



**Finance For Jobs**  
استثمار وفرص عمل

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## **Environmental & Social Review and Audit for Four Investment Projects Supported by F4J**

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F4J  
Ramallah-Palestine

**Final report on  
Environmental & Social Review and Audit for Four  
Investment Projects Supported by F4J**

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## List of Abbreviations

|        |                                                     |
|--------|-----------------------------------------------------|
| CoC    | Code of Conducts                                    |
| EMA    | Environmental Monitoring and Audit                  |
| EQA:   | Environmental Quality Authority                     |
| ER:    | Emergency Response                                  |
| ESRA   | Environmental and Social Review and Audit           |
| ESIA   | Environmental and Social Impact Assessment          |
| ESMP:  | Environmental and Social Management Plan            |
| ESMS:  | Environmental and Social management System          |
| FTTH   | Fibre to-the-Home                                   |
| F4J    | Finance for Jobs                                    |
| GBV:   | Gender Based Violence                               |
| GRM    | Grievance Redress Mechanism                         |
| HEPCO  | Hebron Electric Power Company                       |
| HS:    | Health and Safety                                   |
| IFC:   | Investment Co-Financing Facility                    |
| JAIP   | Jericho Agro-Industrial Park                        |
| JDECO: | Jerusalem District Electricity Distribution Company |
| MoE:   | Ministry of Education & Higher Education            |
| MoF    | Ministry of Finance                                 |
| NEDCO  | Northern Electricity Distribution Company           |
| OHS:   | Occupational Health and Safety                      |
| PIA    | Project Implementation Agency                       |
| SEH    | Sexual Exploitation and Harassment                  |

# **I.Executive Summary**

## **I.1 Background**

Launched in 2017, the Finance for Jobs (F4J) project aims to promote job creation in Gaza and the West Bank by encouraging private investment in promising industries. Funded by the World Bank (WB) and overseen by DAI, the Project Implementation Agency (PIA), on behalf of the Ministry of Finance (MoF), F4J comprises two main components: the Development Impact Bond (DIB) and the Investment Co-Financing Facility (ICF).

Despite the emphasis on skills development and employment opportunities, there are risks of environmental and social exclusions. These risks encompass environmental impacts, institutional arrangements, exclusion of specific locations, incidents of gender-based violence, sexual exploitation, and harassment (GBV/SEA/SH), labour conditions, community health and safety, and inadequate stakeholder engagement. To address these concerns, DAI, as the implementing agency, requests the audit and monitoring consultant to select 10% of funded subprojects (up to four projects) each quarter for Environmental and Social Review and Audit (ESRA). This process ensures that the subprojects comply with the ICF regulations and World Bank Policy OP/BP 4.01.

## **I.2 Audit Scope and Objectives**

### **I.2.1 Audit Scope**

Following the inception meeting on April 29, 2024, it was decided to select a sample of four subprojects out of 11 active F4J ICF subprojects in the West Bank for an ESRA (see section 1.3 for the methodology used in the selection). The F4J team provided the essential project documents, including the subprojects' award agreements, initial environmental examinations, E&S screening reports, Environmental and Social Management Plans (ESMPs), and the latest audit and monitoring reports. Additional information was collected from the focal points of each subproject during and after site visits conducted by the auditor.

### **I.2.2 Objectives**

The objective of this Environmental and Social Review and Audit (ESRA) is to provide F4J team with a clear indication of the environmental and social performance of the project for the period covered by the audit from the effective date of signing the agreement of the project until June 2024. Hence, this assignment's goal is to confirm the level of compliances of the World Bank Policy OP/BP 4.01, ESIA's, ESMPs, sound environmental health and safety management practices and Grievance Redress Mechanism (GRM) are being applied and followed by the projects. It also aims to:

- Ascertain whether pertinent mitigation measures presented in the project's ESMP have been identified and put into place during the planning, execution, and operation of projects.
- Identify opportunities and make recommendations for improvements in environmental performance of the project or facility.
- To ensure the fulfilment of all commitments outlined in the most recent ESRA for the implementation of ESMP-related policies.
- Provide the information required to develop an Environmental and Social Corrective Action Plan (EAP) in the event of any significant findings of negative Environmental and social impacts.

Conclusions and recommendations drawn from this ESRA were discussed with each subproject's focal points and are presented to the F4J team, who will address the findings and apply the lessons learned from this and other assignments to future interventions as needed.

### **1.3 Methodology**

To accomplish the ESRA, the following methodology was adopted:

#### **1.3.1 Sample Selection**

To ensure a rational selection of projects for this ESAR cycle, the 11 subprojects were grouped into 4 subgroups based on the timing of recent monitoring reports, the business sector of the projects, project completeness, and the approval status of the ESMP. Based on these criteria, it was found:

- Al Yasmin Sweets project was categorised under category "C". It is currently under implementation and has only screening report and ESMP checklist, therefore, it was excluded from being a potential monitoring project in this round cycle.
- Bnet Telecommunications & Advanced Technologies project and it is under implementation and has screening report and ESMP checklist, therefore it is excluded as well from this round cycle.
- Al Hafeed Dairy Products project and Mhnna Co. project were excluded as their ESMPs are still under revision by the World bank.
- Al Wafa Plastic Industries Co. project was excluded as the supply of the thermoforming machine (which is the ICF grant support) is expected to be delivered in Q1 of 2025.
- The remaining 6 projects have screening reports, ESMPs and monitoring reports. Massader and Petra projects were completed, therefore and from the sustainability dimension both are selected to be audited and monitored. Massader Project focus on the installation of rooftop solar photovoltaic (PV) systems on public schools across the West Bank, whereas Petra project produces wide range of glass products and has already established regional recognition from major suppliers and was able to acquire the rights to market its products under several international brands. For Al Dalya project a portion of the cost of installing Y-stands for 140 donums are located in area C. The most recent environmental audit and monitoring for Al Dalya Project was completed in 2019. The project is not included in this cycle of audit and monitoring because there is a high risk that it will not be possible to visit the site due to the current political climate.
- Since Sanabel Al Naser project was audited and monitored in February 2024, it will not be included in this cycle of audits and monitoring. Out of the ongoing projects, BITC and MADA projects were audited and monitored in August 2022 and November 2023, respectively. BITC and MADA projects related to Agribusiness and ICT, respectively. In this monitoring cycle, these two ongoing projects are selected to draw lessons for expected future funded projects in same developing sectors.

#### **1.3.2 Approval of the potential subprojects**

After the inception report for this assignment was approved on May 27, 2024, Table I below outlines the subprojects chosen by the consultant for inclusion in the Q1 2024 audit and monitoring cycle. These selections, which were approved by DAI, were made following a review of all ongoing subprojects and include information on their respective sectors and geographic locations.

**Table 1.** Approved subprojects for the audit and monitoring ends.

| # | Sub project name and number | Location         | Sector                               | Available documents/instrument                                                                                    | Most recent M&E report |
|---|-----------------------------|------------------|--------------------------------------|-------------------------------------------------------------------------------------------------------------------|------------------------|
| 1 | BITC Garden Co.             | Jenin / Kafr Dan | Agribusiness (Pickling)              | <ul style="list-style-type: none"> <li>• Screening Report</li> <li>• ESMP</li> <li>• Monitoring report</li> </ul> | Aug 2023               |
| 2 | Petra Glass Co.             | Jericho          | Glass Industry                       | <ul style="list-style-type: none"> <li>• Screening Report</li> <li>• ESMP</li> <li>• Monitoring report</li> </ul> | Jan 2024               |
| 3 | MADA Al Arab Co.            | Ramallah         | ICT                                  | <ul style="list-style-type: none"> <li>• Screening Report</li> <li>• ESMP</li> <li>• Monitoring report</li> </ul> | Nov 2023               |
| 4 | Massader Co                 | Ramallah         | Solar PV (Public Schools Rooftop PV) | <ul style="list-style-type: none"> <li>• Screening Report</li> <li>• ESMP</li> <li>• Monitoring report</li> </ul> | Aug 2022               |

### 1.3.3 Documents review

For each selected subproject, a comprehensive desktop review of its documents was conducted. This review encompassed, but was not limited to, the project's award agreement, the initial E&S screening assessment report, the ESMP, previous audit and monitoring reports, recommended follow-up actions from prior audits, grievance mechanism, CoC, workers' contracts, correspondence with relevant authorities and stakeholders, and the project's award agreement. Additional supporting documents were obtained from the project's focal point as needed.

### 1.3.4 Field Visit

The F4J project manager sent a letter to all project focal points, kindly requesting their assistance and cooperation with the consultant representing F4J. The consultant will be reviewing and auditing each project's compliance with ES safeguards, ESIA's, ESMPs, and sound environmental health and safety management practices.

The consultant contacted each project's focal point to arrange times for field visits, as detailed in Table 2. Field visits were conducted at project locations to confirm local environmental and social compliance. During these visits, the consultant met with the project proponent and operational manager to understand the current project status, achievements, and obstacles encountered during the monitoring cycle.

The field visits included:

- Actively monitoring the project site (supported with photos) to evaluate compliance with established environmental and social standards and the corrective actions presented in the previous monitoring reports.
- Recording any positive or negative environmental and social impacts observed during the sub-project's construction and implementation phases.
- Checking the subproject's compliance with institutional arrangements and E&S management.
- Conducting meetings with project workers and stakeholders if required.

The extent, nature, and possible effects of the observed impacts on the local community and environment were thoroughly documented for further elaboration in the final report. Special attention was given to labor conditions, occupational health and safety, and the current grievance procedure, including received and handled grievances.

These field visits provide first hand insights into the actual implementation on the ground and allow for the verification of compliance with environmental and social requirements.

**Table 2.** Site visit schedules, along with the date of drafting audit findings and recommendations for each project and further communications with focal points

| # | Sub project name and number | Location of subproject | Provisional schedules of site visit | Revised Audit Report Findings and Recommendations Date - Subproject Focal Point Review |
|---|-----------------------------|------------------------|-------------------------------------|----------------------------------------------------------------------------------------|
| 1 | BITC Garden Co.             | Jenin / Kafr Dan       | 25/5/2024                           | 22/6/2024                                                                              |
| 2 | Petra Glass Co              | Jericho                | 30/5/2024                           | 18/6/2024- 20/6/2024                                                                   |
| 3 | MADA Al Arab Co.            | Ramallah               | 6/6/2024                            | 1/7/2024- 3/7/2024                                                                     |
| 4 | Massader Co                 | Nablus                 | 13/6/2024                           | 8/7/2024- 10/7/2024                                                                    |

### 1.3.5 Meetings with stakeholders and relevant entities

The consultant conducted meetings, both remotely and in person, with project stakeholders and relevant entities to gather comprehensive information on the implemented project activities and beneficiaries. These meetings served as platforms to engage with key stakeholders, including local communities, governmental agencies, non-governmental organizations (NGOs), and other relevant entities. Through these interactions, the auditor gathered insights into various aspects of the subprojects, including their institutional, environmental, and social dimensions. The consultant then compared this information with observations made during the field visits. The consultant reached out to workers from the subprojects to verify findings from meetings with the respective subproject's focal point. Each draft report was then sent to the focal point in charge for review and feedback on any issues highlighted in the report. To ensure the accuracy of the information gathered, meetings were audio recorded with the attendees' permission. During the audit site visits, several stakeholders were engaged. The following table, Table 3, outlines the key issues discussed with the stakeholders to ensure compliance with these subprojects.

