

People's Republic of Bangladesh

**Strengthening Social Protection for
Improved Resilience, Inclusion and Targeting
(P508519)**

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

**For Negotiations
04 Feb 2025**

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The People's Republic of Bangladesh (the Recipient) will implement the Strengthening Social Protection for Improved Resilience, Inclusion and Targeting (P508519) Project (the Project), with the involvement of the Department of Social Services (DSS) of the Ministry of Social Welfare and Finance Division (FD) of the Ministry of Finance, 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 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 (ES) 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 ES 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 the DSS and/or FD. The Recipient, through the DSS and/or the FD, 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			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain PIU (DSS) and Implementation Unit (Social Protection Budget Management Unit of FD) with qualified staff and resources to support management of ESHS risks and impacts of the Project and appoint one ES Specialist (with Gender and SEA/SH expertise) to work for the PIU and the Implementation Unit</p>	<p>Establish and maintain the PIU and the Implementation Unit as set out in the Financing Agreement. Initiate the process for recruiting the ES Specialist within one month of establishment of PIU and Implementation Unit. Prior to the recruitment of the ES Specialist, assign one ES focal point from the PIU and Implementation Unit to work in lieu of the Specialist.</p>	<p>PIU of Department of Social Service (DSS)</p> <p>Implementation Unit and Coordination Committee of Finance Division (FD)</p>
B	<p>CAPACITY BUILDING MEASURES</p> <p>Develop and provide following capacity assessment/training to the relevant target groups, such as PIU staff, workers and staffs working in the projects, consultants, etc:</p> <ul style="list-style-type: none"> • Introduction to World Bank ESF • Labor and working conditions including OHS • Stakeholder Engagement • ES compliance monitoring and audit • Incident reporting ESIRT • SEA/SH and mitigation measures • Planning and implementation of GRMs 	<p>Develop and provide capacity development measures beginning from three month after the effectiveness and continue throughout the Project implementation.</p>	<p>PIU of Department of Social Service (DSS)</p> <p>Implementation Unit and Coordination Committee of Finance Division (FD)</p>
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental and social performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of ES instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.</p>	<p>Submit semi-annual progress reports to the Association throughout Project implementation, commencing three months after the effectiveness. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p>PIU of Department of Social Service (DSS)</p> <p>Implementation Unit and Coordination Committee of Finance Division (FD)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	<p>INCIDENTS AND ACCIDENTS</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 significant 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 available details of the incident or accident to the Association 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 be taken 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 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>	<p>PIU of Department of Social Service (DSS)</p> <p>Implementation Unit and Coordination Committee of Finance Division (FD)</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Adopt and implement the Project Operations Manual (POM) to screen all activities supported under the Project, and to assess and mitigate any ES risks and impacts from these activities. Any activities with substantial and high ES risk and impact shall be ineligible to receive financing under the Project.</p>	<p>Develop and adopt the POM (including the exclusion list) within six months of the effectiveness and thereafter implement it throughout the Project implementation.</p>	<p>PIU of Department of Social Service (DSS)</p> <p>Implementation Unit and Coordination Committee of Finance Division (FD)</p>
1.2	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>1. Ensure that the CERC Manual includes a description of the ES assessment and management arrangements (CERC-ESMF) for the implementation of CERC component, in accordance with the ESSs.</p> <p>2. Implement the ES provisions of the CERC Manual [including the CERC-ESMF and any assessments and plans required therein].</p>	<p>a) The adoption of the CERC Manual (including CERC-ESMF) in form and substance acceptable to the Association is a withdrawal condition of the legal agreement for the Project.</p> <p>b) In accordance with the timeframes specified in the CERC Manual</p>	<p>Will be decided upon activation of the CERC</p>
1.3	USE OF RECIPIENT ENVIRONMENTAL AND SOCIAL FRAMEWORK		PIU of Department of Social Service (DSS)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Ensure that the labor management and working conditions, e-waste management procedures, grievance handling system are consistent with this ESCP and with the Recipient's labor framework, waste management procedures, grievance handling policies which includes, inter alia, the country's relevant policy, legal and institutional framework, including its national, departmental, or local implementing institutions, and the applicable laws, regulations, procedures, and implementation capacity. The POM will include gap-filling actions to ensure compliance with the World Bank Environmental and Social Framework (ESF) and enhance socially inclusive, environmentally sustainable outcomes for the project.</p> <p>Promptly notify the Association of any changes to the Recipient's ES Framework that may materially adversely affect the Recipient's ability to manage the ES risks and impacts of the Project in line with the ESSs and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Association, such changes adversely affect relevant ESHS risk management aspects of the Project, the Recipient shall agree to implement measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions.</p>	<p>Develop and adopt the POM (including the exclusion list) within six months of the effectiveness and thereafter implement it throughout the Project implementation.</p> <p>Notify the Association immediately after taking notice of the change to the Recipient's ES Framework. Subsequent actions, if requested by the Association, shall reflect in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.</p>	Implementation Unit and Coordination Committee of Finance Division (FD)
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	PIU of Department of Social Service (DSS)
