



مسار فلسطين التراثي  
Palestinian Heritage Trail

# **Palestinian Heritage Trail; the Project Implementation Agency (PIA)**

ENVIRONMENTAL & SOCIAL MANAGEMENT FRAMEWORK (ESMF)

FOR

Increased Economic Opportunities and Improved Livelihood for Fragile  
Communities along the Palestinian Heritage Trail (PH Trail) in the West  
Bank (P170706)

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**ACRONYMS**

CAE	Child Abuse/Exploitation
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EMCA	Environmental Management Act - 1996
EQA	Environmental Quality Authority
ERP	Emergency Response Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESO	Environmental and Social Officer
ESSF	Environmental and Social Screening Form
ESSs	Environmental and Social Standards
ESS2	Environmental and Social Standard 2
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GoP	Government of Palestine
GRM	Grievance Redress Mechanism
IEE	Initial Environmental Evaluation
JSDF	Japan Social Development Fund
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MoA	Ministry of Agriculture
MoH	Ministry of Health
LGUs	Local Government Units
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PA	Palestinian Authority
PEL	Palestinian Environmental Law
PDO	Project Development Objectives
PEAP	Palestinian Environmental Assessment Policy
PHT	Palestinian Heritage Trail; the PIA
PH Trail	Palestinian Heritage Trail; the Project
PIA	Project Implementing Agency
PNA	Palestinian National Authority
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SHE	Safety, Health & Environment
SMEs	Small and Medium Enterprises

## EXECUTIVE SUMMARY

### Objectives of the Environmental and Social Management Framework

1. The Environmental and Social Management Framework (ESMF) is prepared to provide an effective environmental and social screening process for sub-projects in the Increased Economic Opportunities and Improved Livelihood for Fragile Communities along the Palestinian Heritage Trail (PH Trail), hereinafter (the Project), in the West Bank. Specifically, the following are the objectives of the ESMF:

- To guide the Project activity to comply with the national regulations and the World Bank's Environmental and Social Framework (ESF).
- To ensure that all sub-projects are screened for potential adverse environmental and social impacts and appropriate mitigation and monitoring measures are identified and implemented by environmental and social expert.
- To guide Palestinian Heritage Trail (PHT); the Project Implementation Agency (PIA) to approve the environmental and social screening process as outlined in this Framework, including the implementation and monitoring of mitigation measures of all sub-projects as necessary.

### Legal Framework

2. A number of legislations, policies and instruments are available to support environmental management and the Environmental Assessment process in Palestine. The Palestinian Environmental Law and other sectoral sections in other legislations are the key instruments that cover environmental management in all the sectors of development. The following are the applicable legal and administrative frameworks:

- Palestinian Environmental Assessment Policy (PEAP), resolution No: 27 23/4/2000;
- Palestinian Public Health Law No 20, 2004;
- Palestinian Environmental Law No. 7, 1999;
- Palestinian Labor Law No 7, 2000;
- Grievance and Complaints bylaw; approved by the Ministerial Cabinet on 9/3/2005 and updated on 8/3/2009.

3. However, the national legislation does not include procedures for screening small-scale investments for potential adverse environmental and social impacts. To close this gap between national legislation and the Bank's ESF which requires that all investments proposed for Bank-financing are screened against the 10 Environmental and Social Standards (ESSs) for potential adverse environmental and social impacts and appropriate environmental instruments to be prepared. Based on the screening results, this ESMF is being prepared.

### Project Description

4. The project will use the financing from the Japan Social Development Fund (JSDF) to promote local community development through the implementation of the following three components:

#### **Component I: Community Driven Development;**

5. This first component will include three sub-components. The first activity will finance community-subprojects, including trainings and some goods that will help the communities to strengthen their touristic offer, to grow their businesses and to cater to local and international

tourists/walkers. Specifically, through a community-driven development approach, funding will be dedicated to creating and improving the tourism experiences that communities offer, such as making experiences of olive oil, herbal soap, wine, handcrafts, traditional food, and organic farming, through training and the financing of ad hoc equipment. These experiences would offer tourists the opportunity to see how these items are traditionally made and buy products towards the end of their visit. The project will also support community activities to further support “within community” activities, such as creating inter-community walks, through way-marking and signage, training individuals and communities and promotional campaigns among communities; planting trees and gardening of some areas; improving first aid stops; training the communities on cleaning and respecting the environment, on hygiene and on foreign languages; training youth to become community guides; preparing promotional materials such as maps and booklets; and organizing familiarization trips for tour operators. No new construction will be made, and no removal of trees will take place. Also, a cluster approach, through which the communities will be grouped, will be adopted in the implementation of the activities to strengthen the linkages among communities and their working together.

### **Component II: Project Management and Administration, Monitoring and Evaluation, and Knowledge Dissemination.**

6. This component includes the following 3 sub-components: (i) Project Management and Administration; (ii) Monitoring and Evaluation; and (iii) Knowledge Dissemination.

7. Sub-component 1, Project Management and Administration: PHT will be the implementing agency of the project and this sub-component will cover the costs of a project manager, some consultancies, and the project audits.

8. Sub-component 2, Monitoring and Evaluation: the first activity to be implemented under this second sub-component will be the tracking of project’s results and the achievement of the Project Development Objective (PDO) indicators. This component will finance a Monitoring and Evaluation (M&E) system, and the strengthening of the Palestinian Heritage Trail (PHT) monitoring and evaluation framework.

9. Sub-component 3, Knowledge Dissemination: this last sub-component will finance two dissemination events. One in the field to share project results, lessons learned and project gains, with major stakeholders, representatives of the Japanese government, donors, representatives of the private sector, etc. and the second in Washington DC.

### **Implementing Agency Information**

10. PHT,<sup>1</sup> a local NGO, will be the Project Implementing Agency (PIA) and the grant recipient responsible of the overall project implementation. PHT was created by three following local Palestinian organizations, leaders in the Palestinian adventure tourism: (i) the Palestine Wildlife Society, (ii) the Rozana Association, and (iii) the Palestinian Centre for Rapprochement between People / Siraj Center for Holy Land Studies.

11. Approval of the environmental and social screening and risk assessment, management, and monitoring will be an integral part of the PHT work in the course of the project implementation. PHT shall assign/recruit a full time Monitoring and Evaluation Officer (M&E/ SEO) of which 40% of his time will be allocated for the E&S due diligence. The M&E Officer should be supported by an E&S consultant with ESF experience that should be available on a part-time basis. The M&E Officer and the E&S consultant will be responsible to ensure that beneficiary firms/individuals

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<sup>1</sup> <https://www.phtrail.org/>

comply with subprojects' environmental and social requirements. The PIA will conduct regular on-site monitoring of works during implementation and operation to verify adherence to the requirements set out in the ESMF.

### **Capacity Building for PHT**

12. PHT does not have Safety, Health and Environment (SHE) department or environmental and social expert. Therefore, there is a need to recruit M&E Officer (M&EO) to be included in PHT, the Project Implementation Agency (PIA). The M&EO will be involved in determining and monitoring the E&S requirements of sub-projects. PHT staffs, M&EO and the E&S consultant with ESF experience that should be available on a part-time basis are proposed to undergo training in environmental management impact assessment, implementation of the environmental and social screening process outlined in this ESMF, solid waste management and pollution control and occupational Health and safety (OHS) as part of capacity building. The indicative budget associated with implementing the ESF as well as monitoring of environmental and social risks associated with the project is estimated at 93,600 US\$ as described in section 7.5.

### **Screening Process**

13. The environmental and social screening process described in chapter 4 outlines the screening steps of sub-projects and the institutional responsibilities for the implementation of each step (steps 1-6). All project activities shall be subjected to environmental and social screening and where necessary specific instruments (ESMP checklist or ESMP) shall be prepared before commencement of applicable project activities. Specific mitigation measures will be outlined in the site-specific E&S instrument and implemented, when necessary, for each sub-project.

### **Risk assessment and Potential Impacts of proposed sub-projects**

14. The Project is not likely to cause significant environmental impacts. The environmental risks associated with the project are considered moderate. The potential negative impacts are associated with the cleaning of walks and plantation of trees, organic farming, and purchase and operation of equipment for the wine brewing, traditional food, olive oil making, herbal soap. The environmental risk will involve: (i) occupational health and safety (OHS) risks during the small civil works during the installation and operating equipment (component I), the occurrence OHS incidents has low probability and could be minimized through abiding to tailored OHS measures; (ii) risks associated with increased solid waste generation and use of chemicals in some sub-projects' activities. The potential impacts are generally short-term, temporary and reversible which can be reduced or eliminated by designed and known mitigation measures.

15. The social risks associated with the project are considered moderate. The social risks are limited in nature and scale, and can be summarized as follows: (i) risks related elite capture and social exclusion or inequity in its various forms; (ii) risks related to labor and working conditions for project, direct and contracted workers; (iii) risk of exposure of youth, including vulnerable youth and women to possible GBV, SEA/SH concerns related to increased touristic activities in the project area. The Project will not result in any risks related to involuntary resettlement.

### **Proposed Mitigation Measures**

16. Mitigation measures will be identified for each negative impact identified during the screening process. The Mitigation measures are presented in section 6.3. The mitigation measures will be implemented by beneficiaries with monitoring done by the M&EO and the E&S specialist at PHT.

### **Environmental and Social Management Plan**

17. EAs envisaged for activities under this Project are ESMP Checklist (annex II) and ESMP (annex III). ESMP Checklist template for small civil works that are expected to be the most project related activity is prepared as an integral part of ESMF and available in the Annex II. ESMP Checklist template (containing mitigation measures and monitoring plan) will be adjusted to each individual civil works sub-project envisaged in the Checklist. In addition, it will define supervision and reporting responsibilities and the timeline. ESMP will be produced for all other subprojects and activities that have not been envisaged by the ESMP Checklist but may produce potential negative impacts to the environment or human health.

18. The responsible parties for implementation of mitigation measures and monitoring during implementation and operation will be the Municipalities/beneficiary firms and this will be monitored by the M&EO at PH Trail.

### **Environmental and Social Monitoring and Capacity Building**

19. Environmental monitoring needs to be carried out continuously during implementation and operation of the sub-projects in order to measure the success of the recommended mitigation measures. Monitoring activities will be carried out by M&EO and the E&S consultant with ESF experience that should be available on a part-time basis at PHT. Any changes in monitoring parameters must have the approval of the World Bank Team.

20. PHT staff and specifically the M&EO and the E&S consultant shall receive additional environmental and social specific training. Among the other subjects that the training and capacity building in the project shall cover: an orientation program on ESF, ESMF, LMP, SEP; environmental assessment processes, monitoring and evaluation (M&E); OHS, waste management, and participatory methodologies. Capacity building will help improve the effectiveness of stakeholders' engagement in management of environmental and social impacts during planning, implementation and operation of proposed sub-projects. The capacity building and training shall also invite officers of the Ministry of Tourism and Antiquities (MoTA), interested private sector parties, and stakeholders; an interesting subject for the stakeholders would be the environmental monitoring and reporting.

### **Public Consultations, Grievance and Disclosure**

21. Public consultations are critical in preparing effective and sustainable sub-projects activities. This requirement supports the participatory planning process as required by the World Bank. It is important that beneficiaries are involved in the project cycle, from the screening to implementation and monitoring. The same applies to relevant stakeholders.

22. To fulfill the requirements of ESS10, PHT has prepared Stakeholder Engagement Plan (SEP). The purpose of SEP is to explain how Stakeholder engagement will be practiced throughout the project life cycle and which methods will be used as part of the process; as well as to outline the responsibilities of PH Trail in the implementation of stakeholder engagement activities.

23. For sub-project activities, consultations with Project Affected Parties (PAPs) and Other Interested Parties (OIPs) according to the SEP should be conducted during the screening process, when preparing the subproject ESMP and during implementation. PH Trail will conduct consultation with relevant stakeholders and potential clients applying COVID-19 protocols for public consultations and stakeholder engagement.

24. To facilitate meaningful consultations, PHT shall provide all the relevant material and information



in a timely manner, and in a form and language that are understandable. The location of the relevant documents should be advertised through commonly used media. Depending on the public interest in the potential impacts of the subprojects, a consultation session may be required to better convey concerns.

25. Once the sub-project has been selected based on criteria for developing grant proposals, beneficiary firm/individuals will conduct the screening process in consultations with stakeholders about the results and identify key issues and determine how the concerns of affected or interested individual or group will be addressed in the ESMP checklist/ESMP.

26. PHT will be responsible for implementation of the project Grievance Mechanism (GM). It advises people and stakeholders on their rights and GM process throughout the period of project implementation.

27. PHT will disclose on their websites (<https://phtrail.org/> and [www.paltrails.ps](http://www.paltrails.ps)), project information and all key documentation, including ESMF, ESMP, LMP, SEP to allow stakeholders to understand the risks and impacts of the project, and potential opportunities.

## CHAPTER ONE: INTRODUCTION

### 1.1 Background

28. The objective of this Environmental and Social Management Framework (ESMF) is to ensure that the Project's activities for example the soap and olive making; winery; glass and handcrafts making; organic farming, way-marking and signages; planting trees and gardening of some areas; improving first aid stops; cleaning and respecting the environment; and acquisition of some equipment are designed and implemented in an environmentally and socially sustainable manner, considering Palestinian's legislation as well as the World Bank' Environmental and Social Framework (ESF).

