

# **Bangladesh High-Tech Park Authority (BHTPA)**

## **Environmental and Social Management Framework (ESMF) for BHTPA UNDER PRIDE Project**

**January 2020**

***Development Research Initiative (dRI)***

## EXECUTIVE SUMMARY

### Background

Information and Communication Technology (ICT) is playing an important role for achieving Bangladesh's mission of becoming a middle-income country by 2021. To accelerate the economic development of the country, Bangladesh Hi-Tech Park Authority (BHTPA) has been established in 2010. The Government of Bangladesh has declared "Vision 2021" with a target to make Bangladesh a middle-income country by using Information and Communication Technology (ICT) and by developing favorable business environment for Hi-Tech industries. Information Technology has been identified as the "thrust sector" for the economy of Bangladesh. Government has taken various initiatives to achieve the target.

The World Bank's Private Investment & Digital Entrepreneurship (PRIDE) project is aimed to promote private investment and job creation in economic zones and digital entrepreneurship in hi-tech parks. The project will spearhead the adoption and mainstreaming of green industrial park concepts in the implementation and development of economic zones in Bangladesh. The project has four components. The first three components will be implemented by BEZA and the fourth component will be implemented by BHTPA.

The fourth component will be implemented by BHTPA. It aims to strengthen the foundation of the digital entrepreneurship and innovation ecosystem in Bangladesh. It will create the country's largest agglomeration of IT and ITeS companies in Dhaka's Janata STP and promote digital entrepreneurship more broadly among young professionals and women. It will design and implement a program that supports digital entrepreneurship at three levels. First, it will establish modern and professional start-up and scale-up facilities and services in STPs licensed by BHTPA. Second, it will introduce entrepreneurship and innovation hubs in several of Bangladesh's leading technological universities and business schools. This will also offer accredited and rapid training programs to budding entrepreneurs and managers in the IT and ITeS field. Thirdly, it will offer a media-based challenge program with grant prizes to help change attitudes and attract more youth, women and young professionals to consider becoming entrepreneurs. The goals are: (a) for STPs and leading universities to evolve into entrepreneurship hubs, (b) to increase market entry and growth rates of digital startups and small and medium-sized enterprises, and (c) to create a gender-inclusive culture for digital entrepreneurship. The activities will be integrated through existing institutions such as universities and STPs to make the outcome as sustainable as possible.

Under the project, university Innovation Hubs and Incubation centres will be established in few universities at Khulna, Chattogram and Dhaka. Initially KUET and CUET has been selected at Khulna and Chattogram for the purpose. No university has yet been selected at Dhaka. The project would also support Start-up and Scale-up Facilities and Services in the existing Software Technology Parks (STPs).

### Project Description

The project would finance **Start-up and Scale-up Facilities and Services** to help creating a market for, and raise demand for, mentorship and advisory services that are tailored for entrepreneurs in the digital economy. The facilities and services will be offered to budding and existing entrepreneurs particularly in STPs. The services on offer will include incubation and acceleration support, market entry and market expansion advisory, and investment readiness support to help digital entrepreneurs access external sources of finance and equity funding. The services offered in the Chattogram, Janata and Jashore STPs will be provided by experienced professional operators and initially have a permanent establishment in Dhaka and Chattogram, while the roll-out in Jashore,

Kaliakoir and Rajshahi will be made gradually. Entrepreneurs located outside the STPs will be able to access programs to create linkages and network effects in addition to a prospective pipeline of new tenants. It will cover a dedicated program to support women-owned businesses and new entrepreneurs.

**University Innovation Hubs** in Chattagram, Dhaka and Khulna (and may be in some other cities) will be established to attract more students to become digital entrepreneurs within leading technological universities and business schools. Professional operators will be engaged to design, operate and then transfer the University Innovation Hubs to the universities in which they are embedded. The project will finance refurbishment/works of the innovation hub spaces in existing universities as well as goods and technical assistance to ensure that these new facilities can attract top talent and service providers. The UIHs will over time be expected to expand to add complementary innovation activities such as hardware prototyping spaces, joint research centers with industry, technology transfer offices, etc. This is in line with the University Grants Commission's (UGC) vision and objectives. The objective is to develop systematic programs that include investment into commercializing research and supporting innovative ideas so that UGC can demonstrate academia's role in the ecosystem. BHTPA will develop and mainstream incubation guidelines for university-based incubation centers which will follow global good practices and focus on outcomes and key principles that would allow flexibility to innovation, local customization and adjustments in order to develop suitable models for universities.

## Legal, Regulatory and Administrative Framework

This ESMF has been prepared in accordance with national and World Bank's Environmental and Social Framework (ESF) requirements.

The Bank classifies all projects into one of four categories: High Risk, Substantial Risk, Moderate Risk or Low Risk. In determining the appropriate risk classification, the Bank takes into account relevant issues, such as the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential environmental and social risks and impacts; and the capacity and commitment of the Borrower to manage the environmental and social risks and impacts in a manner consistent with the 10 (ten) Environmental and Social Standards (ESS). ESS 1, 2, 3 4,5, 6 and 10 are considered relevant to this project.

The World Bank's Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. Application of the EHS Guidelines to existing facilities may involve the establishment of site-specific targets, with an appropriate timetable for achieving them. The applicability of the EHS Guidelines should be tailored to the hazards and risks established for each project on the basis of the results of an environmental assessment in which site-specific variables, such as host country context, assimilative capacity of the environment, and other project factors, are taken into account.

The main relevant national level laws, policies, plans and regulations include:

- Constitution of Bangladesh
- Bangladesh Environment Conservation Act, 1995
- Environment Conservation Rules, 1997
- Bangladesh Climate Change Strategy and Action Plan (BCCSAP)'09
- National Environmental Policy, 1992

- National Water Policy, 1999
- Standing Orders on Disaster, 2010
- National Fisheries Policy, 1999
- National Strategy for Waste Management
- The Groundwater Management Ordinance, 1985 (Ordinance No. xxvii of 1985)
- The Protection and Conservation of Fish Act, 1950
- National Land Use Policy, 2001
- Bangladesh Labour Act, 2006
- The Penal Code, 1860
- Wildlife Conservation (Protection and Safety) Act, 2012
- The Forest Act, 1927 and the Forest (Amendment) Act, 2000
- Bangladesh National Building Code (BNBC), 2015 (final draft)
- Industrial Policy, 1999
- National Agriculture Policy, 2013
- Bangladesh Country Investment Plan (CIP), 2011
- The Acquisition and Requisition of Immovable Property Act (ARIPA), 2017

## Environmental and Social Baseline

The activities under this component would be confined within a few universities at Khulna, Chattagram and Dhaka and within the existing STPs at Jashore, Chattogram, Gazipour and Dhaka. The activities within the STPs would be mostly soft in nature and would include minor civil works. An overview of the existing baseline information of Khulna, Chattagram and Dhaka where University Innovation Hubs are going to be established has been presented in the ESMF based on primary and secondary data. Detailed baseline environment of the Project area (covering biophysical and socioeconomic environment) will be collected and presented in the sub-project ESIA.

## Identification of Potential Environmental and Social Impacts and Mitigation Measures

The environmental and social impact assessment concluded that the project activities would not have any significant environmental and social impact. It is most likely that there would not be construction of any new building under this component and would include small scale civil work within the existing infrastructure. The University Innovation Hubs and incubation centers will be set up in the existing buildings of the selected universities. However, this Environmental and Social Management Framework (ESMF) will ensure that all the project activities are screened out, and those activities are supported where the potential environmental and social risks and impacts are predictable, not significant in magnitude and site specific with low probability of serious adverse effects to human health and/or environment. The ESMF suggests a broad range of mitigation and enhancement measures to reduce negative impacts and enhance benefits. Mitigation measures need to be identified and designed to avoid or eliminate or offset adverse environmental impacts, or reduce them to acceptable levels during both construction and operation phases of a sub-project intervention. Example mitigation measures for environmental and social issues for each sub-project are provided in **Annex D**.

## Methodological Framework for Environmental and Social Management

It is anticipated that proposed activities under BHTPA interventions may have some environmental and social impacts. However, the extent and scale of the impacts would vary depending on the specific location and detailed design. The environmental and social assessment of PRIDE sub-projects

will need to be carried out based on the provisions of the Environment Conservation Rules 1997 and the relevant World Bank's ten (10) Environmental and Social Standards (ESSs).

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 would have little environmental and social impact. Based on the outcome of screening, preparation of appropriate safeguards documents such as IEE/ESA, ESIA, RAP and ESMP would be prepared. The recommendations from these safeguards documents will need to be incorporated by the detailed design team and also incorporated into the tender (bidding) documents. After selection of the contractor(s), site preparation activities will commence and at the same time ESMP implementation will begin. This will involve carrying out the proposed mitigation measures, monitoring and reporting activities for the sub-project.

The formal environmental and social assessment starts with the Environmental and Social Screening of proposed interventions (**Annex A& Annex B**). The purpose of the environmental screening is to get relevant concerns addressed in the design phase of the project. 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 BHTPA 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.

The outcome of the screening process is to categorize the sub-project in terms of its environmental and social risks. Considering potential environmental impacts and their significance, PRIDE sub-projects will be categorized as: High, Substantial, Moderate or Low based on ESF of WB and ECR 1997 of GoB.

For High and Substantial Risk Category sub-projects, detailed ESIA will be required. These should include site-specific information (e.g. environmentally sensitive areas, or need to better define and understand potential issues, brief description of impacts specifying well defined mitigating measures and adopting accepted operating practices and monitoring).

Moderate Risk Category sub-projects will require an IEE/ESA. The IEE/ESA is a review of the reasonably foreseeable effects of a proposed development intervention/activity on the environment. Participation and consultation with local communities are important in identifying the potential impacts and suitable mitigation measures.

For Low Risk Category sub-projects, a site-specific ESMP will be required to ensure enhancements such as greening measures are implemented. The ESMP should clearly lay out: (a) the measures to be taken during both construction and operation phases of a sub-project to eliminate or offset adverse environmental and social impacts, or reduce them to acceptable levels; (b) the actions needed to implement these measures; and (c) a monitoring plan to assess the effectiveness of the mitigation measures employed. Example ESMP and Monitoring Plan are provided in **Annex D**.

## **Stakeholder Engagement, Grievance Mechanism and Disclosure**

For the PRIDE project, BHTPA has already designed a stakeholder engagement plan (SEP) for all of the activities. As a part of preparing this ESMF, stakeholders consultation, focus group discussions (FGDs) and key informant interviews (KIIs) were carried out in some of the areas.

During preparation of the ESMF under the present study, all the stakeholders have been primarily synthesised into two categories that have been identified as:

- Project-affected parties: those who are or likely to be affected by the project, and

- Other interested parties: who may have an interest in the project and who could influence the opinions of affected parties either positively or negatively, or affect the implementation process or the sustainability of the project's outcomes

However, an ESA has been prepared for the construction of a 12-storied building for expansion of existing Janata Tower STP and a GRM has been proposed in that document which would be applied to this component also.

### **Institutional Framework**

The key institutions relevant for ESMF implementation include: BHTPA, Department of ICT (DICT) and Dept. of Environment (DoE). PMU/PMC has the most important role for ESMF implementation and updating.

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## ACRONYMS AND ABBREVIATIONS

AIDS	Acquired Immunodeficiency Syndrome
AP	Affected People
ARP	Abbreviated Resettlement Plan
As	Arsenic
BBS	Bangladesh Bureau of Statistics
BDT	Bangladesh Taka
BEPZA	Bangladesh Export Processing Zone Authority
BEZA	Bangladesh Economic Zones Authority
BHTPA	Bangladesh Hi-Tech Park Authority
BNBC	Bangladesh National Building Code
BOD <sub>5</sub>	Bio-chemical Oxygen Demand at 5 Days
BSMSN	Bangabandhu Sheikh Mujib Shilpa Nagar
BTCL	Bangladesh Telecommunications Company Limited
BWDB	Bangladesh Water Development
CDA	Cox's Bazar Development Authority
CDSP	Char Development and Settlement Project
CETP	Common Effluent Treatment Plant
Cl <sup>-</sup>	Chloride Ion
CO	Carbon Mono-oxide
COD	Chemical Oxygen Demand
CPA	Chittagong Port Authority
CRO	Chief Resettlement Officer
DC	District Commissioner
DEM	Digital Elevation Model
DLI	Disbursement Linked Indicators
DMP	Disaster Management Plan
DO	Dissolved Oxygen
DoE	Department of Environment
DoF	Department of Fisheries
DP	Development Partner
DPD	Deputy Project Director
DPHE	Department of Public Health & Engineering
DTW	Deep Tube-well
E&S	Environmental and Social
EA	Environmental Assessment
EBRD	European Bank for Reconstruction and Development
ECA	Ecologically Critical Area
ECC	Environmental Clearance Certificate
ECR	Environment Conservation Rules
EHS	Environmental Health and Safety
EIA	Environmental Impact Assessment
EMAP	Environment Management Action Plan
EMF	Environmental Management Framework
EMP	Environmental Management Plan
EQS	Environmental Quality Standards
ES	Environmental Standard

ES	EnvironmentalSpecialist
ESA	EnvironmentalandSocialAssessment
ESC	EnvironmentalandSocialCell
ESCP	EnvironmentandSocialCommitmentPlan
ESF	EnvironmentalandSocialFramework
ESIA	EnvironmentalandSocialImpactAssessment
ESMF	EnvironmentalandSocialManagementFramework
ESMoP	EnvironmentalandSocialMonitoringPlan
ESMP	EnvironmentalandSocialManagementPlan
ESS	EnvironmentandSocialStandards
ETP	EffluentTreatmentPlant
EZ	EconomicZone
FC	FaecalColiform
FGD	FocusGroupDiscussions
FPIC	Free,PriorandInformedConsent
GAP	GenderActionPlan
GBV	GenderBasedViolence
GDP	GrossDomesticProduct
GHG	GreenhouseGases
GIIP	GoodInternationalIndustryPractice
GMD	Green Zone Master Developer
GO	GovernmentOrganizations
GOB	GovernmentofBangladesh
GPP	GuidelinesforPeople'sParticipation
GRC	GrievanceRedressCommittee
GRM	GrievanceRedressMechanism
HH	Household
HIV	HumanImmunodeficiencyVirus
HYVBoro	HighYieldingVarietyofBoro
IA	ImplementingAgency
IEE	InitialEnvironmentalExamination
IFC	InternationalFinanceCorporation
INGO	ImplementingNon-Governmentorganization
IP	IndigenousPeople
IPF	InvestmentProjectFinancing
IPP	IndigenousPeoplePlan
IWM	InstituteofWaterModelling
JV	JointVenture
KGDCL	KarnaphuliGasDistributionCompanyLtd
KII	KeyInformantInterviews
LA	LandAcquisition
LAP	LandAcquisitionPlan
$L_{eq}$	EquivalentLevel
LG	LocalGovernance
LGED	LocalGovernmentEngineeringDepartment
LGI	LocalGovernmentInstitute
LMP	LabourManagementProcedures
LNG	LiquefiedNaturalGas

LRSP	LivelihoodRestorationSupportPlan
MLD	MillionLitreperDay
MOEFCC	MinistryofEnvironment,ForestandClimateChange
MoWR	MinistryofWaterResources
MT	MetricTon
NBC	NationalBuildingCode
NBSAP	NationalBiodiversityStrategy&ActionPlan
NEMAP	NationalEnvironmentalManagementActionPlan
NEP	NationalEnergyPolicy
NEQS	NationalEnvironmentalQualityStandards
NGO	Non-GovernmentOrganizations
NH <sub>3</sub>	Ammonia
NLTP	NationalLandTransportPolicy
NLUP	NationalLandUsePolicy
NOx	NitrogenOxides
NWMP	NationalWaterManagementPlan
O&M	OperationandMaintenance
OHS	OccupationalHealthSafety
OSS	OneStopShop
PAH	ProjectAffectedHouseholds
PAP	ProjectAffectedPeople
Pb	Lead
PCU	PassengerCarUnit
PD	ProjectDirector
PDO	ProjectDevelopmentObjective
PEZ	PrivateEconomicZone
PGCB	PowerGridCompanyofBangladesh
PIU	ProjectImplementationUnit
PL	PostLarvae
PM <sub>10</sub>	ParticulateMatter10 micron size
PM <sub>2.5</sub>	ParticulateMatter2.5 micron size
PMC	ProjectManagementConsultant
PMO	PrimeMinister'sOffice
PMU	ProjectManagementUnit
PPE	PersonalProtectiveEquipment
PPP	PublicPrivatePartnership
PPSEZ	PhnomPenhSpecialEconomicZone
PRIDE	PrivateInvestment&DigitalEntrepreneurship
PSDSP	PrivateSectorDevelopmentSupportProject
PUC	PollutionUnderControl
PWD	PublicWorksDepartment
QA	QualityAssurance
QC	QualityControl
RAP	ResettlementActionPlan
RHD	RoadsandHighwaysDepartment
RP	ResettlementPlan
RPF	ResettlementPolicyFramework
RSMF	ResettlementandSocialManagementFramework

SEC	Social and Environmental Cell
SEP	StakeholderEngagementPlan
SHE	Safety,HealthandEnvironmental
SIA	SocialImpactAssessment
SO <sub>2</sub>	SulphurDioxide
SOB	SurveyofBangladesh
SPM	SuspendedParticulateMatter
SRDI	SoilResourceDevelopmentinstitute
SS	SocialSpecialist
STP	SewageTreatmentPlant
SWTP	StormWaterTreatmentPlant
TC	TotalColiform
TDS	TotalDissolvedSolids
ToR	TermsofReference
TOT	TrainingoftheTrainers
TPI	ThirdPartyInspection
TPP	TribalPeoplesPlan
TSS	TotalSuspendedSolids
UNO	UpazillaNirbahiOfficer
WARPO	WaterResourcesPlanningOrganization
WB	TheWorldBank
WTP	WaterTreatmentPlant

## CHAPTER 1. INTRODUCTION

### 1.1 Background

Information and Communication Technology (ICT) is playing an important role for achieving Bangladesh's mission of becoming a middle-income country by 2021. To accelerate the economic development of the country, Bangladesh Hi-Tech Park Authority (BHTPA) has been established in 2010. The Government of Bangladesh has declared "Vision 2021" with a target to make Bangladesh a middle-income country by using Information and Communication Technology (ICT) and by developing favorable business environment for Hi-Tech industries. Information Technology has been identified as the "thrust sector" for the economy of Bangladesh. Government has taken various initiatives to achieve the target.

