



**Government of the People's Republic of Bangladesh**

**Economic Acceleration and Resilience for  
NEET Project (EARN Project)**

**WB Project ID: P178077**

**Environmental and Social Management Framework  
(ESMF)**

**Department of Youth Development (DYD)  
Ministry of Youth and Sports (MoYS)**

**[www.moysports.gov.bd](http://www.moysports.gov.bd)**

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## Executive Summary

The Peoples Republic of Bangladesh is preparing the ‘Economic Acceleration and Resilience for NEET Project (EARN Project - the Project)’ by the Department of Youth Development (DYD) of the Ministry of Youth and Sports (MoYS) and seeking finance from the International Development Association (IDA) of the World Bank for implementation. The Project is intended for establishing a holistic system with greater focus on women, to enhance access to skills development, education and labor market opportunities for the youth not in employment, education and training (NEET) for wage and self-employment. The objective of the Project is to increase access to education, skills training and promote employability for NEET youth, especially for women, in selected rural areas, to accelerate reduction of share of NEET youth in Bangladesh. The total cost of the Project is estimated at US\$ 364 million of which IDA’s financing will be USD 354 million. The project will leverage technical resources from other Development Partners (DPs) in the form of technical assistance, and in areas where the project would complement ongoing activities supported by DPs. Duration of the project is five and half years from 2023 through 2028. The World Bank Environmental and Social Framework (ESF) will apply to the Project in addition to national legislative requirements on environmental and social management.

DYD, in response to the national legal framework and requirements of the World Bank, has developed this Environmental and Social Management Framework (ESMF) along with stand-alone Labor Management Procedures (LMP) and Stakeholders Engagement Plan (SEP) to guide environmental and social (E&S) management during project implementation. The ESMF has been reviewed and concurred by the World Bank for disclosure in country before appraisal.

### Project Description

The project will be implemented in selected rural and semi-urban regions. A total of 250 upazilas (out of 506) are selected based on three criteria. The Project has five components.

The Component 1 will be implemented to enhance access to alternate education and relevant skills development opportunities (US\$ 115.58 m) through (1.1) promote access to skills development on market relevant skills including SEB and EDT (US\$85.23 m); and (1.2) assist the secondary dropped-out NEET youth to reach the skills ladder (US\$ 30.35 m).

Component 2 is designed to promote support for wage and self-employment (US\$ 121.53 m) through (2.1) connecting the beneficiaries with employers (US\$ 6.03 m); (2.2) post-training wage employment and entrepreneurship support (US\$ 115.50 m) including (A) strengthen the DYD’s seed financing mechanism (US\$40 m), (B) technical assistance (US\$2 m) and (C) Post-Training Specialization and Employment Support (US\$73.5 m).

Component 3 will be for promoting enabling environment for NEET youth (US\$ 22.81 m) through (3.1) community strengthening, engagement and ownership (US\$ 3.67 m), (3.2) Awareness raising and community engagement to promote positive social norms (US\$12.35 million) and (3.3) Career counseling support, leadership development and positive youth engagement activities (US\$ 6.79 m).

Component 4 is for enhancing institutional capacity and project management (US\$ 104.08 m) through renovation and refurbishment of infrastructure at training centres (TC) and project management support.

These include (4.1) support institutional capacity development for NEET youth programs (US\$ 81.19m) and (4.2) project management, communications, and monitoring and evaluation (US\$ 22.89 m).

Component 5 of the project is for contingent emergency response with a zero allocation for undertaking any activity to respond to any emergency situation declared by the Government.

A total of 1.2 million NEET youth would be directly benefited by the project activities. Skill development and assistance to reach the skill ladder would cover 1 million beneficiaries. An additional 0.2 million beneficiaries – who received skill development trainings already from other World Bank funded projects (ASSET and/or RAISE) but remained NEET in the selected upazilas – will receive Socio-Emotional and Behavioral (SEB) training and Enterprise Development Training (EDT). All other supports (internship, seed financing) will cover selected subsets of the 1.2 million project beneficiaries based on support-specific eligibility criteria.

### **Application of National Legal Framework**

The legislations relevant for environmental assessment for EARN Project components are the Environmental Conservation Act 1995 (ECA'95) and the Environmental Conservation Rules 1997 (ECR'97). Other key applicable national policies, strategies, plans, acts, rules and regulations laid out by the Government of Bangladesh have been collated in the Chapter 2. As part of a government entity, DYD is obliged to abide by all these acts, rules and guidelines (legal framework). As per ECR'97, most the components/sub-components and associated activities are likely to fall ranging under the '**Orange A**' category, only a few (e.g., construction of DYD HQ in Dhaka, renovation/reconstruction of multi-storied buildings at 64 Youth TCs (YTCs) and 6 regional TCs, laboratory setup at YTCs, some potential trades - repairing of refrigerators/PVC, dairy/poultry/cattle farms, food processing, etc.) falls under '**Orange B**' category, as has no such significant impact on the surrounding environmental and social components, likely to have localized and reversible environmental and social impacts demands E&S screening and environmental management plan (EMP), based on which only a few demands further environmental assessment (EA). The project requires to conduct screening for all activities/schemes and prepare site specific EMP at the initial stage and based on screening result, and if recommended by Department of Environment (DoE), initial environmental examination (IEE) and EMP should be carried out.

### **Application of the World Bank E&S Standards and Guidelines**

The World Bank's ESF 2016 consisting of ten (10) Environment and Social standards (ESSs) set out their requirements for the DYD/MoYS relating to identification and assessment of environmental and social risks and impacts associated with the project activities. These ESSs will also be applied on the technical assistance activities to be co-financed by other DPs including the Asian Infrastructure Investment Bank (AIIB) likely to co-finance the project.

**Applicable ESSs.** The World Bank ESSs applicable for the project activities are ESS1 (Assessment and Management of Environmental and Social Risks and Impacts); ESS2 (Labor and Working Conditions); ESS3 (Resource Efficiency and Pollution Prevention and Management); ESS4 (Community Health and Safety); ESS7 (Indigenous Peoples); and ESS10 (Stakeholder Engagement and Information Disclosure). An E&S Management Framework (ESMF) has been prepared responding to the requirements of the applicable ESSs. This ESMF will be followed for E&S screening of each relevant activities/sub-projects and managed during project implementation. Outcome of the screening process will determine the level of detail of E&S

assessment (ESA) i.e., E&S impact assessment (ESIA) and E&S management plan (ESMP). ESMF provides guidance for meaningful consultation with tribal communities (with indigenous status or origin) and a social inclusion and management framework (SIMF) addressing the varied needs and capacity of the disadvantaged and vulnerable individuals and groups including tribal peoples. A framework Labor Management Procedure (LMP) has been prepared, following which site-specific detail labor management plan will be prepared during project implementation. A Stakeholder Engagement Plan (SEP) has been prepared that identifies stakeholders and includes strategies for meaningful consultation with disadvantaged and vulnerable individuals, groups and communities during project implementation. The ESMF, LMP and SEP will guide preparation of site-specific E&S management plans (ESMPs). A proper Gender and SEA/SH Action Plan (GSEAP) will be prepared gender inclusion and for SEA/SH risks management and attending any relevant incidents.

**ESSs not relevant to the project.** The project approach is to avoid land acquisition and population displacement and all activities will be executed within existing premises of DYD and therefore ESS5 (Land Acquisition, Restriction on Land Use and Involuntary Resettlement) and EES6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources) are not relevant to this project. ESS8 (Cultural Heritage) is not relevant as the project will avoid activities and locations near culturally sensitive areas. However, the ESMF includes a Chance Finds Procedures to illustrate the course of action to be taken in case any culturally significant objects/practices are identified during implementation. ESS-9 (Financial Intermediary) does not apply as there is no financial intermediary involved.

The World Bank guidelines and guidance notes relevant to the applicable ESSs, general environmental and health safety, climate change, labor influx, gender and GBV (SEA/SH) and incident response have also been consulted for preparing this ESMF.

### **Gap Analysis of World Bank Requirements and National Laws**

A gap analysis between WB's ESSs and GoB Regulations was conducted as part of the E&S capacity assessment of the DYD/MoYS. The results of the gap analysis indicated that the E&S risk assessment and management system for development projects in Bangladesh is open-ended but does not cover all the requirements of the World Bank E&S Standards. The ECA/ECR does not even define the scope of the ESA study (or the IEE), leaving it to the ESIA to determine the scope through initial assessment/screening. The coverage of the ESA study therefore would depend on the expertise of the ESIA team or the DoE reviewers. There is no assurance that each E&S Standard is considered in the ESIA and the formulation of the ESMP. Although the DoE's EIA requirement is heavy towards the environmental aspects, more and more social issues need to incorporate in the ESA under ESSs. Moreover, the practice under normal circumstances does not include labor management issues. Another critical gap pertains to lack of provisions for requiring the preparation of project-specific E&S management plans. The national legal framework for land acquisition, as of now, does not require the preparation of resettlement plan. DoE's EIA doesn't have strong requirement to assess the risk on social inclusion, gender, and gender-based violence (GBV) including sexual exploitation and abuse and sexual harassment (SEA/SH). Given the gaps (Table 2.2 under Chapter 2), this ESMF will follow the most stringent standards and requirements.

### **Risk Categorization and Impact Assessment and Prediction**

The main anticipated E&S risks and impacts of the project, given the scale of works within existing footprints, mostly related to construction/renovation related impacts such as occupational and

community health and safety, noise, vibration, tree cutting, dust pollution and construction and solid waste generation and management. So, impacts are expected to be minor, localized and manageable. Considering the scale of civil works and the capacity of the implementing agency and partners, the overall **environmental and social risk of the project has been rated as ‘Moderate’ per World Bank ESF**. However, while the works packages would be ready by the appraisal but exact locations of the activities for civil works, stakeholder institutions, and beneficiaries targeted for project support will be determined during implementation. Hence, E&S risks and impacts of the activities to be undertaken will be known at the implementation level only (an overview is given in Chapter 3).

Due to the nature of the proposed activities and their potential E&S impacts, the project activities are fallen under ‘Orange A and Orange B’ category according to Bangladesh ECR 1997, which requires initial E&S screening, in some cases detail IEE, and execution of EMPs.

### **E&S Management Principles**

Considering the risk assessment and potential impacts of the Project at preparation, the following principles will be applied for E&S risks management in the planning and implementation of the project activities:

- 1) The project will manage the associated E&S risks and impacts responding to the requirements of the national legal and regulatory framework, and the applicable World Bank ESSs and guidelines, as identified in this ESMF. The ESMF will guide to ensuring E&S compliance and inclusion of all communities irrespective of their ability to access the project benefits.
- 2) The Project – for implementation of infrastructure works – will be obtaining environmental clearance from the Department of Environment (DoE), local government agencies and the World Bank as required, to coordinate with the implementation partners, DPs, NGOs, CSOs and stakeholders in the process.
- 3) E&S Screening, IEE/ESIA and ESMP (where required) will be prepared for activities as determined by DoE and guided by the ESMF. In case, requirements of DoE’s guideline differ from those of WB ESF, the more stringent standards and requirements will apply.
- 4) Environmentally sensitive areas, cultural heritage sites, restricted or disputed lands (if identified during project implementation) should be avoided, if cannot be arranged amicably on informed consent. In case of cultural heritage sites/resources identified during civil works, securing the area, informing the DYD, decide on preservation method as per expert opinion and keep the find secret if it is for the interest of the find.
- 5) Participation of stakeholders (especially local communities) should be ensured by the PMU in planning, implementation, and monitoring of sub-project activities. PMU will inform project stakeholders about project interventions and its potential impacts on the surrounding environmental and social elements.
- 6) PMU will ensure appropriate institutional set up for implementing ESMPs and inter-agency coordination. PMU will also ensure that bidding documents for contractors have specific clauses to ensure implementation of ESMPs, as required.
- 7) Contractors to be engaged in construction/renovation/expansion/repair and maintenance workers under the project should be provided with First Aid Kits at camp/work sites with adequate

drinking water and sanitation facilities. Worker's/crew's health and safety measures shall be ensured, and use of personal protective equipment (PPE) shall be required.

- 8) Subproject activities with the following environmental and social attributes will not be eligible for implementation under this project:
  - E&S impacts identified in IEE/ESIA categorize the project to substantial or high risk (according to ESF).
  - Requiring land acquisition, involuntary physical displacement, or result in loss of livelihoods of peoples.
  - Associate adverse impacts on the small ethnic communities with indigenous status as per the World Bank ESS7.
  - Associate significant environmental impacts, including those that significantly increase greenhouse gas emissions and impact of natural habitats and biodiversity.
- 9) In the circumstances when alternatives are not available for avoiding displacement of formal and informal users of property for critical project activities, DYD will discuss with the World Bank for terms following the standard on involuntary resettlement (ESS5).

### **Project Implementation Arrangement**

The overall responsibility for the project will lie with the MoYS, DYD will be the implementing agency (IA). DYD will be supported by an inter-ministerial Project Steering Committee (PSC) for policy guidance and oversight, and at a working level, by a Project Implementation Committee (PIC) for administrative guidance. A dedicated Project Management Unit (PMU) will be established at the DYD. The PMU, headed by a Project Director (PD), will be responsible for day-to-day project implementation supported by an Additional Project Director (APD), and adequate technical staff and consultants in key areas. Project implementation will incorporate a number of implementing partners both from public and private sectors, such as, procured Service Providers (SPs), Bangladesh Open University (BOU), and Local Government and Engineering Department (LGED).

Field level activities will be implemented in partnership with the private sector SPs, which includes, non-governmental organizations (NGOs) and civil society organizations (CSOs). These Service Providers (SPs) will be competitively selected by DYD. Upazila Coordinators (UC) from the SPs will be responsible for supervising the field level implementation of the project components. At least 50% of the UCs will be women. Construction and rehabilitation of major infrastructure for DYD and MIS support for the project will be provided by LGED under a Memorandum of Understanding (MOU) with the PMU. BOU will implement the Reaching the Skill Ladder sub-component under a MoU with the PMU.

Besides, District Youth Centers (DYC), National Sports Council (NSC), Bangladesh Kriya Shiksha Protisthan (BKSP), Sheikh Hasina National Institute of Youth Development (SHNIYD) will be supported through an Implementation Development Grant (IDG) from the Project.

The SPs will be responsible for establishing and managing training centers/venues and operating training for the NEET youth.

### **Institutional Capacity in Project E&S Management**

The MoYS and its implementation partners, except LGED, have no prior experience of implementing World Bank financed projects. They are again, new to the World Bank ESF requirements and procedures. The DYD at the central level neither screens projects for IEE or ESIA as per ECR 1997 provisions nor obtain

environmental clearance certificate (ECC) from the Department of Environment (DoE). However, LGED has a dedicated unit to systematically manage E&S compliance of their projects. LGED has long experience of implementing infrastructure projects in Bangladesh following the E&S guidelines of the international finance institutions including the World Bank. Since, major construction/renovation of buildings will be carried out through LGED, lack of institutional capacity of the DYD would not have major inference on managing E&S risks and impact responding to the ESF requirements.

### **Institutional Arrangement for Project E&S Management**

DYD of the MoYS will create a Social, Environmental and Gender Cell (ESG Cell) within the PMU for the Project. The ESG Cell will be headed by a Deputed Project Director (DPD) level official appointed by the PD, and he/she will be responsible for the implementation of all ESF instruments including the ESMF along with the LMP, SEP and GSEAP, and their compliance monitoring. Head of the ESG Cell will be technically supported by full-time consultants at the PMU consisting of one Environmental Specialist, one Social Development Specialist, one Gender and SEA/SH Specialist, and one Communications and Participation Specialist. ESG Cell consultants will manage, guide, supervise and monitor implementation of ESMF, SEP, LMP and GSEAP per ESCP and ensure compliance following both World Bank and Government requirements. The procured Service Providers will also have E&S staff responsible to look after the E&S compliance management and monitoring. The implementation partners at division level will also provide support for E&S management in subproject processing.

### **Environmental and Social Assessment and Management Process**

- The E&S experts at ESG Cell under the PMU will provide technical backstopping and coordination support through the Service Providers at the divisions to perform the environmental and social screening including assessment of social risks like SEA/SH, discrimination, and elite capture, and develop site/activity specified in the ESMP. The relevant focal persons of the Service Providers will start the task during the initial stage of project implementation.
- E&S assessment including screening and impact assessment is inevitable for all the relevant activities/subprojects including trades/entrepreneurship support, reconstruction/construction of buildings, innovation activities by the NGOs, CSOs, industries, etc. before execution.
- The E&S, Gender and GBV consultants at ESG Cell will conduct verification of some of the screening and assessment reports through field visits and consultation with beneficiary communities and the targeted NEET youth.
- E&S requirements identified in the site-specific ESMP will be a binding part of the bidding/contract documents of the financial assistance recipients of trades/entrepreneurships. ESG Cell, through Service Providers at each division, will ensure inclusion of the E&S clauses in their contract documents.
- If E&S screening identifies any activities that require further E&S assessment, the responsible implementation partner will engage an independent E&S consultant to generate a detailed E&S baseline of the sub-project, develop ToR for E&S assessment and provide guidance in conducting IEE (if recommended by DoE) and/or ESIA and ESMP. PMU will ensure adequate budgetary provision for E&S compliance of the activities implemented by the implementation partners including the service providers.
- PMU will be responsible to share/submit the IEE ToR and IEE report to DoE for Clearance. They will review and clear screening and environmental assessment reports made by the

implementation partners before submitting for DoE clearance and provide necessary technical inputs.

- ESG Cell consultants through relevant staff of implementation partners will ensure that environmental and social considerations are given enough attention, weight, and influence over selection of trades, construction/renovation and improvement of infrastructures. all over the country.
- All the activities of the EARN Project will follow the Environmental Code of Practices (ECoPs) prepared under ESMF.
- The project will ensure that environmental and social impact assessment addresses all potential environmental and social direct and indirect impacts of the project throughout its life: identification, design and implementation stages; and suggest appropriate mitigation measures. If any additional impacts are identified, IEE/ESIAs and ESMP will be reviewed and updated.

### **Inclusion of ESMP Requirements in Contract Documents**

Site specific ESMPs of the project should include a section on special E&S clauses to be incorporated in the Tender Document/ToR of the contractors/SPs under General/Particular Specification. These clauses are aimed at ensuring that the Contractor/SP carries out their responsibility of implementing the E&S management plan (ESMP), monitoring plan as well as other environmental, social, health and safety measures also covering discrimination and gender-based violence (GBV) including sexual exploitation and abuse (SEA) and sexual harassment (SH). Such clauses may specify, for example, workers Code of Conduct (CoC), penalties for non-compliance as well as incentives to promote strong compliance. Contractors/SPs must be made accountable to implement the plans and mitigation measures which pertain to them through contract documents and/or other agreements of the obligations and importance of the environmental and social components of the project. In addition, contractors will be asked to prepare a site-specific C-ESMP (Contractor's ESMP) to encompass all of the detailed site-specific plans, measures and management systems they are required to develop and implement, to be based on the ESMF recommendation and IEE/ESIA findings, their work methodology, work force involvement, equipment's standard, and work scheduling.

### **E&S Management of Potential Trades/Entrepreneurships**

The project will provide skills training followed by financial assistance on the different selected green trades and entrepreneurship development. All the trades/financial assistance to the potential entrepreneurships will be subject to E&S screening process. Results from the initial discussion at the project preparation stage revealed that the training modules of the existing trades are not designed to cover environment and social management procedures and its requirements. E&S management procedures will be included in the training modules covering E&S issues of the trades, potential impacts on the environment and people, legal and policy requirements and impact management procedures. Site specific ESMPs will be integral part of the contract agreements with the seed finance receivers/entrepreneurships.

### **E&S Management of Innovation Grants**

The EARN project will call for proposals from the NGOs, organizations, academic institutions, and other CBOs on innovative ideas/proposals to engage the NEET youth of the communities those are hard to reach with common approaches e.g., tea garden workers, and the poor in coastal islands, hill tracts, chars/haor, etc. None of these innovations should include any activities prohibited by the negative list of the EARN

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Project, thus each of the selected innovation must go through the E&S screening process, and the ESMP will be an integral part of the agreement and terms of engagement. PMU with the help from its ESG Cell will be responsible entity to ensure E&S monitoring during implementation of the Innovative Grants.

### **E&S Management in Laboratories/Workshops [need to check with PAD and the Team]**

EARN project will construct/renovate some Laboratories/Workshops (that generates potential chemical, biological and e-waste) for some of the YTCs to provide specialized trainings on selected trades. Standard Lab Safety Protocol will be prepared and implemented by the respective YTC approved by the DYD and other respective authorities following the ECoPs and WHO's guideline for standard lab safety protocol. The plan will be submitted for review and approval before the laboratories/workshops come into operation.

### **Management of Vulnerable and Disadvantaged Peoples**

The project will establish mechanism at the YTCs and other sub-project levels to address risks of forced labor, child labor, discrimination, and SEA/SH. A social inclusion and management framework (SIMF) has been included in this ESMF and measures recommended will be included in the ESMPs for works packages and training programs influencing vulnerable and disadvantaged communities. The SIMF provides guidance in identification of vulnerable NEET youth in ethnic groups and other vulnerable and disadvantaged communities, engaging with them inclusively in development dialogue and developing measures to maximize subproject benefits to them. The project will identify these people with special needs for their age, gender, ethnicity, religion, physical, mental or other disability, sexual orientation, poverty and indigenous status including any challenges in their participation in subproject process and ensure non-discrimination to access project benefits.

### **Community Health and Safety Measures**

The Contractors shall ensure the health and safety of the community around project sites. All schemes and sub-schemes including civil construction, renovation, repair buildings and sheds, installation of water supply & sanitation facilities, shall be inspected by Implementation Partners, Service Providers and respective representatives of ESG Cell to assess any risks or hazards associated. After inspection, the competent professionals from ESG Cell shall certify which shall reflect on the risk of adverse consequences posed by the nature and use of the structural elements and the natural conditions of the area. ESG Cell - shall put in place quality management systems to anticipate and minimize any risks and impacts that may have on community health and safety including communicable diseases/COVID-19, traffic management and safety on roads to the sites.

### **ESMF Implementation Cost**

Estimated cost has been prepared for assessment, management and monitoring of E&S risks and impacts at the implementation stage. The cost estimates for some of the mitigation measures to be identified in the ESMP will be part of civil works contract. Some of suggestive activities from screening/IEE will be implemented by hiring experts (if required). The Development Project Proposal (DPP) of EARN Project will reflect the E&S management activities with sufficient budget allocation. The budget will also cover operation and regular E&S compliance monitoring by the PMU through the ESG Cell consultants. Total BDT 118.6 million is estimated for implementation of ESMF, LMP, SEP and GSEAP, which will be embedded in the total project cost to be met from counterpart finance by the Government.

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## Stakeholder Consultation and Disclosure

As part of the ESMF preparation, several stakeholder consultations were carried out in different districts and target areas; all of them were in person consultations while the team visited the project sites and discussed with the potential beneficiaries. During the consultations the people were informed about project objectives and components, E&S risks, application of national legal framework and the World Bank ESF, and other corporate requirement for sustainable project outcomes.

The Consultations elicited from the people the following issues like likely social impacts (benefits and risks), measures to harvest the best possible outcomes, means of better delivery and assistance, assurance from the project authority to include marginalized people and provisions related to safety of women and girls of sexual harassment, exploitation and abuse.

Through public participation, stakeholder's viewpoints and suggestions were captured as an input to the ESMF. A separate stakeholder engagement plan (SEP) has been prepared for this project to engage with the communities and stakeholders for their views and inputs at the implementation level.

