Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 09/05/2019 | Report No: ESRSC00572
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Bank and Gaza</td>
<td>MIDDLE EAST AND NORTH AFRICA</td>
<td>P168295</td>
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</tbody>
</table>

Project Name: Improving Early Childhood Development in the West Bank and Gaza

Practice Area (Lead): Education

Financing Instrument: Investment Project Financing

Estimated Appraisal Date: 10/14/2019

Estimated Board Date: 12/16/2019

Borrower(s): Palestine Liberation Organization

Implementing Agency(ies):
- Ministry of Education and Higher Education
- Ministry of Health

Proposed Development Objective(s):

Improve the coverage and quality of early childhood development services for children from gestation until age 5 in the West Bank and Gaza.

Financing (in USD Million)

<table>
<thead>
<tr>
<th>Total Project Cost</th>
<th>Amount</th>
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<tbody>
<tr>
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<td>9.00</td>
</tr>
</tbody>
</table>

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

No

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

The project aims to improve the coverage and quality of early childhood development (ECD) services in the West Bank and Gaza, by strengthening early healthcare and nutrition of pregnant women and infants, enhancing parenting practices that promote children's early stimulation, increasing access to high-quality kindergarten services, and strengthening multi-sectoral coordination for planning and delivery of ECD services.
D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The project is nationwide, covering communities in both West Bank and Gaza. Component 1 aims to strengthen early healthcare, nutrition and stimulation services provided to Palestinian children from gestation to 48 months. This component is likely to include supply and installation of new healthcare equipment, programs to improve nutrition and baby formula to targeted communities. Component 2 aims to improve access to high quality kindergarten services. Subcomponent 2.1 aims to expand access to Kindergarten education via construction of new KG classrooms, rehabilitation of existing classrooms, possibly supply and installation of supporting facilities such as play areas and kitchen facilities. The exact locations of the targeted schools will be determined via a mapping exercise for the location and capacity of existing public and private KG2 classrooms to construct the supply. The exercise will be overlaid with a poverty map, providing additional information on how best to target the most vulnerable populations.

D. 2. Borrower’s Institutional Capacity

The project is multi sectoral, including the Ministry of Education, Health, and Social Development. Given the high capacity of the PIU overseeing the education projects financed by the Bank and overall high institutional capacity of the Ministry of Education, the MOEHE will have the primary responsibility for project implementation and ensuring compliance with the Bank’s procedures and guidelines. The MOEHE will closely coordinate efforts with the Ministry of Health and Ministry of Social Development for the implementation of specific activities related to the health and social sectors. The PIUs role in the past has been limited to provide oversight and monitoring of the procurement and financial management of the projects and the PIU is staffed mainly with qualified financial and procurement specialists, given the fact previous projects have been category "C" according to OP 4.01 with no activities of significant environmental impacts. Therefore, there are no environmental or social specialists onboard the PIU and the staff existing staff has little or no previous experience in the Social or Environmental Safeguards or the new Bank’s ESF framework. The institutional capacity of the PIU currently managing the Bank’s education projects was assessed with regards to their GRM system, consultation, and overall safeguards capacity to be limited. On the ministry level, it was found that consultations and citizen engagement are not systematically applied to all projects. Departments involved in the implementation of projects have conducted occasional consultations with stakeholders for certain activities, e.g., preparation of the National Strategy for Early Childhood Development and Intervention. There is a Complaints Unit in each of the three ministries. The units are part of the ministries organizational structure and administered by a Head of Department and equipped with trained staff. The Complaints Unit work is regulated by the Council of Ministers Decision No (8). As part of Capacity Development, the MOEHE will recruit an Environmental and Social Officer who will oversee the implementation of the Environmental and Social Management Framework (ESMF), prepare site-specific ESMPs for the construction locations, and ensure contractors compliance.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Moderate

The project is classified as Moderate Risk, given the combination of environmental and social impacts of the project activities in the education and health sectors, and the limited existing capacity for environmental and social risk management within the existing PIU and the concerned ministries. The environmental impacts are related to the construction of new KG classrooms within the existing footprint of selected schools in West Bank and Gaza, rehabilitation of existing classrooms, possibly installation of furniture and play equipment, the occupational health
and safety for the operation of supplied medical equipment, and possibly medical waste generated. All these aspects will be examined in detail at the appraisal stage.

**Social Risk Rating**

Moderate

On the social side, the project will overall have positive impacts. The class room construction under component 2 will be done within the exiting footprint of the existing schools, therefore it is unlikely that any land acquisition will be involved. This will be further assessed during project preparation. Considering the project will be nation wide there could be some vulnerable groups and communities in the project area. If the case, special attention will be paid to the needs and concerns of these communities. Stakeholder Engagement Framework (SEF) will consider vulnerable groups and communities that could be in the project areas and provide mechanisms that ensure their full participation. The potential social risks are related to exclusion of intended beneficiaries who do not seek services at PHCs, this risk is low since over 90% of the women do seek maternal health within 2 days of giving birth but still those who do not seek the services could be excluded. Another potential exclusion relates to the private KG2 providers. In general, private sector is the provider of 90% of the KG2 classrooms and since one of the components of this project is assistance for expansion and development of KG2 classrooms, those private sector providers that are not registered due to cost involved could be excluded from the project benefits, including children using private KGs. Finally, the GRM systems within the existing ministries and PIU s. as noted above, are not functioning well. Therefore, some gap filling measures, as explained above, are needed.

