

Government of the People's Republic of Bangladesh



Ministry of Local Government, Rural Development and Cooperatives

Local Government Division (LGD)

Local Government COVID-19 Response and Recovery Project
(LGCRRP)

World Bank Project Code: P174937

Draft

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
(ESCP)

March 2021





ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The People's Republic of Bangladesh is planning to implement the Local Government COVID-19 Response and Recovery Project (the **Project**), with the involvement of the Local Government Division (LGD) of the Ministry of Local Government, Rural Development and Cooperatives (MLGRDC). The Government of the Peoples Republic of Bangladesh has approached the International Development Association (hereinafter the Association) to provide financing for the Project and the Association is considering an Investment Project Financing (IPF).
2. The LGD on behalf of the People's Republic of Bangladesh will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**) of the World Bank Environmental Social Framework (ESF). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, specific documents or plans, as well as their timing.
3. The LGD will also comply with the provisions of all E&S documents required under the World Bank ESF and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Labor Management Procedure (LMP), and Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
4. The People's Republic of Bangladesh is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions are conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the *Association* by LGD as required by the ESCP and the conditions of the legal agreement, and the *Association* will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the *Association* and the People's Republic of Bangladesh, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the LGD will agree to the changes with the *Association* and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the *Association* and the People's Republic of Bangladesh. The LGD will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, Project performance result in changes to the risks and impacts during Project implementation, the People's Republic of Bangladesh shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts identified in accordance with the ESMF, LMP and SEP documented in this ESCP.



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING 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 and status of preparation and implementation of ES documents as follows:</p> <ol style="list-style-type: none"> 1. Site specific environmental and social management plans (ESMP and LMP); 2. ES appraisal of subprojects for COVID-19 Response Grants (CRGs) allocated to the eligible Urban Local Government Institutions (ULGIs) including ES screening and impact assessment, consultation, citizen engagement and grievance protocols. 3. Assessment of changes in the menu of investments triggering change in ES risks rating of the project. 4. Site observations on Contractor's performance on Environmental Social Health and Safety (ESHS) and other plans in ESMPs. 5. Summary of stakeholder engagement activities as stated in the SEP. 6. Summary of grievance management activities by participating ULGIs and the LGD relevant to the project. 7. Status of staffing and staff-time utilization at the PMU and Regional Support Centers (RSCs) and consultant resources with the ULGIs. 8. Capacity building/training activities undertaken for different project functionaries. 9. Project experience on difficulties and lessons for management improvement and recommendations. 	<p>Every six-months during the Project's implementation in conjunction with the Project's progress reports.</p>	<p>Local Government Division (LGD) with support from the Regional Support Centers (RSCs) and the Urban Local Government Institutions (ULGI) PIUs</p>



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<p>B</p> <p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project at the ULGI level which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including accidents that could result in fatalities, injuries, and incidents of SEA/SH, concerns of COVID-19 infections, serious mismanagement in handling waste, security breach, etc., provide sufficient details regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association within 24 hours of learning of the incident or accident. A report would be provided within a timeframe agreed with the Association.</p>	<p>LGD upon receipt of notification from the ULGIs. The concern ULGI will notify LGD and produce subsequent report as per specification and timeframe required by LGD as acceptable to the Association.</p>
<p>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</p>		
<p>1.1</p> <p>ORGANIZATIONAL STRUCTURE</p> <p>Establish a Project Management Unit (PMU) headed by the National Project Director (NPD). The PMU will function through Regional Support Centers (RSCs) to be established at 8 Divisional headquarters.</p> <p>The PMU will consist of a team of consultants [reporting to the NPD and the Deputy Project Directors (DPDs)]. The PMU at headquarters will engage a full time Senior Environmental Specialist, a full time Senior Social Specialist and a Communication and Citizen Engagement Specialist. The PMU will also engage one Environmental and Social Specialist and one Community Development Specialist for each of the 8 RSCs.</p> <p>LGD PMU will prepare, adopt and follow COVID-19 Response Protocol for contract management at the ULGI level following the guidelines of the Ministry of Health and Family Welfare (MoHFW), World Health Organization (WHO) and the Association.</p>	<p>Recruitment process of these 19 (nineteen) specialists (1 Senior Environmental Specialist, 1 Senior Social Development Specialist, 1 Communications and Citizen Engagement Specialist for PMU, and 8 Environmental and Social Specialist, and 8 Community Development Specialist for RSCs) will start within 15 days of Project effectiveness.</p> <p>If required, ULGI PIUs can also engage consultant resources using 5% of the CRGs allocated to them for complex subprojects with environmental and social risks.</p>	<p>LGD</p> <p>ULGI PIUs</p>