29. The ESMF is developed by Palestinian Heritage Trail (PH Trail) to manage risks under the Increased Economic Opportunities and Improved Livelihood for Fragile Communities along the Palestinian Heritage Trail (PH Trail) in the West Bank called hereafter (the Project). International Bank for Reconstruction and Development/International Development Association called hereinafter (the Association) has agreed to provide financing for the Project. Ministry of Tourism and Antiquities (MOTA) recommended to work with PHT as the grant recipient and project implementing agency (PIA), since they recognize PHT like the naturally responsible organization for the development of the Trail. PHT will be responsible for following up the implementation of the environmental and social considerations and mitigation measures stated in the ESMF.

30. PHT will be responsible through qualified environmental and social expert for completing the Environmental and Social Screening Form prepared in this ESMF, and based on the screening results, appropriate environmental and social mitigation and management plan will be prepared. The screening process has been developed because the locations and types of sub-projects required are not known prior to the appraisal of the Project, and therefore potential adverse localized environmental and social impacts cannot be precisely identified. Furthermore, Palestinian's environmental legislation does not have provisions for the environmental and social screening of small-scale projects, such as cleaning of walks and plantation of trees, organic farming, and purchase of equipment among other activities included in the Project, whereas the World Bank's ESF requires that all projects are screened for potential adverse environmental and social impacts to determine the appropriate mitigation measures.

### 1.2 Level of Environmental and Social Work

31. The appropriate level of environmental and social work could range from the application of simple mitigation measures; to the preparation of updated ESMP Report; to no environmental work being required. The environmental and social screening process is consistent with the World Bank's ESF.

32. It is expected that the project will have limited negative environmental and social impacts. However, potential localized adverse environmental and social impacts that would require proper mitigation might occur. The Environmental and Social Screening Form will enable project implementing agency (PHT) to identify, assess and mitigate potential negative environmental and social impacts; and to ensure proper mitigation.

### **1.3 Coordination with Environmental Quality Authority**

33. It is important during the implementation of the project activities especially that raise environmental and social concerns to coordinate with EQA to ensure that the activities are consistent with the local regulations. This will be achieved by ensuring the involvement of the EQA Regional Environmental Office in the supervision of the project as they will be part of the project steering committee and they will be consulted on environmental impacts/mitigations during implementation of subprojects.

### **1.4 Preparation and Use of this Framework**

34. ESMF approach is selected because the Project consists of series of activities, and the risks and impacts cannot be determined until the sub-project details have been identified. The ESMF provides a guide to be used in accordance with Palestinian's laws and regulations for environment and social processes and the World Bank' ESF. This ESMF is prepared in consultation with stakeholders where their specific concerns have been addressed.

35. The ESMF describe the environmental and social screening process that will be conducted for all project activities to determine the necessary specific instruments to be prepared before commencement of applicable project activities. This environmental and social screening process is to be used by PH Trail who is responsible for planning, implementation, and management of sub-projects.

### **1.5 Organization of the Framework**

36. The Framework is organized as follows:

- Chapter 1 provides the introduction to the Framework;
- Chapter 2 presents the legal framework;
- Chapter 3 presents a summary of the Project;
- Chapter 4 present a summary of baseline environmental and social conditions;
- Chapter 5 describes the potential environmental and social impacts of the Project;
- Chapter 5 describes the proposed environmental and social mitigation measures;
- Chapter 6 presents the environmental and social screening process for sub-projects;
- Chapter 7 presents the public consultation process carried out during the preparation of the ESMF and summarizes the outcomes;
- Chapter 8 provides the institutional setup for environmental and social monitoring and capacity building and training at PIA to ensure efficient implementation of the ESMF.

## **CHAPTER TWO: THE LEGAL FRAMEWORK**

### **2.1 Palestinian Legislation Relevant to the Implementation of the Project**

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

### **2.2 Institutional Framework**

38. At present EQA is the main Authority which is responsible for environmental issues in Palestine.

### **2.3 Environmental Legal Framework**

#### **2.3.1 The Palestinian Environmental Law**

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

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

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

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

### **2.3.2 The Palestinian Environmental Assessment Policy (PEAP)**

43. 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.

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

### **2.3.3 Public Health Law**

45. The two documents comprising the legal framework of Palestinian National Authority (PNA) health care are the 2003 Palestinian Constitution and the 2004 Public Health Law. 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.

### **2.3.4 Labor Law**

46. The Palestinian Labor Law No. 7/2000 is applicable to the Project. The law includes provisions for occupational health and safety measures, protection of workers' rights, ensuring a safe working environment, life insurance, accidents insurances, working hours and workers' wages.

### **2.3.5 3.1.5 Palestine's COVID-19 Response Plan, April 2020**

47. The purpose of this plan<sup>2</sup> is to: Present the Government of Palestine (GoP's) strategy and actions; Propose an aid coordination approach; Identify the critical support needs, including for: public health response to COVID-19; budget support to maintain government services; and diplomatic engagement with regional partners; and Describe the Government expectations of the longer-term economic impact of COVID-19 and required economic recovery actions.

## **2.4 World Bank Environmental and Social Framework (ESF)/Environmental and Social Standards (ESSs)**

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

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<sup>2</sup> <https://www.ochaopt.org/sites/default/files/covid-19-response-plan-inter-agency-opt.pdf>

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

49. Full list and details of World Bank environmental and social standards can be found in the following link:  
<http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf>

50. ESS1 and ESS10 apply to all projects supported by the Bank through Investment Project Financing. The Borrower will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation.

51. ESS2, ESS3, ESS4, ESS6 and ESS8 are relevant and ESS5, ESS7 and ESS9 are not relevant to the project activities as discussed in section 6.2 below.

52. In line with ESS1, PHT prepared this ESMF related to the project activities which would include cleaning of walks and plantation of trees, organic farming, procurement, and installation of equipment, etc. In line with ESS2 and ESS4, PHT has prepared Labor management Procedures. In line with ESS6, PHT shall develop environmental guidelines for beneficiaries to prevent degrading natural and physical integrity, damage the natural habitat and wildlife. To fulfill the requirements of ESS8, PHT shall develop guidelines for beneficiaries to prevent degrading physical cultural resources and adopt chance find procedures for any trail upgrading activities. Also, to fulfill the requirements of ESS10, PHT has prepared a stakeholder engagement plan (SEP).

## **2.5 Environment, Health and Safety Guidelines**

53. The World Bank Group Environment, Health and Safety (EHS) guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). They define acceptable pollution prevention and abatement measures and emission levels in World Bank financed projects.

54. The project will apply the General Guidelines including (i) environmental, (ii) occupational Health and Safety including the Palestinian Authority and the WHO guidance for COVID-19, and (iii) community Health and Safety.

Comparison between the WBG ESF and PEL, convergence and discrepancies

A gap analysis was also made to the applicable ESSs and Palestinian's National laws and Regulations. The table below shows this analysis and gives recommendations to be applied for the

ECD project.

### Gap Analysis of Applicable ESSs and Palestinian's National laws and Regulations

Issue	National Laws and Requirements	WB ESF and gaps with National Laws	Recommendations
<b>ESS1: Assessment and Management of Environmental and Social Risks and Impacts</b>			
Environmental and social risk classification and assessment	Low, medium, significant	Four classifications: High Risk, Substantial Risk, Moderate Risk or Low Risk.	WB ESF prevail
Environmental and social assessment instruments	Category A, B and C	ES instruments ESIA, ESMP, ESMF, strategic environmental and social assessment (SESA)	WB ESF prevail
<b>ESS 2: Labor and Working Conditions</b>			
To promote safety and health at work	Refer to article 90, 91, 92 of the Palestinian Labor Law no.07 of 2000 FIDIC 99 clause 4.8 & 6.7	There is no gap between the national labor law and the World Bank OHS guidelines	Apply Palestinian Labor Law
To promote the fair treatment, non-discrimination and equal opportunity of project workers	Refer to article 16, 100, and 106 of the Palestinian Labor Law no.07 of 2000	There is a gap in regards to measures to prevent and address harassment, intimidation and/or exploitation. Where Palestinian Labor law is inconsistent with this clause, the project will seek to carry out project activities in a manner that is consistent with World Bank guidelines.	Apply World Bank Guidelines as stipulated in ESS2
To protect project workers against (GBV) and child abuse/exploitation (CAE) issues and Code of Conduct and contracted workers,	Refer to articles 93-99 of the Palestinian labor law no.07 of 2000 that discuss regulating the work of minors. Also refer to article (4) of	There is no gap between the national labor law and the World Bank OHS guidelines	Apply Palestinian Labor Law

Issue	National Laws and Requirements	WB ESF and gaps with National Laws	Recommendations
community workers and primary supply workers, as appropriate.	amendment #19 of 2012 and child law no. 07  No National law in regards to gender based violence	Refer to World Bank guidelines in regards to gender based violence in EFS	Apply World Bank Guidelines in ESF
To prevent the use of all forms of forced labor and child labor	Refer to articles 93-99 of the Palestinian labor law no.07 for the year 2000 that discuss regulating the work of minors	There is a gap in regards to forced labor	Apply World Bank Guidelines in ESF
To support the principles of freedom of association	Refer to article 5 of the Palestinian labor law no.07 of 2000 that ensures that both workers and employers have the right to establish union organizations	There is no gap between the national labor law and the World Bank OHS guidelines	Apply Palestinian Labor Law
To provide project workers with accessible means to raise workplace concerns/grievances	The right of the public to complain is ensured by the grievance bylaw approved by the Ministerial Cabinet on 2005 and updated on 2009	The ESF requires that a grievance mechanism will be provided for all direct and contracted workers (and, where relevant, their organizations) to raise workplace concerns	Apply World Bank Guidelines in ESF
<b>ESS 4: Community Health and Safety</b>			
To avoid adverse impacts on health and safety of project-affected communities during the project lifecycle	Based on FIDIC 99 clause 4.8 & 6.7 FIDIC 99 clause 4.8 & 6.7; a Safety plan should be provided: Spray the dust with water Work only at the allowable hours. Use safety fence	There is gap resulted from the fact that FIDIC only provides general guidelines	Apply FIDIC & ESS4 (3.3 of the “Environmental, Health, and Safety (EHS) Guidelines General EHS Guidelines: Community Health & Safety”) and EHS guidelines.



Issue	National Laws and Requirements	WB ESF and gaps with National Laws	Recommendations
	around the site.		
To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.	Use boundary stones around the hole in the streets. Put the necessary warning signs	There is gap resulted from the fact that FIDIC only provides general guidelines	Apply FIDIC, ESS4, and section 3.4 of the Environmental Health and Safety (EHS) Guidelines General EHS Guidelines: Community Health & Safety
To have in place effective measures to address emergency events	Based on FIDIC 99 clause 4.8 & 6.7; Safety plan should be provided. The emergency phone numbers should be available in the site and easy to access. Provide a first aid box	There is gap resulted from the fact that FIDIC only provides general guidelines	Apply FIDIC, ESS4, and section 3.7 of the Environmental Health and Safety (EHS) Guidelines General EHS Guidelines: Community Health & Safety
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	Safety plan should be provided.	There is a gap where there is no coverage for this issue in any national document	Apply ESS4 and section 3.7 of the Environmental Health and Safety (EHS) Guidelines General EHS Guidelines: Community Health & Safety
<b>ESS10: Stakeholder Engagement and Information Disclosure</b>			
Stakeholder engagement and information disclosure	Consultations are required for EIA. Public disclosure is not required for projects that do not require a full EIA.	The Bank will require engage with stakeholders, through information disclosure, consultation, and informed participation. SEP shall be developed and disclosed.	WB ESF prevail

Issue	National Laws and Requirements	WB ESF and gaps with National Laws	Recommendations
		Public disclosure is required for all EA reports.	
Project grievance mechanism	The Palestinian Bylaw sets the rules for grievance of the public and the improving the performance of the Palestinian Ministries and Authorities. No project GRM is required.	The ESS ensures reception and timely response to any complaints made about the Project and be the basis for developing appropriate mitigation strategies	WB ESF prevail

## CHAPTER THREE: SUMMARY OF THE PROJECT

### 3.1 Introduction

55. The proposed project is consistent with the WBG's Assistance Strategy for the West Bank and Gaza (FY 18-21), which defines as primary objective to support private sector development and investments and create an environment for dynamic and inclusive job creation in the West Bank and Gaza. The proposed project is consistent with all these objectives as it aims to combat unemployment and creates jobs, especially among marginalized groups (women and youth) in rural communities, promotes investments by the private sectors and reinforces linkages among the actors of the experiential tourism value chain. The project follows the Cascade approach developed by the Bank since it works on building partnerships and value chain integration between small rural communities, NGOs in the experiential tourism field, and tour operators in the private sector, with the aim of maximizing finance for development. The matching grants that under Component 1, will directly leverage investments from the private sector, communities and NGOs. In addition, the implementing agency will strengthen and build new partnerships with local business to invest in local communities and promote the Trail to local and international target groups.