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Under the project, university Innovation Hubs and Incubation centres will be established in few universities at Khulna, Chattogram and Dhaka. Initially KUET and CUET has been selected at Khulna and Chattogram for the purpose. No university has yet been selected at Dhaka. The project would also support Start-up and Scale-up Facilities and Services in the existing Software Technology Parks (STPs).

### 1.2 Purpose of the ESMF

The main purposes of this ESMF are to:

- Provide tools and guidelines for risk categorization of all the sub-projects to be implemented under PRIDE project for which detail information are not available at this stage.
- Set out detail procedures to be followed for various sub-project categories to assess and manage environmental and social risks.

- consider in an integrated manner the potential environmental and social risks, benefits and impacts of the program and identify measures to avoid, minimize and manage risks and impacts while enhancing benefits
- ensure all relevant environmental and social issues are mainstreamed into the design and implementation of the sub-projects
- Provide guidance for preparation of various safeguard documents
- Provide guidance for ensuring stakeholder engagement at various stages of sub-project implementation.

### 1.3 Methodology

The methodology followed in preparing the ESMF consists of the following steps:

- Review Project documents and meeting/discussions with various stakeholders including BHTPA and World Bank
- Review policy and regulatory requirements
- Reconnaissance field visits and initial scoping and screening to determine the key environmental and social parameters and aspects that are likely to be impacted by the Project activities
- Collection and analysis of baseline environmental and social data, with the help of secondary literature review, and field data collection
- Consultations with the stakeholders including beneficiary/ affected communities and developing the consultation process
- Reviewing the potential and likely impacts of the program activities and carrying out the screening of the sub-project.
- Outline detail procedures to be followed to comply with the WB and GoB rules and regulations including preparation of various safeguard documents, monitoring mechanism, stakeholder engagement, disclosure requirement, grievance redress and institutional arrangement.

### 1.4 Structure of the ESMF Report

The ESMF has been structured as follows:

- Chapter 1 Introduction provides a brief overview of the project background, Scope & Purpose of the ESMF, approach & methodology of the project.
- Chapter 2 provides a description & objective of the project, its various components, project area, current land use pattern
- Chapter 3 outlines the relevant policies, legislative and regulatory framework for this project
- Chapter 4 gives information about the baseline conditions in the project influence areas
- Chapter 5 describes potential/expected environmental and social risks and impacts of the project
- Chapter 6 details the procedures to be followed in this Environmental and Social Management Framework
- Chapter 7 includes stakeholder consultation and disclosure objective, methodology & tools for the stakeholder consultation. This chapter also summarizes the stakeholder consultations undertaken to date and also proposed for the project. Grievance redress mechanism outline is also provided within this section.
- Chapter 8 outlines institutional and monitoring arrangements for the project

## CHAPTER 2. PROJECT DESCRIPTION

### 2.1 Components of the Project

The project has four components. The first three components will be implemented by BEZA and the fourth component will be implemented by BHTPA.

**COMPONENT 4: STRENGTHENING THE DIGITAL ENTREPRENEURSHIP AND INNOVATION ECOSYSTEM:** The fourth component will be implemented by BHTPA. It aims to strengthen the foundation of the digital entrepreneurship and innovation ecosystem in Bangladesh. It will create the country's largest agglomeration of IT and ITeS companies in Dhaka's Janata STP and promote digital entrepreneurship more broadly among young professionals and women. It will design and implement a program that supports digital entrepreneurship at three levels. First, it will establish modern and professional start-up and scale-up facilities and services in STPs licensed by BHTPA. Second, it will introduce entrepreneurship and innovation hubs in some of Bangladesh's leading technological universities and business schools. This will also offer accredited and rapid training programs to budding entrepreneurs and managers in the IT and ITeS field. Thirdly, it will offer a media-based challenge program with grant prizes to help change attitudes and attract more youth, women and young professionals to consider becoming entrepreneurs. The goals are: (a) for STPs and leading universities to evolve into entrepreneurship hubs, (b) to increase market entry and growth rates of digital start ups and small and medium-sized enterprises, and (c) to create a gender-inclusive culture for digital entrepreneurship.

Sub-Component 4.1: Establishing Dhaka's first digital entrepreneurship hub in Janata STP (US\$22m) This sub-component will help establish Dhaka as a relevant digital entrepreneurship hub in South Asia. It will do so by facilitating network effects and developing Bangladesh's first significant agglomeration of IT and ITeS firms in the Kawran Bazar area. In 2015, BHTPA converted an old unused municipal building into the Janata STP. It currently rents out the 72,000 ft<sup>2</sup> to 18 small and medium-sized enterprises in addition to some microentrepreneurs hosting 1,000 professionals. It has set aside one floor for an incubation center which currently offers few services. The office space itself is attractive but common facilities and spaces are either lacking or poorly maintained. The STP is popular but lacks in management and services: it should offer structured networking, match making, cross-learning and financial/investment services that would be possible with a more dynamic, private management. The building needs upgrading, improved maintenance of common spaces, and better and extended services. BHTPA is currently acquiring the title to a land plot immediately next door from the Dhaka Municipal Corporation to allow for an expansion of up to 125,000 ft<sup>2</sup> of workspace to create a cluster of roughly 200,000 ft<sup>2</sup> of micro and small digital enterprises in the heart of Dhaka. The current occupants serve both domestic and foreign markets and employ a large share of young women with university degrees.

The sub-component would finance works, goods and technical assistance to: (a) bring in an experienced private operator for Janata-1 and Janata-2 (i.e. the expanded Janata STP) under an open and transparent international competitive bidding process. The transaction advisor will structure a performance-based contract for an operator with a proven track record of managing similar facilities and promoting it to private tenants; and (b) upgrade Janata-1 STP and build Janata-2 STP by adding 125,000 ft<sup>2</sup> of workspace. BHTPA will finance US\$10 million of the works and IDA will finance the remaining amount (up to a maximum of US\$10 million) plus goods and technical assistance. The combined new Janata STP would host approximately 200 micro entrepreneurs, 100 small firms and 30 medium-sized firms in the IT and ITeS space. This approach is in line with the World Bank's recommendations for BHTPA to focus on creating conditions for services to thrive in STPs rather than manufacturing in HTPs.

#### Sub-Component 4.2: Digital Entrepreneurship, training and innovation support program

This sub-component will finance works, goods technical assistance and training to implement a digital entrepreneurship, training and innovation support program to attract more youth, women and professionals to become digital entrepreneurs; provide start-up and scale-up facilities and services for digital entrepreneurs to increase the number of firms that are investment ready; and establish university innovation hubs in technological universities across the country. The activities will be integrated through existing institutions such as universities and STPs to make the outcome as sustainable as possible.

## 2.2 Activities included in ESMF

An ESA has been prepared for the construction of the 12-story extended part of existing Janata Tower STP. However, as detailed information and location of the other activities are not known, they have been included in the ESMF. These are the Start-up and Scale up Facilities and Services in the exiting STPs and innovation and incubation centres to be set up at some of the universities.

The project would finance **Start-up and Scale-up Facilities and Services** to help creating a market for, and raise demand for, mentorship and advisory services that are tailored for entrepreneurs in the digital economy. The facilities and services will be offered to budding and existing entrepreneurs particularly in STPs. The services on offer will include incubation and acceleration support, market entry and market expansion advisory, and investment readiness support to help digital entrepreneurs access external sources of finance and equity funding. The services offered in the Chattogram, Janata and Jashore STPs will be provided by experienced professional operators and initially have a permanent establishment in Dhaka and Chattogram, while the roll-out in Jashore, Kaliakoir and Rajshahi will be made gradually. Entrepreneurs located outside the STPs will be able to access programs to create linkages and network effects in addition to a prospective pipeline of new tenants. It will cover a dedicated program to support women-owned businesses and new entrepreneurs.

**University Innovation Hubs** in Chattagram, Dhaka and Khulna will be established to attract more students to become digital entrepreneurs within leading technological universities and business schools. Professional operators will be engaged to design, operate and then transfer the University Innovation Hubs to the universities in which they are embedded. The project will finance refurbishment/works of the innovation hub spaces in existing universities as well as goods and technical assistance to ensure that these new facilities can attract top talent and service providers. The UIHs will over time be expected to expand to add complementary innovation activities such as hardware prototyping spaces, joint research centers with industry, technology transfer offices, etc. This is in line with the University Grants Commission's (UGC) vision and objectives. The objective is to develop systematic programs that include investment into commercializing research and supporting innovative ideas so that UGC can demonstrate academia's role in the ecosystem. BHTPA will develop and mainstream incubation guidelines for university-based incubation centers which will follow global good practices and focus on outcomes and key principles that would allow flexibility to innovation, local customization and adjustments in order to develop suitable models for universities.

## CHAPTER 3. LEGAL, REGULATORY AND ADMINISTRATIVE FRAMEWORK

### 3.1 Introduction

The ESMF guides the implementing agency in designing and implementation of environmentally sustainable sub-project interventions. It is anticipated that proposed PRIDE interventions at the universities and STPs may have some minor environmental and social impacts. The Environmental and Social Standards (ESSs) of the Bank as well as the national and international conventions, treaties and protocols provide specific guidelines to minimize and/or mitigate environmental impacts resulting from development interventions. This chapter provides a brief summary of relevant ESSs and national and international conventions, treaties and protocols.

### 3.2 World Bank's Environmental & Social Framework

The Bank classifies all projects into one of four categories: High Risk, Substantial Risk, Moderate Risk or Low Risk. In determining the appropriate risk classification, the Bank takes into account relevant issues, such as the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential environmental and social risks and impacts; and the capacity and commitment of the Borrower to manage the environmental and social risks and impacts in a manner consistent with the Environmental and Social Standards (ESS). Other areas of risk may also be relevant to the delivery of environmental and social mitigation measures and outcomes, depending on the specific project and the context in which it is being developed.

#### **ESS 1: Assessment and Management of Environmental and Social Risks and Impacts**

The objective of ESS1 are:

- i. To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs. Adopt a mitigation hierarchy approach to:
  - (a) Anticipate and avoid risks and impacts;
  - (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;
  - (c) Once risks and impacts have been minimized or reduced, mitigate; and
  - (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.
- ii. To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project.
- iii. To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate.
- iv. To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.

#### **ESS 2: Labour and Working Conditions**

The Objectives of ESS 2 are:

- i. To promote safety and health at work.
- ii. To promote the fair treatment, non-discrimination and equal opportunity of project workers.

- iii. To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- iv. To prevent the use of all forms of forced labor and child labor.
- v. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- vi. To provide project workers with accessible means to raise workplace concerns.

### **ESS 3: Resource Efficiency and Pollution Prevention and Management**

The Objectives of ESS 3 are:

- i. To promote the sustainable use of resources, including energy, water and raw materials.
- ii. To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.
- iii. To avoid or minimize project-related emissions of short and long-lived climate pollutants.
- iv. To avoid or minimize generation of hazardous and non-hazardous waste.
- v. To minimize and manage the risks and impacts associated with pesticide use.

### **ESS 4: Community Health and Safety**

The Objectives of ESS 4 are:

- i. To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances.
- ii. To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams.
- iii. To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.
- iv. To have in place effective measures to address emergency events.
- v. To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.

### **ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The Objectives of ESS 5 are:

- i. To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.
- ii. To avoid forced eviction.
- iii. To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- iv. To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.
- v. To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.

- vi. To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

#### **ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources**

The Objectives of ESS 6 are:

- i. To protect and conserve biodiversity and habitats.
- ii. To apply the mitigation hierarchy<sup>4</sup> and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity.
- iii. To promote the sustainable management of living natural resources.
- iv. To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.

#### **ESS 7: Indigenous Peoples/Sub-Saharan African Historically underserved Traditional Local Communities**

The Objectives of ESS 7 are:

- i. To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.
- ii. To avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.
- iii. To promote sustainable development benefits and opportunities for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in a manner that is accessible, culturally appropriate and inclusive.
- iv. To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities affected by a project throughout the project's life-cycle.
- v. To obtain the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the three circumstances described in this ESS.
- vi. To recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.

#### **ESS 8: Cultural Heritage**

The Objectives of ESS 8 are:

- i. To protect cultural heritage from the adverse impacts of project activities and support its preservation.
- ii. To address cultural heritage as an integral aspect of sustainable development.
- iii. To promote meaningful consultation with stakeholders regarding cultural heritage.
- iv. To promote the equitable sharing of benefits from the use of cultural heritage.

#### **ESS 9: Financial Intermediaries**

The Objectives of ESS 9 are:

- i. To set out how the FI will assess and manage environmental and social risks and impacts associated with the sub-projects it finances.

- ii. To promote good environmental and social management practices in the sub-projects the FI finances.
- iii. To promote good environmental and sound human resources management within the FI.

### **ESS 10: Stakeholder Engagement and Information Disclosure**

The Objectives of ESS 10 are:

- i. To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- ii. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- iii. To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.
- iv. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- v. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

For the sub-components covered in this ESMF, the relevant standards are ESS 1, 2, 3, 4, 5, 6 and 10.

### **3.3 World Bank's Environmental, Health & Safety Guidelines**

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). When one or more members of the World Bank Group are involved in a project, these EHS Guidelines are applied as required by their respective policies and standards. These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors. For complex projects, use of multiple industry-sector guidelines may be necessary. A complete list of industry-sector guidelines can be found at: [www.ifc.org/ifcext/enviro.nsf/Content/EnvironmentalGuidelines](http://www.ifc.org/ifcext/enviro.nsf/Content/EnvironmentalGuidelines) The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. Application of the EHS Guidelines to existing facilities may involve the establishment of site-specific targets, with an appropriate timetable for achieving them. The applicability of the EHS Guidelines should be tailored to the hazards and risks established for each project on the basis of the results of an environmental assessment in which site-specific variables, such as host country context, assimilative capacity of the environment, and other project factors, are taken into account.

The applicability of specific technical recommendations should be based on the professional opinion of qualified and experienced persons. When host country regulations differ from the levels and measures presented in the EHS Guidelines, projects are expected to achieve whichever is more stringent. If less stringent levels or measures than those provided in these EHS Guidelines are appropriate, in view of specific project circumstances, a full and detailed justification for any proposed alternatives is needed as part of the site-specific environmental assessment. This justification should demonstrate that the choice for any alternate performance levels is protective of human health and the environment.

## 3.4 Review of National Environmental Acts, Rules, Policies and Strategies

### 3.4.1 Constitution of Bangladesh

Article 18A of the constitution refers to one of the fundamental principles of the state policy regarding protection and improvement of the environment and biodiversity: it states that the State shall endeavour to protect and improve the environment and to preserve and safeguard the natural resources, biodiversity, wetlands, forests and wildlife for the present and future citizens.

### 3.4.2 Bangladesh Environment Conservation Act, 1995

The National Environmental Management Action Plan (NEMAP) is a wide-ranging and multi-faceted plan, which builds on and extends the statements, set out in the National Environmental Policy. NEMAP was developed to address issues and management requirements related to the environment during the period 1995 to 2005; it also sets out the framework within which the recommendations of the National Conservation Strategy are to be implemented. NEMAP was developed to achieve the following broad objectives:

- Identification of key environmental issues affecting Bangladesh;
- Identification of actions necessary to halt or reduce the rate of environmental degradation;
- Improvement of the natural environment;
- Conservation of habitats and bio-diversity;
- Promotion of sustainable development; and
- Improvement of the quality of life of the people.

To attain the above-mentioned objectives, the plan groups all the relevant necessary actions under four headings, namely: institutional, sectoral, location-specific and long-term issues.

### 3.4.3 Environment Conservation Rules, 1997

The ECR, 1997 is the first set of rules promulgated under the ECA, 1995. These rules provide for, inter alia, the following:

- The NEQS for ambient air, surface water, groundwater, drinking water, industrial effluents, emissions, noise, and vehicular exhaust;
- Categorization of industries, development projects, and other activities on the basis of actual (for existing industries/development projects/activities) and anticipated (for proposed industries/development projects/activities) pollution load;
- Procedure for obtaining ECC;
- Requirements for undertaking IEE and EIA's as well as formulating EMP according to categories of industries/development projects/activities; and
- Procedure for damage-claim by persons affected or likely to be affected due to polluting activities or activities causing hindrance to normal civic life.

### 3.4.4 Bangladesh Climate Change Strategy and Action Plan (BCCSAP)'09

The GOB also 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. There are 44 specific programs proposed in the BCCSAP under six themes.

### 3.4.5 National Environmental Policy, 1992

The Bangladesh National Environmental Policy, approved in May 1992, sets out the basic framework for environmental action together with a set of broad sectoral action guidelines. Key elements of the Policy are:

- Maintaining ecological balance and ensuring sustainable development of the country through protection, conservation and improvement of the environment;
- Protecting the country from natural disasters;
- Identifying and regulating all activities that pollute and destroy the environment;
- Ensuring environment-friendly development in all sectors;
- Ensuring sustainable and environmentally sound management of the natural resources; and
- Promoting active association, as far as possible, with all international initiatives related to environment.

### 3.4.6 National Water Policy, 1999

The NWP promulgated in 1999 with the intention of guiding both public and private actions in the future for ensuring optimal development and management of water that benefit both individuals and the society at large.

### 3.4.7 Standing Order on Disaster, 2010

In order to manage the paradigm, shift in disaster management, a disaster management regulatory framework is established under which the Bangladesh Disaster Management Framework is implemented, and in which the work of Ministries, Departments, NGOs and civil society are undertaken. The regulatory framework provides the relevant legislative, policy and best practice framework under which the activity of Disaster Risk Reduction (DRR) and Emergency Response Management (ERM) in Bangladesh is managed and implemented.

### 3.4.8 National Fisheries Policy, 1999

The Fisheries Policy highlights the need to conserve fish breeding grounds and habitats. It intends to promote fisheries development and conservation in all water bodies. The projects should consider these policies to protect the habitats, migration and connectivity of fish and fisheries resources around the project area. Measures to reduce any potential negative impacts on local fish populations will be incorporated into all stages of the project.

