from drainage areas and waterways</p>	LGUs/ Municipalities
Water Supply		
Shallow Groundwater Wells	<p>a) Site wells so that appropriate zone of sanitary protection can be established. (Planning phase)</p> <p>b) Equip with slab around the well for easy drainage, a crossbeam and a pulley to support the use of only one rope and bucket for collecting water. One rope and bucket is more hygienic for the well and water. (Implementation phase)</p> <p>c) Install steel steps/rungs (inside wall of a deep well) for maintenance and in case of emergency. (Implementation phase)</p> <p>d) A groundwater well usually has a wide open water area. It is necessary to provide a cover/roof/wire mesh on top to protect this area from falling leaves or debris. (Implementation phase)</p> <p>e) Wells should always be located upstream of the septic tank soak-away. Build the soak-away as far away as possible from the well (minimum 15 m/50 feet) as it can influence the quality of the drinking water when it is too close. (Planning and implementation phases)</p> <p>f) Before using a new water source, test water quality and when intended for potable purposes ensure water meets the national drinking water standard. Water quality should also be monitored in the case of all well rehabilitation. (Post implementation phase)</p>	LGUs/ Municipalities
Spring	<p>a) Every spring capture should be equipped with a filter and a sand trap. Add a wall between the inflow and the outlet pipe to create chamber for settling out sand; build the wall with a notch (lowered section) for controlled flow. Sand must be cleaned out periodically (operation and maintenance). (Implementation and post-implementation phases)</p> <p>b) Collection basin for spring capture needs to have a perforated PVC pipe (holes diameter 2mm) to be used as a screen for the water intake. Alternatively, a short pipe with wire mesh (screen) around the open end should be provided. (Implementation phase)</p> <p>c) Collection basin needs to have a fence to protect the spring from public access and risk of contamination; and a roof/cover over the spring to prevent leaves or other debris from entering the basin. (Implementation phase)</p>	LGUs/ Municipalities

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
Rainwater harvesting	<p>a) Rainwater storage reservoir should be intact, connected to roof gutter system, with all faucets and piping intact. (Implementation phase)</p> <p>b) If distribution pipes are attached into the storage reservoir, install the distribution pipes 10cm above the storage/tank bottom for better use of the storage capacity. (Implementation phase)</p> <p>c) Cover must be fitted tightly onto the top of the storage reservoir to avoid overheating and growth of algae (from direct sunlight), and to prevent insects, solid debris and leaves from entering the storage tank. (Implementation phase)</p> <p>d) A ventilation pipe with fly screen should be placed in the cover to help aerate the tank/reservoir which is necessary for good water quality. (Implementation phase)</p> <p>e) Roof gutters need to be cleared regularly, as bird and animal feces and leaf litter on roofs or guttering can pose a health risk if they are washed into the reservoir tank. (Post-implementation phase)</p> <p>f) Reservoir tanks need an overflow so that in time of really heavy rain, the excess water can drain away. The overflow should be designed to prevent backflow and stop vermin/rodents/insects entering the system. A good design will allow the main storage tank to overflow at least twice a year to remove built up of floating sediment on the top of the stored water and maintain good water quality. (Planning and implementation phases)</p>	LGUs/ Municipalities
Installation / Rehabilitation of pipelines	<p>Preventing contamination at water sources:</p> <p>a) Build a structure with roof over the water source to prevent leaves or other debris from entering into the basin. (Implementation phase)</p> <p>b) A fence is needed to protect the water sources (springs particularly) from public access and risk of contamination. (Implementation phase)</p> <p>c) The sand/gravel filter traps sediment before the spring flow enters the collection chamber and has to be changed during periodical maintenance. (Implementation and post-implementation phases)</p> <p>Pipe Laying:</p> <p>a) PVC water transmission and distribution piping need to be buried underground (coverage 50cm minimum) to prevent pipe against external damage (e.g. passing vehicles, solar UV radiation, etc.). Exposing PVC pipe to UV radiation causes the plasticiser in the PVC pipe to evaporate causing loss of integrity and brittleness. (Implementation phase)</p> <p>b) Pipe shall be laid in a straight line, over a constantly falling slope. (Implementation phase)</p> <p>c) When conditions do not allow piping to be buried (i.e. pipe is used above ground), then metal pipe must be used, and supported/braced as excessive movement may lead to leaks and breaks. (Implementation phase)</p> <p>d) Outlet pipes and fittings from water storage/basin shall not be PVC pipe due to exposure to solar UV/sunlight. Metal piping and fittings are preferred. (Implementation phase)</p> <p>e) When the distribution pipes are laying via forest area, the following considerations are needed (Planning and implementation phases):</p> <ul style="list-style-type: none"> The route must be considered with minimum effects of changing the existing situations of the forest as well as the least habitats area of the animals Setbacks distances from important natural features (e.g. mineral licks, wildlife features such as nest, leks, dens, staging areas, lambing areas, calving areas) to conserve wildlife values should be kept, if necessary. 	LGUs/ Municipalities
Electrification		
Solar power supply	<p>a) Tidy wiring for easy maintenance and reduces the risk of accidents. (Implementation phase)</p> <p>b) Need to raise community awareness on electrical hazards and health and</p>	LGUs/ Municipalities

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
	<p>safety concerns, as well as proper maintenance of solar panels (Implementation and post-implementation phases)</p> <p>c) Need to raise community awareness on proper disposal of solar panels, specifically avoiding disposal of panels near water bodies (Post-implementation phase)</p>	
Access to Sanitation		
Public latrines/toilets	<p>a) All toilets must have a septic tank made from non-permeable material such as concrete, plastic or fiberglass to provide primary treatment of fecal waste. (Implementation phase)</p> <p>b) PVC pipe used to connect pour-flush toilet to a septic tank must be buried underground or covered over (with cement) for protection and to prevent exposure to sunlight. (Implementation phase)</p> <p>c) Metal pipe is a preferred choice to be used as the gas vent pipe on septic tanks. Never use PVC pipe as it is unable to withstand long-term exposure to sunlight. (Implementation phase)</p> <p>d) A toilet should be at least 20 meters from water sources (well, spring, river). (Planning and implementation phases)</p>	LGUs/ Municipalities
Wastewater Systems		
Wastewater sewerage and treatment	<p>a) Septic tanks must have a vent pipe to prevent the build-up of gas inside the chamber and shall have a 'manhole' that provides access inside the tank if needed. (Implementation phase)</p> <p>b) Ensure that the septic tanks have two chambers: first chamber is for settling of sludge, and the second chamber is for aerobic treatment. These chambers will generally treat wastewater better. Partially treated septic tank effluent can pollute groundwater and surface water. (Implementation phase)</p> <p>c) Do not discharge septic tank effluent to an open drain or other surface water. The effluents need to be treated before final disposal. This may be achieved through: (i) an underground leach field, (ii) a vegetated leach field, or (iii) a pit for soaking away. (Implementation phase)</p> <p>d) Community awareness should be raised so that the community inspects the septic tanks periodically and ensures that the septic tanks are emptied every few years for the tank to continue to function properly. (Implementation and post-implementation phases)</p>	LGUs/ Municipalities
Solid Waste Management	<p>a) Solid waste depots/disposal need to be located on hard-standing areas that prevent waste entering surface or groundwater. (Implementation phase)</p> <p>b) Waste depots/storage/disposal should be contained, sealed and/or roofed/covered to prevent storm water contamination. Wastes need to be emptied regularly. (Implementation phase)</p>	LGUs/ Municipalities

b. ESCOPs for Livelihood Support Subprojects

ESCOPs for Livelihood Support Subprojects

Risk/Concern	Environmental Prevention/Mitigation Measures	Responsible Party
General		
To minimize water pollution	<p>a) Avoid any activity causing excessive erosion and turbidity. (Planning phase)</p> <p>b) Keep waste and hazardous materials away from surface water bodies, drinking water sources and do not dispose of waste in creeks or wadis. (Implementation phase)</p> <p>c) Properly dispose contaminated wastewater and hazardous materials, if any, passing through conventional treatment process such as screening, settling, oil-water separation, etc. (Implementation phase)</p>	Component 2 Beneficiaries & NGOs

	<ul style="list-style-type: none"> d) Avoid contamination of drinking water source (e.g. well) from inflow of waste materials and pollutants. (Implementation phase) e) Avoid large-scale animal farming and aquaculture activities in water catchment area. (Planning and implementation phases) 	
To minimize air pollution	<ul style="list-style-type: none"> a) Limit burning post-harvest waste material in close proximity to village; choose days with limited wind for burning; limit number and size of areas for burning per day; do not burn non-agricultural waste such as garbage, plastics or animal waste. Rather than burning post-harvest waste, consider alternative good practices such as composting to produce organic fertilizer or utilization as fuel for bioenergy production. (Planning and implementation phases) b) Reduce dust generation through application of water where practical. (Implementation phase) c) Limit idling of vehicles, machineries equipment. (Implementation phase) 	Component 2 Beneficiaries & NGOs
To minimize noise disturbance	<ul style="list-style-type: none"> a) Repair and maintain machineries for safe and quiet operation. (Implementation phase) b) Avoid emission of continuous/noisy sounds during working. (Implementation phase) 	Component 2 Beneficiaries & NGOs
To minimize soil pollution	<ul style="list-style-type: none"> a) Store petrol / diesel on impermeable floor (e.g. compacted clay, concrete floor) and surrounded by an embankment or berm. (Implementation phase) b) Storage for hazardous materials including petroleum should be above ground and isolated. (Implementation phase) c) Establishing an appropriate disposal area for hazardous materials and waste where prevents hazardous material from leaching into the soil and surface water. (Implementation phase) d) Do not dispose hazardous wastes anywhere except in areas designated by pollution control agencies. (Implementation phase) 	
To minimize impact from non-agricultural waste generation	<ul style="list-style-type: none"> a) Collect waste systematically, store and dispose at appropriately designated dump sites, far away from households. (Implementation phase) b) Reuse and recycle appropriate and viable materials. (Implementation phase) c) Segregate hazardous and non-hazardous wastes. (Implementation phase) 	Component 2 Beneficiaries & NGOs
To minimize emergency risks	<ul style="list-style-type: none"> a) Build appropriately designed infrastructure safe from natural hazards. (Planning and implementation phases) b) Avoid areas prone to natural hazard events (flooding, spring tides, etc.), steep slopes and vulnerable to erosion and landslides, etc. (Planning and implementation phases) 	Component 2 Beneficiaries & NGOs
To secure the safety	<ul style="list-style-type: none"> a) Proper use and management of hazardous materials and waste. (Implementation phase) b) Awareness of dangers on working area, occupation, health and safety equipment through signage where applicable. (Implementation phase) c) Lock storage of fuels, paints, and chemicals. (Implementation phase) 	Component 2 Beneficiaries & NGOs
Agriculture Support to Farmers		
	<ul style="list-style-type: none"> a) Use sustainable agricultural practices / approaches / technologies. (e.g., Agroforestry Practices, Polycultures and Crop rotation, Integrated Pest Management (encouraging the predators of crop-eating pest insects such as birds and bats), etc.) (Planning and implementation phases) b) Reduce top-soil losses from erosion and the reduction in soil fertility. (Cover Crops and Mulches (Establishing leguminous ground cover and applying plant residues), Grass Barriers (planting grass in strips along the contour lines), etc.) (Implementation phase) c) Induce conservation and efficient use of water. (Planning and implementation phases) d) Reduce misuse of agrochemicals, contributing to a reduction of toxic substances in soil and water. (Planning and implementation phases) e) Reduce usage of pesticides and promote integrated pest management approaches recommended by DOA. (Planning and implementation phases) 	Component 2 Beneficiaries & NGOs

	f) Reduce, recycle and reuse the agricultural waste (natural, animal, plant waste). (Implementation phase)	
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Annex 5 - Environmental and Social Management Plan (ESMP) Template

Environmental and social risks and impacts are strongly linked to subproject location and scope of activities. This ESMF should be customized for each specific subproject location and activities.

1. Subproject Information

Subproject Title:	
Estimated Cost:	
Start/Completion Date:	

2. Site/Location Description

This section concisely describes the proposed location and its geographic, ecological, social and temporal context including any offsite investments that may be required (e.g., access roads, water supply, etc.). Please attach a map of the location to the ESMF.

3. Subproject Description and Activities

This section lists all the activities that will take place under the subproject, including any associated activities (such as building of access roads or transmission lines, or communication campaigns that accompany service provision).

4. ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

This section should identify anticipated site-specific adverse environmental and social risks and impacts; describe mitigation measures to address these risks and impact; and list the monitoring measures necessary to ensure effective implementation of the mitigation measures. It may draw from the ESMF's pre-identification of potential risks/impacts and mitigation measures, as applicable, and drill down further to ensure relevance and comprehensiveness at the site-specific level. For subprojects involving construction, two sets of tables may be needed, for the construction phase and the operation phase.

