

Government of the People's Republic of Bangladesh

Local Government Engineering Department
Department of Public Health Engineering
Roads and Highway Department
Bangladesh Power Development Board



Host and Rohingya Enhancement of Lives Project (HELP)

Project Code: P501274

Draft Environmental and Social Management Framework (ESMF)

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Abbreviations and Acronyms

ARIPA	Acquisition and Requisition of Immovable Property Act
BBS	Bangladesh Bureau of Statistics
BP	Bank Policy
DoE	Department of Environment
DPD	Deputy Project Director
DPHE	Department of Public Health Engineering
DRM	Disaster Risk Management
DRP	Displaced Rohingya Population
ECA	Environmental Conservation Act
ECC	Environmental Clearance Certificate
ECR	Environmental Conservation Rules
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GoB	Government of Bangladesh
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HELP	Host and Rohingya Enhancement of Lives Project
HIES	Household Income and Expenditure Survey
IA	Implementing Agency
LGED	Local Government Engineering Department
LGI	Local Government Institution
LIPW	Labor Intensive Public Workfare
LMP	Labor Management Plan
M&E	Monitoring and Evaluation
MIS	Management Information System
MoLGRD&C	Ministry of Local Government, Rural Development and Cooperatives
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
O&M	Operation and Maintenance
PD	Project Director
PDO	Project Development Objective
PIA	Project Influence Area
PIC	Project Implementation Committee
PIU	Project Implementation Unit
PSC	Project Steering Committee
RPF	Resettlement Policy Framework
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference
WASH	Water, Sanitation, and Hygiene
WB	World Bank
WBG	World Bank Group

Executive Summary

Introduction: The World Bank will be supporting the Local Government Engineering Department (LGED) and Department of Public Health Engineering (DPHE) under the Ministry of Local Government, Rural Development and Cooperatives (MoLGRD&C), Roads and Highway Department (RHD) under the Ministry of Road Transport and Bridges (MoRTB) and Bangladesh Power Development Board (BPDB) under the Ministry of Power, Energy and Mineral Resources (MoPEMR) in implementing the “Host and Rohingya Enhancement of Lives Project (HELP)”. The objective of the project is to improve access to basic services and enhance disaster and climate resilience of Displaced Rohingya Population (DRP) in Cox’s Bazar and Bhasan Char, and the host communities Cox’s Bazar, Bandarban and Noakhali districts.

Project components: The project will be implemented by LGED, DPHE, RHD, and BPDB through four Project Implementation Units (PIUs). DPHE will be the implementing agency of Component 1 on resilient water, sanitation and hygiene. Key activities under component 1 are (i) installation of mini piped water supply schemes and point source water options, as well as other rehabilitation works to improve capacity of existing water supply and distribution systems, (ii) rehabilitation and improvement of existing and installation of new household and public/community toilets as well as integrated waste management facilities, and (iii) operations and maintenance (O&M) of new and existing WASH facilities. Installation of safely managed WASH facilities in the host community will contribute to SDG targets 6.1 and 6.2.

Component 2 on Climate and Disaster Resilient Infrastructure, Energy, and Emergency Response, will be implemented by LGED, RHD and BPDB. Key activities under this component are (i) improvement and development of rural infrastructure under the jurisdiction of LGED, (ii) improvement of rural roads under the jurisdiction of RHD, and (iii) construction of a solar power plant in Bhasan Char by BPDB.

Component 3 on Strengthening Institutional Systems to Enhance Service Provision and Support Integrated Resilient Development will be implemented by all four agencies. The key activities are (i) capacity building and technical assistance for the Government of Bangladesh, (ii) awareness raising and skills building program for Host Communities and the DRP, (iii) training of first responders and the Fire Service and Civil Defence, and (iv) project management and innovative technologies for project monitoring and evaluation.

Component 4 is the Contingency Emergency Response (CERC). This will ensure provision of immediate response to an eligible crisis. In the event of an eligible crisis, the proposed project will contribute to providing immediate and effective response to said crisis or emergency. Any unused balance under the first three components can be reallocated to the CERC component, in the event of an emergency. This operation will leverage and scale-up activities in the previous Emergency Multi-Sector Rohingya Crisis Response Project (EMCRP) (P167762) and draw upon recent field and needs assessment carried out.

The project aims to support Displaced Rohingya Population (DRP) residing in 33 camps in Ukhiya and Teknaf Upazilas of Cox’s Bazar District (CXB) and Bhasan Char (BC) island in Noakhali District, as well as the host communities (HC) in CXB District and Bandarban District. Specific locations of subproject activities are not known at this stage, because these will be selected based on the screening and with discussion with RRRC. The subproject locations will be known once the feasibility studies are completed before the project effectiveness.

Summary of Project Activities: LGED, DPHE, RHD and BPDB will coordinate project activities, including day-to-day implementation, coordination, supervision, and overall management of project activities. Overall project activities of the proposed are given below-

- ✓ Rehabilitation of existing water sources to supply 20 to 50 liters of water per person per day, with piped water schemes with a total of 5000 DRP or 2000 host community members served per scheme (Component 1)
- ✓ Small scale Solid waste and Fecal Sludge management plant (Component 1)
- ✓ Usage of solar photovoltaic (PV) pumping systems for the pumping station (Component 1)
- ✓ Solar photovoltaic (PV) nano grid systems Distribution (Component 2)
- ✓ Rehabilitation and re-construction and rehabilitation of bridges and culvert (Component 2).
- ✓ Rehabilitation of existing Jetties in Bhasan Char, and Hatiya, which are currently in degraded condition (Component 2)
- ✓ Rehabilitation of Road for accessing the jetties (Component 2)
- ✓ Rehabilitation of existing multipurpose disaster shelter (Component 2)
- ✓ Installation of sustainable energy system (solar) in Bhasan Char (Component 2)
- ✓ Rehabilitation of roads (Component 2)
- ✓ Minor construction of cold storages and ice mills (Component 2)
- ✓ Minor construction of battery storage (Component 2)
- ✓ Enhancement of sustainable power generation, distribution, and lighting infrastructure, development of light electric vehicle charging stations, and introduction of energy efficient appliances (i.e., induction cook stoves, brushless direct current motor ceiling fans) (Component 2)
- ✓ Slope stabilization (Component 2)

This Environmental and Social Management Framework (ESMF) has been prepared to identify the potential environmental and social risks and impacts of proposed Project activities and propose suitable mitigation measures to manage these risks and impacts. It maps out the Republic of Bangladesh's laws and regulations and the World Bank policies applicable to the Project, and describes the principles, approaches, implementation arrangements, and environmental and social mitigation measures to be followed.

The environmental risk is rated as "Substantial" considering the type, scale of operation, nature, magnitude of potential environmental risks and impacts, and risk of disasters and climate, mainly fire incidents, floods, and landslides. Work at individual locations will involve small to medium scale construction work and are not supposed to have significant environmental impacts. Any project intervention in any areas of environmental and ecological sensitivity and important ecosystem and with high environmental and social risk will be screened out during screening process that also includes following the exclusion list provided in Annex 7

The activities will be spread across camps in Bhasan char, CXB and host communities. Work at individual location will involve small to medium scale construction work and are not supposed to have significant

environmental impacts. The construction and project interventions will not include any areas of environmental and ecological sensitivity and important ecosystem which will be screened out during screening process. The HELP locations are already modified. The risks are mainly during construction phase which are reversible in nature and will be confined within the boundary of the project locations. The risks may include drainage congestion and water logging during the construction period, temporary surface water and ground water pollution, construction related dust, air and noise pollution etc. As shelters will be constructed mostly within the existing school premises, community health and safety, particularly of teachers and students near the construction area will be an issue during construction. The project will pay attention to gender-friendly design and separate toilets for girls and female teachers in the shelters and do construction activities outside of school hours. The construction, repair and rehabilitation of infrastructure conducted under this project will implement energy efficient practices and equipment to reduce GHG emissions associated with the project activities. The project will support integrated waste management within the existing facilities on government land and without any additional land requirement.

The project will support afforestation in collaboration with the Bangladesh Forest Department (through an MOU with LGED). A number of capacity enhancement activities will be implemented through TA to enhance the capacity of the implementing agencies to provide services, operate, and manage climate-resilient infrastructure, and strategically manage the environment of the project areas in the future, etc. A TA in collaboration with the Department of Environment (through an MOU with LGED) will support comprehensive environmental impact and damage assessment. This assessment is expected to take a deep dive into the environmental impacts from the Rohingya influx, including the valuation of ecosystem services to underline the economic benefits of conservation and a strategic environmental assessment for aligning current and future policies, programs, and projects.

The social risk is also rated as “Substantial” due to the increasing social tension between DRP and host community, and possibility of exclusion of vulnerable stakeholders from consultations, owing to their economic status, lack of access to information and decision-making abilities. There will be no land acquisition permitted or required in the host community as the project will only use government land. The risk of labor influx is expected to be minimal as construction activities are expected to largely employ labor from DRP and local people in host communities.

The project will only use government land for road rehabilitation (using existing alignments), shelters on public school lands or other government lands. There may be informal settlers occupying public land in host communities who be displaced and require resettlement assistance according to ESS5. Depending where roads are built, and even when they follow existing alignments, there may be impacts on shops and other private entities. There may also be need for temporary land use for project activities (to keep construction material and set-up labor camps) by the existing rural roads. The extent of such impact will be known upon the confirmation of specific location of subproject and screening of sites and will be managed as per ESS5. The camps in Cox’s Bazar and Bhasan Char are all under government ownership. Inside the camps there may be some in-situ movement of refugees due to construction of toilets, WASH facilities, but these occasions are rare, will be avoided as best possible and managed using existing camp relocation protocols and joint verification with UNHCR.

The potential and mostly typical impacts on the key environmental and social parameters of the project area based on the assessment of project components and the primary assessment of the activities. The overall impact assessment of the proposed project activities to be implemented reveals that most of the

likely adverse impacts could be minimized or eliminated by adopting standard mitigation measures; there is also scope to enhance some of the beneficial impacts to be generated from the proposed project. However, the management of environmental and social impacts will need to be carefully considered.

This project will use a structured approach to environmental and social management to allow the project development process following the newly developed 10 ESSs, follow the mitigation hierarchy of avoidance, minimization, mitigation and compensation/offset for negative impacts and enhancement of positive impacts where practically feasible

Implementation Arrangements: DPHE, LGED, RHD and BPDB are the project implementation agencies and responsible for managing the E&S risks of the project, including implementation of ESMP, RAP (if required), Small Ethnic Community Planning Framework (SECPF), Gender and SEA/SH Prevention Plan, RPF, SEP and LMP through its existing structures. The project management team will be recruited or delegated from the existing IAs team for this purpose. For efficient and smooth implementation of the project, suitable institutional arrangements are necessary to manage and implement the proposed project relevant social and environmental management planning documents. A total of four project management units (PIUs) established will be responsible for day-to-day overall management and implementation of the Project and coordinating with the relevant Government and Donor (World Bank) agencies. The LGED, DPHE, RHD and BPDB will be the Implementing agencies and be responsible for the overall technical supervision and execution of the Project.

Environmental and social training will help ensure that the requirements of the ESS and subsequent social impacts and risks are clearly understood and followed by all project personnel throughout the project period. The PIUs will ensure, in collaboration with the PSC that these training is provided to all Project personnel. The social and environmental training program will be finalized before the commencement of the project. The training will be provided to the LGED, DPHE, RHD and BPDB representatives, staffs, contractors, NGOs and other staffs engaged in the Project. Training will cover all staff levels, ranging from the management and supervisory to the skilled and unskilled categories. The scope of the training will cover general environmental and social awareness, key environmental and social impacts of the program, ESMP requirement, OHS aspects and GBV. Different training programs will be initiated which can be realigned based on the needs.

Monitoring: PIUs will conduct regular monitoring and evaluation of the updating and implementation of the ESMF. Monitoring and evaluation are intended to help ensure that the resettlement action plan is prepared and implemented according to the resettlement policy framework. Moreover, LGED will also hire an M&E firm to perform M&E of all project activities, and a feasibility study firm. M&E firm will establish dialogue with the affected communities and ensure that their concerns and suggestions are incorporated and implemented in the project. M&E firm will work closely with the PIUs and internal monitoring team to implement the ESMP and other plans. The PIUs will prepare a monthly report summarizing the following:

- Progress in implementing ESMP and subsequent other E&S documents, etc.
- Findings of the monitoring programs, with emphasis on any breaches of the control standards, action levels or standards of general site management.
- Summary of any complaints by external bodies and actions taken / to be taken; and
- Relevant changes or possible changes in legislation, regulations and international practices.

Stakeholder Engagement: A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. Project-affected-people for the activities in the proposed project and any other stakeholder may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). An accessible and responsive complaint management process is an important part of any stakeholder engagement strategy. The GRM will be accessible to all types of stakeholders, including affected people, community members, civil society, media, vulnerable people, and other interested parties. External stakeholders including international and regional can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the proposed project. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. Grievance redress committees (GRC) will be formed to receive and resolve complaints as well as grievances from aggrieved persons from the local stakeholders including the project-affected persons. The GRC will be established at three levels: (i)Local Level and(ii) Project level and (iii) Ministry level.

1. Introduction

This Environmental and Social Management Framework (ESMF) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank in the “Host and Rohingya Enhancement of Lives Project(HELP)”. The project will support to improve access to basic services and enhance disaster and climate resilience of Displaced DRP of Cox’s Bazar and Bhasan Char, and the host communities Cox’s Bazar, Bandarban and Hatiya, Noakhali districts. The Local LGED, DPHE, RHD and BPDB will be implementing the Project activities.

This ESMF follows the World Bank Environmental and Social Framework (ESF) as well as the national laws and regulations of the People’s Republic of Bangladesh. The objective of the ESMF is to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. More specifically, the ESMF aims to (a) assess the potential environmental and social risks and impacts of the HELP Project and propose mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF.

This ESMF should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP), SEA/SH Prevention Plan and Resettlement Policy Framework (RPF). The ESMF will be a living document and will be reviewed and updated as and when required.

2. Project Description

Bangladesh has been coping with the sudden and large inflow of the Rohingya population displaced from Myanmar since 2017. The extended presence of the Displaced Rohingya Population (DRP) puts additional pressure on already poor areas, affecting livelihoods, services, and social cohesion. The DRP outnumber the host communities in Ukhiya and Teknaf by a factor of three. Hosting the DRP continues to stretch service delivery of the Government of Bangladesh (GoB), including for host communities, amidst decreasing humanitarian resources. Even as the humanitarian emergency evolves to a protracted crisis, the GoB has demonstrated its continued commitment and leadership to support the DRP.

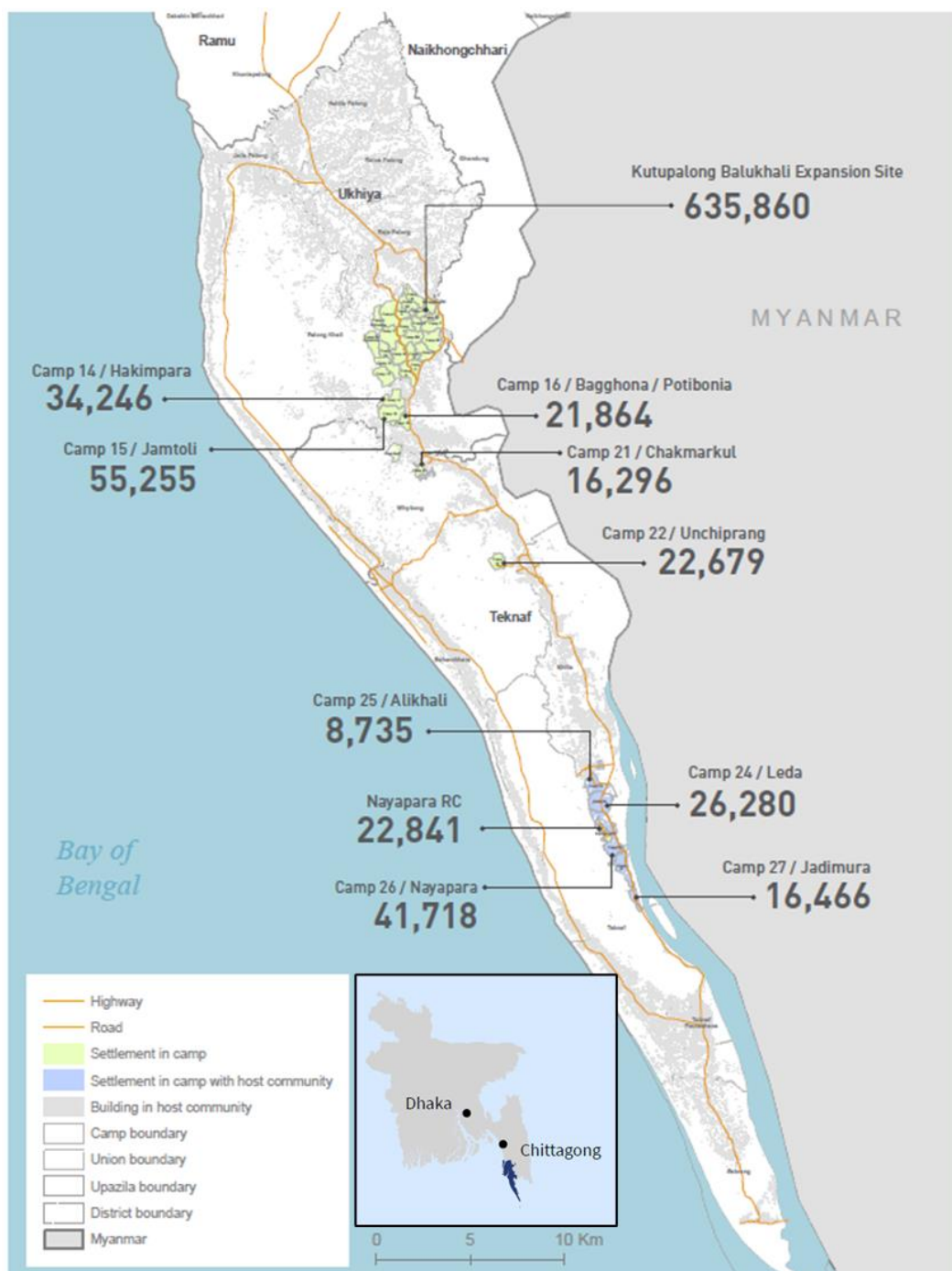
The project is designed to provide support to Displaced Rohingya People (DRP) and the host communities in fulfilling basic needs and improving livelihoods. In the Cox’s Bazar camps and the surrounding host communities, significant fraction of population does not have adequate access basic WASH facilities. 46 percent of host community households and 17 percent of DRP households use unimproved sanitation facilities.¹ Even though DRP households have relatively better access to sanitation facilities than host communities, capacity of these facilities remains constrained as compared to the service demands. For instance, most of the community facilities are shared by more than 20 families for drinking water which leads to access, safety and gender violence related issues. To reduce the strain on livelihoods and basic service delivery in Cox’s Bazar, the GoB has facilitated the voluntary

¹ World Bank. September 2023, ‘Living Conditions Brief, Cox’s Bazar Panel Survey Round 2 (2023)’.

relocation of around 30,000 DRP to Bhasan Char since 2021. Bhasan Char, an island located in the Bay of Bengal in the Noakhali District, emerged in 2006 as an island formed of Himalayan silt and sediments. The GoB has invested around US\$400 million to make the island livable. Notable infrastructure developments include an 11km embankment to protect 1700 hectares of land; 1440 housing facilities; 120 cyclone shelters; one government hospital; 29 schools; and WASH facilities supported by about 1.8MWp centralized and standalone solar PV based power systems.² Among many, key needs in Bhasan Char include improvement and maintenance of existing infrastructure; accessibility to neighboring lands; and health, livelihoods and education.

At least 637,000 DRP and host community living in Cox's Bazar, Bhasan Char, and Noakhali, are direct project beneficiaries. The improvement of climate-resilient transport infrastructure can indirectly benefit people beyond the project areas that utilize the infrastructure. Approximately 317,000 DRP and 320,000 host community population will have improved access to basic services, including WASH. Out of them, 112,500 host community population will benefit from increased disaster protection standard and increased access to multipurpose disaster shelters. All the 32,000 DRP population living in Bhasan Char will benefit from improved electricity supply through the solar power plant. Maps of the project areas are given below.

² Bangladesh Navy. September 2023.



Source: 2023 Join Response Plan Rohingya Humanitarian Crisis.

Figure 2.1: Maps of the project areas in Cox's Bazar District where the interventions will be implemented across (The Rohingya camps areas are highlighted in light green and light blue. Numbers indicate population projection for 2023 in each camp)



Source: 2023 Joint Response Plan Rohingya Humanitarian Crisis.

Figure 2.2: Map of Bhasan Char and surrounding areas in the Bay of Bengal (Only DRP reside in Bhasan Char island and host communities are the surrounding Chattogram and Noakhali districts. Date of creation: November 2022)

Project Components: There are four components in this project and detail of these four components are depicted below.

