

# **Al-Wafa Plastic Industries (WPI)**

## **- Thermoforming Expansion Subproject –**

Hebron City – Abu De'Jan

# **Environmental and Social Management Plan (ESMP)**

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## Contents

Executive Summary .....	VIII
1. Introduction .....	1
1.1. Background.....	1
1.2. Justification for the Environmental and Social Management Plan.....	2
1.3. ESMP Scope and Objective.....	2
1.4. Beneficiary Overview: Al-Wafa Plastic Industries.....	3
2. Project Description .....	4
2.1. Existing Production Facilities.....	4
2.1.1. Overview .....	4
2.1.2. Resource Usage and Waste Production.....	6
2.2. Previous Environmental Assessments .....	6
2.3. Expansion Project.....	7
2.3.1. Overview .....	7
2.3.2. Thermoforming.....	7
2.3.3. Expansion Project Planned Activities .....	8
2.4. Project Cost and F4J II Proposed Support .....	9
2.5. Project Workers .....	9
3. Policies, Legal, and Regulatory Frameworks.....	10
3.1. Palestinian National Laws and Legislations.....	10
3.2. Palestinian Standards Institute Mandatory Specifications .....	11
3.2.1. General Overview of PSI Mandatory Specifications for Food Production .....	11
3.2.2. PSI Mandatory Specifications on Plastic Material and Substances Intended to Come in Contact with Foodstuff.....	11
3.2.3. PSI Mandatory Specifications on Material and Equipment in Contact with Foodstuff	12
3.3. World Bank Operational Policies and Bank Procedures .....	12
3.3.1. World Bank OP/BP 4.01 on Environmental Assessment.....	12
3.4. Environment, Health, and Safety Guidelines .....	13
3.4.1. General EHS Guidelines .....	13
3.4.2. Industry-Specific EHS Guidelines .....	13
4. Baseline Data .....	13
4.1. Project Location .....	14
4.2. Locality Overview.....	15
4.3. Land Use.....	15
4.4. Biota .....	18
4.4.1. Flora.....	18

4.4.2.	Fauna .....	18
4.4.3.	Protected Areas .....	19
4.5.	Topography .....	19
4.6.	Geology & Pedology .....	20
4.7.	Climate .....	21
4.8.	Water Sources .....	22
4.9.	Wastewater .....	23
4.10.	Electricity Services .....	23
4.11.	Air Quality and Noise .....	23
4.12.	Solid Waste .....	24
4.13.	Socio-economic situation .....	25
4.14.	Historical & Cultural Heritage .....	25
5.	Assessment of Existing E&S Capacity .....	27
6.	Potential Environmental and Social Impacts and Proposed Mitigation Measures .....	27
6.1.	Project Anticipated Positive Impacts .....	28
6.2.	Planning and Procurement Phase .....	28
6.3.	Impacts on Air Quality .....	28
6.4.	Noise .....	31
6.5.	Traffic and Vehicular Movement .....	33
6.6.	Visual Impacts .....	34
6.7.	Solid Waste .....	35
6.8.	Hazardous Material and Waste .....	36
6.9.	Labor Rights .....	37
6.10.	Occupational Health and Safety .....	40
6.11.	Life and Fire Safety .....	43
6.12.	Community Health and Safety .....	44
6.13.	Gender Based Violence .....	45
6.14.	Summary of Environmental and Social Risks .....	47
7.	Environmental and Social Management Matrix .....	48
8.	Institutional Arrangements .....	68
8.1.	Demarcation of Responsibilities .....	68
8.1.1.	Al-Wafa Plastic Industries .....	68
8.1.2.	The PIA .....	68
8.1.3.	Contractors and Suppliers .....	68
8.2.	Contractors' Duties and Responsibilities During the Installation Phase .....	69
8.3.	Bidding Documents Environmental and Social Clauses .....	70
8.4.	Monitoring and Reporting .....	71

8.4.1. Monitoring.....	71
8.4.2. Reporting .....	72
8.4.3. Incident Reporting.....	72
9. Stakeholder Engagement and Information Disclosure.....	73
9.1. The Project Stakeholders.....	73
9.2. Conducted Stakeholder Engagement Activities.....	73
9.3. Information Disclosure .....	75
10. Grievance Mechanism .....	75
11. Budgetary Requirements.....	77
ANNEX I: Code of Conduct Sample .....	79
ANNEX II: Grievance Redress Mechanism .....	84

**List of Tables**

Table 1: Expansion Project Activities.....	7
Table 3: Population Percentage Working in Economic Sectors.....	25
Table 4: Summary of Environmental and Social Risks .....	47
Table 6: Environmental and Social Management Matrix During Installation Phase .....	52
Table 7: Environmental and Social Management Matrix During Operations .....	58
Table 8: Stakeholder Engagement Summary .....	74
Table 9: Cost Estimate of the Implementation of the ESMP .....	77

**List of Figures**

Figure 1: Map of Al-Wafa Factory and Premises.....	4
Figure 2: Al-Wafa Plastic Industries Existing Facilities (top left: Existing Factory, top right: Storage area, Bottom: Existing production lines).....	5
Figure 3: Map of Al-Wafa Factory and Premises.....	<b>Error! Bookmark not defined.</b>
Figure 4: Samples of the Company's Plastic Products.....	<b>Error! Bookmark not defined.</b>
Figure 5: HDPI Blowing Production Line and Sample Products.....	<b>Error! Bookmark not defined.</b>
Figure 6: HDPE Blow Molding Process Chart.....	<b>Error! Bookmark not defined.</b>
Figure 7: Injection Stretch Blow Molding Production Machine and Product Samples.....	<b>Error! Bookmark not defined.</b>

Figure 8: ISBM Process Description.....	<b>Error! Bookmark not defined.</b>
Figure 9: Injection Compression Molding Machine and Product Samples	<b>Error! Bookmark not defined.</b>
Figure 10: Compression Molding Process Chart .....	<b>Error! Bookmark not defined.</b>
Figure 11: Granulator .....	<b>Error! Bookmark not defined.</b>
Figure 12: Shredder at WPI .....	<b>Error! Bookmark not defined.</b>
Figure 13: Mold Labelling Machine .....	<b>Error! Bookmark not defined.</b>
Figure 14: Thermoforming Process Description .....	8
Figure 15: Thermoforming Products' Examples .....	8
Figure 16: the PEAP Environmental Approval Process .....	<b>Error! Bookmark not defined.</b>
Figure 17: Vicinity of the Factory .....	14
Figure 18: Company Owned Lands and Factory Site Layout.....	14

### List of Maps

Map 1: Project Location (Based on MoLG Data) .....	15
Map 2: Land Cover (based on Molg data) .....	16
Map 3: Master Plans (based on Molg data) .....	17
Map 4: Agricultural Value (based on Molg Data).....	17
Map 5: Natural Reserves & Biodiversity Areas (based on Molg data) .....	18
Map 6: Topography (based on Molg data) .....	19
Map 7: Geology (based on Molg data) .....	20
Map 8: Soil Type (based on Molg data) .....	21
Map 9: Water Sources & Vulnerability (based on Molg data) .....	22
Map 10: Landfills (based on Molg data).....	24
Map 11: Cultural Heritage (based on Molg data) .....	26

### Abbreviations and Acronyms

Acronym	Meaning
ARIJ	Applied Research Institute - Jerusalem
B.P	Bank Policy
BP	Bank Procedure
CAE	Child Abuse / Exploitation
CAPEX	Capital Expenditure
dB	Decibel
EA	Environmental Assessment
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ERP	Emergency Response Procedures
ESHG	Environment, Safety, and Health Guidelines
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
EQA	Environment Quality Authority
FCV	Fragile Conflict Violent
F4J	Finance For Jobs
FSCC	Food Safety System Certification
GDP	Gross Domestic Product
GF	Ground Floor
GIIP	Good International Industry Practice
GM	Grievance Mechanism
HDPE	High-density Polyethylene
HVAC	Heating Ventilation and Air Conditioning
ICF	Investment Co-Financing Facility
IFC	International Finance Corporation
IFI	International Financial Institution
IPF	Investment Policy Financing
ISBM	Injection Stretch Blow Molding
ISO	International Organization for Standards
JSC	Joint Services Council
KWp	Kilowatt Peak

<b>Acronym</b>	<b>Meaning</b>
MoF	Ministry of Finance
MoH	Ministry of Health
MoLG	Ministry of Local Governance
MoNE	Ministry of National Economy
NIOSH	National Institute for Occupational Safety and Health
NIS	New Israeli Shekel
O.P	Operational Policy
OHS	Occupational Health and Safety
O&M	Operation & Maintenance
OP	Operational Policy
OSHA	Occupational Safety and Health Administration
PA	Palestinian Authority
PAP	Project Affected Parties
PCBS	Palestinian Central Bureau of Statistics
PEAP	Palestinian Environmental Assessment Policy
PEL	Palestinian Environmental Law
PIA	Project Implementing Agency
PLL	Palestinian Labor Law
PPE	Personal Protective Equipment
PSI	Palestinian Standards Institute
SDS	Safety Datasheet
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
TOR	Terms of Reference
USD	United States Dollar
US	United States
VOCs	Volatile Organic Compounds
WB	World Bank
WBG	World Bank Group
WHO	World Health Organization
WWTP	Wastewater Treatment Plant
WPI	Al-Wafa Plastic Industries

## Executive Summary

### 0.1. Introduction

The proposed expansion of Al-Wafa Plastic Industries (WPI) in Hebron, Palestine, aims to meet the growing demand for innovative plastic packaging and containers within the Palestinian market. Specializing in the production of various plastic items for the food, beverage, and chemical sectors, WPI is planning to integrate advanced thermoforming technology to enhance production capacity and reduce costs. Hence, the company is planning an expansion project, estimated at 5.85 million USD, with partial financing proposed through a grant from the Finance for Jobs II Project (F4JII). The F4JII is implemented by DAI and funded by the World Bank. This project aligns with the F4JII's objective of stimulating private investment and employment in the West Bank and Gaza, particularly in the light manufacturing sector. The project is to be supported through the F4J II's Component 2: the Investment Co-financing Facility (ICF). Further details regarding the F4JII project's objectives is available in the [Environmental and Social Management Framework \(ESMF\)](#).

As the F4JII is funded by the World Bank, the WBG's Operational Policies (O.Ps), apply to this investment project. Hence, an Environmental and Social (E&S) Audit has been conducted for the existing factory facilities of WPI and an E&S screening has been conducted for the proposed expansion project where the screening determined that out of the 10 O.Ps, only O.P 4.01 is applicable to the project. The E&S audit resulted in a Corrective Action Plan (CAP) which has been integrated into the ESMP's Matrix through specific mitigation measures detailed in chapter 6. Moreover, the screening concluded that the proposed project of category B in line with O.P 4.01, and an ESMP is to be prepared for the project. Further details on the E&S risk classification and ESMP justification are available in section 1.2.

WPI's E&S Audit and the expansion project's E&S Screening can be accessed through the following link:

- [E&S Audit](#)
- [E&S Screening](#)

### 0.2. ESMP Scope and Objectives

This ESMP is designed to identify potential impacts, develop specific mitigation measures with cost implications, assign implementation responsibilities, and integrate environmental and social considerations into the project's activities. It ensures risks and their mitigations are factored into design criteria and provides a monitoring methodology with success indicators for effectiveness. The ESMP complies with national laws and legislations, international standards and GIIPs including the World Bank Group's O.Ps which include the IFC's PSs, General and industry specific EHS Guidelines. For further information on applicable laws, legislations, policies, and guidelines, please refer to chapter 3 of the ESMP.

### 0.3. Project Description

#### 0.3.1. Existing Operations

WPI's products encompass a range of innovative industries, including the manufacturing of plastic containers and caps that are supplied to food, food oil, and olive oil factories. Additionally, they produce jerry cans for mineral oil and detergents. Currently, the company estimates that it employs 247 individuals and operates 40 production lines. Al-Wafa Plastic Industries operates a factory with a 3,000 m<sup>2</sup> footprint and a total floor area of 10,000 m<sup>2</sup>. The company's diverse product portfolio of approximately 400 items is produced using blowing and injection techniques. WPI products are primarily made from high-density polyethylene (HDPE) and polypropylene (PP), with capacities and weights varying to meet different market needs. In addition to these, Al-Wafa

manufactures an array of caps, covers, handles, and other accessories, offering customization and labeling options to cater to client-specific requirements.

Additionally, in terms of raw material, the company relies on plastic resins and granules, which are PET, HDPE, and PP that are determined safe for food grade containers in accordance with Food Safety Management systems (FSCC), and the national mandatory standards stipulated in chapter 3. The company's current processes comprise of utilizing 3 main plastic production technologies; (i) Blowing, (ii) Injection Stretch Blow Molding (ISBM), and (iii) Injection-Compression Molding. Further details of the technologies and their description are available in Chapter 2. Additionally, the company's production process begins with the storage of raw material, the plastic granules, in the storage warehouse, from there these bags of granules are transported into the factory and are fed into the machines based on the required product, its plastic type, and the used production technology. Movement of raw material and final products are done by electric forklifts owned by the company. For the import of raw material and export of final product, the company owns its fleet of vehicles.

Al-Wafa has not conducted formal Environmental Assessments (EA) or Environmental Impact Assessments (EIA) as per their records. Where the national requirement for an Initial Environmental Evaluation (IEE), or an EIA is determined once the company submits a request for licensing at the Ministry of National Economy (MoNE) for an industrial facility, who in turn circulate the request to other ministries that they determine relevant to the project, including EQA in many cases. As the license has been issued without an Environmental Approval or a requirement for an IEE / EIA, EQA's approval was not requested by MoNE.

However, the company underscores its commitment to environmental and health standards by obtaining certifications such as ISO 9001, FSSC 22000, ISO 22000, Israeli Standard 5113, and the ISO 14001 for environmental management, which was acquired in March 2023 and is due for an audit in 2026 to ensure continued compliance.

### 0.3.2. Expansion Project

Al-Wafa Plastic Industries is embarking on an expansion project in Hebron that promises to create up to 80 direct jobs, focusing on employing women and youth. The expansion covers finishing works of a new industrial building and machinery, including a thermoforming machine, printing machinery, molds, conveyers, a robot stacker, an air-conditioned electrical cabinet, a recycling crusher, and an oil-free air compressor.. The new building will be used for storage, where storage stock will be moved to it from the existing factory, and the emptied space in the current factory will be utilized for the expansion project. The expansion project will entail 3 main phases; (i) a planning and procurement phase for developing engineering designs, relocating materials to the new building, securing financing, and procurement processes for the machinery and equipment, (ii) the installation phase will include completing the new building's finishing works, connecting the new production line and its accessories, training of project workers, and procurement of raw material, and (iii) the operational phase which includes producing and marketing both new and existing products and other operational activities such as maintaining licenses and general maintenance works.

Further details on the expansion project's outline, the thermoforming technology and production line, as well as the expansion project's phases are available in section 2.3.

## 0.4. Baseline Conditions

WPI's premises are situated in Abu De'jan area, northwest of Hebron city center, within "Area A" geopolitical designation. The factory is set apart from residential zones, on land owned by the Juneidi family, who also own the factory and reside approximately 120 meters to the east. The surrounding area is a mix of scattered residences, olive orchards, and vacant land, with the nearest community, Wad Aziz, beginning 350 meters west of the factory. Additionally, essential

facilities such as a primary school and the Al-Ahli hospital are located within 700 meters and 1.1 kilometers respectively, from the factory. In terms of transportation, the access road to the site is paved and in a good condition, there is no witnessed traffic due to the area being a suburban one. In terms of planning, Hebron in general lack an approved master plan and operates under a dated partial plan from 1944, where according to the Ministry of Local Government (MoLG) data, the site is not included within an urban masterplan. Additionally, the project site in accordance with MoLG data is of low agricultural value, with no nearby biodiversity or protected areas.

Additionally, in terms of utilities, water scarcity is a critical issue in Hebron district in general, where WPI obtains its water from the municipality which has only four licensed groundwater wells for domestic use. In terms of wastewater, the city is serviced by a combined sewer system which connects 70% of the residents, however WPI being in the suburban area of Abu De'jan is not connected by the sewage system and relies on an on-site septic tank. Furthermore, in terms of electricity the site is supplied by Hebron electric power co. (HEPCO) which services the city of Hebron and its villages and towns. Solid waste management for WPI is conducted by the municipality, where the site does not have any adjacent landfills.

In general, the site has been noted to be in quite area with no notable noise, nuisance, or air pollution sources. The site is distant from any cultural heritage sites and is 445 meters to the south of the closest one, Khirbet Abu Kharsa.

Further details on the baseline conditions of the project site are available in Chapter 4.

#### 0.5.Environmental and Social Risks and Mitigation Measures

The environmental and social risk assessment of the proposed expansion project examines the various stages needed to realize the project. And as such, these are divided in this regard to "Installation" and "operational" phases. While during all project phases positive impacts are expected especially in terms of employment creation, socio-economy, and meeting the local market needs of locally produced plastic containers and packaging solutions, there are also expected associated negative impacts during both phases.

The following tables summarize the ESMP matrix which denote all E&S risks, mitigation measures, responsibilities of implementation, monitoring activities, monitoring responsibilities, success indicators, and relevant budget. Further details are available in Chapters 6: Potential E&S impacts and proposed mitigation measures, and Chapter 7: E&S Management Matrix.

- In the Planning and procurement phase, the company is required to enhance its organizational structure in terms of capacity to implement the CAP of the E&S audit, and manage the implementation of the ESMP. Additionally, this phase shall include obtaining required licenses and permits from MoNE, EQA, and MoH based on an expansion permit request to be submitted at MoNE by the company.

In the installation phase, the ESMP addresses several key areas;

- Air Quality/Emissions & Dust: Risks include dust from finishing works and solvent use. Mitigation measures involve dust control during finishing works, using low-VOC materials, and ensuring fume management with local exhaust ventilation systems during equipment setup.
- Nuisance (Noise/Vibration): Drilling, cutting, finishing works, and construction traffic contribute to noise. Mitigating this includes scheduling noisy activities during daytime, managing noise levels to meet Minister of Labor Decision No.4 of 2005 on Noise Levels in the Workplace, maintaining machinery and vehicles, and selecting low-noise equipment.
- Traffic and Vehicular Movements: Construction vehicle movements pose accident risks. Measures include vehicle maintenance, safe driving practices, movement schedules to

avoid rush hours, covering and securing loads, using reversing alarms, and establishing safe loading/unloading protocols.

- Visual Impacts: Poor craftsmanship and waste accumulation affect visual value. Continuous housekeeping, removing unused equipment, and proper waste storage are key mitigation strategies.
- Solid Waste: Mixing installation waste with municipal waste and improper disposal are concerns. Contractors must segregate waste, adhere to waste management plans, and dispose of waste in designated landfills.
- Labor Rights: Risks involve non-compliance with labor rights and child labor. Mitigation includes contractual obligations to adhere to labor laws, verifying employment conditions, a Workers' Grievance Mechanism, and mandatory injury insurance policies for workers.
- Working Conditions and Occupational Health and Safety: Non-compliance to PPEs and lack of capacity and awareness are risks. Compliance inspections, housekeeping, skilled workers for specific tasks, capacity building, and an Occupational Health and Safety Plan are some of the main mitigation measures.
- Community Health: Public engagement issues, nuisance, and waste pose risks. Stakeholder engagement, grievance mechanisms, and employing other ESMP mitigation measures address these concerns.
- Gender-Based Violence: Risks of GBV, SEA, and SH to female workers are mitigated through a GBV grievance referral mechanism, a code of conduct, adherence to labor employment measures, and GBV prevention capacity building.

In the Operations phase, the ESMP addresses several key areas;

- Air Quality/Emissions, Fumes & Dust: Current operations and expansion processes may lead to fume and dust emissions. Mitigation includes air quality measurements to ensure compliance with occupational health and safety standards, personal protective equipment (PPE) for workers, strict temperature controls during production, comprehensive operator training, regular machinery maintenance, and efficient management of diesel generators and HVAC systems. Advanced dust collection systems and regular monitoring for VOCs and fumes will be employed, with appropriate solutions based on quality tests.
- Nuisance (Noise/Vibration): The main concerns are high noise levels from operations and vehicular noise. Mitigation measures involve noise level management through maintenance and noise-dampening materials, acoustic insulation, PPE for workers, noise monitoring, adherence to national noise regulations, and optimized machinery use. Vehicle movements are to be limited to daylight hours, avoiding noise-sensitive areas.
- Traffic and Vehicular Movements: Mitigation for risks associated with the import of raw materials and potential accidents includes vehicle maintenance, safe driving practices, scheduling to avoid peak hours, securing loads, and establishing protocols for safe loading and unloading.
- Visual Impacts: Maintaining the aesthetic value of the area involves continuous housekeeping, proper storage of materials, and landscaping of existing green areas.
- Solid Waste: To tackle production and packaging waste, the ESMP proposes production waste reduction through lean manufacturing, quality checks, recycling initiatives, and strict waste segregation practices. Housekeeping includes daily collection and disposal of waste.
- Hazardous Material and Waste: Proper storage, labeling, and safe disposal practices for oils, lubricants, and maintenance waste are emphasized, along with occupational health and safety measures for workers handling these materials.
- Labor Rights: Clear employment contracts, a Code of Conduct outlining labor rights, E&S training, adherence to minimum wage laws, mandatory insurance, and a transparent recruitment process are all required to protect labor rights.

- Working Conditions and Occupational Health and Safety (OHS): Regular E&S audits, OHS capacity building, thorough risk assessments, and effective control measures, including PPE compliance and workplace safety protocols, are key. An OHS Plan is to be implemented, and skilled workers are to be employed for specialized tasks.
- Fire Hazard and Risks: Monitoring and control measures to prevent overheating, installation of fire safety equipment, and strict housekeeping to minimize dust accumulation are planned to mitigate fire risks.
- Community Health and Safety: Visitor safety protocols, signage, and restricted areas are to be established, along with a grievance mechanism for the public.
- Gender-Based Violence (GBV): Employment and administrative management policies are to be merit-based, a Code of Conduct for GBV prevention is to be implemented, and capacity building and training on GBV topics are to be provided. A grievance mechanism with a focus on GBV issues will also be established.

#### 0.6. Stakeholder Engagement

Due to the recent unfortunate events that took place in the country and the closure and travel restrictions, the scheduled public consultation and engagement activities were halted. As such, bi-lateral phone consultations were carried with the project's stakeholders as identified in chapter 9. Bi-lateral engagements were conducted with EQA, MoH, Hebron Municipality and Hebron Polytechnic University. Feedback received included ensuring compliance to national requirements by coordinating with MoNE and EQA, ensuring safe ergonomic conditions in the facility particularly in relation to noise and air emissions, and ensuring liaising with the municipality for waste and wastewater management. Further details of the engagement and the received feedback are available in chapter 9.

#### 0.7. Institutional Arrangements

WPI is responsible for overseeing the entire project lifecycle, from installation to operation, ensuring compliance with environmental and social measures. They have identified capacity needs and assigned an E&S focal point and are expected to hire an OHS supervisor. The PIA has monitoring capacities of the project through quarterly E&S monitoring visits and reports. Contractors and suppliers, while having a limited role in finishing works and equipment installation, are expected to designate an E&S focal point to handle E&S matters and report to WPI.

#### 0.8. Monitoring and Reporting

Monitoring is critical to ensure compliance to the mitigation measures detailed in the ESMP and to identify any impacts that were not spotted during the preparation of the ESMP. The monitoring reports for the project will provide a reference over the implementation of the ESMP and will consist of:

- Al-Wafa Plastic Industries:
  - The E&S Focal Point & OHS Supervisor will conduct continuous monitoring of E&S and OHS aspects during installation and operations, generating reports as required.
  - Quarterly reports on ESMP compliance will be prepared by WPI.
- PIA:
  - The F4J ESO / E&S Consultant will conduct monthly or quarterly site visits to ensure ESMP compliance.
  - Quarterly monitoring reports will be prepared by the PIA, including photos to support visual assessment of ESMP implementation.

Additionally, the ESMP outlines the emergency, incident and accident reporting requirements between WPI and the PIA, as well as for the PIA and the World Bank. Further details are available in chapter 8.

### 0.9. Grievance Mechanism

The Grievance mechanism is part of the ESMP, its purpose is to facilitate the communication between the stakeholders and the project management, and to resolve issues affecting the stakeholders promptly and effectively. Moreover, the grievance mechanism helps the project team to identify environmental and social issues resulting from the operation of the project and take actions to resolve such issues accordingly. The grievance mechanism shall be announced along with the project description through relevant means of media, whether through newspapers, social media, or radio announcements. Complaints received through the grievance forms and mechanisms shall be screened to the ESMP Matrix in order to define whether the issue is an anticipated issue or is a new issue that needs to be included in the new revision of the ESMP. The GM will be included in the training provided to workers. More details are available in the GM in Annex II of this ESMP.

### 0.9. Budgetary Requirements

The majority of the mitigation measures outlined don't necessitate additional expenditures. However, to ensure the effective implementation of the project and to mitigate potential negative impacts, certain activities will incur costs.

In the planning phase, consultation activities, and capacity building and trainings carry anticipated expenses. Where the total cost in this phase are estimated at around 17,900\$ - 27500\$, which include the salary of the OHS supervisor the company is expected to hire in line with Law No.3 of 2019.

In the installation phase, additional expenses are related to the procurement and installation of HVAC and fume extraction systems, monitoring of noise levels, PPEs, emissions capturing system for the granulator, and sound installation. This takes into consideration the capacity building budget needed during this phase. Amounting to 100,500\$ - 197,600\$, with the wide range pertaining to lack of knowledge on hardware needs (i.e., HVAC, Emissions capturing system, fume extraction, sound insulation) which have to be priced based on engineering solutions, technology choice, and the needs of the company.

During the operational phase, costs will be associated with capacity building, air quality tests, and PPEs. The first year of operations is estimated to cost between \$34,400 and \$45,500, with subsequent years ranging from \$17,900 to \$29,000 annually.

## 1. Introduction

### 1.1. Background

The demand for plastic products in the Palestinian market is continuously growing<sup>1</sup>. The Palestinian plastics manufacturing sector primarily consists of small companies with an average revenue of \$1 million and fewer than 12 employees per firm<sup>2</sup>. The Plastic Industries Union (PPIU), established in 1996, currently comprises 105 companies in the West Bank alone, each specializing in various products. This has contributed to increasing Palestinian self-sufficiency in plastic products, reducing the need for imports<sup>3</sup>. One of the PPIU members is Al-Wafa Plastic Industries, founded in Hebron, Palestine.

Al-Wafa Plastic industries (WPI), is a woman-led and owned business that is a leading provider of plastic packaging solutions for various types of products and is located in Hebron, Palestine. WPI specializes in the production of various plastic containers and caps that are supplied to food, beverage, and cooking oil manufacturers. In addition to bottles and containers used for mineral oil and detergents. Thus, as a provider of packaging and container solutions, WPI is considered a key partner within the local food processing and chemical manufacturing sectors and their supply chains.

In response to a thorough assessment of the market's demand for cutting-edge plastic packaging and containers, Al-Wafa is taking strategic steps to maintain its competitive advantage and address market requirements by expanding its production capabilities. This expansion involves the integration of an advanced plastics manufacturing technique, specifically thermoforming. Thermoforming has gained widespread popularity due to its substantial global market value, which currently stands at approximately \$14 billion and is projected to exceed \$20 billion by the end of this decade<sup>4</sup>. The adoption of this innovative process in the Palestinian market has the potential to benefit both domestic and foreign markets, facilitating job creation and strengthening value chain relationships.

To finance this expansion, which is estimated to cost approximately 6.22 million USD (5.85 million USD for machinery and equipment) in capital expenditure (CAPEX), the company has applied for a grant from the Finance for Jobs II (F4JII) Project. The F4J II project is implemented by DAI on behalf of the Ministry of Finance (MoF) and is funded by the World Bank. Its primary objective is to mobilize private investments and create employment opportunities in the West Bank and Gaza. The proposed expansion project falls under Component 2 of the F4JII; the "Investment Co-Financing Facility (ICF)," which provides risk-sharing grant support for economically viable job-creating private sector investments that might otherwise face challenges due to market, institutional failures, or Fragile Conflict Violent (FCV) risk considerations.

Based on the due diligence conducted by the F4JII's PIA, the project meets the F4JII objectives of job creation, and is within the light manufacturing sector which is one of the priority sectors of the F4J II project. Further details regarding the F4JII project, its other components, and objectives are available in the [Environmental and Social Management Framework \(ESMF\)](#).

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<sup>1</sup> <https://www.maannews.net/articles/2022752.html>

<sup>2</sup> [PCBS Economic Survey Series](#)

<sup>3</sup> <https://ppiu.ps/about-us-2/>

<sup>4</sup> [www.grandviewresearch.com/industry-analysis/thermoformed-plastics-market](http://www.grandviewresearch.com/industry-analysis/thermoformed-plastics-market)

## 1.2. Justification for the Environmental and Social Management Plan

On August 4th, 2016, the World Bank's Board approved the adoption of the "Environmental and Social Framework (ESF)" to replace the previous Operational Policies – O.Ps (which are currently implemented by the F4J II Project). The ESF makes important advances in areas such as labor, non-discrimination, climate change mitigation and adaptation, biodiversity, community health and safety, and stakeholder engagement – including expanding the role of public participation and grievance mechanisms. Where the ESF became effective on October 1st, 2018, and is being applied to all Investment Policy Financing (IPF) Projects initiated after this date. As the F4J II project has been approved on July 27th, 2017, it still applies the Operational Policies (O.Ps) of the World Bank.

WPI has applied for a grant from the F4JII project, and as the F4J II is supported and funded by the World Bank, the WBG's Operational Policies (O.Ps), otherwise known as environmental and social safeguard policies, apply to this investment project. Based on the Environmental and Social (E&S) Audit conducted for the existing factory facilities of WPI and the E&S screening conducted for the proposed expansion project, and in accordance with the F4J II' ESMF, the screening concluded that the proposed project of category B in line with O.P 4.01, and an ESMP is to be prepared for the project. This is due to that the project has been classified as having "Potential Impacts on the Environmental and Social Conditions that are moderate (not significant) and can be managed through the implementation of specific environmental and social measures. The ESMP is chosen as a more streamlined approach compared to a comprehensive ESIA. WPI's E&S Audit and the expansion project's E&S Screening can be accessed through the following link:

- [E&S Audit](#)
- [E&S Screening](#)

## 1.3. ESMP Scope and Objective

This ESMP is an implementation guiding tool aiming to determine the potential risks and anticipated environmental and social impacts that could arise from the expansion and operation of the new expansion project. And accordingly, the ESMP shall provide adequate mitigation measures corresponding to the nature, scale, and magnitude of these risks. This will translate in terms of avoidance measures, and where not possible minimizing and mitigating their impacts. Hence, decreasing the anticipated and predicted negative impacts on the physical and social environments of the project during its construction and operation.

Specifically, this ESMP is designed to ensure the following:

- Potential impacts during the implementation of project activities are identified;
- Clarify how the ESMP relates to the Conducted E&S Audit and its CAP; and how the corrective actions are accounted for in the provided mitigation measures.
- Detailed and specific mitigation measures are developed with relevant cost implications;
- Clear demarcation of responsibilities for the implementation of the mitigation measures;
- Environmental and social considerations are fully integrated into the various activities of the proposed project;
- The identified environmental and social risks, and their corresponding mitigation measures are considered into the detailed design criteria;
- Provide a monitoring frequency and methodology for the mitigation measures so that they are periodically assessed and tracked, with success indicators to ensure their effectiveness.

This ESMP has been prepared and reviewed to ensure compliance with national laws and legislations, international standards and GIIPs, including the World Bank Group's O.Ps which

include the IFC's PSs, General and industry specific EHS Guidelines. Where there is a difference between the national legislations and the WBG's O.Ps, the ESMP follows whichever is more stringent. Moreover, the project has been screened and a screening report has been issued for its potential environmental and social impacts, determining that out of the 10 policies, O.P 4.01 is applicable to the project.

In agreement with the Term of Reference (ToR) for this assignment, the Consultant has prepared a full ESMP for Al-Wafa Plastic Industries' expansion project. The process of implementing this ESMP is a dynamic one, where this document and its suite of management plans will be updated throughout implementation and when necessary to ensure that the most recent findings are incorporated and that they are identified with their corresponding mitigation measures.

#### 1.4. Beneficiary Overview: Al-Wafa Plastic Industries

Al Wafa for Plastics Industries is a privately-owned company founded by Wafa Al Juneidi and Mamoun Al Juneidi in 2004 in Hebron, Palestine. Their goal was to improve the competitiveness of the food manufacturing industry by addressing the packaging needs of local producers. This vision led to the establishment of Al Wafa Plastics Industries (WPI). The company is officially registered with the Palestinian Ministry of National Economy (MoNE) as a private shareholding firm, and it holds the registration number 562462135. This registration is in accordance with the Palestinian Companies law No. 42 of 2021, which governs the legal framework for companies operating in Palestine.

At the beginning, WPI operated a limited number of production lines within an 800-square-meter area. In 2016, the company underwent significant expansion, increasing its production area to around 10,000 square meters and adding approximately 25 new production lines. The company's products included a wide variety of plastic packaging and containers, catering to a significant portion of large food and beverage manufacturing companies.

WPI has then expanded its production capabilities to encompass a range of innovative industries, including the manufacturing of plastic containers and caps that are supplied to food and cooking oil factories. Additionally, they started producing jerry cans for mineral oil and detergents. In 2016, as a result of their growth, WPI increased its production capacity to 350 tons per month. Subsequently, their products have been marketed both domestically and internationally. This expansion led to the employment of one hundred male and fifty female skilled workers at the time, with women making up more than 70% of the workforce. Currently, the company estimates that it employs 247 individuals.

Ever since its establishment, WPI has been committed to a development plan aimed at enhancing the quality of its products to align with international export standards. The company consistently monitors and assesses its production outcomes to fulfil the specific requirements of its customers. This dedication has led to the attainment of international quality certifications, such as the ISO 9001-2015 "International Quality Management Certificate" in 2018 and the ISO 22000 (FSSC) "certificate in Food Safety Management" in 2020.

