



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
South Asia	SOUTH ASIA	P168961	
Project Name	Higher Education Acceleration and Transformation Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	11/29/2020	3/15/2021
Borrower(s)	Implementing Agency(ies)		
The People's Republic of Bangladesh, Islamic Republic of Afghanistan	Ministry of Education Bangladesh, Ministry of Higher Education		

Proposed Development Objective

The PDOs are (i) regionally, to strengthen the COVID-19 response in higher education, improve connectivity and quality of higher education for women, and (ii) in Bangladesh, to enhance higher education’s governance, resilience to emergencies, and graduate employability.

Financing (in USD Million)	Amount
Total Project Cost	509.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed project is expected to be implemented over a five-year period from 2021 to 2025/26. The project will be financed through Investment Project Financing (IPF). The project consists of three components. Component 1 is a regional component supporting collaboration in higher education across the South Asia region Component 2 supports the Bangladesh higher education sector through a nationally focused component. Finally, Component 3 support the day to day management of the proposed operation and the ‘zero budget’ contingent emergency response component. The summary of the components are given below.



COMPONENT 1: SOUTH-ASIAN HARMONIOUS AREA FOR RESEARCH AND EDUCATION. This component focuses on formulating regional policy responses to address pandemic preparedness, system resilience through digitalization, and access to quality higher education for women. These include: building systemic resilience and digital connectivity to develop emergency responsive measures creating resilience in response to the COVID-19 pandemic in the higher education sector, as well as to prepare for future crises including climate-related events and violent conflict. The project will finance technical assistance for the development of broad, evidence-driven, guidance that can be used by institutional authorities to support business continuity during the ongoing pandemic. A central warehouse will be created which will act as a regional knowledge portal on emergency response. The guidelines will also help 150 colleges, institutions and universities with the establishment of suggested Emergency Response Committees, communications strategies, ensure that all students, staff, faculty and all relevant stakeholders are treated with fairness, dignity, and respect. The project will also establish a 24/7 helpdesk for faculty and students to provide online and telephone-based IT support to academic staff and students who have concerns about re-opening or require assistance regarding any element of the emergency response. The project will also be financed for (i) technical assistance to participating countries to strengthen the service provision offered by NREN, (ii) development of a standard package of services that NRENs in South Asia can offer students and higher education institutions (such as, a Learning Management System, video-conferencing, data storage, and note-taking solution); (iii) support the participation and membership of the AfgREN in the Asia-Pacific Advanced Network (APAN) and work closely with APAN to strengthen cooperation across SAR RENS; (iv) put in place the last-mile connectivity for participating colleges, institutions and universities in Afghanistan and Bangladesh; (v) support the development and implementation of policies and strategies to ensure connectivity of the most disadvantaged students by providing means-tested access to devices and broadband access.

Regional network of women’s higher education institutions - The project will support the establishment of a network of women’s universities, colleges and institutions with three main objectives: (i) enhancing access to quality women’s higher education, (ii) support the development of women leaders, and (iii) enhance female labor force participation. The network will also engage in joint learning activities on topics such as (i) strengthening student recruitment and admissions; (ii) remedial programs to ensure preparation for a competitive and rigorous program; (iii) strengthening of teaching and learning at all stages of student programs, (iv) improving employability and labor market outcomes; (vii) curricular reforms, (viii) improved methods of student assessments; (ix) enshrining civic and social values in student programs; (x) digital program development; and (xi) development of modules focused on women’s leadership. AUW will develop technical guidelines on each one of these areas based on the practice adopted to support their success. Institutions will have the option to create twinning arrangements with other institutions to implement the above activities, leading to spillovers across institutions. Of the set of network institutions, at least two will be developed into Centers of Excellence (COEs) in Afghanistan and Bangladesh respectively and two further COEs will be established in other participating countries. The project will support to develop a climate resilient academic center at Asian University for Women (AUW), which will act as a hub for the proposed regional network.

COMPONENT 2: TRANSFORMING HIGHER EDUCATION IN BANGLADESH. This component is focusing on enhancing resilience, graduate employability and improve governance of higher education. It is expected the Bangladesh higher education would be transformed through (i) business continuity under COVID-19, (ii) strengthening market relevance of programs, and (iii) improving the governance and quality of the higher education sector.



It would strengthen online learning capabilities through the upgrading BdREN infrastructure; develop National Learning Management Infrastructure to facilitate the development, management and delivery of on-line courses; subsidized connectivity and devices to students and staff. The quality enhancement of higher education programs would support enhancing employability skills of university students, with a particular focus on girls; strengthening continuous professional development of university faculty; promoting advanced research, innovation and entrepreneurship skills and efforts. Academic research and development would be supported through competitive grants for COVID-19 related research and development; improving infrastructure for teaching-learning; advanced research grants for two clusters of academic disciplines: STEM and Humanities/Social Sciences/Liberal Arts. Innovation support facilities will provide grants to establish new Fab-Labs, i-labs, business incubator/innovation centers to promote entrepreneurship among students and faculty. Technology Transfer Offices will be established at 20 universities. Technical assistance will be provided to support implementation of improving higher education management, enhanced quality assurance mechanisms, piloting performance based financing and strengthening of institutional and program accreditation.

