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Digital West Bank and Gaza Project

Project ID No. P174355

Environmental and Social Management Framework

(ESMF)

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List of Acronyms

BSA	Broadband Strategy Assessment
CA	Certification Authority
COVID-19	Coronavirus-19
CQCU	Complaints and Quality Control Unit of MTDE
e	Electronic
EA	Environmental Assessment
EEE	Electrical and Electronic Equipment
e-GP	e-Government Procurement
EHS	Environment, Health and Safety
EHSG	Environmental, Health, and Safety Guidelines
E&S Specialist	Environmental and Social Specialist
E&S Officer	Environmental and Social Officer
ES	Environmental and Social
e-ID	e-Identification Document
EIA	Environmental Impact Assessment
ERC	Emergency Response Center
ESIA	Environment and Social Impact Assessment
ESMP	Environmental and Social Management Plan
EQA	Environment Quality Authority
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environment and Social Standard
ESSC	Environmental and Social Screening Checklists
EWMP	E-Waste Management Plan
G	Generation
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GIIP	Good International and Industry Practices
GRM	Grievance Redress Mechanism
HCPPP	High Council for Public Procurement Policies
ICT	Information and Communication Technology
IEE	Initial Environmental Evaluation
ISP	Internet Service Provider
JDECO	Jerusalem District Electricity Company
LMP	Labor Management Procedure
M&E	Monitoring and Evaluation
MFD	Maximizing Finance for Development
MoE	Ministry of Education

MoF	Ministry of Finance
MoUs	Memorandum of Understandings
MoNE	Ministry of National Economy
MoH	Ministry of Health
MTIT	Ministry of Telecommunication and Information Technology
MTDE	Ministry of Telecommunications and Digital Economy
NGOs	Non-Governmental Organizations
OHS	Occupational Health and Safety
PA	Palestinian Authority
PCBS	Palestinian Central Bureau of Statistics
Paltel	Palestine Telecommunications Company
PAP	Project Affected People/Parties
PC	Project Counterpart
PCS	Palestinian Computer Society
PDO	Project Development Objectives
PEL	Palestinian Environment Law
PEAP	Palestinian Environmental Assessment Policy
PMIU	Project Management and Implementation Unit
PPA	Project Preparation Advance
PPE	Personal Protective Equipment
SH	Sexual Harassment
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
QPR	Quarterly Progress Report
TITRC	Telecommunication and Information Technology Regulatory Commission
TRA	Telecom Regulatory Authority
VO	Variation Order
WB&G	West Bank and Gaza
WHO	World Health Organization

0. Executive Summary

0.1 Digital WB&G Project

The Digital West Bank and Gaza (WB&G) project and the project restructuring , to be implemented by the Ministry of Telecommunications and Digital Economy (MTDE), formerly known as the Ministry of Telecommunication and Information Technology (MTIT), will seek to produce concrete and tangible results for the Palestinians through (a) improve quality of high-speed broadband services in selected areas, (b) enable development of selected e-services for response, recovery, and resilience from shocks, such as COVID-19, and (c) increase access to selected e-government services.

To achieve the Project and the restructuring project Development Objectives (PDO), the project is articulated around four components and the proposed activities are conceived following the country's priorities and funding needs in the medium term: i) Enabling legal and regulatory environment for digital economy by strengthening development of key institutions of digital economy and development of legal and regulatory frameworks and cybersecurity and data protection. Capacity building activities are also included in this component, ii) Implementing digital infrastructure solutions for emergency response, recovery and resilience which will establish Emergency Response Center (ERC), expanding access to broadband connectivity through sustainable Maximizing Finance for Development (MFD) approach, and expanding connectivity through development of fiber optic infrastructure, iii) Fostering user centered e-service delivery enabling environment for accelerated development of e-services which will result in delivering user-centric e-services, development and implementation of e-government procurement (e-GP), and functionalities in targeted high-spending agencies. Project management and implementation support is the fourth component of the Digital WB&G Project and includes the establishment and capacity building of a Project Management and Implementation Unit (PMIU) including for procurement, monitoring and evaluation, citizen engagement, outreach and communications, and environmental and social safeguards.

A Level-2 restructuring is proposed, with changes made to the following aspects of the Project: (i) revision of existing components' scope and cost allocation, with the NFC-related activity dropped from Subcomponent 2.3, and replaced by three new activities for a) quality of service monitoring, b) creating the data infrastructure foundation for e-government services and c) the creation of one stop shop service windows; the addition of the new activities b and c do not introduce any changes to the Grant Agreement. (ii) revisions to the Results Framework, including changes to PDO, PDO indicator and intermediate indicator; and (iii) a change in disbursement estimates. The scope of the new activities and details of the proposed restructuring were finalized and agreed with MTDE.

0.2 Justification of the ESMF

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

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

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

0.3 Rationale for Restructuring

The proposed restructuring is triggered by the MTDE's decision to open the fixed broadband infrastructure market to competition. Since December 2021, Internet Service Providers (ISPs) have been allowed to deploy their own fiber infrastructure and more specifically use the existing infrastructure (right of ways, poles, and fiber) from the electricity companies. ISPs consequently signed bilateral agreements, some exclusive, with electricity companies.

MTDE's decision made obsolete the previous approach based on the Palestinian cabinet resolution from February 2020 to create a National Fiberoptic Company (NFC) as a wholesale fixed broadband infrastructure provider, which was pursued at the time of Project preparation. The NFC mandate included expanding a regulated wholesale fiberoptic infrastructure using excess public fiber optic capacity (e.g., along the energy grid) across West Bank and Gaza and providing regulated wholesale services to licensed internet service providers (ISPs) who would be providing broadband services to end users. The NFC infrastructure would have enabled ISPs to compete at the retail service level only, as opposed to retail level and infrastructure level. Under Subcomponent 2.3, the Project was initially designed to support the establishment of NFC by institutionalization and public-private partnership (PPP) structuring.

During the implementation support mission of February 20–28, 2023, the MTDE expressed interest in restructuring the Project to reallocate Subcomponent 2.3. Discussions took place on the activities that could be conducted with the freed-up funds and resulted in a formal Project restructuring request letter dated July 12, 2023, from the Ministry of Finance (MoF). Discussions led to an additional activity, to transform selected post offices, connected under the Subcomponent 2.2 "Expanding access to broadband connectivity", to become physical one stop-shop service windows to facilitate access to e-services by citizens and businesses to be provided with support of Component 3.

The Project restructuring entails three new activities, which would support: a) the selection of an advanced platform to monitor quality of service parameters of fixed and mobile telecom networks, based on a crowdsourcing solution, in order or the newly created Telecommunications Regulatory Authority (TRA) to assess licensed operators' service performance and ensure compliance with their license obligations (to be added to Subcomponent 1.1 (Strengthening development of key institutions of digital economy)); b) a support to the expansion of the Government Cloud hosted in the MTDE Data Center (DC) with i) a TA to review the Government's cloud readiness enabling environment and strengthen data governance, and ii) an investment in servers for the Government Cloud extension to support the planned increase in e-government services (a new activity in Subcomponent 3.2); and c) the transformation of selected post offices (30) into one stop shop service windows (a new activity in Subcomponent 3.2)..

0.4 Institutional and Implementation Arrangements

The MTDE will act as the formal Project Counterpart (PC) to the project and as the overall implementing and supervisory entity through its PMIU. While the PMIU and the Project Director will be responsible for the overall implementation of the environmental and social instruments of the project as well as reporting back to the Bank, the PMIU will recruit an Environment, Health and Social (EHS) officer who will be responsible for implementing all steps and mitigation measures presented in the ESMF, the LMP and the SEP. The EHS officer at MTDE/ PMIU will conduct regular on-site monitoring of works to verify adherence to the requirements set out. The EHS officer will also be responsible for monitoring and reporting on compliance of environmental and social issues. In addition, the EHS officer is expected to create awareness among all implementing partners on environmental and social compliance, and any training necessary for its effective implementation.

Other related Palestinian ministries and authorities, contractors/suppliers and Internet Service Providers (ISP), who are to be involved by the project components will be coordinated by the MTDE. The Higher Council for Public Procurement Policies (HCPPP), who is the main partner under component 3.3: Development and implementation of priority e-GP, is to share its responsibilities and commitment. The project is to support HCPPP in developing software reference architecture, business process reengineering and in managing e-GP development and implementation.

Among the overall management and monitoring required by PMIU at MTDE are:

- Design of project components and preparation of related works, including safeguard requirements;
- Stakeholder consultations and ongoing coordination;
- Concluding Memorandum of Understandings (MoUs) with the HCPPP and other involved institutions;
- Preparation of the work planning;
- Preparation of the progress and financial reports;
- Project procurement, including selection and contracting of contractors and suppliers;
- Financial management and control of project funds including;
- Day-to-day project management;
- Monitoring and Evaluation.
- Compliance with safeguard requirements

Chapter 7 presents the detailed responsibilities and institutional arrangement foreseen for the project and present these in schemata (**Figure 1**).

0.5 Environmental and Social Risk Screening

The ESMF provides a screening process to: (i) identify potential key environmental and social impacts and risks; (ii) determine appropriate environmental and social risk classification, according to ESS1; (iii) review and approve project activities; and; (iv) identify mitigation and monitoring measures. Environmental and Social Screening Forms are presented in Annex 11.2 of this ESMF which has been prepared by the PMU and has been reviewed and cleared by the World Bank in 2023.

The environmental and social risk rating remains moderate and the ESSs relevant for the parent project remain relevant for restructuring. The World Bank's Environmental and Social Standards relevant to the Digital WB&G project and the project restructuring are; ESS1 on Assessment and Management of Environmental and Social Risks and Impacts, ESS2 on Labor and Working Conditions, ESS3 on Resource Efficiency and Pollution Prevention and Management, ESS4 on Community Health and Safety, and ESS10 on Stakeholder Engagement and Information Disclosure. The other five ESSs (ESS5, ESS6, ESS7, ESS8, and ESS9) are not relevant to this project.

Under components 2 and 3 the project activities will involve small-scale works in businesses and institutions during the expansion of IT hardware, retrofitting of buildings to enable the installation of internet connection for, software, and Information Technology (IT) equipment (computers, servers, cables, etc.) for the Emergency Response Center and the e-government services and platforms. Also will involve minor civil works for installation of equipment, data center upgrade and minor refurbishment to establish one-stop-shops.

The E&S risks for activities included in the restructuring are related to: minor civil works for installation of equipment and minor refurbishment to establish one-stop-shops (ESS1); risk of fire safety in buildings hosting equipment and one-stop-shops (ESS4); data privacy and security (ESS1); generation of e-waste (ESS3); digital exclusion due to lack of or poor digital literacy in and lack of accessibility of relevant information by some groups and communities, particularly relatively vulnerable categories (ESS1); and potential complaints related to GBV/SEA/SH in one-stop-shops and in the digital space (ESS1 and 4).

The MTDE currently does not have the environmental and social management capacity to manage the impacts and risks expected from the Digital WB&G Project.

The likely social risks associated with the project can be summarized as follows: risks related to social exclusion in its various forms that would need to be mitigated through ensuring that project benefits can be accessed and optimized for the most vulnerable, including those living in poor and remote communities; (b) risk of the exclusion of women such as access to broadband services, internet connectivity, e-services and job opportunities exist, (c) risk of exposure of workers and vulnerable communities to sexual harassment or exploitation; and (d) risks related to labor and working conditions for project contracted workers or the PMU employees (e) risks associated with data privacy from the restructuring activities of supporting the expansion of the Data Center, including the TA for cloud reediness, data usage, and retention, as well as the monitoring the quality of service parameters under subcomponent 1.1. The project will not result in any risks related to involuntary resettlement. A Gender-Based Violence (GBV)/ Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) screening was conducted, and the risk is considered moderate. These impacts in addition to possible interruption of services during project implementation and installation activities, could become a source of grievance. Currently there is no risk related to involuntary resettlement or land acquisition, given that there is no civil works under the project only some minor rehabilitation of the existing networks and retrofitting of buildings to accommodate the IT equipment (computers, servers, cables, etc.) including the e-government services and platforms.

The likely impacts and suggested mitigation measures are presented in **Table 1** and are detailed in this ESMF.

Table 1: Likely impacts and suggested mitigation measures of the Digital WB&G Project

Issue	Likely Impact	Mitigation Measures
Telecom/Digital Services	During the installation of the equipment, which will take place within the ministry premises, access to some of the adjacent buildings could be disturbed. The impact will be temporary and if occurs those buildings will be provided with alternative access during the installation. Disturbed.	• In case of disturbances to the offices adjacent to the installation sites where equipment will be placed, the contractor/supplier shall provide temporary access to avoid disturbance of the routine office activities. • The contractor/supplier shall notify the ministry authorities at least one week in advance of the schedule and duration of installation works. • The contractor/supplier shall coordinate with ministry authorities to ensure continued access during installation works.
E-waste	Poor management and piling up rand improper disposal of e-waste may cause health and environmental impacts, as well as an unpleasant visual impact.	• Reduce hazardous e-waste generation by implementing stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste. • Reuse/ recycle products that can be reintroduced into the operational processes. • Investigation of markets for recycling by other industrial processing operations located in the region. • Establishing of formal tracking of e-waste generation and recycling rates. • On-site or off-site treatment of the e-waste material to render it non-hazardous prior to final disposal.
Life and fire safety	improper connection of IT equipment which may result risk of electrical shock in buildings hosting equipment and one-stop-shops	• Implement occupational health and safety guidelines
Labor and working conditions	• Terms and conditions of employments are not in	• MTDE will implement LMP (separate document) for mitigating the labor and working conditions, including those related to child labor.

Issue	Likely Impact	Mitigation Measures
	accordance with the requirements of national law and ESS2. • Limited risk of child labor. However, based on the assessment of the sector this risk is negligible. • Risk of stress, fatigue or burnout of staff of PMIU, High Council for Public Procurement Policies (PCPPP) due to overworking to manage the project activities. • Exposure of project workers to GBV (SEA / SH)	• The EHS officer at MTDE-PMIU will review to ensure that terms and conditions of all project's workers are in accordance with the requirements of national law and ESS2 as indicated in the LMP. The project's workers will be able to lodge their complaints, concerns, difficulties to the project's (Workers') GM. • Develop and include GBV (SEA / SH) redress and referral mechanisms in the Workers' GM.
Social or inequity	Could arise from fairness and equity in decision making	• Ensure fair competition by creating a level playing field • Ensure that project benefits, such as job opportunities, can be accessed and optimized for the most vulnerable and youth, including those from poor communities and women • Ensure access to information and transparency in decisions • Undertake public consultation and information dissemination • Establish and create awareness on grievance redress mechanism
Stakeholder consultations and mechanisms to assure transparent and equitable	• Inadequate consultations with relevant stakeholders during the preparation and finalization of the project activities. • No mechanism for stakeholders	• Consultations processes would be initiated with relevant stakeholders during the preparation, implementation and finalization of the project's activities in accordance to ESS10 as indicated in the Stakeholder Engagement Plan (SEP). • Operational GM for the public (project's GM) will be ensured to

Issue	Likely Impact	Mitigation Measures
provision of employment	to raise concerns & objections against project activities.	raise any concerns regarding project activities within a set time period.
Gender based Violence (GBV) and SEA/SH	Exposure of youth, including vulnerable youth and women to possible GBV and SEA/SH concerns.	• The project level GM should include specific procedures for GBV/SEA/SH including confidential reporting and ethical documentation of relevant cases in addition to effective uptake channels and adequate referral mechanisms that are survivor centric. • Conduct E&S awareness to project workers, including on the GM and CoC[1].
Data Privacy and Security	The Technical Assistance (TA) and the expansion of the data center and cloud storage can result in concerns related to data security and privacy risks including the misuse of Personal Identifying Information (PII) by consultants or staff	• Ensure adequate data safety and security measures in the data center. • Provide capacity building to staff on data security and data handling. • Include adequate measures in contracting documents with consultants, direct, and contracted workers.

[1] https://mtit.pna.ps//uploads/files/20230412014513_Project_Workers_CoC_28112021_-_ARABIC_V2.pdf

0.6 Environmental and Social Monitoring

Environmental and social monitoring programs and indicators are required to be implemented and measured to address all activities that have potential impacts on the environment during normal operations and upset conditions. Environmental monitoring activities are to be based on direct or indirect indicators of emissions, and resource use, applicable to the particular components of the Digital WB&G Project.

Monitoring frequency shall be sufficient to provide representative data for the parameter being monitored. Monitoring shall be conducted by the Environmental and Social Officer (ESO) to be recruited at the PMIU, following monitoring and record-keeping procedures. Monitoring data shall be analyzed and reviewed at regular intervals and compared with the operating standards so that any necessary corrective actions/measures can be taken.

0.7 Public Consultations, Grievance and Disclosure

Public consultations have been integral to the Digital WB&G project. The MTDE updated the Stakeholder Engagement Plan (SEP) in July 2024 following the project restructuring. The updated SEP includes summary of previous engagement activities that have been conducted throughout the project's implementation to date. Initial stakeholder meetings from August to October 2020 focused on project preparation and discussed the project design and proposed components such as the Emergency Response Center and telecommunication laws. A significant consultation in December 2020 addressed system upgrades, information security, and e-payment prioritization, emphasizing fair access and minimal disruptions. From December 2021 to mid-2023, during the DWBG project implementation, the project engaged with the different stakeholder categories identified in the SEP which included ministries, the banking sector, ISPs, and private sector companies, in addition to expanding engagements to include NGOs, CBOs, and municipalities, with a focus on GBV redress, marginalized groups representation and engagement, e-waste management, occupational health and safety, and the establishment of an ERC among other topics. Special sessions also targeted vulnerable groups, where engagement with SAWA for gender-based violence referral mechanisms was conducted mid-2023. During the period of June 2023 – June 2024, the project engaged stakeholders from several ministries (finance, health, education, transportation, interior, public works and housing, justice, and tourism), and other stakeholders from PMA, world bank, cabinet secretariat, PITA, and Palestinian standard institution in a workshop to discuss the final draft of the strategy document, as they have been engaged during the different stages through different activities, interviews, conducting surveys and workshops. Another important engagement activities related to Certificate Authority and e-transaction law took place during that period, the first one is a workshop on assurance level framework document in August 2023, where Palestinian monitory authority legal and technical representatives joined, as well as ministry of interior technical managers, the consultant working on the project and MTDE project manager and legal consultant, and the second one was a consultation session to discuss the final draft of e-Transaction law took place in May 2024, where stakeholders from public sector, Ministries of justice, planning, foreign affairs, national economy, education and interior joined, Palestinian monitory Authority, Police, Palestinian Union of Local

Authorities, Supreme Judicial council, public prosecution, PITA, Ramallah municipality, Capital market authority, Banks, and telecom operators.. Further details on these activities are available in the updated SEP, disclosed on the MTDE website, on the DWBG project page: https://mtde.gov.ps/home/Digital_Services_Development_Project?culture=ar-SA#%D8%A7%D9%84%D8%A7%D8%B5%D8%AF%D8%A7%D8%B1%D8%A7%D8%AA .

And through the Stakeholder engagement activities logs.

Moreover, on the 24th of July 2024, a consultation session for the restructuring activities and the updated ESMF was held virtually via MS Teams. The invitee list contained 156 invitees from different ministries, NGOs, INGOs, CSOs, Private-sector and banking sector representatives, universities, and municipalities. The attendees included 39 people representing the above stakeholder segments. The consultation session aimed to introduce the updated SEP and ESMF as well as the restructured DWBG project activities. It provided an overview of the project, its activities, development objective, and the updates proposed under the restructuring. The consultation session discussed the relevant national legislations and the World Bank's ESF and relevant ESSs, in addition to the E&S risks, mitigation measures, and E&S management plans and tools that apply to the DWBG and its restructuring. Disclosure mechanisms, the MTDE website, digital platforms and links such as the online forms and disclosed documents have also been discussed. The consultation session provided an overview of the updated SEP, its content, proposed changes, the different project stakeholders (i.e., PAPs, OIPs, and vulnerable groups), the engagement tools and methods, and the stakeholder engagement plan (section 4.3 below). Additionally, the project's GM has been discussed including workers' GM, anonymous grievances, and GBV referral mechanisms, the attendees were also informed of the different uptake mechanisms for the project GM and the World Bank GRS. Additionally, the consultation session included an open discussion and feedback part where stakeholders provided feedback and raised questions, received remarks included clarifications on the project implementation timeline, the GM processes and GBV referral mechanisms, the role of different stakeholders such as the media and banking sector, and remarks regarding information disclosure. Further details are available in chapter 9.

MTDE will be responsible for implementation of the project Grievance Mechanism (GM). It will advise people and stakeholders on their rights and GM process throughout the period of project implementation. MTDE has an effective GM with adequate uptake mechanisms, the GM also comprises of a workers' GM and has GBV (SEA / SH) referral mechanisms. Further description of the GM is available on the project webpage at MTDE website: https://mtde.gov.ps/home/Digital_Services_Development_Project?culture=ar-SA#%D8%A2%D9%84%D9%8A%D8%A9%20%D8%A7%D9%84%D8%B4%D9%83%D8%A7%D9%88%D9%8A. MTDE will disclose on its website project information and all key documentation, including ESMF, LMP and SEP to allow stakeholders to understand the risks and impacts of the project, and potential opportunities.

0.8 Capacity Building and Training for ESMF

Effective implementation of the ESMF will require adequate capacity enhancement for the Digital WB&G Project implementing entities; mainly PMIU at MTDE and other involved institutions and stakeholders, mainly HCPPP. This is covered by **sections 10.4 and 10.5** of this ESMF. The estimated cost for ESMF implementation is related to the hiring of EHS officer to support MTDE in the implementation of the ESMF, and to hiring of external consultant for preparing the ESMP. In total, the indicative budget associated with implementing the ESMF, including the mitigation measures described in this ESMF, and monitoring of environmental and social risks associated with the project is estimated at US$200,000.

1. Introduction

1.1 Background

The National Policy Agenda: Putting Citizens First (2017-2022) of the PA identifies digital transformation and the digital economy as a top priority to achieve a strong, inclusive, and sustainable economy. Accounting for 7% of Gross Domestic Product (GDP), the Information and Communication Technology (ICT) sector in Palestine already plays an important role and has the potential to grow markedly into a full-fledged digital economy with increased demand from sectors such as agriculture, health, education, and government services.

The Palestinian telecom sector is governed by the Decree No. (37) of 2021 regarding communications and information technology and its amendment Decree Law No. (23) of 2022. There is no digital economy strategy exists. Yet, the recently updated "Sectoral Strategy for National Economic Development 2020-2022", by the MoNE, acknowledges the relevance of "digital", making it part of its objectives to create an enabling and attractive business environment, defined in terms of "supporting and promoting digital and technological industries as well as enhancing digital content". This has been endorsed by the Sectoral Strategy for ICT 2021-2023 and the ICT policy 2020-2030 by the Palestinian Ministry of Telecommunications and Digital Economy (MTDE). The MTDE is developed the e- Digital Government Strategy 2024-2029 and it has been endorsed by the cabinet.

The MTDE has been engaged since 2005 in drafting a legal and regulatory framework, including the establishment of the independent Telecommunications and Information Technology Regulatory Commission (TITRC); In accordance with the Law of December 12, 2021, concerning the Telecommunications and Information Technology and creating the Telecommunications Regulatory Authority (TRA), the acronym "TITRA" is replaced with "TRA", as reflected in the Amendment No. 1 to the Trust Fund Grant Agreement. The modification of the name does not change the functions and capacity of the authority.

Decree No (37) 2021 regarding communications and information technology aims to regulate the telecommunications and IT sectors, in line with technological development, and to ensure the provision of high-quality telecommunications and IT services in appropriate, fair and competitive terms and prices, monitoring the performance of licensed companies and protecting beneficiaries and subscribers of telecommunications services and information technology, creating competitive environment for establishing telecommunication networks, providing telecommunication and information technology services and prevent monopoly. Encouraging investment in telecommunication and information technology sector and ensuring investor protection, Ensuring providing telecommunication services for all areas by achieving comprehensive telecommunication services; and building and developing creativity and innovation in telecommunication and information technology industry

The approval of decree No (37) 2021 and it amendment Decree No. (23) 2022 should overcome the following previously address weakness in the IT sector: (i) a lack of responsiveness in addressing sector-specific technical and legal issues; (ii) a negative impact on the transparency of the licensing

process; and (iii) an absence of regulation vis-à-vis Palestine Telecommunications' Company (Paltel) dominant position and therefore negative impact on consumers in terms of prices and quality of service.

The pandemic (COVID-19) has forced individuals to physically distance themselves, and "traffic" has shifted from roads and highways onto digital networks, making high speed and reliable internet connections a vital lifeline. In WB&G, digital transformation provides the country with new possibilities to connect people and businesses and to provide services in contexts where traditional methods cannot, even in the current regional context.

In WB&G digital technologies and relevant digital policies are playing a key role in mitigating the crisis through digital connectivity and essential digital solutions. Digital economy solutions can boost innovation, enhance competition and pave the way for new opportunities by the way of enhanced economic growth and better functioning domestic labor markets. By investing in digital economy, WB&G can be better prepared to deal with pandemic (COVID-19) and similar future emergencies, including future climate and natural disaster events. The increasing use of digital networks makes high speed and reliable internet connections a vital lifeline.

1.2 Digital WB&G Project

The World Bank plans to conclude a "Digital Economy Country Assessment" report for Palestine, investigating in detail the five defining pillars of a digital economy, defined in terms of: digital infrastructure, digital platforms, digital finance, digital entrepreneurship, and digital skills. The report will assess the enabling environment and level of development of Palestinian digital economy along with the key levers that drive the country's digital economy. The findings of the diagnostic are intended to provide practical, actionable recommendations to government and stakeholders on priority areas of development, with a mix of possible policy reforms and financing needs.

A key challenge to foster the emergence of a vibrant, dynamic and safe digital economy in the WB&G is to rapidly develop the digital infrastructure. The Palestinian operators face restrictions on building infrastructure, spectrum allocation for 3rd/4th Generation (G) mobile broadband, ICT equipment imports and deployment, rights of way in Area C, and market competition from Israeli operators. While under existing agreements the Palestinian Authority (PA) has the right to build and operate an independent telecommunications infrastructure along with the right to establish its own telecom policies, Israel has decision-making power over the frequency spectrum.