### 3.4.9 National Strategy for Waste Management

The strategy for solid waste management is essential in order to minimize the environmental, social and economic problems. To minimize these problems, recently the GoB has taken some initiatives and accordingly in December 2010, the DoE under MOEFCC has formulated a national “3R” strategy for waste management in a draft form. It is the latest strategy which will take time to implement globally. For the proposed project, the “3R” strategy shall be followed to minimize the waste impact on the environment.

The principle of “3R” is stated as reducing waste, reusing and recycling resources and products.

- Reducing means choosing to use with items with care to reduce the amount of waste generated.
- Reusing involves the repeated use of items or parts of items which still have usable aspects.
- Recycling means the use of waste itself as resources.

### 3.4.10 The Groundwater Management Ordinance, 1985 (Ordinance No. xxvii of 1985)

This is an ordinance to manage groundwater resources. This Act authorizes the Thana Parishad to grant a license for installing tubewells under its jurisdiction. The Upazilla/Thana Parishad may grant the license if the Parishad is satisfied that the installation of the tubewell applied for:

- Will be beneficial to the areas where it is to be installed, or
- Will not have any adverse effect upon the surrounding areas, or
- Is otherwise feasible.

The EZ project will comply with this ordinance by managing groundwater resources. Tubewell shall not be installed in any place without the license granted by Upazilla Parishad.

### 3.4.11 The Protection and Conservation of Fish Act, 1950

The Act was enacted to provide for the protection and conservation of fish. Under the Act, the Protection and Conservation of Fish Rules were adopted in 1985. This is a set of rules in line with the overall objectives of the Act. Rule 5 of the Rules provides that no person shall destroy or make any attempt to destroy any fish by explosives, gun, bow, and arrow in inland waters or within coastal waters.

### 3.4.12 National Land Use Policy, 2001

The NLUP, enacted in 2001, aims at managing land use effectively to support trends in accelerated urbanization, industrialization and diversification of development activities. The NLUP urges that increasing the land area of the country may be not possible through artificial land reclamation process, which is cost-effective only in the long run. Major content of this policy are following:

- Stopping the high conversion rate of agricultural land to non-agricultural 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;
- Improving the environmental sustainability of land-use practices.

### 3.4.13 Bangladesh Labour Act, 2006

The Bangladesh Labour Act, 2006 provides the guidance of employer's extent of responsibility and workmen's extent of right to get compensation in case of injury by accident while working. Some of the relevant Sections are:

Section 150. Employer's Liability for Compensation: (1) If personal injury is caused to a workman by accident arising out of and in the course of his employment, his employer shall be liable to pay compensation in accordance with the provisions of this Act; and (2) Provided that the employer shall not be liable-

(a) in respect of any injury which does not result in the total or partial disablement of the workman for a period exceeding three days; (b) in respect of any injury, not resulting in death or permanent total disablement, caused by an accident which is directly attributable to-

(i) the workman having been at the time thereof under the influence of drink or drugs, or (ii) the wilful disobedience of the workman to an order expressly given, or to a rule expressly framed, for the purpose of securing the safety of workmen, or (iii) the wilful removal or disregard by the workman of any safety guard or other device which he knew to have been provided for the purpose of securing the safety of workmen.

Section 151. Amount of Compensation: Subject to the provisions of this Act, the amount of compensation shall be as follows, namely:-

(a) where death results an amount equal to fifty from the injury cent of the monthly wages of the deceased or

kman multiplied by the relevant factor; or an amount of fifty thousand rupees, whichever is more; (b) where permanent total amount equal to disablement results from sixty the injury percent of the monthly wages of the injured workman multiplied by the relevant.

#### **3.4.14 The Penal Code, 1860**

The Penal Code of 1860 has some valid provisions related to pollution management, environment protection and protection of health and safety. Chapter XIV of the Penal Code provides offenses effective public health, safety, convenience, decency, and morals; Section 277: Falling Water or Public Spring or Reservoir; Section 278: Making Atmosphere Noxious to Health; Section 284: Negligent Conduct with Respect to Poisonous Substance; Section 285: Negligent Conduct with Respect to Fire or Combustible Matter; and Section 286: Negligent Conduct with Respect to Explosive Substance. According to the Section 277, whoever voluntarily corrupts or fouls the water of any public spring or reservoir, to render it less fit for the purpose for which it is ordinarily used will be punished under the law. According to the Section 278, whoever voluntarily vitiates the atmosphere in any place so as to make it noxious to the health of persons in general dwelling or carrying on business in the neighborhood or passing along a public way will get punishment.

#### **3.4.15 Wildlife Conservation (Protection and Safety) Act, 2012**

The act has been formulated for the conservation and safety of wildlife to manage the protected areas. The act depicts 10 new types of protected areas. The bill with many other provisions proposed stern action for violation of the law. It proposed one-year imprisonment and Taka 50,000 fine for such violation. The law also proposed at least two years and the highest seven years of imprisonment and minimum Taka one lakh and maximum Taka 10 lakh fine for killing a tiger or an elephant.

*The act is applicable for the proposed EZ for conservation and safety of wildlife, management of protected areas, preservation of Wildlife Sanctuaries, parks, reserves.*

#### **3.4.16 The Forest Act, 1927 and the Forest (Amendment) Act, 2000**

The Forest Act, 1927 is the first and omnibus law of the land for forestry. It provides for reserving forests over which the Government has an acquired property right. According to the Act the Government (Forest Department) can prohibit certain activities in the declared Reserved Forest areas such as any intervention kindles, keeps or carries any fire; trespasses or pastures cattle, or permits cattle to trespass; causes any damage by negligence in felling any tree or cutting or dragging any timber; etc.

#### **3.4.17 Bangladesh National Building Code (BNBC), 2015 (final draft)**

The Bangladesh National Building Code (BNBC) clearly sets out the constructional responsibilities according to which the relevant authority of a particular construction site shall adopt some precautionary measures to ensure the safety of the workmen. The BNBC also stipulates the general duties of the employer to the public as well as workers.

#### **3.4.18 Industrial Policy, 1999**

The Industrial Policy, 1999 was perhaps the most comprehensive policy, which sought to give the private sector a dominant role: Focus the role of the government as a facilitator in creating an enabling environment for expanding private investment

### 3.4.19 National Agriculture Policy, 2013

The National Agriculture Policy, 2013 approved by the Government focuses on agriculture reproduction, alleviating poverty through generating jobs and ensuring food security. The main objective of the policy is to ensure 'food and nutrition security for all and improvement of rural livelihoods through increased crop production with higher productivity and creating employment opportunities through diversification of agricultural activities. The policy outlined nine specific objectives. Although the policy does not emphasize the coastal zone separately, all specific objectives are applicable to the development of coastal zone agriculture.

### 3.4.20 Bangladesh Country Investment Plan (CIP), 2011

The Bangladesh Country Investment Plan provides a coherent set of priority investment programs to improve food security and nutrition in an integrated way. It is a comprehensive plan, build on the existing framework, reflects the Government's investment priorities and aims to: (i) plan and invest resources in a coordinated way; (ii) increase convergence and alignment of budget and external sources of funding, and; (iii) to mobilize additional resources. Proposed investments relate to strengthening physical, institutional and human capacities in the field of agriculture, water management, fisheries, livestock, agricultural marketing, food management, safety nets, and nutrition and food safety.

## 3.5 Review of National Social Acts, Rules, Policies and Strategies

### 3.5.1 Constitutional Rights of the Tribal Peoples

The Constitution of Bangladesh ensures affirmative action for indigenous peoples and prohibits discrimination on inter alia on 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 favour of women or children or for the advancement of any backward section of citizens".

### 3.5.2 The Acquisition and Requisition of Immovable Property Act (ARIPA), 2017

#### 3.5.2.1 Legal Framework for Land Acquisition in Bangladesh

The principal legal instrument governing land acquisition in Bangladesh is the Acquisition and Requisition of Immovable Property Act, 2017 (ARIPA 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. The ARIPA, however, excluded the acquisition of properties used by the public for the purpose of religious worship, graveyards and cremation grounds. The Act stipulates certain safeguards for the landowners and provides for payment of "fair value" for the properties acquired.

### 3.5.3 Bangladesh EPZ/EZ Labor Law Ordinance No 01, 2019:

Chapter 3 of this law states that women workers of an industry should not be engaged in any kind of work in the very next of eight (08) months of the birth of her children. She will not be engaged in any kind of work which are too difficult or she have to stand for long time in the prior or post of the birth of her children. She will be paid for total eight (08) weeks both in the prior (04 weeks) and after (04 weeks) of the birth of her children. Chapter 4 of this law emphasis on the occupational health safety, Cleanliness, safe work environment, safety and welfare management. Any specific target or amount has not been set for occupational health safety, Cleanliness, safe work environment, safety and welfare management.

Chapter 7 of this law describes wage board for minimum salary. It clearly states that any worker should not be engaged in the salary less than minimum salary.

## **CHAPTER 4. ENVIRONMENTAL AND SOCIAL BASELINE**

Under the project, university Innovation Hubs and Incubation centres will be established in few universities at Khulna, Chattogram and Dhaka. Initially Khulna University of Engineering and Technology (KUET) and Chattagram University of Engineering and Technology (CUET) has been selected at Khulna and Chattagram for the purpose. No university has yet been selected at Dhaka but Bangladesh University of Engineering and Technology (BUET) and Dhaka University (DU) is in the consideration. The project would also support Start-up and Scale-up Facilities and Services in the existing Software Technology Parks (STPs). The environmental and social baseline of in and around of these universities has been included in this ESMF for reference.

### **4.1 Chattogram University of Engineering and Technolgy (CUET)**

#### **4.1.1 Environmental Baseline**

The university campus covers an area of 171 Acres. Currently there are around 4500 number of students including undergraduate, graduate and post-graduate with 900 students graduating each year. Also, at present, there more than 550 academic and administrative staffs in the campus.

Chittagong straddles the coastal foothills of the Chittagong Hill Tracts in south-eastern Bangladesh. The Karnaphuli River runs along the southern banks of the city, including its central business district. The river enters the Bay of Bengal in an estuary located 12 kilometres (7.5 mi) west of downtown Chittagong. Mount Sitakunda is the highest peak in Chittagong District, with an elevation of 351 metres (1,152 ft). Within the city itself, the highest peak is Batali Hill at 85.3 metres (280 ft). Chittagong has many lakes that were created under Mughal rule. In 1924, an engineering team of the Assam Bengal Railway established the Foy's Lake.

The Chittagong region is known for its rich biodiversity. Over 2000 of Bangladesh's 6000 flowering plants grow in the region. Its hills and jungles are laden with waterfalls, fast flowing river streams and elephant reserves. St. Martin's Island, within the Chittagong Division, is the only coral island in the country. The fishing port of Cox's Bazar is home to one of the world's longest natural beaches. In the east, there are the three hill districts of Bandarban, Rangamati, and Khagrachari, home to the highest mountains in Bangladesh. The region has numerous protected areas, including the Teknaf Game Reserve and the Sitakunda Botanical Garden and Eco Park. Patenga beach in the main seafront of Chittagong, located 14 kilometers (8.7 mi) west of the city.

The campus of CUET is landscaped around a valley with hilly areas and plant varieties making the campus a natural arboretum. Facilities include academic buildings, administration building, auditorium, library, computer center, workshop, research laboratories, halls of residence, teachers' quarter, canteens and central mosque. The university has inside its boundaries a bank, a post office, three canteens, a DRMASS telephone exchange, two card-phone booths, a PABX, a phone and fax caterer, a large auditorium, two galleries for holding conference, a two-storied central mosque having a floor area of 560 square meters, and two minimarts for general needs. Since this is a university campus, no local households are present within the boundaries

Chittagong has a tropical monsoonal climate (Köppen-Geiger classification: Am) with a dry season and a heavy monsoon the rest of year, no cold season. According to the Holdridge life zones system of bioclimatic classification Chittagong is situated in or near the tropical moist forest biome. The annual mean temperature is 25.1 degrees Celsius (77.2 degrees Fahrenheit). Average monthly temperatures

vary by 9 °C (16.2°F). This indicates that the continentality type is hyper-oceanic, subtype barely hyper-oceanic.

Chittagong gets hold of on average 2735 mm (107.7 in) of rainfall per year, or 227.9 mm (9 in) per month. On average there are 135 days per year with more than 0.1 mm (0.004 in) of rainfall (precipitation) or 11.3 days with a quantity of rain, sleet, snow etc. per month. The driest weather is in January when an average of 6 mm (0.2 in) of rainfall (precipitation) occurs. The wettest weather is in July when an average of 598 mm (23.5 in) of rainfall (precipitation) occurs.

#### **4.1.2 Socio-economic Baseline**

Chittagong has a population of more than 2.5 million, and its Metropolitan Area has a population of 4,009,423. By gender, the population was 54.36% male and 45.64% female, and the literacy rate in the city was 60 percent, in 2002. Muslims at 86% form the overwhelming majority of the population and rest being 12% Hindus and 2% other religions.

Chittagong was a melting pot of ethnicities during the Bengal Sultanate and Mughal Bengal periods. Muslim immigration started as early as seventh century, and significant Muslim settlements occurred during medieval period. Muslim traders, rulers and preachers from Persia and Arabs were the early Muslim settlers, and descendants of them are the majority of current Muslim population of the city. The city has a relatively wealthy and economically influential Shia Muslim community, including Ismailis and Twelver Shias. The city also has many ethnic minorities, especially members of ethnic minority groups from the frontier hills of Chittagong Division, including Chakmas, Rakhines and Tripuris; as well as Rohingya refugees. The Bengali-speaking Theravada Buddhists of the area, known as Baruas, are one of the oldest communities in Chittagong and one of the last remnants of Buddhism in Bangladesh. Descendants of Portuguese settlers, often known as Firingis, also live in Chittagong, as well as Catholics, who largely live in the old Portuguese enclave of Patharghata. There is also a small Urdu-speaking Bihari community living in the ethnic enclave known as Bihari Colony.

Like other major urban centers in South Asia, Chittagong has experienced a steady growth in its slum settlements as a result of the increasing economic activities in the city and emigration from rural areas. According to a poverty reduction publication of the International Monetary Fund, there were 1,814 slums within the city corporation area, inhabited by about 1.8 million slum dwellers, the second highest in the country after the capital, Dhaka. The slum dwellers often face eviction by the local authorities, charging them with illegal abode on government lands.

A substantial share of Bangladesh's national GDP is attributed to Chittagong. The City generated approximately \$25.5 billion in nominal (2014) and US\$67.26 billion in PPP terms converted from nominal GDP of \$25.5 Billion dollars with a nominal vs. PPP factor of 2.638, contributing around 12% of the nation's economy. Chittagong generates for 40% of Bangladesh's industrial output, 80% of its international trade and 50% of its governmental revenue. The Chittagong Stock Exchange has more than 700 listed companies, with a market capitalization of US\$32 billion in June 2015. The city is home to many of the country's oldest and largest corporations. The Port of Chittagong handled US\$60 billion in annual trade in 2011, ranking 3rd in South Asia after the Port of Mumbai and the Port of Colombo.

## **4.2 Khulna University of Engineering and Technology (KUET)**

### **4.2.1 Environmental Baseline**

Khulna is the 3rd largest city after Dhaka and Chittagong. Khulna is located in south-western Bangladesh at 22°49'0"N 89°33'0"E, on the banks of the Rupsha and Bhairab river. It covers a total area of 59.57 km<sup>2</sup>, while the district itself is about 4394.46 km<sup>2</sup>. It lies south of Jashore and Narail, East of Satkhira, West of Bagerhat and North of the Bay of Bengal. It is part of the largest delta in the world. In the southern part of the delta lies the Sundarban, the world's largest mangrove forest. The city of Khulna is

in the northern part of the district and is mainly an expansion of trade centers close to the Rupsha and Bhairab rivers. The Mayur River forms the western boundary of the metropolitan area. Khulna University of Engineering & Technology (KUET) is at Fulbarigate, the northwest part of Khulna City at 22°54'3"N 89°30'5"E.

The city is humid during summer and pleasant in winter. Khulna has an annual average temperature of 26.3 °C (79.3 °F), with monthly average temperatures from 12.4 °C (54.3 °F) in January to 34.3 °C (93.7 °F) in May. Its annual average rainfall is 1,809.4 millimeters (71.24 in), and about 87 percent falls between May and October.

#### **4.2.2 Soci-economic Baseline**

In the 2011 census, Khulna had a population of 663,342. The city and its metropolitan area had an estimated 2014 population of 1.022 million. Its population density is about 19,000 inhabitants per square kilometre (49,000/sq. mi). The city's literacy rate is 59.1 percent, higher than the national average of 56.5 percent.

Most of Khulna's population is Bengali, like the rest of Bangladesh. Residents of the city are known as Khulnaiya. Its population is also composed of people from neighboring districts and from Barisal and Faridpur Divisions. Many people from Noakhali District live in the city, which also has a Bihari population. Most residents of Khulna speak Bengali (the national language, its dialects and regional languages. English is understood by a large segment of the population, especially for business. There is a minority Urdu-speaking population, descendants of Muslims displaced from eastern India in 1947 who sought refuge in East Bengal.

Islam is Khulna's major religion, followed by 80.12 percent of the population. Other religions are Hinduism (19.11 percent), Christianity (0.67 percent) and Buddhism (0.04 percent).

Khulna is Bangladesh's third-largest economic center. North of the Port of Mongla, it has a variety of light and heavy industry. Major sectors are jute, chemicals, fish and seafood packaging, food processing, sugar milling, power generation and shipbuilding. The KCCI regulates commerce through its Licensed Measurers' Department (LMD) and certification, attestation and publicity departments of this area. The region has an Export Processing Zone, which has attracted foreign investment. The city is home to branch offices of a number of national companies, including M. M. Ispahani Limited, BEXIMCO, James Finlay Bangladesh, Summit Power and the Abul Khair Group. The largest companies based in the city include Khulna Shipyard, Bangladesh Cable Shilpa Limited, Bangladesh Oxygen, Platinum Jubilee Mills, Star Jute Mills and the Khulna Oxygen Company.

### **4.3 Proposed Innovation Hub at Dhaka**

University campus yet to be selected. However, Dhaka University and BUET campus is in the consideration and baseline of these universities have been captured.

