

**Department of Public Health Engineering (DPHE)
Palli Karma-Sahayak Foundation (PKSF)**

**BD Rural Water, Sanitation and Hygiene for
Human Capital Development Project**

**ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

April, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Bangladesh (GoB)(the **Recipient**) will implement the BD Rural Water, Sanitation and Hygiene for Human Capital Development Project (the **Project**), with the involvement of Department of Public Health Engineering (**DPHE**) and Palli Karma-Sahayak Foundation (**PKSF**).The International Development Association, IDA (the **Association**) has agreed to provide financing for the Project.
2. The Recipient will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), Labor Management Plan (LMP), and Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the DPHE and PKSF 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 the Recipient 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 Recipient, 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 Recipient 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 Recipient. The Recipient will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank, regular monitoring reports on 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 E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Submit Half yearly (every six months) reports in an agreed format throughout Project implementation.</p>	<p>DPHE and PKSF (Implementing Agencies, IAs)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank 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 accidents that could result in fatalities, injuries, cases of GBV/SEA, 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 World Bank within 24 hours of learning of the accidents or incidents.</p> <p>A report on action taken to be provided on the same by 07 (Seven) days of notifying the Bank.</p>	<p>IA</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Recruit (for each PMU) an Environmental Specialist (ES) – responsible for addressing environmental risks/impacts, occupational health and safety issues as well as waste management issues, a Social Development Specialist (SDS) – responsible for addressing risks associated with social issues (labor, Gender, OHS) and a Health Specialist (HS) – responsible for monitoring and ensuring application of COVID-19 protocol of Ministry of Health and Family Welfare (MoHFW) and World Health Organization (WHO) with qualifications, experience and under terms of reference satisfactory to the Bank.</p>	<p>Recruitment process of these 3 (three) specialists (ES, SDS and HS) for each PMU will start within 15 days of Project effectiveness. The specialists will provide inputs as necessary throughout the Project implementation. Until the recruitment, the IA's existing staff will support the project's E&S management.</p>	<p>IA</p>

1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT Prepare and disclose the Environmental and Social Management Framework (ESMF) Prepare and disclose ESIA's for sub-projects</p>	<p>Prior to Project appraisal and updated within 30days of project effectiveness. During detailed design stage of each sub-project</p>	IA
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS Prepare, disclose, update and implement the Environmental and Social Management Plan (ESMP) for each sub-project</p>	<p>During detailed design phase of each sub-project and implemented during construction</p>	IA
1.4	<p>MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures (LMP), into the Environmental, Social, Health and Safety(ESHS) specifications of the respective procurement documents with contractors. Thereafter, ensure that the contractors comply with the ESHS specifications of their respective contracts. Bidding documents and contracts to include relevant measures in the ESMP, including written Codes of Conduct to mitigate COVID-19 risks with respect to its workers and surrounding communities. Preparation of Contractors-ESMP and other plans such as Waste Management Plan, OHS Plan, Community Health and Safety Plan, Labor Management Plan, Traffic Management Plan, Waste Management Plan, Workers' Camp Management Plan, etc.</p>	<p>Prior to issuance of EOI notice for contractors During Bid document preparation Prior to commencement of civil works</p>	IA

ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), ensuring appropriate working condition amidst a public health emergency (including potential mass outbreak of COVID-19); provision of training on handling emergency situation especially health related issues; and setting out grievance arrangements for Project workers, and incorporating labor requirements in the procurement documents and contracts with contractors and supervising firms. The Recipient will prohibit child labor (any person under the age of 18), forced labor and trafficked persons.</p> <p>Prepare, update, adapt, and implement the Labor Management Procedures (LMP)</p>	<p>ESS2 measures will be implemented throughout Project implementation.</p> <p>Prepared prior to project appraisal, updated within 30 days after the date of project effectiveness and maintained throughout Project implementation.</p>	IA and Contractor
2.2	<p>GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a GRM for the Project which will include issues of Project workers, as described in the LMP and consistent with ESS-2.</p>	<p>GRM for the workers will be established before commencement of Project activities and it will remain operational throughout Project implementation.</p>	IA and contractors
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in LMP, especially measures related to mitigating COVID-19 risks.</p>	<p>Before beginning of the Civil works and maintained throughout Project implementation</p>	IA

