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# REPUBLIC OF IRAQ

## MINISTRY OF YOUTH AND SPORTS (MoYS)

### ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

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#### MOSUL – YOUTH INCLUSION THROUGH CULTURAL AND CREATIVE INDUSTRIES PROJECT - (P178770)

July 2022

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## **LIST OF ACRONYMS AND ABBREVIATIONS**

CFP	Chance Funds Procedure
CCI	Cultural Creative Industries
CHMP	Cultural Heritage Management Plan
CoC	Code of Conduct
ESHS	Environment Social Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMF	Environment and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standard
GBV	Gender Based Violence
GM	Grievance Mechanism
GoI	Government of Iraq
GRM	Grant Reporting and Monitoring
ICLT	Indigenous Communal Land Titling
MoYS	Ministry of Youth and Sport
NGO	Non-Government Organization
PAP	Project Affected People
PMU	Project Management Unit
SLC	Social Land Concession
YICCI	Youth Inclusion through Cultural and Creative Industries

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## **EXECUTIVE SUMMARY**

This document presents an Environmental and Social Management Framework (ESMF) for the **(Mosul – Youth Inclusion through Cultural and Creative Industries Project - (P178770))** for the benefit of the Iraqi Ministry of Youth and Sports (MoYS). The Government of Iraq, with the support of the World Bank, aims to develop and promote the social and economic inclusion of vulnerable youth (aged between 15 and 29) and women in Mosul through the Cultural Creative Industries (CCI) sector, and foster civic engagement through local cultural community development initiatives. The provisional budget is about 3.15 million US\$ which will include the preparation of this ESMF and the implementation of E&S requirements inter alia SEP, LMP, and GM.

The consultation was undertaken with about 23- individual stakeholders and resulted that the majority of them strongly agreed/ agreed that the project will have multiple positive impacts on the local men and women youth. In addition, the majority agreed that the project will enhance the employability of the beneficiary population in Mosul through the provision of technical, life and soft skills development training and increase entrepreneurship support (financial and technical support) to self-employed youth and women, and support micro and small businesses in the CCI sector; and as well as it will engage youth and women in the design and roll-out of local cultural initiatives to support community cohesion in Mosul.

The project will consist of the following three (3) main components:

### **Component 1: Supporting skills development for micro-entrepreneurship in the CCI sector**

*1.1: Life and social skills, and technical and vocational trainings to increase local engagement employability and micro-entrepreneurship in the CCI sector*

This will provide life and social skills training to at least 2,000 vulnerable youth and women in Mosul. The training activities will be implemented by the MoYS PMU with the support of a contracted local service provider. This will build on the successful achievements of the Youth Livelihoods Training activity in the first JSDF pilot, which was the flagship activity of the previous project and reached 100 percent of the target number of beneficiaries. The training will include a mixed set of engaging activities such as leadership, decision-making, communications training, arts, cultural heritage and sports, community-based events, and group-based psychosocial support. The vocational training will prepare the youth for entrepreneurship opportunities with a focus on a range of local occupations in the cultural and creative industries sector,

ranging from visual arts, crafts and intangible cultural heritage (e.g. handicraft, cobbling, tailoring, jewelry, culinary traditions, management of heritage sites, etc.) to design and creative services such as housing-related industries (e.g. furniture, lighting, or home textile).

### *1.2: Start-up support for developing youth micro-entrepreneurship in the CCI sector*

The start-up support will be provided in a form of matching grant where at least 1,000 eligible beneficiaries would be required to match a minimum percentage of the grant value with in-kind and/ or financial contribution to create a greater sense of ownership, therefore increasing the chances of micro-entrepreneurship success with sustained results beyond the project.

### **Component 2: Fostering civic engagement through local cultural community development initiatives**

This component will finance youth and women-driven community development initiatives in the host communities by engaging at least 1,000 young beneficiaries to optimize the results of enterprise and skills development.

Young participants would be eligible provided that they participated in the soft skills trainings, following which they will be trained on how to design and implement local cultural community projects.

### **Component 3: Project Management**

This component will support the project management for the coordination and implementation of activities including some operating costs; project monitoring and evaluation activities ;preparation of the final evaluation report including lessons learned; environmental and social risk management; participatory evaluations; and annual audits.

The Project Implementing Entity will be the Ministry of Youth and Sports (MoYS), which will be responsible for the overall implementation of the project and overseeing, for this purpose; the MoYS has composed a PMU to support the management of this operation. The ESMF covers environmental and social issues and potential negative impacts that are associated with



the project, where all the impacts are largely of low to moderate significance. The following represent potential environmental and social negative impacts of the project:

- Community health and safety risks, in particular exposure to Covid-19 at training events.
- Occupational health & safety risks
- Impacts of management and disposal of generated waste associated with the installation and use of equipments, in addition to non-hazardous waste, especially papers from workshops, training and meetings throughout the project duration.
- Risks related to poor labor and working condition including child and forced labour.
- Inefficient consumption of water, energy and other resources.
- Risks associated with Sexual Exploitation and Abuse and Harassment (SEAH)

Environmental and social mitigation measures have been developed and included in this Framework, (Chapter 5 – Table 5), which comprise of the mitigation and monitoring measures to be adopted during the project implementation, as well as the roles and responsibilities for the implementation supervision. The project will be implemented by the Project Management Unit (PMU) of the Ministry of Youth and Sports (MoYS). The PMU team will need capacity building to promote their ability to handle this operation acquire the ESF required knowledge.

The project will establish both a **grievance mechanism (GM)** at project level and a separate **Workers GM**. The latter has been described in detail in the project Labor Management procedures (LMP) – Chapter 8 of this document. The project level GM is described in detail in the SEP document.

The procedures will include the following set of measures as a minimum, such as receipt, acknowledgment and registration; grievance verification and assessment; response and feedback, track, and evaluate the process and results whereas the estimated total budget for the implementation of the ESMF is 35, 200 USD.

# **CHAPTER ONE: INTRODUCTION**

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## **1.1 Background**

## **1.2 Rationale of the ESMF**

The ESMF is to propose high-level principles, guidelines and procedures to screen, assess, approve, manage and monitor the mitigation measures of environmental and social impacts of the project activities/subprojects. . It describes the steps involved in identifying and mitigating the potential environmental and social impacts of the Project and ensures that all relevant institutional capacity building and training needs are established for effective implementation of mitigation measures . A mitigation hierarchy approach has been adopted during the development of this ESMF in order to: avoid risks and impacts when possible; minimize or reduce risks and impacts to acceptable levels where avoidance was not possible; mitigate; and compensate for remaining significant residual impacts or offset them. ESMF is prepared as the specific sites of project activities have not selected and finalized at this stage.

The output of this ESMF is intended to ensure that the proposed project will be environmentally and socially sound and sustainable.

## **1.3 Methodology used in Developing the ESMF**

This ESMF is basically the outcome of observations and consultations made with key selected stakeholders, review of relevant records, procedures, guidelines and policy and legal framework applicable within the Iraqi context. The following methodology was adopted:

### ***- Desktop Review:***

This consisted of reviewing relevant documentation (both print and electronic) made available and they include: the World Bank Concept Note for the proposed project; national legal and policy documents on Environmental Management and Environmental Impact Assessment; and the World Bank's ESF.

### ***- Consultation session:***

the consultations provided the opportunity to:

- Provide an opportunity for the potential beneficiaries to express their views and concerns with respect to the planning and implementation of the project

- Discuss the draft report with the stakeholders. The comments/observations coming out of the participants are duly incorporated in the final report. Based on the discussions, specific interests and potential roles and responsibilities of stakeholders were discussed and identified, which would facilitate their participation, ownership and sustainability of the project.

The consultation was undertaken with about 23 individual stakeholders and resulted that the majority of them strongly agreed/ agreed that the project will have multiple positive impacts on the local youth men and women. In addition, the majority agreed that the project will enhance the employability of the beneficiary population in Mosul through the provision of technical, life and soft skills development training and increase entrepreneurship support (financial and technical support) to self-employed youth and women, and support micro and small businesses in the CCI sector; and as well as it will engage youth and women in the design and roll-out of local cultural initiatives to support community cohesion in Mosul.

-E&S Risks and Impact Assessment and Management Methodology.

Impacts identified are further assessed and discussed. The method used for the assessment of the relevant impacts is involved:

- Anticipation and Avoidance: What will happen to the environment as a consequence of this Project (i.e., defining Project activities and impacts)? How can it be avoided?
- Evaluation of Potential Risks and Impacts: Will it have a beneficial or adverse effect? How big is the change expected to be? How important will it be to the affected receptors? What are the contextual risks?
- Mitigation: If the impact is of concern, can anything be done to avoid, minimize, or offset the impact? Or to enhance potential benefits?

# **CHAPTER TWO: PROJECT DESCRIPTION**

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## 2.1 Project Components

The project will be implemented by the Iraqi Ministry of Youth and Sports(MoYS). The project will consist of the following three (3) main components:

### **Component 1: Supporting skills development for micro-entrepreneurship in the CCI sector**

[Sub-component 1.1: Life and social skills, and technical and vocational trainings to increase local engagement employability and micro-entrepreneurship in the CCI sector.](#)

This sub-component will provide life and social skills training to at least 2,000 vulnerable youth and women in Mosul. The training activities will be implemented by the MoYS PMU with the support of a contracted local service provider. The sub-component will build on the successful achievements of the Youth Livelihoods Training activity in the first JSDF pilot, which was the flagship activity of the previous project and reached 100 percent of the target number of beneficiaries. However, unlike the previous pilot, this pilot will test and tailor soft-skills trainings to mixed groups of conflict-affected, returnees and host community youth, so as to enhance the peacebuilding dimension of the activities. To reflect the specific context of the Nineveh governorate, the type of soft-skills training will also be adjusted to emphasize even more on emotional coping skills (managing stress, feelings, and moods) and social/interpersonal skills, as opposed to the more traditional employability focus. In addition, the trainings will include a mixed set of engaging activities such as leadership, decision-making, communications training, arts, cultural heritage and sports, community-based events, and group based psychosocial support. The vocational trainings will prepare the youth to entrepreneurship opportunities with a focus on a range of local occupations in the cultural and creative industries sector, ranging from visual arts, crafts and intangible cultural heritage (e.g. handicraft, cobbling, tailoring, jewelry, culinary traditions, management of heritage sites, etc.) to design and creative services such as housing-related industries (e.g. furniture, lighting, or home textile).

Following the successful completion of this sub-component, participants will be eligible to apply to the youth-led community development and/or the micro-entrepreneurship activities.

[Sub-component 1.2: Start-up support for developing youth micro-entrepreneurship in the CCI sector.](#)

The start-up support will be provided in a form of matching grant where at least 1,000

eligible beneficiaries would be required to match a minimum percentage of the grant value with in-kind and/ or financial contribution so as to create a greater sense of ownership, therefore increasing the chances of micro-entrepreneurship success with sustained results beyond the project.

Prior to benefit from the micro-entrepreneurship support, beneficiaries would have been required to: (i) complete the soft skills and vocational trainings under sub-component 1.1; and (ii) prepare and submit a business plan for the micro-entrepreneurship activity, while ensuring it proposes to support a socially and environmentally sustainable, and economically viable business activity. The start-up support will be granted according to the feasibility and prospects for successful implementation of the micro-entrepreneurship proposal. Moreover, proposals that would bring two or more young candidates together would be prioritized and encouraged as it will lead to cost-efficiency, contribute to mutual learning and teamwork, therefore increasing the survival rate of the business activity. A gender sensitive lens will be applied to ensure differentiated needs of vulnerable young men, women and the disabled are taken into account.

## **Component 2: Fostering civic engagement through local cultural community development initiatives**

This component will finance youth and women-driven community development initiatives in the host communities by engaging at least 1,000 young beneficiaries to optimize the results of enterprise and skills development.

As underlined in the 2021-UNESCO- World Bank framework on Cities, Culture and Creativity, cultural and creative industries contribute to social cohesion at the neighborhood level, enable creative networks to form and advance innovation and growth, create opportunities for those who are often socially and economically excluded. The approach across sectors and localities will encourage those supported to reflect on the needs of their communities, and collectively design initiatives that address them. With regards to local cultural initiatives, the activities will complement ongoing similar initiatives such as: the Revive the Spirit of Mosul initiative led by UNESCO with a focus on heritage, education and cultural life.

Young participants would be eligible provided that they participated in the soft skills trainings, following which they will be trained on how to design and implement local cultural community projects. Each group will then be required to complete a small sub-project, to support an activity serving the community needs. The same youth should participate in the implementation of the activity, while ensuring it brings different social groups together. Activities will not involve rehabilitation of cultural heritage sites, but will place an emphasis in empowering cultural heritage given the

positive impacts on social cohesion and in reviving Mosul's identity and cultural heritage pride after the devastating conflict. Activities promoting cultural heritage could include cultural exhibitions and events targeting youth and women in the various occupations related to the intangible cultural heritage (handicraft, culinary traditions, history of heritage sites, etc.), cleaning of streets located near cultural heritage sites, awareness raising forums in relation to cultural heritage, etc.

### **Component 3: Project Management**

This component will support the following activities: (i) project management for the coordination and implementation of activities including some operating costs; (ii) project monitoring and evaluation activities; (iii) preparation of the final evaluation report including lessons learned; (iv) environmental and social risk management; (v) participatory evaluations; and (vi) annual audits.

## **2.2 Project Beneficiaries**

The direct project beneficiaries are the young men and women, aged 15 - 29, who are forcibly displaced, returnees, and from the host community. Regarding the forcibly displaced category, attention will be paid to ensure it includes the most vulnerable who are not currently receiving humanitarian support with regards to their status (e.g. Internally Displaced People (IDPs) or refugees in camps who are already benefitting from UNHCR support). Target beneficiaries will be the most disadvantaged segments of the youth population who are vulnerable to poverty and long-term unemployment, and with least fifty percent being young women. Programming will be adjusted to meet needs and priorities of women and of the disabled, who will be encouraged to participate in the project.

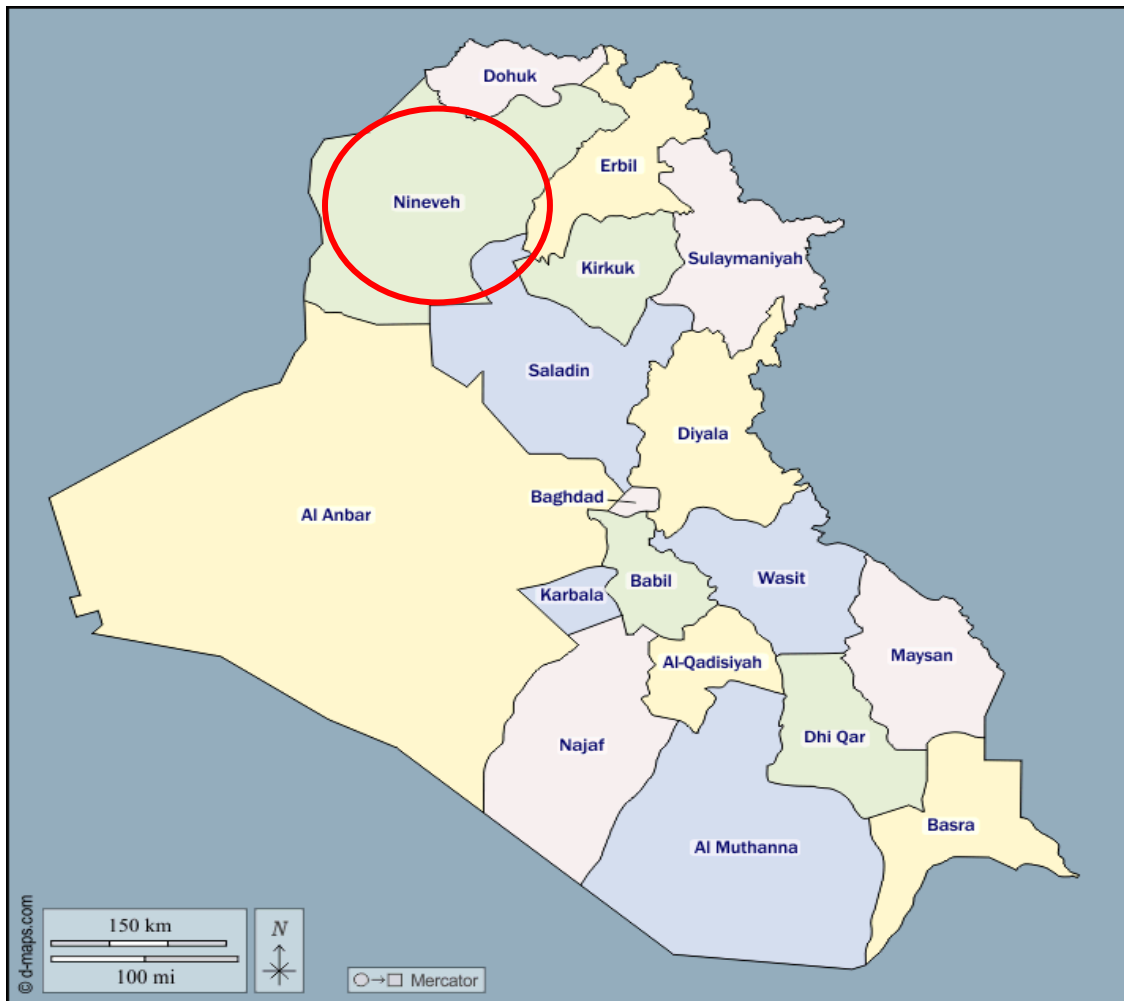
Local communities will benefit through the youth-driven cultural community activities and from the increased youth incomes supported by the micro-entrepreneurship activities. Local communities will actively be consulted and participate in the design of local cultural community activities selected for support.

## **2.3 Project Location**

Nineveh Governorate is a governorate in northern Iraq. It has an area of 37,323 km<sup>2</sup> (14,410 sq mi) and an estimated population of 2,453,000 people. Its largest city and the provincial capital are Mosul, which lies across the Tigris river from the ruins of ancient Nineveh. Before 1976, it was called Mosul Province and included the present-day Dohuk Governorate. The second-largest city is Tal Afar, which had an almost exclusively Turkmen population. An ethnically, religiously, and culturally diverse region, it was partly conquered by ISIS in 2014. Iraqi government forces retook the city of Mosul in 2017.



Mosul has been severely ravaged by the war and occupied by ISIS during 2014-2017, and despite ongoing efforts for reconstruction, most of the area still lies in ruins. Furthermore, the COVID-19 pandemic has diverted the funding from donors towards related emergency support, which has significantly slowed down recovery efforts in the Mosul area.



**Figure 1. Project Location**

**CHAPTER THREE:  
LEGISLATIVE AND  
INSTITUTIONAL  
FRAMEWORK**

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This section highlights the key World Bank and National environmental and social requirements likely to be relevant to the project. Applicability of the various requirements should be reassessed upon detailing the design of the project and its activities. Furthermore, the GoI has signed and ratified a number of international conventions which are, therefore, considered an integral part of the environmental legislative framework of Iraq. Where relevant, the national requirements are compared against the WB Group Environmental, Health, and Safety Guidelines referred to as the EHS Guidelines. These are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). They contain the performance levels and measures that are normally acceptable to the WB Group.

The project has been classified as a Moderate Risk” project; meaning that the potential impacts of the project are less adverse & more limited, fewer, site-specific, likely reversible and mitigation measures can be more easily designed/implemented.

The ESMF shall comply with the Environmental and Social standards of the World Bank (WB) as well as relevant national requirements. The relevant levels or measures of the EHS Guidelines or the national requirements, whichever is more stringent, will be applied.

### **3.1 National Legislations and Regulations**

The Iraqi laws and regulations that are relevant to the projects are as below, these regulations are relevant cause the proposed activities are expected to have potential impacts and risks on the aspects linked to these regulations:

#### **Law no. 27 for the year 2009: Protection and Improvement of Environment**

The law aims at protecting and improving the environment through mitigating existing damages or damages likely to be caused. The Law necessitates the provision of the Environmental Impact Assessment (Article 18) for any new developmental sub-project in the country. The Law addresses the issues of regulation of air pollution and

noise reduction, discharge of wastewater effluents, protection of soils, biodiversity conservation, management of hazardous waste, etc. Moreover, the law specifies the punitive measures for violation of the specified regulations.

