



Government of the People's Republic of Bangladesh

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

**Local Government Division (LGD)
Ministry of Local Government, Rural Development
and Cooperatives (MLGRD&C)**

www.lgd.gov.bd

Environmental and Social Management Framework (ESMF)

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Executive Summary

Introduction. This Environmental and Social Management Framework (ESMF) has been prepared for the Local Government COVID-19 Response & Recovery Project (the Project) to identify, design and implement activities responding to the requirements of the national legal framework and the World Bank's Environmental and Social Framework (ESF). The Government of Bangladesh (GoB) has prepared this project with financing from the International Development Association (IDA) of the World Bank Group (WBG). The project is expected to strengthen the response and recovery efforts of the urban local government institutions (ULGIs), Paurashavas (PSVs) and City Corporations (CCs), in response to the COVID-19 pandemic in Bangladesh. The Local Government Division (LGD) in the Ministry of Local Government, Rural Development and Cooperatives (MLGRD&C) will be implementing the project including management of relevant fiduciary and environment and social requirements for all the project components. The project will benefit 39.90 million residents of 329 PSVs and 12 CCs across the country.

The project will support ULGIs to: (i) ensure continuity of basic urban services; (ii) ramp up local level COVID-19 responses in services, health, jobs and livelihoods, community outreach and awareness, and local economic development; (iii) mobilize and coordinate across various agencies operating at the local level; and (iv) strengthen their pandemic and disaster response systems. The project, under Component 1 will support the ULGIs with COVID-19 Response Grants (CRGs) for small – scale infrastructural activities responding to impacts of COVID-19 pandemic and under Component 2 for capacity building of ULGIs. A contingency emergency response component (CERC) is included as Component 3 for situations of urgent need of assistance.

Purpose of the ESMF. World Bank Environmental and Social Framework (ESF) will apply to the Project in addition to national legislative requirements for environmental and social management. The ESMF will provide guidance on pre-investment works/studies (such as environmental and social screening, environmental and social assessment, environmental and social management plans, etc.), provide set of steps, procedures, and mechanisms for ensuring adequate level of environmental and social considerations, and integration in each investment in the project-cycle.

Application of GoB Policies, Acts and Rules. The project activities will not have significant or irreversible impacts on the surrounding environments or communities, but likely to have localized minimal impacts. As per Environmental Conservation Rules (ECR)'97, most the activities associated with project components/sub-components are likely to fall under either Orange A or Orange B categories. The project will conduct environmental and social screening for all activities at the initial stage and based on screening results, and if recommended by the Department of Environment (DoE), further IEE or ESIA will be carried out for specified activities. DoE is the regulatory body and the enforcement agency of all environmental related activities in development projects.

Relevancy of WB ESF. All Environmental and Social Standards (ESSs) of the World Bank ESF will be applicable to the project, except ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources, ESS 7: Indigenous Peoples, ESS 8: Cultural Heritage, and ESS 9: Financial Intermediaries and WB's legal

operational policies related to projects on international waterways (OP 7.50) ,and Disputed Areas (OP 7.60) will not be relevant to the proposed project activities.

Key Environmental and Social Risks. Considering the intensity of the associated environmental and social risk and impacts, the Project E&S risks have been rated as ‘**Moderate**’, as most of the impacts are localized and reversible in nature. Given the likely activities (rehabilitation and development of small-scale community infrastructure) to be financed, the project is not likely to lead to impacts that may pose substantial or high environmental and social risks to the project. Construction impacts will entail air and water pollution, noise emissions and waste generation. These adverse impacts are expected to be limited and site specific and will be minimized, avoided, or compensated with careful design and implementation of site specific ESMPs. The activities with substantial/significant environmental impacts including those generating hazardous waste are included in the negative list of activities the project will not finance. All activities will be designed and implemented using existing available land avoiding involuntary acquisition of land and displacement of people. Presence of small ethnic communities with indigenous status meeting the criteria of ESS7 is not likely in the urban areas. Implementation approach will be inclusive, transparent, and participatory. The environmental and social risks that require pre-mitigation include: (i) poor labor and working environment; (ii) occupational health and safety of project workers including induced risks regarding workplace and community health and safety; (iii) noise, vibration, and dust pollution including waste generation and management associated with civil works; (iv) induced risk of gender-based violence (GBV), sexual exploitation and abuse (SEA) and sexual harassment (SH); (v) potential for hiring child labor for civil works; and (vi) ensuring equitable project benefits to the indigenous and other disadvantaged and vulnerable communities.

General Principle for E&S Management. The ESMF is prepared based on the following principles to lead the planning and implementation of the proposed project activities.

- Site specific IEE, ESIA and ESMP will be prepared for activities as determined by DoE. In case, requirements of DoE’s ESIA guideline differs from those of WB ESF, the more stringent standards and requirements will apply. The subprojects will be handled with appropriate mitigation or compensation measures during implementation.
- Planning and design of the any additional activities should ensure assessment of cumulative impacts.
- Participation of stakeholders (especially local communities) will be ensured through continuous consultations and information disclosure, as well as providing differentiated scope for the disadvantaged and vulnerable people, by PIU/ULGIs in planning, implementation, and monitoring of sub-project activities.
- PIU/ULGIs and PMU/LGD on the Project will ensure appropriate institutional set up with dedicated E&S staff for implementing environmental and social management plans and inter-agency coordination.
- PIU/ULGIs will ensure that bidding documents for construction contractors have specific clauses related to implementation of ESMPs, as required.
- Project workers engaged by contractors in project civil works should be provided with adequate health and safety facilities. Worker’s/crew’s health and safety measures shall be ensured and use of personal protective equipment shall be required.

- PIU/ULGIs at the local level and PMU/LGD at the national level will inform project stakeholders about project interventions and its potential impacts on the surrounding environmental and social elements.
- **Activities with the following attributes will be ineligible for financing under the project:**
 - E&S Impacts identified in IEE/ESIA categorize the project as substantial or high risk (according to ESF).
 - Require land acquisition, or cause involuntary physical displacement, or result in loss of livelihoods of peoples.
 - Associate adverse impacts on the small ethnic communities with indigenous status as per the World Bank ESS7.
 - Associate significant environmental impacts, including those that significantly increase greenhouse gas emissions, hazardous waste and impact of natural habitats and biodiversity.
- In case of triggering the CERC, the LGD will update the ESMF to cover the activities supported under the CERC. A list of Positive and Negative activities for CERC component is given in Annex 6.

E&S Management and Implementation Arrangements. LGD will establish a Project Management Unit (PMU), headed by a National Project Director (NPD) and assisted by two or more Deputy Project Directors (DPDs) deputed by LGD. LGD will establish Regional Support Centers (RSCs) in each of the eight administrative Divisions for implementation of the project. Each RSC will be staffed by consultants, recruited by the PMU including for E&S and community development support. A high-level Project Steering Committee (PSC), chaired by the Secretary LGD will be set up at the ministry.

Each participating ULGI will establish a small Project Implementation Unit (PIU) responsible for ensuring that planning, budgeting, implementation, and reporting are undertaken in accordance with project procedures. PIUs will consist of regular ULGIs staff, deputed on a part-time basis to coordinate project financed activities at the local level.

The PMU in LGD will include a Senior Environmental Specialist, a Senior Social Development Specialist, and a Communications and Citizen Engagement Specialist. The RSCs will also have Environmental and Social Specialist and Community Development Specialist consultants. The PIUs in the ULGIs will be supported by LGD through RSCs for E&S management in subproject processes.

Environmental and Social Assessment and Management Process. The PMU through RSCs will provide technical support to the PIUs in environmental and social screening, impact assessment and preparation of management plans. The RSCs will support the PMU in E&S appraisal of the CRG proposals from the PIUs. Following are the procedures for E&S management in subproject cycle.

- If E&S screening identify any activities that requires further E&S assessment, respective PIUs will engage an independent E&S consultant to generate a detail environmental and social baseline of the subproject, conduct IEE and the ToR for ESIA (if recommended by DoE). The PIUs will share their IEE reports and the ESIA ToRs with DoE for Clearance.
- The PMU will review and clear screening and environmental and social assessment reports of the PIUs before submitting for DoE clearance and provide necessary technical inputs.
- PMU through RSCs will conduct verification of screening and assessment through field visits.

- RSCs through relevant staff of PIUs will ensure that environmental and social considerations are given enough attention, weight, and influence over selection of construction sites and improvement of infrastructures.
- Bid documents will be prepared by the PIUs. RSCs will make sure necessary environmental and social clauses are included in the bidding documents and ESMP implementation should be done by Contractors. RSCs and PIUs of the respective ULGI will supervise ESMP implementation and E&S compliance.
- All the activities of the project will follow Environmental Code of Practices (ECOPs) prepared under the ESMF.
- The project will ensure that ESIA addresses all potential environmental and social direct and indirect impacts of the project throughout its life cycle; and suggest appropriate mitigation measures. If any additional impacts are identified, IEE/ESIAs and ESMP should be reviewed and updated.

Capacity Building Plan (CBP). Capacity building for environmental and social management will need to be carried out for all staff and consultants at the PMU and PIUs and those of the contractors. At the construction site, respective PIUs will lead implementing the capacity building plan, though the contractors will also be responsible to conduct trainings for their workers. The various aspects that are covered under the capacity building will include general environmental and social awareness, key environmental and social sensitivities of the sites, key environmental and social impacts, ESMP requirements, OHS aspects, and waste disposal including e-wastes.

Disclosure and Consultations. Considering the COVID-19 pandemic, basic information for preparing the ESMF was collected through sending checklist to select ULGIs and virtual consultations with different stakeholders at several ULGIs. The ESMF will be disclosed to the local and national level stakeholders through workshops, consultation meetings, and advertisement in print and electronic media. A national workshop will be held at Dhaka and stakeholders' meetings will be held at some selected PSVs/CCs to disclose the ToRs and results of the IEE and ESIA. Workshops and stakeholders' meetings will be organized following COVID-19 protocols. Summary of the ESMF and the subsequent E&S tools will be translated into Bengali language and disclosed locally. A separate Stakeholders Engagement Plan (SEP) has been prepared for the project, which will be the main guiding document for the PIUs and the PMU for information disclosure and stakeholders' consultation.

Grievance Redress Mechanism (GRM). Considering the overall need for the total project period, a central GRC will be established at the project PMU level to oversee the whole GRM operation, deal with strategic level grievances (Project planning and design issues, major social and environmental risks and impacts and issues that are beyond the scope and complexity to deal with other GRCs). The Division level RSCs will establish GRCs to administer grievances raising in their own areas of responsibilities, i.e. in the ULGIs/PIUs of that Division. Uptake channels at various PIUs will be established where grievances will be received by dedicated desk, where complainants can go physically to register complaints. The GRCs will help to resolve issues/conflicts amicably and quickly, saving the targeted affected individuals and communities, vulnerable groups, project workers and other aggrieved persons resorting to expensive, time-consuming legal actions. The project will, however, not bar stakeholders from seeking resolution through courts of law on grievances that were not resolved through the project GRM.

List of Acronyms

BDT	Bangladeshi Taka	LIPW	Labor Intensive Public Works
CC	City Corporation	LMP	Labor Management Procedures
CE	Citizen Engagement	M&E	Monitoring and Evaluation
CERC	Contingency Emergency Response Component	M&E	Monitoring and Evaluation
C-ESMP	Contractor's Environmental and Social Management Plan	MC	Minimum Condition
CHT	Chittagong Hill Tract	MC	Minimum Condition
CRG	COVID-19 Response Grant	MGSP	Municipal Governance Support Project
DoE	Directorate of Employment	MoHFW	Ministry of Health and Family Welfare
DRM	Disaster Risk Management	MIS	Management Information System
E&S	Environmental and Social	MIS	Management Information System
EA	Environmental Assessment	MLGRD&C	Ministry of Local Government, Rural Development and Co-operatives
EAP	Emergency Action Plan	MoEFCC	Ministry of Environment, Forest and Climate Change
ECA	Environmental Conservation Act	MoLGRD&C	Ministry of Local Government, Rural Development and Co-operatives
ECC	Environmental Clearance Certificate	MoU	Memorandum of Understanding
ECOP	Environmental Code of Practices	NGO	Non-Government Organization
ECR	Environment Conservation Rules	NOC	No Objection Certificate
EHS	Environmental, Health and Safety	NPD	National Project Director
EIA	Environmental Impact Assessment	OHS	Occupational Health and Safety
ENB	Environment, Natural Resources and Bule Economy	OP	Operational Policy
ESA	Environmental and Social Assessment	PAD	Project Appraisal Document
ESCP	Environmental and Social Commitment Plan	PAP	Project Affected Persons
ESF	Environmental and Social Framework	PIU	Project Implementation Unit
ESIA	Environmental and Social Impact Assessment	PM	Practice Manager
ESMF	Environmental and Social Management Framework	PMU	Project Management Unit
ESMP	Environmental and Social Management Plan	POM	Project Operations Manual
ESS	Environmental and Social Standards	PPE	Personnel Protective Equipment
FGD	Focus Group Discussion	PRA	Participatory Rural Appraisal
FIDIC	International Federation of Consulting Engineers (Fédération Internationale Des Ingénieurs-Conseils)	PSC	Project Steering Committee
FM	Financial Management	PSV	Pourashava (municipality)
FPIC	Free, Prior and Informed Consent	RAP	Resettlement Action Plan
GBV	Gender-Based Violence	RPF	Resettlement Policy Framework
GRM	Grievance Mechanism	RSA	Regional Standards/Safeguards Advisor
GoB	Government of Bangladesh	RSC	Regional Support Center
GRC	Grievance Redress Committee	SEA	Sexual Exploitation and Abuse
GRM	Grievance Response Mechanism	SEC	Small Ethnic Community
IA	Information Access	SEVCP	Small Ethnic and Vulnerable Community Plan
IDA	International Development Association	SEP	Stakeholders Engagement Plan
IEE	Initial Environmental Examination	SH	Sexual Harassment
IFC	International Finance Corporation	SSI	Social Sustainability and Inclusion
ILO	International Labor Organization	TLCC	Town-level Coordination Committee
IPF	Investment Project Financing	ToR	Terms of Reference
LGCRPP	Local Government COVID Response & Recovery Project	ULGI	Urban Local Government Institution
LGD	Local Government Division	UP	Union Parishad
LGSP	Local Governance Support Project	WB	World Bank
		WBG	World Bank Group
		WC	Ward Committee
		WHO	World Health Organization

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Chapter 1: INTRODUCTION

1.1 Background

The Government of Bangladesh (GoB) through the Ministry of Local Government, Rural Development and Cooperatives (MLGRD&C) has requested financing from the International Development Association (IDA) of the World Bank Group (WBG) to support the preparation and implementation of the Local Government COVID-19 Response & Recovery Project (LGCRRP, the Project) through the Local Government Division (LGD), to strengthen the response and recovery effort of urban local government institutions (ULGIs) to the COVID-19 pandemic in Bangladesh. The project finance from the World Bank is expected through Investment Project Financing (IPF) on IDA terms. The LGD will have overall responsibility for the implementation of project activities including fiduciary management and environmental and social (E&S) compliance for all the components and sub-components. The project will support all urban LGIs of Bangladesh including 329 Pourashavas (PSVs), with a total population of approximately 20.2 million, and 10 City Corporations (all except Dhaka North and Dhaka South), with a total population of another approximately 10.35 million.

The LGCRRP will provide financial resources and capacity support to urban LGIs to: (i) ensure continuity of basic urban services; (ii) ramp up local level COVID-19 responses in services, health, jobs and livelihoods, community outreach and awareness, and local economic development; (iii) mobilize and coordinate across various agencies operating at the local level; (iv) strengthen pandemic and disaster response systems. It will strengthen the Government of Bangladesh's pandemic response and recovery by: (i) directing scarce resources to critical COVID-19 hotspots, which are typically in dense urban settlements, especially targeting the urban poor, migrant workers, and vulnerable demographic groups; (ii) ensuring coordination and bringing synergies between national, sectoral, and local level initiatives; and (iii) providing a continuum between immediate emergency responses and short to medium term recovery.

The World Bank Environmental and Social Framework (ESF) will apply to the LGCRRP in addition to national legislative requirements on environmental and social management. This Environmental and Social Management Framework (ESMF) has been prepared as per requirements of the applicable legal and policy framework of the Government of Bangladesh and the World Bank.

1.2 Purpose of the ESMF

The ESMF is intended to be used as a practical tool during formulation, design, implementation, and monitoring of components and sub-components of this project. This document will be followed during project preparation and implementation for ensuring environmental and social integration in planning, implementation, and monitoring of project supported activities. For ensuring good environmental and social management in the proposed LGCRR project, the ESMF will provide guidance on pre-investment works/studies (such as environmental and social screening, environmental and social assessment, environmental and social management plans, etc.), provide set of steps, processes, procedures, and mechanisms for ensuring adequate level of environmental and social consideration and integration in each investment in the project-cycle. The document describes the principles, objectives, and approaches to be followed to avoid, minimize, or mitigate adverse impacts. The ESMF will facilitate compliance with the Government of Bangladesh's policies, acts and rules as well as with the World Bank's environmental

and social standards (ESSs) of the Environmental and Social Framework (ESF), and guide to prepare and conduct the detailed ESA/IEE/ESIAs/ESMPs of the later stages of the LGCRRP as appropriate to the project components/sub-components.

1.4 Project Description

The objective of the project is to strengthen the capacity of the urban local governments' response to the COVID-19 pandemic and preparedness for future shocks. The objective captures two important time dimensions: firstly, the immediate term, characterized by the need for ULGIs to better respond to and recover from the COVID-19 pandemic and its impact on urban populations; secondly, in the medium-to-long-term, when ULGI capabilities will need to be reinforced in order to more effectively prepare for future shocks similar to COVID-19 pandemic including disease outbreaks, disasters, and climate change impacts.

Phasing and scope: The project will focus primarily on bridging the COVID-19 response gaps at the local level. In the short to medium term, it will support recovery and resilience by urgently addressing critical gaps in local health services, basic services delivery, especially those related to safety, health and wellbeing of affected communities and localities (e.g. water supply, wastewater, solid waste, rehabilitation of health and community facilities, ensuring COVID-19 safety in markets), with a strong emphasis on poorer neighborhoods (informal settlements, migrant worker housing, etc.) and disproportionately affected population groups (garment workers, women and children, differently-abled, etc.), as well as providing strong local level coordination and facilitation mechanisms for a broad range of institutional and community stakeholders working on COVID-19 response at the local level. Rehabilitation and development of essential services, as well as infrastructure and economic assets will be supported through labor intensive methods to support job creation and economic recovery. In the medium to long term, the Project will support pandemic and disaster preparedness, improving local resilience and capacity to manage crises.

Provision of block grants: The project will address critical and evolving service delivery, livelihood and employment generation needs through the provision of COVID-19 Response Grants (CRGs) to local governments. Robust fiscal transfer and monitoring systems already exist (supported through the Local Governance Support Program¹) to efficiently channel resources to urban local governments and to monitor results on the ground rapidly. A first grant will be made available soon after project effectiveness to cover emergency needs and to plan for COVID-19 response and recovery actions. The grant will be supplemented with technical assistance.