The ESMF, LMP and SEP prepared and adopted for the project at appraisal in concurrence from the World Bank will be the bases for policy principles, and site-specific E&S screening, IEE, ESIA/ESMP will be the bases for E&S compliance at the implementation level. The ESMF, SEP and LMP prepared for the project have been disclosed before appraisal including translations of summary of these documents. These reports in hard cover including any E&S plans developed at the implementation level will kept at the division and the district level offices of DYD and the implementation partners open for public.

## Grievance Redress Mechanism (GRM)

The project will establish a Grievance Redress Mechanism (GRM) – built on the centralized Grievance Redress System (GRS) of the Government (<https://www.grs.gov.bd/>) – for addressing grievances and complaints received from the target group beneficiaries, any project affected parties (PAPs), other interested parties and stakeholders on any implementation issues including E&S impacts and risks of SEA/SH. A three-tier grievance redress mechanism has been proposed for the affected people and other stakeholders (Project GRM) under this project to address all grievances/claims and allow the people to go to the upper level or to the courts of law for seeking justice. The GRM will be at community level, project level and MoYS level. A separate GRM for the construction workers (Worker GRM) has also been formulated which will be activated at the construction sites to address complaints/grievances of the laborers. A specialized GRM has been designed with protocols for attending complaints related to incidents of SEA/SH at project sites including civil works sites, training venues, offices of the implementation partners, site camps and contractors camp and offices and community areas. Detail of the GRM structure and processes have been discussed in the stand-alone SEP and LMP for this project.

## Social Inclusion and Management

The social inclusion and management framework (SIMF) has been included in the ESMF for managing inclusive targeting, selection, and management of NEET youth in program operations (discussed in Chapter 6). The SIMF will help DYD in minimizing exclusion, discrimination and vulnerabilities of the NEET youth to exploitation and harassment including sexual exploitation and abuse (SEA) and sexual harassment (SH). The SIMF provides broader principles for safe working and training environment for women and girls and protocols for attending SEA/SH complaints with due sensitivity of the issues. A Gender and SEA/SH Action Plan (GSEAP) will be adopted for the project to manage these risks and issues at the implementation level.

The project will adopt an inclusive approach for targeting and selection of NEET youth from all social, economic, and spatial groups of the project area communities. The project will promote an enabling environment for socio-economic inclusion of the target group, especially women and girls, by helping to ease the social barriers through greater community engagement and ownership; and enhance institutional capacity of public and private sector actors. Social inclusion and management plan (SIMP) will be prepared for each target Upazila addressing the varying needs and capacity of communities including the tribal peoples and communities from other vulnerability and disadvantaged groups. Project grievance mechanism will accommodate any traditional complaints handling arrangement of the tribal communities including those with indigenous status as per ESS7.

### **E&S Monitoring and Evaluation Plan**

Activities managing E&S risks and impacts including gender, labor and GBV issues will be monitored by a third party. However, DYD with all its implementation partners and service providers will establish internal monitoring system for day-to-day oversight and monitoring of E&S activities. A two-tier monitoring program is proposed for site specific ESMPs comprising compliance monitoring and effects monitoring:

#### *Compliance Monitoring*

The purpose of the compliance monitoring is to ensure that the contractor implements the mitigation measures given in the ESMP are effectively and timely implemented. This monitoring will generally be carried out by the ESG Cell with the help of checklists to be prepared following the mitigation with the ESMP.

#### *Effects Monitoring During Project Implementation*

Effects monitoring is a very important aspect of environmental and social management to safeguard the protection of both environment and people. While the ESG Cell is responsible for effect monitoring during the project implementation, each partner NGO headed by a Coordinator under the Project Director/EARN will be formed in each division consisting of other members like E&S Consultants. The monitoring will comprise surveillance to check whether the contractor is meeting the provisions of the contract during construction and operation of the program including the responsible agencies for implementation and supervision.

Environmental and social monitoring reports will be prepared by the PMU with inputs from the implementation partners including the service providers on a quarterly basis. The SEGC will conduct oversight of the activities of all implementing partners on E&S compliance following the project ESMF, SEP, LMP and the SEA/SH Action Plan also covering grievance response.

## List of Acronyms

AIIB	Asian Infrastructure Investment Bank	EZ	Economic Zones
APD	Additional Project Director	FGD	Focus Group Discussion
ASSET	Accelerating and Strengthening Skills for Economic Transformation Project	FIDIC	Department of Inspection for Factories and Establishments
BBS	Bangladesh Bureau of Statistics	FPIC	Free, Prior, and Informed Consent
BCCSAP	Bangladesh Climate Change Strategy and Action Plan	GBV	Gender Based Violence
BDT	Bangladeshi Taka	GSEAP	Gender and SEA/SH Action Plan
BKSP	Bangladesh Kira Shikkha Protishthan	GED	General Economic Division
BMET	Bureau of Manpower, Employment and Training	GHG	Green House Gases
BOU	Bangladesh Open University	GoB	Government of Bangladesh
BTEB	Bangladesh Technical Education Board	GRC	Grievance Redress Committee
CBP	Capacity Building Plan	GRM	Grievance Redress Mechanism
CERC	Contingency Emergency Response Component	GRS	Grievance Redress Service
CESMP	Contractors Environmental and Social Management Plan	HIV	Human Immunodeficiency Virus
CFP	Chance find procedure	HQ	Head Quarter
CG	Community groups	IA	Impact Assessment
CHSP	Community Health and Safety Plan	ICT	Information and Communication Technology
CoC	Codes of Conduct	IDA	International Development Association
COVID-19	Coronavirus Disease	IDG	Institutional Development Grant
CSO	Civil society organizations	IDP	Institutional Development Plan
DGHS	Directorate General of Health Services	IEE	Initial Environmental Examination
DIFE	Department of Inspection for Factories and Establishments	IFC	International Finance Corporation
DOE	Department of Environment	ILO	International Labor Organization
DP	Development Partner	INGO	International Non-government Organization
DPD	Deputy Project Director	IPF	Investment Project Financing
DYC	District Youth Centers	IPVDCF	Indigenous/Tribal Peoples and other Vulnerable Community Development Framework
DYD	Department of Youth Development	IT	Information Technology
E&S	Environmental and Social	LGED	Local Government Engineering Department
EA	Environmental Assessment	LMP	Labor Management Procedure
EARN	Economic Acceleration and Resilience for NEET Youth Project	M&E	Monitoring and Evaluation
ECA 1995	Environmental Conservation Act 1995	MIS	Management Information System
ECC	Environmental Clearance Certificate	MoE	Ministry of Education
ECOP	Environmental Code of Practices	MoHFW	Ministry of Health and Family Welfare
ECR 1997	Environmental Conservation Rules 1997	Mol	Ministry of Industries
EDT	Enterprise Development Training	MoSW	Ministry of Social Welfare
EHS	Environmental Health and Safety	MOU	Memorandum of Understanding
EIA	Environmental Impact Assessment	MoYS	Ministry of Youth and Sports
EPZ	Export Processing Zones	MTC	Mobile Training Centers
ESA	Environmental and Social Assessment	N/A	Not Applicable
ESCP	Environmental and Social Commitment Plan	NAPA	National Adaptation Plan for Action
ESF	Environmental and Social Framework	NARI	Northern Areas Reduction of Poverty Initiative
ESIA	Environmental and Social Impact Assessment	NEET	Not in Education, Employment, or Training
ESMF	Environmental and Social Management Framework	NGO	Non-government Organization
ESMP	Environmental and Social Management Plan	NSDA	National Skills Development Authority
ESS	Environmental and Social Standards	NTVQF	National Technical and Vocational Qualification Framework
		OHS	Occupational Health and Safety
		OHSP	Occupational Health and Safety Plan
		PBC	Performance Based Conditions

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PD	Project Director	SEP	Stakeholders Engagement Plan
PDO	Project Development Objective	SH	Sexual Harassment
PIU	Project Implementation Unit	SHNIYD	Sheikh Hasina National Institute of Youth Development
PMC	Project Management Consultant	SIMF	Social Inclusion and Management Framework
PMIS	Project Management Information System	SOP	Standard Operating Procedure
PMU	Project Management Unit	SSC (Voc)	Vocational Secondary School Certificate
PPE	Personal Protective Equipment	STEP	Skills and Training Enhancement Project
PPP	Public and Private Partnership	TA	Technical Assistance
PPSD	Project Procurement Strategy for Development	TLM	Teaching-learning Materials
PSC	Project Steering Committee	TMIS	Training Management Information System
PTG	Per-Trainee Grant	TOR	Terms of References
PVC	Polyvinyl Chloride	TSC	Technical School and College
PWD	People with Disabilities	TVET	Technical and Vocational Education and Training
QLEAP	Quality Learning for All Program	UC	Upazila Coordinators
RAISE	Recovery and Advancement of Informal Sector Employment Project	US\$	United States Dollar
RAP	Resettlement Action Plan	UYIC	Union Youth Information Centers
RPF	Resettlement Plan Framework	VLTC	Village Level Training Center
RPL	Recognition of Prior Learning	VLTTTC	Village Level Technical Training Center
SDP	Skills Development Plans	WB	World Bank
SEA	Sexual Exploitation and Abuse	WHO	World Health Organization
SEA/SH	Sexual Exploitation and Abuse/ Sexual Harassment	YED	Youth Entrepreneurship Development
SEB	Socio-Emotional and Behavioral	YTC	Youth Training Centers
SIMP	Social Inclusion and Management Plan		
ESG Cell	Environmental, Social and Gender Cell		

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## Chapter 1: INTRODUCTION

### 1.1 Background

The Government of Bangladesh (GoB) has requested financing from the International Development Association (IDA) of the World Bank (WB) to support the preparation and implementation of the 'Economic Acceleration and Resilience for NEET Project (EARN Project, the Project hereafter) through the Ministry of Youth and Sports (MoYS). Department of Youth Development (DYD) has been assigned by MoYS for preparation and implementation of the Project. The Project is designed to help the GoB establishing a holistic system, with greater focus on women, to enhance NEET youth's access to skills development, education and labor market opportunities for wage and self-employment. These will benefit achieving national target of reducing the share of NEET youth population in Bangladesh. The project finance from the World Bank is expected through Investment Project Financing (IPF) on IDA terms. The MoYS through DYD will have overall responsibility for the implementation of project activities including environmental and social (E&S) risks management. MoYS will explore possibility of partnering with agencies with good track record of carrying out infrastructure works and managing key project activities, such as, Local Government and Engineering Department (LGED) and Bangladesh Open University (BOU). Besides, field level activities will be implemented in partnership with the private sector, non-government organizations (NGOs) and civil society organizations (CSOs).

Total estimated cost of the project is US\$ 364 million of which IDA's financing will be USD 354 million, and GoB funding is US\$ 10 million. The project will thus leverage technical resources from other Development Partners (DPs), in the form of technical assistance, and in areas where the EARN project would complement ongoing activities supported by DPs. Duration of the project is five and half years, will be implemented from 2023 through 2028.

The project development objective is ***to (i) increase access to education, skills training and promote employability of the NEET youth, especially for women, in selected rural areas, to accelerate reduction of share of NEET youth in Bangladesh, and (ii) in case of an Eligible Crises or Emergency, respond promptly and effectively to it.*** With this PDO, firstly, the project will establish a mechanism for identifying eligible NEET youth from selected rural areas for different types of supports. Secondly, the project will create and facilitate access to relevant skills development as well as continuing or second-chance education for the identified eligible rural NEET youth, especially women. The skills development facilities will be responsive to barriers women face in terms of their locations, safe and inclusive infrastructure and learning environment, flexible course timings, free choice of trades, child-care facilities/options, and gender of instructors as well as identifying role models. Thirdly, the beneficiaries will receive trainings in enterprise development and Socio-Emotional and Behavioral (SEB) skills development, as well as support in access to seed financing, linkages with employers and the labor market, and employment. Last but not the least, the project will create an enabling environment for socio-economic inclusion of youth, especially women, by helping to ease the social barriers; and enhance institutional capacity of state and non-state actors.

The World Bank Environmental and Social Framework (ESF) will apply to the EARN Project in addition to national legislative requirements on environmental and social management. This Environmental and Social Management Framework (ESMF) has been prepared as per requirements of the applicable legal and policy framework of the Government of Bangladesh and the World Bank.

## 1.2 Purpose of the ESMF

The ESMF is intended to be used as a practical tool during formulation, design, implementation, and monitoring of components and sub-components of this project. This document will be followed during project preparation and implementation for ensuring environmental and social integration in planning, implementation, and monitoring of project supported activities. For ensuring good environmental and social management in the proposed EARN project, the ESMF will provide guidance on pre-investment works/studies (such as environmental and social screening, environmental and social assessment, environmental and social management plans, etc.), provide set of steps, processes, procedures, and mechanisms for ensuring adequate level of environmental and social consideration and integration in each investment in the project-cycle. The document describes the principles, objectives, and approaches to be followed to avoid, minimize, or mitigate adverse impacts. The ESMF will facilitate compliance with the Government of Bangladesh's policies, acts and rules as well as with the World Bank's environmental and social standards (ESSs) of the Environmental and Social Framework (ESF), and guide to prepare and conduct the detailed ESA/IEE/ESIAs/ESMPs of the later stages of the EARN Project as appropriate to the project components/sub-components.

## 1.3 Project Description

### 1.3.1 Project Coverage/Location

The project will cover selected rural and semi-urban regions. A total of 250 upazilas (out of 506) are selected based on the following criteria: (i) vulnerable upazilas (Poverty-prone, hard to reach, tea garden, hill-tracts, natural disaster-prone and struggling areas such as, Cox's Bazar); (ii) Upazilas with high share of NEET youth (as identified by the Bangladesh Bureau of Statistics (BBS), General Economic Division (GED) and Directorate of Youth Development (DYD) surveys); (iii) high potential upazilas (upazilas with a relatively high share of NEET youth despite high overall employment rate, upazilas adjacent to Export Processing Zones (EPZs), Economic Zones (EZs) and designated industrial zones). A list of selected Upazilas is given in the Annex 01.

### 1.3.2 Project Components

EARN Project will be implemented through following Five components:

#### **Component 1: Enhance access to alternate education and relevant skills development opportunities (Tentative Costs: US\$115.58 million: IDA US\$115.58 million and GoB: 0)**

Component 1 aims at promoting access to skills development and continuing/second-chance education to reach the skill ladder for the rural NEET youth, especially female through (i) establishing village level training centers (VLTCs) with universal design and trades, especially suitable for women and PWDs; (ii) online training and offline assessment for selected trades; (iii) competitive financing for innovative initiatives for reaching the unreached; (iv) access to Open University centers in selected locations for the eligible secondary dropped outs to complete vocational secondary school certificate exams, known as SSC (Voc). The component will also aim at enhancing employability of the beneficiaries by providing Socio-emotional Behavioral (SEB) skills including communication training and Enterprise Development Training (EDT) including financial literacy. Component 1 has following two sub-components:

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**Sub-component 1.1: Promote access to skills development on market relevant skills including SEB and EDT (Tentative Costs: US\$85.23 million: IDA \$83.23 million and GoB: 0)**

The sub-component will support (i) beneficiary selection for promoting access to accelerated education programs required to reach at the skills ladder; (ii) creating a data base of the potential beneficiaries and maintaining the database; (iii) developing accelerated curriculum and relevant teaching-learning materials (TLMs), production and procurement of TLMs, teacher training, center management etc.; (iv) the establishing and managing an EARN Cell at the Open University including consultants, supervisors, transport and communication; and (v) Providing incentives to eligible beneficiaries (stipend, examination fees, Textbooks).

**Sub-component 1.2: Assist the secondary dropped-out NEET youth to reach the skills ladder (Tentative Costs: US\$30.35 million: IDA US\$30.35 million and GoB: 0)**

This sub-component will support: (i) beneficiary selection and categorization of the beneficiaries for diverse project supports; (ii) selection of local level trades; (iii) creation of a database of the potential beneficiaries and maintaining the database; (iv) provision of access to skills development, SEB and EDT for rural NEET youth, especially women, through establishing Village Level Training Centers (VLTCs); and (v) blended (online-offline) training and offline assessment on ten (10) selected trades;

**Component 2: – Promote support for wage and self-employment (Tentative Costs: US\$121.53 million: IDA US\$121.53 million and GoB: 0)** Through Component 2, EARN aims at increasing employment opportunities of the beneficiaries through (i) connecting the beneficiaries with local and national level employers; (ii) strengthening the existing seed financing mechanism of MoYS for potential entrepreneurs; and (iii) Internship and/or apprenticeship for selected trainees in eligible local and national enterprises. Component 2 has following two sub-components:

**Sub-component 2.1: Connect the beneficiaries with employers (Tentative Costs: US\$ 6.03 million: IDA \$6.03 million, and GoB: 0)**

This sub-component will support connecting eligible youths labor intermediation services to help them pursue wage employment. Key activities will include: (i) periodic job fairs and meet the employer events; (ii) enterprise visits by the trainees; (iii) a youth portal for the EARN beneficiaries and eligible NEET youth which will be linked with the existing job portals, business networks; (iv) internship/apprenticeship support for the eligible beneficiaries in eligible industries/firms.

**Sub-component 2.2: Post-training wage employment and entrepreneurship support (Tentative Costs: US\$115.50 million: IDA US\$115.50 million and GoB: 0)**

This sub-component will support guided seed financing for eligible beneficiaries and post-training employment, which will include investment incubation, mentorship, internship/apprenticeship by the following three steps:

**Sub-component 2.2A - Strengthen the DYD's seed financing mechanism (US\$40 million)** This sub-subcomponent will: (i) institutionalize the seed financing mechanism, selection process and monitoring, evaluation and reporting, and update the Seed Financing Operational Manual of the DYD/MoYS; and (ii) provide additional funds to the existing seed funds through Performance Based Conditions (PBC) to

expand seed financing facilities to eligible EARN beneficiaries. A Semi-Autonomous Youth Entrepreneurship Development (YED) Foundation will be established under the overall supervision of the MOYS and DYD as part of strengthening the existing seed financing mechanism.

**Sub-component 2.2B Technical Assistance (TA) (US\$2 million)**

This sub-subcomponent will specifically support PBC-financing related TA activities, capacity building of the proposed Foundation, strengthening DYD's seed financing mechanism entails substantial capacity building, and critical activities. TA will also be needed evaluate the PBC agreed annual targets for Seed Financing. Disbursements will follow transactions-based procedures.

**Sub-component 2.2C - Post-Training Specialization and Employment Support (US\$73.5 million)**

This sub-subcomponent will provide post-training employment support to eligible beneficiaries having undergone the needed training in a variety of activities deemed important to boost their potential towards their engagement in wage and self-employment. Disbursements will follow transactions-based procedures.

**Component 3: Promote Enabling Environment for NEET Youth (Tentative Costs: US\$22.81 million: IDA US\$22.81 million and GoB: 0)** Component 3 has three sub-components:

**Sub-component 3.1: Community Strengthening, Engagement and Ownership (Tentative Costs: US\$ 3.67 million: IDA \$3.67 million and GoB: 0)** This sub-component will support the formation of Community Groups to focus on NEET youth activities, their orientation and training, and ownership building, their continued engagement in youth activities. Community groups (CGs) will be established/created with help of the SPs through wide communication and awareness raising campaigns. At least half of the CG members would be female. CGs will facilitate community mobilization and awareness activities, participate in trade selection, beneficiaries' selection procedure, manage VLTCs, oversee monitoring and evaluation of the skills development and other activities, and establish community protection mechanism for preventing SEA/SH in training centers. CGs will arrange monthly *Uthan Baithak* (community meetings at local level), and stakeholder consultations.

**Sub-component 3.2: Awareness raising and community engagement to promote positive social norms (Tentative Costs: US\$12.35 million: IDA \$12.35 million and GoB: 0)** This sub-component will support (i) awareness raising programs with different levels of orientation, and intensity, through print, electronic and social media to encourage especially females to participate in skills development opportunities; (ii) engagement of CGs for promoting women participation, and (iii) preparation of materials for promoting the opportunities provided by EARN. Communication and awareness outreach agencies will be hired by the PMU. A media consultant will support the PMU to oversee the communication and awareness outreach programs. The subcomponent will also support celebration of national/international level events on special days (youth day, victory day, mothers' day etc.) at district, upazila and union levels by the community groups (CGs).

**Sub-component 3.3: Career counseling support, leadership development and positive youth engagement activities (Tentative Costs: US\$ 6.79 million: : IDA \$6.79 million and GoB: 0)** This sub-component will support: (i) psychosocial and career counseling support for NEET youth at Union, Upazila and District youth centers; (ii) psychosocial support through promoting youth participation in sports and

cultural activities, especially females; (iii) facilitating self-help groups; (iv) leadership development trainings through the registered youth clubs; (v) life skills training and interpersonal skills; (vi) raising awareness and putting in place preventive and mitigation measures for SEA/SH/GBV. In particular, it will support organizing counselling camps at UYICs, Upazila Youth Offices and District Youth Centers; sports materials and equipment as well as instruments and financing for sports and cultural activities in the educational institutions and youth clubs, financing upazila administration for arranging annual and semi-annual sports and cultural events, facilitating women self-help groups at the village level, leadership development training at the Youth Clubs and engaging the Youth Clubs in social awareness activities, such as anti-drug abasement campaign, awareness raising about human trafficking.

**Component 4: Enhance institutional capacity and Project Management (Tentative Costs: US\$104.08 million: IDA \$94.08 million and GoB: \$10 million)** Component 4 has two sub-components:

**Sub-Component 4.1: Support institutional capacity development for NEET youth Programs (Tentative Costs: US\$81.19 million: IDA \$81.19 million and GoB: 0)**

This sub-component will support: (i) establishment of a portal-based management, monitoring and reporting mechanism at DYD/MoYS; (ii) renovation and refurbishment of infrastructure; (iii) equipment for digital management (IT equipment etc.); (iv) digital payment and accounts management system; and (v) training for the officials on youth issues and global experience, Gender and GBV, digital management, IT and networking support, web-page management etc.

The support will include upgradation of the existing Management Information Systems (MIS) to ensure their interoperability and provision of reliable data for policy planning, implementation, and reporting; and portal-based mechanisms for tracking youth participation in project activities. This sub-component will also facilitate real-time monitoring through supporting transport facilities (motorbikes, rental cars), smart devices (linked to the portal), and data entry and management facilities and training to upazila level offices

The project will support agencies under DYD/MoYS to ensure enhanced outreach capacity of DYD/MoYS, overall management and supervision capacity as well as inclusiveness to the NEET youth. District Youth Centers (DYC), National Sports Council, Bangladesh Krira Shikkha Protishthan (BKSP), Sheikh Hasina National Institute of Youth Development (SHNIYD) will be supported through an Implementation Development Grant (IDG). IDGs will include (i) renovation/rehabilitation and upgradation of the existing infrastructure with access and other facilities for women and PWD; (ii) lab, equipment and materials for training; (iii) hired instructors from local and national industries; and (iv) development of communication and outreach activities and materials. In addition, stipend and other incentives for undertaking trainings/courses by the NEET youth at BKSP, SHNIYD will be supported under IDG. Implementation Development Grant will be prepared by the relevant institutions and will be approved by MoYS/DYD.

To enhance outreach capacity of DYD, this sub-component will also support establishment of Union Youth Information Centers (UYIC). UYICs will be established in every selected union preferably in the Union Parishad Building or in rented facilities. UYICs will: (a) serve as the information and coordination center for youth activities at the union level, (b) facilitate CGs, beneficiary and trade selection with assistance of the SPs, (c) monitor filed level activities and reporting entity; (d) connect the employers to the beneficiaries by arranging job fairs and employer meets; and (e) spread psychosocial activities in the

union. Officials of the UYICs will be recruited through out-sourcing mechanism. At least one out of three staff members of UYIC will be women.