Presently, Al-Wafa operates 40 production lines, catering to the needs of companies in both the Palestinian and Israeli markets for plastic-based packaging. The company offers a wide range of products, including plastic containers, lids, and bottles for food packaging, mineral oil, as well as containers and packaging for cleaning products, particularly lids and packaging for detergents and other household cleaning items produced both domestically and in Israel. Al-Wafa also offers customization options for firms seeking to personalize their product packaging.

## 2. Project Description

### 2.1. Existing Production Facilities

#### 2.1.1. Overview

Al-Wafa Plastic Industries' production facilities cover an area of around 3,000 m<sup>2</sup>, with a total floor space of 10,000 m<sup>2</sup>, housing the main factory, storage, and parking areas as seen in figure 1 below. The main building consists of seven floors, including production areas, administration, guesthouse, restaurant, and storage spaces. A new 320 m<sup>2</sup> building has been added for storage to facilitate the factory's expansion, to be used for moving the storage area to it and utilizing the freed-up space in the existing factory to house the thermoforming production line.



Figure 1: Map of Al-Wafa Factory and Premises

The factory produces around 400 diverse products using mainly (i) blowing and (ii) injection techniques. Products range from various containers and jerry cans for mineral oils, foods, and chemicals, to accessories like caps and handles, customizable to client specifications.

The blowing lines are based on two main technologies; (i) High Density Polyethylene Blowing (HDPE), and (ii) Injection Stretch Blow Molding (ISBM). The blowing lines create heat and chemical-resistant items from HDPE, in different shapes, colors, and sizes. The process begins with melting HDPE granules, forming a parison, which is then blown into shape within a mold. The ISBM technique produces transparent items, stretching and blowing a preformed PET resin into final shapes.

Injection-compression molding at the factory allows for the creation of intricate designs with improved dimensional stability, beneficial for items that integrate inserts or require precise optical properties. Additionally, the company's manufacturing processes include shredding and recycling of defective parts, turning them into reusable granules, as well as labelling through in-Mold-Labeling Techniques.

Key raw materials include - Crystalline Polyethylene Terephthalate (PET), HDPE for durable containers; and Polypropylene (PP) for transparent food packaging. These materials are selected for their non-hazardous nature and suitability for recycling.

For Further details regarding the existing project's facilities and operations, please refer to the following technical overview adapted from the E&S Audit Report: [WPI Existing Facilities and Operations](#).



Figure 2: Al-Wafa Plastic Industries Existing Facilities (top left: Existing Factory, top right: Storage area, Bottom: Existing production lines)

### 2.1.2. Resource Usage and Waste Production

Through discussions with the owners, relevant operational resources and utilities have been reviewed. The process as described requires substantial amounts of electricity, where in 2022 the company's electricity consumption amounted to 7,013,243 KWh. While the company installed a rooftop solar energy system (600 KWp on-grid) covering the main building and storage warehouses, it aims to further decrease its energy consumption through efficiency measures and installing solar system on the new building (part of the expansion project, stored products will be moved to it and the current storage area in the existing factory will be used for the expansion project), additionally the company has two stand-by diesel generators situated outside adjacent to the parking area directly to the south of the storage area identified in figure 1. The company stated that while these two generators exist, they have not yet been switched on or operated. The reason behind that is that one of the generators is connected to the offices, and the other is connected to supply some of the machinery, as they cannot handle the required load for the entire factory, as well as electricity interruptions do not last long if they happen. In terms of air filters, both have filters installed, while in terms of noise muffler only one is equipped. The company stated that they do periodic inspections of their conditions but it is not scheduled. While the new thermoforming production line will increase the electricity consumption, it is not expected to cause a significant increase impacting the utility grid, yet this has been checked with the utility provider and is further discussed in chapter 9 below.

In terms of water usage, it is not part of the process and is used for drinking, cleaning, gardening, and housekeeping among other non-industrial uses, where water consumption amounted to 1930 m<sup>3</sup> in 2022. Water is only used in closed chiller system without the need for replacement.

In terms waste production, wastewater has been negligible and has not been reported in company data. The area does not have a public sewer system and the factory premises have their own septic tank. In terms of solid waste, the production processes do not result in process waste as defected products are shredded and reintroduced to the process. However, defected wrapping nylon and some product types that cannot be recycled are disposed. According to the company, defective products are given away at no-cost to farmers and livestock breeders.

## 2.2. Previous Environmental Assessments

According to the discussion carried out with the company's management, they do not have records of any form of EA or EIA being conducted during the licensing of the factory. In terms of the environmental approval from EQA, this is typically requested when licensing the factory, where MoNE requests the approval from EQA. According to the factory owners, the MoNE license has been issued without requiring EQA's environmental approval. Through a bi-lateral engagement conducted with EQA on December 31<sup>st</sup> 2023, EQA office in Hebron is to check their records for WPI environmental approval, where in turn WPI shall liaise with EQA for the new expansion project.

Nevertheless, the company has acquired different quality certificates to ensure their commitment to health, food safety, and the environment. Company certificates include;

- ISO 9001: Quality Management
- Food Safety System Certification (FSSC 22000)
- ISO 22000 on Food Safety Management
- Israeli Standard 5113 Compliance Certificate "Plastic Material in Contact with Food and Beverage".
- ISO 14001 on Environmental Management system: The company obtained their ISO 14001 in March 2023 with an expiry date in 2026. The company will be conducting an ISO 14001 audit at that time to ensure its validity.

## 2.3. Expansion Project

### 2.3.1. Overview

The proposed enhancement and extension of the production facilities in Hebron for Al-Wafa Plastic Industries will allow the firm to create up to 80 direct jobs particularly for women and youth. The firm seeks to enhance its ability to offer high value plastic products such as containers and lids through adopting thermoforming. The new process will reduce production times and costs, by some estimates of at least 15%<sup>5</sup>, and allow the firm to not only capitalize on its own growth, but rather providing movement and a possible shift in the demand stimulated by accessing segments in a more immersive manner, be they existing or new, through targeted marketing efforts that will reflect the nature of the market opportunities both domestically and internationally. This is assumed to require a total investment of \$6.2 Million.

The proposed expansion project includes;

*Table 1: Expansion Project Activities*

No.	CAPEX	Financing Responsibility
1	Industrial building (200*125 meters) -	WPI
2	DMK 73 – 40 S Thermoforming Machine	WPI & F4JII
3	High Speed of-set Printing Machine -	WPI
4	Six Sets of thermoforming Molds	WPI
5	Output belt conveyer	WPI
6	Roll Lifter 1.500 KG	WPI
7	Robot Stacker	WPI
8	Air-Conditioned Electrical Cabinet	WPI
9	Flash Material inline Crusher for recycling material	WPI
10	Oil Free Food Grade Air Compressor	WPI

### 2.3.2. Thermoforming

Thermoforming is a manufacturing process used to shape thermoplastic sheets into various products by applying heat, pressure, and vacuum. The thermoplastic sheet is typically 0.5 to 5 mm thick and can be colored or clear, depending on the application.

The process begins with a flat thermoplastic sheet that is loaded onto a transport system and conveyed into the heating area. The heating area typically consists of infrared heaters, convection heaters, or a combination of both. The sheet is heated to a temperature typically between 150 and 200 degrees Celsius, depending on the material being used, the thickness of the sheet, and the size of the part. Once the sheet reaches the required temperature, it is transferred to the forming station, where it is clamped into place over a mold. The mold can be made of various materials such as aluminum, epoxy, or composite materials. The mold may be cooled or heated to control the part's cooling rate and reduce cycle time.

<sup>5</sup> [www.tdipacksys.com/blog/4-benefits-thermoform-packaging-manufacturers/](http://www.tdipacksys.com/blog/4-benefits-thermoform-packaging-manufacturers/)

Next, a vacuum is applied to the backside of the sheet, drawing it onto the mold surface, and pressure is applied to ensure proper contact between the sheet and the mold. The pressure is typically 0.7 to 7 bar, depending on the size and complexity of the part. After forming, the sheet and mold assembly is cooled to a temperature below the thermoplastic’s glass transition temperature, and the vacuum is released. The formed part is then ejected from the mold, and any excess material is trimmed away using automated cutting equipment or by manual trimming.

Many companies commonly use PET and PETG plastics to create their thermoformed parts. Both have their advantages and are suitable for a variety of applications. Packaging companies often utilize PET plastic to create thinner thermoformed products, like water bottles. PETG has added glycol (Hence Polyethylene Terephthalate-Glycol) to create a stronger design, which makes it suitable for clamshell or blister packaging. Both plastic materials are U.S Food and Drugs Administration (FDA) friendly and acceptable for food packaging designs.

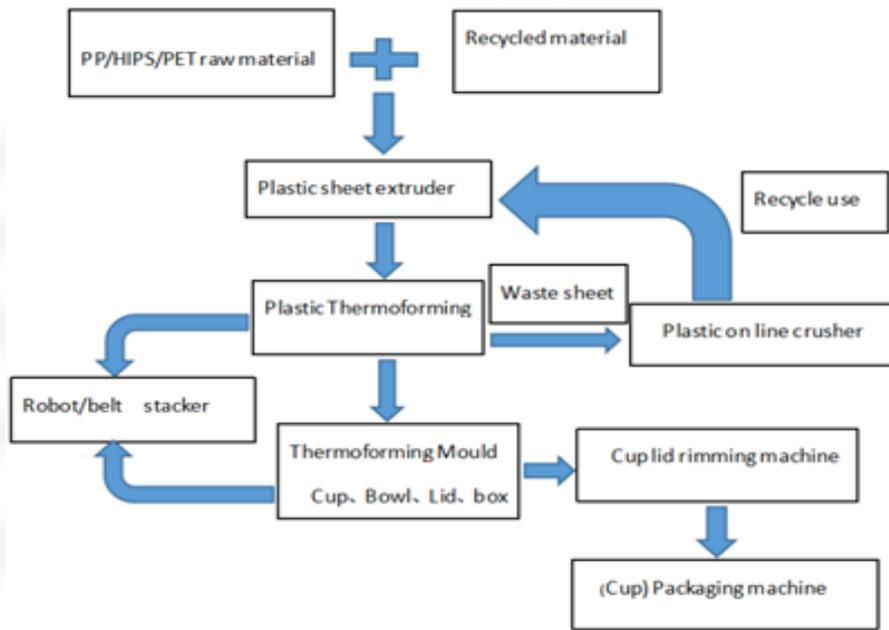


Figure 3: Thermoforming Process Description



Figure 4: Thermoforming Products' Examples

2.3.3. Expansion

Project Planned Activities

In order to realize the expansion of the factory, the company will undergo the following stages to reach successful operations;

**I- Planning and Procurement Phase:**

1. Development of engineering designs and production line layout based on the area to be used for this production line (i.e., the storage area in the existing factory which is to be emptied and moved to the new building)
2. Movement of stored material from the old building to the new one
3. Securing financing and ordering final quotation on machinery and equipment (table 2)
4. Implementation of the Corrective Action Plan (CAP) that has been prepared under the conducted E&S Audit for the existing facilities and operations.
5. Liaising with MoNE, EQA, and MoH for their requirements regarding the expansion project. This begins with the company coordinating with MoNE for an expansion license who in turn communicate with EQA, MoH and other ministries as relevant and as deemed by their internal procedures.
6. Preparation of environmental and social management plan (ESMP)
7. Purchase of molds

**II- Installation Phase:**

1. Finalizing finishing works of new building
2. Installation of the thermoforming production line with its electricity connections, chillers, and accessories in the main factory.
3. Installation of molds, output belt conveyer, roll lifter, robot stacker, electrical cabinet, and air compressor
4. Training and capacity building of project workers on the use of the new machines and equipment
5. E&S awareness and capacity building of project workers
6. Procurement of needed raw material for the new production line
7. Testing of new equipment, machinery, and molds

**III- Operations Phase**

1. Production of existing and new varieties, marketing and exporting
2. Integrate recycled inputs into manufacturing process
3. Maintain ISO and FSCC and other certificates by conducting needed audits
4. Maintenance and Repairs as needed

## 2.4. Project Cost and F4J II Proposed Support

With a relatively large investment requirement to realize the expansion project amounting to USD 6.22 million, WPI will allocate USD 5.45 Million towards Machinery & Equipment (including Machinery Installation, Shipping, Transportation & Testing Expenses), USD 600,000 towards construction works, USD 100,000 towards Vehicles, and USD 69,500 for initial working capital. As such, the F4JII Project through its ICF component is proposing a USD 400,000 grant to support the expansion project due to the existing market failure, and to help the company increase its investment rate of return. The F4JII-ICF grant will aim to co-finance the new production line via a "Thermoforming Machine".

## 2.5. Project Workers

Currently, a total of 247 direct employees work in the company, and of these, 175 are female employees. The substantial representation of female employees (which represent more than 70% of existing personnel) is a result of a policy introduced by Mrs. Wafaa Al-Juneidi, which prioritized the importance of providing job opportunities for females.

For all of the direct employment, the type of jobs are as follows:

- Production operations (162 jobs)
- maintenance operations (22 jobs)
- storage & warehouses (10 jobs)
- quality control and laboratory (8 jobs)
- logistics (8 jobs)
- general services (15 jobs)
- security (5 jobs)
- management and administration (17 jobs)

These can be further segmented between skilled and non-skilled jobs, whereby: skilled jobs that comprise 23% of employment are responsible for operating machinery and supervising production operations, quality control, laboratory, administrative affairs, and management; and the non-skilled jobs that 77% of employment are primarily responsible for production operations, packaging, and logistics.

In addition, 12 indirect jobs are estimated to have been generated by the company, and these stem from activities required around supply of raw materials.

In terms of the expansion project, it is expected to result in an economic opportunity for 80 additional individuals directly through Al-Wafa Plastic Industries. The new direct employment opportunities will include the following opening and the company stated that they aim to maintain at least 70% of their workforce being women if not more; 2 production managers; 5 sales officers; 1 marketing officer; 2 quality control officers; 1 administrative assistant; 1 accountant; 3 warehouse clerks; 4 maintenance technicians; 1 purchasing officer; 2 truck drivers; 2 forklift drivers; 10 operational technicians; 1 security person; 30 production line workers; 15 packaging workers.

### 3. Policies, Legal, and Regulatory Frameworks

Environmental legislation and regulations are vital tools to protect public health and the environment and give consideration to sustainable development. The project is guided by the World Bank safeguard policies, World Bank Environment, Health and Safety (EHS) Guidelines, both the general and industry-specific, along with the national laws and regulations.

#### 3.1. Palestinian National Laws and Legislations

The F4J II ESMF contains a gap analysis between the E&S relevant laws and legislations and the World Bank's Operational Procedures (O.Ps), particularly in relevance to the F4JII Project; The

gap analysis of the Palestinian Environmental legislations against the World Bank standards identifies several areas for improvement, particularly in the ESIA process, where clearer criteria for screening, inclusion of 'without project' scenarios, and a defined process for analyzing induced impacts are needed. To align with World Bank standards, adjustments will be made to exclude 'Type A' projects with significant impacts from financing and enhance the oversight of projects that do not require a full ESIA. Additionally, measures are needed to strengthen public participation and ensure accountability, such as mandating consultations and developing a Stakeholder Engagement Plan (SEP) and a Grievance Redress Mechanism (GRM), while incorporating World Bank EHS Guidelines and into the F4J II ESMF. Although the Palestinian Environmental Quality Authority (EQA) staff possess strong EIA skills, there is a need for greater familiarity with ESMFs and improved application of screening checklists and monitoring to fully integrate environmental and social management into project planning and execution.

In line with the aforementioned, the following national laws and legislations have been identified to be relevant to the project. For further details on the applicable national laws and legislations as well as relevance to the project, please refer to the F4J II Project's ESMF: [https://www.f4j.ps/cached\\_uploads/download/2021/01/17/environmental-and-social-management-framework-1610875245.pdf](https://www.f4j.ps/cached_uploads/download/2021/01/17/environmental-and-social-management-framework-1610875245.pdf)

- I. The Palestinian Environment Law (PEL)
- II. Palestinian Environmental Assessment Policy (PEAP)
- III. The Palestinian Public Health Law
- IV. The Palestinian Labor Law (PLL)
- V. Cabinet of Ministers and Ministerial Decisions on Occupational Health and Safety (OHS) as issued in the addendums of the PLL.
- VI. Decree on Minimum Wage No.4 of 2021
- VII. The resolution of the Palestinian Cabinet No. 8 of 2016 on the Regulation of Complaints
- VIII. Cabinet Decision No. 16 of 2013 regarding connecting residences and facilities to the public sewer network
- IX. The Palestinian Standards Institution (PSI) Outdoor Noise Standards (PS 840- 2005)
- X. The Palestinian Standards Institution Ambient Air Quality Standards (PS 801- 2010)

## 3.2. Palestinian Standards Institute Mandatory Specifications

### 3.2.1. General Overview of PSI Mandatory Specifications for Food Production

The Palestinian Standards Institute (PSI) issues mandatory technical specifications that are obligatory for relevant industries to follow, these include packaging and container manufacturing for foodstuff, as well as plastics in contact with foodstuff. The list of mandatory specifications contain over 140 technical specifications for various sectors that operators and industries have to comply with. These standards provide technical specifications, limits and thresholds for chemicals, microorganisms, and testing results. Additionally, it provides a designation of responsible authorities, inspections, and delineate the procedures needed for corrective actions when non-compliance is detected or when samples do not adhere to technical specifications.

For a comprehensive list of PSI's mandatory technical specifications : <http://www.psi.pna.ps/ar/TechnicalInstructions/Pages/MandatoryTechnicalInstructions.aspx#InplviewHashe447914c-a890-41d7-ba00-f8f65ae6feda=FolderCTID%3D0x012001>

### 3.2.2. PSI Mandatory Specifications on Plastic Material and Substances Intended to Come in Contact with Foodstuff

PSI's mandatory specifications No. (109-2023) has been approved in September 2023, to replace its predecessor (41-2013). The specifications provide a list of the chemical substances and

materials that are allowed to use in the manufacturing process, including monomers, additives, polymers and catalysts. The specifications provide the general and specific conditions and requirements for raw material and chemicals that are used in the manufacturing process, including the Specific Migration Limit (SML), which is the maximum permitted quantity of a specific substance that can migrate from a food packaging or container to foodstuff.

The specifications provide guidelines in its annexes for permitted chemicals and plastic raw material to be in contact with foodstuff and the manufacturing process.

The mandatory specifications can be found through the following link : <http://www.psi.pna.ps/ar/TechnicalInstructions/MandatoryPalestinianTechnicalInstructions/المواد%20والأدوات%20البلاستيكية%20المعدّة%20لملامسة%20الغذاء.pdf>

### 3.2.3. PSI Mandatory Specifications on Material and Equipment in Contact with Foodstuff

PSI's mandatory specification No. (104-2022) relates to any equipment or material that is prepared to be in contact with food stuff and is the basis for specifications No. (109-2023). The specifications require manufacturers to employ Good Manufacturing Practices (GMP) in the manufacturing process. The specifications state the general and specific requirements for the manufacturing of the goods and equipment and provides the general outline of the preparation for industry specific standards (e.g., plastic under 109-2023) among others.

The mandatory specifications can be found through the following link : <http://www.psi.pna.ps/ar/TechnicalInstructions/MandatoryPalestinianTechnicalInstructions/المواد%20والأدوات%20المعدّة%20لملامسة%20الغذاء.pdf>

## 3.3. World Bank Operational Policies and Bank Procedures

The WB has ten environmental and social operational policies referred to as the Bank's "Safeguard Policies" that should be considered in its financed projects. As WPI is to obtain a grant from the F4J II project, which is implemented by the DAI and financed by the World Bank, the O.Ps are relevant to this project. Further details on the World Bank's Operational Policies and E&S Categorization and the different E&S categories (A,B, C, and FI), are available in the F4J II's ESMP: [https://www.f4j.ps/cached\\_uploads/download/2021/01/17/environmental-and-social-management-framework-1610875245.pdf](https://www.f4j.ps/cached_uploads/download/2021/01/17/environmental-and-social-management-framework-1610875245.pdf)

Under the World Bank's operational policies, there are ten environmental and social policies referred to as the Bank's "safeguard policies". The Bank's environmental assessment policy and procedures in light of these ten safeguard policies are well described in the Operational Policy/Bank Procedures (OP/BP).

Based on the screening of the applicable Policies, only O.P 4.01 is relevant to the project.

### 3.3.1. World Bank OP/BP 4.01 on Environmental Assessment

The screening of applicable World Bank social and environmental safeguards policies indicated that, among these policies, only OP/BP 4.01 on Environmental Assessment is triggered by this project. The overall objective of the OP/BP 4.01 is to help ensure the environmental and social soundness and sustainability of investment projects. As per this policy, environmental assessment is required by the World Bank for projects proposed for WB financing to help ensure that they are environmentally sound and sustainable, and thus to improve decision making.

According to this policy, the WB undertakes environmental screening of each proposed project to determine the appropriate extent and type of EA. The WB classifies the proposed project into one of four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts. Based on the screening of this project, the project is classified as category B given that the potential adverse impacts are neither unprecedented nor are they as critical as those of Category A. I.e. the potential negative

impacts on human populations and environment are site specific; and the mitigation measures are easily designed and implemented. For such projects, the policy requires an ESMP to be prepared.

### 3.4. Environment, Health, and Safety Guidelines

#### 3.4.1. General EHS Guidelines

The World Bank Group Environment, Health, and Safety (EHS) guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). They define acceptable pollution prevention and abatement measures and emission levels in World Bank financed projects.

The project will apply the General Guidelines including (i) Environmental, (ii) Occupational Health and Safety, (iii) Community Health and Safety, and (iv) Construction and Decommissioning.

The EHS General Guidelines can be accessed through: <https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>

The project will pay close attention to section 3.3 of the World Bank Group EHS Guidelines related to Life and Fire Safety (L&FS). This is related to compliance with local laws and insurance requirements of the building codes, and fire department regulations and to designing the buildings and including Life and Fire Safety mitigation measures in accordance with GIIPs throughout the projects' lifecycle.

#### 3.4.2. Industry-Specific EHS Guidelines

the World Bank Group has specialized guidelines for industries which include guidance on potential risks and their appropriate mitigation measures. The World Bank Group, through their set of EHS Guidelines, have specific guidelines for "**Metal, Plastic, and Rubber Products Manufacturing**". These EHS Guidelines apply to WPI in its plastic industries section and they address material processing operations and includes industry specific impacts and management. The Metal, Plastic, and Rubber Products Manufacturing EHS Guidelines can be accessed through the following link:

<https://www.ifc.org/content/dam/ifc/doc/2000/2007-metal-plastic-rubber-products-ehs-guidelines-en.pdf>

## 4. Baseline Data

This section introduces and determines pertinent initial information about the specific location intended for the project, as observed during the on-site visit carried out by the consultant. It includes discussions with project proponent, examination of relevant documents, and aims to establish the environmental and social context of the proposed site. The provided details encompass various aspects such as the site's geographical location, land utilization, ecological assets, air and noise pollution levels, existing energy sources, and historical as well as cultural heritage. Additionally, it offers an overview of the socio-economic conditions and employment situation in Hebron.

#### 4.1. Project Location

Al-Wafa Plastic Industries Company is located in Abu De'jan area to the North-West of the center of Hebron city. The factory has Palestinian XY coordinates of: (X: 156928.52109, Y: 106669.58534). The area is not included in the urban masterplan of Hebron city, partially due to the city itself being a geo-political conflict zone and has a complicated geopolitical segregation between Palestinian and Israeli zones. Nevertheless, the factory is located within geopolitical and administrative "Area A" designation.

The factory area is distant from residential areas, with the land on which the factory premises is situated in being owned by the Juneidi family who are the factory owners and have their residences on the eastern side of the factory land as seen in the map below. Residents closest to the factory are the factory owners whose house is at the direct border of the factory land about 120 m to its East. Other residents are scattered around the factory area averaging between 120 – 150 m. and the closest community residences are in Wad Aziz, with the closest residence being 350 m to its West and the community then extending beyond.

Other residences are scattered with mixture between residential units and olive orchards and empty lands. From its Western side, the factory is bounded by company owned lands which with the land the factory is situated in amount to around 100 donums. The nearest residential areas are to its North-West in the area of "Wad Aziz", which has a primary school around 700 meters to the North-West of the factory. Al-Ahli hospital, one of Hebron's main healthcare facilities, is located 1.1 Km to the North-East of the factory.

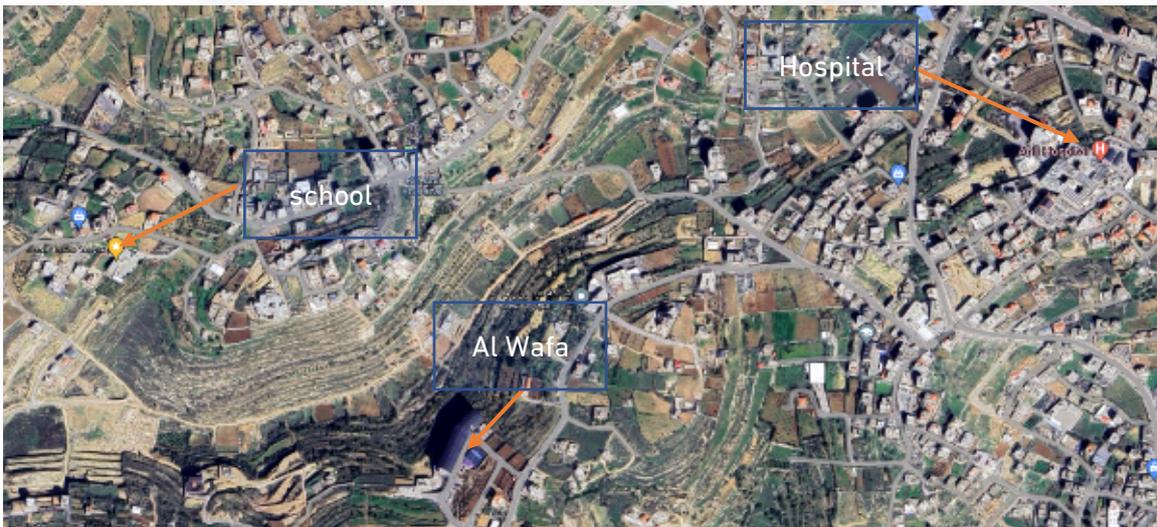
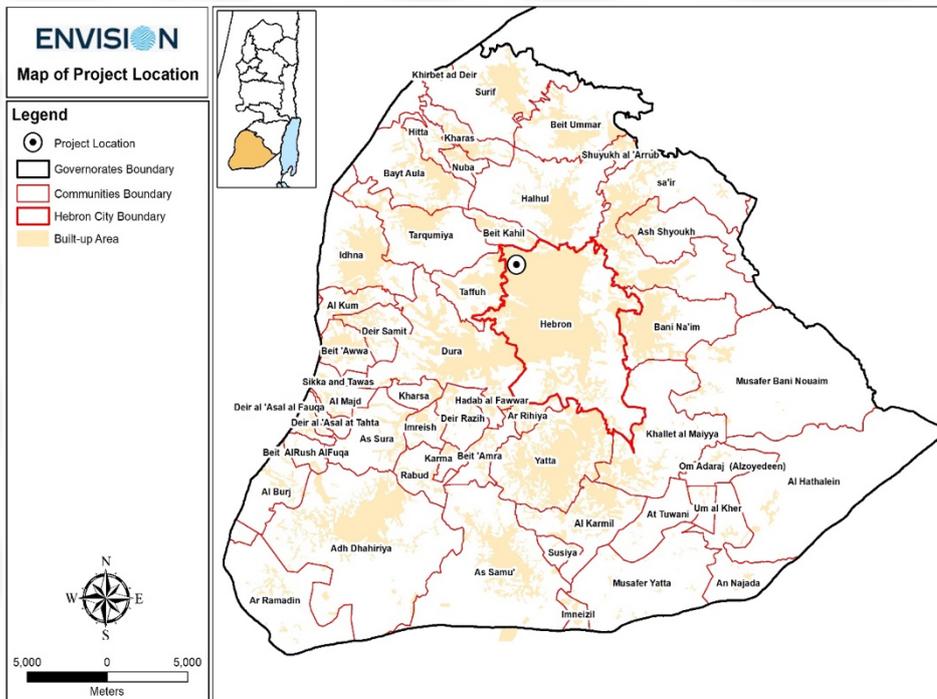


Figure 5: Vicinity of the Factory



## 4.2. Locality Overview

Hebron Governorate, the largest in the West Bank, is located in the southern part of the West Bank, covering approximately 937 square kilometers, which accounts for about 17.6% of the total area of the West Bank. The Hebron Governorate is bordered by the Bethlehem Governorate to the northeast and the 1948 ceasefire line from all other directions. Hebron City serves as the primary administrative center and the largest city in the governorate, with an area of 74.1 square kilometers. It includes 94 villages and 18 municipalities (Map 1).



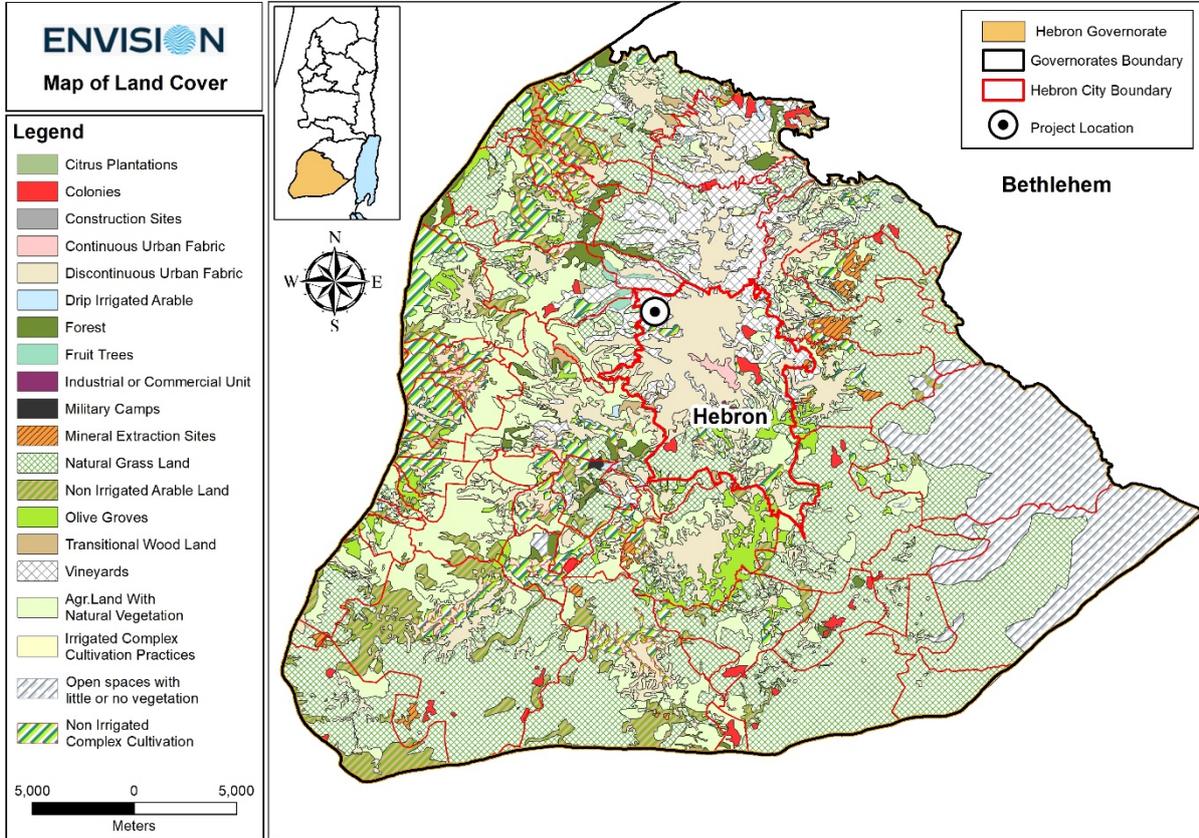
Map 1: Project Location (Based on MoLG Data)

## 4.3. Land Use

The dominant land cover in Hebron governorate includes natural grass land, agricultural lands with natural vegetation, non-irrigated arable land, and discontinuous urban fabric. In Hebron city the dominant land cover is the built-up area that defines as discontinuous urban fabric in addition to smaller areas of agricultural lands with natural vegetation and natural grass land (Map2, based on MoLG data).

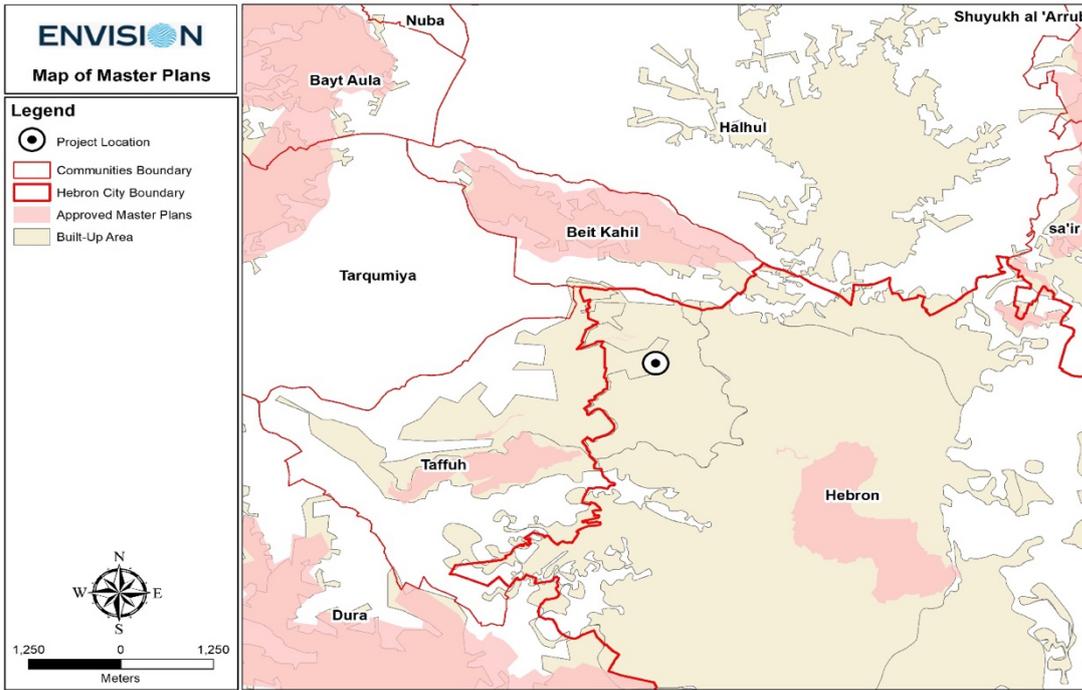
Regrettably, the project area lacks an approved master plan, as is the case for many areas within Hebron city, primarily owing to geopolitical constraints. The city has been constrained by a limited partial plan since 1944, with this historical blueprint being the only plan accessible through the Geomolg platform. Additionally, there were attempts to create new master plans in

2015 and 2018, but none of them have been officially approved. As a result, the project area doesn't have specific land classifications or clear construction rules. The municipality mainly uses national spatial plan guidelines for making decisions (Map3)<sup>6</sup>.