#### **4.3.1 Environmental Baseline**

BUET campus is in the heart of the city of Dhaka. It has a compact campus with hall of residence within walking distance of the academic buildings. At present the campus occupies 83.9 acres (33.95 hectares) of land. The academic area itself occupies 31.81 acres (12.87 hectares) of land defined by Shahid Sharani, Bakshi Bazar road, Nilkhet and Asian highway. The physical expansion of the university over the last few years has been quite impressive.

University of Dhaka the oldest and largest university in Bangladesh and one of the oldest and most distinguished institutions for higher education and research in the Indian Subcontinent. The University was established in 1921 under the Dacca University Act 1920 of the Indian Legislative Council. It was established in the Ramna area of Dhaka City with approximately 600 acres of land.

The climate is sub-tropical, with a typical three season pattern. Rainfall is <30 mm per month and average temperatures around 20°C. Temperatures start to rise in March and reach the annual maximum of around 29°C in April-May, when daytime temperatures can exceed 40°C. The monsoon begins in May-June as hot air rises over the Indian subcontinent, creating low pressure areas into which rush the cooler moisture-laden winds from the Indian Ocean and the Bay of Bengal. Around 70-80 % of the annual rain falls during this time. The rain is often accompanied by strong winds, sometimes exceeding 100 kilometers per hour. Temperature and rainfall both decline post-monsoon, returning rapidly to the winter lows.

## **CHAPTER 5. IDENTIFICATION OF POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES**

### **5.1 Background**

The objective of the project is to establish a world class business environment for targeted high growth industrial sector and new business and to develop indigenous technological capability for the development of the local industries. Thus, the IT Business Incubators will have a positive impact in innovation and entrepreneurship, research and development among IT Professionals, Entrepreneurs, and Graduates of the Academic Institutions.

It is expected that the negative impacts will be of low frequency and can be easily mitigated by applying the best methods and appropriate mitigation measures. Those mitigation measures should be in line with the provisions of the World Bank ESF, EHSGs and GIIP, and in accordance with the requirements of national legislation.

Though the Project is expected to have some positive social impacts, there may be some concern about the environmental and social aspects related to the activities of project implementation period. Although the three Incubation centers will be located at three or more different places, major activities for the establishment of the centers would be common. For example, site clearing work/renovation activities, setting up small stock yards for typical pre-construction phase activities. For the identified project, typical impacts on physio-chemical environment (air, noise, waste generation etc.), biological environment (terrestrial and aquatic flora fauna) and socio-economic environment (OHS, community interruption, labor influx, etc.) are expected. However, it is expected that the extent and scale of the impacts will be of low frequency and can be easily mitigated by applying the best methods and appropriate mitigation measures. Those mitigation measures should be in line with the provisions of the World Bank ESF, EHSGs and GIIP, and in accordance with the requirements of national legislation. In order to assess expected environmental and social issues, it is necessary to consider the major sub-project activities during different project phases (e.g. pre-construction, construction, operation).

There are some common impacts during pre-construction and construction/renovation phase for the establishments of the incubation centers. For example, impacts during the construction/renovation phase may include:

- Operation of vehicles and equipment during site preparation and construction, hauling of equipment is likely to increase the noise level and dust emission in the buildings
- Generation of solid waste (if any) can block drainage channels and contaminate land resources if not handled properly
- Since the Incubators will be in university areas and since traffic movement is minimal there, additional vehicle movement can create congestions particularly in areas where the settlements will be situated
- Operation of project equipment, vehicle movement, generators, labor concentration is likely to increase the noise level and dust emission which can cause interruption to academic settings in the university area

### **5.2 Positive Social Impacts**

The proposed Project is expected to have some positive social impacts such as:

- In the long run, the subprojects will contribute to an overall improvement in government effectiveness
- It will improve investment climate, and potentially contributing to more investment
- Will create new jobs in the IT sector of the country
- Will promote innovation and entrepreneurship, research and development among IT professionals, entrepreneurs, and graduates of the academic institutions.

Also in terms of the construction work to be undertaken, there are also several positive impacts associated with the civil works such as

- Employment of local labor, creation of jobs.
- Improvement of associated existing infrastructure (improved waste management and sanitation facilities)
- Positive economic impacts on small market suppliers for raw materials needed during construction (i.e. building materials).

### **5.3 Negative Social Impacts**

#### **5.3.1 Community Health and Safety Risks**

Since there are no mass level constructions of infrastructure the overall risk of the Project is low. Though there may be a need for some construction (small construction or renovation or rearrangement) of the centers within existing buildings, it is expected to have minimal community and health safety risks. But if construction other than this is required, there may be some impact like the construction works may expose workers to occupational risks due to handling of machinery, construction noise and manual handling, etc. If there is construction activities of vegetation clearing, excavation, materials delivery may generate dust that will pollute the air and this may affect the respiratory system. Construction sites may be a source of both liquid and solid wastes.

#### **5.3.2 Land and Livelihoods**

The Incubation Centers will be established within the university campus, the centers are likely to be housed inside existing buildings of the university. So this will not affect the land or livelihood of the campus but if any new construction is required at any of the sites then the potential impacts of sub-projects to land and livelihoods may include direct or indirect changes of land use; loss of income through temporary or permanent change in land or other resource use. Since the location of the subprojects will be inside the university boundaries, it is not expected that there will be any land acquisition or people would need to relocate or resettle, although the Resettlement Policy Framework (RPF) allows for this should it be needed in exceptional cases.

#### **5.3.3 Impacts on Cultural and Historic Heritage**

As the location of the subprojects will be inside the university boundaries, there will be no cultural or historic heritages in those locations. There are also no archeological site in the proposed locations.

#### **5.3.4 Labor Influx**

The Project is expected to stimulate minimal in-migration. Several features of the Project could prompt in-migration. For example, construction works or establishment of the centers may require construction workers, IT professionals, administrative staffs etc. This is likely to act as a magnet for people and are likely to attract some in-migrants .

### 5.3.5 HIV & AIDS Impacts

There will be very minimal in-migration of people from different regions, and it is not expected that it will have a major impact on health issues. But we cannot deny that this low labor influx can have some behavioural influences which may increase the spread of diseases such as Human Immuno-Deficiency Virus (HIV), Acquired Immune Deficiency Syndrome (AIDS) and other Sexually Transmitted Infections (STIs).

### 5.3.6 Gender Equity, Sexual Harassment

The construction related works for establishing the centers are minimal. Most construction workers will be most likely predominantly younger men. And if they are far away from home on the construction job, they are typically separated from their family and act outside their normal sphere of social control. This can lead to inappropriate and criminal behavior, such as sexual harassment of women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community.

### 5.3.7 Air and Dust Pollution

Due to movement of vehicles, cutting and filling for construction/renovation works (if required) can contribute to air and dust pollution. This can lead to impacts to the surrounding environment of the buildings where the centers will be set up.

### 5.3.8 Noise and Vibration

Increased noise level (noise from the mechanical machinery and equipment, vehicles, construction and renovation works etc.) may occur during the establishment of the centers. If there is excessive noise and vibration it can cause nuisance to ongoing academic classes in the situated buildings.

### 5.3.9 Traffic

Though there will not be that much loaded transports for the project construction works but since the places are within university areas where roads are very minimal there can be some sort of congestion in the day time.

## 5.4 Typical Mitigation Measures

The ESMF suggests a broad range of mitigation and enhancement measures to reduce negative impacts and enhance benefits of the establishment of the Incubation centers. Mitigation measures are identified and designed to avoid or eliminate or offset adverse environmental impacts, or reduce them to acceptable levels during both construction and operation phases of a project intervention. Example mitigation measures for environmental and social issues for the project is provided in Annex D.

Some common mitigation measures (applicable for all the Incubation centers) are as follows:

- Any organic wastes from construction camp site or any source at construction site should be properly collected and composted
- Encourage use of renewable energy, such as solar, wind or biomass energy, to meet energy requirements to reduce carbon footprints of buildings during construction and operation phases.
- Emission of dust can be mitigated by a number of measures together or separately.

- Ensure that all vehicles, and electrical devices used in the project area will comply with technical and environmental safety regulations
- Install dust cover on vehicles at the construction sites and during transportation in the university area. Dust control (watering dusty areas) on non-paved campus roads
- Schedule the operation times for vehicles, machines working in the construction area to reduce air emissions
- Use of adapted Protective Personal Equipment (ear plugs, goggles, helmets, gloves, masks) where necessary
- Noise pollution may be mitigated to certain degrees following the measures: Perform the pre-construction activities within at night time and minimize work done during the day-time. Regulate the speed limitation for vehicles (if there are any) inside the university areas.
- For aesthetic reasons maintain cleanliness within the sites/facilities
- Prepare an effective plan to reduce GBV
- Prepare and implement RAP to acquire land (very less likely but if required)

## CHAPTER 6. METHODOLOGICAL FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

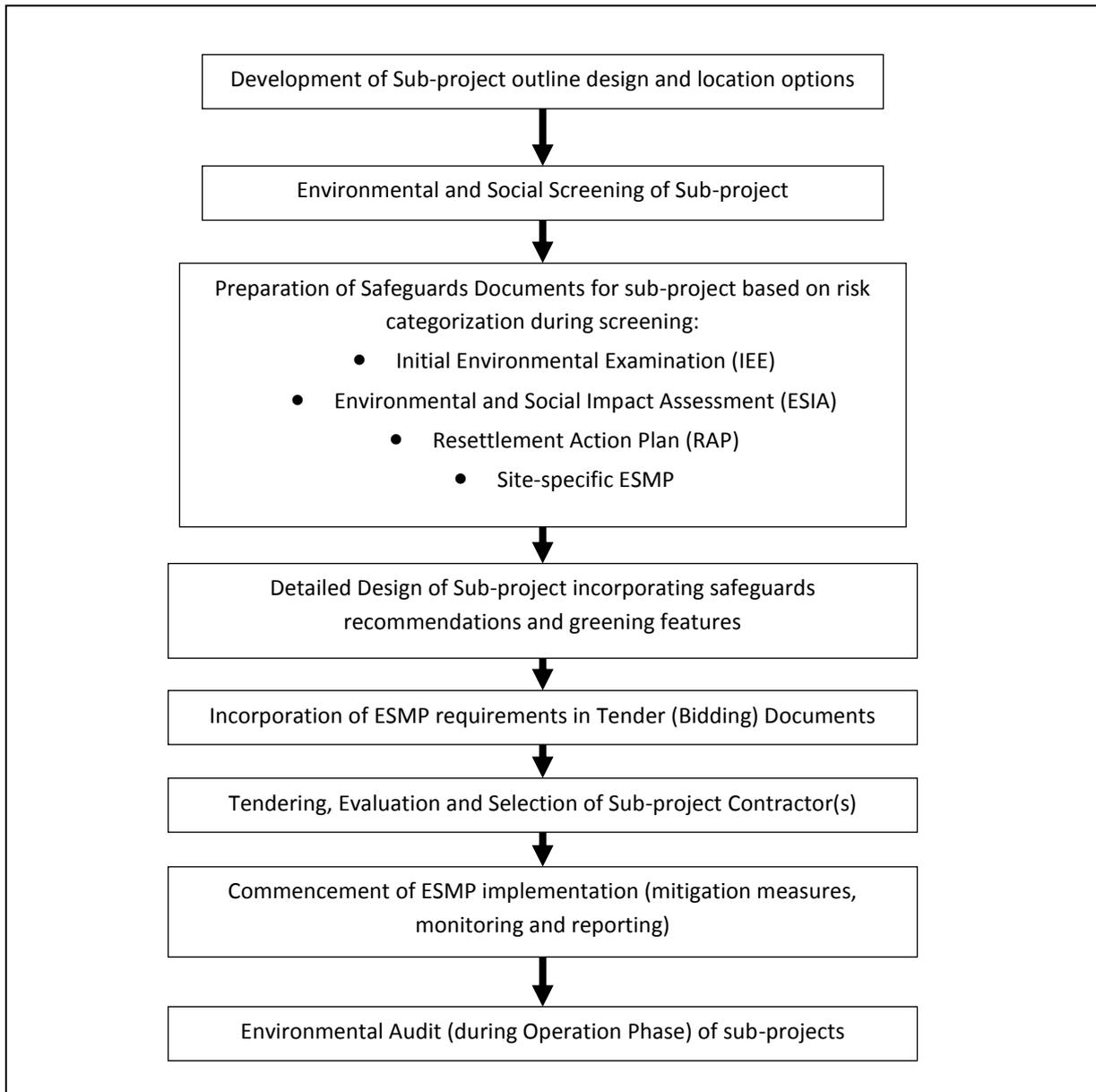
### 6.1 Introduction

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. The environmental and social assessments need to be carried out based on the provisions of the Environment Conservation Rules 1997 and the relevant World Bank's ten (10) Environmental and Social Standards (ESSs).

### 6.2 Environmental and Social Management Procedure

#### 6.2.1 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 safeguards documents such as IEE/ESA, ESIA, RAP and ESMP. The recommendations from these safeguards documents need to be incorporated by the detailed design team and also incorporated into the tender (bidding) documents. After selection of the contractor(s), site preparation activities will commence and at the same time ESMP implementation will begin. This will involve carrying out the proposed mitigation measures, monitoring and reporting activities for the sub-project.



**Figure 6-1: Overall Environmental and Social Management Procedure**

### 6.2.2 Sub-Project Screening and Categorization

The formal environmental and social assessment starts with the Environmental and Social Screening of proposed interventions (**Annex A& Annex B**). The purpose of the environmental screening is to get relevant concerns addressed in the design phase of the project. 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 BHTPA 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 BHTPA under PRIDE project.

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.

Environmental and social risk classification takes into account relevant potential risks and impacts, such as:

- a. the type, location, sensitivity and scale of the Project including the physical considerations of the Project; type of infrastructure (e.g., dams and reservoirs, power plants, airports, major roads); volume of hazardous waste management and disposal;
- b. the nature and magnitude of the potential ES risks and impacts, including impacts on greenfield sites; impacts on brownfield sites including (e.g., rehabilitation, maintenance or upgrading activities); the nature of the potential risks and impacts (e.g. whether they are irreversible, unprecedented or complex); resettlement activities; presence of Indigenous Peoples; and possible mitigation measures considering the mitigation hierarchy;
- c. the capacity and commitment of the Borrower to manage such risks and impacts in a manner consistent with the ESSs, including the country's policy, legal and institutional framework; laws, regulations, rules and procedures applicable to the Project sector, including regional and local requirements; the technical and institutional capacity of the Borrower; the Borrower's track record of past Project implementation; and the financial and human resources available for management of the Project;
- d. other areas of risk that may be relevant to the delivery of ES mitigation measures and outcomes, depending on the specific Project and the context in which it is being developed, including the nature of the mitigation and technology being proposed, considerations relating to domestic and/or regional stability, conflict or security.

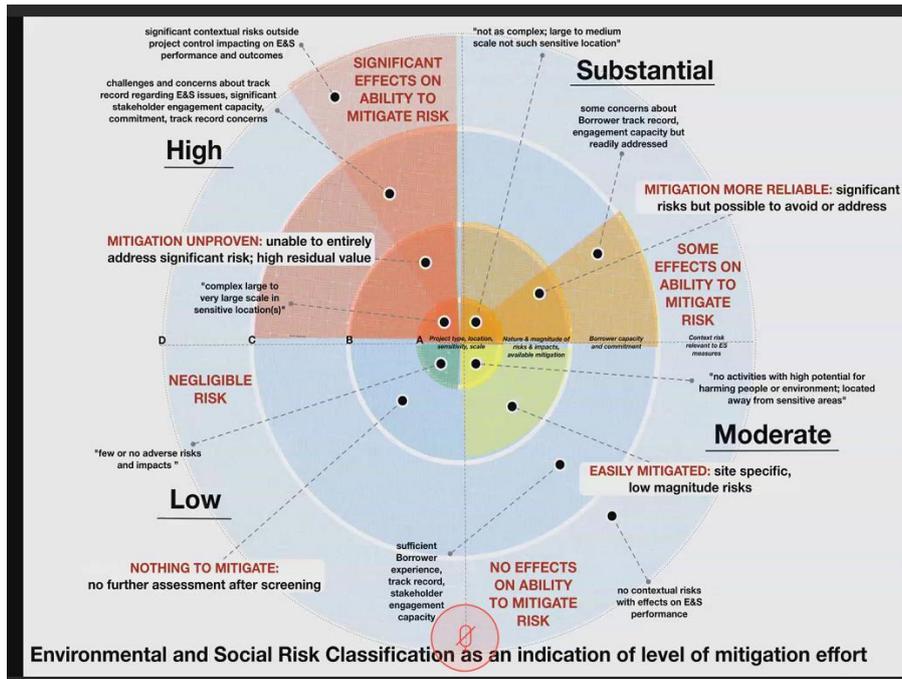
Though the PRIDE project has been categorised as a **High Risk** one after considering, in an integrated manner, the risks and impacts of the Project, the sub-components that have been considered in this ESMF, the risk will be likely **moderate**.

A project is classified as **Moderate Risk** after considering, in an integrated manner, the risks and impacts of the Project, taking into account the following, as applicable:

a. the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the Project is not complex and/or large, does not involve activities that have a high potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. As such, the potential risks and impacts and issues are likely to have the following characteristics:

- (i) predictable and expected to be temporary and/or reversible;
- (ii) low in magnitude;
- (iii) site-specific, without likelihood of impacts beyond the actual footprint of the Project; and
- (iv) low probability of serious adverse effects to human health and/or the environment (e.g., do not involve use or disposal of toxic materials, routine safety precautions are expected to be sufficient to prevent accidents, etc.).

b. The Project's risks and impacts can be easily mitigated in a predictable manner. Though the project activities may be categorized as "moderate" in an aggregate manner, the ESMF mandates that all sub-projects are to be screened to determine the category as this categorization may vary depending on the location and design of a sub-project.



The outcome of the screening process is to categorize the sub-project in terms of its environmental and social risks. PRIDE sub-projects will be categorized as: High, Substantial, Moderate or Low based on ESS of WB and as per ECR 1997 categories are: Green, Orange A, Orange B and Red. Thus, considering potential environmental impacts and their significance, proposed sub-project interventions identified in the initial stage of implementation will be categorized into four levels:

- 1) High Risk
- 2) Substantial Risk
- 3) Moderate Risk
- 4) Low Risk

### 6.2.3 Assessment Procedures

#### 6.2.3.1 High and Substantial Risk Sub-Projects

As per the procedures provided in the table below, for High and Substantial Risk Category sub-projects, detailed ESIA will be required. These should include site-specific information (e.g. environmentally sensitive areas, or need to better define and understand potential issues, brief description of impacts specifying well defined mitigating measures and adopting accepted operating practices and monitoring).