The sub-component will also support establishment of a research cell at DYD. Supports will include office space, furniture and equipment, human resources including consultants (at least 30% women), relevant studies, surveys and dissemination and training. The research cell will be supported by the project until its closure, but at least one year before this, DYD will take necessary steps to institutionalize it within the MoYS structure.

**Sub-Component 4.2: Project Management, Communications, and Monitoring and Evaluation (Tentative Costs: US\$ 22.89 million: IDA \$12.89 million and GoB: \$10 million)** This sub-component will support (i) the establishment and operation of the Project Management Unit (PMU); (ii) the development and update of a long-term Youth Development Plan; (iii) preparation of Annual Sector Performance Report; and (iv) an effective monitoring and evaluation (M&E) system. This sub-component will also support impact evaluation for key project interventions, and coordination across relevant Ministries, agencies and non-government implementation partners SPs and communities. The Local Government Engineering Department (LGED) will provide MIS support (through an MIS Cell) to the project.

The project will be implemented by a dedicated Project Management Unit (PMU) to be established under the DYD. The PMU will be headed by a Project Director (PD) and an Additional Project Director (APD) supported by adequate, experienced technical staff and consultants, with preferably 30 percent women. The field level activities will be implemented in partnership with the private sector, non-government organizations (NGOs) and civil society organizations (CSOs). Upazila Coordinators (UC) will be responsible for supervising the field level implementation of EARN component.

Service Providers (SPs) and other implementation partners such as Communication Firm, IT firm, and Third-Party Evaluation Firms will be hired by the PMU, following World Bank procurement guidelines. PMU will also recruit an agency for recruiting project officials and support staff, UCs and UYIC staff.

### **Component 5: Contingency Emergency Response Component (Zero Allocation)**

A Contingency Emergency Response Component (CERC) is included under the project to ensure that funds can be reallocated in the event of an eligible crisis or emergency. In the event of such an emergency, this component would allow the Government to request the World Bank to re-categorize and reallocate financing from other project components to cover emergency response and recovery costs if approved by the World Bank.

### **1.3.3 Project Beneficiaries**

The project beneficiaries fall into three groups: first, NEET youths aged 15-19, who want to reach the skill ladder; second, young-adult NEETs aged 20-35 who seek to relevant skills and employability; and third, those excluded due to cultural norms or disabilities. A total of 1.2 million NEET youth would be directly benefited by the project activities. Skill development and assistance to reach the skill ladder would cover 1 million beneficiaries. An additional 0.2 million beneficiaries who received skill development trainings from ASSET and/or RAISE but remained NEET in the selected upazilas will receive Socio-Emotional and Behavioral (SEB) and Enterprise Development Training (EDT) training. All other supports (internship, seed

financing) will cover selected subsets of the 1.2 million project beneficiaries based on support-specific eligibility criteria. In addition, awareness raising programs, psychosocial supports and system-level capacity enhancement will benefit many more youth beyond the direct beneficiaries. The beneficiaries would include the NEET youth who meets the following criteria (i) aged 15-35 years aged youth who are not engaged in education and/or any income earning activities at least for 3 years; (ii) completed at least primary level of education; (iii) not covered by any other interventions (ineligible for access to ASSET, RAISE projects due to location, coverage, education level etc.

#### **1.4 Sectoral Background (in brief)**

As of 2018, around 47 percent of Bangladesh's population were below 24 years of age. The country will reach its lowest dependency ratio in two decades. An estimated 1.7 million new labor market entrants are expected every year until 2030, more than half of them are female. This large youth population and rapidly growing labor market can be the key to lift the country to its aspired upper-middle-income status. Substantial challenges, however, stand in the way of transforming this demographic advantage into a driver for economic growth. One major challenge is non-participation of a large share of youths in economic and educational activities, especially females. Overall unemployment rate is 3.1 percent in Bangladesh, while youth (aged 15-29) unemployment rate is 8.9 percent. More concerning is that 27.1 percent of the youth population, around 12.6 million (89.6 percent female), are categorized as NEET (Not in Education, Employment or Training). The main factors contributing to such a large population of NEET youths include barriers to access to and scarce supply of skills development opportunities, especially in remote areas and for low-educated youth, and causes related to ethnic background, disadvantaged groups, and social/gender norms challenges including movement restrictions. The overwhelming share of female NEET youth is a concern in a country where female labor force participation is 36.4% compared to 84.2% for men.

The COVID-19 pandemic has created multidimensional disruptions to the labor markets and income-generating opportunities, particularly for the youths. Informal employment, usually a safety net to cushion the impact of economic crises, was not spared as people's mobility was restricted for a long time. Adolescents and youths who had dropped out of education and lack relevant skills have been among the most affected. Many of the adolescents and youth have lost their jobs, required to take on more household chores and the children are less likely to return to school. Young women are also at high risk of engaging in unsafe and/or exploitative means of survival and subject to early marriage and domestic violence. The pandemic has also shifted short and medium-term demand for various occupations, while creating renewed occupations, such as caregivers, digital marketing specialists, and ICT professions. The shift in skills demand creates new opportunities to engage with NEET youth and connect them to gainful activities.

The Government of Bangladesh (GoB) has made skills development of the NEET youth a national priority, with a special emphasis on women and the disadvantaged. The Government's Eighth Five-Year Plan (8FYP – 2021-2025) sets an ambitious goal of reducing the share of NEET youth from 29 percent to 15 percent by 2025 and 5 percent by 2031 (goal set for 9th FYP). The skills development strategy of 8FYP calls for quality and diversified skills and livelihood training programs with greater participation of women and more active engagement of the private sector. The National Youth Policy 2017, aligned to Vision 2041, also recognizes the current constraints posed by the large share of the NEET youth for meeting the national targets on skills development as well as reaching upper-middle-income country status by 2031.

There are multiple initiatives of Government of Bangladesh (GoB) and national and international NGOs for skilling youth and creating employment opportunities for the unemployed youth; however, economic engagement of the NEET youth has remained largely unattended. First, cumulative coverage of all the initiatives is less than 1.5 million youths against the NEET youth population of 12 million. Second, no initiative takes a holistic approach to reach and support the NEET youth and ensure their economic engagement. Third, formal skills development is inaccessible to the uneducated or low-educated and hard-to-reach youths, especially rural females. Fourth, creating an enabling environment and supporting SEB skills development have remained largely absent.

### **1.5 Approach and Methodology of the ESMF**

The ESMF has been prepared following the standard methodology consisting of the steps listed below.

- Review of the program details and meeting/discussions with the IAs and I/NGOs, CSOs, etc.
- Review of the policy and regulatory requirements.
- Conduct reconnaissance field visit by groups of experts of WB and EARN Project Preparation team (responsible for preparing the project on behalf of DYD and MoYS) and initial scoping and screening to determine the key environmental and social parameters and aspects that are likely to be impacted by the program activities.
- Collect and analyze sectoral baseline data with the help of secondary literature review.
- Consult with the stakeholders including beneficiary/affected communities and developing the consultation process.
- Assess the potential and likely impacts of the project activities.
- Prepare an outline of the environmental and social management issues according to the requirements of the 10 ESSs of the ESF.
- Collecting E&S related basic environmental and social scenario information on the project tentative locations through DYD.
- Capacity assessment of the IAs on implementing WB ESF requirements to implement E&S compliances.

## Chapter 2: LEGAL, REGULATORY AND POLICY FRAMEWORK

### 2.1 National Environmental and Social Policy, Legal and Regulatory Framework

Key applicable national policies, strategies, plans, acts, rules and regulations laid out by the Government of Bangladesh have been collated in the following list. However, their key provisions, purpose, and relevance to the EARN Project connecting to the environment and social aspects are briefly discussed in Annex 02.

- Bangladesh Environmental Conservation Act (ECA), 1995; Amendments in 2010
- Bangladesh Environmental Conservation Rules (ECR), 1997
- Bangladesh Environment Court Act, 2010
- National Environmental Policy, 1992
- The Noise Pollution Control Rules, 2006
- Bangladesh Biosafety Guideline 2007
- Bangladesh Climate Change Strategy and Action Plan (BCCSAP), 2009
- National Adaptation Program of Action (NAPA), 2005
- Bangladesh Labor Act, 2006, (as amended 2018)
- Bangladesh Labor Rules, 2015
- Bangladesh Child Labor Mitigation Policy, 2010
- High Court directives on SEA/SH at workplace 2009
- Bangladesh National Building Code, 2006
- The Communicable Diseases (Prevention, Control and Eradication) Act, 2018
- The Water Supply and Sanitation Act (1996)
- National Land Use Policy, 2001
- National Policy for Safe Water Supply and Sanitation, 1998
- Bangladesh Water Act, 2013
- National Water Policy, 1999
- The Ground Water Management Ordinance (1985)
- Road Transport Act, 2018
- National Fisheries Policy, 1998
- The Protection and Conservation of Fish Act (1950)
- Protection and Conservation of Fish Rules (1985)

Other than the above, due to ongoing COVID-19 pandemic, World Health Organization (WHO) and Directorate General of Health Services (DGHS), under the Ministry of Health and Family Welfare, provided guidelines for infection prevention and control. The government has incorporated the life-threatening novel corona virus (COVID-19) in 'The Communicable Diseases (Prevention, Control and Eradication) Act, 2018'. With the notification of the gazette the government has a legal basis to take action against the people not following the government's direction that relates to COVID 19. Health and safety issues relevant to COVID-19 should be addressed with reference to ILO Occupational Safety and Health Convention, 1981 (No. 155), ILO Occupational Health Services Convention, 1985 (No. 161), ILO Safety and Health in Construction Convention, 1988 (No. 167), WHO International Health Regulations, 2005, WHO

Emergency Response Framework, 2017. Female labor, vulnerable groups' labor (e.g., persons with disabilities) are covered under this domestic legislation. The High Court Division of the Supreme Court issued a set of guidelines, on May 13, 2009, defining sexual delinquency to prevent any kind of physical, mental or sexual harassment of women, girls and children at their workplaces, educational institutions and other public places including roads across the country.

## 2.2 Applicable International Treaties Signed by the GoB

Bangladesh has signed most international treaties, conventions and protocols on environment, pollution control, bio-diversity conservation and climate change. A list of the relevant international treaties signed by GoB is furnished below, while a detail overview of the international treaties listed below is shown in Annex 03:

- Bonn Convention
- Convention on the Elimination of All Forms of Discrimination Against Women
- ILO Convention No 29 on Forced Labor
- ILO Convention no. 182 on Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor
- Indigenous and Tribal Populations Convention
- International Convention on Climate Changes (Kyoto Protocol)
- Migrant Workers (Supplementary Provisions) Convention
- Occupational hazards due to air pollution, noise & vibration (Geneva)
- Occupational Health services
- Occupational safety and health in working environment (Geneva)
- Prevention and Control of Occupational hazards
- Safety in use of chemicals during work
- UN framework convention on climate change (Rio de Janeiro)

## 2.3 Application of GoB Policies, Acts and Rules on EARN Project components and their Classification

The legislations relevant for environmental assessment for EARN Project components are the Environmental Conservation Act 1995 (ECA'95) and the Environmental Conservation Rules 1997 (ECR'97). In order to set an illustrative directive for abiding by the act, Bangladesh Government through the Environmental Conservation Rules '1997 and its subsequent amendments, as specified in rule 7(2), present a categorization of all the potential industrial interventions or projects into **four distinct types-Green, Orange A, Orange B and Red**, considering the site of the interventions and impact on the environment. The procedure and required documents for obtaining environmental clearance in favor of each category have also been presented by the DoE. As part of a government entity, DYD/MoYS and PMU of the EARN Project is obliged to abide by all these acts and rules, in addition of other GOB acts, rules or guidelines.

As per ECR'97, most the components/sub-components and associated activities are likely to fall ranging under the **'Orange A'** category, only a few (e.g., construction of DYD HQ in Dhaka, renovation/reconstruction of multi-storied buildings at 64 YTCs and 6 regional TC, laboratory setup at YTCs, some potential trades - repairing of refrigerators/PVC, dairy/poultry/cattle farms, food processing, etc.) falls under **'Orange B'** category, as has no such significant impact on the surrounding environmental and social components, likely to have localized and reversible environmental and social impacts demands E&S screening and ESMP, based on which only a few demands further EA like Initial Environmental Examination (IEE)/ESMP. **It is suggested that the project should conduct screening for all activities/schemes and prepare site specific ESMP at the initial stage and based on screening result, and if recommended by DoE, further IEE/ESMP should be carried out for specified activities.**

Environment clearance must be obtained by the respective implementing agency or project proponent (private sector) from Department of Environment (DoE). The environmental clearance procedure for Orange-A Category projects can be summarized as follows:

Application to DoE - Obtaining Site Clearance - Applying for Environmental Clearance - Obtaining Environmental Clearance - Clearance Subject to Annual Renewal.

## 2.4 Application of WB E&S Policies

WB's Environmental and Social Framework (ESF) consisting of ten (10) Environment and Social Standards (ESSs) set out their requirements for the DYD/MoYS relating to the identification and assessment of environmental and social risks and impacts associated with the project activities. The ESSs support the IAs in achieving good international practice relating to environmental and social sustainability, assist them in fulfilling their national and international environmental and social obligations, enhance transparency and accountability and ensure sustainable development outcome through ongoing stakeholder engagement. WB E&S policies will also be applied on the technical assistance activities to be co-financed by DPs of the EARN project (i.e., AIIB). Table 2.1 summarizes the ESS requirements and their relevance to the EARN Project components:

**Table 2.1 WB ESS requirements and relevance to the EARN Project**

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project activities
World Bank Environment and Social Framework (ESF) for Investment Project Financing	It sets out the mandatory requirements of the Bank in relation to the projects it supports through Investment Project Financing. The types of E&S risk and impacts that should be considered in the environmental and social assessment. The required E&S management plan as well as the use and strengthening of the Borrower's environmental and social framework for the assessment, development and implementation of World Bank financed projects where appropriate.	Applicable to the EARN Project and it's all activities.
ESS-1 Assessment and Management of	Identify, assess, evaluate, and manage environment and social risks and impacts in a manner consistent with the ESF. Adopt	Relevant. <b>According to the E&amp;S risk classification, EARN Project is rated 'Moderate'.</b>

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project activities
Environmental and Social Risks and Impacts	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	ESMF has been prepared, following which E&S screening will be carried out for each relevant activities/sub-projects during project implementation. Outcome of the screening process will determine level of detail ESA i.e., IEE/ESIA and ESMP, whichever required.
ESS-2 Labor-and-Working-Conditions	Promote safety and health at work. Promote the fair treatment, non-discrimination, and equal opportunity of project workers. Protect project workers, with particular emphasis on vulnerable workers. Prevent the use of all forms of forced labor and child labor. Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. Provide project workers with accessible means to raise workplace concerns.	Relevant. A framework Labor Management Procedure (LMP) has been prepared, following which site-specific detail labor management plan needs to be prepared during project implementation.
ESS-3 Resource-Efficiency-and-Pollution-Prevention-and-Management	Promote the sustainable use of resources, including energy, water, and raw materials. Avoid or minimize adverse impacts on human health and the environment caused by pollution from project activities. Avoid or minimize project-related emissions of short and long-lived climate pollutants/greenhouse gases. Avoid or minimize generation of hazardous and non-hazardous waste. Minimize and manage the risks and impacts associated with pesticide use. Requires technically and financially feasible measures to improve efficient consumption of energy, water, and raw materials, and introduces specific requirements for water efficiency where a project has high water demand.	Relevant. ESMF has covered guideline for managing the potential pollution (air, water, noise, soil, etc.) and solid and liquid waste generation from potential sources due to sub-project activities. With respect to Resource Efficiency, the site specific ESMP (C-ESMP) will identify feasible measures for efficient (a) energy use; (b) water usage and management to minimize water usage during construction/renovation, conservation. ESMF has emphasized on promoting sustainable use of resources, wherever possible, including energy, water, and raw materials (e.g., brick, sand, etc.).
ESS-4 Community-Health-and-Safety	Anticipate or avoid adverse impacts on the health and safety of project-affected communities during project life cycle from routine and non-routine circumstances. Promote quality, safety, and climate change	Relevant. It is likely for the EARN project - i) use of vibratory equipment, construction debris handling and disposal etc. during construction; ii) high likelihood of

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project activities
	<p>considerations in infrastructure design and construction, including dams. Avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. Have in place effective measures to address emergency events. Ensure that safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</p>	<p>direct exposure to increased construction related traffic and equipment especially on campus youth centers traversing settlement area with limited carriageway/roadway width, and sensitive receptors such as schools, religious place, health center/hospitals; iii) high dust levels, high noise and emission level in construction sites, especially during demolition of old buildings; iv) expansion of training services at union level and those operation may cause potential waste generation; and v) labor influx considering individual works sites is likely to be low, however gender mix in project workers and the target group beneficiaries may expose the women and girls to GBV and SEA/SH risks. Additional SEA/SH risks are anticipated during capacity and skill development activities, which serve as key components of the project. A proper Gender and SEA/SH Action Plan (GSEAP) will be drafted, and relevant actions will be included in the project operation manual (POM) to ensure that proper mitigation measures are taken and implemented.</p> <p>ESMF, LMP and SEP will guide preparation of site-specific management plans.</p>
<p>ESS-5 Land-Acquisition- Restrictions-on-Land- Use-and-Involuntary- Resettlement</p>	<p>Avoid or minimize involuntary resettlement by exploring project design alternatives. Avoid forced eviction. Mitigate unavoidable adverse impacts from land acquisition or restrictions on land use by providing compensation at replacement cost and assisting displaced persons in their efforts to improve, or at least restore, livelihoods and living standards to pre-displacement levels or to levels prevailing prior</p>	<p>Project will not involve in any kind of land acquisition/requisition. <b>So, no separate RAP/RPF is required for EARN Project.</b></p>

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project activities
	to the beginning of project implementation, whichever is higher. 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. Conceive and execute resettlement activities as sustainable development programs.	
ESS-6 Biodiversity- Conservation	Protect and conserve biodiversity and habitats. Apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources.	<b>Not relevant</b> since the sub-projects' activities will be executed within the existing premises of the DYD, so the project will have no such impact on biodiversity or habitat or PA, except some homestead tree cutting at the old YTC campuses. However, project will conduct E&S screening in each of the relevant activities/sites to determine presence of biodiversity impact, if any. If such threats on biodiversity identified in any sites/activities, ESS-6 will be triggered, and a detail biodiversity assessment will be required.
ESS-7 Indigenous-Peoples	Ensure that the development process fosters full respect for affected parties' human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods. Promote sustainable development benefits and opportunities in a manner that is accessible, culturally appropriate and inclusive. Improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with affected parties. Obtain the Free, Prior, and Informed Consent (FPIC) of affected parties in three circumstances. Recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.	Relevant. EARN project will cover ethnic minority populations in the plain and hill tract areas, some of whom maybe characterized as indigenous peoples or found originated from indigenous communities as per this standard. None of these peoples will be adversely affected rather benefitted from the project interventions. ESMF will provide guidance for meaningful consultation with these communities and preparation of a social inclusion and management framework (SIMF) addressing the varied needs and capacity of the disadvantaged and vulnerable individuals and groups including tribal peoples with indigenous status to address ESS7

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project activities
		requirements during project implementation. The ESMF will ensure the inclusion and proper management of the process during implementation of the project.
ESS-8 Cultural-Heritage	Protect cultural heritage from the adverse impacts of project activities and support its preservation. Address cultural heritage as an integral aspect of sustainable development. Promote meaningful consultation with stakeholders regarding cultural heritage. Promote the equitable sharing of benefits from the use of cultural heritage.	<b>Not Relevant.</b> The project will avoid activities and locations near culturally sensitive areas. So, it is unlikely to adversely affect any cultural heritage. However, the ESMF includes a Chance Finds Procedures to illustrate the course of action to be taken in case any culturally significant objects/practices are discovered.
ESS-9 Financial-Intermediaries	Sets out how Financial Intermediaries (FI) will assess and manage environmental and social risks and impacts associated with the subprojects it finances. Promote good environmental and social management practices in the subprojects the FI finance. Promote good environmental and sound human resources management within the FI.	<b>Not relevant</b> as there is no financial intermediary involved.
ESS-10 Stakeholder-Engagement-and-Information-Disclosure	Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them. Assess stakeholder interest and support for the project and enable stakeholders' views to be taken into account in project design. Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle. Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.	Consultations and disclosure of information with stakeholders will be at the core for planning and implementation of the project. The project preparation process will be all-inclusive engaging with communities and stakeholders of all groups and vulnerabilities including experts and advocacy organizations. DYD/MoYS will identify specific and relevant stakeholders and include strategies for meaningful consultation with disadvantaged and vulnerable individuals, groups and communities included in the Stakeholder Engagement Plan (SEP).
Environmental and Social Directive for	This Directive applies to the Bank and sets out the mandatory requirements for the implementation of the Environmental and	Applies to Bank in addressing E&S aspects of this project

World Bank ESS Policy, Standards, Directive	Objectives	Relevance & Extent of Relevance to the sub-project activities
Investment Project Financing	Social Policy for Investment Project Financing (IPF).	
Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups	This Directive establishes directions for Bank staff regarding due diligence obligations relating to the identification of, and mitigation of risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable	Applies to Bank in addressing E&S risks and impacts on disadvantaged and vulnerable persons or groups that are identified in this project area.
World Bank's Guidance note on managing the risks of adverse impacts on communities from temporary project induced labor influx, 2016 and the recently launched Good Practice Note for SEA/SH in education projects.	The document provides guidelines to address issues and risks arising from influx of migrant labor leading to gender-based violence, forced labor etc. especially focusing on Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) in civil works sites and in venues for second change education, skills training and job fairs and in management offices of the service providers and implementation partners. .	Applicable to all activities of project, as civil works are envisaged in the sub-project activities, and implementation partners and service providers will be dealing with young women and girls for second change education, skill training and employers at job fairs.
ESF/Safeguards Interim Note: Covid-19 considerations in construction/civil works projects	This note was issued on April 7, 2020 and includes links to the latest guidance as of this date (e.g., from WHO). Given the COVID-19 situation is rapidly evolving, when using this note it is important to check whether any updates to these external resources have been issued. This interim note is intended to provide guidance to teams on how to support Borrowers in addressing key issues associated with COVID-19 and consolidates the advice that has already been provided over the past month. As such, it should be used in place of other guidance that has been provided to date.	Applicable to all activities of project during COVID-19 pandemic.
General EHS Guidelines, April 2007, IFC	The General EHS Guidelines contain information on cross-cutting environmental, health, and safety issues potentially applicable to all industry sectors	Yes
EHS Guidelines for Construction Materials Extraction, April 2007, IFC	The EHS Guidelines contain the performance levels and measures that are considered to construction materials extraction activities such as aggregates, limestone, slates, sand, gravel, clay, gypsum, feldspar, silica sands, and quartzite	Yes

## 2.5 Gap Analysis of World Bank Requirements and National Laws

A gap analysis between WB's ESSs and GoB Regulations was conducted as part of the E&S capacity assessment of the DYD/MoYS. The results of the gap analysis indicated that the E&S risk assessment and management system for development projects in Bangladesh is open-ended but just like other country's EIA systems, does not cover all the World Bank ESF's E&S Standards. The ECA/ECR does not even define the scope of the EIA study (or the IEE), leaving it to the EIA to determine the scope through initial assessment/screening. The coverage of the EIA study therefore would depend on the expertise of the EIA team or the DoE reviewers. There is no assurance that each E&S Standard are considered in the EIA study and the formulation of the ESMP. Although the DoE's EIA requirement is heavy towards the environmental aspects, more and more social issues need to incorporate in the ESA under ESSs. Moreover, the practice under normal circumstances does not include labor management issues. Another critical gap pertains to lack of provisions for requiring the preparation of project-specific E&S management plans. The eminent domain land acquisition system for example does not require the preparation of RAP. The projects are also not required to formulate their own Labor Management Procedures/Plans. DoE's EIA doesn't have strong requirement to assess the risk on social inclusion, gender, GBV and SEA/SH. Given the gaps, this ESMF will follow the most stringent standards and requirement. Table 2.2 below has given an overview of the gaps between GoB laws and WB's ESSs and steps suggested to address those gaps.

