



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 06/18/2020 | Report No: ESRSA00869



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
West Bank and Gaza	MIDDLE EAST AND NORTH AFRICA	P174078	
Project Name	West Bank Emergency Social Protection COVID-19 Response Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	6/17/2020	7/23/2020
Borrower(s)	Implementing Agency(ies)		
Palestinian Liberation Organization	Ministry of Social Development, Ministry of Labor/Palestinian Fund for Employment and Social Protection for Workers, Ministry of Finance		

Proposed Development Objective(s)

To provide cash support and short-term employment opportunities to vulnerable populations in West Bank affected by COVID-19.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>40.00</b>

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

Yes

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

The project aims to respond to the immediate needs arising from the COVID-19 pandemic by providing temporary emergency cash transfers to vulnerable and poor households and contributing to reducing the deficit in health and social services through temporary job creation.



**D. Environmental and Social Overview**

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project activities cover the entire area of the West Bank. The project activities will take place in both urban and rural affected areas where the project beneficiaries are individuals and NGOs providing social services and possible agricultural activities. The concentration of the project in West Bank is due to its labor force and economic activities compared to those of Gaza. Even though the unemployment rate is higher in Gaza; however, people in the West Bank are more likely to be affected by the labor income shock produced by the pandemic. First, travel rest restrictions in the former made contagion from the latter and Israel, more difficult. At the same time, the West Bank is simply more exposed: one in every four waged workers in the West Bank works in Israel every day, and the restrictions on travel to Israel have caused this source of income to disappear. Second, there is a higher dependency of the West Bank economy on manufacturing, construction, commerce, hotels and restaurants, which are linked to the international tourism activities in the holy sites. Third, the two regions have very different employment structures. In contrast to jobs in the private sector, public-sector jobs are not affected by changes in demand or supply-chain disruptions. In Gaza, over half of jobs are either in the public sector or UNRWA, while in the West Bank, two-thirds of jobs are in the private sector. As stated above, the newly enrolled beneficiaries of emergency assistance have been almost exclusively private sector workers, own account workers, or small business owners from the West Bank.

The specific locations for project interventions are yet to be determined in the course of project implementation. The project is not expected to include any civil works. This operation is funded from the West Bank and Gaza Trust Fund (WBGTF) and will follow the fast track processing of the World Bank COVID19 Facility.

**D. 2. Borrower’s Institutional Capacity**

The Ministry of Finance (MoF)/PCU with the involvement of three entities working closely with MoF will be responsible for implementing each component respectively, Component 1 – Cash Transfer, Ministry of Social Development (MoSD) and Ministry of Labor (MoL) in concert with the Palestinian Fund for Employment and Social Protection (PFESP) will be the implementing entity for component 2. The MoF will have the primary responsibility for project implementation and ensuring compliance with the Bank’s procedures and guidelines. The MoF will closely coordinate efforts with the other entities mentioned above. Based on the Borrower’s capacity assessment tool, the three different levels of capacity assessment are analyzed for the MoF and the three ministries involved in the project implementation. MoF has long been involved with the Bank in operations in West Bank and Gaza since the establishment of the Palestinian Authority in 1994. They implemented successfully operations of similar nature such as Finance for Jobs” Series of Projects (SOP). MoF is staffed with competent personnel to implement the fiduciary, operational and technical aspects for such projects. However, due to lack of experience and capacity in implementing E&S safeguards, MoF have engaged environmental consultants for the preparation, implementation and monitoring of environmental and social compliance of these projects In addition to limited E&S capacity mentioned above and since none of the projects were carried out were under the Bank ESF, MoF capacity with regards to E&S requirements, including ESS2, ESS4, and ESS10 is very limited. Moreover, the Ministry does not have record of in-house environmental and social management capacity. Due to capacity constraints of the Recipient, the MoF shall establish and maintain a Project Coordination Unit (PCU) with qualified staff and resources to support management of

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Environmental, Social, Health and Safety (ESHS) risks and impacts of the Project, including an Environmental and Social Officer (ESO), a Health and Safety Specialist and an external social consultant to support the Officer.

**II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

Substantial

**Environmental Risk Rating**

Substantial

The Project includes 4 components, namely:

**Component (i) Emergency Cash Transfers in the West Bank**

This component will finance temporary (three months) cash transfers to poor and vulnerable households affected by COVID-19 in the West Bank.

