

Government of the People's Republic of Bangladesh

Department of Environment (DoE)

Ministry of Environment, Forest and Climate Change (MoEFCC)

Bangladesh Road Transport Authority (BRTA)

Ministry of Road Transport and Bridges (MoRTB)

Dhaka Transport Co-ordination Authority (DTCA)

Ministry of Road Transport and Bridges (MoRTB)

BANGLADESH CLEAN AIR PROJECT (BCAP)

(P502572)

Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

[Appraisal Version]¹

[March 2025]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

¹ The version that will be part of the negotiations package can be titled "For negotiations". Once the ESCP is agreed at negotiations, the reference should be changed to "Negotiated" and dated the day of the conclusion of negotiations. If the ESCP is updated during implementation, the reference should be changed to "Updated" and the date should be revised the day of finalization of the update. ESCPs should always be dated and properly labelled.

1. The People’s Republic of Bangladesh, the Recipient will implement the Bangladesh Clean Air Project (BCAP) (the Project), with the involvement of three Implementing Agencies (IAs): Department of Environment (DoE) under Ministry of Environment, Forest and Climate Change (MoEFCC); Bangladesh Road Transport Authority (BRTA) and Dhaka Transport Co-ordination Authority (DTCA) under Ministry of Road Transport and Bridges (MoRTB), as set out in the Original Financing Agreements (the Agreements). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the Agreements.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring, and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed, and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient’s Representative specified in the Agreements. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below, irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT²			
A	<p>ORGANIZATIONAL STRUCTURE</p> <ol style="list-style-type: none"> 1. Establish and maintain a Project Implementation Unit (PIU) at DoE, BRTA, and DTCA, each with qualified staff and resources to support the management of the project's environmental, social, health, and safety (E&S) risks and impacts. For DoE, this will include: one Environmental cum OHS Specialist; one Social cum Stakeholder Engagement Specialist and one Gender and SEA/SH Specialist. As regards BRTA, and DTCA, the respective PIUs will each hire: one Environmental cum OHS Specialist; one Resettlement and Social Development Specialist, and one Gender and SEA/SH Specialist. 2. Hire a Design and Supervision Consultancy Firm (DoE, BRTA & DTCA) within 6 (six) months of Effectiveness. Each firm will include 1 Environmental cum OHS Specialist (12 person/months), 1 Social Development Specialist, 2 Resettlement Specialists (only for BRTA and DTCA) and 1 Gender and GBV Specialist, and resources to support the management of the project's ESHS risks and impacts. 3. BRTA and DTCA will hire a resettlement implementation NGO (I-NGO) within nine (nine) months of project effectiveness to assist the respective PIUs with the site-specific resettlement action plan (RAP) and land acquisition proposal (LAP). 	<ol style="list-style-type: none"> 1. Within 3 months of Effectiveness, maintain the PIU and these positions throughout Project implementation. 2. Within 6 (six) months after Effectiveness. 3. Within 9 (nine) months after Effectiveness. 	<ol style="list-style-type: none"> 1. DoE, BRTA and DTCA 2. DoE, BRTA and DTCA 3. BRTA and DTCA 4.

