

BANGLADESH CLEAN AIR PROJECT (BCAP)

**Draft ENVIRONMENTAL AND SOCIAL
MANAGEMENT FRAMEWORK (ESMF)**

(Will be updated within two months of effectiveness)

Department of Environment (DoE)

Bangladesh Road Transport Authority (BRTA)

Dhaka Transport Coordination Authority (DTCA)

Government of the People's Republic of Bangladesh

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Executive Summary

Background

Bangladesh is currently among the most air-polluted countries globally, with severe impacts on people's health, productivity, and welfare. The government is situated in the Indo-Gangetic Plain and Himalayan Foothills (IGP-HF) region, a global air pollution hotspot. The annual average levels of ambient fine particulate matter (PM_{2.5}) – the air pollutant associated with the highest health effects – range from 60 to 100 µg/m³ in Bangladesh and 90-100 µg/m³ in Dhaka, exceeding the World Health Organization (WHO) Air Quality Guideline (AQG) several times. In 2019 alone, exposure to PM_{2.5} in Bangladesh led to more than 159,000 premature deaths and 2.5 billion days lived in illness, with estimated health costs equivalent to 8.3 per cent of GDP. The most vulnerable groups, such as women, elders, and children under five years old, bear the brunt of such exposure. The crisis also impacts a city's attractiveness and competitiveness by reducing livability and productivity.

The Bangladesh Clean Air Project (BCAP) will support the Government of Bangladesh (GoB) in essential steps towards improved air quality as part of a series of projects. The Project supports interventions from the National Air Quality Management Plan (NAQMP) 2024-2030, the country's strategy to meet the WHO Interim Target 1 for annual PM_{2.5} of 35 µg/m³. Based on an airshed-based approach, the Plan envisages multi-sector, cost-effective measures to enhance the GoB's capacity for air quality management (AQM) and control emissions in targeted sectors. In Phase 1 (2025-2030), BCAP will finance activities to (i) enhance institutional capacity for effective AQM, including collaboration with neighbouring countries and jurisdictions within the IGP-HF region; (ii) improve enforcement of vehicle emissions limits, and (iii) implement a bus modernisation program and transition to e-buses.

To focus on the current air pollution scenario and its deadliest impact on public health and to strengthen air quality management and reduce emissions from targeted sectors, Bangladesh Clean Air Project (BCAP) has been initiated by the Ministry of Environment, Forest and Climate Change (MoEFCC) with the support of Department of Environment (DoE), Bangladesh Road Transport Authority (BRTA), Dhaka Transport Coordination Authority (DTCA), and potential funding from the World Bank (WB).

The PDO is to strengthen air quality management and reduce emissions from the transport sector. The BCAP project encompasses two main components and following sub-components.

Component 1: Strengthening Air Quality Governance (Implementing Agencies: MoEFCC, DoE)

Subcomponent 1.1. Regulatory and Policy Development

Subcomponent 1.2. Institutional Capacity Development

Subcomponent 1.3. Continuous Emissions Monitoring Program (CEMP)

Subcomponent 1.4: Project Management

Component 2: Reducing Emissions from the Transport Sector (Implementing Agencies: MoRTB)

Sub-component 2.1 Vehicle Emission Control (Implementing Agency – BRTA)

Subcomponent 2.1.a Vehicle Inspection Centers

Subcomponent 2.1.b Technical Assistance

Subcomponent 2.1.c Project Management

Subcomponent 2.2: Bus Modernization Program (Implementing Agency: DTCA)

Subcomponent 2.2.a Capital and Operational Viability Gap Funding (VGF) for electric bus service

Subcomponent 2.2.b. Depot upgradation and power infrastructure

Subcomponent 2.2.c. Intelligent Transport Systems

Subcomponent 2.2.d. Institutional Strengthening, Capacity Building and Project Management for twin transition

Project Beneficiaries

The Bangladesh Clean Air Project (BCAP) is designed to benefit a wide range of stakeholders. These include the population currently affected by air pollution sources targeted by the project, bus users in Dhaka who will access better services, participating government agencies, and private investors. Direct private sector beneficiaries will consist of companies receiving partial grants for installing CEMS, firms operating the new VICs, and those involved in the franchise-based bus services. Public beneficiaries will include staff from MoEFCC, DoE, BRTA, DTCA, BRTC, the National Board Revenues (NBR) and the Local Government Division (LGD). Project-recruited employees will gain stable jobs with social security benefits. At the same time, improved working conditions will enhance occupational health and safety. Families of these workers, particularly women, will benefit from better job opportunities and reduced pollution levels. Additionally, officials from national and local governments will receive support through technical assistance and capacity-building activities.

Project Location

The Bangladesh Clean Air Project aims to address air quality issues across Bangladesh. The project will target areas with high levels of air pollution that suffer from air pollution due to industrial activities, vehicular emissions, and other urban sources. Cities face significant air pollution challenges due to high population density, heavy traffic, industrial activities etc. The project activities will cover the different geographical areas of Bangladesh. The location of CEMPs is not decided. For constructing 5 VICs, five potential districts are preliminary proposed at Mymensingh, Noakhali, Faridpur, Comilla, and Rangamati and improving 4 existing ones at Dhaka, Chattogram, Khulna and Rajshahi. However, these sites may be changed because of the accessibility and technical requirements. The location of bus depots to be developed has also not yet been decided. There is the possibility of small ethnic communities in the project areas, especially component 2 under BRTA, VIC centre at Rangamati (if the site is technically feasible).

Most of the activities will be in the existing premises, urban and peri-urban areas that are already disturbed. So, the project activities are not expected to affect any biodiversity or habitat. Areas of intervention will include mostly plain lands with sparse vegetation and growth—common to the average countrywide social and environmental representations. The project is not likely to affect any cultural heritage. Subprojects with adverse impacts on cultural heritage will be excluded from project financing.

Project Activities

Based on an airshed approach, the proposed Project will focus on (i) strengthening capacity beyond MoEFCC and DoE for effective AQM, including through collaboration across GoB agencies and within the IGP-HF region, and (ii) incentivising emissions reductions from the transport sector. Component 1 will support the GoB by (i) strengthening its analytical, monitoring, and enforcement capacity for AQM and (ii) adopting more efficient AQM policies, such as fiscal instruments and awareness campaigns. Enhanced monitoring and enforcement, combined with citizens' increased access to information, will incentivise emitters to comply with regulations. This is expected to increase demand for technical and financial assistance to be potentially financed in BCAP Phase 2. Additionally, as transboundary cooperation is necessary to meet air pollution targets cost-effectively, Component 1 will promote Bangladesh's participation in the Regional AQM Program for the IGP-HF countries. In Component 2, BRTA and DTCA will implement targeted measures to mitigate air pollution from vehicular emissions while improving urban mobility in critical areas of Dhaka. The activities include (a) the expansion and improvement of vehicle inspection services, (b) the introduction of franchise-based bus services and e-bus infrastructure to streamline public transportation, reducing traffic congestion and the number of older, high-emitting vehicles on the road, and (c) establishing Intelligent Transport Systems (ITS) to facilitate efficient ticketing, contract management, and information dissemination, encouraging the use of public transport.

Legal and Regulatory Framework

Since October 2018, all WB-funded Investment Project Financing (IPF) must follow the ESF consisting of ten (10) ESSs. These ESSs set out their requirement for the DoE, BRTA, and DTCA's identification and assessment of any project's environmental and social risks and impacts. The ESSs support the DoE, BRTA, and DTCA in achieving good international practice relating to ES sustainability, assist them in fulfilling their national and international ES obligations, enhance transparency and accountability and ensure sustainable development outcomes through ongoing stakeholder engagement.

In ECR-23, project components are not categorised explicitly per the DoE list. Based on ECR 2023 proportionality and rationale, this project is classified as Orange due to the nature of the activities and associated impacts. Final categorisation requires DoE confirmation before implementation.

The environmental clearance procedure for Orange and Red Category projects can be summarised as follows:

Application to DoE → Obtaining Site Clearance → Applying for Environmental Clearance → Obtaining Environmental Clearance → Clearance Subject to Annual Renewal.

Environmental and Social Risks

The construction and operation of VICs, the renovation and operation of bus depots, the construction of temporary support structures for the installation of the CEMPs devices at the stacks of the selected industries and the operation of CEMPs at height, renovation & relocation of CAMs, installation of a few strategic stations and/or instruments and other risks and repercussions are mainly associated with the proposed project investments. There might be an issue of scrap/waste management due to replacing the old buses with bus modernization through electric buses and replacing huge batteries after five years of the project operation. During the construction phase, the project will impact environmental quality, including air, noise, water, and soil quality, due to various sources of waste, dust, wastewater, fumigate emissions, and the leaching of oily substances into the soil. Such impact is mainly localised in nature, confined within a limited space, and does not create a severe environmental threat. Occupational health and safety are key concerns at different project stages, necessitating prioritisation in designing interventions, such as increased accessibility in e-buses, safe access, and various OHS measures for operating AQM infrastructure. These impacts will be managed through efficient implementation of the Environmental and Social Management Plan (ESMP) by ESSs and strict adherence to occupational health and safety (OHS) protocols to ensure safe handling. However, any project intervention in environmental and ecological sensitivity and essential ecosystems with high environmental and social risk will be screened out during the screening. The project's resource usage will mainly include raw materials, fuel, electricity, and water. The project will opt for cleaner technology and optimise the use of natural resources. There is little chance that the project's operations will impact habitat, biodiversity, or living natural resources. In most sites, resettlement impacts are expected for VICs and bus depots which are likely to be small. There are possibilities of acquiring land in some areas. Due to civil works, there are also SEA/SH-related risks. Small ethnic communities may be affected in some of the project areas. These issues will be assessed during the ESIA, and mitigation measures will be determined.

Environmental and Social Risk Classification

Environmental and Social Risk Classification (ESRC) of the BCAP has been primarily rated as 'Substantial'. Environmental and Social Assessment (ESA) study, i.e. ESIA, should further assess the exact depth of risks and impacts, based on the evidence, professional judgment and public consultations. Site-specific ESIA will be required for VICs Centers for BRTA and renovation of bus depots for DTCA. The PIUs, i.e., DoE, BRTA, and DTCA, are responsible for conducting ESIA by the ESMF and getting ECC from DoE. ESIA study and environmental clearance will be obtained by the respective PIU of DoE, BRTA and DTCA from the DG, DoE.

As described above, the E&S risks and impacts of the project are expected to be localised, manageable, reversible and confined to the areas/premises that already exist and are located in urban and peri-urban areas

where these environmental investments will be done. These investments are small to medium-sized to manage environmental issues and improve environmental management. The E&S risks and impacts are dispersed since the subprojects will be in different districts/areas. The environmental risks and effects, particularly, would be construction-related, but there would also be some operational impacts.

The social risks and impacts could relate to the potential displacement of illegal settlers/squatters in lands where the environmental investments will be located and some health and safety issues during construction. An RPF will be prepared to address these issues systematically. However, social problems are also deemed manageable and small in scale, given that the works will be in mainly existing premises and that there will be no land acquisition under the project.

SEA/SH-related risks are rated 'Moderate' based on the Bank's tool on "major civil works". The risks relate to the limited capacity of the IAs to manage this kind of risk. The possible risks may include exposure of female workers to abuse and harassment by male peers, along with female e-bus users during their journey time. Mitigation measures include a compliant grievance management system and enforcement of a Code of Conduct for workers. Awareness and communication campaigns will also address SEA/SH risks for managing construction sites and operating AQM infrastructure, VICs, and bus services. For the latter, special attention will be paid to gender aspects. A standalone SEA/SH risk mitigation plan will be prepared and disclosed within 60 days of project effectiveness, and salient features will be integrated into the POM.

Risk Assessment and Management Approaches

Due to the nature of some of the proposed activities under the BCAP project and their potential ES impacts, initial ES screening, in some cases, site-specific ESIA and execution of ESMP. Therefore, the ESMF is prepared based on the following principles that can lead to the planning and implementation of the project activities. The design details of the specific investments will be prepared once the particular locations/sites are selected, which will only happen during implementation. That said, the project has adopted a framework approach in terms of E&S risk assessment and management by preparing and disclosing ESMF before appraisal to guide the client in the screening of the subprojects for their final locations and the preparation and disclosure of specific assessments and plans, where so required, when the locations and design details are known. The ESMF also includes a negative list of subprojects, including those requiring land acquisition and considered high-risk investments. Other ESF instruments prepared and disclosed before appraisal include the SECDF, LMP, SEP and ESCP. An RPF for compensating potential illegal occupants/settlers in areas for environmental investments will be prepared and disclosed before project negotiations.

Environmental and Social Assessment and Management Process

- PIU/DoE, in coordination with the ES experts of the 3 PIUs, will provide technical backstopping and coordination support to the PCMU to perform the ES screening of the BCAP project. The relevant ES experts of the PIUs will start the task during the initial stage of the project implementation.
- If ES Screening identifies any activities that require further ES Assessment, PIU/DoE, in coordination with other PIUs, will engage an independent ESIA consulting firm to generate a detailed ES baseline of the project, conduct initial scoping (or IEE) and prepare a ToR for ESIA study.
- The PIU/DoE, in coordination with other PIUs, will share the scoping/IEE report along with the draft ESIA ToR with the respective clearance office of the DoE.
- PCMU, with the support of the 3 PIUs, will review and clear screening and environmental assessment reports made by the environmental consultant before submitting them for DoE clearance and providing necessary technical inputs.
- PCMU, through 3 PIUs, will verify some screening and assessment through field visits.
- PIUs, through relevant ES staff, will ensure that environmental considerations are given enough attention, weight, and influence over the selection of construction sites, design, and improvement of

infrastructures all over the country.

- The respective PIU will prepare the bid documents. PIU ES consultants will ensure that necessary ES clauses are included in the bidding documents. Contractors/PPP operators/PFIs should implement the ESMP. They should ensure that the budget is adequate for ensuring ESF compliance. PIU consultants and other technical and M&E experts will supervise and monitor ESMP implementation and ES compliance.
- All the activities of the BCAP project will follow the existing Environmental Code of Practices (ECoPs) prepared under ESMF.
- The project will ensure that ESIA addresses all potential ES direct, indirect, and cumulative impacts of the project throughout its life: pre-project, during project and operation stages, and suggest appropriate mitigation measures. ESIA and ESMP should be reviewed and updated if any additional impacts are identified.

Guideline for Preparation of Environmental and Social Monitoring Plan

As one of the key elements of the ESMP, a three-tier monitoring program is proposed comprising compliance monitoring, effects monitoring. The main purpose of this monitoring program is to ensure that the various tasks detailed in the ESMP, particularly the mitigation measures, are implemented effectively and also to evaluate program impacts on the key environmental parameters.

Compliance Reporting

The frequency of ES compliance monitoring reports is appended to the ESCP, which will be semi-annually for regular reports and 48 hours for any incidence.

Guideline to Incorporate Environmental and Social Management in Bid Documents and Project's Operational Manuals

PIUs will incorporate environmental management requirements in the bidding documents and the different operational manuals of the project activities, with the assistance of the ES consultants or other responsible staff. The generic guidelines for incorporating ES aspects for this purpose are listed below. Prepare cost estimates to be incorporated in Bid Documents.

- Contractor version of the ESMP and the ECoPs are to be incorporated into the bid document's work requirements.
- Penalty clauses for not complying with ESMP requirements to be incorporated (as per addendum to Clause 17.2 Contractor's Care of the Works).

Grievance Redress Mechanism

Grievance redress committees (GRC) will be formed to receive and resolve complaints and grievances from aggrieved persons from the local stakeholders, including the project-affected persons. Based on consensus, the procedure will help resolve issues/conflicts amicably and quickly, saving the aggrieved persons from resorting to expensive, time-consuming legal actions. The procedure will, however, not pre-empt a person's right to go to the courts of law. The GRC will be established at three levels: (i) Local Level, (ii) Project level, and (iii) Ministry level. For grievances related to SEA/SH, the 'survivor-centric approach' will be followed. This will be elaborated in the SEP and SEA/SH Action Plan. Separate GRM will be in place for labor-rated and SEA/SH-related matters.

Public Participation and Information Disclosure

During the preparation of the present ESMF, initial consultations with the identified stakeholders (project-affected people, interested parties including ethnic groups (if feasible), and the disadvantaged and vulnerable) have been carried out to obtain their views on program interventions. A Stakeholders

Engagement Plan (SEP) has been prepared for the BCAP project, which will be the primary guiding document for the DoE, BRTA and DTCA sub-projects. DoE, BRTA, and DTCA will address gender issues through participatory approaches that are responsive to the needs of low-income people.

The summary of the ESMF and ESIA report, along with ESMP, will be translated into Bengali language and disseminated locally. In addition, RPF and RAP, if required, LMP, SEP, SECDPF, including the ESIA and ESMF full report (in English), will also be uploaded to the websites of DoE, BRTA and, DoE and WB. Hard copies of the ESIA and ESMF with relevant plans will also be available at DoE, BRTA and DTCA head offices and the sub-project area's divisional and district offices.

Project Institutional and Implementation Arrangement

DOE, BRTA, and the DTCA will implement the project through three Project Implementation Units (PIUs). The PIUs will coordinate all activities at the field level. The rationale for adopting the proposed implementation structure is to follow the mandate of government agencies, be in line with the rules of business and coordination, and enable the most efficient decision-making, considering internal government fiduciary clearance procedures.

DOE will be the implementing agency of Component 1. DOE-PIU will have a dedicated Project Director and one DPD. As the BEST-PIU is currently implementing similar activities, this existing PIU of BEST will be strengthened to implement the activities proposed under the proposed Project. Key E&S staff expected are a Senior Environmental Specialist, a Senior Social Development Specialist, a Gender Specialist, a Communications Specialist, and an M&E Specialist. A Design and Supervision and Monitoring and Evaluation firm will be hired.

BRTA will be partially the implementing agency of Component 2. BRTA-PIU will have a dedicated Project Director and one DPD. As the BEST implements similar activities, this existing PIU of BEST will be strengthened to implement the proposed project interventions. Key E&S staff to be augmented are a Senior Environment Specialist, a Senior Social Specialist, a Communication Specialist, an M&E Specialist, and a Gender Specialist.

DTCA will be the implementing agency for the remaining parts of Component 2. Key E&S staff to be augmented are the Environment Specialist, Social Development Specialist, Gender Specialist, and Communication Specialist.

Following the Government's Rules of Business, the PIUs of BRTA and DTCA will report to their respective Ministerial Project Steering Committee (PSC), chaired by the respective Sr. Secretary/Secretary of the MoRT&B. The PSC for DOE will be chaired under the Sr. Secretary/Secretary of MoEF&CC.

Each project implementation agency will have a Project Implementation Committee (PIC) chaired by the agency head. The PIC will supervise the respective components and must include relevant representatives from ministries, divisions, departments/agencies. The PIC will ensure that implementation follows Government and Bank rules and regulations.

Environmental and Social Management Capacity and Capacity Building Plan

Environmental and social training will help ensure that all project personnel understand and follow the ESS requirements and subsequent social issues throughout the project. The PIUs will ensure, in collaboration with the PSCs, that these training sessions are provided to all project personnel. Training will cover all staff levels, from management and supervisory to the skilled and unskilled categories. The scope of the training will cover general environmental and social awareness, key environmental and social impacts of the program, ESMP requirements, OHS aspects, SH/SEA, and GBV. Different training programs that can be realigned based on the needs will be initiated.

Estimated Budget for Implementation of the ESMF

A budget for implementing this ESMF is initially proposed at \$890,000.00 USD. Once the ESMF has been finalised, this may be changed/updated.

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Acronyms and Abbreviations

Acronyms	Definition
ACC	Autoclaved Aerated Concrete
ADB	Asian Development Bank
AIDS	Acquired Immune-Deficiency Syndrome
AQM	Air Quality Management
A-RAP	Abbreviated Resettlement Action Plan
BAP	Best Available Technology
BB	Bangladesh Bank
BCS	Bangladesh Civil Service
BEP	Best Environmental Practices
BHTPA	Bangladesh High-Tech Park Authority
BIFFL	Bangladesh Infrastructure Finance Fund Limited
BNBC	Bangladesh National Building Code
BoQ	Bill of Quantities
BRTA	Bangladesh Road Transport Authority
BRTA	Bangladesh Road Transport Authority
CAQMS	Continuous Air Quality Monitoring Station
CASE	Clean Air and Sustainable Environment
CCB	Cellular Concrete Block
CDP	Capacity Development Plan
CEA	Country Environmental Assessment
CEA	Country Environmental Analysis
CEDAW	The Convention on the Elimination of All Forms of Discrimination Against Women
CERC	Contingent Emergency Response Component
CERC	Contingent Emergency Response Component
C-ESMP	Contractor's Environmental and Social Management Plan
CFP	Country Financial Parameter

Acronyms	Definition
CGS	Credit Guarantee Scheme
CIA	Cumulative Impact Assessment
CIP	Country Investment Plan
CoC	Code of Conduct
COVID	Corona Virus Disease
CPF	Country Partnership Framework
CWQMS	Continuous Surface Water Quality Monitoring Station
DC	Deputy Commissioner
DGHS	Directorate General of Health Services
DoE	Department of Environment
DP	Development Partner
DPP	Development Project Proposal
ECA	Environmental Conservation Act
ECC	Environmental Clearance Certificate
ECopS	Environmental Code of Practices
ECR	Environment Conservation Rules
EF	Environmental Fund
EHS	Environmental, Health, and Safety
EHSG	Environmental, Health and Safety Guidelines
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMP	Environmental Management Plan
EMU	Environmental Management Unit
EPR	Extended Producer Responsibility
ES	Environmental and Social
ESA	Environmental and Social Assessment
ESCP	Environmental Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESRM	Environmental and Social Risk Management
ESS	Environmental and Social Standards
ETP	Effluent Treatment Plant
FCDO	Foreign, Commonwealth and Development Office
FCK	Fixed Chimney Kiln
FGD	Focus Group Discussion
FI	Financial Intermediaries
FLFP	Female Labor Force Participation
FM	Financial Management
FPIC	Free, Prior, and Informed Consent
FSCD	Fire Service and Civil Defense
FWIP	Future-with-project
FWOP	Future-without-project
GAP	Gender Action Plan
GBV	Gender-Based Violence
GCGS	Green Credit Guarantee Scheme
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
GoB	Government of Bangladesh

Acronyms	Definition
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HHK	Hybrid Hoffman Kiln
HIV	Human Immunodeficiency Virus
HR	human resources
HTP	Hi-Tech Park
IA	Implementing Agency
ICT	Information & Communication Technology
IDA	International Development Association
IEE	Initial Environmental Examination
IFC	International Finance Corporation
IMED	Implementation Monitoring and Evaluation Division
IPCC	Intergovernmental Panel on Climate Change
IPF	Investment Project Financing
IPP	Indigenous Peoples' Plan
IT	Information Technology
IUCN	International Union for Conservation of Nature
IWM	Integrated Waste Management
JICA	Japan International Cooperation Agency
KII	Key Informant Interview
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MIS	Management Information System
MLGRDC	Ministry of Local Government, Rural Development, and Cooperatives
MoEFCC	Ministry of Environment, Forest and Climate Change
MOF	Ministry of Finance
MOPTI	Ministry of Post, Telecommunications, and Information
MORTB	Ministry of Road Transport and Bridges
MoWCA	Ministry of Women and Children Affairs
MSPVAW	Multi-Sectoral Program on Violence Against Women
NBSAP	National Biodiversity Strategy and Action Plan
NDC	Nationally Determined Contribution
NGO	Non-Government Organization
NPL	Nonperforming Loan
O&M	Operation and Maintenance
OHS	Occupational Health and Safety
OHSP	Occupational Health & Safety Plan
PAP(s)	Project Affected Person(s)
PBC	Performance Based Conditions
PC	Planning Commission
PCD	Project Coordination Director
PCM	Private Capital Mobilization
PCMU	Project Coordination and Management Unit
PD	Project Director
PDO	Project Development Objective
PFI	Private Finance Initiative
PIU	Project Implementation Unit
PMCU	Project Monitoring and Coordination Unit
PPA	Project Preparation Advance
PPE	Personnel Protective Equipment
PPP	Public Private Partnership
PPSD	Project Procurement Strategy for Development

Acronyms	Definition
PSC	Project Steering Committee
R&D	Research and Development
RAP	Resettlement Action Plan
RCA	Root Cause Analysis
RCCE	Risk Communication and Community Engagement
RECP	Resource-Efficient and Cleaner Production
RPF	Resettlement Policy Framework
SCAP	Safeguard Corrective Action Plan
SEA/SH	Sexual Exploitation, Abuse and Sexual Harassment
SEC	Special Environmental Clauses
SEVCDP	Small, Ethnic, and Vulnerable Community Development Plan
SEVCDF	Small, Ethnic, and Vulnerable Community Development Framework
SEP	Stakeholders Engagement Plan
SFD	Sustainable Finance Department
SFD	Sustainable Finance Department
SLB	Sand Lime Brick
SMEs	Small and Medium Enterprises
SOP	Standard Operational Procedure
STEP	Systematic Tracking of Exchanges in Procurement
STI	Sexually Transmitted Infection
ToR	Terms of Reference
UN	United Nations
UNDP	United Nations Development Program
UNFCCC	UN Framework Convention on Climate Change
UNICEF	United Nations Children's Fund
UNO	United Nations Organization
VIC	Vehicle Inspection Center
WB	World Bank
WBG	World Bank Group
WHO	World Health Organization
WQM	Water Quality Management

1 INTRODUCTION

1.1 Background

Bangladesh is one of the world's most densely populated countries, with an estimated 173 million people residing in an area of approximately 144,415 km². Bangladesh has been facing increased air pollution in recent years due to urbanization, industrialization, and energy consumption in major cities, especially in metropolitan cities like Dhaka and Chattogram. Right policy actions and measures are not adequately and immediately taken to respond to air pollution. This causes deepening air pollution throughout the country, posing a threat to human health, the environment, and the economy.

Bangladesh's air ranks among the most polluted countries in the world. Even among the cities on the heavily polluted Indo-Gangetic Plains (IGP), Dhaka is one of the most polluted. Annual average ambient (outdoor) delicate particulate matter (PM_{2.5}) across Bangladesh ranges from 60 to 100 µg/m³. In Dhaka, they are 90-100 µg/m³ – many times higher than WHO's air quality guideline (AQG) annual value of 5 µg/m³ and Bangladesh's current standard of 35 µg/m³. In 2023, the annual average of PM_{2.5} in the Greater Dhaka Area was 92 µg/m³– over 18 times as high as the World Health Organization's recommended limit and well above Bangladesh's air quality standard of 35 µg/m³.¹ This makes air pollution in Bangladesh among the highest in the region. Exposure to high levels of air pollution has massive public health impacts; now air pollution is the third highest health risk factor in Bangladesh.

Considering the deadliest impact on public health by PM_{2.5} due to its ability of penetration through the respiratory system deep into the lungs, countries of South Asia have set a Clean Air Vision 2030 to achieve WHO's Interim Target 1 for annual average of PM_{2.5} of 35 µg/m³ by the start of the next decade. However, other pollutants also need to be addressed properly with a target of reduction by 2030. Achieving this vision in Bangladesh requires investments in cleaner energy for households, cleaner fuels, and abatement measures for the power sector. It requires eliminating the open burning of waste, reducing road and construction dust, renewing/retrofitting the heavy-duty fleet, among other abatement measures, focusing particularly on year-round sources of pollution. Achieving this vision will require strong institutional capacity, including inter-agency coordination, as well as diversified policy instruments and a robust monitoring network, among other interventions.

In order to focus on the current air pollution scenario and its deadliest impact on the public health and to strengthen air quality management and reduce emissions from targeted sectors, Bangladesh Clean Air Project (BCAP) has been initiated by the Ministry of Environment, Forest and Climate Change (MoEFCC) with the support of Department of Environment (DoE), Bangladesh Road Transport Authority (BRTA), Dhaka Transport Coordination Authority (DTCA), and potential funding from the World Bank (WB).

The PDO is to strengthen air quality management and reduce emissions from the transport sector. The BCAP project encompasses two main components and following sub-components.

Component 1: Strengthening Air Quality Governance (Implementing Agencies: MoEFCC, DoE)

Subcomponent 1.1. Regulatory and Policy Development

Subcomponent 1.2. Institutional Capacity Development

Subcomponent 1.3. Continuous Emissions Monitoring Program (CEMP)

Subcomponent 1.4: Project Management

¹ As per data from Bangladesh's Department of Environment (DoE), compiling the measurements of the DoE's continuous air quality monitoring stations (CAMS). The measurements for the Greater Dhaka Area (GDA) were calculated based on four CAMS: BARC, Darussalam, DoE, and Savar.

Component 2: Reducing Emissions from the Transport Sector (Implementing Agencies: MoRTB)

Sub-component 2.1 Vehicle Emission Control (Implementing Agency – BRTA)

Subcomponent 2.1.a Vehicle Inspection Centers

Subcomponent 2.1.b Technical Assistance

Subcomponent 2.1.c Project Management

Subcomponent 2.2: Bus Modernization Program (Implementing Agency: DTCA)

Subcomponent 2.2.a Capital and Operational Viability Gap Funding (VGF) for electric bus service

Subcomponent 2.2.b. Depot upgradation and power infrastructure

Subcomponent 2.2.c. Intelligent Transport Systems

Subcomponent 2.2.d. Institutional Strengthening, Capacity Building and Project Management for twin transition

Since the details and locations of the subprojects at this point are yet to be finalized, the project has developed this Environmental and Social Management Framework (ESMF) to describe the procedures on screening the environmental and social (ES) risks and impacts of the project activities and provide guidance to the implementing agencies i.e., DoE, BRTA, and DTCA in the preparation of specific ES assessments and plans for the subprojects to be required during implementation, including implementation of any plans.

Description of the project components and their typology are further furnished in the **Chapter 2**.

1.2 Sectoral Background

In recent days, Bangladesh poses significant impacts on the health, productivity, and people's welfare due to extreme air pollution. Annual average levels of ambient fine particulate matter (PM_{2.5}) – which is globally associated with the highest health effects – range from 60 to 100 µg/m³ in Bangladesh, and 90-100 µg/m³ in Dhaka. Those concentrations exceed by several times WHO's Air Quality Guideline (AQG). Exposure to ambient and household PM_{2.5} in Bangladesh caused more than 159,000 premature deaths and 2.5 billion days lived in illness in 2019, with estimated health costs being equivalent to 8.3 percent of GDP (2019). The poor and most vulnerable groups, such as women, elders, and children under five years old, suffer a disproportional burden from such exposure. Air pollution also affects city attractiveness and competitiveness by reducing livability and productivity.

Despite improvements in regulatory framework and institutional setup, limitations in environmental policies and weak enforcement have rendered Bangladesh's AQM framework ineffective in controlling emission. Until recently Bangladesh lacked a comprehensive, multi-sectoral policy and institutional framework for AQM. The Ministry of Environment, Forest, and Climate Change (MoEFCC) and its Department of Environment (DoE), which oversees pollution control, have managed air quality mainly through ad hoc activities. Despite successful AQM policies such as the ban of two stroke 3-wheelers and reduction of sulfur content in diesel (from 2500 ppm to 500 ppm) in early 2000s, those agencies have relied mostly on the environmental clearance process, rather than using more effective policy instruments – e.g., market-based, information/stakeholder policies –, strengthening enforcement (especially after clearance certificates and through automated systems), and improving inter-ministerial coordination. DoE needs a transformational change in its approach to environmental management.

1.3 Rationale and Basis of the ESMF

To assess ES impacts specifically, it is important to know precise subproject design, activities and locations. However, BCAP project and its sub-projects' location and design are yet to be finalized. Therefore, nature and magnitude of the potential environmental and social risks and impacts are exclusively not known and identified. Hence, it is essential to develop and follow a framework approach of the project's ES assessment and management procedure. The ESMF has been prepared based on the overall assessment of the proposed project components and the areas that might be covered. Safeguard Consultants from the WB-BCAP ESF

Team is assisted DoE, BRTA, and DTCA to prepare the ESMF following the WB Environmental and Social Framework (ESF). However, following screening, site specific assessment along with management plans will be prepared during implementation in accordance with ESMF as soon as the exact location, layout, detail activities of subproject along with design are known.

The rationale for developing the framework is based on the consideration that all subprojects under the BCAP will only be identified and prepared during the implementation of the project. Therefore, detailed site investigations will be carried out as part of identifying specific project activities and related designs at the selected locations to ascertain the precise nature of the environmental and social impacts.

1.4 Scope of the ESMF

The ESMF will provide necessary background for environmental and social considerations, a checklist of potential issues of the project activities to be considered and built into the design of the project, environmental and social screening of subprojects and guidance on the preparation of specific assessments and plans. This ESMF will also serve as the guideline for the staff designated by the implementing agencies to oversee and monitor the safeguards compliance of the project components under their implementation responsibility. It will be a living document and will be reviewed and updated periodically as needed.

This ESMF has been prepared as a constituent part for guidance in the implementation stage along with other required ES documents for disclosure prior to board approval, consistent with the ESF and the GoB environmental regulatory framework. In addition to the ESMF, the following are the other ES instruments have been developed at the appraisal stage:

- (a) Stakeholder Engagement Plan (SEP) with a Grievance Redress Mechanism (GRM);
- (b) Labor Management Procedures (LMP) with labor specific GRM;
- (c) Appraisal Environmental and Social Review Summary (A-ESRS);
- (d) SEA/SH Action Plan (SAP);
- (e) Environmental and Social Commitment Plan (ESCP).

In addition, a Resettlement Policy Framework (RPF) will be prepared before negotiations.

The preparation of the ESMF considered the following:

- Screening of all sub-projects, components, and activities to be implemented under the BCAP project based on feasibility study initial reports to make a preliminary assessment of the potential ES issues;
- Consideration of all applicable ESSs including guidelines and standards prescribed in the WBG's Environmental, Health and Safety Guidelines (EHSG) and existing GoB's environmental standards;
- Assessment of policy implications for the proposed project activities considering WB, GoB and International laws/conventions/practices, and identify policy gaps between WB and the GoB, and suggest options for gap minimization;
- Development of a framework and guidelines for preparation of subproject specific screening, Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plans (ESMPs) (measures to reduce, mitigate and/or offset adverse risks and impacts) that comply with local ES laws and the WB ESF and Environmental and Social Safeguards (ESSs);
- Recommendations on institutional implementation and monitoring arrangement including project-specific GRMs;
- Conduct of stakeholder mapping and subsequent consultations to cover groups/ communities/ stakeholders to elicit their views and suggestions on actions and measures for inclusion in the SEP to ensure inclusion of the potential project affected persons, vulnerable and marginalized groups and ethnic communities including women in the project preparation process;

- Development of ES capacity building plan that will include a broader ES capacity assessment of DoE, BRTA, and DTCA which will be incorporated as action points in the Borrower's Institutional ES capacity development plan which has been reflected in the ESCP.
- A cost table and budget to be adopted in the project budgetary provision to ensure implementation of the ESMF and develop ES management capacity of the partners.

In accordance with WB policies and GoB regulations, the necessity and nature of ES assessments and management plans will be examined and updated in accordance with the availability of information about the project locations and activities at later stages of the project.

1.5 Objectives of the ESMF

The ESMF will adhere to all relevant ESSs and be in line with the ESF's standards. In order to identify all potentially positive and negative ES risks and impacts in accordance with the ESF, the ESMF will also include detailed guidelines for conducting screening and ESIA along with the ESMP of the sub-projects. It will also recommend measures to ensure that all negative ES risks and impacts are appropriately mitigated and offer workable alternatives to avoid/minimize potential and adverse ES impacts. In fact, the ESMF is intended to be used as a practical tool during program formulation, design, implementation, and monitoring in BCAP. The main objectives of this ESMF are to:

- Provide guidelines and methods for classifying the risks of each sub-project that will be carried out under the BCAP project, for which detailed information is currently unavailable.
- Describe in detail the steps to be taken in order to evaluate and control ES risks for different sub-project categories.
- Identify strategies to prevent, reduce, and manage risks and impacts while maximizing benefits by taking into account the program's possible ES risk, benefits, and impacts holistically.
- Make sure that all pertinent ES concerns are incorporated into the sub-projects' design and execution.
- Provide guidance for preparation of various ES instruments.
- Provide guidance for ensuring stakeholder engagement at various stages of the sub-project implementation.

1.6 Approach and Methodology

The ESMF has been prepared following the standard methodology consisting of the steps listed below, which is also depicted in

Figure 1.

- Review of the project documents and discussion / meetings with the DoE, BRTA, DTCL, and WB;
- Review of the policy and regulatory requirements;
- Collect and analyze baseline ES data with the help of secondary literature review and field data collection;
- Conduct reconnaissance field visit by group of experts and implementing agencies and initial scoping and screening to determine the key environmental and social parameters and aspects that are likely to be impacted by the program activities;
- Consult with the stakeholders and developing the consultation process;
- Assess the potential and likely impacts of the project activities;
- Prepare an outline of the ES management issues according to the requirements of the ESSs of the ESF;
- Prepare an outline of ESMP; and
- Compilation of the individual thematic reports into ESMF.