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

**B.1. General Assessment**

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

*Overview of the relevance of the Standard for the Project:* The project has education and health components which include activities of construction and rehabilitation of KG classrooms in schools, possibly supply of furniture, play areas and kitchen, and supply of equipment to improve health care to mothers and infants in selected clinics. Those activities entail construction risks, and OHS impacts that need to be managed. The construction activities will most likely be conducted by local contractors and labor management aspects are discussed further under ESS2. The community health and safety will be further assessed in ESS4. It is unlikely the project will involve land acquisition; more details will be given under ESS5. Details on stakeholder engagement, consultations, and GRM will be addressed under ESS10. Client is currently preparing an Environmental and Social Management Framework (ESMF) which will set the rules for implementation. The ESMF is being prepared and consulted among stakeholders of the project and will be disclosed by project appraisal. During implementation, site-specific ESMPs will be prepared for each construction location.

*Areas where “Use of Borrower Framework” is being considered:* West Bank and Gaza’s E&S Framework is not being proposed to be applied in whole or in part for this project. The EIA policy of the PA coincides with most of the provisions of ESS1. However, projects are categorized either with high environmental impacts where a full-fledge EIA is required by the Environment Quality Authority, or minor impacts where an elementary environmental assessment is required. The scope of coverage of EIA depends on the type of the project, however, several aspects covered by the environmental and social standards are not covered, particularly the social impacts.
ESS10 Stakeholder Engagement and Information Disclosure
The primary project stakeholders will involve beneficiaries (including pregnant women, children from prenatal through age 5), primary health care providers, teachers, schools, three ministries involved in the project implementation, and private sector providers of KG. Consultations with different stakeholders will be carried out as part of the project preparation, including the preparation of the ESMF, and the findings of the consultation will be integrated into the project design. Stakeholder engagement plan will be developed prior to project appraisal.

B.2. Specific Risks and Impacts
A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions
Types of Labor involved in the project: Direct Workers employed directly by the client for project implementation and Contracted workers through third party contracts for implementation of civil works in schools and clinics. The construction of new KG classrooms, rehabilitation of existing classrooms, supply and installation of KG equipment, kitchen, and playgrounds, supply and installation of medical equipment at primary healthcare clinics, will most likely be conducted via local contractors. Therefore, the provisions of this ESS2 will apply to these contracts and will be part of the bidding documents and specifications, particularly the OHS aspects to construction workers and operators of healthcare equipment.

ESS3 Resource Efficiency and Pollution Prevention and Management
The construction and rehabilitation activities of classrooms are expected to generate solid waste and the provisions of the contracts will entail proper and safe disposal of construction solid waste. The nature and quantities of medical waste (if any) will be further assessed and proper measures for safe disposal will be determined in the ESMF.

ESS4 Community Health and Safety
The construction activities for KG classrooms (new construction and rehabilitation) will take place within the existing footprint of schools, most likely during schooling year. All measures to ensure safety of school kids and the surrounding communities should be ensured to prevent any accidents or injuries. All construction materials, paintings, electrical and mechanical equipment, playgrounds, shall comply with safety standards for school kids.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
At this stage, ESS5 is not expected to be relevant to the project. The expansion of KG classrooms in schools will be done within the existing footprints of schools, no land acquisition is expected. However, given the coverage of the project and the fact that not all schools are identified then based on the mapping exercise the relevance of this standard will be further assessed during preparation and implementation. If it shows that it would be relevant then appropriate instrument will be prepared.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
ESS6 is not relevant to this project given the fact project activities are conducted in urban areas, within the existing footprints of schools and healthcare clinic. No Forests or natural habitats will be affected by the project activities.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
At this stage, this ESS7 is not expected to be relevant to the project as there are not known Indigenous People present in the project area.

ESS8 Cultural Heritage
At this stage, ESS8 is not expected to be relevant to the project, project activities are not expected to affect tangible or non-tangible cultural heritage.

ESS9 Financial Intermediaries
ESS9 is not expected to be relevant to the project given the fact all project activities are implemented by the PA line ministries and no FI are involved.

C. Legal Operational Policies that Apply

<table>
<thead>
<tr>
<th>Operational Policy</th>
<th>Applicable</th>
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<tbody>
<tr>
<td>OP 7.50 Projects on International Waterways</td>
<td>No</td>
</tr>
<tr>
<td>No international waterways will be impacted by project activities</td>
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<tr>
<td>OP 7.60 Projects in Disputed Areas</td>
<td>No</td>
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<tr>
<td>Project activities are conducted in the communities of West Bank Gaza under the PA authority and will not have impacts on the legal status of the PA or the territories under its jurisdiction</td>
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III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners
No financing partners identified at the moment.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:
(i) preparation of Environmental and Social Framework by project appraisal, the ESMF includes labor management, GRM, and consultations (ii) preparation of a stakeholder engagement plan (SEP) by appraisal.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
(i) preparation and implementation of site specific ESMPs during project implementation; (ii) implementation of SEP; (iii) inclusion of relevant provisions of ESMPs and labor management procedures in the bidding documents and
contract with contractors, (iv) as part of Capacity Development, the MOEHE will recruit an Environmental and Social Officer who will oversee the implementation of the Environmental and Social Management Framework (ESMF), prepare site-specific ESMPs for the construction locations, and ensure contractors compliance.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

IV. CONTACT POINTS

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Borrower/Client/Recipient
Borrower: Palestine Liberation Organization

Implementing Agency(ies)
Implementing Agency: Ministry of Education and Higher Education
Implementing Agency: Ministry of Health

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Samira Ahmed Hillis, Samira Nikaein Towfighian
Practice Manager (ENR/Social) Lia Carol Sieghart Recommended on 13-Aug-2019 at 16:11:39 EDT
Safeguards Advisor ESSA Nina Chee (SAESSA) Cleared on 05-Sep-2019 at 15:33:5 EDT