Multisectoral coordination and preparation of Local COVID Response and Recovery Plans: The proposed project will ensure complementarity with ongoing sectoral COVID-19 response interventions targeting individuals and households needs. ULGIs will establish local COVID Response Committees and prepare Local COVID Response and Recovery Plans, building on their role in providing critical physical, social and institutional infrastructure and services to meet communities' health, food, and jobs needs, but also to effectively coordinate recovery and resilience efforts. Based on the Local COVID Response and Recovery

¹ Three consecutive phases of Local Government Support Program (LGSP) have successfully established formula-based block grants (BGs) to all Union Parishads (UPs) in Bangladesh. Currently LGSP 3 (P159683), a \$300 million IPF, is ongoing supporting 4,543 Union Parishads (rural municipalities).

Plans, labor-intensive works will target low-income and most vulnerable urban households, ensuring COVID-sensitive implementation.

Timeline and adaptive learning: The project is expected to be implemented over a period of four fiscal years, starting from FY 2021-22. It will consist of three components. Procedures for components 1 and 2 will be detailed in a Project Operations Manual (POM), which will be made available to all eligible ULGIs, as well as to other national and sub-national stakeholders. A separate POM will describe procedures for component 3 (CERC). A mid-year review is planned after three grant cycles based on the results from operational audit, progress status, COVID situation and performance of ULGIs in managing the grants to assess scope and geographical coverage of the remaining grants.

Gender: The project will support women's employment opportunities as well as enhancing their voice and agency. On the employment side, the project will ensure that livelihood and employment initiatives supported through the block grants target women workers and include training and skills development for women. With regards to voice and agency, the project will facilitate women's participation in local COVID response plans and increase the availability and access to GBV service providers.

1.5.1 Project Components

Component 1: Covid-19 Response Grants (US\$275 million). Through Component 1, the Project will provide eligible and qualifying ULGIs with CRGs over a period of four fiscal years (FYs 21/22, 22/23, 23/24, and 24/25). Annual grant allocations will be disbursed on a six-monthly basis, with each eligible ULGI being potentially able to qualify for six 6-monthly grant disbursements over the project period. COVID-19 Response Grants (CRGs) will be used by qualifying ULGIs to finance activities that are intended to respond to the COVID-19 pandemic, for emergency response, relief, socioeconomic recovery, and preparedness to future disease outbreak, disasters, and climate change impacts. Qualifying ULGIs will be able to use their grants to fund a range of expenditures, grouped into four main pillars, consistent with the prioritization strategy outlined in the CRRPs: Health interventions aimed at saving lives (Pillar 1), Labor Intensive Public Works (Pillar 2), and Local economic development and preparedness to future shocks (Pillar 3 and 4).

Expenditures with potential negative social or environmental impacts including with the Activities requiring land acquisition or resettlement and Activities with significant environmental impacts, including those that significantly increase greenhouse gas emissions are included in the negative list for funding.

Component 2: Implementation and capacity building support, digital technology, and project management (US\$25 million). Through Component 2, the Project will finance activities aimed at strengthening ULGIs' medium-long term preparedness to shocks similar to COVID-19 and crisis-disaster response capacities. All ULGIs in the country will be covered by Component 2, including Dhaka North and Dhaka South City Corporations (which will receive support through this Component to strengthen their preparedness for future shocks). Support to ULGIs will also include basic capacity building inputs to ULGIs, aimed at ensuring that ULGIs are able to meet MC requirements. Support for the use and application of digital technology will cut across Component 2 activities, aimed at strengthening overall ULGI and Project performance in the immediate and medium to long terms.

Sub-component 2.1: Implementation and capacity building support (US\$ 17 million). Sub-component 2.1 will aim to assist ULGIs in: (a) implementing actions in response to the ongoing COVID-19 pandemic and its consequences; (b) strengthening their capacity to be prepared for future shocks including pandemics, disasters and climate change impacts; and (c) digital technology improvements.

Sub-component 2.2: Project management and implementation support. Through Sub-component 2.2, LGCRRP will provide resources for project management and implementation support. At the national level, the PMU will ensure overall project management; at the sub-national level, Regional Support Centers (with guidance and support from the PMU) will coordinate project activities in their respective Divisions and provide ULGIs with technical backstopping and quality assurance.

Component 3: Contingency Emergency Response Component (CERC). This CERC is included under the project in accordance with OP 10.00, paragraphs 12 and 13, for situations of urgent need of assistance. This will allow for rapid reallocation of Project proceeds in the event of a natural or man-made disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact. To trigger this component, the Government needs to declare an emergency or provide a statement of fact justifying the request for the activation of the use of emergency funding. To allocate funds to this component, the Government may request the World Bank to reallocate project funds to support response and reconstruction.

1.5.2 Project Beneficiaries

Project beneficiaries will include: (a) the residents of the eligible ULGIs, who will be expected to benefit directly from the various activities funded through CRGs. Component 1 will benefit 30.55 million residents of 329 Pourashavas and 10 City Corporations; and (b) Component 2 will benefit 329 Pourashavas and 12 City Corporations, which will be expected to become more capable of responding to health-related crises, disasters and climate shocks (benefiting 39.90 million urban residents)..

1.6 Approach and Methodology of the ESMF

The ESMF has been prepared following the standard methodology consisting of the steps listed below.

- Review of the program details and meeting/discussions with the IA and ULGIs.
- Review of the policy and regulatory requirements.
- Conduct reconnaissance field visit by groups of experts of WB and LGSP-3 team (responsible for preparing the project on behalf of LGD) and initial scoping and screening to determine the key environmental and social parameters and aspects that are likely to be impacted by the program activities.
- Collect and analyze baseline environmental and social data with the help of secondary literature review and field data collection.
- Consult with the stakeholders including beneficiary/affected communities and developing the consultation process.
- Assess the potential and likely impacts of the project activities.
- Prepare an outline of the environmental and social management issues according to the requirements of the 10 ESSs of the ESF.
- Collecting E&S related basic information from selected Pourashavas through sending checklists electronically.

Chapter 2: LEGAL, REGULATORY AND POLICY FRAMEWORK

2.1 National Environmental and Social Policy, Legal and Regulatory Framework

Key applicable national policies, strategies, plans, acts, rules and regulations laid out by the Government of Bangladesh in the following list. However, their key provisions, purpose, and relevance to the LGCRPP pertaining to the environment and social aspects are briefly discussed in Annex 5.

- Bangladesh Environmental Conservation Act (ECA), 1995; Amendments in 2010
- Bangladesh Environmental Conservation Rules (ECR), 1997
- Bangladesh Environment Court Act, 2010
- National Environmental Management Action Plan (NEMAP), 1995
- National Environmental Policy, 1992
- The Noise Pollution Control Rules, 2006
- Bangladesh Biosafety Guideline 2007
- Bangladesh Climate Change Strategy and Action Plan (BCCSAP), 2009
- National Adaptation Program of Action (NAPA), 2005
- Bangladesh Medical Waste Management and Processing Rules 2008
- Bangladesh Labor Act, 2006, (as amended 2018)
- Bangladesh Labor Rules, 2015
- Bangladesh Child Labor Mitigation Policy, 2010
- Bangladesh National Building Code, 2006
- Bangladesh Wildlife (Protection and Preservation) Act 2012
- The Communicable Diseases (Prevention, Control and Eradication) Act, 2018
- Acquisition and Requisition of Immovable Property Act, 2017
- CHT (Land Acquisition) Regulation, 1958 (as amended 2019)
- The East Bengal State Acquisition and Tenancy Act 1950 (Act XV of 1951)
- National Agriculture Policy, 1999
- The Water Supply and Sanitation Act (1996)
- National Land Use Policy, 2001
- National Livestock Development Policy, 2007
- National Policy for Safe Water Supply and Sanitation, 1998
- Embankment and Drainage Act, 1952
- National Water Management Plan, 2001 (Approved in 2004)
- Bangladesh Water Act, 2013
- National Water Policy, 1999
- The Ground Water Management Ordinance (1985)
- Road Transport Act, 2018
- The Antiquities Act (1968)
- National Fisheries Policy, 1998
- The Protection and Conservation of Fish Act (1950)
- Protection and Conservation of Fish Rules (1985)

Other than the above, due to ongoing COVID-19 pandemic, World Health Organization (WHO) and Directorate General of Health Services (DGHS), under the Ministry of Health and Family Welfare, provided guidelines for infection prevention and control. The government has incorporated the life-threatening novel corona virus (COVID-19) in 'The Communicable Diseases (Prevention, Control and Eradication) Act, 2018'. With the notification of the gazette the government has a legal basis to take action against the people not following the government's direction that relates to COVID 19. Health and safety issues relevant to COVID-19 should be addressed with reference to ILO Occupational Safety and Health Convention, 1981 (No. 155), ILO Occupational Health Services Convention, 1985 (No. 161), ILO Safety and Health in Construction Convention, 1988 (No. 167), WHO International Health Regulations, 2005, WHO Emergency Response Framework, 2017. Female labor, vulnerable groups' labor (e.g. persons with disabilities) are covered under this domestic legislation.

2.2 Applicable International Treaties Signed by the GoB

Bangladesh has signed most international treaties, conventions and protocols on environment, pollution control, bio-diversity conservation and climate change, including the Ramsar Convention, the Bonn Convention on Migratory Birds, the Rio de Janeiro Convention on Biodiversity Conservation, and the Kyoto Protocol on Climate Change.

- Protection of birds (Paris)
- Ramsar Convention
- Protocol on Waterfowl Habitat
- World Cultural and Natural Heritage (Paris)
- Bonn Convention
- Prevention and Control of Occupational hazards
- Occupational hazards due to air pollution, noise & vibration (Geneva)
- Occupational safety and health in working environment (Geneva)
- Occupational Health services
- Convention on oil pollution damage (Brussels)
- Civil liability on transport of dangerous goods (Geneva)
- Safety in use of chemicals during work
- Convention on oil pollution
- UN framework convention on climate change (Rio de Janeiro)
- Convention on Biological Diversity (Rio de Janeiro)
- International Convention on Climate Changes (Kyoto Protocol)
- Indigenous and Tribal Populations Convention
- ILO Convention No 29 on Forced Labor
- ILO Convention no. 182 on Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor

- Migrant Workers (Supplementary Provisions) Convention
- Convention on the Elimination of All Forms of Discrimination Against Women

2.3 World Bank's Environmental and Social Framework

Since October 2018, all World Bank funded Investment Project Financing (IPF) are required to follow the **Environmental and Social Framework (ESF) consisting of ten (10) Environment and Social Standards (ESSs)**. These ESSs set out their requirement for the LGCRRP implementing agencies relating to the identification and assessment of environmental and social risks and impacts associated with any project. The ESSs support the IAs in achieving good international practice relating to environmental and social sustainability, assist them in fulfilling their national and international environmental and social obligations, enhance transparency and accountability and ensure sustainable development outcome through ongoing stakeholder engagement.

The ESF sets out its commitment to sustainable development, through Bank Policy and a set of Environmental and Social Standards that are designed to support LGCRRP, with the aim of ending extreme poverty and promoting shared prosperity. The part of Bank's Environmental and Social Policy for investment project financing sets out the requirement that the World Bank must follow regarding projects it supports through Investment Project Financing. Table 2.1 summarizes the ESS requirements and their relevance to the LGCRRP components:

Table 2.1 WB ESS requirements and relevance to the LGCRRP

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project/project
World Bank Environment and Social Framework (ESF) for Investment Project Financing	It sets out the mandatory requirements of the Bank in relation to the projects it supports through Investment Project Financing. The types of E&S risk and impacts that should be considered in the environmental and social assessment. The required E&S management plan as well as the use and strengthening of the Borrower's environmental and social framework for the assessment, development and implementation of World Bank financed projects where appropriate.	Applicable to the LGCRRP and its all activities
ESS-1 Assessment and Management of Environmental and Social Risks and Impacts	Identify, assess, evaluate, and manage environment and social risks and impacts in a manner consistent with the ESF. Adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities	Relevant. ESMF has been prepared. Detailed IEE/ESIA and ESMP will be prepared in addition to this ESMF, where required.

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project/project
ESS-2 Labor-and-Working-Conditions	Promote safety and health at work. Promote the fair treatment, non-discrimination, and equal opportunity of project workers. Protect project workers, with particular emphasis on vulnerable workers. Prevent the use of all forms of forced labor and child labor. Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. Provide project workers with accessible means to raise workplace concerns.	Relevant. A separate LMP has been prepared, in addition to other site-specific management plans need to be prepared during construction phase.
ESS-3 Resource-Efficiency-and-Pollution-Prevention-and-Management	Promote the sustainable use of resources, including energy, water, and raw materials. Avoid or minimize adverse impacts on human health and the environment caused by pollution from project activities. Avoid or minimize project-related emissions of short and long-lived climate pollutants/greenhouse gases. Avoid or minimize generation of hazardous and non-hazardous waste. Minimize and manage the risks and impacts associated with pesticide use. Requires technically and financially feasible measures to improve efficient consumption of energy, water, and raw materials, and introduces specific requirements for water efficiency where a project has high water demand.	Relevant. With respect to Resource Efficiency, the site specific ESMP will identify feasible measures for efficient (a) energy use; (b) water usage and management to minimize water usage during construction/ renovation, conservation
ESS-4 Community-Health-and-Safety	Anticipate or avoid adverse impacts on the health and safety of project-affected communities during project life cycle from routine and non-routine circumstances. Promote quality, safety, and climate change considerations in infrastructure design and construction, including dams. Avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. Have in place effective measures to address emergency events. Ensure that safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.	Relevant. In the LGCRP there is likely to be i) use of vibratory equipment, construction debris handling and disposal etc. during construction; ii) high likelihood of direct exposure to increased construction related traffic and equipment especially on campus traversing settlement area with limited carriageway/roadway width, and sensitive receptors such as schools, religious place, health center/hospitals; iii) high dust levels, high noise and emission level in construction sites; iv) expansion of medical service and those operation may cause potential waste generation; and v) influx of skilled migrant workers

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project/project
		could potentially cause local discomfort or potential conflicts with local people and pose GBV/SEA/SH risk. Site specific management plans will be developed following the guideline of ESMF.
ESS-5 Land-Acquisition- Restrictions-on- Land-Use-and- Involuntary- Resettlement	Avoid or minimize involuntary resettlement by exploring project design alternatives. Avoid forced eviction. Mitigate unavoidable adverse impacts from land acquisition or restrictions on land use by providing compensation at replacement cost and assisting displaced persons in their efforts to improve, or at least restore, livelihoods and living standards to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. Improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure. Conceive and execute resettlement activities as sustainable development programs.	Project will not involve in any kind of land acquisition/requisition. So, no separate RAP/RPF is required for LGCRRP.
ESS-6 Biodiversity- Conservation	Protect and conserve biodiversity and habitats. Apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources.	Not relevant since the project location is not expected to affect any biodiversity or habitat.
ESS-7 Indigenous- Peoples	Ensure that the development process fosters full respect for affected parties' human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods. Promote sustainable development benefits and opportunities in a manner that is accessible, culturally appropriate and inclusive. Improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with affected parties. Obtain	Not relevant to the LGCRRP, given that the project will be implemented in urban (City Corporation and Pouroshovas) setting, it is unlikely that small ethnic minorities present in the project areas meeting the criteria mentioned in ESS7 will be affected.

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project/project
	the Free, Prior, and Informed Consent (FPIC) of affected parties in three circumstances. Recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.	
ESS-8 Cultural-Heritage	Protect cultural heritage from the adverse impacts of project activities and support its preservation. Address cultural heritage as an integral aspect of sustainable development. Promote meaningful consultation with stakeholders regarding cultural heritage. Promote the equitable sharing of benefits from the use of cultural heritage.	This project is unlikely to adversely affect any cultural heritage. However, the ESMF includes a Chance Finds Procedures to illustrate the course of action to be taken in case any culturally significant objects/practices are discovered
ESS-9 Financial-Intermediaries	Sets out how Financial Intermediaries (FI) will assess and manage environmental and social risks and impacts associated with the subprojects it finances. Promote good environmental and social management practices in the subprojects the FI finance. Promote good environmental and sound human resources management within the FI.	Not relevant as there is no financial intermediary involved.
ESS-10 Stakeholder-Engagement-and-Information-Disclosure	Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them. Assess stakeholder interest and support for the project and enable stakeholders' views to be taken into account in project design. Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle. Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.	A separate SEP has been prepared to address ESS10.
Environmental and Social Directive for Investment Project Financing	This Directive applies to the Bank and sets out the mandatory requirements for the implementation of the Environmental and	Applies to Bank in addressing E&S aspects of this project

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project/project
	Social Policy for Investment Project Financing (IPF).	
Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups	This Directive establishes directions for Bank staff regarding due diligence obligations relating to the identification of, and mitigation of risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable	Applies to Bank in addressing E&S risks and impacts on disadvantaged and vulnerable persons or groups that are identified in this project area.
World Bank's Guidance note on managing the risks of adverse impacts on communities from temporary project induced labor influx, 2016	The document provides guidelines to address issues and risks arising from influx of migrant labor leading to gender-based violence, forced labor etc. especially focusing on Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) in civil works sites.	Applicable to all activities of project, as civil works are envisaged in the sub-projects by ULGIs. However, risks of GBV/SEA/SH will be low due to the use of local workers.
ESF/Safeguards Interim Note: Covid-19 considerations in construction/civil works projects	This note was issued on April 7, 2020 and includes links to the latest guidance as of this date (e.g. from WHO). Given the COVID-19 situation is rapidly evolving, when using this note it is important to check whether any updates to these external resources have been issued. This interim note is intended to provide guidance to teams on how to support Borrowers in addressing key issues associated with COVID-19 and consolidates the advice that has already been provided over the past month. As such, it should be used in place of other guidance that has been provided to date.	Applicable to all activities of project during COVID-19 pandemic.
General EHS Guidelines, April 2007, IFC	The General EHS Guidelines contain information on cross-cutting environmental, health, and safety issues potentially applicable to all industry sectors	Yes
EHS Guidelines for Construction Materials Extraction, April 2007, IFC	The EHS Guidelines contain the performance levels and measures that are considered to construction materials extraction activities such as aggregates, limestone, slates, sand, gravel, clay, gypsum, feldspar, silica sands, and quartzite	Yes

2.4 Gap Analysis of World Bank Requirements and National Laws

A gap analysis between WB's ESSs and GoB Regulations was conducted as part of the E&S capacity assessment of the LGCRRP. The results of the gap analysis indicated that the E&S risk assessment and management system for development projects in Bangladesh is open-ended but just like other country's EIA systems, does not cover all the World Bank ESF's E&S Standards. The ECA/ECR does not even define the scope of the EIA study (or the IEE), leaving it to the EIA to determine the scope through initial assessment/screening. The coverage of the EIA study therefore would depend on the expertise of the EIA team or the DoE reviewers. There is no assurance that each E&S Standard (1-8 and 10) are considered in the EIA study and the formulation of the ESMP. Although the EIA is heavy towards the environmental aspects, more and more social issues are incorporated in the assessment. Moreover, the practice under normal circumstances does not include labor management issues. Another critical gap pertains to lack of provisions for requiring the preparation of project-specific E&S management plans. The eminent domain land acquisition system for example does not require the preparation of RAP. The projects are also not required to formulate their own Labor Management Procedures/Plans. Given the gaps, this ESMF will follow the most stringent standards and requirement. Table 2.2 below has given an overview of the gaps between GoB laws and WB's ESSs and steps suggested to address those gaps.

