

Recovery and Advancement of Informal Sector Employment (RAISE) (P174085)

DRAFT

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

[October 2020]

Government of Bangladesh

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Bangladesh (GoB) (the **Recipient**) will implement the Recovery and Advancement of Informal Sector Employment Project (the **Project**), with the involvement of Palli Karma-Sahayak Foundation (**PKSF**) and Wage Earner Welfare Board (**WEWB**) (jointly, the **Implementing Agencies or IAs**). The International Development Association, (the **Association**) has agreed to provide financing for the Project.
2. The Recipient will implement material measures and actions so that the Project is implemented in accordance with Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF, for WEWB), Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP), and Environmental and Social Management System (ESMS, for PKSF) and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the IAs referenced in 1 above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Recipient. The Recipient will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association, regular monitoring reports on environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p> <p>Deploy Independent Verification Consultants (IVCs) for monitoring and verifying project outputs and carryout independent environmental, social, health and safety audit to propose corrective measures.</p>	<p>Submit Half yearly (every six months) reports in an agreed format throughout Project implementation as part of Project Reports. The Project Report will be submitted within 30 days after the end of each calendar semester.</p> <p>Deploy IVCs before mid-term review</p>	IAs
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including accidents that could result in fatalities, injuries, cases of GBV/SEA, serious mismanagement in handling waste, security breach, etc, provide sufficient details regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association within 24 hours of learning of the accidents or incidents.</p> <p>Provide a report on action taken on the same by 07 (Seven) days of notifying the Association.</p>	IAs (PMUs)
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p>	<p>Appointment of all specialists (1 ES, 1 SDS, 1 SES) will be completed within</p>	IAs (PMUs)

	<p>PKSF to recruit an Environmental Specialist (ES) – responsible for addressing environmental risks/impacts, environment related occupational health and safety issues as well as waste management issues and a Social Development Specialist (SDS) – responsible for addressing risks associated with social issues (labor, gender, OHS), and for monitoring and ensuring application of COVID-19 protocol of Ministry of Health and Family Welfare (MoHFW) and World Health Organization (WHO) with qualifications, experience and under terms of reference satisfactory to the Association. Specialists may be taken from existing Environment and Climate Change Unit of PKSF or inducted in that unit as part of the project.</p> <p>WEWB to recruit a Social and Environmental Specialist (SES) – responsible for addressing risks associated with social issues (labor, gender, OHS) and environmental issues</p>	<p>3 months after the Effective Date The specialists will provide inputs as necessary throughout the Project implementation. Until the recruitment, the IA’s existing staff will support the project’s E&S management.</p>	
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT PKSF’s ESMS was reviewed and recommendations made under ESSg of ESCP. Update ESMS as per recommendations.</p> <p>WEWB to prepare an Environmental and Social Management Frameworks (ESMF) detailing policy, procedure and guidance for assessment and management of environmental and social risks and impacts.</p> <p>Prepare and disclose E&S assessment and screening for sub-projects as soon as they are known.</p> <p>Upon activation of CERC, prepare a brief CERC-ESMF, update related E&S instruments (SEP, ESCP, ESMF and Grievance Mechanism) as required</p>	<p>ESMS updated and approved by PKSF senior management prior to the commencement of Project activities by PKSF</p> <p>WEWB ESMF disclosed before Project appraisal</p> <p>During appraisal of each sub-project</p> <p>Upon activation of CERC</p>	<p>PKSF Management and WEWB’s PMU (E&S Specialists)</p> <p>CERC Implementation Agency</p>
1.3	<p>ELIGIBILITY CRITERIA FOR SUBPROJECT Implement the screening mechanism and exclusion list (which is a part of PKSF ESMS) to verify that sub-projects meet the eligibility criteria and ensure that such sub-projects will not</p>	<p>Exclusion list is a part of ESMS</p>	<p>PKSF PMU</p>

