

The People's Republic of Bangladesh

Ministry of Youth and Sports (MoYS) Department of Youth Development (DYD)

Economic Acceleration and Resilience for NEET Youth (EARN) (P178077)

NEGOTIATED
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
(ESCP)

MAY 24, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- 1. The People's Republic of Bangladesh (the Recipient) will implement the Economic Acceleration and Resilience for NEET Youth (EARN) Project (the Project) with the involvement of the Ministry of Youth and Sports (MoYS) represented by the Department of Youth Development (DYD), as set out in the Financing Agreement. The International Development Association (the Association), has agreed to provide financing (P178077) for the Project, as set out in the referred agreement.
- 2. The DYD 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 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 agreement.
- 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 (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESSs, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S 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 DYD and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient Director General of DYD. The Recipient shall promptly disclose the updated ESCP.

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
MONIT	ORING AND REPORTING		
Α	REGULAR REPORTING		
	Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (EHS) performance of the Project, including but not limited to the (i) implementation of the ESCP, (ii) status of preparation and implementation of E&S instruments required under the ESCP, (iii) stakeholder engagement activities, (iv) functioning of the grievance mechanisms, (v) social inclusion activities, (vi) management of the risks and incidents of sexual exploitation and abuse (SEA) and sexual harassment (SH) at work places as well as training activities for E&S capacity development and improvement, and (vii) experience covering difficulties and lessons for management improvement and recommendations.	Submit quarterly E&S monitoring report within 21 days after the last day of each period throughout the Project implementation in conjunction with the project progress reports. Submit each report to the Association no later than [xx] days after the end of each reporting period.	PMU of DYD with inputs from LGED, BoU and other partner organizations and service providers
В	INCIDENTS AND ACCIDENTS		
	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 SEA, SH, and accidents that result in death, serious or multiple injury, fire at training venues or job fairs, concerns of occupational health and safety (OHS), community health and safety (CHS) and COVID-19 infections, serious mismanagement in handling waste, security breach, and the like. 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, partner organizations, and service providers, as appropriate. Subsequently, as per the request of the Association, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.	Notify the Association no later than 48 hours after learning about the incident or accident. A report would be provided within a timeframe agreed with the Association. Provide a subsequent report to the Association within a timeframe acceptable to the Association.	PMU of DYD with inputs from LGED, BoU and other partner organizations/service providers as applicable
С	CONTRACTORS' MONTHLY REPORTS		
	Require contractors, service providers 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.	Submit the monthly reports to the Association. The first report will be submitted 30 calendar days after the Contractor's mobilization at the site.	Contractors, Service Providers, PMU (DYD), LGED
D	NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS		

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	The Association will be notified of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor's/service provider's obligations to prevent and respond to sexual exploitation, and abuse (SEA), and/or sexual harassment (SH) specified in the respective works/service contract with such contractor/service provider; and, in the event of any such referral, notify the Association of (i) the DAAB's decision on such referral; (ii) the contractor's/service provider's Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB's decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.	No later than 07 calendar days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, a notice of commencement of emergency / full arbitration, emergency/full arbitration order, as applicable).	PMU (DYD), LGED
	ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
1.1	Establish and maintain a Project Management Unit (PMU) within DYD and under it an Environmental, Social and Gender Cell (ESG Cell), with qualified staff and resources to support management of ESHS risks and impacts of the Project including an Environmental Specialist, a Social Development Specialist, a Communications and Participation Specialist and a Gender and SEA/SH Management Specialist.	Establish and maintain the PMU as set out in the Financing Agreement. Recruitment of 1 Environmental Specialist, 1 Social Development Specialist, 1 Communication and Participation Specialist and 1 Gender and SEA/SH Management Specialist at the PMU/DYD, within 3 months from the signing of Financing Agreement.	PMU (DYD)
	Establish and maintain a Project Implementation Unit (PIU) within LGED and engage qualified staff and resources to support managing E&S risks and impacts associated with the project civil works for construction and rehabilitation of DYD premises and training facilities.	Recruitment of 1 Environmental Specialist and 1 Social Specialists prior to commencing civil works.	LGED
	The contractors and service providers will engage necessary E&S staffs as indicated in the bidding/procurement documents	Prior to commencing civil works by contractors and to training and education programs by service providers.	Contractors, Service Providers
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS		