Table 2.2: Gaps between GoB laws and World Bank ESSs those applicable to the LGCRRP

WB ESF Standard	Gaps	Gap Minimization
ESS1: Assessment and Management of Environmental and Social Impacts and Risks	(i) IEE/ESIA study screening and scoping do not guarantee coverage of all ESS standards in the assessment. (ii) The stakeholder engagement during the conduct of the IEE/ESIA is limited and the IEE/ESIA report is not disclosed. (iii) The IEE/ESIA system in Bangladesh does not require analysis of alternatives.	ESMF has suggested to follow the ESS1 requirements, given in the relevant sections of Environmental Management Procedures. In case, DoE rules/regulations do not cover the ESS requirements, relevant clauses should be added in the Financial Agreements and Project Appraisal Document to follow the more stringent E&S requirements according to WB ESF.
ESS2: Labor and Working Conditions	(i) The Labor Act does not specifically require that development be assessed and reviewed in terms of labor and working conditions including OHS requirements before approval. (ii) The Labor Act does not require development projects to prepare Labor Management Plans/Procedure or OHS Plan.	A separate LMP has been prepared. Guideline for developing Site Specific Labor Management plans including OHS has been included in the LMP.
ESS3: Resource Efficiency and Pollution Prevention and Management	Existing energy and water conservation policies, laws and regulations do not require development projects to assess resource efficiency issues and incorporate	ESMP to be developed for LGCRRP components will address this issue, and incorporate mitigation measures for efficient use of water resources.

WB ESF Standard	Gaps	Gap Minimization
	resource efficiency measures in their E&S risk management plans.	
ESS4: Community Health and Safety	Covered under IEE/ESIA but the systems do not provide clear requirements for the development project and implementation. Health issues are within the purview of MoHFW, which would be engaged in COVID-19 health management activities by the ULGIs under the LGCRRP.	Guideline for Community Health Safety has been addressed in this ESMF.
ESS10: Stakeholder Engagement and Information Disclosure	The ECA/ECR does not specifically require consultation but the IEE/ESIA guidelines issued by DOE and other agencies recommends public consultations during scoping and the preparation of the IEE/ESIA. There is also no provision for any stakeholder engagements during project implementation	A separate SEP has been prepared. In addition, guideline for stakeholder's engagement provided in this ESMF will be followed.

2.5 Application of GoB Policies, Acts and Rules on LGCRRP components and their Classification

The legislations relevant for environmental assessment for LGCRRP components are the Environmental Conservation Act 1995 (ECA'95) and the Environmental Conservation Rules 1997 (ECR'97). In order to set an illustrative directive for abiding by the act, Bangladesh Government through the Environmental Conservation Rules '1997 and its subsequent amendments, as specified in rule 7(2), present a categorization of all the potential industrial interventions or projects into four distinct types- Green, Orange A, Orange B and Red, considering the site of the interventions and impact on the environment. The procedure and required documents for obtaining environmental clearance in favor of each category have also been presented by the DoE. As part of a government entity, LGD and PMU of the LGCRRP is obliged to abide by all these acts and rules, in addition of other GOB acts, rules or guidelines.

As per ECR'97, most the components/sub-components and associated activities are likely to fall ranging under either Orange A or Orange B as has no such significant impact on the surrounding environmental and social components, likely to have localized and reversible environmental and social impacts demands IEE, and only a few demands advance level EA like ESIA. It is suggested that the project should conduct screening for all activities/schemes at the initial stage and based on screening result, and if recommended by DoE, further IEE or ESIA should be carried out for specified activities.

It is the responsibility of the PMU/LGD at the national level and PIU/ULGIs (grantees) at the local level to conduct Screening, IEE and ESIA (if required) of the project activities, the responsibility to review IEE and ESIA for the purpose of issuing Environmental Clearance Certificate rests on DoE. The Department of Environment (DoE), the technical arm of the Ministry of Environment, Forests and Climate Change (MoEFCC) is the regulatory body and the enforcement agency of all environmental related activities. Like all other projects, this project also needs to meet the requirement of the DoE. ***The procedures for "Orange A and Orange B" Category include submission of:***

- An Initial Environmental Examination (IEE), and

-
- An Environmental and Social Impact Assessment (ESIA), if prescribed by DoE, and
 - An Environmental and Social Management Plan (ESMP)

Environment clearance must be obtained by the respective implementing agency or project proponent (private sector) from Department of Environment (DoE). The environmental clearance procedure for Orange-A and Orange-B Category projects can be summarized as follows:

Application to DoE→Obtaining Site Clearance→Applying for Environmental Clearance→Obtaining Environmental Clearance→Clearance Subject to Annual Renewal.

Chapter 3: POTENTIAL KEY ENVIRONMENTAL AND SOCIAL RISKS

3.1 Impact Assessment and Prediction

A preliminary categorization of the project components/sub-components based on their environmental assessment requirement is given in Table 3.1 following the new WB ESF/10 ESSs.

Table 3.1: Categorization of LGCRRP Activities Based on Key Predicted Impacts

A. Component 1: Covid-19 Response Grants, Sub-components: N/A

Pillar	Purpose	Indicative activities/investments	Predicted Impacts
Pillar 1: Saving lives To be coordinated with other stakeholders (e.g. public health departments)	(a) Stopping COVID transmission;	Provision of community hand washing stations, climate resilient public toilets; sanitization, cleaning, and masks in municipality operated markets, burial grounds and crematoriums, schools, and public offices	- Impact on health and safety of the workers and communities - Impact on, women and disadvantaged groups - Impact on waste generation, management and disposal
	(b) ensuring health service delivery;	Community awareness programs on COVID protocols, vaccines, climate change and health risks	- Impact on health and safety of the workers and communities - Impact on women and disadvantaged groups - Impact on disposing accidental chemical and medical waste
	(c) protecting vulnerable households' access to preventive and essential health services	Improved access and provision of climate resilient municipality operated health clinics, support for vaccine distribution and community counselling including GBV services especially in low-income areas, slums and high-risk areas exposed to disease outbreak and climate change impacts	- Impact on health and safety of the workers and communities - Impact on women and disadvantaged groups - Impact on household waste generation and waste management

Pillar	Purpose	Indicative activities/investments	Predicted Impacts
Pillar 2: Protecting the poor and vulnerable	Provision of essential services & paid employment for poor and vulnerable	Operations & maintenance schemes to ensure essential public service delivery/ infrastructure/-facilities (e.g. water supply, sanitation, drainage, public parks, cleaning, and streetlights), especially in low income, slums, and high-risk areas exposed to disease outbreaks/ climate change impacts. ² Labor-intensive public works (LIPWs) for repair and construction schemes ensuring that public works are pro-poor and inclusive of gender. The identification, registration and verification of beneficiaries for LIPWs will be coordinated with relevant national departments. Daily wages will be based on national and local rates.	<ul style="list-style-type: none"> - Impact on land - Impact on air, water - Impact on homestead/local biodiversity - Impact on livelihoods - Impact on health and safety of the workers and communities - Impact on women and disadvantaged groups - Impacts on women mobility - Risk of GBV - Increase of vulnerability - Climate risk including flooding, and drainage congestion, green house gages emission, - Impact on waste generation, management and disposal.
Pillar 3: Ensuring sustainable business growth & job creation	Local economic development and recovery from COVID-19 impacts	Upgrading/rehabilitating to climate/ health resilient standards - wet/informal food markets, local industrial parks, special economic zones including access infrastructure such as separate toilets for women, and child-care facilities ³ Information Communication Technology (ICT) network and digital technology (for improving ULGI functioning, surveillance of climate/health risks)	<ul style="list-style-type: none"> - Impact on land - Impact on air, water - Impact on livelihoods - Impact on health and safety of the workers and communities - Impact on waste generation, management, and disposal
Pillar 4: Strengthening policies, institutions and investments	<i>Institutional, Disease outbreak, Disaster/Climate Preparedness</i>	Municipal revenue generation and collection improvements. Measures to improve emergency response, including actions identified in local Preparedness Plans. Climate and flood proofing municipality operated health clinics and schools, use of renewable energy (solar/ wind) to manage power disruptions.	<ul style="list-style-type: none"> - Potential risks of discrimination to disadvantaged and vulnerable communities, groups and individuals including women - Medical and e-waste generation
Investment and activity servicing	Use of consultants and	Consultant services, incremental operating costs	N/A

² New infrastructure and facilities or any upgrading and rehabilitation will consider: (i) disaster and climate risks to build resilience from disasters and climate impacts; and (ii) inclusive development targeting low-income areas and high risk communities to develop safe spaces and facilities for women, children and disable population.

³ Ibid.

Pillar	Purpose	Indicative activities/investments	Predicted Impacts
costs (up to a maximum of 5% of CRG allocation)	other inputs for planning, design, costing and supervision of interventions		

B. Component 2: Implementation and capacity building support, digital technology and project management, Sub-components: N/A

Sub-components	Activities/Specific tasks	Predicted Impacts
Sub-component 2.1. Support for strengthening ULGI COVID-19 response, recovery and resilience	COVID-19 response & recovery support to ULGIs: <ul style="list-style-type: none"> • Compliance with Minimum Conditions • COVID-19 response and recovery planning • health interventions • Labor Intensive Public Work planning, implementation and supervision • Infrastructure & service delivery support (engineering) • project cycle and project management (project planning, budgeting, management, safeguards, procurement, M&E, coordination and reporting) • Digitalization of payments systems (for public works) • Health information technologies/web-portal 	<ul style="list-style-type: none"> - Impact on land - Impact on air, water - Impact on homestead/local biodiversity - Impact on livelihoods - Impact on health and safety of the workers and communities - Impact on women and disadvantaged groups - Impacts on women mobility - Risk of GBV - Increase of vulnerability - Climate risk including flooding, and drainage congestion Impact on waste generation, management and disposal -
	Medium to-long term support to strengthen resilience: <ul style="list-style-type: none"> • own-source revenues • Pandemic and disaster preparedness (risk mapping, mitigation planning) • Emergency preparedness and response • Digitalization of property tax administration, own-source revenue management • Risk mapping, digitalization of contingency and DRM plans 	N/A
Sub-component 2.2. Project management and implementation support	National: <ul style="list-style-type: none"> • Coordination, oversight and supervision • ULGI compliance assessments and audits • Monitoring & evaluation • Financial & narrative reporting • Environmental & social management • Procurement 	N/A

Sub-components	Activities/Specific tasks	Predicted Impacts
	<ul style="list-style-type: none"> MIS for core management (FM, planning, etc.) 	
	Sub-national: <ul style="list-style-type: none"> Coordination and liaison Backstopping and support in safeguard and fiduciary compliance, M&E, reporting, MIS 	N/A
	Monitoring and Evaluation (M&E)	N/A

C. Component 3: Contingency Emergency Response Component (CERC), Sub-components: N/A

Sub-components	Activities/Specific tasks	Predicted Impacts
N/A	Not defined, Zero allocation	If CERC is triggered, this ESMF will be updated for management of potential impacts of CERC activities.

3.1.1 Projected Environmental and Social Impacts Related to Project Siting

Site Specific Land Cover and Land Use Changes

Expansion, construction, rehabilitation and refurbishment of facilities including civil works for renovation, rehabilitation, and refurbishment of existing facilities including markets, sanitation facilities, health centers, roads, drainage and waste management, etc. will be limited within existing available land at the local level, and therefore, potential E&S impacts will be only construction related.

Loss of trees

Siting of potential infrastructures by ULGIs may require cutting of trees and removal of natural/homestead/roadside vegetation.

Drainage congestion and water logging

Potential infrastructure construction activities can cause drainage congestion and water logging at the local area, if not properly considered the local drainage of runoff.

Impacts on Vulnerable and disadvantage groups/communities/individuals

The LGCRRP have been designed to provide a holistic support to improve skills and livelihoods of disadvantaged people, youth, women, tribal people, unskilled workers, vulnerable communities, etc. It aims to increase contribution to the economy, poverty reduction, and environmental sustainability through a set of targeted capacity building activities. Its activities targeting disadvantage groups, women etc will create employment through the engagement in labor intensive public works (LIPWs). However, these activities would also have risk of discrimination to the disadvantaged groups due to lack of social policies/standards that ensure equal representation.

Given that the project will be implemented in urban (City Corporation and Paurashavas) setting, the small ethnic minority communities present in some of the project areas do not meet the criteria mentioned in ESS7. The tribal peoples present in some of the target ULGIs are mainstreamed with the urban population accessing all public services equally.

3.1.2 Projected Environmental and Social Impacts during Project Implementation

Air Pollution. Civil works of new and existing facilities may generate emissions from excavation equipment, other machinery and construction traffic. The emissions may also include greenhouse gases (GHGs) from engine fuel combustion (exhaust emissions) and evaporation and leaks from vehicles (fugitive emissions) and emissions. The emissions from construction activities will deteriorate the ambient air quality and affect the public health.

Noise Pollution. Noise will be produced by vehicular movement, excavation machinery, concrete mixing, and other construction activities. The schools, religious places and crowded market areas adjacent to the construction sites are particularly vulnerable to the increased noise levels.

Water Pollution. During the construction/renovation activities ponds/canals/water streams-rivers can potentially cause some localized increase in water turbidity due to poor waste management. However, this increase in turbidity is not likely to have any significant impact on overall water quality and the aquatic fauna primarily because of its temporary and localized nature. The construction camps and other site facilities such as offices and warehouses will also generate considerable quantities of waste effluents. Other possible causes of land or water contamination include accidental leakage or spillage of fuels, oils, and other chemicals, and waste effluents released from construction sites. These effluents can potentially contaminate the drinking water sources of the area and can also be harmful for the natural vegetation, cultivation fields, water bodies, and aquatic flora and fauna.

Impacts of Land Filling (at new construction site). Potential impacts that can arise from the proposed construction/ civil works at new sites may involve land filling quarrying earth from elsewhere. Land filling activity must avoid collection of topsoil from crop fields, hills cuttings and illegal sand mining from riverbeds.

Soil Contamination. Much like water pollution discussed above, soils in the construction/ refurbish/ expansion area and nearby lands that are used for agriculture will be prone to pollution from the construction activities, construction yards, workers camps and other construction areas. Fuel and chemical material storage sites and their handling are also the potential sources for soil and water pollution. Improper siting, storage and handling of fuels, lubricants, chemicals materials, and potential spills from these will severely impact the soil and water quality and cause safety and health hazards.

Generation of Solid Waste (Including Medical Wastes). Solid waste generated during the construction phase will include excess construction materials such as sand and soil, faulty/damaged parts, metal scraps, cardboard boxes and containers, and cotton swabs from workshops, and domestic solid waste from construction offices and camps. In addition to the above, small quantities of chemical waste will also be generated mainly from the vehicle maintenance activities (liquid fuels; lubricants, hydraulic oils; chemicals, such as anti-freeze; contaminated soil; spillage control materials used to absorb oil and chemical spillages; machine/engine filter cartridges; oily rags, spent filters, contaminated soil, and others). Besides, operation of medical camp, health centers and laboratories would also generate medical wastes. It is imperative

that such waste is responsibly disposed to avoid adverse environmental, human health and aesthetic impacts. Inappropriate disposal of these wastes can lead to soil and water contamination as well as health hazards for the local communities, livestock, and aquatic as well as terrestrial fauna.

Site Clearance and Restoration. After the completion of the construction activities, the left-over construction material, debris, spoils, scraps and other wastes from workshops, and camp sites can potentially create hindrance and encumbrance for the local communities in addition to blocking natural drainage and or irrigation channels.

Occupational Health and Safety. Generally, the construction/reconstruction activities may pose health hazards to the workers at site during use of chemicals and fumes, lifting and handling of heavy equipment, operating machinery, and electrical equipment, working near water or at height and more. The project will need fuels, oils, and asphalt during the construction in new campus for model diploma institutes. Inappropriate handling or accidental spillage/leakage of these substances can potentially lead to health hazards for the construction workers as well as the local community.

Similar to the above, various construction/renovation/expansion of facilities may cause safety issues including physical injuries and accidental death. This may be increased in absence of proper training of unskilled workers to be engaged. Local community will also be vulnerable to accidental cases starting from minor injuries for careless disposal of chemical and gaseous materials to death for example movement of the heavy machineries and equipment.

Similarly, Covid-19 contamination will be an important risk associated with the workers at the construction/renovation/expansion sites. Govt. imposed Covid-19 health safety protocol for workers and WHO's Covid 19 safety guidelines should be followed to avoid any risk of spreading the virus among associated families/communities.

Impacts on Livelihoods and Income. The LGCRRP will have positive impacts on enhancing technical skills and livelihoods of disadvantaged people, youth, women, labours and unskilled workers, vulnerable communities, etc. It will contribute to their income generation and poverty reduction. LGCRRP's activities targeting disadvantage groups, women, and youth will create employment and enhance job opportunities.

Impact on labor, working Conditions and labor risks, including risks of child labor and forced labor. The proposed activities will entail employment of a significant number of people especially during construction/reconstruction/expansion of facilities and labor intensive public works schemes. The majority of labor will be locally hired, with the exception of skilled workers who may not be found in the project areas. Potential risks for the hired skilled and non-skilled workers especially during construction period includes health hazards, poor living condition, accidental hazards risks, etc. Similarly, hiring labor from external area may cause social risk on the local communities includes gender-based violence, price hiking of daily used products/foods, etc. Risks are also associated in-terms of hiring child labors or forced labors, and due to presence of some proposed ULGIs in the border districts, considerable risk is associated to the labor trafficking. However, a separate LMP has been prepared to minimize the risk associated with labor influx.

Impact on creating social discrimination for the most disadvantaged groups, vulnerable women/disabled persons. Project has included various activities targeted to uplift the capacity and skill of the disadvantaged groups of the society including vulnerable women, and disabled persons. Promotion of

entrepreneurs might have negative impact if not designed considering socially inclusive policies. As most of the activities will be decided during project implementation period, there is likelihood of such impacts on most disadvantaged and vulnerable groups, if not actively monitored.

3.1.3 Projected Environmental and Social Impacts during Post Project operational Period

Loss of Local Vegetation. Construction of buildings and expansion/renovation of other infrastructures/facilities would increase human access in the existing facilities, which may lead to loss of more vegetation (herbs, shrubs and trees) at the surroundings due to human footprint and have potential impact on local wildlife biodiversity. In such cases of potential impact on plants and wildlife, demands detail baseline survey and implement appropriate natural habitat management activities by the authority.

Generation of Medical Waste, Solid Waste and Chemical/Electronic Waste. Solid waste will be generated from during regular operation and maintenance activities of the constructed/renovated infrastructures. Chemical waste will also be generated from different activities, while e-waste may be generated under the digital management. Besides, medical waste would also be generated from the established medical camp and health centers. These wastes if not appropriately disposed of has a potential to contaminate soil and water resources, thus would affect community's health as well as natural habitat. Standard lab and health safety protocol should be followed (e.g. WHO's Laboratory and COVID-19 Safety Guidelines) during operation period.

Noise Generation. During operation, noise levels along the proposed public works will be increased due to the higher traffic volume and mass people gathering. Traffic noise will be a significant nuisance to the sensitive receptors such as schools and religious places located very close to the roads and also to the children and aged persons.

Water Pollution and Drainage. Generally paved road increases the amount of impermeable surface area, which increases the rate of surface water runoff in the locality. During the operation phase, some localized increase in turbidity may take place during any maintenance works of the constructed/renovated sites. Similarly, the maintenance works can also generate a limited quantity of waste effluents.

Impacts on Local Livelihoods. While effort will be exerted for livelihood improvement of the local targeted communities, yet some of the project activities may have reversible and mitigable impacts on them. The probable impacts on income and livelihoods are minor since project will have no involuntary displacement. However, there might be some informal settlers living in the govt. lands during expansion/rehabilitation works. In such cases, respective ULGI will compensate the informal settlers through their own arrangement.