### 3.2 The project Components

56. The project will use the financing from the JSDF to promote local community development through the implementation of the following two components:

**(1) Community Driven Development (US\$1, 1,715,000); and**

**(2) Project Management and Administration, Monitoring and Evaluation, and Knowledge Dissemination (US\$685,00).**

#### **Component 1: Community Driven Development (\$1,715,000)**

57. This first component will include three sub-components as follows. Also, for all the activities of this first component, no new construction will be made since existing structures will be used, and no removal of trees will take place. To implement Component 1, the implementing agency will strengthen and build new partnerships with major stakeholders to involve them in the economic dynamic generated by the Palestinian Heritage Trail.

58. **Sub-component 1.1: Tourism Communities Development (US\$1,160,000)- This activity will finance community- subprojects, including trainings and grants to improve community-based tourism experiences, start and grow their businesses, and improve the outreach and communication with tourists/visitors using digital means.** Trainings and grants will support: (i) the establishment of new services providers along the PHT, like soap and olive making, wine production, glass and handcrafts making, and organic farming, first aid stops and rest areas. These experiences would offer tourists the opportunity to see how these items are traditionally made and buy products towards the end of their visits; (ii) Trail development activities including "within community" activities, such as inter-community walks, way-marking and signages, bike trails, city tours and so on; and (iii) specific trainings of individuals and communities on hygiene practices, cleaning and respecting the environment, and on foreign languages such as English, French, and other languages. This will also include a comprehensive "Managers of the Trail" training, developed by PHT with the participation of several stakeholders, to build the capacity of community leaders to sustainably develop and manage trail activities at community level.

59. Some of the activities of this sub-component will exclusively target women and youth, as for example some trainings will be only for women and beneficiary women will be offered peer to peer services and empowerment activities. Also, the implementation of the sub-component will follow a cluster approach and will strengthen the linkages among communities and their capacity to work together.

60. The funding under this sub-component will reach out to the communities through matching grants of approximately US\$20,000 for beneficiary project, taking into consideration that communities will match the financing, contributing to 30% maximum of the activities associated costs. It is estimated that about 50 matching grants will be awarded to potential beneficiaries starting from the end of the first year of implementation.

61. The specific criteria for the selection, financing and implementation mechanism of the activities of this sub-component will be identified in the project operational manual (POM), however, for the grant matching scheme the project will explore the formation of inclusive community-based committees and engage community members in a participatory needs assessment and in the clustering approach that will be implemented.

**62. Sub-component 1.2: Fostering Entrepreneurship (US\$460,000)- This activity will finance subprojects that foster entrepreneurship for startups and already existing businesses at an individual, firm-level, with focus on female and young entrepreneurs, to create new tourism experiences along the trail.** Target beneficiaries will be mainly micro and small firms, most of which are informal. Sub-projects will finance activities such as: (i) training and technical assistance, including activities such as training on dynamics of entrepreneurship and skills for managing businesses, accounting and financial literacy, support for business registration, quality certification, and branding; (ii) activities to upgrade the business such as painting of some areas, cleaning and removal of every possible risk; and (iii) the provision of some small equipment such as bed for homestays, kitchen equipment, bathrooms updates and so on. The criteria for the selection of the activities and financing will be identified in the project operational manual.

63. A demand-driven approach will be implemented to encourage participation by the beneficiaries. The project will select entrepreneurs competitively, help them build up their business models, and provide financing to support their implementation. Overall, the Palestinian Private sector will partner with the PH Trail in the implementation of the activities of this sub-component.

**64. The financing will be through matching grants that will benefit an estimated 40 beneficiaries (Palestinian individuals and firms) for an average amount of approximately US\$8,000 per beneficiary.** The matching grants will leverage investments from individual beneficiaries and the private sector since they will require a matching contribution. All the technical aspects and delivery mechanism of the matching grants will be finalized in the project manual.

65. Under both sub-components 1.1 and 1.2 of the community driven development component, the matching grants will finance only activities that will show potential results related to the PDO indicators (increased income, number of working hours created by the project, and number of individual beneficiaries). The matching grants will be implemented directly by PHT through a scheme that will incorporate international lessons learned by the Bank on several matching grants projects.

**66. Sub-component 1.3: Promoting Outreach (US\$95,000)- This sub-component will support the development of an interactive digital platform for community-based tourism in the West Bank and some awareness and promotion activities to promote the most vulnerable groups and communities.** The platform will include all information about homestays, guest houses, guides, artisan centers, trip itineraries, maps, and contacts. This will facilitate trips for increasing the number of individual travelers. The digital platform will leverage the wide connectivity of Palestinians to the internet through smart

phones. It will also leverage the wealth of information and data sources that the implementing agency has accumulated over the last five years, including walking trail cartography, profiles of touristic sites, names and history of villages, and contacts and profiles of tour operators, wilderness guides, and homestays, to provide handy and accessible information to tourists/walkers, and to attract higher spending travelers. The platform will also allow for better tracking of community-based tourism performance statistics and trends.

67. The digital platform will include other partnerships (for example with international fitness companies, historical societies, National Geographic etc.), that could help to create and market “virtual cultural walks” where local guides could undertake the walk and share their experience, even if COVID resurges as well.

68. The sub-component will finance some awareness and promotion activities to promote the most vulnerable groups and communities to domestic and foreign visitors. They will focus on the promotion of the service providers like organized trips for tour operators, media and special interest groups, and on the provision of the service providers with the needed printed materials.

**Component 2: Project Management and Administration, Monitoring and Evaluation, and Knowledge Dissemination (US\$685,000)**

**69. This component includes the following three sub-components: (i) Project Management and Administration; (ii) Monitoring and Evaluation; and (iii) Knowledge Dissemination.**

**70. Sub-component 2.1: Project Management and Administration (US\$456,000): PHT will be the implementing agency of the project and this sub-component will mainly cover the costs of fiduciary staff (one procurement and one financial personnel), a project manager, some partial time of PHT director and of PHT gender specialist, and the project audits.** A thorough capacity assessment of PHT as implementing agency was conducted by World Bank experts, which confirmed that PHT has the financial, procurement, technical and organizational capacity to manage the grant project. PHT also has a good record of implementing projects financed from its own resources as well as externally financed projects, is able to follow the financial management and oversight procedures required by third party sponsorship and is audited on an annual basis.

71. However, some specific measures have been identified to further strengthen PHT institutional capacity to effectively implement the project. These measures include: (i) hiring a project manager; (ii) hiring a qualified procurement officer with experience handling procurement under projects financed by international donor agencies, and a junior financial specialist; (iii) preparing a procurement manual, which will integrate the Project Operational Manual (POM), defining the decision making authority, the procurement methods and procurement processing procedures and forms as well as filing/documentation needs; (iv) developing in the POM a section with the financial management procedures; and (v) providing procurement and financial management training to PHT staff and management.

**72. Sub-component 2.2, Monitoring and Evaluation (US\$148,500): the first activity to be implemented under this second sub-component will be the tracking of project’s results and the achievement of the PDO indicators.** This component will finance the hiring of a Monitoring and Evaluation specialist, a consultant to complete the ICR, and operating costs. To this purpose, a participatory monitoring and evaluation (M&E) approach will be introduced, which will promote socio-economic appraisals of the community-based projects and of the activities that will foster entrepreneurship. In addition, the M&E participatory approach will facilitate the ownership by the beneficiaries of the project activities.

**73. PHT will assign the M&E specialist to coordinate and to facilitate the M&E aspects of the project.** He/she will develop the relevant data collection tools and will meet directly with the beneficiary communities and individuals and with key stakeholders to discuss and review the updates of main indicators, their collection and their changes over time. To this purpose, he/she will also provide training to beneficiaries to facilitate and support them in self-reporting project' results through the existing PHT online M&E system. The M&E specialist will also develop his/her tasks in close collaboration with PHT field coordinators that will support the collection of relevant data, as needed, complementing the self-reporting of the beneficiaries. Data will be collected monthly and/or quarterly. All the data and information will be stored in the PHT database.

74. The M&E specialist will also work on data analysis closely with beneficiaries and stakeholders during ad-hoc meetings, seminars, and workshops. All the data and sources combined will provide robust, reliable, and realistic indicators that will reflect the progress and the results of project implementation.

**Sub-component 2.3, Knowledge Dissemination (US\$80,000): this last sub-component will finance the launching event and two dissemination events.** One of these last two events will be in the field to share project results, lessons learned and project gains with major stakeholders, representatives of the Japanese government, donors, representatives of the private sector, and so on, while the second event will be in Washington DC.

### **3.3 Potential Sub-projects**

75. Based on the project description and components, it is anticipated that the project will likely involve: (i) trainings of communities to improve community-based tourism experiences, within community.

Trainings and grants will support: (i) the establishment of new services providers along the PHT, like soap and olive making, wine production, glass and handcrafts making, and organic farming, first aid stops and rest areas. These experiences would offer tourists the opportunity to see how these items are traditionally made and buy products towards the end of their visits; (ii) Trail development activities including "within community" activities, such as inter-community walks, way-marking and signages, bike trails, city tours and so on; and (iii) specific trainings of individuals and communities on hygiene practices, cleaning and respecting the environment, and on foreign languages such as English, French, and other languages. This will also include a comprehensive "Managers of the Trail" training, developed by PHT with the participation of several stakeholders, to build the capacity of community leaders to sustainably develop and manage trail activities at community level. The training and technical assistance, including activities such as training on dynamics of entrepreneurship and skills for managing businesses, accounting and financial literacy, support for business registration, quality certification, and branding; (ii) activities to upgrade the business such as painting of some areas, cleaning and removal of every possible risk; and (iii) the provision of some small equipment such as bed for homestays, kitchen equipment, bathrooms updates and likewise.

### **3.4 Project beneficiaries**

76. The project aims to benefit about 3,000 beneficiaries, including Palestinian individuals present in about 50 fragile communities along the PH Trail across all the West Bank. There will be a special focus on women and youth since they will constitute more than 50% of the beneficiaries. Secondary beneficiaries would include the walkers and visitors, newly hired workers, apprentices, and other

communities and firms that purchase the improved products or get the improved services.

### 3.5 Institutional Structure

77. PHT, a local NGO, will be the Project Implementing Agency (PIA) and the grant recipient responsible of the overall project implementation and management of the account. PHT is based in Beit Sahour which is developing the PH Trail in the West Bank as a community-based tourism project. It promotes cultural diversity, tradition, human values, and environmental awareness. PH Trail is a union of three Palestinian organizations, which has a close working relationship with Bethlehem University. PHT are the only local organization works in the West Bank and Gaza with detailed data regarding community-based tourism. This makes PH Trail a leading local player in the field, a position that is supported by the Ministry of Tourism and Antiquities (MOTA) and by other main stakeholders that see PH trail as the natural Destination Management Organization (DMO) of the PH Trail.

78. PH Trail will be responsible for all fiduciary aspects including financial management, procurement, and management and monitoring of environmental and social aspects, incurring expenditures and making payments.

### 3.6 Ineligible activities

79. Activities where WB Standards ESS5 is applicable or activities include use of pesticides or activities in protected/sensitive areas or could affect cultural heritage or use tangible and non-tangible cultural heritage for commercial purposes will not be funded under the project. In summary, this project will not finance sub-projects that would include:

- Activities that limit or deprive of individual or community's access to land or available resources;
- Activities that cause land acquisition or displacement of individuals or communities;
- Activities in the protected areas and sensitive or critical natural habitats, as well as sub-projects that include logging;
- Activities that include the use of pesticides;
- Activities that affect cultural heritage; or activities that may potentially use tangible and non-tangible cultural heritage for commercial purposes

80. Sub-projects that may result in generation of large quantities of hazardous waste (asbestos waste, CFLs, lead paint debris, heating oil contaminated tanks, etc.) or special types of hazardous waste (e.g. radioactive lightning rods) will not be eligible for funding. Risks associated with various sub-projects is expected to vary from low to moderate risks.

#### Exclusion list

81. A number of activities are ineligible for financing under the Project. These include the acquisition of land, substantial and high-risk projects, as well as the activities from the general WB exclusion list, as follows:

- 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,
- Tobacco, unmanufactured or manufactured,
- Tobacco processing machinery, and
- Manufacturing of firearms.



## CHAPTER FOUR: BASELINE ENVIRONMENTAL AND SOCIAL CONDITIONS

### 4.1 General

82. The West Bank has an area of 5820 km<sup>2</sup> and populates about 3.5 million inhabitants distributed among 11 administrative governorates; the largest is Hebron at south, which extends at 20% of West Bank area. Gaza populates about 2 million living in on an area of 365 km<sup>2</sup>, ranked the 3rd most densely populated polity in the World.

### 4.2 Socio-Economic Context

83. The West Bank and Gaza have faced long lasting political instability and periodic episodes of violence over the last two decades, exacerbating macroeconomic volatility. The economy has been driven by large inflows of transfers as other sources of growth have been long hindered by the ongoing restrictions on movement and access. Inflows of transfers have significantly dropped in recent years, making it more pressing to unlock growth constrained by a difficult business environment. The trade and movement restrictions have created a high risk of disruption in projects or trade and have kept investment levels low, resulting in a bias towards non-traded services which have less potential for productivity growth.