The Digital WB&G Project and the project restructuring will seek to produce concrete and tangible results for the Palestinians through improve quality of high-speed broadband services in selected areas and increased access to selected e-services to citizens and businesses. The proposed operation is transformational as it will focus on key "internal" low hanging fruits to unleash digital transformation in WB&G addressing, through the proposed operation, some of the bilateral challenges allowing digital transformation to achieve its full potential and will strengthen the digital resilience of WB&G and the PA's ability to respond to shocks, such as COVID-19.

The project restructuring is triggered by the MTDE's decision to open the fixed broadband infrastructure market to competition. Since December 2021, Internet Service Providers (ISPs) have been allowed to deploy their own fiber infrastructure and more specifically use the existing infrastructure (right of ways, poles, and fiber) from the electricity companies. ISPs consequently signed bilateral agreements, some exclusive, with electricity companies.

MTDE's decision made obsolete the previous approach based on the Palestinian cabinet resolution from February 2020 to create a National Fiberoptic Company (NFC) as a wholesale fixed broadband infrastructure provider, which was pursued at the time of Project preparation. The NFC mandate included expanding a regulated wholesale fiberoptic infrastructure using excess public fiber optic capacity (e.g., along the energy grid) across West Bank and Gaza and providing regulated wholesale services to licensed internet service providers (ISPs) who would be providing broadband services to end users. The NFC infrastructure would have enabled ISPs to compete at the retail service level only, as opposed to retail level and infrastructure level.

The Digital WB&G Project is being prepared under the World Bank's ESF, which came into effect in October 2018, replacing the Bank's Environmental and Social Safeguard Policies. Under the ESF, the project is to comply with the 10 Environmental and Social Standards (ESSs) applied to investment project financing (IPF) financed by the Bank. The project recognizes the significance of, and adopts the ESSs, for identifying and assessing as well as managing the environmental and social risks and impacts associated with this project.

As per the World Bank ESF, the MTDE is committed to conducting Environmental Assessment (EA) for all investments and projects financed under the Digital WB&G Project. Among others, ESMF, SEP and LMP are to be implemented. An Environmental and Social Commitment Plan (ESCP) is prepared to identify the commitment of MTDE towards consideration of the ESSs.

A framework approach is selected, based on the fact that the investments will be fully identified during project implementation. The ESMF describes the generic environmental and social impacts and mitigation measures of potential investments envisaged under the Digital WB&G Project. It sets the standards, which will guide screening of the project activities, and preparation of Environmental and Social Management Plan (ESMP) for individual components financed under the Digital WB&G Project.

The ESMF shall be incorporated and implemented as a tool for the Digital WB&G Project and the project restructuring to support sustainable economic and social development of the Palestinian people, and the telecommunication sector in particular, through assisting in meeting the following goals:

1. Ensuring an adequate standard of life in all its aspects, and not negatively affecting the basic needs, and the social, cultural and historical values of people as a result of the development activities.
2. Preserving the capacity of the natural environment to clean and sustain itself.

3. Conserving the sustainable use of natural resources.
4. Avoiding irreversible environmental damage, cumulative adverse impacts, and minimizing reversible environmental damage.

2. Project Description and Components

2.1 Project Concept

The Digital WB&G Project and the project restructuring will seek to produce concrete and tangible results for Palestinians through (a) improve quality of high-speed broadband services in selected areas; (b) enable digital transformation of selected administrative services for response, recovery and resilience from shocks, such as COVID-19, and (c) increase access to e-government services.

The above project development activities are to be measured by the three following indicators:

- Number of people provided with new or enhanced access to broadband internet (CRI,)
- % of reduction of time to respond to selected emergency services, and
- % of increase in user satisfaction with the selected e-services.

The project will be gender informed to reinforce women's access to public administrative services and ensure equal representation of female beneficiaries.

(1)

2.2 Project Components

The Digital WB&G Project and the project restructuring will seek to produce concrete and tangible results for the Palestinians through improve quality of high-speed broadband services in selected areas and increased access to digital services to citizens and businesses. To achieve the PDOs, the project is articulated around four components, and the proposed activities are conceived following the PA's priorities and funding needs in the medium term. The project restructuring includes a change in activities within Component 1 and 3, and cancellation of the NFC activity (subcomponent 2.3). The added activities are: i) Selection of a Quality of Service Crowdsourcing Platform added to Subcomponent 1.1 (Strengthening development of key institutions of digital economy). ii) Review and implementation of the 2021 Cloud Readiness Assessment actions and key recommendations for data iii) Purchase and implementation of servers (hardware and software), and iv) Purchase of furniture, equipment, and refurbishment works for pilot digital access points (The preceding three new activities will be included in Subcomponent 3.2 (Delivering user centric e-services).

The four components are:

Component 1. (4.40US$ million) Enabling legal and regulatory environment for Digital Economy; mainly institutional development including the development of a Palestinian Telecommunications and Telecom Regulatory Authority (TRA) and root Certificate Authority (CA); legal and regulatory framework; and capacity building.

This component will contribute to building the analog foundations of the digital economy; focusing on creating an enabling policy, legal, and regulatory environment and strengthening institutional capacity. Subcomponent activities include establishing and making operational the

TRA and providing support to the MTDE and other key stakeholders in developing strategies and analytical studies, strengthening their technical capacity, and procuring of ICT equipment. These activities will strengthen the MTDE's capacity to develop sectoral strategies and monitor their implementations, strengthen TRA's capacity to regulate and oversee the developments in the digital sector, facilitate the emergence of digital economy and increase quality of service based on a crowdsourcing solution.

Component 2. (3.50US$ million) Implementing Digital Infrastructure Solutions for Emergency Response, Recovery and Resilience. This component will support (i) the creation of the integrated national Emergency Response Center (ERC), (ii) the expansion of access to broadband connectivity through sustainable MFD approach.

These measures are particularly important in the context of mobilizing and responding to national and international crises and emergencies by helping to warn the population and increasing the efficiency of first responders' interventions. They are also expected to contribute to strengthening the resilience of the digital networks, reducing the operators' operating costs, and increasing competition.

Component 3. (9.60US$ million) Fostering user centered e-service delivery by enabling environment for accelerated development delivering user-centric e-services, and development and implementation of priority e-government procurement (e-GP) functionalities in targeted high-spending agencies. This component includes secured digital public platforms and digital service delivery to citizens and businesses by of the establishment of Data Recovery Site (DRS).

This component will contribute to the establishment of an efficient, government-wide digital public platform that will allow for the provision of G2C, G2B and G2Px services across the WB&G, as well as the digital exchange of information between government, citizens, and businesses, also will enable TRA to rapidly identify the areas with high user density and/or poor coverage, and what network changes are needed to improve service quality in those locations, will ensure key appropriate policy and regulatory enablers and safeguards are in place for the data infrastructure and will support access to e-services by citizens and businesses This will be complemented with the establishment of a modern e-government procurement system.

Component 4. (2.5 US$ million) Project management and implementation support by the establishment and capacity building of Project Management and Implementation Unit (PMIU) for procurement, monitoring and evaluation, citizen engagement, outreach and communications, and environmental and social standards.

The Digital WB&G Project will support the creation of a dedicated PMIU in the MTDE, tentatively. This component would also provide support to finance project management related issues including project coordination, financial management, and citizen engagement, and will provide support through office equipment, incremental operating costs, and audits. The project will emphasize gender equity in the recruitment and retention by ensuring inclusion of women in all decision-making bodies under the project.

Component 5. (US$ 0.0 million) – Contingent Emergency Response Component. In the CPP context of the COVID-19 crisis, a Contingent Emergency Response Component (CERC) is added to the project structure to allow for quick disbursement of uncommitted balances as a response measure to any crisis (current or future). It will have an initial zero value but may be financed during the implementation of the project to allow for agile response to emerging events, with funds redirected from other components.

The MTDE is the formal Digital WB&G Project counterpart and the overall implementing entity. The Higher Council for Public Procurement Policies (HCPPP) is the main partner under project component 3 related to the development and implementation of e-Government Procurement (e-GP). The project is to support HCPPP in developing software reference architecture, business process reengineering and in managing e-GP development and implementation.

Table 2 details the project's components, sub-components and related activities.

Table 2: Digital WB&G Project's components, sub-components, and detailed related activities

Project Component	Detailed Related Activities
Component 1: Enabling legal and regulatory environment for Digital Economy **4.40US$ million**	· Institutional capacity for the design, implementation and evaluation policies in support of digital transformation and emergence of digital economy in WB&G. · Support the creation and operationalization of a Palestinian TRA · Support the creation of CA for e-signatures and the relevant legal and regulatory frameworks · Support regulatory and policy environment in the telecommunications and broadband sector. · Introduction of e-government services. · Software and hardware equipment, developing necessary regulatory frameworks, laws and bylaws, · Providing technical assistance for capacity building and institutional development activities.
Sub-component 1.1: Strengthening development of key institutions of digital economy	· Establishment and operationalization of the TRA and reinforce its regulatory and technical capacity. · Provision of a reliable and efficient telecom services, promote competitiveness in the digital market and support research into the development and use of new technologies. · Protect and promote the interests of consumers, businesses and the public interest and maintain the quality and variety of telecom services. · Provide support for (i) the start-up and initial operating of the TRA, including the rental of the premises, the hosting of meetings of the Board of Directors and the hosting of stakeholder consultation meetings, and development of a manual of internal procedures, (ii) a "recruitment of an expert who can provide the Technical Assistant required for operating enhanced Quality of Services monitoring" and (iii) the purchase of office equipment (e.g. laptops and printers) and set up of a public website. · Establishment of the CA, which will issue digital certificates and digital signatures that will be used in a wide range of transactions across the public and private sectors. · Support the CA by providing (i) Technical Assistance (TA) for the purchase and implementation of security models and software, and (ii) TA for the purchase of CA software, hardware, and licenses. (iii) installation of hardware and software solutions and equipment.

	· Quality of Service Crowdsourcing Platform: Select an advanced platform to monitor parameters of fixed and mobile telecom networks quality of service based on a crowdsourcing solution, to assess operator's performance and ensure licensing compliance.
Subcomponent 1.2: Development of Legal and Regulatory Frameworks and Cybersecurity and Data Protection	· Upgrade and development of legal and regulatory frameworks that will enable the operationalization of the TRA and CA in the telecom sector · Review and update of existing telecommunications policy, legal and regulatory frameworks to effectively address existing market bottlenecks and increase the telecom market competitiveness. · Creation of compliant bylaws to the e-Transactions Law of 2017 to lay the legal foundations for the private sector and entrepreneurs to effectively utilize the functions of the CA and create new services and markets. · Establishing a framework for universal access. · Integrating a gender lens into the development of the legal and policy framework of digital technologies. · Encompass cybersecurity and resilience of the cyber-physical systems. · Assessment of cybersecurity risks in government digital infrastructure and platforms and policies and standards for mitigating vulnerabilities. · Support the preparation of a Cybersecurity Maturity Model Assessment, which will measure cyber preparedness and readiness, identify gaps, and provide specific action plan to improve cyber maturity.
Subcomponent 1.3: Capacity Building	· Capacity building for the TRA and CA; technical training, courses, and workshops. · Technical capacity to successfully execute the regulatory and operational functions required for the effective operation of the TRA and CA. · Build the capacity of the gender focal point at MTDE and gender inclusion in institutional development and capacity building activities. · TA activities for: (a) a capacity needs assessment gauging the skills and institutional capacity requirements of TRA and CA; (b) development of institutional capacity within TRA and CA through the recruitment of domain experts and the facilitation of knowledge transfer by mandating training and reinforcing capacity building in relevant Terms of Reference; (c) development of the CA's staff's operational capacity and the implementation of international standards for Code Signing, through the provision of technical training courses and workshops; and

	(d) development of the PA's technical and negotiation capacity including but not limited to spectrum and frequency management issues and implementation of the Significant Market Power regulations.
Component 2: Implementing Digital Infrastructure Solutions for Emergency Response, Recovery and Resilience **3.50 US$ million**	· Support digital infrastructure development and facilitate the use of digital technologies for building resilience and mitigating against emergencies and disasters · Facilitating the continuity of learning and digitally connecting communities and businesses. · Creation of integrated national Emergency Response Center (ERC). · Expansion of access to broadband connectivity through sustainable MFD approach. · Further expansion of good quality broadband connectivity through the development of fiber-optic infrastructure.
Subcomponent 2.1: Emergency Response Center (ERC) for Resilience	· Creation of the ERC which will integrate existing disaster, crisis, and medical emergency systems in WB&G. · Preparation of an Emergency Management Framework (EMF) and Action Plan that establishes a common approach for collaborative emergency management initiatives in support of a safe and resilient community. · Development of laws and regulations covering personal data protection standards and data exchange protocols, as well as safeguards for the exclusive use of the ERC's systems in response to emergencies. · Feasibility study that outlines the design specifications of the ERC, its software and hardware needs, as well as the political economy of the engagement and the feasibility of importing any hardware. · TA for the procurement of communications equipment and software, including a national emergency line, an emergency alert system, wireless emergency alerts, and e-calling and applications, etc. · Integration of Apple and Google's Emergency Location Services with the center's infrastructure to deploy Advanced Mobile Location in WB&G; · TA and Procurement activities (technical specification and purchase). · Capacity building activities for ERC staff for appropriate authority to respond to disasters and direct resources effectively. · Support the adoption of internationally recognized models for responding to emergencies, including an Incident Management System (IMS) and the adoption of an alerting protocol, such as Common Alerting Protocol, which interfaces with the IMS. · Support institutional coordination across all entities connected to the ERC.

	· Benefit from the opportunities for data driven response measures enabled by the e-government platform.
Subcomponent 2.2. Expanding Access to Broadband Connectivity through Sustainable Maximizing Finance for Development (MFD) Approach	· Purchase of broadband services in collaboration with telecom operators and Internet Service Providers (ISPs) for selected key and emergency beneficiaries and underserved public institutions, such as post-office networks managed by the MTDE.
	·
Component 3: Fostering User Centered E-Service Delivery **9.60US$ million**	· Establishment of an efficient, government-wide digital public platform that will allow for digital exchange of data across government entities and facilitate the provision of Government to Citizen, Government to Business and Government to Government services across the WB&G. · Build on and integrate the existing digital government infrastructure and systems including the forthcoming unified portal, payment gateway, private cloud platform and the road interoperability platform and data exchange service. · Establishment of a modern e-government procurement system.
Subcomponent 3.1: Enabling environment for accelerated development of E-services.	· Develop the strategy and enabling environment for e-government services. · Undertake necessary technical and feasibility studies for the MTDE to deliver e-government services. · Development of an e-government strategy; both in Arabic and English documents. · Outline the vision and direction for the further development of e-government; action plan; key steps, timelines and contingencies and dependencies to guide implementation. · Mapping of government sites with indicative needs for broadband continuity. · Gap analysis between the current situation and the “to be” situation for the future operating model and platform for e-government service delivery.

	· Development of a robust operating model for delivery of e-services including enterprise design architecture that will guide and prioritize the integration of re-usable components and cybersecurity measures and standards. · Market analysis of available technical foundations and platforms for the e-government platform with a special emphasis on automation and business process reengineering. · Develop an administrative service inventory, which catalogues all services provided across all ministries, departments and agencies; approximately 800 services. · Prioritize and select the pilot services for re-engineering and digitization.
Subcomponent 3.2: Delivering user-centric e-Services.	· Supporting investments in infrastructure, hardware, software and technical assistance to pilot a selected number of government's user-centric e-services. · Provision of technical solutions needed for the automation of e-services for select government institutions. · TA for business process re-engineering and its application to pilot services. · Integrating ICT systems and procedures, automation of processes, adopt a data driven approach including reuse of data, change the interface with the user or eliminating redundant procedures. · Piloting of a select number of transactional stage e-services including capacity building, communications and outreach. · Development of a number of stage one/emerging presence/informational services on the unified portal and mobile application to promote transparency and access to information about key administrative services. · Develop multi-channel Citizen Feedback Mechanisms (CFM) for e-services. · Development and deployment of tools to obtain real-time data from users on service quality, efficiency, and recommendations for improvement. · Training, outreach and awareness campaigns to increase uptake of the CFM tools. · MTDE extension of government cloud: · i) Review and implementation of the 2021 cloud readiness assessment actions and key recommendations for data governance: a) development of data classification policy and/or legal frameworks; (b) adoption of data classification frameworks across MDAs (this could be rolled out in phase or piloted if budget is limited); (c) capacity building. · ii) The purchase of cloud servers (hardware and software) · iii) Transformation of thirty selected post offices to become physical one stop shop e-service windows

Subcomponent 3.3: Development and implementation of priority e-government procurement (e-GP) functionalities in targeted high-spending agencies	· Support the development of priority functionalities and their implementation in selected high spending agencies as first phase of an e-government procurement (e-GP) system. · Digitization of National Standard Bidding Documents (DNSBD) for various types of procurement (works, goods, consultants' services and non-consulting services). · Support in tender preparation including EA and criteria, tender submission, tender evaluation workflow, etc. Development will be based on an open system design/architecture. · Agencies to be targeted for system use will include: the MoE, the MoH, the Ministry of Public Works, the Palestinian Water Authority, the Palestinian Energy and Natural Resources Authority and two large municipalities, in addition to the two central procurement agencies; namely the General Supplies Department in MoF and the Central Tendering Department in Ministry of Public Works. · Establish interoperability with relevant government systems, including budgeting module, e-payment and companies' registry. · Establish linkages with local commercial banks to facilitate electronic submission of bid securities. · Software development; upgrading of existing hardware; hiring of technical experts to support HCPPP in developing software reference architecture, business process engineering and in managing e-GP development and implementation. · Capacity development and training of target agencies, e-GP awareness campaign; and help desk service.
Component 4: Project Management and Implementation Support **2.5 US$ million**	· Creation of a dedicated PMIU in the MTDE responsible for overall project management and coordination, procurement, financial management, citizen engagement, environmental and social safeguards, Monitoring and Evaluation (M&E) and communication. · Prepare terms of reference or a MoU outlining roles and responsibilities for the MTDE and HCPPP. · Consider an agile approach for the project management and coordination and engaging with stakeholders and capacity building. · Provide support to project management related issues including project coordination, financial management, M&E, communications and outreach, citizen engagement, etc. · Emphasize gender equity in recruitment and retention by ensuring inclusion of women in all decision-making bodies under the project. · Capacity building for the MTDE e-government staff in IT policy, standards, management, incentives, and implementation to realize the digital government objectives.

	· Capacity building on stakeholder engagement, portfolio management, ICT procurement, common infrastructure and application operations and maintenance, formulating standards and guidelines, maintaining and mandating quality assurance and security.
Component 5 – Contingent Emergency Response Component **0.0 US$**	· In the context of the COVID-19 crisis, a Contingent Emergency Response Component (CERC) is added to the project structure to allow for quick disbursement of uncommitted balances as a response measure to any crisis (current or future). It will have an initial zero value but may be financed during the implementation of the project to allow for agile response to emerging events, with funds redirected from other components. Including CERC at the preparation stage, albeit with zero funding, provides for flexibility to respond to an imminent or actual emergency (such as COVID-19). The crisis response expenditures could cover, for instance, the facilitation of emergency payments to vulnerable groups of populations using mobile money; ensuring of business continuity of core government functions, when civil servants are required to continue home-based work; or supporting of MSMEs, particularly the most affected ones, to address their immediate liquidity challenges, reduce layoffs, and avoid bankruptcies. The CERC is not expected to finance civil engineering works that can induce risks and/or negative environmental and social impacts.

2.3 Project Beneficiaries

The Digital WB&G Project is designed to be people-centric, aiming to empower Palestinian citizens, including government employees to have access and use broadband and other digital services. The direct project beneficiaries include people and institutions who will be provided with training and broadband service subscriptions under the project and citizens and businesses benefiting from access to quality administrative e-services. The project will also benefit poor and vulnerable citizens.

Beneficiaries may also include SMEs that benefit from additional opportunities to participate in public tenders through the e-GP platform. The public sector will also benefit as line ministries and civil servants will benefit from improved tools and platforms as well as from the capacity building activities necessary to operate them. This will empower them to carry out their functions in a more effective and transparent manner.

The MTDE will be a direct beneficiary of the project in terms of strengthened institutional and technical capacity.

The project will further aim to start addressing the gender digital divide by empowering women, including through increased access to the internet and inclusive digital skills training programs. During project design and implementation, the project will ensure that women are fully represented in the target beneficiary groups and consider interventions to better enable access and adoption of the internet by women and girls.

2.4 Institutional and Implementation Arrangements

The overall Digital WB&G Project implementation arrangements would entail three levels. At the apex is the MTDE. PMIU will be established to coordinate the project implementation and reporting.

The MTDE will act as the formal Project Counterpart (PC) to the project and as the overall implementing entity through its PMIU. The PMIU will be created under the MTDE to oversee the overall implementation of the project with a centralized reporting and monitoring function.

The PMIU will be responsible for the project procurement and management, Environmental and Social compliance, and M&E including annual work planning and progress reporting and oversight of the Performance Contracts. The PMIU has been staffed accordingly and reports to the PC and the World Bank. The PMIU has concluded most of its recruitment and currently has 5 specialists: the PMIU Director, Financial Management Specialist, Procurement Specialist, Digital Transformation Specialist, M&E Specialist, and an Administrative Officer. The PMIU until August 2023 had an ESO who resigned at the time, the PMIU is currently undergoing hiring to fill the position. The PMIU will also hire an M&E specialist and a communications officer. The PMIU will coordinate with a range of stakeholders across government with technical leadership for specific components as relevant, including the HCPPP, which will be the counterpart for the development and implementation of (e-GP).

In addition, there will be separate contracts generated for the activities to be undertaken under the project, namely the contracts for the digital supply and installation services, and capacity building.

The PMIU and the Project Director will be responsible for the overall implementation of the environmental and social instruments of the project as well as reporting back to the Bank, the PMIU will recruit an Environment, Health and Social (EHS) officer who will be responsible for implementing all steps presented in the ESMF, the LMP and the SEP. The EHS officer will also be responsible for monitoring and reporting on compliance of environmental and social issues. In addition, the EHS officer is expected to create awareness among all implementing partners on environmental and social compliance and training necessary for its effective implementation.

Other related Palestinian ministries and authorities, contractors/suppliers, and Internet Service Providers (ISP), who are to be involved by the project components will be coordinated by the MTDE. The Higher Council for Public Procurement Policies (HCPPP) who is the main partner under component 3.3: Development and implementation of priority e-GP, its activities are under the responsibilities and commitment by HCPPP. The project is to support HCPPP in developing software reference architecture, business process reengineering and in managing e-GP development and implementation.

The implementation arrangements will be outlined in the Project Operations Manual (POM) for the project, which is a pre-requisite for project effectiveness. The manual is the responsibility of the MTDE.

Among the other overall management and monitoring required by the PMIU at the MTDE are:

- Design of project components, preparation of related works, including safeguard requirements;
- Stakeholder consultations and ongoing coordination;
- Concluding Memorandum of Understandings (MoUs) with the HCPPP and other involved institutions;
- Preparation and submission of the work plans for the project activities according to the Project Operation Manual (POM);
- Preparation and submission of the work progress and financial reports;
- Project procurement, including selection and contracting of contractors and suppliers;
- Financial management and control of project funds including;
- Day-to-day project management;
- Monitoring and Evaluation.
- Compliance with safeguard requirements

Figure 1 is schemata of the institutional structure for the implementation of the Digital WB&G Project. MTDE as the PC will be the signatory of the Project and the recipient of the World Bank's Grant, as well as reporting back to the Bank. The Figure clears also the involvement of the HCPPP in the activities related to the e-GP functionalities.

The project is supported by the PA and once the structure/setup is approved it will be announced, which is expected during the appraisal period of the project.

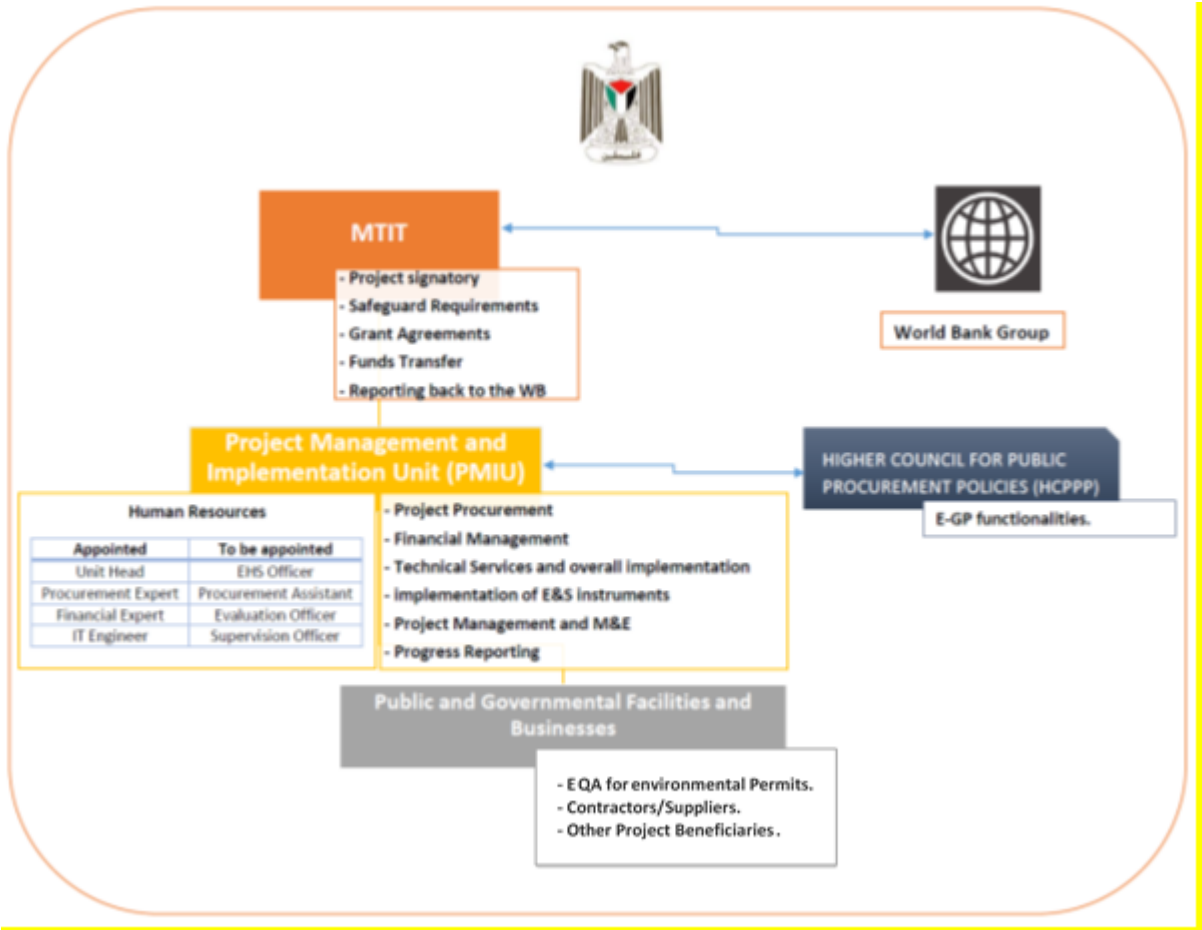

Figure 1: Scheme of the Implementation Arrangement and Functional Relationships

The EHS officer in the PMIU will Screen and review all proposed sub-projects in order to identify any that may carry the risk of adverse environmental and social impacts.