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation		Impact/Mitigation Monitoring		
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility

5. Capacity Development & Training

Based on the implementation arrangements and responsible parties proposed above, this section outlines any capacity building, training or new staffing that may be necessary for effective implementation.

6. Implementation Schedule and Cost Estimates

This section states the implementation timeline for the mitigation measures and capacity development measures described above, as well as a cost estimate for the implementation. The cost estimate can focus on the line items that will be covered by the project implementing agency, with costs of mitigation measures to be implemented by the contractor left to the contractor to calculate.

7. Attachments

ESCOPs, site specific SEP etc.

IV. Review & Approval

<p>Prepared By:(Signature)</p> <p>Position: Date</p>	
<p>Reviewed By:(Signature)</p> <p>Position: Date</p>	<p>Approved By:(Signature)</p> <p>Position: Date</p>

Annex 6 – ESMP Checklist Template

PART A: GENERAL PROJECT AND SITE INFORMATION

- Name of site / project Component / Name of Subproject
- Responsible Entity / NGO
- Description of site location: Could include maps as attachments.
- Ownership verification of the site
- Description of environmental, social, and socioeconomic baseline
- Location and distance for material sourcing, transportation routes, description of operations.
- Brief description of the applicable national and local legislations and permits that apply to the subproject.
- Brief of the public consultation: where it took place, when, with who, and main remarks.
- Brief description of the institutional capacity: if there will be capacity building needed include the capacity building requirements as attachment.

PART 2: ENVIRONMENTAL AND SOCIAL SCREENING

- Insert the result of the Simple E&S Screening Checklist A.

PART 3: MITIGATION MEASURES

The following table can be modified to remove any non-applicable parameters per the screening or to include any additional parameters or site-specific mitigation measures required.

Activity	Risk Category (env. / Soc.)	Potential Risks	Generic Mitigation Measures
	Environmental	Occupational Health and Safety in vocational trainings	-
		Solid Waste generation in vocational trainings	-
		Life and Fire Safety Risks	-
	Social	Social Exclusion and inequitable access to project benefits (vulnerable Groups / Marginalized Groups)	-
		GBV (SEA / SH)	-
		Labor and Working Conditions	-
		Inadequate stakeholder consultation and information disclosure	-

	Environmental	Dust, Emissions, and Impacts on Air Quality	-
		Nuisance (Noise / Vibrations)	-
		Water Resources	-
		Energy Consumption	-
		Biota (Flora & Fauna)	-
		Construction Waste	-
		Municipal Solid Waste	-
		Hazardous Waste	-
		Wastewater	-
		Life and Fire Safety	-
		Traffic and Vehicular Movements	-
		Occupational Health and Safety	-
		Visual Impacts	-
		Historical and Cultural Heritage	-
		Industry Specific Risks (e.g., Pesticides, e-waste)	-
	Social	Risk of Exclusion or Inequitable Access of Marginalized / Vulnerable Groups	-
		GBV (SEA / SH)	-
		Labor and Working Conditions	-
		Inadequate Consultations with Project Stakeholders	-
		Community Health and Safety	-
		Exclusion of Locations and Biased grant management	-

PART 4: MONITORING PLAN

Activity	What Is the parameter to be monitored?	Where Is the parameter being monitored?	How Is the parameter being monitored?	When Define the frequency / or is it continuous?	Who Is responsible for monitoring?
e.g., rehabilitation of facility	Construction waste	Supporting documents of waste disposal, landfill entry fees, transport manifest	Regular inspection	Monthly during construction	LGU

Activity 2					
Activity 3					

Annex 7 - Simplified Labor Management Procedures

In accordance with the requirements of World Bank's Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions, a simplified LMP have been developed for the project. The LMP sets out the ways in which MoPIC, partner, and beneficiary agencies will manage all project workers in relation to the associated risks and impacts. The objectives of the LMP are to: Identify the different types of project workers that are likely to be involved in the project; identify, analyze and evaluate the labor-related risks and impacts for project activities; provide procedures to meet the requirements of ESS 2 on Labor and Working Conditions, ESS 4 on Community Health and Safety, and applicable national legislation.

The Labor Management Procedures apply to all project workers, irrespective of contracts being full-time, part-time, temporary or casual. The types of workers that will be included in the project are listed below:

- **Direct workers** – Direct workers under the project include individuals employed or engaged directly by the Ministry of Planning and International Cooperation (MoPIC), the Municipal Development and Lending Fund (MDLF), and the NGO Development Center (NDC), as well as any other governmental or semi-governmental institutions involved in project implementation, supervision, or coordination. These workers are typically civil servants or seconded personnel, technical staff, safeguards officers, procurement and financial management staff, monitoring and evaluation experts, and field coordinators engaged directly to support project implementation.
- **Contracted workers** – Contracted workers are individuals employed or hired by third parties to perform specific work related to the project. This category includes workers engaged by contractors, suppliers, service providers, NGOs, cooperatives, or other private entities under procurement or partnership agreements. These workers may include construction workers for the rehabilitation of infrastructure (e.g., roads, stormwater and wastewater systems), artisans and skilled workers engaged in the production of handicrafts (e.g., woodworking, tailoring, ceramics, embroidery, candles, mosaics, accessories), as well as trainers, supervisors, and specialized consultants hired under various project components.

Labor Risks

The following potential labor risks are identified under the project:

- Violation of worker's rights: Terms and conditions of employment of workers may not be consistent with national legislation or World Bank standards
- Violation of worker's rights: Non-discrimination and equal opportunity of workers may not be consistent with national legislation or World Bank standards
- Use of child labor
- Unsafe work environment and poor working conditions
- Workplace injuries and accidents, particularly when operating construction equipment, when working at height on building construction, and when handling heavy equipment and materials
- Risks from exposure to hazardous substances (such as dust, cement, chemicals, dyes, adhesives, fumes from handicrafts or woodworking, etc.).

- Sexual exploitation and abuse/sexual harassment (SEA/SH) risks for workers
- SEA/SH risks for community members, from workers from outside the project areas
- Conflicts between workers and communities
- Transmission of communicable diseases among workers or nearby communities.

Relevant National Labor Legislation

Palestinian Labor Law

The Palestinian Labor Law No. 7, 2000 is mandatory to the implementation of the project. The labor law provides workers with the right to form unions on a professional basis and sets minimum requirements for workers' rights and contractual agreements which may not be waived. Chapter 5 of the Labor Law sets the workers' rights and conditions in terms of working hours, overtime, breaks, leaves, wages, and other aspects. In terms of Occupational Health and Safety, articles 90, 91 and 92 set the OHS requirements that the employer must respect and a commitment to the regulations related to OHS issued based on the Labor Law.

Occupational Health and Safety

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

- Decree No.15 contains articles on the maintenance of areas and equipment used by workers and ensuring their cleanliness, as well as providing adequate and sufficient drinking water and the requirements of supply and storage, article 15 also includes requirements on providing separate washrooms for men and women, maintaining their hygiene and specifies that washrooms should be provided one for each 15 male worker and 12 female worker, in addition to other design, accessibility, and servicing requirements. Article 15 includes provisions on providing dining areas and locker rooms and their specifications.
- Decision of Council of Ministers No. (22) of 2003 relates to Initial medical examinations of workers, where it requires hiring workers after conducting a preliminary medical exam, it includes specifications for these exams considering their occupation, gender, age and other aspects. The Decision includes types of exams based on their occupation.
- Decision of Council of Ministers No. (24) of 2003 relates to conducting periodic medical check-ups for workers at least once every 6 months for specific industries and once annually for other specified industries. For workers not mentioned in either one before, periodic check-ups are conducted every two years.
- Decision of Council of Ministers No. (17) of 2003 contains provisions on the requirements of having first aid equipment and kits on facility. It provides accessibility requirements and content minimum requirements as well as labelling and responsibility demarcation for refurnishing and ensuring knowledge of use.
- The Decision of the Council of Ministers No. (49) of 2004 concerning the preventive list of work hazards and career diseases and work accidents. Which contains provisions on the protection of workers' health, providing needed PPEs, training workers on occupational risks and safety measures and designates inspection authority to MoL
- The Decision of the Council of Ministers No. (21) of 2003 on buildings' safety. This includes measures to ensure safety of buildings and mitigating risks related to workers OHS relevant to falls, distance from inhabited areas, machinery usage, noise and aspects related to design and planning of buildings and facilities.
- The Decision of Minister of Labor No. (1) of 2004 on hazardous occupations in which children under the age of 18 are prohibited to be employed. These include hazardous industries and activities which could affect the health, safety, and wellbeing of children.

- The Decision of the Council of Ministers No. (47) of 2004 related to occupational diseases and occupational injuries, which includes reporting requirements to MoL as well as notification timeline depending on specified cases in the decision. It also provides periodic reporting requirements with statistics related to each facility on occupational diseases and injuries and provides a standardized reporting form.
- Instructions by the Minister of Labor no. (1) of 2005 concerning the precautions to protect workers in construction sites. Which includes safety measures and equipment use related to different aspects in construction sites such as scaffolding, ladder use, inspection of equipment, walking boards, fencing, fall protection equipment, helmets and other PPEs. In addition to measures on lighting, noise, electrical hazards and others.
- Instructions by the Minister of Labor no. 2-6 of 2005, define 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.

Decree on Minimum Wage

The minimum wage in the Palestinian Territories was set in 2012 by decree No. 11 and based on the Labor Law (7) of 2000. In 2021, an update to the minimum wage has been set by decree No. 4, establishing the specific minimum wage for workers at 85 ILS/day (25\$US), 10.5 ILS/hr. (3.15\$US) and the minimum wage for employees is 1880 ILS/month (565\$). A labor agreement will determine the form and amount of remuneration. Remuneration will be paid at least once a month. The company shall be committed to this decree and any future updates to it that govern labor rights in terms of minimum wage.

General Applicable Procedures

MoPIC, implementing agencies, and contractors will apply the following guidelines when dealing with workers:

- There will be no discrimination with respect to any aspects of the employment relationship, such as: Recruitment and hiring; compensation (including wages and benefits; working conditions and terms of employment; access to training; job assignment; promotion; termination of employment or retirement; or disciplinary practices.
- Harassment, intimidation and/or exploitation will be prevented or addressed appropriately.
- Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination.
- Vulnerable project workers will be provided with special protection.
- [Implementing agency] and contractors will provide job / employment contracts with clear terms and conditions including rights related to hours of work, wages, overtime, compensation and benefits, annual holiday and sick leave, maternity leave and family leave. Code of Conduct included in this LMP will be applicable for all project workers.
- [Implementing agency] will ensure compliance with the Code of Conduct including providing briefings/awareness raising on the Code.
- [Implementing agency] and contractors will ensure compliance with occupational health and safety procedures and COVID-19 specific procedures (see below) including that the workers are properly trained in application of the standards that are relevant to the work.
- [Implementing agency] and retained contractors will ensure no person under the age of 18 shall be employed. Age verification of all workers will be conducted by the contractors.
- [Implementing agency] will recruit contractors and labor locally to the extent that they are available.
- Workers shall be recruited voluntarily, and no worker is forced or coerced into work.

- [Implementing agency] will supervise and monitor to ensure compliance with the above requirements.
- All workers will be made aware of the Worker's Grievance Mechanism (see below) to raise work related grievances, including any sensitive and serious grievances on SEA/SH.

Occupational Health and Safety (OHS) Procedures

The objective of the procedure is to achieve and maintain a healthy and safe work environment for all project workers and the host community.