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement Environmental and Social Management Framework (ESMF) including a generic Environmental and Social Management Plan (ESMP) for the project, consistent with the relevant ESSs.	The ESMF has been prepared prior to Appraisal. This ESMF will guide E&S management throughout Project implementation.	PMU, DYD
	Adopt and implement Project Operations Manual (POM), that includes detailed provisions for the relevant E&S risk management measures consistent with the relevant ESSs.	Prior to start of the Project Activities	PMU, DYD
	Adopt and implement additional E&S impact assessment (ESIA) and corresponding site-specific ESMPs as set out in the project ESMF, to identify and assess E&S risks and impacts of project interventions also covering gender and social inclusion for development benefits, risks of SEA/SH and appropriate mitigation measures.	Conduct E&S screening at the identification of subproject locations and adopt and implement ESIA at detail design of subprojects prior to bidding and updated within 30 days of any change.	PMU, DYD and PIU, LGED
	Prepare, disclose, adopt, and implement site specific ESMPs along with waste management plan, OHS plan, CHS plan, protocols for COVID-19 and other communicable diseases, and traffic management plan as part of the ESMPs, as applicable and in a manner acceptable to the Association. Any activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.	Adopt site-specific ESMPs before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.	PMU, DYD and PIU, LGED
1.3	MANAGEMENT OF CONTRACTORS		
	Incorporate the relevant aspects of the ESCP, including inter alia, the relevant E&S instruments and/or plans, the Labor Management Procedures, and Environmental and Social Code of Practices (ESCOPs) into the ESHS specifications of the procurement documents, with contractors, service providers and supervising firms. Thereafter ensure that the contractors, service providers and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts and service providers.	As part of the preparation of bidding documents and prior to invitation of bids of the respective works package. Supervise contractors and service providers throughout the Project implementation	PIU, LGED and PMU DYD
	Bidding documents, ToRs, contracts, to include relevant measures in the ESMP.	During Bid document and ToR preparation	PIU, LGED
	Prepare and adopt and implement Contractor's Environmental and Social Management Plan (C-ESMP). This may include, as relevant: Occupational Health and Safety Plan, Water	During inception and throughout the implementation	Contractors

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	and Waste Management Plan, Traffic Management and Road Safety Management Plan, Labor Influx Management Plan, Workers Camp Management Plan, Borrow Area		
	Management Plan, Material Sourcing Plan and Site		
	Restoration Plan and Community Health and Safety Plan.		
1.4	TECHNICAL ASSISTANCE	Throughout Project implementation.	PMU
	Ensure that the consultancies, capacity building, training, curriculum development, teaching/ learning materials and any other technical assistance activities 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.		
1.5	CONTINGENT EMERGENCY RESPONSE FINANCING		
	a) Ensure that the CERC Manual following the Emergency Action Plan (EAP) includes a description of the ESHS assessment and management arrangements, including ESMF Addendum for the implementation of CERC in accordance with the ESSs.	During the preparation of the CERC Manual	PMU
	b) Adopt any environmental and social (E&S) instruments which may be required for activities under CERC of the Project, in accordance with the CERC Manual and CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.		
ESS 2:	LABOR AND WORKING CONDITIONS		
2.1	LABOR MANAGEMENT PROCEDURES		
	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 (including personal protective equipment [PPE], and emergency preparedness and response), Code of Conduct (including relating to GBV/SEA/SH to be set out in the SEA/SH Action Plan), forced labor, child labor, grievance redress arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	LMP has been prepared prior to appraisal, and thereafter the LMP will be implemented throughout Project implementation. ESMPs will cover labor management procedures during implementation.	PMU, DYD and LGED
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS		
		Workers GRM will be established within the first (1st) quarter of implementation	PMU, DYD and PIU, LGED

MATER	IIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	Establish and operate a grievance redress mechanism (GRM) for Project workers, as described in the LMP and consistent with ESS2. The GRM should also be designed to address labor-related SEA/SH issues including provision of a referral system.	and, thereafter, maintain and operate throughout Project implementation.	
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 and e-Waste consistent with ESS3. The specific WMP will be integrated in the site specific ESMP with other sub-management plans.	Adopted within the first (1st) quarter from the signing of the Financing Agreement and maintained throughout Project implementation.	PMU, DYD and PIU, LGED
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the site specific ESMP to be prepared under the project.	Same timeframe as for the adoption and implementation of the site-specific ESMPs.	PMU, DYD and PIU, LGED
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 Site specific ESMP to be prepared under Action 1.2 above. Before the implementation of the project, the Contractor to make these plans site specific in site-specific C-ESMP to be prepared under Action 1.3. These are then reviewed by PMU consultants and their effectiveness monitored during physical construction works.	Prepare and implement traffic and road safety management plans in the same timeframe as for the adoption and implementation of the site-specific ESMPs. Monitor implementation throughout the Project timeline.	PMU, PIU and Contractors
4.2	COMMUNITY HEALTH AND SAFETY Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from project activities, including, inter alia, workers behavior, risks of labor influx, risks of SEA/SH incidents, emergency situations, infectious diseases including COVID-19, and include these measures in the site-specific ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the adoption and implementation of the site-specific ESMPs.	PMU-DYD, PIU-LGED and Contractors, Supervising Consultants, service provider organizations.
	SEA AND SH RISKS		