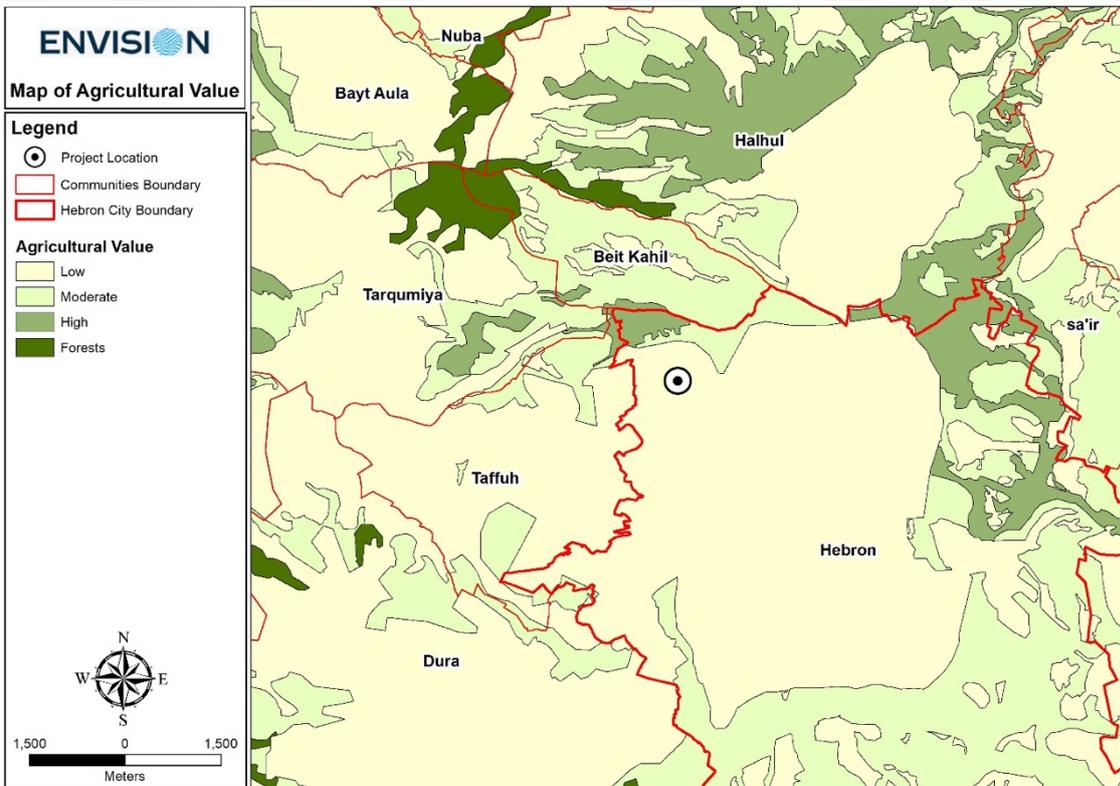
Map 2: Land Cover (based on Molg data)

<sup>6</sup> Hebron SDIP: <https://www.mdlf.org.ps/Document/HEBRON%20SDIP%202018-2021.pdf>



Map 3: Master Plans (based on Molg data)

According to the national spatial plan classifications, the vast majority of Hebron city lands are classified as low agricultural value and the project is also located on agricultural lands of low value. moreover, this type of land does not impose any restrictions on the construction or development (Map4).



Map 4: Agricultural Value (based on Molg Data)

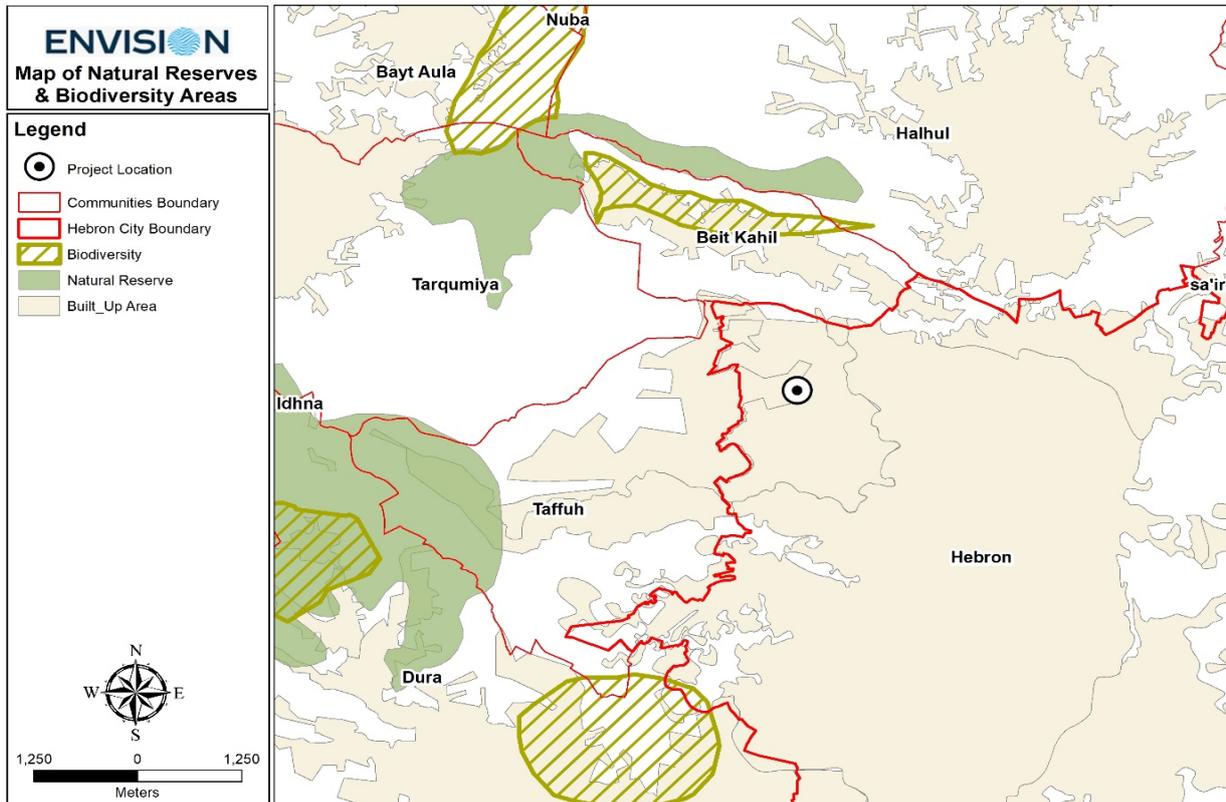
#### 4.4. Biota

##### 4.4.1. Flora

While the southern region of the West Bank boasts several biodiversity areas, forests, and natural reserves, it's important to note that the project area doesn't encompass any of these features. Instead, it's situated within a larger urbanized area (Map5).

##### 4.4.2. Fauna

The Mediterranean Zone flora is characteristic maquis forest with trees like oaks and Pistacia. The plant cover then decreases proportionally and includes different species as we head south and east into Irano-Turanian, Saharo-Arabian and then Ethiopian-Sudanese flora. This creates diverse habitats and results in distinct assemblages of animals such mammals, reptiles, amphibians, fishes, birds and different groups of Invertebrates. Animal species in Palestine include; birds (551 species), mammals (130 species), Reptiles (97 species), Amphibians (8 species), Invertebrates (More than 13000 species)<sup>7</sup>.



Map 5: Natural Reserves & Biodiversity Areas (based on Molg data)

<sup>7</sup> <https://www.palestinature.org/fauna/>

Nevertheless, the project site has not been reported to house any endangered or protected species and it is not anticipated that the project operations could result in any impacts on flora and fauna given the restricted spatial nature of it being housed within the factory building.

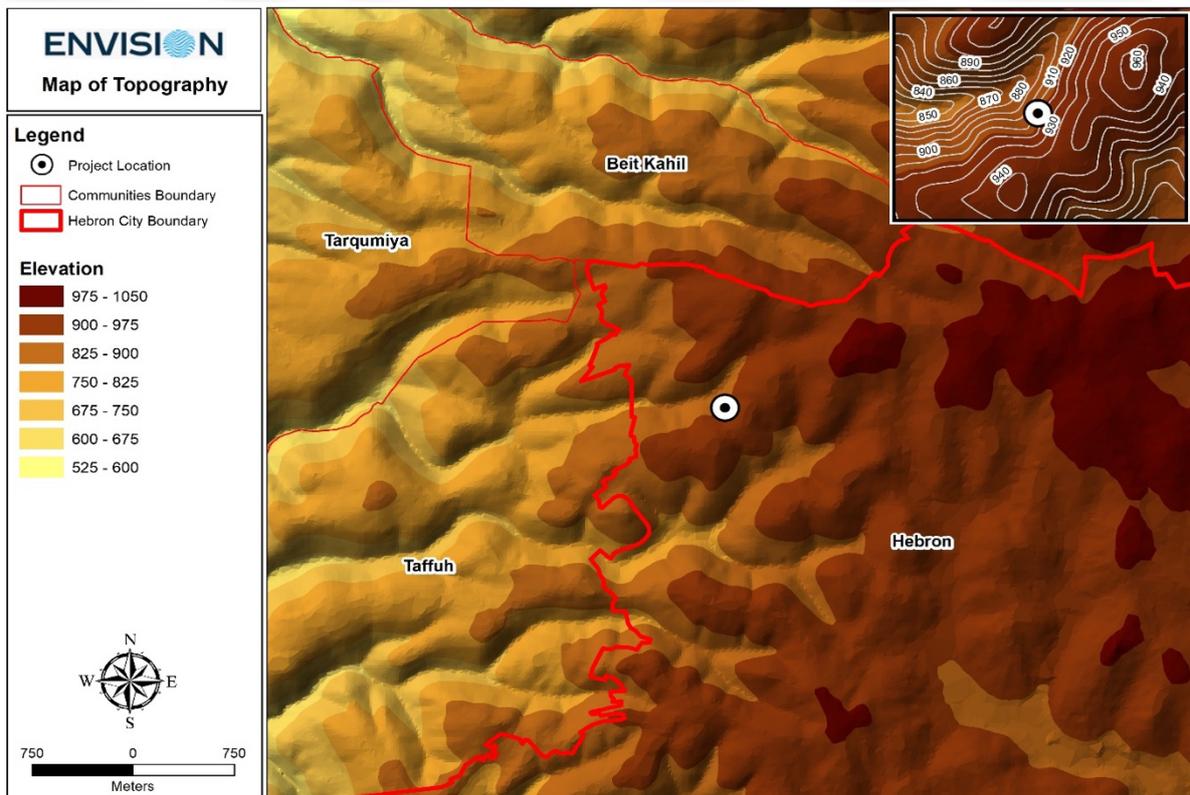
#### 4.4.3. Protected Areas

Hebron governorate, as a whole, is home to 10 natural reserves scattered in various directions in relevance to the project site. The closest two of these reserves to the project site are; Suba reserve, situated 3.7 km to the west, and Wadi el Quff, which is 2.5 km to the north. It's important to highlight that the project location itself does not fall under any protected area classification and that these reserves are not within the area of influence of the project (Map5).

#### 4.5. Topography

Hebron Governorate features a broad range of elevations, spanning from 140 meters below sea level up to 1,014 meters above sea level. The highest point, reaching 1,014 meters, is located in Halhul, making it the highest point not only in the governorate but also in the entire West Bank. In contrast, the lowest point descends to 140 meters below sea level in the Ar Rawain area<sup>8</sup>.

WPI facility and owned lands in particular fall within the elevation range of 900 to 975 meters above sea level. To be more precise, according to detailed topographic maps, the project site (the factory) is situated at an elevation of 905 meters above sea level (Map6).



Map 6: Topography (based on Molg data)

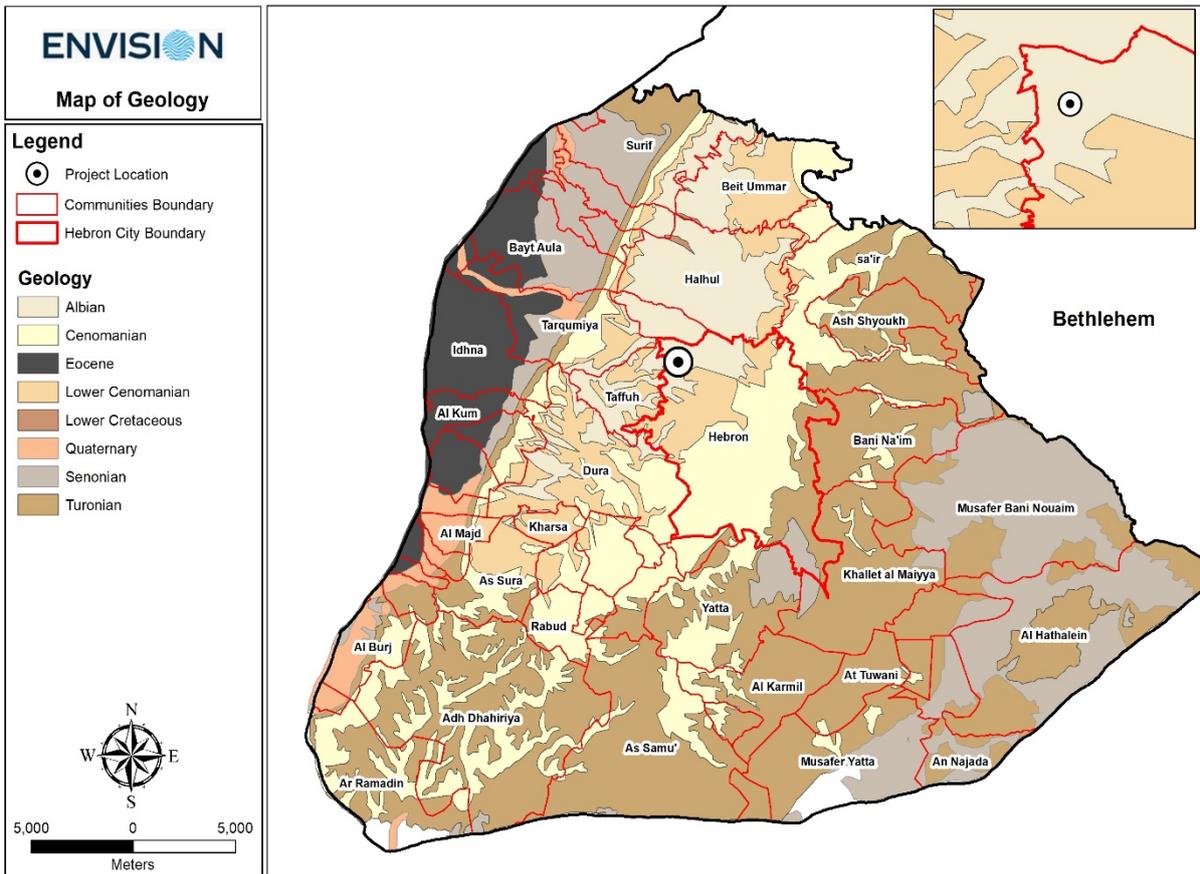
<sup>8</sup> The applied research institute (Arij), 2009: Locality Profiles and needs assessment in the Hebron governorate

#### 4.6. Geology & Pedology

Hebron area exhibits primarily the following lithological units:

- Limestone with dolomite and marl of the Cenomanian-Turonian age cover about 80% of the district
- Chalk and limestone with Chert of the Eocene age, covers the north-western part of the district and overlies the layer mentioned above.
- Metamorphic Rocks composed mainly of Clacsilicates of the Miocene age occupies the north-western section of the district.
- Marl Limestone with sandstone and conglomerates of the Pliocene age (Tertiary), cover the eastern part of the district in addition to a small area in the western part.
- Chalk-Marl with conglomerates covers a small area of the south-eastern section of the district<sup>9</sup>.

The project land is located on Albian type and surrounded by lower Cenomanian rocks (Map7).

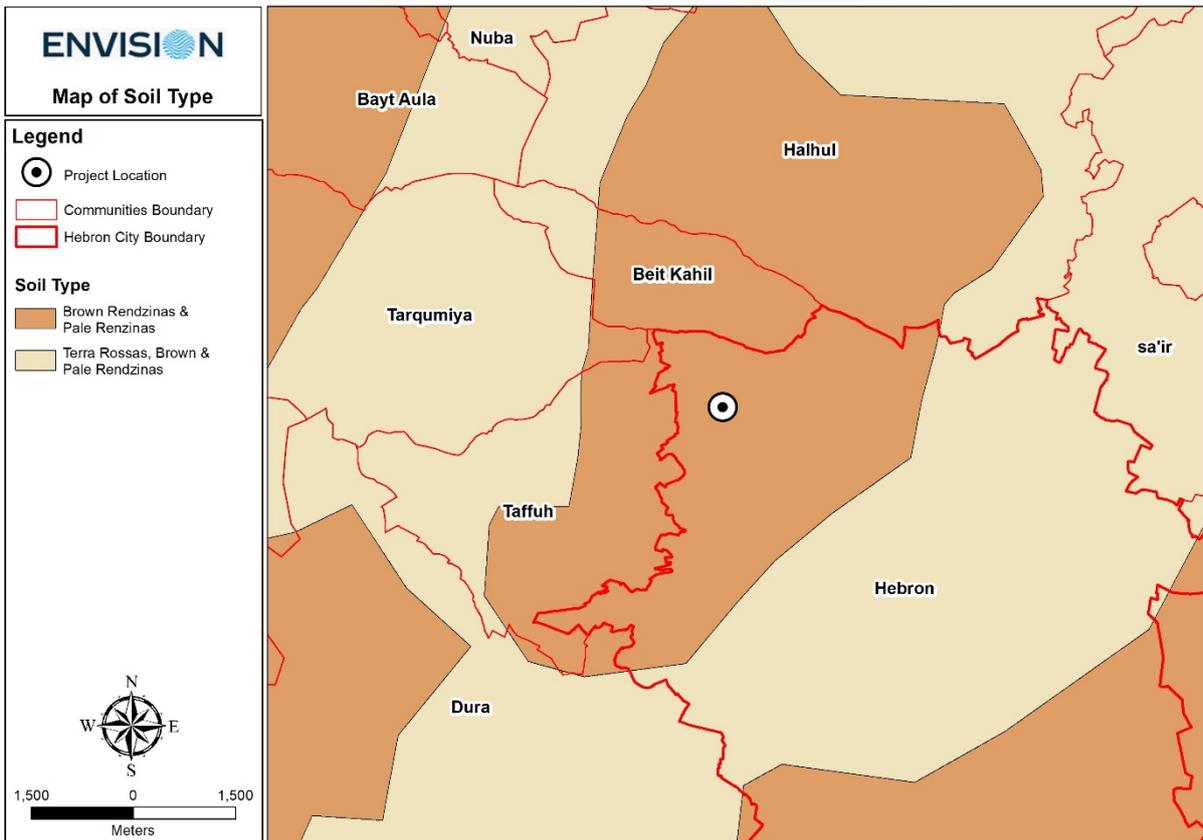


Map 7: Geology (based on Molg data)

<sup>9</sup> Arij, Environmental Profile for the west bank volume3: Hebron district.

In terms of soil composition, the Brown Rendzinas & Pale Rendzinas is the dominant soil category in the project location. This soil type has a typical pH for between 5 and 8, and base saturation is high. Calcium and magnesium are abundant, but potassium content is often low, so nutrient imbalances are common<sup>10</sup> (Map8).

Rendzina soils are usually poorly suited to agricultural use. Mechanical tillage is hindered by their shallowness, and the small soil volume limits their capacity to store and supply water. Additionally, these soils often occur on slopes, where the risk of erosion is high. As a result, there is much semi-natural vegetation to be found in these areas<sup>10</sup>.



Map 8: Soil Type (based on Molg data)

#### 4.7. Climate

The climate of Hebron Governorate ranges from arid to semi-arid with an increase in aridity towards the Negev desert in the south and the Jordan valley in the east and it is also influenced by its location along the eastern Mediterranean region. Winters in this area are characterized as moderate and rainy, while summers tend to be hot and dry. Regarding precipitation, data from the Palestinian Meteorology indicates that the average annual rainfall recorded for Hebron governorate in the year 2023 was approximately 595 mm<sup>11</sup>.

<sup>10</sup> Leitgeb, E.; Reitner, R.; Englisch, M.; Lüscher, P.; Schad, P.; Feger, K.H. (2013). Waldböden. Ein Bildatlas der wichtigsten Bodentypen aus Österreich, Deutschland und der Schweiz (in German). Weinheim: Wiley-VCH Verlag GmbH. pp. 83–84.

<sup>11</sup> <https://www.pmd.ps/rainy-season>

The monthly average temperature ranges from 7.5-10 °C in the winter to 22 °C in the summer. The minimum temperature is -3 °C in January and the maximum is 40 °C in August. The ground temperature ranges from a minimum of -5 °C in January, to a maximum °C in the summer season. Moreover, the mean range of annual relative humidity is 60-75%. The relative humidity reaches 40% in mid-day and increase gradually to reach 80-100% as an average at night<sup>12</sup>.

#### 4.8. Water Sources

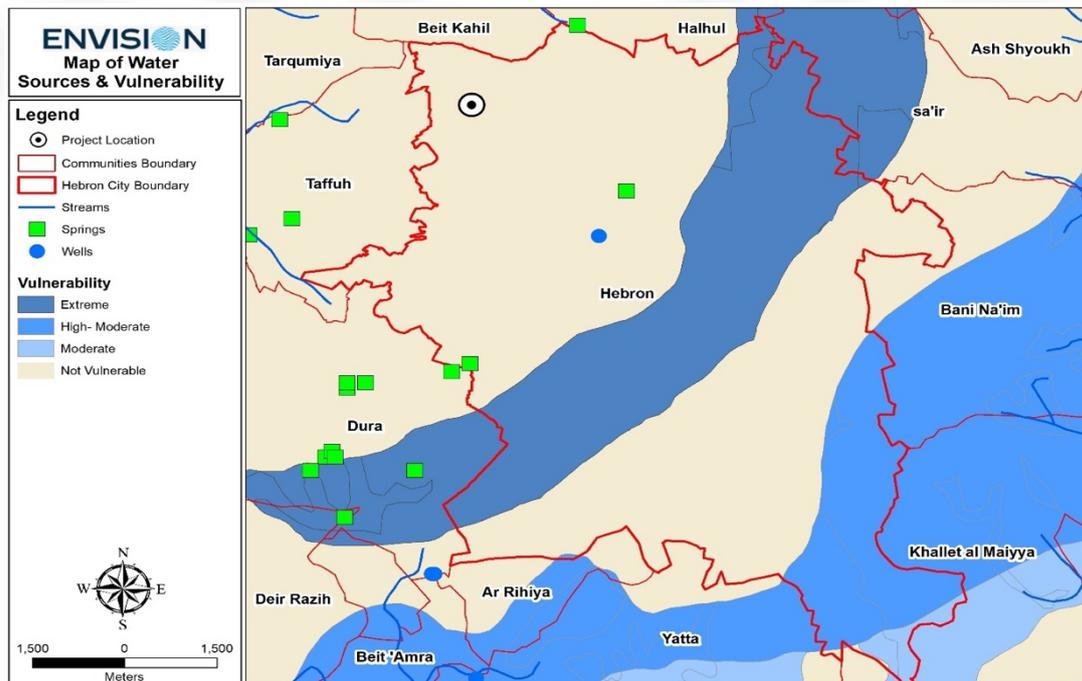
Water shortage is a serious problem facing the Hebron district, not only due to the arid and semi-arid climatic conditions and rainfall variability in the area, but also due to the Israeli strict control over the Palestinian water resources.

There are only four licensed groundwater wells in Hebron district which are used for domestic purpose. and these wells are controlled by the following:

- Hebron municipality and west bank water department which includes Fawwar wells No.1 and No.2 and whose total discharge to the network is approximately 105 m<sup>3</sup>/h.
- The Mekorot (Israeli Water Company) uses Samu' and Rihiya wells and the total discharge is undeclared to the Palestinians.

There are also 34 traditional shallow groundwater wells which are un-licensed and used for irrigation purposes<sup>13</sup>.

The project land does not contain any natural water sources and it is classified as non-vulnerable to ground water pollution; thus, it does not cause any deterioration to water sources in the district (Map9).



Map 9: Water Sources & Vulnerability (based on Molg data)

<sup>12</sup> Arij, Environmental Profile for the west bank volume3: Hebron district.

<sup>13</sup> Arij, Environmental Profile for the west bank volume3: Hebron district.

#### 4.9. Wastewater

Waste water disposal constitutes a major threat to health human and the environment in Hebron governorate. The city is served by a combined sewer system, with more than 70% of the existing population connected to the system. Where in unconnected areas, cesspits are the common method for households to dispose wastewater<sup>14</sup>.

The present network is very old and has many problems. Such as: accumulation of solid waste from stone cutting factories, workshops, and slaughterhouses causes regular clogging and flooding of the sewer system; and the absence of a storm water drainage system causes overload of the network, which results in blockage and flooding thereby leaving stagnant pools at the streets.

Waste water from the network is transferred through a main pipeline to the south of the city near wadi As-Samn, where the pumping station is installed. It should be pumped to the sedimentation ponds located to the east of the city, but for several reasons, the pumping station is not functioning. The wastewater flows through wadi As-Samn to the south west, impacting the crops, fruits and vegetables which are freely planted and irrigated along the sides of the wadi<sup>15</sup>.

Due to this unacceptable reality of waste water, a treatment plant project was initiated in 2018 but did not start functioning yet because of different reasons and complications including some clashes with the local community, and financial conflict between the contractors.

#### 4.10. Electricity Services

The electricity network in Hebron follows under the jurisdiction of A non-profit organization that manages the electricity sector in the area called Hebron electric power co. (HEPCO). This authority provides electricity service to Hebron, Halhul, Essa Loza, Beit Enun, Baq'a, Dowara Oddese, Jalajel, and Qilqes Aqabet Ngile<sup>16</sup>. HEPCO covers WPI as well.

#### 4.11. Air Quality and Noise

Some air pollutants are formed and emitted through natural processes. However, near cities and in populated areas, more than 90% of the volume of air pollution is a result of human activities. The main sources of air pollution are, energy production, transportation and industry. Hebron district has a fairly dense population and an active industrial sector; these factors play a significant role in increasing air pollution. Dust levels are naturally high in Palestine, where hot and dry sand storms from the eastern desert (khamaseen) occur frequently.

Industry is also a major source of gaseous emissions. Although large industrial plants with high emissions production don't exist, clusters of small-scale plants operating obsolete equipment, and under little regulation are significant polluters. However, the project site and locality have not been noted to entail any emission generating industries.

In terms of noise and nuisance, the project area is a calm suburban area with relatively low traffic and no industrial activities other than WPI. The project factory is located over 100 meters

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<sup>14</sup> Environmental, Social, and Cultural Heritage Impact Assessment to Support the Hebron Governorate Wastewater Management Project, Universal Group & CEC, June 2013: <https://www.pwa.ps/userfiles/file/تقارير/ESCHIA%20Hebron%20Report-Final%20202.pdf>

<sup>15</sup> Arij, Environmental Profile for the west bank volume3: Hebron district.

<sup>16</sup> <https://www.hepco-pal.com/en/about-au/concession-area>

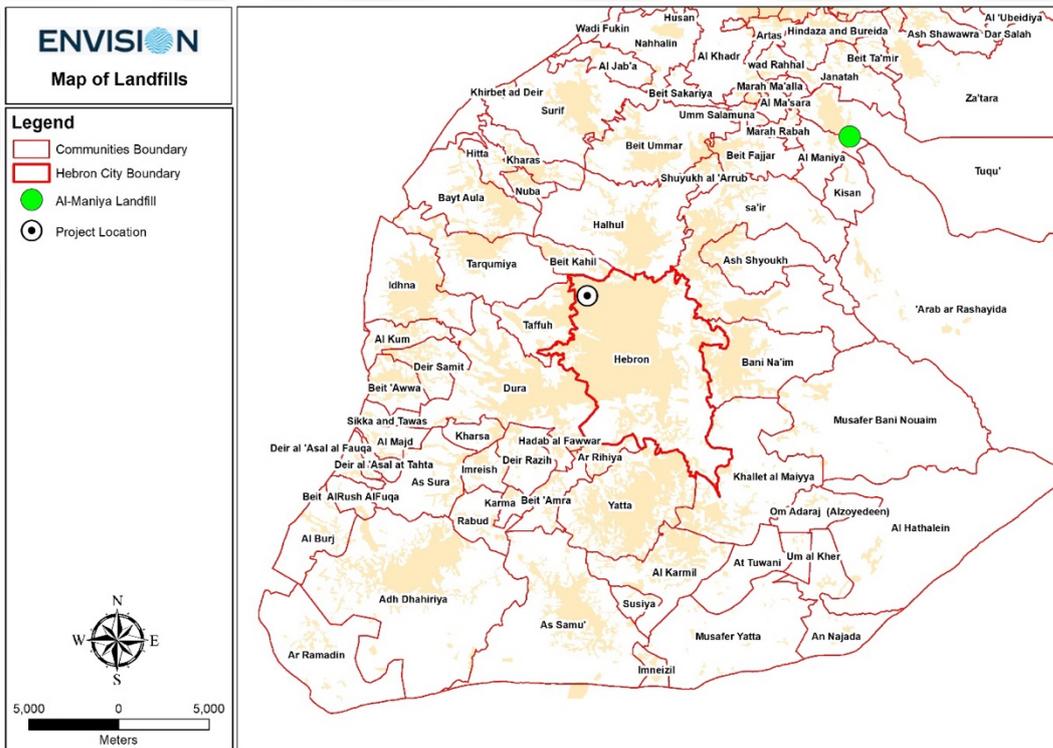
to the West of the main road, and as the operations are housed within the factory building, outdoor noise levels in the area are negligible.

#### 4.12. Solid Waste

The responsibility for waste collection in Hebron governorate is divided between the municipalities, town or village council, and UNRWA in the refugee camps. There are common methods for waste disposal in the district: municipal or village council waste is disposed in waste dumps or open dump sites, and a large amount of individual waste is disposed randomly in nearby open spaces or road sides<sup>17</sup>.

Over the past decades the responsible parties have paid little attention to improving the financial and technical management of their solid waste operations and have made no attempt to encourage re-use and recycling of materials. Lack of public cooperation is also a significant obstacle to effective solid waste management<sup>18</sup>.

The southern governorates (Hebron & Bethlehem) are served by Al-Meniya landfill located to the east of Al-Maniya village and 17 km to the north-east of Hebron city. This landfill receives around 600 tons of solid waste per day and it is causing a huge pollution problem to the adjacent communities. Moreover, there no adjacent landfills to the project location (Map10).



Map 10: Landfills (based on Molg data)

<sup>17</sup> Arij, Hebron City Profile

<sup>18</sup> Cesvi, Solid waste management in the occupied Palestinian territories.

#### 4.13. Socio-economic situation

The current population of Hebron governorate is distributed among more than 95 community centers, where about 85% of the population live in urban areas, 12.7% live in rural areas, and the remaining 2.3% live in refugee camps. According to the Palestinian Central Bureau of Statistics (PCBS, 2021) data, the population of Hebron governorate in 2017 was 705,053, and it is projected to reach 884,830 by 2026. In the city of Hebron, the population in 2017 was 199,319 and is expected to reach 250,142 by 2026<sup>19</sup>. Notably, Hebron community has a youthful demography, with approximately 41.4% of the population being younger than 15 years old<sup>20</sup>.

The population density of Hebron City where the project is located, is 2692 individual per square kilometer and they consist of 28.2% of the governorate population.

Data collected from Hebron municipality reveals that the city's population primarily relies on the trade sector for their livelihood. Approximately 50% of the total labor force in the city is engaged in the trade sector. The agricultural sector ranks as the second most crucial sector for residents, with 15% of the labor force working in this field. The industrial sector mirrors the agricultural sector, also employing around 15% of the labor force<sup>21</sup>.

In recent years, there has been a notable decline in employment within the government and private sectors in Hebron City, with only about 5% of the labor force now working in these sectors. Additionally, approximately 5% of Hebron's workforce is employed in the Israeli labor market sector (Table3).

