



BBIN REGIONAL TRANSPORT AND TRADE FACILITATION PROGRAM – BANGLADESH PHASE 1

AS PART OF A MULTIPHASE PROGRAMMATIC APPROACH (MPA)

Environmental and Social Management Framework (ESMF)

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Ministry of Commerce



National Board of Revenue, Bangladesh
জাতীয় রাজস্ব বোর্ড, বাংলাদেশ



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ABBREVIATIONS

A.M.S.L	Above Mean Sea Level
ABMS	Automated Border Management System
ADB	Asian Development Bank
AIDB	Asian Infrastructure Development Bank
ARAP	Abbreviated Resettlement Action Plan
ARIPA	Acquisition and Requisition of Immovable Property Act
BBIN	Bangladesh, Bhutan, India and Nepal
BBIN Program - Bangladesh Phase 1	BBIN Regional Transport and Trade Facilitation Program - Bangladesh Phase 1
BDT	Bangladeshi Taka
BLPA	Bangladesh Land Port Authority
BMP's	Best Management Practices
BP	Bank Policy
BP	Bank Procedures
BRCP	Bangladesh Regional Connectivity Project
BTP	Bangladesh Trade Portal
BWDB	Bangladesh Water Development Board
CBO	Community Based Organization
CC	Climate Change
COVID-19	Coronavirus Disease of 2019
CPR	Common Property Resources
CSO	Civil Society Organizations
DAE	Department of Agriculture Extension
DoE	Department of Environment
DoF	Department of Forestry
EA	Environmental Assessment
ECA	Ecological Critical Area
ECA	Environmental Conservation Act
ECC	Environmental Clearance Certificate
ECR	Environment Conservation Rules
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMIS	Environmental Management Information System
EMP	Environmental Management Plan

EMU	Environmental Management Unit
ERP	Emergency Response Plan
ES	Environmental Screening
ESA	Environmental and Social Assessment
ESCoP's	Environmental and Social Code of Practices
ESCP	Environmental Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMP	Environmental and Social Management Plan
ESMU	Environment and Social Management Unit
ESR	Environmental Screening Report
ESS	Environmental and Social Standards
EU	European Union
FAA	Flood affected area
FAO	Food and Agriculture Organization
FGAP	Framework for Gender Action Plan
FGD	Focus Group Discussion
FPIC	Free, Prior and Informed Consent
GAP	Gender Action Plan
GBV	Gender Based Violence
GDP	Gross Domestic Product
GoB	Government of Bangladesh
GPN	Good Practice Note
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
ha	Hectare
HH	House Hold
HIES	Household Income and Expenditure Survey
HORMP	Human and Occupational Resource Management Procedure
IA	Information Access
ICP	Integrated Check Post
ID	Identity
IDA	International Development Association
IEE	Initial Environmental Examination
IFC	International Finance Corporation

ILO	International Labor Organization
IoL	Inventory of Loss
IP	Indigenous People
IPDP	Indigenous Peoples Development Plan
IPP	Indigenous Peoples' Plan
IPPF	Indigenous Peoples Planning Framework
IWM	Integrated Water Management
LAO	Land Acquisition Officer
LAP	Land Acquisition Plan
LGED	Local Government and Engineering Division
LGED	Local Government Engineering Department
LGI	Local Government Institution
LMP	Labour Management Procedures
LMS	Land Market Survey
LRSP	Livelihood Restoration Support Plan
M	Motorized
M&E	Monitoring and Evaluation
MCS	Monitoring, Control and Surveillance
MEF	Ministry of Economy and Finance
MIS	Management Information System
MLGRD&C	Ministry of Local Government, Rural Development and Co-operatives
MoC	Ministry of Commerce
MoEFCC	Ministry of Environment, Forest and Climate Change
MoF	Ministry of Finance
MoFA	Ministry of Foreign Affairs
MoLE	Ministry of Labor and Employment
MoLGRDC	Ministry of Local Government, Rural Development and Co-operatives
MoRTB	Ministry of Road Transport and Bridges
MoU	Memorandum of Understanding
MPA	Multi-Phased Approach
MT	Metric Tonne
NGOs	Non-Government Organizations
NOC	No Objection Certificate
NRS	National Resettlement Specialist
NTFC	National Trade Facilitation Committee

O&M	Operation and maintenance
OHS	Occupational Health and Safety
OHSM	Occupational health and safety management
OP	Operational Policy
PA	Protected Area
PAD	Project Appraisal Document
PAH	Project Affected Households
PAP's	Project Affected Persons
PCU	Program Coordination Unit
PIB	Public Information Brochure
PIU	Project Implementation Unit
PMO	Project Management Office
PMU	Project Management Unit
PPE	Personnel Protective Equipment
PPR	Project Progress Report
PRA	Participatory Rural Appraisal
PSC	Project Steering committee
PVAC	Property Valuation Advisory Committee
R&D	Research and Development
RAC	Resettlement Advisory Committee
RAP	Resettlement Action Plan
RCS	Replacement Cost Study
RHD	Roads and Highways Department
ROW	Right of Way
RPF	Resettlement Policy Framework
RTIP	Rural Transport Improvement Project
RTTF	Regional Trade and Transport Facilitation
SA	Social Assessment
SAE	Sub Assistant Engineer
SASEC	South Asia Subregional Economic Cooperation
SDE	Sub Divisional Engineer
SEA	Strategic Environmental Assessment
SEC	Small Ethnic Community
SECC	Social, Environmental and Communication Cell
SECDP	Small Ethnic Community Development Plan
SECI	Social and Environmental Circle
SEMVPP	Small and Ethnic Minorities, Vulnerable Peoples Plan

SEP	Stakeholders Engagement Plan
SIA	Social Impact Assessment
SIMP	Social Impact Management Plan
SMF	Social Management Framework
SMP	Social Management Plan
SOP	Standard Operating Procedure
TBD	To Be Determined
TDP	Tribal People Development Plan
TFA	Trade Facilitation Agreement
TIG	Technical Implementation Group
ToC	Table of Contents
ToR	Terms of Reference
TPP	Tribal People Planning
UNCED	United Nations Conference on Environment and Development
UPCC	Upazila Project Coordination Committee
USD	United States Dollar
VAT	Value-added Tax
WB	World Bank
WBG	World Bank Group

EXECUTIVE SUMMARY

The proposed World Bank-financed BBIN Regional Transport and Trade Facilitation Program will seek to address the main drivers of high cost of trade and transport in the sub-region, namely low levels of technology adoption in trade facilitation, inadequate transport and logistics infrastructure, and regulatory and procedural impediments to the cross-border movement of freight.

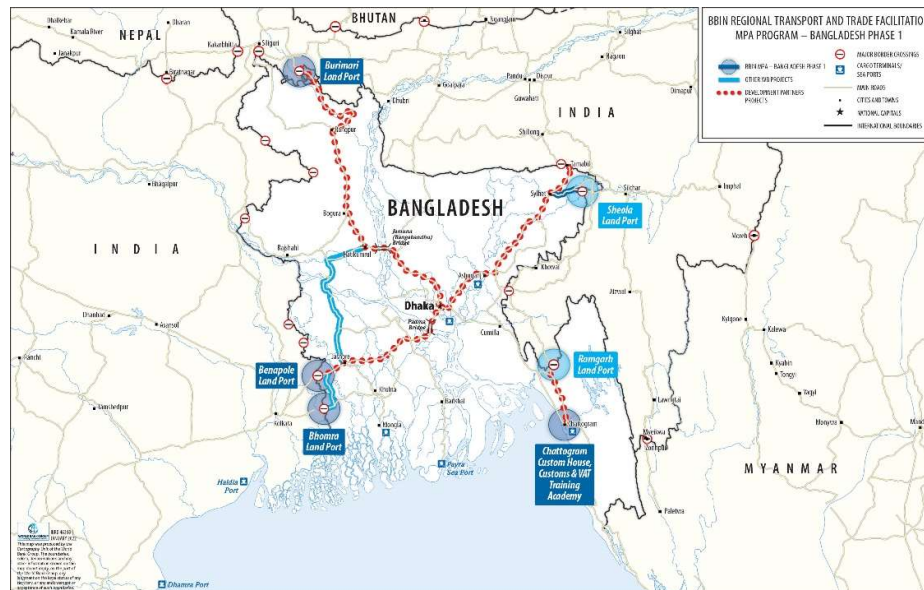
The Program Development Objective is to develop efficient and resilient regional trade and transport in the BBIN countries. The program is anchored around the following three pillars that will be common across all projects in all countries – Bangladesh, Bhutan, India and Nepal (BBIN) - under the Program.

- i. Adoption and implementation of digital and automated systems to facilitate trade;
- ii. Upgrading of regional transport infrastructure, last mile and hinterland connectivity, and modernization of priority trade gateways (land ports and customs houses); and
- iii. Technical assistance and capacity building to enable reforms required for the adoption of contemporary trade facilitation environment in the sub-region.

The Program will utilize the Multiphase Programmatic Approach (MPA), which allows a complex engagement such as regional connectivity to be structured as a series of linked operations or phases.

The ESMF covers the ‘BBIN Regional Transport and Trade Facilitation Program – Bangladesh Phase 1 (BBIN - Bangladesh Phase 1)’ which will provide an estimated US\$750million in IDA funding for Bangladesh. The proposed Project Development Objective is “to augment trade-enabling infrastructure, technology, and processes to improve the conditions for regional transport and trade in Bangladesh”.

The BBIN - Bangladesh Phase 1 will have four (04) components to be implemented by the following ministries and agencies: (1) Bangladesh Land Port Authority (BLPA), (2) National Board of Revenue (NBR), (3) Ministry of Commerce (MoC) – WTO cell, and (4) Roads and Highways Department (RHD). Location map of the major interventions are presented in the following figure:



Project Components

Component 1: Land Port Development and Border Management Improvement

Implementing Agency: Bangladesh Land Port Authority (BLPA)

Sub-component 1a: Resilient and green land port development at Benapole, Bhomra, and Burimari

This sub-component will finance the upgrading of infrastructure, systems, and processes at Benapole, Bhomra, and Burimari land ports, which are critical for trade with India, as well as with Bhutan and Nepal. Infrastructure modernization will be premised on digitalization, contact-free and paper-free processing. The investment in infrastructure will follow a comprehensive re-engineering of processes and systems and will be designed specifically to support the adoption of modern border management in order to reconcile the objectives of effective control and trade facilitation. The project will adopt a Coordinated Border Management (CBM) approach to enhance border agency collaboration and coordination (including with India), contributing to improved border management. The infrastructure will be developed as green and sustainable infrastructure with a focus on energy efficiency, waste and pollution reduction, water preservation, renewable energy, and climate resilience.

Benapole-Petrapole is the largest land border crossing in South Asia in terms of freight traffic and value of goods. The land port is located at Benapole, Sharsha, Jashore District in the southwest region of Bangladesh and handles about 80 percent of Bangladesh's total trade with India through land routes. The modernization of Benapole land port would reduce congestion and enhance capacity of truck flows from India's Petrapole Integrated Check Post (ICP). The feasibility study and detail design report for Benapole are in an early stage of development, and the exact project interventions at Benapole are not yet determined. The ESIA of the Benapole port will be prepared and disclosed as soon as the feasibility study and detail design report advance. The timing of the ESIA will be clearly mentioned in the Environmental and Social Commitment Plan (ESCP) of the Borrower.

Bhomra-Ghojadanga is the second largest land border crossing between Bangladesh and India. The land port is situated in the village of Lakhidari of Bhomra union of Satkhira Sadar Upazila in the southwest region of Bangladesh. The land port has seen increasing demand due to congestion at Benapole-Petrapole border. Demand is expected to increase with the completion of the Padma Multipurpose Bridge as Bhomra is on shortest route from Kolkata to Dhaka. The port caters for around 650 trucks per day on average which equates to a volume of more than 4 million tons of cargo per year. Traffic demand for trucks is forecasted at 1,650 per day by 2030 with the volume of goods expected to reach around 7.2 million tons per year. Like Benapole land port, the feasibility study and detail design report for Bhomra are in an early stage of preparation, and the exact project interventions are yet to be determined. The ESIA of the Bhomra port will be prepared and disclosed as soon as the feasibility study and detail design report advance. The timing of the ESIA will be clearly mentioned in the Environmental and Social Commitment Plan (ESCP) of the Borrower.

Burimari-Changrabandha is the third largest land border crossing between Bangladesh and India. The land port is situated in the Rangpur Division in northern Bangladesh. The land port caters to 140,000 trucks per year and is unable to meet increasing freight flows, leading to congestion and delays in border crossing time. This border is the designated land port for trade to and from Bhutan. The feasibility study and detail design report for Burimari land port are more advanced than for Benapole and Bhomra. The expected infrastructure interventions will include, inter alia, construction of open stack yard, international passenger terminal building, export terminal, warehouse, parking yard, truck terminals, administrative, residential and dormitory buildings, re-excavation of a dead canal adjacent to the proposed land, bank protection of river and lake, construction of two culverts to connect the existing and proposed land port. A site specific ESIA will be prepared and disclosed prior to project appraisal.

Sub-component 1b: Development of Automated Border Management System

This sub-component will support the development of a new multi-agency Automated Border Management System platform aimed at increasing visibility of the trade chain, reduce costs and unnecessary interactions with cargo shipments. This automated system is especially relevant in the context of COVID-19 where it has become imperative to reduce face to face interactions and reduce manual processes. It will seek to improve processes by BLPA and other border management partners

that fall within and, outside of the regulatory requirements (e.g., cargo handling, storage, tariff calculation, and levy payment procedures).

Sub-component 1c: Technical Assistance to enable contemporary trade facilitation practices

This sub-component will finance long-term master plans, feasibility design studies and environmental and social safeguard studies for priority land ports that will be considered for financing in subsequent MPA phases (e.g., Banglabandha, Hili, Sonahat, Bilonia, Tamabil, Bholaganj, Darshana and other land ports). Support will also be provided to build capacity of BLPA staff in modern border management practices.

Component 2: Customs Modernization

Implementing Agency: National Board of Revenue (NBR)

Sub-component 2a: Upgrading of Custom Infrastructure

This sub-component will support the upgrading of physical facilities at the Chattogram Customs House, which manages 90 percent of Bangladesh’s import and export declarations, servicing more than 7,000 traders per day. Rapidly growing trade volumes have over-burdened the existing facilities that were initially constructed in 1920. The current complex also includes a customs laboratory which tests and analyses samples of various goods intended for exports or imports. The Custom House would be modernized along with the customs laboratory in line with international good practice with strictly controlled designated areas for trader/customs official interactions and for the laboratory, with all the necessary safety protocols. The designs would reflect COVID-19 protocols aimed at reducing face to face interactions. The feasibility and design reports are under preparation. A preliminary master plan of Chattogram Customs House is presented in above figure. The construction of the Custom House Chattogram will be on government-owned land (6.77 acres) where the existing custom house is located.



Figure: Proposed Master Plan, Chattogram Customs House

Sub-component 2b: Development of Customs and Value Added Tax (VAT) Training Academy

This sub-component will support the development of a state-of-the-art Training Academy to help institutionalize NBR’s capacity building programs and allow development of e-Training modules and planned courses for continuous Human Resource Development. The construction of the Training Academy will be on government-owned land (38.68 acres) where the existing Training Academy is located.

Sub-component 2c. Technical assistance

This sub-component will support NBR to develop and implement phased implementation plan for tariff rationalization, seeking to reduce overall level of tariffs and dispersion as per the vision set out by the GoB. The sub-component is also expected to finance capacity building for the Risk Management Commissionerate, National Risk Targeting Center, Bangladesh Single Window Commissionerate, and Bonded Warehouse modernization.

Component 3: Trade Facilitation Agreement (TFA) Implementation (MoC)

Implementing Agency: Ministry of Commerce (MOC) – WTO cell

Sub-component 3a: Strengthening of the National Trade Facilitation Committee (NTFC) and development/implementation of National Trade and Transport Facilitation Action Plan

This sub-component will support establishing the NTFC Secretariat and the development and implementation of National Trade and Transport Facilitation Action Plan. The NTFC will serve as the primary trade and transport coordination mechanism in Bangladesh and will serve the functions as envisioned in the World Trade Organization (WTO) Trade Facilitation Agreement (TFA).

Sub-component 3b: Development of Decision Support System for policy analysis, trade statistics and trade negotiations

This sub-component will support a Decision Support System that will provide policy analysis, market research and trade statistics to support MoC's mandate in implementing trade policy including various trade agreements.

Sub-component 3c: Formulation and implementation of National Tariff Policy

This sub-component will support the formulation a National Tariff Policy. A concept note is being prepared with support from IFC Advisory in this regard. Necessary capacity building of officials will also be carried out for subsequent policy updating and amendments to the policy.

Sub-component 3d: Upgrading of the Bangladesh Trade Portal (BTP)

This sub-component will support the enhancement of the Bangladesh Trade Portal, which is a key element for the successful functioning of National Trade Single Window.

Sub-component 3e: Training programs on trade facilitation for women traders and entrepreneurs

This sub-component will seek to empower women traders and entrepreneurs and support their integration into national, regional and global markets through capacity building in capacity building in trade related regulatory issues.

Component 4: Regional Connectivity Infrastructure (RHD)

Implementing Agency: Roads and Highways Division

Sub-component 4a: Sylhet-Charkhai-Sheola-Sutarkandi Highway Improvement

This sub-component will upgrade the existing Sylhet - Charkhai - Sheola – Sutarkandi road (around 43km) from a two-lane single carriageway to a climate-resilient four lane dual carriageway. It will include separate service lanes for slow moving vehicles and vulnerable users on both sides of the carriageway. This road section connects Sheola Land Port at Sutarkandi with the Sylhet-Dhaka Highway (N2) which is part of Asian Highway 1 and 2. The project road is also part of a strategic regional corridor, the Bangladesh-China-India-Myanmar (BCIM) corridor which extends from (Kolkata, India to Kunming, China).

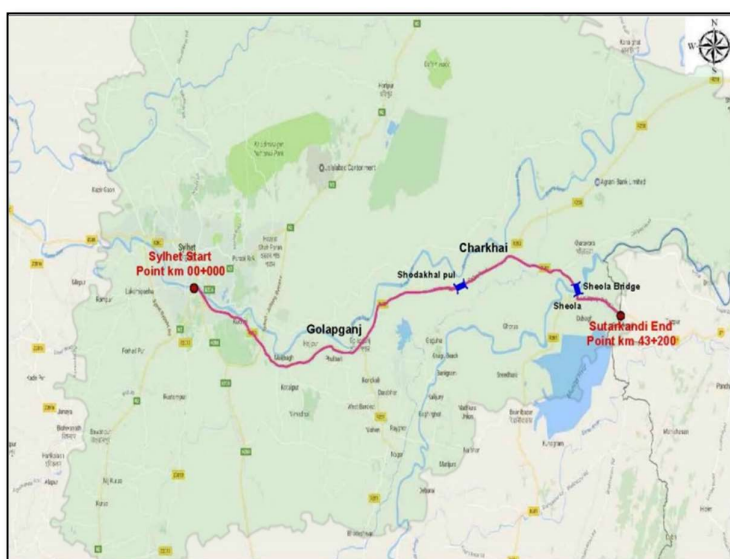


Figure: Proposed Sylhet-Charkhai-Sheila-Sutarkandi Road

Presently, the road is a two-lane carriageway of a regional category road with a width of 5.5m. The project will widen the road to a four-lane highway with international specifications and standards and 5.5 m services lane on both sides. The pavement works comprise construction of sub-grade, sub-base, base course, and surface course (binder course & wearing course). The work also includes construction of embankment, construction of flyover, underpass, and culverts.

The environmental risks and impacts are assessed to be substantial and largely manageable as the civil works will be carried out in an existing road without any environmentally sensitive receptors such as natural and critical habitats, and the construction stage environmental impacts will be temporary and limited with the proposed mitigation measures. The project area is largely agricultural. There will be issues with occupational and community health and safety during construction related to the increased number of workers and possible influx and as well as an increase in demand for construction materials and water resources and increase in air and water pollution. These issues, however, are typical in medium to large-sized construction with known engineering and housekeeping measures, which will be adopted and implemented by the project. An ESIA for Sylhet-Charkhai-Sheola-Sutarkandi Highway has been prepared and disclosed.

Sub-component 4b: Technical Assistance for regional connectivity and policy development

This sub-component will provide technical assistance to help Bangladesh's preparedness and subsequently implementation of the Bangladesh-India-Nepal Motor Vehicle Agreement (MVA). Financing will also be extended to develop a pipeline of regional connectivity transport projects through the provision of feasibility studies, detailed design and environment and social safeguard impact studies.

Scope of the ESMF

A site specific ESIA is already prepared for the Sylhet-Charkhai-Sheola road under Component 4, to be implemented by RHD. This ESMF, thus, only covers BLPA, NBR and MoC-WTO cell (Components 1, 2 and 3) for the Phase 1 components in Bangladesh as a constituent part for guidance in the implementation stage along with other required E&S documents for disclosure prior to board approval, consistent with the ESF and the GoB environmental regulatory framework. This ESMF has been prepared and disclosed covering only the Phase 1 of the MPA program, and the E&S documentations of any subsequent phases will be prepared separately. As the design and locations of the Burimari Land Port under Component 1 (BLPA) is at a more advanced level of feasibility and design, a separate ESIA is being undertaken will be disclosed by the appraisal stage. The ESIA for the Sylhet-Charkhai-Sheola-Sutarkandi Highway Improvement under the Component 4 (RHD) has been completed and is being disclosed together with this ESMF. As noted, the timing of the site-specific ESIA's for Bhomra and Benapole land ports and Chattogram Customs House and Customs and Value Added Tax (VAT) Training Academy will be mentioned in the Borrower's ESCP.

The preparation of the ESMF considered the following:

- Screening of all sub-projects, components, and activities to be implemented under the BBIN-MPA Program Phase 1 based on feasibility study initial reports to make a preliminary assessment of the potential environmental, social, labor, occupational health and safety, community safety and security (E&S) issues;
- Consideration of all applicable World Bank Environmental Social Framework (ESF) Environmental and Social Standards (ESSs) including guidelines and standards recommended in the WBG's Environmental, Health and Safety Guidelines (EHSG) and existing GoB's environmental and social standards;
- Assessment of policy implications for the proposed project activities considering WB, GoB and International laws/conventions/practices, and identify policy gaps between WB and the GoB, and suggest options for gap minimization;

- Development of a framework and guidelines for preparation of subproject specific screening, Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plans (ESMPs) (measures to reduce, mitigate and/or offset adverse risks and impacts), Resettlement Action Plans (RAPs) as relevant, to ensure compliance with local E&S laws, Good International Industry Practices (GIIP) and the WB ESF ESSs;
- Recommendations on institutional implementation and monitoring arrangement including project-specific Grievance Redress Mechanisms (GRMs);
- Conduct of stakeholder mapping and subsequent consultations to cover groups/ communities/ stakeholders to elicit their views on the proposed project and suggestions on actions and measures for inclusion in the SEP to ensure inclusion of the potential project affected persons, vulnerable and marginalized groups and ethnic communities including women in the project preparation process;
- Development of E&S capacity building plan that will include a broader E&S capacity assessment of BLPA, NBR, MoC-WTO cell and RHD which will be incorporated as action points in the Borrower's Institutional E&S capacity development plan which will be reflected in the Environmental and Social Commitment Plan (ESCP) to be an integral schedule of the Legal Agreement between the WB and GoB.
- A cost table and budget to be adopted in the project budgetary provision to ensure implementation of the ESMF and develop E&S management capacity of the partners.

Once details of the project sites are available at later stages of the project, the need for and type of E&S assessments and management plans will be reviewed, according to WB policies and GoB legislation.

Policy, Legal and Regulatory Framework

World Bank's Environmental and Social Framework (ESF)

All ESSs will be relevant to many of the program sub-components specially those involving new or significant upgrades of infrastructure. Only ESS which is not considered relevant is ESS 9 as no resources will be channeled through Financial Intermediaries. WB's legal policies for Projects on International Waterways (OP 7.50), and Project Disputed Areas (OP 7.60) are not relevant to the project. None of the sites are located on disputed territory and as well as no transboundary waterways would be affected from the project's activities. The overall environmental and social risk rating for the first phase of the Program is 'High', essentially due to social risks and impacts from land acquisition and involuntary resettlement at the Bhomra and Benapole land port and Sylhet-Sheola road. The environmental risks are assessed as 'substantial' as the civil works will be carried out on existing sites without any environmentally sensitive receptors such as natural and critical habitats. Overall, thus the environment and social impacts from the civil works are expected to be largely manageable as these are confined to the current sites. The relevant section of the ESMF discusses the relevance of ESF Policy, each of the ten standards (ESS1 to 10), and associated Directive, and their requirements. It also discusses the relevance and requirements relating to other guidance notes of the World Bank. If the requirements of Bangladesh law differ from those of ESF, the more stringent requirements will apply.

Applicable Act, Rules and Policies of the GoB

Applicable national policies, Acts and rules have been discussed in the relevant sections. The key legislations relevant for environmental assessment for BBIN-MPA program Phase 1 components are the ECA 1995 and the ECR 1997, subsequent amendments. In order to set an illustrative directive for abiding by the Act, Bangladesh Government through the ECR 1997 and its subsequent amendments, as specified in rule 7(2), lists the different types of industrial projects into four categories namely, Green, Orange A, Orange B, or Red, based on severity of its potential environmental impacts.

As per ECR 1997 amended 2010, due to the planned project interventions and the nature of activities, the BBIN-MPA program, Phase 1 in Bangladesh falls under Red category and ESIA will be required for upgrading existing inland port facilities at Benapole, Bhomra, Burimari (Component 1, BLPA); construction of several multi-storied buildings (NBR will construct a multi-storied residential building, Bungalow, office building, Multipurpose Hall, Dormitories) school building, cyclone shelters, markets, local government office building, etc.) in the residential/commercial complex area under the customs house and training academy (Component 2, NBR); and Sylhet-Charkhai-Sheola-Sutarkandi 4-Lane Highway (Component 4, RHD). It is the responsibility of the PIUs i.e. BLPA, NBR, MoC-WTO Cell and RHD to conduct ESIA in accordance with the ESMF and get Environmental Clearance Certificate (ECC) from DoE. ESIA study and Environment clearance will be obtained by the respective PIUs from the DG, Department of Environment (DoE) before any construction starts for the respective sub-projects. The environmental clearance procedure for Red 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.

Gap Analysis of World Bank Requirements and National Laws

A gap analysis between WB's ESF and GoB Regulations was conducted as part of the E&S capacity assessment of the BBIN-MPA program in light of the Overview Assessment of Bangladesh's Country Framework for Addressing Environmental Risks and Impacts of Development Projects (September 2021). The results of the gap analysis indicated the Bangladesh EIA System has a few material gaps with respect to the WB ESS1.

Foremost among these are: (i) BD national laws does not cover many of the issues relating to other WB ESSs; (ii) the stakeholder engagement during the EIA study is almost non-existent or very limited, needless to say, that there is no requirement to engage stakeholders during construction; (iii) it does not emphasize the application of mitigation hierarchy in selecting mitigation measures; (iv) it recognizes only Initial Environmental Examination (IEE) and Environmental Impact Assessment (EIA) and does not provide for other assessment instruments, particularly Strategic Environmental Assessment (SEA), Regional Environmental Assessment (REA), Cumulative Impact Assessment (CIA); and, (v) it does not require analysis of alternatives and associated facilities.

It has also a few problems of its own when compared to a standard ESIA process applied following GIIP , including but not limited to: (i) it does not provide any formal definition of the projects to be required the Environmental Clearance--the law only refers to "industry" and "industrial units"; (ii) the screening process is inadequate--there is no procedure or criteria for determining which category a project would fall into; and (iii) it does not have formal procedure for compliance monitoring and reporting.

Although there are suggestions in the EIA Guidelines on these issues, the Guidelines does not have the same compelling effect as the force of law or regulation. There is no assurance that all relevant ESSs (1-8 and 10) will be well covered in the ESIA processes and final Report including ESMPs and monitoring / supervision measures. Although GoB the EIA requirements lean heavily towards the environmental aspects, in recent years more and more social issues are being incorporated in the assessment. Moreover, the practice under normal circumstances does not include labor and OHS management issues.

Another critical gap pertains to lack of provisions for requiring the preparation of project specific ESMPs. On the social side, the eminent domain land acquisition system for example does not require the preparation of Resettlement Action Plan (RAP). There are some gaps between the existing land acquisition law of the country and ESS5 on Land Acquisition and Involuntary Resettlement in terms of identification of affected persons and compensation packages and participation of community groups of diverse interests and vulnerabilities. There are also no provisions to formulate Labor Management Procedures/Plans (LMP).

Suggested gap-filling measures are given in relevant section. These gaps are summarized in Table ES-1, this ESMF will follow the most stringent standards and requirement.

Table ES-1: Gaps Minimization between GoB laws and WB’s ESSs

WB ESF Standard	Gap Minimization
ESS-1: Assessment and Management of Environmental and Social Impacts and Risks	ESMF has suggested following the ESS-1 requirements, given in the relevant sections of environmental management procedures. In case, DoE rules/ regulations do not cover the ESS requirements, and relevant clauses should be added in the financial agreements and project appraisal document to follow the more stringent safeguard requirements according to WB ESF. ESS1 requirements will also inform the E&S requirements of the sub-project ESIAs/ESMPs and these will be used in sub-project bidding documents.
ESS-2: Labor and Working Conditions	Under this project, a LMP will be prepared to regulate working conditions and management of worker relations including workers specific GRM, terms and conditions of employment, non-discrimination and equal opportunity, protection of the workers’ rights to form unions and engage in collective bargain, protection of work force, prohibition of child/forced labor and provision of occupational health and safety (OHS) – including Covid-19 precautions and post measures.
ESS-3: Resource Efficiency and Pollution Prevention and Management	ESMP to be developed for BBIN-MPA program component 1, 2, and 4 will address this issue and incorporate mitigation measures for pollution prevention and will include guidance for efficient use of natural resources.
ESS-4: Community Health and Safety	<p>The gaps will be addressed through appropriate provisions in sub-project ESIA/ESMPs and covered in the ESMP guidance part of this ESMF. In addition, contractor, operators will be responsible to prepare and implement the Construction Environmental and Social Management Plan (C-ESMP) regarding community and occupational health and safety which includes OHS plan, traffic and road safety management plan etc. Besides, a SEA/SH has been prepared at the appraisal stage.</p> <p>Life and Fire Safety (L&FS) risks assessment and management plan for custom facilities and building, including training facilities and dormitories, will be performed as part of the ESIA/ESMP, and appropriate management plans compliant with Good International Industry Practices (GIIP) will be prepared.</p> <p>Similarly, as part of the ESIA process, a Security Risk Assessment will be prepared, and commensurate Security Management Plans will be developed for each site.</p>
ESS-5: Land Acquisition, Land Use Restriction, and Involuntary Resettlement	The project may require land acquisition from private entities. A RPF has been developed to guide preparation of site-specific RAPs/A-RAPs to address the land acquisition and involuntary resettlement and as well as physical and economic displacement related issues.
ESS-6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	A detailed guideline has been given in the ESMP preparation section of the ESMF. Besides, site-specific management plans with detailed ecological studies will be prepared for each sub-project/activity in line with WB ESF, including application of the mitigation hierarchy when potentially impacting Natural and / or Critical Habitats, and designing management measure to ensure No Net Loss (NNL) or Net Gain (NG), respectively.
ESS-7: Indigenous People	During preliminary screening of the project, no communities meeting the ESS7 criteria were identified. However, if any IPs are identified during the preparation of site-specific ESIA/ESMP, a Small Ethnic Community Development Plan (SECDP) will be prepared following the ESS7 requirements.
ESS-8: Cultural Heritage	No significant cultural heritages have been identified during the initial screening. However, further assessment will be carried out during the preparation of the site-specific ESIAs/ESMPs and in case any such cultural heritage sites are found, appropriate mitigation measures will be included in the subprojects’ ESIAs/ESMPs. This will also include a Chance Finds Procedure which will be appended to bidding and contract documents to illustrate actions to be taken on finding any cultural heritages. Efforts will also be made to identify cultural heritage in collaboration with

WB ESF Standard	Gap Minimization
	communities during the stakeholder consultation process, and avoid siting facilities on or near culturally important areas.
ESS-9: Financial Intermediaries	Not relevant.
ESS-10: Stakeholder Engagement and Information Disclosure	Under this BBIN-MPA program, a SEP has been developed for all the PIUs that identifies the various stakeholders and ways to engage them and close the feedback loop. The SEP has detailed a GRM for the PIUs to address issues and concerns for the stakeholders.

Environmental and Social Baseline

Site specific baseline information of all the sub-projects is yet to be generated by the client, except for Sylhet-Charkhai-Sheola-Sutarkandi road, as clarified above. However, preliminary investigation has been conducted during the ESMF preparation, confirming that the areas where all three land ports of BLPA and custom houses/training academy of the NBR are located can be classified as Modified Habitats where a large portion of plants and/or animals are of non-native origin and human activities have modified their natural functions and species composition.

There are no archaeological sites, sensitive cultural or biodiversity receptors of international, national, state, or district importance including protected areas, key biodiversity areas, forest areas, sacred groves, or historical/cultural monuments around the identified proposed sites or along the alignments. Homestead trees might need to be cleared in some of the proposed sites, but this impact will be minor, not related to any protected species and will be mitigated by replanting new trees at a ratio of [1:5] as noted in the ESMP section below. As the design and locations of the proposed sites proceed in more advance level, as part of the conducting ESIA for those sub-project, more in-depth E&S baseline will be developed by the clients.

Burimari Land Port: The River Dharla is located at the east side and adjacent to the proposed land for expansion of land port. A large waterbody (popularly called *dighi* in Bangla) is located at the south side of the proposed land and it serves as water basin throughout the year as it receives the rain runoffs from the surrounding areas. This *dighi* is considered artificial aquatic habitat and no birds or fish have been identified which are endangered. However, the project is not expected to have any significant impacts on the waterbody's hydrology, water quality and habitats characteristics.

Key potential impacts will be associated with minor disturbances from construction and increase traffic / dust noise, but these will be for the mostly temporary and mitigated with the application of standard practice such as traffic management plan, noise and dust abatement, awareness training to construction workers, etc. (see ESMP section below).

A dead canal from Dharla River is connected to this lake at the north and west side of the proposed land. This canal is currently fully silted and therefore no connecting flow between the river and the lake is observed throughout the year. In dry season water flow in river Dharla is minimum. In monsoon the discharge in the river is full, but no flash flood is observed due to rain. Moderate vegetation is observed at the proposed site and around the proposed land site.

Around the proposed land most trees are Bamboo bush and different type of local fruits, Mango garden, Mehuguni, Akasmuni (Acasia), Jack fruits etc. are found within 1.00 km area. There are some other minor canals and lowlands but they are fully silted up and are of no ecological or social value. There is no designated forest area owned by Forest Department of Bangladesh. There is some agricultural land within the 1.00 km around the proposed site but no cultivated land.

There is a Private College, High School, Primary School, Kinder Garden School and Madrasha are within 2.00 km around the proposed land. No aesthetic structure or site of cultural importance are within or around the project site or area of influence. Settler from different region of the country made their

resident around the project site and engaged in different ways of living, such as no ethnic group/indigenous people found in and around the project site.

Environmental and Social Risk Classification (ESRC)

The ESRC is rated high overall for reasons of substantial land acquisition and involuntary resettlement at Bhomra and Benapole land port under Component 1 and most significantly for the Sylhet road under Component 4. The environmental risk of the project (Phase 1) is rated 'substantial' as there are no significant impacts on biodiversity values or ecosystem services of importance and no impact on critical habitats or protected areas.

The third land port, Burimari, under Component 1, involves land acquisition of about 5 acres with only minor involuntary resettlement impacts. The remaining 20 acres land are government owned. The E&S risks for the Component 2 (NBR) are rated 'moderate' as no land acquisition is anticipated for both sites and also the civil works will be confined to the existing locations in an urban setting. The sub-component 2C is essentially composed of TA and rated low on E&S risks. The Component 3 under MOC (WTO Cell) involves TAs for studies, training and procurement some IT items and is also rated low as regard E&S risks.

Land Acquisition and Involuntary Resettlement

The anticipated land acquisition for BLPA under Component 1 is about 120 acres and involves involuntary resettlement related impacts on both legal landowners, informal occupants, businesses, tenants, homesteads, residential and commercial buildings, particularly in Bhomra and Benapole. Burimari land port requires 25 acres out of which only about 5 acres (with 16 HHs) will need to be acquired from private owners.

No land acquisition is anticipated for NBR under Component 2 and there are also no informal occupants. Under NBR, the proposed rehabilitation and improvement of existing infrastructure will take place within the building footprint inside the project area with no requirements of land acquisition, physical and economic displacement of the local community.

Around 313.92-acre land will be needed for the construction of the proposed road project by the RHD. Of which 176.03-acre is crop lands, 28.48-acre is commercial lands, and 31.32 acre is homestead lands. Both physically and economically total affected HHs are 4,362 with total PAPs of 17,884 individuals. This impact is not covered in this ESMF, as it is detailed in the subproject ESIA, which is being simultaneously disclosed together with the present document.

Potential Key Environmental, Social, Labor, Occupational Health and Safety, Community Health and Safety and Security (E&S) Impacts and Risks

The BBIN Program - Bangladesh Phase 1 activities and subprojects covered by this ESMF and under Components 1-3, are expected have limited E&S environmental risk and impacts given that most of the civil works are rehabilitation and improvement of existing infrastructures by BLPA and NBR or are related to capacity building, system improvements and soft interventions. Therefore, the anticipated E&S impacts and risks during construction are those typically associated to civil works such as air, noise, water and soil pollution, wastewater, solid and hazmat waste generation, as well as labor, occupational health and safety risks of workers and nearby communities.

During operations, expected E&S impacts and risks will be minor wastewater and solid / hazmat waste management issues related to operation of offices, laboratory of NBR's training academy and land port activities, including but not limited to general domestic wastewaters and solid wastes, e-wastes, laboratory hazardous wastes and spoiled perishable goods discarded by importers/exporters.

No significant impacts are anticipated on air quality nor major concerns are expected in terms of environmental or social impacts other than moderate impacts from existing activities. The labor,

occupational health and safety and security issues will also be typical of operation of these type of facilities and are expected to improve once the sub-projects are finalized and ESMP measure are implemented.

Potential environmental and social impacts of the BBIN Program – Bangladesh Phase 1 are:

- Pre-Construction Phase/Project Siting
 - Site Specific Land Cover and Land Use Changes
 - Loss of Trees
 - Loss of Habitat
 - Drainage congestion and water logging
 - Impacts on Vulnerable and disadvantage groups/communities/ individuals
- Construction Phase
 - Air Pollution
 - Noise and Vibration Pollution
 - Water Pollution (surface and ground water)
 - Impacts of Land Filling (at construction site)
 - Soil Contamination
 - Drainage congestion and water logging
 - Generation of Solid Waste and Hazardous Waste
 - Occupational Health and Safety
 - Community health and safety including SEA/SH risks
 - Impact on labor, working conditions and labor risks, including risks of child labor and forced labor, human trafficking
 - Involuntary Resettlement and Livelihood Impacts
 - Impact on Cultural Heritage
- Post Construction/Operation Phase
 - Loss of Vegetation
 - Generation of Solid Waste and Hazardous Waste
 - Noise Generation
 - Water Pollution and Drainage
 - Impacts on local livelihoods
 - Increased risk of road accidents

E&S risks and impacts associated to operations are reflected in Table ES-2. E&S impacts and risks that are particularly relevant and important are highlighted with corresponding measures to be detailed in the sub-projects ESIA/ESMPs. These are related to:

- Management of refrigeration units, hazamat cargo (e.g. fuel, chemical) and potential accidental spills.
- Dealing with labor unions in the Port Facilities;
- Community Risks related to increase containers and heavy commercial import-export traffic;
- Security Risks associated with border activities (e.g. human and illegal drugs trafficking, contraband, etc);
- Occupational and community health risks including SEA/SH; and
- Life and Fire Safety associated with offices, container storage, training facilities, and dormitories;

Under this program, there is scope of enhancement of measures in subprojects such as use of renewable energy in the new buildings, reuse of wastewater and composting of biodegradable wastes.

Sexual Exploitation and Abuse, and Sexual Harassment (SEA/ SH)

A preliminary assessment of SEA/SH risks using the Bank's SEA/SH risk assessment tool for projects with major civil works suggests a 'Moderate' SEA/SH rating for BLPA, NBR and RHD sub-project components.

This is due to the project sites being in peri-urban and urban areas which are not hard to supervise. Most of the unskilled and semi-skilled labor are expected to be locally sourced with only high skilled and some semi-skilled labor sourced from outside sub-projects' areas of influence.

However, the construction works of the proposed land ports will inevitably lead to greater mobility of peoples, which could contribute to raising a number of social problems; namely, greater exposure to communicable and sexually transmitted diseases including HIV/AIDS due to influx of outsiders such as traders, businesspersons, skilled and unskilled migrant laborers, transport workers, etc. all of which may also potentially lead to social tensions among the local communities.

Human and sex trafficking targeting girls and women is common in South Asia where immigration points at the land ports could potentially serve as conduits for cross-border trafficking. A Gender and SEA/SH Action Plan is prepared for the project that details the relevant mitigation measures both preventive and curative, and as well includes specific actions to promote gender and women empowerment.

Mitigation Measures to Address Environmental, Social, Labor, Occupational Health and Safety, Community Health and Safety and Security (E&S) Impacts and Risks

The ESMF identifies overall E&S risk and impacts for the project and provides relevant mitigation measures. More specific E&S impacts and risks associated with subprojects will be identified during the preparation of subproject-specific ESIA/ESMP. The identified E&S risks and impacts are categorized as pre-construction, construction, commissioning and operational phases along with suggested mitigation measures which will be further assessed and detailed in the site-specific ESIA/ESMP.

Good International Industry Practice (GIIP) will be applied to mitigate all identified E&S impacts and risks associated with each sub-project activity and phase and will be described in their construction (C-ESMP) and operations (O-ESMPs) Environmental, Social, Labor, Occupational Health and Safety, Community Health and Safety and Security Management Plans. A set of standard mitigation measures against the typical E&S impacts and risks expected on this program's subprojects at their different phases are proposed in the Table 5.3 of Chapter 5 and summarized in Table ES-2 below:

Table ES-2: Potential E&S Impacts and Risks and Mitigating Measures at Different Phases of the BBIN-MPA Program (Phase 1)

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
Preconstruction Phase				
Land Acquisition/ Requisition (if required)	<ul style="list-style-type: none"> ● Encroachment of agricultural land, cultural sites, fish habitat etc. ● Loss of agricultural production, fish resources; ● Loss of income and livelihoods; ● Social conflict. 	<ul style="list-style-type: none"> - Avoid agricultural land, social/religious establishments, fish habitat during finalization of the alignment of the approach road and location of the bridge; - Prior to start construction adequate compensation should be given to the PAPs in-time according to RAP. - Adequate compensation should be given for standing crops; - Avoid agricultural land, if possible; - Create job opportunities for the PAPs. 	PIU E&S consultant, RAP Implementation NGO	PIU/BBIN-MPA
Road, Office, Training Center, Housing	<ul style="list-style-type: none"> ● Loss of housing and commercial structures; ● Dust pollution; ● Loss of income and livelihoods. 	<ul style="list-style-type: none"> - Avoid the housing and commercial structure during the finalization of the alignment and location of the road/bridge; - Proper compensation shall be provided to the affected peoples prior to the construction activities. - Create job opportunities for the PAPs. 	Contractors	PIU/BBIN-MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
		<ul style="list-style-type: none"> - Water spraying on the bear surface or dust pollution source; 		
Loss of vegetation/ tree	<ul style="list-style-type: none"> ● Accident risk during removal of trees/vegetation's in the project sites; ● Birds and others species can migrate from the trees/vegetation's ; ● Impacts on the local climatic condition. 	<ul style="list-style-type: none"> - Prior to start construction, all vegetation should be removed from the proposed construction sites with the consultation of the local relevant authorities and other stakeholders; - Avoid disturbance and be careful during construction about vehicle and equipment movement; - Proper H&S measures (use of appropriate PPE such as hand gloves, safety shoes and helmet) for the workers should be taken during removal of trees, bushes & crops; - To mitigate the ecological impact, tree plantation plan can be considered in the design & accordingly tree plantation will be done in an appropriate location to be determined by the PIU/<u>BBIN</u>-RTTF1 after consultation with the concerned authority and other stakeholders; - The engineer shall approve such felling; only when the proponent secures receive a "clearance" for such felling from the PIU/<u>BBIN</u>-RTTF 1 as applicable; - Tree felling, if unavoidable, shall be done only after compensatory plantation of at least five saplings for every tree cut is done; - During the tree removal from the bridges and approaches construction sites diameter at best height of the trees is 6 inches, only such trees should be considered by the contractor for compensation and plantation; - Tree plantation at the suitable locations after completion of the construction activities at the 1:5 ratio. 	Contractors	PIU/ <u>BBIN</u> -MPA
Removal of Utilities	<ul style="list-style-type: none"> ● Risks for workers health and safety; ● During movement of heavy Construction machineries equipment's can damage the utility services if not previously removed; ● Due to carelessness or incautiousness death from sudden electric shocks may occur. 	<ul style="list-style-type: none"> - Prior to start construction, the utility services (electrical cables, telephone line, water supply pipeline, gas supply pipeline and internet line) should be shifted with the consultation of the relevant organizations; - Inform the local community before starting removal or demolishing work; - Carefully remove the utilities that are connected to any structures; - Proper Health and safety measures for the workers should be taken during shifting of these lines to avoid any incidents. 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
Archaeological/ Historical/ Social/ Cultural/ Religious Sites	<ul style="list-style-type: none"> ● Encroachment of Archaeological/ Historical/ Social/ Cultural/ Religious sites ● Air and dust pollution; ● Noise level may create uncomfort for the local community; ● Vibration can effect on social/ cultural/ religious site. 	<ul style="list-style-type: none"> - Avoid Archaeological/Historical/Social/Cultural / Religious sites during the site selection and improvement works; - Spraying water on the dry surface to reduce dust pollution; - Follow strictly the chance finds procedures - Vehicles transporting construction material to be covered; - Create noise barrier around the construction sites; - Limit the speed of vehicles; - Stop the demolition work for short time like prayer time. - Realignment of bridge approach road (in case of bridge) if required. 	Contractors	PIU/BBIN-MPA
Setting up labor camps	<ul style="list-style-type: none"> ● Land encroachment; ● Solid and liquid waste from the labor camp ● Potential community health including SEA/SH risks 	<ul style="list-style-type: none"> - Include E&S/ESMP provisions on labor, GRM, SEA/SH etc. in the bidding documents and C-ESMP/O-ESMP with payment milestones - Labor camp will follow GIIP as those described in Worker Accommodations: Process and Standards (IFC/EBRD 2006); Please see: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_work_ersaccommodation - Avoid productive land and away from the settlement during the selection of land for the setup of labor camp; - No solid and liquid waste discharge into the water bodies; - Instruct workers to maintain clean environment in the camps. - Enforce a Code of Conduct for all workers - Raise awareness among the communities on STDs, SEA/SH and the project GRM 	Contractors	PIU/BBIN-MPA
Construction Phase				
Air Pollution	<ul style="list-style-type: none"> ● Construction vehicular traffic: Air quality can be affected by vehicle exhaust emissions and combustion of fuels ● Construction equipment: Air quality can be adversely affected by emissions from construction machineries and combustion of fuels; ● Construction activities: Dust 	<ul style="list-style-type: none"> - Fit vehicles with appropriate exhaust systems and emission control devices; - Maintain vehicles and construction equipment in good working condition including regular servicing; - Operate the vehicles in a fuel-efficient manner; - Impose speed limits at 30 km/hour on vehicle movement at the worksite to reduce dust emissions; - Control the movement of construction traffic in the access road; - Focus special attention on containing the emissions from generators; - Construction equipment causing excess pollution (e.g. visible smoke) will be banned from construction sites immediately prior to usage; 	Contractors	PIU/BBIN-MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	generation from earth excavation, earth & sand stockpiles during dry period.	<ul style="list-style-type: none"> - Water spray to the dry earth/material stockpiles, access roads and bare soils as and when required 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: excavated earth, dredged soil, gravel and sand shall be covered and confined to avoid their wind drifted; - Restore disturbed areas as soon as possible by vegetation; - Establish adequate locations for storage, mixing and loading of construction materials, in a way that dust dispersion is prevented because of such operations; - The Air quality monitoring should be carried out by the contractor following the National Air Quality Standard (Schedule-2: Standards for Air Quality, ECR, 1997 and Amendment in 2005). 		
Noise Pollution	<ul style="list-style-type: none"> ● Construction vehicular traffic: Vibration and Noise quality will be deteriorated due to vehicular traffic. ● Construction equipment: Noise and vibration will have an impact on adjacent surrounding residents. ● Construction activity: Noise will have an impact on adjacent residents. 	<ul style="list-style-type: none"> - Strict measures for noise pollution control need to be undertaken during construction activities; - Create noise barrier and consider the minimum noise levels at sensitive receptor sites (e.g. dense residential area, schools, mosques, health centers etc.); - Stone breaking machine should be confined within a temporary shed so that noise pollution could be kept minimum; - Protection devices (ear plugs or ear muffs) shall be provided to the workers operating in the vicinity of high noise generating machines during construction; - Construction equipment and vehicles shall be fitted with silencers and maintained properly; - Instruction to the drivers to avoid unnecessary horn; - The Noise level monitoring should be carried out by the contractor following the National Noise Quality Standard (Schedule-4: Standards for Sound, ECR, 1997 and Noise Pollution (control) rules 2006). - Vibration monitoring should be carried out by the contractor. 	Contractors	PIU/BBIN-MPA
Ground Water Pollution	<ul style="list-style-type: none"> ● Contamination of groundwater due to Pollution lack of septic tanks or mobile toilets; ● Accidental spillage of hazardous liquid from the 	<ul style="list-style-type: none"> - - The contractor will make arrangement for water required for construction in such a way that the water availability and supply to nearby communities remain unaffected; - Handling and storage of the potential contaminants has to be organized under strict condition to avoid water pollution during construction; 	Contractors	PIU/BBIN-MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	construction camps.	<ul style="list-style-type: none"> - Handling of hazardous liquid should be done carefully by the designated experienced person; - Handling and storage of the potential contaminants should be done by the experienced workers. Proper monitoring should be done by the experienced person; - The Ground water quality monitoring should be carried out by the contractor following the National Water Quality Standard (Schedule-3: Standards for Water, ECR, 1997). 		
Surface Water Pollution	<ul style="list-style-type: none"> ● Construction & general wastes from the construction sites; ● Oil spill from the construction vehicles and construction camp can effect on fishes and aquatic wildlife (such as snakes, frogs etc.) 	<ul style="list-style-type: none"> - Contractor should prepare waste and Wastewater Management Plan and follow it properly during the construction period; - Any wastes should not be throwing into the river/khal/canal other than disposing to the designated waste dumping area; - Store the oil and petroleum product in a separate location cover by a concrete structure; - Handling of hazardous liquid should be done carefully by the designated experienced person; - Monitor the surface water by testing in designated laboratory should be done by the Contractor following the National Water Quality Standard (Schedule-3: Standards for Water, ECR, 1997). 	Contractors	PIU/ <u>BBIN</u> -MPA
Land/ Soil Pollution	<ul style="list-style-type: none"> ● Decrease the production capacity of agricultural land; ● Land or soil erosion from water or wind; ● Sediment pollution and increase the turbidity; ● Reduction the microorganism. 	<ul style="list-style-type: none"> - Avoid the productive land, agricultural land, archaeological sites, protected area, forest area, natural habitat etc.; - Land/soil quality should be ensured by the contractor to fill the abutment area and approach road; - Soil from fallow land should be used in earthwork in approach road; - Re-vegetation the exposed area as early as possible to reduce the soil erosion; - Create barrier for reducing the sedimentation into the water bodies; - The Land or soil quality test should be carried out by the contractor. 	Contractors	PIU/ <u>BBIN</u> -MPA
Waste (Solid, Liquid and Hazardous) Pollution Organic waste: remaining foods, leafs, papers, straw, fruit cover etc.	<ul style="list-style-type: none"> ● Improper storage and handling of construction & general liquid waste such as fuels, lubricants, chemicals and hazardous liquid onsite, and potential spills from these liquid materials may harm the environment and health of 	<ul style="list-style-type: none"> - The contractor will minimize the generation of sediment, oil and grease, excess nutrients, organic matter, litter, debris and any form of waste (particularly petroleum and chemical wastes); - Any wastes should not be throwing into the river/khal/canal other than dump into the designated waste dumping area; - Handling of hazardous liquid should be done carefully by the designated experienced person; - Organic waste should be managed by composting method. A concrete chamber with 3 rooms is needed to be provided. In 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
<p>Inorganic waste: Polythene, Glasses, Synthetic paper, plastic etc.</p> <p>Hazardous waste: Paint, fuel, chemicals, oil, petroleum products, bitumen etc.</p>	<p>construction workers.</p> <ul style="list-style-type: none"> ● Improper storage and handling of construction & general solid wastes. ● Improper storage and handling of 	<p>one room organic waste should be dumped and another room inorganic waste will be dumped. When the room will be filled then covered by earth. Then dump to the third room. After 6 month organic waste will be converted into fertilizer and will be used by the farmers;</p> <ul style="list-style-type: none"> – Inorganic waste should be given to the authorized vendor for free of cost for recycling; – Accidental spillage of hazardous waste should be managed by spreading wood powder on the surface of the oil and this powder mixed with oil must store in a designated concrete room; – Make sure all containers, drums and tanks that are used for storage are in good condition; – Take all precautionary measures when handling and storing fuels and lubricants, avoiding environmental pollution; – Wastewater monitoring should be carried out by the contractor, following the national standard (Schedule-10: Standard for waste from Industrial units or Projects waste). 		
Hydrological Regime	<ul style="list-style-type: none"> ● Drainage congestion and flood at the site; ● Erosion and siltation at the site. 	<ul style="list-style-type: none"> – A detailed hydrological and morphological study of the site (in case of bridge or other water related structures) should be conducted; – Proper design and construction accordingly to accommodate design flows; – Provision of sufficient sizes of drains to take design flows; – Wastes should not be disposed near any water body. All waste depending on its characteristics, should be disposed of in a controlled manner. 	Contractors	PIU/ <u>BBIN</u> -MPA
Sand Extraction/River dredging/Canal Re-excavation	<ul style="list-style-type: none"> ● Impact on river ecology ● Changes in the river morphology including erosion of banks and loss of agricultural land, etc. 	<ul style="list-style-type: none"> – Material sourcing will be thoroughly assessed in the project ESIA. – Contractors will be prohibited from opening new areas in local Rivers for extracting and/or sourcing sands, specially areas in local rivers that remain in relatively good natural conditions and areas that support fish of conservation importance. – Community adjoining local rivers will be mobilized in the monitoring of contractors. 	Contractors	PIU/ <u>BBIN</u> -MPA
Drainage Congestion	<ul style="list-style-type: none"> ● Construction of diversion road on the river/ Khal/canal create drainage congestion; 	<ul style="list-style-type: none"> – Pier of the existing bridge structures and other construction waste should be clearly removed from the construction site during dismantling of existing structure; – Construct diversion road on the river/khal/canal by keeping provision of 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	<ul style="list-style-type: none"> Stockpiling of construction materials in the river/khal/canal also create drainage congestion. 	<ul style="list-style-type: none"> open space so that water flow cannot hamper by the construction activities; – Immediately remove all the construction debris from the construction site as well as from the water bodies in a planned way; – Duration of stockpiling should be minimized as much as possible; – Avoid the encroachment of the water bodies; – Protect water bodies from sediment loads by silt screen or bubble curtains or other barrier; – Construction activity should be recommended during the dry season; – Construction workers shall be instructed to protect water resources; 		
Road Traffic and Accidents	<ul style="list-style-type: none"> Increased traffic use of narrow access road by construction vehicle will affect the movement of normal road traffics and the safety of the road users specially the students 	<ul style="list-style-type: none"> – Proper Traffic Management Plan (TMP) should be prepared by the contractor during starting of construction & follow it strictly; – In this TMP, the road safety measures such as speed breakers, warning signs/lights, road safety signs, flagman etc. should be included to ensure uninterrupted traffic; – Movement specially at nearby the educational (Schools, colleges, Madrasha etc.), community infrastructure (mosques, graveyards, Prayer Ground etc.) and health complex; – In addition, BRTA traffic rules and regulations should be strictly followed; – Divert traffic to follow alternative routes to avoid traffic jams; – All construction drivers will undergo Defensive Driving training and talking with mobile phones during driving will be forbidden. 	Contractors	PIU/BBIN-MPA
Landscape and Aesthetics	<ul style="list-style-type: none"> Excavation of borrow pits, stock piling of construction materials, placing of construction equipment and parking of construction vehicles; • Presence of construction camps, equipment and their activities; • Movement of construction vehicles on the existing road network and 	<ul style="list-style-type: none"> – Parking of construction vehicles and stockpiling of construction materials/excavated earth should be done in systematic way to avoid the damaging of aesthetics of the site; – Duration of stockpiling should be minimized as much as possible; – Vegetation plantation after completion of the construction work; – Completely remove the construction camp facilities, equipment's and their activities; – Limit the speed of the vehicles and cover the vehicles during the movement or transportation of materials on the existing road network and temporary haul road; – Plantation of trees at the construction site after completion of the construction activities immediately. 	Contractors	PIU/BBIN-MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	temporary haul roads; <ul style="list-style-type: none"> Closure of existing bridges by construction of diversion road. 			
Occupational Health and Safety	<ul style="list-style-type: none"> Campsites for construction workers and Safety are the important locations that have significant impacts such as health and safety hazards on local resources and infrastructure of nearby communities. 	<ul style="list-style-type: none"> Construction workers camp shall be located at least 500 m away from the nearest habitation and follow GIIP such as those described on Worker Accommodations: Process and Standards (IFC/EBRD 2006); Please find: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_workersaccommodation 	Contractors	PIU/BBIN-MPA
	<ul style="list-style-type: none"> Lack of proper infrastructure facilities, such as housing, water 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"> Adequate housing for all workers should be provided avoiding over crowding; Safe and reliable water supply; Hygienic sanitary facilities and sewerage system. 	Contractors	PIU/BBIN-MPA
	<ul style="list-style-type: none"> Management of wastes is crucial to minimize impacts on the environment. 	<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 container and inorganic wastes in another container at sources; Dispose organic wastes in a designated safe place on daily basis; The organic wastes should be always covered with a thin layer of sand so that flies, mosquitoes, dogs, cats, rats, etc. are not attracted; Locate the garbage pit/waste disposal site minimum 500m away from the resident area so that people are not disturbed with the odor likely to be produced from anaerobic decomposition of wastes at the waste dumping places. 	Contractors	PIU/BBIN-MPA
	<ul style="list-style-type: none"> Risks of diseases to be transmitted including malaria, exacerbated by inadequate health and safety 	<ul style="list-style-type: none"> Provide adequate health care and sanitation facilities within the construction sites; Train all construction workers in basic sanitation and health care issues and safety matters and on the specific hazards of their work; 	Contractors	PIU/BBIN-MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	<p>practices.</p> <ul style="list-style-type: none"> ● Risk of work crews spreading sexually transmitted infections and HIV/ AIDS. 	<ul style="list-style-type: none"> – Provide HIV awareness programming, including STI (sexually transmitted infections) and HIV information, education and communication for all workers on regular basis; – Covid-19 protocols will be adopted by contractors and all IAs – Regular mosquito repellent spraying during monsoon periods. 		
	<ul style="list-style-type: none"> ● Health and safety risks to the construction workers and site visitors leading to severe injuries and deaths. 	<ul style="list-style-type: none"> – Develop detailed OHS Management Plan for each site which shall include, but not be limited to: <ul style="list-style-type: none"> – Task-specific risks assessments; – Standard Operating Procedures (SOPs) associated with each task which will include capacity / skill requirements as well as required Personal Protection Equipment associated with the task; – Daily 10 minute safety talks to every working crew for awareness and refreshing of the OHS risks associated with the tasks to be performed as well as procedures / chain of command in case of incidents or accidents; – Key Performance Indicators (KPI) tracking man-hours without incidents and an objective of zero tolerance / zero fatalities; – Periodic Safety Audit / Inspections; and – Permanent capacity building for workers. – Provide the workers a safe and healthy work environment; – Provide appropriate 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; – 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 before commencement of civil works and establishment of construction camps so as to maintain effective surveillance over public health, social and security matters. – Prepare and enforce a Life and Fire Safety protocols consistent with GIIP as part of the C-ESMP. 	Contractors	PIU/ <u>BBIN</u> -MPA
	<ul style="list-style-type: none"> ● Lack of first aid facilities and health care facilities in the 	<ul style="list-style-type: none"> – Provide health care facilities and first aid facilities are readily available; 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	immediate vicinity will aggravate the health conditions of the victim.	<ul style="list-style-type: none"> - Document and report occupational accidents, diseases, and incidents and actions taken; - Identify potential hazards to workers, particularly those that may be life threatening and provide necessary preventive and protective measures; - Provide awareness to the construction drivers to strictly follow the driving rules; - Provide adequate lighting in the construction area and along the roads in the construction site. 		
Community Health and Safety	<ul style="list-style-type: none"> ● Accidents on the approach road and construction site; ● Noise and dust pollution; ● Communicable diseases can spread among the local community. ● Risk of SEA/SH 	<ul style="list-style-type: none"> - Include the related E&S provisions in the C-ESMP/O-ESMP with payment milestones. - Prior to start the construction activities contractor will be informed the local community; - Instruct the drivers and limit the speed of the vehicles; - Regular health checkup of the workers and awareness training about the communicable diseases; - Proper lighting at the project site during the night time; - Avoid unnecessary noise pollution; - Spraying water in the dry surface to reduce the dust pollution - Provide proper access control to the project site and unauthorized entry to the project site will be controlled by deploying security personnel. - Enforce a Code of Conduct for all the workers - Set up and run a SEA/SH compliant GRM - Raise awareness among the workers, communities and stakeholders on SEA/SH and the project GRM 	Contractors	PIU/BBIN- MPA
Operation Phase				
Air Pollution	<ul style="list-style-type: none"> ● Dust emission from the increasing number of vehicles in the site area; ● Vehicular emission from burning fuels. 	<ul style="list-style-type: none"> - Establish the speed breaker to limit the speed of the vehicle near the site; - Strictly follow the BRTA rules and regulations; - Increase number of plantation by adding new species of trees on the appropriate locations after consultation with the concern authority. 	BLPA and NBR	Relevant Ministries with the assistance of DoE
Surface Water Pollution	<ul style="list-style-type: none"> ● Remaining construction materials may be washed by the rainfall into the water sources and lead to sedimentation and increase turbidity; 	<ul style="list-style-type: none"> - Remaining construction materials will be completely removed from the proposed project site after completing of the construction activities; - Cover the bare surface by plantation of trees/vegetation to reduce the surface soil erosion; - Speed control measures close to the site to reduce the occurrence of accidents; 	BLPA and NBR	Relevant Ministries with the assistance of DoE

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	<ul style="list-style-type: none"> ● Hazardous materials spilled by accidents; ● Soil erosion during rainy season can contaminate nearby surface water. ● 	<ul style="list-style-type: none"> - Bank protection work can be done at the site; - Avoid rainy season for continuing any development activities. - Permanent maintenance and clean up of drainage works, specially prior to monsoon to remove potential road trash and other pollutants that could be washed down with heavy rains or cause clogging. 		
Ground Water Pollution	<ul style="list-style-type: none"> ● Accidental spillage of hazardous chemicals and materials. 	<ul style="list-style-type: none"> - EPR Plan, including contingency plans in case of accident spills. - Well defined area within Ports for isolation of leaky cargo, including a SOP for containment compliant with GIIP. - Speed control measures close to the site to reduce the occurrence of accidents; - Inform to the concern authority to take necessary action to reduce the contamination of groundwater. 	BLPA and NBR	Relevant Ministries with the assistance of DoE
Hydrology and Flood pattern	<ul style="list-style-type: none"> ● Increase flood/ water logging/ drainage condition; ● Encourage for erosion and siltation. 	<ul style="list-style-type: none"> - From planning stage and site selection local hydrology and flooding level will be considered which will need to be followed at the operation stage; - Vertical navigation clearance should be kept in design and planning at the operation stage; - A separate and details hydro-morphological study should be conducted before starting construction activities; - Site should be clean properly after completion of the construction activities so that the natural drainage system may not hampered. 	BLPA and NBR	Relevant Ministries with the assistance of DoE
Noise Pollution	<ul style="list-style-type: none"> ● Faulty engine and hydraulic horn may increase the noise level. 	<ul style="list-style-type: none"> - Ensure a designated area for traffic waiting to clear customs, with adequate noise abatement to avoid nuances to potential nearby receptors. - Noise will be periodically monitored through the facilities' perimeter and at sensitive receptors. - Necessary instruction for the drivers; - Establishment of signboard near the sensitive receptors like mosques, schools, temple, bazar etc. 	BLPA and NBR	Relevant Ministries with the assistance of DoE
Flora and Fauna	<ul style="list-style-type: none"> ● Dust will hinder vegetation growth; ● Increase number of death of wildlife and collision with the vehicles; ● Avifauna will be affected by the movement of vehicles; ● Fish and other aquatic animals will be affected. 	<ul style="list-style-type: none"> - Re-plantation of various suitable local trees can be done on the slopes of the roads or the suitable locations around the project site; - Establish monitoring system to avoid road kills of animals from traffic at the nearby port connecting roads; movement in the port areas - No disturbance for aquatic animal and keeps provision for the fish and other aquatic animals movement; - Diversion road should be removed properly as soon as possible; 	BLPA and NBR	Relevant Ministries with the assistance of DoE

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
		<ul style="list-style-type: none"> - Construction workers shall be instructed to protect natural resources, flora and fauna, including wild animals; - Natural river/khal/canal will be reinstated after completion of construction works; - Fingerling (fish) can be released to the river/khal/canal near the waterbodies/rivers/canals to the sites to boost up the fish resources. 		
Landscape and Aesthetics	<ul style="list-style-type: none"> ● Land use of the proposed project area will be changed; ● Improper removal of construction camp facilities and other construction waste will affect landscape and aesthetics. 	<ul style="list-style-type: none"> - Tree/vegetation plantation at the suitable site; - Proper removal of construction camp facilities and construction wastes from the site after completion of the works; - Excavated borrow pit area will be properly managed by the contractor, it will be preferred to use dredging materials after quality testing, so that it doesn't left off blank at the operation stage. 	BLPA and NBR	Relevant Ministries with the assistance of DoE
Management of refrigeration units, hazardous materials and cargo	<ul style="list-style-type: none"> ● Lack of related safety and security protocols and skilled personnel 	<ul style="list-style-type: none"> - Ensure strict protocols with appropriate equipment - Place the hazardous materials and cargo in a contained place away from the normal materials/cargos and ensure that the place is designed with appropriate civil and structural engineering 	BLPA and NBR	Relevant Ministries with the assistance of DoE
Labor unions and labor rights	<ul style="list-style-type: none"> ● Lack of proper enforcement of the government's labor rights/rules 	<ul style="list-style-type: none"> - Labor Management Procedures to be enforced guaranteeing freedom of association and collective bargain, no discrimination and compliance with the relevant ILO Conventions including honoring the Fundamental Principles and Rights at Work 	BLPA and NBR	Relevant Ministries with the assistance of DoE
Community health and safety	<ul style="list-style-type: none"> * Accidents on the approach road and construction site; *Noise and dust pollution; *Communicable diseases can spread among the local community. *Risk of SEA/SH *Risk of human trafficking 	<ul style="list-style-type: none"> - Enforce and traffic management plan and instruct the drivers and limit the speed of the vehicles; - Regular health checkup of the workers and awareness training about the communicable diseases; - Proper lighting at the project site during the night time; - Avoid unnecessary noise pollution; - Spraying water in the dry surface to reduce the dust pollution - Provide proper access control to the project site and unauthorized entry to the project site will be controlled by deploying security personnel. - Enforce a Code of Conduct for all the workers including the security personnel and set up and run a SEA/SH compliant GRM - Raise awareness among the workers, communities and stakeholders on SEA/SH and the project GRM - Run an inter-agency coordination and collaboration platform/framework with 	BLPA and NBR	Relevant Ministries with the assistance of Police

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
		police on potential human and drug trafficking		
Occupational Health and Safety	<ul style="list-style-type: none"> • Lack of proper infrastructure facilities, such as housing, water 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"> – Adequate housing for all workers should be provided avoiding over crowding; – Safe and reliable water supply; – Hygienic sanitary facilities and sewerage system. 	BLPA and NBR	Relevant Ministries
	<ul style="list-style-type: none"> • Management of wastes is crucial to minimize impacts on the environment. 	<ul style="list-style-type: none"> – Ensure proper collection and disposal of solid wastes within premises – Insist waste separation by source; organic wastes in one container and inorganic wastes in another container at sources; – Dispose organic wastes in a designated safe place on daily basis; – The organic wastes should be always covered with a thin layer of sand so that flies, mosquitoes, dogs, cats, rats, etc. are not attracted; – Locate the garbage pit/waste disposal site minimum 500m away from the resident area so that people are not disturbed with the odor likely to be produced from anaerobic decomposition of wastes at the waste dumping places. 	BLPA and NBR	Relevant ministries
	<ul style="list-style-type: none"> • Risks of diseases to be transmitted including malaria, exacerbated by inadequate health and safety practices. • Risk of work crews spreading sexually transmitted infections and HIV/ AIDS. 	<ul style="list-style-type: none"> – Provide adequate health care and sanitation facilities within the construction sites; – Train all construction workers in basic sanitation and health care issues and safety matters and on the specific hazards of their work; – Provide HIV awareness programming, including STI (sexually transmitted infections) and HIV information, education and communication for all workers on regular basis; – Covid-19 protocols will be adopted by contractors and all IAs – Regular mosquito repellent spraying during monsoon periods. – 	BLPA and NBR	Relevant Ministries
	<ul style="list-style-type: none"> • Health and safety risks to the construction workers and site visitors leading to severe injuries and deaths. 	<ul style="list-style-type: none"> – Develop detailed OHS Management Plan for each site which shall include, but not be limited to: <ul style="list-style-type: none"> – Task-specific risks assessments; – Standard Operating Procedures (SOPs) associated with each task which will include capacity / skill requirements as well as required 	BLPA and NBR	Relevant ministries

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
		<ul style="list-style-type: none"> Personal Protection Equipment associated with the task; - Daily 10 minute safety talks to every working crew for awareness and refreshing of the OHS risks associated with the tasks to be performed as well as procedures / chain of command in case of incidents or accidents; - Key Performance Indicators (KPI) tracking man-hours without incidents and an objective of zero tolerance / zero fatalities; - Periodic Safety Audit / Inspections; and - Permanent capacity building for workers. - Provide the workers a safe and healthy work environment; - Provide appropriate 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; - Appoint an environment, health and safety manager to look after the health and safety of the workers; - Prepare and enforce a Life and Fire Safety protocols consistent with GIIP 		
	<ul style="list-style-type: none"> ● Lack of first aid facilities and health care facilities in the immediate vicinity will aggravate the health conditions of the victim. 	<ul style="list-style-type: none"> - Provide health care facilities and first aid facilities are readily available; - Document and report occupational accidents, diseases, and incidents and actions taken; - Identify potential hazards to workers, particularly those that may be life threatening and provide necessary preventive and protective measures; - Provide awareness to the drivers to strictly follow the driving rules; - Provide adequate lighting in the premises and along the roads in the construction site 	BLPA and NBR	Relevant Ministries

Environmental Codes of Practice (ECoPs)

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

Stakeholders Engagement and Consultations

A detail Stakeholder Engagement Plan is prepared by the appraisal and will be followed throughout the project life cycle. The SEP identifies the “project affected parties”, “other interested parties” and the “vulnerable and disadvantaged groups” specific to all 4 IAs (BLPA, NBR, MOC and RHD) of the project and includes the relevant provisions to engage all the stakeholders from the inception to the project to all through the project cycle, till completion and post-construction/operational phase.

