

People's Republic of Bangladesh

**Ministry of Local Government, Rural Development, and Cooperatives
(MoLGRD&C), Ministry of Road Transport and Bridges (MoRTB), and Ministry
of Power, Energy and Mineral Resources (MoPEMR).**

**Host and Rohingya Enhancement of Lives Project (HELP)
P501274**

Draft
**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

April 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The People's Republic of Bangladesh (the Recipient) will implement the Host and Rohingya Enhancement of Lives Project (HELP) (the Project), with the involvement of four Implementing Agencies (IAs): Local Government Engineering Department (LGED) and Department of Public Health Engineering (DPHE), both under the Ministries of Local government, Rural Development and Cooperatives (MoLGRD&C); Roads and Highways Department (RHD) under Road Transport and Bridges (MoRTB); and Bangladesh Power Development Board (BPDB) under the Power, Energy and Mineral Resources (MoPEMR), as set out in the Financing Agreement. The International Development Association has agreed to provide financing (P501274) for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (ES) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said ES instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the respective IA(s) and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient represented by the respective IA(s). The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of ES instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms</p>	<p>Submit quarterly progress reports to the Association throughout Project implementation, commencing three months after the Effective Date. PIU of LGED will submit the compiled progress report to the Association no later than 15 days after the end of each reporting period.</p>	LGED, DPHE, BPDB and RHD
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 24 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within 48 hours</p>	LGED, DPHE, RHD, and BPDB
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association as annexes to the reports to be submitted under action A above.</p>	LGED, DPHE, RHD, and BPDB

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain four separate PIUs (LGED, DPHE, RHD, and BPDB) with qualified staff and resources to support management of ESHS risks and impacts of the Project and appoint an Environmental Specialist, a Social Specialist, a Gender and GBV Specialist (three positions) in each PIU and a Communication Specialist with RHD, LGED and DPHE PIUs.</p> <p>Recruit a Design and Supervision Firm (LGED), Monitoring and Supervision Firm (DPHE) and Supervision Firm (RHD and BPDB) with qualified staff and resources to support management of ESHS risks and impacts of the Project, including an environmental specialist, a social specialist, and a gender and GBV specialist.</p> <p>Recruit a Monitoring and Evaluation Firm (LGED) with qualified staff and resources to monitor the ESHS risks and impacts of the project, including an environmental specialist, a social specialist, and a gender and GBV specialist.</p>	<p>Establish the PIUs within 3 months of the Effective Date and thereafter maintain them. Hire the Environmental Specialist, Social Specialist, Gender and GBV Specialist, and Communication Specialist (as applicable) within 3 months of the Effective Date. Hire a Supervision Firm(s) (as applicable/described) within 6 months of Effectiveness Date. Prior to the assignment of the specialist and Firms, assign one ES focal point from each IA.</p>	LGED, DPHE, RHD, and BPDB
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP), an Environmental and Social Management Framework (ESMF).</p> <p>Adopt and implement a Resettlement Policy Framework (RPF), a Small Ethnic Community Planning Framework (SECPF), Labor Management Procedures (LMP), and Gender and SEA/SH Action Plan, consistent with the relevant ESSs, as mentioned in respective sections below.</p> <p>Carry out site specific E&S screening and assessment in accordance with the ESMF (including the exclusion list) to identify ES risks and impacts of each sub-project as per the procedure mentioned in the ESMF including vulnerability to access development benefits, risks of GBV/SEA/SH and share the screening report with World Bank for review and clearance. Depending on the outcome of the screening result, site specific environmental and social Impact assessment/site specific ESMP and Environmental and Social Code of Practice (ESCoP) for each sub-project would be prepared and shared with the Association for review. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>Adopt and disclose the SEP by Appraisal and thereafter implement throughout Project implementation. A draft ESMF will also be disclosed by Appraisal.</p> <p>Adopt and disclose the ESMF (finalized), the RPF, and the SECPF before the commencement of site-specific screenings for any Project activity and thereafter implement them throughout Project implementation.</p> <p>Adopt and disclose the LMP, and the Gender and SEA/SH Action Plan before any project workers are hired (Including PIU workers), and thereafter implement them throughout Project Implementation.</p>	LGED, DPHE, RHD, and BPDB