COMPONENT 3: ENHANCING PROJECT MANAGEMENT, RESULTS MONITORING AND COMMUNICATION. This component will support project management capacity of Bangladesh: Ministry of Education (MoE) of Bangladesh and UGC; and Ministry of Higher Education of Afghanistan (MoHE) and beneficiary higher education institutions, and build results monitoring and evaluation capability of these institutions. The activities under this component include: (i) project management; (ii) monitoring and evaluation; (iii) communication; and (iv) Technical Assistance (TA). Under this component, the project will create a grievance redress mechanism (GRM), which covers all aspects of the project during implementation.

COMPONENT 4: CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC)

This CERC is included under the project for situations requiring urgent need for assistance with a zero allocation.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

There is a local and regional dimension to the project. In Bangladesh, there are two, substantial physical infrastructure activities proposed under the project (Subcomponents 1.2 .2 that supports the development of the Asian University for Women (AUW) Academic complex and sub-component 2.2 that supports the construction of the University Teacher’s Training Academy (UTTA) and a range of small-scale renovations and facility development works in universities to be selected as a part of the grant facility including construction of fab labs, i-labs etc).

The proposed new academic complex of AUW will be constructed in Chattogram. The project supported activities of the campus development include the construction of the main seminar rooms, lecture halls, theaters, and faculty offices. Three sides of the AUW campus (west, north and south) are surrounded by hilly terrain and there are some residential and commercial structures to the east of the boundary. Most of those structures are one storied and semi-pucca in nature. There are few multistoried buildings near the proposed new campus sites, commercial facilities are mainly along the road. There is no agricultural land close to the site but the terrain is mostly covered with grass, bushes and planted trees and is considered modified habitat. The approach road to the site is also already built and in use. The hills on the site are part of a chain that extends north-south parallel to the coast and ends at the present



urban Chattogram with Batalli hills (280 feet) and the Railway Cantonment station. The hills are formed of consolidated silt to hard shale, raised by geological fault action. The land (campus site) is vacant and in the possession of the University Authorities and owned by AUW. There is also a possibility that the construction works temporarily obstructing access to the villages from the main entry/exit points while works are underway, if the ESMP is not adequately implemented.

The location for the UTTA is yet to be determined. Two alternative land/sites in Dhaka, owned by the Government of Bangladesh have already been identified as potential sites for the construction of UTTA.

Under this project, Technology Transfer Offices (TTO) will be established at 20 universities. Also, teaching and learning facilities of women’s institutions will be improved through infrastructure upgrades (childcare facilities, dorms, washrooms). Similarly, in other selected institutions, there will be (a) upgradation of teaching-learning facilities with modern communication technology; (b) upgradation of science and technology labs for STEM disciplines; (c) updating/modernizing curricula and teaching-learning materials; and (d) upgradation/renovation of childcare facilities and ensuring campus safety for women. Furthermore, project grants will be available for: (a) establishing 7 new fab-labs; (b) transforming 5 fab-labs (from the existing 8) into Centers of Excellence in digital manufacturing; (c) setting-up 5 “i-labs” in 5 universities; and (d) setting-up business incubators tagged with successful fab-labs/i-labs to convert innovative ideas into commercially useful products. All these sub-projects will be screened as per the ESMF procedures and appropriate mitigation measures and ESMPs will be applied before commencement of works to avoid any adverse E&S impacts.

The project will also provide Competitive Research grants, with particular focus on gender studies, education and labor market, agriculture, computational biology, bio-medical sciences, nanotechnologies and engineering, sustainable materials, textile & leather technologies, climate change resilience, etc. The area of coverage of the universities is nationwide for Bangladesh. The sub-projects supported by these research grants will be screened for E&S impacts and appropriate mitigation measures to avoid any adverse impacts will be applied per E&S instruments governing the project.

Although civil works pertaining to the project will not take place in areas where there are concentrations of Indigenous Peoples, the project will encourage enrollment of indigenous students through various incentive mechanisms, including stipends. An Indigenous Peoples Planning framework for Bangladesh has been prepared.

In Afghanistan, the proposed project does not involve any civil works, as the proposed activities will only support scholarships, faculty professional development and digital exchange programs. The social safeguards risks rating of the Afghanistan activities is low to moderate. The Ministry of Higher Education (MoHE) will be required to engage a consultant to conduct stakeholder mapping and assessment and update the draft stakeholder engagement plan (SEP) prepared and disclosed prior to appraisal. Updating the standalone SEP is included as a commitment in the Environmental and Social Commitment Plan (ESCP) prepared for the project’s Afghanistan component.

