

Palestinian Heritage Trail

Palestinian Heritage Trail: Increased Economic Opportunities and Improved Livelihood for Fragile Communities Project (P170706)

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

January 28, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Palestinian Heritage Trail,(hereinafter the **Recipient**) shall implement the Palestinian Heritage Trail: Increased Economic Opportunities and Improved Livelihood for Fragile Communities Project (the **Project**). The International Bank for Reconstruction and Development/International Development Association (“World Bank”), acting as administrator of grant funds under the Japan Social Development Fund has agreed to provide financing for the Project.
2. The Recipient shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions to be carried out or caused to be carried out by the Recipient, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESCP and the ESSs, all in a manner acceptable to the World Bank.
3. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the World Bank by PHT as required by the ESCP and the conditions of the legal agreement, and the World Bank shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
4. As agreed by the World Bank and PHT, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, PHT shall agree to the changes with the Bank and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the World Bank and PHT. The Recipient shall promptly disclose the updated ESCP.
5. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, PHT shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts on labor and working conditions, occupational and community health and safety, and environment.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the World Bank regular monitoring reports on the environmental and social performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and performance of the grievance mechanism(s).</p> <p>Submit to the World Bank the Environmental and Social Due Diligence (ESDD) conducted for the selected beneficiaries for financing.</p>	<p>Starting not later than ninety (90) days after the Effective Date of the Project and then quarterly (every three (3) months) throughout the Project implementation.</p> <p>On a continuous basis, submit to the World Bank for review the ESDDs after the Effective Date and throughout the Project implementation.</p>	Recipient
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including but not limited to cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury.</p> <p>Provide and require the selected Beneficiaries for financing to provide sufficient details regarding the incident or accident, findings of the Root Cause Analysis (RCA), indicating immediate measures or corrective actions taken or that are planned to be taken to address it and any information provided by the involved Beneficiary, as appropriate.</p> <p>Subsequently, as per the World Bank's request, prepare and submit an incident report, including RCA, measures taken and propose any measures to prevent its recurrence.</p>	<p>Notify within 48 hours after learning of the incident/accident.</p> <p>Submit an incident report, within 30 business days from date of notification unless a different timeframe is agreed with the World Bank.</p>	Recipient
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Enhance and maintain the capacity of the PHT with qualified staff and resources for the management and monitoring of E&S risks and impacts of the Project, by appointing: one Monitoring and Evaluation Officer (M&E O) who will be responsible for environmental and social management and will be supported by an E&S consultant, with ESF experience, that should be available on a part-time basis, with experience and qualifications acceptable to the World Bank.</p>	<p>The M&E/ ESO, shall be assigned to the Project by PHT not later than one month after the Effective Date of the Project.</p> <p>All designated PHT staff for the Project shall be retained for the duration of the Project.</p>	Recipient
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>a. The Project ESMF was prepared, consulted, adopted, and disclosed. The ESMF shall be implemented throughout Project implementation.</p> <p>b. PHT shall conduct Environmental and Social Due Diligence (ESDD) for the different sub-projects and screen sub-projects in line with ESSs and the ESMF. PHT shall follow the clearance process for sub-projects as described in the ESMF and Project Operation Manual (POM) and thereafter, during Project implementation, conduct supervision spot checks of the selected Beneficiaries. The proposed sub-projects/activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> <p>c. Prepare site-specific E&S instruments per the requirements of the ESMF, if and as needed, and incorporate the relevant aspects of this ESCP, including, <i>inter alia</i>, any environmental and social management plans or other instruments, ESS2 requirements, and any other required Environmental, Social Health and Safety (ESHS) measures, into the ESHS specifications of the procurement documents and contracts with beneficiaries and contractors. Thereafter, ensure that the Beneficiaries and contractors comply with the ESHS specifications of their respective contracts.</p>	<p>a. The ESMF to be implemented throughout Project implementation.</p> <p>b. Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>c. Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</p>	Recipient

