

West Bank and Gaza Emergency Social Protection and Jobs COVID-19 Response Project Second Additional Financing (P181573)

Additional Financing Appraisal Environmental and Social Review Summary

Appraisal Stage

(AF ESRS Appraisal Stage)

Date Prepared/Updated: 11/19/2023 | Report No: ESRSAFA647



I. BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)		
West Bank and Gaza	MIDDLE EAST AND NORTH AFRICA				
Project ID	Project Name				
P181573	West Bank And Gaza Emergency Social Protection And Jobs Covid-19 Response Project Second Additional Financing				
Parent Project ID (if any)	Parent Project Name				
P174078	West Bank Emergency Social Protection COVID-19 Response Project				
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date		
Social Protection & Jobs	Investment Project Financing	11/15/2023	12/6/2023		
Estimated Decision Review Date	Total Project Cost				
11/14/2023	0				

Proposed Development Objective

To provide cash and/or in-kind emergency support and short-term employment opportunities to vulnerable populations in West Bank and Gaza affected by emergency shocks including COVID-19 and in case of an eligible crisis or emergency, respond to it promptly and effectively.

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

Yes

C. Summary Description of Proposed Project Activities

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



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D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings

The Additional Financing II (AFII) to the parent project is a scale-up and restructuring of the parent project. AFII will be implemented across the Gaza Strip. The project will provide in-kind (food)/cash support to address the grave humanitarian crisis and needs as a result of the War in Gaza. Briefly, the Gaza Strip, has been subjected to relentless bombardment by Israeli forces for over 5weeks. This has led to massive and widespread destruction of necessary infrastructure and a breakdown of basic services. According to recent reports, almost 11000 people have been killed, majority women and children. About 1.5 million people in Gaza have been internally displaced and 45% of Gaza's housing units are reportedly destroyed or damaged. The humanitarian needs in Gaza are extremely high: the UN estimates that US\$303.8 million is required for the food security of 2.34 million Gazans between October and December 2023 alone.

Project activities of relevance to aspects of the Bank's Environmental and Social Framework (ESF) includes provision of in-kind (food) and cash support (Component 1). At this stage, the specific locations where support will be provided have not been identified and this will be determined once there is further information about the facilities/World Food Program (WFP) contracted shops that remain undamaged and able to provide support. The support will be provided under the cash transfer component of the parent project. Finally, the AFII activities will be included under the cash transfer component.

WFP which will be contracted by the MoF to deliver the in-kind and/or cash support to the affected population in Gaza Strip amid different environmental conditions through its identified distribution points in the Gaza Strip.

The E&S documents for the parent and the AFI project will be adopted for the AF II as required, and clear E&S clauses will be included in the POM and the Standard Agreement between the MoF and the WFP.

D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts

MoF is currently implementing the World Bank-funded West Bank Emergency Social Protection Covid-19 Response Project (P174078), the parent project, and its first Additional Financing (AFI). MoF will also implement the current project - Additional Financing II (AFII). For the Parent Project, the Project Coordination Unit (PCU) at the MoF is coordinating project implementation with the technical implementing entities - Ministry of Social Development (MoSD), Ministry of Labor (MoL) and the Palestinian Fund for Employment and Social Protection (PFESP).

The PCU at MoF has developed adequate and dedicated capacity for Environmental and Social (E&S) risk management. An Environmental and Social Officer (ESO) and Health and Safety Specialist (HSS) were engaged in December 2020 and continue to support the PCU for E&S planning, preparation, implementation, and monitoring. The PCU will maintain the ESO during Project implementation. According to the ISR of May 2023, the quality of the E&S progress report submitted by the PCU has improved and provides all necessary details. The overall E&S progress of the project is assessed as satisfactory.



WFP, which will be contracted by the MoF to deliver the support under AFII, is the primary UN agency responsible for delivering emergency social protection interventions. As a United Nations agency, the WFP has integrated safeguards in its work at the policy, project management and operational levels. However, the contract between the MoF and the WFP will be implemented under the World Bank's ESF and the project E&S risks and impacts will be assessed accordingly. Furthermore, WFP also has experience of Bank project's in the Middle East and North Africa (MENA) region including recently an operation in Lebanon.