<p>Component 1: Resilient Water, Sanitation, and Hygiene (WASH)</p>	<p>DPHE will implement this component, including:</p> <ul style="list-style-type: none"> • Constructing more mini piped water supply schemes and point source water options in Host Communities • Rehabilitating existing water supply and distribution facilities and infrastructure Operating and maintaining new and existing facilities, especially in DRP camps in Cox’s Bazar and Bhasan Char, using solar PV pumping systems • Building or upgrading twin pit toilets and public toilets in Host Communities • Improving existing household toilets and community latrines in DRP camps • Constructing integrated waste management facilities, including solid waste management and fecal sludge treatment plants, in both Host Communities and DRP camps • Supplying additional menstrual health and hygiene (MHH) kits for women • Operating and maintaining selected sanitation and hygiene facilities constructed under EMCRP and HELP, especially in camps.
<p>Component 2: Climate and Disaster Resilient Infrastructure, Energy, and Emergency Response</p>	<p><i>Subcomponent 2.1: Rural infrastructure development (implemented by LGED)</i></p> <ul style="list-style-type: none"> • Construction of multipurpose disaster shelters and expanding existing shelters cum primary schools by adding one floor • Rehabilitating rural roads under LGED’s jurisdiction with minor capacity enhancements, including roadside drainage and slope stabilization • Reconstruction/rehabilitation of climate-resilient bridges under LGED’s jurisdiction • Rehabilitating landing stages in Hatiyaupazila (for Host Communities) and in Bhasan Char (for the DRP) • Installing lightning protection systems and solar streetlights • Improving rural markets (hat-bazar) and repairing their roadside drainage networks • Constructing and operating cold storage in Hatiya (for Host Communities) and in Bhasan Char (for the DRP) • Constructing an Emergency Operation Center (EOC) for strategic coordination during disasters and emergencies • Supplying fire safety and search and rescue equipment • Conducting small-scale afforestation activities in Bhasan Char by the Bangladesh Forest Department (BFD) through a Memorandum of Understanding (MoU) with LGED • Operating and maintaining existing basic infrastructure in DRP camps, including renewable energy infrastructure in Bhasan Char, until the commissioning of the proposed solar power plant <p><i>Subcomponent 2.2: Rural roads improvement (implemented by RHD)</i></p>

	<p>This subcomponent will improve access and connectivity through:</p> <ul style="list-style-type: none"> • rehabilitation of existing rural roads with minor enhancement of capacity under RHD's jurisdiction³ • re-construction of climate resilient access and evacuation bridges under RHD's jurisdiction. • installation road accessories and protective measures like drainage and slope stabilization. <p><i>Subcomponent 2.3: Renewable energy</i></p> <p>Implemented by the Bangladesh Power Development Board (BPDB), this subcomponent will finance the construction of a solar power plant in Bhasan Char DRP camps, using battery energy storage systems (BESS) backed up by a diesel generator.</p>
Component 3: Strengthening Institutional Systems to Enhance Service Provision and Support Integrated Resilient Development	<p><i>Subcomponent 3.1: GoB capacity building and technical assistance (implemented by all IAs)</i></p> <p>(i) Agency-specific capacity building activities: Capacity building sessions will be held separately for each agency, covering topics such as emergency response, sustainable operation and maintenance, climate-resilient planning, integration of climate adaptation and disaster risk management, and renewable energy technologies and policies.</p> <p>(ii) Technical assistance and analytical studies: Activities will encompass assessing groundwater vulnerability, implementing ICT-based water quality monitoring, conducting feasibility studies for surface water supply schemes, seeking private-sector solutions for service improvement, innovating road construction for climate resilience, and evaluating policies for green energy adoption.</p> <p>(iii) A comprehensive environmental impact and damage assessment: The project will fund an environmental impact assessment in DRP-affected areas, led by the Department of Environment (DoE) through an MoU with LGED. LGED will manage funds and implementation. The assessment will value ecosystem services, guide policy alignment, and craft an environmental management plan for ongoing restoration efforts.</p> <p><i>Subcomponent 3.2: Host Communities and DRP awareness raising and skills building programs:</i> This subcomponent aims to raise awareness and build skills for both Host Communities and DRP. DPHE will focus on WASH training, emphasizing basic facility maintenance and hygiene promotion, while LGED will implement disaster risk management and emergency response programs, enhancing community resilience through early-warning systems, evacuation planning, and inclusive disaster management activities.</p> <p><i>Subcomponent 3.3: Reinforcing the Emergency Management Capacity (implemented by LGED):</i> This subcomponent will improve emergency response capacity for both Host Communities and DRP through training of first responders</p>

	<p>and the Fire Service and Civil Defense (FSCD)</p> <p><i>Subcomponent 3.4: Technology-driven M&E and project management:</i> Implemented by DPHE, LGED, RHD, and BPDB, this subcomponent finances the development of a digitized construction monitoring system and project management. The system modernizes remote supervision through technology procurement and skills building. It includes evaluating current capacities, procuring ICT equipment, and providing comprehensive training. Additionally, it covers day-to-day administration, management, and coordination of project activities.</p>
Component 4: Contingency Emergency Response (CERC)	This will ensure provision of immediate response to an eligible crisis. In such an event, the component will contribute to immediate and effective response. Any unused balance under the other components can be reallocated to the CERC component, in the event of an emergency.

3. Environmental and Social Policies, Regulations, and Laws

This Section presents a review of the national policy, legal, and regulatory framework relevant to the environmental and social aspects of the project. In addition to the national environmental and social framework, World Bank environmental and social standards are also discussed.

3.1 GoB policy Framework

All relevant applicable national acts, policies, strategies, plans, acts, rules and regulations of Government of Bangladesh pertaining to the environment and social aspects relevance to this project is presented in Table below.

Table 3.1: Summary of applicable environmental, social regulations of GoB

Sl. No.	Policies/Act/Rules	Key provisions and purpose	Applicability to the projects
1	Environment Conservation Rules, 2023	National Environment Quality Standards for surface water (inland and marine/coastal), drinking water, sewage effluent, industrial effluents, liquid waste discharge standards industry wise, etc.;Categorization of industries, development projects, and other activities based on actual and anticipated pollution load. ; Procedure for obtaining Environment Clearance Certificate (ECC). ; Requirements for undertaking IEE and EIA's as well as formulating EMP according to categories of industries/development projects/ activities;Procedure for damage claim by persons affected or likely to be	Applicable as the environmental conservation rules will ensure conservation of the natural resources.

Sl. No.	Policies/Act/Rules	Key provisions and purpose	Applicability to the projects
		affected due to polluting activities or activities causing hindrance to normal civic life	
2	National Environmental Policy, 2018	Major elements of the policy are- Natural equilibrium provision and overall development of the country through environmental protection and sustainable management ;Encourage collection and promotion of low carbon emission technology in the country ;Identifying and controlling all types of environmental pollution and degradation activities ; Ensure environmental development in all fields ; Ensure sustainable, long term, and environmentally friendly use of all-natural resources ;Maintain and streamline the environmental policies and strategies among other policy strategies in the interest of sustainable development ;Ensure the Environmental Impact Assessment and Strategic Environmental Assessment in all necessary sectors ; Actively involved as much as possible with all international environmental initiatives and take necessary actions at local and national levels.	Applicable as the environmental policy aims at prevention of pollution and degradation of resources.
3	Bangladesh Environmental Conservation Act (ECA), 1995 and subsequent amendments in 2000 2002, 2010	Define Applicability of environmental clearance; Regulation of development activities from environmental perspective; Framing applicable limits for emissions and effluents; Framing of standards for air, water, and noise quality ;Formulation of guidelines relating to control and mitigation of environmental pollution, conservation, and improvement of environment ; Declaration of Ecologically critical area	Applicable as the proposed project activity associated with environmental issues
4	Environment Conservation Rules 1997 and Subsequent amendments in 2002,2003 and 2010	Declaration of Ecologically critical areas; Requirement of environmental clearance certificate for various categories of projects; Requirement of IEE/EIA as per category; Renewal of the environmental clearance certificate within 30 days after the expiry ; Provides standards for quality of air, water and sound and acceptable limits for emissions/discharges from vehicles and other sources	Applicable Projects falls under Red Category and require EIA approval prior to start construction and environmental Clearance Certificate prior to start of operation

Sl. No.	Policies/Act/Rules	Key provisions and purpose	Applicability to the projects
5	Environment Conservation Rules, 2023	National Environment Quality Standards for surface water (inland and marine/coastal), drinking water, sewage effluent, industrial effluents, liquid waste discharge standards industry wise, etc.; Categorization of industries, development projects, and other activities based on actual and anticipated pollution load; Procedure for obtaining Environment Clearance Certificate (ECC); Requirements for undertaking IEE and EIA's as well as formulating EMP according to categories of industries/development projects/ activities; Procedure for damage claim by persons affected or likely to be affected due to polluting activities or activities causing hindrance to normal civic life	Applicable as project needs to be complied with the compliance requirements of ECR, 2023.
6	Bangladesh Environment Court Act, 2000 and subsequent amendments in 2019	GoB has given the highest priority to environmental pollution; Passed 'Environment Court Act, 2000 for completing environmentrelated legal proceedings effectively ; Provides the Jurisdictions of the environment court, the penalty for violation, trial procedure in special magistrate's court, the power of entry and search, the procedure for investigation, procedure, and power of environment court, the authority of the environment court to inspect, appeal procedure and formation of the environment appeal court.	Applicable for completing environmental legal requirements effectively
7	The Vehicle Act, 1927; The Motor Vehicles Ordinance, 1983; and The Bengal Motor Vehicle Rules, 1940	Exhaust emissions; Vehicular air and noise pollution; Road/traffic safety; Vehicle Licensing and Registration; Fitness of Motor Vehicles; Parking by-laws.	Applicable for the proposed Project as the goods and equipment will be carried by road as well.
8	National Biodiversity Strategy and Action Plan (2004)	Conserve and restore the biodiversity of the country for the well-being of the present and future generations; Maintain and improve environmental stability for ecosystems; Ensure the preservation of the unique biological heritage of the nation for the benefit of the present and future generations; Guarantee the safe passage and conservation	Applicable for conservation of biodiversity in the study area including water body

Sl. No.	Policies/Act/Rules	Key provisions and purpose	Applicability to the projects
		of globally endangered migratory species, especially birds and mammals in the country; Stop the introduction of invasive alien species, genetically modified organisms and living modified organisms	
9	The Protection and Conservation of Fish Act (1950) subsequent amendments in 1982	Protection and conservation of fish in Government-owned water bodies	Applicable for the conservation of fish as the project construction activity may impact on natural water body.
10	Biodiversity Act, 2017	It provides for the creation of the National Committee and the Biodiversity Management and Surveillance Committees at local levels (i.e., Districts, Upazilas, Municipalities, and Unions). In general, all these committees are mandated to assist the Government in implementing the National Biodiversity Strategy and Action Plan (NBSAP) and to visit the biodiversity enriched areas in their respective territories; and monitor the progress of implementation of the NBSAP.	Yes, projects need to include these local committees, so that they can monitor project impact on the local biodiversity.
11	Forest Act 1927 (Amendment 2000)	The act empowers the government to regulate the felling, extraction, and transport of forest produce in the country.	Yes, sub-projects may include falling of trees and social forestry.
12	The National Water Policy, 1999	Protection, restoration, and enhancement of water resources; Protection of water quality, including strengthening regulations concerning agrochemicals and industrial effluent; Sanitation and potable water; Fish and fisheries; Participation of local communities in all water sector development	Applicable for the preservation of water quality.
13	National Fisheries Policy, 1998	Preservation, management, and exploitation of fisheries resources; Fish cultivation and management; Prawn and fish cultivation in coastal areas; Preservation, management, and exploitation of sea fishery resources	Applicable for the preservation of fisheries resources
14	Bangladesh Water Act, 2013	As per this Act, all forms of water (e.g., surface water, ground water, sea water, rainwater, and atmospheric water) within the territory of Bangladesh belong to the government on behalf of the people. Without prior permission issued by the Executive Committee, no individuals or organizations will be allowed to extract, distribute, use,	Applicable as the project is bound to comply with or consider the requirements under this policy in its design.

Sl. No.	Policies/Act/Rules	Key provisions and purpose	Applicability to the projects
		develop, protect, and conserve water resources, nor they will be allowed to build any structure that impede the natural flow of rivers and creeks.	
15	Bangladesh Labor Act, 2006, Bangladesh Labor Rules, 2015	Provides health, safety, and well-being of the workforce during the project life cycle. In addition, it also stipulated that children under 18 years are not allowed to be employed during the project life cycle.	Applicable as skill, semiskilled and day labor will be worked in the project.
16	The Noise Pollution Control Rules, 2006	The Noise Pollution Control Rules have been established in order to manage noise generating activities which have the potential to impact the health and wellbeing of workers and the surrounding communities.	Applicable as workers will involve during the construction and operation of the project
17	Road Transport Act, 2018	The new Road Transport Act 2018 has finally come into effect at the start of November. After the long-standing Motor Vehicle Ordinance of 1983, the new act introduces a myriad of updated laws and adds new definitions for what constitutes an offence, with most of the fines and punishments receiving major bumps.	Applicable as sub-projects will use heavy vehicles, deploy drivers and operators of machineries during construction period. Project may cause traffic due to waste vehicle movement
18	Rules for Removal of Wrecks and Obstructions in inland Navigable Water Ways (1973)	Rules for removal of wrecks and obstructions	Applicable as if obstruct natural canals/rivers or any other natural water ways (includes seasonal water bodies).
19	The Ground Water Management Ordinance (1985)	Management of groundwater resources; Installation of tube- wells at any place after licensing from Upazilla Parishad only	The proposed Project is likely to have interaction surface water as well as groundwater.
21	Acquisition and Requisition of Immovable Property Act, 2017	The principal legal instrument governing land acquisition in Bangladesh is the Acquisition and Requisition of Immovable Property.	Applicable, but project will not require any land acquisition for the project activities as all activities will be on government land. A RPF has been prepared for this project.
22	The building construction Act 1952 and subsequent	This act provides for prevention of haphazard construction of building and excavation of tanks which are likely to interfere with the planning of certain areas in Bangladesh	Applicable due to structure will be constructed in the project area

Sl. No.	Policies/Act/Rules	Key provisions and purpose	Applicability to the projects
	amendments		
23	Disaster Management Act, 2012	To make the activities about disaster management coordinated, objectoriented, and strengthened and to formulate rules to build up the infrastructure of effective disaster management to fight all types of disaster	Applicable, as the project is in a cyclone-prone area
224	The Electricity Act, 2018 and Amendment and The Electricity Rules,2020	Law relating to the supply and use of electrical energy	Applicable as the project is related to photovoltaic (PV) pumping systems for the pumping station
Source: Website of DoE, Legislative and Parliamentary Affairs Division, Bangladesh Laws, and Bangladesh Board of Investment: Business Law			

3.2 World Bank's Environmental and Social Framework

Since October 2018, all World Bank funded Investment Project Financing (IPF) are required to follow the Environmental and Social Framework (ESF) consisting of ten (10) Environment and Social Standards (ESSs). These ESSs set out their requirement for the proposed project relating to the identification and assessment of environmental and social risks and impacts associated with the project. A brief description of the 10 ESSs, their objectives and requirements and relevance to this project are appended in Table below.

Table 3.2: WB ESS requirements and relevance to the project

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
World Bank Environment and Social Policy for Investment Project Financing	It sets out the mandatory requirements of the Bank in relation to the projects it supports through Investment Project Financing.	The types of E&S risk and impacts that should be considered in the environmental and social assessment. The use and strengthening of the Borrower's environmental and social framework for the assessment, development and implementation of World Bank financed projects where appropriate.	Relevant to the project

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
ESS-1 Assessment and Management of Environmental and Social Risks and Impacts	Identify, assess, evaluate, and manage environment and social risks and impacts in a manner consistent with the ESF. Adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities	The types of E&S risk and impacts that should be considered in the environmental and social assessment. The use and strengthening of the Borrower's environmental and social framework for the assessment, development and implementation of World Bank financed projects where appropriate.	Relevant to the project. E&S risks and Impacts have been preliminary identified based on consultations with primary stakeholders including communities and implementing agency.
ESS-2 Labor-and-Working-Conditions	Promote safety and health at work. Promote the fair treatment, non-discrimination, and equal opportunity of project workers. Protect project workers, with particular emphasis on vulnerable workers. Prevent the use of all forms of forced labor and child labor. Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. Provide project workers with accessible means to raise workplace concerns.	Requirements for the borrower to prepare and adopt labor management procedures. Provisions on the treatment of direct, contracted, community, and primary supply workers, and government civil servants. Requirements on terms and conditions of work, non-discrimination and equal opportunity and workers organizations. Provisions on child labor and forced labor. Requirements on occupational health and safety, in keeping with the World Bank Group's Environmental, Health, and Safety Guidelines (EHSG).	Relevant to the project. A separate LMP has been prepared, which defines measures to be taken to address this ESS2.
ESS-3 Resource-Efficiency-and-Pollution-Prevention-and-Management	Promote the sustainable use of resources, including energy, water, and raw materials. Avoid or minimize adverse impacts on human health and the environment caused by pollution from project activities. Avoid or minimize project-related emissions of short and long-	The project is likely to generate a significant amount of solid and liquid wastes. These may affect the health of health professional, local communities, and the environment. In line with the guidance of this ESS Waste Management Plan	Relevant to the project, as significant amount of wastes will be generated. A separate Waste Management Plan has been developed to address liquid waste and general solid wastes management issues. Waste collection

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
	lived climate pollutants. Avoid or minimize generation of hazardous and non-hazardous waste. Minimize and manage the risks and impacts associated with pesticide use. Requires technically and financially feasible measures to improve efficient consumption of energy, water, and raw materials, and introduces specific requirements for water efficiency where a project has high water demand.	(WMP), (including solid and liquid waste management) will be prepared. The plan will include separation of different kinds of waste, treatment, reuse, recycle and transportation, storage and final disposal of wastes in approved sites/ through incineration/microwave-based technology and other methods as per ESS 3 and related ESHGs, GIIP, WHO guidelines and national law.	system for the Fecal Sludge Management (FSM) and Solid Waste Management (SWM) system including collection and transportation will be supported by the project. The project will make sure the waste collection system at point zero follows ESSs.
ESS-4 Community-Health-and-Safety	Anticipate or avoid adverse impacts on the health and safety of project-affected communities during project life cycle from routine and non-routine circumstances. Promote quality, safety, and climate change considerations in infrastructure design and construction, including dams. Avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. Have in place effective measures to address emergency events. Ensure that safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.	Requirements on infrastructure, considering safety and climate change, and applying the concept of universal access, where technically and financially feasible. Addresses risks arising from impacts on provisioning and regulating ecosystem service. Measures to avoid or minimize the risk of water-related, communicable, and non-communicable diseases. Requirements to assess risks associated with security personnel, and review and report unlawful and abusive acts to relevant authorities. Project will have FSM and SWM facilities so the community risks of exposure for their health will need to be addressed beginning at the collection	Relevant to the project including the collection of fecal and solid wastes.

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
		points of fecal sludge and solid wastes.	
ESS-5 Land-Acquisition- Restrictions-on-Land- Use-and-Involuntary- Resettlement	Avoid or minimize involuntary resettlement by exploring project design alternatives. Avoid forced eviction. Mitigate unavoidable adverse impacts from land acquisition or restrictions on land use by providing compensation at replacement cost and assisting displaced persons in their efforts to improve, or at least restore, livelihoods and living standards to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.	Applies to temporary physical and economic displacement resulting from different types of activities. Does not apply to voluntary market transactions, except where these affects third parties. Provides criteria for “voluntary” land donations, sale of community land, and parties obtaining income from illegal rentals. Prohibits forced eviction (removal against the will of affected people, without legal and other protection including all applicable procedures and principles in ESS5).	Relevant to the project. A separate RPF has been prepared to address this ESS5. Land acquisition and voluntary land donation is not allowed in this project.
ESS-6 Biodiversity- Conservation	Protect and conserve biodiversity and habitats. Apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. Promote the sustainable management of living natural resources.	Requirements for projects affecting areas that are legally protected designated for protection or regionally/internationally recognized to be of high biodiversity value. Requirements on sustainable management of living natural resources, including primary production and harvesting, distinguishing between small-scale and commercial activities. Requirements relating to primary suppliers, where a project is purchasing natural resource commodities, including food, timber and fiber.	Relevant to the project

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
ESS-7 Indigenous-Peoples	Ensure that the development process fosters full respect for affected parties' human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods. Promote sustainable development benefits and opportunities in a manner that is accessible, culturally appropriate and inclusive. Improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with affected parties. Obtain the Free, Prior, and Informed Consent (FPIC) of affected parties in three circumstances. Recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.	Applies when the Indigenous Peoples are present or have a collective attachment to the land, whether they are affected positively or negatively and regardless of economic, political, or social vulnerability. The option to use different terminologies for groups that meet the criteria set out in the Standard. The use of national screening processes, providing these meet World Bank criteria and requirements. Coverage of forest dwellers, hunter gatherers, and pastoralists and other nomadic groups. Requirements for meaningful consultation tailored to affected parties and a grievance mechanism. Requirements for a process of free, prior and informed consent in three circumstances.	Relevant to the project. A SECPF will be prepared. However, any displacement or adverse negative impacts on Small Ethnic Communities (SECs) requiring Free, Prior Informed Consent (FPIC) is not allowed.
ESS-8 Cultural-Heritage	Protect cultural heritage from the adverse impacts of project activities and support its preservation. Address cultural heritage as an integral aspect of sustainable development. Promote meaningful consultation with stakeholders regarding cultural heritage. Promote the equitable sharing of benefits from the use of cultural heritage.	Requires a chance finds procedure to be established. Recognition of the need to ensure peoples' continued access to culturally important sites, as well as the need for confidentiality when revealing information about cultural heritage assets that would compromise or jeopardize their safety or integrity.	Not relevant to the project
ESS-9 Financial-Intermediaries	Sets out how Financial Intermediaries (FI) will assess	Financial Intermediaries (FIs) to have an	Not relevant to the project there is no

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
	and manage environmental and social risks and impacts associated with the subprojects it finances. Promote good environmental and social management practices in the subprojects the FI finance. Promote good environmental and sound human resources management within the FI.	Environmental and Social Management System (ESMS) - a system for identifying, assessing, managing, and monitoring the environmental and social risks and impacts of FI subprojects on an ongoing basis.	financial intermediary involved.
ESS-10 Stakeholder-Engagement-and-Information-Disclosure	Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them. Assess stakeholder interest and support for the project and enable stakeholders' views to be taken into account in project design. Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle. Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.	Requires stakeholder engagement throughout the project life cycle, and preparation and implementation of a Stakeholder Engagement Plan (SEP). Requires early identification of stakeholders, both project-affected parties and other interested parties, and clarification on how effective engagement takes place. Stakeholder engagement to be conducted in a manner proportionate to the nature, scale, risks and impacts of the project, and appropriate to stakeholders' interests. Specifies what is required for information disclosure and to achieve meaningful consultation.	Relevant to the project. A separate SEP has been prepared to address ESS10.
Environmental and Social Directive for Investment Project Financing	This Directive applies to the Bank and sets out the mandatory requirements for the implementation of the Environmental and Social Policy for Investment Project Financing (IPF).	It lays down the following responsibilities of the Bank to manage ES risks and impacts as below: a) undertake its own due diligence of the ES risks and impacts related to the Project; b) support the Borrower to engage in	Applies to Bank in addressing E&S aspects of this project

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
		meaningful consultation with stakeholders, in particular affected communities, and in providing Project-based grievance mechanisms; c) assist the Borrower in identifying appropriate methods and tools to assess and manage the potential ES risks and impacts of the Project; d) agree with the Borrower on the conditions under which the Bank is prepared to provide support to the Project, as set out in the ESCP; and e) monitor the ES performance of a Project in accordance with the ESCP and the ESSs.	
Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups	This Directive establishes directions for Bank staff regarding due diligence obligations relating to the identification of, and mitigation of risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable.	It requires the Bank task team to support the borrower in establishing arrangements for the undertaking and preparation of the environmental and social assessment of the project as required by ESS1. It reviews the terms of reference for the environmental and social assessment to verify that (a) identifies (or requires the identification of) groups or individuals affected by the project that may be disadvantaged or vulnerable; and (b) requires an assessment of project risks and impacts, and identification of differentiated mitigation measures, as they pertain	Applies to Bank in addressing E&S risks and impacts on disadvantaged and vulnerable persons or groups that are identified in this project corridor

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
		to the disadvantaged or vulnerable individuals or groups that are identified.	
World Bank's Guidance note on managing the risks of adverse impacts on communities from temporary project induced labor influx, 2016	The document provides guidelines to address issues and risks arising from influx of migrant labor leading to gender-based violence, forced labor etc.	Requires HPRIDC to prepare a labor influx management and GBV risk mitigation plan	Relevant to the project

GAP analysis of World bank requirements and national laws: Infrastructure development and use of public and private lands for land-based developments are governed by institutional legal mandates and national laws of land acquisition and management. There are some gaps between existing land acquisition law of the country and WB ESSs on Involuntary Resettlement and on indigenous peoples in terms of identification of affected persons and compensation packages, and participation of community groups of diverse interests and vulnerabilities. Gaps between GoB LA law (new Act 21 of 2017) and suggested gap filling measures are given in Table 3.3 below.