- On procurement for contractors or on steering agreement with municipalities or LGUs or NGOs or beneficiaries MoPIC, MDPL, NDC will avail the ESMF to the aspiring contractors so that contractors include the budgetary requirements for OHS measures in their respective bids.
- The contractor municipalities or LGUs or NGOs or beneficiaries, will develop and maintain an OHS management system that is consistent with the scope of work, which must include measures and procedures to address all the following topics listed below and in accordance with local legislation and GIIP (as defined by World Bank Group EHSs). The management system must be consistent with the duration of contract and this LMP.
- Contractor or municipalities or LGUs or NGOs or beneficiaries, will conduct workplace hazards identification and adopt all applicable E&S risk mitigation measures in accordance with local legislation requirements and WBG EHSs.
- Contractor or municipalities or LGUs or NGOs or beneficiaries, designates a responsible person to oversee OHS related issues at the project site and define OHS roles and responsibilities for task leaders and contract managers.
- Contractor or municipalities or LGUs or NGOs or beneficiaries should put in place processes for workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health, without fear of retaliation.
- Contractor or municipalities or LGUs or NGOs or beneficiaries provides preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances informed by assessment and plan. Whenever PPEs are required for the work, it must be provided at no cost for the workers.
- Contractor or municipalities or LGUs or NGOs or beneficiaries should assess workers' exposure to hazardous agents (noise, vibration, heat, cold, vapors, chemicals, airborne contaminants etc.) and adopt adequate control measures in accordance with local regulations and WB EHSs.
- Contractors or municipalities or LGUs or NGOs or beneficiaries provides facilities appropriate to the circumstances of the work, including access to canteens, hygiene facilities, and appropriate areas for rest. Where accommodation services are provided to project workers, policies will be put in place and implemented on the management and quality of accommodation to protect and promote the health, safety, and well-being of the project workers, and to provide access to or provision of services that accommodate their physical, social and cultural needs.
- Contractor or municipalities or LGUs or NGOs or beneficiaries provides for appropriate training/induction of project workers and maintenance of training records on OHS subjects.
- Contractor or municipalities or LGUs or NGOs or beneficiaries documents and reports on occupational incidents, diseases and incidents as per ESMF guidance.
- Contractor or municipalities or LGUs or NGOs or beneficiaries provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited

to workplace accidents, workplace illnesses, flooding, fire outbreak, disease outbreak, labor unrest and security.

- Contractor or municipalities or LGUs or NGOs or beneficiaries provides remedies for adverse impacts such as occupational injuries, deaths, disability and disease in accordance with local regulatory requirements and Good International Industry Practices.
- Contractor or municipalities or LGUs or NGOs or beneficiaries shall maintain all such record for activities related to the safety health and environmental management for inspection by MoPIC or MDLF or NDC or the World Bank.

Contractor Management Procedures

The objective of this procedure is to ensure that MoPIC and the implementing agencies have contractual power to administer oversight and action against contractors for non-compliance with the LMP.

- MoPIC and the implementing agencies will make available relevant documentation to inform the contractor about requirements for effective implementation of the LMP.
- MoPIC and the implementing agencies will include the provisions of the ESMF, LMP and other relevant documents into the specification section of the bidding documents. The contractors will be required to comply with these specifications.
- Contractor will raise worker awareness on the Code and Conduct.
- Contractor will show evidence of OHS and Emergency Preparedness procedures.
- MoPIC and the implementing agencies will monitor contract's E&S performance during its regular site visits utilizing contractor reporting or external monitoring/supervision consultants where available. Where appropriate, [implementing agency] may withhold contractor's payment or apply other contractual remedies as appropriate until corrective action(s) is/are implemented on significant non-compliance with the LMP, such as failure to notify [implementing agency] of incidents and accidents.

Institutional Arrangement for Implementation of the LMP

MoPIC and the implementing agencies will carry the main responsibility for the implementation and monitoring of the LMP. The will identify subproject activities, prepare subproject designs and bidding documents, as well as procure contractors. MoPIC and the implementing agencies will be responsible for contractor and site supervision, technical quality assurance, certification, and payment of works. MoPIC and the implementing agencies will ensure that labor management procedures are integrated into the specification section of the bidding documents and the procurement contracts.

Grievance Mechanism

There will be a specific Workers Grievance Mechanism (Worker GM) for project workers as per the process outlined below. This considers culturally appropriate ways of handling the concerns of direct and contracted workers. Processes for documenting complaints and concerns have been specified, including time commitments to resolve issues. Workers will be informed about the relevant Worker GM upon their recruitment and their right to redress, confidentiality and protection against any reprisals from the employer will be stated in the contract.

Routine Grievances

The process for the Worker GM is as follows:

The Worker Grievance Mechanism (Worker GM) for the project will follow the same structure and implementation arrangements described in the SEP, and will be handled at the level of each implementing agency and partner, while ensuring consistency with ESS2 requirements. Workers will have multiple accessible channels to submit grievances, including in person, by phone, email, text messages, complaint boxes, or through the established GM online platforms. Anonymous complaints will be accepted and handled.

At the first level, grievances will be submitted to the worker's immediate employer. For Component 1, this will be the contractor or LGU focal point; for Component 2, the NGO; and for Component 3, MoA, MoLG, MoL, and MoPIC depending on the activity. Each implementing agency and partner will maintain a dedicated GM focal point responsible for registering and addressing worker grievances. Grievances resolved at this level and will be documented and reported to the relevant implementing agency's GM coordinator.

If the grievance is not resolved at this initial level, or if the worker wishes to escalate it, the grievance will be referred to the implementing agency level: MDLF for Component 1, NDC for Component 2, and MoPIC for Component 3. The respective E&S focal points will review and work to resolve the complaint within 14 calendar days. For grievances involving OHS concerns, GBV/SEA/SH allegations, or any urgent risks to worker safety or dignity, the grievance will receive immediate attention and be processed on a priority and confidential basis following the survivor-centered approach described in the SEP.

If the grievance remains unresolved, the worker may escalate it to MoPIC's PMU Social Specialist as the central project-level GM focal point, who will review the case and ensure timely resolution. Where the complaint cannot be resolved through the project's internal procedures, workers will retain their right to seek legal remedies through the national judicial system as provided by national labor law.

All grievances will be logged and documented, using standardized grievance logs across all implementing agencies, disaggregated by nature of grievance, gender, and status. The MoPIC Social Specialist will oversee monitoring, reporting, and quality control of the Worker GM across the project and will consolidate reporting to the World Bank as part of the regular E&S reporting obligations.

The workers will preserve all rights to refer matters to relevant judicial proceedings as provided under national labor law.

Each grievance record should be allocated a unique number reflecting year, sequence and township of received complaint. Complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy. MoPIC's social specialist will be responsible for undertaking a quarterly review of all grievances to analyze and respond to any common issues arising.

Serious Grievances

In case a worker experiences serious mistreatment such as harassment, intimidation, abuse, violence, discrimination or injustice at the workplace, the worker may raise the case, verbally or in writing directly to the contractor or implementing agencies – at different levels. The contractor will immediately refer the case to MoPIC's social specialist. In turn, MoPIC's social specialist will refer the case to the Minister and

relevant departments, or if GBV (SEA /SH) related, through the GBV (SEA /SH) referral pathways, if approved by the survivor.

In case a direct worker or civil servant has a serious grievance, the staff may directly contact verbally or in writing the Focal Person for Serious Grievances.

All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.

Code of Conduct

- Treat women, children (persons under the age of 18), and men with respect regardless of ethnicity, language, religion, political or other opinion, national, social origin, citizenship status, property, disability, birth or other status.
- Do not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Do not participate in sexual activity with community members.
- Do not engage in sexual favors or other forms of humiliating, degrading or exploitative behavior.
- Do not engage in any activity that will constitute payment for sex with members of the communities surrounding the workplace.
- Report through the Worker GM suspected or actual gender-based violence against a person of any gender by a fellow worker or any breaches of this Code of Conduct.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass women, children or a vulnerable person through these mediums.
- Comply with all relevant local legislation.
- Engaging in any of the prohibited activities above can be cause for termination of employment, criminal liability, and/or other sanctions.

Annex 8 - Chance Find Procedures

LGUs subprojects' civil works involving excavations should normally incorporate procedures for dealing with situations in which buried Physical Cultural Resources (PCR) are unexpectedly encountered. The final form of these procedures will depend upon the local regulatory environment, including any chance find procedures already incorporated in legislation dealing with antiquities or archaeology. For project components, chance finds procedures contain the following elements:

- **PCR Definition:** The definition of PCRs includes any movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. PCRs may be located in urban or rural settings, and may be above or below ground, or under water.
- **Recognition:** A clause on chance finds should be included in general specifications section of the bidding document of sub-project or LGUs grant agreements.
- **Chance Find Procedures:** In case of accident findings of any antiquities or PCRs that might occur during the implementation of the subproject, the contractor, and LGUs must notify ESO/MDLF who will immediately liaise with appropriate officials from MoTA. According to the applicable Jordanian Heritage law No. 51 for the year 1966, Article 15. MDLF must stop the contractor, and LGUs and notify MoTA within 3 days to take necessary actions.

In addition, the contractor should be familiar with the following "Chance Finds Procedures" in case accident chance find of any culturally valuable materials during excavation:

- Stop work immediately following the chance find of any possible archeological, historical, paleontological, or other cultural value; inform the environmental specialist;
- Protect artifacts as well as possible using plastic covers; implement measures to stabilize the area, if necessary, to properly protect artifacts;
- Prevent and unauthorized access where finding occurred; and
- Restart construction works only upon the authorization of the relevant authorities.

In the event that during construction, sites, resources or artifacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents or Municipalities and LGUs grant agreement. These procedures take into account requirements related to Chance Finding under national legislation including Jordanian Heritage law No. 51 for the year 1966, Article 15.

- Stop the construction activities in the area of chance find temporarily.
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a guard shall be arranged until the responsible local authorities take over. These authorities are Ministry of Tourism and Antiquities (MoTA) .
- Notify the relevant MDLF LTC and ESO and the relevant Ministry of Tourism and Antiquities (MoTA) immediately. MDLF ESO will inform the MoPIC
- The relevant MoTA shall promptly carry out the necessities and inform the MOTA] immediately from the date on which the information is received.
- The MoTA would be in charge of evaluation /inspection of the significance or importance of the chance finds and advise on appropriate subsequent procedures.
- If the MOTA determines that chance find is a non-cultural heritage chance find, the construction process can resume.
- If the MoTA determines chance find is an isolated chance find, MoTA would provide technical supports/advice on chance find treatment with related expenditure on the treatment provided by the entity report the chance find.

Annex 9 - Fertilizer and Pest Management Plan

MoPIC, MDLF, and NDC will follow the guidelines in this Annex as applicable and provide training to farmers for proper use of fertilizers, pest and disease management in line with this Annex. MoPIC, MDLF, and NDC will encourage the use of bio-pesticides and aim to minimize the use of chemical pesticides when possible.

The plan comprises the following three aspects: (i) application of government regulations on pesticide control, (ii) key impacts of pesticides and mitigation measures, and (iii) training on safe use of chemicals.

Government Regulations related to Pesticides. Council of Ministers Resolution No. 9 of 2012 on the system of agricultural pesticides¹ consisting of 73 articles aims at issuing a strict pesticides management system in the Palestinian Authority territory setting rules on pesticides in terms of import, export, and registration processes. It establishes a scientific Committee to determine the types of pesticides that can be used and to monitor and control their quality. The Committee is also charged with publishing each

year, and distributing to stakeholders, a record of the pesticides registered. It lays down some definitions of significant terms (Art.1). Article 4 prohibits the use of pesticides that are (i) banned for use in the Occupied West Bank; (ii) banned for use in their country of origin for health or environmental reasons; (iii) classified by the World Health Organization or the US Environmental Protection Agency as causing cancer or birth defects or genetic mutations, or severe toxicity to humans or animals; and (iv) being groundwater pollutants¹. . Palestinian Environmental Law No 7 of 1999 (1999) addresses various environmental issues including Pest control products

The MOH plays a central role in regulating the chemical products used in pest control. It is responsible for approving and updating the list of pesticides—verified annually—that can be imported, sold, and applied in the region. This ensures that every pesticide on the market meets rigorous safety standards applicable to human health and the environment. Also, the MOH monitors any adverse health effects related to pesticide use. This monitoring process includes evaluating scientific evidence, maintaining records of incidents, and, when necessary, revoking approvals if new risks emerge.

The MOA is responsible for implementing and promoting integrated pest management (IPM) practices within the agricultural sector. This includes advising farmers on effective, environmentally sound techniques to control pests while minimizing reliance on chemical pesticides. By working closely with agricultural extension services and research institutions, the ministry disseminates best practices regarding pest control. It also coordinates responses to crop infestations, ensuring that any chemical interventions support both productivity and environmental sustainability

Many municipalities and LGUs in the West Bank and Gaza are responsible for providing the necessary services for protecting and controlling the public health from pests and other kinds of reptiles. The used pesticides must be certified by the Palestinian MOH.

As well for many municipalities and LGUs in West Bank and Gaza Strip that are responsible for agricultural and greenery sections to improving the public parks and gardens at their towns, might request pest control materials that is used for agriculture, these pest control material shall comply to Food Agricultural Organization (FAO) and WHO permissible list , additionally to have these material approved by the Palestinian Ministry of Agriculture (MOA).

The permissible list

The MOH approved list of pesticides for the year 2016 (updated annually), considering the active ingredient, the formulation and the use, where Municipalities, LGUs, NGOs beneficiaries are to ensure pesticides must carry a valid license / certificate issued by the relevant authorities (MOH, MOA) stating that the pesticide is licensed for use for public health/agriculture purposes considering that its shall be well sealed, packed, and stamped. Noting that this list complies and more restrict than WHO acceptable pesticide list.