**Law no. 37 for the year 2008: The Ministry of Environment**

This Law was legislated to define the institutional arrangements of the Ministry of Environment. It outlines policies and roles and responsibilities towards protecting the environment.

**Noise**

**Law No. 41 for the year 2015: Noise Protection and Control**

This Law identifies maximum permissible noise limits during day and nighttime for industrial, commercial and residential zones as follows

**Table 1. Noise limits for different working zones**

Working zones	Limits (dBA)	
Industrial	70	65
Commercial	65	60
Residential	55	45

**Air Quality**

**Regulation No. 4 for the year of 2012: Ambient Air Quality**

This regulation aims to protect ambient air quality and to control sources of pollution. The regulation necessitates that source emitting air pollutants abide by national limits and use monitoring equipment to ensure compliance with standards. It also

prohibits the burning of all types of wastes indoors or in open air, or next to a residential region or near water bodies.

## **Waste Management**

### **Instructions no. 2 of 2014 on Environmental Protection from Municipal Waste:**

The instruction aims at protecting the urban environment with a proper management of wastes, such as solid materials, recyclable and non-recyclable derived from domestic, commercial and professional activities, from the cleaning of streets, gardens, farms and public places, and construction waste.

**Directive No. (67) of 1986 Regulating the Debris Collection Areas:** debris disposal should be done in areas with stable geology and avoid sitting near particularly vulnerable or sensitive ecosystems and groundwater and surface water resources.

## **Water Resources**

### **Law no. 50 of the year 2008:**

The Law provisions for establishing the Ministry of Water Resources and creating the legal and technical framework for institutionalization of water resources management in the country.

### **Law no. 89 of the year 1981, amended by Decree No.54 of 2001: Public Health**

In addition to addressing various issues related to the population's health, the Law stipulates the provision of the safety of drinking water and drinking water quality standards.

## **Law no. 2 of the year 2001: Water Systems Protection**

Chapter 4 provides instructions on disposal or recycling of wastewater. It also prohibits the discharge of effluent into public water, unless it meets the criteria and specifications set out by the Environment Protection and Improvement Directorate (EPID). EPID is also allowed to issue environmental restrictions pertaining to the quality of public water as well as the quality of water discharged into public water, sewage systems, or rainwater.

## **Act no. 25 of the year 1967: The Regulation for the Protection of Rivers**

The act regulates wastewater discharges and provides physical, biological, and chemical guidelines for water quality. Also, the regulation sets forth provisions for protection of public water bodies from pollution.

## **Occupational Health and Safety**

### **Instructions No. 12 of the year 2016: Occupational Health and Safety**

These instructions provide guidance on Occupational Health and Safety (OHS) Procedures to be adopted.

### **Law No. 6 of 1988 concerning the National Commission for Occupational Hygiene and Safety, governing the enforcement of OHS regulations**

The Law provides for inspections of places of employment and inspections reports. It establishes the duties and responsibilities of employers regarding OHS, the functions duties of workers with respect to OHS.

## **Cultural Heritage**

**The Constitution of Iraq** provides a strong protection of all national culture, heritage, quote “Preserving antiquities and heritage in the Republic of Iraq as one of

the most important national wealth. Second - Uncovering antiquities and heritage, and introducing them to citizens and the international community, in order to highlight the distinguished role of Iraq's civilization in building human civilization. (Article no. 1) forbidden of establishing polluting industries or public health in areas that are less than (3) three kilometres from archaeological sites and heritage buildings on each side. (Article no.15).

**Antiquities and Heritage Law No. (55) of (2002)** Some believe that this law is the best among the Iraqi laws, as it is an inclusion of the rules of international law, and it was developed to be in line with international and Arab covenants and in line with the conditions that the country went through. This law came to achieve a set of goals that were not achieved by previous laws, the most important of which is the preservation of antiquities, heritage and historical sites, which are considered among the most important national treasures in Iraq. In building human civilization, and working to temporarily display heritage materials in foreign museums to see the manifestations of this ancient cultural heritage.

**The (2002) Law, in respect with Article No. (9)** The concerned authorities are obligated to preserve archaeological, heritage and historical sites when setting up public industrial, agricultural and housing projects, town and village planning projects, and road paving projects by obtaining written approval for that from the antiquities authority before preparing these projects or when changing them. In another hand, and in accordance with point four, when the implementation of any project of paramount importance in the development plan conflict with an archaeological site, the archaeological authority undertakes the excavation at the expense of the project executing agency during a period appropriate to the excavation, and the excavation costs are included in the project's allocations in advance.

**The law amended by Law No. (2) of (2010) and Law No. (50) of (2015)** aims to encourage investments and transfer modern technologies to contribute to the Iraqi development process, and encourage the Iraqi, foreign and mixed private sectors to invest in Iraq by providing the necessary facilities to set up investment projects, and protect their rights.

**Iraqi accession law to the UNESCO Convention on the Protection of the Intangible Cultural Heritage** The term “intangible cultural heritage” means the practices, perceptions, expressions, knowledge, and skills - and the instruments, objects, artefacts and cultural spaces associated with them - that communities, groups, and sometimes individuals consider as part of their cultural heritage. This intangible cultural heritage, inherited from generation to generation, is continuously recreated by groups and groups in accordance with their environment and interactions with nature and its history. Only intangible cultural heritage that is compatible with existing international human rights instruments, and with the requirements of mutual respect among groups, groups and individuals and sustainable development shall be considered for the purposes of this Convention.

**Law of the Ministry of Tourism and Antiquities No. (13) for the year (2013)** In this law, the Iraqi legislator has placed the responsibility on the Ministry of Tourism And the antiquities and the administrative bodies affiliated with them with the task of managing heritage facilities in a manner that ensures the achievement of the goals, the necessity of identifying archaeological and heritage areas, conducting excavations and protecting them, and establishing modern museums to introduce the cultural and natural heritage of Iraq. According to this law, the administrative authorities must activate their role in developing heritage plans and studies that are compatible with the social and civilized situation of Iraq, and develop heritage and archaeological cooperation relations between Iraq and the countries and



organizations concerned with the protection of heritage and antiquities and strive to restore Iraq's stolen heritage in coordination with the relevant international bodies

**Ministry of Environment Law No. (37) of (2008)** One of the most important goals that the Environmental Law seeks to achieve is to preserve public health, natural resources, biodiversity, cultural and natural heritage in a manner that ensures sustainable development and international cooperation. As the protection of the cultural and natural heritage is one of the main objectives that the Ministry of Environment seeks to achieve, by following effective administrative procedures represented in preparing regulations and issuing administrative decisions related to environmental determinants that will preserve the cultural and natural heritage, as well as in coordination with the ministries

**Environmental Protection and Improvement Law No. (27) of (2009)** Developed with the intention of activating the role of the administrative authorities in protecting and improving the environment by removing pollution, treating the damage that occurs to it and preserving public health, natural resources, biodiversity and cultural and natural heritage. This is achieved in cooperation with the relevant competent authorities, whether at the national or international level.

**Resolution No. (76) of (1994)** It is considered one of the most important decisions that deterred the issue of transgressing the cultural heritage by smuggling antiquities and heritage materials, as this decision addressed the process of smuggling antiquities and imposing the death penalty on anyone who tries to extract archaeological and heritage materials. This decision represents a legal basis for activating the role and authority of the administration in implementing it, in order to preserve the cultural and natural heritage.

**Decision No. (81) of (1994)**, Issued to address the phenomenon of abuses on real estate heritage sites by encroaching through housing, farming or building construction in heritage sites, and this decision imposed a penalty of imprisonment for a period of no less than one year and required the transgressor pays compensation to the Antiquities Administrative Authority equal to twice the value of the material and moral damage he causes.

**The 2005 constitution** laid a constitutional basis for the protection of all monuments and heritage buildings, as he enumerated antiquities, archaeological sites, heritage buildings and manuscripts Coins are among the important national treasures that fall within the jurisdiction of the federal authorities. Because of the importance of this heritage, the constitutional legislator stressed the need for cooperation between the authorities in its management The federal authorities and the authorities of the regions and governorates that are not organized in a region and pointed to the need to organize the protection of antiquities and heritage and its preservation by law.

**The constitutional legislator has included a text in 2005** constitution that was not mentioned previously, which is the text of (Article 10) in which all holy shrines and shrines are considered Religious shrines in Iraq are civilized entities, which the state's administrative authorities are obligated to protect and maintaining its sanctity, and this is in line with the general trend, whether at the national or international level Considering antiquities, heritage and religious shrines from archaeological and heritage funds.

**General Authority for Antiquities and Heritage Law No. (45) of (2000)** The Iraqi legislator, according to Law No. (45) of 2000, stipulated the establishment of the General Authority Antiquities and Heritage, which is an administrative authority currently linked to the Ministry of Culture, Tourism and Antiquities, and this body enjoys legal personality and financial and administrative independence in order to enable it to manage legal and material affairs and actions aimed at protecting cultural

and natural heritage. This authority has replaced the Department of Antiquities and Heritage, which was abolished under (Article 9) of this law, and all the employees of this department, all rights and obligations, were transferred to the General Authority for Antiquities and Heritage.

**Land Rights Settlement Law No. (50) of (1932) (Article 7)** A - The lands are of the type of owned lands if they are registered in the title deed in this manner, or if the person disposing of them possesses documents or evidence sufficient to prove that they are his property. B - The owned lands shall be registered in the name of: 1 - The person whose name is registered in the “Tapu” records or 2 - a person who presents documents considered sufficient to prove that he received their ownership from the person in whose name it is registered in the records “Tapu”. Or 3 - The person who presents documents or evidence justifying the cause of its consequences in his name.

**The constitution, in Article (35)**, obligates the state authorities to take care of the civilized and cultural aspect (For Iraq and the management of institutions and cultural activities in proportion to the history of this civilized country) This represents a constitutional basis for the administration's authority to nurture and manage cultural institutions and activities It aims to protect the cultural and natural heritage

### **Labour Laws**

Iraq recently enacted Law 37/2015 (the Iraqi Labor Law), which governs employment relationships in most of Iraq. To date, no known reforms are being considered for Iraq. In addition to this law, the respective government ministries may issue instructions or regulations that affect employment law. The law covers all aspects of employment, including:

- the definition of ‘workers’;

- hiring and termination;
- health and safety;
- leave;
- wages;
- collective bargaining; and
- avenues for complaints and redress.

The law distinguishes foreign workers from Iraqi workers, but all workers must be fully documented in order to legally work in Iraq. The Iraqi Labor Law does not distinguish between employees and contractors. The law applies to all ‘workers’, which is anyone working under the supervision of an employer in return for a wage. The law does distinguish between permanent work and work for a defined period, but there are certain requirements that must be met under the law in order to ensure that a contract for a determined period does not convert to a permanent contract.

Furthermore, in regard to child labour, Article 6, Chapter 3 of Iraqi Labour Law, states that the minimum age for employment is 15 years old. However, Iraq is also signatory to the 1989 International Convention on the Rights of the Child, which defines everyone under the age of 18 as a child who must have special protection and care.

### **3.2 World Bank Environmental and Social Standards (ESSs)**

Since October 2018, all WB funded Investment Project Financing (“IPF”) operations are required to follow the Environmental and Social Framework (“ESF”), as a means of better managing E&S risks of projects and improving development outcomes. The ESF consists of ten Environmental and Social Standards (ESSs), which sets out the E&S requirements and responsibilities of the borrowers throughout the life cycle of the project, including the identification and assessment of E&S risks and impacts associated with the Project. The Bank has undertaken an initial screening of the proposed Project activities to determine the Environmental and Social Risk Classification (ESRC) of the Project and to identify the specific ESSs that are relevant

to the Project. Based on the initial screening, the Environmental risk is rated as **Moderate**, the social risk is rated as Moderate as well. The overall Environmental and Social Risk of this Project is rated as Moderate. The initial screening process has also established that five of the ten ESSs are relevant to this Project. The World Bank Environmental and Social Standards (ESSs) with their relevance to the current project activities are summarized in the table below. The requirements for each ESS can be found in the respective Guidance Notes at <https://www.worldbank.org/en/environmental-and-social-framework/environmental-and-social-standards>. A full list and brief description of the ESSs are included in Annex 4.

The World Bank Environment and Social Framework (ESF) sets out the requirements of the 10 ESSs. The ESS8 requires borrowers to prepare a Cultural Heritage Management Plan (CHMP) as mechanism to protect and prevent loss or damage of tangible and intangible cultural resources throughout the hold project life cycle. The ESS8 defines tangible cultural heritage to include movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. The World Bank recognizes that the development projects it finances should avoid or mitigate any impact on sites or objects with historical, religious, aesthetic, or other cultural significance.

- **The legal framework in Iraq is broadly consistent with the Bank’s ESS8**, particularly Iraqi accession law to the UNESCO Convention on the Protection of the Intangible Cultural Heritage However, the national framework does not fully match the requirements of ESS8 in the following aspects:
  - The legal framework deals mainly with tangible cultural heritage, and is less concerned with intangible cultural heritage;
  - The legal framework does not include ESS8 requirements for stakeholder consultation and commercial use of cultural heritage.

- **This CHMP has been prepared to address these gaps.** The CHMP covers the different cultural spaces, tangible and intangible, for indigenous communities. These spaces include ancestral lands, forests, pasture, residential and agricultural lands, hunting grounds, worship areas, and lands no longer occupied exclusively by indigenous cultural communities but to which they had traditional access, particularly the home ranges of indigenous communities who are still nomadic or shifting cultivators.
- **The ESS8 requires to borrower to conduct consultation with stakeholders as per ESS10** that are relevant for cultural heritage that may be affected by the project, including project affected parties and other interested parties including different local and indigenous tradition bearers who may have different interests in, or attach different significance to, the community's cultural heritage. The consultation will be conducted in accordance with ESS10 of the ESMF for YICCI project. Carry out meaningful consultations to identify cultural heritage that may be affected by the project, consider its significance, assess risks and impacts, and explore avoidance and mitigation options. The consultations will have to maintain confidentiality where necessary, including respecting traditionally confidential information.
- **Under the World Bank's ESS8, cultural heritage protection is expected to require a sequence of steps** including screening, collecting baseline data, developing terms of reference, impact assessment, and formulating mitigating measures and a management plan. The CHMP provides guidance on this process for the YICCI.

**Table 2. Summary of the WB ESSs relevance to the project**

World Bank ESS	Relevance
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Relevant
ESS2: Labor and Working Conditions	Relevant
ESS3: Resource Efficiency and Pollution Prevention and Management	Relevant
ESS4: Community Health and Safety	Relevant
ESS5: Land Acquisition	Not Relevant
ESS6: Biodiversity Conservation	Not Relevant
ESS7: Indigenous Peoples	Not Relevant
ESS8: Cultural Heritage	Relevant
ESS9: Financial Intermediaries	Not Relevant
ESS10: Stakeholder Engagement and Information Disclosure	Relevant
Is there any territorial dispute between two or more countries in the subproject and its ancillary aspects and related activities?	Not Relevant
Will the subproject and related activities involve the use or potential pollution of, or be located in international waterways?	Not Relevant

The project's activities will result in environmental and social risks and impacts which will need to be assessed, managed and monitored (ESS1) in order to achieve environmental and social outcomes consistent with the ESSs. Further, the project will involve project workers (Academic staff, researchers, technicians), hence the Borrower should promote sound worker-management relationships and enhance the development benefits of the project by treating workers in the project fairly and providing safe and healthy working conditions (ESS2).

The project is a community project and will involve the youth community both men and women in Nineveh province.

There are several stakeholders involved in the project. Hence, the importance of open

and transparent engagement between the Borrower and project stakeholders is an essential element of good international practice (ESS10). 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.

### **3.3 World Bank Group EHS Guidelines**

The WBG EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). They contain the performance levels and measures that are normally acceptable to the WB Group. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. The relevant EHS<sup>1</sup> guidelines ([www.ifc.org/EHSguidelines](http://www.ifc.org/EHSguidelines)) are listed below:

#### **Environmental**

- Energy Conservation
- Water Conservation
- Waste Management

#### **Occupational Health and Safety<sup>2</sup>**

- Physical Hazards
- Biological Hazards
- Personal Protective Equipment (PPE)
- Monitoring

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<sup>1</sup> <https://www.ifc.org/wps/wcm/connect/29f5137d-6e17-4660-b1f9-02bf561935e5/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES&CVID=nPtguVM>

<sup>2</sup> <https://www.ifc.org/wps/wcm/connect/1d19c1ab-3ef8-42d4-bd6b-cb79648af3fe/2%2BOccupational%2BHealth%2Band%2BSafety.pdf?MOD=AJPERES&CVID=nPtgxyx>



### **Community Health & safety<sup>3</sup>**

- Structural Safety of Project Infrastructure (i.e. university/ center)
- Traffic Safety
- Disease Prevention
- Emergency Preparedness and Response

### **3.4 GAP Analysis Between Iraqi Law and WB Requirements**

The Sub-projects are required to comply with relevant national and international requirements and standards which contain the performance levels and measures that are normally acceptable and applicable. When host country regulations differ from the levels and measures presented in the WB EHS Guidelines, Sub-projects are expected to achieve whichever is more stringent.

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<sup>3</sup> <https://www.ifc.org/wps/wcm/connect/eeb82b4a-e9a8-4ad1-9472-f1c766eb67c8/3%2BCommunity%2BHealth%2Band%2BSafety.pdf?MOD=AJPERES&CVID=nPtgxTd>

**CHAPTER FOUR:  
ENVIRONMENTAL AND  
SOCIAL BASELINE  
CONDITIONS**

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## **4.1 General project location**

The project consists in supporting the socio-economic inclusion of the vulnerable youth in Mosul, aged 15-29 years old, who are forcibly displaced, returnees or from the host community. Mosul has been severely ravaged by the war and occupied by ISIS during 2014-2017, and despite ongoing efforts for reconstruction, most of the area still lies in ruins. Furthermore, the COVID-19 pandemic has diverted the funding from donors towards related emergency support, which has significantly slowed down recovery efforts in Nineveh Province in the north of Iraq.

## **4.2 socioeconomic profiles of intended eligible beneficiaries**

### **4.2.1. number of total eligible beneficiaries who meet these criteria in Mosul**

The Project Development Objective (PDO) is to (i) promote the social and economic inclusion of vulnerable youth (aged between 15 and 29) and women in Mosul through the Cultural Creative Industries (CCI) sector, and (ii) foster civic engagement through local cultural community development initiatives.

To achieve its objective, the project will seek to: (i) enhance the employability of the beneficiary population in Mosul through the provision of technical, life and soft skills development training in the CCI sector; (ii) increase entrepreneurship support (financial and technical support) to self-employed youth and women, micro and small businesses in the CCI sector; and (iii) engage youth and women in the design and roll-out of local cultural initiatives to support community cohesion in Mosul.

PDO level indicators will include:

- Number of direct beneficiaries. Target: 2,000, of which at least 50% of young women.
- Number of youth-led community development initiatives. Target: 50.

- Number of young men and women supported to design and lead civic engagement initiatives. Target: 1,000, of which at least 50% are young women.
- Number of youth business enterprises in the CCI sector supported: 330.

### **4.2.2 Demographics**

Mosul city has experienced large-scale displacement, especially of its minority groups long before the current wave of displacements inflicted by ISIL. While accurate statistical data on the city's ethnoreligious composition is lacking, it is assumed that the city has always comprised of a majority Arab population (around 80 per cent), followed by Kurds, Christians, Turkomans, Shabak, and Yazidis. After ISIL gained control many of the city's remaining religious and ethnic minorities fled.

Despite the mass exodus inflicted by ISIL, it is assumed that the city's population has not changed substantially from pre-ISIL figures, because of the parallel inflow of rural migrants and IDPs from other parts of Nineveh, Salaheddin and Anbar Governorates, Syrian refugees, and ISIL fighters and their families.