**Table 2.2: Gaps between GoB laws and World Bank ESSs those applicable to the EARN Project**

WB ESF Standard	Gaps	Gap Minimization
ESS1: Assessment and Management of Environmental and Social Impacts and Risks	(i) IEE/EIA study screening and scoping do not guarantee coverage of all ESS standards in the assessment. (ii) The stakeholder engagement during the conduct of the IEE/EIA is limited and the IEE/EIA report is not disclosed. (iii) The IEE/EIA system in Bangladesh does not require analysis of alternatives. (iv) IEE/EIA requirement is heavy towards the environmental aspects.	ESMF has suggested to follow the ESS1 requirements, given in the relevant sections of Environmental Management Procedures. In case, DoE rules/regulations do not cover the ESS requirements, relevant clauses should be added in the ESCP, Financial Agreements and Project Appraisal Document to follow the more stringent E&S requirements according to WB ESF.
ESS2: Labor and Working Conditions	(i) The Labor Act does not specifically require that development be assessed and reviewed in terms of labor and working conditions including OHS requirements before approval. (ii) The Labor Act does not require development projects to prepare Labor Management Plans/Procedure or OHS Plan.	A LMP has been prepared. Guideline for developing Site Specific Labor Management plans including OHS has been included in the LMP.
ESS3: Resource Efficiency and Pollution Prevention and Management	Existing energy and water conservation policies, laws and regulations do not require development projects to assess resource efficiency issues and incorporate	Site specific ESMP to be developed for EARN Project components will address this issue and incorporate mitigation measures for efficient use of water resources.

WB ESF Standard	Gaps	Gap Minimization
	resource efficiency measures in their E&S risk management plans.	
ESS4: Community Health and Safety	Covered under IEE/EIA but the systems do not provide clear requirements for the development project and implementation.	Guideline for Community Health and Safety has been addressed in this ESMF.
ESS10: Stakeholder Engagement and Information Disclosure	The ECA/ECR does not specifically require consultation, but the IEE/EIA guidelines issued by DOE and other agencies recommends public consultations during scoping and the preparation of the IEE/EIA. There is also no provision for any stakeholder engagements during project implementation.	A SEP has been developed with this ESMF for engagement of communities, affected parties and stakeholders including information disclosure and consultation. The SEP will guide to ensure that project activities are identified, designed and implemented in a manner inclusive of all social groups and their vulnerabilities.

## Chapter 3: POTENTIAL KEY ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

### 3.1 Risk Categorization and Impact Assessment and Prediction

The main anticipated E&S risks and impacts of the EARN project, though of manageable scale given the scale of works within existing footprints, mostly related to construction/renovation related impacts such as occupational and community health and safety, noise, vibration, homestead tree cutting, dust pollution and waste generation and management, so impacts are expected to be minor, localized and reversible. Considering which, overall environmental and social risk of the proposed EARN project has been rated as **‘Moderate’**. Despite, the E&S risks of the proposed project have been rated moderate considering institutional capacity of the MoYS and other co-implementation partners, as the MoYS is new to undertake any WB’s financed project especially to the ESF requirements and processes. However, while the works packages would be ready by the appraisal but exact locations of the activities for civil works, stakeholder institutions, and beneficiaries targeted for project support will be determined during implementation. Hence, environmental and social risks and impacts of the activities to be undertaken will therefore be known at the implementation level. An overview of the preliminary risk categorization and ESS requirements associated with the EARN project components/sub-components based on their preliminary environmental and social assessment has been highlighted in Table 3.1.

**Table 3.1: Categorization of Activities based on Key Predicted Impacts**

Components	Sub-components	Activities	Potential Impacts	Risk Category	ESSs Requirement
<b>Component 1: Enhance access to alternate education and relevant skills development opportunities</b>	Sub-component 1.1: Promote access to skills development on market relevant skills including SEB and EDT	This sub-component will support: (i) beneficiary selection and categorization of the beneficiaries for diverse project supports; (ii) selection of local level trades; (iii) creation of a database of the potential beneficiaries and maintaining the database; (iv) provision of access to skills development, SEB and EDT for rural NEET youth, especially women, through establishing Village Level Training Centers (VLTCs); and (v) blended (online-offline) training and offline assessment on ten (10) selected trades;	<ul style="list-style-type: none"> <li>- No such environmental impact</li> <li>- Impact on livelihoods</li> <li>- Impact on community health and safety (including fire hazard)</li> <li>- Impact on students, indigenous, women and disadvantaged groups</li> <li>- Impacts on women mobility</li> <li>- Risk of on and off campus GBV</li> </ul>	Environmental – Low. Social – Moderate.	ESMF; ESMP, SEP, GSEAP, CHSP, SIMP, COVID-19 SOP.
	Sub-component 1.2: Assist the secondary dropped-out NEET youth to	The sub-component will support (i) beneficiary selection for promoting access to accelerated education programs required to reach at the skills ladder ;	<ul style="list-style-type: none"> <li>- No such environmental impact</li> <li>- Impact on livelihoods</li> <li>- Impact on community health and safety (including fire hazard)</li> </ul>	Environmental – Low. Social – Moderate.	

Components	Sub-components	Activities	Potential Impacts	Risk Category	ESSs Requirement
	reach the skills ladder	(ii) creating a data base of the potential beneficiaries and maintaining the database; (iii) developing accelerated curriculum and relevant teaching-learning materials (TLMs), production and procurement of TLMs, teacher training, center management etc.; (iv) the establishing and managing an EARN Cell at the Open University including consultants, supervisors, transport and communication; and (v) Providing incentives to eligible beneficiaries (stipend, examination fees, Textbooks)	<ul style="list-style-type: none"> <li>- Impact on students, indigenous, women and disadvantaged groups</li> <li>- Impacts on women mobility</li> <li>- Risk of on and off campus GBV</li> </ul>		
<b>Component 2: – Promote support for wage and self-employment</b>	Sub-component 2.1: Connect the beneficiaries with employers	This sub-component will support connecting eligible youths labor intermediation services to help them pursue wage employment. Key activities will include: (a) periodic job fairs and meet the employer events; (b) enterprise visits by the trainees; (c) a job portal for the EARN beneficiaries and eligible industries; (iv) internship/apprenticeship support for the eligible beneficiaries in eligible industries/firms.	<ul style="list-style-type: none"> <li>- No such environmental impact</li> <li>- Impact on livelihoods</li> <li>- Impact on indigenous, women and disadvantaged groups</li> <li>- Risk of on and off campus GBV</li> <li>- Risk of accidental fire events</li> <li>- Workplace environmental hazards and generation of solid and liquid waste</li> <li>- Impact on community and occupational health and safety</li> </ul>	Environmental – Low. Social – <u>Moderate.</u>	ESMF, SEP, GSEAP_SIMP, COVID-19 SOP.
	Sub-component 2.2: Post-training wage employment and entrepreneurship support	The sub-component will support eligible beneficiaries with seed financing in selected sectors.	<ul style="list-style-type: none"> <li>- Workplace environmental hazards and generation of solid and liquid waste.</li> <li>- Impact on livelihoods</li> <li>- Impact on indigenous, women and disadvantaged groups</li> <li>- Impact on community and occupational health and safety</li> </ul>	Environmental – Moderate. Social – Moderate.	ESMF, E&S screening/ ESMP, SEP, CHSP, OHSP, GSEAP_SIMP, COVID-19 SOP.

Components	Sub-components	Activities	Potential Impacts	Risk Category	ESSs Requirement
			- Risk of accidental fire events		
<b>Component 3: Promote Enabling Environment for NEET Youth</b>	Sub-component 3.1: Community Strengthening, Engagement and Ownership	This sub-component will support the formation of Community Groups to focus on NEET youth activities, their orientation and training, and ownership building, their continued engagement in youth activities (like, mobilization and awareness activities. trade and beneficiaries' selection procedure, manage VLTCs oversee monitoring and evaluation of EARN activities, and also preventing SEA/SH in training centers etc.)	- Impact on indigenous, women and disadvantaged groups - Impacts on women mobility - Risk of on and off campus GBV	Environmental – Low. Social – Moderate;	ESMF, SEP <sub>2</sub> , GSEAP_SIMP, COVID-19 SOP.
	Sub-component 3.2: Awareness raising and community engagement to promote positive social norms	This sub-component will support (i) awareness raising programs with different levels of orientation, and intensity, through print, electronic and social media to encourage especially females to participate in skills development opportunities; (ii) engagement men and boys for promoting women participation, and (iii) preparation of materials for promoting the opportunities provided by EARN.	- No such negative environmental and social impacts assessed.	Environmental – Low. Social – Low;	ESMF, SEP
	Sub-component 3.3: Career counseling support, leadership development and positive youth engagement activities	This sub-component will support: (i) psychosocial and career counseling support for NEET youth at Union, Upazila and District youth centers; (ii) psychosocial support through promoting youth participation in sports and cultural activities, especially females; (iii) facilitating self-help groups; (iii) leadership development trainings through the registered youth clubs; (iv) community supported child-care facilities at VLTCs; (v) life skills training and interpersonal skills and	- No such environmental impact - Impact on livelihoods - Impact on indigenous, women and disadvantaged groups - Risk of on and off campus GBV - Impact on community and occupational health and safety (including fire safety) - Impacts on women mobility	Environmental – Low. Social – Moderate;	ESMF, SEP <sub>2</sub> , GSEAP_SIMP, COVID-19 SOP.

Components	Sub-components	Activities	Potential Impacts	Risk Category	ESSs Requirement
		(vi)raising awareness and putting in place preventive and mitigation measures for SEA/SH/GBV.			
<b>Component 4: Enhance institutional capacity and Project Management</b>	Sub-Component 4.1: Support institutional capacity development for NEET youth Programs	<p>This sub-component will support: (i) establishment of a portal-based management, monitoring and reporting mechanism at DYD/MoYS; (ii) renovation and refurbishment of infrastructure (iii) equipment for digital management (IT equipment etc.); (iv) digital payment and accounts management system; and (v) training for the officials on youth issues and global experience, Gender and GBV, digital management, IT and networking support, web-page management etc.</p> <p>IDGs will be provided to DYD, BKSP and SHNIYD include (i) renovation/rehabilitation and upgradation of the existing infrastructure with access and other facilities for women and PWD; (ii) lab, equipment and materials for training; (iii) hired instructors from local and national industries; and (iv) development of communication and outreach activities and materials.</p> <p>This sub-component will also support establishment of Union Youth Information Centers (UYIC).</p> <p>The sub-component will also support establishment of a research cell at DYD</p>	<ul style="list-style-type: none"> <li>- Impact on land, air, water from construction/renovation activities</li> <li>- Loss of homestead vegetation in old YTC campuses</li> <li>- Noise pollution</li> <li>- Temporary economic displacement of squatters (if any)</li> <li>- Impact on livelihoods</li> <li>- Impact on health and safety of the workers and communities</li> <li>- Impact on students, indigenous, women and disadvantaged groups</li> <li>- Impacts on women mobility</li> <li>- Risk of on and off campus GBV</li> <li>- Increase of vulnerability</li> <li>- Risk of force eviction of squatters (if any)</li> <li>- Climate risk including flooding, and drainage congestion, green house gases emission,</li> <li>- Impact on waste generation, management and disposal</li> <li>- Impact on disposing accidental chemical and hazardous material</li> <li>- Impact on lab safety and biosecurity</li> </ul>	Environmental – Moderate. Social – Moderate;	ESMF, E&S screening/ ESMP, SEP, C-ESMP, CHSP, OHSP, GSEAP, SIMP, Lab Safety Protocol (SOP), COVID-19 SOP.
	Sub-Component 4.2: Project Management, Monitoring and Evaluation	<p>This sub-component will support (i) the establishment and operation of the Project Management Unit (PMU); (ii) the development and update of a long-term Youth</p>	N/A	N/A	ESMF/E&S Staffing in the PMU/EARN Project and Creating an Environmental,

Components	Sub-components	Activities	Potential Impacts	Risk Category	ESSs Requirement
		Development Plan; (iii) preparation of Annual Sector Performance Report; and (iv) an effective monitoring and evaluation (M&E) system.			<u>Social and Gender Cell</u> (ESG Cell) with the DYD.

### 3.1.1 Projected Environmental and Social Impacts Related to Project Siting

#### *Site Specific Land Cover and Land Use Changes*

Civil works related to expansion, renovation, construction, rehabilitation and refurbishment of existing facilities will be limited within existing premises at the local level, and therefore, potential impacts on land use and land cover would be minimum and will be restricted only at construction sites.

#### *Felling of trees*

Placement of proposed infrastructures specially in the old YTC campuses where existing facilities are very old and need demolition and subsequent reconstruction of academic and residential buildings/hostels, staff quarters and demonstration firms/sheds, etc. may require felling of planted trees/vegetation.

#### *Drainage congestion and water logging*

Potential infrastructure construction/reconstruction activities can cause drainage congestion and water logging at the campus area, if not properly considered the local drainage of runoff.

#### *Impacts on Vulnerable and disadvantage groups/communities/individuals*

This project has been designed to provide a holistic support to improve skills and livelihoods of the NEET youth, which includes mostly women, small indigenous people, labors and unskilled workers, vulnerable communities, etc. It aims to increase contribution to the economy, poverty reduction, and environmental sustainability through a set of targeted capacity building activities through government and nongovernment institutions. Its activities targeting disadvantage groups, women, and youth will create employment, enhance job opportunity, and supply skilled labour and workers for various industrial sectors. However, these activities would also have risk of discrimination and SEA/SH to the disadvantaged groups due to lack of friendly on campus training environment ensuring equal representation.

### 3.1.2 Projected Environmental and Social Impacts during Project Implementation

#### *Air Pollution*

Civil works of new and existing 71 DYC facilities and potential demolition of the old buildings (e.g., 6 buildings at divisional level) may generate emissions from excavation equipment, vibrators, excavators, other machinery and construction traffic. The emissions may also include greenhouse gases (GHGs) from engine fuel combustion (exhaust emissions) and evaporation and leaks from vehicles (fugitive emissions). Dust from construction activities will deteriorate the ambient air quality and affect the public health.

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**Noise Pollution**

Noise will be produced by vehicular movement, excavation machinery, concrete mixing, and other construction activities. The schools, religious places and crowded market areas adjacent to the construction/renovation sites are particularly vulnerable to the increased noise levels.

**Water Pollution**

During the construction/renovation activities adjacent ponds/canals/water streams can potentially cause some localized increase in water turbidity due to poor waste management. However, this increase in turbidity is not likely to have any significant impact on overall water quality and the aquatic fauna primarily because of its temporary and localized nature. The construction camps and other site facilities such as offices and warehouses will also generate considerable quantities of waste effluents. Other possible causes of land or water contamination include accidental leakage or spillage of fuels, oils, and other chemicals, and waste effluents released from construction sites and WASH updates/renovations. These effluents can potentially contaminate the drinking water sources of the area and can also be harmful to the local people, natural vegetation, cultivation fields, water bodies, and aquatic flora and fauna.

**Soil Contamination**

Much like water pollution discussed above, soils in the building demolition/construction/refurbish/expansion area and nearby lands that are used for homestead/gardening/other purposes will be exposed to pollution. Fuel and chemical material storage sites and their handling are also the potential sources for soil and water pollution. Improper siting, storage and handling of fuels, lubricants, chemicals materials, and potential spills from these will severely impact the soil and water quality and cause safety and health hazards.

**Impacts on homestead vegetation**

EARN project activities under DYD/MoYS (e.g., 64 YTC, six Regional Youth Training Centers and one 10 storied office building in Dhaka HQ) are located in the existing premises. Some of those might have localized homestead vegetation/planted trees. So, project activities especially construction, renovation and setting up different facilities might require clearing of vegetation or felling of some trees. However, impact of these tree felling/vegetation clearing would be minor and mitigable with replantation at 1:5 ratio.

**Generation of Solid and Liquid Waste**

Solid waste generated during the construction phase will include excess construction materials such as sand and soil, construction debris (plasterboard, cement, dirt, wood, metals, etc.), faulty/damaged parts, metal scraps, cardboard boxes and containers, and cotton swaths, and domestic solid waste from construction offices and camps. In addition to the above, small quantities of chemical waste will also be generated mainly from the vehicle/machinery maintenance activities (liquid fuels; lubricants, hydraulic oils; chemicals, such as anti-freeze; contaminated soil; spillage control materials used to absorb oil and chemical spillages; machine/engine filter cartridges; oily rags, spent filters, contaminated soil, and others).

Besides, EARN project will provide seed funding and grants to its beneficiaries to develop/expansion of different small-scale entrepreneurs, some of which might pose lower/moderate level risk of solid

(including e-waste) and liquid wastes. However, level of risk associated with these trades will depend on their types and mode of operation.

It is imperative that such waste is responsibly disposed to avoid adverse environmental, human health and aesthetic impacts. Inappropriate disposal of these wastes can lead to soil and water contamination as well as health hazards for the local communities, livestock, and aquatic as well as terrestrial fauna.

### ***Site Clearance and Restoration***

After the completion of the construction/renovation activities, the left-over construction material, debris, spoils, scraps and other wastes from workshops, and camp sites can potentially create hindrance and encumbrance for the local communities in addition to blocking natural drainage channels.

### ***Occupational Health and Safety***

Generally, the construction/reconstruction activities may pose health hazards to the workers at site during lifting and handling of heavy equipment, operating machinery and electrical equipment, use of chemicals and fumes, working near water or at height and more. Inappropriate handling or accidental spillage/leakage of these substances can potentially lead to health hazards for the construction workers as well as the local community.

Similar to the above, various construction/renovation/expansion of facilities may cause safety issues including physical injuries, accidental fire events and accidental death. This may be increased in absence of proper training of unskilled workers to be engaged. Local community will also be vulnerable to accidental cases starting from minor injuries for careless disposal of chemical and gaseous materials to death for example movement of the heavy machineries and equipment.

Besides, EARN project will provide seed funding and grants to its beneficiaries to develop/expansion of different small-scale entrepreneurships. Some of those entrepreneurships may cause safety issues including physical injuries, accidental fire events, physical contamination and accidental death.

Similarly, Covid-19 contamination will be an important risk associated with the workers at the construction/renovation/expansion sites. Govt. imposed Covid-19 health safety protocol for workers and WHO's Covid 19 safety guidelines should be followed to avoid any risk of spreading the virus among associated families/communities.

### ***Impacts on Livelihoods and Income***

The EARN project will have positive impacts on enhancing technical skills and livelihoods of disadvantaged people, mostly young women, small indigenous people, labors and unskilled workers, vulnerable communities, etc. It will contribute to their income generation and poverty reduction. Project's activities targeting disadvantage groups, women, and youth will create employment, enhance job opportunity, and supply skilled labor and workers for targeted industrial sectors.

### ***Impact on labor, working Conditions and labor risks, including risks of child labor and forced labor***

The proposed activities will entail employment of a significant number of labors especially during construction/reconstruction/expansion of facilities in existing institutions and setting up equipment in laboratory, workshops, and training labs (chemical, biological and electronics/electrical labs). The majority of labor will be locally hired, with the exception of skilled workers who may not be found in the project

areas. Potential risks engaged both for the hired skilled and non-skilled workers especially during construction period includes health hazards, poor living condition, accidental hazards risks, etc. Similarly, hiring labor from external area may cause social risk on the local communities includes gender-based violence, price hiking of daily used products/foods, etc. However, given the scale of the project, all of the above-mentioned social risks will be in manageable scale. Risks are also associated in-terms of hiring child labors or forced labors, considerable risk is associated to the labor trafficking. However, a separate LMF has been prepared to minimize the risk associated with labor influx.

***Impact on creating social discrimination for the most disadvantaged groups, vulnerable women/disabled persons***

Project has included various activities targeted to uplift the capacity and skill of the disadvantaged groups of the society including vulnerable women, youth and disabled persons. As most of the activities will be in operation during implementation especially admission of students, offering scholarship, providing facilities, job placement and promotion of entrepreneurs might have negative impact if not designed considering socially inclusive policies and academic practices. As most of the IDPs/SDPs will be developed during project implementation period, there is likelihood of such impacts on most disadvantaged and vulnerable groups, if not actively monitored.

**3.1.3 Projected Environmental and Social Impacts during Post Project operational Period**

***Generation of Solid Waste, Chemical and Electronic Waste***

Solid waste will be generated from during regular operation and maintenance activities of the constructed/renovated infrastructures. Chemical/hazardous waste will also be generated from different activities like laboratory operation/demonstration farms, while e-waste may be generated under the digital management or from the relevant entrepreneurs/trades (e.g., repairing of refrigerator, etc.) supported by the project. Besides, solid and chemical wastes would also be generated from the established laboratories of DYC. These wastes if not appropriately disposed of has a potential to contaminate soil and water resources, thus would affect community's health. Standard lab and health safety protocol should be followed (e.g., WHO's Laboratory Safety Guideline) during operation period.

***Noise Generation***

During operation, noise levels along the Union Centers (UC), MTC (Mobile Training Center) and VLTTTC (Village Level Technical Training Center) will be increased due to the higher traffic volume and mass people gathering. Traffic noise will be a significant nuisance to the sensitive receptors such as schools and religious places located vary close to the roads and also to the children and aged persons.

***Impacts on Local Livelihoods***

While efforts will be made to provide training and livelihood improvement of the local youths of both gender in the targeted communities, few of the project activities may have impacts on their livelihoods on both ways on a temporary basis during project implementation. However, involuntary displacement of people including physical relocation and permanent loss of livelihood will be completely avoided.

**Table 3.2: Summary of Projected Environmental and Social Impacts and their Significance (ESS Risk)**

Potential Impacts	Duration of Impact	Spatial Extent	Reversible	Likelihood	Magnitude	Sensitivity	Significance Prior to Mitigation	Significance after Mitigation
<b>Impacts related to project siting</b>								
Site specific land cover and land use changes	Short term	Local	No	Certain	Low	Mild	Low negative	Low negative
Loss of homestead trees	Short term	Local	Yes	Likely	Low	Mild	Low negative	None
Drainage congestion and water logging	Short term	Local	Yes	Likely	Low	Mild	Low negative	None
Exclusion of disadvantaged and vulnerable individuals, groups and communities	One time and permanent	Local	Yes	Likely but low	Low	Mild	Low negative	None
<b>Impacts during project implementation phase</b>								
Air pollution	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Noise	Short term	Local	Yes	Likely	Moderate	Moderate	Moderate negative	None
Water pollution	Short term	Local but beyond project footprint	Yes	Certain	Moderate	Moderate	Moderate negative	None
Soil contamination	Short term	Local	Yes	Certain	Moderate	Mild	Moderate negative	None
Impacts on homestead vegetation	Short term	Local	Yes	Certain	Low	Mild	Low negative	None
Solid and liquid waste	Short term	Local	Yes	Certain	Moderate	Mild	Moderate negative	None
Site clearance and restoration	Short term	Local	Yes	Certain	Moderate	Mild	Moderate negative	None
Occupational health and safety	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Livelihoods and Income	Short term	Local but beyond project footprint	Yes	Certain	Moderate	Moderate	Moderate Positive	Substantial Positive
Labor Impacts and risks of child labor, forced labor	Short term	Local	Yes	Likely	Low	Low	Moderate negative	None
Social discrimination for women and disadvantaged and vulnerable groups and individuals	Short term	Local	Yes	Likely	Low	Low	Moderate negative	None
<b>Impacts during post project operational period</b>								
Generation of Solid Waste, Chemical and e-Waste	Short term	Local	Yes	Certain	Moderate	Moderate	Moderate negative	None
Noise generation	Short term	Local	Yes	Likely	Low	Mild	Moderate negative	None
Impacts on livelihoods of local communities	Short term	Local	Yes	Likely	Low	Moderate	Moderate positive	Substantial positive

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## Chapter 4: ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

### 4.1 General Principle

Due to the nature of the proposed activities and their potential environmental and social impacts, the EARN project activities are fallen under 'Orange A and Orange B' category according to ECR, 1997 and also the project is rated as 'Moderate' as per the World Bank E&S risk classification, which requires initial E&S screening, in some cases detail IEE, and execution of environmental and social management plans. Therefore, the ESMF is prepared based on the following principles that can lead the planning and implementation of the project activities.

