



People's Republic of Bangladesh

Bangladesh Land Port Authority (BLPA),
Roads and Highway Department (RHD),
National Board of Revenue (NBR)
WTO Cell, Ministry of Commerce

BBIN REGIONAL TRANSPORT AND TRADE FACILITATION PROGRAM
BANGLADESH PHASE 1- PART OF A MULTIPHASE PROGRAMMATIC APPROACH (P176549)

Draft

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

March 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The People's Republic of Bangladesh (the Borrower) will implement the BBIN Regional Transport and Trade Facilitation Program - Bangladesh Phase 1 Project (the Project), with the involvement of the Bangladesh Land Port Authority (BLPA) under the Ministry of Shipping, Roads and Highways Department (RHD) under Ministry of Road Transports and Bridges, National Board of Revenue (NBR) under Ministry of Finance, and Ministry of Commerce – WTO Cell (MoC), as set out in the Financing Agreement. The International Development Association (World Bank) has agreed to provide financing (P176549) for the Project, as set out in the referred agreement. This ESCP shall apply to the Project referred to above.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP) in a manner acceptable to the World Bank. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the Borrower, this ESCP will be revised from time to time, if necessary, during Project implementation to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Borrower. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Each PIU will prepare and submit to the World Bank regular monitoring reports on the environmental, social, health, and safety (ESHS) performance on the respective activities of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.</p> <p>Procurement of Third party/ Independent monitoring firm or NGO will be completed for the monitoring of RAP implementation</p>	<p>Quarterly reports throughout the Project implementation.</p> <p>IAs would recruit the firm immediately after the mobilization of the RAP Implementation NGO/Firm (INGO).</p>	<p>PIUs (BLPA, MOC, NBR, RHD)</p> <p>PIUs (BLPA and RHD)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Each PIU will promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public, or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, concerns of COVID-19 infections, serious mismanagement in handling waste, security breach, etc. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the World Bank no later than 48 hours after learning about the incident or accident.</p> <p>Provide a subsequent report to the World Bank not later than 30 days when the Bank was notified of the incident.</p>	<p>PIUs (BLPA, MOC, NBR, RHD)</p>
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the World Bank.</p>	<p>Monthly. The first report will be submitted 30 calendar days after the Contractor's mobilization at the site.</p>	<p>Contractors employed by the PIUs (RHD, BLPA, NBR, and MOC)</p>
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p>		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>The World Bank will be notified of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation, and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the World Bank of (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>	<p>No later than 07 calendar days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, a notice of commencement of emergency / full arbitration, emergency/full arbitration order, as applicable).</p>	<p>PIUs (BLPA, MOC, NBR, RHD)</p>
<p>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</p>		
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>1. The Borrower, in collaboration with the IAs (BLPA, RHD, NBR, and MOC), will establish an inter-ministerial project steering committee (IPSC) for overall coordination, technical backstopping, and liaison, including for ESF implementation among the PIUs, respective ministries, and other relevant government ministries/agencies.</p> <p>2. An Environmental and Social Cell (ESC) as proposed in the ESMF with qualified staff and resources to support management of E&S risks and impacts associated with the Project Activities.</p> <p>3. PIUs will also engage E&S Consultants or through project management consultants (PMC), as relevant, as per the ESMF.</p>	<p>(1) IPSC: within 3 months of project effectiveness</p> <p>(2) The ESCs to be set up within 3 months of project effectiveness.</p> <p>(3) The E&S staff as included in the ESMF to be recruited within 3 months of project effectiveness and to remain with the Project throughout the project implementation: MOC: 2 specialists: (Gender and Social Development Specialist), Environmental Specialist); NBR: 2 specialists (Environmental/ OHS Expert, Social Development, Gender, and SEA/SH Expert); BLPA: 5 specialists (OHS & Labor Management Expert, Land Acquisition & Resettlement Expert, Environmental Expert, Gender and SEA/SH Expert, Social Development & Stakeholder Engagement Expert); RHD:</p>	<p>(1) PIUs (BLPA, MOC, NBR, and RHD)</p> <p>(2) PIUs (BLPA, MOC, NBR, and RHD)</p> <p>(3) PIUs (BLPA, MOC, NBR, and RHD)</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>4. The ESC will be staffed with Executive Engineer level core staff looking at the E&S management and liaise/coordinate with other PIUs. Individual consultants, including Land Acquisition and Resettlement Consultants (LAR Consultant) will also be engaged with ESC as proposed in the ESMF, RPF, and SEP.