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Develop and implement site specific ESMPsin accordance with the updated ESMF for pollution prevention and take initiative to reduce, reuse or recycle waste material to the extent possible. Wastes generated in the sanitary system (septage) be treated, transported and disposed in a manner that does notnot harm the environment and human health and in an environmentally safe manner as detailed in the relevant ESMP.</p>	<p>ESMPs to address the issues of resource efficiency and pollution prevention to be developed as soon as project specific locations are known and before beginning of civil works.</p> <p>IA</p>
ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1	<p>Put measures in place to prevent or minimize the spread of the infectious diseases/COVID-19 to the community and among workers/labor camps by following national and WHO guidelines of social distancing and other measures.</p> <p>Ensure the avoidance of allforms of Sexual Exploitation and Abuse by establishingwritten Codes of Conduct for all workers in the project area as well as train and sensitize them on this issue. The IA has already prepared SEP and will adopt and implement a Project Grievance Redress Mechanism (GRM) under SEP as well as a labor related GRM under LMP. Project GRM will also manage the risks of GBV and Sexual Exploitation and Abuse (SEA).</p> <p>Ensure that any security personnel deployed in the Project area follow strict rules of engagement and avoid any escalation.</p>	<p>ESMF and SEP have been prepared and community health and safety issues described therein will be adopted and followed throughout Project implementation (including all required updates to the documents).</p> <p>IA</p>

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS: Prepare abbreviated RAPs if the site screenings indicated the existence of squatters and adverse impacts on livelihoods.	Prior to project implementation.	IA
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS: Carryout screening to identify any potential sensitive sites of biodiversity value in or near proposed intervention sites and carryout site-specific assessment to identify potential impacts and propose appropriate mitigation measures.	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.	IA
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLAN: Develop Small Ethnic Minorities and Vulnerable People Plans if such communities exhibit characteristics mentioned in ESS7.	Before project implementation if communities exhibit characteristics mentioned in ESS7.	IA
ESS 8: CULTURAL HERITAGE			
8.1	Include a chance finds procedure 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 document	IA
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Ensure that both wholesale and retail MFIs prepare, adopt, and maintain their Environmental and Social Management System (ESMS). Ensure MFIs establish and maintain organizational capacity and competency for implementing the ESMS with clearly defined roles and responsibilities (where relevant, identify specific positions/resources for E&S management that are a part of the organizational structure). Ensure MFIs designate a senior management representative to have overall accountability for environmental and social	IA will ensure all ESMSs are in place before project implementation. World Bank will review the ESMSs. A Financial Intermediary Study has already been conducted on PKSF by the Finance Competitiveness and Innovation (FCI) team at the Bank	IA and World Bank

	performance of MFIs subprojects.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Prepare, update, adopt, and implement a Stakeholder Engagement Plan (SEP)</p> <p>PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP</p>	<p>Prior to project appraisal and adopted, updated and implemented throughout the Project implementation period.</p> <p>Prior to project effectiveness and updated from time to time as needed and maintained throughout project implementation.</p>	IA

CAPACITY DEVELOPMENT SUPPORT (TRAINING)		
Specify Training to be provided	Targeted Groups and Timeframe	Training Completed
The IA, with support of third-party resources as needed (independent experts, NGOs, etc) 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 covering the following topics. This plan will be adapted to meet needs during Project implementation.		
ESF. Training on ESF and the 10 ESSs—including preparation of ESMP	Personnel directly related with project at the IA	Prior to Project effectiveness
Issues Related to COVID-19 <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 	Officials of IA, Locally active NGOs, Civil Work Contractors, Workers	Prior to the Project effectiveness
Occupational Health and Safety Module: <ul style="list-style-type: none"> • ESMP implementation • Workplace risk management 	Officials of IA, Locally active NGOs, Civil Work Contractors, Workers	Prior to the Project effectiveness and continue half yearly throughout the project

<ul style="list-style-type: none"> • Prevention of accidents at work sites • Health and safety rules • Solid and liquid waste management • Preparedness and response to emergency situations 		
<p>Labor and Working Conditions</p> <ul style="list-style-type: none"> • Terms and conditions of employment according to national working laws and regulations • Contractor and sub-contractor Codes of Conduct • Worker’s organizations • Child labor and minimum age employment rules 	<p>IA Local officials, Contractors Health Safety Officer, Labor Sardars (Leaders)</p>	<p>Prior to the Project effectiveness</p>
<p>Grievance Redress Mechanism Module, 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>ES, SDS, HS, Local Governments, Civil Society, Local NGOs, Contractors,</p>	<p>Prior to Project effectiveness and thereafter once every six months</p>
<p>GBV Risk Module Raising awareness and measures to prevent and mitigate GBV risks. The topics and activities will be developed included in the Project GRM</p>	<p>IA Local officials, Contractors Health Safety Officer, Labor Sardars (Leaders), Local NGOs, OCC Staffs</p>	<p>Prior to Project effectiveness and thereafter yearly</p>
<p>Waste Management Caretakers appointed for each water point will be trained for operation and maintenance, with a special focus on safe disposal of waste water including necessary training and awareness on sanitation technology and management. Training of local sweepers for safe management of fecal sludge will be implemented.</p>	<p>Caretakers of water points and local sweepers</p>	<p>Upon assignment of the caretakers and sweepers</p>