Table 3.3: World Bank Standards and Key Gaps with the National Framework

WB ESF Standard	Gaps with GoB law	GAP Filling Measures
ESS1: Assessment and Management of Environmental and Social Impacts and Risks	(i) ESIA study screening and scoping do not guarantee coverage of all ESS standards in the assessment. (ii) The stakeholder engagement during the conduct of the ESIA is limited and the ESIA report is not disclosed. (iii) The ESIA system in Bangladesh does not require analysis of alternatives.	<ul style="list-style-type: none"> Detailed screening will be conducted. ESIA and ESMP will be prepared
ESS2: Labor and Working Conditions	The Labor Act 2006 does not specifically require that development be assessed and reviewed in terms of labor and working conditions including OHS requirements before approval. (ii) The Labor Act 2006 does not require development projects to prepare Labor Management Plans/Procedure or OHS Plan.	<ul style="list-style-type: none"> LMP has been prepared following the GoB and ESF LMP will be part of the bidding documents
ESS3: Resource Efficiency and Pollution Prevention and	Existing energy and water conservation policies, laws and regulations do not require development projects to assess	Project will incorporate resource efficiency measures ⁴ in its ES risk management plans including

⁴Solar power system, use of other resources like water, construction materials and their sourcing, design considering reduction of GHG, waste and their proper management etc.

WB ESF Standard	Gaps with GoB law	GAP Filling Measures
Management	resource efficiency issues and incorporate resource efficiency measures in their ES risk management plans.	development of waste management/e-waste management plan.
ESS4: Community Health and Safety	Covered under ESIA but the systems do not provide clear requirements for the development project and implementation.	LMP covers the community health and safety requirements. Gender and SEA/SH Prevention Plan has been prepared.
ESS5: Land Acquisition, Land Use Restriction and Involuntary Resettlement	<p>(i) No land acquisition required for this project as all project activities will be conducted on the existing government land.</p> <p>(i) Preparation of RAP not required.</p> <p>(iii) Does not provide compensation or assistance to those who are none-title holders.</p> <p>(iv) Does not have provisions to include transitional allowances for the restoration of livelihoods for informal settlers.</p> <p>(v) focused on cash compensation which may be viewed as a short-term strategy, however involuntary resettlement can cause long term impacts. ARIPA does not include sustainable or inclusive developmental objectives.</p> <p>(vi) No special provisions specific groups such as the vulnerable groups of the population</p>	RPF has been prepared. Based on the detailed screening and if screening outcomes warrant, RAP will be prepared.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	No equivalent requirements on: (i) the application of hierarchy of measures; (ii) the preparation of Biodiversity Management Plan; (iii) differentiated measures on types of habitats; (iii) conducting due diligence on primary suppliers.	This applicable to the project. HELP will not engage in any activity that will modify the natural habitat or reserved forest in any capacity though lessons from EMCPR show that camp areas are already modified habitat and BC is also an already developed location. Most project activities will focus on existing infrastructure, such as roads and schools. If there is a possibility of impacts on wildlife habitats, reserved forests, or ecologically sensitive areas, depending on the location of this infrastructure, the activities will be screened out

WB ESF Standard	Gaps with GoB law	GAP Filling Measures
		with priority. In all cases, the mitigation hierarchy will be followed. This will be assessed during the screening process, following the procedures outlined in the ESMF. The project negative list will exclude any activities that have any impacts on biodiversity. The exclusion list will be strictly followed to screen out activities resulting any adverse impact on biodiversity or change of habitat. The afforestation activities will follow the ESS6 principles and will not allow any invasive species in plantation or will not impact the ecosystem services.
ESS7: Indigenous People	No equivalent requirements on: (i) coverage of IP impacts in the ESIA; (ii) special treatment or differentiated approach to IPs and vulnerable groups; (iii) conduct of FPIC; (iv) development of IP Plan.	SECPF will be prepared in this project.
ESS8: Cultural Heritage	Not currently relevant to the project	Not relevant
ESS10: Stakeholder Engagement and Information Disclosure	The ECA/ECR does not specifically require consultation, but the ESIA guidelines issued by DOE and other agencies recommends public consultations during scoping and the preparation of the ESIA. There is also no provision for any stakeholder engagements during project implementation	A SEP is being prepared for this project.

3.3 Project Risks Category

The project will follow the World Bank Environmental and Social Standards (ESSs), as well as the World Bank Group Environmental, Health and Safety Guidelines. Based on these policies, the environmental and social risk of the project is categorized as “**Substantial**”.

The environmental risk is rated as “Substantial” considering the given project activities, location, and borrower’s existing capacity and commitment. The project WASH activities will include rehabilitation of small scale WASH facilities and construction of solid waste and fecal sludge management facilities. For basic services rural roads, drainage, small bridges and culverts over canal, landing stages for boats will

be rehabilitated; some drainage and slope stabilization infrastructure may be constructed adhering to the existing alignments/footprints of the roads or utilizing public lands only. Cyclone shelters will also be rehabilitated and vertically extended. Infrastructure activity will also include construction of a small scale hybrid power plant from solar and battery energy sources. The project will support afforestation in collaboration with Bangladesh Forest Department (through an MOU with LGED). A number of capacity enhancement activities through TA will be implemented to enhance the capacity of the implementing agencies to provide service, operate and manage climate resilient infrastructure and strategically manage the environment of the project areas in future etc. A TA in collaboration with Department of Environment (through an MOU with LGED) will support comprehensive environmental impact and damage assessment which is expected to take a deep dive into the environmental impacts from the Rohingya influx, including the valuation of ecosystem services to underline the economic benefits of conservation and a strategic environmental assessment for aligning current and future policies, programs, and projects. Potential environment risks are likely to include construction related impacts, OHS, improper management of sludge and generated wastes, inefficient use of resources etc. The project will screen out any activity causing any significant impact on natural habitat and biodiversity. The afforestation will not support introduction of any invasive species and will promote the local species. The prevailing physical environment of both the camps and BC are already modified, there is no critical and natural habitat. Any intervention for host community/DRP intervening natural habitat and topographical change will be screened out. Any project intervention in any areas of environmental and ecological sensitivity and important ecosystem and with high environmental and social risk will be screened out during screening process. An exclusion list of activities and required due diligence is added as an Annex to the ESMF and referred to in the ESCP. All project activities including the TA, solid and fecal waste collection system required for SWM and FSM will and are required to meet the requirement of the 10 Environmental and Social Standards of the ESF. It is expected access to WASH and basic services in the hard to reach areas in Bandarban, camps and BC will bring positive health impact to both the host and DRP communities. Natural slope stabilization (with bamboo and plantation), multi-purpose firefighting innovative solution and multi-purpose disaster shelter were supported in the previous project which will be continued in HELP. These activities are expected to promote nature based solution and disaster preparedness. All the implementing agencies have extensive experience in implementing World Bank projects with satisfactory commitment and performance.

The social risk is rated as “Substantial” due to the risk and impact associated with OHS & CHS due to civil works, risk of SEA/SH, and possibility of exclusion of vulnerable stakeholders (person with disability, female-headed households, women and elderly, ethnic minorities etc.) from consultations and project benefits, due to their economic status, lack of access to information and decision-making abilities.

There will be no land acquisition permitted or required in the host community. The project will only use government land for road rehabilitation (using existing alignments), shelters on public school lands or other government lands. There may be informal settlers occupying public land in host communities who may be displaced and require resettlement assistance according to ESS5. Depending where roads are built, and even when they follow existing alignments, there may be impacts on shops and other private entities. There may also be need for temporary land use for project activities (to keep construction material and set-up labor camps) by the existing rural roads. The extent of such impact will be known upon the confirmation of specific location of subproject and screening of sites and will be managed as per ESS5. The camps in Cox’s Bazar and Bhashanchar are all under government ownership. Inside the camps there may be some insitu movement of refugees due to construction of toilets, WASH facilities, but these occasions are rare, will be avoided as best possible and managed using existing camp relocation protocols and joint verification with UNHCR.

Some interventions in the camps may require the engagement of outside workers given their specialized nature. Labor associated risks include OHS issues, unscrupulous labor practices including discrimination on hiring and assignment, interaction with the local communities & DRP, & potential for GBV/SEA/SH. CHS may be affected by civil work-related waste generation, traffic movement, air and water pollution during construction.

4. Potential Environmental and Social Risk Impacts and Standard Mitigation Measures

This section discusses the guideline to predict the potential and mostly typical impacts on the key environmental and social parameters of the project area based on the assessment of project components and the primary assessment of the activities. The overall impact assessment of the proposed project activities to be implemented reveals that most of the likely adverse impacts could be minimized or eliminated by adopting standard mitigation measures; there is also scope to enhance some of the beneficial impacts to be generated from the proposed project. However, the management of environmental and social impacts will need to be carefully considered.

Table 4.1: Environmental and Social Risks and Mitigation Measures

Project Activities according to WB ESS	Risks and Impacts	Mitigation Measures
ESS1 - Assessment and Management of Environmental and Social Risks and Impacts -Small to medium scale construction work -Construction of shelters - Construction of Solid and Fecal waste management plants - Slope stabilization.	<ul style="list-style-type: none"> ✓ Drainage congestion ✓ Water logging during the construction period ✓ Temporary surface water and ground water pollution, ✓ Construction related dust, air and noise pollution etc ✓ As shelters will be constructed mostly within the existing school premises, community health and safety, particularly of teachers and students near the construction area will be an issue during construction. ✓ GHG emissions ✓ The vulnerable and the disadvantaged people may also be left out of consultation and benefits. ✓ Waste generation 	<ul style="list-style-type: none"> ✓ The project will pay attention to gender-friendly design and separate toilets for girls and female teachers in the shelters and do construction activities outside of school hours. ✓ The construction, repair and rehabilitation of infrastructure conducted under this project will implement energy efficient practices and equipment to reduce GHG emissions associated with the project activities. ✓ The project will support integrated waste management within the existing facilities on government land and without any additional land requirement. ✓ Conduct inclusive and accessible consultations with community members, community leaders and representatives, and local authorities. ✓ Proactively identify, consult with, and reach out to disadvantaged and vulnerable groups and households (through surveys, consultations, or other means, as appropriate). ✓ Usage of solar photovoltaic (PV) pumping systems for the pumping station ✓ For livelihood assistance activities, include specific measures to address the potential obstacles to access for disadvantaged and vulnerable groups. For example, if electronic money transfers are not accessible to certain households, ensure cash transfer. ✓ Ensure that the grievance/beneficiary feedback mechanism is accessible by disadvantaged and

Project Activities according to WB ESS	Risks and Impacts	Mitigation Measures
		vulnerable groups through raising awareness among these groups and in relevant ethnic languages, providing different intake channels, etc.
ESS2 - Labor and Working Conditions -Construction activities -Labor influx	<ul style="list-style-type: none"> ✓ Child labor, ✓ forced labor, ✓ Gender and GBV issues, ✓ Occupational health and safety issues ✓ Possibilities of Labor influx 	<ul style="list-style-type: none"> ✓ Labor influx is expected to be minimal as most of the labor will be recruited locally for HC & from the DRP for the camps. ✓ Non-discrimination provisions to protect vulnerable individuals/groups, procurement procedures to ensure that suppliers are not associated with abuse/exploitation of labor, child or forced labor. ✓ Project will create substantial number of jobs. ✓ The labor site plan and facilities will be a part of the ESMP. ✓ A specific Grievance Redress Mechanism (GRM) has been outlined for the workers to report any issues relating workplace safety and other concerns. ✓ Occupational health and safety will be addressed in the bidding and contract documents as well as ensuring required training and awareness program. ✓ The Contractor will be required to write, adopt and implement a written Labor Influx Management Plan as part of the bidding document and contract before employing any labor in the work. ✓ To ensure the health and safety of workers during the construction will require the contractors to prepare and implement Occupational Health & Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety Guidelines and local legislations. ✓ An Emergency Response Plan will be developed during project implementation for to any accident or emergency while the project will be implemented.
ESS3 - Resource Efficiency and Pollution Prevention and Management -Construction, repair and rehabilitation of infrastructure - Transportation for procurement - Solar activities	<ul style="list-style-type: none"> ✓ Air emissions from exhaust from vehicles and machinery and ✓ fugitive dust generated during construction, ✓ Water pollution from mismanagement of construction ✓ Solid wastes generation ✓ GHG emission ✓ OHS risk 	<ul style="list-style-type: none"> ✓ The air & water pollution can be minimized & mitigated by dust suppression, vehicle maintenance and waste management. ✓ The construction, repair and rehabilitation of infrastructure conducted under this project will implement energy efficient practices and equipment to reduce GHG emissions associated with the project activities. ✓ Integrated waste management plan will be prepared for the project. ✓ Additionally, where possible, the activities will use locally sourced material to reduce GHG emissions associated with transportation for procurement. ✓ Usage of solar system will follow the Bank guidelines of health and safety. ✓ A Separate ESIA (and ESMPs) address potential

Project Activities according to WB ESS	Risks and Impacts	Mitigation Measures
		impacts on resources and pollution management for the health facilities.
ESS4 - Community Health and Safety -Construction activities -Capacity building -Employment activities	<ul style="list-style-type: none"> ✓ Community health & safety risk ✓ Fire Safety risks in the camps, ✓ movement of vehicles and construction materials, ✓ waste generation, & other construction-related risks and impacts. ✓ Traffic issues ✓ Accidents ✓ Disease transmission 	<ul style="list-style-type: none"> ✓ Fire Safety plan will be prepared to develop & implement mitigation measures to prevent & control fires & avoid further incidents & fatalities. ✓ Shelter design will follow the BNBC, that includes universal accessibility. These shelters will be multipurpose, functioning primarily as primary schools & will be constructed in the HC. ✓ Gender-friendly school shelters will be constructed after school hours & include separate toilets for girls and female teachers, with adequate WASH facilities to ensure the health & safety of the students & teachers ✓ A Gender and SEA/SH Action Plan will be developed for the project. ✓ Provision should have been made for contractors to decide of adequate cautions and warning signs for the potential risks in the site. ✓ Any accidents or fatalities on either of the sites should have been responded on an emergency basis and will have to be immediately reported to the Bank team/PIUs. ✓ WBG EHS guidelines need to be followed in the preparation of the ESIA, ESMF and labor related plans. ✓ A public interaction protocol, good practices, good hygiene protocol will be posted in various locations and communities and workers will be made aware of how to contain transmission. ✓ Improper management of wastes and wastewater will also pose health risk to the community people.
ESS 5-Impacts on Land acquisition, Restriction on Land use and involuntary resettlement. Construction activities	<ul style="list-style-type: none"> ✓ Relocate DRP within the camp area. ✓ Involuntary acquisition of private lands. ✓ Physical displacement ✓ Water points and toilets may displace existing homes or facilities DRP's use. ✓ Construction of flood shelters, roads, & piped water networks ✓ Relocation ✓ Construction and rehabilitation of bridges and culvert 	<ul style="list-style-type: none"> ✓ No land acquisition is required for this project ✓ The project will use its previous experience of consulting with UNHCR & conducting joint site visits to relocate DRP within the camp area, keeping social networks intact as far as possible. ✓ The location of sites for flood shelters, roads, & piped water networks, the type & current use of land required for construction, will be identified during the implementation stage. ✓ To use public lands currently in use & designated legally for community use, including existing schools & roads. ✓ The project will screen out involuntary acquisition of private lands & physical displacement of people through a negative list. ✓ Rehabilitation and re-construction and rehabilitation

Project Activities according to WB ESS	Risks and Impacts	Mitigation Measures
	<ul style="list-style-type: none"> ✓ Rehabilitation of existing Jetties in Bhasan Char, Hatiya, which are currently in degraded condition. ✓ Rehabilitation of Road for accessing the jetties. ✓ Construction and rehabilitation of multipurpose disaster shelter. ✓ Minor construction of cold storages and ice mills. ✓ Minor construction of battery storage 	of bridges and culvert
ESS6 -Biodiversity Conservation and Sustainable Management of Living Natural Most project activities will be on existing infrastructure, such as roads and schools	<ul style="list-style-type: none"> ✓ Modify the natural habitat or reserved forest. ✓ Impacts on wildlife habitats or reserved forests or ecologically sensitive areas, depending on the location of this infrastructure. ✓ Impacts on biodiversity. 	<ul style="list-style-type: none"> ✓ The activities will be screened out with priority. ✓ The screening process, following the procedures set out in the ESMF. <p>The project will exclude any subproject that will adversely impact the species and biodiversity features (KBA) and Important Bird Area (IBA) (ref. annex 7)</p>
ESS7 - Indigenous Peoples/Sub Saharan African Historically Underserved Traditional Local Communities	<ul style="list-style-type: none"> ✓ The Project is unlikely to adversely impact these communities 	<ul style="list-style-type: none"> ✓ Screening mechanism will help assess the impacts on the SECs and Small Ethnic Community Development Plan (SECDPs) may be prepared if deemed necessary during implementation. ✓ They will also have full access to the project-level GRM
ESS8 - Cultural Heritage	<ul style="list-style-type: none"> ✓ The project locations are not expected to be in areas of rich cultural heritage 	<ul style="list-style-type: none"> ✓ Chance and Find procedure will be followed as a precaution.

Table 4.2: Summary of Potential Environmental and Social Impacts and their Significance (ESS Risk)

Potential Impacts	Duration of Impact	Spatial Extent	Reversible or not	Likelihood	Magnitude	Sensitivity	Significance Prior to Mitigation	Significance after Mitigation
Impacts related to project preparation								
Land cover and land use changes	Long term	Local	No	Certain	High	Moderate	Substantial negative	Moderate negative
Loss of natural vegetation and trees/mangroves	Long term	Local	Yes	Certain	High	Substantial	Substantial negative	Substantial negative
Loss of aquatic habitat	Long term	Local	No	Likely	Moderate	Substantial	Substantial negative	Negligible negative
Loss of terrestrial habitats	Long term	Local	No	Likely	High	Substantial	Substantial negative	Low negative
Drainage congestion and water logging	Long term	Local but beyond project footprint	Yes	Likely	High	Mild	Moderate negative	Low negative
Loss of agriculture land	Long term	Local	No	Likely	Moderate	Moderate	Moderate negative	Low negative
Impacts on Vulnerable and disadvantage	Long term	Local	No	Likely	Moderate	Substantial	Moderate negative	Low negative
Impacts during project construction phase								
Air pollution	Short term	Local	Yes	Certain	High	Substantial	Substantial negative	Low negative
Noise	Short term	Local	Yes	Likely	High	Substantial	Substantial negative	Negligible negative
Water pollution	Long term	Local but beyond project footprint	No	Certain	High	Substantial	Substantial negative	Substantial negative
Soil contamination	Short term	Local	Yes	Certain	High	Substantial	Moderate negative	Low negative
Solid wastes and hazardous wastes	Short term	Local	Yes	Certain	High	Substantial	Substantial negative	Low negative
Fire and safety	Short term	Local	Yes	Certain	High	Substantial	Substantial negative	Low negative
Impacts on aquatic habitat	Long term	Local but beyond project footprint	No	Certain	Moderate	Substantial	Substantial negative	Low negative
Site clearance and restoration	Short term	Local	Yes	Certain	Moderate	Substantial	Substantial negative	Low negative

Potential Impacts	Duration of Impact	Spatial Extent	Reversible or not	Likelihood	Magnitude	Sensitivity	Significance Prior to Mitigation	Significance after Mitigation
Occupational health and safety	Short term	Local	Yes	Certain	Moderate	Substantial	Substantial negative	Low to moderate negative
Labor Impacts and risks of child labor, forced labor, human trafficking	Short term	Local	Yes	Certain	Moderate	Substantial	Substantial negative	Substantial negative
Involuntary Resettlement	Short term	Local	Yes	Certain	Moderate	Substantial	Substantial negative	Substantial negative
Small Ethnic Communities	Short term	Local	Yes	Certain	Moderate	Substantial	Substantial negative	Substantial negative
Impact on Cultural Heritage	Short term	Local	Yes	Certain	Moderate	Substantial	Substantial negative	Substantial negative
Impacts during post project operational period								
Changes in water courses	Long term	Local	No	Likely	Negligible	Moderate	Low negative	Low negative
Loss of ecological connectivity	Long term	Local	No	Certain	Moderate	Moderate	Moderate negative	Low negative
Impact on terrestrial habitat	Long term	Local	Yes	Likely	Moderate	Moderate	Moderate negative	Low negative
Loss of vegetation	Long term	Local	Yes	Likely	Moderate	Moderate	Moderate negative	Low negative
Generation of solid waste	Long term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	Low negative
Air pollution	Long term	Local	Yes	Likely	Moderate	Mild	Moderate negative	Low negative
Noise generation	Long term	Local	Yes	Likely	Negligible	Mild	Moderate negative	Low negative
Water pollution	Long term	Local	No	Certain	Moderate	Moderate	Moderate negative	Low to moderate negative
Changes in land use pattern	Long term	Local	No	Certain	Moderate	Moderate	Moderate negative	Low negative
Impacts on local livelihoods	Long term	Local	No	Certain	Moderate	Moderate	Moderate negative	Low negative
Increased risk of road accidents	Long term	Local	No	Likely	Negligible	Moderate	Low negative	Low negative

5.Environmental and Social Management Procedures

This project will use a structured approach to environmental and social management to allow the project development process following the newly developed 10 ESSs, follow the mitigation hierarchy of avoidance, minimization, mitigation and compensation/offset for negative impacts and enhancement of positive impacts where practically feasible. Following sections describe what needs to be done at each stage of the overall project life –implementation of the project activities and reporting on progress.

