

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

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

**June 1, 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Palestinian Heritage Trail (PHT), the Project Implementation Agency (PIA) (hereinafter the **recipient**) shall implement the Palestinian Heritage Trail: Increased Economic Opportunities and Improved Livelihood for Fragile Communities (P170706) (the **Project**). The JSDF has agreed to finance the Project through the International Bank for Reconstruction and Development (hereinafter the **Bank**).
2. PHT shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. PHT shall also comply with the provisions of any other Environmental and Social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, Environmental and Social Management Framework (ESMF), Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
4. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by PHT as required by the ESCP and the conditions of the legal agreement, and the Bank shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. By agreement between the Bank and PHT, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, PHT shall agree to the changes with the Bank and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between PHT and the Bank. The Borrower shall promptly disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, PHT shall assess these risks and shall ensure that additional funds are provided, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts on labor and working conditions, occupational and community health and safety, and environment.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental and social performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S documents required under the ESCP, stakeholder engagement activities, performance of the grievance mechanism(s).</p> <p>Submit to the Bank the Environmental and Social Due Diligence (ESDD) conducted for the selected beneficiaries for financing.</p>	<p>Starting ninety (90) days after the Effective Date of the Project and then quarterly (every three (3) months) throughout the Project implementation.</p> <p>On a continuous basis, submit to the Bank for review the ESDDs after the Effective Date and throughout the Project implementation.</p>	PHT
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including but not limited to; incidents and accidents encountered during implementation of the Project.</p> <p>Require the selected beneficiaries for financing to provide sufficient details regarding the incident or accident, findings of the Root Cause Analysis (RCA), indicating immediate measures or corrective actions taken or that are planned to be taken to address it, compensation paid, and any information provided by the involved beneficiary, as appropriate.</p> <p>Subsequently, as per the Bank’s request, prepare and submit an incident report, including RCA, precautions and compensation measures taken and propose any measures to prevent its recurrence.</p>	<p>Notify within 48 hours from the occurrence of the incident.</p> <p>Submit an incident report, within 30 business days from date of notification.</p>	PHT
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Enhance and maintain the capacity of the PHT with full-time qualified staff and resources for the management and monitoring of E&amp;S risks and impacts, by appointing: one Monitoring and Evaluation Officer (M&amp;E O) who will be responsible for environmental and social management and he will be supported by an E&amp;S consultant with ESF experience that should be available on a part-time basis.</p>	<p>One recruited M&amp;E/ ES O, shall be assigned to the Project by PHT one month after the Effective Date of the Project.</p> <p>All designated PHT staff for the Project shall be retained for the duration of the Project.</p>	PHT
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>a. PHT shall assess the E&amp;S risks and impacts of proposed Project activities in accordance with ESS1. A draft ESMF, which was prepared by PHT, needs to incorporate the Bank’s comments and the final ESMF to be disclosed and adopted for the Project.</p> <p>b. PHT shall conduct Environmental and Social Due Diligence (ESDD) for the different sub-projects, in line with ESS1 and the ESMF. PHT shall follow the clearance process for sub-projects as described in the Project Operation Manual (POM) and thereafter during project implementation conduct supervision spot checks of the selected beneficiaries.</p> <p>c. Prepare site-specific E&amp;S instruments per the requirements of the ESMF, if and as needed, and incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with beneficiaries and contractors. Thereafter, ensure that the beneficiaries and contractors comply with the ESHS specifications of their respective contracts.</p>	<p>a. The Final ESMF to be prepared and disclosed one month after the Effective Date of the Project.</p> <p>b. Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>c. Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</p>	PHT
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Final Labor Management Procedures (LMP), in accordance with ESS2, shall be prepared (incorporating the Bank’s comments), consulted upon, disclosed and implemented throughout the life of the Project. The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), adequate measures for child labor, GBV, sexual harassment and Violence Against Children (VAC), setting out grievance arrangements for Project workers, and incorporating labor requirements including Occupational Health and Safety into the ESHS specifications of the procurement documents and contracts with third party service providers.</p>	<p>Prepare and disclose Final LMP one month after the Effective Date of the Project.</p> <p>Implement and monitor the LMP starting on the Effective Date of the Project and throughout the Project.</p>	PHT
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Maintain, and operate an accessible grievance mechanism (GM) for Project workers as described in the LMP, consistent with requirements under relevant national law as confirmed by the Bank and ESS2.</p>	Grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation.	PHT
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>To be included in the site-specific E&amp;S instruments and shall be part of the ESDD to be conducted for each sub-project as indicated in action 1.2 above.</p>	Included as part of action 1.2	PHT
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>To be included in the site specific E&amp;S instruments and shall be as part of the E&amp;S due diligence (ESDD) to be conducted by PHT for each sub-project as indicated in action 1.2 above, ESS4 shall be applied within the scope of PHT’s environmental and social management procedures as relevant.</p>	Included as part of action 1.2.	PHT

<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	Not Relevant to the Project	N/A	
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	PHT shall develop environmental guidelines for beneficiaries to prevent degrading natural and physical integrity, damage the natural habitat and wildlife.	Not later than 90 days after the Effective Date of the Project and maintained throughout Project implementation.	PHT
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	Not Relevant to the Project	N/A	
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	PHT shall develop guidelines for beneficiaries to prevent degrading physical cultural resources and adopt chance find procedures for any trail upgrading activities.	Not later than 90 days after the Effective Date of the Project and maintained throughout Project implementation.	
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1.	Not Relevant to the Project	N/A	
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Maintain and implement SEP in a manner acceptable to the Bank.	Maintain and update, if and as required, throughout project implementation	PHT
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Establish, maintain and operate a grievance mechanism (GM), including with requisite staff, as described in the SEP. The GM shall integrate GBV sensitive measures, including multiple channels to initiate a complaint and specific procedures for SEA/SH, such as confidential and/or anonymous reporting with safe and ethical documentation of SEA/SH cases.	GM should be operational not later than 30 days after the Effective Date of the Project and maintained throughout Project implementation.	PHT
<b>CAPACITY SUPPORT (TRAINING)</b>			

CS1	<p>PHT staff to train the beneficiaries as needed on the Bank's E&amp;S requirements on:</p> <ol style="list-style-type: none"> <li>1. Environmental and Social Management Framework</li> <li>2. Environmental, Health and Safety Guidelines</li> <li>3. SEP</li> <li>4. LMP</li> <li>5. GRM including SEA/SH</li> </ol>	Throughput the project implementation	PHT
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