The SEP will be considered as living document and will be revised as necessary if the changing project context requires so with clearance from the Bank. Finally, the SEPs elaborate a project-specific GRM for all the 4 IAs.

Both in person and virtual consultations were carried out to develop this ESMF, the latter considering the ongoing COVID-19 situation in Bangladesh. As part of the ESMF, three (03) stakeholder consultations were carried out by BLPA, NBR, MoC [and RHD] in different days; two online, and two in person meetings at the Custom House, Chittagong and at the Land Port Authority Office, Burimari, Satkhira.

Grievance Redress Mechanism

All four implementing agencies (IAs); NBR, MoC, RHD and BLPA will establish and run a GRM for redressal of the project-specific grievances that may potentially rise in the project cycle. The GRM will be 2 tiers; site level, and PIU level with a Grievance Redress Committee (GRC) at each level. Members of the GRCs will include women and PAPs. Training will be provided to the staffs who will work on managing the grievances.

The GRMs will also be equipped to deal with labor and SEA/SH related grievances. Any SEA/SH related complaints will be handled following a survivor-centric approach with confidentiality in line with the World Bank guidelines provided in the WB good practice note on gender-based violence.

Information on the GRM will be widely disseminated among the PAPs and wider stakeholders including at site levels. The GRM will be accessible to all and all grievances will be resolved within a settled time period not exceeding 14 days. All proceeding of grievance resolution will be duly recorded and reported to the stakeholders and the Bank by each IA.

Information Disclosure

All E&S related documents and information of the program and sub-projects will be disclosed in English and the local languages by the implementing agencies on their website and hard copies will be made available at project office throughout the project life cycle. Given the ‘high’ overall E&S rating of the program, the ESIA of the Sylhet-Charkhai-Sheola highway along with the ESMF focusing on the 3 other IAs/Components are disclosed by the IAs and on the external website of the World Bank. In addition, the following are some of the other E&S instruments that are being developed and will be disclosed before appraisal together with the Appraisal Environmental and Social Review Summary (A-ESRS):

- Environmental and Social Commitment Plan (ESCP).
- Stakeholder Engagement Plan (SEP) with a Grievance Redress Mechanism (GRM);
- Labor Management Procedures (LMP) with labor specific GRM;
- Resettlement Policy Framework (RPF); and
- ESIA of the Burimari Land Port;

The mechanism of information disclosure dissemination will be simple and be accessible to all. Two of the important means that have been followed until now include briefing material and organization of community consultation sessions. The briefing material (all to be prepared in local language i.e. *Bangla*) can be in the form of (a) brochures (including project information, details of entitlements including compensation and assistance to be given to the PAPs; grievance mechanism) that can be kept in the offices of local government (union parishad office) and project office; (b) posters to be displayed at prominent locations and (c) leaflets that can be distributed in the project areas. Consultation meetings

should also be organized at regular intervals by the project to acquaint the communities, target group beneficiaries and affected persons of the following:

- Timeline and progress of the program and sub-project by components;
- Information on beneficiary participation;
- Information of involuntary displacement, compensation and entitlements;
- Sub-project E&S risks and impacts

Information disclosure procedures are mandated to provide citizen centric information as well as all documentation necessary for addressing any queries. Disclosure of information will enhance governance and accountability specifically with respect to strengthening of monitoring indicators to help the World Bank monitor compliance with the agreements and assess impact on outcomes.

Borrower's Institutional Capacity Assessment

The Bangladesh Land Port Authority (BLPA), National Board of Revenue (NBR) and the Ministry of Commerce (MOC WTO Cell) will implement component 1; component 2 and component 3 respectively. All three implementing agencies (IAs) are currently implementing the Bank-funded Bangladesh Regional Connectivity Project (BRCP), using the Bank's safeguards policies as guiding frameworks. All IAs have experience in implementing Bank-funded projects and are familiar with the Bank's financial management, procurement and environment and social safeguards policies and have adequate institutional knowledge of institutional E&S risk management.

However, the proposed project will be the first under ESF for these three IAs¹, , suggesting the need for upfront technical support to the project teams towards adequate assessment and management of environmental and social impacts of the program. All four IAs have Project Implementation Units (PIUs) with dedicated E&S specialist by BLPA. However, in general, all the IAs will require further institutional E&S risk management capacity building given the expanded scope of E&S management under ESF.

Further, given the duration of the Program, potentially spanning over 10-12 years, scope of setting up an institutional E&S Risk Management Unit will be explored at BLPA in Bangladesh. For subprojects that involve resettlement of people or displacement of their livelihoods, an employee with expertise and adequate rank will be assigned responsibility for coordination of the RAP and ESF implementation, and best efforts will be used to seek support from qualified NGOs on the implementation of the resettlement plan and income restoration activities.

In order to strengthen the existing institutional capacity of BLPA, NBR and MoC for E&S impact and risk management, the program will develop and implement relevant E&S systems and measures. Each of the Project Implementing Units (PIU) will include a Social, Environmental and Communication Cell headed by a Deputy Director which will be staffed by qualified specialists (consultants). The PIUs/IAs will also engage project supervision consultants (PSC) to supervise the contractors including their execution of construction-related ESMPs and ECoPs. The E&S Specialist within the E&S Cell will assist the PIUs/IAs on issues related to E&S management, including overseeing the PSC and contractors with respect to environmental and social risks, orientating contractors and field staff to C-ESMP and O-ESMP requirements, reviewing PSC monthly monitoring reports, and compiling required monitoring reports on ESMP compliance for the Project Director and the World Bank throughout the implementation period.

Capacity Building Plan of the IAs

Capacity building for effective implementation of the ESSs requirements is a key element of the ESIA/ESMP and will need to be carried out at all tiers of the project, including IAs (NBR, BLPA, MOC), Project Management Consultant (PMC), and contractors. PMC will take the lead in implementing the

¹ Only RHD – not covered under this ESMF – is currently implementing the Bank-funded WECARE MPA program under ESF.

capacity building plan at the construction site, though the contractors will also be responsible for conducting training for their own staff and workers.

The various aspects that are covered under the capacity building will include general E&S awareness, key environmental and social sensitivities of the area, key E&S impacts and risks of the program and sub-projects, and ESMPs requirements. All staff in the PIUs will receive training and capacity support from the PMC specialists to ensure learning and development and smooth and effective implementation of the C-ESMP, O-ESMP and any RAP.

Training shall be imparted periodically to IAs (NBR, BLPA, MOC) officials and Staff on Environmental and Social Issues. This includes an introduction to the Bank’s ESF along with related environmental, social, labor, occupational health and safety, community health and safety and security management aspects (e.g. OHS, Road Safety Management, GRM, Hazardous Waste Management, Stakeholder Engagement, Gender and SEA/SH, Security Management, L&FS, Traffic Management, Land Acquisition and Involuntary Resettlement, among others). The IAs/PIUs will also engage third-party resources for capacity building as relevant/required.

ESMP Implementation Cost

Cost estimates will need to be prepared for all the mitigation and monitoring measures to be proposed in subproject specific ESIA in accordance with the ESMF. The cost estimates for some of the mitigation measures identified in the C-ESMPs will be part of the civil works contract. Some of the suggested activities from ESIA will be implemented by hiring NGO/consulting firm for some specific IAs. Land Acquisition and Resettlement / Livelihood Restoration costs are excluded and the budget will come from client’s own resources.

The following budget is the sum of the cost that would be incurred for E&S personnel of the PIUs, E&S training and capacity building, ESMP implementation, E&S monitoring, Communications (materials and campaign), OHS Materials (e.g. PEP, Mask/ Disinfectant Spray/ Handwash etc.), etc.

The Development Project Proposal (DPP)/Technical Assistance Project Proposal (TAPP) of BLPA/NBR/MoC for the proposed program should reflect the ESMP activities with budget for successful environmental and social management of the program. Total US\$ 1.13 million is estimated for implementation of ESMF which should be embedded in the proposed total project budget from IDA.

MOC

SI	Expert’s Position	Remuneration	
		Monthly	Annually
	Gender Specialist (01)	450,000	5,400,000
	Environmental and Social Development/Stakeholder Engagement Specialist	450,000	5,400,000
Total (BDT)			10,800,000
Total (USD)			127,059

NBR

SI	Expert’s Position	Remuneration	
		Monthly	Annually
	Environmental Expert (01)	450,000	5,400,000
	Social Development and SE Expert (01)	450,000	5,400,000
	OHS and Labor Management Expert (01)	450,000	5,400,000
	Gender and SEA/SH Expert (01)	450,000	5,400,000
	Lab Analyst	200,000	2,400,000
	Lab Technician	150,000	1,800,000

Total (BDT)	25,800,000
Total (USD)	303,529

BLPA

SI	Expert's Position	Remuneration	
		Monthly	Annually
	OHS and Labor Management Expert (01)	450,000	5,400,000
	Land Acquisition and Resettlement Expert (01)	450000	5,400,000
	Environmental Expert	450000	5,400,000
	Gender and SEA/SH Expert	450000	5,400,000
	Social Development and Stakeholder Engagement Expert	450000	5,400,000
Total (BDT)		27,000,000	
Total (USD)		317,647	

(1 USD= 85 BDT)

[Salaries including Tax and VAT] TOTAL: BDT 63,600,000 [USD 748235]

Training/ Seminar

Seminar Topic/ Training Module	Budget			Time Frame
	BLPA [3 Ports]	NBR	MOC	
Introduction to World Bank ESF	1,500,000	500,000	500,000	Year 1
Labor and working conditions and OHS	1,500,000	500,000	500,000	Year 1
Community health and safety	1,500,000	500,000	0	Year 1
Grievance Redress Mechanism	1,500,000	500,000	0	Year 1
Stakeholder Engagement	1,500,000	500,000	500000	Year 1
Gender and SEA/SH/GBV	1,500,000	500,000	500000	Year 1
Review of RPF and RAP	900,000	0	0	Year 2
ESMP compliance monitoring	600,000	100,000	0	Annually
RAP compliance monitoring	600,000	0	0	Annually
OCHS and Labor Management audit	600,000	100,000	0	Annually
Contract and Consultant Management Module	600,000	100,000	100,000	Year 1
Safe Chemical and Laboratory Management	1,000,000	500,000	0	Year 1
Advanced Laboratory Techniques and Instruments Handling	2,000,000	500,000	0	Year 1
TOTAL (BDT)	15,300,000	4,300,000	2,100,000	21,700,000
TOTAL (USD)	180,000	50,588	24,706	255,266
Other Items	Budget			Time Frame
	BLPA	NBR	MOC	
Travel	600,000	100,000	0	Periodically
E&S Monitoring and Reporting	600,000	100,000	0	Periodically
Studies (lumpsum)	500,000	200,000	100,000	Annually
Communications (materials and campaign)	1,500,000	500,000	500,000	Bi-annually
OHS Materials (e.g. Mask/ Disinfectant Spray/ Handwash etc.)	1,500,000	500,000	500,000	Annually
TOTAL (BDT)	4,700,000	1,400,000	1,100,000	720,0000

Seminar Topic/ Training Module	Budget			Time Frame
	BLPA [3 Ports]	NBR	MOC	
TOTAL (USD)	55,294	16,471	12,941	84706

(1 USD= 85 BDT)

Conclusion

All the sites under the project are extension or upgrading of the existing infrastructures. The activities will be carried out on the current E&S footprints and hence, essentially are located on highly modified habitat which are already subjected to the foreseen E&S impacts and risks. Most concerning impacts and risks relate to social aspects such as resettlement and economic displacement, potential labor conflicts due to operating with a heavily unionized workforce, and security issues related to port operations in international borders. All other potential environmental, social, labor, occupational health and safety, impacts and risks are limited and incremental to existing ones and can be managed by applying standard GIIP and the relevant provisions in the ESMPs in compliance with the Bank's ESF and Bangladeshi laws.

1. INTRODUCTION

1.1 Background

The World Bank is preparing a regional connectivity program for the BBIN sub-region. The proposed program, which utilizes the Multiphase Programmatic Approach (MPA), will seek to address the main drivers of high cost of trade and transport, namely low levels of technology adoption in trade facilitation, inadequate transport and logistics infrastructure, and policy, regulatory, and procedural impediments that constrain the cross-border movement of freight.

1.1.1 BBIN MPA Program in Bangladesh (Phase 1)

The MPA will help Bangladesh in modernizing regional transportation and trade infrastructure, systems, and procedures. The Project would fund infrastructure at the Benapole, Bhomra, Burimari Land Ports, custom house and training academy at Chattogram and the widening of the current Sheola – Sylhet road into 4-lane highway for better connectivity. Custom houses at Benapole and Dhaka Airport may also be considered for inclusion in the Project. The infrastructure will be built on digitization, contactless, and paperless processing principles. In addition, the project will assist in creating an automated border management system, procedural, regulatory, and legislative reforms, and accompanying capacity-building support in enabling modern trade facilitation practices. The Project will improve efficiency, climate resilience and safety of movement of goods and people along the corridor.

In Bangladesh, the Phase 1 of the Program (Project) will have 4 components with as many implementing agencies, as following-

- Component 1: Land Port Development and Border Management Improvement (BLPA)
- Component 2: Customs Modernization (NBR)
- Component 3: Trade Facilitation Agreement (TFA) Implementation (MoC)
- Component 4: Regional Connectivity Infrastructure (RHD)

Description of the project components and their typology are furnished in the Chapter 2.

Implementing Agencies

The Project will be implemented by the Bangladesh Land Port Authority (BLPA), National Board of Revenue (NBR), Ministry of Commerce (MoC) – WTO cell, and Roads and Highways Department (RHD).

Component 1 will be implemented by the BLPA, an autonomous body under the Ministry of Shipping that manages all land ports of Bangladesh.

Component 2 will be implemented by NBR (Customs Wing) which is under the Internal Resource Division of the Ministry of Finance. Its main functions are collecting duties and taxes, protecting domestic industry, trade liberalization, and trade facilitation.

Component 3 will be implemented by MoC – WTO cell which is mandated to implement WTO rules and regulations, build trade capacity and formulate and implement trade policies.

Component 4 will be implemented by RHD, an agency of the Road Transport and Highways Division of the Ministry of Roads, Highways and Bridges. This department is responsible for constructing and maintaining major roads network, including national highways, regional highways, and district roads.

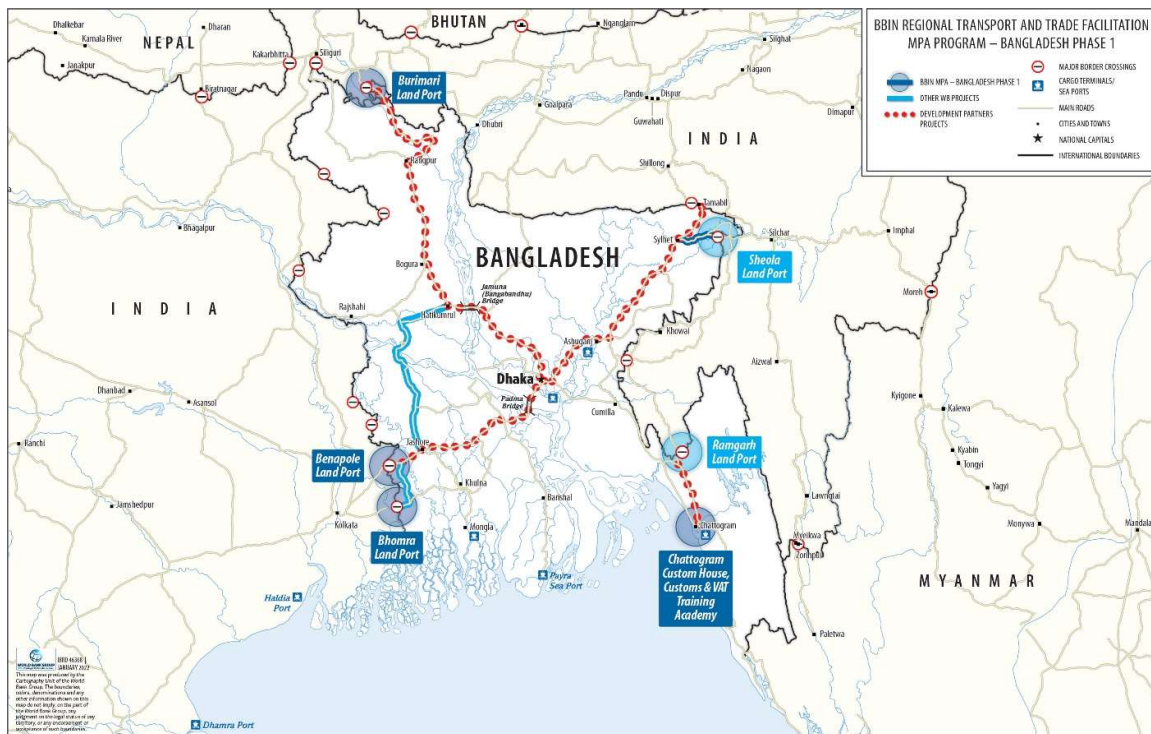


Figure 1.1: Location Map of BBIN Regional Transport and Facilitation MPA Program

1.1 Purpose of the ESMF

This ESMF has been prepared to ensure environmental and social integration in the planning, performance, and monitoring of project-supported activities during the preparation and execution of the BBIN-MPA Phase 1 activities in Bangladesh. The ESMF will guide pre-investment works/studies (such as environmental and social screening, environmental and social assessment, environmental and social management plans, etc.) as well as a set of steps, processes, procedures, and mechanisms for ensuring an adequate level of environmental and social consideration and integration in each investment in the project-cycle. While the purpose of this ESMF document is to identify the potential adverse effects of the BBIN MPA Program, the particular objectives are to -

- Ensure that all project interventions are environmentally sustainable and socially feasible, incorporate environmental and social issues into their identification, design, and execution;
- Ensure that all relevant environmental and social issues are incorporated into the design and implementation of the projects/sub-projects and the BBIN MPA Program's succeeding phases.;
- Consider the program's possible environmental and social risks, benefits, and consequences in a holistic approach, and devise strategies to prevent, mitigate, and manage risks and impacts while maximizing benefits.;
- Ensure that national rules and regulations, as well as World Bank obligations, are followed. The ESMF details the BBIN MPA Program's possible impacts, mitigation, enhancement, contingency, compensation measures, environmental and social management and monitoring plan, and an institutional framework for implementing the ESMP, including inter-agency cooperation. The ESMF will make it easier for Bangladeshis to comply with the government's policies, actions, and rules, as well as the World Bank's environmental and social standards (ESSs) under the recently established Environmental and Social Framework (ESF), and
- As suitable to the project phases, guide the preparation and conduct of the thorough IEE/ESIAs/ESMPs of the subsequent stages of the BBIN MPA Program.

1.2 Rationale of the ESMF

BBIN-MPA Program and its sub-projects' location and design for Phase 1 in Bangladesh are not known as yet (though broader area of interventions have been selected) therefore, depth and breadth of risks and impacts are not known. The component interventions' number, kind, and locations of the sub-projects will be determined during the project execution stage. Beneficiary groups and places for infrastructures will be known during implementation. Hence site-specific environmental social issues and impacts for all the potential sites could not be identified and specified for mitigation during the planning stage. Each IAs will screen for project interventions at the implementation level and identify the target group beneficiaries to prepare and implement social action plans. As a result, systematic guidance for social preparation and management is required. Hence it is essential to develop and follow a framework approach of the project's ES assessment and management procedure. The borrowers have prepared the ESMF based on the overall assessment of the project components and the areas that might be covered. BLPA with the help of consultant coordinated to prepare the ESMF on behalf of other implementing agencies NBR/MoC-WTO Cell/RHD as well so that Implementing Agencies (IAs) could ensure best ES issue management following the WB Environmental and Social Framework (ESF) during its implementation. However, following screening, site-specific assessment and management plan will be prepared during implementation in accordance with ESMF as soon as the exact location, layout, detail activities of subprojects, and design are known.

1.3 Scope of the ESMF

A site specific ESIA is already prepared for the Sylhet-Charkhai-Sheola road under Component 4, to be implemented by RHD. This ESMF, thus, only covers BLPA, NBR and MoC-WTO cell (Components 1, 2 and 3) for the Phase 1 components in Bangladesh as a constituent part for guidance in the implementation stage along with other required E&S documents for disclosure prior to board approval, consistent with the ESF and the GoB environmental regulatory framework. Although, the BBIN is an MPA, this ESMF of the BBIN Program-Bangladesh Phase 1 has been prepared and disclosed covering only the Phase 1, and the E&S documentations of the subsequent phases will be prepared separately. However, as the design and locations of the Burimari Land Ports under Component 1 (BLPA) and Sylhet-Charkhai-Sheola-Sutarkandi Highway Improvement under the Component 4 (RHD) are more in advance level, two separate ESIA have been prepared for these sub-projects by the clients and will be disclosed by the appraisal stage.

The preparation of the ESMF considered the following:

- Screening of all sub-projects, components, and activities to be implemented under the BBIN-MPA Program based on feasibility study initial reports to make a preliminary assessment of the potential ES issues;
- Consideration of all applicable ESSs including guidelines and standards prescribed in the WBG's Environmental, Health and Safety Guidelines (EHSG) and existing GoB's environmental standards;
- Assessment of policy implications for the proposed project activities considering WB, GoB and International laws/conventions/practices, and identify policy gaps between WB and the GoB, and suggest options for gap minimization;
- Development of a framework and guidelines for preparation of subproject specific screening, Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plans (ESMPs) (measures to reduce, mitigate and/or offset adverse risks and impacts), Resettlement Action Plans (RAPs) that comply with local ES laws and the WB ESF and Environmental and Social Standards (ESSs);
- Recommendations on institutional implementation and monitoring arrangement including project-specific GRMs;
- Conduct of stakeholder mapping and subsequent consultations to cover groups/ communities/ stakeholders to elicit their views and suggestions on actions and measures for inclusion in the SEP

to ensure inclusion of the potential project affected persons, vulnerable and marginalized groups and ethnic communities including women in the project preparation process;

- Development of ES capacity building plan that will include a broader ES capacity assessment of BLPA, NBR, MoC-WTO cell and RHD which will be incorporated as action points in the Borrower's Institutional ES capacity development plan which has been reflected in the ESCP.
- A cost table and budget to be adopted in the project budgetary provision to ensure implementation of the ESMF and develop ES management capacity of the partners.

Once details of the project sites are available at later stages of the project, the need for and type of E&S assessments and management plans will be reviewed, according to WB policies and GoB legislation and will update accordingly.

1.4 Approach and Methodology

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

1. Review of the program details and meeting/discussions with the respective teams of BLPA, NBR, MoC-WTO cell, RHD and WB;
2. Review of the policy and regulatory requirements;
3. Field visit by E&S experts with the respective team and initial scoping and identifying to determine the critical environmental and social parameters and aspects that are likely to be impacted by the program activities;
4. Collect and analyze the baseline environmental and social data with the help of primary and secondary field data collection and literature review;
5. Consult with the stakeholders, including beneficiary/neighborhood and affected communities, and develop the consultation process;
6. Assess the potential and likely impacts of the program activities at different construction phases;
7. Prepare an outline of environmental and social management issues according to the requirements of the applicable ESSs of the ESF;
8. Prepare an outline of ESMP; and
9. Compile the individual thematic reports into ESMF.

The methodology for the preparation of the ESMF is presented in Figure 1.2.

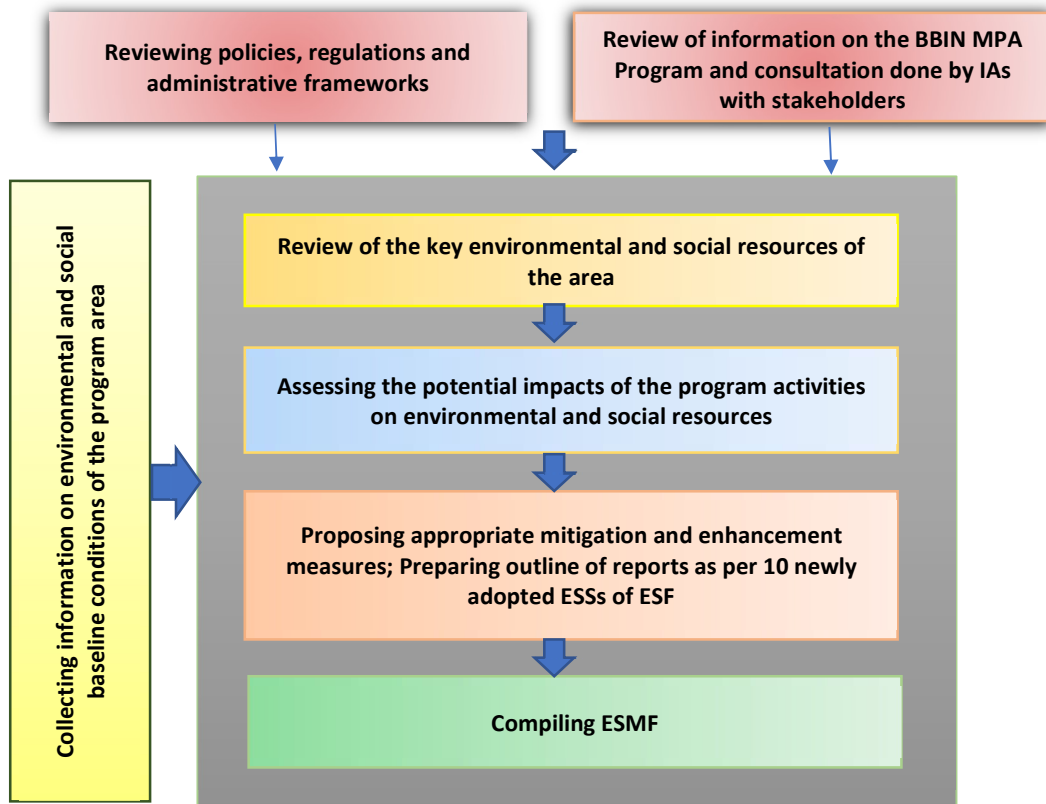


Figure 1.2: Approach of ESMF Preparation

2. PROJECT DESCRIPTION

As seen by an increasing number of sub-regional and bilateral connectivity agreements, the relationship between Bangladesh, Bhutan, India, and Nepal (BBIN nations) is developing, indicating momentum to advance the regional transport and trade facilitation agenda. The project will increase the efficiency, climate resilience, and safety of products and people moving along regional corridors.

Phase 1 (FY22) will provide an estimated US\$ 750million in IDA funding for Bangladesh. **BLPA, RHD, NBR and MoC are the four (04) implementing agencies responsible to carry out the phase-1 activities.** BLPA will be responsible for the expansion work of 03 land ports (Burimari, Bhomra and Benapole) including construction of administrative buildings along with boundary walls, warehouses, parking facilities, water supply facilities and other resource accommodation. Under RHD's supervision, the Sylhet – Charkhai-Sheola-Sutarkandi road will be widened into 4 lane road. MoC will be implementing the capacity building facilities to boost the import-export sector. NBR will be expanding the custom house and training academy at Chattogram. Custom houses at Benapole and Dhaka Airport may also be considered for inclusion in the Project.

2.1 Project Development Objectives (PDO)

The proposed Project Development Objective is to augment trade-enabling infrastructure, technology, and processes to improve the conditions for regional transport and trade in Bangladesh.

Outcome indicators would measure progress towards the achievement of the PDO, including among others:

- (i) Reduced transit times at priority border points [Percentage change]
- (ii) Increased efficiency of transport mobility for passengers and goods on sections of the BBIN regional road network [Percentage change]
- (iii) Reduced variability in transport costs due to extreme climate events [Percentage change]

2.2 Description of BBIN MPA Program Phase 1 in Bangladesh

As described in the Chapter 1, BBIN-MPA Phase 1 in Bangladesh has four Components to be implemented by four different agencies i.e., BLPA, NBR, MoC-WTO Cell and RHD. Each of these components have following sub-components.

Component 1: Land Port Development and Border Management Improvement (BLPA)

Sub-component 1.1: Upgrading of Benapole, Burimari, and Bhomra land ports

Sub-component 1.2: Development of Automated Border Management System

Sub-component 1.3: Technical Assistance to enable contemporary trade facilitation practices

Component 2: Customs Modernization (NBR)

Sub-component 2.1: Upgrading of Custom Infrastructure

Sub-component 2.2: Development of Customs and Value Added Tax (VAT) Training Academy

Sub-component 2.3: Technical assistance for tariff modernization

Sub-component 2.4: Technical assistance for Risk Management Commissionerate, Feasibility and detailed design for proposed National Risk Targeting Center and TA for proposed Bangladesh Single Window Commissionerate

Sub-component 2.5: Technical assistance for Bonded Warehouse modernization

Component 3: Trade Facilitation Agreement (TFA) Implementation (MoC)

Sub-component 3.1: Strengthening of the National Trade Facilitation Committee (NTFC) and development/ implementation of National Trade and Transport Facilitation Action Plan

Sub-component 3.2: Development of Decision Support System for policy analysis, trade statistics and trade negotiations

Sub-component 3.3: Formulation and implementation of National Tariff Policy

Sub-component 3.4: Upgrading of the Bangladesh Trade Portal (BTP)

Sub-component 3.5: Training programs on trade facilitation for women traders and entrepreneurs

Component 4: Regional Connectivity Infrastructure (RHD)

4.1: Sylhet-Charkhai-Sheola-Sutarkandi Highway Improvement

4.2: Technical Assistance for regional connectivity and policy development

Location map of the major interventions are presented in the Figure 2.1.

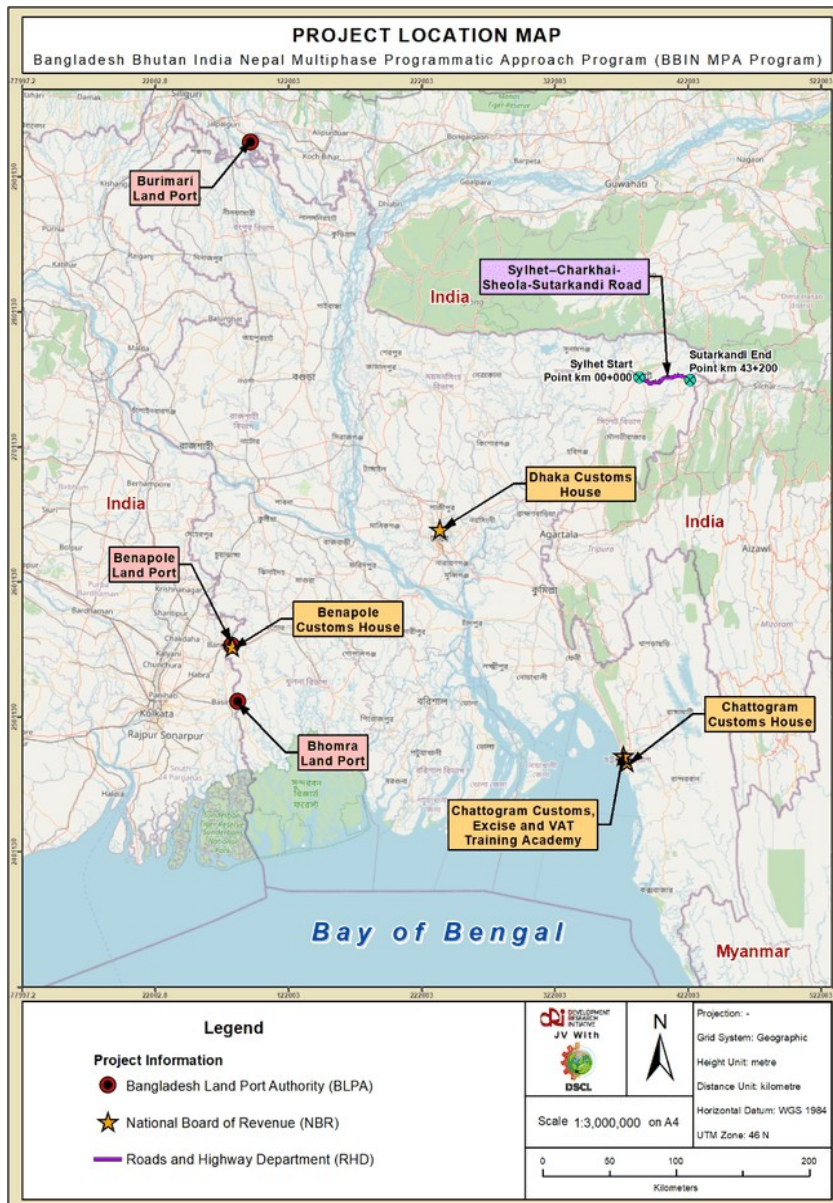


Figure 2.1: Project Location Map

Description of the components/sub-components and typology of the sub-projects are described below:

Component 1: Land Port Development and Border Management Improvement (BLPA)

Sub-component 1.1: Upgrading of Benapole, Burimari, and Bhomra land ports

This sub-component will support the upgrading of infrastructure facilities of Benapole, Bhomra, and Burimari land ports, which are critical for trade with India and with Bhutan and Nepal. Infrastructure modernization will be premised on digitalization, contact-free and paper-free processing. The project will seek to ensure a holistic development of the land ports, underpinned by enhanced border agency collaboration and coordination (including with India) and improved border management.

- *Benapole-Petrapole* is the largest land border crossing in South Asia in terms of freight traffic and value of goods. It handles about 80 percent of the total trade with India through land routes. The modernization of the land port would reduce congestion and enhance capacity of truck flows from

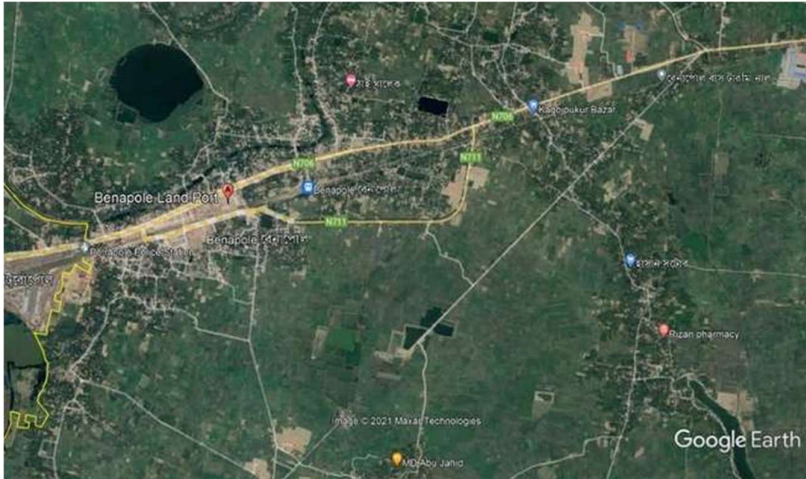


Figure 2.2: Benapole Land Port, Jashore

India at Petrapole Integrated Check Post (ICP). Currently, the Petrapole ICP has the capacity to handle 700-750 export trucks but clears only 370 trucks as the present infrastructure, systems, and processes at Benapole does not match the facilities of its Indian counterpart. Area to be developed amount to 50 acres. The Benapole Land Port area is at Benapole, Sharsha, Jashore District. It is in the southwest region of Bangladesh within Bara Achra, Benapole, Choto Achra and Bhabarber mouzas of Benapole Union under the Sharsha Upazilla of Jashore District. Under the subproject, boundary wall will be constructed.

- *Bhomra-Ghojadanga* is the second largest land port between in Bangladesh and India. The Land Port has seen increasing demand due to congestion at Benapole-Petrapole.

Demand is expected to increase with completion of the Padma Multipurpose Bridge as Bhomra is on shortest route from Kolkata to Dhaka.



Figure 2.3: Bhomra Land Port, Satkhira

Traffic forecast indicates future annual growth of 8 percent. Traffic demand for trucks is forecasted at 1,650 per day by 2030, more than double to current from current traffic. Bhomra land port is

located at Sadar Upazila, Satkhira. The land port officially started its operation from 19 May 2013. Current storage capacity is 1600 MT. The subproject involves development of 25.87 acres' area (i.e., existing port area of 15.67 acres and additional areas of 9.21 and 0.99 acres).

- *Burimari Land Port* is unable to meet increasing freight flows, leading to congestion and delays in border crossing time. Burimari-Changrabandha is the designated land port for trade to and from Bhutan. Burimari land port is situated at Sreerampur Union in



Figure 2.4: Burimari Land Port, Lalmonirhat

Patgram sub-district. It is the 3rd largest land port of Bangladesh. In 1988 Burimari land port has been established at Burimari zero point for import and export goods with India, Bhutan and Nepal by road way. Furthermore, more design details are known from Burimari land port (when compared to other ports) and then mention that therefore a specific ESIA has already been prepared during appraisal stage. The other sub-project specific ESIA's will be prepared during implementation when design works progressed.

The following activities will be carried out for this land port-

Specification for Building			
Item	No.	Type	Area
Office	1	Floor: 4-storied	Sqm: 2000 per floor
Residential	2	Floor: 4-storied	Sqm: 300 per floor
Land Filling			
Item	Amount/Remarks		
Earthwork's volume	3 lac cum if filling ht is 3meter		
Boundary wall: -			
Item	Amount/Remarks		
Length of the boundary wall	1200 meter		
Height of the boundary wall	Minimum 15 ft from FGL		
Width if the boundary wall	Thickness 15 and 10 inch		
Water Supply System: -			
Item	No./ Amount/Remarks		
Number of Pump House	1 no		
Yield of the Wells	300 meter		
Estimated daily production	1000 liters daily		
Capacity of the water reservoir	100000 liters		
Length of the pipeline route	2000 meter		
Item	No./ Amount/ Remarks		
Number of watch tower	6 nos		
Height of the watch tower	12 meters		
Electrical design	Street light, tower, electric tower, over the boundary wall in operational area, underground cable laying		
Requirement of electricity	100 KVA		
Capacity of warehouses	15000 sqm		
Open Stock yard capacity	81000 sqm		
Area of Transshipment Sheds	5000 sqm		
RCC Works	3,15,000 cum		

Thickness of the pavement	300 mm
Amounts of steel required	36000 mton
Length of internal road network	1500 meter
Width of Internal Road Network	21 meter
Length of the drainage network	2500 meter
Type of internal drains	RCC

1.2: Development of Automated Border Management System

This sub-component will support the development of a new multi-agency Automated Border Management System platform to increase visibility of the trade chain and reduce costs and unnecessary interactions with cargo shipments. This automated system is especially relevant in the context of COVID-19 where it has become imperative to reduce face to face interactions and reduce manual processes. It will seek to improve processes by BLPA and other border management partners that fall within and, outside of the regulatory requirements. For example, effective administrative and operational processes by BLPA, such as cargo handling, storage, tariff calculation, and levy payment procedures, while not related to regulatory obligations, also contribute to the overall efficiency of cross border trade flows. Thus, modernizing regulatory and non-regulatory processes, automating them, and subsequently looking for opportunities to share valuable data amongst border management partners (including India) will contribute to trade flow efficiencies and trade chain health and security.

1.3: Technical Assistance to enable contemporary trade facilitation practices

This sub-component will finance long-term master plans, feasibility design studies and environmental and social

safeguard studies for priority land ports that will be considered for financing in subsequent MPA phases (e.g. Banglabandha, Hili, Sonahat, Bilonia, Tamabil, Bholaganj, Darshana and other land ports). Support will also be provided to build capacity of BLPA staff in modern border management practices.

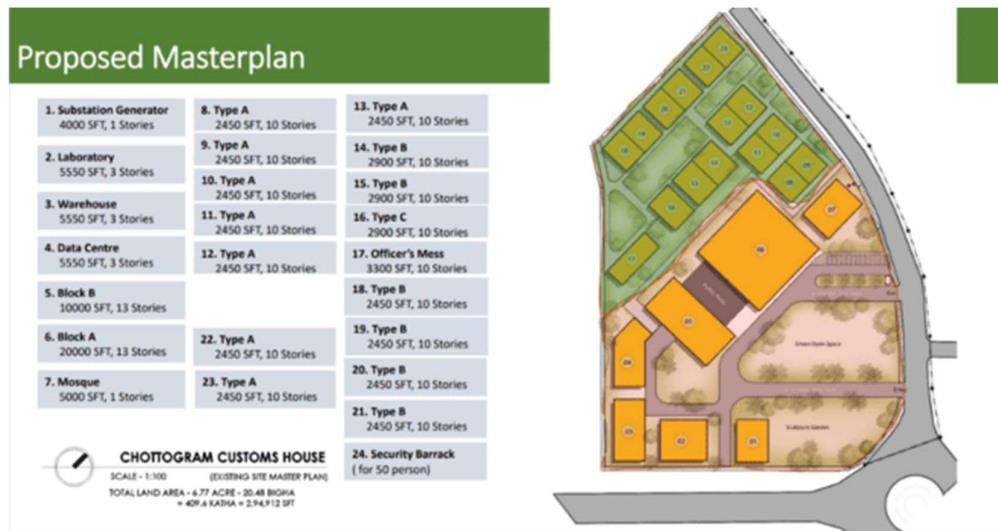


Figure 2.5: Proposed Master Plan, Chattogram Customs House

COMPONENT 2: Customs Modernization (NBR)

2.1: Upgrading of Custom Infrastructure

This sub-component will support the upgrading of physical facilities at the Chattogram Customs House, which manages 90 percent of Bangladesh's import and export declarations (13,000 per day), servicing more than 7,000 traders per day. Rapidly growing trade volumes have over-burdened the existing facilities that were initially constructed in 1920. The Custom House would be modernized in line with international good practice with strictly controlled designated areas for trader/customs official interactions. The designs would reflect COVID-19 protocols aimed at reducing face to face interactions. In addition, Dhaka and Benapole customs houses may be considered for inclusion under this sub-component. The proposed site of **Chattogram Customs House** is located at 22°18'42.97"N (Latitude) and 91°47'55.50"E (Longitude) under Chattogram City Corporation, Thana: Bandar, ward: 36 an area of 8 acres of land. **Dhaka Customs House** is located at 23°51'7.88"N (Latitude) and 90°24'17.01"E (Longitude) and **Benapole Customs House** are located at 23°02'7.12"N (Latitude) and 88°53'56.83"E (Longitude). Locations of these customs houses under BBIN-RTTF Phase 01 in the map in Figure 2.6 followed by the site specific satellite images. Although the design and implementation plan of NBR for the improvement of Chattogram Customs House has not been finalized yet, but the NBR presented the proposed master plan of Chattogram Customs House is furnished in Figure 2.5.



Figure 2.6: Location of Different Customs House under BBIN RTTF Phase 01

2.2: Development of Customs and Value Added Tax (VAT) Training Academy

This sub-component will support the development of a state-of-the-art Training Academy to help institutionalize NBR's capacity building programs and allow development of e-Training modules and planned courses for continuous Human Resource Development. Although the design and implementation plan of the NBR for the development of the Customs and Value

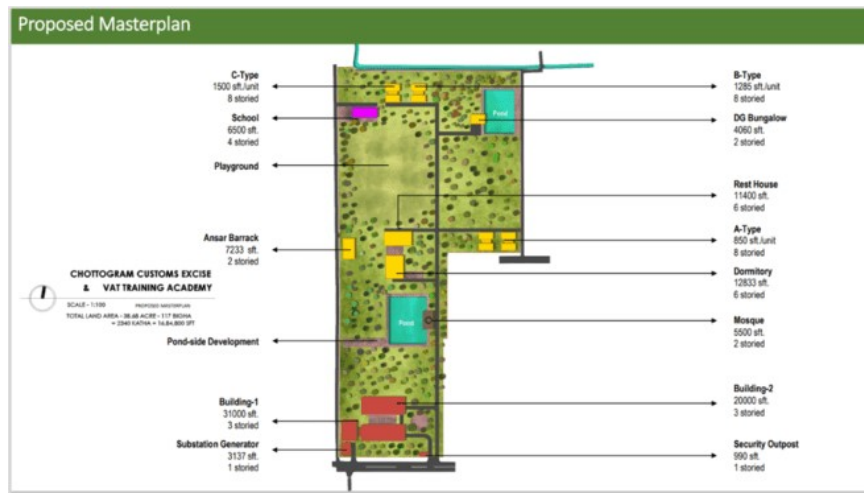


Figure 2.7: Proposed Master Plan, Customs and Value Added Tax (VAT) Training

Added Tax (VAT) Training Academy has not yet been finalized, the following work will be done per their discussion and presentation. The proposed master plan is depicted in Fig 2.7 and 2.8.

PROPOSED MASTERPLAN				
Type	Proposed Building Function	Area per Floor (sqft)	No. of story	Total area (sqft)
ADMINISTRATION BUILDING	Admin Office	31000	6	186000
	Conference Room			
	Computer Lab			
	Video Gallery			
	Language Lab	22016	6	132096
	E-Library			
	Customs Archive			
	Multipurpose Hall			
	Prayer Space			
	Cafeteria			
RESIDENTIAL FACILITY	Rest House	11400	6	68400
	Dormitory	12833	6	76998
	D Type- Director General's Residence	4060	2	8120
	C Type- 1st Class Officer's Residence	7155	8	57240
	B Type -Officer's Residence	6140	8	49120
	A Type- Staff Residence	12200	8	97600
	Ansar Barrack	7233	2	14466
	Existing School Relocation	6500	4	26000
	Electrical Substation	3137	1	3137
	Pump House			
AMENITIES	Water Tank	5500	2	11000
	Central Mosque			
	New Pond			
	Amphitheatre			
	Gymnasium			
INFRASTRUCTURE	Swimming Pool			
	Playground			
	Desalination and Grey water Treatment Plant			
	Rainwater Harvesting System			
	Sewerage Treatment Plant			
	Solar Power & Exterior Lights			
	Underground Cable Ducting			

TOTAL BUILT AREA =7,30,177 SFT	
D type- Director General Residence / Bungalow (4060 sqft per floor, 2 stories),	
C type - officer's residence -1500 sqft per unit, 4 unit per floor, 7155 per floor (57240 sqft),	
B type- Officer's residence – - 1285 sqft per unit, 4 unit per floor, 6140 sft per floor (49120 sqft),	
A type - staff residence - 850 sqft per unit, 3 unit per floor, 2 buildings, - 12200 sft per floor (97600 sqft),	
Residential Facilities for 161 no of Families	

Figure 2.8: Proposed Master Plan, Customs and Value Added Tax (VAT) Training

2.3. Technical assistance for tariff modernization

This sub-component will support NBR in developing and implementing a phased implementation plan for tariff rationalization, seeking to reduce the overall level of tariffs and dispersion as per the vision set out by the GoB in its 8th FYP and proposed Bangladesh National Tariff Policy (to be prepared by Ministry of Commerce). This will lead to preparation and implementation of a prioritization plan for tariff rationalization and implementation by NBR. The phased implementation plan will take into consideration export diversification, sector competitiveness, job creation, investment, Least Development Country (LDC) graduation and economic recovery from COVID 19. Crafting such a tariff rationalization plan requires significant capacity improvement in simulation, revenue modeling, and other statistical analysis supported through this sub-component.

2.4 Technical assistance for Risk Management Commissionerate, Feasibility and detailed design for proposed National Risk Targeting Center and TA for proposed Bangladesh Single Window Commissionerate

This sub-component will build on the reform momentum in Risk Management, Jobs DPC Series of the Bank and IFC advisory project TraCED (602137). The activities will cover the following: (a) Capacity Building: A competency based human resource strategy and succession plan will be required to ensure that the CRMC is appropriately staffed to carry out a full range of duties. This will include development of e-learning modules as well as Training of Trainers (ToT) for continuous capacity development program. There will be provisions for learning from benchmark countries as well; (b) detailed Standard Operating Procedures (SOP) for the CRMC including the work functions and coordination with local risk management units to support operationalization; (c) feasibility and detailed design of proposed National Risk Targeting Center with SOP for coordinated border management; and (d) for NSW Commissionerate, TA will be provided for stakeholder consultation, visioning, development of organogram, job description, roles and functions of officials as well as SOP for such collaborative border management platform to sustain Bangladesh Single Window.

2.5 Technical assistance for Bonded Warehouse modernization

The key focus of this sub-component will be to support NBR in streamlining Bonded Warehouse Policy and regulations for bond license, renewal, management, audit and reconciliation removing the disparities between Ready Made Garments and non-RMG sectors. It may also support change management for Customs Bond Management System (CBMS), proposed automation of Duty Drawback and Exemption Office and addressing reconciliation challenges.

Component 3: Trade Facilitation Agreement (TFA) Implementation (MoC)

3.1: Strengthening of the National Trade Facilitation Committee (NTFC) and development/implementation of National Trade and Transport Facilitation Action Plan

This sub-component will support establishing the NTFC Secretariat and developing and implementing the National Trade and Transport Facilitation Action Plan. The NTFC will serve as the primary trade and transport coordination mechanism in Bangladesh and serve the functions envisioned in the World Trade Organization (WTO) Trade Facilitation Agreement (TFA). The formation of the NTFC Secretariat will be critical for supervising and monitoring the TFA implementation of the trade related agencies.

To deliver its mandate as the focal agency for TFA implementation, the MoC will develop and periodically update the Road Map of TFA implementation of trade related bodies and develop an Action Plan Matrix. This activity will require the close involvement of NBR as Bangladesh Customs is directly involved in implementing 36 out of 37 measures under the TFA. The sub-component will also support studies and review of trade policy, acts, rules, bilateral agreements, and capacity development programs of related border clearance agencies on TFA measures, e.g. Risk Management, Appeal Procedure, Sanitary and Phytosanitary (SPS) measures and Technical Barriers to Trade (TBT), Intellectual Property Rights (IPR), etc. The capacity development program will be informed by a skills assessment to be carried out under BBIN program.

3.2 Development of Decision Support System for policy analysis, trade statistics and trade negotiations

This sub-component will support a Decision Support System that will provide policy analysis, market research and trade statistics to support the MoC's mandate in implementing trade policy including negotiating various trade agreements. This incorporates the establishment of an institutional architecture, ICT connectivity and associated skills and capacity building needs.

3.3: Formulation and implementation of National Tariff Policy

This sub-component will support the formulation of a National Tariff Policy. A concept note is being prepared with support from IFC Advisory in this regard. Necessary capacity building of officials will also be carried out for subsequent policy updating and amendments to the policy.

3.4. Upgrading of the Bangladesh Trade Portal (BTP)

This sub-component will support the enhancement of the Bangladesh Trade Portal, which is a key element for the successful functioning of National Trade Single Window.

3.5. Training programs on trade facilitation for women traders and entrepreneurs

This sub-component will seek to empower women traders and entrepreneurs and support their integration into national, regional and global markets through capacity building in capacity building in trade related regulatory issues. This activity will reflect emerging from pilot programs undertaken under BBIN.

Component 4: Regional Connectivity Infrastructure (RHD)

4.1: Sylhet-Charkhai-Sheola-Sutarkandi Highway Improvement

This sub-component will upgrade the existing Sylhet - Charkhai - Sheola – Sutarkandi road. This road section connects Sheola Land Port (financed by BBIN) at Sutarkandi with the Sylhet-Dhaka Highway (N2)

which is part of Asian Highway 1 and 2. The project road section is part a strategic regional corridor, the Bangladesh-China-India-Myanmar (BCIM) corridor which extends from (Kolkata, India to Kunming, China). Financing this road section would complement the WB's investments of Benapole, Bhomra and Sheola land ports (transit gateways of the BCIM), ADB's investments in the Dhaka-Sylhet road, and AIB's investment in the Sylhet-Tamabil road.

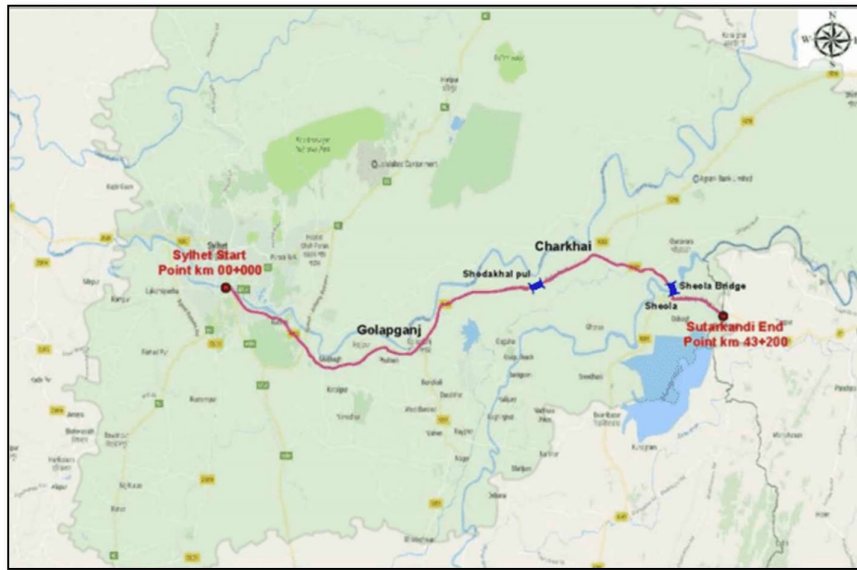


Figure 2.9: Proposed Sylhet-Charkhai-Sheola-Sutarkandi Road

Presently, Gopalganj-Charkhai-Sheola-Sutarkandi is a two-lane carriageway of a regional category road with a width of 5.5m. The road starts from the Keen bridge point, passes through Gopalganj, Charkhai, and Sheola and ends at Sutarkandi a border Land Port with India. Overall condition of the road is poor. From Charkhai the condition is worsen towards border point. In the project, it has been proposed to a 4-Lane Highway and 5.5 m services lane on both sides. 43.10 kilometer flexible & rigid pavement of four lane highway with international specifications and standard. The work also includes construction of embankment, land acquisition and resettlement, construction of flyover, underpass, and culverts.

4.2: Technical Assistance (TA) for regional connectivity and policy development

This sub-component will provide technical assistance to help Bangladesh's preparedness and subsequently implementation of the Bangladesh-India-Nepal Motor Vehicle Agreement (MVA). This will entail, inter alia, developing standard operating procedures, ensuring regulatory alignment, provision of training and awareness programs (government and private sector), and assessment of infrastructure requirements along the MVA corridors. The component will also assess IT System requirements for the electronic issue of permits to authorized operators, tracking system, temporary admission compliance monitoring system, and associated middleware/API integration to connect and share data with other MVA signatories, etc. The project may also provide support to establish of regional connectivity secretariat and continuously provide support for organizing meetings, maps and information sharing within member countries.

Financing will also be extended to develop a pipeline of regional connectivity transport projects through the provision of feasibility studies, detailed design and environment and social studies. The focus will be on priority transport corridors not captured under the SASEC umbrella. A comprehensive trade gateway connectivity assessment will be conducted to improve congested and less developed road sections towards ports, rail, inland water terminals, international borders, etc. It will be explored if potential corridors can be developed as greenfield expressways to facilitate trade. Besides, all TA TORs and deliverables will be in line with WB ESF.

3. POLICY, LEGAL AND REGULATORY FRAMEWORK

3.1 General

This chapter presents a review of the national policy, legal, and regulatory framework relevant to the environmental and social aspects of the BBIN MPA Program. In addition to the national environmental and social laws, regulations, and policy.

3.1 Review of Relevant National Environmental Law, Policy and Regulatory Framework

3.1.1 Relevant National Policies

Governance and management of the environmental and social sectors are molded largely by key specific policies. The below discussed significant policies directly bear the state of Bangladesh's environment and social aspects. The discussion also mentioned the applicability of the policies to the proposed program.

Table 3.1: Summary of Relevant Environmental and Social Policies of the GoB

Policy	Key Features	Applicability
Bangladesh Climate Change Strategy and Action Plan (BCCSAP) 2009	<p>The GoB prepared the Bangladesh Climate Change Strategy and Action Plan (BCCSAP) in 2008 and revised it in 2009. This is a comprehensive strategy to address climate change challenges in Bangladesh. Bangladesh Climate Change Strategy and Action Plan built on and expanded the NAPA. It is built around the following six themes-</p> <ul style="list-style-type: none"> ▪ Food security, social protection, and health to ensure that the poorest and most vulnerable in society, including women and children, are protected from climate change and that all programs focus on the needs of this group for food security, safe housing, employment, and access to essential services, including health. ▪ Comprehensive disaster management further strengthens the country's already proven disaster management systems to deal with increasingly frequent and severe natural calamities. ▪ Infrastructure ensures that existing assets (e.g., coastal and river embankments) are well maintained and fit for purpose. That urgently needed infrastructure (cyclone shelters and urban drainage) is put in place to deal with the likely impacts of climate change. ▪ Research and Knowledge management predict that climate changes likely to scale and timing 	Relevant as the country is vulnerable to climate change effect.