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement a SEA/SH Action Plan to assess and manage the risks of SEA/SH.	Adopt the SEA/SH Action Plan no later than 30 days of the signing of the Financial Agreement, and thereafter implement throughout Project implementation.	PMU DYD,
ESS 5	LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		
5.1		Not Relevant	
ESS 6: 1	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RE	SOURCES	
6.1	Implement screening criteria for sub-projects having any impacts on local natural habitats including tree falling in accordance with the ESMF	During sub-project implementation	PMU, DYD and PIU, LGED
ESS7:	INDIGENOUS PEOPLE		
7.1	Prepare, adopt, and implement an Indigenous Peoples Planning Framework/ Social Inclusion and Management Framework (SIMF) consistent with the requirements of the ESS7 requirements and guidelines on disadvantaged and vulnerable groups and individuals in response to the ESMF requirements, in a manner and standard acceptable to the Association.	Prepare, adopt, and implement the IPPF/SIMF prior to Project appraisal, and thereafter implement the IPPF/SIMF throughout Project implementation.	PMU, DYD and PIU, LGED
7.2	Adopt and implement an Indigenous Peoples Plan (IPP) for each activity under the Project for which the IPPF/SIMF requires such IPP, as set out in the IPPF, and consistent with ESS7.	Adopt the IPP prior to the carrying out of any activity that requires the preparation of such IPP. Once adopted, implement the respective IPP throughout Project implementation.	PMU, DYD and PIU, LGED
7.3	Prepare, adopt, and implement the arrangements for the grievance mechanism for small ethnic communities with indigenous status as per ESS7, as required under the ESMF and further describe such arrangements in the respective SIMPs.	Project GRM with provisions inclusive of small ethnic communities, where involved and operate throughout Project implementation.	PMU, DYD and PIU, LGED
ESS 8:	ESS 8: CULTURAL HERITAGE		
8.1	CHANCE FINDS	Describe the chance finds procedure in	

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	Describe and implment the chance finds procedure, as part of the ESMF, and generic ESMP.	the ESMF and generic ESMP. Implement the procedures throughout Project implementation.	
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	Prior to Appraisal and thereafter	PMU-DYD, PIU-LGED and
	with ESS10, which shall include 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.	implement throughout Project implementation.	other service provider organizations
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.	Establish and notification of the grievance mechanism within 90 (ninety) calendar days of signing the Financing Agreement and thereafter maintain and operate the mechanism throughout Project implementation.	PMU, DYD
	The grievance mechanism 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 Guideline and Handouts for public disclosure and stakeholders education will be developed, printed and circulated within 90 days of singing of	
	The Centralized GRS of the Government of Bangladesh, mandatory for all government organizations will be interlinked with the Project GRM through wider publicity and adopting a GRM Guideline and Handout in local language.	Financing Agreement and the campaign will continue throughout the project implementation period.	
CAPAC	ITY SUPPORT		
Staff and consultants engaged with DYD, LGED and the service provider organizations under the project will be given capacity building training and orientation on assessment and management of E&S risks and impacts, and ESHS issues following the national legal and policy requirements, international treaties and the World Bank ESF, with support of E&S specialists with the PMU and PIU. DYD and where applicable LGED will design and implement training for targeted groups involved in the Project to improve their awareness of E&S risks and mitigate the impacts. This ESCP proposes a preliminary training plan that can be adapted to meet needs during Project implementation.			
CS1	Based on E&S Capacity Assessment, following types of training (3 days long) will be provided to the relevant target groups, such as PMU staff, key stakeholders, direct		
	workers, and consultants:	During project implementation	E&S Specialists with the

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	 Introduction to E&S Standards of the World Bank ESF 		PMU-DYD and PIU-LGED
	 Labor and working conditions, OHS, and Labor management audit 		
	Stakeholder Engagement		
	Grievance Management		
	 Environmental and social assessment and social inclusion 		
	Preparation of ESMP		
	 ESF/ESS compliance monitoring and audit 		
	Gender and development		
	Community Health and Safety		
	SEA/SH Risk Management		
	Chance finds procedure		
CS2	Three days long training and day-long orientation for contractors, sub-contractors,		
	contracted workers, project affected persons, etc.	During project implementation	
	 Occupational and community health and safety 		E&S Specialists with the
	 SEA/SH and Code of conduct 		PMU-DYD and PIU-LGED
	 Grievance management, including labor and SEA/SH GRM 		
	 Compensation payment and land ownership/entitlements 		
	Gender and development		
	Community Health and Safety		
	SEA/SH Risk Management		