Table 2: Population Percentage Working in Economic Sectors

Sector	Percentage
Trade	50%
Agriculture	15%
Industrial	15%
Services	10%
Employee	5%
Israeli labor market	5%

#### 4.14. Historical & Cultural Heritage

Hebron, also known as Al-Khalil Ar-Rahman, meaning "the beloved of God" in reference to Ibrahim, is among the world's oldest continuously inhabited cities. This historical significance has endowed it with a unique and invaluable old city. At its heart lies Al Haram Al Ibrahim, which houses the Tomb of Ibrahim El Khalil. This sacred site traces its origins back to the days of Herod

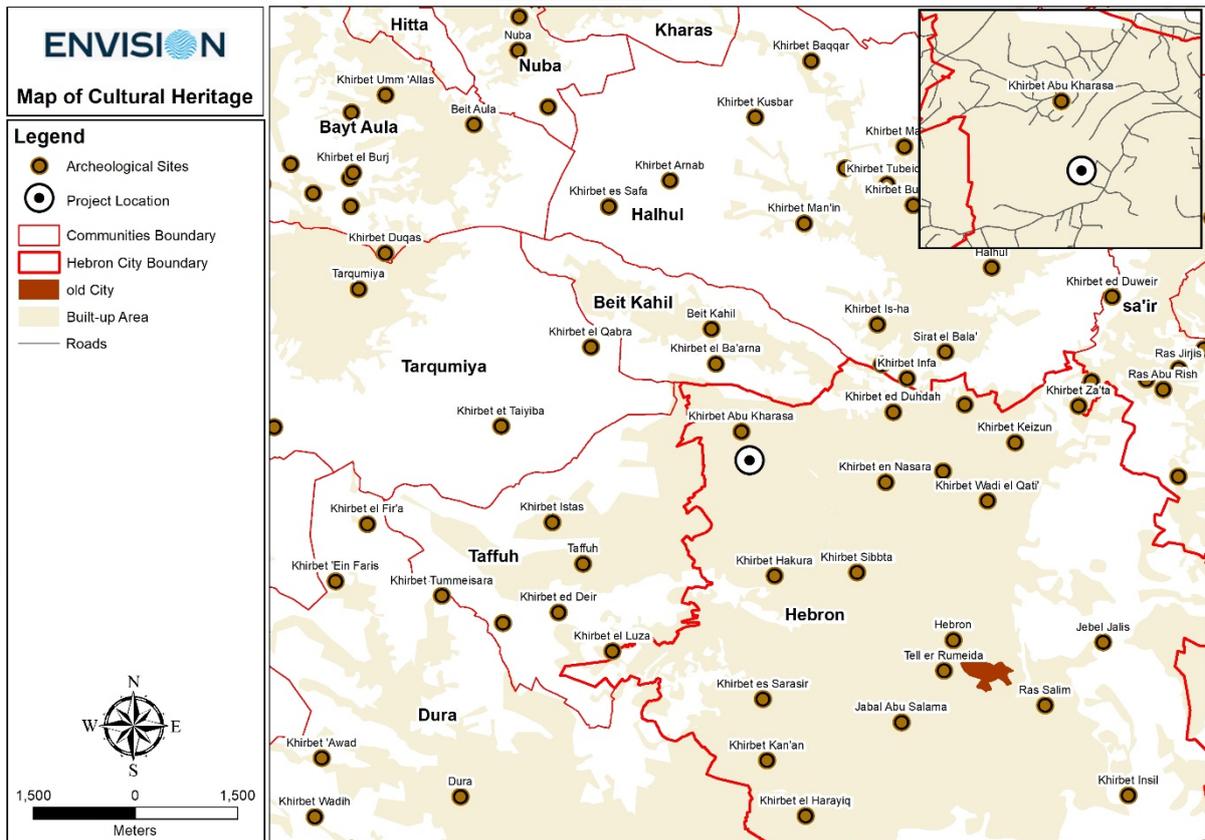
<sup>19</sup> PCBS (2021): Projected Mid -Year Population for Hebron Governorate by Locality 2017-2026

<sup>20</sup> PCBS (2017): Hebron statistics, <https://www.pCBS.gov.ps/Downloads/book2425.pdf>

<sup>21</sup> Arij, Hebron City Profile

and underwent expansion during the Crusader period<sup>22</sup>. The city of Hebron boasts numerous significant archaeological sites. Foremost among these is the Cave of the Patriarchs, revered by followers of Judaism, Christianity, and Islam. Other notable locations include Al-Sultan Pool, Hebron Museum, Al-Balluta, and Al-Maskubiya Church.

Regarding the Al-Wafa Plastic Industries project location, the available data from MoLG indicates the presence of just one historical site in the vicinity to the north. This site, known as Khirbet Abu Kharasa, is situated at a distance of 445 meters from the project location. Therefore, the project location itself does not include any notable historical, cultural, or archaeological significance



Map 11: Cultural Heritage (based on Molg data)

<sup>22</sup> Arij, Environmental Profile for the west bank volume3: Hebron district.

## 5. Assessment of Existing E&S Capacity

The conducted E&S audit has revealed that while the company has obtained ISO 14001 and has different consultants and external auditors assisting its compliance, it does not have a dedicated internal structure for the management of its E&S commitments, including the implementation of the CAP and this ESMP. The company's quality engineer acts as its E&S focal point.

Additionally, in terms of regulatory compliance, and as stated in section 2.4 on previous environmental assessment, the company does not yet have an environmental approval from EQA on their expansion project, hence the company shall coordinate with MoNE, EQA, and MoH regarding their requirements for the project, through submitting an expansion permit request at MoNE and an environmental approval request at EQA.

Moreover, in line with Law No.3 of 2019 on Industrial Facilities OHS Supervisors and Committees, the company is required to have 1 technical supervisor in addition to 2 specialized supervisors as the plastic industry is considered a hazardous occupation in line with Cabinet Decision No.9, year 2000 regarding the level of hazard associated with labor sectors. These hirings have not yet been reported by the time of this report. Therefore, the Company shall hire the OHS supervisors as well as establishing the OHS committee no later than by April 2024.

In terms of OHS capacity building specific to operating the thermoforming production line, the supplier should provide an OHS plan as well as training to company staff, this has to be included in their responsibilities in line with Chapter 8. The company has contracted the OHS and Environment Center of the polytechnic university to conduct OHS trainings for workers and supervisors. However, no log has been provided and no timeline for these trainings has been clear. E&S capacity building through E&S awareness and orientation is needed once the ESMP is approved. As such, and in accordance with Law No.3 of 2019, the OHS supervisors will also take on the responsibility of implementing the factory's General OHS plan available in Chapter 7 below, and will carry out capacity building activities as needed and as highlighted in the ESMP Matrix.

## 6. Potential Environmental and Social Impacts and Proposed Mitigation Measures

The main potential impacts that could arise from the different phases of the Project were identified and their significance was assessed so that any potentially significant impacts can be properly mitigated and monitored. The assessment of potential impacts has been done through analyzing different project activities, their relevant E&S risks, probability of materialization, duration of potential impacts, and their respective area of influence. Hence envisaging possible changes to the physical and social environments. Each potential impact was qualitatively analyzed to classify its significance. Further classification was illustrated for each impact into positive and negative impacts, short-term and long-term impacts as well as clearly identifying any impacts that may not be mitigated.

The identified E&S risks and their classification in this chapter have been based on the conducted E&S screening report. Additionally, the consultant conducted a desk review of WPI documents, licenses and plans, in addition to the E&S audit and E&S screening reports provided by the Finance for Jobs II (F4J II) Project, environmental and social reports (ESIAs / ESMPs) for similar projects and ones in the same location, relevant legislations and GIIPs, scientific articles and publications, situational reports, and other data to conduct a comprehensive analysis of all baseline conditions, associated potential risks and impacts, and their appropriate mitigation measures.

## 6.1. Project Anticipated Positive Impacts

### - ECONOMIC IMPACTS:

- Contributing to the revitalization of the industrial and commercial activities in the company's surrounding areas.
- Increase the Palestinian balance of trade, as the company will enhance Palestinian exports as a result of the expansion.
- Replacement of imports and satisfying demand by consumers in the area.
- Secure sustainable flow of essential plastic products and help overcome the risks of mid-to-long-term border closures and shortage of supplies.

### - SOCIAL IMPACTS:

- Creating 80 additional employment opportunities directly through the company and indirectly through the company's supply and marketing chains.
- Maintaining around 250 current job opportunities.
- Provide a substitute product at competitive prices.
- The project connects the various actors within the value chain - input suppliers, traders, and public and private sector companies - in a mutually beneficial way.

### - GENDER IMPACTS:

- Enhancing the role of women in obtaining job opportunities as the company employs around 70% women of its workforce.

## 6.2. Planning and Procurement Phase

- The company shall coordinate with MoNE, EQA, and MoH regarding their requirements for the project.
- The company shall apply to MoNE for an expansion project license and coordinate to ensure meeting licensing requirements by MoNE. The company shall also submit an environmental approval request at EQA.
- in line with Law No.3 of 2019 on Industrial Facilities OHS Supervisors and Committees, the company is required to have 1 technical supervisor in addition to 2 specialized supervisors
- The Company shall hire the OHS supervisors as well as establishing the OHS committee no later than by April 2024.
- In terms of OHS capacity building specific to operating the thermoforming production line, the supplier should provide a thermoforming specific OHS plan as well as training to company staff.
- Once hired, the OHS supervisors shall provide OHS capacity building and training per the company's general OHS plan available in section 6.10 below.
- E&S capacity building through E&S awareness and orientation by the E&S focal point is needed once the ESMP is approved.
- WPI To send a commitment letter or email to DAI on its willingness and commitment to implement the CAP and the ESMP no later than end of February 2024.

## 6.3. Impacts on Air Quality

### I- Installation Phase:

#### ❖ Risks:

- DUST AND EMISSIONS FROM FINISHING WORKS: Sanding, cutting, or drilling during finishing works can generate dust and particulate matter.

- **INSTALLATION ACTIVITIES:** The process of installing the thermoforming production line, including electricity connections, chillers, and accessories, may involve activities that could generate dust, use of solvents for equipment installation and painting, and potential emissions from welding or cutting which could pose air quality risks.

❖ **Mitigation Measures:**

- **DUST CONTROL DURING FINISHING WORKS:** Implement dust suppression techniques such as wetting down surfaces and sealing off work areas to minimize the spread of particulate matter as needed.
- **USE OF LOW-VOC MATERIALS:** Select and utilize low-VOC paints, adhesives, and solvents during installation activities to reduce the emission of volatile organic compounds.
- **FUME MANAGEMENT DURING EQUIPMENT SETUP:** Ensure that the premises for the thermoforming machine and expansion project include local exhaust ventilation (LEV) systems that are installed and functioning during welding and cutting to capture fumes at the source, and ensure that areas are well-ventilated.

❖ **Significance:**

Air quality impacts during the installation phase have transient and short-lived minor civil works and setup activities. Hence this phase is deemed Low in significance to air quality impacts due to its temporary nature and containment within the installation site. Standard mitigation measures stated are expected to minimize and mitigate these transient risks.

**II- Operational Phase:**

❖ **Risks:**

- **EXISTING FUMES FROM CURRENT OPERATIONS:** The E&S Audit has revealed that the existing production lines while utilizing thermoplastic polymers are not considered harmful to workers health. However, toxic fumes might result from the mixture under heating<sup>23</sup>. During shaping operations for nonreactive plastics (e.g., PP), the base polymers are stable well beyond the required processing temperatures with few exceptions. During shaping, however, water vapor, low boiling point additives, and monomer trapped in the polymer may be released. When PP is heating above the recommended temperatures, Aldehydes, Butane, and alkenes may be detected in the fumes. These could cause irritation to the eyes, nose, throat, coughing among other health concerns.
- **EMISSIONS FROM EXPANSION PRODUCTION PROCESSES:** Despite the production line being of latest technology and hence high efficiency and conformance to standards, in addition to the involvement of the PIA in the procurement process which employs World Bank Standards Procurement Practices and GIIPs, there are still risks in terms of low capacity and knowledge to these machines as they are new to the company, hence potential risks could arise in terms of setting of temperatures and hence release of fumes and VOCs.
- **EMISSIONS FROM EXISTING DIESEL GENERATORS:** while as revealed by the site visit and the E&S audit, the company has two diesel generators which are on standby and have not been used as the electricity supply is adequate in the area. One of the diesel generators only is equipped with an air filter.

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<sup>23</sup> EHS Guidelines for metal, plastics, and rubber products manufacturing, IFC : <https://www.ifc.org/wps/wcm/connect/c83d65a2-7332-40bd-84d2-6e46d8ac9632/Final%2B-%2BMetal%252C%2BPlastic%252C%2BAnd%2BRubber%2BProducts%2BMnfg.pdf?MOD=AJPERES&CVID=nPthciI&id=I323153287593>

- DUST FROM SHREDDING AND HANDLING OF RECYCLED MATERIALS: The integration of recycled inputs into the manufacturing process might generate dust, especially during the shredding, handling, and processing of recycled materials.
- VENTILATION SYSTEM EFFICIENCY: The need to maintain high indoor air quality requires efficient operation of ventilation systems, which may be challenged during peak production times or if maintenance is not kept up to date.
- MAINTENANCE AND REPAIR ACTIVITIES: Maintenance and repair activities can involve the use of solvents, adhesives, and other materials that may emit VOCs, as well as the generation of dust and particulate matter from mechanical work.
- EMISSIONS FROM VEHICLES: the movement of vehicles for import of raw produce and export of final products result in emissions that have significant impacts if routes passing within town are utilized.

#### ❖ Mitigation Measures

- AIR QUALITY MEASUREMENTS: in its current production operations, the company should conduct air quality, particularly fumes, measurements to ensure that their current operations are within acceptable limits to OHS. Additional corrective actions and mitigation measures will be determined based on the results of the measurements. These measurements could not have been conducted for two reasons; the current political situation and restriction on movement, and the lack of testing equipment specific to fumes in the West Bank, hence it has to be done once conditions allow.
- PERSONAL PROTECTIVE EQUIPMENT: Workers have been noticed to be provided with, and commit to the use of gloves, hairnets, and work clothing. However, and depending on the testing results other PPEs might be required such as goggles, masks, and industrial grade masks.
- TEMPERATURE CONTROLS: Implement strict temperature control measures to ensure that polymers are not heated beyond recommended temperatures, minimizing the release of aldehydes, butane, and alkenes.
- EQUIPMENT TRAINING: As training is included within the anticipated activities, ensure a comprehensive knowledge transfer and intensive training for operators on optimal machine operation to prevent incorrect temperature settings that could lead to the release of VOCs and fumes.
- MACHINERY MAINTENANCE: ensure that all equipment and machinery have a maintenance schedule prepared for them.
- ELECTRICITY GENERATORS MANAGEMENT: Ensuring both diesel generators are equipped with high-efficiency air filters and are maintained regularly. Install an air filter for the second generator and ensure that maintenance is being conducted for both regularly per the manufacturer's specifications.
- DUST MANAGEMENT IN SHREDDING AND RECYCLING: Employ advanced dust collection systems and localized exhaust ventilation at points where dust is generated during the recycling process.
- HVAC SYSTEM INSTALLATION AND UPKEEP: Ensure that the production area is equipped with a heating, ventilation, and air conditioning (HVAC) system to reduce entrapment of emissions as well as ensuring optimal operating temperatures for machinery and for OHS of the workers. Ensure that maintenance is adequately conducted for HVAC systems to guarantee their efficiency, particularly during high-demand periods.
  - Filter air exhaust from material handling and granulation areas using a cyclone and / or baghouse for particulates from raw material.
  - Ensure Installation of ventilation control systems, especially at the points of highest processing temperatures along the production line.
  - Explore options depending on air quality tests for VOCs and fumes that could include; Installation of local exhaust extraction systems and activated carbon

adsorbers; · Installation of recuperative / regenerative thermal oxidizers, catalytic / regenerative catalytic oxidizers, condensers or biofilters. The engineering firm should advise on the most appropriate solution based on quality tests.

- **SAFE MATERIALS FOR MAINTENANCE:** Use of low-VOC solvents and adhesives in maintenance work, executed in well-ventilated spaces or with specialized exhaust systems to capture emissions.
- **VEHICLE EMISSION CONTROL:** Optimize vehicle routes to avoid passing through densely populated areas and maintain vehicles to ensure emission levels are minimized.

❖ **Significance:**

The impacts on air quality during the current factory operations (prior to expansion) and in line with the findings of the E&S audit are restricted spatially to the production areas. Nevertheless, considering the probability and severity of potential impacts, coupled with the long-term nature of operations, the significance of air quality risks during the operations phase is initially rated as Moderate. However, the precise significance rating can only be established once the air quality and fumes tests have been conducted. Hence, with the high potential for mitigation through established control measures, the residual risk can be managed, mitigated, and their significance can be lowered.

## 6.4. Noise

### I- Installation Phase:

❖ **Risks:**

- **DRILLING, CUTTING & FINISHING WORKS:** Noise could result from the use of drills and rotating equipment during finishing works.
- **NOISE FROM MOVING TRUCKS:** The movement of trucks loaded with building materials and debris could cause nuisance to adjacent areas.
- **NOISE FROM MOVING STORAGE AREA TO THE NEW BUILDING:** Utilizing forklifts, trucks, and other vehicles to move the storage stock to the new building could result in nuisance and disturbance.
- **WORKING PAST DESIGNATED HOURS:** the Palestinian outdoor noise level guidelines establish specific levels for noise during daytime and lower ones for nighttime depending on the nature of the area. As the residential areas, the permissible levels are 50 dB max. in daytime and 40 max. at nighttime. Where daytime is defined as from 7AM to 8PM. A risk during this phase of the project is to exceed these levels especially if any works, especially the outdoor works such as movement of storage material, or finishing works for any reason, are to be conducted during nighttime.
- **PROCUREMENT OF HIGH NOISE EQUIPMENT AND MACHINERY:** The machinery should be ensured to adhere to GIIP and national standards on noise levels. The inclusion of these requirements into bidding documents should be ensured.

❖ **Mitigation Measures:**

- **ACTIVITY SCHEDULING:** Restrict drilling and other noise generating activities to daytime only.
  - Ensure that heavy machinery or any noise producing activities are prohibited after 8 PM till 7AM and all-day during Fridays and any public and local holiday, unless an approval has been obtained by the local authorities.

- Keep close coordination with the municipality, neighbors, and other stakeholders. Inform them of the expected working schedule and sources of nuisance during stakeholder engagement activities.
- OCCUPATIONAL HEALTH AND SAFETY: Provide workers with high performance earmuffs or earplugs as needed and depending on the noise level and activity.
- NOISE LEVEL MANAGEMENT: Ensure that noise levels do not exceed the recommended guidelines. Where some activities inevitably produce noise levels that are higher (drilling), these must be short duration and not exceed the Ministry of Labor's Decision No. 4 of 2005 on Safe Levels of Noise Exposure in the Workplace.
- MACHINERY AND VEHICLES MAINTENANCE: Ensure that the machinery and vehicles are well-maintained.
- MACHINERY SELECTION: Ensure procurement specifications include noise level requirements compliant with GIIIP and national standards.

❖ **Significance:**

Noise related impacts during the installation phase have a short-term nature and are not expected to have a high level of emission or severity. Hence this phase is deemed Low in significance. Standard mitigation measures stated are expected to minimize and mitigate these risks.

**II- Operational Phase:**

❖ **Risks:**

- HIGH NOISE LEVELS FROM CURRENT OPERATIONS: The E&S Audit has revealed that the noise levels exceed the national permissible limits (90-100 dB near production lines) as well as The Minister of Labor Decision No.4 of 2005 on Noise Level Exposure in the Workplace, as well as GIIIP such as NIOSH recommendations and OSHA 1910.95 (a)&(b) regarding exposure periods to different noise level. Outside the factory there has been no noise or vibration noticed and the levels are within PSI Ambient noise level standards.
- PRODUCTION LINE NOISE: The air compressor, and pressure molding and other activities could result in intervals of high noise, posing OHS noise risks.
- VEHICULAR NOISE: Unmaintained and overloaded vehicles are expected to generate higher levels of noise than anticipated.

❖ **Mitigation Measures**

- NOISE LEVEL MANAGEMENT: Implement administrative and engineering controls to reduce noise at the source within the factory. This includes routine maintenance of current machinery to prevent excessive noise and the installation of noise dampening materials around high-noise areas.
- NOISE LEVEL OPTIMIZATION: Ensure all machinery, including the production line, is fitted with noise-dampening materials and silencers where feasible. Regular maintenance should be performed to reduce noise emissions from machinery.
- ACOUSTIC INSULATION: Install acoustic barriers or insulation around high-noise areas, particularly near the air compressor and thermoforming production line to contain noise within the facility.
- WORKER PROTECTION: Provide personal protective equipment (PPE), such as earplugs or earmuffs, to workers in high-noise areas and enforce usage protocols in line with OSHA 1910.95 (a)&(b) regulations.
- MONITORING AND TRAINING: Conduct noise level monitoring, quarterly at minimum, to ensure compliance with permissible limits and provide training for workers on the risks of noise exposure and the importance of hearing conservation practices.

- ADHERANCE TO NATIONAL NOISE REGULATIONS: The factory shall adhere to the Palestinian Standard on Ambient Noise Levels (PS 840- 2005), where for residential areas this is defined as 50 dB max. in daytime and 40 max. at nighttime
- USE OPTIMIZATION: Optimize the use of machinery that generate noise (e.g., turn off when idle).
- MAINTENANCE: Continuous maintenance of vehicles and equipment in accordance with the manufacturer's recommendations.
- VEHICULAR MOVEMENTS: Limit the movement of vehicles to daytime only. Avoid roads that are adjacent to Noise Sensitive Receptors through logistics planning (e.g., schools, hospitals, places of worship).

❖ **Significance:**

The impacts relevant to noise during the operational phase are mostly restricted spatially to the production areas, except for vehicular movements. Nevertheless, considering the probability and severity of potential impacts, coupled with the long-term nature of operations, the significance of air quality risks during the operational phase is rated as Moderate as the E&S Audit has revealed that noise levels close to production lines are higher than permissible limits and exposure should not be for long periods. Nevertheless, with the high potential for mitigation through established control measures, the residual risk can be managed, mitigated, and its significance can be lowered.

## 6.5. Traffic and Vehicular Movement

❖ **Risks:**

**I- Installation Phase:**

- MOVEMENT OF CONSTRUCTION VEHICLES & WASTE TRUCKS: During finishing works & installation of new equipment and machinery, as well as the movement of vehicles to relocate the storage stock into the new building, there will be an increase in vehicle movement. The duration of this increased movement is expected to be short, and due to the distance of the factory from the road and from sensitive receptors, its severity is expected to be low as well.
- ACCIDENTS: improper driving practices, speeding, overloading the vehicles, lack of maintenance of break and other mechanical parts of vehicles could cause accidents. Most common vehicular accidents on the work side could occur during loading/unloading activities especially when reversing.

**II- Operational Phase:**

- IMPORT OF RAW MATERIAL & EXPORT OF FINAL PRODUCTS: The daily movement of vehicles to and from the new factory could result in disturbance to the area's residents given that it is a relatively suburban residential area, especially if movements are not well scheduled .
- ACCIDENTS: similar to the installation phase risks.

❖ **Mitigation Measures (Installation & Operational Phases):**

- MAINTENANCE: Ensure that vehicles are continuously maintained in accordance with the manufacturer's recommendations. And a maintenance log for vehicles as well to be established.
- DRIVING PRACTICES: Apply strict measures on safe driving practices, signaling, fastening safety belts, and adhering to speed limits.

- Limit the speed of vehicles to 20km/hr. when entering the residential area leading to the site.
- **MOVEMENT SCHEDULES:** Set a movement schedule that all vehicles should adhere to, avoiding rush hours and nighttime.
- **COVERING AND SECURING LOADS:** Ensure that all vehicles are covered upon departure to avoid any falling debris or material from finishing works, and in operations ensure that all vehicles' loads are fastened and secured.
- **REVERSING ALARMS:** ensure that all heavy vehicles are equipped with reversing alarms.
- **LOADING/UNLOADING PROTOCOLS:** Establish safe protocols for loading and unloading activities, ensuring that they occur in designated areas away from general traffic.
  - ensure that the company shall dedicate specific areas for loading and unloading that are clearly marked and no parking should be allowed around it.

❖ **Significance:**

The impacts relevant to traffic and vehicular movement during the both the installation and operational phase extend beyond the physical boundaries of WPI site. While any related incidents could pose moderate severity, their likelihood of occurrence are low, as well as being short-term in duration. Hence, the significance of traffic impacts for both phases is assessed as low.

## 6.6. Visual Impacts

❖ **Risks:**

**I- Installation Phase:**

- **VISUAL VALUE:** poor craftsmanship in painting, un-organized installation of new machinery and equipment, and leaving equipment and material stored outside or in a random manner pose negative aesthetical value to the facility.
- **ACCUMULATION OF WASTE:** improper housekeeping and accumulation of packaging waste, debris, and cardboard, on the site or outside the building could affect the overall aesthetical value of the area.
- **RELOCATION OF STORAGE STOCK:** relocating the stock into the new building could pose visual impacts if the stock is not moved strategically, resulting in leaving products laying outside in an un-organized manner until moved into the new building.

**II- Operational Phase:**

- **MAINTENANCE OF PAINT AND FACILITIES:** lack of maintenance of the building, including usual wear and tear, environmental factors that could damage the paint, or acts of vandalism, could lead to loss of aesthetical value.
- **ACCUMULATION OF WASTE:** waste could be left accumulating in open spaces around the facility, especially packaging waste like cardboard, nylon, and defected products.

❖ **Mitigation Measures (Installation & Operational Phases):**

- **HOUSEKEEPING:** Continuous and daily housekeeping of site during all project phases.
  - Remove unused equipment and machinery and store them in their designated location.
  - Waste to be collected in their designated containers, no open laying waste should be left on site.
  - Organize the raw material in the storage hanger over the racks and do not leave raw material sacks on the floor.
- **MAINTENANCE:** Continuous maintenance of paint and facilities.

- **LANDSCAPING:** The company has existing green areas and a park within the facility. These should be maintained to keep the positive aesthetical value of the area.

❖ **Significance:**

Impacts on visual and aesthetical values are expected to be low, local, long-term. The only outdoor physical alteration will be relevant to the new building's establishment. Hence, the risks are noted as low in significance. During operations, if the mitigation measures are properly implemented and the factory is appropriately designed, it is expected to bring overall low but positive significance to the aesthetical value of the area.

## 6.7. Solid Waste

### I- Installation Phase:

❖ **Risks:**

- **DISPOSAL OF FINISHING WORKS & INSTALLATION WASTE:** although the associated civil works with the new building are limited to finishing works and are narrow in area and scope, any resulting waste from faulty material, scrap from the preparation of the previous storage area to house the thermoforming production line, or other construction waste could be disposed of along with municipal solid waste.
- **IMPROPER DISPOSAL:** Finishing works contractor and suppliers may dispose of waste in open random areas rather than disposing of them into designated landfills.

❖ **Mitigation Measures:**

- **WASTE COLLECTION:** Contractors and suppliers are to collect construction and installation waste in special containers, segregated from municipal waste, and to dispose of them in designated landfills.
  - o Waste management commitments and clauses should be included in bidding documents.

❖ **Significance:**

The impacts relevant to solid waste generation and management during the installation phase could extend beyond the factory premises if poor disposal measures are implemented. Nevertheless, considering the low probability and severity of potential impacts, coupled with the short-term nature of operations, the significance of solid waste risks during the installation phase is rated as low. Nevertheless, with the high potential for mitigation through established control measures, the residual risk can be managed, mitigated, and its significance can be lowered.

### II- Operational Phase:

❖ **Risks:**

- **PRODUCTION WASTE AND DEFECTS:** While thermoforming promises to lower defects and enhance production efficiency, defects could still occur. Yet, despite that defected products are typically shredded and reintroduced to the process, not all can be reused. Hence there is still amounts of defected products that become solid waste.
- **PACKAGING WASTE:** The company's packaging waste comprises of defected or waste nylon wrapping, where they did not report having cartons or cardboard being defected in the packaging process.

- **MIXING DIFFERENT TYPES OF WASTE:** WPI has obtained ISO 14001, and implements waste segregation for municipal waste. Additionally, the company segregates process waste (i.e., nylon waste, defect products, and waste cartons). Nevertheless, their final disposal needs to be ensured to correspond to each type and that they are not mixed when transported for final disposal.

❖ **Mitigation Measures:**

- **PRODUCTION WASTE REDUCTION:** Implement lean manufacturing techniques to minimize production defects. Conduct regular quality checks to identify and rectify process inefficiencies that lead to waste. For waste that cannot be reintroduced into the process, the company shall continue engaging with farmers and livestock breeders to provide them with it for reuse. If the quantities are substantially larger than what is needed by these parties, the company shall explore partnerships with hand-craft and reuse organizations and NGOs to provide them with the products.
- **PACKAGING WASTE MANAGEMENT:** Establish a reduction program targeting packaging waste. Engage in material recovery programs for nylon wrapping and explore the possibility of recycling, and reuse through providing it to interested parties such as farmers and livestock breeders.
- **WASTE SEGREGATION ENFORCEMENT:** Reinforce waste segregation practices to prevent the mixing of different types of waste, expand the waste segregation and storage practices as implemented for municipal waste to process waste.
  - Provide adequate numbers of containers and bins for different waste types so that no waste is left collected on the ground.
  - Provide clear labeling and separate bins for each process waste type and train employees on proper segregation practices.
  - Ensure that segregated waste is handled appropriately throughout the disposal process.
- **HOUSEKEEPING:** Daily housekeeping includes collection, disposal, and emptying of waste containers.
- **LIAISON:** Liaise with the municipality for the disposal of defect products and any packaging and process waste. This includes containers and collection frequency. Additionally, liaise with the municipality for the emptying of the septic tank.

❖ **Significance:**

The impacts relevant to solid waste generation and management during the operational phase could extend beyond the factory premises if poor disposal measures are implemented. Nevertheless, considering the low probability and severity of potential impacts, the significance of solid waste risks during the installation phase is rated as low despite it being long-term in duration. Nevertheless, with the high potential for mitigation through established control measures, the residual risk can be managed, mitigated, and its significance can be lowered.

## 6.8. Hazardous Material and Waste

### I- Installation Phase:

Hazardous material and their subsequent waste generation is expected to be negligible during finishing works and installation of the new thermoforming line.

### II- Operational Phase;

❖ **Risks:**

**STORAGE OF OILS AND LUBRICANTS:** oils and lubricants are needed for the maintenance of the production lines at WPI factory, including the new thermoforming machine. The frequency of lubrication depends on the machine and technology and could span from around every other day, to weekly, and for some longer than that. Despite the lubrication quantities are very small for each machine, the high number of production lines at WPI requires quantities of lubricants to be stored on site.

- **SPILLS AND LEAKS:** The risk of accidental spills or leaks of oils and lubricants during storage, handling, or transportation within the facility can lead to health risks. Risks to soil and water are negligible as the storage and transport takes place within the facility on paved and built-up areas.
- **EMPTY CONTAINERS AND BARRELS OF OILS AND LUBRICANTS:** empty containers shall be clearly labelled and stored in designated location. Their disposal shall be in liaison with the municipality to ensure their appropriate transport and disposal into authorized locations.
- **MAINTENANCE WASTE:** Regular maintenance and repairs could generate waste like used filters, oils, and worn-out parts or machinery, which may be classified as hazardous.

❖ **Mitigation Measures:**

- **STORAGE FACILITIES:** Ensure that all oils and lubricants are stored in their allocated storage area and that they are returned to their location once used and immediately.
- **LABELING:** Clearly label all containers with the type of chemical, its hazards, and handling instructions.
- **SAFETY DATA SHEETS (SDS):** Maintain up-to-date SDS for all chemicals on-site and ensure they are accessible to all employees.
- **SAFE DISPOSAL:** ensure that all maintenance waste is collected in a designated location, is clearly labelled, and is transported and disposed in line with the instructions and through liaison with the municipality.
- **OCCUPATIONAL HEALTH AND SAFETY:** Workers shall be provided with full protection PPEs, including gowns, industrial gloves, industrial scale masks, goggles, and other as appropriate according to manufacturer specifications.

❖ **Significance**

The impacts relevant to hazardous material management and hazardous waste generation and management during the operational phase are limited to the factory site. Considering the low probability yet moderate severity of potential impacts, the significance of hazardous material and waste risks during the operational phase is rated as low as it is also short-termed in duration. Nevertheless, with the high potential for mitigation through established control measures, the residual risk can be managed, mitigated, and its significance can be lowered.

## 6.9. Labor Rights

### I- Installation Phase:

❖ **Risks:**

- **NONCOMPLIANCE TO LABOR RIGHTS:** The PLL clearly defines working hours, leaves, wages, and benefits as well as Act No.4 of 2021 which is the latest decree setting the minimum wage limits in the Palestinian Territories. Nevertheless, the PLL and its suite of supporting decrees face enforcement challenges. Wages are often below the minimum requirements, especially

when contractors and subcontractors are involved. Workers are not provided with their contracts, overtime compensation, and other rights.

- **CHILD LABOR:** Child labor is common especially at smaller towns and suburban areas. Construction activities are classified as hazardous work and children under the age of 18 per the PLL are not permitted to partake in such a work environment. As such there is a risk that the contractors, or subcontractors if involved, are hiring children under the age of 18.
- **INSURANCE:** a potential risk is workers on site without a valid injury insurance policy in accordance with the PLL.
- **GRIEVANCES:** During the different phases of project implementation concerns, complaints, and grievances are expected to arise among project workers. Such grievances are relevant to their labor rights and working conditions. The lack of an effective and transparent mechanism to voice such grievances and guarantee their review for resolution is an associated risk. Additional risks entailed include coercion and risks of retribution towards workers when they voice their grievances.

#### ❖ **Mitigation Measures:**

- **CONTRACTUAL OBLIGATIONS:** Ensure that all contracts with contractors explicitly state the need to adhere to labor laws, including wage requirements, working hours, and benefits.
  - Contractors are to submit their workers' contracts to the employer to ensure appropriate labor rights are included in the PLL. The contracts will include the workers' ID numbers which will allow the employer to check the ages of the workers.
  - Adherence to minimum wage act should be ensured during monitoring of contractors.
- **CHILD LABOR:** If any child labor is suspected on site, the employer will verify and immediately report it to the Ministry of Labor. The PLL contains penalty clauses on businesses reported to employ children as defined by the law, the Ministry of Labor has the legal authority to fine businesses depending on the case, and the Minister of Labor if such incidents frequent, has the authority to close such establishments.
  - Implement strict age verification processes during hiring to ensure no underage workers are employed.
- **EMPLOYMENT:** Ensure that the employment of workers is conducted based on merit and skills required only without bias towards social, gender, or socio-economic considerations.
- **WORKERS' GRIEVANCE MECHANISM:** Contractors shall develop a Workers' Grievance Mechanism with appropriate uptake channels with supervision from the project owner and in accordance with the Project's Workers' GM. The Contractor's Workers' GM shall contain effective uptake channels and clearly defined resolution and review timelines with monthly reporting to be provided to the project owner.
- **MANDATORY INSURANCE:** Make it mandatory for contractors to provide valid injury insurance policies for all workers before commencing work.
  - Regularly verify the validity of insurance policies and ensure they are in line with the PLL.