- 1) The PMU/DYD/MoYS is responsible for the compliance with national policies, regulations, and applicable WB ESSs and guidelines, as mentioned in this ESMF. The ESMF will serve as the basis for ensuring E&S compliance and inclusion of all communities irrespective of their ability to access the project benefits.
- 2) PMU/EARN Project is responsible for obtaining environmental clearance from DoE, local government agencies and World Bank as required, to coordinate with the other IAs, DPs, I/NGOs, CSOs and stakeholders in the process.
- 3) E&S Screening, IEE and ESMP (where required) will be prepared for activities as determined by DoE and guided by the ESMF. In case, requirements of DoE's guideline differ from those of WB ESF, the more stringent standards and requirements will apply.
- 4) Environmentally sensitive areas, cultural heritage sites, restricted or disputed lands (if identified during project implementation) should be handled with appropriate mitigation hierarchy including judicial resolution and compensation measures during implementation following standard procedures applicable for such sites. In case of cultural heritage sites/resources identified during civil works, securing the area, informing the IA, decide on preservation method as per expert opinion and keep the find secret if it is for the interest of the find.
- 5) Participation of stakeholders (especially local communities) should be ensured by PMU/EARN Project in planning, implementation, and monitoring of sub-project activities. PMU/EARN Project will inform project stakeholders about project interventions and its potential impacts on the surrounding environmental and social elements.
- 6) PMU/EARN Project will ensure appropriate institutional set up for implementing environmental and social management plans and inter-agency coordination. PMU will also ensure that bidding documents for contractors have specific clauses to ensure implementation of ESMPs, as required.
- 7) Contractors to be engaged in construction/renovation/expansion/repair and maintenance workers under the project should be provided with First Aid kits at camp/work sites with adequate drinking water and sanitation facilities. Workers/crew's health and safety measures shall be ensured, and use of personal protective equipment (PPE) shall be required.
- 8) Subproject activities with the following environmental and social attributes will not be eligible for implementation under this project:
  - E&S impacts identified in IEE/ESIA categorize the project to substantial or high risk (according to ESF).

- Requiring land acquisition, involuntary physical displacement, or result in loss of livelihoods of peoples.
- Associate adverse impacts on the small ethnic communities with indigenous status as per the World Bank ESS7.
- Associate significant environmental impacts, including those that significantly increase greenhouse gas emissions and impact of natural habitats and biodiversity.

#### 4.2 Project Implementation Arrangement

The overall responsibility for implementation of the project lies with the MoYS supported by an inter-ministerial Project Steering Committee (PSC), and at the working level, by a Project Implementation Committee (PIC). A dedicated Project Management Unit (PMU) will be established at the Department of Youth Development (DYD) under MoYS' leadership and oversight. The PMU, headed by a Project Director (PD), will be responsible for day-to-day project implementation supported by an Additional Project Director (APD), and adequate technical staff and consultants in key areas including project management, project operation, procurement, financial management, communications, social development, policy and research, and monitoring and evaluation. Project implementation will incorporate a number of implementation partners, such as, procured Service Providers (SPs), Bangladesh Investment Development Authority (BIDA), Bangladesh Open University (BOU), Directorate of Technical Education (DTE), and Local Government Engineering Department (LGED).

Field level activities will be implemented using the services of private sector SPs: large capable non-government organizations (NGOs) and civil society organizations (CSOs). SPs will work directly under the supervision of the Project Director, PMU, and will be responsible for managing and monitoring field level activities. Operational delivery of project activities will be provided by Community Groups (CGs), SPs and Union Youth Information Centres (UYICs). Upazila Coordinators (UCs) will be responsible for supervising the field level implementation and at least 50% of them will be female. Every UYIC should have at least one female staff.

Union level CGs will help identify the beneficiaries and trades, monitor project activities and to organize employer events. Each Village Level Training Centre (VLTC) will be supported by a Center Management Committee (CMC), who will be responsible for monitoring the training activities, act as the first reporting entity for all gender related issues, fraud and corruption.

LGED will partner with the project to provide all infrastructure and MIS supports and with the Bangladesh Open University (BOU) for developing an accelerated curriculum, establish and manage the centers, monitor students' progress, reporting progress, managing the beneficiaries' database, managing teachers and classroom observations, recruiting teachers, and training them. LGED and BOU will implement relevant project activities under Memorandum of Understanding (MOU) with the PMU.

SPs and other implementation partners such as Communication Firm, IT firm, and Third-Party Evaluation Firms will be hired by the PMU. The PMU will also recruit an agency for recruiting project officials and support staff, UCs and UYIC staff.

Leveraging the unique tradition of community-led development in Bangladesh, local Community Groups (CGs) will be formed, trained and incentivized to facilitate (i) community mobilization and awareness activities; (ii) participate in beneficiary selection and trade selection procedures; (iii) motivate and assist the families of the NEET beneficiaries to plan economic engagement of the NEET youth; (iii) management of training centers; (iv) overseeing monitoring and evaluation of the skills development and other activities; and (v) establishing community protection mechanism for preventing SEA/SH in training centers.

Besides, District Youth Centers (DYC), National Sports Council (NSC), Bangladesh Krida Shikkha Protisthan (BKSP), Sheikh Hasina National Institute of Youth Development (SHNIYD) will be supported through an Implementation Development Grant (IDG) from the Project. Capable NGOs, research organizations and universities will be supported with Innovation Fund based on their innovative proposals for outreaching the most vulnerable communities in the hard-to-reach areas bringing in the NEET youth under the project coverage.

#### **4.2.1 Institutional Capacity for Environmental and Social Management**

The Ministry of Youth and Sports (MoYS) is undertaking this project likely with a finance from the World Bank's IDA through Investment Project Financing (IPF). DYD and any of the thought-out implementation partners, except LGED, has prior experience of working with IDA finance. None of these institutions including the NGOs and CSOs to be selected as SPs and consulting service organizations and firms has institutional setup and corporate policy to adequately deal with E&S risks of development projects. The World Bank ESF is also new to these organizations. LGED has however, long experience of implementing infrastructure projects in Bangladesh following the World Bank E&S safeguards operational policy and the new ESF. LGED's long experience of developing MIS system for different projects and ministries including PEDP4, ROSCII and SEQAEP projects will be benefiting to the project.

The DYD/MoYS at the central level neither screens projects for IEE or EIA as per ECR 1997 provisions nor obtain ECC from DoE. However, LGED manages systematic E&S compliance of their projects by respective project management offices with site-specific ESMP. They usually hire consultants for ESA preparation (ESMF or ESIA). Supervision of E&S assessment and management is also done with hired consultants. DYD, like any other government organizations, has its inbuilt grievance mechanism under the GoB's central GRS Guideline 2015 (revised in 2018), operated through an online portal ([www.grs.gov.bd](http://www.grs.gov.bd)). But the central GRS at DYD is primarily managed on a reactive basis, coordinated through the MoYS.

Involvement of multiple implementation partners from among the government agencies and service providers from private sector agencies, organizations and firms request a strong coordination and hierarchical arrangement between them. The capacity of these organizations is anticipated to be low and requires management support for assessment and management of E&S risks and impacts associated with the project and risks of discrimination and GBV including SEA/SH at workplaces.

#### **4.2.2 Institutional Arrangement for E&S Risks Management**

The project, in view of the multiple implementation partners of GoB and private sector service providers, will set up centralized E&S risks management arrangement under the PMU at DYD. A dedicated Environmental, Social and Gender Cell (ESG Cell) will be established under the PMU with adequate staffing of E&S experts in complex interventions, extensive capacity development for implementing partners and service providers. The ESG Cell will be headed by a deputed focal point of DPD level appointed by the PD, and he/she will be responsible for implementation of the ESMF and E&S compliance monitoring. Head of the ESG Cell will be technically supported by the full-time consultants consisting of - one Environmental Specialist, one Social Development Specialist, one Gender and SEA/SH Specialist, and one Communications and Participation Specialist. ESG Cell consultants will monitor ESMF, SEP, LMP and Gender and SEA/SH Action Plan implementation per the ESCP and ensure compliance with both World Bank and Government E&S requirements. The Service Providers, at each division will also have E&S staff dedicatedly responsible to look after the E&S compliance monitoring, implementation partners at the

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Division level will also provide support for E&S management in subproject processing. Proposed institutional structure for ESMF Implementation has been furnished in Figure 4.1.

#### **4.2.3 Environmental and Social Assessment and Management Process**

- The environmental and social experts of ESG Cell of the PMU/EARN Project through SPs at the divisions will provide technical backstopping and coordination support to perform the E&S screening and develop site specific ESMP. The relevant experts of SPs will start the task during the initial stage of project implementation.
- E&S screening is inevitable for all the relevant activities/subprojects including trades/entrepreneurship support, reconstruction/construction of buildings, innovation activities by the I/NGOs, CSOs, Industries, etc. before execution.
- ESG Cell consultants will conduct verification of some of the screening and assessment reports through field visit.
- ESMP suggested by the E&S screening should be a binding part of the bidding documents/legal agreements/contract documents of the financial assistance recipients of trades/entrepreneurships. ESG Cell through SP of each division will ensure inclusion of the E&S clauses.
- If E&S Screening would identify any activities that requires further E&S Assessment, respective partner organization will engage an independent IEE consultant to generate a detail environmental and social baseline of the project, develop ToR for IEE study and guide conducting IEE (if recommended by DoE). ESG Cell will ensure adequate budgetary provision for E&S safeguard compliance of the SPs.
- ESG Cell will be responsible to share/submit the IEE ToR and IEE report to DoE for Clearance. They will review and clear screening and environmental assessment reports made by SPs and POs before submitting for DoE clearance and provide necessary technical inputs.
- ESG Cell consultants through relevant staff of SPs and PO will ensure that environmental and social considerations are given enough attention, weight, and influence over selection of trades, construction/renovation and improvement of infrastructures all over the country.
- All the activities of EARN Project will follow existing Environmental Code of Practices (ECoPs) prepared under ESMF.
- The project will ensure that environmental and social impact assessment addresses all potential environmental and social direct and indirect impacts of the project throughout its life: pre-project, during project and operation stages; and suggest appropriate mitigation measures. If any additional impacts are identified, IEE/ESIAs and ESMP should be reviewed and updated.

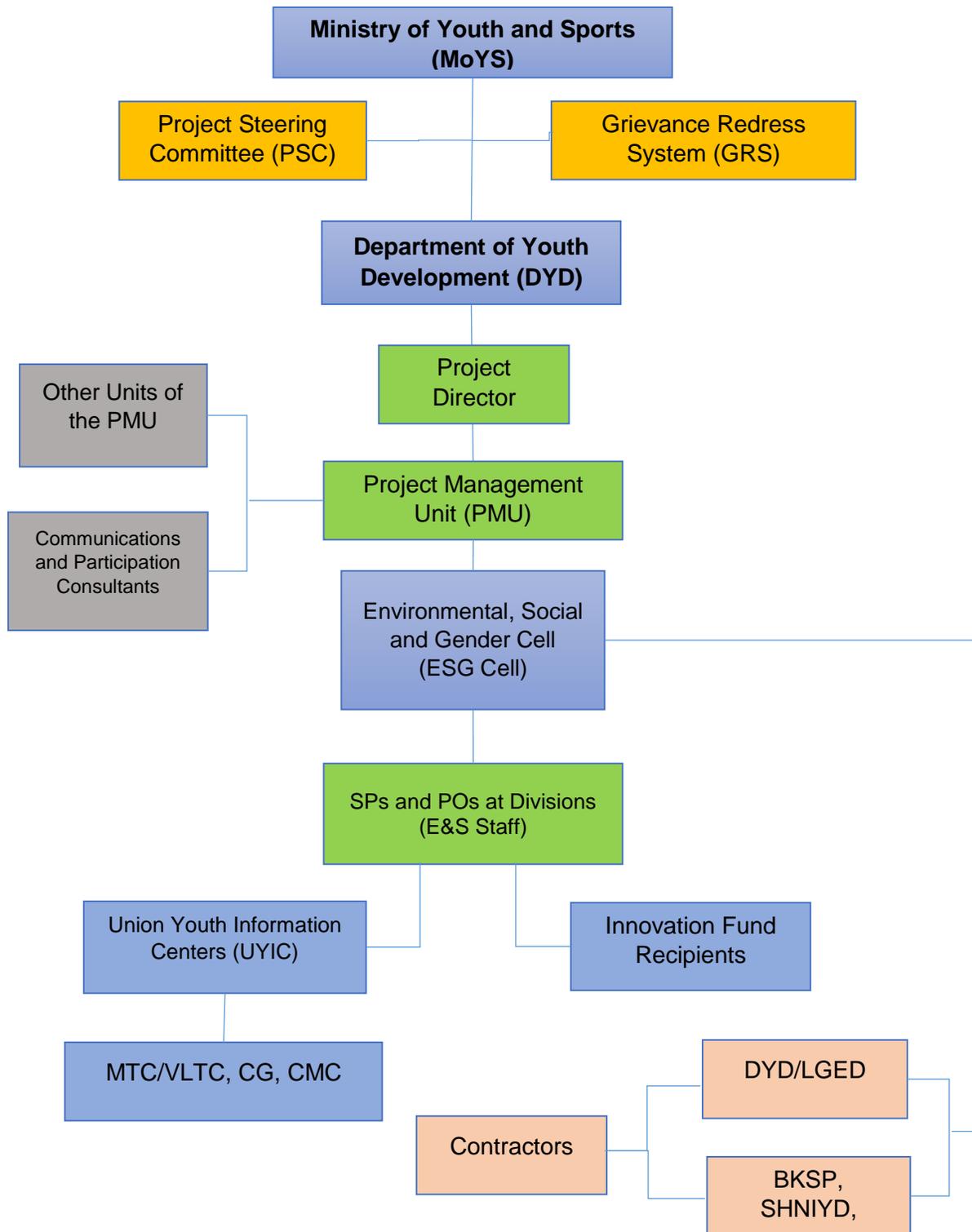


Figure 4.1: Institutional Structure for ESMF Implementation

### 4.3 Environmental and Social Screening

The screening matrix will help to decide the suitability of project activities in that particular site, suggest ESMP and the level of further Impact Assessment (EA) required. During screening, if it is found that the project may create major irreversible damage to the area or may violate an existing rules or regulations, including those generating hazardous waste or included any other environmental and social attributes in negative list of activities the sub-project will not be financed. For instance, any activities that may encroach into an ecologically critical area or a national/ global heritage site will be rejected by the ESG Cell. Moreover, alternative project activities/methods and/or operation will be considered, and the impacts will be assessed to make the project more environment friendly and socially acceptable. ESG Cell will confirm the findings of the E&S screening carried out by division level SPs and POs following the approved screening checklist. A prototype E&S screening checklist for the similar kinds of trades, entrepreneurships and construction/renovation activities is given in the Annex 05, however, this matrix is not exhausted and required technical review by the ESG Cell experts during implementation.

### 4.4 Environmental and Social Impact Assessment

#### 4.4.1 Initial Environmental Examination (IEE)

If any E&S Screening exercise of a particular project activities recommend further E&S Assessment, then the IEE study will be conducted under the supervision of ESG Cell through Partner Organization of respective division engaging independent consultant. However, according to the project planning, the activities those need IEE will be implemented at initial period and must be carried out prior to the actual interventions start. Main purpose of the IEE is to obtain Clearance from DoE and continue consultations with project stakeholders on sub-project impacts/consequences. ESG Cell will be responsible to share/submit the IEE ToR and IEE report to DoE for Clearance. They will review and clear screening and environmental assessment reports made by SPs and PO before submitting for DoE clearance and provide necessary technical inputs.

IEE should give the environment and people its due importance in the decision-making process by clearly evaluating the environmental and social consequences of the proposed study before action is taken. Early identification and characterization of critical environmental and social impacts allows the public and the DYD/MoYS to form a view about the environmental viability and social acceptability of a proposed sub-projects and what conditions should apply to mitigate or minimize those risks and impacts.

In the preparation phase, the IEE shall achieve the following objectives:

- To establish the environmental and social baseline in the study area, and to identify any significant environmental and social issues.
- To assess these impacts and provide for measures to address the adverse impacts by the provision of the requisite avoidance, mitigation and compensation measures.
- To integrate the environmental and social issues in the project planning and design.
- To develop appropriate management plans (i.e., ESMP) for implementing, monitoring and reporting of the environmental and social mitigation and enhancement measures suggested.

As described in the Chapter 2 and Chapter 3 (Table 3.1), as per ECR'97, most the components/sub-components and associated activities of the EARN Project are likely to fall ranging under the 'Orange A' category, only a few under 'Orange B' demand further EA like Initial Environmental Examination

(IEE)/ESMP and none of the activities would require Environmental and Social Assessment (ESIA). **The subproject will be ineligible for proposed investment if E&S risks and impacts are identified in screening as substantial or high risk according to the WB ESF risk category.**

#### 4.4.2 Specific Activities and Responsibilities in the Environmental and Social Assessment process

In Bangladesh, the environmental assessment procedure will pass through three major tiers in order to optimize the resources required for conduction of environmental assessment studies, these three tiers are: A) Screening, B) Scoping, and C) Initial Environmental Examination (IEE)/Detailed Environmental and Social Impact Assessment (ESIA). Screening decides whether the IEE/ESIA process should be applied to a development project and if it is required, its type, that is, IEE or ESIA. The major activities and the relevant responsibilities for each activity are shown in Table 4.1:

**Table 4.1: Major activities and responsibilities during different project stages for conducting environmental and social assessment studies in Bangladesh**

Project Stage	Steps/ Activities	Description	Responsibility
<b>Step-1: Screening</b>			
Planning and Pre-feasibility	Undertake Screening	Prepare a document containing key environmental and social (E&S) information covering potential E&S risks, mitigation measures <sup>1</sup> , evidence of public consultation and feedback, etc. Prepare generic E&S management plans for activities, which do not require further E&S assessment.	PMU/EARN as proponent or Partner NGOs at divisions/Consultants
<b>Step-2: Scoping to identify types of environmental and social assessment study</b>			
Pre-feasibility/ planning	Scoping Exercise	Identify, by using checklists and based on preliminary field examination the necessity to conduct an IEE or an ESIA, as per ECR, 1997. Produce environment and social related document to competent authority for approval.	PMU/EARN as proponent or Partner NGOs at divisions assisted by qualified professionals/Consultants
<b>Step-3: Terms of Reference (ToR) for environmental and social assessment study</b>			
Pre-feasibility/ planning	Preparation of ToR	Define the main environmental and social concerns and issues related to any infrastructure/trade activities, which must be addressed by E&S assessment.	PMU/EARN and partner NGOs assisted by professional environmental and social assessment team/consultant
	Approval of ToR	Review, comment and approve ToR	DoE, Bangladesh
<b>Step-4: Preparatory work for environmental and social assessment study</b>			
Pre-feasibility and planning	Assigning the work	Determine whether to conduct environment and social assessment using in-house staff or whether to outsource it.	PMU/EARN and Partner NGOs assisted by professional environmental and social assessment team/consultant
	Environmental and Social	Form team as per approved ToR.	

<sup>1</sup> Measures to avoid, minimize, mitigate, offset or compensate E&S impacts of project footing and implementation approach and methods.

Project Stage	Steps/ Activities	Description	Responsibility
	Assessment team formation		Environmental and Social Assessment Team
	Prepare Work Plan	Establish a work plan that gives appropriate weight to all activities.	
<b>Step-5: Undertake environmental and social assessment study</b>			
<b>Step-5.1: Desk Studies</b>			
Planning and design	Secondary data	Collect and review relevant and appropriate published data, such as maps, reports etc.	Environmental and Social Assessment Team
	Initiation, interaction and consultation	Discuss the proposed infrastructure and its potential environmental and social impacts with knowledgeable persons and concerned stakeholders.	
	Preparation of information summary	Draft a summary of the information that is relevant to the project and its possible environmental and social effects.	
	Methods and Techniques	Determine the methods by which the field work for Environmental and Social Assessment will be conducted.	
	Work Plan	Revise the work plan on the basis of desk studies	
<b>Step-5.2: Field Work</b>			
Planning and design	Field equipment	Collect and arrange field equipment required for Environmental and Social Assessment Studies	Environmental and Social Assessment Team
	Field survey for collection of baseline information	Survey at project location, interaction with the local community and investigate the issues identified during desk study; collect baseline (physical, biological and socioeconomic aspects) information	
<b>Step-5.3: Data Analysis and Interpretation</b>			
Planning and design	Impacts Identification	Establish what environmental and social impacts will be taken place as result of interaction of environmental and social settings and infrastructure construction, rehabilitation and maintenance activities.	Environmental and Social Assessment Team
	Impact Prediction	Establish the extent of environmental and social consequences of the proposed infrastructure construction and operation.	
	Impact assessment	Judge whether the consequences are significant enough to require action to be taken.	
	Mitigation Measures	Design mitigation measures to avoid, reduce, minimize & compensate for adverse impacts & maximize beneficial impacts.	
	Environmental and Social Management Plan	Prepare ESMP covering monitoring and project management to ensure the implementation of mitigation measures.	
	Stakeholder/ Public Consultation	Carry out at various stages in the assessment process to ensure quality, comprehensiveness and effectiveness and make sure that stakeholders' views are adequately addressed.	Environmental and Social Assessment Team and PMU/EARN

Project Stage	Steps/ Activities	Description	Responsibility
Review and Approval	Review & approval of environmental and social assessment report	Check completeness, adequacy, credibility, facilitate the decision-making process; decide if project should proceed or if further alternatives must be examined.	PMU/EARN will review and forward to DoE for approval of IEE report
		Approval of environmental assessment report or rejection.	DoE, Bangladesh
Design Implementation	Implementation of ESMP, Monitoring	Determines compliance with ESMP.	PMU/EARN or appointed professionals
<b>Step-6: Undertake audit</b>			
Environmental and social audit	Auditing	Environmental audit: immediately after Construction and two years after project completion.	DYD/MoYS or appointed professionals

#### 4.5 Environment and Social Management Plan (ESMP)

This section presents the outline of the Environmental and Social Management Plan (ESMP) of the EARN Project. A more detailed version of ESMP must be included in the screening reports and if required in IEE of the respective activities.

