

# **The Palestinian Liberation Organization (for the benefit of the Palestinian Authority)**

**Additional Financing for the Technology for Youth and Jobs Project  
(TechStart) - P180125**

**Appraisal version**  
**ENVIRONMENTAL AND SOCIAL  
COMMITMENT PLAN (ESCP)**

**November 30, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The Palestine Liberation Organization (for the benefit of the Palestinian Authority) (the Recipient) will implement the Additional Financing for the Technology for Youth and Jobs Project (TechStart), hereinafter (the Project), with the involvement of the Ministry of Telecommunications and Information Technology (MTIT), and DAI, a private sector entity, contracted by the Recipient to act as Project Implementation Agency (PIA). The International Development Association hereinafter (the Association), acting as administrator of the Trust Fund for Gaza and West Bank, has agreed to provide the original financing (P P172571) and additional financing (P180125) for the Project. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above. .
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP) , all in a manner acceptable to the Association. The ESCP is a part of the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient, shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient or delegate(s). The Recipient shall promptly disclose the updated ESCP.

| MATERIAL MEASURES AND ACTIONS   |   | TIMEFRAME   | RESPONSIBLE ENTITY/AUTHORITY |
|---------------------------------|---|---|------------------------------|
| <b>MONITORING AND REPORTING</b> |   |   |                              |
| A                               | <p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, Labor Management Procedures, and functioning of the grievance mechanism(s)</p>   | Starting from the AF Effective Date (April 10, 2023), quarterly reports shall be submitted throughout the project implementation  | PIA                          |
| B                               | <p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries.</p> <p>Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p> | <p>Notify the World Bank no later than 48 hours after learning of the incident or accident from PIA/MTIT/suppliers</p> <p>Fatalities shall be reported within 24 hours after occurrence.</p> <p>Provide subsequent report to the World Bank within a timeframe acceptable to the World Bank</p> | PIA                          |
| C                               | <p><b>BENEFITING COMPANIES MONTHLY REPORTS</b></p> <p>Require benefiting companies to provide monthly reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports</p>  | Submit the monthly reports to the World Bank upon request and annexes to the reports to be submitted under action A above   | PIA                          |

| MATERIAL MEASURES AND ACTIONS   |  | TIMEFRAME  | RESPONSIBLE ENTITY/AUTHORITY |
|---|--|--|------------------------------|
| D   | <p><b>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF BENEFITING COMPANY COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</b></p> <p>Notify the World Bank of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor's obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the World Bank of: (i) the DAAB's decision on such referral; (ii) the contractor's Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB's decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p> | No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, Issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable). | PIA                          |
| <b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b> |  |  |                              |
| 1.1   | <p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The PIA for the parent Project shall also serve as the implementing Agency for the AF. The Environmental and Social Officer (ESO) who is implementing the parent project shall continue to support the management, monitoring and supervision of environmental and social risks and impacts of the Project. The ESO is currently part time and the need to change this to a full-time position will be assessed during AF implementation and the position will be upgraded if required.</p>  | An organizational structure including the ESO should be maintained throughout Project implementation.  | PIA                          |