#### ❖ **Significance**

The impacts on labor rights during the installation phase cannot be completely avoided but their probability and severity can be minimized with the application of the relevant mitigation measures. In this phase, the probability of such risks materializing as well as their severity are moderate, yet their duration is short-termed. Nevertheless, the significance of this risk during the installation phase is moderate.

## II- Operational Phase:

### ❖ Risks:

- LABOR RIGHTS: company's staff at the moment comprises of around 250 workers. The company estimates that the expansion project will result in the addition of 80 new direct workers. Risks associated with this employment include not providing workers with contracts that contain a clear description of their rights and duties that are in line with the PLL.
  - o COMPENSATION: Additional risks include uncompensated overtime and delayed wages.
- WORKPLACE INSURANCES: During the E&S audit, the existing policies had covered only 90 workers, this has been raised as part of the CAP and has been amended to include the 250 workers. Yet there is a risk that the policy will not be updated to include the new workers under the expansion project.
- GRIEVANCES: The lack of a functional grievance mechanism and complaints uptake channels carry a risk of workers' concerns not being conveyed to management.
- WORKERS' E&S CAPACITY: The lack of knowledge among workers of their duties, responsibilities, rights and ability to report grievances can lead to issues unresolved and workers with poor knowledge of the mitigation measures that protect their labor rights, environment, and workplace.
- EXCLUSION OF SOME VULNERABLE AND MARGINALIZED GROUPS FROM EMPLOYMENT: The factory should have unbiased recruitment procedures that are merit based only, recruitment should not factor race, sex, ethnicity, religion or any other socio-economic criteria into the selection process. While the company's workforce consists of around 70% females, the company should ensure that their policy is not resulting in exclusion of other vulnerable and marginalized groups from employment.

### ❖ Mitigation Measures:

- CLEAR EMPLOYMENT CONTRACTS: Ensure that every worker, regardless of their position, is provided with a clear and comprehensive employment contract that outlines their rights, duties, compensation, working hours, and other essential terms.
- CODE OF CONDUCT: Implement and adopt the Code of Conduct (CoC) as available in Annex I. The CoC contains a demarcation of labor rights, responsibilities and GBV related measures that are further discussed below. The code of conduct to be used for this project is the one recommended by the F4JII, available in the F4JII Project ESMF<sup>24</sup>.
- TRAINING: The Project Workers shall receive an E&S orientation training prior to the commencement of the operations phase, covering the CoC, GM, OHS, ERP, Waste management, and the ESMP overall.
- ADHERENCE TO MINIMUM WAGE ACT: While the company has been audited and has been noted to adhere to the minimum wage act. Still, regular Monitoring shall be conducted especially for the new hires under the expansion project to review the wages being paid to ensure they meet the minimum wage requirements set by the Palestinian Authority.
- MANDATORY INSURANCE: All workers must be provided with contractual documentation and are to be covered by a valid occupational health insurance policy.
- WORKERS' GRIEVANCE MECHANISM (GM): A workers' Grievance Mechanism shall be established in accordance with Annex II. Uptake channels shall be disseminated to workers and should be effective and accessible.

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<sup>24</sup> [https://www.f4j.ps/cached\\_uploads/download/2021/01/17/environmental-and-social-management-framework-1610875245.pdf](https://www.f4j.ps/cached_uploads/download/2021/01/17/environmental-and-social-management-framework-1610875245.pdf)

- **RECRUITMENT AND EMPLOYMENT:** Recruitment shall be conducted in a transparent manner including issuing announcements for vacancies, reviewing applications based on merit and qualifications, and documenting scores provided for each applicant for later review shall audits be required or if grievances were received through the company's GM.

❖ **Significance:**

WPI possess strong institutional set up and capacity to manage their labor force. The probability of labor related risks in the operational phase are expected to be moderate yet their severity is expected to be low especially that measures are to be in place to resolve any labor related grievance. Additionally, impacts are expected to be short in duration and hence labor related impacts during the operational phase are of low significance.

## 6.10. Occupational Health and Safety

### I- Installation Phase:

❖ **Risks:**

- **OCCUPATIONAL HEALTH AND SAFETY:** The installation phase despite having a simple nature relating to finishing works of the new building and installation of the new production line and machinery still carries risks relevant to OHS. Workers may face physical risks from interacting with new machinery and installation equipment, which could lead to injuries from heavy lifting or accidents involving moving parts. Electrical installations elevate the risk of shocks or burns, while the overall construction atmosphere could increase the incidence of slips, trips, and falls. Moreover, a lapse in enforcing or adhering to PPE protocols can significantly heighten the likelihood of these risks leading to actual harm.
- **CAPACITY AND AWARENESS:** Lack of compliance to OHS procedures and lack of adequate capacity among contractors and their workers could lead to incidents and injuries in the work place.
- **PERSONAL PROTECTIVE EQUIPMENT (PPEs):** The lack of commitment and adherence to the use of PPEs. Additionally, contractors may not provide their workers with sufficient or adequate PPEs.

❖ **Mitigation Measures:**

- **COMPLIANCE TO PPE USE:** Inspections will be conducted to ensure adequate quantities and conditions of PPEs, as well as the inspection of commitment to their use.
- **HOUSEKEEPING:** Periodic housekeeping, removal of unused equipment, and LOTO (Log Out/Tag Out) procedures shall be implemented.
- **MACHINERY INSTALLATION AND ELECTRICAL WORKS:** For electrical works, and operating heavy and rotatory machinery, only skilled workers will be allowed on the vicinity of works.
  - Ensure that the machinery are equipped with flaps and emergency stops
- **TESTING OF NEW EQUIPMENT AND MACHINERY:** Only skilled workers shall conduct testing and commissioning works in line with the manufacturer's recommendations.
- **CAPACITY BUILDING:** Train workers on lifting and material handling during loading/unloading activities.
  - Appoint an E&S focal point from the contractors' side to follow up on OHS and working conditions aspects.
  - Conduct weekly toolbox meetings and include OHS issues.
  - The supplier shall provide an OHS training to the company workers on the thermoforming production line.

- **OHS PLAN:** The supplier shall provide an OHS plan relevant to the thermoforming production line installation and operation.
- **FIRST AID:** Provide first aid kits on the site, ensure that kits are provided in adequate number per workers and that they are always accessible, and in good condition at all times.
  - o Coordinate and locate the nearest medical facility and hospital to the site. Numbers of first aid response services shall be circulated to workers.
- **TRAFFIC SAFETY:** Clearing the site when reversing vehicles for loading/ unloading activities. As well as other mitigation measures highlighted in the traffic safety section.

❖ **Significance:**

The impacts on OHS during the installation phase cannot be completely avoided but their chances and magnitude can be minimized with the application of relevant and effective mitigation measures. While the extend of the risks do not surpass the workplace area, and their probability of occurrence is low to moderate, however their severity could be moderate given that electrical works and the associated OHS risks of physical, chemical, and electrical incidents and injuries. Hence the significance of working conditions and OHS risks during the installation phase is moderate.

## II- OPERATIONAL PHASE

❖ **Risks:**

- **OHS CAPACITY AND TRAINING:** Lack of capacity to implement the CAP and the ESMP is a risk that could hinder the effective implementation of the mitigation measures. While the company's quality engineer acts as a focal point for E&S and OHS matters. Per Law No.3 of 2019, the company based on its employees number should have an OHS committee as well as 2 specialized supervisors and one technical supervisor.
- **OCCUPATIONAL HEALTH AND SAFETY:** workers during the operational phase are susceptible to injuries during loading/unloading of raw material, heat, and chemical risks form the production process, heavy and rotatory machinery operation, slip and fall, exposure to fumes if proper mitigation is not implemented, exposure to noise beyond permissible limits and for reoccurring periods, and working environment temperatures are potential OHS physical risks.
- **FIRE RISKS:** smoking close to cardboards and packaging materials or wastes or leaving them out under direct sunlight for long periods could result in fires. Electrical incidents or malfunction of equipment could result in fires on facility.
- **LACK OF COMPLIANCE WITH NATIONAL LAWS AND PROCEDURES ON OHS:** Like Law No.3 of 2019 on OHS supervisors, MoL has a suit of regulations on OHS that are detailed in Chapter 3 which the company should adhere to.

❖ **Mitigation Measures:**

- **REGULAR E&S AUDITS AND MONITORING:** In line with ISO 14001, the company shall undergo an audit prior to March 2026 to renew its environmental management system certificate. Additionally, OHS aspects and working conditions should be covered in the periodic E&S monitoring reports.
- **OHS CAPACITY BUILDING:** While the supplier is to provide WPI workers with OHS trainings. The OHS supervisor shall also conduct continuous OHS trainings and awareness to workers, which is part of the role of the OHS supervisors in line with Law. No 3 of 2019. This includes regular OHS training sessions, drills, and awareness campaigns to maintain high safety standards.

- Provide proper training on material handling, operation of the new machinery and production lines, and the use personal protective equipment (PPE).
- **OHS RISK ASSESSMENT:** Implement a thorough risk assessment process to identify potential hazards associated with loading/unloading, machinery operation, and chemical handling and other operational processes.
- **OHS CONTROL MEASURES:** Ensure effective control measures are in place, such as engineering controls, administrative controls, and the use of personal protective equipment (PPE).
- **MEDICAL EXAMINATIONS:** in line with Decision of Council of Ministers No. (22) of 2003 on Initial medical examinations of workers and Decision of Council of Ministers No. (24) of 2003 on conducting periodic medical checkups for workers, workers in the plastics industry, as it is categorized in relevance to medical checkups a non-hazardous industry, are to undergo medical checkups every two years.
  - The company shall establish a long of medical checkups for their workers and this log is to be examined during monitoring visits.
- **PPES COMPLIANCE:** Provide workers with masks, gloves, boots, gowns, hairnets, earmuffs, goggles, and other PPEs as appropriate.
- **WORKPLACE SAFETY:** Ensure floors are non-slip, regularly cleaned, and free from obstacles. Place warning signs in wet areas.
  - Ensure proper ventilation and HVAC in areas where dust or fumes might accumulate and where temperature build ups from production processes might arise.
  - Provide cooling or heating systems as necessary, and allow regular breaks for workers in extreme temperature areas.
  - Set up warning signs near electrical connections, rotating and heavy machinery, noise generating equipment, face masks signs, and others as appropriate.
  - Ensure that workers adhere to the designated smoking area.
  - Equip the facility with fire detectors, alarm systems and firefighting equipment.
- **MAINTENANCE:** establish a maintenance log for all systems, including HVAC, filters, and machinery and equipment to avoid any OHS incidents resulting from faults.
  - Maintain monitoring and detection systems including firefighting equipment, sensors, temperature meters, and others.
- **OHS PLAN:** The supplier shall provide an OHS plan relevant to the thermoforming production line installation and operation.
  - The Company shall implement the Emergency Response Procedures (ERP) that is to be included in the OHS plan
  - A suggested general OHS Plan template and Emergency Response Procedures is available through the following link : [OHS Plan and ERP Template](#).
- **HOUSEKEEPING:** Periodic housekeeping, turn of idle equipment and machinery that are not being used.
- **SKILLED WORK:** only skilled workers will be allowed on the vicinity of works relating to operating heavy and rotatory machinery, electrical works, maintenance, and other processes requiring specialized skills.
- **FIRST AID:** Provide first aid kits on the site, ensure that kits are provided in adequate number per workers and that they are always accessible, and in good condition at all times.
  - Coordinate and locate the nearest medical facility and hospital to the site. Numbers of first aid response services shall be circulated to workers.
- **TRAFFIC SAFETY:** Clearing the site when reversing vehicles for loading/ unloading activities.
  - Implement the mitigation measures relevant to accidents and traffic safety as detailed in the traffic safety section.

❖ **Significance:**

The impacts relevant to working conditions and OHS during the operational phase are limited to the factory site. Considering the low probability yet moderate severity of potential impacts, the significance of the associated risks is rated as moderate as any impacts are also short-termed in duration.

### 6.11. Life and Fire Safety

Fire hazards and risks are most prevalent during the operational phase of the project. However, there are associated risks especially during electrical works, connections of services and new production lines. Mitigation measures are similar in both phases of the project, they are described collectively herein.

#### ❖ Risks:

- ELECTRICAL CONNECTIONS AND INSTALLATION OF NEW PRODUCTION LINES: these installations include connection works and services. Leaving wires exposed, or inadequate load connections could be a source fire hazard.
- MACHINERY OVERHEATING/MALFUNCTIONS: inadequate use of machinery beyond working limits per manufacturer specifications or lack of maintenance could lead to overheating or faults leading to potential fires.
- SMOKING NEAR STORAGE AND WASTE COLLECTION AREAS: especially packaging waste which consist of cardboard and nylon wrapping that could be a fire hazard.
- ACCUMULATION OF PACKAGING WASTE: The accumulation of waste, especially packaging, plastics, or carton under the sun for long time could constitute a fire hazard.
- POLYMERIC DUST: Granulators produce fine dust that is often combustible. If suspended in air in high concentrations it could ignite. High concentration of polymeric dusts may be generated close to the granulator when foamed rigid plastics are treated, and whenever coarse and fine granules are mechanically separated by sieving. Fine powders may accumulate on vertical walls, as well as on horizontal surfaces beyond the reach of conventional housekeeping. Although some polymeric dust is always formed, this becomes a hazard only if the materials are rigid.

#### ❖ Mitigation Measures:

- MONITORING: Employ temperature measurement and control measures, including appropriate ventilation and installation of HVAC system to avoid hot working environments and overheating of machinery.
  - o Implement maintenance tests for fire alarms and sprinklers annually at minimum or per the civil defense instructions.
- WORKPLACE SAFETY: maintain firefighting alarms, smoke detectors, and extinguishers in accordance with civil defense instructions.
  - o Prohibit smoking in storage areas and on facility, dedicate a specific smoking area away from waste collection and raw material storage areas.
  - o Implement sound and daily housekeeping practices, collect waste packaging and others in designated containers, and liaise with municipality for daily collection of waste.
- WORKPLACE DESIGN: Ensure that near granulators and shredders the flooring and walls are non-stick to minimize the amount of dust that could settle.
- HOUSEKEEPING: Ensure daily and adequate housekeeping to remove and decrease the amount of accumulated dust and waste.

#### ❖ Significance

Fire risks after the implementation of the mitigation are restricted spatially to the site location only. Despite any fire incidents being accidental, the risks are but of low probability and short duration.

## 6.12. Community Health and Safety

### I- Installation Phase:

As the works are confined within the factory's premises, impacts on community's health and safety are expected to be negligible to low. Yet important aspects such as community engagement, and the implementation of the ESMP and its measures will mitigate any residual impacts on community health and safety.

#### ❖ Risks:

- PUBLIC ENGAGEMENT: Weak participation of the public, women and vulnerable groups in planning and identifying project impacts on their health and life.
- NUISANCE AND WASTE: Transferring of raw material, debris and machinery through increased traffic of vehicles and trucks may cause nuisance and disturbance to neighboring areas. Additionally, the random disposal of installation and finishing works waste could cause nuisance and environmental pollution in adjacent areas. Noise from working beyond designated hours or operating unmaintained machinery could cause increased levels of noise.

#### ❖ Mitigation Measures:

- STAKEHOLDER ENGAGEMENT: Ensure adequate stakeholder engagement and community awareness regarding the project. The outcome, concerns, and recommendations of the consultation activities shall be documented and reviewed to include in the project's operations.
- GRIEVANCE MECHANISM: Establish an open communication channel with the public to lodge their concerns and complaints.
- HEALTH AND SAFETY: Employ mitigation measures stated for air quality, noise, waste, traffic, and other parameters as identified in this ESMP.

#### ❖ Significance

The impacts on community health and safety during the installation phase are of short-term duration, low probability, and low severity. Hence the significance of these risks is assessed as low.

### II- Operational Phase:

During operations, risks to community health and safety are limited to the following;

#### ❖ Risks:

- VISITORS HEALTH AND SAFETY: factory visitors who are unaware of the nature of the operation could phase various risks as aforementioned. The company does not let unaccompanied visitors enter and have wash stations for sanitizations, hairnets, and boot covers for visitors.
- DISCONTINUED STAKEHOLDER ENGAGEMENT: Stakeholder engagement activities should be continuous and project stakeholders should be continuously engaged with.

- **GRIEVANCES:** the unavailability of a grievance mechanism prevents the company from engaging with the public and resolving any concerns and complaints resulting from their operations.

❖ **Mitigation Measures:**

- **VISITORS' HEALTH AND SAFTY:** Before allowing visitors into operational areas, provide a brief orientation on the mitigation and protective measures.
- **SIGNAGE:** Place clear warning signs near machinery and other hazardous areas.
- **RESTRICTED AREAS:** Designate certain high-risk areas as off-limits to visitors.
  - Ensure that access to the production lines is limited to qualified workers.
- **GRIEVANCE MECHANISM:** Establish a grievance mechanism for the public in accordance with Annex II.

❖ **Significance**

The impacts on community health and safety during the operational phase have negligible to low probability, low severity, and are short-term in nature. Hence the significance of the risks are negligible to low.

### 6.13. Gender Based Violence

#### I- Installation Phase:

❖ **Risks:**

- **GENDER BASED VIOLENCE (GBV); SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARASSMENT (SH) RISKS TO THE CURRENT FEMALE WORKERS:** as the company's workforce currently comprises around 70% females, contracted and short-term labor on site might result on GBV risks to the female workforce.
- **PREJUDICE AGAINST WOMEN WORKING IN CONSTRUCITON SITES:** Women being excluded due to gender, socio-economic, and general social considerations can be expected especially in the construction sector.

❖ **Mitigation Measures:**

- **GBV GRIEVANCES REFERAL MECHANISM:** The workers' GM should include measures for GBV referral.
- **CODE OF CONDUCT:** Ensure that code of conduct is circulated to all contracted project workers and that it is covered within their training. Workers must read and sign the Code of Conduct. The CoC contains the required conduct expected from workers, their rights, occupational health and safety requirements, reporting, GBV prevention, and penalties in cases of breaching the CoC.
- **EMPLOYMENT:** Measures stated in the labor rights in terms of employment must be adhered to.
- **CAPACITY BUILDING:** The E&S orientation session should cover GBV prevention.

❖ **Significance**

Impacts relevant to GBV (SEA /SH) during the installation phase have low probability, yet moderate to substantial severity. Nevertheless, as the installation and finishing works are confined in specific areas and the processes are short-termed, the significance of this risk during the installation phase is low.

## II- Operational Phase:

With the factory currently employing around 250 employees, over 50% of whom are women. And as 80 new jobs are expected, with at least 50% of new employment being women, the following risks could be present;

### ❖ Risks:

- GENDER BASED / SEXUAL EXPLOITATION AND ABUSE: women workers may be exploited or abused in the workplace. The abuse could take multiple forms either in their labor rights, being paid less than their male counterparts as well as the risk of sexual exploitation and abuse.
- EXCLUSION: Women could be excluded from promotions, workplace development, and having leading roles in their workplace.
- SEXUAL HARASSMENT: Women in the workplace are subject to risks of sexual harassment and the lack of mitigation measures and institutionalized capacity and knowledge could amplify these risks.

### ❖ Mitigation Measures:

- EMPLOYMENT AND ADMINISTRATIVE MANAGEMENT: employment, promotions, raises, and other administrative procedures should be based on merit and qualifications, any other considerations such as gender, socio-economic status, religion, race, and other social factors should not impact the employment and evaluation process.
- CODE OF CONDUCT: Implement the code of conduct as specified in the ESMF of the F4J II project and the project specific code of conduct available in Annex I. The code of conduct contains specific clauses on the prevention of GBV (SEA/SH).
- CAPACITY BUILDING AND TRAINING: Include the Code of Conduct provisions and mitigation measures for GBV in the trainings provided to the workers. The training provided shall cover GBV topics, basic definitions and literacy, and prevention and reporting.
- GRIEVANCE MECHANISM: Provide an open grievance mechanism and provide an overview about it as a focus session to the women working in the company.
  - o The Workers' and Public GMs shall include specific measures for reporting and referral of grievances related to GBV (SEA / SH).

### ❖ Significance

Impacts relevant to GBV (SEA /SH) during the operational phase have low probability, yet moderate to substantial severity. As the operational phase is long-term, the significance of this risk during the operational phase is moderate.

## 6.14. Summary of Environmental and Social Risks

Table 3: Summary of Environmental and Social Risks

Parameter	Project Phase	Timescale	Significance
Air Quality	INSTALLATION	Short-term	Negative, Low
	OPERATION	Long-term	Negative, moderate
Noise	INSTALLATION	Short-term	Negative, low
	OPERATION	Long-term	Negative, moderate
Traffic and Vehicular Movements	INSTALLATION	Short-term	Negative, low
	OPERATION	Short-term	Negative, low
Visual Impacts	INSTALLATION	Short-term	Negative, low
	OPERATION	Long-term	Positive, low
Solid Waste	INSTALLATION	Short-term	Negative, low
	OPERATION	Long-term	Negative, low
Hazardous Material and Waste	INSTALLATION	Short-term	Negative, low
	OPERATION	Long-term	Negative, low
Labor Rights	INSTALLATION	Short-term	Negative, moderate
	OPERATION	Long-term	Negative, low
OHS	INSTALLATION	Short-term	Negative, moderate
	OPERATION	Long-term	Negative, moderate
Life and Fire Safety	INSTALLATION	Short-term	Negative, low
	OPERATION	Long-term	Negative, low
Community Health and Safety	INSTALLATION	Short-term	Negative, low
	OPERATION	Long-term	Negative, Negligible to low
Gender Based Violence	INSTALLATION	Short-term	Negative, low
	OPERATION	Long-term	Negative, moderate

## 7. Environmental and Social Management Matrix

The Environmental and Social Management matrix defines all parameters of risk that might be impacted by the project's different phases. It summarizes the identified potential impacts, and their corresponding mitigation measures, establishing the monitoring activities and requirements to ensure adequate and sound implementation of the mitigation measures, in a clearly written manner and reasonable implementation requirements so that WPI could implement those actions on the ground. To ensure that its cost requirements are known, the matrix provides budgetary requirements for the implementation of each action so the company can be informed of associated cost and prepare their budget once implementation commences, this additionally provides the contractors with the necessary overview to prepare their costing and bids.

As such, this matrix aims to;

- I- Ensure that the prediction for the impacts is accurate.
- II- Ensure that the mitigation measures are effective and that their implementation can be monitored.
- III- Provide cost estimates for each action.

The monitoring plan includes the monitoring activities (How?), the responsible party for monitoring (Who?), and the frequency of monitoring (How many?). The ESMP is designed to cover the different phases of the project. The generated ESMP matrix is mainly built upon national legislations, O.P 4.01, General and Industry-specific EHSs, and based on the findings of the data collection and impact assessment processes for this assignment.

This matrix is intended to be a dynamic tool, meaning that its update will be required as the project's implementation is initiated and the monitoring commences. Parameters may have to be modified, or new risks and impacts could be identified throughout the implementation.





S Category	Parameters And Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
<b>Planning and Procurement Phase</b>							
Institutional Capacity	<b>Institutional Capacity</b>	<ul style="list-style-type: none"> <li>➤ in line with Law No.3 of 2019 on Industrial Facilities OHS Supervisors and Committees, the company is required to have 1 technical supervisor in addition to 2 specialized supervisors</li> <li>➤ The Company shall hire the OHS supervisors as well as establishing the OHS committee no later than by the end of Q1 2024.</li> <li>➤ WPI To send a commitment letter or email to DAI on its willingness and commitment to implement the CAP and the ESMP no later than end of February 2024.</li> <li>➤ In terms of OHS capacity building specific to operating the thermoforming production line, the company supplying the line should provide an OHS plan as well as training to company staff, this has to be included in their responsibilities in line with Chapter8.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Training logs on OHS for the thermoforming line by the Supplier</li> <li>➤ OHS plan submitted by the supplier</li> <li>➤ Hiring of the OHS supervisors</li> <li>Forming of an OHS committee</li> </ul>	WPI Management	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ Frequency: Quarterly</li> <li>➤ MoL</li> <li>Frequency: As needed</li> </ul>	<ul style="list-style-type: none"> <li>➤ Formation of an OHS Committee</li> <li>➤ Hiring of the OHS Supervisors</li> <li>Successful OHS Training by the supplier with logs of training</li> </ul>	Salary of OHS supervisor is expected to be around 1200 – 2000\$.
Licensing	<b>Licensing and Permits</b>	<ul style="list-style-type: none"> <li>➤ The company shall coordinate with MoNE, EQA, and MoH regarding their requirements for the project.</li> <li>➤ The company shall apply to MoNE for an expansion project license and coordinate to ensure meeting licensing requirements by MoNE who in turn contact EQA and MoH and other ministries per their intra-governmental procedures for any additional permits / approvals.</li> </ul> <p style="margin-left: 20px;">Liaise with the Municipality and HEPCO on services and utility provisions to ensure that the new expansion does not impact their capacities.</p>	<ul style="list-style-type: none"> <li>➤ Official letter of application to MoNE / Official communication of no further needed requirements</li> <li>➤ Official communication with the municipality and Service providers</li> </ul>	WPI Management	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ Frequency: Once the ESMP has been approved and WPI Contacted MoNE</li> </ul>	<ul style="list-style-type: none"> <li>➤ Attainment of Expansion permission / letter of no additional requirements</li> </ul>	No additional budgetary requirements for the implementation of the indicated mitigation measures.

	<b>Thermoforming Line Specifications</b>	<ul style="list-style-type: none"> <li>➤ Include the Palestinian Noise Standards and Air Quality Requirements as part of the procurement standards and requirements.</li> </ul>	Inclusion of Standards into bidding documents	WPI Management	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ Frequency: Once at procurement process</li> </ul>	<ul style="list-style-type: none"> <li>➤ Adherence of Procured line to national standards</li> </ul>	No additional budgetary requirements for the implementation of the indicated mitigation measures.
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Table 4: Environmental and Social Management Matrix During Installation Phase

E&S Category	Parameters And Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
<b>Installation Phase</b>							
Physical Environment	<b>Air Quality / Emissions &amp; Dust</b> <ul style="list-style-type: none"> <li>➤ DUST AND EMISSIONS FROM FINISHING WORKS</li> <li>➤ INSTALLATION ACTIVITIES: USE OF SOLVENTS AND EMISSIONS</li> </ul>	<ul style="list-style-type: none"> <li>➤ DUST CONTROL DURING FINISHING WORKS: Implement dust suppression techniques such as wetting down surfaces and sealing off work areas to minimize the spread of particulate matter as needed.</li> <li>➤ USE OF LOW-VOC MATERIALS: Select and utilize low-VOC paints, adhesives, and solvents during installation activities to reduce the emission of volatile organic compounds.</li> <li>➤ FUME MANAGEMENT DURING EQUIPMENT SETUP: Ensure that the premises for the thermoforming machine and expansion project include local exhaust ventilation (LEV) systems that are installed and functioning during welding and cutting to capture fumes at the source, and ensure that areas are well-ventilated.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Document any air quality concerns by site supervisors</li> <li>➤ Document any grievances received on air quality matters</li> <li>➤ Site monitoring visits</li> </ul>	Contractor	<ul style="list-style-type: none"> <li>➤ WPI</li> <li>➤ Frequency: Daily</li> </ul>	<ul style="list-style-type: none"> <li>➤ Complaints recorded reflect appropriate mitigation measures implemented</li> <li>➤ Maintenance records of HVAC and LEV systems</li> </ul>	Installation of HVAC, and fume extraction systems would potentially cost between 2500\$ - 5000\$ per production line. A centralized one for the production area of ±30 production lines would be estimated to cost 75,000\$ - 150,000\$.  <i>*This is a rough estimate by the consultant based on literature review and</i>

E&S Category	Parameters And Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
							<i>customized engineering solutions should be priced by the company based on air quality test results and machinery specifications.</i>
	<p><b>Nuisance (Noise / Vibration)</b></p> <ul style="list-style-type: none"> <li>➤ DRILLING, CUTTING &amp; FINISHING WORKS</li> <li>➤ NOISE FROM MOVING TRUCKS</li> <li>➤ NOISE FROM MOVING STORAGE AREA TO THE NEW BUILDING</li> <li>➤ WORKING PAST DESIGNATED HOURS</li> <li>➤ PROCUREMENT OF HIGH NOISE EQUIPMENT AND MACHINERY</li> </ul>	<ul style="list-style-type: none"> <li>➤ <b>ACTIVITY SCHEDULING:</b> Restrict drilling and other noise generating activities to daytime only.                             <ul style="list-style-type: none"> <li>○ Ensure that heavy machinery or any noise producing activities are prohibited after 8 PM till 7AM and all-day during Fridays and any public and local holiday, unless an approval has been obtained by the local authorities.</li> <li>○ Keep close coordination with the municipality, neighbors, and other stakeholders. Inform them of the expected working schedule and sources of nuisance during stakeholder engagement activities.</li> </ul> </li> <li>➤ <b>OCCUPATIONAL HEALTH AND SAFETY:</b> Provide workers with high performance earmuffs or earplugs as needed and depending on the noise level and activity.</li> <li>➤ <b>NOISE LEVEL MANAGEMENT:</b> Ensure that noise levels do not exceed the recommended guidelines. Levels should not exceed the Ministry of Labor's Decision No. 4 of 2005 on Safe Levels of Noise Exposure in the Workplace.</li> <li>➤ <b>MACHINERY AND VEHICLES MAINTENANCE:</b> Ensure that the machinery and vehicles are well-maintained.</li> <li>➤ <b>MACHINERY SELECTION:</b> Ensure procurement specifications include noise level requirements compliant with GIIP and national standards.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Use noise level measurement instruments, taking readings when operating any noise producing machinery or equipment</li> <li>➤ Record each reading with date, location, time, and source of noise</li> <li>➤ Site monitoring visits</li> </ul>	<ul style="list-style-type: none"> <li>➤ Contractor</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> <li>➤ Frequency: Daily</li> </ul>	<ul style="list-style-type: none"> <li>➤ Noise levels log do not display patterns of exceeding the recommended guidelines</li> <li>➤ Complaints matrix show resolution of any complaints received</li> </ul>	<ul style="list-style-type: none"> <li>➤ Cost of noise measurement equipment (Sound Level Meter): 100\$</li> <li>➤ Maintenance should not carry any additional cost and must be included in the contractor's budget</li> </ul>
	<p><b>Traffic And Vehicular Movements</b></p>	<ul style="list-style-type: none"> <li>➤ <b>MAINTENANCE:</b> Ensure that vehicles are continuously maintained in accordance with the manufacturer's recommendations. And a maintenance log for vehicles as well to be established.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Travel logs with date and time records</li> </ul>	<ul style="list-style-type: none"> <li>➤ Contractor</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> <li>➤ Frequency: for maintenance according to manufacturer</li> </ul>	<ul style="list-style-type: none"> <li>➤ Accident-free construction activities</li> <li>➤ No near miss situations reported</li> </ul>	<p>No additional budgetary requirements for the implementation of the</p>

E&S Category	Parameters And Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
	<ul style="list-style-type: none"> <li>➤ MOVEMENT OF CONSTRUCTION VEHICLES &amp; WASTE TRUCKS</li> <li>➤ ACCIDENTS</li> </ul>	<ul style="list-style-type: none"> <li>➤ DRIVING PRACTICES: Apply strict measures on safe driving practices, signaling, fastening safety belts, and adhering to speed limits.                             <ul style="list-style-type: none"> <li>○ Limit the speed of vehicles to 20km/hr. when entering the residential area leading to the site.</li> </ul> </li> <li>➤ MOVEMENT SCHEDULES: Set a movement schedule that all vehicles should adhere to, avoiding rush hours and nighttime.</li> <li>➤ COVERING AND SECURING LOADS: Ensure that all vehicles are covered upon departure to avoid any falling debris or material from finishing works.</li> <li>➤ REVERSING ALARMS: ensure that all heavy vehicles are equipped with reversing alarms.</li> <li>➤ LOADING/UNLOADING PROTOCOLS: Establish safe protocols for loading and unloading activities, ensuring that they occur in designated areas away from general traffic.                             <ul style="list-style-type: none"> <li>○ ensure that the company shall dedicate specific areas for loading and unloading that are clearly marked and no parking should be allowed around it.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>➤ Grievances records to verify complaints resulting from speeding or unsafe practices</li> <li>➤ Maintenance logs of vehicles</li> </ul>		requirements / for movement: daily	<ul style="list-style-type: none"> <li>➤ Grievances are handled and corrective measures recorded and applied</li> </ul>	indicated mitigation measures.
	<p><b>Visual Impacts</b></p> <ul style="list-style-type: none"> <li>➤ VISUAL VALUE FROM POOR CRAFTSMANSHIP AND HOUSEKEEPING</li> <li>➤ ACCUMULATION OF WASTE</li> <li>➤ LEAVING THE STOCK OUTSIDE WHEN RELOCATING STORAGE STOCK</li> </ul>	<ul style="list-style-type: none"> <li>➤ HOUSEKEEPING: Continuous and daily housekeeping of site during all project phases.</li> <li>➤ Remove unused equipment and machinery and store them in their designated location.</li> <li>➤ Waste to be collected in their designated containers, no open laying waste should be left on site.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Daily site inspection by site supervisor</li> <li>➤ records of housekeeping</li> </ul>	<ul style="list-style-type: none"> <li>➤ Contractor</li> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI Management</li> <li>➤ Frequency: daily</li> </ul>	<ul style="list-style-type: none"> <li>➤ Complaints and grievances log indicate that any related grievances are resolved with description of the corrective actions</li> <li>➤ Overall pleasant aesthetical value of the new building and new thermoforming facilities</li> </ul>	No additional budgetary requirements for the implementation of the indicated mitigation measures.
	<p><b>Solid Waste</b></p> <ul style="list-style-type: none"> <li>➤ MIXING WASTE FROM INSTALLATION AND</li> </ul>	<ul style="list-style-type: none"> <li>➤ WASTE COLLECTION: Contractors and suppliers are to collect construction and installation waste in special containers, segregated from municipal waste, and to dispose of them in designated landfills.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Logs of landfill disposal (invoices)</li> </ul>	<ul style="list-style-type: none"> <li>➤ Contractor</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> <li>➤ Municipality</li> <li>➤ EQA</li> </ul>	<ul style="list-style-type: none"> <li>➤ No complaints are received regarding burning of waste or random disposal</li> </ul>	No additional budgetary requirements for the implementation of the

