



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 07/19/2020 | Report No: ESRSC01492



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Bangladesh	SOUTH ASIA	P173312	
Project Name	Resilient Infrastructure Building Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	5/13/2021	7/29/2021
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Local Government Engineering Department		

Proposed Development Objective

To enhance the resilience of target vulnerable villages to floods, and improve the disaster preparedness and response capacity of government agencies

Financing (in USD Million)	Amount
Total Project Cost	400.00

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 will finance infrastructure and systems to increase the flood resilience of vulnerable rural populations in Bangladesh through: (i) raising of community land, construction of shelters and community facilities, and connecting roads in flood prone villages; and (ii) improving community disaster preparedness including early warning systems, evacuation process, awareness, response capacity, sheltering, and recovery.

D. Environmental and Social Overview



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

The project activities have been proposed for high flood prone areas in the northern Bangladesh, a deltaic country consisting of floodplains created by over 300 rivers and channels, including three major rivers: the Ganges, the Brahmaputra, and the Meghna. Bangladesh is located at the foot of the highest mountain range in the world, the Himalayas, which is also the world’s highest precipitation zone. A quarter of the country’s land area is less than 1m above sea level and half of it is less than 6m above sea level towards the north. The country experience monsoon floods including sustained high floods due to heavy rainfall, river flows coming from the upstream Himalayas, and raised water level in the Bay of Bengal. The proposed project covers the districts of Kurigram, Rangpur, Gaibandha, Bogra and Sirajganj in the Brahmaputra-Jamuna river basin, the districts of Chapai Nawabganj, Rajshahi, Natore and Pabna in the Padma floodplains and Sunamganj and Habiganj districts in the Surma-Meghna basins in the northern areas of the country. Each of these areas, although similar, have important geographical and demographic differences. There are small and dispersed presence of small tribes and ethnic sects in most of these project districts with various traditional culture and practices.

D. 2. Borrower’s Institutional Capacity

Local Government Engineering Department (LGED) under the Ministry of Local Government, Rural Development and Cooperatives will prepare and implement the proposed project. LGED has its presence in the Division, District and Upazila (sub-district) level. LGED has experience of managing environmental and social issues in World Bank supported projects including RTIP I & II, ECRRP, MGSP and MDSP on provisioning of disaster shelters, access roads and other rural infrastructure. However, they are yet to establish a permanent Environmental and Social Unit within LGED for management and oversight of environmental and social issues in project process. LGED is using consultant support including individual consultant resources under project management units. Although LGED is familiar with the Bank’s old safeguard policy, the new Environmental and Social Framework (ESF) of the World Bank rolled in October 2018 is relatively new to them. The project needs to support training on ESF to LGED HQ and field level employees.

LGED has an Environment and Gender Section under a Superintendent Engineer. As committed under the ongoing rural bridges support program (PforR), during preparation of the project, the Bank will pursue with LGED for establishing a permanent E&S unit for management of E&S risks and impacts and implementation of E&S mitigation plans.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

The environmental risk has been determined as Substantial based on the location, type, scale of project interventions, nature and magnitude of potential E&S risks and impacts, and client capacity. Construction of rubber dams can have adverse impacts on local ecosystems depending on their type, size and location. There are many benefits of installing rubber dam instead of conventional dams. These dams can be inflated and deflated as per the requirement. Unlike other structures, the rubber dam is deflated during floods and thus does not create any obstruction to the flow. However, if the location is not properly selected, such dam can cause water stress downstream and can adversely affect downstream ecosystems and any irrigation project operating there. The livelihood of the people downstream

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might also be affected. Constructing such dams can also have an impact on navigation and river morphology. Impacts on aquatic flora and fauna are also likely. Proper operation of dams must be ensured so that dams can be inflated and deflated without causing harm to the environment and community. Extensive community engagement during operation phase must be ensured to avoid negative impact from such dams.

Negative environmental impacts are also likely from construction of flood shelters, connecting roads, jetties and land raising. These impacts would be mostly temporary in nature and reversible. The anticipated impacts are drainage congestion and water logging during the construction period, temporary surface water and ground water pollution, construction related dust, air and noise pollution etc. Also, Environmental Health and Safety (EHS) issues like occupational safety of workers and safety of students near the construction area would be vital issues during construction.