**Component (ii) Cash for Work in the West Bank (C4W)**

This component will finance short temporary employment (6 months) for approximately 5,200 (of which 2,600 women) beneficiaries.

**Component (iii): Capacity Building Project Management, Monitoring and Evaluation**

This component will ensure that the Project Coordination Unit (PCU) and the technical entities working directly with the PCU will be operational and will implement the Project in conformity with the Legal Agreement, the PAD, and project’s OM. It will support the PIA, MoSD, and the PFESP with the management, monitoring and evaluation (M&E) of project activities.

**Component (iv): Contingent Emergency Response Component (CERC)**

In the event of a future eligible crisis or emergency, the project will contribute to an immediate and effective response via a Contingency Emergency Response Component (CERC).

The environmental risk is classified as Substantial, given the combination of Operational Health and Safety (OHS) risks and the Borrower’s limited capacity in environmental and social risk management. OHS risks are mainly associated with the work of beneficiaries in subprojects/activities under component 2. Beneficiaries will be operating in the agricultural sector, clinics, or will be working with disabled children in schools, in early childhood support, food distribution, and will provide assistance to the elderly. Elders, persons with disability and those with preconditions are more vulnerable to COVID-19 infection, therefore social workers need to comply with OHS guidelines, including through the wear of adequate PPEs, to avoid COVID-19 contagion.

Beneficiaries working in agricultural projects may also be exposed to health and safety risks associated with pesticides use and injuries from agricultural equipment. Waste and medical waste management generated during the subproject activities may also constitute a substantial risk for workers and community health and safety.

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**Social Risk Rating**

Substantial

The overall social risk is rated substantial. The risks can be summarized as: (i) risks of elite capture, especially with regards to component 1.1 that targets the vulnerable groups that are not fully identified; (ii) risks associated with poor targeting and social exclusion based on gender, disability and other forms of vulnerability under component 1 and 2; (iii) community health and safety risks due to exposure to communicable diseases, including COVID-19, and potentially inadequate management of hazardous medical waste and pesticides under component 2. Vulnerable youth, including children, and women may be exposed to violence, sexual exploitation and abuse and sexual harassment risks in exchange for project benefits under C4W component; and finally (iv) risks related to labor and working conditions for direct and contracted workers, under component 2.

To address the risk related to social inclusion under the cash transfer component, CTP-beneficiaries are ranked through a proxy means testing and categorized as poor or extreme poor. The newly poor enrolling through component 1.1. will be those affected by COVID-19 through loss of livelihood/income and then included through a unique form/system in the CTP database. The Cash for Work component (2) also benefits the most vulnerable, those that are unemployed and will receive temporary cash support by working for 6-months just below the minimum wage. The stipend/wage rate just set below the minimum wage incentives those in need to apply and avoids market distortions on the labor market. To ensure inclusion of women 50% of household beneficiaries and at least 50% of beneficiaries of the C4W are women. In addition, the project includes an indicator under C4W for inclusion of the elderly, children, and disabled. Under this component 10% of the end beneficiaries are disabled. Finally, the project mitigates these risks through robust engagement mechanism through a Stakeholder Engagement Plan. The risks related to Gender Based Violence (GBV), workers and COVID transmission are addressed under ESS1 and ESS2.

**B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

**B.1. General Assessment**

**ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

**Overview of the relevance of the Standard for the Project:**

ESS1 is relevant given an array of environmental and social risks identified. Those include health and safety risks due to the exposure of contracted workers to vulnerable people who might be infected with communicable diseases, including COVID-19. Social work under component 2 will be associated with health clinics, with support to disabled children in schools, early childhood support, and assistance to the elderly and to those with preconditions who can be more vulnerable to the COVID-19 infections and may increase OHS risks. Therefore, effective OHS and infection controls measures in compliance with WHO recommendations, other relevant GIIP ESS2 and ESS4 should be put in place to minimize such risks. Also workers in the agricultural sector (working in potential activities in small scale farming (crops, fruits, vegetable cultivation), and farmer fields and cooperatives providing fruits and vegetables to schools, social services and to markets and small scale herders, small scale processing of fruits and vegetables to make them market ready, such as dried fruits, herbs, olives etc.) would be subject for OHS risks including exposure to pesticides. To mitigate the risks mentioned above, the Borrower will ensure sound environmental and social health and safety procedures with adequate provisions for minimizing occupational health and safety risks; ensuring adequate supply and use of appropriate PPE and hygienic precautions (particularly face masks, gloves, hand washing soap and sanitizers); ensure the existence of health screening for the workers, ensure keeping distance at the work place and ensuring that adequate handling and disposal procedures of hazardous wastes are in place in accordance to