E&S Category	Parameters And Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
	<p>CIVIL WORKS WITH MUNICIPAL WASTE IMPROPPER AND RANDOM DISPOSAL</p>	<ul style="list-style-type: none"> <li>➤ Waste management commitments and clauses should be included in bidding documents.</li> <li>➤ Contractors shall develop solid waste management plan.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Grievance mechanism</li> </ul>		<ul style="list-style-type: none"> <li>➤ Frequency: Monthly</li> </ul>	<ul style="list-style-type: none"> <li>➤ Waste removed is successfully and disposed at authorized sites and logs are registered with invoices.</li> <li>➤ Contracts include relevant clauses.</li> </ul>	<p>indicated mitigation measures.</p>
	<p><b>Labor Rights</b></p> <ul style="list-style-type: none"> <li>➤ NONCOMPLIANCE TO LABOR RIGHTS</li> <li>➤ CHILD LABOR</li> <li>➤ INSURANCE</li> <li>➤ GRIEVANCES</li> </ul>	<ul style="list-style-type: none"> <li>➤ CONTRACTUAL OBLIGATIONS: Ensure that all contracts with contractors explicitly state the need to adhere to labor laws, including wage requirements, working hours, and benefits.                             <ul style="list-style-type: none"> <li>○ Contractors are to submit their workers' contracts to the employer to ensure appropriate labor rights are included in the PLL. The contracts will include the workers' ID numbers which will allow the employer to check the ages of the workers.</li> <li>○ Adherence to minimum wage act should be ensured during monitoring of contractors.</li> </ul> </li> <li>➤ CHILD LABOR: If any child labor is suspected on site, the employer will verify and immediately report it to the Ministry of Labor. The PLL contains penalty clauses on businesses reported to employ children as defined by the law, the Ministry of Labor has the legal authority to fine businesses depending on the case, and the Minister of Labor if such incidents frequent, has the authority to close such establishments.                             <ul style="list-style-type: none"> <li>○ Implement strict age verification processes during hiring to ensure no underage workers are employed.</li> </ul> </li> <li>➤ EMPLOYMENT: Ensure that the employment of workers is conducted based on merit and skills required only without bias towards social, gender, or socio-economic considerations.</li> <li>➤ WORKERS' GRIEVANCE MECHANISM: Contractors shall develop a Workers' Grievance Mechanism with appropriate uptake channels with supervision from the project owner and in accordance with the Project's Workers' GM. The Contractor's Workers' GM shall contain effective uptake channels and clearly</li> </ul>	<ul style="list-style-type: none"> <li>➤ Review and auditing of workers' contracts</li> <li>➤ Surprise visits and inspections to ensure no child labor is included.</li> <li>➤ Availability of an effective and functioning workers' GM</li> <li>➤ Contractors' insurance policies.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Contractor</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> <li>➤ MoL</li> <li>➤ MoH</li> <li>➤ Frequency: Weekly inspections of Working conditions . Surprise visits as needed.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Validation and inspection of workers' contracts and IDs to ensure adequate labor rights and no child labor on site</li> <li>➤ No near miss accidents or injuries recorded during the construction and installation works due to negligence</li> <li>➤ noncommitment to the use of PPEs has not been recorded.</li> <li>➤ Functioning and effective Workers' GM has been established.</li> <li>➤ All workers are covered by the insurance policy.</li> </ul>	<p>No additional budgetary requirements for the implementation of the indicated mitigation measures.</p>

E&S Category	Parameters And Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
		<p>defined resolution and review timelines with monthly reporting to be provided to the project owner.</p> <ul style="list-style-type: none"> <li>➤ MANDATORY INSURANCE: Make it mandatory for contractors to provide valid injury insurance policies for all workers before commencing work.                             <ul style="list-style-type: none"> <li>○ Regularly verify the validity of insurance policies and ensure they are in line with the PLL.</li> </ul> </li> </ul>					
	<p><b>Occupational Health and Safety</b></p> <ul style="list-style-type: none"> <li>➤ OCCUPATIONAL HEALTH AND SAFETY</li> <li>➤ NONCOMPLIANCE TO PPEs</li> <li>➤ CAPACITY AND AWARENESS</li> </ul>	<ul style="list-style-type: none"> <li>➤ COMPLIANCE TO PPEs USE: Inspections will be conducted to ensure commitment to PPEs.</li> <li>➤ HOUSEKEEPING: Periodic housekeeping, removal of unused equipment, and LOTO (Log Out/Tag Out) procedures shall be implemented.</li> <li>➤ MACHINERY INSTALLATION AND ELECTRICAL WORKS: For electrical works, and operating heavy and rotatory machinery, only skilled workers will be allowed on the vicinity of works.</li> <li>➤ Ensure that the machinery are equipped with flaps and emergency stops</li> <li>➤ TESTING OF NEW EQUIPMENT AND MACHINERY: Only skilled workers shall conduct testing and commissioning works in line with the manufacturer's recommendations.</li> <li>➤ CAPACITY BUILDING: Train workers on lifting and material handling during loading/ unloading activities.                             <ul style="list-style-type: none"> <li>○ Appoint an E&amp;S focal point from the contractors' side to follow up on OHS and working conditions aspects.</li> <li>○ Conduct weekly toolbox meetings and include OHS issues.</li> <li>○ The supplier shall provide an OHS training to the company workers on the thermoforming production line.</li> </ul> </li> <li>➤ OHS PLAN: The supplier shall provide an OHS plan relevant to the thermoforming production line installation and operation.</li> <li>➤ FIRST AID: Provide first aid kits on the site, ensure that kits are provided in adequate number per workers and that they are always accessible, and in good condition at all times.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Training and capacity building records, toolbox meetings</li> <li>➤ Inspection of PPEs and their conditions</li> <li>➤ Commitment of using PPEs on site</li> <li>➤ Housekeeping monitoring</li> <li>➤ Inspect first aid kits, fire extinguishers, fire alarms, and other safety equipment including the FM firefighting system.</li> <li>➤ Inspection tours and visits</li> </ul>	<ul style="list-style-type: none"> <li>➤ Contractor</li> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI Management</li> </ul> <p>Frequency: Weekly inspections of PPEs and Working conditions</p>	<ul style="list-style-type: none"> <li>➤ Compliance to the use of PPEs on site recorded in progress reports</li> <li>➤ No near miss accidents or injuries recorded due to negligence or noncommitment to the use of PPEs</li> </ul>	<p>Cost of PPEs range around 50\$ per worker and is to be bared by the contractor.</p>

E&S Category	Parameters And Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
		<ul style="list-style-type: none"> <li>○ Coordinate and locate the nearest medical facility and hospital to the site. Numbers of first aid response services shall be circulated to workers.</li> <li>➤ TRAFFIC SAFETY: Clearing the site when reversing vehicles for loading/ unloading activities. As well as other mitigation measures highlighted in the traffic safety section.</li> </ul>					
Social Environment	<p><b>Community Health</b></p> <ul style="list-style-type: none"> <li>➤ PUBLIC ENGAGEMENT</li> <li>➤ NUISANCE AND WASTE</li> </ul>	<ul style="list-style-type: none"> <li>➤ STAKEHOLDER ENGAGEMENT: Ensure adequate stakeholder engagement and community awareness regarding the project. The outcome, concerns, and recommendations of the consultation activities shall be documented and reviewed to include in the project's operations.</li> <li>➤ GRIEVANCE MECHANISM: Establish an open communication channel with the public to lodge their concerns and complaints.</li> <li>➤ HEALTH AND SAFETY: Employ mitigation measures stated for air quality, noise, waste, traffic, and other parameters as identified in this ESMP.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Feedback from consultation activities</li> <li>➤ Availability of an effective public GM</li> <li>➤ Monitoring visits to ensure compliance to the ESMP</li> </ul>	<ul style="list-style-type: none"> <li>➤ Contractor WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI Management</li> </ul> <p>Frequency: Monthly or as needed</p>	<ul style="list-style-type: none"> <li>➤ Complaints received are adequately resolved and corrective actions recorded</li> <li>➤ Log and records of stakeholder engagement activities.</li> </ul>	<p>No additional budgetary requirements for the implementation of the indicated mitigation measures.</p>
	<p><b>Gender Based Violence</b></p> <ul style="list-style-type: none"> <li>➤ GENDER BASED VIOLENCE (GBV); SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARASSMENT (SH) RISKS TO THE CURRENT FEMALE WORKERS</li> </ul>	<ul style="list-style-type: none"> <li>➤ GBV GRIEVANCES REFERAL MECHANISM: The workers' GM should include measures for GBV referral.</li> <li>➤ CODE OF CONDUCT: Ensure that code of conduct is circulated to all contracted project workers and that it is covered within their training. Workers must read and sign the Code of Conduct. The CoC contains the required conduct expected from workers, their rights, occupational health and safety requirements, reporting, GBV prevention, and penalties in cases of breaching the CoC.</li> <li>➤ EMPLOYMENT: Measures stated in the labor rights in terms of employment must be adhered to.</li> <li>➤ CAPACITY BUILDING: The E&amp;S orientation session should cover GBV prevention.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Monitoring of patterns in grievances to ensure that Gender Based Violence grievances are spotted and immediately resolved</li> <li>➤ Review of employment procedures</li> <li>➤ CoC records</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI management</li> </ul> <p>➤ Frequency: Monthly and as needed</p>	<ul style="list-style-type: none"> <li>➤ No GBV related grievances arise.</li> <li>➤ Effective referral mechanisms in the GM</li> <li>➤ Workers have received the GBV measures and COC in trainings</li> <li>➤ Workers understood, read, and signed the COC</li> </ul>	<p>No additional budgetary requirements for the implementation of the indicated mitigation measures.</p>

E&S Category	Parameters And Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
	➤ PREJUDICE AGAINST WOMEN WORKING IN CONSTRUCTION SITES						

Table 5: Environmental and Social Management Matrix During Operations

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
OPERATIONAL PHASE							
Physical Environment	<p><b>Air Quality / Emissions, Fumes &amp; Dust</b></p> <ul style="list-style-type: none"> <li>➤ EXISTING FUMES FROM CURRENT OPERATIONS</li> <li>➤ EMISSIONS FROM EXPANSION PRODUCTION PROCESSES</li> <li>➤ EMISSIONS FROM EXISTING DIESEL GENERATORS</li> <li>➤ DUST FROM SHREDDING AND HANDLING OF RECYCLED MATERIALS</li> <li>➤ VENTILATION SYSTEM EFFICIENCY</li> <li>➤ MAINTENANCE AND REPAIR ACTIVITIES</li> <li>➤ EMISSIONS FROM VEHICLES</li> </ul>	<ul style="list-style-type: none"> <li>➤ AIR QUALITY MEASUREMENTS: in its current production operations, the company should conduct air quality, particularly fumes, measurements to ensure that their current operations are within acceptable limits to OHS. Additional corrective actions and mitigation measures will be determined based on the results of the measurements.</li> <li>➤ PERSONAL PROTECTIVE EQUIPMENT: Workers have been noticed to be provided with, and commit to the use of gloves, hairnets, and work clothing. However, and depending on the testing results other PPEs might be required such as goggles, masks, and industrial grade masks.</li> <li>➤ TEMPERATURE CONTROLS: Implement strict temperature control measures to ensure that polymers are not heated beyond recommended temperatures, minimizing the release of aldehydes, butane, and alkenes.</li> <li>➤ EQUIPMENT TRAINING: As training is included within the anticipated activities, ensure a comprehensive knowledge transfer and intensive training for operators on optimal machine operation to prevent incorrect temperature settings that could lead to the release of VOCs and fumes.</li> <li>➤ MACHINERY MAINTENANCE: ensure that all equipment and machinery have a maintenance schedule prepared for them.</li> <li>➤ ELECTRICITY GENERATORS MANAGEMENT: Ensuring both diesel generators are equipped with high-efficiency air filters and are</li> </ul>	<ul style="list-style-type: none"> <li>➤ Measurements of air quality in the production premises</li> <li>➤ Document any grievances received on air quality matters</li> <li>➤ Inspection of conditions of PPEs and their usage</li> <li>➤ Daily inspection routines</li> <li>➤ Maintenance logs of machinery</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ MoH</li> <li>➤ MoL</li> </ul> <p>Frequency: Quarterly</p>	<ul style="list-style-type: none"> <li>➤ Logs of maintenance of machinery and equipment</li> <li>➤ Installation of fume capturing and HVAC systems.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Air Quality test costs estimated between 500-2000\$. Depending on testing parameters.</li> <li>➤ cost of emissions capturing systems for the shredder / granulator unit is expected to</li> </ul>

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
		<p>maintained regularly. Install an air filter for the second generator and ensure that maintenance is being conducted for both regularly per the manufacturer's specifications.</p> <ul style="list-style-type: none"> <li>➤ DUST MANAGEMENT IN SHREDDING AND RECYCLING: Employ advanced dust collection systems and localized exhaust ventilation at points where dust is generated during the recycling process.</li> <li>➤ HVAC SYSTEM INSTALLATION AND UPKEEP: Ensure that the production area is equipped with a heating, ventilation, and air conditioning (HVAC) system to reduce entrapment of emissions as well as ensuring optimal operating temperatures for machinery and for OHS of the workers. Ensure that maintenance is adequately conducted for HVAC systems to guarantee their efficiency, particularly during high-demand periods.                             <ul style="list-style-type: none"> <li>○ Filter air exhaust from material handling and granulation areas using a cyclone and / or baghouse for particulates from raw material.</li> <li>○ Ensure Installation of ventilation control systems, especially at the points of highest processing temperatures along the production line.</li> </ul> </li> <li>➤ Explore options depending on air quality tests for VOCs and fumes that could include; Installation of local exhaust extraction systems and activated carbon adsorbers; Installation of recuperative / regenerative thermal oxidizers, catalytic / regenerative catalytic oxidizers, condensers or biofilters. The engineering firm should advise on the most appropriate solution based on quality tests.</li> <li>➤ SAFE MATERIALS FOR MAINTENANCE: Use of low-VOC solvents and adhesives in maintenance work, executed in well-ventilated spaces or with specialized exhaust systems to capture emissions.</li> <li>➤ VEHICLE EMISSION CONTROL: Optimize vehicle routes to avoid passing through densely populated areas and maintain vehicles to ensure emission levels are minimized.</li> </ul>					<p>cost around 5000\$.</p> <p><i>*This is an estimation based on literature review and available data. The company should obtain accurate quotation based on their engineering design and selected technology.</i></p>
	<p><b>Nuisance (Noise / vibration)</b></p> <ul style="list-style-type: none"> <li>➤ HIGH NOISE LEVELS FROM CURRENT OPERATIONS</li> <li>➤ NEW PRODUCTION LINE NOISE</li> <li>➤ VEHICULAR NOISE</li> </ul>	<ul style="list-style-type: none"> <li>➤ NOISE LEVEL MANAGEMENT: Implement administrative and engineering controls to reduce noise at the source within the factory. This includes routine maintenance of current machinery to prevent excessive noise and the installation of noise dampening materials around high-noise areas.</li> <li>➤ NOISE LEVEL OPTIMIZATION: Ensure all machinery, including the production line, is fitted with noise-dampening materials and silencers where feasible. Regular maintenance should be performed to reduce noise emissions from machinery.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Use noise level measurement instruments, taking readings when operating any noise producing machinery or equipment</li> <li>➤ Record each reading with date,</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ EQA</li> <li>➤ MoL</li> </ul> <p>Frequency: quarterly or as needed when noise levels are suspected to be</p>	<ul style="list-style-type: none"> <li>➤ Noise levels log do not display patterns of exceeding the recommended guidelines</li> <li>➤ Complaints matrix show</li> </ul>	<ul style="list-style-type: none"> <li>➤ Cost of noise measurement equipment (Sound Level Meter): already included in the installation</li> </ul>

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
		<ul style="list-style-type: none"> <li>➤ ACOUSTIC INSULATION: Install acoustic barriers or insulation around high-noise areas, particularly near the air compressor and thermoforming production line to contain noise within the facility.</li> <li>➤ WORKER PROTECTION: Provide personal protective equipment (PPE), such as earplugs or earmuffs, to workers in high-noise areas and enforce usage protocols in line with OSHA 1910.95 (a)&amp;(b) regulations.</li> <li>➤ MONITORING AND TRAINING: Conduct noise level monitoring, quarterly at minimum, to ensure compliance with permissible limits and provide training for workers on the risks of noise exposure and the importance of hearing conservation practices.</li> <li>➤ ADHERANCE TO NATIONAL NOISE REGULATIONS: The factory shall adhere to the Palestinian Standard on Ambient Noise Levels (PS 840- 2005), where for residential areas this is defined as 50 dB max. in daytime and 40 max. at nighttime</li> <li>➤ USE OPTIMIZATION: Optimize the use of machinery that generate noise (e.g., turn off when idle).</li> <li>➤ MAINTENANCE: Continuous maintenance of vehicles and equipment in accordance with the manufacturer's recommendations.</li> <li>➤ VEHICULAR MOMVENTS: Limit the movement of vehicles to daytime only. Avoid roads that are adjacent to Noise Sensitive Receptors through logistics planning (e.g., schools, hospitals, places of worship).</li> </ul>	<ul style="list-style-type: none"> <li>location, time, and source of noise</li> <li>➤ Site monitoring visits</li> </ul>		above permissible values	resolution of any complaints received	<ul style="list-style-type: none"> <li>phase budget.</li> <li>➤ Cost of sound insulating material is estimated at 5 -10\$ / m<sup>2</sup>. Assuming needing ±500 m<sup>2</sup>. This would amount to 2500 - 5000\$.</li> </ul>
	<p><b>Traffic and Vehicular Movements</b></p> <ul style="list-style-type: none"> <li>➤ IMPORT OF RAW MATERIAL &amp; EXPORT OF FINAL PRODUCTS</li> <li>➤ ACCIDENTS</li> </ul>	<ul style="list-style-type: none"> <li>➤ MAINTENANCE: Ensure that vehicles are continuously maintained in accordance with the manufacturer's recommendations. And a maintenance log for vehicles as well to be established.</li> <li>➤ DRIVING PRACTICES: Apply strict measures on safe driving practices, signaling, fastening safety belts, and adhering to speed limits.                             <ul style="list-style-type: none"> <li>○ Limit the speed of vehicles to 20km/hr. when entering the residential area leading to the site.</li> </ul> </li> <li>➤ MOVEMENT SCHEDULES: Set a movement schedule that all vehicles should adhere to, avoiding rush hours and nighttime.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Travel logs with date and time records</li> <li>➤ Grievances records to verify complaints resulting from speeding or unsafe practices</li> <li>➤ Maintenance logs of vehicles</li> </ul>	➤ WPI	<ul style="list-style-type: none"> <li>➤ PIA</li> </ul> <p>Frequency: quarterly or as required</p>	<ul style="list-style-type: none"> <li>➤ Accident-free operations.</li> <li>➤ No near miss situations reported</li> <li>➤ Grievances are handled and corrective measures</li> </ul>	No additional budgetary requirements for the implementation of the indicated mitigation measures.

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
		<ul style="list-style-type: none"> <li>➤ COVERING AND SECURING LOADS: ensure that all vehicles' loads are fastened and secured.</li> <li>➤ REVERSING ALARMS: ensure that all heavy vehicles are equipped with reversing alarms.</li> <li>➤ LOADING/UNLOADING PROTOCOLS: Establish safe protocols for loading and unloading activities, ensuring that they occur in designated areas away from general traffic.                             <ul style="list-style-type: none"> <li>○ ensure that the company shall dedicate specific areas for loading and unloading that are clearly marked and no parking should be allowed around it.</li> </ul> </li> </ul>				recorded and applied	
	<p><b>Visual Impacts</b></p> <ul style="list-style-type: none"> <li>➤ MAINTENANCE OF PAINT AND FACILITIES</li> <li>➤ ACCUMULATION OF WASTE</li> </ul>	<ul style="list-style-type: none"> <li>➤ HOUSEKEEPING: Continuous and daily housekeeping of site                             <ul style="list-style-type: none"> <li>○ Remove unused equipment and machinery and store them in their designated location.</li> <li>○ Waste to be collected in their designated containers, no open laying waste should be left on site.</li> <li>○ Organize the raw material in the storage hanger over the racks and do not leave raw material sacks on the floor.</li> </ul> </li> <li>➤ MAINTENANCE: Continuous maintenance of paint and facilities.</li> <li>➤ LANDSCAPING: The company has existing green areas and a park within the facility. These should be maintained to keep the positive aesthetical value of the area.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Daily site inspection by site supervisor records of housekeeping</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> </ul> <p>Frequency: quarterly or as required</p>	<ul style="list-style-type: none"> <li>➤ Complaints and grievances log indicate that any related grievances are resolved with description of the corrective actions</li> </ul>	Maintenance budget has to be allocated annually per the requirements of the facility
	<p><b>Solid Waste</b></p> <ul style="list-style-type: none"> <li>➤ PRODUCTION WASTE AND DEFECTS</li> <li>➤ PACKAGING WASTE</li> <li>➤ MIXING DIFFERENT TYPES OF WASTE</li> </ul>	<ul style="list-style-type: none"> <li>➤ PRODUCTION WASTE REDUCTION: Implement lean manufacturing techniques to minimize production defects. Conduct regular quality checks to identify and rectify process inefficiencies that lead to waste. For waste that cannot be reintroduced into the process, the company shall continue engaging with farmers and livestock breeders to provide them with it for reuse. If the quantities are substantially larger than what is needed by these parties, the company shall explore partnerships with hand-craft and reuse organizations and NGOs to provide them with the products.</li> <li>➤ PACKAGING WASTE MANAGEMENT: Establish a reduction program targeting packaging waste. Engage in material recovery programs for nylon wrapping and explore the</li> </ul>	<ul style="list-style-type: none"> <li>➤ Visual inspection of the segregation of waste</li> <li>➤ Logs of waste generation</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ Municipality</li> </ul> <p>Frequency: Quarterly / annual for waste statistics</p>	<ul style="list-style-type: none"> <li>➤ Logs display reduction of waste quantities annually</li> <li>➤ successful agreements for the recycling/ reuse of carboard, nylon and</li> </ul>	No additional budgetary requirements for the implementation of the indicated mitigation measures.

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
		<p>possibility of recycling, and reuse through providing it to interested parties such as farmers and livestock breeders.</p> <ul style="list-style-type: none"> <li>➤ WASTE SEGREGATION ENFORCEMENT: Reinforce waste segregation practices to prevent the mixing of different types of waste, expand the waste segregation and storage practices as implemented for municipal waste to process waste.                             <ul style="list-style-type: none"> <li>○ Provide clear labeling and separate bins for each process waste type and train employees on proper segregation practices.</li> <li>○ Ensure that segregated waste is handled appropriately throughout the disposal process.</li> </ul> </li> <li>➤ HOUSEKEEPING: Daily housekeeping includes collection, disposal, and emptying of waste containers.</li> <li>➤ LIAISON: Liaise with the municipality for the disposal of defect products and any packaging and process waste. This includes containers and collection frequency. Additionally, liaise with the municipality for the emptying of the septic tank.</li> </ul>				<p>other waste as appropriate</p>	
	<p><b>Hazardous Material and Waste</b></p> <ul style="list-style-type: none"> <li>➤ STORAGE OF OILS AND LUBRICANTS</li> <li>➤ SPILLS AND LEAKS</li> <li>➤ EMPTY CONTAINERS AND BARRELS OF OILS AND LUBRICANTS</li> <li>➤ MAINTENANCE WASTE</li> </ul>	<ul style="list-style-type: none"> <li>➤ STORAGE FACILITIES: Ensure that all oils and lubricants are stored in their allocated storage area and that they are returned to their location once used and immediately.</li> <li>➤ LABELING: Clearly label all containers with the type of chemical, its hazards, and handling instructions.</li> <li>➤ SAFETY DATA SHEETS (SDS): Maintain up-to-date SDS for all chemicals on-site and ensure they are accessible to all employees.</li> <li>➤ SAFE DISPOSAL: ensure that all maintenance waste is collected in a designated location, is clearly labelled, and is transported and disposed in line with the instructions and through liaison with the municipality.</li> <li>➤ OCCUPATIONAL HEALTH AND SAFETY: Workers shall be provided with full protection PPEs, including gowns, industrial gloves, industrial scale masks, goggles, and other as appropriate according to manufacturer specifications.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Ensure that the SDS are available and accessible</li> <li>➤ Ensure that the PPEs provided to workers match the safety datasheets</li> <li>➤ Ensure through visual inspections that chemicals barrels are not being disposed of with solid waste</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ EQA</li> </ul> <p>Frequency: Quarterly or as required</p>	<ul style="list-style-type: none"> <li>➤ Worker's grievance logs do not show concerns regarding the handling of hazardous waste or adequacy of PPEs</li> <li>➤ Civil defense license issued regarding sufficient safety and emergency preparedness measures</li> </ul>	<p>No additional budgetary requirements</p>

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
	<p><b>Labor Rights</b></p> <ul style="list-style-type: none"> <li>➤ WORKPLACE INSURANCES</li> <li>➤ GRIEVANCES</li> <li>➤ WORKERS' E&amp;S CAPACITY</li> <li>➤ EXCLUSION OF SOME VULNERABLE AND MARGINALIZED GROUPS FROM EMPLOYMENT</li> </ul>	<ul style="list-style-type: none"> <li>➤ CLEAR EMPLOYMENT CONTRACTS: Ensure that every worker, regardless of their position, is provided with a clear and comprehensive employment contract that outlines their rights, duties, compensation, working hours, and other essential terms.</li> <li>➤ CODE OF CONDUCT: Implement and adopt the Code of Conduct (CoC) as available in Annex I. The CoC contains a demarcation of labor rights, responsibilities and GBV related measures..</li> <li>➤ TRAINING: The Project Workers shall receive an E&amp;S orientation training prior to the commencement of the operations phase, covering the CoC, GM, OHS, ERP, Waste management, and the ESMP overall.</li> <li>➤ ADHERENCE TO MINIMUM WAGE ACT: While the company has been audited and has been noted to adhere to the minimum wage act. Still, regular Monitoring shall be conducted especially for the new hires under the expansion project to review the wages being paid to ensure they meet the minimum wage requirements set by the Palestinian Authority.</li> <li>➤ MANDATORY INSURANCE: All workers must be provided with contractual documentation and are to be covered by a valid occupational health insurance policy.</li> <li>➤ WORKERS' GRIEVANCE MECHANISM (GM): A workers' Grievance Mechanism shall be established in accordance with Annex II. Uptake channels shall be disseminated to workers and should be effective and accessible.</li> <li>➤ RECRUITMENT AND EMPLOYMENT: Recruitment shall be conducted in a transparent manner including issuing announcements for vacancies, reviewing applications based on merit and qualifications, and documenting scores provided for each applicant for later review shall audits be required or if grievances were received through the company's GM.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Audit of employment contracts</li> <li>➤ Interviews with workers</li> <li>➤ Log of CoC signature</li> <li>➤ Grievances log</li> <li>➤ Training and capacity building logs.</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ MoL</li> </ul> <p>Frequency: Quarterly or as required</p>	<ul style="list-style-type: none"> <li>➤ Compliance of wages with the minimum wage act</li> <li>➤ No grievances received regarding labor rights. / Resolution of received grievances</li> <li>➤ Signage of CoC</li> <li>➤ Trainings conducted on E&amp;S aspects</li> </ul>	<ul style="list-style-type: none"> <li>➤ E&amp;S trainings and awareness sessions to be provided by the E&amp;S Focal point at no additional cost, session miscellaneous costs are estimated to be ±300\$ per session.</li> </ul>
	<p><b>OHS</b></p> <ul style="list-style-type: none"> <li>➤ OHS CAPACITY AND TRAINING</li> <li>➤ OCCUPATIONAL HEALTH AND SAFETY</li> </ul>	<ul style="list-style-type: none"> <li>➤ REGULAR E&amp;S AUDITS AND MONITORING: In line with ISO 14001, the company shall undergo an audit prior to March 2026 to renew its environmental management system certificate. Additionally, OHS aspects and working conditions should be covered in the periodic E&amp;S monitoring reports.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Inspection of PPEs and their conditions</li> <li>➤ Commitment of using PPEs on site</li> <li>➤ Review of complaints log</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ MoL</li> </ul> <p>Frequency: Quarterly or as required</p>	<ul style="list-style-type: none"> <li>➤ Compliance to the use of PPEs on site recorded in</li> </ul>	<ul style="list-style-type: none"> <li>➤ Cost of PPEs range around 50\$ per worker. With an additional 80</li> </ul>

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
	<ul style="list-style-type: none"> <li>➤ FIRE RISKS</li> <li>➤ LACK OF COMPLIANCE WITH NATIONAL LAWS AND PROCEDURES ON OHS</li> </ul>	<ul style="list-style-type: none"> <li>➤ OHS CAPACITY BUILDING: While the supplier is to provide WPI workers with OHS trainings. The OHS supervisor shall also conduct continuous OHS trainings and awareness to workers, which is part of the role of the OHS supervisors in line with Law. No 3 of 2019. This includes regular OHS training sessions, drills, and awareness campaigns to maintain high safety standards.                             <ul style="list-style-type: none"> <li>○ Establish an OHS committee in line with Law No.3</li> <li>○ The committee and OHS supervisor to conduct toolbox meetings with workers.</li> </ul> </li> <li>➤ Provide proper training on material handling, operation of the new machinery and production lines, and the use personal protective equipment (PPE).</li> <li>➤ OHS RISK ASSESSMENT: Implement a thorough risk assessment process to identify potential hazards associated with loading/unloading, machinery operation, and chemical handling and other operational processes.</li> <li>➤ OHS CONTROL MEASURES: Ensure effective control measures are in place, such as engineering controls, administrative controls, and the use of personal protective equipment (PPE).</li> <li>➤ MEDICAL EXAMINATIONS: in line with Decision of Council of Ministers No. (22) of 2003 on Initial medical examinations of workers and Decision of Council of Ministers No. (24) of 2003 on conducting periodic medical checkups for workers, workers in the plastics industry, as it is categorized in relevance to medical checkups a non-hazardous industry, are to undergo medical checkups every two years.                             <ul style="list-style-type: none"> <li>○ The company shall establish a log of medical checkups for their workers and this log is to be examined during monitoring visits.</li> </ul> </li> <li>➤ PPES COMPLIANCE: Provide workers with masks, gloves, boots, gowns, hairnets, earmuffs, goggles, and other PPEs as appropriate.</li> <li>➤ WORKPLACE SAFETY: Ensure floors are non-slip, regularly cleaned, and free from obstacles. Place warning signs in wet areas.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Review training records</li> <li>➤ Site visits and checks of site conditions</li> <li>➤ Medical checkups of workers</li> </ul>			<ul style="list-style-type: none"> <li>progress reports</li> <li>➤ No near miss accidents or injuries recorded due to negligence or noncommitment to the use of PPEs</li> <li>➤ Medical records of employees</li> <li>➤ Establishment of an OHS committee</li> </ul>	<ul style="list-style-type: none"> <li>workers, total number is estimated at 330 workers.</li> <li>➤ OHS training cost is included in the tasks of the OHS supervisor to be hired in line with Law No.3 of 2019 on OHS supervisors. Their salary is expected to be around 1200 – 2000\$. Miscellaneous costs for training sessions are estimated at 300\$.</li> </ul>

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
		<ul style="list-style-type: none"> <li>○ Ensure proper ventilation and HVAC in areas where dust or fumes might accumulate and where temperature build ups from production processes might arise.</li> <li>○ Provide cooling or heating systems as necessary, and allow regular breaks for workers in extreme temperature areas.</li> <li>○ Set up warning signs near electrical connections, rotating and heavy machinery, noise generating equipment, face masks signs, and others as appropriate.</li> <li>○ Ensure that workers adhere to the designated smoking area.</li> <li>○ Equip the facility with fire detectors, alarm systems and firefighting equipment.</li> <li>➤ MAINTENANCE: establish a maintenance log for all systems, including HVAC, filters, and machinery and equipment to avoid any OHS incidents resulting from faults.               <ul style="list-style-type: none"> <li>○ Maintain monitoring and detection systems including firefighting equipment, sensors, temperature meters, and others.</li> </ul> </li> <li>➤ OHS PLAN: The supplier shall provide an OHS plan, with ERP, relevant to the thermoforming production line installation and operation.               <ul style="list-style-type: none"> <li>○ A suggested general OHS Plan template and Emergency Response Procedures is available through the following link : <a href="#">OHS Plan and ERP Template</a>.</li> </ul> </li> <li>➤ HOUSEKEEPING: Periodic housekeeping, turn of idle equipment and machinery that are not being used.</li> <li>➤ SKILLED WORK: only skilled workers will be allowed on the vicinity of works relating to operating heavy and rotatory machinery, electrical works, maintenance, and other processes requiring specialized skills.</li> </ul>					

