



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 05/16/2022 | Report No: ESRSA02208



BASIC INFORMATION

A. Basic Project Data

| | | | |
|---------------------------------|---|--------------------------|----------------------------|
| Country | Region | Project ID | Parent Project ID (if any) |
| Bangladesh | SOUTH ASIA | P176549 | |
| Project Name | Accelerating Transport and Trade Connectivity in Eastern South Asia - Bangladesh Phase 1 | | |
| Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date |
| Transport | Investment Project Financing | 4/25/2022 | 6/21/2022 |
| Borrower(s) | Implementing Agency(ies) | | |
| People's Republic of Bangladesh | Bangladesh Land Port Authority (BLPA), National Board of Revenue (NBR), Roads and Highways Division (RHD) | | |

Proposed Development Objective

The development objective is to increase the efficiency and resilience of trade and transport along selected corridors in Bangladesh

| Financing (in USD Million) | Amount |
|----------------------------|----------------|
| Total Project Cost | 1057.50 |

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 Project will support the modernization of transport and trade enabling infrastructure, systems and procedures in Bangladesh. It will include infrastructure facilities at Benapole, Bhomra, and Burimari land ports, Custom House, Chattogram and Customs, Excise and VAT Training Academy, Chattogram. The infrastructure will be premised on digitalization, contact-free and paper-free processing. The project will also support the development of an automated



border management system coupled with support for streamlining border processes. and associated capacity building support to enable contemporary trade facilitation practices. The project will also finance the Sylhet – Charkhai - Sheola- Sutarkandi corridor which is a major road linking Sheola land port with Sylhet divisional headquarter. The road is part a strategic regional corridor, the Bangladesh-China-India-Myanmar (BCIM) corridor which extends from Kolkata, India to Kunming, China.

D. Environmental and Social Overview

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

Bangladesh is prone to regular natural disasters such as floods, cyclones and tidal surges. Both Bhomra and Benapole land ports and also Chattogram (for NBR) are located in coastal zone and witness periodic cyclones. Although tidal surges can also occur but the sites are not affected due to their relatively high elevations. The sites are also rarely affected by seasonal floods, which is also the case for Burimari land port as well as the RHD’s Sylhet Road. No important critical habitats, protected areas and wetlands are situated around the project’s foot print areas. No indigenous people also live around any of the project sites. Except, Burimari of Lalmonirhat district, none of the subproject’s districts are the lowest poverty quantile as per the most recent Household Income and Expenditure Survey, 2016 of the government of Bangladesh. The land use around the RHD road and BLPA land ports are mainly agricultural lands. There are some water bodies, such as rivers, which are used for fishing and navigation. Along the RHD road there are a few villages, towns and local markets.

In Burimari land port area, most affected groups are landowners (17%), and people owning land close to the road (17.0%) are those who will be most adversely affected by the implementation of the project. But the whole community (88.0%) will benefit from the project. In Bhomra land port area, landowners (54.98%) and people owning land close to the road (19.12%) will be most adversely affected by the implementation of the sub-project. However, according to most people the whole community (133%) will be benefited by the sub-project. In Benapole land port area, according to the people’s perception, 46.28% land owners will be affected whereas the community development will be 59.84%. As per the social survey in the land port areas it is identified that in most cases the respective land owners are in state of such vulnerability.

As per the consultations and secondary data analysis at the three land ports it is found that road accidents are very common in the land port areas due to high number and mobility of vehicles moving around within the narrow roads. There is also possibility of human trafficking especially of women.

D. 2. Borrower’s Institutional Capacity

All four implementing agencies, BLPA, MoC, NBR and RHD, are currently implementing Bank-financed projects. BLPA, NBR and MoC are jointly implementing the Bangladesh Regional Connectivity Project 1 (BRCP-1) under safeguard policies, and RHD is currently implementing Western Economic Corridor and Regional Enhancement (WeCARE) MPA program under ESF. All four IAs for this proposed project, thus, have some experience of E&S risk management for Bank-funded project. However, the implementing agencies’ institutional knowledge of ESF require further enhancement and it is expected that during project implementation E&S capacity strengthening as well as hand holding will be required.