Table 3.2: Summary of Projected Environmental and Social Impacts and their Significance (ESS Risk)

Potential Impacts	Duration of Impact	Spatial Extent	Reversible	Likelihood	Magnitude	Sensitivity	Significance Prior to Mitigation	Significance after Mitigation
Impacts related to project siting								
Land cover and land use changes	Short term	Local	No	Certain	Moderate	Moderate	Moderate negative	Low negative
Loss of trees	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Drainage congestion and water logging	Short term	Local but beyond project footprint	Yes	Likely	Moderate	Mild	Moderate negative	None
Impacts on Vulnerable and disadvantage	Short term	Local	No	Likely	Moderate	Moderate	Moderate negative	None
Impacts during project implementation phase								
Air pollution	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Noise	Short term	Local	Yes	Likely	Moderate	Moderate	Moderate negative	None
Water pollution	Short term	Local but beyond project footprint	Yes	Certain	Moderate	Moderate	Moderate negative	None
Land Filling	Short term	Local but beyond project footprint	No	Certain	Low	Moderate	Moderate negative	None
Soil contamination	Short term	Local	Yes	Certain	Moderate	Mild	Moderate negative	None
Solid wastes and hazardous wastes	Short term	Local	Yes	Certain	Moderate	Mild	Moderate negative	None
Site clearance and restoration	Short term	Local	Yes	Certain	Moderate	Mild	Moderate negative	None
Occupational health and safety	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Livelihoods and Income	Short term	Local but beyond project footprint	Yes	Certain	Moderate	Moderate	Moderate Positive	Substantial Positive

Potential Impacts	Duration of Impact	Spatial Extent	Reversible	Likelihood	Magnitude	Sensitivity	Significance Prior to Mitigation	Significance after Mitigation
Labor Impacts and risks of child labor, forced labor	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Social discrimination	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Impacts during post project operational period								
Loss of Vegetation	Short term	Local	No	Certain	Moderate	Moderate	Moderate negative	None
Generation of Medical Waste, Solid Waste and Chemical Waste	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Noise generation	Short term	Local	Yes	Likely	Low	Mild	Moderate negative	None
Water pollution and drainage	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Impacts on local livelihoods	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate positive	Substantial positive

Chapter 4: ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

4.1 General Principle

Due to the nature of some of the proposed project activities under LGCRRP and their potential environmental and social impacts, the project falls under 'Orange A or Orange B' category according to ECR, 1997 and also rated as 'Moderate' as per the World Bank E&S risk classification, which requires initial E&S screening, in some cases detail IEE, and/or ESIA and execution of environmental and social management plans. Therefore, the ESMF is prepared based on the following principles that can lead the planning and implementation of the project activities.

- The PMU/LGD at the national level and PIU/ULGIs at the local level of LGCRRP is responsible for the compliance with national policies, regulations, and World Bank ESSs and Guidelines, as mentioned in this ESMF report. The ESMF will serve as the basis for ensuring E&S compliance.
- PMU/LGCRRP is responsible for obtaining environmental clearance from DoE, local government agencies and World Bank as required, PMU will coordinate with the PIU/ULGIs in the process.
- IEE, ESIA and ESMP need to be prepared for activities as determined by DoE. In case, requirements of DoE's ESIA guideline differs from those of WB ESF, the more stringent standards and requirements will apply.
- Planning and design of the any additional activities should ensure minimal assessment of cumulative impacts.
- Environmentally sensitive areas, cultural heritage sites, restricted or disputed lands (if identified during project implementation) should be handled with appropriate mitigation hierarchy including compensation measures during implementation following standard procedures applicable for such sites. In case of cultural heritage sites identified during civil works, securing the area, informing IA, decide on preservation method as per expert opinion and keep the find secret if it is for the interest of the find.
- Participation of stakeholders (especially local communities) should be ensured by PIU/ULGIs in planning, implementation, and monitoring of sub-project activities.
- PIU/ULGIs and PMU/LGCRRP will ensure appropriate institutional set up for implementing environmental and social management plans and inter-agency coordination. PIU/ULGIs also ensure that bidding documents for construction contractors have specific clauses to ensure implementation of ESMPs, as required.
- Contractors to be engaged in construction/renovation/expansion/repair and maintenance workers under the project should be provided with First Aid Kits at camp/work sites with adequate drinking water and sanitation facilities. Worker's/crew's health and safety measures shall be ensured and use of personal protective equipment shall be required.
- PIU/ULGIs at the local level and PMU/LGCRRP at the national level will inform project stakeholders about project interventions and its potential impacts on the surrounding environmental and social elements.
- In case of triggering the contingent emergency support Component (CERC), PMU/LGCRRP-LGD will update the ESMF to cover the activities supported under the CERC. A list of Positive and Negative activities for CERC component is given in Annex 6.

Subproject activities with the following environmental and social attributes will not be eligible for implementation under this project:

- E&S impacts identified in IEE/ESIA categorize the project to substantial or high risk (according to ESF).
- Requiring land acquisition, involuntary physical displacement, or result in loss of livelihoods of peoples.
- Associate adverse impacts on the small ethnic communities with indigenous status as per the World Bank ESS7.
- Associate significant environmental impacts, including those that significantly increase greenhouse gas emissions and impact of natural habitats and biodiversity.

4.2 Project Implementation Arrangement

The Local Government Division (LGD) in the Ministry of Local Government, Rural Development and Cooperatives (MLGRD&C) will be responsible for project implementation. LGD will establish a Project Management Unit (PMU), headed by a National Project Director, a senior GoB official deputed by LGD; the NPD will be assisted by two or more Deputies, deputed by LGD. The PMU will have the responsibility for the following core functions: grant administration including disbursement, E&S management, compliance monitoring, monitoring and evaluation, financial and procurement management, and reporting. In addition, the PMU will ensure coordination of project implementation, including supervision of and support for the Regional Support Centers (RSCs).

A high-level Project Steering Committee (PSC), chaired by the Secretary LGD, will include members from all relevant ministries and agencies (in sectors such as health, social protection, disaster management, and agriculture) will be set up at the ministry. The PSC will be responsible for strategic discussions and decisions, inter-agency coordination, and overall project monitoring and oversight. The PSC would be expected to meet on a six-monthly basis or on an as-needed basis.

The PMU will consist of a team of consultants (reporting to the NPD and Deputy Project Directors). PMU consultants will include specialists to cover the following main areas: (a) ULGIs grants (including CRG allocations and management, ULGIs compliance assessments and audits); (b) ULGIs technical, institutional and capacity building support; (c) ULGIs disaster risk management and crisis response; (d) monitoring, evaluation and reporting (including MIS, ULGIs progress reports, LGCRRP narrative and progress reporting); (e) communications; (f) environmental and social management; (g) procurement; (h) financial management (including ULGIs and project financial reporting).

For the implementation of key Component 2 activities, the project will establish Regional Support Centers (RSCs) in each of the eight administrative Divisions of Bangladesh. Each RSC will be staffed by consultants, recruited by the PMU; RSCs will be accountable to the PMU. The RSCs will ensure project coordination with administrative authorities and de-concentrated sector departments within their respective Divisions and backstop all ULGIs within each Division.

Within each participating ULGIs, a small Project Implementation Unit (PIU) will be responsible for ensuring that planning, budgeting, implementation, and reporting are undertaken in accordance with LGCRRP procedures. PIUs will consist of regular ULGIs staff, deputed on a part-time basis to coordinate LGCRRP-financed activities at the local level. The PIUs in each ULGIs will ensure that TLCCs engage fully in project activities and play a key role in local-level coordination and in facilitating public engagement and consultations.

4.2.1 E&S Institutional and Implementation Arrangements

The PMU in LGD will include a Senior Environmental Specialist, a Senior Social Development Specialist, and a Communications and Citizen Engagement Specialist. The RSCs will also have Environmental and Social Specialist and Community Development Specialist consultants. The PIUs in the ULGIs will be supported for E&S management in subproject processes. Environmental and Social specialists will be full time PMU consultants to monitor ESMF, ESCP, SEP and LMP implementation and ensure compliance with both World Bank and Government E&S requirements. While, deputed staff of PIU will be responsible for E&S compliance and monitoring, ULGIs can spend a portion of the CRG for E&S expertise, if required. Institutional structure for ESMF Implementation has been furnished in Figure 4.1.

4.2.2 Environmental and Social Assessment and Management Process

- The environmental and social experts of the PMU/LGCRRP through its regional units i.e. Regional Support Center (RSC) will provide technical backstopping and coordination support to the PIU/ULGIs to perform the environmental and social screening. The relevant experts of RSC and PIU will start the task during the preparatory stage of the project.
- If E&S Screening would identify any activities that requires further E&S Assessment, respective PIU/ULGI will engage an independent IEE/ESIA consultant to generate a detail environmental and social baseline of the project, conduct IEE and the ToR for ESIA (if recommended by DoE).
- PIU/ULGI will share the IEE report and the ESIA ToR with DoE for Clearance.
- PMU/LGCRRP will review and clear screening and environmental assessment reports made by Environmental consultant before submitting for DoE clearance and provide necessary technical inputs.
- PMU through RSC/LGCRRP will conduct verification of some screening and assessment through field visit.
- RSC through relevant staff of PIU/ULGIs will ensure that environmental considerations are given enough attention, weight, and influence over selection of construction sites and improvement of infrastructures all over the country.
- Bid documents will be prepared by the PIU/ULGIs. Environmental and social consultants of RSC will make sure necessary environmental and social clauses are included in the bidding documents and ESMP implementation should be done by Contractors. RSC consultants and PIUs Engineers of the respective ULGI will supervise ESMP implementation and E&S compliance.
- All the activities of LGCRRP will follow existing Environmental Code of Practices (ECOPs) prepared under ESMF.
- The project will ensure that environmental and social impact assessment addresses all potential environmental and social direct and indirect impacts of the project throughout its life: pre-project, during project and operation stages; and suggest appropriate mitigation measures. If any additional impacts are identified, IEE/ESIAs and ESMP should be reviewed and updated.

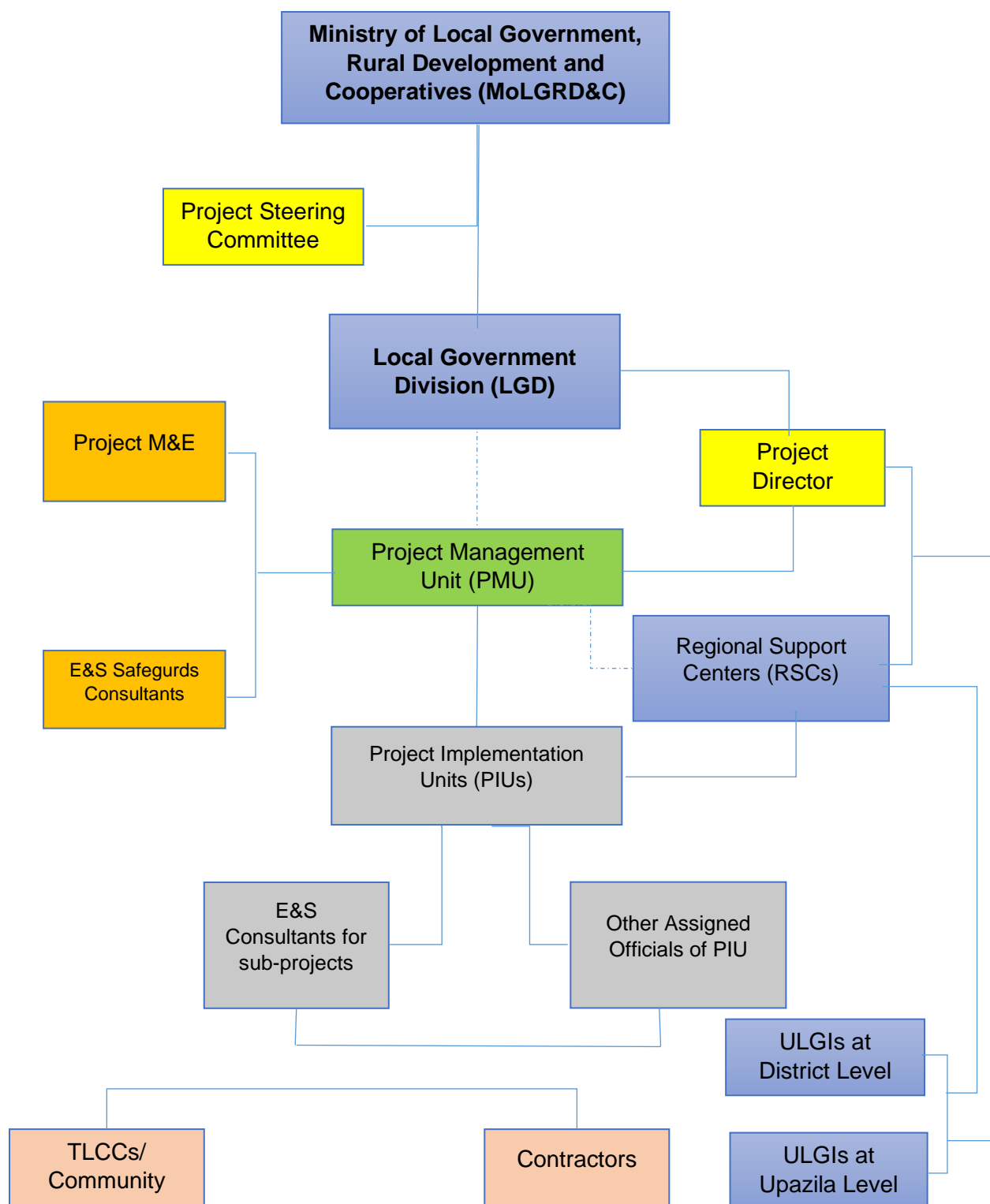


Figure 4.1: Institutional Structure for ESMF Implementation

Screening. The screening matrix will help to decide the suitability of project activities in that particular site, and the level of Impact Assessment required. During screening, if it is found that the project may create major irreversible damage to the area or may violate an existing rules or regulations, including those generating hazardous waste will be included in the negative list of activities the project will not finance. For instance, any activities that may encroach into an ecologically critical area or a national/ global heritage site will be rejected by the PMU/LGCRRP. PMU/LGCRRP through its RSC experts must confirm that the findings of the screening carried out by the PIU/ULGIs. Moreover, alternative project activities/methods and/or operation will be considered, and the impacts will be assessed to make the project more environment friendly and socially acceptable. A sample screening form has been attached at Annex 1, which will be further developed during the implementation stage.

The subproject will be Ineligible for proposed investment if E&S risks and impacts are identified in screening as substantial or high risk.

4.3 Environmental and Social Impact Assessment

Initial Environmental Examination (IEE)

If any E&S Screening exercise of a particular project activities recommend further E&S Assessment, then the IEE study will be conducted under PIU/ULGIs. However, according to the project planning, the activities those need IEE will be implemented at initial period and must be carried out prior to the actual interventions start. The purpose of the IEE is three folds:

- (i) to obtain Clearance from DoE and obtaining decision from DoE whether the particular project activities need further assessment such as detail ESIA or not;
- (ii) provide/finalize the ToR for the ESIA study, if required; and
- (iii) continue consultations with project stakeholders.

Environmental and Social Impact Assessment (ESIA)

The purpose of ESIA is to give the environment and people its due importance in the decision-making process by clearly evaluating the environmental and social consequences of the proposed study before action is taken. Early identification and characterization of critical environmental and social impacts allows the public and the government to form a view about the environmental viability and social acceptability of a proposed development project and what conditions should apply to mitigate or minimize those risks and impacts.

In the preparation phase, the ESIA shall achieve the following objectives:

- To establish the environmental and social baseline in the study area, and to identify any significant environmental issue;
- To assess these impacts and provide for measures to address the adverse impacts by the provision of the requisite avoidance, mitigation and compensation measures;
- To integrate the environmental issues in the project planning and design;
- To develop appropriate management plans for implementing, monitoring and reporting of the environmental mitigation and enhancement measures suggested.

The impact assessment will be conducted using major stages as shown in the following diagram Figure 4.2:

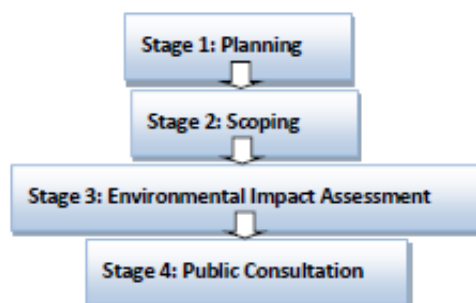


Figure 4.2: Diagram: Impact Assessment Process

Contingency Plan for COVID-19

LGCRRP will develop a contingency plan following the WHO guidelines and the World Bank requirements for each district to put in place procedures in the event of COVID-19 reaching the area or already there. The contingency plan will be developed in consultation with national and local healthcare facilities, to ensure that arrangements are in place for the effective containment, care and treatment of workers who have contracted COVID-19. The contingency plan will also consider the response at the events of infections among the workforce, community transmission is taking place and when it is likely that access to and from a target area will be restricted to avoid spread of COVID-19.

The contingency plan will be lucid to GBV risks screening and putting in the corresponding measures to prevent and mitigate the SEA/SH risks. The contingent incidents will be duly registered with the GRM with observations of anonymity protocol. The Emergency Action Plan (EAP) will have contingency budget for any possible referral services available in the beneficiary areas. The Contingency Plan will be developed in consideration of the potential challenges with the project staff and workers in COVID-19 situations including health and safety of the workforce as well as the beneficiary communities.

4.4 Environment and Social Management Plan (ESMP)

This section presents the outline environmental and social management plan (ESMP) of the LGCRRP. A more detailed version of ESMP must be included in the IEE and if required in ESIA of the respective PIU/ULGIs-LGCRRP.

4.4.1 Scope and Objectives of ESMP

The basic objective of the ESMP is to manage risks and impacts of project interventions in a way that minimizes the possible adverse impact on the environment and people of the project influence area. The specific objectives of the ESMP are to:

- Identify the mitigation measures during ESIA of CRG investments; and facilitate implementation of those during implementation by PIU/ULGIs-LGCRRP;
- Maximize and sustain potential program benefits and control negative impacts;
- Draw responsibilities for program proponent, contractors, consultants, and other members of the program team for the environmental and social management of the program;

- Define a monitoring mechanism and identify monitoring parameters in order to:
 - Ensure the complete implementation of all mitigation measures,
 - Ensure the effectiveness of the mitigation measures,
 - Maintain essential ecological process, preserving biodiversity and where possible restoring degraded natural resources and habitats; and
 - Assess environmental training requirements for different stakeholders at various levels.

The ESMP will be managed through a number of tasks and activities and site-specific management plans. One purpose of the ESMP is to record the procedure and methodology for management of mitigation identified for each negative impacts of the project. The management will clearly delineate the responsibility of various participants and stakeholders involved in planning, implementation and operation of the project.

4.4.2 Inclusion of Relevant Components of ESMP in Contract Documents

The specific IEE/ESIA should include a section on special environmental clauses to be incorporated in the Tender Document under General/Particular Specification. These clauses are aimed at ensuring that the Contractor carries out his responsibility of implementing the environmental and social management plan (ESMP), monitoring plan as well as other environmental and safety measures. Such clauses may specify, for example, penalties for non-compliance as well as incentives to promote strong compliance. The various contractors must be made accountable to implement the plans and mitigation measures which pertain to them through contract documents and/or other agreements of the obligations and importance of the environmental and social components of the program. In addition, the specific ESIA will ask to submit an ESMAP to encompass all of the detailed plans, measures and management systems they are required to develop and implement, to be based on the ESMF recommendation and ESIA findings, their work methodology, work force involvement, equipment's standard, and work scheduling.