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
		<ul style="list-style-type: none"> <li>➤ FIRST AID: Provide first aid kits on the site, ensure that kits are provided in adequate number per workers and that they are always accessible, and in good condition at all times.                             <ul style="list-style-type: none"> <li>○ Coordinate and locate the nearest medical facility and hospital to the site. Numbers of first aid response services shall be circulated to workers.</li> </ul> </li> <li>➤ TRAFFIC SAFETY: Clearing the site when reversing vehicles for loading/ unloading activities.                             <ul style="list-style-type: none"> <li>○ Implement the mitigation measures relevant to accidents and traffic safety as detailed in the traffic safety section.</li> </ul> </li> </ul>					
	<p><b>Fire Hazard and Risks</b></p> <ul style="list-style-type: none"> <li>➤ ELECTRICAL CONNECTIONS AND INSTALLATION OF NEW PRODUCTION LINES</li> <li>➤ MACHINERY OVERHEATING/MALFUNCTIONS</li> <li>➤ SMOKING NEAR STORAGE AND WASTE COLLECTION AREAS</li> <li>➤ ACCUMULATION OF PACKAGING WASTE</li> <li>➤ POLYMERIC DUST</li> </ul>	<ul style="list-style-type: none"> <li>➤ MONITORING: Employ temperature measurement and control measures, including appropriate ventilation and installation of HVAC system to avoid hot working environments and overheating of machinery.                             <ul style="list-style-type: none"> <li>○ Implement maintenance tests for fire alarms and sprinklers annually at minimum or per the civil defense instructions.</li> </ul> </li> <li>➤ WORKPLACE SAFETY: Install firefighting alarms, smoke detectors, and extinguishers in accordance with civil defense instructions.                             <ul style="list-style-type: none"> <li>○ Prohibit smoking in storage areas and on facility, dedicate a specific smoking area away from waste collection and raw material storage areas.</li> <li>○ Implement sound and daily housekeeping practices, collect waste packaging and others in designated containers, and liaise with municipality for daily collection of waste.</li> </ul> </li> <li>➤ WORKPLACE DESIGN: Ensure that near granulators and shredders the flooring and walls are non-stick to minimize the amount of dust that could settle.</li> <li>➤ HOUSEKEEPING: Ensure daily and adequate housekeeping to remove and decrease the amount of accumulated dust and waste.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Inspection by site supervisor</li> <li>➤ records of housekeeping to clean the site from the packaging waste and defect products</li> <li>➤ Records of any fire accident</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> <li>➤ Civil Defense</li> </ul> <p>Frequency: quarterly or as required</p>	<ul style="list-style-type: none"> <li>➤ No accidents, fires or near miss accidents recorded</li> <li>➤ maintenance logs of firefighting equipment and systems</li> </ul>	<p>HVAC system cost is included in the installation phase matrix.</p> <p>Other items are part of the project budget.</p>

E&S Category	Parameters and Impacts	Mitigation Measures	Monitoring Measures	Implementation Responsibility	Monitoring Responsibility & Frequency	Success Indicators	Budgetary Requirements
	<p><b>Community Health and Safety</b></p> <ul style="list-style-type: none"> <li>➤ VISITORS HEALTH AND SAFETY</li> <li>➤ DISCONTINUED STAKEHOLDER ENGAGEMENT</li> <li>➤ GRIEVANCES</li> </ul>	<ul style="list-style-type: none"> <li>➤ VISITORS' HEALTH AND SAFTY: Before allowing visitors into operational areas, provide a brief orientation on the mitigation and protective measures.</li> <li>➤ SIGNAGE: Place clear warning signs near machinery and other hazardous areas.</li> <li>➤ RESTRICTED AREAS: Designate certain high-risk areas as off-limits to visitors.</li> <li>➤ Ensure that access to the production lines is limited to qualified workers.</li> <li>➤ GRIEVANCE MECHANISM: Establish a grievance mechanism for the public in accordance with Annex II.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Grievances log and reports</li> <li>➤ Feedback from consultation activities</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> </ul> <p>Frequency: quarterly or as needed</p>	<ul style="list-style-type: none"> <li>➤ Complaints received are adequately resolved and corrective actions recorded</li> </ul>	<p>No additional budgetary requirements for the implementation of the indicated mitigation measures.</p>
<p>Social Environment</p>	<p><b>Gender Based Violence (GBV)</b></p> <ul style="list-style-type: none"> <li>➤ GENDER BASED / SEXUAL EXPLOITATION AND ABUSE</li> <li>➤ SEXUAL HARASSMENT</li> <li>➤ EXCLUSION</li> </ul>	<ul style="list-style-type: none"> <li>➤ EMPLOYMENT AND ADMINISTRATIVE MANAGEMENT: employment, promotions, raises, and other administrative procedures should be based on merit and qualifications, any other considerations such as gender, socio-economic status, religion, race, and other social factors should not impact the employment and evaluation process.</li> <li>➤ CODE OF CONDUCT: Implement the code of conduct as specified in the ESMF of the F4J II project and the project specific code of conduct available in Annex I. The code of conduct contains specific clauses on the prevention of GBV (SEA/SH).</li> <li>➤ CAPACITY BUILDING AND TRAINING: Include the Code of Conduct provisions and mitigation measures for GBV in the trainings provided to the workers. The training provided shall cover GBV topics, basic definitions and literacy, and prevention and reporting.</li> <li>➤ GRIEVANCE MECHANISM: Provide an open grievance mechanism and provide an overview about it as a focus session to the women working in the company.                             <ul style="list-style-type: none"> <li>○ The Workers' and Public GMs shall include specific measures for reporting and referral of grievances related to GBV (SEA / SH).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>➤ Monitoring of patterns in grievances to ensure that Gender Based Violence grievances are spotted and immediately resolved</li> <li>➤ Review of employment procedures CoC records</li> </ul>	<ul style="list-style-type: none"> <li>➤ WPI</li> </ul>	<ul style="list-style-type: none"> <li>➤ PIA</li> </ul> <p>Frequency: Monthly and as needed</p>	<ul style="list-style-type: none"> <li>➤ No GBV related grievances arise.</li> <li>➤ Effective referral mechanisms in the GM</li> <li>➤ Workers have received the GBV measures and COC in trainings</li> <li>➤ Workers understood, read, and signed the COC</li> </ul>	<p>Conducting awareness sessions to female workers on the GM and its GBV referral mechanism by the E&amp;S focal point.</p> <p>Miscellaneous costs for the sessions are estimated at 300\$.</p>

## 8. Institutional Arrangements

### 8.1. Demarcation of Responsibilities

#### 8.1.1. Al-Wafa Plastic Industries

WPI holds critical duties and responsibilities throughout the entire lifecycle of the project. During the installation phase, and based on the relatively minor and short-termed duration of its activities, the expected activities that mainly entail the finishing works of the new building and installation of the new thermoforming line and its accessories and connections, the management and supervision of implementation of the mitigation measures is expected to be done by WPI. WPI assumes supervision responsibilities, ensuring that all aspects of the project are executed safely, efficiently, and in accordance with established measures. This includes overseeing contractors and managing the project's environmental and social impacts. Furthermore, during the operational phase, WPI takes on the overall implementation and management responsibility.

For this, the capacity needs of the company have been identified and an E&S focal point has been assigned who is the company's Quality Engineer. Additionally, the company and in line with Law No.3 of 2019 is expected to hire an OHS supervisor or train a staff member in accordance with MoL regulations to be authorized to supervise OHS aspects on site, the OHS Supervisor shall be hired/ trained & assigned by no later than end of Q1 2024. The training on OHS aspects shall be in line with MoL regulations and OHS requirements based on law No.3 of 2019. Moreover, the company is expected to form an OHS committee in line with Law No.3 requirements.

#### 8.1.2. The PIA

The PIA does not have direct interventions in the project's implementation, including its ESMP adherence and implementation of the mitigation measures. Nevertheless, the PIA has a supervisory role through conducting quarterly E&S monitoring visits and reports through their ESO or through independent third-party consultants. The monitoring will verify the compliance and implementation of the ESMP and its mitigation measures, as well as the progress and compliance with the conducted E&S audit's Corrective Action Plan.

#### 8.1.3. Contractors and Suppliers

Contractors' role in this project is relatively limited as it pertains to the finishing works of the new building, where remaining minor civil works are needed, in addition to the supply, installation, and commissioning of the new thermoforming production line and the installation of its connections and accessories. Therefore, it is not expected from contractors to hire dedicated E&S officers but rather assign one of their staff to follow up on E&S related matters and to report to WPI.

Additionally, as an international procurement operation, the supplier is expected to have the capacity to provide WPI with an OHS plan for the installation, commissioning, and operation of the new thermoforming machine, the OHS plan shall contain Emergency Response Procedures (ERP) as well. The supplier shall provide the needed OHS capacity building to WPI Staff on OHS relevant to the operation of the new thermoforming production line.

## 8.2. Contractors' Duties and Responsibilities During the Installation Phase

This section outlines the Environmental and Social duties of Contractors and any subcontractors concerning the realization of WPI's expansion project. Contractors (defined to include both main contractors and any subcontractors) are expected to align their activities with the ESMP. Given their familiarity with required scope of work, the contractors should be well-versed in the workforce, health, and safety risks and measures associated with such operations.

It is the Contractors' responsibility to review the ESMP and its management plans. They should update them to reflect any additional risks or mitigation measures necessary to ensure a safe working environment for their workers, the public, and the company's property.

The ESMP aims to monitor the effectiveness of the identified mitigation actions during the project's various phases. Risks related to each phase and their mitigation measures should be incorporated into the bidding documents issued to contractors. These measures should also be part of the contracts awarded to these contractors, forming a component of the legal agreement. Section 7.3 below highlights the contractual clauses that will be part of the bidding documents and legal agreement. These clauses will encompass the required mitigation measures for each phase, including the Grievance Mechanism requirements, OHS Plan, ERP, coordination, monitoring, and reporting.

For the successful integration of environmental and social standards into the project, the Contractor must adopt the measures in this ESMP, as highlighted in section 7.2 below. These measures will form an integral part of the bidding documents and legal agreement.

The Contractors are responsible for considering all the mitigation measures listed in this report, in section 7.3, and the ESMP as whole when planning and during each phase of the project. WPI on the other hand, must monitor and document any changes in the project's scope or any deviations from the terms and conditions stated in this report. Both the Contractors and the company bear primary responsibility for mitigation and monitoring tasks. They must also ensure proper communication and coordination with all relevant stakeholders as identified in Chapter 9.

The contractor must understand that this ESMP, being an integral part of the contractual agreement, mandates adherence to the environmental and social measures and the mitigation actions highlighted herein. Any noncompliance with the ESMP constitutes a breach of the legal agreement. Written warnings will be issued in such cases, and failure to comply will result in penalties as stipulated in the contract.

Contractors are required to appoint an E&S Focal Point for addressing environmental, social, and OHS issues. This individual should possess a comprehensive understanding of the environmental and social issues outlined in the ESMP matrix. The contractor and their E&S Focal Point are responsible for:

- Ensuring adherence to all requirements of the relevant ESMP measures during all activities.
- Comply with all the mitigation measures stipulated in chapters 6 & 7 of the ESMP under the installation phase for each contractor in their respective phase of operation.
- Ensuring that waste generated during these phases, both municipal and construction-related, is disposed of in designated landfills. Burning of waste is strictly prohibited.
- Reporting to the company and consulting with them to gain a comprehensive understanding of potential impacts, appropriate application of mitigation measures, management of unforeseen impacts or incidents, and adherence to monitoring requirements.
- Continuously updating the ESMP and its management plans to reflect on-site conditions and regularly reporting to the company.

- Bearing the costs associated with implementing mitigation and monitoring measures.
- Obtaining all necessary licenses and permits as mandated by local regulations.
- Offering training to contractor and subcontractor staff on environmental and social issues as outlined in the ESMP.
- Conducting weekly toolbox meetings regarding E&S and OHS matters.
- Conducting follow-up and analysis of environmental and social incidents.
- Promptly reporting accidents and incidents and maintaining an incident register on-site. Accidents must be reported verbally on the day of occurrence, followed by a detailed report within 48 hours.
- Ensuring labor rights and conditions align with national laws, including the PLL and the minimum wage act No.4 of 2021, and the stipulations of this ESMP.
- Providing workers with insurance in accordance with the PLL.
- Establishing a functional grievance mechanism for workers.
- Equipping the site with essential safety equipment, including first aid kits and fire extinguishers. A vehicle should always be available for emergencies.
- Thermoforming line supplier shall provide an OHS plan relevant to the thermoforming production line installation and operation. The OHS Plan shall include Emergency Response Procedures (ERP).
- Occupational Health and Safety (OHS) Plan and the "Emergency Response Procedures" as referenced in this ESMP.
- Implementing all other requirements and measures defined in this ESMP and its associated management plans.
- Setting up a workers' grievance mechanism in line with this ESMP and the Company's GM.

### 8.3. Bidding Documents Environmental and Social Clauses

This section denotes the required commitments expected from contractors to comply with in their bids and that will constitute a part of the legal agreement once awarded with respect to environmental and social considerations. The following clauses shall be part of the bidding documents issued and will play a part in the evaluation of bids, the evaluation is suggested to be based on a pass/fail system, where if contractors commit to providing the E&S requirements then their financial and technical offers will be evaluated ;

- Compliance with ESMP: The contractor shall comply with all requirements, mitigation measures, and monitoring activities outlined in the ESMP, particularly those identified in chapters 6 and 7.
- Appointment of E&S Focal Point: The contractor shall appoint an Environmental and Social (E&S) Focal Point responsible for ensuring the implementation of the ESMP requirements, coordinating with the company, and reporting any environmental or social incidents, and management of the GM, as well as ensuring adherence to OHS measures.
- Waste Management: The contractor shall ensure proper disposal of waste resulting from the finishing and installation works in designated landfills. Burning of waste is strictly prohibited.
- Labor Rights and Conditions: All labor rights and conditions shall adhere to national laws, including the Palestinian Labor Law (PLL) and the minimum wage act No.4 of 2021. Contractors shall submit a worksheet of their workers' data including their identification numbers (IDs), names, and age.
- Insurance: The contractor shall provide insurance against injury and workman compensation for all workers in line with the PLL.
- Workers' Grievance Mechanism: The contractor shall establish and maintain a grievance mechanism for workers, in line with the requirements of the ESMP and the company's grievance mechanism.

- Compliance to National Laws and Legislations and GIIP: Contractors shall commit to local laws and legislations including but not limited to the Palestinian Labor Law, Palestinian General Health Law, Minimum Wage Decree, and other applicable laws and legislations as defined in the ESMP. They shall also commit to the World Bank's Operational Policies (O.Ps), namely O.P 4.01, and GIIPs as demarked in the ESMP.
- Occupational Health and Safety: The contractor shall ensure that all workers are provided with appropriate personal protective equipment (PPE) and are trained on its proper use. Safety measures shall be implemented to prevent accidents, especially during machinery operation. OHS plan shall be adhered to as referenced in the ESMP.
  - OHS Plan: The supplier shall provide an OHS plan relevant to the thermoforming production line installation and operation. The OHS plan shall include Emergency Response Procedures (ERP) .
- Training: The contractor shall provide necessary training to their staff on environmental and social issues as defined in the ESMP. OHS matter shall be strictly adhered to and weekly toolbox meetings on OHS shall be committed to.
- WPI Capacity Building: The supplier shall provide WPI workers with trainings on OHS and operation procedures of the new thermoforming production line.
- Emergency Response: The contractor shall adhere to the "Emergency Response Procedures" as outlined in the ESMP. Contractors shall notify the project owner of any incident or grievance received within 24 hours, with a detailed report following within 48 hours.
- Child Labor: The contractor shall not employ any individual under the age of 18, in line with the PLL.
- Monitoring and Reporting: The contractor shall regularly monitor environmental and social impacts and report to the company. Any non-compliance or incidents shall be immediately reported.
- Code of Conduct: All the Contractors' workforce shall read and sign the Code of Conduct available in Annex I of the ESMP.
- Noise and Vibration: The contractor shall implement measures to minimize noise and vibration impacts, especially in areas close to residential units. The contractor shall ensure that noise levels do not exceed the permissible limits set by local regulations and international standards.

## 8.4. Monitoring and Reporting

Records generated from the implementation of the ESMP and its associated plans, whether filled out by the contractor or WPI's staff, shall be maintained by the administrative team. This will be in line with procedure retention, storage and retrieval requirements, as well as access control and other requirements designed to preserve the accessibility and integrity of records. Drills, accidents, and other forms and records shall also be maintained by the administrative staff.

### 8.4.1. Monitoring

The monitoring activities for the project will consist of;

#### I. Al-Wafa Plastic Industries

- The E&S Focal Point & OHS Supervisor: Will be available on-site during installation activities as part of WPI team, and during operations to monitor and report on E&S and OHS aspects. Their role involves conducting regular inspections and reporting any discrepancies or issues related to the ESMP. The E&S Focal Point & OHS Supervisor will conduct continuous monitoring of E&S and OHS aspects and will generate standalone reports as required, especially during emergencies, incidents, or in cases of significant breaches of the ESMP, and will report directly to WPI management. Their role will entail the national requirements

relevant to the implementation of OHS measures, and will generate reports that will also be shared with the PIA.

- Continuous monitoring of E&S and OHS aspects in line with the E&S Focal Point & OHS Supervisor responsibilities.

## **II. PIA**

- F4J ESO / E&S Consultant : monthly or quarterly site visits, depending on project phase and needs to ensure compliance to the ESMP either by the F4J ESO or by a third-party independent consultant.

### **8.4.2. Reporting**

Project's reporting activities shall consist of the following;

#### **I. Al-Wafa Plastic Industries**

- WPI is expected to generate quarterly reports on the compliance with the ESMP. These reports shall also include OHS aspects as described in the monitoring and reporting section of the OHS plan.

#### **II. PIA**

- F4J ESO / E&S Consultant : quarterly monitoring reports by the PIA

These reports shall include photos to support visual assessment of the ESMP implementation. Additionally, the E&S monitoring and evaluation may be conducted at unspecified times to avoid any cover ups during expected visits. The reports should highlight current environmental and social problems that are persistent despite the implementation of the mitigation measures, any newly discovered environmental and social risks that were not reported in the ESMP, and interviews with selected samples of the workers and staff.

### **8.4.3. Incident Reporting**

In cases of emergencies or incidents, WPI shall notify the DAI 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 without limitation any allegations of gender-based violence and/or sexual exploitation, abuse and harassment (GBV/SEAH).

WPI shall notify the DAI within 24 hours of any occurrence, at least verbally. And a follow up detailed report shall be submitted from WPI to DAI within 48 of occurrence. WPI shall provide enough detail regarding 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 supervising entity, as appropriate while ensuring confidentiality especially for GBV/SEAH related incidents.

Subsequently, as per the Bank's request, DAI shall submit the report on the incident or accident to the Bank and propose any measures to prevent its recurrence.

## 9. Stakeholder Engagement and Information Disclosure

### 9.1. The Project Stakeholders

Project stakeholders include (i) Project Affected Parties (PAPs), these include those likely to be affected by the project because of actual impacts or potential risks to their physical and social environments, health, security, cultural practices, well-being, or livelihoods. The second are (ii) Project Interested Parties (OIPs); who are individuals, groups, or organizations with an interest in the project, which may be the result of the project location, its characteristics, its impacts, or matters related to the public interest.

For WPI, PAPs have been identified to include;

- The Project Beneficiary: WPI management
- Project workers (direct and contracted)
- Neighbors and residents of the project vicinity

Additionally, OIPs have been identified to include;

- Environment Quality Authority
- The Municipality
- Civil Defense
- Ministry of National Economy
- Ministry of Health
- Ministry of Labor
- Chamber of Commerce
- Hebron Polytechnical University

### 9.2. Conducted Stakeholder Engagement Activities

Due to the recent unfortunate events that took place in the country post October 7<sup>th</sup>, the West Bank has seen continuous closures and movement restrictions. Due to grief that the country is going through, the scheduled public engagement meetings were halted and instead bi-lateral consultation meetings were conducted with main stakeholders as identified in the previous section.

On December 31<sup>st</sup> 2023, a series of bi-lateral stakeholder engagement has been conducted, namely with EQA, MoH, Hebron Polytechnic University, and Hebron Municipality. The engagements were to inform stakeholders of the prospective expansion activities and have discussed the current facilities, the company's activities and operations, a description of the planned activities as described in chapter 2, and the ESMP including the expected risks and proposed mitigation measures. While the consultant has tried to reach the identified stakeholders in section 8.1, only 4 of these stakeholders have responded. The table below presents the summary of the feedback received from each stakeholder;

Additionally, for stakeholders identified in section 8.1 that despite various trials did not respond to communications, an email was sent out providing a brief on the expansion project and the ESMP on January 11<sup>th</sup> 2024, namely to the Palestinian Civil Defense; MoL; MoNE; and the Chamber of Commerce. A draft ESMP was attached to the email for their review, and a brief of the GM and uptake channels were provided to receive their feedback. Where the ESMP is a dynamic document, any received remarks, comments, or clarifications will be reflected to it accordingly.

Table 6: Stakeholder Engagement Summary

Stakeholder	Contact Person	Topic	Remarks / Answers	Follow Up Action / ESMP Measures
Environment Quality Authority (EQA) – Hebron Office	Eng. Taleb Hmeid (EQA Hebron Director)	EQA requirements	EQA welcomed the project and the efforts of the company to ensure meeting national requirements, Mr. Taleb stated that they will check internally the status of WPI's existing facilities in terms of environmental approval. Additionally, Mr. Taleb requested that WPI to approach EQA to obtain the environmental requirements for the expansion project, including submitting the specifications of the new production line. He further stated that EQA will conduct a field visit as part of their mandate for Environmental Monitoring.	<ul style="list-style-type: none"> <li>- WPI to contact EQA to understand EQA requirements and submit the new Production line specifications.</li> <li>- WPI to contact EQA to ensure that they meet all required measures.</li> <li>- WPI to coordinate and contact EQA is Reflected to the mitigation measures</li> </ul>
Hebron Municipality – Environment Health Department	Eng. Malak Al Useili (Environment Health Department)	Hebron Municipality Requirements (Wastewater / Solid Waste / Services)	The municipality has their own system for environmental pollution prevention, this caters to the prevention of industrial waste disposal to the general waste containers, and to coordinate with the municipality for specific containers and collection and disposal frequency. The system also has penalties ranging between 1000 – 4000 depending on the case. As for wastewater, the municipality has a wastewater department that should be liaised with to allocate a location for wastewater disposal once the septic tank is to be emptied.	<ul style="list-style-type: none"> <li>- Prohibition of disposal of defective or packaging waste into the general waste containers has been added.</li> <li>- Coordination with the municipality for collection and disposal frequencies and location has been added.</li> <li>- Requirement to liaise with the municipality prior to emptying the septic tank has been added</li> </ul>
Polytechnic University Hebron	Dr. Malek Salhab (Director of the OHS and Environment Institute)	OHS Compliance and the partnership with the University	<p>Mr. Salhab stated that the institute provides consultancies to the company on OHS and ISO compliance. Mr. Salhab has stressed on the importance of Ergonomics, noise, and air quality in the factory premises.</p> <p>He stressed on the importance of ensuring that the new space for the Thermoforming line is equipped with needed ventilation and noise</p>	<ul style="list-style-type: none"> <li>- HVAC and noise measures are included in the ESMP.</li> </ul>

			suppression methods to ensure a safe ergonomic environment.	
Ministry of Health – Environment Health Department	Mr. Nader Barhoush (Environment Health Director)	Health Requirements for the Expansion Project	<p>Mr. Barhoush stressed that the company should ensure the inclusion of the governmental related entities in the project and he thanked that the company has approached MoH in this regard.</p> <p>Mr. Barhoush requested that the company to check with MoNE over their requirements for this expansion project, who in turn will contact MoH, EQA and other relevant ministries for permits/ approvals as needed.</p>	<ul style="list-style-type: none"> <li>- WPI to contact MoNE and ensure that they apply for an expansion permit as needed. Where MoNE will contact MoH, EQA, and other ministries as needed to obtain their requirements / feedback.</li> <li>- MoNE coordination has been reflected to the ESMP and its Matrix.</li> </ul>

### 9.3. Information Disclosure

Al Wafa Plastic Industries adheres to the principles of transparency and open communication, recognizing the importance of keeping stakeholders informed and engaged in its operations. As part of this commitment, WPI ensures the accessibility of its Environmental and Social Management Plan (ESMP) to the public. The ESMP, a critical document that outlines WPI's approach to managing environmental and social risks, will be made available on the company's official website, allowing stakeholders to review and provide feedback.

In addition to online availability, WPI will distribute physical copies of the ESMP in strategic locations within the community, such as local government offices and community centers. This is to ensure that all stakeholders, including those with limited internet access, can easily obtain the information.

WPI is committed to regularly updating stakeholders on the progress of its projects. Information regarding milestones, achievements, and any changes to the project timeline will be communicated through WPI's official channels, including the company's website and local media outlets. This ensures that stakeholders are always informed about the latest developments.

## 10. Grievance Mechanism

A key component of WPI's stakeholder engagement strategy is the implementation of an effective Grievance Mechanism (GM). Detailed information about the GM, including the procedure for filing grievances and subsequent processes, will be transparently disclosed. The GM forms will be accessible both online and at designated physical locations. WPI will also conduct awareness campaigns to familiarize the community and employees with the GM.

The Grievance Mechanism (GM) is an integral component of the ESMP, structured on dual levels: the Project Level GM for the public and the Workers' GM for project employees.

- **Project Level GM:** This mechanism is designed to foster open communication between stakeholders and WPI's management. Its primary objective is to swiftly and effectively address and resolve issues raised by stakeholders, ensuring that their

concerns are heard and acted upon. The project level GM of WPI will be connected with the F4J II GM that is managed by the PIA (DAI). The company will report received grievances in accordance with the reporting requirements to the PIA as stipulated in chapter 8. The Company's Project level GM will be based on the F4J II GM to ensure that it meets the requirements of the World Bank O.Ps and the F4J II's ESMF.

- **Workers' GM:** Tailored for WPI's workforce, this mechanism provides a structured avenue for employees to voice their grievances, concerns, and feedback. The Workers' GM contains referral mechanisms for GBV related grievances and delineates clear timeline and processes for handling grievances. During the installation phase, contractors are mandated to equip their teams with a robust grievance mechanism, aligning with the standards set in WPI's GM, detailed in Annex II. As with the project level GM, WPI will report received Workers' Grievances in line with the reporting requirements stipulated under chapter 8.

The GM serves as a pivotal tool to pinpoint and address environmental and social challenges stemming from the project's activities, ensuring timely and appropriate interventions. The main steps of grievance resolution start with submission of grievances through the provided uptake channels available in Annex II, following the company sends out an acknowledgement of receipt of grievance, within 3 business days, the company shall provide a decision on the grievance of being approved for revision or declined as it may be unrelated to the project, have been submitted before, or malicious. If approved, the company shall notify the complainant and will provide a response within 2 weeks of receipt of the complaint. If the complainant is not satisfied with the decision, they will be informed of their right to pursue their complaint with the management or with the courts.

Additionally, the GM has specific referral mechanisms dealing with GBV (SEA / SH) Grievances whether they are on the project level, or workers' GM. The referral mechanism will be implemented in partnership with SAWA organization and is detailed in annex II.

To ensure maximum outreach and awareness, the GM, along with a concise project overview, will be disseminated through various media channels, including social media platforms, website, and physical locations among other channels. A user-friendly Arabic version, tailored for public accessibility, is provided in Annex II.

All grievances channeled through the GM will be cross-referenced with the matrix in Chapter 7. This process helps determine if the raised concern is a previously identified issue or a novel one, warranting inclusion in the ESMP's subsequent revisions.

The company has different uptake mechanisms that need enhancements in line with the GM available in Annex II; the company's website while having a page for complaints and suggestions, it is not easily accessible and does not provide information about the process, uptake channels, and does not provide anonymity option, nor a timeline for the resolution. Additionally, the company does not have a systematic procedure for handling grievances, especially for workers' grievances, which are resolved traditionally through the management. As such, the needed enhancements are related to updating the webpage to include a description about the GM, providing the project workers with the GM brief available in Annex II, and providing capacity building to the E&S focal point on the GM. This is all considered in the ESMP mitigation measures and matrix and does not require additional budget.

Company Website page: <https://www.wpi.ps/en/contact-us>

## 11. Budgetary Requirements

The implementation of the mitigation and monitoring measures could be accompanied with additional costs as necessary provisions will have to be implemented to eliminate and/ or reduce negative potential impacts. Most of the mitigation measures specified in the ESMP matrix are based on avoidance, and as such do not have any additional cost related to them. Nevertheless, several mitigation measures and monitoring activities are still associated with cost to contractors and to the company that need to be identified, these include;

Table 7: Cost Estimate of the Implementation of the ESMP

Action	Cost	Qty /year	Responsibility	Timeframe
<b>1. Capacity Building</b>				
Hiring / Training of an OHS Supervisor	1600\$ / month* <sup>25</sup>	continuous	WPI	Prior to initiating installation phase
WPI's Staff OHS Training	300\$	4	WPI – OHS Supervisor	Prior to Operational Phase <i>*Due to the large number of workers, several sessions will be needed</i>
E&S Orientation Sessions	300\$	4	WPI – E&S Focal Point	Prior to Operational Phase <i>*Due to the large number of workers, several sessions will be needed</i>
GM session and GBV referral Mechanisms for Female Workforce	300\$	1	WPI – E&S Focal Point	Prior to Operational Phase
<b>2. INSTALLATION PHASE</b>				

<sup>25</sup> Final Salary Value depends on selection process, qualifications, and negotiations with the candidate

Action	Cost	Qty /year	Responsibility	Timeframe
HVAC and fume extraction systems	100,000\$* <sup>26</sup>	One-time	WPI	Prior to Operational Phase
Monitoring of noise levels – purchase of Noise Level Meter	100\$	One-time	WPI – E&S Focal Point / OHS supervisor	Continuous
Cost of PPEs	-	-	Contractor	To be borne by the contractor
Emissions Capturing system for granulator / shredder	5000\$	One time	WPI	Prior to Operational Phase
Sound insulation material and installation	10\$ / m <sup>2</sup>	±500	WPI	Prior to Operational Phase
<b>TOTAL For Installation Phase</b>				<b>130,000 \$</b>
<b>3. OPERATIONAL PHASE</b>				
Air Quality Tests	2000\$	1	WPI	Annual
PPEs	50\$	330	WPI	Prior to Operational Phase * One time
Capacity Building Costs detailed in point 2.	20,100\$	-	WPI	Continuous
<b>TOTAL / First Year</b>				<b>38,000\$\$</b>
<b>TOTAL Yearly after</b>				<b>20,100\$</b>

<sup>26</sup> The Exact number and value for the system cannot be determined accurately until air quality tests have been conducted. And following the selection of the most appropriate technology, size, and specifications according to the test results. Hence this budget is indicative.

## ANNEX I: Code of Conduct Sample

### مدونة قواعد السلوك وأخلاقيات العمل

#### مقدمة

يأتي الاهتمام بمواثيق سلوك وأخلاقيات العمل والتشغيل كأحد مداخل تطوير الاداء للعاملين وأصحاب العمل. إن إعداد مدونة قواعد السلوك وأخلاقيات العمل من شأنه تعزيز قيم والممارسات الايجابية في العمل، وتعد مدونة السلوك إطاراً عاماً يجب على العاملين في المشروع التقيّد به والعمل بمقتضاه، فهي مدونة تلقي الضوء على المعايير والاختلاف والقيم التي يجب أن يتحلّى بها العامل أثناء أداء واجباته، ومن ثم فهي قواعد ستسهم على نحو فاعل في الارتقاء بمستوى جودة الاداء والارتقاء به. إن هذه المدونة تشكل جزءاً من مقتضيات العمل في المشروع بالتركيز على اجراءات الوقاية والسلامة والصحة العامة، ويجب تطبيقها في كل اوقات العمل وطوال فترة التشغيل، وسوف يتم تزويد كل عامل بنسخة منها، ليقراها ويعمل بموجبها.

#### تعريفات مهمة

• **العنف الجنسي والعنف القائم على النوع الاجتماعي:** مصطلح شامل لأي فعل ضار يرتكب ضد إرادة الشخص ويستند إلى الفروق المنسوبة اجتماعياً بين الذكور والإناث (أي الجنس). ويشمل الأفعال التي تلحق الأذى، أو المعاناة الجسدية أو الجنسية أو العقلية، والتهديد بمثل هذه الأفعال، والإكراه، وغير ذلك من أشكال الحرمان من الحرية .

• **الاستغلال والاعتداء الجنسيان (SEA):** يُعرّف بأنه أي إساءة فعلية أو محاولة إساءة استغلال لموقف ضعف أو قوة تفاضلية أو ثقة لأغراض جنسية ، بما في ذلك، على سبيل المثال لا الحصر، تحقيق الربح المادي أو الاجتماعي أو السياسي من الاستغلال الجنسي من جانب آخر.

• **الاعتداء الجنسي:** "التدخل الجسدي الفعلي أو المهدّد بطابع جنسي ، سواء بالقوة أو في ظل ظروف غير متكافئة أو قسرية."

• **التحرش الجنسي (SH):** sexual harassment التحرش الجنسي غير المرغوب فيه ، وطلب خدمات جنسية ، وغير ذلك من السلوك اللفظي أو الجسدي ذي الطبيعة الجنسية.

• **التحرش الجنسي مقابل الاستغلال والانتهاك الجنسيين :** يحدث الاستغلال الجنسي ضد مستفيد أو فرد من المجتمع. ويحدث التحرش الجنسي بين أفراد / موظفي مؤسسة أو شركة وينطوي على أي تقدم جنسي غير مرغوب فيه أو سلوك لفظي أو جسدي غير مرغوب فيه ذي طبيعة جنسية. يعد التمييز بين الاثنين أمرًا مهمًا بحيث يمكن أن تتضمن في سياسات الوزارة وتدريب الموظفين على تعليمات محددة حول إجراءات الإبلاغ عن كل منهما.

• **الموافقة:** هي الاختيار الكامن وراء قرار الشخص الطوعي بفعل شيء ما. يجب منح الموافقة على أي نشاط جنسي بحرية، وموافقة على الانسحاب، وتتخذ مع أكبر قدر ممكن من المعرفة، ومحددة للموقف. إذا تم الحصول على اتفاق باستخدام التهديدات، أو الأكاذيب، أو الإكراه أو استغلال اختلال توازن القوى، فهذه لا تعتبر موافقة.

### أولاً: المبادئ الأساسية لمدونة السلوك وأخلاقيات العمل

إن جودة الأداء ونجاح العمل تتوقف على الالتزام بقواعد السوك العامة وأخلاقيات العمل، والتصرف بطريقة عادلة وصادقة كأفراد مسئولين اجتماعيا انطلاقا من ايماننا الراسخ بمسؤوليتنا الاجتماعية التي لها أثرا إيجابيا كبيرا على المشاريع التي نعمل بها. ولتحقيق هذا، يجب علينا احترام هذه المبادئ الأساسية:

• **النزاهة والامانة:** الأيمان بتعزيز التصرف بأمانة في جميع العلاقات مع التقيد الصارم بجميع القوانين المعمول بها، احترام كرامة كل شخص والحفاظ على سلامتهم.

• **الشفافية:** الاحترام المتبادل والحوار والشفافية هي أساس العلاقة مع اصحاب العمل والسلطات ذات العلاقة، والتي تتوافق مع مبادئ التعاون والصدق والانفتاح.