Since BLPA, MOC, and NBR do not have experience with the ESF, there will be upfront technical support to the project teams towards adequate assessment and management of environmental and social impacts of the program. Each IA



will have a Project Implementation Unit (PIU) with a dedicated E&S specialist. All the IAs will require further institutional E&S risk management capacity building.

The proposed institutional capacity building support under the project will include setting up of an Environmental and Communication Cell headed by a senior officer from the IA with qualified specialists (consultants) recruited from the market. In addition, given the duration of the Program, potentially spanning over 10-12 years, scope of setting up a separate institutional E&S Risk Management Unit will be explored at BLPA. This will also include a comprehensive training and capacity development plan for the IAs. The key issues of the borrower’s capacity building are included in the client’s Environmental and Social Commitment Plan (ESCP).

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

A. Environmental and Social Risk Classification (ESRC)

High

Environmental Risk Rating

Substantial

The overall environmental risk rating for the project is Substantial. This is due to the nature and scale of civil works, which are mainly rehabilitation and expansion activities to be carried out under the project. Furthermore, from the E&S screening and ESIA, it has been envisaged that no environmentally sensitive areas that would be affected by the project activities. The new building infrastructure under NBR and BLPA are typical buildings that require standard construction procedures but these too will be carried out in existing areas owned by NBR and BLPA. Therefore, the potential environmental risks and impacts are typical for construction works: air, water and noise pollution, land degradation and generation of construction wastes. For the expansion of the Sylhet-Sheola road specific risks and impacts are assessed to be largely manageable, as the civil works will be carried out on an existing road without any significant risks and impacts on environmentally sensitive receptors such as natural and critical habitats. The project area is largely agricultural and the related risks and impacts, however, are typical for medium- to large-sized construction works with known engineering and housekeeping measures, which will be adopted and implemented by the project. For the expansion of the Burimari land port, environmental risks and impacts are assessed to be localized and confined within the existing footprints and largely related to construction-related impacts. For example, there can be temporary impacts on air quality, surface and groundwater. However, these can be mitigated by standard measures. To mitigate these risks the ESIA along with ESMP will also include tree plantation plan, proper traffic management plan, noncontaminated source of fill material, OHS application at source material site, aquatic fauna and flora management plan, etc. In the operations phase there will be waste management issues related to operation of offices and land port activities: general wastes, e-wastes and spoiled perishable goods discarded by importers/exporters as well as usual typical occupational health and safety issues. Under this project, there is scope of enhancement measures such as use of renewable energy in the new buildings, reuse of wastewater and composting of biodegradable wastes. The road improvements are also expected to improve traffic-related incidents and road safety. As mentioned in Section D.2, all four Implementing Agencies have the familiarity and experience in implementing Bank-financed projects and are thus familiar with the ESF requirements. However, performance of the PIUs from E&S perspective need to be closely monitored during project implementation.

Social Risk Rating

High

The social risk rating is ‘high’ since the project involves substantial land acquisition by BLPA and RHD with the consequent involuntary resettlement impacts affecting residential and commercial structures, businesses, land

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owners, and informal occupants. Other social risks include: (i) community health and safety concerns such as a potential increase in SEA/SH incidents, increase in traffic related incidents and accidents, exposure to noise, dust and other construction materials and waste during the construction and operation of major road sections,; and (ii) exposure of workers and nearby communities to COVID-19 and to other communicable diseases. The project sites are all located in urban or per-urban areas and does not anticipate major labor influx. There are also no indigenous peoples found in the project footprint areas. The project feasibility and design will take into account avoiding or minimizing land take from private owners and put mitigation measures to reduce related impacts from involuntary resettlement as well as necessary required measures during construction and operation phases. The ESIA/ESMP and RPF also include specific risk mitigation measures for the vulnerable and dis-advantaged groups or peoples. All four implementing agencies have experience in implementing Bank-funded projects and in the case of RHD, an MPA program under ESF. This also includes land acquisition and involuntary resettlement for both BLPA and RHD. Further, following the requirements of the ESF, additional measures for E&S risk management capacity of the 4 IAs are included in the project which are also incorporated in the ESCP. Thus, the ability of the implementing agencies to adequately assess and manage pertinent risks and impacts of the project is expected to help realize overall benefits, by enhancing trade across the region, ensuring effective and efficient transit of goods, creating jobs and improving the safety of communities living along the highways.