	<p>Exclusion List of Activities: An exclusion list has been attached with the ESMF which is critical to follow. All projects and TA activities must be screened as per exclusion list and must strictly abide by it.</p>	<p>ES screening at the identification of subproject and if warranted from screening results the ES assessment of subprojects will be done prior to commencement of bidding process and updated within 30 days of any change in the subproject design.</p> <p>Screen activities before determining whether they are eligible to receive support from the Project.</p> <p>Adopt the ESMP before launching the bidding process for the respective subproject/Project activity and prior to the carrying out of subproject /Project activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout sub-Project implementation.</p>	
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures (LMP), and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms and UN agencies. Thereafter ensure that the contractors and supervising firms, UN agencies comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	LGED, DPHE, RHD, and BPDB
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, afforestation, and any other technical assistance activities including comprehensive environmental impact and damage assessment under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	LGED, DPHE, RHD, and BPDB

1.5	<p>CONTINGENT RESPONSE FINANCING</p> <p>Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements for the implementation of the CERC component, in accordance with the ESSs.</p> <p>Adopt any environmental and social (ES) instruments which may be required for activities under the CERC component of the Project, in accordance with the CERC Manual and, if applicable, CERC-ESMF and the ESSs, and thereafter implement the measures and actions required under said ES instruments, within the timeframes specified in said ES instruments.</p>	<p>The adoption of the CERC Manual in form and substance acceptable to the Association is a withdrawal condition under section III.B1(b) of Schedule 2 of the legal agreement for the Project.</p> <p>Adopt any required ES instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the ES instrument is required. Implement the ES instruments in accordance with their terms, throughout Project implementation.</p>	N/A at this stage
1.6	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>Ensure that the consultancies, studies, and reports, including ES planning documents, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the World Bank E&S standards (ESSs). IAs will seek retroactive finance for this expenditure and the World Bank will verify that these activities were carried out duly and in accordance with the terms of reference before disbursement.</p>	Throughout the implementation of the activities subject to retroactive financing	LGED, DPHE, RHD, and BPDB
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety management Plan (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Adopt and disclose the LMP before any project workers are hired (Including PIU workers), and thereafter implement it throughout Project Implementation.	LGED, DPHE, RHD, and BPDB
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	Contractors to establish and maintain; PIUs of LGED, DPHE, RHD, and BPDB to ensure it.

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3. Moreover, adopt an e-waste management plan for the solar energy (hybrid power plant) supply component.	Adopt the WMP prior to commencement of physical works, and thereafter implement the WMP throughout Project implementation.	LGED, DPHE, RHD, and BPDB
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and prevention and management measures in the ESMP to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP	LGED, DPHE, RHD, and BPDB
ESS 4: COMMUNITY HEALTH AND SAFETY.			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under ESMF.	Same timeframe as for the adoption and implementation of the ESMP. Throughout Project implementation.	LGED, DPHE, RHD, and BPDB
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, wastes, noise, air, and wastes water emission that may impact community health and safety behavior of Project workers, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the adoption and implementation of the ESMPs. Throughout Project implementation.	LGED, DPHE, RHD, and BPDB
4.3	SEA AND SH RISKS Adopt and implement a Gender and SEA/SH Action Plan, to assess and manage the risks of SEA and SH.	Adopt the Gender and SEA/SH Action Plan before any project workers are hired (Including PIU workers), and thereafter implement it throughout Project Implementation.	LGED, DPHE, RHD, and BPDB
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Prepare, adopt, and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	Adopt and disclose the RPF prior to commencement of site-specific screenings for any Project activity and thereafter implement it throughout Project implementation.	LGED, DPHE, RHD, and BPDB