3. Environmental Policy and Legal Framework

3.1 Applicable Laws

The Digital WB&G Project will be implemented in compliance with applicable Palestinian laws, policies and regulations, as well as the applicable World Bank ESSs and relevant ratified international laws, protocols and treaties.

The Palestinian Authority (PA) is the borrower of the Project, while the MTDE is the executing agency and the Project Counterpart (PC). The legal affairs are administered through relevant ordinances and legislation applicable respectively to the Gaza Strip and the West Bank. These include the laws and ordinances adopted into the PA's legal regime in 1994, based on all laws in force prior to 1967.

The legal and institutional framework concerning the West Bank and Gaza Strip is quite exceptional. The laws and regulations applied vary, depending on whether the project is in Areas "A" "B" or "C". The relevant laws span the Ottoman regime, the British Mandatory period, the Jordanian administration of the West Bank, the Egyptian administration of the Gaza, the Israeli occupation of Palestine, and the PA administration over certain areas. However, it remains a challenge to seek remedies in the PA court system because of the uncertainty concerning enforcement and the institutional limitations of a court system operating under occupation.

3.2 Laws and Regulations Relating to Environmental Management

3.2.1 Palestinian Environment Law

The Palestinian environmental legal and administrative framework has taken major strides towards protecting environmental resources and institutionalizing their sustainable management. The Palestinian Environment Law (PEL) No 7 of 1999 is comprehensive, covering the main issues relevant to environmental protection and law enforcement. It has the following objectives:

- To protect the environment from all sorts and types of pollution;
- To protect public health and social welfare;
- To incorporate environmental resources protection in all social and economic development plans and promote sustainable development to protect the rights of future generations;
- To conserve ecologically sensitive areas, protecting biodiversity, and to rehabilitate environmentally damaged areas;
- To promote collection and publication of environmental information and to raise public awareness of environmental issues.

The PEL addresses various environmental management including:

- Management and protection of various resources. Issues covered are related to land environment, air environment, water resources and aquatic environment, natural, archeological, and historical heritage protection;
- Environmental Impact Assessment (EIA) and auditing, permitting of development projects, monitoring of environmental resources and their parameters;
- Other issues addressed by the legislation include emergency preparedness, public participation, research training and public education.

Article 45 of the PEL empowers EQA to set standards for EIA studies and to prepare the relevant rules and procedures for such studies. Articles 12 and 13 provide for the disposal of hazardous materials only under the umbrella of the EQA approval, in coordination with the specialized agencies.

The PEL further requires the EQA to cooperate with the competent authorities to follow up on the implementation of decisions that are issued concerning the environmental impact. The EQA is also required to monitor compliance with approved specifications, standards and instructions for the protection of the environment and vital resources. The law further empowers EQA inspectors and other appointed inspectors to record the environmental violations and crimes that may take place and violate this law. The EQA inspectors shall also have, in cooperation with the competent departments and authorities, right of entry into the installations for the purpose of: inspecting them, taking samples, carrying out measurements, and ascertaining the application of the standards and conditions of the environment protection and prevention of pollution.

EQA is also empowered to stop, for a period not exceeding two weeks, any project works that could constitute a serious hazard to the environment. The stoppage can only be extended by a judicial order from the competent court.

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".

In accordance with Articles 12, and 13, the disposal of any hazardous substance or waste should not be done, unless such a process is conformed with the terms, regulations, instructions and norms specified by EQA, in coordination with specialized agencies. Moreover, Article 47, EQA, in coordination with appropriate authorities, is responsible for determining projects that require environmental approvals prior to licensing. The current project is bounded by Article 47.

3.2.2 Palestinian Environmental Assessment Policy

The Palestinian Environmental Assessment Policy (PEAP), approved through resolution No: 27-23/4/2000, has the following goals:

- Ensuring that development activities improve the standard of life, without negatively affecting the social, cultural and historical values of people;
- Preserving and sustaining the natural environment;
- Conserving biodiversity, landscapes and the sustainable use of natural resources;
- Avoiding irreversible environmental damage, and minimizing reversible environmental damage, from development activities.

EQA applies the following PEAP-defined screening process, based on the requirements of relevant land use plans, to determine whether an Initial Environmental Examination (IEE) report or an EIA report is required. The screening process determines whether the project is likely to:

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

The IEE is for projects where significant environmental impacts are uncertain, or where compliance with environmental regulations must be ensured, whereas an EIA is required for projects, which are likely to have significant environmental impacts. **Figure 2** depicts the EA administrative process as to EQA.

The PEAP stated that the stakeholder consultation is mandatory when undertaking an EIA. In consultation with the proponent and the EA Committee, EQA determines the minimum requirements for stakeholder consultation. At the minimum, the proponent must meet with the principal stakeholders to inform them about the proposed project and to solicit their views about it. The methods and results of the consultations must be documented.

According to the PEAP, the MTDE is 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. The digital WB&G project is not within the list of projects that require detailed EA. 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.

All mentioned laws, orders and regulations have enforcement power, the main base of the enforcement system is the Palestinian Public Health Law No 20 and the Municipality regulatory system. Enforcement actions are to be taken by the municipality directly in some cases and through the court, the police and sometimes the district governor for more complicated cases.

3.2.3 Public and Occupational Health and Safety

The Public Health Law No. 20, 2004 contains various articles that relate to project activities. Compliance with these requirements is mandatory and shall be considered by all projects during all phases, installation, operation, etc.

Article 31 states that all works that may have an impact on public or environmental health must obtain a written permit from the MoH. Article 32 is related to the OHS regulations that must be applied at workplaces. Article 36 is related to environmental and health awareness and instructions. Articles 39 and 40 are related to control of the environment and health-related pollution.

The Palestinian Labor Law No. 7, 2000 is mandatory for implementation during project execution. As per Article 34, workers must comply with all OHS instructions at the workplace and Articles 90, 91 and 92 are related to the OHS requirements that the employer must respect.

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

- Decree No. 15 - Maintenance and cleanliness of worker areas and equipment, provision of drinking water, gender-separated washrooms, dining areas, and locker room specifications.
- Council of Ministers No. 22 of 2003 - Initial medical examinations for workers, specifying the types of exams based on occupation, gender, and age.
- Council of Ministers No. 24 of 2003 - Periodic medical checkups for workers, mandated biennially for some, annually or semi-annually for others, based on industry.
- Council of Ministers No. 17 of 2003 - Requirements for first aid equipment and kits at facilities, including accessibility, content, labelling, and usage training.
- Council of Ministers No. 49 of 2004 - Preventive measures against work hazards, career diseases, and work accidents, including PPE provision and worker training.
- Council of Ministers No. 21 of 2003 - Building safety measures to mitigate worker health and safety risks, including machinery use, noise, and structural safety.
- Minister of Labor No. 1 of 2004 - Prohibition of employing children under 18 in hazardous occupations, with specific industries outlined where prohibition is enforced.
- Council of Ministers No. 47 of 2004 - Mandates on reporting occupational diseases and injuries to the Ministry of Labor, including timelines and reporting standards.
- Minister of Labor No. 1 of 2005 - Safety precautions for workers at construction sites, detailing required equipment, safety measures, and hazard mitigation.
- Minister of Labor Nos. 2-6 of 2005 - Defines chemical exposure limits and safety standards for ionizing radiation, noise, light brightness, and temperature at workplaces.

3.2.4 Management of Hazardous Waste (2021)

Palestinian Cabinet Decree on the Management of Hazardous Waste – No. 6, 2021 The decree sets the basis for the management and treatment of hazardous waste, it imposes licensing and

environmental approval procedures for hazardous waste management facilities and activities. The decree sets forward the storage, segregation, and treatment requirements for hazardous waste. The decree additionally defines the requirements for the transportation of hazardous waste, and in line with the Basel Convention, prohibits the export or import of hazardous waste without obtaining the proper permits under specified conditions.

3.2.5. Palestinian Cabinet Decree on Adopting the General Policy for the Disposal and Treatment of Electronic Waste – June 2021 (02/113)

This decree sets the requirements for the management and disposal of e-waste generated from governmental and public institutions and provides the definition of e-waste as hazardous waste. The decree sets forward the collection, storage, transportation, auctioning, and disposal requirements.

This decree defines the e-waste management required from MTDE, and other ministries and public institutions for the e-waste generated from their operations. As it is the main policy targeting e-waste management, its requirements have been incorporated in this project specific E-waste Management Plan, and a further description of the decree is provided in chapter 5.

Expected time
Project Proponent or Consultant (1 week)
Environment Quality Authority (EQA) 1-2 weeks
Proponent or Accredited Consultant 2-3 weeks
EQA (4-6 weeks) each time
EQA and the Environmental Assessment Committee (4-6 weeks)
EQA and Permitting Authorities 1-2 weeks
EQA and Related Governmental Bodies Variable
Total (12-18) weeks

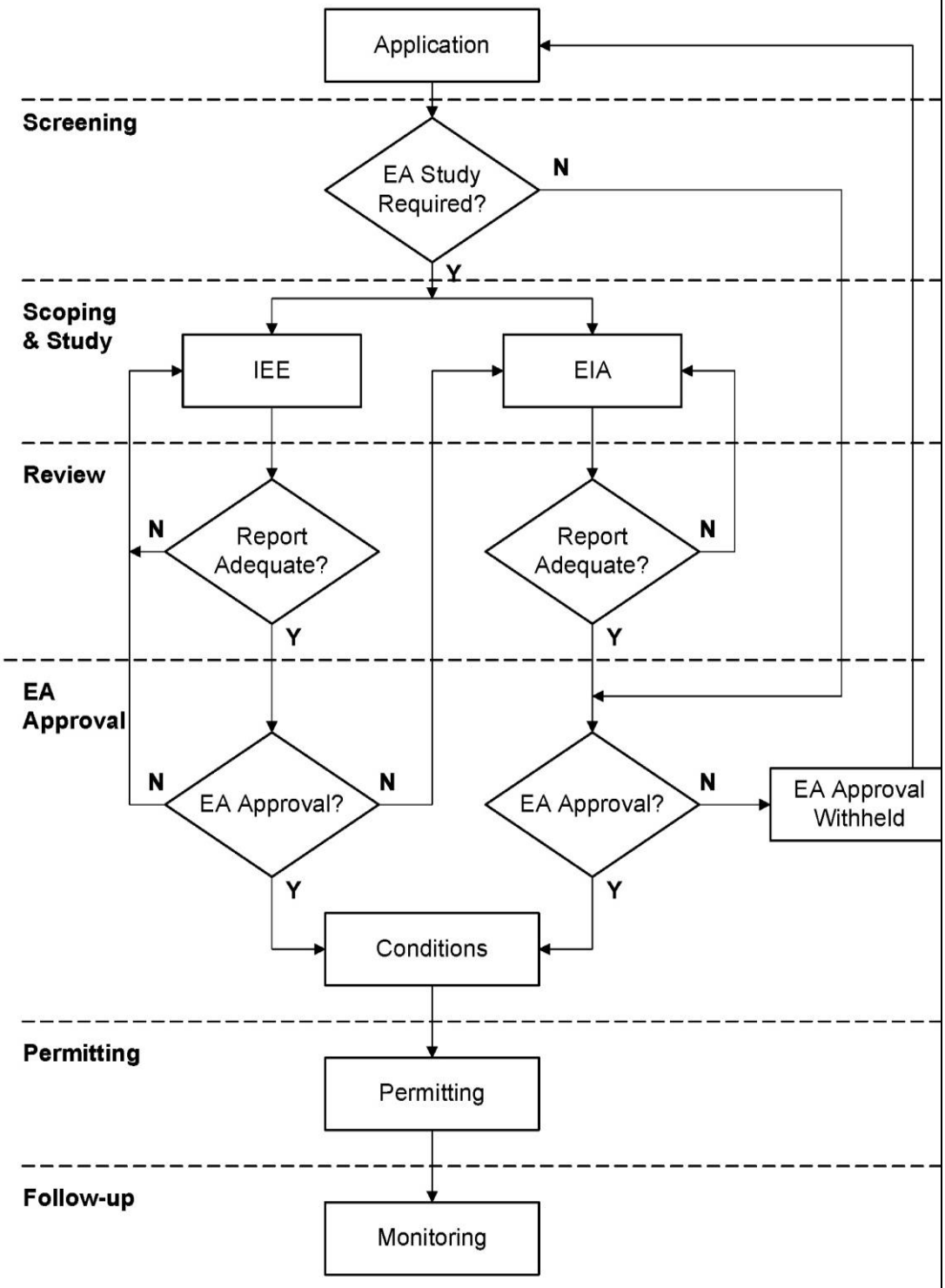

Figure 2: EA administrative process, EQA Palestine

3.2.5 Grievance, Complaints, and Disputes Resolution

The resolution of the Palestinian Cabinet No. 8 of 2016 on the Regulation of Complaints has been adopted by the PA and defined the acting body in the government to deal with complaints. This regulation sets out the procedure by which public complaints shall be handled and resolved and states the policies for the improvement of the performance of the Palestinian Ministries and Authorities, as well as NGOs. Project Affected People/Parties (PAP) have the right to complain at any ministry or authority on environmental or social issues.

3.2.6 Other Laws and Regulations relating to Environment Management

The Public Health Law No. 20 for 2004 has articulated that it is part of the MoH tasks and authorities to license the establishments specialized in waste collections, method of waste treatment, and disposal.

It also states that it is under MoH authority in cooperation with the competent authorities to specify the rules and conditions of transferring, saving, treatment or disposal of the hazardous waste. No one is allowed to do what is stated here above unless it is in accordance with the conditions and rules.

In the Palestinian legislation, e-waste is considered entirely hazardous and its importation in the Palestinian Territory is illegal (by reference to Basel Convention adopted by the PA). Although mentioned in the Environmental Law of 1999 as a component of hazardous waste, there is no strategy, no specific law or article, nor technical specification for E-waste.

Among the other related laws that need to be considered in environmental monitoring are Jordanian Heritage Law No. 51 for the year 1966, Article 15; the Jordanian Law No. 79 of 1966; the Cities, the Villages and Buildings Regulating Law; and the Buildings and Regulation Bylaw for Local Authorities No. 5.

3.3 Institutional Framework

The Environment Quality Authority (EQA) is the main Authority responsible for environmental and social issues in Palestine. EQA has replaced the former Ministry of Environmental Affairs (MEnA), which was established in August 1998 by a decree from the President of the Palestinian National Authority.

EQA plays an important role as the planning, coordinating and executive body to improve environmental standards and attitudes in Palestine. Being the central representative authoritative body responsible for all environmental issues in Palestine, EQA addresses all environmental constraints, including natural resource depletion and environmental pollution, as an approach towards sustainable development.

3.3.1 Information and Communication Technology Regulatory Framework

The Palestinian telecom sector is governed by the Decree No. (37) of 2021 regarding communications and information technology and it amendment Decree Law No. (23) of 2022.The MTDE has been engaged since 2005 in drafting a legal and regulatory framework, including the establishment of the independent Telecommunications and Information Technology Regulatory Commission (TITRC); In accordance with the Law of December 12, 2021, concerning the Telecommunications and Information Technology and creating the Telecommunications Regulatory Authority (TRA), the acronym "TITRA" is replaced with "TRA", as reflected in the Amendment No. 1 to the Trust Fund Grant Agreement. The modification of the name does not change the functions and capacity of the authority.

Decree No (37) 2021 regarding communications and information technology aims to regulate the telecommunications and IT sectors, in line with technological development, and to ensure the provision of high-quality telecommunications and IT services in appropriate, fair and competitive terms and prices. Monitoring the performance of licensed companies and protecting beneficiaries and subscribers of telecommunications services and information technology, creating competitive environment for establishing telecommunication networks, providing telecommunication and information technology services and prevent monopoly. Encouraging investment in telecommunication and information technology sector and ensuring investor protection, Ensuring providing telecommunication services for all areas by achieving comprehensive telecommunication services; and building and developing creativity and innovation in telecommunication and information technology industry

The approval of decree No (37) 2021 and it amendment Decree No. (23) 2022 should overcome the following previously address weakness in the IT sector : (i) a lack of responsiveness in addressing sector-specific technical and legal issues; (ii) a negative impact on the transparency of the licensing process; and (iii) an absence of regulation vis-à-vis Palestine Telecommunications' Company (Paltel) dominant position and therefore negative impact on consumers in terms of prices and quality of service Moving to e-service delivery and open and shared data, a comprehensive legal and regulatory framework to support the digital transformation agenda is currently incomplete; missing elements including the draft laws on access to information and protection of personal data. The MTDE is working on filling the gaps in elements of enabling legislation; such as regulations enabling single sign on, digital signature, and digital payments in coordination with different bodies. The PA is also working on developing an enabling legal framework to regulate some important elements of the digital economy; such as access to information and personal data protection.

The Digital WB&G Project, through its first component, aims at Enabling Legal and Regulatory Environment for Digital Economy by building the analog foundations of the digital economy; focusing on creating an enabling policy, legal, and regulatory environment and strengthening institutional capacity. Subcomponent activities include establishing and making operational the TRA and providing support to the MTDE and other key stakeholders in developing strategies and analytical studies, strengthening their technical capacity, and procuring of equipment. This will strengthen the Ministry's capacity to develop sectoral strategies and monitor their implementations, strengthen TRA's capacity

to regulate and oversee the developments in the sector's independence from the Ministry, and facilitate the emergence of digital economy in WB&G. These measures are particularly important in the context of mobilizing and responding to national and international crises and emergencies, like the COVID-19 pandemic, by helping to warn the population and increasing the efficiency of first responders' interventions. They are also expected to contribute to strengthening the resilience of the networks, reducing the operators' operating costs, and increasing competition.

3.4 World Bank Project Categories and ESSs

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 (ESSs) that are designed to support Borrowers' projects.

Annex 11.1 brings definitions of the ten World Bank ESSs. The definition is only to clarify what is meant by each. The table in the annex outlines the core requirements under each standard.

The ESS1 on Environmental and Social Risks and Impacts Assessment and Management categorizes all projects (including projects involving Financial Intermediaries) into four categories, depending on the type, location, sensitivity, and scale of the project, the nature and magnitude of its potential environmental and social impacts, and the capacity and commitment of the borrower. These categories are: High Risk, Substantial Risk, Moderate Risk or Low Risk.

The Bank will require the Borrower to carry out appropriate environmental and social assessment of projects, and to prepare and implement such projects, as follows:

- *High Risk* sub-projects, in accordance with the ESSs;
- *Substantial Risk, Moderate Risk and Low Risk* projects, in accordance with national law and any requirements of the ESSs that the Bank deems relevant to such projects.

If the Bank is not satisfied that adequate capacity exists on the part of the Borrower, all High Risk and as appropriate, Substantial Risk projects will be subject to prior review and approval by the Bank until it is established the adequate capacity exists.

ESS1 requires that the proposed project being screened early for potential negative impacts and select appropriate instruments to assess, minimize and mitigate potentially adverse impacts. It further requires early consultations with the project affected groups/peoples and relevant NGOs.

The examination and assessment of the projects of the Digital WB&G Project shall be conducted in light of the World Bank's Environmental and Social Framework and the EIA guidelines of EQA. The assessment shall be addressed through:

- Reviewing the ten ESSs and determining the ESSs that are relevant and applicable to the project. Mitigating measures have been identified accordingly;

- Describing the issues and impacts associated with the project. Identifying and describing any potential large scale, cumulative, significant and/or irreversible impacts;
- Describing the potential indirect and/or long term impacts due to anticipated future activities in the project area;
- Describing the measures taken to address the issues. Providing an assessment of project proponent capacity to plan and implement the measures;
- Identifying the key stakeholders and describing the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on the potentially affected people.

This ESMF is the environmental and social instrument prepared based on the ESS1 requirements and is to be applied to the screening and assessment of the sub-projects to be financed by the Digital WB&G Project. When there is discrepancy between PA's legislation and World Bank's ESSs, the most stringent will apply.

3.4.1 Applicable World Bank Environmental and Social Standards

The purpose of an environmental impact assessment is to identify and measure those effects by projects engineering that cannot be eliminated; thus, the result of the exercise, allows choosing the adequate engineering and/or methods to utilize in order to eliminate and/or minimize those relevant impacts generated by the subproject activities. The impact assessment was based on an analysis of the impacts of the Project on the existing environment. A description of the existing conditions for each valued aspect was provided as a basis for the evaluation of impacts. A valued aspect is the way the project activity impacts the environment.

The World Bank's Environmental and Social Standards relevant to the Digital WB&G Project are; ESS1 on Assessment and Management of Environmental and Social Risks and Impacts, ESS2 on Labor and Working Conditions, ESS3 on Resource Efficiency and Pollution Prevention and Management, ESS4 on Community Health and Safety, and ESS10 on Stakeholder Engagement and Information Disclosure. The other five ESSs (ESS5, ESS6, ESS7, ESS8, and ESS9) are not relevant to the project. **Table 3** indicates the applicability of ESSs to the Digital WB&G Project.

The project subcomponents 2 and 3 include small scale works as mentioned above. Project subcomponents 2 and 3 are expected to include ergonomics and furniture, hardware IT infrastructure, and network infrastructure, particular for the Emergency Response Center, hardware and software related to the delivery of e-government services and platforms, and installation of equipment and minor refurbishment to establish one-stop-shops

The environmental impacts associated with the installation of these equipment are related to the, waste management especially e-waste generated from replacement of old computers and digital devices in addition to risk of fire safety in buildings hosting equipment and one-stop-shops and (i) risks related to social exclusion in various forms; (ii) risk of the exclusion of women such as access to broadband services, internet connectivity, e-services and job opportunities; (iii) improper community consultation and grassroots participation; (iv) risk of exposure of workers and vulnerable communities

to sexual harassment or exploitation; and (v) risks related to labor and working conditions for project contracted workers or the PMIU employees, from the end of life of equipment, and impacts on OHS.

The social risks are summarized under ESS1 in Table 3 below

Table 3: Applicability of the World Bank Standards to the Project Activities

ESS1	***Environmental and Social Assessment and Management*** As detailed in Table 2 above and as assessed and analyzed in Table 4 below, the Digital WB&G Project include interventions for installation service delivery types of activities or supply of equipment and installations. Enabling e-services and establishing system that ensure the application of quality standards and quality assurance in public and private providers in ICT. The anticipated potential environmental impacts may include: (i) generation of solid waste from retrofitting and installation of equipment and from the end of life of equipment; (ii) management and disposal of e-waste as a result of the replacement of old equipment and from the end of life of equipment; (iii) nuisance related to vibration and noise during installation activities; (iv) OHS risks during installation activities and risk of fire safety in buildings hosting equipment and one-stop-shops. The anticipated social impacts may include: (i) risks related to social exclusion in various forms; (ii) risk of the exclusion of women such as access to broadband services, internet connectivity, e-services and job opportunities; (iii) improper community consultation and grassroots participation; (iv) risk of exposure of workers and vulnerable communities to sexual harassment or exploitation; and (v) risks related to labor and working conditions for project contracted workers or the PMIU employees, and (vi) risks related to data privacy and security. If the CERC (component 5) is activated; though the ESMF may have to be updated depending on the scope of the activities included in the CERC component. The risks associated with this kind of infrastructure are assigned to be moderate risk category under ESS1.
ESS2	***Labor and Working Conditions*** This standard is relevant to the project, given that the project will hire direct and indirect workers that will be engaged by the PMIU/MTDE to work specifically in relation to the project. OHS risks are: Related to the installation activities of internet connections, and digital systems and their infrastructure, such as use of equipment, exposure to noise, exposure to electrical hazards from the use of tools and machinery, traffic accidents, working on steel erection (towers) hazards, etc. Also, interactions in the office environment or exposure of project workers to populations, may pose a certain level of health and safety risk associated with communicable diseases infection, especially if proper hygiene, safety precautions and social distancing measures are not adhered to. Labor and working conditions: The project will involve civil servants working at the MTDE and HCPPP responsible for project implementation and contracted workers engaged with suppliers/installation contractors. Ensuring that the terms and conditions for these workers are in accordance with the requirements of national law and ESS2 (covering terms and conditions of employment; non-discrimination and equal opportunities; discrimination in relation to recruitment; prohibition of forced labor and child labor; indiscriminate benefits;

	grievances and workers' rights), is important. Further, the direct workers would be at risk of stress, fatigue or burnout due to overworking to manage the project activities. Gender-based Violence (GBV)/Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH): The project is assessed as Moderate on GBV/SEA/SH risks. The project level GRM should include specific procedures for GBV including confidential reporting and ethical documentation of GBV cases. The project will not experience any labor influx issues or issues related to the presence of migrant workers and therefore fear for the dangerous diseases to be spread out to the other workers and community is not expected. With respect to child labor, based on current conditions in the sector, it is assessed that the risk of child or forced labor is negligible and will be managed through the application of the national laws and legislations. Accordingly, the Labor Management Procedures (LMP) document has been prepared to establish and maintain a safe working environment, covering OHS measures and procedures; terms and condition of employment; non-discrimination and equal opportunities; prohibition of forced labor & child labor; and workers' rights for direct, contracted and community workers, in a manner consistent with ESS2.
ESS3	***Resource Efficiency and Pollution Prevention and Management*** This standard is relevant to the project. The project scope support under component 2 and 3 hardware IT infrastructure, and network infrastructure, particular for the Emergency Response Center, data center, one-stop-shop and hardware and software related to the delivery of e-government services and platforms. The environmental impacts associated with the installation of this equipment are related to waste management, especially e-waste generated from replacement of old computers and digital devices and from the end of life of equipment. The project seeks to avoid, minimize, and/or manage project-related non-hazardous and hazardous waste, including e-waste.
ESS4	***Community Health and Safety*** Although most of the work will be confined to the existing establishments and businesses (government institutions), some of the associated activities such as transportation of materials and equipment may increase the risk of traffic hazards. This standard also covers issues related to Exposure of youth, including vulnerable youth and women to possible GBV and SEA/SH concerns, which are relevant to the project.
ESS5	***Land Acquisitions, Restrictions on Land Use and Involuntary Resettlement*** This standard is Not Relevant. There are no locations where land acquisition or resettlement is required. The installation works and O&M activities will be within the footprint of the existing facilities. Continued access to affected businesses will be ensured in case during the installation the access to the adjacent businesses will be affected.
ESS6	***Biodiversity Conservation and Sustainable Management of Living Natural Resources*** This standard is Not Relevant. During installation and operation stages, there are no natural or critical habitats sites already identified within the project sites which may be adversely

	affected since the works will be within the footprint of existing facilities and no excavation will be carried out.
ESS7	**Indigenous Peoples/ Local Traditional Communities and Sub-Saharan** This standard is Not Relevant. ESS7 is not relevant to the project as there are no indigenous peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area.
ESS8	***Cultural Heritage*** This standard is not relevant. The project does not likely envisage any impacts on physical, cultural, and/or archaeological sites since the works will be within the footprint of existing facilities.
ESS9	***Financial Intermediaries*** This standard is Not Relevant to the project as the project will not use financial intermediaries as an instrument for channeling funds.
ESS10	***Stakeholder Engagement and Information Disclosure*** The standard is relevant. A Stakeholder Engagement Plan (SEP) and a Grievance Redress Mechanism (GRM) have been prepared for the project. These documents and other instruments (LMP, ESMF) will be disclosed. In addition, consultations with the relevant stakeholders have been held.