84. Growth in 2019 is estimated to have been weak, reaching 0.9%, as economic activity was disrupted for most of the year due to the fiscal crisis. Notably, this outturn is a result of Gaza registering minimal positive growth following a steep recession in 2018 (-3.5%), while growth in the West Bank in 2019 is expected to reach the lowest level over the last five years (1.1%), down from 2.3% in 2018.

85. Following the fiscal crisis in 2019, the Palestinian economy was projected to slowly recover in 2020. However, the COVID-19 outbreak is weighing on economic activity. Living conditions are difficult with a quarter of the labor force unemployed and 24% of Palestinians living below the US\$5.5 a day (2011 PPP) — even prior to the recent outbreak. A larger than expected decline in aid will further weigh on the economy. Furthermore, measures put in place by the PA since early March 2020 to halt the spread of the COVID-19 outbreak, while effective in limiting the spread of the virus, seem to have resulted in disruptions in economic activity, especially in the West Bank. As a result, the economy is expected to contract by 2.5% in 2020.<sup>3</sup>

86. The West Bank is also home to residents in discrete geographic pockets who face significant economic hardship, for example, the two rural areas of Jericho and Hebron are even worse than Gaza.<sup>4</sup> Analysis of the degree to which assets and consumption varies among households suggests that the gap between poor and rich inhabitants is more pronounced in the West Bank than in Gaza. Rural Jericho and rural Hebron face the lowest values of the assets index in the West Bank and Gaza. Within the West Bank, the communities existing in governorates that experience high political instability, violence and limited access to socio-economic opportunities tend to have households with lower average assets and constitute areas with a higher density of marginalized people.

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<sup>3</sup> Palestinian Territories' Economic Update, the World Bank, April 2020.

<sup>4</sup> Avenues for Social and Economic Inclusion in Palestine, World Bank, 2018. Main author Sarah Keener.

### 4.3 COVID-19 Impact on Tourism

87. In the West Bank, the number of tourism activities suddenly dropped to zero. All 32,000 Palestinians employed in this industry have become unemployed. The current difficulties and complications are exacerbated by the debts that the sector accumulated from large investments into the tourism sector during the past few years, especially in 2019. The tremendous damage caused by the loss of the tourism industry has devastated Palestinian GDP and foreign exchange reserves. The number of tourists who visited East Jerusalem and the West Bank in 2019 reached 3.5 million; they arrived either through incoming tourism offices or on their own initiative. In 2019, the total direct and indirect revenue from inbound tourism into the West Bank amounted to about US\$1 billion.<sup>5</sup>

### 4.4 Environmental Baseline Information

88. Baseline environmental and social information for West Bank is available in the already prepared Environmental and Social Assessment reports such as EIA, ESIA, ESMP, etc for previous West Bank and Gaza projects. These reports have good documentation about the environmental and social issues including climate, air quality, roads, noise, available water resources, water quality, vegetation cover, agricultural resources, employment and income, occupational health and safety, natural habits and sanctuaries, resettlements, culture and heritage, recreation and tourism, marine life resources, issues. Examples of reports to refer to:

- ESIA for Environmental Assessment Report for Wastewater Treatment Plant Ramallah;
- ESIA for Environmental Assessment Report for Northeast and Southwest Jenin Water Supply Projects Jenin Governorate – West Bank;
- Environmental, Social, and Cultural Heritage Impact Assessment (ESCHIA) for Hebron Wastewater Management Project;
- Feasibility Study and ESIA for Wastewater Management in Tubas, Tayasir, Aqqaba and Al Aqaba;
- Environmental Impact Assessment for Rawabi Community ESIA for Hebron Solar Photovoltaic (PV) project.
- Environmental Assessment in Relation to Biodiversity

### 4.5 Environmental and Social setting

89. PHT will review and approve the screening of sub-project applications for any specific environmental or social impact. Factors that will be taken into account are the specific site selected for the intervention, the scope of activities to be financed, the timing of the activities, the institutional and organizational capacity of the beneficiary firm/individual and whether the intervention will be executed in accordance with the relevant ESS as indicated in this ESMF.

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<sup>5</sup> Tony Khashram, Latin Patriarch of Jerusalem, April 2020 ([link](#))

## CHAPTER FIVE: ENVIRONMENTAL AND SOCIAL IMPACTS

90. This chapter analyzes the potential environmental and social impacts and risks that the implementation of the Project poses, the mitigation measure for the negative impacts and the proposed ESMP and the monitoring plan.

91. The project will increase economic opportunities and creation of hours of work and improve livelihood by revitalizing businesses for about 3,000 Palestinian individuals -, present in fragile communities along the PH Trail, across all the West Bank, with a special focus on women and youth. The specific positive impacts of the project are: (i) strengthen and build new partnerships with major stakeholders to involve them in the economic dynamic generated by the PH Trail, (ii) improve community-based tourism experiences, start and grow their businesses, and improve the outreach and communication with tourists/visitors using digital means, (iii) foster entrepreneurship for startups and already existing businesses at an individual, firm-level, with focus on female and young entrepreneurs, to create new tourism experiences along the Trail, and (iv) support the development of an interactive digital platform for community-based tourism in the West Bank to include all information related to homestays, guest houses, guides, artisan centers, trip itineraries, maps, and contacts.

### 5.1 Project Components and Activities that Raise Environmental and Social Concerns

92. Of all of the activities included in Component 1, only those involving physical works are likely to generate negative environmental and social impacts and risks of note. Specifically, these activities are: (i) soap and olive making; winery; glass and handcrafts making; organic farming, way-marking and signages; planting trees and gardening of some areas; improving first aid stops; cleaning and respecting the environment (component 1.1) and (ii) procuring and installation of equipment (Sub-component 1.2). These activities will take place in already existing building structures (no new building construction is necessary) and/or having outdoor normal community activities such as organic farming. The sources of impacts from those activities will arise from small construction activities associated with installation of equipment, renovations and rehabilitation, refurbishment to be carried out in livelihood facilities, furnishing and equipping existing rooms and shops during startups and sub-project activities during the operation phase. These activities involve technically simple operations of very modest scale, such as the installation, upgrade and connection of equipment, software, peripherals, cabling, electricity supply, etc. for indoor activities or painting for marking the tourism Trail, plantation of trees and cleaning of walks for outdoor activities on the Trail. The small construction associated with the project activities entails OHS risks and generate small amounts of construction waste including some amounts of asbestos and cements waste, or other building materials, ceramics, or other.

93. The beneficiary firms/individuals will access new Ad hoc equipment for olive oil, herbal soap, wine, handcrafts, traditional food, and organic farming which will be installed on their available spaces and premises. Depending on the type of product, these products utilize raw materials consisting of olive oil, grapes, and organic fertilizers. Chemicals such as the paint of upgrading the business and caustic soda/sodium hydroxide, lye solution is used for making herbal soap. Residues such as olive pulp and bone are byproducts from olive oil making. Skin and pulp are byproducts from wine making.

94. As an indirect impact of the project the General waste and garbage are also a result of the tourism activities. As more tourists arrive there is an increase in food and beverages consumed, which in turn

creates waste plastic and non-biodegradable products.

95. The suppliers to the Project materials and equipment, including organic fertilizers, winey, traditional food and olive oil equipment shall be local companies and formal businesses buying materials and equipment which subject to high standards from Israel and international companies. These sectors are not known to involve significant risks of child labor and forced labor. In all cases where suppliers will be engaged, contractors will be required to inquire during their procurement process whether the supplier has been accused or sanctioned for any of these issues and also their corporate requirements related to child labor, forced labor, and safety.

## 5.2 Potential Environmental and Social Impacts

### ESS1: Assessment and Management of Environmental and Social Risks and Impacts

96. Potential environmental impacts are associated with small construction activities associated with installation of equipment, renovations, rehabilitation, and refurbishment. The anticipated potential environmental impacts may include: (i) generation of small amount of solid waste from the installation activities and from end of life of equipment; (ii) management and disposal of waste; (iii) nuisance related to vibration and noise during installation activities; and (iv) OHS risks related to OHS incidents during installation activities including exposure to electrical hazards from the use of tools, noise and dust, lifting of heavy equipment and falling and falling objects. The impacts are expected to be site specific, short-term and reversible. During operation, OHS risks including exposure to electrical hazards from the use of equipment and exposure to hazardous materials such as caustic soda especially used for herbal soap making has low probability but possible and could be minimized through abiding to tailored OHS measures for each activity. Organic farming activities may affect soil and surface and groundwater quality. Therefore, protection of surface and groundwater in addition to the soil are required to mitigate these impacts. Increased solid waste generation is expected during implementation as a result of the minor constructions/rehabilitation/installation activities, as well as due to the increased economic activities from community subprojects from olive oil, herbal soap, wine, handcrafts, traditional food, and organic farming, including touristic activities, in the communities along PH Trail. In addition, irresponsible visitation of the area due to indirect impact from increasing touristic activities especially unorganized visitors go directly to the Trail for barbecues in the Trail might lead to damage such as fire and littering. The project intends to finance the preparation of traditional food which could be subject to improper food safety procedures. However, PHT has protocol on food safety and has long experience in providing training to women centers and home stays. During the project activities, PHT will continue providing training on food safety and hence, the risk related to food safety is very low.

97. Despite the small scale and localized nature of the sub-projects, the environmental risks and impacts discussed above are of moderate significance because PHT has no Safety, Health and Environment (SHE) department or environmental and social expert.

98. The project intends to improve the touristic activities within the Project area which will increase the risk of COVID-19 exposure beyond the general risk of exposure associated with the ongoing pandemic.

99. Project intends to improve touristic activities which will increase human traffic and creation of hazardous driving conditions to the communities along the Trail. PHT, the implementing agency, has

long experience working in these communities, nonetheless, this is a risk that needs to be mitigated. Other risks could include risks of accidents and traffic congestion due to increasing touristic activities.

#### ESS2: Labor and Working Conditions

100. The project components are expected to employ a number of workers who will be engaged with PHT and hired or engaged with beneficiary firms to upskilling their workforce and workers engaged with contractors and equipment suppliers to work on small construction activities and installation of equipment in subprojects such as painting for marking the tourism Trail, plantation of trees and cleaning of walks for outdoor activities on the Trail as well as small construction activities associated with rehabilitation, furnishing and equipping existing rooms and shops during startups and already existing businesses at an individual and firm-level. The workers will be contracted through contractors/suppliers. As a result, direct and contracted workers will be involved in the project activities. It is assessed that the key labor risks are related to workers' occupational health and safety as mentioned above, child labor and poor working conditions. Labor management procedure (LMP) is prepared to set out the Project's approach to meeting national requirements as well as the objectives of the Bank's ESF concerning labor and working conditions (ESS2).

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

101. ESS3 is relevant to the project as it will involve construction and operation activities that would generate wastes, could cause pollution. Increased solid waste generation is expected during implementation as a result of the minor constructions/rehabilitation/installation activities, as well as due to the increased economic activities from community subprojects from olive oil, herbal soap, wine brewing, handcrafts, traditional food, and organic farming, including touristic activities, in the communities along PH Trail. Also, hazardous materials such as the paint that will be used for upgrading the business and the caustic soda especially used for herbal soap making has low probability but possible. These issues will be addressed in subprojects' site-specific instruments.

#### ESS4: Community Health and Safety Risks

102. This standard is relevant. The project involves very few civil works/construction activities. Therefore, it is not expected to adversely affect local communities' health or safety. In addition, activities of beneficiary firms/individuals are not expected to induce labor influx that might lead to adverse social impacts (such as SEA/SH and communicable diseases) on local communities. However, the increased tourism, both local and international, will increase interacting with communities. These interactions would increase the risk of exposure to the corona virus for the communities. The interaction will also increase the risk of exposure of youth, including vulnerable youth and women to GBV, SEA/SH. The project will ensure the avoidance of any form of GBV, SEA/SH of community members by establishment of referral pathways. The project level GM will include specific procedures for GBV including confidential reporting and ethical documentation of GBV cases. PHT will develop a security and safety plan which will include training materials on safety and security as part of the capacity building and awareness campaigns to the beneficiaries and communities.

#### ESS5

103. There are no locations where land acquisition or resettlement is required. Therefore, ESS5 is not relevant to this project. However, the small civil works will be on existing beneficiary firms' grounds which are owned by beneficiaries. No expansion of facilities or building of new facilities will be part of the project. therefore, no new land will be acquired or accessed. Private individuals/firms seeking co-financing to establish new enterprises will need to demonstrate adherence to willing-buyer willing-seller criteria to qualify. Hence no land acquisition and resettlement will be required. The ESMF,

includes an exclusion list of activities that the project will not support, including any that could lead to involuntary resettlement or land acquisition. In addition, the manual for the selection of sub-projects will include eligibility criteria to exclude any sub-project involving land issues.