| MATERIAL MEASURES AND ACTIONS |   | TIMEFRAME  | RESPONSIBLE ENTITY/AUTHORITY |
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| 1.2                           | <p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>a. The ESMF of the parent project to be updated, consulted, cleared, disclosed, and implemented for the AF Project.</p> <p>b. Screen any proposed subproject in accordance with the updated ESMF prepared for the Project and, thereafter, draft, adopt, and implement the subproject Environmental and Social Management Plan (ESMP) or other measures or procedures and guidelines of proposed Project activities in accordance with the ESMF, the Environmental and Social Standards (ESSs), the Environmental, Health and Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP).</p> <p>c. Prepare, disclose, adopt, and implement any ESMPs or other E&amp;S measures or instruments required for the subprojects and eventually implemented by ITC Service Companies as per the Project ESMF, in a manner acceptable to the Association once subprojects are identified.</p> <p>d. Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required Environmental, Social, Health and Safety (ESHS) measures, into the ESHS specifications of the procurement documents and ITC Service Companies. Thereafter ensure that the ITC Service Companies comply with the ESHS specifications of their respective contracts.</p> | <p>a. The updated ESMF shall be prepared and disclosed by the AF Appraisal (December 23, 2022) and implemented thereafter during Project implementation.</p> <p>b. During project implementation.</p> <p>c. ESMP or other instruments required for the subprojects shall be prepared, consulted, completed and disclosed prior to final decisions on legal reforms to which these instruments relate.</p> <p>d. During project implementation.</p> | PIA                          |
| 1.3                           | <p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant E&amp;S requirements (including ESHS specifications, codes of good conduct, commitments on child labor and GBV/SEA/SH, reporting and monitoring, and grievance mechanisms) in the procurement/bidding documents/grant agreement. Thereafter ensure that these requirements are implemented.</p> <p>All suppliers for equipment should be authorized suppliers/providers with legal documents to operate.</p>  | During preparation of bidding documents/Request for proposal (RFP)/preparation of grant agreements.  | PIA                          |

| MATERIAL MEASURES AND ACTIONS              |  | TIMEFRAME  | RESPONSIBLE ENTITY/AUTHORITY |
|--|--|--|------------------------------|
| 1.4  | <p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the technical assistance and capacity building activities to build both general good managerial practices as well as those required specifically by existing and potential clients are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>  | Throughout Project implementation.   | PIA                          |
| 1.5  | <p><b>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</b></p> <p>N.A</p>   | N.A.   | N.A.                         |
| 1.6  | <p><b>ASSOCIATED FACILITIES</b></p> <p>Associated Facilities are assessed as irrelevant to the project components.</p>   | N.A  | N.A                          |
| <b>ESS 2: LABOR AND WORKING CONDITIONS</b> |  |  |                              |
| 2.1  | <p>Labor Management Procedures (LMP) for the parent project shall be updated to reflect the AF, consulted on, disclosed, implemented, monitored and evaluated throughout Project implementation. The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, the LMP, and implementing adequate occupational health and safety (OHS) measures (including personal protective equipment and emergency preparedness and response measures), setting out grievance arrangements for Project workers including SEA/SH complaints, and incorporating labor requirements into the ESHS specifications of the procurement documents and grant agreements with ITC Service Companies.</p> | LMP shall be updated, consulted on and disclosed by the AF Appraisal (23 December 2022) and implemented throughout AF Project implementation | PIA                          |

| MATERIAL MEASURES AND ACTIONS   |  | TIMEFRAME   | RESPONSIBLE ENTITY/AUTHORITY |
|---|--|---|------------------------------|
| 2.2   | <p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>a. Workers' grievance mechanism (GM) established under the parent project shall continue to be applicable for the AF and shall be maintained throughout the implementation of the project.</p> <p>b. The ITC Service Companies shall put in place a GM for their workers to cover subproject activities as described in the LMP and consistent with requirements under relevant national law and ESS2, and maintained and operated for the Project, in a manner acceptable to the Association. The ITC Service Companies workers' GM shall receive and lodge workers' complaints, concerns, and difficulties, including grievances related to compensation, discrimination, OHS concerns, SEA/SH, and any others as described in the updated LMP.</p> | <p>a. Maintain throughout the Project implementation.</p> <p>b. Starting after signing the contract(s) with the ITC Service Companies and maintain throughout the Project implementation.</p> | PIA                          |
| 2.3   | <p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>The Subprojects shall be carried out in accordance with the Occupational Health and Safety (OHS) measures in line with the ESMF and LMP in a manner acceptable to the Association.</p>  | The OHS measures shall be implemented throughout Project implementation.  | PIA                          |
| <b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> |  |   |                              |
| 3.1   | <p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b></p> <p>Adopt, and implement the e-waste management plan prepared for the parent project for the AF Project.</p>   | Throughout the Project implementation   | PIA                          |
| 3.2   | <p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action [1.2] above.</p>   | When preparation the ESMPs and maintain throughout Project implementation.  | PIA                          |
| <b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>                                 |  |   |                              |
| 4.1   | <p><b>TRAFFIC AND ROAD SAFETY:</b></p> <p>N.A</p>  | N.A   | N.A                          |
| 4.2   | <p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>No risks on community health and safety related to the Project activities.</p>   | N.A   | N.A                          |