4. Baseline Environmental and Social Data

4.1 General

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

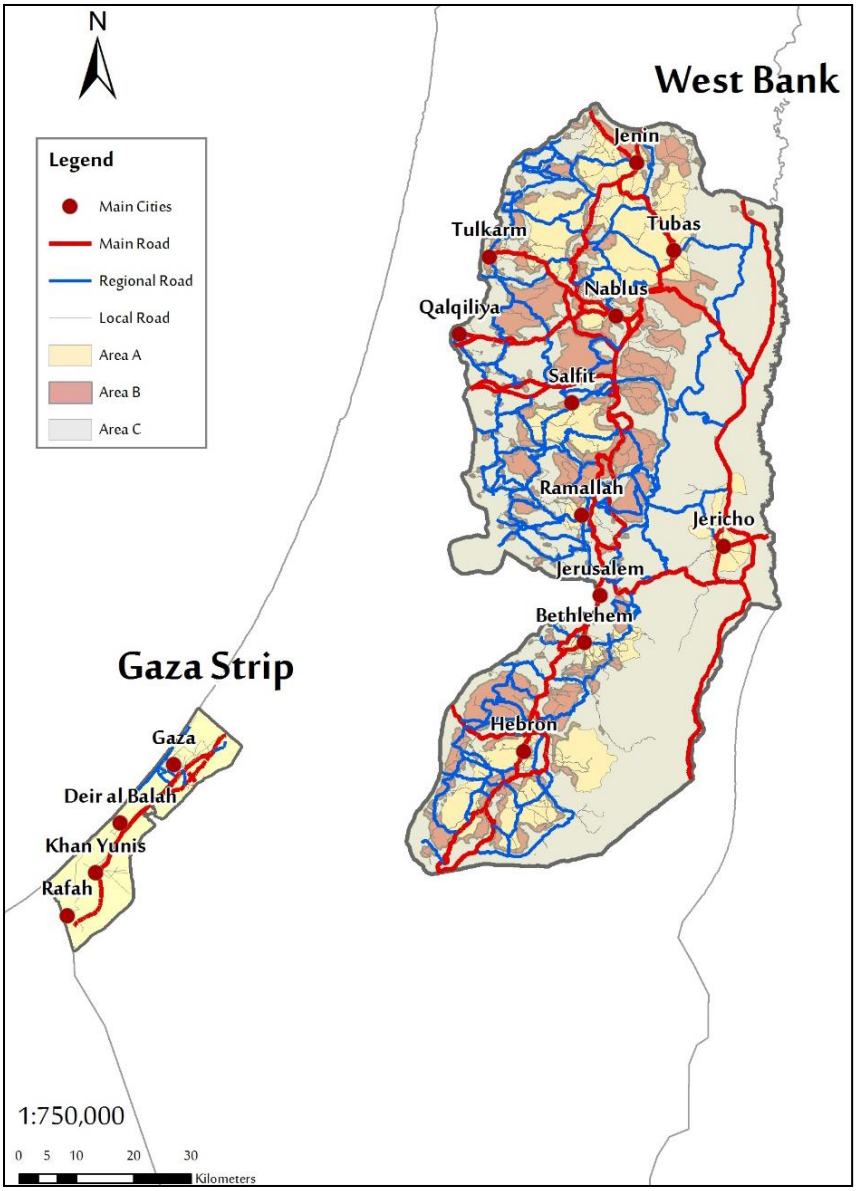

Figure 3: West Bank and Gaza (WB&G)

4.2 Socio-Economic Context[2]

The COVID-19 crisis in the WB&G is having a damaging impact on an already constrained economy struggling to emerge from a liquidity crisis in 2019, making the immediate prospects for the Palestinian people difficult. Necessary measures to contain the COVID-19 crisis have contributed to sharp declines in activity for an economy already facing constraints on movements and access that left it operating well below potential. The constraints have been hollowing out the productive sectors and left the economy reliant on consumption-driven growth. According to the latest available figures,

[2] Reference to Environmental and Social Management Framework (ESMF) January 2021

in 2019, this situation was compounded by the liquidity crisis that faced the PA following the clearance revenue standoff. As a result, real growth in the Palestinian territories in 2019 was a mere 1 percent, with Gaza registering minimal growth following a steep recession in 2018, and growth in the West Bank reaching 1.2%; the lowest level since 2003. For 2020, the prospects depend on how long the COVID-19 containment measures are in place and how quickly the economy responds once they are lifted. While during the pre-COVID-19 the WB&G had projected 2.5% growth in the coming year, full year decline of at least 7.6% is now projected, based on a gradual return to normality from the containment, and up to 11% in the case of a slower recovery or further restrictions due to another outbreak. In either case, the reduction in per capita income and the rise in unemployment and poverty will be substantial.

The fiscal position of the PA, which was already extremely vulnerable following the liquidity shock in 2019, is now facing a further deterioration in the wake of the COVID-19 crisis. The liquidity shock that hits the PA in 2019 led to the PA's deficit after aid increasing to around US$800 million or 4.6% of GDP. Much of the financing need was filled through the irregular practice of accumulating expenditure arrears, which has meant that the fiscal position is poorly placed to cope with the additional challenges posed by the COVID-19 crisis. The crisis will lead to a substantial reduction in PA revenues in 2020, but will also increase demands for expenditures on health, social assistance, and support for the private sector. The Word Bank estimates that the PA could be facing a financing gap in 2020 of over US$1.5 billion to adequately address these needs. It will be important for the PA to prioritize expenditure and reallocate away from its previous plans to help meet the financing demands. However, even with a significant reallocation of expenditure a sizeable financing gap could be expected. With further domestic borrowing running into limits, the PA could focus its efforts, besides reprioritization, on mobilizing donor resources and working with Israel to address outstanding fiscal leakages as these can be an important source of space.

The challenge posed for the Palestinian economy by the COVID-19 crisis is on top of an already complex situation, in which the digital economy offers promising opportunities for both the response to and the recovery from the pandemic. Digital technologies and relevant digital policies are playing a key role in mitigating the crisis through digital connectivity and essential digital solutions. While navigating the COVID-19 crisis is the immediate challenge, there should remain an eye to longer-term economic needs. The full potential of the Palestinian economy will not be achieved until there is an agreement that allows the restrictions on movement and access of goods and people to be lifted.

The WB&G are heavily populated, with a large youth population and a youth unemployment rate of approximately 37%, higher than the regional average of 26.2% in the Middle East and North Africa region. **As of 2019, the WB&G have 3,000 graduates in science, technology, engineering and mathematics per year who can benefit from and contribute to a digital economy**. Digital economy solutions can boost innovation, enhance competition and pave the way for new opportunities for the region's educated youth by way of enhanced economic growth and better functioning domestic labor markets.

4.3 Status of Digital Situation and Transformation

The WB&G are at risk of being left behind in the emergence of a vibrant, inclusive and safe digital economy. As to the latest international ICT Development Index published in 2017, the WB&G is ranked 123 out of 176 countries, well below the average compared to other Arab States or developing countries. According to the global cyber security index 2020 by the ITU, Palestine ranked 121 out of 182 globally and 15th out of 22 countries in the Arab region

The WB&G is not yet included in the international United Nations Department of Economic and Social Affairs e-Government Development Index. WB&G appears to be emerging in the digital infrastructure, the digital platform, digital entrepreneurship, and digital skills pillars, while the development of the digital financial services pillar is still at the nascent stage.

Digital infrastructure is foundational to the development of the digital economy, as it allows citizens, businesses and governments to connect online to affordable and good quality broadband and stay digitally enabled. Studies and data analysis have shown that not all Palestinians have access to the internet, which is essential for utilizing available electronic services. There are limitations due to infrastructure constraints. It's important to note that according to the Palestinian Central Bureau of Statistics, in 2022, 92% of households are connected to the internet, and the percentage of individuals aged 10 and above who used the internet from any location in Palestine was 89%.

While under existing agreements the PA has the right to build and operate independent telecommunications infrastructure and establish its own telecom policies, Israel has decision-making power over the frequency spectrum. This explains why mobile broadband (3G) services were only deployed in January 2018, following the narrow allocation of frequency bands by Israel for access to a national mobile broadband 3G network and only in West Bank while Gaza is still operating on 2G. The Palestinian operators also face import and construction restrictions and unfair market competition from Israeli operators, who can offer 4G and 5G services and have an estimated of more than 20% mobile broadband market share in the West Bank

The mobile market is a competitive market, with the two Palestinian operators Jawwal (Paltel's subsidiary) and Ooredoo Palestine (former Wataniya Mobile Palestine). By mid 2020, the total mobile connections passed 86%.

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Until December 2021, Fixed broadband access has been available through Digital subscriber line technology, installed by Paltel, which has been a monopoly over fixed-line telecommunications service provision, over the existing copper local loop. Paltel provided internet services both directly and via a subsidiary Internet Service Provider (ISP), Hadara, while it also resells its services to private ISPs through the Bit-stream Service Access (BSA

In December 2021, MTDE opened the fixed broadband market for competition, by allowing Service Providers (ISPs) to deploy their own fiber infrastructure and enabling them to also use the existing infrastructure (right of ways, poles, and fiber) from the electricity companies, where ISPs consequently signed bilateral agreements, some exclusive, with electricity companies.

The proposed restructuring for the project is triggered by the MTDE's decision to open the fixed broadband infrastructure market to competition. MTDE's decision made obsolete the previous approach based on the Palestinian cabinet resolution from February 2020 to create a National Fiberoptic Company (NFC) as a wholesale fixed broadband infrastructure provider, which was pursued at the time of Project preparation. The NFC mandate included expanding a regulated wholesale fiberoptic infrastructure using excess public fiber optic capacity (e.g., along the energy grid) across West Bank and Gaza and providing regulated wholesale services to licensed internet service providers (ISPs) who would be providing broadband services to end users. The NFC infrastructure would have enabled ISPs to compete at the retail service level only, as opposed to retail level and infrastructure level.

In 2013, the WB&G implemented the interoperability platform and framework to allow automated data exchange between various public sector agencies and provide the basis for integrated service delivery. To support a whole of government transformation, interagency working groups were created for both policy-making and technical discussions. The core digital systems of the PA are also in place with basic functionalities such as those for public financial management, human resource management, and additional sectoral management information systems (such as health and social protection) and data registries for citizens, vehicles, business, etc.

Most of the ministries and subordinated agencies have internal IT departments that are responsible for sector systems, services and management. While this has resulted in some islands of excellence, this siloed approach to digital public platforms is inefficient and costly, with duplicative investments in infrastructure, hardware and software that may be outdated or incompatible with other systems. Further, there is an overall lack of skills and competencies.

Fostering digital transformation of Government in the WB&G faces a range of challenges, including high-level leadership, institutional coordination, and the enabling laws and regulations underpinning the development, deployment and use of digital public platforms.

4.4 Status of Collection, Treatment and Disposal of e-Waste

This type of waste reflects the complexity of solid waste management in Palestine. Waste from Electronic and Electrical Equipment (EEE) or e-waste includes all electronic and electrical devices like computers, cell phones, TVs, radios, printers and calculators, motors, etc. and any device containing electrical or mechanical boards, such as air conditioning. In general, e-waste includes items containing hazardous compounds (such as refrigerators, air conditioning systems or TV with cathode ray tube)

and exclusively nonhazardous ones (washing machines, computers, tablets, and hair dryers for example).

In Palestine, the e-waste sector is characterized by its informality, social tribe ties among big families, as well as by the lack of proper regulation to ensure public health and environmental protection.

The main locations, where e-waste is traded and treated are Beit Awwa, Idhna, Deir Samit, Al Kum and Beit Maqdum in Hebron Governorate. Every year, about 70,000 to 80,000 tons of e-materials are sent to these villages (90% coming from Israel).

The collected items are sold to recyclers and workshops in Beit Awwa bazar market, then treated in other places. Some appliances are repaired and sold as second-hand products, others are dismantled to recover spare parts, and the remaining is smashed to recover the raw materials.

It is estimated that the treatment of e-waste involves about 150-200 workshops, 1,000-2,000 permanent workers, as well as more than 5,000 non-permanent workers and 100 workers under the age of 18, contributing to one third of the whole local economy.

Secondary materials are mainly metals (like nickel, copper and lead) and plastics, which are either sold locally or transported to Israel, through Israeli brokers (based in settlements) or Palestinian traders with official authorization, where they are sold to recycling factories or sent abroad (India, China). Metal selling prices follow international market prices. The treatment of the e-material consists in dismantling, cable processing and clean metal assembly, through a primitive process with negative impacts on the environment and human health. By-products are either sent to Tarqumya Transfer Station and/or Al Minya Sanitary Landfill or burnt or illegally dumped. However, the Green Police created by EQA managed to reduce the illegal burning and dumping by 70% - 80%. The main characteristics of the e-waste treatment are:

- There is about 6,535 tons/month entering in the three localities (from Israel and the Palestinian Territories).
- The composition of the received waste is in average:
    - Car motors 50%;
    - Air conditioner 25%;
    - Cables 10%;
    - TVs 2.5%;
    - Refrigerators 10%;
    - Cell Phones 2.5%;
    - Computers 25% in Beit Awwa, 2.5% in Idhna;
    - Batteries 25% in Deir Sumit.
- The majority of the collected waste is recycled/treated (90%), the rest goes to landfill or dumping sites;
- The majority of workshops has no periodic records of the waste coming in and out;
- Most of the workshops are not aware of e-waste regulations;
- Most of them say there is no monitoring by Palestinian agencies;

- The majority of workers are doing these activities for job opportunities;
- About 80% know about the health issues related to such activities;
- The majority of the workers implement manual treatment activities.

Concerning e-waste, there are two officially registered plants in Palestine, with appropriate and modern equipment; the Safa Recycling Plant (treating 6 tons of cables/ day and separating plastic), near Idhna, and the recently created private company Ecotech Recycling (based in Bethlehem Industrial Zone), which focuses not only on e-waste from EEE but also on paper/cardboard recycling.

The main challenges facing the e-waste facilities are:

- The high operational costs;
- The insufficient and inappropriate infrastructure;
- The lack of governmental support; and
- The limited technical capacity.

On the one hand, there is evidence that the improper treatment of this waste has a negative impact on the environment and the public health of both the workers exposed and the population living nearby. Different types of e-waste bring different degrees of damage. For example, the treatment of electric cables, that does not have an intrinsic hazardous character (except for cables containing heavy metals), has a primary damage on human health (due to the dioxins released during the uncontrolled combustion of the coating rubber) and a secondary damage on the environment.

Commonly, workers do not wear PPE and have poor working practices, increasing their vulnerability in the long term. Several studies carried out in Hebron Governorate where e-waste is treated, confirmed the negative health consequences on the local population. As to the Palestinian cancer registry data from 1998 to 2007, there is a strong incidence of cancers in the villages of south Palestine and a strong correlation between children lymphoma and e-waste dismantling activities.

Considering that the sector brings a non-negligible financial resource to local residents, there is an urgent need to adopt flexible methods to ensure, as much as possible, the separation between the hazardous and non-hazardous components and to apply modern and safe treatment processes. Another issue is the gap of knowledge about the source, the amount, the processing and end points, which makes the tracking and the quality/ quantity/ type monitoring of this type of waste difficult to achieve.

4.5 Status of Gender-Based Violence in WB&G[3]

Gender Based Violence (GBV) is a key protection concern in Palestine. According to Palestinian Central Bureau of Statistics (PCBS) 2011, Violence Survey, an average of 37% of women are victims of GBV in Palestine. In the Gaza Strip, this percentage increases up to 51%. This percentage has declined by some 8%, referring to a similar survey conducted in 2019, **Figure 4**.

[3] Reference to Environmental and Social Management Framework (ESMF) January 2021

Women in Palestine face multiple layers of violence and discrimination. The analysis made in the UN Special Rapporteur's report on violence against women in 2005 found two main reasons for the GBV level in Palestine:

- Traditional patriarchal norms and values; and
- Occupation and its consequences.

The protracted humanitarian crisis, and its impact on gender and family dynamics, has exacerbated GBV in all its forms, including sexual violence, intimate partner violence and child marriage. Distance, mobility restrictions, fragmentation of areas and services and reluctance to report GBV due to fear of stigma, social exclusion, so-called honor killings or reprisal limits survivors' access to and utilization of critical services. Available services and capacity of service providers also remain limited, and survivors and communities have minimal information on existing services and how to access them. Only 0.7% of GBV survivors seek help due to the lack of confidential and compassionate services and fear of stigma and reprisal.

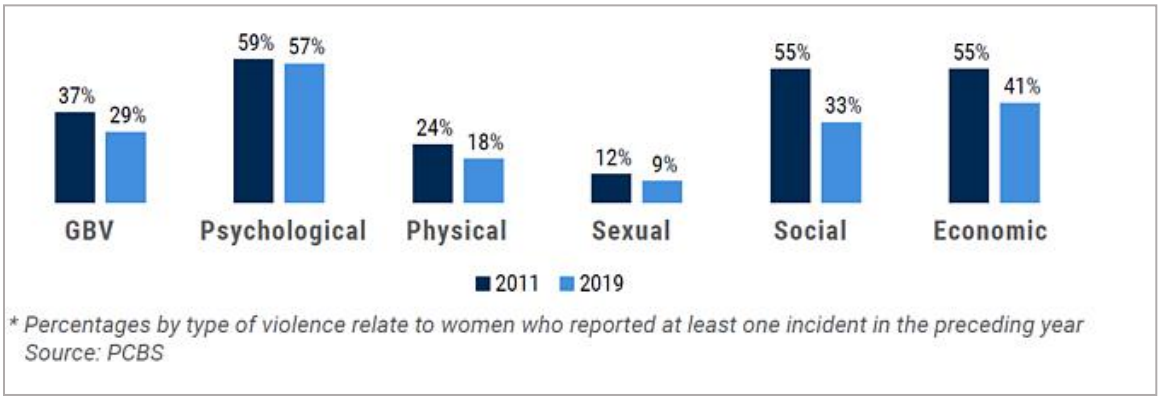

Figure 4: Domestic Violence against Women in Palestine (2011 vs. 2019)

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5. Environmental and Social Assessment and Mitigation

The environmental and social risk classification for the Digital WB&G Project is Moderate under the World Bank's Environmental and Social Framework (ESF), given that project activities will involve small-scale works during the expansion of IT hardware, retrofitting of buildings to accommodate the IT equipment (computers, servers, cables, etc.) for the Emergency Response Center, data center upgrade the e-government services and platforms, and installation of equipment and minor refurbishment to establish one-stop-shops. The Project will not result in any medium or large-scale works.

The anticipated potential environmental impacts may include: (i) generation of solid waste from retrofitting and installation of equipment and from the end of life of equipment; (ii) management and disposal of e-waste as a result of the replacement of old equipment and from the end of life of equipment; (iii) nuisance related to vibration and noise during installation activities; iv) risk of fire safety in buildings hosting equipment and one-stop-shops; and (v)) OHS risks during installation activities during internet connections for facilities and businesses and supply of broadband infrastructure such as, but not limited to: falls from heights, electric shocks and failure to use proper protective equipment during the installation of hardware and equipment. The impacts are expected to be site specific, short-term and reversible. The exact scale of the works will be determined during preparation, and the risk rating may be updated proportionately with the level of risk if deemed necessary as preparation of subprojects advances.

The Social risk of the project is expected to be moderate considering the following risks and impacts: risks related to social exclusion in its various forms that would need to be mitigated through ensuring that project benefits can be accessed and optimized for the most vulnerable, including those living in poor and remote communities; (b) risk of the exclusion of women such as access to broadband services, internet connectivity, e-services and job opportunities exist, (c) risk of exposure of workers and vulnerable communities to sexual harassment or exploitation; and (d) risks related to labor and working conditions for project contracted workers or the PMU employees (e) risks associated with data security and privacy from the restructuring activities of supporting the expansion of the Data Center, this includes the TA for cloud readiness, data usage, and retention . The project will not result in any risks related to involuntary resettlement. A Gender-Based Violence (GBV)/ Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) screening was conducted, and the risk is considered moderate. These impacts in addition to possible interruption of services during project implementation and installation activities, could become a source of grievance. Currently there is no risk related to involuntary resettlement or land acquisition, given that there is no civil works under the project only some minor rehabilitation of the existing networks and retrofitting of buildings to accommodate the IT equipment (computers, servers, cables, etc.) including the e-government services and platforms.

5.1. Environmental and Social Impacts and Risks Identification

The identification and assessment of environmental and social risks and impacts are considered key issues as these will be the basis for proposing mitigation measures necessary to anticipate, minimize, reduce and/or compensate for the negative impacts that the project may cause to the environment

and the society. This chapter presents the main impacts that have been identified, considering the characteristics and conditions of the physical environment and socioeconomic areas of influence.

The main characteristics of the project are as follows:

- The project's activities in the main two components (2 and 3) will directly support the development of the broadband infrastructure and services and will help improve the resilience and Emergency response of the Palestinian Authority.
- The outcomes of the project will directly impact the usage of digital services through improved quality of service, coverage, affordability and competition in the market, and help bridge the digital divide and promote a more inclusive growth across the country and between people of the WB&G.
- Digital transformation will provide WB&G with new possibilities to connect people and businesses and to provide services in contexts where traditional methods cannot, even in the current regional context.
- Digital tools will enable the Palestinian Government and people to coordinate healthcare responses, ensure a minimum level of business continuity, and provide a channel for safe social interaction.
- Interoperable digital public platforms will facilitate data exchange, data access and allow automatic verification, which can reduce administrative burden, errors, corruption and fraud risk, and lower costs of service delivery.
- Digital public platforms will increase access to data and services even in remote areas, promoting social and economic inclusion, entrepreneurship and prosperity.
- The implementation of an e-GP system for public procurement is a vehicle to enhance service delivery, transparency, and citizen satisfaction.
- The implementation of an end-to-end e-GP system will improve the efficiency and effectiveness of public procurement and increase competitiveness by enabling participation of small and medium sized enterprises in public tenders.

Table (4) summarizes the potential environmental and social impacts of the Project.

Table 4: Environmental and Social Impacts Assessment by Component and Recommended Action

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
Component 1: Enabling Legal and Regulatory Environment for Digital Economy.	Sub-component 1.1: Institutional Development	• Establishment and operation of TRA; • Establishment of CA; • Purchase of Equipment, hardware and software solutions. • Selecting a suitable crowdsourcing solution and advanced platform for monitoring service quality. This may involve evaluating and choosing the appropriate software or tools that can collect data from mobile and fixed telecom networks. • Implementing the chosen crowdsourcing solution, which may include configuring the platform to collect data from various sources, such as mobile apps, user reports, or automated network probes. • Actively collecting data on service quality parameters, which could include metrics like network speed, call quality, data latency, and other relevant performance indicators. • Analyzing the collected data to assess the performance of licensed telecom operators. This	This subcomponent will generate minor negative environmental impacts.	This subcomponent represents low risks. Key issues include data privacy measures under the crowdsourcing solution, and the monitoring of service quality parameters to ensure the privacy of individual's data collected, if any.	Implement the SEP

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
		involves identifying trends, patterns, and potential issues related to service quality. • Comparing the performance data with the license obligations of telecom operators to determine compliance • Selecting and implementing suitable crowdsourcing solution and advanced platform for monitoring service quality • Data collection, analyzing and comparing on service quality parameters			
	Sub-component 1.2: Development of Legal and Regulatory Frameworks and Cybersecurity and Data Protection.	• Review and updating of national strategies, existing regulations and data-related strategies; including the telecommunications and e-transactions Laws; • Development of legal and regulatory framework for the operation of TRA and CA; • Create complaints bylaw to the e-transactions law of 2017; • Cybersecurity and resilience of the cyber-physical systems.	This subcomponent will not generate impacts	This subcomponent represents low risks	Implement the SEP
	Sub-component 1.3: Capacity Building	• Provide capacity-building opportunities for sector employees; as training, workshops, etc.	This subcomponent will not generate impacts.	This subcomponent represents low risks. Key social issues include social exclusion	Implement the SEP.

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
				patterns and unfair utilization or access to project benefits. in addition to imbalanced representation of women in training activities.	
Component 2: Digital Infrastructure Solutions for Emergency Response, Recovery and Resilience	Sub-component 2.1: Emergency Response Center (ERC) for Resilience.	• Preparation of an Emergency Management Framework and Action Plan; • Development of laws and regulations for personal data protection standards and data exchange protocols; • Development of safeguards for the exclusive use of the ERC's systems in response to emergencies; • TA for procurement activities; • Capacity building activities for appropriate authority to respond to disasters.	This subcomponent will generate moderate environmental impacts. Waste generation in particular, e-waste from the procurement and installation of communication equipment and software. The activities will entail OHS risks including risk to Communicable diseases, noise, etc.	This subcomponent represents moderate risks/ social exclusion patterns and unfair utilization or access to project benefits.	Implement the SEP. Implement the project's OHS plan and EWMP Implement LMP
	Sub-component 2.2: Expanding Access to Broadband Connectivity	• Purchase of broadband services in collaboration with telecom operators and ISPs.	This subcomponent will generate moderate negative environmental impacts. Waste generation, in	This subcomponent represents moderate risks. Temporarily disrupt businesses, and other targeted	Implement the SEP. Implement the project's OHS plan and EWMP.