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Screen any proposed subproject in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter, prepare, disclose, consult upon, adopt, and implement the subproject Environmental and Social Management Plan (ESMP) or ESMP Checklists, as required, in a manner acceptable to the World Bank. The proposed subprojects described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	Throughout Project implementation	
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures (LMP), into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<i>Supervise contractors throughout Project implementation</i>	Recipient and beneficiary firms
1.5	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference and are consistent with the ESSs.</p>	<i>The technical assistance activities are carried out consistent with the ESSs throughout Project implementation.</i>	Recipient
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The Project Labor Management Procedures (LMP) was prepared, consulted upon disclosed, and adopted and shall be implemented throughout Project implementation in accordance with ESS2. The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the World Bank, including through, <i>inter alia</i>, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), adequate measures for child labor, Gender Based Violence (GBV), sexual harassment, Violence Against Children (VAC), setting out grievance arrangements for Project workers, and incorporating labor requirements including Occupational Health and Safety into the ESHS specifications of the procurement documents and contracts with third party service providers.</p>	Implement and monitor the implementation of the LMP throughout Project implementation.	Recipient
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Maintain, and operate an accessible grievance mechanism (GM) for Project workers as described in the LMP, consistent with requirements under relevant national law as confirmed by the World Bank and ESS2.</p>	Grievance mechanism shall be operational prior to engaging Project workers and maintained throughout Project implementation.	Recipient
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health, and safety (OHS) measures specified in the LMP, ESMP and ESMP Checklist.</p>	<i>Same timeframe than for the implementation of the ESMP and ESMP Checklists.</i>	Recipient and beneficiary firms
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Resource efficiency and pollution prevention and management measures shall be included in the site-specific E&S instruments consistent with ESS3 and in a manner acceptable to the World Bank and shall be part of the ESDD to be conducted for each sub-project as indicated in action 1.2 above.</p>	Included as part of action 1.2	Recipient

ESS 4: COMMUNITY HEALTH AND SAFETY

4.1	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities and include measures to address them in the site specific E&S instruments consistent with ESS4 and in a manner acceptable to the World Bank. These measures shall be part of the E&S due diligence (ESDD) to be conducted by PHT for each sub-project as indicated in action 1.2 above.	Included as part of action 1.2.	Recipient
4.2	GBV and SEA/SH RISKS: Adopt and implement measures to assess and manage GBV/SEA/SH risks in line with the ESMF and site-specific E&S instruments to be developed under action 1.2 above.	Included as part of action 1.2.	Recipient
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not Relevant to the Project	N/A	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS: PHT shall develop environmental guidelines for beneficiaries to address any biodiversity risks and impacts of sub-projects, as relevant, to prevent and mitigate risks and impacts concerning natural habitat and wildlife, consistent with ESS6 requirements and in a manner acceptable to the World Bank.	Not later than 90 days after the Effective Date of the Project and maintained throughout Project implementation.	Recipient
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not Relevant to the Project	N/A	
ESS 8: CULTURAL HERITAGE			
8.1	PHT shall develop guidelines for beneficiaries to address any risks and impacts of sub-projects concerning cultural heritage, as relevant, and adopt chance find procedures for any trail upgrading activities, consistent with ESS8 requirements and in a manner acceptable to the World Bank.	Not later than 90 days after the Effective Date of the Project and maintained throughout Project implementation.	
ESS 9: FINANCIAL INTERMEDIARIES			
9.1.	Not Relevant to the Project	N/A	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION The Project SEP was prepared, disclosed, consulted upon, and adopted and shall be maintained and implemented consistent with ESS10 and in a manner acceptable to the World Bank.</p>	Implement and update, as required, throughout Project implementation	Recipient
10.2	<p>PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain and operate an accessible grievance mechanism (GM), including with requisite staff, as described in the SEP to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously. The GM shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints and integrate GBV sensitive measures, including multiple channels to initiate a complaint and specific procedures for SEA/SH, such as confidential and/or anonymous reporting with safe and ethical documentation of SEA/SH cases.</p>	GM shall be operational not later than 30 days after the Effective Date of the Project and maintained throughout Project implementation.	Recipient
CAPACITY SUPPORT (TRAINING)			
CS1	<p>PHT staff to train the beneficiaries as needed on the World Bank's E&S requirements on:</p> <ol style="list-style-type: none"> 1. Environmental and Social Management Framework 2. Environmental, Health and Safety Guidelines 3. SEP 4. LMP 5. GRM including SEA/SH 	Throughput Project implementation	Recipient