### **4.2.3 Living conditions**

While Nineveh is among the governorates with highest poverty rates, Mosul has always been a prominent commercial centre. Recent data on poverty in Nineveh Governorate is unavailable; however, the Iraqi Ministry of Planning asserts that poverty rates in governorates seized by ISIL have significantly increased as a result of escalating unemployment levels.

Despite lack of sufficient statistical data, there is palpable evidence that the living conditions of those who stayed in Mosul city have dramatically declined after July 2015, when governmental salaries were cut to deprive ISIL of the financial resources it deducted from staff salaries. This reduced the cash flow available in the city and led to a cutback in people's purchasing power. Up to 70% of the displaced live in unfinished buildings, mud houses or assembled housing, often with unsafe roofs,

doors and windows. A lack of insulation exposes the families to extreme weather in winter and summer.

#### **4.2.4 Poverty**

The poverty rate in the Nineveh province has nearly doubled in the last six years while it has decreased in Iraq generally.

According to the latest statistics of the Iraqi Ministry of Planning, poverty rate in Nineveh has reached 37.7 percent, which is higher than the rate that was published before the ISIS takeover of the city in 2014.

ISIS took over Mosul in Jun 2014 and ruled the city for three years. Mosul liberation devastated the town, causing a significant number of people to lose their jobs and hardly afford their living expenses. However, The United Nations warned that one out of every four Iraqi children lives in poverty and need help.

#### **4.2.5 Unemployment Rate**

Statistics from Nineveh province, of which Mosul is the capital, say unemployment is around 40 percent generally and 20 percent for those aged 24-45.

Joblessness is similarly high elsewhere in the country which is trying to move past decades of war but is hobbled by corruption and other problems which sparked a youth-led protest movement in 2019.

In another hand, in the majority of the neighborhoods assessed, around 20 - 30 % of the people surveyed reported having jobs; the remainder are unemployed. It was reported that the large majority (80%) of people are working for others, often as daily labourers and paid on a daily basis, whilst about 20% work for themselves by running their own business. Community respondents reported that even those with qualifications (e.g. university degrees) are unable to find work and are resorting to daily labour. The most common forms of employment include masonry and

construction, shop assistants, working as small retailers selling food and other goods, taxi drivers, or working for the government. Wages are significantly reduced compared to before the conflict.

#### **4.2.6 Wages**

In general, post-conflict wages have dropped significantly in all neighbourhoods by at least 50%, and in some neighbourhoods, up to 75%. An average weekly salary reported prior to the conflict was around 100,000 IQD/ week (83 USD). In comparison, post-conflict income fluctuates on average between 30,000 IQD (25 USD) to 50,000 IQD/week (41 USD). There is also a significant difference in weekly salary estimates between men and women, with women on average reporting a weekly salary to be around 50,000 IQD less than the figures stated by men (however, this discrepancy relates to both before and after the conflict).

#### **4.2.7 Food Security**

Conflict has placed severe strains on the food security and infrastructure of Mosul and surrounding areas. Civilians remaining in the city lack safe access to food with the majority of the population reporting being unable to afford food and the need to resort to negative coping mechanisms. Early patterns show that IDP intentions are diverse and that many will not rely on camps; IDPs have left with few resources and nearby host communities are already severely strained.

#### **4.2.8 Education**

Analysis by NRC of school data from the current academic year shows that one in three schools in Mosul either need repair or are not fit for use, with 50 per cent of all students enrolled in schools with damaged structures.

Overcrowding and teacher shortages also represent some of the major obstacles to an adequate learning. In prefabricated schools, widely referred to as caravans, there

is only one teacher for every 51 students. There are instances of 80 children joining a classroom of only 15 square metres. It is common that a group of students share the same book, as the majority cannot afford stationery.

The conditions and families' economic situation are leading to higher dropout rates, which reached 20 per cent in one school. Separately, final exam results across 10 sixth-grade schools show a pass rate of only 22 per cent. In one of the schools in West Mosul, only 3.3 per cent of sixth-graders passed.

A clear split in future prospects was found in one of national organizations interviews with young men and women. Those in school or university, though a few years behind, said they aimed to finish their studies and get a job, mainly in medicine or engineering.

#### **4.2.9 Health Care**

Mosul once had the second-largest health care system in Iraq, but the situation is still far from what it used to be before the war. Because medical facilities were heavily damaged in the fighting, people still struggle to access affordable high-quality health care. The few functional facilities that remain are overburdened as people from throughout the region travel to seek care. The main hospitals have reopened in temporary structures, some of them far from their previous locations. This makes it harder for people to reach them as quickly as they could before the battle.

Almost five years after the city was officially declared retaken by Iraqi authorities, many medical facilities damaged in the fighting have yet to be fully renovated and are not fit for use. What has mainly been done is to [temporarily] install containers next to destroyed facilities until they are rebuilt. But the containers are often not properly equipped for receiving patients. Right now, especially [with] COVID-19, the needs are too big for hospitals in Mosul to handle.

On top of this, there are still shortages of medical supplies, and thousands of families in Mosul and surrounding areas still struggle to access quality affordable health care.

In response to the high level of unmet needs after the conflict, MSF opened a specialist maternity unit in West Mosul in 2017 to provide safe, high quality, and free health care for pregnant women and newborns. In July 2019, a second MSF team opened the Al-Amal maternity unit within Al-Rafadain primary health care center, also in West Mosul. Last year, MSF teams in both facilities assisted the births of almost 15,000 babies.

Iraq's Directorate of Health has set up dedicated health services in the city to provide care for survivors of gender-based violence. But stigma continues to prevent many women from seeking this care.

#### **4.2.10 COVID 19 Pandemic and the Economy**

The COVID-19 pandemic is causing further economic losses as the city has ground to a halt since the outbreak of the disease and associated containment measures. This is having a devastating effect on an already fragile struggling economy to recover after years of war. (100%) of daily labourers in Mosul have been affected by COVID-19 restrictions according to IOM. 83% have lost their jobs and face financial problems.

The most fragile populations are those working in small businesses and other informal jobs, they represent almost two thirds of the Iraqi workforce. Like many countries across the world, businesses were forced to shut down at short notice and in countries such as Iraq where the insurance sector or social safety nets are weak the impact of coronavirus could be catastrophic.



**CHAPTER FIVE:  
ENVIRONMENTAL AND  
SOCIAL IMPACTS/  
RISKS AND  
MITIGATION  
MEASURES**

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## **5.1 Positive Environmental and Social Impact Identification**

The project aims to expand economic opportunities and entrepreneurship programs for the disadvantaged youth, women and vulnerable communities including through life skills and vocational trainings and livelihood support, consistent with the World Bank Group twin goals of ending extreme poverty and promoting shared prosperity. The project is expected to have the following benefits and positive impacts:

- 1) support the economic and social inclusion of forcibly displaced, returnees and host community youth through skills development and activities promoting micro-entrepreneurship to reduce poverty among youth beneficiaries and to make creative and cultural goods and services more accessible for local communities in Mosul.
- 2) support youths' individual capacities to cope with conflict, providing them with valuable life and soft skills to promote resilience to trauma.
- 3) support community initiatives and engagement through the creative and cultural industries, aiming at enhancing social trust, social cohesion or peaceful coexistence between the displaced, returnees, and host community, therefore reducing the risks of conflict and instability
- 4) promote the social and economic inclusion of vulnerable youth (aged between 15 and 29) and women in Mosul through the Cultural Creative Industries (CCI) sector
- 5) foster civic engagement through local cultural community development initiatives.

## 5.2 Negative Environmental and Social Impact Identification

**Table below** entails environmental and social issues and potential negative impacts that are associated with the project during the **implementation phase**. All the impacts listed below are of low to moderate significance. The anticipated impacts are localized, and time limited. Mitigation hierarchy has been applied in order to avoid or minimize the impacts.

**Table 3. Environmental and Social Impact Identification during the Project Implementation Phase**

<b>Environmental and Social Impact Identification during the Implementation Phase</b>	
<b>Project Activity/aspect</b>	<b>Potential Negative Risk/Impact</b>
Beneficiary Selection phase	<ul style="list-style-type: none"> <li>- The potential social tension risk between project beneficiaries and non-project beneficiaries within the same community if the targeting mechanism is not transparent enough.</li> <li>- Exclusion of the vulnerable/disadvantaged groups and/or by unconscious discrimination</li> </ul>
Project Implementation	<ul style="list-style-type: none"> <li>- Community health and safety risks, in particular exposure to Covid-19 during training events.</li> <li>- Occupational health &amp; safety risks</li> <li>- Impacts of management and disposal of generated solid wastes and the wastes associated with the installation and use of electronic waste at the end of experiments and end of life of equipment, , in addition to non-hazardous waste, especially papers from workshops, training and meetings throughout the project duration.</li> <li>- Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH)</li> <li>- Inefficient consumption of water, energy and other resources.</li> </ul>

## **5.3 ESMF Implementation Arrangements**

### **5.3.1 Overall Project Institutional and Implementation Arrangements**

A well-defined institutional and implementation mechanism for identifying, appraising, managing and monitoring safeguards at all levels is a key necessity. This section lays out the roles, responsibilities of various parties and the due diligence process that will need to take place from the preparation of the investment through implementation completion.

MoYS as the government agency responsible for youth community in Iraq, will be the implementing agency for the proposed project. It has the oversight role of the Project's preparation and implementation. MoYS will provide technical guidance to the project implementation through its appropriate technical departments and will establish a Project Management Unit (PMU) to coordinate and manage project-related daily activities. Component 1- Component 3 will be implemented by MOYS in the different areas and sectors listed above in the city of Mosul . The PMU will play a liaison role with all the parties involved in the implementation. .The extent of environmental and social risks and impacts of this project are rather limited, and the required interventions are also expected to be simple and straightforward. To manage the anticipated impacts, E&S Specialist at MoYS is recommended to be assigned in the PMU to monitor the implementation of environmental and social aspects, to make sure that all E&S mitigation measures are correctly integrated and reported to the WB. As capacity of the MoYS in E&S matters is considered low, the ESCP will specify the E&S training requirements for MoYS, in building their capacity in managing environmental and social risks and impacts (in addition to technical and Financial Management/procurement expertise). Training and awareness raising on social and environment risk management will comprise topics such as Grievance Mechanism (GM), basic OHS including road safety measures, waste management, and stakeholder engagement.

### **5.3.2 Environmental, Social and Health and Safety Monitoring**

The PMU will be responsible of the environmental and social monitoring. Monitoring will be largely carried out in the form of regular site supervision by the responsible EHSS staff as mentioned above. Annex 1 describe the processes and procedures for preparing site specific ESMPs.

Monitoring of the different EHSS parameters will be conducted following the requirements specified in the ESMF. The overall project impacts will be monitored during project implementation through a number of selected indicators according to the project design, which reflect the project EHSS benefits. The project will support independent audits on a seasonal basis throughout the project implementation, through the provision of consulting services.

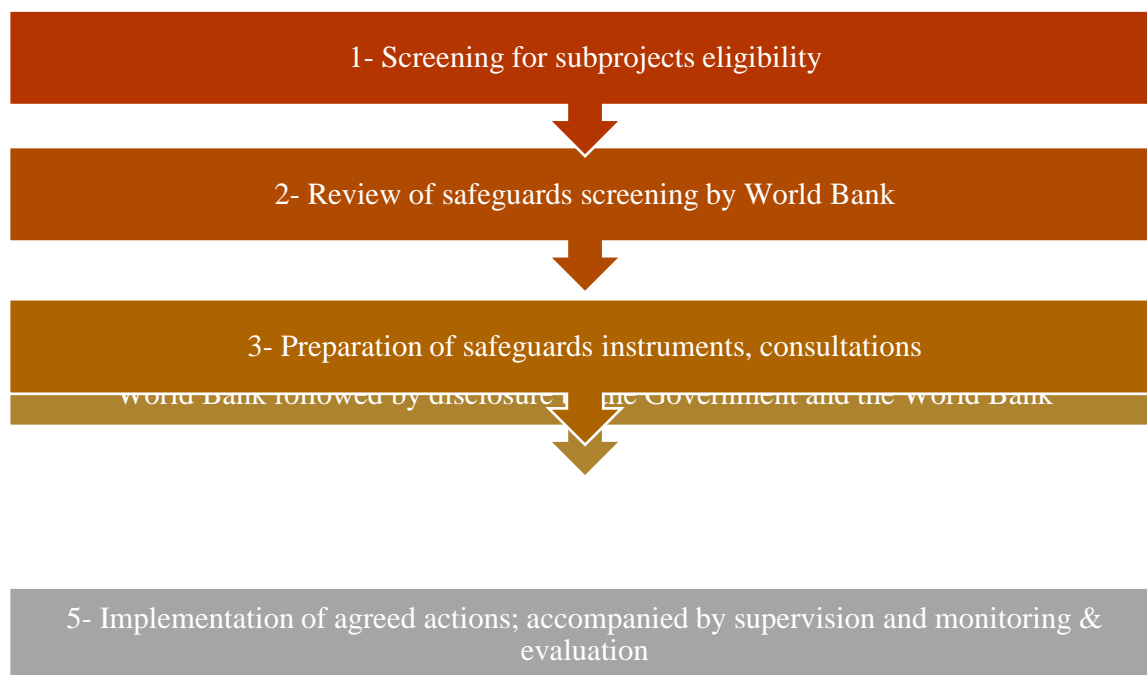
## **5.4 Procedures to Address Environmental and Social Issues**

### **5.4.1 Subprojects Screening and Approval Methodology**

This section sets out in details the procedures to be followed in identifying, preparing and implementing the project components including the following:

- Screening potential subprojects in relation to environmental and social eligibility.
- Determine the E&S instruments/plans that will be needed.
- Consultation and disclosure of E&S instruments.
- Review and approval of E&S plans and instruments by both the MoYS and the WB
- Disclosure both in-country and at the WB website
- Implementation and monitoring of E&S plans and instruments including the LMP, SEP as well as all the measures stipulated in this ESMF document.

The above procedures constitute a framework methodology for the screening, assessment, E&S instruments identification and development, review, approval, safeguarding, and monitoring of the E&S performance of the components of the project. The Bank will review the screening results and accordingly the relevant instruments shall be prepared, consulted with stakeholders and disclosed. Following clearance of the instrument by the MoYS, the project ESMP shall be implemented, supervised and monitored. The following Figure outlines the proposed methodology.



**Figure 2. Outline of the E&S Screening and Approval Methodology**

#### **5.4.2 Environmental and Social Screening.**

The objective of the screening criteria is to evaluate project activities with high ES impacts.

A Simplified **ESMP (Annex 1)**, based on the framework ESMP described in table 4 below serves as a guide for the project stakeholders when implementing site-specific simplified ESMPs and for monitoring the project implementation.

The E&S risks associated with the project labor and working conditions and their mitigation measures are discussed in detail in the project Labor Management procedures (LMP).

### **5.4.3 Capacity building and training needs**

Upon ESMF approval by the WB and adoption by the MoYS, it will be required that the following stakeholders undergo training on the ESMF requirements:

- ESHS specialists in PMU
- Staff and principals
- Environmental Specialist
- Staff involved with cleaning, housekeeping and waste collection and disposal/contracting with waste disposal companies.

ESMF Training will be customized to the roles of the various stakeholders to include:

- Sub-project screening
- Overview of the ESMF structure
- Implementation of mitigation measures including occupational health and safety measures and first aid & emergency response
- Implementation of monitoring measures
- Use of GM
- Code of conduct
- M & E templates, archiving and reporting
- Project data analysis, indicators and project improvements

In addition, worker training is needed to minimize incident risk and ensure compliance with ESMF/ESMP provisions.

The above training programs could be implemented as follows:

- An environmental as well as social development consultants are hired by PMU to prepare two virtual training materials covering all necessary topics for the successful implementation and monitoring of the ESMP, aimed for the PMU
- The PMU should in turn provide the necessary training for other stakeholders.

#### 5.4.4 ESMF Cost Estimate

Table below includes a preliminary cost estimate for the implementation of the project ESMF/ESMP

**Table 4. ESMF Budget**

Activity	Unit	Unit Rate in US\$	Quantity	Total in US\$
<i>1- E&amp;S Screening Process</i>	Included in the normal operation cost for the PMU			
<i>2- Cost of implementation of ESMF including site-specific ESMPs</i>				20,000
<i>3- Implementation of the GM</i>	Included in the normal operation cost for the PMU			
<i>4- Implementation of the SEP</i>				10,000
<i>5- Implementation of the LMP</i>	Included in the implementation costs of site-specific ESMPs			
<i>6- Management &amp; monitoring</i>	Included in the normal operation cost for the PMU			
<i>7- Environmental &amp; Social Consultant for capacity building such as (training materials, workshops, etc.) aimed for the PMU &amp; Staff</i>	Man-day	1000	2	2000
<b>Sub-total (1)</b>				<b>32,000</b>
<b>8- Contingencies (approx. 10% of total costs)</b>				
<b>Total Cost</b>				<b>35, 200</b>



**Table 5. Environmental and Social Impacts, Mitigation measures, and Monitoring during the project planning and implementation**

NO.	POTENTIAL IMPACT Category/Aspect	MITIGATION MEASURES	MONITORING PARAMETERS	RESPONSIBILITY	
				Implementation	Monitoring
1	<b>Waste Management</b>	<ul style="list-style-type: none"> <li>• Coordinate with the local authorities to identify the location of the final disposal site to be included in the simplified ESMPs.</li> <li>• Minimize waste generation on site and develop and adopt a simple waste management plan for specific waste streams as indicated below.</li> <li>• Waste collection and disposal/reuse/recycling options and sites will be identified for all major waste types expected .</li> <li>• Design a segregation system based on compatibility of different waste streams and based on the recycling services (if locally available).</li> <li>• General waste must be collected and transported to local council approved disposal sites.</li> <li>• Food wastes must be collected, and stored in closed waste containers located at project area considering health and hygiene issues, and disposed off-site through licensed contractors.</li> <li>• Storage, transport and handling of all waste types must be conducted in accordance with all legislative requirements, through licensed</li> </ul>	<ul style="list-style-type: none"> <li>• All mitigation measures have been implemented as described in the mitigation section</li> <li>• Records of type and amount of waste, Number of Environmental and OHS incidents related to waste collection and disposal.</li> <li>• Number of complaints related to waste management and time it took to solve them as well as number of unresolved complaints</li> </ul>	<p>Each s team submitting a proposal will be responsible for implementing all measures and for collecting the equipment at the end of life</p>	<p>-Monitoring will be done by each p team</p> <p>Regular supervision by the PMU Environmental and Social Specialists</p>

NO.	POTENTIAL IMPACT Category/Aspect	MITIGATION MEASURES	MONITORING PARAMETERS	RESPONSIBILITY	
				Implementation	Monitoring
		<p>contractors and in coordination with the local authority</p> <ul style="list-style-type: none"> <li>• Open burning of waste material is prohibited on site</li> <li>• Complete prohibition of solid and liquid waste dumping in any water body</li> <li>• Complete prohibition of solid and liquid waste dumping in any adjacent or near-by agricultural land, occupied and/or unoccupied land.</li> </ul>			
2	<b>Community Health and safety</b>	<ul style="list-style-type: none"> <li>• Implement all the measures related to waste management as indicated in Section 1</li> <li>• Adopt and implement the <b>SEP</b> prepared for the project, including clearly communicating the phone number/channels to receive grievances.</li> <li>• Adopt and implement a health management system for the staff to ensure through medical check-ups, that they are fit for work and that they will not introduce disease into local communities and within the working environment and their families. Regular inspection of staff and participants against communicable diseases (COVID-19) and provision of vaccination when needed.</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder Engagement Plan adopted and implemented</li> <li>• All mitigation measures have been implemented.</li> <li>• Number of community health and safety- related complaints received and the time it took to resolve them</li> <li>• Number of unresolved complaints</li> </ul>	<p>Each team submitted a proposal will be responsible for implementing all measures and for collecting the equipment at the end of cycle</p>	<p>Monitoring will be done by each team</p> <p>Regular supervision by the PMU Environmental and Social Specialists</p>