Social Risk Rating

Moderate

Social Risk rating at this stage has been determined to be Moderate. The risks rating will be reviewed at the preparation stage. The project will benefit the communities in the high flood-prone areas in the country increasing their resilience to flood events. Project social risks are anticipated with the (i) construction and rehabilitation of flood shelters and access road to shelters, elevating community open space, and construction of small-scale community infrastructure like rubber dams and river jetties; (ii) workers and community health and safety associated with civil works; (iii) labor influx in a rural and urban setting; (iv) presence to small ethnic communities in the project area; (v) capacity of the implementing agency as to comply with the new ESF of the World Bank for the first time; and (vi) risks related to outbreak of COVID-19 pandemic. Sites for project civil works will be restricted to lands those are legally and socially designated and used for public or community purpose with space or scope for project civil works. Local demand may induce to select private land on voluntary donation basis where existing public or community land may not be available. Therefore, potentials for physical or economic displacement of people will be none or fairly limited including third party impacts. But construction of temporary school sheds, site camps, labor sheds and storage facilities by contractors may require additional lands in some circumstances. Selection of land for civil works will avoid any adverse impacts on small ethnic communities but they are present in some of the project districts among the beneficiaries.

Construction activities will be concentrated in rural villages or in urban neighborhoods and a major share of the construction workers will be brought in from outside the area. Whatever small, labor influx, according to past similar experience under LGED, may associate low to moderate risks of gender based violence (GBV) and gender concerns among project staff including construction workers and the surrounding community. Movement of vehicles and construction materials may create short-term impacts in the surrounding communities during the construction.

An environmental and social management framework (ESMF) and resettlement policy farework (RPF) would be prepared during project preparation and disclosed before project appraisal following a due process of consultation maintaining health protocols in COVID-19 situation, with elements for gender, GBV and labor influx for mitigation of the likely risks and impacts to arise during design and construction of civil works under the project. A stakeholder engagement plan (SEP) will be prepared and followed through.

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 proposed project will mainly support construction and rehabilitation of multipurpose flood shelters with access roads and adequate water, sanitation and Hygiene (WASH) and other ancillary facilities so that flood affected people can stay there with their belongings during flood time. The project would also support raising of community space so that the flood-free community spaces can also be used as flood refuge. Shelters will fulfill multipurpose uses, most notably as educational facilities for primary education. Project will also support construction of a few small jetties/ghats and a few small-scale rubber dams on various water bodies.

The new shelter/school building with access road will be constructed at the same premises of the existing schools. Playgrounds of these schools or any other community open spaces will be raised to be as flood-refuges. The specific locations will be identified during implementation stage. The environmental impacts of these shelters and other project activities such as access road, raising of community space and small jetties are expected to be mostly construction related and limited within the existing available public or community lands. However, impacts of construction of small-scale rubber dams and construction/rehabilitation of connecting roads will depend on the specific location.

The project will identify vulnerable and disadvantaged groups and individuals from the target areas and devise opportunities for their participation in project activities and employment in the project civil works on a priority basis.

Project coverage areas have been chosen from the high flood prone areas along the major river systems, but the exact locations of the project activities will be finalized during implementation stage. Therefore, a framework approach will be adopted for proper environment/social risk assessment and management. A Project Environmental and Social Management Framework (ESMF) will be prepared to assess and manage the environmental and social risks and impacts covering different typologies of sub-projects . The ESMF will have a screening criteria and a negative list based on which sub-projects would be screened and the level of due diligence required identified i.e undertaking an ESIA, developing ESMPs, implementing codes of practice, etc. The implementation experience of ESMF-TDF of the current MDSP prepared under the old safeguard policy would inform the preparation of the ESMF of RIDP. The ESMF will include specific requirements to be considered for rubber dams and construction/rehabilitation of connecting roads. The baseline beneficiary satisfactory survey on the existing disaster response facilities will be undertaken and this will be repeated during mid-term and end term to assess the impact of the project on the satisfaction levels related to disaster risk mitigation facilities.

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

Borrower Framework would not be used.

ESS10 Stakeholder Engagement and Information Disclosure

The project plans and the experience in previous and ongoing projects indicates that flood shelters will be constructed and developed using the existing government primary school premises, flood refuges on the adjacent open grounds or alternate community land, community access roads, rubber dams across small local rivers/canals,



river jetties. Stakeholders of the project then include the diverse communities, school committees, teachers, students, local and regional contractors, suppliers, farmers, media, NGOs, Bangladesh Water Development Board (BWDB), Department of Disaster Management (DDM), local administration, local elected representatives, women and child rights groups, and others. According to experience from similar projects under LGED, the affected groups among the stakeholders may include displaced persons for third-party impacts of voluntary donation of land, people providing lands for temporary classrooms, contractors camps, labor sheds, and storages facilities during construction period, and the teachers and students of the government primary schools (GPS) hosting the shelters for any disturbance in schooling. With the outbreak of COVID-19 across the country, Department of Health personnel, Upazila Hospital and Union health clinics may also to be involved in the COVID-19 response process in the process of civil works construction. LGED will prepare a Stakeholder Engagement Plan (SEP) outlining general principles and a collaborative strategy and plan for an engagement process in accordance with this standard. Meaningful consultations with local communities on the shelter designs will be captured adequately. The SEP will describe how local communities including vulnerable groups and individuals will be engaged in this process. If indigenous peoples are present in the project areas, a stakeholder engagement strategy for this group will be included in the SEP and such a requirement will be reflected in the ESCP. A draft of the SEP will be disclosed prior to project appraisal.