	adversely impact the environment and the people. Conduct screening to exclude those in the exclusion list and keep the screening documentation during the project implementation.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: Implement the Project in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), ensuring appropriate working condition amidst a public health emergency (including measures against outbreak of COVID-19); provision of training/apprenticeship on handling emergency situation especially health related issues; and setting out grievance arrangements for Project workers, and incorporating labor requirements in the procurement documents and contracts with contractors and supervising firms. The Recipient will prohibit child labor (any person under the age of 18), forced labor and trafficked persons.</p> <p>Prepare a Labor Management Procedures (LMP) for implementation throughout the Project.</p>	LMP disclosed before appraisal and measures will be implemented throughout Project implementation.	IAs (Social Specialists of PMUs)
2.2	<p>GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a GRM for the Project which will include issues of Project workers, as described in the LMP</p>	GRM for the workers will be established before commencement of Project activities and it will remain operational throughout Project implementation.	IAs (Grievance RedressalCenters)
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in LMP, especially measures related to mitigating COVID-19 risks.</p>	Before beginning of project activities and maintained throughout Project implementation	IAs (PMUs)
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p>	The operation manual approved prior to the commencement of Project activities by PKSf	PKSF (PMU)

	<p>PKSF ESMS (refer 1.3 above) includes an exclusion list of interventions/ businesses that could potentially create significant pollution adversely affecting the environment. In addition, the operation manual specifies that any sub-projects with substantial and high ES risks will be ineligible.</p> <p>Mainstream, in Component-2 training packages, the business practices of Sustainable Enterprise Project (SEP) supported microenterprises (those adhere to low-polluting and environment-friendly practices)</p>	<p>Training modules to be prepared prior to the commencement of entrepreneurship training package under Part 2 of the Project</p>	
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>Put measures in place to prevent or minimize the spread of the infectious diseases/COVID-19 to the community and among workers/beneficiaries by following national and WHO guidelines of social distancing and other measures.</p> <p>Ensure the avoidance of all forms of Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA) by establishing written Codes of Conduct for all workers in the project area as well as train and sensitize them on this issue. Prepare SEP and adopt and implement a Project Grievance Redress Mechanism (GRM) under SEP as well as a labor related GRM under LMP. Project GRM will also manage the risks of GBV and SEA.</p>	<p>ESMS (PKSF), ESMF (WEWB) and SEP have been prepared and community health and safety issues described therein will be adopted and followed throughout Project implementation (including all required updates to the documents). WEWB ESMF and SEP will be disclosed before Appraisal, PKSF ESMS prior to the commencement of Project activities by PKSF</p>	<p>IAs (ES Specialists of PMUs)</p>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>ESMS (Refer to 1.3 above) includes an exclusion list and that any sub-projects requiring land acquisition will be excluded</p>	<p>ESMS (including exclusion list) disclosed prior to the commencement of Project activities by PKSF</p>	<p>PKSF (Environment Specialists of PMUs)</p>
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS: ESMS (Refer 1.3 above) includes an exclusion list so that potential business/ microenterprise that may adversely affect biodiversity and living natural resources are not funded.</p>	<p>ESMS (including exclusion list) disclosed prior to the commencement of Project activities by PKSF</p>	<p>PKSF (Environment Specialists of PMUs)</p>
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