NO.	POTENTIAL IMPACT Category/Aspect	MITIGATION MEASURES	MONITORING PARAMETERS	RESPONSIBILITY	
				Implementation	Monitoring
		<ul style="list-style-type: none"> <li>Carry on an ongoing identification, evaluation and monitoring of potential community health and safety risks</li> </ul>			
3	<b>Labor and Working Conditions including Occupational health &amp; safety</b>	<ul style="list-style-type: none"> <li>Implement all measures and procedures as indicated in the LMP prepared for the project (chapter 8) including but not limited to: <ul style="list-style-type: none"> <li>Prohibit child labour and forced labour, relating to any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This prohibition covers any kind of involuntary or compulsory labor.</li> <li>Adhere to national law and LMP requirements with respect to working hours, rest periods, annual and sick leave, minimum wage, fair and clear contractual terms and conditions.</li> <li>Develop, adopt and implement the Worker GM as detailed in the LMP.</li> <li>Implement good international industry practices (GIIP) relating to labor standards and working conditions (in line with ILO Core Conventions) and national law as applied to equal opportunities and non-discrimination.</li> <li>The selection of staff will be based on the</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>All mitigation measures have been implemented.</li> <li>Workers right to work (including contracts, age etc.) and Inclusion of minimum labour standards in all workers contracts</li> <li>Reports on any accidents, hazardous events, as well as records and reports on health, safety and welfare of workers/staff</li> <li>Condition of fire extinguishing instruments</li> <li>Availability &amp; usage of PPEs for waste collection workers</li> <li>Condition of Rest Facilities</li> <li>% of site employees trained on OHS, code of conduct and emergency procedures and GRM</li> <li>OHS statistics such as injuries, and first aid cases.</li> </ul>	<p>Each team submitting a proposal will be responsible for implementing all measures and for collecting the equipment at the end of life</p>	<p>Monitoring will be done by each team</p> <p>Regular supervision by the PMU Environmental and Social Specialists</p>

NO.	POTENTIAL IMPACT Category/Aspect	MITIGATION MEASURES	MONITORING PARAMETERS	RESPONSIBILITY	
				Implementation	Monitoring
		<p>principle of equal opportunity, and there will be no discrimination with respect to any aspects of the employment relationship including but not limited to: recruitment requirements; training opportunities; termination of employment; inappropriate treatment or harassment including sexual harassment. Men and women will be given equal opportunities relating to all recruitment opportunities under the project. This will apply to hiring/assigning of all project workers. The health and safety risk on the workers should be covered with appropriate insurance schemes for all the types of workers. In addition, the insurance should be covering work related accidents (injuries and fatalities), as well as insurance for third party</p> <p>Train all staff/workers on GBV risks and related sanctions.</p> <p>Introduction of strict sanctions (e.g., dismissal) for staff/workers involved in any form of abuse, inappropriate behavior or GBV</p> <p><b>Occupational Health &amp; Safety</b></p> <ul style="list-style-type: none"> <li>• Ensure compliance with local and international</li> </ul>	<ul style="list-style-type: none"> <li>• Number of complaints received, number solved and the time it took to solve them.</li> <li>• Number of unresolved complaints</li> </ul>		

NO.	POTENTIAL IMPACT Category/Aspect	MITIGATION MEASURES	MONITORING PARAMETERS	RESPONSIBILITY	
				Implementation	Monitoring
		<p>guidance and codes of practice on Environmental Health and Safety (EHS) management.</p> <ul style="list-style-type: none"> <li>• For the staff in charge of waste collection (on site) and waste disposal (off-site): Provision of full Personal Protective Equipment (PPE) including suitable footwear to avoid slippage. Workers' PPE will comply with international standards and regulations (always hardhats, as needed masks and safety glasses, harnesses and safety boots). They must also be trained on how to use the PPE. Provision of appropriate training for Workers on health and safety issues will be provided in local language and will consider the local culture and level of knowledge, during an induction session and refresher sessions .</li> <li>• Provision of appropriate and enough first aid equipment, and fire extinguishers in good condition. Firefighting equipment will be placed in prominent positions across the project area where they are easily accessible. This includes fire extinguishers, a fire blanket as well as a water tank</li> <li>• Staff must be trained to recognize potential OHS hazards, use of proper work practices and procedures, recognize adverse health effects, understand the physical signs and reactions related to exposures, and are familiar with appropriate emergency evacuation procedures.</li> <li>• Preparation and adoption of an emergency</li> </ul>			

NO.	POTENTIAL IMPACT Category/Aspect	MITIGATION MEASURES	MONITORING PARAMETERS	RESPONSIBILITY	
				Implementation	Monitoring
		<p>response plan. Identify and provide contacts of closest authorities and emergency services to contact in case of emergencies</p> <ul style="list-style-type: none"> <li>• Prohibit smoking on site</li> </ul> <p><b>COVID-19 MEASURES</b></p> <ul style="list-style-type: none"> <li>• Follow latest WHO and national measures on Covid-19 as relevant.</li> <li>• Provision of medical insurance for staff covering treatment for COVID-19, sick pay for workers who either contact the virus or are required to self-isolate due to close contact with infected workers and payment in the event of death</li> <li>• Confirming staff are fit for work, to include temperature testing and refusing entry to sick staff</li> <li>• Training staff on hygiene and other preventative measures, and implementing a communication strategy for regular updates on COVID-19 related issues and the status of affected staff.</li> <li>• Treatment of staff who are or should be self-isolating and/or are displaying symptoms.</li> <li>• Adjustments to work practices, to achieve social distancing.</li> </ul>			

NO.	POTENTIAL IMPACT Category/Aspect	MITIGATION MEASURES	MONITORING PARAMETERS	RESPONSIBILITY	
				Implementation	Monitoring
		<ul style="list-style-type: none"> <li>Establish a procedure to follow if a staff becomes sick (following WHO guidelines)</li> </ul>			
4	<b>Resource Consumption</b>	Conduct awareness sessions in participating communities on resource efficiency with particular focus on energy and water efficiency.	Awareness sessions documentation	PMU- Environmental and social specialists	PMU

# **CHAPTER SIX: PUBLIC PARTICIPATION AND CONSULTATION**

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## **6.1 Approach and Objectives of Public Participation and Consultation**

Public participation aims to involve, inform and consult the public in planning, management and other decision-making activities. The key focus of meaningful consultation is equity and inclusivity; namely, the approach taken needs to ensure that all groups (including those that are disadvantaged or vulnerable) are embraced within the consultation process on equal terms, and that all groups are given the capacity to express their views with the knowledge that these views will be properly considered. Furthermore, public consultation is considered an ongoing process, was conducted throughout different stages of the ESMF preparation, through scoping sessions with key informant interviews via surveys and questionnaires. The public consultation process has the following aims:

- To inform Stakeholders about the proposed project and its objectives;
- Strengthen social acceptance of the project;
- Inform the concerned parties that the environmental and social impacts will be minimized to levels that are low as reasonably practical and achieve the balance between legitimate requirements for development and environmental protection;
- To inform stakeholders of Environmental and Social Impacts and their mitigation measures;
- To seek views, concerns and opinions of people in the area concerning the project;
- To integrate those opinions and concerns into the final alternative and mitigations measures, and;
- To establish if stakeholders foresee any positive or negative environmental impacts from the project and if so, how the impacts can be addressed.

## **6.2 Identification of Stakeholders and Methods of Consultation**

For the purposes of this stakeholder consultation session, the directors of sub projects and their teams in addition to the PMU and its environmental, social and technical specialists were asked to share their concerns, advice on mitigation measures to be put in place so as to minimize adverse impacts in respective sectors. Consultations have been conducted using a questionnaire comprising of 12 questions, which cover the different aspects of the project: environmental, social, health and safety aspects, and community health & safety. Participants were asked to give a score from 1 to 5 to each question/fact. A score of 5 indicates that they strongly agree and a score of 1 indicates that they strongly disagree. The survey questions are listed below:

1. The project will have multiple positive impacts on the local area.
2. The project will help providing job opportunities to local communities
3. The project will help promoting entrepreneurship and the creation of microenterprises
4. The project will improve students' skills, thus improving the quality of students.
5. All members of the local communities will benefit from the project
6. The expected environmental impacts of the project could nevertheless be easily mitigated.
7. The expected occupational health & safety impacts of the project are minimal and could be easily mitigated
8. Establishing a GM for the project is essential for both the community and workers
9. There will not be any damages whether permanent or temporary, which would affect the livelihood of the residents or cause loss of income due to the project activities?
10. From your understanding of the nature of the work, how far do you agree with that the project will not involve any permanent land acquisition?

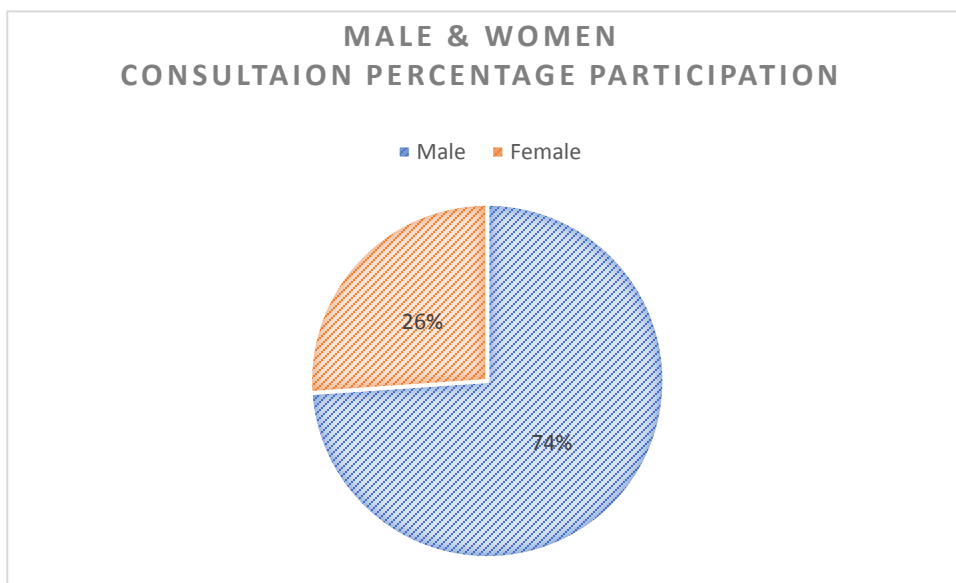
11. From your understanding of the nature of the work, how far do you agree with that the project will not involve any physical displacement of residents?
12. The project will not cause any social conflicts or changes in the demographics or social structure in the project area.” How far would you agree?

In addition to the response requested to the questions above, participants were given the chance to indicate any additional comments and/or concerns regarding the project. Annex 2a includes a copy of the questionnaire used in the consultation.

Table 6 shows the size of the sample interviewed and Figure 3 shows the gender profile of participants. The photo documentation is included in Annex 2b. there was 23 persons participated in the public Consultation activities.

**Table 6: Composition of the meeting population sample**

Governorate	Male	Female	Total
	17	6	23



**Figure 3. Representation of women and men during the Consultation activities**

### 6.3 Response of Participants

The questions and their analysis are listed in Table 7, the actual response is listed in Annex 2a.:

**Table 7. Survey results of the participants**

No.	Question	Comments of the response		
		Majority Strongly agree/ agree	Majority Strongly disagree/ disagree	Distributed
1	The project will have multiple positive impacts on the local area.	x		
2	The project will help providing job opportunities to local communities	x		
3	The project will help promoting entrepreneurship and the creation of microenterprises	x		
4	The project will improve youth skills, thus scaling up job opportunities.	x		
5	All members of the local communities will benefit from the project	x		
6	The expected environmental impacts of the project could nevertheless be easily mitigated.	x		
7	The expected occupational health & safety impacts of the project are minimal and could be easily mitigated	x		
8	Establishing a GM for the project is essential for both the community and workers	x		
9	There will not be any damages whether permanent or temporary, which would affect the livelihood of the residents or cause loss of income due to the project activities?	x		
10	From your understanding of the nature of the work, how far do you agree with that the project will not involve any permanent land acquisition?	x		
11	From your understanding of the nature of the work, how far do you agree with that the project will not involve any physical displacement of residents?	x		
12	“The project will not cause any social conflicts or changes in the demographics or social structure in the project area.” How far would you agree?	x		

## 6.4 Conclusions

The beneficiaries of the project have made it clear that its components are of great importance for the local community. Some suggestions were made aiming to refine the components so that they can best serve their goals.

## 6.5 Consultation Plan

Table below shows a summary of expected consultation activities during the different phases of the project (Refer to the project SEP for details)

**Table 8. expected consultation activities during the different phases of the project**

Project stage	Topic of Consultation	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
Preparation	Overall project design, description of activities of the project including working hours – hiring process and addressing specific needs for women	Depending on stakeholders (and COVID-19 status and considerations), the methods will vary between workshops, focus group discussions, virtual public consultations, surveys, and virtual meetings.	Premises of different entities at the central and local levels, as well as in public places	Associated ministries and agencies involved; Project affected and other interested parties	MoYS /PMU
	Environmental and social instruments (ESMF/ESMPs)				
	Environmental and Social commitment Plan, SEP, Labor Management Procedures				
Implementation	Consultations on sub-project details, ESF instruments (site-specific ESMPs) and grievance redress details(channels)	Workshops, focus groups, surveys, and public consultations	According to the timetable of the project, close to local locations where the project activities are taking place.	Governmental entities involved; Project affected and other interested parties	MoYS /PMU

Project stage	Topic of Consultation	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
	Updated SEP, ESCP, LMP as required		When the documents get updated; at premises of different entities at the central and local levels, as well as in public places and local councils	Governmental entities involved; Line Ministries; and donors	MoYS /PMU
	Training and capacity Building	Physical or Virtual Workshops (depending on COVID-19 considerations)	According to timetable of the project	Governmental entities involved and MOE directorates	MoYS /PMU /Project Consultants (if any)
Monitoring and evaluation	Progress reports	Participation to joint monitoring exercises Use of apps or digital solutions for user feedback Surveys Workshops, press conference	Continuous user feedback  Progress reviews every 4 months; mid-term review and end of project cycle	Beneficiaries and affected population; larger public	PMU; M&E Specialists; and governorates focal points

## 6.6 Grievance Mechanism

A project-level GM will be established to provide affected people with the avenues to file their grievances and seek resolution with no intimidation or coerciveness. Through providing a transparent and credible channel, it aims to build trust and cooperation with all parties involved, which is an integral component to enhance the Project's effectiveness. The GM will be aligned with specific project needs and be available throughout project implementation.

The specific objectives of the grievance procedures as follows:

To provide a process by which grievances from communities, groups, individuals, local authorities, NGOs and other local stakeholders can be processed efficiently, and constructively. The goal is to resolve grievances amicably and if possible, minimize the use of the legal system.

1. To offer individuals and groups with a way to express their grievances and problems in a rational and transparent manner and demonstrate the important role of stakeholders in program design and implementation.
2. To institutionalize a reporting system to take corrective action.
3. To establish a transparent relationship based on mutual respect with the communities and other local stakeholders.
4. To establish Project responsibility regarding grievances and establish a course of action to manage the grievances in a timely manner.

The GMs will be promoted as much as possible as part of a communication campaign and training will be provided to beneficiaries of the Project so they are aware of channels through which they could voice their grievances and complaints. It will be communicated to all stakeholders and remains operational throughout the Project life cycle.

All parties may issue grievances including any individual, local authority, NGO, community group, organization, company or other local stakeholder who is directly affected or who may have an interest in the Project, including activities, laws and regulation implemented. While considerable efforts have been made to include social and environmental risk management in the design and implementation of the Project in order to minimize and prevent potential adverse impacts, there is always a possibility that interests of some individuals, groups and institutions may still be negatively affected by the activities of the Project.

Typical grievances that are anticipated from the implementation of the Project include:

1. OHS risks
2. Poor labor working condition
3. Disputes over the breach of contract
4. Discrimination, inappropriate and unfair treatment by staff
5. Sexual harassment and sexual exploitation and abuse.
6. Incomplete or no service.
7. Use of personal data without consent.

Below are the procedures to be followed for submitting grievances:

Step 1: Submission of grievances

Step 2: Recording of grievance and providing the initial response

Step 3: Investigating the grievance

Step 4: Communication of the Response

Step 5: Agreement and Implementation of the Response

### **Step 1: Submission of grievances:**

Grievance will be submitted using the following channels

- By completing a written grievance registration form that will be available in the PMU offices and project sites.
- Submitting the complaint electronically via email or electronic grievance form that will be available at the Project's website and Project sign boards.
- Submitting a written complaint in the complaint boxes at the PMU and project sites.
- Telephone and mobile numbers assigned for complaints at the PMU and project sites.

Where possible, it is desirable that complaints be submitted in writing by the complainant. Should the complainant not wish/unable to comply with this request and submit the complaint verbally, then the complainant information and the details of the complaint should be entered in the GM logbook.



### **Communication Channels:**

Individuals and/or groups are free to choose the method that best suits them to file a grievance, they may do so in writing or verbally. The following channels of communication are made available to register a general grievance, including methods for anonymous grievance.

1. Contact the PMU Office (grievance can often be resolved on site, especially if it is related to wrong or incomplete information or a perception by the claimant)
2. Drop a letter in the Grievance letter box that will be located outside of project sites (allows for anonymous grievance)
3. By telephone on the following number Tel: TBC (allows for anonymous grievance)
4. By email via Grievance.
5. Write a letter to the E&S Specialist or Project Coordinator.
6. Express the grievance or issue in any of the stakeholder consultation meetings

### **Step 2: Recording of grievance and providing the initial response:**

Once a grievance is received, the E&S specialist at PMU will fill it in accurately. All complaints received will be filed in a GM logbook. The following information will be registered in the Logbook:

- Complaint Reference Number
  - Date of reception of the complaint
  - Name of the complainant or id for anonymous grievance
  - Confirmation that a complaint is acknowledged
  - Brief description of the Complaint
  - Complaint receipt handed to the complainant
  - Details of internal and external communication
  - Action taken: (Including remedies / determinations / result)
  - Date of finalization of complaint

### **Step 3: Investigating the grievance:**

The E&S specialist at the PMU will investigate the grievance by following the steps below:

- Verify the validity/eligibility of the information and documents enclosed and give the complainant initial confirmation within three (03) days of receipt of the complaint.
- Ask the complainant to provide further information if necessary.
- Refer the complaint to the relevant department.
- The relevant department shall investigate the complaint and prepare recommendation to the PMU of actions to be taken and of any corrective measures to avoid possible reoccurrence.
- The staff shall register the decision and actions taken in the GM logbook.

#### **Step 4: Communication of the Response:**

The E&S specialist at the PMU shall notify the complainant of the decision/resolution/action immediately either in writing, or by calling or sending the complainant a text message. When providing a response to the complainant, the staff must include the following information: A summary of issues raised in the initial complaint; and Reason for the decision.

- For eligible and straightforward grievances, GM staff will provide a response without further investigation within 10 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- For eligible grievances that require further assessment, GM staff will further engage with the complainant via a phone call or a formal meeting to collect further information. Based on this, they will provide, within 14 days from the initial date of receipt of the grievance, actions proposed to resolve the complaint and agreement on the response is sought with the complainant.

- Imminent and serious safety risks reported by the project affected parties will be addressed immediately and will not follow the normal timeline.
- In all the above-mentioned scenarios, the response should include a clear explanation of the proposed response including any alternative options, while clarifying to the extent possible the rights of the complainant, and the choices he has including: 1- to agree to proceed; 2- request for a second round of assessment; 3- to consider any other organizational, judicial, or non-judicial possibilities.
- In case the grievance feedback is satisfactory to the complainant, the response should be implemented and recorded in the grievance logbook with the date of grievance resolution.
- In case the grievance feedback is not satisfactory to the complainant, he/she has the right to appeal within five (05) working days. In such case a second tier should be initiated where the GM staff will attempt to propose alternative options and carry out additional investigation to meet the concerns of the complainant, and other stakeholders. The complainant will be invited to attend an appeal meeting or to discuss the appeal over a pre-scheduled phone call, during the first three days following the appeal. Where needed, a grievance committee might be established representing different sectors as relevant to the complaint. The GM staff should send their response within seven (07) days from the date of the appeal. The second-tier response should also include a clear explanation of the proposed response including all alternative options and the choices the complainant has as described above.