D. 2. Borrower’s Institutional Capacity

In Bangladesh, the overall responsibility for the Project implementation would lie with the Secondary and Higher Education Division (SHED) of the Ministry of Education (MoE) while day-to-day implementation support will be provided by the University Grants Commission (UGC). The World Bank has invested heavily in the higher education development sector and has worked with the MoE on several projects. The MoE has dealt with environmental and



social safeguards issues adequately in the past. However, the ESF will be new for both from a substantive and procedural perspective. Significant coordination with several higher education institutions across the region also pose challenges in carrying out an operation of this magnitude and ensuring that environmental and social (E&S) issues, risks and impacts are properly mitigated.

Therefore there is substantial need for training, deployment of adequate relevant staff and resources from the client side, and sustained assistance from the Bank side. To mitigate the risks, the UGC and MoE will be adequately resourced with personnel and expertise on clearly-defined TORs and with considerable autonomy. The operation will also provide continuous support and training to assist the AUW and other national level universities in effectively implementing their activities supported under the Project and encourage promoting green initiatives. The organizational structure for ESF implementation will be as follows:

- MoE will recruit Chief Implementation Officer (CIO). The CIO will lead the Technical Assistance (TA) team. The CIO will be responsible for coordination of project activities under the guidance of PD.
- UGC will recruit five specialists for the implementation and monitoring of the ESCP, ESMF, ESIA, RPF, IPPF, SEP for all components. A full time senior Environmental Specialist (ES)- responsible for addressing environmental risks/impacts ESMPs as well as waste management issues and implementation of the mitigation measures,, a Senior Social Development Specialist (SDS)- responsible for implementation of RPF and IPPF, a Labor and OHS Specialist-responsible for implementation of LMP and monitoring and ensuring application of COVID-19 protocol of Ministry of Education (MoE) and World Health Organization (WHO) with qualifications, a Gender and GBV Specialist responsible for implementation of GBV and GAP, and a consultation and communication specialist– responsible for implementation of SEP under terms of reference satisfactory to the Bank.
- In addition to the above 5 specialists, UGC will hire 01 full time environmental specialist and 01 full time Social Development Specialist on behalf of AUW. They will be responsible to (i) update and implement AUW ESIA and ESMP, (ii)compliance of ESMF requirement in any activities implemented by AUW including the infrastructure
- UGC will hire an E&S firm for preparing the training material on ESF for the professional training.
- AUW will deploy 01 Gender and GBV specialist from the Gender department of AUW-responsible for implementing the GBV and Gender actions plans for the AUW related component/sub-components with the direct supervision of Gender and GBV specialist of the PIC. AUW Environment Department will work with the Environment Specialist hired by UGC for AUW, for the quality assurance of the implementation of the (AUW specific) ESMPs during construction.
- UGC will recruit 1 feasibility study team for UTTA and the feasibility study team will engage one social and one environmental specialist along with the other specialists mentioned above. Specialists will be responsible for preparing UTTA-ESIA, ESMP and RAP/ARAP if required. They will also be responsible for ensuring that ESMF compliance requirements are properly reflected in the feasibility studies.

The bid documents prepared by the UGC will be cleared by the World Bank ensuring the incorporation of the World Bank ESF requirements for the project.

In Afghanistan, the overall responsibility for the Project implementation would lie with the Ministry of Higher Education (MoHE) while day-to-day implementation support will be provided by the Operations and Monitoring Support team (OMST) under the on-going World Bank funded Project – Higher Education Development Project (HEDP). The MoHE has dealt with environmental and social safeguards issues adequately under HEDP. However, the ESF will be new to both of them from a substantive and procedural perspective.



Although the environmental and social (E&S) issues, risks and impacts are not very significant for the activities proposed in Afghanistan, significant coordination with higher education institutions across the region may pose challenges in carrying out the overall operation. There will therefore be a need for training, deployment of adequate relevant staff and resources from the client side, and sustained assistance from the Bank side. The OMST has a full time environmental and social specialist on board and they will be maintain during the HEAT project implementation period, to support the project and ensure full implementation of the project ESCP for Afghanistan.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

The environmental risk of the project is rated as “Substantial” considering the impacts from (i) construction of AUW academic complex which will involve construction on the hilly terrain, (ii) generation of extensive amounts of e-wastes over time, (iii) advanced research which may generate toxic / hazardous wastes that may be harmful to the environment and health of people and (iv) the limited experience of the implementing agencies to implement the E&S instruments to manage the overall risks and impacts. The major environmental risk will emanate from construction works related to the permanent AUW Campus. Construction related impacts can include: air, noise, dust and water pollution and the safety of workers and communities; disturbance to flora and fauna; improper disposal of waste materials, etc. An ESIA has been prepared for the AUW Campus with an ESMP. Appropriate management measures to address the impact from hill profiling during and beyond project period have been included as part of the Environmental and Social Management Plan. As the UTTA building site has not been finalized, an ESMF has been developed with necessary guidelines, screening forms and template for preparing ESMPs for UTTA and the rest of the project activities.

The impacts from the above mentioned activities can be mitigated with appropriate mitigation measures in place. The capacity of the implementing agencies’ to implement these mitigation measures will be enhanced through continued capacity building as agreed in the ESCP. This risk classification will be reviewed on a regular basis based on the performance of implementation and type of research grant supported by the project and would be changed (if necessary). Any change to the classification will be disclosed on the Bank’s and MoE, UGC and AUW websites.