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<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Carry out site specific ES Impact Assessment (ESIA) in accordance with applicable national legal framework and the World Bank ESF and ES standards reflected in the project ESMF, to identify and assess environmental and social risks and impacts of project interventions including vulnerability to access development benefits, risks of SEA/SH and appropriate mitigation measures.</p> <p>Prepare, disclose, adopt, and implement site specific ESIA/ESMPs, and/or any other environmental and social plans (SEVCP, LMP) required for the Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSGs and relevant WHO Guidelines on COVID-19 response, in a manner acceptable to the Association.</p> <p>ESMF, SEP and LMP have been prepared and disclosed</p>	<p>ES screening at the identification and ESIA at detail design of subprojects prior to bidding and grant approval and updated within 30 days of any change. Apply the WHO standards on COVID-19 response in a manner consistent with ESS1.</p> <p>Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>Before appraisal</p>	<p>ULGI with support from RSCs</p> <p>LGD</p>
<p>1.3 MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Screen any proposed subproject in accordance with the ESMF prepared for the Project, and, thereafter, prepare, adopt, disclose and implement the subproject specific ESIA along with ESMF, with Waste Management Plan including e-waste management, OHS Plan, Community Health and Safety Plan and Traffic Management Plan as part of the ESMPs.</p>	<p>During detail design and before bidding process of the respective subproject.</p>	<p>ULGIs was assistance from RSCs</p>

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<p>1.4 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant ES documents and/or plans, and the LMP, into the Environmental, Social, Health and Safety (ESHS) specifications of the respective procurement documents with contractors. Bidding documents and works contracts will include relevant measures for labor management, workers Codes of Conduct (CoC) to ensure gender inclusion and management of risk of SEA/SH, incorporate relevant WHO Guidelines on COVID-19 response and other communicable diseases risks with respect to workers and surrounding communities.</p> <p>Preparation of Contractors-ESMP and other plans as described in 1.3 relevant for contractors at the City Corporation and Paurashava level.</p>	<p>During Bid document preparation and Prior to invitation of bid of the respective subproject.</p> <p>Prior to commencement of civil works</p>	<p>LGD, RSC and ULGIs;</p> <p>Contractor, ULGI, RSC</p>
<p>ESS 2: LABOR AND WORKING CONDITIONS</p>		
<p>2.1 LABOR MANAGEMENT PROCEDURES: The CRG subprojects shall be implemented in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate OHS measures (including COVID-19 response measures), provision of training on handling emergency situation especially health related issues and accidents; and setting out grievance arrangements for project workers, and incorporating labor requirements in the procurement documents and contracts with contractors and consultants. Ensure that child labor (any person under the age of 18), forced labor and trafficked persons are not employed under works contracts. If required, update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.</p>	<p>Will be implemented throughout Project implementation.</p>	<p>ULGIs with the help of RSC;</p> <p>LGD</p>
<p>2.2 GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism (GM) for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>GM for the workers will be established for every works package before commencement of civil works and it will</p>	<p>ULGI and contractors with help from respective RSC;</p>