Table 1: Insecticides approved by Ministry of Health 2016 (MOH, 2016)

Active Ingredient	Formulation	Use
Cypermethrin 20 %	Emulsifiable concentrate (EC)	Control of flies and mosquitoes

Permethrin 20 % (Cis: Trans 25:75)	Emulsifiable concentrate (EC)	- Control of flies and mosquitoes. - It should be suitable to dilute in water for spraying and suitable for fogging application.
Cyfluthrin 50 gr / L	Emulsifiable concentrate	Control of cockroaches, bedbugs and flying insects
Deltamethrin 15-16 gr/L	Emulsifiable concentrate (EC) or Emulsion concentrate (EW)	Control of cockroaches, bedbugs and flying insects
Brodifacoum 0.005	- Ready to use bait - Blocks - Weight: 20-30 gr.	Control of rats and mice
Isopropylamine salt of Glyphosate (equivalent to 360 gr./L glyphosate)	Emulsifiable concentrate	Herbicide
Bacillus thuringiensis var israelensis 1200 ITU/mg	Aqueous suspension	control of mosquito larvae
Temephos 1 (mg/L)	granule, emulsifiable concentration	control of mosquito larvae

The following tables list the allowed WHO material to procure mosquito larvae controls and verified to the market and eligibility in the Palestinian market as per MOH. It worth mentioning that the WHO application procedure considers liquid formulations for indoor usage, granular formulation might be implemented; precautions recommended not to exceed the dosage.

Table: WHOPES-Recommended Compounds and Formulations for Control of Mosquito Larvae

Insecticide ¹	Class group ²	DOSAGE	
		General (G/HA)	Container breeding (mg/L)
Bacillus thuringiensis Israelensis strain AM65-52, WG (3000 ITU/mg)	BL	125-750 ³	1-5 ³
Bacillus thuringiensis Israelensis strain AM65-52, GR (200 ITU/mg)	BL	5,000-20,000	-
Temephos EC, GR	OP	56-112	1

¹DT: tablet for direct application, GR: granule, EC: emulsifiable concentration, WG: water-dispersible granule, WP: wettable powder

²BL: Bacterial Larvicide, BU: Benzoylureas, JH: Juvenile Hormone Mimics, OP: Organophosphates, SP: Spinosyns

³Formulated product

Similarly for baits; Table 3 list the allowed insecticides used in toxic baits for fly control according to WHO, 2006 regulation and verified according availability and eligibility in the Palestinian market as per MOH considering target area is where adult flies congregate to feed, on the other hand the WHO application procedure where dry and liquid implemented. Most important precaution not to place the baits close neither to children nor to domestic animals.

Table 3: Insecticides used in toxic baits for fly control (WHO, 2006)

Insecticide	Chemical type	WHO hazard classification of a ^{ia}
Spinosad	Biopesticide	U

ai, active ingredient

a Class II, moderately hazardous; class III, slightly hazardous; NA, not available

Key Impacts of Pesticides and Mitigation Measures.

Pesticides benefit the farmers for the crop production, nevertheless, they also impose a series of negative impacts on the environment. Pesticides may easily contaminate the air, ground water, surface water, and soil when they run off from fields, escape storage tanks, and not discarded properly.

Moreover, pesticides are hazardous to both pests and humans and they become toxic to humans and non-target animal species if suitable precautions are not undertaken during transport, storage, handling and disposal. Most pesticides will cause adverse effects if they are in contact with the skin for a long time or if intentionally or accidentally ingested. Pesticides may be inhaled with the air while they are being sprayed. An additional risk is the contamination of drinking-water, food or soil.

The following mitigation measures are recommended from different aspects at every stage in order to avoid the adverse impacts on both human and the environment due to pesticides.

Stage	Mitigation Measures ¹
Before using pesticides	<ol style="list-style-type: none"> 1. Minimize the need for pesticides by practicing integrated management by control strategies such as cultural control, mechanical control, physical control, biological control and chemical control. 2. Receive recommendations from [relevant national agencies] for proper management method for specific crop.
General precautions	<ol style="list-style-type: none"> 1. Only choose the pesticides labelled in the national language and do not use the pesticides without any label or with foreign language labels. 2. Select the pesticide which is suitable for specific pests and target plants as described on the label. 3. Do not mix any two or more pesticides at the same time. 4. Follow the instructions for use and the pre-harvest interval (PHI) as prescribed on the label. 5. Use appropriate and correct application techniques to ensure safety for the health of humans, animals and the environment.

Stage	Mitigation Measures ¹
Label Reading	<ol style="list-style-type: none"> 1. Check the pesticide registration number on your product. 2. Review the date of manufacture and date of expiry. 3. Read the active ingredient and pesticide group on your product. 4. Read the target pests, dosage of product. 5. Read the pre-harvest interval (PHI). 6. Read the storage and disposal procedure for the product. 7. Read the first aid procedure. 8. Follow the instructions and safety precautions precisely written on the label.
Storage and Transport	<ol style="list-style-type: none"> 1. Store pesticides in a certain place that can be locked and not accessible to unauthorized people or children. 2. Never be kept in a place where they might be mistaken for food or drink. 3. Keep them dry but away from fires and out of direct sunlight. 4. Store away from water sources. 5. Should be transported in well-sealed and labelled containers. 6. Do not carry them in a vehicle that is also used to transport food.
Handling / Application	<p>From Environmental Safety Aspect –</p> <ol style="list-style-type: none"> 1. Application rates must not exceed the manufacturer's recommendations. 2. Avoid application of pesticides in wet and windy conditions. 3. Pesticides must not be directly applied to streams, ponds, lakes, or other surface bodies. 4. Maintain a buffer zone (area where pesticides will not be applied) around water bodies, residential areas, livestock housing areas and food storage areas. <p>From Health and Safety of User Aspect –</p> <ol style="list-style-type: none"> 1. Use suitable equipment for measuring out, mixing and transferring pesticides. 2. Do not stir liquids or scoop pesticides with bare hands. 3. Do not spray pesticides at the down-stream direction and during the strong wind. 4. Do not spray pesticides at the high temperature of the day (noon). 5. Do not suck or blow the blocked nozzle. 6. Do not assign pregnant women, lactating mother and children under 18 for handling and use of pesticides. 7. Protective gloves, shoes, long-sleeved shirt and full trousers shall always be worn when mixing or applying pesticides. 8. Respiratory devices (nose mask) shall be used to avoid accidental inhaling. 9. In case if any exposure/body contact with the pesticide, wash-off and seek medical aid.
Disposal	<p>From Environmental Safety Aspect –</p> <ol style="list-style-type: none"> 1. Dispose any left-over pesticide by pouring it into a pit latrine. 2. It should not be disposed of where it may enter water used for drinking or washing, fish ponds, creeks or rivers. 3. Do not dispose any empty containers into river, creek, fish ponds and water way. 4. Do not burn any empty containers. 5. Decontaminate the pesticide containers by triple rinsing and use for next application. i.e. part-filling the empty container with water three times and emptying into a bucket or sprayer for next application. 6. All empty package and containers should be returned to the designated organization / individual for safe disposal.

Stage	Mitigation Measures ¹
	<p>7. If safe disposal is not available, bury the empty package and containers at least 50cm (20 inches) from ground level as much as possible.</p> <p>8. The hole / disposal site must be at least 100 meters (~300 ft) away from the streams, wells and houses.</p> <p>9. Do not reuse empty pesticide containers for any purposes.</p>
Personal Hygiene	<p>1. Never eat, drink or smoke while handling pesticides.</p> <p>2. Change clothes immediately after spraying pesticides.</p> <p>3. Wash hands, face, body and clothes with plenty of water using soap after pesticides handling.</p>
Emergency Measures	<p>Indications of Pesticide Poisoning</p> <p>General: extreme weakness and fatigue.</p> <p>Skin: irritation, burning sensation, excessive sweating, staining.</p> <p>Eyes: itching, burning sensation, watering, difficult or blurred vision, narrowed or widened pupils.</p> <p>Digestive system: burning sensation in mouth and throat, excessive salivation, nausea, vomiting, abdominal pain, diarrhea.</p> <p>Nervous system: headaches, dizziness, confusion, restlessness, muscle twitching, staggering gait, slurred speech, fits, unconsciousness.</p> <p>Respiratory system: cough, chest pain and tightness, difficulty with breathing, wheezing.</p> <p>Responsiveness</p> <p>General:</p> <p>If pesticide poisoning is suspected, first aid must be given immediately and medical advice and help must be sought at the earliest opportunity. If possible, the patient should be taken to the nearest medical facility.</p> <p>First Aid Treatment</p> <p>If breathing has stopped: Give artificial respiration (i.e. mouth to mouth resuscitation if no pesticide has been swallowed.)</p> <p>If there is pesticide on the skin: Remove contaminated clothing from the patient and remove the patient from the contaminated area. Wash the body completely for at least 10 minutes, using soap if possible. If no water is available, wipe the skin gently with cloths or paper to soak up the pesticide. Avoid harsh rubbing or scrubbing.</p> <p>If there is pesticide in the eyes: Rinse the eyes with large quantities of clean water for at least five minutes.</p> <p>If there is ingestion: Rinse mouth, give water to drink. Never induce vomiting in unconscious or confused persons, seek medical advice immediately.</p>

In addition, the following criteria apply to the selection and use of pesticides in any sub-project-financed under the project:

- i. They must be in MOH and WHO list of recommended compounds.
 - ii. They must have negligible adverse human health effects.
 - iii. They must be shown to be effective against the target species.
 - iv. They must have minimal effect on non-target species and the natural environment. The methods, timing, and frequency of pesticide application are aimed to minimize damage to natural enemies. Pesticides used in public health programs must be demonstrated to be safe for inhabitants and domestic animals in the treated areas, as well as for personnel applying them.
 - v. Their use must take into account the need to prevent the development of resistance in pests.
- For sub-project screening, pest control initial screening section was added to the Environmental Screening (Annex 1). Furthermore, any pesticide financed under the project must be manufactured, packaged, labeled, handled, stored, disposed of, and applied according to Palestinian standards.

In reference to the Local Council Law no.1 for year 1997/Article (15) municipalities in West Bank and Gaza Strip are responsible for protecting and controlling the public health within their villages and cities and conducting the needed arrangements to clean and kill insects, pests, and other reptiles. Those municipalities responsible for purchasing needed pesticides should follow special arrangements specified by the Palestinian Ministry of Health, these instructions are as following:

1. The contractor and pesticide supplier should include in the bidding documents a certification indicating that the offered material is licensed by the MOA / MOH as material accepted to be used with no effect on public health;
2. Certifications should be original and written in English or Arabic;
3. The material should include a data sheet clarifying the production date and expiry date clearly, which should not be less than two years from the date of purchasing the material by the municipality;
4. The materials should be inspected by a licensed laboratory (usually it is inspected by the laboratory at the MOH) and the cost of inspection should be covered by the provider;
5. Supply only pesticides of adequate quality, packaged and labeled as appropriate.
6. Pay special attention to formulations, presentation, packaging and labeling in order to reduce hazard to users, to the maximum extent possible consistent with the effective functioning of the pesticide in the particular circumstances in which it is to be used; and
7. Provide, with each package of pesticide, information and instructions in a form and language adequate to ensure safe and effective use.

Measures for Using and Storing of Pesticides

Municipalities are used to use the pesticide during the summer semester starting in May until September on a daily basis and at specific time shortly before the sun set. Large municipalities with different residential areas are usually designated into sections for easy access and within the capacity of the municipality and availability of pest-control spraying machines.

The following is a set of mitigation measures that shall be considered before and during spraying process of the pesticides:

1. Specify and inform citizens in advance about the spraying time and nominate in advance the number of workers responsible for the spraying.
2. Supervision of the spraying process should continue during the whole designated spraying period which usually during summer semester.
3. Storage of pesticide should be in a well identified storage space with limited access to those other than municipal staff and inspection teams.
4. Disposal of used canisters or containers should follow the proper international procedures and applicable regulations.

In addition, the municipality should comply with the instructions provided in the pesticide package and those instructions promoted by MOH.

Trainings. Trainings on pesticide management should be provided to the farmers under relevant component of the project. The following trainings on pesticide management are recommended to be provided:

- *Training on Policy, Laws and Regulations Regarding to Pesticides Use:* To provide basic knowledge about the national laws, rules and regulations.
- *Trainings for Pest Management:* To provide trainings to clearly understand the technical aspect of pesticide and skill in using them such as what are the eligible and prohibited items of pesticide under national regulations, the level of negative impact of each eligible item, how to use them, how to protect and minimize the negative impact on the environment and human while using them, how to keep them before and after used etc.
- *Storage, handling, usage and disposal of pesticide;* To provide trainings about the procedures of storage, handling, usage of pesticide and disposal of pesticides residues or empty containers without affecting the health and safety of user, nearby community and the environment.

