

Government of the People's Republic of Bangladesh

Local Government Engineering Department

Local Government Division

Ministry of Local Government, Rural Development and Cooperatives

Bangladesh Water Development Board

Ministry of Water Resources

Social Development Foundation

an autonomous organization under the Financial Institutions Division, Ministry of Finance

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Appraisal Version

08 December 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

[The paragraphs below contain general undertakings about the ESCP that are standard and should be used verbatim across all projects. Any adjustment should be minor and drafted in consultation with the country lawyer.]

1. The People’s Republic of Bangladesh (the Recipient) will implement the Bangladesh Sustainable Recovery, Emergency Preparedness and Response Project (B-STRONG) (the Project), with the involvement of three Implementing Agencies (IAs): Local Government Engineering Department (LGED) under the Local Government Division (LGD) of the Ministry of Local Government, Rural Development and Cooperatives (MoLGRD&C); Bangladesh Water Development Board (BWDB) under Ministry of Water Resources (MoWR); and Social Development Foundation (SDF) an autonomous organization under the Financial Institutions Division (FID) of the Ministry of Finance (MoF), 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 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 SUPPORT¹			
A	<p>ORGANIZATIONAL STRUCTURE</p> <ol style="list-style-type: none"> 1. Establish and maintain a Project Implementation Unit (PIU) at LGED, BWDB and SDF, each with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project. LGED and BWDB PIUs will each hire 1 Environmental Specialist, 1 Social Specialist, and 1 Gender and GBV Specialist. The SDF PIU will hire 1 Environmental and Social Specialist, 1 Gender and GBV Specialist, and 1 Community Mobilization Specialist. 2. Hire a Supervision Firm (LGED) and a Design and Supervision Consultancy Firm (BWDB), within 9 months of Effectiveness. Each of these firms will include 1 Environmental Specialist, 1 Social Specialist and 1 Gender and GBV Specialist and resources to support management of ESHS risks and impacts of the Project. 3. Hire a Monitoring and Evaluation Firm (LGED) with qualified staff and resources to monitor the ESHS risks and impacts of the project, including an environmental specialist, a social specialist, and a gender and GBV specialist.to cover both LGED and BWDB activities. 	<ol style="list-style-type: none"> 1. Within 6 months of Effectiveness and thereafter maintain the PIU and these positions throughout Project implementation. 2. Within 9 months after Effectiveness. 3. Within 9 months after Effectiveness. 	<ol style="list-style-type: none"> 1. LGED, BWDB and SDF 2.LGED and BWDB 3.LGED

¹ 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 and community workers) 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 • stakeholder mapping and engagement • Grievance Mechanism especially for GBV/SEA/SH • Resource Efficiency and Pollution Prevention and Management • Waste Management <p>2. Labor Management Both PIUs Directors and 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), including GRM for SEA/SH • GBV/SEA/SH • Resettlement and Land acquisition • Labor Management • Resource Efficiency and Pollution Prevention and Management 	<p>1. Throughout Project implementation, including when new workers are engaged.</p> <p>2. At the start of the project implementation and refreshers on bi-annual basis</p>	<p>LGED, BWDB and SDF</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 as 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. • Number and status of resolution of incidents and accidents reported under action E below. 	<p>Submit quarterly progress reports to the Association throughout Project implementation, commencing six months after the Effective Date. PIU of LGED will submit the compiled progress report to the Association no later than 15 days after the end of each reporting period.</p>	<p>LGED, BWDB and SDF</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with 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.	LGED, BWDB and SDF
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 significant 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 available details of the incident or accident to the Association 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 be taken 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 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>	LGED, BWDB and SDF
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"> 1. Conduct a third-party Environment and Social audit of all activities eligible for retroactive financing. PIUs to maintain all necessary documentation and record of such activities in compliance with ESF requirements. 2. Adopt and implement an Environmental and Social Management Framework (ESMF) for the project, consistent with the relevant ESSs 3. Prepare subcomponent-wise site specific 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 to receive 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 ESMP. 4. Adopt and implement Labor Management Procedures (LMP), SEA/SH Mitigation Action Plan, 5. Adopt and implement a Resettlement Policy Framework (RPF). 6. Adopt and implement a Small Ethnic Communities Planning Framework (SECPF). Site- 	<ol style="list-style-type: none"> 1. Within 60 days of Effectiveness 2. Within 60 days of Effectiveness and thereafter implement the ESMF throughout Project implementation. 3. Upon screening and confirmation of project sites, implement the respective ESMP throughout Project implementation. 4. Within 60 days of Effectiveness and before the hiring of any project workers 	<ol style="list-style-type: none"> 1. SDF 2. LGED, BWDB, SDF 3. LGED, BWDB, SDF 4. LGED, BWDB, SDF 5. LGED, BWDB 6. LGED, BWDB, SDF 7. LGED, BWDB,