**Table 3.** Names of Subprojects and Issues Addressed

| Subproject      | Method of contact      | Key issues discussed                                                                            | dates      |
|-----------------|------------------------|-------------------------------------------------------------------------------------------------|------------|
| BITC Garden Co. | Online interview       | Regulatory Oversight and Environmental Health Monitoring in Factory Operations                  | July 2024  |
| Petra Glass Co. | Face to face interview | Status of the environmental approval granted by EQA to Petra Glass Co.                          | 02/06/2024 |
| Massader PV     | Face to Face Interview | Environmental clearance status of school roof projects                                          | 16-6-2024  |
| MADA Al Arab    | Face to Face interview | Issues related to occupational health and safety and disturbances resulting from worker actions | 6/6/2024   |

### 1.3.6 Compliance with Project's Safeguard Requirements

Through site visits and meetings with focal points for each subproject, comprehensive evaluations were conducted to ensure compliance with subproject safeguards and national Environmental and Social (E&S) guidelines as outlined in each subproject's Environmental and Social Management Plan (ESMP). Deviations from these guidelines were closely examined, with inconsistencies and areas of non-compliance identified. Significant deviations prompted the proposal of corrective actions and immediate steps. Findings and recommendations were discussed with each subproject's focal point and used to prepare action plans. These details were documented in the environmental and social monitoring report for each subproject. Additionally, a detailed action plan was developed to enhance

facility environmental, health, and safety standards, outlining steps to achieve medium- and long-term compliance goals.

### **1.3.7 Assessing and Enhancing Grievance Redress Mechanisms (GRM) for Subprojects**

The grievance mechanism for each subproject was thoroughly scrutinized. This included verifying the process to ensure stakeholders could easily access and use the grievance mechanism and evaluating the clarity of the complaint filing process and communication channels. Any non-compliance or deficiencies were raised with the project's focal point, with recommended actions included in the environmental and social monitoring report. The verification and recording of the effectiveness of the Grievance Redress Mechanism (GRM) were discussed with the subproject's focal point. Recommendations for enhancements to improve the effectiveness and efficiency of the grievance process were also discussed.

## **1.4 Gap Findings**

The assessment of the subprojects showed differing levels of compliance in institutional arrangements, physical environment management, and social environment aspects among the four subprojects. Below is a summary of the gap findings for each subproject.

- **BITC subproject**

For BITC's E&S compliance, the project is advancing as planned despite some challenges. Quarterly ICF reports show that while institutional arrangements are partially adequate, with clear structure and organization evident from the BITC director's reports, execution and management remain notably weak. In the BITC director's quarterly reports to the IFC, it is evident that BITC did not fully comply with the ESMP requirements, attributing this to seasonality. The IFC report notes that while the BITC board approved and hired an Acting General Manager, a Marketing and Sales Manager, an Operations and Maintenance Officer, and a Production Supervisor, no Environmental and Social (E&S) Officer was appointed. Additionally, no training sessions were conducted for workers, and no external consultations were held to address the wastewater issue.

In terms of physical environmental impacts, BITC has installed storage tanks for treating and reusing washing water before it is sent to the septic tank. However, despite having an external health officer, the company has not produced key documents such as the Occupational Health and Safety Plan (OHS), Emergency Response Plan (ERP), and Hazardous Waste Management Plan.

Regarding social environment compliance, the company has demonstrated relatively adequate adherence but needs to implement several measures to improve compliance with the ESMP and E&S audit conducted in May 2021. These measures include activating grievance mechanisms for both the public and workers, submitting E&S monthly reports, maintaining a well-organized worker record system, providing OHS training and orientation, and circulating a Code of Conduct (CoC).

- **PETRA subproject**

During Q1- 2024, PETRA made notable progress in adhering to environmental and social (E&S) good practices, ESMP mitigation measures, and audit recommendations across institutional arrangements, physical environment management, and social environment compliance, compared to the baseline and previous audit reports.

Regarding institutional and management arrangements, the company has implemented a new bylaw adjusting work schedules to 10 hours a day with a one-hour break, five days a week (amounting to 45

hours per week). This change demonstrates proactive efforts towards regulatory compliance and enhancing worker well-being. PETRA has also installed a new furnace to increase production capacity and acquired a press filter to address wastewater issues, although it is yet to be installed. However, the company still lacks a well-developed Grievance Redress Mechanism (GRM) system. Despite notable improvements, such as obtaining ISO 9001 certification and a certificate from the Israel Standards Institute, as well as significant progress in establishing Occupational Health and Safety (OHS) protocols, PETRA's institutional compliance requires further enhancement and can be considered only partially satisfactory.

For the physical and social environment, PETRA has made progress by appointing an OHS officer and an ES focal point to oversee the development of the GRM system with an appointment effective from October 15, 2023. While the company has acquired all required Personal Protective Equipment (PPE), such as safety helmets and gloves, compliance among workers is inconsistent. Although most workers use safety gloves, few wear safety helmets, highlighting ongoing safety concerns. The newly formed OHS committee is expected to improve PPE usage and overall adherence to the OHS plan.

During an audit visit, it was noted that the plant's production machines had warning text sheets but lacked proper warning signs. Additionally, excess glass disposal by the glass clipper operator was unsafe, leading to scattered glass around the machine, a concern raised with the OHS Officer. Walking areas within the production area are overcrowded and need to be marked to prevent incidents. The floor in the double glass production area is contaminated with silicon and grease and requires daily cleaning. The OHS Officer has been informed of these issues.

Outside the factory, scattered broken glass was observed near the glass container. The OHS Officer explained that this waste is disposed of via municipal containers due to the absence of local glass recycling facilities. The glass washing water stream contains glass powder, which is currently managed with primitive basins not connected to all sewers. Although a press filter was purchased to address this, it has not yet been installed. Additionally, there are no records of solid waste generated by the plant.

All factory machines operate with an automation system, enhancing work efficiency and reducing injury risks due to human error. A detailed discussion on safety measures was held with the OHS Officer, and the specifics are included in the recommendations section. Significant strides have to be made in establishing and implementing Occupational Health and Safety (OHS) protocols.

Overall, PETRA's compliance with physical environment and safety considerations is unsatisfactory.

The PETRA factory provides significant socio-economic benefits to the local community and stakeholders by offering employment opportunities, contributing to economic stability, generating revenue, paying taxes, and stimulating the local economy through procurement and supplier relationships. Consequently, PETRA's compliance with social and environment standards is considered satisfactory.

Based on the findings, further improvements in institutional arrangements, physical environment management, and social environment compliance are deemed essential.

- **MADA Subproject**

In Q3 2023, significant progress has been made in MADA's fiber network expansion, resulting in nearly complete coverage across various regions in the West Bank.

Due to the current political situation, there is an urgent need to connect areas near Salfeet to ensure comprehensive coverage and support for the local population.

MADA has shown significant improvement and adherence to previous corrective actions listed in Q3 2023 MADA Al Arab E&S monitoring report. In Q1 2024, MADA has undertaken significant institutional arrangements and measures. The company has expanded its workforce with many hires, bringing the total number of staff under the FTTH project to 432 and have 62 contractors in addition to 520 distributors. These exceed the planned figures. The company has provided a simplified ESMP brief to its employees via the company portal <https://MADA.ps/ar/>. In response to prior corrective actions, the Code of Conduct (CoC) has been circulated and signed by new hires. In this quarter, the company introduces its Grievance Mechanism (GM) on its website. This includes clear disclosure and effective channels. Additionally, the company has established reporting measures for environmental and social aspects. While the company demonstrated impressive efforts in the development of training courses on Occupational Health and Safety (OHS), communications skills and customer related subjects. Overall, MADA's performance in Q1 2024 is satisfactory,

TrioTech company diligently followed up on all environmental and social impacts of MADA's activities, particularly concerning the underground installation and network expansion. While MADA's operations generally posed low environmental risks, MADA and its contractors have shown satisfactory compliance with environmental mitigation measures, implementing corrective actions effectively without major breaches of the ESMP or local laws and regulations. Therefore, the company conducts a survey of the work area before the subcontractor begins. Environmental and social issues are promptly addressed by instructing the contractor to provide daily debris collection and proper disposal with continuous monitoring to mitigations measure. Potential air quality concerns due to dust were mitigated, and noise and nuisance impacts were managed through communication with the local council. Overall, MADA demonstrated satisfactory compliance with environmental mitigation measures, ensuring minimal to low impacts on various environmental aspects, contingent upon continued adherence and monitoring. Additionally, institutional commitments were substantially satisfactory, with areas for improvement identified in GM implementation and CoC circulation.

Overall, the company's environmental and social compliances have significantly improved, leading to a satisfactory rating for both physical and social environment compliance.

- **Massader Subproject**

The installation of photovoltaic panels at the two schools' rooftops by Triple K Solar, a subcontractor of Massader, exemplifies strong adherence to institutional arrangements and effective environmental and social management practices. Prior to installation, engineers conduct comprehensive site assessments to address environmental conditions and develop effective mitigation strategies, ensuring minimal impact on local communities and the environment. Quarterly internal reports emphasize the company's dedication to transparency and sustainability, documenting E&S assessments and corrective actions from previous monitoring. To uphold ethical standards and foster a positive work environment, Massader and its contractors provide induction workshops for all workers, introducing them to the Code of Conduct (CoC) and ensuring compliance through signed agreements. Comprehensive OHS plans include extensive training and supervision to ensure employee safety, with regular health inspections and adherence to medical clearance requirements enhancing worker well-being.

Massader and its contractor have significantly enhanced the project's E&S commitments and ESMP mitigation measures during Q4 2023 and Q1 2024, demonstrating strong adherence to these standards as well as to corrective actions from previous monitoring periods.

The company operates with a dual focus on Environmental & Safety (E&S) and Occupational Health & Safety (OHS), alongside Governance, Risk Management (GRM). Prior to commencing installations, their engineers conduct thorough site assessments to evaluate environmental conditions and devise effective mitigation strategies. This approach ensures minimal impact on local communities and the environment. Quarterly internal reports underscore the company's commitment to transparency and sustainability, detailing E&S assessments, and corrective actions from previous monitoring periods.

A site visit revealed that the installation of photovoltaic (PV) systems on school rooftops, made of concrete and waterproof materials generates a small amount of dust from drilling which was promptly contained and collected. The paved surrounding roads prevent dust from material transport, and the limited volume of materials and small workforce keep vehicle emissions low.

