

State of Palestine
Ministry of Telecommunication and IT



دولة فلسطين
وزارة الاتصالات وتكنولوجيا المعلومات

Digital West Bank and Gaza Project

Project ID No. P174355

Environmental and Social Management Framework (ESMF)

January 2021

Table of Contents

0.	Executive Summary	8
0.1	Digital WB&G Project	8
0.2	Justification of the ESMF	8
0.3	Institutional and Implementation Arrangements	9
0.4	Environmental and Social Risk Screening.....	10
0.5	Environmental and Social Monitoring.....	13
0.6	Public Consultations, Grievance and Disclosure	13
0.7	Capacity Building and Training for ESMF	14
1.	Introduction	15
1.1	Background	15
1.2	Digital WB&G Project	16
2.	Project Description and Components	18
2.1	Project Concept.....	18
2.2	Project Components.....	18
2.3	Project Beneficiaries.....	28
2.4	Institutional and Implementation Arrangements	28
3.	Environmental Policy and Legal Framework.....	31
3.1	Applicable Laws.....	31
3.2	Laws and Regulations Relating to Environmental Management	31
3.2.1	Palestinian Environment Law31	
3.2.2	Palestinian Environmental Assessment Policy	32
3.2.3	Public and Occupational Health and Safety.....	34
3.2.4	Grievance, Complaints, and Disputes Resolution.....	36
3.2.5	Other Laws and Regulations relating to Environment Management.....	36
3.3	Institutional Framework.....	36
3.3.1	Palestine’s COVID-19 Response Plan	37
3.3.2	EQA Guideline for Measures to Preserve Public Health, the Environment, and Solid Waste Management to Limit the Outbreak of the New Corona Virus	37

3.3.3	Information and Communication Technology Regulatory Framework.....	38
3.4	World Bank Project Categories and ESSs	39
3.4.1	Applicable World Bank Environmental and Social Standards	40
4.	Baseline Environmental and Social Data.....	43
4.1	General.....	43
4.2	Socio-Economic Context.....	44
4.3	Status of Digital Situation and Transformation.....	46
4.4	Status of Collection, Treatment and Disposal of e-Waste	47
4.5	Status of Gender-Based Violence in WB&G.....	49
5.	Environmental and Social Assessment and Mitigation.....	51
5.1	Environmental and Social Impacts and Risks Identification.....	51
5.2	Environmental and Social Impact Assessment.....	58
5.2.1	Selection of Valued Aspects	58
5.2.2	Mitigation measures	59
5.2.3	Mitigation Specifications	60
6.	Environmental and Social Management Plan (ESMP).....	65
6.1	Environmental and Social Management Plans: Guidelines for Subprojects.....	65
6.2	Guidelines for the Preparation of the Environmental and Social Management Plans (ESMP)	67
7.	Environmental and Social Screening Procedures.....	68
7.1	Screening, Review, and Approval of Sub-Projects	68
8.	Institutional and Implementing Arrangement for the Environmental and Social Framework	69
9.	Stakeholder Engagement, Public Consultations and Disclosure.....	70
9.1	Consultation and Disclosure.....	70
9.2	World Bank Grievance Redressal Service (GRS).....	72
10.	Environmental and Social Monitoring and Capacity Building.....	74
10.1	Environmental and Social Monitoring Guidance	74
10.2	Monitoring, Evaluation, and Reporting Responsibilities.....	74

10.3	Capacity Building and Good Practices.....	75
10.4	Capacity building requirements for Implementation of ESF.....	76
10.5	Budget and Resources.....	77
11.	Annexes	79
11.1	World Bank Environmental and Social Standards (ESSs)	79
11.2	Screening Forms.....	81
11.3	Form for Monthly Monitoring Report.....	89
11.4	Sample Environmental and Social Monitoring Form	91
11.5	Sample Environmental and Social Management Plan	93
11.6	Stakeholders Consultations and Engagement Activities.....	101
11.6.1	General	101
11.6.2	Hearing Session	102
11.7	Occupational Health and Safety Guidelines.....	106
11.8	E-Waste: Potential Impacts and Proposed Management	110
11.9	Sample Code of Conduct.....	112

List of Figures

Figure 1: Scheme of the Implementation Arrangement and Functional Relationships	30
Figure 2: EA administrative process, EQA Palestine.....	35
Figure 3: West Bank and Gaza (WB&G).....	44
Figure 4: Domestic Violence against Women in Palestine (2011 vs. 2019)	50
Figure 5: Digital WB&G Project main Implementation Responsibilities	69

List of Tables

Table 1: Likely impacts and suggested mitigation measures of the Digital WB&G Project	11
Table 2: Digital WB&G Project’s components, sub-components, and detailed related activities	21
Table 3: Applicability of the World Bank Standards to the Project Activities	41
Table 4: Environmental and Social Impacts Assessment by Component and Recommended Action	53
Table 5: Analysis of the Digital WB&G Project Impacts and Risks.....	59
Table 6: Impact and Mitigation Measures.....	61
Table 7: Risks, and Mitigation Opportunities	66
Table 8: Digital WB&G Monitoring, Evaluation, and Reporting Framework.....	75
Table 9: ESMF Estimated Costs and Schedules	77
Table 10: Monthly Monitoring Report	89
Table 11: Monitoring Report.....	90

List of Acronyms

BSA	Broadband Strategy Assessment
CA	Certification Authority
COVID-19	Coronavirus-19
CQCU	Complaints and Quality Control Unit of MTIT
e	Electronic
EA	Environmental Assessment
EEE	Electrical and Electronic Equipment
e-GP	e-Government Procurement
EHS	Environment, Health and Safety
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
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
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
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, to be implemented by the Ministry of Telecommunication and Information Technology (MTIT), will seek to produce concrete and tangible results for the Palestinians through (a) increase access to high-speed broadband services, (b) boost digital response, recovery and resilience from shocks, such as Coronavirus (COVID-19), and (c) increase access to selected e-government services.

To achieve the 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.

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 MTIT 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 Institutional and Implementation Arrangements

The MTIT 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 MTIT/ 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 the 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 MTIT. 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 MTIT 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**).

0.4 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.

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 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. The installation activities related to internet connections for businesses and supply of broadband infrastructure will leverage on Jerusalem District Electricity Company (JDECO)'s excess fiber optic capacity as first stage and later the excess fiber optic capacity of the other electricity distribution companies.. The installations for broadband connectivity and internet connections can have Occupational Health and Safety (OHS) risk and production of enough waste that will require waste management. .

The MTIT 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: (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 PMU employees. These impacts, in addition to possible interruption of services during project implementation and installation activities, could become a source of grievance.

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.	<ul style="list-style-type: none"> • 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 and improper disposal of e-waste may cause health and environmental impacts, as well as an unpleasant visual impact.	<ul style="list-style-type: none"> • 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.
Labor and working conditions	<ul style="list-style-type: none"> • Terms and conditions of employments are not in accordance with the requirements of national law and ESS2. • Limited risk of child labor. 	<ul style="list-style-type: none"> • MTIT will implement LMP (separate document) for mitigating the labor and working conditions, including those related to child labor. • The EHS officer at MTIT-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,

Issue	Likely Impact	Mitigation Measures
	<p>However, based on the assessment of the sector this risk is negligible.</p> <ul style="list-style-type: none"> • 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. 	<p>difficulties to the project's (Workers') GRM.</p>
Social or inequity	<p>Could arise from fairness and equity in decision making</p>	<ul style="list-style-type: none"> • 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 provision of employment	<ul style="list-style-type: none"> • Inadequate consultations with relevant stakeholders during the preparation and finalization of the project activities. • No mechanism for stakeholders to raise concerns & objections against project activities. 	<ul style="list-style-type: none"> • 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 GRM for the public (project's GRM) will be ensured to raise any concerns regarding project activities within a set time period.
Gender based Violence (GBV) and SEA/SH	<p>Exposure of youth, including vulnerable youth and women to possible GBV and SEA/SH concerns.</p>	<ul style="list-style-type: none"> • The project level GRM should include specific procedures for GBV/SEA/SH including confidential reporting and ethical documentation of relevant cases

0.5 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 ESH officer 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.

0.6 Public Consultations, Grievance and Disclosure

Public consultations are critical in preparing effective and sustainable projects. This requirement supports the participatory planning process as required by the World Bank (ESS10) and the Palestinian Authority's (PA) national regulations. It is important that beneficiaries are involved in the project cycle, from the design to implementation and monitoring. The same applies to relevant stakeholders.

With the outbreak and spread of COVID-19, people have been advised, or may be mandated by national or local law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Various restrictive measures have been taken; some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings. MTIT will conduct consultation with relevant stakeholders and affected people applying COVID-19 protocols for public consultations and stakeholder engagement.

During the preparation of the ESMF, a number of meetings were conducted either virtually or at MTIT offices in Ramallah. The attendees represent, among others, MTIT and its Complaints and Quality Control Unit (CQCU), the World Bank as the observer, the Ministry of Education (MoE), and the Consultant. Moreover, a public hearing session was conducted via Zoom, on Sunday December 13, 2020. The session targeted a group of beneficiaries and affected people by the Digital WB&G Project. Among the invitees were civil societies, JDECO, Internet Service Providers (ISP), the Palestinian Investment Fund, the Civil Defense, the police, and a group of ministries. More than 30 participants representing several ministries and institutions including the MTIT, the Ministry of Transportation (MoT), the Ministry of Health (MoH), the Ministry of Interior (Mol), the Ministry of National Economy (MoNE), Massdear Company, the Palestinian Computer Society (PCS), etc. attended the session. Project information was presented for the attendees, opinions and concerns were heard and discussed, and inquiries answered.

The main concerns discussed during the hearing session are related to the required upgrading of the systems at the institutions and the capacity building of the related employees; the security and the privacy of the information; the need to inform the people/public about the e-government and e-services; and the prioritization of the application of the project components as to cope with the development and related infrastructures at the institutions. During the upgrading it is to make sure that measures are taken to avoid any major interruptions of the digital services.

More details about the conducted meetings and the hearing session including the list of the participants are presented in **Annex 11.6**.

MTIT will be responsible for implementation of the project Grievance Redress Mechanism (GRM). It will advise people and stakeholders on their rights and GRM process throughout the period of project implementation.

MTIT will disclose on its website (<http://www.mtit.pna.ps>), 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.

0.7 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 MTIT and other involved institutions and stakeholders, mainly HCPPP. This is covered by **sections 8.3 and 8.4** of this ESMF.