##### 4.5.1 Scope and Objectives of ESMP

The basic objective of the ESMP is to manage risks and impacts of project interventions in a way that minimizes the possible adverse impact on the environment and people of the project influence area. The specific objectives of the ESMP are to:

- Identify the mitigation measures during; and facilitate implementation of those during implementation.
- Maximize and sustain potential benefits and control negative impacts.
- Draw responsibilities for project proponent, contractors, consultants, and other members of the project team for the environmental and social management of the EARN project.
- Define a monitoring mechanism and identify monitoring parameters in order to:
  - Ensure the complete implementation of all mitigation measures,
  - Ensure the effectiveness of the mitigation measures,
  - Maintain essential ecological process, preserving biodiversity and where possible restoring degraded natural resources and habitats; and
  - Assess environmental and social training requirements for different stakeholders at various levels.

The ESMP will be managed through a number of tasks and activities and site-specific management plans. One purpose of the ESMP is to record the procedure and methodology for management of mitigation identified for each negative impacts of the project/sub-projects. ESMP will also clearly delineate responsibility of various participants and stakeholders involved in planning, implementation and operation of the project.

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#### **4.5.2 Inclusion of Relevant Components of ESMP in Contract Documents**

ESMP of screening/IEE report of the project should include a section on special E&S clauses to be incorporated in the Tender Document/ToR of the contractors/partner NGOs under General/Particular Specification. These clauses are aimed at ensuring that the Contractor/partner NGO carries out his responsibility of implementing the E&S management plan (ESMP), monitoring plan as well as other environmental, social, health and safety measures also covering discrimination and gender-based violence including sexual exploitation and abuse (SEA) and sexual harassment (SH). Such clauses may specify, for example, penalties for non-compliance as well as incentives to promote strong compliance. Contractors/NGOs must be made accountable to implement the plans and mitigation measures which pertain to them through contract documents and/or other agreements of the obligations and importance of the environmental and social components of the project. In addition, contractors will be asked to prepare a site-specific C-ESMP (Contractor's ESMP) to encompass all of the detailed site-specific plans, measures and management systems they are required to develop and implement, to be based on the ESMF recommendation and IEE findings, their work methodology, work force involvement, equipment's standard, and work scheduling.

#### **4.5.3 Payment Milestones**

Payments to contractors for physical works (e.g., construction, reconstruction, renovation, etc.) would be linked to environmental and social performance, measured by completion of the prescribed environmental and social mitigation measures. Contractors would be required to join forces with the executing agency, project management unit, partner NGOs at divisions, supervising consultants and local population for the mitigation of adverse impacts of the project. For effective implementation of the proposed mitigation and monitoring measures they would attract trained and experienced environmental and social management staff.

#### **4.5.4 Guideline to Incorporate Environmental Management in Bid Documents and Project's Operational Manuals**

PMU/EARN and Partner NGOs at divisions will be responsible to incorporate environmental and social management requirements in the bidding documents and the different operational manuals of the project activities, with the assistance of the environmental and social consultants or inhouse responsible staff. The generic guidelines to incorporate environmental and social aspects for this purpose are listed below. These are examples only and shall be further elaborated and expanded upon based on the findings and recommendations of the specific screening/IEE.

- Prepare cost estimates, to be incorporated in Bid Documents.
- Contractor version of the Environmental and Social Management Plan along with the ECoPs to be incorporated in the bid document work requirements.
- Penalty clauses for not complying with ESMP requirements to be incorporated (as per addendum to Clause 17.2 Contractor 's Care of the Works of FIDIC).

#### **4.5.5 Environmental and Social Codes of Practice (ESCoPs)**

The Environmental and Social codes of practice (ESCoPs) are generic, non-site-specific guidelines. The ESCoPs consist of environmental and social management guidelines and practices to be followed by the contractors/ implementation organizations for sustainable management of all environmental and social

issues. The contractor will be required to follow them and also use them to prepare site-specific management plans. Details of the relevant ESCoPs listed below are in Annex 06.

- ESCoP 1: Waste Management
- ESCoP 2: Drainage Management
- ESCoP 3: Topsoil Management
- ESCoP 4: Soil Quality Management
- ESCoP 5: Topography and Landscaping
- ESCoP 6: Borrow Areas Management
- ESCoP 7: Air Quality Management
- ESCoP 8: Noise and Vibration Management
- ESCoP 9: Road Transport and Road Traffic Management
- ESCoP 10: Construction Camp Management
- ESCoP 11: Cultural and Religious Issues
- ESCoP 12: Workers Health and Safety

#### **4.6 E&S management of specific sub-projects/activities**

##### **4.6.1 E&S Management of Potential Trades/Entrepreneurships**

EARN project will provide skill development training followed by financial assistance on the different selected green trades and entrepreneurship development. As discussed above, all these trades/financial assistance to the potential entrepreneurships should have gone through the E&S screening process. Result from the initial discussion at the project preparation stage revealed that the training modules of the existing trades are not designed to cover environment and social management procedures and its requirements. However, to make the trades/entrepreneurships green, E&S management procedures should be included in the training modules covering E&S issues of the trades, potential impacts on the environment and people, legal requirements and impact management procedures. ESMP of the screening/IEE studies should be an integral part of the legal agreement of the seed finance receivers/entrepreneurships.

##### **4.6.2 E&S Management of NGOs innovation activities**

EARN project will call for proposal from the I/NGOs, organizations, academic institutions, and other CBOs on innovative ideas/proposals to engage the NEET youth of the communities that are hard to reach by the common approach e.g., tea garden workers, coastal islands, hill tracts, chars/haor dwellers, etc. None of these innovations should include any activities prohibited by the negative list of the EARN project, thus each of the selected innovation must go through the E&S screening process, and the ESMP should be an integral part of the legal agreement between. PMU/EARN through its ESG Cell will be responsible entity to ensure E&S monitoring during project implementation.

##### **4.6.3 E&S management of Laboratories/Workshops**

EARN project will construct/renovate some Laboratories/Workshops for some of the YTCs to provide specialized trainings on selected trades. Standard Lab Safety Protocol needs to be prepared and implemented by the respective YTC approved by the DYD and other respective govt. authorities following the ECoPs and WHO's guideline for standard lab safety protocol. The plan will be submitted for review

and approval before the laboratories/workshops come into operation. While Laboratory Specific Safety Rules will be provided in appropriate laboratory SOP, a standard list of basic laboratory safety rules is given in the ESCoP 1 (Annex 6) and must be followed by DYD in every laboratory that uses hazardous materials or processes. These basic rules provide behavior, hygiene, and safety information to avoid accidents in the laboratory. Laboratory specific safety rules may be required for specific processes, equipment, and materials, which should be addressed by laboratory specific SOPs to be prepared during the project implementation.

#### **4.6.4 Management of Vulnerable and Disadvantaged Peoples**

There are individuals, groups or communities, who generally confront barriers that prevent them from fully participating in political, economic, and social life. These peoples are in the risks of exclusion not only through legal systems, land, and labor markets, but also discriminatory or stigmatizing attitudes, beliefs, or perceptions. Disadvantage is often based on gender, age, location, occupation, ethnicity, disability, and gender identity, among other factors. This kind of social exclusion may influence the ability of the disadvantaged and vulnerable peoples accessing project benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. The project will design and provide skills development training and financial support to the NEET youth inclusive of such disadvantages and vulnerabilities. According to project design, 60% of the targeted NEET youth would be women. The project will establish mechanism at the YTCs and other sub-project levels to address risks of discrimination, sexual exploitation and abuse (SEA) and sexual harassment (SH). A social inclusion and management framework (SIMF) has been included in this ESMF (Chapter 6) for assessment of social exclusion risks and identification of measures for inclusive targeting of beneficiaries and management of project activities. The SIMF provides guidance in identification of disadvantaged and vulnerable NEET youth, engaging with them inclusively in development dialogue and developing measures to maximize project benefits to them. The project will identify these people with special needs for their disadvantages including any challenges in their participation in project activities including consultation, identification and design of project activities, and operation and ensure non-discrimination to access project benefits.

#### **4.6.5 Community Health and Safety Measures**

The Contractors shall follow the standards set by World Bank ESS4 in order to ensure the health and safety of the community. All schemes and sub-schemes including civil construction, renovation, repair buildings and sheds, installation of water supply & sanitation facilities, shall be inspected by partner NGOs and respective representatives of ESG Cell and to assess any risks or hazards associated. After inspection, the competent professionals from ESG Cell shall certify which shall reflect on the risk of adverse consequences posed by the nature and use of the structural elements and the natural conditions of the area. Since the locations of the project are in different zones of the country community people, beneficiaries and projected affected people are to be consulted for broader support in selection of location of the proposed schemes and sub-schemes activities.

ESG Cell shall appoint quality management systems to anticipate and minimize any risks and impacts that may have on community health and safety. Traffic and road safety should be ensured, as the materials will be carried to the project sites by truck and local transport, therefore, reckless driving of the heavy vehicles are to be controlled to avoid accidents, noise and air pollutions.

The proliferation of COVID-19 should be taken into cognizance while interacting with local community. Relations with the community should be carefully managed, with a focus on measures that are being implemented to safeguard both workers and the community. The community may be concerned about the presence of non-local workers, or the risks posed to the community by local workers presence on the project site.

#### **4.6.6 COVID-19 Health and Safety of the Workforce**

The ESG Cell shall identify measures to address the COVID-19 situation depending on possible context of the project activities: the location, existing resources, availability of supplies, capacity of local emergency/health services, the extent to which the virus already exist in the area. A systematic approach to planning, recognizing the challenges associated with rapidly changing circumstances, will help the project put in place the best measures possible to address the situation. PMU/EARN should refer to guidance issued by relevant authorities, both national and international (e.g. WHO). Addressing COVID-19 at a project site goes beyond occupational health and safety and is a broader project issue which will require the involvement of different members of a project management team. The Labor Management Procedure (LMP), separate from this ESMF, details the requirements under the COVID-19 pandemic for management of civil works. Health and safety measures for the workers have also been provided in Annex 07.

#### **Contingency Plan for COVID-19**

PMU/EARN will develop a contingency plan following the WHO guidelines and the World Bank requirements for each district to put in place procedures in the event of COVID-19 reaching the area or already there. The contingency plan will be developed in consultation with national and local healthcare facilities, to ensure that arrangements are in place for the effective containment, care and treatment of workers who have contracted COVID-19. The contingency plan will also consider the response at the events of infections among the workforce, community transmission is taking place and when it is likely that access to and from a target area will be restricted to avoid spread of COVID-19.

The contingency plan will be lucid to GBV risks screening and putting in the corresponding measures to prevent and mitigate the SEA/SH risks. The contingent incidents will be duly registered with the GRM with observations of anonymity protocol. The Emergency Action Plan (EAP) will have contingency budget for any possible referral services available in the beneficiary areas. The Contingency Plan will be developed in consideration of the potential challenges with the project staff and workers in COVID-19 situations including health and safety of the workforce as well as the beneficiary communities.

#### **4.6.7 Management of Project Workers**

The DYD under the MoYS will implement the project partnering with other government departments like LGED, BOU, BIDA and DTE. Services of large NGOs/CSOs will be used for establishment and operation of training centers. The project will support innovative program by NGOs, CSOs, universities or research organizations with innovation grants. Implementation development grant (IDG) will be used for supporting NSC, DYCs, BKSP and SHNIYD. Communities in project areas at local level will be involved through CGs and CMCs. Project workers – as such – will involve direct workers under the PMU at DYD and other implementation partners, contracted workers with DYD, implementation partners and service

providers, and community workers under CGs and CMCs taken from both genders, transgender, and tribal peoples (small tribes, ethnic sects and communities). Movement and influx of project workers across the country are anticipated to induce social risks including forced labor, child labor, discrimination in employment, wage and working hours, SEA/SH, among the project workers, target group beneficiaries and the surrounding communities. A stand-alone Labor Management Procedure (LMP) has been prepared to fulfill the requirement of national labor law and the WB ESS2 and ESS4 including guidelines on labor influx and SEA/SH risks management. Labor management plan (LMP) will be prepared as part of site-specific ESMPs and any C-ESMPs for works sites as indicated in earlier sections.

#### 4.6.8 Consultation and Citizen Engagement

**Objectives of stakeholders' engagement.** The World Bank's Environmental and Social Standard (ESS) on stakeholder engagement and information disclosure (ESS10) and the Bangladesh Right to Information Act 2009 underscore the importance of information disclosure and open and transparent engagement with project stakeholders for sustainable project outcome. Stakeholder engagement will be an inclusive process and carried out throughout the life cycle of the project to achieve the following:

- Establishment of a systematic approach to stakeholder engagement that to identify and form constructive relationships with the relevant stakeholders, including beneficiaries and affected persons.
- Understand the level of interest and support stakeholders have for the project and ensure incorporation of the views of the stakeholders into the project design.
- Encourage and facilitate methods of effective, meaningful consultation and engagement with stakeholders throughout the project cycle on issues that potentially impact them.
- Ensure dissemination of information related to E&S risks and impacts to stakeholders in a timely, understandable, accessible and appropriate manner and format.

**The stakeholder engagement process.** The stakeholder engagement process for the project started early in the preparation process and involved consultations with a broad array of stakeholders including representatives from the project proponents at local level. Several stakeholder consultations were carried out in different districts with different target groups and all of them were in person consultations while the team visited the project sites. The feedback from these consultations shaped the overall approach, method and process of engagement with the stakeholders. However, women turnover in the consultation process was very low and therefore the project targets to maximize women participation in any future consultation sessions during implementation.

During these consultation sessions, the stakeholders were informed about the project and the implementation approach including (i) background of the project; (ii) environmental and social risks and likely impacts associated with the project; (iii) the national legal framework applicable to the project; the World Bank requirements including its ESF 2016; (iv) objectives and method of stakeholder engagement; (v) project grievance mechanism; and (vi) other possible impacts of the project.

The consultations elicited stakeholders' feedback as the following: (i) views on the project especially the likely social impacts; (ii) possible measures to receive the best possible outcomes; (iii) means of better delivery and assistance; (iv) assurance from the project authority to include marginalized people; and (v) provision related to safety and security of the targeted youth and their community. A summary of the major consultation meetings is given below Table 4.2

**Table 4.2: Summary of Stakeholder Consultation Meetings**

No.	Date	Venue	Main Participant Groups	No. of Participants	
				Male	Female
01	19 September 2022	In person	Consultations with the NGOs and private sectors to debrief about the overall project	19	3
02	27 September 2022	In person; Department of Youth Development Office in Rajshahi Division	Consultations with the teachers of the Rajshahi YTC	30	3
03	27 September 2022	In person; Youth Training Center, Rajshahi	Local level consultation with the participants of district level government officials of DYD and YTC.	30	3
04	28 September 2022	In person; Youth Training Center, Chapai Nawabganj	Consultations with the teachers of the Chapai Nawabganj YTC	18	4
05	12 September 2022	In person; Chittagong Upazila Office YTC	Local level consultation with the participants of district level government officials of DYD and YTC of Chittagong	26	7
06	13 September 2022	In person; Cox's Bazaar YTC	Local level consultation with the participants of district level government officials of DYD and YTC of Cox's Bazaar	28	9

Through public participation, stakeholder's viewpoints and suggestions were captured as an input to the project preparation but a detailed consultations mechanism will be developed later on during the detailed design of the Project. A summary of the issues raised by the stakeholders in the consultation meetings is given at Table 4.3.

**Table 4.3: Summary of Stakeholder Consultation Outcomes**

Issues	Discussion and issues raised
Environmental Risks and Management	<p>Followings are some key environmental factors that were identified and asked to take into consideration during implementation of the project:</p> <ul style="list-style-type: none"> <li>Air and Noise pollution would be one of the vital issues, particularly during the period when the existing building would be demolished to build new ones. There should be a proper plan in place to minimize air and noise pollution during the implementation period.</li> <li>Waste management system during construction will be one of the major issues and a proper management system will be in place to mitigate the impacts.</li> </ul>

	<ul style="list-style-type: none"> <li>• Sound pollution management system in the new buildings given most of the YTCs are very close to the main road or highways; this needs to be taken into consideration; could be by installing soundproof windows and other ventilation systems.</li> <li>• Most of the YTCs has decent number of trees inside their compound. During the implementation of the project, the number of trees that will be cut down need to minimize.</li> <li>• Water logging during the rainy season: This temporary yet hazardous problem makes lives miserable for the people who live and work in that area. Proper drainage system needs to be in place; the final designs of the sub projects will have proper details on this issue. While designing and panning for this system, need to consider sustainability issues, like capacity and proper management in mind.</li> <li>• Green space management can be considered to increase the aesthetic aspect of the building. Also, plantation, proper sitting area for small meetings, well managed open area for different activities can be considered within the design which can potentially benefit everyone.</li> </ul>
Social Risks and Management	<ul style="list-style-type: none"> <li>• Sometimes there are accidents and even fatalities during construction. Proper measures have to be taken to avoid these kinds of incidents.</li> <li>• Temporary resettlement of the trainees living in the compound of YTCs' sites; proper management and related issues has to be considered with utmost care. There are no squatters/informal occupants at any sites.</li> <li>• Mosquitoes and pesticides control measures; mostly forgotten but one of the crucial issues since serious health issues like dengue, chikungunya, etc. are associated with this.</li> <li>• Traffic congestion: During the construction period, the amount of usable land will be reduced, hence creating traffic congestion inside the compound. An alternative plan needs to put in place to minimize the congestion.</li> <li>• Noise during demolishing the existing structure: An alternative plan needs to put in place to minimize the noise.</li> </ul>
Planning and Operational Management	<ul style="list-style-type: none"> <li>• During the project implementation, there will be temporary arrangement for many issues, like labor sheds, server reinstallation, and many more. It needs to make sure that the temporary operational issues are smooth and not interrupting the daily activities of YTCs.</li> <li>• Monitoring and Evaluation</li> </ul>

Stakeholder consultations and participation will be continued all through the project duration and their feedback will be incorporated in the project's implementation strategy. A stand-alone Stakeholder Engagement Plan (SEP) has been prepared for the project in response to the World Bank ESS10 requirements where the stakeholders, as of the project appraisal, have been identified, their interests and influence are analyzed, and their engagement methods defined with timeline and budgetary resources.

#### 4.6.9 Grievance Redress Mechanism (GRM)

The project will establish a grievance redress mechanism (GRM) for ensuring inclusive participation of stakeholders and accountability of the project proponents to the beneficiaries, affected persons and other stakeholders. The objective of the GRM is to addressing grievances and complaints from the stakeholders relevant to project design, implementation approach, and management of E&S concerns and risks of discrimination, SEA/SH and other social issues. The project will ensure that project GRM is accessible for communities and stakeholders and responsive to their expectations. The project will provide GRM for the project workers focusing on contractor's and service providers personnel. A special GRM sensitive to SEA/SH related complaints is also proposed. However, project will not restrict the aggrieved persons from approaching the courts of law for legal remedy, anytime they wish to.

Given the nature and location of activities under the project, GRM will be established and operated to respond to suggestions, complaints, and grievance from the stakeholders at the central level, while complaints from project workers and complaints relevant to SEA/SH will be separately dealt with for their sensitivity. A three-tier GRM has been proposed for the project affected people, other interested parties and vulnerable and disadvantaged peoples under this project (Project GRM) to address all grievances/claims relevant to the project activities. GRM institutions will be at community level, project level and MoYS level. Details of the GRM objectives, structures, procedures and reporting requirements have been discussed in the Stakeholders Engagement Plan (SEP).

Workers GRM has been proposed in the Labor Management Procedure (LMP) for the construction workers, which will be activated at the construction sites to address complaints/grievances of the laborers.

A GBV GRM will be established at the operations level focusing on the design and management of learning and training centres and offices of the service providers, implementation partners and organizations getting support from the project towards achieving project's development objectives. The GBV GRM will be detailed in the Gender and SEA/SH Action Plan to be prepared and adopted during the early months of project implementation.

Grievance redress system is expected to be considered integral to the development activities and citizen services under each government offices. The Cabinet Division of the Ministry of Law, Justice and Parliamentary Affairs have hosted online Grievance Redress System (GRS) platform (<https://www.grs.gov.bd/>) to receive, register and resolve complaints and suggestions from citizens and stakeholders, and report, research and communicate settlements to the aggrieved persons. The project GRM will therefore be mainstreamed with the Central GRS at DYD, MoYS and LGED through respective corporate GRSs interlinking with the Centralized GRS. LGED has already drafted their corporate GRS Guideline to be adopted soon. DYD will also develop their corporate GRS Guideline in line with the GRS Guideline 2015 issued by the Cabinet Division including and operations manual.

## **4.7 Social Inclusion and Management Framework**

### **4.7.1 Introduction**

Social inclusion is a development approach to share benefits of development projects among community groups of all status. Social exclusion occurs to disadvantaged and vulnerable communities, groups, and individuals because of their particular circumstances. Social norms underlie some of the key barriers disproportionately affecting women's access to skills and employment. Differences in perceptions about women and men's roles in the family in Bangladesh and the behaviors expected of them have concrete

implications on their ability to engage in education and employment. The norm that women's primary responsibility is to manage the household, provide childcare and elder care contributes to the steep drop in female completion rates at the secondary and tertiary levels compared to primary schooling. A survey found that almost a quarter of girls and 40% of boys believed that if a family can only afford to send one child, then the boy should be sent to school. This division of labor is enforced from an early age with the high prevalence of child marriage and early pregnancies contributing to the large stock of female NEET youth compared to male NEET youth. The prevalence of traditional social norms around women's mobility implies that needing to travel outside of the locality significantly drops willingness and support for female youth to undertake training and participate in the labor force. In Bangladesh, women constitute 87% of the unpaid rural agricultural workforce. Conversely, they make up only 14% of science, technology, engineering and mathematics students.<sup>2</sup>

In summary, the stock of NEET youth, as well as the new entrants, face multiple barriers in accessing existing skills development opportunities because: (a) most training facilities are located in urban areas or at levels inaccessible to the rural NEET youth (District and Upazila level), especially women, due to social norms as well as family restrictions that limit movement outside of the locality, safety and security concerns, and lack of accommodation and safe transport facilities; (b) many NEET youth lack pre-qualification requirements for enrolment in formal vocational training institutes due to dropping out before completing secondary education; (c) training contents are seldom directly linked to the rural livelihoods and economic opportunities that NEET youth have access to; and (d) employability of the NEET youth remains low given lack of access to SEB and Communication skills trainings.

The proposed project aims at inclusive targeting and implementation approach engaging with the wider public for sharing project benefits equitably to all the citizen groups irrespective of their state of disadvantages and vulnerabilities. The Project will provide training and skills support to the NEET youth picking from the poor and vulnerable communities and those are lagging behind socially and economically. This social inclusion and management framework (SIMF) defines approaches for managing inclusive targeting, selection and management of NEET youth in program operations. The SIMF will help DYD in minimizing exclusion, discrimination and vulnerabilities of the NEET youth to exploitation including sexual exploitation and abuse (SEA) and sexual harassment (SH).

#### **4.7.2 Objective and Scope**

The social inclusion and management framework (SIMF) provides guidelines and procedures for integration of measures for social inclusion in targeting, selecting and mobilizing the NEET youth for skills training and in mainstream education for enhancing their employability accessing employment. The objectives are to ensure that the Project:

- Identifies the deserving NEET youths from diverse communities irrespective of their vulnerability and disadvantages because of their particular circumstances and ensure their enrollment in YTCs and other programs including any grants.
- Develops necessary mechanism to adequately disclose and consult with the communities vulnerable to social exclusion and with risks of discrimination.

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<sup>2</sup> Social Norms and Female Labor Force Participation in Bangladesh: The Role of Social Expectations and Reference Networks, The World Bank, 2022.