As there are no physical works proposed for the Afghanistan component of the project, which will only support TA activities hence no significant environmental risks or impacts are anticipated at this stage.

Social Risk Rating

Substantial

The social risk of the project in Bangladesh is rated “Substantial” considering the impacts from (i) construction, upgrading and rehabilitation of buildings, and other infrastructures and facilities for UTTA, AUW, and other universities and colleges; (ii) occupational health & safety and community health and safety associated with the construction activities; (iii) potential increase in gender-based violence (GBV) due to labor influx and inherent risks of



SEA/SH in higher education institutes in Bangladesh and prevalence of GBV in Afghanistan; (iv) capacity of the implementing agencies to manage E&S risks; and (v) risks related to ongoing COVID-19 situation.

The AUW academic complex will be constructed on land owned by AUW. Two alternative land/sites in Dhaka, owned by the Government of Bangladesh have already been identified as potential sites for the construction of UTTA. Other infrastructural renovations and upgradation works for labs, ICT infrastructure, facilities in women’s colleges and universities will be carried out within the existing buildings and premises and no land acquisition, physical or economic displacement of people is expected.

There is possibility of short-term construction induced impacts on surrounding communities during the construction of AUW and UTTA due to movement of heavy vehicles, machinery, equipment, construction material as well as traffic congestion, noise, dust and vibration. No adverse impacts are expected on indigenous peoples, (known as small tribes, ethnic minorities in Bangladesh) due to the project civil works. The project will take required measures to ensure that the tribal students and teachers, and other vulnerable peoples benefit from project interventions.

Project activities in Afghanistan consist of technical assistance for capacity building with no civil works planned and therefore the project the social risk of the Afghanistan component of the project is deemed moderate.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

This standard is relevant. The project will support several new construction and rehabilitation activities. The construction of the AUW complex will comprise of: (i) construction of academic buildings including the main seminar rooms, lecture halls, theaters, & faculty offices, (ii) construction of internal roads & retaining walls because of the hilly location, (iii) construction of utility facilities at AUW like mini sewage treatment plant (STP), chiller plant for air-conditioning, central fire detection and fire fighting systems etc. to meet the requirement of operational phase of current activities, as well as that of future developments - auditorium, a sports field, gymnasium and swimming pool, a complete set of student, staff and faculty housing

Since the site designated for the AUW campus is hilly, the land development of the site may require hill profiling and construction of retaining walls or implementation of bio engineering measures to prevent landslides, minimize soil erosion and stabilize hilly slopes. According to the Project Master Plan profiling of the hills may eventually generate approximately 1,124,000 cubic meters of excess earth which will need to be managed both during the construction and operational periods to avoid dust generation, soil erosion and unmanaged disposal. Also, the transportation of this excess soil materials off-site can have impacts on local traffic. During the construction phase, solid waste generated will be handled by the existing infrastructure of the City Corporation collection and landfilling system. However, the ESMP implementation will ensure the excess soil will not be used to fill / reclaim wetlands, low lying areas and sensitive habitat areas.



During the construction phase wastewater will be managed using portable/temporary toilets provided and managed by the contractors. Also, during construction, the existing road network will be used for carrying the construction material. The Chattogram Development Authority (CDA) road from City has a RoW (Right of Way) of 30 meters. A 2x2 lane urban motorway is able to carry more than 30,000 vehicles per day. This road will be able to accommodate the traffic induced from construction work. As the volume of traffic will increase, it may also increase the possibility of accidents. Limiting speed using speed breakers, proper signage will be introduced. To manage in and out site traffic, the contractor will be responsible for the preparation of the traffic management plan as a part of the Contractor's ESMP.

The construction of the University campus may influence future secondary construction of new housing in the vicinity, supply warehouses, new businesses, traffic congestion, road constructions, etc. It will be the responsibility of the AUW to inform concerned parties about the project objectives, E&S compliances particularly with the ESIA, RPF, LMP, SEP, GBV and GAP etc. The soft copies of all E&S documents will be disclosed in AUW and UGC websites, and hard copies will be kept at AUW and local government's offices.

The project will construct a mini sewage treatment plant to treat liquid sanitary waste (during the operational phase of the AUW Campus). The treated effluent will be reused on site and if required disposed to the existing drainage system during the operational phase. The ESMP includes the requirement of weekly to quarterly monitoring of the water quality (for pH, dissolved oxygen (DO), Biological Oxygen Demand (BOD), Chemical Oxygen Demand (COD), Total Dissolved Solid (TDS), and Total Suspended Solid (TSS)) at the end point of the STP. The mini STP will be completed and ready for operation well before the students move into the campus.