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 as the project activities are expected to have environmental and social risks and impacts. The proposed rehabilitation, expansion works and ancillary facilities will occur in existing facilities and alignment. Overall E&S risks of the project include: land acquisition and involuntary resettlement, labor influx, occupational and community health and safety including SEA/SH and STDs during construction and operation phase, exposure to Covid-19 and other risks of child labor in the construction sites, use of natural resources (water, soils, wood); pollution of air, water and soils; noise and biodiversity impacts.

The widening and improvement work of Sylhet - Charkhai - Sheola - Sutarkandi Road that will be carried out within the expanded RoW will have sizable land acquisition requirements (313.93 acres) and will involve physical and economic displacement of project-affected people, structures, and public utilities. In addition, construction-related risks and impacts are also expected, including increased risk to health and safety of workers and communities, increased traffic flow and traffic-related accidents and social issues related to increased labor influx such as gender-based violence and child/forced labor. The improvements of Sylhet - Charkhai - Sheola - Sutarkandi Road are also assessed to have limited cumulative impacts as works are mainly within an existing road alignment and in an area that has already been altered over many decades because of human population growth, agricultural and aquaculture development, encroachment, establishment of new settlements along the highway, land use transformation, and other associated development.

The SEA/SH risk is assessed as 'substantial' at appraisal stage, from 'moderate' risk rating at PCN, as clarified above in the section under SEA/SH risks.



The project uses a combination of frameworks and site-specific instruments. An ESIA for the Sylhet-Charkhai-Sheola-Sutarkandi Road has been prepared that meets the requirements of the ESF. This has been consulted and will be disclosed prior to appraisal. Similarly, an ESIA has been prepared and will be disclosed before project approval for the Burimari Land Port given its advanced stage feasibility and design. An Environmental and Social Management Framework (ESMF) has been prepared for MOC, BLPA and NBR to guide the preparation of specific instruments whose scope, feasibility and/or designs are yet to be determined, and once the details of the activities are available. The ESMF specifies procedures for assessing and identifying vulnerable and marginalized communities and proposes strategies for gender and social inclusion. The E&S assessments also explore in detail the concerns pertaining to “inclusion and access” of the disadvantaged and vulnerable groups and set forth necessary measures for this purpose. The ESMFs also provides the guidelines for periodic assessment of borrower’s capacity and institutional requirements. During implementation, site-specific environmental and social assessments in accordance with the ESMF will be carried out prior to the commencement of the specific work. In addition to the ESMF, a Resettlement Policy Framework (RPF) has also been prepared that will guide preparation of site-specific Resettlement Action Plan (RAP) for the widening of the Sylhet - Charkhai - Sheola - Sutarkandi Road and upgradation of land ports at Benapole, Bhomra and Burimari, which will require land acquisition.

The salient features of the borrower’s E&S risk management have been included in the ESCP.

ESS10 Stakeholder Engagement and Information Disclosure

The borrower has prepared a stakeholder engagement plan (SEP) covering all the four IAs which will be disclosed prior to appraisal. The SEP identifies the stakeholders specific to all the IAs and provides the detailed modalities and approaches for engagement with the stakeholders in line with their relevance to the project. The project stakeholders include a broad range of groups and individuals from diverse backgrounds. This includes potentially among project affected groups/parties (as identified in the SEP): (1) People and households who will lose their land, assets and properties and displaced as a result of land acquisition; (2) Informal occupants who will be displaced and face loss of livelihoods as a result of involuntary resettlement or other interventions of the project; (3) Businesses, traders, small shop owners who face disruptions in their income and livelihood from project interventions or land acquisition; (3) Women traders/business owners, (4) Training participants, particularly women, in the training; (5) Public who uses land port and custom house facilities; (6) Neighboring communities to the project sites and (7) COVID-19 affected people as a result of the project or using project facilities or services.