**Table 6-1: Procedures for High and Substantial Risk Sub-Projects**

Sub-Project Phase	Procedure
<b>Project Identification / Pre-Feasibility</b>	Social and Environmental Screening of sub-project (Annex A and A)
	Consultations with key stakeholders (as per SEP)
<b>Feasibility Study / Design</b>	Conduct ESIA
	Public consultations (as per SEP)
	If required, prepare of RPF and RAP.
	If required, prepare Cultural Heritage Management Plan.
<b>Detailed Design &amp;</b>	Ensure Mitigation measures (from ESMP) are included in Design

Sub-Project Phase	Procedure
<b>Tendering</b>	Ensure ESMP and LMP aspects are included in Bidding Documents
<b>Construction Works</b>	Implement and monitor ESMP
	Update ESIA (and ESMP) as required
<b>Post-Construction</b>	Environmental Audit

### 6.2.3.2 Moderate Risk Sub-Projects

As per the procedures provided in the table below, Moderate Risk Category sub-projects will require an IEE with a site-based ESMP. The IEE is a review of the reasonably foreseeable effects of a proposed development intervention/activity on the environment. Participation and consultation with local communities are important in identifying the potential impacts and suitable mitigation measures. The major activities involved in carrying out an IEE include the following:

- preparing an environmental baseline within the sub-project influence area, against which impacts of the proposed sub-project would be evaluated;
- Assessment and evaluation of impacts of major project activities on the baseline environment during construction phase and operational phase;
- Identifying mitigation and enhancement measures and environmental code of practice (ECoP);
- Development of site-specific environmental and social management plan (ESMP) including preparation of environmental monitoring plan with responsibility and estimation of budget for implementation of ESMP.

**Table 6-2: Procedures for Moderate Risk Sub-Projects**

Sub-Project Phase	Procedure
<b>Project Identification / Pre-Feasibility</b>	Social and Environmental Screening of sub-project (Annex A and A)
	Consultations with key stakeholders (as per SEP)
	Prepare preliminary ESMP
<b>Feasibility Study / Design</b>	Conduct IEE/ESA and prepare ESMP
	Public consultations (as per SEP)
	Review and modify ECOPs
	Prepare Labour Management Procedure
<b>Detailed Design &amp; Tendering</b>	Ensure Mitigation measures (from ESMP) included in Design
	Ensure ESMP aspects included in Bidding Documents
<b>Construction Works</b>	Implement and monitor ESMP
	Update IEE (and ESMP) as required
<b>Post-Construction</b>	Environmental Audit

### 6.2.3.3 Low Risk Sub-Projects

As per the procedures provided in the table below, for Low Risk Category sub-projects, a site-specific ESMP will be required to ensure enhancements such as greening measures are implemented. The ESMP should clearly lay out: (a) the measures to be taken during both construction and operation phases of a sub-project to eliminate or offset adverse environmental and social impacts, or reduce them to acceptable levels; (b) the actions needed to implement these measures; and (c) a monitoring plan to assess the effectiveness of the mitigation measures employed. The major components of an ESMP include:

- Mitigation and enhancement measures
- Monitoring plan
- Estimation of cost of EMP

### 6.2.3.4 National Environmental Clearance Requirements of the Proposed Investments and Sub-projects

The legislations relevant for environmental assessment for proposed investments and sub-projects are the Environmental Conservation Act 1995 (ECA'95) and the Environmental Conservation Rules 1997 (ECR'97). Department of Environment (DoE), under the Ministry of Environment and Forest (MoEF), is the regulatory body responsible for enforcing ECA'95 and ECR'97.

It is the responsibility of the BHTPA as a proponent to conduct an IEE/EIA of sub-projects, the responsibility to review EIAs for the purpose of issuing Environmental Clearance Certificate rests with DoE. Development works are classified into three categories Green, Orange A, Orange B and Red. Steps to be followed for environmental clearance for different categories are shown in the figure below.

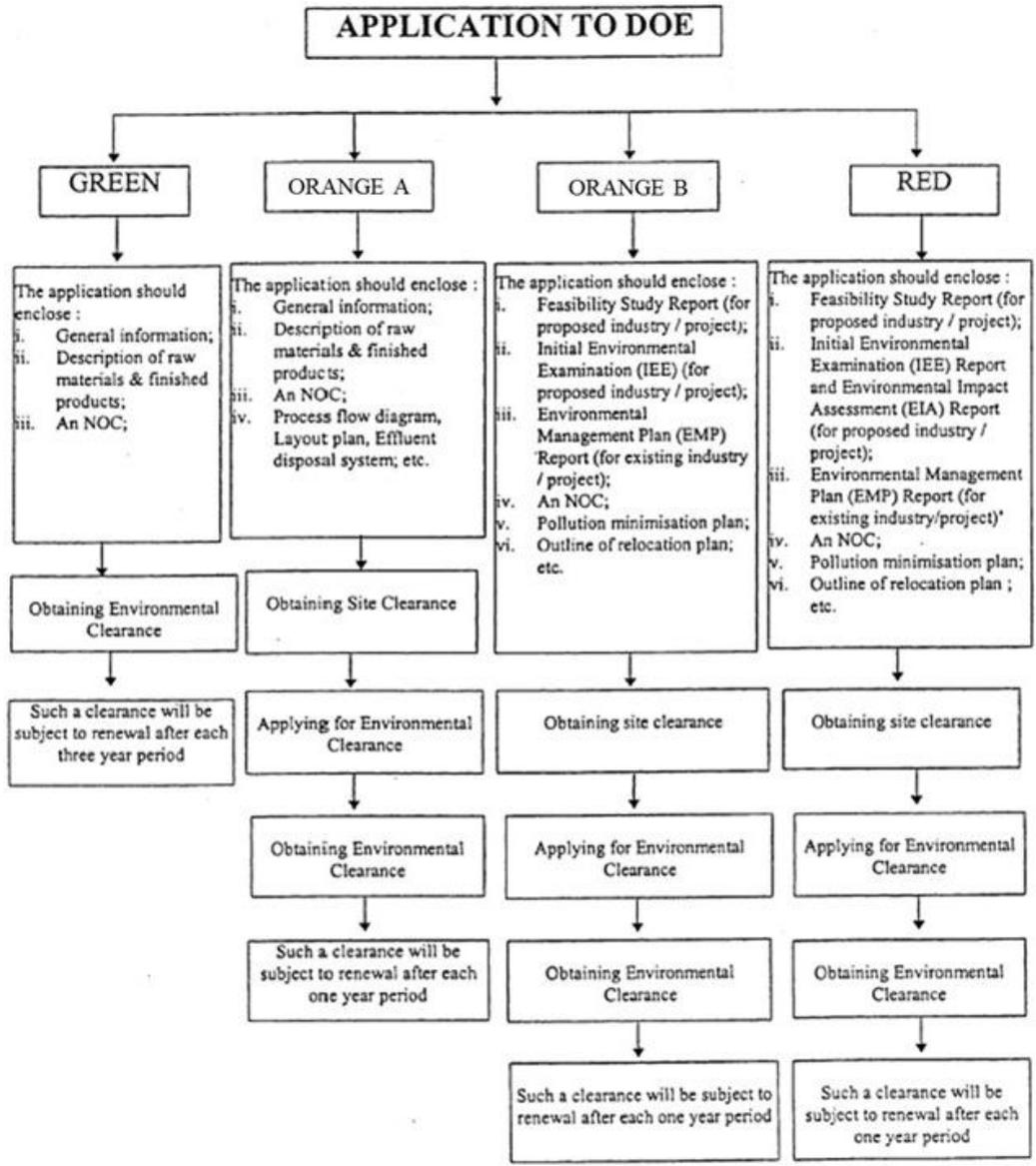


Figure 6-2: DoE Environmental Clearance Steps

## 6.3 Monitoring and Reporting Procedures

### 6.3.1 Monitoring Frequency

Contractor EHS Officers would be on site on a daily basis or otherwise defined in the ESMP's mitigation measures.

ure to inspect active work sites and verify compliance with all applicable mitigation measures for the work phase. PIUEE shall monitor the site on a bi-weekly/monthly basis during civil works, depending on the sub-project scope. More frequent monitoring may be conducted if needed to ensure compliance with the mitigation measures and resolution of any issues that are noted.

## 6.3.2 Compliance Reporting

### 6.3.2.1 Monthly Compliance Reports

Contractor EHS Officers shall prepare and submit a monthly compliance report to supervisory consultant, project participant and the PIUEE and SE to document construction and compliance activities completed during the month, and to track the resolution of any issues that may have occurred. The reports should include the following information for the period:

- Summary of completed construction activities
- Estimate of remaining construction and schedule
- Summary of compliance activities
- Updated list of all EHS incidents that occurred during the project
- Follow up information from any past issues that are still being resolved
- Photographs of project activities related to implementation of ESMP mitigation measures
- Daily compliance checklist each day that work occurs in the field.

### 6.3.2.2 Biannual Compliance Reports

The PIU shall prepare and submit a biannual compliance report to the World Bank to document construction and compliance activities completed during the period and to track the resolution of any issues that may have occurred, for all sub-projects under implementation. The PIU will use daily compliance checklists and monthly compliance reports prepared by the construction contractor to develop the biannual report.

The biannual reports should include the following information for the period:

- Key recommended follow up issues, actions, timeframe and responsibility center.
- An introduction, Reporting period and monitoring locations
- Summary of completed construction activities
- Estimate of remaining construction and schedule
- Summary of compliance activities
- Progress to date in implementing the ESMF, including key aspects monitored: such as waste management, health and safety practices, procurement/storage and use of pesticides including their disposal, dust management, water quality, other environmental incidents and accidents, environmental awareness and training undertaken, etc.
- PIU's and supervisory consultant oversight activities (i.e., site visits)
- Updated list of all EHS incidents that occurred during the project, including attached notices of non-compliance that were issued
- Follow up information from any past issues that are still being resolved

A guideline of Environmental and Social Monitoring Plan is enclosed within **Annex CD**.

A tentative environmental compliance monitoring plan template is provided in **Annex C**. It could be used as a guideline to prepare the sub-project specific monitoring plan. However, this attachment is not indicating the limitation of work rather it can be modified due to project circumstances and depends on the sub-project specific activities. If any changes are needed it would be done by the concern of ES of BHTPA and WB.

## CHAPTER 7. STAKEHOLDER ENGAGEMENT, GRIEVANCE MECHANISMS AND DISCLOSURE

### 7.1 Introduction

Stakeholder refers to individuals or groups who are affected or likely to be affected by the project and the term “stakeholder engagement” refers to a way to describe the process of engagement between a project developer and those potentially affected by the project or way of supporting the implementation. Stakeholder engagement can cover a range of activities and approaches and those are; consultation, engagement, external relations, information disclosure and dissemination, community participation etc.

As a part of updating ESA for the Incubator project consultation, focus group discussions (FGDs) and key informant interviews (KIIs) will need to be carried out in the project influence area to seek opinion and suggestion of the stakeholders through applying the provisions of **ESS-10** of the **Environmental and Social Framework** of the World Bank.

### 7.2 Stakeholder Identification and Analysis

During preparation of the ESA and ESMF under the present study, all the stakeholders will have been primarily synthesized into two categories that have been identified as:

- Project-affected parties: those who are or likely to be affected by the project, and
- Other interested parties: who may have an interest in the project and who could influence the opinions of affected parties either positively or negatively, or affect the implementation process or the sustainability of the project’s outcomes

#### 7.2.1 Project-affected parties

The Incubation area will fully be occupied by the University area and all other physical works will take place there. Therefore, no one will be affected by the project interventions within the territory of the university area.

#### 7.2.2 Other interested parties

The projects’ stakeholders including university authority, campus students and residents, academic and administrative officials, particular faculty/department/institute where it will be established, etc. will be impacted during construction of the project directly or indirectly due to labor influx and project construction/renovation activities.

### 7.3 Information Disclosure and Consultation

A combination of mixed methods of information disclosure and consultation process will be adopted at this stage of ESA preparation. The methods used in the consultation process will be: (i) Key Informants Interview (KII), (ii) Public Consultation, (iii) Focus Group Discussion (FGDs) and (iv) Walk in Interview during Survey. Consultation and information disclosure will be held in the area of influence. In all occasions the date, time and venue of the consultation will be decided by the stakeholders keeping in view their prior engagement and availability. Group discussion with various groups in the project influence area will be conducted in the public places convenient to them while KIIs will be done by visiting the offices/place of the key informants.

### 7.3.1 Consultation and Participation

Three consultation meetings will be held at the university area. Possible project affected parties/ interested parties will be consulted through focus group discussions and officials from relevant university authority will be consulted as key informants. During consultation with the people in groups or individually, they will be briefed about the project including potential benefits, potential positive and adverse impacts and mitigation measures as well. People will be asked to raise some issues related to the probable impacts on them considering other Incubation centers/ similar establishments in the country. They will also be asked to suggest/demand some mitigation measures for their livelihoods and sustainable development.

## 7.4 Grievance Redress Mechanism

### 7.4.1 Grievance Mechanism Structure/Architecture

Grievances in the project may range from effect on the society and the local community due to construction related activities or negative effects on livelihood of project-affected people. Considering the overall need for the total project period, BHTPA intends to establish a GRM to address complaints and grievances starting from Project Implementation Level as there is not likely to be rekonable adverse effect on the community. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons resorting to expensive, time-consuming legal actions. The mechanism will, however, not bar an aggrieved person to go to the courts of law.

The purpose of the GRM is to **record and address any complaint that may arise during the life cycle of the project period effectively and efficiently**. The GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (PAPs) and the complainants. The GRM works within existing social management & resettlement frameworks, providing an additional opportunity to resolve grievances at the local, project, IT/ITeS level operations and at the apex, BHTPA level. Necessary sign posting/bill board would be placed at the central places/places where people gather for sharing detailed information of the GRCs at every level. The structure of Grievance Mechanism chain is as follows:

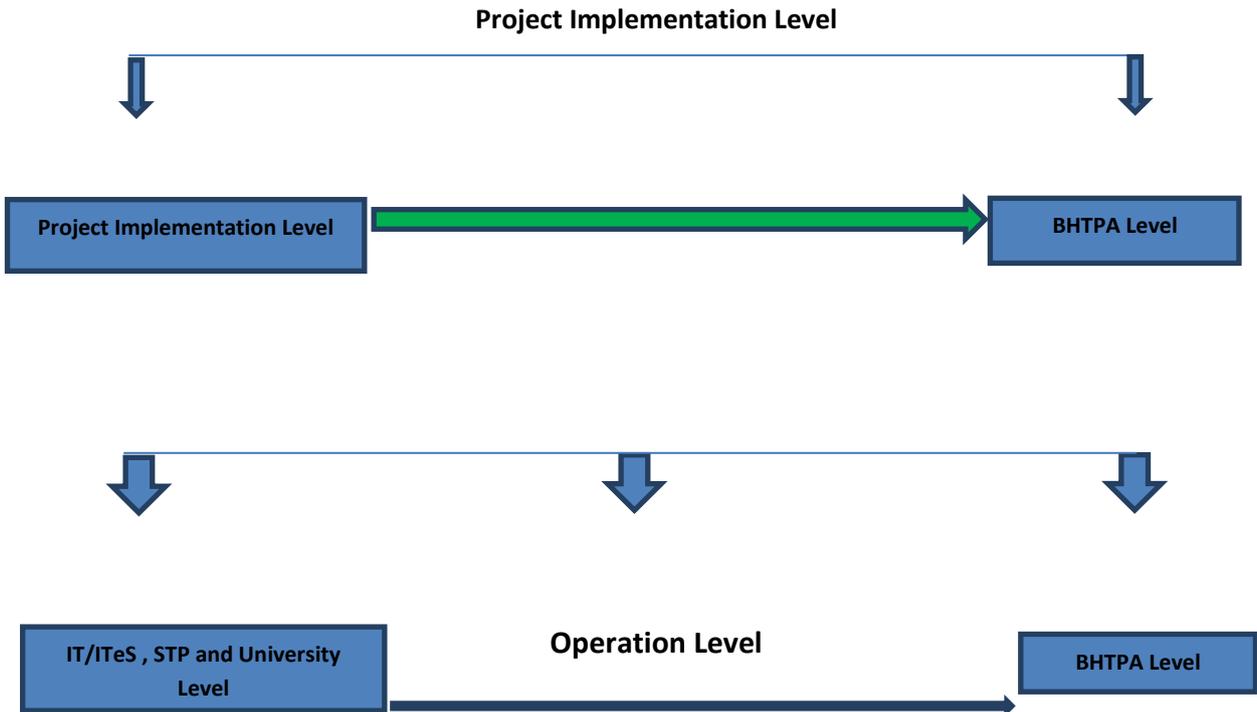


Figure 7-1: The structure of Grievance Mechanism

### Project Implementation Level Grievance Redress Mechanism

The objective of the project implementation level GRM is to bring the GRM closer to PAPs/ workers of the project in its implementation stage. All effort shall be made to resolve issues at the first instance. The Social Specialist at the project level shall carry out the following as regard to redressing grievances:

- Hear the grievances of the PAPs/staffs and workers, and provide an early and mutually satisfactory solution to those;
- Immediately bring to the notice of the Project unit or Social Standards Officer any serious matter that may have arisen/complaint received;
- Inform the aggrieved parties about the progress of actions of their grievances and decisions of the Project unit/Industry level.

The project Implementation level GRM shall have the following Grievance Redress Committee (GRC) members:

- Project Social Specialist (Convenor) - BHTPA
- An elected member of the DNCC North Zone 5/WardCommissioner, Ward No. 26
- A member of the Bazar Committee/Workers Welfare Committee at Karwan Bazar
- A Member of the PAPs/workers of the project
- Local NGO working on Labor and Gender related Issue
- Social/ Resettlement Specialist/ HR Manager (Member Secretary)

The project Implementation level GRC shall resolve or reach a decision within **fifteen (15) days** from the date the complaint is received. The chairperson of the GRC shall communicate the committee's decision to the aggrieved PAPs in writing and maintain a record of all decisions related to each case.