</p>	<p>5 specialists (OHS & Labor Management Expert, Land Acquisition & Resettlement Expert, Environmental Expert, Gender and SEA/SH Expert, Social Development & Stakeholder Engagement Expert) and 4 deputed engineers.</p> <p>(4) To be designated and deputed within 3 months of project effectiveness</p>	<p>(4) RHD and BLPA in their respective PIUs. NBR through the PMC.</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. adopt and implement Environmental and Social Impact Assessment (ESIA) documents, consistent with the relevant ESSs: (a) RHD for Sylhet-Charkhai-Sheola-Sutarkandi Road and (b) BLPA for Burimari Land Port</p> <p>2. Adopt and implement the E&S Management Framework (ESMF), consistent with the relevant ESSs.</p> <p>3. Adopt, and implement site specific ESIA reports, E&S Management Plan (ESMP), and/or any other E&S plans required in accordance with the ESMF, for the proposed sub-projects: (a) BLPA for Bhomra and Burimari land ports; (b) NBR for customs house and VAT Training academy in Chattogram.</p>	<p>(1) Adopted prior to appraisal and implement throughout Project implementation.</p> <p>(2) Adopt prior to appraisal and implement the ESMF throughout Project implementation.</p> <p>(3) Carry out subproject specific ESIA/ESMP following the ESMF and obtain the World Bank's approval prior to the respective bid process. Once adopted, implement the respective ESMP throughout sub-project implementation.</p>	<p>(1) RHD and BLPA</p> <p>2.PIUs (BLPA, MOC, and NBR)</p> <p>(3.a) BLPA for Bhomra and Benapole land ports. (3.b) NBR for the customs house and VAT Training academy in Chattogram.</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and Code of Conduct, C-ESMP and other sub-management plans (identified in ESIA) into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	<p>PIUs (BLPA, MOC, NBR, RHD)</p>
<p>1.4 TECHNICAL ASSISTANCE</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Ensure that the consultancies, studies (including feasibility studies, as applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the World Bank that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation.	PIUs (BLPA, MOC, NBR, RHD)
1.5	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements, including ESMF Addendum for the implementation of CERC in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&S) instruments which may be required for activities under CERC of the Project, in accordance with the CERC Manual and CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The adoption of the CERC manual in form and substance acceptable to the World Bank and respective IAs is a withdrawal condition under section 1B of Schedule 2 of the Financing Agreement for the Project.</p> <p>b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before carrying out the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms throughout Project implementation.</p>	PIUs (BLPA, MOC, NBR, RHD)
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement consolidated Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers' relationships, occupational health and safety (including personal protective equipment [PPE], and emergency preparedness and response), Code of Conduct (including relating to GBV/SEA/SH), forced labor, child labor, grievance redress arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Prior to appraisal	PIUs (BLPA, MOC, NBR, RHD)
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p>	All 4 (four) IAs to set up labor-specific GRMs (per outline in the LMP) within the	PIUs (BLPA, MOC, NBR, RHD)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Establish and operate a grievance redress mechanism (GRM) for Project workers, as described in the LMPs and consistent with ESS2. The GRM should also be designed to address labor-related GBV/SEA/SH issues including provision of a referral system.	first (1 st) quarter and, after that, maintain and operate respective GRMs throughout Project implementation.	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes and e-Waste consistent with ESS3. The specific WMP will be integrated in the site specific ESMP with other sub-management plans.	Adopted within the first (1 st) quarter from the Effective Date of the Project and maintained throughout Project implementation.	PIUs (BLPA, MOC, NBR, RHD)
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the site specific ESMP to be prepared under the project.	Adopted within the first (1 st) quarter from the Effective Date of the Project and maintained throughout Project implementation.	PIUs (BLPA, MOC, NBR, RHD)