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Other than GM at works site, responsive system will be in place at the RCSC and the PMU.	remain operational throughout works contract implementation.	Funding from the subproject budget.
2.3 OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Prepare, adopt, and implement occupational, health and safety (OHS) measures including health protocol in response to the COVID-19 and other communicable diseases as specified in the LMP and ESMP.	Before commencement of civil works and remain operational throughout works contract implementation.	ULGI and contractors with help from respective RSC; Funding from the subproject budget.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1 RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Develop and implement site specific ESIs along with the ESMPs in accordance with ESMF. The ESMPs includes pollution prevention measures and take initiative to reduce, reuse or recycle waste material to the extent possible. Wastes generated in the sanitary systems and e-wastes under the digital support component to be disposed in a manner that does not harm the environment and human health and in an environmentally safe manner as detailed in the relevant ESMP. For any infrastructure repair/rehab works, the energy/water efficiency measures detailed in ESS 3 will be taken into consideration in the ESMPs.	The site specific ESMPs to address the issues of resource efficiency and pollution prevention to be developed as soon as project specific locations are known and before commencement of civil works and remain operational throughout works contract implementation.	ULGI and contractors with help from respective RSC; Funding from the subproject budget.
ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1 TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action 1.3 above.	Before commencement of civil works and remain operational throughout works contract implementation.	ULGI and contractors with help from respective RSC; Funding from the subproject budget.



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<p>4.2 COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from subproject activities, including, inter alia, workers behavior, risks of labor influx, risks of SEA/SH incidents, emergency situations, infectious diseases including COVID-19, and include these measures in the ESMPs to be prepared in accordance with the ESMF, and WHO guidelines of social distancing and other measures. in a manner acceptable to the Association.</p> <p>Response measures are included in the SEP along with a Subproject level Grievance Mechanism (GM) under SEP as well as a labor related GM under LMP. Project GM will also manage the risks of SEA/SH.</p>	<p>throughout Project implementation (including all required updates to the documents).</p>	<p>LGD, RSCs and ULGIs</p> <p>Funding from the Subproject budget.</p>
<p>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</p>		
<p>5.1 Not relevant. Involuntary acquisition of land and displacement of people are listed as conditions of non-eligible expenditure in the ESMF. ES screening of subprojects for CRGs will confirm the exclusion.</p>	<p>At the time of identification and design CRG subprojects.</p>	<p>LGD, RSCs and ULGIs</p>
<p>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</p>		
<p>6.1 BIODIVERSITY RISKS AND IMPACTS: Given the information available during assessment, the project is not likely to affect any biodiversity or living natural resources. The ESMF will include a negative list of interventions for project finance to this effect.</p>	<p>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.</p>	<p>ULGI, RSCs and LGD</p>
<p>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</p>		
<p>7.1 INDIGENOUS PEOPLES PLAN: The project is covering only the urban areas without presence of indigenous peoples as per ESS7. But small ethnic community peoples are existent in some of the ULGIs mainstreamed with the urban vulnerable population. These community</p>	<p>Throughout the project areas</p>	<p>ULGIs and LGD;</p>



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will be dealt with adequate culturally appropriate manner being cognizant of their social belief and cultural system.		
ESS 8: CULTURAL HERITAGE.		
8.1 Not relevant. However, a chance find procedure will be included in works contracts requiring contractors to stop construction if cultural heritage is encountered during any work and to notify and closely coordinate with relevant mandated country authority for the salvaging and restoration of such cultural heritage.	During preparation of bid documents	ULGI, RSCs and contractors Funding from the Project budget.
ESS 9: FINANCIAL INTERMEDIARIES		
9.1 Not applicable		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1 STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Implement the SEP through the RSCs and the ULGIs. The SEP may be amended anytime during implementation in agreement with the Association and it will be updated and redisclosed to address any remaining issues including information on broader consultations with PAPs/vulnerable groups on the project design; broader and more detailed identification of PAPs, OIPs and vulnerable groups; and revision of the stakeholder engagement program for the lifetime of the project. Every ULGIs will have site specific SEP.	The project SEP will be updated and redisclosed withing 90 days of effectiveness. ULGI specific SEPs will be prepared during subproject design and adopted before commencement of works contract implementation.	LGD, ULGIs
10.2 PROJECT GRIEVANCE MECHANISM Prepare, adopt, maintain, and operate a grievance mechanism, as described in the SEP.	Prior to project effectiveness and updated from time to time as needed and maintained throughout project implementation.	LGD