² For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY-BUILDING PLAN/MEASURES</p> <p>1. All Project workers (including for construction works such as contractors) to receive training on:</p> <ul style="list-style-type: none"> • Occupation Health and Safety (OHS) • Community Health and Safety (CHS) • Prevention of Gender-based Violence/SEA/SH • Reporting on incidents and accidents and emergency preparation and response preparedness • Grievance Mechanism, especially for GBV/SEA/SH • Resource Efficiency and Pollution Prevention and Management • Waste Management <p>2. PIU staff to receive training on:</p> <ul style="list-style-type: none"> • ESF and implementation of Environmental and social instruments • Stakeholder engagement and Grievance Redress Mechanism (GRM) • Community Health and Safety and GBV/SEA/SH, including GRM for SEA/SH • Resettlement and Land acquisition • Labor Management and labor GRM • Resource Efficiency and Pollution Prevention and Management • Occupational Health and Safety (OHS) • Reporting on incidents and accidents and emergency preparation and response preparedness 	<p>1. The capacity-building measures will be ongoing throughout Project implementation, ensuring all workers are equipped with the necessary skills and knowledge, even when new workers are engaged.</p> <p>2. At the start of the project implementation and refreshers on a bi-annual basis</p>	<p>1. PIU of DoE, BRTA & DTCA</p> <p>2. PIUs with support from the Bank</p>
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health, and safety (E&S) performance of the Project, including but not limited to</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. 	<p>Submit quarterly progress reports to the Association throughout Project implementation, commencing six months after the Effective Date.</p> <p>The PIU of DoE, BRTA, and DTCA will submit the compiled progress report to the Association no later than 15 days after the end of each reporting period.</p>	DoE, BRTA & DTCA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> The number and status of the resolution of incidents and accidents reported under action E are below. 		
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Contractors and supervising firms must provide monthly monitoring reports on E&S performance using the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above.	PIU of DoE, BRTA & DTCA
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public, or workers, including those resulting in death or substantial injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide the Association with available details of the incident or accident upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying, and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide a review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice unless a different timeframe is agreed to in writing by the Association.</p>	PIU of DoE, BRTA & DTCA
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <ol style="list-style-type: none"> A draft Environmental and Social Management Framework (ESMF) has been prepared and disclosed prior to appraisal. Update the ESMF for the project, consistent with the relevant ESSs following the framework approach of the project's E&S assessment and management procedure. Prepare subcomponent-wise site-specific Environmental and Social Impact Assessments (ESIA), including Environmental and Social Management Plans (ESMPs) as applicable per the ESMF. Activities described in the exclusion list set out in the ESMF shall be ineligible for financing under the project. Incorporate the ESMP and required Bill of Quantities (BoQ) as part of the bidding documents for the respective activities/components that require the preparation of such an ESMP. Prepare a Project Operations Manual (POM) that includes the overall management of the project's E&S risks, including the E&S implementation of the CERC component. 	<ol style="list-style-type: none"> The draft ESMF must be updated within 60 days from the date of effectiveness. Thereafter, the ESMF will be implemented throughout the project. Upon screening and confirmation of project sites, implement the respective ESIA/ESMP throughout Project implementation. 90 days from the date of effectiveness. 	PIU of DoE, BRTA & DTCA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including inter alia the relevant E&S assessments or plans, such as the Labor Management Procedures (LMP) and the Code of Conduct (CoC), into the E&S specifications of the procurement documents and contracts with contractors and supervising firms.</p> <p>Thereafter, ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant agreements with contractors/subcontractors and supervision firms to the Association.</p>	<p>During the preparation of bid documents and throughout Project implementation.</p> <p>Supervise contractors throughout Project implementation.</p>	PIU of DoE, BRTA & DTCA
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project by terms of reference acceptable to the Association and consistent with the ESSs. Thereafter, prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	PIU of DoE, BRTA & DTCA
1.4	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>1. Ensure that the Project Operations Manual (POM), as specified in the legal agreement, includes a description of the E&S assessment and management arrangements of the CERC component concerning the project ESMF for the implementation of [name of CERC component, e.g., CERC Part] by the ESSs.</p> <p>2. Implement the E&S provisions of the POM, including, if applicable, the CERC-ESMF/ESMF Addendum and any assessments and plans required therein.</p> <p>.</p>	<p>1. The preparation of the POM in form and substance acceptable to the Association is a withdrawal condition of the Financing Agreement.</p> <p>2. The POM will be prepared and finalized to the Association's satisfaction within 90 days of the project's effectiveness.</p>	PIU of DoE, BRTA & DTCA
1.5	<p>ASSOCIATED FACILITIES</p> <p>Not applicable.</p>		
1.6	<p>USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK</p> <p>Partially applicable with gap filling measures as identified in E&S documents (ESMF, LMP, RPF, SEP and SEA/SH Plan)</p>	Throughout project implementation	PIU of DoE, BRTA & DTCA
1.7	<p>COMMON APPROACH</p> <p>Not Applicable.</p>		
1.8	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>Not Applicable.</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Prepare and implement the Labor Management Procedures (LMP) for the Project with provisions on working conditions, management of worker relationships, occupational health and safety (including personal protective equipment and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	Prepare the LMP within 60 days of effectiveness and thereafter implement it throughout the Project's implementation.	PIU of DoE, BRTA & DTCA