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Consultants (i.e., Environmental Specialists in the PIUs) to prepare traffic and road safety management plans as part of ESMP. Incorporate measures to manage traffic and road safety risks as required in the ESMP in bidding documents. Before the implementation of the specific sub-project, the Contractor to make these plans site specific. These are then reviewed by PIU consultants and their effectiveness monitored during physical construction works.	Prepare plans as part of ESIA's and ESMPs. Monitor implementation throughout the Project timeline.	PIUs (BLPA, NBR, RHD)
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, e.g., behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Done as part of ESIA/ESMP and implemented throughout the Project timeline.	PIUs (BLPA, NBR, RHD)
4.3	SEA AND SH RISKS Adopt and implement a SEA/SH Action Plan to assess and manage the risks of SEA/SH.	Prior to project effectiveness and after that, implement it throughout the Project timeline.	PIUs (BLPA, MOC, NBR, RHD)
4.4	SECURITY MANAGEMENT Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the ESMP and guided by the principles of proportionality and GIIP,	Implement it throughout the Project timeline within 6 (six) months of the Project's effectiveness.	PIUs (BLPA, NBR, RHD)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	Prior to appraisal and implemented throughout Project implementation	PIUs (BLPA, RHD, NBR)
5.2	RESETTLEMENT PLANS Adopt and implement site-specific resettlement action plans (RAPs) as set out in the RPF and consistent with ESS5. Set up Monitoring Committees as detailed in the RPF: (a) PIU level and (b) Field-level to guide and support RAP implementation, especially for the disbursement of fund provided in the RAP, payment of compensation to the PAPs, and liaise with various stakeholders including different governmental organizations and other relevant agencies.	To be prepared prior to the issue of bids for the corresponding civil works contracts Prior to the start of the land acquisition process	PIUs (BLPA, RHD)
5.3	GRIEVANCE MECHANISM Adopt and implement respective GMs/ GRMs as referred in the RPF RAP, consistent with ESS5 and ESS 10.	Immediately after the preparation of the site-specific RAPs and prior to the start of land acquisition.	PIU (BLPA and RHD)
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Adopt and implement a Biodiversity Management Plan (BMP) as/ if identified in the ESMF and incorporate in the site specific ESMP as will be prepared.	Adopted within the first (1 st) quarter from the Effective Date of the Project and maintained throughout Project implementation.	PIU (BLPA, RHD, NBR)
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS	Adopted within the first (1 st) quarter from the Effective Date of the Project	PIUs (BLPA, RHD, NBR)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement a Cultural Heritage Management Plan (CHMP) as/ if identified in the site-specific ESIA/ESMP prepared for the Project and consistent with ESS8.	and maintained throughout Project implementation.	
8.2	CHANCE FINDS Describe and implement the chance finds procedures as part of the ESMF, ESIA, ESMP of the Project.	Throughout Project implementation but specifically during the preparation of the ESIA/ESMP.	PIUs (BLPA, RHD, NBR)
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.	Prior to appraisal	PIUs (BLPA, RHD, MOC, NBR)
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	All 4 (four) IAs to set up project-specific GRMs (per outline in the SEP) within 30 (thirty) calendar days of project approval. In the interim, make the existing institutional GRMs of the IAs accessible to the stakeholders.	PIUs (BLPA, RHD, MOC, NBR)
CAPACITY SUPPORT			
CS1	Based on E&S Capacity Assessment, following types of training will be provided to the relevant target groups, such as PIU staff, key stakeholders, direct workers, and consultants: <ul style="list-style-type: none"> • Introduction to World Bank ESF • Labor and working conditions, OHS, and Labor management audit • Stakeholder Engagement 	During project implementation	*PIUs (RHD, MOC, BLPA, NBR) *PIU Environmental and Social Development

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> • Grievance Management • Environmental and social assessment and social inclusion • Preparation of ESIA and ESMP • Preparation and review of RPF and RAP • ESF/ESS compliance monitoring and audit • RAP compliance monitoring and audit • Gender and development • Community Health and Safety • SEA/SH Risk Management • Chance finds procedure (and if necessary, Cultural heritage impacts management) 		Specialists *World Bank
CS2	Training for contractors, sub-contractors, contracted workers, community, project affected persons, etc. <ul style="list-style-type: none"> • Occupational and community health and safety • SEA/SH and Code of conduct • Grievance management, including labor and SEA/SH GRM • Compensation payment and land ownership/entitlements • Gender and development • Community Health and Safety • SEA/SH Risk Management 	During project implementation	*PIUs (RHD, MOC, BLPA, NBR) *PIU Environmental and Social Development Specialists *Contractor