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
	through MFD approach.		particular, e-waste from broadband connectivity. Moderate negative environmental impacts are anticipated from equipping the targeted beneficiaries and institutions (OHS impacts including risk to Communicable diseases, noise, etc.).	facilities during the supply of broadband infrastructure. Social exclusion for the access to broadband services, e-services and internet connectivity. Risks related to labor and working conditions.	Implement LMP
		•			
Component 3: Fostering User Centered E-Service Delivery	Sub-component 3.1: Enabling environment for accelerated development of e-services.	• E-Government strategy and need to develop an action plan for digitalization of government. • Assess the technical and financial needs to deliver e-G services. • Market analysis of available e-G-platforms. • Service inventory and prioritization exercise.	This subcomponent will not generate impacts.	This subcomponent represents low risks/	Implement capacity building related activities.
	Sub-component 3.2: Delivering user-centric e-Services	• Purchase of equipment, software and licenses. • Expansion of the MTDE's forthcoming private cloud.	This subcomponent represents Low risks/ will generate low to moderate impacts. Some activities could include expansion of existing data centers,	This subcomponent represents moderate risks/ development priorities further exacerbate existing exclusion patterns.	Implement the SEP. Implement the project's OHS plan and EWMP Implement LMP

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
		• Business process re-engineering and its application to pilot services. • Support to piloting of a select number of transactional stage e-services. • Training, outreach and awareness campaigns to increase uptake of the Citizen Feedback Mechanisms tools. • TA to review the Government's cloud readiness enabling environment and strengthen data governance, this will include Governance Review, Policy Development and Training and Capacity Building • Investment in servers for the government cloud extension to support the planned increase in e-government services will include the following activities: Hardware Procurement: Acquire the necessary hardware infrastructure, including servers, storage devices, and network equipment, to support the	equipment installation and internal minor civil works in existing facilities. Waste generation in particular, e-waste The potential risks are (i) generation of solid waste from retrofitting and installation of equipment; (ii) management and disposal of e-waste as a result of the replacement of old equipment and from the end of life of equipment; (iii) nuisance related to vibration and noise during installation activities; and (iv) OHS risks during installation activities during internet connections for facilities and businesses and supply of broadband	Concerns with the restructuring activities include data privacy and security	E&S measures in procurement and contracting documents, including data privacy and security measures

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
		expansion of the Government Cloud. Data Center Upgrades: Ensure that the MTDE Data Center has the required infrastructure and capacity to accommodate the additional servers. Installation and Configuration: Set up and configure the newly acquired servers to seamlessly integrate with the existing infrastructure and support the planned increase in e-government services. • The transformation of selected post offices into one-stop-shop service will include the following activities:- Infrastructure Upgrade to ensure that the selected post offices are equipped with the necessary infrastructure to accommodate the expanded services. This might involve renovating the physical space, improving accessibility, and providing necessary technology and equipment. Training the post office staff to handle the new services effectively. Creating a central database or information	infrastructure such as, but not limited to: falls from heights, electric shocks and failure to use proper protective equipment during the installation of hardware and equipment During operation potential risk of fire safety in buildings hosting equipment and one-stop-shops		

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
		system that can be accessed by different government agencies. Procurement and installation of computer terminals, internet connectivity, document scanners, and electronic payment systems. Develop a customer engagement strategy to inform the public about the availability of these one-stop-shop services. This might include advertising, public awareness campaigns, and outreach programs			
	Sub-component 3.3: Development and implementation of priority e-government procurement (e-GP) functionalities	• Support PA in the development and implementation of e-GP functionalities. • Support tender preparation; • Establish interoperability with relevant G-systems; • Establish linkage with local commercial banks; • Software development and upgrading of existing hardware; • Capacity development and training of targeted agencies.	This subcomponent will not generate impacts.	Increase market access and competition/ Temporarily disrupt businesses, and other targeted facilities during software development and upgrading of existing hardware.	same as above
Component 4: Project Management and		• The creation of a dedicated PMIU in the MTDE and associated activities;	This subcomponent will not generate impacts.	This subcomponent represents moderate risks/ relatively weak	Implement the LMP and capacity building related activities that are in the ESCP.

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
Implementation Support		• Support project management issues; • Capacity building for the MTDE staff.		governance structure, and risks identified in the LMP	
Component 5: Contingent Emergency Response Component		• The crisis response expenditures could cover, for instance, the facilitation of emergency; payments to vulnerable groups of population using mobile money; ensuring of business continuity of core government functions, when civil servants are required to continue home-based work; or supporting of MSMEs, particularly the most affected ones, to address their immediate liquidity; challenges, reduce layoffs, and avoid bankruptcies.	The CERC is not expected to finance civil engineering works that can induce risks and/or negative environmental impacts.	The CERC is not expected to finance civil engineering works that can induce risks and/or negative social impacts	In case of activation of the CERC, the project ESMF will be updated as soon as the scope of the contingency component becomes better defined. In addition, a CERC Operations Manual will be prepared during project implementation to govern the operation of the CERC. The manual will be aligned with the ESMF at the time of preparation and will include provisions to ensure environmental and social due diligence in line with the requirements of the ESF.

5.1 Environmental and Social Impact Assessment

5.1.1 Selection of Valued Aspects

The aspects considered for this impact assessment are the ones that have been previously identified as activities that will generate environmental and social risks and impacts during the installation and implementation. During installation, these aspects are related to service delivery types of activities or purchase and supply of equipment, and do not include major installations and civil works. They include capacity building and e-service training programs, establishing systems that ensures the application of quality standards and quality assurance in public and private providers in ICT. During implementation, these aspects are not expected to generate significant negative environmental or social impacts.

The phases identified for the project are:

- ***Installation***
    - Purchase and supply of equipment;
    - Mobilization/ transport of equipment;
    - Installation activities and use of equipment;
    - Replacements of ICT equipment, computers, etc.
    - Broadband and governmental services and platforms;
    - Capacity building and e-service training programs;
- Waste generation; especially e-waste. ***Operation***
    - Uses of Project infrastructure and equipment;
    - Maintenance of project equipment and infrastructures;
    - Life and fire safety ;
    - Waste generation including municipal, and special waste (including e-waste);
    - Socio-economic implications.

Based on the project specifics, the key environmental and social aspects that have been considered for the impact assessment are the following:

- ***Physical Environment***
    - Poor management, piling up and improper disposal of e-waste; causing health and environmental impacts, as well as an unpleasant visual impact.
    - Effects on air quality by increased noise levels and traffic during installation and supply activities;
- Temporarily disrupt businesses, and other targeted facilities during installation activities; ***Social and Economic Environment***
    - Changes in quality of life;
    - Social exclusion of vulnerable groups;

- Effect on Occupational health and safety;
- Exposure to GBV/SEA/SH.
- Labor and working conditions
- Data privacy and security

5.1.2 Mitigation measures

These are specifications recommended to address the potential impacts of projects; to reduce, avoid mitigate and or compensate the negative social and environmental impacts identified in the impact assessment of the project's proposed activities. These are summarized and ranked in **Table 5**.

As a result of the analysis, it is evident that the most imminent potential impacts are associated with occupational health and safety, and solid and e-waste management.

Table 5: Analysis of the Digital WB&G Project Impacts and Risks

Project Phase	Impact Category	Level of Impact (+)	Level of Impact (-)
Implementation/ Installations	Increased expectation for new jobs	High	
	Effect on everyday life	Medium	
	Changes in traffic patterns		Low
	Increased of occurrence of labor accidents		Medium
	Increased request for services and equipment	Medium	
	Increased economic activities and practices	Medium	
	Effect on air quality		Very Low
	Soil contamination		Very Low
	Improper Waste Management		Medium
Operation	Increased expectation for new jobs	Medium	
	Effect on everyday life	High	
	Increased request for services and equipment	High	
	Increased economic activities and practices	High	

	Potential risk of fire and life safety related to improper connection of IT equipment which may result risk of electrical shock and fire		**low**
	Risks related to data privacy and public data misuse		**medium**

In any event, the application of good implementing activities and management practices is of paramount importance. Public consultation and Stakeholders Engagement are also necessary; as detailed in the SEP document related to this project. The affected persons should be informed of the potential problems and mitigation measures. Their concerns and suggestions should also be given due consideration. Wherever possible, employment should be considered for the local people. This will enhance cooperation and support for the project.

5.1.3 Mitigation Specifications

Most of the negative impacts associated with the sub-components for this project, are expected to occur during the installation phase. While these impacts are not expected to be major, the careful implementation of mitigation measures will allow for the reduction or avoidance of any adverse effects.

Table 6 indicates the list of all potential mitigation measures related to these activities. The measures are presented in a manner that makes them easy to be incorporated into an ESMP and, with appropriate adjustment, can become contract clauses for the contractor who will undertake the works. This also allows for ease of monitoring activities throughout the project cycle.

Table 6: Impact and Mitigation Measures

Impacts	**Specific Mitigation Measures**
Sourcing of equipment and materials	Equipment and materials shall be sourced from sustainable certified sellers.
Small-scale works during the expansion of IT hardware, retrofitting of buildings to accommodate the IT equipment for the ERC and the e-government services and platforms.	Installation sites are safeguarded with safety measures to keep the project and the workers on the site safe from trespassers, interruptions, and other inconveniences, and prevent passersby from accidentally entering the site and being hurt by equipment. Installation sites will properly be isolated and continued access to businesses, where these installations will take place, will be ensured by the MTDE
Noise (Vibration and noise nuisance)	• Installation activities will occur within specified daylight hours. • Community/ public to be informed in advance of any work activities to occur outside of normal working hours or on weekends. •
Wastes	• Contractors to develop and implement waste management plan in consultation with the local authorities. • Contractors to abide by all pertinent waste management and public health laws. • Waste collection and disposal pathways and sites will be identified for all major waste types expected from the installation activities. • Waste will be stored in appropriate bins. • All waste will be collected and disposed of properly in approved landfills. • Whenever feasible, the contractor will reuse and recycle appropriate and viable materials (except hazardous materials).

E-waste	• An e-Waste Management Plan (EWMP) shall be developed to describe the waste management related issues within the e-waste and specify the best way to address these issues, giving specific actions, targets and timeframes. The aspects related to the generation and management of all types of waste must be considered from the very beginning, during the pre-design, contracting, installation, and operational phases. In all cases, provisions shall be taken to minimize waste production and to provide proper management to reduce the impacts that these may have on the environment. e-waste management procedures are presented in **Annex 11.8.**
Occupational Health and Safety (OHS)	Implement mitigation measures in LMP including but not limited to: • Contractor/supplier shall adhere to health and safety local regulations, WBG EHS guidelines and GIIP (Good International and Industry Practices) • Contractors/suppliers are required to develop proper emergency responses in advance, which shall be coordinated and approved by the MTDE and the PMIU, in a timely manner. • Commitment to the Ministry of Health and WHO guidelines regarding protection measures from Communicable diseases; Contractors must ensure that an OHS Plan is in place to guide work activities and provide PPE and maintain a safe environment for workers. • Contractors must ensure that all workers have received regular training to perform their job, as well as daily inductions prior to work activities have taken place. • Contractors must ensure that all workers operate within a safe environment. All relevant Labor and Occupational Health and Safety regulations must be adhered to, to ensure worker safety. • Workers must be provided with the necessary equipment as well as protective gear as per their specific tasks such as overalls, gloves, goggles, boots, etc. • Contractors must ensure that there are basic medical facilities on site and that there are staff trained in basic first aid. • Appropriate posting of information within the site must be done to inform workers of key rules and regulations to follow.

Labor and Working Conditions	• The MTDE will implement LMP (separate document) for mitigating the labor and working conditions. • The EHS officer at the MTDE-PMIU will review to ensure that terms and conditions of all project's workers are in accordance with the requirements of national law and ESS2 as indicated in the LMP. • The project's workers will be able to lodge their complaints, concerns, difficulties to the Workers'/project's GRM. • Develop and include GBV (SEA / SH) redress and referral mechanisms in the Workers' GM.
Interruption of services during installation activities	• The contractor/supplier shall notify receptors at least one week in advance of the schedule and duration of installation activities. • The contractor/supplier shall coordinate with service providers to ensure continued access during installation. • Speed up repair of any service interruption.
Social exclusion of vulnerable groups	Implement the SEP including: • Setting criteria for selection of beneficiaries; • Ensuring that project benefits, such as access to broadband services, internet connectivity, and job opportunities, can be accessed and optimized for the most vulnerable groups such as youth and women, including those from poor communities; • Ensure access to information and transparency in decisions; • Undertake public consultation and information dissemination; • Establish and create awareness on grievance redress mechanism.
Exposure to GBV and SEA/SH	• Include specific procedures for GBV within the project's level GM, such as confidential reporting and ethical documentation of GBV cases as described in the SEP. in additional to effective uptake channels and adequate referral mechanisms that are survivor centric. Adopt and implement the Code of Conduct throughout project implementation (Annex 11.9). Conduct E&S awareness to project workers, including on the GM and CoC.

Inadequate consultations with relevant stakeholders	• Initiate consultations processes with relevant stakeholders during the preparation and finalization of the project's activities as described in chapter 7 and the SEP. • Insure operational GRM for the public (project GRM) to raise any concerns regarding project activities within a set time period. • Apply the Stakeholder Engagement Mechanisms, covered in the SEP document.
Life and fire safety	• Implement occupational health and safety guidelines according to national requirements
Data Privacy and Security	• Ensure adequate data safety and security measures in the data center. • Provide capacity building to staff on data security and data handling. • Include adequate measures in contracting documents with consultants, direct, and contracted workers.

6. Environmental and Social Management Plan (ESMP)

This section is prepared as a guideline for the preparation of site-specific Environmental and Social Management Plans (ESMP) for subprojects activities that are still pending for a final design and site assignment. Usually, the ESMF is used to guide the development of specific ESMPs, in view that general activities and impacts for the project concept design have been identified, but that specific details on the activities for the implementation of the subproject are not known. As such, a framework to provide guidelines for a generic ESMP for the project has been included below. The number, scope, and type of plans, procedures, programs, to be included in each ESMP is not limited, and it should be developed according to the project needs. It is also expected that in the case of environmental and social risks or impacts that have not been identified or included in this ESMF, a plan can and should be prepared using the recommended formats.

6.1 Environmental and Social Management Plans: Guidelines for Subprojects

An Environmental and Social Management Plan (ESMP) is an i instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental and social impacts, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures (see ESS1 annex 1). The ESMP includes environmental and social impact mitigation and control measures, as well as its projected cost, the timing and length for those measures to be implemented, and the responsible parties. The responsibility to prepare the ESMPs relies on the EHS officer at the PMIU who will supervise the work of the independent consultant, preparing the ESMP.

6.1.1 Subprojects Identification Procedures

In order to determine the extent of the environmental and social management plans for each subproject, an identification procedure will be performed using a specially designed or screening form (Annex 11.2 and further detailed in Chapter 8) to assess the scope of the E&S risks and impacts. The form is used to determine what type of E&S instrument will be needed for each case. The identification process for subprojects' ESMP will also ensure that its implementation activities that could generate a potential negative impact will not be non-compliant with the Environmental and Social Standards of the WBG. These are:

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

6.1.2 Risks, Strategies and Mitigation Opportunities for Subprojects

In section 5 of this Environmental and Social Management Framework (ESMF), the generic potential environmental and social impacts and risks for the project activities have been identified. Also, the project implementation will be carried out by different agencies and contractors/suppliers with different skill levels, as well as the moment of the specific activities and their location have not been defined yet.

In order to ensure good practices and attention to those identified risks and impacts, and in accordance with the mitigating measures recommended, a list of strategies is presented for the subprojects' ESMPs preparation. These will be included in the bidding documents of the future contractors/suppliers to be hired; this will ensure that a specific ESMP for each subproject action will be prepared and fully implemented. Table 7 presents the risks, strategies and mitigation for subprojects' activities of the Digital WG&G project.

Table 7. Risks, and Mitigation Opportunities

Media	Risk and Impacts	Mitigation opportunities
Environ/ Natural	Risks of a reduction of air quality (increased particulate matters and gas emissions, radiation, etc.)	Include adequate insolation and other procedures to ensure emission controls from sources point
	Affectation by increase in vehicular traffic, where applicable	A procedure will be prepared to control and organize traffic in and around the project premises during the temporary installation of equipment and operations, this will also include accident prevention (routing and signaling)
	Labor and working accidents	An Occupational Health and Safety plan would be prepared as part of the ESMP.
	Lack of signaling and warnings sings	A signaling protocol will be prepared for all subproject implementation locations. This protocol will include prevent and danger notifications to ensure secure access to individuals.
	Dust and Noise generation	Use of face masks and filters for workers in dusty areas For noise control, adjust working schedule to those hours allowed by local legislation. Workers in noise work areas, must use muffled earwear to reduce potential health issues.
	Solid waste without treatment	For this purpose, a solid waste management plan will be prepared.
	inadequate uses of installation materials, such as lead paints, and asbestos	All materials used for the project will be from authorized sources, quarries, wood storehouses, etc. Prevent and avoid uses of toxic materials in the project.
	Inadequate segregation and temporary storage of toxic and dangerous materials, including e-waste during installation and operational phases	Prepare and implement a Toxic and Dangerous material Management Plan that includes e-waste. This plan must include monitoring and registry.

	Improvement of working conditions to ensure better environmental Practices	Implement LMP
	Risks of electrical current tension/voltage alteration that could cause fire hazards.	Implement tension and voltage stabilizing equipment to prevent alteration on the electrical installations.
	Risk related to Communicable diseases	Alternating team when there is a communicable disease, Follow MoH procedures and instructions
Social	Risk to create access barriers to handicapped	Assurance to include the appropriate measures to avoid this issue
	Improve the access standards to ensure vulnerable groups	Include measures that improve access in this project and others in the future by vulnerable groups.
	Risks of burglary and destruction	Include adequate security process to ensure the project equipment and installations. Include proper labelling
	Risks of not sufficient trained personnel	Initially reinforcement with international expertise. Initiate training processes for local individuals

6.2 Guidelines for the Preparation of the Environmental and Social Management Plans (ESMP)

These site specific ESMPs will be prepared based on the technical norms and local legislations that are pertinent to the project design and implementing process during the installation/supply, implementation and closing phases. Samples for the content of ESMP and generic ESMP are presented in Annex 11.5 and table 12, respectively.

7. Environmental and Social Screening Procedures

7.1 Screening, Review, and Approval of Sub-Projects

This section outlines the screening, review, and approval process for activities to be financed under the Digital WB&G Project, and in particular for Components 2 and 3. As the locations for the sub-projects are not clearly identified at this stage, it is important to have the appropriate tools in place to assist in screening these activities for potential impacts and to provide guidelines for implementing measures to effectively address them.

In addition, the following approach is provided to the screening and appraisal process for sub-projects; under the Digital WB&G Project. Once the sub-projects have been identified and locations selected, this section is to be used for screening sub-projects and implementing the appropriate measures while ensuring adherence to all respective legislative requirements for screening and EA.

The first step of the screening procedure will be the preparation/provision of a screening form designed to capture the necessary information about potential environmental and social impacts associated with the proposed activities. The screening form will have to be completed by the Proponent of the sub-project and submitted to the PMIU for review. The subproject Screening Procedures have been included in **Annex (11.2)**.

The screening template available in Annex 11.2 has been prepared by the PMU following the project's initiation and experience in assessing and screening proposed activities, in 2023 it has been shared with the World Bank. The template has been reviewed and cleared and has been used for screening project activities.

The forms cover all the ESSs of the World Bank and identify which of these are applicable to the project's activities. If the screening process reveals that the subproject required preparation of ESMP, the ESO will prepare the site-specific ESMP making use of the generic ESMP present in Annex 11.5.

8. Institutional and Implementing Arrangement for the Environmental and Social Framework

Environmental and social monitoring will be an integral part of the PMIU supervisory work during the project implementation. The PMIU and the EHS officer and Project Coordinator, will be responsible to ensure that project contractors/suppliers are familiar with the EA instruments and on the compliance with the plan. The MTDE/ PMIU will conduct regular on-site monitoring of works to verify adherence to the requirements set out. **Figure 5** below depicts the main Digital WB&G Project Implementation responsibilities among the partners involved in the project.

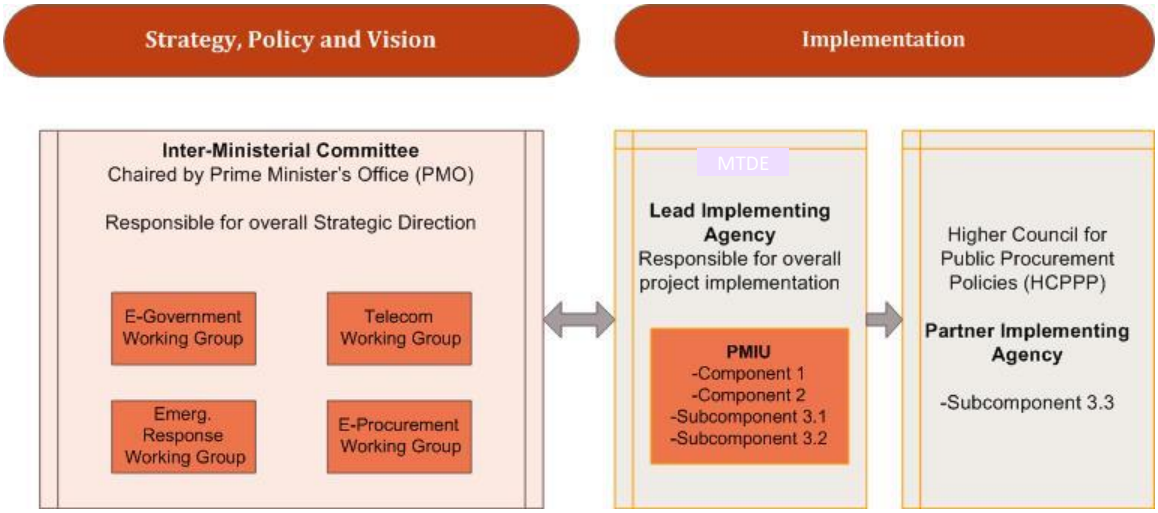

Figure 5: Digital WB&G Project main Implementation Responsibilities

The project ESMP is to be prepared to cover the project specific components that have moderate to low environmental and social risks. The ESMP shall be included in the bidding document, so that potential contractors/suppliers are aware of environmental and social performance standards expected from them and are able to reflect these in their bids and work.

The ESMP becomes an essential part of a work's contract upon its conclusion and its implementation is mandatory. During installation, the ESMP is the responsibility of PMIU. The owner of the project, the MTDE, is to manage the ESMP and its defined mitigation measures during the operation of the project.

9. Stakeholder Engagement, Information Disclosure, and the Grievance Mechanism

9.1 Stakeholder Engagement

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, once they are initiated. The same applies to relevant stakeholders.

To fulfill the requirements of ESS10, the MTDE has prepared a Stakeholder Engagement Plan (SEP), which has been updated for the restructuring in July 2024. 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 the MTDE in the implementation of stakeholder engagement activities. The updated SEP supports clear communication and meaningful consultation, ensuring proportionate measures relevant to the project's activities, and considering the needs of various stakeholders while also following the World Bank Group technical note on "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings". The updated SEP identified the stakeholder categories and affected parties in relation to activities related to the project.

During the project preparation in 2020, various meetings were held with the identified stakeholders, the MTDE and project team engaged with key stakeholders to prepare for the Digital WB&G project. Initial meetings in August and October involved discussions with representatives from public safety, telecommunications, and energy sectors about components like the Emergency Response Center and telecommunication laws. A major public consultation in December brought together representatives from civil society, the private sector, and various ministries, focusing on concerns like system upgrades, information security, and the prioritization of e-payment solutions. These discussions emphasized the need for fair access to services and minimal disruptions during digital upgrades, shaping the project's strategic direction. Further details of previous stakeholder engagement activities are available in the Updated SEP which is disclosed on the DWBG project webpage on the MTDE website: https://mtde.gov.ps/home/Digital_Services_Development_Project?culture=ar-SA#%D8%A7%D9%84%D8%A7%D8%B5%D8%AF%D8%A7%D8%B1%D8%A7%D8%AA.

Moreover, during the project's implementation from December 2021 to mid-2023, various stakeholder engagement activities were conducted. Several engagements and meetings took place with key stakeholders such as ministries, the banking sector, ISPs, and private companies, addressing system upgrades and readiness for digital transformation. Engagements also included topic-specific discussions on e-waste management, occupational health and safety, and the setup of an Emergency Response Center (ERC), expanding to involve NGOs, CBOs, municipalities, and universities. Additionally, specific sessions focused on outreach to vulnerable and marginalized groups and collaboration with entities like SAWA to establish referral mechanisms for gender-based violence and link services with the project's

upcoming 911 system. During the period of June 2023 – June 2024, the project engaged stakeholders in a workshop to discuss the final draft of the eGovernment strategy document, and another important engagement activities were conducted related to Certificate Authority and e-transaction law

For the restructuring activities and the updated ESMF, a virtual public meeting was conducted on the 24th of July 2024 at 11:00 am via MS Teams. The invitee list contained 156 invitees from different ministries such as HCPPP, MoWA, and MoI, in addition to NGOs, INGOs, and CSOs such as Maan Development Center, Engineers' Association, UNRWA, and Save the Children, Private-sector and banking sector representatives such as Ooredoo, Jawwal, Paltel, Mada, Bnet, Massader, Al Quds bank, Bank of Palestine, and Al Ahli Bank, also universities such as Annjah National University and Birzeit University, and municipalities such as Salfeet, Birzeit, Al bireh and Bethlehem among others. The attendees included 39 people representing the above stakeholder segments. The consultation session aimed to introduce the updated SEP and ESMF as well as the restructured DWBG project activities. It provided an overview of the project, its activities, development objective, and the updates proposed under the restructuring. The consultation session discussed the relevant national legislations and the World Bank's ESF and relevant ESSs, in addition to the E&S risks, mitigation measures, and E&S management plans and tools that apply to the DWBG and its restructuring. Disclosure mechanisms, the MTDE website, digital platforms and links such as the online forms and disclosed documents have also been discussed. The consultation session provided an overview of the updated ESMF, the identified E&S risks and the proposed mitigation measures. Additionally, the project's GM has been discussed including workers' GM, anonymous grievances, and GBV referral mechanisms, the attendees were also informed of the different uptake mechanisms for the project GM and the World Bank GRS.