The estimated cost for ESMF implementation is related to the hiring of EHS officer to support MTIT 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 still governed by the outdated telecommunication law (No. 3 of 1996) and 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 Telecom and Information Technology (MTIT). The MTIT is willing to revise the Digital Transformation Policy into development of an e-Government Strategy.

The MTIT 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); the law has yet to be approved. This results in (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 MTIT has completed a first draft of a new telecommunications law, expected to go for final review and approval at the first half of year 2021.

The ongoing global 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 the 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 the current pandemic (COVID-19) and similar future emergencies, including future climate and natural disaster events. The increasing use of the 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 will seek to produce concrete and tangible results for the Palestinians through increased access to 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 Digital WB&G Project is being prepared under the World Bank’s ESF, which came into effect on 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 MTIT 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 MTIT 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 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 damages, cumulative adverse impacts, and minimizing reversible environmental damage.

2. Project Description and Components

2.1 Project Concept

The Digital WB&G Project will seek to produce concrete and tangible results for Palestinians through (a) increased access to 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:

- % of increases broadband access through fixed fiber-optic connectivity,
- % 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 will seek to produce concrete and tangible results for the Palestinians through increased access to high-speed broadband services 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. These components are:

Component 1. (3.75 US\$ million) Enabling legal and regulatory environment for Digital Economy; mainly institutional development including the development of a Palestinian Telecommunications and Information Technology Regulatory Commission (TITRC) 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 TITRC and providing support to the MTIT and other key stakeholders in developing strategies and analytical studies, strengthening their technical capacity, and procuring of ICT equipment. These activities will strengthen the MTIT's capacity to develop sectoral strategies and monitor their implementations, strengthen TITRC's capacity to regulate and oversee the developments in the digital sector, and facilitate the emergence of digital economy.

Component 2. (5.5 US\$ 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, and (iii) the further expansion of good quality broadband connectivity through the development of fiber-optic infrastructure.

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. The high-speed broadband infrastructure coverage is to be achieved by leveraging excess fiber optic capacity from JDECO and the other electricity distribution companies.

Component 3. (8.25 US\$ 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. 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 MTIT, 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 MTIT 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
<p>Component 1: Enabling legal and regulatory environment for Digital Economy 3.75 US\$ million</p>	<ul style="list-style-type: none"> · 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 TITRC · 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.
<p>Sub-component 1.1: Strengthening development of key institutions of digital economy</p>	<ul style="list-style-type: none"> · Establishment and operationalization of the TITRC 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 TITRC, 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.
<p>Subcomponent 1.2: Development of Legal and Regulatory</p>	<ul style="list-style-type: none"> · Upgrade and development of legal and regulatory frameworks that will enable the operationalization of the TITRC and CA in the telecom sector

<p>Frameworks and Cybersecurity and Data Protection</p>	<ul style="list-style-type: none"> · 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.
<p>Subcomponent 1.3: Capacity Building</p>	<ul style="list-style-type: none"> · Capacity building for the TITRC and CA; technical training, courses, and workshops. · Technical capacity to successfully execute the regulatory and operational functions required for the effective operation of the TITRC and CA. · Build the capacity of the gender focal point at MTIT and gender inclusion in institutional development and capacity building activities. · TA activities for: <ul style="list-style-type: none"> (a) a capacity needs assessment gauging the skills and institutional capacity requirements of TITRC and CA; (b) development of institutional capacity within TITRC 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.
<p>Component 2: Implementing Digital Infrastructure Solutions for</p>	<ul style="list-style-type: none"> · 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).

<p>Emergency Response, Recovery and Resilience</p> <p>5.5 US\$ million</p>	<ul style="list-style-type: none"> · Expansion of access to broadband connectivity through sustainable MFD approach. · Further expansion of good quality broadband connectivity through the development of fiber-optic infrastructure.
<p>Subcomponent 2.1: Emergency Response Center (ERC) for Resilience</p>	<ul style="list-style-type: none"> · 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.
<p>Subcomponent 2.2: Expanding Access to Broadband Connectivity through Sustainable Maximizing Finance</p>	<ul style="list-style-type: none"> · 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 MTIT.

for Development (MFD) Approach	
<p>Subcomponent 2.3: Expand connectivity through the development of fiber optic infrastructure</p>	<ul style="list-style-type: none"> · Upgrading the existing digital infrastructure in WB&G to fiber infrastructure to meet with the upsurge in demand for bandwidths and high-capacity digital services. · Utilization of the existing JDECO distribution network in Jerusalem, Ramallah, Jericho and Bethlehem. · Introduce further competition in the telecommunications sector, particularly in the fixed market currently dominated by the incumbent operator. · Assist the PA to develop fiber optic infrastructure by encouraging the utilization of fiber over the grid and to leverage JDECO's excess fiber optic capacity with the private sector. · Feasibility study and PPP transaction advisory consultancy to identify the optimal investment strategy based on projected availability of infrastructure sharing, business models, cost and overall impact. · Support a competitive tender for fiber infrastructure deployment under a PPP; and · Support a monitoring service levels/performance of the private sector partner under the proposed project.
<p>Component 3: Fostering User Centered E-Service Delivery 8.25 US\$ million</p>	<ul style="list-style-type: none"> · 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.
<p>Subcomponent 3.1: Enabling environment for accelerated development of E-services.</p>	<ul style="list-style-type: none"> · Develop the strategy and enabling environment for e-government services. · Undertake necessary technical and feasibility studies for the MTIT 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.

	<ul style="list-style-type: none"> · 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.
<p>Subcomponent 3.2: Delivering user-centric e-Services.</p>	<ul style="list-style-type: none"> · 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.
<p>Subcomponent 3.3: Development and implementation of priority e-government procurement (e-GP) functionalities in</p>	<ul style="list-style-type: none"> · 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,

targeted high-spending agencies	<p>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.</p> <ul style="list-style-type: none"> · 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.
<p>Component 4: Project Management and Implementation Support</p> <p>2.5 US\$ million</p>	<ul style="list-style-type: none"> · Creation of a dedicated PMIU in the MTIT 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 MTIT 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 MTIT 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.
<p>Component 5 – Contingent Emergency Response Component</p>	<ul style="list-style-type: none"> · 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

0.0 US\$	(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 capacity building activities necessary to operate them. This will empower them to carry out their functions in a more effective and transparent manner.

The MTIT will be a direct beneficiary of the project in terms of strengthened institutional and technical capacity. Private sector telecom companies, ISPs and individual digital entrepreneurs will benefit from the establishment of an open-access national fiber optic backbone leveraging JDECO's excess capacity and an improved business environment due to the enabling legal and regulatory environment.

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 MTIT. PMIU will be established to coordinate the project implementation and reporting.

The MTIT 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 MTIT 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 will be staffed accordingly and will report to the PC. It is already staffed with four officers; the unit head, procurement expert, the financial and administrative expert and IT engineer. Another 4; the EHS officer, procurement assistant, evaluation and supervision officers are foreseen to be appointed after project effectiveness.

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 the 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, JDECO and Internet Service Providers (ISP), who are to be involved by the project components will be coordinated by the MTIT. 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 a responsibility of the MTIT.

Among the other overall management and monitoring required by the PMIU at the MTIT 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. MTIT 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.

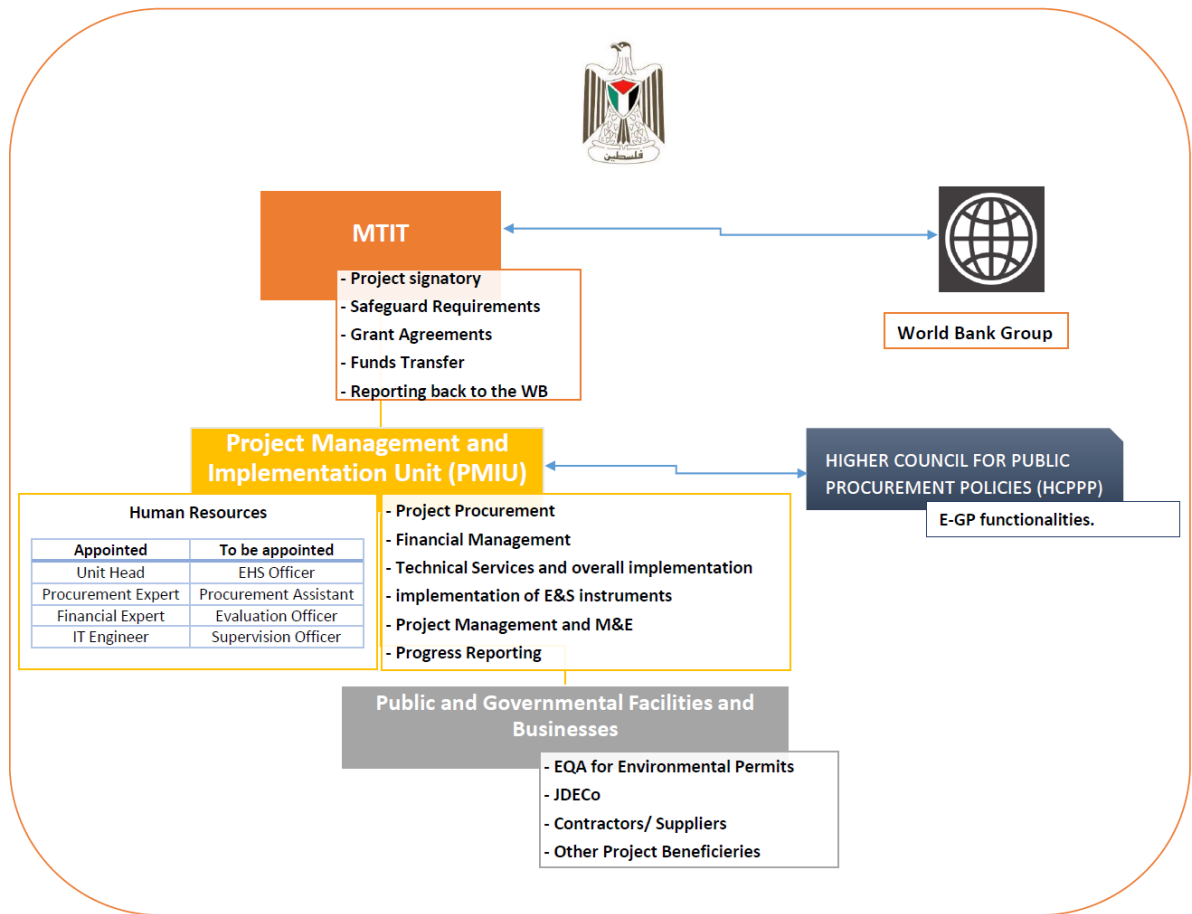


Figure 1: Scheme of the Implementation Arrangement and Functional Relationships

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 MTIT 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 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 with 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 MTIT 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 much 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 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.