#### ESS6

104. ESS is relevant to this project, although the project will not affect any natural habitats as defined under the standard nor will it affect any ecosystem services. Project activities will not involve any removal of trees or vegetation nor will it have any impacts on biodiversity. Furthermore, the project does not involve the management of any living natural resources. However, traditions and customs of the communities along the path will serve as tourist attraction. Also, the trail passes through some natural habitats that fall amongst ineligible investments in the protected areas, or critical natural habitats, including logging. The increased number of visitors along the Trail is indirectly expected to result in potential damage to the natural habitat and disturbance to wildlife due to vandalism actions of the visitors.

#### ESS7

105. This ESS is not relevant to the project as there are no indigenous peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the area.

#### ESS8

106. This ESS is relevant to this project, though none of the physical, cultural, and/or archaeological sites will be directly impacted by the project. As chance findings are unlikely because there are no civil work requiring digging or trenching, but possible during the small-scale community activities, such as creating inter-community walks, through way-marking and signages; planting trees and gardening of some areas, improving first aid stops. However, an adequate clause will be included in the environmental assessment documentation providing management procedures of chance finds (ESMP Checklists and site specific ESMPs). Procedures in the case of chance findings will follow the national procedures as requested by MoTA. The traditions and customs of the communities along the path will serve as tourist attraction. The increased number of visitors along the Trail is indirectly expected to result in potential degradation of natural and physical integrity local artifacts in the area due to poor management practices in the eco-tourism places along the Trail. The mitigation measures are listed in the table below.

#### ESS9

107. This ESS is not Relevant to the project as the project will not use financial intermediaries as an instrument for channeling funds to the beneficiary communities in the project area of influence.

#### ESS10

108. This ESS is relevant to the project as the main stakeholders are the communities living along the PH Trail (approximately 60 communities). Within these communities, mainly rural and fragile, the project will target women and youth who will constitute more than 50% of the beneficiaries, with each cohort of them constituting more than 25% of the beneficiaries. The project aims to provide livelihood and economic opportunities to local women's associations, youth groups, local councils, relevant CBOs and CSOs, and to individuals. For the design of the project components and for the identification of its activities, the PHT team has already conducted two consultation sessions in Feb 2019 with about 23 communities. However, based on the discussion with PHT, the consultations were carried out without taking into consideration the proper requirements of ESS10. Later, a Stakeholder Engagement Plan (SEP) consistent with ESS10 requirements is being prepared by PHT and will be

disclosed both within the country and on the World Bank's web site prior to project appraisal. The SEP explains the way through which all affected communities are included in the consultation and methods to be used to reach not only the most remote and fragile communities but within them the most vulnerable and fragile members of these communities. The SEP draws up in line with the guidance provided by the Bank relating to public consultation for projects under COVID-19. The SEP addresses specific risks identified by stakeholders and it will be updated as and when necessary, after the Project enters in force (becomes effective). There will be a GM system established in accordance to ESS10 requirements which will be in place for this project to ensure that PAPs and OIPs have the access to a viable system to grievances and to seek resolution with no intimidation or coerciveness. The grievance system is also important for PH Trail to ensure they are accountable to complaints and that these complaints are handled transparently and efficiently. PAPs, OIPs and other potential complainants should be fully informed of the GM, its functions, procedures, timelines and contact persons' information both verbally and through booklets and information brochures during consultations meetings and other stakeholder engagement activities. Description of grievance process, receipt of grievances, and grievance monitoring and reporting are provided in the SEP. Reporting and allegation procedures regarding SEA/SH and an accountability framework and response to complaints will be included in the GM.

109. The social risks associated with the project are considered moderate. The social risks are limited in nature and scale, and can be summarized as follows: (i) risks related to elite capture and social exclusion or inequity in its various forms which could arise from unfairness and inequity in decision making in financing sub-projects that would need to be mitigated through ensuring that project benefits, such as access to grants, and job opportunities, can be accessed and optimized for the most vulnerable and youth, including those from poor communities and women; (ii) risks related to labor and working conditions for project direct and contracted workers; (iii) risk of exposure of youth, including vulnerable youth and women to possible GBV and SEA/SH concerns related to increased touristic activities in the project area and coming of trainers to these communities to train future guides, among them young men and women. The risk on this aspect is relatively moderate whereas residential areas are spread along the route of the Trail. MoTA prepared and disclosed a Code of conduct (CoC) for Tourism in the Holy Land: [http://www.atg.ps/pdf/code\\_of\\_conduct.pdf](http://www.atg.ps/pdf/code_of_conduct.pdf). The CoC for tourism has been developed to inform pilgrims and tourists of the reality of Palestine and Palestinians and to seek their support in using tourism to transform contemporary injustices. At the same time, the Code aims to raise awareness amongst Palestinian tourism stakeholders on how tourism in Palestine can be transformed and enhanced to truly benefit both hosts and visitors. Private sector firms seeking grants to establish new enterprises or subsidiaries will need to demonstrate adherence to willing-buyer willing-seller criteria to qualify.

110. The remaining activities comprising Component 1 include (i) training individuals and communities and promotional campaigns among communities and training of the communities on hygiene practices, cleaning and respecting the environment, training of the communities on English, French, and on other foreign languages (component 1.1), (ii) development of an interactive digital platform for community-based tourism in the West Bank to include all information related to homestays, guest houses, guides, artisan centers, trip itineraries, maps, and contacts (subcomponent 1.3), and (iii) project Management and Administration, Monitoring and Evaluation, and Knowledge Dissemination (Component II). These activities include digital platforms (websites), web applications, innovative application solutions, digital related activities, technical assistance, capacity building, awareness raising among others, which will not require the construction of new physical structures that do not entail pollution generation or raise environmental or social concerns and hence the environmental and social risk related to these

activities is low.

111. The potential negative impacts and risks of the Project are:

- Dust from installation activities relating to renovation and other construction elements;
- Occupational health and safety hazards.
- Increased solid waste generation.
- Hazardous chemicals
- Risk of fire.
- Hazardous driving conditions to the communities along the Trail.
- Labor and poor working conditions.
- Degrading natural and physical integrity, damage the natural habitat and wildlife.
- Social exclusion or inequity in its various forms.
- Exposure of youth, including vulnerable youth and women to possible GBV and SEA/SH concerns.

112. Based on the above, it is anticipated that the adverse environmental and social impacts and risks of the PH Trail Project are likely to be of moderate to low magnitude, with predominance of the former; localized; temporary; reversible; and easily avoided, managed or mitigated with commonly available measures.

**5.3 Mitigation Measures**

113. Mitigation measures involve elimination of impact, or at least minimizing the impact to the lowest level possible. Mitigation measures are related to small civil works for installation of equipment, renovations, refurbishment, etc., workers’ occupational health and safety, waste management, fire hazard, labor and working conditions, community health and safety, degrading natural and physical integrity, social exclusion or inequity, GBV and SEA/SH concerns awareness, institutional support including training, and recruitment of qualified personnel.

114. The mitigation measures for the potential impacts of the project are summarized in the table below. Full list of measures for small civil works and purchase of chemicals are presented in the ESMP Checklist (annex II).

115. PHT will mitigate the environmental and social impacts associated with subproject activities by including environmental and social clauses in all supply, installation/contracts including contracts with beneficiary firms/individuals, enforce compliance with these clauses, and ensuring that contracted staff are familiar with these clauses. Mitigation measures include application of ESMP checklist/ESMP (annex II and III) and apply LMP and SEP (separate documents) for mitigating the labor and working conditions and proper engagement of stakeholders.

Impact and risks	Mitigation measures
light civil works and purchase of chemicals	Mitigation measures are presented in the ESMP Checklist (annex II)
Increased solid waste generation and littering along the PH Trail	Prohibit littering and waste disposal except in designated places Coordinate with LGUs to provide litter bin along the Trail.



	PHT to provide specific trainings of individuals and communities on solid waste generation, littering, cleaning and respecting the environment will take into account the different roles and responsibilities in private and public domains.
Risk of fire	Coordinate with LGUs for firefighting  PHT to provide specific – guidelines – awareness videos of individuals and communities on fire related risks.
Increase human traffic and creation of hazardous driving conditions to the communities	Coordinate with LGUs to employ safe traffic control measures, including way-marking, installation of signages, and traffic diversions in coordination with relevant Local Government Units (LGUs).
Child labor and poor working conditions	Apply LMP (separate document) for mitigating the labor and working conditions including child labor and working conditions- part of the contract - code of conduct
Degrading natural and physical integrity, damage the natural habitat and wildlife	PHT shall: <ul style="list-style-type: none"> <li>• Ensure that the location and design of the upgraded facility is non- obtrusive and integrates safety, sanitation, waste management, etc.</li> <li>• Ensure that the tourism facility has an efficient waste management system that includes: possible resale or disposal in a designated landfill site; and, composting of biodegradable wastes.</li> <li>• PHT will develop guidelines to prevent degrading natural habitats and physical cultural resources</li> <li>• Application of Environmental Guidelines for beneficiary firms/individuals/contractors.</li> </ul>
COVID-19 related risk	PHT will assess exposure risks and ensure precaution measures (Annex V) are in place. PHT applies the Ministry of Health and WHO guidelines regarding protection measures from COVID-19 including social distancing, wearing of masks and ensuring hygiene conditions in place. During project consultation and implementation, human interaction with relevant stakeholders and potential clients will be reduced to the minimum, and COVID-19 protocols for public consultations and stakeholder engagement will be applied by PHT. PHT will make sure that all service providers are trained on MoTA Jahzeen Platform <a href="http://www.jahzeen.ps">www.jahzeen.ps</a>
Elite capture and social exclusion or inequity	PHT shall: <ul style="list-style-type: none"> <li>• Ensure fair competition by ensuring equal opportunity, fair competition can be accessed and optimized for the most vulnerable and youth, including those from poor communities and women by creating a level playing field.</li> <li>• Formulate and finalize the eligibility criteria &amp; beneficiary selection process that will be described in the Project Operation Manual (POM) to be prepared by PHT in a transparent manner in consultation with key stakeholders.</li> <li>• Ensure access to information and transparency in decisions,</li> </ul>

	<p>undertake public consultation and information dissemination.</p> <ul style="list-style-type: none"> <li>• Operational GM for the public (project GM) will be ensured to raise any concerns regarding beneficiary selection within a set time period before finalizing the beneficiaries.</li> <li>• Create awareness on the GM.</li> </ul>
<p>Community health and safety</p> <p>Exposure of youth, including vulnerable youth and women to possible GBV and SEA/SH concerns</p>	<ul style="list-style-type: none"> <li>▪ Assess and manage the risks of GBV, SEA/SH in the GM system.</li> <li>▪ GBV, SEA/SH, Child protection training/awareness campaign for communities.</li> <li>▪ Promote two-way communication between PHT and communities that would allow information on instances of SEA/SH to surface and inform strengthening of SEA/SH measures as needed.</li> <li>▪ Guarantee confidentiality and a survivor-centered approach for SEA/SH grievances.</li> </ul>
<p>Grievance Mechanism (GM)</p>	<ul style="list-style-type: none"> <li>▪ The beneficiary firm/individual or the contractor responsible for implementation of the small civil works shall have workers' GM. The workers shall have access to the GM to raise concerns related to the work environment.</li> <li>▪ PHT shall have project GM.</li> </ul>

## **CHAPTER SIX: THE ENVIRONMENTAL AND SOCIAL RISK SCREENING PROCESS FOR SUB-PROJECTS**

### **6.1 Introduction**

116. The environmental and social screening will take place at an early stage of the subproject cycle. It will be the instrument and assist in excluding any sub-project that might have high or substantial risk classification. The list of negative sub-project attributes which would make a sub-project ineligible for support includes any activity that would adversely impact biodiversity conservation and natural resources, cultural heritage, and restrictions on land use and involuntary Resettlement. The final selection of the sub-projects and activities to be financed will take place during appraisal, and specific criteria for their selection and financing will be identified in the project operational manual (POM).
117. All Community Development activities that the project will support should be commercially feasible. No new construction will be made except small civil works for installation of equipment, renovations, refurbishment to be carried out in livelihood facilities. No removal of trees will take place. Also, a cluster approach, through which the communities will be grouped, will be adopted in the implementation of the activities to strengthen the linkages among communities and their working together.

### **6.2 Application of the Screening processes**

118. An Environmental Assessment (EA) is a process aiming at recognizing aspects of a particular activity that can produce risks for the environment and human health, predicting, evaluating and mitigating its potential impacts making sure they are minimized, if elimination is not feasible, and compensated for. The purpose of EA is to improve quality of decision-making by recognizing environmental impacts/consequences early in the sub-project preparation process, so that they can be incorporated into the sub-project design as well as timely prevented or mitigated in the implementation and operation phases.
119. The scope of environmental assessment depends on the environmental risks relevant to each sub-project, the scope of the sub-project activities as well as features of the sub-project location. The purpose of environmental assessment is to identify ways of environmentally improving the proposed activities by minimizing, mitigating, or compensating for their adverse impacts. EA, for the purposes of this and other projects supported by the WB, include Occupational Health and Safety (OHS) risks as well as risks related to preservation of cultural physical heritage (chance findings in this case). EA results are presented in the environmental assessment report, reflected in identified environmental risks (related to specific types of sub-project activities) and coupled with adequate measures. The measures present methods, techniques, procedures and other ways of improving sub-projects environmentally by minimizing, mitigating or compensating for adverse impacts. An EA also describes the steps that were taken for public consultation.
120. EAs envisaged for activities under this project are ESMP Checklist and ESMP. Draft ESMP Checklist template for small civil works that are expected to be the most project related activity is prepared as an integral part of ESMF and available in the Annex II. ESMP Checklist template (containing mitigation measures and monitoring plan) will be adjusted to each individual civil works sub-project envisaged in the Checklist. In addition, it will define supervision and reporting responsibilities and the timeline. ESMP will be produced for all other sub-projects and activities that have not been envisaged by the ESMP

Checklist but may produce potential negative impacts to the environment or human health.