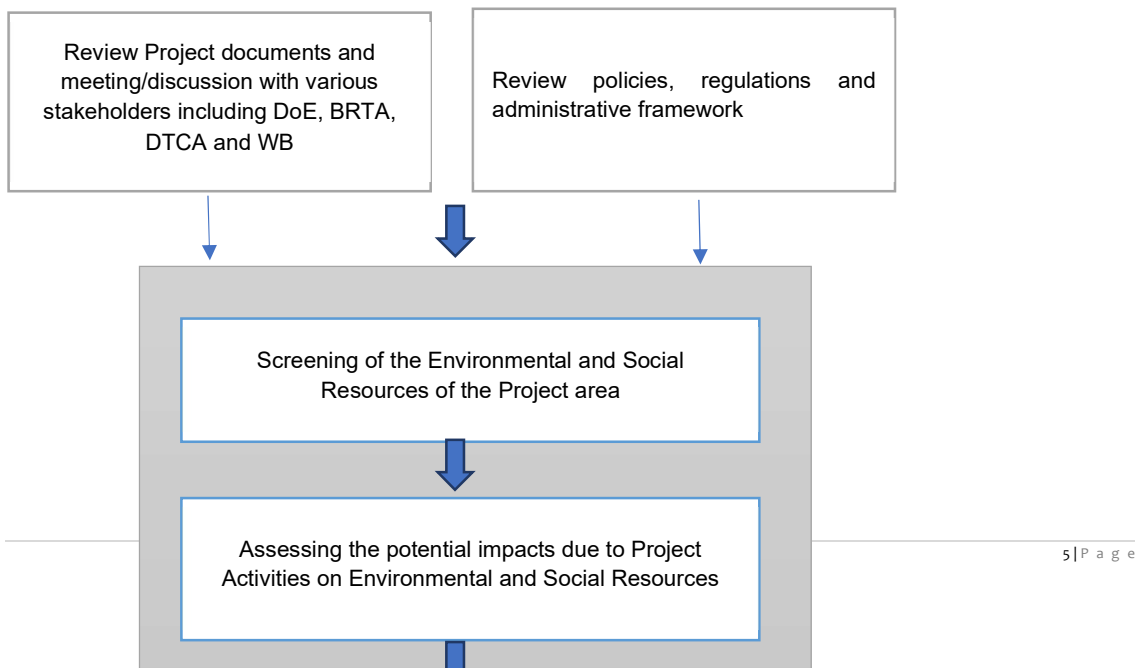


Figure 1: ESMF Preparation Approach

2 Project Description

2.1 Project Development Objective

The PDO is to strengthen air quality management and reduce emissions from the transport sector.

The indicators proposed to measure the achievement of the project's PDOs are: Number of enhanced systems for air quality management, (b) access to real-time (or timely) air quality information (Number), (c) PM_{2.5} emission reductions in the transport sector (Metric ton), (d) Continuous air monitoring stations (CAMS) or other calibrated monitoring devices (Number), (e) vehicle inspection centers in operation (Number), (f) E-buses procured and operational (Number).

2.2 Project Components and Subcomponents

Based on an airshed approach, the proposed Project will focus on: (i) strengthening capacity beyond MoEFCC and DoE for effective AQM, including through collaboration across GoB agencies and within IGP-HF region, and (ii) incentivizing emissions reductions from the transport sector. Component 1 will support the GoB (i) strengthening its analytical, monitoring and enforcement capacity for AQM, and (ii) adopting more efficient AQM policies, such as fiscal instruments and awareness campaigns. Enhanced monitoring and enforcement, combined with citizens' increased access to information, will incentivize emitters to comply with regulations. This is expected to increase demand for technical and financial assistance to be potentially financed in BCAP Phase 2. Additionally, as transboundary cooperation is necessary to meet air pollution targets in a cost-effective manner, Component 1 will also promote Bangladesh's participation in the Regional AQM Program for the IGP-HF countries. In Component 2, BRTA and DTCA will implement targeted measures to mitigate air pollution from vehicular emissions, while improving urban mobility in critical areas of Dhaka. The activities include (a) the expansion and improvement of vehicle inspection services; (b) introduction of franchise-based bus services and e-bus infrastructure to streamline public transportation, reducing traffic congestion and number of older, high-emitting vehicles on the road, and (c) establishing Intelligent Transport Systems (ITS) to facilitate efficient ticketing, contract management, and information dissemination, encouraging the use of public transport.

The BCAP project encompasses two main components and following sub-components.

Component 1: Strengthening Air Quality Governance (Implementing Agencies: MoEFCC, DoE)

Subcomponent 1.1. Regulatory and Policy Development

Subcomponent 1.2. Institutional Capacity Development

Subcomponent 1.3. Continuous Emissions Monitoring Program (CEMP)

Subcomponent 1.4: Project Management

This component will support the GoB to reinforce its regulatory and institutional foundations for the achievement of its long-term vision of air quality. Accordingly, this component will finance (a) the development of regulations and policies, in-depth studies, training and other capacity building activities to support MoEFCC, DoE, NBR and LGD in fulfilling their AQM mandates; (b) capacity building and environmental infrastructure for DoE and key stakeholders on core competencies of AQM; (c) the operationalization of the Continuous Emissions Monitoring Program (CEMP) for major point sources of air pollution, and (d) project management of the DoE activities.

There is no likely construction work to be performed under component 1. Continuous Emissions Monitoring Program (CEMP) for major point sources of air pollution to be performed through installation of the devices at the stacks of the selected industrial units. Other than CEMP installation process and associated support structures, there is no other physical activities to be performed under component 1.

Component 2: Reducing Emissions from the Transport Sector (Implementing Agencies: MoRTB)

Sub-component 2.1 Vehicle Emission Control (Implementing Agency – BRTA)

Subcomponent 2.1.a Vehicle Inspection Centers
Subcomponent 2.1.b Technical Assistance
Subcomponent 2.1.c Project Management
Subcomponent 2.2: Bus Modernization Program (Implementing Agency: DTCA)
Subcomponent 2.2.a Capital and Operational Viability Gap Funding (VGF) for electric bus service
Subcomponent 2.2.b. Depot upgradation and power infrastructure
Subcomponent 2.2.c. Intelligent Transport Systems
Subcomponent 2.2.d. Institutional Strengthening, Capacity Building and Project Management for twin transition

In Component 2, BRTA and DTCA will implement targeted measures to mitigate air pollution from vehicular emissions, while improving urban mobility in critical areas of Dhaka. For this project, implementation will be phased to ensure stakeholder buy-in in the reformed bus operations framework. The first half of the project will focus on advancing no-regret infrastructure components, including vehicle inspection centers and depot upgrades. In parallel, the Government will advance the DTCA reform on franchise-based bus services, so that, in the second half, it can proceed with the implementation of the first cluster. This phased approach will allow for the necessary institutional and regulatory groundwork to be established while progressing with the infrastructure.

This subcomponent will support the establishment of six VICs and upgradation of four existing non-functional VICs. The proposed VICs will perform mandatory safety and emission inspections of in-use vehicles at the time of issuing and reissuing the fitness certificates of such vehicles. Learning from the Mirpur VIC experience, international green building standards will be followed to ensure that these new BRTA infrastructure are climate proof and energy efficient and can be operated under all-weather conditions. Under the PPP arrangement, BRTA will develop physical infrastructure and utility connections, procure and install vehicle testing and IT equipment and information management systems, prescribe technical parameters for each inspection item, and direct targeted vehicles to these centers for inspection. Private operators will mobilize technicians (including female technicians as appropriate), perform inspection, submit inspection results to BRTA, and issue inspection certificates according to BRTA regulations. This subcomponent will also support BRTA to procure and operate 60 sets of vehicle emission testing equipment. This will enable BRTA's district offices, divisional office and mobile courts which currently perform visual inspection, to perform their emission inspection tasks with advanced equipment.

This sub-component will support the DTCA's bus modernization program in Dhaka, which aims to transform the existing poor-quality, unreliable, and old diesel-based bus services into modern, high-quality, and electric bus services. This shift is expected to reduce the emission intensity of public transport services while also attracting users from private vehicles such as cars, two-wheelers, and three-wheelers, thereby reducing overall emissions. This sub-component will also finance the enabling infrastructure and services as well as the capacity building needed for the IA.

This subcomponent will cover development of enabling civil and power infrastructure at 3-4 depots, needed for parking, charging and maintenance of e-buses. The depot locations are to be developed as green and resilient facilities through selection of materials and green features to reduce life-cycle emission from these structures. This will also be developed as inclusive facilities considering the needs of women users besides men. Government owned land parcels have been pre-identified for the depots including greenfield sites as well as existing BRTC depots which can be refurbished and used for e-buses. The depots will include establishment of infrastructure for bus parking, washing, maintenance, office space, affluent treatment plant, fire-fighting system and power infrastructure including connection to high-tension power, stepdown transformers, charging stations and other miscellaneous items.

Establishment of six VICs and upgradation of four existing non-functional VICs associated to major physical and construction activities. Development of enabling civil and power infrastructure at 3-4 depots, the depots will include establishment of infrastructure for bus parking, washing, maintenance, office space, affluent

treatment plant, fire-fighting system and power infrastructure including connection to high-tension power, stepdown transformers, charging stations and other miscellaneous items.

Error! Reference source not found. provides the subproject activities of each component of the BCAP project.

A negative list of subprojects will be excluded from project financing including subprojects and activities that have the following features/characteristics:

1. Subprojects and activities that are screened to have high risk and/or category A type;
2. Subprojects and activities that will involve forced labor, child labor, or other harmful or exploitative forms of labor;
3. Subprojects and activities that will have adverse, significant and irreversible impacts on natural and critical habitats;
4. Subprojects and activities that will have adverse, significant and irreversible impacts on cultural heritage;
5. Subprojects and activities that require obtaining free and prior informed consent (FPIC) from the SECs;
6. Subprojects and activities which, when being carried out, would affect, or involve the use of, water of rivers or of other bodies of water (or their tributaries) which flow through or are bordered by countries other than the Borrower/Recipient;
7. Any large and complex nature subproject, that is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment (e.g., due to accidents, toxic waste disposal, etc.).

2.3 Project Beneficiaries

The project beneficiaries include the population currently affected by air pollution sources targeted by the project, bus users in Dhaka that will access better services, participating government agencies, and private investors. Direct private sector beneficiaries will consist of companies receiving partial grants for installing CEMS; firms that will operate the new VICs, and those involved in the franchise-based bus services. Public beneficiaries will include staff from MoEFCC, DoE, BRTA, DTCA, BRTC, the National Board Revenues (NBR) and the Local Government Division (LGD). Project-recruited employees will gain stable jobs with social security benefits, while improved working conditions will enhance occupational health and safety. Families of these workers, particularly women, will benefit from better job opportunities and reduced pollution levels. Additionally, officials from national and local governments will receive support through technical assistance and capacity-building activities.

2.4 Potential Project Locations

The Bangladesh Clean Air Project aims to address air quality issues across Bangladesh. The project will target areas with high levels of air pollution which suffer from air pollution due to industrial activities, vehicular emissions, and other urban sources. Cities face significant air pollution challenges due to high population density, heavy traffic, and industrial activities etc. The project activities will cover at different geographical area of Bangladesh. Location of CEMPs are not decided. For constructing 5 VICs, 5 potential districts are preliminary proposed at Mymensingh, Noakhali, Faridpur, Comilla, and Rangamati and improving 4 existing ones at Dhaka, Chattogram, Khulna and Rajshahi). However, these sites may be changed because of the accessibility and technical requirement. Location of bus depots to be developed are also not yet decided. There is the possibility of the presence of small, ethnic, and vulnerable communities in the project areas especially component 2 under BRTA, VIC center at Rangamati (if site is technically feasible).

Most of the activities will be in the existing premises, urban and peri-urban areas which are already disturbed. So, the project activities are not expected to affect any biodiversity or habitat. Areas of intervention will include mostly plain lands with sparse vegetation and growth—common to the average countrywide social and environmental representations. The project is not likely to affect any cultural heritage. Subprojects with adverse impacts on cultural heritage will be excluded from project financing.

3 LEGAL AND REGULATORY FRAMEWORK

The national legislative, legal, and regulatory framework pertinent to the ES components of the BCAP project is reviewed in this chapter. Additionally, the ESF and ESSs of WB have also been discussed.

3.1 Review of National Legislations and Treaties

3.1.1 Relevant National Legislations

All relevant national policies, strategies, plans, acts, rules, and regulations laid out by the GoB pertaining to the environment and social aspects are briefly discussed in **Table 1**. It simply enumerates some of the most significant applicable major GoB statutes, rules, and regulations along with their significance to the proposed BCAP project sub-component of the DoE, BRTA, and DTCA.

Table 1: List of Relevant Environmental and Social Regulations of GoB

S/N		Key Provisions	Relevance to BCAP
1.	Bangladesh ECA 1995	According to this act (Section 12), no industrial unit or project shall be established or undertaken without obtaining, in a manner prescribed by the accompanying Rules, an Environmental Clearance Certificate (ECC) from the Director-General of DoE.	Applicable, ECC is required for the BCAP project under Component 1 (CEMPs), Component 2 (VIC centers construction under BRTA and renovation of bus depots under DTCA) and PIUs of DoE, BRTA, DTCA under component 1 &2 is responsible for get approval of the ECC from the DoE.
2.	Bangladesh Environmental Conservation Rules (ECR), 2023	Rule 5 classifies industrial units and projects into four categories depending on environmental impact and location for the purpose of issuance of ECC. These categories are Green, Yellow, Orange, and Red. The ECR'2023 describes the procedures for obtaining ECC from the DoE for different types of proposed units or projects.	Applicable, due to the planned project interventions and the nature of activities, i.e. Component 1 (CEMPs), Component 2 (VIC centers construction under BRTA and renovation of bus depots under DTCA), the BCAP project can be primarily categorized as Red by DoE. So, ESIA and ESMP will have to be approved by the DoE prior to depositing prescribed fees under Schedule 13 for the attainment of ECC and get renewal accordingly.
3.	Biodiversity Act, 2017	It provides for the creation of the National Committee and the Biodiversity Management and Surveillance Committees at local levels (i.e. Districts, Upazilas, Municipalities, and Unions). In general, all these committees are mandated to assist the Government in implementing the National Biodiversity Strategy and Action Plan (NBSAP) and to visit the biodiversity enriched areas in their respective territories; and monitor the progress of implementation of the NBSAP.	ESS6 is not relevant to the project. However, impact of the sub-projects on the surrounding biodiversity will be reassessed during implementation. Under the component-1 and component-2, during construction of VICs and renovation of bus depots, the PIUs of concern agency need to consult with existing committees.
4.	Bangladesh National Building Code, 2006	The BNBC clearly sets out the constructional responsibilities according to which the relevant authority of a particular construction site shall adopt some precautionary measures to ensure the safety of the workmen. The Code also clarifies the issue of the safety of workmen during construction.	Yes, the proposed project will include construction of different types of infrastructure, e.g., (a) construction of VIC centers; (b) renovation of bus depots. The designs of the construction activities must follow the specification of the building code to ensure structural integrity.
5.	The Noise Pollution Control Rules, 2006	The Noise Pollution Control Rules have been established to manage noise-generating activities which have the potential to impact the health and wellbeing of workers and the surrounding communities.	Applicable since minor to moderate noise emission is expected from project activity during construction phase under the component 1, and component 2.
6.	Constitutional Rights of the Tribal People	The Constitution of Bangladesh ensures affirmative action for small, ethnic, and vulnerable communities and prohibits discrimination inter alia on the grounds of race, religion, or place of birth, Article 23A of which provides, “the State shall take steps to protect and develop the unique local culture and tradition of the tribes, minor races, ethnic sects, and communities.” It also spells out in Article 28 (4), “nothing in this Article shall prevent the State from making special provision in favor of women or children or for the advancement of any backward section of citizens.”	Applicable, under the component 2, construction of VIC at Rangamati (if technical feasible), there is a possibility of the tribal community being affected due to the project activities.

S/N		Key Provisions	Relevance to BCAP
7.	Bangladesh Labor Act, 2006	It provides the guidance of the employer's extent of responsibility and workmen's extent of the right to get compensation in case of injury by accident while working.	Applicable during construction phase of the project components. The PIUs (DoE, BRTA, DTCA) will ensure through its contractors that basic amenities are provided to the labors. Project proponent through its contractors should also ensure all vendors employed should have valid labor license. Compensation to workers (own and vendors) should not be below daily wage rate as specified by Government. Employee ID card must be issued (own and vendors). Safety, health and welfare measures of building and construction workers as mentioned in the act needs to be complied with.
8.	Acquisition and Requisition of Immovable Property Act, 2017	The principal legal instrument governing land acquisition in Bangladesh is the Acquisition and Requisition of Immovable Property.	Applicable. Even though component 2 (VIC centers initially proposed for feasibility test at Sylhet, Rangpur, Mymensingh, Comilla, Faridpur, Noakhali and Rangamati) will be undertaken in the existing premises of BRTA, Component 1 under DoE which broader locations are not final yet, may require land acquisition for some of its planned infrastructure.
9.	Road Transport Act 2018 (Proposed amendment 2021)	<p>The Road Transport Act 2018 (Proposed amendment 2021) formulated the provisions for mitigating pollution from vehicle emissions. Overall, this act suggested establishment of vehicular emission standard in the line of Environment Conservation Act 1995 and its subsequent rules. The act also prohibits the operation of vehicles causing over standard emissions. The main features of the act related to vehicular pollution control (section 46) are given below:</p> <ul style="list-style-type: none"> • Government can formulate the emission standard for vehicle maintaining the consistency with Environment Conservation Act 1995 and subsequent rules. • Any vehicle with over standard emission cannot be operated on the road. • Any vehicle cannot use any parts or equipment, which cause environmental pollution. • It is prohibited to operate or to provide approval of operation any faulty, risky, unfit and or banned vehicles on roads and highways. 	Yes, this Act is applicable under the Component 2 setting up VICs at different locations and renovation of bus 3-4 bus depots at selected locations. The project will need to comply with the requirement as stated in the Act.
10.	Air Pollution Control Rules 2021	The Air Pollution Control Rules 2021 is prepared by mostly accommodating the previously prepared Draft Clean Air Act 2017. In case of vehicular emission, this rule set the emission standards more explicitly for passenger car, light commercial car, heavy duty vehicle, motorcycle, three-wheelers, and in-use motor vehicle (spark ignition engine, compression ignition engine,	Applicable since minor to moderate air emission is expected from the construction phases under Component 2 construction and operations of VIC centers and renovation of bus depots

S/N		Key Provisions	Relevance to BCAP
		motorcycle, and three-wheelers). This rule established emission standards for carbon monoxide, hydrocarbon, oxides of nitrogen, and particulate matter for both petrol and diesel operated engines. Moreover, the rules set separate emission standards for new and in-use vehicles. Since this rule contain the most updated emission standard and measuring instructions in the country, it will be used as governing rules for vehicular pollution control once the rules is finalized.	
11.	National Women Policy, 2011	The policy aims at ensuring human rights and fundamental freedom of women ensuring the active role of women and their equal rights in all the national economic activity and elimination of all forms of abuse against women.	Applicable, PIUs (DoE, BRTA, and DTCA) will ensure compliance. Women will play important roles in this project.
12.	National Health Policy, 2019	We are ensuring quality healthcare facilities to everyone (including emergency health care), exclusively to the rural communities, without any discrimination on the basis of gender and economic status.	Applicable, PIUs (DoE, BRTA, and DTCA) will ensure compliance. People will be engaged directly with this project as both Project Affected Persons (PAPs) and workers. Their health issues are one of many key issues in consideration during the project implementation.
13.	Child Labor Elimination Policy, 2010	The main objectives of the policy are as follows: They are withdrawing working children from different forms of occupations, e.g., hazardous work and the worst forms of child labor; Providing special emphasis for indigenous and physically challenged children to bring them back to the congenial environment; Planning and implementing different short-, medium-, and long-term strategies and programs to eliminate various forms of child labor.	Yes, PIUs (DoE, BRTA, and DTCA) should ensure that no child labor will be engaged at site for construction or operation works either directly or by the sub-contractors. PIUs should include a clause in the subcontractor agreements prohibiting employment of child labor.
14.	Rights & Protection of Persons with Disabilities Act, 2013	Deals with disability issues from a human rights perspective and covers people with disabilities based on their impairments. Protection of people with disabilities from violence, abuse, and discrimination, as well as establishing their rights and freedoms.	Applicable, PIUs (DoE, BRTA, and DTCA) will ensure compliance
15.	Women and Children Repression Prevention Act, 2010	It addresses the physical, psychological, sexual, and economic abuses women face and aims to provide medical and legal services to the victims and assisting them in seeking shelter and rehabilitation.	Applicable. Women and children are identified in this project as PAP or as labor. In case of handling any situation that originated from GBV, this act has relevance with the project. PIUs (DoE, BRTA, and DTCA) will ensure compliance.
16.	Public Procurement Rule 2008	This rule applies to the Procurement of Goods, Works or Services by any government, semi-government or any statutory body established under any law. The Public Procurement Rule 2008 requires contractors to take all reasonable steps to: (i) safeguard the health and safety of all workers working on site and other persons authorized to be in it; (ii) to keep the site in an	Applicable for all the components (1-4). DoE, BRTA, and DTCA should follow the Public Procurement Rules 2008 while procuring any kind of Goods, Works or Services under the BCAP project.

S/N		Key Provisions	Relevance to BCAP
		orderly state; and (iii) to protect the environment on and off the site; to avoid damage or nuisance to persons or to property of the public or others resulting from pollution, noise or other causes arising as a consequence of the Contractors methods of operation.	

pollution control, biodiversity conservation, and climate change, including the Ramsar Convention, the Bonn Convention on Migratory Birds, the Rio de Janeiro Convention on Biodiversity Conservation, and the Kyoto Protocol on Climate Change. An overview of the relevant international treaties signed by GoB is shown in **Table 2**.

Table 2: Relevant International Treaty or Conventions and the Responsible Agency

International Policy	Year	Description
Convention of Biological Diversity	1993	EIA must be introduced to any proposed development projects that are likely to have significant adverse effects on biodiversity, with a view to avoiding or minimizing such effects, and where applicable allow for public participation in such procedures; Appropriate arrangements must be introduced to ensure that environmental consequences of its programs and policies, that are likely to have significant adverse impacts on biodiversity, are duly taken into account; Bangladesh is obliged as a contracting party to provide EIA of projects that are likely to have significant adverse effects on biological diversity (art. 4).
International Plant Protection Convention	1951	This convention was arranged at Rome in 1951. Bangladesh has ratified this convention. Under the convention, Bangladesh has to secure actions to prevent the introduction of plants pests from project work or construction materials, and to promote appropriate measures for their control. It is governed by the Commission on Phyto-sanitary measures, which adopts international standards of this measure.
Ramsar Convention (Convention on Wetlands of International Importance especially as Waterfowl Habitat)	1971	There are 127 Parties with 1085 wetland sites designated as Wetlands of International Importance. This is an intergovernmental treaty, which provides direction for the conservation and wise use of all wetlands and wetland habitats through local, regional, and national actions and international cooperation. The Convention includes marine wetlands (wetlands up to a depth of six meters at low tide), islands, lakes, and rivers.
UN Framework Convention on Climate Change (UNFCCC)	1992	UNFCCC sets out a legal framework for stabilizing atmospheric concentrations of GHGs to avoid “dangerous anthropogenic interference with the climate system”. Together with mitigation, adaptation and loss and damage have been adopted as policy planks to address climate change and its impacts. Because of her disadvantaged geographical location, Bangladesh is regarded as one of the most vulnerable countries in the world.

Except the treaties related to climate change (e.g. UNFCCC), none of the above agreements are linked to project development or operation due to the nature and location of BCAP. In compliance with the requirement of UNFCCC, BCAP will be designed, constructed and operated with consideration to reduction in GHG emissions and that all infrastructure be built as climate resilient.

3.2 World Bank’s Environmental and Social Framework (ESF)

Since October 2018, all WB-funded Investment Project Financing (IPF) are required to follow the ESF consisting of ten (10) ESSs. These ESSs set out their requirement for the DoE, BRTA, and DTCA’s identification and assessment of environmental and social risks and impacts associated with any project. The ESSs support the DoE, BRTA, and DTCA’s in achieving good international practice relating to ES sustainability, assist them in fulfilling their national and international ES obligations, enhance transparency and accountability and ensure sustainable development outcomes through ongoing stakeholder engagement. **Table 3** summarize

Table 3: ESS Requirements and Relevance to BCAP Project Activities

WB ESS Policies, Standards, Directives	Objectives	Requirements	Extent of Relevance to the sub-projects/project
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	Identify, assess, evaluate, and manage environmental and social risks and impacts in a manner consistent with the ESF. Adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities.	PIUs to develop an ESMF, LMP, SEP, SEA/SH Action Plan, and ESCP during preparation stage and site specific ESIA along with ESMP at implementation stage before processing of subprojects at all levels of the governmental organizations.	<p>Relevant. The proposed project’s risk has been rated as ‘substantial’ for the following activities: (b) Construction and operations of VIC centers; (c) renovation and operations of bus depots. Environmental risks and impacts related to the proposed project investments are largely construction, operation and maintenance (O&M) related, reversible, and localized, and for which known engineering, technical and housekeeping measures are available and can be developed and implemented. Similarly, the small-scale construction of new VICs can have short-term localized negative impacts during the construction works.</p> <p>All these investment activities would be carried out on existing facilities of DoE, BRTA, and DTCA, as well as on acquired land from private entities.</p> <p>To comply with the ESMF, ESIA and ESMP will be prepared where required.</p>
ESS 2 Labor and Working Conditions	Promote safety and health at work. Promote fair treatment, non-discrimination, and equal opportunity for project workers. Protect project workers, with particular emphasis on vulnerable workers. Prevent the use of all forms of forced labor and child labor. Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. Provide project workers with accessible means to raise workplace concerns.	Requirements for the Borrower to prepare and adopt labor management procedures covering the SEA/SH issues. Provisions on the treatment of direct, contracted, community, and primary supply workers and government civil servants. Requirements on terms and conditions of work, non-discrimination, and equal opportunity and worker’s organizations. Provisions on child labor and forced labor. Requirements on occupational health and safety, in keeping with the World Bank Group (WBG’s) Environmental, Health, and Safety Guidelines.	<p>Relevant. During the construction and operation of VIC centers; and renovation and operation of bus depots, the project will involve the employment of direct workers and contracted workers.</p> <p>The project has incorporated Labor Management Procedure-related issues in the ESMF incorporating SEA/SH-related issues, which also covers the issues and concerns of laborers and workers employed/likely to be employed by the PIUs.</p>

WB ESS Policies, Standards, Directives	Objectives	Requirements	Extent of Relevance to the sub-projects/project
ESS 3 Resource Efficiency and Pollution Prevention and Management	Promote the sustainable use of resources, including energy, water, and raw materials. Avoid or minimize adverse impacts on human health and the environment caused by pollution from project activities. Avoid or minimize project-related emissions of short and long-lived climate pollutants. Avoid or minimize the generation of hazardous and non-hazardous waste. Minimize and manage the risks and impacts associated with pesticide use. Requires technically and financially feasible measures to improve efficient consumption of energy, water, and raw materials and introduces specific requirements for water efficiency where a project has high water demand.	<p>With respect to Resource Efficiency, the project preparation and the ESMF process will identify feasible measures for efficient (a) energy use; (b) water usage and management to minimize water usage during construction, conservation measures to offset total construction water demand and maintain balance for the demand of water resources; and (c) raw materials use by exploring the use of local materials, recycled aggregates, use of innovative technology so as to minimize project's foot prints on finite natural resources.</p> <p>Requires an estimate of gross greenhouse gas emissions resulting from project (unless minor), was technically and financially feasible. Requirements on the management of wastes, chemical and hazardous materials, and contains provisions to address historical pollution. ESS 3 refers to national law and good International Industry Practices.</p>	<p>Relevant. The project activities will promote RECP technologies and implement pollution control investments, implementation of VICs and renovation/ of bus depots.</p> <p>With respect to Resource Efficiency, the site specific ESMP will identify feasible measures for efficient (a) energy use; (b) water usage and management to minimize water usage during construction.</p>
ESS 4 Community Health and Safety	Anticipate or avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from routine and non-routine circumstances. Promote quality, safety, and climate change considerations in infrastructure design and construction, including dams. Avoid or minimize community exposure to project-related traffic and road safety risks, diseases, and hazardous materials. Have in place	<p>Requirements on infrastructure, considering safety and climate change and applying the concept of universal access, where technically and financially feasible. Requirements on traffic and road safety, including road safety assessments and monitoring, and SEA/SH-related issues.</p> <p>Addresses risks arising from impacts on provisioning and regulating ecosystem service. Measures to avoid or minimize the risk of water-</p>	Relevant. CEMPs installation, construction of VIC centers; and renovation of bus depots, may expose communities to health and safety risks, especially those communities that are immediately close to the project facilities. The transportation of construction, materials may create mitigable negative impact on the community. Similarly, labour employed during the construction phase, may affect the local community, and SEA/SH-related issues. Infectious and communicable disease is another concern for the communities adjacent to project facilities.

WB ESS Policies, Standards, Directives	Objectives	Requirements	Extent of Relevance to the sub-projects/project
	effective measures to address emergency events. Ensure that safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.	related, communicable, and non-communicable diseases. Requirements to assess risks associated with security personnel and review and report unlawful and abusive acts to relevant authorities.	Hence, community health and safety measures will be prepared, adopted, and implemented under the project addressing community health and safety issues. Further, a GRM will also be enacted to address issues with grievances by all stakeholders and will be included in the ESCP.
ESS 5 Land Acquisition Restrictions on Land Use and Involuntary Resettlement	Avoid or minimize involuntary resettlement by exploring project design alternatives. Avoid forced eviction. Mitigate unavoidable adverse impacts from the land acquisition or restrictions on land use by providing compensation at replacement cost and assisting displaced persons in their efforts to improve, or at least restore, livelihoods and living standards to pre displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. Improve living conditions of poor or vulnerable persons who are physically displaced through the provision of adequate housing, access to services and facilities, and security of tenure. Conceive and execute resettlement activities as sustainable development programs.	Applies to permanent or temporary physical and economic displacement resulting from different types of land acquisition and restrictions on access. Provides criteria for “voluntary” land donations, sale of community land, and parties obtaining income from illegal rentals. Prohibits forced eviction (removal against the will of affected people, without legal and other protection including all applicable procedures and principles in ESS 5). Requires that acquisition of land and assets happens only after payment of compensation and resettlement has occurred. Requires community engagement and consultation, disclosure of information, and a grievance mechanism.	Relevant. The project may require land acquisition and thus would cause impacts on livelihood and living. A Resettlement Policy Framework (RPF) will be developed before negotiations to guide development of site-specific RAPs and Abbreviated Resettlement Action Plan (A-RAP) to address the land acquisition issue mentioned.
ESS 6 Biodiversity Conservation	Protect and conserve biodiversity and habitats. Apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources.	Requirements for projects affecting areas that are legally protected designated for protection or regionally/internationally recognized to be of high biodiversity value. Requirements on sustainable management of living natural resources, including primary production, and harvesting, distinguishing between small scale and commercial activities. Requirements	Not relevant for BCAP, as most of the activities will be in the existing premises, urban and peri-urban areas which are already disturbed. So, the project activities are not expected to affect any biodiversity or habitat.

WB ESS Policies, Standards, Directives	Objectives	Requirements	Extent of Relevance to the sub-projects/project
		relating to primary suppliers, where a project is purchasing natural resource commodities, including food, timber, and fiber.	
ESS 7 Indigenous Peoples	Ensure that the development process fosters full respect for affected parties' human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods. Promote sustainable development benefits and opportunities in a manner that is accessible, culturally appropriate, and inclusive. Improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with affected parties. Obtain the Free, Prior, and Informed Consent (FPIC) of affected parties in three circumstances. Recognize, respect, and preserve the culture, knowledge, and practices of Indigenous Peoples (IP), and provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.	Applies when the Indigenous People are present or have a collective attachment to the land, whether they are affected positively or negatively and regardless of economic, political, or social vulnerability—the option to use different terminologies for groups that meet the criteria set out in the Standard. The use of national screening processes, providing these meet WB criteria and requirements. Coverage of forest dwellers, hunter-gatherers, and pastoralists, and other nomadic groups. Requirements for meaningful consultation tailored to affected parties and a grievance mechanism. Requirements for a process of free, prior, and informed consent in three circumstances.	Relevant. There is the possibility of the presence of small, ethnic, and vulnerable communities in the project areas especially component 2 under BCAP, VIC center at Rangamati (if site is technical feasible), whose presence and scale will be assessed during the social assessment, including the risk and impacts of the project activities on these communities. A separate SECDPF will be prepared to address issues of the ethnic minorities whose presence will be determined through screening. Any activity requiring FPIC will not be approved.
ESS 8 Cultural Heritage	Protect cultural heritage from the adverse impacts of project activities and support its preservation—Address cultural heritage as an integral aspect of sustainable development. Promote meaningful consultation with stakeholders regarding cultural heritage. Promote the equitable sharing of benefits from the use of cultural heritage.	Requires a chance finds procedure to be established. Recognition of the need to ensure peoples' continued access to culturally important sites, as well as the need for confidentiality when revealing information about cultural heritage assets that would compromise or jeopardize their safety or integrity. Requirement for fair and equitable sharing of benefits from the commercial use of	Not Relevant. The project is not likely to affect any cultural heritage. Subprojects with adverse impacts on cultural heritage will be excluded from project financing.

WB ESS Policies, Standards, Directives	Objectives	Requirements	Extent of Relevance to the sub-projects/project
		cultural resources. Provisions of archaeological sites and materials, built heritage, natural features with cultural significance, and moveable cultural heritage.	
ESS 9 Financial Intermediaries	Sets out how Financial Intermediaries (FI) will assess and manage ES risks and impacts associated with the subprojects it finances. Promote good ES management practices in the subprojects which the FI finances. Promote good environmental and sound human resources management within the FI.	FIs to have an ESMS, a system for identifying, assessing, managing, and monitoring the ES risks and impacts of FI subprojects on an ongoing basis. FI to develop a categorization system for all subprojects, with special provisions for subprojects categorized as high or substantial risk. FI borrowers to conduct stakeholder engagement in a manner proportionate to the risks and impacts of the FI subprojects.	Not relevant.
ESS 10 Stakeholder Engagement and Information Disclosure	Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them. Assess stakeholder interest and support for the project and enable stakeholders' views to be considered in project design. Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle. Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner.	Requires stakeholder engagement throughout the project life cycle and preparation and implementation of a SEP covering SEA/SH-related issues. Requires early identification of stakeholders, both project-affected parties and other interested parties, and clarification on how effective engagement takes place. Stakeholder engagement to be conducted in a manner proportionate to the nature, scale, risks, and impacts of the project and appropriate to stakeholders' interests. Specifies what is required for information disclosure and to achieve meaningful consultation.	Relevant. Each of the three different PIUs at the DoE, BRTA, and DTCA has its own agenda and scope to implement various subprojects. A SEP has been developed for all the PIUs to illustrate various stakeholders and ways to engage them and close the feedback loop. It also covered the SEA/SH-related issues. The Stakeholder Engagement Plan has detailed different GRM and grievance redress committees for the PIUs to address issues and concerns for the project.

3.3 Classification of the Project According to the Environment Conservation Rules (ECR) and Requirement for Environmental Clearance Certificate (ECC)

The legislations relevant for environmental assessment for BCAP components are the ECA 1995 and the ECR 2023. In order to set an illustrative directive for abiding by the act, Bangladesh Government through the ECR 2023 and its subsequent amendments, as specified in rule (5) lists the different types of industrial projects into four categories namely, Green, Yellow, Orange, or Red, based on severity of its potential environmental impacts. Environmental clearance can be granted at various tiers depending on the category of project to which an industrial activity belongs. The procedure and required documents for obtaining environmental clearance in favor of each category have also been presented by the DoE. As part of a government entity, DoE, BRTA, and DTCA of the BCAP project is obliged to abide by all these acts and rules, in addition of other GoB acts, rules or guidelines.

In ECR-23, there is no clear indication about the categorization of the proposed project components because those are not enlisted in the DoE project categorization list. The environmental impacts vary from one component to another components. However, considering the integrated adverse impacts of the project due to planned activities and nature of the activities, primarily this project can be categorized as Orange and or Red as per ECR-2023. Prior to the project implementation, the categorization can be finalized with the discussion of the DoE. ESIA will be required for VICs Centers for BRTA and renovation of bus depots for DTCA. It is the responsibility of the PIUs i.e. DoE, BRTA, and DTCA to conduct ESIA in accordance with the ESMF and get ECC from DoE. ESIA study and Environment clearance will be obtained by the respective PIU of DoE, BRTA and DTCA from the DG, DoE.

The environmental clearance procedure for Orange and Red Category projects can be summarized as follows:

Application to DoE → Obtaining Site Clearance → Applying for Environmental Clearance → Obtaining Environmental Clearance → Clearance Subject to Annual Renewal.

3.4 Gap Analysis of World Bank Requirements and National Laws

A gap analysis (Annex 1) between WB's ESSs and GoB Regulations was conducted as part of the BCAP ES capacity assessment in light of the *Overview Assessment of Bangladesh's Country Framework for Addressing Environmental Risks and Impacts of Development Projects (September 2021)*.