Noise and vibrations are not an issue as construction occurs during summer vacations when schools are empty, and the nearest residential house is 30 meters away, reducing noise impact. There were no traffic disruptions or road safety concerns observed, as both schools are located away from main roads and Al Hussein Elementary High School has completed panel transportation.

There are no anticipated visual impacts as all construction materials are properly collected and stored. The project's work is confined to rooftops, with no impact on biodiversity, surface, or underground water resources. Water use is minimal due to the small number of workers (6 per site), who use the school's facilities, generating no wastewater.

The construction activities are unlikely to significantly affect public utilities and services due to their limited scale and small workforce.

Massader's adherence to environmental and safety standards is fully satisfactory.

The project has demonstrated a strong commitment to worker safety, community engagement, and socio-economic development. Comprehensive Occupational Health and Safety (OHS) policies, including the provision of personal protective equipment (PPE) and regular training sessions, have created a safe working environment for all personnel. Additionally, protective fencing and safety wiring on rooftops help mitigate risks associated with overhead installations.

The project has positively impacted local communities by generating direct employment opportunities and stimulating economic activity through local procurement. Each installation phase involves an average of three workers daily over ten working days, underscoring Massader's dedication to enhancing livelihoods and supporting local businesses. Therefore, the social environment compliance can be considered more than satisfactory.

Comprehensive recommendations and measures have been devised for all subprojects in section 3. These aim to help the compliant subprojects sustain their current standards and assist the partially compliant subprojects in achieving full compliance. By following these recommendations, both noncompliant and compliant subprojects can align their operations with the required standards, ensuring overall project success and sustainability.

## **2. Subprojects Descriptions**

As mentioned above four subprojects funded by F4J were audited in this cycle. Follows are descriptions of each subproject.

### **2.1 Subproject I BITC Garden Agricultural Marketing Company**

Since the preparation of the Project's E&S Audit and ESMP for the proposed expansion, there have been two E&S monitoring activities, the most recent on August 6, 2023. This document is the third E&S M&E report for the BITC project. Over the period from mid-2023 until May 2024, the company has witnessed substantial progress in terms of expanding its operations and achieving its development plan for 2023.

For the first quarter ending April 30, 2024, BITC completed several activities in relation to its development plan, particularly the supply, installation, and commissioning of a plastic processing line under RFB NO. BITCBIC001/22. This included a thermoforming packaging machine, a jar sealing machine, an automatic security band sleeve machine, and a cucumber sorting machine. The Request for Bidding (RFB) was prepared and announced by BITC Garden for Agricultural Marketing LTD, receiving submissions from two local suppliers and one international supplier. The Bid Evaluation Committee (BEC) reviewed the bids and recommended awarding the bid to LGC Muhendislik Ithalat Ihracat A.S. After receiving DAI's technical representative's no objection to the contract on November 13, 2022, the fabrication process began in March 2023. Efforts to supply and install the cucumber sorting equipment within the cucumber season (April 15 - July 15, 2023) were unsuccessful due to late initial payment to the supplier by BITC and logistical issues, including holidays and changes in shipping schedules. Although the equipment was received and installed in the third quarter of 2023, it could not be used due to the seasonality of cucumber harvesting.

In the first quarter of 2024, the thermoforming equipment was shipped, and arrangements for installation were made, including issuing a visa for the supplier technician. However, BITC faced export restrictions from the Turkish government on thermoforming raw materials needed from Turkey to Israel. The required plastic sheets (80 and 550 microns) are not available in the local market. In May 2024, BITC expected to receive the Jar Sealing Machine and the Automatic Security Band Sleeve Machine, which were ready and in the process of shipping.

To optimize manufacturing processes, BITC redesigned the arrangement of machines, work areas, and service areas within the plant. During the first and second quarters, BITC completed various activities, including transferring the equipment for preparing the solution and pumping it out of the production hall and constructing a suitable hall behind the factory. They also built a 350 m<sup>2</sup> hall for the cucumber sorting line and a 130 m<sup>2</sup> warehouse with an average temperature of 22°C. Additionally, they leveled, paved, and asphalted a 618 m<sup>2</sup> yard to accommodate production barrels, installed a plant gate and leveled the entrance, installed a different water network for water reuse, purchased a used electric forklift, and installed a hydraulic unit to control the vibrator unit level. Furthermore, they extended the scandium pipe network for steam equipment for brine heating, upgraded seven motors and gears to achieve higher production speed, increased the main electricity supply from 100 A to 150 A, installed steam pipe insulation, and completed the installation of PLC for the filling section, a heating management system for the liquids, and a chiller for cooling pasteurization water and thermoform molding.

During a site visit on May 25, 2024, BITC secured the supply of cucumbers and baby cucumbers, marking the first day of production. The company plans to initiate production lines for other varieties

such as carrots and hot peppers. Additionally, BITC aims to diversify its product range by introducing vinegar and white cheese. The white cheese will not be produced on-site; instead, fresh white cheese will be purchased from local farmers, curated at the factory, packaged, and sold.

## **2.2 Subproject 2: PETRA Glass Factory Expansion – Glass Manufacturing Furnace**

The Petra Glass Factory is a leading glass manufacturer in Palestine and Israel, specializing in remanufacturing glass to meet the needs of end-users. The factory offers a diverse range of products, including double-glazed windows for homes, glass facades for commercial complexes, shower enclosures, and balustrades. The company is renowned for its high-quality products and exceptional customer service.

The factory operates two shifts daily from Saturday to Thursday, with both laminating and tempering furnaces installed and functioning smoothly. Over the past nine months, significant progress has been made. The delivery of raw materials has been completed, and the double chambers machine has successfully finished the insulation phase and is now operational with observation. Additionally, sixteen new employees have been hired following a series of interviews.

Further progress has been noted in the past three months, with the double chambers machine becoming fully operational. Despite these advancements, client movement has been slow due to various circumstances.

During a recent site visit, discussions were held with key personnel, including the operational manager, OHS manager, company owner, and two workers, followed by a comprehensive tour of the production area. Throughout the reporting period, the company maintained its operations, producing a range of glass products tailored to customer specifications. Production saw a notable increase facilitated by the new furnace compared to the previous period when only a smaller furnace was in use.

Both the laminating and tempering furnaces, along with the raw float glass sheet inventory materials delivered during the previous monitoring cycle, are now operational. However, despite the new furnace installation, production capacity has not met the company's expectations, primarily due to ongoing political conditions. No significant changes to the factory layout were reported aside from the installation of the new furnace. A wastewater press filter has been purchased but is not yet installed.

Since the previous monitoring and audit, the company has hired two additional female administrative workers, with no new hires in production and operation roles. Currently, four female workers are employed across shift periods, primarily in data entry and accounts departments. Three days after the audit and monitoring visit, the focal point provided the auditor with a copy of the decision to appoint an occupational health and safety committee, which had been issued in October 2023. This letter had not been available on the day of the inspection.

## **2.3 Subproject 3: MADA FTTH**

This project involves the strategic planning, design, implementation, and maintenance of fiber optic networks across the regions of Ramallah & Al-Bireh, Jerusalem, Bethlehem, and Jericho. The project encompasses collaboration with engineers, technicians, and contractors to ensure successful deployment and operation of the networks.

The primary activities of the project include network implementation, marketing and sales, service installation, customer management, product lifecycle management, and operational administration. For

network implementation, the project strategizes, designs, implements, and maintains fiber optic networks in the specified regions. Marketing and sales efforts focus on actively promoting and selling fiber optic services to residential and business clients through various channels, including field sales, telesales, distributors, social media, marketing campaigns, and events. Service installation is executed by coordinating efforts between technicians and electricians to install fiber optic services in homes and businesses. Customer management involves overseeing the complete customer journey and satisfaction, leveraging support functions such as customer service, technical support, quality control, and back-office operations. Product lifecycle management covers the entire product lifecycle, including business development, IT, procurement, warehousing, finance, and other related aspects. Operational administration involves administering day-to-day operations in collaboration with various functions, including HR, finance, and administration, to ensure smooth business operations.

In the past three months, significant progress has been made. Fiber optic networks have been expanded in five additional areas within the designated regions, with planning completed for networks in six more areas. Approximately 150 kilometres of fiber optic cables have been deployed across the regions, connecting around 1,800 households (FTTH - Fiber-to-the-Home) and approximately 150 business entities to the fiber network. All activities were completed according to the planned schedule, aligning with the business plan.

The procurement process for the ICF grant-supported items, including contractors, contract amounts, procurement status, and delivery, was handled by the Jerusalem District Electricity Company (JDECO). Operational achievements include planning fiber optic networks in five new areas, designing networks in six new areas, installing approximately 150 kilometres of fiber optic cables, and adding 1,800 FTTH customers and around 150 business customers to the network. No grants, loans, or technical assistance were received from other sources or donors in the past three months.

#### **2.4 Subproject 4: Massader Schools rooftop PV solar**

Massader's rooftop solar PV program is an initiative aimed at installing solar PV systems on the rooftops of 330 public schools in Palestine. This program is a collaboration between Massader and the Ministry of Education & Higher Education (MoEHE). Under the agreement, Massader will use the school rooftops for solar energy production, with 18% of the generated energy allocated as energy credits for the Ministry, while the remaining 82% will be sold to distribution companies through Power Purchase Agreements (PPAs).

The project addresses the critical issue of energy scarcity in the Palestinian Territories, a significant barrier to economic development. By implementing this program, Massader promotes renewable energy, fosters a green culture among students, and reduces electricity costs for schools. Additionally, the project is expected to create approximately 250 jobs in the West Bank, where unemployment rates are notably high. Utilizing existing rooftops for solar panels also helps preserve valuable land for other uses, such as agriculture. The total planned capacity for the project is approximately 20 Mega Watt peak (MWp), making it a pioneering national effort in renewable energy development.

During the past three months, significant progress has been made according to the implementation plan:

Batch 1: Managed by JDECO and HEPCO, all 31 schools have achieved 100% construction and grid connection progress.

Batch 2: A contract was signed with the Joint Venture of Arab Brothers and Al Mustaqbal for a total capacity of 2.8 MW across 40 schools under Jerusalem Electricity Distribution Company (JEDCO).

The project commenced on February 25, 2021, with 2,804 kWp of rated capacity installed. All plants are operational and in their first year of the Defects Notification Period (DNP).

Batch 3: The contract with KAWAR Energy began on January 25, 2022. The project, with a total capacity of 1.6 MW, has completed all design, mechanical, and electrical works, with all 40 schools now connected to the grid and in the Operations and Maintenance (O&M) stage.

Batch 4: The contract with the JV of 3K Solar and Abaad Contracting. With a capacity of 1.9 MW, construction and takeover have been completed for all schools, and the batch is now in the O&M phase.