5.1 Sub-project assessment and analysis-Environmental and Social Screening

Environmental and Social screening is essential to gather information on existing baseline status and to assess potential environmental and social impacts of the project activities. Screening identifies the consequence of the proposed project in broader sense based on similar project experiences, stakeholder's perceptions and expert judgment, without having very much detailed investigation. Critical issues are also identified through the screening which needs detailed investigation. Based on the extent of environmental and social impacts obtained from the screening, the decision for further environment and social assessment will be taken.

Screening is usually carried out with the help of simple matrix that includes a set of check list to identify the baseline status and proposed potential impacts of the project intervention. The environmental screening form addresses issues under ESS1, ESS3 and ESS4. The social screening form addresses issues under ESS1, ESS2, ESS4 and ESS10. PIUs must confirm the findings of the screening carried out by the consultants.

As a first step, all proposed activities should be screened to ensure that they are within the boundaries of the Project's eligible activities, and they are not considered as activities listed on the **E&S Exclusion List** is attached with the annex 7.

As a second step, the PIUs will use the **E&S Screening Form in Annex 9** to identify and assess relevant environmental and social risks specific to the activities and identify the appropriate mitigation measures. The *Screening Form* lists the various mitigation measures and plans that may be relevant for the specific activities (such as the Environmental and Social Codes of Practice, the Environmental and Social Management Plan, the Labor Management Procedures, Chance Find Procedures, etc.)

The PIUs will also identify the documentation, permits, and clearances required under the government's Environmental Regulation.

5.2 Environmental and Social Impact Assessment (ESIA)

The purpose of ESIA is to give the environment and people its due importance in the decision-making process by clearly evaluating the environmental and social consequences of the proposed interventions before implementation. Early identification and characterization of critical environmental and social impacts allows the public and the government to review about the environmental viability and social acceptability of a proposed development project and what conditions should apply to mitigate or minimize those risks and impacts. The ESIA will utilize a well-planned and all-inclusive communication and consultation strategy and include a baseline survey covering the prevailing status of income, employment, education, age, skills and other socio-economic aspects along with cultural and community aspects in the areas. Project will undertake a survey for identification of the persons and their families likely to be affected by the project.

Since the project will be implemented in 33 camps in CXB, Bhasan Char island in Noakhali district, and host communities in Cox's Bazar, Bandarban, and Noakhali District areas, activities requiring ESIA may be implemented at different times. Therefore, multiple ESIA's may be necessary, clustering similar activities before the actual intervention begins. In the preparation phase, the ESIA shall achieve the following objectives:

- ✓ To establish the environmental and social baseline in the project area, and to identify any significant environmental and social issues.
- ✓ To assess these impacts and provide for measures to address the adverse impacts by the provision of the requisite avoidance, mitigation and compensation measures.
- ✓ To integrate the environmental and social issues in the project planning and design.
- ✓ To develop appropriate management plans for implementing, monitoring, and reporting of the environmental and social mitigation and enhancement measures suggested.

The impact assessment will be conducted using the 04 major steps as follows:

- ✓ Planning
- ✓ Scoping
- ✓ Environmental and Social Impact Assessment
- ✓ Public Consultation

5.3 Environmental and Social Assessment Process

Specific Activities and Responsibilities in the Environmental and Social Assessment Process:

In Bangladesh, the environmental and social assessment procedure will pass through three major tiers in order to optimize the sources required for conduction of environmental assessment studies, these three tiers are: i) Screening, ii) Initial Environmental Examination (IEE), and iii) Detailed Environmental and Social Impact Assessment (ESIA). Screening decides whether the ESIA process should be applied to a development project and if it is required, its type, IEE or ESIA. The major activities and the relevant responsibilities for each sub-activity are shown in the table below.

Table 5.1: Major activities and responsibilities during different project stages

Project Stage	Steps/ Activities	Description	Responsibility
Step-1: Screening			
Planning and Pre-feasibility	Undertake Screening	Prepare a document containing environmental and social information covering potential environmental and social impacts, mitigation measures, evidence of public consultation etc. Take no further action for projects, which do not require environmental assessment.	DPHE, LGED, RHD and BPDB as proponent or qualified professionals/ Consultants.
Step-2: Scoping to identify types of environmental and social assessment study			
Pre-feasibility/ planning	Scoping Exercise	Identify, by using checklists and based on preliminary field examination the necessity to conduct an IEE or an ESIA.	DPHE, LGED, RHD and BPDB as proponent or qualified professionals/ Consultants.
		Produce environment related document to competent authority for approval.	
Step-3: Terms of Reference (ToR) for environmental and social assessment study			
Pre-feasibility/ planning	Preparation of ToR	Define the main environmental and social concerns and issues related to any infrastructure program, which must be	DPHE,LGED, RHD and BPDB as proponent or

Project Stage	Steps/ Activities	Description	Responsibility
		addressed by environmental and social assessment.	qualified professionals/ Consultants.
	Approval of ToR	Review, comment and approve ToR	DoE, Bangladesh
Step-4: Preparatory work for environmental and social assessment study			
Pre-feasibility and planning	Assigning the work	Determine whether to conduct environment and social assessment using in-house staff or whether to outsource it.	DPHE and LGED as proponent or qualified professionals/ Consultants.
	Environmental and social Assessment team formation	Form team as per approved ToR.	Environmental and social Assessment Team
	Prepare Work Plan	Establish a work plan that gives appropriate weight to all activities.	
Step-5: Undertake environmental and social assessment study			
Step-5.1: Desk Studies			
Planning and design	Secondary data	Collect and review relevant and appropriate published data, such as maps, reports etc.	Environmental and social Assessment Team
	Initiation, interaction and consultation	Discuss the proposed infrastructure and its potential environmental impacts with knowledgeable persons and concerned stakeholders.	
	Preparation of information summary	Draft a summary of the information that is relevant to the project and its possible environmental effects.	
	Methods and Techniques	Determine the methods by which the field work for Environmental and social Assessment will be conducted.	
	Work Plan	Revise the work plan based on desk studies	
Step-5.2: Field Work			
Planning and design	Field equipment	Collect and arrange field equipment required for Environmental and Social Assessment Studies	Environmental and social Assessment Team

Project Stage	Steps/ Activities	Description	Responsibility
	Field survey for collection of baseline information	Survey at project location, interaction with the local community and investigate the issues identified during desk study; collect baseline (physical, biological and socioeconomic aspects) information	
Step-5.3: Data Analysis and Interpretation			
Planning and design	Impacts Identification	Establish what environmental impacts will be taken place as result of interaction of environmental settings and infrastructure construction, rehabilitation, and maintenance activities.	Environmental and social Assessment Team
	Impact Prediction	Establish the extent of environmental consequences of the proposed infrastructure construction and operation.	
	Impact assessment	Judge whether the consequences are significant enough to require action to be taken.	
	Mitigation Measures	Design mitigation measures to avoid, reduce, minimize & compensate for adverse impacts & maximize beneficial impacts.	
	Environmental and social Management Plan	Prepare ESMP covering monitoring and project management to ensure the implementation of mitigation measures.	
	Stakeholder/Public Consultation	Carry out at various stages in the assessment process to ensure quality, comprehensiveness and effectiveness and make sure that stakeholders' views are adequately addressed.	Environmental and social Assessment Team/ LGED, DPHE, RHD, BPDB
Review and Approval	Review & approval of environmental and social assessment report	Check completeness, adequacy, credibility, facilitate the decision-making process; decide if project should proceed or if further alternatives must be examined.	LGED, DPHE, RHD, BPDB will review and forward to DoE for approval of IEE/ESIA report
		Approval of environmental and social assessment report or rejection.	DoE, Bangladesh
Design Implementation	Implementation of ESMP, Monitoring	Determines compliance with ESMP.	LGED, DPHE, RHD, BPDB or appointed professionals
Step-6: Undertake audit			

Project Stage	Steps/ Activities	Description	Responsibility
Environmental and social Audit	Auditing	Environmental and social audit: Annually during Construction and two years after project completion.	LGED, DPHE, RHD, BPDB or appointed professionals

Environmental and social impacts screening process: The ESMF also describes the mitigation approach that should be considered to reduce significant impacts of sub-project activities to acceptable levels and also to enhance benefits where possible. The last sub-section describes the different roles and responsibilities of Contractors in relation to environmental and social issues. The steps in the screening process are provided in the table below.

Table 5.2: Screening Steps, Responsibilities and Timing

Screening Step	Responsibility	Timing
Identification of Sub-Project	Implementing Agency PIUs and E&S Support firm to complete the form.	After identification of potential location(s) for implementing sub-project
E & S screening of sub-projects	Environmental and social support firm and PIUs to conduct environmental and social screening based on site visits and initial consultations with local community/DRPs as well as other agencies working in/near the proposed location(s).	Within 2 weeks of identifying potential locations(s) for implementing sub-project
Preparation of mitigation measures for the sub-project where further detailed environmental and social assessment or ESMP is not required	Environmental and Social Support firm and PIUs to evaluate feasible mitigation measures for the sub-project where further detailed environmental and social assessment or ESMP is not required. World Bank E&S team will review the samples of the proposed mitigation measures.	Within 1 weeks of impact screening
Preparation of specific plans and instruments (ESIA, ESMP, RAP) for the sub-project where further detailed environmental and social studies is required	Environmental and Social Support firm, M&E firm and PIU to decide whether further assessment such as full-fledged ESIA and ESMP and related studies (Vulnerability Assessment for gender and GBV, elderly, children and orphans, persons with disabilities, other identified vulnerabilities); impact assessment or studies on ecological impacts and human-elephant conflict would be required. Specific E&S plans/instruments will be prepared according to the ToRs attached to the ESMF and RPF. World Bank E&S team will review and clear E&S instruments.	Within 1 week of determining mitigation measures and before any bidding documents are issued, contracts signed, or construction activities started
Inclusion of relevant	PIU	Before finalization of

Screening Step	Responsibility	Timing
environmental specifications and ESMPs in the bidding documents		tender/bidding documents
Implementation of mitigation measures and plans	The contractors will carry out the E&S mitigation measures/management plans/instruments according to the screening form/other E&S instruments which will become part of the legal agreement between PIUs and the contractor. World Bank E&S team will review the status of mitigation/ESMPs implementation through supervision.	During construction and operation
Monitoring, Supervision and Reporting	The PIUs with assistance from environmental and social support firm will supervise and monitor the implementation of mitigation measures/management plans/instruments. PIUs will prepare a monthly monitoring report. World Bank E&S team will review monitoring reports.	Regularly during construction and operations

The sub-projects with physical works/interventions require screening. The environmental and social screening will occur during the project preparation stage as a soon as fairly accurate site location(s) is (are) known for the sub-project.

5.4 Environment and Social Management Plan (ESMP)

This section presents the outline environmental and social management plan (ESMP) of the project. The basic objective of the ESMP is to manage adverse impacts of program interventions in a way that minimizes the possible adverse impact on the environment and people of the program influence area. The specific objectives of the ESMP are to:

- ✓ Identify the mitigation measures during preparation of the RAP. ESIA and different plans based on the outcomes of the screening.;
- ✓ Maximize and sustain potential program benefits and control negative impacts.
- ✓ Draw responsibilities for program proponent, contractors, consultants, and other members of the program team for the environmental and social management of the program.
- ✓ Define a monitoring mechanism and identify monitoring parameters to:
 - Ensure the complete implementation of all mitigation measures,
 - Ensure the effectiveness of the mitigation measures,
 - Maintain essential ecological process, preserving biodiversity and where possible restoring degraded natural resources and habitats; and
 - Assess environmental training requirements for different stakeholders at various levels.

The ESMP will be managed through several tasks and activities and site-specific management plans. One purpose of the ESMP is to record the procedure and methodology for management of mitigation measures identified for each negative impacts of the program. The management will clearly delineate the responsibility of various participants and stakeholders involved in planning, implementation, and operation of the program.

Table 5.3: Environmental and Social Management Plan related to Project Activities

Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
Pre-Construction Stage			
Loss of land / and other physical assets	<ul style="list-style-type: none"> No land acquisition is allowed inside the camp or in the host communities. Voluntary land donation is not allowed. For the loss of other physical assets, project will pay adequate compensation on current market price 	PIUs	Social Specialist and Gender and GVB Specialist of PIUs and E&S specialist of M&E firm
Loss of livelihood	<ul style="list-style-type: none"> Preferable employment with contractor for the affected unskilled workers. If non-titled HHs are affected, RAP will be prepared, and mitigation measures will be taken based on entitlement matrix of the RAP. Avoid activities that will have adverse impacts on the host communities. If structures are affected within the camp, contractors/project will replace/reconstruct the affected structures with the cost of project. No cash compensation to the DRP is allowed. Code of conduct required for the Rohingya labors and labors from outside. Awareness generation for nutrition, disaster risk resilience or mitigation, adoption of clean energy for cooking Household training on alternative clean cooking technology Involve Rohingya women with community tree plantation. Alternative livelihood options and training for skill enhancement Engagement of Rohingya labors during construction with credit system payment to buy daily necessary items. Cash payment to the Rohingya labors are not allowed. 	PIUs& Contractor	Social Specialist, communication specialist, and a Gender and GBV Specialist of PIUs, and E&S specialist of M&E firm

Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
	<ul style="list-style-type: none"> Replacement value for the loss of crops, trees and income (for the construction work outside of the camp) 		
Stakeholders Engagement	<ul style="list-style-type: none"> All the project stakeholders will be consulted. Separate community level consultation meeting with the potential affected HHs Consultation meeting with Rohingya male and female about the project objectives and scope of works All the E&S documents will be disclosed to all the relevant stakeholders. Host community and camp people will be involved with the GRM. All the stakeholders will be informed about the GRM 	PIUs& Contractor	Social Specialist and Gender and GBV Specialist of PIUs, and E&S specialist of M&E firm
Loss of Access rights	<ul style="list-style-type: none"> Project to ensure thorough analysis of alternatives that access enjoyed by the community remains intact. In case of unavoidable circumstances, alternative access will be provided. 	PIUs	Social Specialist and Gender and GBV Specialist of PIUs, and E&S specialist of M&E firm
Site Preparation: Soil Erosion; Alteration of natural drainage	<ul style="list-style-type: none"> Construction facilities to be placed 100 meters (where possible) from water bodies, natural flow paths. For tube-well sinking a minimum distance from latrines' soak well to be maintained A minimum distance to be maintained among tube-wells for cone depression and optimizing the production of wells etc. Minimize cut & fill operations, the site clearing and grubbing operations should be limited to specific locations only. Any disruption of socially sensitive areas about human habitation and areas of cultural significance will be avoided. 	PIUs& Contractor	Environmental Specialist of PIUs, and E&S specialist of M&E firm

Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
	<ul style="list-style-type: none"> The existing slope and natural drainage pattern on the site should not be significantly altered. Trees on private lands are felled or damaged during construction operations, compensation shall be paid to the owner as determined by the forest/horticulture departments. The contractor shall ensure that site preparation activities do not lead to disruption of activities of the local residents. 		
Construction Phase			
Noise from construction works	<ul style="list-style-type: none"> Construction activity shall be restricted to daytime as far as possible to avoid disturbance to surrounding areas. Wherever required, personal protective equipment (PPE) such as ear plugs, earmuffs, helmets, etc. should be provided to the persons working in high-risk areas. 	Contractor	Environmental Consultant of PIUs
Dust	<ul style="list-style-type: none"> Construction machinery shall be properly maintained to minimize exhaust emissions of CO, particulate matter (SPM, PM_{2.5, 10}) and Hydrocarbons. Dust generated as a result of clearing, leveling and site grading operations shall be suppressed using water sprinklers. Dust generation due to vehicle movement on haul roads/access roads shall be controlled through regular water sprinkling. 	Contractor	Environmental Consultant of PIUs
Safety Issues	<ul style="list-style-type: none"> Prevent entry of unauthorized personnel and proper storage and control of hazardous materials on site Health and safety training to the Rohingya labors All the camp labors to wear ID cards. Child labors are not allowed for any form of activities. 	Contractor	Environmental Consultant of PIUs

Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
	<ul style="list-style-type: none"> Site(s) shall be secured by fencing and manned at entry points 		
Traffic Management	<ul style="list-style-type: none"> Contractors to provide traffic management plans to be approved by relevant authorities. Adequate alternative arrangements to be made to minimize impact on motorist and pedestrians. Adequate road signs to be planted on access roads to limit vehicular speeds. Construct properly designed speed ramps on access roads. Traffic signs should be both in Bangla and Rohingya language. Transportation of large RWH tanks need to be properly secured 	Contractor	Environmental Consultant of PIUs
Conflicts with existing users due to the scarcity of resource base.	<ul style="list-style-type: none"> A detailed assessment of the available resources and consent of the local representative for withdrawal of water from existing surface water sources shall be taken. If ground water is withdrawn, adequate approvals from the appropriate department need to be undertaken before setting up bore wells. Local community must be consulted before any construction works start. RWH tanks need to be installed in water scarce areas as a priority 	Contractor	Social Specialist and Gender Specialist of PIUs
Increase in road accidents	<ul style="list-style-type: none"> The movement of heavy machinery and equipment shall be restricted to defined routes. Proper signage to be displayed at major junctions. Road diversions and closures to be informed well in advance to the local community. The vehicular movement to be controlled near sensitive locations viz. schools, colleges, hospitals, DRP camps identified along designated vehicular transportation routes. 	Contractor	Environmental Consultant of PIUs

Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
	<ul style="list-style-type: none"> Local community will be trained on traffic management and awareness 		
Labor Base Camp: Conflicts with the residents	<ul style="list-style-type: none"> An alternate arrangement for fuel wood, heating and cooking required to meet fuel requirement of the labor camps . Alternating cooking arrangement for the HHs living in the camp. Awareness building about nutrition, disaster risk resilience or mitigation, adoption of clean energy for cooking; and prevention of child abuse, child marriage, GBV, sexual harassment, trafficking of women and children as well as illegal drug trade. Work force should be prohibited from disturbing the flora, fauna including hunting of animals, wildlife hunting, poaching and tree felling. Adequate facilities ensuring sanitation for labor camps. Treated water will be made available at site for labor drinking purpose. Adequate accommodation arrangements for labor Labor code of conduct to be disclosed through consultation and FGD 	Contractor	Social Specialist and Gender and GBV Specialist of PIUs
Waste Management: Improper management and handling of hazardous and non-hazardous waste during construction.	<p>Preparation of a waste management plan covering the following aspects:</p> <ul style="list-style-type: none"> Residual waste from the temporary accommodation facilities for labor Waste from equipment maintenance/vehicles on-site. The scrap material generated from the erection of structures and related construction activities will be collected and stored separately in a stack yard and sold to local recyclers. Hazardous waste viz. waste oil etc will be collected and stored in the paved and bounded area and subsequently sold to authorized recyclers. Waste from civil works 	Contractor	Environmental Consultant of PIUs

Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
	<ul style="list-style-type: none"> • Applicability of the Hazardous Waste Management Rules 		
Health & Safety Risks: <ul style="list-style-type: none"> • The potential for exposure to safety events such as tripping, working at height activities, fire from hot works, smoking, failure in electrical installation, mobile plant and vehicles, and electrical shocks. • Exposure to health events during construction activities such as manual handling and musculoskeletal disorders, hand-arm vibration, temporary or permanent hearing loss, heat stress, and dermatitis. 	<ul style="list-style-type: none"> • All construction equipment used for the execution of the project works shall be fit for purpose and carry valid inspection certificates and insurance requirements. • The risk assessment shall be prepared and communicated prior to the commencement of work for all types of work activities on site. • Provide walkways that are clearly designated as a walkway; all walkways shall be provided with good conditions underfoot; signposted and with adequate lighting. • Signpost any slippery areas, ensure proper footwear with a good grip is worn for personnel working within slippery areas. • Carry out fire risk assessment for the construction areas, identify sources of fuel and ignition and establish general fire precautions including, means of escape, warning, and fighting fire. • Set up a system to alert workers on site. This may be temporary or permanent mains operated fire alarm. • Fire extinguishers should be located at identified fire points around the site. The extinguishers shall be appropriate to the nature of the potential fire. • Establish and communicate emergency response plan (ERP) with all parties, the ERP to consider such things as specific foreseeable emergency situations, organizational roles and authorities, responsibilities and expertise, emergency response and evacuation procedure, in addition to training for personnel and drills to test the plan. • Electrical equipment must be safe and 	Contractor	Environmental Consultant as well as Social and Gender Specialists of PIUs

Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
	<p>properly maintained; works shall not be carried out on live systems.</p> <ul style="list-style-type: none"> • Only competent authorized persons shall carry out maintenance on electrical equipment, adequate Personal Protective Equipment (PPE) for electrical works must be provided to all personnel involved in the tasks. • An adequate number of staff and first aiders shall be on site in accordance with Bangladesh Labor Law requirements. • First aid kit with adhesive bandages, antibiotic ointment, antiseptic wipes, aspirin, non-latex gloves, scissors, thermometer, etc. shall be made available by the contractor on site. • Emergency evacuation response shall be prepared by the contractor and relevant staff shall be trained through mock-up drills. • Ensure all equipment is suitable for jobs (safety, size, power, efficiency, ergonomics, cost, user acceptability etc.), provide the lowest vibration tools that are suitable and can do the works. • Ensure all tools and other work equipment are serviced and maintained in accordance with maintenance schedules and manufacturer's instructions. • Regular noise exposure assessments and noise level surveys of noisy areas, processes and equipment shall be carried out to form the basis for remedial actions when necessary. • Awareness training sessions should be established and provided to all personnel involved during the construction phase to highlight the heat related illnesses of working in hot conditions such as heat cramps, heat 		

Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
	<p>exhaustion, heat stroke, dehydration.</p> <ul style="list-style-type: none"> • Ensure adequate quantities of drinking water are available at different locations within the site, • Eliminate the risk of exposure whenever possible, provide proper PPE wherever necessary and to ensure that there are satisfactory washing and changing facilities. • Ensure that all workers exposed to a risk are aware of the possible dangers. They should be given thorough training in how to protect themselves and there should be effective supervision to ensure that the correct methods are being used. • Large RWH tanks needs to be properly installed and secured to prevent movement during high wind conditions 		
Operation Phase			
Noise disturbances to fauna	<ul style="list-style-type: none"> • Ensure operation & maintenance machinery and equipment has noise dampeners. • Avoid night time activities as much as possible. • Regular third-party monitoring of noise levels 	PIUs, Private Operator	Environmental Consultant of PIUs
Unintended gaseous emissions from the biogas plant affecting surrounding fauna	<ul style="list-style-type: none"> • Use of HDPE pipes • Ensure fire extinguisher available at site. • Ensure preventative maintenance schedule is followed. • Regular inspections of potential gas emissions points 	PIUs, Private Operator	Environmental Consultant of PIU
Odours and pollution caused by leaking latrines and faecal sludge impacting surrounding water bodies, flora and fauna	<ul style="list-style-type: none"> • Ensure preventative maintenance schedule is followed. • Regular inspections of potential leaking points 	PIUs, Private Operator	Environmental Consultant of PIU

Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
Residue from biogas plant improperly managed and disposed causing land and water pollution	<ul style="list-style-type: none"> Ensure effective Waste Management Plan is developed and implemented. Regular third-party monitoring of receiving land and water bodies 	PIUs, Private Operator	Environmental Consultant of PIU
Draw down of groundwater due to excessive withdrawals	<ul style="list-style-type: none"> Monitoring of extraction rates Coordination with other development agencies Regular third-party monitoring of groundwater levels RWH to be used in water scarce areas as a priority 	PIUs, Private Operator	Environmental Consultant of PIU
Change in water flows due to abstractions by mobile desalination plant	<ul style="list-style-type: none"> Identify suitable water source locations before setting up mobile plant. Monitoring of extraction rates Regular third-party monitoring of groundwater levels 	PIUs, Private Operator	Environmental Consultant of PIU
Pollution caused by discharge of brine water from mobile desalination plant	<ul style="list-style-type: none"> Identify suitable discharge locations before setting up mobile plant. Regular third-party monitoring of groundwater levels 	PIUs, Private Operator	Environmental Consultant of PIU
Improper disposal of solids wastes from solar powered systems can cause land and water pollution	<ul style="list-style-type: none"> Ensure effective Waste Management Plan is developed and implemented. Regular third-party monitoring of receiving land and water bodies 	PIUs, Private Operator	Environmental Consultant of PIU
Decommissioning			
The impacts are similar to those listed in construction stage: <ul style="list-style-type: none"> Pollution from waste materials Health & Safety risks to workers and local community/DRPs 	<ul style="list-style-type: none"> The main mitigation and monitoring measures to minimize or reduce the environmental and social impacts during decommissioning are anticipated to be similar to those identified for the construction phase. Regular third-party monitoring of air as well as receiving land and water bodies 	PIUs / Contractor	Environmental Consultant of PIU

5.4.1 Required site specific environmental and social management plans (ESS 1-10)

Pollution Prevention Plan: will be prepared and implemented by the contractors based on the ECoPs and WBG EHS Guidelines (2007) that will be part of the bidding documents. The Plan will be submitted to the PIUs for their review and approval before contractor mobilization.