The WFP has Environmental Health and Safety (EHS) and social protection specialists who provide support at the regional level. In addition, for AFII, WFP will assign an Environmental and Social Specialist (ESS) based in Jerusalem, and will assign and deploy the ESS in Gaza (once the situation on the ground allows) to ensure implementation and monitoring of E&S requirements in accordance with the project's Environmental and Social Commitment Plan (ESCP).

MoF will be responsible for the Project's E&S compliance and the Bank's in-country E&S team will provide capacity building for the implementing agency (IA) project E&S personnel to further strengthen ESF implementation. In addition, the Bank's team is also envisaging providing Environmental and Social Hands-on Expanded Implementation Support (HEIS) and the scope of this support will be defined in discussion with the Government.

Finally, for the parent project/AFI there is an Environmental and Social Management Framework (ESMF) including Community Health and Safety Management Measures (CHSMM); Labor Management Procedures (LMP); and a Stakeholder Engagement Plan (SEP). The ESMF, (including CHSMM), and LMP will be updated and used for AFII, while a SEP has also been prepared for the project. Finally, an Environmental and Social Commitment Plan (ESCP) has been prepared for AFII and will be implemented. The ESCP will include commitments between the Bank, MoF and WFP for project implementation in accordance with the ESF.

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

A. Environmental and Social Risk Classification (ESRC)

A.1 Environmental Risk Rating

The Project AFII aims to provide cash transfers and/or in-kind emergency support under component 1 to respond to the urgent need for social assistance due to the ongoing humanitarian crisis in Gaza Strip. The project will utilize the WFP's extensive network of shops for the delivery of social assistance. The project will neither support the procurement of any equipment nor rehabilitation or construction activities or civil works, therefore, the interventions under this project will not result in any negative environmental impacts. Low risks identified with mitigation attention will be considered related to community health and safety in relevance to traffic and road safety, food safety and risk of communal diseases is addressed under ESS4, and waste management guidelines is addressed under ESS3.

A.2 Social Risk Rating

AFII will have positive impacts as it will help address serious humanitarian needs in Gaza. However, certain risks have been identified that will need to be mitigated during implementation and these include: (i) inequitable access to

Substantial

Low

Public Disclosure

Substantial



project benefits – while social exclusion is not anticipated as a significant issue currently when the entire population of Gaza is vulnerable and struggling for basic necessities including food, once the war ends inequitable access of comparatively marginalized groups (e.g. women-headed households and widows, persons with disabilities, the elderly, children without parents, the poor etc.) to project benefits (in-kind support) is anticipated as a risk due to poor targeting, 'elite capture' and lack of proper information dissemination and disclosure and stakeholder engagement (see ESS1); (ii) community health and safety risks due to potential exposure of members of household, particularly the more vulnerable such as the elderly, persons with disabilities, youth, children, to accidents/incidents or violence due to poor crowd management at in-kind/cash support distribution points/WFP shops, and potential risks of sexual exploitation and abuse, sexual harassment and/or gender-based violence (SEA/SH/GBV) for women (especially women heads of households, women with disabilities) and girls (see ESS4); and (iii) risks related to labor and working conditions and SEA/SH/GBV for direct and contracted workers (e.g. at WFP distribution points/shops, workers of NGOs contracted by WFP) (see ESS2). Social risks will be addressed and mitigated both through the project design (particularly the risks of exclusion and elite capture) and measures included in the project's E&S instruments (e.g. updated ESMF including CHSMM, updated LMP and SEP).

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

B.1 Relevance of Environmental and Social Standards

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Relevant

The Project's overall environmental and social risk is assessed as substantial. The environmental risks are considered low, where the interventions supported under the AF II will provide in-kind and cash support to poor and vulnerable households affected by the ongoing humanitarian crisis in Gaza. The project will neither procure equipment, nor support rehabilitation or construction activities or civil works, and therefore, will not result in any negative environmental risks or impacts. As there are no activities with a physical footprint identified, nor are there activities that could lead to specific actions that could have associated environmental impacts. However, management of waste, road and traffic safety, and food safety associated with the distribution of food is addressed under the relevant standards.