4 IDENTIFICATION OF POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

4.1 Impact Assessment and Prediction

4.1.1 Potential ES Risks and Impacts

The construction and operation of VICs, the renovation and operation of bus depots, construction of temporary support structure for the installation of the CEMPs devices at the stacks of the selected industries and operation of CEMPs at height, renovation & relocation of CAMs, installation of a few strategic stations and/or instruments and other risks and repercussions are mainly associated with the proposed project investments. A serious issue of scrap/waste management due to replacement of the old buses to bus modernization through electric buses and replacement of huge battery after five years of the project operation.

During the construction phase, the project will impact environmental quality, including air, noise, water, and soil quality, due to various sources of waste, dust, wastewater, fumigate emission, and the leaching of oily substances into the soil. Such type of impacts is mainly localized in nature confined within a limited space and does not create any severe threat to the environment. Occupational health and safety are a key concern at different stages of the project, necessitating prioritization in designing interventions, such as increased accessibility in e-buses, safe access, and various OHS measures for operating AQM infrastructure. These impacts will be managed through efficient implementation of the Environmental and Social Management Plan (ESMP) as per relevant ESSs and strict adherence to occupational health and safety (OHS) protocols to ensure safe handling. However, any project intervention in any areas of environmental and ecological sensitivity and important ecosystem and with high environmental and social risk will be screened out during screening process.

The project's resource usage will mainly include raw materials, fuel, electricity, and water. To ensure effective resource utilization, ES evaluation and management plans at the subproject level will be prepared following screening. There is little chance that the project's operations will impact habitat, biodiversity, or living natural resources.

The overall environmental benefits of the project will significantly outweigh the drawbacks. These include a reduction of approximately 80% in PM and GHG emissions, decreased exposure to air pollution, decreased vehicle emissions due to the enforcement of emission standards, improved safety, and decreased accidents through fitness evaluation. Although the planned AQM infrastructure will have small environmental footprints, they will offer valuable air quality data that will support enforcement and compliance, both of which are anticipated to positively impact the environment. The air quality will improve due to the systematic operation and maintenance of bus depots, the use of electric vehicles, and the reduction of GHG emissions and traffic-induced emissions.

Environmental and Social Risk Classification (ESRC) of the BCAP has been primarily rated as 'Substantial'. Environmental and Social Assessment (ESA) study i.e. ESIA should further assess the exact depth of risks and impacts, based on the evidence, professional judgment and public consultations. A preliminary categorization of the project components/sub-components based on their ESA requirement is given in **Table 4** following the new WB ESF/10 ESSs.

SEA/SH-related risks are rated 'Moderate'. The risks relate to the limited capacity of the IAs to manage this kind of risk. The possible risks may include exposure of female workers to abuse and harassment by male peers, along with female e-bus users during their journey time. A compliant grievance management system and enforcement of a Code of Conduct for workers will be in place. A standalone SEA/SH risk mitigation plan will be prepared and disclosed within 60 days of project effectiveness, and salient features will be integrated into the POM.

The projected impacts of the BCAP project on the key ES parameters that have been identified as part of the ESMF are listed in **Table 5**, which has also been analyzed according to the ESS1 risk categories based on the significance of each impact. In the subsequent sections, these impacts are discussed, and guidelines for mitigation are included for the BCAP project's ESMF. The potential ES impacts and mitigating measures are given

in **Table 6**.

Table 4: Categorization of BCAP Activities Based on Key Predicted Impacts and ESS Requirements

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Risk Category	ESSs Requirement
Component 1: Strengthening air quality governance	1.1 Regulatory and Policy Development	Support MoEFCC/DoE, NBR and LGD in developing regulatory and policy reforms to strengthen overall AQM No physical activities under sub-component 1.1.	No physical activities under sub-component 1.1.	No physical activities under sub-component 1.1.	No environmental or social impacts are envisaged. Incentivize pollution reduction, improve compliance, complement DoE's enforcement efforts, and balance economic growth with environmental sustainability, developing (a) SOPs for safe operation of disposal sites, to eliminate uncontrolled waste burning; and (b) guidelines for clean construction sites and market study for developing economic value chains for construction and demolition waste.	N/A	Excluded from ES Assessment
	1.2 Institutional Capacity Development	-Along with project-supported regulatory and institutional development, this subcomponent will strengthen DoE's infrastructure and technical capacity to perform core competencies of AQM. Physical activities under component 1.2 will cover rehabilitation and relocation of existing CAMS as needed, (b) installation of a few strategic stations and/or instruments to cover all criteria pollutants stated in the APCR, rural areas and transboundary pollution.	Existing CAMs locations rural areas of the northern west of the country to address transboundary pollution.	Design is not finalized for the rehabilitation and renovation of the existing CAMs and installation of few instruments	Strengthen air quality monitoring network (AQMN) of DoE; Awareness building on critical topics of AQM – health impacts, good practices to control emissions, co benefits of investing in RECP	N/A	Excluded from ES Assessment

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Risk Category	ESSs Requirement
	1.3 Continuous Emissions Monitoring Program (CEMP)	Implementation of a continuous emissions monitoring program (CEMP) for real-time monitoring of major point sources of air pollution; Install and operate CEMS to analyze pollutants emitted from their production processes; Phased approach starting with the highest emitters of primary and secondary PM2.5: (a) power plants running on fossil fuel (>50MW thermal input); (b) facilities using boilers with >50MW thermal input; (c) refineries; (d) heavy industries in iron and steel, cement, and fertilizers production; (e) waste incinerators, among others. Physical activities under sub-component 1.3 include construction of temporary support structure for the installation of the CEMPs devices at the stacks of the selected industries located different areas and operation of CEMPs at height.	CEMPs devices to be installed at the stacks of the selected industries located different areas of the country	Installation process of CEMPs devices is not designed yet	Provide real-time monitoring of point sources (stacks); CEMP will allow immediate enforcement of emissions standards by DoE;	Moderate	E&S Screening, Integration of E&S requirements in the ToRs, ESIA, ESMP, LMP, OHS, GRM, C-ESMP
	1.4 Project Management	To set up a Project Implementation Unit (PIU) of DoE	No physical activities under component 1.4.	No physical activities under component 1.4.	No environmental or social impacts are envisaged To manage Component 1 activities under DoE	N/A	Excluded from ES Assessment
Component 2: Reducing Emissions from Transport Sector							
Component 2.1: Vehicle Emission Control	2.1.a Vehicle Inspection Centers	Support BRTA to pilot the development of new VICs through a PPP arrangement; and Perform mandatory safety and emission inspections of in-use vehicles. -Construction of four new VICs -Upgrades to four existing VICs -Rollout of 40 mobile VICs -Systems to support enforcement of VICs -To procure and operate 60 sets of vehicle emission testing equipment	Vehicle Inspection Centers: Location needs set criteria including entrance and exit for vehicles. A number of candidates sites have been proposed but exact criteria yet to be met. Will be done after appraisal.	Will not be done before appraisal	Component 2.1 will have potential ES impacts because of construction activities, impacts include, among others, <ul style="list-style-type: none"> Noise, vibration and Air pollution; Traffic congestion Land filling and soil contamination; Solid waste generation; Labor associated risk (Occupational and 	Substantial	E&S Screening, Integration of E&S requirements in the ToRs, ESIA, ESMP, LMP, SEP, OHS, GRM, SECDF, RPF, C-ESMP, SEA/SH Action Plan

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Risk Category	ESSs Requirement
					<p>Community health and safety including SEA/SH risk and</p> <ul style="list-style-type: none"> • Presence of ethnic communities and impact on them • SEA/SH-related risks <p>However, VICs will have beneficial impacts during its operation:</p> <ul style="list-style-type: none"> • Reduction of vehicular emission through enforcement of emission standards • Increased safety and accident reduction through fitness examination • Improvement of vehicular maintenance and reduction in fuel consumption • No hazardous materials involved 		
	2.1.b Technical Assistance	To enhance BRTA's capacity to manage vehicle inspections for safety and emission controls	No physical activities under component 2.1. b	No physical activities under component 1.4.	No environmental or social impacts are envisaged; -Develop capacity to manage vehicle inspection for both safety and emission control.	N/A	Excluded from ES Assessment
	2.1.c Project Management	To set up a Project Implementation Unit (PIU) of BRTA	No physical activities under component 2.1.c	No physical activities under component 1.4.	No environmental or social impacts are envisaged; To manage Component 2.1 activities under BRTA	N/A	Excluded from ES Assessment
2.2 Bus Modernization Program							
	2.2.a Capital and Operational Viability Gap Funding (VGF) for electric bus service	Building on DTCA's Bus Route Rationalization Plan, this subcomponent will support the introduction of e-bus services in Dhaka through a "single operator per franchise" system.	No physical activities under component 2.2.a	No physical activities under component 2.2. a	-No environmental or social impacts are envisaged; -Capacity building of the bus drivers, conductors and other operational staff on road safety, fuel efficiency, prevention of gender-based violence, Sexual	N/A	Excluded from ES Assessment

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Risk Category	ESSs Requirement
					Exploitation and Abuse/Sexual Harassment (SEA/SH) in public transport. Incentivize employment of women as conductors and bus operations staff.		
	2.2.b. Depot upgradation and power infrastructure	Development of enabling civil and power infrastructure at 3-4 depots, needed for parking, charging and maintenance of e-buses. The depot locations are to be developed as green and resilient facilities through selection of materials and green features to reduce life-cycle emission from these structures. This will also be developed as inclusive facilities considering the needs of women users besides men. Government owned land parcels have been pre-identified for the depots including greenfield sites as well as existing BRTC depots which can be refurbished and used for e-buses.	Development of ~3-4 depots (depends on feasibility) including civil infrastructure, chargers and electrical supply equipment. Location is not yet finalized.	Design is not done. Will not be done before appraisal	Component 2.2.b will have potential ES impacts because of construction activities, impacts include, among others, <ul style="list-style-type: none"> • Noise, vibration and Air pollution; • Land filling and soil contamination; • Solid waste generation; • Labor associated risk (Occupational and Community health and safety including SEA/SH risk and • Presence of ethnic communities and impact on them Bus modernization program will have beneficial impacts during its operation: <ul style="list-style-type: none"> • Significant reduction of vehicular emission through e-buses, • Systematic and smart operation facilities of bus depots will have positive impact on traffic circulation; • No hazardous materials involved • Waste generation from old buses (Scrap processed for the old buses and battery i.e.) • Generation of e-waste. 	Substantial	E&S Screening, Integration of E&S requirements in the ToRs, ESIA, ESMP, LMP, SEP, OHS, GRM, RPF, C-ESMP

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Risk Category	ESSs Requirement
	2.2.c. Intelligent Transport Systems	Establish the Intelligent Transport Systems (ITS) which will include Automatic Vehicle Locations Systems (AVLS), Automatic Fare Collection Systems (AFCS), Passenger Information System, Web Portal & Mobile Application, Bus Contract Management System, Data Centre (DC), Disaster Recovery Centre (DRC), Networking (Local Area Network), Operations Control Center (OCC), training & Capacity Building.	No physical activities under component 2.2.c	No physical activities under component 2.2.c	-No environmental or social impacts are envisaged. -Reporting facilities of gender-based violence in e-buses.	N/A	Excluded from ES Assessment
	2.2.d. Institutional Strengthening, Capacity Building and Project Management for twin transition	Technical assistance needed for institutional strengthening and capacity building of DTCA to transition to a public transport authority with the necessary service planning, contracting, performance management and other necessary capabilities.	No physical activities under component 2.2. d	No physical activities under component 2.2. d	-No environmental or social impacts are envisaged.	N/A	Excluded from ES Assessment

4.1.2 Potential Environmental and Social Impacts Related to Project Siting

Loss of natural vegetation, trees, land use change and drainage

All civil /infrastructure works i.e. construction of BRTAs VIC centers, development of DTCAs bus depots upon selection of the specific sites may require cutting of trees and removal of natural vegetation due to site clearance (clearing of the site so that it becomes accessible for further works), vegetation loss (mainly grass/shrubs but also possibly some trees). From the initial assessment it reveals that none of the sites are subjected to severe drainage and water logging issue. The drainage congestion and water logging including land use change will be further assessed in the ESIA report when the location and details information is available.

Impacts on vulnerable and disadvantage groups/communities/individuals

To address the gaps in women's employment in green growth-related jobs, the project will implement actions to increase women's recruitment. The project will support capacity building of the PIUs to (a) carry out targeted outreach, (b) improve working conditions by setting up mechanisms to report workplace sexual harassment, and (c) provide childcare support.

4.1.3 Potential Environmental and Social Impacts During Project Implementation

Air Pollution

The construction of BRTA VIC centers and DTCA bus depots at various sites may result in localized and transient air pollution from earthwork, vehicle movement, and machinery and equipment use. These operations are likely to produce localized air pollution, which impacts the immediate area around the emission source or project site. A large amount of particulate matter may be released during operation if construction equipment, such as a stone/brick (aggregate) crusher, is utilized on the site.

Water Pollution

Construction of the project activities may lead to both surface and groundwater pollution through runoff containing pollutants like spills, and debris, as well as through improper waste management and dewatering activities.

Noise Pollution

Noise pollution is anticipated to be caused by a variety of construction-related activities at BRTA VIC centers and DTCA Bus depots, such as the transportation of trucks bringing equipment and building materials to and from the site. The primary causes of noise during the building phase will be excavation, piling, site preparation, material and equipment handling and transportation, and other engineering tasks like welding, hammering, cutting, riveting, etc. The noise produced by the operation of concrete mixers, excavators, construction vehicles, fabrication, equipment and material handling, etc., would be significant. Both the local people and the workforce would be greatly impacted by this high level of noise. Particularly at risk from elevated noise levels are sensitive receptors found in locations like hospitals, schools, places of worship, and busy marketplaces. Sensitive receptors such as hospitals, schools, religious places, and crowded market areas are particularly vulnerable to increased noise levels.

Impacts of Land Filling (at new construction site)

It is necessary to fill in the land when BRTA VICs are being built. Potential effects of the planned civil works and building at new locations could include soil contamination from other sources. Landfilling operations must refrain from gathering topsoil from agricultural areas, illicit sand mining from riverbeds, and hill cuttings.

Soil Contamination

Due to construction activities, construction yards, worker camps, and other construction locations, the soils in the construction area and adjacent agricultural lands are susceptible to contamination. Soil contamination can also occur from the handling and storage of fuel and other building materials. In addition to posing safety and

health risks, improper handling, storage, and disposal of chemicals, fuels, and lubricants will negatively affect the quality of the soil.

Generation of Solid Waste

Solid waste generated during the construction phase includes construction wastes, excess construction materials such as sand and soil, faulty/damaged parts, metal scraps, cardboard boxes and containers, and cotton swaths from workshops, and domestic solid waste from construction offices and camps. In addition to the above, small quantities of hazardous waste may also be generated mainly from the vehicle and facility maintenance activities (liquid fuels; lubricants, hydraulic oils; chemicals, such as anti-freeze; contaminated soil; materials used to absorb oil and chemical spillages for spill control; machine/engine filter cartridges; oily rags, spent oils and filters, contaminated soil, sharps as in broken tools and others). Such trash must be disposed of properly to prevent negative effects on the environment, human health, and aesthetics. If these wastes are not disposed of properly, they can contaminate the land and water and pose health risks to livestock, aquatic and terrestrial animals, and local residents.

Site Clearance and Restoration

In addition to obstructing natural drainage, leftover building materials, debris, spoils, scraps, and other rubbish from workshops and camp sites after the end of construction activities may cause obstacles and encumbrance for the surrounding community.

Impact on labor, working conditions and labor risks

Both direct and contracted labor will be employed for the project. Except for experienced workers who might not be available in the program areas, most labor will be employed locally. However, unethical and discriminatory labor practices, OHS problems, and concerns of sexual harassment, sexual exploitation, and gender-based violence (GBV/SEA/SH) are examples of possible labor-related risks. Due diligence must be done in monitoring the risks related to child labor or forced labor. A separate LMP with labor GRM has been designed to address these difficulties. The GRM proposed for labor-related issues will address all kinds of grievances.

Gender and GBV/SEA/SH

The project's risk associated with GBV/SEA/SH has been rated as Moderate, as per the GBV/SEA/SH risk rating tool. GBV/SEA/SH risks can intensify within local communities when laborers are present at the construction sites during the construction period. The issues can be addressed by raising community awareness, sensitizing PIUs, training workers, signing a code of conduct (CoC), mapping GBV/SEA/SH service providers, and developing a GRM that can address GBV/SEA/SH issues.

Occupational Health and Safety (OHS)

Given the nature of civil work, the workers may subject to various construction related incidence including fire, electrocution, stuck by machines, fall, lack of PPE, lack of OHS related training etc. A risk hazard assessment must be carried out before commencing work, following the law of proportionality, by the Contractor. Contractors must engage a minimum of one safety representative. Smaller contracts may permit for the safety representative to carry out other assignments as well. The safety representative ensures the day-to-day compliance with specified safety measures and records of any incidents. Minor incidents shall be reported to respective PIUs on a monthly basis, serious incidents shall be reported immediately. Minor incidents will be reflected in the quarterly reports to the WB, major issues will be flagged to the WB immediately. The reporting criteria will follow ESCP guideline (notice within 24 hours of occurring) and the Contractor will carryout a Root Cause Analysis (RCA) as well as develop and implement a Safeguard Corrective Action Plan (SCAP) with the assistance of the repective PIU. The Contractor is required to follow international best practices on OHS (for example ILO OSH 2001 - Guidelines on occupational safety and health management systems, ILO Code of Practice Safety and Health in Construction 1991).

Impacts on Small, Ethnic, and Vulnerable Communities (Impacts on Indigenous People)

Small ethnic communities may be present in the subproject areas. However, the exact location of various activities (vehicle inspection centers, laboratory & CAMS) will confirm the presence of the ethnic minorities meeting the criteria of ESS7. If there any, they will be consulted as per their cultural and social norms the modalities of that have been detailed in the SECDPF which will be referred to in preparing the Small, Ethnic, and Vulnerable Community Development Plan (SEVCDP) as soon as the site location, presence of ethnic communities and the impact on them are known. The project activities will exclude any activities that warrant obtaining FPIC from SECs.

Impacts on Land Acquisition and Resettlement

Acquiring land for VICs and bus depots is a strong possibility. This may result in resettlement and impact the livelihood and living conditions of project-affected people. Most of the sites have been identified. One has been identified as having the requirement for a retrofitted RAP. The RPF will provide detailed guidelines to address this.

Impact on Cultural Heritage

Ongoing SE consultations will identify cultural heritage in collaboration with communities in project intervention areas. The project activities will exclude any activities that may significantly adversely impact cultural heritage.

4.1.4 Impact During Post-Project Operational Period

Reduce GHG Emission and Climate risks

Under component 1, at the policy level, the development of the Climate Change Act and associated rules and standards will help the GoB effectively integrate climate mitigation and adaptation actions into its development actions. The amendment of the ECA and associated rules and standards will help the GoB promote upstream interventions that can effectively reduce pollution including GHG from sources.

In addition, under component 2, by targeting reduction of emission from transport sector, instead of high emission vehicles using e-bus services and VICs will contribute to the Government's efforts to reduce GHG emissions from the transport sector. Moreover, all infrastructure developed under the project will be climate resilient to ensure sustainable operation of such facilities under a change in climate.

Air Pollution

Both directly and indirectly, the existing state of air quality will be improved by the BCAP project's implementation, which includes regulatory and policy reform, the development of DoE's institutional infrastructure, vehicle emission control, and a bus modernization program.

Waste Management

The project activities are not expected to lead to the generation and release of any additional wastes to be generated from the operation of VICs, bus depots, CEMPS and other facilities. Rather, it provides the mechanisms to reduce the generation and release of wastes due to the project during operational.

Noise Pollution

The primary sources of noise pollution at bus depots include the operation of buses themselves (engine noise, honking, tire noise), as well as the movement of vehicles and people within the depots area. The primary sources of noise pollution at VICs also include movement of vehicles and people within the VICs area.

Traffic congestion

During operation phase, the movement of increased vehicles and people within the depots area may create traffic congestion. At VICs movement of vehicles and people within the VICs area may also create traffic congestion.

Gender and GBV/SEA/SH

During construction work, there could be exposure of female workers to abuse and harassment by male peers, along with female e-bus users during their journey time. There are also risks in managing construction sites and operating AQM infrastructure, VICs, and bus services.

Employment Generation and Economic Benefit

The project aims to promote and invest in the sustainability of the environment to improve ambient air quality of Bangladesh. Direct beneficiaries of the BCAP project include the operators of the new VICs, the operator of the bus depots facility that will receive project support. Other direct beneficiaries will be the people employed by the vehicle inspection centers and the bus depots. These people will gain year-round employment and social security. Female employment will also positively affect Female Labor Force Participation (FLFP) of the communities.

Table 5: Summary of Potential Environmental and Social Impacts and their Significance

Potential Impacts	Type	Duration	Spatial	Reversible	Likelihood	Intensity	Sensitivity	Significance without mitigation	Significance with Mitigation
Pre-construction phase									
Loss of natural vegetation and trees	Direct	Long term	Local	Yes	Likely	Minor	Moderate	Moderate (-)	Low (-)
Impact on vulnerable and disadvantage groups/communities'/ individuals	Direct	Long term	Local	Yes	Likely	Moderate	Moderate	Substantial (+)	Low (-)
Construction Phase									
Air Pollution	Direct	Short term	Local	Yes	Certain	Minor	Minor	Moderate (-)	Low (-)
Water Pollution	Direct	Short term	Local	Yes	Certain	Minor	Minor	Moderate (-)	Low (-)
Noise Pollution	Direct	Short term	Local	Yes	Certain	Moderate	Minor	Moderate (-)	Low (-)
Impact of land filling	Direct	Short term	Local	Yes	Certain	Moderate	Minor	Moderate (-)	Low (-)
Soil Contamination	Direct	Short term	Local	Yes	Certain	Moderate	Minor	Moderate (-)	Low (-)
Generation of Solid waste	Direct	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate (-)	Low (-)
Site Clearance and Restoration	Direct	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate (-)	Low (-)
Labour and Working Conditions	Direct	Short term	Local	Yes	Certain	Moderate	Moderate	Substantial (-)	Low (-)
Occupational Health and Safety	Direct	Short term	Local	Yes	Certain	Moderate	Moderate	Substantial (-)	Low (-)
GBV/SEA/SH	Direct	Short term	Local	Yes	Likely	Moderate	Moderate	Substantial (-)	
Impacts on Small, Ethnic, and Vulnerable Communities	Direct	Short term	Local	Yes	Less likely	Minor	Minor	Moderate (-)	Low (-)
Operation Phase									
Reduce GHG and Climate risk	Direct	Long term	Local	Yes	Likely	Moderate	Moderate	High (+)	Moderate (-)
Air Pollution	Direct	Long term	Local	Yes	Likely	Moderate	Moderate	High (+)	Moderate (-)
Waste Management	Direct	Long term	Local	Yes	Certain	Moderate	Minor	High (+)	Moderate (-)
Noise Pollution	Direct	Long term	Local	Yes	Likely	Moderate	Minor	High (+)	Low (-)
Traffic congestion	Direct	Long term	Local	Yes	Likely	Moderate	Minor	High (+)	Low (-)
Employment Generation & Economic Benefit	Direct	Long term	Local	Yes	Certain	Moderate	Minor	Substantial (+)	Low (-)

Table 6: Potential Environmental and Social Impacts and Mitigating Measures

Issues/Activities	Potential ES Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
Preconstruction				
Loss of natural vegetation, trees, drainage congestion and land use change	Site Clearance (clearing of the site so that it becomes accessible for further works); Vegetation loss (mainly grass/shrubs but also possibly some trees) lead to potential increase in soil erosion; air pollution due to vehicular movement, and dust emissions from debris stockpiles and drainage congestion & land use change.	<ul style="list-style-type: none"> Restrict site clearance to the required extent as part of the design; Preserve trees, if present, as far as practicable; Water sprinkling compaction of soil covering of debris and waste stockpiles. Debris should be cleared promptly Regularly inspect and maintain drainage infrastructure to ensure it is functioning properly. 	Contractors	PIUs
Impacts on Vulnerable and disadvantage group/ communities/ individuals/ Displacement of encroacher/ PAPs	Limited job opportunities for disadvantaged people who suffer high cost of pollution.	<ul style="list-style-type: none"> Equal opportunities for vulnerable groups participation in capacity building, citizen engagements and job recruitments. 	PIUs	PCMU
Construction				
Air Pollution	<p>Construction equipment:</p> <ul style="list-style-type: none"> Air quality can be adversely affected by emissions from construction machinery and combustion of fuels; <p>Construction activities:</p> <ul style="list-style-type: none"> Dust generation from earth excavation, earth & sand stockpiles during dry period. 	<ul style="list-style-type: none"> Maintenance of vehicles and construction equipment in good working condition, including regular servicing; Water spray to the dry earth/material stockpiles, access roads and bare soils as and when required to minimize the potential for environmental nuisance due to dust; Stored materials such as excavated earth, dredged soil, gravel and sand shall be covered and confined; Establish adequate locations for storage, mixing and loading of construction materials in a way that dust dispersion is prevented because of such operations. Impose speed limits at 30 km/hour on vehicle 	Contractors	PIUs

Issues/Activities	Potential ES Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
		movement at the worksite;		
Water Pollution	Both surface and groundwater may be polluted through runoff spills, and debris, as well as through improper waste management and dewatering activities.	<ul style="list-style-type: none"> • Proper construction management including waste management as well as training of the operators and other workers should be provided to avoid pollution of the water bodies; • Warning signs and awareness raising signs should be enacted all around the site to prevent littering; • Handling and storage of the potential contaminants has to be organized under strict condition to avoid water pollution during construction phase. 	Contractors	PIUs
Noise Pollution	<p>Construction equipment:</p> <ul style="list-style-type: none"> • Noise and vibration will have an impact on adjacent surrounding residents. <p>Construction activity:</p> <ul style="list-style-type: none"> • Noise will have an impact on adjacent residents. 	<ul style="list-style-type: none"> • Create a noise barrier and consider the minimum noise levels at sensitive receptor sites (e.g. dense residential areas, schools, mosques, health centers etc.); • Stone breaking machine should be confined within a temporary shed, so that noise pollution is reduced; • Protection devices (earplugs or earmuffs) shall be provided to the workers operating in the vicinity of high noise generating machines during construction; • Construction equipment and vehicles shall be fitted with silencers and maintained properly if applicable. • Notify the adjacent community before starting the activities 	Contractors	PIUs
Solid Waste	<p>Improper storage and handling of construction & general waste onsite, and potential spills from these may harm the environment and health of construction workers.</p> <p>Improper storage and handling of construction & general solid wastes.</p>	<ul style="list-style-type: none"> • Any wastes should be dump into the designated waste dumping area; • Accidental spillage of hazardous waste should be managed by spreading wood powder on the surface of the oil; • Provide appropriate PPE to the construction personnel for handling construction materials; • Make sure all containers, drums and tanks that are used for storage are in good condition. 	Contractors	PIUs

Issues/Activities	Potential ES Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
Labor employment	Communicable diseases may spread; GBV/SEA/SH issues; Labor influx Unscrupulous and discriminatory labor practices.	<ul style="list-style-type: none"> Recruit as much as local labor possible; Working conditions and terms of employment will be fully compliant with the Bangladesh labor laws and ESF; Train the workers by providing health and safety training on communicable diseases; No child and/or forced labor will be employed by the contractor; Signing of Code of Conduct and training on GBV/SEA/SH. 	Contractors	PIUs
Occupational Health and Safety	Lack of proper infrastructure facilities, such as housing, water supply and sanitation facilities, will increase pressure on the local services and generate substandard living standards and health hazards.	<ul style="list-style-type: none"> Safe and reliable water supply; Hygienic sanitary facilities with separate sanitation for women and sewerage system. Adequate housing including kitchen/dining facility for all workers and avoid overcrowding. Adequate lighting and ventilation and ensure segregated waste bins and fire precaution at labor camp. 	Contractors	PIUs
	There will be a potential for diseases to be transmitted, including malaria, exacerbated by inadequate health and safety practices.	<ul style="list-style-type: none"> Provide adequate health care and sanitation facilities within the construction sites; Train all construction workers in basic sanitation and health care issues and safety matters and on the specific hazards of their work; 		
	There will be an increased risk of work crews spreading sexually transmitted infections and HIV/ AID and other communicable and non-communicable diseases.	<ul style="list-style-type: none"> Provide HIV awareness programming, including sexually transmitted infections (STI) and HIV information, education and communication for all workers on a regular basis; Regular mosquito repellent spraying during monsoon periods. 		
	Construction work may pose health and safety risks to the construction workers and site visitors, leading to severe injuries and deaths.	<ul style="list-style-type: none"> Provide the workers with a safe and healthy work environment; Provide appropriately equipped first-aid stations Provide appropriate PPE for workers, such as safety 		

Issues/Activities	Potential ES Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	Lack of first aid facilities and health care facilities in the immediate vicinity will aggravate the health conditions of the victim.	<p>boots, helmets, masks, gloves, protective clothing, goggles, full-face eye shields and ear protection;</p> <ul style="list-style-type: none"> • Maintain the PPE properly by cleaning dirty ones and replacing them with damaged ones; • Appoint an environment, health and safety manager/supervisor to look after the health and safety of the workers; • Inform the local authorities responsible for health, religion and security before the commencement of civil works and establishment of construction camps so as to maintain effective surveillance over public health, social and security matters. • Regular health check-ups and records of the workers 		
	Labor influx	<ul style="list-style-type: none"> • Implement a labor management plan to regulate workforce behavior. • Promote local hiring to reduce excessive labor influx. Engage with local communities to address concerns and ensure social harmony. 	Contractors	PIUs
Community Health and Safety	<p>Accidents on the approach road and construction site;</p> <p>Noise and dust pollution;</p> <p>Communicable diseases can spread among the local community.</p> <p>GBV/SEA/SH issues</p>	<ul style="list-style-type: none"> • Prior to starting the construction activities contractor will be informed the local community; • Instruct the drivers and limit the speed of the vehicles; • Regular health check-ups of the workers and awareness training about the communicable diseases; • Proper lighting at the project site during the night time; • Avoid unnecessary noise pollution; • Spraying water on the dry surface to reduce the dust pollution • Provide proper access control to the project site and unauthorized entry to the project site will be controlled by deploying security personnel. • Raise community awareness about GBV/SEA/SH, GRM to address GBV/SEA/SH, map SWEA/SH service provide 	Contractors	PIUs

Issues/Activities	Potential ES Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
		<ul style="list-style-type: none"> and sensitize the PIUs • Ensure emergency preparedness and response measures are in place 		
Squatters on Public Land	Need for resettlement;	<ul style="list-style-type: none"> • Provide job opportunity and relocation assistance 	ES specialist of DoE/BRTA/DTCA/PIUs	ES specialist of DoE/BRTA/DTCA/PIUs
Archaeological/ Historical/ Social/ Cultural/ Religious Sites	Negative impact on cultural heritage may destroy its value and the loss will be irreparable	<ul style="list-style-type: none"> • Avoid Archaeological/Historical/Social/Cultural/Religious sites during the site selection • Provide Chance Finds Procedure in bidding document. 	Contractors	PIUs
Post-construction clean-up	Risk of soil, water, waste impacts from residuals left after project completion	<ul style="list-style-type: none"> • Remove all spoils wreckage, rubbish, or temporary structures (such as buildings, shelters, and latrines) which are no longer required; • The construction camp is to be checked for spills of substances such as used container/water bottles, paint, etc. and these shall be cleaned up. 	Contractors	PIUs
Operation phase				
Reduce GHG Emission and Climate risks	The project will support operations and management of all project-financed infrastructure to improve their technical capacity so that they can properly manage climate risks and respond to operational disruptions related to climate and geophysical hazards.	<ul style="list-style-type: none"> • The amendment of the ECA and associated rules and standards will help the GoB promote upstream interventions that can effectively reduce pollution including GHG from sources; • VICs will contribute to the Government's efforts to reduce GHG emissions from the transport sector; • Bus modernization program through e-bus also contribute reduction of GHZ emissions. 	DoE, BRTA, and DTCA	Relevant Ministries
Air Pollution	Due to the implementation of the project activities of the BCAP project such as regulatory and policy reform, institutional infrastructure development of DoE, e-bus services & vehicle emission control will improve the current air quality status directly and indirectly. Implementation of these activity have the potential to bring	<ul style="list-style-type: none"> • O&M of CEMPs; VIC & bus depots are required 	DoE, BRTA, DTCA	Relevant Ministries

Issues/Activities	Potential ES Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	positive impact to the existing air quality of the proposed project area and their surrounding areas.			
Generation of waste due to operation of the facilities and replacement of the old bus and battery	Operation of AQM facilities and VICs & depots may generate hazardous waste, improper handling of these waste has the potentiality to adversely impact the surrounding environmental features (air, soil, water, and eco-system) of the proposed project areas. Scrap/waste management issue due to replacement of the old buses and replacement of battery.	<ul style="list-style-type: none"> Need special handling, transport, and final disposal of the scrap processed from old buses and battery. A SOP for AQM, VICs and other facilities should be in place. A sample SOP of the facilities is provided in Annex V. 	DoE	MoEFCC
Community Health & Safety	Improper health and safety policy maintained at the project area during the operational phase may lead to the outbreak of different diseases to the surrounding communities through the sick staff and personnel working in the project area as well as from visitors visiting the center.	<ul style="list-style-type: none"> But if the proposed project components are implemented properly then the improved environmental conditions will show positive impact. For example, reform of existing environmental legislation, improved air quality as a result of VICs will ensure community health and safety through improving the existing environmental condition by decreasing in road accidents, hence lower mortality rates associated with transportation. 	DoE/BRTA/DTCA	Relevant Ministries
Employment Generation and Economic Development	A significant number of people will be benefited directly from the project. These people will gain year-round employment and social security.	<ul style="list-style-type: none"> Equal opportunities for women, disadvantaged and vulnerable group participation in capacity building, citizen engagements and job recruitments 	DoE/BRTA/DTCA	Relevant Ministries
Note: Specific Mitigation/enhancement measures and cost will be determined during the site specific Environmental and Social Impact Assessment of individual sub-projects.				

4.2 Environmental and Social Monitoring

A tentative effects monitoring plan proposed for the BCAP is presented in **Table 7**. It can be used as guideline to prepare the sub-project specific monitoring plan. However, this tentative monitoring plan is not indicating the limitation of work rather it can be modified based on project circumstances and depends on the sub-project specific activities. If any changes are needed, it would be done with the consent of ES specialist/PIU of DoE/BRTA/DTCA and the WB.

Table 7: Effects Monitoring Plan

Parameter	Purpose	Means of Monitoring	Location	Frequency	Implemented By	Supervised By
Implementation Stage						
Soil Quality	Restoration of changes due to construction activities	Soil quality test report Parameters for testing are Organic Matter, Zn, Sulphur, Lead and Nitrate	In the work site	Once during pre-construction Twice during construction period	Contractor of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/DTCA of PIUs
Air quality	Evaluation of effect of the mitigation measure towards air pollution	Visual inspection & consultation with local people Air quality test report Parameters are PM10, PM2.5, SOx, NOx, and CO	In the work site	Once during pre-construction Visual monitoring on a daily basis. The parameters would be tested twice in each year during construction period	Contractor of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/DTCA of PIUs
Water quality	Evaluation of effect of the mitigation measure towards water pollution	Ground water/Surface water test (pH, Color-true or apparent, turbidity, total hardness, Cl, TDS, Mn, As, Fe, TC, FC)	In the work site	Once during pre-construction The parameters would be tested twice in each year during construction period	Contractor of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/DTCA of PIUs
Noise & Vibration	Evaluation of effect of the mitigation measure towards noise pollution	Visual inspection & consultation with local people Noise level test report LAeq (Day & Night) Vibration level test	In the work site	Once during pre-construction Twice during construction period	Contractor of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/DTCA of PIUs
Waste Pollution	Evaluation of effect of the mitigation measure for waste	Record of kinds and quantity of waste, and the disposal method	In the work site Workers camp	Continuous, during construction period	Contractor of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/DTCA of PIUs
Aesthetics	Evaluation of effect of the mitigation measure	Visual inspection & consultation with local people	In the work site	Continuous, during construction period	Contractor of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/DTCA of PIUs

Parameter	Purpose	Means of Monitoring	Location	Frequency	Implemented By	Supervised By
Traffic Congestion	Evaluation of effect of construction schedule	Visual inspection & consultation with local people Record of consultation Record of accidents Record of numbers of construction vehicles	In the work site	Continuous, during construction period	Contractor of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/DTCA of PIUs
Inclusion of disadvantaged and vulnerable	To determine the level of inclusion of the disadvantaged group in the project activities	Consultation with local people Record of consultations	In the project area	Continuous, during implementation	PIUs of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/ DTCA
Community health and safety including GBV/SEA/SH	Evaluation of effect of the work safety plan	Field inspection & consultation with local people Record of community consultations Record of accidents and grievances	In the project area	Continuous, during Implementation	PIUs of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/ DTCA
Worker's health and safety	Evaluation of effect of the work safety plan	Visual inspection & consultation with worker Record of accidents Record of training and tool-box meetings	In the work site	Continuous, during construction period	PIUs DoE/BRTA/DTCA	ES Specialist of DoE/BRTA/ DTCA
Records of grievances	Keep record to track whether the grievances are noted, filed, recorded, and resolved	Register	In the work site	Continuous	PIUs DoE/BRTA/DTCA	ES Specialist of DoE/BRTA/ DTCA

Parameter	Purpose	Means of Monitoring	Location	Frequency	Implemented By	Supervised By
Post-construction clean-up	Evaluation the implementation of ESMP	Visual inspection & consultation with local people Reporting	In the work site	At the end of construction period along with the ESMP implementation report	Contractor of DoE/BRTA/ DTCA	ES Specialist of DoE/BRTA/ DTCA
Submission of ESMP implementation report	Evaluation the implementation of ESMP	Record of report submission	MDSC/PMU	At the end of construction period	Contractor	ES Specialist /PIU
Operation Phase						
Air Quality	Visual inspection, and consultation with local	O&M budget for periodic monitoring	In the project area	During operation period	PIUs of DoE/BRTA/ DTCA	DoE/BRTA/ DTCA
Noise Level	Visual inspection, and consultation with local	O&M budget for periodic monitoring	In the project area	During operation period	PIUs of DoE/BRTA/ DTCA	DoE/BRTA/ DTCA
Health & Safety	Visual inspection, and consultation with local	O&M budget for periodic monitoring	In the project area	During operation period	PIUs of DoE/BRTA/ DTCA	DoE/BRTA/ DTCA
Note: Specific monitoring program will be formulated during the site specific Environmental and Social Impact Assessment of individual sub-projects.						

