

**The Palestine Liberation Organization (for the benefit of The
Palestinian Authority)**

**GAZA EMERGENCY SUPPORT FOR SOCIAL
SERVICES (P177897)**

**ENVIRONMENTAL and SOCIAL COMMITMENT PLAN
(ESCP)**

30 March 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Palestinian Liberation Organization (for the benefit of the Palestinian Authority (PA) (hereinafter “the Recipient”) will implement the Gaza Emergency Support for Social Services (the Project) with the involvement of the NGO Development Center (NDC) as the Implementing Agency as set out in the Grant Agreement. The International Development Association (hereinafter the Bank) has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the Recipient. The Recipient will promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		Time Frame	Responsibility Entity/Authority
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social and health and safety (ESHS), performance of the Project indicating the state of compliance with the measures presented in the ESCP, including but not limited to the SIA, LMP, the SEP, stakeholder engagement activities, and the functioning of the grievance mechanism.</p>	<ul style="list-style-type: none"> • First monitoring report after three months of project Effective Date. Subsequent E&S monitoring reports will be submitted as part of the semiannual overall project progress reports and the quarterly spot audit reports, throughout the project implementation. • Reporting back to stakeholders shall be carried out according to the frequency prescribed in the SEP. 	NDC
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public, or project workers. Such incidents include significant environmental contamination, road traffic related incidents and accidents during the project activities, and incidents of Sexual Exploitation and Abuse or Sexual Harassment (SEA/SH). Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a Root Cause Analysis (RCA) report on the incident or accident and propose any measures to prevent its recurrence in a Corrective Action Plan (CAP) The CAP shall be implemented, as required, throughout the project and monitoring reports of CAP implementation will be submitted to the Bank.</p>	<ul style="list-style-type: none"> • Notify of any incident or accident within 24 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within 48 hours following the initial notification, as acceptable to the Bank. • Incident/accident Notification and reporting system to be maintained throughout the project implementation. • RCA shall be submitted no later than 10 days after the initial notification, unless otherwise agreed to with the Bank. <p>Reporting on CAP implementation will be included in the E&S monitoring reports submitted as part of the semiannual overall project progress reports and the quarterly spot audit reports, throughout the project implementation.</p>	NDC

MATERIAL MEASURES AND ACTIONS	Time Frame	Responsibility Entity/Authority
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE:</p> <p>a. The Recipient through NDC shall establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks and impacts. NDC has appointed an Environmental and Social Officer (ESO) and this position will be maintained during the project implementation. The ESO will oversee the implementation of the E&S requirements as established in the ESF instruments and monitor and ensure partner NGOs' compliance with the E&S requirements. Commitment to enhance the E&S capacity of the ESO is included under Section CS1 of this ESCP that pertains to capacity support (training).</p> <p>b. The Recipient through NDC shall ensure that NGOs receiving sub-grants (partner NGOs) appoint E&S Focal Persons in their organizations to ensure proper implementation of the E&S requirements of the activities being implemented under the grants.</p>	<p>a. The ESO was appointed in February 2022 and thereafter maintain this position throughout project implementation.</p> <p>b. E&S Focal Persons shall be appointed prior to the receipt of the sub-grants by the respective NGOs and maintained during the sub-grant implementation.</p>	<p>NDC</p> <p>NDC/Partner NGOs</p>

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<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ MANAGEMENT OF CONTRACTORS</p> <p>a. Prepare, consult, and disclose the project Social Impact Assessment (SIA).</p> <p>b. Assess the E&S risks and impacts of proposed project activities in accordance with the SIA, the environmental and social standards, the Health and Safety Guidelines (HSGs), relevant WHO guidelines for COVID-19, in a manner acceptable to the Bank.</p> <p>c. Incorporate the relevant aspects of the ESCP, including the relevant E&S measures, documents and/or plans, and the LMP, into the ESHS specifications of the grant agreement documents with partner NGOs, including relevant WHO guidelines for Covid-19 and all measures intended to prevent GBV and SEA/ SH incidents. Incorporate these also in the Project Operational Manual (POM), that will be prepared prior to the Project Effective Date, and any other relevant technical specifications or standard operating procedures (SOPs) prepared for the project. Thereafter ensure that the partner NGOs comply with the ESHS specifications of their respective contracts, and any other relevant technical specifications or SOPs prepared for the project.</p>	<p>a. The SIA shall be prepared, consulted, cleared and disclosed by the project Effective Date and implemented thereafter throughout the Project.</p> <p>b. Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>c. Prior to the preparation of grant agreement documents and throughout the project implantation</p>	<p>NDC</p>
<p>ESS 2: LABOR AND WORKING CONDITIONS</p>		