Annex 10 - Expanded Environmental and Social Policies, Regulations, and Laws

I. National Environmental and Social Policies, Laws, and Legislation

Table 12: Palestine Relevant Legal Framework

Law	Description and Relevance to Project Activities
The Palestinian Basic Law (2003)	The Palestinian Basic Law asserts the right, in its article 33, to a “clean and a balanced environment as a basic right of every Palestinian” and the national duty for “preservation of the Palestinian environment for the sake of both present and future generations”. The Palestinian Basic Law functions as a temporary constitution for the Palestinian Authority.
Palestinian Environmental Law No 7 of 1999 (1999)	The Palestinian Environment Law covers the main issues relevant to environmental protection and law enforcement. The law addresses various environmental issues including: <ul style="list-style-type: none"> • Management and protection of various resources. Issues covered are related to land environment, air environment, water resources and aquatic environment, and natural, archeological, and historical heritage protection. • Environmental Impact Assessment (EIA) and auditing, permitting of development projects, monitoring of environmental resources and their parameters. • Penalties to be applied in case of violation of any article presented under the law. • Other issues addressed by the legislation include emergency preparedness, public participation, research training and public education. • Pest control products
The local councils law No.1 issued in 1997	The local council law issued in 1997 has replaced the old law and is currently the prevailing councils law (the local council law has replaced the Municipalities Law No. 29

	<p>of 1955 in for the provinces of the West Bank, the Municipalities Law No. 1 of 1934 for the Gaza Strip, the Law on Management of villages No. 5 of 1954 for the provinces of the West Bank and the Law on Management of villages No. 23 of 1944, for the Gaza Strip). The local council law was amended by the 2008 Law by Decree No. 9. The Local Authorities Law stipulates 27 areas that are under the LGUs' responsibility, namely (Town planning, Building licensing and construction control, Water supply, Electricity supply, Sewage management, Public markets management, Licensing of trades and businesses, Public health monitoring, Collection and disposal of solid waste, Public storage control, Public parks, Cultural and sports activities, Public transport (land and sea), Control of peddlers and open markets, Weights and measures control, Advertisement control, Building demolition, Disposal of remnants of roads, Social services for the poor, Cemeteries, Precautions against floods, fires and natural disasters, Hotel operation control, Regulation of pack animals, Canine control, Budget approval and management, and Management of the local government's assets and funds).</p> <p>In 2011, the Council of Ministers issued the Council of Ministers' Decision No. 6 on Buildings and Regulation of Local Authorities (2011), which included new regulations, which amended the Building and Zoning bylaw that was based on the Jordanian law of 1966.</p> <p>In 2020, the Council of Minister issued the Council of Minister' Decision No. 13 to amend the Buildings and Regulation of Local Authorities (2020)</p>
Labor Law No. 7 (2000) and the minimum wage act No. 4 of 2021	<p>The Law was ratified in 2000 and replaced the 1960 Jordanian Labor Law in the West Bank and the 1964 Egyptian Labor Law in the Gaza Strip. Labor Law No. 7 is organized into 10 sections covering number of issues:</p> <ul style="list-style-type: none"> • General Provisions and Principles section: Makes work a right for each workable citizen; • Employment, Occupational Training and Guidance. • The Individual Work Contract section covers the various methods of agreement, the composition of the contract, its duration, expiration and termination. • Collective Labor Relations are summarized in the Labor Unions section. • Requirements and Conditions of Work section covers working hours and weekly holidays, leave, salaries and occupational safety and health. • Regulation of the Work of Minors (from 15 to 18 years old). • Regulation of the Work of Women section. • The Labor Inspection section authorizes members of The Commission of Labor. Inspection to enter the workplace, make inquiries with employers and/or workers. • Work Injuries and Occupational Diseases • Penalties and Conclusive Provisions <p>The Labor Law No. 7 is supplemented with about 30 bylaws that were ratified during 2003, 2004, 2005 and 2006.</p> <p>The minimum wage in the Palestinian Territories was set in 2012 by decree No. 11 and based on the Labor Law (7) of 2000. In 2021, an update to the minimum wage has been set by decree No. 4, establishing the specific minimum wage for workers at 85 ILS/day (25\$US), 10.5 ILS/hr. (3.15\$US) and the minimum wage for employees is 1880 ILS/month (565\$). A labor agreement will determine the form and amount of remuneration. Remuneration will be paid at least once a month.</p>
Law no. 20 of Public Health, 2004	<p>The Public Health Law requires the Ministry of Health (MoH) to offer certain types of health services to Palestinians including: safe drinking water, environmental safety, and public health infrastructure.</p> <p>The Public Health Law No. 20, 2004 lists MOH functions and responsibilities, which include delivery of the government's preventive, diagnostic, curative and rehabilitative health services; regulation of the health sector functioning to ensure high level of harmonized and integrated work between the different service providers and sectors;</p>

	<p>development of national health regulations, laws, and policies; and reinforcement of the health financing system and optimal investment of the available resources.</p> <p>Articles 9 and 15 designate the authority to the Palestinian Ministry of Health (MoH) for combatting and monitoring the spread of infectious diseases. Article 31 states that all works that may have an impact on public or environmental health must obtain a written permit from the MoH.</p> <p>Chapter 4 of the Law includes MoH's role in food safety, the chapter includes the requirements for licensing imported and locally manufactured food products, it includes laboratory testing, inspections and penalty clauses relevant to food products safety. Per chapter 5 on Occupational Health and Safety (OHS), MoH has the authority to establish the necessary OHS requirements for the workplace and to conduct regular inspections, where article 32 is related to the OHS regulations that must be applied at workplaces. Per article 34, workers must comply with all OHS instructions at the workplace. And article 36 is related to environmental and health awareness and instructions. Articles 39 and 40 are related to the control of environmental and health-related pollution.</p>
Law no. 2 of Agriculture, 2003; and Decree-Law No.14 of 2018 amending the 2003 law.	<p>The law aims at enabling the sustainable use of natural resources, the agricultural capital, and forestry and forest trees. The law also aims at preventing the decline in the production value of land uses due to climate change and humanitarian activities. Decree Law No. 14 of 2018 Amending the Agriculture Law No. 2 of 2003 introduces updated definitions and provisions to strengthen environmental and public health safeguards in agricultural practices. It reclassifies agricultural land by value (high, medium, low), restricts non-agricultural development on high-value lands, and reinforces the protection of forest lands. The amendment introduces concepts like biosecurity, soil protection, and stricter controls over fertilizers, pesticides, and veterinary practices. It also establishes clear penalties for violations, including the unauthorized cutting of trees, misuse of agricultural inputs, and breaches of plant and animal health standards.</p>
Law No. 1 of 2000 Concerning Charitable Associations and Civil Society Organizations	<p>The Law covers several key areas to regulate the sector. It outlines the establishment and registration process for organizations, defines their organizational structure and governance, and sets guidelines for financial management and reporting. The law also regulates the acceptance of foreign funding and donations and emphasizes the rights and duties of Charitable Associations and Civil Society Organizations to ensure accountability. Additionally, it includes provisions for supervision and monitoring to ensure compliance, promotes the public benefit and objectives of charitable work, and sets procedures for dissolution and liquidation. The law also outlines penalties and legal consequences for violations and provides mechanisms for dispute resolution.</p>
• Palestinian Cabinet Decree on Adopting the General Policy for the Disposal and Treatment of Electronic Waste – June 2021 (02/113):	<p>This decree sets the requirements for the management and disposal of e-waste generated from governmental and public institutions and provides the definition of e-waste as hazardous waste. The decree sets forward the collection, storage, transportation, auctioning, and disposal requirements of e-waste resulting from public institutions.</p>
Land Ownership Law 3, 2011	<p>The Law addresses ownership, acquisition and compensations. This law amended Law 2 the Year 1953. The law stipulates all the regulations and procedures related to the acquisition of private land for public interest projects. It defines the meaning of public interest projects and presents the entitlement requirements including land registries and ownership documents needed to prove the affected person entitled to compensation. It also regulates the cases where disputes over ownership may occur.</p>
Land Expropriation Law 2/1953	<p>According to Law No.24 of year 1943 modified by Law No. 2 of the year 1953 on "Land Expropriation for Public Projects" and its articles (3) and (21), the Government can expropriate up to 25% of any privately-owned land for public interest reasons -without compensating the owners for the value of the land being expropriated. Exceptions are</p>

	made to owners who prove to be largely damaged by this land expropriation. However, owners are entitled to compensation for all crops and trees, buildings and fixed structures on the expropriated 25% area of the land. In case an entire plot of land is required, the promoter has to submit an official request to the Secretariat of the council of ministers with land limits, coordinates and lot numbers. A dedicated evaluation inter-ministerial committee will assess the land value and will submit the evaluation results report to the secretariat of the council of ministers for approval. A presidential decree is issued accordingly and the budget for compensation is made available at the ministry of finance. No one (owner or user) can financially benefit from the acquired land after the date of the presidential decree (cut out date).
Palestinian Grievance bylaw and the complaints system Decree No.8 of 2016	The resolution of the Palestinian Cabinet No. 8 of 2016 on the Regulation of Complaints has been adopted by the PA and defined the acting body in the government to deal with complaints. This regulation sets out the procedure by which public complaints shall be handled and resolved and states the policies for the improvement of the performance of the Palestinian Ministries and Authorities. Project Affected People/Parties (PAP) have the right to complain to any ministry or authority on environmental or social issues.
Jordanian Heritage law No. 51	The law for the year 1966 manages case of accidental findings of any antiquities or PCRs, as well Tangible Cultural Heritage Law 2018
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.
Occupational Health and Safety (OHS) legislations	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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.
Hazardous waste management bylaw No.6 of 2021	The decree sets the basis for the management and treatment of hazardous waste; it imposes licensing and environmental approval procedures for hazardous waste management facilities and activities. The decree sets forward the storage, segregation,

	and treatment requirements for hazardous waste. The decree additionally defines the requirements for the transportation of hazardous waste, and in line with the Basel Convention, prohibits the export or import of hazardous waste without obtaining the proper permits under specified conditions.
Decision No.16 of 2023 regarding construction and demolition waste	Regulation No. 16 of 2023 on the Management of Construction and Demolition Waste sets a comprehensive legal framework for managing such waste across Palestine. It applies to all construction or demolition activities within or near local government jurisdictions, requiring prior permits and a detailed waste management plan. The regulation mandates designated locations for waste collection, sorting, recycling, and final disposal, with specific environmental and safety criteria for each. It imposes responsibilities on project executors to prevent pollution, ensure worker safety, use appropriate transport methods, and pay a refundable security deposit. It prohibits unauthorized disposal or import/export of waste and allows municipalities to partner with licensed third parties for service provision. The regulation includes penalties for violations, cost recovery mechanisms, and obligations to maintain detailed records for 20 years.
3.1.7. Cabinet Decision No. 16 of 2013 regarding connecting residences and facilities to the public sewer network	This cabinet decision regulates the connection of residential, industrial, commercial, and agricultural entities to the public sewage network. It outlines the responsibilities of service providers (e.g., municipalities) in establishing sewer systems and treatment plants, sets rules for septic tank construction, maintenance, and decommissioning, and specifies licensing and approval processes for wastewater disposal. The decision strictly regulates the discharge of industrial and hazardous wastewater, requiring prior approval and prohibiting certain contaminants such as radioactive or olive press waste. It also addresses treated wastewater reuse, connection fees, penalties, and includes technical annexes specifying permissible wastewater quality standards.
The Palestinian National Solid Waste Management Strategy (2010–2014)	The Palestinian National Solid Waste Management Strategy aims to enhance legislative frameworks, improve organizational structures, and develop technical systems for effective waste management. It emphasizes promoting sustainable practices such as the 3Rs (Reduce, Reuse, Recycle) while addressing urgent issues like random dumping and waste burning. The strategy also focuses on increasing public awareness, strengthening financial mechanisms to support waste management projects, and fostering stakeholder collaboration to ensure an integrated, efficient, and environmentally sound waste management system. These objectives collectively support sustainable development and improved quality of life in Palestine.
Council of Ministers Resolution No. 9 of 2012 on the system of agricultural pesticides	This Regulation consisting of 73 articles aims at issuing a strict pesticides management system in the Palestinian Authority territory setting rules on pesticides in terms of import, export, and registration processes
Gender Based Violence (GBV) including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)	The Palestinian Authority has developed the “National Referral System” for GBV-related grievances in 2013 that was repealed and replaced by the National Referral System for Women Survivors of GBV No. 28 of 2022. The Referral system establishes a unified, multi-sectoral framework for identifying, responding to, and protecting women exposed to gender-based violence. The regulation outlines roles and responsibilities for key actors including the Ministry of Social Development (MoSD), Ministry of Health (MoH), Family Protection Unit, Public Prosecution, police, judiciary, and civil society. It ensures survivor-centered services through ethical principles, confidentiality, risk assessment, immediate response, and ongoing case management via structured case conferences. It mandates coordination among health, social, legal, and protection sectors, and includes provisions for emergency shelter, psychosocial support, legal aid, and reintegration planning.
Civil Defense Law No. 3 of 1998	The law establishes the framework for civil defense operations in Palestine, outlining responsibilities, organizational structure, and emergency response measures. It defines

civil defense as a set of essential actions aimed at protecting civilians, infrastructure, and public services from threats such as natural disasters, fires, and wartime dangers.
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II. National Environmental and Social Assessment and Permitting

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) conserve biodiversity and landscape, and promote the sustainable use of natural resources, (iv) avoid irreversible environmental damage, and minimize reversible environmental damage from development activities.