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

5.1 General Principle

Due to the nature of some of the proposed activities under BCAP project and their potential ES impacts, the project can be categorized as ‘Orange and or Red’ category according to ECR, 2023 and also rated as ‘Substantial’ as per the WB ES risk classification, which requires initial ES screening, in some cases detail ESIA and execution of ESMP. Therefore, the ESMF is prepared based on the following principles that can lead the planning and implementation of the project activities.

- The National Project Coordinator, PCMU-BCAP/MoEFCC at the national level and Project Directors (PD) of PIUs of the IAs at the project level are responsible for the compliance with national policies, regulations, and WB ESSs and Guidelines, as mentioned in this ESMF report. The ESMF will serve as the basis for ensuring ES compliance.
- PD of PIU/DoE in coordination of the PIUs of BRTA and DTCA is responsible for obtaining environmental clearance from DoE, local government agencies and WB as required.
- ESIA and ESMP need to be prepared for activities upon screening. In case, requirements of DoE’s ESIA guideline differs from those of WB ESF, the more stringent standards and requirements will apply.
- If any sub-projects with impacts identified in ESIA which may categorize the project to High risk (according to ESF) will not be eligible for WB’s financing.
- Activities requiring Free, Prior, Informed Consent (FPIC) from small, ethnic, and vulnerable communities will not be eligible for funding from the project.
- Activities with significant environmental impacts, including those that significantly increase greenhouse gas emissions and impact of natural habitats and biodiversity will not be eligible for WB’s financing.
- Planning and design of the any additional activities should ensure minimal assessment of cumulative impacts.
- Environmentally sensitive areas, cultural heritage sites, restricted or disputed lands (if identified during project implementation) should be handled with appropriate mitigation or compensation measures during implementation following the chance find procedure.
- Participation of stakeholders (especially local communities) should be ensured by PIUs in planning, implementation, and monitoring of sub-project activities.
- PIUs will ensure appropriate institutional set up for implementing ESMP and inter-agency coordination. PIUs will also ensure that bidding/agreement/contract documents for construction contractors, PPP operators and PFIs/PSI have specific clauses to ensure implementation of ESMPs, as required.
- Contractors to be engaged in construction/renovation/expansion/repair and maintenance/operation workers under the project should be conversant with OHS standards, labor laws, GBV/SEA/SH issues, incidence response and reporting mechanism.
- PIUs will inform project stakeholders about project interventions and its potential impacts on the surrounding ES elements.
- When the EF will be created, PIU/DoE with direct guidance of the PCMU/BCAP-MoEFCC will update the ESMF to cover the activities supported under the EF.
- In case of triggering the CERC, PIU/DoE in coordination of PIUs of other IAs will update the ESMF to cover the activities supported under the CERC. A list of Positive and Negative activities for CERC

component is given in **Annex IV**.

5.2 Environmental and Social Assessment and Management Process

- PIU/DoE in coordination of the ES experts of the 3 PIUs will provide technical backstopping and coordination support to the PCMU to perform the ES screening of the BCAP project. The relevant ES experts of PIUs will start the task during the initial stage of the project implementation.
- If ES Screening would identify any activities that requires further ES Assessment, PIU/DoE in coordination of other PIUs will engage an independent ESIA consulting firm to generate a detail ES baseline of the project, conduct initial scoping (or IEE) and prepare a ToR for ESIA study.
- PIU/DoE in coordination of other PIUs will share the scoping/IEE report along with the draft ESIA ToR to respective clearance office of DoE.
- PCMU with support of the 3 PIUs will review, and clear screening and environmental assessment reports made by Environmental consultant before submitting for DoE clearance and provide necessary technical inputs.
- PCMU through 3 PIUs will conduct verification of some screening and assessment through field visit.
- PIUs through relevant ES staff will ensure that environmental considerations are given enough attention, weight, and influence over selection of construction sites and improvement of infrastructures all over the country. They should ensure that the budget is adequate for ensuring ESF compliance
- The respective PIU will prepare the bid documents. PIU ES consultants will ensure that necessary ES clauses are included in the bidding documents. Contractors/PPP operators/PFIs should implement the ESMP. PIU consultants and other technical and M&E experts will supervise ESMP implementation and ES compliance.
- All the activities of BCAP project will follow existing Environmental Code of Practices (ECopS) prepared under ESMF.
- An RPF will be prepared to guide the land acquisition and resettlement process through the RAP.
- A SEA/SH Action Plan, including a grievance management system and a Code of Conduct for workers, will be prepared. Awareness and communication campaigns will also address SEA/SH risks for managing construction sites and operating AQM infrastructure, VICs, and bus services.
- The project will ensure that the ESIA addresses all potential ES direct and indirect impacts of the project throughout its life: pre-project, during the project, and during the operation stages. The ESIA will suggest appropriate mitigation measures. If any additional impacts are identified, the ESIA and ESMP should be reviewed and updated.

The flow chart in **Figure 2** outlines the necessary ES assessment procedures.

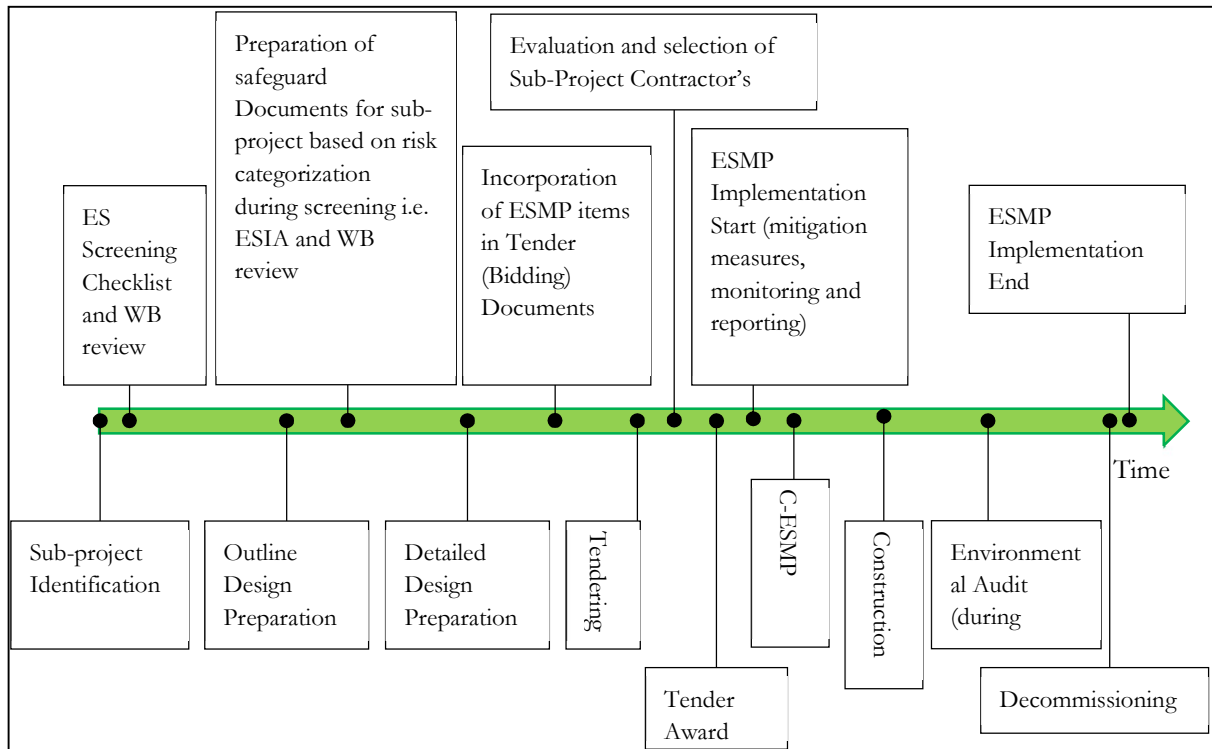


Figure 2: Overall ES Management Procedure

5.2.1 Screening

The screening matrix will help to determine the eligibility of subprojects and activities and to decide the suitability of project activities in that particular site, and the level of Impact Assessment required. During screening, if it is found that the project may create significant, adverse and irreversible damage to the area or may violate an existing rules or regulations, including those generating hazardous waste will be included in the negative list of activities the project will not finance (See list of Negative List of Subprojects above). For instance, any activities that may encroach into an ecologically critical area or a national/ global heritage site will be rejected by the respective PIU. PCMU/BCAP through its PIUs must confirm that the findings of the screening carried out by the ES experts. Moreover, alternative project activities/methods and/or operation will be considered, and the impacts will be assessed to make the project more environment friendly and socially acceptable. Sample ES screening forms have been attached at **Annex I and II**, which will be further developed during the implementation stage.

5.2.2 Baseline Data Collection

ES baseline information of the project sites will be collected through field visits, surveys and intensive consultation with local people. Environmental baseline in the sub-project areas of influence will be established both from primary and secondary sources, including assessment of natural and critical habitats. The data collection will include all relevant bio-physical aspects of the environment including air, water, noise, soil, land, hydrogeology/geo-morphology, covering all environmental vulnerabilities, assessment of different habitats, biodiversity and ecosystem. This will also include the establishment of environmental quality (air, water, noise, and vibration) monitoring with an adequate number of samples, as established on a sampling network to provide a representative picture of pollution levels. Additional data on sensitive environmental receptors, if any, shall be collected to analyze and predict possible risks and impacts to acceptable standards. Socio-economic and cultural baseline will also be collected relevant to the risk and impact assessment and preparation of management plans. Identification of disadvantaged and vulnerable groups will be conducted.

5.2.3 Environmental and Social Impact Assessment

Initial Environmental Examination (IEE)

If any ES Screening exercise of a particular project activities recommend further ES Assessment, then the IEE study will be conducted under the PIU/DoE in coordination of the respective PIU. However, according to the project planning, the activities those need IEE will be implemented at initial period and must be carried out prior to the actual interventions start. The purpose of the IEE is three folds:

- to obtain Clearance from DoE and obtaining decision from DoE whether the particular project activities need further assessment such as detail ESIA or not;
- provide/finalize the ToR for the ESIA study, if required; and
- continue consultations with project stakeholders.

Environmental and Social Impact Assessment (ESIA)

The purpose of ESIA is to give the environment and people its due importance in the decision-making process by clearly evaluating the ES consequences of the proposed study before action is taken. Early identification and characterization of critical ES impacts allows the public and the government to form a view about the environmental viability and social acceptability of a proposed development project and what conditions should apply to mitigate or minimize those risks and impacts.

In the initial phase of the BCAP project, the ESIA shall achieve the following objectives:

- To establish the ES baseline in the study area, and to identify any significant ES issues;
- To assess these impacts and provide for measures to address the adverse impacts by the provision of the requisite avoidance, mitigation and compensation measures;
- To integrate the environmental and social issues in the project planning and design;
- To develop appropriate management plans for implementing, monitoring and reporting of the environmental and social mitigation and enhancement measures suggested.

The impact assessment will be conducted using major stages as shown in the following diagram **Figure 3**:



Figure 3: Impact Assessment Process

Impact Assessment

The impacts of the project activities on the ES components will be identified through evidential judgement, consultation with experts and local communities. The impacts will be analyzed and graded qualitatively (e.g. high, medium, low) in order to identify the major impacts. The future-without-project (FWOP) condition will be generated through trend analysis using information collected. The future-with-project (FWIP) condition will be predicted using professional judgment of the multi-disciplinary team members based on information collected. Difference between the two (FWIP-FWOP) conditions will be taken as impact of the proposed

interventions. The impact will also be monitored. Moreover, cumulative impacts of the project inside or outside the project area will be analyzed. Possible mitigation measures for alternatives of the project will be identified in this stage.

5.2.4 Environment and Social Management Plan (ESMP)

This section presents the outline ESMP of the BCAP project. A more detailed version of ESMP must be included in ESIA.

Scope and Objectives of ESMP

The basic objective of the ESMP is to manage risks and impacts of project interventions in a way that minimizes the possible adverse impact on the environment and people of the project influence area. The specific objectives of the ESMP are to:

- Identify the mitigation measures against each identified negative impacts; and facilitate implementation of those during implementation by PIUs;
- Maximize and sustain potential sub-projects benefits and control negative impacts;
- Draw responsibilities for project proponents, contractors, operators, consultants, and other members of the project team for the ES management of the project;
- Define a monitoring mechanism and identify monitoring parameters in order to:
 - Ensure the complete implementation of all mitigation measures,
 - Ensure the effectiveness of the mitigation measures,
 - Maintain essential ecological process, preserving biodiversity and where possible restoring degraded natural resources and habitats; and
 - Assess environmental training requirements for different stakeholders at various levels.

The ESMP will be managed through a number of tasks and activities and site-specific management plans. One purpose of the ESMP is to record the procedure and methodology for management of mitigation identified for each negative impacts of the project. The management will clearly delineate the responsibility of various participants and stakeholders involved in planning, implementation and operation of the project.

5.2.5 Inclusion of Relevant Components of ESMP in Contract Documents

The ESIA should include a section on special environmental clauses (SECs) to be incorporated in the Tender Document under General/Particular Specification. These clauses are aimed at ensuring that the Contractor carries out his responsibility of implementing the ESMP, monitoring plan as well as other environmental and safety measures. Such clauses may specify, for example, penalties for non-compliance as well as incentives to promote strong compliance. The various contractors/operators must be made accountable to implement the plans and mitigation measures which pertain to them through contract documents and/or other agreements of the obligations and importance of the ES components of the program. In addition, ESIA will ask to submit a C-EMP to encompass all of the detailed plans, measures and management systems they are required to develop and implement, to be based on the ESMF recommendation and ESIA findings, their work methodology, work force involvement, equipment's standard, and work scheduling.

5.2.6 Payment Milestones

Payments to contractors/operators would be linked to environmental performance, measured by completion of the prescribed ES mitigation measures. Contractors/operators would be required to join forces with the executing agency, project management unit, supervising consultants and local population for the mitigation of adverse impacts of the project. For effective implementation of the proposed mitigation and monitoring measures they would attract trained and experienced environmental management staff.

5.2.7 Guideline to Incorporate Environmental and Social Management in Bid Documents and Project's Operational Manuals

PIUs will be responsible to incorporate environmental management requirements in the bidding documents and the different operational manuals of the project activities, with the assistance of the ES consultants or other responsible staff. The generic guidelines to incorporate ES aspects for this purpose are listed below. These are examples only and shall be further elaborated and expanded upon based on the findings and recommendations of the ESIA.

- Prepare cost estimates, to be incorporated in Bid Documents.
- Contractor version of the ESMP along with the ECoPs to be incorporated in the bid document's work requirements.
- Penalty clauses for not complying with ESMP requirements to be incorporated (as per addendum to Clause 17.2 Contractor's Care of the Works).

5.2.8 Environmental Codes of Practice (ECoPs)

The ECoPs are generic, non-site-specific guidelines. The ECoPs consist of environmental management guidelines and practices to be followed by the contractors/ implementation organizations for sustainable management of all ES issues. The contractors will be required to follow them and also use them to prepare site-specific management plans. Details of the ECoPs listed below are in **Annex III**.

- ECoP-1: Waste Management
- ECoP 2: Water Resources Management
- ECoP-3: Noise and Vibration
- ECoP-4: Air Quality Management
- ECoP 5: Occupational Health and Safety
- ECoP 6: Road Transport and Road Traffic Management
- ECoP 7: Construction Camp Management
- ECoP 8: Water and Sanitation Facilities for Labors

5.2.9 Consultation and Participation Plan

A separate SEP has been prepared which discussed this ESS10 requirements elaborately.

5.2.10 Labor Management Procedures

The proposed project will entail the employment of many laborers, especially during construction. Most labor will be locally hired, except for skilled workers who may not be found in the program areas. However, there are potential risks associated with hiring skilled and non-skilled workers, especially during construction, including health hazards, poor living conditions, accidental hazards, etc. Similarly, hiring labor from external areas may cause social risks to the local communities, including gender-based violence, spreading of communicable diseases, price hiking of daily used products/foods, etc. This section assesses the potential risks and impacts of labor assignment for implementing the Project activities by the Implementing Agencies (IAs)— and addresses them through mitigation measures in line with ESSs and Bangladesh Labor policies and provisions and WB ESF ESS2.

This project will likely have no significant labor influx, given that most project sites are in urban or peri-urban areas. The potential labor influx is also not expected to be significant, with the unskilled and most of the semi-skilled labor to be sourced locally. Only the skilled and some semi-skilled labor will be recruited from outside. However, risks from labor influx in multiple project areas along the regional corridors exist. This section is prepared for the project meeting the Bangladesh Labor Act 2006 (including subsequent amendments), Bangladesh Labour Rules 2015, as well as the World Bank's Environmental and Social Framework (ESF), Environmental and Social Standard 2: Labor and Working Conditions (ESS2). The LMP has also considered applying nationally adopted health protocols to address any pandemic outbreak related to project workers in Bangladesh.

This LMP has been developed to achieve the following specific objectives:

- To highlight and promote workplace safety and health.
- To promote fair treatment, non-discrimination, and equal opportunity for project workers irrespective of sex, race, or ethnic identity.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, per the ESS2 of the World Bank ESF), and contracted workers and primary supply workers, as applicable.
- To prevent the use of all forms of forced labor and child labor.
- To support the principles of freedom of association and collective bargaining of project workers consistent with national law.
- To provide project workers with accessible means to raise workplace grievances.

The implementing agencies (IAs), through their respective Project Implementing Units (PIU), will contract agencies/firms to undertake civil works and supply equipment and tools under Components 1 and 2, and the PIU will engage individuals and consulting organizations to support core functions under the Project. Government officials will also be deputed for the Project in the PIUs, and as well as relevant experts and other staff will be recruited from the market to manage the implementation of their respective works, supply, and training contracts.

Project Workers

The LMP applies to all project workers, including full-time, part-time, temporary, seasonal, migrant workers, contractors, sub-contractors, and primary suppliers. The PIUs will comprise government officials and professionals/consultants in their respective fields. The PIUs will employ contracted as well as direct workers. The Contractors' workers will include unskilled, semi-skilled, and skilled workers. As far as the characteristics of the labor force in road infrastructure with enhanced road safety features, it is expected that both male and female workers will be engaged in the designated activities.

Primary supply workers will be relevant where contractors continuously get construction inputs from contracted suppliers. It is also expected that women will be employed in technical (engineering, planning, and management) and manual jobs in the PIUs and as other service staff for the Contractors. Provisions will be made to avoid the use or employment of child and forced labor at any level of the project. The characteristics of the project workers have been discussed hereunder.

Direct Workers²: People employed or engaged directly by the DoE, BRTA, DTCA, or the Project Implementing Units (PIUs) on their respective behalf to work specifically concerning the Project. Direct workers will include the project manager/s, respective supervisors, and employees of respective IAs deployed for the project. The estimated number of direct workers will be decided per the respective IA's existing institutional arrangements and practices.

Contracted Workers³: All workforce deployed by the Contractors and the Project Management Consultant (for all packages) will be considered contracted employees. The Contractor(s) may also hire multiple sub-contractors, and all employees of such sub-contractors will be deemed to be contracted workers. Individual consultants with the PIU, people employed or engaged by consultant firms, and contractors to perform work related to core functions.

Primary Supply Workers⁴: Primary supply workers will provide aggregates and raw materials for the construction site. People employed or engaged by primary suppliers of the contractors who would continuously supply goods for the core function of the project. The project will review the involvement of primary supply workers based on contractors' methods of procuring construction inputs.

When primary supply workers are engaged, it must be ensured that no child and/or forced labor is involved and that OHS requirements for the laborers are followed. Further, if security personnel is engaged in safeguarding project sites and material, the IAs will:

- a) Make reasonable inquiries to verify that the security personnel employed to provide security are not implicated in past abuses.
- b) Train them adequately (or determine that they are appropriately trained) in the use of force (and, where applicable, firearms) and appropriate conduct toward workers and affected communities; and
- c) They are required to act within the applicable law and any requirements set out in the ESCP. A Code of Conduct in the comprehensible local language, explained and understood, including ramifications for non-compliance, must be signed.

Government civil servants who will support the Project will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement unless there has been an effective legal

² A "direct worker" is a worker with whom the Program/ Project has a directly contracted employment relationship and specific control over the work, working conditions, and treatment of the project worker. Where government civil servants are working in connection with the project, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project.

³ A "contracted worker" is a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker.

⁴ A "primary supply worker" is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person.

transfer of their employment or engagement to the project. ESS2 will not apply to such government civil servants. Nevertheless, their health and safety needs will be considered, and the measures adopted by the project for addressing OHS issues, including those related to COVID-19 infections, will apply to them.

All the components have been provisioned for the project's civil works, supply, installation of equipment and machinery, and supply of vehicles. The PIUs will implement activities under both components within the IAs. The four implementing agencies will assign their permanent staff to the PIUs, headed by a PD. The PIU will have individual specialists to implement the core activities under the project.

The direct workers will be recruited when the project is approved, especially those forming part of PIUs. The employment of field-level staff and consultants will be done after Project effectiveness. Considering the nature of the project workforce (unskilled, semiskilled, and skilled construction labor and specialist consultants) and Bangladesh's labor force market characteristics, the number of female workers is not expected to be high. Women are estimated to represent about 5-10 percent of the workforce, and those would likely be technical/managerial and/or staff working in the operation offices and camps (maids, cooks, cleaners, etc.).

The PIUs will gather and retain information on the engagement of contracted workers. The contractors and any consulting firms engaged for the PIUs will be contractually obligated to maintain updated information on all categories of contracted workers, including those employed by the subcontractors, especially the non-local workers, and periodically share the same with the PIUs. The PIU will then make the information available to the parties interested, including the World Bank.

The format for the submittal of workers' information will be finalized at the mobilization of the contractors. The information database on contracted works to be maintained by the contractors will include but not be limited to the following:

- Name and age (supported by NID/ Birth Certificate/ Certificate from the Union Parishad)
- Mother's and Father's name and permanent address
- Marital status and name of the spouse (if married)
- Number of dependents with relations and gender (as applicable)
- Place of stay of spouse and children during work engagement under the Project
- Address and contact number (in case of an emergency) with at least one alternative contact number and person(s) of contact
- Key skills and years of experience
- Work activities, schedule, and duration of engagement as per the contract with the contractors/PIUs
- Duration of contract and rotation arrangements
- Facilities arranged by contractor/firm, including health check-ups before engagement, accommodation (to be specified by contractor)
- Pre-employment check-ups, fitness tests, and health awareness campaigns for workers

Assessment of Labor Risks

The main labor risks associated with the project are assessed to be related to the work-associated risk of accidents, labor influx, and community health and safety, including risks of SEA/SH. Following is some of the potential labor risks associated with this project, with suggestions on how to deal with specific problems if they arise:

Table 10: List of potential labor risks

<p>Labor influx</p>	<p>The project is expected to design and implement civil, and refurbishment works. The potential sites will be distributed within mostly urban and peri-urban, and some rural areas on the highways. There will be no significant labor influx as the project will employ only a limited number of external workers.</p> <p>Generally, specific requirements to manage risks associated with labor influx related to the interaction between project workers and local communities, such as communicable diseases and SEA/SH, are expected to be moderate and managed through contractual requirements, code of conduct, and training.</p> <p>For works amenable to both males and females, persons with disabilities, and other workers from vulnerable groups will be given equal employment opportunities and wages for equal work or standard under the project.</p>
<p>Child Labour</p>	<p>According to the Labor Act 2006, no one below 14 years (minimum age) will be employed as labor. A child over the minimum age (14) and under the age of 18 may be used or engaged in connection with the project only if the work is not likely to be hazardous or interfere with the child’s education, or be harmful to the child’s health or physical, mental, spiritual, moral or social development.</p> <p>IAs will regularly monitor health, working conditions, hours of work, and other requirements of ESS2.</p> <p>There is a risk of engaging child labor in different tasks during construction. The contractor will be prohibited from employing anyone under the age of 14. The above policies will apply to children above 14 and below 18 years of employment.</p>
<p>Forced Labor</p>	<p>Debt bondage and forced labor are strictly prohibited under “The Prevention and Suppression of Human Trafficking Act of 2012”. The law says, “If any person unlawfully forces any other person to work against his/her will or compels to provide labor or services or holds in debt-bondage to exact from the person any work by using force or other means of pressure or by threat to do such, s/he shall be deemed to have committed a punishable offense.”</p> <p>Forced employment of laborers, especially of local laborers or internal migrants a serious offense and must be prohibited. Surprise and random inspections by the Project will be carried out regularly to ensure ESS2 compliance.</p>
<p>Setting up Labor Camp</p>	<p>Setting up labor camps in the project areas can cause land encroachment; solid and liquid waste from the labor camp and potential community health risks, including SEA/SH risks, are some of the major risks associated with this issue.</p> <p>Labor camps should be constructed at a distance from the water bodies, away from productive land, and away from the settlement during the selection of land for the labor camp. Solid and liquid waste should not be discharged into the water bodies, and contractors will instruct workers to maintain a clean/ healthy environment in the camps.</p>

	All workers will be required to adhere to an enforced Code of Conduct (CoC) and raise awareness among the communities about STDs, SEA/SH, and the project GRM.
Sexual Exploitation and Abuse, and Sexual Harassment (SEA/SH)	<p>The project's risk of sexual exploitation and abuse (SEA) and sexual harassment (SH) is assessed as moderate and planned to be managed through contractual requirements, code of conduct, and training.</p> <p>Contractors will ensure that workers receive the necessary SEA/SH orientations and that CoCs are signed before work commences. Adequate measures will be taken to mitigate SEA/SH risks in and around works sites.</p> <p>The labor-related GRM shall also address any SEA/SH-related grievances raised by the workers.</p> <p>The World Bank Guidance Note on <i>Addressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) in IPF</i> will be referred in the Project documents to prepare Contractors ESMPs with labor management practices for governing the conduct of all workers to ensure acceptable behavioral requirements with other workers (including training and signing CoC by all workers) and concerning nearby communities.</p>
Occupational Health and Safety (OHS)	<p>The OHS of those involved in the project is a significant issue. Hazards include increasing pathogen exposure, long working hours, psychological distress, fatigue, occupational burnout, and physical and psychological stress.</p> <p>World Bank Group EHS, WHO's COVID-19 OHS Guidelines, World Bank's COVID-19 Considerations in Construction/Civil Works Projects and Public Consultations and Stakeholder Engagement will be referred to minimize the OHS hazards and risks.</p>

Overview of Labor Laws

Labor and Working Conditions Standards are defined in the Labor Act 2006, Bangladesh Labor Rules 2015, and Occupational Health and Safety Policy 2013. The Bangladesh Labor Act 2006 is comprehensive legislation. The Act addresses three areas: (i) Conditions of service and employment, including wages and payment, establishment of Wages Boards, employment of young people, maternity benefits, working hours and leave; (ii) health, safety, hygiene, and welfare, injury compensation; and (iii) trade unions and industrial relations.

The Public Procurement Rule 2008 requires contractors to take all reasonable steps to safeguard the health and safety of all workers working on-site and other persons authorized to be in it; (i) to keep the site in an orderly state; and (ii) to protect the environment on and off the site; (iii) to avoid damage or nuisance to persons or property of the public or others resulting from pollution, noise or other causes arising as a consequence of the Contractors methods of operation.

Responsible Staff and Procedure

The PIUs of IAs are responsible for overseeing all aspects of the implementation of the LMP, including ensuring contractor compliance. The PIUs will address and provide all LMP aspects as part of procurement for intervention and during staff induction. The PIUs, Consultant Firm(s), and Contractors (including

Subcontractors) will be responsible for the management of workers' (including trainers, staff, etc.) issues in the field.

The Contractor will be required to develop, adopt, and implement a written Labor Management Plan as part of the contract before employing any labor concerning the project work. They must adopt and enforce good labor management practices that are acceptable to the World Bank, as outlined in this LMP. The PIUs will supervise the Contractors and Consultant Firm(s) implementation of the Labor Management Plan.

Contractors and consulting firms will ensure compliance with acceptable safety measures and record incidents with their dedicated OHS staff. Minor incidents are reported to PIUs monthly and reflected in the quarterly reports to the World Bank. Major incidents/issues are flagged to the World Bank immediately with the ESCP.

The PIU will ensure that the Environmental and Health Safety Guidelines (EHSG) and the ILO Convention 167: Safety and Health in Construction Convention, 1988, which adopted specific proposals regarding safety and health in construction, are adopted and followed. Contractors must engage a minimum of one safety representative/officer and prepare and enforce Life and Fire Safety Protocols consistent with GIIP as part of the C-ESMP.

Contractors will comply with labor conditions, including non-discrimination, wages, safer working conditions, etc. The PIU will monitor periodically to ensure that working conditions for labor are met per national legislation. The awarded contractors will keep records under the specifications set out in this LMP. The PIU may require records to ensure that labor conditions are met. The PIU will review records against actuals at a minimum monthly basis and can require immediate remedial actions if warranted. Quarterly reports to the World Bank will include a summary of issues and remedial actions.

Setting up the labor camps in the project areas can be a reason for land encroachment; solid and liquid waste from the labor camp and potential community health risks, including SEA/SH risks, are some of the significant risks associated with this issue. Labor camps should be constructed at a distance from the water bodies, and productive land should be avoided and away from the settlement during the selection of land for the setup of the labor camp. Contractors will oversee this process from close and report if otherwise. No solid and liquid waste should be discharged into the water bodies, and contractors will instruct workers to maintain a clean environment in the camps.

A Grievance Redress Mechanism (GRM) has been detailed in this document, including the Grievance Redress Committees (GRCs) setup. Contractors will be required to abide by the provisions of the GRM. The Environmental Specialist and the Social Specialists of the PIU and the PMC will review records monthly. PIUs will keep abreast of resolutions and reflect in quarterly reports to the World Bank. Given the anticipated number of project personnel/workers, the workers' GRM will be set up separately, apart from the Project level GRM. However, personnel in the GRC on both the GRMs may have overlapping functions. Reporting channels for the GRMs may also be identical.

PIUs, Consulting Firm(s), and Contractors must ensure that the assigned personnel are adequately trained and briefed on overall health and safety arrangements, equipment use, GRM procedure, and working conditions of the project. They are also responsible for training on PPE, hygiene facilities and behavior, SEA-SH, and preparing and obtaining a signed code of conduct (CoC). Workers will also be briefed on CoC in the local language before a certifier is assigned by the contractors and authorized by the PIUs.

The project will organize sessions to raise communities' awareness of issues relevant to the project's compliance and standards (e.g., labor standards, gender-based violence, etc.). This, in addition to the project's Communication Strategy, will ensure the effective and efficient participation of different stakeholders.

Contractors must manage labor relations with local communities through worker Codes of Conduct (CoC). The CoC commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behavior. The CoC must include sanctions for non-compliance, including non-compliance with specific policies related to SEA/SH (e.g., termination and recourse to the legal system).

The CoC should be written in plain local language and signed by each worker to indicate that they have:

- a) A copy of the CoC was received as part of their contract.
- b) Had the CoC explain it to them during the induction process.
- c) Acknowledged that adherence to this CoC is a mandatory condition of employment.
- d) Understood that violations of the CoC can result in severe consequences, including dismissal or referral to legal authorities.

A copy of the CoC shall be displayed in a location easily accessible to the community and project-affected people. It shall be provided in Bangla.

Contractors must address the risk of SEA/SH through:

- 1) Mandatory training and awareness-raising for the workforce about refraining from unacceptable conduct toward local community members, specifically women. Training may be repeated.
- 2) Informing workers about national laws that make SEA/SH a punishable offense that is prosecuted.
- 3) Adopting a policy to cooperate with law enforcement agencies in investigating complaints about SEA/SH.
- 4) Developing a system to capture gender-based violence, sexual exploitation, and workplace sexual harassment-related complaints/issues.

5.2.11 Small, Ethnic, and Vulnerable Community Development Planning Framework

The World Bank's ESSF on small, ethnic, and vulnerable communities (SEVCs) is triggered for this Project. In compliance with ESSF 7, a Small, Ethnic, and Vulnerable Community Development Framework (SEVCDF) is elaborated below to ensure that SEVCs are sufficiently and meaningfully consulted, leading to their Meaningful Consultation on project interventions, that they have equal opportunity to share the project benefits, and that any potential negative impacts are avoided, minimized, and the residual impacts are appropriately mitigated.

The SEVCDF will form a basis for project implementation and monitoring and evaluation of how the project deals with SEVC issues. At the project implementation stage, a Small Ethnic and Vulnerable Community Development Plan (SEVCDP) will be developed, based on this SEVCDF, once the sites for project interventions are identified with all relevant information and the beneficiaries are selected from the fishers and fisheries-dependent poor and vulnerable households and results of social screening confirmed presence of SEVCs among the targeted beneficiaries. The plan will also cover mitigation measures for any kind of SEA/SH risks.

Objectives of the SEVCDP are the following:

- 1) Screen all activities to determine the presence of SEVCs and, if so, ensure their direct participation in the activities' selection, design, and implementation, including any civil works.
- 2) Select sites and interventions and determine their scopes to avoid or minimize adverse impacts to the extent feasible.
- 3) Adopt socially and culturally appropriate measures to mitigate the unavoidable adverse impacts and
- 4) Wherever feasible, adopt special measures – in addition to those for impact mitigation – to reinforce and promote any available opportunities for the socio-economic development of the affected SEV

communities.

In the Constitution of Bangladesh, all citizens are equal before the law and are entitled to equal protection. Article 27 of the Constitution of the People's Republic of Bangladesh states that all citizens are equal before the law and are entitled to equal protection of the law. The national Constitution is also against any discrimination based on race, religion, and place of birth (Article 28). It provides scope for affirmative action (positive discrimination) in favor of the backward section of citizens (Articles 28, 29). Consequent upon these provisions, a small percentage of public sector jobs and seats in several government educational institutions are reserved for SEVC people.

Nevertheless, some specific laws refer to small, ethnic, and vulnerable communities mainly focusing on the tribal peoples in the Chittagong Hill Tract (CHT) area, such as the East Bengal State Acquisition and Tenancy Act, 1950, CHT Regulation of 1900, the Hill District Council Acts of 1989, the CHT Regional Council Act of 1998, and the Persons with Disabilities Rights and the Protection Act of 2013. The operating principles of the project would consider all these laws and regulations because of the development of the SEVCs.

The total number of small ethnic community groups is also a matter of much disagreement. The 1991 census mentions 29 groups. The recently adopted Small Ethnic Minority Cultural Institution Act (April 2010) mentions 27 groups currently under revision and proposes 50 groups. Notwithstanding the confusion about the exact number of ethnic minority groups in Bangladesh, the project, for its interventions, will adopt the World Bank's criteria for identifying the small ethnic community peoples (i.e., ethnic minorities), which are as follows.

- (a) self-identification as members of a distinct small ethnic community cultural group and recognition of this identity by others.
- (b) collective attachment to geographically distinct habitats or ancestral territories in the project area and the natural resources in these habitats and territories.
- (c) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture and
- (d) a distinct language, often different from the official language of the country/ region.

Although ethnic minorities are scattered all over Bangladesh, they are overwhelmingly concentrated in several geographical pockets: the Northwest (Rajshahi & Dinajpur), the northeast (Sylhet), the central region (Dhaka and Mymensingh), and the South (Barishal & Patuakhali). The most significant concentration is in the south-eastern corner—the Chittagong Hill Tracts.

Major Ethnic Groups	Districts
Marma, Chakma, Tanchingya, Chak, Tipura, Mro, Khyang, Bawm, Pankho, Khumi	Chittagong Hill Tracts
Santal, Oraon, Munda, Pahari, Rajbansi and Koch	Rajshahi, Rangpur, Dinajpur, Pabna, and Kushtia
Khasias, Meithei, (Manipuri), Pathro and Tipra	Sylhet
Garo, Koch, Hojong	Mymensingh, Jamalpur and Tangail

The Project will generate substantial short- and longer-term benefits for the ethnic and poor, including disadvantaged men and women. The locations of the Project's physical components - roads, markets, rural waterways, and ghats –have been selected to create efficient rural transportation and socio-economic networks and to improve rural-urban connectivity.