Social risks of exclusion and elite capture are going to be addressed through project design measures that will be finalized by implementation. WFP will carry out social assessments or reviews consistent with ESF requirements during implementation. These assessments or reviews will be undertaken if and as required, and when the security situation on the ground allows. Proportionate mitigation measures identified in the social assessments or reviews will be included (as relevant) in the detailed design of concerned activities. For targeting, WFP will be expected to utilize its own systems and coordination among humanitarian and UN agencies to optimize the scarce resources for highest possible coverage and avoid multiple food security support benefits concentrated in the same households. In order to strengthen monitoring, transparency and citizen engagement, Third Party Monitoring (TPM) are being engaged and will provide an independent review of such aspects. In addition, WFP systems appropriate to the conflict situation, including for targeting of, distribution to, and feedback back from beneficiaries will be included in the Project Operational Manual (POM) and used. The risks of exclusion of comparatively more marginalized groups will also be addressed through proper implementation of the SEP that has been prepared for AFII.



The AFII SEP includes details of the WFP GM system that is already operational for other WFP projects, and this GM system will also be used for AFII. This GM also includes features to address complaints related to SEA/SH/GBV, from beneficiaries and workers, and has a working arrangement with a local partner NGO for referrals. Finally, the WFP and PCU ESO's capacity to address environmental and social risks, including for handling of grievances, will be enhanced throughout the life of the project through regular capacity building.

The Terms of Reference (ToR) for the TPM provides for an independent review of project implementation and verification of project results and adherence to all Environmental & Social requirements committed to in the ESCP and all ESHS instruments, including through, inter alia: periodic site visits, assessment of local context and conditions, interviews, awareness raising, training and preparation of reports.

The ESMF for the parent project will be updated and used for AFII. The updated ESMF will also include updated CHSMM to address crowd management, road and traffic safety, and food safety in accordance with WFP guidelines and ESF requirements. Considering that use of a 'framework' approach is still not confirmed, the parent project ESMF will address risks relevant to the parent project activities. ESHS measures and reference to the project ESCP will be included in the in E&S Section under the Outputs Standard Form of Agreement (SFA)

The Parent Project/AF I ESCP has been updated for AFII and includes (among other aspects) the E&S institutional requirements at the WFP, updating of the ESF instruments for AFII, third party monitoring requirements, inclusion of E&S aspects in the SFA, and capacity building needs during implementation. The updated ESCP will be made part of the legal agreement between the Bank and The Palestine Liberation Organization (for the benefit of the Palestinian Authority) and will guide the arrangements for ESF implementation between the MoF and the WFP. The updated ESCP will be finalized and cleared by the Bank and disclosed by project appraisal.

ESS2 Labor and Working Conditions

Relevant

Categories of workers involved in the project include: i. direct workers including MOF/PCU staff (e.g. the ESO and H&SO); ii. contracted workers including WFP assigned staff and consultants of NGOs (e.g. Global Communities and ACTED) implementing the emergency cash or in-kind support, shopkeepers of WFP authorized shops; and iii. community workers including volunteers supporting WFP and NGOs in reaching out to project beneficiaries. The project will not involve primary supply workers.

Potential labor risks are related to occupational health and safety (OHS), working terms and conditions, and SEA/SH risks for workers. These risks will be assessed and managed in accordance with the parent project LMP that will be updated to be used for AF II. The parent project LMP covers an assessment of potential labor-related risks; an overview of labor regulations, policies, and procedures; an assessment of and a plan to prevent SEA/SH proportionate to the level of risk; contract terms and conditions of employment; working age regulations; measures to prevent and address harassment; provisions for non-discrimination and equal opportunity in the workplace; OHS for workers; details of the workers' GM; and other requirements of ESS2. Any new labor risks/issues related to AFII and the current situation in Gaza will be addressed in the LMP updated for AFII. There are currently no risks of child and/or forced labor under the project.