#### 7.4.2 IT/ITeS, STP and University Level Grievance Redress Mechanism during Operation Stage

The objective of IT/ITeS, STP and University level GRM is to oversee the GRM of the IT/ITeS at the operation stage and assist the Industries/Entrepreneurs in addressing the grievances immediately upon receipt of a complaint. When a grievance could not be effectively addressed and mitigated at the Industry/Entrepreneur level, it would be forwarded to the BHTPA level for necessary action. All effort shall be made to resolve issues at the earliest. Appropriate representative of the Industry along with HR Manager at the operational level

The IT/ITeS, STP and University level GRM shall have the following Grievance Redress Committee (GRC) members:

- Director Administration of the Industry/STP/Incharge of Incubator at the University as Convener
- Representative of the staff or workers of the Industry/STP/Incubator including a female staff/worker
- Project Social Specialist (Convener) - BHTPA
- Local NGO working on Labor and Gender related Issue
- HR Manager Administration of IT/ITeS/STP and a senior administrative staff at the University (Member Secretary)

The IT/ITeS, STP and University level GRC shall reach a decision **within fifteen (15) days** from the date the complaint is received. The chairperson of the GRC shall communicate the committee's decision to the aggrieved ones in writing and maintain a record of all decisions related to each case.

#### 7.4.3 BHTPA Level Grievance Redress Mechanism

A committee of knowledgeable persons, experienced in the subject area, shall be constituted at the BHTPA to handle complaints that have not been addressed or resolved at the Project implementation and operational level. The BHTPA level GRM shall be comprised of the following members:

- General Manager, BHTPA (Convener)
- Legal Specialist, Member
- Social Specialist, Member
- Environmental Specialist-Member
- Ward Commissioner, DNCC North Zone 5 (on behalf of PAPs in Project Implementation stage)/Director Administration of the during the Operational Level - Member
- Chief Law Officer of BHTPA – Member
- BHTPA Manager Administration
- Director Administration of the IT/ITeS/STP firm/In charge of Incubator at the University
- Manager Administration-BHTPA - Member Secretary

The BHTPA level Grievance redress committee shall do everything possible to hear and determine the issues **within 15 (fifteen) days** from the date the case has been transferred to it from the Project and

IT/ITeS GRC. To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints, the reasons that led to acceptance or rejection of the particular cases, and the decision agreed with the complainants. BHTPA will keep records of all resolved and unresolved complaints and grievances and make them available for review as and when asked for by the World Bank and other interested persons/entities.

The chairperson of the GRC shall communicate the outcome to the aggrieved PAP(s)/staffs in writing. The GRC shall maintain a record of all outcomes related to each case. Should measures taken by the BHTPA fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the court, and the court's decision will be final.

## 7.5 Grievance Mechanism Intake Channels

Information about the GRM will be publicized as part of the initial disclosure consultations in the participating Upazila, union and villages. 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 BHTPA website (<http://www.bhtpa.gov.bd>). The overall process for the GRM will include six steps and described below. This builds on the way grievances are typically managed.

- **Step 1: Uptake.** Project stakeholders will be able to provide feedback and report complaints through several channels: in person at 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 fifteen (15) 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 then developing a proposed resolution, which could include changes of decisions concerning eligibility for compensation, additional compensation or assistance, changes in the program itself, other actions, or no actions. Depending on the nature of the complaint, the process can include site visits, document reviews, a meeting with the complainant (if known and willing to engage), and meetings with others (both those associated with the project and outside) who may have knowledge or can otherwise help resolve the issue. 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. It is expected that redress to a complaint can be made within 30 days from the receipt of the complaint.
- Step 5: Monitoring and evaluation.** Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. The Social Development Specialist will be responsible for consolidating, monitoring, and reporting on complaints, enquiries and other feedback that have been received, resolved, or pending. 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.

**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. Whenever possible, complainants should be informed of the proposed resolution in person. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the World Bank, as described below, or through avenues afforded by the Bangladesh legal system. 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.

## 7.6 Grievance Registry, Referral, Resolution and Appeals Process

BHTPA would adopt the following procedures:

The GRC at the Community level will establish a simple computerized system to record the complaints; information on the complainants and perpetrators with names of the enterprises they are employed in; acceptance/rejection of the complaints by CGRC and the reasons thereof. If the decision made at this level is not acceptable to the aggrieved person, GRC will refer to the project level /to BHTPA during implementation level. At the operation level of IT/ITeS , If they too fail to solve the problem, it would be referred to the BHTPA Headquarters with details of the complaint and minutes of the hearings the earlier level. BHTPA will review the case and send its decision within fifteen days from the receipt of the complaint or earlier. However, if an aggrieved person is dissatisfied with the GRM, he/she may lodge complain following the law of the land. **An example of a grievance registration form and Typical grievance resolution process of PRIDE project is given at Annex F.**

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 gender-based violence<sup>1</sup>. 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. For further details, please refer to the GBV action plan at <https://www.worldbank.org/en/news/press-release/2017/11/08/new-action-plan-addresses-gender-based-violence-in-world-bank-operations>

## 7.7 GRM Monitoring and Reporting

Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Project Director of PRIDE project. To ensure management oversight of grievance handling, the Internal team will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

## 7.8 GRM contact information - BHTPA

Information on the project and future stakeholder engagement programs will be available on the project's website and will be posted on information boards in the project office, villages, Union Parishad office, Upazila Office crossed by the line. Information can also be obtained from BHTPA offices. The point of contact regarding the stakeholder engagement program at BHTPA is given below:

<sup>1</sup> The World Bank (2018): Good Practice Note Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works. <http://documents.worldbank.org/curated/en/399881538336159607/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Gender-based-Violence-English.pdf>

Description	Contact details
Company:	Bangladesh High-Tech Park Authority
To:	Project Director
Address:	Bangladesh Hi-Tech Park Authority, ICT Tower (9th Floor), E-14/X, Agargaon, Dhaka-1207
E-mail:	<a href="mailto:info@bhtpa.gov.bd">info@bhtpa.gov.bd</a>
Website:	<a href="http://www.bhtpa.gov.bd">www.bhtpa.gov.bd</a>
Telephone:	Phone: +88-02- 8181736 (Ext-423)

## CHAPTER 8. INSTITUTIONALFRAMEWORK

### 8.1 Institutions and Roles in Project Implementation

The key institutions relevant for ESMF implementation are shown in the below figure. Reporting, instructions, liaison/consultation and advice/inspection channels are also shown. PMU/PMC of the project has the most important role for ESMF implementation and updating.

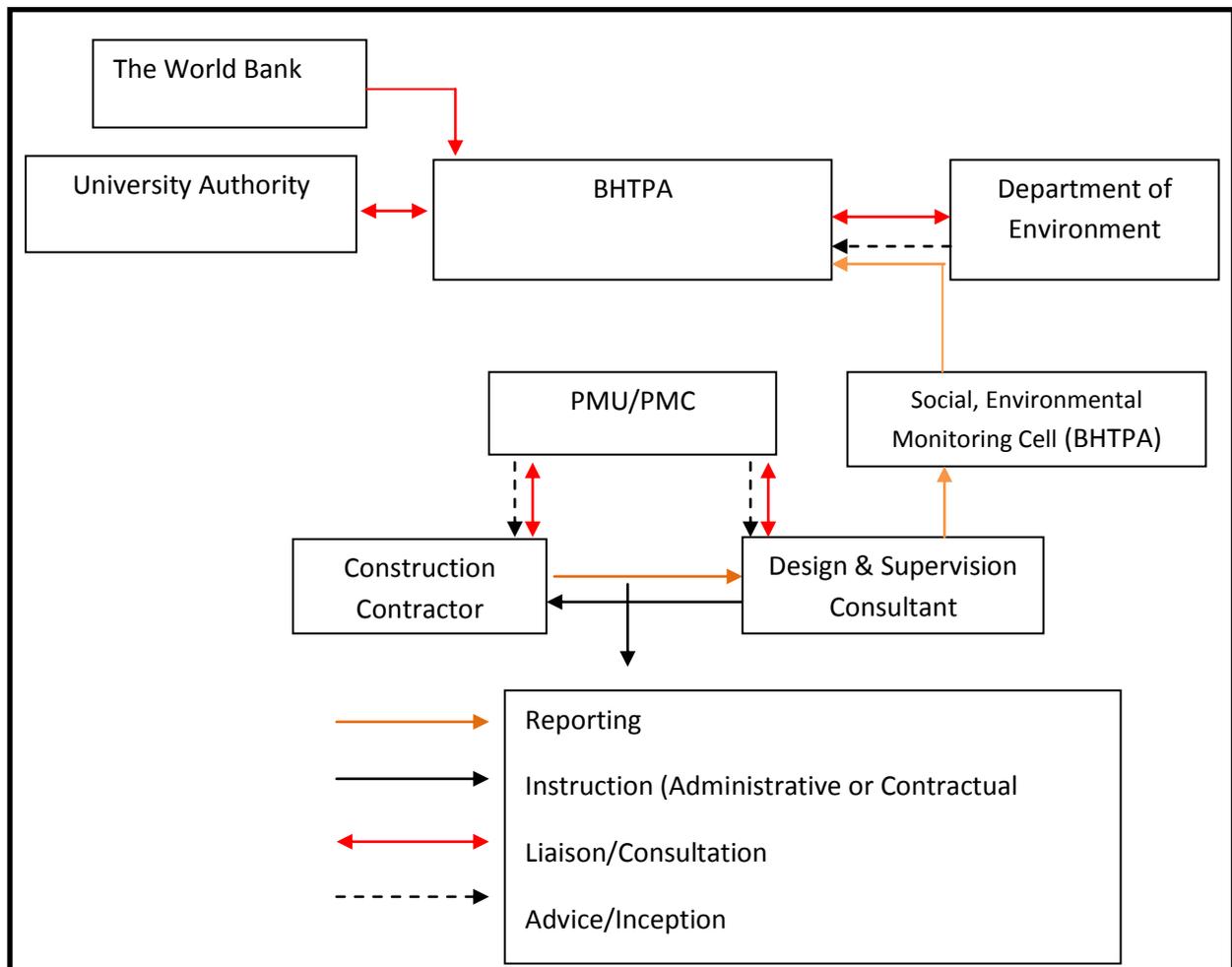


Figure 8-1: Key Institutions Relevant for ESMF Implementation

## 8.2 Other Relevant Institutions Related to Environmental and Social Management

The institutional framework for the management of environment control is complex and number of Government agencies are involved herewith. Among them the key responsible Government institutions are Department of Environment (DoE). The table below presents a summary of key responsibilities of major government institutions who are involved in different capacities for environmental protection and compliance.

**Table 8-1: Institutional Responsibilities, Environmental Protection and Compliance**

Institution	Responsibilities related to environmental protection and compliance
Department of Environment (DoE), Ministry of Environment, Forest and Climate Change	<ul style="list-style-type: none"> <li>• Conserve environment and improve environmental standards;</li> <li>• Control, mitigate and prevent environmental pollution;</li> <li>• Undertake safety measures and determination of remedial measures to prevent environmental degradation and pollution;</li> <li>• Set 'best practice based' water quality standards for inland surface water uses and discharge;</li> <li>• Routine monitoring of water quality to prevent pollution in water bodies;</li> <li>• Define environmental impact assessment (EIA) procedures</li> <li>• Issue Environment Clearance Certificate (ECC) and controlling, preventing and regulating industrial pollution effecting environment;</li> <li>• Declare Ecologically Critical Area (ECA) and protect degraded ecosystems;</li> <li>• Conduct inquiries on pollution of the environment and rendering direction, guidance and assistance to any other authority or organization regarding those matters;</li> <li>• Providing technical input to various Government committees;</li> <li>• Setting forth further regulations and guidelines for regulating activities affecting the environment;</li> </ul>

## 8.3 Roles and Responsibilities of Key Organizations

**Table 8-2: Roles and Responsibilities of Key Organizations**

SN	Organization	Responsibility
1.	BHTPA	<ul style="list-style-type: none"> <li>• Prepare and implement the ESMF and submit for Bank approval</li> <li>• Disclose the ESMF on BHTPA PIU website.</li> <li>• Prepare ESMPs according to ESMF</li> <li>• Perform the quality control and review of ESMPs.</li> <li>• Perform inspections of the implementation of ESMPs, make</li> </ul>

SN	Organization	Responsibility
		<p>recommendations and decide whether additional measures are needed.</p> <ul style="list-style-type: none"> <li>• In case of non-compliance, ensure that the agreement with beneficiaries and procurement eliminates the noncompliance and inform the WB about the noncompliance and follow up.</li> <li>• Prepare, update and implement a Stakeholder Engagement Plan (SEP) that considers vulnerable groups in addition to paying attention to the gender aspect of the Project.</li> <li>• Hold consultation meetings and prepare and distribute leaflets or other informative documents to inform communities.</li> <li>• Set up a multi-level GRM, monitor and address grievances related to the project under specified timelines.</li> </ul>
2.	World Bank	<ul style="list-style-type: none"> <li>• Review, approve and disclose ESMF on WB's official website.</li> <li>• Review and approve labor management procedures.</li> <li>• Conduct implementation support and supervision missions in order to ensure that the Project is in compliance with WB ESF requirements and standards.</li> </ul>
3.	Construction Contractor	<ul style="list-style-type: none"> <li>• The contractor shall develop site specific ESMP before construction, as part of their method statement and submit to PMU for reviewing and approval;</li> <li>• The contractor has to submit a monthly report on safeguard issues, mitigation, and results throughout the construction period. In case of unexpected problem, the contractor will consult PMU and PMC;</li> <li>• Ensure that the construction work will comply with the approved EIA/EMP and the site EMP;</li> <li>• Control and minimize environmental impacts;</li> <li>• Ensure that all staff and workers understand the procedure and their tasks in the environmental management program;</li> <li>• Ensure environmental hygiene.</li> </ul>
4.	Project management Unit (PMU)	<p>In order to effectively manage ESMP implementation, an ESMP management team will be established and made operational after awarding the contract to contractor. Project Director will be the head of team and will be assisted by the PMC.</p>
5.	Project Management Consultants (PMC)	<ul style="list-style-type: none"> <li>• Responsible for monitoring the contractor's activities and to ensure adequate implementation of the ESMP by contractor.</li> <li>• Providing guidance to the PMU regarding any environmental and social issues which may arise during pre-construction and construction phase.</li> <li>• Keep track of contractor's day to day activities, their commitment for implementation of ESMP, quality of work, adherence to safety guidelines and method statements.</li> <li>• Review the Environment Management Action Plan (EMAP) submitted by contractor and should check adequacy as per the ESMP for this project. This EMAP should be amendable and can be updated time to time by PMC</li> <li>• Evaluate Safety, Health and Environmental (SHE) plan covering various construction activities, health of workers/ laborers to be submitted by</li> </ul>

SN	Organization	Responsibility
		contractor for each activity. This plan should include evacuation plan, emergency management & response plan <ul style="list-style-type: none"> <li>• Ensure that all construction and site vehicles should abide by the latest emission norms of the country.</li> <li>• Monitor that all workers &amp; labor of contractor should have valid ID cards to assess the site.</li> <li>• Monitor that adequate safety trainings are being given to the workers, adequate mock drills are conducted at site by contractor, availability of emergency evacuation plan, emergency assembly area, availability of certified first aid trainer at all the construction site</li> <li>• Recommend to the PMU to take punitive action in non-compliance of ESMP &amp; SHE Plan</li> </ul>
6.	Social, Environmental & Communication Cell (SEC)	They will be given the responsibility to independently monitor the overall performance of environmental management of the project, including compliance with relevant GoB and WB regulations and the provision of the environmental and social management (ESMF) developed for the project. As a part of the monitoring, they will prepare a comparison of monitoring outcomes carried out, so that lessons learned, and best practices could be replicated. They will prepare the Compliance Report and submit to the BHTPA authority.
7.	University Authority	<ul style="list-style-type: none"> <li>• Provide proper site-specific information in the design phase</li> <li>• Suggest/recommend in case of project design</li> <li>• Protect the university rules and laws concerned to such constructions</li> <li>• Select representative as a liaison personal</li> <li>• Coordinate with the project authority in implementation phase</li> <li>• Make PIU aware of the issues during working phase and work for solving</li> <li>• Participate in GRM process for the affected groups</li> <li>• Ensure the academic environment is not hampered due the construction works</li> </ul>

#### 8.4 Institutional Setting and Implementation Arrangement

BHTPA will have a **Social, Environmental and Communication Cell (SEC)** which will coordinate implementation of the ESMF. BHTPA will appoint a PMC for monitoring the contractor activities and implementation of ESMF. In the institutional arrangement procedure, Project Director, and Team Leader/Deputy Team Leader will be directly involved. The PD and DPD will be supported by Environmental Safeguard Specialist and Social Management Specialist. Under PMU, there will be relevant officials and consultants to support the PD. The SEC and PMU will submit monthly and quarterly progress reports on Environmental and Social Compliances to GM (P&D). After reviewing it will be sent to World Bank.

##### Formation of Social, Environmental and Communication cell

An assessment of BHTPA shows that there is no defined institutional setup to supervise the safeguard activities under the project. There is no dedicated social and environmental cell or unit in BHTPA for monitoring and managing social, environmental and health and safety risks for the development projects. Therefore, a Social, Environmental and Communication cell is therefore recommended. This cell will work independently to monitor and supervise the ESMF for the project. The PMC will work under the PMU. The PMC will need to have qualified safeguard specialists who will review the reports from the Design and Supervision Consultants and the Contractors on the implementation of the ESMF. The Design and Supervision Consultant will work in the zone to monitor the implementation of the ESMF by the contractor and report to the PMU.

## **8.5 Action Plan to Strengthen Staffing, Capacity, Systems and Implementation**

During the project period, the Safeguard Consultants will have to be deployed under both PMU and PIU 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 Safeguard Issues. The ESMF document 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. If the Consultants, ES & SS, do not feel confident on their subjects, the ESIA consultants will initiate training for the BHTPA officials as a TOT course on safeguard issues. Later on, the BHTPA officials and Consultants will train up the Contractors' people on safeguard compliances.