Feedback received during consultation session included clarifications and discussions on the project implementation timeline, moreover stakeholders asked questions regarding the GBV referral mechanism and the arrangements with the MoWA, and the inclusion of MoSD in the referral process, in addition to the different steps and timeframe for resolution of received grievances, their processing, and registration. Stakeholders representing public media discussed their role in outreach especially to vulnerable and marginalized groups, to disclose project benefits and create awareness on digital transformation and the project's objectives, further discussion from attendees included the role of the banking sector and cooperation with the government agencies on unifying the solutions implemented such as digital payment solutions. The project team also discussed the information disclosure processes and documents including the PAD and the E&S tools that are available on the MTDE website. The stakeholders' feedback and remarks were recorded by the PMU director, where it has been discussed that further engagement activities will include focus and topic-specific engagements with stakeholders such as the private sector, banking sector, and media to enhance cooperation, the MTDE Gender unit has been involved in the project's restructuring and the available referral mechanisms will be strengthened through a gender capacity building activity under subcomponent 1.3 that aims to enhance the PA and MTDE capacity. Moreover, the DWBG project will also enhance its disclosure mechanisms through the continuous implementation of the SEP and information disclosure through its available channels. The updated ESMF and SEP have been shared with the invitees following the consultation

session for their review and to provide further feedback if any, further details of the consultation session and feedback are available in the updated SEP.

9.2. Information Disclosure

MTDE has established a project page on its website: (https://mtde.gov.ps/). The project page includes an introduction on the project in both English and Arabic, contains disclosure documents and project E&S instruments (e.g., ESMF, SEP, GM Brochure, and others) to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. Additionally, the project page contains an online GM uptake channel with a description of the GM in both English and Arabic. The project page can be accessed through: https://mtit.pna.ps/home/Digital_Services_Development_Project?culture=ar-SA#%D9%85%D9%82%D8%AF%D9%85%D8%A9

9.3. Grievance Mechanism

The project activities may have some short term and reversible impacts. In order to ensure the implementation of the Project in a timely manner and effectively address any anticipated and unanticipated risks that would be encountered during implementation, including the development of the necessary actions of mitigation and avoidance, the existing complain and Quality Control Unit (CQCU) will be upgraded to accommodate the project GM system. Currently, the existing CQCU at the MTDE is dealing with the complaints and grievances that are received at the ministry and making sure that these complaints are resolved. The CQCU is reporting directly to the office of the Minister. The unit has about 10 employees. The grievances relating to implementation and operation activities of the Digital WB&G Project shall be managed by the ESO who will be responsible for the implementation of the GRM measures and procedures. The contractor/supplier and operator will be responsible for providing grievance mechanisms for their workers. Procedures for handling, resolving and documenting grievances are detailed in the updated SEP, including a list of mechanisms for lodging complaints such as telephone number and email address. The CQCU controls the quality of the services provided by the three main directorates within the MTDE, the Information Technology (IT), the telecommunications and Post. Most of the complaints are against the ISPs and telecommunication companies. Complaints between these and complaints from the public against these.

The DWBG has an existing effective and accessible GM, both for public and project workers. The GM has been disclosed on the Project page, media outlets, and has been engaged and consulted on with stakeholders throughout the project's implementation.
The existing GM will be maintained and will be utilized for the restructuring activities as well. The GM contains GBV (SEA / SH) referral mechanism that has been established in liaison with the Gender Unit at MDTE and in cooperation with the Ministry of Women Affairs (MoWA) who have been consulted with, engaged, and involved during the GM development.

GM implementation structure, uptake channels, processing and sorting mechanisms, follow-up procedures, registry, feedback, training, and reporting are detailed in the existing DWBG manual which is available through: https://drive.google.com/file/d/14M4e5LXQyPEEvfoOHFYi6l2VtLlKAlwq/view?usp=sharing

Additionally, the DWBG prepared a simplified summary in Arabic language for the project's stakeholders including vulnerable and marginalized groups, which has been disseminated at activities' locations through posters and pamphlets, the simplified Arabic GM can be accessed through: https://mtit.pna.ps//uploads/files/20230412014538_GRM_Brochure.pdf

The GM will provide appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

The DWBG in addition to the above has an effective and accessible workers' GM. The Workers' GM has been publicized to all project workers, and an E&S training including workers' GM has been provided in 2023. Contracted workers are also provided with a workers' GM through their employers, as the workers' GM is included in the bidding documents as a requirement. The DWBG workers' GM manual is available through:
https://drive.google.com/file/d/1HrI8MrHBngQk-ow6ABkUXL0ZOexU44yn/view?usp=drive_link

9.4. World Bank Grievance Redress Service (GRS)

The complainant has the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. The GRS should ideally only be accessed once the project's grievance mechanism has first been utilized without an acceptable resolution. World Bank Procedures requires the complainant to express their grievances in writing to World Bank office in Washington DC, by completing the bank's GRS complaint form which can be found at the following link: http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redressservice#. Completed forms will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: grievances@worldbank.org
Fax: +1-202-614-7313
By letter: The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018 NW,
Washington, DC 20433, USA

10. Environmental and Social Monitoring and Capacity Building

10.2. Environmental and Social Monitoring Guidance

A system for environmental and social monitoring and reporting will be developed by the EHS officer. These specifics are part of the institutional arrangements decided between the MTDE, the PMIU, the project proponents, and the local EQA officials. However, these principles are to be incorporated in Digital WB&G Project environmental and social monitoring and reporting, as follows:

- The EHS officer will conduct at least one site visit for each proposed project component, in order to "ground-truth" the environmental screening and classification form. A brief on this visit is to be written, with subproject visit date, participants, visit specifics covered, photos, names of beneficiaries interviewed, conclusions and recommendations, etc.

- Similarly, the EHS officer will conduct at least one site visit for each accepted project component, in order to give relevant advice on the expected design, structure, and content of the ESMP. A brief on this visit is to be written, with project visit date, participants, visit specifics covered, photos, names of beneficiaries interviewed, conclusions and recommendations, etc.

- PMIU Quarterly Progress Reports and interim reports on Environmental and Social training, EA, capacity building, and site visits reports should be shared with the World Bank upon request. The reports should include:

    - The date and place of the workshop;
    - The agenda of the workshop, i.e. what topics were covered;
    - The names and titles for each person in attendance. It is suggested that there be a "sign-in sheet" that can then be scanned and inserted directly into the report.
    - The names and titles of those who led the workshop;
    - Any observations about: what topics need to be covered next, any interesting topics/subjects that came up during the discussions; any good practices shared, which should be followed up on and incorporated into future workshops.
- The small scale works site monitoring form: 100% compliance is defined to be at least one completed form for each month that project is in its implementation phase;

- The EHS officer at PMIU and the local EQA official will conduct one joint site visit per month in order to jointly report on compliance with both local and World Bank environmental and social standards.

10.3. Monitoring, Evaluation, and Reporting Responsibilities

Monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts of the project and the effectiveness of mitigation measures. This allows the Project to evaluate the success of mitigation measures as part of project supervision and allows corrective action to be taken when needed. The EHSO will be responsible for monitoring the implementation of mitigation measures, set out in the

ESMP. Relevant practical indicators to enable effective monitoring will be identified by the EHSO such as number of mitigation measures implemented; functional GRM system is in place; complaints received have been completed for a reasonable period; using the results of E&S monitoring to guide subsequent implementation, stakeholders concerns during consultations on possible impacts of sub-project activities and taken into consideration during the preparation of ESMP, E&S monitoring reports are produced on time according to the ESCP and Project Operation Manual (POM), etc.. Monitoring is to be conducted on a continuous basis. The flow of monitoring proceeds is presented in **Table 8**:

Table 8: Digital WB&G Monitoring, Evaluation, and Reporting Framework

Type of M&E	Who	Description
Constant monitoring	Between PMIU/ EHS officer and project proponent site engineering staff	The PMIU's EHS officer and the project proponent staff responsible for standards compliance will be interacting on a day-to-day basis.
Monthly monitoring reports	EHS officer/PMIU	This report will necessarily address environmental and social issues relevant to the project (for specific subproject), and specifically focus on those issues relevant to the ESSs.
Monthly monitoring reports	EHS officer/PMIU	The PMIU will submit monthly monitoring reports to the MTDE as part of a consolidation of PMIU reporting. The structure and content of these reports, interim to the Quarterly Progress Reports, will be finalized between the PMIU and the MTDE.
Quarterly Progress Report (QPR)	PMIU to MTDE, From MTDE to World Bank	The PMIU will submit the report to the MTDE, and the MTDE is to proceed for a quality-check and formally submit this report to the World Bank upon request. Elements of contents of this report are presented in **Annex 11.3**.

10.4. Capacity Building and Good Practices

The successful approach to standards implemented under the Digital WB&G Project will be maintained. The employees at MTDE lack the required experience in environmental and social assessment and did not practice such exercises before. This has been assessed during the different meetings and during the preparation of the project. Therefore, project officers are to attend capacity building programs that will ensure having accumulated sound knowledge in the World Bank ESF, as well as supporting the project beneficiaries in their efforts to comply with these procedures. The MTDE will appoint a full time EHS officer to assist PMIU in monitoring environmental safeguards issues. Among the main activities of Component 4 of the project is the capacity building of the MTDE and PMIU.

The PMIU shall be responsible for monitoring and compliance with the environmental and social standards and requirements. It will have the responsibility of reviewing and assessing the EA and ESMP

of the project activities. The PMIU and the EHS officer shall receive environment and social specific training, covering among others:

- Environmental and social screening;
- Preparation of ESMPs;
- Implementation of ESMPs for the installation and operational phases;
- Occupational Health and Safety;
- Environmental and social monitoring and reporting.

The capacity building and training shall also invite officers of the MTDE, interested private sector parties, and other stakeholders; an interesting subject for the stakeholders would be environmental monitoring and reporting.

Capacity building good practices and coordination between the PMIU and EQA go hand-in-hand. The best learning is in the field and during implementation course. To this end, it has been suggested that:

All Quarterly Progress Reports (QPRs) and PMIU interim reports (on EA trainings, capacity building, and site visits, etc.) should be shared with the MTDE and EQA. Sharing these reports will allow to know how PMIU is documenting its work; there is no expectation that formal comments will be sent or received on these reports.

10.5. Capacity building requirements for Implementation of ESF

Even though the MTDE has great technical capacity, it has limited capacity on World Bank ESF experience. Therefore, there is a need to provide necessary capacity building to ensure that the ESF instruments prepared for the project (ESMF, LMP and SEP) are effectively implemented. The EHS officer and other PMIU staff shall be exposed to formal training in the management of environmental and social issues. The training program will include an orientation program on ESF, ESMF, LMP, SEP, environmental assessment processes, M&E and OHS. Capacity building will also help improve the effectiveness of stakeholders' engagement in management of environmental and social impacts during implementation and operation of the project.

Four officers have already been appointed by the MTDE to work in the PMIU: the unit head (manager), procurement expert, financial expert and IT engineer. The EHS officer, procurement assistant, evaluation and supervision officers are foreseen to be appointed after project effectiveness.

In addition to the recently hired staff in the PMIU, the key project partners including and HCPPP are to attend capacity building programs. During project implementation, the EHS Officer will provide training for the selected NGOs and project's workers.

Training will cover subjects on World Bank ESF; implementation of ESMF, SEP and LMP; World Bank environmental and social management procedures; consultation and monitoring during project implementation and reporting; handling inquiries, complaints and grievances related to the project; promoting awareness of GBV issues and prevention of these cases; World Bank environmental and social management procedures; consultation and monitoring during project implementation and reporting; and on OHS.

10.6. Budget and Resources

Table 9 below summarizes the estimated costs and schedules for the items associated with the implementation of the ESMF.

Table 9. ESMF Estimated Costs and Schedules

Item	**Schedule**	**Cost/annual**
Prepare subprojects' ESMP	The first year of project implementation	20,000 USD
Implement ESMF	Throughout project implementation	No additional cost
Recruit EHS officer	Full-time throughout project Implementation (within 2 months of the project effectiveness	5 years @ 36,000 USD per year USD180,000
Implement ESMPs	Throughout project implementation	No additional cost
e-Waste Management Plans (EWMPs)	Once project details become available during the design phase	USD 20,000
Total		USD 20,000

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11. Annexes

11.1. World Bank Environmental and Social Standards (ESSs)

1. ***ESS1: Assessment and Management of Environmental and Social Risks and Impacts***; It sets out the responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards.

2. ***ESS2: Labor and Working Conditions***; It recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. It is to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

3. ***ESS3: Resource Efficiency and Pollution Prevention and Management***; It recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable.

4. ***ESS4: Community Health and Safety***; It recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities.

5. ***ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement***; It recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term “involuntary resettlement” refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

6. ***ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources***; It recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. Biodiversity is defined as the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can therefore often adversely affect the delivery of ecosystem services.

7. ***ESS7: Indigenous Peoples***; This ESS applies to distinct social and cultural groups identified based on certain criteria defined in the ESF.

8. ***ESS8: Cultural Heritage***; It recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. People identify with cultural heritage as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions. Cultural heritage, in its many manifestations, is important as a source of valuable scientific and historical information, as an economic and social asset for development, and as an integral part of people's cultural identity and practice. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle.

9. ***ESS9: Financial Intermediaries***; It recognizes that strong domestic capital and financial markets and access to finance are important for economic development, growth and poverty reduction.

10. ***ESS10: Stakeholder Engagement and Information Disclosure***; It recognizes the importance of open and transparent engagement with the project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

11.2. Screening Form

Extended Environmental and Social Screening Form / Checklist

– Digital West Bank and Gaza (DWBG) Project-

- SECTION 1: ACTIVITY OUTLINE -

Component	
Sub-component	
Activity Name	
Beneficiary of Subproject	
Financed Activities by the Project	
Expected Start Date & Expected Duration of Project Implementation Phase	
Contact Person and Contact Details	

- SECTION 2: SCREENING PROCESS-

Objective of the Screening Process	

ESMF Risk Classification and Project Applicable ESSs per the ESMF	
Date and Day of Screening	
Description of Screened Site Location and Geocoordinates	
Coordinates of Site Location/s	"INSERT MAP IN ANNEX"

- SECTION 3: PROJECT & ACTIVITY DESCRIPTION –

Project Brief	
Activity Description	

- SECTION 4: SUBPROJECT ELEGIBILITY SCREENING -

Exclusion List				
Activities	Yes	No	I Don't Know	If yes, Elaborate
ESS1: Assessment and Management of Environmental and Social Risks and Impacts				
1- Do the activities to be financed or co-financed significantly adverse environmental impacts that are sensitive, diverse, or unprecedented. Is it possible that these impacts might affect an area broader than the sites or facilities of the subproject?				
2- Are any of the anticipated impacted substantial to high?				
ESS2: Labor Rights and Working Conditions				
3- Do the activities to be financed carry high occupational health and safety risks?				
4- Do the activities to be financed carry high risk of forced or child labor?				
ESS3: Resource Efficiency and Pollution Prevention and Management				
5- Do the activities to be financed pose risks of heavy exploitation of resources? Will it impact the community's use and share of these resources?				
6- Do the activities to be financed carry adverse impacts in terms of emissions? Do they carry adverse impacts on human and environmental health?				
7- Do the supported activities entail the purchase and application of banned chemicals or hazardous material?				
ESS4: Community Health and Safety				
8- Do the activities to be financed have potential adverse environmental or social impacts on human populations? Are any of these impacts irreversible, long-term, substantial or high risk?				
9- Will the supported activities carry any negative irreversible impacts on vulnerable groups?				
ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement				

10- Will the supported activities entail the use of financial payments or legal actions to support and/or implement temporary or permanent involuntary resettlement of local population, include private land acquisition or restriction on land use?				
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
11- Will the project impact natural habitats or areas of conservational value? (Critical habitats, wetlands, forests, grasslands, and others)				
ESS8: Cultural Heritage				
12- Is any of the sub-project's locations situated in areas of cultural or historical value?				
13- Will the financed activities carry any potential negative impacts to cultural values or heritage of local communities?				
ESS10: Stakeholder Engagement and Information Disclosure				
14- Are there any reasons preventing stakeholder engagement and information disclosure?				

Recommendations:

- If the answer to any of the questions above is yes, the subproject should be excluded from financing.
- Compare the Project Applicable ESSs to the Screened ones. highlight which ESSs have not been identified in the Project ESMF. The ESMF should be revised prior to proceeding with financed activities.
- If all the answers are no, proceed with the subproject Environmental and Social Screening below and list the appropriate E&S mitigation measures/ instruments

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
ESS1: Assessment and Management of Environmental and Social Risks and Impacts						
Is a full environmental and Social Impact Assessment required for the financed activities? Based on: - Its Risk Rating? (e.g., High, or substantial) - National Legislations (i.e., EIAP, PEL)				**ESMF**	**ON SUBPROJECT LEVEL**	
Are there any anticipated potential impacts and risks to the physical environment, including water resources, atmospheric emissions, noise, solid waste, or ecological degradation?						
Have there been any complaints raised by local affected population, groups, NGOs, or other parties in relation to the subproject area, or the facilities to be used? Will the financed activities remedy these complaints?				**ESMF** **SEP** **GRM**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Is there a risk of capturing project benefits by certain parties? Or diversion of financed activities benefits?				**SEP** **GRM**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
Is there a risk of lack of monitoring of financed activities due to remoteness of location?				**SEP** **GRM** **ESMF**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Is there a likelihood that the activities would have inequitable or discriminatory adverse impacts on affected populations? Or to exclude individuals or groups? Including vulnerable and marginalized groups?				**ESMF** **SEP GRM**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Does the subproject management have the institutional environmental and social capacity to manage and implement the E&S risks and mitigation measures?				**ESMF**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Is the subproject location owned by, licensed, or rented to MTDE?				**Subproject Licenses**	**ON SUBPROJECT LEVEL**	

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
Does the implementing agency or subcontractor have valid operating permits, licenses, approvals, etc.? If not, please explain. Permits to screen for include construction permits, operational/use permits, waste management permits, environmental permits, land permits, water management permits… If not, will financing be used to obtain the required permit(s)?				**ESMF**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Do the financed activities in any of their implementation phases pose significant fire risk due to material used, processes, operations or other factors?				**ESMF**		
Does the subproject facilities have appropriate mitigation measures for fire risks? (based on national civil defense instructions, including but not limited to fire extinguishers, alarms, fire exit and signs)				**National Civil Defense Regulations**		
ESS2: Labor Rights and Working Conditions						
Does the subproject employ its workers in accordance with the national labor laws?				**LMP**	**ON PROJECT LEVEL**	

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
					ON SUBPROJECT/CONTRACTOR LEVEL	
Does the subproject have an effective and responsive Workers' GRM with functioning uptake channels?				**LMP** **GRM**	**ON PROJECT LEVEL** **ON SUBPROJECT/ CONTRACTOR LEVEL**	
Does the subproject have a Code of Conduct that is circulated to and signed by all workers?				**CoC**	**ON PROJECT LEVEL** **ON SUBPROJECT/CONTRACTOR LEVEL**	
Will works financed include construction, reconstruction or demolition works? Based on the scope and assessment recommendations, if risks are low to moderate, a checklist of mitigation measures will be prepared and adhered to, if risks are high to substantial. A C-ESMP will be needed from the contractor				**ESMF** **LMP on OHS**	**ON SUBPROJECT/CONTRACTORLEVEL**	
Will the subproject be able to provide workers with worksite facilities including potable water, sanitation, resting area?				**LMP and National**	**ON SUBPROJECT LEVEL**	

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
				Legislations (PLL)		
Do the subproject and financed activities carry GBV (SEA / SH) risks? Are the financed activities expected to be sensitive to such risks?				**LMP** **ESMF** **GRM**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Are there adequate mitigation measures for GBV risks and potential impacts? Does the Workers' GM include provisions related to GBV grievances?				**ESMF** **LMP** **GRM** **CoC**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Are associated OHS risks High or substantial?				**LMP on OHS**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Is there a risk that any employment resulting from the execution of the financed activities will be biased towards				**ESMF** **LMP**		

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
marginalized and vulnerable groups (e.g., women, people with disability)				**SEP**	**ON SUBPROJECT LEVEL**	
Is there a risk of unfair recruitment process if the financed activities will require recruitment activities?				**LMP** **GRM** **National Legislations (PLL)**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Does the subproject apply national measures and commit to the Ministry of Health regulations in regard to communicable diseases?				**ESMF** **LMP**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
In terms of communicable diseases' risks, do the financed activities and their execution require any public gatherings of any sorts?				**LMP** **SEP**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
ESS3: Resource Efficiency and Pollution Prevention and Management						
Are the financed activities expected to be associated with generation of E-waste?				**E-WMP** **C-ESMP***	**ON PROJECT LEVEL**	

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
					ON SUBPROJECT LEVEL	
Are the financed activities expected to be associated with generation of substantial quantities of construction/demolition waste?				**ESMF** **C-ESMP***	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Are the financed activities expected to entail the use / generation of hazardous chemical material / waste?				**ESMF** **C-ESMP***	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Are the financed activities expected to generate dust / noise / vibrations / nuisance?				**ESMF** **C-ESMP***	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
ESS4: Community Health and Safety						

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
Are the financed activities expected to carry discriminatory or adverse negative impacts on vulnerable and marginalized groups				**ESMF** **SEP**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Are the financed activities expected to include measures to facilitate the access of vulnerable or disadvantaged persons to the benefits of the project? (examples: transportation, strategic location that is reachable by the stakeholders, facility and meeting hall equipment, ramps, and others)				**ESMF** **SEP**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Do the financed activities carry any high or substantial risks of causing incidents to the population and neighboring communities?				**ESMF**	**ON SUBPROJECT LEVEL**	
Is there a risk of increasing the probability / creating GBV potential impacts due to the execution of financed activities?				**ESMF** **GRM** **CoC** **LMP**	**ON PROJECT LEVEL** **ON SUBPROJECT LEVEL**	
Does the subproject have the potential to upset community dynamics? (Impacts on community culture, roles, religious believes, and social structure. For example: introducing				**SEP** **GRM**	**ON PROJECT LEVEL**	

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
information that could contradict with the local society's beliefs or religion)					**ON SUBPROJECT LEVEL**	
Will the financed activities present hazards to community members on the sub-project site?				**ESMF** **C-ESMP***	**ON SUBPROJECT LEVEL**	
Will the financed activities pose traffic and road safety hazards?				**ESMF**	**ON SUBPROJECT LEVEL**	
ESS10: Stakeholder Engagement and Information Disclosure						
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?				**SEP**		
Has there been previous cases of exclusion of persons with disabilities or other marginalized related to the project's implementation? groups (women, children, ethnic minorities, elderly) in the area?				**SEP**		
Are women likely to participate in decision-making processes regarding the activity?				**SEP**		

- SECTION 5: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST – ** Please recreate the table below for both (I) construction (ii) operation phases.						
POTENTIAL ENVIRONMENTAL / SOCIAL RISKS	**Yes**	**No**	**I don't know**	**If answer is "yes", Please refer to**	**Comments**	**Recommended Mitigation Measures**
Is there a risk that exclusion of beneficiaries will lead to grievances?				**SEP** **GRM**		
Will communicable diseases' restrictions impact proper stakeholder engagement?				**WHO and National MOH guidelines**		
Have the financed activities been designed with sufficient stakeholder engagement activities during the design process?				**SEP**		

*If one of the recommended mitigation measures states that it is needed.

** ESS not triggered per the DWBG Project ESMF

- SECTION 6: SUMMARY OF THE SCREENING PROCESS –

	E&S Screening	Results and Recommendations		
	Relevant ESSs for this subproject	List ESSs		
Phase (Construction / Operations)	Summary of Critical Risks and Impacts identified	Risk / Impact	Individual Risk/ Impact Rating (low, moderate, substantial, High)	Summary of Mitigation Measures
	1.			
	2.			
	3.			
	4.			
	5.			

Additional Assessment Requirements	
Screening Result	Summary of Screening Result Justification
1. No further E&S assessment required	e.g. “Low risk sub-project”
2. No further E&S assessment required but could require E&S mitigation measures clauses and checklist, or a simple ESMP depending on technical recommendation	e.g. “Low to Moderate risk sub-project”
3. Detailed ESMP	e.g. “Moderate risk sub-project.
4. Detailed ESMP	e.g., “substantial risk sub-project.
5. ESIA required. Conducted by a third party	e.g. “Substantial to High-risk sub-project”

Is this activity excluded under the Project	Yes / No

- SECTION 7: E&S CLAUSES AND CHECKLIST FOR INCLUSION IN BIDDING DOCUMENTS –

ITB 12.1 (i):

List of management plans and E&S instruments

E&S Screening Conducted by:

_____

Signature:

_____

Date: ____/____/_____

PMU Director:

_____

Signature:

_____

Date: ____/____/_____

11.3. Form for Monthly Monitoring Report

Table 10: Monthly Monitoring Report

No.	Mitigation measure	Dates of monitoring Inspections	Status of compliance	Corrective actions needed

Complaints received:

Table 11: Monitoring Report

Digital WB&G Project [i]	Sub-Project Location and Contact information [ii]	Date [iii] Table A (Screening Environmental and Social Impacts) Completed	Date [iii, iv] Environmental and Social Safeguards Project Monitoring Form Completed	Number of [v] complaints received	Frequency of site visits(s)[vi] For this QPR	EQA site visit(s) [vii, viii] For this QPR	Comments /Issues

i. the Digital WB&G Quarterly Progress and Monitoring Report should include a row for each proposed and accepted sub-project;

ii. Each sub- project should have its own row;

iii. The exact dates on which each of the forms (Table A, Project installation Monitoring) have been completed, for each sub-project, should be written in the QPR chart. These dates should be copied from the dates on the forms;

iv. The Environmental and Social Safeguards Project Monitoring Form should be filled out once per month – in the timeframe between the beginning of installation, through the installation phase, until the end of installation. The frequency of site visits (and form of completion) will further depend on the size of the sub-project and its complexity;

v. As noted in comment ii, there should be a reporting line for each sub-project so that we know for which sub-project the complaints were received. Record "0" if no complaints have been received. If any complaints have been received, there should be a separate paragraph for each relevant project. This paragraph should include a description of:

- what the complaints have been;
- if/ how the project proponent/ sub-contractor recorded the complaints;
- if/ how the project proponent/ sub-contractor responded to the complaints;
- if/ how the project proponent/ sub-contractor replied back to the person who complained (i.e. was there follow-up with the person who complained)?
- If/ how the project proponent/ sub-contractor records when each complaint was considered closed/ resolved.

vi. This column is to record frequency of the EHS OFFICER site visits. This can be either a number or a description ("at least once", "weekly during installation phase", "daily during installation phase", etc.);

vii. It is expected that each sub-project should be visited at least once during installation, and, if the installation period exceeds one month, once per month. However, it may not be the case that every project is visited during the period of each QPR, as some projects may either not have started installation, or, alternatively, may have completed installation;

vii. It is expected that any site visits where issues have been found will be described further in the written section of the QPR.