Typically, there are three types of EA documents that represent the life cycle of the EA review process. These include (1) Environmental Approval Application (2) Initial Environmental Evaluation (IEE), and (3) Environmental Impact Assessment (EIA).

The EQA shall provide guidance on the content and preparation of the EA reports. The Initial Environmental Evaluation (IEE) is for projects where significant environmental impacts are uncertain, or where compliance with environmental regulations must be ensured; whereas an Environmental Impact Assessment (EIA) is required for projects, which are likely to have significant environmental impacts. An EIA may be carried out as a result of an IEE. The screening process determines whether the project is likely to:

- I- Use a natural resource in a way that pre-empts other uses of that resource;
- II- Displace people or communities;
- III- Be in or near environmentally sensitive areas; such as natural reserves, wetlands, or registered archeological and cultural sites;
- IV- Generate unacceptable levels of environmental impact;
- V- Create a state of public concern; or
- VI- Require further development activities that may cause significant environmental impacts.

If a project that triggers the above criteria then it is considered of high risk and requires detailed EIA to be submitted to EQA to review in order to verify if the project can be approved as per national requirements. Per the PEAP, an environmental permit application is screening by EQA, where if it requires Environmental Assessment, an IEE or EIA could be required. The EIA is to define the environmental and social impacts of the project and the measures to mitigate the adverse impacts or capture potential environmental benefits. If an EIA or IEE are not required, EQA will determine, in coordination with the relevant permitting authorities or the EA Committee, whether or not Environmental Approval will be granted and, if so, under what conditions.

Without limiting its content, an EA may specify:

- Required measures to mitigate adverse environmental impacts or capture potential environmental benefits, including a compliance schedule,
- Measures that the proponent must implement in order to comply with relevant standards and requirements; and
- Monitoring and reporting duties of the proponent.

In comparison with the World Bank's ESF and its ESSs, the EQA environmental assessment requirements are similar to ESS1: "Assessment and Management of environmental and social Risks and Impacts". More

specifically, EQA in its guideline for the preparation of environmental assessment studies recommends a similar classification of projects into three categories A, B, and C, similar to the older Operational Policy 4.01 (O.P 4.01). While this categorization is not an official one per the PEAP, it is considered in the guideline issued for the preparation of EA Studies¹. Projects that are classified under category A require a full EA. Projects that are classified under category B usually require an Initial Environmental Evaluation (IEE). As the classification is not officially accredited by EQA and is used as a guideline in the preparation of EA for projects.

Similar to ESS1, Environmental Auditing (EA) may be required by EQA. Its aim is to mitigate negative environmental impacts by evaluating their environmental management and performance. EA is prepared by the owner or operator of the development activity and focuses on mitigation measures for existing environmental impacts to comply with relevant environmental standards and regulations. Decisions resulting from an EA report can include:

- Suspension of the permit for the development activity by the permitting authority until specified measures are implemented;
- Agreement on conditions that will be applied to the development activity, including a plan of implementation.

The PEAP also states that stakeholder consultation is mandatory when undertaking an EIA, which is unlike the World Bank's ESS10 which requires continuous consultations throughout the life cycle of the project despite the instrument used. In consultation with the proponent and the environmental assessment Committee, EQA determines the minimum requirements for stakeholder consultation.

III. World Bank Standards and Key Gaps with the National Framework

The project will follow the World Bank Environmental and Social Standards (ESSs), as well as the World Bank Group Environmental, Health and Safety Guidelines. Based on these policies, the environmental and social risk of the project is categorized as Substantial. The project has been assigned a moderate environmental risk category due to several identified risks, including occupational health and safety (OHS) risks related to the type of activities workers will be engaged in. There are also pollution risks from construction activities, such as air, soil, and water pollution, along with the generation of both non-hazardous and hazardous waste, including dust and the disposal of fertilizers and pesticides. Additionally, there is a low risk of finding unexploded ordnances (UXO) in areas affected by military activities in the Northern West Bank, which could pose OHS and pollution risks. The project also faces a limited risk of food safety issues, as well as potential pollution and OHS risks related to the operation of procured testing and inspection equipment, and the generation of end-of-life e-waste associated with supplying IT equipment. However, these risks are localized and can be managed effectively with proper mitigation measures. Institutional arrangements for the project include the MDLF and NDC, both of which have prior experience in implementing ESF requirements. The project has been assigned a substantial social risk rating due to identified risks including small-scale land acquisition, temporary land use restrictions, labor management risks (e.g., OHS, working terms and conditions, minimum age, and lack of effective and accessible workers' GM and female workers being subjected to SEA/SH), community health and safety concerns (such as SEA/SH and data privacy), potential social exclusion of vulnerable groups (e.g., women and persons with disabilities) and/or lack of meaningful engagement during implementation with women and marginalized groups (e.g. persons with disabilities, women headed households, youth, the poor, people living in Area C, communities in Access Restricted Areas (ARAs) and relatively rural/remote locations, and the limited capacity of the implementing agencies such as MoPIC and the beneficiary partners such as the LGUs and the NGOs in implementing the Bank's ESF and the wide geographical scope of the activity. These risks will be mitigated through targeted measures, including a Land Acquisition and

Livelihood Framework (LALF), enhanced labor management, and a comprehensive Stakeholder Engagement Plan (SEP). The Key gaps between the Palestinian laws Objective and the World Bank relevant ESSs are summarized in below table:

Table 13: Key gaps between the Palestinian laws Objective and the World Bank relevant ESSs

ESF	National Laws and Requirements	Gaps	Gap Filling Measures
ESS1: Assessment and Management of Environmental and Social Risks and Impacts			
Identify, assess, evaluate, and manage environment and social risks and impacts.	<p>Environment Act No 7, 1999 aims to protect the environment from all different forms of pollution, inserts environmental protection grounds in the economical & social developmental plans, conserves the biodiversity, protects the environmentally sensitive areas and improves the environmentally damaged areas.</p> <p>Chapter 3 of the Environment Act No 7, 1999 relates to the EIA; section 1 identifies the subjected projects under the EIA studies, section 2 sets out the nature of licenses and permissions on the projects that may affect the environment, section 3 lays out the inspections and the administrative procedures regarding the facilities and the projects.</p> <p>PEAP of 2000 includes the environmental assessment for investment projects and includes three types of EA documents that represent the life cycle of the EA review process. These include: (1) Environmental Approval Application (2) Initial Environmental Evaluation (IEE), and (3) Environmental Impact Assessment (EIA). The only social aspect included is the consultation with stakeholders.</p>	<p>No significant gaps between Performance Standard 1 and the national laws. It is however noted that the Palestinian Laws focus more on environmental protection and does not cover social aspects thoroughly as does ESS1.</p>	<p>The project will utilize the screening procedures as defined in Annex 1. Based on the screening result, the appropriate E&S assessment methods and tools will be selected (e.g., ESMs, ESMP checklist, ES measures)</p>
<p>To adopt a mitigation hierarchy approach to:</p> <ol style="list-style-type: none"> 1. Anticipate and avoid risks and impacts; 2. Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; 3. Once risks and impacts have been minimized or reduced, mitigate; 	<p>Environment Act No 7, 1999 aims to protect the environment from all different forms of pollution, inserts environmental protection grounds in the economical & social developmental plans, conserves the biodiversity, protects the environmentally sensitive areas as well as improves the environmentally damaged areas.</p> <p>PEAP of 2000 includes requirements for environmental management and different tools to assess and measure the impacts of risks associated with projects. The PEAP requires proponents to identify associated potential risks, study alternatives, and</p>	<p>No significant gaps between ESS1 and the various national laws.</p>	-

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4. and Where significant Residual impacts remain, compensate for or offset them, where technically and financially feasible.	propose mitigation measures relevant to the magnitude of the identified risks.		
To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable.	No specific provisions in the National laws exist in this context. The PEAP 2000 states that one of the objectives of the EA process is to ensure that communities are not resettled from their land and to ensure adequate mitigation measures in this regard.	This is a gap between ESS1 and the national laws.	The project will utilize the ESMF's mitigation measures.
To utilize national environmental and social institutions, systems, laws, Regulations and procedures in the assessment, development and implementation of projects, whenever appropriate.	There are many Palestinian institutions, regulations, and laws that support the environmental protection and the sustainable development as well as to the international environmental conventions that are adopted. National sector specific laws are adhered to in investment projects (e.g., law of Agriculture, Public Health, Hazardous Waste Management System, etc.). In terms of the assessment of projects, this, as identified above, will reflect both the ESS1 requirements which have been reflected in the ESMF. The requirements of ESS1 are considered more stringent in terms of the ESA, especially the social aspects, but does not contradict the PEAP and national laws.	National systems have to be analysed on a sectoral basis (e.g., medical waste management system vs. World Bank ESS3 and EHSs). In general, national systems and laws cover the topics included within the ESSs.	The ESMF assessed laws in reference to the ESSs and further assessment of sectorial laws and regulations to be included in the site-specific E&S management methods and tools.
To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.	The Palestinian Environmental Law includes as one of its main objectives: "Encouragement of Collection and Publication of Environment related Information to Raise Awareness of Environmental Problems". Article 4 of the law includes the duties of EQA to work on environmental education through schools, universities, institutions and others and to encourage individual initiatives. The law itself along with the PEAP and other applicable laws collectively aim to improve sustainability of projects and minimize environmental and social impacts. Nevertheless, these laws focus more on environmental protection.	Palestinian Environmental Laws and systems do not comprehensively cover social aspects as does ESS1.	Implement the project's ESMF and SEP to ensure that social aspects are well-covered in the project's implementation in line with ESS1, ESS2, ESS4, and ESS10 as well as the World Bank's EHS Guidelines.
ESS2: Labor and Working Conditions			
To promote safety and health at work.	Section 5 of Chapter 1 of the Public Health Act No 20, 2004 states Occupational Health. Article 34 of this section identifies the health	There is no major gap between the requirements of ESS2 and the national law. In many places, ESS2	Apply OHS mitigation measures in the ESMF in

	<p>conditions to be met by workers in their occupations, trades, and industries that may affect their health; it also identifies the initial & preventive tests that are vital for workers in their occupations, trades, and industries.</p> <p>Chapter 5 of the PLL No 7, 2000 lays out the conditions of the work, section 1 of this chapter defines the working hours and leaves;</p> <p>Article 68; the working hours are 45 hours per week,</p> <p>Article 69; daily working hours shall be reduced by at least one hour in hazardous or harmful work to health and night work.</p> <p>Article 70; daily working hours should have a period or more for worker to rest. This should not be more than 1 hour, taking into account that the worker should not work more than 5 hours without a break.</p> <p>Article 90 states mean of personal protection and prevention of workers from work hazards and occupational diseases.</p> <p>Chapter 9 of PLL No 7, 2000 defines the working injuries and states the treatment that should be provided to the injured worker as well as the compensations that should be given.</p> <p>The Minimum Wage Act of 2021 sets the minimum acceptable wages to be paid and sets the values for each interval.</p> <p>The Labor Law and the OHS Acts of MoL guarantee a safe working environment for project workers.</p>	<p>refers to the adherence of national laws in terms of labor and working conditions.</p>	<p>accordance with the national laws and ESS2</p>
<p>To promote the fair treatment, non-discrimination and equal opportunity for project workers.</p>	<p>The PLL No 7, 2000;</p> <ul style="list-style-type: none"> - work is a right for every citizen that can work and it is on the basis of equal opportunity & without any kind of discrimination. - discrimination between men and women is prohibited. <p>The CoC for Public Service states that there shall be no discrimination on the basis of sex, religion, ethnicity, believes or any other socio-economic aspects.</p>	<p>There is no major gap between the requirements of ESS2 and the national law</p>	<p>Apply Palestinian Labor law</p>

