

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

Department of Disaster Management

Ministry of Disaster Management and Relief

Department of Agricultural Extension

Ministry of Agriculture

Bangladesh Agricultural Development Corporation

Ministry of Agriculture

Bangladesh Sustainable Recovery, Emergency Preparedness and Response Project (B-STRONG)

Project Code: P508058

(DRAFT) Environmental and Social Commitment Plan (ESCP)

1. The People's Republic of Bangladesh (the Recipient) will implement the Bangladesh Sustainable Recovery, Emergency Preparedness and Response Project (B-STRONG) (the Project), implemented by 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); Department of Agricultural Extension (DAE), and the Bangladesh Agricultural Development Corporation (BADC), as a grantee of DAE, both under Ministry of Agriculture, Department of Disaster Management (DDM) under the Ministry of Disaster Management and Relief (MoDMR) 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 Financing Agreement and the Project Agreement (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, through LGED, BWDB, DAE, DDM, and/or SDF. The Recipient, through LGED, BWDB, DAE, DDM and/or SDF, 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 SUPPORT ¹			
A	ORGANIZATIONAL STRUCTURE <ol style="list-style-type: none"> 1. Establish and maintain a Project Implementation Unit (PIU) at LGED, BWDB, DDM, DAE (DAE and BADC will form a single PIU, which will be led by DAE) 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, DAE and BWDB PIUs will each hire 1 Environmental Specialist, 1 Social Specialist, and 1 Gender and GBV Specialist. The DDM PIU will hire 1 Environmental and Social Specialist. The SDF PIU will hire 1 Environmental and Social Specialist and 1 Community Specialist. 2. Hire a Design & Supervision Consultancy Firm (LGED), Supervision Consultancy Firm (BADC under DAE) and a Design, Supervision, Technical Assistance and Support 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. DDM will hire an Implementation Support Firm (DDM) which will include one E&S specialist. 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 for LGED, BWDB and SDF activities. DAE will hire one monitoring and evaluation firm including one E&S specialist to handle ES obligations for both DAE and BADC activities. DDM will hire one spot monitoring firm which will include one E&S focal. 	<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, DAE-BADC, DDM and SDF 2. LGED, DAE - BADC, DDM and BWDB 3. LGED, DAE-BADC, and DDM