On-the-job training is essential for the capacity building of Contractors' people (Supervisors and Labor Supervisors of Contractor). BHTPA, with support of third-party resources as needed (independent experts, NGOs, etc.), will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts of the project.

## **8.6 Assessment of Capacity of BHTPA**

A careful assessment of BHTPA has been made which shows that there is no defined institutional setup to supervise the safeguard activities under the project. There is no dedicated social and environmental cell or unit in BHTPA for monitoring and managing social, environmental and health and safety risks for the development projects, except the Individual Environmental and Social Consultants at head Office. 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 safeguard 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.

### **8.6.1 Action Plan to Strengthen Staffing, Capacity, Systems and Implementation**

During the project period, the Safeguard 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 Safeguard Issues. The ESMP document 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. If the Consultants, ES & SS, do not feel confident on their subjects, the ESIA consultants will initiate training for the BHTPA officials as a TOT course on safeguard issues. Later on, the BHTPA officials and Consultants will train up the Contractors' people on safeguard compliances.

On-the-job training is essential for the capacity building of Contractors' people (Supervisors and Labour Supervisors of Contractor). BHTPA with support of third-party resources as needed (independent experts, NGOs, etc. will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts of the project.

**Table 8-3: Capacity development support (training)**

<b>Training to be provided</b>	<b>Targeted Groups and Timeframe</b>	<b>Timeline of Trainings</b>
<b>Environmental and Social Framework:</b> Training on ESF and the 10 ESSs including preparation of ESMP	Personnel directly related with project at BHTPA head office and Filed office (if available)	Prior to Project effectiveness for 7 days
<b>Occupational Health and Safety Module:</b> Personal protection equipment Workplace risk management Prevention of accidents at work sites Health and safety rules Solid and liquid waste management Hazardous waste management e.g. fuelling of vehicles Preparedness and response to emergency situations Awareness campaign on HIV/AIDS	<i>Local Officials of BHTPA, PMC, Locally active NGOs, Contractors</i>	Prior to the Project effectiveness  4 sessions with each comprising 2 days
<b>Labour and Working Conditions:</b> Terms and conditions of employment according to national working laws and regulations Contractor and sub-contractor codes of conduct Worker's organizations Child labour and minimum age employment rules	<i>Local officials of BHTPA, Contractors Health Safety Officer, Labour Sardars (Leaders)</i>	Prior to the Project effectiveness 4 sessions with each comprising 2 days (can be merged with OHS module)
<b>Grievance Redress Mechanism Module, design and production of a training module addressing the following aspects:</b> <ul style="list-style-type: none"> <li>• Registration and processing procedure</li> <li>• Grievance redress procedure</li> <li>• Documenting and processing grievances</li> <li>• Use of the procedure by different stakeholders</li> </ul>	ES, SDS, GS, Local Governments, Civil Society, Local NGOs working with host population and, Contractors	Prior to Project effectiveness and thereafter once every six months Each session for 1 day
<b>Construction Waste Management:</b> 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 Basic knowledge about handling procedures and risk management Using protective and safety equipment Information about the waste sorting process Safe procedures for managing waste in dumps Hazardous waste management Refuelling procedure Spillage of soil management	ES, EHS, SDS, Contractors	Prior to Project effectiveness and thereafter every three months  Each session for 1 day
<b>GBV Risk Module</b> Raising awareness and measures to prevent and mitigate GBV risks The topics, activities and targeted groups will be developed in the GBV Action Plan including GBV-specific GRM	BHTPA Local officials, Contractors Health Safety Officer, Labour Sardars (Leaders), Local NGOs	Prior to Project effectiveness and thereafter every six months  Each session for 2 days

Training to be provided	Targeted Groups and Timeframe	Timeline of Trainings

**Table 8-4: Capacity Development Support (Training)**

Training to be provided	Targeted Groups and Timeframe	Timeline of Trainings
<p><b>Environmental and Social Framework:</b></p> <p>Training on ESF and the 10 ESSs including preparation of ESMF, ESIA, IEE and ESMP</p>	<p>Personnel directly related with project at BHTPA head office and Field office (if available)</p>	<p>Prior to Project effectiveness for 7 days</p>
<p><b>Occupational Health and Safety Module:</b></p> <p>Personal protection equipment Workplace risk management, Prevention of accidents at work sites, Health and safety rules, Solid and liquid waste management, Awareness campaign on HIV/AIDS</p>	<p>Local Officials of BHTPA, PMC, Locally active NGOs, Contractors</p>	<p>Prior to the Project effectiveness; 4 sessions with each comprising 2 days</p>
<p><b>Labor and Working Conditions:</b></p> <p>Terms and conditions of employment according to national working laws and regulations , Contractor and sub-contractor codes of conduct, Worker’s organizations, Child labor and minimum age employment rules</p>	<p>Local officials of BHTPA, Contractors Health Safety Officer, Labor Sardars (Leaders)</p>	<p>Prior to the Project effectiveness; 4 sessions with each comprising 2 days (can be merged with OHS module)</p>
<p><b>Grievance Redress Mechanism Module, design and production of a training module addressing the following aspects:</b></p> <p>Registration and processing procedure, Grievance redress procedure, Documenting and processing grievances, Use of the procedure by different stakeholders</p>	<p>ES, SDS, GS, Local Governments, Civil Society, Local NGOs working with host population and, Contractors</p>	<p>Prior to Project effectiveness and thereafter once every six months; Each session for 1 day</p>
<p><b>GBV Risk Module</b></p> <p>Raising awareness and measures to prevent and mitigate GBV risks, the topics, activities and targeted groups will</p>	<p>BHTPA Local officials, Contractors Health Safety Officer, Labor Sardars (Leaders), Local NGOs</p>	<p>Prior to Project effectiveness and thereafter every six months; Each session for 2 days</p>

<b>Training to be provided</b>	<b>Targeted Groups and Timeframe</b>	<b>Timeline of Trainings</b>
be developed in the GBV Action Plan including GBV-specific GRM		

## ANNEXES

### Annex A: Sample Environmental Screening Form

Project Name

Project Details in Brief:

Project location/s:

ProjectDetails		
Sl.no	Components	Details
1	Project components	
2	DetailsofAlignment/Components (main componentsincluding construction activities)	
3	Location ofthe Project Sites & CurrentLand use(Provide information forallsites involvedin theproject), anyhistoric land use (related to heritage,orcontamination)  Site SurveyNo:/s (with ownership), Geographicalco-ordinatesof the site	

#### Proposed Resource Use

Resource Use				
Sl.no	Proposed Resources	Area/ Quantity	Unit	Details
(i).	Land Area proposed tobe used: Location wise(insqkm/sqm)			
(ii).	Estimated energy consumption for the projectactivities–Sourcewise			
(iii).	Estimatedusageofwaterquantityforthe project: Ground WaterandSurfacewater?			

#### Baseline EnvironmentalConditions

Sl.no	EnvironmentalAspects	Yes	No	Details

Sl.no	EnvironmentalAspects	Yes	No	Details
1	Is the project site located on or adjacent to any of the following (Provide information for all sites and alignment of the project components/subcomponents, associated activities; mention distance to these features in meters/kilometres)			
i)	Critically Vulnerable Coastal Areas, Eco-sensitive Areas			
ii)	Cultural Heritage site, Protected monuments			
iii)	Natural Forests/Protected Areas  Is the project in an eco-sensitive or adjoining an eco-sensitive area?  If Yes, provide details.			
iv)	Any other Wetlands/Mangrove/Estuarine Region?			
v)	Any Natural Habitat areas, areas with natural features?			
vi)	Any other Sensitive Environmental Components?			
vii)	Any Residences, schools, hospitals, sensitive receptors?			
viii)	Any culturally – socially important paths, areas/religious occupancies, burial grounds, tourist or pilgrim congregation areas, borders, etc?			
ix)	Any Drinking water source, upstream and downstream uses of rivers, etc?			
x)	Any Low-lying areas prone to flooding/areas of Tidal Influence?			
xi)	Any areas affected by other disasters?			
2	Is the site in Critical / Over Exploited condition?			
3	Is the area disaster-prone? If yes; list all			

Sl.no	EnvironmentalAspects	Yes	No	Details
	disasterzone categories applicable			
4	Describethesoiland vegetation onsite	n/a	n/a	
5	Isthesiteareaandconditionsuitablefor proposeddevelopment?			
6	Describe existingpollutionordegradation in thesite(s)	n/a	n/a	
7	Anyotherremarkon baseline condition?			

**Anticipated Environmental Impacts: Impacts on Land, Geology and Soils**

Sl.no	Impacts	Yes/ May create	No	Details
8.	Willthe proposed projectcausethefollowingon Land/Soil?			
i)	ImpactonSurrounding Environmental Conditionsincluding OccupationonLow lyinglands/flood plains			
ii)	SubstantialremovalofTopSoil(mention areainsqm)			
iii)	Any degradation of land / eco-systems expecteddueto the project?			
iv)	Loss or impacts on Cultural/heritage properties			
v)	Doestheprojectactivityinvolvecutting and filling/blastingetc?			
vi)	Will the projectcause physical changes in theprojectarea (e.g., changes to the topography)dueto earth filling, excavation, earthwork oranyotheractivity?			
vii)	Will the project involve anyquarrying/ miningetc?			
viii)	Willtheproject/anyofitscomponent contaminate orpollutetheLand?			

**Impacts on Water Environment**

Sl.no	Impacts	Yes/May Create	No	Details
9	Will the subproject or its components cause any of the following impact on Water sources (Quantity or Quality):			
i)	Will the activities have proposed at the site(s) impact water quality (surface or underground) and water resource availability and use? Will this sub-project involve the dredging of water bodies, sea, canals, etc.			
ii)	Impacts on Water Resources			
iii)	Pollution of Water bodies/ground water nearby or downstream			
iv)	Will the project affect the River /cannel flow pattern, stream pattern or any other irrigation canal?			
v)	Will the project result in stagnation of water flow or pondage or weed growth			

**Impacts on Biodiversity and Host Communities**

Sl.no	Environmental Impacts	Yes/May Create	No	Details
10	Will the subproject or its components cause any of the following impact on Biodiversity or the			

Sl.no	Environmental Impacts	Yes/May Create	No	Details
	e neighborhood			
i)	Will the project necessitates cutting of? Trees/LossofVegetation			
ii)	Will theproject resultinHealth&Safety Risksintheneighborhoodincludingthe release oftoxicgases, accidentrisks			
iii)	Potentialriskofhabitatfragmentation due totheclearingactivities?(e.g.Hindrancet o thelocalbiodiversity likedisturbing the migratorypath ofanimals/birds etc.)			
iv)	PotentialNoise and LightPollution or disturbanceto surrounding habitats/communities			
v)	Potentialdisruptiontocommon property, accessibility,trafficdisruptions,conflicts or disruption to the local community within thesubproject area?			

**Impacts dueto Storage and Wastes:PollutionandHazards**

	Type	Yes	No	Details
11	Willthesubprojectoritscomponentscauseanyimpactduetostorageofmaterials,wastesor pollution due toreleasesduring various projectactivities			
i)	Will the project useorstore dangerous substances(e.g., large quantitiesof hazardous chemicals/ materials like Chlorine,Diesel,Petroleum products;any other?			

	Type	Yes	No	Details
ii)	Will the project produce solid or liquid wastes; including construction/demolition wastes (including dredging, de-weeding wastes, muck/silt, dust); polluted liquids?			
iii)	Will the project cause or increase air pollution or odour nuisance?			
iv)	Will the project generate or increase noise levels which will impact surrounding biodiversity or communities?			
v)	Will the project generate or increase visual blight or light pollution?			
vi)	Will the project cause water pollution? (of water bodies/groundwater)?			
vii)	Will the project involve dangerous construction activities which may be a safety concern to workers/ host communities			
viii)	Is there a potential for release of toxic gases or accident risks (e.g. potential fire outbreaks)			
12	Describe any other features of the project that could influence the ambient environment			

### Suggested Environmental Enhancement Measures

	Enhancement Measures	Yes	No	Details
14	Has the subproject design considered the following enhancement measures?			
i)	Energy conservation measures/energy recovery options incorporated in subproject design			
ii)	Considered waste minimization or waste reuse/recycle options			
iii)	Rainwater harvesting, water recycling and other water resource enhancement measures			

iv)	Considerations for extreme events, drought, flood, other natural disasters			
vi)	NOC for water withdrawal from surface water source			
vii)	Mining Permit (for dredging)			
viii)	NOC for transportation and storage of diesel, oil and lubricants, etc.			
ix)	Others (Mention)			

This Screening sheet must be completed for each of the proposed subproject and forwarded to the Environment Specialist in Respective PMU along with the following enclosures.

**Enclosures:** Provide maps with the geographical location of the project; and an appropriately scaled map clearly showing the project area and project sites with land use, existing buildings, infrastructure, vegetation, adjacent land use, utility lines, access roads and any planned construction, and any other information to describe the project, locations and possible impacts as required.

***Project Categorization and Need for Safeguards Instruments, Oversight***

<b>Project Category</b>	<input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> Substantial <input type="checkbox"/> High
<b>Key Reasons</b>	
<b>Safeguards Instruments Required</b>	<input type="checkbox"/> <b>Detailed ESIA and ESMP</b> <input type="checkbox"/> <b>ESA</b> <input type="checkbox"/> <b>RAP</b> <input type="checkbox"/> <b>Site-specific ESMP</b>

<b>Status</b>	<b>Agency/Official</b>	<b>Name, Signature with Date and Seal</b>
<b>Prepared by</b>	Environmental Specialist	
	Environmental Expert in charge	



<b>Checked and Categorized as (low, moderate, substantial, high)by</b>	PMU	
	Environmental Specialist	
<b>Reviewed&amp;accepted by</b>	PMU	
	Environmental Specialist	

## Annex B: Sample Social Screening Form

Project Name .....

Project location .....

Land Use, Resettlement, and/or Land Acquisition				
Sl.no	Components	Yes	No	Details
1	Does the project involve acquisition of privateland?			
2	Alienation of any type of Government land including that owned by Urban Local Body?			
3	Clearance of encroachment from Government/Local body Land?			
4	Clearance of squatters/hawkers from Government/Local Body Land?			
5	Number of structures, both authorized and/or unauthorized to be acquired/cleared/			
6	Number of households to be displaced?			
7	Village common properties to be alienated Pasture Land (acres) Acquisition / burial ground and others specify?			
8	Existing land uses on and around the project area (e.g., community facilities, agriculture, tourism, private property) will be affected?			
9	Will the project result in construction workers or other people moving into or having access to the area (for a long-time period and in large numbers compared to permanent residents)?			
10	Are financial compensation measures expected to be needed?			

<b>Land Use, Resettlement, and/or Land Acquisition</b>				
<b>Sl.no</b>	<b>Components</b>	<b>Yes</b>	<b>No</b>	<b>Details</b>
<b>Loss of Crops, Fruit Trees, Household Infrastructure and Livelihood</b>				
11	Will the project result in the permanent or temporary loss of the following?			
11.1	Crops?			
11.2	Fruit trees? Specify with numbers			
11.3	Petty Shops			
11.4	Vegetable/Fish/Meat vending			
11.5	Cycle repair shop			
11.6	Garage			
11.7	Tea stalls			
11.8	Grazing			
11.9	Loss of access to forest produce			
11.10	Any others-specify			
<b>Welfare, Employment, and Gender</b>				
12	Is the project likely to provide local employment opportunities, including employment opportunities for women?			
13	Is the project being planned with sufficient attention to local poverty alleviation objectives?			
14	Is the project being designed with sufficient local participation (including the participation of women) in the planning, design,			
<b>Historical, Archaeological, or Cultural Heritage Sites</b>				
15	Historical heritage site(s) require excavation near the same?			
16	Archaeological heritage site(s) require excavation near the same?			
17	Cultural heritage site(s) require excavation near the same?			
18	Graves or sacred locations require excavations near the same?			
<b>Tribal Population/Indigenous People</b>				

<b>Land Use, Resettlement, and/or Land Acquisition</b>				
<b>Sl.no</b>	<b>Components</b>	<b>Yes</b>	<b>No</b>	<b>Details</b>
19	Does this project involve acquisition of any land belonging to Tribal people?			
<b>Beneficiaries</b>				
20	Population proposed to be benefitted by the proposed project	Approx. no.:		
21	No. of Females proposed to be benefitted by the proposed project	Approx. no.:		
22	Vulnerable households/population to be benefitted	Approx. no.:		
23	No. of Families to be benefitted	Approx. no.:		

This Screening sheet must be completed for each of the proposed Project by respective social team and forwarded to the Social Specialist in Respective PMU along with the following enclosures.

**(Enclosures:** Land details for the project sites, location, survey numbers, extent available and required, land use classification, current use of the site, land ownership, alienation/acquisition status, as required along with a certificate giving availability of sites required for the project by the borrower.)

**Project Categorization and Need for Safeguards Instruments, Oversight**

<b>Project Category</b>	<input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> Substantial <input type="checkbox"/> High
<b>Key Reasons</b>	
<b>Safeguards Instruments Required</b>	<input type="checkbox"/> Detailed ESIA and ESMP <input type="checkbox"/> ESA <input type="checkbox"/> RAP <input type="checkbox"/> Site-specific ESMP

<b>Status</b>	<b>Agency/Official</b>	<b>Name, Signature with Date and Seal</b>
<b>Prepared by</b>	Social Specialist	
	Social Expert/in-charge	
<b>Checked and Categorized as (low, moderate, substantial, high) by</b>	PMU	
	Social Specialist	
<b>Reviewed &amp; accepted by</b>	NPMU	
	Social Specialist	

## Annex C: Outline of Environmental Compliance Monitoring Plan

<b>What parameter is to be monitored?</b>	<b>Where is the parameter to be monitored?</b>	<b>How is the parameter to be monitored?</b>	<b>When is the parameter to be monitored (frequency of measurement)?</b>	<b>Why is the parameter to be monitored?</b>	<b>Responsibility</b>	
					<b>Implementation</b>	<b>Monitoring</b>

## Annex D: Guidelines for ESMP

An Environmental and Social Management Plan (ESMP) is a document that details:

- (a) the measures to be taken during the pre-construction, construction and operation phases of a project to mitigate adverse environmental and social impacts and/or enhance the project benefits
- (b) who is responsible for carrying out the measures and supervision responsibilities
- (c) monitoring and reporting activities required to ensure that the measures are implemented and working properly.
- (d) allocation of resources including capacity building and training requirements
- (e) contingency plans

The following table provides more guidelines for preparing an ESMP.