Waste Disposal and Effluent Management Plan: will be prepared and implemented by the Contractor based on the ESMP, ECoP, and WBG EHS Guidelines (2007), which will be part of the bidding documents. The Plan will be submitted to the PIUs for their review and approval before contractor mobilization.

Drinking Water Supply and Sanitation Plan: Separate water supply and sanitation provisions will be needed for the temporary facilities including offices, labor camps and workshops in order not to cause shortages and/or contamination of existing drinking water sources. A Plan will be prepared by the contractors on basis of the ESMP and ECoPs, which are part of the bidding documents. The Plan will be submitted to the PIUs for their review and approval before contractor mobilization.

Occupational Health and Safety (OHS) Plan: will be prepared and implemented by each contractor based on the WBG EHS Guidelines (2007), ECoPs, mitigation plan, and other relevant standards. The Plan will be submitted to the PIUs for their review and approval before contractor mobilization.

Traffic Management Plan: will be prepared by each contractor after discussion with LGED, DPHE and RHD authorities responsible for roads and traffic. The Plan will be submitted to the DSM for their review and approval before contractor mobilization. The Plan will identify the routes to be used by the contractors, procedures for the safety of the local community particularly pedestrians, and monitoring mechanism to avoid traffic congestion.

Resettlement Action Plan (RAP): A standalone RPF has been prepared for this project to prepare RAP(if required)

Construction Camp Management Plan: will be prepared by each contractor. The Plan will include the camp layout, details of various facilities including supplies, storage, and disposal. The Plan will be submitted to the PIUs for their review and approval before camp establishment.

Fuel and Hazardous Substances Management Plan: will be prepared by each contractor in accordance with the standard operating procedures, relevant guidelines, and where applicable, material safety data sheets (MSDS). The Plan will include the procedures for handling the oils and chemical spills. The Plan will be submitted to the DSM for their review and approval before contractor mobilization.

Emergency Preparedness Plan: will be prepared by each contractor after assessing potential risks and hazards that could be encountered during construction. The Plan will be submitted to the PIUs for their review and approval before contractor mobilization.

Environmental Management of Resettlement Sitesplan: will be prepared by the Contractor in compliance with the stand-alone ESMP prepared for Resettlement Sites and presented in the main ESIA.

Health, Safety and Environment Plan: will be prepared by PIUs/Contractorto address waste and emergencies associated with workers and community health and safety and to properly manage waste effluents generated from the maintenance works. The Plan will be submitted to the World Bank for review and approval prior to completion of construction.

Stakeholder Engagement Plan (SEP): Onestandalone SEP has been prepared.

Labor Management Plan (LMP): A separate LMP has been prepared for this project.

GAP and SEA/SH Prevention Plan: A separate GAP/SEA/SH Prevention Plan has been prepared for this project.

Communication Strategy: A formal communication strategy will be prepared for the project laying out various communication needs and outreach tools and explaining the responsibility of PIC to convey the

project impacts and its implications for various stakeholders. A key aspect of this strategy shall be the communication of any project related impacts.

Biodiversity conservation and monitoring: Detailed ecological studies will be carried out, during ESIA study in the project impact area, to broaden the existing baseline data. The ESIA of the project should identify potential sites of sensitive ecological area, mangrove area, fish conservation area, locations of dolphin conservation, habitat for coastal birds, sea turtle, etc. in the project area. The proposed study will confirm these locations, identify additional locations and islands/chars of conservation significance, and prepare detailed conservation plans and implement these plans. A consulting firm will be hired to carry out the studies and to conduct biodiversity monitoring during the construction and post-construction periods.

5.5 Guidelines for Bid Documents

Bid documents to be prepared by interested contractors need to incorporate relevant items from the ESMP as well as the monitoring plans. Therefore, during preparation of tender documents, the PIU need to ensure that:

- ✓ All relevant ESMP items relevant for contractors are included in tender documents (specifications and BOQs)
- ✓ Provide clear information to potential bidders regarding environmental, social as well as health and safety considerations for the work package.
- ✓ Submission of supporting documentation/materials of previous experience and track record on ESMP implementation should be mentioned in the instructions to bidders.
- ✓ Evaluation of submitted bids should include criteria for adequacy of ESMP responses and costings.

5.6 Environmental Codes of Practice (ECoPs)

The environmental codes of practice (ECoPs) are generic, non-site-specific guidelines. The ECoPs consist of environmental management guidelines and practices to be followed by the contractors/ implementation organizations for sustainable management of all environmental issues. The contractor will be required to follow ECoPs and also use them to prepare the site-specific management plans.

- ECoP 1: Waste Management
- ECoP 2: Fuels and Hazardous Substances Management
- ECoP 3: Water Resources Management
- ECoP 4: Drainage Management
- ECoP 5: Soil Quality Management
- ECoP 6: Erosion and Sediment Control
- ECoP 7: Topsoil Management
- ECoP 8: Topography and Landscaping
- ECoP 9: Borrow Areas Management
- ECoP 10: Air Quality Management
- ECoP 11: Noise and Vibration Management
- ECoP 12: Protection of Flora
- ECoP 13: Protection of Fauna
- ECoP 14: Protection of Fisheries
- ECoP 15: Road Transport and Road Traffic Management
- ECoP 16: Construction Camp Management
- ECoP 17: Workers Health and Safety.

6. Implementation Arrangements

The GoB will have overall responsibility for project implementation and management through its Ministry of Local Government, Rural Development, and Cooperatives (MoLGRD&C), Ministry of Power, Energy and Mineral Resources (MoPE&MR) and Ministry of Road, Transport and Bridges (MoR&TB). The project will be implemented by four Project Implementation Units (PIUs): LGED, DPHE, RHD and BPDB. All activities will be coordinated by the Refugee, Relief and Repatriation Commissioner (RRRC) at the field level. The rationale for adopting the proposed implementation structure is to be in accordance with the mandate of government agencies, in-line with the rules of business for DRP assistance and coordination, and in order to enable most efficient decision making taking into account internal government fiduciary clearance procedures. Although the project is now at preparation stage, the most likely institutions those would be involved are as follows:

6.1 The Implementing Agencies (IAs) and Project Implementation Units (PIUs)

LGED, DPHE, RHD and BPDB are the project implementation agencies and responsible for managing the E&S risks of the project, including implementation of ESMP, SEP, LMP, SECPF, Gender and SEA/SH Prevention Plan and RPF through its existing structures.

At the project level, considering the multiple implementing agencies, LGED will be responsible for having a coordination role. To streamline monitoring efforts across multiple implementing agencies, LGED will be responsible for reporting the monitoring and evaluation (M&E) of activities from all the implementing agencies. LGED will coordinate with the implementing agencies and prepare monitoring reports as per the project components and will share with the World Bank quarterly.

DPHE will be the implementing agency of Component 1 and parts of Component 3 related to WASH. DPHE PIU will have a dedicated Project Director.

LGED will be the implementing agency for parts of component 2 and parts of Component 3 related to basic services and infrastructure. LGED PIU will have a dedicated Project Director. BFD will sign an MoU with LGED to undertake activities on afforestation. DoE will sign an MoU with LGED to undertake an environmental impact study.

RHD will be the implementing agency for activities that are part of component 2 and associated initiatives in Component 3. RHD PIU will have a dedicated Project Director.

BPDB will be the implementing agency for solar power electrification of Bhasan Char under component 2 and associated initiatives in Component 3. BPDB PIU will have a dedicated Project Director.

For all implementing agencies, key staffing includes Procurement Specialist, Financial Management Specialist, Environmental Specialist, Social Specialist, Gender Specialist/GBV Specialist, M&E Specialist, and Communications Specialist(if applicable). The PIUs may be strengthened with additional staff as required and as agreed with the Bank. In addition, given LGED's coordination role, LGED will hire an M&E firm to perform M&E of all project activities.

To ensure the proper management of E&S aspects under the Project, field level officers will be responsible for liaising with the UN agencies and other entities which may be sub-contracted, and ensuring that the Bank's policies are adhered to, similar arrangements will have to be established at every layer of contracting.

Project Steering Committee (PSC): Following the Government's Rules of Business, the PIUs will report to their respective Ministerial Project Steering Committee (PSC), chaired by the respective Sr. Secretary/Secretary. LGED and DPHE will be chaired by one PSC under MoLGRD&C. The PSC for RHD will be chaired under MoRT&B. The PSC for BPDP will be chaired under MoPE&MR. The PSCs will include representatives from ministries, division, departments/agencies that are part of overall implementation, coordination, and strategy. The PSC will be responsible for: (i) providing implementation advice and operational guidance; (ii) reviewing financial and physical progress; (iii) resolving implementation problems; and (iv) providing any other necessary direction for effective implementation. The PSC will meet at least every six months.

Project Implementation Committee (PIC): Each project implementation agency will have a Project Implementation Committee (PIC), chaired by the head of agency (Chief Engineer LGED and Chief Engineer DPHE), which will assist in the supervision of the respective components. The PIC is expected to include relevant representatives from ministries, division, departments/agencies. The PIC will ensure that implementation follows both Government and Bank rules and regulations. Specifically, the PIC will be responsible for: (i) supervising and reviewing implementation and providing necessary advice for timely delivery; (ii) monitoring and evaluating implementation progress and suggesting necessary course corrections; (iii) resolving issues and conflicts that may emerge during implementation; (iv) facilitation coordination and convergence with other line ministries, division, and departments/agencies; and (v) keeping the PSC apprised on overall performance and key issues relating to the project.

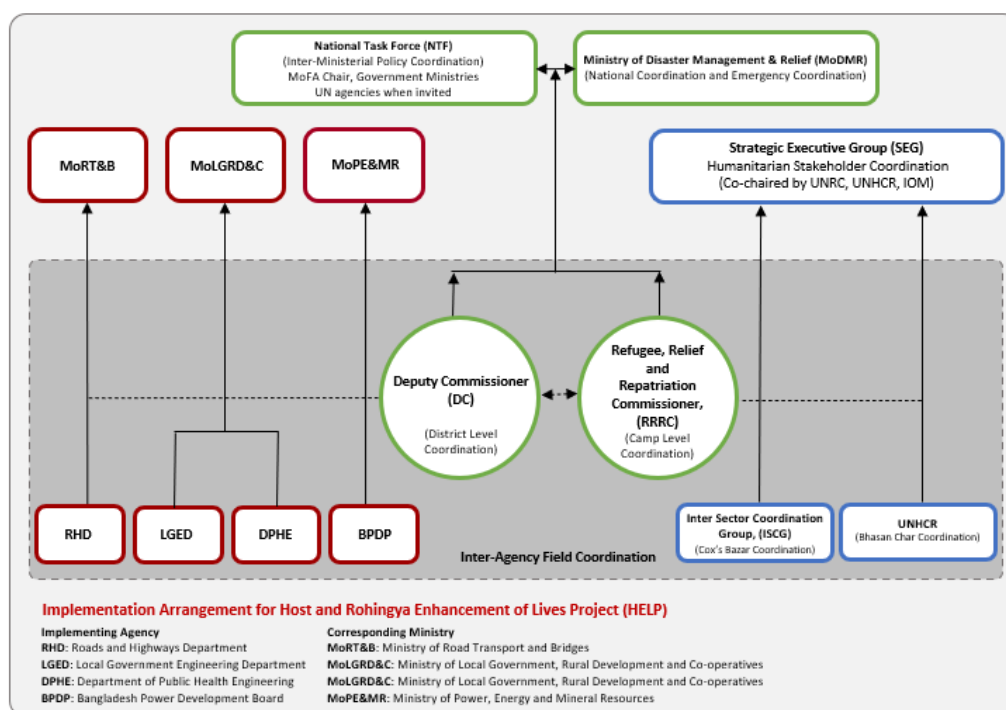


Figure 6.1: Implementation Arrangement for HELP

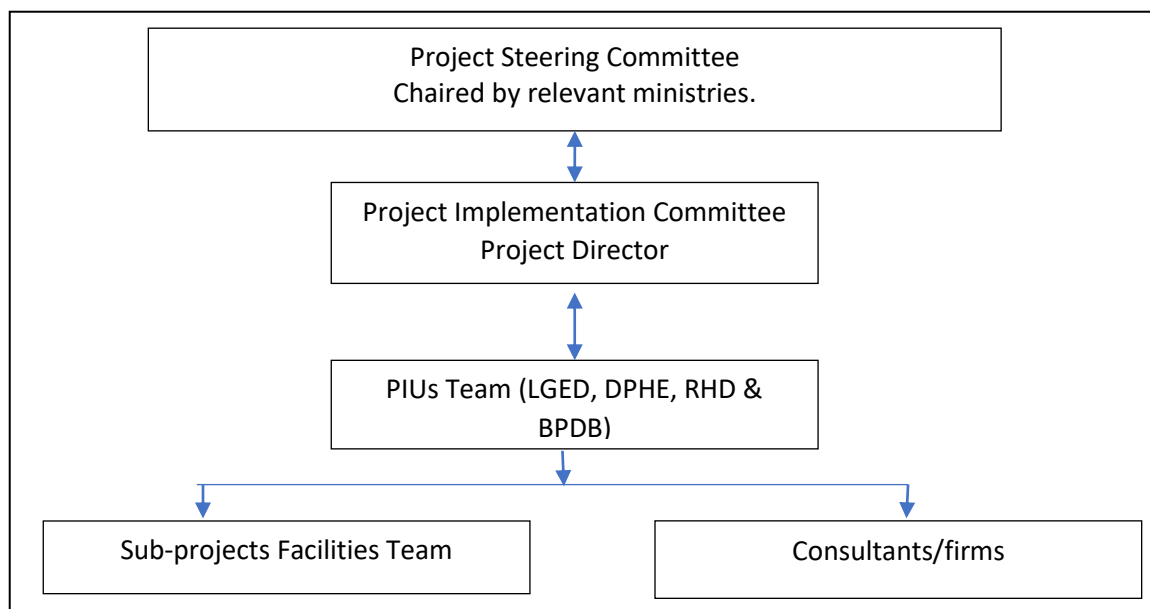
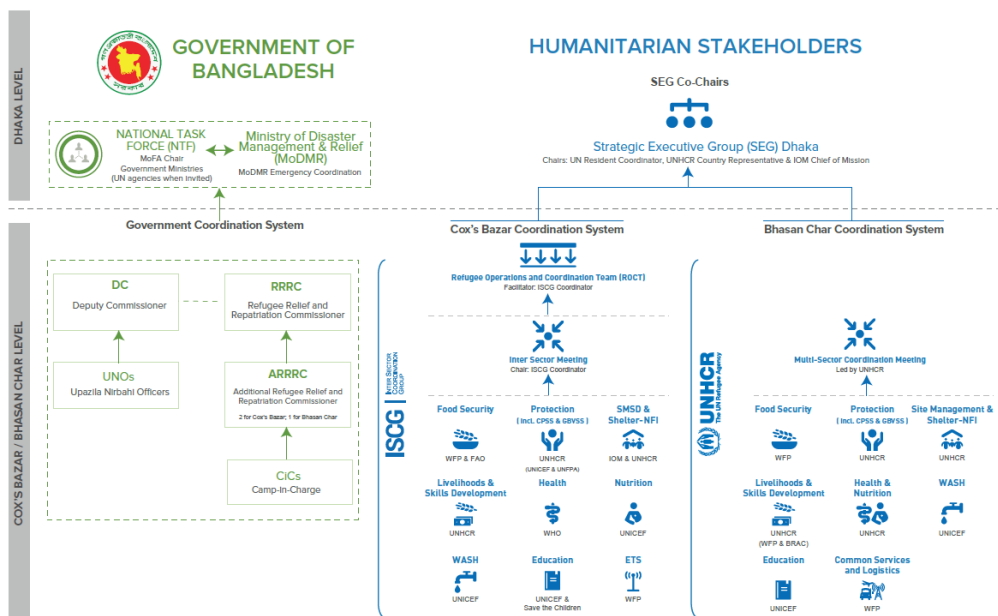


Figure 6.2. Overall Institutional Arrangements

The Project will use existing arrangements of the GoB for all implementation coordinated through the existing government mechanism (Figure 6.2). The existing Development Partner/Multi-Lateral/Bi-Lateral/UN Agencies coordination mechanism in the field will be through the Inter Sector Coordination Group (ISCG) and coordinated in Dhaka by the Strategic Executive Group (SEG). There will be inter-agency field level coordination on project activities with the RRRC, the ISCG, and the implementing agencies.



Source: 2023 Joint Response Plan Rohingya Humanitarian Crisis.

Figure 6.3: Inter agency coordination arrangements.

The Refugee Cell and its field level team represented by Camp-in-Charges/Refugee, Relief and Repatriation Commissioner (RRRC) will also be supported by qualified service provider(s), including specialized agencies, to coordinate and administer day-to-day activities. This will comprise compliance and sub-project monitoring, and training and administrative systems development and management.

To ensure the proper management of environmental and social aspects under the Project, field level officers will be responsible for liaising with the UN agencies and other entities which may be sub-contracted, and ensuring that the Bank's policies are adhered to, similar arrangements will have to be established at every layer of contracting. The PIUs may be strengthened with additional staff as required and as agreed with the Bank. IAs will prepare separate monitoring reports and will share with World Bank quarterly.

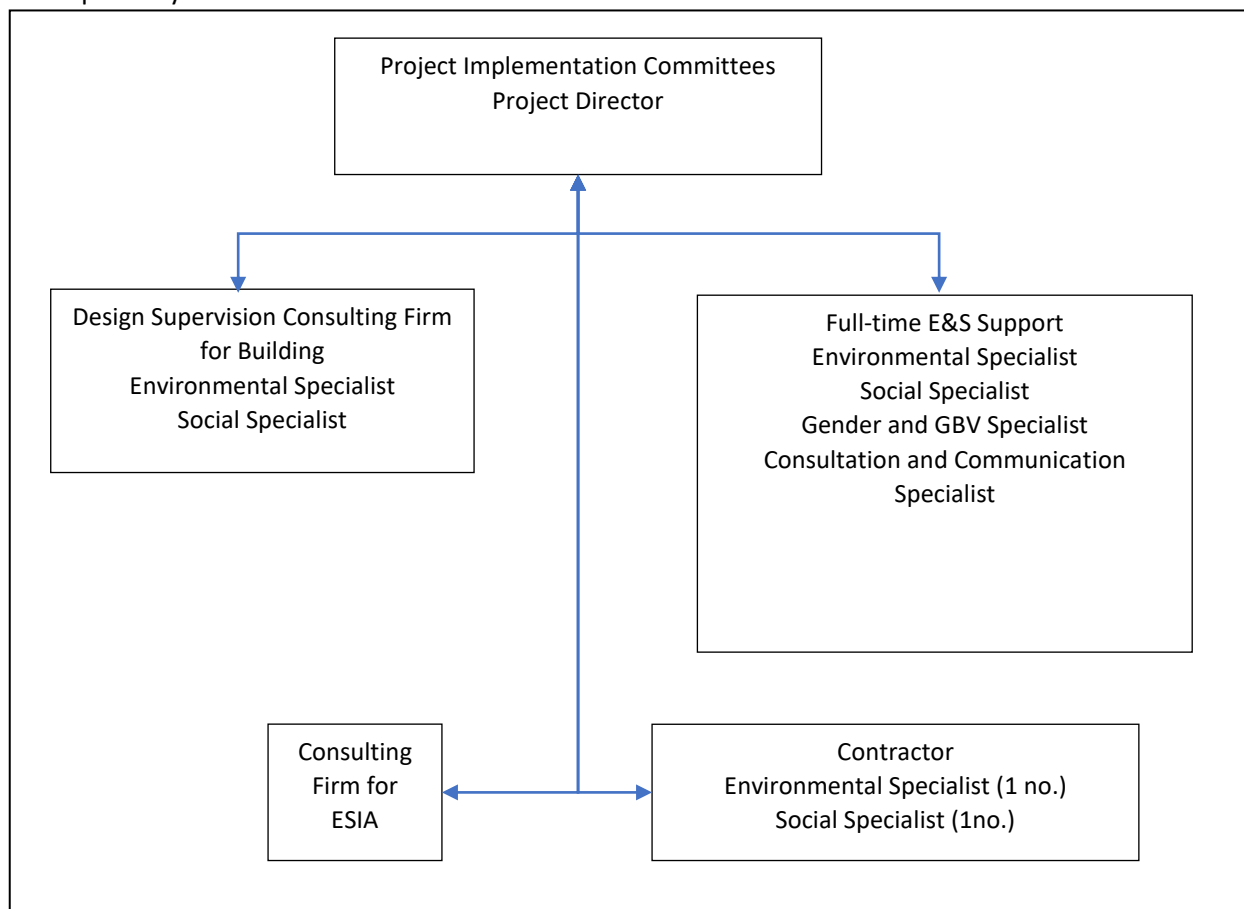


Figure 6.4: PIUs Institutional Arrangements

Roles and responsibility of Contractors: Contractors will need to follow the LMP, which has been prepared as a stand-alone document, to cover all requirements of ESS2. The LMP includes the assessment of risks and impacts and required mitigation measure to ensure health and safety of the contractor's workers that may be exposed to health risks. The LMP directs contractors to localize the economic benefits with minimal opportunities for outside labor to service work that require specialized/skilled labor that is not present in project localities. Beside this the Contractor will be required to write, adopt and implement a written Labor Influx Management Plan as part of the bidding

document and contract before employing any labor in the work. Although Labor influx is expected to be minimal as most labor will be recruited locally for HC & from the DRP for the camps.