Direct workers' GM established by MoF under the parent and the first AF project shall continue to be applicable for the AF II and shall be maintained throughout the implementation of the project. The WFP already has and shall use the same GM for their workers under AFII to cover project activities. The GM has been described in the SEP and will also be include in the updated LMP for AFII. The GM is consistent with requirements under relevant national law and ESS2. The workers' GM also addresses potential complaints related to SEA/SH and has requisite features such as ability to accept and respond to anonymous complaints and measures to ensure anonymity of complainants, referral mechanisms, and availability of trained personnel to accept and handle such complaints. WFP already includes CoC with measures to prevent SEA/SH in contracts with workers/contracted organizations and these CoCs will also be used for workers engaged for AFII. All AFII workers will sign the CoC and will be provided awareness and training about the measures/requirements of the CoC.

Finally, in addition to the project workers identified above, some employees of MoF may also work in connection (fulltime or part-time) with the project without being formally transferred to the project. ESS2 will not apply to such workers, and they will remain subject to the terms and conditions of their employment with the concerned agency. However, the provisions of ESS2 related to protection in the workforce (i.e. regarding child labor, minimum age, and forced labor) and OHS will apply to such agency employees.

ESS3 Resource Efficiency and Pollution Prevention and Management

Relevant

Relevant

While the Parent Project and the AFI had activities assessed to have risks and impacts relevant to ESS3, the AFII activities are not expected to consume natural resources, generation of waste is anticipated of low risk relevant to the main distribution unboxing, which is negligible in comparison to the accumulation of solid waste in the streets due to the failure of the solid waste management services in the Gaza Strip. However, WFP procedures to manage solid waste management will be included in the updated ESMF and reflected in the E&S clauses of the SFA and implemented where applicable

ESS4 Community Health and Safety

The main community health and safety risks identified under the AFII are related to potential exposure of beneficiaries, especially the more vulnerable such as the elderly, young children, persons with disabilities (particularly women and girls) etc., to accidents/incidents or violence during situations of poor crowd management at in-kind/cash support distribution points/WFP shops; security related risks if distribution points are targeted during a break in ceasefire; life and fire safety risks at appointed facilities; and potential risks of SEA/SH/GBV for women (especially women heads of households, women with disabilities) and girls by shopkeepers/workers at distribution points.

Measures to address life and fire safety and additional features of community health and safety are already included in the parent project ESMF and will be implemented as required for AFII. In addition, crowd management measures will be included in the community health and safety measures in the updated ESMF. Similarly, WFP road and traffic safety guidelines will be incorporated in the updated ESMF and SFA and implemented throughout AF II implementation. The SFA between MoF and the WFP shall include food safety standards.

To address the risk of SEA/SH/GBV various measures will be implemented including: CoCs for WFP workers, including those working at shops. WFP already uses CoCs in their contracts with shops/local partners and these will be used for AFII and application monitored; workers will be provided awareness raising and training on the CoC and made aware of



relevant accountability measures; the WFP GM system already has features to address SEA/SH/GBV features, such as referral mechanisms, includes confidential reporting and ethical documentation of GBV/ SEA/SH cases etc., community members/beneficiaries will be made aware of the GM and how to access and use it in a manner that is accessible for all, including vulnerable groups. The GM will be monitored regularly and, personnel responsible for accepting SEA/SH/GBV related complaints in the GM system will be provided training/capacity building, as required, to ensure effectiveness of the system. Details of the SEA/SH/GBV measures will be included in the SEA/SH Action Plan, as part of the updated ESMF, that will be prepared within one month of project effectiveness date.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement No land acquisition and or involuntary resettlement is required under the project.	Not Currently Relevant
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not Currently Relevant
No construction activities are expected in this project that could affect protected areas, flora or	r fauna.
ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Currently Relevant
No population groups meeting the definition of ESS7 have been identified in the project area.	
ESS8 Cultural Heritage	Not Currently Relevant
No tangible or untangle cultural heritage will be impacted by the project activities.	
ESS9 Financial Intermediaries	Not Currently Relevant
There are no financial intermediaries that are part of the project.	