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Prepare and implement an Occupational Health and Safety (OHS) Management Plan to assess and manage the project's OHS risks and impacts.	Before the commencement of any construction /physical works, implement throughout Project implementation.	PIU of DoE, BRTA & DTCA
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish a GM before engaging Project workers and maintain and operate it throughout Project implementation.	PIU of DoE, BRTA & DTCA
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare the WMP before the commencement of any construction activities and implement the WMP throughout Project implementation.	PIU of DoE, BRTA & DTCA
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Resource efficiency, pollution prevention, and management measures should be incorporated in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMPs.	PIU of DoE, BRTA & DTCA
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMPs.	DoE, BRTA & DTCA
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities and include mitigation measures in the ESMPs to be prepared by the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs.	DoE, BRTA & DTCA
4.3	SEA AND SH RISKS Prepare and implement a SEA/SH Action Plan (to be incorporated subsequently into the POM) to assess and manage the risks of SEA and SH.	Before the Project Effectiveness, and thereafter to be implemented throughout the Project.	DoE, BRTA & DTCA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the project's security risks, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities as set out in the ESMP or Security Management Plan.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	DoE, BRTA & DTCA
4.5	<p>DAM SAFETY (FOR ANNEX A ESS4)</p> <p>Not applicable</p>		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE, AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT FRAMEWORK</p> <p>Prepare, disclose, and implement the Resettlement Policy Framework (RPF), consistent with ESS5.</p> <p>Prepare and implement a Resettlement Action Plan (RAP), including a Livelihood Restoration Plan (LRP) as set out in the RPF and consistent with ESS5.</p>	<p>Prepare the RFP within 60 days of Project Effectiveness and implement the RPF throughout Project implementation.</p> <p>Prepare and implement the respective RAP or LRP prior to carrying out the relevant civil works, including ensuring that full compensation and moving allowances have been provided before taking possession of the land and related assets.</p>	DoE, BRTA & DTCA
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>The ESS6 is irrelevant due to the project's location in areas of minimal biodiversity significance, where the potential impact on natural resources remains negligible. Additionally, the nature and scale of activities typically result in minimal disruption to local ecosystems and biodiversity. Therefore, the specific requirements and standards outlined in ESS6 are unnecessary to address or implement in this context. However, should any biodiversity-sensitive or protected areas be identified during the project implementation stage, ESS6 would then become relevant.</p>	If risks on sites of biodiversity value are identified during screening, measures must be taken as per the mitigation hierarchy before any civil activities begin.	DoE, BRTA & DTCA
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>INDIGENOUS PEOPLES PLAN</p> <p>1. Prepare and implement a Small Ethnic Communities Development Framework (SECDF) for the Project, consistent with ESS7. The SECDF will be integrated into the project ESMF with the related section(s) laying down the principles and approaches consistent with ESS7.</p> <p>2. Prepare and implement a Small Ethnic and Vulnerable Communities Development Plan (SECDP) based on the SECDF for each activity under the Project for which screening shows SECDF is required, consistent with ESS7.</p>	<p>Prepare and disclose the SECDF as part of the project ESMF within two months of project effectiveness and implement it throughout the project duration.</p> <p>Prepare the SECDP before carrying out any activity that requires the preparation of such SECDF. Once finalized, implement the respective</p>	DoE, BRTA & DTCA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		SEVCDP throughout the project's implementation.	
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Not relevant.		
8.2	CHANCE FINDS Describe and implement the chance finds procedures as part of the ESMF and ESMP of the Project.	Same timeframe as for the preparation and implementation of the ESMF/ESMPs.	
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) Not applicable.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Prepare and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. It will be updated and redisclosed, as needed, periodically to address recent and upcoming issues, necessitating stakeholder consultation and closing the feedback loop.	Prepare and disclose before appraisal, and thereafter, to implement throughout the project.	DoE, BRTA & DTCA
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism to receive and facilitate the resolution of concerns and grievances related to the Project promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Establish the grievance mechanism at the project's effectiveness and thereafter maintain and operate the mechanism throughout project implementation. Until the GRM is effective, the IA's own GRM will receive and address the grievances following the described process. SEA/SH compliant GRM will be set up within 3 (three) months of project effectiveness.	DoE, BRTA & DTCA

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>INDICATORS FOR IMPLEMENTATION READINESS [This subsection lists the ESCP actions (by their numbering in the first column of the ESCP) identified as relevant to monitor project readiness from an E&S standpoint. These may include actions related to: i) establishment of E&S risk management units in the Project Implementation Entities, ii) recruitment and training of E&S staff within Project Implementation Entities, iii) Memorandums of Understanding or other written agreements/arrangements between Project Implementation Entities and other concerned agencies to ensure proper coordination of E&S risk management activities; iv) E&S effectiveness or disbursement conditions, if deemed warranted, v) ES assessments and plans to be prepared by the Borrower at the onset of implementation; vi) other project-specific requirements related to E&S readiness for implementation].</p>		
<p>The following actions are indicators of implementation readiness:</p> <ul style="list-style-type: none"> • Project E&S documents, SEP, ESCP and draft ESMF, are prepared and disclosed. 		