

People's Republic of Bangladesh

**Inclusive Services and Opportunities for Host Communities
and Displaced Rohingya Population (DRP)
(P500727)**

Draft
**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

21 February 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The People's Republic of Bangladesh (the Recipient) will implement the Inclusive Services and Opportunities for the Host Communities and Displaced Rohingya Population Project (the Project), with the involvement of six Implementing Agencies (Department of Disaster Management (DDM) under Ministry of Disaster Management and Relief (MoDMR); Ministry of Women and Children Affairs (MoWCA); Health Service Division (HSD) and Medical Education and Family Welfare Division (MEFD) under Ministry of Health and Family Welfare (MoHFW); Department of Primary Education (DPE) under Ministry of Primary and Mass Education (MoPME), and Department of Social Services (DSS) under Ministry of Social Welfare (MoSW)), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing (P500727) for the Project, as set out in the referred agreement.
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 Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
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, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (ES) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said ES instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the respective IA(s) and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient represented by the respective IA(s). The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of ES instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.</p>	<p>Submit semi-annual progress reports to the Association throughout Project implementation, commencing three months after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p>Project Management Unit (PMU) at DDM will receive and consolidate reports from all Project Implementation Units (PIUs) at MoWCA, HSD, MEFD of MoHFW, DPE, DSS and its own reports and send the consolidated report to the Association</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related 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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 24 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within 48 hours</p>	<p>PMU will consolidate/ coordinate reports from PIUs and will report to the Association.</p>

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE Establish and maintain a PMU and PIUs with qualified staff and resources to support management of ESHS risks and impacts of the Project and appoint one Environmental Specialist, one Social Specialist (with Gender expertise) in each PIU and the PMU.	Establish and maintain the PMU and PIU as set out in the Financing Agreement. Initiate the process for recruiting Specialists within one month of establishment of PMU and PIUs. Prior to the recruitment of the Specialists, assign one ES focal point from each PIU and the PMU to work in lieu of the Specialists.	PMU, PIUs
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS Adopt and implement an Environmental and Social Code of Practice (ESCoP) to screen all activities supported under the Project, and to assess and mitigate any ES risks and impacts from these activities. Any activities with substantial and high ES risk and impact shall be ineligible to receive financing under the Project.	Develop and adopt the ESCoP (including the exclusion list) within three months of the Effective Date and thereafter implement it throughout the Project implementation.	PMU/, PIUs
1.3	CONTINGENT EMERGENCY RESPONSE FINANCING a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements (including, CERC-ESMF) for the implementation of CERC, in accordance with the ESSs. b) Adopt any ES instruments which may be required for activities under CERCoF of the Project, in accordance with the CERC Manual (including CERC-ESMF) and the ESSs, and thereafter implement the measures and actions required under said ES instruments, within the timeframes specified in said E&S instruments.	a) The adoption of the CERC Manual (including CERC-ESMF) in form and substance acceptable to the Association is a withdrawal condition of the legal agreement for the Project. b) 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.	Will be decided upon activation of the CERC
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES	Develop the LMP prior to Appraisal and adopt and implement the LMP throughout Project implementation.	PMU/PIUs

	Adopt and implement a Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of worker relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (relating to SEA/SH), forced labor, child labor, grievance arrangements		
2.2	GRIEVANCE MECHANISMS FOR PROJECT WORKERS Adopt the Project Grievance Mechanisms so that the Project workers can raise issues and concerns about the project	Adopt the Project grievance mechanisms prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PMU/PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Adopt and implement resource efficiency and pollution prevention and management measures in the EScOP, consistent with ESS3.	Same timeline as action 1.2 above	PMU/PIUs
3.2	WASTE MANAGEMENT PLAN Adopt and implement a medical Waste Management code of practices to manage medical wastes in the EScOP consistent with ESS3.	Same timeframe as action 1.2 above	PIU at HSD

ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project and include mitigation measures in the ESCoP.	Same timeframe as action 1.2 above	PMU/PIUs
4.2	SEA AND SH RISKS Adopt and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH.	Develop and adopt the SEA/SH Action Plan within three months of the Effective Date, and thereafter implement the SEA/SH Action Plan throughout the Project implementation.	PMU/PIUs
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not Applicable		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Not Applicable		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLAN Adopt and implement measures to address impacts on the Small Ethnic Communities (SEC) in the ESCoP, consistent with ESS7.	Same timeframe as action 1.2 above	PMU/PIUs
7.2	GRIEVANCE MECHANISM Adopt the Project GRMs to address the issues of small ethnic communities being cognizant of the cultural, linguistic and social differences	Same timeframe as for the Project GRMs (ESS10)	PMU/PIUs
ESS 8: CULTURAL HERITAGE			
8.1	Not Applicable		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not Applicable		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION 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.	Develop the SEP by Appraisal and thereafter implement the SEP throughout the Project implementation.	PMU/PIUs

10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate accessible grievance mechanisms, 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>The grievance mechanisms 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>Establish, in each PMU/PIU, grievance redress mechanisms within three months of the Effective Date and thereafter maintain and operate the mechanisms throughout Project implementation.</p>	<p>PMU/PIUs</p>
<p>CAPACITY SUPPORT</p>			
CS1	<p>Develop and provide following types of capacity assessment/training to the relevant target groups, such as PMU/PIU staff, stakeholder community, project workers, consultants, etc:</p> <ul style="list-style-type: none"> • Introduction to World Bank ESF • Labor and working conditions including OHS • Community health and safety • Stakeholder Engagement • Preparation and implementation of ESCoP • ES compliance monitoring and audit • Incident reporting ESIRT • SEA/SH and mitigation measures • Bid document and ES issues • Planning and implementation of GRMs 	<p>Develop and provide capacity development measures beginning from three month of the Effective Date and continue throughout the Project implementation</p>	<p>PMU/PIUs</p>