

Bangladesh Hi-Tech Park Authority (BHTPA)

**BANGLADESH PRIVATE INVESTMENT & DIGITAL
ENTREPRENEURSHIP PROJECT (PRIDE)**

P170688

(Draft)

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

16February 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The Government of Bangladesh (**GoB**) will implement the Private Investment and Digital Entrepreneur Project (**PRIDE**) (the **Project**), with the involvement of the Bangladesh Economic Zones Authority (**BEZA**) (*Component 1-3*) and Bangladesh Hi-Tech Park Authority (**BHTPA**) (*Component 4*). The International Development Association (hereinafter the **Bank**) has agreed to provide financing for the Project.
2. The **GoB** will implement material measures and actions so that the Project (*Component 4*) is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The **GoB** will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans/Framework (**ESMP/ESMF**), Labor Management procedures (**LMP**) and Stakeholder Engagement Plans (**SEP**), and the timelines specified in those E&S documents.
4. The **GoB** is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Implementing Agency (**IA**) (**BHTPA**) referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the **Bank** by the **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.
6. As agreed by the **Bank** and the **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, the **GoB** will agree to the changes with the **Bank** and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the **Bank** and the **GoB**. The **GoB** will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the **GoB** shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, social, safety impacts, labor influx, gender-based violence etc.

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
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| MONITORING AND REPORTING | | | |
| A | <p>REGULAR REPORTING</p> <p>BHTPA (Implementing Agency, IA) will prepare and submit to the Bank, regular monitoring reports on environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p> | <p>Half yearly(by January 15 and July 15, every year),reporting throughout the Project implementation</p> | <p>BHTPA – the Implementing Agency (IA). Budget for mitigation measures, monitoring and reporting is USD 19,120.00</p> |
| B | <p>INCIDENTS AND ACCIDENTS</p> <p>The IA will promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment during constructions of extension of Janata Tower, health of the adjacent communities, cases of GBV/SEA, mismanagement in handling waste, security breach, death/disability or any incident or accident from the construction activities as would be executed by the Contractor etc. The IA will provide sufficient information regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p> | <p>Notify the Bank within 24 hours of occurrence of such accidents or incidents. A report on action taken to be provided on the same to the Bank within 07 (Seven) days of notification.</p> | <p>IA</p> |
| C | <p>CONTRACTORS MONTHLY REPORTS</p> <p>IA will ensure that the Contractor provides reports on (i) employment numbers including new recruits and those who left (ii) cases of GBV reports (iii) cases of OHS related incidents (iv) reports received through GRM system (v) issues related to traffic incidents, noise and air pollution, communicable diseases (vi) safety and security breach (vii) training provided to workers</p> | <p>Monthly (by 10th of every following month)</p> | <p>IA</p> |

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

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| <p>1.1</p> | <p>ORGANIZATIONAL STRUCTURE</p> <p>The IA will recruit an Environmental Specialist (ES) – responsible for addressing environmental risks/impacts, addressing health and safety issues as well as waste management issues and a Social Specialist (SS) – responsible for addressing risks associated with social issues (Labor, GBV, OHS) with qualifications, experience and under terms of reference satisfactory to the Bank.</p> | <p>Recruitment process of these specialists (ES, SDS) will start within 30 days of Project effectiveness.</p> | <p>IA</p> <p>The man-month of the experts will be 12 months for each and estimated remuneration of the experts are calculated as USD 85,000.00</p> |
| <p>1.2</p> | <p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>IA would update the ESIA of the expansion of Janata Tower once detail design is available and implement the updated ESMP.</p> <p>IA will follow the procedure set out in the ESMF to ensure environmental and social compliance of components for which detail information and or location is not known during project preparation stage.</p> | <p>Update of the ESIA of Janata Tower would be done within one month of the detailed design availability.</p> <p>Measures of ESMF needs to be followed prior to project implementation.</p> <p>The IA will implement the mitigation measures contained in the ESMF and ESMP throughout the Project implementation.</p> | <p>IA</p> |
| <p>1.3</p> | <p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>The IA will adopt and implement project specific Environmental and Social Management Plan (ESMP) including Labor Management Procedure (LMP), Stakeholder Engagement Plan (SEP), GBV risk assessment and action plan that have been or will be prepared. If land acquisition is required for IMD, RAP will be prepared following the guidelines in RPF. Since no small ethnic minority communities have been found, no Small Ethnic Community Development Plan (SECDP) is required.</p> | <p>The instruments will be implemented throughout the project.</p> | <p>IA</p> |