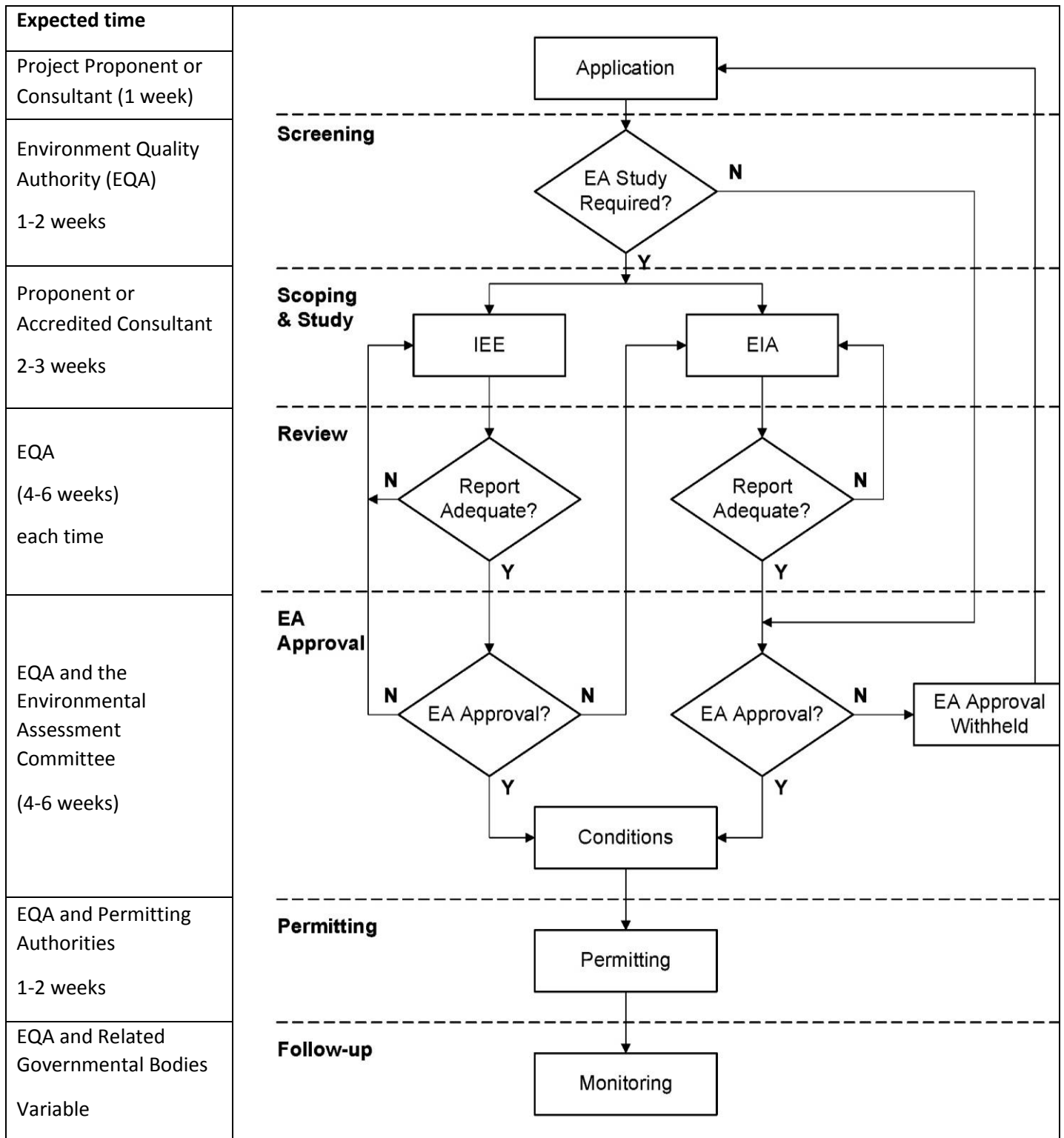


Figure 2: EA administrative process, EQA Palestine

Total (12-18) weeks

3.2.4 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.

3.2.5 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 the Palestine. Being the central representative authoritative body responsible for all environmental issues in the Palestine, EQA addresses all environmental constraints, including natural resource depletion and environmental pollution, as an approach towards sustainable development.

3.3.1 Palestine's COVID-19 Response Plan

The PA immediately declared a State of Emergency when the first cases in the State of Palestine were diagnosed on 5 March 2020 and launched robust national containment measures, supported by an evidence-based communications campaign to encourage the citizens to protect themselves and follow government guidance.

The purpose of the Response Plan is to:

- Present the PA's strategy and actions;
- Propose an aid coordination approach;
- Identify the critical support needs, including for: public health response to COVID-19; budget support to maintain government services; and diplomatic engagement with regional partners; and
- Describe the expectations of the longer-term economic impact of COVID-19 and required economic recovery actions.

The PA approach of COVID-19 focuses on preparation, containment and communication. For that, an Emergency Command Center was established in the Prime Minister's Office, supported by inter-ministerial and multilateral emergency committees and regional committees.

3.3.2 EQA Guideline for Measures to Preserve Public Health, the Environment, and Solid Waste Management to Limit the Outbreak of the New Corona Virus

EQA, in parallel with the national efforts exerted to besiege Corona Virus, issued several instructions related to solid waste handling and management. It began by issuing instructions to manage infectious waste in emergency situations on March 10, 2020. This was followed by issuing technical instructions related to the process of collecting and transporting infectious waste inside the quarantine and isolation centers on March 19, 2020, then the last of these issues was the guideline for measures to preserve public health, the environment, and solid waste management to limit the outbreak of the new Corona virus on April 05, 2020.

This guide stems from the fact that dealing with hazardous solid waste may involve many risks; related to the transmission of infection, especially with regard to workers who carry out the collection, transportation and disposal of these wastes, which requires clarification of the procedures and directives required to be followed by them to reduce the chances of infection and maintain their safety.

On the other hand, and due to the presence of large numbers of citizens being subject to home quarantine, the household waste generated in population centers as a whole has called attention to the possibility of its containment with the causes of the spread of the epidemic, which confirms the need to take the necessary preventive measures that came in this Guide.

3.3.3 Information and Communication Technology Regulatory Framework

The telecom sector is still governed by the outdated Telecommunications Law No. 3 of 1996 and no digital economy strategy exists to clarify the vision of the PA in the sector. The Ministry of Telecommunications and Information Technology (MTIT) has been engaged since 2005 in drafting a legal and regulatory framework aligned with international best practice, including the establishment of the independent Palestinian Telecommunication and Information Technology Regulatory Commission (TITRC). Yet, political instability hindered the MTIT's plans to have the TITRC up and running by the end of 2010.

Ten years later, the law has yet to be approved. This results in:

- (i) A lack of responsiveness in addressing sector-specific technical and legal issues;
- (ii) A negative impact on the transparency of the licensing process, which has left telecom operators dissatisfied; and
- (iii) An absence of regulation vis-à-vis Paltel's dominant market position in both fixed and mobile broadband segments and therefore negative impact on consumers in terms of prices and quality of service.

More recently, the MTIT has completed a first draft of a new telecommunications law. It is expected that the new law could go for final review and approval by the end of 2021.

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 MTIT is working on filling the gaps on 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 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 TITRC and providing support to the MTIT 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 TITRC'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 and hardware and software related to the delivery of e-government services and platforms.

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 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	<p><i>Environmental and Social Assessment and Management</i></p> <p>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 ensures 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; and (iv) OHS risks during installation activities. 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. 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.</p>
ESS2	<p><i>Labor and Working Conditions</i> This standard is relevant to the project, given that the project will hire direct and indirect workers that will be engaged by the PMIU/MTIT to work specifically in relation to the project.</p> <p>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 COVID-19 infection, especially if proper hygiene, safety precautions and social distancing measures are not adhered to.</p> <p>Labor and working conditions: The project will involve civil servants working at the MTIT 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.</p>

	<p>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.</p> <p>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.</p>
ESS3	<p><i>Resource Efficiency and Pollution Prevention and Management</i></p> <p>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 and hardware and software related to the delivery of e-government services and platforms. The environmental impacts associated with the installation of this equipment is related to the 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.</p>
ESS4	<p><i>Community Health and Safety</i></p> <p>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.</p> <p>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.</p>
ESS5	<p><i>Land Acquisitions, Restrictions on Land Use and Involuntary Resettlement</i></p> <p>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.</p>
ESS6	<p><i>Biodiversity Conservation and Sustainable Management of Living Natural Resources</i> 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.</p>

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 km² 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 on an area of 365 km², 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.