Batch 5: Signed with the JV of Arab Brothers Company and Mustakbal Cleantech Company. The capacity was upgraded from 2.668 MW to 3.364 MW. By the end of March 2024, 33 schools were connected to the grid, with the remaining construction expected to be completed in the upcoming quarter. Managed by NEDCO with 54 schools, this batch shows a construction progress of 90% and a grid connection progress of 67%.

Batch 6: The contract with the JV of Arab Brothers Company and Mustakbal Cleantech Company saw a reduction due to the elimination of sections. The project, with a capacity of 2.178 MW, commenced on June 28, 2022, and is currently in progress.

Batch 7: On October 19, 2022, Massader signed a contract with Abaad Contracting Company. The capacity was adjusted from 2.317 MW to 2.427 MW. Take-over was completed for 27 sections during the reporting period, with the remaining sections expected to be completed in the next few months.

Batch 8: The contract was signed on May 4, 2023. The capacity was upgraded to 2.48 MW. PV modules were installed for 30 sections, with grid connection expected to begin in the upcoming quarter.

### 3. Institutional Arrangement and Environmental and Social Compliances and Recommendations.

In this section, for each subproject, we present findings related to its compliance with institutional arrangements, as well as environmental and social standards. This is followed by recommendations to be implemented by the subproject in the upcoming audit cycle.

#### 3.1: BITC Subproject

##### 3.1.1 Institutional Arrangement and Management

Key Achievements (Q1 2024): BITC has made notable progress in the supply, installation, and commissioning of critical machinery for its plastic processing line, including thermoforming packaging, jar sealing, automatic security band sleeve, and cucumber sorting machines. Despite some logistical challenges, significant equipment installations were completed by Q1 2024. Since the preparation of both the Project's Environmental and Social (E&S) assessment and the Environmental and Social Management Plan (ESMP) for the proposed expansion, two E&S monitoring activities have taken place, the most recent on August 6, 2023. This document serves as the third E&S Monitoring and Evaluation (M&E) report carried out by DAI consultants for the BITC project covering significant operational and infrastructural advancements from mid-2023 to May 2024.

Operational Enhancements: Several modifications have been made to optimize manufacturing processes, including:

- Construction of new halls for sorting and storage.
- Installation of upgraded machinery and infrastructure improvements.
- Enhancements to production speed and efficiency.

Production and Diversification: BITC commenced cucumber Pickles production on May 25, 2024, and plans to expand its product range to include carrots, hot peppers, vinegar, and white cheese sourced from local farmers.

Environmental and Social Governance: While BITC has appointed an E&S Focal Point, gaps in ESMP dissemination, policy development, and compliance monitoring persist. The company needs to enhance training, awareness, and implementation of its environmental and social policies.

Occupational Health and Safety (OHS): Safety inspections revealed significant concerns, including inadequate fall protection and ergonomic deficiencies. There is an urgent need for a comprehensive OHS plan tailored to the unique hazards of pickling operations.

##### Recommendations:

1. Issue an appointment letter for the official E&S focal point and declare his responsibilities.
2. Conduct orientation sessions for all workers, providing training and support on E&S matters.
3. Develop and ratify an environmental policy by the company's management.
4. Conduct bi-annual E&S audit meetings and create logs documenting main findings and follow-up actions. This is to ensure ongoing compliance with environmental and social regulations, identify any issues or areas for improvement, and track progress on follow-up actions. These meetings help in assessing the effectiveness of E&S practices, addressing any non-compliance or risks, and ensuring that corrective measures are implemented in a timely manner.

5. Activate and disseminate information of the company's grievance mechanism to the public ensuring alignment with the ESMP.
6. Produce an Occupational Health and Safety Plan (OHS)
7. Produce an Emergency Response Plan (ERP)
8. Produces a Hazardous Waste Management Plan

### **3.1.2 Physical Environment**

Since the time of the last audit and monitoring report, BTIC has implemented several improvements, such as paving the factory entrance and levelling, paving, and asphaltting a 618m<sup>2</sup> yard to accommodate production barrels, effectively eliminating dust generation. Remaining air quality concerns are minimal and primarily due to traffic and vehicular movements. The existing diesel-driven forklift is a potential source of air pollution. The factory is not expected to cause noise beyond allowable limits due to its distance from the nearest house, new machinery, and the recent procurement of a grading machine, all situated within a hanger to minimize noise propagation. During the audit, noise levels inside the working area were acceptable. The factory is situated in a non-traffic-impacting area and holds all necessary permissions, with no significant environmental concerns regarding biodiversity or groundwater pollution. The adaptive procedure of pre-treating washing water and reusing it in production cycles demonstrates good wastewater management practices.

The BITC factory generates various types of waste, including solid, liquid, and gaseous wastes. Solid waste includes out-of-specification cucumbers, spent pickling agents, and packaging waste. There are no log data for solid waste since the site visit occurred on the production start date. Hazardous waste, such as spent brine and vinegar solutions, poses environmental threats if not treated before disposal. Cleaning agents used for equipment sanitation can also be hazardous. Currently, there is no clear inventory of hazardous waste. The company reported an increase in electricity consumption following an upgrade, which has not impacted neighbours or the community due to coordination with the municipality and the availability of an emergency diesel generator.

#### Recommendations:

1. Create an inspection and maintenance log for machinery based on manufacturers' recommendations.
2. Ensure stormwater is adequately collected and directed through the filtration process into the wastewater storage before being sent to the septic tank, preventing soil infiltration or runoff.
3. Comply with EQA, PWA, and local service provider regulations regarding the qualitative and quantitative measures of generated wastewater.
4. Properly manage packaging waste by separating cardboard and plastic wrapping films from other solid waste and recycling them at authorized facilities.
5. Collect hazardous waste in separate bins or containers, preferably in locked facilities until disposal, and coordinate with the competent department of Kufur Dan municipality or the JSC for disposal of empty containers contaminated with hazardous materials.

### **3.1.3 Social Environment**

BITC employs a workforce where all workers, including seasonal and full-time employees, are above 18 years old, with a majority of seasonal workers being female. Full-time employees earn wages above the minimum wage, while seasonal workers are compensated at a rate of 12 NIS per hour, which exceeds the minimum hourly wage. Furthermore, all workers are insured, as confirmed by BITC's financial manager. However, the ESMP's target of achieving a 70% female workforce had not been met at the time of the audit, with only 30% of the goal achieved. This recruitment shortfall is attributed to

the project's delayed commissioning and reliance on a single vegetable (cucumber) for pickling. The company intends to diversify the vegetables harvested throughout the year for pickling, which will create more job opportunities for workers. The worker log requires better organization, particularly in recording age, name, and gender information. Factory inspections showed that rest hours for workers are being observed, with separate resting areas and rest rooms provided. Additionally, personal protective equipment (PPE) is adequately supplied, and chemicals are handled, stored, and ventilated properly. However, deficiencies were noted in safety measures for stairs, floor maintenance in chemical-use areas, absence of first aid boxes, and ergonomic chairs for workers.

Recommendations:

1. Develop and enforce a comprehensive code of conduct that includes clauses for preventing gender-based violence (GBV) and outlines specific reporting and grievance procedures. Establish and activate a grievance mechanism for workers, with clear channels for reporting sexual exploitation, abuse, and harassment (SEA/SH) complaints. Provide orientation and training sessions to workers on this grievance mechanism.
2. Enhance recruitment strategies to achieve the ESMP's 70% female workforce target.
3. Improve the organization and maintenance of worker logs to ensure accurate and up-to-date records.
4. Develop training programs to support the professional growth of seasonal workers and establish a feedback mechanism for worker concerns.
5. Install safety guards on stairs, maintain floors in chemical-use areas, provide first aid boxes, ergonomic chairs for workers, and develop an incident and injury log.
6. Provide comprehensive Occupational Health and Safety (OHS) training as part of reworker orientation to enhance safety awareness and practices.
7. Develop a Workers' General Manual (GM) that includes GBV prevention clauses, translate the CoC into Arabic, and conduct GBV awareness and literacy training.

Based on the findings and recommendations detailed above, the company's performance in institutional arrangement and management requires enhancement and improvements to align with the recommendations provided in the ESMP. The physical environmental impacts are considered moderately satisfactory. However, there is an urgent need to develop an occupational health and safety plan. It is also noted that the company's social adherence is satisfactory.

### **3.2: PETRA Glass Factory Expansion – Glass Manufacturing Furnace subproject**

#### **3.2.1 Institutional Arrangement and Management**

During the reporting period of Q1/Q2 2024, a remarkable progress has been made by the company in adhering to and complying with Environmental and Social (ES) good practices, Environmental and Social Management Plan (ESMP) mitigation measures, and ES audit recommendations compared to Q3/Q4 2023 audit and monitoring report. Additionally, improvements in institutional arrangements have been noted. This is evident from the company's achievements in obtaining ISO9001 and the certificate from the Israel Standards Institute. The company has made significant strides in establishing and implementing Occupational Health and Safety (OHS) protocols. The appointment of an engineer as the OHS Officer, the establishment of an OHS committee, and the formulation of a comprehensive OHS plan demonstrate a strong commitment to workplace safety. The integration of the Environmental and Social Management Plan (ESMP) and the initiation of training sessions on OHS further indicate proactive measures to ensure a safe working environment.

Recommendations

Despite significant advancements, there are areas needing improvement. The absence of internal periodic Environmental and Social (E&S) audit and monitoring reports, and the incomplete development of the online grievance system highlight gaps in the current system. Although the existing complaint mechanisms have improved, further enhancement is required to ensure effective issue resolution. Additionally, the complaint regarding cigarette smoke suggests a need for more stringent enforcement of smoking regulations.

1. **Conduct Regular Internal Audits:** Establish and implement a routine schedule for internal E&S audits and monitoring reports to ensure continuous compliance with health, safety, and environmental standards.
2. **Establish and Enhance a Robust Grievance Mechanism:** Develop and expedite the implementation of an online grievance system to offer employees multiple reporting channels. Strengthen the mechanism for addressing and resolving complaints, ensuring timely and effective responses. Improve communication about the complaint process and outcomes to maintain transparency and build trust among employees.
3. **Increase Training and Awareness:** Regularly update and conduct training sessions on OHS protocols to ensure all employees are well-informed and compliant with safety regulations. Include specific training on environmental and social responsibilities to align with ESMP requirements.
4. **Continuous Improvement of OHS Plan:** Regularly review and update the OHS plan to reflect any new regulations, industry standards, and feedback from internal audits and employee complaints. Incorporate specific action plans to address identified risks and gaps in the current safety measures.
5. **Emergency Preparedness:** Conduct regular drills and training on the Emergency Response Plan (ERP) to ensure all employees are prepared for potential emergencies. Review and update the ERP based on feedback from these drills and any real incidents that occur.

Therefore, the company's performance regarding institutional setup and environmental and social (E&S) commitment can be considered satisfactory but requires further improvements.