Policy	Key Features	Applicability
	<p>impacts different sectors of the economy and socioeconomic groups; to underpin future investment strategies and ensure that Bangladesh is networked into the latest global thinking on climate change.</p> <ul style="list-style-type: none"> ▪ Mitigation and low carbon development to evolve low carbon development options and implement these as the country's economy grows over the coming decades. ▪ Capacity building and Institutional strengthening enhance government ministries, civil society, and the private sector to meet the challenge of climate change. 	
<p>National Environment Policy 2018</p>	<p>Bangladesh adopted the National Environmental Policy (NEP) in 1992 to chart a path towards the country's development. The NEP 2018 is a revision of the NEP 1992 in the new reality of climate change. The NEP 2018 also outlines a more up-to-date understanding of the extent and magnitude of environmental degradation that has become a fact of life in the world in general and in Bangladesh in particular. The NEP 2018 outlines the problems of population growth, poverty, illiteracy, lack of awareness and healthcare services, limitation of arable land, unplanned development and urbanization, and industrialization as the major impediments to conserving the environment. The NEP sets out the basic framework for environmental action and broad sectoral guidelines for action. Major elements of the policy are-</p> <ul style="list-style-type: none"> (i) maintaining the ecological balance for ensuring sustainable development; (ii) protection against natural disasters; (iii) identifying and controlling activities that are polluting and destroying the environment; (iv) ensuring environment-friendly development in all sectors; (v) promoting sustainable and sound management of natural resources; and (vi) active collaboration with international initiatives related to the environment. 	<p>During the different phases of sub-project development, sector specific action plan will be adopted based on the policy for air pollution control, water resource management, public health, ecosystem management, etc. The policy mentions that Environmental Impact Assessments (EIA) should be conducted before projects are undertaken.</p>

Policy	Key Features	Applicability
	<p>The NEP, amongst other aims, seeks to ensure that transport systems, including roads and inland water transport, do not pollute the environment or degrade resources. The policy states that environmental impact assessment should be conducted before undertaking projects. The NEP 2018 includes additional elements addressing climate change mitigation and adaptation as key environmental issues facing the country and integrating a comprehensive 3R approach to the massive and growing industrial and household waste problem that has swelled along with the country's urbanization.</p>	
National Water Policy, 1999	<p>The policy aims to guide the major water sector players to ensure optimal development and management of water. The policy emphasizes efficient and equitable management of water resources, proper harnessing and development of surface and groundwater, availability of water to all concerned, and institutional capacity building for water resource management. It also addresses issues like river basin management, water rights and allocation, public and private investment, water supply and sanitation, and water need for agriculture, industry, fisheries, wildlife, navigation, recreation, environment, preservation of wetlands, etc. The policy has several clauses related to the project for ensuring environmental protection.</p>	<p>Applicable for the preservation of water quality.</p>
National Forest Policy, 1994	<p>The National Forest Policy of 1994 is the amended and revised version of the National Forest Policy of 1977. The policy is designed to conserve the existing forest areas, bring about 20 % of the country's land area under the Forestation Programme, and increase reserve forests by 10 percent per year to 2015 through coordinated GoB-NGOs and active participation of the people.</p>	<p>Applicable when considering global warming and the protection of forests.</p>
National Land Use Policy, 2001	<p>The Bangladesh government adopted the National Land Use Policy in 2001, setting out guidelines for improved land-use and zoning regulations. The main objectives of this policy are to ensure criteria-based uses of land and provide guidelines for usage of land for agriculture, housing, afforestation, commercial and industrial establishments, rail and highway, and tea and rubber gardens. Overall, this</p>	<p>Applicable as land-use changes from agricultural to road/highway or its relevant facility</p>

Policy	Key Features	Applicability
	<p>policy promotes a sustainable and planned utilization of land.</p> <p>The main contents of this policy are:</p> <ul style="list-style-type: none"> ▪ Stopping the high conversion rate of agricultural land to nonagricultural purposes; ▪ Utilizing agro-ecological zones to determine maximum land-use efficiency; ▪ Adopting measures to discourage the conversion of agricultural land for urban or development purposes; <p>Improving the environmental sustainability of land-use practices.</p>	
<p>National Land Transport Policy, 2004</p>	<p>The Land Transport Policy has been formulated in light of the Government’s pledge to establish a transport system that is safe, cheap, modern, technologically dependable, and environmentally friendly. The objectives of this policy are:</p> <ul style="list-style-type: none"> ▪ To introduce long-term network planning. ▪ To maintain the road network at a level, this protects the value of the investment. ▪ To secure a sustainable means of funding road maintenance. ▪ To improve the management of traffic. ▪ Management of roadside activities. ▪ To develop an integrated planning approach in road construction. ▪ To involve the private sector more in infrastructure, services, and maintenance. ▪ To sufficiently protect the environment from the road construction program ▪ All new roads and significant improvements will be subjected to an EIA ▪ Funding will be provided for mitigation measures <p>The Government will publish environmental standards for new roads and new design standards addressing environmental issues</p>	<p>According to the policy, all new roads and major improvements, tolled or otherwise, are subject to an Environmental Impact Assessment (EIA).</p>
<p>8th Five-Year Plan of GoB (July 2020 - June 2025)</p>	<p>This 8th Five Year Plan represents the first phase of the country’s Perspective Plan 2041 (PP2041), which aims to bring Bangladesh closer to the goals of attaining Upper Middle-Income Country (UMIC) status, attaining major Sustainable Development Goal (SDG)</p>	<p>The broad scale objective and purpose of the proposed BBIN-RTTF phase 01 project under MPA program of the World Bank is in line with the 8th five-year plan of GoB among BBIN countries - requiring concerted efforts to</p>

Policy	Key Features	Applicability
	<p>targets, and eliminating extreme poverty by FY2031. In the backdrop of these factors, the 8th Plan centers on six core themes: 1. Rapid recovery for COVID-19 to restore human health, confidence, employment, income and economic activities; 2. GDP growth acceleration, employment generation, productivity acceleration and rapid poverty reduction; 3. A broad-based strategy of inclusiveness with a view to empowering every citizen to participate fully and benefit from the development process and helping the poor and vulnerable with social protection- based income transfers; 4. A sustainable development pathway that is resilient to disaster and climate change; entails sustainable use of natural resources; and successfully manages the inevitable urbanization transition; 5. Development and improvement of critical institutions necessary to lead the economy to UMIC status; 6. Attaining SDG targets and coping up the impact of Least Developed Country (LDC) graduation.</p>	<p>develop a contemporary trade facilitation system, underpinned by a conducive policy environment for international and regional trade.</p>
<p>National Women Development Policy 2011</p>	<p>This policy was developed with the objective to establish equal rights of men and women in areas of state and public life, to ensure security and safety of women, to ensure the socio-economic, political, administrative and legal empowerment and to establish human rights of women.</p>	<p>Yes, under component 3 technical assistance provided to MoC-WTO cell to promote women empowerment and entrepreneurship is in line with the policy.</p>
<p>National Information and Communication Technology (ICT) Policy 2015</p>	<p>The objective of the National ICT policy defines in the section D9 that steps will be taken for the reduction of risk on climate change. By the innovation of environmentally friendly green technology initiatives will also be taken for safe e-waste management, climate, and disaster management. In addition to that the policy in section E defines strategic themes. The section describes the five strategies for environment, climate, and disaster management. Of this provision under sub-section E9 clearly mentions about safe management of electronic waste.</p>	<p>Applicable for the all Component, where IAs need to comply with the requirement as stated in the policy for managing e-waste in the land ports and in the custom houses.</p>
<p>National Industry Policy 2016</p>	<p>Chapter 14 of National Industry Policy 2016 highlighted environment friendly Industry management. The policy stated that Government will provide all sorts of co-operation and incentives to the local and foreign entrepreneur for managing and processing industry waste. Besides, industry entrepreneur must be influenced to follow 3R (Reduce, Reuse and Recycle) strategy for waste management.</p>	<p>Applicable for the all Component, where IAs need to comply with the requirement as stated in the policy for managing different types of waste in the land ports and in the custom houses.</p>

Policy	Key Features	Applicability
National Health Policy, 2019	We are ensuring quality healthcare facilities to everyone (including emergency health care), exclusively to the rural communities, without any discrimination on the basis of gender and economic status.	Applicable, PIUs (BLPA, NBR and MoC-WTO Cell) will ensure compliance. People will be engaged directly with this project as both Project Affected Persons (PAPs) and workers. Their health issues are one of many key issues in consideration during the project implementation.
Child Labor Elimination Policy, 2010	The main objectives of the policy are as follows: They are withdrawing working children from different forms of occupations, e.g., hazardous work and the worst forms of child labor; Providing special emphasis for indigenous and physically challenged children to bring them back to the congenial environment; Planning and implementing different short-, medium-, and long-term strategies and programs to eliminate various forms of child labor.	Yes, PIUs (BLPA, NBR and MoC-WTO Cell) should ensure that no child labor will be engaged at site for construction or operation works either directly or by the sub-contractors. PIUs should include a clause in the subcontractor agreements prohibiting employment of child labor.
Rights & Protection of Persons with Disabilities Act, 2013	Deals with disability issues from a human rights perspective and covers people with disabilities based on their impairments. Protection of people with disabilities from violence, abuse, and discrimination, as well as establishing their rights and freedoms.	Applicable, PIUs (BLPA, NBR and MoC-WTO Cell) will ensure compliance with the law.
Hazardous Waste (E-Waste) Management Rules, 2021	DoE has published the Hazardous Waste (E-waste) Management Rules, 2021 under the Bangladesh Environmental Protection Act, 1995. It covers the products listed in the Schedule (home appliances, monitoring and control equipment, medical equipment, automatic machines, IT and communication equipment), and establishes obligations for producer, dealers, assemblers, collectors, sellers, and consumers of the products. The main provisions of this regulation. <ul style="list-style-type: none"> • Defines the roles of individual stakeholders involved in the E-waste management procedure • Regulates the import export and handling of E-wastes Provides an appropriate documentation process in order to facilitate the overall waste Management implementation.	Applicable for all the Components during construction and operation phase. During the construction, wastes, spent oils, lubes, will be used for the civil work involved. The operation phase of the ports, roads and buildings will result hazardous chemicals and metals.
National 3R Strategy for Waste Management, 2020	Deals with Sustainable Resource-Efficient Economy with zero waste policy with 3Rs practices (Reduce, Reuse and Recycling).	Yes, under the all four Components wastes will be generated.

3.1.2 Relevant National Environmental and Social Legislations

The main Acts and Regulations guiding environmental and social protection and conservation in Bangladesh are outlined in Table 3.2 below. The given lists only some most important applicable key GoB acts, rules, and regulations and their relevance to this project.

Table 3.2: Summary of Applicable Environmental Laws and Regulations of GoB

Act/Rules	Key Provisions and Purpose	Applicability
Constitution of the People's Republic of Bangladesh	Bangladesh's Constitution defines the rights of every citizen irrespective of their ethnicity and religion where the State is responsible for the provision of Basic Necessities for the citizens	This is applicable to ensure the health and safety of the laborers and project-related persons.
Environment Conservation Act, 1995	<p>The Environment Conservation Act authorizes the DOE to undertake any activity to conserve and enhance the environment's quality and control, prevent, and mitigate the pollution. The DOE is designated as the regulatory body and enforcement agency for all environment-related activities. The Act enables the following critical components of DOE's remit:</p> <ul style="list-style-type: none"> i. declaration of Ecologically Critical Areas; ii. administration of the procedure for obtaining Environmental Clearance Certificates for new industrial projects; iii. regulation concerning vehicles emitting smoke harmful to the environment; iv. environmental regulations for development activities; v. standards for quality of air, water, noise, and soils (including river bed materials) for different areas and different purposes; vi. acceptable limits for discharging and emitting waste; and vii. formulation of environmental guidelines to control and mitigate environmental pollution, conservation, and improvement of the environment. <p>Amendments to the ECA in 2000, 2002, and 2010 added significant substantive and procedural scope, defining the following new areas of authority:</p> <ul style="list-style-type: none"> i. ascertaining responsibility for compensation in cases of damage to ecosystems; ii. increased provision of preventive measures, including fines and imprisonment, and the authority to take cognizance of offenses; iii. restrictions on polluting automobiles; iv. restrictions on the production and sale of environmentally harmful items like polythene bags; 	Yes, NBR sub-components and BLPA sub-components shall take environmental clearance from DoE.

Act/Rules	Key Provisions and Purpose	Applicability
	<ul style="list-style-type: none"> v. obtaining assistance from law enforcement agencies for environmental actions; vi. definition and enforcement of punitive measures; vii. authority to try environmental cases; viii. prohibition on hill cutting except where established to be in the national interest; ix. authority to regulate the management of hazardous waste produced by shipbreaking yards; x. prohibition of filling or altering waterways except when judged to be in the national interest; and xi. additional powers to compel compliance with emissions standards. 	
<p>Environment Conservation Rules, 1997 and amendments</p>	<p>These are rules promulgated under the ECA, 1995, and its amendments. The Environment Conservation Rules categorize industries and projects and identify types of environmental assessment required against respective categories of industries or projects. The Rules set:</p> <ul style="list-style-type: none"> ▪ The National Environmental Quality Standards (NEQS) for ambient air, various types of water, industrial effluent, emission, noise, vehicular exhaust, etc.; ▪ The requirement for and procedures to obtain environmental clearance; and ▪ The requirement for IEE and EIA according to industrial and other development interventions categories. <p>The Environment Conservation Rules, 1997, were issued by the GOB to exercise power conferred under the Environment Conservation Act (Section 20), 1995. Under these Rules, the following aspects, among others, are covered:</p> <ul style="list-style-type: none"> ▪ Declaration of ecologically critical areas; ▪ Classification of industries and projects into four categories; ▪ Procedures for issuing the Environmental Clearance Certificate (ECC); and ▪ Determination of environmental standards. <p>Rule 3 defines the factors to be considered in declaring an 'ecologically critical area' as per Section 5 of the ECA (1995). It empowers the Government to declare the area as an Ecologically Critical Areas (ECA) if it is satisfied that the site's ecosystem has reached or is threatened to reach a critical state or condition due to environmental degradation. The Government is also empowered to specify which operations or</p>	<p>Yes, depending on the scope, design and location of the sub-project and for the construction of new buildings and other facilities some of the old buildings/establishments have to be demolished which poses substantial risk to the project site. As such NBR and BLPA project may fall under Red category which require to conduct both IEE, ESIA, and ESMP approved by the DoE and have to deposit prescribe fees according to the schedule 13 to obtain Environmental Clearance Certificate (ECC).</p>

Act/Rules	Key Provisions and Purpose	Applicability
	<p>processes may be carried out or may not be initiated in the ecologically critical area. Under this mandate, the Ministry of Environment and Forest (MOEF) has declared Sundarbans, Cox's Bazar-Teknaf Sea Shore, Saint Martin Island, Sonadia Island, Hakaluki Haor, Tanguar Haor, Marzat Baor, Gulshan-Baridhara Lake, Buriganga River, Shitalakhya River, Balu River, Turag River, Jafflong-Dawki River as ecologically critical areas and prohibited certain activities in those areas.</p> <p>Rule 7 of the 1997 ECR categorizes industrial units and projects into four categories, depending on environmental impact and location. These categories are:</p> <ul style="list-style-type: none"> ▪ Green; ▪ Orange A; ▪ Orange B; and ▪ Red. <p>The categorization of a project determines the procedure for issuing an Environmental Clearance Certificate (ECC). All proposed industrial units and projects considered low polluting are categorized under "Green" and shall be granted Environmental Clearance. These are Orange B for work that requires Initial Environmental Examination (IEE) and Red for work that requires full environmental assessment.</p> <p>A detailed description of those four categories of industries has been given in Schedule-1 of ECR'97. Apart from general requirements, for every Red category proposed industrial unit or project, the application must be accompanied with a feasibility report on Initial Environmental Examination, Environmental Impact Assessment based on approved TOR by DOE, Environmental Management Plan (EMP), etc.</p> <p>Depending upon location, size, and severity of pollution loads, projects/activities have been classified in ECR, 1997 into four categories: Green, Orange A, Orange B, and Red respectively, to nil, minor, medium, and severe impacts on important environmental components (IECs). Corresponding categories of road projects are based on:</p> <p><u>Red Category</u></p> <ul style="list-style-type: none"> ▪ Considering the project construction activities, this project falls under the Red category. 	
Environment Court Act, 2010	<p>The Environment Court Act, 2010, has been enacted to establish environmental courts in each administrative district of Bangladesh. This Act sets out policy for effective pursuance and completion of legal proceedings related to environmental crimes. Under this Act, the Director General of the DOE has the power to impose heavy penalties on industrial polluters who are dumping untreated wastewater into the environment or not operating their legally mandated ETPs.</p>	<p>According to this Act, government can take legal actions if any environmental problem or irregularities occurs due to any sub-project interventions of NBR, BLPA, and MoC.</p>

Act/Rules	Key Provisions and Purpose	Applicability
Forest Act 1927 (Amended 2000)	The Act empowers the government to regulate the felling, extraction, and transport of forest produce in the country.	Yes, sub-projects may include felling of trees and social forestry.
Forest Product Transit Rule 2011	If it is necessary to remove or transport forest products from such government owned land which is not under the control of the forest department, approval has to be obtained by applying to the forest department in a prescribed form.	Yes, respective proponents may have to apply to the local forest department if any trees need to be cut on the premises of the sub-projects.
The EIA Guidelines for Industry (1997)	The EIA Guidelines is a handbook defining procedures for preparing EIAs and reviewing them, ready for the benefit of the development partners, EIA consultants, reviewers, and academicians.	The Guidelines provide a step-by-step methodology for the completion of EIAs.
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 introduced a myriad of updated laws added new definitions for what constitutes an offense. Most of the fines and punishments received significant bumps.	Yes, sub-projects of NBR and BLPA will use heavy vehicles, deploy drivers and operators of machineries.
Bangladesh Labor Law, 2006 (amendment 2018)	<p>It is a comprehensive law covering labour issues such as: conditions of service and employment, youth employment, benefits including maternal benefits, compensation for injuries, trade unions and industrial relations, disputes, participation of workers in company's profits, regulation of safety of dock workers, penalty procedures, administration and inspection.</p> <p>This Act pertains to the occupational rights and safety of factory workers and the provision of a comfortable environment for working. It also includes rules on registration of labourers, misconduct rules, income and benefits, health and fire safety, factory plan. The amendment of 2018 further ensured the occupational health and safety rights of the worker by replacing some of the clauses of 2006 law, such as: paid leave and associated facilities, parental leave etc.</p>	<p>Compliance to provisions on employment standards, occupational health and safety, welfare and social protection, labor relations and social dialogue, and enforcement.</p> <p>Prohibition of employment of children and adolescents.</p>
Bangladesh Labor Rules, 2015	Includes rules on registration of laborers, misconduct rules, income and benefits, health and fire safety, factory plan	Contractors to implement occupational health and safety measures
Bangladesh National Building Code (BNBC), 2020	The Bangladesh National Building Code (BNBC) 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 BNBC also stipulates the general duties of the employer to the public as well as workers.	Yes, it is applicable for NBR sub-project components which includes construction of new office buildings, residential buildings, substation generator, laboratory, warehouse, data center, multistoried buildings, public plaza , landing centers, improvement of road etc.
Medical Waste (Management and Treatment) Rules 2008	<p>The Government of Bangladesh promulgated the Medical Waste (management and processing) Rule, 2008 for processing and management of MW in Bangladesh. It was prepared through the active participation of MOHFW to manage medical waste and protect the environment properly.</p> <p>The Medical Waste (Management and Treatment) Rules 2008 forms the management base of all medical waste. The rules are applicable only to waste management facilities/operators, i.e., those involved in the transportation, treatment, and medical waste disposal. The law provides for guidance on the collections, storage treatment, and disposal of</p>	According to these rules, the government can take legal actions if any environmental problem occurs due to project interventions.

Act/Rules	Key Provisions and Purpose	Applicability
	<p>medical waste for management facilities/operators. The institutions or agencies involved in collecting, transporting, and storage have to obtain authorization from the Department of Environment.</p> <p>The existing Environment Conservation Act, 1995 and the Environment Conservation Rules, 1997 had no specific laws directly related to management of MW management. According to Bangladesh Environment Conservation Act wastes are classified under section 2(1) as “any liquid, solid and radioactive substance that is discharged, disposed or dumped which may cause adverse/ negative change to the environment.” All these procedures were very general for all kinds of establishments and not specific for the Management of MW. The shortcoming has been addressed by the new medical waste rules, 2008.</p> <p>Broadly the rule has classified the medical waste (schedule-1) with examples and environment-friendly management technologies. It also contains suggestions for using different color bins (schedule-3) for segregation of medical –waste at source and symbols to be used on the packaging of medical waste (schedule-4) for transporting. In schedule -6, the rule specifies the standard Incineration/ Autoclaving, standard of liquid waste with permissible limits, standard of microwaving, standard for deep burial, and standard for radioactive waste treatment and disposal, along with other issues related to MWM. The new medical waste rule has urged for ‘formation of authority within three months of proclamation. The authority will be in charge of all activities related to MWM of their area.</p> <p>The regulation specified for different (6 nos.) color bins to be used for segregation of varying MW along with the specification of the container, standard for operation of equipment, effluent and emission standards.</p>	
The Water Supply and Sanitation Act (1996)	Regulates the management and control of water supply and sanitation in urban areas.	Yes, sub-projects of NBR and BLPA will include construction of water supply and sanitation facilities
The Ground Water Management Ordinance (1985)	Describes the management of ground water resources and licensing of tube wells	Yes, construction sites of the sub-projects may require deep tube wells for meeting up water use.
Bangladesh Wildlife (Protection and Preservation) Act 2012	The Act (Schedule 1 and 2) 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, some of the listed endangered species may be present in the sub-component areas.
Biodiversity Act, 2017	It provides for creating the National Committee and the Biodiversity Management and Surveillance Committees at local levels (i.e., Districts, Upazilas, Municipalities, and Unions). In general, all these	Yes, all sub-project components need to include local city corporation committees, so that

Act/Rules	Key Provisions and Purpose	Applicability
	committees are mandated to assist the Government in implementing the National Biodiversity Strategy and Action Plan (NBSAP) and visiting the biodiversity enriched areas in their respective territories; and monitoring the progress of implementation NBSAP.	they can monitor project impact on the local biodiversity.
Public Procurement Rules (2008)	Applies to the procurement of goods, works, or services by any government, semi-government, or any statutory body established under any law; includes measures regarding the safety, security, and protection of the environment in construction works; requires contractors to take all reasonable steps to safeguard the health and safety of all workers on site, protect the environment on and off the site, and avoid damage or nuisance to persons or property of the public or others	The PPR (2008) will be followed during the procurement process of the subprojects
Rules for Removal of Wrecks and Obstructions in inland Navigable Water Ways (1973)	Rules for removal of wrecks and obstructions	Yes, if obstruct natural canals/rivers or any other natural water ways (includes seasonal water bodies).
Acquisition and Requisition of Immovable Property Act of 2017	The principal legal instrument governing land acquisition in Bangladesh is the Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017. The ARIPA 2017 requires that compensation be paid for (i) land and assets permanently acquired (including standing crops, trees, houses); and (ii) any other damages caused by such acquisition. The Act also provides for the acquisition of properties belonging to religious organizations like mosques, temples, pagodas and graveyards if they are acquired for public interest.	Relevant to the sub-project components of BLPA. In case of NBR sub-components no land acquisition is required but, if Land Acquisition (LA) and rehabilitation is required then NBR will duly prepare a LAP and Resettlement Action Plan (RAP) following the ARIPA 2017 requirement and ESS-5 of the World Bank.
Right to Information Act, 2009	The Act makes provisions for ensuring free flow of information and people's right to information. The freedom of thought, conscience and speech is recognized in Bangladesh Constitution as a fundamental right and the right to information is an alienable part of it. The right to information Act ensures that transparency and accountability in all public, autonomous and statutory organizations and in private organizations run on government or foreign funding shall increase, corruption shall decrease and good governance shall be established.	Yes, provision for public information disclosure will be ensured in all phases of the project development life cycle.
Bangladesh Water Act 2013	As per this Act, all forms of water (e.g., surface water, ground water, sea water, rain water and atmospheric water) within the territory of Bangladesh belong to the government on behalf of the people. Without prior permission issued by the Executive Committee (EC), no individuals or organizations will be allowed to extract, distribute, use, develop, protect, and conserve water resources, nor they will be allowed to build any structure that impede the natural flow of rivers and creeks.	Applicable if the infrastructure reconstruction/rehabilitation activities impede the natural flow of rivers, canals or any seasonal water bodies. In such cases prior permission from the EC will be required.
The Noise Pollution Control Rules, 2006	The Noise Pollution Control Rules have been established to manage noise-generating activities which have the potential to impact the health and wellbeing of workers and the surrounding communities.	Applicable since minor to moderate noise emission is expected from project activity during construction phase under the different components.
The Antiquities Act (1968)	Describes the preservation of cultural heritage, historic monuments and protected sites. It	It may be applicable to the sub-projects areas in case it identifies elements of cultural, historic and protected values.

Act/Rules	Key Provisions and Purpose	Applicability
<p>The Acquisition and Requisition of Immovable Property Act 2017 (ARIPA)</p>	<p>It is the principal legislation governing eminent domain land acquisition in Bangladesh. The Act requires that compensation be paid for: (i) land and assets permanently acquired (including standing crops, trees, houses); and (ii) any other damages caused by such acquisition. The Act also provides the acquisition of properties belonging to religious organizations like mosques, temples, pagodas, and graveyards if acquired for the public interest. The Ministry of Land (MoL) is the authorized government agency to undertake the process of land acquisition. The MoL partly delegates its authority in relation to land acquisition to the Commissioner at Divisional level and to the Deputy Commissioner at the District level. The Deputy Commissioners (DC) is empowered by the MoL to process land acquisition under the Act and pay compensation to the legal owners of the acquired property. Khas (government-owned land) should be acquired first when a project requires both Khas and private land. If a project requires only khas land, the land will be transferred through an inter-ministerial meeting following the acquisition proposal submitted to DC or MoL. The Government of Bangladesh does not have a national policy on involuntary resettlement. The new Act of 2017 has incorporated specific provisions to address social and economic impacts that were not previously included in the 1982 land acquisition ordinance. Therefore, these provisions under the new law would reduce the gaps between the national legislative framework of the government and WB policies.</p>	<p>The nature of the civil works related to the project will entail the land acquisition and subsequent economic and physical displacement. ARIPA 2017 defines the land acquisition process and contains pertinent information related to a compensation payment to titleholders.</p>
<p>Bangladesh Labor Act, 2006 (amended in 2013, 2015 and 2018)</p>	<p>The Act provides the guidance on employer's extent of responsibility and workers' extent of rights to compensation in case of injury by accident while working. It also gives a general framework for Occupation Health and Safety (OHS), welfare, and working conditions of workers.</p> <p>A number of sections provide the duties of employers, including conditions of service and employment (sections 3-33), working hours and leave (sections 100-119), payment of wages (sections 120-137), determination of minimum wage (sections 138-149), and compensation for injuries to workers (sections 150-174). The Act also specifies provisions on maternity benefits (sections 45-50), health (sections 51-60), safety (sections 61-88), and labor welfare (sections 89-99).</p> <p>This is a comprehensive legislation and addresses three area-</p> <ul style="list-style-type: none"> (i) Conditions of service and employment including wages and payment, the establishment of Wages Boards, employment of young people, maternity benefits, working hours and leave; (ii) Health, safety, hygiene, and welfare, and compensation for injury; (iii) Trade unions and industrial relations. <p>The law applies to all "establishments" which are defined broadly to include, shops, hotels, restaurants, factories (though these must employ more than five</p>	<p>Yes, The policy with the relevant acts and rules are applicable to the sub-project activities of NBR which involves demolition, construction /re-construction/ renovation/ widening of customs house, training academy, buildings, roads and other utility infrastructures requiring labor from local and external areas. In BLPA components also have some activities will require labour from local and external areas.</p>

Act/Rules	Key Provisions and Purpose	Applicability
	laborer’s), plantations, docks, transport services, construction sites, and “any premises in which laborers are employed for the purposes of carrying on any industry”. It covers contractors (and its operations at construction sites) however it is not clear if the law applies to development project organizations which are "ad hoc" and with co-terminus staff with the project.	
Constitutional Rights of the Tribal People	The Constitution of Bangladesh ensures affirmative action for small ethnic communities and prohibits discrimination inter alia on the grounds of race, religion, or place of birth, Article 23A of which provides, “the State shall take steps to protect and develop the unique local culture and tradition of the tribes, minor races, ethnic sects, and communities.” It also spells out in Article 28 (4), “nothing in this Article shall prevent the State from making special provision in favor of women or children or for the advancement of any backward section of citizens.”	Applicable, under the component 1, for the implementation of the construction work in different land port locations.

3.2 Applicable International Treaties Signed by the GoB

Bangladesh has signed most international treaties, conventions, and protocols on the environment, pollution control, biodiversity 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. An overview of the relevant international treaties signed by GoB is shown in Table 3.3.

Table 3.3: International Conventions, Treaties, and Protocols Signed by Bangladesh

Treaty	Year	Brief Description/Relevance to NBR/BLPA
Paris Agreement (under UNFCC) (Paris)	2015	Global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.
Convention on Biological Diversity, commonly known as CBD	1992	Promote the sustainable use of its components; and encourage fair and equitable sharing of benefits arising from genetic resources.
Cartagena Protocol on Biosafety to the Convention on Biological Diversity	2000	To help protect the environment and ensure the safe handling, transport and use of living modified organisms (LMOs)
Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization to the Convention on Biological Diversity	2010	Nagoya Protocol is a supplementary agreement to the CBD. It provides a transparent legal framework for the implementation of one of the three objectives of the CBD
Protection of birds (Paris)	1950	Protection of birds in wild state Broadly applicable for birds in and around the project influence area; mitigation measures included in ESMP address potential impacts on birds as well.
Ramsar Convention	1971	Protection of wetlands. Broadly applicable for wetlands in and around the project influence area; mitigation measures included in ESMP address potential impacts on wetlands and associated resources as well.
Protocol on Waterfowl Habitat	1982	Amendment of Ramsar Convention to protect specific habitats for waterfowl. Broadly applicable for wetlands in and around the project influence area; mitigation measures included in ESMP address potential impacts on wetlands and associated ecological resources as well.
World Cultural and Natural Heritage (Paris)	1972	Protection of major cultural and natural heritages. Not applicable since no major cultural or natural monuments are known to exist in the project influence area.

Treaty	Year	Brief Description/Relevance to NBR/BLPA
CITES convention	1973	Ban and restrictions on international trade in endangered species of wild fauna and flora. Not directly relevant to the NBR since the project does not involve in any international trade of endangered species of wild fauna and flora. General restrictions have however been included in the Environmental Code of Practice.
Bonn Convention	1979	Conservation of migratory species of wild animals. Broadly applicable to the migratory birds in and around the project influence area. Project activities are not likely to have any significant impacts on these species; precautionary measures have nonetheless been included in ESMP.
Prevention and Control of Occupational hazards	1974	Protect workers against occupational exposure to carcinogenic substances and agents. Broadly applicable to the construction and O&M activities under the project. Appropriate mitigation and protective measures will be included in the ESMP.
Occupational hazards due to air pollution, noise & vibration (Geneva)	1977	Protect workers against occupational hazards in the working environment. Broadly applicable to the construction and O&M activities under the project. Appropriate mitigation and protective measures will be included in the ESMP.
Occupational safety and health in working environment (Geneva)	1981	Prevent accidents and injury to health by minimizing hazards in the working environment. Broadly applicable to the construction and O&M activities under the project. Appropriate mitigation and protective measures will be included in the ESMP.
Occupational Health Services	1985	To promote a safe and healthy working environment, broadly applicable to the construction and O&M activities under the project appropriate mitigation and protective measures will be included in the ESMP.
Convention on oil pollution damage (Brussels)	1969	Civil liability on oil pollution damage from ships. Not applicable since no oil carrying cargos are involved in the proposed project.
Safety in use of chemicals during work	1990	Occupational safety of use of chemicals in the work place. Broadly applicable to the construction and O&M activities under the project. Appropriate mitigation and protective measures will be included in the ESMP.
Convention on oil pollution	1990	Legal framework and preparedness for control of oil pollution. Broadly applicable to the construction and O&M activities under the project. Appropriate mitigation and protective measures will be included in the ESMP.
UN framework convention on climate change (Rio de Janeiro)	1992	Regulation of greenhouse gases (GHGs) emissions. Broadly applicable to the construction and O&M activities under the project. Appropriate mitigation and protective measures will be included in the ESMP to minimize emissions of GHGs.
International Convention on Climate Changes (Kyoto Protocol)	1997	International treaty on climate change and emission of greenhouse gases. Broadly applicable to the construction and O&M activities under the project. Appropriate mitigation and protective measures will be included in the ESMP to minimize emissions of GHGs.

3.3 World Bank's Environmental and Social Framework (ESF)

Since October 01, 2018, all WB-funded Investment Project Financing (IPF) are required to follow the ESF consisting of ten (10) Environmental and Social Standards (ESS). These ESSs set out their requirement for the borrowers to identify and assess environmental and social risks and impacts associated with any project. The ESSs support the borrowers in achieving good international practice relating to environmental and social sustainability, assisting them in fulfilling their national and international

environmental and social obligations, enhancing transparency and accountability, and ensuring sustainable development outcomes through ongoing stakeholder engagement.

The proposed program's key environmental and social risks and impacts are anticipated to occur mainly during construction and within existing footprints. Key results include: (i) health & safety of workers and communities within the corridor and along the transport routes of construction supplies, materials, and equipment; (iii) exposure of the population in urban and semi-urban centers along the project area and transport routes to noise, vibrations, air pollution and safety risks; (iv) siltation and sedimentation of waterways close to the physical works; (v) land acquisition along the expanded ROW; (vi) physical displacement of structures; (vii) temporary economic displacement of some vendors and businesses along the ROW; and, (viii) increased risk of SEA/SH and road accidents.

All ESSs will be applicable in the project, except the ESS 9: Financial Intermediaries, WB's legal policies for Projects on International Waterways (OP 7.50) as there is no International Waterways within project areas, and Project Disputed Areas (OP 7.60) as there is no dispute on project area land. The overall environmental and social risk rating for the first phase of the Program is 'High' due to the scale of civil works and physical footprints. If ESRC is changed, this will require WB's approval and updating of this ESMF. The section below discusses the relevance of ESF Policy, each of the ten standards (ESS1 to 10), and associated Directive; their requirements are tabulated in Table 3.4. It also discusses the relevance and requirements relating to other guidance notes of the World Bank. If the requirements of Bangladesh law differ from those of ESF, the more stringent requirements will apply.

Table 3.4: WB ESS Requirements and Relevance to the Project

World Bank ESS Policies, Standards, Directives	Objectives	Requirements	Relevance to the sub-project/ project
ESS-1 Assessment and Management of Environmental and Social Risks and Impacts	Identify, assess, evaluate, and manage the environmental and social risks and impacts in a manner consistent with the ESF. Adopt differentiated measures so that adverse consequences do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities	E&S risk and impacts should be considered in the environmental and social assessment. The use and strengthening of the Borrower's ESF of the evaluation, development, and implementation of World Bank financed projects where appropriate. Relevant GoB Laws/ Regulation (a) ECA 1995 (b) ECR 1997 and EIA guidelines for Industries	Relevant. ESMF has been prepared; which provides guidelines for screening of targeted sub-project components for environmental and social risks and based on the E&S screening results, further sub-project specific ESIA and ESMPs will be prepared during the implementation of the project. The ESMF also provides recommendations on the capacity building of the implementing agencies'.
ESS-2 Labor-and-Working-Conditions	Promote safety and health at work. Promote fair treatment, non-discrimination, and equal opportunity for 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	Requirements for the Borrower to prepare and adopt labor management procedures. Provisions on the treatment of direct, contracted, community, and primary supply workers and government civil servants. Requirements on terms and conditions of work, non-discrimination, equal opportunity, and workers' organizations. Provisions on child labor and forced labor. Requirements on occupational health and	Relevant. During the construction and operation of different infrastructures and roads, the project will involve the employment of direct workers and contracted workers. The project has developed a separate Labor Management Framework, which covers the issues and concerns of laborers and workers employed/likely to be employed by the PIUs. The salient points will be addressed in the ESMF and appropriate requirements will be incorporated in Management of Contractors

World Bank ESS Policies, Standards, Directives	Objectives	Requirements	Relevance to the sub-project/ project
	national law. Provide project workers with accessible means to raise workplace concerns.	<p>safety, in keeping with the World Bank Group's Environmental, Health, and Safety Guidelines (EHSG).</p> <p>Relevant GoB Laws/Regulation</p> <ul style="list-style-type: none"> a) Labor Law 2006 (Amendment 2013) b) Occupational Health and Safety Policy 2013 c) Public Procurement Rule 2008 	documents. A separate workers GRM will be developed as per the requirement of ESS2. The project will also provide training on waste management practices and OHS related practices to the PIU's officials, personnel and labors.
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 mitigate project-related emissions of short and long-lived climate pollutants. Avoid or minimize the 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 energy consumption, water, and raw materials and introduces specific requirements for water efficiency where a project has high water demand.	Requires an estimate of gross greenhouse gas emissions resulting from project (unless minor), where technically and financially feasible. Requirements for managing wastes, chemical and hazardous materials, and provisions address historical pollution. ESS-3 refers to national law and Good International Industry Practice, in the first instance the World Bank Groups' EHSGs. Furthermore, the sub-projects are expected to be in line with standards which is more stringent (GoB legislation vs WBG EHSGs)	Relevant. The ESMF will assess the potential pollution impact and provide recommendations for systemic improvement of solid waste management including e-waste and general construction waste. The implementing agency NBR, MoC and BLPA will ensure the execution of the waste management plans throughout the project implementation period. These implementing agencies will also ensure green and resilient design for reconstruction/renovation of sub-project infrastructure along with an action plan to achieve expected outcomes in having safe running water; functioning and clean toilettes with adequate sewage management systems, liquid waste processed before discharge. With respect to Pollution Management, based on past project experiences by BLPA, MoC and NBR, the project will develop, as part of the ESA process, prevention and management measures to offset risks and impacts of pollution from potential sources such as dust and emission from operation of hot-mix and batching plants, crushers, construction and haulage vehicles, material and spoil stockpile; effluents and wastewater from labor camps, construction camp; spillage or leakage during handling of chemical admixtures, hazardous materials like bitumen, high strength diesel, used oil, battery wastes etc.; and disposal of non-hazardous wastes (municipal wastes) generated during project implementation period.

World Bank ESS Policies, Standards, Directives	Objectives	Requirements	Relevance to the sub-project/project
<p>ESS-4 Community-Health-and-Safety</p>	<p>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 adequate measures to address emergency events. Ensure that safeguarding personnel and property are carried out to avoid or minimize risks to the project-affected communities.</p>	<p>Requirements on infrastructure, considering safety and climate change and applying the concept of universal access, where technically and financially feasible. Requirements on traffic and road safety, including road safety assessments and monitoring. Addresses risks arising from impacts on provisioning and regulating ecosystem service. Measures to avoid or minimize the risk of water-related, communicable, and non-communicable diseases. Requirements to assess risks associated with security personnel and review and report unlawful and abusive acts to relevant authorities.</p> <p>GoB Laws and Regulation</p> <ul style="list-style-type: none"> a) National Road Transport Act b) ECR 1997 c) BLA 2006 d) Public Procurement Rule,2008 e) Water Act 2013 	<p>The ESS is relevant.</p> <p>In the NBR/BLPA sub-project components there is likely to be i) road excavation, 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 at road sections traversing settlement area with limited carriageway/roadway width, and sensitive receptors such as schools, religious place, health center/hospitals; iii) high dust levels from earthworks/slope cutting, high noise and emission level from traffic congestion and idling of vehicles; and iv) influx of migrant workers could potentially cause local discomfort or potential conflicts with local people.</p> <p>Sub-project specific ESIA's and ESMPs for BLPA, MoC and NBR with relevant mitigation measures and monitoring plan will be prepared for the construction/operation phase of the project;</p> <p>Considering the potential SEA/SH risks of the project interventions Life and Fire Safety (LF&S) measures, Emergency Response and Evacuation Plan, Capacity Building and Training measures for in-house staff in accordance with IFC LF&S good practices and relevant GRM will be included in the ESMF and executed by the PIU. Also, this ESS will include the risks of COVID-19 and their respective initiatives to limit its spread.</p>
<p>ESS-5 Land-Acquisition-Restrictions-on-Land-Use-and-Involuntary-Resettlement</p>	<p>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 before the</p>	<p>Applies to permanent or temporary physical and economic displacement resulting from different types of land acquisition and restrictions on access. It does not apply to voluntary market transactions, except where these affect third parties. Provides criteria for “voluntary” land donations, sale of community land, and parties obtaining income from illegal rentals. Prohibits forced eviction (removal against the will of affected people, without legal and other protection including all</p>	<p>A separate RPF and RAP has been prepared to address ESS5. The land will be required for widening, up-gradation works in identified sub-projects and possibly rehabilitation works, curve/geometric improvements, blind spots, construction of markets and other infrastructures, etc. Hence impacts on land, private, and community-owned assets, including structures, trees, and crops within existing and proposed ROW, are likely. Physical and economic displacement, too, is very likely. The guideline provided in the RPF associated with this ESMF will be followed for this project to provide appropriate</p>

World Bank ESS Policies, Standards, Directives	Objectives	Requirements	Relevance to the sub-project/project
	beginning of project implementation, whichever is higher. Improve living conditions of poor or vulnerable persons who are physically displaced by providing adequate housing, access to services and facilities, and security of tenure. Conceive and execute resettlement activities as sustainable development programs.	applicable procedures and principles in ESS5). Requires that acquisition of land and assets is initiated only after payment of compensation and resettlement has occurred. Requires community engagement and consultation, disclosure of information, and a grievance mechanism. GoB Laws and regulation Acquisition and Requisition of Immovable Property Act, 2017	compensation to title and non-title holders. The project is not expected to require any land acquisition nor restriction use of land as Government owned land will be used for NBR sub-project components. In case the sub-project components cause any adverse impacts/displacement to squatters/informal settlers, restoration plan shall be prepared and adopted as per the RPF prepared for the sub-project.
ESS-6 Biodiversity-Conservation and Sustainable Management of Living Natural Resources	Protect and conserve biodiversity and habitats. Apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could impact biodiversity. To promote the sustainable management of living natural resources.	Requirements for projects affecting areas that are legally protected designated for protection or regionally/internationally recognized to be of high biodiversity value. The requirements for sustainable management of living natural resources, including primary production and harvesting, distinguish between small-scale and commercial activities. Provisions relating to primary suppliers, where a project purchases natural resource commodities, including food, timber, and fiber.	Site clearance activities for road and building constructions will involve removing vegetation and felling of trees. In such cases, site-specific plantation plan will be prepared in addition to the ESMP to compensate loss of trees. However, proposed construction works likely to have no such significant impacts on the natural habitats nor cause harm to the biodiversity. No Protected Area have been identified during the project preparation. However, sub-projects ES screening will further investigate presence of threatened animals and significant natural habitats. Presence of such PA, threatened species or natural habitats will be managed through appropriate mitigation measures following the ESS6.
ESS-7 Indigenous-Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	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 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 the Free, Prior, and Informed Consent (FPIC) of affected parties in three	Applies when the Indigenous Peoples are present or have a collective attachment to the land, whether they are affected positively or negatively regardless of economic, political, or social vulnerability. The option to use different terminologies for groups that meet the criteria set out in the Standard. The use of national screening processes, providing these meet World Bank criteria and requirements. Coverage of forest dwellers, hunter-gatherers, pastoralists, and other nomadic groups. Requirements for meaningful consultation tailored to affected parties	Not relevant to this project. Hence no differential provisions will be required to address the impacts on these households. However, if any SEC is identified during project implementation, a separate SEVCDP followed by a SEVCDP will be prepared.

World Bank ESS Policies, Standards, Directives	Objectives	Requirements	Relevance to the sub-project/ project
	circumstances. Recognize, respect, and preserve the culture, knowledge, and practices of Indigenous Peoples and provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.	and a grievance mechanism. Requirements for a free, prior and informed consent process in three circumstances.	
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.	Requires a chance finds procedure to be established. Recognition of the need to ensure peoples' continued access to culturally important sites and the need for confidentiality when revealing information about cultural heritage assets that would compromise or jeopardize their safety or integrity. Requirement for fair and equitable sharing of benefits from the commercial use of cultural resources. Provisions of archaeological sites and materials, built heritage, natural features with cultural significance, and moveable cultural heritage. Relevant GoB Laws/ Regulation (a) National Culture Policies (b) Antiques law 1968	It is not sure to have any ancient monuments and/or archaeological site(s), protected, and religious structures/shrines of local importance. This ESMF has suggested a guideline to address the ESS8. In case of any chance findings, chance find procedures will be incorporated in the ESMF and chance find clauses will be incorporated in work contracts with contractors.
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 sound environmental and social management practices in the subprojects the FI finance. Promote good environmental and sound human resources management within the FI.	Financial Intermediaries (FIs) to have an Environmental and Social Management System (ESMS) - a system for identifying, assessing, managing and monitoring the environmental and social risks and impacts of FI subprojects on an ongoing basis. FI to develop a categorization system for all subprojects, with special provisions for subprojects categorized as high or substantial risk. FI borrowers to conduct stakeholder engagement in a manner proportionate to the risks and impacts of the FI subprojects.	Not relevant as there is no financial intermediary involved.
ESS-10 Stakeholder-Engagement-and-	Establish a systematic approach to stakeholder engagement that helps Borrowers identify	Requires stakeholder engagement throughout the project life cycle, and preparation and	A separate SEP has been prepared to address ESS10. Relevant as the project will involve a wide variety of stakeholders

World Bank ESS Policies, Standards, Directives	Objectives	Requirements	Relevance to the sub-project/project
Information-Disclosure	stakeholders and maintain a constructive relationship with them. Assess stakeholder interest and support for the project and enable stakeholders' views to be considered 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.	implementation of a Stakeholder Engagement Plan (SEP). Requires early identification of stakeholders, both project-affected parties and other interested parties, and clarification on how effective engagement takes place. Stakeholder engagement to be conducted in a manner proportionate to the nature, scale, risks and impacts of the project and appropriate to stakeholders' interests. Specifies what is required for information disclosure and to achieve meaningful consultation. GoB Laws/Regulation No Specific Policy or Legislation identified	during its project cycle that are associated with activities under other components of the project such as Road Safety. The project will ensure: I) Relevant stakeholders for the project are correctly identified. II) Stakeholders have been consulted during the preparation of the SEP for the duration of the project. (III) Stakeholders' engagement plan has been prepared to follow during the implementation of the project.
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 subprojects by BLPA/NBR. However, risks of GBV/SEA/SH will be moderate 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 if it intensifies during the design, construction and operation of the project.
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

3.4 Classification of the Project According to the Environment Conservation Rules (ECR) and Requirement for Environmental Clearance Certificate (ECC)

The legislations relevant for environmental assessment for BBIN-MPA program components are the ECA 1995 and the ECR 1997, and subsequent amendments. In order to set an illustrative directive for abiding by the Act, Bangladesh Government through the ECR 1997 and its subsequent amendments, as specified in rule 7(2), lists the different types of industrial projects into four categories namely, Green, Orange A, Orange B, or Red, based on severity of its potential environmental impacts. Environmental clearance can be granted at various tiers depending on the category of project to which an industrial activity belongs. 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, BLPA, NBR, and MoC-WTO Cell of the BBIN-MPA program are obliged to abide by all these Acts and rules, in addition of other GoB Acts, rules or guidelines.

As per ECR 1997 amended 2010 and subsequent amendments, due to the planned project interventions and the nature of activities, the BBIN-MPA program, Phase 1 in Bangladesh falls under Red category and ESIA will be required for upgrading existing inland port facilities at Benapole, Bhomra, Burimari (Component 1, BLPA); construction of several multi-storied buildings (NBR will construct a multi-storied residential building, Bungalow, office building, Multipurpose Hall, Dormitories) school building, cyclone shelters, markets, local government office building, etc.) in the residential/commercial complex area under the customs house and training academy (Component 2, NBR. It is the responsibility of the PIUs i.e., BLPA, NBR and, MoC-WTO Cell and RHD to conduct ESIA in accordance with the ESMF and get ECC from DoE. ESIA study and Environment clearance will be obtained by the respective PIUs from the DG, DoE.

The environmental clearance procedure for Red 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.

3.5 Gap Analysis of World Bank Requirements and National Laws

A gap analysis between WB's ESF and GoB Regulations was conducted as part of the E&S capacity assessment of the BBIN-MPA program in light of the Overview Assessment of Bangladesh's Country Framework for Addressing Environmental Risks and Impacts of Development Projects (September 2021). The results of the gap analysis indicated the Bangladesh EIA System has a few material gaps with respect to the WB ESS1.

Foremost among these are: (i) BD national laws does not cover many of the issues relating to other WB ESSs; (ii) the stakeholder engagement during the EIA study is almost non-existent or very limited, needless to say, that there is no requirement to engage stakeholders during construction; (iii) it does not emphasize the application of mitigation hierarchy in selecting mitigation measures; (iv) it recognizes only Initial Environmental Examination (IEE) and Environmental Impact Assessment (EIA) and does not provide for other assessment instruments, particularly Strategic Environmental Assessment (SEA), Regional Environmental Assessment (REA), Cumulative Impact Assessment (CIA); and, (v) it does not require analysis of alternatives and associated facilities. It has also a few problems of its own when compared to a standard EIA system, including: (i) it does not provide any formal definition of the projects to be required the Environmental Clearance--the law only refers to "industry" and "industrial units"; (ii) the screening process is inadequate--there is no procedure or criteria for determining which category a project would fall into; and (iii) it does not have formal procedure for compliance monitoring and reporting. Although there are suggestions in the EIA Guidelines on these issues, the Guidelines does not have the same compelling effect as the force of law or regulation. There is no assurance that each ES 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.

It has also a few problems of its own when compared to a standard ESIA process applied following GIIP , including but not limited to: (i) it does not provide any formal definition of the projects to be required the Environmental Clearance--the law only refers to "industry" and "industrial units"; (ii) the screening process is inadequate--there is no procedure or criteria for determining which category a project would fall into; and (iii) it does not have formal procedure for compliance monitoring and reporting.

Although there are suggestions in the EIA Guidelines on these issues, the Guidelines does not have the same compelling effect as the force of law or regulation. There is no assurance that all relevant ESSs (1-8 and 10) will be well covered in the ESIA processes and final Report including ESMPs and monitoring / supervision measures. Although GoB the EIA requirements lean heavily towards the environmental aspects, in recent years more and more social issues are being incorporated in the assessment. Moreover, the practice under normal circumstances does not include labor and OHS management issues.

Another critical gap pertains to lack of provisions for requiring the preparation of project specific ESMPs. On the social side, the eminent domain land acquisition system for example does not require the preparation of Resettlement Action Plan (RAP). There are some gaps between the existing land acquisition law of the country and ESS 5 on Involuntary Resettlement in terms of identification of affected persons and compensation packages and participation of community groups of diverse interests and vulnerabilities. There are also no provisions to formulate Labor Management Procedures/Plans (LMP).

Suggested gap-filling measures are given in 3.5. Given the gaps, this ESMF will follow the most stringent standards and requirement.

Table 3.5: Gaps Minimization between GoB laws and WB’s ESSs

WB ESF Standard	Gap Minimization
ESS-1: Assessment and Management of Environmental and Social Impacts and Risks	ESMF has suggested following the ESS-1 requirements, given in the relevant sections of environmental management procedures. In case, DoE rules/ regulations do not cover the ESS requirements, and relevant clauses should be added in the financial agreements and project appraisal document to follow the more stringent safeguard requirements according to WB ESF. ESS1 requirements will also inform the E&S requirements of the sub-project ESIA/ESMPs and these will be used in sub-project bidding documents.
ESS-2: Labor and Working Conditions	Under this project, a LMP has been prepared to regulate working conditions and management of worker relations including workers specific GRM, terms and conditions of employment, non-discrimination and equal opportunity, protection of the workers’ rights to form unions and engage in collective bargain, protection of work force, prohibition of child/forced labor and provision of occupational health and safety (OHS).
ESS-3: Resource Efficiency and Pollution Prevention and Management	ESMP to be developed for BBIN-MPA program component 1, 2, and 4 will address this issue and incorporate mitigation measures for pollution prevention and will include guidance for efficient use of natural resources.
ESS-4: Community Health and Safety	The gaps will be addressed through appropriate provisions in sub-project ESIA/ESMPs and covered in the ESMP guidance part of this ESMF. In addition, contractor, operators will be responsible to prepare and implement the Contractor Environmental and Social Management Plan (C-ESMP) regarding community and occupational health and safety which includes OHS plan, traffic and road safety management plan etc. Besides, a SEA/SH has been prepared at the appraisal stage. Risks assessment and management plan for custom facilities and building will be performed as part of the ESIA/ESMP, and appropriate management plans compliant with Good International Industry Practices (GIIP) will be prepared. Similarly, as part of the ESIA process, a Security Risk Assessment will be prepared, and commensurate Security Management Plans will be developed for each site.

WB ESF Standard	Gap Minimization
ESS-5: Land Acquisition, Land Use Restriction, and Involuntary Resettlement	The project may require land acquisition from private entities. A RPF has been developed to guide preparation of site-specific RAPS/A-RAPs to address the land acquisition and involuntary resettlement and as well as physical and economic displacement related issues.
ESS-6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	A detailed guideline has been given in the ESMP preparation section of the ESMF. Besides, site-specific management plans with detailed ecological studies will be prepared for each sub-project/activity in line with WB ESF, including application of the mitigation hierarchy when potentially impacting Natural and / or Critical Habitats, and designing management measure to ensure NNL or NG, respectively.
ESS-7: Indigenous People	During preliminary screening of the project, no communities meeting the ESS7 criteria was identified. However, if any IPs are identified during the preparation of site-specific ESIA/ESMP, a Small Ethnic Community Development Plan (SECDP) will be prepared following the ESS7 requirements.
ESS-8: Cultural Heritage	No significant cultural heritages have been identified during the initial screening. However, further assessment will be carried out during the preparation of the site-specific ESIA/ESMPs and in case any such cultural heritage are found, appropriate mitigation measures will be included in the ESIA/ESMPs. This will also include a Chance Finds Procedure which will be appended to bidding and contract documents to illustrate actions to be taken on finding any cultural heritages. Efforts will also be made to identify cultural heritage in collaboration with communities during the stakeholder consultation process, and avoid siting facilities on or near culturally important areas.
ESS-9: Financial Intermediaries	Not relevant.
ESS-10: Stakeholder Engagement and Information Disclosure	Under this BBIN-MPA program, a SEP has been developed for all the PIUs that identifies the various stakeholders and ways to engage them and close the feedback loop. The SEP has detailed a GRM for the PIUs to address issues and concerns for the stakeholders.

3.6 Guidance Related to COVID-19

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 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.

ESF/Safeguards Interim Note: Covid-19 considerations in construction/civil works projects by WB is applicable to all activities of project during COVID-19 pandemic. 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.

4. ENVIRONMENTAL AND SOCIAL BASELINE

Except for the Sylhet-Charkhai and Sheola roads, which have already been explained, the client has yet to generate site-specific baseline information for rest of the sub-projects. However, during the ESMF preparation, preliminary assessment revealed that the project area in all three BLPA land ports and the NBR custom houses/training academy had no important natural habitats or threatened animals inside the project effect regions. Around the identified proposed sites or along the alignments, there are no archaeological sites, sensitive cultural or biodiversity receptors of international, national, state, or district importance, such as protected areas, key biodiversity areas, forest areas, sacred groves, or historical/cultural monuments. However, in the suggested places, some minor homestead trees may need to be removed. The estimated land acquisition for BLPA under Component 1 is 120 acres (25 acres for Burimari, but 20 acres are government land, so only 5 acres will need to be acquired) and will have significant involuntary resettlement impacts on both legal and informal land owners, businesses, tenants, homesteads, residential and commercial buildings, particularly in Bhomra. Under Component 2, no land acquisition is expected for NBR, and there are no unauthorized inhabitants. The ESMF for the three components includes a general summary of the project's environmental and social baseline. However, before executing the sub-projects, the ESMF recommends a more thorough assessment. Because the design and location of the sites are more advanced, the clients will prepare a more detailed E&S baseline as part of the ESIA for those sub-projects.

4.1 Baseline Environmental Status Description

4.1.1 Physical Environment

4.1.1.1 Climate and Meteorology

The temperature in the project area ranges from mid-30 to 25°C and in case of rainfall, wind speed the change is almost similar as May, June, July, August and September generally show the highest concentration.

4.1.1.2 Topography

For component 1, The general topography of the project area is flat. The topography of the specific project location is 30-75m a.m.s.l and 3-10m a.m.s.l. For component 2, the project area is mainly plain land with a general elevation of 3.6 m.



Figure 4.1: Topographical Status of the Project Area

4.1.1.3 Hydrology

For component 1, the Burimari land is located beside the Dharla river, whereas the Bhomra land port is located beside the Ichamati river and for the Benapole land port, there is no waterbody adjacent to the land port area. Tap water and water collected from tube wells are the main sources of drinking water.

For component 2, there are two ponds, within the boundary of the Chattogram Customs Office and the tap water provided by the Chattogram WASA is the main source of potable water in the project area.

But as the project intervention work will be carried out within the boundary wall, so no issue regarding water pollution or groundwater overextraction. Natural fish is available in the nearby River and Dighi.



Figure 4.2: Hydrological Status of the Project Areas

4.1.1.4 Wind Hazard/Cyclone & Seismicity

The project areas are not subject to wind hazard or cyclones and no recent record have been found which may indicate the project areas are subject to wind hazard.

For component 1, the project areas fall in zone I and II indicating low to moderate level intensity level towards seismic activities. Whereas, for component 2 and 3 the project areas fall in zone II indicating moderate level intensity.

At present, there is issue regarding drainage congestion especially in the land ports. The development work may improve these conditions.



Figure 4.3: Drainage Status of the Project Areas

4.1.1.4.1 Solid Waste Management

For component 1, there is no waste management plan is developed at present. For component 2, At present there is some wastes bins are placed to collect the wastes but no centralized waste management plan is developed yet. During Stakeholder consultation meeting on December 20, 2021 at Chattogram Customs House conference room, the participants raised the issue of future waste management system. They expressed their views on taking such measures so that the generated waste can be disposed of properly. Therefore, these important issues should be actively considered during the formulation of ESIA and ESMP so that measures can be taken to reduce wastes. The construction activities will generate solid wastes, construction debris and construction waste that will degrade the quality of the surrounding environment if not properly disposed-off in the designated dumping site. Customs House, Chattogram Laboratory is one of the important laboratories in the country, where 90% of the chemical tests are done which are imported to Bangladesh. But the condition of the laboratory is not good and the staff position is very inadequate. As a result, the laboratory management system is very weak. Since there are many hazardous substances in the laboratory, the matter should be taken seriously. In this case, special attention should be paid to the safe management of hazardous wastes during ESIA and ESMP preparation. The waste management issues have been addressed in the ESMP with their possible mitigation measures especially during the construction phase.

4.1.2 Biological Environment

The project areas are mostly abundant with homestead plantations and the construction work may need to cut some of these trees and most of the trees there are fruitless, so the chances of birds living or sitting on the trees are very low. However, there may have some small mammals like squirrels, small birds like butterflies, grasshoppers etc. and some insects in those places. These issues are addressed in the ESMP with their possible mitigation measures.





Figure 4.4: Floral Status of the Project Areas

4.1.3 Socio-Economic Environment

4.1.3.1 Demography

The survey team interviewed 50 households (HHs) across Burimari land port project area. Gender Ratio of male/female was close to 1.214. The 50 sample households have 237, consisting 130 male and 107 female. Household members with average household size of 3 meaning that the sample households in Burimari, had larger household size than national average 4.4 and that of 145 PAP households 4.29. Of the population of 50 sample households 21.5% are male above age 45, 21.4% are female above age 45%. The average age of each HH is approximately 28.86 years, with maximum age being 80 years for male and 70 for female. In case of Bhomra land port area, the 190 sample households have 893 household members with average household size of 4.70 meaning that it has larger household size than national average 4.4 and that of 145 PAP households 4.29. Out of 190 respondents 140 are men and 50 are women, 35.3% are adult male, 34.6% are adult female, 15.7% are boys and 14.4% are girls. Sex Ratio of male/female is very close to 1.0 for Benapole. Component 2 sub-project area is occupying 6.77 acres of land with a commercial/residential land use in 30% built-up coverage of the total available land.

4.1.3.2 Literacy

Literacy rate of sample respondents was 44.6 in Burimari union. Literacy rate of 190 sample respondents was 63.7% and this should be due to positive change after 2011. There is Private College, High School, Primary School, Kinder Garden School and Madrasha are within 2.00 km around the proposed land. No aesthetic structure is available in and around the project site. Settler from different region of the country made their resident around the project site and engaged in different ways of living.

4.1.3.3 Employment Status

Day-laboring is the single largest occupation of non-PAP sample households. One of the major professions is shop/hotel owners having highest percentage of 20%. Followed by agriculturists (18.95%) and labors (16.84%). The lowest percentage (1.05%) is of farmers, teachers and home businesses. Almost 35% people are involved in port related activities e.g.; export-import.

4.1.3.4 Religion

The study area district, Upazila, UP and village comprise mainly of two religious' groups- the Muslims and Hindus. While the district has overall 82:18 Muslim-Hindu population, the proportion of Muslim increases to 92:8 in the village level which is close to religious composition at the national level.

4.1.3.5 Vulnerable Groups

The vulnerable groups will be identified and addressed in the SEP. Issues regarding their relocation, job facilities will also be discussed in that plan. Special attention shall be paid to them to ensure their maximum self-development.

4.1.3.6 In Migration Issues

Several peoples are coming from both India to Bangladesh and Bangladesh to India. The locals are actively earning their livelihoods by working in jobs closed to the borders. For this, a number of Indian peoples are coming to Bangladesh and vice versa. These issues also create risk of transmitting sexual diseases and especially in the time of COVID-19 pandemic, the port areas especially are in vulnerable conditions. As the three selected land ports have their own medical team to monitor but it is not enough to render appropriate services.

5. POTENTIAL KEY ENVIRONMENTAL AND SOCIAL IMPACTS

5.1 Risk Assessment of the Project

The Project will finance infrastructure facilities at Benapole, Bhomra, and Burimari Land Ports and Chattogram, Beanpole Port and Dhaka Airport Customs Houses. It will also finance improvement of Sylhet-Charkhai-Sheola-Sutarkandi Highway. The infrastructure will be premised on digitalization, contact-free and paper-free processing. The Project will also support the development of an automated border management system coupled with support for procedural, regulatory and legislative reforms, and associated capacity building support to enable contemporary trade facilitation practices. The proposed buildings include customs houses, warehouses, transshipment sheds, truck sheds, export sheds, office and residential buildings, etc. Therefore, the anticipated environmental and pollution risks are typical for construction works: air, water and land impacts, and health and safety issues of workers and communities. In the operations phase, there will be normal waste management issues related to operation of offices and land port activities: general wastes, e-wastes and spoiled perishable goods discarded by importers/exporters, and typical occupational health and safety issues. Under this project, there is scope of enhancement measures such as using renewable energy in the new buildings, reusing wastewater, and composting biodegradable wastes.

Overall, the proposed activities are assessed to have Substantial environment risk given that most of the works are rehabilitation and improvement of existing infrastructure. Furthermore, there appears to be no environmentally sensitive areas that will be affected by the sub-project activities under NBR. During construction, roadside settlements will be exposed to noise, dust, air pollution, landslide risk and traffic-related safety risks. Considering the ecological sensitivity, environmental footprints, drainage congestion, traffic and biodiversity loss along the ROW, the proposed expansion of the existing Sylhet-Charkhai-Sheola-Sutarkandi Highway is assessed to have High environment risk provided that a detailed site-specific ESA/ESMP will be carried out by the PIU of RHD who is already familiar with WB's ESF from the past projects. BLPA has demonstrated under the project that it has the ability to manage environmental risks and impacts satisfactorily. With trainings and capacity building and specialist support, it is expected that the anticipated environmental risks can be managed.

Under NBR, the proposed rehabilitation and improvement of existing infrastructure will occur within the building footprint inside the project area with no land acquisition requirements and physical and economic displacement of the local community. Therefore, the social risks for NBR are assessed to be Substantial. Under BLPA, works will require an estimated 120 acres for three land ports in peri-urban and urban settings and could displace commercial and residential properties. BLPA, the key implementing agency, has had considerable experience of land acquisition. However, considering the scale of land acquisition and displacement of commercial and residential properties, social risk rating for the BLPA activities is assessed to be high.

A preliminary assessment of SEA/SH risks using the Bank's SEA/SH risk assessment tool for projects with major civil works suggests a 'Moderate' SEA/SH rating for NBR sub-project components. This is due to the project sites being in peri-urban and urban areas which are not hard to supervise. However, risks from labor influx in multiple project areas along the regional corridors exists. The major construction works of the proposed land ports will inevitably lead to greater mobility of peoples, which could contribute to raising a number of social problems; namely, greater exposure to communicable and sexually transmitted diseases including HIV/AIDS due to influx of outsiders such as traders, businesspersons, skilled and unskilled migrant laborers, transport workers, etc. all of which may also potentially lead to social tensions among the local communities. Human and sex trafficking targeting girls and women is common in South Asia and the potential labor influx may also create SEA/SH risks at the project sites. However, most of the ES risk assessment at present focuses on civil works activities of the project components. As more information becomes available during the project on the skills development components under MoC of the project, risks will be re-assessed based on appropriate metrics.

As stated earlier, this chapter will not assess the impacts of the project intervention activities of RHD sub project.

Environmental and Social Risk Classification (ESRC) of the BBIN-MPA Program has been rated as ‘High’ Environmental and Social Assessment (ESA) study i.e., ESIA should further assess the exact depth of risks and impacts, based on the evidence, professional judgment and public consultations. A preliminary categorization of the project components/sub-components based on their ESA requirement is given in 5.2 following the WB ESF/10 ESSs.

The projected impacts of the BBIN-MPA Program on the key ES parameters that have been identified as part of the ESMF are listed in 5.1, which has also been analyzed in according to the ESS1 risk categories based on the significance of each impact. In the subsequent sections, these impacts are discussed and guidelines for mitigation included for the ESMF of the BBIN-MPA Program. The potential ES impacts and mitigating measures is given in 5.3.

5.2 Relevant E&S Risks and Impacts

Relevant E&S risks and impacts associated to operations are reflected in Table 2. E&S impacts and risks that are particularly relevant and important are highlighted with corresponding measures to be detailed in the sub-projects ESAs/ESMPs. These are related to:

- Management of refrigeration units, hazamat cargo (e.g., fuel, chemical) and potential accidental spills.
- Dealing with labor unions in the Port Facilities;
- Community Risks related to increase containers and heavy commercial import-export traffic; and
- Security Risks associated with border activities (e.g., human and illegal drugs trafficking, contraband, etc.)
- Occupational and community health risks including SEA/SH
- Life and Fire Safety associated with offices, container storage, training facilities, and dormitories;

Under this program, there is scope of enhancement of measures in subprojects such as use of renewable energy in the new buildings, reuse of wastewater and composting of biodegradable wastes.

5.3 Anticipated Potential Environmental and Social Impacts

It is important to identify the potential impacts related with project location, design, construction, and operation phases of the project on the physical, biological and socioeconomic domains. An impact is defined as any change to an existing condition of the environment. Identification of potential impacts is based on data analyses and stakeholder discussions. Environmental and social impacts can be broadly classified as those taking place during pre-construction, construction and operational phases of the project. Activities involved affecting environmental components at different phases of the project implementation as well as potential environmental impacts are discussed in the following sections and also in below table 5.2 mention the ESSs which may relevant in the subprojects (BLPA, NBR, RHD & MoC).

5.3.1 Pre-Construction Phase/Project Siting

5.1.1.1 Site Specific Land Cover and Land Use Changes

Reconstruction of the NBR building (will include, inter alia, office, residential, dormitory, Training center and laboratories buildings) projects may change existing land use and land cover at the local level, although potential negative impacts would be limited within the construction site and reversible.

Expansion of the 3 land ports may change the existing land use pattern but would be limited within the construction yard.

5.1.1.2 Loss of Trees

Siting of proposed infrastructure for the reconstruction of ports and buildings of the project may require cutting of trees and removal of natural vegetation, if realignment are necessary. Tree felling will affect timber and bio-mass production potential directly at local level. Ecological impacts can be reversed planting site specific tree species as per the directives of Social Forestry Act (2004).