Contractors need to address issues such as child labor, forced labor, gender and GBV issues, occupational health and safety specified in the bidding and contract documents as well as ensuring required training and awareness program. Adequate OHS protections in accordance with EHSGs and GIIP will also be required to be implemented by contractors. To ensure the health and safety of workers during the construction contractors will be required to prepare and implement Occupational Health and Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety Guidelines and local legislations. Contractors will also need to prepare and implement site specific Environmental and Social Management Plans (ESMPs). A specific Grievance Redress Mechanism (GRM) for the workers need to be implemented by the contractors.

6.2 Specialist Responsibility

Environmental Specialist: PIUs will have a dedicated Environmental Specialist to ensure implementation of ESIA, site based ESMPs and ESMF and other environmental responsibilities, including occupational health and safety issues. (S)He will maintain liaison with IAs and others during the Project implementation. (S)He will organize training activities for stakeholders. (S)He will also monitor project activities to ensure that environmental mitigation measures are properly implemented (especially environmental risks management issues). (S)He will prepare monitoring reports as directed by the Project Director.

Social Specialist: The PIUs will have a dedicated Social Specialists to ensure implementation of ESMP and other social management responsibilities. They will maintain liaison with WB E&S team, regulatory agencies, and other stakeholders during the Project implementation. The Specialists will also monitor construction activities to ensure that social mitigation measures are properly implemented.

Gender and GBV Specialist: The PIUs will have a dedicated Gender Specialist to ensure implementation gender responsibilities. They will maintain liaison with WB E&S team, regulatory agencies, and other stakeholders during the Project implementation. The Specialist will also monitor gender aspects associated with construction activities are properly implemented.

Consultation and Communication Specialist: A consultation and communication specialist will be hired at PIUs to implement SEP.

Labor and OHS Specialist: A labor and OHS specialist will be hired by the firms of DPHE, LGED, BPDB and RHD to ensure implementation of Labor Management Plans prepared by the contractors following the guidelines of LMP.

Contractor's Environment Supervisor. The construction contractors should assign a dedicated, properly qualified and experienced, site-based Environment Supervisor (ES) at the construction site. The ES will be responsible to implement various aspects of the ESMP particularly the mitigation measures to ensure that the environmental and social impacts as well as the health and safety issues of the construction works remain within acceptable limits. The ES will also be responsible to conduct environmental

training for the construction crew. The ES needs to be a graduate preferably in environmental science/engineering with at least 3 years' experience in environmental management and health and safety.

Contractor's social Officer: The contractor shall have a Social Officer on the site who will be responsible to implement all social issues, gender and labor issues with the guidelines of PIU/Social firms E&S team. PIUs with support of social specialist and social firm will make sure that all contractors workers and counterpart who are involved in project implementation receive both initial and ongoing social and gender awareness and training sufficient to ensure they are familiar with their social responsibilities under the ESMP.

Environmental and Social Support Firms: These firms shall support the PIU (and their consultants) by independently supervising environmental and social related activities in the field. Firm will provide all necessary training to the contractors.

Supervision Consultant: This consultant shall ensure that design of all physical works consider of environmental and social considerations.

Monitoring and Evaluation Consultant: This consultant shall carry out independent monitoring and evaluation of monitoring items identified in Section 9.4. In particular, the consultant shall evaluate the training records, GRM register and ESMP monitoring documents.

Department of Environment (DoE): Where relevant, DoE is responsible for issuing Site Clearance and Environmental Clearance Certificates (ECC).

6.3 Capacity Building

Environmental and social training will help ensure that the requirements of the ESS and subsequent social issues are clearly understood and followed by all project personnel throughout the project period. The PIUs will ensure, in collaboration with the PSC that these training are provided to all Project personnel. The social and environmental training program will be finalized before the commencement of the project. The training will be provided to the relevant ministry's representatives, staffs, contractors, NGOs and other staffs engaged in the Project. Training will cover all staff levels, ranging from the management and supervisory to the skilled and unskilled categories. The scope of the training will cover general environmental and social awareness, key environmental and social impacts of the program, ESMP requirement, OHS aspects and GBV. Different training programs will be initiated which can be realigned based on the needs. A tentative training programs for the project is shown in Table below.

Table 6.1 . Proposed Training and Capacity Building Approach

Contents	Participants	Responsibility	Schedule
Introduction to World Bank ESF	PIUs implementing agency and contractors	World Bank and line	Prior to the start of the Project activities.

Contents	Participants	Responsibility	Schedule
		ministries	
ESF guidelines and ESMF	PIUs implementing agency and contractors/ NGOs	line ministries with the support of WB team	Prior to the start of the Project activities.
Screening method, social survey procedures, ESMP preparation	representative of line ministries representatives; PIUs, Consulting firm/NGO	PIUs E&S specialist	Prior to the start of the Project activities.
Training on ESS2, ESS10 and ESS5 (labor and working conditions, resettlement; stakeholder engagement etc.)	PIUs. Selected contractors' crew	PIUs	Prior to the start of the field activities.
Preparation and review of ESMF, SEP, LMP, RPF	PIUs. Design, Monitoring and supervision consultant	PIUs	Prior to the start of the field activities.
Grievance Mechanism and handling procedures	Contractors, PIUs, consulting firms/NGO, Contractor	PIUs	Prior to the start of the construction activities. (To be repeated as needed)
Internal and External Monitoring procedures and reporting	PIUs and INGO/consulting firms, contractors	PIUs	Before and during the construction activities. (To be repeated as needed)
Occupational Health & Safety: ESMP implementation; GBV/SEA/SHA; Workplace risk management; Prevention of accidents at work sites; Health and safety rules; Solid and liquid waste management; Traffic and Road Safety; Preparedness and response to emergency situations	Officials of IAs, locally active NGOs, Civil Work Contractors, Workers	PIUs	Prior to mobilization of project staff and workers/ contractors
GBV Risk Module Raising awareness and measures to prevent and mitigate GBV/SEAH risks. The topics and activities will be developed and included in the Project GRM.	IA Local officials, Contractors Health Safety Officer, Labor Sardars (Leaders), Local NGOs, OCC Staffs	PIUs	Within six months of Project effectiveness and thereafter yearly

Contents	Participants	Responsibility	Schedule
Waste Sub-projects management crew will be trained for operation and maintenance, with a special focus on safe disposal of wastewater, hazardous wastes (e.g. solid wastes, liquid wastes) including necessary training and awareness on sanitation technology and management.	Waste Management Team of the HCFs' staff	PIUs	Upon assignment of waste management crew/ firm/

6.4 Guidelines for Bid Documents

Bid documents for ESMF related documents will be prepared by interested firms need to incorporate relevant items from the ESMF and ESMPs. All the ESMF related documents will be inserted with the bid documents and external monitor. Therefore, during preparation of tender documents, the PIUs need to ensure that:

- ✓ All relevant E&S documents including RPF, LMP, SEP, ESMF and ESMP items relevant for contractors and firms are included in tender documents (specifications and BOQs)
- ✓ Provide clear information to potential bidders regarding social considerations for the work package(s)
- ✓ Submission of supporting documentation/materials of previous experience and track record on social requirements and implementation should be mentioned in the instructions to bidders.
- ✓ Evaluation of submitted bids should include criteria for adequacy of social documents preparation and implementation responses and costing.

6.5 Budget for ESMF implementation

A budget for implementation of this ESMF is proposed below. This may be changed/updated once the ESMF has been prepared.

Table 6.2: Tentative ESMF Implementation budget

Items	Man-month	Total (in USD)
Social Development Specialist	36	90,000
Environmental Specialist	36	90,000
communication specialist	24	60,000
Gender and GBV specialist	24	60,000
Consultation and Communication Specialist	60	180,000
Consulting firm for ESIA/ESMP and RAP etc. preparation and implementation	Lump-sum	160,000
External Monitor	24	100,000
Capacity Building for PIU, NGO/consulting firm, Contractors	Lump-sum	100,000
Grievance handling cost	Lump-sum	40,000
Total		890,000

6.6 Monitoring

PIUs will conduct regular monitoring and evaluation of the updating and implementation of the ESMF. Monitoring and evaluation are intended to help ensure that the resettlement action plan is prepared and implemented according to the resettlement policy framework. The objective of the monitoring framework is to ensure that the mitigation measures designed to prevent, reduce and where possible offset any significant adverse on environmental and social impacts throughout the Project lifecycle.

Moreover, external monitor of the project will review all the E&S documents prepared for this project. External monitor will establish dialogue with the affected communities and ensure that their concerns and suggestions are incorporated and implemented in the project. External monitor will work closely with the PIUs and internal monitoring team to implement the ESMP and other plans. He or she will prepare training programs and workshops for the staff of the PIUs and contractors.

In addition to internal monitoring, external (or independent) monitor will be engaged to provide an independent periodic assessment of ESIA and other plans implementation and impacts, to verify internal reporting and monitoring, and to suggest adjustment of delivery mechanisms and procedures as required. To function effectively, the organization responsible for external monitoring should be independent of the governmental agencies involved in resettlement implementation. Regular external monitoring should begin along with implementation activities and continue until the end of the project. The following activities are the standard functions of the external monitors:

Verification of internal reports, by field check

- Interview a random sample of PAPs in open-ended discussions to assess their knowledge and concerns.
- Participate as an observer in public consultations for PAPs at the project level. (Organizing these meetings is the responsibility of the implementing agency)
- To assess effectiveness and compliance with the ESMF.
- Check the type of grievance issues and the functioning of grievance redress mechanisms by reviewing processing of appeals at all levels and interviewing aggrieved PAPs.
- Advise project management unit regarding possible improvements in the implementation of the ESMF.

PIUs will establish procedures to monitor and evaluate the implementation of the plan and will take corrective action as necessary during implementation to achieve the objectives of the ESS. The extent of monitoring activities will be proportionate to the project's risks and impacts. For this project PIUs will ensure competent professionals to monitor the implementation of ESMF, design corrective actions as necessary, and NGO/consulting firms on compliance with ESS and periodic monitoring reports will be prepared and affected persons will be informed about monitoring results in a timely manner.

Table 6.3 . Monitoring process of key indicators

Monitoring Aspects & Relevant ESS	Potential Indicators
Consultation ESS1, ESS5, ESS10	<ul style="list-style-type: none"> • Strategy for consultation and information disclosure is prepared. • Consultations organized as scheduled. • Project information's are disclosed.

Monitoring Aspects & Relevant ESS	Potential Indicators
	<ul style="list-style-type: none"> Affected, interested, disadvantage and vulnerable groups are identified. Views of disadvantage and vulnerable groups are considered during designing the entitlement and special measures are taken. Schedules are planned for the various stakeholder engagement activities. Knowledge of entitlements by the relevant stakeholders including project affected people
Grievances ESS2, ESS4, ESS5,ESS10	<ul style="list-style-type: none"> Operationalization of the grievance redress mechanism proposed with ESMF. Operationalization of the GRM for labor and GBV Information on the resolution of the grievances Process by which people affected by the project can voice their grievances and concerns. Process to document complaints and concerns Grievance recording (e.g. MIS, grievance log book) Stipulated timeframes for acknowledgement and resolution of complaints Awareness raising, to inform stakeholders about the GRM and appeals process. Grievance reports published and frequency
Communications and Participation ESS10	<ul style="list-style-type: none"> Number of general meetings (for both men and women). Percentage of women out of total participants. Number of meetings exclusively with women. Number of meetings exclusively with vulnerable groups. Number of meetings at new sites. Number of meetings between hosts communities and the DRPs. Level of participation in meetings (of women, men, and vulnerable groups). Level of information communicated—adequate or inadequate. Information disclosure. Translation of information disclosure in the local languages.
Budget and Time Frame ESS1, ESS5	<ul style="list-style-type: none"> Social Specialist/expert appointed and mobilized on schedule for the field and office work. Capacity building and training activities completed on schedule. Achieving resettlement implementation activities against the agreed implementation plan. Funds allocation for resettlement to implementing agencies on time. Receipt of scheduled funds by resettlement offices. Funds disbursement according to the resettlement action plan. Social preparation phase as per schedule.
Contractors and sub-contractors ESS2	<ul style="list-style-type: none"> Setting a special score board approach based on the activities accomplished during project interval. Project parties and laborers as well based on the set criteria.
Implementation of mitigation measures ESS1, ESS2, ESS3, ESS5,	<ul style="list-style-type: none"> Environmental and social monitoring parameters as per approved ESMPs based on subproject screenings and/or ESIA's

Monitoring Aspects & Relevant ESS	Potential Indicators
ESS4, and ESS10	

ESMF monitoring will be carried out to ensure that the mitigation measures and plans are regularly and effectively implemented (Table 6.4). The PIUs environment and social specialists will carry out ESMF monitoring to ensure that the mitigation plans are being effectively implemented and will conduct field visits on a regular basis.

Table 6.4: ESMF Monitoring Plan

What	When	Who	How
Preparation phase			
Training and Capacity Building Activities	Before preparation of tender documents	PD with Environmental and Social Support Firms	Review Training Records
Ensure Screening of Environmental and Social Issues	After locations and alignments are confirmed by PD	PIUs with Environment and Social Firms	Review completed Screening Sheets
Construction phase			
Training and Capacity Building Activities	Monthly	PD with Environment and Social Firms	Review Training Records
Grievances Records	Monthly	PD with Environment and Social Firms	Review GRM register
Environmental and social mitigation/ enhancement measures (including health and safety measures) outlined in the ESMP and incorporated in the tender bidding documents and the approved contracts.	Monthly	PD with Environment and Social Firms	Review ESMP monitoring documents
Operation and maintenance phase			
Grievances Records	Monthly	PIUs	Review GRM register
Environmental and social mitigation/ enhancement measures (including health and safety measures) outlined in the ESMP	Monthly	PIUs	Review ESMP monitoring documents

6.7 Reporting

The PIUs will prepare a monthly report will summarize the following:

- ✓ Progress in implementing this ESMP and subsequent other E&S documents, etc.;
- ✓ Findings of the monitoring programs, with emphasis on any breaches of the control standards, action levels or standards of general site management.
- ✓ Summary of any complaints by external bodies and actions taken / to be taken; and
- ✓ Relevant changes or possible changes in legislation, regulations and international practices.

Table 6.5. Reporting Requirements

Report/Document	Description	Prepared By	Submitted To	When
Training Records	Register of all Trainings and Capacity Building activities conducted under the project	PIUs; Consultants	PD	Within 3 weeks of any training/capacity building activity
Completed E&S Screening Forms	Identifies Potential Environmental and Social Issues	PIUs; Consultants	PD	After completing forms
GRM Records	Register of grievances received and actions taken	GRC or Consultants during construction phase and then relevant Implementing Agency officer thereafter	PD	Monthly
Internal Monitoring	Monitoring data as defined in the ESMF	PIUs and/or Consultants	PD	Monthly
External Monitor	Monitoring data as defined in the ESMF	External monitor	World Bank	Every quarter

7. Stakeholder Engagement, Disclosure, and Consultations

7.1 Stakeholder Engagement, disclosure, and consultation

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement.

This ESMF, as well as the SEP and the Environmental and Social Commitment Plan (ESCP) that have been prepared for this project, have been disclosed in draft form stakeholder consultations on the following website [provide website address] on [date].

7.2 World Bank Grievance Redress System (GRS)

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complaints directly to the Bank through the Bank's Grievance Redress Service (GRS) (<http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>). A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA

Annex 1: Sample ToR for Environmental Specialist

Project Description

The project is designed to provide support to Displaced Rohingya People (DRP) the host communities in fulfilling basic needs and improving livelihoods. In the Cox's Bazar camps and the surrounding host communities, significant fraction of population does not have adequate access basic WASH facilities. 46 percent of host community households and 17 percent of DRP households use unimproved sanitation facilities.⁵ Even though DRP households have relatively better access to sanitation facilities than host communities, capacity of these facilities remains constrained as compared to the service demands. For instance, most of the community facilities are shared by more than 20 families for drinking water which leads to access, safety and gender violence related issues.

To reduce the strain on livelihoods and basic service delivery in Cox's Bazar, the GoB has facilitated the voluntary relocation of around 30,000 DRP to Bhasan Char since 2021. Bhasan Char, an island located in the Bay of Bengal in the Noakhali District, emerged in 2006 as an island formed of Himalayan silt and sediments. The GoB has invested around US\$400 million to make the island livable. Notable infrastructure developments include an 11km embankment to protect 1700 hectares of land; 1440 housing facilities; 120 cyclone shelters; one government hospital; 29 schools; and WASH facilities supported by about 1.8MWp centralized and standalone solar PV based power systems.⁶ Among many, key needs in Bhasan Char include improvement and maintenance of existing infrastructure; accessibility to neighboring lands; and health, livelihoods and education.

Major Responsibilities:

Reporting to the Project Director and among others, perform the following roles and responsibilities.

- ✓ Lead the environmental and occupational health and safety related activities of the project.
- ✓ Develop, organize and deliver trainings and orientation of environmental pertinent to the project with the stakeholders which will include, but not limited to; line ministry/Project staff, Partner Organizations, and relevant stakeholders.
- ✓ Carry out environmental screening and assessment of relevant sub-projects to identify the potential impacts (especially waste management related issues) in the project areas.
- ✓ Based on the data/information of the above screening/assessment, prepare site specific ESMPs for the project.
- ✓ Carry out regular field visits to assess the quality and adequacy of screening and also supervision of environmental related activities.
- ✓ Prepare and submit regular environmental monitoring and implementation progress reports.
- ✓ Any other responsibility/activity asked by the project management.

Qualifications:

The Specialist will possess the following qualifications.

- ✓ Minimum 10 years' prior experience in the areas of environmental with any reputed national/international organizations
- ✓ Previous experience of working in the multi sector related development project will be considered an advantage

⁵ World Bank. September 2023, 'Living Conditions Brief, Cox's Bazar Panel Survey Round 2 (2023)'.

⁶ Bangladesh Navy. September 2023.

- ✓ Demonstrated capacity in delivering training/orientation and report writing both in English and Bengali
- ✓ Master's degree in any subject of environmental science
- ✓ Previous experience on environmental with World Bank/Bank/another donor funded project is highly desirable.

Annex 2: Sample ToR for Social Specialist

Project Description

The project is designed to provide support to Displaced Rohingya People (DRP) the host communities in fulfilling basic needs and improving livelihoods. In the Cox's Bazar camps and the surrounding host communities, significant fraction of population does not have adequate access basic WASH facilities. 46 percent of host community households and 17 percent of DRP households use unimproved sanitation facilities.⁷ Even though DRP households have relatively better access to sanitation facilities than host communities, capacity of these facilities remains constrained as compared to the service demands. For instance, most of the community facilities are shared by more than 20 families for drinking water which leads to access, safety and gender violence related issues.

To reduce the strain on livelihoods and basic service delivery in Cox's Bazar, the GoB has facilitated the voluntary relocation of around 30,000 DRP to Bhasan Char since 2021. Bhasan Char, an island located in the Bay of Bengal in the Noakhali District, emerged in 2006 as an island formed of Himalayan silt and sediments. The GoB has invested around US\$400 million to make the island livable. Notable infrastructure developments include an 11km embankment to protect 1700 hectares of land; 1440 housing facilities; 120 cyclone shelters; one government hospital; 29 schools; and WASH facilities supported by about 1.8MWp centralized and standalone solar PV based power systems.⁸ Among many, key needs in Bhasan Char include improvement and maintenance of existing infrastructure; accessibility to neighboring lands; and health, livelihoods and education.

Major Responsibilities:

Reporting to the Project Director the Social Specialist will assume, among others, the following roles and responsibilities.

- ✓ Lead the social related activities of the project.
- ✓ Develop, organize and deliver trainings and orientation of social pertinent to the project with the stakeholders which will include, but not limited to; line ministry, Project staff, Partner Organizations, and relevant stakeholders.
- ✓ Carry out social screening and assessment of relevant sub-projects to identify the presence of project stakeholders in the project areas.
- ✓ Based on the data/information of the above screening/assessment, prepare site specific RPF for the project.
- ✓ Carry out regular field visit to assess the quality and adequacy of screening and also supervision of social related activities.
- ✓ Prepare and submit regular social monitoring and implementation progress reports.
- ✓ Any other responsibility/activity asked by the project management.

Qualifications:

The Social Specialist will possess the following qualifications.

- ✓ Minimum 8-10 years prior experience in the areas of social with any reputed national/international organizations
- ✓ Previous experience of working in the health relevant project will be considered an advantage.

⁷ World Bank. September 2023, 'Living Conditions Brief, Cox's Bazar Panel Survey Round 2 (2023)'.

⁸ Bangladesh Navy. September 2023.

- ✓ Demonstrated capacity in delivering training/orientation and report writing both in English and Bengali
- ✓ Master's degree in any subject of social science
- ✓ Previous experience on social with World Bank/Bank/another donor funded project is highly desirable.

Annex 3: Sample ToR for Communication Specialist

Project Description

The project is designed to provide support to Displaced Rohingya People (DRP) the host communities in fulfilling basic needs and improving livelihoods. In the Cox's Bazar camps and the surrounding host communities, significant fraction of population does not have adequate access basic WASH facilities. 46 percent of host community households and 17 percent of DRP households use unimproved sanitation facilities.⁹ Even though DRP households have relatively better access to sanitation facilities than host communities, capacity of these facilities remains constrained as compared to the service demands. For instance, most of the community facilities are shared by more than 20 families for drinking water which leads to access, safety and gender violence related issues.