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the Environmental and Social Management Framework (ESMF) provisions of the West Bank and Gaza COVID19 Emergency Response Project (P173800).

Given that the exact locations of project sites and associated facilities will be fully identified during project implementation, the Borrower will prepare, consult, and disclose an environmental and social management framework (ESMF) and follow up instruments including a Labor Management Procedures (LMP) and Stakeholder Engagement Plan (SEP). The ESMF, will assess and manage environmental risks and social impacts associated with proposed Project activities in a manner which is proportionate to the significance of the potential risks and impacts, and which utilizes a mitigation hierarchy approach. The ESMF will identify presence of disadvantaged and vulnerable groups, and will cover all anticipated project activities including working in social services and agricultural sector, and Contingency Emergency Response Component (CERC). The ESMF will set the rules for follow-up (site-specific) instruments once identified and the institutional and monitoring arrangements. The MOF will prepare the ESMF no later than one month after project effectiveness. In addition to the ESMF, the client will comply with measures and actions set out in the Environmental and Social Commitment Plan (ESCP). It will also implement the SEP and LMP in the proposed timeline.

To address the possible exclusion of vulnerable groups targeted under component 1 and 2, such as the elderly and the disabled, and female heads of households, the project will build on a delivery platform developed and already successfully implemented in Gaza and will specifically target vulnerable groups in the Stakeholder Engagement Plan (SEP). The Project will also ensure appropriate stakeholder engagement across the project cycle through a stakeholder engagement plan (SEP) proportionate to the project risk and will strengthen the GRM system under the existing national cash transfer program to enhance project sustainability including GBV and labor related risks.

In addition, to address GBV risks, especially among vulnerable youth and women, the Project will use targeted communications and outreach tools on preventing gender-based violence, especially in times of emergencies, stress management at household level and healthy conflict resolution. It will also leverage the ongoing Social Protection Enhancement Project (SPEP) program's focus on GBV, utilizing female social workers trained on GBV tools as part of the communications to households on public health measures and stress management. As such, the project will embed culturally sensitive messaging in the delivery of the cash transfers to understand the possible emotional reactions to the crisis, learn positive ways of coping, know where to seek assistance if needed and to promote healthy conflict resolution and stress management at household level. It will also explore the use of behavioral insights, for example by labeling the transfers and top-ups in a way that values the redistribution of care work among household members.

For the CERC component of the project, all activities under this component will be subject to World Bank E&S measures, including paragraph 12 of the IPF Policy applies once the CERC is applicable. The CERC activities will be assessed based on the Project's social and environmental assessments and ESF instruments, to be prepared for the project, to ensure that as much as possible is known regarding risks and management measures in anticipation of an emergency response. A section on the CERC shall be included in the Project Environmental and Social Management Framework (ESMF) indicating the list of activities related to the likely emergencies that led to the CERC's inclusion in the project.



### ESS10 Stakeholder Engagement and Information Disclosure

The primary project stakeholders will involve beneficiaries including vulnerable households affected by the COVID-19 crisis, members of households benefiting from the cash transfer and C4W and vulnerable people directly benefiting from services provided under C4W projects (e.g., those affected by the COVID-19 disease, those being sick, disabled, elderly, children, and women), and Bedouin communities, who might not have internet access and require differentiated engagement methodologies, three ministries (MoF, MoL/PFESP and MoSD) involved in the project implementation, and the NGOs providing social services. Consultations with different stakeholders will be carried out by the project effectiveness and before carrying out of the relevant Project activities, including consultation for the preparation of the ESMF. A preliminary Stakeholder engagement plan (SEP) will be developed prior to project appraisal which will be update and implemented throughout the project life cycle. The SEP indicates that if internet option is not available to women at villages or Bedouin communities the ministry will assign a mobile number and contact person who can be reached by these groups. This information is provided to them during the consultation.