5.1.1.3 Loss of Habitat

Any loss of trees will impact on other flora and may affect wildlife, particularly birds and mammals that rely on trees their food source. In addition, the loss of tree may increase soil erosion from rain cut. Apart from trees and undergrowth other vegetation affected will be agricultural crops, bamboo bush and other native vegetation. Excavation of borrow pits will add to the destruction of flora.

5.1.1.4 Drainage congestion and water logging

Proposed infrastructure for the subproject's activities under all IAs may cause drainage congestion and water logging at the local area, if not properly considered the local drainage of runoff.

5.1.1.5 Impacts on Vulnerable and disadvantage groups/communities/individuals

The sub-projects intend to ensure effective and efficient transit of goods, creating jobs and improving the safety of communities enabling access to livelihoods and economic activities using improved communication and connectivity towards national highway and land port, etc. Project's inclusive approach will result in benefits to households and individuals, especially the most disadvantaged like female-headed households, widows, the poorest, and the elderly peoples in the rural communities.

5.1.2 Construction Phase

5.1.2.1 Air Pollution

For component 1, Air quality may be affected for short duration in and around the construction site due to various construction activities and construction vehicular movement. The pollutants of primary concern include SO_x and Suspended Particular Matter (SPM). The construction equipment/vehicles, using fuel and diesel and movement of vehicles will also contribute to air pollution releasing hazardous air emissions such as NO_x, SO₂, etc. This will impact the air quality affecting the immediate vicinity (especially governmental institutions) of the working area. For component 2, the construction vehicles may contribute to air pollution

5.1.2.2 Noise and Vibration Pollution

For all the components, a significant increase in noise is expected during construction. Noise levels in and around the construction sites could further increase as a result of operating construction vehicles/equipment and during unloading and loading of construction materials. A number of vehicles and equipment will be required for the construction of the proposed infrastructures and will depend upon the construction methodology for various types of works. However, the equipment will broadly consist of mixture machine, concrete vibrator, brick/boulder breaking machine, crane etc. and construction vehicles will consist of dump trucks, transport vehicles, etc. which will cause noise pollution. Especially as the land ports are already being noisy, the construction activities may add to it and this may result in health hazard of the labourers specifically if proper measures would not be taken.

5.1.2.3 Water Pollution

5.1.2.3.1 Surface Water

During the construction 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 accidental leakage or spillage of fuels, oils, and other chemicals may also generate considerable quantities of waste effluents. These effluents can potentially contaminate the water sources of the area and can also be harmful for the natural vegetation, cultivation fields, water bodies, and aquatic flora and fauna.

5.1.2.3.2 Groundwater

Increased demand of groundwater is anticipated during the construction phase for construction activities and domestic purposes. Since groundwater is likely to be contaminated with arsenic at large places, consumption of arsenic contaminated groundwater may have adverse health effect on workers. Uncontrolled extraction of water may also affect availability of waters to locals. In addition to that, construction waste, if left unattended will result in forming leachate which will percolate through the soil strata and will reach underground water table and hence, will end up contaminating it. Construction of building and bridges may cause impact to groundwater level and quality. The piles driven into the ground with multi layers to the depth of about 40 ~ 50 m (bottom of the quaternary deposits), would penetrate the aquiclude/aquitard and then cause the risk to pollute the water quality of the aquifer.

5.1.2.4 Impacts of Land Filling (at construction site)

Potential impacts that can arise from the proposed construction of NBR/BLPA facilities, if not very carefully planned and monitored the collection of land filling materials. Land filling activity must avoid collection of topsoil from crop fields, hills cuttings and illegal sand mining from river beds.

5.1.2.5 Soil Contamination

Much like water pollution discussed above, soils in the construction or expansion area and nearby lands may be prone to pollution from the construction activities, construction yards, workers camps and other construction areas. Fuel and hazardous 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 and hazardous materials, and potential spills from these will severely impact the soil and water quality and also cause safety and health hazards.

5.1.2.6 Drainage congestion and water logging

Run off from storage of construction material near water bodies, or uncontrolled disposal may cause temporary drainage congestion, especially near the locations of small bridges, culverts, service areas, and construction sites. Hence, no significant impact is anticipated on these water bodies during this phase. The project area is not prone to flood. As per assessment and considering the existing road levels some parts of the road stretch is likely to be affected by flood respectively.

5.1.2.7 Generation of Solid Waste and Hazardous Waste

Solid waste generated during the construction phase will include excess construction materials such as sand and soil, faulty/damaged parts, metal scraps, cardboard boxes, containers, and cotton swaths from workshops, and domestic solid waste from construction offices and camps. In addition to the above, small quantities of hazardous 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). The above-mentioned waste need to be properly managed to 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.

5.1.2.8 Occupational Health and Safety

Generally, the construction activities will involve small to medium scale excavation, operations of construction machinery and vehicular traffic. These activities may pose health and safety hazards to the workers at site during use of hazardous substances, lifting and handling of heavy equipment, operating

machinery and electrical equipment, working near water or at height and more. The program will need fuels, oils, and asphalt during the construction phase. Inappropriate handling or accidental spillage/leakage of these substances can potentially lead to safety and health hazards for the construction workers as well as the local community. Similarly, various construction/renovation of facilities and setting up equipment activities in laboratory/workshops/training lab 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 hazardous materials to death i.e., movement of the heavy machineries and equipment.

5.1.2.9 Impact on labor, working Conditions and labor risks, including risks of child labor and forced labor, human trafficking

The proposed sub-projects will entail employment of a significant number of labors especially during construction. The majority of labor will be locally hired, with the exception of skilled workers who may not be found in the program areas. However, potential risks engaged both 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. A separate LMP will be prepared for each component which will guide to manage the risk associated with labor related issues.

5.1.2.10 Involuntary Resettlement Impacts

The proposed activities are expected to require land acquisition with physical and economic displacement which may impact rural, low-income, and indigenous communities. The project will try to avoid take any private land through involuntary acquisition and avoid any physical displacement of residents for activities under the project. Most of the works will be carried out within the existing available lands. However, acquisition of private lands would be required in some areas, likelihood that infrastructures construction may involve displacement of formal and informal private users. For all these reasons, and largely as a precautionary measure, the project triggers ESS5 on involuntary resettlement. For the IAs, separate RPF will be prepared. Site-specific RAPs will be developed - if and as necessary - during the project implementation. The RPF and any RAP will ensure the proper calculation and recording of the involuntary displacement impacts as well as identification of the affected people and mitigation of their loss and impacts. The purpose of the RPF and implementation of the RAPs is to ensure that there is no adverse effect on the living conditions and livelihoods of the affected people because of the project.

5.1.2.11 Impact on Cultural Heritage

There are some mosques, temples and graves along the proposed sub-projects areas, which may be affected by project works. If they are found by the ESIA to be affected, they will have to be relocated and will be included in the RAP prepared for the program. Chance Find Procedures will be included in the ESMP and chance find clause will be included in works contracts requiring contractors to stop construction, if cultural heritage is encountered during construction. NBR/BLPA/MoC will also have to notify and closely coordinate with the relevant mandated country authority for the salvaging and restoration of such cultural heritage.

5.1.2.12 Impact of Labor Union

Especially for component 1, as the construction works progress, the labor union leaders may create problems which will affect the progress and slow down the construction activities eventually will be resulted in economic loss. Prior to the start of the work thus an agreement needs to be maintained between the respective IAs and leaders of labor union.

5.1.2.13 Security Management Issues

As the sub project areas are very sensitive especially the land ports, it is very important to maintain the security properly. Otherwise, accident may occur which may affect the peoples as well as the resources may also be affected. Continuous security setups are required at the construction sites to avoid any unwanted incidents.

5.1.3 Post Construction/Operation Phase

5.1.3.1 Loss of Vegetation and Wildlife Biodiversity

Construction of buildings or 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 negative impact on homestead wildlife biodiversity. In such cases of potential impact on homestead plants and wildlife, demands detail baseline survey and implement appropriate homestead habitat management activities by the authority.

5.1.3.2 Generation of Solid Waste and Hazardous Waste

Solid waste will be generated from landing sites, during regular operation and maintenance activities of the constructed road. Hazardous waste will also be generated from access road maintenance. This waste if not appropriately disposed has a potential to contaminate soil and water resources, thus negatively affecting communities as well as natural habitat. Improper management of solid wastes may lead to soil and ground water contamination through the generation of leachate. Bad odor due to non-removal of waste regularly will also cause unhealthy conditions in the surrounding area including attracting nuisance animals such as flies and mosquitoes. Wastes will also cause human health diseases. Overall, negative impacts are predicted due to wastes during the operation stage if handling and disposal of solid wastes will not be carried out in accordance with a proper waste management plan (WMP).

5.1.3.3 Noise Generation

During operation, noise levels will be increased due to the higher traffic volume and mass people gathering especially for port areas. Traffic noise will be a significant nuisance to the sensitive receptors such as schools and religious places located very close to the roads, housing facilities and also to the children and aged persons.

5.1.3.4 Water Pollution and Drainage

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.

5.1.3.5 Impacts on local livelihoods

While effort will be exerted for livelihood improvement of the farmers and local dependent 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 try to avoid acquisition of land and involuntary displacement of people. However, temporary economic displacement of some vendors and businesses along the roads and in market areas where the proposed road and port facilities will be constructed, expanded and/or rehabilitated. If so, impacted persons will be compensated following the criteria as outlined in the RPF/RAP. The major aim is to improve livelihoods of the poor rural community as well to expand the export-import facilities with the capacity to better manage local resources and expand their participation in more exclusive and sustainable development. The beneficiaries and their location will be selected by the IAs and the program will be designed and implemented by PIU.

5.1.3.6 Increased risk of road accidents

One of the key potential risks associated with the sub-projects is increased risk of road accidents due to higher traffic. However, substantial road safety measures and facilities will be installed under the BLPA/NBR/MoC sub-project components to minimize the accidents.

5.1.3.7 Impact of Labor Union

The union may arise issues which will affect the operation of the ports especially. To minimize these issues, regular monitoring along with monthly meeting session may help to ease the condition.

5.1.3.8 Sexual Exploitation and Abuse, and Sexual Harassment (SEA/ SH)

A preliminary assessment of SEA/SH risks using the Bank's SEA/SH risk assessment tool for projects with major civil works suggests a 'Moderate' SEA/SH rating for BLPA, NBR sub-project components. This is due to the project sites being in peri-urban and urban areas which are not hard to supervise. Most of the unskilled and semi-skilled labor are expected to be locally sourced with only high skilled and some semi-skilled labor sourced from outside sub-projects' areas of influence.

However, the construction works of the proposed land ports will inevitably lead to greater mobility of peoples, which could contribute to raising a number of social problems; namely, greater exposure to communicable and sexually transmitted diseases including HIV/AIDS due to influx of outsiders such as traders, businesspersons, skilled and unskilled migrant laborers, transport workers, etc. all of which may also potentially lead to social tensions among the local communities.

Human and sex trafficking targeting girls and women is common in South Asia where immigration points at the land ports could potentially serve as conduits for cross-border trafficking. A Gender and SEA/SH Action Plan is prepared for the project that details the relevant mitigation measures both preventive and curative, and as well includes specific actions to promote gender and women empowerment.

5.1.3.9 Security Management Issues

Specially, the land ports are very crucial points as everyday a number of people cross these points and without proper security managements there might be incidents affecting the national security issues apart from local accidents.

Table 5.1: Summary of Potential Environmental and Social Impacts and their Significance (ESS Risk)

Potential Impacts	Duration of Impact	Spatial Extent	Reversible or not	Likelihood	Magnitude	Sensitivity	Significance Prior to Mitigation	Significance after Mitigation
Impacts related to Project Siting								
Land cover and land use changes	Long term	Local	No	Certain	Moderate	Moderate	Moderate	Low
Loss of trees	Long term	Local	Yes	Certain	Moderate	Moderate	Moderate	Low
Loss of habitat	Long term	Local	No	Likely	Moderate	Substantial	Moderate	Low
Drainage congestion and water logging	Long term	Local but beyond project footprint	Yes	Likely	High	Moderate	Moderate	Low
Impacts during Project Implementation Phase								
Air pollution	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate	Low
Noise	Short term	Local	Yes	Likely	Moderate	Moderate	Moderate	Low
Water pollution	Long term	Local but beyond project footprint	No	Certain	Moderate	Moderate	Moderate	Low to moderate
Land Filling	Long term	Local but beyond project footprint	No	Certain	Moderate	Moderate	Moderate	Low to moderate
Soil contamination	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate	Moderate
Solid wastes and hazardous wastes	Short term	Local	Yes	Certain	Moderate		Moderate	Low
Impacts on homestead biodiversity	Long term	Local but beyond project footprint	No	Certain	Moderate	Moderate	Moderate	Low
Site clearance and restoration	Short term	Local	Yes	Certain	Moderate		Moderate	Low
Occupational health and safety	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate	Low to moderate
Labor Impacts and risks of child labor, forced labor, human trafficking	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate	Low to moderate
SEA/SH	Long Term	Local	Yes	Certain	Moderate	Moderate	Moderate	Moderate
Involuntary Resettlement	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate	Moderate
Impact on Cultural Heritage	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate	Low to moderate
Impact of Labor Union	Long term	Local	Yes	Likely	Moderate	Moderate	Moderate	Low to moderate
Security Issues	Long term	Local	Yes	Likely	Moderate	Moderate	Moderate	Moderate
Impacts during Post Project Operational Period								
Loss of Homestead Vegetation and Wildlife Biodiversity	Long term	Local	No	Certain	Moderate	Moderate	Moderate	Low

Potential Impacts	Duration of Impact	Spatial Extent	Reversible or not	Likelihood	Magnitude	Sensitivity	Significance Prior to Mitigation	Significance after Mitigation
Generation of Solid Waste and Hazardous Waste	Long term	Local	Yes	Certain	Moderate	Moderate	Moderate	Low
Noise generation	Long term	Local	Yes	Likely	Negligible	Mild	Moderate	Low
Water pollution and drainage	Long term	Local	No	Certain	Moderate	Moderate	Moderate	Low to moderate
Changes in land use pattern	Long term	Local	No	Certain	Moderate	Moderate	Moderate	Low
Impacts on local livelihoods	Long term	Local	No	Certain	Moderate	Moderate	Moderate	Low
Increased risk of road accidents	Long term	Local	No	Likely	Negligible	Moderate	Low	Low
Impact of Labor Union	Long term	Local	Yes	Likely	Moderate	Moderate	Moderate	Moderate
Security Issues	Long term	Local	Yes	Likely	Moderate	Moderate	Moderate	Moderate

Table 5.2: Categorization of BBIN-MPA Program Activities (Phase 1 Bangladesh) Based on Key Predicted Impacts and ESS Requirements

Component	Sub-Component	Activities/ Investments	Potential Impacts	Risk Category	ESSs Requirement
Component 1: Land Port Development and Border Management Improvement (BLPA)	1.1 Upgrading of Benapole, Burimari, and Bhomra land ports	Office buildings, residential buildings, land filling, boundary wall, water supply system, watch towers, Electric system, warehouses, stock yard, transshipment sheds, pavement, internal road network, RCC draining network, solid waste management and automation premised on digitalization, contact-free and paper-free processing	Component 1.1 will have potential ES impacts because of construction activities, impacts include, among others, noise, vibration and air pollution; water pollution & drainage congestion; Land filling and soil contamination; Solid waste generation; traffic / mobility / access; impacts to physical cultural resources; Impact on disposing accidental chemical waste from sheds/warehouses; Labor related risk (Occupational and Community health and safety; issues related to the COVID-19 pandemic); The civil works may need private land acquisition and may cause resettlement, relocation and other issues associated with land acquisition.	Substantial	E&S Screening, ESIA, ESMP, LMP, SEP, OHP, EHS (GIIP); GRM, SEA/SH, RPF/RAP, C-ESMP, COVID-19 safety protocol and Integration of E&S requirements in the ToRs,
	1.2 Development of Automated Border Management System	This sub-component will support the development of a new multi-agency Automated Border Management System platform aimed at increasing visibility of the trade chain, reduce costs and unnecessary interactions with cargo shipments.	No physical activities under component 1.2. This component will cover modernizing both regulatory and non-regulatory processes, automating them and subsequently share valuable data amongst border management partners.	Low	E&S Screening, Integration of E&S requirements in the ToRs, SEP, GRM, COVID-19 safety protocol
	1.3 Technical Assistance to enable contemporary trade facilitation practices	This sub-component will finance long-term master plans, feasibility design studies and environmental and social safeguard studies for priority land ports that will be considered for financing in subsequent MPA phases (e.g., Banglabandha, Hili, Sonahat, Bilonia, Tamabil, Bholaganj, Darshana and other land ports). Support will also be provided to build capacity of BLPA staff in modern border management practices.	Component 1.3 will have no physical activities, thus have no potential ES impacts, rather will contribute to the capacity building of the IAs staff in managing ES compliances during project implementation and operation.	Low	E&S Screening, Integration of E&S requirements in the ToRs, SEP, GRM, COVID-19 safety protocol

Component	Sub-Component	Activities/ Investments	Potential Impacts	Risk Category	ESSs Requirement
Component 2: Customs Modernization (NBR)	2.1. Upgrading of Custom Infrastructure	Upgrading of physical facilities at the Chattogram Customs House In addition, Dhaka and Benapole customs houses will also be modernized. These physical setups will include different types of residential and office buildings, laboratory, warehouse, data centre, etc.	Component 2.1 will have potential ES impacts because of construction activities, impacts include, among others, Noise, vibration and Air pollution; water pollution, Land filling and soil contamination; Solid waste generation; Labor associated risk (Community health and safety; community health and safety and issues related to the COVID-19 pandemic); Operation of laboratory may generate laboratory wastes; The civil works may need private land acquisition and may cause resettlement, relocation and other issues associated with land acquisition. Labor related risk Occupational and Community health and safety; and issues related to the COVID-19 pandemic;	Substantial	E&S Screening, ESIA, ESMP, LMP, SEP, OHP, EHS (GIIP); GRM, SEA/SH, RPF/RAP, C-ESMP, COVID-19 safety protocol and Integration of E&S requirements in the ToRs.
	2.2. Development of Customs and Value Added Tax (VAT) Training Academy	development of a state-of-the-art Training Academy to help institutionalize NBR's capacity building programs and allow development of e-Training modules and planned courses for continuous Human Resource Development. This TA will include admin building, conference room, labs, gallery, library, multipurpose hall, cafeteria, prayer house, rest ouse, dormitory, residential buildings, relocation of school, pump house, water tank, mosque, pond, playground, water treatment plant, Rainwater harvesting system, Sewerage treatment plant, solar power, draining network, internal roads, etc.	Component 2.2 will have potential ES impacts because of construction activities, impacts include, among others, Noise, vibration and Air pollution; water pollution, Land filling and soil contamination; Solid waste generation; Labor associated risk (Community health and safety; community health and safety and issues related to the COVID-19 pandemic); The civil works may need private land acquisition and may cause resettlement, relocation and other issues associated with land acquisition. Labor related risk Occupational and Community health and safety; and issues related to the COVID-19 pandemic;	Substantial	E&S Screening, ESIA, ESMP, LMP, SEP, OHP, EHS (GIIP); GRM, SEA/SH, RPF/RAP, C-ESMP, COVID-19 safety protocol and Integration of E&S requirements in the ToRs.
	2.3. Technical assistance for tariff modernization	Develop and implement phased implementation plan for tariff rationalization, seeking to reduce overall level of tariffs and dispersion as per the vision set out by the GoB in its 8th FYP and proposed Bangladesh National Tariff Policy (to	No environmental or social impacts are envisaged. Rather this sub-component will have positive impact on NBR's capacity building and job creation.	Low	E&S Screening SEP, GRM, COVID-19 safety protocol.

Component	Sub-Component	Activities/ Investments	Potential Impacts	Risk Category	ESSs Requirement
		<p>be prepared by Ministry of Commerce).</p> <p>The phased implementation plan will take into consideration export diversification, sector competitiveness, job creation, investment, Least Development Country (LDC) graduation and economic recovery from COVID 19. Crafting such tariff rationalization plan requires significant capacity improvement in simulation, revenue modeling and other statistical analysis which will be supported through this sub-component.</p>			
	2.4. Technical assistance for Risk Management Commissionerate, Feasibility and detailed design for proposed National Risk Targeting Center and TA for proposed Bangladesh Single Window Commissionerate	<p>This sub-component will build on the reform momentum in Risk Management supported through BBIN, Jobs DPC Series of the Bank and IFC advisory project TraCED (602137). The activities will cover the following: (a) Capacity Building: A competency based human resource strategy and succession plan will be required to ensure that the CRMC is appropriately staffed to carry out a full range of duties. This will include development of e-learning modules as well as Training of Trainers (ToT) for continuous capacity development program. There will be provisions for learning from benchmark countries as well; (b) detailed Standard Operating Procedures (SOP) for the CRMC including the work functions and coordination with local risk management units to support operationalization; (c) feasibility and</p>	<p>No environmental or social impacts are envisaged. Rather this sub-component will have positive impact on NBR's capacity building and job creation.</p>	Low	E&S Screening SEP, GRM, COVID-19 safety protocol.

Component	Sub-Component	Activities/ Investments	Potential Impacts	Risk Category	ESSs Requirement
		detailed design of proposed National Risk Targeting Center with SOP for coordinated border management; and (d) for NSW Commissionerate, TA will be provided for stakeholder consultation, visioning, development of organogram, job description, roles and functions of officials as well as SOP for such collaborative border management platform to sustain Bangladesh Single Window.			
	2.5. Technical assistance for Bonded Warehouse modernization	This sub-component will be to support NBR in streamlining Bonded Warehouse Policy and regulations for bond license, renewal, management, audit and reconciliation removing the disparities between Ready Made Garments and non-RMG sectors It may also support change management for Customs Bond Management System (CBMS), proposed automation of Duty Drawback and Exemption Office and addressing reconciliation challenges.	No environmental or social impacts are envisaged. Rather this sub-component will have positive impact on NBR's capacity building and job creation.	Low	E&S Screening SEP, GRM, COVID-19 safety protocol.
Component 3: Trade Facilitation Agreement (TFA) Implementation (MoC)	3.1. Strengthening of the National Trade Facilitation Committee (NTFC) and development/ implementation of National Trade and Transport Facilitation Action Plan	This sub-component will support establishing the NTFC Secretariat and the development and implementation of National Trade and Transport Facilitation Action Plan. The NTFC will serve as the primary trade and transport coordination mechanism in Bangladesh and will serve the functions as envisioned in the World Trade Organization (WTO) Trade Facilitation Agreement (TFA). The formation of the NTFC Secretariat will be critical for supervising and	No environmental or social impacts are envisaged. Rather this sub-component will have positive impact on MoC-WTO cell's capacity building in implementation of the TFA.	Low	E&S Screening SEP, GRM, COVID-19 safety protocol.

Component	Sub- Component	Activities/ Investments	Potential Impacts	Risk Category	ESSs Requirement
		monitoring the TFA implementation of the trade related agencies.			
	3.2. Development of Decision Support System for policy analysis, trade statistics and trade negotiations	This sub-component will support a Decision Support System that will provide policy analysis, market research and trade statistics to support the MoC's mandate in implementing trade policy including negotiating various trade agreements. This incorporates the establishment of an institutional architecture, ICT connectivity and associated skills and capacity building needs.	No physical activities under component 3.2. This component will positively contribute to capacity building and systemic management of of MoC-WTO cell.	Low	E&S Screening, SEP, GRM, COVID-19 safety protocol
	3.3. Formulation and implementation of National Tariff Policy	This sub-component will support the formulation a National Tariff Policy. Necessary capacity building of officials will also be carried out for subsequent policy updating and amendments to the policy.	No environmental or social impacts are envisaged. This component will positively contribute to capacity building and systemic management of of MoC-WTO cell.	Low	E&S Screening, SEP, GRM, COVID-19 safety protocol
	3.4. Upgrading of the Bangladesh Trade Portal (BTP)	This sub-component will support the enhancement of the Bangladesh Trade Portal, which is a key element for the successful functioning of National Trade Single Window.	No environmental or social impacts are envisaged.	Low	E&S Screening, SEP, GRM, COVID-19 safety protocol
	3.5. Training programs on trade facilitation for women traders and entrepreneurs	This sub-component will seek to empower women traders and entrepreneurs and support their integration into national, regional and global markets through capacity building in capacity building in trade related regulatory issues. This activity will reflect emerging from pilot programs undertaken under BBIN.	No environmental or social impacts are envisaged, rather this will contribute positively in empowering women traders and entrepreneurs and their capacity building in trade related issue.	Low	E&S Screening, IEE, SEP, GRM, SEA/SH, COVID-19 safety protocol

5.4 Mitigation Measures to Address Environmental and Social Impacts

The ESMF identifies the generic E&S risk and impacts for the project and provides the relevant mitigation measures. More specific E&S impacts and risks associated with subprojects will be identified during the preparation of ESIA/ESMP. The identified E&S risks and impacts are categorized as pre-construction, construction, commissioning and operational phases along with suggested mitigation measures which will be further assessed and detailed in the site-specific ESIA/ESMP.

Good International Industry Practice (GIIP) will be applied to mitigate all identified E&S impacts and risks associated with each sub-project activity and phase, and will be described in their C-ESMP and O-ESMPs. A set of standard mitigation measures against the typical E&S impacts and risks expected on this program's subprojects at their different phases are proposed in the Table 5.3 below.

Table 5.3: Potential Environmental and Social Impacts and Mitigating Measures at Different Phases of the BBIN-MPA Program

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
Preconstruction Phase				
Land Acquisition/ Requisition (if required)	<ul style="list-style-type: none"> ● Encroachment of agricultural land, cultural sites, fish habitat etc. ● Loss of agricultural production, fish resources; ● Loss of income and livelihoods; ● Social conflict. 	<ul style="list-style-type: none"> - Avoid agricultural land, social/religious establishments, fish habitat during finalization of the alignment of the approach road and location of the bridge; - Prior to start construction adequate compensation should be given to the PAPs in-time according to RAP. - Adequate compensation should be given for standing crops; - Avoid agricultural land, if possible; - Create job opportunities for the PAPs. 	PIU E&S consultant, RAP Implementation NGO	PIU/ <u>BBIN</u> -MPA
Road, Office, Training Center, Housing	<ul style="list-style-type: none"> ● Loss of housing and commercial structures; ● Dust pollution; ● Loss of income and livelihoods. 	<ul style="list-style-type: none"> - Avoid the housing and commercial structure during the finalization of the alignment and location of the road/bridge; - Proper compensation shall be provided to the affected peoples prior to the construction activities. - Create job opportunities for the PAPs. - Water spraying on the bear surface or dust pollution source; 	Contractors	PIU/ <u>BBIN</u> -MPA
Loss of vegetation/ tree	<ul style="list-style-type: none"> ● Accident risk during removal of trees/vegetation's in the project sites; ● Birds and others species can migrate from the trees/vegetation's; ● Impacts on the local climatic condition. 	<ul style="list-style-type: none"> - Prior to start construction, all vegetation should be removed from the proposed construction sites with the consultation of the local relevant authorities; - Avoid disturbance and be careful during construction about vehicle and equipment movement; - Proper H&S measures (use of appropriate PPE such as hand gloves, safety shoes and helmet) for the workers should be taken during removal of trees, bushes & crops; - To mitigate the ecological impact, tree plantation plan can be considered in the design & accordingly tree plantation will be done in an appropriate location to be determined by the PIU/<u>BBIN</u>-RTTF1 after consultation with the concerned authority; - The engineer shall approve such felling; only when the proponent secures receive a "clearance" for such felling from the PIU/<u>BBIN</u>-RTTF 1 as applicable; - Tree felling, if unavoidable, shall be done only after compensatory plantation of at least two saplings for every tree cut is done; - During the tree removal from the bridges and approaches construction sites diameter at best height (DBH) of the trees is 6 inches, only such trees should be considered by the contractor for compensation and plantation; 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
		<ul style="list-style-type: none"> - Tree plantation at the suitable locations after completion of the construction activities at the 1:5 ratio. 		
Removal of Utilities	<ul style="list-style-type: none"> ● Risks for workers health and safety; ● During movement of heavy Construction machineries equipment's can damage the utility services if not previously removed; ● Due to carelessness or incautiousness death from sudden electric shocks may occur. 	<ul style="list-style-type: none"> - Prior to start construction, the utility services (electrical cables, telephone line, water supply pipeline, gas supply pipeline and internet line) should be shifted with the consultation of the relevant organizations; - Inform the local community before starting removal or demolishing work; - Carefully remove the utilities that are connected to any structures; - Proper Health and safety measures for the workers should be taken during shifting of these lines to avoid any incidents. 	Contractors	PIU/ <u>BBIN</u> -MPA
Archaeological/ Historical/ Social/ Cultural/ Religious Sites	<ul style="list-style-type: none"> ● Encroachment of Archaeological/ Historical/ Social/ Cultural/ Religious sites ● Air and dust pollution; ● Noise level may create discomfort for the local community; ● Vibration can effect on social/ cultural/ religious site. 	<ul style="list-style-type: none"> - Avoid Archaeological/Historical/Social/Cultural/ Religious sites during the site selection and improvement works; - Spraying water on the dry surface to reduce dust pollution; - Follow strictly the chance finds procedures - Vehicles transporting construction material to be covered; - Create noise barrier around the construction sites; - Limit the speed of vehicles; - Stop the demolition work for short time like prayer time. - Realignment of bridge approach road (in case of bridge) if required. 	Contractors	PIU/ <u>BBIN</u> -MPA
Setting up labor camps	<ul style="list-style-type: none"> ● Land encroachment; ● Solid and liquid waste from the labor camp ● Potential community health including SEA/SH risks 	<ul style="list-style-type: none"> - Include E&S/ESMP provisions on labor, GRM, SEA/SH etc. in the bidding documents and C-ESMP/O-ESMP with payment milestones - Labor camp should be constructed at a distance from the water bodies; - Avoid productive land and away from the settlement during the selection of land for the setup of labor camp; - No solid and liquid waste discharge into the water bodies; - Instruct workers to maintain clean environment in the camps. - Enforce a Code of Conduct for all workers - Raise awareness among the communities on STDs, SEA/SH and the project GRM 	Contractors	PIU/ <u>BBIN</u> -MPA
Construction Phase				
Air Pollution	<ul style="list-style-type: none"> ● Construction vehicular traffic: Air quality can be affected by vehicle exhaust emissions and combustion of fuels 	<ul style="list-style-type: none"> - Fit vehicles with appropriate exhaust systems and emission control devices; - Maintain vehicles and construction equipment in good working condition including regular servicing; 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	<ul style="list-style-type: none"> ● Construction equipment: Air quality can be adversely affected by emissions from construction machineries and combustion of fuels; ● Construction activities: Dust generation from earth excavation, earth & sand stockpiles during dry period. 	<ul style="list-style-type: none"> - Operate the vehicles in a fuel-efficient manner; - Impose speed limits at 30 km/hour on vehicle movement at the worksite to reduce dust emissions; - Control the movement of construction traffic in the access road; - Focus special attention on containing the emissions from generators; - Construction equipment causing excess pollution (e.g. visible smoke) will be banned from construction sites immediately prior to usage; - Water spray to the dry earth/material stockpiles, access roads and bare soils as and when required 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: excavated earth, dredged soil, gravel and sand shall be covered and confined to avoid their wind drifted; - Restore disturbed areas as soon as possible by vegetation; - Establish adequate locations for storage, mixing and loading of construction materials, in a way that dust dispersion is prevented because of such operations; - The Air quality monitoring should be carried out by the contractor following the National Air Quality Standard (Schedule-2: Standards for Air Quality, ECR, 1997 and Amendment in 2005). 		
Noise Pollution	<ul style="list-style-type: none"> ● Construction vehicular traffic: Vibration and Noise quality will be deteriorated due to vehicular traffic. ● Construction equipment: Noise and vibration will have an impact on adjacent surrounding residents. ● Construction activity: Noise will have an impact on adjacent residents. 	<ul style="list-style-type: none"> - Strict measures for noise pollution control need to be undertaken during construction activities; - Create noise barrier and consider the minimum noise levels at sensitive receptor sites (e.g. dense residential area, schools, mosques, health centers etc.); - Stone breaking machine should be confined within a temporary shed so that noise pollution could be kept minimum; - Protection devices (ear plugs or ear muffs) shall be provided to the workers operating in the vicinity of high noise generating machines during construction; - Construction equipment and vehicles shall be fitted with silencers and maintained properly; - Instruction to the drivers to avoid unnecessary horn; - The Noise level monitoring should be carried out by the contractor following the National Noise Quality Standard (Schedule-4: Standards for Sound, ECR, 1997 and Noise Pollution (control) rules 2006). - Vibration monitoring should be carried out by the contractor. 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
Ground Water Pollution	<ul style="list-style-type: none"> ● Contamination of groundwater due to Pollution lack of septic tanks or mobile toilets; ● Accidental spillage of hazardous liquid from the construction camps. 	<ul style="list-style-type: none"> - - The contractor will make arrangement for water required for construction in such a way that the water availability and supply to nearby communities remain unaffected; - Handling and storage of the potential contaminants has to be organized under strict condition to avoid water pollution during construction; - Handling of hazardous liquid should be done carefully by the designated experienced person; - Handling and storage of the potential contaminants should be done by the experienced workers. Proper monitoring should be done by the experienced person; - The Ground water quality monitoring should be carried out by the contractor following the National Water Quality Standard (Schedule-3: Standards for Water, ECR, 1997). 	Contractors	PIU/ <u>BBIN</u> -MPA
Surface Water Pollution	<ul style="list-style-type: none"> ● Construction & general wastes from the construction sites; ● Oil spill from the construction vehicles and construction camp can effect on fishes and aquatic wildlife (such as snakes, frogs etc.) 	<ul style="list-style-type: none"> - Contractor should prepare waste and Wastewater Management Plan and follow it properly during the construction period; - Any wastes should not be throwing into the river/khal/canal other than disposing to the designated waste dumping area; - Store the oil and petroleum product in a separate location cover by a concrete structure; - Handling of hazardous liquid should be done carefully by the designated experienced person; - Monitor the surface water by testing in designated laboratory should be done by the Contractor following the National Water Quality Standard (Schedule-3: Standards for Water, ECR, 1997). 	Contractors	PIU/ <u>BBIN</u> -MPA
Land/ Soil Pollution	<ul style="list-style-type: none"> ● Decrease the production capacity of agricultural land; ● Land or soil erosion from water or wind; ● Sediment pollution and increase the turbidity; ● Reduction the microorganism. 	<ul style="list-style-type: none"> - Avoid the productive land, agricultural land, archaeological sites, protected area, forest area, natural habitat etc.; - Land/soil quality should be ensured by the contractor to fill the abutment area and approach road; - Soil from fallow land should be used in earthwork in approach road; - Re-vegetation the exposed area as early as possible to reduce the soil erosion; - Create barrier for reducing the sedimentation into the water bodies; - The Land or soil quality test should be carried out by the contractor. 	Contractors	PIU/ <u>BBIN</u> -MPA
Waste (Solid, Liquid and Hazardous) Pollution	<ul style="list-style-type: none"> ● Improper storage and handling of construction & general liquid waste such as fuels, lubricants, chemicals and hazardous liquid 	<ul style="list-style-type: none"> - The contractor will minimize the generation of sediment, oil and grease, excess nutrients, organic matter, litter, debris and any form of waste (particularly petroleum and chemical wastes); 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
<p>Organic waste: remaining foods, leaves, papers, straw, fruit cover etc.</p> <p>Inorganic waste: Polythene, Glasses, Synthetic paper, plastic etc.</p> <p>Hazardous waste: Paint, fuel, chemicals, oil, petroleum products, bitumen etc.</p>	<p>onsite, and potential spills from these liquid materials may harm the environment and health of construction workers.</p> <ul style="list-style-type: none"> ● Improper storage and handling of construction & general solid wastes. ● 	<ul style="list-style-type: none"> - Any wastes should not be throwing into the river/khal/canal other than dump into the designated waste dumping area; - Handling of hazardous liquid should be done carefully by the designated experienced person; - Organic waste should be managed by composting method. A concrete chamber with 3 rooms is needed to be provided. In one room organic waste should be dumped and another room inorganic waste will be dumped. When the room will be filled then covered by earth. Then dump to the third room. After 6 month organic waste will be converted into fertilizer and will be used by the farmers; - Inorganic waste should be given to the authorized vendor for free of cost for recycling; - Accidental spillage of hazardous waste should be managed by spreading wood powder on the surface of the oil and this powder mixed with oil must store in a designated concrete room; - Provide appropriate PPE to the construction personnel for handle construction materials; - Make sure all containers, drums and tanks that are used for storage are in good condition; - Take all precautionary measures when handling and storing fuels and lubricants, avoiding environmental pollution; - Wastewater monitoring should be carried out by the contractor, following the national standard (Schedule-10: Standard for waste from Industrial units or Projects waste). 		
Hydrological Regime	<ul style="list-style-type: none"> ● Drainage congestion and flood at the site; ● Erosion and siltation at the site. 	<ul style="list-style-type: none"> - A detailed hydrological and morphological study of the site (in case of bridge or other water related structures) should be conducted; - Proper design and construction accordingly to accommodate design flows; - Provision of sufficient sizes of drains to take design flows; - Wastes should not be disposed near any water body. All waste depending on its characteristics, should be disposed of in a controlled manner. 	Contractors	PIU/ <u>BBIN</u> -MPA
Sand Extraction/River dredging/Canal Re-excavation	<ul style="list-style-type: none"> ● Impact on river ecology ● Changes in the river morphology including erosion of banks and loss of agricultural land, etc. 	<ul style="list-style-type: none"> - Material sourcing will be thoroughly assessed in the project ESIA. - Contractors will be prohibited from opening new areas in local Rivers for extracting and/or sourcing sands, including areas in local rivers that remain in relatively good natural conditions and areas that support fish of conservation importance. - Community adjoining local rivers will be mobilized in the monitoring of contractors. 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
Drainage Congestion	<ul style="list-style-type: none"> ● Construction of diversion road on the river/ Khal/canal create drainage congestion; ● Stockpiling of construction materials in the river/khal/canal also create drainage congestion. 	<ul style="list-style-type: none"> - Pier of the existing bridge structures and other construction waste should be clearly removed from the construction site during dismantling of existing structure; - Construct diversion road on the river/khal/canal by keeping provision of open space so that water flow cannot hamper by the construction activities; - Immediately remove all the construction debris from the construction site as well as from the water bodies in a planned way; - Duration of stockpiling should be minimized as much as possible; - Avoid the encroachment of the water bodies; - Protect water bodies from sediment loads by silt screen or bubble curtains or other barrier; - Construction activity should be recommended during the dry season; - Construction workers shall be instructed to protect water resources; 	Contractors	PIU/ <u>BBIN</u> -MPA
Road Traffic and Accidents	<ul style="list-style-type: none"> ● Increased traffic use of narrow access road by construction vehicle will affect the movement of normal road traffics and the safety of the road users specially the students 	<ul style="list-style-type: none"> - Proper Traffic Management Plan (TMP) should be prepared by the contractor during starting of construction & follow it strictly; - In this TMP, the road safety measures such as speed breakers, warning signs/lights, road safety signs, flagman etc. should be included to ensure uninterrupted traffic; - Movement specially at nearby the educational (Schools, colleges, Madrasha etc.), community infrastructure (mosques, graveyards, Prayer Ground etc.) and health complex; - In addition, BRTA traffic rules and regulations should be strictly followed; - Divert traffic to follow alternative routes to avoid traffic jams; - Avoid talking with mobile during driving. 	Contractors	PIU/ <u>BBIN</u> -MPA
Landscape and Aesthetics	<ul style="list-style-type: none"> ● Excavation of borrow pits, stock piling of construction materials, placing of construction equipment and parking of construction vehicles; ● Presence of construction camps, equipment and their activities; ● Movement of construction vehicles on the existing road network and temporary haul roads; 	<ul style="list-style-type: none"> - Parking of construction vehicles and stockpiling of construction materials/excavated earth should be done in systematic way to avoid the damaging of aesthetics of the site; - Duration of stockpiling should be minimized as much as possible; - Vegetation plantation after completion of the construction work; - Completely remove the construction camp facilities, equipment's and their activities; - Limit the speed of the vehicles and cover the vehicles during the movement or transportation of materials on the existing road network and temporary haul road; - Plantation of trees at the construction site after completion of the construction activities immediately. 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	<ul style="list-style-type: none"> ● Closure of existing bridges by construction of diversion road. 			
Occupational Health and Safety	<ul style="list-style-type: none"> ● Campsites for construction workers and Safety are the important locations that have significant impacts such as health and safety hazards on local resources and infrastructure of nearby communities. 	<ul style="list-style-type: none"> – Construction workers camp shall be located at least 500 m away from the nearest habitation; – Consider the location of construction camps away from communities in order to avoid social conflicts; – Create awareness among the camp users on health and safety requirements to be maintained and code of conduct. 	Contractors	PIU/ <u>BBIN</u> -MPA
	<ul style="list-style-type: none"> ● Lack of proper infrastructure facilities, such as housing, water 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"> – Adequate housing for all workers should be provided avoiding over crowding; – Safe and reliable water supply; – Hygienic sanitary facilities and sewerage system. 	Contractors	PIU/ <u>BBIN</u> -MPA
	<ul style="list-style-type: none"> ● Management of wastes is crucial to minimize impacts on the environment. 	<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 container and inorganic wastes in another container at sources; – Dispose organic wastes in a designated safe place on daily basis; – The organic wastes should be always covered with a thin layer of sand so that flies, mosquitoes, dogs, cats, rats, etc. are not attracted; – Locate the garbage pit/waste disposal site minimum 500m away from the resident area so that people are not disturbed with the odor likely to be produced from anaerobic decomposition of wastes at the waste dumping places. 	Contractors	PIU/ <u>BBIN</u> -MPA
	<ul style="list-style-type: none"> ● Risks of diseases to be transmitted including malaria, exacerbated by inadequate health and safety practices. 	<ul style="list-style-type: none"> – Provide adequate health care and sanitation facilities within the construction sites; – Train all construction workers in basic sanitation and health care issues and safety matters and on the specific hazards of their work; – Provide HIV awareness programming, including STI (sexually transmitted infections) and HIV information, education and communication for all workers on regular basis; – Regular mosquito repellent spraying during monsoon periods. 	Contractors	PIU/ <u>BBIN</u> -MPA
	<ul style="list-style-type: none"> ● Risk of work crews spreading sexually transmitted infections and HIV/ AIDS. 	<ul style="list-style-type: none"> – Regular mosquito repellent spraying during monsoon periods. 		
	<ul style="list-style-type: none"> ● Health and safety risks to the construction workers and site 	<ul style="list-style-type: none"> – Provide the workers a safe and healthy work environment; 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	visitors leading to severe injuries and deaths.	<ul style="list-style-type: none"> - Provide appropriate 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; - 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 before commencement of civil works and establishment of construction camps so as to maintain effective surveillance over public health, social and security matters. 		
	<ul style="list-style-type: none"> ● Lack of first aid facilities and health care facilities in the immediate vicinity will aggravate the health conditions of the victim. 	<ul style="list-style-type: none"> - Provide health care facilities and first aid facilities are readily available; - Document and report occupational accidents, diseases, and incidents and actions taken; - Identify potential hazards to workers, particularly those that may be life threatening and provide necessary preventive and protective measures; - Provide awareness to the construction drivers to strictly follow the driving rules; - Provide adequate lighting in the construction area and along the roads in the construction site. 	Contractors	PIU/ <u>BBIN</u> -MPA
Community Health and Safety	<ul style="list-style-type: none"> ● Accidents on the approach road and construction site; ● Noise and dust pollution; ● Communicable diseases can spread among the local community. ● Risk of SEA/SH 	<ul style="list-style-type: none"> - Include the related E&S provisions in the C-ESMP/O-ESMP with payment milestones. - Prior to start the construction activities contractor will be informed the local community; - Instruct the drivers and limit the speed of the vehicles; - Regular health checkup of the workers and awareness training about the communicable diseases; - Ban all swimming and fishing activities in the construction site, in case of a bridge site; - Proper lighting at the project site during the night time; - Avoid unnecessary noise pollution; - Spraying water in the dry surface to reduce the dust pollution - Provide proper access control to the project site and unauthorized entry to the project site will be controlled by deploying security personnel. - Enforce a Code of Conduct for all the workers - Set up and run a SEA/SH compliant GRM 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
		<ul style="list-style-type: none"> - Raise awareness among the workers, communities and stakeholders on SEA/SH and the project GRM 		
Labor Union	<ul style="list-style-type: none"> ● Slow down the progress and haphazard conditions in the construction sites may arise 	<ul style="list-style-type: none"> - Strict implementation of labor laws - Face to face meetings and signed some agreements - Regular monitoring of the labor sites to note down any negative aspects. 	Contractors	PIU/ <u>BBIN</u> -MPA
Security	<ul style="list-style-type: none"> ● May affect the project economically and also result in loss of resources 	<ul style="list-style-type: none"> - Code of conduct, behavior commitments, clear and accessible disciplinary process, and grievance process; - Engagement with communities about the project's impacts on community safety and security, awareness raising concerning the Code of Conduct commitment and project grievance mechanism, as outlined in the Stakeholder Engagement Plan (SEP) - Policy on "use of force" and clarity on proportionality to risk. The use of force by direct or contracted workers in providing security should not be sanctioned except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. - Incident reporting: means of receiving and reporting incidents and allegations, and guidelines for receiving and following up on them, including procedures for reporting to the Borrower and the Bank, as required. - Site access control: guidelines for security personnel on how to interact with community members seeking access to a project site or raising a concern (for example, training on the grievance mechanism and Code of Conduct). - Any allegations of criminal behavior should be reported to relevant authorities, whether from private or public security, employees or contractors. - If gender-based violence or sexual exploitation and abuse issues arise or are alleged during project implementation or supervision, Bank Management must be alerted immediately. Security-related allegations or incidents can include issues such as theft, abuse of power and retaliation, sexual harassment and exploitation, gender-based violence, and bribery and corruption. 	Contractors	PIU/ <u>BBIN</u> -MPA
SEA/SH Issues	Greater exposure to communicable and sexually transmitted diseases including HIV/AIDS due to influx of outsiders such as traders, businesspersons, skilled and unskilled migrant laborers, transport	<ul style="list-style-type: none"> - A Gender and SEA/SH Action Plan is prepared for the project that details the relevant mitigation measures both preventive and curative, and as well includes specific actions to promote gender and women empowerment. 	Contractors	PIU/ <u>BBIN</u> -MPA

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	workers, etc. all of which may also potentially lead to social tensions among the local communities			
Operation Phase				
Air Pollution	<ul style="list-style-type: none"> ● Dust emission from the increasing number of vehicles in the site area; ● Vehicular emission from burning fuels. 	<ul style="list-style-type: none"> – Establish the speed breaker to limit the speed of the vehicle near the site; – Strictly follow the BRTA rules and regulations; – Increase number of plantation by adding new species of trees on the appropriate locations after consultation with the concern authority. 	MoC, BLPA, NBR and RHD	Relevant Ministries with the assistance of DoE
Surface Water Pollution	<ul style="list-style-type: none"> ● Remaining construction materials may be washed by the rainfall into the water sources and lead to sedimentation and increase turbidity; ● Hazardous materials spilled by accidents; ● Soil erosion during rainy season can contaminate nearby surface water. ● 	<ul style="list-style-type: none"> – Remaining construction materials will be completely removed from the proposed project site after completing of the construction activities; – Cover the bare surface by plantation of trees/vegetation to reduce the surface soil erosion; – Speed control measures close to the site to reduce the occurrence of accidents; – Bank protection work can be done at the site; – Avoid rainy season for continuing any development activities. 	MoC, BLPA, NBR and RHD	Relevant Ministries with the assistance of DoE
Ground Water Pollution	<ul style="list-style-type: none"> ● Accidental spillage of hazardous chemicals and materials. 	<ul style="list-style-type: none"> – Speed control measures close to the site to reduce the occurrence of accidents; – Inform to the concern authority to take necessary action to reduce the contamination of groundwater. 	MoC, BLPA, NBR and RHD	Relevant Ministries with the assistance of DoE
Hydrology and Flood pattern	<ul style="list-style-type: none"> ● Increase flood/ water logging/ drainage condition; ● Encourage for erosion and siltation. 	<ul style="list-style-type: none"> – During the planning stage and site selection local hydrology and flooding level will be considered; – Vertical navigation clearance should be kept in design and planning; – A separate and details hydro-morphological study should be conducted before starting construction activities; – Site should be clean properly after completion of the construction activities so that the natural drainage system may not hampered. 	MoC, BLPA, NBR and RHD	Relevant Ministries with the assistance of DoE
Noise Pollution	<ul style="list-style-type: none"> ● Faulty engine and hydraulic horn may increase the noise level. 	<ul style="list-style-type: none"> – Necessary instruction for the drivers; – Establishment of signboard near the sensitive receptors like mosques, schools, temple, bazar etc. 	MoC, BLPA, NBR and RHD	Relevant Ministries with the assistance of DoE
Flora and Fauna	<ul style="list-style-type: none"> ● Dust will hinder vegetation growth; 	<ul style="list-style-type: none"> – Re-plantation of various suitable local trees can be done on the slopes of the roads or the suitable locations around the project site; 	MoC, BLPA, NBR and RHD	Relevant Ministries with

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
	<ul style="list-style-type: none"> ● Increase number of death of wildlife and collision with the vehicles; ● Avifauna will be affected by the movement of vehicles; ● Fish and other aquatic animals will be affected. 	<ul style="list-style-type: none"> - Establishment of speed breaker or signboard indicating the movement route of the wildlife; - No disturbance for aquatic animal and keeps provision for the fish and other aquatic animals movement; - Diversion road should be removed properly as soon as possible; - Construction workers shall be instructed to protect natural resources, flora and fauna, including wild animals; - Natural river/khal/canal will be reinstated after completion of construction works; - Fingerling (fish) can be released to the river/khal/canal near the bridge site to boost up the fish resources. 		the assistance of DoE
Landscape and Aesthetics	<ul style="list-style-type: none"> ● Land use of the proposed project area will be changed; ● Improper removal of construction camp facilities and other construction waste will affect landscape and aesthetics. 	<ul style="list-style-type: none"> - Tree/vegetation plantation at the suitable site; - Proper removal of construction camp facilities and construction wastes from the site after completion of the works; - Excavated borrow pit area will be properly managed by the contractor, it will be preferred to use dredging materials after quality testing. 	MoC, BLPA, NBR and RHD	Relevant Ministries with the assistance of DoE
Labor Union	<ul style="list-style-type: none"> ● Slow down the progress and haphazard conditions in the sites may arise 	<ul style="list-style-type: none"> - Strict implementation of labor laws - Face to face meetings and signed some agreements - Regular monitoring of the labor sites to note down any negative aspects. - Revisit the agreements and do necessary changes. 	MoC, BLPA, NBR	Relevant Ministries with the assistance of DoE
Security	<ul style="list-style-type: none"> ● May affect economically and also result in loss of resources ● May result in national security issues 	<ul style="list-style-type: none"> - Policy on "use of force" and clarity on proportionality to risk. The use of force by direct or contracted workers in providing security should not be sanctioned except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. - Incident reporting: means of receiving and reporting incidents and allegations, and guidelines for receiving and following up on them, including procedures for reporting to the Borrower and the Bank, as required. - Site access control: guidelines for security personnel on how to interact with community members seeking access to a project site or raising a concern (for example, training on the grievance mechanism and Code of Conduct). - Any allegations of criminal behavior should be reported to relevant authorities, whether from private or public security, employees or contractors. 	MoC, BLPA, NBR	Relevant Ministries with the assistance of DoE

Issues/ Activities	Potential E&S Impacts	Proposed Mitigation Measures	Responsibility	
			Implementation	Supervision
		<ul style="list-style-type: none"> - If gender-based violence or sexual exploitation and abuse issues arise or are alleged during project implementation or supervision, Bank Management must be alerted immediately. Security-related allegations or incidents can include issues such as theft, abuse of power and retaliation, sexual harassment and exploitation, gender-based violence, and bribery and corruption. 		

Environmental Codes of Practice (ECoPs)

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

6. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

6.1 General

This chapter outlines the framework for assessing and managing environmental and social issues in different sub-projects. It also provides necessary procedures and tools for screening and assessing environmental and social impacts. Each phase-wise development's environmental and social assessment need to be carried out based on the provisions of the Environment Conservation Acts and Rules of GoB, ES Management Principles and the relevant World Bank's Environmental and Social Standards (ESSs).

6.2 ES Management Principle

Due to the nature of some of the proposed project activities of BBIN- RTTF 1 and their potential environmental and social risks and impacts, the project falls under 'RED' category according to ECR, 1997 and also rated as 'HIGH' as per the World Bank ESS1 risk category. This requires detailed ESIA and execution of environmental and social management plans for relevant sub-projects. Therefore, the ESMF is prepared based on the following principles that can lead the planning and implementation of the project activities.

1. The PCC/BBIN-MPA Program at the national level and Project Directors (PD) of PIUs of the IAs at the project level are responsible for the compliance with national policies, regulations, and WB ESSs and Guidelines, as mentioned in this ESMF report. The ESMF will serve as the basis for ensuring ES compliance.
2. PDs of the respective PIUs/BBIN- MPA program, is responsible for obtaining environmental clearance from DoE, local government agencies and World Bank, as required. IEE, ESIA and ESMP need to be prepared for activities as determined by DoE. In case, requirements of DoE's ESIA guideline differ from those of WB ESF, the more stringent standards and requirements will apply. Planning and design of the any additional activities should ensure ES screening, based on which further ES assessment will be carried out to develop proper ESMP.
3. Environmentally Sensitive areas, cultural sites, restricted or disputed lands (of identified during project implementation) should be taken care of with appropriate mitigation or compensation measures during implementation.
4. Participation of stakeholders (especially local communities) should be ensured by PIUs/BBIN- MPA program in planning, implementation and monitoring of each sub-components and associated activities.
5. PIUs will inform project stakeholders about project interventions and its potential impacts on the surrounding ES elements. PIUs/BBIN- MPA program will ensure appropriate institutional set up for implementing environmental and social management plan and inter-agency coordination. PIUs should also ensure that bidding documents for construction contractors have specific clauses to ensure implementation of ESMPs, as required.
6. Contractors to be engaged for construction/renovation/expansion/repair and maintenance and equipment installation under the project will ensure provision of First Aid Kit at camp/work site with proper drinking water and sanitation facilities. Worker's/crew's health and safety measures shall be ensured and use of personal protective equipment shall be at place.
7. PIU/BBIN- MPA program, will ensure safety provision has been provided for the resettlement sites.
8. PIU/BBIN- MPA program will undertake public disclosure about the project interventions and potential impacts.
9. In case co-financing PIU/BBIN- MPA program by other development partners, apply ESF to all activities throughout the project cycle. All E&S assessments, instruments and documents will be prepared in accordance with the ESF and the Bank will conduct its due diligence of these instruments and documents. During implementation, the GoB will supervise and monitor E&S risks

and impacts of the entire project activities, in accordance with the E&S instruments and documents and will ensure all supervision records and project sites are accessible to both WB and DPs. WB and DPs may also conduct joint supervision missions. However, there will be a single Grievance Redress Mechanism (GRM) covering the PIU/BBIN- MPA program.

6.3 Environmental and Social Assessment and Management Process

- PIUs in coordination of the ES experts of the 4 PIUs will provide technical backstopping and coordination support to the PCC to perform the ES screening of the respective components of the BBIN-MPA Program. The relevant ES experts of PIUs will start the task during the initial stage of the project implementation.
- If ES Screening would identify any activities that requires further ES Assessment, respective PD of that PIU in coordination of other relevant staff will engage an independent ESIA consulting firm to generate a detail ES baseline of the project, conduct initial scoping (or IEE) and prepare a ToR for ESIA study.
- PIUs will share the scoping/IEE report along with the draft ESIA ToR to respective clearance office of DoE.
- PCC with support of the respective PIU will review, and clear screening and environmental assessment reports made by Environmental consultant before submitting for DoE clearance and provide necessary technical inputs.
- PCC through 4 PIUs will conduct verification of some screening and assessment through field visit.
- PIUs through relevant ES staff will ensure that environmental considerations are given enough attention, weight, and influence over selection of construction sites and improvement of infrastructures.
- Bid documents will be prepared by the respective PIU. ES consultants of PIUs will make sure necessary ES clauses are included in the bidding documents and ESMP implementation should be done by Contractors. PIUs consultants and other technical and M&E experts will supervise ESMP implementation and ES compliance. Furthermore, preparation of ESIA and ESMPs should be added as a separate item before bidding document references.
- All the activities of BBIN-MPA Program will follow existing Environmental and Social Code of Practices (ESCoPs) prepared under ESMF.
- The project will ensure that ESIA addresses all potential ES 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, ESIA and ESMP should be reviewed and updated.

6.4 Environmental and Social Management Procedure

6.4.1 Overall Procedure

The overall environmental and social management procedure is shown in the figure below. After the sub-project has been developed with outline design and location/alignment options, screening of environmental and social risks can be done. It is expected that most of the sub-projects will require some form of feasibility study. This will help in the preparation of E&S documents such as IEE/ESA, ESIA, RAP and ESMP. The recommendations from these E&S documents need to be incorporated by the detailed design team and also incorporated into the tender (bidding) documents. PMU would then need to implement the proposed mitigation measures, monitor and report compliance.

6.4.2 Project Screening

The formal environmental and social assessment starts with proposed interventions' environmental and social screening (**Annex A**). The purpose of the environmental screening is to get relevant concerns addressed in the project's design phase. Environmental and Social Screening will determine whether sub-project interventions will require an IEE/ESA or a full scale ESIA. Using the screening forms, the proposed sub-projects interventions will be screened by PIU/PMC to identify any potential adverse impacts/effects from the sub project activities and stage of further assessment with preparation of separate environmental management plan to be required for the PIU under BBIN MPA program.

The environmental and social screening would involve: (i) reconnaissance of sub-project area and its surroundings; (ii) identification of major sub-project activities; and (iii) preliminary assessment of the impacts of these activities on the ecological, physico-chemical and socio-economic environment of the sub-project surrounding areas and considerations that need to be further investigated through IEE/ESA or ESIA.

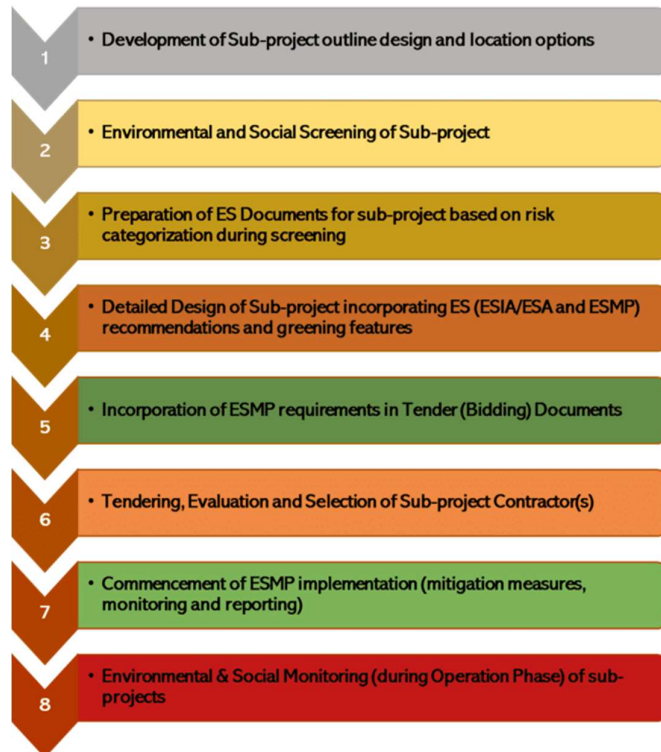


Figure 6.1: Overall Procedure of Environmental & Social Management

6.4.3 Environmental and Social Impact Assessment

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.

The ESIA's will utilize a well-planned and all-inclusive communication and consultation strategy and include a baseline survey covering the prevailing status of income, employment, education, age, skills and other socio-economic aspects along with cultural and community aspects in the areas. The assessment will feed into the individual Resettlement Plans prepared for each site and will be incorporated, along with consultation feedback from those identified in the PAP census and all other relevant stakeholders, in the development of mitigation measures, especially livelihood strategies.

IAs will undertake a survey for identification of the persons and their families likely to be affected by the project. Every survey shall contain the following information of, the project affected families-

- Members of families who are residing, practicing any trade, occupation or vocation in the project affected area;
- Project Affected Families who are likely to lose their immovable assets, commercial establishment, agricultural land, employment or are alienated wholly or substantially from the main source of their trade occupation or vocation;
- Families belonging to indigenous categories;
- Vulnerable persons;
- Families that are landless (not having homestead land, agriculture land or ether homestead or agriculture land) and are below poverty line, but residing in the affected area;
- Losing access to private property or common property resources.

IAs on completion of the assessment will disseminate the results among the affected community. Based on the assessment, the project will prepare an action plan to mitigate or minimize the adverse impacts identified during the survey. The draft mitigation plan in form of a RAP will be again disseminated among the affected individuals/ community. The feedback received from the affected groups will be incorporated to the extent possible before finalization of the RAPs. Procedure of RAP has been separately discussed in detail in the Phase 1 Resettlement Policy Framework (RPF).

The initial screening carried out as part of preparation of this ESMF has not found any indigenous communities as potential project affected persons (PAPs). However, additional in-depth screening and assessment will be carried out during site-specific ESIA/ESMP preparation and if at that time, such indigenous communities are found, relevant mitigation measures will be put forward with relevant small ethnic community development plan, with “free, prior and informed consent” as relevant.

According to the project implementation planning, the activities that need ESIA will be implemented at different periods and hence, site-specific ESIA will be required prior to the actual intervention start. In the preparation phase, the ESIA shall achieve the following objectives-

- To establish the environmental and social baseline in the study area (**a guideline to establish the baseline is given in Section 4.4**), 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 the environmental mitigation and enhancement measures suggested.

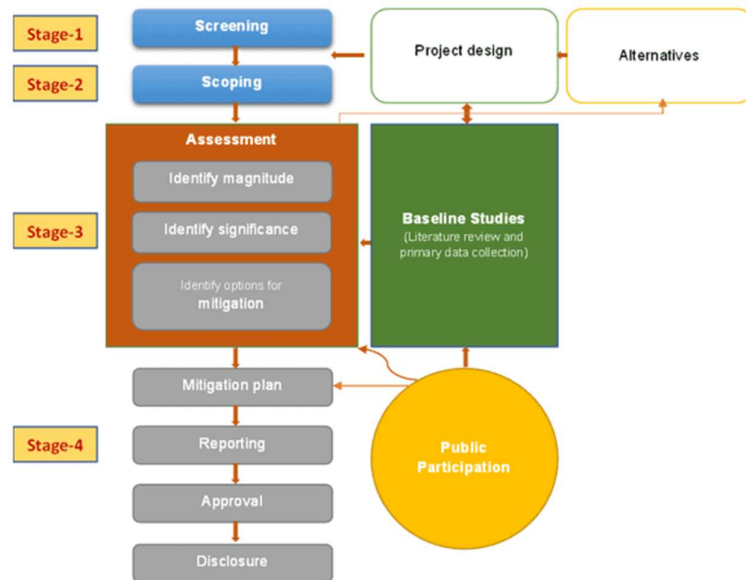
The impact assessment will be conducted using major stages as shown in the Figure 6.3.

Stage 1: Planning

Soon after the commencement of project, based on desk study, reconnaissance survey and experience of earlier similar projects, detailed methodology and schedule should be prepared for the effective and timely execution of the Environmental and Social Impact Assessment.

- **Desk Study:** To collect the secondary information and checking out the methodology for carrying out the ESIA study and fixing of responsibilities of the EA team members for preparing a complete, addressing all issues, Environmental and Social Management Plan.
- **Reconnaissance survey:** To collect the first-hand information about the project area and develop a perspective of the entire team and revise the methodology and work program.
- **Experience from Earlier Project:**
 - **Focus on the main issues:** The ESIA must not try to cover too many topics in too much detail. Effective scoping can save both time and money by focusing the ESIA studies on the key issues.
 - **ESIA requires the formation of a multidisciplinary team and the leadership of a strong Coordinator.** The range of effects considered in the ESIA requires the skills of technical experts to be employed on an assessment team, led by a Team Leader. It is important to involve the right people (e.g., scientists, engineers, policymakers, government representatives, representatives of public interest groups and the local community) and agencies (e.g., the developer, the aid agency, regulatory authorities and politicians) in the ESA process. Selection will be made through consultation at different stages.
 - **Make maximum use of existing information before engaging expensive field studies.**
 - **Determination of Project influence Area.** The project influence area will be finalized based on the reconnaissance survey and desk study and technical assessment.
 - **Present clear and appropriate options for mitigation of impacts and for sound environmental and social risk management.** Mitigation is an integral part of impacts assessment. Application of appropriate mitigation can eliminate or reduce negative impacts, and improve the net overall environmental performance of a project. Hence, public consent and practical viability will be considered in proposing mitigation measures.

○ **Post-ESIA audits and monitoring programs are essential to ensuring that ESIA commitments are carried out and that future ESIA improve.** An effective monitoring plan will be proposed in consultation with the client and the World Bank. Proper budgeting will be ensured for smooth functioning of monitoring plan proposed.