<p>To protect project workers, including vulnerable workers such as women, people with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.</p>	<p>The PLL No 7, 2000;</p> <p>Article 2: working is a right for every citizen that can work and it is on the basis of equal opportunity & without any kind of discrimination.</p> <p>Article 13: The employer is obliged to employ a number of qualified disabled workers in work commensurate with their disability at least (5%) of the size of the workforce in the establishment.</p> <p>Article 90: discrimination between men and women is prohibited.</p> <p>Article 93: Children employment before 15 years is prohibited.</p> <p>Article 101: Employment of women is prohibited in the three following cases; dangerous work, additional working hours during pregnancy and the first six months of giving birth, night working hours except the occupations that the ministries council defines.</p> <p>The Employment Act No,2000, the Workman compensation;</p> <p>Article 119: If a worker is temporarily incapacitated and has lost his or her ability to perform his / her temporary work, he / she is entitled to receive 75% of his / her daily wage up to a maximum of 180 days.</p> <p>Article 120: The amount of monetary compensation in the case of permanent total disability or death with 3500 working days or 80% of his basic wage until he reaches the age of sixty, whichever is higher.</p> <p>In terms of the Act, Workman is any person who performs work for the employer for a wage and is in the course of his work under his administration and supervision.</p>	<p>No significant gaps between ESS2 requirement and the various national laws</p>	<p>Apply ESMF labor management measures for child and forced labor in accordance with the national laws and ESS2</p>
<p>To prevent the use of all forms of forced labor and child labor.</p>	<p>The Employment Act No 7, 2000;</p> <p>Article 93: Children employment before 15 years is prohibited.</p> <p>Article 95: juvenile must not work at; industries hazardous or harmful to health, night work, official or religious holidays or public holidays, additional working hours, and remote, distant places.</p>	<p>No significant gaps between ESS 2 requirement and the various national laws</p>	<p>Apply ESMF labor management measures for child and forced labor in accordance with the national laws and ESS2</p>

	<p>Article 13 of the Palestinian constitution; No one shall be subjected to any coercion or torture.</p> <p>The Palestinian Child Act No 7, 2004;</p> <p>Article 14: Children employment before 15 years is prohibited.</p>		
To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.	<p>The PLL No 7, 2000:</p> <p>In accordance with the provisions of the law, workers and employers have the right to form trade union organizations on a professional basis in order to protect their interests and defend their rights.</p> <p>General Federation of Palestinian Workers' Union:</p> <p>It organizes the labors based on professional grounds, it improves the labor conditions, follows up the labor demand issues, and defends the workers in case of labor disputes.</p>	No significant gaps between ESS 2 requirement and the various national laws.	Apply Palestinian Labor law
To provide project workers with accessible means to raise workplace concerns.	<p>The resolution of the Palestinian Cabinet No. 8 of 2016 on the Regulation of Complaints has been adopted by the PA and defined the acting body in the government to deal with complaints.</p> <p>However, project-level worker GMs are not covered in the law.</p> <p>Additionally, Governmental GM does not grant anonymity and does not have specific referral channels for GBV (SEA / SH) grievances.</p>	The lack of requirement for a Workers' GM in development projects is a significant gap between national laws and ESS2.	Apply Palestinian Labor law .
ESS3: Resource efficiency and Pollution Prevention and Management			
To promote the sustainable use of resources, including energy, water and raw materials.	<p>Environment Act No 7, 1999 aims to protect the environment from all different forms of pollution, inserts environmental protection grounds in the economical & social developmental plans, conserves the biodiversity, protects the environmentally sensitive areas and also improves the environmentally damaged areas.</p> <p>Chapter 2 of the Environment Act No 7, 1999 presents the protection of all types of the environment including air, water, ground... and sets out plans, procedures, limits, conditions, and standards to prevent any</p>	While the national laws and legislations provide the overall requirement for adherence, they do not specifically contain implementation arrangements of these measures, their monitoring or specific penalties.	All the sub-projects will be assessed in accordance to ESS3 where resources efficiency and pollution prevention measures will be addressed under the ES Instruments and tools.

	<p>deterioration or harm that may be caused to the environment.</p> <p>The PEAP 2000 requires that development projects are assessed based on their use of resources, ensuring that they do not affect their availability and their sustainable use.</p>		
<p>To avoid or minimize adverse impacts on human health and the environment by Avoiding or minimizing pollution from project activities.</p>	<p>Environment Act No 7, 1999 aims to protect the environment from all different forms of pollution, inserts environmental protection grounds in the economical & social developmental plans, conserves the biodiversity, protects the environmentally sensitive areas and improves the environmentally damaged areas.</p> <p>Chapter 3 of the Environment Act No 7, 1999 relates to the EIA, section 1 identifies the subjected projects under the EIA studies, section 2 sets out the nature of licenses and permissions on the projects that may affect the environment, section 3 lays out the inspections and the administrative procedures regarding the facilities and the projects.</p> <p>Chapter 4 of the Environment Act No 7, 1999 puts penalties for anyone or any project that violates the articles regarding the protection of the environment.</p> <p>Article 76 of the Environment Act No 7, 1999 "Pay compensation" states that any person who has caused any environmental damage as a result of an act or negligence contrary to the provisions of this law or any international agreement to which Palestine is a party in is obliged to pay the appropriate damages in addition to the criminal responsibility stipulated in this law.</p> <p>Other Industry Specific Management Systems such as Hazardous waste and Medical Waste Management System. These provide industry specific measures and requirements for ensuring avoidance, and where not possible minimization and mitigation of pollution.</p>	<p>While some systems such as the hazardous waste and medical waste management plans are nationally formulated, their enforcement and implementation are facing issues on the ground. Other aspects such as E-waste are not properly addressed in the laws and legislations.</p>	<p>Apply projects' ESMF guidelines for the preparation of site-specific mitigation measures and monitoring frequencies required in addition to reporting and inspections.</p>
<p>To avoid or minimize project-related emissions of short and long-lived climate pollutants.</p>	<p>Section 2 of Chapter 2 of the Environment Act No 7, 1999, it describes all the regulations that are related to the atmosphere, it determines the air pollutant ratios, it restricts using any equipment that may produce a non-standard exhaust.</p>	<p>No significant gaps between ESS3 requirement and the various national laws. However, ESS3 provides tangible measures on project related emissions and covers climate pollutants, it refers to EHSs with precise requirements, thresholds and</p>	<p>Implement and include the guidelines in the EHSs (both general and industry-specific) in the E&S management tools to be developed for subprojects.</p>

	<p>Article 24 of the Environment Act No 7, 1999 talks about reducing the depletion of the ozone layer in accordance to the international treaties which Palestine is signed on.</p> <p>As of Date, EQA has published a Call for Expression of Interest to prepare the first Draft on Environment, Climate Change, and Sustainable Development Law. This should assist the PA in developing legislations that are relevant to the current environmental status as the PEL of 1999 has not been revised since its inception.</p>	<p>measures relevant to subprojects. National laws only provide generic frameworks of implementation.</p>	
<p>To avoid or minimize generation of hazardous and non-hazardous waste.</p>	<p>Article 7 of the Environment Act No 7, 1999 sets out a plan of solid wastes management plan.</p> <p>Article 11 of the Environment Act No 7, 1999 defines a list of the most dangerous wastes.</p> <p>Article 12 of the Environment Act No 7, 1999 restricts the use of dangerous materials by setting out many instructions and regulations.</p> <p>Article 13 of the Environment Act No 7, 1999 bans any dangerous wastes and restricts their access through the Palestinian lands.</p> <p>Hazardous Waste Bylaw</p> <p>Medical Waste Management System</p> <p>No E-waste Specific Legislations have been developed</p>	<p>No significant gaps between ESS 3 requirement and the various national laws in terms of the general objectives and requirements. However, the implementation of measures under national laws is facing issues in enforcement, penalties and monitoring are not typically adhered to.</p>	<p>ESS3 and projects' ESMF provide guidelines for the preparation of site-specific waste management plans and sets the mitigation measures and monitoring frequencies required in addition to reporting and inspections.</p>
<p>To minimize and manage the risks and impacts associated with pesticide use.</p>	<p>Article 14 of the Environment Act No 7, 1999 puts conditions for the use of agricultural chemical materials.</p> <p>Article 15 of the Environment Act No 7, 1999 puts special quantifications of the permitted agricultural chemical material.</p> <p>Palestine has an international convention regarding the pesticides; Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade.</p> <p>Palestinian Agricultural Law sets the responsibility on MoA to provide the permitted pesticides to be used and sets the regulations required for their manufacturing, import, management, storage, and other aspects.</p>	<p>No significant gaps between ESS 3 requirement and the various national laws in terms of legal and generic requirements.</p> <p>ESS3 requires the development and utilization of IPM approaches, and the use of PMP.</p>	<p>Implement the ESMF's instructions on handling and disposal of used fertilizers and pesticides and the template available for PMP.</p>

ESS 4: Community Health and Safety			
To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project lifecycle from both routine and non-routine circumstances	National laws do not have provisions to assess and manage specific risks and impacts to the community arising from Project activities including behaviour of Project workers, response to emergency situations, and Gender Based Violence (GBV) and sexual exploitation and abuse (SEA).	There is gap between ESS 4 requirement and the various national laws	The project will implement the ESMF which includes clear measures relevant to ESS4. Site specific E&S tools will assess and provide mitigation measures for impacts relevant to ESS4.
To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams.	<p>Palestine has international conventions regarding the climate change and the environment: United Nations Framework Convention on Climate Change (UNFCCC) and Stockholm Convention on Persistent Organic Pollutants (POPs).</p> <p>Palestine has developed its National Adaptation Plan (NAP) in 2016 in response to climate change impacts.</p>	There is no enforcement of international agreements. No specific national laws on climate change and the integration of mitigation matters in investment and infrastructure projects.	The Project ESMF includes assessment of each subproject to ensure promoting quality and safety.
To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.	<p>The Traffic Act No 5, 2000 provides for the compliance of all the conditions of the vehicles that should be on the traffic roads as well as the traffic safety procedures.</p> <p>Article 7 of the Environment Act No 7, 1999, sets out a plan of solid wastes management plan.</p> <p>Article 11 of the Environment Act No 7, 1999 defines a list of hazardous waste</p> <p>Article 12 of the Environment Act No 7, 1999 restricts the use of dangerous materials by setting out many instructions and regulations.</p> <p>Article 13 of the Environment Act No 7, 1999 bans any dangerous wastes and restricts their access through the Palestinian lands.</p> <p>Section 5 of Chapter 1 of the Public Health Act No 20, 2004 states Occupational Health. Article 34 of this section identifies the health conditions to be met by workers in the occupations, trades, and industries that may affect their health; it also identifies the initial & preventive tests that are vital for workers in their occupations, trades, and industries.</p> <p>The Hazardous Waste Management System includes the required measures, licensing</p>	There is a gap resulting from the fact that the national laws only provide general guidelines.	The project will implement the ESMF's mitigation measures and will accordingly follow the ESMF in the preparation and implementation of E&S tools.

	procedures, disposal, and penalties for managing hazardous waste.		
To have in place effective Measures to address emergency events.	<p>No specific laws or regulations that take action in emergency events. However, Chapter 9 of PLL No 7, 2000 defines the working injuries and states the treatment that should be provided to the injured worker as well as to the compensations that should be given.</p> <p>Civil Defense Regulations are followed during the licensing procedures especially relevant to L&FS. Their regulations are considered among the most stringent and the license is renewed after an annual inspection.</p>	There is a gap between ESS 4 requirement and the various national laws.	<p>Apply civil defence requirements in relation to L&FS.</p> <p>Adhere to ESS4 requirements, and the World Bank EHS guidelines as guided by the ESMF.</p>
To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected Communities.	National plans do not specifically cover these requirements. However, under the PEAP 2000 impacts on communities' well-being shall be thoroughly assessed and avoided.	There is a gap where there is no coverage for this issue in any national document	The project will implement relevant clauses, particularly under ESS4 and as guided by the ESMF.
ESS 6: Biodiversity conservation and Sustainable Management of Living Natural Resources			
To protect and conserve biodiversity and habitats.	<p>The Environment Act No 7, 1999, article 40 put grounds and standards to protect the national and natural reserves. Article 41 bans any hunt or killing for specific wild and marine animals. Article 42 concerns about the conservation of the biodiversity in Palestine.</p> <p>Natural Resources Act No 1, 1999 which aims to prepare scientific studies as well as the supervision on the natural resources' investment processes.</p> <p>Chapter 2 of the Environment Act No 7, 1999 presents the protection of all types of the environment including air, water, ground, and sets out plans, procedures, limits, conditions, and standards to prevent any deterioration or harm that may happen to the environment.</p>	There are significant gaps between ESS 6 requirements and the various national laws. National laws have variable definitions of habitats and do not include measures to assess impacts on ecosystem services	The project will implement the ESMF's mitigation measures and will accordingly follow the ESMF in the preparation and implementation of site-specific ESMPs / ESMP Checklist.
To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity.	Environment Act No 7, 1999 aims to protect the environment from all different forms of pollution, inserts environmental protection grounds in the economical & social developmental plans, conserves the biodiversity, protects the environmentally sensitive areas and also improves the environmentally damaged areas.	Neither Mitigation hierarchy nor precautionary approach are explicitly mentioned in the EA policy. There are no supporting articles for use of precautionary approach in the EA	The project will implement the ESMF's mitigation measures and will accordingly follow the ESMF in the preparation and implementation of ES tools.