**Step 5: Agreement and Implementation of the Response:**

- If the grievance has been resolved, the GM staff will document the actions taken, time it took to resolve the grievance and satisfactory resolution.

- If the grievance has not been resolved, GM staff should document additional information including actions taken, communication with the complainant, and the final decisions made by the complainant with regards to any other alternatives.
- In general, confidentiality should be maintained in GRM documentation, if the complainant has requested so.
- In all cases, the total number of grievances should be recorded, including time it took to resolve them, as well as the number of unresolved cases.

### **Specific measures for SEA/SH related grievances**

Dedicated grievance measures have been created for Gender-based Violence (“GBV”) and particularly SEA/SH complaints, considering there are risks of stigmatization, rejection and reprisals against survivors. These socio-cultural norms create and reinforce a culture of silence, so survivors may be reticent to approach the Project directly. Some survivors may choose to seek services directly and never report to the GM. To enable survivors of SEAH to safely access the GM, multiple channels through which complaints can be registered in a safe and confidential manner will be enabled. Channels that allow the submission of anonymous grievance include:

- Drop a letter in the Grievance letter box that will be located outside the project sites (allows for anonymous grievance).
- File a grievance by phone on the following number Tel: TBC (allows for anonymous grievance).
- Provide individuals with dedicated contacts from NGOs specialized in SEA/SH e.g. Women Rehabilitation Organization Specific GRM considerations are taken for addressing SEA/SH to maintain confidentiality and safeguard the individual’s identity. Through the grievance process, information remains anonymous and does not require the survivor to record more details than the nature of the complaint, such as background information of the survivor and possible information on whether the survivor was referred to services.

**CHAPTER SEVEN:  
GENDER-BASED  
VIOLENCE ACTION  
PLAN**

This Gender- Based Violence Action Plan (GBVAP) forms the basis for operationalizing the results and recommendations of the gender analysis. It contains specific gender elements to be considered in the Project design and during the implementation of Project measures and activities. Moreover, it helps to monitor implementation of these measures and activities. Hence, the GBVAP ensures an effective gender mainstreaming and integration of a consistent gender-perspective in the Project to maximize development of co-benefits. The aim is to promote opportunities, drivers of change and positive gender dynamics as well as to manage and mitigate potential adverse risks over the duration of the Project. The objective of the GBV Action Plan is to and explore how to strengthen or enhance the procedures to ensure equity and non-discrimination, as well as to prevent gender-based violence during project implementation. The GBVAP is closely aligned to the outputs of the planned activities. It complements the [Environmental and Social Risk and Mitigation Section](#) . The Project will apply the following measures:

1. The project will provide trainings on managing SEA/SH cases to all project workers
2. Project workers will have to sign a code of conduct. Staff in PMU, teachers, trainers and any other type of workers will sign Codes of Conduct.
3. The Project will disseminate information related to SEA/SH to service providers and intended beneficiaries to enhance SEA/SA awareness and prohibit SEA/SH during the provision of health care. The information can be disseminated in different ways, such as public posters, training workshops, and two-way communication between health authorities and communities, as well as development of additional rapid guidance on how to deal with SEA/SH complaints in operations with existing GMs or using hotlines.
4. The communities living in the vicinity of health facilities that will be supported by the project will be made aware of the GM that can be utilized to raise concerns or complaints regarding the conduct of project related workers. Any cases related to SEA/SH will be handed through a separate GM channel.

5. The PMU will ensure prevention and reporting procedures available for SEA and SH as set out in the SEP and implemented.
6. The Projects will document the positive and negative effect that project's activities have on gender relations by setting up an adequate, gender-sensitive results-based monitoring and by collection of sex-disaggregated data.
7. A gender-sensitive language is used in reports, training materials and publications.
8. In the program team(s), competencies on gender will be considered during the hiring process and (further) developed by means of training, where needed.
9. The GBVAP will be executed, where possible, by the different entities involved in the Project management, including all concerned Government line agencies and development partners.

**CHAPTER EIGHT:  
CULTURAL HERITAGE  
MANAGEMENT PLAN**

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## **8.1 Extensive Summary**

This Cultural Heritage Protection Framework (CHMP) is prepared to fulfil the World Bank's requirements for the government on the application of the Environmental and Social Standards (ESS 8) which form part of the World Bank's Environmental and Social Framework. The ESS 8 is triggered for the Youth Inclusion Project as the project will support the youth on vocational trainings will prepare them to entrepreneurship opportunities with a focus on a range of local occupations in the cultural and creative industries sector, ranging from visual arts, crafts and intangible cultural heritage (e.g., handicraft, cobbling, tailoring, jewelry, culinary traditions, management of heritage sites, etc.) to design and creative services such as housing-related industries (e.g., furniture, lighting, or home textile).

This CHMP sets out measures designed to protect cultural heritage throughout the project life cycle. In addition, for the purpose of inclusion no one leave behind, the CHMP will follow the provisions on Stakeholder Engagement Plan (SEP) prepared for the YICCI project follow the requirement as set out in the ESS 10 (Stakeholder Engagement and Information Disclosure).

## **8.2 CHMP aim and objectives**

This Cultural Heritage Management Plan (CHMP) sets out general provisions to protect cultural heritage from the adverse impacts of the YICCI. The CHMP is prepared following the World Bank's Environment and Social Standard (ESS8) on Cultural Heritage.

The ESS8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. It sets out measures designed to protect cultural heritage at all stages of the project life-cycle as part of the environmental and social assessment. The attention to cultural heritage is particularly important to be considered in the design of and during the implementation of the project.

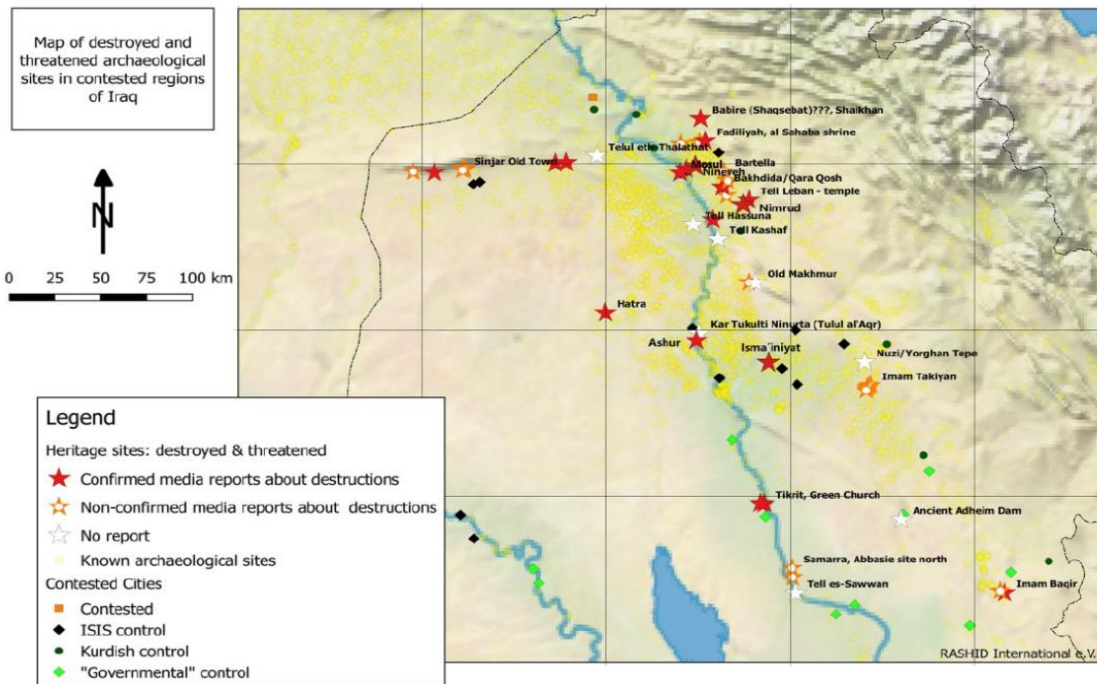
ESS8 is relevant as the activities proposed in the YICCI project could directly or indirectly affect the tangible and intangible cultural heritage and or access to them.

The objectives of the Cultural Heritage Protection plan are to:

- Avoid known cultural heritage sites (including both archaeological sites and tradition sites of communities) where necessary and practicable
- Where avoidance is not possible, manage cultural heritage sites and objects in compliance with the requirements of laws and regulations and in consultation with relevant government officials and local communities and stakeholders
- Provide guidance compliant with the World Bank's ESSs on how cultural heritage findings will be assessed, documented and managed
- Establish Chance Finds Procedure (CFP) to minimize impacts to not yet identified cultural resources that may be discovered during the project cycle
- Enhance relationships with affected communities and eliminate community grievances related to impacts to cultural resources.
- Define the roles and responsibilities for implementing the CHMP and site-specific Plans.

### **8.3 Cultural Heritage in the Project Area**

Ninawa is well-known for its ancient sites and cultural assets, it was home to businesses producing ceramics, paint, leather and wool goods and textiles. Its capital Mosul is known for its cultural diversity, significant heritage resources including its vicinity to World Heritage Sites and the legacy of vibrant cultural and creative industries.



**Figure 4. Map of destroyed and threatened archeological sites in contested regions of Iraq as of June 2016**  
*(Map and legend: RASHID International e.V.)*

The ESS8 requires measures to mitigate the loss or alteration of culturally significant areas, if any. Damage or destruction of newly discovered sites by chance may result from construction related activities in infrastructure and small irrigation system. The ESS8 is triggered as the activities proposed in the YICCI project could directly or indirectly affect the physical and intangible cultural resources of the indigenous communities. Besides, The project might involve very small civil work (cleaning of streets located near cultural heritage sites).

## 8.4 Definition and Implementation of Legal Provisions

The ministry of culture, tourism, and antiquities works with all earnestness and sincerity to protect the pillars of Iraqi culture with its past, present and future, committing to promoting and upgrading it, caring for intellectuals and creators, protecting and preserving folklore, recovering stolen from it, creating a distinctive

cultural climate based on the cultural empowerment of Iraqi society, spreading the culture of national unity, peace and equality, activating international cultural agreements and encouraging Sponsoring cultural projects and developing tourist attractions, archaeological areas and religious centers, as they are one of the tributaries of the national economy.

Nation legislation and the consistency with the World Bank Environmental and Social Framework are illustrated in **CHAPTER THREE**

## **8.5 Measures for CHMP**

### **8.5.1 Approach**

In addition to the requirements of this CHMP and the Bank's ESS8, the existing approach of relevant government agencies, including the provincial culture department in Ninew will be followed in preparing the CHMP.

The following approach for identifying and addressing potential impacts to tangible and intangible cultural heritage will be followed for YICCI. This approach will be reflected in the project's PIM and in the terms of reference of technical assistance:

#### **Cultural heritage in YICCI**

YICCI pays attention to cultural heritage, both tangible (if any) and intangible, in all project communes and ICs. The Government of Iraq, represented by IA (Ministry of Youth and Sport) of the YICCIEA project, will avoid impacts on cultural heritage caused by the project activities (if any). When avoidance of impacts is not possible, the government will identify and implement measures to minimize impacts on cultural heritage, in accordance with the mitigation hierarchy. Where necessary, a Cultural Heritage Management Plan (CHMP) will be developed for participating sites. The CHMP will include an implementation timeline and an estimate of resource needs for each mitigation measure. The CHMP may be developed as a stand-alone plan or as part of other plans developed (e.g., ESMP), depending on the nature and the scale of the risks and impacts of the sub-project.

At any stage of the YICCI project cycle that may have impacts on cultural heritage, IA will: (a) deploy competent professionals to assist in the identification and protection of cultural heritage; and (b) ensure that internationally recognized

practices for field-based study, documentation and protection of cultural heritage are implemented, including by contractors and other third parties. For instance, a chance finds procedure, set out below, for managing chance finds of Archaeological material encountered unexpectedly during project construction or operation which will be included in all contracts relating to construction of the project.

IA will ensure that all relevant stakeholders will be consulted following the requirements of the Bank's ESF, particularly ESS10, to develop and implement appropriate measures to avoid or mitigate impacts on cultural heritage, taking into account the additional requirements set out for specific categories of cultural heritage. Relevant stakeholders will be identified during the environmental and social assessment for specific sites, when identified, for cultural heritage that is known to exist or is likely to be encountered during the life of the project, through the application of ESS10. Stakeholders will include project-affected communities; relevant national or local authorities; and relevant non-governmental organizations and experts, including international cultural heritage organizations.

The specific interpretations of cultural heritage, that may exist in local communities and may differ from national norms or outsider perceptions, will be investigated and taken into consideration. Women and girls have different attachment to spaces and their own cultural heritage than men and boys. The investigation will also take into account the effects of the project into different generations and sub-groups in the communities. Therefore, the process of identification, understanding impacts, the development of appropriate measures for protection of cultural heritage will take these differences into account.

### **8.5.2 Specific Measures**

Specific mitigation measures to avoid or reduce impacts on cultural heritage by project activities include Chance Finds Procedures; measures for strengthening capacity of national and sub-national agencies responsible for managing cultural heritage; establishment of a monitoring system to track the progress and efficacy of these activities; establishment of an implementation schedule and required budget for the identified mitigation measures; and cataloguing of finds.

### Measures for Cultural Heritage in YICCI Project

The provincial YICCI project office maintains a copy of the recently completed national heritage inventory map (available from the Ministry of Culture). The office communicates once a year with the provincial culture department to update this inventory.

Identification of stakeholders and consultation. The importance of cultural and indigenous heritage is explained and consulted during community meetings to identify cultural heritage and to understand if there any concerns about negative impacts the project could have on their cultural heritage.

Tangible and intangible cultural heritage sites are carefully identified prior to detailed survey (land identification). A commune screening note is prepared for each SLC and ICLT site during Year 1. A site-specific CHMP will be developed for the tangible and intangible cultural heritage once the SLC and ICLT sites are identified.

Provisions for specific types of cultural heritages that include archaeological sites and artefacts, historical structures, natural features with cultural significance, and movable cultural heritage.

Local village and indigenous community representatives take part in the actual survey work to show location of any additional sites including tombs and forest or trees of spiritual significance (land identification).

In case SLC sites located in provinces with a rich cultural heritage require an assessment by a qualified expert.

In case of chance finds, the “Chance Finds Procedure” (in Appendix B) will be applied.

Prepare measures for strengthening the capacity of national (EA, IA and relevant ministries) and subnational authorities responsible for managing cultural heritage affected by the project.

**Measure 1** ensures availability of updated inventory data at provincial level.

**Measure 2** aim to mainstream attention to both tangible (if any) and intangible cultural heritage in the YICCI project at district level.

**Measure 3** IA will consult with relevant stakeholders and encourage them to participate in identifying and assigning value to cultural heritage affected/aimed by the project, assessing potential impacts, and exploring avoidance and mitigation options. The IA will ensure the inclusion and cooperation of the various stakeholders through a dialogue with the appropriate authorities, including the relevant national and local authorities to establish effective means for addressing the views and concerns of the stakeholders and involving them in the protection and management of the cultural heritage. Consultations with local project affected/interested communities will ensure that the community's perceptions of cultural heritage, which may differ from national norms or outsider perceptions, are investigated and understood, and that the different perceptions of women and girls, as contrasted with those of men and boys, are taken into consideration.

**Measure 4** set out requirements that IA need to ensure the inclusion and cooperation of the various stakeholders in order to preserve specific types of cultural heritages include archaeological sites and artefacts, historical structures, natural features with cultural significance, and movable cultural heritage, that require additional actions for preservation.

**Measure 5** underlines the importance of participatory mapping in the identification of any sites and objects of cultural significance. When the sites are identified with potential sites and objects of cultural significance, a Cultural Heritage Management Plan for each specific site will be developed, including an implementation timeline and an estimate of resource needs for each mitigation measure. This may be developed as a stand-alone plan or as part of other plans developed (e.g. IPP, ESMP), depending on the nature and the scale of the risks and impacts of the sub-project.

**Measure 7** relates to the potential selection of district with dense cultural heritage, as project province. If such a province is selected, a qualified expert will produce a

detailed assessment of sites and will propose specific reporting and protection measures.

**Measure 8** in case of finds, the “Chance Finds Procedure” will be applied (Appendix B. Cultural Heritage Chance Finds Procedure).

**Measure 9** describes the training and awareness requirements necessary for its effective implementation of the CHMP. IA shall ensure that all YICCI personnel responsible cultural heritage protection are competent and have received the necessary levels of training and awareness raising. The goal of the training is to develop a basic understanding of known sites in the areas of work and explain cultural heritage find identification, stop work, and reporting procedures as per the Chance Finds Procedure. Training will also raise awareness of tangible (if any) and intangible cultural heritage, local customs, and traditional norms, including how to behave within different cultural groups.



**CHAPTER NINE:**  
**LABOUR**  
**MANAGEMENT**  
**PROCEDURES**

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## **9.1 LMP Rationale, Aim, and Objectives**

The Project is being prepared as per the requirements of the ESS2 Labor and Working Conditions of the World Bank's Environment and Social Framework (ESF). The Labor Management Procedures (LMP) identifies the main Labour requirements and risks associated with the project and helps the Recipient to determine the resources necessary to address Labour issues. The LMP will enable different project-related parties, for example, staff of the project implementing unit, contractors and sub-contractors and project workers, to have a clear understanding of what is required on a specific labor issue. The LMP is a living document, which is initiated early in project preparation and is reviewed and updated throughout the development and implementation of the project.

Other objectives of ESS2 include the following:

1. To promote safety and health at work.
2. To promote fair treatment, non-discrimination, and equal opportunity of project workers.
3. To protect project workers, including vulnerable workers such as women, persons with disabilities, migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
4. To prevent the use of all forms of forced labour and child labour.
5. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and
6. To provide project workers with accessible means to raise workplace concerns.

## **9.2 Number and Characteristics of Project Workers**

Based on available information, this section describes the Project workers, their characteristics, the timing of labor requirements, the anticipated or known contracting structure for the project, with numbers and types of suppliers and the

likely number of project workers to be employed or engaged on the Project.

The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP is applicable, as per ESS2 to the Project in the following manner and as per Table 9

**A. Direct Workers.** People employed or engaged directly by MoYS (Implementing Agency (IA) which can be categorized as: (i) Project Management Unit (PMU) on behalf of the IA to work specifically in relation to the Project. The PMU will comprise about seven (7) workers, all local residents; These consultants will be mostly technical staff with skills in administrative, procurement, financial and environmental, and social fields; a(ii) Other Contracted Consultants: specialized consultants about (4) who will be responsible for the day to day operations and the overall oversight of the implementation of all project's activities. Most of the PMU responsibilities will be fulfilled by MoYS staff, while a small group of consultants with experience working in projects funded by donors will be hired, in particular with regards to the operations, procurement and financial management specialists.

**B. Contracted Workers.** People employed or engaged by the Implementing Agency to perform work related to core function. Two NGOs will be employed by the MOYS in accordance with World Bank's procurement guidelines as service provider to conduct activities related to the soft skills and vocational trainings, mainly under component 1, however, the number is not determined yet.

**C. Details of Primary Supply workers under the Suppliers** who will be contracted under the Project are not known at this stage.

**D. No community workers will be engaged under the Project.**

**Table 9. Overview of labor use in the project.**

<b>Workers Type</b>	<b>Number of Workers</b>	<b>Local Residents</b>	<b>Imported/ Foreign Workers</b>
Project Management Unit (PMU)	13	13	0
Consultants	4	4	0
Total Direct Workers	17		
Contracted Workers	Not identified**	Not identified**	Not identified**
Primary Supply Workers	Not identified**	Not identified**	Not identified**
Community workers	Not Applicable	Not Applicable	Not Applicable

<sup>[1]</sup> The numbers depicted in the table were estimated based on approximate estimation. The LMP is a living document whereby the estimations are subject to amendment.