Since the SEVCs are among the country's poorest, they will receive priority support in this project. The project will pay particular attention to the involvement of the SEVCs based on fully considering their preferred options. The project will create an opportunity for the active participation from the SEVCs at each stage of its operation. The involvement of the SEVCs in planning, implementation, and monitoring of the programs meant for their development would be the cornerstone of the SEVCDF strategy of the project.

The SEVCDP will be prepared where project intervention will cover communities, including small ethnic and vulnerable groups. The SEVCDP will consider the ethnic and demographic characteristics of the project-affected population, prevailing intuitions, such as family, religion, language, and education, as well as other small ethnic community variables and social stigmas.

This plan will accommodate the local traditional leadership (as Headman, Karbari), as well as civil and NGOs, in the implementation process of the project activities. The SEVCDP will be prepared for each village where the small ethnic minority population constitutes more than 5% of the village population. SEVCDPs will primarily aim to mitigate adverse impacts, reinforce and promote existing development opportunities in SEVC villages and the project areas, and address gender issues.

The World Bank policy on indigenous peoples requires that the development process fully respects indigenous peoples' dignity, human rights, economies, and cultures. The Bank provides project financing only where free, prior, and informed consultation results in broad community support for the project by the affected indigenous peoples. Such Bank-financed projects include measures to (a) avoid potentially adverse effects on the indigenous communities or (b) when avoidance is not feasible, minimize, mitigate, or compensate for such effects. Bank-financed projects are also designed to ensure that they receive social and economic benefits that are culturally appropriate and gender and inter-generationally inclusive.

Bangladesh recognizes the right of SEVCs to cultural expressions, education, training, health, environment, land, agriculture, water resources, infrastructure, tourism, and industry. They are generally treated equally as mainstream citizens. However, as captured in the social assessment presented in the ESMF, there are some gaps. A precise mechanism of consultation respecting the social and cultural traditions of the ethnic communities will be used in the entire cycle of the Project to seek broad support for the project from the SEVCs. A Grievance Redressal Mechanism (GRM) will also be established before the implementation of the project so that every SEVC member can bring his/her voice, complaint, or any dissatisfaction about the project.

To avoid or minimize adverse impacts and ensure culturally appropriate benefits, IAs will apply the following basic principles in selecting, designing, and implementing the subprojects.

- Ensure that SEVCs and their organizations are fully included in the project process, including identifying and selecting beneficiaries.
- Carefully screen the subprojects and SEVCs to obtain a preliminary understanding of the nature and magnitude of potential adverse impacts and explore alternatives to avoid or minimize them.
- Where alternatives are infeasible and adverse impacts are unavoidable, immediately assess the key impact issues with SEVCs and others knowledgeable of tribal culture and concerns.
- Undertake the necessary tasks to identify the impact details and the most appropriate mitigation measures through intensive consultations with the affected tribal communities, tribal organizations, civil society organizations like NGOs and CBOs, and professionals.
- Do not undertake a subproject/activity where the tribal communities remain unconvinced to offer broad support for the project.

SEVCs Participation and Consultation

SEVCs' participation in selecting, designing, and implementing project activities will largely determine the extent to which the SEVCDF objectives will be achieved. Where adverse impacts on SEVCs are likely, IAs will consult with the affected SEVCs and those who work with and/or are knowledgeable of SEVC development issues and concerns.

To ensure meaningful consultation, IAs will:

- 1) Ensure widespread participation of SEVC with adequate gender and generational representation, customary/traditional SEVC organizations, community elders/leaders, civil society organizations like NGOs and CBOs, and groups knowledgeable of SEVC development issues and concerns.
- 2) Provide them with all relevant information about the project, including potential adverse impacts. Organize and conduct these consultations to ensure complete coverage of SEVCs in the project areas and free expression of their views and preferences.
- 3) Document and share with the Bank the details of all community consultation meetings, including SEVC perceptions of the proposed works and the associated impacts, especially the adverse ones; any inputs/feedback offered by SEVCs; and the minutes stating the conditions that were agreed upon during the consultations and provided the basis for broad-based community support for the project.

Once broad-based community consensus is established in favor of the project activities, IAs will assess the impact details at the household and community levels, focusing on the adverse impacts perceived by the SEVCs and the probable (and feasible) mitigation and community development measures. To ensure continuing informed participation and more focused discussions, IAs will provide SEVCs with details of the positive and adverse impacts of the proposed project activities. The disclosure of SEVCDF will be done in the local language through face-to-face meetings and involving inter-generational representations. Times for disclosure and consultation will align with the SEVCs' available time.

Besides technical topics, consultations will cover topics/areas as suggested below and those the SEVCs consider essential. Beginning with those for broad-based support for the project activities, community consultations will continue throughout the preparation and implementation period, with an increasing focus on the households that would be directly affected. Consultation timing, probable participants, methods, and expected outcomes are suggested in a matrix in Annex XX. Project staff and implementing agencies working in the SEVC areas would be oriented towards SEVC culture and development issues to enable them to appreciate the importance of SEVC culture while working with them.

Table 11: Roles and Responsibilities of PIU

Levels	Roles and Responsibilities
Social Specialist	<ul style="list-style-type: none"> • Review relevant legal and policy frameworks and social development and safeguards planning frameworks. • Review the design and conduct subproject-level social screening, social impact assessment, and social management plan preparation. • Coordinate and facilitate, with the help of the consultant, all activities contained in SEVCDF and any social management plans. • Assist in supervising and monitoring the implementation of SMF and the subsequent social management plans. • Help affected persons and communities in the grievance resolution process involving the project GRM.

Levels	Roles and Responsibilities
	<ul style="list-style-type: none"> • Guide, assist and supervise addressing SEA/SH-related issues. • Collect data, consult the communities and targeted beneficiaries, prepare monthly progress reports, and participate in monthly review meetings. • Participate in the training program for capacity building; and • Carry out other responsibilities as required from time to time.

Grievance Redress Mechanism (GRM)

A two-tier Grievance Redress Mechanism (GRM) will be established to address grievances. The Social Specialist in the PIUs will be the contact persons for IAs. The aggrieved person can adopt the judicial procedure if the issue is not resolved. In cases where vulnerable persons cannot access the legal system, the GoB will provide legal support to the vulnerable person(s). The PIU will also assist the vulnerable person(s) get this support from the GoB. Any labor-related issues and SEA/SH-related issues will be addressed by the respective GRMs for any person from the small ethnic, and vulnerable communities following the ‘survivor-centric approach’.

The PIU will also ensure that no cost (such as travel and accommodation) is imposed on the aggrieved person if the person belongs to the vulnerable groups. The verdict of the judiciary will be final. Finally, representatives from small ethnic and vulnerable communities will be included for active participation in the GRM process both at the national and local levels. The project-specific GRM is summarized in the table below:

Table 12: The Grievance Redressal Mechanism

Tiers of GRM	Nodal Person for Contact	Facilitation by Project	Time frame to redress
First Tier: Institution-based Committee, i.e., Local-level GRC	Once the committee is created, it will be the first level of contact in specific grievances related to the management of the project or any other issue related to access and adverse impacts on the project beneficiaries	The committee will maintain a Community Information Board to record the grievance, contacting and facilitating the aggrieved person to redress	15 days maximum

Tiers of GRM	Nodal Person for Contact	Facilitation by Project	Time frame to redress
Second Tier: Project Implementation Unit (PIU)	The grievance will be forwarded to the Social Specialist at the PIU	Only after exhausting the first tier—website advertisement and public notices in print media—can the aggrieved person attend the hearing in person. The Institution’s Responsible Person will be responsible for ensuring that there is no cost imposed (such as for travel, etc.) on the aggrieved person if the person belongs to the vulnerable groups, the project will assist her/ him with travel and accommodation costs if needed	30 days maximum

Communities and individuals who believe they are adversely affected by project interventions may submit complaints to existing project-level GRM or the WB Grievance Redress Service (GRS). Project-affected communities and individuals may also submit their complaints to the World Bank’s independent Inspection Panel. For information on how to submit complaints to the WB Inspection Panel, please visit www.inspectionpanel.org. Any disclosure instrument on GRM will provide the addresses of the GRS and the Inspection Panel.

5.2.12 Resettlement Policy Framework

A standalone RPF will be prepared to address land acquisition, physical and economic resettlement and impact on informal settlers’ issues and guiding the subsequent RAP/A-RAP preparation.

5.3 Guideline for preparation of Environmental and Social Monitoring Plan

5.3.1 Monitoring Program

As one of the key elements of the ESMP, a three-tier monitoring program is proposed comprising compliance monitoring, effects monitoring and third-party monitoring. The main purpose of this monitoring program is to ensure that the various tasks detailed in the ESMP, particularly the mitigation measures, are implemented in an effective manner and also to evaluate program impacts on the key environmental parameters. Various types of ESMP monitoring are discussed below.

Compliance monitoring: The purpose of the compliance monitoring is to ensure that the contractor implements the mitigation measures given in the ESMP are effectively and in a timely implementation. This monitoring will generally be carried out by the ES Specialist of PIUs/BCAP with the help of checklists to be prepared on the basis of the Mitigation Plan.

Effects monitoring: is a very important aspect of environmental management to safeguard the protection of the environment. While the contractors are responsible for effect monitoring during the project implementation, PIUs/BCAP are responsible during operation for effects monitoring. The monitoring will comprise surveillance to check whether the contractor is meeting the provisions of the contract during construction and operation of the program including the responsible agencies for implementation and supervision.

Third Party Monitoring: DoE/BRTA/DTCA may engage an independent consulting firm to conduct external and independent monitoring of the ESMP implementation. The main purpose of the external monitoring will be to ensure that all the key entities including ES specialist of PIUs, PIUS and contractors are effectively and adequately fulfilling their designated role for ESMP implementation, and that all the ESMP requirements are being implemented in a timely and effective manner.

5.3.2 Performance Indicators

For evaluating the performance of the environmental management and monitoring plan, performance indicators are identified for efficient and timely implementation of measures/actions proposed in ESMP. The indicators are defined both for implementation phase and for post project period. ES Specialist of PIUs will be responsible for compiling the information on these indicators and report to DoE/BRTA/DTCA.

Separate performance indicators for each ES issues will be specified in the mitigation plans for the DoE/BRTA/DTCA and included in the associated ESIA. To measure the overall ES performance of the project, an additional list of performance indicators is given below.

- Number of inspections carried out by ES specialist of PIUs per month.
- Number of non-compliances observed by ES Specialist of PIUs
- Availability of environmental office with contractors.
- Timely reporting of documents (as defined in ESMP and monitoring plan).
- Number of trainings imparted to stakeholders/other capacity building initiatives.
- Timely disbursement of compensation/ timely resettlement of program affected.
- Timely implementation of resettlement schedule.
- Number of grievances received and resolved.
- Number of consultations carried out
- Number of constructions related accidents.
- Number of women, disadvantaged and vulnerable people employed.

5.3.3 Monitoring Frequency

Contractor EHSS Officers would be on site daily or otherwise defined in the ESMP's mitigation measures to inspect active work sites and verify compliance with all applicable mitigation measures for the work phase. DoE/BRTA/DTCA PIU's ES expert shall monitor the site on a biweekly/monthly basis during civil works, depending on the sub-project scope. More frequent monitoring may be conducted if needed to ensure compliance with the mitigation measures and resolution of any issues that are noted.

5.3.4 Compliance Reporting

Monthly ES Compliance Monitoring Report

During the construction period, environmental reporting will be required monthly, which will be prepared by the contractor. The monthly reports will consist of a completed environmental compliance checklist

developed using the EMP and approved by the ES Specialist of PIUs of DoE/BRTA/DTCA and WB such that actions necessary for each relevant mitigative action are identified and a summary of all actions recorded. Where a monthly report is coincident with a quarterly and semi-annual report, such monthly report shall be required but may be included with the respective quarterly and annual report.

Quarterly ES Compliance Monitoring Report

During the construction period, environmental inspections and reporting will be prepared quarterly by the contractor. The quarterly report shall consist of a completed environmental compliance checklist developed using the EMP and approved by the ES Specialist of PIUs of DoE /BRTA/DTCA together with a summary of significant items from the current and previous two monthly reports with an indication of trends, either positively or negatively. Where a quarterly report is coincident with the semi-annual report, such quarterly report shall be required but may be included with the respective semi-annual report. The ES Specialist reserves the right to increase the frequency of sampling subject to a review, which may be carried out at any time during the Construction period, and which could result in additional work for the contractor. If the additional sampling indicates that the contractor's activities have caused the need for additional sampling, then there will be no additional payment to the contractor. If it is determined by the ES Specialist that the contractor is not responsible for the need for additional sampling, then payment will be made from EMP monitoring budget. Where a quarterly report is coincident with the semi-annual report, such quarterly report shall be required but may be included with the respective semi-annual report.

Semi-annual ES Compliance Monitoring Reports

During the construction period, the ES Specialist of PIUs of DoE/BRTA/DTCA will prepare a Semi-Annual Report to include details of all environment related activities together with a summary of all tests and monitoring activities and conclusions to include assessment of effectiveness of current monitoring activities, possible changes in construction methodologies and any other thing(s) which may contribute to a reduction in environmental impact. This report is mandatory and must be submitted to WB.

The biannual report should include the following information for the period:

- Key recommended follow up issues, actions, time frame and responsibility center.
- An introduction, Reporting period and monitoring locations
- Summary of completed construction activities
- Estimate of remaining construction and schedule
- Summary of compliance activities
- Progress to date in implementing the ESMF, including key aspects monitored: such as waste management, health and safety practices, dust management, water quality, other environmental incidents and accidents, environmental awareness and training undertaken, SEA/SH orientation etc.
- Updated list of all ESHS incidents that occurred during the project, including attached notices of non-compliance that were issued
- Follow up information from any past issues that are still being resolved.

6 Grievance Redress Mechanism

Project-affected people for the proposed project's activities and any other stakeholder may submit comments or complaints at any time using the project's Grievance Redress Mechanism (GRM). An accessible and responsive complaint management process is vital to any stakeholder engagement strategy. The GRM will be accessible to all stakeholders, including affected people, community members, civil society, media, vulnerable people, and other interested parties.

External stakeholders, including international and regional, can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the proposed project. The GRM is intended to address issues and complaints efficiently, timely, and cost-effectively.

6.1 Subproject level GRM

Grievance redress committees (GRC) will be formed to receive and resolve complaints and grievances from aggrieved persons from the local stakeholders, including the project-affected persons. Based on consensus, the procedure will help resolve issues/conflicts amicably and quickly, saving the aggrieved persons from resorting to expensive, time-consuming legal actions. The procedure will, however, not pre-empt a person's right to go to the courts of law. The GRC will be established at three levels: (i) Local Level, (ii) Project level, and (iii) Ministry level.

All sub-project/local-level complaints will be received at the local-level GRC. This local-level GRC will ensure easy accessibility by the PAPs, local communities, and interested stakeholders so that any grievance can be solved directly or quickly. All cases at the local level will be heard within 15 days of their receipt.

Table 8 GRC committee at the local level

A representative from respective PIUs	Convener
Representatives from respective local government officials	Member-Secretary
Representative of the affected people	Member
Women representative of affected peoples	Member

6.2 Composition at PIU and PCMU level

If the resolution attempt at the project/local level fails, the grievance will be forwarded to the project-level GRC for further review. With active assistance from the social specialist of PIUs, the committee will decide and communicate it to the concerned GRC. The PIUs will make periodic visits to the project sites, interact with the communities and affected persons, and pick up issues of concerns, complaints, and suggestions to register with the GRM books.

The decisions on unresolved cases will be communicated to the GRC within one week of the complaint receipt. PD will be the convener, and a social specialist will be the member secretary of the project-level GRC. The members of the local GRC will be as follows.

Table 14: GRC committee at the project level

Project Director (PD)	Convener
Social Specialist at PIU	Member-Secretary
A representative from respective areas Local Women's Group	Member
A representative from respective areas PAP Group	Member

If a decision at the district level is again found unacceptable by the aggrieved person(s) or affected persons are not satisfied with the resolution, they can appeal to the line ministries for further investigation. Grievance resolution will be a continuous process in project level activities and implementation. The PIUs will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by the Bank and any other interested persons/entities. The PIUs also prepare periodic reports on the grievance resolution process and publish these on the website.

6.3 Grievance logs

To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, the resolution process, and closing procedures. The respective ministry will maintain the following three Grievance Registers:

Intake Register: (1) Case number, (2) Date of receipt, (3) Name of the complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (loss of land/property or entitlements), (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.

Resolution Register: (1) Serial no., (2) Case no., (3) Name of the complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.

Closing Register: (1) Serial no., (2) Case no., (3) Name of the complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

This project will maintain a grievance log. This log will include at least the following information:

- Individual reference number.
- Name of the person submitting the complaint, question, or other feedback, address, and/or contact information (unless the complaint has been submitted anonymously)
- Details of the complaint, feedback, or question/her location and details of his / her complaint.
- Date of the complaint.
- Name of the person assigned to deal with the complaint (acknowledge the complainant, investigate, propose resolutions, etc.).
- Details of the proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution.
- Date when the proposed resolution was communicated to the complainant (unless anonymous)
- Date when the complainant acknowledged, in writing, if possible, being informed of the proposed resolution.
- Provide details of whether the complainant was satisfied with the resolution and whether the complaint can be closed.
- If necessary, details of GRC1 and GRC2 referrals, activities, and decisions date when the resolution is implemented (if any).
- If APs are unsatisfied with the resolution, they can appeal to the Ministry for further investigation. Even if the case is not resolved with the Ministry, it can appeal to court according to the law of the land.

6.4 Monitoring and Reporting on Grievances

The concerned person in the PIUs will be responsible for issuing regular (e.g., monthly/quarterly) reports that can only contain data such as the total number of allegations, the number of alleged perpetrators who are related to the project, the type of incident, the age and sex of survivors, and the referral status.

6.5 Points of Contact

Besides the respective PIUs, the communities within the project areas and individuals who believe that they are adversely affected by a project supported by the World Bank may also complaints directly to the Bank through the Bank's Grievance Redress Service (GRS) (<http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>).

A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA

7 STAKEHOLDER CONSULTATION AND DISCLOSURE

Meaningful consultations with stakeholders are critical to the Bangladesh Clean Air Project. Aligned with the World Bank’s Environmental and Social Framework (ESF), especially ESS10 on Stakeholder Engagement, the project ensures transparent, inclusive, and culturally respectful community engagement, free from manipulation or discrimination, to support informed and meaningful participation throughout the project, committed to providing transparent, inclusive, and culturally respectful community engagement.

This commitment, free from manipulation or discrimination, is designed to support informed and meaningful participation throughout the project, and we hope it instills confidence in the project's integrity. A standalone Stakeholder Engagement Plan (SEP) is prepared and will be disclosed for feedback.

This SEP is a crucial component of the project, as it defines a comprehensive program for stakeholder engagement, including public information disclosure and consultation throughout the project cycle. It outlines how the BRTA, DTCA, and DOE will communicate with stakeholders and includes a mechanism for people to raise concerns, provide feedback, or complain about the project and any related activities. The SEP emphasizes methods to engage groups considered most vulnerable and at risk of being excluded from project benefits, ensuring that all voices are heard and believed in the project's implementation.

7.1 Methodology and Tools for the Consultation

The following stakeholders have been identified and analyzed per project component: affected parties, other interested parties, and disadvantaged/vulnerable individuals or groups.

Table 15: Stakeholder Identification and Analysis per Project Component

Component	Implementing Agency	Stakeholders	Analysis
Component 1: Strengthening Air Quality Governance	DOE, NBR and LGD	Public Sector: Local Administration, Local Government Representatives, and other Government Officials, Environmental Protection Authorities, and Health Authorities. (e.g., Dhaka South City Corporation, Dhaka North City Corporation, Gazipur City Corporation, BRTC, NBR, DoE, Ministry of Information and Broadcasting, Power Division, Armed Forces Division, Ministry of Fisheries and Livestock, Bangladesh Hi-Tech Park Authority, RTHD, Forest Department, DSHE, Sustainable and Renewable Energy	They oversee and coordinate development activities, ensure regulation compliance, and safeguard public health and environmental integrity.

		<p>Development Authority, DPHE, ERD, Finance Division, Health Services Division, BPDB, AG Office, ICTD, SHED, Ministry of Commerce, DTCA, National Skill Development Authority, Press Information Department, Ministry of Industries, BRTA, BCSIR, NIPSOM, BSTI, Bangladesh Betar, HBRI, Ministry of Shipping, BNF, DMTCL, IDCOL)</p> <p>Private Sector: Bangladesh Brick Manufacturing Owners Association, Bangladesh Steel Manufacturers Association, Bangladesh Steel Mills Owners Association, Bangladesh Auto Brick Manufacturers Association, Bangladesh Independent Power Producers Association, Bangladesh Solar and Renewable Energy Association, Bangladesh Cement Manufacturers Association)</p> <p>Civil Society: BAPA, Academia, icddr,b, BELA, Paribesh O Jalabayu Paribartan Andolan (Environment and Climate Change Movement), MIST, Nature Conservation Management, UNIDO, UNDP, BIDS, and Media)</p>	<p>Stand to benefit from enhanced infrastructure, increased employment opportunities, and improved service provision, contributing to local economic development.</p> <p>Among the most affected are older adults, women, children, persons with disabilities, small ethnic communities, and laborers.</p>
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			Suppliers, Contractors, and Laborers: Their role is imperative in implementing project activities.
Component 2: Reducing emissions from the transport sector	BRTA and DTCA	<p>Public Sector: Ministry of EFCC, Ministry of Industries, Ministry of Home Affairs, Ministry of Commerce, RHD, Power Division, Bangladesh Police, DOE, Dhaka North and South City Corporations, and LGD.</p> <p>Private Sector: <i>Jatri Kalyan Samity</i> (Passengers Welfare Society), <i>Nirapad Sarak Andolan</i> (Safe Road Movement), Road Transport Labour Federation, Truck Driver Labour Federation, Bus and Truck Owner's Association, Truck And Covered Van Owners Association, Reconditioned Vehicles Importers and Dealers Association, Manufacturers and Merchants Association, and Covered Van and Truck Prime Mover Goods Transport Owners Association.</p> <p>Civil Society: Academia, Media, CSOs.</p>	(as above)

7.2 Consultation and Communication Guideline

A series of consultations took place during the preparation of the ESMF.

Table 16: Summary of Consultation Meetings

SI	Date	Venue	Main Participant Groups	No. of Participants		Key Issue Discussed
				Male	Female	
1	12 th December 2024	The World Bank	Government Agencies, Leaders of different relevant Associations, Academia, CSOs, and Korean Government Agencies			<ul style="list-style-type: none"> Proposed activities of the project Korean experience Issues to be considered acknowledging private sector actors' engagement National policies and practices Technological options/alternatives
2	14 th January 2025	BRTA Office, Rangpur	BRTA, DoE, private sector actors, and landowners	24	0	<ul style="list-style-type: none"> Proposed project activities Considering private sector actors issues/challenges
3	26 th January 2025	The World Bank	Journalists	11	1	<ul style="list-style-type: none"> Proposed activities of the project Engagement of media
4	29 th January 2025	DoE	Government Agencies, Leaders of different relevant Associations, Academia, CSOs, and media	101	19	<ul style="list-style-type: none"> Proposed activities of the project Issues to be considered acknowledging private sector actors' engagement National policies and practices Technological options/alternatives

SI	Date	Venue	Main Participant Groups	No. of Participants		Key Issue Discussed
				Male	Female	
5	11 th February 2025	DTCA	Government Agencies, Leaders of different relevant Associations, Academia, CSOs, and media	33	5	<ul style="list-style-type: none"> Proposed activities of the project Issues to be considered acknowledging private sector actors' engagement National policies and practices Technological options/alternatives
6	19 th February 2025	BRTA	Government Agencies, Leaders of different relevant Associations, Academia, CSOs, and media	XX	XX	<ul style="list-style-type: none"> XXX

The SEP outlined the engagement process and methods, including sequencing, topics of consultations, and target stakeholders. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

Table 17: SEP Summary Table

Stage	Target Stakeholders	Topic(s) of Engagement	Method(s) Used	Location/Frequency	Responsibilities
STAGE 1: Project Preparation	Project Affected People: Affected people residing in the project area, Vulnerable households	ESMF, LMP, SEP, ESCP, SEVCDF, Gender and SEA/SH action plan and RPF; Project scope and rationale; Project E&S principles, Grievance mechanism process	Public meetings, separate meetings for women and vulnerable groups, Face-to-face meetings, Mass/Social media communication (As needed), Disclosure of	Quarterly meetings at project sites and as various components are executed and put into operation, continuous communication through mass/social media and routine interactions.	BRTA, DTCA, DOE

Stage	Target Stakeholders	Topic(s) of Engagement	Method(s) Used	Location/Frequency	Responsibilities
			Written information: brochures, posters, flyers, website Information boards or desks, Grievance mechanism, Local newspaper		
	Other Interested Parties (External)-NGO working in waste management, climate resilience issues and GBV sectors	ESMF, LMP, SEP, ESCP, SEVCDF, Gender and SEA/SH action plan, and RPF. Project scope, rationale, and E&S principles, Grievance mechanism process	Face-to-face meetings Joint public/ community meetings with PAPs	Quarterly meetings with affected communities. Disclosure meetings at local and national levels	BRTA, DTCA, DOE
	Other Interested Parties (Internal) Press and media Local NGOs, Different Government Departments having link with project implementation	ESMF, LMP, SEP, ESCP, SEVCDF, Gender and SEA/SH action plan and RPF; Grievance mechanism, Project scope, rationale, and E&S principles	Public meetings, trainings/workshops (separate meetings specifically for women and vulnerable people as needed), Mass/social media communication, Disclosure of written information: Brochures, posters, flyers, website Information boards, Grievance mechanism Notice board for employment recruitment	Project launch meetings with relevant stakeholders and in affected locations/communities as needed. Communication through mass/social media (as needed) Information desks with brochures/posters in affected villages (continuous)	PIUs

Stage	Target Stakeholders	Topic(s) of Engagement	Method(s) Used	Location/Frequency	Responsibilities
	Other Interested Parties (External) Other Government Departments from which permissions/clearances are required. Business people, Contractors, and suppliers	Legal compliance issues, Project information scope and rationale and E&S principles, Coordination activities, Grievance mechanism process, ESMF, LMP, SEP, ESCP, SEVCDF, Gender and SEA/SH action plan and RPF	Face-to-face meetings, Invitations to public/community meetings, Submission of required reports	Disclosure meetings, Reports as required	PIUs
STAGE 2: Implementation Phase	Project Affected People, including Vulnerable community	Grievance mechanism Health and safety impacts (RAP, ESMP, ESIA community H&S, community concerns) Employment opportunities Project status	Public meetings, open houses, trainings/workshops, and Separate meetings as needed for women and vulnerable groups. Individual outreach to PAPs as needed. Disclosure of written information: brochures, posters, flyers, website Information boards. Notice board(s) at construction sites Grievance mechanism	Quarterly meetings during the construction phase. Communication through mass/social media as needed. Notice boards are updated weekly. Routine interactions Brochures in local offices	PIUs

Stage	Target Stakeholders	Topic(s) of Engagement	Method(s) Used	Location/Frequency	Responsibilities
			Local monthly newsletter		
	Other Interested Parties (External)	Project scope, rationale, and E&S principles Grievance mechanism Project status	Face-to-face meetings Joint public/community meetings with PAPs	As needed (monthly during the construction phase)	PIUs
	Other Interested Parties, (External) Press and media, Various Government Departments	Project information- scope and rationale and E&S principles, Project status, Health and safety impacts, Employment opportunities, Environmental concerns, GBV-related consultation, Grievance mechanism process	Public meetings, open houses, trainings/workshops Disclosure of written information: brochures, posters, flyers, website, Information boards, Notice board(s) at construction sites. Grievance mechanism, GBV-related issues would be handled, and awareness of the issue, including change of mind on the	The same is for PAPs/ at regular intervals throughout the project period to educate and raise awareness amongst the population about the pitfalls of GBV and make them capable of addressing GBV in their respective communities	PIUs

Stage	Target Stakeholders	Topic(s) of Engagement	Method(s) Used	Location/Frequency	Responsibilities
			<p>matter by the society at large, would be addressed by implementing agencies, including NGOs, NGOs specifically working on GBV matter, local leadership, religious leaders, elders including women representatives, teacher at the local schools and Madrassas.</p>		
STAGE 3: Operation and Maintenance	The project Affected People, including vulnerable community	Satisfaction with engagement activities and GRM Grievance mechanism process	Outreach to individual PAPs, PIUs website, Grievance mechanism, Newsletter	Outreach as needed. Meetings in affected people and villages (as needed/ requested)	PIUs
	Other Interested Parties (External), Press and media, NGOs linked with the GBV issue, Various Government Department, local people, et al.	Grievance mechanism, Issues of concern Status, and compliance reports	Grievance mechanism PIUs websites, Face-to-face meetings Submission of reports as required	As needed	PIUs

7.3 Information Disclosure

The draft ESMF report of BCAP will be disclosed to the local and national level stakeholders through different methods as described below.

Workshop: A national workshop will be held at Dhaka to present the detailed project, including ES aspects of BCAP to the key stakeholders. The workshops will also help to resolve conflicting issues among stakeholders. Besides, FGDs and personal interviews will be carried out at all selected sites of the BCAP project area to generate communities' views and concerns.

Availability of the Document: Summary of the ESIA and ESMF report along with ESMPs will be translated into Bengali language and disseminated locally. The full report (in English) and the summary (in Bengali) will also be uploaded to the website of DoE, BRTA, DTCA and WB.

8 Project Institutional and Implementation Arrangement

DOE, BRTA, and the DTCA will implement the project through three Project Implementation Units (PIUs). The PIUs will coordinate all activities at the field level. The rationale for adopting the proposed implementation structure is to follow the mandate of government agencies, be in line with the rules of business and coordination, and enable the most efficient decision-making, considering internal government fiduciary clearance procedures. Although the project is now at the preparation stage, the most likely institutions that would be involved are as follows:

8.1 The Implementing Agencies (IAs) and Project Implementation Units (PIUs)

DOE, BRTA, and DTCA are the project implementation agencies. They manage the project's E&S risks, including implementing ESMP, SEP, LMP, SEVCDF, Gender, and SEA/SH Action Plan, and RPF through its existing structures.

DOE will be the implementing agency of Component 1. DOE-PIU will have a dedicated Project Director and one DPD. As the BEST-PIU is currently implementing similar activities, this existing PIU of BEST will be strengthened to implement the activities proposed under the proposed Project. Key E&S staff expected are a Senior Environmental Specialist, a Senior Social Development Specialist, a Gender Specialist, a Communications Specialist, and an M&E Specialist. A Design and Supervision and Monitoring and Evaluation firm will be hired.

BRTA will be partially the implementing agency of Component 2. BRTA-PIU will have a dedicated Project Director and one DPD. As the BEST implements similar activities, this existing PIU of BEST will be strengthened to implement the proposed project interventions. Key E&S staff to be augmented are a Senior Environment Specialist, a Senior Social Specialist, a Communication Specialist, an M&E Specialist, and a Gender Specialist.

DTCA will be the implementing agency for the remaining parts of Component 2. Key E&S staff to be augmented are the Environment Specialist, Social Development Specialist, Gender Specialist, and Communication Specialist.

IAs, as appropriate, will also hire a Design and Supervision (D&S) Firm, which will include an Environmental Team and a Social Team responsible for carrying out the environmental and social assessments, preparing all necessary E&S documents, and monitoring the implementation of the E&S requirements.

8.2 Project Steering Committee (PSC)

Following the Government's Rules of Business, the PIUs of BRTA and DTCA will report to their respective Ministerial Project Steering Committee (PSC), chaired by the respective Sr. Secretary/Secretary of the MoRT&B. The PSC for DOE will be chaired under the Sr. Secretary/Secretary of MoEF&CC.

The PSCs will include representatives from ministries, divisions, departments/agencies that are part of overall implementation, coordination, and strategy. The PSC will be responsible for (i) providing implementation advice and operational guidance, (ii) reviewing financial and physical progress, (iii) resolving implementation problems, and (iv) providing any other necessary direction for effective implementation. The PSC will meet at least every six months.

8.3 Project Implementation Committee (PIC)

Each project implementation agency will have a Project Implementation Committee (PIC) chaired by the head of the agency. The PIC will assist in supervising the respective components and must include relevant representatives from ministries, divisions, departments/agencies. The PIC will ensure that implementation follows Government and Bank rules and regulations.

Specifically, the PIC will be responsible for (i) supervising and reviewing implementation and providing necessary advice for timely delivery; (ii) monitoring and evaluating implementation progress and suggesting necessary course corrections; (iii) resolving issues and conflicts that may emerge during implementation; (iv) facilitation coordination and convergence with other line ministries, division, and departments/agencies; and (v) keeping the PSC apprised on overall performance and key issues relating to the project.

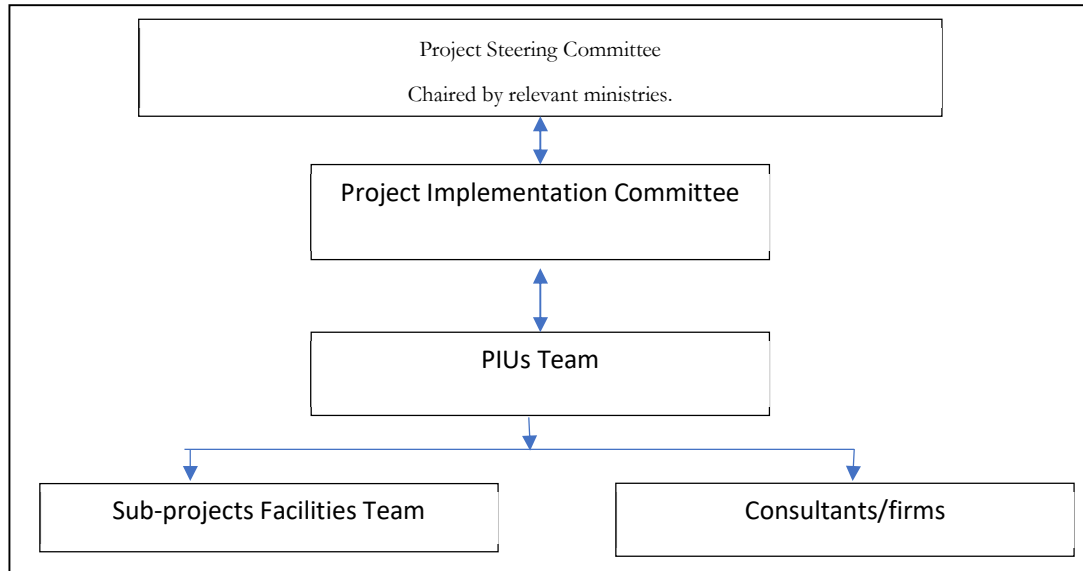


Figure 5: Overall Institutional Arrangements

The Project will use the GoB's existing arrangements for all implementation, coordinated through the existing government mechanism. This will comprise compliance and sub-project monitoring, training, and administrative systems development and management.

To ensure the proper management of environmental and social aspects under the Project, field-level officers will be responsible for liaising with the respective agencies at the central level and other entities that may be subcontracted and ensuring that the Bank's policies are adhered to. Similar arrangements will have to be established at every layer of contracting. The PIUs may be strengthened with additional staff as required and as agreed upon by the bank. IAs will prepare separate monitoring reports and share them with the World Bank quarterly.

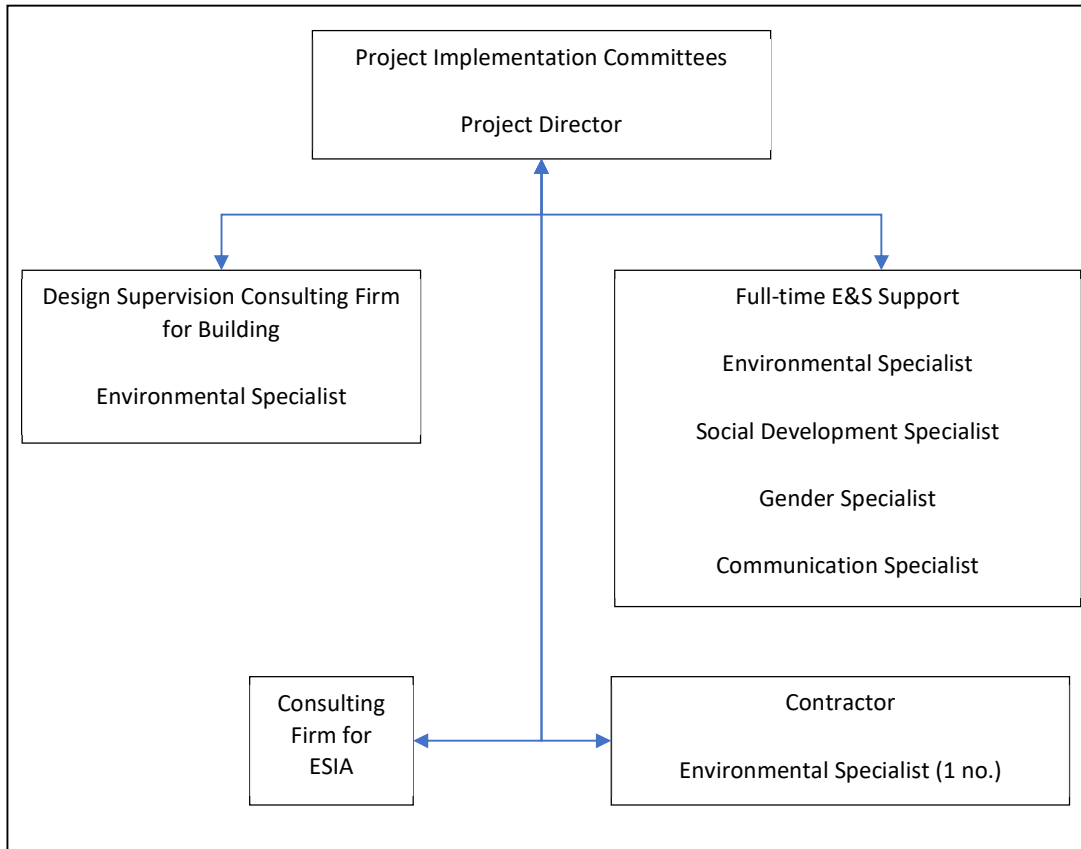


Figure 6: PIUs Institutional Arrangements

8.4 Roles and responsibility of Contractors

Contractors will need to follow the LMP as referred to in the ESMF to cover all requirements of ESS2. The LMP includes the assessment of risks and impacts and required mitigation measures to ensure the health and safety of the contractor’s workers who may be exposed to health risks. The LMP directs contractors to localize the economic benefits with minimal opportunities for outside labor to service work that requires specialized/skilled labor that is not present in project localities. Besides this, the Contractor will be required to write, adopt, and implement a written Labor Management Plan as part of the bidding document and contract before employing any labor in the work.