The SEP also identifies the Other Interested Groups/Parties as following: (1) Civil Society Organizations (CSOs); (2) Trade unions at land ports; (3) Chambers of Commerce; (4) Businesses and Trading houses; (5) Clearing and forwarding agents; (6) National and International NGOs; (7) Transporters and transport unions; (8) National and local media; (9) Local government institutions (LGIs) including the city/municipal corporations; (10) Government officials at the sites/local level; (11) Border guard Bangladesh and, police and any other law enforcement agency related to boarder security.

Finally, the SEP also specify the vulnerable and disadvantaged groups who may face the impacts disproportionately or not able to access the project equally due to their vulnerable social, economic, occupational or cultural conditions. This includes, although not limited to, the following: (1) Women and poor street vendors who may face dislocations



due to land acquisition or civil construction; (2) Person with disabilities (PWD) who depend for livelihood on access the current infrastructure of the IAs; (3) Poorest households whose livelihood are likely to be disrupted due to civil works or land acquisition; (4) Women-headed households who face displacement from land acquisition; (5) Slum/tenement dwellers around/nearby the sites who face displacement or disruptions of income due to civil works or land acquisition and (6) Local communities who may face temporary or permanent disruption of income or livelihood from civil works

The preparation of the SEP and other E&S documents (e.g. ESMF, ESIA) involved extensive consultations and engagement with the relevant stakeholders. The feedback from these consultations inform the design of civil works as well as implementation modalities and risk management and mitigation measures. The SEP also includes a detailed plan of activities with earmarked budget to engage the stakeholders along with a Grievance Redress Mechanism (GRM) to receive and address project-related complaints and grievances from project-affected persons, groups and stakeholders. The SEP also details the program’s communication strategy and provide for feedback mechanisms that will facilitate uptake and use of stakeholder concerns in a systematic manner. Finally, the SEP will be considered a living document and will be updated/ revised to adapt to the changing context of the project.

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 project activities will involve (a) direct workers (i.e. staff/technical specialists engaged by the PIUs in the project implementation); (b) contracted workers (i.e. workers engaged by civil contractors); and (c) primary supply workers (i.e workers of construction material suppliers such as sand and gravel and loading/construction material transport services). The number and type of workers required are not expected to be large and will not be more than 200 for each IA at any given time during the construction phase.

However, regardless of the number of workers, construction activities under the project will expose workers to labor and OHS risks and impacts including injury from maluse or misuse of tools and equipment, burns from hot asphalts, fatal traffic accidents, as well as falls from heights. The sites are not in the flood-prone zones but natural disasters are common experience in the country. The land ports in Bhomra and Benapole as well as the custom house and training academy for NBR in Chittagong are located in coastal areas which are subject to periodic cyclones. These natural events and disasters pose additional risks to project workers. Despite the decline of new infections and as well as fatalities in the recent months from COVID-19 in Bangladesh, the disease remains a public health concern and could spread among workers especially when relevant protocols are not observed on site or in workers accommodation. These risks underscores the relevance of this ESS for managing risks of the project.

To achieve the objectives of ESS 2 the Borrower has prepared an LMP for all 4 IA’s with recommended measures and actions on how to address and mitigate the identified gaps in national labor laws during implementation. Particularly, the Labour Act does not explicitly require that development projects be assessed and reviewed regarding labor and working conditions, including OHS requirements, before approval and also does not require development projects to prepare Labour Management Plans/Procedure or OHS Plan. Furthermore, the Labour Act states the age of working as over 14 years, which conflicts with the Bank’s requirement of 18 years. Additionally, Labour Act does

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explicitly cover SEA/SH risk arising from labor influx, construction and labor works, as such a standalone SEA/SH Action Plan has been developed. The LMP details the modalities for hiring and disengaging workers, and procedures to ensuring that all workers receive clear contractual agreement with detailed wage/remuneration rate and payment schedules/timeline. The LMPs also outline labor requirements (how different categories of workers will be managed, in accordance with the requirements of national laws and ESS2) and risks associated with the project, and as well as provisions against child and forced labor. To ensure the health and safety of workers during construction, the IAs will require the contractors to prepare and implement Occupational Health and Safety Plan (OHSP) following the WGB EHS Guidelines (for construction activities), GIIP and relevant OHS standards.