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| 1.4 | <p>MANAGEMENT OF CONTRACTORS</p> <p>The IA will ensure inclusion of all relevant conditions and Environmental, Social, Health and Safety (ESHS) specifications in the bidding documents. IA will thereafter, ensure that the contractors comply with the ESHS specifications of their respective contracts. The contractors will also need to have their own Labor Management Plan and C-ESMP.</p> | <p>Prior to the preparation of bid documents. The IA will supervise contractors throughout Project implementation</p> | IA |
| ESS 2: LABOR AND WORKING CONDITIONS | | | |
| 2.1 | <p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.</p> | <p>The LMP will be administered and implemented throughout project implementation period.</p> | IA |
| 2.2 | <p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Two GRMs have already been prepared under SEP (Project level GRM including GBV) and LMP (labor related). The IA will maintain and operate the GRMs for Project affected parties, interested parties and workers, as described in the SEP and LMP.</p> | <p>GRM will be operational prior to project effectiveness and maintained throughout the Project period.</p> | IA |
| 2.3 | <p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>The IA has prepared OHS measures under ESMP of Janata Tower expansion and will adopt and implement them as is specified in the ESMP. The ESMF for other activities also include framework for preparing and implementing OHS measures.</p> | <p>Will be implemented throughout the Project period</p> | IA |
| ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT | | | |

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| 3.1 | <p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>The IA would ensure implementation of ESMP for pollution prevention and would take initiative to reduce, reuse or recycle waste material to the extent possible. If this is not technically / financially feasible, waste would be treated, destroyed or disposed off in an environmentally safe manner as mentioned in the ESMP.</p> | Will be implemented throughout the Project period | IA |
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ESS 4: COMMUNITY HEALTH AND SAFETY

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| 4.1 | <p>TRAFFIC AND ROAD SAFETY:</p> <p>The construction of Janata Tower will create traffic disruption in the heavy-traffic area of the city center. The IA will ensure the preparation of a Traffic Management Plan by the contractors and adopted to assess and manage traffic and road safety risks as required in the ESMP.</p> | The Plan will be developed as soon as the contract is awarded and will be maintained throughout the project. | Contractor |
| 4.2 | <p>COMMUNITY HEALTH AND SAFETY:</p> <p>The IA has prepared an ESMP that includes measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, response to emergency situations, community health & safety, handling of hazardous material and wastes etc. These will be adopted and implemented in a manner acceptable to the Bank.</p> | Will be implemented throughout the Project period | IA |
| 4.3 | <p>GBV AND SEA RISKS:</p> <p>The IA has already prepared and will adopt and implement a Project Grievance Redress Mechanism (GRM) under SEP as well as a labor related GRM under LMP. Project GRM will also manage the risks of GBV and Sexual Exploitation and Abuse (SEA).</p> | Project GRM will be established and will cover GBV related incidents. The GRM will be operational before project implementation. The Stakeholders including the communities will be notified about the GRM within a month of project effectiveness. | IA |

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| 4.4 | <p>SECURITY PERSONNEL:</p> <p>In case security personnel are deployed, the IA will prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank</p> | <p>Prior to engaging security personnel and thereafter implemented throughout the Project</p> | IA |
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ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

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| 5.1 | <p>RESETTLEMENT PLANS:</p> <p>The project will not require any land acquisition. Further, during ESIA preparation no squatters were found to be located in the project area. According to the ESIA, the need for the preparation of a resettlement instrument such as RAP is not envisaged.</p> | <p>No resettlement instruments are required to be prepared since the Project will not require land acquisition and no squatters were found to be adversely affected by the Project activities.</p> | IA |
| 5.2 | <p>GRIEVANCE MECHANISM</p> <p>No land acquisition and resettlement will be required for the Project.</p> | <p>Not relevant</p> | |

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

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| 6.1 | <p>BIODIVERSITY RISKS AND IMPACTS</p> <p>The project activities are unlikely to affect any biodiversity</p> | <p>Not relevant</p> | |
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ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES

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| 7.1 | <p>INDIGENOUS PEOPLES PLAN</p> <p>No ethnic communities have been located in the project area thus no SECDP is required to be prepared.</p> | <p>Not relevant</p> | |
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ESS 8: CULTURAL HERITAGE

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| 8.1 | <p>CHANCE FINDS:</p> <p>No cultural heritage site is located in the project area. A chance finds procedure will be included in works contracts requiring contractors to stop construction if cultural heritage is encountered during any work and to notify and closely coordinate with relevant mandated country authority for the salvaging and restoration of such cultural heritage.</p> | During preparation of bid document | IA |
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ESS 9: FINANCIAL INTERMEDIARIES

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| 9.1 | No FI is involved in the Project | NA | |
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ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