- Values and respects background, level of ability, culture and religion of the targeted youths at classrooms and in sharing other incentives.
- Never tolerates any conscious or unconscious discrimination among the children in the school premises.

Social exclusion in education and training services is rooted on poverty, gender discrimination, caste and ethnic identities, location, and social stigma on certain communities and groups. The project will ensure that targeting and enrollment access will be open to a wider groups of NEET youths of both genders in equitable proportion as per distribution in the catchment area, covering, among others, the following excluded and vulnerable groups in the intervention upazilas:

- Day-labour and landless families.
- Traditional fisherman, blacksmith, potter and other disadvantaged families.
- Special occupational groups including sweepers and tea garden laborer, gipsy, cobbler, snake charmer, other floating communities.
- Very poor and women headed families.
- Tribal families and other small ethnic groups.
- Communities from disaster prone, remote river/island/char, haor and coastal areas.
- Children with HIV/AIDS and those affected by trafficking, SEA and SH; and
- Orphaned youths.

#### **4.7.3 Social Inclusion Strategy and Measures**

The key objective of the project is to reduce the share of NEET youth, especially for women, in selected rural areas/Upazilas through increasing access to employable skills and enhancing their employability. The project will adopt an inclusive approach for targeting and selection of NEET youth from all social, economic and spatial groups of the project area communities and about 60 percent of them will be women. With a national target of reducing the share of NEET youth population in the country, the project aims to help the GoB establishing a holistic system focus on women, and enhance NEET youth's access to skills development, education and labor market opportunities for wage and self-employment. The project will promote an enabling environment for socio-economic inclusion of the target group, especially women, by helping to ease the social barriers through greater community engagement and ownership; and enhance institutional capacity of state and non-state actors. Social inclusion and management plan (SIMP) will be prepared for upazilas addressing the varying needs and capacity of tribal peoples and communities from other vulnerability and disadvantages.

#### **4.7.4 Approach and target group communities**

The project will develop capacity of wider community including parents related directly with the YTCs and strengthen institutional capacity to manage education resources – skills training, allowances and stipends for selected youths of both gender from targeted communities inclusive of their vulnerabilities. Community ownership of the interventions will be promoted through local Community Groups (CGs) formed, trained and incentivized to facilitate (i) community mobilization and awareness activities; (ii) participate in beneficiary selection and trade selection procedures; (iii) management of training centers; (iv) overseeing monitoring and evaluation of the skills development and other activities; and (v) establishing community protection mechanism for preventing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) at works places including the training centers. The project will undertake a wide

range of communication activities to form local CGs with help of the service providers (SPs). Union Youth Information Centers (UYICs) will co-ordinate and facilitate the activities of the CGs and center management committees (CMC) constituted with members from the CGs.

#### **4.7.5 Social assessment and community participation**

The project will have a Community Engagement Unit in addition to the Environmental, Social, Communications and Gender Unit for managing social assessment and community engagement in project process. Catchment areas for project interventions in selected upazilas will be identified through social screening by the Upazila Coordinators (UCs) with the help of the SPs and under the guidance of the Social Inclusion and Gender Specialist with the support team. Concentration of excluded and vulnerable groups, number of NEET youths and remoteness in terms of access to mainstream educational and skills training institutions will be the prime criteria in selection of catchment area for an YTC. In the selected upazilas, once the catchment area is identified, a social assessment (SA) will be carried out including mapping of NEET youth and the existing formal and non-formal institutions providing training and educational services. The objective of the social assessment will be to understand the needs and to identify the excluded and vulnerable groups including tribal communities in the context of quality skills training and education.

The SA will tap information like poverty, ethnic mix, occupational minorities, excluded communities, social stigma to community and groups, social exclusion and vulnerability of catchment area population, connectivity, access to education and employment, discriminations between genders, ethnicity and other vulnerabilities, and the like to determine the candidature of the community group to participate in the project. The SA will be undertaken as a participative, consultative study in the identified catchments in a selected upazila combining quantitative data in a format compatible with available database and qualitative analysis of those quantitative data. The study process will ideally include a) desk research and secondary data collection in a desired format, and b) consultation with stakeholders and key informants including education managers, teachers of local educational/training institutions, school management committees, elected people's representatives, rural journalists, parents of NEET youth, and excluded and vulnerable groups including tribal communities. Consultation will be carried out through community meetings and focused group discussions (FGD).

A social assessment report will be prepared based on mapping exercise, community meetings and FGDs. The benchmark data, collected through SA will be uploaded in the Upazila EMIS maintained by project MIS Cell in Local Government Engineering Department (LGED). Outcomes of the social assessment will be considered for establishment of training centers, development of curriculum, identification of monitoring indicators on social inclusion, and channeling cash incentives for attending NEET youths. With the help from CGs, communities will identify and contract NGOs to help them establish the YTCs, recruit the teachers and run the center administration during the first year. A specialized educational research and training organization will be contracted by the project to provide education quality support including teacher training, classroom instruction and other necessary support throughout the project life.

Social awareness and community mobilization campaign will be conducted to make the communities aware of the processes, their roles and authorities and the support they will be provided so that they are prepared to take full leadership of the YTCs. Community participation will be ensured and strengthened through the CGs. The CGs will be constituted with 11 members with representation all beneficiary groups

including mothers of the girl students. Each CG will enter into a cooperation agreement with the PMU that will include compliance with the SIMF.

#### **4.7.6 Managing Gender Inclusion and Gender Based Violence**

Given the nature and scope of the project activities like skills training for women from hard-to-reach areas in the hill districts, Cox's Bazar, tea gardens and char island, engaging girls in potential job market, entrepreneurship in small trade and youth club, and community awareness activities engaging different stakeholders, the project foresees risks of gender-based violence (GBV) including sexual exploitation and abuse and sexual harassment (SEA/SH). As most of beneficiaries are women, there is a possibility of SEA/SH/GBV risk considering the negative social norms and attitude towards women's mobility and participation in economic activities in Bangladesh. In addition, the project will provide training through UYICs, mobile training centers and also will involve different NGOs and other stakeholders where there is possibility of male instructor and presence of other project personnel. Risks of inappropriate behavior, such as sexual harassment of female students, community women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community exist. Considering the GBV trend in Bangladesh and lack of awareness among s, it may be difficult to ensure a coordinated effort in addressing and regular monitoring of SEA/SH issues within the project span.

The project will therefore prepare Gender and SEA/SH Action Plan for measures to respond to the risks associated within the project activities, which will include both preventive interventions and mitigation measures. Prevention measures include awareness campaigns, capacity building of the stakeholders, and training for teachers and volunteers on SEA/SH/GBV. Risk mitigation measures will include ensuring of Codes of Conduct (CoC) are in place for all project actors (for teachers, volunteers, NGOs) at national, district, Upazila and community level; hiring third party; mapping of GBV service providers; setting up a separate SEA/SH sensitive GRM and, including in-depth training on SEA/SH. Moreover, procurement documents (for contractors, service providers and other organizations and entities getting support through innovation grant and IDG) will adhere to compliance to SEA/SH risk management. The project GRM will be extended to responding to and managing sensitive complaints related to SEA/SH risks and incidents.

#### **4.7.7 Tribal strategy**

The project upazilas include CHT area and almost all upazilas has small proportion of tribal inhabitants. About 58% tribal groups live outside CHT in a scattered manner. The tribal strategy proposes to improve access of tribal children in skills training and education for employability. The tribal community will be specially consulted for selection of training venue, curriculum development, and recruitment and training of teachers where the catchment area includes tribal population. The SPs at Upazila level will carry out free, prior and informed consultation leading to a broad-based community support for the project. The project Consultants will consult the tribal communities during social assessment. While the CGs and UYICs will consult them in curriculum development and selection and training of teachers. The UYICs will keep them informed and involved in the operation of the training centers and disbursement of stipends among selected students attending the training centers.

Tribal institutions such as CHT Regional Council, 3 Hill District Councils, and Tribal Welfare Societies will accordingly be involved in the Project as well. Social mobilization and inclusive CGs will be established in tribal areas for motivating parents to send children to the training centers. CG membership will include

parents of tribal children, tribal leaders, and will be trained for promoting vocational education in their areas.

Any traditional complaints management system, practiced by any particular group including the tribal peoples including those with indigenous status, will be accommodated with the project grievance redress mechanism (GRM) consistent with the requirements of the ESS7.

#### **4.7.8 Channeling grants and allowances**

Students' allowances will be provided to each enrolled student meeting certain criteria on quality education including attendance, performance and continuation. The money will go directly to his/her mother's bank account in the local branch of the project designated bank or in their cell phone-based accounts. A comprehensive database and monitoring system would be in place to track acquisition of skills and receipt of eligible funds to each student and to help take timely corrective measures as necessary.

#### **4.7.9 Inclusive operation**

Students enrolled with the project training centers will be treated as one family even though they will be from diverse community groups including the excluded and vulnerable communities. Social status and background, level of ability, culture and religion of every student will be mutually valued and respected by their peers, the teachers, CGs and UYICs. Any discrimination either conscious or unconscious will not be tolerated during class operation and receiving the children at the training centers and in channeling grants and allowances.

#### **4.7.10 Monitoring and Evaluation of Social Inclusion Measures and Outcomes**

The Project will have a monitoring and evaluation (M&E) component in place to monitor the process of targeting, selection and enrollment of students from diverse community groups, curriculum design, selection of venues, recruitment of teachers and trainers including the s, training venue management, channeling grants, stipends and allowances and innovation funds. Social inclusion outputs and the grievances procedures in training center will also be integral part of the M&E system. The system will evaluate the outcomes/results of these interventions.

The PMU will engage third party monitoring (TPM) and evaluation consultant for regular implementation monitoring of the project activities and subprojects. Monitoring of the operation of the training centers, especially student and teacher attendance, will be carried out by the CGs and UYICs and UCs who will be responsible for collecting data and information. The third-party evaluation will also be built into the program to measure its results and effectiveness and also help the country identify future directions. Stakeholder and employer consultations will be conducted throughout the project's life as part of project monitoring to enable the PMU to fine-tune operations during implementation. The number of consultations and outcomes will be tracked and reported through the project's bi-annual monitoring report. A number of surveys and assessment will also be commissioned by the PMU. These include employer and beneficiary satisfaction surveys (baseline, midterm and endline), assessment of efficiency of childcare support in selected upazilas, baseline, midterm and endline survey on reduction of NEET youth share and others. M&E unit of PMU will plan and manage all the surveys, disseminate the results and share the reports with GoB management and the World Bank.

Annual reviews will be undertaken jointly by the PMU and IDA. A mid-term review (MTR) will be carried out at the halfway of the project implementation. Two months prior to the MTR, a comprehensive report on Project progress and achievements will be prepared by the external evaluation agency, under Terms of Reference acceptable to IDA, and submitted to the PMU.

#### **4.8 Guideline for preparation of Environmental and Social Monitoring Plan**

The monitoring plan is the key element of ESMP to be prepared based on impact assessment described in earlier section. The Plan describe the potentially negative impacts of each program activity, lists mitigation and control measures to address the negative impacts, and assigns responsibilities for implementation and monitoring of these measures. E&S Monitoring Plan for all partner NGOs at different divisions and other institutions of the EARN project will be prepared and included in the ESMPs.

##### **4.8.1 Monitoring Program**

As one of the key elements of the ESMP, a two-tier monitoring program is proposed comprising compliance monitoring and effects monitoring. The main purpose of this monitoring program is to ensure that the various tasks detailed in the ESMP particularly the mitigation measures are implemented in an effective manner, and to evaluate project impacts on the key environment parameters. Various types of ESMP monitoring are discussed below:

##### ***Compliance Monitoring***

The purpose of the compliance monitoring is to ensure that the contractor implements the mitigation measures given in the ESMP are effectively and timely implemented. This monitoring will generally be carried out by the ESG Cell with the help of checklists to be prepared on the basis of the Mitigation Plan (to be prepared).

##### ***Effects Monitoring During Project Implementation***

Effects monitoring is a very important aspect of environmental and social management to safeguard the protection of both environment and people. While the ESG Cell is responsible for effect monitoring during the project implementation, each partner NGO headed by a Coordinator under the Project Director/EARN will be formed in each division consisting of other members like E&S Consultants, Stakeholders Engagement and Communication Consultant, and other nominated officials from ESG Cell to assist in effects monitoring. The monitoring will comprise surveillance to check whether the contractor is meeting the provisions of the contract during construction and operation of the program including the responsible agencies for implementation and supervision.

##### ***Performance Indicators***

For evaluating the performance of the environmental and social management and monitoring plan, performance indicators are identified to for efficient and timely implementation of measures/actions proposed in ESMP. The indicators are defined both for implementation phase and for post project period. ESG Cell will be responsible for compiling the information on these indicators and report to PD/EARN project.

Separate performance indicators for each environmental and social issue will be specified in the mitigation plans for the ESG Cell and included in the associated screening/IEE ESMP. To measure the overall environmental and social performance of the project, an additional list of performance indicators is given below.

- Number of inspections carried out by ESG Cell or POs and SPs at divisions per month.

- Number of non-compliances observed by ESG Cell or POs and SPs at divisions.
- Availability of environmental specialists in ESG Cell or POs and SPs at divisions.
- Availability of social specialists in ESG Cell or POs and SPs at divisions.
- Availability of environmental and social specialists with contractors.
- Timely reporting of documents (as defined in ESCP, ESMP and monitoring plan).
- Number of trainings imparted to stakeholders/other capacity building initiatives.
- Timely implementation of activities schedule.
- Number of grievances received.
- Number of grievances resolved.
- Number of constructions related accidents.

#### **4.9 Information Disclosure**

The ESMF and any IEE/ESA/ESMP prepared for the EARN Project will be disclosed at the local and national level through different methods as described below:

##### ***Workshops/Meetings/FGDs***

A national workshop will be held at Dhaka to present the detailed project information including E&S aspects of the EARN project to the key stakeholders at preparation stage. In addition, some stakeholders' meetings will also be held at selected YTCs to disclose ESMF findings, following COVID-19 protocols mentioned earlier. Besides, FGDs and personal interviews will be carried out at all selected sites of the EARN project area to generate communities' views and concerns. Similar workshops/FGDs/Interviews will also be carried out at different stages of the IEE preparation during project implementation.

##### ***Availability of the Documents***

Summary of the ESMF, SEP, LMP and IEE reports along with ESMPs will be translated into Bengali language and disseminated locally. The full report (in English) and the summary (in Bengali) will be disclosed via DYD/MoYS and World Bank websites. Hard copy of the IEE, ESMF, SEP and LMP will also be available at DYD district offices.

#### **4.10 Capacity Building Plan**

Capacity building for effective implementation of the ESSs requirements is a key element of the ESMP. Capacity building for environmental and social safeguard management will need to be carried out at all tiers of the DYD/MoYD, including all YDC, NGO partners, other institutions and contractors. At the construction site, NGO partners at divisions and ESG Cell jointly will take the lead in implementing the capacity building plan, though the contractors will also be responsible to conduct trainings for their own staff and workers. The various aspects that are covered under the capacity building will include general environmental and social awareness, key environmental and social sensitivities of the area, key environmental and social impacts of the project, ESMP requirements, OHS aspects, and waste disposal. Hence, a separate Capacity Building Plan (CBP) for the EARN project has been prepared which will be the main guiding document to build capacity of DYD and its partners for implementing this ESMF. Following paragraphs provides summary of the capacity building requirements as assessed in this report.

#### 4.10.1 Training on E&S Management

Advanced training on environmental and social management and monitoring will be useful for the officials of the DYD and its partners in successfully implementing environmental and social management plan. It is also necessary to provide basic training for key personnel on regulatory requirements, environmental impacts, and environmental assessment and management according to the WB ESF and ECR'97. They can participate in field-based training including the environmental and social impact assessment, screening, scoping, mitigation and monitoring of existing construction, rehabilitation and maintenance projects under the DYD.

The training program for the DYD/MoYS and partner staff shall be based on their expanded functions and new and additional safeguards areas covered by the World Bank's ESF. Hence, a general introduction to the new World Bank's ESF should be priority, followed Labor and Working Conditions, Community Health and Safety and Stakeholder Engagement. In regard to IEE/ESIA, a training should also be schedule later in Year 1 of the project. The other areas which the units should immediately be trained on are field compliance monitoring and audits, particularly on C-ESMP Compliance and occupational and community health and safety audit, and applying chance find procedure (CFP) in case cultural heritage found and its assessment and impacts management for construction/renovation/expansion projects (Table 4.4). Finally, since in the long run it will be efficient for the staff of E&S units (central, regional and local levels) to contract out works to consultants, not only for preparation of E&S Screening/IEE/ESIA, but also field monitoring and evaluation, it is imperative that the ESG Cell, SP staff and other institutions shall be skilled in consulting contract management. Hence a training module on such topic is also proposed.

**Table 4.4: Training Plan and Budget for EARN Project**

Training Module	Prospective Attendees	Time Frame	Duration (Days)	Trainin g no.	No. of Participants	Responsibility	Indicative Cost in million BDT
Introduction to World Bank ESF	DYD, PMU and partner NGO staff	Year 1, Year 3	3	12	250	PMU Environmental and Social Consultants	1.20
Labor and working conditions	DYD, PMU, partner NGO staff and contractors	Year 1, Year 2	3	3	100	PMU Environmental and Social Consultants	0.30
Community health and safety	DYD, PMU, partner NGO staff and contractors	Year 2	3	3	100	PMU Environmental and Social Consultants	0.30
Stakeholder Engagement	PMU and partner NGO staff	Year 1	3	12	250	PMU Environmental and Social Consultants	1.20
Preparation of E&S screening/ IEE/ESIA under ESF	DYD, PMU, partner NGO staff	Year 1 and Year 2	3	12	250	PMU Environmental and Social Consultants	1.20

Training Module	Prospective Attendees	Time Frame	Duration (Days)	Training no.	No. of Participants	Responsibility	Indicative Cost in million BDT
ESMP compliance monitoring and audit	PMU, partner NGO staff and Field Engineers	Year 1, Year 2	3	12	250	PMU Environmental and Social Consultants	1.20
Gender, GBV including SEA/SH risks & incident management at workplaces	DYD, PMU, partner NGO staff	Year 3	3	12	250	PMU Environmental and Social Consultants	1.20
		<b>Total</b>					<b>6.60</b>

#### 4.10.2 Monitoring and Evaluation

To keep track of the progress and outcomes of the implementation of the Capacity Building Plan, the management of the EARN Project will periodically monitor and evaluate the sets of indicators in Table 4.5. The Capacity Building Plan Monitoring and Evaluation Reports should be provided to and discussed with the World Bank task team during each supervision mission.

**Table 4.5: Capacity Development Indicators**

Actions	Indicator	Method of Collection
<b>Inputs</b>		
Staff Recruited at PMU and partners NGOs/institutions	No. of new staff hired Number of consultants hired	Reports
Trainings Conducted	Number and types of trainings conducted	Reports
Coordination meetings conducted	Number of coordination meetings conducted; invitation letters sent.	Office Records
<b>Outputs</b>		
Expanded role of DYD, PMU and PMU staff	Memorandum Circular expanding roles and coverage	Copy of the MC
Prepare new/update protocols	Number and types of protocols developed	Copies of the Protocols
Prepare new/update guidelines	Number and types of guidelines developed	Copies of the Guidelines
<b>Outcomes</b>		
Scope of activities	Range of activities conducted	Reports and Staff Interviews
Skills of staff	New tasks undertaken by staff	Reports and Staff Interviews
Resource endowments	Annual budget, Office space, new equipment	Reports, Staff Interview
Coordination and involvement	Number of agencies involved in E&S Management of DYD and Partner Institutions	Reports and Staff Interview
<b>Results/Performance</b>		

Actions	Indicator	Method of Collection
Preparation of subprojects/IDG proposals	No. of subprojects prepared adequately responding to the requirements of the new ESF and relevant ESSs	PMU and partner NGOs/institutions' records
Review and approval of subprojects/IDG proposals	Number of site-specific E&S reports (screening, impact assessment and management plans) reviewed and approved under the new ESF compliant system	PMU and partner NGOs/institutions' records
Environmental and Social Auditing	Number of subprojects audited under new ESF compliant system	PMU and partner NGOs/institutions' records
Awareness of ESF	Percentage of DYD and partners' staff that are aware of the new ESF	Staff Interviews

#### 4.11 ESMF Implementation Cost

Estimated cost will be prepared for all the mitigation and monitoring measures to be proposed in the specific screening/IEE and compliance required for the ESMF. The cost estimates for some of the mitigation measures to be identified in the ESMP will be part of civil works contract. Some of suggestive activities from screening/IEE will be implemented by hiring experts (if required). The Development Project Proposal (DPP) of EARN Project/DYD/MoYS should reflect the ESMP activities with sufficient budget allocation for successful environmental and social management of the project. Budget should also be allocated for operation and regular E&S compliance monitoring for the E&S unit i.e., ESG Cell. Total BDT 118.6 million is estimated for implementation of ESMF which should be embedded in the proposed total project budget from IDA.