### B.2. Specific Risks and Impacts

**A brief description of the potential environmental and social risks and impacts relevant to the Project.**

#### ESS2 Labor and Working Conditions

ESS2 is relevant. Categories of labor involved include direct workers (PCU staff and government employee), and contracted workers (including teachers, social workers, psychologists, data collectors/data entry, health support staff, guards, etc.). The estimated number of direct workers is not likely to exceed 6 staff from MoF (PCU staff) and the estimated number of contracted workers (short temporary employment of 6 months) is approximately 5,200 of which 2,600 women. Potential labor risks are related to OHS as mentioned above, child labor in agricultural subprojects and female workers being subjected to sexual harassment, general labor working conditions, GBV and VAC for all workers. To mitigate the risks previously mentioned, the Borrower will prepare a labor management procedure to identify risks and set mitigation measures. The LMP will include provisions on working conditions, OHS procedures for protection of workers in relation to infection control precautions, risk of child labor, grievances mechanisms for the type of workers, the minimum age and age verification protocol for workers, selection of capable NGOs, use of code of conduct and training/awareness-raising. To prevent GBV risks, the project will address increased incidents of GBV through its CTP top-ups and explore the use of behavioral insights as mentioned above. As such, the project will target GVB cases that are researched, documented and followed up by the Family and Child Department at MoSD. In addition to cash transfer, behavioral insights such as GBV related prevention messages will be used. Such messages can be adapted and disseminated on social media, through TV and radio spots and campaigns and mobile text messages. Information about the available GRM and GBV referral pathways may be included in these messages as well.

The borrower will also require the implementing NGOs to develop a workers' GRM to address child labor issues, GBV and sexual harassment related grievances. The GRM should include channels to accept and respond to anonymous related complaints. The GRM shall be communicated to all stakeholders during the consultation as indicated in the SEP.





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

ESS3 is relevant. The project presents pollution risks due to potentially inadequate management of hazardous medical waste and pesticides under component 2. To mitigate these risks, the Borrower will establish relevant solid, hazardous, and medical waste plans and Integrated Pest Management Plan (IPMP) to be part of the ESMF with adequate provisions to make sure that adequate medical waste handling and disposal procedures and relevant emergency preparedness and response measures are in place.

### **ESS4 Community Health and Safety**

ESS4 is relevant. The main community health and safety risks identified are related to exposure, infection, transmission of COVID19 virus and potential exposure to communicable diseases by social workers associated with the project activities; adequate prevention and response to sexual exploitation and abuse, and sexual harassment. The project will follow WHO guidelines on OHS for social workers operating in long-term care facilities and with vulnerable groups and will also implement relevant emergency preparedness and response measures. When site-specific ESMPs and OHS plans are prepared, community health and safety risks will be identified and any vulnerable groups will be identified. The borrower will prepare, adopt and implement Community Health and Safety Management Plan to be part of the ESMF including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; provisions to prevent and respond to sexual exploitation and abuse, sexual harassment or GBV in a manner consistent with ESS1 and ESS10, and commensurate with the risks, for example through formalizing strengthening referral pathways within the GRM, and proper disposal procedures of wastes to protect the communities. The project level GRM referral pathways will include assigning an experienced social worker from the MoSD to handle and treat complaints on sexual exploitation and abuse, sexual harassment and domestic violence related to the project activities and will provide support victims of the domestic violence. The Borrower will document available resources and responsibilities, including the availability of PPE and disinfectants, in compliance with ESS2 and ESS4. The project level GRM will include specific procedures for GBV including confidential reporting and ethical documentation of GBV cases. To prevent GBV risks, the project will embed culturally sensitive messaging in the delivery of the cash transfers to promote healthy conflict resolution and stress management at household level. It will also explore the use of behavioral insights, for example by labeling the transfers and top-ups in a way that values the redistribution of care work among household members.

### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

ESS5 is not currently relevant. There is no land acquisition required under the project.

### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

No construction activities are expected in this project that could affect protected areas, flora or fauna.

### **ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

ESS7 is not currently relevant. No population meeting the definition of ESS7 will be affected under this project





**ESS8 Cultural Heritage**

ESS8 is not currently relevant. No tangible or untangle cultural heritage will be impacted by the project activities.