7.1	<p>INDIGENOUS PEOPLES PLAN: The Project is unlikely affect any small ethnic minority meeting the requirement of ESS7</p>	Not Relevant	Not Relevant
ESS 8: CULTURAL HERITAGE			
8.1	ESMS (refer 1.3 above) includes an exclusion list that will not fund any potential business/ microenterprise that may adversely affect any cultural heritage	ESMS (including exclusion List) disclosed prior to the commencement of Project activities by PKSF	PKSF PMU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	<p>Existing PKSF's ESMS will be updated and address the following issues:</p> <p>(i) Develop a ES policy statement to assess and manage ES risks and impacts endorsed by the senior management; (ii) Enhance the capacity of the Environmental and Climate Change unit by recruiting additional Environmental and Social specialists (which may include gender/GBV specialist, climate change specialist, waste management specialist, biodiversity specialist, labor law expert, occupational health and safety specialist, stakeholder engagement specialist, field researchers); (iii) Develop training policy and training plan for staffs on E&S issues and develop a complete training manual/ curriculum including audio visual presentations; (iv) Clear description of relevant national laws and their adoption in the ESMS; (v) Align the risk categorization system of existing ESMS for both environmental and social risks with national/ ESF risks rating (four instead of three); (vi) Detail description of reporting requirement, channel and frequency of reporting and person responsible; (vii) Develop a beneficiary screening mechanism and format including women, people with disability and the vulnerable; (viii) Develop OHS measure as per Good International Industry Practices and employment of child between 14 to 18; (ix) Develop measures to address formation of labor/workers/employee organizations (x) Develop a guidance for</p>	<p>IA will ensure ESMS is updated, approved and disclosed prior to the commencement of Project activities by PKSF.</p> <p>IA shall ensure that PO has adopted ESMS within 45 days after signing the PO Subsidiary Financing Agreement or prior to commencing any Project activities, whichever is earlier.</p>	PKSF PMU, POs and the Association

	<p>legal agreement structure between the PKSF and its POs/ participating FIs, legally binding POs to adopt the ESMS.</p> <p>Ensure that each PFIs/POs have a staff dedicated to oversee its ES activities, monitor and report on the same.</p>		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, update, adopt, and implement Stakeholder Engagement Plan (SEP) including a Grievance Redress Mechanism (GRM)</p>	<p>SEP (including GRM) prepared and disclosed prior to Project appraisal and adopted, updated and implemented throughout the Project implementation period.</p>	<p>IAs (Social Specialists of PMUs)</p>

CAPACITY DEVELOPMENT SUPPORT (TRAINING)		
Specify Training to be provided	Targeted Groups and Timeframe	Training Completed
<p>The IAs, (with support of third-party resources <i>if</i> 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. This ESCP proposes a preliminary training plan covering the following topics. This plan will be adapted to meet needs during Project implementation.</p>		
<p>ESF. Training on ESF and the 10 ESSs—including preparation of ESMP</p>	<p>Personnel directly related with project at the IAs</p>	<p>Within 30 days after the Effective Date</p>
<p>Issues Related to COVID-19</p> <ul style="list-style-type: none"> • Use and disposal of PPE (for all) • Working/training in COVID-19 environment (All workers and beneficiaries) • COVID-19 Infection Prevention and Control mechanism • Standard precautions for COVID-19 (social distancing etc) • Risk communication, prevention and community engagement (Administrative and operational personnel) 	<p>Officials of IAs, Trainers, Welfare Officers</p>	<p>Within 30 days after the Effective Date and if needed quarterly thereafter</p>

<ul style="list-style-type: none"> • WHO and CDC guidelines on quarantine 		
<p>Occupational Health and Safety Module:</p> <ul style="list-style-type: none"> • Workplace risk management • Prevention of accidents at work sites • Health and safety rules • Preparedness and response to emergency situations 	Officials of IAs, Trainers and Welfare Officers	Within 30 days after the Effective Date and thereafter every six months throughout the project implementation
<p>Labor and Working Conditions</p> <ul style="list-style-type: none"> • Terms and conditions of employment according to national working laws and regulations • Codes of Conduct • Worker’s organizations • Child labor and minimum age employment rules 	IAs Local officials, POs, Workshops/ Microenterprises, Welfare Officers	Within 30 days after the Effective Date
<p>Grievance Redress Mechanism Module, design and production of a training module addressing the following aspects:</p> <ul style="list-style-type: none"> • Registration and processing procedure • Grievance redress procedure • Documenting and processing grievances • Use of the procedure by different stakeholders 	Consultants IAs’ Officials, POs, Welfare Officers	Within 30 days after the Effective Date and thereafter once every twelve months throughout the Project implementation
<p>GBV Risk Module Raising awareness and measures to prevent and mitigate GBV/SEAH risks. The topics and activities will be developed and included in the Project GRM.</p>	IAs Local officials, Trainers	Within 30 days after the Effective Date and thereafter once every twelve months throughout the Project implementation