11.4. Sample Environmental and Social Monitoring Form

A. Institutional Arrangements and Documentation

1. Has the project been identified to have negative environmental and social impacts? Yes___ No ___

If "Yes", does the contractor include an environmental and social specialist/ site engineer? Yes__ No ___

2. Does the contractor have a copy of the Environmental and Social Management Plan (ESMP)? Yes___ No ___
3. Is the project causing negative environmental or social impacts or nuisance? Yes_____ No_____

If "Yes", is the contractor carrying out environmental due diligence (mitigation) as required by the ESMP (e.g. relating to OHS, noise, waste, etc.)? Yes_____ No_____

Comments:

……
……
……

4. Is environmental compliance and social risk being monitored and reported in the supervision reports? Yes_____ No _____
5. Does the project management team include environmental and social staff or consultant? Yes_____ No _____

If "Yes", is the above individual trained on ESMP and World Bank standards? Yes_____ No_____

6. Does the project management team include a Monitoring and Evaluation (M&E) specialist? Yes_____ No _____
7. Is information relating to environmental compliance included (separate annex or paragraphs) in Project Progress Reports? Yes_____ No _____

General Comments on social and environmental impacts:

……
……
……

Pollution, Degradation, Contamination and Erosion

8. Does the project require large amounts of raw material and installation material to be sourced? Yes_____ No _____
9. Does the project involve cutting down of trees or other vegetation? Yes_____ No _____
10. Is the project causing degradation to any wetlands, streams or other natural areas? Yes____ No _____
11. Is the project generating large amounts of residual wastes (solid/ liquid waste)? Yes___ No ____
12. Is the project causing soil or water contamination (e.g. from fuel, equipment)? Yes_____ No_____
13. Is the project using any chemicals thereby causing soil and water contamination? Yes_____ No_____
14. Do the project activities involve or generate any hazardous waste substances? Yes_____ No _____

If "Yes", are these being handled and/ or disposed as identified in the ESMP and in pre-identified and approved sites? Yes_____ No _____

15. Is the project causing any cumulative negative environmental impacts or unanticipated negative environmental impacts beyond the footprint of the project? Yes_____ No_____

Comment:

……
……
……
……

16. Has the project come across any 'chance finds' during implementation (e.g. artifacts, gravesites, cultural heritage sites and/or artifacts)? Yes_____ No_____

If "Yes" what procedure has been followed by the project? Comment:

……
……

General Comments:

……
……
……

B. Community, Health and Safety

1. Are there any community concerns/ complaints relating to negative environmental impacts?

If "Yes", are they being addressed? Yes_____ No _____

2. Are on site workers equipped with Personal Protective Equipment (PPE)? Yes_____ No_____
3. Is the project causing an issue for traffic or pedestrian safety? Yes_____ No_____
4. Does the contractor have adequate medical emergency supplies (first aid kit) on site? Yes____ No ____
5. Is the project causing sanitation related environmental issues? Yes____ No ____

   If "Yes", are mitigation measures being applied? Yes_____ No _____

General Comments:

……
……
……

Assessed/prepared by	Reviewed and corrected by
Name: _____ Title: _____ Date: _____	Name: _____ Environment, Health and Social Officer Date: _____

11.5. Sample Environmental and Social Management Plan

Guidelines for preparing ESMP: An ESMP is needed for moderate risks projects in order to identify the potential impacts and appropriate mitigation measures to be included in the ESMP. Any ESMP would have the following format:

1. **Project Description;**
2. **Description of Adverse Impacts:** The anticipated impacts are identified and summarized.
3. **Description of Mitigation Measures:** Each measure is described with reference to the impacts it is intended to deal with. As needed, detailed plans, designs, equipment description, and operating procedures are described;
4. **Mitigation Indicators and Description of Monitoring Program:** Monitoring provides information on the occurrence of impacts. It helps identify how well mitigation measures are working, and where better mitigation may be needed. The monitoring program should identify what information will be collected, how, where and how often. It should also indicate at what level of effect there will be a need for further mitigation. How environmental impacts are monitored is discussed below;
5. **Monitoring methods:** Methods for monitoring the implementation of mitigation measures or environmental impacts should be as simple as possible, consistent with collecting useful information, so that the project implementer can apply them. For instance, they could just be regular observations of the project activities or sites during installation and then when in use. Are plant/ equipment being maintained and damages repaired, does a water source look muddier/cloudier different than it should, if so, why and where is the potential source of contamination. Most observations of inappropriate behavior or adverse impacts should lead to common sense solutions.
6. **Responsibilities:** The people, groups, or organizations that will carry out the mitigation and monitoring activities are defined, as well as to whom they report and are responsible. There may be a need to train people to carry out these responsibilities, and to provide them with equipment and supplies.
7. **Implementation Schedule:** The timing, frequency and duration of mitigation measures and monitoring are specified in an implementation schedule and linked to the overall project schedule.
8. **Capacity Development and Training:** If necessary, the ESMP can recommend specific, targeted training for project staff, contractor, and community groups to ensure the implementation of environmental recommendations.
9. **Cost Estimates and Source of Funds:** These are specified for the mitigation and monitoring activities as a project is implemented.
10. **Integration:** The ESMP must be integrated into the project's plan and design, budget, specifications, estimated costs, bid documents, and contract/ agreements clauses. Contract documents should only be finalized when site-specific ESMP recommendations are adequately and appropriately incorporated into the plan and design, cost estimates, specifications, and contract clauses.

Table 12: Generic ESMP

During installation Phase					
Environmental and Social Aspects	**Potential Negative Impact**	**Mitigation measures**	**Responsibility of execution**	**Monitoring procedures and measures**	**Monitoring responsibility**
Telecom Services	Temporary disturbance of businesses and facilities benefiting from the project.	• Notification of receptors at least one week in advance of the schedule and duration of the work. • Coordinate with service providers to ensure continued access during works implementation.	Contract responsible for implementation/ supplier	- Contractor will document notification materials and other communications. - Contractor will provide contact reports with affected parties. - Ensure that mitigation measures are incorporated into bid documents. - Contractor shall implement required mitigation measures.	Contractor, PMIU, SPs.
Air Quality	Noise (Vibration and noise nuisance)	• installation activities will occur within specified daylight hours. • Temporary noise barriers will be installed at site to	Contractor	- Existence of noise barriers and suppression systems. - Ensure that mitigation measures	Contractor, PMIU.

		minimize harmful noise levels. • Community/ public to be informed in advance of any work activities to occur outside of normal working hours or on weekends. • Noise suppression equipment or systems supplied by the manufacturer will be utilized. • Ensure all vehicles and equipment are properly serviced.		are incorporated into bid documents.	
Waste	Poor management, compilation and improper disposal of waste may cause environmental and visual impacts.	• Develop and implement waste management plan in consultation with the local authorities. • Abide by all pertinent waste management and public health laws. • Waste collection and disposal pathways and sites will be identified for all major waste types expected	Contractor	Ensure that mitigation measures are incorporated into bid documents.	Contractor, PMIU, EQA.

		from the installation activities. • Waste will be stored in appropriate bins. • All waste will be collected and disposed of properly in approved landfills. The records of waste disposal will be maintained as proof for proper management as designed. • Whenever feasible, the contractor will reuse and recycle appropriate and viable materials (except hazardous materials).			
e-waste	Poor management, compilation and improper disposal of e-waste may cause environmental and health impacts, as well as an unpleasant visual impact.	• Reduce hazardous e-waste generation by implementing stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste. • Reuse/ recycle products that can be reintroduced into the operational processes.	Contractor	Ensure that mitigation measures are incorporated into bid documents.	Contractor, PMIU, EQA.

		• Investigation of markets for recycling by other industrial processing operations located in the region. • Establishing of formal tracking of e-waste generation and recycling rates. • On-site or off-site treatment of the e-waste material to render it non-hazardous prior to final disposal.			
Occupational Health and Safety; including risk of Communicable diseases	Injuries during working with tools.	• implement OHS and Environmental Guidelines for beneficiaries including among others: - Provide training for workers - Respect all safety measures required for operation work - Provide workers with protective personal equipment (PPEs)	Contractor	- Contractor will provide safety training and inspection. - All accidents will be reported. - Unsafe conditions will be corrected. - Agency review of emergency response plan.	Contractor, PMIU, MoL, MoH.

		- Prepare an Emergency Response Plan (ERP) • Develop and implement grievance mechanism for workers • Alternating team when there is a communicable disease, Follow MoH procedures and instructions.			
Labor and working conditions	• Terms and conditions of employment are not in accordance with the requirements of national law and ESS2. • Risk of stress, fatigue or burnout of staff of PMIU, HCPPP due to overworking to manage the project activities.	• Implementation of LMP (separate document) for mitigating the labor and working conditions. • Ensure that terms and conditions of all project's workers are in accordance with the requirements of national law and ESS2 as indicated in the LMP. The project's workers will be able to lodge their complaints, concerns, difficulties to the Workers' GRM.	PMIU, MTDE, Contractor.	- Review Terms and Conditions of Employments	Contractor, PMIU, MoL.

Social exclusion or inequity	• Could arise from lack of fairness and equity in decision-making.	• Ensure fair competition by creating a level playing field. • Ensure that project benefits, such as job opportunities, can be accessed and optimized for the most vulnerable and youth, including those from poor communities and women • Ensure access to information and transparency in decisions • Undertake public consultation and information dissemination • Establish and create awareness on grievance redress mechanism.	MTDE, PMIU, Contractor.	- Existence of criteria for selecting beneficiaries. - Existence and activation of GRM.	PMIU, MoSD, MoL.
GBV and SEA/SH	• Exposure of youth, including vulnerable youth and women to possible GBV and SEA/SH concerns	• The project level GRM should include specific procedures for GBV/SEA/SH including confidential reporting and ethical documentation of relevant cases.	PMIU, Contractor	- Documentation and reporting of any incident.	PMIU, Police, MoWA, MoSD.

Post-Development Phase					
Infrastructure and e-Services	Increase access to high-speed broadband services. Increase access to selected digital public services, including for response, recovery and resilience from shocks.				
Socio-Economic	Improvement of the existing and future quality of life.				

11.6. Occupational Health and Safety Guidelines

11.6.1. Purpose and Objectives

This occupational health and safety (OHS) requirements document aims to provide the Digital West Bank and Gaza (DWBG) Project's contractors with the necessary requirements and guidance to apply OHS measures and promote a healthy and safe working environment. This set of OHS guidelines and requirements aim to:

- Provide instructions and guidance to the contractors, subcontractors and project team on the development and implementation of the project specific environmental, social, and OHS requirements.
- Promote a healthy and safe working environment.
- Provide guidance to contractors on how to identify and incorporate safety considerations from design to implementation of project activities.
- Detail the minimum safety requirements in the subprojects' sites.
- Provide guidance on ensuring compliance with all relevant statuary requirements.
- Establish roles and responsibilities associated with environmental, social and OHS management.
- Eliminate and prevent any environmental, social, health, or OHS related hazards within the working environment, and control hazards at source if possible.
- Promote safety aware and safety conscious project workers within the project staff, contractors, subcontractors and visitors within project premises.

11.6.2. Governing Documents and E&S Instruments

This document sets out guidelines/requirements for the contractor/other parties to comply with during the project. The governing regulation of this document is the Palestinian Labor Law, and other applicable national laws. This document shall be read in conjunction of the below other relevant/related documents:

1. Digital West Bank and Gaza (DWBG) - Labor Management Plan: https://documents1.worldbank.org/curated/en/818321615214912208/pdf/Labor-Management-Procedures-Digital-West-Bank-amp-Gaza-P174355.pdf

2. Digital West Bank and Gaza (DWBG) - Environmental and Social Management Framework: https://documents1.worldbank.org/curated/en/149331615214881212/pdf/Environmental-and-Social-Management-Framework-ESMF-Digital-West-Bank-amp-Gaza-P174355.pdf

11.6.3. Demarcation of Responsibilities

The environmental and social instruments of the DWBG project clearly establish roles and responsibilities in terms of environmental and social safeguarding. For this, the following are the key personnel involved in the implementation of the environmental and social safeguarding;

- **The Environmental and Social Specialist**: The Project Management Unit's (PMU) specialist responsible for the implementation of the E&S Safeguarding on the owner's level.

- **The Environmental and Social Officer/Focal Point**: The contractor's personnel responsible for the implementation of the management and mitigation measures as set forward in this document and other project management plans.

The E&S Specialist, the contractors, subcontractors, and subprojects site management shall commit to guarantee the compliance with the legal and statuary requirements regarding Occupational Health and Safety, as well as environmental and social safeguarding in line with the national applicable laws and regulations, and the World Bank's ESF. These project specific E&S instruments are the Environmental and Social Management Framework (ESMF), the Labor Management Procedures (LMP), and the Stakeholder Engagement Plan (SEP). In addition to the commitments required in the Environmental and Social Commitment Plan (ESCP). all available at MTDE's website through: https://mtit.pna.ps/Site/Projects/1#Project_Documents_1

11.6.3.1. Contractors' Roles and Obligations

Upon awarding the contract to the contractor, the contractor will be held responsible of the occupational health and safety of his working staff, subcontractors if any, employees on site, and visitors during the contract duration, and will bear all costs to prepare, implement and maintain OHS measures, including but not limited to the following:

- The contractor shall appoint one or more E&S officer, or designate an E&S focal point, depending on the requirements of the work at the site, and per the approval of the project owner. If the risks identified are minor, a focal point shall suffice subject to the owner's approval. The E&S officer/focal point shall be responsible for the implementation of OHS aspects in addition to the other Environmental and social aspects described in the E & S instruments. The E&S Officer/focal point should have relevant education and qualifications.
- The contractor will be responsible for preparing an Emergency Response Plan (ERP), that will detail the Contractors processes for dealing with emergencies including injury.

- Also, the contractor shall prepare site-specific OHS plan, as required, including precautions for communicable disease, GBV risks mitigation measures, and grievances redress arrangements. The OHS plan should then be made available to all interested parties and be prepared with input from workers. Additionally, the plan would clarify responsibility matrix, risk assessment, job hazards assessment and mitigation measures that should be in place for each job.

- The contractor shall provide adequate personnel protective equipment (PPEs), tools, and first aid at no cost for employees, maintain their proper usage and ensure training of the workforce at all levels.

The contractor will ensure that appropriate signage is posted in critical locations to alert workers of potential risks.

- The contractor shall be responsible for providing the employees under his responsibility with Medical Insurance during the contract's duration in accordance with the relevant laws.

- The contractor shall commit to amending any non-compliance as instructed within a period of 24 hours since receiving the instruction letter from the E&S Specialist, otherwise the E&S Specialist has the right to cease the contractor's activities until an adequate action is implemented to rectify the situation. This shall be reflected in the bidding documents through relevant clauses and the contractor shall not request any VO or compensation for any time lost.

- Penalties if non-conformity situations occur repeatedly, or if such lack of commitment causes delays to the implementation schedule will be applicable according to relevant contractual clauses.

- The contractor shall ensure that all their workers are aware of the codes of conduct (CoC) and shall provide the E&S Specialist with copies of all their employees, workers, and subcontractors signing them.

- The contractor shall develop and implement a grievance mechanism (GM) for the workforce prior to the start of civil works. This grievance mechanism shall also address child labor, GBV and sexual harassment related grievances. The PMU has created a workers' grievance mechanism that the contractor may copy and enhance to suit the needs and nature of their workforce and duties. As a result, the GM shall develop features to accept and respond to anonymous complaints (i.e. complaints box). Information about the existence of the grievance mechanism, such as telephone number, email or suggestion/complaints boxes, will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed. The contractor shall record all received grievances as well as the resolution date in a log that shall be monitored by the project's E&S Specialist. The Contractor shall assign a GM Designated Personnel to follow up on grievances resulting from their workforce. Additionally, the contractor shall include this in their training plan and shall circulate a simplified version in Arabic of the GM.

- Provide a safe workplace. Risk Assessment Procedures will be completed before the commencement of any installation activities, and safety measures will be implemented in accordance with applicable safety standards;

- Include but not limited to fall prevention and working at heights safety measures, protection against falling objects, prevention of accidents due to moving vehicles, protection against risk of electrocution, as needed;

- Provide an E&S and OHS training plan;

- Provide First aid kits on site. For more serious injuries, there must be a pre-approved health facility for medical treatment, as well as appropriate transportation of injured workers; hence the contractor shall, along with their OHS plan, specify the designated health facility for each sub-project.

- All workers shall abide by the Ministry of Health regulations regarding communicable disease safety,.

- Control access provisions to the site only to authorized people. Workers must be trained to perform hazardous works such as working at heights, confined spaces, welding etc. All workers must complete at minimum an OHS induction to have access to the construction site.

- The contractor will organize and implement periodically safety exercises (for instance in case of fires) to ensure proper levels of alertness and awareness of the workforce.

On the other hand, the contractor shall follow the local regulations regarding to the working hour, the working hour defined by the labor law as follow:

- Maximum working hours is 45 per week from 8:00 AM to 3:00PM (Max. till 5:00 PM when liaised with the site management).

- It is prohibited to do any work before and after the working hours determined in the before mentioned point except in duly authorized conditions and when proper additional measures are in place (e.g. lighting, presence of medical professionals, etc...).

The contractor, or designated representative, shall fully investigate all serious accidents and take remedial steps to prevent repetition of similar accidents wherever possible. The following procedure must be followed by the contractor regarding any incident or accident occurring in the site:

- Any incident or accident, or fatalities will be reported within 24 hours after occurrence to the E&S Specialist who in turn will report this occurrence to the PMU management.
- Provide additional details of the incident/accident in a form of a comprehensive report within 48 hours following the incident.
- The contractor shall be responsible for safety records and shall be responsible for completing safety inspections and maintaining records to reflect findings and corrective actions taken.
- The contractor shall require employees to use suitable tools and equipment in order to ensure working in a safe manner.
- Fire prevention measures shall be established on site during works, including having operational fire extinguishers, avoiding smoking on site, avoiding burning of waste, utilizing steel cutters and other spark emitting machinery only by qualified workers after ensuring that all flammable material are removed from the working site, and inspecting site after works to ensure there are no fire hazards or signs of fire available.

11.6.3.2. Subcontractors OHS Obligations

If subcontractors are to be involved in the project, they shall be subjected to the same requirements on E&S and OHS measures as the contractors.

11.6.3.3. Workers OHS Obligations

Each project worker, as defined in the SEF[4], who is performing their working duties is responsible for assuring safety for themselves; Safety for fellow employees; protection for the public and visitors; and protection for sub-project property and for public and private property. Workers will be in charge of the followings:

- It is the responsibility of each worker to notify their senior or the designated E&S Officer/focal point once an unsafe condition or act is witnessed on the job.

- When a worker is requested to perform duties under unsafe conditions, the worker should not perform those duties without first notifying their superior or the E&S officer/focal point of the existence of such conditions. Works that are hazardous or carry specific risks should have corresponding OHS mitigation measures in place prior to commencement of works.

[4] https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=45&zoom=80

- It's the responsibility of the contractor to provide and enforce the usage of PPE's among workers.

- It is the responsibility of each worker to attend all safety training and meetings possible and to take an active part in safety work.

- It is the responsibility of each contractor to ensure that workers know and understand the safety rules, and the sub-project OHS Plan, which will apply to the work being performed.

- It is the responsibility of management to verify that each worker is acquainted with the principles of first aid and resuscitation as soon as possible.

- All project workers shall read and understand the CoC, it is their right to raise any questions to the E&S officer/focal point. Moreover, they have to understand their right to raise grievances through the workers' GM.

11.6.4. Information Dissemination and Grievances Management

This section lays out the measures for information dissemination and handling of grievances throughout the project cycle. These measures provide a clear channel between the surrounding communities, project workers, and the contractor. The following steps will be followed during the project implementation:

- The contractor's EHS Officer/Focal Point shall be responsible to register any direct complaints resulting at site from the community and shall direct them to the project's grievance mechanism. The contractor shall appoint a GRM designated personnel who can be the EHS officer/focal point.
- Provide a workers' grievance mechanism in line with the project's one, and share it with the workers, personnel and subcontractors.
- To keep in close contact with local authorities to coordinate and resolve any complaint.
- Keep detailed records of all grievances received during preparation and during construction, including contact details of complainers. And it will immediately forward a copy of the recorded grievance to the E&S Specialist, including a proposal to mitigate the grievance.

11.6.5. Monitoring and Reporting

11.6.5.1. Monitoring

Occupational health and safety monitoring needs to be undertaken by the E&S Officer/focal point and to be reported to the Environmental and Social Specialist to verify the effectiveness of prevention and control strategies. The occupational health and safety monitoring program should include:

- The inspection should verify that PPE continues to provide adequate protection and is being worn as required.

- Inspection should verify that all the workforce is adhering to the communicable diseases' mitigation measures in line with the guidelines issued by the Ministry of Health.
- Surveillance of worker's health: health of the Project's staff will be monitored on a regular basis, and continuous monitoring and documentation of communicable diseases' cases.

- Training: Training activities for workers and visitors should be adequately monitored and documented (curriculum, duration, and participants). Emergency exercises, including fire drills, should be documented adequately. Service providers and contractors should be contractually required to submit to the employer adequate training documentation before start of their assignment.

11.6.5.2. Accidents and Diseases Monitoring

Contractors are required to set procedures for reporting and recording accidents and diseases that include, at minimum, the following aspects:

- Occupational accidents and diseases
- Dangerous occurrences and incidents
- Near miss incidents
- Incidents resulting in the loss of working hours/ days

These systems should enable workers to report immediately to their immediate supervisor any situation they believe presents a serious danger to life or health.

The contractor shall submit the OHS compliance data to the E&S Specialist. The information should also include incidents related to any sub-contractors working directly, or indirectly, for the contractor. All reported occupational accidents, occupational diseases, dangerous occurrences, and incidents together with near misses should be investigated by the E&S Officer in the contractor's team. The investigation should result in a report that:

- Establishes what happened
- Determines the cause of what happened
- Identifies measures necessary to prevent a recurrence

11.6.5.3. Reporting

For reporting on hazardous conditions and incidents/accidents, the contractor shall notify the PMU within a maximum of 24 hours of occurrence. And to provide additional supporting details of the incident/ accident within 48 hours of occurrence.

A worker who receives a report of a hazardous condition, either from the public or from another worker, shall immediately refer this information to the person in charge (E&S Officer/Focal Point). The below actions shall be followed when reporting and accident:

- All accidents or incidents related to the project, or ones that have, or could have a significant adverse effect on the environment, the affected communities, the public, or workers and could have resulted in death or serious injury, cases of GBV, SH/SEA or violence against minors, injuries, falls, vehicle accidents, electrocution, and uncontrolled electricity supply problems shall be reported to the E&S Officer/focal point who shall notify the project's E&S Specialist.

The E&S Officer/Focal Point shall:

- Establish the site accident reporting system, customized as necessary to project requirements.
- Inform the E&S Specialist within 1 hour of any incident involving serious bodily injury.
- Inform the E&S Specialist within 6 hours of near miss accidents relating to the execution of the works which, in slightly different conditions, could have led to bodily injury.

- Ensure that all injuries, damages and near miss accidents are investigated and that site supervision is involved in such investigations.
- Review accident reports and make recommendations for the establishment of remedial and long-term actions to prevent a reoccurrence of the event. These recommendations shall be included in the incident report.
- Complete a Final Safety Report at the end of the Project. and submit it to the E&S Specialist who will report the findings to the relevant stakeholders including the Bank.
- In the event of damage to the property of a member of the public, such damage shall be reported to the E&S Specialist.
- No employee shall make statements concerning liability or indicating that settlement will be made in any accident resulting in injury or property damage to a member of the public.
- It is important that the names and addresses of all witnesses be obtained in all accidents involving the public.
- Prepare a report of the causes of the incident and maintain an incident register at all subprojects sites, throughout the duration of the work.

In addition, the contractor will submit a comprehensive monthly OHS report in relation to the execution of the works. The report shall contain the following information:

- List of OHS personnel at present at the site at the end of the month.
- Inspections carried out
- Non-conformities detected, with descriptions of the corrective actions taken.
- Update of the product registers and inventory of hazardous waste and/ or electronic waste.
- Monitoring results
- Health & safety statistics about accidents/incidents, preventive/corrective actions
- Training activities
- Near miss
- incidents log and reports

11.6.6. Training

The employed staff including management, supervisors, and workers of the contractor need to receive basic OHS training to ensure proper orientation to the general and specific hazards of individual work assignments. Staff and workers shall receive awareness sessions that include information on workers GM, GBV, SH and SEA.

In general, the OHS training would cover the followings:

- Basic hazard awareness & color coding,
- Site-specific hazards,
- Safe work practices,
- Workers GM
- Code of Conduct including GBV, SH and SEA related issues, and

- Emergency procedures for fire, chemical spill, gas leak, evacuation, and disaster emergency management

Drills should be conducted periodically to ensure the alertness and awareness of the workforce is not dulled.

Further details need to cover the followings:

- Knowledge of materials, equipment, and tools
- Known hazards in the operations and how they are controlled
- Hygiene requirements
- Wearing and use of protective equipment and clothing
- Appropriate response to operation extremes and accidents
- Principles of first aid
- communicable diseases' mitigation measures
- Environmental and social risks and mitigation measures

11.6.7. OHS Risks and Hazards

11.6.7.1. Physical Hazards

Physical hazards represent potential for accident or injury or illness due to repetitive exposure to a mechanical action or work activity. Single exposure to physical hazards may result in a wide range of injuries, from minor and medical aid only, to disabling, catastrophic, and/or fatal. Multiple exposures over prolonged periods can result in disabling injuries of comparable significance and consequence.

11.6.7.2. Rotating Machinery

Possible injury or death can occur from being trapped, entangled, or struck by machinery parts due to unexpected starting of equipment or unobvious movement during operations. Therefore, safety measures as well as respective Personal Protection Equipment's (PPEs) as per the safety Data Sheet (SDS) for each equipment need to be adopted and implemented. Additionally, machinery shall only be operated by qualified personnel and workers with the required qualification.