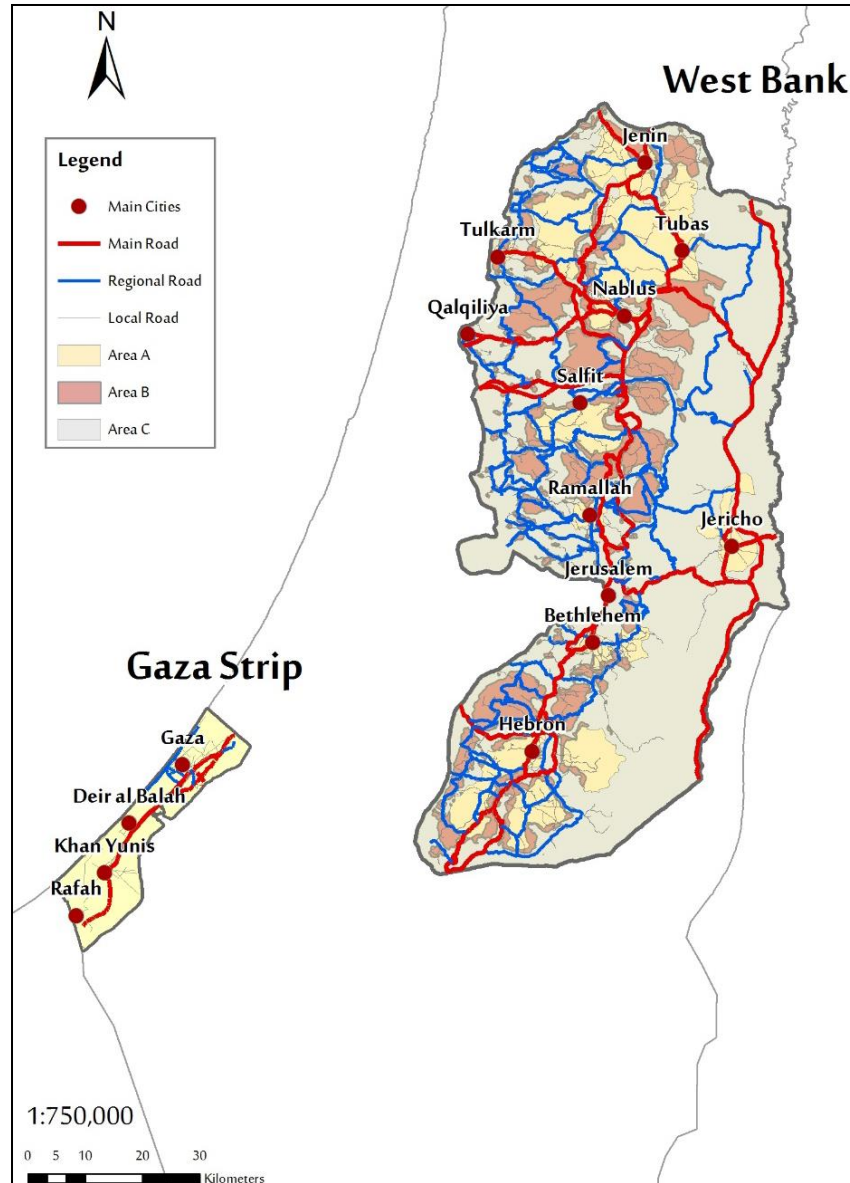


Figure 3: West Bank and Gaza (WB&G)

4.2 Socio-Economic Context

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, 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 World 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 expenditures and reallocate away from its previous plans to help meet the financing demands. However, even with a significant reallocation of expenditures 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. 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. In 2019, 71.1% of the population in WB&G were using the internet, a 10% increase from 2018 from 64.4%, despite the unique mobile-broadband user penetration rate of merely 9.28% as of 2020.

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.

The mobile broadband market is slightly more competitive than the fixed broadband market, with the two Palestinian operators Jawwal (PaTel's subsidiary) and Ooredoo Palestine (former Wataniya Mobile Palestine). By mid of 2020, the total mobile connections passed 86%, and the market penetration of 2G connections stood at 70.1% while 3G connections reached 16.03%, with the clear trend of the users transitioning from 2G to 3G where available. The WB&G are following the regional trend to adopt mobile broadband services and connections through Wi-Fi hotspots, given the general lack of fixed broadband infrastructure.

The Palestinian operators also face import and construction restrictions and unfair market competition from Israeli operators, who can offer 3G and 4G services and have an estimated 20% mobile broadband market share in the West Bank.

Fixed broadband access is available through Digital subscriber line technology, installed by PaTel, which has a monopoly over fixed-line telecommunications service provision, over the existing copper local loop. PaTel provides internet services both directly and via a subsidiary Internet Service Provider (ISP), Hadara, while it also resells its services to private ISPs. However, the wholesale fixed broadband market is subject to many restrictions that are stifling competition and innovation.

The wholesale fixed broadband market is also subject to many restrictions that are stifling competition and innovation. The Bit-stream Service Access (BSA), introduced by the MTIT in 2010 and offered by PaTel, limits the commercial and technical freedom of ISPs as end-users are required to subscribe to PaTel's before subscribing to an ISP to access the Internet due to the absence of the Local Loop

Unbundling regulation. Furthermore, under the current BSA offering, ISPs are not able to provide broadband services to corporate customers.

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 Maqdam 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 population living nearby. Different types of e-waste bring different degrees of damages. 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 on 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

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**.

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.

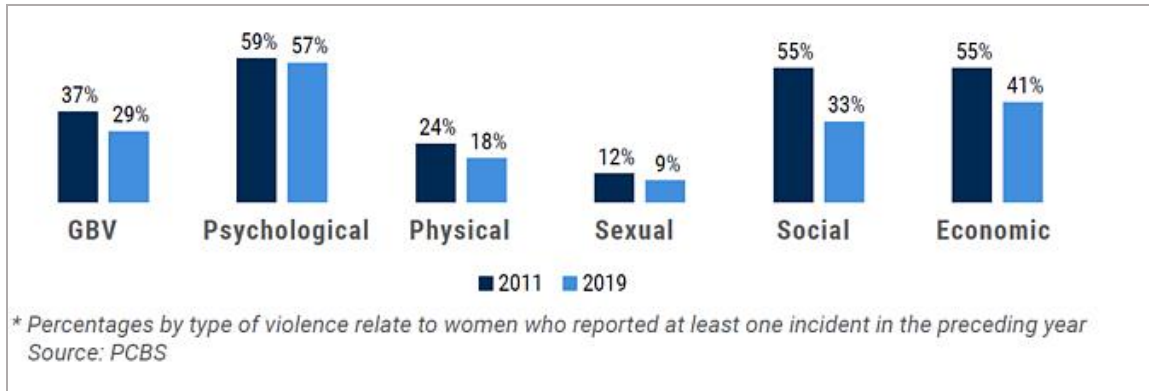


Figure 4: Domestic Violence against Women in Palestine (2011 vs. 2019)

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 and the e-government services and platforms. 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; and (iv) 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: (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. Even though there are some small-scale works that will be carried out during the expansion of IT equipment, the scale of works will be only determined during implementation. Nonetheless, all the activities related to the installation of the equipment will be done within the existing structures. There is no impact on livelihoods, only temporary disturbances of access to some of the buildings adjacent to the installation sites that if occurs will be adequately mitigated. (covered in table 1 and section on ESS5)

These impacts in addition to possible interruption of services during project implementation and installation activities, could become a source of grievance.

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 COVID-19 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	<ul style="list-style-type: none"> Establishment and operation of TITRC; Establishment of CA; Purchase of Equipment, hardware and software solutions. 	This subcomponent will generate minor negative environmental impacts.	This subcomponent represents low risks	Implement the SEP
	Sub-component 1.2: Development of Legal and Regulatory Frameworks and Cybersecurity and Data Protection.	<ul style="list-style-type: none"> 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 TITRC 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	<ul style="list-style-type: none"> Provide capacity-building opportunities for sector employees; as training, workshops, etc. 	This subcomponent will not generate impacts.	This subcomponent represents low risks.	Implement the SEP.
Component 2: Digital Infrastructure Solutions for Emergency Response, Recovery and Resilience	Sub-component 2.1: Emergency Response Center (ERC) for Resilience.	<ul style="list-style-type: none"> Preparation of an Emergency Management Framework and Action Plan; Development of laws and regulations for personal data protection standards and data exchange protocols; 	This subcomponent will generate moderate environmental impacts. Waste generation in particular, e-waste from the	This subcomponent represents moderate risks/ social exclusion patterns and unfair utilization or access to project benefits.	Implement the SEP. Prepare and Implement OHS plan using the Ministry of Health and WHO guidelines regarding protection measures

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
		<ul style="list-style-type: none"> • 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. 	procurement and installation of communication equipment and software. The activities will entail OHS risks including risk to COVID-19 pandemic, noise, etc.		from Covid-19 epidemic disease -waste management plan (EWMP) Implement LMP
	Sub-component 2.2: Expanding Access to Broadband Connectivity through MFD approach.	<ul style="list-style-type: none"> • Purchase of broadband services in collaboration with telecom operators and ISPs. 	This subcomponent will generate moderate negative environmental impacts. Waste generation, in particular, e-waste from broadband connectivity. Moderate negative environmental impacts are anticipated from equipping the targeted beneficiaries and institutions (OHS impacts including risk to COVID-19 pandemic, noise, etc.).	This subcomponent represents moderate risks. Temporarily disrupt businesses, and other targeted 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 the SEP. Prepare and Implement OHS plan with protective measures for COVID-19 and EWMP. Implement LMP

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
	Sub-component 2.3: Development of fiber optic infrastructure.	<ul style="list-style-type: none"> • Upgrade the existing digital infrastructure to fiber optic infrastructure. • Leverage JDECO’s excess fiber optic capacity with the private sector. • Feasibility study and PPP transaction advisory consultancy. • Support competitive tenders and monitoring services for fiber optic infrastructure and private sector partners, respectively. 	This subcomponent will generate low to moderate environmental impacts. Waste generation, in particular e-waste from the upgrading of the fiber optic infrastructure.	This subcomponent represents moderate risks/ social exclusion to project benefits, such as access to broadband services, internet connectivity, e-services /Temporarily disrupt businesses, and other targeted facilities during installation activities. / Risks related to labor and working conditions.	Implement the SEP. Prepare and Implement OHS plan with protective measures for COVID-19, and EWMP. Implement LMP
Component 3: Fostering User Centered E-Service Delivery	Sub-component 3.1: Enabling environment for accelerated development of e-services.	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Purchase of equipment, software and licenses. 	This subcomponent represents Low risks/ will generate low to	This subcomponent represents moderate risks/	Implement the SEP.

Component	Sub-Component	Activity	Environmental Impact Assessment	Social Impact Assessment	Recommended Action
	user-centric e-Services	<ul style="list-style-type: none"> Expansion of the MTIT’s forthcoming private cloud. 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. 	moderate impacts. Some activities could include expansion of existing data centers, equipment installation and internal works in existing facilities. Waste generation in particular, e-waste	development priorities further exacerbate existing exclusion patterns.	Prepare and Implement OHS plan with protective measures for COVID-19 and EWMP Implement LMP
	Sub-component 3.3: Development and implementation of priority e-government procurement (e-GP) functionalities	<ul style="list-style-type: none"> 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 Implementation Support		<ul style="list-style-type: none"> The creation of a dedicated PMIU in the MTIT and associated activities; Support project management issues; 	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
		<ul style="list-style-type: none"> Capacity building for the MTIT staff. 		governance structure, and risks identified in the LMP	
Component 5: Contingent Emergency Response Component		<ul style="list-style-type: none"> The crisis response expenditures could cover, for instance, the facilitation of emergenc; 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.

5.2 Environmental and Social Impact Assessment

5.2.1 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 system 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;
 - 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.

5.2.2 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	

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.

5.2.3 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 MTIT
Noise (Vibration and noise nuisance)	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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. • Wastes 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).