The OHSP will include measures to address protection from COVID-19 as per WHO guidelines and relevant national legislation. Following measures required under ESS4, an emergency prevention and preparedness plan will be prepared to include protocols and standard operating procedures (SOPs) to respond to emergency events such as fire, earthquakes, mudslides and sudden outbreak of infectious diseases (e.g. COVID-19) among workers. Trainings on the SOPs and other related procedures will be provided to all categories of project workers. Signage will be posted in all public spaces mandating hand hygiene and PPE use. The IAs will also ensure availability of adequate supplies of PPE (particularly facemasks, gloves, hand-washing soap and sanitizer) at its premises. The OHSP will also include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures, and continuous worker training/awareness. OHS measures applying to the Project will be set out in the bidding documents and the ESCP. Finally, the LMP will include provisions/procedures for a labor-specific standalone GRM where all project workers will be able to raise work-related grievances, including SEA/SH.

ESS3 Resource Efficiency and Pollution Prevention and Management

Water, energy and nature-based resources such as sand, stones, timber and wood are expected to be used during construction and operation of key project installations. At the same time, the use and disposal of such resources can pollute and degrade the environment. BLPA, RHD, MoC and NBR, will adhere to GIIP to mitigate the risks and impacts of pollution from potential sources such as dust and emission from operation of hot-mix and batching plants, crushers, construction and haulage vehicles, material and spoil stockpile; effluents and wastewater from labor camps, construction camp; spillage or leakage during handling of chemical admixtures, hazardous materials like bitumen, high strength diesel, used oil, battery wastes etc.; and disposal of non-hazardous wastes (municipal wastes) during project implementation period. The full extent of use and potential adverse impacts of project activities on natural resources will be assessed in detail during the preparation of ESIA. The implementing agencies NBR, MoC, RHD, and BLPA will ensure the execution of the waste management plans, including e-waste throughout the project implementation period. Site specific ESIA and the feasibility studies will provide detailed analyses on these investments and assess the potential impacts of waste handling and disposal and inform the site-specific ESMPs of the requirements for appropriate hazardous and non-hazardous wastes disposal practices for mitigating and preventing pollution from the mentioned sources. Waste management and pollution mitigation measures will be further addressed in the waste management procedures under the contractors' ESMP.

The implementing agencies will also ensure green and resilient design for reconstruction/renovation of sub-project infrastructure along with an action plan to achieve expected outcomes in having safe running water; functioning and clean toilettes with adequate sewage management systems, liquid waste processed before discharge. Water and



energy use efficiency measures will be considered during the design of the facilities, e.g. solar power, rainwater harvesting and wastewater reuse. GHG gas emission estimation will also be undertaken during the site specific ESIA preparation.

For RHD road construction works, the operation of the construction equipment and heavy vehicles and machinery will generate dust, air pollutants and noise especially in dry season while works like site clearing, excavation, cutting, filling, leveling, compaction, etc. is carried out. The Construction activities would also induce siltation and turbidity of streams and rivers nearby. The extraction of materials from inappropriate places or in excessive amount can seriously damage the local environment and natural resources. The road project will also cross several surface waterbodies. The Contractor’s ESMP will include detail procedures for river crossing covering proper measures need to mitigate impacts on geomorphology, water quality, uses, and flow regime of existing water bodies (e.g., erosion and siltation control at bridge and culvert sites such as gabions, silt traps, among others). Increased demand of groundwater is anticipated during the construction stage for both, construction-related activities, which can lower the local water table. Measures should include protection of groundwater from surface contaminants and protection of aquifer cross contamination. Through road upgrading and widening, excess spoils, used oils and chemicals and solid wastes from labor camp may be generated. These wastes need to be minimized and recycled as much as possible and finally disposed of at approved sites according with the national laws and regulations. The ESMP from the ESIA outlines appropriate mitigation measures to control these potential environmental risks and impacts to acceptable levels. These will also be included in the bidding documents of contractors. There will also be third-party monitoring to ensure that E&S instruments for all project components are implemented successfully and corrective actions are undertaken when and where required.