To reduce the strain on livelihoods and basic service delivery in Cox's Bazar, the GoB has facilitated the voluntary relocation of around 30,000 DRP to Bhasan Char since 2021. Bhasan Char, an island located in the Bay of Bengal in the Noakhali District, emerged in 2006 as an island formed of Himalayan silt and sediments. The GoB has invested around US\$400 million to make the island livable. Notable infrastructure developments include an 11km embankment to protect 1700 hectares of land; 1440 housing facilities; 120 cyclone shelters; one government hospital; 29 schools; and WASH facilities supported by about 1.8MWp centralized and standalone solar PV based power systems.¹⁰ Among many, key needs in Bhasan Char include improvement and maintenance of existing infrastructure; accessibility to neighboring lands; and health, livelihoods and education.

Scope of Work

The scope of these TORs is to ensure a systemic approach to stakeholder engagement by developing a Stakeholder Engagement Plan (SEP) for the project. The Specialist will prepare a SEP proportional to the scale and complexity of the project and its associated risks and impacts in close coordination with PIUs following a four-step approach:

- (i) **Stakeholder mapping and initial consultations:** identify key stakeholders, classified into project-affected and other interested parties; and hold initial consultations.
- (ii) **Preparation of a preliminary SEP based on initial consultations:** Based on stakeholder feedback from the initial consultations, develop a draft SEP with detailed description of activities, roles and responsibilities, timeframe, and budget.
- (iii) **Consultations on the preliminary SEP and feedback documentation** for key stakeholders and stakeholder groups;
- (iv) **Preparation of the appraisal-stage SEP:** revise and further develop the draft SEP based on stakeholder feedback.
- (v) **Implementation and monitoring:** Monitor and lead in implementation of SEP.

The Stakeholder Engagement Plan will need to comply with the World Bank's ESS10 on Stakeholder Engagement and Information Disclosure, and will include the following key elements (see detailed outline in Annex I):

- Introduction / Project Description
- Brief Summary of Previous Stakeholder Engagement Activities
- Stakeholder Identification and Analysis
- Stakeholder Engagement Program
- Grievance Redress Mechanism
- Gender-Based Violence (GBV) at the Project sites and Addressing Them

⁹ World Bank. September 2023, 'Living Conditions Brief, Cox's Bazar Panel Survey Round 2 (2023)'.

¹⁰ Bangladesh Navy. September 2023.

- Roles, Responsibilities, and Resources for Stakeholder Engagement (including budget)
- Monitoring and Reporting
- Annexes

Annexes of the SEP may include: Sample minutes form/s from interviews and consultations conducted; Grievance Submission Form; Stakeholder Mapping or Diagram; documentation from correspondence or minutes of other consultations conducted, e.g., workshops, roundtables, regional events, etc.

Specific Tasks for the Specialist

The Specialist will be required to undertake the following tasks:

- Stakeholder mapping and analysis and initial consultations: identify key stakeholders, classified into project affected and other interested parties, and support initial consultations.
- Initial stakeholder mapping and analysis based on desk review and initial consultations. The stakeholder identification should cover wider area than the project will affect if a location has not yet been identified.
- Identify key stakeholders and classify them into affected parties and other interested parties.
- Identify those project-affected parties (individuals or groups) who, because of their circumstances, may be disadvantaged or vulnerable, and due to their characteristics, may be more likely to be adversely affected by the project impacts or more limited than others in their ability to take advantage of the project's benefits. Ensure that the stakeholder mapping is both gender- and age-sensitive. Further, the consultant should keep the four corporate gender pillars in mind (Improving Gaps in Human Endowments (Health/Education); Removing Constraints for More and Better Jobs; Removing Barriers to Women's Ownership and Control of Assets; Enhancing Women's Voice & Agency and Engaging Men and Boys) while engaging with particularly female stakeholders so that any issues with gender parity and women participation are addressed and GBV analysis can be made following the GPN.

Deliverables

The Project Preparation stage of this assignment is expected to be completed in about **12 weeks**.

- a) Prepare an inception report which includes information on stakeholders and groups that need to be consulted and engaged. – **2 weeks**
- b) Prepare and disclose a preliminary SEP ahead of the consultations. – **6 weeks**
- c) Prepare a revised version of SEP based on consultations, other stakeholder engagement, and PIU/World Bank feedback. – **2 weeks**
- d) Submit and disclose the appraisal-stage SEP. – **2 weeks**

Required Skills and Qualification

The Specialist must meet the following requirements:

- Masters' degree in Social Sciences, Development Studies, or a similar discipline.
- At least **5** years of experience in the field of social development, including extensive experience in stakeholder consultation, communication, mobilization, engagement, policy and advocacy work etc.
- Experience in conducting focus group discussions and participatory approaches of engagement such as PRA and in working with groups with low literacy levels.

- Sound knowledge of E&S requirements of international banks; knowledge of World Bank procedures will be a plus
- Ability to work independently and undertake the field assignments.
- Proven ability to work in a collaborative, team environment.
- Written and oral fluency in English required.

Demonstrated computer user skills (e.g., desktop application MS Office such as Word, Excel, and Power Point).

Annex 4: Sample ToR for Gender Specialist

The project is designed to provide support to Displaced Rohingya People (DRP) the host communities in fulfilling basic needs and improving livelihoods. In the Cox's Bazar camps and the surrounding host communities, significant fraction of population does not have adequate access basic WASH facilities. 46 percent of host community households and 17 percent of DRP households use unimproved sanitation facilities.¹¹ Even though DRP households have relatively better access to sanitation facilities than host communities, capacity of these facilities remains constrained as compared to the service demands. For instance, most of the community facilities are shared by more than 20 families for drinking water which leads to access, safety and gender violence related issues.

To reduce the strain on livelihoods and basic service delivery in Cox's Bazar, the GoB has facilitated the voluntary relocation of around 30,000 DRP to Bhasan Char since 2021. Bhasan Char, an island located in the Bay of Bengal in the Noakhali District, emerged in 2006 as an island formed of Himalayan silt and sediments. The GoB has invested around US\$400 million to make the island livable. Notable infrastructure developments include an 11km embankment to protect 1700 hectares of land; 1440 housing facilities; 120 cyclone shelters; one government hospital; 29 schools; and WASH facilities supported by about 1.8MWp centralized and standalone solar PV based power systems.¹² Among many, key needs in Bhasan Char include improvement and maintenance of existing infrastructure; accessibility to neighboring lands; and health, livelihoods and education.

II – SCOPE OF WORK AND KEY ACTIVITIES

- **Review and assess existing project documents** including those regulating the work of the Contractor(s) (e.g. Operations Manual, environmental and social commitment plans - ESCP, environmental and social management frameworks/plans - ESMF/P, stakeholder commitment plans, labor management plans, codes of conduct, grievances redress mechanisms - GRM, bidding documents, etc.) and determine their effectiveness to address risks linked to sexual harassment and sexual exploitation and abuse, as well as the current measures being used to prevent and respond to any incidents. Meet with key staff in (locations) in order to review prevention and response processes, staff sensitization/training and effectiveness of existing GRM/ complaints mechanisms.
 - Assess quality, confidentiality and comprehensiveness of existing protocols being used if grievances related to SEA/SH are reported (linking survivors to services and avoiding re-victimization).
 - Assess quality, confidentiality and comprehensiveness of clear and confidential protocols for preventing SEA/SH.
- Make practical recommendations through the **development a work plan with concrete measures to implement key recommendations** to strengthen systems for SEA prevention and response in coordination with the Task Team), based on World Bank Good Practice Note for Addressing Gender Based Violence in Investment Project Financing Involving Major Civil Works and an assessment of the existing GBV risk management systems in place as part of the project implementation.
- **Organize/facilitate initial training of project related staff on GBV drivers**, risks and mitigation measures. Provide support for organizing trainings of PIU and project-related staff on SEA/SH risk mitigation, including codes of conduct and GRM.

¹¹ World Bank. September 2023, 'Living Conditions Brief, Cox's Bazar Panel Survey Round 2 (2023)'.

¹² Bangladesh Navy. September 2023.

- **Support the task team/contractor with the implementation of the GBV Action Plan (and any further mitigation measures)** in line with local labor legislation and a survivor-centred approach, including i) an awareness raising strategy, describing how workers and local communities will be sensitized to GBV risks, and the worker's responsibilities under the CoC; ii) a response protocol, including GBV service providers to which GBV survivors will be referred, and the services which will be available; iii) a GRM and allegation procedures, including how the project will provide information to employees and the community on how to report cases of GBV CoC breaches to the GRM and; iv) an Accountability framework to hold accountable alleged perpetrators associated to the project.
- **Assess the need and support implementation of community consultations with women to take place during upcoming implementation support missions**, in order to understand potential risks and the best ways to make project benefits accessible to women.
- **Support the development or adaptation of Codes of Conduct (CoC)** for workers (and GBV clauses in contracts promoting the inclusion of women and girls in the project, if applicable) based on best practice. Support the task team and contractors in rolling out the CoC, including training and documentation the process of implementation (challenges and lessons learned).
- **Develop or adapt a Standard Operating Procedures for a Gender Based Violence Grievance Redress Mechanism (GRM)** based on best practices in order to effectively collect information on instances of SEA/SH in coordination with the project task team and implementation unit. Support rolling out the GBV GRM, including training project related staff, labor, community members, hospital management, waste workers or others as needed, and document the process of implementation including challenges and lessons learned.
- **Support the development and costing of a survivor-centered protocol to respond to cases of GBV** reported through the GRM as part of the overall project framework. This should include adding to or creating GBV service providers mapping of priority project areas.
- Provide **recommendations and costing for the implementation of community awareness raising activities** that include the risk of SEA related to the project, the code of conduct for workers, the GRM and the ways in which the community members can safely report concerns.
- Provide **recommendations on integrating a gender lens** into any ongoing impact evaluations or project-related research (if relevant), and to gather lessons learned in cases where project activities are already finished and can no longer be retrofitted

III - Scope of work and methodology

- *Desk review and analysis of relevant documents:*
 - **Project documents prepared by** respective ministry, contractor and integrating gender and GBV implications where appropriate.
 - **Systems put in place by the relevant operations** - This will include Incident Reporting Procedures; Terms of Reference or existing Codes of Conduct for Contractors; instruments, including ESMF/P, stakeholder engagement plans, labor management plans, etc.; monitoring reports by contractors, GRM manual and reports as well as fact finding reports on most any previous allegations of SEA, etc. This could include examining processes for implementing and monitoring COCs, collecting and analyzing information on actual/potential risk factors for vulnerability to sexual exploitation and abuse and elaborating measures to address them.
 - **Best practices for accountability measures**, including CoCs, GRMs and SEA/SH risk mitigation and prevention measures relevant to the project.
- *Key informant interviews*

- Semi-structured interviews with Government Counterparts/implementing agencies, NGO staff, relevant WB Program Leaders, Task Teams and Social specialists, other staff providing oversight in terms of SEA/SH prevention/response. The primary purpose of these interviews is to fully understand the set of measures put in place to address SEA in key sectors and the extent to which they meet global best practice requirements, as well as to understand the feasibility of initially proposed retrofitting recommendations.
- Meet with the task team in order to review prevention and response processes, including staff training and monitoring, existence of complaints mechanisms, including community awareness raising re: making a complaint, and availability/provision of survivor-centered services for an alleged survivor.
- Assess comprehensiveness of clear and confidential protocols to be followed if cases of SEA/SH are reported (linking survivors to services and avoiding re-victimization). If gaps are identified make recommendation to, i) strengthen the reporting response framework outlining procedures and guidelines targeting government partners and contracting firms associated with the project; ii) develop recommendations to strengthen the referral pathway for survivors that should be implemented as soon as a case is reported, verified or not.
- Engage with counterparts directly involved in the project implementation regarding their intervention in any cases of SEA/SH, as well as to assess the extent of internal knowledge on this issue. The Specialist should meet in particular with the social and/or GRM focal points or the Operational Safety and Health team within the project to assess knowledge of appropriate and ethical measures to report and respond to cases of SEA/GBV. When meeting with those managing the GRM the Specialist should verify whether and how the grievance redress mechanism collects SEA/SH related complaints in a safe manner, without increasing risk to survivors and keeping anonymity if at all possible.
- Engage with secondary sources of information on the potential risks of GBV linked to the project and on the appropriate entry points for the development of a GBV-sensitive GRM. This will include women's organizations, GBV service providers active in the zone of implementation of the project, community leaders, and other community members with key information on the experiences of women and girls in communities affected by the project.

Rolling out appropriate systems

- Help Task Team set up GBV GRM, facilitate it running smoothly and monitor and record complaints received
- Help in rolling out appropriate COCs, ensuring requirements in CoCs are clearly understood by those signing and signed by all workers present in project site.
- Clearly define the GBV requirements and expectations in the bidding documents for contractor
- Help Task team implement appropriate project related civil works for labor to reduce GBV risks. This can include separate, safe and easily accessible facilities for women and men working on the site like well-lit locker rooms and/or latrines located in separate areas, with the ability to be locked from the inside.
- Help in setting up IEC campaigns. Ensure that display signs are visible around the project site that signal to workers and the community that the project site is an area where GBV is prohibited.
- Monitoring all GBV related activities

The assignment will include office-based work and travel to project sites in Bangladesh as identified by and coordinated with the Task Team. Key activities during field work may include:

- Meeting with the project teams in order to review prevention and response processes linked to SEA/SH (staff training and monitoring, existence of complaints mechanisms, community awareness, and availability/provision of survivor-centered services for an alleged survivor);
- Consultations with communities surrounding the project.

IV - Deliverables

The Specialist will prepare the following outputs:

1. Assessment report and work plan with measures to strengthen SEA/SH prevention and response mechanisms under project,
2. Carry out tasks set in Gender and GBV Action Plan, and further enhance/strengthen risk prevention and mitigation methods.
3. Rolling out appropriate systems as outlined.
4. Relevant trainings to sensitize community and project related staff about GBV issues, methods of reporting grievances.
5. Revised E&S instruments to integrate GBV risk mitigation measures in line with risks identified and good practices, in the country and in other WB funded projects.
6. Completed monitoring tool with up-to-date progress for each sub- project.

V - Reporting, Remuneration, Timing, and language of outputs

The initial duration of this assignment will be for XXX days until XXX. The work will be supervised by The PD. The outputs outlined above will be produced in English and in Bangla (when required).

VI - Key skills, technical background and experience required.

- Minimum of 5 years relevant professional work experience at national and international levels in development or humanitarian field, with a focus on the prevention and response to gender-based violence.
- Operational experience on the ground in low- and/or middle-income countries in the implementation of programs related to violence against women and girls, sexual exploitation and abuse, gender, and child protection.
- Proven research skills and demonstrated expertise in analysis and development of technical papers and reports as well as programmatic guidance related to violence against women and children.
- Familiar and able to operationalize international standards, procedures for prevention and response to GBV, safe and ethical GBV data collection, and of key standards and resources on GBV in emergencies.
- Experience of collaborating with Government entities in GBV program implementation considered an asset.
- Direct experience in collecting, analyzing, and comparing data related to GBV.
- Knowledge and experience of World Bank policies and operations considered an asset.
- Excellent analytical, communication, writing, presentation/facilitation and editorial skills in English and Bangla.
- Willingness to travel regularly to engage with Task Teams on operational issues and advisory activities related to GBV.
- Commitment to a survivor-centered approach.

Annex 5: World Bank GRM Checklist

Checklist to accompany the Guidance Note for ESS10: Stakeholder Engagement and Information Disclosure

This Checklist provides guidance for the Borrower on the application of the Environmental and Social Standards (ESSs), which form part of the World Bank's 2016 Environmental and Social Framework. Checklists help to illustrate the requirements of the ESSs and propose sample approaches to implement some of the requirements of the ESSs; they are not Bank policy, nor are they mandatory. Checklists do not substitute for the need to exercise sound judgment in making project decisions. In case of any inconsistency or conflict between the Checklists and the ESSs, the provisions of the ESSs prevail.

Grievance Redress Mechanism Checklist

The appropriate level of complexity of a project's Grievance Redress Mechanism (GRM) depends on the risks and impacts of the project and the project context. The following checklist describes a complex GRM that adheres to good international practice, which may not be necessary for all projects. Nevertheless, this checklist helps to determine whether a grievance mechanism conforms to good international practice.

A. System issues

1. Does the project invite feedback/grievances? Yes___ No___
2. Does the organization have a policy on grievance redress? Yes___ No___
 - a) Is the policy available to all staff, beneficiaries, and potential users? Yes___ No___
 - b) Is the policy written in the local language(s)? Yes___ No___
3. Does the grievance mechanism have the following features?
 - a) A clearly understood procedure for people to provide feedback and/or submit grievances. Yes___ No___
 - b) A statement of who is responsible for dealing with feedback/ grievances. Yes___ No___
Procedures for resolving or mediating and investigating grievances depending on their seriousness and complexity. Yes___ No___
 - c) A system for keeping complainants informed of status updates. Yes___ No___
 - d) A system for recording feedback/grievances and outcomes. Yes___ No___
 - e) Procedures for protecting confidentiality of complainants Yes___ No___

B. Staff management

1. Is there a grievance manual for staff? Yes___ No___
2. Do the grievance policy and/or procedures provide guidance on:
 - a) What is a grievance/feedback? Yes___ No___
 - b) What information to collect from complainants? Yes___ No___
 - c) What remedies can or should be used to resolve grievances? Yes___ No___
3. Are the grievance policy and procedures communicated to all staff? Yes___ No___
4. Are adequate resources allocated for the GM to function effectively? Yes___ No___
5. Does the organization provide training on grievance management to staff? Yes___ No___

C. Communication to grievance mechanism users

1. Are users told how to submit grievances/feedback? Yes___ No___
 - a) Is an information brochure on the grievance mechanism available to users? Yes___ No___
 - b) Are feedback/grievance forms available to users? Yes___ No___
 - c) Are grievance forms or signs displayed prominently and readily accessible? Yes___ No___
 - d) Are contact details of staff receiving feedback/grievance published and displayed in public areas? Yes___ No___
 - e) Is information on grievance management available in local languages? Yes___ No___
2. Are users able to submit grievances/feedback:
 - a) In writing Yes___ No___
 - b) By email Yes___ No___
 - c) By fax Yes___ No___
 - d) By telephone Yes___ No___
 - e) In person Yes___ No___
3. Are users provided with assistance to submit feedback/grievances where needed? Yes___ No___
4. Can the grievance mechanism be accessed free of charge? Yes___ No___
5. Are users promised confidentiality? Yes___ No___
6. Are users informed about the appeals process? Yes___ No___

D. Feedback/grievance recording

1. Are all feedback/grievances recorded? Yes___ No___
 - a) Are grievances/feedback logged and documented? Yes___ No___
 - b) Are inquiries/suggestions and recommendations recorded? Yes___ No___
 - c) Are the outcomes and responses to all grievances/feedback recorded? Yes___ No___

E. Business standards

1. Are there business standards in place for the process and timing with which grievances/feedback are dealt with? Yes___ No___
 - a) Is receipt acknowledged within a stipulated time frame? Yes___ No___
 - b) Are the grievances supposed to be resolved within a stipulated time frame? Yes___ No___
2. Is there a quality control system in place to:
 - a) Check if all grievances have been dealt with or acted upon. Yes___ No___
 - b) Check if all aspects of a grievance have been addressed. Yes___ No___
 - c) Check if all necessary follow-up action has been taken. Yes___ No___

F. Analysis and feedback

1. Are regular internal reports on grievances/feedback produced for senior management? Yes___ No___
2. Grievances/feedback reports include data on:
 - a) Numbers of grievances/feedback received. Yes___ No___
 - b) Compliance with business standards. Yes___ No___
 - c) Issues raised in grievances/feedback. Yes___ No___
 - d) Trends in grievances/feedback over time. Yes___ No___
 - e) The causes of grievances/feedback. Yes___ No___
 - f) Whether remedial action was warranted. Yes___ No___
 - g) What redress was actually provided? Yes___ No___
 - h) Recommendations/strategies to prevent or limit future recurrences. Yes___ No___

3. Are reports about grievances/feedback made public, periodically? Yes___ No___

Annex 6: ToR for External Monitor/M&E consultant

Project Description

The project is designed to provide support to Displaced Rohingya People (DRP) the host communities in fulfilling basic needs and improving livelihoods. In the Cox's Bazar camps and the surrounding host communities, significant fraction of population does not have adequate access basic WASH facilities. 46 percent of host community households and 17 percent of DRP households use unimproved sanitation facilities.¹³ Even though DRP households have relatively better access to sanitation facilities than host communities, capacity of these facilities remains constrained as compared to the service demands. For instance, most of the community facilities are shared by more than 20 families for drinking water which leads to access, safety and gender violence related issues.

To reduce the strain on livelihoods and basic service delivery in Cox's Bazar, the GoB has facilitated the voluntary relocation of around 30,000 DRP to Bhasan Char since 2021. Bhasan Char, an island located in the Bay of Bengal in the Noakhali District, emerged in 2006 as an island formed of Himalayan silt and sediments. The GoB has invested around US\$400 million to make the island livable. Notable infrastructure developments include an 11km embankment to protect 1700 hectares of land; 1440 housing facilities; 120 cyclone shelters; one government hospital; 29 schools; and WASH facilities supported by about 1.8MWp centralized and standalone solar PV based power systems.¹⁴ Among many, key needs in Bhasan Char include improvement and maintenance of existing infrastructure; accessibility to neighboring lands; and health, livelihoods and education.

KEY OBJECTIVE OF EXTERNAL MONITORING

Monitoring is an integral part of the resettlement process. As part of this Project, a three-tier monitoring system has been designed to monitor and evaluate the progress of the Social Action Plan. These 3-levels comprise of: a) Internal monitoring at EA level involving the INGO, Contractor and PIU offices; b) monitoring by project construction supervision consultant (CSC) and c) independent external monitoring. The primary objective for engaging an independent external monitor is to review the efficacy of internal monitoring, design and conduct periodic third-party monitoring and feedback and GoB on policy improvement and enhancement of implementation process. The External Monitoring Agency (EMA) will review implementation process as per set policies in the E&S documents and assess the achievement of resettlement objectives, the changes in living standards and livelihoods, restoration of the economic and social base of the affected people, the effectiveness, impact and sustainability of entitlements, the need for further mitigation measures if any, and to learn strategic lessons for future policy formulation and planning.

SCOPE OF WORK

The scope of work of the External Monitoring Agency (EMA) will include the following tasks:

- i. To develop specific monitoring indicators for undertaking monitoring of all aspects of ESIA and other Plans
- ii. To review and verify the progress in plans implementation of the Project.

¹³ World Bank. September 2023, 'Living Conditions Brief, Cox's Bazar Panel Survey Round 2 (2023)'.

¹⁴ Bangladesh Navy. September 2023.