### **3.2.2 Physical Environment**

The new furnace is operational and has no adverse effect on indoor air quality. Noise levels recorded at various factory locations ranged from 49 to 68 dBA, suggesting potentially higher levels at the source. Current management of glass washing wastewater using primitive basins is inefficient, posing environmental risks due to potential leaks or overflow. Water management efforts and waste management practices require improvement to reduce environmental impact and maintain a clean environment. Energy management discussions with utility companies to align energy subscriptions are positive steps.

#### **Recommendations**

1. **Air Pollution:** To address air pollution caused by diesel forklifts, it is advisable to switch to electric or hybrid forklifts that emit minimal pollutants. Given that production operations generate glass dust, it is essential to provide personal protective equipment (PPE) to all employees and enforce its use during operations. Additionally, materials related to air pollution and dust generation, along with effective mitigation measures, should be included in the occupational health and safety training sessions conducted by the OHS officer.
2. **Wastewater:** To enhance wastewater management, achieve cleaner effluent, and minimize environmental impact, it is crucial to prioritize the installation and use of the recently acquired

press filter for glass washing wastewater. Filtered wastewater can be used in the cooling process. This will reduce water consumption (350m<sup>3</sup>/day) and its environmental impact. Additionally, assess the requirements set by Jericho Argo Industrial Park (JAIP) for connecting the plant's wastewater to the upcoming JAIP wastewater treatment plant to ensure compliance with environmental standards.

3. **Solid Waste:** It is advisable to implement waste sorting, ensure proper disposal of broken glass, explore glass recycling options, and maintain regular waste disposal and cleaning schedules. Designating specific storage areas for wood pallets and solid waste will also contribute to a cleaner environment.
4. **Energy Management:** Installing a photovoltaic (PV) solar energy system is recommended to address increased electricity demand, reduce reliance on non-renewable sources, and minimize environmental impacts. Additionally, exploring government incentives for renewable energy projects can further enhance sustainability efforts.
5. **Occupational Health and Safety:** To enhance occupational health and safety, it is essential to establish strict regulations for vehicle movement within the plant's production area to ensure safety. Additionally, to mitigate workers' exposure to potentially harmful noise levels, providing earplugs is recommended. It is also crucial to enforce the mandatory use of personal protective equipment (PPE) during operational hours. Clearly marking and organizing walking areas within the production facility will further contribute to safety. Moreover, addressing the contamination of the double glass production area floor with silicon and grease highlights the need for daily cleaning protocols to maintain a safe working environment.

Overall, while the company's performance regarding physical environmental impacts is satisfactory and aligns with ESMP requirements, further improvements are necessary to enhance sustainability and safety.

### **3.2.3 Social Environment**

PETRA has demonstrated commendable adherence to labor standards by employing only full-time workers, with no part-time or underage employees, and ensuring that worker salaries exceed the minimum wage. This reflects the company's commitment to fair compensation and ethical labor practices. Additionally, PETRA has taken proactive steps to improve working hours by implementing a new bylaw that adjusts the work schedule to 8 hours a day, six days a week, enhancing compliance with labor laws and improving workers' well-being.

In terms of its social responsibility to protect the environment, PETRA is actively installing a wastewater filtration system to address the discharge of solid particles, showcasing its dedication to environmental stewardship. The company is also collaborating with JAIP to finalize and implement a wastewater pretreatment unit, a partnership aimed at mitigating environmental impacts and addressing community concerns. Efforts to enhance facility cleanliness by regularly cleaning contaminated areas and clearly marking crowded walking areas further contribute to improved operational safety and reduced workplace accidents.

#### **Recommendations**

To further enhance worker health and safety, it is recommended that PETRA promptly include comprehensive medical histories in each worker's file. This will improve health monitoring and ensure complete worker profiles. Addressing occupational safety concerns is crucial, particularly the inconsistent use of safety gear such as gloves and helmets. Implementing strict enforcement of safety

protocols and conducting regular training sessions will significantly mitigate risks associated with workplace hazards like scattered glass and noise exposure from machines.

To improve indoor air quality and address complaints regarding smoking in administrative offices, stricter enforcement of smoking regulations is necessary. Additionally, continuous monitoring and adherence to the revised work schedule are recommended to ensure sustained compliance with labor laws and to foster a safe and supportive work environment.

PETRA should also continue its collaboration with JAIP to finalize and implement the wastewater pretreatment unit, ensuring regular updates and joint efforts to mitigate environmental impacts. Enhancing facility cleanliness by regularly cleaning contaminated areas and clearly marking crowded walking areas will further improve operational safety and reduce workplace accidents.

Despite PETRA's progress in Occupational Health and Safety (OHS) and labor rights, the incident involving a worker's injury indicates that the OHS component requires further improvement to achieve a satisfactory rating.

### **3.3: MADA FTTH Subproject**

#### **3.3.1 Institutional Arrangement and Management**

From the project's start date, MADA appointed two focal points: one for Environmental and Social (E&S) and Occupational Health and Safety (OHS) matters, and the other for managing Grievance Redress Mechanism (GRM) complaints. This appointment demonstrates MADA's commitment to meeting ESMP requirements. During the first quarter of 2024, the company significantly expanded its workforce by hiring 51 new permanent employees, including a diverse range of skilled workers such as network engineers, field sales agents, tele sales agents, customer service representatives, and a marketing officer. Unskilled workers were also added to support operational needs. All employees undergo essential training on the company's Environmental & Social Management Plan (ESMP) and Code of Conduct (CoC) through the MenaMe portal, which includes orientation sessions and rigorous Occupational Health & Safety (OHS) training.

Before commencing installations, the company's engineers conduct thorough site assessments to evaluate environmental conditions and develop effective mitigation strategies, ensuring minimal impact on local communities and the environment. TrioTech, established by MADA, plays a pivotal role in managing fiber installations and acts as a critical interface between MADA and subcontractors, overseeing project execution and ensuring operational efficiency.

The company's commitment to transparency and sustainability is reflected in its quarterly internal reports, which include detailed assessments of Environmental & Safety (E&S) issues and the implementation of corrective actions identified in previous monitoring periods. A dedicated complaints unit, supported by an automated ticketing system, ensures timely resolution of customer concerns. Additionally, MADA has implemented an accessible online complaints system, including provisions for anonymous submissions, underscoring their commitment to customer satisfaction and prompt issue resolution.

All complaints, including those related to E&S matters, are meticulously logged and professionally managed within the company's systems, demonstrating their adherence to systematic and responsive complaint handling practices. The company has launched a Workers' Code of Conduct (CoC) system accessible through its portal, applicable to both direct employees and contractors managed under the

supervision of TrioTech. This initiative aims to uphold ethical standards and foster a positive work environment across all organizational levels.

MADA and TrioTech have implemented comprehensive Occupational Health and Safety (OHS) plans, including extensive training sessions and on-the-job supervision to ensure employee safety and well-being. Regular health inspections are conducted, and strict compliance with medical clearance requirements is enforced for all workers involved in project activities. By leveraging existing infrastructure, the company minimizes the need for excavation work, reducing potential disruptions and environmental impacts associated with construction activities.

As such, MADA has shown impressive enhancements and adherence to their E&S institutional requirements under the ESMP. Therefore, MADA's performance over this reporting period (i.e., Q1 2024) is noted as satisfactory in terms of institutional commitments.

#### Recommendations

The company should continue to expand and diversify its workforce while ensuring all employees receive comprehensive training on the ESMP and CoC. This will help maintain high standards of performance and compliance across the organization. Furthermore, it is essential to further develop and refine environmental assessment and mitigation strategies to continue minimizing the impact on local communities and the environment.

Strengthening TrioTech's role in managing fiber installations and coordinating with subcontractors will enhance project execution efficiency. Maintaining and improving the quality and transparency of internal reports, with detailed and timely assessments of E&S issues and corrective actions, will support the company's commitment to sustainability and accountability.

Optimizing the customer complaint handling process by leveraging technology can ensure that all customer concerns, particularly those related to E&S matters, are addressed promptly and effectively. The company should also continue to enforce the Workers' Code of Conduct and promote ethical behaviour across all organizational levels to ensure a positive and compliant work environment.

Regularly reviewing and enhancing OHS plans, training sessions, and health inspections will help maintain the highest standards of employee safety and well-being. Additionally, by continuing to leverage existing infrastructure to minimize environmental disruptions and exploring innovative methods to further reduce the environmental impact of construction activities, the company can strengthen its environmental stewardship.

Finally, it is crucial to regularly review and assess institutional performance against E&S requirements. Aiming for continuous improvement and higher levels of satisfaction in future reporting periods will help the company maintain its satisfactory performance and meet its institutional commitments effectively.

### **3.3.2 Physical Environment**

During the Q1 2024 audit and monitoring visit, MADA and its contractor carried out overhead installations, specifically focusing on the FTTH network in residential and commercial buildings. The project in the Al-Masyoon area of Ramallah exemplifies environmentally responsible infrastructure development by avoiding trenching and civil works, opting instead to connect cable lines to existing electricity poles. Compliance with JEDCO's electricity regulations and local council guidelines ensures adherence to best practices, thereby minimizing emissions of fumes and dust. Post-installation, meticulous cleaning of work areas highlights the company's commitment to maintaining cleanliness and

environmental stewardship. The implementation of a maintenance log for machinery and vehicles demonstrates a proactive approach to operational efficiency and sustainability, aligning with recommendations from previous quarterly reports.

These practices not only promote operational excellence but also reinforce the company's reputation as a responsible corporate entity dedicated to stakeholder satisfaction and community well-being. Collaborative efforts with local councils during drilling and cutting activities ensure minimal traffic disruption and road safety, supported by strict adherence to Occupational Health and Safety procedures and the Environmental and Social Management Plan (ESMP) mitigation measures. This comprehensive approach ensures project success while supporting biodiversity conservation, safeguarding water resources, and minimizing solid waste generation, thereby enhancing the project's positive socio-economic impact and environmental sustainability.

Recommendations:

MADA and its contractors should continue avoiding trenching and civil works by connecting cable lines to existing electricity poles to minimize environmental impact. Adhering to JEDCO's electricity regulations and local guidelines is essential to reduce emissions of fumes and dust. Implementing and maintaining a maintenance log for machinery and vehicles will ensure operational efficiency and sustainability. Practicing diligent cleaning post-installation will uphold environmental stewardship and cleanliness. Enhanced collaboration with local councils during drilling and cutting activities will minimize traffic disruption and ensure road safety. Strict adherence to health and safety procedures and ESMP mitigation measures will ensure worker safety and project compliance. Additionally, supporting biodiversity conservation and safeguarding resources by minimizing solid waste generation and protecting water resources will enhance the project's positive socio-economic and environmental impact.

### **3.3.3 Social Environment**

Comprehensive Training and Education: The Quality Assurance department at Triotec has successfully implemented a rigorous two-week induction program for new employees, focusing on labor rights, working conditions, and health and safety. This program, conducted at the JEDCO Training Centre in Jericho, ensures uniform standards across all governorates.