<p>E-waste</p>	<ul style="list-style-type: none"> • 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.
<p>Occupational Health and Safety (OHS)</p>	<p>Implement mitigation measures in LMP including but not limited to:</p> <ul style="list-style-type: none"> • 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 MTIT and the PMIU, in timely manner. • Commitment to the Ministry of Health and WHO guidelines regarding protection measures from COVID-19 pandemic; • 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 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	<ul style="list-style-type: none"> • The MTIT will implement LMP (separate document) for mitigating the labor and working conditions. • The EHS officer at the MTIT-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.
Interruption of services during installation activities	<ul style="list-style-type: none"> • 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	<p>Implement the SEP including:</p> <ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Include specific procedures for GBV within the project's level GRM, such as confidential reporting and ethical documentation of GBV cases as described in the SEP. • Adopt and implement the Code of Conduct throughout project implementation (Annex 11.9).
Inadequate consultations with relevant stakeholders	<ul style="list-style-type: none"> • 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.

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 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 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 insulation 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 signs	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 include 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 COVID-19	Apply OHS requirements for contractors including commitment to the Ministry of Health and WHO guidelines regarding protection measures from COVID-19 epidemic disease including but not limited to: social distancing between workers, in the event of an outbreak, an emergency response plan is in place and project-related staff and contractors are provided with training to implement the plan
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)**.

If, through the use of “**Form A. Sub-Projects Screening Procedures**” the subproject analyzed is found to have no impacts on the environment and social aspects, no further action will be required. However, if impacts are identified, whether they may be mitigated or not, the sub-project screening results are to be brought to the attention of the PMIU.

Depending on the results of the completed checklist, the EHS officer of the PMIU will guide the subproject level project to either complete a Simple Environmental and Social Assessment (**Form B**) or a Limited Environmental Social Assessment (**Form C**) presented in Annex 11.2. Limited EA applies if the sub-project may create minor environmental and social problems that require frequent monitoring or sub-project design modifications to minimize or eliminate the impacts. 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 EHS officer 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 MTIT/ 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.

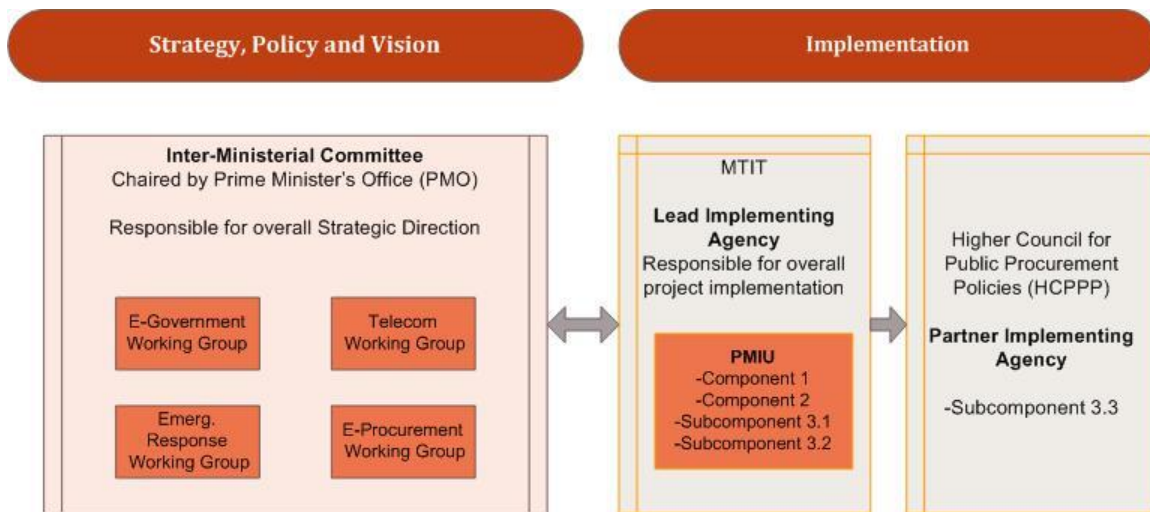


Figure 5: Digital WB&G Project main Implementation Responsibilities

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 MTIT, is to manage the ESMP and its defined mitigation measures during the operation of the project.

9. Stakeholder Engagement, Public Consultations and Disclosure

9.1 Consultation and Disclosure

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.

For sub-project activities, the first step is to hold preliminary consultations with the “upstream” stakeholders during the design process of the project’s activities. .

As part of the activities related to the preparation of this ESMF and SEP a number of meetings were held. One meeting was held with those involved in the project preparation and the second one with the wider range of stakeholders.

- The MTIT and the project’s team have been engaging with various project stakeholders as part of the preparation of this project. The activities have targeted the potential key stakeholders who may be involved in the project. The stakeholder engagement activities that took place as part of the preparation of the project included preliminary meeting with different stakeholders on August 17, 2020. The meeting included stakeholders from different institutions such as the Ministry of Interior (Mol), the Public Prosecution Office, the Civil Defense, the Police and the Ambulance services in hospitals and health NGOs. Participants discussed the project’s component that is related to the Emergency Response Center. Another meeting was conducted on October 18, 2020 . Participants from different institutions such as Paltel, Ooredoo, several ISPs (Mada, Call you, Cool Net, etc.), the Union of Local Authorities, Radio Ajyal and the Jerusalem District Electricity Company, attended the meeting. Participants were informed about the project’s objective and activities. Participants also discussed the draft telecommunication law.

- A public consultation session was conducted virtually, on Sunday December 13, 2020. Project’s affected parties included thirty (30) representatives of civil society organizations, Jerusalem District Electricity Company (JDECO), private sector Service Providers, the Palestinian Investment Fund, the Civil Defense, the Police, the Prosecution, and relevant ministries, including the MTIT, the Ministry of Transportation (MoT), the Ministry of Health (MoH), the Ministry of Interior (Mol), the Ministry of Education (MoE) and the Palestinian Computer Society (PCS). During the public consultation meeting, participants expressed their concerns regarding the following:
 - (i) the need to upgrade the systems used by the different government offices and buildings and private sector companies and the capacity building of the related employees;
 - (ii) information security and privacy;

- (iii) disclosure of information and public awareness on e-government and e-services, especially the e-permits/licenses and e-payment;
- (iv) the prioritization of the application of project components as to cope with the development and related infrastructures at the institutions giving the e-payment the highest priority.

In addition to the above, the participants stressed the importance of fair access to the services and the information security. During the upgrading, the MTIT needs to ensure that measures are taken to avoid any major interruptions of the digital services. More details on stakeholder engagement and public consultation meeting are presented in Annex (11.6)

To fulfill the requirements of ESS10, the MTIT has prepared Stakeholder Engagement Plan (SEP). The purpose of SEP is to explain how Stakeholder engagement will be practiced throughout the project life cycle and which methods will be used as part of the process; as well as to outline the responsibilities of the MTIT in the implementation of stakeholder engagement activities. The SEP prepared supports clear communication and meaningful consultation, 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”¹. The SEP identified the stakeholder categories and affected parties in relation to activities related to the project. The SEP will be updated based on the prepared SEP as soon as the specific project component/sub-projects, stakeholder groups, and schedule of activities are known.

The MTIT will disclose on its websites; MoL website: (<http://www.mtit.pna.ps>), project information and all key documentation, including ESMF, LMP and SEF to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The information will be disclosed in English and Arabic language, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, women, mobility, accessibility).

The disclosure should include information on: (i) stakeholder engagement process, highlighting the ways in which stakeholders can participate; (ii) time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported and; (iii) the process and means by which grievances can be raised and will be addressed.

Grievance Redress and Complaints 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 GRM

1

https://biwta.portal.gov.bd/sites/default/files/files/biwta.portal.gov.bd/page/f3ca1ff6_95b0_4606_849f_2c0844e455bc/2020-10-01-11-04-717aa8e02835a7e778b2fff46f531a8c.pdf

system. Currently, the existing CQCU at the MTIT 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 EHS officer 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 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 MTIT, 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 MTIT shall be responsible for monitoring and supervising the GM procedure. Thus, ensuring that implementation/operation activities are carried out in compliance with the project's requirements, contractual terms and the requirements and procedures set forth by the relevant Environmental and Social Management documents prepared for this project.

The MTIT shall ensure that any potential health, safety, environmental hazards and social concerns, in addition to GBV concerns related to the Digital WB&G Project are monitored and properly addressed. During the implementation phase, the contractors/suppliers and their workers are responsible to comply with the requirements, including the GBV policy and implement all measures needed for stakeholder engagement and grievance resolution. Same issue goes for the operator during operation and O&M phases.

The Community Grievance Mechanism and Workers Grievance Mechanism are covered in detail in the SEP and the LMP, prepared for the Project.

9.2 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

10.1 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 MTIT, 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 trainings, 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.

10.2 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 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 MTIT 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 MTIT.
Quarterly Progress Report (QPR)	PMIU to MTIT, From MTIT to World Bank	The PMIU will submit the report to the MTIT, and the MTIT 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.

10.3 Capacity Building and Good Practices

The successful approach to standards implemented under the Digital WB&G Project will be maintained. The employees at MTIT 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 ensue 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 MTIT 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 MTIT 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 MTIT, 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 MTIT and EQA. Sharing of 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.

10.4 Capacity building requirements for Implementation of ESF

Even though the MTIT 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 are already appointed by the MTIT 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.

10.5 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

Bibliography

A strong spatial association between e-waste burn sites and childhood lymphoma in the West Bank, Palestine, Davis et al., 2018.

Digital West Bank and Gaza Project (P174355) Terms of Reference, MTIT, October 2020.

Guideline for Measures to Preserve Public Health, the Environment, and Solid Waste Management to Limit the Outbreak of the New Corona Virus, EQA, April 2020.

In Depth Study of the Waste from Electrical and Electronic Equipment Recycling Market- Final Report, ENFRA Consultants, 2018.

Project Concept Note (PCN), World Bank, September 2020.

Palestine's COVID-19 Response Plan, GoP, March 2020.

Promotion of sustainable growth in Palestine through an environmentally safe, innovative and economically valuable treatment of WEEE (Waste from Electrical and Electronic Equipment), Arcobaleno, 2018.

Special Rapporteur Report on violence against women, its causes and consequences, Mission to Occupied Palestinian Territory, United Nations, 2005.

Status of the Environment in the State of Palestine, ARIJ, 2015.

Team Europe digital response strategy in Palestine and AAP 2022 Programming, EU, October 2020.