ESS4 Community Health and Safety

The potential project impacts on Community Health and Safety (CHS) include road traffic disruption and accidents in project areas, and the risks for diseases transmission among workers and community members as ‘outsiders’ migrate to project areas for employment and economic opportunities. Construction activities in project areas are expected to raise expectations for jobs and induce labor influx with concerns for traffic safety, spread of communicable diseases, incidents of sexual exploitation abuse and sexual harassment (SEA/SH) especially of women and girls in the communities..

The generation and improper disposal of hazardous substances during construction process, and public safety concerns are also recognized as potential CHS risks and impacts. The existing Sylhet–Charkhai-Sheola–Sutarkandi 2-lane road is unsafe, with very poor to fair pavement condition, and it is overcrowded with different types of vehicles. The proposed project is important in the development and reduction of number of accidents. The construction activities will cause nuisance and health and safety risks to local road users and communities, as identified in the ESIA for Burimari and Sylhet Road and as well as in the project ESMF. During construction stage, there would be a need for creating temporary access. Measures should include traffic speed slowing measures at the locations with no adequate scope for improvement such as sharp curves, school zones and built-up locations. PIU consultants will create Waste Management and Traffic Plans, which the Contractor will then make site-specific.

NBR/BLPA sub-project components are likely to include: i) road excavation, use of vibratory equipment, construction debris handling and disposal etc. during construction; ii) high likelihood of direct exposure to increased construction



related traffic and equipment especially at road sections traversing settlement area with limited carriageway/roadway width, and sensitive receptors such as schools, religious place, health center/hospitals; iii) high dust levels from earthworks/slope cutting, high noise and emission level from traffic congestion and idling of vehicles. These risks and issues will be mitigated as part of ESMPs, which will be further reviewed and updated for application during the detailed design, bidding, construction and operational phases. The ESIA for Burimari LP and Sylhet Road assessed risks posed by security arrangements (specified in the ESCP under ESS4) as moderate in relation to project activities to those within and outside project site and includes relevant mitigation measures in the ESMPs. Similar assessments will be carried out for the remaining ESIA (Bhomra and Benapole LP and the 2 NBR sites in Chattogram), and the ESMPs will include measures to avoid and mitigate such identified risks in accordance with ESS4.

The EHS measures will also cover COVID19 prevention measures and protocols as contained in the ESMF. The contractors ESMPs will include measures to mitigate and minimize the related risks of road traffic and nearby waterways (as applicable) and will put in place necessary mitigation and management measures to address the risks and inconveniences.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project activities present significant risks of land acquisition and involuntary resettlement. The anticipated land acquisition for the BLPA is 93 acres (Bhomra: 40 acres, Benapole 50 acres and Burimari 3 acres) and involves involuntary resettlement related impacts on legal landowners, informal occupants, businesses, tenants, homesteads, and residential and commercial buildings, particularly in Bhomra and Benapole. The Burimari land port involves land acquisition of about 3 acres with only minor involuntary resettlement impacts and assessed as 'substantial' risk. The remaining 22 acres is government owned vacant land. No land acquisition is required under NBR and there will be also no impact on informal occupants. The Sylhet-Charkhai-Sheola-Sutarkandi Road construction involves land acquisition of around 313.92 acres, of which 176.03 acres are crop lands, 28.48 acres are commercial lands, and 31.32 acres are homestead lands. The total number of physically and economically affected households is 4,362, with 17,884 project affected persons. The project activities are also expected to lead to displacement of informal occupants from their existing tenements and/or businesses requiring necessary compensation and rehabilitation, as appropriate, for all such project affected persons (PAPs). For Burimari, this includes 17 landowners with as many houses and about 85 household members. In addition, the affected persons also include 80 temporary roadside shop owners with about 450 dependents. The requisite compensation and business and livelihood restoration provisions will be detailed in the site-specific RAP. The proposed rehabilitation and improvement of customs infrastructure under NBR will take place within the building footprint inside the project area with no requirements of land acquisition, or physical or economic displacement of the local community.