The project's affected parties under Sub-Component 1.1 include: beneficiaries of the in-kind/cash support and the poor in the WFP distribution list/database.

ESS10 Stakeholder Engagement and Information Disclosure

Parties interested in the project include (but are not limited to): household members of those benefiting from cash or in-kind transfers; the project implementing agency, WFP; government agencies such as MoF and MoSD; UN agencies such as UNRWA, UNFPA; the private sector including shops that cooperate with WFP (around 200 shops across Gaza) and potentially new identified shops and supermarkets that will be acting as in-kind distribution points; international humanitarian agencies and NGOs such as Global Communities and ACTED; Community Based Organizations (CBOs) working on women, children and disability issues and youth organizations/networks such as Sharek; and, the media.

Vulnerable or marginalized groups impacted by the project include (but are not limited to): poor households and households vulnerable to poverty; unemployed and poor community members who lost their source of living due to the conflict (i.e. displaced persons, refugees, Bedouin communities); people injured in the conflict and/or who lost their

Relevant



breadwinner due to the current conflict including women, youth, children, elderly, people with pre-existing medical conditions and disabilities; and, people living in remote and rural locations and in Access Reduced Areas (ARAs)

A SEP has been prepared for AFII in line with the requirements of ESS10 and will be implemented throughout the project. The AF II SEP includes measures for stakeholder consultation, information dissemination and disclosure, and grievance redress. The SEP also includes a comprehensive identification of various categories of stakeholders and a methodology for ongoing information sharing and disclosure and consultation with all stakeholders, including marginalized groups, to ensure that all stakeholders are engaged throughout the life of the project. The SEP also provides details of the project GM already established (and functional) by WFP and MOF to raise concerns and lodge grievances. Both GM systems include measures to address any SEA/SH/GBV related complaints, including survivors' referral mechanisms.

The SEP was consulted virtually on November 07, 2023 and details of the consultation have been included in the document. Participants included representatives of: several NGOs and CBOs working with women (e.g. SAWA), youth and children (e.g. War Child), INGOs (e.g. MAP, ACTED, ANERA and Care International), and UN and government agencies (e.g., MoF and UNFPA). Over 22 participants joined the discussion and a complete list is included in the SEP. Participants highlighted several issues such as selection criteria for beneficiaries; mechanisms for engaging beneficiaries; and integration of instruments for monitoring and outreach in the project design. Participants inquired about the databases maintained by the Ministry of Labor (MoL) and the Ministry of Social Development (MoSD) for identifying vulnerable individuals and discussed the challenge associated with conducting field assessments for potential beneficiaries under the current situation. Participants also raised concerns of potential exclusion of individuals based on geographic locations, particularly in Northern and Southern parts of Gaza, given the current conflict in addition to social tension that may occur during the distribution of food parcels. Participants expressed their interest in participating in follow-up engagement meetings to stay updated on project development and progress. Participants were informed that their suggestions will be considered as appropriate and that the emphasis of the project is to provide urgent humanitarian assistance to Gaza. Participants were also assured that consultation will continue throughout project implementation, including in Gaza as soon as the situation allows.

The SEP has been reviewed and cleared by the Bank and will be disclosed by 19 November 2023. The SEP will also be available in Arabic prior to implementation.

The SEP is a 'living' document and hence, can be updated periodically during program implementation. The ESCP includes the condition for updating the SEP, as required, during program implementation.

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

B.2 Legal Operational Policies that Apply



B.3 Other Salient Features							
Use of Borrower Framework							
Use of Borrower Framework is not being considered							
Use of Common Approach							
N/A							
C. Overview of Required Environmen	tal and Social Risk Man	agement Activities					
C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required during implementation?							
 Updated ESMF, also including Community Health and Safety Measures, SEA/SH Action Plan Updated LMP 							
III. CONTACT POINTS							
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Public Disclosure