Technical Note: Public Consultations and Stakeholder Engagement in WB- supported operations when there are constraints on conducting public meetings, WBG, March 2020.

The Telecommunications Sector in the Palestinian Territories: a missed opportunity for economic development, World Bank, January 2016.

Violence Survey, PCBS, 2011 and 2019.

<https://publicadministration.un.org/egovkb/en-us/Reports/UN-E-Government-Survey-2020>.

<https://www.who.int/health-cluster/countries/occupied-palestinian-territory/occupied-palestinian-territory-covid-19-humanitarian-response-plan-april-2020.pdf?ua=1>

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 Forms

Form A. Screening Procedures

Section A: General Criteria

1. Name of subproject:

2. Country:

3. Contractor information:

4. Name:

5. Address and email:

6. Information of the responsible for the screening process and filling the form

7. Name:

8. Academic degree/Profession:

9. Phone number

10. Email:

11. Date:

12. Signature:

Section B: Environmental and Social Description and Preliminary Assessment of Situation and Potential Environmental and Social Impacts

Description of Project site location: include coordinates and maps

Description of the natural surroundings and settings

Description of the social surroundings and settings, (i.e. urban/ rural, violence, population density, Income level, etc.)

1. Pollution and Contamination Risks

Description	Yes	No	Not Known
Is there a possibility of pollution or contamination risks by discharges from latrines, industrial and dump sites, etc.?			

2. Geology

Description	Yes	No	Not Known
Is there a possibility of soil instability and erosion?			
Is there a possibility of saltwater intrusion?			
Is there a possibility of flooding or interrupting natural drainages and or surface runoff?			

3. Soil Erosion

Description	Yes	No	Not Known
Could the Project activities affect soil erosion processes? Could the Project activities create indirect activities that could promote soil erosion processes?			
Will the Project modify slopes?			
Could the Project activities create processes that could modify slopes?			
In the event the project activities promote or creates activities that could lead to install infrastructures or activities in areas with slopes. In those instable slopes, is there a probability for danger?			
Would it be a need for consultation of a geology expert?			

4. Water: Quality and Quantity

Description	Yes	No	Not Known
Is there any Surface waters or runoff evidence nearby the project implementation site?			
Will the Project increase the use and demand of freshwater resources?			
Will the Project generate or discharge waste liquid substances into natural surface waters, or swamps?			
Would the project produce negative impacts on the nearby surface waters?			
Would it be a need for consultation of a water expert?			

5. Groundwater: Quality and Quantity

Description	Yes	No	Not known
Is there an exploitable groundwater resource by the project?			
Will the Project increase the groundwater uses?			
Will the Project discharge wastewater or any other liquid wastes into the ground water and aquifer?			
Could the Project deteriorate or alter the groundwater?			
Would it be a need for consultation of a hydrological expert?			

6. Energy Source

Description	Yes	No	Not Known
Will the project increase the demand for energy consumption?			
Will the project create a demand for a different source of energy?			
Will the Project create a demand for different type of energy sources? if yes define type:			

7. Uses of Natural Resources

Description	Yes	No	Not Known
Would the Project require and use considerable quantities of natural resources? (i.e. installation of materials, water, soils, sand, gravels)?			

8. Maintenance and Upgrades (working conditions)

Description	Yes	No	Not known
Will the Project need frequent maintenance and upgrades during its operation?			

9. Labor

Description	Yes	No	Not known
Will the Project increase employment opportunities?			
Will the Project eliminate job opportunities in the project area?			
Will the project increase income and means of sustenance?			
Will the project diminish income and means of sustenance?			

10. Population: Risks and Impacts

Description	Yes	No	Not known
Would the adverse and negative risks and impacts be evenly distributed amongst the area of influence of the project			

11. Indigenous Peoples/ Local Traditional Communities and Sub-Saharan

Description	Yes	No	Not known
Is the Project located or any of its activities are in land, or spaces where is a presence of communities as described in the ESS7 of the World Bank?			

12. Cultural Heritage

Description	Yes	No	Not known
Will the Project activities affect or be constructed in or within a patrimonial heritage site?			

13. Land acquisition

Description	Yes	No	Not known
Is there a need of an involuntary land acquisition, home resettlement, loss of income or access that could be related to a reduction of quality of life to people nearby or in the Project influenced areas?			

14. GBV/SEA/SH

Description	Yes	No	Not known
Does the project area present considerable GBV/SEA/SH risk?			

Part C: Conclusion/ Next Actions

Summary	More Requirements/ Next Action
If all answers were No	No actions needed
If there were at least one YES	Proceed to a Simple Environmental and Social Revision (Form B); or a Limited Environmental and Social Revision (Form C). For Projects that include infrastructures activities, complete Form B: List of Environmental and Social Verification

Recommended Actions:

- No actions are recommended if there are no impacts identified. Only a Simple Environmental Review (SER), will be performed if there are easily mitigatable impacts that could potentially create low level affectation.
- Limited Environmental Revision (LER) would be required if the subproject could create minor and low-level impacts, that could be avoided by changing in the project design and engineering.
- Any other recommendation (please explain)

This form has been completed by: Name: _____ Title: _____ date: _____	Approved by the project manager name: _____ title: _____ date: _____
--	---

signed: _____	signed: _____
---------------	---------------

Form B

Simple Environmental and Social Assessment

Expected Impacts	Impact Description	Proposed Mitigation Measures
Physical Media		
Increased soil erosion		
Increased sediment loads (discharged)		
Potential water pollution and/or contamination		
Dust and noise generated during installation activities		
Biological/Environment		
Removal or affectation of vegetation and or fauna		
Project location inside, in buffer area or near a protected area or special management area		
Affectation or removal of habitats		
Social		
Affectation or removal of a heritage site or infrastructures		
Indigenous Peoples/Local Traditional Communities		
Violent population and communities		
Aesthetical degradation of landscapes		
Risk to human's health and Environs by transport of dangerous or toxic materials and substances		

This form has been completed by: name: _____ title: _____ date: _____ signed: _____	Approved by the project manager name: _____ title: _____ date: _____ signed: _____
---	--

Form C

Limited Environmental and Social Assessment

Name of subproject:

Location:

Subproject type:

Numbers of persons the subproject benefits

General description of the subproject

Subproject objectives

Subproject components

Base line description of the subproject affected areas and its environs.

Physical Settings description (physical and chemical characterization of the area where the subproject will be installed)

Biological and natural settings description (habitats characterization of the area where the subproject will be installed)

Social and economic description (land tenure, vulnerable groups, public health, demographics and infrastructures characterization of the area where the subproject will be installed)

Identification of Negative Environmental Impacts

Impacts in the Physical and Chemical surroundings

Impacts in the Biological and Natural surroundings

Impacts in the Social and Economical setting

Mitigation Measures

Impact description

Mitigation Measures Description

<p>This form has been completed by:</p> <p>name: _____</p> <p>title: _____</p> <p>date: _____</p> <p>signed: _____</p>	<p>Approved by the project manager.</p> <p>name: _____</p> <p>title: _____</p> <p>date: _____</p> <p>signed: _____</p>
--	--

11.3 Form for Monthly Monitoring Report

Table 10: Monthly Monitoring Report

No.	<u>Mitigation measure</u>	<u>Dates of monitoring Inspections</u>	<u>Status of compliance</u>	<u>Corrective actions needed</u>

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 depends 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;

viii. 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:

.....
.....
.....

<p><u>Assessed/prepared by</u></p> <p>Name: _____</p> <p>Title: _____</p> <p>Date: _____</p>	<p><u>Reviewed and corrected by</u></p> <p>Name: _____</p> <p>Environment, Health and Social Officer</p> <p>Date: _____</p>
--	---

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.	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> - 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)	<ul style="list-style-type: none"> • installation activities will occur within specified daylight hours. • Temporary noise barriers will be installed at site to minimize harmful noise levels. 	Contractor	<ul style="list-style-type: none"> - Existence of noise barriers and suppression systems; - Ensure that mitigation measures are incorporated into bid documents; 	Contractor, PMIU.

		<ul style="list-style-type: none"> • 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 manufacture will be utilized. • Ensure all vehicles and equipment are properly serviced. 			
<p>Waste</p>	<p>Poor management, compilation and improper disposal of waste may cause environmental and visual impacts.</p>	<ul style="list-style-type: none"> • 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 from the installation activities. 	<p>Contractor</p>	<p>Ensure that mitigation measures are incorporated into bid documents.</p>	<p>Contractor, PMIU, EQA.</p>

		<ul style="list-style-type: none"> • Wastes 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.	<ul style="list-style-type: none"> • 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 	Contractor	Ensure that mitigation measures are incorporated into bid documents.	Contractor, PMIU, EQA.

		<p>processing operations located in the region.</p> <ul style="list-style-type: none"> • 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. 			
<p>Occupational Health and Safety; including risk of COVID-19</p>	<p>Injuries during working with tools.</p>	<ul style="list-style-type: none"> • Develop and implement OHS and Environmental Guidelines for beneficiaries including among others: <ul style="list-style-type: none"> - Provide training for workers - Respect all safety measures required for operation work - Provide workers with protective personal equipment (PPEs) - Prepare an Emergency Response Plan (ERP) 	<p>Contractor</p>	<ul style="list-style-type: none"> - Contractor will provide safety training and inspection; - All accidents will be reported; - Unsafe conditions will be corrected; - Agency review of emergency response plan. 	<p>Contractor, PMIU, MoL, MoH.</p>

		<ul style="list-style-type: none"> • Develop and implement grievance mechanism for workers • Apply OHS Requirements including commitment to the Ministry of Health and WHO guidelines regarding protection measures from COVID-19 pandemic. 			
Labor and working conditions	<ul style="list-style-type: none"> • Terms and conditions of employments 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. 	<ul style="list-style-type: none"> • 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, MTIT, Contractor.	- Review Terms and Conditions of Employments	Contractor, PMIU, MoL.