Stage 2: Scoping

Scoping will identify which of the activities has a potential to interact with the environment. Scoping will be conducted early in the ESA process so that a focus on the priority issues (i.e., those that have the greatest potential to affect the natural and/or environment) can be established for the rest of the ESA process. After scoping, necessary consultation with stakeholders will be made to incorporate any unattended issues. Key elements/inputs to the scoping exercise will be as follows:

- Gathering and reviewing existing environmental data like atmosphere, climate, topography, congestion area, alternative requirement, land use pattern, hydrology and drainage pattern, major River and waterways, religious, cultural and archaeological sites and sensitive areas.
- Identifying project stakeholders; including PAPs, marginalized and vulnerable groups, women, poorest of the poor, Government and nongovernment agencies (utilities), Bangladesh Water Development Board, LGED, Agricultural Department, Department of Environment (DoE), local government institutions, other relevant government department and ministries, etc.
- Assemble and review relevant legislative requirements, environmental and social standards and guidelines (national and international) associated with the proposed development, and the World Bank's operational policies and standards.
- Gathering existing information sources and local knowledge;
- Informing stakeholders of the project and its objectives and get input on the ESA;
- Identifying the key environmental concerns (community and scientific) related to a project and the relative importance of issues;
- Defining/preparing the ESA work program, including a plan for public and stakeholder involvement;
- Carrying out monitoring of natural environment including air, water, soil, noise etc.
- Defining the range of project alternatives to be considered.
- Obtaining agreement/consensus on the methods and techniques to be used in ESA studies and document preparation;
- Determining/freezing the spatial and temporal boundaries for the ESA studies.

1. The following issues will be addressed through scoping, but will not be limited to.

- To improve the quality of ESA information by focusing scientific efforts and ESA analysis on truly significant issues;
- To ensure environmental concerns identified and incorporated early in the project planning process, at the same time as cost and design factors are considered;
- Reducing the likelihood of overlooking important environmental issues;
- Thinning the chance of prolonged delays and conflicts later in the ESA process by engaging stakeholders in a constructive participatory process early in the ESA process.

Stage 3: Environmental and Social Impact Assessment

After conducting ESA/IEE, if necessary, the ESIA should be conducted, as per ToR for ESIA suggested in ESA/IEE and cleared by DoE. The process of ESIA study is briefly described below:

- **Analysis of the Project Components:** All the RHD, MoC, BLPA, NRB components and design specifications will be analyzed to get insight into the project activities. This will guide detail environmental baseline survey and particular investigations.
- **Data collection on Environmental and Social Baseline:** The proposed subprojects' environmental and social baseline conditions will be collected through field visits, surveys, and intensive consultation with local people. Intensive consultation with the stakeholders should be carried out to update the baseline condition to obtain their perceptions of the proposed activities and the possible impacts. A guideline to establish the baseline is given in Section 4.4.

- **Major Field investigations:** At this stage, detailed field survey (social and environmental) will be carried out to obtain information on the possible impact of the interventions on the environmental parameter.
- **Assessment of Impacts:** The impacts of the proposed subprojects on the environmental and social components will be identified through consultation with experts and local community. The impacts will be analyzed and graded qualitatively (e.g., high, medium, low) in order to identify the major impacts. The future-without-project (FWOP) condition will be generated through trend analysis using information collected. The future-with-project (FWIP) condition will be predicted using professional judgment of the multi-disciplinary team members based on information collected. Difference between the two (FWIP-FWOP) conditions will be taken as impact of the proposed interventions. The impact will also be monitored. Moreover, cumulative impacts of the project inside or outside the project area will be analyzed. Possible mitigation measures for alternatives of the project will be identified in this stage. For true impacts prediction following questionnaire will be attempted to answer:
 - How will a particular project activity give rise to an impact?
 - How likely is it that an impact will occur?
 - What will be the consequence of each impact?
 - What will be the spatial and temporal extent of each impact?
- **Evaluation of impacts:** Impact assessed on different parameters will be evaluated for both positive (+) and negative (-) impacts considering magnitude, immediacy, reversibility and sustainability. Phase I ESIA studies will be used to understand the impact assessment for subsequent phases. Impacts can also be quantified for the infrastructure projects; a typical subproject can evaluate the impact using the formula described below:

➤ **Impact Assessment of Infrastructure Project**

- **The Method of Assessment.** A simple methodology has been developed for Environmental Evaluation System (EES) developed by Battelle Columbus Laboratories in the United States. In Bangladesh, in absence of a database it is only possible to estimate the potential environmental changes from the existing situation. In this method, the existing environmental conditions will be the reference level and the positive and negative changes in environmental conditions resulting from the proposed project will be evaluated. The environmental impact will be assessed by Environmental Impact Values (EIVs), which may be defined mathematically as follows:

$$EIV = \sum_{i=1}^n (Vi) (Wi)$$

where V_i is the relative change in the value of environmental quality of parameter i with respect to existing situation, W_i is the relative importance or weight of parameter i , and n is the total number of environmental parameters related to the project.

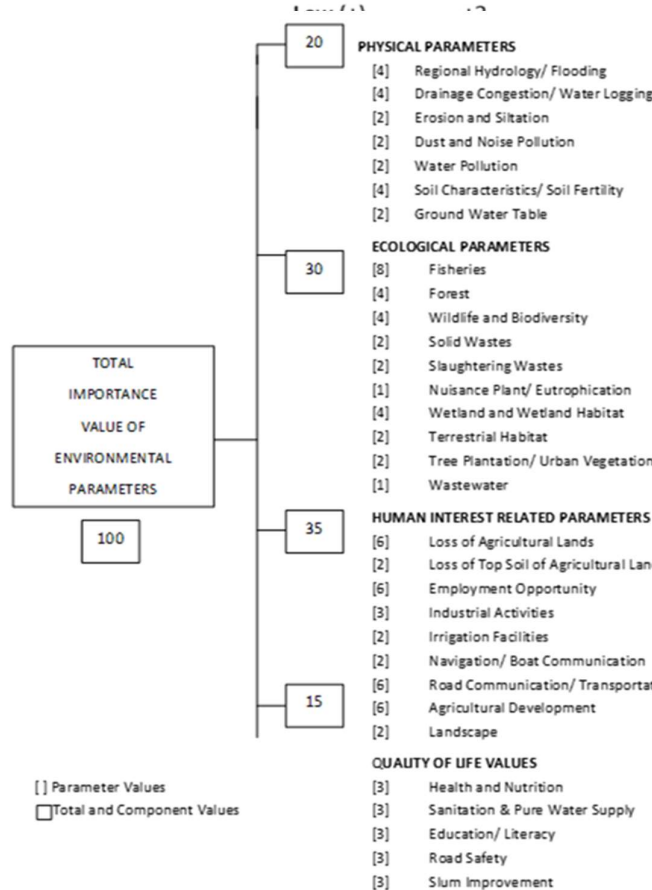
The computation of Environmental Impact Value (EIV) of a project needs determination of V_i , the value representing the magnitude of alteration of the environmental parameters, and W_i the value representing relative weight or importance of the respective parameters.

- **Magnitude of Environmental Alterations.** Change of environmental parameters should not be measured with respect to existing condition. The standard practice is to compare the future-with-project condition against the future-without-project condition, difference between these two are taken as the change in environmental parameters. The future-without-project condition should be generated through trend analysis using historical data collected during the establishment of baseline condition.

The beneficial and adverse changes in environmental parameters resulting from a project, usually expressed in qualitative terms have been plotted in a scale to quantify the

environmental alterations. Figure 6.2 shows the correlation between qualitative statement and proposed quantitative values of environmental changes resulting from a project. Since the changes of

Very High (-)	-5
High (-)	-4
Medium (-)	-3
Low (-)	-2
Very Low (-)	-1
No Change	0
Very Low (+)	+1



of Environmental Impact

environmental parameters are measured with respect to existing condition, no change has 0 values. Benefits or positive impacts are graded from +1 to +5, and negative impacts are scored from -1 to -5. Impacts are assessed quantitatively wherever possible. For example, if a project will positively impact agricultural productivity and the production will be increased by 50%, then a scoring of +3 is applied to agricultural productivity. Similarly, if assessed that the fish production will be decreased by 30%, a negative scoring of -2 is applied for the respective fishery component. A value from the scale representing

Figure 6.3: Typical Relative Importance Values of Environmental Parameters Related to Infrastructure Projects

effect of the project on each parameter will be taken to compute the EIV of the project.

Where it is not possible to directly quantify the impact in terms of increase or decrease in production, or deterioration of water quality or degradation of environment, the impact has to be estimated. For the purpose of estimation, positive and negative impacts are divided into three different groups, as Low, Medium and High. A low numerical value ranges from 1 to 2, Medium 3 and High with a numerical value ranging from 4 to 5.

- **Relative Importance of Environmental Parameters.** All environmental parameters influenced by the project are not of equal importance or weight. The importance of a parameter varies from country to country depending on the country's environmental concerns. Generally, in Bangladesh flood, employment, agriculture, fisheries etc. carry more importance than many

others. The importance may also vary in different regions within the country. So, the same parameter may have different values for subprojects located in different regions.

The parameters related to infrastructure projects have been given different values based on prevailing environmental concerns in Bangladesh and presented in Figure 6.5. These values have been arrived at after consideration of all probable impacts due to the project during its pre-construction, construction and post-construction stages. These are average values only based on normal conditions, which should be modified if the projects are located in special locations with significant environmental concerns. The values representing importance or weight of the parameters can be used to compute the relative impacts of the parameters which are then summed up to obtain the total EIV of the project. In Table 6.5 a sample calculation for determination of EIV has been shown. Relative Importance Values of Environmental Parameters shown in Figure 6.5 has been assigned considering the infrastructure development projects.

- **Preparation of Environmental and Social Management Plan:** The ESMP will be prepared suggesting mitigation measures for minimizing the effect of the negative impacts, compensation measures for the negative impacts which cannot be mitigated, enhancement measures for increasing the benefits of the positive impacts, emergency plan for taking care of natural hazards and accidental events. An environmental and social monitoring plan will also be suggested in the ESMP. Each component of the ESMP will be divided into pre-project, during project, post project and operation and maintenance phases. Responsibilities of the institutions in the implementation of the ESMP will be suggested to ensure efficient utilization of all the parties involved. The ESMP should also include institutional capacity assessment and capacity building plan.
- **ESIA Report Preparation:** All the findings would be presented in the ESIA reports as per ToR. A preliminary ToR for ESIA is given in Annex E. Annex F is an indicative guideline on preparing ESIA report.
- **Environmental Assessment and Management for Resettlement Sites:** Environmental assessment and management principles and requirements described above will be equally applicable for the construction of the resettlement sites (if any). If necessary, a generic guideline to conduct ESIA of resettlement site/s will be prepared during the detail ESIA.
- **Contingency Plan for COVID-19:** BBIN- MPA Program 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 articulate 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 GM with observations of anonymity protocol. 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.

Stage 4: Stakeholder Consultation and Public Disclosure

“Public consultation” refers to the process by which the concerns of affected persons and other stakeholders who have plausible stake in the environmental and social impacts of the project or activity are ascertained with a view to taking into account all the material concerns in the project or activity design as appropriate. As part of the stakeholder consultation process, all the relevant stakeholders will be identified with particular focus on directly affected persons and the disadvantaged and marginalized groups and peoples.

The consultations will ensure participation of all the relevant stakeholders and where necessary separate consultations will be organized for the women and disadvantaged and marginalized groups. After completion of the public consultation, the feedback on environmental and social risks and impacts will be addressed and appropriate mitigation measures will be included in the ESIA and ESMP. The final ESIA report, so prepared, shall be submitted by the client to the concerned authority for appraisal.

6.4.4 Environmental and Social Management Plan (ESMP)

This section presents the project's outline environmental and social management plan (ESMP). A more detailed version of ESMP must be included in the ESIA of the BBIN MPA Program subprojects.

6.4.4.1 Scope and Objectives of ESMP

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

- Identify the mitigation measures during ESMF and ESIA; and facilitate implementation of those during implementation of the project
 - 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.
2. 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 managing mitigation identified for each negative impact of the program. The management will clearly delineate the responsibility of various participants and stakeholders involved in the program's planning, implementation, and operation.

6.4.4.2 Inclusion of Relevant Components of ESMP in Contract Documents

The specific ESIA should include a section on special environmental clauses (SECs) to be incorporated in the Tender Document under General/Particular Specification. These clauses aim to ensure that the Contractor carries out his responsibility of implementing the environmental and social management plan (ESMP), monitoring plan, and 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 Environment Management Action Plan (EMAP) 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.

6.4.4.3 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. Effective implementation of the proposed mitigation and monitoring measures would attract trained and experienced environmental management staff.

6.4.4.4 Guideline to Incorporate Environmental and Social Management in Bid Documents

The PIU consultants will be responsible for incorporating environmental management requirements in the bidding documents, with the assistance of the environmental and social consultants. The generic guidelines to incorporate environmental and social aspects in the bidding documents are listed below. These are examples only and shall be further elaborated and expanded upon based on the findings and recommendations of the specific ESIA.

- Prepare cost estimates, to be incorporated in Bid Documents.
- Contractor version of the Environmental Management Plan along with the ESCoPs to be incorporated in the bid document's work requirements.
- Penalty clauses for not complying with ESMP requirements to be incorporated.
- Indicative penalty clauses are presented below (Addendum to Clause 17.2 Contractor's Care of the Works of FIDIC).
 - The contractor has to follow all traffic safety measures as defined in the technical specification. A specific amount shall be determined to handle the damage issue for non-conformity of traffic safety measures as per the decision of the PIU officials.
 - The contractor has to follow all environmental mitigation and management measures as defined in the technical specification read along with the Environmental and Social Management Plan for the specific project activities. . A specific amount shall be determined to handle the damage issue for non-conformity of traffic safety measures as per the decision of the PIU officials..
 - The contractor has to ensure that prior to every monsoon season, during the construction period; all the temporary and permanent cross drainage structures are free from debris as defined in the Technical Specifications read along with the ESMP. . A specific amount shall be determined to handle the damage issue for non-conformity of traffic safety measures as per the decision of the PIU officials.
 - The contractor has to ensure that a comprehensive Health and Safety program is in place for the duration of construction. Implementation of the program will include, among other aspects, ensuring that sufficient numbers and good quality Personnel Protective Equipment (PPE), should be provide to staff and labor all time as defined in the labor codes read along with the ESMP. . A specific amount shall be determined to handle the damage issue for non-conformity of traffic safety measures as per the decision of the PIU officials.
 - In addition, for any non-compliance causing damages or material harm to the natural environment, public or private property or resources, the contractor will be required to either remediate / rectify any such damages in a timeframe specified by and agreed with the engineer, or pay PIU for the cost (as assessed by NPIU) of contracting a third party to carry out the remediation work.
 - Since many contractors do not have clear understanding the need of environmental management, some quote very low price for implementation of ESMP and eventually cannot implement ESMP as per specific requirement of ESMP and project design. To avoid this problem, fixed budget may be assigned for ESMP implementation. The contractors may need orientation on the requirement of the ESMP in the pre-bidding meeting.

6.4.4.5 Environmental and Social Codes of Practice (ESCoPs)

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

- ESCoP 1: Waste Management
- ESCoP 2: Fuels and Hazardous Substances Management
- ESCoP 3: Water Resources Management
- ESCoP 4: Drainage Management
- ESCoP 5: Soil Quality Management
- ESCoP 6: Top Soil Management
- ESCoP 7: Topography and Landscaping
- ESCoP 8: Air Quality Management
- ESCoP 9: Noise and Vibration Management
- ESCoP 10: Protection of Flora
- ESCoP 11: Protection of Fauna
- ESCoP 12: Protection of Fisheries
- ESCoP 13: Road Transport and Road Traffic Management
- ESCoP 14: Construction Camp Management
- ESCoP 15: Cultural and Religious Issues
- ESCoP 16: Workers Health and Safety
- ESCoP 17: Security Management

6.4.5 Required Site Specific Management Plans (ESS 1-10)

The contractors of the sub-projects will prepare site Specific Management Plans. Selection of the management plans required by the sub-projects will be determined by the ESS requirements, applicable ESCoPs and recommendation of ESMP. WB will review and clear plans for substantial risk sub-projects. Those lower than substantial risk will be reviewed and cleared by PIU/PMC.

- i. **Contractor's Environmental and Social Management Plan (CESMP):** will be prepared and implemented by the contractor. This document will be reviewed by the IAs as well as by the WB. The plan shall be submitted prior to the start of the construction activities. The contractor will be responsible to implement this plan appropriately.
- ii. **Sand or soil borrowing plan (if required from river bed, agriculture land and wetlands):** will be prepared and implemented by the contractors on the basis of the ESCoPs. The Plan will describe among others the methodology to be adopted, restrictions to be followed, prior survey to be conducted, and documentation to be maintained for the sand extraction. The Plan will be submitted for review and approval before the sand extraction activity is initiated.
- iii. **Pollution Prevention Plan:** will be prepared and implemented by the contractors on the basis of the ESCoPs and WBG EHS Guidelines (1997) that will be part of the bidding documents. The Plan will be submitted for review and approval before contractor mobilization.
- iv. **Waste Disposal and Effluent Management Plan:** will be prepared and implemented by the Contractor on the basis of the ESMP, ESCoP, and WBG EHS Guidelines (1997), which will be part of the bidding documents. The Plan will be submitted for review and approval before contractor mobilization.
- v. **Drinking Water Supply and Sanitation Plan:** Separate water supply and sanitation provisions will be needed for the temporary facilities including offices, labor camps and workshops in order not to cause shortages and/or contamination of existing drinking water sources. A Plan will be prepared by the contractors on basis of the ESMP and ESCoPs, which are part of the bidding documents. The Plan will be submitted for review and approval before contractor mobilization.

- vi. **Occupational Health and Safety (OHS) Plan:** will be prepared and implemented by each contractor on the basis of the WBG EHS Guidelines (1997), ESCoPs, mitigation plan, and other relevant standards. The Plan will be submitted for review and approval before contractor mobilization. For labor-intensive maintenance works to be carried out by poor people in rural areas, OHS measures outlined in the Labor Management Procedures will be implemented by NPIU.
- vii. **Traffic Management Plan:** will be prepared by each contractor after discussion with NPIU and authorities responsible for roads and traffic. The Plan will be submitted for review and approval before contractor mobilization. The Plan will identify the routes to be used by the contractors, procedures for the local community's safety, particularly pedestrians, and a monitoring mechanism to avoid traffic congestion.
- viii. **Construction Camp Management Plan:** will be prepared by each contractor. The Plan will include the camp layout, details of various facilities including supplies, storage, and disposal. The Plan will be submitted for review and approval before camp establishment.
- ix. **Fuel and Hazardous Substances Management Plan:** will be prepared by each contractor in accordance with the standard operating procedures, relevant guidelines, and where applicable, material safety data sheets (MSDS). The Plan will include the procedures for handling the oils and chemical spills. The Plan will be submitted for review and approval before contractor mobilization.
- x. **Emergency Preparedness Plan:** will be prepared by each contractor after assessing potential risks and hazards that could be encountered during construction. The Plan will be submitted for review and approval before contractor mobilization.
- xi. **Plantation Plan:** A plantation plan will be prepared for the trees to be planted on the project construction site. The Plan will include the species to be planted, the plantation methodology, and plantation layout.
- xii. **Environmental Management of Resettlement Sites:** will be prepared by the Contractor in compliance with the stand-alone ESMP prepared for Resettlement Sites and presented in the main ESIA.
- xiii. **Health, Safety and Environment Plan:** will be prepared by NPIU to address solid waste and emergencies associated with workers and community health and safety and to properly manage waste effluents generated from the maintenance works. The Plan will be submitted to the World Bank for review and approval prior to completion of construction.
- xiv. **Resettlement Action Plan (RAP):** A separate RPF will be prepared to guide the preparation of RAPs for all the sub-projects.
- xv. **Communication Strategy:** A formal communication strategy will be prepared for the project laying out various communication needs and outreach tools and explaining the responsibility of PIU to convey the project impacts and its implications for various stakeholders. A key aspect of this strategy shall be communicating any project-related impacts.
- xvi. **Biodiversity conservation and monitoring:** During ESIA study in the project impact area, Detailed ecological studies will be carried out to broaden the existing baseline data. The ESIA of each component should identify potential sites of sensitive ecological area, mangrove area, fish conservation area, locations of dolphin conservation, habitat for coastal birds, sea turtle, etc. in the project area. The proposed study will confirm these locations, identify additional locations and islands/chars of conservation significance and prepare detailed conservation plans and implement these plans. A consulting firm will be hired to carry out the studies and to conduct biodiversity monitoring during the construction and post-construction periods.
- xvii. **Pest Management Plan:** it will be prepared during ESIA, this will be used to provide training of farmers and project staff based in research vessels on integrated pest control. A community NGO is suggested to engage to implement the IPM plan.

6.4.6 Consultation and Participation Plan (ESS10)

A separate SEP for all IAs has been prepared which discussed this ESS10 requirements elaborately. The overall framework for consultation is provided in the Chapter 7.

6.4.7 Labor Management Procedures (ESS2)

A standalone LMP for all IAs has been prepared to fulfill the requirement of ESS2 and will be disclosed by PIU/IAs.

Besides the LMP, separate OHS management plan will be developed and implemented at the project activities. To inspect the OHS plan at construction sites and its evaluation will be carried out with different checklist as given in **Annex G**.

6.4.8 COVID-19 Health and Safety of the Workforce

The project will require construction workers that may raise issues with manual labor employment, particularly regarding potential transmission risks for COVID-19 both within the worksite and for nearby communities. These risks are not only from workers that are mobilized locally but also workers moving from other regions/countries. The national COVID-19 response protocol along with the World Bank relevant guidelines will be adopted by the contractors and any consulting firms of such workers.

6.4.9 Implementation of the Solid and Hazardous Waste Management and Disposal

Solid and hazardous wastes (including water, reagents, infected materials, etc.) from facilities that are supported through the project can have a substantial impact on the environment and human health. Wastes that may be generated from lab facilities could include liquid contaminated waste, chemicals, and other hazardous materials, and other waste from labs and quarantine and isolation centers including sharp objects, used in diagnosis and treatment. Each recipient sub-project facility will follow the requirements of this ESMF, national legislation, WHO COVID-19 guidance documents, WBG EHS guideline for general facility design and waste management and any other relevant best international practices. The PMU will ensure the following-

- a. Hazardous waste is handled according to the regulatory requirements (i.e the Hazardous Waste Management Rules, 2011 etc.) and it covers all aspects of hazardous waste collection, storage, transportation and disposal;
- b. Each facility is operated in accordance with the ICWMP prepared based on the template attached in the ESMF and WHO COVID-19 Guidelines;
- c. Waste segregation, packaging, collection, storage disposal, and transport is conducted in compliance with the ICWMP and WHO COVID-19 Guidelines;
- d. Onsite waste management and disposal will be reviewed regularly and training on protocols contained in the ICWMP conducted on a quarterly basis;
- e. The PMU will audit any off-site waste disposal (including transportation of hazardous wastes) required on a quarterly basis and institute any remedial measures required to ensure compliance; and
- f. Waste generation, minimization, reuse and recycling are practiced where practical in the COVID-19 context;
- g. All relevant staff regularly undergoes refresher training on solid and hazardous waste management. Additionally, information posters will be provided for all location where such waste might be generated (laboratories, stores, warehouse, dormitories, commercial/residential unit etc.).

Measures shall be put into place to ensure the separate collection of the different categories of waste. In particular, staff will be trained and informed on the mechanisms for safe collection of hazardous wastes. All wastes shall be managed by authorized waste operators/handlers and recovered or disposed

of in an environmentally friendly manner. All wastes shall be disposed at appropriate landfill sites, burrow pits or incinerators (if available). Pending collection of hazardous wastes, they shall be temporarily stored in appropriate, safe and secure areas marked with appropriate warning labels. Staff shall be trained for the safe use of such equipment.

6.4.10 Gender, women, children, person with disability/excluded groups' needs

Advancement of gender equality, transforming traditional gender roles and progressive changes in power relationships between women and men are essential to the success of any development initiative. Therefore, BBIN-RTTF phase 1 will ensure that gender inclusiveness as well as chance to benefit as equally as possible from the project interventions. Women's and excluded group's involvement in decision-making should be a genuine and meaningful participation. Because, their development has always been lagging behind due to socio-political discrimination, geographically in disadvantaged position and paternalistic attitude of the state and powerful social actors. Therefore, the sub-projects will give a special attention to creating an enabling environment for women, adolescent girls, children, elderly physically challenged people and excluded groups for their empowerment.

The project will develop separate Gender Action Plan (GAP) with inclusiveness and sensitivity as core guiding principle for all of the sub-components of the project activities. It will recognize existing gender norms, roles and power relations, therefore address gender inequities.

The project seeks to develop the following approaches towards mainstreaming gender and equality with the sub-projects at BLPA/MoS, MoF, MoC and MoRTB and community level for more strategic inclusiveness;

a. Approaches at BLPA/MoS, MoF/MoC/MoRTB level:

- Gender Policy.
- Staffing ratio following existing government policy.
- Equal logistical and capacity building support.
- Internalization of learnings and experiences into policies and practices

b. Approaches at Project level:

- Fixed the gender indicator.
- Gender audit provision.
- Gender training.
- Disaggregated data management system.
- Integrated monitoring system.
- Transparent decision making provision in GRM.

c. Approaches at community level:

- Equal decision making power.
- Equal access to, control over resources & benefits of trade and transport services
- Priority to most vulnerable on resource allocation of services
- Provision of transparency and accountability.
- Mainstreaming women to access and control of trade and transport service benefits.

The project with its inclusive approach will target to reduce gender gaps. More productive and better performing institutions will ensure participation of women over time, which will eventually lead more women to actively take part in trading that are highly male dominated at this point. Reservations for women in every possible area of infrastructure will ensure their safety, hence enabling a women friendly environment.

6.4.11 Occupational Health and Safety (OHS)

OHS plan will be prepared and implemented by each contractor on the basis of the WBG EHS Guidelines, ESCoPs, mitigation plan, and other relevant standards. The Plan will be submitted for review and approval before contractor mobilization. For labor-intensive maintenance works to be carried out by poor people in rural areas, OHS measures outlined in the Labor Management Procedures will be implemented by PIU.

6.4.12 Guideline for preparation of Environmental and Social Monitoring Plan

The monitoring plan is the key element of ESMP to be prepared on the basis of impact assessment described in earlier section. The Plan describes each program activity's potentially negative impacts, lists mitigation and control measures to address the negative impacts, and assigns responsibilities for implementation and monitoring of these measures. The Plans for the all the subproject will be prepared and included in the ESIA. Table 6.6 presents the sample format of these plans. An overview of monitoring requirement of the key environmental and social impacts described in Chapter 5 is given in Table 6.6.

Table 6.1: Format of Monitoring Plan-During Project Implementation Period (Sample)

Environmental Impact/Issue	Actions	Responsibility		Key Performance Indicator	Timing	Cost Allocation
		Execution	Monitoring			
1. Activity: Design / pre-construction considerations of infrastructures						
1.1 Changes in land use, loss of properties, cultivated land and grazing land, relocation of settlements and amenities	-The RAP will be implemented for permanent land acquisition and loss of assets/ livelihood and other similar impacts	Contractor	PIU, PMC	<ul style="list-style-type: none"> • Documentary evidence of RAP implementation • Establishment of resettlement sites • Payment of compensation amounts • People resettling in new villages • Income levels of displaced households • Number of public grievances re resettlement and compensation 	Before construction	Included in Overall program Cost
	-Contractors will lease the land for construction facilities on temporary basis. Proper documentation will be carried out for this leasing. Site selection will be carried out in consultation with the community and local officials; approval from DSM will also be required for the selected sites.	Contractor	PIU, PMC	<ul style="list-style-type: none"> • Documentary evidence of land leasing for temporary facilities • PMC approval for the selected site(s) • Absence of grievances regarding temporary facilities 	Before contractor mobilization	Included in contractors' costs
1.2 Borrowing construction material	- A material (particularly river sand and soil from agricultural land/wetlands, if required) borrowing plan will be prepared	Contractor	PIU, PMC	<ul style="list-style-type: none"> • Approved plan • Plan itself will outline appropriate KPIs for its implementation. 	Before construction	Included in Contractors' costs

Table 6.2: Overview of Impacts, Mitigation and Monitoring Plan

Impacts/Issues	Mitigation Measures	Time Frame	Cost (USD x 10 ⁶)	Responsibility		Key Monitoring Indicators	Monitoring Frequency
				Implementation	Supervision		
ENVIRONMENTAL IMPACTS DUE TO PROJECT SITING							
Land cover and land use changes	Relevant ESCoPs of site selection. Integrated Pest Management Plan; Linkages with ongoing pest management programs	2022-2026	In budget of ESMP	Contractor	PIU, PMC	-to be developed under IPM	Six-monthly
Loss of natural vegetation and trees	Compensatory tree plantation along reconstructed embankment	2022-2026	In budget of ESMP	Contractor	PIU, PMC	-trees cut and trees planted	Monthly
Loss of aquatic habitat	Organic shrimp farming/aquaculture expansion Fish sanctuaries/MPA in BoB	2022-2026	In budget of ESMP	Contractor	PIU, PMC	-abundance of fishes and species diversity in MPA/sanctuaries	Quarterly
Drainage congestion and water logging	Installation of regulators and culverts	2022-2026	Project design	Contractor	PIU, PMC	-User committees are formed and trained; area water logged	Quarterly (Monthly during flood season)
ENVIRONMENT IMPACTS DURING IMPLEMENTATION PERIOD							
Impacts of burrowing of material from river beds, agriculture land and wetlands (if required)	Compliance with relevant ESCoPs of sand extraction, agricultural top soil management and wetland digging	2022-2026	In budget of Contractor	Contractor	PIU, PMC	Sites approved, ongoing visual inspection of sand extraction	At the beginning of works and through sand extraction
Air pollution	Pollution prevention and implementation of ESCoPs	2022-2026	In budget of Contractor	Contractor	PIU, PMC	Plan approved and implemented; community complaints	Quarterly
Noise	Noise control measures and relevant ESCoPs	2022-2026	In budget of Contractor	Contractor	PIU, PMC	Plan approved and implemented; community complaints	Quarterly
Water pollution	Pollution prevention and control plan	2022-2026	In budget of Contractor	Contractor	PIU, PMC	Plan approved and implemented	Quarterly
Soil contamination	Pollution prevention and control plan	2022-2026	In Contractors budget	Contractor	PIU, PMC	Plan approved and implemented	Quarterly

Impacts/Issues	Mitigation Measures	Time Frame	Cost (USD x 10 ⁶)	Responsibility		Key Monitoring Indicators	Monitoring Frequency
				Implementation	Supervision		
Solid wastes and hazardous wastes	Waste management and pollution control plan	2022-2026	In budget of Contractor	Contractor	PIU, PMC	Plan approved and implemented	Quarterly
Impacts on aquatic habitat	Treatment of waste effluents	2022-2026	In budget of Contractor	Contractor	PIU, PMC	Sites approved and ongoing monitoring of plan implementation	Before and during construction
Impacts on wildlife habitats	No construction related activities on sensitive wildlife habitat, use of low wattage lights at construction sites	2022-2026	In budget of ESMP	Contractor	PIU, PMC	Biodiversity monitoring studies	Semi annually
Site clearance and restoration	Site restoration and landscaping	2022-2026	In budget of Contractor	Contractor	PIU, PMC	Sites established and cleared	After construction
Occupational health and safety	Implement health and safety, and emergency response plan	2022-2026	In budget of Contractor	Contractor	PIU, PMC	Plan prepared and implemented	Quarterly
ENVIRONMENTAL IMPACTS DURING POST PROJECT PERIOD							
Generation of solid waste	Implementation of Health Safety Environment Plan	2022-2026	IA's annual budget	IA	IA	Plan prepared and implemented	Semi annually
Air and noise pollution	Air and noise quality and appropriate measures	2022-2026	IA's annual budget	IA	IA	to be developed	Quarterly
Water pollution	Organic aquaculture, water treatment, etc.	2022-2026	IA's annual budget	IA	IA	to be developed	Quarterly

6.4.13 Monitoring Program

As one of the key elements of the ESMP, a three-tier monitoring program is proposed comprising compliance monitoring, effects monitoring, and external 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 effectively and evaluate program impacts on the key environment parameters. Various types of ESMP monitoring are discussed below.

6.4.13.1 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 PMC with the help of checklists to be prepared on the basis of the Mitigation Plan.

6.4.13.2 Effects Monitoring During Project Implementation

Effects monitoring is a very important aspect of environmental and social risk management. The monitoring plan proposed for the project is presented in Table 6.2. After the preparation of the site-specific ESIA, this program will be revisited and revised. 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.

Table 6.2: Effects Monitoring Plan

Parameter / Activity	Location	Means of Monitoring	Frequency	Responsible Agency	
				Implemented By	Supervised By
During Project Implementation					
Sand extraction/soil collection	At all sand extraction points	Ecological inspection of the site prior to development; and extraction carried out not in long stretches	Weekly	Contractor	PIU
Soil Pollution	Construction site, camp & RS	Visual inspection that filling is through several compartments	Beginning of earth filling works	Contractor	PIU
	Construction, RS and material storage sites	Ensure no contaminated effluent is leaving from the filling area to the nearby agricultural lands	Weekly	Contractor	PIU
Hydrocarbon and chemical storage	Construction camps and yards	Visual Inspection of storage facilities	Monthly	Contractor	PIU
Traffic Safety	Construction Access Roads	Visual inspection to see whether proper traffic signs are placed and flag-men for traffic	Monthly	Contractor	PIU

Parameter / Activity	Location	Means of Monitoring	Frequency	Responsible Agency	
				Implemented By	Supervised By
		management are engaged			
Air Quality (dust, smoke)	Construction sites	Visual inspection to ensure good standard equipment is in use and dust suppression measures (e.g., spraying of waters) are in place.	Daily	Contractor	PIU
	Material storage sites	Visual inspection to ensure dust suppression work plan is being implemented	Monthly	Contractor	PIU
Air quality	Sensitive receptors along construction corridor	24 hours continuous monitoring with the help of appropriate instruments and analyzers (particulate matter, carbon dioxide, sulphur and nitrogen oxides)	Quarterly	Contractor	PIU
Noise	Construction sites	Noise measurement using noise meter; Ensure work restriction between 21:00-06:00 close to the sensitive locations	Weekly	Contractor	PIU
Surface Water Quality	At the baseline monitoring sites	Sampling and analysis of surface water quality (TDS, Turbidity, pH, dissolved oxygen, biological and chemical oxygen demand)	Quarterly	Contractor through a nationally recognized laboratory	PIU
Groundwater quality	Locations of tube-well installation (for workers camps and RS), Other buildings	Depth of tube well should be more than 30m. Test water for arsenic iron and manganese before installing of casing. If the quality is found not suitable further	During drilling of wells	Contractor through a nationally recognized laboratory	PIU

Parameter / Activity	Location	Means of Monitoring	Frequency	Responsible Agency	
				Implemented By	Supervised By
		deepening will be done.			
	Water wells to be used by contractors for drinking	Laboratory analysis of all drinking water parameters specified in national standards	After development of wells	Contractor through a nationally recognized laboratory	PIU
Plantation	Building construction sites, affected vegetation sites	Visual inspection to ensure plantations are taken care of.	Monthly	Contractor	PIU
Waste Management	Construction camps and construction sites, other infrastructure sites, laboratory, etc.	Visual inspection that solid waste is disposed at designated site	Monthly	Contractor	PIU
Drinking water and sanitation	Construction camps and construction sites, other infrastructure sites, laboratory, etc.	Ensure the construction workers are provided with safe water and sanitation facilities in the site by checking drinking water quality	Weekly	Contractor	PIU
Flora and Fauna	Sensitive habitats in Project influence area	Survey and comparison with baseline environment Ensure use of lighting at construction sites conforms with requirements to limit impacts to wildlife	Six-monthly	Biodiversity Conservation and Monitoring Consultant	PIU
Restoration of Work Sites	All Work Sites	Visual Inspection	After completion of all works	Contractor	PIU
Safety of workers Monitoring and reporting accidents	At work sites	Usage of Personal Protective equipment and implementation of contractor OHS plan	Monthly	Contractor	PIU
Grievances (environmental issues)	In the project area	Number of grievances registered and addressed	Monthly	PIU	PIU
During Operation and Maintenance Period					
Stability of protection works	Resettlement Sites (if any)	Visual inspection of erosion prevention	Monthly	PIU/BBIN- RTTF1	PIU

Parameter / Activity	Location	Means of Monitoring	Frequency	Responsible Agency	
				Implemented By	Supervised By
		measures and occurrence of erosion			
Plantation	Construction sites, etc.	Visual inspection to ensure plantations are taken care of.	Monthly	Contractor	PIU
Waste effluents	Construction camps and construction sites, other infrastructure sites, laboratory, etc.	Visual inspection that solid and liquid waste effluents are properly managed during post project period	Six-monthly	EMU of PIU/BBIN- RTTF1	PIU

6.4.13.3 Third Party Monitoring

PIU will engage an independent consulting firm to conduct external and independent monitoring of the ESIA and ESMP implementation will be conducted on quarterly basis. The main purpose of the external monitoring will be to ensure that all the key entities including MOC, BLPA, RHD, NBR, PMC and contractors are effectively and adequately fulfilling their designated role for ESMP implementation, and that all the ESMP requirements are being implemented in a timely and effective manner. The ToR of the external monitoring will be presented in the respective ESIA reports. Third party monitoring will be hired for RHD and port authority works and other monitoring activities for other IAs, the monitoring will be performed by inhouse consultants of those IA agencies (MoC and NBR).

6.4.13.4 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. Project Supervision Consultant (PSC) will be responsible for compiling the information on these indicators and report to PIU.

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

- Number of inspections carried out by PSC per month.
- Number of non-compliances observed by PSC.
- Availability of environmental specialists in PIU.
- Availability of environmental specialists in PIU.
- 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 affected.
- Timely implementation of resettlement schedule.
- Number of grievances received.
- Number of grievances resolved.
- Number of constructions related accidents.

6.4.13.5 ESMP Implementation Cost

Cost estimates will need to be prepared for all the mitigation and monitoring measures to be proposed in the specific ESIA in accordance with the ESMF. The cost estimates for some of the mitigation

measures identified in the ESMP will be part of the civil works contract. Some of the suggested activities from ESIA will be implemented by hiring NGO/consulting firm for some specific IAs. Land Acquisition cost is excluded and the budget will come from client's own resources. The following budget is the sum of the cost that would be incurred for ES personnel of the PIUs, ES training and capacity building, ESMP implementation, ES monitoring, Communications (materials and campaign), OHS Materials (e.g., Mask/ Disinfectant Spray/ Handwash etc.), etc. Human resource cost for recruitment of ES personnel to provide implementation support, monitoring and supervision and cost for all the mitigation and monitoring measures including reimbursables (such as travels, communication, ESIA studies, OHS materials, monitoring and reporting) will be finalized after the completion of the sub-project ESIA's. The necessary budgetary provision for implementation of ESMF/ESMP should be made in the DPP by the PIUs.

The Development Project Proposal (DPP)/Technical Assistance Project Proposal (TAPP) of BLPA/NBR/MoC/RHD for the proposed program should reflect the ESMP activities with budget for successful environmental and social management of the program. Total US\$ 1.13 million is estimated for implementation of ESMF which should be embedded in the proposed total project budget from IDA.

7. STAKEHOLDER ENGAGEMENT, GRIEVANCE MECHANISM AND DISCLOSURE

7.1 Stakeholder Engagement, GRM and Information Disclosure

Stakeholder consultation is a crucial element, particularly to solicit, collect and document the opinions of project affected people and interested parties to ensure that project design reflects the stakeholders' collective views. A detail Stakeholder Engagement Plan will be prepared by the appraisal and followed out throughout the project life cycle and will be the main guiding document for the project. The SEP identifies the "project affected parties", "other interested parties" and the "vulnerable and disadvantaged groups" specific to all 4 IAs (BLPA, NBR, MOC and RHD) of the project and includes the relevant provisions to engage all the stakeholders from the inception to the project to all through the project cycle, till completion and post-construction/operational phase. The SEP will be considered as living document and will be revised as necessary if the project context requires so with clearance from the Bank. The SEP will elaborate a project-specific GRM for all the 4 IAs. The following sections are summarizing the ESMF requirements for stakeholder's consultations and disclosures.

7.2 Objectives of the Consultations

The World Bank's Environmental and Social Framework (ESF) underscores the importance of open and transparent engagement between the borrower and project stakeholders as an important pillar of good practice. Effective stakeholder engagement through a robust consultation and disclosure mechanism promotes environmental and social sustainability of the project, enhances its acceptance, makes important contributions to design, and aids in smooth implementation of the project. Stakeholder engagement is an inclusive process and is carried out throughout the project's life cycle. ESS10 refers to Stakeholder Engagement and Information disclosure requirements of the ESF. The following are the objectives of ESS10:

- Establish a systematic approach to stakeholder engagement that will enable borrowers to identify and form constructive relationships with the relevant stakeholders, including Project Affected People (PAP).
- To assess the level of interest and support stakeholders have for the project and ensure that through this mechanism, the views of the stakeholders are incorporated into the project design.
- Encourage and facilitate methods of effective, meaningful consultation and engagement with PAPs throughout the project cycle on issues that could potentially have an impact on them
- Ensure that project information related to environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

ESS10 promotes meaningful consultation and communication with all stakeholders, and the process of stakeholder engagement involves the design and implementation of a Stakeholder Engagement Plan (SEP). The SEP covers the following aspects:

- (i) Stakeholder identification and analysis;
- (ii) planning how stakeholder engagement will take place;
- (iii) disclosure of information;
- (iv) consultation with stakeholders;
- (v) consultation with stakeholders;
- (vi) addressing and responding to grievances;
- (vii) reporting to stakeholders.

The SEP for BBIN MPA program has been prepared. The coordination and monitoring mechanisms established in the SEP are overseen by committees comprising of staff from BLPA, MoC, NBR, RHD. As part of the process, five FGDs and three stakeholder consultation meetings were conducted on different days and locations, and the participants included officials from port authority of Burimari,

Patgram, Chattogram Custom House, local importers, community representatives, female laborers and entrepreneurs, local traders and truck labor association representative. During the consultation the people were informed about:

- A background of the program and sub-projects
- Likely E&S impacts and risks and proposed mitigation measures
- The ESF of World Bank
- Other possible impacts, risks, benefits and opportunity associated with the program.

The Consultations elicited from the participants the following:

- Grievance Redress Mechanism (GRM)
- Their views on the project especially the likely adverse E&S impacts and risks;
- Possible mitigation measures in case of adverse impacts and risks;
- Means to better delivery of compensation and assistance, and benefit from potential opportunities (e.g., temporary / permanent employment, traffic safety measures);
- The assurance from the project authority not to marginalize people by depriving them from their livelihood.
- Provision of infrastructure related to safety.

Through public participation, stakeholder's viewpoints and suggestions were captured as an input to the technical design, which were duly considered, and all the suggestions were incorporated in the project design to the extent feasible and /or warranted.

7.3 Methodology and Tools of the Consultation

The consultation and participation process in preparing and disclosing the ESMF was limited to three public consultation meeting and five FGDs. 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 sub-projects level once they are identified and will be more inclusive irrespective of gender, profession, religion and age groups. The various tools identified in the SEP will be used for consultations including household level interviews, participatory rural appraisal, FGDs, stakeholders' consultation meetings, issue specific consultation meetings, open meetings, and workshops at both local and national levels. During preparation of RPF, consultation meetings and workshops with different stakeholders at the initial stage and a disclosure workshop to share findings of the draft ESMF at the later stage of project preparation will be conducted. The discussion, concerns and responses are extensively documented in SEP. A summary of consultation meetings is given below:

Table 7.1: Summary of Consultation Meetings and FGDs

Date	Name of the IA	Meeting & Place	Participants (Male)	Participants (Female)	Total
10 December 2021	BLPA	FGD at Burimari Land Port with local community (Zero Point) (males only)	13	-	13
11 December 2021	BLPA	FGD at Conference Hall, Burimari Land Port with Importers and C&F Agents	10	-	10
11 December 2021	BLPA	FGD at Tatipara, Burimari Land Port with Community Elite Persons	10	-	10
11 December 2021	BLPA	FGD at Burimari Bazar with Truck Labor Association	07	-	07
11 December 2021	BLPA	FGD at Burimari Land Port with local community (Zero Point) (females only)	-	13	13
13 December 2021	BLPA	Consultation Meeting with stakeholders at Burimari Land Port	39	01	40
9 December, 2021	NBR	Online (Zoom); Consultations with the participants from IAs (focal person),	24	04	28

Date	Name of the IA	Meeting & Place	Participants (Male)	Participants (Female)	Total
		government officials based in Dhaka Headquarters of relevant departments.			
20 December, 2021	NBR	Conference Room, Custom House, Chattogram; Local level consultation with the participants of district level government officials of NBR, representatives of C&F Association, and representatives of Chattogram Women Chamber and Commerce.	18	04	22

A detail discussions with photographs and participants list are presented in Annex B and C respectively.

7.4 Outcomes of consultation meetings

During preparation of the ESMF, BLPA and NBR have engaged with the stakeholders and collected their opinion and those are incorporated with the entitlement matrix preparation. A summary of consultation outcomes and disclosure workshop is given below. The following table summarizes the stakeholder consultation outcomes of Chattogram Customs House:

Table 7.2: Summary of Stakeholder Consultation Meeting (NBR)

Issues	Discussion
Environmental Risks and Management	<p>Due to the nature and size of the project, the participants were more interested to discuss on the infrastructural design and environmental aspects of the project. Followings are some key environmental factors that were identified and asked to take into consideration during implementation of the project:</p> <ul style="list-style-type: none"> • Air and Noise pollution would be one of the vital issues, particularly during the period when the existing building would be demolished to build new ones. There should be a proper plan in place to minimize air and noise pollution during the implementation period. • One of the major environmental risks is air pollution from the vehicles. It is seen that vehicles have to wait in a long que at the existing VICs and gas emission from the vehicles is a concern of air pollution. Noise level is also higher around the VICs which creates nuisance to the local environment (From SCM with RHD). • Another concern was on the species of trees planted in road sides. Though it is known that some exotic species like eucalyptus, acacia are not good for our environment but the arboriculture department of RHD is planting those species along the highways; for an example the Rajshahi-Naogaon highway (From SCM with RHD). • Custom House, Chattogram discard huge amount of paper every day. They usually store those papers in a warehouse and then sell those off later. During the site visit, the World Bank team observed a huge amount of waste paper stored in the corners of the balconies those are waiting to get disposed in the proper way. However, a paper recycling center or/and waste treatment plant can be considered to build so that they can dispose them immediately to maintain a clean working environment. • Sound pollution management system in the new buildings; this needs to take into consideration by installing sound proof windows and other ventilation systems. • The Custom House, Chattogram has a decent number of trees inside their compound. During the implementation of the project, need to minimize the number of trees will be cut down. • Custom House, Chattogram chemical laboratory is one of the crucial laboratories in the country, where 90% of the chemicals are tested that are imported in Bangladesh. The lab is severely understaffed (it has only 4 people and among them 3 are assistants) and the lab technically operates only in two rooms. The ESMF should propose a "Hazardous Material Management Plan" before implementation of the project. The HCMP should clearly mention probations on how to transfer the chemicals from one place to another. • Water logging during the rainy season: Custom Excise and VAT Training Academy goes under water during the rainy season. This temporary yet hazardous problem makes lives miserable for the people who live and work in that area.

Issues	Discussion
	<ul style="list-style-type: none"> • Custom Excise and VAT Training Academy (CEVTA) produces significant amount of waste every day and the representative of the CEVTA suggested a waste treatment plant in their compound to keep the environment clean and safe on a regular basis. • Drainage system: Proper drainage system is important to keep the area clean and safe for all. While designing and panning for this system, need to consider sustainability issues, like capacity and proper management in mind. • Rooftop Management: Green rooftop management can be considered to increase the aesthetic aspect of the building. Also, plantation, proper sitting area for small meetings, well managed open area for different activities can be considered within the design which can potentially benefit everyone.
Social Risks and Management	<ul style="list-style-type: none"> • Sometimes there are accidents and even fatalities during construction. Proper measures have to be taken to avoid these kinds of incidents. • Temporary resettlement of the NBR employees/workers living in the compound of both sites; proper compensation and related issues has to be considered with utmost care. There are no squatters/informal occupants at both sites. • People visiting Custom House, Chattogram mostly have their lunch in the compound in an existing canteen. During the reconstruction of the compound, the canteen will not be there and that may create some inconveniences for the people visiting Custom House. An alternative of this system needs to be considered during the implementation. • Mosquitoes and pesticides control measures; mostly forgotten but one of the crucial issues since serious health issues like dengue, chikungunya, etc. are associated with this. • Traffic congestion: During the construction period, the amount of usable land will be reduced, hence creating traffic congestion inside the compound. An alternative plan needs to put in place to minimize the congestion.
Infrastructural Design Related Feedback for Custom House, Chattogram	<p>Everyday around 2000 people come visit Custom House, Chattogram and the number of incoming people will go up in next decades, given the growth trajectory of Bangladesh. Hence, the design of the building has to be foresightful and it is important that the building is designed in a way that would be sustainable with green engineering design, remain relevant to time, and most importantly, can accommodate any changes in demand of time.</p> <ul style="list-style-type: none"> • The new buildings need to be built in a way that they have enough probation to use daylight during the day time as a source of light. Enough open space and green building need to take into consideration to minimize the use of Air Conditioner. • The buildings need to have wide stair case to manage fire hazard; and the lift and stair can't be side by side. • The building must have an emergency exit and the staircase of the exit has to be wide enough to accommodate enough people at a time during fire or any other disaster. • The building must have a separate prayer room and washroom for ladies. Also, a separate rest room for child care or can be used as a rest room. • The building must have two to three seminar halls of different capacity and an auditorium. Also, the present stakeholders suggested considering a gym/yoga center, a library and dining halls as of needs. • The building must have three to four lifts and each lift should have a capacity to lift 20 people or more. • Proper parking space is of high importance and it has to be properly managed to accommodate all incoming vehicles. • The compound must have proper toilet facilities outside for the visitors.
Planning and Operational Management	<ul style="list-style-type: none"> • During the project implementation, there will be temporary arrangement for issues, like resettlements, labor sheds, server reinstallation, and many more. It needs to make sure that the temporary operational issues are smooth and not interrupting the daily activities. • Custom House, Chattogram server reinstallation is supremely important; sincere attention is needed here during implementation • The existing Custom House building will not be broken initially; the rest of the complex will be rebuilt first and then the official activities will be moved to those new buildings temporarily. • There is a grave, that has to be preserved. • NBR needs to apply to the forest department for clearance for cutting down the trees of the compound.

Issues	Discussion
Suggestions (Not related to ES)	<ul style="list-style-type: none"> Alternative connecting road from Bangladesh to Agartala: People living in Agartala need 36 hours to reach Kolkata, whereas they can reach to the nearest Bangladesh districts within 3-4 hours. There is a huge untapped trade potential for both counties in that area. An alternative smooth road connectivity can ease the process and can facilitate trading in that area. Custom House and port connectivity: To mitigate traffic congestion, an underpass connecting the Custom House and Port would be helpful.

The following table summarizes the stakeholder consultation outcomes of BLPA; the meeting was conducted at Burimari Land Port.

Table 7.3: Summary of Stakeholder Consultation Meeting (BLPA)

SI	Key Issues Raised	Participant/S Type	Response
1	Brief on the project	AD, Burimari Land Port	The AD of Burimari Land Port welcomed and thanked all the participants for their presence in the public consultation meeting. Then he gave a brief on the project.
		Environmental and Social consultants	The consultants discussed to the participants what environmental and social standards will be maintained throughout the project like, preparing separate documents on Environmental and Social Management Framework (ESMF), Environmental and Social Impact Assessment (ESIA), Stakeholder Engagement Plan (SEP), Labor Management Procedure (LMP), Resettlement Policy Framework (RPF), Resettlement Action Plan (RAP), Sexual Exploitation & Abuse and Sexual Harassment (SEA/SH), Gender Action Plan (GAP), Environmental and Social Commitment Plan (ESCP)
		Company Commander, Border Guard Bangladesh (BGB)	The BGB company commander then said that his organization would try to provide all possible assistance in implementing the project.
2	How the price is determined in case of land acquisition?	AD, Burimari Land Port	Social consultants firstly said that, for the development or expansion of the existing land port, according to the World Bank's Environmental and Social Framework (ESF) the project Implementing Agency's primary target is to avoid any kind of private property/ land acquisition. If it is not avoidable then the project will go following the Resettlement Policy Framework and Resettlement Action Plan for land acquisition where policy from both the Government of Bangladesh and The World Bank will be followed. It was also discussed that, to determine the price of land or any kind of loss (e.g., structures, crops, tress, business etc.) there will be Property Valuation/Market Survey.
		Mr. Sayed, President, C&F Agents Union	He said that, if possible, there would be about 25 acres of vacant land on the east side of the present port. That space can be acquired and used for project work.
3	If someone runs a floating business on other's land or Government-owned land (Khas) and if that business is affected, how will that person be paid compensation?	Md. Anwar Hossain (In-Charge, Immigration Police, Burimari land port)	Answering the question raised by the Immigration Police consultants discussed in the meeting that any business, whether small, medium or large, permanent or temporary, would be compensated if affected by the project. The participant also wanted to know, if land acquisition takes place, compensation will be determined for the lands on the front side of the road and that are away from the main road. Consultants informed that by evaluating the market survey and government rate land price, all affected person/s should get a fair price for their land parcel.
4	If land acquisition takes place what will the community living very close to the land port do	From representatives that are living in the proposed land area adjacent to the existing land port (near zero point)	Consultants assured them again that if land acquisition is unavoidable, then the project will follow the RAP and accordingly affected persons will be compensated and provided support for their resettlement.

SI	Key Issues Raised	Participant/S Type	Response
5	Education system and children's security	Mst. Rahena Sultana, Head Teacher of primary school, and Community representatives	<p>Stone is the most important of the various products imported through this land port. The stone crushing business around this port area is currently making a huge contribution to the economy of Burimari. But due to the business of stone crushing, stone powder, etc., the environment has become much polluted in the area around 5/8 km near Burimari port. All the citizens living here are moving in a dusty and sandy environment. As a result, people are suffering from shortness of breath, asthma, cold and cough. The headmistress drew the attention of the authorities to keep in mind reducing the environmental pollution by expanding and modernizing the port area.</p> <p>The participants agreed with what she said and they suggested Participants suggested that a particular area with boundary be set up in an uninhabited area for the stone related businesses and that the companies regularly set up sprinklers on their behalf and abide by those rules.</p> <p>Nearly one third of the participant said that the education system in this area is poor. In addition, it is plagued with various problems due to which number of school dropout is also high.</p> <p>More than 15 primary school is located in this area contrarily only 1 high school and 1 college which is 6 kilometers away from this area.</p> <p>The Head Teacher again said, 'A country is bigger than the individual'. Therefore, in the interest of development of the country, we have to take any kind of action positively. But the project will be implemented by giving priority to the 6 basic needs of the people - that is what they hope. Burimari is not as green as before. All the trees in the area are now covered in dust. If the Ministry of Environment initiates a tree planting program here, it is very good for the area.</p> <p>Excessive load-shedding has resulted in students not being able to study properly.</p>
6	Labor related issues	Mst. Rahena Sultana, Head Teacher of primary school	<p>All workers who come to the area to work on the project must ensure that they are provided with the Covid-19 vaccine.</p> <p>The use of gloves, helmets, boots, etc. should be ensured to avoid the risk of accidents and safety of those who will work as laborers.</p>
		President, Landport labor union	About 3000 workers are involved in various activities of the port. They do not have restrooms, toilets, overnight accommodation etc. in the port area.
		Mr. Sayed, President, C&F Agents Union	There is no accommodation for the drivers of freight vehicles arriving in the port area. Most of the incoming drivers spend the night in freight cars or trucks. Which is very risky for them to do their job properly. So accommodation needs to be arranged for them.
7	Communication facilities	All Participants	<p>Getting students to school is challenging as they have to sit in traffic jams for a long time almost every day.</p> <p>In addition, Heavy mud in rainy days and extensive dust in normal times creates a tremendous suffering to the school-college going children.</p> <p>Furthermore, road accident happens very often there, driving of over loaded trucks in less width road is responsible for accidents.</p> <p>Accidents often happen because of narrow roads, broken roads. In addition, dust, severe traffic congestion has made communication in this area difficult.</p> <p>Communication will be much easier if a bypass road can be made from Burimari Land port zero point aligning with the rail way line. Undoubtedly it will be a tremendous support for local residence.</p>
		Mr. Sayed, President, C&F Agents Union	The highway that started from Burimari Zero Point area and passed through Burimari Bazar towards Patgram is quite narrow considering the number of vehicles currently plying in the area. This road needs to be at least 6 lanes. This will almost completely alleviate the severe traffic congestion in the area.
		Company Commander, Border Guard Bangladesh (BGB)	He said if the port is developed, the country will develop. First, the allocation of BGB's security needs to be expanded. The existing highways need to be widened. A separate walkway has to be built for people to walk. In this project, all the infrastructural development has to be done considering Burimari port, but infrastructural development has to be done keeping in view the common man.
8	Health system of this area	All Participants	Nearly all the participants said that the health system of this area is terrible. Community clinic, upazila health complex, even in Sadar hospital don't have

SI	Key Issues Raised	Participant/S Type	Response
			<p>sufficient medical facility, and nowadays they don't even expect to get adequate service.</p> <p>Consequently, critical patients are taken to rangpur medical where they get proper treatment.</p> <p>At least 70 people in this area have died of silicosis due to excessive air pollution, and 100 more people are still infected.</p> <p>A large number of residences of this area suffer from Asthma, silicosis, shortness of breath and other critical diseases due to open stone crushing miles.</p>
9	Environmental awareness of stone crushing company	All Participants	<p>Majority of the participants blame 'Stone traders' for environmental pollution as crushing rocks in the open air, the dust of the rock spreads in the air and pollutes the air.</p> <p>After being washed by rain water, this dust goes into rivers or reservoirs and causes water pollution.</p> <p>As there is a possibility of air pollution by the project, the authority should take necessary steps to reduce the environmental pollution.</p> <p>Wastes of this project should be kept or managed away from localities.</p> <p>If the stone crushing traders water regularly, the dust will be reduced in this area.</p> <p>Regular monitoring by law enforcement agencies will reduce such irregularities.</p>
		Mr. Sayed, President, C&F Agents Union	<p>At present, the volume of Burimari land port-centric business has increased many times over. The area of Burimari land port is presently approximately 11 acres. Even if the size of the port is increased 10 times more than it is now, it will not be enough to run port-based businesses.</p> <p>Neither the traders nor the appropriate authorities are responsible for reducing the environmental pollution by the stone business. The stone workers are risking their lives to earn a living. The stone business is one of the major contributors to the region's economy. According to the government policy, all the stone crushing businesses are supposed to operate within 3 km of the port area, but at present the stone business establishments are spread over an area of about 8 km. Therefore, administrative monitoring is very important for sustaining the business and keeping the environment safe.</p>
10	Development of Land Port Immigration related issues and other facilities	Md. Anwar Hossain (In-Charge, Immigration Police, Burimari land port)	<p>The current situation of rest, toilets, food intake for our immigrant passengers is very inadequate compared to other countries in the international arena. Since they have to face immigration first by crossing the border from a neighboring country, their first impression of our country will be positive once immigration meets international standards. So, we want a tidy, tidy, clean immigration.</p>
11	What should be kept in mind for this project?	All Participants	<p>There are no residence facilities for drivers and staff from India or other countries, and even there are no toilet or bathing facilities. These issues must be kept in mind planning this project.</p> <p>A mosque should be built within port boundary so that workers can pray in time properly.</p> <p>To reduce road accident a foot over bridge needs to be installed in the land port area.</p> <p>The labors are often victims of accidents. Contrarily, there is no insurance facilities for them. There should be an insurance facility so that they can get support from.</p>

7.5 Consultations and Communication Framework

Consultations with the key stakeholders will need to be carried out throughout the program life. These will include consultations and liaison with communities and other stakeholders during the project implementation and also extensive consultations with the local people as well as institutional stakeholders during the ESA studies. The framework for the future consultations is presented in Table 7.4.

Table 7.4: Future Consultation Framework

Description	Objective/Purpose	Responsibility	Timing	Frequency
Consultations with communities and	Sharing ESIA ToR	PIUs and ESA team	During scoping stage of ESA	Consultation Meeting at all

Description	Objective/Purpose	Responsibility	Timing	Frequency
other stakeholders during ESA study				Districts and Urban areas
	Dissemination of information on program and its key impacts and proposed mitigation measures; soliciting views, comments, concerns, and recommendations of stakeholders	PIUs and ESA team	During ESA study (once draft analysis is available for discussion and feedback) before submission to DoE for clearance	Consultation Meeting at all Districts and Urban areas; National Stakeholders Consultation.
Consultations with communities and other stakeholders during project implementation	Information dissemination; public relation; confidence building; awareness about risks and impacts; minimizing conflicts and frictions.	PIUs; Contractors; PMC	During Project Implementation	Project Specific Location of interventions and impacted areas.
Consultations with communities during project operation	Liaison with communities and program beneficiaries	IAs	Post Project Period	As and when necessary

7.5.1 Community Engagement and Stakeholders Participation (ESS10)

A detailed standalone Stakeholders Engagement Plan (SEP) will be prepared and disclose following the ESS 10 requirements.

7.5.2 Gender Analysis Procedures and Guidelines (ESS 1, 2, 4, 5, 7)

The project would address gender issues through approaches that are participatory and responsive to the needs of the poor, particularly when it involves management of public works sites. However, a separate standalone Gender Action Plan (GAP) will be prepared and disclosed to address the ESS requirements.

7.6 Grievance Redress Mechanism

The project will establish a grievance redress mechanism (GRM) for addressing grievances and complaints received from the project affected persons due to environmental issues. The GRM will be two tiers; site level and PMU level. The GRMs will also be equipped to receive labor and SEA/SH related GRM. The GRM is a valuable tool which will allows affected people to voice concerns regarding environmental and social impacts for the project activities. The proposed project will ensure that grievance redress procedures are in place and that all project actors and beneficiaries are informed of the processes involved in filing a complaint. The project would monitor those procedures to ensure that grievances are handled properly. The project 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.

7.6.1 Overview and Scope

The project will establish and will follow a GRM for answering queries, receiving suggestions and addressing complaints and grievances likely to raise in the project cycle including identification, planning, design and implementation. The GRM spans the entire implementation period and will cater to both the beneficiary communities and the directly and indirectly affected population including the staff, beneficiaries and other stakeholders. Though the GRM proposed here a mechanism of redress has been designed to address environmental and social problems identified during implementation, it will

also cater to manage any disconnects that emerge from the site level and that has significant implications for effective implementation of the project interventions.

7.6.2 Objectives of Grievance Redress Mechanism

The fundamental objective of GRM will be to resolve any project related grievances locally in consultation with the aggrieved party to facilitate smooth implementation of the social and environmental action plans. Another important objective is to democratize the development process at the local level and to establish accountability to the affected people. The procedures will however not a person's right to go to the courts of law pre-empt.

The GRM will be consistent with the requirements of the World Bank policies to ensure mitigation of community concerns, risk management, and maximization of environmental and social benefits. The overall objective of the GRM is therefore to provide a robust system of procedures and processes that provides for transparent and rapid resolution of concerns and complaints identified at the local level. The GRM will be accessible to diverse members of the community, including women, senior citizens and other vulnerable groups. Culturally-appropriate communication mechanisms will be used at all project sites both to spread awareness regarding the GRM process as well as complaints management. Where project intervention areas cover beneficiaries from the small ethnic communities, project GRM will integrate traditional grievance management system available with the small ethnic communities and the Grievance Redress Committee (GRC) will include a representative from these communities.

In any working environment, both employers and employees need to be fully conversant with all aspects of disciplinary processes, the grievance handling procedures and the legal requirements and rights involved. In implementing an effective dispute management system consideration must be given to the disputes resulting from the following:

1. Disciplinary action
2. Individual grievances
3. Collective grievances and negotiation of collective grievances
4. Gender-based violence, sexual exploitation and workplace sexual harassment

7.6.3 Grievance Redress Mechanism

Information about the GRM will be publicized as part of the initial disclosure consultations in the participating subproject areas. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project offices, village notice boards, community centres, etc. Information about the GRM will also be posted online on the respective IA's website (MOC: <https://mincom.gov.bd/>; RHD: <https://rhd.portal.gov.bd/>; BLPA: <http://www.bsbk.gov.bd/>; NBR: <https://nbr.gov.bd/>).

The overall process for the GRM will include six steps as described below. This GRM process structure is the combined output of all the IAs.

- **Step 1: Uptake.** Project stakeholders will be able to provide feedback and report complaints through several channels: in person at offices (village/mahalla, Union, project, and Upazila offices) and at project sites, and by mail, telephone, and email.
- **Step 2: Sorting and processing.** Complaints and feedback will be compiled by the Assistant Manager/Social Development Officer and recorded in a register. Submissions related to the resettlement and compensation program will be referred to the planning department for processing and resolution.
- **Step 3: Acknowledgement and follow-up.** Within seven (7) days of the date a complaint is submitted, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint.

- **Step 4: Verification, investigation and action.** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and resolve the complaints following the Figure 7.1. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.
- **Step 5: Monitoring and evaluation.** Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. This will be accomplished by maintaining the grievance register and records of all steps taken to resolve grievances or otherwise respond to feedback and questions. Typical grievance resolution process is shown on Figure 7.1.
- **Step 6: Providing Feedback.** This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. On a monthly basis, the Planning Department will report to the Executive Chairman on grievances resolved since the previous report and on grievances that remain unresolved, with an explanation as to steps to be taken to resolve grievances that have not been resolved within 30 days.