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CAPACITY SUPPORT (TRAINING)		
<p>LGD and ULGIs staff and consultants at the PMU and RSCs of LGD and with PIUs of ULGIs will be given capacity building training and orientation on environmental, social, health and safety (ESHS) management following the national legal and policy requirements, international treaties, WHO guidelines and the World Bank ESF, with support of PMU E&S specialists. LGD will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts. This ESCP proposes a preliminary training plan that can be adapted to meet needs during Project implementation.</p>		
<p>CS1</p> <p>Training on World Bank ESF and the 10 ESSs—including preparation of ESMP, RP, LMP, SEP</p> <p>Participants: Project staff and consultants at the LGD PMU and RSCs and the ULGI PIUs</p> <p>Duration: 9 days</p>	<p>LGD Staff: Within year 1 of Project effectiveness.</p> <p>ULGI Staff: Within first month of approval of the grant application.</p>	<p>PMU E&S Specialists</p>
<p>CS2</p> <p>Infectious Diseases and COVID-19 Response Protocol:</p> <ul style="list-style-type: none"> • Use and disposal of PPE (for all) • Working in COVID-19 environment (construction workers) • COVID-19 Infection Prevention and Control mechanism • Standard precautions for COVID-19 (social distancing etc.) • Risk communication, prevention, and community engagement (Administrative and operational personnel) • WHO and CDC guidelines on quarantine • Compliance with the obligations of The Communicable Diseases (Prevention, Control and Eradication) Act, 2018 <p>Participants:</p>	<p>LGD Staff: Within year 1 of Project effectiveness.</p> <p>ULGI Staff: Within a month of approval of the grant application.</p>	<p>PMU E&S Specialists</p>



MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>Project staff and consultants at the LGD PMU and RSCs and the ULGI PIUs Duration: 3 days</p> <p>Occupational Health and Safety Module:</p> <ul style="list-style-type: none"> • 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 <p>Participants: Project staff, consultants, and contractors Duration: 3 days</p>	<p>1. Within year 1 of Project effectiveness. 2. Thereafter, orientation every six months interval for LGD staff and consultants. 3. ULG/Contractors' staff/worker: Within a month of site mobilization; and 4. Each alternative month upon mobilization of contractors on site.</p>	<p>PMU E&S Specialists</p>





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<p>CS4</p> <p>Labor and Working Conditions</p> <ul style="list-style-type: none"> • Terms and conditions of employment according to national working laws and regulations • Labor code of conduct • Contractor and sub-contractor Codes of Conduct • Worker's organizations • Child labor and minimum age employment rules <p>Participants:</p> <ul style="list-style-type: none"> • Project staff, consultants, and contractors • Duration: 3 days 	<ol style="list-style-type: none"> 1. ULGI/Contractors' staff/worker: Within a month of site mobilization; and 2. Each alternative month upon mobilization of contractors on site. 	<p>PMU E&S Specialists</p>
<p>CS5</p> <p>Grievance Redress Mechanism, design and production of a training module addressing the following aspects:</p> <ul style="list-style-type: none"> • Registration and processing procedure • Grievance redress procedure • Documenting and processing grievances • Use of the procedure by different stakeholders <p>Participants:</p> <ul style="list-style-type: none"> • Project staff, consultants, and contractors • Duration: 3 days 	<ol style="list-style-type: none"> 1. Within year 1 of Project effectiveness. 2. Thereafter, orientation every six months interval for LGD staff and consultants. 3. ULGI/Contractors' staff/worker: Within a month of site mobilization; 	<p>PMU E&S Specialists</p>



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<p>CS6</p> <p>GBV Risk Management including SEA/SH</p> <p>Raising awareness and measures to prevent and mitigate GBV/SEA/SH risks.</p> <p>The topics and activities will be developed and included in the Project GRM with protocols for confidentiality and acknowledgement.</p> <p>Participants:</p> <p>Project staff, consultants, and contractors</p> <p>Duration: 3 days</p>	<p>1. Within year 1 of Project effectiveness.</p> <p>2. Thereafter, orientation every six months interval for LGD staff and consultants.</p> <p>3. ULGI/Contractors' staff/worker: Within a month of site mobilization.</p>	<p>PMU E&S Specialists</p>