Protection of Worker Rights: Triotec ensures all workers are compensated above the minimum wage as stipulated by labor law, fully protecting their rights under labor regulations.

Occupational Health and Safety (OHS): The project has developed and communicated an OHS policy and plan to all workers on site. Workers, particularly during overhead installations, face OHS risks such as slips, falls, falling objects, and electrocution. To mitigate these risks, all on-site workers are supplied with Personal Protective Equipment (PPE), including hard hats, harnesses, gloves, boots, and appropriate clothing. Additionally, all vehicles are equipped with fire extinguishers and first aid kits for emergency preparedness.

Environmental Impact: The project owns 80 working cars, of which 60 are fully electric, contributing to socioeconomic development and reducing CO<sub>2</sub> emissions. According to the World Health Organization (WHO), there is no evidence confirming health consequences from exposure to low-level electromagnetic fields, further minimizing environmental and health risks.

*Gender Mainstreaming and Workforce Diversity:* Over 50% of the project's workforce consists of women, meeting and applying the requirements of the Environmental and Social Management Plan (ESMP) regarding gender mainstreaming.

*Commitment to Ethical Conduct:* The Code of Conduct (CoC) includes clauses related to gender-based violence (GBV), ensuring a safe and respectful working environment for all employees.

*Overall Achievements:* The project's commitment to comprehensive training, worker rights protection, occupational health and safety, environmental sustainability, gender mainstreaming, and ethical conduct demonstrates a significant positive social impact. The company has substantially implemented corrective actions and has not displayed any major breaches of the ESMP or local laws and legislation.

*Recommendations:*

Compliance with the ESMP's social aspects, especially regarding gender mainstreaming, the Code of Conduct, and the orientation of new workers, should be continued. Therefore, the company's social compliance can be assigned as satisfactory in terms of social commitments.

MADA has demonstrated significant improvements and adherence to their E&S institutional requirements under the ESMP. Both MADA and its contractors have shown satisfactory compliance with environmental mitigation measures, implementing corrective actions effectively without major breaches of the ESMP or local laws and regulations. Continued compliance with the ESMP's social aspects, particularly regarding GM, CoC, and new worker orientation, is essential. Thus, the company's social compliance is also deemed satisfactory.

### **3.4: Massader Schools rooftop PV solar Subproject**

#### **3.4.1 Institutional Arrangement and Management**

Massader and its contractor, Triple K Solar for Renewable Energy, demonstrate robust institutional arrangements and effective environmental and social management practices. Massader has appointed an engineer acts as site engineer and OHS manager, who ensures comprehensive oversight of environmental responsibilities. Also, the project engineer strengthens occupational health and safety (OHS) protocols. Workers are well-trained and informed through sessions covering the Environmental and Social Management Plan (ESMP), Code of Conduct (CoC), and OHS guidelines. Pre-installation surveys by OHS and site engineers ensure thorough environmental assessments and effective mitigation strategies.

*Recommendations*

While significant progress has been made, there are areas that need improvement. Batch 5, managed by NEDCO, should focus on completing the remaining 10% of construction and improving grid connection from 67% to 100%. Similarly, Batch 7 should aim to complete the remaining 15% of construction and increase grid connection from 66% to 100%. Batch 8 requires substantial effort to finish the remaining 20% of construction and to significantly improve grid connection, which is currently at only 5%.

To further enhance their operational effectiveness, Masader should maintain rigorous E&S audits and monitoring to ensure continuous compliance with health, safety, and environmental standards. Expediting the development of the online grievance system will provide employees with multiple channels to report issues, ensuring the system is fully functional.

Moreover, Masader should continue to improve their complaint handling mechanisms by ensuring timely and effective responses, enhancing communication about the complaint process, and maintaining transparency. Regular updates and training on OHS protocols, including specific training on environmental and social responsibilities, will ensure all employees are well-informed and compliant with safety regulations.

Finally, Masader should regularly review and update the Occupational Health and Safety (OHS) plan to reflect new regulations, industry standards, and feedback from internal audits and employee complaints. Conducting regular drills and training on the Emergency Response Plan (ERP) will ensure all employees are prepared for potential emergencies, and reviewing and updating the ERP based on feedback from these drills will further enhance preparedness.

### **3.4.2 Physical Environment**

Based on the audit of the two schools visited during this cycle, the installation of photovoltaic (PV) systems on their rooftops has been executed with minimal environmental impact and demonstrates excellent compliance with physical environment protection requirements. The concrete and waterproof lining materials used in construction ensure that dust generation is minimal, as observed during site visits. Roads surrounding the schools are paved, preventing dust from transportation activities, and vehicle emissions are minimal due to the limited volume of materials and small workforce. Noise and vibrations were not a concern as the work was conducted during summer vacations, and the nearest residential houses are 30 meters away from each school, further reducing potential noise impacts.

No traffic disruptions or road safety impacts were observed during site visits. PV panels have already been transported to the rooftops, indicating no future traffic impacts. Visual impacts are minimized as no accumulated waste was observed during site visits. The project sites, confined to rooftops, do not impact biodiversity or water resources, and water consumption is minimal.

The construction activities do not significantly impact public utilities and services due to the limited workforce and construction activities. The workforce uses existing school toilet facilities, generating no additional wastewater. Waste management practices are effective, with various types of waste, including domestic, non-hazardous, and hazardous construction waste, being properly and collected and sent to Masader's stores for proper management. Portable fire extinguishers are available to manage potential fires. The construction work does not involve land encroachment, as all activities are confined to school rooftops.

#### **Recommendations**

To further enhance compliance with the PV installation process on school rooftops at various sites, Masader is advised to maintain their current effective practices and consider the following recommendations for additional improvement.

Dust management can be improved through suppression techniques and regular monitoring. Emission control should be achieved using low-emission vehicles and scheduling work during off-peak hours. Periodic noise and vibration monitoring, along with advance notices to nearby residents, should be implemented. Traffic management requires detailed planning and a dedicated traffic coordinator.

For waste management, designated collection points, waste segregation programs, and worker training are essential. Water conservation practices and proper wastewater disposal should be emphasized. Regular fire drills, emergency response training, and accessible emergency equipment are necessary to

enhance safety. Strengthening community engagement is also crucial to ensure smooth project implementation and address any community concerns.

### **3.4.3 Social Environment**

During this monitoring cycle round, Massader's solar PV installation project on school rooftops has demonstrated a strong commitment to worker safety, community engagement, and socio-economic development. Comprehensive Occupational Health and Safety (OHS) policies, including the provision of personal protective equipment (PPE) and regular training sessions, have created a safe working environment for all personnel. Additionally, protective fencing and safety wiring on rooftops help mitigate risks associated with overhead installations.

The project has positively impacted local communities by generating direct employment opportunities and stimulating economic activity through local procurement. Each installation phase involves an average of three workers daily over ten working days, underscoring Massader's dedication to enhancing livelihoods and supporting local businesses.

#### **Recommendations**

To sustain and amplify these positive impacts, several recommendations are proposed for the upcoming quarters:

- **Enhance Community Engagement:** Continuously engage with school communities to address concerns promptly and maintain support throughout the project. Expand awareness programs to highlight project benefits and foster positive relationships.
- **Strengthen Grievance Mechanisms:** Ensure the effectiveness of grievance mechanisms by providing accessible channels for workers and local residents to report concerns. Regularly review and update these mechanisms based on feedback and community needs.
- **Sustain Employment Opportunities:** Collaborate closely with local authorities and contractors to maximize job opportunities for residents, particularly in skilled and supervisory roles. Monitor and assess the socio-economic impact of employment initiatives to ensure equitable distribution of benefits.
- **Maintain Safety Measures:** Conduct regular safety audits and inspections to uphold high safety standards across all project sites. Provide ongoing training to workers on new safety protocols and reinforce adherence to existing guidelines.

By implementing these recommendations, Massader can sustain and further enhance its social impact, strengthen community relations, and ensure sustainable outcomes as the project progresses through Q2 2024 and beyond.

## 4. Identification of Gaps and Action Plans

### 4.1 Identification of Gaps

The following identified the main gaps that will be verified by F4J ES teams as part of the ES monitoring of the other ongoing beneficiary companies,

1. Challenges in Addressing Compliance and Non-Compliance: Despite the full support from the F4J-DAI team in facilitating introductions between the consultant and all subproject focal points, addressing compliance and non-compliance issues related to ESMP requirements proved challenging. This difficulty arose from inconsistencies in reporting formats and discrepancies in auditing and monitoring reports across different subprojects. The evaluator faced significant obstacles due to varied communication and collaboration practices among focal points. MADA and Massader delivered timely and well-organized information, whereas BITC and, to lesser extent, PETRA were slow to respond and lacked systematic record-keeping, which impeded effective management of compliance issues.
2. Lack of Regulatory Site Visits: During this monitoring cycle, no site visits were conducted by competent authorities, such as the Environment Quality Authority (EQA), to verify the implementation of the mitigation measures specified in the ESMP. The lack of such inspections has created a gap in oversight, potentially allowing issues related to environmental and social safeguards to remain unchecked. Regular inspections by regulatory bodies are crucial for ensuring that mitigation strategies are effectively executed and adhered to, maintaining the integrity of the ESMP, and ensuring compliance with environmental and social standards.
3. Focal Points' Awareness of Previous Reports: Although the DAI-F4J team has sent copies of corrective actions from previous audit and monitoring cycles to all subproject focal points, including those at BITC and PETRA, the OHS and ES officers at these organizations claim they never received these documents. They assert that this lack of access to corrective actions is a key factor in their non-compliance with audit and monitoring outcomes.
4. Absence of Dedicated ESO: Although the DAI-F4J team provides valuable support and advice to all subproject focal points and OHS officers to ensure compliance with institutional, environmental, and social standards, the lack of a dedicated Environmental and Social Officer (ESO) at the PIA during the Q3/2023 and Q2/2024 has created challenges in effectively implementing E&S management plans for subprojects. The presence of an ESO is crucial for overseeing E&S compliance, monitoring, and resolving issues.

### 4.2 Action Plan for the Identified Gaps

1. F4J define clear ES communication hierarchy and commitment to all beneficiary companies and ensure record keeping for each company.
2. Ensure appointment and maintain of OHS Officers engagement: To improve overall project management, it is crucial to ensure that each subproject has a qualified OHS Officer from the start of implementation. Currently, BITC lacks a qualified OHS Officer, while PETRA has an OHS Officer who requires further training on OHS matters. On the other hand, Massader and Madda both have OHS Officers in place. These officers should work closely with the Environmental and Social Officer (ESO) at the Project Implementation Agency (PIA) to enhance oversight, improve monitoring, and ensure comprehensive training and issue

resolution, thereby ensuring full compliance with environmental and social standards. F4J should maintain monitoring and reporting presence of those focal points and discuss with beneficiary companies on advancement as needed for each company to ensure continued compliance during the project implementation.

