

**RESILIENT INFRASTRUCTURE FOR ADAPTATION AND
VULNERABILITY REDUCTION PROJECT (RIVER) (P173312)**

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

People's Republic of Bangladesh

December 2021



RIVER

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The People's Republic of Bangladesh is planning to implement the Resilient Infrastructure for Adaptation and Vulnerability Reduction Project (RIVER) (the **Project**), with the involvement of the Ministry of Local Government, Rural Development and Cooperatives (MoLGRDC) (Local Government Engineering Department, LGED). 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 LGED 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), GBV/SEA/SH Action Plan and Small Ethnic Community Development Plans (SECDP) as per 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 LGED 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 Agency (LGED) 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>Quarterly reporting within 02 weeks of end of a calendar quarter throughout the Project implementation.</p>	PIU
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 ten calendar days of the incidence. Develop Safeguard Corrective Action Plan (SCAP) and after approval from WB implement the same.</p>	PIU
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Ensure that contractors and consultants submit monthly monitoring reports on ESHS management including staff/workers management, SEH/SH management, grievance response, traffic management, OHS and CHS management, safety and security breach and training provided to consultants/staff/workers. Such monthly reports will be shared with the Association upon request</p>	<p>Monthly (by 10th of every following month)</p>	PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Recruit and appoint Environmental Specialist, Social Development Specialist and a Gender Specialist. The Social Development Specialist must have experience in land issues.</p> <p>The Contractors will recruit their own Environmental, Health, and Safety Specialist (EHSS).</p>	<p>Recruitment process of the Specialists for PIU will be completed within 2 months from signing of legal agreement. PIU will designate own staff right from preparation period to administer and address ES issues and interacting with the Bank team and other stakeholders.</p> <p>Contractors 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 PIU.</p>	<p>PIU</p> <p>Contractors</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Carry out site specific E&S screening and assessment in accordance with the ESMF (which has been prepared, reviewed by the Association and Disclosed) to identify E&S risks and impacts of each sub-project as per the procedure mentioned in the ESMF including vulnerability to access development benefits, risks of GBV/SEA/SH and share the screening report with Association for review and clearance. Depending on the outcome of the screening result, site specific environmental and social assessment/site specific ESMP for each sub-project would be prepared and shared with the Association for review.</p> <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>ES screening at the identification of subproject and if warranted from screening results the ES assessment of subprojects will be done prior to commencement of bidding process and updated within 30 days of any change in the project design.</p> <p>Within 30 days from CERC activation</p>	<p>PIU</p>



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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 ESA along with ESMP.</p>	During detailed design and before bidding process of the respective subproject.	PIU and Contractors
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Ensure inclusion of all relevant conditions and E&S specifications in the bidding documents based on the site specific ESMFs and will thereafter, ensure that the contractors comply with the E&S specifications of their respective contracts including employment of at least 75% of local labor.</p> <p>PIU will supervise contractors throughout Project implementation.</p>	During preparation of bid documents and throughout project implementation.	PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>Ensure proper implementation of the LMP (which have been prepared, reviewed by the Association and disclosed) during implementation of the Project activities. Ensure that necessary conditions are included in the bidding documents to comply with the provisions set out in the LMP.</p>	During preparation of bidding documents and throughout project implementation.	PIU
2.2	<p>GRIEVANCE REDRESS MECHANISM FOR PROJECT WORKERS</p> <p>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 GBV/SEA/SH issues including provision of a referral system. Other than GRM at works site, responsive system will be in place at the PIU.</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.	PIU and Contractors



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Include necessary conditions in the bidding documents and contracts to ensure occupational health and safety (OHS) of the workers as specified in the site specific ESMPs and LMP and monitor its implementation.</p>	During preparation of bidding document and throughout the implementation of the project.	PIU and Contractors
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT:</p> <p>Incorporate waste management measures to manage waste associated with the implementation of the sub-projects including construction-related wastes into the site specific ESMPs for each sub-project according to the ESMF and include those the ES specification of the bidding documents.</p>	During preparation of site specific ESMP and preparation of bidding documents.	PIU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Consider resource efficiency and pollution prevention and management measures during preparation of site specific ESMPs for the sub-projects.</p> <p>Ensure inclusion of necessary ES specification in accordance with the site specific ESMPs in the bidding documents for pollution prevention and would take initiative to reduce, reuse or recycle waste material to the extent possible.</p>	Same timeframe as for the preparation and implementation of the ESMP	PIU
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</p>	Before commencement of civil works and remain operational throughout works contract implementation.	PIU and Contractors.



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	develop Traffic Management Plans, and this will be binding in Contract document.		
4.2	<p>COMMUNITY HEALTH AND SAFETY: Prepare site specific ESMP for each sub-project covering assessment and management of specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, response to emergency situations, community health & safety, handling of hazardous material and wastes etc.</p> <p>A GBV/SEA/SH Action Plan to address GBV/SEA/SH issues has been prepared</p>	<p>Same timeframe as for the preparation and implementation of the ESMP</p> <p>Will be disclosed before appraisal and implemented throughout project implementation</p>	PIU
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 informal settlers are likely to be affected as well as for temporary land requisition and voluntary land donation may be expected (the ARAPs can be in the form of a specific section of the relevant ESMPs rather than free-standing documents if number of informal settlers are small). In case of voluntary land donation is materialized, the procedure for the same will be followed in light of ESS5. The Project will not fund any activities that will require private land acquisition.</p>	<p>Will be prepared before the closing of appraisal and implemented throughout project implementation after approval from the MoLGRDC and the Bank</p> <p>RAP/A-RAP will be prepared prior to initiated of corresponding bidding process if there are informal settlers present in the area and are likely to be affected as well as if temporary land requisition and voluntary land donation are anticipated.</p>	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS:		PIU



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Develop and implement measures and actions to avoid, minimize, or mitigate potential impacts that may have some significant negative impact on the biodiversity and on the sustainably management of living natural resources. These measures and actions will be part of the ESMPs to be prepared in accordance with the ESMF	Same timeframe than for the implementation of the ESMPs.	
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 ethnic minority communities for each subproject/activity, where needed. The Project will carryout meaningful consultation with ethnic minority communities and exclude any activities that will require Free, Prior, Informed Consent (FPIC) from the SECs.</p>	<p>Prior to Project appraisal and implemented throughout project period</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>	PIU
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	PIU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	The Project will not include any Financial Intermediary		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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>	The project SEP will be developed and disclosed before appraisal.	PIU
10.2	<p>PROJECT GRIEVANCE REDRESS MECHANISM (GRM)</p> <p>Prepare, adopt and operate a GRM, as described in the SEP, which should be able to address GBV/SEA/SH related complaints, land issues and small ethnic community grievances.</p>	Within 3 months of signing of project legal agreement, intimated stakeholders of the presence of mechanism through proper communication and updated from time to time as needed and implemented throughout project implementation.	PIU



CAPACITY SUPPORT (TRAINING)			
<p>All staff of the PIU and Contractors 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. PIU 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:</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/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 and Social compliance monitoring 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. Efficient use of resources and prevention of pollution 12. Emergency procedure and response including emergency reporting, Root Cause Analysis (RCA) and Safeguard Corrective Action Plan (SCAP) 	<p>Training of PIU staffs and consultants to be completed within 6 months of Effectiveness and thereafter yearly once.</p> <p>Staff of Contractors will be trained within two months of Contract signing and throughout the project period. PIU will select training modules from the list of previous columns as appropriate.</p>	<p>PIU E&S Specialists, M&E Specialist will prepare the modules and deliver the training. WB ES Staffs will assist in the preparation of modules</p>