<p>Social exclusion or inequity</p>	<ul style="list-style-type: none"> • Could arise from lack of fairness and equity in decision-making. 	<ul style="list-style-type: none"> • 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. 	<p>MTIT, PMIU, Contractor.</p>	<ul style="list-style-type: none"> - Existence of criteria for selecting beneficiaries; - Existence and activation of GRM. 	<p>PMIU, MoSD, MoL.</p>
<p>GBV and SEA/SH</p>	<ul style="list-style-type: none"> • Exposure of youth, including vulnerable youth and women to possible GBV and SEA/SH concerns 	<ul style="list-style-type: none"> • The project level GRM should include specific procedures for GBV/SEA/SH including confidential reporting and ethical documentation of relevant cases. 	<p>PMIU, Contractor</p>	<ul style="list-style-type: none"> - Documentation and reporting of any incident. 	<p>PMIU, Police, MoWA, MoSD.</p>

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 Stakeholders Consultations and Engagement Activities

11.6.1 General

As part of the activities related to the preparation of this ESMF and SEP, the following meetings took place:

1. On Monday 2, November 2020 a meeting was conducted at the MTIT between 10-12 am. In addition to the Consultant, the meeting was attended by:
 - Eng. Samer Ali, Project Coordinator, MTIT
 - Eng. Shorouq Khateeb, Focal point, MTIT
 - Ms. Rajaa Issa, Administrative Assistant, MTIT
 - Mr. Rami Rabah, Private Sector Consultant, WB
2. On Wednesday November 11, 2020, a virtual meeting took place. The meeting was attended by more than 15 participants representing the MTIT, Ministry of Education (MoE), Ministry of Higher Education and Scientific Research (MHESR), who are the three main Palestinian Ministries that are involved and benefiting the Project components. The Digital WB&G Project coordinator (Eng. Samer), who is the General Director of the Telecommunication Directorate and the E&S focal point (Eng. Shuroq) were among the MTIT representatives. The meeting discussed several points related to the project components and activities; the potential E&S impacts and risks. It also concentrated on identifying the project stakeholders and beneficiaries.
3. On Wednesday November 18, 2020, a third meeting was conducted at MTIT and was attended by the Complains and Quality Control Unit (CQCU). The meeting was mainly to get a full picture of the current GM at the MTIT and also to identify the stakeholder engagement activities that took place already.
4. On Monday November 30, 2020, a fourth meeting was conducted at MTIT and attended by representatives from MTIT and the World Bank, as well as the Consultant. The meeting discussed the SEP and its requirements, in addition to the developed Project Informing Sheet. By the end of the meeting, it was agreed that the MTIT will study the possibility of conducting a hearing session physically or virtually and plan it during the coming two weeks.

It is important to note that MTIT has initiated consultations with different relevant stakeholders. MTIT has requested these stakeholders to provide their opinion about the project, based on sharing brief about the project and asking for expected impacts. Few of these stakeholders have responded, and MTIT will continue the consultation process through implementation of the ESMF. As to the MTIT, the following activities and meetings took place:

- A meeting took place introducing the Digital WB&G Project to the Palestine Technical University (PTU) at Khadouri with the presence of the MoE, MHESR, and the MTIT. PTU was invited as it has a virtual education lab. Among those who attended the meeting are:

- Mr. Jihad Draidi, D.G. of Educational Technology and ICT
- Mrs. Kholoud Nasser, General Director of International and Public Relations
- Mr. Ihab Shukri, Director General of School Health
- Mr. Monther Salahat, DBA, Head of Data Base Section
- Dr. Ahmad Othman, Director General for Development and Scientific Research
- Dr. Ashraf Abdulhadi, IT Consultant
- Mr. Samer Musa, Acting Director General of Technical and Vocational Education, PTU
- Mr. Khaled Khanfar, Academic at PTU, Khadouri

The MTIT conducted several meetings related to the project that can be considered among stakeholder engagement activities, among these are:

- Identification mission meetings; attended by representatives from Telecom Department (MTIT), Government Computer center-MTIT, e-government department (MTIT), Complaints Unit (MTIT), and MoE.
- Broad Band in Palestine meetings. The purpose was to make assessment for technical and economic readiness with the companies: Paltel, ISPs (Mada, Call me, Cool Net, etc.) and Jerusalem District Electricity Company. The meeting was attended by Mr. Matthias Halfmann from World Bank. The idea of the Digital WB&G Project was introduced in the meeting.
- A meeting was conducted with the Ministry of the Interior, Public Prosecution, Civil Defense, the Ambulances, etc. to discuss the details of the project component related to the central emergency response.

Several Ministries are already aware of the Digital WB&G Project. Few communicated with the MTIT and asked about their role and how they can benefit the project. This applies also to the two Telecommunication companies, Paltel, Jawwal and Oredoo.

It is clear that several stakeholders are already aware of the MTIT project, but not enough. As all the Palestinian citizens and institutions are to be affected directly or indirectly by the project activities.

11.6.2 Hearing Session

A hearing session was conducted via Zoom, on Sunday December 13, 2020. The session was organized by the MTIT and was carried out by Eng. Samer and Eng. Shuroq from the MTIT and the Consultant. The session targets a group of beneficiaries and those affected by the Digital WB&G Project. Among the invitees are civil societies, JDECO, Internet Service providers, the Palestinian Investment Fund, the Purchase Council, the Civil Defense, the police, the Prosecution, and a group of ministries. More than 30 participants representing several ministries and institutions including Ministry of Transportation, Ministry of Health, Ministry of Interior, Massdear Company, Palestinian computer Society, etc. Project information was presented for the attendees, opinions and concerns were heard and discussed, and inquiries answered.

The main concerns of the hearing session are the required upgrading of the systems at the institutions and the capacity building of the related employees; the security of the information and the privacy of these information; the need to inform and aware the people/public about the e-government and e-

services, especially the e-permits/licenses and e-payment; the prioritization of the application of project components as to cope with the development and related infrastructures at the institutions giving the e-payment the highest priority. In addition, two issues were stressed; the fair access to the services and the information security. During the upgrading it is to make sure that measures are taken to avoid any major interruptions of the digital services.

The following are the minutes of the hearing session and the list of the participants.

List of Participants

No.	Name	Institution
1	Mohammad Shbak	MTIT
2	Rami Jaber	MTIT
3	Samer Ali	MTIT
4	Mohammad Qanadilo	MTIT
5	Inam Sataria	MTIT
6	Alaa Musa	MoT
7	Anwar Jabr	
8	Maysam Al-Baba	MTIT
9	Yousef Irtahi	MTIT
10	Osama Shaheen	Consultant
11	Noor Atallah	Consultant
12	Ra'fat Masri	Massader
13	Mousa Alrefaya	Palestine Computers Society
14	Khalid Kabaha	MoNE
15	Shurooq Khatib	MTIT
16	Lina Tutunji	WB
17	Subhi Hallaq	JDECO
18	Aktham Nammoura	Mol
19	Moath Melhem	MTIT
20	Hiba Hamad	MTIT
21	Tamim Badawi	MoE
22	Omar Zimmo	WB Consultant
23	Jameel Sayed	Palestinian Police
24	Monther Salahat	MHESR
25	Rami Rabah	WB Consultant
26	Abeer Mashni	WB Consultant
27	Hafez Shaheen	Consultant

The Session Proceedings

With the outbreak and spread of COVID-19 and referring to the restrictive measures stipulated in the Health Protocol of the MoH and the WB, a public hearing session was conducted via Zoom, on Sunday December 13, 2020.

The session targets a group of beneficiaries and those expected to be affected by the Digital WB&G Project; Among the invitees were the Civil Society, JDECO, Internet Service providers, the Palestinian Investment Fund, the Purchase Council, the Civil Defense, the Police, the Prosecution, and a group of ministries.

Eng. Shuroq Khatib from the MTIT presented to the attendees the general goals of the Digital WB&G Project, its objectives and indicators, project's components and beneficiaries. The Consultant Dr. Hafez Shaheen, in turn, shed light on the environmental and social considerations of the Project, E&S risks and impacts, GRM, GBV, as well as the WB environmental and social standards.

After that, the 30 attendees were given the chance to express their opinions and concerns and to raise enquiries. Most of the concerns revolved around the project's commencement date, the role of the private sector and the telecommunication companies, the need for public awareness on technological issues; as to raise the benefit from the project and its components, the importance of stakeholders' cooperation, the priorities of digital transformation, fair access to project activities, information security, promoting gender issue, and the importance of the establishment of the energy response center.

- Eng. Tamim Badawi from the MoE stressed on the importance of exchanging information between the ministries benefiting from the project, the inter-ministerial cooperation, as well as the coordination between the stakeholders in order to avoid duplication in dealing with the project;
- Mr. Raed Olayyan, Internet companies' representative, wondered about the role of the private sector and telecommunications companies in the project;
- Eng. Samer Ali, the moderator of the session and the MTIT representative, pointed that the project is to promote the spread of fiber optics in Palestine and encourage investment. Moreover, a feasibility study for the establishment of a national fiber optics company will be carried out.
- Eng. Samer Ali stated that one of the project's interventions is a unified emergency response center. For that, the Civil Defense, the Police and the Ministry of the Interior were invited to attend the session;
- Mr. Raed Olayyan asked about the commencement date of the project;
- Eng Samer Ali replied that the project is currently in the preparation and appraisal stage, and that the components of the project have been approved;
- Mr. Raed Olayyan wondered whether the project would depend on the existing situation and its development, or whether it would rely on fiber optics;
- Mr. Raed Olayyan asked if there will be a public awareness about the technological matters and dealing with them. He also stressed the need for media awareness of all components of the project in order for people to benefit more from them;
- Jumana Duwaik from Palestine Computer Society (PCS), indicated that the project is huge and that each component needs stakeholders' cooperation to obtain the required;

- Eng. Samer Ali, stated that for the media issue, each stakeholder will be informed of all the details that concern him. In addition, he pointed that the project includes electronic services, education and procurement; which would help the government through saving in the bidding and procurement works;
- Mr. Munther Salahat, MHESR representative, stressed the importance of digital transformation and the need to set a clear plan for digital transformation procedures and its priorities. For example, the electronic payment and certification are considered a priority for digital transformation;
- Mr. Rami Jaber, from the MTIT, stated that during the next year, the issue of electronic payment will be activated. Regarding electronic certification, there is an idea in the ministry to make the validations.
- Mr. Alaa Musa, from the MoT, pointed that the MoT encountered problems with the Ministry of Finance regarding the renewal of personal licenses through electronic payment;
- Dr. Omar Zimmo, asked about the mechanism by which the MTIT would ensure fair access to project activities. He also asked about the security of information and the existing laws in this regard, as well as the Ministry measures to promote the issue of gender;
- Eng. Samer Ali replied that a gender unit has been established in the Ministry and the work is underway to formulate its indicators. He also indicated that the Ministry publishes its activities on its website and Facebook Page;
- For the information security, Eng. Yousef Irtahi from the MTIT stated that the Electronic Transactions Law will be updated, especially with regard to electronic signatures;
- Eng. Maysam, from the MTIT, mentioned that the government has a private cloud and gave an emphasis to the importance of citizen's sense of security over information;
- Eng. Ali, from the MoH, focused on the automation and electronic services issues, as well as the need for the establishment of a unified emergency response center; especially with the existence of Corona Pandemic;
- Eng. Samer Ali stated that Cloud readiness was done for all the relevant ministries that will benefit from governmental services;
- Eng. Rami Jaber pointed out that any upgrade will simulate all the raised concerns. The automation for any service is the responsibility of each ministry separately and no need for internal redesign for the systems. Additionally, there will be no interruption in the services provided by the ministries;
- Dr. Omar Zimmo inquired about the institutional arrangement for the project;
- Eng. Samer Ali responded that the MTIT is working on setting the institutional arrangement in cooperation with the World Bank and the Council of Ministers, but it has not yet been approved. He added that the less fortunate groups will be targeted and will be reached through the Ministry of Social Development (MoSD), but the mechanism has not yet been agreed upon. Moreover, the MTIT has a digital empowerment plan that targets poor families at special prices;
- Eng. Samer Ali mentioned that every intervention will be made, through national teams from all relevant ministries.