Any GBV related complaints will be handled in a survivor-centric manner in line with the World Bank guidelines provided in the WB good practice note on GBV. GBV-related complaints will be dealt with strict confidentiality, based on the wishes of the GBV-survivor. Any GBV-survivor will be referred to an NGO assigned for the project by the Borrower to manage and respond to GBV cases. This NGO will support GBV survivors in accessing service providers and guiding them through options of lodging a complaint. Process of grievance resolution is presented in Figure 7.1.

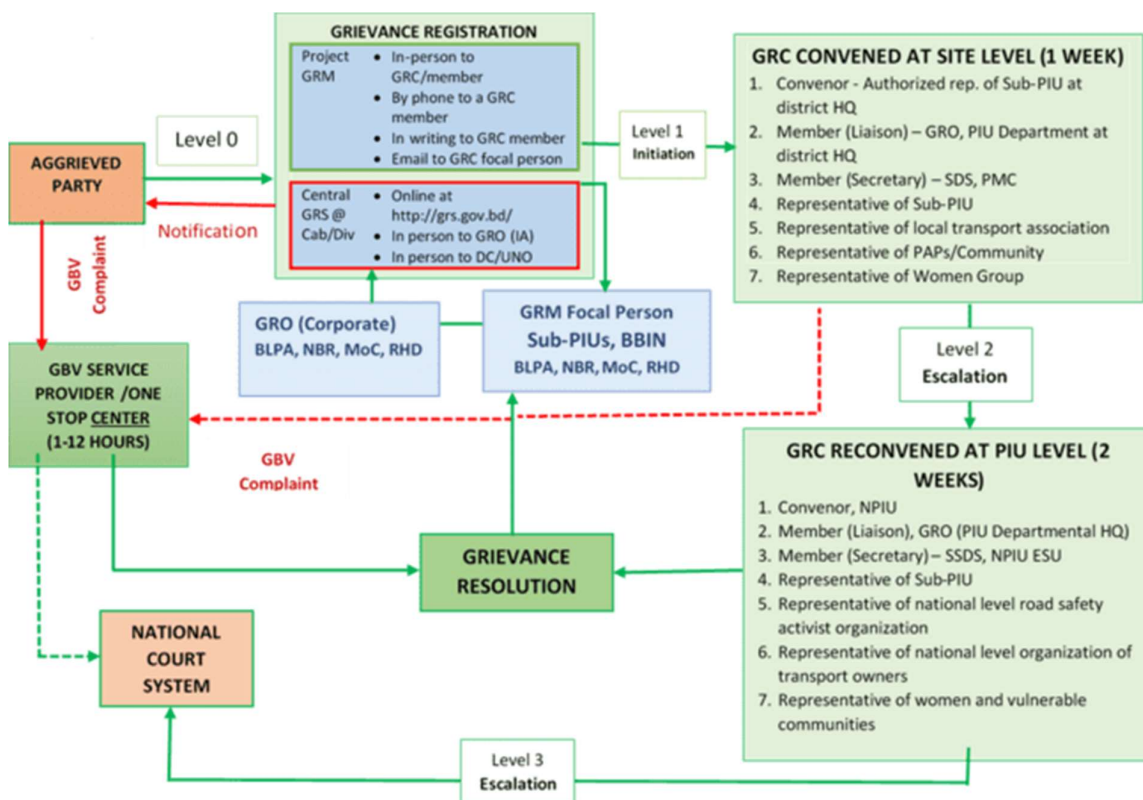


Figure 7.1: Grievance Resolution Process

7.6.3.1 GRM for Dealing with Labour Issues

The GRM with its present scope addresses the grievances/ complaints lodged by the project affected persons and other local stakeholders. But according to the lessons learned in various project contexts, there is also an urgent need to establish a GRM to deal exclusively with those that involve workers employed by the Contractors for site development, construction and other activities. Such grievances

may involve wage rates and unpaid overtime works; irregular and partial payments; lack/ inadequacy of living accommodations; lack of clean drinking water and sanitation facilities; lack of medical care in emergencies.

The GRCs dealing with labour grievances/complaints will have members who are directly and indirectly associated with the construction and other works under the individual Contract packages of the project. Each GRC will have 5 members-

- Project Implementing Agency (here MOC, BLPA, RHD, NBR) official who is in charge of all construction and other activities at individual work sites, will act as convener;
- Resident engineer of the Construction Supervision Consultant;
- A male worker representing the workers;
- A female worker representing the workers;
- A PIU official, designated by the Project Director, who is not associated with the construction activities in the field, but a member of the PIU.

7.6.3.2 GRM for Dealing SEA/SH Related Issues

SEA/SH allegations can be reported to the respective personnel using the available project-level GRM channels. The PIU safeguards specialist logs the SEA/SH allegations, acknowledges their receipt, and takes the following mandatory actions-

1. ACTION 1: Complaint Intake and Refer

If the survivor agrees, the Gender Specialist completes the complaints form, leaving out any information that could be used to identify the survivor-

- The substance of the allegation (what the complainant says without being questioned directly)
- If the alleged offender was/is affiliated with the project to the best of the survivor's knowledge (yes/no)
- If the survivor was referred to services, the survivor's age and/or sex (if provided).

If the survivor does not want to provide her consent in writing, she can give her consent verbally. The Gender Specialist connects the survivor to an appropriate Gender Based Violence (GBV) specialist if requested or preferred by the survivor. Even if the survivor's consent is given verbally, it must be documented. If a survivor requests more services, the GBV specialist will be able to refer them to other care providers. The Gender Specialist will keep the survivor updated on the perpetrator's behavior. The Gender Specialist can close the case if the survivor has been referred to the appropriate GBV specialist, has received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to file an official grievance with the employer.

2. ACTION 2: Incident Reporting

The Gender Specialist must immediately report the anonymous SEA/SH incident to the Project Manager, who will then alert the Team Leader (TL). The Gender Specialist should save all complaint forms and other specific information in a secure area. Neither the PIU safeguards specialist nor the Project Manager should ask the survivor for additional information.

Although survivors' consent is not required for GBV incident reporting, the Gender Specialist must provide ongoing feedback to the survivor at many points in time: (1) when the grievance is received; (2) when the matter is referred to the PIU, IA, and WB; (3) when the verification process begins or when it is determined that there is insufficient evidence to proceed; and (4) when the case is closed. The Gender Specialist must immediately report the anonymous SEA/SH incident to the Project Manager, who will then alert the Team Leader (TL). The Gender Specialist should save all complaint forms and other specific information in a secure area. While the SEA/SH is still open, the Gender Specialist and/or Project Manager should keep the TL up to date on the steps made to resolve the situation.

3. ACTION 3: Grievance Verification and Investigation

To identify if a SEA/SH incident was related to the project, it should be verified. A SEA/SH verification committee should be formed by the Gender Specialist, one member of each IA, one member of a local authority, and a contractor representative (if relevant). The Gender Specialist shall report the incident to the SEA/SH Committee within 24 hours of its occurrence. The SEA/SH verification committee will look into the SEA/SH allegation to see if the grievance is likely to be related to the project.

If the SEA/SH claim is proven after the committee review and it is established that it is linked to the project, the verification committee analyzes possible steps to be proposed to the appropriate party—the perpetrator's employer, which might be the PIU or a contractor. Contractors will be asked to take appropriate action by the PIU. The committee informs the perpetrator's employers of the occurrence so that the appropriate remedy/disciplinary action can be taken in accordance with local labor laws and employment contracts.

When a survivor of a SEA/SH incident refuses to cooperate with an investigation, the appropriate steps should be taken to ensure that the survivor is referred to/aware of available services, and that the project mitigation measures are reviewed to see if they are still adequate and appropriate, or if they need to be strengthened.

The PIU Safeguards Specialist should give links to the necessary organizations if the survivor is interested in seeking redress and desires to file an official complaint with the employer. The police and the courts, not the SEA/SH verification committee, are responsible for ensuring proper legal procedure like other types of issues, the Gender Specialist does not conduct investigations, make any announcements, or judge the veracity of an allegation.

7.6.4 World Bank Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by Sub-project interventions may submit complaints to existing project-level GRM or the WB Grievance Redress Service (GRS). Project affected communities and individuals may also submit their complaint to the World Bank's independent Inspection Panel, which determines whether harm occurred, or could occur, because of non-compliance with WB safeguards policies and procedures. Details of the procedures to submit complaints to the WB's corporate GRS, is available in the GRS website: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service> . For information on how to submit complaints to the WB Inspection Panel, please visit www.inspectionpanel.org. Any disclosure instrument on GRM will provide addresses of the GRS and the Inspection Panel.

7.7 Information Disclosure

The mechanism of information dissemination should be simple and be accessible to all. Two of the important means that have been followed until now include briefing material and organization of community consultation sessions. The briefing material (all to be prepared in local language) can be in the form of (a) brochures (including project information, details of entitlements including compensation and assistance to be given to the PAPs; grievance mechanism) that can be kept in the offices of local government (union parishad office) and project office; (b) posters to be displayed at prominent locations and (c) leaflets that can be distributed in the project areas. Consultation meetings should also be organized at regular intervals by the project to acquaint the communities, target group beneficiaries and affected persons of the following:

- Timeline and progress of the project by components;
- Information on beneficiary participation;
- Information of involuntary displacement, compensation and entitlements;
- Information of participation of small ethnic communities;
- Time line for acquisition of land using voluntary donation, direct purchase and any other voluntary approach.

Also, opinion and consensus of the community needs to be sought for livelihood transformation, relocation of any community assets and involuntary resettlement management. Information disclosure procedures are mandated to provide citizen centric information as well as all documentation necessary for addressing any queries. Disclosure of information will enhance governance and accountability specifically with respect to strengthening of monitoring indicators to help the World Bank monitor compliance with the agreements and assess impact on outcomes.

Table 7.5: Disclosure Requirements

Topic	Documents to be Disclosed	Frequency	Where
Environmental and Social Impact Assessment; Resettlement, Rehabilitation and Land requirement	Environmental and Social Management Framework (ESMF), Environmental and Social Impact Assessment (ESIA); Environmental and Social Management Plan; Resettlement Action Plan (RAP).	Once in the entire project cycle. But to remain on the website and other disclosure locations throughout the project period.	World Bank's website; On the website of IA's (NBR, BLPA, RHD and MOC); ESMF will be prepared by borrower and disclosed in the website of the IAs and WB in both English and Bangla language. The site-specific ESIA/ESMP will be prepared prior to the project intervention and disclosed in both Bangla and English languages in the websites of IA's as well as WB. The client would make the ESA Report, ESMP, RAP available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to the stakeholders and PAPs in the following offices: UP Office Municipality Office City Corporation/Councilor Office Public Library if any Project Office
	Resettlement Policy Framework translated in local language	Once in the entire project cycle.	Distributed among Project Affected Persons (PAP)
	Information regarding impacts and their entitlements in local language	Once at the start of the project and as and when demanded by the PAP.	Through one-to-one contact with PAPs. Community consultation List of PAPs with impacts and entitlements to be pasted in the project office and website of IA's (NBR, BLPA, RHD and MOC),
	R&R monthly progress report.	10th day of every month	Website of IA's (NBR, BLPA, RHD and MOC). Hard copy in the project office
	RAP Impact Assessment Report	At midterm and end of the RAP implementation	IA's (NBR, BLPA, RHD and MOC) website in local language.
Small ethnic communities (if any)	Small Ethnic Community Development Framework and Plans	Identification, design and implementation, monitoring and evaluation	IA's (NBR, BLPA, RHD and MOC) websites Hard copies in local language in the following offices: UP Office Municipality Office City Corporation/Councilor Office Public Library if any Project Office

Topic	Documents to be Disclosed	Frequency	Where
			SECs to be informed on one-to-one contact
Public Consultation	Minutes of Formal Public Consultation Meetings	Within two weeks of meeting	On the web sites of IA's (NBR, BLPA, RHD and MOC) Hard copies in local language in the following offices: UP Office Municipality Office City Corporation/Councilor Office Project Office
Grievance redressed process	Proceedings of grievance process/ monitoring reports	Continuous process throughout the project cycle.	On the web sites of IA's (NBR, BLPA, RHD and MOC) Hard copies in local language in the following offices: UP Office Municipality Office City Corporation/Councilor Office Project Office Beneficiaries and affected persons to be informed on one-to-one contact
Beneficiary identification and engagement	Approach and proceedings/long and short list of beneficiaries	Continuous process throughout the project cycle.	On the web sites of IA's (NBR, BLPA, RHD and MOC) Hard copies in local language in the following offices: UP Office Municipality Office City Corporation/Councilor Office Project Office Potential target group beneficiaries to be informed on one-to-one contact

7.8 Access to Information

The draft ESMF of the project 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 including safeguard aspects of the project to the key stakeholders. In addition, stakeholders' meetings will be held at all selected administrative areas to disclose the ToR and results of the ESIA. Representative of implementing authority, the study team, government officials from different departments, NGOs, local communities of different occupation, journalists, and local elite/civil society may attend the workshops. The participants will share their observations, views, and remarks with the study team in the workshops. Appropriate suggestions and recommendations on different issues from the stakeholders of the meeting would be incorporated in the program specific ESIA. The workshops will also help to resolve conflicting issues among stakeholders. Besides, FGDs and personal interviews will be carried out at the all selected administrative areas of the project area to generate communities' views and concerns. IAs could develop respective Communication Plans based on the nature of the sub-projects. For example: BLPA and RHD would require comprehensive Communication Plans. They both need to reach a larger community

Publication in electronic and print media: The information on program interventions and the findings of environmental assessment would also be disclosed through newspapers and electronic media (e.g., internet, TV, radio, etc.). The report would be disclosed in Bengali language.

Availability of the Document: Summary of the ESIA and ESMF report along with ESMP 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 IA's (MOC, BLPA, RHD, NBR) and World Bank. Hard copy of the ESIA and ESMF will also be available at District, Upazila offices of the program area.

8. INSTITUTIONAL ARRANGEMENT

BBIN-MPA Phase 1 project will be implemented by the BLPA, NBR, MoC (WTO cell) and RHD in Bangladesh. The BLPA is an autonomous body under the Ministry of Shipping that manages all land ports of Bangladesh. The NBR (Customs Wing) is under the Internal Resource Division of the Ministry of Finance. Its main functions are collecting duties and taxes, protecting domestic industry, trade liberalization, and trade facilitation. The MoC – WTO cell is mandated to implement WTO rules and regulations, build trade capacity and formulate and implement trade policies. All IAs have experience in implementing WB projects, notably the ongoing Bangladesh Regional Connectivity Project (BRCP), and are familiar with the Bank's financial management, procurement and environment and social safeguards policies. Except RHD, none of the agencies are familiar with the Bank's ESF.

Four Project Implementation Units (PIUs) will oversee the day-to-day administration of project activities, including, inter alia, (i) the management of designated accounts, (ii) financial management and reporting, (iii) execution of the audit of the project, (iv) preparation of quarterly financial and bi-annual progress reports, (v) management of the environmental and social safeguards aspects, and (vi) undertaking all procurement and contract management activities. The PIUs will be headed by full-time Project directors; be staffed with full-time technical experts and specialists in, inter alia, project management, procurement, financial management, environmental, health and social aspects, etc. The provision of a Project Implementation Services Consultants will also be considered.

A Project Coordination Committee (PCC) will be established to provide strategic and policy direction, review implementation progress, and facilitate the coordination of project activities. The PCC will report on progress to the National Trade Facilitation Committee (NTFC), as well as the Heads of the respective implementing agencies. Institutions and Roles in Project Implementation

The implementation agencies for the projects are BLPA, NBR, MoC and RHD.

8.1 Bangladesh Land Port Authority (BLPA)

The Chairman is the executive head of BLPA. He is assisted by Member, Traffic; Member, Development and Member, Finance and Administration and others are part time Members. Chairman is the head of the organization. BLPA has a total of strength 310 employees of which 46 are Class I officers, 18 are Class II officers, 203 are Class III staff and 43 are Class IV staff.

The project will have two Monitoring Committees. The upper-level committee will provide overall guidelines and cooperation for project implementation especially for the disbursement of fund provided in the RAP and liaise with various stakeholders including Development Partner, different governmental organizations and other relevant agencies. The upper-level committee will comprise-

- Representative from Ministry of Shipping (MoS);
- Representative from Local Administration (DC/Upazila Nirbahi Officer (UNO) or authorized representative);
- Representative from Local Government (Chairman/Ward member);
- Representative from BLPA;
- Representative from Project Affected Persons.

The PIU will also engage an independent organization to carry out external monitoring and evaluation on implementation of RAP; however, this component will not involve monitoring and evaluation of EMP due to limited nature of impacts.

The field level committee will be established one for each port is the same as local level and align with the GRM and will comprise-

- Concerned Port Officer as representative of BLPA- Chairman;
- Local UP Chairman-member;
- Concerned UP woman member- member;
- Representative of business community working in the port area (importer, exporter,

- Clearing and Forwarding (C&F) agent etc.) – member;
- Representative of PAPs- member;
- Sub-Assistant Engineer (SAE) of the port- Member Secretary.

The field level committee will be responsible for direct implementation of RAP especially making disbursement of payment of compensation to individual PAPs together and in coordination with the DC. They will facilitate the disbursement process through dissemination of Land Acquisition (LA)/RAP related information to PAPs and other stakeholders; assist the PAPs getting mutation and other documents needed for submission to DC to get payment of compensation; assist DC/UNO offices to identify suitable guardian to receive cheque on behalf of underage children; assist weaker segments among the PAPs (women, uneducated, lacking competence to deal land related issues) to get proper compensation in time; and cooperate and coordinate with DC/UNO offices to arrange disbursement of cheques to individual PAPs at local level.

8.1.1 Institutional Setting and Implementation Arrangement

BLPA will arrange for RPF/RAP implementation and monitoring mechanism. The PIU will have an Environmental and Social Cell in the PIU. At overall project level all RPF/RAP oversight will be ensured by BLPA. Executive Engineer of BLPA will head the Environmental and Social Cell of BLPA. One Assistant Project Director & one Project Manager each in charge for Environment and Social aspects of the project. The Deputy Director including Assistant Project Director & Project Manager of the Social cell will be assisted by a Senior Social Specialist-BBIN who is in-charge for Community Engagement and Gender. The Supervision Consultants and Contractors will have Environmental and Social Specialists to supervise and implement the RAP provisions. M&E Consultants (here Supervision Consultant) will do regular monitoring with periodic reporting as necessary. At the end of the project, an end-line evaluation will be carried out. The all of the monitoring and evaluation reports will be shared with Bank for their feedback. The BLPA considers that they can carry out midterm review and end line evaluation internally and does not intend to engage any third party. The third party may be engaged for impact evaluation at a later stage after two- or three-years project execution. There is no need to include any budget here for the midterm review or end line evaluation as third-party involvement is not required. At the time of impact evaluation, the project execution period is already over, and the budget cannot be included under the project.

Figure 8.1: PIU Environmental and Social Cell

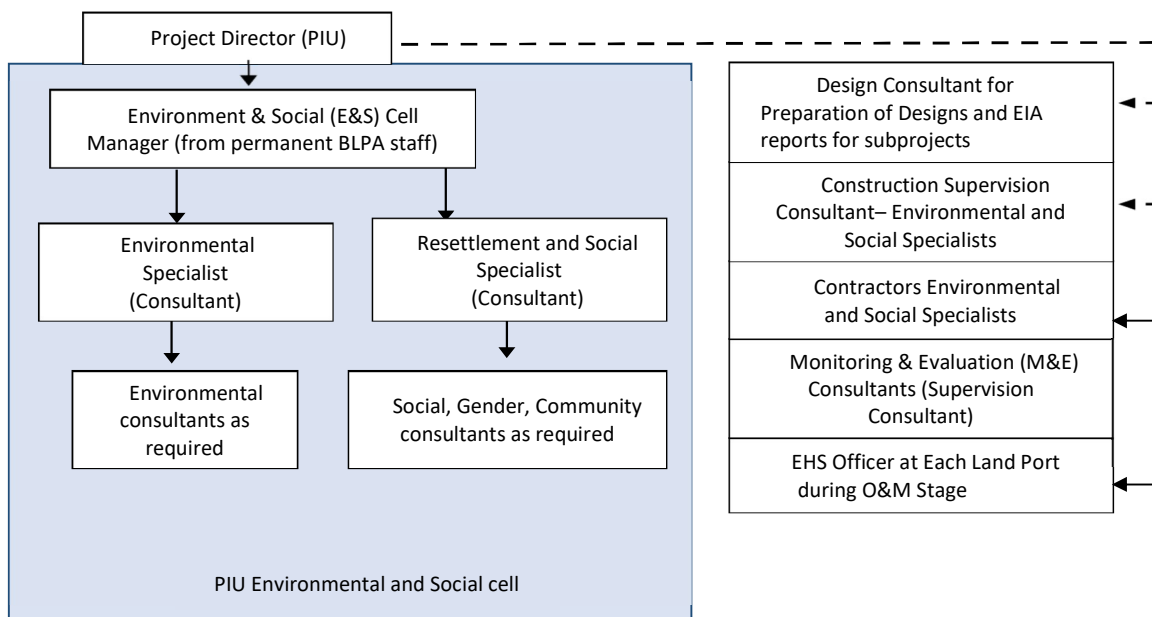


Table 8.1: BLPA Functions for RPF Compliance

Name	Organization	Functions
Project	BLPA Environment and social cell	<ul style="list-style-type: none"> ● Orientation and training to Field Units on RPF/RAP and providing oversight on the SIA process and its outputs ● Assisting in fulfilling requirements for all Category sub- projects ● Review of monitoring reports submitted by the M&E Consultants on RAP implementation ● Regularly visiting sub-project sites to review RPF compliance during sub-project planning and implementation ● Providing guidance and inputs to the Field Units on social management aspects ● Managing Monitoring Evaluation of RPF/RAP implementation ● Preparing half yearly and yearly Compliance Reports and sharing them with The World Bank ● All the actions related to ensure compliance with RPF.
Field	BLPA at port- level	<ul style="list-style-type: none"> ● Managing RAP implementation and monitoring ● Collecting data for monitoring ● Providing assistance to local communities ● Coordination with the other agencies for RAP

8.1.2 Consultant Support

The CSC functioning under the BLPA will be directly responsible for contract administration and day-to-day project supervision including environmental and social management. The CSC will consist of an environmental and social unit with 1 environmental expert and 1 social expert. The CSC will advise the BLPA and the PIUs on ESMP implementation and monitor the work of the contractors in the field. The consultants will also help the PIU prepare quarterly progress reports to be submitted to the BLPA, who in turn will submit semi-annual reports to co-financier for review. The CSC will, inter alia, be responsible for the following-

- Engage international/national environment specialists to ensure proper implementation of ESMP provisions;
- Undertake regular monitoring of the contractor's environmental performance, as scheduled in the ESMP;
- Conduct periodical environmental audits;
- Prior to construction, review and approve CESMPs/method statements prepared by the contractors;
- Supervise site environmental management system of the contractors, and provide corrective instructions;
- Monitor the implementation of the CESMP and review the environmental management and monitoring reports prepared by the contractor;
- Review and report on CESMP implementation by the contractor.

Overall, CSC is responsible for ensuring the proper and timely implementation of all their tasks specified in the ESMP.

8.1.3 Contractors

An ESMP has been prepared to mitigate Project's environmental and social risks and impacts. It includes mitigation measures, monitoring plan, capacity building, responsibilities and reporting system and budget. In addition, the ESMP provide measures to address GBV issue at project level. The ESMP obligates the contractor, upon mobilization, to prepare the C-ESMP, which shall be approved prior to the commencement of construction activities. The Contractor's CESMP shall include OHS plan, Water and Waste Management Plan, Influx management Plan, Workers camp management plan, CHS Plan, Traffic management and road safety management Plan, Quarry/borrow area management plan, Procedure to compensate for damages caused to structures while using heavy machineries, and Site restoration Plan among others in accordance with the GoB and IFC & WB workers accommodation

guidelines. All such plans will be reviewed and approved by the PMU of RHD prior to commencement of construction works. The approved C-ESMP shall be reviewed periodically (but not less than every six (6) months), and updated in a timely manner.

The contractor will be primarily responsible for preparing implementing the CESMP. Each contractor will be recommended to have one Environmental Specialist and one Occupational, Health and Safety (OHS) Specialist and one Social Specialist who will be working in close coordination with the environmental staff of CSC and PIU. The main functions of the contractor with regard to environmental and social management and monitoring are to-

- Prior to the start of construction, prepare the CESMP and other method statements and management plans according to requirements of ESMP and get them approved by CSC.
- Recruit qualified environmental and social safety officers (ESO) to ensure compliance with environmental and social contractual obligations and proper implementation of CESMP;
- Provide sufficient funding and human resources for proper implementation of CESMP;
- Prepare monthly reports related to environmental and social management and monitoring for review and verification by the CSC;
- Prepare and implement an Environmental Management system according to the requirement specified in ESIA/ ISO 14001.

8.1.4 Roles and Responsibilities

The BLPA will be responsible for implementation of the project. The BLPA will establish a Project Implementation Unit, headed by the Project Director at the Project office which will be responsible for the overall execution of the project. The PIU consists of Engineering service unit, environmental management consultant and social specialist for total implementation of the project. The Chairman, BLPA, will oversee the project PIU activity.

Table 8.2: Roles and Responsibilities for ESMP Implementation

Organizations	Responsibilities
PIU/BLPA	<ul style="list-style-type: none"> ● Ensure that all project activities are well-managed and coordinated. ● Procurement of works and goods. ● Payment of compensation to the project affected people ● Recruitment and supervision of Construction Supervision Consultants (CSC) ● Recruitment and supervision of external monitor and independent Panel of Experts ● Carry out environmental assessment of sub projects in Component 1A implementation. ● Quarterly reporting on RAP implementation to BLPA. ● All the actions related to ensure compliance with RPF as directed by BLPA and preparatory studies in Component 1C in compliance with the World Bank and Government of Bangladesh requirements
E&S Cell within PIU/BLPA	<ul style="list-style-type: none"> ● Responsible for assisting PD with developing TORs and hiring of consultants to carry out any required environmental assessment work for subprojects and also for preparatory studies in Component 1C, reviewing consultant deliverables related to environmental assessment, reviewing bid documents for inclusion of ESMP measures, supervising construction activities, producing periodic monitoring reports, ● Ensuring inclusion of ESMP in bidding documents ● Providing training on ESMP principles and requirements to CSC, contractors, BLPA field staff, and others as needed to ensure effective implementation of ESMP ● Supervising CSC for the implementation of ESMP ● Closely coordinate with other concerned agencies, local governments and communities to support implementation of ESMP ● Preparation of progress reports on implementation of ESMP. ● Ensure effective implementation of ESMP components not directly tasked to the contractor including components dealing with indirect, induced and cumulative effects, as well as operations and maintenance stage plans and measures. ● Commissioning and oversight/review of consultant reports for ESIAs/ESMPs to be developed for the subcomponents of the Project

Organizations	Responsibilities
	<ul style="list-style-type: none"> • Ensure compliance of the studies on Component 1C (Component 1C: Preparation Studies and Activities to Enhance Connectivity of Land Ports and Project Implementation Support) comply with World Bank and Government of Bangladesh requirements. • Responsible for developing standard environmental code of practices during operation stage of land ports
EHS Officer at each Land port	<ul style="list-style-type: none"> • Responsible for implementing standard environmental code of practices during operation stage of land ports • Implementation of mitigation and monitoring measures during operation stage of the land ports (monitoring of dust, traffic, solid waste collection and disposal, OHS issues, etc.)
ESIA Consultant	<ul style="list-style-type: none"> • Carrying out ESIA studies in compliance with the GoB and World Bank guidelines following the ESMF. • Preparing ESMP for inclusion in the bid documents.
Contractor	<ul style="list-style-type: none"> • Responsible for implementation of mitigation and monitoring measures proposed in the ESMP • Each contractor will recruit an Environmental, Health, and Safety (EHS) Manager, who will be responsible for implementing the contractors' environmental, health and safety responsibilities, and liaising with government agencies. S/he will have adequate number of staff to support him/her for these tasks.
M&E Consultant	<ul style="list-style-type: none"> • External Monitoring and evaluation of RAP

8.2 Ministry of Commerce (MoC)

Institutional Arrangement for MoC-WTO Cell

Under Component 03, BBIN-RTTF phase 01 project MoC will get technical assistance to implement the trade facilitation agreement by Setting up of National Trade Facilitation Committee (NTFC) Secretariat and support the development and implementation of National Trade and Transport Facilitation Action Plan, review of trade related policies, regulations and agreements with skills development and capacity building support. As per the existing institutional arrangement for BBIN, MoC has a coordinating role to synchronize trade related activities of the other two components through a national level trade and transport facilitation committee. This technical assistance project being implemented in the Ministry of Commerce through a Project Implementation Unit (PIU) in the WTO Cell with the administrative structure comprising a project director , project manager (01), national trade expert (01), procurement specialist (01), financial management expert (01), data management consultant (01), focal person coordinator , legal expert (01), senior trade specialist (local consultant) (01), junior trade specialist (01), jr. monitoring & supervising consultant (02), gender specialist (01) (for training program, 120 working day). The existing project implementation unit will be strengthened by appointing by appointing a social development and stakeholder engagement expert and a gender/SEA-SH specialist to support ES monitoring unit for ensuring proper implementation of ES requirements. The institutional arrangements for MoC-WTO and MoF- NBR have been illustrated in Figure 8.2.

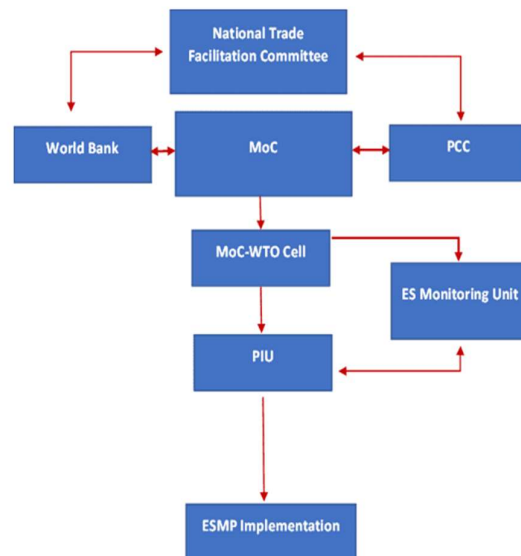


Figure 8.2: Proposed Institutional Framework of MoC-WTO Cell for Implementation of the ESMF

8.3 National Board of Revenue (NBR)

Institutional Arrangement for NBR under MoF:

Bangladesh Customs is working under the umbrella of National Board of Revenue (NBR), the apex body for direct and indirect tax revenue in Bangladesh. NBR is the major organ of Internal Resources Division (IRD) under the ministry of Finance, Government of Bangladesh. The MoF will be leading implementation of component 2 of the project and a project implementation unit (PIU) will be setup in the Department of Customs under NBR. A Project Coordination Committee (PCC) normally include the agency's Head (Chairman, Director General, or Secretary), relevant members, the Project Director and sub-project/field managers, representatives of the Economic Relations Division (ERD) under the Ministry of Finance, Planning Commission, Implementation Monitoring and Evaluation Division (IMED) of the Planning Ministry, and the parent technical ministry (Ministry of Finance for NBR, Ministry of Shipping for BLPA). The PCC will be responsible for strategic discussions and decisions, inter-agency coordination, and overall project monitoring and oversight. The PCC would be expected to meet on a six-monthly basis or on an as-needed basis. The PIU includes– Project Director, Deputy Project Director, a procurement consultant, a project management/monitoring and evaluation (M&E) consultant, environmental specialist, social development and stakeholder engagement specialist (full time to support ES monitoring unit) for the following core functions: grant administration including disbursement, ES management, waste management, compliance monitoring, monitoring and evaluation, financial, procurement management, and reporting. Besides, one professional laboratory analyst with two laboratory technicians will be hired for capacity building and modernization of the chemical laboratory facility inside Chattogram Customs house under the project. In addition, the PIU will ensure coordination of project implementation, including supervision of and support for the implementation of the sub-project (Figure 8.3).

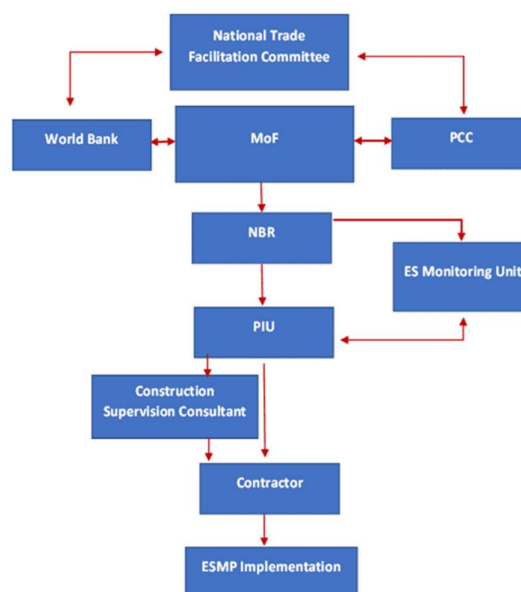


Figure 8.3: Proposed Institutional Framework of NBR-MoF for implementation of the ESMP

8.4 Project Implementing Units

The Project Implementation Unit will be established under the RHD and will include an Environmental and Social unit (ESU). The ESU will consist of one Executive engineer, one sub-divisional engineer and two assistant engineers to monitor environmental compliance. Similarly, the social unit will comprise of one Executive engineer, one sub-divisional engineer and two assistant engineers who will be tasked with ensuring and monitoring compliance related to the social dimensions of the project. The ESU will be responsible for overseeing the monitoring activities conducted by the CSC on behalf of RHD. It will also be monitoring the activities of the contractor through the activities of PIU. The main activities of the ESU with regard to environmental and social safeguards are:

- Planning and implementation of ESMP
- Ensuring that the social and environmental protection and mitigation measures in the ESMP are incorporated in the Construction Environmental and Social Management Plan (CESMP);

- Ensuring that the CSC commits and retains dedicated staff as social and environmental managers to oversee CEMP implementation
- Supervision and monitoring of the progress of activities of the consultants and contractors for the implementation of different components of ESMP
- Provide guidance to PIU, CSC and contractors in conducting subsequent monitoring and reporting and in undertaking corrective options
- Responsible for modifications to the ESMP when unforeseen changes are observed during implementation.
- Ensure submission of periodical environmental and social management and monitoring reports to the steering committee and co-financiers through RHD;
- Submit semi-annual monitoring reports on ESMP implementation for co-financiers review through RHD;
- Ensure the establishment and implementation of an environmental and social management system;
- Implementation of environmental monitoring measures (such as environmental quality monitoring, tree plantation, landscaping, wildlife monitoring) during the O/M stage of the Project.
- Promote improved social and environmental performance through the effective use of management systems;
- External communications with other government, semi-government and non-government organizations, universities, research institutes in the country on the matters of mutual interest related to environmental management and filming of activities to be carried out under the project development.

8.5 Capacity Assessment of IAs

The Bangladesh Land Port Authority (BLPA), National Board of Revenue (NBR) and the Ministry of Commerce (MOC WTO Cell) will implement component 1; component 2 and component 3 respectively. All three implementing agencies (IAs) are currently implementing the Bank-funded Bangladesh Regional Connectivity Project (BRCP), using the Bank's safeguards policies as guiding frameworks. All IAs have experience in implementing Bank-funded projects and are familiar with the Bank's financial management, procurement and environment and social safeguards policies and have adequate institutional knowledge of institutional E&S risk management. However, the proposed project will be the first under ESF, except RHD who are currently implementing the Bank-funded WECARE MPA program, suggesting the need for upfront technical support to the project teams towards adequate assessment and management of environmental and social impacts of the program. All four IAs have Project Implementation Units (PIUs) with dedicated E&S specialist by BLPA. However, in general, all the IAs will require further institutional E&S risk management capacity building given the expanded scope of E&S management under ESF.

8.5.1 Ministry of Commerce (MoC)

Ministry of Commerce (MoC) has not been involved in WB funded projects. The World Bank has not performed any capacity assessment of the MoC on the implementation of environmental and social safeguards in donor-assisted projects.

The Consultants will work under direct control of the Project Director under the supervision of relevant Deputy Project Director. Consultants will report directly to the Project Director/relevant Deputy Project Director with close collaboration with other officials of the Project. They shall be accountable to the Project Director/ relevant Deputy Project Director for his/her day-to-day activities. NBR will provide the expert working space and office consumables at PIU premises in Dhaka. All international travel, city transportation arrangements, and accommodation will solely be the Consultant's own responsibility. If necessary, MoC will assist in finding accommodation during his stay in Bangladesh. MoC may provide further reasonable assistance for Visa and other activities in connection with carrying out his responsibilities under the project scope, upon the request. The ITS will be paid a negotiable consolidated

remuneration inclusive of all applicable Tax and VAT as per law of Bangladesh. The language of the project and all reports shall be English and translation or interpretation to/from Bangla will be provided, if necessary, by the PIU. The ITS will submit a brief monthly Progress Report (applicable only if his/her input is provided to the project in that month) to the PIU and the designated team detailing the progress of all activities and any impediments encountered that may jeopardize the good progress of the project. PIU will provide the ITS with access to documents relevant to the assignment, including previous studies, legal texts and regulations, etc., and will facilitate meetings with key counterparts.

8.5.2 National Board of Revenue (NBR)

The national board of revenue (NBR) are taking steps towards strengthening the existing efforts of the government of the people's republic of Bangladesh (GoB) in the area of public financial management reforms. The World Bank performed a capacity assessment of the NBR on the implementation of environmental and social safeguards in donor-assisted projects. Some of the initiatives supported by the World Bank are, VAT Online Project (VOP), Strategic Action Plan for Customs Modernization, Conduct TRS of Chittagong, Benapole, Dhaka Custom House and Dhaka ICD, VAT improvement program, Revenue Mobilization program. Most of the NBR's current projects are related to infrastructure development, including construction of revenue building in the city's Agargaon area.

The Consultants will work under direct control of the Project Director under the supervision of relevant Deputy Project Director. Consultants will report directly to the Project Director/relevant Deputy Project Director with close collaboration with other officials of the Project. They shall be accountable to the Project Director/ relevant Deputy Project Director for his/her day-to-day activities. NBR will provide the expert working space and office consumables at PIU premises in Dhaka. All international travel, city transportation arrangements, and accommodation will solely be the Consultant's own responsibility. If necessary, NBR will assist in finding accommodation during his stay in Bangladesh. NBR may provide further reasonable assistance for Visa and other activities in connection with carrying out his responsibilities under the project scope, upon the request. The ITS will be paid a negotiable consolidated remuneration inclusive of all applicable Tax and VAT as per law of Bangladesh. The language of the project and all reports shall be English and translation or interpretation to/from Bangla will be provided, if necessary, by the PIU. The ITS will submit a brief monthly Progress Report (applicable only if his/her input is provided to the project in that month) to the PIU and the designated team detailing the progress of all activities and any impediments encountered that may jeopardize the good progress of the project. PIU will provide the ITS with access to documents relevant to the assignment, including previous studies, legal texts and regulations, etc., and will facilitate meetings with key counterparts.

8.5.3 Bangladesh Land Port Authority (BLPA)

The BLPA has implemented a variety of initiatives supported by the World Bank, the Asian Development Bank, Japan International Cooperation Agency, and other donors. Within the BLPA, there is an in-house social and environmental circle (SEC). Delegated officers are also responsible for bringing environmental and social issues to the attention of high management. Currently, SEC engineering officers are tasked with reviewing environmental and social assessments submitted by consultants, but they are not tasked with reviewing the ESMP's adequacy. The DOE of the Ministry of Environment, Forests, and Climate Change (MoEFCC) reviews and approves the IEEs/EIAs and EMPs. The BLPA SEC is not directly involved in project delivery, but instead has administrative responsibilities for ensuring environmental compliance and a broader role in raising environmental awareness for BLPA. BLPA authority will train up their existing staffs for monitoring during operation and maintenance period and they will periodically perform these monitoring and evaluations during operation phases.

8.6 Action Plan to Strengthen Staffing, Capacity, Systems and Implementation

Project Co-ordination Institutional Arrangements and capacity Building for environmental and social management:

A number of institutions will be involved during the construction and operation phase of the sub-project to achieve the environmental compliance goal set by ESMP. In order to strengthen the existing institutional capacity of NBR, MoC and RHD for environmental and social management the Project will develop and implement systems and measures. Each of these Project Implementing Units (PIU) will include a Social, Environmental and Communication Cell headed by a Deputy Director which will be staffed by qualified specialists (consultants) as mentioned earlier under the Project. The PIU will also engage project management consultants (PMC) to supervise the contractors including their execution of construction-related ESMPs and ECoPs. The Environmental and Social Specialist within the E&S Cell will assist the PIU on issues related to environmental and social management, including overseeing the PMC and contractors with respect to environmental issues, orientating contractors and field staff to ESMP requirements, reviewing PMC monthly monitoring reports, and compiling quarterly monitoring reports on ESMP compliance for the Project Director and the World Bank throughout the construction period. Prior to completion of construction, each PIU will appoint permanent Environment Specialist, Social Specialist, Gender Specialist, Occupational, Health and Safety specialists as required for overseeing the sub-project activities, who will be responsible for overseeing the environmental and social mitigation measures during operation and maintenance period.

With particular reference to the proposed master plan of Chattogram Customs House, a full-fledged chemical laboratory will be setup in a three storied building occupying 5,500 sft area for which a professional lab analyst trained on modern lab facilities, equipment handling, bio-safety and waste management protocols with two lab technicians will be hired to support the ES monitoring unit under NBR. These specialists will be trained enough throughout the project to effectively transfer the adequate skills and knowledge to the workforce and carry out their roles even after the Project closes. An environmental and a social specialist under the PIU who will be responsible for:

- Preparation and consultation for required ES instruments
- Addressing ES risks and impacts including monitoring of the implementation of all ES instruments, community health and safety measures, the functioning of the grievance redress mechanism (GRM), etc.
- Screening of subprojects (Annex A) for ES issues, disclosure, review and clearance of subprojects to monitoring the implementation of the ESMP
- Prepare relevant ESMP and ensure implementation and monitoring

Environmental and Social specialists will be full time consultants for each of the PIUs to monitor ESMF, ESCP, SEP and LMP implementation and ensure compliance with both World Bank and Government E&S requirements.

Capacity building training is needed for BLPA, RHD, NBR, MoC officials. The project will finance sub-project level officers and staff training related to RAP implementation, gender and vulnerability for BLPA and RHD, etc. The PIUs will have their own capacity building plan and the tentative budget provided here is supplementary to it.

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 BBIN-RTTF phase 01 project, including PIUs and contractors. At the construction site, PIUs will take the lead in implementing the capacity building plan, though the contractors will also be responsible to arrange 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 for the BBIN-

RTTF phase 01 has been prepared which will guide to build capacity of the PIUs for implementing this ESMF. Following paragraphs provide summary of the capacity building requirements as assessed in this report.

Training on Environmental & Social Management

Capacity building for effective implementation of the ESSs requirements is a key element of the ESMP. Capacity building for environmental and social standards management will need to be carried out at all tiers of the program, including IAs (NBR, BLPA, RHD, MOC), Project Management Consultant (PMC), and contractors. PMC will take the lead in implementing the capacity building plan at the construction site, though the contractors will also be responsible for conducting training 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 program, ESMP requirements, OHS aspects, and waste disposal.

all PIU staff and Land Port level staff will receive training and capacity support from the PMC safeguard specialists to ensure learning and development and smooth and effective implementation of the ESMP and resettlement plan.

Training shall be imparted, on a regular interval, to the IAs (NBR, BLPA, RHD, MOC) officials and Staff on Environmental and Social Issues. The ESMF document will be used as training material for IAs officials/staff capacity building, and the Environmental & Social Specialist will act as facilitators for the capacity building sessions. If the Consultants, ES & SS, do not feel confident on their subjects, the ESIA consultants will initiate training for the IAs (NBR, BLPA, RHD, MOC) officials as a TOT course on ESS issues. Later on, the IAs officials and Consultants will train the Contractors' people on safeguard compliance.

BLPA authority will train up their existing staffs for monitoring during operation and maintenance period and they will periodically perform these monitoring and evaluations during operation phases apart from their general tasks.

The below tables are prepared to estimate the cost for hiring specialist to implement this project for all the IAs.

MOC

SI	Expert's Position	Remuneration	
		Monthly	Annually
1.	Gender Specialist (01)	450,000	5,400,000
2.	Environmental and Social Development/Stakeholder Engagement Specialist	450,000	5,400,000
Total (BDT)			10,800,000
Total (USD)			127,059

NBR

SI	Expert's Position	Remuneration	
		Monthly	Annually
1.	Environmental Expert (01)	450,000	5,400,000
2.	Social Development and SE Expert (01)	450,000	5,400,000
3.	OHS and Labor Management Expert (01)	450,000	5,400,000
4.	Gender and SEA/SH Expert (01)	450,000	5,400,000
5.	Lab Analyst	200,000	2,400,000
6.	Lab Technician	150,000	1,800,000
Total (BDT)			25,800,000
Total (USD)			303,529

BLPA

SI	Expert's Position	Remuneration	
		Monthly	Annually
1.	OHS and Labor Management Expert (01)	450,000	5,400,000
2.	Land Acquisition and Resettlement Expert (01)	450000	5,400,000
3.	Environmental Expert	450000	5,400,000
4.	Gender and SEA/SH Expert	450000	5,40,0000
5.	Social Development and Stakeholder Engagement Expert	450000	5,400,000
Total (BDT)			27,000,000
Total (USD)			317,647

(1 USD= 85 BDT)

[Salaries including Tax and VAT] TOTAL: BDT 63,600,000 [USD 748235]

Training/ Seminar

Seminar Topic/ Training Module	Budget			Time Frame
	BLPA [3 Ports]	NBR	MOC	
Introduction to World Bank ESF	1,500,000	500,000	500,000	Year 1
Labor and working conditions and OHS	1,500,000	500,000	500,000	Year 1
Community health and safety	1,500,000	500,000	0	Year 1
Grievance Redress Mechanism	1,500,000	500,000	0	Year 1
Stakeholder Engagement	1,500,000	500,000	500000	Year 1
Gender and SEA/SH/GBV	1,500,000	500,000	500000	Year 1
Review of RPF and RAP	900,000	0	0	Year 2
ESMP compliance monitoring	600,000	100,000	0	Annually
RAP compliance monitoring	600,000	0	0	Annually
OCHS and Labor Management audit	600,000	100,000	0	Annually
Contract and Consultant Management Module	600,000	100,000	100,000	Year 1
Safe Chemical and Laboratory Management	1,000,000	500,000	0	Year 1
Advanced Laboratory Techniques and Instruments Handling	2,000,000	500,000	0	Year 1
TOTAL (BDT)	15,300,000	4,300,000	2,100,000	21,700,000
TOTAL (USD)	180,000	50,588	24,706	255,266
	Budget			Time Frame
	BLPA	NBR	MOC	
Other Items				
Travel	600,000	100,000	0	Periodically
E&S Monitoring and Reporting	600,000	100,000	0	Periodically
Studies (lumpsum)	500,000	200,000	100,000	Annually
Communications (materials and campaign)	1,500,000	500,000	500,000	Bi-annually
OHS Materials (e.g., Mask/ Disinfectant Spray/ Handwash etc.)	1,500,000	500,000	500,000	Annually
TOTAL (BDT)	4,700,000	1,400,000	1,100,000	720,0000
TOTAL (USD)	55,294	16,471	12,941	84706

(1 USD= 85 BDT)

8.7 Conclusion

All the sites under the project are extension or upgrading of the existing infrastructures. The activities will be carried out on the current E&S footprints and hence, essentially consist of modified habitat. The potential impacts are limited and can be easily managed by applying standard GIIP and the relevant provisions in the ESMPs in compliance with the Bank's ESF and Bangladeshi laws.

ANNEXES

Annex A: Sample Checklist for Environmental and Social Screening of Sub-Projects

Subproject Name		
Implementing Agency		
Subproject Location		
Estimated Investment		
Start and Completion Date		

Sub-project Description and Key Activities: Please fill the table below

Name of the sub-project	Type of Intervention/s	Key stakeholders	Brief description of the design

SI No	Screening criteria	Response to the Question		ES Impact						Remarks
		Yes	No	No Impact	Positive Impact	Negative Impact				
						Low	Moderate	Substantial	High	
ESS-1: Assessment and Management of Environmental & Social Risk and Impacts										
1	Does the subproject carry risk that disadvantaged and vulnerable groups may have unequitable access to project benefits?									
2	Will the project contribute to any long-term significant adverse (negative), large scale, irreversible, sensitive impact at a regional scale or area broader than the project sites?									
3	Whether accessibility of differently able people have been made in the project design?									
ESS-2: Labor and Working Conditions										
4	Does the subproject involve recruiting workers, including direct, contracted, primary supply, and/or community workers?									2

² If yes, please provide the tentative numbers here. Such as: 1. number of Local laborers, migrated labors, community labors, supply workers and number of contractors

SI No	Screening criteria	Response to the Question		ES Impact						Remarks
		Yes	No	No Impact	Positive Impact	Negative Impact				
						Low	Moderate	Substantial	High	
5	Will there be migrated labor in the project?									3
6	Will there be any labor camp for the accommodation of the labors?									4
7	Will there be separate facilities for women workers?									
8	How severely the project activities can impact the OHS of the workers?									5
9	Is there a possibility of employing vulnerable workers, including women and child labor?									6
10	Does the project area present considerable Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) as well as Sexual Harrassment (SH) risk?									7
11	Is there possibility that activities and deployment of labor would cause potential GBV cases?									
12	Will the activities cause interaction between laborers and communities in view of COVID-19 situation?									
13	Is there any potential for conflict between construction workers and local peoples (and vice versa)?									
14	Does the subproject have a GRM in place, to which all workers have access, designed to respond quickly and effectively?									
ESS-3: Resource Efficiency and Pollution Prevention and Management										
14	Will the activities use or generate substances that will cause pollution of water bodies (groundwater/surface water) during the construction or use of the facilities?									

³ Answer should be linked above

⁴ Labor camp, rented house etc.? If a labor camp is required, should a location be mentioned?

⁵ Accidents, safety, Covid-19

⁶ Engaging vulnerable women is preferred but adequate safety measures must be taken

⁷ Answer should be linked with question 8. Also, community based GBV/SEA/SH should be considered including previous history.

SI No	Screening criteria	Response to the Question		ES Impact						Remarks
		Yes	No	No Impact	Positive Impact	Negative Impact				
						Low	Moderate	Substantial	High	
15	If the sup-project is located by the side of a river, is there any drinking water source upstream and downstream of the project location that can be affected?									
16	Are there any low-lying areas prone to water logging/flooding due to project activities?									
17	Is there necessity of substantial removal of Top Soil?									
18	Will the project / any of its component might contaminate or pollute the Land?									
19	Will the project result in stagnation of water flow or pondage or weed growth									
20	Will the project use or store dangerous substances (e.g., massive quantities of hazardous chemicals/ materials like Chlorine, Diesel, Petroleum products; any other?									
21	Will the project produce solid or liquid wastes; including construction/demolition wastes (including de-weeding wastes, muck/silt, dust); polluted liquids?									
22	Will the project cause or increase air pollution or odor nuisance?									
23	Will the project cause or increase noise pollution or vibration level?									
24	Is there any potential for release of toxic gases or accident risks (e.g., potential fire outbreaks)									
ESS-4: Community Health and Safety										
25	Will the project result in Health & Safety Risks in the neighborhood?									
26	Is there possibility of potential disruption to common property, accessibility, traffic system etc. due to project activity?									8
27	Will the activities affect other communities who rely (or might									

⁸ If common properties are affected or disrupted, please link with ESS5 as well.

SI No	Screening criteria	Response to the Question		ES Impact						Remarks
		Yes	No	No Impact	Positive Impact	Negative Impact				
						Low	Moderate	Substantial	High	
	become dependent) on the same resources that the proposed activity will be using?									
28	Will the activities create a situation that may threaten the livelihood of people who have been providing similar types of services in the community?									
29	Are there any sensitive ES receptors such as residences, schools, hospitals etc. which the project might impact?									
30	What types of precautions have been taken to limit the spread of COVID-19 pandemic?									
	(i) Wearing Mask									
	(ii) Maintaining PPE									
	(iii) Using sanitizer									
	(iv) Regular temperature checkup									
	(v) Disinfection facilities									
ESS-5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement										
30	Will the proposed activities potentially involve resettlement and displacement, land acquisition, restrictions and economic displacement of persons and communities?									
31	If the answer to Ques. 28 is yes, answer below and write detailed here.	Please write detailed here								
31a	Will there be any land acquisition or requisition?	Please write the purpose of acquisition or requisition here								
31b	Is the ownership status of the land known? If yes, please provide details here.									9
31c	Is there a possibility of voluntary land donation? If yes, please provide details here.									10
31d	Will there be any loss of residential, commercial or community structures?									11
31e	Is there any presence of squatters who may be affected due to interventions?									

⁹ Government/private or owned? by other entities

¹⁰ If yes, who will donate?

¹¹ Please provide numbers here, if the answer is yes

SI No	Screening criteria	Response to the Question		ES Impact						Remarks
		Yes	No	No Impact	Positive Impact	Negative Impact				
						Low	Moderate	Substantial	High	
31f	Will there be any loss of trees, crops, or any fixed assets?									12
31g	Would the resettlement site be culturally sensitive?									
ESS-6: Biodiversity Conservation and Sustainable Management of Living Natural Resources										
32	Will the activities be located within or close to protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites?									
33	Is there any possibility of degradation of land / eco-systems due to the project activities?									
34	Is there any possibility of tree cutting that may have impact on local ecology?									
35	Will the activities cause any degradation to the nearby aquatic environment?									
ESS-7: Indigenous/Tribal Peoples										
36	Will the activities affect tribal peoples affected by the project interventions?									13
ESS-8: Cultural Heritage										
37	Loss or impacts on Cultural/heritage properties									
ESS-10: Stakeholders Engagement and Information Disclosure										
38	Has the screening team conducted any consultations with the different stakeholders during screening?									
39	Do the local people aware of the proposed project?									
40	Were there any information shared in print with the stakeholders during consultations?									

¹² Numbers and types

¹³ If yes, please provide details here. Also communicate with Bank's E&S team.

Conclusions

<i>Sub-Project Category</i>	<input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> Substantial <input type="checkbox"/> High
Key Reasons	
E&S Instruments Required	<input type="checkbox"/> <i>Detailed ESIA and ESMP</i> <input type="checkbox"/> <i>Resettlement Plan</i> <input type="checkbox"/> <i>Site-specific ESMP</i>

Annex B: Details of Public Consultation Meeting and Focus Group Discussions**Burimari Land Port****Summary of Consultation Meeting with Officials (I)**

Sl	Key Issues Raised	Participant/S Type	Response
1	Brief on the project	AD, Burimari Land Port	The AD of Burimari Land Port welcomed and thanked all the participants for their presence in the public consultation meeting. Then he gave a brief on the project.
		Environmental and Social consultants	The consultants discussed to the participants what environmental and social standards will be maintained throughout the project like, preparing separate documents on Environmental and Social Management Framework (ESMF), Environmental and Social Impact Assessment (ESIA), Stakeholder Engagement Plan (SEP), Labor Management Procedure (LMP), Resettlement Policy Framework (RPF), Resettlement Action Plan (RAP), Sexual Exploitation & Abuse and Sexual Harassment (SEA/SH), Gender Action Plan (GAP), Environmental and Social Commitment Plan (ESCP)
		Company Commander, Border Guard Bangladesh (BGB)	The BGB company commander then said that his organization would try to provide all possible assistance in implementing the project.
2	How the price is determined in case of land acquisition?	AD, Burimari Land Port	Social consultants firstly said that, for the development or expansion of the existing land port, according to the World Bank's Environmental and Social Framework (ESF) the project Implementing Agency's primary target is to avoid any kind of private property/ land acquisition. If it is not avoidable then the project will go following the Resettlement Policy Framework and Resettlement Action Plan for land acquisition where policy from both the Government of Bangladesh and The World Bank will be followed. It was also discussed that, to determine the price of land or any kind of loss (e.g. structures, crops, tress, business etc.) there will be Property Valuation/Market Survey.
		Mr. Sayed, President, C&F Agents Union	He said that, if possible, there would be about 25 acres of vacant land on the east side of the present port. That space can be acquired and used for project work.
3	If someone runs a floating business on other's land or Government-owned land (Khas) and if that business is affected, how will that person be paid compensation?	Md. Anowar Hossain (In-Charge, Immigration Police, Burimari land port)	Answering the question raised by the Immigration Police consultants discussed in the meeting that any business, whether small, medium or large, permanent or temporary, would be compensated if affected by the project. The participant also wanted to know, if land acquisition takes place, compensation will be determined for the lands on the front side of the road and that are away from the main road. Consultants informed that by evaluating the market survey and government rate land price, all

SI	Key Issues Raised	Participant/S Type	Response
			affected person/s should get a fair price for their land parcel.
4	If land acquisition takes place what will the community living very close to the land port do	From representatives that are living in the proposed land area adjacent to the existing land port (near zero point)	Consultants assured them again that if land acquisition is unavoidable, then the project will follow the RAP and accordingly affected persons will be compensated and provided support for their resettlement.
5	Education system and children's security	Mst. Rahena Sultana, Head Teacher of primary school, and Community representatives	<p>Stone is the most important of the various products imported through this land port. The stone crushing business around this port area is currently making a huge contribution to the economy of Burimari. But due to the business of stone crushing, stone powder, etc., the environment has become much polluted in the area around 5/8 km near Burimari port. All the citizens living here are moving in a dusty and sandy environment. As a result, people are suffering from shortness of breath, asthma, cold and cough. The headmistress drew the attention of the authorities to keep in mind reducing the environmental pollution by expanding and modernizing the port area.</p> <p>The participants agreed with what she said and they suggested Participants suggested that a particular area with boundary be set up in an uninhabited area for the stone related businesses and that the companies regularly set up sprinklers on their behalf and abide by those rules.</p> <p>Nearly one third of the participant said that the education system in this area is poor. In addition, it is plagued with various problems due to which number of school dropout is also high.</p> <p>More than 15 primary school is located in this area contrarily only 1 high school and 1 college which is 6 kilometers away from this area.</p> <p>The Head Teacher again said, 'A country is bigger than the individual'. Therefore, in the interest of development of the country, we have to take any kind of action positively. But the project will be implemented by giving priority to the 6 basic needs of the people - that is what they hope. Burimari is not as green as before. All the trees in the area are now covered in dust. If the Ministry of Environment initiates a tree planting program here, it is very good for the area.</p> <p>Excessive load-shedding has resulted in students not being able to study properly.</p>
6	Labor related issues	Mst. Rahena Sultana, Head Teacher of primary school	<p>All workers who come to the area to work on the project must ensure that they are provided with the Covid-19 vaccine.</p> <p>The use of gloves, helmets, boots, etc. should be ensured to avoid the risk of accidents and safety of those who will work as laborers.</p>
		President, Landport labor union	About 3000 workers are involved in various activities of the port. They do not have restrooms,

SI	Key Issues Raised	Participant/S Type	Response
			toilets, overnight accommodation etc. in the port area.
		Mr. Sayed, President, C&F Agents Union	There is no accommodation for the drivers of freight vehicles arriving in the port area. Most of the incoming drivers spend the night in freight cars or trucks. Which is very risky for them to do their job properly. So accommodation needs to be arranged for them.
7	Communication facilities	All Participants	<p>Getting students to school is challenging as they have to sit in traffic jams for a long time almost every day.</p> <p>In addition, Heavy mud in rainy days and extensive dust in normal times creates a tremendous suffering to the school-college going children.</p> <p>Furthermore, road accident happens very often there, driving of over loaded tracks in less width road is responsible for accidents.</p> <p>Accidents often happen because of narrow roads, broken roads. In addition, dust, severe traffic congestion has made communication in this area difficult.</p> <p>Communication will be much easier if a bypass road can be made from Burimari Land port zero point aligning with the rail way line. Undoubtedly it will be a tremendous support for local residence.</p>
		Mr. Sayed, President, C&F Agents Union	The highway that started from Burimari Zero Point area and passed through Burimari Bazar towards Patgram is quite narrow considering the number of vehicles currently plying in the area. This road needs to be at least 6 lane. This will almost completely alleviate the severe traffic congestion in the area.
		Company Commander, Border Guard Bangladesh (BGB)	He said if the port is developed, the country will develop. First, the allocation of BGB's security needs to be expanded. The existing highways need to be widened. A separate walkway has to be built for people to walk. In this project, all the infrastructural development has to be done considering Burimari port, but infrastructural development has to be done keeping in view the common man.
8	Health system of this area	All Participants	<p>Nearly all the participants said that the health system of this area is terrible. Community clinic, upazila health complex, even in Sadar hospital don't have sufficient medical facility, and nowadays they don't even expect to get adequate service.</p> <p>Consequently, critical patients are taken to rangpur medical where they get proper treatment.</p> <p>At least 70 people in this area have died of silicosis due to excessive air pollution, and 100 more people are still infected.</p>

SI	Key Issues Raised	Participant/S Type	Response
			A large number of residences of this area suffer from Asthma, silicosis, shortness of breath and other critical diseases due to open stone crushing miles.
9	Environmental awareness of stone crushing company	All Participants	<p>Majority of the participants blame 'Stone traders' for environmental pollution as crushing rocks in the open air, the dust of the rock spreads in the air and pollutes the air.</p> <p>After being washed by rain water, this dust goes into rivers or reservoirs and causes water pollution.</p> <p>As there is a possibility of air pollution by the project, the authority should take necessary steps to reduce the environmental pollution.</p> <p>Wastes of this project should be kept or managed away from localities.</p> <p>If the stone crushing traders water regularly, the dust will be reduced in this area.</p> <p>Regular monitoring by law enforcement agencies will reduce such irregularities.</p>
		Mr. Sayed, President, C&F Agents Union	<p>At present, the volume of Burimari land port-centric business has increased many times over. The area of Burimari land port is presently approximately 11 acres. Even if the size of the port is increased 10 times more than it is now, it will not be enough to run port based businesses. Neither the traders nor the appropriate authorities are responsible for reducing the environmental pollution by the stone business. The stone workers are risking their lives to earn a living. The stone business is one of the major contributors to the region's economy. According to the government policy, all the stone crushing businesses are supposed to operate within 3 km of the port area, but at present the stone business establishments are spread over an area of about 8 km. Therefore, administrative monitoring is very important for sustaining the business and keeping the environment safe.</p>
10	Development of Land Port Immigration related issues and other facilities	Md. Anwar Hossain (In-Charge, Immigration Police, Burimari land port)	The current situation of rest, toilets, food intake for our immigrant passengers is very inadequate compared to other countries in the international arena. Since they have to face immigration first by crossing the border from a neighboring country, their first impression of our country will be positive once immigration meets international standards. So, we want a tidy, tidy, clean immigration.
11	What should be kept in mind for this project?	All Participants	<p>There are no residence facilities for drivers and staff from India or other countries, and even there are no toilet or bathing facilities. These issues must be kept in mind planning this project.</p> <p>A mosque should be built within port boundary so that workers can pray in time properly.</p> <p>To reduce road accident a foot over bridge needs to be installed in the land port area.</p>

SI	Key Issues Raised	Participant/S Type	Response
			The labors are often victims of accidents. Contrarily, there is no insurance facilities for them. There should be an insurance facility so that they can get support from.



Figure: Consultation Meeting, Burimari Land Port, Burimari, Patgram, Lalmonirhat

Summary of FGD with Burimari Local Importers/ C&F Agents (II)

The FGD with Local Importers/ C&F Agents was conducted on 13th December 2021.