The borrower has prepared a Resettlement Policy Framework (RPF) which will be consulted on and publicly disclosed before appraisal. The RPF provides the detailed guidelines for preparation and implementation of site-specific Resettlement Action Plans (RAPs) prior to land-take and commencement of construction activities. Following these guidelines, RHD and BLPA will prepare site-specific RAPs which will be informed by in-depth census and inventory of the PAPs and assessment with the PAPs and other relevant stakeholders in meaningful consultations, disclosing project impacts and benefits to stakeholders and allowing them opportunities to inform the resettlement planning process. The RAPs will equally include specialized assistance to vulnerable PAPs and households and appropriate compensation measures where relevant with the objectives of improving their livelihoods in line with ESS5. For NBR,



the related mitigation measures from civil works and infrastructure will be incorporated in the site-specific ESIA/ESMPs

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The ESIA and the ESMF confirmed that the proposed activities, which will be implemented in existing facilities and road alignments are not located in areas of biodiversity significance and/or in environmentally sensitive areas. No Protected Areas have been identified during the project preparation. Site clearance activities for road and building constructions will involve removing vegetation and felling of trees. In such cases, site-specific plantation plan will be prepared in addition to the ESMP to compensate loss of trees. The trees to be cut under RHD sub-project (around 44,000 nos.), are all roadside trees and are not connected to any forests and may have some limited, local biodiversity impacts. As part of the continued stakeholder engagement process there will be consultation of the public and NGOs before cutting of existing trees if its cutting is unavoidable due to technical considerations. As part of the mitigation measures, a total of 87,242 trees along the roadway will be replanted. This will consist of a multi-species mix of local vegetation including fruit trees, fast growing (fuel) trees and timber trees. Furthermore, the ESMPs will have specific provisions for managing potential impacts on other biodiversity and living natural resources. The ESMF has provided guidelines and a screening to ensure that when designs and new sites become more firm, the scope of site specific ESIA adequately reflect the potential risks in a proportionate manner. For example, site-specific management plans with detailed ecological studies will be prepared for each sub-project/activity, including application of the mitigation hierarchy if required.

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

This ESS is not currently relevant. No indigenous peoples' communities have been found in or around the impact zone of the sites.

ESS8 Cultural Heritage

The surveys and consultations undertaken for ESMF as well as ESIA BLPA have shown that no tangible or intangible cultural heritage would be affected from the project interventions. However, there some religious and cultural establishments such as mosques, temples and grave yards may be affected by project interventions in Benapole, and Bhomra but no such impacts in the case of Burimari land port and the customs house and training academy of NBR in Chattogram. ESIA of RHD identified number of common property resources such as schools, mosques, graveyards as well which will be affected in the Sylhet-Charkhai-Sheola-Sutarkandi road and, which will require proper relocation.

Further assessments of the sites during the preparation of site specific ESIA/ESMPs will be carried out to verify/identify presence of cultural heritage and depending on the scale of impacts, preparation of a standalone Cultural Heritage Management Plan, will be considered. For physical cultural heritage, chance finds procedures will be included in the ESMPs and chance find clause will be included in works contracts of the contractors requiring the contractors to stop construction if physical cultural heritage is encountered during construction and to notify and closely coordinate with relevant mandated country authorities for the salvaging and restoration of such cultural heritage.



In all cases, the stakeholders will be engaged in identifying and documenting both tangible and intangible cultural heritages, and ensure that the requisite risks assessment and mitigation will be carried out to avoid and/or mitigate project impacts on such resources.

ESS9 Financial Intermediaries

The project does not involves financial intermediaries. As such, this standard is not currently relevant to the project.

B.3 Other Relevant Project Risks

There are no other risks being considered at this stage of the project.

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:

The use of borrower framework is not considered as country laws and regulations show considerable shortfalls relative to the objectives and requirements of the relevant environmental and social standards that are applicable to the project.

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: People's Republic of Bangladesh

Implementing Agency(ies)

Implementing Agency: Bangladesh Land Port Authority (BLPA)

Implementing Agency: National Board of Revenue (NBR)

Implementing Agency: Roads and Highways Division (RHD)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

| | |
|-------------------------------|---|
| Task Team Leader(s): | Nusrat Nahid Babi, Jan Erik Nora |
| Practice Manager (ENR/Social) | Christophe Crepin Cleared on 11-May-2022 at 12:13:9 GMT-04:00 |
| Safeguards Advisor ESSA | Charles Ankisiba (SAESSA) Concurred on 25-Apr-2022 at 13:37:2 GMT-04:00 |

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