4.4.3 Payment Milestones

Payments to contractors would be linked to environmental performance, measured by completion of the prescribed environmental and social mitigation measures. Contractors would be required to join forces with the executing agency, project management unit, supervising consultants and local population for the mitigation of adverse impacts of the program. For effective implementation of the proposed mitigation and monitoring measures they would attract trained and experienced environmental management staff.

4.4.4 Guideline to Incorporate Environmental Management in Bid Documents and Project's Operational Manuals

PIU/ULGIs-LGCRRP will be responsible to incorporate environmental management requirements in the bidding documents and the different operational manuals of the project activities, with the assistance of the environmental consultants or inhouse responsible staff. The generic guidelines to incorporate environmental and social aspects for this purpose are listed below. These are examples only and shall be further elaborated and expanded upon based on the findings and recommendations of the specific IEE/ESIAs.

- Prepare cost estimates, to be incorporated in Bid Documents.
- Contractor version of the Environmental Management Plan along with the ECoPs to be incorporated in the bid document's work requirements.

- Penalty clauses for not complying with ESMP requirements to be incorporated (as per addendum to Clause 17.2 Contractor's Care of the Works of FIDIC).

4.4.5 Environmental Codes of Practice (ECoPs)

The environmental codes of practice (ECoPs) are generic, non-site-specific guidelines. The ECoPs consist of environmental management guidelines and practices to be followed by the contractors/implementation organizations for sustainable management of all environmental issues. The contractor will be required to follow them and also use them to prepare site-specific management plans. Details of the relevant ECoPs listed below are in Annex 2.

- ECoP 1: Waste Management
- ECoP 2: Drainage Management
- ECoP 3: Top Soil Management
- ECoP 4: Topography and Landscaping
- ECoP 5: Borrow Areas Management
- ECoP 6: Air Quality Management
- ECoP 7: Noise and Vibration Management
- ECoP 8: Road Transport and Road Traffic Management
- ECoP 9: Construction Camp Management
- ECoP 10: Cultural and Religious Issues
- ECoP 11: Workers Health and Safety.

4.4.6 Management of Vulnerable and Disadvantaged Groups, Communities, and Individuals

The project will design and provide skills development training and livelihoods support to the vulnerable communities and establish mechanism at the ULGIs and project level to address risks of discrimination, sexual exploitation, and abuse (SEA) and sexual harassment (SH). Small Ethnic and Vulnerable Community Plan (SEVCP) will be included in the ESMP for works packages influencing vulnerable communities. The SEVCP will provide guidance in identification of vulnerable communities, engaging with them inclusively in development dialogue and developing measures to maximize subproject benefits to them. The project will identify these people with special needs for their age, gender, ethnicity, religion, physical, mental or other disability, sexual orientation, poverty and indigenous status including any challenges in their participation in subproject process and ensure non-discrimination to access project benefits.

4.5 COVID-19 Health and Safety of the Workforce

The PIU/ULGIs should identify measures to address the COVID-19 situation. What will be possible will depend on the context of the project activities: the location, existing resources, availability of supplies, capacity of local emergency/health services, the extent to which the virus already exist in the area. A systematic approach to planning, recognizing the challenges associated with rapidly changing circumstances, will help the project put in place the best measures possible to address the situation. PIU should refer to guidance issued by relevant authorities, both national and international (e.g. WHO). Addressing COVID-19 at a project site goes beyond occupational health and safety and is a broader project issue which will require the involvement of different members of a project management team. The Labor Management Procedure (LMP), separate from this ESMF, details the requirements under the COVID-19

pandemic for management of civil works. Health and safety measures for the workers have also been provided in Annex 3.

4.6 Labor Management Procedures

A standalone Labor Management Procedure (LMP) has been prepared to fulfill the requirement of ESS2 and will be disclosed by PMU/LGCRRP prior to appraisal of the project by World Bank. Site specific LMPs will be prepared as part of the ESMPs/C-ESMPs as indicated in earlier sections of this ESMF.

4.7 Community Health and Safety Measures

The Contractors shall follow the standards set by World Bank ESS4 in order to ensure the health and safety of the community. All schemes and sub-schemes including civil construction, renovation, repair roads and sanitation, installation of water supply & sanitation facilities, shall be inspected by LGCRRP and respective representatives of ULGIs/PIUs and to assess any risks or hazards associated. After inspection, the competent professionals from LGCRRP/ULGIs shall certify which shall reflect on the risk of adverse consequences posed by the nature and use of the structural elements and the natural conditions of the area. Since the locations of the project are in different zones of the country community people, beneficiaries and projected affected people are to be consulted for broader support in selection of location of the proposed schemes and sub-schemes activities.

LGCRRP shall appoint quality management systems to anticipate and minimize any risks and impacts that may have on community health and safety. Traffic and road safety should be ensured, as the materials will be carried to the project sites by truck and local transport, therefore, reckless driving of the heavy vehicles are to be controlled to avoid accidents, noise and air pollutions.

The proliferation of COVID-19 should be taken into cognizance while interacting with local community. Relations with the community should be carefully managed, with a focus on measures that are being implemented to safeguard both workers and the community. The community may be concerned about the presence of non-local workers, or the risks posed to the community by local workers presence on the project site.

4.8 Repossession of Land from Encroachers for Project Works

Involuntary acquisition of land and displacement of people will be avoided for any investments under this project (negative list at Section Error! Reference source not found.). When a CRG investment proposed by ULGIs finds a small strip of existing land proposed for infrastructure development or rehabilitation is encroached in, the encroacher of public land, if persuaded, may elect to dispossess the land strip(s) voluntarily with or without compensation for the structures to be shifted to vacate the land. The ULGI will engage with the encroachers likely to be affected under any subproject to identify, discuss, and agree on mechanisms of dispossession and repossession of the strip of encroached land documented in site specific ESMPs. Only small strip(s) of encroached land (less than one decimal) will be acceptable that does not induce physical relocation or permanent economic displacement of people. The ULGIs will ensure that,

- The dispossession is voluntary with or without compensation.
- The remaining land is suitable to continue the current use.

- The dispossession does not affect the livelihood of affected persons and, if it does, the ULGI devises and implements mitigation measures acceptable to the affected persons.
- The affected persons/dispossessors are made aware of the grievance redress mechanism described at Section 5.3.
- The act of voluntary dispossession with or without compensation of the affected structures will be documented through an MOU signed by the dispossessors with the ULGIs authorized representatives.
- If compensation for affected structure is agreed in the MoU, the payment must be made before dispossession of the encroached land demarcated for the CRG subproject(s).

4.9 Consultation and Participation Plan

A separate SEP has been prepared which discussed the ESS10 requirements elaborately.

4.10 Guideline for preparation of Environmental and Social Monitoring Plan

The monitoring plan is the key element of ESMP to be prepared based on impact assessment described in earlier section. The Plan describe the potentially negative impacts of each program activity, lists mitigation and control measures to address the negative impacts, and assigns responsibilities for implementation and monitoring of these measures. The E&S Monitoring Plan for the each PIU/ULGI-LGCRRP will be prepared and included in the ESMPs.

4.10.1 Monitoring Program

As one of the key elements of the ESMP, a two-tier monitoring program is proposed comprising compliance monitoring and effects monitoring. The main purpose of this monitoring program is to ensure that the various tasks detailed in the ESMP particularly the mitigation measures are implemented in an effective manner, and to evaluate program impacts on the key environment parameters. Various types of ESMP monitoring are discussed below.

Compliance Monitoring. The purpose of the compliance monitoring is to ensure that the contractor implements the mitigation measures given in the ESMP are effectively and timely implemented. This monitoring will generally be carried out by the PIU/ULGIs-LGCRRP with the help of checklists to be prepared on the basis of the Mitigation Plan (to be prepared).

Effects Monitoring During Project Implementation. Effects monitoring is a very important aspect of environmental management to safeguard the protection of environment. While the PIU/ULGIs are responsible for effect monitoring during the project implementation, a RSC headed by a Regional Coordinator under the Project Director/LGCRRP will be formed in each division consisting of other members like E&S Consultants, Stakeholders Engagement and Communication Consultant, and other nominated officials from PMU to assist the PIU/ULGIs in effects monitoring. The monitoring will comprise surveillance to check whether the contractor is meeting the provisions of the contract during construction and operation of the program including the responsible agencies for implementation and supervision.

Performance Indicators. For evaluating the performance of the environmental management and monitoring plan, performance indicators are identified to for efficient and timely implementation of measures/actions proposed in ESMP. The indicators are defined both for implementation phase and for post project period. PIU/ULGIs will be responsible for compiling the information on these indicators and report to RSC-PMU/LGCRRP.

Separate performance indicators for each environmental and social issue will be specified in the mitigation plans for the PIU/ULGIs and included in the associated IEE/ESIA. To measure the overall environmental and social performance of the project, an additional list of performance indicators is given below.

- Number of inspections carried out by PIU/ULGIs or RSC-PMU per month.
- Number of non-compliances observed by PIU/ULGIs or RSC-PMU.
- Availability of environmental specialists in PIU/ULGIs or RSC-PMU.
- Availability of social specialists in PIU/ULGIs or RSC-PMU.
- Availability of environmental specialists with contractors.
- Timely reporting of documents (as defined in ESMP and monitoring plan).
- Number of trainings imparted to stakeholders/other capacity building initiatives.
- Timely disbursement of compensation/ timely resettlement of program affectees (if any).
- Timely implementation of activities schedule.
- Number of grievances received.
- Number of grievances resolved.
- Number of constructions related accidents.

4.11 Environmental and Social Management Capacity

The LGCRRP will be managed by LGD through a Project Management Unit (PMU). LGD has the capacity to manage environmental and social risks and impacts in a manner consistent with Bank requirements. LGD has long experience in managing environmental and social requirements under the safeguards OPs of the Bank as it has been implementing the Bank financed Local Governance Support Project (LGSP) since 2008.⁴ Some of the ULGIs have experience in managing social and environmental risks. LGD will be able to provide ULGIs with adequate support to mitigate the moderate environmental and social risks of the project.

Internal E&S management System

The PMU/LGSP in LGD at the central level usually screens projects for IEE or EIA as per ECR 1997 provisions, undertake the preparation of IEE/EIA and obtain ECC from the Department of Environment. The responsibility of E&S risk management lies on the PIU/PMU which includes conducting supervision and monitoring of project interventions as per recommendations of the ESMP. They usually hire consultants for ESA preparation (ESMF or EIA preparation). Supervision of E&S mitigation activities are also assisted by consultants, also hired by the PMU/PIU but typically not the same consultants who prepared the ESA. Project Director is responsible during the implementation stage of projects. He assisted by the E&S consultants has major role in engagement of contractors, construction supervision, environmental and social impact supervision and mitigation of the project. The responsibilities also include incorporation of the environmental codes of practices in the bid document of the contractors based on the approved IEE/EIA documents and hiring contractors is the responsibility of the PMU/PIU.

There is no internal review or auditing systems for environmental and social management in LGD. There are some designated project level posts in the past to do the job to supervise the environmental and social impact issues, and for most of the cases they were trained to comply with the WB's policies. It has inbuilt

⁴ LGSP 1 and LGSP 2 have been completed; LGSP 3 is ongoing.

Grievance Redress Management (GRM) process guided by the GoB's GRM Guideline 2015, but it is currently primarily managed on a reactive basis, coordinated through MLGRD&C.

4.12 Capacity Building Plan

Capacity building for effective implementation of the ESSs requirements is a key element of the ESMP. Capacity building for environmental and social safeguard management will need to be carried out at all tiers of the LGCRRP, including LGD, ULGIs (329 Paurasavas and 10 CCs) and contractors. At the construction site, PIU/ULGIs-LGCRRP will take the lead in implementing the capacity building plan, though the contractors will also be responsible to conduct trainings for their own staff and workers. The various aspects that are covered under the capacity building will include general environmental and social awareness, key environmental and social sensitivities of the area, key environmental and social impacts of the project, ESMP requirements, OHS aspects, and waste disposal. Hence, a separate Capacity Building Plan (CBP) for the LGCRRP has been prepared which will be the main guiding document to build capacity of LGD and ULGIs for implementing this ESMF. Following paragraphs provides summary of the capacity building requirements as assessed in this report.

4.12.1 Training on E&S Management

Advanced training on environmental and social management and monitoring will be useful for the officials of the LGD and ULGIs in successfully implementing environmental and social management. It is also necessary to provide basic training for key personnel on regulatory requirements, environmental impacts, and environmental assessment and management in home or abroad. They can participate in field-based training including the environmental and social impact assessment, screening, scoping, mitigation and monitoring of existing construction, rehabilitation and maintenance projects under the LGD.

The training program for the proposed PMU and ULGIs Staff shall be based on their expanded functions and new and additional safeguards areas covered by the World Bank's ESF. Hence, a general introduction to the new World Bank's ESF should be priority, followed Labor and Working Conditions, Community Health and Safety and Stakeholder Engagement. In regard to IEE/ESIA, a training should also be schedule later in Year 1 of the project. The other areas which the units should immediately be trained on are field compliance monitoring and audits, particularly on C-ESMP Compliance and occupational and community health and safety audit, cultural heritage assessment and impacts management; and biodiversity and wildlife impact management for construction/renovation/expansion projects (Table 4.1). Finally, since in the long run it will be efficient for the staff of E&S units (central, regional and local levels) to contract out works to consultants, not only for preparation of IEE/ESIA, but also field monitoring and evaluation, it is imperative that the PMU, RSC and ULGIs staff shall be skilled in consulting contract management. Hence a training module on such topic is also proposed.

Table 4.1: Training Plan and Budget under LGCRRP

Seminar Topic/Training Module	Prospective Attendees	Time Frame	Duration (Days)	Training no.	No. of Participants	Responsibility	Indicative Cost in million BDT
1. Introduction to World Bank ESF	PMU and ULGIs staff	Year 1, Year 3	3	12	350	PMU Environmental and Social Consultants	1.20

Seminar Topic/Training Module	Prospective Attendees	Time Frame	Duration (Days)	Training no.	No. of Participants	Responsibility	Indicative Cost in million BDT
2. Labor and working conditions	PMU and contractors	Year 1, Year 2	3	2	60	PMU Environmental and Social Consultants	0.20
3. Community health and safety	LGD, PMU and contractors	Year 2	3	1	30	PMU Environmental and Social Consultants	0.10
4. Stakeholder Engagement	PMU and ULGIs staff	Year 1	3	12	350	PMU Environmental and Social Consultants	1.20
6. Preparation of IEE/ESIA under ESF	PMU and ULGIs staff, DOE by invitation	Year 1 and Year 2	3	12	350	PMU Environmental and Social Consultants	1.20
7. ESMP compliance monitoring and audit	PMU and ULGIs staff and Field Engineers	Year 1, Year 2	3	12	350	PMU Environmental and Social Consultants	1.20
8. Cultural heritage and religious institutions impacts management	PMU and ULGIs staff, Department of Archaeology staff.	Year 3	3	12	350	PMU Environmental and Social Consultants	1.20
		Total					6.30

4.12.2 Monitoring and Evaluation

To keep track of the progress and outcomes of the implementation of the Capacity Building Plan, the management of the LGCRRP will periodically monitor and evaluate the sets of indicators in Table 4.2. The Capacity Building Plan Monitoring and Evaluation Reports should be provided to and discussed with the World Bank task team during each supervision mission.

Table 4.2: Capacity Development Indicators

Actions	Indicator	Method of Collection
Inputs		
Staff Recruited at PMU and PIU	No. of new staff hired Number of consultants hired	Reports
Trainings Conducted	Number and types of trainings conducted	Reports
Coordination meetings conducted	Number of coordination meetings conducted; invitation letters sent.	Office Records

Actions	Indicator	Method of Collection
Outputs		
Expanded role of LGD, PMU and PIU staff	Memorandum Circular expanding roles and coverage	Copy of the MC
Prepare new/update protocols	Number and types of protocols developed	Copies of the Protocols
Prepare new/update guidelines	Number and types of guidelines developed	Copies of the Guidelines
Outcomes		
Scope of activities	Range of activities conducted	Reports and Staff Interviews
Skills of staff	New tasks undertaken by staff	Reports and Staff Interviews
Resource endowments	Annual budget, Office space, New equipment	Reports, Staff Interview
Coordination and involvement	Number of agencies involved in E&S Management of LGD and ULGIs	Reports and Staff Interview
Results/Performance		
Preparation of subprojects/CRG proposals	No. of subprojects prepared adequately responding to the requirements of the new ESF and relevant ESSs	RSC-PMU and ULGIs records
Review and approval of subprojects/CRG proposals	Number of site-specific E&S reports (screening, impact assessment and management plans) reviewed and approved under the new ESF compliant system	RSC-PMU and ULGIs records
Environmental and Social Auditing	Number of subprojects audited under new ESF compliant system	RSC-PMU and ULGIs records
Awareness of ESF	Percentage of LGD and ULGIs staff that are aware of the new ESF	Staff Interviews

4.13 ESMF Implementation Cost

Estimated cost will be prepared for all the mitigation and monitoring measures to be proposed in the specific screening/IEE/ESIA and compliance required for the ESMF. The cost estimates for some of the mitigation measures to be identified in the ESMP will be part of civil works contract. Some of suggestive activities from screening/IEE/ESIA will be implemented by hiring experts (if required). The Development Project Proposal (DPP) of LGCRPP/LGD should reflect the ESMP activities with sufficient budget allocation for successful environmental and social management of the project. Total BDT 1083,00,000 is estimated for implementation of ESMF which should be embedded in the proposed total project budget from IDA.

Table 4.3: Estimated cost for ESMF implementation of the LGCRPP

SN	Description	Amount in million BDT
1	Contractor's Budget for development of management plans baseline study, development of safety operation plans and monitoring during construction and operation, and monitoring of sites on COVID 19 health and occupation safety	2.00

SN	Description	Amount in million BDT
2	Water, soil and air quality monitoring during construction (quarterly for 5 years)	5.00
3	Tree plantation development and maintenance	5.00
6	Independent Consultants to prepare IEE/ESIA and ESMP	30.00
7	PMU/ LGCRRP Environmental and Social staff	60.00
8	Capacity building, training plan implementation (sec 4.12) and institutional strengthening	6.30
	TOTAL	108.3

Chapter 5: STAKEHOLDERS ENGAGEMENT, DISCLOSURE AND GRIEVANCE MANAGEMENT

A standalone Stakeholders Engagement Plan (SEP) has been prepared for LGCRRP which will be the main guiding document for the project in managing stakeholders' engagement. The following sections are summarizing the ESS10 requirements for stakeholder's consultations and information disclosures.

5.1 Stakeholder Consultations and Information Disclosure

Considering the context of the COVID-19 pandemic, Field surveys through sending checklist of required information and virtual consultations with different stakeholders of existing ULGIs and CCs (covered under LGSP 3) that were carried out to develop this ESMF of LGCRRP, which were not enough considering the number of ULGIs (329 PSV, 10 CCs) to be involved and dimension of the stakeholders. Extensive field visits are required at the IEE/ESIA stage to overcome this shortcoming and conduct extensive discussions with the relevant stakeholders throughout the project sites to discuss components, sub-components, activities, potential positive and negative impacts, and measures taken to mitigate those impacts. It is also required to record the views of each of the respondents of the consultations, irrespective of gender, profession, religion, and age groups. The ToR of the IEE/ESIA should be described in the public meetings during the initial stage of the IEE/ESIA in all the sites of the proposed project. Findings of the IEE/ESIA will also be presented in local language going back to the same stakeholders while the draft is ready to submit for DoE clearance. Consultation meetings are necessary to identify issues and problems to enable LGCRRP to include corrective measures and to identify lessons and opportunities to enhance project implementation mechanism.