The AUW ESIA assesses the risks associated with the proposed construction works (although no land acquisition is expected), resettlement related impacts including livelihood impacts, access to neighboring sites, labor influx due to construction activities and related contract management issues. While the project focuses on garnering positive gender outcomes, the ESIA assesses the gender and GBV risks associated with project activities, sensitization of staff and mainstreaming issues. Inclusion of IP students, those from remote and poorer areas and those with disabilities will be assessed through a vulnerability analysis. Since the project will encourage exchange of students and faculty across countries, there is a need for awareness raising regarding cultures, languages, acclimatization to different country contexts etc. that the program will pay special attention to. Since most of the targeted students will be women, safety and security, prevention of sexual harassment and gender-based violence issues have been assessed in detail in the ESIA, ESMF and the GBV and Gender Action Plans prepared for the project.

In addition, the project will also support the construction of a central level UTTA with provision of residential amenities, of which the location is yet to be finalized. The facility development or construction under this activity will follow Buildings Act and regulations to ensure climate resilient features that can withstand the impacts of climate change-induced disasters and impacts. An ESIA including the Environmental and Social Management Plan (ESMP), and RAP if required, will be prepared following the guidelines of ESMF and RPF prepared for the project, when the construction site for the UTTA is finalized.

The Project will also provide research grants to support research on areas including bio-medical science, leather and textile technologies, climate change & environmental sustainability, advanced technologies, and local development challenges. All sub-projects supported by research grants, especially those that may involve environmental and



socially sensitive works such as bio-medical, textile and leather technology related research will be screened per guidelines provided in the ESMF and ESMPs will be prepared before the commencement of the activities and their implementation will be monitored closely. The ESMF also covers E&S screening of sub-projects related to establishment and operationalization of Institutional Quality Assurance Cells (IQACs) in selected universities, construction related activities for setting-up fab-labs and i-labs and any other small scale construction activities requested by universities through grant financing requests.

For Bangladesh, an ESIA for AUW, ESMF, RPF, IPPF, SEP, GBV and GAP, LMP and ESCP have been prepared. The ESMF provides guidelines for screening of sub-projects for environmental and social risks and assessment of Borrower's capacity and institutional requirements.

During implementation of the Project, site-specific environmental and social assessments will be conducted as necessary. These assessments will help with adoption of mitigation measures against the environmental and social risks and impacts (through preparation of site-specific ESMPs if required) and address the issues of inclusion, social vulnerability of certain groups, gender and GBV, consultation and communication strategy and any other issues identified via the assessment and the stakeholder consultations. As part of the assessment, consultations with key stakeholders, including vulnerable and disadvantaged communities, will be carried out to identify their concerns and requirements, which will be included in the design of the facilities to strengthen greater support to these population sections. This will also help address potential issues related to Universal Access to project facilities.

The negative lists of ineligible activities under the CERC component has been included as an annex to the ESMF. This will ensure that projects with high/substantial environmental or social risks will not be included in the Emergency Action Plan if the CERC is activated in the future due to an emergency. The ESMF will be updated upon activation of the CERC if emergency activities are not covered by the existing ESMF.

In Afghanistan, the potential impacts will be low to moderate. The environmental risks and impacts of the project activities proposed for Afghanistan are minimal as the project will not finance any construction activities. The project will support provision of IT equipment for the faculty and student to take online courses and trainings. Therefore, waste management protocol will be prepared by the client to manage the e-waste and associated plastic and packaging materials to the extent possible. As the Afghanistan program supports scholarships and development exchange programs for Afghan students, clear guidelines and reporting mechanism would be developed for informing the relevant authorities of any incidents that might occur to students and faculty enrolled under the program this would include any incidents of GBV or SEA/SH. The female student group maybe classified as vulnerable depending on the exact social, economic and ethnic composition of the student body during project implementation. There have been cases in Afghanistan of the sexual harassments and/or abuse of female students in the higher education sector and therefore the project will pay close attention to mitigating this risk.

All involved with the implementation of the project activities will strictly respect and follow the COVID 19 infection prevention guidelines.

All E&S documents will be reviewed and updated as and when necessary in consultation with the Bank and disclosed in country and in the Bank's online system.



ESS10 Stakeholder Engagement and Information Disclosure

In consultation with the Bank, the clients have already prepared inclusive SEPs proportional to the nature and scale of the project and associated risks and impacts in both countries. The SEPs include relevant measures for communications with the citizens and stakeholders and pay attention to the identification of vulnerable groups, particularly women and persons with disabilities, and will facilitate and monitor their participation in the process, including a comprehensive project level grievance redress mechanism (GRM). The SEPs have taken into account that the stakeholders will be both national and regional (participants in the network building efforts).

The SEP for Bangladesh will disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities and provide access to information in a timeframe that enables meaningful consultations with stakeholders on project design and implementation. Principal stakeholders of the project comprise a broad group of primary and secondary stakeholders identified at international, regional, national and local levels. The MoE, SHED, UGC and AUW are important stakeholders being the client agencies and implementers of the project. Besides them, many identified and interested groups will be involved during construction, through the student exchange program and research activities. Communities living in close proximity to construction sites are included as stakeholders as construction activities carry occupational and community health and safety implications.