- iii. Identify the strengths and weaknesses of the plans objectives and approaches, implementation strategies.
- iv. To analyze the pre-and post-project socio-economic conditions of the affected people. In the absence of baseline socio-economic data on income and living standards, and given the difficulty of APs having accurate recollection of their pre-project income and living standards, develop some quality checks on the information to be obtained from the APs. Such quality checks could include verification by neighbors and local village leaders. The methodology for assessment should be very explicit, noting any qualifications.
- v. To monitor and evaluate the implementation of ESMP along with other plans of the project
- vi. Review results of internal monitoring and verify claims through sampling check at the field level to assess whether outputs/ objectives have been generally met.
- vii. To monitor and assess the adequacy and effectiveness of the consultative process with affected APs, particularly those vulnerable, including the adequacy and effectiveness of grievance procedures and legal redress available to the affected parties, and dissemination of information about these.
- viii. Identify, quantify, and qualify the types of conflicts and grievances reported and resolved and the consultation and participation procedures.
- ix. Verify expenditure & adequacy of budget for resettlement activities.
- x. Describe any lessons learned that might be useful in developing the new national level E&S related policy and legal/institutional framework for involuntary resettlement.

METHODOLOGY AND APPROACH

The monitoring should be supplement by focus group discussions (FGD) which would allow the monitors to consult a range of stakeholders (local government field staff, NGOs, community leaders, and, most importantly, APs) and community public meetings which are open public meetings at the sites to elicit information about performance of various resettlement activities.

TEAM COMPOSITION OF THE EXTERNAL MONITORING AGENCY

The EMA should focus on field-based research on institutional arrangement, implementation strategy, policy objectives and the targets. In addition, data collection, processing and analysis should be performed to pin point problem areas and weaknesses and to highlight corrective measures, if needed, to achieve the objectives on schedule. Thus, there is a need for a dedicated monitoring team with adequate gender representation. Further, it is essential that the central team or field level coordinators responsible for monitoring, are skilled and trained in data base management, interview technique as well as social and economic/finance. Keeping in mind these criteria, the team should ideally include:

Position/expertise	Qualification and experience
1. Team Leader/ Implementation Specialist/ Environmental Specialist	Masters in Environmental Science/Engineering with 15 years working background in planning, implementation and monitoring of E&S for infrastructure projects. Experience in institutional capacity analysis and implementation arrangement for preparation and implementation of ESIA/ ESMP, and knowledge in latest environment and social policies of the international development financing institutions in Bangladesh are

Position/expertise	Qualification and experience
	preferred.
2.Social Impact Specialist	Masters in social science/science with 15 years working experience in social impact assessment including census and socioeconomic surveys, stakeholders' consultation, and analyzing social impacts to identify mitigation measures in compliance with social policies of the international development financing institutions and national legislations. Experience of preparing resettlement framework and action plans and implementation of plans for externally financed projects is essential.
3.Gender Specialist	Masters in social science with 15 years working experience in relevant field; Thorough knowledge of gender issues and their implications in development projects; research and work experience relating to gender issues; and knowledge of techniques and their applications in mobilizing community participation in development programs.
4.Data Analyst	Graduate with working experience and knowledge of software, those are most commonly used in Bangladesh; demonstrated ability to design and implement automated MIS(s) for monitoring progress, comparing targets with achieved progress and the procedural steps.

TIME FRAME AND REPORTING

The EMA will be employed over a period of 5 years with intermittent inputs from the professional team to continue one year after completion of implementation period.

Quarterly and annual monitoring reports should be submitted to the PSC with copies to the World Bank. An evaluation report at the end of the Project should be submitted to the PSC with critical analysis of the achievement of the projects and the performance of MoHFW, MoLGRDC and other related Consultants etc.

QUALIFICATION OF THE EXTERNAL MONITORING AGENCY

The EMA will have at least 10 years of experience in resettlement/ES policy analysis and implementation of resettlement plans/EMPS. Further, work experience and familiarity with all aspects of ES operations would be desirable. NGOs, Consulting Firms (consultant organization) having requisite capacity and experience as follows can qualify for services of and external monitor for the Project.

- NGOs registered with the Social Welfare Department of the GOB, Consulting Firms registered with the Joint Stock Company.
- The applicant should have prior experience in social surveys in land-based infrastructure projects and preparation of ES related documents as per international standards/ as per guidelines of World Bank.

- iii. The applicant should have extensive experience in implementation and monitoring of different ES plans, preparation of implementation tools, and development and operation of automated MIS for monitoring.
- iv. The applicant should be able to produce evidences of monitoring using structured instruments and computerized MIS with set criteria for measuring achievement.
- v. The applicant should have adequate manpower with capacity and expertise in the field of planning, implementation and monitoring of involuntary resettlement projects as per donor's guidelines.

Interested agencies should submit proposal for the work with a brief statement of the approach, methodology, and relevant information concerning previous experience on monitoring of resettlement implementation and preparation of reports.

The profile of consultant agency, along with full CVs of the team to be engaged, must be submitted along with the proposal.

BUDGET AND LOGISTICS

The budget should include all expenses such as staff salary, office accommodation, training, computer / software, transport, field expenses and other logistics necessary for field activities, data collection, processing and analysis for monitoring and evaluation work. Additional expense claims whatsoever outside the proposed and negotiated budget will not be entertained. VAT, Income Tax and other charges admissible will be deducted at source as per GOB laws.

Annex 7: Exclusions List

- Hatiya, Noakhali, and Bhasan Char are within the Ganges-Brahmaputra-Meghna Delta Key Biodiversity Area (KBA) and Important Bird Area (IBA). No new or rehabilitation activity will be supported which will adversely impact the species and biodiversity features for which these areas are designated. IBAT provides the following link to the IUCN KBA website: <https://www.keybiodiversityareas.org/site/factsheet/15230> and Birdlife IBA website: <https://datazone.birdlife.org/site/factsheet/ganges-brahmaputra-meghna-delta-iba-bangladesh>
- Activities with potential to adversely impact Ganges River Dolphin or Irrawaddy Dolphin will not be supported.
- Construction and/or rehabilitation of large wastewater treatment plants, large surface water treatment plant, the desilting of surface waters, and large-scale water (surface and groundwater) resource infrastructure, including large dams or activities involving the allocation or conveyance of water, such as inter-basin water transfers or activities resulting in significant changes to water quality or availability.
- Construction of cross dam, large scale bridge, tidal basin water infrastructure including new jetty construction for connecting the Bhasan char or other islands to mainland.
- Any activity resulting change in river-morphology, marine eco-system, flow diversion will be excluded.
- Activities resulting disposal of untreated wastes will be excluded.
- Activities requiring land acquisition and major displacement (minor temporary impacts will be managed under RPF).
- Any activities that may require relocating mosques, temples, graveyards, cremation grounds, and other places/objects that are of religious and cultural significance.
- Activities that may significantly restrict access to common property resources and livelihood activities of groups and communities.
- Activities with high E&S risks and impacts
- Any displacement or adverse negative impacts on SECs likeland, customary rights, livelihoods, culturerequiring Free, Prior Informed Consent (FPIC)

Annex 8: Chance Find Guidelines

Subproject activities could impact sites of social, sacred, religious, or heritage value. “Chance find” procedures would apply when those sites are identified during the design phase or during the actual construction/research period and the related activity will not be eligible for financing under the project.

- (1) Cultural property includes monuments, structures, works of art, or sites of significant points of view, and are defined as sites and structures having archaeological, historical, architectural, or religious significance, and natural sites with cultural values. This includes cemeteries, graveyards and graves.
- (2) The list of negative attributes which would make a subproject ineligible for support includes any activity that would adversely impact cultural property.

- (3) In the event of finding of properties of cultural value during construction/research, the following procedures for identification, protection from theft, and treatment of discovered artifacts should be followed and included in standard bidding document.
 - (a) Stop the construction/research activities in the area of the chance find;
 - (b) Delineate the discovered site or area;
 - (c) Secure the site to prevent any damage or loss of removable objects.
 - (d) Notify the supervisory Engineer who in turn will notify the responsible local authorities;
 - (e) Responsible local authorities and the relevant Ministry would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures.
 - (f) Decisions on how to handle the finding shall be taken by the responsible authorities and the relevant Ministry. This could include changes in the layout (such as when finding an irremovable remain of cultural or archeological importance), conservation, restoration and salvage.
 - (g) Implementation of the authority decision concerning the management of the finding shall be communicated in writing by the relevant Ministry.
 - (h) Construction/research work could resume only after permission is given from the responsible local authorities and the relevant Ministry concerning safeguard of the heritage.
- (4) These procedures must be referred to as standard provisions in construction/research contracts. During project supervision, the Environmental/Social Consultant shall monitor the above regulations relating to the treatment of any chance find encountered.
- (5) Relevant findings will be recorded in World Bank Supervision Reports and Implementation Completion Reports will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

Annex 9: Environmental and Social Screening Form

Section A: Sub-Project Overview

Description of sub-project/component interventions:
Sub-project Location:
Expected construction period:
Description of project intervention area and project influence area with schematic diagram (where relevant, indicate distance to sensitive environmental areas and historical or cultural assets): Please also explain any analysis on alternative location was conducted

Section B: Environmental Screening

B.1: Environmental feature of sub-project location

Description of cultural properties (if applicable, including distance from site):
<p>Location of environmentally important and sensitive areas:</p> <p>(1) potential impacts on remaining forests in/around camps Yes/No</p> <p>(2) Other issues:</p> <p>*This question needs to be answered by checking the elephant migration route map established by UNHCR/IUCN</p>
Baseline air quality and noise levels:
<p>Baseline soil quality:</p> <p>Landslide potential (high/medium/low, with explanation):</p>
Baseline surface water and groundwater quality (FE, TDS, fecal coliform, pH):
Status of wildlife movement:
State of forestation:
Summary of water balance analysis (For water supply scheme only):

Please consider (i) water requirements of newly forested areas for plants' total evapotranspiration, (ii) new settlements water supply requirement for drinking water, household use, bathing and sanitation, (iii) replenishment rate from annual rainfall etc.

B.2: Pre construction Phase

Information on Ancillary Facilities (e.g. status of access road or any other facility required for sub-project to be viable):

Requirement of accommodation or service amenities(toilet, water supply, electricity) to support the work force during construction:

Possible location of labor camps:

Requirement and type of raw materials (e.g. sand, stone, wood, etc.):

Identification of access road for transportation (Yes/No):

Location identification for raw material storage:

Possible composition and quantities of wastes (Solids wastes, demolition materials, sludge from old latrines, etc.):

B.3: Construction Phase

Type and quantity of waste generated (e.g. Solids wastes, liquid wastes, etc.):
Type and quantity of raw materials used (wood, bricks, cement, water, etc.):
Approx. area (in square meters) of vegetation and soil in the right-of-way, borrow pits, waste dumps, and equipment yards:
Possibility of stagnant water bodies in borrow pits, quarries, etc., encouraging mosquito breeding and other disease vectors: (High/Medium/Low with explanation)
Disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes): (High/Medium/Low with description)
Destruction or damage of terrestrial or aquatic ecosystems or endangered species directly or by induced development: (High/Medium/Low with description)
Activities that can lead to landslides, slumps, slips and other mass movements in roadcuts:
Erosion of lands below the road bed receiving concentrated outflow carried by covered or open drains: (High/Medium/Low with description)
Describe possible traffic movement impacts on (unwanted) light, noise and air pollution:

High = Likely to cause long-term impacts or over large area (>1sqkm); Medium = Likely to cause temporary damage or over moderate area (0.5 to 1sqkm); Low = Likely to cause little, short-term damage and over small area (<0.5sqkm)

B.4: Operation Phase

Activities leading to health hazards and interference of plant growth adjacent to roads by dust raised and blown by vehicles:
Chance of long-term or semi-permanent destruction of soils: (High/Medium/Low with description)

Possibility of odor and water, soil quality impacts from SWM and FSM disposal system: (High/Medium/Low with description)
Possibility of stagnant waterbodiesinborrow pits,quarries, etc., encouragingformosquito breedingand otherdisease vectors: (High/Medium/Low with explanation)
Likely direct and indirect impacts on economic development in the project areas by the sub-project:
Extent of disturbanceormodification ofexisting drainagechannels(rivers,canals)orsurface waterbodies(wetlandsmarshes): (High/Medium/Low with description)
Extent of destructionordamageofterrestrialoraquaticecosystemsorendangeredspeciesdirectly or byinduceddevelopment: (High/Medium/Low with description)
Activitiesleadingtolandslides,slumps,slipsandothermassmovements in roadcuts:
Erosionoflandsbelowtheroadbedreceiving concentratedoutflow carriedbycoveredoropendrain: (High/Medium/Low with explanation)
Describe possible traffic movement impacts on (unwanted) light, noise and air pollution:

High = Likely to cause long-term impacts or over large area (>1sqkm); Medium = Likely to cause temporary damage or over moderate area (0.5 to 1sqkm); Low = Likely to cause little, short-term damage and over small area (<0.5sqkm)

Section C: Social Screening

C.1 General Labor Influx Screening

Key Screening questions	Aspects to Consider
Will the project potentially involve an influx of workers to the project location, and will the influx be considered significant for the local community?	How many foreign and local workers will be needed for the remaining period of the project, with what skill set? Can the project hire workers from the local workforce? What is the size and skill level of the existing local workforce? If the skill level of the local workforce does not match the needs of the project, can they be trained within a reasonable timeframe to meet project requirements? How will the workers be accommodated? Will they commute or reside on site or outside of the camp? If so, what size of camp will be required?
Is the project located in a rural or remote area?	What is the size of local population in the project area? What is the size of the host Rohingya community?

	<p>Is the project located / being carried out in an area that is not usually frequented by outsiders?</p> <p>What is the frequency and extent of contact between the local community and outsiders?</p> <p>Are there sensitive environmental conditions that need to be considered?</p>
Based on the socioeconomic, cultural, religious and demographic qualities of the local community, Rohingya population and the incoming workers, is there a possibility that their presence or interaction with the local community could create adverse impacts?	<p>Is it likely that the incoming workers and the local community come from a shared socio-economic, cultural, religious or demographic background?</p> <p>What is the level of existing resources, and will the incoming workers use or create competition for these resources?</p> <p>What is the expected duration of the incoming workers' presence in the community?</p> <p>Given the characteristics of the local community, are there any specific adverse impacts that may be anticipated?</p>
Consultation with Community People	<p>Has the project authority and contractors conducted any consultation meetings with the community people and Rohingya population?</p> <p>Are local people aware about the labors?</p> <p>Has the project authority involved the local community with the project?</p>

Involuntary restrictions on land use or on access to legally designated parks and protected areas				
10. Will people lose access to natural resources, communal facilities and services?				
11. If land use is changed, will it have an adverse impact on social and economic activities?				
12. Will access to land and resources owned communally or by the state be restricted?				
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project?	[]	No	[]	
Yes				
If yes, approximately how many?				
Are any of them poor, female-heads of households, or vulnerable to poverty risks?	[]	No	[]	
Yes				
Are any displaced persons from indigenous or ethnic minority groups?	[]	No	[]	
Yes				
During Screening, project authority will conduct consultation with the primary and secondary stakeholders and provide their observations in the following sections (13 to 18)				

13: Who are the stakeholders of the project?
Answer:
14: What social and cultural factors affect the ability of stakeholders to participate or benefit from the proposed policy or project?
Answer:
15: Are project objectives consistent with their needs, interests and capacity?
Answer:
16: What will be the impact of the project or sub-project on the various stakeholders, especially women and vulnerable groups?
Answer:
17: What social risks might affect project or sub-project success?
Answer:
18: Has the project authority or any other organizations conducted any consultations with the affected community or people? If yes. Please provide a summary.
Answer:

C.3. Social Capital Format

The objective is to list various types of social institutes/bodies working in the camp, intended project influence areas to enlist them for the possible inclusion in the management, and monitoring of the projects. List the name of social institutes/ bodies under the given categorization along with the following information. Use separate sheet for each category of social institute/body. The information can be collected through secondary sources such as RRC/UN agencies or different development organizations that are involved with the Rohingya crisis projects, etc.

Type of Social Institutes/bodies	Name of the Institution	Contact Person and Address and phone number	Primary areas of Work	Coverage areas in the camp and communities (list name of the places)
Government Organizations				
UN Agencies				
National Organizations				
Community Based Volunteer Organizations are those, which constitute the members of the				

community working towards social development.				
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Section D: Environmental and Social Screening Summary

Please summarize the results of environmental and social screening conducted above. Mitigation measures need to be proposed in referenced to ESMP Guidelines relevant to the type of the sub-project, proposed in Section 8.2 of ESMF. This table needs to be completed by both environmental and social specialists. Please add rows to the table as necessary.

Section	Main Environmental and Social Impacts	Impact Significance*	Suggested Mitigation Measures	Person/Institution Responsible	Monitoring Suggestions	
					Indicators	Frequency
1: Sub-Project Location						
2: Pre-construction Phase						
3: Construction Phase						
4: Operational Phase						

* Overall Impact Score: High = Likely to cause long-term E&S impacts; Medium = Likely to cause temporary impacts; Low = Likely to cause little, short-term impacts

Recommendation for further environmental and social assessment and/or site specific environmental and social management plan: Yes/No

**If yes, please specify what assessments/plans would be required.*

From completed by : (Name, designation, mobile number, signature, date)
(Name, designation, mobile number, signature, date)

From checked by :

Reviewed by : (Name, designation, mobile number, signature, date)
Signature & Date:

Project Director

Annex10: Generic ToR for Environmental and Social Management Plan

A. Scope of Work

The Consultant is required to prepare ESMP highlighting a set of mitigation, monitoring, and institutional

measures to be taken during implementation and operation to eliminate or reduce adverse environmental and social impacts to acceptable levels. The plan will also include the actions needed to implement these measures. To prepare a management plan, the Consultant will identify (a) identify the set of responses to potentially adverse impacts; (b) determine requirements for ensuring that those responses are made effectively and in a timely manner; and (c) describe the means for meeting those requirements.

An ESMP should include the following components:

- **Description of Adverse Effects:** The anticipated environmental and social effects are identified and summarized.
- **Description of Mitigation Measures:** Each measure is described with reference to the effect(s) it is intended to deal with. As needed, detailed plans, designs, equipment descriptions, and operating procedures are described. Measures to enhance positive impacts should also be proposed.
- **Description of Monitoring Program:** Monitoring provides information on the occurrence of environmental effects. It helps identify how well mitigation measures are working, and where better mitigation may be needed. The monitoring program should identify what information will be collected, how, where and how often. It should also indicate at what level of effect there will be a need for further mitigation.
- **Institutional Arrangement:** The people, groups, or organizations that will carry out the mitigation and monitoring activities are defined, as well as to whom they report and are responsible. There may be a need to train people to carry out these responsibilities, and to provide them with equipment and supplies. Reporting procedure including grievance redress mechanism should

also be proposed.

- **Implementation Schedule:** The timing, frequency and duration of mitigation measures and monitoring are specified in an implementation schedule, and linked to the overall subproject schedule.
- **Cost estimates and sources of funds:** These are specified for the initial subproject investment and for the mitigation and monitoring activities as a subproject is implemented. Funds to implement the ESMP may come from the subproject grant, from the community, or both. Government agencies and NGOs may be able to assist with monitoring.

The ESMP will be required to be reviewed and cleared by the World Bank.

B. Deliverables and Proposed/Indicative Structure of ESMP Report

The proposed structure of the ESMP report is as follows:

- **Executive Summary:** This should provide a general summary of the ESMP contents and key findings, in a vocabulary that is easily understood by the general public. It should be clear, concise ranging from 3 to 5 pages;
- **Introduction:** An introduction describing the ESMP purpose, objectives, principles and methodology. This section should introduce the project proponents, the study team, and provide other relevant information. The layout of ESMP should also be described to facilitate its use;
- **Sub-Project Description:** A description of the subproject which will include background, purpose and different components. Also indicate any subproject specific resource requirements such as material, manpower, equipment, etc.
- **Environmental Baseline of Subproject Area:** This section gives site specific overview of baseline covering physical and biological environment. It will include ambient air quality, noise, temperatures, rainfall, etc.
- **Socio-Economic Profile of Subproject Area:** This section describes socio-economic profile of the subproject area. It will cover community structure, planned development activities, population, occupation and livelihoods, methods of communication and transport, cultural heritage sites, etc.
- **Stakeholder consultation and Information Disclosure:** This section will describe the objective, process, and outcome of the stakeholder consultations carried out during the ESMP preparation. This section should also list arrangements for disclosing subprojects information in order to comply with the Bank's Policy of Disclosure of Information.
- **Impacts and Mitigation:** This section will identify all positive as well as negative environmental and social impacts with cost effective and feasible measures to reduce adverse environmental impact to acceptable level. It will describe with technical details mitigation measures including the type of impact to which it relates to. It will also describe methodology for social impacts
- **Environmental Management and Monitoring Plan:** This section will provide specific description

and technical details of monitoring measures including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions. The monitoring and reporting procedures will ensure early detection of conditions that necessitate particular mitigation measures and furnish information on the progress and results of mitigation.

- **Institutional Arrangement:** Detailed description of institutional arrangements, roles and responsibilities and reporting procedures should be presented. This section should also propose capacity building and training plan for implementing agencies responsible for this project.
- **ESMP Implementation Budget:** An ESMP implementation budget estimates are provided here. The budget will include funds for institutions development activities, training programs for implementation teams and local/national institutions, technical assistance to authorities, costs for preparations of EMPs and other E&S documents; and
- **Annexures:** Technical annexes to support ESMP implementation.

C. Qualifications and Skills Required

The Consultant needs to demonstrate that the proposed ESMP preparation team has the expertise required to fully appreciate the requirements of *all* the E&S Policies to be addressed in the ESMP, and to complete *all* required sections of the ESMP. The team should include appropriate number of specialists from different disciplines including but not limited to environmental sciences, social sciences and GIS expert. The team should have complete understanding of the national legislative requirements as well as WB ESF policies.

Annex 11: Guidelines for ToR for Waste Management Plan including e-Wastes

Key issues to be considered are:

- Plan will need to be developed and implemented in accordance with the Bangladesh Hazardous Waste Management (e-wastes) Rules, 2021 and Solid Waste Management Rules, 2021.
- Any e-waste generated as a result of end of life should be stored in separate containers. The containers should be labeled as “e-waste”. Labelling system should be clear and well known to the public and workers to ensure general safety.
- Transportation of the hazardous waste container should be with special vehicle. Before the start of transporting this e-waste, a form should be filled by the generator and transporter indicating the amount of e-waste and other waste.
- E- waste and other wastes record keeping should be created and checked by PIUs from time to time to make sure that waste is well managed.

- Existing technical facilities for treating and disposing of e-waste and other wastes should be assigned before the start of the project.
- All workers should be familiar with e-waste and other wastes warning signs.