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The Project will adopt procedure and processes to ensure labor related issues, including non-discrimination, OHS, equal opportunities, good working conditions, safety at workplace are taken care of.</p> <p>The Project will engage civil servants under the government employment rules and provisions of child labor, forced labor and Occupational Health and Safety (OHS) would be applicable to them. There would be individual consultants contracted for the Project. Implementing agencies will ensure that workers are engaged and dealt during implementation of Project activities in line with the Bangladesh Labor Law. To this end, the following measures will be carried out (which will be included in the POM):</p>	<p>Adopt labor related measures before the assignment of workers and ensure such provisions are maintained through the implementation of the Project.</p>	<p>PIU of Department of Social Service (DSS)</p> <p>Implementation Unit and Coordination Committee of Finance Division (FD)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> a) Provide workers with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable; b) Implement occupational health and safety measures, taking into account the General Environmental, Health and Safety Guidelines (EHSG), and other relevant Good International Industry Practice (GIIP) and, as appropriate, the industry specific EHSGs and other GIIP; c) Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance and redress mechanisms without fear of retaliation; and effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions; d) Implement a code of conduct for workers (as included in the POM), which shall include measures to prevent and respond to SEA/SH cases; safeguard against workplace harassment, that promotes non-discrimination and equal opportunity for all. 		
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Adopt existing Project GRM of DSS to address labor related grievances, that includes:</p> <ul style="list-style-type: none"> a) A channel for workers to raise grievances without fear of retaliation b) A mechanism to uptake, solve, manage and implement redressal measure c) A mechanism to disseminate information of the existence of such mechanism to all Project personnel. 	<p>Adopt the existing grievance mechanism of DSS to address Project workers' issues, complaints and suggestions and continue it throughout Project implementation.</p>	<p>PIU of Department of Social Service (DSS)</p> <p>Implementation Unit and Coordination Committee of Finance Division (FD)</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Include, in the Project Operations Manual (POM) aspects of e-waste management to manage e-waste, consistent with ESS3.</p>	<p>Prepare the POM (including provisions of e-waste management) within six months of effectiveness and thereafter implement the e-waste management provisions throughout Project implementation.</p>	<p>PIU of Department of Social Service (DSS)</p> <p>Implementation Unit and Coordination Committee of Finance Division (FD)</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.1	SEA AND SH RISKS Prepare and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH.	Prepare the SEA/SH Action Plan within 3 months of effectiveness and thereafter implement the SEA/SH Action Plan throughout Project implementation.	PIU of Department of Social Service (DSS) Implementation Unit and Coordination Committee of Finance Division (FD)
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not currently relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Not currently relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLAN Adopt and implement measures to address impacts on the Small Ethnic Communities (SEC) in the Project Operations Manual (POM) in a culturally cognizant manner, consistent with ESS7. Adopt the Project GRMs to address the issues of SECs being cognizant of the cultural, linguistic and social differences	Prepare the POM (including provisions of measures to address impacts on SEC) within six months of effectiveness and thereafter continue the provisions throughout Project implementation. Use existing GRM to address issues pertaining to SECs.	PIU of Department of Social Service (DSS) Implementation Unit and Coordination Committee of Finance Division (FD)
ESS 8: CULTURAL HERITAGE			
8.1	Not currently relevant		
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	Not currently relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT – PREPARATION AND IMPLEMENTATION Stakeholder engagement will be carried out continuously throughout the Project implementation including provision of providing stakeholders with timely relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free from manipulation, interference, coercion, discrimination and intimidation. Identification of stakeholders, including the affected and interested parties (government and NGO, think tanks, beneficiaries, academics), the vulnerable and the disadvantaged to be made at Project level to ensure inclusion and access to information and services.	Carryout stakeholder identification, consultation and engagement at the beginning Project implementation and ensure continuation thereafter.	PIU of Department of Social Service (DSS) Implementation Unit and Coordination Committee of Finance Division (FD)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Continuously engage and consult with the stakeholder at appropriate time and place to provide Program related information including ES risks and impacts and seek their input and feedback in a culturally appropriate and safe manner without coercion, discrimination, intimidation or fear of retaliation.</p> <p>Provide support to build administrative and stakeholder capacity to establish a feedback mechanism that contributes to effective Project management.</p> <p>Design Project activities as per the stakeholder inputs and report back to them to complete the feedback loop in a culturally appropriate and timely manner.</p> <p>Remove obstacles to participation and ensure views of differently affected groups are captured. Ensure inclusion of the vulnerable and the disadvantaged in consultation and participation.</p>		
10.2	<p>GRIEVANCE REDRESS MECHANISM (GRM)</p> <p>Adopt the existing GRM of DSS to receive grievances, including adoption of channels to receive grievances and mechanism to address complaints. The Implementing agencies will receive grievances and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously. The GRM will be suited to address workers complaints and be suitable to address SEA/SH complaints.</p> <p>Ensure the Dynamic Social Registry (DSR) enhances pathways for citizens to voice concerns, flag exclusion, and make complaints through augmenting and linking existing DSS GRM tools and development of a grievance redress guidelines.</p>	<p>Adopt and implement the existing GRM of DSS and continue throughout the project.</p>	<p>PIU of Department of Social Service (DSS)</p> <p>Implementation Unit and Coordination Committee of Finance Division (FD)</p>
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness:			
<p>Section 1: A. Assignment of ES Specialist</p> <p>Section: 10.2. Adoption of existing DSS GRM</p>			