3. **Develop and Implement Comprehensive and well-functioning GRMs:** Among the four subprojects audited, only MADA and Massader had fully developed and effective Grievance Redress Mechanisms (GRMs). For the PETRA and BITC with weak or underdeveloped GRMs, it is essential to develop and implement comprehensive systems to ensure that grievances are managed efficiently and transparently. BITC currently lacks a Grievance Redress Mechanism (GRM), it is essential to develop and activate a grievance mechanism for both the public and workers.
4. **Appointing an ESO at the PIA:** To address the challenges associated with the absence of an ESO, it is necessary to appoint an ESO at the PIA (recently, PIA has appointed an ESO), the ESO shall be maintained throughout the project implementation. This role should work in close coordination with OHS Officers for each subproject to enhance overall project management:
  - *Integrated Oversight:* The ESO should collaborate with OHS Officers to ensure that E&S management plans are fully integrated with OHS protocols. Aligning their efforts will streamline oversight and ensure consistent application of both environmental and safety measures across all subprojects. Also, the ESO should collaborate with the OHS officers and apply tires of monitoring to apply the measures presented in the ESMP.
  - *Ongoing Engagement and Orientation:* The ESO must facilitate continuous engagement and orientation for subproject staff and management regarding ESAs and ESMPs. This ongoing awareness will ensure that all stakeholders remain informed and compliant with E&S requirements throughout the project's duration.
  - *Coordinated Monitoring and Reporting:* The ESO should work with OHS Officers to develop an integrated monitoring and reporting system, improving the tracking of both E&S and OHS performance for thorough and timely reporting. The ESO will also oversee the application of E&S instruments and manage capacity-building initiatives, including training on the environmental and social measures as outlined in the Project's ESMP's.
  - *Joint Training and Support:* The ESO should assist OHS Officers in designing and delivering joint training programs for subproject staff. These programs should address both E&S and OHS requirements, providing a holistic approach to compliance and ensuring that all workers are well-informed about both environmental and safety standards.
  - *Collaborative Issue Resolution:* The ESO and OHS Officers should work together to address and resolve any E&S and OHS-related issues or grievances. This collaboration will ensure that concerns are managed promptly and that solutions effectively address both environmental impacts and occupational hazards.
  - *Enhanced Compliance Assurance:* The ESO should support OHS Officers by ensuring alignment of E&S management plans with safety regulations and practices. This cooperation will help maintain compliance with all relevant standards and adapt plans as necessary based on evolving project conditions and regulatory requirements.

5. Ensure that all subprojects' focal points are made aware of the findings from this and previous evaluation reports and audit recommendations. To address this issue, it is crucial to implement a system for confirming receipt of important documents. This could include requiring acknowledgment receipts or regular follow-ups to ensure all relevant parties have received and reviewed the corrective actions. Additionally, providing access to a centralized digital repository where all subproject focal points can easily access and reference these documents may help prevent similar issues in the future.
6. For the upcoming audit cycle, it is recommended to include all subprojects that have not been previously audited. Special attention should be given to subprojects that have recently received approval from the World Bank for their Environmental and Social Management Plans (ESMPs).
7. It is essential for the ESO at the PIA to instruct each subproject focal point to prepare a summary of their ESMP and distribute it to all relevant stakeholders and workers. This approach will facilitate the identification and resolution of potential environmental and social issues, thereby improving subproject management and ensuring compliance with World Bank guidelines.

### **4.3 Short- and Long-Term Action Plan**

It is imperative to implement both short-term and long-term corrective actions to ensure the successful completion and sustainability of project outcomes.

Short-term actions will address immediate issues (in a time range of less than 6 months), enabling us to meet critical deadlines and fulfill contractual obligations, thereby maintaining stakeholder trust and project integrity. These actions include the following parts, expedited training sessions for Environmental and Social Focal Points, immediate implementation of essential safety measures, enhance waste management protocols, provide regular Occupational Health and Safety (OHS) training, and improve the maintenance of equipment and machinery to reduce emissions and ensure operational efficiency. Those measures will also be implemented, maintained and monitored during the extension of the project (if extended) including the emergency action plan implementation as needed.

In contrast, long-term corrective actions will focus on embedding improvements into future initiatives, such as environmental policy development, sustainability measure, and long-term equipment upgrades. By taking a dual approach, we can not only mitigate current challenges but also build a foundation for sustained success beyond the project's conclusion.

The following Tables shows the corrective actions required for each subproject; compliance of those aspects shall also be verified for other beneficiaries' companies as per the clauses depicted in their ESMPs throughout the project implementation including the expected project duration extension.

#### 4.3.1 BITC Garden Agricultural Marketing Company

**Table 5.** Corrective actions, responsibilities, and timeline for BITC company.

| Environmental/Social Aspect              | Gaps                                                                                                            | Required action(s) as ESMP and/or previous Corrective actions                                                                                                                | Responsibility                                                      | Time to complete | Cost               |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|------------------|--------------------|
| Institutional arrangement and management | Short Term Actions (< 6months)                                                                                  |                                                                                                                                                                              |                                                                     |                  |                    |
|                                          | No maintenance and inspection log for machinery                                                                 | Provide maintenance and inspection log for machinery in line with the manufacturer's recommendations                                                                         | BITC'S Management team and maintenance department<br>ES Focal point | 1 month          | No additional cost |
|                                          | Project Workers do not know about the CoC.                                                                      | Circulate the CoC to project workers, discuss and sign.                                                                                                                      | ES Focal point<br>In coordination with HR department.               | Immediately      | No additional cost |
|                                          | No logs for seasonal workers                                                                                    | Provide Log for seasonal workers including their ages, names, and gender                                                                                                     | ES Focal point<br>In coordination with HR department                | 1 month          | No additional cost |
|                                          | The focal point still needs to become familiar with the ESMP and the E&S mitigation measures.                   | <ul style="list-style-type: none"> <li>Appoint/hire qualified E&amp;S focal point and define responsibilities.</li> <li>Increase the capacity of the focal point.</li> </ul> | BITC's Management team                                              | 1 month.         | No additional cost |
|                                          | The BITC team is not familiar with the ESMP and E&S mitigation measures, and best practices for implementation. | Provide training/orientation for workers on Environmental and Social aspects                                                                                                 | BITC's Management Team with the support of DAI E&S officer          | 1 month          | 100 USD            |
|                                          | No active workers GM is present                                                                                 | Develop, implement, and activate workers Grievance Mechanism as required per ESMP.                                                                                           | E&S Focal Point                                                     | 3 months         | 1500 USD           |
|                                          | Long Term Actions (> 6 months)                                                                                  |                                                                                                                                                                              |                                                                     |                  |                    |
|                                          | New Workers do not know about the CoC.                                                                          | Keep circulating the CoC to new workers, discuss and sign.                                                                                                                   | ES Focal point<br>In coordination with HR department.               | Continuous       | No additional cost |

|                      |                                                                                                                                                                           |                                                                                                                                                                                                                                                                        |                                                                     |           |                          |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|-----------|--------------------------|
|                      | Unfamiliarity with the E&S aspects.                                                                                                                                       | Provide regular training/orientation for workers on Environmental and Social aspects                                                                                                                                                                                   | E&S Focal Point                                                     | Quarterly | 100 USD for each session |
| Physical Environment | Short Term Actions (< 6 months)                                                                                                                                           |                                                                                                                                                                                                                                                                        |                                                                     |           |                          |
|                      | An inadequate (OHS) environment. (No warning signs were noticed, no restricted entry areas for visitors. workers safety clothes or tools were not seen during the visit.) | <ul style="list-style-type: none"> <li>• Install safety and warning signs in the factory.</li> <li>• Provide all safety measure to workers including PPE and wear ear plugs in certain places in the plant.</li> <li>• Ensure workers use PPEs during work.</li> </ul> | E&S Focal point                                                     | 2 months  | 500 USD                  |
|                      | An inadequate (OHS) environment. (High noise level)                                                                                                                       | <ul style="list-style-type: none"> <li>• Provide noise levels measurements on site.</li> <li>• Ensure the adherence of equipment's and machinery's noise levels with manufacturer's specifications.</li> </ul>                                                         | E&S focal point                                                     | 1 month   | 500 USD                  |
|                      | No maintenance and inspection log for machinery                                                                                                                           | Provide maintenance and inspection log for machinery in line with the manufacturer's recommendations                                                                                                                                                                   | BITC'S Management team and maintenance department<br>ES Focal point | 1 month   | No additional cost       |
|                      | Waste and wastewater management                                                                                                                                           | <ul style="list-style-type: none"> <li>• The company shall develop a log of emptying of the septic tank.</li> <li>• The company shall conduct periodic monitoring of wastewater quality in line with the ESMP</li> </ul>                                               | E&S focal point                                                     | 2 months  | No additional cost       |
|                      | An inadequate (OHS) environment.                                                                                                                                          | Install safety guards on stairs, maintain floors in chemical-use areas, provide first aid kits, ergonomic chairs for workers, and create an incident and injury log.                                                                                                   | E&S focal point and BITC's management team                          | 1 month   | 500 USD                  |
|                      | An inadequate (OHS) environment.                                                                                                                                          | Properly maintain the existing diesel-driven forklift to reduce CO <sub>2</sub> and other pollutant emissions                                                                                                                                                          | E&S focal point                                                     | 2 months  | 300 USD per month        |

|                    |                                  |                                                                                                                                                                                                                                     |                                            |            |                    |
|--------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|------------|--------------------|
|                    | Long Term Actions (> 6 months)   |                                                                                                                                                                                                                                     |                                            |            |                    |
|                    | An inadequate (OHS) environment. | Maintain machinery maintenance logs                                                                                                                                                                                                 | Operations Team                            | Continuous | No additional cost |
|                    | An inadequate (OHS) environment. | Maintain best practice in terms of waste management and recycling protocols                                                                                                                                                         | E&S focal point                            | Continuous | No additional cost |
|                    | An inadequate (OHS) environment. | Continuous properly maintaining the existing diesel-driven forklift to reduce CO <sub>2</sub> and other pollutant emissions                                                                                                         | E&S focal point                            | Continuous | 300 USD per month  |
|                    | An inadequate (OHS) environment. | Develop an Occupational Health and Safety Plan (OHS), an Emergency Response Plan (ERP), and Hazardous Waste Management Plan. Provide workers with OHS orientations                                                                  | E&S Team/OHS officer                       | Continuous | 1000 USD           |
| Social Environment | Long term Actions (> 6 months)   |                                                                                                                                                                                                                                     |                                            |            |                    |
|                    | Insufficient GRM mechanism       | <ul style="list-style-type: none"> <li>• Activate workers Grievance Mechanism as required per ESMP.</li> <li>• Provide complaint box</li> </ul>                                                                                     | E&S focal point/ BITC' management team     | Continuous | No additional cost |
|                    | Insufficient GRM mechanism       | <ul style="list-style-type: none"> <li>• Circulate the CoC to project workers, discuss and sign.</li> <li>• Include gender-based violence (SEA / sexual harassment) prevention clauses in the suggested code of conduct.</li> </ul> | HR in coordination with the ES focal point | Continuous | No additional cost |