### **9.3 Timing of Labor Requirements**

**Direct Workers:** PMU members are already assigned. During the first phase of the project implementation, consultants will be hired as relevant to each of the project’s components. Eligible beneficiaries' youth and women will also identified during the early stage of the project.

**Contracted workers:** NGO’s will be contracted prior to commencement of activities.

### **9.4 Key Labor Risks**

The key labor risks which may be encountered by the Direct workers during the operation activities are listed below:

- **Unfair and/or unclear contract terms and conditions** including wages,

overtime, compensation, benefits and working hours: In some cases, there might be no contracts issued as many workers will be assigned on a daily compensation basis.

- **Occupational health and safety (OHS) risks:** the nature of the project, coupled with the weak safety culture in the country, might result in health and safety risks. The main causes of OHS risks include but are not limited to the following:
- **COVID-19 infection risks:** During the pandemic of COVID-19, there is a vital risk of getting infected during work, where the workforce is interacting. Particularly interactions in the office environment since it's a closed environment, 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.
- **Risks associated with the lack of workers' awareness:** knowledge on the type and significance of OHS risks involved with their work.
- **Community health and safety issues,** including but not limited to: traffic-related accidents; air pollution and noise impacts; and increased risks of communicable diseases.
- **Irregular payment of salaries:** the significance of this risk can also increase with the lack of an efficient grievance mechanism (GM).
- **Discrimination and non-equal opportunities:** The project involves several types of workers (Direc and contracted). The scale and diverse nature of work increase the probability of occurrence of discrimination and non-equal opportunities risks.

- **GBV/sexual exploitation and abuse (SEA):** The project workers will include both men and women, specially for the Direct workers. . There **is** potential risk of GBV/sexual exploitation and abuse and sexual harassment (SH) and it should be mitigated through the appropriate mitigation measures and introducing Code of Conduct (CoC) in the contract.
- 
- **Risk of labor unresolved complaints:** This risk could be a result of the lack of the absence of a GM, or the presence of inefficient and not properly designed GM
- **Restrictions related to freedom of association and collective bargaining**

## **9.5 Labor Legislation – General**

Iraqi Labour law does not impose an obligation on employers to employ a certain percentage of Iraqi nationals. An exception applies where an investment license is required for a project in which case, according to the Investment Law, at least 50% of the employees in the workforce of the project must be Iraqi nationals. Furthermore, in projects conducted under a foreign investment license, Iraqi nationals must be given priority over foreign workers, unless it can be shown that there are no Iraqi nationals whose skills and qualifications would match the relevant position. Foreign investment law also imposes an obligation on foreign investors to train their Iraqi employees and to enhance their skills.

The Iraqi Labour legislation is consistent with the World bank ESS2 in most key aspects with the exception of few points, namely, requirements for employers to develop internal grievance redress mechanism for workers. For the purposes of this Project the provisions of the World Bank ESS2, stipulated in this Labour Management Procedures document will be followed.

The essential provisions of Iraqi Labour law are embodied in **Law No. 71/1987 and in ICC Articles 900 to 926**. Some amendments were made by CPA Order No. 89.

**Labour Law No. 37 of 2015** aims to regulate the work relationship between the workers and employers and their associations, in order to protect their rights and achieve sustainable development based on social justice and equity, secure decent work for all, without any discrimination for the development of the national economy and the achievement of human rights and fundamental freedoms, regulate the work of foreigners working or wishing to work in Iraq and implement the provisions of Arab and international labour agreements duly ratified.

**The Social Security Law (Law No. 39/1971)** contains further provisions relevant to the employer- employee relationship.

It's worth noting that the Iraqi Labour **Law No. 37 for 2015 article 21** defines the child as anyone younger than 15 years old. However, Iraq is also signatory to the 1989 International Convention on the Rights of the Child, which defines everyone under the age of 18 as a child who must have special protection and care. Considering the type of work in the project, the minimum age for employment will be 18. If a child under the minimum age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child.

### **9.5.1 Wages**

The wages of employees are calculated based on the amount of work performed or the amount of time the employee has put in or on some other criteria. Wages paid shall be no less than the amount specified in employment contracts or standard salaries agreed upon in collective Labour contracts.

In Iraq, the minimum monthly wage for contracted workers is about 330 USD and minimum daily wage is about 14-15 USD per day.

### **9.5.2 Working hours**

- The standard work week is 40 hours (Iraqi law 37 of 2015).

- The maximum working hours are 48 hours per week (Iraqi law 37 of 2015 article 67).
- The minimum rest duration per month is 24 hours.
- If the worker is a contracted worker, he/she will receive full payment by the end of the month despite national holidays (i.e., national holidays will be paid). However, there is no compensation for national holidays with respect to daily wages in both public and private sector.
- Reducing working hours covid-19 pandemic will be subjected to the local authorities.

### **9.5.3 Rest breaks**

The employees must be granted a rest and meal break during the workday. Time and duration are regulated by Iraqi Labour Law (30-60 min) per day.

### **9.5.4 Leaves**

**Ordinary leave:** Employee including PMU and contracted worker will have the right to take a paid leave up to the equivalent of 3 calendar days per month regardless of his/her position (profession), terms of employment or the effective period of their employment contract. The duration may vary depending on the type of workers, causes and reasons.

**Sick leave:** Sick leave duration is (3 to 21 calendar days) It is permissible to grant the employee a full salary for the first leave; half the salary for the second leave; and no salary is given for the third leave for a period that shall not exceed 180 days. In case the employee was not able to resume his/her work after taking the third sick leave, he/she will be released.

**Maternity/Paternity leave:** Female workers will get paid maternity leave. An expectant mother would be entitled to 21 days of maternity leave. Fully paid up to 51 days after submission of the necessary documents. then 12 months with half the



salary) calendar days.

### **9.5.5 Overtime work**

Wages for every hour of **overtime** work shall be paid to employees as follows:

- If wages are based on time worked, the amount paid per hour shall not be less than twice the standard hourly wage.
- If wages are paid based on piecework performed by the employee, extra wages must be paid in an amount not less than the hourly wages of employees with the same pay scale.

### **9.5.6 Labour disputes**

Collective and individual Labour disputes are regulated in accordance with the Iraqi Labour Code. All individual Labour disputes shall be handled by the courts if mutual agreement cannot be reached by parties of contract.

However, in case of collective agreements, a special body may be created within the framework of the union to investigate individual disputes prior to going to court. The creation and functioning of this body may be defined by collective agreements.

### **9.5.7 Discrimination and Non-equal Opportunities**

- The Contractor shall issue and implement internal policies and procedures to assure that no employee or job applicant will be subject to discrimination and/or harassment.
- Practicing code of conduct in which Employees should understand that harassment or violence of any kind is not allowed. The code of conduct should also explain that discrimination is not allowed. This includes discrimination based on any bias, including gender, age, disability, ethnicity, or religion.
- Establishment of mechanisms to ensure non-discrimination of women in

accessing recruitment procedures.

## **9.6 Labor Legislation – Occupational Health & Safety**

### **9.6.1 Public Health Law No. 89 of 1981, Amended by Resolution No.54 of 2001**

In addition to addressing various issues related to the population health, the Law stipulates the provision of the safety of drinking water and drinking water quality standards.

### **9.6.2 Occupational Health and Safety Instructions No. 3/1985 Concerning Occupational Safety**

Provides for the enforcement of occupational safety provisions at places of work.

- Regulates that all workplaces are to appoint a person in charge of occupational safety and an occupational safety committee.
- Provides for the appointment and duties of the person responsible for occupational safety and for the occupational safety committee at each workplace.
- Establishes the functions and duties of employers and employees with regard to occupational safety.

### **9.6.3 Law No. 6 of 1988 Concerning the National Commission for Occupational Hygiene and Safety**

Governs the enforcement of occupational health and safety regulations.

- Provides for inspections of places of employment and inspections reports.
- Establishes the duties and responsibilities of employer's occupational health and safety.

- Establishes the functions of safety commissions at places of work.
- Regulates the responsibilities and duties of workers with respect to occupational health and safety.

## **9.7 Responsible Staff**

The implementing PMU in Baghdad will be directly supervised by the MOF and will report to responsible staff within MOF appointed by the minister. The assigned person will oversee and guide all the workers associated with the project.

The PMU Social and Environmental specialists will be responsible for the following within their responsibility area:

- Implementing the Labor management procedures.
- Monitoring contractors and subcontractors' implementation of Labor management procedures and ensuring that contractors comply with this Labor management procedure.
- Coordinating and leading awareness campaigns and capacity building as needed, monitor, and implement training on LMP and OHS for project workers.
- Ensuring that the grievance redress mechanism for project workers is established and implemented and that workers are informed of its purpose and how to use it;
- Supervising the reception, registration and correct processing of any complaints/grievances received from different stakeholders.
- Responding to the results of internal and external (lenders or regulatory) monitoring visits/ inspection.
- Monitoring implementation of the Worker Code of Conduct.

## **9.8 Policies and Procedures**

The Project's identified risks and impacts will be mitigated with a number of policies and procedures. These will address OHS risks, working conditions and management of worker relationships, non-discrimination and equal opportunities, terms and conditions of employment. The different policies and procedure which the Project will prepare, adopt and implement are listed below.

### **9.8.1 Occupational Health & Safety (OHS)**

To achieve the OHS performance MOF is committed to:

- Provide a clear assignment of OHS responsibilities.
- Comply with legislation which relate to OHS requirements as stipulated in LAW 37 OF 2015, in addition to General World Bank Environmental, Health and Safety Guidelines (EHSGs) and, as appropriate the industry specific EHSGs as well as other Good International Industry Practice (GIIP)
- Prevent OHS risks through promotion of appropriate skills, knowledge, and attitudes toward hazards.
- Contribute to improve OHS management system and performance during project implementation.
- Communicate OHS provisions to all persons, working under control of the PMU with emphasis on individual OHS responsibilities.

To avoid workplace health and safety issues including accidents and injuries, the PMU will:

- Provide and maintain a healthy and safe work environment and safe systems of work.
- Ensure legal labour standards as per Iraqi regulations (child/forced labour, no discrimination, working hours, minimum wages) are met.
- Provide hygienic, adequate facilities for workers, ensuring toilets and changing rooms are separated to male and female employees.

- Be intolerant of and enforce disciplinary measures for illegal activities. To be intolerant of, and enforce disciplinary measures for GBV, inhumane treatment, sexual activity with children, and sexual harassment.
- Incorporate a gender perspective and provide an enabling environment where women and men have equal opportunity to participate in, and benefit from, planning and development.
- Ensure that workers have access to and are aware about the GM.
- Provide an environment that fosters the exchange of information, views, and ideas that are free of any fear of retaliation, and protects whistle-blowers.
- Minimize the risk of pandemic notably COVID-19 transmission and to mitigate the effects of COVID-19 associated with the execution of the Project; and
- Provide appropriate insurance schemes for all the types of workers, covering work related accidents (injuries and fatalities), as well as insurance for third parties, where applicable.

### **COVID-19 Considerations**

The PMU should develop specific procedures or plans so that adequate precautions are in place to prevent or minimize an outbreak of COVID-19, and it is clear what should be done if a worker gets sick. These measures include but are not limited to:

- Assessing the characteristics of the workforce, including those with underlying health issues or who may be otherwise at risk
- Confirming employees are fit for work, to include temperature testing and refusing entry to sick workers
- Considering ways to minimize entry/exit to site or the workplace, and limiting contact between workers and the community/public
- Training workers on hygiene and other preventative measures, and implementing a communication strategy for regular updates on COVID-19

related issues and the status of affected workers

- Treatment of workers who are or should be self-isolating and/or are displaying symptoms
- Assessing risks to continuity of supplies of medicine, water, fuel, food and PPE, taking into account international, national and local supply chains
- Adjustments to work practices, to reduce the number of workers and increase social distancing
- Establishing a procedure to follow if employee becomes sick (following WHO guidelines)
- Implementing a communication strategy with the community, community leaders and local government in relation to COVID-19 issues on the site.

### **9.8.2 Terms and Conditions of employment**

- ***Wages and working hours***

All Direct Workers will be provided with clear and understandable terms and conditions of employment. Monitoring systems will be put in place to ensure that all types of Project workers will be properly paid on a regular basis and compensated for longer working hours. Workers will be presented with details of grievance procedures, including the person to whom grievances should be addressed. Details about the workers' grievance, and mechanisms which will be adopted are described in the following section.

Forced labour, refers to any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. These practices will be prohibited and will not be used in connection with the project. This prohibition covers any kind of involuntary or compulsory labour. If forced labour is discovered in the project's workforce, prompt action will be taken to address the practice that has coerced the worker and not recreate conditions of coercion. Any cases of forced labour discovered in the project's workforce are referred to relevant government authorities and support services, as appropriate, to be addressed in accordance with national law. These may

include bonded labour (work in satisfaction of a debt of an amount that would be difficult or impossible to pay off), excessive limitations on freedom of movement, excessive notice periods, retaining the worker's identity and other government-issued documents, imposition of recruitment or employment fees payable by the worker at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work on a non-voluntary basis.

- ***Freedom of Association and Collective Bargaining***

The rights of workers and the role of unions will be respected and the right to enter free and voluntary collective bargaining arrangements with management is respected.

- ***Equal Opportunity and Non-Discrimination***

As specified in the Labour Code, employment of project workers will be based on the principles of non-discrimination, equal opportunity and fair treatment. There will be no discrimination with respect to any aspects of the employment relationship, including recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment. Where disabled persons are hired (higher probability will be among Direct Workers), accessibility will be ensured in terms of provision of wheelchair ramps or elevators, or alternative formats of communication.

Men and women will be given equal opportunities relating to all recruitment opportunities under the project. This will apply to hiring of all project workers. The workforce grievance mechanism (GM) will be communicated to all workers as detailed in section 10 and will be used for noncompliance monitoring.

- ***Gender Based Violence (GBV)***

The COC commits all persons engaged to acceptable standards of behaviour. The COC must include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The COC should be written in plain Arabic and Kurdish language and signed by each worker to indicate that they have:

- Received a copy of the COC as part of their contract.
- had the COC explained to them as part of the induction process.
- Acknowledged that adherence to this COC is a mandatory condition of employment.
- Understood that violations of the COC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the COC shall be displayed in a location easily accessible to the community and project-affected people. It shall be provided in Arabic and Kurdish.

### **9.8.3 Age of Employment**

Iraqi legislation prohibits anyone under 18 from performing "unhealthy or heavy" labour and there are special requirements for leave, working hours, and other conditions of employment. Workers that will be hired within the project must be above 18. It is expected that workers to be hired within the project will be over 18. Given the nature of work, mostly semi-skilled/unskilled labour is required. No worker will be employed under the age of 18.

Contractors (and consultants) will be required to verify the identity and age of all workers. This will require workers to provide official documentation, which could include a national identification card, passport, or medical or school record. If a child under the minimum age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, considering the best interest of the child.



### **Process of age verification**

To prevent engagement of under-aged labour, all contracts with work contractors shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance, and it will be well communicated to all potential stakeholders including the local community where the unskilled workforce will be sourced. The contractor is required to maintain labour registry of all contracted workers with age information. Verification of the age shall be undertaken prior to the engagement of labor and be documented. Below is indicative age verification means that could be used in the context where official ID system is unavailable:

- Check any additional official documents such as birth certificate, national ID, passport, driving licence or other credible records, where available.
- Obtain written confirmation from the medical practitioner.
- Obtain written and signed declaration from the worker and his/her parents or guardian; or
- Inquire with the local community leader, community action group or with other credible community sources.

## **9.9 Terms and Conditions**

### **9.9.1 Direct workers**

#### **Maximum number of hours that can be worked on the project**

- The standard work week is 40 hours (Iraqi law 37 of 2015).
- The maximum working hours are 48 hours per week (Iraqi law 37 of 2015 article 67).
- The minimum rest duration per month is 24 hours.
- Reducing working hours covid-19 pandemic will be subjected to the local authorities.

#### **Provisions on termination**

Project workers will receive written notice of termination of employment and details of severance payments in a timely manner. All wages that have been earned, social security benefits, pension contributions and any other entitlements will be paid on or before termination of the working relationship, either directly to the project workers or where appropriate, for the benefit of the project workers. Where payments are made for the benefit of project workers, project workers will be provided with evidence of such payments

### **Injuries and death**

It is the contractor's responsibility that all workers, including temporary and daily labourers, shall be appropriately insured against injuries and death

### **9.9.2 Primary Supply Workers**

The requirements under ESS2 for primary suppliers are related to risks of child labor, forced labor and serious safety risks. When sourcing [hard and electronic materials] from primary suppliers, the MoYSR will require such suppliers to identify the risk of child labor/forced labor and serious safety risks. The PMU will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment and any other relevant due diligence (such as the review of license for quarries). Where appropriate, the MoYS will be required to include specific requirements on child labor/forced labor and work safety issues in all purchase orders and contracts with primary suppliers.

If child labor/forced labor and/or serious safety incidents are identified in relation to primary supply workers under the project, the PMU (and supervision consultant) will require the primary supplier to take appropriate steps to remedy them. Such mitigation measures will be monitored periodically to ascertain their effectiveness. Where the mitigation measures are found to be ineffective, the PMU and the engineering and supervision consultant will, within reasonable period, shift the project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements.

## **9.10 Workers Grievance Mechanism**

A well-communicated and easily accessible grievance mechanism will be provided for all Direct and Contracted Project Workers to raise workplace concerns related to recruitment process and/or workplace conditions. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. The E&S specialist at the PMU are responsible for managing workers' grievances.

The workplace grievance mechanism will be designed to be easily understandable, clear, and transparent and to provide timely feedback. The policy of confidentiality and non-retribution will be reinforced, along with ability to raise anonymous grievances.

The mechanism will include multiple communication channels dedicated for workplace complaints only, including but not limited to an email address/website link; phone number; and a physical address for handing the complaints and grievances in person. Workers will have the freedom to pick the one they are comfortable using. The exact design will be finalized and will be disseminated prior to the launch of any contracts signatures and all contractors will be aware that those are systems related to the project that they need to comply to.

The system will be extended to receive and respond to additional calls and to include specific measures for addressing SEA/SH to maintain confidentiality and safeguard the individual's identity. Through the grievance process, information will remain anonymous and will not require the survivor to record more details than nature of the complaint, such as background information of the survivor and information on whether the survivor was referred to services. All staff and operators who will be handling the GM will receive the necessary training for effective handling of complaints including on any potential SEA/SH related complaints.

The workplace grievance mechanism will not impede access to other judicial or

administrative remedies that are available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

## **Procedures**

Employees will be encouraged to discuss their grievances and complaints informally with their direct managers. In cases where the direct manager is related to the subject of the complaint, the employee would most probably choose to directly submit a formal grievance. This can be done by sending an email or using other options as outlined above.

For all cases where the employees decide to submit a formal grievance, the following provides details about the step-by-step procedure they will be applied:

### ***1- Receipt, acknowledgment and registration***

- The Employee will submit the grievance through one of the dedicated channels indicated above.
- The worker will be requested to use to the extent possible a grievance template which will be shared with all workers in hard/soft copies /available to download from the website.
- If the worker wishes to submit the grievance orally via phone or in person, the project staff will lodge the complaint on their behalf, and it will be processed through the same channels.
- Under request of the plaintiff, grievances can be lodged anonymously. This option shall be made clear to the complainant in the Grievance template and/or in cases of oral submissions.
- In case of anonymity opt-out, the worker will provide contact details or any other suitable means for him/her to be updated on the status of their complaints/grievances.
- All received grievances shall be logged into the workplace grievance log.
- In all cases, the staff in charge should provide a timely communication back to

the complainant(s) that their grievance has been received, will be logged and reviewed for eligibility and provide them with the registration number. Clean and announced standards for the time frame of the response should be established, announced and adhered to.

