

**BANGLADESH ENVIRONMENTAL SUSTAINABILITY AND
TRANSFORMATION PROJECT (BEST) (P172817)**

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

People's Republic of Bangladesh

January 2022



ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The People's Republic of Bangladesh is planning to implement the Bangladesh Environmental Sustainability and Transformation Project (BEST) (the **Project**), with the involvement of the Ministry of Environment, Forest and Climate Change (MoEFCC), (Department of Environment (DoE)), and other Implementing Agencies (IAs)—Bangladesh Road Transport Authority (BRTA), Bangladesh Bank (BB) and Bangladesh Hi-Tech Park Authority (BHTPA). The International Development Association (Association) has agreed to provide financing for the Project.
2. The People's Republic of Bangladesh will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**) of the World Bank Environmental Social Framework (**ESF**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, specific documents or plans, as well as their timing.
3. The People's Republic of Bangladesh through the DoE, BRTA, BB and BHTPA will also comply with the provisions of all Environmental and Social (E&S) documents required under the World Bank ESF and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Stakeholder Engagement Plan (SEP), Small Ethnic Community Development Planning Framework (SECDPF), Labor Management Procedures (LMP), Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plans (ESMP), Resettlement Action Plans (RAP), Small Ethnic Community Development Plans (SECDP), and Bank of Bangladesh Environmental and Social Management System (ESMS) the timelines specified in those E&S documents.
4. The People's Republic of Bangladesh is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions are conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by The People's Republic of Bangladesh through DoE, BRTA, BB and BHTPA and consolidated by the Project Coordination and Monitoring Unit (PCMU) as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the People's Republic of Bangladesh, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the People's Republic of Bangladesh will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the People's Republic of Bangladesh. The Implementing Agencies will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, Project performance result in changes to the risks and impacts during Project implementation, the People's Republic of Bangladesh shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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 and status of preparation and implementation of ES documents.</p>	<p>Every six-months during the Project</p> <p>No later than 45 days after the last day of each period.</p>	<p>MoEFCC/ Project Coordination and Monitoring Unit (PCMU)</p> <p>PIUs of the 4 Implementing Agencies (DoE BRTA, BB and BHTPA) will provide reports to PCMU who would consolidate all reports in one and send to WB</p>
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 accidents that could result in fatalities, injuries, and incidents of Gender Based Violence/Sexual Exploitation and Abuse/ Sexual Harassment (GBV/SEA/SH), concerns of COVID-19 infections, serious mismanagement in handling waste, security breach, etc., provide sufficient details regarding 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 supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Initially notify the Association within 24 hours of learning of the incident or accident. A detailed report will be provided within 96 hours including classification of incident. Carryout Root Cause Analysis (RCA) within 10 (ten) calendar days of the incidence. Develop Safeguard Corrective Action Plan (SCAP) and after approval from WB implement the same.</p>	<p>PCMU upon receipt of notification from IAs.</p> <p>PIUs of the 4 Implementing Agencies (DoE BRTA, BB and BHTPA)</p>
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Prepare and submit consolidated quarterly progress reports based on the contractors' monthly reports</p>	<p>The first week of each quarter for the preceding quarter</p>	<p>PIUs of the 4 Implementing Agencies (DoE BRTA, BB and BHTPA) will provide the reports after communicating with their respective contractors to PCMU to send one consolidated report to WB</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p>		