Date	Location	Participants
13/12/21	Conference hall, Burimari Land Port Office, Burimari, Patgram, Lalmonirhat	10 (men)

Summary of Queries, Concerns and Suggestions Raised by Local Importers/ C&F Agents during FGD Sessions (II)	Responses
<p>1) Development activities of Burimari Land Port are going to start in your area under Bangladesh Land Port Authority. What do you know about this project? If you know, tell us the details of what you know about the project. (Tell us in detail about the project's start time, about the land acquisition, how you know about the project.)</p>	<p>Respondents said they did not know anything about land port development activities. At present, the perimeter of the land port is not sufficient for trade, they said. If the modernization of the port is done and perimeter of the land port is increased, it will bring positive change for the people of the port area. The size of the port yard needs to be increased. According to them, they conduct business properly by paying revenue / port charges etc. to the port authorities, but they are not getting the kind of trade-friendly benefits they are supposed to get from the port. Therefore, they think that the port development activities will bring opportunities for improvement in their area.</p>
<p>2) What are the advantages and disadvantages of the project in the area? Who do you think could be directly affected by the project and who could be indirectly affected? Whose interest do you think is involved in land port development? What are your comments / suggestions for problem solving?</p>	<p>They believe that the development of land ports will increase the dynamism of trade. They said that the yard (car park field in the local language) should be increased in the port during the discussion. At present the number of cargo vehicles entering the port is approximately 400/500 daily. Increasing the size of the yard will almost double the number of cargo vehicles entering. They expressed the view that a better banking system needs to be formulated in the port area. As no banking system is available inside the port, they need to move away from the port to complete their banking activities. As a result, their time is wasted. Moreover, in order to develop the port, the roads adjacent to the port will also have to be developed, as a result of which the port-centric traffic congestion will be eliminated, more cargo vehicles can enter, which will also increase the revenue of the government.</p> <p>The current weight scale of the port is flawed. If the port is developed, a weight scale that provides accurate measurements will be established, which will reduce the amount of losses to traders.</p> <p>When the respondents were asked about the inconvenience caused by the project, they said that if the port is to be expanded as part of its development activities, land will be required. In that case if the land is acquired in a place where there is privately owned land then the land owners will face loss. But if the government compensates them for the land at a reasonable price, they think the acquisition will not cause much trouble.</p> <p>Besides, the environment of the huge area adjacent to the port is unsuitable for human health. Many people suffer from respiratory problems due to dust and sand.</p>

Summary of Queries, Concerns and Suggestions Raised by Local Importers/ C&F Agents during FGD Sessions (II)	Responses
	Once the project starts, the level of environmental pollution will increase.
<p>3) Please discuss in detail what issues should be given priority in land port development project planning and why. (E.g., port infrastructure, what can be linked to modernization, what needs to be considered for residents and business groups living in the port and related areas, etc.)</p>	<p>They mentioned that some issues should be given priority in the formulation of the development plan. Such as:</p> <ol style="list-style-type: none"> 1) Port area size should be increased 3 times more than at present 2) The highway adjacent to the port has to be upgraded to 4 or 6 lane roads, starting from Zero Point to at least 10 km. 3) In order to reduce the amount of dust, regular water sprinkling should be done by water truck 4) Parking area should be increased 5) A bypass road should be constructed along the railway line 6) Planned sewerage system should be maintained 7) Stone-breaking businesses scattered over a wide area should be given the opportunity to conduct business by enclosing the boundaries in a certain place. 8) The bank is located about 3 km. away from the port. Therefore, it is important to set up bank branches inside the port to prevent wastage of time for traders. 9) It is necessary to set up a mosque inside the port. 10) Modern fire service system is required. 11) It is necessary to increase the skilled manpower in different institutions or departments of the port.
<p>4) What will be the impact on the women in your area due to the difficulties that may/will occur as a result of the project? Please provide us with a detailed idea of how safe the environment in your area is for the movement of women and children.</p>	<p>They believe that the project will not have a specific impact on women and children, but on all the people living in and around the project area. They said the Burimari area is safe enough for everyone, men and women alike.</p>
<p>5) If there have been any incidents of violence / torture against women in the area before, please tell us about it. Please tell us in detail if there have been any conflicts / conflicts with women workers / women workers groups who have come to work under any project or participated in any work before.</p>	<p>There have never been any incidents of violence or torture against women in the area. Women workers are working in the agricultural sector and in stone breaking businesses without any hindrance.</p>
<p>6) In the interest of the project there is a large section of workers who will come to your area from different districts and stay here for the sake of work. What could be the problem due to workers coming from elsewhere in the project? What are your comments / suggestions for solving this problem? What percentage of local people in your area do you think could participate in the project as workers? Provide an idea of the state of child labor in the area. Do you think that women as workers can / will participate in various activities of the project? What is your advice in this regard? Please let us know if there are any subsequent workers' grievances, abuse or any kind of untoward incident. (Gender based violence, sexual</p>	<p>They said workers coming to work on the project will not have any problem working or staying in the area. But local people should also be employed as laborers according to their qualifications in the project. Local people will be interested in working if there is an opportunity to be involved in any kind of project work. Women will also be able to work as workers in different stages of the project. Women workers are working in stone breaking business establishments.</p> <p>There is no fear among the workers. However, in case of any unwanted incident, a committee consisting of local administration, elected representatives, local businessmen may be formed to resolve the grievances. They said there are separate organizations for C&F employees in their area. This organization is trying to solve any problem of the employees at any time. Apart</p>

Summary of Queries, Concerns and Suggestions Raised by Local Importers/ C&F Agents during FGD Sessions (II)	Responses
violence, child labor, forced labor, inequality in wages or other employment opportunities for female workers, etc.)	from this, such committees can be formed with importers, C&F Staff Association etc.
7) What kind of problems do you think might arise if land is acquired in the interest of the project? Explain the details of the compensation process when an acquisition is made. If you have any previous acquisition experience in your area, discuss it with us. If the acquisition is done, discuss what you think would be better to compensate for the loss.	They said that if land was acquired in the interest of the project in the port area, there would be no special problem if the land owners were given proper compensation. Privately owned land was acquired before the port was established on the present Burimari land port site. Many of those who lost land in the acquired area later bought land near the Zero Point area on the north side adjacent to the port and settled there. All those whose land has been acquired were compensated for the land as far as they know. However, it is best to use demesne land without acquiring privately owned land.
8) To whom/ where will you go to resolve any kind of complaint/problem arising out of the project? Do you know if there is any effective committee/arrangement in resolving the complaint? If so, tell us about the working style of that committee. (Whether there should be a committee, with whom this committee should be consisted of, what kind of work should be done, etc.)	A committee consisting of concerned authorities and local people's representatives may be formed to report any grievances or problems related to the project.
9) Do you think any special aspect should be taken into consideration while using different resources (such as fuel, gas, water, sand, stone, road construction raw material etc.) used in the project? Can the use of the mentioned resources cause environmental pollution? If so, what are the measures that can be taken to prevent pollution?	Respondents have previously suggested that the project could increase environmental pollution. They suggest that the materials or construction materials used in the project should be kept in a designated place and covered with tarpaulin material when the work is stopped to prevent the spread of such materials on the roads.
10) Will the project have any impact on roads, environment and canals / rivers? If so, what kind of impact? What are your comments / suggestions for problem solving?	Due to the project, the highway used at present may be further damaged or the movement of people may be disrupted. However, they think that it is a temporary effect. They do not think that any kind of canal or river is likely to be damaged
11) Give an idea about the existing educational institutions in your area. (Number of primary, secondary, higher secondary educational institutions / your satisfaction with the quality of education provided in the educational institutions / infrastructural condition of the educational institutions etc.). Do you think any school / college / madrasa / cultural heritage / historical place in your area will be affected by the impact of this project? If this happens, what is your advice to avoid or compensate for the loss?	Excessive dust, noise, busy roads, etc. make children reluctant to go to school. Stone-crushing machines are supposed to be installed at least 300 yards away from the school, but the stone-crushing businesses are scattering them in an unplanned manner. Even if no educational institution is likely to be directly affected due to the project, it may worsen the existing situation.
12) Do you think that the local area's religious institutions, historical and traditional establishments will be damaged due to the	They said no religious institutions, historical structures are likely to be damaged due to the project.

Summary of Queries, Concerns and Suggestions Raised by Local Importers/ C&F Agents during FGD Sessions (II)	Responses
project? What are your comments / suggestions for problem solving?	
13) Describe in detail the state of healthcare in your area. (What are the names of the health care providers in the area, whether they have adequate manpower, adequate medicine or medical equipment, what level of organization do you usually visit to receive healthcare etc.)	In this regard, they said, Patgram Upazila Health Complex is located about 15 km away from Burimari. Besides, there is no other medical service provider nearby in their area. People usually go to the local pharmacy or village doctors for any ailment early. There is no first aid facility inside the port.
14) State which media might be most effective in conveying any information about the project. (Miking, leaflets, magazines, etc.)	Miking, giving notices to local newspapers to get information about the project can be fruitful.
15) What percentage of houses in this area have an electricity connection? Describe the current state of load shedding.	All the houses in this area have electricity connection. However, due to the high level of load shedding, people are not able to enjoy that benefit despite having an electricity connection.
16) Name some of the NGOs operating in your area. Tell us what programs these NGOs run. Please discuss about the local people's level of involvement and the reason for such involvement with the NGOs. What kind of organization is working / has done in the past to raise awareness about environmental pollution?	NGOs like BRAC, Grameen Bank, TMSS, RDRS etc. are conducting their loan, education related activities in the area.



Figure: FGD with Importer and C&F agent representatives

Summary of FGD with Burimari Community Male (III)

Date	Location	Participants
10/12/21	North side of the Land Port boundary wall, Burimari, Patgram, Lalmonirhat	13 (men)

Summary of FGD Sessions with community males (III)	Responses
<p>1. Development activities of Burimari Land Port are going to start in your area under Bangladesh Land Port Authority. What do you know about this project? If you know, tell us the details of what you know about the project. (For example, details about when the project will start, about land acquisition, how you know about all these things etc.)</p>	<p>Participants present in the meeting said, they did not know of any projects related to the development activities of Burimari land port. One said he had heard from a person working at the port that the port would be expanded, separate parking would be provided, there would be a fire service, and a weight bridge (weight scale) would be built, but he did not know when that work would begin. He doesn't know anything. He added that he had heard that no land would be acquired on the port's north side.</p>
<p>2. What are the advantages and disadvantages of the project in the area? Who do you think could be directly affected by the project and who could be indirectly affected? Whose interest do you think is involved in land port development? If any problem arises, what are your comments / suggestions for solving the problem?</p>	<p>One of the respondents thinks that the project's impact will be economic development of the area, which means that the socio-economic condition of the people of the area will also be better. He said, "Coming of people from other areas to work in the project will actually increase the sales of food hotels, grocery stores, etc. in our area which will be good for us." However, he said that expanding the port could be started on the land lying fallow next to the existing port. By using the amount of space available there, the port can be increased 3/4 times more than the current one.</p> <p>Talking about the inconvenience, the respondent said that due to lack of proper management/monitoring, the authorities are not able to manage the activities of the port properly. If the port is enlarged, it will be more difficult to manage its activities properly. The environment of their area is already much polluted due to the stone crushing businesses that import the stone through the port. He added that 90% of the people in the area have dry cough.</p>
<p>3. What will be the impact on the women in your area due to the difficulties that may / may not occur as a result of the project? Please provide us with a detailed idea of how safe the environment in your area is for women and children.</p>	<p>Respondents said the project would not significantly impact women and children in the area. The Burimari area is completely safe for women and children to move around. However, they believe that once construction begins, environmental pollution in the area may increase, which could increase health risks for people of all walks of life, not just women and children.</p>
<p>4. If there have been any incidents of violence / abuse against women in the area before, please tell us about it. Please tell us in detail if there have been any conflicts / conflicts with women workers / women workers groups who have come to work under any project or participated in any work before.</p>	<p>All the respondents present said that no incident of violence against women has taken place in the area before. No untoward incident has ever taken place with a female worker.</p>

Summary of FGD Sessions with community males (III)	Responses
<p>5. In the interest of the project a large number of workers that will come to your area from different districts and stay here in the interest of work. What could be the problem due to workers coming from elsewhere for the purpose of working in the project? What are your comments / suggestions for solving if there is any problem regarding that? What percentage of local people in your area do you think could participate in the project as workers? Provide an idea of the state of child labor in the area. Do you think that women as workers can / will participate in various activities of the project? What is your advice in this regard? Please let us know if there has been any previous worker dissatisfaction, abuse or any kind of untoward incident. (e.g., Gender-Based Violence, Sexual Violence, Child Labor, Forced Labor, Inconsistencies in Wages or other work opportunities for women workers, etc.)</p>	<p>They said a large portion of the workers intended to work on the project would come from other areas, but there would be no particular difficulty for their area. However, if the supply of all the workers is brought from elsewhere, many people in the area will be deprived of working as laborers. This may cause dissatisfaction among the locals. All those present at the discussion said that there are skilled workers in their area who are skilled in many kinds of work like cutting soil, working on stone breaking machine, working on stone to powder making machine, etc.</p> <p>Earlier, two workers had fallen to their deaths while working at the port, they said, adding that there were no major workers' accidents or grievances in the port area.</p>
<p>6. Do women in your area face any obstacles in getting education, engaging in income generating activities, etc.? What is women's participation rate / opportunity in local government and other government organizations? What kind of income-generating work do widows / divorced women usually engage in to support their families? Do they have the opportunity to earn enough?</p>	<p>Attendees said that 70% of the girls in the Burimari area are involved in education, but in the case of boys, the rate is lower, at 30%. The reason for this, they said, is that most of the families, driven by scarcity, take their children away from education and engage them in various income-generating activities. However, they said that they are very careful about their children's education because the girls will not be able to work outside the home and earn a living, so the girls are more involved in education.</p> <p>They know that there are 2 government primary schools in almost every ward in the area and 1 high school in the union. There is a college in Patgram. Besides, there are 7/8 more private educational institutions at pre-primary and primary level.</p> <p>Widows or divorced women in the area usually work as laborers and make a living by sewing.</p>
<p>7. Do men and women enjoy the wealth they deserve in the distribution of wealth and land in your area? What is the ratio of female land owner to male land owner in this area?</p>	<p>In most families, women do not get the resources they deserve. In some families, it may be seen that a woman is being paid by her brother the same amount of property as she deserves.</p>
<p>8. Is there a practice of child marriage in the area? If so, what is the percentage of child marriage? What are the causes of child marriage? Is there a dowry system in marriage? Please give us a detailed idea about all these.</p>	<p>Respondents said that 10% of child marriages are prevalent in their area at present. And this practice is more common in extremely poor families. However, the practice of exchanging dowry in marriage is seen in 100% of the families in the area. Dowry is a social custom in the area, they said.</p>
<p>9. What kind of problems do you think might arise if the land is acquired in the interest of the project? Explain the details of the compensation process when an acquisition is made. Does the</p>	<p>In this regard, the participants said that today's land port has been built in the place where almost every one of the communities on the north side of the port used to live. The government has already acquired their land and built the port. They have moved from</p>

Summary of FGD Sessions with community males (III)	Responses
<p>acquisition create any inconvenient situation especially for women? If you have any previous acquisition experience in your area, discuss it with us. If the acquisition is done, discuss what you think would be better to compensate for the loss.</p>	<p>that place to current place. If this place is acquired again, it will be a big concern for them. This is because the place where they have now bought land and settled anew was formerly a pond. They bought land in that pond and later filled the pond to settle. They have had to spend a lot of money for land filling purpose.</p> <p>Moreover, at present it is very difficult to get land for purchase in the vicinity of the port area. Because, the land owners here are able to earn five lakh (500,000) taka a year by renting land to the stone crushing traders. So no one wants to sell land in this area. They said that they have been living in the present place for a long time and all their income-based work has been developed based on this place. Once they have moved. Now if they have to relocate again, their standard of living will be severely affected. They will lose the opportunity to earn a living.</p> <p>Earlier they were verbally informed about the acquisition of land. Then suddenly the people appointed by the authorities came and took pictures and videos of their place, settlement etc. The process of compensating them for the acquisition was not easy. The distance from their settlement to Lalmonirhat Sadar is about 100 km. Every affected person had to travel to Lalmonirhat Sadar about 4/5 times.</p> <p>Participants also said that many well-to-do families have become extremely poor over the years due to the acquisition of arable land. Because those families could not use the compensation to build a new source of income, they were not skilled in any kind of work other than farming. Arable land was their economic strength.</p>
<p>10. Are there any indigenous / ethnic groups living in the project area? If so, what kind of problems might they have due to the project? Tell us your opinions / suggestions to solve that problem.</p>	<p>It is learned from the discussion that there are no indigenous / ethnic groups living in the project area, they are not likely to be harmed in any way.</p>
<p>11. To whom / where will you go to resolve any grievances / problems arising out of the project? Do you know if there is any effective committee / arrangement in resolving the complaint? If so, tell us about the working style of that committee. (E.g., whether there should be a committee, who should have this committee, what kind of work should be done, etc.?)</p>	<p>They are of the view that the port authorities themselves can solve any problem related to the project.</p>

Summary of FGD Sessions with community males (III)	Responses
<p>12. Do you think any special aspect should be taken into consideration while using different resources/ materials used in the project (such as fuel, gas, water, sand, stone, road construction raw material etc.)? Do you think that using the above-mentioned resources/ materials can cause environmental pollution? If so, what are the steps that can be taken to prevent environmental pollution?</p> <p>13. Will the project have any impact on roads, environment and canals / rivers? What kind of impact can it have? What are your comments / suggestions for problem solving?</p>	<p>Respondents said that while using the construction materials used in the project, care should be taken not to pollute the environment. Because the environment of this area is already in a very bad condition. They further suggested that when the construction work for the development of port infrastructure starts, if the concerned people make arrangements for regular sprinkling of water on the roads, then the rate of dust and sand spreading in the air can be controlled to a great extent.</p> <p>Participants all felt that the project would impact roads and the environment. They said that the current size of the highway adjacent to the port is not enough for the movement of vehicles and people in the port. It is necessary to increase the size of this highway in view of the number of vehicles currently used in the import-export activities of the port. Due to the severe traffic congestion for the cargo trucks, the cargo vehicles arriving at the port have to spend an unusual amount of time unloading the goods and returning. Ordinary passenger autos, vans, motorcycles, etc., often do not have space for movement. They feared that the traffic congestion could increase further when work on the project begins.</p> <p>They said the severe traffic congestion caused by the lack of adequate space could make the environment in the area even direr.</p> <p>Some people think that the Dharala River beside the port may be further damaged due to the project. According to them, the sewerage system of the port is inadequate, due to lack of proper sewerage system inside the port, muddy water enters the main road adjacent to the port and the roads are almost always dirty. They think that this situation may become more evident when the project starts.</p>
<p>14. Do you think any school / college / madrasa / cultural heritage / historical place in your area will be affected by the impact of this project? What is your advice on how to avoid or compensate if something like this happens?</p>	<p>They believe that the project will not harm any educational institution or any cultural or traditional place in the area.</p>
<p>15. Do you think that the project will damage the religious institutions and historical sites in the area adjacent to the project? What are your comments / suggestions for solving such problems?</p>	<p>They think no religious institution or any traditional installation in the area will affect the project.</p>
<p>16. Explain in detail the state of healthcare system in your area. (e.g., the type of health care providers in the area, whether they have adequate manpower, adequate medicine or medical equipment, what type of organization you usually visit, etc.?)</p>	<p>Discussions on healthcare in the area revealed that the number of quality healthcare providers is almost non-existent. People of the area have to rely on Lalmonirhat Sadar or Rangpur Sadar to get good medical care. They said that Lalmonirhat district proper is about 100 km from Burimari. It is difficult and time consuming for people to go to Lalmonirhat for medical treatment due to its remoteness and unavailability of transportation. Most people depend on trains to travel from Burimari to</p>

Summary of FGD Sessions with community males (III)	Responses
	Lalmonirhat. However, the departure schedule of the train is indefinite and the time required for the journey is not less. If you want to go to Lalmonirhat by road, first you have to go to Patgram, then you have to go to Lalmonirhat by bus from there, it takes more cost and time. Respondents said they receive medical services mainly from local pharmacies. However, if the illness is more, they travel to Lalmonirhat or Rangpur as needed.
<p>17. Give an idea about the existing educational institutions in your area. (E.g., number of primary, secondary, higher secondary education institutions, your satisfaction with the quality of education offered in educational institutions / infrastructural condition of educational institutions, scholarship system, etc.).</p>	Respondents said that although the number of primary schools in their area is adequate, the number of secondary and higher secondary level educational institutions is insufficient. While the standard of education at the primary level is quite satisfactory, the standard of education at the secondary level is not so satisfactory.
<p>18. Which media can be most effective in getting any information about the project to the masses? (e.g., miking, leaflets, magazines, etc.)</p>	The participants said that it would be more effective to conduct area-wide miking, notice and door-to-door meetings to reach the public with any information about the project. They also said that it is also help to inform the people in their respective areas about the project through local public representatives/ local government leaders.
<p>19. How is the communication system in your area? Is there a road that breaks or disrupts travel? Is there enough road? If not, where is the new road needed? What type of vehicle is used as means of communication in your area?</p>	Participants said that the condition of roads in the area is not good. The road from Burimari port to Patgram through Burimari market is almost broken. Attempts to repair the road have not been made as long as heavy freight vehicles are exceeded. The stone breaking business is spread in a scattered or unplanned way upto about 5/6 km from the port area. Until then. In the month of November 2021, three heavy trucks carrying stones overturned. Such accidents often happen. Respondents said that a bypass road is needed along the highway from Burimari port, taking people directly to Patgram road. They think that if this bypass road is built along the railway line, it will be good for the people. Engine driven vans, rickshaws, autorickshaws, motorcycles, bicycles, Mahindra (large size autos), buses and trains are used as vehicles in the area. There is no direct train from Burimari to Dhaka. From Burimari you have to reach Lalmonirhat first and then catch another train for Dhaka. They said that the importance and busyness of Burimari land port is increasing day by day, so launching a direct train from Burimari to Dhaka to improve the communication system of Burimari would be very beneficial for further improving the socio-economic condition of the area.
<p>20. Since there is a lot of freight trucks / vehicles plying in the port area, do you have any problem with this? How is the safety of travel? For example, whether there is any theft at night? If yes, in which point or area such incidents happens mostly? What is your advice to solve such problems?</p>	The participants unanimously stated that there is no security risk in the area. They said that anyone can move around safely with a few lakhs of cash in hand. There is no risk of theft or robbery.

Summary of FGD Sessions with community males (III)	Responses
<p>21. What is the type of land in the project area (mouza area of the project) (one crop / two crop)? What crops are usually produced on the land? What kind of crop is produced in which season / month? If a land does not produce any crop all year round, what is the use? When is the land vacant? Are fallow / vacant lands used for work?</p>	<p>Double crop lands are commonly seen in the project area. The main crops grown here are Amon, Maize and Tobacco. At present large portion of land in Burimari area is leased to stone traders where they are conducting stone crushing business.</p>
<p>22. What kind of trees do you usually have in your area? How is the tree's price determined / at what price is it bought and sold?</p>	<p>Mango, Jackfruit, Litchi, Coconut, Betel nut, Mahogany, Guava, Kadam, Blackberry etc. trees are more common in the area. The value of a tree is usually determined based on its size.</p>
<p>23. What type of ownership of the trees can be seen on the side of the road? How are these trees sold? Who gets the money if sold?</p>	<p>Respondents said that the trees along the roadside include government trees as well as privately owned trees. The tree owner bears the selling price of privately owned trees.</p>
<p>24. If there are ponds / lakes in this area, for what purpose are they used? Is fish farmed in the ponds throughout the year? What fish is farmed? What is the price of fish?</p>	<p>They said that ponds / lakes are less visible in Burimari area. It goes without saying that there are almost no ponds where fish are farmed.</p>
<p>25. What is the percentage of mobile usage of women and men in this area?</p>	<p>According to the discussion, 30% women and 80% men in the area use mobile phones.</p>
<p>26. What percentage of households in this area have electricity connection? Describe the current load shedding situation in the area.</p>	<p>Hundred percent of the houses in this area have electricity connection. But loadshedding is plentiful. There is an average of 8 to 14 hours of electricity in 24 hours</p>
<p>27. What percentage of people in this area use internet? Who uses the Internet more and what is the purpose of using internet?</p>	<p>About 60% of the people in the area use the Internet. Internet usage is more prevalent among relatively young people. They use the internet for Studying, Facebooking, YouTube, playing games, communicating with expatriates. There are about 2-3% expatriates in this area.</p>
<p>28. Name some of the NGOs operating in your area. Tell us what programs these NGOs run. Discuss in detail how much the area's people are involved with the NGO and for what reason. What kind of organization is working / has worked in the past to raise awareness about environmental pollution?</p>	<p>NGOs like BRAC, Grameen Bank, Asha, Popi, TMSS, Padakshep, RDRS etc. are conducting their activities in the area. A large part of the activities of NGOs are related to microcredit. About 90% of the people in the area are involved in loan or savings activities of NGO organization.</p>



Figure: FGD with community male

Summary of FGD with Burimari Community elite persons (IV)

Date	Location	Participants
11/12/21	Roqun's House (Rowshon Villa), Tatipara, Burimari, Patgram, Lalmonirhat	10 (men)

Summary of FGD Sessions with community elite persons(iv)	Responses
<p>1. A development initiative of Burimari Land Port are going to start in your area under Bangladesh Land Port Authority. Do you know about this project? If you know about the project, tell us in details. (Tell us about the project's starting time and land acquisition, how did you know?)</p>	<p>Almost all the respondents answered that they had been hearing this issue in public for a few days. However, they said that they had no specific idea regarding this issue. Some added that, they didn't hear anything from adjacent authority. Notwithstanding, all the respondents wanted a proper development therein. When they were asked about starting time and acquisition process, they responded that they had no idea when the project would start. But majority of them had expressed perturbation over land acquisition. According to them, the land owners had to face a huge financial loss in acquiring the land of the present port.</p>
<p>2. What are the advantages and disadvantages of this project you think? Who do you think could be directly affected by the project and who could be indirectly affected? Whose interest do you think is involved in land port development? What are your suggestions for problem solving in this project?</p>	<p>After giving a brief idea about the project and then asked them about its advantages and disadvantages, nearly all the respondents said that it would be an economic development for the people of that area. In this regard, Mr. Roknuzzaman Rokon, a stone trader, said, "if the port infrastructure develops, our stone imports will definitely increase, which will create more jobs opportunity in my organization that will be good for all. Based on his words, Mr. Abdus Salam said, "The Indian driver-helpers who carry these stones have to stay and eat here until unload the goods. As a result, Restaurants, hotels, tea stalls owner will definitely be benefited." On the question of loss, they have expressed concern about getting a fair price against land acquisition. Majority said that if this port is developed, it will be beneficial for all. Regarding the possible problems, the Imam of Zero Point Mosque, Mr. Saeed Ahmed said, "Road accidents are very often here, each and every day we heard about road accident. If the authority won't take proper road management plans, there is a good chance to increase road accidents here." Soon after, Mr. Ramzan Ali, a primary school teacher, said, "There may be obstacles in such work, but it will be easy in an orderly fashion if there is a proper plan."</p>
<p>3. What will be the impact on the women in your area due to the difficulties that may / may not occur as a result of the project? Please provide us with a detailed idea of how safe the environment in your area for women and children?</p>	<p>Majority said, they did not think the project would have a special impact on women and children. However, Hafeez Noor Mohammad said that children will have a challenge going to school or college. Agreeing with his statement, Mr. Rokon said that in the case of random movement of trucks, cars etc. one has to sit in traffic jams for a long time and takes breaths with dust in road which will create various diseases. All the participants on the question of safety and security responded that this area was very safe for movement. Shahjahan Mia said, "There is no such thing like theft</p>

Summary of FGD Sessions with community elite persons(iv)	Responses
	or snatching in this area. He can't even remember that such a thing happened. Even walking on the street carrying with 50 lakh, 1 crore taka will not be a problem here". Altaf Hossain, ward president of rolling party and businessman, said that there were no incidents such theft, looting or harassment of women in their area. He said that their reputation for security and safety was appreciated by all who step in to this port.
<p>4. If there have been any incidents of violence / abuse against women in the area before, please tell us about it. Please tell us in detail if there have been any conflicts between women workers and women workers groups who have come to work under any project or participated in any work before in your area.</p>	<p>In reply, they said that they have not heard of any incidents of violence against women in that area. In this regard, Mr. Altaf Hossain said that people always come to him with various issues being a political leader. He added that he had to keep his eyes to everyone in that area. His ears could not be avoided if there was any incident of violence against women happened. None of them can remember whether women workers have worked before in Land port project, and even if someone worked, they didn't think there's a such problem.</p>
<p>5. In this project, there are many workers who will come to your area from different districts and stay here. What could be the problem due to workers coming from elsewhere in the project? What are your statements / suggestions for solving this problem? What percentage of local people in your area do you think could participate in the project as workers? Provide an idea of the state of child labor in the area. Do you think that women workers can / will participate in various activities of the project? What is your advice in this regard? In case of any kind of worker dissatisfaction, torture or any kind of untoward incident, please let us know. (Gender based violence, sexual violence, child labor, forced labor, inconsistencies in wages or other job opportunities for female workers, etc.)</p>	<p>When they were asked about the problems of the workers from outside, Mr. Shahjahan Mia said that there was no problem if project authority would fair wages. Before finishing his speech, Mr. Saeed Ahmed said that the workers' accommodation should be fair. He added that lack of adequate toilets and bathrooms was a major problem. He further added that if those were adequate and fair wages were paid, they would have no problem. All the participants agreed to this statement. Regarding the recruitment of workers in the project, some of them said in a depressing voice that no workers were taken from the area for the construction of the present land port. So in the new project, everyone in this area should be given a job. "Especially those who will lose their land or business so that they can be involved in this project. Child labor is not very common but it cannot be said that there is no such thing at all. Those whose financial condition is miserable, they have to work to feed their family," said Mr. Sajjad. Almost all the respondents confessed that there is inequality exists between men and women but some of them pointed out the rationale of this inequality. According to them, men are physically more capable than women in manual labor that is why wage inequality exists</p>
<p>6. Do women in your area face any obstacles in getting education, engaging in income generating activities, etc.? What is women's participation rate / opportunity in local government and other government organizations? What kind of income-generating work do widows / divorced women usually engage in to support their families? Do they have the opportunity to earn enough?</p>	<p>Some of them said that women were more educated than men in that area in response to this question. Abdus Salam said that his daughter-in-law was an B.A. On the other hand, his son could not cross the school boundary. He added that there were many examples in regards. Another said that women had less opportunity to earn because there was more physical work in that area as a result women's participation was less in physical labor. "Some women have been doing well by sewing clothes and some others are conducting hotel business for many years," Shahjahan Mia Said.</p>

Summary of FGD Sessions with community elite persons(iv)	Responses
<p>7. Do men and women get the wealth they deserve in the distribution of wealth and land in your area? What is the ratio of female land owners to male land owners in this area?</p>	<p>Most of the respondents on the issue of land distribution said that the distribution of land in their area was done in accordance to Islamic and state law. No one could say much about actual ratio of land ownership between man and women. However, one of the attendees said that if a man was 80, that a woman would be 20.</p>
<p>8. Is there any practice of child marriage in the area? If so, what is the percentage? What are the causes of child marriage? Is there any dowry system in marriage? Please give us a detailed idea about all these.</p>	<p>In response to this question, Mr. Enamul said, “though recently child marriage is less, it was more a few years ago. However, if you still search, you will find the news of child marriage.” When they were asked about the reasons for this child marriage, Mr. Ramzan Ali said, “there may be various reasons, but the family’s financial condition is considered the main reason for child marriage. Almost everyone agreed with him on this point. In the question of dowry system, majority of them said that dowry was very often in that area.</p>
<p>9. What kind of problems do you think might arise if the project acquired the land? Explain in details of the compensation process when an acquisition is made. Does the acquisition create any inconvenient situation especially for women?</p>	<p>They think that the biggest problem in acquiring land for the project is not getting a fair price. Some said that due to irregularities in the distribution of land price, market price and difference in mouza price, land owners are likely to suffer huge financial losses. When they were asked about past experience regarding land acquisition for present land port, they said, the owners of the lands acquired during the construction of the present port had to pay bribes to various offices to get compensation. They added that they had to travel daily to get the money they deserved. Many of them complained that they were paid far less than the market value. When they were asked how the acquisition could be compensated, Abdus Salam said, those whose land or infrastructure would be damaged would have to be properly compensated and their losses could be compensated if the project could provide them with employment. With his words, Altaf Hossain said, “homestead land is scarce.”</p>
<p>10. Are there any tribes / ethnic groups in the project area? If so, what kind of problems might those tribes have because of the project? Tell us your opinions / suggestions to solve that problem.</p>	<p>In response to this question, they said that there was no ethnic group living in their area.</p>
<p>11. To whom / where will you go to resolve any problems arising out of the project? Do you know if there is any effective committee / arrangement in resolving the complaint? If so, tell us about the working style of that committee. (Whether there should be a committee. Who should this committee be with, what kind of work should be done, etc.)</p>	<p>when they were asked who they would go to if there was any problem related to the project, Mr. Sajjad replied, “We have to talk openly to the leaders concerned about the problem. This will solve most of the problems. If the situation will be more complicated, the resolving committee will find a solution by contacting the port authorities. However, there is no separate conflict resolving committee.” All of the participants agreed that if there is such committee, the workers’ rights will be protected and the working environment for all concerned will appeasement. When they were asked who would be included in the committee, Altaf Hossain said he</p>

Summary of FGD Sessions with community elite persons(iv)	Responses
	believed it would be better to form a committee comprising labor leaders, public representatives, government officials, law enforces agencies, BGB, political leaders and dignitaries from all walks of life. All the participants agreed to this statement.
<p>12. Do you think any special aspect should be taken into consideration while using different resources used in the project (such as fuel, gas, water, sand, stone, road construction raw material etc.)? Can the use of the mentioned issues cause environmental pollution? If so, what are the actions that can be taken to reduce such pollution?</p>	<p>In response to this question, Altaf Hossain said that if the resources were not used properly in this project, environmental pollution and tremendous suffering of the people of the area will increase a lot. He added that if these materials will leave under open sky or bare land, there is a possibility of obstruction of pedestrians, which will be a suffering in regards to public movement. On whether there will be environmental pollution, Hafeez Noor Mohammad said that if cement, sand, rods, etc., cannot be covered, that will pollute the environment. He added that the environment that area had been polluted due to lack of proper management of stone traders at present. He further said that proper waste management was required in that project and authority should build a separate plant for waste management. Everyone agreed to his statement.</p>
<p>13. Will the project have any impact on roads, environment and canals/rivers? If so, what kind of impact? What are your comments / suggestions in this regard?</p>	<p>In response to this question, Mr. Rokon said that that was normal for a new project to affect the environment during construction negatively. He added, however, proper management must be taken to minimize it. He further added that other construction materials, including cement and sand, would be washed away by rainwater in rivers or reservoirs, harming the environment and animals. Therefore, to prevent such problems, an adequate shed should be built to store construction materials so that they do not harm the environment under any circumstances.</p>
<p>14. Do you think any school / college / madrasa / cultural heritage / historical place in your area will be affected by this project? If this happens then what is your advice to avoid or compensate for the loss?</p>	<p>They said, “the project will not directly damage any school-college-madrasa or traditional cultural-historical site, but they may cause some indirect damage.</p>
<p>15. Do you think that any religious institutions, historical and traditional structures will be damaged due to the project? What are your statements/suggestions for solving this problem?</p>	<p>They said, there were no mosques, madrasas or other important structures in the project area.</p>
<p>16. Describe the state of healthcare in your area. (What are the names of the health care providers in the area, whether they have adequate man power, adequate medicine or medical equipment. How often do you visit there?)</p>	<p>When they were asked about the state of healthcare, Ramzan Ali, school teacher, “people in the area are deprived of proper healthcare. The nearest ham quack is 2 km away. So, when anyone get sick, he must get into a lot of trouble. Saidur Rahman said, “No specialized doctor provide service in this area.” “If there is a minor problem, we take medicine from the dispensary. If the situation seems a bit complicated, we plan to move Rangpur Medical College for better services.” According to all the respondents, the quality of services in the Upazila Health Complex is very low. Even the Lalmonirhat Sadar Hospital does not provide</p>

Summary of FGD Sessions with community elite persons(iv)	Responses
	good treatment. "If there is a hospital, that will be a blessing for us," they said.
17. Give an idea about the existing educational institutions in your area. (Number of primary, secondary, higher secondary education institutions, do you satisfy with the quality of education offered in educational institutions / infrastructural condition of educational institutions, scholarship system etc.).	When they were asked about the number of educational institutions, Almost all the respondents said, they could not say exact numbers. However, Hafeez Noor Mohammad said, "the primary school in Burimari Union is approximately 15 and only 1 secondary school exist in this area. There is only one college which is 6 km away. There is 7/8 Noorani Madrasha and one government Alim Madrasha in this union."
18. Which media can be most effective in conveying any information about the project? (Miking, leaflets, magazines, etc.)	They think miking is a good way to share any information. Altaf Hossain said, "Neither magazines nor leaflets can be understood and read by ordinary workers. So, we believe that miking or in person publicity is an effective medium."
19. How is the communication system in your area? Is there any road that breaks or disrupts travel? Is there enough road? If not, what is your idea about new road in this area? What type of vehicle is used as a means of communication in your area?	When they were asked about the communication system, everyone present highlighted that the condition of the roads in this area is the fragile. "Especially the condition of the road on the south side of the land port is very bad. Excess mud in rainy season and excessive dust in winter is significant problem in this area," Said Mr. Rokon. Enamul Haque said, "no repairing action has been done on this road for at least 15 years. Local government representatives of the area had promised more than once, but it has not been implemented even today. About one-third of the respondents thought that the only way to get through the road is to repair it. Others believe that the construction of some new roads, such as the construction of a bypass road from Burimari railway station to the land port, would greatly benefit the people of the area. They added this road would be constructed; local people of this area would be relieved from the present situation.
20. Since the port area has a lot of cargo trucks / vehicles, do you have any problem with it? How is the safety of travel? For example, whether there is any theft at night? Which place is considered? What is your advice to solve such problems?	Majority said, "road accidents are very often in this area as many vehicles move around within these narrow roads. However, theft and snatching do not happen in this area. This area has a reputation in this regard." All the participants unanimously agreed on this point.
21. What is the type of the land in the project area (mouza area of the project) (one crop / two crop)? Which crops are usually produced on this land? What kind of crop is produced in which season / month? When is the land vacant? Are fallow / vacant lands used for work?	In reply they said, "The lands in the project area are generally cultivated with aman paddy, tobacco and corn. In addition, many landowners here earn money by renting land to stone traders annually.
22. What kind of trees do you usually have in your area? How is the price of these tree determined / at what price is it bought and sold?	Some said, "We have no such specific tress but eucalyptus, Mehguni, Mango, Bamboo, Banana trees etc. are plentiful in this area. Mr. Enamul said, "there are no special rules for pricing trees. prices are determined by eye sight." According to Altaf Hossain, "there are other trees and more or less." When asked about the price, Mr. Rokon said that large trees are

Summary of FGD Sessions with community elite persons(iv)	Responses
	usually sold for TK 20,000-100,000, medium trees are also sold for TK 5000-20000.
23. What is the type of ownership of this tree that is on the side of this area? How are these trees sold? Who gets the money after selling?	In response to this question, Ramzan Ali said that most of the trees along the road are owned by government. And if it is sold, the money is deposited in the government treasury."
24. If there is a pond / reservoir in this area, what is it used for? Is this pond / reservoir cultivating all the year? what type of fish is farmed? What is the price of fish?	In reply, Mr. Ramzan Ali said, "Fish farming is very rare in this area." Some of the respondents said that most of the water bodies remain uncultivated. "However, Rui, Katla, Tilapia and other carp fishes are the most cultivated fish in this area," Mr. Altaf said. Mr. Rokon said that fish prices were much higher compared to other areas. In the rainy season, it is a little less, but it is much more at other times. Further, he gave an example that 1 kg size rui fish is available here for 250 Taka, sold elsewhere for 200 Taka.
25. What is the percentage of mobile usage of women and men in this area?	When they were asked about the percentage of men and women using mobile phones, some of them said, "approximately 40 percent of women use mobile phones, while men use about 60 percent of mobile phones
26. What percentage of households in this area have electricity connection? Is there any load shedding in your area? If occur, tell us in brief.	"All the houses in this area have electricity connection but there is a lot of load shedding," they said. Mr. Ramzan Ali said "at present there is at least 7/8 hours of load shedding in a day, which has put us in a lot of trouble. Students can't study well due to this problem." Everyone presents agreed with him.
27. What percentage of people in this area use internet? Who uses the Internet more and what they use internet for?	When they were asked about internet usage, one of them said, "those who have smart phones in this area use internet, whether they are men or women." Mr. Abdus Salam Said, "Facebook and YouTube are the most browsing sites here and recently I see some young use the internet to play online games. Mr. Sazzad said, "however, Imo, WhatsApp are widely used for talking.
28. Name some of the NGOs operating in your area. Tell us what programs these NGOs run? Tell us in detail how many people in this area are involved with the NGOs. Is there any organization who is working / has done in the past to raise awareness about environmental pollution?	In reply to this question, one said, "there are many micro-credit NGOs in this area namely Proshika, Grameen, Asha, RDRS etc. Apart from this, they do not remember that any NGO has come for social or environmental issue.



Figure: FGD with Community elite person

Summary of FGD with Burimari Truck labor association representative (V)

Date	Location	Participants
11/12/21	Burimari Bazar, Burimari, Patgram, Lalmonirhat	7 (men)

Summary of FGD Sessions with Truck labor association representative (v)	Responses
1. Development activities of Burimari Land Port are going to start in your area under Bangladesh Land Port Authority. Tell us the details of what you know about this project. (About the starting time of the project, land acquisition, how you know, please tell in detail.)	When asked about the acquisition and the project, almost everyone present there said that for some time they are hearing from the people, the surrounding area which is adjacent to the land port will be acquired. They do not know anything else. When asked if they had any objections to the project, all respondents present there said that they all favor development. And they believe that if this project executes there, it will make the life of the people in this area more beautiful. They said they have no objection in the interest of development.
2. Is your income or livelihood involved in any way with Burimari land port? If so, give us a detailed idea how it happen	When asked to know about this, the respondents said that most of the people in this area are involved in land port related work. Their livelihood is closely linked with the transportation of imported stones and imported goods from different countries and post-processing of transportation. There are at least 1500 stone breaking machines in operation in Burimari. And the population of this area is about 25000, of which a large part is involved with stone related activities. One of the participants said that he has been involved in stone transportation for the last four years and his family is doing very well with the income earned from this stone transport. He added that most of the people in the area are involved in stone related business. When it is asked if their livelihoods would be affected by the project, some participants who present there said that their income will increase significantly if the project is implemented.
3. What are the occupations usually the worker involved with in your area? Are there any specific types of work / occupation for men and women working as labor?	In response to this question, a respondent who present there said that about 90% of the people in this area are directly and indirectly involved with stone related work. Another participant said that apart from the locals in the area, government and private officials-employees who have been posted in the area are not directly involved in the stone business only. Except this, almost all the local people are involved with stone business, stone supply, stone breaking factory, etc. Another respondent said that " usually women in the area don't do much work outside of the house, those who are educated, if they work in office work, in that case they work easily".
4. Are there any organizations or unions in your area that work to protect the interests or rights of workers? If so, what is its organizational structure? Explain in detail, in what matters does this organization work?	One of the respondents said that there are several trade unions in our area, including labor unions and truck unions, working in the interest of the workers. If someone is sick or in danger then assistance provided to them. When one of our workers affected by Silicosis disease a few years ago, an NGO called RDRS bears all the medicine costs. In addition, trade unions are constantly look after for problems for their workers.

Summary of FGD Sessions with Truck labor association representative (v)	Responses
5. Do you know what labor law is? If you know, please tell	When asked about the labor law, the participants who present there, could not give a clear idea about it. The truck owners' association president said he had heard about the labor law but had no idea why and how it was enforced. Even till today no person or organization has told us anything about this. He said that the workers in this area have to work for their own self.
6. In the interest of the project, a large section of workers will come to your area from different districts and stay here for the sake of work. What problems could be happened due to workers coming from elsewhere in the project? What are your comments / suggestions for solving this problem? What percentage of local people in your area do you think could participate in the project as workers? Provide an idea about the situation of child labor in the area. Do you think that women as workers can / will participate in various activities of the project? What is your advice in this regard? Please let us know if there has been any previous worker dissatisfaction, abuse or any kind of unwanted incident. (Gender-based, Violence, Sexual Violence, Child Labor, Forced Labor, Inequality in Wages or Other Job Opportunities for Women Workers, etc.)	Several people present said that our area is very peaceful in response to this question. It can be said that there is no fighting, stealing, snatching or any kind of adulteration. They do not know whether there is any problem raised in the time of constructing land port, but no worker was appointed from the area. Later on, the people of the area expressed their dissatisfaction. Another respondent said that they do not think there will be any problem if the project which is going to be started now, gives the opportunity with priority to the workers of this area to work. This will benefit the people of this area financially. When asked about child labor, one of the respondents said that the children work in some stone breaking mills due to the family's financial strain, whether the child or the old man, they have to work. There is no problem if women workers are given jobs in low-risk jobs, as women have some problems in physically risky jobs. They believe that socio-economic development will be possible if proper action plans for women is formulated with the project and involve the local women.
7. Is there a possibility of any kind of conflict between local workers and workers from other areas? If so, what kind of conflicts are there? Whether any policy is followed in conflict resolution?	Workers from outside do not seem to have any problem in this area. The people of this area are very peaceful. Another respondent said that people from other areas are doing business in this area without any hindrance, they are not having any problem. When asked for suggestions on how to solve any problem arise, they said that if a committee is formed with the concurrence of the administration and the Labor Union leaders, it will be possible to immediately solve any problem in the project.
8. What kind of conditions / contracts do you think should be remain in the time of hiring workers? If so, what are the terms / contracts? Let us know about your views on whether the terms / contracts of the workers hired for the project are being implemented. (Interviewer: Recruitment duration, working hours, salary, leave, other benefits etc.)	In response to this question, almost all the respondents who were present there said that there should be a specific policy regarding recruitment of workers. There should be clear guidelines on how much a worker will be paid, how many hours he will work, what kind of compensation will be given in case of any accident. This will protect the interests of the workers as well as improve the quality of life of the workers who are working on this project. At present the average wage of the workers in this area is 300 to 350 taka. This is very low in the current market. These issues must be considered in hiring all the workers involved in the project. Then the workers will be mentally strong and the project will move forward to execution smoothly.
9. What kind of measures do you think are needed in the workplace to ensure the safety of the workers engaged in the project? (Interviewer: Helmet use, shoe use, machinery use, etc.)	In response to this question, all the respondents who were present said that safety must be given priority in the work of this project. Workers must be provided with adequate amounts of safety equipment such as helmets, gloves, goggles and other safety equipment. Another respondent

Summary of FGD Sessions with Truck labor association representative (v)	Responses
	said that the risk allowance and compensation should be kept in mind in case of an accident.
10. Please tell us in detail if there had been any clashes/ conflicts happened before with women workers / women workers groups who have come to work under any project or participated in any work.	Some of the respondents who are present there said they do not think any of the women workers who had come to work on the project has faced any trouble. However, no female labor or female worker will certainly face any kind of problem by the people of the area. Because eve-teasing, violence against women or women harassment are not common in their area.
11. To whom / where will the workers go to resolve any grievances / problems arising among the workers involved in the project? What is your opinion on an effective committee / action in resolving the grievances and how this committee will work, please give recommendation in regard of this. (Whether there should be a committee, who should this committee be with, what type of work will be there, etc.)	When asked about the grievance redressal committee, all the respondent who was present there agreed that the committee is needed. The proper working environment of the project will be maintained if this committee works for the safety of the labors and project workers and their various problems solutions
12. Do you think there is a need to pay special attention to the use of different resources (such as fuel, gas, water, sand, stone, raw materials for road construction, etc.) used in the project? Could the use of the mentioned things cause environmental pollution? If so, what are the measures that can be taken to prevent pollution?	Leaving construction materials scattered during the work of the project causes huge damage to the environment. Environmental pollution will be much less if these construction materials can be kept in a specific place making by a shed. They think that the project should have good waste management to avoid environmental pollution. Waste should be dumped somewhere far outside the project area so that the environment of the area is not polluted. The respondents said that many trucks will come from outside during the project, which will make it difficult to move on the road. To solve this problem, regular watering should be done at least twice in the morning and afternoon to reduce dust. This will reduce environmental pollution.
13. Describe the state of healthcare in your area. (What are the names of the health care providers in the area, whether they have adequate manpower, adequate medicine or medical equipment, what type of organization do you usually visit to get services, etc.)	When asked about health services, the respondents who were present there said that the quality of health services in this area is very poor. If someone is sick, he first buys medicine from the pharmacy. When the situation is out of control, they are taken to Rangpur Medical College. Asked why they were not taken to the Upazila Health Complex or Sadar Hospital, some of the respondents who were present said that the facilities at these hospitals were not adequate and even patients are referred to Rangpur Medical College when they saw their condition was a bit worse. So, if the patient seems a little bad condition, the patient taken directly to Rangpur Medical College.
14. Since the port area has a lot of cargo trucks / vehicles, do you have any problem with it? How is the safety of traveling? For example, whether there is any theft at night? If so, in what place it occurs the most? What is your advice to solve such problems?	In response to this question, the respondents who were present said that theft and robbery do not happen in this area but road accidents are always happening. The roads are very narrow and that's why freight trucks are getting into this accident. According to this, the number of vehicles move there is roads are not adequate, so the accident happened here. A respondent said that a truck overturned in front of the school a few days ago. Luckily, some students were present there but they were not harmed. The roads in the area is very dusty and become

Summary of FGD Sessions with Truck labor association representative (v)	Responses
	muddy on rainy days where some people jokingly plant paddy plants and spread them through social media. Another person said that the people of the area would be relieved of their misery if the road could be widened with the implementation of this project.
<p>15. What is the type of land in the project area (mouza area of the project) (one crop / two crop)? What crops are usually produced on the land? What kind of crop is produced in which season / month? What is the use of this land if it is not produced all year round? When is the land uncultivated? What is the use of uncultivated/vacant lands?</p>	<p>It is learned in the discussion that tobacco, maize and paddy are predominant in land cultivation in the area which is adjacent to the project. Farmers make more profit by cultivating tobacco in the land. The lands here are usually planted twice a year. However, there are some lands where multiple times crops are cultivated. Many landowners are renting land as a stone trading field instead of cultivating crops on the land. It makes a lucrative income every year by making annual contracts with traders. The amount of land which is lying fallow in the area is very low.</p>



Figure: FGD with Truck labor association representative

Summary of FGD with Burimari Community Female (VI)

Date	Location	Participants
11/12/21	Burimari zero-point, North side of the wall. Burimari, Patgram, Lalmonirhat	13 (Women)

Summary of FGD Sessions with Community Female (VI)	Responses
1. Development activities of Burimari Land Port are going to start in your area under Bangladesh Land Port Authority. What do you know about this project? If you know about the project, please tell us the in details. (Tell us in detail about the project's start time, the land acquisition, and how you know.)	The respondents of the focus group discussion said that they had not heard anything about the project from anyone.
2. What do you think that what are/will the advantages and disadvantages of the project in the area? Who do you think could be directly affected by the project and who could be indirectly affected? Whose interest do you think is involved in land port development? What are your comments / suggestions for problem solving in this case?	Asked about the advantages and disadvantages of the project, the women participants said that if the size of the port is increased as part of the project work, those people living on the north side of the port will suffer. They will lose their land. Another respondent said that the business and work of the people living here are all centered on this place. If the government acquires this community's land to increase the size of the port, they will be in trouble. Moreover, land is not readily available for purchase in this area, so they will be in danger if this land is acquired. Besides, no one has said anything about the advantages of the project.
3. What will be the impact on the women in your area due to the difficulties or problems that may or may not occur as a result of this project? Please provide us with a detailed idea of how safe the environment in your area is for the movement of women and children.	The respondents feel that the project will not have any special impact on women or children or cause them any inconvenience. However, one respondent said that there is already heavy traffic in the area, which makes it difficult for common people or school-going children to travel to school easily. If the project starts and the traffic is not resolved in a planned way, the movement of people will be completely disrupted.
4. Please tell us if there have been any incidents of violence or abuse against women in the area before. Please tell us in detail if there have been any conflicts or conflicts with women workers or women workers groups who have come to work under any project or participated in any work before in this area.	The respondents said there had never been any incident of violence or torture against women in the area. They said they did not know if the women of the area had worked as laborers in any project before. However, the men work as laborers in many different sectors of the area.

Summary of FGD Sessions with Community Female (VI)	Responses
<p>5. There is a large portion of workers who will come to your area from different districts and stay here in the interest of work in the project. What could be the problem due to workers coming from elsewhere in the project? What are your comments or suggestions for solving this problem? What percentage of local people in your area do you think could participate in the project as workers? Provide an idea of the state of child labor in the area. Do you think that women as workers can or will participate in various activities of the project? What is your advice in this regard? Please let us know, is there any kind of worker dissatisfaction, torture or any kind of unwanted incident are happened. (Gender based violence, sexual violence, child labor, forced labor, inequality in wages or other employment opportunities for female workers, etc.)</p>	<p>According to the respondents, it is better to employ locals as laborers in the project. They said that people from other areas are usually hired as laborers for any kind of work. But the people of the area are not given job opportunities more. Earlier, when land was acquired for the port, the families were informed that at least one member of each of the families whose land was being acquired would be involved in some form of work at the port. But later the families were not given any scope for works. According to the respondents, persons will be interested to do work as their capability of work.</p> <p>If there is any conflict or dissatisfaction among the workers involved in the project, only the people associated with the port can resolve it. No major clashes have ever taken place in the port area.</p>
<p>6. Do women in your area face any obstacles in getting education, engaging in income generating activities, etc.? What is the participation rate or opportunity of women in local government and other government organizations? What kind of income-generating work do widows or divorced women usually engage in to support their families? Do they have the opportunity to earn enough?</p>	<p>The respondents said that girls are far ahead of boys in getting education in their area. Educated women are being engaged with various jobs. And there are no barriers for women in this area to get education or engage in income generating activities. Rather, the family tries to give them enough support in getting education. There are women members in this area who are quite active in politics. Widows and divorced women in the area work as stonemasons, cooks in various hotels, and agricultural laborers on other people's agricultural lands to support their families. There is no social barrier for women to be involved in any kind of income generating activities.</p>
<p>7. Do men and women enjoy the resources they deserve in the distribution of wealth and land in your area? What is the ratio of female landowners to male landowners in this area?</p>	<p>Regarding the distribution of wealth or land ownership among women, the female respondents said that most of the women in the area are not given their due or right number of assets. In most cases the men of the family enjoy the wealth or asset, in very few cases the woman is given a share or equal amount of her due wealth. They said men in this area own about 90 percent of the land.</p>
<p>8. Is there any practice of child marriage in the area? If so, what is the percentage? What are the causes of child marriage? Is there a dowry system in marriage? Please give us a detailed idea about all these. What is the ratio of female landowners to male landowners in this area?</p>	<p>The respondents said that child marriage is almost non-existent in the area at present. But on the question of dowry, they said, there is no marriage in their area without dowry. Dowry is exchanged at the time of marriage in almost all the families and there is no such difference in the exchange of dowry between rich family or relatively poor family. Dowry is exchanged according to the ability of each family in this area.</p>
<p>9. What kind of problems do you think might arise if land is acquired in the interest of the project? Please explain the details of the compensation process when an acquisition is made. Does the acquisition create any inconvenient situation especially for women? If you have any previous acquisition</p>	<p>In the context of land acquisition in the interest of the project, the respondents actually objected to the acquisition of privately owned land. They said, "We have been evicted from our land once before. Our land was acquired in the present land port construction and a port was established there. We left that place</p>

Summary of FGD Sessions with Community Female (VI)	Responses
<p>experience in your area, discuss it with us. If the acquisition is done, discuss what you think would be better to compensate for the loss.</p>	<p>because of the acquisition and moved to where we are now. So where would we go if we were evicted again? This will be a big problem for us". They suggested that the port authorities could operate the port on the khas land on the east side of the port. In that case, they have no problem and they will cooperate with the port authorities. They also said that the government or the port authorities may think that the people will have no problem acquiring land if they get compensation. But even if they get compensation in reality, they will suffer because it is very difficult to find suitable land to buy after getting the compensation. At present, the amount of land which is sold in Burimari area is very low. Because landowners do not want to sell land. If they are evicted from their present place, they may have to leave this area and move to some other village far away or even to some other upazila. They think it will have a negative effect on their lives. The amount of compensation previously paid for their land acquisition was not adequate for them. In addition, they had to face various types of harassment in order to receive compensation. So, they are requesting to the port authorities to modernize the port on government fallow khas land without acquiring privately owned land.</p>
<p>10. Are there any tribes or ethnic groups in the project area? If so, what kind of problems might those tribes have because of the project? Tell us your opinions or suggestions to solve that problem.</p>	<p>All respondents said that no tribe and small ethnic groups live in this area.</p>
<p>11. To whom or where will you go to resolve any kind of complaint or problem arising out of the project? Do you know if there is any effective committee or arrangement in resolving the complaint? If so, tell us about the working style of that committee. (Whether there should be a committee, who should be included in the committee, what kind of work should be done, etc.)?</p>	<p>The respondents think that they have to face a problem in this situation. If such a situation arises, they will try to solve the problem by contacting the people in charge. Almost everyone present in this discussion thinks that it is necessary to have such a committee where the functioning of the committee will increase if there are representatives at all levels.</p>
<p>12. Do you think any special aspect should be taken into consideration while using different resources (such as fuel, gas, water, sand, stone, raw materials of road construction etc.) used in the project? Can the use of the mentioned issues cause environmental pollution? If so, what are the measures that can be taken to prevent pollution?</p>	<p>In this question, they said that the raw materials, fuel and other utensils used in the project should be kept in a specific place. One of the respondents said that it is common to see in these works that rods, sand, etc. construction materials are left on the road during the work, which creates widespread problems in movement. They said that if the daily wastage is removed every day, there will be no harm to the environment.</p>
<p>13. Will the project have any impact on roads, environment and canals or rivers? If so, what kind? What are your comments or suggestions for problem solving?</p>	<p>The respondents think that a lot of freight cars or trucks will come during the project which will make the roads in this area more destroyed. The roads in this area are very narrow, leading to frequent road accidents. They think that if the road is not widened before the project starts, the number of road accidents and traffic congestion will increase. The idea of the respondents is that if the project does not have proper waste management, the environment of the area will be severely damaged. So, before starting work on the</p>

Summary of FGD Sessions with Community Female (VI)	Responses
	project, they think that work should be started keeping in mind the issue of proper waste management.
14. Do you think that any school or college or madrasa or cultural heritage or historical place in your area will be affected by the impact of this project? If this happens, what is your advice to avoid or compensate for the loss?	The respondents said that there is no school or college or madrasa or cultural organization in this area.
15. Do you think that the local area's religious institutions, historical and traditional structures will be hampered or damaged by the project? What are your comments or suggestions for problem solving?	The respondents said no religious institutions or historical sites would be damaged in the project area.
16. Please describe in detail about the state of healthcare in your area. (What are the names of the health care providers in the area, whether they have adequate manpower, adequate medicine or medical equipment, what level of organization do you usually visit, etc.)	When asked about health services, everyone present in the discussion gave a picture of the health system in the area. If a patient's condition is critical or if he is a dying patient, the people of the area take him directly to Rangpur Medical without taking him to Upazila Health Complex or Lalmonirhat Sadar Hospital. Asked about the reasons for not going to Patgram Upazila Health Complex or Lalmonirhat Sadar Hospital, they said that people do not get adequate health care in these hospitals due to poor quality of health services, inadequate manpower and lack of medical equipment. Even the local doctors who serve locally, their skills are comparatively less, so they take any dying patient directly to Rangpur or Dhaka without taking him in the local area hospitals.
17. Give an idea about the existing educational institutions in your area. (Number of primary, secondary, higher secondary education institutions / your satisfaction with the quality of education offered in educational institutions or infrastructural condition of educational institutions, scholarship system etc.)	The respondents said there are enough primary education institutions in the area. There are 10/15 primary schools in the area, but only one secondary school. On the other hand, there is only one college which is situated about 7/8 km away from here. They said that the number of schools going girls is higher than the number of boys in the area because boys have to take care of their families at an early age, which is why the dropout rate is much higher among the boys.
18. Please tell us which way may be most effective for conveying any information about the project. (Miking, leaflets, magazines, etc.)	The respondents said that miking can be the most effective way to convey any information about a project because most people are day laborers. So, they think miking can be an important and effective way to inform about the project.
19. How is the communication system in your area? Is there a road that breaks or disrupts travel? Is there enough road? If not, where the new road should be constructed for you which will be helpful for you? What type of vehicle is used as a means of communication in your area?	In response to this question, every respondent present there said that roads in the area are bad. No work has been done in the last 10/15 years to repair the road on the south side of the land port. In addition, the road from Burimari Bazar to Burimari Zero Point is less wide than the amount of traffic on the main highway which leads to incidents like road accidents. Traffic jams are a daily occurrence in this area. Small or big road accidents are often heard by them. Being a port area, a lot of trucks or heavy vehicles enter the Burimari area, so they have to wait or sit in traffic jams for a long time. They think that if an alternative road can be built, it will be a blessing for the movement of the common people. They use engine driven vans or autorickshaws to get anywhere in the less distance. They use train or

Summary of FGD Sessions with Community Female (VI)	Responses
	bus to get to some remote places like Patgram or Lalmonirhat. However, auto is easily available to go to the upazila level.
20. Since a lot of cargo trucks are run in the port area, do you have any problem with it? How is the safety of travel? For example, whether there is any theft at night? If the theft is more in any place? What is your advice to solve such kind of problems?	In response to this question, the respondents said that it is very difficult for them to move on the roads due to the movement of a lot of trucks. They have to wait for a long on the road. They mentioned about the problems of road accidents, lots of dust etc. However, it can be said that the incident of theft and snatching did not happen at all.
21. What is the type of land in the project area (mouza area of the project) (one crop or two crop)? What crops are usually produced on the land? What kind of crop is produced in which season or month? What is the use of this land if it is not produced all year round? When the land is vacant? Are fallow or vacant lands used for work?	The female respondents said that cultivation of crops is decreasing in this area. Only tobacco and corn are more cultivated in the lands which are still cultivated.
22. What kind of trees do you usually have in your area? How is the price of the tree determined or at what price trees are bought and sold?	The respondents said that the number of mango and betelnut trees are more in this area. Eucalyptus and mahogany trees are the most common among the woody trees. Apart from this, coconut, jackfruit, mango, neem etc. trees are also seen more or less in this area.
23. What is the type of ownership of the roadside trees? How these trees are sold? Who gets the money of selling trees?	The respondents said they had no idea about how the roadside trees are sold.
24. If there is a pond or lake in this area, what is the usage of that? Is fish farmed in the ponds all year round where fish is farmed usually, what kind of fishes are farmed? What is the price of fish?	The respondents said that fishes are farmed or cultivated so much in this area. The number of ponds is not also high. Telapia, Ruhi, Catal fishes are farmed more in the ponds where fishes are farmed.
25. What is the percentage of mobile usage of men and women in this area?	None of the respondents could say anything about the percentage of mobile usage of women and men. However, they mentioned that males and 40% by females use approximately 60%.
26. What percentage of houses in this area have electricity connection? Describe the current state of load shedding.	The respondents said that all of the houses in this area have electricity connection. However, they mentioned that there is a lot of load shedding. There is at least seven to eight times of load shedding in every day. They have informed the electricity office several times, but the situation has not changed.
27. What percentage of people in this area use internet? Who uses the Internet more and what kind of work do they use the internet?	Asked about the internet usage, they said that almost everyone who has a smartphone uses facebook-youtube etc. more. They also said that internet is used for various purposes including admission in various government schools and colleges.
28. Please tell us the name the NGOs that conduct activities in your area. Tell us what programs these NGOs run. Discuss in detail how much people in the area are involved with the NGO and for what reason. What kind of organization is working or has done in the past to raise awareness about environmental pollution?	According to the respondents, all the NGOs in the area are involved in micro-credit at high interest rates. Grameen Bank, RDRS, Proshika, BRAC, TMSS have more activities in this sector. However, no one has run a social or environmental awareness campaign in this area.



Figure: FGD with community Female

Summary of FGD Carried Out by NBR**Details of the In-person Stakeholder Consultation Meeting**

Issues	Description
Stakeholder Consultation Meeting Date	20 December, 2021
Stakeholder Consultation Meeting Time	11.00 am - 1.00 pm
Stakeholder Consultation Meeting Venue	Conference Room, Custom House, Chattogram
Issues	Discussion
Environmental Risks and Management	<p>Due to the nature and size of the project, the participants were more interested to discuss on the infrastructural design and environmental aspects of the project. Followings are some key environmental factors that were identified and asked to take into consideration during implementation of the project:</p> <ul style="list-style-type: none"> • Air and Noise pollution would be one of the vital issues, particularly during the period when the existing building would be demolished to build new ones. There should be a proper plan in place to minimize air and noise pollution during the implementation period. • Custom House, Chattogram discard huge amount of paper every day. They usually store those papers in a warehouse and then sell those off later. During the site visit, the World Bank team observed a huge amount of waste paper stored in the corners of the balconies those are waiting to get disposed in the proper way. However, a paper recycling center or/and waste treatment plant can be considered to build so that they can dispose them immediately to maintain a clean working environment. • Sound pollution management system in the new buildings; this needs to take into consideration by installing sound proof windows and other ventilation systems. • The Custom House, Chattogram has a decent number of trees inside their compound. During the implementation of the project, need to minimize the number of trees will be cut down. • Custom House, Chattogram chemical laboratory is one of the crucial laboratories in the country, where 90% of the chemicals are tested that are imported in Bangladesh. The lab is severely understaffed (it has only 4 people and among them 3 are assistants) and the lab technically operates only in two rooms. The ESMF should propose a “Hazardous Material Management Plan” before implementation of the project. The HCMP should clearly mention probations on how to transfer the chemicals from one place to another. • Water logging during the rainy season: Custom Excise and VAT Training Academy goes under water during the rainy season. This temporary yet hazardous problem makes lives miserable for the people who live and work in that area. • Custom Excise and VAT Training Academy (CEVTA) produces significant amount of waste every day and the representative of the CEVTA suggested a waste treatment plant in their compound to keep the environment clean and safe on a regular basis. • Drainage system: Proper drainage system is important to keep the area clean and safe for all. While designing and panning for this system, need to consider sustainability issues, like capacity and proper management in mind. • Rooftop Management: Green rooftop management can be considered to increase the aesthetic aspect of the building. Also, plantation, proper sitting area for small meetings, well managed open area for different activities can be considered within the design which can potentially benefit everyone.
	<ul style="list-style-type: none"> • Sometimes there are accidents and even fatalities during construction. Proper measures have to be taken to avoid these kinds of incidents.