	<p>Chapter 2 of the Environment Act No 7, 1999 presents the protection of all types of the environment including air, water, ground, and sets out plans, procedures, limits, conditions, and standards to prevent any deterioration or harm that may happen on the environment.</p> <p>Chapter 3 of the Environment Act No 7, 1999 relates to the EIA, section 1 identifies the subjected projects under the EIA studies, section 2 sets out the nature of licenses and permissions on the projects that may affect the environment, section 3 lays out the inspections and the administrative procedures regarding the facilities and the projects.</p>		
<p>To promote the sustainable management of living natural resources.</p>	<p>Environment Act No 7, 1999 aims to protect the environment from all different forms of pollution, inserts environmental protection grounds in the economical & social developmental plans, conserves the biodiversity, protects the environmentally sensitive areas and also improves the environmentally damaged areas.</p> <p>There is gap between ESS 6 requirement and the various national laws. The standard has provision for certification for industrial scale</p> <p>Chapter 2 of the Environment Act No 7, 1999 presents the protection of all types of the environment including air, water, ground, and sets out plans, procedures, limits, conditions, and standards to prevent any deterioration or harm that may happen on the environment.</p> <p>Chapter 3 of the Environment Act No 7, 1999 relates to the EIA, section 1 identifies the subjected projects under the EIA studies, section 2 sets out the nature of licenses and permissions on the projects that may affect the environment, section 3 lays out the inspections and the administrative procedures regarding the facilities and the projects.</p> <p>Natural Resources Act No 1, 1999 which aims to prepare scientific studies as well as the supervision on the natural resources' investment processes.</p>	<p>There is gap between ESS 6 requirement and the various national laws.</p> <p>The standard has provision for certification for industrial scale</p>	<p>The project will implement ESMF's measure which includes preparation of biodiversity management measures, and provide guidance on sustainable practices</p>
<p>To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through</p>	<p>Agricultural law – Article 2. Mandate MoA to promote an integrated rural approach for development.</p>	<p>Partially supported.</p> <p>There are no clear linkages in the regulations between promoting</p>	

the adoption of practices that integrate		integrated rural development and the conservation needs.	
ESS 8: Cultural Heritage			
To protect cultural heritage from the adverse impacts of project activities and support its preservation.	Section 5 of Chapter of the Environment Act No 7, 1999 presents the regulations regarding the cultural and historical regions to guarantee their protection. EA policy requires all projects located near or in registered archaeological and cultural sites to be screened.	There is gap between ESS8 requirement and the various national laws. National law does not include similar definitions of intangible and tangible cultural heritage.	Apply ESS8 requirements
To address cultural heritage as an integral aspect of sustainable development.	Section 5 of Chapter of the Environment Act No 7, 1999 presents the regulations regarding the cultural and historical regions to guarantee their protection.	No significant gaps between ESS8 requirement and the various national laws.	Apply national laws and ensure adherence to ESS8 requirements in parallel.
To promote meaningful consultation with stakeholders regarding cultural heritage.	Chapter 3 of the Environment Act No 7, 1999 relates to the EIA which involves public participation and consultation.	There is a gap: only project which requires EIA conduct consultations	Apply ESS8 requirements
To promote the equitable sharing of benefits from the use of cultural heritage.	Palestine does not have requirements specific to equitable benefit sharing from the use of cultural heritage.	There is significant gap between ESS8 requirement and the various national laws.	Apply ESS8 requirements
ESS10: Stakeholder Engagement and Information Disclosure			
To establish a systematic approach to stakeholder engagement that will help borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.	Chapter 3 of the Environment Act No 7, 1999 relates to the EIA which involves stakeholder engagement plan as well as public hearing and consultation. However, no precise systematic approach is clear and is only required during EIA process.	ESS 10 is more stringent in this regard as it provides a categorization of stakeholders, continuous consultations requirements, different techniques and specific measures to involve vulnerable and marginalized groups. Additionally, SEPs result from the application of ESS10 that are used throughout the project life cycle unlike the PEL and PEAP which require consultations only at the planning phase of the project.	Implement the project's SEP.
To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in	Chapter 3 of the Environment Act No 7, 1999 relates to the EIA which involves stakeholder engagement plan as well as public hearing and consultation. The stakeholder engagement	No significant gaps between ESS 10 requirement and the various national laws.	NA

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project design and environmental and social performance.	plan involves the assessment of the interest and powers of each stakeholder.		
To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.	Chapter 3 of the PEL as well as PEAP of 2000 require the engagement of communities that are most likely to be affected by the establishment of projects. However, it does not provide requirements for continuous engagement.	Significant gaps between ESS 10 requirement and the various national laws especially in terms of continuity.	Implement the project's SEP.
To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.	The Environmental Impact Assessment Policy, 1999, article 8 invites to make coordination between all the stakeholders and the participative entities and presents many points to engage all the stakeholders in many stages of the implemented project. However, there is no specific requirement to disclose project information and documents to the public.	ESS10 requires that all instruments and disclosable project documents are available to the public in an accessible and appropriate manner and format, national laws do not cover this aspect and disclosure is not commonly practiced.	Disclosure of information will be implemented as guided by the project's SEP.
To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond to and manage such grievances.	The resolution of the Palestinian Cabinet No. 8 of 2016 on the Regulation of Complaints has been adopted by the PA and defined the acting body in the government to deal with complaints.	The ESS ensures reception and timely response to any complaints made about the Project and is the basis for developing appropriate mitigation strategies, it is inclusive for all projects financed by the World Bank. However, the national system does not provide means for the uptake of anonymous complaints, and does not provide clear pathways for GBV (SEA / SH) complaints submission despite the availability of the National Referral system No. 28 of 2022	Project-level GM will be utilized by implementing agencies respective to each component's implementation arrangements and responsibilities. The GMs shall be in line with the SEP with effective uptake mechanisms as detailed in chapter 11 and further detailed in the SEP.
To establish a systematic approach to stakeholder engagement that will help borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.	The Environmental Impact Assessment Policy, 1999 defines participation of stakeholders in many stages like in the TOR stage, the policy also includes that wider participation in case of projects that may affect the environment, and the methods and the results of the meetings should be documented. However, it does not include requirements for engagement, especially relevant to vulnerable and marginalized groups and does not require the continuous engagement of PAPs or OIPs.	ESS10 is more stringent as it requires projects to have an SEP that is applicable throughout the lifecycle of the project.	Implement the project's SEP.

The World Bank's environmental and social standards applicable to project activities are summarized below.

Table 14: Relevant World Bank ESS and Key Gaps with the National Framework

E&S Standard	Relevance
1. Assessment and Management of Environmental and Social Risks and Impacts	ESS1 is relevant for the project because project activities are expected to pose moderate environmental due to several identified risks, including occupational health and safety (OHS) risks related to the type of activities workers will be engaged in. There are also pollution risks from construction activities, such as air, soil, and water pollution, along with the generation of both non-hazardous and hazardous waste, including dust and the disposal of fertilizers and pesticides. Additionally, there is a low risk of finding unexploded ordnances (UXO) in areas affected by military activities in the Northern West Bank, which could pose OHS and pollution risks. The project also faces a limited risk of food safety issues, as well as potential pollution and OHS risks related to the operation of procured testing and inspection equipment, and the generation of end-of-life e-waste associated with supplying IT equipment. However, these risks are localized and can be managed effectively with proper mitigation measures. Institutional arrangements for the project include the MDLF and NDC, both of which have prior experience in implementing ESF requirements. The project has been assigned a substantial social risk rating due to identified risks including small-scale land acquisition, temporary land use restrictions, labor management risks (e.g., OHS, working terms and conditions, minimum age, and lack of effective and accessible workers' GM and female workers being subjected to SEA/SH), community health and safety concerns (such as SEA/SH and data privacy), potential social exclusion of vulnerable groups (e.g., women and persons with disabilities) and/or lack of meaningful engagement during implementation with women and marginalized groups (e.g. persons with disabilities, women headed households, youth, the poor, people living in Area C, communities in Access Restricted Areas (ARAs) and relatively rural/remote locations, and the limited capacity of the implementing agencies such as MoPIC and the beneficiary partners such as the LGUs and the NGOs in implementing the Bank's ESF and the wide geographical scope of the activity. These risks will be mitigated through targeted measures, including a Land Acquisition and Livelihood Framework (LALF), enhanced labor management, and a comprehensive Stakeholder Engagement Plan (SEP).
2. Labor and Working Conditions	ESS2 is relevant for the project because there are certain labor risks for project workers. Labor-related risks include OHS, exposure to hazardous materials and waste (e.g., potential uncover of UXO, pesticides, child labor and VAC, exclusion of vulnerable and marginalized groups from employment, in addition to female workers being subjected to sexual harassment (SH), and sexual exploitation and abuse (SEA), general labor working conditions, and lack of effective and accessible workers' GM. Large labor camps are not anticipated for the project.
3. Resource Efficiency and Pollution Prevention and Management	ESS3 is relevant due to the pollution risks associated with construction activities, which include the generation of both non-hazardous and hazardous waste, dust release, and a low risk of encountering unexploded ordnances (UXO) in areas affected by military activities in the Northern West Bank. There are also limited pollution risks related to the handling and disposal of used fertilizers and pesticides. Additionally, the operation of procured testing and inspection equipment may result in the generation of hazardous waste, and there is a risk of generating end-of-life e-waste from both testing equipment and IT equipment.

4. Community Health and Safety	ESS4 is relevant pertain to the following potential risks (i) potential exposure of beneficiaries, especially women, girls, and PwD to the risk of SEA/SH during delivery of services and participation in training; (ii) potential or inequitable access of marginalized and vulnerable groups (e.g. persons with disabilities, women headed households, youth, the poor, people living in Area C, communities in Access Restricted Areas (ARAs) and relatively rural/remote locations etc.) from project benefits); (iii) data privacy; (iv) community health and safety risks related to the potential finding of UXO, and (v) food safety and hygiene risks for agricultural and food production supported women and/or PwD establishments
5. Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	ESS5 is relevant, there may be potential risks associated with some small-scale private land taking for the expansion of ROW, if required, for rehabilitation and maintenance of water networks and construction and rehabilitation of roads and pavements. There is also a potential risk of temporary restriction to land use and consequent negative impacts during construction on small enterprises (e.g. shops, kiosks) particularly in commercial areas. Similarly, while activities including construction and rehabilitation of public facilities (e.g. classrooms, health clinics, playgrounds, sport courts, parks, waiting stations, retaining walls, and other LGU's facilities including solid waste facilities and offices public centers, etc.) are generally implemented on public land, some private land taking may be needed in cases where public land is not available.
6. Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS6 is relevant, due to potential risks of impacting biodiversity and natural habitats from activities involving the infrastructure works or the agricultural practices, are expected to be limited and insignificant.
8. Cultural Heritage	ESS is Relevant The project is not expected to impact tangible or intangible cultural heritage, as activities are planned within cities and villages' masterplans that identify the locations of physical cultural resources designated by the Ministry of Antiquities and Tourism. However, these master plans do not account for uncovered resources or intangible cultural heritage. Given the historic nature of the West Bank, there remains a low likelihood of encountering cultural heritage during excavation or construction. 8 is relevant
10. Stakeholder Engagement and Information Disclosure	ESS10 is relevant for all projects given the need to engage with beneficiaries and stakeholders on development activities that affect their lives. The project will affect various groups through labor-intensive subprojects and service delivery, making transparency, consultation, and grievance redress critical. A Stakeholder Engagement Plan (SEP) has been prepared to ensure timely dissemination of information, two-way communication, and mechanisms for addressing concerns throughout the project lifecycle.

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