The main beneficiaries of the project are the students and as such they comprise the most important voices to be heard, particularly female students (also women who have dropped out at secondary education level to understand the barriers and constraints to entry better), exchange students, recent graduates and job seekers, student leaders and associations, residential students, staff (faculty, administrators, admissions office, HR), grievance redress committees and similar bodies at the relevant organizations, parents and guardians.

The draft SEP prepared for BD lays out a comprehensive consultation and engagement plan with specific groups of stakeholders throughout the life of the project with particular emphasis on phases of the project and relevant activities (for e.g. construction).

A project level GRM will be set up as part of the SEP before project implementation to address grievances in a timely manner and following due process. The GRM will be cognizant of and follow required levels of discretion, and cultural appropriateness. There may be complaints on hiring, wage differentials between male and female teachers, foreign teachers, administrative and curriculum related issues etc. The project level GRM must be accessible to all stakeholders, especially students and parents. Separate GRMs will be set up to deal with cases of sexual harassment and GBV as part of the gender action plan, as well as GRMs relevant to ESS2 and ESS5 as part of the LMP and RPF respectively. Meaningful consultations tailored to Indigenous Peoples will be conducted as per ESS7.

The GRMs will include channels to lodge grievances where physical presence is not required, given the COVID-19 situation in the country. The SEP will also be used to provide and share information regarding the status of COVID-19, various health protocols and practices, deter rumors and the alert public of any emergency event since the emergency situation may adversely affect project implementation. Further additional stakeholder consultations will be cognizant of the virus spread and will avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings. If smaller meetings are not permitted, IA will make all



reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype. Communications means will be diversified and social media and online channels, chat groups will be used based on the type and category of stakeholders. Traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) will also be adopted when stakeholders do not have access to online channels or do not use them frequently. Where direct engagement with project affected people or beneficiaries is necessary, IA will identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators. Each of the proposed channels of engagement will clearly specify how feedback and suggestions can be provided by stakeholders.

The government of Afghanistan has also drafted a SEP which also includes a grievance redress mechanism for project beneficiaries.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The proposed AUW academic complex and UTTA construction will entail employment of a large number of direct, contracted, migrant and primary supply workers. For the AUW academic campus, majority of the unskilled laborers will be from the locality whereas skilled laborers may have to be hired from other regions of the country. Estimate number of required laborers for construction of UTTA at Dhaka will be identified once the feasibility study is completed, but both skilled and unskilled workers may be hired locally. The number of required laborers for renovation and upgradation at different selected universities and Women Colleges will be minimal and can be hired locally. For any workers living onsite, the Contractors will be responsible for providing onsite accommodation, adequate water supply, sanitation services, etc.

Though the project will create substantial number of jobs, it is expected that the number of workers on site will not be significant at any given time during the construction phase as it will be spread over five or more years.

Off site movements of the laborers may raise some E&S concerns, particularly regarding potential transmission risks for COVID-19 both within the worksite and for nearby communities. Adequate engineering, health and safety measures will be adopted to avoid any issues in community health. Contractors will ensure site specific health and safety plans are in place to prevent or minimize any outbreak of COVID-19. Site specific labor management plans will be prepared by contractors for each project site. These will include procedures on accident/incidents investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures, and community awareness raising activities, codes of conduct, gender and GBV issues etc. The labor site plan and on-site facilities for laborers will be a part of the C-ESMP.

As mentioned above, the project does not expect a significant influx of labor at any given phase of construction. Issues such as child labor in the supply chain, forced labor, GBV, occupational health and safety have been addressed in the AUW ESIA and UGC ESMF. The engagement of male labor may lead to an increase in prostitution, sexual harassments and GBV in the locality. Furthermore, it is noted that the research workers, teachers and students of the



universities may be subject to sexual harassment, sexual exploitation and other gender-based offences. The GBV and GAP address these issues in details.

An LMP have been prepared by the SHED/UGC as a stand-alone document, to cover the requirements of ESS2. This covers ESF requirements pertinent to direct, contracted, community and primary supply workers. The salient points and appropriate requirements from these documents have been incorporated in the ESCP. A specific Grievance Redress Mechanism (GRM) has been outlined for the workers to report any issues relating workplace safety and other concerns. The LMP also 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 (especially COVID-19). Issues such as child labor, forced labor, gender and GBV issues, occupational health and safety will be addressed in the bidding and contract documents as well as ensuring required training and awareness program. Adequate OHS protections in accordance with EHSGs and GIIP in relation to protection from COVID-19 will also be implemented. The LMP is directed to localize the economic benefits for local workers and direct 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 develop, adopt and implement a Labor Management Plan as part of the bidding documents. To ensure the health and safety of workers during construction the contractors will prepare and implement an Occupational Health & Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety Guidelines and local legislations.

The project will support exchange program for teachers and students. An Emergency Plan will be developed during project implementation for any student or teacher involved in any accident or incident while supported by the project. Both Bangladesh and Afghanistan will have their own Emergency Plans.