Issues	Discussion
Social Risks and Management	<ul style="list-style-type: none"> • Temporary resettlement of the NBR employees/workers living in the compound of both sites; proper compensation and related issues has to be considered with utmost care. There are no squatters/informal occupants at both sites. • People visiting Custom House, Chattogram mostly have their lunch in the compound in an existing canteen. During the reconstruction of the compound, the canteen will not be there and that may create some inconveniences for the people visiting Custom House. An alternative of this system needs to be considered during the implementation. • Mosquitoes and pesticides control measures; mostly forgotten but one of the crucial issues since serious health issues like dengue, chikungunya, etc. are associated with this. • Traffic congestion: During the construction period, the amount of usable land will be reduced, hence creating traffic congestion inside the compound. An alternative plan needs to put in place to minimize the congestion.
Infrastructural Design Related Feedback for Custom House, Chattogram	<p>Everyday around 2000 people come visit Custom House, Chattogram and the number of incoming people will go up in next decades, given the growth trajectory of Bangladesh. Hence, the design of the building has to be foresightful and it is important that the building is designed in a way that would be sustainable with green engineering design, remain relevant to time, and most importantly, can accommodate any changes in demand of time.</p> <ul style="list-style-type: none"> • The new buildings need to be built in a way that they have enough probation to use daylight during the day time as a source of light. Enough open space and green building need to take into consideration to minimize the use of Air Conditioner. • The buildings need to have wide stair case to manage fire hazard; and the lift and stair can't be side by side. • The building must have an emergency exit and the staircase of the exit has to be wide enough to accommodate enough people at a time during fire or any other disaster. • The building must have a separate prayer room and washroom for ladies. Also, a separate rest room for child care or can be used as a rest room. • The building must have two to three seminar halls of different capacity and an auditorium. Also, the present stakeholders suggested considering a gym/yoga center, a library and dining halls as of needs. • The building must have three to four lifts and each lift should have a capacity to lift 20 people or more. • Proper parking space is of high importance and it has to be properly managed to accommodate all incoming vehicles. • The compound must have proper toilet facilities outside for the visitors.
Planning and Operational Management	<ul style="list-style-type: none"> • During the project implementation, there will be temporary arrangement for many issues, like resettlements, labor sheds, server reinstallation, and many more. It needs to make sure that the temporary operational issues are smooth and not interrupting the daily activities of Custom House, Chattogram. • Custom House, Chattogram server installation is supremely important; sincere attention is needed here. • The existing Custom House building will not be broken initially; the rest of the complex will be rebuilt first and then the official activities will be moved to those new buildings temporarily. • There is a grave, that has to be preserved. • NBR needs to apply to the forest department for clearance for cutting down the trees of the compound.

Issues	Discussion
Suggestions (Not related to ES)	<ul style="list-style-type: none"> Alternative connecting road from Bangladesh to Agartala: People living in Agartala need 36 hours to reach Kolkata, whereas they can reach to the nearest Bangladesh districts within 3-4 hours. There is a huge untapped trade potential for both counties in that area. An alternative smooth road connectivity can ease the process and can facilitate trading in that area. Custom House and port connectivity: To mitigate traffic congestion, an underpass connecting the Custom House and Port would be helpful.



Stakeholder Consultation Meeting, Custom House, Chattogram

Annex C: List of Attendees



Bangladesh Bhutan India Nepal Multiphase Programmatic Approach Program (BBIN MPA Program)
for "The Development of Benapole, Bhamra And Burimari Land Ports in Bangladesh."

List of Participants in Public Consultation

Address: Land Port, Burimari, Patgram, Lalmonirhat

GPS: _____

Date: 13.12.2021 Time 3.00 Pm, Monday.

Sl No.	Participant's Name	Age	Occupation	Telephone No.	Signature
1	মোহাম্মদ রুহুল আমিন Mohammad Ruhul Amin	44	Job	Mobile: 01718-228834	
2	শ্রী: মোঃ মুহাম্মদ জেদ মোহাম্মদ জেদ: বিজিডি	৫৮	বিজিডি	01728422225	
৩	মোহা: বাহালা মুহাম্মদ মুহাম্মদ	৪০	প্রকৃত শিক্ষক	01712-581142	
৪	শ্রী: মজিবুল হক মজিবুল হক	৪৫	বিজিডি F.S.	01735-927404	
৫	শ্রী: মোহাম্মদ হোসেন মোহাম্মদ হোসেন	৪০	বিজিডি F.S.	0172527225	
৬	শ্রী: আমানুল হক আমানুল হক	৪৬	ড্রামার	01984815885	
7	শ্রী: মাসুদ আলী মাসুদ আলী	35	ড্রামার	01754683673	
8	শ্রী: মাসুদ আলী মাসুদ আলী	27	ড্রামার	01738385555	
9	শ্রী: মাসুদ আলী মাসুদ আলী	60	ড্রামার	01738385555	
10	শ্রী: মাসুদ আলী মাসুদ আলী	40	ড্রামার	0170592425	
11	শ্রী: মাসুদ আলী মাসুদ আলী	60	ড্রামার	01731964465	
12	শ্রী: মাসুদ আলী মাসুদ আলী	28	ড্রামার	0140351002	
13	শ্রী: মাসুদ আলী মাসুদ আলী	32	ড্রামার	" "	
14	শ্রী: মাসুদ আলী মাসুদ আলী		ড্রামার	0192001772	

Facilitated By: Sabbir Ahmed

Note Taken By: Md Abdur Razzaque Azad
Md. Redwan Hossain Chuyra



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Bangladesh Bhutan India Nepal Multiphase Programmatic Approach Program (BBIN MPA Program)
for "The Development of Benapole, Bhomsra And Burimari Land Ports In Bangladesh."

List of Participants in Public Consultation

Address:

GPS:

Date: Time

Sl. No.	Participant's Name	Age	Occupation	Telephone No.	Signature
015	Md. Anwarul Hossain	37	Service BD Police	01714537036	<i>Anwar</i> 13.12.21
026	Md. Rabiul Islam	40	Imam	0130-7502005	<i>Rabiul Islam</i> 13.12.21
017	Md. Eddris ALI	33	Imam	01917-299957	<i>Eddris</i> 13.12.21
018	Md. Salim Khan	32	BD Police	01731241515	<i>Salim</i> 13/12/21
019	Mostafa Kamal	28	Business	01715798014	MOSTAFA Kamal
020	Shahel Islam	28	Business	0174063014	Shahel Islam
021	Md. Rabiul Islam	36	Business	01744174433	Rabiul Islam
022	Md. Ripon	26	Business	01750176681	Ripon
023	Md. Shahid Ali	50	Teacher	01948034112	Shahid Ali
024	Akhtaruzzaman	38	Teacher	01724564562	Akhtaruzzaman
025	Md. Hasmatullah	44	Service	01716-336742	Hasmatullah
026	Md. Minhaz Uddin	44	Service	01911434172	Minhaz Uddin
027	Md. Adnan Khalid Bosuik	33	Service	01767389017	Adnan
028	Md. Selim Reza	32	Service	01722262086	Selim

Facilitated By Sabbite Ahmed

Note Taken By Md. Abdur Razzaque Akad
Md. Redwan Hossain Chhujon

Arranged By-





Bangladesh Bhutan India Nepal Multiphase Programmatic Approach Program (BBIN MPA Program) for "The Development of Benapole, Bhomra And Burimari Land Ports in Bangladesh."



List of Participants in Public Consultation

Address:

GPS:

Date: Time

Sl. No.	Participant's Name	Age	Occupation	Telephone No.	Signature
29	Bhuvan Kumar Sarker	33	Service	01736502952	Bhuvan
30	শ্রী. শ্রীমান সান্না	65	ওয়াল	01721876977 01721761777	শ্রীমান
31	শ্রী. শ্রীমান সান্না	56	ওয়াল	01707497601	শ্রী. শ্রীমান সান্না
32	শ্রী. সান্না	29	ওয়াল	01716864133	শ্রী. সান্না
33	সান্না	24	চাকরি	01980828629	সান্না
34	শ্রী. রেজাউল করিম	60	চাকরি	01796040934	শ্রী. রেজাউল করিম
35	শ্রী. সান্না	25	সিস্টেমিক	01773083768	শ্রী. সান্না
36	শ্রী. সান্না	84	সিস্টেমিক	01919822181	শ্রী. সান্না
37	শ্রী. সান্না	26	সিস্টেমিক	01675795811	শ্রী. সান্না
38	শ্রী. সান্না	30	সিস্টেমিক	01712-025966	শ্রী. সান্না
39	Saiful Islam Imran	28	Jr. Environment consultant DRI	01716242032	Imran
40	Sabbir Ahmed Dhal	34	Field coordinator social development DRI	01709577945	শ্রী. সান্না

Facilitated By Sabbir Ahmed

Note Taken By Md. Abdur Razzaque Akad.
Md. Redwan Hossain Bhuiyan.



Bangladesh Bhutan India Nepal Multiphase Programmatic Approach Program (BBIN MPA Program)
for "The Development of Benapole, Bhomra And Burimari Land Ports in Bangladesh."

List of Participants in FGD

Address: বুড়িশাড়া - সুলতান ফাটল ম.প.ত (Male)
 GPS: _____
 Date: 10.12.2021 Time: Time: 3:30 Pm

Sl No.	Participant's Name	Age	Occupation	Telephone No.	Signature
1.	শ্রীমতী অরুণা আক্তার	58	অকৃষি শ্রমিক	01746445855	
2.	শ্রীমতী আশরাফুল হোসেন	78	অকৃষি শ্রমিক	01746445855	
3.	শ্রীমতী মাহবুবাহ আলম	38	শ্রমিক	01715772015	(Signature)
4.	শ্রীমতী মাহবুবাহ আলম	38	শ্রমিক	01770630149	(Signature)
5.	শ্রীমতী মাহবুবাহ আলম	29	শ্রমিক	01722104634	
6.	শ্রীমতী মাহবুবাহ আলম	45	শ্রমিক	01984815885	(Signature)
7.	শ্রীমতী মাহবুবাহ আলম	48	শ্রমিক	01716864133	(Signature)
8.	শ্রীমতী মাহবুবাহ আলম	40	শ্রমিক	01705924215	
9.	শ্রীমতী মাহবুবাহ আলম	32	শ্রমিক	01774641432	
10.	শ্রীমতী মাহবুবাহ আলম	32	শ্রমিক	01774462375	
11.	শ্রীমতী মাহবুবাহ আলম	37	শ্রমিক	01994828763	

Facilitated By Sabbir Ahmed Dhal

Note Taken By Abdullah Rasheed Akbar



Bangladesh Bhutan India Nepal Multiphase Programmatic Approach Program (BBIN MPA Program)
for "The Development of Benapole, Bhamra And Burimari Land Ports in Bangladesh."



List of Participants in FGD

Address: Conference Hall, Burimari Land Port office - with Importers and
 GPS: C&F Agents
 Date: 11.12.2021 Time: _____

Sl No.	Participant's Name	Age	Occupation	Telephone No.	Signature
1.	Md. Mojaharul Islam	36	Importer	0174939233	
2.	Md. Saadul Rahman Path	42	Importer	01718916551	
3.	Fazidul Islam	35	Importer		
4.	Habibur Rahman Habib	40	C&F	01725163115	
5.	Md. Abduer Rasid	35	C&F	01710488920	
6.	MD. AFZAL HOSSON	40	C&F	01768906042	
7.	MD. ABU ALAM	48	C&F	01718-022831	
8.	MD. FABIUL ISLAM	128	Importer	01748-494918	
9.	Habibur Rahman Habib	40	C&F	01725163115	
10.	Sahag Chowdhury	27	C&F	01780x16977	

Facilitated By Sabbir Ahmed Dhali

Note Taken By Md. Rakibul Islam

Arranged By-





Bangladesh Bhutan India Nepal Multiphase Programmatic Approach Program (BBIN MPA Program)
for "The Development of Benapole, Bhonra And Burimari Land Ports in Bangladesh."



List of Participants in FGD

Address: Tatipara, Mr. Robunurrahman House, Burimari, Lalmoni
GPS: with Community Elite Persons
Date: 11.12.21 Time 11.00 AM to 1.00 PM

Sl. No.	Participant's Name	Age	Occupation	Telephone No.	Signature
1	MD. ROBUNURRAHMAN ROBUN	56	Business	01714692830	
2	HAFEZ NOOR MOHAMMAD	38	Teaching	01732154877	
3	MD. RAMZAN ALI	26	TEACHER	01734843947	
4	MD. ANAMUL HAQUE	50	FARMER		
5	MD. SAIDUR RAHMAN	48	BUSINESS	01715636701	
6	MD. ALTAH HOSSAIN	56	BUSINESS AL-President	01716185089	
7	MD. SHAHZAHAN MIAH	60	LABOUR	01731908308	
8	MD. SAYED AHMED	28	INAM O'Point NPSA	01737503714	
9	MD. ABDUS SALAM	43	BUSINESS	01716130447	
10	MD. SAZAD	43	BUSINESS	01714966858	

Facilitated By MD. Abdeet Raeesque Akmal

Note Taken By MD. Redwan Hossain Bhuiyan

Arranged By-





Bangladesh Bhutan India Nepal Multiphase Programmatic Approach Program (BBIN MPA Program)
for "The Development of Benapole, Bhomra And Burimari Land Ports in Bangladesh."



List of Participants in FGD

Address: Burimari Bazar
GPS: With members of Truck labor association
Date: 11.12.21 Time: 8.30 PM to 9.20 PM

Sl. No.	Participant's Name	Age	Occupation	Telephone No.	Signature
1	MD. SHAHANUZZAMAN	36	Member, Truck-Labour	01766397174	
2	MD. ALTAH HOSSAIN	55	President, Truck Labour Union	01716185989	
3	QADSHA ALAM GIR	35	Organising secretary	01723581099	
4	SHAMIM OSMAN	23	VP, Union BSL	01737684731	
5	MD. REZAUL KARIM	33	Secretary, Truck Labour Union	01796040934	
6	MD. RABIUL ISLAM	27	Student, Member, Truck Union	01743778873	
7	MD. ABU BAKKAR	22	CNF Staff	01774475305	

Facilitated By Sabbir Ahmed Dhal

Note Taken By Md. Redwan Hossain Bhuiyan

Arranged By-





Bangladesh Bhutan India Nepal Multiphase Programmatic Approach Program (BBIN MPA Program)
for "The Development of Benapole, Bhomra And Burimari Land Ports in Bangladesh."

List of Participants in FGD

Address: BURIMARI ZERO POINT, DATGRAM, LALMONIRHAT
 GPS: (Female)
 Date: 11.12.2021 Time 3:00 PM

Sl. No.	Participant's Name	Age	Occupation	Telephone No.	Signature
1	মোছঃ কাপাল বেগম	22	শ্রমিকী	01740 351002	মোছঃ কাপাল
2	মোছঃ সুলতান	22	শ্রমিকী	01774641432	
3	মোছঃ সিদ্দীকা বেগম	20	"	0176039785	সিদ্দীকা
4	সুলতান বেগম	48	"	01746445855	
5	সুলতান বেগম	54	"	01740 351002	
6	সুলতান বেগম	25	"	01405831129	সুলতান
7	মোছঃ সুলতান	18	শ্রমিকী	01746445855	
8	সুলতান বেগম	32	শ্রমিকী	01740351002	
9	মোছঃ সুলতান বেগম	36	শ্রমিকী	01723561664	সুলতান
10	সুলতান বেগম	48	শ্রমিকী	01405831129	
11	মোছঃ সুলতান	22	শ্রমিকী	01710 246498	সুলতান

Facilitated By Sabbir Ahmed

Note Taken By Md. Abdur Razzaque Akbar

12 সুলতান বেগম 36 - শ্রমিকী - 01754049581 সুলতান
 13 মোছঃ সুলতান বেগম 25 - " - 01723454350 সুলতান



List of Participants (NBR Part)

Sl No.	Name of the Participants	Designation
1.	Dr. Abu Nur Rashed Ahmed	Additional Commissioner of Custom House, Chattogram
2.	Mohammed Shafi Uddin	Additional Commissioner of Custom House, Chattogram
3.	Mohammad Tafsir Uddin Bhuyan	Joint Commissioner, Custom House, Chattogram
4.	Md. Tofayel Ahmed	Joint Commissioner, Custom House, Chattogram
5.	Salahuddin Rizvi	Deputy Commissioner, Custom House, Chattogram
6.	Khadiza Parvin Shumy	Deputy Director, CEVTA
7.	Salina Akhtar	Member, Chattogram Women Chamber of Commerce
8.	Rebeka Nasreen	Director, Chattogram Women Chamber of Commerce
9.	Tori Chakma	Owner, Mizel Hozal
10.	M.M Rafiqul Islam	Vice President, C&F Agent Association
11.	Ashrafal Haque Khan Swapon	Joint Customs Secretary, C&F Agent Association
12.	Abul Khair	Joint Customs Secretary, C&F Agent Association
13.	Md. Golam Shamsun Bhuiyan	Salim Brothers (Pvt) Ltd, C&F Agent
14.	Dedarul Hasan	Araf Enterprise, C&F Agent
15.	Mominul Hasan Mithun	Assistant Revenue Officer, Custom House, Chattogram
16.	Palindra Chakma	Assistant Revenue Officer, Custom House, Chattogram
17.	Partha Kumar Biswas	Assistant Revenue Officer, Custom House, Chattogram
18.	Sarowar Alam	Assistant Revenue Officer, Custom House, Chattogram
19.	Mohammad Ashraf Karim Chowdhury	Assistant Terminal Manager, Traffic Department, Chattogram Port Authority
20.	Kirti Nishan Chakma	Social Development Specialist, The World Bank
21.	Dr. Md. Billal Hossain	Environment Consultant, The World Bank
22.	Ferdousi Mahojabin Sumana	Social Development Consultant, The World Bank

Annex D: Details of the Environmental and Social Code of Practices (ESCoPs)**ESCoP 1: Waste Management**

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
General 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 a waste management plan for various specific waste streams (e.g., reusable waste, flammable waste, construction debris, food waste, etc.) prior to construction and submit to DSM 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 the disposal site to cause less environmental impact. • Minimize waste materials production by 3R (Reduce, Recycle and Reuse) approach. • Segregate and reuse or recycle all the wastes, wherever practical. • Prohibit burning of solid waste • Collect and transport non-hazardous wastes to all the approved disposal sites. Vehicles transporting solid waste shall be covered with tarps or nets to prevent spilling waste along the route • Train and instruct all personnel in waste management practices and procedures as a component of the environmental induction process. • Provide refuse containers at each worksite. • Request suppliers to minimize packaging where practicable. • Place a high emphasis on good housekeeping practices. • Maintain all construction sites in a cleaner, tidy and safe condition and provide and maintain appropriate facilities to temporarily store all wastes before transportation and final disposal.
Hazardous Waste	Health hazards and environmental impacts due to improper waste management practices	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Collect chemical wastes in 200-liter drums (or similar sealed container), appropriately labeled for safe transport to an approved chemical waste depot. • Store, transport and handle all chemicals avoiding potential environmental pollution. • Store all hazardous wastes appropriately in bunded areas away from water courses. • Make available Material Safety Data Sheets (MSDS) for hazardous materials on-site during construction. • Collect hydrocarbon wastes, including lube oils, for safe transport off-site for reuse, recycling, treatment or disposal at approved locations. • Construct concrete or other impermeable flooring to prevent seepage in case of spills.

ESCoP 2: Fuels and Hazardous Substances Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Fuels and hazardous goods	Materials used in construction have a potential to be a source of contamination. Improper storage and handling of fuels, lubricants, chemicals and hazardous goods/materials on-site, and potential spills from these goods may harm the environment or health of construction workers.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Prepare spill control procedures and submit the plan for DSM approval. • Train the relevant construction personnel in handling of fuels and spill control procedures. • Store dangerous goods in bunded areas on a top of a sealed plastic sheet away from watercourses. • Refueling shall occur only within bunded areas. • Make available MSDS for chemicals and dangerous goods on-site. • Transport waste of dangerous goods, which cannot be recycled, to a designated disposal site approved by DoE. • Provide absorbent and containment material (e.g., absorbent matting) where hazardous material are used and stored and personnel trained in the correct use. • Provide protective clothing, safety boots, helmets, masks, gloves, goggles, to the construction personnel, appropriate to materials in use. • Ensure all containers, drums, and tanks used for storage are in good condition and are labeled with expiry date. Any container, drum, or tank that is dented, cracked, or rusted might eventually leak. Check for leakage regularly to identify potential problems before they occur. • Store hazardous materials above flood plain level. • Put containers and drums in temporary storages in clearly marked areas, where they will not be run over by vehicles or heavy machinery. The area shall preferably slope or drain to a safe collection area in the event of a spill. • Put containers and drums in permanent storage areas on an impermeable floor that slopes to a safe collection area in the event of a spill or leak. • When handling and storing fuels and lubricants, take all precautionary measures, avoiding environmental pollution. • Avoid the use of material with greater potential for contamination by substituting them with more environmentally friendly materials. • Return the gas cylinders to the supplier. However, suppose they are not empty prior to their return. In that case, they must be labeled with the name of the material they contained or contain, information on the supplier, cylinder serial number, pressure, their last hydrostatic test date, and any additional identification marking that may be considered necessary.

ESCoP 3: Water Resources Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Hazardous Material and Waste	Water pollution from storage, handling and disposal of hazardous materials, general construction waste, and accidental spillage.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Follow the management guidelines proposed in ECOPs 1 and 2. • Minimize the generation of sediment, oil and grease, excess nutrients, organic matter, litter, debris and any form of waste (particularly petroleum and chemical wastes). These substances must not enter waterways, storm water systems or underground water tables.
Discharge from Construction sites	<p>During construction, both surface and groundwater quality may deteriorate due to river construction activities, sewerages from construction sites, and work camps. The construction works will modify groundcover and topography, changing the area's surface water drainage patterns, including infiltration and storage of storm water. These changes in hydrological regime lead to increased rate of runoff, increase in sediment and contaminant loading, increased flooding, groundwater contamination, and effect habitat of fish and other aquatic biology.</p>	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Install temporary drainage works (channels and bunds) in areas required for sediment and erosion control and around storage areas for construction materials • Install temporary sediment basins, where appropriate, to capture sediment-laden run-off from site • Divert runoff from undisturbed areas around the construction site • Stockpile materials away from drainage lines • Prevent all solid and liquid wastes entering waterways by collecting solid waste, oils, chemicals, bitumen spray waste and wastewaters from brick, concrete and asphalt cutting where possible and transport to an approved waste disposal site or recycling depot • Wash out ready-mix concrete agitators and concrete handling equipment at washing facilities off site or into approved banded areas on site. Ensure that the tires of construction vehicles are cleaned in the washing bay (constructed at the construction site entrance) to remove the mud from the wheels. This shall be done in every exit of each construction vehicle to ensure the local roads are kept clean.
Soil Erosion and siltation	Soil erosion and dust from the material stockpiles will increase surface water bodies' sediment and contaminant loading.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Stabilize the cleared areas not used for construction activities with vegetation or appropriate surface water treatments as soon as practicable following earthwork to minimize erosion • Ensure that roads used by construction vehicles are swept regularly to remove sediment • Water the material stockpiles, access roads and bare soils on an as required basis to minimize dust. Increase the watering frequency during periods of high risk (e.g. high winds)
Construction activities in water bodies	Construction works in the water bodies will increase sediment and contaminant loading, and effect habitat of fish and other aquatic biology.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Dewater sites by pumping water to a sediment basin prior to release off site – do not pump directly off site • Monitor the water quality in the runoff from the site or areas affected by dredge plumes, and improve work practices as necessary

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> • Protect water bodies from sediment loads by silt screen or bubble curtains or other barriers • Minimize the generation of sediment, oil and grease, excess nutrients, organic matter, litter, debris and any form of waste (particularly petroleum and chemical wastes). These substances must not enter waterways, storm water systems or underground water tables. • Use environment friendly and nontoxic slurry during construction of piles to discharge into the river. • Reduce infiltration of contaminated drainage through storm water management design • Do not discharge cement and water curing used for cement concrete directly into water courses and drainage inlets.
Drinking water	Groundwater at shallow depths is contaminated with arsenic and hence not suitable for drinking purposes.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Pumping of groundwater shall be from deep aquifers of more than 300 m to supply arsenic free water. Safe and sustainable discharges are to be ascertained prior to selection of pumps. • Tube wells will be installed with due regard for the surface environment, protection of groundwater from surface contaminants, and protection of aquifer cross contamination • All tube wells, test holes, monitoring wells that are no longer in use or needed shall be properly decommissioned.
	Depletion and pollution of groundwater resources	<ul style="list-style-type: none"> • Install monitoring wells both upstream and downstream areas near construction yards and construction camps to monitor the water quality and water levels regularly. • Protect groundwater supplies of adjacent lands

ESCoP 4: 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 due to the construction activities harms the 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 preventing/avoiding standing waters, which DSM 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

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<p>conforms to the relevant standards provided by DoE, before it being discharged into the recipient water bodies.</p> <ul style="list-style-type: none"> • 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. • Construct wide drains instead of deep drains to avoid sand deposition in the drains that require frequent cleaning. • Provide appropriate silt collector and silt screen at the inlet and manholes and periodically clean the drainage system to avoid drainage congestion. • Protect natural slopes of drainage channels to ensure adequate storm water drains. • Regularly inspect and maintain all drainage channels to assess and alleviate any drainage congestion problem. • Reduce infiltration of contaminated drainage through storm water management design.
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 capable of storing water, after use or store them in inverted position.

ESCoP 5: Soil Quality Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Filling of Sites with dredge spoils	Soil contamination will occur from drainage of dredged spoils	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Ensure that dredged sand used for land filling shall be free of pollutants. Prior to filling, sand quality shall be tested to confirm whether soil is pollution free. Sediments shall be properly compacted. Top layer shall be the 0.5 m thick clay on the surface and boundary slopes along with grass. Suitable soils shall construct side Slope of Filled Land of 1:2 with proper compaction as per design. Slope surface shall be covered by top soils/ cladding materials (0.5m thick) and grass turfing with suitable grass. • Leaching from the sediments shall be contained to seep into the subsoil or shall be discharged into settling lagoons before final disposal. • No sediment laden water in the adjacent lands near the construction sites, and/or wastewater of suspended materials excessive of 200mg/l from dredge spoil storage/use area in the adjacent agricultural lands.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Storage of hazardous and toxic chemicals	Spillage of hazardous and toxic chemicals will contaminate the soils	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Strictly manage the wastes management plans proposed in ECP1 and storage of materials in ECP2 • Construct appropriate spill contaminant facilities for all fuel storage areas • Establish and maintain a hazardous materials register detailing the location and quantities of hazardous substances including the storage, use of disposals • Train personnel and implement safe work practices for minimizing the risk of spillage • Identify the cause of contamination, if it is reported, and contain the area of contamination. The impact may be contained by isolating the source or implementing controls around the affected site • Remediate the contaminated land using the most appropriate available method to achieve required commercial/industrial guideline validation results.
Construction material stock piles	Erosion from construction material stockpiles may contaminate the soils	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Protect the toe of all stockpiles, where erosion is likely to occur, with silt fences, straw bales or bunds.

ESCoP 6: 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

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> Use vehicle-cleaning devices, for example, ramps or wash down areas.

ESCoP 7: 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 project activities. Construction activities, especially earthworks, will change topography, disturb the natural rainwater/flood water drainage, and change the local landscape.	<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 facilities, etc.) are conducive to enhance natural draining of rainwater/flood water; 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 the uncovered open surface immediately with no use of construction activities with grass-cover and tree plantation to prevent soil erosion and bring improved landscaping.

ESCoP 8: 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 Cover haul vehicles carrying dusty materials moving outside the construction site Impose speed limits on all vehicle movement at the worksite to reduce dust emissions Control the movement of construction traffic Water construction materials prior to loading and transport Service all vehicles regularly to minimize emissions Limit the idling time of vehicles not more than 2 minutes.
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 Focus special attention on containing the emissions from generators

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> • Machinery causing excess pollution (e.g. visible smoke) will be banned from construction sites • Service all equipment regularly to minimize emissions • Provide filtering systems, duct collectors or humidification or other techniques (as applicable) to the concrete batching and mixing plant to control the particle emissions in all its stages, including unloading, collection, aggregate handling, cement dumping, circulation of trucks and machinery inside the installations
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 high risk periods (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 • Crushing of rocky and aggregate materials shall be wet-crushed, or performed with particle emission control systems.

ESCoP 9: 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 • Ensure all drivers 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 machinery	Noise and vibration may have an impact on	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Appropriately site all noise generating activities to avoid noise pollution to local residents • Use the quietest available plant and equipment

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	people, property, fauna, livestock and the natural environment.	<ul style="list-style-type: none"> • Modify equipment to reduce noise (for example, noise control kits, lining of truck trays or pipelines) • Maintain all equipment to keep it in good working order in accordance with manufacturers maintenance procedures. Equipment suppliers and contractors shall present proof of maintenance register of their equipment. • Install acoustic enclosures around generators to reduce noise levels. • Fit high efficiency mufflers to appropriate construction equipment • Avoid the unnecessary use of alarms, horns and sirens.
Construction activities	Noise and vibration may impact 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.

ESCoP 10: Protection of Flora

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Vegetation clearance	Local flora is important to provide shelters for the birds, offer fruits and/or timber/fire wood, protect soil erosion, and keep the environment very friendly to human living. As such damage to flora has wide range of adverse environmental impacts.	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Reduce disturbance to surrounding vegetation • Use appropriate type and minimum size of machine to avoid disturbance to adjacent vegetation. • Get approval from supervision consultant for clearance of vegetation. • Make selective and careful pruning of trees where possible to reduce need of tree removal. • Control noxious weeds by disposing of at designated dump site or burn on site. • Clear only the vegetation that needs to be cleared in accordance with the plans. These measures are applicable to both the construction areas as well as to any associated activities such as sites for stockpiles, disposal of fill and construction of diversion roads, etc.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> Do not burn off cleared vegetation – where feasible, chip or mulch and reuse it for the rehabilitation of affected areas, temporary access tracks or landscaping. Mulch provides a seed source, limiting embankment erosion, retaining soil moisture and nutrients, and encourages regrowth and protection from weeds. Return topsoil and mulched vegetation (in areas of native vegetation) to approximately the same area of the roadside it came from. Avoid work within the drip-line of trees to prevent damage to the tree roots and compacting the soil. Minimize the time the ground is exposed or excavation left open by clearing and re-vegetating the area at the earliest possible time. Ensure excavation works occur progressively and revegetation done at the earliest Provide adequate knowledge to the workers regarding nature protection and the need of avoid felling trees during construction Supply appropriate fuel in the work caps to prevent fuel wood collection

ESCoP 11: Protection of Fauna

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction activities	The location of construction activities can result in the loss of wild life habitat and habitat quality.	<p>The Contractor shall</p> <ul style="list-style-type: none"> Limit the construction works within the designated sites allocated to the contractors Check the site for animals trapped in, or in danger from site works and use a qualified person to relocate the animal.
	Impact on migratory birds, its habitat and its active nests	<p>The Contractor shall</p> <ul style="list-style-type: none"> Not be permitted to destruct active nests or eggs of migratory birds Minimize the tree removal during the bird breeding season. If works must be continued during the bird breeding season, a nest survey will be conducted by a qualified biologist prior to commence of works to identify and located active nests Minimize the release of oil, oil wastes, or other substances harmful to migratory birds to any waters or areas frequented by migratory birds.
Vegetation clearance	Clearance of vegetation may impact shelter, feeding and/or breeding and/or physical destruction and severing of habitat areas	<p>The Contractor shall</p> <ul style="list-style-type: none"> Restrict the tree removal to the minimum required. Retain tree hollows on site, or relocate hollows, where appropriate Leave dead trees where possible as habitat for fauna Fell the hollow bearing trees in a manner which reduces the potential for fauna mortality. Felled trees will be inspected after felling for fauna and if identified and readily accessible will be

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		removed and relocated or rendered assistance if injured. After felling, hollow bearing trees will remain unmoved overnight to allow animals to move of their own volition.
Construction camps	Illegal poaching	The Contractor shall <ul style="list-style-type: none"> • Provide adequate knowledge to the workers regarding protection of flora and fauna, and relevant government regulations and punishments for illegal poaching.

ESCoP 12: Protection of Fisheries

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction activities in River and Floodplain Water	The main potential impacts to fisheries are hydrocarbon spills and leaks from riverine transport and disposal of wastes into the river and floodplain water	The Contractor shall <ul style="list-style-type: none"> • Ensure the riverine transports, vessels and ships are well maintained and do not have oil leakage to contaminate river water. • Contain oil immediately on river in case of accidental spillage from vessels and ships and in this regard, make an emergency oil spill containment plan to be supported with enough equipment, materials and human resources • Do not dump wastes, be it hazardous or non-hazardous into the nearby water bodies or in the river.
	The main potential impacts to aquatic flora and fauna River are increased suspended solids from earthworks erosion, sanitary discharge from work camps, and hydrocarbon spills	The Contractor shall <ul style="list-style-type: none"> • follow mitigation measures proposed in ECoP 3: Water Resources Management and EC4: Drainage Management
Construction activities on the land	Filling of ponds for site preparation will impact the fishes	The Contractor shall <ul style="list-style-type: none"> • Inspect any area of a water body containing fish that is temporarily isolated for the presence of fish, and all fish shall be captured and released unharmed in adjacent fish habitat • Install and maintain fish screens etc. on any water intake with drawing water from any water body that contain fish.

ESCoP 13: 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.	The Contractor shall <ul style="list-style-type: none"> • Prepare and submit a traffic management plan to the DSM 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

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<p>road, temporary bridges temporary diversions, necessary barricades, warning signs / lights, and road signs.</p> <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

ESCoP 14: 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 acceptable areas from an 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 DSM 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

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		surveillance over public health, social and security matters
Construction Camp Facilities	Lack of proper infrastructure facilities, such as housing, water supply and sanitation facilities will increase pressure on the local services and generate substandard living standards and health hazards.	<p>The Contractor shall provide the following facilities in the campsites:</p> <ul style="list-style-type: none"> • Adequate housing for all workers • Safe and reliable water supply. Water supply from deep tube wells of 300 m depth that meets the national standards • 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. • Treatment facilities for sewerage of toilet and domestic wastes • Storm water drainage facilities. Both sides of roads are to be provided with shallow v drains to drain off storm water to a silt retention pond which shall be sized to provide a minimum of 20 minutes retention of storm water flow from the whole site. Channel all discharge from the silt retention pond to natural drainage via a grassed swale at least 20 meters in length with suitable longitudinal gradient. • Paved internal roads. Ensure with grass/vegetation coverage to be made of the use of top soil that there is no dust generation from the loose/exposed sandy surface. Pave the internal roads of at least haring-bond bricks to suppress dusts and to work against possible muddy surface during monsoon. • Provide child crèches for women working construction site. The crèche shall have facilities for dormitory, kitchen, indoor and outdoor play area. Schools shall be attached to these crèches so that children are not deprived of education whose mothers are construction workers • Provide in-house community/common entertainment facilities dependence of local entertainment outlets by the construction camps to be discouraged/prohibited to the extent possible.
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.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> • 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 from entering and playing. • 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 to discourage them from using fuelwood 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 and protecting the project area's biodiversity and wildlife, and relevant government regulations and punishments on wildlife protection.
Health and Hygiene	There will be a potential for diseases to be transmitted including malaria, exacerbated by inadequate health and safety practices. There will be an increased risk of work crews spreading sexually transmitted infections and HIV/AIDS. Special attentions should be paid to limit the spread of COVID-19	<p>The Contractor shall</p> <ul style="list-style-type: none"> • Provide adequate health care facilities within construction sites. • Provide first aid facility round the clock. Maintain stock of medicines in the facility and appoint fulltime designated first aider or nurse. • Provide ambulance facility for the laborers during emergency to be transported to nearest hospitals. • Initial health screening of the laborers coming from outside areas • Train all construction workers in basic sanitation and health care issues and safety matters, and on the specific hazards of their work • Provide HIV awareness programming, including STI (sexually transmitted infections) and HIV information, education and communication for all workers on regular basis • Complement educational interventions with easy access to condoms at campsites as well as voluntary counseling and testing

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> • Provide adequate drainage facilities throughout the camps to ensure that disease vectors such as stagnant water bodies and puddles do not form. Regular mosquito repellent sprays during monsoon. • Carryout short training sessions on best hygiene practices to be mandatorily participated by all workers. Place display boards at strategic locations within the camps containing messages on best hygienic practices • Regular temperature checking, strict use of PPE including masks should be ensured • Sanitization facility should be established
Safety	In adequate safety facilities to the construction camps may create security problems and fire hazards	<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. • 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 • Special supervisions, training session to avoid GBV/SEA/SH within the camps
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. • Dismantle camps in phases and as the work gets decreased and not wait for the entire work to be completed • Give prior notice to the laborers before demolishing their camps/units • Maintain the noise levels within the national standards during demolition activities • Different contractors shall be hired to demolish different structures to promote recycling or reuse of demolished material. • Reuse the demolition debris to a maximum extent. Dispose remaining debris at the designated waste disposal site. • Handover the construction camps with all built facilities as it is if agreement between both parties (contractor and land-owner) has been made so.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> Restore the site to its condition prior to commencement of the works or to an agreed condition with the landowner. Not make false promises to the laborers for future employment in O&M of the project.

ESCoP 15: Cultural and Religious Issues

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction activities near religious and cultural sites	Disturbance from construction works to the cultural and religious sites, and contractors lack of knowledge on cultural issues cause social disturbances.	<p>The Contractor shall</p> <ul style="list-style-type: none"> Communicate to the public through community consultation and newspaper announcements regarding the scope and schedule of construction and certain construction activities causing disruptions or access restriction. Do not block access to cultural and religious sites, wherever possible Restrict all construction activities within the foot prints of the construction sites. Stop construction works that produce noise (particularly during prayer time) shall there be any mosque/religious/educational institutions close to the construction sites and users make objections. Take special care and use appropriate equipment when working next to a cultural/religious institution. Stop work immediately and notify the site manager if, during construction, an archaeological or burial site is discovered. It is an offence to recommence work in the vicinity of the site until approval to continue is given by the DSM/PIU. Provide separate prayer facilities to the construction workers. Show appropriate behavior with all construction workers especially women and elderly people Allow the workers to participate in praying during construction time Resolve cultural issues in consultation with local leaders and supervision consultants Establish a mechanism that allows local people to raise grievances arising from the construction process. Inform the local authorities responsible for health, religious and security duly informed before commencement of civil works so as to maintain effective surveillance over public health, social and security matters

ESCoP 16: 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	<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.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	<p>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>	<p>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')</p> <ul style="list-style-type: none"> • 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 works and establishment of construction camps so as to maintain effective surveillance over public health, social and security matters. • Provision of fine or handover to the law enforcing agency in case of any forced labor issues. • Health and safety related to COVID-19 including appropriate PPE and sanitization facilities
	Child and pregnant labor	<p>The Contractor shall</p> <ul style="list-style-type: none"> • not hire children of less than 18 years of age and pregnant women or women who delivered a child within 8 preceding weeks, in accordance with the Bangladesh Labor Code, 2006
Accidents	Lack of first aid facilities and health care facilities in the immediate vicinity will aggravate the health conditions of the victims	<ul style="list-style-type: none"> • Provide health care facilities and first aid facilities are readily available. Appropriately equipped first-aid stations shall be easily accessible throughout the place of work • Document and report occupational accidents, diseases, and incidents. • Prevent accidents, injury, and disease arising from, associated with, or occurring in the course of work by minimizing, so far as reasonably practicable, the causes of hazards. In a manner consistent with good international industry practice. • Identify potential hazards to workers, particularly those that may be life-threatening and provide necessary preventive and protective measures. • Provide awareness to the construction drivers to strictly follow the driving rules

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction Camps	Lack of proper infrastructure facilities, such as housing, water 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"> • Provide adequate lighting in the construction area and along the roads • The Contractor shall provide the following facilities in the campsites to improve health and hygienic conditions as mentioned in ECoP 17 Construction Camp Management • Adequate ventilation facilities • Safe and reliable water supply. Water supply from deep tube wells that meets the national standards • Hygienic sanitary facilities and sewerage system. The toilets and domestic waste water will be collected through a common sewerage. • Treatment facilities for sewerage of toilet and domestic wastes • Storm water drainage facilities. • Recreational and social facilities • Safe storage facilities for petroleum and other chemicals in accordance with ECoP 2 • Solid waste collection and disposal system in accordance with ECP1. • Arrangement for trainings • Paved internal roads. • Security fence at least 2 m height. • Sick bay and first aid facilities
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.
Other ECoPs	Potential risks on health and hygiene of construction workers and general public	<p>The Contractor shall follow the following ECPs to reduce health risks to the construction workers and nearby community</p> <ul style="list-style-type: none"> • ECoP 2: Fuels and Hazardous Goods Management • ECoP 4: Drainage Management • ECoP 10: Air Quality Management • ECoP 11: Noise and Vibration Management • ECoP 15: Road Transport and Road Traffic Management • ECoP 16: River Transport management
Trainings	Lack of awareness and basic knowledge in health care among the construction workforce, make them susceptible to potential diseases.	<p>The Contractor shall</p> <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 and communicable diseases. • 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

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<p>emergency procedures for fire, evacuation, and natural disaster, as appropriate.</p> <ul style="list-style-type: none"> • Commence the malaria, HIV/AIDS and STI education campaign before the start of the construction phase and complement it with a strong condom marketing, increased access to condoms in the area, and 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. • Provision of wearing masks, PPE, sanitizer shall be ensured. • Preparation of Gender and SEA/SH Action Plan which details the relevant mitigation measures both preventive and curative, and as well includes specific actions to promote gender and women empowerment.

ESCoP 17: Security Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Absence of Proper Security Management	May affect the project economically and also result in loss of resources	<p>The contractor shall ensure</p> <ul style="list-style-type: none"> - Code of conduct, behavior commitments, clear and accessible disciplinary process, and grievance process; - Engagement with communities about the project's impacts on community safety and security, awareness raising concerning the Code of Conduct commitment and project grievance mechanism, as outlined in the Stakeholder Engagement Plan (SEP) - Policy on "use of force" and clarity on proportionality to risk. The use of force by direct or contracted workers in providing security should not be sanctioned except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. - Incident reporting: means of receiving and reporting incidents and allegations, and guidelines for receiving and following up on them, including procedures for reporting to the Borrower and the Bank, as required. - Site access control: guidelines for security personnel on how to interact with community members seeking access to a project site or raising a concern (for example, training on the grievance mechanism and Code of Conduct). - Any allegations of criminal behavior should be reported to relevant authorities, whether from private or public security, employees or contractors. - If gender-based violence or sexual exploitation and abuse issues arise or are alleged during project implementation or supervision, Bank Management must be alerted immediately. Security-related allegations or incidents can

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		include issues such as theft, abuse of power and retaliation, sexual harassment and exploitation, gender-based violence, and bribery and corruption. ¹⁴

¹⁴ <https://documents1.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English>

Annex E: Terms of Reference (ToR) of the ESIA Study

Introduction: World Bank is currently funding a regional infrastructure development program involving Bangladesh, Nepal, Bhutan, and India. The proposed program, titled “BBIN Regional Transport and Trade Facilitation Program” adopts a Multiphase Programmatic Approach (MPA) and will be implemented in several phases over a period of 10-12 years.

Phase 1 of the Program will comprise of US\$730m in IDA financing in total: for Bangladesh (US\$480m) and Nepal (US\$250m). In Bangladesh, the Program include 3 (three) components: (a) upscaling and modernization of 3 land ports at Bhomra, Benapole and Burimari with Bangladesh Land Port Authority (BLPA) as implementing agency (IA) (b) the development of automated border management systems at selected border points to be implemented by National Board of Revenue (NBR), and c) technical assistance to support the implementation of the WTO Trade Facilitation Agreement (TFA) with Ministry of Commerce (MoC). The works are expected to include, among other things, warehouses, stack yards, truck terminal, chassis terminal, passenger shed, godown (warehouse), a passenger terminal with parking area, transshipment yard, mosque, workshop, medical center, pedestrian road laboratories and the required-service facilities and buildings. A consulting firm will prepare the scope of development for phase 1 under the new BBIN Program.

Given the extend of the project, the potential environmental and social risks and impacts of the program could be adverse and significant, covering a larger area of influence. Land acquisition and involuntary resettlement will be very insignificant and few number of mature trees will be felled down along the considered Right of Way (RoW). Environment, occupational and community health, safety, and labour issues will also be significant, particularly along the corridor and transport and access routes during construction. This Environmental and Social Management Framework (ESMF) is required to draft for the project to identify the required environmental and social management measures that need to be taken by the project authorities in IAs during the planning, design, construction and operations of the project, in order to ensure compliance with the Government of Bangladesh own requirements and those of the World Bank.

The risks and impacts of project interventions cannot be determined until the program or subproject details have been identified. Therefore, an ESMF was prepared for this project during appraisal mainly to address the potential environmental and social, labour, Environment, Health and Safety (EHS) and stakeholder’s engagement issues related to individual IA’s sub-projects to be implemented under the project. All the potential major environmental and social impacts along with mitigation and management measures have been compiled in the form of ESMF. More particularly, this ESMF highlights the requirements related to the 10 Environment and Social Standards (ESSs) of the World Bank Environmental and Social Framework (ESF).

Objectives of the ESIA: The objective of the assignment is to carry out the tasks related to environmental aspects in light of the ToR. These include preparation of the Environmental Impact Assessment (including ESMP) of the BRSP.

Scope of Services: Carry out an overall Environmental and Social Impact Assessment (ESIA) and prepare Environmental and Social Management Plan (ESMP) for the project area covered under the project. ESIA and ESMP would be prepared according to the World Bank ESSs and the GoB procedures. The Consultant shall familiarize themselves with the project details and components. The Consultant should interact with other preparation consultants of PIU to determine best way of conducting environment activities. Consultant shall appropriately plan the timing of the deliverables.

The major activities to be carried out will include, but not limited to the following:

A. Review the ESMF Report

- a. Review of the ESMF report;
- b. Review the preliminary Baseline report prepared on the basis of reconnaissance field investigations carried out during ESMF preparation;

- c. Determine any gaps particularly in the ESMF;

B. Review the Project details

- a. Obtain from the IA and PIU consultants all the details about the project;
- b. Hold meetings with the PIU team to understand the scope and nature of work;

C. Scoping

- a. Carry out reconnaissance field visit. On the basis of this field visit and review of the project details, carry out scoping for the ESIA study. Screen out the impacts that are not likely to take place and prepare a list of potential impacts that are likely to take place.
- b. Prepare criteria to be used to determine the program influence area for conducting ESIA;
- c. Specify the boundaries of the study area for the assessment (project influence area): canal area, river basin/catchments, land use, the drainage area and patterns, aquaculture and other development interventions – current and proposed, watersheds, access to sensitive/remote areas such as parks/ reserves/forests/agriculture land, elements of transport development program in the area.

D. Describe the Proposed Project

- a. Provide information on the following: location of all project-related development sites and general layout and extent of facilities at project-related development sites; diagrams/drawings of proposed structures; design basis, size, capacity; preconstruction activities; construction activities (land clearing, land grading, worker camps, if any), schedule, staffing and support, facilities and services; operation and maintenance activities, staffing and support, facilities and services; management of risks, including health and safety; life expectancy for major components. Components may include any or all of the following: structural measures; dikes and levees; drainage, and nonstructural measures, service road and route(s), adjustments to alignments of canals, including earthworks; fish passes and regulator, repair/replacement of infrastructures; and resettlement sites. Also describe sources of materials used during proposed works; generation of wastes and their disposal, expected volume of use, construction-related vehicular traffic; resettlement, land acquisition, safety features; staffing and accommodation of employees, including site clearance, scheduling of project activities, approximate quantity and likely source of construction materials.
- b. Provide maps and diagrams with appropriate scales to illustrate the general setting of project-related development sites and key project components. These maps and diagrams shall include overall project layout, details of individual components, project time schedule, and any related aspects.

E. Analysis of Alternatives

- a. An examination and evaluation of the project and potential alternative of not proceeding with it will be taken into consideration in the ESIA. The evaluation will include:
 - An analysis of the alternative means of carrying out the Project, including need for the project, alternative sites, alternate projects and variations to the scope of the project (major components included and excluded) and if any of the alternatives could result in a minimization of adverse impacts. A comparison of their environmental and technical performance potential and other relevant variables will be included for the project components.
 - A discussion on the status of any ongoing analyses, including a discussion of the options not chosen and the rationale for their exclusion.
 - Contingency plans if major project components or methods prove infeasible or do not perform as expected; and

- The implications of a delay in proceeding with the Project, or any phase of the Project.
- Examination of the 'do nothing' alternative

F. Description of the Environment

- a. Review the Baseline report prepared as part of the ESMF of the project and identify gaps if any. Obtain additional data as needed.
- b. Assemble and evaluate and baseline data on the environmental characteristics of the study area, including river basin/watershed, construction, resettlement sites, inundation, floodplain, and biological features (habitats and rare species, vegetation, fisheries, birds, terrestrial fauna), and floodplain (recession) agriculture. Include information on any changes anticipated before the project commences.
- c. Physical environment: geology, topography, soils, climate, surface and ground water hydrology, annual peak discharge, ambient air quality; noise; vehicular traffic; recurrence intervals of various peak discharges and peak stages of various discharges, erosion and sediment loading, existing/projected pollution discharges and receiving water quality; instances of flooding, siltation/erosion, depth, bottom topography of the rivers;
- d. Biological environment: ecology: flora and fauna, including rare or endangered species; sensitive natural habitats, including sanctuaries and reserves; biological connectivity; potential vectors for disease; exotics and aquatic weeds; application of pesticides and fertilizers (current and projected as agriculture production is expected to be increased);
- e. Socio-cultural environment: land use (including current crops and cropping patterns; fisheries and farm outputs and inputs; transportation; land tenure and land titling; present water supply and water uses (including current distribution of water resources); control over allocation of resource use rights; water and fisheries related human health problems; cultural sites, present and projected population; present land use/ownership; planned development activities; community structure; present and projected employment by industrial category; distribution of income, goods and services; recreation; public health; cultural properties; indigenous peoples, customs and aspirations; significant natural, cultural or historic sites, etc. Presence of HIV/AIDS and other sexually transmitted diseases;
- f. Provide location and union/upazila wise information on the project intervention and identify any critical aspects that need special consideration during design, construction and operation.

G. Stakeholder consultations

- a. Consultations need to be carried out at least twice, in accordance with the WB requirements: (a) shortly after environmental screening and before the terms of reference for the ESIA is finalized; and (b) once a draft ESIA report is prepared.
- b. Review the consultations carried out during the ESMF.
- c. Carry out consultations with institutional stakeholders including but not limited to officials from DoE, MoC, BLPA, RHD, BGB and also with local, national, and international NGOs, and other organization as appropriate and relevant.
- d. Carry out comprehensive consultations with primary stakeholders, particularly the communities to be positively and negatively affected by the project.
- e. Relevant materials will be provided to affected groups in a timely manner prior to consultations and in a form and language that is understandable and accessible to the groups being consulted. The Consultant should maintain a record of the public consultation (written and video and pictorial proof) and the records should indicate: means other than consultations (e.g., surveys) used to seek the views of affected stakeholders; the date and location of the consultation meetings, a list of the attendees and their affiliation and contact address; and, summary minutes.

H. Determination of the Potential Impacts of and Impacts on the Proposed Project

- a. Review the impact assessment carried out during the ESMP and identify gaps if any.
- b. Review the ESMP compliance for the ESMF, particularly review the institutional setup, implementation of mitigation measures, environmental monitoring and documentation, environmental monitoring reports, environmental quarterly progress reports, and other reports. Determine gaps if any; also determine impracticality and or inappropriateness of any ESMP aspect such as institutional set up, mitigation measures, monitoring measures, and others.
- c. This analysis will require in depth interpretation. This analysis distinguishes between significant positive and negative impacts, direct and indirect impacts, and immediate and long-term impacts. Identify impacts that are unavoidable or irreversible. Wherever possible, describe impacts quantitatively, in terms of environmental costs and benefits. Assign economic values when feasible. Characterize the extent and quality of available data, explaining significant information deficiencies and any uncertainties associated with predictions of impact. Compare the impact with the baseline. Provide ToRs for studies to obtain the missing information. Special attention should be given to the environmental impact those identified during the screening process of ESMF.

I. Development of an Environmental and Social Management Plan (ESMP)

- a. Review the ESMP included guideline in the ESMF.
- b. Identify key mitigation and enhancement approaches and prepare the impact specific mitigation measures. Estimate the mitigation measures' impacts and costs and the institutional and training requirements to implement them. If appropriate, assess compensation to affected parties for impacts that cannot be mitigated. Prepare an ESMP, including proposed work programs, budget estimates, schedules, staffing and training requirements, and other necessary support services to implement the mitigating measures, monitoring, etc. Include measures for emergency response to accidental events (e.g., entry of raw sewage or toxic wastes into rivers, streams).
- c. Prepare a detailed plan to monitor the implementation of mitigating measures and the impacts of the project during rehabilitation and operation (e.g., emission and ambient levels of pollutants where these may be detrimental to human health, soil erosion, changes in the floodplain). Include in the plan an estimate of capital and operating costs and a description of other inputs (such as training and institutional strengthening) needed to implement the plan. Include a regular schedule of monitoring the quality of surface and ground waters to ensure that mitigation measures are effective. Provide guidance for reporting and enforcement and conducting environmental audits.
- d. Estimate the costing of ESMP, environmental and social code of practices (ESCoPs) and provide necessary clauses for incorporating in the bid document.
- e. Review the responsibilities and capability of institutions at local, provincial/regional, and national levels and recommend steps to strengthen or expand them so that the ESMP may be effectively implemented. The recommendations may extend to new laws and regulations, new agencies or agency functions, inter-sectoral arrangements, management procedures and training, staffing, operation and maintenance training, budgeting and financial support.
- f. An outline of the contents of the ESMP to be included in the project's Operational Manual should be provided along with environmental/social protection clauses for contracts and specifications.
- g. Define the roles and responsibilities of officials, staff, consultants, and IA's contractors on environmental and social management.
- h. Describe in details who will (a) implement the environmental mitigation activities (b) carrying out environmental monitoring; (c) supervise environmental mitigation and monitoring; (d) design, implement and apply the environmental management information system (EMIS); and (e) prepare quarterly progress report on environmental management;

ESIA Report Compilation

- a. Finalize the draft ESIA incorporating the comment from the consultation (see Annex D for the ESIA structure);
- b. Translate and finalize the executive summary of ESIA in Bengali.

Team composition and qualifications:

The assignment requires interdisciplinary analysis with specialized sector knowledge (i.e., ecology, fisheries, marine sciences, water resource and hydrology). The general skills required of the Environmental Safeguard team are: environmental management planning, civil engineer(s), with particular experience in road projects, river/canal re-excavation, general construction, growth center establishment, wildlife and aquatic biologist depending upon the predicted impacts, land use planner, sociologist, archaeologist and communications/stakeholder engagement. The consulting team must be able to demonstrate appropriate skill mix and depth of experience to cover all areas of the proposed analysis, including incorporation of other specialized skill sets where required. A Team Leader shall lead the consulting team with at least 10 years of experience leading ESIA studies, including prior international experience on similar types of LGED projects, and prior experience as either team leader or deputy team leader on at least one (1) previous major ESIA for World Bank funded projects.

Reporting

The consultant will report to the Project Director, BBIN MPA.

Annex F: Outline of ESIA Reports

Executive Summary

This should be standalone and concisely provides a good summary of the project, the policy, and regulatory frameworks, summary of consultations with critical stakeholders, a summary of key baseline information relevant to the analysis of key impacts, a summary of key and site-specific impacts, a summary of key measures to address land port-specific impacts, implementation arrangements for the ESMP with an estimated budget. The ES should be accompanied by a good and readable map showing the port's location, connecting transport corridors, and locations of ancillary facilities.

Chapter 1: Project Description

Describes the physical components of the port in full detail, including location, size, design elements, components, ancillary facilities such as borrow pits, quarry sites, workers camps, disposal areas, hauling & transport routes, etc. Maps, photos, and design details should be included. Estimates of resources required during construction and operation phases should be provided, with supporting calculations in annexes.

Chapter 2: Legal and Institutional Framework

These needs include an evaluation of the local laws and regulations (including relevant laws, regulations, and institutions on labor & working conditions and health & safety) vis a vis, the new ESF and 10 ES Standards, GBV Good Practice Note, World Bank Group EHS Guidelines and Industry Sector Guidelines for Construction Material Extraction and relevant international treaties and protocols.

Chapter 3: Description of Environment (Baseline Data)

A specific description of the environment (Physical, Biological, and Socio-Economic) for each port and the surrounding area, its component activities, and ancillary facilities are required to ensure that key baseline information is up-to-date. In addition, baseline data for ESS2 and ESS4 will need to be collected.

Chapter 4: Stakeholder Engagement and Public Consultations

It should summarize the consultation processes, dates of consultations, who were consulted, issues raised, and how issues will be addressed by the project for each of the ports.

Information on the consultation process, dates of consultations, the person/ institutions consulted, issues raised, and how the project address issues and should.

Chapter 5: Environmental and Social Risks and Impacts

It is suggested to separate risk and impact assessment from mitigation. Thus, this chapter should focus on assessing the risks and impacts of the project related to all other relevant standards (ESS2, ESS3, ESS4, ESS5, ESS6, ESS7, ESS8), including stakeholder engagement, vulnerable groups, and assessment and management of environmental and social risks and impacts of contractors.

In addition, this chapter also needs to include cumulative impact assessment following IFC Good Practice Handbook on Cumulative Impact Assessment. This also needs to have indirect and induced impacts of the port development on valued ecosystem components.

It is suggested that a summary table be provided showing the locations, sensitive receptors, distance of the receptors from the project, and how the project will impact sensitive receptors.

Chapter 6: Mitigation Measures

This will be the ESMP, which should demonstrate the application of mitigation hierarchy (i.e., avoidance, minimization, mitigation, offset/ compensation) and should cover both generic mitigation measures for noise, dust, pollution, health & safety, etc. and site-specific measures for sensitive receptors, monitoring & audit, including grievance redress.

Where possible, technical specifications should be provided for generic and site-specific measures that can be readily adopted in the bidding documents.

This chapter should accompany a table summarizing the project phase, activities, risks & impacts, management measures that apply the mitigation hierarchy, responsible party, and indicative budget.

It should specify specific plans that will be prepared and implemented by the contractor before site mobilization, including but not limited to the Construction-ESMP, Traffic Management Plan, Health and Safety Plan, Labor Influx Management Plan, Workers' Camp Management Plan, Spoils Disposal Management Plan, Site Rehabilitation and Restoration Plan, Waste Management Plan, Material Extraction Plan, Gender and Gender-Based Violence Action Plan etc.

The detailed specifications for the bidding documents' environmental, social, health, and safety (ESHS) requirements will be consistent with standard requirements in the Bank's 2017 SBD documents for ICB.

- a. The following needs to be clearly outlined:
- b. Unit cost and quantity of the mitigation measures
- c. Minimum specification of the measures
- d. Timing to implement the mitigation activities
- e. Provisions to be made in the contract (as a part of Special Condition of Contract) for Supervision Consultant and the Contractor

Chapter 7: Analysis of Alternatives

This chapter should assess and present different alternatives, including phased development, degree of mechanization during construction, the pace of construction, construction techniques, without the project scenario, etc. The pros and cons should be presented and rationale for their selection over other options.

Chapter 8: Key measures and actions for the Environmental and Social Commitment Plan (ESCP)

This summarizes key measures and actions and the timeframe required for the project to meet the requirements of the ESSs. This will build on the ESMP proposed under Chapter 6.

Chapter 9: Institutional Arrangements

This will be the Implementation Arrangements for the ESMP, including safeguard capacity assessment and staffing among the Employer, Construction Supervision Consultant (CSC), and Contractors.

In addition, this chapter should make clear the minimum EHS staffing at BLPA, Contractor, and the CSC.

The chapter should also outline the institutional arrangements during the operation phase, especially regarding environmental and social issues management.

Annex G: Outline of Labor Management Procedures

The Labor Management Procedures (LMP) is prepared to meet the objectives and requirements of the World Bank Environmental and Social Framework (ESF) Environmental and Social Standards (ESSs) 2 and 4 as well as the national Labor Laws of Bangladesh. This LMP assesses the potential risks and impacts of assignment of labor for the implementation of the Project activities by the Implementing Agencies (IAs)— and addresses them through mitigation measures in line with ESSs and Bangladesh Labor policies and provisions.

Various types of workers (Direct and Contracted), their estimated numbers, characteristics etc, as well as key potential environmental and social risks—such as unscrupulous labor practices, Occupational Health and Safety (OHS) issues, community risks, exclusion of the disadvantaged and the vulnerable from project benefit and engagement, exploitation of child/ forced/trafficked labor/beneficiaries as well potential health and safety issues while working under COVID-19 pandemic situation, are assessed and presented in an LMP. Mitigation measures to reduce such risks depend on the project's size, the potential Environmental and Social (ES) risks and impacts, the capacity of the implementing agencies to manage and mitigate the ES risks, and the context under which the project is being implemented.

Provisions of ESSs, Labor Act 2006 (including Amendments of 2013 and 2018), National Child Labor Elimination Policy 2010. Governmental and WHO guidelines for COVID-19 etc, should be studied to meet requirement and obligations. Major points of consideration that include Conditions of Employment, OHS, and Child/Forced Labor etc. have also been referred to as guidelines. Finally, a Grievance Redress Mechanism (GRM) for workers has to be established to raise any potential dissatisfaction or concern by anyone employed by the IAs and the PMUs.

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1.6 Activity Level Environmental and Social Risk Management Responsibilities

2. Labour Use on the Project

2.1 Categorization of the Workforce

2.2 Project Labour Requirements

3. Potential Labour Risks

4. Overview of Labour Legislation

5. Roles and Responsibilities for Project Labour Management

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5.2 RHD

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5.4 RHD

6. Project Labour Policies and Procedures

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6.2 Age of Employment

6.3 Occupational Health and Safety

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6.3.2 Sexual Exploitation and Abuse and Sexual Harassment

6.3.3 Workers' Grievance Management

Annex 1: WHO Guidance on OHS and Covid-19 Outbreak

Annex 2: Code of Conduct for direct workers (other) and contracted workers

Annex H: Outline of Resettlement Policy Framework

An RPF can be prepared as part of the Environmental and Social Management Framework (ESMF) to provide guidance to client and implementing agencies in situations where sub-component/components may require the use of land on a temporary or permanent basis and/or through voluntary land donations. Accordingly, the RPF is prepared to set out the policies and procedures for preventing or mitigating adverse impacts related to involuntary land acquisition and resettlement because of proposed project and sub-projects. The RPF set also the process that need to be duly implemented regarding voluntary donation.

The purpose of the resettlement policy is to ensure that people and households affected by the project can maintain or improve their pre-project living standards. The objective of the RPF is to minimize involuntary resettlement and to provide a framework for assessing concerns of PAP and PAH who may be subject to loss of land, assets, livelihoods and well-being or living standards because of the construction of proposed project/sub-projects.

The RPF establishes guidelines for determining land loss eligibility and includes a description of what a voluntary land donation might entail. The RPF does not have comprehensive baseline information to define detailed compensation packages. These determinations can be completed at the Abbreviated Resettlement Action Plan (ARAP) or Resettlement Action Plan (RAP) stage of project implementation when more comprehensive and up-to-date project information is available.

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 - 2.2.2 The Acquisition and Requisition of Immovable Property Ordinance, 1982
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 - 2.3.2 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS-5)
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 - 3.1 Project Development Objective
 - 3.2 Project Description
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 - 3.2.1.2 Component 2: Enhance trade sector coordination and productive capacity (managed by Ministry of Commerce, WTO Cell)
 - 3.2.1.3 Component 3: National Single Window Implementation and Strengthening Customs Modernization (US\$67 million)
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 - 3.2.3 Proposed Developments
 - 3.3 Implementing Agency and other Agencies Present at the Border
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5.9.2 Scope of GRM

5.9.4 Phase One - GRM under Safeguard Issues

5.9.4 Phase Two – Establishment of Implementation Arrangements for Setting up Project Level GRM

5.9.5 Legal Options to Aggrieved Parties

5.9.6 Grievance Redress Service of The World Bank

5.10 Institutional Arrangements and Capacity Enhancement

5.11 Monitoring, Evaluation and Assessment

5.11.1 Social Monitoring Indicators

5.11.2 Capacity Enhancement

5.12 RPF Budget

5.13 non-Negotiables

Annex I: Outline of Resettlement Action Plan

The Resettlement Action Plan (RAP) outlines the procedures that the project implementing agency will follow and the actions that it will take to mitigate adverse effects, compensate losses, and provide development benefits to persons and communities affected by an investment project.

In accordance with ESS 5, the RAP follows these principles-

- 1) involuntary resettlement should be avoided
- 2) where involuntary resettlement is unavoidable, affected people should be compensated fully, and fairly for lost assets
- 3) involuntary resettlement should be conceived as an opportunity to improve the livelihoods of the affected people, and, undertaken accordingly; and,
- 4) people affected by involuntary resettlement, should be consulted, and involved in resettlement planning, to ensure that mitigation, and benefits are appropriate and sustainable.

Given that involuntary resettlement entails both the physical displacement of peoples, and the disruption of their livelihoods, a RAP details the outline of the rights, roles, and responsibilities of all parties involved in involuntary resettlement. The RAP must identify the full range of people affected by the project and justify their displacement after consideration of alternatives that would minimize or avoid displacement. The RAP outlines eligibility criteria for affected parties, establishes rates of compensation for lost assets, and describes levels of assistance for relocation and reconstruction of affected households.

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Annexure

Annex J: Example Outline of Environmental and Social Commitment Plan (ESCP)

The GoB will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions.

Where the ESCP refers to specific plans or other documents, whether they have already been prepared or are to be developed, the ESCP requires compliance with all provisions of such plans or other documents. In particular, the ESCP requires compliance with the provisions set out in the ESMF/ESMP, SEP, LMP, RAP and GAP.

The table below summarizes the material measures and actions that are required as well as the timing of the material measures and actions. GoB is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1 above.

Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by GoB as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.

As agreed by the Bank and GoB, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, GoB will agree to the Bank's changes and update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the GoB. The GoB will promptly disclose the updated ESCP.

Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the GoB shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include relevant environmental and social risks (including, but not limited to health and safety impacts, labor influx, Gender Based Violence (GBV) etc.).