### 6.3 The Screening Process

121. All sub-projects under the sub-grant scheme as well as all activities that include physical investments or may have negative environmental impacts will undertake the environmental screening process presented below:

**STEP 1:** The Sub-grant Applicants (beneficiary firms/individuals) prepare and submit an initial sub-project design under the call for proposal together with the Environmental Risk Assessment Questionnaire (available in Annex I). PHT is responsible for the quality and validity of information presented in the Environmental Risk Assessment Questionnaire and follow-up EAs, and ensures that the disclosure and consultation requirements are conducted as per the guidelines provided in this ESMF. PHT screens the sub-projects in line with the ESMF (and based on design, Environmental Risk Assessment Questionnaire and other information) screens out sub-projects that are of high or substantial risk, on exclusion lists, ineligible and forms a list of successful Applicants. The M&EO at PHT prepares Screening Reports of follow-up requirements and EA required for sub-grant processing (a site-specific ESMP or ESMP Checklist, templates available in annex II and III. Aggregate Screening results are communicated to the WB. At this time, it is the responsibility of the beneficiary firm/individual to fulfill any local and national environmental and other requirements, construction permit and/or other official approval/permits), if and as needed.

**STEP 2:** The Applicants (beneficiary firms/individuals) prepare EA (ESMP or ESMP Checklist) with guidance and help from the PHT and submit to PHT for review and approval. The M&EO at PHT provides comments. The beneficiary firm/individual also fulfills national and local regulation requirements, if applicable.

**STEP 3:** If requested, the Applicants (beneficiary firms/individuals) revise the ESMP/ESMP Checklist in line with PHT comments/requirements (and consults with PHT when necessary) and resubmit. PHT approves EA when satisfied with the quality and compliance with ESMF and national regulation. ESMP Checklists and all site-specific ESMPs are a subject to WB approval.

**STEP 4:** All EAs will be consulted upon in accordance with WB ESF, specifically ESS10 (as defined in the chapter Disclosure and Consultations).

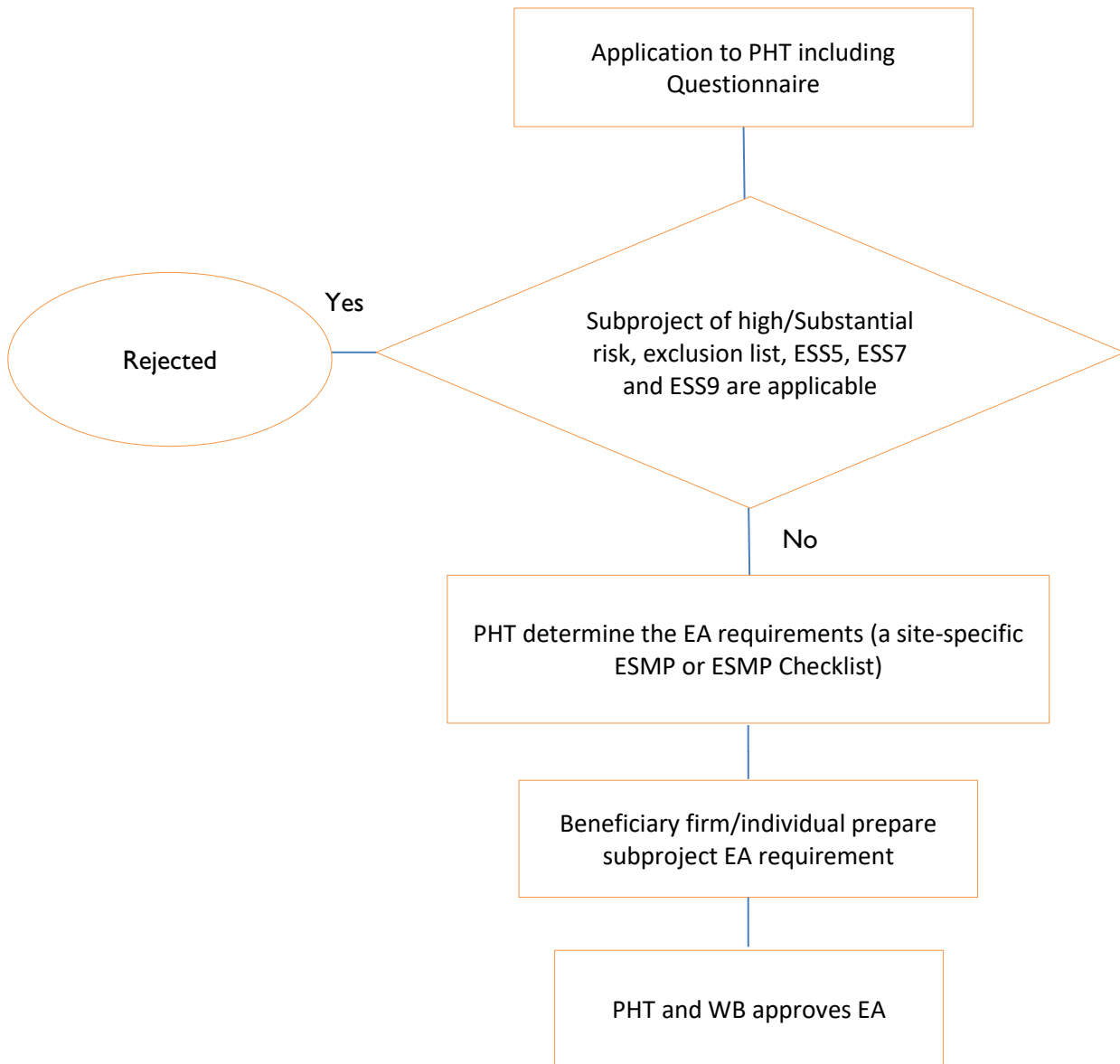
**STEP 5:** The Applicants (beneficiary firms/individuals) incorporate the relevant consultation comments into the EA upon which the document is final. The recommendations provided in the assessment are further reflected in the sub-project design and implementation plan, including associated estimated costs. The contract with the beneficiary firm/individual cannot be signed prior to finalization of the EAs (ESMP and ESMP Checklist) which becomes a part of bidding and contracting documentation for procuring and implementation of the works.

**STEP 6:** The Contractor implements EA. The beneficiary firm/individual procuring the works, monitors the implementation of the EA mitigation measures and monitoring plan and regularly reports to the M&EO at PHT. PHT supervises the EA implementation (including making site visits) and reports to WB in EA implementation and project progress reports (and ESMP implementation reports for specific projects if previously agreed with the WB ES Specialist), in accordance to the reporting schedule.

#### **6.4 Project Implementation**

122. PHT including the ESO, will be responsible to ensure that project beneficiary firms/individuals are familiar with ESF including ESMP checklist, ESMP, LMP and SEP and on the compliance with the plan.
123. The sub-project screening, assessment and preparation and approval of EA requirement are as mentioned above and depicted in the chart below.
124. Detailed presentation of the status of environmental and social performance under the project cycle will be included in the progress reports during its implementation. Reports will present overview of deviations/violations of the E&S requirements encountered over the reporting period including instructions given for addressing non-compliance and identified issues, and follow-up actions on the revealed outstanding matters.
125. The following chart 1 summarizes guidelines for the assessment of the potential environmental and social impacts of the potential sub-projects and the preparation of the EA.

#### **Chart 1: Project Implementation Chart**



## CHAPTER SEVEN: PUBLIC CONSULTATION

### 7.1 Rationale for Consultation and Disclosure

126. Public consultations are critical in preparing effective and sustainable sub-projects activities. This requirement supports the participatory planning process as required by the World Bank and the national environmental assessment regulations. It is important that beneficiaries are involved in the project cycle, from the screening process to implementation and monitoring. The same applies to relevant stakeholders.
127. For sub-project activities, the first step is to hold consultations with all PAPs and OIPs during the screening process, when preparing the site-specific ESMP. Consultations with stakeholders should be conducted according to the SEP.
128. To facilitate meaningful consultations, PHT should provide all the relevant material and information in a timely manner, and in a form and language that are understandable. The location of the relevant documents should be advertised through commonly used media. Depending on the public interest in the potential impacts of the sub projects, a consultation session may be required to better convey concerns.
129. To fulfill the requirements of ESS10, PHT has prepared Stakeholder Engagement Plan (SEP). The purpose of SEP is to explain how Stakeholder engagement will be practiced throughout the project life cycle and which methods will be used as part of the process; as well as to outline the responsibilities of PHT in the implementation of stakeholder engagement activities. Stakeholder engagement shall be carried out in compliance with the Technical Note on Public Consultations and Stakeholder Engagement in WBG-supported operations during COVID-19 ([https://biwta.portal.gov.bd/sites/default/files/files/biwta.portal.gov.bd/page/f3ca1ff6\\_95b0\\_4606\\_849f\\_2c0844e455bc/2020-10-01-11-04-717aa8e02835a7e778b2fff46f531a8c.pdf](https://biwta.portal.gov.bd/sites/default/files/files/biwta.portal.gov.bd/page/f3ca1ff6_95b0_4606_849f_2c0844e455bc/2020-10-01-11-04-717aa8e02835a7e778b2fff46f531a8c.pdf)). A detailed description of the consultation activities is provided in the SEP prepared for the project. SEP will be updated based on the prepared SEP as soon as the specific project component/sub-projects, stakeholder groups, and schedule of activities are known.
130. The PHT will disclose on their websites (<http://www.phtrail.org>), project information and all key documentation, including ESMF, ESMP, LMP, SEP to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The information will be disclosed in local language, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, women, mobility, differences in language or accessibility).
131. The disclosure should include information on: (i) stakeholder engagement process, highlighting the ways in which stakeholders can participate; (ii) time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported and; (iii) the process and means by which grievances can be raised and will be addressed.

## **CHAPTER EIGHT: INSTITUTIONAL ARRANGEMENTS AND CAPACITY BUILDING REQUIREMENTS**

### **8.1 Institutional Arrangement and Responsibilities**

132. The PHT will be responsible for implementing the project activities. PHT will be responsible for defining the eligibility criteria for the selection of beneficiaries and finalizing the beneficiary list. After selecting the beneficiaries, the PHT will sign sub-project grant agreements with the beneficiaries.

### **8.2 Institutional arrangements for Implementation of the ESMF**

133. The PHT will be responsible for full implementation of the ESMF and the compliance thereof. The M&EO to be hired at PHT and the E&S consultant with ESF experience that will be hired on a part-time basis will take the lead responsibility in ensuring implementation of all steps presented in the ESMF, the LMP and the SEP. The M&EO and the E&S consultant will also be responsible for monitoring and reporting on compliance of due diligence mechanisms set forth in the ESMF and preparation of quarterly compliance summaries and formally communicating to the World Bank on environmental and social safeguard matters. In addition, the M&EO and the E&S consultant are expected to create awareness and any staff training necessary for effective implementation of the ESMF.

### **8.3 Capacity Building and Environmental Trainings**

134. Even though PHT has great technical capacity, it has no environmental and social expert. Therefore, there is a need to assign/recruit Monitoring and evaluation Officer (M&EO) and the E&S consultant at PHT and provide them with necessary capacity building to ensure that the ESMF is effectively prepared and implemented. The M&EO and the E&S consultant will be exposed to formal training in the management of environmental and social issues. The training program to be done by the World Bank environmental and social safeguard team will include an orientation program on ESF, ESMF, LMP, SEP, environmental assessment processes, monitoring and evaluation (M&E), OHS, waste management, and participatory methodologies. Capacity building will help improve the effectiveness of stakeholders' engagement in management of environmental and social impacts during planning, implementation and operation of proposed sub-projects. The capacity building and training shall also invite officers of the MoTA, interested private sector parties, and stakeholders; an interesting subject for the stakeholders would be environmental monitoring and reporting.

135. Capacity building will enhance the ESMF management capacity by allowing real application of the critical practices such as the following:

- Screening of investments for potential environmental and social impacts, assigning mitigation measures, public consultation; steps 1-6 to implement the environmental and social screening process for projects;
- Management of impacts during implementation; monitoring of effectiveness of measures;



- Monitoring and grievance redress.

#### 8.4 Financial Implications

136. The quantities, specifications and estimated costs of designed measures to avoid or mitigate negative impacts of each project component site will be assessed by the beneficiary firm staff/individual together with their M&EO and incorporated into bidding/procurement documents. The contractor/supplier will execute all required works and reimbursed through pay items in the bill of quantities financed by the project.