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| 4.3   | <b>GBV AND SEA RISKS:</b><br>Adopt, implement and monitor GBV and SEA mitigation measures identified in ESMF and LMP.   | Prior to initiating of subproject and maintained throughout Project implementation. | PIA |
| 4.4   | <b>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</b><br>Integrate grievance redress features for GBV and SEA/SH related complaints in the project GM to track complaints related to GBV and SEA. | Prior to initiating of subproject and maintained throughout Project implementation. | PIA |
| 4.4   | <b>SECURITY PERSONNEL:</b><br>No security personnel is expected to work in the Project.   |   |     |
| <b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>                       |   |   |     |
| 5.1   | <b>RESETTLEMENT PLANS:</b><br>ESS5 is not relevant. No land acquisition or resettlement is anticipated under the project  |   |     |
| 5.2   | <b>GRIEVANCE MECHANISM</b><br>N.A   |   |     |
| <b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>              |   |   |     |
| 6.1   | <b>BIODIVERSITY RISKS AND IMPACTS:</b><br>N.A   |   |     |
| <b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b> |   |   |     |
| 7.1   | <b>INDIGENOUS PEOPLES PLAN:</b><br>N.A  |   |     |
| 7.2   | <b>GRIEVANCE MECHANISM:</b><br>N.A  |   |     |
| <b>ESS 8: CULTURAL HERITAGE</b>   |   |   |     |
| 8.1   | <b>CHANCE FINDS:</b><br>N.A   |   |     |
| <b>ESS 9: FINANCIAL INTERMEDIARIES</b>  |   |   |     |
| 9.1   | N.A   |   |     |
| <b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>  |   |   |     |



|                                    |  |   |            |
|------------------------------------|--|---|------------|
| 10.1                               | <p><b>SEP PREPARATION AND IMPLEMENTATION:</b></p> <p>a. A Stakeholder Engagement Plan (SEP) has been prepared (by updating the SEP for the parent project) and will be used for the AF. The SEP will be disclosed and implemented throughout the project.</p> <p>b. Report back to stakeholders according to the mechanisms prescribed in the updated SEP.</p>   | <p>a. The AF SEP shall be disclosed by Appraisal (December 23, 2022).</p> <p>b. Quarterly reports on the implementation of the SEP shall be provided to the Association, starting from the Effective Date and throughout Project implementation. Annual reports shall be prepared and shared with the Association for review and approval throughout Project implementation</p> | PIA        |
| 10.2                               | <p><b>PROJECT GRIEVANCE MECHANISM:</b></p> <p>The grievance mechanism (GM) that was developed for the parent project shall remain accessible and functional to receive and facilitate the resolution of concerns and grievances in relation to the AF Project in accordance with ESS10 and in a manner acceptable to the Association. Adequate resources shall be provided for the continued operation of the GM. The GM shall also receive, register and address concerns and grievances related to GBV/SEA/SH in a safe and confidential manner, including through the referral of survivors to gender-based violence support service providers.</p> | The GM is operational and shall be maintained throughout the implementation of the Project.   | PIA        |
| <b>CAPACITY SUPPORT (TRAINING)</b> |  |   |            |
| CS1                                | <p><b>The ESO at PIA will provide training to ITC Service Companies on:</b></p> <ul style="list-style-type: none"> <li>• Environmental and Social Assessment and Environmental and Social Management Plans</li> <li>• Environmental and social monitoring and reporting</li> <li>• Emergency preparedness and response</li> <li>• Stakeholder mapping and engagement</li> <li>• Grievance Mechanisms</li> <li>• Prevention and response to potential cases of SEA/SH.</li> </ul>   | An annual training program and calendar shall be prepared at the beginning of each year and shared with the Association and training shall be conducted based on the agreed annual training plan.   | ESO at PIA |