**ESS9 Financial Intermediaries**

Not currently relevant. There are no financial intermediaries that are part of the project.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)**

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
<b>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</b>	
REGULAR REPORTING: Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, stakeholder engagement activities and grievances log. Inform the Association about any incident or accident caused by or affecting Project implementation which has had or is likely to have a significant adverse impact on the workers, communities, the public, or the natural environment.	09/2020
ORGANIZATIONAL STRUCTURE: The MoF shall establish and maintain a Project Coordination Unit (PCU) with qualified staff and resources to support management of environmental and social risks and impacts of the Project, including an Environment and Social Officer, a Health and Safety Specialist, and an external social consultant to support the Officer	09/2020
ENVIRONMENTAL AND SOCIAL SCREENING/MANAGEMENT PLANS/ CONTRACTORS a. Assess the E&S risks and impacts of proposed Project activities in accordance with ESS1 and the ESMF/ESMP to be prepared disclosed and adopted for the Project,	09/2020
b. Prepare, disclose, adopt, and implement any environmental and social management plans or other instruments required for the respective Project activities as per the Project ESMF, in a manner acceptable to the Association once subproject is identified.	09/2020
c. Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and	09/2020

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supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.	
<b>ESS 10 Stakeholder Engagement and Information Disclosure</b>	
STAKEHOLDER ENGAGEMENT PLAN: Prepare, disclose, adopt, and implement a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association.	09/2020
STAKEHOLDER ENGAGEMENT INFORMATION AND DISCLOSURE: Adopt measures as set out in the Operational Manual to ensure that the carrying out of Project activities includes stakeholder engagement and information disclosure consistent with ESS10.	09/2020
GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Bank.	09/2020
<b>ESS 2 Labor and Working Conditions</b>	
LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including preparing and implementing the Labor Management Procedures (LMP).	09/2020
OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES: Adopt, implement and update the Occupational Health and Safety (OHS) measures in line with LMP and WHO guidelines on COVID-19 in a manner acceptable to the Bank.	09/2020
<b>ESS 3 Resource Efficiency and Pollution Prevention and Management</b>	
Relevant aspects of this standard shall be considered, as needed, under ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS action above, including, inter alia, measures to manage health care wastes and other types of ha	10/2020
<b>ESS 4 Community Health and Safety</b>	
Prepare, adopt and implement Community Health and Safety Management Plan as part of the ESMF including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; (see below)	09/2020
provisions to prevent and respond to sexual exploitation and abuse, sexual harassment or GBV , in a manner consistent with ESS1 and ESS10, and commensurate with the risks (see below),	09/2020
for example through formalizing strengthening referral pathways within the GRM, and proper disposal procedures of wastes to protect the communities. GRM referral pathways will include assigning an experienced social worker from the MoSD (see below)	09/2020



to handle and treat complaints on sexual exploitation and abuse, sexual harassment and domestic violence related to the project activities. Information about the available GRM and referral pathways may be disseminated on social media, (see below)	09/2020
local radios, and may also be printed and made available, and visible on project locations such as offices of NGOs selected to implement Cash for Work (C4W) and implement subprojects in community work and livelihood activities.	09/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
ESS 8 Cultural Heritage	
ESS 9 Financial Intermediaries	

**B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts**

**Is this project being prepared for use of Borrower Framework?**

No

**Areas where “Use of Borrower Framework” is being considered:**  
not relevant

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

Borrower: Palestinian Liberation Organization

**Implementing Agency(ies)**

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Implementing Agency: Ministry of Social Development

Implementing Agency: Ministry of Labor/Palestinian Fund for Employment and Social Protection for Workers

Implementing Agency: Ministry of Finance

**V. FOR MORE INFORMATION CONTACT**

The World Bank  
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**VI. APPROVAL**

Task Team Leader(s):	Cristobal Ridao-Cano, Samira Hillis, Friederike Rother
Practice Manager (ENR/Social)	Lia Sieghart Cleared on 16-Jun-2020 at 11:56:9 EDT
Safeguards Advisor ESSA	Nina Chee (SAESSA) Concurred on 18-Jun-2020 at 18:49:40 EDT