5.2	RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, consistent with ESS5. The Project will not fund any activities that will require private land acquisition and resettlement/displacement.	Adopt, disclose, and implement the RAP, as relevant, before the commencement of any civil works (or before any negative impact associated with it takes place) for Project related activities that according to site-specific screening warrants the use of a RAP, and thereafter throughout Project implementation.	LGED, DPHE, RHD, and BPDB as applicable
5.3	GRIEVANCE MECHANISM Adopt the Project GRM to address land related grievances	As per Project GRM under ESS10	LGED, DPHE, RHD, and BPDB as applicable
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Screen and assess biodiversity related risks and impacts as part of the ESMF, strictly following the exclusion criteria and incorporate management measures into the ESMF.	Same timeframe as for the adoption and implementation of the ESMP. Throughout Project implementation.	LGED, DPHE, RHD, and BPDB
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	SMALL ETHNIC COMMUNITY PLANNING FRAMEWORK Adopt and implement a Small Ethnic Community Planning Framework (SECPF) for the Project, consistent with ESS7.	Adopt and disclose the SECPF before commencement of site-specific screening for any Project activity and thereafter implement it throughout Project implementation.	LGED, DPHE, RHD, and BPDB
7.2	SMALL ETHNIC COMMUNITY PLAN Adopt and implement a Small Ethnic Community Plan (SECP) for each activity under the Project for which a SECP is required as set out in the SECPF. If beneficiaries belonging to SECs are identified in the Project intervention areas, they will be consulted in a culturally appropriate manner, and all Project related information will be made accessible to them, so that they can understand and benefit from the Project. Any situation that may require obtaining Free, Prior, Informed Consent (FPIC) should not be considered for financing and will be included as part of the exclusion criteria.	Adopt the SECP, as relevant, before launching the bidding process for the respective Project activity and prior to the carrying out of the Project activity that requires the adoption of such SECP. Once adopted, implement the respective SECP throughout sub-Project implementation.	LGED, DPHE, RHD, and BPDB as applicable
7.3	GRIEVANCE MECHANISM Adopt the project grievance mechanism to address issues of the SECs.	Before the commencement of any physical work at the relevant sites. As per project GRM described under ESS10	LGED, DPHE, RHD, and BPDB, as applicable

ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS Describe and implement the chance finds procedures in the ESMF and include it as part of Bid Document	Describe the chance find procedures in the ESMF and include the same in Bid Documents	LGED, DPHE, RHD, and BPDB
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not Relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.	Adopt and disclose the SEP by Appraisal and thereafter implement the SEP throughout the Project implementation.	LGED, DPHE, RHD, and BPDB
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. Each PIU will maintain its own Project GRM (with Grievance Redress Committees (GRCs) at local (Upazillas where the IA is active), PIU, and Steering Committee levels). The Project GRM will also be adopted for land related issues (under RAPs) and issues raised by SECs (ESS7). The Project GRM shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner. The GRM for Project workers will be established as per the LMP and ESS2.	Establish the Project GRM (as per ESS10) before the commencement of any Project activity and thereafter implement throughout Project Implementation. Ensure the establishment of the Project Workers GRM before any Project workers are engaged.	LGED, DPHE, RHD, and BPDB
CAPACITY SUPPORT			
CS1	Develop and provide following types of capacity assessment/training to the relevant target groups, such as PIU staff, stakeholder community, project workers, consultants, contractors, grievance redressal committee (GRC) members etc.: <ul style="list-style-type: none"> • Introduction to World Bank ESF • Labor and working conditions including OHS. 	Develop and provide capacity development measures beginning from two month of effectiveness and continue throughout the Project	LGED, DPHE, RHD, and BPDB

	<ul style="list-style-type: none"> • Community health and safety • Stakeholder Engagement • Preparation of ESMF, ESMP, Screening mechanism • ES compliance monitoring and audit • Incident reporting ESIRT • SEA/SH and mitigation measures • Bid document and ES issues including Code of Conduct • Communication with SECs and preparation of SECPF/SECP • Preparation of RPF and RAP • GRMs • Waste Management and efficient use of resources 		
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