

# **People's Republic of Bangladesh**

## **Department of Environment (DoE)**

Ministry of Environment, Forest and Climate Change (MoEFCC)

## **Bangladesh Road Transport Authority (BRTA)**

Ministry of Road Transport and Bridges (MoRTB)

## **Dhaka Transport Co-ordination Authority (DTCA)**

Ministry of Road Transport and Bridges (MoRTB)

# **BANGLADESH CLEAN AIR PROJECT (BCAP)**

**(P502572)**

# **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)**

**[Negotiated Version]**

**[May 17, 2025]**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The People’s Republic of Bangladesh (the Recipient) will implement the Bangladesh Clean Air Project (BCAP) (the Project), with the involvement of Department of Environment (DoE) under Ministry of Environment, Forest and Climate Change (MoEFCC); Bangladesh Road Transport Authority (BRTA) and Dhaka Transport Co-ordination Authority (DTCA) under Ministry of Road Transport and Bridges (MoRTB), as set out in the Financing Agreement (the Agreement). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring, and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed, and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient, through DoE, DTCA and/or BRTA. The Recipient, through DoE, DTCA and/or BRTA shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below, irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT <sup>1</sup>			
A	<b>ORGANIZATIONAL STRUCTURE</b> <ol style="list-style-type: none"> <li>1. Establish and maintain a Project Implementation Unit (PIU) at DoE, BRTA, and DTCA, each with qualified staff and resources to support the management of the project's environmental, social, health, and safety (E&amp;S) risks and impacts. For DoE, this will include: one Environmental and OHS Specialist; one Social and Stakeholder Engagement Specialist and one Gender and SEA/SH Specialist. As regards BRTA, and DTCA, the respective PIUs will each hire: one Environmental and OHS Specialist; one Resettlement and Social Development Specialist, and one Gender and SEA/SH Specialist.</li> <li>2. Hire a Design and Supervision Consultancy Firm (DoE, BRTA &amp; DTCA). Each firm will include 1 Environmental and OHS Specialist, 1 Social Development Specialist, 2 Resettlement Specialists (only for BRTA and DTCA) and 1 Gender and GBV Specialist, and resources to support the management of the project's ESHS risks and impacts.</li> <li>3. BRTA and DTCA will hire a resettlement implementation NGO (I-NGO) to assist the respective PIUs with the site-specific resettlement action plan (RAP) and land acquisition proposal (LAP).</li> </ol>	<ol style="list-style-type: none"> <li>1. Establish the PIU with requisite ES staff 3 months from the Effectiveness and thereafter maintain the PIU and these positions throughout Project implementation.</li> <li>2. Within 6 (six) months after Effectiveness and thereafter maintain the Supervision Consultancy Firm throughout Project implementation.</li> <li>3. Within 9 (nine) months after Effectiveness and thereafter maintain the I-NGO throughout Project implementation.</li> </ol>	<ol style="list-style-type: none"> <li>1. DoE, BRTA and DTCA</li> <li>2. DoE, BRTA and DTCA</li> <li>3. BRTA and DTCA</li> </ol>