11.6.7.3. Noise

The contractor will ensure that no employee/ worker will be exposed to a noise level greater than 85 dB for a duration of more than 8 hours per day without hearing protection measured regularly.

The contractor's E&S Officer/Focal Point shall ensure that excessive noise generating equipment and noise control equipment are maintained regularly according to the preventive maintenance schedule.

The E&S Officer/Focal Point shall promptly raise work orders to service and repair equipment that is generating abnormally excessive noise.

The E&S Officer/Focal Point shall ensure that non-routine activities (e.g., drilling) which generate excessive noise are scheduled during daytime hours as mentioned above and in coordination with the site management.

11.6.7.4. Slipping and Fall from Heights

Falls from elevation associated with working with ladders, scaffolding, telecommunication towers, and partially built structures are among the most common cause of fatal or permanent disabling injury at construction or decommissioning sites. If fall hazards exist, a fall protection plan should be in place which includes one or more of the following aspects, depending on the nature of the fall hazard, including: training and use of personal fall arrest systems, as well as fall rescue procedures to deal with workers whose fall has been successfully arrested, the tie in point of the fall arresting system, use of control zones and safety monitoring systems to warn workers of their proximity to fall hazard zones, as well as securing, marking, and labeling covers for openings in floors, roofs, or walking surfaces, workers wearing appropriate PPE (e.g., hard hats, safety boots), and installing proper signs in Arabic.

The works are not expected to include work from heights, however if needed and identified through the course of implementation, the E&S Specialist has to be informed prior to installation works to determine appropriate mitigation measures.

11.6.7.5. Falling Objects

Struck-by-falling-objects is a common hazard on the work site and could result in injuries that range from fractures, bruises, and cuts to fatal injuries. This type of hazard typically exists on sites where working beneath scaffolds or other areas where overhead work is being performed. Falling objects can become a source of concern when workers at elevated levels area using power tools or performing tasks that include pushing, pulling or prying objects.

The works anticipated in the DWBG Project do not include working at elevations or under scaffolds or overhead works. However, if such risks are identified, hardhats must be provided to employees, staff and visitors and all personnel on site. Additionally, material must be safely and securely stacked to prevent them from falling or collapsing.

11.6.7.6. Moving Vehicles

Traffic and pedestrian movement around the workplace can be accompanied by hazards where people can be hit by moving vehicles, people injured by objects falling from vehicles, people injured by vehicles overturning or when slow and heavy moving vehicles are reversing. Additionally, loading and unloading activities can result in accidents in the workplace by unsafe handling of objects while loading/unloading, non-adherence to safety equipment, and falling objects.

The DWBG Project activities do not require heavy vehicles typically involved in infrastructure type projects. However, if such vehicles or machinery (e.g., trucks, vans, forklifts) are to be used in any of the project's activities, contractors are required to include moving vehicles hazards in their OHS risk assessment and provide mitigation and control measures accordingly.

11.6.7.7. Electricity and Electrocution

Electrical works shall only be installed and maintained by qualified and specialized personnel. Adequate measures shall be implemented by the contractor to eliminate risks to personnel, workers and visitors against live electrical wires or apparatus within the site.

All parts of electrical installations shall be of adequate size and characteristics for the power requirements and work, and in particular:

- Be of adequate mechanical strength to withstand working conditions in construction activities.
- Not be liable to damage by water, dust or electrical, thermal or chemical action to which they may be subjected in construction activities.
- The power supply to all electrical equipment should be provided with means of cutting off current from all conductors in an emergency.
- All electrical appliances and outlets should be clearly marked to indicate their purpose and voltage.
- Adequate precautions should be taken to prevent installations from receiving current at a higher voltage from other installations.

To prevent exposure to electrical risks, the following must be considered:

- Marking all energized electrical devices and lines with warning signs
- Checking all electrical cords, cables, and hand power tools for frayed or exposed cords and following manufacturer recommendations.
- Double insulating / grounding all electrical equipment used in environments that are, or may become, wet.
- Protecting power cords and extension cords against damage from traffic by shielding or suspending above traffic areas.
- Use the correct cable connectors or couplers to join lengths of cables together and do not allow taped joints.
- Electrical installations are installed and maintained by a competent person and checked regularly
- Socket Outlets are not overloaded by the use of adaptors
- Electrically powered equipment provided is suitable for use

11.6.8. Communicable Diseases' Transmission Precautions

Communicable diseases' precautions and commitments include adhering to the Ministry of Health and the WHO guidelines. The contractor should Alternate the team of any presence of communicable disease.

11.6.9. Disposal of Waste Materials

All waste material and rubbish shall be removed from the immediate work area on a daily basis as the work progresses. Disposal of waste material or debris shall be to the identified waste landfill in liaison with the local municipality.

Also, the waste management shall be segregated by type and classification as follow:

- Hazardous Wastes
- Food Wastes
- Recyclable / Reusable Materials

- Temporary storage shall be carried out for homogeneous waste categories and in compliance with the related technical standards, as well as, for hazardous waste, in compliance with the standards that regulate the storage of dangerous substances contained in them.
- It is forbidden to mix hazardous waste having different dangerous characteristics or to mix hazardous waste with non-hazardous ones. Mixing causes, the dilution of dangerous substances.
- Hazardous waste shall be discarded in special containers that are to be provided by the contractor.
- E-waste has to be stored separately, and quantities, type, and other information to be recorded.
- Housekeeping shall be conducted, and site to be left as entered.

11.6.10. Fire Risks and Mitigation Measures

The contractor's E&S Officer/Focal Point in coordination with the contractor's management shall be responsible for the preparation and implementation of the OHS requirements and the ERP in compliance with the national regulations related to fire protection.

Fire prevention and protection measures shall be implemented in accordance to the national regulation. The fire protection measures should be maintained throughout project implementation.

11.6.11. Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) provide additional protection to workers exposed to workplace hazards. The Contractor is responsible for providing PPEs and requiring their workers to adhere to wearing appropriate personal protective equipment in all operations where there is an exposure to hazardous conditions and where there is a need for using such equipment to reduce the hazards to the workers, employees and visitors.

All personal protective equipment shall be of safe design for the works to be performed. High visibility waistcoats shall be provided to all workers. Additional PPE requirements, e.g., fall protection, respiratory protection, face shields, hearing protection, gloves, winter PPE, etc., shall be determined/mandated by the nature of the individual work activities.

PPE should be stored, maintained, cleaned, if necessary, for health reasons, disinfected or sterilized at suitable intervals. Workers should be required to make proper use of and to take good care of the personal protective equipment and protective clothing provided for their use.

Where there is no practical alternative to the use of PPE, appropriate training shall be given to employees to ensure that they are fully aware of the processes and equipment they are working with. Appropriate PPE for the project shall consist of the following:

- Safety helmet

Safety vests

- Light duty safety glasses
- Safety boots
- Safety gloves, protection against cuts or sharp materials
- Protection against cold or heat
- Protection against electrical hazards

Harnesses

11.6.12. First Aid

The following are nine general directions for first aid in an emergency, outlined by the American Red Cross.

- Keep the victim lying down.
- Examine the victim - look for serious bleeding, lack of breathing, and poisoning.
- Keep the victim warm.
- Send someone to call a physician or ambulance.
- Remain calm. Do not be rushed into moving the victim unless absolutely necessary.
- Never give an unconscious victim anything to eat or drink.
- Keep the crowd away from the victim.
- Ensure the victim is comfortable and cheerful.
- Don’t allow the victim to see his injury.

At least one employee/worker trained in first aid shall be present at all times during working hours and should be capable of carrying out first aid to injured workers including CPR.

The Trained person phone will be distributed to all the workers on the site at highlighted boards and listed in the contact number list.

First aid kits shall be accessible within 2 mins for all locations in subprojects sites.

The first aid equipment may contain and not limited to the following:

- Plasters in a variety of different sizes and shapes
- Small, medium and large sterile gauze dressings
- Sterile eye dressings
- Triangular bandages
- crêpe rolled bandages
- Safety pins
- Disposable sterile gloves
- Tweezers
- Scissors
- Alcohol-free cleansing wipes
- Sticky tape
- Thermometer (preferably digital)
- Skin rash cream, such as hydrocortisone or calendula
- Cream or spray to relieve insect bites and stings
- Antiseptic cream
- Painkillers such as paracetamol
- Cough medicine
- Antihistamine cream or tablets
- Distilled water for cleaning wounds
- Eye wash

Oxygen

And, if possible, a defibrillator in case of accidents causing cardiac arrest.

Knowing what not to do in an emergency is just as important as knowing what to do. The original injury may be magnified by the wrong kind of treatment or mishandling. If a victim must be transported, ensure that methods described in a standard first aid text are used. With neck or back injuries, particularly, serious damage may occur by improperly transporting the victim. If possible, the victim should remain at the site where the injury occurred until a physician arrives, rather than risk an increase to the injury through mishandling. Further information is expected to be received during the OHS training.

11.6.13. Budget and Resources

The following table provides only an indicative budget and resources needed for the implementation of the OHS Contractor requirements as stated in this document. The actual budget will be determined in each case according to the type of project and the size of the workforce.

Activity	Timeline	Cost / Annum
Hiring/Assigning an E&S focal point	Prior to contract signing	21,600$
Preparation of the OHS Plan	Prior to contract signing	3000$
Workers' training sessions	Prior to commencement of works	1000$
Preparing GM material, complaints box, etc…	Prior to commencement of works	1000$
First aid kits	Prior to commencement of works	1500$
PPEs (the contractor, due to their line of work, should already possess such items, hence the cost here is indicative if items were not available)	Prior to commencement of works	2000$
communicable diseases' mitigation measures and PPEs	Prior to commencement of works	500$
SUM		**30,600$**

11.6.14. ANNEX I: Suggested Contents of the Occupational Health and Safety Plan

1 Introduction

1.1 Purpose

1.2Policy and Principals of Safety and Health on Site

2 Roles & Responsibilities

2.1 Contractors' Obligation

2.2E&S Officer

2.3Workers

2.4Safety Meetings

2.5Personal conduct while on duty

2.6Reporting on Hazardous Conditions

3 Training

4 Hazards

4.1 Physical Hazards

4.1.1 Rotating and Moving Equipment

4.1.2 Noise

4.1.3 Electrical Hazards

4.1.4 Eye Hazard

4.1.5 Vehicle driving and site traffic

4.2 communicable diseases' related precautions

4.3 Fire Prevention and Control

4.4 Lifting

4.5 Disposal of waste materials

5 Storage of materials and equipment

5.1 Proper Use and Care of Equipment

6. General Safety Standards

7. Safety Signage

8. Safety Devices and Safe Working Practices

8.1 Clothing

8.2 Personal Protective Equipment

9. Monitoring

9.1 Accidents and Diseases monitoring

9.2 Accident Reporting

11.6.15. ANNEX II: Employees Report of Injury Statement

EMPLOYEE'S REPORT OF INJURY STATEMENT

[Please have employee complete.]

Name: _____ ID Number_____ Male ☐ Female

Address: _____

Home Phone: _____ Mobile Number: _____

Marital Status: ☐ Married
☐ Widowed
☐ Single

Number of Dependents: _____ _____

Date of Injury: _____ Time of Injury: _____ ☐ AM ☐ PM

Job Title: _____

Injury Location:

_____
Building Area Floor Room No.

Explain how and why this injury occurred (Provide as much detail as possible)

Item or equipment involved in accident:

Type of injury: ☐ Burn ☐ Cut/Laceration ☐ Bruise ☐ Strain ☐ Needle stick ☐ Repetitive Motion ☐ Exposure
☐ Bite ☐ Other _____ ☐ None (Incident Only)

Who witnessed the injury/illness/accident? Name(s) address and telephone number(s).

Were you advised of safety policies and procedures required for this job? ☐ Yes ☐ No ☐ Not Applicable

If no, please explain:

_____

If requesting medical treatment, who did YOU select as your treating hospital? _____ Tel. No._____

Signature of Employee: _____ Date: _____

11.6.16. ANNEX III: Sample Safety Inspection Checklist

SAFETY INSPECTION CHECKLIST

Date of Inspection: **Location:**

	Yes	No
Is personal protective equipment (PPE) provided, used and maintained when required?	☐	☐
Is site free from tripping hazards e.g. cables, potholes, footpath defects etc?	☐	☐
Do you have in-house procedures for handling employee safety and health complaints?	☐	☐
Have current weather conditions created new hazards to be addressed?	☐	☐
Are all potentially hazardous activities segregated and/or fenced as required?	☐	☐
Have any unanticipated hazards been introduced?	☐	☐
Are first aid facilities in place?	☐	☐
Is control in place and public address system working?	☐	☐
Were any incidents/accidents reported during the work?	☐	☐
Are tools and equipment tested and in good condition?	☐	☐
Are all ladders maintained and in good condition?	☐	☐

ADDITIONAL REMARKS:

Safety Engineer:

Signature:

11.6.17. ANNEX IV: Suggested Daily E&S and OHS Report Template

Project Name:

Sub-project Name:

Location:

Date:

CONTRACTORS' TEAM

- Site Engineer:
- E&S Officer/Focal Point:
- Technicians:

Description

DESCRIPTION OF IMPLEMENTATION ACTIVITIES ON SITE:

1	**Number of Complaints**	**Description**
2	**Types of Complaints**	
3	**Are Complaints Resolved?**	
4	**If yes, How were they resolved?**	
5	**Have there been any accidents / incidents / near miss / injuries or other forms of hazards and risks on site?** **If yes, elaborate**	☐
6	**Is the implementation work causing any electricity interruptions?** **If yes, when and were the stakeholders, communities and site management informed of any electricity interruptions?**	☐
7	**Is the Implementation work causing any connectivity loss?** **If yes, were the stakeholders informed beforehand that such interruptions will occur?**	☐
8	**Has the contractor prepared a work schedule and management plan prior to commencement of implementation works?**	☐

9	**Were the public and site management informed of the work hours?**	☐
10	**Have any safety incidents / non-compliances been detected?** **If yes, elaborate**	☐
11	**Have communicable diseases' mitigation measures been implemented?** **If any non-compliance detected, elaborate**	☐

REMARKS AND ADDITIONAL DESCRIPTION

SITE ENGINEER NAME: **E&S OFFICER NAME:** **SIGNATURES**

PHOTOS

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11.7. E-Waste: Potential Impacts and Proposed Management

E-waste poses a significant threat to the human health. This may include birth defects, infant mortality, blood diseases, malfunctioning of organs and immune system anomalies (ILO report, 2012).

On the other hand, there are evidence that the improper treatment of this waste has a negative impact on the environment and the public health of both the workers exposed and population living nearby. Different types of e-waste bring different degrees of damage. For example, the treatment of electric cables, that does not have an intrinsic hazardous character (except for cables containing heavy metals), has a primary damage on human health (due to the dioxins released during the uncontrolled combustion of the coating rubber) and a secondary damage on the environment.

Regarding the impacts on the environment, e-waste treatment produces leachates, particle matters, ashes and effluents that contribute to the loss of agriculture land fertility, the pollution of soils, of surface waters, of the air and, on the long term, of ground waters.

Considering that the sector brings a non-negligible financial resource to local residents, there is an urgent need to adopt flexible methods to ensure, as much as possible, the separation between the hazardous and non-hazardous components and to apply modern and safe treatment processes. Another issue is the gap of knowledge about the source, the amount, the processing and end points, which makes the tracking and the quality/ quantity/type monitoring of this type of waste difficult to achieve.

Out of the identified potential environmental and social risks in the ESMF is the generation and management of E-waste which requires its own E-waste Management Plan (E-WMP). Therefore, The E-waste Management Plan [5]shall serve as a guidance document for MTDE and its Project Management Unit (PMU) to meet the challenges for providing a safe, environmentally sound, and unified response for E-waste management. The goal of the E-waste Management Plan is to protect human health and the environment while complying with applicable local regulatory requirements.

This plan involves the tracking of E-waste resulting or associated with the activities of the DWBG Project from the point of generation through its final disposition. MTDE and the project stakeholders shall avoid the generation of e-waste where possible and adopt the (4 Rs) principle; Reduce, Reuse, Recycle and Recover. Where waste generation cannot be avoided, the project shall minimize the generation of waste, and reuse, recycle and recover waste in a manner that is safe for human health and the environment. Where waste cannot be reused, recycled, or recovered, e-waste shall be treated, destroyed, or disposed of in an environmentally sound and safe manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material. All Project Workers involved in any waste management process must read and have a thorough knowledge of the procedures contained within the guidance document : E-Waste Management Plan.

[5] E-Waste Management Plan

11.8. Project Code of Conduct

Below is the Project's Code of Conduct, CoC. An Arabic Version is also available at MTDE website: https://mtde.gov.ps/home/Digital_Services_Development_Project?culture=ar-SA#%D8%A7%D9%84%D8%A7%D8%B5%D8%AF%D8%A7%D8%B1%D8%A7%D8%AA

1. Introduction

The Palestinian Ministry of Telecommunications and Digital Economy (MTDE), herein referred to as the "Ministry", is committed to ensuring a work environment, which minimizes any negative impacts on the local environment, communities, and its workers. MTDE is also strongly committed to creating and maintaining an environment in which Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) have no place, and where they will not be tolerated by any employee, sub-contractor, supplier, associate or representative of MTDE. This document, which is to be circulated and signed by the "Project Workers", as defined in the World Bank's Environmental and Social Framework (ESF), and its Environmental and Social Standard (ESS2)[6] – on Labor and Working Conditions, will govern and set the basis for the ethical relations and values between project workers, between management and employees and vice versa, and the relation of project workers with the community. The Code of Conduct defines labor standards that aim to achieve decent and humane working conditions. This Code of Conduct (CoC) has been prepared in line with the World Bank's Environmental and Social Framework (ESF)[7], The World Bank's Code of Ethics[8], the Palestinian Code of Conduct for Civil Jobs[9], Palestinian Labor Law, and national laws and accepted good labor practices.

2. Definitions

- **Project Direct Workers:** As defined by the World Bank's ESF ESS2, direct workers are people employed or engaged directly by the project proponent (MTDE) to work specifically in relation to the project.
- **Project Contracted Workers:** As defined by the World Bank's ESF ESS2, contracted workers are people employed or engaged through third parties to perform work related to core functions of the project, regardless of location.
- **Sexual and Gender based violence:** An umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed differences between males and females (i.e., gender). It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty.[10]
- **Sexual Exploitation and Abuse (SEA)**[11]: Is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

[6] https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=45&zoom=80
[7] https://www.worldbank.org/en/projects-operations/environmental-and-social-framework
[8] https://documents1.worldbank.org/curated/en/147281468337279671/pdf/WBG-Code-of-Ethics.pdf
[9] https://www.pla.gov.ps/ar/media/post/gallery/2017/1/1014_gallery.pdf
[10] IASC 2015.Guidelines for Integrating Gender Based Violence Interventions in Humanitarian Action
[11] In the context of World Bank Financed operations exploitation occurs when access to or benefit from a World Bank Financed good or service is used to extract sexual gain.

- **Sexual Abuse:** "The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions."
- **Sexual Harassment[12]:** Unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature.
- **Sexual Harassment versus SEA[13]:** SEA occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff of an organization or company and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff training can include specific instruction on the procedures to report each.
- **Consent:** is the choice behind a person's voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent.

3. Purpose and Objectives

This CoC was prepared to ensure transparency and accountability between project workers, management, and the community. It aims to set the basis and achieve common understanding of the principles that align with MTDE and the World Bank's principles. It describes the ethical norms and behaviors expected from the project workers, from management, and from the Ministry.

This code of Conduct is part of the measures to deal with environmental and social risks related to the Works implemented in relation to this project. It applies to all of what the Labor Management Procedures (LMP) and (ESF)'s Environmental and Social Standard on Labor and Working Conditions (ESS 2) define as "Project Workers".

The purpose of this Code of Conduct is to:

1. Create a common understanding of what is expected from each worker, relations between workers, management, and the institution.
2. Define the behavior that is required and expected from all project workers.
3. Eliminate a workplace environment where unsafe, offensive, abusive or violent behavior will not be tolerated.
4. Achieve a workplace environment where all persons should feel safe and comfortable in raising issues or concerns without fear of retaliation.
5. Create a common understanding of what constitutes Sexual Exploitation and Abuse, and Sexual Harassment.
6. Create a shared commitment to standard behaviors and guidelines for company employees to prevent, report, and respond to SEA and SH, and;
7. Create an understanding that breach of this code of conduct will result in disciplinary action.

4. Required Conduct

[12] 3 Inter-Agency Standing Committee Protection against Sexual Exploitation and Abuse (PSEA): Inter-agency cooperation in community-based complaint mechanism. Global standard Operating Procedures. May 2016

[13] In accordance with the United Nations Convention on the Rights of the Child.

All project workers are required to.

1. Carry out his/ her duties competently and diligently.
2. Comply with this Code of Conduct and all applicable laws.
3. Comply with the applicable regulations and other requirements, including requirements to protect the health, safety, and well-being of other workers, staff, personnel, the community, and any other person.
4. Maintain a safe working environment through;

    a. Ensuring that the workplace, machinery, equipment and processes under each person's control are safe and do not pose any risk to health;

    b. Wear required personal protective equipment as required;

    c. Use appropriate measures relating to chemical, physical and biological substances and agents

    d. Follow applicable emergency operating procedures.

5. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
6. Report any situation where conflict of interest might arise, defined as situations where personal interests may interfere with the worker's ability to perform official duties in an impartial manner;
7. Decline any forms of payment, bribe, gifts, facilitation, or other forms of benefits that could provide preferential treatment for a third party;
8. There shall be no use of forced labor, including bonded labor or other forms of forced labor. Workers must report any such occurrences.
9. There shall be no recruitment of child labor. Children as defined by the ESF and the Palestinian Labor Law as being of under 18 years old shall not be recruited to work in relation to this project. Project workers must report any institution, employer, contractor, supplier or other entities employing child labor.
10. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
11. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other project workers;
12. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
13. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
14. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
15. Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

16. report violations of this Code of Conduct; and
17. not retaliate against any person who reports violations of this Code of Conduct, whether to the PMU, senior management or MTDE, or who makes use of the project's Grievance Redress Mechanism.
18. With respect to the communicable disease , project workers are required to abide with the Ministry of Health's (MoH) Workers are required to implement the measures as constructed by MoH in collaboration with the WHO.

5. Raising Concerns

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done through the Project Workers' Grievance Redress Mechanism[14] (GRM) available on the Ministry's website.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations as well as Gender Based Violence (GBV) grievances, and Sexual harassment, exploitation and abuse grievances may also be submitted through the GRM and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

6. CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

[14] https://drive.google.com/file/d/1mF7g1tAwW2Rtu6fWKTRrhV9k8ee20uH1/view?usp=sharing

FORM OF AKNOWLEDGEMENT

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact the Environmental and Social Specialist requesting an explanation.

Name of Project Worker: [_____]

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of MTDE:

Signature: _____

Date: (day month year): _____

ATTACHMENT 1: Behaviors constituting Sexual Exploitation and Abuse (SEA) and behaviors constituting Sexual Harassment (SH)

Individual Signed Commitment regarding Gender and Sexual Based Violence

I, _____, acknowledge that sexual exploitation and abuse (SEA) and sexual harassment (SH), are prohibited. As an employee of the Digital West Bank and Gaza (DWBG) project and/ or the Ministry of Telecommunications and Digital Economy in Palestine, I acknowledge that SEA and SH activities on the work site, the work site surroundings, at workers' camps, or the surrounding community constitute a violation of this Code of Conduct. I understand SEA and SH activities are grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit SEA and SH may be pursued if appropriate.

I agree that while working on the project I will:

- Treat all persons, including children (persons under the age of 18), with respect regardless of sex, race, color, language, religion, political or other opinion, national, ethnic or social origin, gender identity, sexual orientation, property, disability, birth or other status.
- Commit to creating an environment which prevents SEA and SH and promotes this code of conduct. In particular, I will seek to support the systems which maintain this environment.
- Not participate in SEA and SH as defined by this Code of Conduct and as defined under Palestinian laws.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with anyone below the age of 18. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I will not participate in actions intended to build a relationship with a minor that will lead to sexual activity.
- Not solicit/engage in sexual favors in exchange for anything as described above.
- Unless there is the full consent of all parties involved, recognizing that a child is unable to give consent and a child is anyone under the age of 18, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered "non-consensual" under this Code.
- Not engage in child labor and report any incidents of child labor I come aware of.

I commit to:

- Adhere to the provisions of this code of conduct both on and off the project site.
- Attend and actively partake in training courses related to preventing SEA and SH as requested by my employer.
- If I am aware of or suspect SEA and SH, at the workplace, project site or surrounding community, I understand that I am encouraged to report it to the Grievance Reporting Mechanism (GRM) or to my manager. The safety, consent, and consequences for the person who has suffered the abuse will be part of my consideration when reporting. I understand that I will be expected to maintain confidentiality on any matters related to the incident to protect the privacy and security of all those involved.

Sanctions:

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

- Informal warning or formal warning
- Additional training.
- Loss of salary.
- Suspension of employment (with or without payment of salary).
- Termination of employment.
- Report to the police or other authorities as warranted.

I understand that it is my responsibility to adhere to this code of conduct. That I will avoid actions or behaviors that could be construed as SEA and SH. Any such action will be a breach this Individual Code of Conduct. I acknowledge that I have read the Individual Code of Conduct, do agree to comply with the standards contained in this document, and understand my roles and responsibilities to prevent and potentially report SEA and SH issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Name of Project Worker: [_____]

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of MTDE:

Signature: _____

Date: (day month year): _____

ATTACHMENT 1 TO THE CODE OF CONDUCT FORM

BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)

The following non-exhaustive list is intended to illustrate types of prohibited behaviors

Examples of sexual exploitation and abuse include, but are not limited to:

- A project worker tells a member of the community that he/she can get them jobs related to the work site (e.g. cooking and cleaning) in exchange for sex.
- A project worker that is responsible for vaccines says that they can provide vaccinations to women in exchange for sex.
- A project worker rapes, or otherwise sexually assaults a member of the community.
- A project worker denies a person access to the Site/ services unless he/she performs a sexual favor.
- A project worker tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her.

Examples of sexual harassment in a work context

- project worker comment on the appearance of another project worker or staff (either positive or negative) and sexual desirability.
- When a project worker complains about comments made by another worker on his/her appearance, the other project worker comment that he/she is “asking for it” because of how he/she dresses.
- Unwelcome touching of a worker / staff by another project worker
- A project worker tells another project worker that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.