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>Establish Project Implementation Units (PIUs), under each Implementing Agency (DoE, BB, BRTA and BHTPA). All four PIUs will have their own Environmental Specialist, Social Development Specialist. The Social Specialists must have Gender and related experience.</p> <p>PMC, DSC, Operators of Municipal and E-Waste Facilities and Vehicle Inspection Centers (VICs) and other Contractors will recruit their own Environmental, Health, and Safety Specialist (EHSS).</p>	<p>Recruitment process of the Specialists for PIUs will be completed within 2 months from Project effectiveness. PIUs will designate own staff in the interim period to administer and address ES issues.</p> <p>Contractors and operators of Vehicle Inspection Centers (VICs), E-waste management facility and Municipal waste management entities will deploy required number of Environmental, Health, and Safety Specialist (EHSS) as stated in the contract within 1 months of the contract award by the respective PIUs.</p>	<p>PIUs of the 4 Implementing Agencies (DoE BRTA, BB and BHTPA)</p> <p>Contractors and respective waste management facility and VICs operators (respective PIUs shall ensure)</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Carry out subproject screening and thereafter site-specific ES assessment (if deemed essential from screening results) and ES Management Plan (ESMP) in accordance with applicable national legal framework, the World Bank ESF and ES standards reflected in the project ESMF, to identify and assess environmental and social risks and impacts of project interventions including vulnerability to access development benefits, risks of GBV/SEA/SH and appropriate mitigation measures.</p> <p>Prepare, disclose, adopt, and implement site-specific ESIA and ESMPs (if warranted from screening results) required for the Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSGs and relevant national and WHO Guidelines on COVID-19 response, in a manner acceptable to the Association.</p> <p>Update and redisclose ESMF on Environmental Fund (endowment) activities</p>	<p>ES screening at the identification of subproject and if warranted from screening results the ESIA/ES assessment of subprojects will be done prior to bidding and updated within 30 days of any change.</p> <p>Before the carrying out of the relevant Project activities, and thereafter during carrying out of such activities.</p> <p>Within 30 days of finalization of Environment Fund (relevant GO issued) is done during project implementation.</p>	PCMU and PIUs



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>Update/prepare supplementary ESMF and re-disclose/discard the updated/supplementary ESMF upon activation of the Contingent Emergency Response Component (CERC), including adding a positive list of eligible activities/ expenditures at the time of CERC activation, if new activities under CERC are not covered by existing ESMF.</p> <p>Technical Assistance: Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project, including with respect to the proposed regulatory reforms under sub-component 1.1, are carried out in accordance with terms of reference acceptable to the Association, that incorporate the relevant requirements of the ESSs.</p>	<p>Within 90 days from CERC activation</p> <p>Throughout the Project</p>	
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Screen any proposed subproject in accordance with the ESMF prepared for the Project, and, thereafter, depending on the Screening outcome, prepare, adopt, disclose and implement the subproject specific ESIA along with ESMP, with Waste Management Plan (including e-waste management), OHS Plan, Community Health and Safety Plan, Laboratory Safety Protocol and COVID-19 SOP as part of the ESMPs.</p>	<p>During detailed design and before bidding process of the respective subproject.</p>	<p>PIUs and Contractors</p>
1.4	<p>MANAGEMENT OF CONTRACTORS AND OPERATORS OF MUNICIPAL WASTE MANAGEMENT FACILITY, E-WASTE AND MUNICIPAL MANAGEMENT FACILITY VEHICLE INSPECTION CENTERS (VICs)</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant ES documents and/or plans, and the LMP, into the Environmental, Social, Health and Safety (ESHS) specifications of the respective procurement documents. Bidding documents and works contracts will include relevant measures for labor management, workers Codes of Conduct (CoC) to ensure gender inclusion and management of risk of GBV/SEA/SH, incorporate relevant national and WHO Guidelines on COVID-19 response and other communicable diseases risks with</p>	<p>During Bid document preparation and Prior to invitation of bid of the respective subproject.</p>	<p>PIUs</p>



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>respect to workers and surrounding communities, OHS issues and incidence management and reporting particulars.</p> <p>Preparation of Contractors and facility operators-ESMP (including a Labor Management Plan with OHS, Safety Management Plan, Emergency Protocols, Facility Operation SOP, Traffic Management Plan, Waste Management Plan, as appropriate) and other plans as described in 1.3 relevant for contractors.</p>	Prior to commencement of civil works and operation of waste management and VIC facilities	Contractor, Operators of facilities and VICs and respective PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES: Implement Project in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate OHS measures (including COVID-19 response measures), provision of training on handling emergency situation especially health related issues and accidents, provision of Code of Conduct signing and GBV/SEA/SH training by all workers; and setting out grievance arrangements for project workers, and incorporating labor requirements in the procurement documents and contracts with contractors and consultants. Ensure that child labor (any person under the age of 18), forced labor and trafficked persons are not employed under works contracts.</p> <p>Prepare and implement the Labor Management Procedures (LMP) including the labor related GRM</p>	<p>Will be implemented throughout Project implementation.</p> <p>Prior the Project appraisal and implemented throughout project implementation</p>	PIUs
2.2	<p>GRIEVANCE REDRESS MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, 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 GBV/SEA/SH issues including provision of a referral system. Other</p>	GRM for the workers will be established for every works package before commencement of civil works and it will remain operational throughout works contract implementation.	PIUs and Contractors