#### 4.3.2 PETRA Glass factory Expansion

**Table 6.** Corrective actions, responsibilities, and timeline for PETRA company.

| Environmental/Social Aspect              | Gaps                                                                                  | Required action(s) as ESMP and/or previous Corrective actions                                                                                                                                                                                                           | Responsibility                                  | Time to complete                       | Cost               |
|------------------------------------------|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------------------------|--------------------|
| Institutional arrangement and management | Short Term Actions (< 6months)                                                        |                                                                                                                                                                                                                                                                         |                                                 |                                        |                    |
|                                          | No shared environmental and social management plan with the entire team is presented. | Share the environmental and social management plan with the entire team or prepare a summary.                                                                                                                                                                           | E&S focal point                                 | 1 month                                | No additional cost |
|                                          | In adequate OHS (JAIP is not consulted regarding connection requirements)             | Contact JAIP to complete the connection of the plant's wastewater to JAIP's wastewater pretreatment unit.                                                                                                                                                               | PETRA's management team and maintenance officer | Immediate                              | No additional cost |
|                                          | Insufficient GRM mechanism                                                            | Activate the workers' GM per the ESMP.                                                                                                                                                                                                                                  | IT and E&S focal point                          | 3 months transparent online GRM system | 1000 USD           |
|                                          | Weak effectiveness of documentation as a guiding framework for emergency measures.    | <ul style="list-style-type: none"> <li>Maintain documentation for all workers, including their contact information.</li> <li>Separating the ERP document from the OHS plan make it more site-specific, serving as a guiding framework for emergency measures</li> </ul> | OHS officer/ ES Focal point                     | 1 month                                | No additional cost |
|                                          | No maintenance and inspection log for machinery                                       | Provide maintenance and inspection log for machinery in line with the manufacturer's recommendations                                                                                                                                                                    | OHS officer/ Maintenance team                   | 1 month                                | No additional cost |
|                                          | Long Term Actions (> 6 months)                                                        |                                                                                                                                                                                                                                                                         |                                                 |                                        |                    |
|                                          | No monitoring reports.                                                                | Implement a quarterly monitoring and provide a report                                                                                                                                                                                                                   | E&S Focal Point                                 | Quarterly                              | No additional cost |

|                      |                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                 |                                                      |            |                    |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|------------|--------------------|
|                      | Insufficient GRM mechanism                                                                                                            | Keep an effective and transparent online GRM system                                                                                                                                                                                                                                                                                                                             | IT and E&S focal point                               | Continuous | No additional cost |
|                      | Low OHS awareness.                                                                                                                    | <ul style="list-style-type: none"> <li>Increasing the OHS awareness.</li> </ul> Keep an occupational health and safety (OHS) officer                                                                                                                                                                                                                                            | PETRA's management team                              | Continuous | No additional cost |
|                      | No maintenance, protocols, and logs.                                                                                                  | <ul style="list-style-type: none"> <li>Provide maintenance and inspection log for machinery in line with the manufacturer's recommendations.</li> <li>keep working with the developed daily cleaning protocols to maintain a safe working environment</li> </ul>                                                                                                                | OHS officer/ Maintenance team                        | Continuous | No additional cost |
| Physical Environment | Short Term Actions (< 6months)                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                 |                                                      |            |                    |
|                      | A record of accidents and injuries is not found.                                                                                      | Create a record of accidents and injuries.                                                                                                                                                                                                                                                                                                                                      | E&S Focal Point                                      | Immediate  | No additional cost |
|                      | Dust extraction system is required                                                                                                    | Install dust extraction systems                                                                                                                                                                                                                                                                                                                                                 | E&S Focal Point in cooperation with Maintenance Team | 4 months   | 1000 USD           |
|                      | No warning signs were noticed, no restricted entry areas for visitors. workers safety clothes or tools were not seen during the visit | <ul style="list-style-type: none"> <li>Incorporate occupational health and safety guidelines and the requirement to wear personal protective equipment (PPE) into the code of conduct.</li> <li>Implement safety measures for the disposal of excess glass to prevent unsafe scattering around the glass clipper machine.</li> <li>Distribute and obligate the PPEs.</li> </ul> | Maintenance team/ OHS officer/ E&S Focal Point       | 2 months   | 700 USD            |

|                               |                                                  |                                                                                                                                                                                                                                                                                                                   |                                                      |            |                    |
|-------------------------------|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|------------|--------------------|
|                               |                                                  | <ul style="list-style-type: none"> <li>Marking and organizing walking areas within the production facility.</li> </ul>                                                                                                                                                                                            |                                                      |            |                    |
|                               | Absence of noise measuring device                | Provide noise levels measurements on site and ensure the adherence of equipment's and machinery's noise levels with manufacturer's specifications.                                                                                                                                                                | OHS officer/<br>Maintenance team/<br>E&S Focal Point | 1 month    | 500 USD            |
| Long Term Actions (>6 months) |                                                  |                                                                                                                                                                                                                                                                                                                   |                                                      |            |                    |
|                               | A record of accidents and injuries is not found. | Keep a record of accidents and injuries.                                                                                                                                                                                                                                                                          | E&S Focal Point                                      | Continuous | No additional cost |
|                               | An inadequate OHS awareness                      | Keep: <ul style="list-style-type: none"> <li>Incorporating occupational health and safety guidelines and the requirement to wear personal protective equipment (PPE) into the code of conduct.</li> <li>conducting occupational health and safety training for workers by the external OHS consultant.</li> </ul> | E&S Focal Point                                      | Continuous | No additional cost |
|                               | Wastewater disposal                              | Connect plant's wastewater to JAIP's wastewater pretreatment unit.                                                                                                                                                                                                                                                | E&S Focal Point                                      | Continuous | No additional cost |

### 4.3.3 MADA FTTH

**Table 7.** Corrective actions, responsibilities, and timeline for MADA company.

| Environmental/Social Aspect              | Gaps                         | Task                                                                                                                                               | Responsibility                                            | Time to complete | Cost               |
|------------------------------------------|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|------------------|--------------------|
| Institutional arrangement and management | Long Term Actions (>6months) |                                                                                                                                                    |                                                           |                  |                    |
|                                          | N/A                          | Strengthening TrioTech's role in managing fiber installations and coordinating with subcontractors will enhance project execution efficiency.      | MADA's Management in cooperation with the E&S Focal point | Continuous       | No additional cost |
|                                          | N/A                          | Maintain high standards of performance and compliance by ensuring all employees receive thorough training on the ESMP and CoC.                     | E&S Focal point                                           | Continuous       | No additional cost |
|                                          | N/A                          | Maintain gender mainstreaming as requested by the ESMP                                                                                             | HR in cooperation with the E&S Focal point                | Continuous       | No additional cost |
|                                          | N/A                          | Continue detailed and timely assessments of E&S issues and corrective actions in internal reports.                                                 | E&S Focal Point                                           | Quarterly        | No additional cost |
|                                          | N/A                          | Continue Leveraging technology to ensure all customer concerns, particularly those related to E&S matters, are addressed promptly and effectively. | IT, E&S focal point and Customer Service                  | Continuous       | No additional cost |
|                                          | N/A                          | Promote ethical behavior across all organizational levels to ensure a positive and compliant work environment.                                     | HR Department in cooperation with the E&S focal point     | Continuous       | No additional cost |
| Physical Environment                     | Long Term Actions (>6months) |                                                                                                                                                    |                                                           |                  |                    |
|                                          | N/A                          | Keep connecting cable lines to existing electricity poles to minimize environmental impact.                                                        | E&S focal point                                           | Continuous       | No additional cost |
|                                          | N/A                          | Keep minimizing traffic disruption and ensure road safety during drilling and cutting activities by enhance collaboration with local councils      | E&S focal point                                           | Continuous       | No additional cost |
|                                          | N/A                          | Maintaining machinery efficiency, minimizing traffic disruption, ensuring safety                                                                   | E&S focal point                                           | Continuous       | No additional cost |

|                    |                              |                                                                                                      |                 |            |                    |
|--------------------|------------------------------|------------------------------------------------------------------------------------------------------|-----------------|------------|--------------------|
|                    | N/A                          | Continue to uphold the company's established good practices aimed at minimizing nuisance impacts.    | E&S focal point | Continuous | No additional cost |
| Social Environment | Long Term Actions (>6months) |                                                                                                      |                 |            |                    |
|                    | N/A                          | Ensure all workers are aware of and adhere to the OHS policy and plan.                               | Safety Officer  | Continuous | No additional cost |
|                    | N/A                          | maintain GBV prevention clauses in the CoC, and continue implementing corrective actions effectively | HR department   | Continuous | No additional cost |

#### 4.3.4 MASADER schools PV rooftop Solar

**Table 8.** Corrective actions, responsibilities, and timeline for MASADER company.

| Environmental/Social Aspect              | Gaps                           | Task                                                                                                                                                                                                | Responsibility                        | Time to complete | Cost               |
|------------------------------------------|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|------------------|--------------------|
| Institutional arrangement and management | Long Term Actions (> 6 months) |                                                                                                                                                                                                     |                                       |                  |                    |
|                                          | N/A                            | Keep providing timely and effective responses and maintain transparency in the complaint handling process.                                                                                          | IT and Customer Service               | Continuous       | No additional cost |
|                                          | N/A                            | Keep a strength grievance mechanism by providing accessible reporting channels and regularly updating based on feedback. Maintain high safety standards with regular safety audits and inspections. | Safety Officer                        | Continuous       | No additional cost |
| Physical Environment                     | Long Term Actions (>6 months)  |                                                                                                                                                                                                     |                                       |                  |                    |
|                                          | N/A                            | Keep storing all hazardous waste materials according to the Palestinian Hazardous waste management bylaw regulations.                                                                               | Safety Officer                        | Continuous       | No additional cost |
| Social Environment                       | Long Term Actions (> 6 months) |                                                                                                                                                                                                     |                                       |                  |                    |
|                                          | N/A                            | Keep providing employees with multiple reporting channels and enhance air quality monitoring.                                                                                                       | HR and E&S Teams                      | Continuous       | No additional cost |
|                                          | N/A                            | Keep avoiding working during school hours.                                                                                                                                                          | Project management and Safety officer | Continuous       | No additional cost |
|                                          | N/A                            | Keep ensuring preparedness and regularly update the OHS plan to reflect new regulations, industry standards, and feedback from audits and complaints.                                               | Safety Officer                        | Continuous       | No additional cost |
|                                          | N/A                            | Keep a strength community engagement in ongoing project sites to ensure smooth implementation                                                                                                       | Safety Officer                        | Continuous       | No additional cost |