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, DAE-BADC, BWDB, DDM 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, DAE-BADC, DDM, 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, DAE-BADC-BADC, DDM, 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, DAE-BADC, DDM, 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. SDF PIU to maintain all necessary documentation and record of such activities in compliance with ESF requirements. 2. An Environmental and Social Management Framework (ESMF) will be prepared and implemented for the project, consistent with the relevant ESSs 3. Subcomponent-wise site specific Environmental and Social Management Plans (ESMPs) will be prepared, as applicable per the ESMF. 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. The Labor Management Procedures (LMP) to be developed and implemented. 5. The SEA/SH Mitigation Action Plan to be developed and implemented, 6. A Resettlement Policy Framework (RPF) will be prepared and implemented. 7. A Small Ethnic Communities Planning Framework (SECPF) will be prepared and 	<ol style="list-style-type: none"> 1. Prior to disbursement of retroactive financing. 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, DDM, DAE-BADC, BWDB, and SDF 3. LGED, DDM, BWDB, SDF, and DAE-BADC 4. LGED, DDM, BWDB, SDF, and DAE-BADC 5. LGED, DDM, BWDB, and DAE-BADC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>implemented.</p> <p>8. Site-specific Small Ethnic Communities Plans (SECP) to be developed and implemented where relevant after screening.</p> <p>9. Resettlement Action Plans (RAPs) to be developed and implemented, as relevant based on site-specific screening and RPF. – to be disclosed and implemented.</p>	<p>5. Within 60 days of Effectiveness and before the hiring of any project workers</p> <p>6. Within 120 days of Effectiveness and thereafter implement throughout project implementation.</p> <p>7. Within 60 days of Effectiveness and thereafter implement throughout Project implementation.</p> <p>8. Before commencement of any physical activities that require it as per screening, implement the respective SECP throughout Project implementation.</p> <p>9. Prepare and implement the RAP prior to the commencement of relevant civil works.</p>	<p>6. LGED, BWDB DAE-BADC, and DDM</p> <p>7. SDF</p> <p>8. SDF</p> <p>9. LGED, DAE-BADC, and BWDB</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>	<p>LGED, DAE-BADC, DDM, BWDB and SDF</p>
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>	<p>Throughout Project implementation.</p>	<p>LGED, DAE-BADC, DDM, BWDB and SDF</p>
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</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</p>	<p>LGED, DAE-BADC, DDM, BWDB and SDF</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>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>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 accordance with their terms, throughout Project implementation.</p>	
1.5	<p>ASSOCIATED FACILITIES</p> <p>Not applicable.</p>		
1.6	<p>USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK</p> <p>Not Applicable.</p>		
1.7	<p>COMMON APPROACH</p> <p>Not Applicable.</p>		
1.8	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>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.</p> <p>2. Environmental and Social Audit to be conducted by third party prior to disbursement for activities subject to retroactive financing.</p>	<p>1. Before implementation of any activities that are to be retroactively financed.</p> <p>2. Before disbursement of retroactive financing.</p>	SDF
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>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.</p>	<p>Within 60 days of Effectiveness and prior to engaging any project workers and thereafter implement throughout Project implementation.</p>	LGED, DAE-BADC, DDM, BWDB and SDF
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Adopt and implement an Occupational Health and Safety (OHS) Management Plan to assess and manage the OHS risks and impacts of the Project.</p>	<p>Prior to commencement of any construction /physical works and thereafter implement throughout Project implementation.</p>	LGED, DAE-BADC, DDM, BWDB and SDF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>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.</p>	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	LGED, DAE-BADC, DDM, BWDB and SDF
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Management Plan (WMP) of post flood waste, construction and household waste, as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3. By leveraging assessment, planning, community engagement, and technological innovations, effective debris management can be achieved, paving the way for resilient and sustainable recovery efforts.</p>	Prepare the WMP prior to the commencement of any construction activities and thereafter implement the WMP throughout Project implementation.	LGED, DAE-BADC, DDM, BWDB and SDF
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMP.	LGED, DAE-BADC, DDM, BWDB and SDF
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMP.	LGED, DAE-BADC, DDM, BWDB and SDF
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>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.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	LGED, DAE-BADC, DDM, BWDB and SDF
4.3	<p>SEA AND SH RISKS</p> <p>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.</p>	Within 60 days after Effectiveness and thereafter implement throughout Project implementation.	LGED, DAE-BADC, DDM, BWDB and SDF
4.4	<p>SECURITY MANAGEMENT</p> <p>Not applicable.</p>		
4.5	<p>DAM SAFETY (FOR ANNEX A ESS4)</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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 relevant civil works.	LGED, DAE-BADC, and BWDB
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS The ESS6 is not relevant 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 such as repairing, restoration, and SDF works typically result in minimal disruption to local ecosystems and biodiversity. Therefore, the specific requirements and standards outlined in ESS6 are not necessary 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.	In case risks on sites of biodiversity value is identified during screening, measures to be taken as per mitigation hierarchy before any civil activities begin.	LGED, DAE-BADC, DDM, BWDB and SDF
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLAN 1. Adopt and implement a Small Ethnic Communities Planning Framework (SECPF) for the Project, consistent with ESS7. 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.	1. Prepare and disclose the SECPF within 60 days of effectiveness thereafter implement throughout Project implementation. 2. Prepare and implement the SECP before commencement of any physical activities that require it as per screening, thereafter, implement the respective SECP throughout Project implementation.	SDF
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Not applicable.		
8.2	CHANCE FINDS Not applicable.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Not applicable.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN 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.	Prior to Appraisal, to be updated within 60 days of Effectiveness, and thereafter implemented throughout Project implementation.	LGED, DAE-BADC, DDM, BWDB and SDF
10.2	PROJECT GRIEVANCE MECHANISM 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. Each PIU will operate its own GRM with GRCs formed as and where grievances originate. 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.	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.	LGED, DAE-BADC, DDM, BWDB and SDF
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].			
The following actions are indicators for implementation readiness: <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 • GRMs in place for each PIU • 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. 			