Contractors need to address issues such as child labor, forced labor, gender and GBV issues, occupational health and safety specified in the bidding and contract documents, as well as ensuring required training and awareness programs. Adequate OHS protections per EHSGs and GIIP will also be required to be implemented by contractors. To ensure the health and safety of workers during construction, contractors must prepare and implement an Occupational Health and Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety Guidelines, and local legislation. Contractors must also prepare and implement site-specific Environmental and Social Management Plans (ESMPs). The contractors need to implement a specific Grievance Redress Mechanism (GRM) for the workers, as referred to in the LMP sub-section.

8.5 Specialist Responsibility

Environmental Specialist

PIUs will have a dedicated Senior/Environmental Specialist to ensure the implementation of ESIA's, site-based ESMPs, ESMF, and other environmental responsibilities, including occupational health and safety issues. S/he will maintain liaison with IAs and others during the Project implementation. S/he will organize training activities for stakeholders. S/he will also monitor project activities to ensure environmental mitigation measures are correctly implemented. S/he will prepare monitoring reports as directed by the Project Director.

Social Development Specialist

The PIUs will have dedicated Senior/Social Development Specialists to ensure the implementation of ESMP and other social management responsibilities. They will maintain liaison with WB E&S team, regulatory agencies, and other stakeholders during the project implementation. The Specialists will also monitor construction activities to ensure that social mitigation measures are properly implemented.

Gender Specialist

The PIUs will have a dedicated Gender Specialist to ensure the implementation of gender and SEA/SH-related responsibilities. During the project's implementation, the specialist will maintain liaisons with the WB E&S team, regulatory agencies, and other stakeholders. The Specialist will also monitor whether gender and SEA/SH aspects of construction activities are appropriately implemented.

Communication Specialist

A Communication specialist will be hired at PIUs to implement SEP.

Contractor's Environment Supervisor

The construction contractors should assign a dedicated, appropriately qualified, and experienced site-based Environment Supervisor (ES) at the construction site. The ES will be responsible for implementing various aspects of the ESMP, particularly the mitigation measures to ensure that the environmental and social impacts and the health and safety issues of the construction works remain within acceptable limits.

The ES will also be responsible for conducting environmental training for the construction crew. The ES needs to be a graduate, preferably in environmental science/engineering, with at least three years' experience in environmental management and health and safety.

Contractor's Social Officer

The contractor shall have a social officer on site who will be responsible for implementing all social issues, gender, and labor issues according to the guidelines of the PIU/social firms E&S team. PIUs, with the support of social specialists and social firms, will ensure that all contractor workers and counterparts involved in project implementation receive both initial and ongoing social and gender awareness and training sufficient to ensure they are familiar with their social responsibilities under the ESMP.

Environmental and Social Support Firms

These firms shall support the PIU (and their consultants) by independently supervising environmental and social-related activities in the field. The firm will provide all necessary training to the contractors.

Supervision Consultant

This consultant shall ensure that the design of all physical works considers environmental and social considerations.

Monitoring and Evaluation Consultant

This consultant shall carry out independent monitoring and evaluation of monitoring items as identified; in particular, the consultant shall evaluate the training records, GRM register, and ESMP monitoring documents.

8.6 Capacity Building

Environmental and social training will help ensure that all project personnel understand and follow the ESS requirements and subsequent social issues throughout the project period. The PIUs will ensure, in collaboration with the PSCs, that these training sessions are provided to all project personnel.

The social and environmental training program will be finalized before the project commences. The training will be provided to the relevant ministry’s representatives, staff, contractors, NGOs, and other project staff.

Training will cover all staff levels, from management and supervisory to the skilled and unskilled categories. The scope of the training will cover general environmental and social awareness, key environmental and social impacts of the program, ESMP requirements, OHS aspects, and GBV. Different training programs that can be realigned based on the needs will be initiated. A tentative training program for the project is shown in the Table below.

Table 18: Proposed Training and Capacity Building Approach

Contents	Participants	Responsibility	Schedule
Introduction to World Bank ESF	PIUs implementing agency and contractors	World Bank and line ministries	Before the start of the Project activities.
ESF guidelines and ESMF	PIUs implementing agency and contractors/ NGOs	line ministries with the support of the WB team	Before the start of the Project activities.
Screening method, social survey procedures, ESMP preparation	representative of line ministries representatives; PIUs, Consulting firms/NGO	PIUs E&S specialist	Before the start of the Project activities.
Training on ESS2, ESS10, and ESS5 (labor and working conditions, resettlement, stakeholder engagement, etc.)	PIUs. Selected contractors’ crew	PIUs	Before the start of the field activities.
Preparation and review of ESMF, SEP, RPF	PIUs. Design, Monitoring, and supervision consultant	PIUs	Before the start of the field activities.

Contents	Participants	Responsibility	Schedule
Grievance Mechanism and Handling Procedures	Contractors, PIUs, consulting firms/NGOs, Contractor	PIUs	Before the start of the construction activities. (To be repeated as needed)
Internal and External Monitoring procedures and reporting	PIUs and INGO/consulting firms, contractors	PIUs	Before and during the construction activities. (To be repeated as needed)
Occupational Health & Safety: ESMP implementation; GBV/SEA/SH; Workplace risk management; Prevention of accidents at work sites; Health and safety rules; Solid and liquid waste management; Traffic and Road Safety; Preparedness and response to emergency situations	Officials of IAs, locally active NGOs, Civil Work Contractors, Workers	PIUs	Before mobilization of project staff and workers/ contractors
GBV Risk Module Raising awareness and measures to prevent and mitigate GBV/SEAH risks. The topics and activities will be developed and included in the Project GRM	IA Local officials, Contractors, Health Safety Officers, Labor Sardars (Leaders), Local NGOs, OCC Staff	PIUs	Within six months of Project effectiveness and thereafter, yearly
Waste Sub-projects management crew will be trained for operation and maintenance, with a special focus on the safe disposal of wastewater and hazardous wastes (e.g., solid and liquid wastes), including necessary training and awareness on sanitation technology and management	Waste Management Team of the HCFs' staff	PIUs	Upon assignment of waste management crew/ firm/

8.7 Guidelines for Bid Documents

Interested firms will prepare bid documents for ESMF-related documents that need to incorporate relevant items from the ESMF and ESMPs. All the ESMF-related documents will be inserted with the bid documents and external monitor.

Therefore, during preparation of tender documents, the PIUs need to ensure that:

- Tender documents (specifications and BOQs) include all relevant E&S documents, including RPF, SEP, ESMF, and ESMP items relevant to contractors and firms.
- Provide clear information to potential bidders regarding social considerations for the work package(s).
- The instructions to bidders should mention the submission of supporting documentation/materials describing previous experience and a track record on both environmental social requirements and implementation.
- Criteria for evaluating submitted bids should include adequate preparation of both environmental and social documents, implementation responses, and costing.

8.8 Monitoring

PIUs will regularly monitor and evaluate the updating and implementation of the ESMF. Monitoring and evaluation are intended to help ensure that the resettlement action plan (RAP) is prepared and implemented according to the resettlement policy framework (RPF).

The objective of the monitoring framework is to ensure that the mitigation measures are designed to prevent, reduce, and, where possible, offset any significant adverse environmental and social impacts throughout the project lifecycle.

Moreover, the external project monitor will review all the E&S documents prepared for this project. The external monitor will establish a dialogue with the affected communities and ensure that their concerns and suggestions are incorporated and implemented in the project.

The external monitor will work closely with the PIUs and internal monitoring team to implement the ESMP and other plans. He or she will prepare training programs and workshops for the PIUs' and contractors' staff.

In addition to internal monitoring, an external (or independent) monitor will be engaged to provide a periodic independent evaluation of ESIA and other plans' implementation and impacts, verify internal reporting and monitoring, and suggest adjustments to delivery mechanisms and procedures as required.

To function effectively, the organization responsible for external monitoring should be independent of the governmental agencies involved in resettlement implementation. Regular external monitoring should begin along with implementation activities and continue until the end of the project.

The following activities are the standard functions of the external monitors:

Verification of internal reports by field check

- Interview a random sample of PAPs in open-ended discussions to assess their knowledge and concerns.
- Participate as an observer in public consultations for PAPs at the project level. (Organizing these meetings is the responsibility of the implementing agency)
- To assess effectiveness and compliance with the ESMF.
- Check the type of grievance issues and the functioning of grievance redress mechanisms by reviewing appeals' processing at all levels and interviewing aggrieved PAPs.
- Advise the project management unit (PMU) regarding possible improvements in the implementation of the ESMF.

PIUs will establish procedures to monitor and evaluate the plan's implementation and will take corrective action as necessary during implementation to achieve the ESS objectives. The extent of monitoring activities will be proportionate to the project's risks and impacts.

For this project, PIUs will ensure competent professionals to monitor the implementation of ESMF, design corrective actions as necessary, and NGO/consulting firms on compliance with ESS and periodic monitoring reports will be prepared, and affected persons will be informed about monitoring results on time.

Table 20: Monitoring process of key indicators

Monitoring Aspects & Relevant ESS	Potential Indicators
Consultation ESS1, ESS5, ESS10	<ul style="list-style-type: none"> • A strategy for consultation and information disclosure has been prepared. • Consultations organized as scheduled. • Project information is disclosed. • Affected, interested, disadvantaged, and vulnerable groups are identified. • Views of disadvantaged and vulnerable groups are considered during the entitlement design, and special measures are taken. • Schedules are planned for the various stakeholder engagement activities. • Knowledge of entitlements by the relevant stakeholders, including project-affected people.
Grievances ESS2, ESS4, ESS5, ESS10	<ul style="list-style-type: none"> • Operationalization of the grievance redress mechanism proposed with ESMF. • Operationalization of the GRM for Labor and GBV/SEA/SH. • Information on the resolution of the grievances. • Process by which people affected by the project can voice their grievances and concerns. • Process to document complaints and concerns. • Grievance recording (e.g. MIS, grievance logbook). • Stipulated timeframes for acknowledgment and resolution of complaints. • Encourage awareness raising to inform stakeholders about the GRM and appeals process. • Grievance reports published and frequency.
Communications and Participation ESS10	<ul style="list-style-type: none"> • Number of general meetings (for both men and women). • Percentage of women out of total participants. • Number of meetings exclusively with women. • Number of meetings exclusively with vulnerable groups. • Number of meetings at new sites. • Number of meetings between host communities and the DRPs. • Level of participation in meetings (of women, men, and vulnerable groups). • Level of information communicated—adequate or inadequate. • Information disclosure. • Translation of information disclosure in the local languages.
Budget and Time Frame ESS1, ESS5	<ul style="list-style-type: none"> • Social Development Specialist appointed and mobilized on schedule for the field and office work. • Capacity building and training activities completed on schedule.

Monitoring Aspects & Relevant ESS	Potential Indicators
	<ul style="list-style-type: none"> Achieving resettlement implementation activities against the agreed implementation plan. Funds allocation for resettlement to implementing agencies on time. Receipt of scheduled funds by resettlement offices. Funds disbursement according to the resettlement action plan. Social preparation phase as per schedule.
Contractors and sub-contractors ESS2	<ul style="list-style-type: none"> Setting a special scoreboard approach based on the activities accomplished during project intervals. Project parties and laborers are also based on the set criteria.
Implementation of mitigation measures ESS1, ESS2, ESS3, ESS5, ESS4, and ESS10	<ul style="list-style-type: none"> Environmental and social monitoring parameters as per approved ESMPs based on subproject screenings and/or ESIA's

ESMF monitoring will be carried out to ensure that the mitigation measures and plans are regularly and effectively implemented. The PIU environment and social specialists will conduct regular field visits to ensure that the mitigation plans are being effectively implemented.

Table 21: ESMF Monitoring Plan

What	When	Who	How
Preparation phase			
Training and Capacity Building Activities	Before the preparation of tender documents	PD with Environmental and Social Support Firms	Review Training Records
Ensure Screening of Environmental and Social Issues	After locations and alignments are confirmed by the PD	PIUs with Environmental and Social Firms	Review completed Screening Sheets
Construction phase			
Training and Capacity Building Activities	Monthly	PD with Environment and Social Firms	Review Training Records
Grievances Records	Monthly	PD with Environment and Social Firms	Review GRM register

What	When	Who	How
Preparation phase			
Environmental and social mitigation/ enhancement measures (including health and safety measures) are outlined in the ESMP and incorporated in the tender bidding documents and the approved contracts	Monthly	PD with Environment and Social Firms	Review ESMP monitoring documents
Operation and maintenance phase			
Grievances Records	Monthly	PIUs	Review GRM register
Environmental and social mitigation/ enhancement measures (including health and safety measures) outlined in the ESMP	Monthly	PIUs	Review ESMP monitoring documents

8.9 Reporting

The PIUs will prepare a monthly report will summarize the following:

- Progress in implementing this ESMP and subsequent other E&S documents, etc.
- Findings of the monitoring programs, emphasizing any breaches of the control standards, action levels, or standards of general site management.
- Summary of any complaints by external bodies and actions taken / to be taken; and
- Relevant changes or possible changes in legislation, regulations, and international practices.

Table 22: Reporting Requirements

Report/ Document	Description	Prepared By	Submitted To	When
Training Records	Register of all Training and Capacity Building activities conducted under the project	PIUs; Consultants	PD	Within 3 weeks of any training/capacity-building activity
Completed E&S Screening Forms	Identifies Potential Environmental and Social Issues	PIUs; Consultants	PD	After completing forms
GRM Records	Register of grievances received and actions taken	GRC or Consultants during the construction phase and then the relevant Implementing Agency officer thereafter	PD	Monthly

Report/ Document	Description	Prepared By	Submitted To	When
Internal Monitoring	Monitoring data as defined in the ESMF	PIUs and/or Consultants	PD	Monthly
External Monitor	Monitoring data as defined in the ESMF	External monitor	World Bank	Every quarter

8.10 Capacity Building

Environmental and social training will help ensure that all project personnel understand and follow the ESS requirements and subsequent social issues throughout the project period. The PIUs will ensure, in collaboration with the PSCs, that these training sessions are provided to all project personnel.

The social and environmental training program will be finalized before the project commences. The training will be provided to the relevant ministry's representatives, staff, contractors, NGOs, and other project staff.

Training will cover all staff levels, from management and supervisory to the skilled and unskilled categories. The scope of the training will cover general environmental and social awareness, key environmental and social impacts of the program, ESMP requirements, OHS aspects, and GBV. Different training programs that can be realigned based on the needs will be initiated. A tentative training program for the project is shown in the Table below.

Table 23: Proposed Training and Capacity Building Approach

Contents	Participants	Responsibility	Schedule
Introduction to World Bank ESF	PIUs implementing agency and contractors	World Bank and line ministries	Before the start of the Project activities.
ESF guidelines and ESMF	PIUs implementing agency and contractors/ NGOs	line ministries with the support of the WB team	Before the start of the Project activities.
Screening method, social survey procedures, ESMP preparation	representative of line ministries representatives; PIUs, Consulting firms/NGO	PIUs E&S specialist	Before the start of the Project activities.
Training on ESS2, ESS10, and ESS5 (labor and working conditions, resettlement, stakeholder engagement, etc.)	PIUs. Selected contractors' crew	PIUs	Before the start of the field activities.
Preparation and review of ESMF, SEP, RPF	PIUs. Design, Monitoring, and supervision consultant	PIUs	Before the start of the field activities.

Contents	Participants	Responsibility	Schedule
Grievance Mechanism and Handling Procedures	Contractors, PIUs, consulting firms/NGOs, Contractor	PIUs	Before the start of the construction activities. (To be repeated as needed)
Internal and External Monitoring procedures and reporting	PIUs and INGO/consulting firms, contractors	PIUs	Before and during the construction activities. (To be repeated as needed)
Occupational Health & Safety: ESMP implementation; GBV/SEA/SH; Workplace risk management; Prevention of accidents at work sites; Health and safety rules; Solid and liquid waste management; Traffic and Road Safety; Preparedness and response to emergency situations	Officials of IAs, locally active NGOs, Civil Work Contractors, Workers	PIUs	Before mobilization of project staff and workers/ contractors
GBV Risk Module Raising awareness and measures to prevent and mitigate GBV/SEAH risks. The topics and activities will be developed and included in the Project GRM	IA Local officials, Contractors, Health Safety Officers, Labor Sardars (Leaders), Local NGOs, OCC Staff	PIUs	Within six months of Project effectiveness and thereafter, yearly
Waste Sub-projects management crew will be trained for operation and maintenance, with a special focus on the safe disposal of wastewater and hazardous wastes (e.g., solid and liquid wastes), including necessary training and awareness on sanitation technology and management	Waste Management Team of the HCFs' staff	PIUs	Upon assignment of waste management crew/ firm/

8.11 Budget for ESMF implementation

Below is a proposed budget for implementing this ESMF. Once the ESMF has been finalized, this may be changed/updated.

Table 19: Tentative ESMF Implementation Budget

Items	Man-month	Total (in USD)
Social Development Specialist	36	90,000
Environmental Specialist	36	90,000
Gender Specialist	24	60,000

Items	Man-month	Total (in USD)
Communication Specialist	60	180000
Consulting firm for ESIA/ESMP and RAP, etc., preparation and implementation	Lump-sum	160,000
External Monitor	24	100,000
Capacity Building for PIU, NGO/consulting firm, Contractors	Lump-sum	100,000
Grievance handling cost	Lump-sum	40,000
Total		890,000

Annexure

Annex I: Gap Analysis of World Bank Requirements and National Laws

A gap analysis between the WB's ESSs and GoB Regulations was conducted as part of the BCAP ES capacity assessment in light of the Overview Assessment of Bangladesh's Country Framework for Addressing Environmental Risks and Impacts of Development Projects (September 2021). The results of the gap analysis indicated that the Bangladesh EIA System has a few material gaps with respect to the WB ESS1.

Foremost among these are: (i) it does not cover many of the issues relating to other WB ESS; (ii) the stakeholder engagement during the EIA study is almost non-existent or very limited, needless to say, that there is no requirement to engage stakeholders during construction; (iii) it does not emphasise the application of mitigation hierarchy in selecting mitigation measures; (iv) it recognises only Initial Environmental Examination (IEE) and Environmental Impact Assessment (EIA) and does not provide for other assessment instruments, particularly SEA, REA and cumulative assessment; and, (v) it does not require analysis of alternatives.

It has also a few problems of its own when compared to a standard EIA system, including: (i) it does not provide any formal definition of the projects to be required the Environmental Clearance--the law only refers to "industry" and "industrial units"; (ii) the screening process is inadequate--there is no procedure or criteria for determining which category a project would fall into; and (iii) it does not have formal procedure for compliance monitoring and reporting. Although there are suggestions in the EIA Guidelines on these issues, the Guidelines do not have the same compelling effect as the force of law or regulation. There is no assurance that each ES Standard (1-8 and 10) are considered in the EIA study and the formulation of the ESMP. Although the EIA is heavy on environmental aspects, more and more social issues are incorporated into the assessment. Moreover, the practice under normal circumstances does not include labor management issues.

Another critical gap pertains to the lack of provisions requiring project-specific ESMP preparation. To manage project-related ES risks of FIs, DoE has no provision in existing policy ECA 1995 or ECR 2023 and subsequent amendments. The eminent domain land acquisition system for example does not require the preparation of Resettlement Action Plan (RAP). There are some gaps between the existing land acquisition law of the country and WB ESSs on Involuntary Resettlement and on indigenous peoples in terms of identification of affected persons and compensation packages and participation of community groups of diverse interests and vulnerabilities. The projects are also not required to formulate their own Labor Management Procedures/Plans (LMP). The LMP will primarily based on the Labor Act and Rules. Nevertheless, it would also refer to the relevant criminal laws and directives from the High Court Division of the Supreme Court.

Suggested gap-filling measures are given in Error! Reference source not found.. Given the gaps, this ESMF will follow the most stringent standards and requirement.

Table 9: Gap Analysis of GoB Laws and World Bank ESSs

WB ESF Standard	Equivalent National Environmental Policy and Regulation	Gap Analysis	Gap Minimization
ESS-1: Assessment and Management of Environmental and Social Impacts and Risks	The Environment Conservation Act, 1995 and subsequent amendments until 2010, ECR 2023 and subsequent amendments in 2002, 2003 and 2010	<p>The Bangladesh EIA System has a few material gaps with respect to the WB ESS1. Foremost among these are: (i) it does not cover many of the issues relating to other WB ESS; (ii) the stakeholder engagement during the EIA study is almost non-existent or very limited, needless to say, that there is no requirement to engage stakeholders during construction; (iii) it does not emphasize the application of mitigation hierarchy in selecting mitigation measures; (iv) it recognizes only IEE and EIA and does not provide for other assessment instruments, particularly SEA, REA and cumulative assessment; and, (v) it does not require analysis of alternatives. It has also a few problems of its own when compared to a standard EIA system, including: (i) it does not provide any formal definition of the projects to be required the Environmental Clearance--the law only refers to "industry" and "industrial units"; (ii) the screening process is inadequate--there is no procedure or criteria for determining which category a project would fall into; and (iii) it does not have formal procedure for compliance monitoring and reporting. Although there are suggestions in the EIA Guidelines on these issues, the Guidelines does not have the same compelling effect as the force of law or regulation.</p> <p>In terms of the other WB ESS, the gaps are generally benign with almost full conformance on labor and working conditions, pollution control and, on biodiversity conservation and sustainable management of living natural resources.</p>	ESMF has suggested following the ESS-1 requirements, given in the relevant sections of environmental management procedures. In case, DoE rules/ regulations do not cover the ESS requirements, and relevant clauses should be added in the financial agreements and project appraisal document to follow the more stringent safeguard requirements according to WB ESF.
ESS-2: Labor and Working Conditions	Bangladesh Labor Law, 2006, Bangladesh Labor Act, 2013 and Bangladesh Labor Rules, 2015	The Labor Act 2006 adequately addresses basic workers' rights, child labor, and women's needs, although it did not have explicit provisions about equal opportunity and non-discrimination, except for discrimination based on union memberships. The Labor Act's sections on occupational health and safety	Under this project, a central LMP has been prepared to regulate working conditions and management of worker relations including workers specific GRM, terms and conditions of employment, non-discriminations and equal opportunity, protection of work force, prohibition of

WB ESF Standard	Equivalent National Environmental Policy and Regulation	Gap Analysis	Gap Minimization
	Industrial Policy, 1999	regulations also did not mention provisions of appropriate protective equipment for workers.	child/forced labor, workplace harassment and provision of occupational health and safety (OHS).
ESS-3: Resource Efficiency and Pollution Prevention and Management	ECA 1995 Sustainable and Renewable Energy Development Authority Act 2012 Water Act 2013 Water Supply and Sanitation Act, 1996 The Ground Water Management ordinance, 1985 National Water Bodies Protection Act, 2000 National 3R Strategy for Waste Management, 2020 The National Water Act, 2013 Noise Pollution (Control) Rules 2006 Road Transport Act 2018 The Brick Burning Control Act, 1989 (Amendment Act, 1992 and 2001) Draft Air Pollution Control Rules 2021 Hazardous Waste (E-Waste) Management Rules, 2021:	The ECA 1995 and its implementing rules adequately provides for the control of environmental pollution. Energy efficiency is also being promoted at the user or individual project levels through the Energy Conservation Rules 2014. There is currently no regulation or program to encourage conservation of water at the individual companies/projects. Also, there is still no regulation or policy encouraging individual companies/projects to minimize GHG emission.	ESMP to be developed for BCAP component 1, 2, and 3 will address this issue and incorporate mitigation measures for efficient use of water resources.

WB ESF Standard	Equivalent National Environmental Policy and Regulation	Gap Analysis	Gap Minimization
	National Information and Communication Technology (ICT) Policy 2015		
ESS-4: Community Health and Safety	National Building Code 1993 National Building Code 1993 (RHD Geometric Design Standards 2005) Road Transport Act 2018 Bangladesh Standards and Testing Institute Act 2003 Food Safety Act 2013 (Various Laws) ECA 1995 Pesticide Act 2009 National Water Bodies Protection Act, 2000 Noise Pollution (Control) Rules, 2006 National Strategy for Waste Management Bangladesh National Building Code (BNBC), 2006	The more serious issues are observed in the community health and safety. The country has no policy or standards for dam safety or even for water infrastructure safety and there is still no comprehensive legislation on hazardous wastes and substances, although the ECA 1995 already empowers the DoE to determine safe procedures for the use, storage and transportation of hazardous substances. Expectedly, there is no clear requirements and agency responsible for ensuring community health and safety in development projects during planning, except those that have been traditionally covered in the EIA with DoE as the agency responsible. There is a serious lack of enforcement in almost every aspect of community health and safety, and this is probably worse in terms of the building code, in the regulations of food safety, and the operational aspect of road safety (i.e., traffic rules, licensing, etc.).	The gaps are addressed through suitable provisions in ESMP. In addition, contractors will be responsible to prepare and implement the Contractor Environmental and Social Management Plan (C-ESMP) regarding community health and safety which includes OHS plan, traffic and road safety management plan, SEA/SH Action Plan etc.
ESS-5: Land Acquisition, Land Use Restriction, and Involuntary Resettlement	The Acquisition and Requisition of Immovable Property Act, 2017 National Land Use Policy, 2001	<ul style="list-style-type: none"> • Does not require the preparation of RAP; • Does not provide compensation or assistance to those who do not have a formal legal claim to the land; Does not provide transitional allowances for restoration of livelihoods for informal settlers; relies on cash 	The project may require land acquisition from private entities. A RPF will be developed before negotiations to guide development of site-specific RAPs/A-RAPs to address the land related issue mentioned.

WB ESF Standard	Equivalent National Environmental Policy and Regulation	Gap Analysis	Gap Minimization
		<p>compensation, no developmental objectives;</p> <ul style="list-style-type: none"> no provision to give special attention to the vulnerable groups valuation of lost asset is not based on "replacement cost" standard 	
ESS-6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	ECA 1995 Disaster Management Act 2012 Biodiversity Act 2017 National Integrated Pest Management Policy 2002 Marine Fisheries Act 2021 Forest Act 1927 Protection and Conservation of Fish Act 1950 National Biodiversity Strategy and Action Plan (2004) Wildlife Conservation (Protection and Safety) Act, 2012 Bangladesh Biodiversity Act, 2017	<p>The biodiversity conservation regulations in Bangladesh focuses on identification of critical habitat areas and placing them under protected status. Given the protected status, development projects are generally not permitted in these areas, except when they are part of the protection plan for the area itself. Hence, there are no encompassing rules or guidelines in terms of managing projects' impacts and influence in these areas, such as the hierarchy rule in applying mitigation measures. However, the ECA 1995 does place liability to persons/companies for damages inflicted on ecosystem and provides that compensation for the damage will have to be determined by an expert.</p> <p>It should be noted that regulatory systems relevant to the other WB ES Standards are generally not formally linked with the EIA. This is because these laws are not intended to be applied in the planning stage of a project. They impose requirements to be met during operations of business establishments or facilities. Thus, the challenge for the implementation of ES Standards in development projects in Bangladesh is to bring these laws to bear with project planning and vetting.</p>	Not relevant for BCAP, as most of the activities will be undertaken in the existing premises.
ESS-7: Indigenous People	Constitutional Rights of the Tribal People	No equivalent requirements on: <ul style="list-style-type: none"> coverage of IP impacts in the ESIA; special treatment or differentiated approach to IPs and vulnerable groups; conduct of FPIC; development of IP Plan. 	A separate SECDPF has been prepared following the ESS7 requirements.
ESS-8: Cultural Heritage	-	No equivalent requirements on: <ul style="list-style-type: none"> the application of the hierarchy of measures; 	Not relevant for BCAP.

WB ESF Standard	Equivalent National Environmental Policy and Regulation	Gap Analysis	Gap Minimization
		<ul style="list-style-type: none"> the development of Cultural Heritage Management Plan; the development and adoption of project-specific Chance Find Procedures; and the engagement of cultural heritage experts. 	
ESS-9: Financial Intermediaries	-	Not applicable to the country system. Project proponents, regardless of funders, are subject to the same country's laws.	Not relevant for BCAP.
ESS-10: Stakeholder Engagement and Information Disclosure	Right to Information Act, 2009 Women and Children Repression Prevention Act, 2010 The Convention on the Elimination of all Forms of Discriminations Against Women Convention Bangladesh, 2015 Rights & Protection of Persons with Disabilities Act, 2013 National Women Policy, 2011	The ECA/ ECR does not specifically require consultation, but the ESIA guidelines issued by DoE and other agencies recommend public consultations during scoping and the preparation of the ESIA. There is also no provision for any stakeholder engagements during project implementation.	Under this Project, a combined SEP has been developed for all the PIUs to illustrate various stakeholders and ways to engage them and close the feedback loop. The SEP has detailed different GRM and grievance redress committees for the PIUs to address issues and concerns for the project.

Annex II: Environmental and Social Screening Form

Section A: Sub-Project Overview

Description of sub-project/component interventions:
Sub-project Location:
Expected construction period:
Description of project intervention area and project influence area with schematic diagram (where relevant, indicate distance to sensitive environmental areas and historical or cultural assets): Please also explain any analysis on alternative location was conducted

Section B: Environmental Screening

B.1: Environmental feature of sub-project location

Description of cultural properties (if applicable, including distance from site):
<p>Location of environmentally important and sensitive areas:</p> <p>(1) potential impacts on remaining forests in/around camps Yes/No</p> <p>(2) Other issues:</p> <p>*This question needs to be answered by checking the elephant migration route map established by UNHCR/IUCN</p>
Baseline air quality and noise levels:
<p>Baseline soil quality:</p> <p>Landslide potential (high/medium/low, with explanation):</p>
Baseline surface water and groundwater quality (FE, TDS, fecal coliform, pH):
Status of wildlife movement:
State of forestation:
<p>Summary of water balance analysis (For water supply scheme only):</p> <p>Please consider (i) water requirements of newly forested areas for plants' total evapotranspiration, (ii) new settlements water supply requirement for drinking water, household use, bathing and sanitation, (iii) replenishment rate from annual rainfall etc.</p>

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B.2: Pre construction Phase

Information on Ancillary Facilities (e.g. status of access road or any other facility required for sub-project to be viable):
Requirement of accommodation or service amenities (toilet, water supply, electricity) to support the work force during construction:
Possible location of labor camps:
Requirement and type of raw materials (e.g. sand, stone, wood, etc.):
Identification of access road for transportation (Yes/No):
Location identification for raw material storage:
Possible composition and quantities of wastes (Solids wastes, demolition materials, sludge from old latrines, etc.):

B.3: Construction Phase

Type and quantity of waste generated (e.g. Solids wastes, liquid wastes, etc.):
Type and quantity of raw materials used (wood, bricks, cement, water, etc.):
Approx. area (in square meters) of vegetation and soil in the right-of-way, borrow pits, waste dumps, and equipment yards:
Possibility of stagnant water bodies in borrow pits, quarries, etc., encouraging for mosquito breeding and other disease vectors: (High/Medium/Low with explanation)
Disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes): (High/Medium/Low with description)
Destruction or damage of terrestrial or aquatic ecosystems or endangered species directly or by induced development: (High/Medium/Low with description)
Activities that can lead to landslides, slumps, slip and other mass movements in roadcuts:
Erosion of lands below the roadbed receiving concentrated outflow carried by covered or open drains: (High/Medium/Low with description)
Describe possible traffic movement impacts on (unwanted) light, noise and air pollution:

High = Likely to cause long-term impacts or over large area (>1sqkm); Medium = Likely to cause temporary damage or over moderate area (0.5 to 1sqkm); Low = Likely to cause little, short-term damage and over small area (<0.5sqkm)

B.4: Operation Phase

Activities leading to health hazards and interference of plant growth adjacent to roads by dust raised and blown by vehicles:
Chance of long-term or semi-permanent destruction of soils: (High/Medium/Low with description)

Possibility of odor and water, soil quality impacts from SWM and FSM disposal system: (High/Medium/Low with description)
Possibility of stagnant waterbodies in borrow pits, quarries, etc., encouraging for mosquito breeding and other disease vectors: (High/Medium/Low with explanation)
Likely direct and indirect impacts on economic development in the project areas by the sub-project:
Extent of disturbance or modification of existing drainage channels(rivers, canals)or surface waterbodies(wetlands marshes): (High/Medium/Low with description)
Extent of destructionordamageofterrestrialoraquaticecosystemsorendangeredspeciesdirectly or by induced development: (High/Medium/Low with description)
Activities leading to landslides, slumps, slip sand other mass movements in roadcuts:
Erosion of lands below the road bed receiving concentrated outflow carried by covered or open drains: (High/Medium/Low with explanation)
Describe possible traffic movement impacts on (unwanted) light, noise and air pollution:

High = Likely to cause long-term impacts or over large area (>1sqkm); Medium = Likely to cause temporary damage or over moderate area (0.5 to 1sqkm); Low = Likely to cause little, short-term damage and over small area (<0.5sqkm)

Section C: Social Screening

C.1 General Labor Influx Screening

Key Screening questions	Aspects to Consider
Will the project potentially involve an influx of workers to the project location, and will the influx be considered significant for the local community?	How many foreign and local workers will be needed for the remaining period of the project, with what skill set? Can the project hire workers from the local workforce? What is the size and skill level of the existing local workforce? If the skill level of the local workforce does not match the needs of the project, can they be trained within a reasonable timeframe to meet project requirements? How will the workers be accommodated? Will they commute or reside on site or outside of the camp? If so, what size of camp will be required?
Is the project located in a rural or remote area?	What is the size of local population in the project area? What is the size of the host Rohingya community?

	<p>Is the project located / being carried out in an area that is not usually frequented by outsiders?</p> <p>What is the frequency and extent of contact between the local community and outsiders?</p> <p>Are there sensitive environmental conditions that need to be considered?</p>
<p>Based on the socioeconomic, cultural, religious and demographic qualities of the local community, Rohingya population and the incoming workers, is there a possibility that their presence or interaction with the local community could create adverse impacts?</p>	<p>Is it likely that the incoming workers and the local community come from a shared socio-economic, cultural, religious or demographic background?</p> <p>What is the level of existing resources, and will the incoming workers use or create competition for these resources?</p> <p>What is the expected duration of the incoming workers' presence in the community?</p> <p>Given the characteristics of the local community, are there any specific adverse impacts that may be anticipated?</p>
<p>Consultation with Community People</p>	<p>Has the project authority and contractors conducted any consultation meetings with the community people and Rohingya population?</p> <p>Are local people aware about the labors?</p> <p>Has the project authority involved the local community with the project?</p>

Involuntary restrictions on land use or on access to legally designated parks and protected areas				
10. Will people lose access to natural resources, communal facilities and services?				
11. If land use is changed, will it have an adverse impact on social and economic activities?				
12. Will access to land and resources owned communally or by the state be restricted?				
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project?	<input type="checkbox"/>	No	<input type="checkbox"/>	Yes
If yes, approximately how many?				
Are any of them poor, female-heads of households, or vulnerable to poverty risks?	<input type="checkbox"/>	No	<input type="checkbox"/>	Yes
Are any displaced persons from indigenous or ethnic minority groups?	<input type="checkbox"/>	No	<input type="checkbox"/>	Yes
During Screening, project authority will conduct consultation with the primary and secondary stakeholders and provide their observations in the following sections (13 to 18)				
13: Who are the stakeholders of the project?				
Answer:				

14: What social and cultural factors affect the ability of stakeholders to participate or benefit from the proposed policy or project?
Answer:
15: Are project objectives consistent with their needs, interests and capacity?
Answer:
16: What will be the impact of the project or sub-project on the various stakeholders, especially women and vulnerable groups?
Answer:
17: What social risks might affect project or sub-project success?
Answer:
18: Has the project authority or any other organizations conducted any consultations with the affected community or people? If yes. Please provide a summary.
Answer:

C.3. Social Capital Format

The objective is to list various types of social institutes/bodies working in the camp and intended project influence areas to enlist them for possible inclusion in the management and monitoring of the projects. List the name of social institutes/ bodies under the given categorization along with the following information. Use a separate sheet for each category of social institute/body. The information can be collected through secondary sources such as RRC/UN agencies or different development organizations involved with the Rohingya crisis projects.