11.7 Occupational Health and Safety Guidelines

1. Principles

Employers must take all reasonably practicable steps to protect the health and safety of workers and provide and maintain a safe and healthy working environment. The following key principles are relevant to maintaining worker health and safety:

1.1 Identification and assessment of hazards

Each employer must establish and maintain effective methods for:

- Systematically identifying existing and potential hazards to employees;
- Systematically identifying, at the earliest practicable time, new hazards to employees;
- Regularly assessing the extent to which a hazard poses a risk to employees.

1.2 Management of identified hazards

Each employer must apply prevention and control measures to control hazards which are identified and assessed as posing a threat to the safety, health or welfare of employees, and where practicable, the hazard shall be eliminated. The following preventive and protective measures must be implemented order of priority:

- Eliminating the hazard by removing the activity from the work process;
- Controlling the hazard at its source through engineering controls;
- Minimizing the hazard through design of safe work systems;
- Providing appropriate personal protective equipment (PPE).

The application of prevention and control measures to occupational hazards should be based on comprehensive job safety analyses (JSA). The results of these analyses should be prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

1.3 Training and supervision

Each employer must take all reasonably practicable steps to provide to employees (in appropriate languages) the necessary information, instruction, training and supervision to protect each employee's health and to manage emergencies that might reasonably be expected to arise in the course of work. Training and supervision include the correct use of PPE and providing employees with appropriate incentives to use PPE.

1.4 General duty of employees

Each employee shall:

- Take all reasonable care to protect their own and fellow workers' health and safety at the workplace and, as appropriate, other persons in the vicinity of the workplace;

- Use PPE and other safety equipment supplied as required; and,
- Not use PPE or other safety equipment for any purpose not directly related to the work for which it is provided.

1.5 Protective clothing and equipment

Each employer shall:

- Provide, maintain and make accessible to employees the PPE necessary to avoid injury and damage to their health;
- Take all reasonably practicable steps to ensure that employees use that PPE in the circumstances for which it is provided; and,
- Make provision at the workplace for PPE to be cleaned and securely stored without risk of damage when not required.

2. Design

Effective management of health and safety issues requires the inclusion of health and safety considerations during design processes in an organized, hierarchical manner that includes the following steps:

- Identifying project health and safety hazards and associated risks as early as possible in the project cycle; including the incorporation of health and safety considerations into the worksite selection process and installation methodologies;
- Involving health and safety professionals who have the experience, competence, and training necessary to assess and manage health and safety risks;
- Understanding the likelihood and magnitude of health and safety risks, based on:
 - The nature of the project activities, such as whether the project will involve hazardous materials or processes;
 - The potential consequences to workers if hazards are not adequately managed;
- Designing and implementing risk management strategies with the objective of reducing the risk to human health;
- Prioritizing strategies that eliminate the cause of the hazard at its source by selecting less hazardous materials or processes that avoid the need for health and safety control;
- When impact avoidance is not feasible, incorporating engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences;
- Preparing workers and nearby communities to respond to accidents, including providing technical resources to effectively and safely control such events, in particular relating to traffic;
- Improving health and safety performance through a combination of ongoing monitoring of facility performance and effective accountability.

3. Implementation

3.1 Documentation

An OHS plan must be prepared and approved prior to any works commencing on site. The plan must demonstrate the Contractor's understanding of how to manage safety and a commitment to providing a workplace that enables all work activities to be carried out safely. It must detail reasonably practicable measures to eliminate or minimize risks to the health, safety and welfare of workers, contractors, visitors, and anyone else who may be affected by the operations. The Plan must be prepared in accordance with the World Bank's EH&S Guidelines and the relevant local health and safety legislation.

3.2 Training and Awareness

Provisions should be made to provide health and safety orientation training to all new employees to ensure they are apprised of the basic site rules of work at/ on the site and of personal protection and preventing injury to fellow employees. Training should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Visitors are not permitted to access to areas where hazardous conditions or substances may be present, unless appropriately inducted.

3.3 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems.

PPE is considered to be a last resort that is above and beyond the other facility controls and provides the worker with an extra level of personal protection. Recommended measures for use of PPE in the workplace include:

- Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure;
- protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual;
- Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE should be part of the recurrent training programs for Employees; and,
- Selection of PPE should be based on the hazard and risk ranking and selected according to criteria on performance and testing established.

4. Monitoring

Occupational health and safety monitoring programs should verify the effectiveness of prevention and control strategies. The selected indicators should be representative of the most significant occupational, health, and safety hazards, and the implementation of prevention and control strategies. The occupational health and safety monitoring program should include:

- Safety inspection, testing and calibration: This should include regular inspection and testing of all safety features and hazard control measures focusing on engineering and personal

protective features, work procedures, places of work, installations, equipment, and tools used. The inspection should verify that issued PPE continues to provide adequate protection and is being worn as required.

- Surveillance of the working environment: Employers should document compliance using an appropriate combination of portable and stationary sampling and monitoring instruments. Monitoring and analyses should be conducted according to internationally recognized methods and standards.
- Surveillance of workers' health: When extraordinary protective measures are required (for example, against hazardous compounds), workers should be provided appropriate and relevant health surveillance prior to first exposure, and at regular intervals thereafter.
- Training: Training activities should be adequately monitored and documented (curriculum, duration, and participant s). Emergency exercises, including fire drills, should be documented adequately.
- Accidents and Diseases monitoring. The employer should establish procedures and systems for reporting and recording:
 - Occupational accidents and diseases
 - Dangerous occurrences and incidents

These systems should enable workers to report immediately to their immediate supervisor any situation they believe presents a danger to life or health. Each month, the contractor shall supply data on trainings delivered, safety incidents prevented and any accidents to the EHS officer. These data are to also include incidents related to any sub-contractors working directly, or indirectly, for the Contractor.

11.8 E-Waste: Potential Impacts and Proposed Management

E-waste poses a significant threat on 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 evidences 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 damages. 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.

E-waste management procedures shall be adopted during installation, operation and closure phases and will follow and comply with the ESS1 and ESS3 of the Environmental and Social Framework of the World Bank. This will cover electrical and telecommunication waste, that could occur during the upgrade or renewal of installations and infrastructures, as well as during operation and replacement of electrical equipment (computers, servers, cables, etc.) and the equipment end of life. MTIT should establish and adopt e-waste management plan that will be prepared to describe the waste management related issues to project activities and specify the best way to address these issues, giving specific actions, targets and timeframes. Among the proposed procedures for e-waste management plan:

- Defining e-waste sources during all project phases including planning, siting, and equipment upgrades, in order to identify e-waste generation, pollution prevention opportunities, and necessary treatment, storage, and disposal infrastructure;
- Substituting raw materials or parts with less hazardous or toxic materials, or with those where processing generates a lower e-waste volume;
- Reducing/ minimizing hazardous e-waste generation by implementing e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste from be managed;
- Reuse/recycling of products that can be reintroduced into the operational processes;
- Investigation of markets for recycling by other industrial processing operations, located in the region;
- Establishing formal tracking of e-waste generation and recycling rates;
- On-site or off-site chemical, or physical treatment of the e-waste material to render it non-hazardous prior to final disposal;
- Treatment or disposal at permitted facilities specially designed to receive the e-waste;

- Hazardous e-waste should be properly stored to prevent or control accidental releases to air, soil, and water resources;
- Conducting periodic inspections of e-waste storage areas;
- All e-waste containers, designated for off-site transportation, should be secured and labeled with the contents and associated hazards;
- The result of the public consultations shall be included in the e-waste management plan for all project activities

11.9 Sample Code of Conduct

CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, *[enter name of Contractor]*. We have signed a contract with *[enter name of Employer]*, for *[enter description of the Works]*. These Works will be carried out at *[enter the Site and other locations where the Works will be carried out]*. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation, sexual abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Sites or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as **"Contractor's Personnel"** and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor's Personnel. Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor's Personnel shall:

1. carry out his/her duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
3. maintain a safe working environment including by:
 - a) ensuring that workplaces, machinery, equipment and processes under each person's
 - b) control are safe and without risk to health;
 - c) wearing required personal protective equipment (PPE);
 - d) using appropriate measures relating to chemical, physical and biological substances and
 - e) agents; and
 - f) following applicable emergency operating procedures.
4. 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;
5. treat other people with respect and not discriminate against specific groups such as women,
6. people with disabilities, migrant workers or children; 6. 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 Contractor's or Employer's Personnel;
7. 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. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from Bank financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain;
8. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal coercive conditions;

9. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. report violations of this Code of Conduct;
12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

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 in either of the following ways:

1. Contact [*enter name of the Contractor's Social Expert with relevant experience in handling sexual exploitation, sexual abuse and sexual harassment cases, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters*] in writing at this address [] or by telephone [] or in person at []; or
2. Call [] to reach the Contractor's hotline (*if any*) and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted 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 persons who experience 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.

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.

FOR CONTRACTOR'S PERSONNEL:

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 [*enter name of Contractor's contact person(s) with relevant experience (including for sexual exploitation, abuse and harassment cases) in handling those types of cases*] requesting an explanation.

Name of Contractor's Personnel: [*insert name*]

Signature: _____

Date (day/month/year/): _____

Countersignature of authorized representative of the Contractor:

Signature: _____

Date (day/month/year/): _____