5.1.1 Methodology and Tools for the Consultation

The consultation and participation process in preparing the ESMF was limited to selected stakeholders both at the ULGIs and at the regional and national level, since specific sites have not been identified yet. Stakeholders' consultation and engagement at the individual household level was not carried out during the preparation of the ESMF. However, this will be done at the site level once they are identified. The consultation will be carried out in a culturally/socially appropriate manner so that specific requirement of various groups (separate venue and timing for women friendly consultation, access to venue for the persons with disability etc) are considered and consultations are planned accordingly

Stakeholders are people, groups, or institutions, which are likely to be impacted (either negatively or positively) by the proposed project interventions or those who can influence the outcome of the project. A stakeholders mapping was conducted prior to conducting consultation meetings held virtually using web-based platform. The project affected parties include individuals, groups, local communities and other stakeholders that are directly or indirectly affected by the Project, with particular focus being accorded to those directly and/or adversely affected including those who are more susceptible to changes associated with project activities. The other interested parties are NGOs, community-based organizations, community development projects, governance agencies, development partners, media, community leaders, civil society, traders, construction laborers and consultants in the project area.

The various tools identified in the SEP will be used for consultations including household level interviews, participatory rural appraisal, FGDs, stakeholder's consultation meetings, issue specific consultation meetings, open meetings, and workshops at both local and national levels. During IEE/ESIA, consultation meetings and FGDs will be carried out in all sites/ULGIs and local level workshops will be organized at some selected wards (lowest administrative units of ULGIs) to ensure comprehensive coverage of the entire project area and provide specific list of interventions.

During preparation of ESMF, LGCRRP has conducted 2 virtual consultations with different stakeholders during COVID-19 pandemic using virtual web-based platform. The discussion and the concerns and responses are extensively documented in the standalone SEP. A summary of consultation meetings is given below in Table 5.1.

Table 5.1: Summary of Consultation Meetings

No.	Date	Venue	ULGI Type
1	February 02, 2021	Virtual Stakeholders Consultation Workshop using Zoom	15 Pilot Poursava covered under the LGSP 3
2	February 09, 2021	Virtual Stakeholders Consultation Workshop using Zoom	10 City Corporation covered under the LGSP 3

In addition to the two virtual consultations, the team has conducted remote survey through sending specific checklist developed for collecting required information from 15 Poursavas of LGSP 3.

5.1.2 Outcomes of Consultation Meetings and Remote Survey

A summary of consultation outcomes is given below in:

Stakeholders' Consultation – 1: Virtual Stakeholders Consultation Workshop using Zoom with 15 PSVs

- Participating ULGIs have capacity to implement the project activities maintaining E&S compliance at the local level.
- PSVs have ample demand of funding through CRG method to overcome the COVID-19 setback.
- Project should have activities to provide technology-based training to ensure future skills of the COVID-19 affected people.
- Most of the ULGIs have scarcity of modern solid waste management and sewerage systems.
- Some ULGIs have urged for investment on environmental improvement and beautification of the existing natural areas to improve living conditions of the citizens.
- Some ULGIs have demand to improve local health services provided including infrastructure and equipment.
- Most of the PSVs have inbuilt practice of involving local stakeholders and beneficiaries in scheme selection and monitoring.
- PSV's engineers are primarily responsible for project implementation and E&S supervision and monitoring.
- Women participation are ensured at all stages of project cycle by the ULGI leaders mentioned by the participants.

Stakeholders' Consultation-2: Virtual Stakeholders Consultation Workshop using Zoom with 10 CCs

- Schemes implemented by the CCs are in comparison larger than the PSVs, hence required increased funding to combat pandemic impacts.

- Type of schemes required for funding through LGCRRP in CCs are mostly around waste management, sewerage treatment, communication development, health service improvement, water and sanitation, housing and generating employment opportunities for city dwellers, specially for the lower income groups.
- Most of the CCs have inbuilt practice of engaging local stakeholders' in scheme selection, planning and implementation monitoring and well setup local GRM process exist.
- CCs staff responsible for project planning and implementation are experienced in E&S compliance monitoring and safeguarding.
- No such evidence of violating E&S compliance was reported by the participants, except mentioning some minor and localized pollution events.
- Climate change and disaster (e.g. recurring flooding, water logging, etc.) are common in most of the CCs, need to address by the CRG.

As this was the first efforts of organizing web-based stakeholders' consultation, due to time limitation several of the above important E&S issues could not be discussed. So, it is suggested that PIU/ULGIs LGCRRP will organize multiple stakeholders' consultation at each construction/renovation sites during IEE/ESIA preparation engaging different stakeholders.

Remote Survey-1: Sending Checklist to 15 PSVs

A remote survey was done by sending an E&S checklist in the 15 pilot PSVs to collect specific data and information required to prepare the ESMF. Summary of the environmental issues found in the remote survey is given below:

- Most of the surveyed PSVs have either natural flowing rivers/water bodies or vegetation coverage, those need to take care of during project planning and implementation.
- PSVs have no such sensitive ecological area or biodiversity which required special attention for conservation.
- PSVs have demand for development works through LGCRRP mostly around waste management, sewerage treatment, communication development, health service improvement, water and sanitation, housing and generating employment opportunities for city dwellers, specially for the lower income groups.
- Most of the PSVs have never conducted any kind of advance level E&S assessment i.e. IEE/ESIA given that the type of schemes had no such adverse environmental and social impacts.
- Most of the PSVs have noninstitutional practice of GRM, which might need to be improved by establishing institutional GRM process under LGCRRP. Capacity development for implementation of ESMF is a must for the staff of the PSVs.

5.2 Consultations and Communication Guideline

Consultations with the key stakeholders will need to be carried out throughout the project life. These will include consultations and liaison with communities and other stakeholders during the project implementation and also extensive consultations with the grass-root as well as institutional stakeholders during the IEE/ESIA study. The framework for the future consultations is presented in Table 5.2 below:

Table 5.2: Future Consultation Guideline

Description	Objective/Purpose	Responsibility	Timing	Frequency
Consultations with communities and other stakeholders during project implementation	Information dissemination; public relation; confidence building; awareness about risks and impacts; minimizing conflicts and frictions.	PMU, LGCRRP; Contractors; PIU	During Project Implementation	Project Specific Location of interventions and impacted area.
Consultations with communities and other stakeholders during IEE/ESIA study	Sharing IEE/ESIA ToR	PMU, LGCRRP and IEE/ESIA team	During scoping stage of IEE/ESIA	Consultation meeting at all selected Sites; FGD at all selected Sites
	Dissemination of information on project and its key impacts and proposed mitigation measures; soliciting views, comments, concerns, and recommendations of stakeholders	PMU, LGCRRP and IEE/ESIA team	During IEE/ESIA study (once draft analysis is available for discussion and feedback) before submission to DoE for clearance	Consultation meeting at all selected ULGIs; FGD at All selected Sites; National Stakeholders' Consultation;
Consultations with communities	Liaison with communities and project beneficiaries	PMU, LGCRRP/PIU	Post Project Period	As and when necessary

5.2.1 Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations under the outbreak and spread of COVID-19

These restrictions have implications for World Bank-supported operations. In particular, they will affect Bank requirements for public consultation and stakeholder engagement in projects, both under implementation and preparation. WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

During Implementation

With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement, the following are some considerations while selecting channels of communication, in light of the current COVID-19 situation under the LGCRPP:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including webex, zoom and skype;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, such as would be the case for Resettlement Action Plans or Indigenous Peoples Plans preparation and implementation, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
- An appropriate approach to conducting stakeholder engagement can be developed in most contexts and situations. However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, the team should discuss with the PMU whether the project activity can be rescheduled to a later time, when meaningful stakeholder engagement is possible. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

During Project Preparation:

Where sub-projects are under preparation and stakeholder engagement is about to commence or is ongoing, such as in the project E&S planning process, stakeholder consultation and engagement activities should not be deferred, but rather designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. Some suggestions for advising clients on stakeholder engagement in such situations are given below. These suggestions are subject to the coronavirus situation in country, and restrictions put in place by governments. The task team and the LGD should:

- Review the country COVID-19 spread situation in the project area, and the restrictions put in place by the government to contain virus spread;
- Review the draft Stakeholder Engagement Plan (SEP, if it exists) or other agreed stakeholder engagement arrangements, particularly the approach, methods and forms of engagement

proposed, and assess the associated potential risks of virus transmission in conducting various engagement activities;

- Be sure that all task team and PIU members articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings, and minimize direct interaction between project agencies and beneficiaries / affected people;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including webex, zoom and skype meetings;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently. Such channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project. Webex, Skype, and in low ICT capacity situations, audio meetings, can be effective tools to design virtual workshops. The format of such workshops could include the following steps:
 - Virtual registration of participants: Participants can register online through a dedicated platform.
 - Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics: These can be distributed online to participants.
 - Review of distributed information materials: Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.
 - Discussion, feedback collection and sharing:
 - ✓ Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this.
 - ✓ Group, team and table discussions can be organized through social media means, such as webex, skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.
 - Conclusion and summary: The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.
- In situations where online interaction is challenging, information can be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp groups, Project weblinks/ websites, and traditional means of communications (TV, newspaper, radio, phone calls and mails with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.

- *Engagement with direct stakeholders for household surveys:* There may be planning activities that require direct stakeholder engagement, particularly in the field. One example is resettlement planning where surveys need to be conducted to ascertain socioeconomic status of affected people, take inventory of their affected LGCRRPs, and facilitate discussions related to relocation and livelihood planning. Such survey activities require active participation of local stakeholders, particularly the potentially adversely affected communities. However, there may be situations involving indigenous communities, or other communities that may not have access to the digital platforms or means of communication, teams should develop specially tailored stakeholder engagement approaches that will be appropriate in the specific setting. The teams should reach out to the regional PMs for ENB and SSI or to the RSA for the respective region, in case they need additional support to develop such tailored approaches.
- In situations where it is determined that meaningful consultations that are critical to the conduct of a specific project activity cannot be conducted in spite of all reasonable efforts on the part of the client supported by the Bank, the task team should discuss with the client whether the proposed project activities can be postponed by a few weeks in view of the virus spread risks. This would depend on the COVID-19 situation in the country, and the government policy requirements to contain the virus spread. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

5.3 Grievance Redress Mechanism

The LGCRRP program will establish a grievance mechanism (GRM) for addressing grievances and complaints received from the project affected persons due to environmental and social issues. Grievance Mechanism (GRM) is a valuable tool which will allow affected people to voice concerns regarding environmental and social impacts for LGCRRP's activities. LGCRRP would ensure that grievance redress procedures are in place and would monitor those procedures to ensure that grievances are handled properly. The LGCRRP office will establish a procedure to answer sub-component -related queries and address complaints, disputes, and grievances about any aspect of the sub- component, including disagreements regarding the assessment and mitigation of environmental and social impacts. Details of the institutional arrangements and procedures are discussed in following sections.

Communication & Awareness raising on GRM. The final processes and procedures for the GRM will be translated into local language (i.e. Bangla) and disseminated at all project locations. These shall be made available (in both leaflet and poster format) to all project locations with the PMU, RSCs and PIUs officials on site and in the offices of each DC of the respective ULGIs.

Proposed Institutional Mechanisms. There will be two-tier grievance mechanism; 1st at local level (PIU/ULGI), and at PMU level (NPD). All the local level complaints will be received at the Project Office at ULGIs. All cases at the local level will be heard within two weeks of their receipt. PIU with the support of RSCS/PMU will inform all affected stakeholders and interested group about the project GRM and different committees at local, project, ministry level.

5.3.1 Composition of Local/Site Specific GRC

First level GRC will be formed in the local level where community or local people will be able to raise their grievances directly to the field level project office i.e. PIU/ULGI. PMU/LGCRRP with support from the PIU and RSCS consultants' team will inform all affected people and local community about the project Grievance Mechanism in local language. This local GRC will ensure easy accessibility by the PAPs, local communities and interested stakeholders, so that any grievances can be solved directly or within a very short period of time. The members of the local GRC will be respective Mayor as convener; Engineer from the PIU or other senior officials from ULGI as members secretary, nominated by Mayor; members representative from local ward members, teacher from Local Educational Institution, representative from Local Women's Group, and representative from the PAP Group. (Table 5.3)

The membership of the GRCs will ensure proper presentation of complaints and grievances as well as impartial hearings and investigations, and transparent resolutions. Where grievances are among the affected persons, the membership composition of the GRCs will consider any traditional conflict resolution arrangements that communities may practice. If the aggrieved person is a female, PIU will ask the concerned female ULGI Member or Municipal Ward Councilor to participate in the hearings. Members of the GRCs will be nominated by the PIU/ULGIs-LGCRRP

Table 5.3: GRC membership at local/site level

Organization	Member
1. Mayor (PSV/CC)	Convener
2. Engineer from PIU or other ULGI official	Member-Secretary
3. Representative of Local Ward Councilors	Member
4. Representative Teacher from Local Educational Institution	Member
5. Representative from Local Women's Group	Member
6. Representative from the PAP Group	Member
7. Women Representative of ULGI/WC (in case PAP is female)	Member

All complaints will be received at the Site/Upazila Project Office. All cases at the local level will be heard within two weeks of their receipt. Grievances received through any channel will be registered and a notification of receipt with assurance of necessary review and resolution given in writing to the aggrieved persons.

5.3.2 Composition of PMU and PSC level GRC

If a decision at PIU/ULGI level is again found unacceptable by the aggrieved person(s), the case will then refer to the PMU with the minutes of the hearings at local level. NPD will be the convener and Social Specialist/Environmental Specialist will be the member secretary at PMU level. All the unsolved cases at the PMU level, decisions on unresolved cases, if any, will be made in no more than four weeks by an official designated by the Secretary, MLGRD&C. A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon PMU. There will be budgetary allocation for local GRM committee members for participating meetings and refreshments during meeting. Figure 5.1 is showing a hierarchy of GRM process:

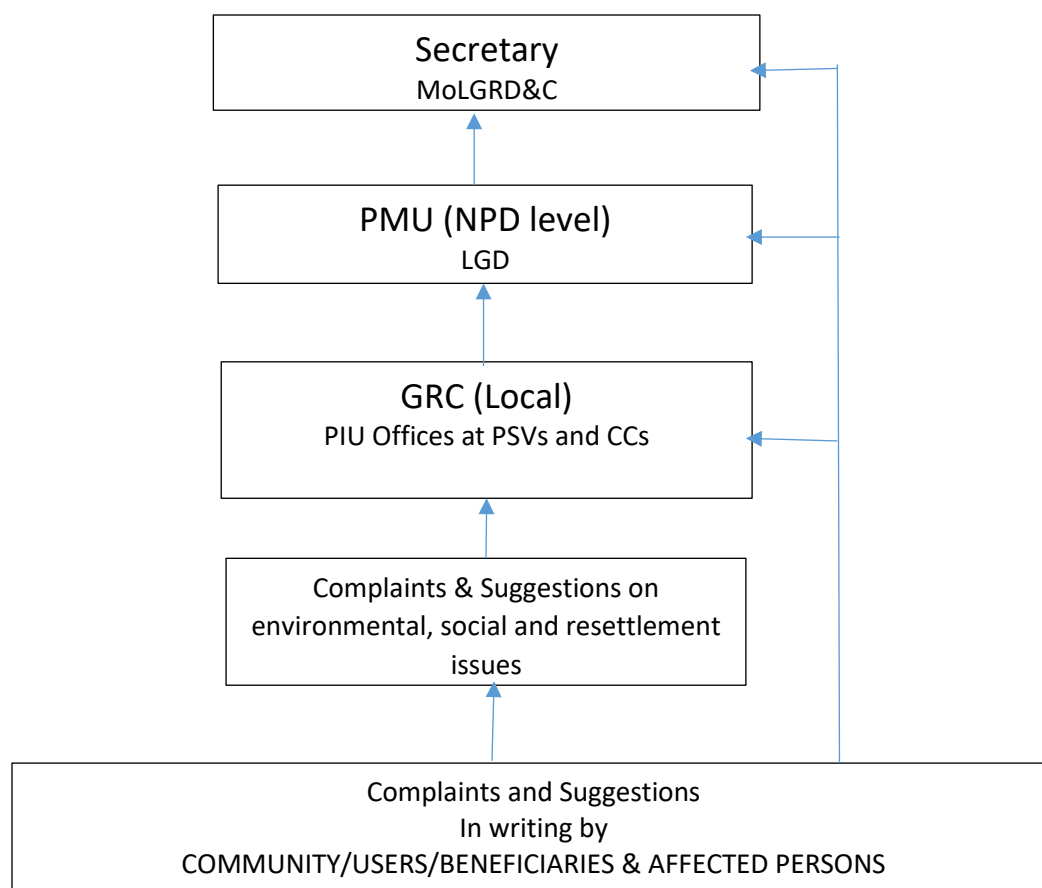


Figure 5.1: GRM Process of the LGCRRP Project

To ensure that grievance redress decisions are made in formal hearings and in a transparent manner, the convener will apply the following guidelines:

- Reject a grievance redress application with any recommendations written on it by a GRC member or others such as politicians and other influential persons. Applications of this nature will be redirected to go through the standard transparent process.
- Disqualify a GRC member who has made a recommendation on the application or separately before the formal hearing: Where a GRC member is removed, appoint another person in consultation with the Project Director.
- The Convener will also ensure strict adherence to the impact mitigation policies and guidelines adopted in this ESMF, other standalone documents e.g. SEP, LMP, and the mitigation standards, such as compensation rates established through market price surveys.

To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. PIU will maintain the following three Grievance Registers: Intake Register, Resolution Register, and Closing Register. The Convener will also ensure strict adherence to the impact mitigation policies and guidelines adopted in this ESMF, LMP, and SEP.

5.4 Information Disclosure

The draft ESMF of LGCRRP will be disclosed to the local and national level stakeholders through different methods as described below.

Workshop. A national workshop will be held at Dhaka to present the detailed project information including E&S aspects of LGCRRP to the key stakeholders. In addition, stakeholders' meetings will be held at some selected PSVs/CCs to disclose the ToR and results of the IEE and ESIA, following COVID-19 protocols mentioned earlier. The workshops will also help to resolve conflicting issues among stakeholders. Besides, FGDs and personal interviews will be carried out at the all selected sites of the LGCRRP project area to generate communities' views and concerns.

Availability of the Document: Summary of the IEE, ESIA and ESMF report along with ESMPs will be translated into Bengali language and disseminated locally. The full report (in English) and the summary (in Bengali) will also be uploaded in the website of LGCRRP and World Bank. Hard copy of the IEE, ESIA, ESMF, SEP and LMP will also be available at LGCRRP regional offices, PSVs and CCs of the project area.

Annexure

Annex 1: Sample Environmental and Social Screening Form

A. ENVIRONMENTAL SCREENING FORM (Sample)

[This form is applicable for Paurashava and to be filled in by WLCC and kept in the Paurashava Scheme file]

Screening Date:.....

District:.....; Upazila:

Paurashava:.....; Ward No.....

Name of Ward Committee Chair:.....