Type of Social Institutes/bodies	Name of the Institution	Contact Person and Address and phone number	Primary areas of Work	Coverage areas in the camp and communities (list name of the places)
Government Organizations				
UN Agencies				
National Organizations				
Community Based Volunteer Organizations are those, which constitute the members of the community working towards				

social development.				
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Section D: Environmental and Social Screening Summary

Please summarize the results of environmental and social screening conducted above. Mitigation measures need to be proposed in referenced to ESMP Guidelines relevant to the type of the sub-project, proposed in Section 8.2 of ESMF. This table needs to be completed by both environmental and social specialists. Please add rows to the table as necessary.

Section	Main Environmental and Social Impacts	Impact Significance *	Suggested Mitigation Measures	Person/Institution Responsible	Monitoring Suggestions	
					Indicators	Frequency
1: Sub-Project Location						
2: Pre-construction Phase						
3: Construction Phase						
4: Operational Phase						

* Overall Impact Score: High = Likely to cause long-term E&S impacts; Medium = Likely to cause temporary impacts; Low = Likely to cause little, short-term impacts

Recommendation for further environmental and social assessment and/or site specific environmental and social management plan: Yes/No

**If yes, please specify what assessments/plans would be required.*

From completed by : (Name, designation, mobile number, signature, date) From checked by : (Name, designation, mobile number, signature, date)

Reviewed by : (Name, designation, mobile number, signature, date) Project Director Signature & Date:

Annex III Details of the ECoPs

ECoP-1: Waste Management

ECoP-1: Waste Management

Project Activity	Impacts	Mitigation Measures/ Management Guidelines
Waste generated from construction activity	<p>Soil contamination, water pollution and drainage congestion from the improper management of wastes and excess materials from the construction yards.</p> <p>Waste storage, and burn/burial at project sites may damage the topsoil.</p>	<p>The Contractor shall:</p> <ul style="list-style-type: none"> • Prepare a proper waste management plan for various specific waste streams (e.g., reusable waste, flammable waste, construction debris, food waste etc.) prior to commencing of construction and submit to BCAP PIU for approval. • Minimize the production of waste following 3R (Reduce, Recycle and Reuse) approach. Segregate and reuse or recycle all the wastes, wherever practical. • Provide dedicated covered waste collection bins at appropriate locations to ensure safe storage. • Remove collected wastes for dispose in approved waste disposal sites. • Prohibit burning of solid waste at construction site. • Use appropriate PPEs before handling wastes (gloves, mask, apron, safety boots). • Training on safe handling, collecting, storing and safe disposal'
Hazardous Waste	Pose health hazards and cause soil contamination due to improper waste management practice	<p>The Contractor shall:</p> <ul style="list-style-type: none"> • Provide sufficient numbers of containers (200 sealed containers) for collecting chemical wastes, appropriately labelled for safe transport to an approved chemical waste depot. • Store, transport and handle all chemicals avoiding potential spillage. • Ensure availability of Material Safety Data Sheets (MSDS) for all materials on-site during construction in local language. • Provide secondary container/construct concrete or other impermeable flooring to prevent seepage/spills of lube oil, machine oil and lubricants. Store at approved locations before safe transportation for off-site recycle, reuse or treatment via approved vendors. • Provide appropriate PPEs during handling wastes (gloves, mask, apron, safety boots).
Construction Wastes	Lack of or improper waste management practice may	<p>The contractor shall:</p> <ul style="list-style-type: none"> • Either re-use or dispose the waste generated

Project Activity	Impacts	Mitigation Measures/ Management Guidelines
	hazard for the workers, generates air and water pollution and other environmental impacts.	<p>during construction depending upon the nature of waste.</p> <ul style="list-style-type: none"> • Dispose of the wastes in designated place that could not be re-used safely. • Waste mapping and inventory should be conducted by the contractor and submitted to the PIU in every quarter. • The waste management practices adopted by the contractor shall be reviewed by the PIU during the progress of construction. • Arrange sufficient amounts of PPEs (gloves, mask, apron, safety boots) for workers during handling construction wastes. • Impart waste management (sorting, storing, segregation, transport and dispose off) related trainings to the construction workers.

ECoP-2: Water Resource Management

Project Activity	Impacts	Mitigation Measures/ Management Guidelines
Discharges from construction activities	Water resource- surface and groundwater quality may be deteriorated due to earth moving, removal of vegetation, waste disposal from construction work.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Install temporary drainage works (channels and bunds) in areas required for sediment and erosion control and around storage areas for construction materials. • Collect generated wastewater into the confined chambers/temporary sedimentation tanks. • Install temporary sediment basins, where appropriate, to capture sediment laden run-off from site. • Store stockpile materials and construction materials away from drainage lines. • Minimize of sediments, oil and grease, litter, debris and any other form of wastes. • Prevent all solid and liquid wastes entering waterways by collecting solid waste, oils, chemicals and wastewaters from brick and concrete cutting where possible and transport to an approved waste disposal site or recycling depot. • Wash out ready-mix concrete agitators and concrete handling equipment at washing facilities off site or into approved bounded areas on site. • Ensure that tires of construction vehicles are cleaned in the washing bay (constructed at the entrance of the construction site) to remove the mud from the wheels. This shall be done in every exit of each construction vehicle to ensure the

Project Activity	Impacts	Mitigation Measures/ Management Guidelines
		local roads are kept clean.
Hazardous Material and Waste	Water pollution from the storage, handling and disposal of hazardous materials and general construction waste and accidental spillage.	The Contractor shall <ul style="list-style-type: none"> Follow the wastes management guidelines proposed in ECoP-1. Minimize the generation of sediment, slurry, oil and grease, organic matter, litter, debris and any form of waste (particularly petroleum and chemical wastes).
Soil Erosion and siltation	Soil erosion and dust from the material stockpiles will increase the sediment and contaminant loading of surface water bodies.	The Contractor shall <ul style="list-style-type: none"> Ensure that roads used by construction vehicles are swept regularly to remove sediment. Spray water on material stockpiles, access roads and bare soils at required basis to minimize dust. Increase the watering frequency during periods of high risk (e.g. high winds, high temperature, etc.).

ECoP-3: Noise and Vibration

Project Activity	Impacts	Mitigation Measures/ Management Guidelines
Noise and vibration can be caused by machinery and vehicles movement	Noise and vibration may have an impact on people, property, fauna, livestock and the natural environment	The contractor shall: <ul style="list-style-type: none"> Maintain all vehicles in order to keep it in good working order in accordance with manufactures maintenance procedures. Ensure all drivers will comply with the traffic codes concerning maximum speed limit, driving hours, etc. Organize loading and unloading of trucks, and handling operations for the purpose of minimizing construction noise on the work site. Modify equipment to reduce noise (for example, noise control kits, lining of truck trays or pipelines). Install acoustic enclosures around generators to reduce noise levels. Fit high efficiency mufflers to appropriate construction equipment. Employ best available work practices on-site to minimize occupational noise levels. Provide trainings on noise limits, use of horns and sirens. Insert signage to aware on noise pollution. Ensure use of protective gears (ear mufflers/ ear plugs to protect from noise).

ECOP-4: Air Quality Management

Project Activity/	Impacts	Mitigation Measures/ Management Guidelines
Air or dust may generate due to improper management of construction vehicular traffic	Working area air quality can be adversely affected by the vehicle exhaust emissions and combustion of fuels.	<p>The contractor shall:</p> <ul style="list-style-type: none"> • Fit vehicles with appropriate exhaust systems and emission control devices. Maintain these devices in good working condition. • Procure safe and clean fuel to reduce air pollution from emissions. • Cover haul vehicles carrying dusty materials moving outside the construction site • Impose speed limits on all vehicle movement at the worksite to reduce dust emissions. • Control the movement of construction traffic. • Service all vehicles regularly to minimize emissions
Air and dust can be generated from construction machinery	Air quality can be adversely affected by dust generation from construction sites, material stockpiles and access roads is a nuisance in the environment and can be a health hazard	<p>The contractor shall:</p> <ul style="list-style-type: none"> • Increase watering frequency during periods of high risk (e.g. high winds). • Arrange spray water on bare soils, unpaved roads and stockpiles to prevent dust impacts on air quality. • Focus special attention on containing the emissions from generators. • Service all equipment regularly to minimize air or dust emissions. • Reschedule earthwork activities or vegetation clearing activities, where practical, if necessary to avoid during periods of high wind and if visible dust is blowing off-site. • Restore disturbed areas as soon as practicable by vegetation/grass-turfing. • Provide filtering systems, dust collectors or humidification or other techniques (as applicable) to the concrete batching and mixing plant to control the particle emissions in all its stages, including unloading, collection, aggregate handling, cement dumping, circulation of trucks and machinery inside the installations. • Execute wet-crushed or performed with particle emission control systems prior crushing of rocky and aggregate materials.

ECoP-5: Occupational Health and Safety

Project Activity/	Impacts	Mitigation Measures/ Management Guidelines
Best practices	Construction works may pose health and safety risks to the construction workers and site visitors leading to severe injuries and deaths. The population in the proximity of the construction site and the construction workers will be exposed to a number of (i) biophysical health risk factors, (e.g. noise, dust, chemicals, construction material, solid waste, wastewater, vector transmitted diseases etc.), (and (ii) road accidents from construction traffic.	<p>The contractor shall:</p> <ul style="list-style-type: none"> • Implement suitable safety standards for all workers and site visitors which should not be less than those laid down on the international standards (e.g. International Labor Office guideline on ‘Safety and Health in Construction; WBG’s ‘Environmental Health and Safety Guidelines’) and contractor’s own national standards or • statutory regulations, in addition to complying with the national standards of the Government of Bangladesh (e.g. ‘The Bangladesh Labor Code, 2006’) • Provide the workers with a safe and healthy work environment, taking into account inherent risks in its particular construction activity and specific classes of hazards in the work areas, • Provide personal protective equipment (PPE) for workers, such as safety boots, helmets, masks, gloves, protective clothing, goggles, full-face eye shields, and ear protection. • Maintain the PPE properly by cleaning dirty ones and replacing them with the damaged ones. • Safety procedures include provision of information, training and protective clothing to workers involved in hazardous operations and proper performance of their job. • Appoint an environment, health and safety manager to look after the health and safety of the workers.
Injuries due to major or minor accidents	Lack of first aid facilities and health care facilities in the immediate vicinity will aggravate the health conditions of the victims	<p>The contractor shall:</p> <ul style="list-style-type: none"> • Provide health care facilities and first aid facilities are readily available. Appropriately equipped first-aid stations should be easily accessible throughout the place of work. • Document and report occupational accidents, injuries, diseases, and incidents. • Prevent accidents, injury, and disease

Project Activity/	Impacts	Mitigation Measures/ Management Guidelines
		<p>arising from, associated with, or occurring in the course of work by minimizing, in a manner consistent with good international industry practice.</p> <ul style="list-style-type: none"> Identify potential hazards to workers, particularly those that may be life-threatening and provide necessary preventive and protective measures. Provide adequate lighting in the construction area and along the roads.
Water and sanitation facilities at the construction Sites	Lack of Water sanitation facilities at construction sites cause inconvenience to the construction workers and affect their personal hygiene.	<p>The contractor should</p> <ul style="list-style-type: none"> Provide portable toilets at the construction sites, if about 25 people are working the whole day for a month. Ensure the location of portable facilities at least 6m away from storm drain system and surface waters. These portable toilets should be cleaned once a day and all the sewerage should be pumped from the collection tank once a day and should be brought to the common septic tank for further treatment. Provide bottled drinking water facilities to the construction workers at all the construction sites.

ECoP-6: Road Transport and Road Traffic Management

Project activity	Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Increased traffic use of road by construction vehicles will affect the movement of normal road traffics and the safety of the road-users.	<p>The contractor shall:</p> <ul style="list-style-type: none"> Prepare and submit a traffic management plan to the PIU for approval at least 30 days before commencing work on any project component involved in traffic diversion and management. Provide signs at strategic locations of the roads complying with the schedules of signs contained in the Bangladesh Traffic Regulations. Install and maintain a display board at each important road intersection to be used during construction, which shall clearly show the following information in local language (Bangla): <ul style="list-style-type: none"> Location and types of construction of ongoing works Duration of construction period Period of proposed detour/alternative route Suggested detour route map

Project activity	Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> ○ Name and contact address/telephone number of the concerned personnel ○ Name and contact address/telephone number of the Contractor ○ Inconvenience is sincerely regretted.
	Accidental release or spillage of fuels and chemicals	<p>The contractor shall:</p> <ul style="list-style-type: none"> ● Restrict truck deliveries, where practicable to daytime working hours. ● Restrict the transport of oversize loads. ● Operate road traffics/transport vehicles, if possible, to non-peak periods to minimize traffic disruptions. ● Enforce on-site speed limit.

ECOP-7: Construction Camp Management

Project Activity/ Impact Source	Environmental and Social Impacts	Mitigation Measures/ Management Guidelines
Location of construction camps	Construction workers campsites are the potential sources of significant environmental and social impacts such as workers health hazards as well as hazards on local resources and infrastructure of nearby communities.	<p>The contractor shall:</p> <p>Select or locate construction camps such that permanent adverse environmental effects can be avoided or mitigated. Prior to locating and developing construction camps, the detailed layout plan of the construction camps, including locations of temporary buildings and other facilities like solid waste management areas, waste dumping areas, toilets, fuel storage areas and drainage systems, should be submitted to the DoE BEST Project PIU for approval.</p> <p>Select construction campsites such that mitigation measures stipulated in this ECOP can be implemented with reasonable facility.</p> <p>Consider the location of construction camps away from communities in order to avoid social conflict in using natural resources such as water or to avoid the possible adverse impacts of the construction camps on the surrounding communities.</p> <p>Be duly informed about health, religion and security from the local authority on the set up of camp facilities to maintain effective surveillance over public health, social and security matters.</p>
Construction camp facilities	Lack of or poor infrastructure facilities (housing, water, sanitation and waste management) will increase pressure on local services and cause health hazards to the	<p>The contractor shall:</p> <p>Provide adequate housing facilities for all workers. Provide adequate sanitary facilities and sewerage system. Toilet and domestic wastewater should be collected through common sewerage. Provide separate toilets and bathing places for males and</p>

Project Activity/ Impact Source	Environmental and Social Impacts	Mitigation Measures/ Management Guidelines
	workers	<p>females with total isolation by a wall or by location. Treatment facilities for sewerage of toilet and domestic wastes.</p> <p>Develop a stormwater drainage system to discharge all surface runoff from the campsite to a silt retention pond which shall be sized to provide a minimum of 20 minutes of retention for stormwater flow from the whole site that will be generated by a 20-year return period rainfall having a duration of at least 15 minutes. The run-off coefficient to be used in the calculation of the silt pond volume shall be 0.9. Silt ponds shall be maintained in an efficient condition for use throughout the construction period, with trapped silt and soil particles being regularly removed and transported and placed in waste material disposal areas as per ECoP1. Provide in-house community/common entertainment facilities. Dependence of local entertainment outlets by the construction camps to be discouraged/prohibited to the extent possible. Maintained all camps in a safe, clean and or appropriate condition throughout the construction period.</p>
Disposal of generated wastes	Improper waste management leads to environmental impacts	<p>The contractor shall:</p> <p>Ensure proper waste management to collect, segregate, store and disposal solid waste in the construction camps.</p> <p>Insist waste separation at sources into separate bins for organic and inorganic wastes at the construction camps.</p> <p>Dispose of organic wastes in a designated safe place on a daily basis. At the end of the day, cover the organic wastes with a thin layer of sand so that flies, mosquitoes, dogs, cats, rats are not attracted.</p> <p>Locate the garbage pit/waste disposal site min 500 m away from the residence so that people are not disturbed by the odor likely to be produced from anaerobic decomposition of wastes at the waste dumping places. Encompass the waste dumping place by fencing and tree plantation to prevent children from entering and playing with.</p> <p>Do not establish site-specific landfill sites. All solid waste will be collected and removed from the work camps and disposed of in approved waste disposal sites.</p>
Health and	Inadequate health and safety	The Contractor shall:

Project Activity/ Impact Source	Environmental and Social Impacts	Mitigation Measures/ Management Guidelines
Hygiene	practices pose potential diseases to be transmitted including malaria	<p>Provide adequate health care facilities within construction sites.</p> <p>Maintain communication with local hospitals/ clinics.</p> <p>Provide ambulance facility for the laborer during an emergency to be transported to nearest hospitals.</p> <p>Maintain emergency contact numbers of hospitals and doctors.</p> <p>Ensure first aid facilities at the camp round the clock.</p> <p>Maintain stock of medicines in the facility and appoint full-time designated first aider or nurse.</p> <p>Perform initial health screening of the laborer coming from outside areas.</p> <p>Train all construction workers in basic sanitation and health care issues and safety matters and on the specific hazards of their work.</p> <p>Carry out short training sessions on best hygiene practices to be mandatorily participated in by all workers.</p> <p>Place display boards at strategic locations within the camps containing messages on best hygienic practices.</p>
Safety	Inadequate safety facilities to the construction camps may create security problems and fire hazards	<p>The contractor shall:</p> <p>Provide appropriate security personnel (police/home guard or private security guards) and enclosures to prevent unauthorized entry into the camp area.</p> <p>Maintain register to keep track of a headcount of persons present in the camp at any given time.</p> <p>Encourage the use of flameproof material for the construction of labor housing/site office. Also, ensure that these houses/rooms are of sound construction and capable of withstanding windstorms/cyclones.</p> <p>Provide the appropriate type of firefighting equipment suitable for the construction camps.</p> <p>Conduct a fire drill at the construction camps with the help of local Fire Service and Civil Defense (FSCD) or trained fire safety personnel.</p> <p>Display emergency contact numbers clearly and prominently at strategic places in camps.</p> <p>Communicate the roles and responsibilities of laborer in case of emergency in the monthly meetings with contractors.</p>
Construction campsites restoration	Restoration of the construction camps to the original condition requires demolition of construction	<p>The contractor shall:</p> <p>Dismantle and remove from the site all facilities established within the construction camp, including the perimeter fence and lockable gates, at the</p>

Project Activity/ Impact Source	Environmental and Social Impacts	Mitigation Measures/ Management Guidelines
	camps	<p>completion of the construction work.</p> <p>Dismantle camps in phases and as the work gets decreased and not wait for the entire work to be completed.</p> <p>Give prior notice to the laborer before demolishing their camps/units.</p> <p>Maintain the noise levels within the national standards during demolition activities.</p> <p>Hire different contractors to demolish different structures to promote recycling or reuse of demolished material.</p> <p>Reuse the demolition debris to a maximum extent.</p> <p>Dispose of remaining debris at the designated waste disposal site.</p> <p>Handover the construction camps with all built facilities as it is if an agreement between both parties (contractor and landowner) has been made so.</p> <p>Restore the site to its condition prior to commencement of the works or to an agreed condition with the landowner.</p> <p>Not make false promises to the laborer for future employment in O&M of the project.</p>

ECoP-8- Water and Sanitation Facility for Labors

Project Activity/ Impact Source	Environmental and Social Impacts	Mitigation Measures/ Management Guidelines
Lack of WASH facility for laborer can cause inconvenience to the user and affect their personal hygiene	Spreading sewage water cause negative impacts on ground and surface water. Besides, sewage water may create vector borne diseases.	<p>The contractor shall:</p> <ul style="list-style-type: none"> ▪ Arrange a proper hygienic toilet facility. ▪ Manage toilet wastes properly. ▪ Ensure clean water and soap for toilets. ▪ Adequate lighting and ventilation for toilets. ▪ Separate toilet for male and female.
Drinking water	Groundwater at shallow depths is contaminated with arsenic and hence not suitable for drinking purposes.	<p>The contractor shall:</p> <ul style="list-style-type: none"> ▪ Ensure pumping of groundwater from deep aquifers (more than 300 m) to supply arsenic-free water. Safe and sustainable discharges are to be ascertained prior to the selection of pumps. ▪ Install tube wells with due regard for the surface environment, protection

		<p>of groundwater from surface contaminants, and protection of aquifer cross-contamination.</p> <ul style="list-style-type: none">▪ All tube wells, test holes, monitoring wells that are no longer in use or needed shall be properly decommissioned.
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Annex IV CERC Positive and Negative List

A. CERC Positive List

The positive list of works, services, non-consulting services and goods eligible for CERC component is shown in the list below. The works that will be financed under CERC will be those which do not trigger new ESS under the BCAP program.

Goods

- Medical equipment and supplies
- Non-perishable foods, bottled water and containers
- Tents for advanced medical posts, temporary housing, and classroom/day-care substitution

Equipment and supplies for temporary housing/living (gas stoves, utensils, tents, beds, sleeping bags, mattresses, blankets, hammocks, mosquito nets, kit of personal and family hygiene, etc.) and school

- Gasoline and diesel (for air, land and sea transport) and engine lubricants
- Spare parts, equipment and supplies for engines, transport, construction vehicles
- Lease of vehicles (Vans, trucks and SUVs)

Equipment, tools, materials and supplies for search and rescue (including light motor boats and engines for transport and rescue)

- Tools and construction supplies (roofing, cement, iron, stone, blocks, etc.)

Equipment and supplies for communications and broadcasting (radios, antennas, batteries, and cell phones)

- Water pumps and tanks for water storage

Equipment, materials and supplies for disinfection of drinking water and repair/rehabilitate of black water collection systems

- Construction materials, equipment and industrial machinery
- Water, air, and land transport equipment, including spare parts
- Temporary toilets
- Groundwater boreholes, cargos, equipment to allow access to affected site, storage units
- Any other item agreed on between the WB and the Burrowers (as documented in an Aide- Memoire or other appropriate formal Project document)

Services and non-consulting services

- Consulting services related to emergency response including, but not limited to urgent studies and surveys necessary to determine the impact of the disaster and to serve as a baseline for the recovery and reconstruction process, and support to the implementation of emergency response activities
- Feasibility study and technical design
- Works supervision
- Technical Assistance in developing ToRs, preparing Technical Specifications and drafting tendering documents (Bidding Documents, ITQ, RFP)
- Non-consultant services including, but not limited to: drilling, aerial photographs, satellite images, maps and other similar operations, information and awareness campaigns
- Non-consultant services to deliver any of the activities described in the “Goods” section of this table (e.g., debris removal, dump trucks, drones survey)
- Repair of damaged infrastructure including, but not limited to: water supply and sanitation systems, reservoirs, canals, roads, bridges and transportation systems, energy and power supply, telecommunication, and other infrastructure damaged by the event

- Re-establish of the urban and rural solid waste system, water supply and sanitation (including urban drainage)
- Repair of damaged public buildings, including schools, hospitals and administrative buildings
- Repair, restoration, rehabilitation of schools, clinics, hospitals
- Removal and disposal of debris associated with any eligible activity

Training

- Conduct necessary training related to emergency response including, but not limited to the implementation of EAP
- Training on rapid needs assessment and other related assessments

Emergency Operating Costs

- Incremental expenses should be borne by GoB source of funds for a defined period related to early recovery efforts arising as a result of the impact of an eligible emergency

B. CERC Negative List

In no case shall the activities for financing under the CERC exceed the ES standards presented in the BCAP PAD, ESMF and RPF. CERC activities will not trigger any new ESS. The following uses of BCAP resources by the CERC are prohibited:

- Activities that would lead to conversion or degradation of critical forest areas, critical natural habitats, and clearing of forests or forest ecosystems
- Activities affecting protected areas (or buffer zones thereof)
- Land reclamation (i.e., drainage of wetlands or filling of water bodies to create land)
- Land clearance and levelling in areas that are not affected by debris resulting from the eligible crisis or emergency
- River training (i.e., realignment, contraction or deepening of an existing river channel, or excavation of a new river channel)
- Activities that will result in the involuntary taking of land, relocation of households, loss of assets or access to assets that leads to loss of income sources or other means of livelihoods, and interference with households' use of land and livelihoods
- Construction of new roads, realignment of roads, or expansion of roads, or rehabilitation of roads that are currently located on communal lands but will be registered as government assets after rehabilitation
- Use of goods and equipment on lands abandoned due to social tension / conflict, or the ownership of the land is disputed or cannot be ascertained
- Use of goods and equipment to demolish or remove assets, Unless the ownership of the assets can be ascertained, owners consulted, assets valued, and losses compensated for in line with the program's RPF
- Uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor
- Uses of goods and equipment for activities that would affect indigenous peoples, unless due consultation and broad support has been documented and confirmed prior to the commencement of the activities as well as preparation of necessary mitigation and plans compliant with ESS7
- Uses of goods and equipment for military or paramilitary purposes
- Uses of goods and equipment in response to conflict, in any area with active military or armed group operations
- Activities related to returning refugees and internally displaced populations
- Activities which, when being carried out, would affect, or involve the use of, water of rivers or of other bodies of water (or their tributaries) which flow through or are bordered by countries other than the Borrower/Recipient, in such a manner as to in any way adversely change the quality or quantity of water flowing to or bordering said countries

Annex VIII: Sample ToR for Social Specialist

Major Responsibilities:

Reporting to the Project Director and performing the following roles and responsibilities:

- Lead the social activities related to the project according to the guidelines of the ESCP.
- Develop, organize, and deliver training and orientation for the stakeholders, which will include, but not be limited to, line ministry/Project staff, Partner Organizations, and relevant stakeholders.
- Conduct social screening and assessment of relevant subprojects to identify potential impacts in the project areas.
- Conduct detailed screening and share the screening report with the Bank.
- Prepare RAP if screening outcomes warrant.
- Carry out regular field visits to assess the quality and adequacy of screening and supervision of environmental-related activities.
- Prepare and submit regular social monitoring and implementation progress reports.
- Any other responsibility/activity as
- ked for by project management.

Qualifications:

The Specialist will possess the following qualifications.

- Minimum 10 years of experience with any reputed national/international organizations.
- Previous experience working on sector-related development projects.
- Demonstrated capacity in delivering training/orientation and report writing in English and Bengali.
- Master's degree in any subject of environmental science or other related subject.
- Previous experience in the environment with the World Bank/another donor-funded project.

Participated in a 14-week training course or any other short training program on the Environmental and Social Framework (ESF) (preferable).

Annex IX: Sample ToR for Social Specialist

Major Responsibilities:

- Reporting to the Project Director the Social Specialist will assume, among others, the following roles and responsibilities.
- Lead the social related activities of the project.
- Develop, organize and deliver trainings and orientation of social pertinent to the project with the stakeholders which will include, but not limited to; line ministry, Project staff, Partner Organizations, and relevant stakeholders.
- Carry out social screening and assessment of relevant sub-projects to identify the presence of project stakeholders in the project areas.
- Based on the data/information of the above screening/assessment, prepare site specific RPF for the project.
- Carry out regular field visit to assess the quality and adequacy of screening and also supervision of social related activities.
- Prepare and submit regular social monitoring and implementation progress reports.
- Any other responsibility/activity asked by the project management.

Qualifications:

The Social Specialist will possess the following qualifications.

- Minimum 8-10 years prior experience in the areas of social with any reputed national/international organizations.
- Previous experience of working in the health relevant project will be considered an advantage.
- Demonstrated capacity in delivering training/orientation and report writing both in English and Bengali.
- Master's degree in any subject of social science or any other relevant subject.
- Previous experience on social with World Bank/Bank/another donor funded project is highly desirable.

Annex X: Sample ToR for Communication Specialist

Scope of Work

The scope of these TORs is to ensure a systemic approach to stakeholder engagement by developing a Stakeholder Engagement Plan (SEP) for the project. The Specialist will prepare a SEP proportional to the scale and complexity of the project and its associated risks and impacts in close coordination with PIUs following a four-step approach:

- 1) **Stakeholder mapping and initial consultations:** identify key stakeholders, classified into project-affected and other interested parties; and hold initial consultations.
- 2) **Preparation of a preliminary SEP based on initial consultations:** Based on stakeholder feedback from the initial consultations, develop a draft SEP with detailed description of activities, roles and responsibilities, timeframe, and budget.
- 3) **Consultations on the preliminary SEP and feedback documentation** for key stakeholders and stakeholder groups;
- 4) **Preparation of the appraisal-stage SEP:** revise and further develop the draft SEP based on stakeholder feedback.
- 5) **Implementation and monitoring:** Monitor and lead in implementation of SEP.

The Stakeholder Engagement Plan will need to comply with the World Bank's ESS10 on Stakeholder Engagement and Information Disclosure and will include the following key elements:

- a) Introduction / Project Description
- b) Brief Summary of Previous Stakeholder Engagement Activities
- c) Stakeholder Identification and Analysis
- d) Stakeholder Engagement Program
- e) Grievance Redress Mechanism
- f) Gender-Based Violence (GBV) at the Project sites and Addressing Them
- g) Roles, Responsibilities, and Resources for Stakeholder Engagement (including budget)
- h) Monitoring and Reporting
- i) Annexes

Annexes of the SEP may include sample minutes from interviews and consultations conducted, a Grievance Submission Form, a Stakeholder Mapping or Diagram, and documentation from correspondence or minutes of other consultations conducted, e.g., workshops, roundtables, regional events, etc.

Specific Tasks for the Specialist

The Specialist will be required to undertake the following tasks:

- Stakeholder mapping and analysis and initial consultations: identify key stakeholders, classified into project affected and other interested parties, and support initial consultations.
- Initial stakeholder mapping and analysis based on desk review and initial consultations. The stakeholder identification should cover wider area than the project will affect if a location has not yet been identified.
- Identify key stakeholders and classify them into affected parties and other interested parties.
- Identify those project-affected parties (individuals or groups) who, because of their circumstances, may be disadvantaged or vulnerable, and due to their characteristics, may be more likely to be adversely

affected by the project impacts or more limited than others in their ability to take advantage of the project's benefits. Ensure that the stakeholder mapping is both gender- and age-sensitive. Further, the consultant should keep the four corporate gender pillars in mind (Improving Gaps in Human Endowments (Health/Education); Removing Constraints for More and Better Jobs; Removing Barriers to Women's Ownership and Control of Assets; Enhancing Women's Voice & Agency and Engaging Men and Boys) while engaging with particularly female stakeholders so that any issues with gender parity and women participation are addressed and GBV analysis can be made following the GPN.

Deliverables

The Project Preparation stage of this assignment is expected to be completed in about **12 weeks**.

- a) Prepare an inception report which includes information on stakeholders and groups that need to be consulted and engaged. – **2 weeks**
- b) Prepare and disclose a preliminary SEP ahead of the consultations. – **6 weeks**
- c) Prepare a revised version of SEP based on consultations, other stakeholder engagement, and PIU/World Bank feedback. – **2 weeks**
- d) Submit and disclose the appraisal-stage SEP. – **2 weeks**

Required Skills and Qualification

The Specialist must meet the following requirements:

- Master's degree in social sciences or a similar discipline.
- At least 5 years of experience in the field of social development, including extensive experience in stakeholder consultation, communication, mobilization, engagement, policy and advocacy work etc.
- Experience in conducting focus group discussions and participatory approaches of engagement such as PRA and in working with groups with low literacy levels.
- Sound knowledge of E&S requirements of international banks; knowledge of World Bank procedures will be a plus
- Ability to work independently and undertake the field assignments.
- Proven ability to work in a collaborative, team environment.
- Written and oral fluency in English required.
- Demonstrated computer user skills (e.g., desktop application MS Office such as Word, Excel, and Power Point).

Annex XI: Sample ToR for Gender Specialist

SCOPE OF WORK AND KEY ACTIVITIES

- **Review and assess existing project documents** including those regulating the work of the Contractor(s) (e.g. Operations Manual, environmental and social commitment plans - ESCP, environmental and social management frameworks/plans - ESMF/P, stakeholder commitment plans, labor management plans, codes of conduct, grievances redress mechanisms - GRM, bidding documents, etc.) and determine their effectiveness to address risks linked to sexual harassment and sexual exploitation and abuse, as well as the current measures being used to prevent and respond to any incidents. Meet with key staff in (locations) in order to review prevention and response processes, staff sensitization/training and effectiveness of existing GRM/ complaints mechanisms.
 - Assess quality, confidentiality and comprehensiveness of existing protocols being used if grievances related to SEA/SH are reported (linking survivors to services and avoiding re-victimization).
 - Assess quality, confidentiality and comprehensiveness of clear and confidential protocols for preventing SEA/SH.
- Make practical recommendations through the **development a work plan with concrete measures to implement key recommendations** to strengthen systems for SEA prevention and response in coordination with the Task Team), based on World Bank Good Practice Note for Addressing Gender Based Violence in Investment Project Financing Involving Major Civil Works and an assessment of the existing GBV risk management systems in place as part of the project implementation.
- **Organize/facilitate initial training of project related staff on GBV drivers**, risks and mitigation measures. Provide support for organizing trainings of PIU and project-related staff on SEA/SH risk mitigation, including codes of conduct and GRM.
- **Support the task team/contractor with the implementation of the GBV Action Plan (and any further mitigation measures)** in line with local labor legislation and a survivor-centred approach, including i) an awareness raising strategy, describing how workers and local communities will be sensitized to GBV risks, and the worker's responsibilities under the CoC; ii) a response protocol, including GBV service providers to which GBV survivors will be referred, and the services which will be available; iii) a GRM and allegation procedures, including how the project will provide information to employees and the community on how to report cases of GBV CoC breaches to the GRM and; iv) an Accountability framework to hold accountable alleged perpetrators associated to the project.
- **Assess the need and support implementation of community consultations with women to take place during upcoming implementation support missions**, in order to understand potential risks and the best ways to make project benefits accessible to women.
- **Support the development or adaptation of Codes of Conduct (CoC)** for workers (and GBV clauses in contracts promoting the inclusion of women and girls in the project, if applicable) based on best practice. Support the task team and contractors in rolling out the CoC, including training and documentation the process of implementation (challenges and lessons learned).
- **Develop or adapt a Standard Operating Procedures for a Gender Based Violence Grievance Redress Mechanism (GRM)** based on best practices in order to effectively collect information on instances of SEA/SH in coordination with the project task team and implementation unit. Support rolling out the GBV GRM, including training project related staff, labor, community members, hospital management, waste workers or others as needed, and document the process of implementation including challenges and lessons learned.
- **Support the development and costing of a survivor-centered protocol to respond to cases of GBV** reported through the GRM as part of the overall project framework. This should include adding to or creating GBV service providers mapping of priority project areas.

- Provide **recommendations and costing for the implementation of community awareness raising activities** that include the risk of SEA related to the project, the code of conduct for workers, the GRM and the ways in which the community members can safely report concerns.
- Provide **recommendations on integrating a gender lens** into any ongoing impact evaluations or project-related research (if relevant), and to gather lessons learned in cases where project activities are already finished and can no longer be retrofitted

Scope of work and methodology

- *Desk review and analysis of relevant documents:*
 - **Project documents prepared by** respective ministry, contractor and integrating gender and GBV implications where appropriate.
 - **Systems put in place by the relevant operations** - This will include Incident Reporting Procedures; Terms of Reference or existing Codes of Conduct for Contractors; instruments, including ESMF/P, stakeholder engagement plans, labor management plans, etc.; monitoring reports by contractors, GRM manual and reports as well as fact finding reports on most any previous allegations of SEA, etc. This could include examining processes for implementing and monitoring COCs, collecting and analyzing information on actual/potential risk factors for vulnerability to sexual exploitation and abuse and elaborating measures to address them.
 - **Best practices for accountability measures**, including CoCs, GRMs and SEA/SH risk mitigation and prevention measures relevant to the project.

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- *Key informant interviews:*
 - Semi-structured interviews with Government Counterparts/implementing agencies, NGO staff, relevant WB Program Leaders, Task Teams and Social specialists, other staff providing oversight in terms of SEA/SH prevention/response. The primary purpose of these interviews is to fully understand the set of measures put in place to address SEA in key sectors and the extent to which they meet global best practice requirements, as well as to understand the feasibility of initially proposed retrofitting recommendations.
 - Meet with the task team in order to review prevention and response processes, including staff training and monitoring, existence of complaints mechanisms, including community awareness raising re: making a complaint, and availability/provision of survivor-centered services for an alleged survivor.
 - Assess comprehensiveness of clear and confidential protocols to be followed if cases of SEA/SH are reported (linking survivors to services and avoiding re-victimization). If gaps are identified make recommendation to, i) strengthen the reporting response framework outlining procedures and guidelines targeting government partners and contracting firms associated with the project; ii) develop recommendations to strengthen the referral pathway for survivors that should be implemented as soon as a case is reported, verified or not.
 - Engage with counterparts directly involved in the project implementation regarding their intervention in any cases of SEA/SH, as well as to assess the extent of internal knowledge on this issue. The Specialist should meet in particular with the social and/or GRM focal points or the Operational Safety and Health team within the project to assess knowledge of appropriate and ethical measures to report and respond to cases of SEA/GBV. When meeting with those managing the GRM the Specialist should verify whether and how the grievance redress mechanism collects SEA/SH related complaints in a safe manner, without increasing risk to survivors and keeping anonymity if at all possible.
 - Engage with secondary sources of information on the potential risks of GBV linked to the project and on the appropriate entry points for the development of a GBV-sensitive GRM. This will include

women's organizations, GBV service providers active in the zone of implementation of the project, community leaders, and other community members with key information on the experiences of women and girls in communities affected by the project.

