

# Post Evaluation: Environmental and Social Safeguards Management

Gaza Health Emergency Response Project  
(P503036)

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## 1. Introduction

This post-review assesses the environmental and social (E&S) aspects of the portable toilet units' installations and fuel procurement activities conducted under the Gaza Health Emergency Response Project. In the absence of initial E&S guidelines during implementation phase, this report retrospectively evaluates E&S safeguards management activities, identifies key challenges, and outlines recommendations for future E&S actions, with a focus on improvements where needed or feasible.

As part of WHO's due diligence to ensure that retroactive financing activities comply with World Bank Environmental, Social, Health, and Safety (ESHS) standards, a post-evaluation was conducted on the toilet refurbishment and fuel procurement activities, implemented between April to July 2024. The evaluation examines the implementation of mitigation measures for the risks identified during the E&S screening. The annexed screening reports have been reviewed and discussed with the World Bank.

## 2. Portable Toilet Units Deployment: Retrospective Review

### Summary of Implementation

#### **Observations of E&S management:**

Despite the overall implementation of the deployment, several challenges emerged during implementation:

- Our field staff interviewed the supplier to verify compliance with environmental and social standards, including safe construction processes, workers and community safety, and housekeeping measures. The verification of environmental and social measures, including safe construction processes and workers' safety, was conducted informally through continuous communication with the suppliers. Our technical team has confirmed that no incidents occurred during the fabrication or installation process.
- Septic Tank Excavation: The installation of some toilet units required excavation for septic tanks for example at the Kuwaiti Hospital, where 8 portable toilets were installed, each connected to 2 septic tanks, totaling 16 tanks. The excavation reached a depth of 1.5 meters and was completed without any reported worker accidents, indicating adherence to Occupational Health and Safety (OHS) protocols.
- The deployment of portable toilet units in Gaza involved a total of **17 workers**, including both skilled and unskilled labor. The workforce consisted of blacksmiths, tilers, plumbers, and electricians, with 4 additional workers that performed installation at the targeted facilities, provided by contractors.
- The installation process primarily involved setting up portable toilets at key health

facilities, along with any necessary civil works for connection to water and sewage systems. **No children under the age of 15** were involved in either the manufacturing or installation processes, adhering to labor standards.

**E&S aspects during Operation:**

ensure **gender separation**, the toilets were clearly marked for men and women using **stickers and printed signs**, with oversight by the relevant facilities to manage allocation and distribution. This measure helped ensure user comfort and safety.



[Separated and marked toilets]

**Environmentally:**

- The Gaza focal points conducted a visit to the **Kuwaiti Field Hospital** to evaluate the status and **functionality** of the mobile toilets supplied under the project. The primary objectives of this assessment were to ensure that these facilities promote safe excreta disposal effectively and to expand sanitation resources in response to the growing demand.
- Although solid waste leakage is not anticipated, the potential for nitrogen leaching into the surrounding soil remains a concern. This could have minor environmental impacts, particularly in agricultural areas. However, given that no agricultural activities are planned in the area, this risk is deemed low, and mitigation measures have not been prioritized.

## **Key Findings and Future E&S Actions**

### **[Waste Management Improvement]**

- Septic Tank Management (When Security Allows): Supporting development of a waste disposal protocol for septic tanks, including the safe extraction and disposal of waste, particularly in hospitals not connected to sewerage systems. However, due to the current security situation, this step will only be implemented once conditions allow for safe operations. Discussion and coordination are already in place with a number of stakeholders involved in the process including the health authorities, the Joint Services, WHO etc.

### **[Community Engagement and Feedback Mechanism]**

- Community Feedback Mechanism: Supporting the facilities to establish a feedback mechanism for hospital staff and users of the portable toilets to identify any recurring issues or improvements needed. This could involve simple surveys to capture concerns around functionality or hygiene standards.
- Gender-Sensitive Monitoring: Continue monitoring the gender-segregated toilets to ensure they remain clearly marked and accessible. Ensure that any issues regarding gender-based accessibility or comfort are addressed promptly.

### 3. Fuel Procurement and Handling: Retrospective Review

#### Summary of Scope

Fuel procurement for the Gaza Strip has been managed by **UNRWA**, which became the sole procurement channel after UNOPS handed over responsibilities in December 2023. Prior to this, UNOPS had been overseeing procurement but is now limited to monitoring activities. Prior to the war UNRWA used to import to Gaza all the fuel needed for their operations in Gaza including health, education, social services etc. They had the permit to import and procure fuel from external sources without the blue tax and put in place all the logistics and distribution capacity within Gaza including the central storage facility at their log base in Rafah.

Fuel procurement for the health sector during the war operates as follows: needs are first assessed by the **Gaza Health Cluster with support from WHO**, after which UNRWA secures fuel from various sources. Once fuel is procured and delivered, costs are recovered through a **Cost Recovery** mechanism, where expenses are distributed among different UN agencies based on their usage. **WHO is responsible for paying for fuel that is successfully delivered to targeted facilities, confirmed through receipts stamped by beneficiaries. Importantly, there were no incidents reported during the delivery process, ensuring that funds were only expended for fuel that reached its intended destinations without any issues.** The Post Evaluation Report covers the fuel procurement during the period from *April 1 to June 30, 2024*.

One of the main challenges identified was the absence of formal Environmental and Social (E&S) guidelines or Standard Operating Procedures (SOPs) specifically for fuel procurement and distribution. This lack of structured guidelines posed risks in managing issues like security concerns. Although risks of hijacking incidents were raised during fuel transport, it is important to emphasize that none of these incidents affected the successful delivery of fuel under the Bank's fund. No formal response mechanism for these security events is currently in place, though all deliveries during the reporting period were incident-free. UNOPS continues to monitor the process, ensuring that fuel distribution aligns with the agreed allocation mechanism.

#### Monitoring

Since October 20, 2023, fuel has primarily been procured from registered entities in Egypt and transported from Kerem Shalom to UNRWA rented fuel station(s). UNRWA manages fuel allocation and shares with all relevant stakeholders through a spreadsheet.

**UNOPS** is responsible for **monitoring** the process ensuring that the fuel distribution

aligns with the agreed allocation mechanism.

- Fuel Supply Chain Management: UNRWA inspected the fuel before its entry into Gaza, ensuring compliance with quality standards through a Letter of Authorization. UNRWA managed fuel allocations to health facilities based on the agreed Cost Recovery mechanism.

### **Observation of E&S management**

Fuel procurement and handling in Gaza present several critical challenges, the following ES relevant observation:

- No oil spills were notified during the fuel deliveries.
- Hijacking and Security Incidents: **No hijacking incidents** were reported during the fuel deliveries.
- All fuel was successfully delivered to its intended destinations.
- Tanker drivers were regularly updated with road safety guidance to ensure safe and secure deliveries.

### **Key Findings and Future E&S Action**

Given the nature of the fuel procurement process described above, which operates through a cost recovery mechanism, the amount allocated from the World Bank fund has already been fully procured. Therefore, no future action plan is applicable, but key finding could be addressed as below:

- Incident Reporting and Response: Moving forward, establishing a formal incident response mechanism is recommended to preemptively address any future risks. Regularly update road safety guidelines to ensure safe and secure deliveries.

## **Annex. E&S Risk Screening Report**