ESMP Component	Guideline
Summary of impacts	The predicted adverse environmental and social impacts for which mitigation is required should be identified and briefly summarized.
Description of mitigation measures	Each mitigation measure should be briefly described with reference to the impact to which it relates and the conditions under which it is required.
Description of monitoring programme	The monitoring program should clearly indicate the linkages between impacts identified, measurement indicators, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions.
Institutional arrangements	Responsibilities for mitigation and monitoring should be clearly defined, including arrangements for co-ordination between the various actors responsible for mitigation.



**Table 1: Example Environmental and Social Management Plan**

Activities	Environmental and Social Impacts	Suggested Mitigation Measures/ Enhancement Measures/ Environmental Design Considerations	Responsible parties
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**Land Development**

<p>Demolition of existing infrastructure Land cleaning Transportation of debris</p>	<ul style="list-style-type: none"> <li>▪ Physical or social disruption to the existing and nearby communities</li> <li>▪ Soil erosion/ dust pollution/siltation/water pollution/</li> <li>▪ Traffic congestion due to transportation of debris.</li> <li>▪ Borrow pit</li> <li>▪ Over flowing of canal water can cause of flooding</li> </ul>	<ul style="list-style-type: none"> <li>▪ Engage the community members in the construction work</li> <li>▪ Transport/handle debris from toilet in a hygienic manner</li> <li>▪ Placement of construction equipment in a proper place to avoid traffic congestion and compaction of soils.</li> <li>▪ Collection and disposal of construction debris in a designated dumping place.</li> <li>▪ Ensure proper compensation to the PAPs</li> <li>▪ Attempt to avoid the forest area as much as possible</li> <li>▪ Construction labor should be restricted from polluting the source or misusing the source.</li> <li>▪ Alternate arrangements shall be made to all the water users prior to the</li> <li>▪ No borrow pit will be opened without the permission of the supervision consultant.</li> </ul>	<p>Contractor Monitoring by BHTPA</p>
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**Design, Construction, and Operation of Project Interventions**

<ul style="list-style-type: none"> <li>• Incubation</li> </ul>	<ul style="list-style-type: none"> <li>▪ Noise and pollution due to construction</li> <li>▪ The waste from the works during the</li> </ul>	<ul style="list-style-type: none"> <li>▪ Using locally available construction materials</li> <li>▪ Rooftop plantation and gardening may reduce the</li> </ul>	<p>Contractor</p>
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center for official work	<p>construction of building</p> <ul style="list-style-type: none"> <li>▪ Water pollution due to unplanned discharge of domestic wastewater</li> <li>▪ Unplanned disposal of domestic solid waste</li> <li>▪ Drainage congestion/water logging</li> <li>▪ Greater demand of bricks and cement puts pressure on fossil fuel and timber which in turn reduces the forest areas and pollute air</li> </ul>	<p>excess local temperature</p> <ul style="list-style-type: none"> <li>▪ Accommodate a drainage of wastewater</li> <li>▪ Keep an arrangement of shelter during any disaster</li> <li>▪ Consider solar panel for electricity supply</li> <li>▪ Keeping adequate provisions (including fire/emergency exits) for fire safety in accordance with National Building Code</li> <li>▪ Use low solar heat gain coefficient of glass and use of natural light</li> <li>▪ For energy saving daylight-controlled lighting systems and use of LED lighting is preferable</li> </ul>	Monitoring by BHTPA
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Activities	Environmental and Social Impacts	Suggested Mitigation Measures / Enhancement Measures / Environmental Design Considerations	Responsible parties
<ul style="list-style-type: none"> <li>▪ DTW and Pump house</li> </ul>	<ul style="list-style-type: none"> <li>▪ Water logging condition/drainage congestion.</li> <li>▪ Depletion of ground water table through over extraction of water.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Design and construction drains with appropriate outlets</li> <li>▪ Encourage water use efficiency/ demand management through awareness</li> </ul>	<p>Contractor</p> <p>Monitoring by BHTPA</p>
Water Distribution Network	<ul style="list-style-type: none"> <li>▪ Water logging condition/drainage congestion.</li> <li>▪ Air and noise pollution during construction</li> <li>▪ Leakage or failure of distribution network</li> </ul>	<ul style="list-style-type: none"> <li>▪ Design and construction WDN with appropriate slope</li> <li>▪ Ensure proper supervision during laying of pipe</li> <li>▪ Generation less noise during construction</li> </ul>	<p>Contractor</p> <p>Monitoring by BHTPA</p>
<ul style="list-style-type: none"> <li>▪ Drains/ Drainage</li> </ul>	<ul style="list-style-type: none"> <li>▪ Clogging/ stagnation of flow in the storm drain</li> </ul>	<ul style="list-style-type: none"> <li>▪ Designing drain considering the downstream discharge point; adequate slope and x-section; RCC</li> </ul>	Contractor

Activities	Environmental and Social Impacts	Suggested Mitigation Measures / Enhancement Measures / Environmental Design Considerations	Responsible parties
e system	<ul style="list-style-type: none"> <li>▪ Backflow of water through drain (e.g., due to high water level at downstream discharge point, such as Khal/river)</li> <li>▪ Discharge from drain pollute downstream waterbody</li> </ul>	<ul style="list-style-type: none"> <li>cover for drain, where appropriate</li> <li>▪ Not allowing direct connection to drain from toilet</li> </ul>	Monitoring by BHTPA
<ul style="list-style-type: none"> <li>▪ Power Lines</li> </ul>	<ul style="list-style-type: none"> <li>▪ Short circuit and improper electrical connection may cause potential health and safety risk.</li> <li>▪ Connections of line may interrupts the community people since main line will stop during connection</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ensure use of proper PPEs</li> <li>▪ Switch off before electrical connection</li> <li>▪ Inform the local people about the concern prior to work start</li> </ul>	Contractor  Monitoring by BHTPA
<ul style="list-style-type: none"> <li>▪ Solid Waste Management</li> </ul>	<ul style="list-style-type: none"> <li>▪ Uncollected wastes blocked the drainage and sewage system.</li> <li>▪ Air, water and soil pollution during the waste collection</li> <li>▪ Smoke from the open burning of uncollected waste.</li> <li>▪ The loading and unloading of waste at transfer station pollutes the air and soil.</li> <li>▪ Odor from waste disposal site and composting system.</li> <li>▪ Contamination of ground water by leachate.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Encourage 4R (reduce, reuse, recycle, recovery)</li> <li>▪ Encourage composting of organic waste</li> <li>▪ Construct/supply garbage bin and secondary transfer station</li> <li>▪ Adequate distance between waste bin and waterbody.</li> <li>▪ Adequate distance should be maintained between the waste collection point and residence or office space</li> <li>▪ Provision of Plasma gasification</li> <li>▪</li> </ul>	Contractor  Monitoring by BHTPA

Table 2: Typical Impact and Mitigation Measures for ESMF Sub-Projects

Typical Impacts	Typical Mitigation Measures
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Typical Impacts	Typical Mitigation Measures
<ul style="list-style-type: none"> <li>• Physico-chemical environment:                             <ul style="list-style-type: none"> <li>○ Air pollution</li> <li>○ Noise pollution</li> <li>○ Water pollution</li> <li>○ Soil pollution</li> </ul> </li> <li>• Biological environment:                             <ul style="list-style-type: none"> <li>○ Terrestrial and aquatic flora changes</li> <li>○ Terrestrial and aquatic fauna changes</li> </ul> </li> <li>• Socio-economic environment:                             <ul style="list-style-type: none"> <li>○ Occupational Health and Safety issues</li> <li>○ Community impacts</li> <li>○ Labour influx</li> <li>○ Traffic impacts</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Storage sites of construction materials must be covered with shed so that no dust or small, particles from the stored cement, brick, sand or other materials mix into the open air.</li> <li>• When land will be filled or excavated, regular watering on the excavated land would minimize the amount of dust produced from the land.</li> <li>• Water-logging resulting from land filling and excavation must be mitigated.</li> <li>• No runoff from storage areas can be discharged into water bodies.</li> <li>• Tree plantation is required for overall environmental benefits in the area. Compensatory afforestation shall be at the rate of 2 to 4 times of the trees cut. Preferably same varieties of trees as are cut; shall be used for afforestation.</li> <li>• Proposed building should be equipped with amenities of green building infrastructures</li> <li>• Prepare and implement RAP to acquire land (if required)</li> <li>• Prepare an effective traffic management plan</li> <li>• Encourage engagement of PAPs in the development works</li> <li>• Training PAPs for their livelihood restoration</li> </ul>

**Table 3: Example Environmental and Social Monitoring Plan**

Project Stage/ Affected Component	Environmental /social Issue	Parameters to be Monitored	Location	Measurement	Standards/ Guidelines	Frequency	Responsible Agency	
							Implemen- ted by	Supervised by
<b>Construction Phase</b>								

Consultation with affected PAPs	RAP Implementation	Affected PAPs	Affected Households	Monitoring	World Bank	Daily	Assigned Consultant	BHTPA
Employment	Engaging local labour	Associates project worker	Camp site	Consultation with local labour	World Bank and GoB	Weekly	Supervision Engineer &	BHTPA
Dredge materials	Soil and water pollution of the project and surrounding area	Lead (Pb), Cadmium (Cd), Chromium (Cr), Copper (Cu), Zinc (Zn), Manganese (Mn),	Proposed dredging sites	Monitoring	Government of Bangladesh (GoB) and international standard	Before starting the dredging	Contractor	BHTPA
Ambient Air Quality	Dust generation	Dust	Project activity areas and construction workers camp	Visual inspection of all active work areas	Monitoring	Daily	Contractor	BHTPA
	Ambient Air Pollutant	SPM, PM <sub>2.5</sub> , PM <sub>10</sub> , CO, SO <sub>2</sub> , NO <sub>x</sub>	Project site	24-hour	Air quality standard by DOE, Bangladesh	Quarterly	Contractor by Engaging Environmental Firm	BHTPA
Noise	Increase in ambient noise levels	Noise levels in Leq, Leq day, Leq night	Project site	24-hour	Noise Pollution Control Rules (2006)	Quarterly	Contractor by Engaging Environmental Firm	BHTPA
Water Quality	Contamination of surface	Turbidity, pH, DO, Total	Two samples	Monitoring	Surface water quality	Quarterly	Contractor by Engaging	BHTPA

	water	dissolved solids, oil & grease, BOD <sub>5</sub> , COD, NH <sub>3</sub>			standard as per Schedule 3 of ECR 1997		Environmental Firm	
Waste	Liquid waste, Solid Waste	<ul style="list-style-type: none"> <li>• Check storage, transportation, disposal, handling of hazardous waste</li> </ul>	Project Site	Visual inspection of all active work areas	Monitoring	Daily	Contractor	BHTPA
Occupational Health and Safety	Workers Health & Safety	<ul style="list-style-type: none"> <li>• First Aid Box with required tools and medicines;</li> <li>• The heavy construction material to handled and stored safely putting due care on public safety;</li> <li>• Check of personal protective equipment (PPE) for worker at the sites</li> </ul>	Construction area	Visual inspection of all active work areas	Monitoring	Daily	Contractor	BHTPA

Community Health and Safety	Community disturbance and potential safety hazard due to road traffic	Accidents, incidents, and complaints	Approach Road	Incidents, accidents, and community complaints	Monitoring	Based on occurrence	Contractor	BHTPA
<b>Operational Phase</b>								
Noise	Increase in ambient noise levels	Noise levels in day, night and hourly	Project site	24-hour	Noise Pollution Control Rules (2006)	1/year	O&M Unit by Engaging Environmental Firm	BHTPA
Water Quality	Contamination of surface water	Turbidity, pH, DO, Total dissolved solids, oil & grease, BOD <sub>5</sub> , COD, NH <sub>3</sub> , Tc, Fc	Canals inside the project area	Monitoring	Surface water quality standard as per Schedule 3 of ECR 1997	1/year	O&M Unit by Engaging Environmental Firm	BHTPA
Soil Quality	Soil Pollution	Heavy Metal	Project site soil	Monitoring	-	1/year	O&M Unit by Engaging Environmental Firm	BHTPA
Biological Environment	Horticulture and Greenbelt Development	Survival rate of plants and shrubs	Green belt	Monitoring	number successful growth	Quarterly	BHTPA	BHTPA
Disaster Management Plan (DMP) Monitoring	Earthquake	Structure Design	Project Area	As to be defined in the DMP to be prepared contractor	Not Specific	Continuou s	Operation & Maintenance Unit	BHTPA

	Flooding	Structure Design	Project Area	As to be defined in the DMP to be prepared contractor	Not Specific	Continuou s	Operation & Maintenance Unit	BHTPA
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## Annex E: Labor Management Procedure Template

Source: *The World Bank Labor Management Procedures: Version 1.0 – September 6, 2018*

### OVERVIEW OF LABOR USE ON THE PROJECT

This section describes the following, based on available information:

**Number of Project Workers:** The total number of workers to be employed on the project, and the different types of workers: direct workers, contracted workers and community workers. Where numbers are not yet firm, an estimate should be provided.

**Characteristics of Project Workers:** To the extent possible, a broad description and an indication of the likely characteristics of the project workers e.g. local workers, national or international migrants, female workers, workers between the minimum age and 18.

**Timing of Labor Requirements:** The timing and sequencing of labor requirements in terms of numbers, locations, types of jobs and skills required.

**Contracted Workers:** The anticipated or known contracting structure for the project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor. If it is likely that project workers will be engaged through brokers, intermediaries or agents, this should be noted together with an estimate how many workers are expected to be recruited in this way.

**Migrant Workers:** If it is likely that migrant workers (either domestic or international) are expected to work on the project, this should be noted, and details provided.

### ASSESSMENT OF KEY POTENTIAL LABOR RISKS

This section describes the following, based on available information:

**Project activities:** The type and location of the project, and the different activities the project workers will carry out.

**Key Labor Risks:** The key labor risks which may be associated with the project (see, for example, those identified in ESS2 and the GN). These could include, for example:

- The conduct of hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials
- Likely incidents of child labor or forced labor, with reference to the sector or locality
- Likely presence of migrants or seasonal workers
- Risks of labor influx or gender-based violence
- Possible accidents or emergencies, with reference to the sector or locality

### BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

This section sets out the key aspects of national labor legislation with regards to term and conditions of work, and how national legislation applies to different categories of workers identified in Section 1. The overview focuses on legislation which relates to the items set out in ESS2, paragraph 11 (i.e. wages, deductions and benefits).

### BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

This section sets out the key aspects of the national labor legislation with regards to occupational health and safety, and how national legislation applies to the different categories of workers identified in Section 1. The overview focuses on legislation which relates to the items set out in ESS2, paragraphs 24 to 30.

### RESPONSIBLE STAFF

This section identifies the functions and/or individuals within the project responsible for (as relevant):

- engagement and management of project workers
- engagement and management of contractors/subcontractors
- occupational health and safety (OHS)
- training of workers
- addressing worker grievances

In some cases, this section will identify functions and/or individuals from contractors or subcontractors, particularly in projects where project workers are employed by third parties.

#### **POLICIES AND PROCEDURES**

This section sets out information on OHS, reporting and monitoring and other general project policies. Where relevant, it identifies applicable national legislation.

Where significant safety risks have been identified as part of Section 2, this section outlines how these will be addressed. Where the risk of forced labor has been identified, this section outlines how these will be addressed (see ESS2, paragraph 20 and related GNs). Where risks of child labor have been identified, these are addressed in Section 7. Where the Borrower has stand-alone policies or procedures, these can be referenced or annexed to the LMP, together with any other supporting documentation.

#### **AGE OF EMPLOYMENT**

This section sets out details regarding:

- The minimum age for employment on the project
- The process that will be followed to verify the age of project workers
- The procedure that will be followed if underage workers are found working on the project
- The procedure for conducting risk assessments for workers aged between the minimum age and 18

See ESS2, paragraphs 17 to 19 and related GNs.

#### **TERMS AND CONDITIONS**

This section sets out details regarding:

- Specific wages, hours and other provisions that apply to the project
- Maximum number of hours that can be worked on the project
- Any collective agreements that apply to the project. When relevant, provide a list of agreements and describe key features and provisions
- Other specific terms and conditions

#### **GRIEVANCE MECHANISM**

This section sets out details of the grievance mechanism that will be provided for direct and contracted workers and describes the way in which these workers will be made aware of the mechanism. Where community workers are engaged in the project, details of the grievance mechanism for these workers is set out in Section 11.

#### **CONTRACTOR MANAGEMENT**

This section sets out details regarding:

- The selection process for contractors, as discussed in ESS2, paragraph 31 and GN 31.1.

- The contractual provisions that will put in place relating to contractors for the management of labor issues, including occupational health and safety, as discussed in ESS2, paragraph 32 and GN 32.1
- The procedure for managing and monitoring the performance of contractors, as discussed in ESS2, paragraph 32 and GN 32.1

### **COMMUNITY WORKERS**

Where community workers will be involved in the project, this section sets out details of the terms and conditions of work and identifies measures to check that community labor is provided on a voluntary basis. It also provides details of the type of agreements that are required and how they will be documented. See GN 34.4.

This section sets out details of the grievance mechanism for community workers and the roles and responsibilities for monitoring such workers. See ESS2, paragraphs 36 and 37.

### **PRIMARY SUPPLY WORKERS**

Where a significant risk of child or forced labor or serious safety issues in relation to primary suppliers has been identified, this section sets out the procedure for monitoring and reporting on primary supply workers.

## Annex F: Sample GRM Form

<b>Grievance Form: Bangladesh High-Tech Park Authority</b>			
Grievance reference number (to be completed by Project):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Bangla	<input type="checkbox"/> English	
Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.			
What is your suggested resolution for the grievance, if you have one? Is there something you would like BHTPA or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website <input type="checkbox"/>	Email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of BHTPA official assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
<b>Completion</b>			
Final resolution (briefly describe)			
	Short description	Accepted ? (Y/N)	Acknowledgement signature
1 <sup>st</sup> proposed solution			
2 <sup>nd</sup> proposed solution			
3 <sup>rd</sup> proposed solution			