Names of other Ward Committee members participated in screening process SL	Name	Mobile No.	NID No.
1			
2			
3			
4			
5			
6			

Part A: General Information

1. Name of the Scheme:
2. Use of the Scheme:.....
3. Location of the Scheme:
4. The Scheme is located in an area (ward or part of a ward) where residents are:

☐ All mainstream or non-indigenous peoples

☐ All indigenous peoples

☐ Majority mainstream or non-indigenous peoples

☐ Majority indigenous peoples

5. Women were consulted separately: ☐ Yes; ☐ No

6. Scope of Scheme works: ☐ New construction, ☐ Improvements, ☐ Repair/Renovation

7. Brief description of physical features of the Scheme:

.....

Part B: Environmental Issue

1) Potential Environmental Impact during Construction Phase:

(a) Ecological impacts: (important Schemes include storm drain, bridge, box culvert, and boat landing jetty)

- | | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Minor <input type="checkbox"/> | Number of tress |
|--------------------------------------------------------------------|--------------------------------------|-----------------------------------|--------------------------------|-----------------|
| • Felling of trees | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| • Clearing of vegetation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| • Potential impact on species of aquatic (i.e., water) environment | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

(b) Physicochemical impacts: (all Schemes)

- | | | | |
|-------------------------------------------|--------------------------------------|-----------------------------------|----------------------------------------|
| • Noise pollution | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Insignificant <input type="checkbox"/> |
| • Air pollution | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Insignificant <input type="checkbox"/> |
| • Drainage congestion | Very likely <input type="checkbox"/> | Likely <input type="checkbox"/> | Unlikely <input type="checkbox"/> |
| • Water pollution | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Insignificant <input type="checkbox"/> |
| • Pollution from solid/construction waste | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Insignificant <input type="checkbox"/> |
| • water logging | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Insignificant <input type="checkbox"/> |

(c) Socio-economic impacts: (all Schemes)

- | | | | |
|----------------------|--------------------------------------|---------------------------------|-----------------------------------|
| • Traffic congestion | Very likely <input type="checkbox"/> | Likely <input type="checkbox"/> | Unlikely <input type="checkbox"/> |
|----------------------|--------------------------------------|---------------------------------|-----------------------------------|

- | | | | |
|-------------------------------------------|--------------------------------------|-----------------------------------|----------------------------------------|
| • Health and safety | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Insignificant <input type="checkbox"/> |
| • Impact on archaeological and historical | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Insignificant <input type="checkbox"/> |
| • Employment generation | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Insignificant <input type="checkbox"/> |

2) Potential Environmental Impact during Operational Phase:

(d) Ecological impacts: (important Schemes include storm drain and boat landing jetty)

- | | | | |
|--------------------------------------------------------------------|--------------------------------------|-----------------------------------|--------------------------------|
| • Potential impact on species of aquatic (i.e., water) environment | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Minor <input type="checkbox"/> |
|--------------------------------------------------------------------|--------------------------------------|-----------------------------------|--------------------------------|

(e) Physicochemical impacts: (all Schemes)

- | | | | |
|------------------------------------------------------------------|--------------------------------------|-----------------------------------------|----------------------------------------|
| • Potential air quality and noise level (especially for road) | Improvement <input type="checkbox"/> | No-improvement <input type="checkbox"/> | Deterioration <input type="checkbox"/> |
| • Drainage congestion (especially for drain) | Improvement <input type="checkbox"/> | Minor Improve <input type="checkbox"/> | No Impact <input type="checkbox"/> |
| • Risk of Water pollution (especially for storm drain and jetty) | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Minor <input type="checkbox"/> |
| • Pollution from solid waste (especially for SWM, and market) | Improvement <input type="checkbox"/> | No-improvement <input type="checkbox"/> | Deterioration <input type="checkbox"/> |

(f) Socio-economic impacts: (all Schemes)

- | | | | |
|--------------------------------------------------------------------------|--------------------------------------|-----------------------------------------|----------------------------------|
| • Traffic (especially for road, bridge, box culvert, bus/truck terminal) | Improvement <input type="checkbox"/> | No-improvement <input type="checkbox"/> | Adverse <input type="checkbox"/> |
| • Safety | Improvement <input type="checkbox"/> | No-improvement <input type="checkbox"/> | Adverse <input type="checkbox"/> |
| • Employment generation | Significant <input type="checkbox"/> | Moderate <input type="checkbox"/> | Minor <input type="checkbox"/> |

3) Summary of Possible environmental impacts of the Schemes :

4) Category of Scheme : (follow Figure 2)

(a) According to ECR 1997 : Green / Orange A / Orange B / Red / Not Listed

(b) According to WB classification: Category B / Category C

5) Proposed mitigation measure (follow Attachment 7 as appropriate)

6) Overall Comments

.....

.....

Part C: Social Issues

1. Will there be a need for additional lands to carry out the indented works under this Scheme?
☐ Yes ☐ No
2. If yes, required lands presently belong to-
☐ Government (Khas, other GOB agencies, PS, Public lands); ☐ Private citizens
3. If the required lands are Public Lands, the lands are presently used for:
☐ Agriculture (No. of persons/households using the lands:) ☐ Residential
purposes (No. of households living on them:)
☐ Commercial purposes (No. of persons: No. of shops:)
4. If the required lands belong to the private citizens, the lands are presently being used *for*:
☐ Agriculture (No. of landowners/households:)
☐ Residential purposes (No. of households:)
☐ Commercial purposes (No. persons: No. of shops:)

Number of non-titled persons/households who would lose their livelihood because of eviction from public lands and/or from obtained on voluntary contribution, or other means:

.....

5. Does this Scheme affect any community groups' access to any resources that they use for livelihood? [
☐ Yes ☐ No

6. If the land belongs to Small Ethnic Group, is it

☐ Legal

☐

Customary

7. If additional lands are required, they will be obtained through:

☐ Voluntary contribution

☐ Other means (Specify):

8. Negative effects on neighborhood or community characters/behavior/norms?

☐ Yes ☐ No

Endorsed by:

Signature and Date:

Name:

Designation

Mobile:

B. SOCIAL SCREENING FORM (Sample)

A. Identification

1. Name of ULGI: District:
 Ward/Mahalla: Upazila:
2. Subproject/spot screened:

3. Project component:
4. Brief description of the physical works:

5. Screening Date(s):

B. Participation in Screening

6. Names of Consultants' representatives who screened the subproject:

7. Names of ULGI officials participated in screening:

8. WLCC members, NGOs, community groups/CBOs participated in screening: List them in separate pages with names and addresses, in terms of road sections/spots and any other information to identify them during preparation of impact mitigation plans.
9. Would-be affected persons participated in screening: List them in separate pages with names, addresses in terms of road sections/spots where they would be affected, and any other information to identify them during preparation of impact mitigation plans.

Annex 2: Details of the ECoPs

ECoP : Waste Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Waste	Soil and water pollution from the improper management of wastes and excess materials from the construction sites.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Develop waste management plan for various specific waste streams (e.g., reusable waste, flammable waste, construction debris, food waste etc.) prior to commencing of construction and submit to RSC for approval. • Organize disposal of all wastes generated during construction in an environmentally acceptable manner. This will include consideration of the nature and location of disposal site, so as to cause less environmental impact. • Minimize the production of waste materials by 3R (Reduce, Recycle and Reuse) approach. • Segregate and reuse or recycle all the wastes, wherever practical. • Maintain all construction sites in a cleaner, tidy and safe condition and provide and maintain appropriate facilities as temporary storage of all wastes before transportation and final disposal.

ECoP : Drainage Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Excavation and earth works, and construction yards	Lack of proper drainage for rainwater/liquid waste or wastewater owing to the construction activities harms environment in terms of water and soil contamination, and mosquito growth.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Prepare a program for prevent/avoid standing waters, which RSC will verify in advance and confirm during implementation • Provide alternative drainage for rainwater if the construction works/earth-fillings cut the established drainage line • Establish local drainage line with appropriate silt collector and silt screen for rainwater or wastewater connecting to the existing established drainage lines already there • Rehabilitate road drainage structures immediately if damaged by contractors' road transports. • Build new drainage lines as appropriate and required for wastewater from construction yards connecting to the available nearby recipient water bodies. Ensure wastewater quality conforms to the relevant standards provided by DoE, before it being discharged into the recipient water bodies. • Ensure the internal roads/hard surfaces in the construction yards/construction camps that generate has storm water drainage to accommodate high runoff during downpour and that there is no stagnant water in the area at the end of the downpour.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> Construct wide drains instead of deep drains to avoid sand deposition in the drains that require frequent cleaning.
Ponding of water	Health hazards due to mosquito breeding	<p>The Contractor shall</p> <ul style="list-style-type: none"> Do not allow ponding/storage of water especially near the waste storage areas and construction camps Discard all the storage containers that are capable of storing of water, after use or store them in inverted position.

ECoP : Top Soil Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Land clearing and earth works	Earthworks will impact the fertile top soils that are enriched with nutrients required for plant growth or agricultural development	<p>The Contractor shall</p> <ul style="list-style-type: none"> Strip the top soil to a depth of 15 cm and store in stock piles of height not exceeding 2m. Remove unwanted materials from top soil like grass, roots of trees and similar others. The stockpiles will be done in slopes of 2:1 to reduce surface runoff and enhance percolation through the mass of stored soil. Locate topsoil stockpiles in areas outside drainage lines and protect from erosion. Construct diversion channels and silt fences around the topsoil stockpiles to prevent erosion and loss of topsoil. Spread the topsoil to maintain the physico-chemical and biological activity of the soil. The stored top soil will be utilized for covering all disturbed area and along the proposed plantation sites Prior to the re-spreading of topsoil, the ground surface will be ripped to assist the bunding of the soil layers, water penetration and revegetation.
Transport	Vehicular movement outside ROW or temporary access roads will affect the soil fertility of the agricultural lands	<p>The Contractor shall</p> <ul style="list-style-type: none"> Limit equipment and vehicular movements to within the approved construction zone Construct temporary access tracks to cross concentrated water flow lines at right angles Plan construction access to make use, if possible, of the final road alignment Use vehicle-cleaning devices, for example, ramps or wash down areas.

ECoP : Topography and Landscaping

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Land clearing and earth works	Flood plains of the existing Project area will be affected by the construction of various	<p>The Contractor shall</p> <ul style="list-style-type: none"> Ensure the topography of the final surface of all raised lands (construction yards, approach roads, access roads, bridge end

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	project activities. Construction activities especially earthworks will change topography and disturb the natural rainwater/flood water drainage as well as will change the local landscape.	<p>facilities, etc.) are conducive to enhance natural draining of rainwater/flood water;</p> <ul style="list-style-type: none"> • Keep the final or finished surface of all the raised lands free from any kind of depression that insists water logging • Undertake mitigation measures for erosion control/prevention by grass-turfing and tree plantation, where there is a possibility of rain-cut that will change the shape of topography. • Cover immediately the uncovered open surface that has no use of construction activities with grass-cover and tree plantation to prevent soil erosion and bring improved landscaping.

ECOP : Air Quality Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Air quality can be adversely affected by vehicle exhaust emissions and combustion of fuels.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Fit vehicles with appropriate exhaust systems and emission control devices. Maintain these devices in good working condition. • Operate the vehicles in a fuel-efficient manner
Construction machinery	Air quality can be adversely affected by emissions from machinery and combustion of fuels.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Fit machinery with appropriate exhaust systems and emission control devices. Maintain these devices in good working condition in accordance with the specifications defined by their manufacturers to maximize combustion efficiency and minimize the contaminant emissions. Proof or maintenance register shall be required by the equipment suppliers and contractors/subcontractors
Construction activities	Dust generation from construction sites, material stockpiles and access roads is a nuisance in the environment and can be a health hazard.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Water the material stockpiles, access roads and bare soils on an as required basis to minimize the potential for environmental nuisance due to dust. Increase the watering frequency during periods of high risk (e.g. high winds). Stored materials such as gravel and sand shall be covered and confined to avoid their being wind-drifted • Minimize the extent and period of exposure of the bare surfaces • Reschedule earthwork activities or vegetation clearing activities, where practical, if necessary to avoid during periods of high wind and if visible dust is blowing off-site • Restore disturbed areas as soon as practicable by vegetation/grass-turfing • Store the cement in silos and minimize the emissions from silos by equipping them with filters. • Establish adequate locations for storage, mixing and loading of construction materials, in a way that dust dispersion is prevented because of such operations

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> Crushing of rocky and aggregate materials shall be wet-crushed, or performed with particle emission control systems.

ECOP : Noise and Vibration Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Noise quality will be deteriorated due to vehicular traffic	<p>The Contractor shall</p> <ul style="list-style-type: none"> Maintain all vehicles in order to keep it in good working order in accordance with manufactures maintenance procedures Make sure all drivers will comply with the traffic codes concerning maximum speed limit, driving hours, etc. Organize the loading and unloading of trucks, and handling operations for the purpose of minimizing construction noise on the work site
Construction activities	Noise and vibration may have an impact on people, property, fauna, livestock and the natural environment.	<p>The Contractor shall</p> <ul style="list-style-type: none"> Notify adjacent landholders prior any typical noise events outside of daylight hours Educate the operators of construction equipment on potential noise problems and the techniques to minimize noise emissions Employ best available work practices on-site to minimize occupational noise levels Install temporary noise control barriers where appropriate Notify affected people if major noisy activities will be undertaken, e.g. pile driving Plan activities on site and deliveries to and from site to minimize impact Monitor and analyze noise and vibration results and adjust construction practices as required. Avoid undertaking the noisiest activities, where possible, when working at night near the residential areas.

ECOP : Road Transport and Road Traffic Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Increased traffic use of road by construction vehicles will affect the movement of normal road traffics and the safety of the road-users.	<p>The Contractor shall</p> <ul style="list-style-type: none"> Prepare and submit a traffic management plan to the RSC for his approval at least 30 days before commencing work on any project component involved in traffic diversion and management. Include in the traffic management plan to ensure uninterrupted traffic movement during construction: detailed drawings of traffic arrangements showing all detours, temporary road, temporary bridges temporary diversions, necessary barricades, warning signs / lights, and road signs.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> • Provide signs at strategic locations of the roads complying with the schedules of signs contained in the Bangladesh Traffic Regulations. • Install and maintain a display board at each important road intersection on the roads to be used during construction, which shall clearly show the following information in Bangla: <ul style="list-style-type: none"> ○ Location: Village name ○ Duration of construction period ○ Period of proposed detour / alternative route ○ Suggested detour route map ○ Name and contact address/telephone number of the concerned personnel ○ Name and contact address / telephone number of the Contractor ○ Inconvenience is sincerely regretted.
	Accidents and spillage of fuels and chemicals	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Restrict truck deliveries, where practicable, to day time working hours. • Restrict the transport of oversize loads. • Operate road traffics/transport vehicles, if possible, to nonpeak periods to minimize traffic disruptions. • Enforce on-site speed limit

ECoP : Construction Camp Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Siting and Location of construction camps	Campsites for construction workers are the important locations that have significant impacts such as health and safety hazards on local resources and infrastructure of nearby communities.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Locate the construction camps at areas which are acceptable from environmental, cultural or social point of view. • Consider the location of construction camps away from communities in order to avoid social conflict in using the natural resources such as water or to avoid the possible adverse impacts of the construction camps on the surrounding communities. • Submit to the RSC for approval a detailed layout plan for the development of the construction camp showing the relative locations of all temporary buildings and facilities that are to be constructed together with the location of site roads, fuel storage areas (for use in power supply generators), solid waste management and dumping locations, and drainage facilities, prior to the development of the construction camps. • Local authorities responsible for health, religious and security shall be duly informed on the set up of camp facilities so as to maintain effective surveillance over public health, social and security matters
Construction Camp Facilities	Lack of proper infrastructure facilities, such as housing, water	<p>The Contractor shall provide the following facilities in the campsites:</p> <ul style="list-style-type: none"> • Adequate housing for all workers

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	supply and sanitation facilities will increase pressure on the local services and generate substandard living standards and health hazards.	<ul style="list-style-type: none"> • Safe and reliable water supply. • Hygienic sanitary facilities and sewerage system. The toilets and domestic waste water will be collected through a common sewerage. Provide separate latrines and bathing places for males and females with total isolation by wall or by location. The minimum number of toilet facilities required is one toilet for every ten persons.
Disposal of waste	Management of wastes is crucial to minimize impacts on the environment	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Ensure proper collection and disposal of solid wastes within the construction camps • Insist waste separation by source; organic wastes in one pot and inorganic wastes in another pot at household level. • Store inorganic wastes in a safe place within the household and clear organic wastes on daily basis to waste collector. Establish waste collection, transportation and disposal systems with the manpower and equipment/vehicles needed. • Dispose organic wastes in a designated safe place on daily basis. At the end of the day cover the organic wastes with a thin layer of sand so that flies, mosquitoes, dogs, cats, rats, are not attracted. One may dig a large hole to put organic wastes in it; take care to protect groundwater from contamination by leachate formed due to decomposition of wastes. Cover the bed of the pit with impervious layer of materials (clayey or thin concrete) to protect groundwater from contamination. • Locate the garbage pit/waste disposal site min 500 m away from the residence so that peoples are not disturbed with the odor likely to be produced from anaerobic decomposition of wastes at the waste dumping places. Encompass the waste dumping place by fencing and tree plantation to prevent children to enter and play with. • Do not establish site specific landfill sites. All solid waste will be collected and removed from the work camps and disposed in approval waste disposal sites.
Fuel supplies for cooking purposes	Illegal sourcing of fuel wood by construction workers will impact the natural flora and fauna	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Provide fuel to the construction camps for their domestic purpose, in order to discourage them to use fuel wood or other biomass. • Made available alternative fuels like natural gas or kerosene on ration to the workforce to prevent them using biomass for cooking. • Conduct awareness campaigns to educate workers on preserving the protecting the biodiversity and wildlife of the project area, and relevant government regulations and punishments on wildlife protection.
Safety	In adequate safety facilities to the construction camps may	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Provide appropriate security personnel (police / home guard or private security guards) and enclosures to prevent unauthorized entry in to the camp area.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	create security problems and fire hazards	<ul style="list-style-type: none"> • Maintain register to keep a track on a head count of persons present in the camp at any given time. • Encourage use of flameproof material for the construction of labor housing / site office. Also, ensure that these houses/rooms are of sound construction and capable of withstanding wind storms/cyclones. • Provide appropriate type of firefighting equipment suitable for the construction camps • Display emergency contact numbers clearly and prominently at strategic places in camps. • Communicate the roles and responsibilities of laborers in case of emergency in the monthly meetings with contractors
Site Restoration	Restoration of the construction camps to original condition requires demolition of construction camps.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Dismantle and remove from the site all facilities established within the construction camp including the perimeter fence and lockable gates at the completion of the construction work.