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	than GRM at works site, responsive system will be in place at the PCMU and all PIUs.		
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures including health protocol in response to the COVID-19 and other communicable diseases as specified in the LMP and ESMP.</p>	Before commencement of civil works and remain operational throughout works contract implementation and during operations of completed facilities.	PIUs, Contractors, Operators of Municipal and e-waste facilities and VICs
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Carryout screening of subproject and depending upon screening results develop and implement site specific ESIA's along with the ESMPs and specific Waste Management Plan that will include resource efficiency guidelines, pollution prevention measures and take initiative to reduce, reuse or recycle waste material to the extent possible. Wastes generated in the sanitary systems and e-wastes management center to be disposed in a manner that does not harm the environment and human health and in an environmentally safe manner. For any infrastructure repair/rehab/construction works, the energy/water efficiency measures detailed in ESS 3 will be taken into consideration in the ESMPs.</p> <p>Standard Operation Protocol (SOP) will be prepared for the operation of the proposed Laboratories by DoE.</p>	<p>The site specific ESMPs and Waste Management Plans to address the issues of resource efficiency and pollution prevention respectively to be developed as soon as project specific locations are known and before commencement of civil works and remain operational throughout works contract implementation.</p> <p>SOP/Lab Safety Protocol will be prepared before operation of the Laboratories.</p>	<p>PIUs</p> <p>DoE/PIU</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action 1.3 above. Contractors will develop Traffic Management Plans, and this will be binding in Contract document.</p>	Before commencement of civil works and remain operational throughout works contract implementation.	PIUs and Contractors.



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.2	<p>COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from subproject activities, including, inter alia, workers behavior, risks of labor influx, risks of GBV/SEA/SH incidents, emergency situations, infectious diseases including COVID-19, incidence due to use of services and include these measures in the ESMPs to be prepared in accordance with the ESMF, and national and WHO guidelines of social distancing and other measures in a manner acceptable to the Association. Though GBV/SEA/SH risk is Low, the risk will be mitigated through PIU sensitization, awareness raising of communities, mapping of GBV/SEA/SH service provider, worker training and signing of Code of Conduct and establishment of GRM designed to address GBV/SEA/SH issues.</p> <p>Response measures are included in the SEP along with a Grievance Redress Mechanism (GRM) under SEP as well as a labor related GRM under LMP. Project GRM will also manage the risks of GBV/SEA/SH and those related to small ethnic communities.</p>	Throughout Project implementation (including all required updates to the documents).	PIUs
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>Prepare, disclose and implement Resettlement Policy Framework (RPF).</p> <p>Prepare, disclose and implement Resettlement Action Plan (RAP) or Abbreviated Resettlement Action Plan (ARAP) for each activity where land acquisition will be required, and/or displacement of informal settlers will occur and/or physical and economic displacement will take place (the ARAPs can be in the form of a specific section of the relevant ESMPs rather than free-standing documents if impact is minimal)</p>	<p>RPF prepared and disclosed Appraisal and will be implemented throughout project implementation</p> <p>RAP/A-RAP will be prepared prior to the commencement of any works for land acquisition and/or where physical and economic displacement will occur and/or informal settlers will be impacted.</p>	PIUs



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>Not Relevant. The project is not likely to affect any biodiversity, habitat or living natural resources given locations of subprojects in industrial built-up areas and urban and peri-urban areas. Subprojects with significant adverse impacts on biodiversity will be excluded from project financing.</p>	NA	
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>SMALL ETHNIC COMMUNITY DEVELOPMENT PLAN:</p> <p>Prepare, disclose and Implement Small Ethnic Community Development Planning Framework (SECDPF)</p> <p>Prepare, disclose and Implement Small Ethnic Community Development Plan (SECDP) by carrying out due diligence for inclusion of the targeted beneficiaries for each subproject/activity, where needed. The Project will exclude any activities that will require Free, Prior, Informed Consent (FPIC) from the SECs.</p>	<p>Prior to Project appraisal and implemented throughout project implementation</p> <p>Prior to start of activity that has potential impacts (positive and negative) on the small ethnic communities and as per the guidance of SECDPF</p>	PIUs
ESS 8: CULTURAL HERITAGE.			
8.1	<p>CHANCE FINDS PROCEDURE:</p> <p>Prepare and implement chance finds procedure described in the ESMF and include as a requirement in ESIA/ESMP and also in the bid documents for civil works</p>	During preparation of bid documents and prior to the commencement of civil works	PIUs
ESS 9: FINANCIAL INTERMEDIARIES			



MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>9.1 Conduct due diligence review of Bangladesh Bank's 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 and provide recommendations to develop gap filling measures to address risks and impacts for interventions undertaken by BB and other FIs. The following recommendations are made to fill the gap of BB ESRM:</p> <ul style="list-style-type: none"> • The ES policy should be periodically updated, endorsed by the BB's senior management that will reflect lessons learnt from project interventions in the field • Set up a permanent ES unit with Environmental and Social Experts under its organogram • The consideration for a Training Policy, assessment of competence and training modules development. • Development of OHS measure as per Good International Industry Practices (GIIP) • Procedure for assessment and identification of various stakeholders (including disadvantaged and vulnerable) • Communication procedure with various stakeholders including meaningful consultation (keeping in mind differentiated measures for the disadvantaged), and consideration for their input for project design (completion of feedback loop) • Designation of a representative of the senior management to have overall accountability for environmental and social performance of the subprojects <p>Implementation of the strengthened ESMS by the BB and PFIs as per recommendations above</p>	<p>Prior the Project appraisal and maintained throughout project implementation</p> <p>Bangladesh Bank will update and disclose updated ESMS before carrying out of the relevant Sub-Project activities. The specifics of ESMS will be maintained throughout project implementation.</p>	<p>PCMU and PIU of BB</p> <p>BB and PFIs</p>



ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Develop, implement and monitor the Stakeholder Engagement Plan (SEP), including project level GRM. The SEP may be amended anytime during implementation in agreement with the Association and it will be updated and redisclosed to address periodically to address recent and upcoming issues necessitating consultation with the stakeholder and closing the feedback loop.</p>	<p>The project SEP will be developed and disclosed before appraisal.</p>	<p>PCMU and all PIUs</p>
10.2	<p>PROJECT GRIEVANCE REDRESS MECHANISM (GRM)</p> <p>Prepare, adopt, maintain, and operate a GRM, as described in the SEP, which should be able to address GBV/SEA/SH related complaints and small ethnic community grievances.</p>	<p><u>Within 2 months of project effectiveness</u> and updated from time to time as needed and maintained throughout project implementation.</p>	<p>PCMU and all PIUs</p>



CAPACITY SUPPORT (TRAINING)			
<p>All staff of the PCMU and PIUs, Contractors and Operators of facilities and VICs will be given capacity building training and orientation on environmental, social, health and safety (ESHS) management following the national legal and policy requirements, international treaties, WHO guidelines and the World Bank ESF, with support of PIU E&S specialists. PIUs will design and implement training for targeted groups involved in the project to improve their awareness of risks and mitigate the impacts. This ESCP proposes a preliminary training plan that can be adapted to meet needs during Project implementation according to the approved training plan and budget by the Association.</p>			
	<p>Based on E&S Capacity Assessment (under ESMF) following types of training will be provided to the relevant target groups, such as PIU staff, stakeholder community, project workers, consultants, contractors and sub-contractors, operators of e-waste and municipal waste management facilities and VICs:</p> <ol style="list-style-type: none"> 1. Introduction to World Bank ESF guidelines and ESMF 2. Screening and preparation of ESIA under ESMF 3. Preparation of RAP and SECDP 4. Labor and working conditions 5. GBV and SEA/SH risk in the project and its implementation, need to understand and sign Code of Conduct 6. Occupational Health & Safety 7. Community health and safety 8. Stakeholder Engagement 9. Environmental compliance monitoring and audit 10. Issues related to COVID-19: use of PPE; working in COVID-19 environment; WHO, CDC and national guidelines on quarantine; compliance with local rules and regulations. 11. ESMS implementation by BB and PFIs 12. Efficient use of resources and prevention of pollution 13. Emergency procedure and response 14. SOPs of VIC, waste management and laboratory facilities including ES issues management 	<p>Training of PCMU and PIU staffs to be completed within 6 months of Effectiveness and thereafter yearly once.</p> <p>Staffs at PFIs of BB, Contractors, Operators of facilities and VICs will be trained within two months of Contract signing. PIUs will select training modules from the list of previous columns as appropriate.</p>	<p>PIUs E&S Specialists, M&E Specialist</p>