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

This standard is relevant. Overall occupational health and safety (OHS) risks for the workers are likely to be moderate. Civil works financed under the project at individual work sites will likely involve a small of number of direct workers and contracted workers. Construction works are likely to generate only low to moderate labor influx since the scope of the physical construction works is on average small at respective sites. However, in case of rehabilitation of existing schools, there is possibility that workers would come in contact with harmful substances like asbestos during rehabilitation or demolition, if necessary, for which proper OHS needs to be ensured. OHS in such cases would be moderate. Given the size of civil works at an individual specific site, risks of GBV and SEA related to the project have also been assessed as low using the World Bank GBV risk assessment tool. However, the client needs to prepare a Labor Management Procedure (LMP) to address these risks including OHS, labor GRM and workers' codes of conduct, particularly in relation to GBV/SEA prevention.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant. Impact on physical environment from the shelter, access road, land raising, and jetty construction would not be very high and mostly contained within the construction phase. During construction phase, air emissions will include exhaust from vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are people living within the proximity of the construction sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will need to be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration. Surface water might be contaminated from construction activities. As the civil construction to be supported through this project will be small to medium scale in nature, requirements for construction materials will not be significant. Raising of land might require dredging or carted earth which needs to be carefully sourced to minimize impact on



environment. An assessment of source of dredging material needs to be included in the ESMF to find out possible ES impact of such activities.

Use of renewable energy should be encouraged in the flood shelters such as rainwater harvesting, use of solar powered light, fan and water pumps. Solar power would particularly helpful as disruption of electricity during flood time is very likely. Solar powered water pump can also be used to raise ground water where suitable ground water is available.

Construction of rubber dams may impact navigability and interrupt flow of the water bodies. These will increase water level upstream and may create water stress downstream while inflated. The ESAs and ESMPs will be developed in line with the requirements laid out in the ESMF to manage the environmental impacts. Water management plan covering upstream and downstream of the proposed locations needs to be prepared and this should be reflected in the ESMF.

ESS4 Community Health and Safety

This standard is relevant at this stage and will be further assessed before appraisal. Health and safety concerns of the urban and rural communities are associated with labor influx, movement of vehicles and construction materials at works sites for construction of medium and small community level infrastructure for flood resilience in their locality. Labor influx at works sites during the COVID-19 pandemic may increase the risks of transmission of the infections among the community members. Potential risk may likely stem from the possible weak implementation of contingency plans, workers code of conduct, poor public awareness, and lack of information. The project will adopt community health and safety plans for contractors for works management including contingency plan with health protocols for workers in response to COVID-19 pandemic.

The construction of new shelters would take place within the existing school premises and likely to occur when schools are in session. All measures will be taken to ensure the health and safety of the students and teachers attending the school such as putting physical barriers to separate the construction area. Construction materials such as rods, aggregates, steels etc. should be properly stored so that these do not pose any safety threat to the students or local community. Sand and other construction material has the potential of polluting air and has to be appropriately covered. Vehicles due to construction activity may increase traffic movement, can cause traffic jam and can pose threat to the safety of the road users, specially the students. A site specific traffic and road safety plan needs to be prepared for each individual site and this should be reflected in the ESMF.

To further ensure the safety and health of the students and teachers GBV assessment be conducted to inform whether an Action Plan is required.

The location and design of the dam should be such that the these do not adversely affect water availability down stream. As the main purpose the rubber dam is to impound water upstream during dry period, design should take into consideration any possibility of overtopping of impounded water risking the safety and livelihood of the people in the upstream. The location, timing and duration of operation has to be finalized after extensive consultation with the people both upstream and downstream of the proposed location. Any adverse impact on the navigation through