• **الموضوعية والاستقلالية:** العمل بموضوعية واستقلالية وتجنب أي نوع من أنواع الفساد أو تضارب المصالح الذي قد يؤثر على اتخاذ القرارات المتعلقة بالعمل.

• **المسؤولية:** توفير بيئة عمل آمنة وصحية للعمال، واحترام الحقوق والتقيد بالواجبات من مقتضى المسؤولية، واحترام المجتمعات التي نعمل فيها.

### ثانياً: قواعد السلوك وأخلاقيات العمل

#### القسم الاول: الحقوق العامة

- يلتزم العامل بتأدية عمله بإخلاص وأمانة وبالمحافظة على أسرار العمل وأدواته، ويعتبر مسؤولاً عن الأدوات التي في عهده وعليه الحفاظ عليها، وفي حالة وجود ظرف خارج عن ارادته او قوة قاهرة، فان العامل لا يعتبر مسؤولاً عن خلل الأدوات أو ضياعها.
- على العامل أن يلتزم بأخلاقيات العمل والحفاظ على خصوصية السكان والعمال في منطقة العمل، دون الاشتباك معهم أو التسبب بأي أذى لهم بأي شكل كان. ويجب الامتناع عن المشاركة في أي عنف بدني او لفظي لأي من العاملين أو السكان.
- على العامل التقيد بساعات العمل المطلوبة، وكذلك التقيد والامتناع بالمهام المكلف بها من قبل صاحب العمل.
- على العامل الالتزام بإجراءات السلامة المتبعة في الموقع، خاصة عند استخدام الآلات الخطرة، وأي إجراءات إضافية يتم طلبها من قبل اصحاب العمل.

- على العامل الالتزام باستخدام أدوات ومعدات الحماية المطلوبة وعلى صاحب العمل توفيرها له/لها.
- يجب على العامل الإبلاغ فوراً عن أي أمراض مزمنة يعاني منها أو عند الشعور بالإعياء، وعن أي عقاقير يتلقاها العامل.
- الامتناع عن التسبب بأي نوع من المضايقات سواء اللفظية المباشرة أو غير المباشرة لأي شخص أثناء فترة العمل، وخاصة من فئة النساء والأطفال وذوي الاحتياجات الخاصة.
- من حق العامل أن يوقع عقد عمل مع صاحب العمل على أن يكون باللغة العربية، وذلك لحفظ حقوق العامل، علماً بأن عقد العمل يجب أن يتضمن: الأجر، نوع العمل، مكانه ومدته، ساعات وأوقات العمل، كما ويجب ان يتضمن العقد الاجراءات الصحية وشروط الوقاية المتعلقة بالصحة والسلامة المهنية، ويجب أن يوقع العقد من قبل صاحب العمل والعامل بحيث يحتفظ العامل بنسخة أصلية من العقد.
- علي صاحب العمل أن يلتزم بالتأمين على جميع عماله عن إصابات العمل لدي الجهات المرخصة في فلسطين.
- يجب أن تتخلل ساعات العمل اليومي فترة أو أكثر لراحة العامل لا تزيد في مجموعها عن ساعة مع مراعاة ألا يعمل العامل أكثر من خمس ساعات متصلة دون تخصيص وقت للراحة.
- التقيد بأوقات العمل وتكريس اوقات العمل للقيام بالمهام والواجبات المتعلقة بطبيعة العقد، كما نص عليها عقد العمل.
- ضمان حق العامل في التظلم او الشكوى من اي انتهاك لحقه او من اتخاذ قرار خاطئ بحقه.
- تعتبر مدونة السلوك هذه جزئاً لا يتجزأ من العقد والاتفاق القانوني المبرم ما بين العامل وصاحب العمل.

#### القسم الثاني: حماية حقوق النساء

- معاملة النساء باحترام بغض النظر عن العرق، أو اللون، أو اللغة، أو الدين، أو الرأي السياسي، أو غير السياسي، أو الأصل، أو الإعاقة، أو أي وضع آخر.
- عندما يكون لدى المرأة العاملة مخاوف أو شكوك فيما يتعلق بأعمال العنف القائم على النوع الاجتماعي من قبل اصحاب العمل او اي طرف ذو علاقة بالعمل، يجب عليها الإبلاغ عن هذه المخاوف وفقاً لإجراءات الشكاوى المعتمدة في المشروع. على ان يتم التعامل مع هذه الشكاوى بخصوصية كبيرة للحفاظ على كرامة المشتكية.
- يجب توفير الحماية للنساء وتهيئة أماكن آمنة في العمل للنساء وخاصة الحوامل والتأكد من عدم نقل أي امرأة حامل بشكل غير صحيح، والعمل على ازالة او منع تعرض النساء الحوامل للمخاطر.
- يجب توفير أماكن للنظافة الشخصية لاستخدامها من قبل النساء العاملات بعد الانتهاء من العمل. وايضا توفير مرافق صحية) دورات مياه (خاصة بالنساء في اماكن العمل، ويجب أن يتم تعقيم هذه الأماكن بشكل يومي.
- يجب تنفيذ لقاءات توجيهية قبل بدء العمل في الموقع للتأكد من أن الجميع على دراية بقواعد السلوك الخاصة بالعنف القائم على النوع الاجتماعي.

#### القسم الثالث: حماية حقوق ذوي الاعاقات

- يلتزم اصحاب العمل بتهيئة البيئة الملائمة لاحتياجات ذوي الاحتياجات الخاصة وتوفير تسهيلات الحركة والتنقل في اماكن العمل.
- عدم التمييز بحق المعاقين والمعاقات في العمل، واحترام حقهم / هن في اختيار نوعية الاعمال التي تناسب قدراتهم /تهن، واهتماماتهم/هن واحتياجاتهم/هن.
- الالتزام بتوفير خدمات ومرافق صحية مواءمة لاستخدامات ذوي الاعاقة الحركية في مواقع العمل.

#### القسم الرابع: الصحة والسلامة المهنية

- على العامل التقيد بتطبيق شروط واجراءات الصحة والسلامة العامة الصادرة عن وزارة الصحة الفلسطينية، والالتزام بقواعد السلامة والصحة المهنية في العمل.
- على صاحب العمل تقديم الإسعافات الأولية اللازمة للعامل في حال الاصابة ونقله إلى أقرب مركز للعلاج

- الالتزام بإجراءات ومتطلبات السلامة والصحة المهنية بما في ذلك ارتداء واستخدام معدات الصحة والسلامة والالتزام بالتعليمات وحضور والالتزام بالتدريبات المتعلقة.

#### القسم الخامس: التبليغ:

إذا لاحظ أي شخص سلوكًا يعتقد أنه قد يمثل انتهاكًا لمدونة قواعد السلوك هذه، أو للتبليغ عن سلوك يتعلق بشخصه / شخصها ، فيجب عليه / عليها إثارة المشكلة على الفور إلى الإدارة التابع/ة لها.

سيتم الحفاظ على سرية هوية الشخص، ما لم يكن الإبلاغ عن الادعاءات مكلّفًا بموجب قانون الدولة. يمكن أيضًا تقديم شكاوى أو ادعاءات مجهولة المصدر وشكاوى متعلقة بالعنف القائم على النوع الاجتماعي والتحرش الجنسي وسيتم أخذها في الاعتبار. نحن نتعامل بجدية مع جميع التقارير المتعلقة بسوء السلوك المحتمل وسنحقق ونتخذ الإجراء المناسب. سنقدم توصيات لمقدمي الخدمة الذين قد يساعدون في دعم الشخص الذي تعرض للحادث المزعوم، حسب الاقتضاء.

لن يكون هناك أي تبعات أو عواقب لأي شخص يثير مخاوف بحسن نية بشأن أي سلوك محظور بموجب مدونة قواعد السلوك هذه. مثل هذا الانتقام أو أي عواقب ستكون انتهاكًا لمدونة قواعد السلوك هذه.

#### القسم السادس: عواقب انتهاك مدونة السلوك

قد يؤدي أي انتهاك لقواعد السلوك هذه من قبل الموظفين والعمال إلى عواقب وخيمة ، بما في ذلك الإنهاء والإحالة المحتملة إلى السلطات القانونية.

#### استمارة استلام

لقد تلقيت نسخة من مدونة قواعد السلوك مكتوبة بلغة أفهمها. أفهم أنه إذا كان لدي أي أسئلة حول مدونة قواعد السلوك هذه، فيمكنني الاتصال بالشؤون الإدارية في الشركة التي أعمل لديها لمزيد من التوضيح

اسم الموظف \ العامل : \_\_\_\_\_

التوقيع : \_\_\_\_\_

التاريخ : \_\_\_\_\_

التوقيع بالتصديق – مدير الشركة (اسم الشركة) \_\_\_\_\_

الاسم والتوقيع : \_\_\_\_\_

التاريخ: \_\_\_\_\_

المرفق 1: السلوكيات التي تشكل الاستغلال والاعتداء الجنسيين (SEA) والسلوكيات التي تشكل تحرشًا جنسيًا (SH)

### المرفق 1 لمدونة قواعد السلوك

السلوكيات التي تشكل الاستغلال والاعتداء الجنسيين (SEA) والسلوكيات التي تشكل تحرشًا جنسيًا (SH)

تهدف القائمة غير الشاملة التالية إلى توضيح أنواع السلوكيات المحظورة، تشمل أمثلة الاستغلال والاعتداء الجنسيين، على سبيل المثال لا الحصر:

- يخبر عامل المشروع أحد أفراد المجتمع أنه يمكنه الحصول على وظائف متعلقة بموقع العمل (مثل الطهي والتنظيف) مقابل ممارسة الجنس.
- يقول أحد العاملين في المشروع أنه يمكنهم تقديم أجهزة أو خدمات أو تفضيلات للنساء مقابل ممارسة الجنس.
- يقوم أحد العاملين في المشروع باغتصاب أحد أفراد المجتمع أو الاعتداء عليه جنسيًا
- يمنع عامل المشروع أي شخص من الوصول إلى الموقع / الخدمات ما لم يقدم خدمة جنسية

• يخبر عامل المشروع الشخص الذي يتقدم للحصول على عمل بموجب العقد أنه لن يقوم بتوظيفه إلا إذا مارس الجنس معه.

أمثلة على التحرش الجنسي في سياق العمل

- تعليق عامل المشروع على مظهر عامل أو طاقم مشروع آخر (سواء كان إيجابياً أو سلبياً) والرغبة الجنسية.
- عندما يشكو عامل المشروع من التعليقات التي أدلى بها عامل آخر على مظهره / مظهرها ، يعلق العامل الآخر في المشروع بأنه "ي\تطلب ذلك" بسبب طريقة لبسه\ها.
- اللمس غير المرغوب فيه للعامل / الموظفين من قبل عامل آخر في المشروع
- يخبر عامل المشروع عامل آخر في المشروع أنه سيحصل له / لها على زيادة في الراتب ، أو ترقية إذا أرسل له / لها صوراً عارية لنفسه.

## ANNEX II: Grievance Redress Mechanism

### 1. DEFINITIONS

- **The complaint:** A written, or electronic document submitted by the complainant or his agent that reports a wrong behavior or shortening to perform a service or taking an action that the company or one of its employees was supposed to do, or regarding any form of discrimination or violation of the legislation in force, and it shall be submitted to the E&S focal point or management of the company.
- **The complainant:** any normal person, his agent, his guardian, and every legal person or agent who has submitted a complaint about damaging or suffering as a result of the implementation of the project, its implementation mechanisms, or its results.
- **Project Workers:** These include the direct workers hired to work for Al-Wafa Plastic Industries (WPI) in a direct way, and the contracted workers who will be involved in WPI's expansion project through contractor firms, suppliers, consultancy firms, or engineering firms.

### 2. PROJECT DEFINED GRIEVANCES CLASSIFICATION

Expected impacts and their relevant mitigation measures are listed in the ESMP matrix, Chapter 7 of the ESMP, the received complaints and grievances shall be screened against the matrix in order to resolve the issues and determine the most appropriate resolution. Grievances that may be received are included under the following categories listed in the ESMP and its matrix;

- Social & Socio-economic impacts
- Physical environment impacts
- Health and Safety
- Employment, labor rights and working conditions.

Received grievances can be categorized according to their frequency and severity into the following;

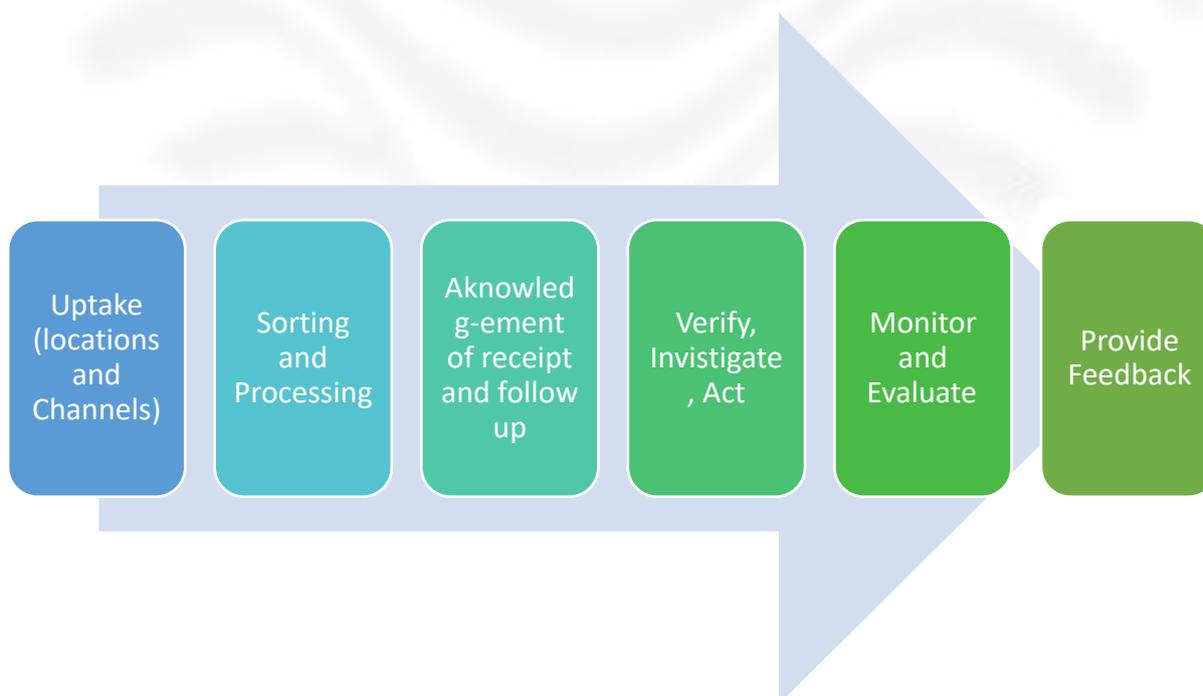
Category	Description	Severity	Resolution
<b>A</b>	Standard impacts and issues that are mostly, but not necessarily, included in the ESMP and an approved answers can be provided instantly	Low	Report to complainant, fill grievance form, and fill the grievance log.
<b>B</b>	Impacts that are not frequent or may have a one-time occurrence nature and are of a local nature	Medium	Consult the project management to draft an appropriate response.
<b>C</b>	Frequent, or potentially high impact or widespread that requires immediate attention.	Potentially High	Prioritize depending on severity and involve the project management to resolve and set a management strategy. Moreover, include impact in the updated ESMP and management plans.

### **3. THE GRIEVANCE REDRESS MECHANISM**

The first step for ensuring a successful implementation of the grievance redress mechanism is making it public, available, and easily accessible. This does not only include publicizing it, but rather making sure that it is one of the essential topics covered in public consultations and that the stakeholders are aware of its existence, processes, timelines, and hierarchy.

This mechanism will apply to the public, as well as the project workers involved directly or being contracted to work for the benefit of WPI's expansion project.

The following simplified value chain describes the steps involved in the GM, which shall be described in further detail in the following sections.



#### **4. PUBLIC GRIEVANCES UPTAKE CHANNELS**

The E&S focal point designated from WPI's team will be responsible for the overall management of the public's grievances, review, verification, preparation of response, and recommending mitigation measures to the management.

Uptake channels will be as follows;

1. By Email: arine.nd@wpi.ps
2. By Phone: +972 594594993
3. By Personal Visit: Al-Wafa Plastic Industries, Abu De'ijan, Hebron.
4. By Website: <https://www.wpi.ps/en/contact-us>
5. By Facebook Page Messages: <https://www.facebook.com/Alwafa.Plastic.Industries>

#### **5. DIRECT WORKERS' GRIEVANCES UPTAKE CHANNELS**

WPI will provide their workers with appropriate uptake mechanisms to voice their concerns and grievances to the management, the E&S focal point will be responsible for direct liaison with the administrative affairs and the company's management to resolve workers' complaints. The E&S focal point in turn, will voice their complaints directly to the company's management through the same process and timeline for resolution.

Additionally, the company will be responsible for allocating a complaints box that is easily accessible to all workers and at a location that is neutral, away from management offices, and not monitored by security cameras.

1. By Email: arine.nd@wpi.ps
2. By Phone: +972 594594993
3. By Personal Visit: Al-Wafa Plastic Industries, Abu De'ijan, Hebron.
4. By Website: <https://www.wpi.ps/en/contact-us>
5. By Facebook Page Messages: <https://www.facebook.com/Alwafa.Plastic.Industries>
6. Through filling their complaints details and putting it in the complaints box

#### **6. CONTRACTED WORKERS' GRIEVANCES UPTAKE CHANNELS**

Contractors shall apply this grievance mechanism to their workers and any subcontracted workers, this GM will be part of the ESMP which is an integral part of the bidding documents, and where the contractors will have to reflect this grievance redress mechanism to their operations.

The contractor shall appoint an E&S/ OHS focal point who will liaise and report to WPI's E&S focal point. The progress reports provided by contractors shall include grievances received, number, types, resolution, and other details.

The GM will be covered in the E&S training and toolbox meetings conducted by the contractor. They shall provide their workers with the following uptake channels and set up a complaints box on site. The contractor shall fill the corresponding details and circulate them to all workers.

1. By Email: Once the contractor is selected
2. By Phone: Once the contractor is selected
3. By filling the grievance form at the office of the E&S focal point's office
4. Through filling their complaints details and putting it in the complaints box

#### **7. ANONYMOUS GRIEVANCES**

The GM also includes an anonymous reporting process as some complainants may choose to file a complaint anonymously. Channels to accept and respond to anonymous grievances will be communicated to project affected parties during the consultation meetings and throughout project implementation. Anonymous complaints should provide factual details and specific allegations of misconduct or serious wrongdoing related to any of the project activities. The E&S Supervisor shall ask the complainant about the preferable way to inform him/her of the solution.

Complainants can request that their personal identification information to be anonymized. Complainants are encouraged to maintain contact details in order to report back to them with resolution.

## **8. GBV (SEA / SH) GRIEVANCES UPTAKE CHANNELS**

The GM system includes specific procedures for SEA/SH grievances including confidential reporting and ethical documentation of GBV cases. Channels to accept and respond to GBV grievances will be communicated to the public and project workers during stakeholder engagement activities, inductions, consultations and throughout project implementation. The GM will accept GBV related grievances through the available channels. Telephone information line, email address and procedures will be communicated to during consultations and induction sessions.

The GM will report any GBV grievances directly to the upper management and will be treated and resolved with uttermost confidentiality. In cases where survivors request legal actions and where physical abuse have occurred, the company will request the most appropriate referral channel through contacting SAWA organization at their hotline 121.

When reported through the GM, the following procedures will be followed;

- i- Accept the grievance/ complaint through the GM available channels.
- ii- Provide the complainant with the option of anonymity as described in section 7. And request their consent to be contacted by the GM focal point.
- iii- Notify company upper management and follow uttermost confidentiality.
- iv- Investigate internally and suggest the required resolution along with the survivor's consent.
- v- If the survivor decides to seek justice, under advise from SAWA and in cooperation with the Ministry of Women Affairs, the national referral system through the Ministry will be followed.
- vi- After referral, the GM focal point will follow up with the survivor to ensure proper care is provided to them, and to obtain feedback from the Ministry regarding the case for filing and closure.
- vii- Document the details and insert in the log.
- viii- Investigate the case and identify the source of issue to suggest preventive measures for such cases.

## **9. FILING GRIEVANCES**

- The complainant fills in the designated form in writing and signs it or fills it in electronically including all personal information and details of the complaint. If they wish for anonymity, they can tick the anonymity box. Complainants have the right to also omit their personal identification information, but they need to understand and be made aware that this will not allow the ES coordinator to provide them with feedback regarding their grievance.
- The complainant encloses all copies of documents which may support the complaint.
- The E&S focal point will ensure that the form is filled in accurately. Once this is verified, an email/ SMS of acknowledgment with a reference number to track the complaint will be sent within 1 business day.

- If the complainant chooses to file his/her complaint verbally, the E&S focal point must register the complainant information and details of the complaint into the system. The complainant will receive a reference number to track his/her complaint.

#### **10. REGISTERING GRIEVANCES**

- The E&S Focal point will enter the complaint into the GM Tracking Matrix/log.
- The GM Tracking log tracks the status of all complaints.
- The GM Tracking log records the following information:
  - Complaint Reference Number
  - Date of receipt of complaint
  - Name of complainant (Optional)
  - Gender (Optional)
  - Confirmation that a complaint is acknowledged
  - Brief description of Complaint
  - Details of internal and external communication / Attachments
  - Action taken: (Including remedies / determinations / result)
  - Date of finalization of complaint
- Original documentation must be kept on file.

#### **11. EXAMINATION AND RESOLUTION OF GRIEVANCES**

Once the grievance has been verified as legitimate, the E&S Focal point will inform the complainant that an investigation is underway within **three business days**. The complainant shall be informed of the estimated duration for resolving the complaint, which is no later **than two weeks** from the date of receipt of the complaint. Where the complaint is unlikely to be resolved within the estimated duration, the E&S Focal point must promptly contact the complainant to request additional time and explain the delay. If the complaint is not resolved after the two-week period, the E&S Focal point will refer the complaint to management to take the proper measures.

#### **12. CLOSING GRIEVANCES**

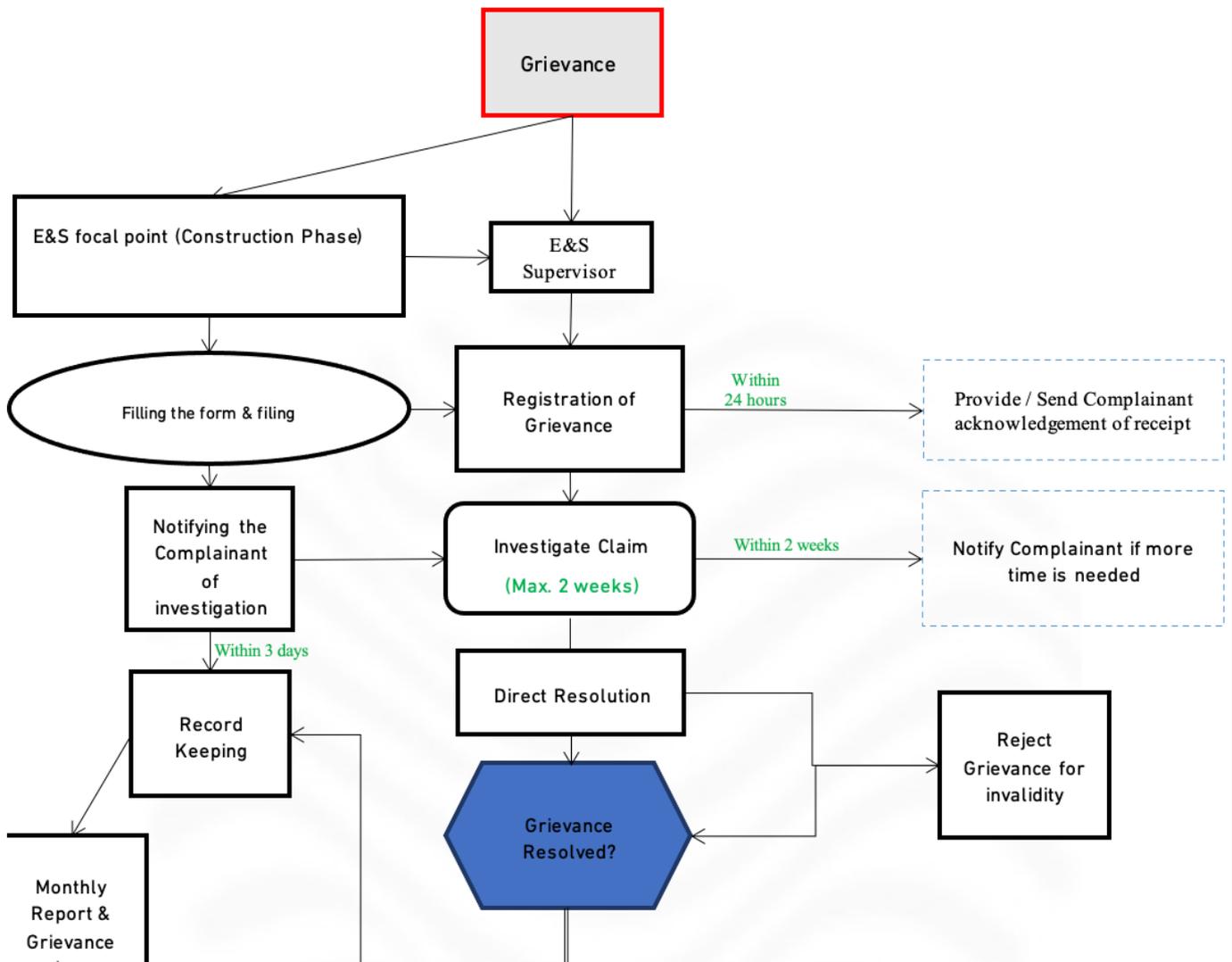
A complaint is closed in the following cases:

- Where the decision/solution of complaint is accepted by the complainant, the E&S Focal point shall close the complaint and sign the outcome and date in the Complaint Register.
- A Complaint that is not related to the project.
- A Complaint that is being heard by the judiciary.
- A malicious complaint.

#### **13. REPORTING**

The E&S Focal point shall review the Complaints Register regularly for the purpose of supplying analysis and reports on complaints to management and to the F4J II Project through progress and Monitoring and Evaluation reports. The reports shall include the number of complaints received, managed and closed. It shall also include analysis of systemic and recurring problems. This will aid the project management in determining the cause of complaints and whether remedial action is warranted.

**14.GRIEVANCES MANAGEMENT SCHEME**



1. طلب تقديم شكوى

التاريخ:.....

رقم الشكوى: .....

القسم الأول: حول المشتكي/ة

اسم مقدم/ة الشكوى الرباعي (اختياري):

رقم الهوية:

لا مانع من الكشف عن هويتي (نعم \ لا) - (لا: سيتم إحالة الشكوى للدوائر المختصة على أنها من مجهول)

اسم المؤسسة مقدمة الشكوى:

الصفة: اعتباري شخصي وكيل وصي ولي

الجنس (للأفراد فقط): ذكر

انثى  /  
تاريخ الميلاد: / /

العمر (للأفراد فقط): .....

رقم الهاتف:

البريد الإلكتروني:

**القسم الثاني: حول الشكوى**

موضوع الشكوى:

.....  
.....

الجهة المقدم بحقها الشكوى:

.....  
.....

- هل الشكوى منظورة أمام القضاء: نعم  لا
- هل تقدمت بشكوى في ذات الموضوع سابقا: نعم  لا
- اسم الجهة المقدم بحقها الشكوى سابقا: ..... تاريخ التقديم: ...../...../.....
- هل تلقيت ردا على الشكوى السابقة: نعم، تاريخ الرد: ...../...../..... لا
- وقائع الشكوى:

.....  
.....

**القسم الثالث: مرفقات الشكوى (وثائق ومستندات)**

- 1- .....  
2- .....  
3- .....

أقر وأصرح انا مقدم/ة الشكوى..... بأن المعلومات والبيانات والمرفقات الواردة أعلاه هي معلومات وبيانات ومرفقات صحيحة وحقيقية والتزم واتعهد بتحمل كامل المسؤولية القانونية فيما لو تبين خلاف ذلك في أي وقت من الأوقات أو إذا تبين أن الشكوى المقدمة من قبلي كيدية.

وعليه أوقع

توقيع و/أو بصمة مقدم/ة الشكوى: ..... تاريخ تقديم الشكوى: / /

توقيع و/أو بصمة الشخص الذي استعان به مقدم الشكوى في كتابة الشكوى: .....

اسم الموظف/ة مستلم/ة الشكوى: .....

توقيع الموظف/ة مستلم/ة الشكوى: ..... تاريخ استلام الشكوى: / /

**القسم الرابع: (خاص لاستخدام مسؤول الشكاوى)**

التوصية حول الشكوى: .....

.....  
.....

قبول الشكوى

رفض الشكوى

- مبررات رفض الشكوى: .....

التاريخ:

مسؤول

لشكاوى

التوقيع.....

## 2. ابلاغ رد لمقدم الشكوى

التاريخ:.....

الأخ / الأخت / السادة مؤسسة.....المحترم/ المحترمة/ المحترمين

الموضوع: ابلاغ رد حول الشكوى رقم ( )

تحية طيبة وبعد،

تهديكم شركة الوفاء للصناعات البلاستيكية اطيب التحيات، وبناء على متابعة الشكوى رقم ( ) المقدمة من طرفكم بتاريخ...../...../..... وموضوعها ....., نود ابلاغكم بالرد الاتي:

مع فائق الاحترام والتقدير

مسؤول الشكاوى



## 3. سجل الشكاوى

الرقم	رقم الشكاوى كما في النظام	مقدم الشكاوى	مستلم الشكاوى	الجنس (M/F)	تاريخ تقديم الشكاوى	حالة الشكاوى	تفاصيل حالة الشكاوى	موضوع الشكاوى	جهة المتابعة	تاريخ اغلاق الشكاوى	طريقة الاستلام	جهة الاختصاص	طبيعة الرد	ملاحظات
1						مقبول	قيد المتابعة							
2						مرفوض	متعثرة							
3						مقبول	مرفوض							
4						مقبول	مغلق							
5														
6														
7														
8														

- SIMPLIFIED ARABIC BROCHURE

### أنشطة المشروع

سيتم من خلال مشروع التوسعة التابع لشركة الوفاء للصناعات البلاستيكية انشاء مبنى جديد ضمن مقر الشركة وتركيب خط انتاج جديد بتكنولوجيا التشكيل الحراري حيث ستتضمن أنشطة المشروع ما يلي:

- 1- انهاء اعمال تشطيب المبنى الجديد وما يصاحبه من اعمال وصل وشبك الخدمات والبنية التحتية
- 2- تركيب خط الإنتاج الجديد
- 3- تجريب خطوط الإنتاج ووحدة المعالجة

اما مرحلة التشغيل فتتكون من:

- 1- شراء وتخزين المواد الأولية
- 2- بناء القدرات والتدريبات
- 3- تشغيل الخطوط والبدء بالإنتاج

### الاية الشكاوى

بناء على قرار مجلس الوزراء رقم 8 للعام 2016 وبالتوافق مع السياسات الاجرائية للبنك الدولي، توفر هذه الالية الحق في تقديم أي شكاوى او استفسار او رأي لأي شخص طالما تتعلق بالمشروع او أحد مكوناته او انشطته.

### الشكاوى غير المنظور اليها

- الشكاوى الغير متعلقة بالمشروع او أحد مكوناته او انشطته
- الشكاوى المنظورة امام القضاء او المحاكم او هيئات التحكيم
- الشكاوى الخالية من الصحة

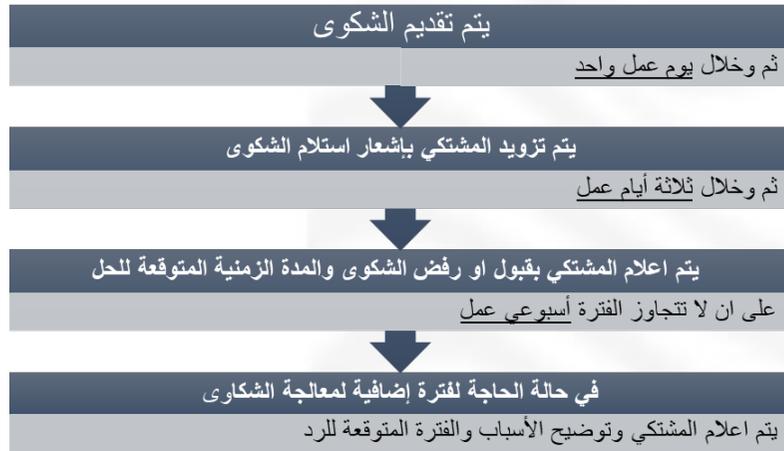


## شكاوى العنف المبني على النوع الاجتماعي

يستقبل النظام أي شكوى متعلقة بالعنف القائم على النوع الاجتماعي او العنف والتحرش او الاستغلال الجنسي. حيث يتم توفير السرية الكاملة للمشتكي ويتم تحويل الحالة لمؤسسات خاصة تعنى بحالات العنف المبني على النوع الاجتماعي.

### سرية المعلومات

يحق للمشتكي/ة، كما ينص نموذج الشكاوى، بطلب عدم مشاركة هويته\ها، حيث يتم تحويل الشكاوى على انها من مجهول. ويحق أيضا للمشتكي/ة بعدم الادلاء بمعلوماته\ها، ولكن في هذه الحالة لن يكون من المستطاع الرد على المشتكي/ة بخصوص حالة او نتيجة شكواه\ها.



### كيفية تقديم شكوى الى الشركة؟؟؟

- عن طريق الايميل arine.nd@wpi.ps
- عن طريق الحضور الشخصي الى الشركة:  
مصنع الوفاء للصناعات البلاستيكية، أبو دعبان، الخليل  
المهندسة : عرين ناصر الدين
- عبر الموقع الالكتروني: <https://www.wpi.ps/en/contact-us>
- عن طريق الفيسبوك عبر الرابط التالي:  
<https://www.facebook.com/Alwafa.Plastic.Industries>
- عبر الهاتف: +972 594594993
- من خلال تعبئة الشكاوى وايداعها في صندوق الشكاوي في الشركة