In Afghanistan, the overall responsibility for the Project implementation would lie with the Ministry of Higher Education (MoHE). The TA activities proposed for Afghanistan will be implemented by environmental and social specialists who have been hired through the Operations and Monitoring Support team (OMST) under the on-going World Bank funded Project – Higher Education Development Project (HEDP). The mentioned staff will be retained throughout the HEAT project implementation phase.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project will support construction of buildings that are more energy and water efficient. Since all discharges from the AUW campus/complex will finally fall into the existing canal on the north side of the campus, which is connected to Karnafuli River, the wastewater from the campus will be treated before being discharged in the canal and the effluent should meet the DoE requirements.

The ESIA shows soil generated from hill profiling for implementation of entire AUW master plan as 1,873,000 cubic meters of which only 427,000 cubic meters will be used during construction leaving about 1.44 million cubic meters for disposal and other use. The hill profiling will be conducted in phases over a long period of time depending on the implementation of the overall master plan. The exact amount of soil generated during the project implementation period have not yet been determined. Open soil dumping will create excessive dust pollution in the area, therefore, the excess soil will be covered and kept in an fenced area at an identified place for temporary storage throughout the



implementation and operation phases. The transport and safe disposal of excess material is the responsibility of the Contractors.

The ESIA also calculated that the requirement of drinking water to be 1,589,749.2 gallons and 46,208,229 gallons for non drinking purpose for 4.5 years of the construction period. Drinking water will be supplied from municipal water supply authority connection during construction and operation phases. The ESMP limits the usage of ground water only for non-drinking purposes. The surface water from the on-site canals and as well as rainwater harvesting will be used for non-drinking purposes during construction phase. The construction material will be procured from the local sources.

For operation phase, the building designs will include energy efficient technology available in the market for cooling purposes, solar panel will be encouraged to use for lighting the street lights in the campus and natural light will be used as much as possible in the main building.

During operation phase of the AUW Campus, the wastewater from the campus will be treated before being discharged in the canal and the effluent should meet the DoE requirements – this can have a positive impact on the water quality of the polluted canal. Environment friendly material will be used for slope stabilization.

The wastewater system of UTТА (during operation phase) should be connected with the sewerage network of the area. Alternate brick materials can be used for building construction which may eventually reduce the air pollution indirectly. The UTТА ESIA to be prepared during implementation, and will address this issue and the ToR of the ESIA will address the requirement.

The project will also support small scale renovation/upgradation works and research activities, which can produce solid and/or liquid wastes and construction wastes. The construction materials for renovation/upgradation will be mostly procured locally. The contractors will be encouraged to re-use the construction wastes. The UGC ESMF identifies and proposes measures to mitigate the relevant risks & impacts (especially waste management). Poor O&M could pose environmental and public health risks. Therefore, sub-projects will be screened to identify potential risks of creating pollution or disease hazards. Based on the screening results, subsequent mitigation measures will be suggested in the ESMP and implemented.

Like the proposed project, the previous Higher Education Quality Enhancement Project (HEQEP) also had the competitive grant for supporting research. The lesson learnt on the practices of generated waste management from the supported research grants in the HEQEP shows the generated solid and liquid wastes were disposed in onsite university waste bins. The wastes from research grants included chemical and biological waste which were collected in bins and the bins were collected and transferred to a local secondary stations, from where the City Corporation/Municipality dumped the wastes at designated landfill sites. Chemical wastes were neutralized before being released into university's main drainage system. It is important to mention here that liquid chemical waste containing organic solvents and toxic substances were detoxified and kept in sealed containers for few days before being finally released in a water tank near the laboratory. After certain time, the overflow from the tank enters the onsite drainage system and then enters the local/urban drainage system off-campus. Other solid wastes like syringe, needles etc. were put in a poly bags and burnt in designated incinerators. The universities prepared activity specific ESMFs and Standard Operation Procedure (SOP) as a part of the research grant request. A Senior Environment



Consultant reviewed those ESMPs before awarding the grants. Also the project created awareness on the safe disposal of e-Wastes during subproject visits. Similar due diligence will be demonstrated for handling any harmful (toxic and hazardous) research wastes for HEAT. The ESMF provides guidelines for handling the generated e-wastes in the future, as currently the capacity to handle e-waste in Bangladesh is very limited.

ESS4 Community Health and Safety

Activities under this project may give rise to a number of risks to community health and safety. The construction materials of AUW academic complex and UTTA may be carried through the populated urban areas. Also, transportation of construction wastes and excess soil materials off-site will have traffic impacts. Adequate traffic management, provision of alternative access points/roads, road-crossing safety procedures will be put in place once the Contractor is mobilized. The ESCP mentioned the requirement of the preparation of an area specific traffic management plan. Labor influx during the construction phase may affect the local community and increase the risk of GBV. The other pertains to the exposure and/or increased risks of diseases by the community due to influx of people during construction and operation. For all the construction work, the ESMP should include the obligation of the contractors to safeguard the community health and safety aspects along with OHS. The civil works will affect the local communities living and working in the vicinity of the sites. Adequate engineering, health and safety measures should be adopted to avoid any issue on community health. Contractors will be required to develop site specific procedures or plans so that adequate precautions are in place to prevent or minimize an outbreak of COVID-19. A Community Health & Safety Plan will be required from contractors, which will also include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and community awareness raising activities. Provision should be made for contractors to make arrangements of adequate cautions and warning signs for the potential risks in the site. Any accidents or fatalities on all sites should be responded to on an emergency basis and will have to be immediately reported to the Bank team. The potential exclusion risk of persons with disabilities will be assessed both from the aspects of infrastructure design as well as education services, as per the concept of universal access. WBG EHS guidelines have been followed in the preparation of the ESIA, ESMF and labor related plans.