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>specific Plans to be developed where relevant after screening.</p> <p>7. Adopt and implement Resettlement Action Plans, as relevant based on site-specific screening and RPF. – to be disclosed and implemented.</p>	<p>5. Within 60 days and before the commencement of any civil works.</p> <p>6. Within 60 days of Effectiveness, and before commencement of any project activities.</p> <p>7. Before commencement of the relevant project activities</p>	
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, the Labor Management Procedures (LMP), and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. 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 contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>During preparation of bid documents and throughout Project implementation.</p> <p>Supervise contractors throughout Project implementation.</p>	LGED, BWDB and SDF
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 in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	LGED, BWDB and SDF
1.4	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements for the implementation of the CERC component, in accordance with the ESSs.</p> <p>Adopt any environmental and social (ES) instruments which may be required for activities under the CERC component of the Project, in accordance with the CERC Manual and, if applicable, CERC-ESMF and the ESSs, and thereafter implement the measures and actions required under said ES instruments, within the timeframes specified in said ES instruments.</p>	<p>The adoption of the CERC Manual in form and substance acceptable to the Association is a withdrawal condition under section III.B1(b) of Schedule 2 of the legal agreement for the Project. Adopt any required ES instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the ES instrument is required. Implement the ES instruments in</p>	LGED, BWDB and SDF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		accordance with their terms, throughout Project implementation.	
1.5	ASSOCIATED FACILITIES Not applicable.		
1.6	USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK Not Applicable.		
1.7	COMMON APPROACH Not Applicable.		
1.8	ACTIVITIES SUBJECT TO RETROACTIVE FINANCING 1. Environmental and social risks will be screened, and appropriate mitigation measures applied, following ESF protocols, before implementation of any activities that are to be retroactively financed. 2. Environmental and Social Audit to be conducted by third party prior to disbursement for activities subject to retroactive financing.	1. Before implementation of any activities that are to be retroactively financed. 2. Before disbursement of retroactive financing.	SDF
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers 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.	Within 60 days of Effectiveness and before the commencement of any civil or community-based works, and thereafter implement throughout Project implementation.	LGED, BWDB and SDF
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Adopt and implement an Occupational Health and Safety (OHS) Management Plan to assess and manage the OHS risks and impacts of the Project.	Prior to commencement of any construction /physical works, and thereafter implement throughout Project implementation.	LGED, BWDB and SDF
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. The existing grievance mechanism for project workers should be adopted until LMP is prepared. Grievance mechanism will be responsive to SEA/SH complaints.	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	LGED, BWDB and SDF
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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 prior to the commencement of any construction activities and thereafter implement the WMP throughout Project implementation.	LGED, BWDB and SDF
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	LGED, BWDB and SDF
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 ESMP.	LGED, BWDB and SDF
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, wastes, noise, air, and wastes water emission, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs.	LGED, BWDB and SDF
4.3	SEA AND SH RISKS Prepare and implement a SEA/SH Mitigation Action Plan, (to be incorporated in the LMP and ESMP as well), to assess and manage the risks of SEA and SH.	Within 60 days after Effectiveness, and thereafter implement throughout Project implementation.	LGED, BWDB and SDF
4.4	SECURITY MANAGEMENT Not applicable.		
4.5	DAM SAFETY (FOR ANNEX A ESS4) Not applicable		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT FRAMEWORK Adopt and implement a Resettlement Policy Framework (RPF) and Resettlement Action Plan (RAP) (as relevant) for the Project, consistent with ESS5.	Within 60 days of project effectiveness and thereafter implement the RPF throughout Project implementation. Prepare and implement the RAP prior to the commencement of civil works.	LGED and BWDB
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Adopt and implement mitigation measures to address biodiversity risks and impacts as part of the ESMF and ESMPs referenced under Action 1.1 above	Same timeframe as Action 1.1 above for the adaptation and implementation of the ESMF and ESMPs, respectively	LGED, BWDB and SDF
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
7.1	<p>INDIGENOUS PEOPLES PLAN</p> <p>1. Adopt and implement a Small Ethnic Communities Planning Framework (SECPF) for the Project, consistent with ESS7.</p> <p>2. Prepare and implement a Small Ethnic Communities Plan (SECP) based on the SECPF for each activity under the Project for which screening shows SECP is required, consistent with ESS7.</p>	<p>1. Prepare and disclose the SECPF within 60 days of effectiveness thereafter throughout Project implementation.</p> <p>2. Prepare and implement the SECP before commencement of any physical activities, implement the respective SECP throughout Project implementation.</p>	<p>LGED, BWDB and SDF</p>
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Not applicable.</p>		
8.2	<p>CHANCE FINDS</p> <p>Not applicable.</p>		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</p> <p>Not applicable.</p>		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Adopt 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.</p>	<p>Prior to Appraisal, and thereafter implement the SEP throughout Project implementation.</p>	<p>LGED, BWDB and SDF</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation 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.</p>	<p>Within one month of the PIU formation 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.</p>	<p>LGED, BWDB and SDF</p>

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<p>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.</p>		
<p>INDICATORS FOR IMPLEMENTATION READINESS [This subsection lists the ESCP actions (by their numbering in the first column of the ESCP) that are 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 for implementation readiness:</p> <ul style="list-style-type: none"> • E&S Audit completed for activities to be covered under retroactive financing • PIU with requisite E&S Consultants in place • Project GRM in place • All documents to be prepared within 60 days after effectiveness adopted and disclosed • For civil works to start: screening per the ESMF and Exclusion List in the ESMF, preparation and implementation of ESMP, RAP, SEA/SH Mitigation Action Plan, SECP as relevant. 		