Rolling out appropriate systems

- Help Task Team set up GBV GRM, facilitate it running smoothly and monitor and record complaints received
- Help in rolling out appropriate CoCs, ensuring requirements in CoCs are clearly understood by those signing and signed by all workers present in project site.
- Clearly define the GBV requirements and expectations in the bidding documents for contractor
- Help Task team implement appropriate project related civil works for labor to reduce GBV risks. This can include separate, safe and easily accessible facilities for women and men working on the site like well-lit locker rooms and/or latrines located in separate areas, with the ability to be locked from the inside.
- Help in setting up IEC campaigns. Ensure that display signs are visible around the project site that signal to workers and the community that the project site is an area where GBV is prohibited.
- Monitoring all GBV related activities

The assignment will include office-based work and travel to project sites in Bangladesh as identified by and coordinated with the Task Team. Key activities during field work may include:

- Meeting with the project teams in order to review prevention and response processes linked to SEA/SH (staff training and monitoring, existence of complaints mechanisms, community awareness, and availability/provision of survivor-centered services for an alleged survivor);
- Consultations with communities surrounding the project.

Deliverables

The Specialist will prepare the following outputs:

1. Assessment report and work plan with measures to strengthen SEA/SH prevention and response mechanisms under project,
2. Carry out tasks set in Gender and GBV Action Plan, and further enhance/strengthen risk prevention and mitigation methods.
3. Rolling out appropriate systems as outlined.
4. Relevant trainings to sensitize community and project related staff about GBV issues, methods of reporting grievances.
5. Revised E&S instruments to integrate GBV risk mitigation measures in line with risks identified and good practices, in the country and in other WB funded projects.
6. Completed monitoring tool with up-to-date progress for each sub- project.

Reporting, Remuneration, Timing, and language of outputs

The initial duration of this assignment will be for XXX days until XXX. The work will be supervised by The PD. The outputs outlined above will be produced in English and in Bangla (when required).

Key skills, technical background and experience required.

- Minimum of 5 years relevant professional work experience at national and international levels in development or humanitarian field, with a focus on the prevention and response to gender-based violence.
- Operational experience on the ground in low- and/or middle-income countries in the implementation of programs related to violence against women and girls, sexual exploitation and abuse, gender, and child protection.
- Proven research skills and demonstrated expertise in analysis and development of technical papers and reports as well as programmatic guidance related to violence against women.
- Familiar and able to operationalize international standards, procedures for prevention and response to GBV, safe and ethical GBV data collection, and of key standards and resources on GBV in emergencies.
- Experience of collaborating with Government entities in GBV program implementation considered an asset.
- Direct experience in collecting, analyzing, and comparing data related to GBV.
- Knowledge and experience of World Bank policies and operations considered an asset.
- Excellent analytical, communication, writing, presentation/facilitation and editorial skills in English and Bangla.
- Willingness to travel regularly to engage with Task Teams on operational issues and advisory activities related to GBV.
- Commitment to a survivor-centered approach.

Annex X: World Bank GRM Checklist

Checklist to accompany the Guidance Note for ESS10: Stakeholder Engagement and Information Disclosure

This Checklist guides the Borrower in applying the Environmental and Social Standards (ESSs), which form part of the World Bank's 2016 Environmental and Social Framework. Checklists help to illustrate the ESSs' requirements and propose sample approaches to implement some of them; they are not Bank policy, nor are they mandatory. Checklists do not substitute for sound judgment in project decisions. In case of any inconsistency or conflict between the Checklists and the ESSs, the provisions of the ESSs prevail.

Grievance Redress Mechanism Checklist

The appropriate level of complexity of a project's Grievance Redress Mechanism (GRM) depends on the risks and impacts of the project and the project context. The following checklist describes a complex GRM that adheres to good international practice, which may not be necessary for all projects. Nevertheless, this checklist helps to determine whether a grievance mechanism conforms to good international practice.

A. System issues

1. Does the project invite feedback/grievances? Yes ___ No ___
2. Does the organization have a policy on grievance redress? Yes ___ No ___
- a) Is the policy available to all staff, beneficiaries, and potential users? Yes ___ No ___
- b) Is the policy written in the local language(s)? Yes ___ No ___
3. Does the grievance mechanism have the following features?
 - a) A clearly understood procedure for people to provide feedback and/or submit grievances. Yes ___ No ___
 - b) A statement of who is responsible for dealing with feedback/ grievances. Yes ___ No ___
 - 11 Procedures for resolving or mediating and investigating grievances. Yes ___ No ___

12 depending on their seriousness and complexity.

- c) A system for keeping complainants informed of status updates. Yes ___ No ___
- d) A system for recording feedback/grievances and outcomes. Yes ___ No ___
- e) Procedures for protecting confidentiality of complainants Yes ___ No ___

B. Staff management

- 1. Is there a grievance manual for staff? Yes ___ No ___
- 2. Do the grievance policy and/or procedures provide guidance on:
 - a) What is grievance/feedback? Yes ___ No ___
 - b) What information should be collected from complainants? Yes ___ No ___
 - c) What remedies can or should be used to resolve grievances? Yes ___ No ___
- 3. Are the grievance policy and procedures communicated to all staff? Yes ___ No ___
- 4. Are adequate resources allocated for the GM to function effectively? Yes ___ No ___
- 5. Does the organization provide training on grievance management to staff? Yes ___ No ___

C. Communication to grievance mechanism users

- 1. Are users told how to submit grievances/feedback? Yes ___ No ___
 - a) Is an information brochure on the grievance mechanism available to users? Yes ___ No ___
 - b) Are feedback/grievance forms available to users? Yes ___ No ___
 - c) Are grievance forms or signs displayed prominently and readily accessible? Yes ___ No ___
 - d) Are contact details of staff receiving feedback/grievance published? Yes ___ No ___
 - 13 and displayed in public areas?
 - e) Is information on grievance management available in local languages? Yes ___ No ___
- 2. Are users able to submit grievances/feedback:
 - a) In writing Yes ___ No ___
 - b) By email Yes ___ No ___
 - c) By fax Yes ___ No ___
 - d) By telephone Yes ___ No ___
 - e) In person Yes ___ No ___
- 3. Are users provided with assistance to submit feedback/grievances where needed? Yes ___ No ___
- 4. Can the grievance mechanism be accessed free of charge? Yes ___ No ___
- 5. Are users promised confidentiality? Yes ___ No ___
- 6. Are users informed about the appeals process? Yes ___ No ___

D. Feedback/grievance recording

- 1. Are all feedback/grievances recorded? Yes ___ No ___
 - a) Are grievances/feedback logged and documented? Yes ___ No ___
 - b) Are inquiries/suggestions and recommendations recorded? Yes ___ No ___
 - c) Are the outcomes and responses to all grievances/feedback recorded? Yes ___ No ___

E. Business standards

- 1. Are there business standards in place for the process and timing with which grievances/feedback are dealt with? Yes ___ No ___
 - a) Is receipt acknowledged within a stipulated time frame? Yes ___ No ___
 - b) Are the grievances supposed to be resolved within a stipulated time frame? Yes ___ No ___
- 2. Is there a quality control system in place to:
 - a) Check if all grievances have been dealt with or acted upon. Yes ___ No ___

- b) Check if all aspects of a grievance have been addressed. Yes___ No___
- c) Check if all necessary follow-up action has been taken. Yes___ No___

F. Analysis and feedback

1. Are regular internal reports on grievances/feedback produced for senior management? Yes___ No___
 - a) Grievances/feedback reports include data on: Numbers of grievances/feedback received. Yes___ No___
 - b) Compliance with business standards. Yes___ No___
 - c) Issues raised in grievances/feedback. Yes___ No___
 - d) Trends in grievances/feedback over time. Yes___ No___
 - e) The causes of grievances/feedback. Yes___ No___
 - f) Whether remedial action was warranted. Yes___ No___
 - g) What redress was actually provided? Yes___ No___
 - h) Recommendations/strategies to prevent or limit future recurrences. Yes___ No___
2. Are reports about grievances/feedback made public, periodically? Yes___ No___

Annex X: ToR for External Monitor/M&E Consultant

KEY OBJECTIVE OF EXTERNAL MONITORING

Monitoring is an integral part of the resettlement process. As part of this Project, a three-tier monitoring system has been designed to monitor and evaluate the progress of the Social Action Plan. These 3 levels comprise: a) Internal monitoring at the EA level involving the INGO, Contractor, and PIU offices; b) monitoring by project construction supervision consultant (CSC); and c) independent external monitoring.

The primary objective for engaging an independent external monitor is to review the efficacy of internal monitoring, design and conduct periodic third-party tracking and feedback, and GoB on policy improvement and enhancement of the implementation process. The External Monitoring Agency (EMA) will review implementation process as per set policies in the E&S documents and assess the achievement of resettlement objectives, the changes in living standards and livelihoods, restoration of the economic and social base of the affected people, the effectiveness, impact and sustainability of entitlements, the need for further mitigation measures if any, and to learn strategic lessons for future policy formulation and planning.

SCOPE OF WORK

The scope of work of the External Monitoring Agency (EMA) will include the following tasks:

- To develop specific monitoring indicators for undertaking monitoring of all aspects of ESIA and other Plans
- To review and verify the progress in plans implementation of the Project.
- Identify the strengths and weaknesses of the plan objectives and approaches, and implementation strategies.
- Analyze the affected people's pre- and post-project socio-economic conditions. In the absence of baseline socio-economic data on income and living standards and given the difficulty of APs' accurate recollection of their pre-project income and living standards, develop some quality checks on the information obtained from the APs. Such quality checks could include verification by neighbors and local village leaders. The methodology for assessment should be very explicit, noting any qualifications.
- To monitor and evaluate the implementation of ESMP along with other plans of the project
- Review results of internal monitoring and verify claims through sampling checks at the field level to assess whether outputs/ objectives have been generally met.
- To monitor and assess the adequacy and effectiveness of the consultative process with affected APs, particularly those vulnerable, including the adequacy and effectiveness of grievance procedures and legal redress available to the affected parties, and dissemination of information about these.
- Identify, quantify, and qualify the types of conflicts and grievances reported and resolved, as well as the consultation and participation procedures.
- Verify expenditure & adequacy of budget for resettlement activities.
- Describe any lessons learned that might be useful in developing the new national level E&S related policy and legal/institutional framework for involuntary resettlement.

METHODOLOGY AND APPROACH

The monitoring should be supplemented by focus group discussions (FGD), which would allow the monitors to consult a range of stakeholders (local government field staff, NGOs, community leaders, and, most importantly, APs), and community public meetings, which are open public meetings at the sites to elicit information about the performance of various resettlement activities.

TEAM COMPOSITION OF THE EXTERNAL MONITORING AGENCY

The EMA should focus on field-based research on the institutional arrangement, implementation strategy, policy objectives, and targets. In addition, data collection, processing, and analysis should be performed to pinpoint problem areas and weaknesses and to highlight corrective measures, if needed, to achieve the objectives on schedule.

Thus, there is a need for a dedicated monitoring team with adequate gender representation. Further, it is essential that the central team or field-level coordinators responsible for monitoring are skilled and trained in database management, interview techniques, and social and economic/finance. Keeping in mind these criteria, the team should ideally include:

Position/expertise	Qualification and experience
1. Team Leader/ Implementation Specialist/ Environmental Specialist	Masters in Environmental Science/Engineering with 15 years working background in planning, implementation and monitoring of E&S for infrastructure projects. Experience in institutional capacity analysis and implementation arrangement for preparation and implementation of ESIA/ ESMP, and knowledge in latest environment and social policies of the international development financing institutions in Bangladesh are preferred.
2. Social Impact Specialist	Masters in social science/science with 15 years working experience in social impact assessment including census and socioeconomic surveys, stakeholders' consultation, and analyzing social impacts to identify mitigation measures in compliance with social policies of the international development financing institutions and national legislations. Experience of preparing resettlement framework and action plans and implementation of plans for externally financed projects is essential.
3. Gender Specialist	Masters in social science with 15 years working experience in relevant field; Thorough knowledge of gender issues and their implications in development projects; research and work experience relating to gender issues; and knowledge of techniques and their applications in mobilizing community participation in development programs.
4. Data Analyst	Graduate with working experience and knowledge of software, those are most commonly used in Bangladesh; demonstrated ability to design and implement automated MIS(s) for monitoring progress, comparing targets with achieved progress and the procedural steps.

TIME FRAME AND REPORTING

The EMA will be employed over a period of 5 years, with intermittent input from the professional team continuing one year after the completion of the implementation period. Quarterly and annual monitoring reports should be submitted to the PSC, with copies to the World Bank. At the end of the Project, an evaluation report should be submitted to the PSC, with a critical analysis of the project's achievements and the performance of IAs and other related Consultants, etc.

QUALIFICATION OF THE EXTERNAL MONITORING AGENCY

The EMA will have at least 10 years of experience in resettlement/ES policy analysis and implementation of resettlement plans/EMPS. Further, work experience and familiarity with all aspects of ES operations would

be desirable. NGOs and consulting Firms (consultant organizations) with the requisite capacity and experience can qualify for the services of an external monitor for the Project.

- NGOs registered with the Social Welfare Department of the GOB and consulting firms registered with the Joint Stock Company.
- The applicant should have prior experience in social surveys in land-based infrastructure projects and preparation of ES-related documents according to international standards and the World Bank's guidelines.
- The applicant should have extensive experience implementing and monitoring different ES plans, preparing implementation tools, and developing and operating an automated monitoring system (MIS).
- The applicant should be able to produce evidence of monitoring using structured instruments and computerized MIS with set criteria for measuring achievement.
- The applicant should have adequate manpower, capacity, and expertise in the planning, implementation, and monitoring of involuntary resettlement projects, as per the donor's guidelines.

Interested agencies should submit a proposal for the work with a brief statement of the approach and methodology and relevant information concerning previous experience monitoring resettlement implementation and preparing reports. The profile of consultant agency, along with full CVs of the team to be engaged, must be submitted along with the proposal.

BUDGET AND LOGISTICS

The budget should include all expenses such as staff salary, office accommodation, training, computer / software, transport, field expenses and other logistics necessary for field activities, data collection, processing and analysis for monitoring and evaluation work. Additional expense claims whatsoever outside the proposed and negotiated budget will not be entertained. VAT, Income Tax and other charges admissible will be deducted at source as per GOB laws.

Appendix X: (Generic) ToR for Environmental and Social Management Plan

A. Scope of Work

The Consultant must prepare ESMP highlighting a set of mitigation, monitoring, and institutional measures to be taken during implementation and operation to eliminate adverse environmental and social impacts and bring them to acceptable levels. The plan will also include the actions needed to implement these measures. To prepare a management plan, the Consultant will identify (a) identify the set of responses to potentially adverse impacts, (b) determine requirements for ensuring that those responses are made effectively and in a timely manner, and (c) describe the means for meeting those requirements.

An ESMP should include the following components:

Description of Adverse Effects: The anticipated environmental and social effects are identified and summarized.

Description of Mitigation Measures: Each measure is described in terms of the effect(s) it is intended to address. As needed, detailed plans, designs, equipment descriptions, and operating procedures are described. Measures to enhance positive impacts should also be proposed.

Description of Monitoring Program: Monitoring provides information on the occurrence of environmental effects. It helps identify how well mitigation measures are working and where better mitigation may be needed. The monitoring program should identify what information will be collected, how, where, and how often. It should also indicate at what level of effect further mitigation will be needed.

Institutional Arrangement: The people, groups, or organizations that will carry out the mitigation and monitoring activities are defined, as well as to whom they report and are responsible. People may need to be trained to carry out these responsibilities and provided with equipment and supplies. A reporting procedure, including a grievance redress mechanism, should also be proposed.

Implementation Schedule: An implementation schedule specifies the timing, frequency, and duration of mitigation measures and monitoring and is linked to the overall subproject schedule.

Cost estimates and sources of funds: These are specified for the initial subproject investment and the mitigation and monitoring activities as a subproject is implemented. Funds to implement the ESMP may come from the subproject grant, from the community, or both. Government agencies and NGOs may be able to assist with monitoring.

The ESMP must be reviewed and cleared by the World Bank.

B. Deliverables and Proposed/Indicative Structure of ESMP Report

The proposed structure of the ESMP report is as follows:

Executive Summary: This should provide a general summary of the ESMP contents and key findings in a vocabulary easily understood by the general public. It should be clear and concise, ranging from 3 to 5 pages.

Introduction: An introduction describing the ESMP purpose, objectives, principles, and methodology. This

section should introduce the project proponents and the study team and provide other relevant information. The layout of ESMP should also be described to facilitate its use.

Sub-Project Description: This will include a description of the subproject, including its background, purpose, and different components. Also, indicate any subproject-specific resource requirements such as material, manpower, equipment, etc.

Environmental Baseline of Subproject Area: This section gives a site-specific overview of the baseline covering the physical and biological environment. It will include ambient air quality, noise, temperatures, rainfall, etc.

Socio-Economic Profile of Subproject Area: This section describes the socio-economic profile of the subproject area. It will cover community structure, planned development activities, population, occupation and livelihoods, methods of communication and transport, cultural heritage sites, etc.

Stakeholder Consultation and Information Disclosure: This section will describe the objective, process, and outcome of the stakeholder consultations conducted during the ESMP preparation. It should also list arrangements for disclosing subproject information to comply with the Bank's Policy of Disclosure of Information.

Impacts and Mitigation: This section will identify all positive and negative environmental and social impacts and provide cost-effective and feasible measures to reduce adverse environmental impacts to an acceptable level. It will describe mitigation measures in technical detail, including the type of impact to which they relate. It will also describe the methodology for social impacts.

Environmental Management and Monitoring Plan: This section will provide specific descriptions and technical details of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions. The monitoring and reporting procedures will ensure early detection of conditions that necessitate particular mitigation measures and furnish information on the progress and results of mitigation.

Institutional Arrangement: This section should present a detailed description of institutional arrangements, roles and responsibilities, and reporting procedures. It should also propose a capacity-building and training plan for the implementing agencies responsible for this project.

ESMP Implementation Budget: An ESMP implementation budget estimates are provided here. The budget will include funds for the institution's development activities, training programs for implementation teams and local/national institutions, technical assistance to authorities, costs for preparations of EMPs, and other E&S documents.

Annexures: Technical annexes to support ESMP implementation.

C. Qualifications and Skills Required

The Consultant needs to demonstrate that the proposed ESMP preparation team has the expertise required to fully appreciate the requirements of *all* the E&S Policies to be addressed in the ESMP, and to complete *all* required sections of the ESMP. The team should include appropriate number of specialists from different

disciplines including but not limited to environmental sciences, social sciences and GIS expert. The team should have complete understanding of the national legislative requirements as well as WB ESF policies.

Annex X: Conformance of the Bangladesh Labor Act with key elements of the ESS2

Key Elements of ESS2	Provisions in the Labour Act	Steps planned
Equal Opportunity and Non-discrimination	The law contains essential provisions prohibiting discrimination based on sex and disability, including equal wages for equal work.	No steps are required.
Timely payment	Wages must be paid before the expiry of the 7 th working day after the last day of the wage period.	No steps are required.
Working hours and overtime	48 hours per week, up to 60 hours with 12 hrs. overtime.	No steps are required.
Worker rights	Regular leaves and benefits. The employer must provide reasons for termination.	The LMP incorporated necessary provisions and actions.
Prevents the use of all forms of forced labor and child labor	A person below 14 years of age shall not be required or allowed to work in any factory. Fourteen years of age shall be permitted to work in a factory if s/he is a trainee or s/he has the certificate of fitness and government permission if the nature of employment is considered non-hazardous. Otherwise, all forms of child labor are banned.	No steps are required.
Protection of Workers		
OHS	The law provides comprehensive OHS and empowers DIFE to conduct inspections of establishments and impose penalties for violations or non-compliance.	No steps are required.
Children of the Working Age	Children (14 - 18) shall be assigned only light work and not be assigned to hazardous tasks.	No steps are required.
Women	8 weeks of paid maternity leave for expectant mothers is mandatory.	No steps are required.
Person with Disabilities (PWD)	Person with Disabilities (PWD) Rights and Protection Act 2013 provides rights to discrimination-free employment opportunities.	The LMP incorporated necessary provisions and actions.
Migrant Workers	No special provisions for migrant workers	No steps are required.
Contractor Workers	If a contractor does not pay the wages of a worker employed by a contractor, the establishment's employer must pay the wages.	No steps are required.
Community Workers	Labor law does not recognize community workers as defined in the ESS2 and hence does not provide any special considerations for such contracting arrangements. The law requires that all labor supply contracting agencies be formally registered, and workers should first be the responsibility of the contracting agency.	No steps are required.
Supplier/ Supply Workers	The law does not assign responsibility for the project to the supplier's laborers and their	The LMP incorporated necessary provisions and actions.

	working conditions. Workers of suppliers will have to be the responsibility of the suppliers.	
Freedom of association and collective bargaining	Employees can form a union with at least 20% participating, but the government does not permit unionization in the Export Processing Zones.	No steps are required.
Access to a grievance redress mechanism	<p>Employees can seek direct civil law redress from the Labour Courts for complaints regarding terms and conditions of employment and wages.</p> <p>While health and safety, maternity welfare, and child labor offenses are subject to criminal prosecution.</p> <p>Bangladesh has an institutional GRM for labor, as per the standards/provisions of the Bank's ESS2.</p>	The LMP incorporated necessary provisions and actions.

Annexure X: Outline of Contractor's LMP

Introduction	<ul style="list-style-type: none"> • Contract Package and authorization
Workforce Management	<ul style="list-style-type: none"> • Profile of workforce – work activities, schedule, contract duration, workforce rotation plan, workers' place of stay, workers with underlying health issues • Measures to mitigate risks on account of COVID 19 • Measures to prevent waterborne, airborne diseases and diseases spread by insects (dengue, malaria, etc.) • Contingency plan covering – pre-health check-up, access restrictions, hygiene, waste management, accommodation arrangements, PPE provision, and usage • Reporting and handling of incidents of accidents and COVID-19 cases, training and communication with workers, training, and SOPs on communicating and contact with community
Occupation Health & Safety and Emergency Management	<ul style="list-style-type: none"> • List of work locations, hazards/risks with PPE requirement and numbers • Lists of tasks and work zone critical for hazard prevention • Location of warning signage for hazard prevention • Requirement of first aid boxes and fire extinguishers – task and location wise • Provision of drinking water at worksite • Key person(s) to be contacted during emergency • Protocol for deciding the level of emergency – need for hospitalization, information to authorities, etc. • Process of accident analysis, corrective and preventive measures, and need for reporting
Addressing SEA/SH Risks	<ul style="list-style-type: none"> • Preventive measures – provision of lighting, separate toilet areas for men and women, increased vigil and security arrangement for community sensitive SEA/SH hotspots, if identified by dam authorities. • Sensitizing and awareness of labor on SEA/SH issues, including penalties and legal action against offenders • Awareness about the sensitivity of SEA/SH related complaints management • Notification requirements and method of reporting SEA/SH incidents
Workers Code of Conduct	<ul style="list-style-type: none"> • Preparation of Code of Conduct • Making labor aware of conduct with all the provisions, dos, don'ts, penalties for non-compliance, etc. • Displaying CoC at prominent locations • Signing of CoC by workers
Awareness and Training	<ul style="list-style-type: none"> • Plan for training and awareness covering pollution prevention, OHS, Rights of labor, use of PPEs, accident reporting and emergency management, CoC, SEA/SH, GRM, etc. • Training schedule • Training records
Workers Grievance Mechanism	<ul style="list-style-type: none"> • Details of GRM including contacts • Linkage with centralized GRS of the GoB • Process of receiving, redressing, escalation, reporting back • Consolidated statement on Grievances (segregated by non-COVID related & COVID related) • Contacts of nearest labor offices of the Department of Labor in the Ministry of Labor and Employment

Monitoring and Reporting	<ul style="list-style-type: none">• Scope, methodology, and outcomes of supervision and monitoring of LMP, attention issues
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**Annexure X: Suggested Due Diligence for
Social and Environmental Mitigation Measures in Labor Contracts**

Stage of Contractual Process	Due Diligence
Before bidding	<ul style="list-style-type: none"> • Ensure that the terms of reference clearly define the supervision engineer’s responsibilities regarding oversight and reporting. • Ensure the team's skills in terms of reference include key staff qualified and experienced in managing similar projects and with a demonstrated capacity to manage social and environmental issues, including community health and safety. • Ensure that the project GRM is established and its use is widely publicized.
Preparation of bidding documents	<ul style="list-style-type: none"> • Review contract conditions included in bidding documents to: <ul style="list-style-type: none"> (i) Ensure that the relevant mitigation measures in the ESMP are reflected and budgeted in the contract, (ii) Ensure the ESMP forms part of and is explicitly referred to in the bidding documents. (iii) Identify relevant provisions (workers, camps, child and forced labor, safety, grievance redress, etc.) regulating the contractor’s responsibility and identify any gaps, inconsistencies, or areas of concern that could be addressed through additional provisions in the “particular conditions of contract” and/or technical specifications (iv) Include a requirement that all workers sign ‘Codes of Conduct’ governing behavior and identify sanctions (v) Identify that external providers will undertake training projects on implementing the Codes of Conduct, etc. • Ensure the contract conditions specify what type of penalty the contractor will face if the provisions of the ESMP and CESMP are not adhered to, including by subcontractors. This may include direct incentives to contractors in penalties for poor performance on social and environmental matters or specific Performance Securities for ESMP and CESMP compliance. • Ensure that bidding documents clarify the contractor's responsibilities to prepare and adhere to a CESMP based on the ESMP and that no civil work commences until the supervision engineer has approved the CESMP. • Ensure the bidding documents detail how the contractor and supervision engineer will be required to monitor and report on the impacts on the local community, issues related to labor influx, and workers’ camps. • Propose Key Performance Indicators (KPIs) for Contract Management that reflect the issues and risks of the contract and monitoring plan.
Bidding evaluation	<ul style="list-style-type: none"> • Review the Borrower’s bid evaluation report and request to review the bids where appropriate to verify that documents related to the ESMP safeguard implementation capacity for the recommended bidder. Other contractor obligations required to

	<p>submit the bid are sufficiently detailed and cover the contractual requirements.</p> <ul style="list-style-type: none"> • Require the contractor’s representative or dedicated community liaison staff to be able to communicate in the Borrower’s and/or the local language. • Verify that the contract management framework identifies lines of communication, formalizes them, and provides a consistent record. • Ensure that the contractor meets the project’s OHS requirements for capability and experience.
After contract signing	<ul style="list-style-type: none"> • Before commencing works, the contractor submits site-specific CESMP(s) based on the ESMP, which includes specific management plans for (i) work activities, (ii) traffic management, (iii) occupational health and safety, (iv) environmental management; and (v) social management.

Annex X: (Sample) Code of Conduct (CoC)

Preamble

The IAS Code of Conduct defines labor standards to achieve decent and humane working conditions. The Code's standards are based on national law and accepted good labor practices.

Companies affiliated with the IAS are expected to comply with all relevant and applicable laws and regulations of the country where workers are employed and implement the Workplace Code in their applicable facilities. When differences or conflicts in standards arise, affiliated companies are expected to apply the highest standard.

The IAS monitors compliance with the Workplace Code by carefully examining adherence to the Compliance Benchmarks and the Monitoring Principles. The Compliance Benchmarks identify specific requirements for meeting each Code standard, while the Principles of Monitoring guide compliance assessment. The IAS expects affiliated companies to improve when Code standards are unmet and to develop sustainable mechanisms to ensure ongoing compliance.

The IAS provides a collaboration, accountability, and transparency model and catalyzes positive change in workplace conditions. As an organization that promotes continuous improvement, the IAS strives to be a global leader in establishing best practices for the respectful and ethical treatment of workers and promoting sustainable conditions through which workers earn fair wages in safe and healthy workplaces.

Employment Relationship

Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor and social security laws and regulations.

Non-discrimination

No person shall be subject to discrimination in employment, including hiring, compensation, advancement, discipline, termination, or retirement, based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, or ethnic origin.

Harassment or Abuse

Every employee shall be treated with respect and dignity. No employee shall be subject to physical, sexual, psychological, or verbal harassment or abuse.

Forced Labor

There shall be no use of forced labor, including bonded labor or other forms of forced labor.

Child Labor

No person shall be employed under the age of 14 or the age to complete compulsory education, whichever is higher.

Freedom of Association and Collective Bargaining

Employers shall recognize and respect employees' right to freedom of association and collective bargaining.

Health, Safety, and Environment

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in work or due to the operation of employers' facilities. Employers shall adopt responsible measures to mitigate the negative impacts that the workplace has on the environment.

Hours of Work

Employers shall not require workers to work more than the regular overtime hours the country's law allows. The regular work week shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest every seven days. All overtime work shall be consensual. Employers shall not request overtime regularly and compensate for all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

Compensation

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers' basic needs and provide some discretionary income, each employer shall work with the IAS to take appropriate actions to realize a level of compensation that does progressively.

Annex XX: Technical Guidelines for Consultation and Preparation of SEVCDP

The consultation framework is designed to help ensure that Indigenous peoples are well-informed, consulted, and mobilized to participate in the investments supported by the project. The primary features/process of the consultation framework include an environmental and social impact assessment to determine the degree and nature of impact supported by the project. A Small Ethnic Community Development Plan (SEVCDP) will be developed if small ethnic communities are found to be present in or have a collective attachment to areas affected under the respective project intervention. Consultations with and participation of small ethnic communities, their leaders, and local government officials will be an integral part of the overall SEVCDP, which should be prepared along with other required project reports.

A process involving small ethnic communities would provide comprehensive baseline data on social, economic, and technical aspects of each investment, particularly for areas identified with ethnic groups during the project screening (preparation). This also includes participatory mapping to determine the exact sites and communities and the location of small ethnic communities. The checklist for screening small ethnic communities with characteristics provided in the Bank ESS 7 will indicate whether the small ethnic communities exist in the project area and further identify potential social issues for small ethnic communities because of the investments. The IAs will undertake specific measures to consult with and allow small ethnic communities to participate in decision-making related to the investments, should they so desire.

All target communities that have a small ethnic mix and are candidates for project support will be visited (at the time of the first consultation with communities) by the PIU's team, including the social safeguard focal person and relevant local authorities, including personnel with appropriate social science training or experience. Before the visit, the PIU will send notice to the communities informing their leaders that they will be visited by the respective focal person and local authorities and that consultation will be conducted to seek the support of the project intervention and to determine potential adverse impacts as well as possible support from the project to address the potential impact. The notice will request that the communities invite the meeting representatives of fishers and other occupational groups, women's associations, and community leaders. The community leaders and other participants will present their views about the proposed activities during the visit.

The project will identify and utilize the existing community grievance mechanism to consider specific cultural attributes and traditional-cultural mechanisms for raising and resolving issues— to ensure that the concerns of different ethnic groups are received and addressed during project preparation, implementation, and beyond project completion. To achieve this, projects would (a) identify and determine culturally acceptable ways to address grievances from significantly different ethnic groups within affected communities, including different ethnic or cultural groups within the project-affected area; (b) understand cultural attributes, customs, and traditions that may influence or impede their ability to express their grievances, including differences in the roles and responsibilities of sub-groups (especially women) and cultural sensitivities and taboos; and (c) agree on the best way to access grievance mechanisms, taking into consideration the ways communities express and deal with grievances.

At this visit, the PIU's focal person or relevant official with social expertise will conduct a screening for Indigenous peoples with the help of Indigenous people leaders and local authorities.

The screening will check for the following:

- a) Names of ethnic groups in the target/affected villages/community.
- b) Total number of ethnic groups in the affected villages/community.

- c) Percentage of ethnic people in affected villages/communities; and
- d) Number and percentage of ethnic households within a described zone of influence of the proposed investments.

Once the IAs have selected target communities through a thorough screening process and the impact on small ethnic communities is potential, a social impact assessment will be conducted using an inventory of affected assets, impact on their occupations and income, baseline socioeconomic survey, and consultation. The social and economic profiles of the beneficiary population or project-affected people will be collected. Free, prior and informed consultations will be carried out for each of the beneficiary/affected communities/villages and the respective communities, ascertaining their broad support and determining the potential impacts and possible support under the Project.

SOCIAL ASSESSMENTS

In addition to the social assessment carried out at the project preparation stage, a social assessment will be undertaken among the selected target communities with potential resettlement and livelihood impacts. The SA will be conducted by qualified social development specialist knowledgeable about the culture of the concerned ethnic communities. At this stage, the social assessment will not only gather relevant information on demographic data; social, cultural and economic situation but also project impacts covering social and economic aspects, either positive or negative. The breadth, depth, and type of analysis required for the social assessment are proportional to the nature and scale of the proposed interventions under the project and their potential effects on the small ethnic communities. Outcomes of the assessment will be used to prepare SEVCDP.

The social assessment includes the following elements, as needed:

- a) A review, on a scale appropriate to the project, of the legal and institutional framework applicable to a small ethnic community.
- b) Gather baseline information on the demographic, social, cultural, and political characteristics of the affected Small ethnic community, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.
- c) Taking the review and baseline information into account, key project stakeholders are identified, and a culturally appropriate process for consulting with the Small ethnic community at each stage of project preparation and implementation is elaborated.
- d) The identification and evaluation, based on free, prior, and informed consultation with the affected small ethnic communities, of measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, and to ensure that the Small ethnic community receives culturally appropriate benefits under the project.

Consultations will be conducted through a series of meetings, including separate group meetings: ethnic village chiefs, ethnic men, and ethnic women, especially those who live in the zone of influence of the proposed work under the project. All consultations will be conducted in easily accessible locations. All will be carried out in relevant local languages. Discussions will focus on investment impacts, positive and negative, and recommendations for the design of investments. Broader community support will be required to proceed with the project intervention on a particular site with the presence of ethnic communities. Updated social assessment will also be carried out periodically during project implementation as part of the monitoring process to identify unexpected adverse impacts and to propose mitigation measures. If the effect is significant, SEVCDP will be updated based on the outcome of the revised social assessment. Likely, the free, prior, and informed consultation process will be continued.

SMALL ETHNIC COMMUNITY DEVELOPMENT PLAN (SEVCDP)

Based on the social assessment and in consultation with the affected small ethnic community, the IAs will prepare a Small Ethnic Community Development Plan (SEVCDP) that sets out the measures through which the Project will ensure that (a) small ethnic community affected by the project receive culturally appropriate social and economic benefits; and (b) when potential adverse effects on small ethnic community are identified, those adverse effects are avoided, minimized, mitigated, or compensated for. The SEVCDP is prepared flexibly and pragmatically, and its level of detail varies depending on the specific project and the nature of the effects to be addressed. IAs will integrate the SEVCD into the project design. When small ethnic communities are the sole or the overwhelming majority of direct project beneficiaries, the elements of SEVCDP should be included in the overall project design, and a separate SEVCDP is not required.

The SEVCDP includes the following elements, as needed:

- a) A summary of the information about (i) the legal and institutional framework applicable to small ethnic communities and (2) baseline information on the demographic, social, cultural, and political characteristics of the affected small ethnic communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.
- b) A summary of the social assessment.
- c) A summary of the results of the free, prior, and informed consultation with the affected small ethnic communities that were carried out during project preparation and that led to broad community support for the project.
- d) A framework for ensuring free, prior, and informed consultation with the small ethnic communities affected by the project during its implementation.
- e) An action plan of measures to ensure that the Indigenous Peoples receive culturally appropriate social and economic benefits, including, if necessary, measures to enhance the capacity of the project implementing agencies.
- f) When potential adverse effects on small ethnic communities are identified, an appropriate action plan of measures is developed to avoid, minimize, mitigate, or compensate for these adverse effects.
- g) The cost estimates and financing plan for the SEVCDP.
- h) Accessible procedures appropriate to the project to address grievances by the affected small ethnic communities arising from project implementation. When designing the grievance procedures, the availability of judicial recourse and customary dispute settlement mechanisms among the small ethnic communities will be considered.
- i) Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the SEVCDP. The monitoring and evaluation mechanisms should include arrangements for the free, prior, and informed consultation with the affected Indigenous Peoples' communities.

The following basic information will be required for the preparation of the SEVCDP:

- The essential census, socio-economic data, and inventory of affected assets.
- Household ownership of economic and productive assets.
- Annual income from primary and secondary employment opportunities.
- Economic information of community (e.g., brief information on economic and natural resources, production and livelihood systems, tenure systems).
- Social information of community (e.g., description of kinship, value system, types of social organizations of formal and informal groups).
- The potential impact of proposed project activities on essential social services.
- The potential impact of project activities on the social and economic livelihood.

Annex X: Preliminary Screening of Small, Ethnic and Vulnerable Communities

Date: -----

When to do the screening?	At the time of the first consultation with a community				
What information is to be collected?	Demographic data of small, ethnic and vulnerable community people who live within the catchment of the project interventions				
How to collect the information?	It can be obtained from ethnic leaders, village leaders (UP Chairman), and community chiefs.				
Who will do the screening?	Consultants or PIU staff				
District: _____ Upazila: _____ Union: _____ Village: _____					
Name of the village within the catchment of project interventions	Name of the ethnic group	Number of ethnic households	Total population of the village (nos.)	Number of the ethnic population (name)	
				Male	Female

Signature: -----

Name (of the PIU Consultant):