137. The cost expected under this ESMF will be for hiring the ESO. The Table below summarizes the estimated costs and schedules for the items associated with the implementation of the ESF. The budget for the SEP is estimated to be US\$40,000 as determined in the SEP and included in the costing table below. The M&EO will also be responsible for the implementation of the SEP. The M&EO will review the SEP every six months to determine if any changes to stakeholder categories or engagement activities are required. The budget will be revised accordingly.

Item	Schedule	Cost (US\$)
Implement ESMF	Throughout project implementation	No additional cost, this is embedded in M&EO and E&S specialist cost
Site specific ESMP checklists/ESMP	Throughout project implementation	No additional cost, this will be carried out by the beneficiary firm/individual
Recruit M&EO	Full-time M&EO (of which 40% of his time will be allocated for the E&S due diligence) throughout project Implementation	4 years @ 24,000 USD per year @ 40% of his time for the E&S due diligence (96,000x0.4= US\$38,400)
Recruit E&S Consultant	Part-time E&S consultant throughout project Implementation	160 days @ 12,800
Capacity Building (MoTA, Private sector, CBOs, CSO, others stakeholders)	During project implementation	No additional cost, this is embedded in M&EO and E&S specialist cost
Implementation SEP	Throughout project implementation	US\$ 42,400
E&S Audit	Mid-term and end of project implementation	No Additional cost
Total		US\$ 93,600

## **CHAPTER NINE: ENVIRONMENTAL AND SOCIAL MONITORING**

### **9.1 Environmental and Social Monitoring and Responsibilities**

138. Environmental and social monitoring will be an integral part of the PHT supervisory work during the project implementation. The concerned sub-project owner will monitor the contractor works and PHT will conduct regular on-site monitoring of works to verify adherence to the requirements set out in the ESMP checklist/ESMP.
139. Environmental monitoring describes the processes and activities that need to take place to characterize and monitor the environmental and social issues of the sub-project. The objectives for monitoring are to: (i) keep the record of environmental impacts resulting from the sub-project activities and to ensure implementation of the “mitigation measures” identified earlier, (ii) alert project implementation team by providing timely information about any recommended changes that deemed necessary, if and when required; and (iii) make a final evaluation in order to determine whether the mitigation measures designed into the sub-projects have been successfully implemented.

### **9.2 Monitoring, evaluation and reporting Guidance**

140. Monitoring, evaluation and reporting on environmental issues will be part of project implementation processes and reporting systems. The sub-project owner will submit a quarterly progress report to the PHT through the ESO. This report will necessarily address environmental and social issues relevant to the sub-project. M&EO at PIA will keep records of all activities that will be undertaken in the sub-project sites, which will be compiled and used in enhancing environmental sustainability of the sub-project sites. The M&EO will carry out environmental and social compliance monitoring in accordance to the ESMP checklist/ESMP as well as to assess general environmental management/performance. Compliance to environmental and social requirements will be generated based on quarterly reports, annual reports, evaluation reports, feedback meetings and Implementation support missions. PHT will regularly report to the Bank on the status of environmental and social management of projects in the project’s Quarterly Reports.

### **9.3 Environmental Monitoring Indicators**

141. Following are some of the parameters and indicators that provides evidence of efficient environmental management and monitoring programs or of the state or condition of the environment that could result from sub-projects that would be implemented.
- Are periodic monitoring reports being completed?
  - Are processes defined in the ESMF working well?
  - How many complaints/grievances have been received regarding the project?
  - How many employees have received GBV/SEA/SH awareness training at work site?
  - How many staff and other personnel have completed environmental and social training?
  - How many cases have contravened health and safety procedures?
  - How many awareness sessions have been conducted?
  - How many consultations have been conducted?

**ANNEXES**

**Annex I – Environmental and Social Risk Assessment Questionnaire for Project Activities including the Small Works**

**Name of the subproject:**

No.	Environmental Risk Questions	Yes/No	Not Known	Details/Notes
1	What type of works will be contracted for subproject activities?			
2	Will there be only repair slight work/rehabilitation/renovation/refurbishment of buildings other small-scale civil works or other type of activities?			
3	Will the installation of equipment or other small correction going to take place under the subproject and what nature?			
4	I If planning to use existing premises, please provide detailed description of current ownership and use. II Does the building have the relevant use permit? III Will a new use permit be needed for new/changed use?			
5	IV Will all civil works take place on public land? V Will the subproject require use of land that is currently occupied or regularly used for productive purposes (e.g. gardening, farming, pasture, fishing locations, forests)? VI Will the subproject require use of public land that is currently used informally for living or commercial purposes (e.g., informal occupants or businesses)?			
6	Is there a right of way issue or need for permanent land acquisition of private land?			
7	Will the project require temporary use of private land (e.g. for storing material during construction)?			
8	If the subproject is a part of planned new infrastructure, please provide description which and how.			
9	Is the subproject located in the protected area?			
10	Are any protected species using the area anytime of the year (whether a protected area (PA) or not)?			
11	What type of protected area (PA)? (level, and reason for protection)			
12	Is the subproject located in or potentially affects archeological or cultural heritage site?			

<b>13</b>	Is the nature of the site: <ul style="list-style-type: none"> <li>○ Urban/rural,</li> <li>○ Agricultural,</li> <li>○ Industrial,</li> <li>○ Other specific – please specify in the ‘Notes’ column?</li> </ul>			
<b>14</b>	Does the subproject require environmental permits, EIA or other type of EA under the national legislation?			
<b>15</b>	Does the subproject require specific public consultations under the national legislation?			
<b>16</b>	Is generation of larger quantities of hazardous waste (asbestos, compact fluorescent lamps, lead paint debris, oil/fuel- contaminated equipment such as old boilers or diesel tanks, etc.) or special types of waste (radioactive lighting rods) expected as a result of the subproject?			
<b>17</b>	Will there be a procurement of chemicals?			
<b>18</b>	Will there be a use of pesticide?			
<b>19</b>	Other remarks/issues			

Any subproject listed within the exclusion list will not be financed by the Project.

## Annex II – Environmental and Social Management Plan Checklist Template

### 1. Introduction

The project aims to combat unemployment and creates jobs, especially among marginalized groups (women and youth) in rural communities, promotes investments by the private sectors and reinforces linkages among the actors of the experiential tourism value chain. The project will achieve this through two components:

1. Community Driven Development
2. Project Management and Administration, Monitoring and Evaluation, and Knowledge Dissemination

Project's soft activities such as trainings of communities to improve community-based tourism experiences, within community" activities including creating inter-community walks, training individuals and communities and promotional campaigns among communities, training on hygiene practices, cleaning and respecting the environment, and on English, French, and on other foreign languages, awareness and promotion to target domestic and foreign visitors; training on dynamics of entrepreneurship and skills for managing businesses, accounting and financial literacy, support for business registration, quality certification, branding are not expected to have any negative environmental impacts. Other project activities under component 1 envisage small scale civil works such as renovations, refurbishment, installation of equipment, planting trees, marking of the tourism Trail activities. This ESMP Checklist is providing environmental measures and monitoring plan for these works addressing typical and localized impacts.

### 2. Potential environmental impacts

The overall environmental impacts of the Project are expected to be of manageable, temporary and of local impact as they are related to small scale civil or earthworks mainly in urban and rural areas and the use of chemicals in the soap making process during the operation phase. These impacts most commonly include but are not limited to: a) Noise due to demolition, rehabilitation works, installation or operation of equipment; b) Management of construction wastes or waste during operation c) risks related to occupational health and safety.

### 3. Sub-project activities and environmental impacts

#### 4. Checklist ESMP

Checklist ESMP is applied for minor rehabilitation/renovation/refurbishment or small-scale civil works. It provides "pragmatic good practice" and it is designed to be user friendly and compatible with WB safeguard requirements. The checklist-type format attempts to cover typical mitigation approaches to common civil works contracts with localized impacts. The checklist has one introduction section and three main parts:

- Introduction or foreword part in which the project is introduced, environmental category defined, and checklist ESMP concept explained.
- **Part 1** constitutes a descriptive part ("*site passport*") that describes the project specifics in terms of physical location, the institutional and legislative aspects, the project description, inclusive of the need for a capacity building program and description of the public consultation process.
- **Part 2** includes the environmental and social screening in a simple Yes/No format followed by mitigation measures for any given activity.

- **Part 3** is a monitoring plan for activities during project construction and implementation. It retains the same format required for standard World Bank ESMPs. It is the intention of this checklist that Part 2 and Part 3 be included as bidding documents for contractors. ESMP Checklist (Parts 1-3) will be updated and supplemented for each sub-project as needed to comply with the ESMF.

**5. Application of the ESMP-Checklist**

The design process for the envisaged civil works under the Project will be conducted in three phases:

- 1) *General identification and scoping phase*, in which locations for interventions are selected and an approximate program for the potential work typologies elaborated. At this stage, Part 1, 2 and 3 of the Checklist ESMP are filled. Part 2 of the Checklist ESMP can be used to select typical activities from a “menu” and relate them to the typical environmental issues and mitigation measures.
- 2) *Detailed design and tendering phase*, including specifications and conditions. ESMP Checklist is revised according to the known design details at this stage. This phase includes the tender and award of the works contracts. The whole filled in tabular ESMP (Part 1, 2 and 3) should be additionally attached as integral part to the works contract, analogous to all technical and commercial terms, has to be signed by the contract parties.
- 3) *During the works implementation phase*, environmental compliance is checked on the respective site by the beneficiary firm/individual, which include the ESO. The mitigation measures in Part 2 and monitoring plan in Part 3 are the basis to verify the Contractor’s compliance with the required environmental provisions.

**6. Monitoring and Reporting**

For the monitoring of the Contractor’s safeguards due diligence, the beneficiary firm/individual works with Part 3 of the ESMP Checklist, i.e. with the monitoring plan. Part 3 is developed site specifically by the user of funds and in necessary detail, defining clear mitigation measures and monitoring which can be included in the works contracts, which reflect the status of environmental practice on the construction site and which can be observed/measured/ quantified/verified by the inspector during the construction works. Part 3 would thus be updated and revised during the design process to practically reflect key monitoring criteria which can be checked during and after works for compliance assurance and ultimately the Contractor’s remuneration.

<b>PART 1: INSTITUTIONAL &amp; ADMINISTRATIVE</b>		
Project title		
Scope of project and activity		
Institutional arrangements (Name and contacts)	<b>Project management</b>	
Implementation arrangements (Name and contacts)	<b>Supervision</b>	
<b>SITE DESCRIPTION</b>		
Name of site		
Describe site location		Annex 1: Site information (figures from the site) [ ]Y [ ] N

Who owns the land?		
Geographic description		
<b>LEGISLATION</b>		
Identify national & local legislation & permits that apply to project activity		
<b>PUBLIC CONSULTATION</b>		
Identify when / where the public consultation process took place		
<b>INSTITUTIONAL CAPACITY BUILDING</b>		
Will there be any capacity building?	[ ] N or [ ] Y	

<b>PART 2: ENVIRONMENTAL /SOCIAL SCREENING</b>			
	<b>Activity</b>	<b>Status</b>	<b>Additional references</b>
Will the site activity include/involve any of the following?	A. General requirements for all works	[ ] Yes [ ] No	See Section <b>A</b> below
	B. Rehabilitation/Renovati on/refurbishment/small civil works	[ ] Yes [ ] No	See Section <b>A, B, C</b> below
	C. Purchase of chemicals	[ ] Yes [ ] No	See Section <b>A, D</b> below

<b>ACTIVITY</b>	<b>PARAMETER</b>	<b>MITIGATION MEASURES CHECKLIST</b>
<b>A. General Conditions</b>	Notification and Worker Safety	a. All needed permits/opinions/permissions are obtained before the commencement of works (including construction and other); b. All work will be carried out in safe and disciplined manner; c. Workers personal protective clothes and equipment are available in sufficient quantities and are worn/used at all times; d. Workers must be certified and experienced for the work they are performing (e.g. for works in heights); e. Marking out the site for temporal storage of the construction material near the site;

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		<ul style="list-style-type: none"> <li>f. Providing warning tapes, fences and appropriate signage informing danger, key rules and procedures to follow;</li> <li>g. Forbidden entrance of unemployed persons within the warning tapes and fences when/where deemed needed;</li> <li>h. Machines should be handled only by experienced and appropriately trained personnel, thus reducing the risk of accidents;</li> <li>i. All workers must be familiar with the fire hazards and fire protection measures and must be trained to handle fire extinguishers;</li> <li>j. First aid kits should be available on the site and personnel trained to use it.</li> <li>k. Procedures for cases of emergency (including spills, accidents, etc.) are available at the site.</li> <li>l. Sanitary facilities (toilets) must be provided for workers.</li> <li>m. Purchased equipment will be installed and used respecting all safety measures prescribed by the producer of equipment and best practices.</li> </ul>
	Noise	<ul style="list-style-type: none"> <li>a. In urban/rural residential area, the level of noise should not exceed 55dB during the day and evening and 45dB during the night</li> <li>b. The construction work will not be permitted during the nights, the operations on site shall be restricted from 7.00h to 19.00h.</li> <li>c. During the operations the engine covers of generators, air compressors and other powered mechanical equipment should be closed.</li> </ul>
	Water and Soil Quality	<ul style="list-style-type: none"> <li>a. Prevent hazardous spillage coming from waste (temporary waste storage should be leakage protected and those for hazardous or toxic waste equipped with secondary containment system, e.g. double walled or banded containers).</li> <li>b. If hazardous spillage occurs, curb and remove it, clean the site and follow procedures and measures for hazardous waste management.</li> <li>c. Install/provide and maintain of proper sanitary facilities for workers. The wastewater from these sources should be transported to proper waste water treatment facilities.</li> <li>d. Water, and other components, in concrete mixture shall be clean and free of harmful chemicals.</li> </ul>



ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
	OHS	<ul style="list-style-type: none"> <li>a. Conduct a risk assessment of site safety hazards where equipment will be installed, and design and implement measures specific to identified hazards. Train users on specific hazards associated with the equipment operation.</li> <li>b. Respect all safety measures required for operation of equipment</li> <li>c. Provide workers with protective personal equipment</li> <li>d. Prepare an Emergency Response Plan (ERP)</li> <li>e. Apply OHS Requirements including commitment to the Ministry of Health and WHO guidelines regarding protection measures from COVID-19 pandemic including but not limited to: social distancing between workers, provision of full PPE for workers including face mask, orientation for workers about how to deal with different issues during the emergency situation under COVID-19.</li> </ul>
	Waste management	<p>The good waste management practice will be applied including:</p> <ul style="list-style-type: none"> <li>a. Identification of the different waste types that could be generated at the construction site</li> <li>b. Containers for each identified waste category are provided.</li> <li>c. Waste collection and disposal pathways will be identified for all waste types expected from construction activities. For management of hazardous wastes, instructions/guidelines from EQA will be followed.</li> <li>d. Discarding any kind of waste (including organic waste) or waste water to the surrounding nature or water-bodies is strictly forbidden.</li> </ul>
	Soil erosion	<ul style="list-style-type: none"> <li>a. In the case of spills, the polluted water must be contained to prevent further contamination and transported to a waste water treatment plant</li> </ul>
	Chance findings of archaeological any cultural and historical artefacts	<ul style="list-style-type: none"> <li>a. Working area should be located away from the heritage and archeological sites.</li> <li>b. Adequate care shall be taken to enlighten construction workers on the possible unearthing of archeological relics;</li> <li>c. Works will be stopped, responsible authorities notified in line with the national regulation and their instructions followed. Works will start again only once relevant authorities have provided their guidance and clearance.</li> </ul>

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
	Emergency preparedness	<ul style="list-style-type: none"> <li>a. Emergency Preparedness Plan is prepared and communicate it to the employees.</li> <li>b. Ensure familiarity with networks in the proximity of the site.</li> <li>c. In case of accidental disruption, immediately stop all works, notify proper authorities in the region and emergency remediation of damaged network in line with the requirements of the national legislation and Emergency Preparedness Plan.</li> <li>d. Provide firefighting equipment and training for employees</li> </ul>
<b>B. Rehabilitation/ Renovation/refurbishment/small construction activities</b>	Community safety	<ul style="list-style-type: none"> <li>a. Ensure safety of building users e.g. provide safe passages and protection from falling objects.</li> <li>b. Timely inform users of premises and neighboring communities of upcoming works.</li> </ul>
	Nature protection	<ul style="list-style-type: none"> <li>a. Disturbance of animals, collection of herbs and forest food is strictly prohibited.</li> <li>b. Open fires are strictly forbidden.</li> <li>c. There will be no littering.</li> <li>d. Before works, the area must be checked for dens and nests.</li> <li>e. Minimize the working area and use only what is necessary.</li> <li>f. All waste and other materials must be removed by the end of works.</li> </ul>
	Affects forests and/or protected areas	<ul style="list-style-type: none"> <li>a. All recognized natural habitats and protected areas in the immediate vicinity of the activity will not be damaged or exploited, all staff will be strictly prohibited from hunting, foraging, logging or other damaging activities.</li> <li>b. For large trees in the vicinity of the activity, mark and cordon off with a fence large trees and protect root system and avoid any damage to the trees.</li> </ul>
<b>C. Purchase and use of chemicals during the operation phase</b>		<ul style="list-style-type: none"> <li>c. Chemicals are purchased from the licensed distributor only.</li> <li>d. Chemicals are placed in safe and secured place safe from spilling.</li> <li>e. Ensure workers are familiar with safety regulations and storage requirements for each product.</li> <li>f. Provide absorbents for spills at site. In the case of an accident curb the spill and remediate the site. Waste is to be treated as hazardous.</li> <li>g. Follow Hazardous Waste Management Guidance (annex IV) when handling chemicals.</li> </ul>

<b>ACTIVITY</b>	<b>PARAMETER</b>	<b>MITIGATION MEASURES CHECKLIST</b>
Does the subproject have a GM in place, to which all workers have access, designed to respond quickly and effectively?	GM system	a. Apply ESMP, SEP
Are there any communities or vulnerable groups present in the subproject area and are likely to be affected by the proposed subproject negatively or positively?	Community safety	a. Apply ESMP, SEP

**PART 3: MONITORING PLAN**

<b>Phase</b>	<b>What</b> (Parameter will be monitored?)	<b>Where</b> (Is the parameter to be monitored?)	<b>How</b> (Is the parameter to be monitored?)	<b>When</b> (Define the frequency / or continuity?)	<b>Why</b> (Is the parameter being monitored?)	<b>Cost</b> (If not included in project budget)	<b>Who</b> (Is responsible for monitoring?)
Preparation	All required permits are obtained before works start.	At the city administration	Inspection of all required documents	Before works start	To ensure the legal aspects of the rehabilitation activities	/	Beneficiary firm/Individual Supervision: PHT
	Work safety and Safety measures for workers, employees and visitors	On site	Visual checks and reporting	Before works start	To prevent health and safety risks – mechanical injures and to provide safe access and mobility	/	Beneficiary firm/Individual Supervision: PHT
Implementation	Work safety	On site	Visual checks and reporting Unannounced inspections during work	Random checks	To prevent health and safety risks – mechanical injures and to provide safe access and mobility	/	Beneficiary firm/Individual Supervision: PHT
	Site is well organized: fences, warnings, sign postage in place.	On site	Inspection	Random checks	To prevent accidents /	/	Beneficiary firm/Individual Supervision: PHT
	Collection, transport and hazardous waste (if any)	At the safe temporary location on construction site in separate waste containers	Inspection of the conditions of the containers and storage space	Random checks	To ensure proper waste management / Hazardous waste does not be dispose to any landfill	/	Beneficiary firm/Individual Supervision: PHT
	Collection, transport and final disposal of the solid waste	At and around the site	Visual monitoring and inspection of the transport lists of the contractor	Random checks	Do not leave the solid waste on the construction site and to avoid negative impact	/	Beneficiary firm/Individual Supervision: PHT

<b>Phase</b>	<b>What</b> (Parameter will be monitored?)	<b>Where</b> (Is the parameter to be monitored?)	<b>How</b> (Is the parameter to be monitored?)	<b>When</b> (Define the frequency / or continuity?)	<b>Why</b> (Is the parameter being monitored?)	<b>Cost</b> (If not included in project budget)	<b>Who</b> (Is responsible for monitoring?)
					to the local environment and the local inhabitant's health		
	Level of noise	At and around the site	Monitoring on the level of noise dB (with suitable equipment)	Upon complaint or inspection finding	To determine whether the level of noise is above or below the permissible level of noise	/	Beneficiary firm/Individual Supervision: PHT

### **Annex III – Environmental and Social Management Plan Template**

A project's environmental and social management plan (ESMP) consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation to eliminate adverse environmental and social impacts, offset them, or reduce them to acceptable levels. The plan also includes the actions needed to implement these measures.

Management plans are essential elements of EA reports for moderate risk projects; for many projects with moderate risk the EA may result in a management plan only. To prepare a management plan, the recipient and its EA design team (a) identify the set of responses to potentially adverse impacts; (b) determine requirements for ensuring that those responses are made effectively and in a timely manner; and (c) describe the means for meeting those requirements. More specifically, the ESMP includes the following components:

#### **a. Mitigation**

The ESMP identifies feasible and cost-effective measures that may reduce potentially significant adverse environmental impacts to acceptable levels. The plan includes compensatory measures if mitigation measures are not feasible, cost-effective, or sufficient. Specifically, the ESMP;

- Identifies and summarizes all anticipated significant adverse environmental impacts;
- Describes with technical details each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate; and
- Estimates any potential environmental impacts of these measures.

#### **b. Monitoring**

Environmental monitoring during project implementation provides information about key environmental aspects of the project, particularly the environmental impacts of the project and the effectiveness of mitigation measures. Such information enables the recipient and the Bank to evaluate the success of mitigation as part of project supervision, and allows corrective action to be taken when needed. Therefore, the ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the EA report and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

#### **c. Implementation Schedule and Cost Estimates**

For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.

**d. Mitigation Plan**

Construction Phase					
Activity	Expected Environmental Impact	Proposed Measure for Mitigation	Responsibility for Implementing Mitigation Measure	Period of Implementing Mitigation Measure	Cost associated with implementation of mitigation measure
1.					
2.					
...					
Operation Phase					
1.					
2.					
...					

**e. Monitoring Plan**

Construction Phase					
<b>What</b> <i>Parameter is to be monitored?</i>	<b>Where</b> <i>Is the parameter to be monitored?</i>	<b>How</b> <i>Is the parameter to be monitored (what should be measured and how)?</i>	<b>When</b> <i>Is the parameter to be monitored (timing and frequency)?</i>	<b>By Whom</b> <i>Is the parameter to be monitored– (responsibility)?</i>	<b>How much</b> <i>is the cost associated with implementation of monitoring</i>
1.					
2.					
....					
Operation Phase					
1.					
2.					
....					





following information where applicable

Incident Summary

**Specific Details**

Date Time Place

Persons Involved

Name/s Age/s Experience

Date joined Company Last Medical Check

Current Medical Treatment Evidence of Drugs/Alcohol Last Safety Meeting attended

Infringements/Incidents record

Equipment Involved

**Description of Incident**

**Findings of Investigation Team Interim/Final**

Investigation Team Members Persons Interviewed

Recommendations & Remedial Actions Investigation Methodology

Signature (Name, Title, Date):

**Attachments**

Photographs

Witness Statements and Incident Notification Report

**Annex IV: Hazardous Waste Management Guidance****Hazardous waste management Guidance consists of the following:**

- a) Any hazardous generated as a result of any activity during operation 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.
- b) 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. A written permission for transporting the hazardous waste to registered treatment facility should be issued by EQA.
- c) Transboundary of hazardous waste is not allowed unless a written permission is issued by EQA. The permission complies with Basel convention requirements.
- d) A hazardous waste record keeping should be created and checked by M&EO from time to time to make sure that hazardous waste is well managed.
- e) Existing technical facilities for treating and disposing of hazardous waste should be assigned before the start of the work.
- f) For emergency cases, all workers expected to be in contact with hazardous waste should be trained for safe handling of hazardous waste.
- g) All workers should be familiar with hazardous waste warning signs.

**Annex V: COVID-19 Precautions' List for Employees and Workers**

Know the Symptoms of COVID-19:

- Coughing, fever, shortness of breath, and difficulty breathing.
- Early symptoms may include chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose. If you develop a fever and symptoms of respiratory illness, **DO NOT GO TO WORK** and call your health-care provider immediately. Do the same thing if you come into close contact with someone showing these symptoms.

**Contractor teams shall abide to health and safety measures as follows.**

- Contractor shall ensure all of their teams are covered with insurance, and having access to health care system. Once one's health is compromised; the contractor needs to ensure the worker health has been checked by MOH, and their recommendations adhered to.
- Access to the job site and work trailer will be limited to only those necessary for the work.
- All visitors will be pre-screened to ensure they are not exhibiting symptoms.
- Employees and visitors will be asked to leave the job site and return home if they are showing symptoms.
- Provide hand sanitizer and maintain Safety Data Sheets of all disinfectants used on site.
- Provide protective equipment (PPE) including face masks, gloves, etc. to any employees/workers and visitors and keeping the right distance in offices and outside.
- Clean and disinfect frequently used tools and equipment on a regular basis. This includes other elements of the jobsite where possible. Employees should regularly do the same in their assigned work areas.
- Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.
- Avoid sharing tools with co-workers. If not, disinfect before and after each use.
- Prohibit anyone coming to the site from an area under quarantine or if close family member has been exposed to virus in the last 14 days.
- Provide a Toolbox talk to all staff and workers before work restarts.
- Provide facemasks to all visitors (i.e., concrete truck drivers, plant maintenance, and laboratory staff) and a copy of the requirements in Arabic for working at the site.
- Issue Facemasks to all employees and these will become mandatory PPE for people moving around the site. It can be removed when inside vehicles and offices.
- Keep min. 2m between desks in the offices. Use conference room and PWA site office to spread out the staff. Allow non-critical site staff to work from home or off-site office.