ECOP : Worker Health and Safety

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Best practices	Construction works may pose health and safety risks to the construction workers and site visitors leading to severe injuries and deaths. The population in the proximity of the construction site and the construction workers will be exposed to a number of (i) biophysical health risk factors, (e.g. noise, dust, chemicals, construction material, solid waste, waste water, vector transmitted diseases etc), (ii) risk factors resulting from human behavior (e.g. STD, HIV etc) and (iii) road accidents from construction traffic.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Implement suitable safety standards for all workers and site visitors which shall not be less than those laid down on the international standards (e.g. International Labor Office guideline on 'Safety and Health in Construction; World Bank Group's 'Environmental Health and Safety Guidelines') and contractor's own national standards or statutory regulations, in addition to complying with the national standards of the Government of Bangladesh (e.g. 'The Bangladesh Labor Code, 2006') • Provide the workers with a safe and healthy work environment, taking into account inherent risks in its particular construction activity and specific classes of hazards in the work areas, • Provide personal protection equipment (PPE) for workers, such as safety boots, helmets, masks, gloves, protective clothing, goggles, full-face eye shields, and ear protection. Maintain the PPE properly by cleaning dirty ones and replacing them with the damaged ones. • Safety procedures include provision of information, training and protective clothing to workers involved in hazardous operations and proper performance of their job • Appoint an environment, health and safety manager to look after the health and safety of the workers • Inform the local authorities responsible for health, religious and security duly informed before commencement of civil

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		works and establishment of construction camps so as to maintain effective surveillance over public health, social and security matters.
	Child and pregnant labor	The Contractor shall <ul style="list-style-type: none"> not hire children of less than 14 years of age and pregnant women or women who delivered a child within 8 preceding weeks, in accordance with the Bangladesh Labor Code, 2006
Water and sanitation facilities at the construction sites	Lack of Water sanitation facilities at construction sites cause inconvenience to the construction workers and affect their personal hygiene.	<ul style="list-style-type: none"> The contractor shall provide portable toilets at the construction sites, if about 25 people are working the whole day for a month. Location of portable facilities shall be at least 6 m away from storm drain system and surface waters. These portable toilets shall be cleaned once a day and all the sewerage shall be pumped from the collection tank once a day and shall be brought to the common septic tank for further treatment. Contractor shall provide bottled drinking water facilities to the construction workers at all the construction sites.
Trainings	Lack of awareness and basic knowledge in health care among the construction workforce, make them susceptible to potential diseases.	The Contractor shall <ul style="list-style-type: none"> Train all construction workers in basic sanitation and health care issues (e.g., how to avoid malaria and transmission of sexually transmitted infections (STI) HIV/AIDS. Train all construction workers in general health and safety matters, and on the specific hazards of their work Training shall consist of basic hazard awareness, site specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Commence the malaria, HIV/AIDS and STI education campaign before the start of the construction phase and complement it with by a strong condom marketing, increased access to condoms in the area as well as to voluntary counseling and testing. Implement malaria, HIV/AIDS and STI education campaign targeting all workers hired, international and national, female and male, skilled, semi- and unskilled occupations, at the time of recruitment and thereafter pursued throughout the construction phase on ongoing and regular basis. This shall be complemented by easy access to condoms at the workplace as well as to voluntary counseling and testing.

Annex 3: Workforce Health and Safety Under COVID-19 Pandemic in Bangladesh

(a) The PIU/ULGIs should identify measures to address the COVID-19 situation. What will be possible will depend on the context of the project activities: the location, existing resources, availability of supplies, capacity of local emergency/health services, the extent to which the virus already exist in the area. A systematic approach to planning, recognizing the challenges associated with rapidly changing circumstances, will help the project put in place the best measures possible to address the situation. PIU should refer to guidance issued by relevant authorities, both national and international (e.g. WHO). Addressing COVID-19 at a project site goes beyond occupational health and safety and is a broader project issue which will require the involvement of different members of a project management team. **Assessing Workforce Characteristics**

- Breakdown of workers temporarily hired (i.e. workers from the community), and government officials. Where possible, there should be health check before employment, as workers that may be more at risk from COVID-19, those with underlying health issues or who may be otherwise at risk.
- Consideration should be given to ways in which to minimize movement in and out of site to avoid workers returning home to affected areas.
- Consideration should be given to requiring workers lodging in the local community to move to separate lodging facility (subject to availability) where they would be subject to the same restrictions.
- Workers from local communities, who return home daily will be more difficult to manage. They should be subject to health checks regularly and at some point, circumstances may make it necessary to require them to either use accommodation on site or not to come to work.
- Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.
- Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviors required of them in enforcing such system and any COVID - 19 specific considerations.
- Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
- Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site.
- Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
- During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
- Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.
- Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.

- All rental vehicles should be parked in a secured place and no unauthorized use should be stopped until the contract is over.
- Placing posters and signs around the site, with images and text in local languages.
- Ensuring handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout site, including at entrances/exits to work areas; where there is a toilet, canteen or food distribution, or provision of drinking water; in worker accommodation; at waste stations; at stores; and in common spaces. Where handwashing facilities do not exist or are not adequate, arrangements should be made to set them up. Alcohol based sanitizer (if available, 60-95% alcohol) can also be used.
- Review worker accommodations, and assess them in light of the requirements set out in IFC/EBRD guidance on Workers' Accommodation: processes and standards, which provides valuable guidance as to good practice for accommodation.
- Setting aside part of worker accommodation for precautionary self-quarantine as well as more formal isolation of staff who may be infected.

Persons with symptoms should:

- wear a medical mask, self-isolate, and seek medical advice as soon as they start to feel unwell. Symptoms can include fever, fatigue, cough, sore throat, and difficulty breathing. It is important to note that early symptoms for some people infected with COVID-19 may be very mild;
- follow instructions on how to put on, take off, and dispose of medical masks;
- follow all additional preventive measures, in particular, hand hygiene and maintaining physical distance from other persons.

All persons should:

- avoid groups of people and enclosed, crowded spaces;
- maintain physical distance of at least 1 m from other persons, in particular from those with respiratory symptoms (e.g., coughing, sneezing);
- perform hand hygiene frequently, using an alcohol-based hand rub if hands are not visibly dirty or soap and water when hands are visibly dirty;
- cover their nose and mouth with a bent elbow or paper tissue when coughing or sneezing, dispose of the tissue immediately after use, and perform hand hygiene;
- refrain from touching their mouth, nose, and eyes.

(b) Cleaning and Waste Disposal

Conduct regular and thorough cleaning of all site facilities, including offices, accommodation, canteens, common spaces. Review cleaning protocols for key construction equipment (particularly if it is being operated by different workers). This should include:

- Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.
- Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.
- Where it is anticipated that cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, providing them with appropriate PPE: gowns or aprons, gloves, eye protection (masks, goggles or face screens) and boots or closed work shoes. If appropriate PPE is not available, cleaners should be provided with best available alternatives.
- Training cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).

-
- Any medical waste produced during the care of ill workers should be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO). If open burning and incineration of medical wastes is necessary, this should be for as limited a duration as possible. Waste should be reduced and segregated, so that only the smallest amount of waste is incinerated (for further information [see WHO interim guidance on water, sanitation and waste management for COVID-19](#)).
 - All vehicles should be cleaned thoroughly with disinfectants after returning to the parking facilities.

Disposal of Personal Protective Equipment (PPE):

The project intends to provide reusable (Cloth) masks since it can be washed and reused and waste at downstream will be less. The masks are washed daily if used for a significant period during the day. Washing can be by hand or machine wash (use warm or hot water) using normal household laundry detergent and/or color safe bleach. If PPE is exposed to infectious materials during use (e.g., body fluids from an infected person) the PPE is considered contaminated and the wearer should remove it promptly, using proper removal procedures. It is essential that used PPE is stored securely within disposable rubbish bags. Based on the PPEs quality, the PPEs need to be burnt or washed or buried. Otherwise, these bags should be placed into another bag, tied securely, marked (with date) and kept separate from other waste within the room. This should be put aside for at least 72 hours before being disposed of as normal.

(c) Local Medical and Other Services

- Given the limited scope of project medical services, the project may need to refer sick workers to local medical services. Liaise with the relevant local authorities and obtain information as to the resources and capacity of local medical services (e.g. number of beds, availability of trained staff and essential supplies).

Annex 4: Quarterly Grievance Report

Period from.....to.....2021

Project Phase:.....

Case No.	Complainant's name, gender and location	Nature of complaints and expectation of complainant	Date of Petition submitted	Method of resolution with dates	Decisions and date of communication to the complainant	Agreement with and commitment to complainant	Progress (solved/ pending)	Reason, if pending

Annex 5: Summary of Applicable Environmental, Social and Safeguards Regulations of GOB

S.No.	Policies/Act/Rules	Key provisions and purpose	Applicability to LGCRRP Project
1.	Bangladesh Environmental Conservation Act (ECA), 1995	This umbrella Act includes laws for conservation of the environment, improvement of environmental standards, and control and mitigation of environmental pollution. According to this act (Section 12), no industrial unit or project shall be established or undertaken without obtaining, in a manner prescribed by the accompanying Rules, an Environmental Clearance Certificate (ECC) from the Director General of DoE.	Yes, LGCRRP project needs NOC from the local authority and ECC from the DoE.
2.	Bangladesh Environmental Conservation Rules (ECR), 1997	The Rule 7 classifies industrial units and projects into four categories depending on environmental impact and location for the purpose of issuance of ECC. These categories are: Green, Orange A, Orange B, and Red. The ECR'97 describes the procedures for obtaining Environmental Clearance Certificates (ECC) from the Department of Environment for different types of proposed units or projects.	Yes, some of the LGCRRP interventions may be fallen under Orange B category, hence would require both IEE, ESIA and ESMP approved by the DoE and have to deposit prescribe fees according to the schedule 13 to obtain ECC.
3.	Bangladesh Environment Court Act, 2010	Bangladesh Environment Court Act, 2010 has been enacted to resolve the disputes and establishing justice over environmental and social damage raised due to any development activities.	According to this act, government can take legal actions if any environmental problem occurs due to LGCRRP interventions.
4.	The Protection and Conservation of Fish Act (1950)	This Act provides power to the government to: make and apply rules to protect fisheries; prohibit or regulate pollution to the water bodies.	Yes, as the LGCRRP includes renovation of existing buildings, operation of lab facilities, installation of equipment's, use of chemical substances, potential solid and liquid waste generation, etc. which has potential risk for water pollution and habitat alternation, if not properly managed.

S.No.	Policies/Act/Rules	Key provisions and purpose	Applicability to LGCRRP Project
5.	Protection and Conservation of Fish Rules (1985)	Section 6 states, “No person shall destroy or make any attempt to destroy any fish by poisoning of water or the depletion of fisheries by pollution, by trade effluents or otherwise in inland waters.	Yes, mostly during construction/reconstruction/ refurbishment of the buildings, and waste management.
6.	Bangladesh Wildlife (Protection and Preservation) Act 2012	The Act protects 1,307 species of plants and animals, including 32 species of amphibian, 154 species of reptile, 113 species of mammal, 52 species of fish, 32 species of coral, 137 species of mollusk, 22 species of crustacean, 24 species of insect, six species of rodent, 41 species of plant and 13 species of orchid. Of these, eight amphibian, 58 reptile, 41 bird, and 40 mammal species are listed as endangered in the IUCN Red Data Book (2000, updated in 2015).	Yes, project area might have presence of these listed threatened animals in old campuses.
7.	Bangladesh Labor Act, 2006, (as amended 2018); Bangladesh Labor Rules, 2015; and Bangladesh Child Labor Mitigation Policy, 2010	It provides the guidance of employer’s extent of responsibility and workmen’s extent of right to get compensation in case of injury by accident while working.	Yes, LGCRRP activities require labor from local and external areas.
8.	Bangladesh National Building Code, 2006	The BNBC clearly sets out the constructional responsibilities according to which the relevant authority of a particular construction site shall adopt some precautionary measures to ensure the safety of the workmen. The Code also clarifies the issue of safety of workmen during construction.	Yes, LGCRRP will include construction or renovation or expansion of existing buildings, etc.
9.	The Noise Pollution Control Rules, 2006	The Noise Pollution Control Rules have been established in order to manage noise generating activities which have the potential to impact the health and wellbeing of workers and the surrounding communities.	Yes, many activities of the project will be performed under the dense populated areas.

S.No.	Policies/Act/Rules	Key provisions and purpose	Applicability to LGCRRP Project
10.	Road Transport Act, 2018	The new Road Transport Act 2018 has finally come into effect at the start of November. After the long-standing Motor Vehicle Ordinance of 1983, the new act introduces a myriad of updated laws and adds new definitions for what constitutes an offence, with most of the fines and punishments receiving major bumps.	Yes, LGCRRP project will use vehicles, deploy drivers and operators of machineries in construction sites of existing campuses.
11.	The Water Supply and Sanitation Act (1996)	Regulates the management and control of water supply and sanitation in urban areas.	Yes, LGCRRP will include construction of water supply and sanitation facilities.
12.	The Ground Water Management Ordinance (1985)	Describes the management of ground water resources and licensing of tube wells	Yes, construction sites may require deep tube wells for meeting up water use.
13.	The Antiquities Act (1968)	Describes the preservation of cultural heritage, historic monuments and protected sites	Yes, project locations may have elements of cultural, historic and protected value.
14.	Acquisition and Requisition of Immovable Property Act, 2017	The principal legal instrument governing land acquisition in Bangladesh is the Acquisition and Requisition of Immovable Property.	No, project does not plan to acquisition or requisition of new land, but the potential sites for construction are yet not identified.
15.	Bangladesh Medical Waste Management and Processing Rules 2008	The Government of Bangladesh promulgated the Medical waste (management and processing) Rule, 2008 for processing and management of MW in Bangladesh. The environmental assessment must show whether the wastes will be disposed of following the mechanism devised by rules.	Yes, project intervention of modernization and operation of medical/health institutions may generate medical waste.
16.	Bangladesh Biosafety Guideline 2007	Biosafety guidelines are applicable to all research and development activities of modern biotechnology conducted in laboratories of the government research institutes, state enterprises, universities, international organizations located in	Yes, project intervention of modernization and operation of medical/health facilities those may use hazardous chemicals/medicines.

S.No.	Policies/Act/Rules	Key provisions and purpose	Applicability to LGCRRP Project
		Bangladesh, private companies or non-governmental organizations. It applies to laboratory and field trial, trans-boundary movement, transit, handling and use of all GMOs/LMOs that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health.	
17.	The East Bengal State Acquisition and Tenancy Act 1950 (Act XV of 1951)	The East Bengal State Acquisition and Tenancy Act 1950 (Act XV of 1951) provides the ownership of diluvion land (eroded into river) and alluvion land (accreted in situ). Land on the riverside of the AD line is public land and that on the countryside is governed by recorded ownership.	No, project does not plan to acquisition or requisition of new land, but the potential sites for construction are yet not identified.
18.	CHT (Land Acquisition) Regulation, 1958 (as amended 2019)	The Regulation replaces certain sections of the CHT 1900 Act, but it was specifically adopted to clarify the government's authority for acquisition of land on the eve of the Kaptai dam construction. In the process, it remains as the most important legal instrument for the government with regard to land acquisition in the region.	Yes, as some to the project targeted institutions are situated in the CHT area. And, project has dedicated activities involving small ethnic communities (SEC).

Annex 6: CERC Positive and Negative List

A. CERC Positive List

The positive list of works, services, non-consulting services and goods eligible for CERC component is shown in the list below. The works that will be financed under CERC will be those which do not trigger new ESS under the RISE program.

Goods

- Medical equipment and supplies
- Non-perishable foods, bottled water and containers
- Tents for advanced medical posts, temporary housing, and classroom/day-care substitution
- Equipment and supplies for temporary housing/living (gas stoves, utensils, tents, beds, sleeping bags, mattresses, blankets, hammocks, mosquito nets, kit of personal and family hygiene, etc.) and school
- Gasoline and diesel (for air, land and sea transport) and engine lubricants
- Spare parts, equipment and supplies for engines, transport, construction vehicles
- Lease of vehicles (Vans, trucks and SUVs)
- Equipment, tools, materials and supplies for search and rescue (including light motor boats and engines for transport and rescue)
- Tools and construction supplies (roofing, cement, iron, stone, blocks, etc.)
- Equipment and supplies for communications and broadcasting (radios, antennas, batteries, and cell phones)
- Water pumps and tanks for water storage
- Equipment, materials and supplies for disinfection of drinking water and repair/rehabilitate of black water collection systems
- Construction materials, equipment and industrial machinery
- Water, air, and land transport equipment, including spare parts
- Temporary toilets

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- Groundwater boreholes, cargos, equipment to allow access to affected site, storage units
 - Any other item agreed on between the World Bank and the Burrowers (as documented in an Aide- Memoire or other appropriate formal Project document)

Services and non-consulting services

- Consulting services related to emergency response including, but not limited to urgent studies and surveys necessary to determine the impact of the disaster and to serve as a baseline for the recovery and reconstruction process, and support to the implementation of emergency response activities
- Feasibility study and technical design
- Works supervision
- Technical Assistance in developing ToRs, preparing Technical Specifications and drafting tendering documents (Bidding Documents, ITQ, RFP)
- Non-consultant services including, but not limited to: drilling, aerial photographs, satellite images, maps and other similar operations, information and awareness campaigns
- Non-consultant services to deliver any of the activities described in the “Goods” section of this table (e.g., debris removal, dump trucks, drones survey)

Works

- Repair of damaged infrastructure including, but not limited to: water supply and sanitation systems, reservoirs, canals, roads, bridges and transportation systems, energy and power supply, telecommunication, and other infrastructure damaged by the event
- Re-establish of the urban and rural solid waste system, water supply and sanitation (including urban drainage)
- Repair of damaged public buildings, including schools, hospitals and administrative buildings
- Repair, restoration, rehabilitation of schools, clinics, hospitals
- Removal and disposal of debris associated with any eligible activity

Training

- Conduct necessary training related to emergency response including, but not limited to the implementation of EAP

- Training on rapid needs assessment and other related assessments

Emergency Operating Costs

- Incremental expenses should be borne by GoB source of funds for a defined period related to early recovery efforts arising as a result of the impact of an eligible emergency

B. CERC Negative List

In no case shall the activities for financing under the CERC exceed the environmental and social standards presented in the LGCRRP PAD, ESMF and RPF prepared prior to project approval. CERC activities will not trigger any new ESS. The following uses of LGCRRP resources by the CERC are prohibited:

- Activities that would lead to conversion or degradation of critical forest areas, critical natural habitats, and clearing of forests or forest ecosystems
- Activities affecting protected areas (or buffer zones thereof)
- Land reclamation (i.e., drainage of wetlands or filling of water bodies to create land)
- Land clearance and levelling in areas that are not affected by debris resulting from the eligible crisis or emergency
- River training (i.e., realignment, contraction or deepening of an existing river channel, or excavation of a new river channel)
- Activities that will result in the involuntary taking of land, relocation of households, loss of assets or access to assets that leads to loss of income sources or other means of livelihoods, and interference with households' use of land and livelihoods
- Construction of new roads, realignment of roads, or expansion of roads, or rehabilitation of roads that are currently located on communal lands but will be registered as government assets after rehabilitation
- Use of goods and equipment on lands abandoned due to social tension / conflict, or the ownership of the land is disputed or cannot be ascertained
- Use of goods and equipment to demolish or remove assets, Unless the ownership of the assets can be ascertained, owners consulted, assets valued, and losses compensated for in line with the program's RPF
- Uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor
- Uses of goods and equipment for activities that would affect indigenous peoples, unless due consultation and broad support has been documented and confirmed prior to the commencement of the activities as well as preparation of necessary mitigation and plans compliant with ESS7
- Uses of goods and equipment for military or paramilitary purposes
- Uses of goods and equipment in response to conflict, in any area with active military or armed group operations
- Activities related to returning refugees and internally displaced populations

Activities which, when being carried out, would affect, or involve the use of, water of rivers or of other bodies of water (or their tributaries) which flow through or are bordered by countries other than the Borrower/Recipient, in such a manner as to in any way adversely change the quality or quantity of water flowing to or bordering said countries.