the water body should be taken into consideration while selecting location for such dams. Height of the dam and impoundment of water has to be determined after extensive feasibility and consultations so that impoundment of water does not affect safety of people at either side of the dam.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is relevant. Application of this standard will be further assessment during project preparation. The location of sites for flood shelter, access road, high ground for flood refuge, rubber dams and river jetties; the type and current use of land required for their construction will be identified during the implementation stage. The project, however, has chosen to use public and community lands currently in use and designated legally for community use including existing schools, playgrounds, community lands, community access roads, canals/ rivers and riverbanks. LGED has experience in similar projects (ECRRP and MDSP) in the cyclone prone coastal region of the country. New shelters under these projects were largely constructed within existing available land of host GPSs. In unavoidable circumstances, voluntary donation of land was accepted. It is however, likely that voluntary donation of land will be the only option for a particular site and clearing the land in question may cause displacement of third parties using the land. The principles to be followed for voluntary donation will be described in RPF. If private lands for permanent civil works, and taken through voluntary donation, the transfer will be registered in favor of the GPSs and third-party impacts will be avoided or managed as per project RPF. The project will avoid involuntary acquisition of private lands and physical displacement of people. A negative list will also be included in the RPF. In unavoidable circumstances, private lands can be used through voluntary donation for permanent purpose and on rent for temporary requirements. Private lands may be required for temporary period by the contractors for construction of alternative school sheds, construction camps, labor camps, stackyard and storage facilities and contractors are responsible to arrange on mutually acceptable terms with the owners of those lands. Social screening will be conducted for each site for involuntary resettlement issues, ownership, current use, and availability for project use. A Resettlement Policy Framework (RPF) will be prepared as per this standard to guide social screening, social impact assessment and preparation and implementation of site-specific Resettlement Plans.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is relevant. Construction of access roads might have negative impact on biodiversity depending on the location of such roads. This aspect needs to be addressed in the screening process and reflected in the ESMF.

Construction of rubber dams might have impacts on aquatic flora and fauna depending on the location. The rubber dams would be mostly inflated during the lean periods when river flow in the water bodies would be low. Usually inflated period varies between 2-3 months in a year and may impact aquatic flora and fauna, specially downstream and needs to be carefully assessed. Environmental assessment will be undertaken in line with the requirements laid out in the ESMF to identify and manage the environmental impacts.

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



This standard is relevant. Selection of land for civil works will avoid any adverse impacts on small ethnic communities (tribes, minor races, ethnic sects and communities) but they are present in some of the project districts among the beneficiaries. The negative list in RPF will include avoiding adverse impacts to these groups. The interventions under the project especially early warning system and awareness as well as mechanisms for the inclusion of small ethnic communities where they exist will be adapted to their situation with a view to effectively include them in the communication and participation process, and accessing project benefits. Small ethnic community's inclusion approach will be included in the ESMF and RPF for identification, design and implementation of subprojects. Meaningful consultation will be undertaken for subproject implementation process where the small ethnic communities are present.

ESS8 Cultural Heritage

This standard is relevant. The investment activities to be financed under the project may be in areas containing tangible or intangible objects of cultural heritage. The ESMF for the proposed project will include specific measures relating to avoid and/or managing potential impacts on cultural heritage sites, compliant with the requirements of this standard. A chance find procedure will be included in ESMF.

ESS9 Financial Intermediaries

Not relevant.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

Would not be used.

B. Proposed Measures, Actions and Timing (Borrower's commitments)

Actions to be completed prior to Bank Board Approval:

Preparation, consultation and disclosure of draft ESMF and RPF before appraisal.

Preparation, consultation and disclosure of the draft Stakeholder Engagement Plan (SEP) before appraisal

Preparation and disclosure of draft Labor Management Procedures (LMP) before appraisal

Preparation and disclosure of draft Environmental and Social Commitment Plan (ESCP) before appraisal



Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

- Preparation, consultation and disclosure of ESIA's and ESMP's of each sub-project following procedure mentioned in ESMF and RPF
- Negative list of activities to avoid adverse impacts on local communities
- Meaningful consultations on shelter designs and incorporation of local needs in the final designs.
- Implementation and monitoring of the Construction ESMP and RAP (if applicable)
- Preparation of feasibility study for rubber dam construction
- Implementation of Institutional Capacity Strengthening Plan for LGED (establishment of permanent E&S unit and training in ESF topics)
- Implementation of Labor Management Procedures (LMP)
- Implementation of Stakeholder Engagement Plan (SEP)

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

30-Nov-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Finance

Implementing Agency(ies)

Implementing Agency: Local Government Engineering Department

V. FOR MORE INFORMATION CONTACT

Public Disclosure



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VI. APPROVAL

Task Team Leader(s):	Swarna Kazi, Ignacio M. Urrutia Duarte
Practice Manager (ENR/Social)	Christophe Crepin Recommended on 13-Jul-2020 at 11:36:43 EDT
Safeguards Advisor ESSA	Agnes I. Kiss (SAESSA) Cleared on 19-Jul-2020 at 19:17:43 EDT