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<p>2.1 LABOR MANAGEMENT</p> <p>LABOR MANAGEMENT PROCEDURES</p> <p>a. The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing adequate occupational health and safety (OHS) measures (including personal protective equipment and emergency preparedness and response measures) adequate measures for the prevention of child labor, GBV, SEA/SH, setting out grievance arrangements for Project workers including SEA/SH complaints, and incorporating labor requirements including OHS into the ESHS specifications of the agreement documents and contracts with partner NGOs.</p> <p>b. The NDC shall prepare, disclose, and implement Labor Management Procedures (LMP) consistent with ESS2 and national law.</p> <p>c. Develop, adopt, and Implement workers' code of conduct (CoC) for all Project workers as part of the LMP. Ensure workers sign and understand the code of conduct at the time of employment /engagement in the Project. Requirement for the LMP will be incorporated into the agreement documents of partner NGOs. Partner NGOs shall be monitored to ensure compliance with LMP provisions in their respective grant agreements.</p>	<p>a. All actions under ESS2 shall be implemented throughout Project implementation</p> <p>b. Preliminary LMP has been prepared, cleared and disclosed in-country on March 1, 2022. The preliminary LMP will be updated, cleared and disclosed by the Effective Date and before carrying out of relevant project activities.</p> <p>c. Labor management measures concerning partner NGOs, also including CoC for workers, shall be adopted before launching the Project activities and implemented thereafter throughout the relevant Project activities.</p>	<p>NDC/Partner NGOs</p> <p>NDC</p> <p>NDC/Partner NGOs</p>

MATERIAL MEASURES AND ACTIONS		Time Frame	Responsibility Entity/Authority
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2, and maintained and operated for the Project, in a manner acceptable to the Bank. The GM shall receive grievances from all Project workers including grievances relating to compensation, discrimination, OHS concerns, GBV/SEA/SH, and any others as described in the LMP.</p>	<ul style="list-style-type: none"> The Recipient through NDC shall establish and implement a GM for their project workers within one month of the Effective Date and prior to the carrying out of relevant project activities and maintained throughout project implementation. Partner NGOs will develop and implement a grievance mechanism for their workers prior to the start of any activities. 	<p>NDC</p> <p>Partner NGOs/NDC</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES:</p> <p>Adapt and implement the Occupational Health and Safety (OHS) measures in line with the LMP, Ministry of Health and WHO guidelines on COVID-19. The OHS measures will address: (a) hazards to project workers; (b) preventive and protective measures; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements to emergency situations; and (f) remedies for adverse impacts such as occupational injuries, deaths, disability and disease.</p>	<p>All measures shall be implemented throughout the Project implementation period.</p>	<p>NDC/Partner NGOs</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	NOT APPLICABLE		
ESS 4: COMMUNITY HEALTH AND SAFETY			

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4.1	<p>COMMUNITY HEALTH and SAFETY:</p> <p>Adopt and implement measures and guidelines, included in the SIA, to minimize community health and safety risks including those related to, but not limited to, exposure to COVID-19 and other communicable diseases. Adopt provisions to ensure fire safety in buildings and facilities used during trainings and delivery of project related services proportionate to the risks.</p>	Prior to the carrying out of the relevant project activities and throughout project implementation	NDC/Partner NGOs
4.2	<p>GBV and SEA RISKS:</p> <p>Adopt and implement measures to assess and manage GBV/SEA/SH risks in line with the project SIA</p>	Prior to the carrying out of the relevant project activities and throughout project implementation.	NDC/Partner NGOs
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	NOT APPLICABLE		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	NOT APPLICABLE		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	NOT APPLICABLE		
ESS 8: CULTURAL HERITAGE:			
	NOT APPLICABLE		
ESS 9: FINANCIAL INTERMEDIARIES			
	NOT APPLICABLE		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		Time Frame	Responsibility Entity/Authority
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN:</p> <p>Prepare, consult, disclose, and implement a Stakeholder Engagement Plan (SEP) consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	<p>The SEP has been prepared, reviewed and cleared by the Bank, and disclosed in-country on 02 March 2022. The SEP shall be implemented throughout project implementation.</p>	<p>NDC/Partner NGOs</p>
10.2	<p>GRIEVANCE MECHANISM:</p> <p>Prepare, operate and maintain a grievance mechanism, as described in the SEP. The grievance mechanism will ensure reception and timely response to any complaints made about the project. Adequate resources shall be provided for the operation of the GM. The GM shall also receive, register, and address concerns and grievances related to GBV/SEA/SH in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers.</p>	<p>GM will be established within one month of the Effective Date and maintained throughout the project Implementation.</p>	<p>NDC/Partner NGOs</p>

MATERIAL MEASURES AND ACTIONS		Time Frame	Responsibility Entity/Authority
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Provide training to NDC ESO and relevant staff, and the E&S Focal Persons in the partner NGOs on (not limited to):</p> <ol style="list-style-type: none"> 1. Management of E&S issues (implementation, monitoring, reporting etc.) in accordance with the projects ESF instruments, E&S guidelines and other relevant documentation (e.g. POM, technical guidelines etc.) 2. Stakeholder mapping and engagement and information disclosure 3. Grievance redress 4. Labor management requirements 5. Gender, GBV and social inclusion issues (e.g. regarding vulnerable groups including persons with disabilities, elderly, children etc.) 6. Prevention and response to potential cases of GBV/SEA/SH and application of Codes of Conduct 7. Measures to minimize exposure to COVID-19 and other health and safety measures 8. Occupational health and safety for project workers 	<p>Prior to the implementation of project activities and no later than 3 months after the Effective Date. Capacity building will be conducted as required throughout project implementation</p>	<ul style="list-style-type: none"> • NDC (trainings for ESO and relevant NDC staff) • ESO-NDC (trainings for relevant NDC staff and E&S Focal Persons in partner NGOs) • World Bank E&S Team (trainings for NDC and E&S Focal Persons in partner NGOs)