<sup>1</sup> For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p><b>CAPACITY-BUILDING PLAN/MEASURES</b></p> <p>1. All Project workers (including for construction works such as contractors) to receive training on:</p> <ul style="list-style-type: none"> <li>• Occupation Health and Safety (OHS)</li> <li>• Community Health and Safety (CHS)</li> <li>• Prevention of Gender-based Violence/SEA/SH</li> <li>• Reporting on incidents and accidents and emergency preparation and response preparedness</li> <li>• Grievance Mechanism, especially for GBV/SEA/SH</li> <li>• Resource Efficiency and Pollution Prevention and Management</li> <li>• Waste Management</li> </ul> <p>2. PIU staff to receive training on:</p> <ul style="list-style-type: none"> <li>• ESF and implementation of environmental and social instruments</li> <li>• Stakeholder engagement and Grievance Redress Mechanism (GRM)</li> <li>• Community Health and Safety and GBV/SEA/SH, including GRM for SEA/SH</li> <li>• Resettlement and Land acquisition</li> <li>• Labor Management and labor GRM</li> <li>• Resource Efficiency and Pollution Prevention and Management</li> <li>• Occupational Health and Safety (OHS)</li> <li>• Reporting on incidents and accidents and emergency preparation and response preparedness</li> </ul>	<p>1. The capacity-building measures will be ongoing throughout Project implementation, ensuring all workers are equipped with the necessary skills and knowledge, even when new workers are engaged.</p> <p>2. At the start of the project implementation and refreshers on a bi-annual basis</p>	<p>1. DoE, BRTA &amp; DTCA</p> <p>2. DoE, BRTA &amp; DTCA</p>
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health, and safety (E&amp;S) performance of the Project, including but not limited to</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out per the Stakeholder Engagement Plan.</li> <li>• Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>• E&amp;S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports.</li> </ul>	<p>Submit quarterly progress reports to the Association throughout Project implementation, commencing six months after the Effective Date.</p> <p>The PIU of DoE, BRTA, and DTCA will submit the compiled progress report to the Association no later than 15 days after the end of each reporting period.</p>	DoE, BRTA & DTCA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>The number and status of the resolution of incidents and accidents reported under action E are below.</li> </ul>		
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firm to provide monthly monitoring reports on E&amp;S performance using the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above.	DoE, BRTA & DTCA
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Association of any incident or accident relating 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 those resulting in death or substantial injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide the Association with available details of the incident or accident upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying, and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide a review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice unless a different timeframe is agreed to in writing by the Association.</p>	DoE, BRTA & DTCA
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <ol style="list-style-type: none"> <li>A draft Environmental and Social Management Framework (ESMF) has been prepared and disclosed prior to appraisal. Update the ESMF for the project, consistent with the relevant ESSs following the framework approach of the project's E&amp;S assessment and management procedure.</li> <li>Prepare subcomponent-wise site-specific Environmental and Social Impact Assessments (ESIA), including Environmental and Social Management Plans (ESMPs) as applicable per the ESMF. Activities described in the exclusion list set out in the ESMF shall be ineligible for financing under the project. Incorporate the ESMP and required Bill of Quantities (BoQ) as part of the bidding documents for the respective activities/components that require the preparation of such an ESMP.</li> <li>Prepare a Project Operations Manual (POM) that includes the overall management of the project's E&amp;S risks,</li> </ol>	<ol style="list-style-type: none"> <li>The draft ESMF must be updated within 60 days from Effectiveness. Thereafter, the ESMF will be implemented throughout the project.</li> <li>Upon screening and confirmation of project sites, prepare ESIA/ESMP prior to any relevant civil works commence, and implement the respective ESIA/ESMP throughout the sub-Project implementation.</li> <li>Prior to Effectiveness.</li> </ol>	DoE, BRTA & DTCA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including inter alia the relevant E&amp;S assessments or plans, such as the Labor Management Procedures (LMP) and the Code of Conduct (CoC), into the E&amp;S specifications of the procurement documents and contracts with contractors and supervising firm.</p> <p>Thereafter, ensure that the contractors and supervising firm comply and that they require their subcontractors to comply with the E&amp;S specifications of their respective contracts. Provide copies of the relevant agreements with contractors/subcontractors and supervision firms to the Association.</p>	<p>During the preparation of bid documents and throughout Project implementation.</p> <p>Supervise contractors throughout Project implementation.</p>	DoE, BRTA & DTCA
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project by terms of reference acceptable to the Association and consistent with the ESSs. Thereafter, prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	DoE, BRTA & DTCA
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare and implement the Labor Management Procedures (LMP) for the Project with provisions on working conditions, management of worker relationships, occupational health and safety (including personal protective equipment and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firm.</p>	Prepare the LMP within 60 days of Effectiveness and thereafter implement it throughout the Project's implementation.	DoE, BRTA & DTCA