COVID-19 spread among construction and project workers will also need to be taken into consideration during implementation, given the nature of how the disease spreads from human to human. 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.

In Afghanistan, as the project involves only technical assistance activities GBV risks are considered low therefore gender/SEA/SH related concerns and grievances will be identified and addressed through stakeholder engagement and the project level GRM setup as part of the SEP. A standalone GBV and Gender action plan has been already prepared for Bangladesh.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement



Overall impacts on land acquisition and resettlement for Bangladesh is expected to be low, and not relevant to the TA activities proposed for Afghanistan. The AUW academic complex will be constructed on land owned by AUW. Other infrastructure renovations and upgradation works for labs, ICT infrastructure, facilities in women’s colleges and universities will be carried out within the existing buildings and premises and no physical or economic displacement of people is expected. Two alternative land/sites in Dhaka, owned by the Government of Bangladesh have already been identified as potential sites for the construction of UTTA. As the two identified sites are in Dhaka, there are possibilities of the presence of squatters, encroachers and vendors who might be affected during implementation. Though AUW academic complex may also affect some business squatters and vendors during construction. Moreover, due to the movement of heavy vehicles, the sub-project may cause construction induced impacts and temporary obstruction to access to the nearby location from the main entry/exit points while works are underway. Once the sites for construction of UTTA, and universities and colleges for rehabilitation works are selected, screening will be conducted by PIC following the guidelines of the RPF prepared for the project.

Subsequent Environmental and Social Management Plans (ESMP) and Resettlement Action Plans (RAPs) will be developed during project implementation based on the outcomes of the screening. The ESMPs and RAPs will be reviewed, consulted upon, approved, and disclosed both in the country and on the World Bank’s website prior to the commencement of the civil works.

The national laws on land acquisition, labor, gender policy and policies relevant to inclusion in education are weak in Bangladesh. The national laws and processes governing land acquisition in the country do not recognize squatters/those with informal or user rights, replacement value, livelihood impacts, consultation, grievance redress, etc. Labor Laws exist and can be identified as a comprehensive piece of legislation but are not followed or enforced inconsistently across sectors. The project will put in place/adopt measures to mitigate the risks posed by gaps in national policies.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Although historically, the proposed area of the AUW campus was known to be inhabited by wild animals, the ESIA identified that the project site is located in modified habitat with no known important habitats for wildlife. AUW already cleared the site long ago and the connecting and approach road to the campus already exists. The UTTA site is expected to be in built-up part of Dhaka City. Therefore, that site is unlikely to be relevant for this standard. However, the ESMF includes guidelines for screening for such issues during site selection.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

Although the project will not work specifically in areas where there is a concentrations of IPs, the AUW education program will induct and encourage enrollment of IP students and those from marginalized areas and backgrounds. Students with disabilities will be included and encouraged to enroll.

There are no interventions that may have any adverse impact on small ethnic communities and minorities in the overall project. If there are any such students or teachers in the selected public universities and/or government/non-government persons/s who opt to undertake the training and utilize the facilities provided by the project, they will be free to do so with equal access and opportunity as all other users. An Indigenous Peoples Planning Framework (IPPF)



has been developed based on stakeholder consultations and assessment of baseline scenarios to ensure the inclusion by way of enrollment of IP community members. All the public universities and colleges have practices to secure student’s enrollment Quota for the indigenous people. Some private and international universities in Bangladesh also follow the same and considering the proportionality of risks in this regard. In the operational phase, the UTTA can provide support and programs for IP teachers/researchers.

ESS8 Cultural Heritage

The AUW is in the peri-urban area whereas the UTTA site may be in a congested urban area. During initial field visit to AUW site no signs or evidence of cultural heritage were identified. The locations of the universities participating in the research grant activities are unknown; an assessment will be done to make sure that sub-project activities will not have any adverse impacts on any heritage sites. A chance find guideline has been included in the ESMF and will be part of works contracts and in the bidding document requiring contractors to stop construction if cultural heritage is encountered during any work and to notify and closely coordinate with relevant mandated country authority for the salvaging and restoration of such cultural heritage.

ESS9 Financial Intermediaries

N/A

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

N/A

IV. CONTACT POINTS

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Public Disclosure



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Borrower/Client/Recipient

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Borrower: Islamic Republic of Afghanistan

Implementing Agency(ies)

Implementing Agency: Ministry of Education Bangladesh

Implementing Agency: Ministry of Higher Education

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VI. APPROVAL

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