## ***2- Grievance verification and assessment***

- In order to verify the grievance, it should be discussed with the worker, investigated and evidence gathered to the extent possible.
- The GM staff will need to make a decision with regards to the eligibility of the grievance or whether it should be directed to other mechanisms such as the project GRM. The following represents the proposed eligibility criteria:
  - Is the complainant one of the project's workers.
  - Is the complaint related to one of the following OHS and/or worker and labor conditions: 1- OHS; 2- Forced labour; 3- Social insurance; 4- wages and working hours; 5- discrimination and unequal opportunities; 6- Gender Base Violence, SEA/SH 7- Freedom of association and collective bargaining?
  - Is the complaint not related to any of the above categories but still related to labor and working conditions?

## ***3- Response and Feedback***

- **As an initial response**, the complainant will be informed with the eligibility results as well as all the steps being taken to address his concerns. This initial response shall be provided via a formal letter; an email; or a phone call within 3 working days from the date of receipt of the grievance.
- **For eligible and straightforward grievances**, GM staff will provide a response without further investigation within 10 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- **For eligible grievances that require further assessment**, GM staff will further engage with the complainant via a phone call or a formal meeting in order

to collect further information. Based on this, they will provide within 14 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.

- Imminent and serious safety risks reported by the worker will be addressed immediately and will not follow the normal timeline.
- In all the above-mentioned scenarios, the response should include a clear explanation of the proposed response including any alternative options, while clarifying to the extent possible the rights of the complainant, and the choices he has including: 1- to agree to proceed; 2- request for a second round of assessment; 3- to consider any other organizational, judicial or non-judicial possibilities.
- In case the grievance feedback is satisfactory to the complainant, the response should be implemented and recorded in the grievance log with the date of grievance resolution.
- In case the grievance feedback is not satisfactory to the complainant, he/she has the right to appeal within 5 working days. In such case, a second tier should be initiated where the GM staff will attempt to propose alternative options and carry out additional investigation in order to meet the concerns of the complainant, and other stakeholders. The complainant will be invited to attend an appeal meeting or to discuss the appeal over a pre-scheduled phone call, during the first three days following the appeal. It will be preferred that a more senior staff attend/discuss the appeal with the employee. Where needed, a grievance committee might be established representing different sectors as relevant to the complaint, in addition to worker representative(s) (upon the complainant consent) in order to help achieve a transparent process. The GM staff should send their response within 7 days from the date of the appeal. The second-tier response should also include a clear explanation of the proposed response including all alternative options and the choices the complainant has as described above.

#### ***4- Agreement and implementation of the response***

- If the grievance has been resolved, the GM staff will document the actions

taken, time it took to resolve the grievance and satisfactory resolution.

- If the grievance has not been resolved, GM staff should document additional information including actions taken, communication with the complainant, and the final decisions made by the complainant and the organization with regards to any other alternatives.
- In general, confidentiality should be maintained in GM documentation, if the complainant has requested so.
- In all cases, the total number of grievances should be recorded including time it took to resolve them, as well as the number of unresolved cases.

### **9.11 World Bank Grievance Redress System**

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, because of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit:

*<http://www.worldbank.org/en/projectsoperations/products-and-services/grievance-redress-service>*. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## ANNEXES

- Annex 1: Sub-project Environmental & Social Management Plan (ESMP) Checklist**
- Annex 2: Consultation Documentation**
- Annex 3: World Bank Environmental and Social Standards (ESSs)**
- Annex 4: Code of Conduct (CoC)**
- Annex 5: Gap Analysis between Iraqi and WB Requirements**



**Annex 1: Sub-project simplified Environmental & Social Management Plan (ESMP)**

**Simplified ESMP to be used during the implementation and monitoring of the project**

NO.	POTENTIAL IMPACT Category/Aspect	<input type="checkbox"/>	MITIGATION MEASURES	R	MONITORING PARAMETERS	Key Performance Indicators (KPIs) comments or notes
1	Waste Management	<input type="checkbox"/>	Coordinate with the local authorities to identify the location of the final disposal site to be included in the ESMP for these universities / centers.	<input type="checkbox"/>	All mitigation measures have been implemented as described in the mitigation section.	
		<input type="checkbox"/>	Minimize waste generation on-site and develop and adopt a simple waste management plan for specific waste streams as indicated below.			
		<input type="checkbox"/>	Waste collection and disposal/reuse/recycling options and sites will be identified for all major waste types expected such as electronic waste.			
		<input type="checkbox"/>	Design a segregation system based on compatibility of different waste streams and based on the recycling services (if locally available).	<input type="checkbox"/>	Records of type and amount of waste, especially for electronic waste.	
		<input type="checkbox"/>	Food wastes must be collected, and stored in closed waste containers located at each university / center considering health and hygiene issues, and disposed off-site through licensed contractors.			
		<input type="checkbox"/>	Storage, transport and handling of all waste types must be conducted in accordance with all legislative requirements, through licensed contractors and in coordination with the local authority			
		<input type="checkbox"/>	Open burning of waste material is prohibited on site			
		<input type="checkbox"/>	Complete prohibition of solid and liquid waste dumping in any water body	<input type="checkbox"/>	Number of Environmental and OHS incidents related to waste collection and	
		<input type="checkbox"/>	Complete prohibition of solid and liquid waste dumping in any water body			

NO.	POTENTIAL IMPACT Category/Aspect	R	MITIGATION MEASURES
2	Community Health and safety	<input type="checkbox"/>	Implement all the measures related to waste management as indicated in Section 2
		<input type="checkbox"/>	Adopt and implement the Stakeholder Engagment Plan <b>SEP</b> prepared for the project, including clearly communicating the phone number/channels to receive grievances.
		<input type="checkbox"/>	Adopt and implement a health management system for the staff to ensure through medical check-ups, they are fit for work and that they will not introduce disease into local communities. Regular inspection of university / center staff against communicable diseases (COVID-19) and provision of vaccination when needed.
		<input type="checkbox"/>	Carry on an ongoing identification, evaluation and monitoring of potential community health and safety risks

<input type="checkbox"/>	disposal.	
<input type="checkbox"/>	<b>MONITORING PARAMETERS</b>	<b>KPIs, comments or notes</b>
<input type="checkbox"/>	All mitigation measures have been implemented as described in the mitigation section.	
<input type="checkbox"/>	Stakeholder Engagment Plan adopted and implemented	
<input type="checkbox"/>	Number of community health and safety- related complaints received and the time it took	

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	to resolve them	
	Number of unresolved complaints	

NO.	POTENTIAL IMPACT Category/Aspect	R	MITIGATION MEASURES
3	Labour and Working Conditions	<input type="checkbox"/>	Prohibit child labour and forced labour, relating to any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This prohibition covers any kind of involuntary or compulsory labor.
		<input type="checkbox"/>	Adhere to national law and LMP requirements with respect to working hours, rest periods, annual and sick leave, minimum wage, fair and clear contractual terms and conditions.
		<input type="checkbox"/>	Develop, adopt and implement the Worker GRM as detailed in the LMP.

R	MONITORING PARAMETERS	KPIs, comments or notes
<input type="checkbox"/>	All mitigation measures have been implemented (in specific those related to the code of conduct including GBV and other labour influx risks)	
<input type="checkbox"/>	Workers right to work (including contracts, age etc.) and Inclusion of minimum labour standards in all workers contracts	

		<input type="checkbox"/>	<p>Introduction of strict sanctions (e.g., dismissal) for staff/workers involved in any form of abuse, inappropriate behavior or GBV</p>
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<input type="checkbox"/>	Condition of Rest Facilities	
<input type="checkbox"/>	Number of complaints received, number solved and the time it took to solve them.	
<input type="checkbox"/>	Number of unresolved complaints	
<input type="checkbox"/>	% of site employees trained on OHS, code of conduct and emergency procedures and GRM	

NO.	POTENTIAL IMPACT Category/Aspect	R	MITIGATION MEASURES
		<input type="checkbox"/>	Ensure compliance with local and international guidance and codes of practice on Environmental Health and Safety (EHS) management.

R	MONITORING PARAMETERS	KPIs, comments or notes
<input type="checkbox"/>	Reports on any accidents, hazardous events, as well as	

<b>Occupational Health &amp; Safety</b>	<input type="checkbox"/>	For the staff in charge of waste collection (on site) and waste disposal (off-site): Provision of full Personal Protective Equipment (PPE) including suitable footwear to avoid slippage. Workers' PPE will comply with international standards and regulations (always hardhats, as needed masks and safety glasses, harnesses and safety boots). They must also be trained on how to use the PPE. Provision of appropriate training for Workers on health and safety issues will be provided in local language and will consider the local culture and level of knowledge, during an induction session and refresher sessions every year.
	<input type="checkbox"/>	Provision of appropriate and enough first aid equipment, and fire extinguishers in good condition. Firefighting equipment will be placed in prominent positions across the university / center where they are easily accessible. This includes fire extinguishers, a fire blanket as well as a water tank
	<input type="checkbox"/>	Staff must be trained to recognize potential OHS hazards, use of proper work practices and procedures, recognize adverse health effects, understand the physical signs and reactions related to exposures, and are familiar with appropriate emergency evacuation procedures.
	<input type="checkbox"/>	Preparation and adoption of an emergency response plan. Identify and provide contacts of closest authorities and emergency services to contact in case of emergencies

	records and reports on health, safety and welfare of workers/ staff including number of COVID-19 cases	
<input type="checkbox"/>	Condition of fire extinguishing instruments.	
	Availability & usage	

		<b>R</b>	Prohibit smoking on site
		<b>COVID-19 MEASURES</b>	
		<input type="checkbox"/>	Follow latest WHO and national measures on Covid-19 as relevant.
		<input type="checkbox"/>	Provision of medical insurance for staff covering treatment for COVID-19, sick pay for workers who either contract the virus or are required to self-isolate due to close contact with infected workers and payment in the event of death
		<input type="checkbox"/>	Confirming staff are fit for work, to include temperature testing and refusing entry to sick staff
		<input type="checkbox"/>	Training staff on hygiene and other preventative measures, and implementing a communication strategy for regular updates on COVID-19 related issues and the status of affected staff.
		<input type="checkbox"/>	Treatment of staff who are or should be self-isolating and/or are displaying symptoms.
		<input type="checkbox"/>	Adjustments to work practices, to achieve social distancing.

<input type="checkbox"/>	of PPEs.	
<input type="checkbox"/>	Condition of Rest Facilities.	

		<input type="checkbox"/>	Establish a procedure to follow if a staff member becomes sick (following WHO guidelines)
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NO.	POTENTIAL IMPACT Category/Aspect	R	MITIGATION MEASURES
6	<b>Resource Consumption</b>	<input type="checkbox"/>	Conduct awareness sessions in participating university/center on resource efficiency with particular focus on energy and water efficiency.

R	MONITORING PARAMETERS	KPIs, comments or notes
<input type="checkbox"/>	Awareness sessions documentation	

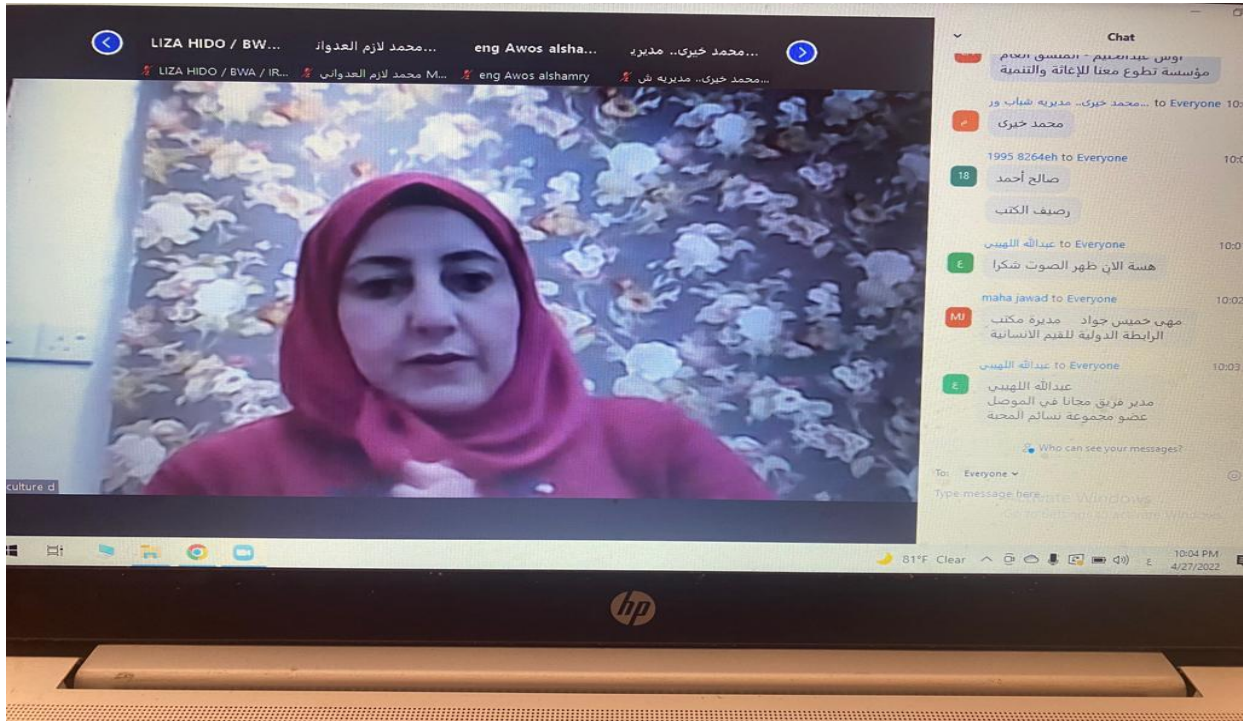
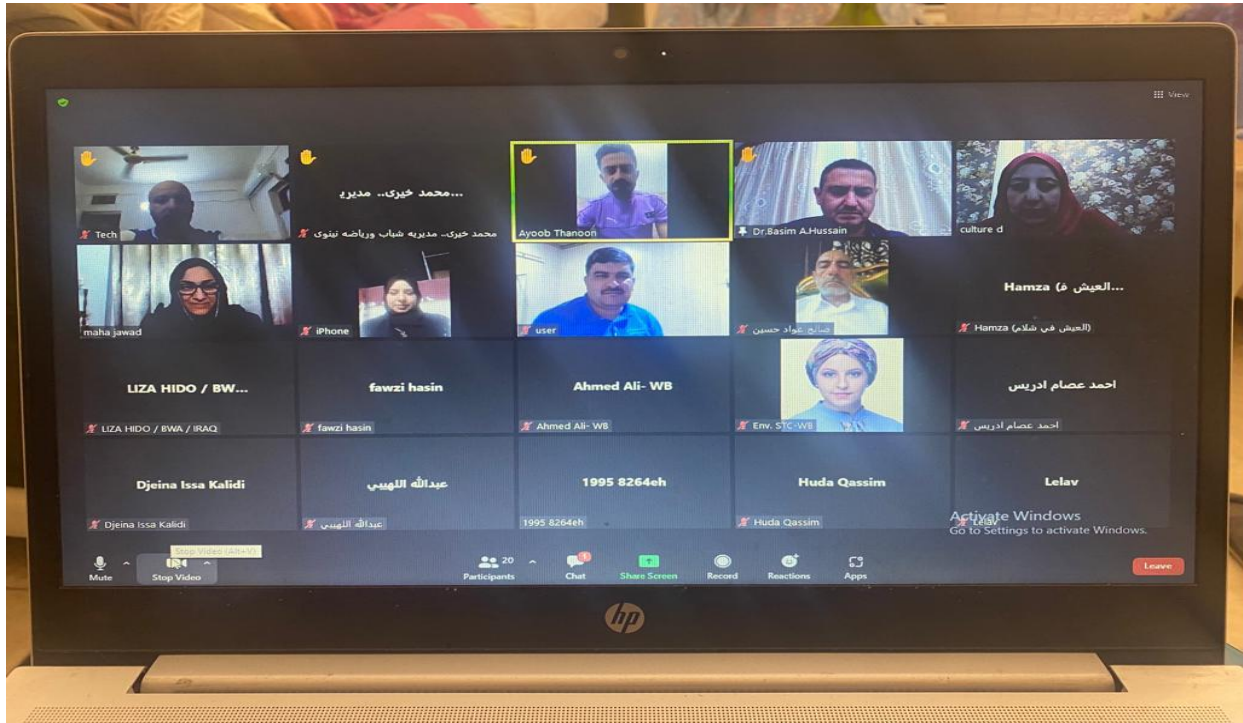
## Annex 2: Consultation Documentation

Actual answers to the questionnaire (strongly agree is indicated by 5, and strongly disagree is indicated by 1)) and the list of participants

Required Response						
		1	2	3	4	5
1	The project will have multiple positive impacts on the local area.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	The project will help providing job opportunities to local communities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	The project will help promoting entrepreneurship and the creation of microenterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	The project will improve students' skills, thus improving the quality of students.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	All members of the local communities will benefit from the project	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	The expected environmental impacts of the project could nevertheless be easily mitigated.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7	The expected occupational health & safety impacts of the project are minimal and could be easily mitigated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	Establishing a GRM for the project is essential for both the community and workers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9	There will not be any damages whether permanent or temporary, which would affect the livelihood of the residents or cause loss of income due to the project activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10	From your understanding of the nature of the work, how far do you agree with that the project will not involve any permanent land acquisition?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11	From your understanding of the nature of the work, how far do you agree with that the project will not involve any physical displacement of residents?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12	The project will not cause any social conflicts or changes in the demographics or social structure in the project area.” How far would you agree?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



## Photo Documentation



	Name of Stakeholder	Gender
<u>1</u>	Dr.Faaz Taha Salim	Male
<u>2</u>	Dr.Moafaq Abdul Wahab	Male
<u>3</u>	Ali Jasim	Male
<u>4</u>	Bushra Abdul Wahab Amin	Female
<u>5</u>	Assel Falih Hasoon	Female
<u>6</u>	Marwa Abdul Ameer	Female
<u>7</u>	Yasamin Mohamed	Female
<u>8</u>	Abdullah Mohamed	Male
<u>9</u>	Rami Raad	Male
<u>10</u>	Ahmed Amari	Male
<u>11</u>	Ahmed Issam	Male
<u>12</u>	Mahir Al Yas	Male
<u>13</u>	Saqar Al Zakariya	Male
<u>14</u>	Liza Tahoo	Female
<u>15</u>	Ahmed Mohamed Najim	Male
<u>16</u>	Ayoob Thanoon	Male
<u>17</u>	Omar Mohamed	Male
<u>18</u>	Salah Al Waraaq	Male
<u>19</u>	Alla Laith Noman	Male
<u>20</u>	Mawahib AL Shibani	Female
<u>21</u>	Salih AL Janabi	Male
<u>22</u>	Ahmed AL Yasiri	Male
<u>23</u>	Hamza Ahmed	Male

### **Annex 3: World Bank Environmental and Social Standards (ESSs)**

The World Bank Environmental and Social Standards (ESSs) are briefly described below:

**Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts**

ESS1 sets out the Borrower's 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 (ESSs)

**Environmental and Social Standard 2: Labor and Working Conditions**

ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can 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.

**Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention**

ESS3 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) threaten 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.

**Environmental and Social Standard 4: Community Health and Safety**

ESS4 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.

**Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

ESS5 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.

**Environmental and Social Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources**

ESS6 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.

**Environmental and Social Standard 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

This ESS applies to a distinct social and cultural group. The terminology used for such groups varies from country to country, and often reflects national considerations. ESS7 uses the term “*Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities*,” recognizing that these groups may be referred to in different countries by different terms. Such terms include “Sub-Saharan African historically underserved traditional local communities,” “indigenous ethnic minorities,” “aboriginals,” “hill tribes,” “vulnerable and marginalized groups,” “minority nationalities,” “scheduled tribes,” “first nations” or “tribal groups.” ESS7 applies to all such groups, providing they meet the criteria set out in the ESS paragraphs 8 and 9.