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>Prepare and implement an Occupational Health and Safety (OHS) Management Plan to assess and manage the project's OHS risks and impacts.</p>	Before the commencement of any construction /physical works, implement throughout Project implementation.	DoE, BRTA & DTCA
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish a GM before engaging Project workers and maintain and operate it throughout Project implementation.	DoE, BRTA & DTCA
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	same timeline as ESMP in action 1.1.2	DoE, BRTA & DTCA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Resource efficiency, pollution prevention, and management measures should be incorporated in the ESMP to be prepared under action 1.1 above.	Same timeframe as ESMP in action 1.1.2.	DoE, BRTA & DTCA
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.	Same timeframe as ESMP in action 1.1.2.	DoE, BRTA & DTCA
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Assess and manage specific risks and impacts to the community arising from Project activities and include mitigation measures in the ESMPs to be prepared under action 1.1 above.	Same timeframe as ESMP in action 1.1.2.	DoE, BRTA & DTCA
4.3	<b>SEA AND SH RISKS</b> Prepare and implement a SEA/SH Action Plan (to be incorporated subsequently into the POM) to assess and manage the risks of SEA and SH.	Before the Project Effectiveness, and thereafter to be implemented throughout the Project.	DoE, BRTA & DTCA
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE, AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT FRAMEWORK</b>  Prepare, disclose, and implement the Resettlement Policy Framework (RPF), consistent with ESS5.  Prepare and implement a Resettlement Action Plan (RAP), consistent with ESS5.	Prepare the RFP within 60 days of Project Effectiveness and implement the RPF throughout Project implementation. Prepare and implement the respective RAP or LRP prior to carrying out the relevant civil works, including ensuring that full compensation and moving allowances have been provided as well as displaced people have been resettled before taking possession of the land and related assets.	DoE, BRTA & DTCA
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> The ESS6 is irrelevant due to the project's location in areas of minimal biodiversity significance, where the potential impact on natural resources remains negligible. Additionally, the nature and scale of activities typically result in minimal disruption to local ecosystems and biodiversity. Therefore, the specific requirements and standards outlined in ESS6 are unnecessary to address or implement in this context. However, should any biodiversity-sensitive or protected areas be identified during the project implementation stage, ESS6 would then become relevant.	If risks on sites of biodiversity value are identified during screening, measures must be taken as per the mitigation hierarchy before any civil activities begin.	DoE, BRTA & DTCA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p><b>INDIGENOUS PEOPLES PLAN</b></p> <p>1. Prepare and implement a Small Ethnic Communities Development Framework (SECDF) for the Project, consistent with ESS7. The SECDF will be integrated into the project ESMF with the related section(s) laying down the principles and approaches consistent with ESS7.</p> <p>2. Prepare and implement a Small Ethnic and Vulnerable Communities Development Plan (SECDP) based on the SECDF for each activity under the Project for which screening shows SECDF is required, consistent with ESS7.</p>	<p>Same timeframe as EMSF in action 1.1.1..</p> <p>Prepare the SECDF before carrying out any activity that requires the preparation of such SECDF. Once finalized, implement the respective SEVCDP throughout the project's implementation.</p>	DoE, BRTA & DTCA
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS</b></p> <p>Describe and implement the chance finds procedures as part of the ESMF and ESMP of the Project.</p>	Same timeframe as ESMF/ESMP in action 1.1..	
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	<p><b>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</b></p> <p>Not applicable.</p>		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Prepare and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. It will be updated and redisclosed, as needed, periodically to address recent and upcoming issues, necessitating stakeholder consultation and closing the feedback loop.</p>	Prepare and disclose before appraisal, and thereafter, to implement throughout the project.	DoE, BRTA & DTCA
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism to receive and facilitate the resolution of concerns and grievances related to the Project promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p>	Establish the grievance mechanism within 3 months of the project's effectiveness and thereafter maintain and operate the mechanism throughout project implementation. Until the GRM is effective, the IA's own GRM will receive and address the grievances following the described process.	DoE, BRTA & DTCA



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.		
<b>INDICATORS FOR IMPLEMENTATION READINESS</b> [This subsection lists the ESCP actions (by their numbering in the first column of the ESCP) identified as relevant to monitor project readiness from an E&S standpoint. These may include actions related to: i) establishment of E&S risk management units in the Project Implementation Entities, ii) recruitment and training of E&S staff within Project Implementation Entities, iii) Memorandums of Understanding or other written agreements/arrangements between Project Implementation Entities and other concerned agencies to ensure proper coordination of E&S risk management activities; iv) E&S effectiveness or disbursement conditions, if deemed warranted, v) ES assessments and plans to be prepared by the Borrower at the onset of implementation; vi) other project-specific requirements related to E&S readiness for implementation].			
The following actions are indicators of implementation readiness: <ul style="list-style-type: none"> <li>SEP, ESCP and draft ESMF, are prepared and disclosed. The instruments (i.e. framework documents (like ESMF, RPF, SECDF), LMP, as well as the subproject specific ES screening/assessment will be prepared and disclosed as indicated in this ESCP).</li> </ul>			