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| 10.1 | <p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>The IA has prepared an SEP. It will be adopted, updated from time to time as needed, and implemented.</p> | <p>The PMU will implement the SEP as planned. In the process of implementation if newer stakeholders, risk/ impacts are identified these will be addressed with relevant stakeholders and remedial measures implemented after necessary consultation. These will be updated and will be disclosed through the IA website. The PMU will monitor the implementation of SEP and report it to the PSC, Bank and the stakeholders as per timeline given in the SEP.</p> | IA |
| 10.2 | <p>PROJECT GRIEVANCE MECHANISM:</p> <p>The IA has already prepared a Project GRM under SEP and will adopt, maintain and operate the same.</p> | <p>The GRM will be operational before project implementation. The Stakeholders including the communities will be notified about the GRM within a month of project effectiveness.</p> | IA |

| CAPACITY SUPPORT (TRAINING) | | | |
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| Ser | Specify Training to be provided | Targeted Groups and Timeframe | Training Completed |
| <p>A Social, Environmental and Communication cell is therefore recommended under the PD (BHTPA). This cell will work independently to monitor and supervise the ESMP for the project. The PMC will work under the PMU. The PMC will need to have qualified Environmental and Social Specialists who will review the reports from the Design and Supervision Consultants and the Contractors on the implementation of the ESMP. The Design and Supervision Consultant will work in the STP-2 to monitor the implementation of the ESMP by the contractor and report to the PMU. During the project period, the Environmental and Social Consultants will have to be deployed under PMU level. After ending the project fund, the positions will have to be in permanent status under BHTPA. Training shall be imparted, on a regular interval, to the BHTPA officials and Staff on environmental and social issues. The ESMP will be used as a training material for capacity building of BHTPA officials/ staff and the Environmental & Social Specialist will act as facilitators for the capacity building sessions. The trainings will cost USD 12,500.00 in total.</p> | | | |
| 1 | <p>ESF. Training on ESF and the 10 ESSs—including preparation of ESMP</p> | <p>Personnel directly related with project at BHTPA (PMU officials)</p> | <p>Prior to Project effectiveness. This training will be implemented during the project commencement period. Total budget for this training is USD 1,200.00</p> |
| 2 | <p>Occupational Health and Safety (OHS) Module:</p> <ul style="list-style-type: none"> • ESMP implementation • Personal protection equipment (PPE) • Workplace risk management • Prevention of accidents at work sites • Health and safety rules • Waste management • Preparedness and response to emergency situations | <p>PMU Officials and Civil Work Contractors</p> | <p>Early stage of Project implementation and continue half yearly throughout the project. There will be four training over construction period, and the total budget is USD 2,400.00.</p> |
| 3 | <p>Labor and Working Conditions</p> <ul style="list-style-type: none"> • Terms and conditions of employment according to national working laws and regulations • Contractor Codes of Conduct (CoC) with emphasis on GBV issues • Child labor and minimum age employment rules | <p>PMU officials, Contractor’s Health Safety in Charge, Labor Sardars (Leaders)</p> | <p>Early stage of Project implementation once a year. As there will be two trainings so total budget is USD 1,200.00</p> |

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| 4 | <p>Grievance Redress Mechanism (GRM) Module, design and conduct training module addressing the following aspects:</p> <ul style="list-style-type: none"> • Registration and processing procedure • Grievance redress procedure • Documenting and processing grievance • Use of the procedure by different stakeholders | PMU Officials, ES, SDS, Contractor | Early stage of Project implementation and thereafter once every six months. There will be four trainings and the total budget is USD 1,400.00 |
| 5 | <p>Construction Waste Management:</p> <p>Information about the risks, along with health and safety advice, see the World Bank Group Environmental Health and Safety Guidelines on managing construction waste and the relevant international good practices</p> <p>Basic knowledge about handling procedures and risk management</p> <p>Using protective and safety equipment</p> <p>Information about the waste sorting process</p> <p>Safe procedures for managing waste in dumps</p> <p>Hazardous waste management</p> <p>Refuelling procedure</p> <p>Spillage of soil management</p> | ES, EHS, SDS, Contractors | <p>Within three months of Project effectiveness and thereafter every three months</p> <p>Each session for 1 day. 8 training will be held and total budget is USD 2,800.00</p> |

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| 6 | <p>GBV Risk Module</p> <p>Raising awareness and measures to prevent and mitigate GBV risks</p> <p>The topics, activities and targeted groups will be developed in the GBV Action Plan including GBV-specific GRM</p> | <p>BHTPA Local officials, Contractors Health Safety Officer, Labour Sardars (Leaders), Local NGOs</p> | <p>Within three months of Project effectiveness and thereafter every six months</p> <p>Each session for 2 days. Four trainings will take place and total budget is USD 3,500.00</p> |
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