**Environmental and Social Standard 8: Cultural Heritage**

ESS8 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.

**Environmental and Social Standard 9: Financial Intermediaries**

ESS9 recognizes that strong domestic capital and financial markets and access to finance are important for economic development, growth and poverty reduction. The Bank is committed to supporting sustainable financial sector development and enhancing the role of domestic capital and financial markets.

**Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure**

This ESS recognizes the importance of open and transparent engagement between the Borrower and 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.

## **Annex 4: Code of Conduct (CoC)**

**\*This template must be adapted to the project**

### **1. Introduction**

The Universities and centers are committed to ensuring a work environment which minimizes any negative impacts on the local environment, communities, and its workers. The company also strongly commits to creating and maintaining an environment in which Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) have no place, and where they will not be tolerated by any employee, sub-contractor, supplier, associate, or representative of the company. The purpose of this Code of Conduct is to:

1. Create a common understanding of what constitutes Sexual Exploitation and Abuse, and Sexual Harassment
2. Create a shared commitment to standard behaviors and guidelines for company employees to prevent, report, and respond to SEA and SH, and
3. Create understanding that breach of this code of conduct will result in disciplinary action.

### **2. Definitions**

- **Sexual Exploitation and Abuse (SEA)**<sup>1</sup> : Is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another<sup>4</sup>
- **Sexual Abuse**: “The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”
- **Sexual Harassment**<sup>5</sup> : Unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature.
- **Sexual Harassment versus SEA**<sup>6</sup> : SEA occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff of an organization

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<sup>4</sup> In the context of World Bank Financed operations exploitation occurs when access to or benefit from a World Bank Financed good or service is used to extract sexual gain.

<sup>5</sup> Inter-Agency Standing Committee Protection against Sexual Exploitation and Abuse (PSEA): Inter-agency cooperation in community-based complaint mechanism. Global standard Operating Procedures. May 2016

<sup>6</sup> Ibid

or company and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff trainings can include specific instruction on the procedures to report each.

- **Consent**: is the choice behind a person's voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent.

**Under this Code of Conduct<sup>7</sup> consent cannot be given by anyone under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.**

There is no consent when agreement is obtained through:

- the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation
- the use of a threat to withhold a benefit to which the person is already entitled, or
- a promise is made to the person to provide a benefit.

**While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention of Sexual Exploitation and Abuse (SEA) and sexual harassment which constitute a misconduct, is ground for termination or other consequences related to employment and employment status:**

1. **Examples of sexual exploitation and abuse** include, but are not limited to:
  - A project worker tells women in the community that he can get them jobs related to the work site (cooking and cleaning) in exchange for sex.
  - A worker that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.

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<sup>7</sup> In accordance with the United Nations Convention on the Rights of the Child.

- A project worker gets drunk after being paid and rapes a local woman.
- A project worker denies passage of a woman through the site that he is working on unless she performs a sexual favor.
- A manager tells a woman applying for a job that he will only hire her if she has sex with him.

**2. Examples of sexual harassment in a work context** include, but are not limited to:

- Male staff comment on female staffs' appearances (both positive and negative) and sexual desirability.
- When a female staff member complains about comments male staff are making about her appearance, they say she is "asking for it" because of how she dresses.
- A male manager touches a female staff members' buttocks when he passes her at work.
- A male staff member tells a female staff member he will get her a raise if she sends him naked photographs of herself.



**Annex 5 Gap Analysis between Iraqi and WB Requirements.**

Relevance	National Law/Regulation/Policy No./Title	WB Requirements	Identified Gap
<p><b>General Environmental Legislation</b></p>	<p><b>Law No. 37 of 2008 - The Ministry of Environment</b></p> <p>This Law was legislated to define the institutional arrangements of the Ministry of Environment. It outlines policies, and roles and responsibilities towards protecting the environment.</p>	<p><b>Environmental, Health and Safety (EHS) Guidelines</b></p>	<p>No Gaps Identified</p>
	<p><b>Law No. 27 of 2009 Protection and Improvement of the Environment (<a href="#">Link</a>)</b></p> <p>The law aims at protecting and improving the environment through mitigation of existing damages or damages that are likely to be caused. The Law necessitates the provision of the Environmental Impact Assessment (Article 18) for any new developmental sub-project in the country. The Law addresses the issues of regulation of air pollution and noise reduction, discharge of wastewater effluents, protection of soils, biodiversity conservation, management of hazardous waste, etc. Moreover, the law specifies the punitive measures for violation of the specified regulations</p>		
<p><b>Noise control</b></p>	<p><b>Law No. 41 of 2015 - Noise Protection and Control (<a href="#">Link</a>)</b></p>	<p><b>Environmental, Health and Safety (EHS) Guidelines</b></p>	<p>The Iraqi Legislation does not cover Vibration exposure</p>

	<p>This Law identifies maximum permissible noise limits during day and nighttime for industrial, commercial and industrial zones as follows:</p> <table border="0"> <thead> <tr> <th><b>Receptor</b></th> <th><b>Daytime</b></th> <th><b>Nighttime</b></th> </tr> </thead> <tbody> <tr> <td></td> <td><b>7:00 – 22:00</b></td> <td><b>22:00-7:00</b></td> </tr> <tr> <td>Residential; 55</td> <td></td> <td>45</td> </tr> <tr> <td>Institutional; 55</td> <td></td> <td>45</td> </tr> <tr> <td>Educational</td> <td></td> <td></td> </tr> <tr> <td>Industrial; 70</td> <td></td> <td>65</td> </tr> <tr> <td>Commercial 70</td> <td></td> <td>70</td> </tr> </tbody> </table>	<b>Receptor</b>	<b>Daytime</b>	<b>Nighttime</b>		<b>7:00 – 22:00</b>	<b>22:00-7:00</b>	Residential; 55		45	Institutional; 55		45	Educational			Industrial; 70		65	Commercial 70		70	<p>The EHS guidelines provide instructions on preventive and control measures for noise pollution, especially for industrial activities. It requires that noise impacts “should not exceed levels below or result in maximum increase of in background levels of 3 dBA at the nearest receptor”.</p> <p>One Hour LAeq (dBA)</p> <table border="0"> <thead> <tr> <th><b>Receptor</b></th> <th><b>Daytime</b></th> <th><b>Nighttime</b></th> </tr> </thead> <tbody> <tr> <td></td> <td><b>7:00 – 22:00</b></td> <td><b>22:00-7:00</b></td> </tr> <tr> <td>Residential;</td> <td></td> <td></td> </tr> <tr> <td>Institutional; 55</td> <td></td> <td>45</td> </tr> <tr> <td>Educational</td> <td></td> <td></td> </tr> <tr> <td>Industrial;</td> <td></td> <td></td> </tr> <tr> <td>Commercial 70</td> <td></td> <td>70</td> </tr> </tbody> </table> <p>The EHS guidelines refer to the importance of ensuring vibration exposure is within permissible limits, and that exposure should be checked on a daily basis.</p>	<b>Receptor</b>	<b>Daytime</b>	<b>Nighttime</b>		<b>7:00 – 22:00</b>	<b>22:00-7:00</b>	Residential;			Institutional; 55		45	Educational			Industrial;			Commercial 70		70	<p>limits. Therefore, ESS1 is applicable.</p>
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<p><b>Ambient Air Quality</b></p>	<p><b>Regulation No. 4 of 2012 - Ambient Air Quality</b></p> <p>This regulation aims to protect ambient air quality and to control sources of pollution. The regulation necessitates that source emitting air pollutants abide by national limits and use monitoring</p>	<p><b>EHS Guidelines</b></p> <p>The EHS guidelines follow the WHO standards for the concentration of different air pollutants.</p>	<p>In some cases, the WHO standards match with the Iraqi laws and in others, the WHO standards are more stringent. This is the case for:</p>																																										

	<p>equipment to ensure compliance with standards. It also prohibits the burning of all types of wastes indoors or in open air, next to a residential region or near water bodies.</p> <p>Ambient Air Quality Guidelines</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Concentration</th> <th>Average Time</th> </tr> </thead> <tbody> <tr> <td>CO</td> <td>10 ppm</td> <td>8 hours</td> </tr> <tr> <td>CO</td> <td>35 ppm</td> <td>1 hour</td> </tr> <tr> <td>SO<sub>2</sub></td> <td>0.1 ppm</td> <td>1 hour</td> </tr> <tr> <td>SO<sub>2</sub></td> <td>0.04 ppm</td> <td>24 hours</td> </tr> <tr> <td>SO<sub>2</sub></td> <td>0.018 ppm</td> <td>1 year</td> </tr> <tr> <td>NO<sub>2</sub></td> <td>0.05 ppm</td> <td>24 hours</td> </tr> <tr> <td>NO<sub>2</sub></td> <td>0.05 ppm</td> <td>1 year</td> </tr> <tr> <td>Ozone (O<sub>3</sub>)</td> <td>0.06 ppm</td> <td>1 hour</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>150 µg/m<sup>3</sup></td> <td>24 hours</td> </tr> <tr> <td>PM<sub>2.5</sub></td> <td>65 µg/m<sup>3</sup></td> <td>24 hours</td> </tr> <tr> <td>PM<sub>2.5</sub></td> <td>15 µg/m<sup>3</sup></td> <td>1 year</td> </tr> <tr> <td>TSP</td> <td>350 µg/m<sup>3</sup></td> <td>24 hours</td> </tr> <tr> <td>TSP</td> <td>150 µg/m<sup>3</sup></td> <td>1 year</td> </tr> </tbody> </table>	Pollutant	Concentration	Average Time	CO	10 ppm	8 hours	CO	35 ppm	1 hour	SO <sub>2</sub>	0.1 ppm	1 hour	SO <sub>2</sub>	0.04 ppm	24 hours	SO <sub>2</sub>	0.018 ppm	1 year	NO <sub>2</sub>	0.05 ppm	24 hours	NO <sub>2</sub>	0.05 ppm	1 year	Ozone (O <sub>3</sub> )	0.06 ppm	1 hour	PM <sub>10</sub>	150 µg/m <sup>3</sup>	24 hours	PM <sub>2.5</sub>	65 µg/m <sup>3</sup>	24 hours	PM <sub>2.5</sub>	15 µg/m <sup>3</sup>	1 year	TSP	350 µg/m <sup>3</sup>	24 hours	TSP	150 µg/m <sup>3</sup>	1 year		<p>(Differences with Iraqi Laws vs WHO standards)</p> <p>Ambient Air Quality Guidelines)</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Concentration</th> </tr> </thead> <tbody> <tr> <td>CO</td> <td>N/A</td> </tr> <tr> <td>CO</td> <td>N/A</td> </tr> <tr> <td>SO<sub>2</sub></td> <td>500 µg/m<sup>3</sup></td> </tr> <tr> <td>SO<sub>2</sub></td> <td>20 µg/m<sup>3</sup></td> </tr> <tr> <td>SO<sub>2</sub></td> <td>N/A</td> </tr> <tr> <td>NO<sub>2</sub></td> <td>20 µg/m<sup>3</sup></td> </tr> <tr> <td>NO<sub>2</sub></td> <td>40 µg/m<sup>3</sup></td> </tr> <tr> <td>Ozone (O<sub>3</sub>)</td> <td>100 µg/m<sup>3</sup></td> </tr> <tr> <td>PM<sub>10</sub></td> <td>50 µg/m<sup>3</sup></td> </tr> <tr> <td>PM<sub>2.5</sub></td> <td>50 µg/m<sup>3</sup></td> </tr> <tr> <td>PM<sub>2.5</sub></td> <td>15 µg/m<sup>3</sup></td> </tr> <tr> <td>TSP</td> <td>N/A</td> </tr> </tbody> </table>	Pollutant	Concentration	CO	N/A	CO	N/A	SO <sub>2</sub>	500 µg/m <sup>3</sup>	SO <sub>2</sub>	20 µg/m <sup>3</sup>	SO <sub>2</sub>	N/A	NO <sub>2</sub>	20 µg/m <sup>3</sup>	NO <sub>2</sub>	40 µg/m <sup>3</sup>	Ozone (O <sub>3</sub> )	100 µg/m <sup>3</sup>	PM <sub>10</sub>	50 µg/m <sup>3</sup>	PM <sub>2.5</sub>	50 µg/m <sup>3</sup>	PM <sub>2.5</sub>	15 µg/m <sup>3</sup>	TSP	N/A
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<b>Water Resources Legislation</b>	<p><b>Law No. 50 of 2008 - Ministry of Water Resources</b></p> <p>The Law provisions for establishing the Ministry of Water Resources and creating the legal and technical framework for institutionalization of water resources management in the country.</p>	<p><b>EHS Guidelines</b></p> <p>The EHS guidelines indicate what each sub-project or facility must be aware of the surrounding water resources and the potential wastewater that would be generated. It encourages efficient water usage to reduce the discharge of potential wastewater. It includes the indicators for the wastewater discharge pre- and post-treatment. It includes the guidelines for discharging into surface water and into sanitary sewer systems. The guidelines provide for the protection of water systems and water resources. This is covered from different aspects including protection of drinking water sources of the nearby community, and protection of water resources and systems from sub-project activities.</p>	No Gaps Identified
	<p><b>Law No. 2 of 2001 - Water Systems Protection</b></p> <p>Chapter 4 provides instructions on disposal or recycling of wastewater. It also prohibits the discharge of effluent into public water, unless it meets the criteria and specifications set out by the Environment Protection and Improvement Directorate (EPID). EPID is also allowed to issue environmental restrictions pertaining to the quality of public water as well as the quality of water discharged into public water, sewage systems, or rainwater.</p> <p><b>Act No. 25 of 1967 - Regulation for the Protection of Rivers</b></p> <p>The Act No. 25 of 1967 regulates wastewater discharges and provides physical, biological, and chemical guidelines for water quality. Also, the regulation sets forth provisions for</p>		While Iraq water resource legislation provide sufficient guidance regarding water resource protection, but it lacks sufficient information regarding wastewater management and discharge. Therefore, ESS3 is applicable

	protection of public water bodies from pollution.		
<b>Waste Management Regulation</b>	<p><b>Instructions No. 2 of 2014 - Environmental Protection from Municipal Waste (<a href="#">Link</a>)</b></p> <p>The instruction No. 2 of 2014 aims at protecting the urban environment with a proper management of wastes, such as solid materials, recyclable and non-recyclable derived from domestic, commercial and professional activities, from the cleaning of streets, gardens, farms and public places, and construction waste.</p> <p><b>Directive No. 67 of 1986 - Regulation of Debris Collection Areas</b></p> <p>The older Directive No. 67 of 1986 shall be done in areas with stable geology and avoid damaging the groundwater/water resources and sensitive ecosystems.</p>	<p><b>EHS Guidelines 1.6 on Waste Management</b></p> <p>EHS Guidelines 1.6 define how to differentiate between hazardous and non-hazardous waste, establishing waste management priorities, how to avoid or minimize waste generation, and recover and reuse waste and finally dispose of waste.</p>	<p>The WBG EHS guidelines section 1.6 are much more articulate and define what qualifies as solid waste and promotes the usage of the waste management hierarchy to minimize or avoid waste generation. The Guidelines specify the basics of waste management planning, waste prevention, recycling/reuse and final disposal. It also clearly highlights the need for safe disposal of hazardous waste. The guidelines cover the appropriate methods for waste containment and storage, and safe transportation of solid waste. Therefore, ESS3 is applicable.</p>

<b>Health and Safety Regulation</b>	<b>Law No. 6 of 1988 - Enforcement of OHS Regulations</b>  Law No. 6 of 1998 provides for inspections of places of employment and inspection reports. It establishes duties and responsibilities of employers regarding OHS.	<b>Environmental, Health and Safety (EHS) Guidelines</b>  The WBG EHS guidelines section 2.0 covers in specific details the different aspects of OHS including safety of design, different types of hazards and how to deal with each, the usage of PPE and method of monitoring.	Since the WBG EHS guidelines section 2.0 are much more detailed and inclusive when compared to the Instructions No. 12 of 2016. Therefore, ESS4 is applicable.
	<b>Instructions No. 12 of 2016 - OHS (Link)</b>  Instructions No. 12 supplement the law by providing procedures to be adopted such as the need to train workers on PPE, and the need to establish health and safety committees for monitoring.		
	<b>Law No.89 of 1981 amended by Decree No. 54 of 2001 - Public Health</b>  Chapter One governs general objectives and administrative organs. Establishes the powers and duties of the Ministry Council and the Governorate Health Council. Chapter Two governs preventative medicine. Part One governs primary health care. This concerns maternity, childhood, and family health care, school health care, protection of vision and hearing, dental prevention, nutrition, health education, mental health, and public health Laboratories. Part Two provides for health inspections. Part Three governs the control of communicable diseases. Part Four provides for the conveyance of corpses and	<b>The WBG EHS guidelines section 3.0</b> covers how the sub-project affects its surrounding area and the different environmental and social aspects that must be considered to mitigate any impacts on the surrounding community. This includes protecting water resources, ensuring the sub-project has sound fire management and an emergency response plan, appropriate design for the infrastructure, traffic safety and the provision of a traffic management plan for any sub-project or construction site, disease prevention methods and management of hazardous material. Sub-projects must abide by the EHS guidelines for the protection of the nearby community	No Gaps Identified

	<p>death burials. Part Five provides for the safety of drinking water. Part Six governs the breeding of animals. Chapter Three regulates curative health centers. Regulates public and private health institutions. Chapter Four makes administrative and penal provisions. Chapter Five makes concluding provisions.</p>		
<b>Labour Law</b>	<p><b>Labour Law: No 37 of year 2015</b></p> <p>the law defines the basic principles of recruitment, placement and industrial, the <b>age of start working</b> is 15 years, training, foreign workers employment, individual employment contract, wages, working hours, leave, protection of the female workers and minors (vulnerable groups), protection of workers in quarries, mines and minerals extraction, occupational safety and health and labour inspection, disciplinary measures, collective agreements and bargaining, individual or collective labour disputes, labour jurisdiction, and general and final provisions</p>	<p>With regards to employment relations and working conditions, the WB developed two regulations and standards:</p> <p><b>1. Environmental and Social Standard 2 related to Labor and working Conditions that covers the items below<sup>8</sup>:</b></p> <ul style="list-style-type: none"> <li>● Working Conditions and Management of Worker Relationships</li> <li>● Terms and Conditions of Employment</li> <li>● Nondiscrimination and Equal Opportunity</li> <li>● Workers' Organizations</li> <li>● Protecting the Work Force</li> <li>● Child Labor and Minimum Age</li> <li>● Forced Labor</li> <li>● Grievance Mechanism</li> </ul>	<ul style="list-style-type: none"> <li>● The law does not stipulate the Grievance procedures</li> <li>● The major issue is that the employment age starts from 15 years. Therefore, ESS2 is applicable</li> </ul>

<sup>8</sup> <https://documents1.worldbank.org/curated/en/149761530216793411/ESF-Guidance-Note-2-Labor-and-Working-Conditions-English.pdf>

		<ul style="list-style-type: none"> <li>● Occupational Health and Safety (OHS)</li> <li>● Contracted Workers</li> <li>● Community Workers</li> <li>● Primary Supply Workers</li> </ul> <p><b>2. Managing the Risks of Adverse Impacts on Communities from Temporary Sub-project Induced Labor Influx that discusses the aspects below:</b></p> <ul style="list-style-type: none"> <li>● Child labor and school dropout. Increased opportunities for the host community to sell goods and services to the incoming workers can lead to child labor to produce and deliver these goods and services, which in turn can lead to enhanced school dropout.</li> <li>● Construction camp requirement aspects and on-site facilities</li> <li>● Preparing the ESMF/ESMP, ESIA (if required), Labor Influx Management Plan and/or Workers' Camp Management <u>Plan</u>, commensurate with the</li> </ul>	
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		risks of the sub-project, including consultations with local communities and other relevant stakeholders. Depending on the significance of the labor influx, the management plans could form part of the ESMP, or be standalone.	
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