**Table 4.6: Estimated cost for ESMF implementation and E&S compliance management of EARN Project**

SN	Description	Amount in million BDT
1	Contractor's Budget for development of management plans baseline study, development of safety operation plans and monitoring during construction/renovation and operation, and monitoring of sites on COVID 19 health and occupation safety	2.00
2	Budget for ESG Cell E&S compliance monitoring (Water, soil and air quality monitoring during construction/renovation and Trades/Entrepreneurships) (quarterly for 5 years/as suggested in ESMP)	5.00
	organization for SEA/SH risks and incidents management	10.00
3	Tree plantation development and maintenance at sites for renovation/construction	5.00
6	Independent Consultants to prepare IEE and ESMP	30.00
7	PMU/EARN Environmental and Social staff	60.00
8	Capacity building, training plan implementation (sec 4.10) and institutional strengthening	6.60
	<b>TOTAL</b>	<b>118.6</b>

## Annexure

### Annex 1: List of selected Upazilas under the EARN Project

#### Basis of Upazila Selection

- 1) All sadar upazilas in consideration of construction/repair/renovation of all youth training centers
- 2) All upazilas of EPZ area due to the convenience and demand of Chukuri in EPZ area 3) All Upazila of economic area due to the convenience and demand of job service in economic area
- 3) Upazila of very high poverty area
- 4) Upazila of high poverty area (According to Poverty Map conducted by Bureau of Statistics and Dario FP published in 2020; POVERTY MAPS OF BANGLADESH 2016 Study conducted by WFP and BBS (Published in 2020))
- 5) Coastal areas
- 6) Tea garden
- 7) Haor area

#### Summary

Serial No	Selection Criteria	Number of Upazila	Selected Upazila	Comments
1	Upazila HQ (S)	61	61	
2	EPZ	8	5	
3	EZ	59	44	
4	CHT	26	12	
5	TG	22	12	
6	Char	14	10	
7	Haor	71	11	May be reduced
8	CA	155	33	Need to reduce
9	VH	115	29	
10	H	115	20	
11	SC		7	
Total			244	

<b>S= Upazila Sadar</b>	<b>SC= Special</b>	<b>CA= Coastal Area</b>	<b>CHT= Chattogram Hill Tracts</b>	<b>VH= Very High Poverty H= High Poverty</b>
<b>TG= Tea Garden</b>	<b>Char= Char</b>	<b>Haor= Haor</b>	<b>EPZ= Export Processing Zone</b>	<b>EZ= Economic Zone</b>

## Annex 2: Summary of Applicable Environmental, Social and Safeguards Regulations of GOB

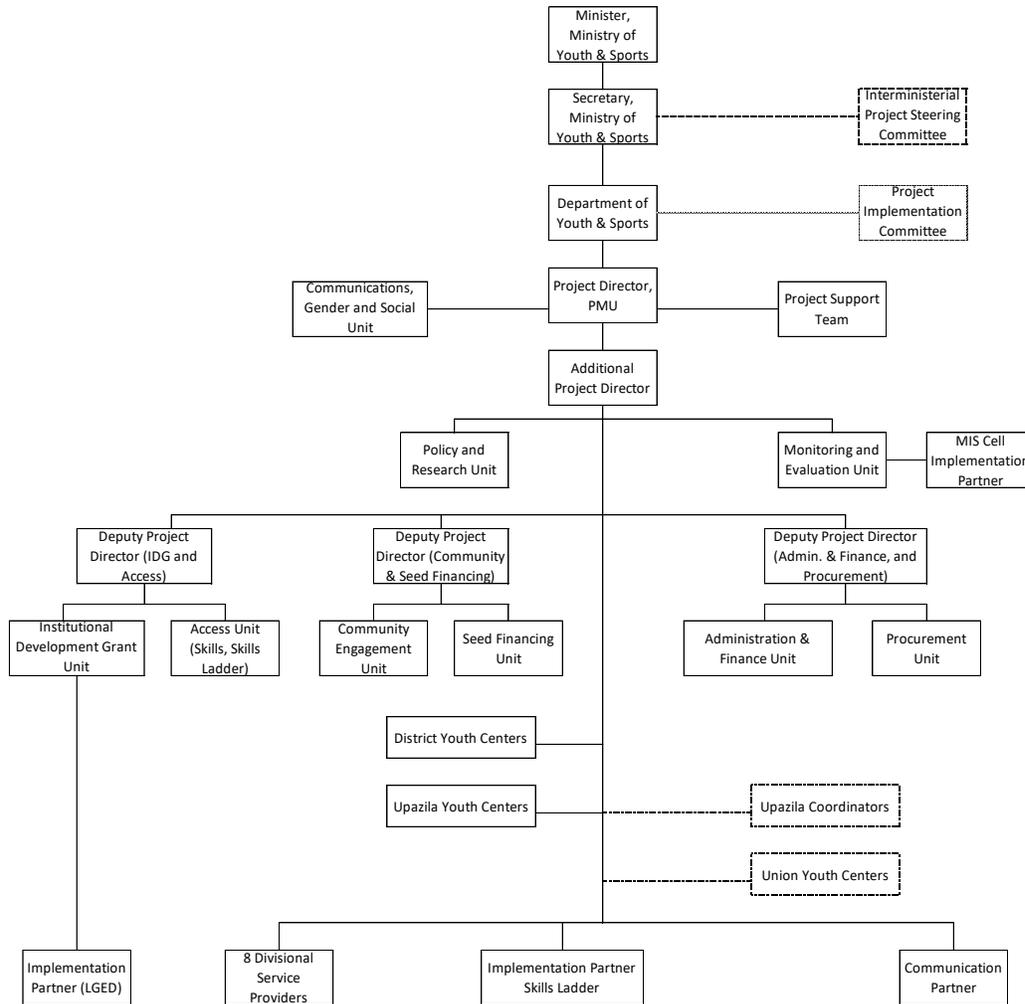
S.No.	Policies/Act/Rules	Key provisions and purpose	Applicability to LGRRP Project
1.	Bangladesh Environmental Conservation Act (ECA), 1995	This umbrella Act includes laws for conservation of the environment, improvement of environmental standards, and control and mitigation of environmental pollution. According to this act (Section 12), no industrial unit or project shall be established or undertaken without obtaining, in a manner prescribed by the accompanying Rules, an Environmental Clearance Certificate (ECC) from the Director General of DoE.	Yes, EARN project needs NOC from the local authority and ECC from the DoE.
2.	Bangladesh Environmental Conservation Rules (ECR), 1997	The Rule 7 classifies industrial units and projects into four categories depending on environmental impact and location for the purpose of issuance of ECC. These categories are: Green, Orange A, Orange B, and Red. The ECR'97 describes the procedures for obtaining Environmental Clearance Certificates (ECC) from the Department of Environment for different types of proposed units or projects.	Yes, some of the EARN interventions may be fallen under Orange B category, hence would require both IEE and ESMP approved by the DoE and have to deposit prescribe fees according to the schedule 13 to obtain ECC.
3.	Bangladesh Environment Court Act, 2010	Bangladesh Environment Court Act, 2010 has been enacted to resolve the disputes and establishing justice over environmental and social damage raised due to any development activities.	According to this act, government can take legal actions if any environmental problem occurs due to EARN project interventions.
4.	Bangladesh Labor Act, 2006, (as amended 2018); Bangladesh Labor Rules, 2015; and Bangladesh Child Labor Mitigation Policy, 2010	It 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.	Yes, EARN Project activities require labor from local and external areas.
5.	Bangladesh National Building Code, 2006	The 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 Code also clarifies the issue of safety of workmen during construction.	Yes, EARN Project will include construction or renovation or expansion of existing buildings, etc.
6.	The Noise Pollution Control Rules, 2006	The Noise Pollution Control Rules have been established in order to manage noise generating activities which have the potential to impact the health and wellbeing of workers and the surrounding communities.	Yes, many activities of the project will be performed under the densely populated areas.

S.No.	Policies/Act/Rules	Key provisions and purpose	Applicability to LGCRP Project
7.	The Water Supply and Sanitation Act (1996)	Regulates the management and control of water supply and sanitation in urban areas.	Yes, EARN project will include construction of water supply and sanitation facilities.
8.	The Ground Water Management Ordinance (1985)	Describes the management of ground water resources and licensing of tube wells	Yes, construction sites may require deep tube wells for meeting up water use.
9.	Bangladesh Biosafety Guideline 2007	Biosafety guidelines are applicable to all research and development activities of modern biotechnology conducted in laboratories of the government research institutes, state enterprises, universities, international organizations located in Bangladesh, private companies or non-governmental organizations. It applies to laboratory and field trial, trans-boundary movement, transit, handling and use of all GMOs/LMOs that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health.	Yes, project intervention of modernization and operation of lab facilities and demonstration farms those may use hazardous chemicals/medicines.

### Annex 3 List of applicable international treaties

Conventions	Years	Ratified/Accessed (AC)/Accepted (AT)/Adaptation (AD)	Relevance
Convention Concerning the Protection of the World Cultural and natural Heritage (Paris, 1972)		03.08.1983 (AT) 03.11.1983 (ratified)	Prevention of damage or destruction of culturally and/or historically significant sites, monuments, etc.
Convention on Persistent Organic Pollutants, Stockholm.	2001	In process	Restrict use of different chemicals containing POPs.
United Nations Framework Convention on Climate Change, (New York, 1992.)	1992	15.04.94	Reduction of emission of greenhouse gases.
Kyoto protocol to the United Nations Framework Convention on Climate Change		21.8.2001 (AC) 11.12.1997 (AD)	Reduction of emission of greenhouse gases.
International Convention for Protection of Birds, Paris	1950	Signed	Protection of the birds in their wild state.
Convention Concerning the Prevention and Control of Occupational Hazards caused by Carcinogenic Substances and Agents, Geneva.	1974	Signed	To protect workers against hazards arising from occupational exposure to carcinogenic substances and agents.
Convention Concerning the Protection of Workers Against Occupational Hazards in the Working Environment due to Air Pollution, Noise and Vibration, Geneva	1977	Signed	Protection of workers' health against occupational hazards in the working environment due to air pollution, noise and vibration.
Convention Concerning Occupational Safety and Health and the Working Environment, Geneva.	1981	Signed	Ensuring occupational health and safety of workers in all branches of economic activity.
Vienna Convention for the Protection of the Ozone Layer, Vienna	1985	02.08.90 (AC) 31.10.90 (entry into force)	Preventing human activities that may have adverse effects on ozone layer.
Convention Concerning Occupational Health Services, Geneva.	1985		Convention Concerning Occupational Health Services, Geneva.
Montreal Protocol on Substances that Deplete the Ozone Layer, Montreal.	1987	31.10.90 (entry into force)	Reduction of the abundance of the substances that deplete the ozone layer in the atmosphere, and thereby protect the earth's fragile ozone Layer.
Convention Concerning Safety in the Use of Chemicals at Work, Geneva.	1990	Signed	Regulating the management of chemicals in the workplaces in order to protect workers from the harmful effects of these substances.

### Annex 4: Proposed Organogram of EARN PMU



**Note:** Proposed: Upazila Coordinators and Union Youth Centers.

## Annex 5: Sample Environmental and Social Screening Checklist

### Sub-project type: Construction/Renovation Sub-projects

<b>Name of the sub-project</b>							
<b>Name of the YTC</b>							
<b>Location (Village, Ward, Union, District, Upazila)</b>							
<b>Type of sub-project</b>	New Construction	Re-Construction	Repair	Others			
<b>Size of the sub-project</b>							
<b>Number of beneficiaries</b>	Male	Female	Transgender	Ethnic	Disabled	Total	
<b>Contact person</b>							
<b>Contact information</b>							
<b>General description along with objective of the sub-project:</b>							
<b>Screening Questions</b>	YES	NO	<b>Impact Scale</b>				Remarks
			Low	Moderate	Substantial	High	
<b>A. SUB-PROJECT SITING</b>							
<b>Is the project area adjacent to or within any of the following environmentally and socially sensitive areas?</b>							
<b>Note: If yes, the subproject will be void</b>							
Cultural heritage site							
Protected Area (Forest/ Sundarbans/ National Park/ Wildlife Sanctuaries/ Fish Sanctuaries/ Ramsar Wetlands)							
Perennial Wetlands (Beel, Haor)/Fish breeding area/ Migration routes (for birds/insects/wildlife/etc.)							
Known/recorded sites for threatened animals/plants							
Over wintering habitats/ animal basking sites							
Important/traditional agrobiodiversity area							
Buffer zone of protected area							

Special area for protecting biodiversity							
Religious places (such as mosques/temples)							
Required land acquisition and involuntary displacement of people							
<b>B. ENVIRONMENTAL SCREENING CHECKLIST (Note: If yes, the subproject requires appropriate mitigation measure/s)</b>							
Do the project interventions include construction, reconstruction or demolition works?  <i>If yes, an EMP needs to be prepared</i>							
Will the activities create air pollution which would require special controls in order to ensure compliance with the Bangladesh standards?							
Traffic disturbances due to construction material transport and wastes?							
Increased noise due to transportation of equipment and construction materials?							
Disturbance or modification of existing drainage channels (streams, canals) or surface water bodies (wetlands, marshes)?							
For installation of tube wells, is there any chance to create problem to water bodies that are used for irrigation?							
For sanitary latrine construction, is there any drinking water source near 30 feet distance of the latrine?							
Possibility of stagnant water bodies in borrow pits, quarries, etc., encouraging for mosquito breeding and other disease vectors?							
Will the activities increase soil erosion and/or sedimentation?							
Is there any negative impact on soil stability and compactness?							
Will there be any interruption of the natural flow of river, canal, surface runoff or any stream?							
Is there any chance of waterlogging/insufficient drainage?							
Will the activity generate water effluents (wastewater) that may require special treatment, control or the water management permit?							

Is there any risk of groundwater pollution?							
Is there any risk of surface water pollution?							
Will the activity generate solid waste that may be considered hazardous, difficult to manage, or may be beyond the scope of regular household waste?							
Will there any destruction of trees and vegetation?							
Negative effects on locally important or valued ecosystems or vegetation?							
Negative effects on rare (vulnerable), threatened or endangered species of flora or their habitat?							
Negative effects on wildlife habitat, populations, corridors or movement?							
Is there any impact on fish migration and navigation?							
Will there any negative impact on historically or culturally important sites/structures (mosques, graveyard, monuments, etc.)?							
Are the activities likely to utilize natural resources, including water and energy in an efficient manner?							
Any other, please mention							
<b>For any negative impacts identified above, please suggest mitigation measures in the Environmental Management Plan (EMP).</b>							
<b>C. SOCIAL SCREENING CHECKLIST</b>							
Will the proposed activity require acquisition of land, e.g. <ul style="list-style-type: none"> <li>• Encroachment on private property</li> <li>• Relocation of Project affected persons</li> <li>• Loss of private lands or assets</li> <li>• Impacts on livelihood incomes</li> </ul> <i>If yes, a site-specific Resettlement/Livelihood restoration Action Plan or Abbreviated Resettlement/Livelihood restoration Action Plan shall be prepared</i>							
Are the activities likely to induce potential social conflicts?							
Is there any chance of destruction of homestead land?							

Will the project activities take place near the schools, colleges?							
Any agricultural land included within the sub-project area?							
Are the activities likely to affect working conditions, particularly in terms of employment, compliance with labor and other laws pertaining to non-discrimination, equal opportunity, child labor, and forced labor of direct, contracted and third-party workers?							
Will the activities pose occupational health and safety risks to construction workers?							
Will the project activities impact the livelihood options of the affected community?							
Is there any chance of loss of employment of the people of lower down the living standard for the implementation of the scheme?							
Will the noise levels impact particularly sensitive receptors (natural habitats, hospitals, schools, local population centers)?							
Are the activities likely to utilize natural resources, including water and energy in an efficient manner?							
Will the activities Potentially generate risks and impacts on the health and safety of the affected communities, including impacts on ecosystem services affecting the local community health and safety?							
Is there any chance of income differences between male and female workers?							
Will the proposed activity disrupt access to health services?							
Will the activities increase the risk of sexual exploitation, abuse and harassment?							
Will there be potential risks posed by the security arrangements and potential conflicts at the sub-project site between the workers and the affected community?							
Will the sub-project affect vulnerable groups by any of impacts identified above?							

Any other, please mention							
<b>Indigenous/ ethnic communities</b>							
Are there any indigenous/ ethnic communities residing within or adjacent to the sub-project site? <i>If yes, then answer the following questions.</i>							
Are the indigenous people involved in the planning and implementation of the scheme?							
Will any indigenous/ ethnic household/individual get negatively impacted by the sub-project?							
Is there any chance that the sub-project will pose cultural threat to the indigenous/ ethnic communities?							
<b>For any negative impacts identified above, please suggest mitigation measures in the Social Management Plan (SMP).</b>							

Prepared by (Name, Designation, Signature, and Date):.....

Reviewed and Approved by (Name, Designation, Signature, and Date):.....

## Annex 6: Details of the ECoPs

### ECoP : Waste Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Waste	Soil and water pollution from the improper management of wastes and excess materials from the construction sites.	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>• Develop waste management plan for various specific waste streams (e.g., E-waste, reusable waste, flammable waste, construction debris, food waste etc.) prior to commencing of construction and submit to PMU for approval.</li> <li>• Organize disposal of all wastes generated during construction in an environmentally acceptable manner. This will include consideration of the nature and location of disposal site, so as to cause less environmental impact.</li> <li>• Minimize the production of waste materials by 3R (Reduce, Recycle and Reuse) approach.</li> <li>• Segregate and reuse or recycle all the wastes, wherever practical.</li> <li>• Maintain all construction sites in a cleaner, tidy and safe condition and provide and maintain appropriate facilities as temporary storage of all wastes before transportation and final disposal.</li> </ul>
	Solid and chemical wastes generated from the established laboratories of DYC. These wastes if not appropriately disposed of has a potential to contaminate soil and water resources, thus would affect community's health.	<p>Standard lab and health safety protocol should be followed (e.g., WHO's Laboratory Safety Guideline) during operation period. A standard list of basic laboratory safety rules is given below and must be followed in every laboratory that uses hazardous materials or processes. These basic rules provide behavior, hygiene, and safety information to avoid accidents in the laboratory. Laboratory specific safety rules may be required for specific processes, equipment, and materials, which should be addressed by laboratory specific SOPs.</p> <ul style="list-style-type: none"> <li>• Know locations of laboratory safety showers, eye wash stations, and fire extinguishers. The safety equipment may be located in the hallway near the laboratory entrance.</li> <li>• Know emergency exit routes.</li> <li>• Avoid skin and eye contact with all chemicals.</li> <li>• Minimize all chemical exposures.</li> <li>• No horseplay will be tolerated.</li> <li>• Assume that all chemicals of unknown toxicity are highly toxic.</li> <li>• Post warning signs when unusual hazards, hazardous materials, hazardous equipment, or other special conditions are present.</li> <li>• Avoid distracting or startling persons working in the laboratory.</li> <li>• Use equipment only for its designated purpose.</li> <li>• Combine reagents in their appropriate order, such as adding acid to water.</li> <li>• Avoid adding solids to hot liquids.</li> <li>• All laboratory personnel should place emphasis on safety and chemical hygiene at all times.</li> <li>• Never leave containers of chemicals open.</li> <li>• All containers must have appropriate labels. Unlabeled chemicals should never be used.</li> <li>• Do not taste or intentionally sniff chemicals.</li> </ul>

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> <li>• Never consume and/or store food or beverages or apply cosmetics in areas where hazardous chemicals are used or stored.</li> <li>• Do not use mouth suction for pipetting or starting a siphon.</li> <li>• Wash exposed areas of the skin prior to leaving the laboratory.</li> <li>• Long hair and loose clothing must be pulled back and secured from entanglement or potential capture.</li> <li>• No contact lenses should be worn around hazardous chemicals – even when wearing safety glasses.</li> <li>• Laboratory safety glasses or goggles should be worn in any area where chemicals are used or stored. They should also be worn any time there is a chance of splashes or particulates to enter the eye. Closed toe shoes will be worn at all times in the laboratory. Perforated shoes or sandals are not appropriate.</li> <li>• Determine the potential hazards and appropriate safety precautions before beginning any work.</li> <li>• Procedures should be developed that minimize the formation and dispersion of aerosols.</li> <li>• If an unknown chemical is produced in the laboratory, the material should be considered hazardous.</li> <li>• Do not pour chemicals down drains. Do NOT utilize the sewer for chemical waste disposal.</li> <li>• Keep all sink traps (including cup sink traps and floor drains) filled with water by running water down the drain at least monthly.</li> <li>• Do not utilize fume hoods for evaporations and disposal of volatile solvents.</li> <li>• Perform work with hazardous chemicals in a properly working fume hood to reduce potential exposures.</li> <li>• Avoid working alone in a building. Do not work alone in a laboratory if the procedures being conducted are hazardous.</li> <li>• Laboratory employees should have access to a chemical inventory list, applicable SDSs, Department Laboratory Safety Manual, and relevant SOPs.</li> <li>• Access to laboratories and support areas such as stockrooms, specialized laboratories, etc. should be limited to approved personnel only.</li> <li>• All equipment should be regularly inspected for wear or deterioration.</li> <li>• Equipment should be maintained according to the manufacturer’s requirements and records of certification, maintenance, or repairs should be maintained for the life of the equipment.</li> <li>• Designated and well-marked waste storage locations are necessary.</li> <li>• No cell phone or earphone usage in the active portion of the laboratories, or during experimental operations.</li> <li>• Clothing made of synthetic fibers should not be worn while working with flammable liquids or when a fire hazard is present as these materials tend to melt and stick to exposed skin.</li> <li>• Laboratory coats should not be stored in offices or break rooms as these spreads contaminates to other areas.</li> </ul>

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> <li>Computers and instrumentation should be labeled to indicate whether gloves should be worn or not. Inconsistent glove use around keyboards/keypads is a source of potential contamination.</li> <li>Avoid wearing jewelry in the lab as this can pose multiple safety hazards.</li> </ul>

#### ECOP: Drainage Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Excavation and earth works, and construction yards	Lack of proper drainage for rainwater/liquid waste or wastewater owing to the construction activities harms environment in terms of water and soil contamination, and mosquito growth.	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Prepare a program for prevent/avoid standing waters, which PMU will verify in advance and confirm during implementation</li> <li>Provide alternative drainage for rainwater if the construction works/earth-fillings cut the established drainage line</li> <li>Establish local drainage line with appropriate silt collector and silt screen for rainwater or wastewater connecting to the existing established drainage lines already there</li> <li>Rehabilitate road drainage structures immediately if damaged by contractors' road transports.</li> <li>Build new drainage lines as appropriate and required for wastewater from construction yards connecting to the available nearby recipient water bodies. Ensure wastewater quality conforms to the relevant standards provided by DoE, before it being discharged into the recipient water bodies.</li> <li>Ensure the internal roads/hard surfaces in the construction yards/construction camps that generate has storm water drainage to accommodate high runoff during downpour and that there is no stagnant water in the area at the end of the downpour.</li> <li>Construct wide drains instead of deep drains to avoid sand deposition in the drains that require frequent cleaning.</li> </ul>
Ponding of water	Health hazards due to mosquito breeding	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Do not allow ponding/storage of water especially near the waste storage areas and construction camps</li> <li>Discard all the storage containers that are capable of storing of water, after use or store them in inverted position.</li> </ul>

#### ECOP: Topsoil Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Land clearing and earth works	Earthworks will impact the fertile topsoil that are enriched with nutrients required for plant growth or agricultural development	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Strip the topsoil to a depth of 15 cm and store in stockpiles of height not exceeding 2m.</li> <li>Remove unwanted materials from topsoil like grass, roots of trees and similar others.</li> <li>The stockpiles will be done in slopes of 2:1 to reduce surface runoff and enhance percolation through the mass of stored soil.</li> </ul>

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> <li>Locate topsoil stockpiles in areas outside drainage lines and protect from erosion.</li> <li>Construct diversion channels and silt fences around the topsoil stockpiles to prevent erosion and loss of topsoil.</li> <li>Spread the topsoil to maintain the physico-chemical and biological activity of the soil. The stored topsoil will be utilized for covering all disturbed area and along the proposed plantation sites</li> <li>Prior to the re-spreading of topsoil, the ground surface will be ripped to assist the bunding of the soil layers, water penetration and revegetation.</li> </ul>
Transport	Vehicular movement outside ROW or temporary access roads will affect the soil fertility of the agricultural lands	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Limit equipment and vehicular movements to within the approved construction zone</li> <li>Construct temporary access tracks to cross concentrated water flow lines at right angles</li> <li>Plan construction access to make use, if possible, of the final road alignment</li> <li>Use vehicle-cleaning devices, for example, ramps or wash down areas.</li> </ul>

#### ECOP : Topography and Landscaping

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Land clearing and earth works	Flood plains of the existing Project area will be affected by the construction of various project activities. Construction activities especially earthworks will change topography and disturb the natural rainwater/flood water drainage as well as will change the local landscape.	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Ensure the topography of the final surface of all raised lands (construction yards, approach roads, access roads, bridge end facilities, etc.) are conducive to enhance natural draining of rainwater/flood water.</li> <li>Keep the final or finished surface of all the raised lands free from any kind of depression that insists water logging.</li> <li>Undertake mitigation measures for erosion control/prevention by grass-turfing and tree plantation, where there is a possibility of rain-cut that will change the shape of topography.</li> <li>Cover immediately the uncovered open surface that has no use of construction activities with grass-cover and tree plantation to prevent soil erosion and bring improved landscaping.</li> </ul>

#### ECOP: Air Quality Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Air quality can be adversely affected by vehicle exhaust emissions and combustion of fuels.	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Fit vehicles with appropriate exhaust systems and emission control devices. Maintain these devices in good working condition.</li> <li>Operate the vehicles in a fuel-efficient manner</li> </ul>
Construction machinery	Air quality can be adversely affected by	The Contractor shall

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	emissions from machinery and combustion of fuels.	<ul style="list-style-type: none"> <li>Fit machinery with appropriate exhaust systems and emission control devices. Maintain these devices in good working condition in accordance with the specifications defined by their manufacturers to maximize combustion efficiency and minimize the contaminant emissions. Proof or maintenance register shall be required by the equipment suppliers and contractors/subcontractors</li> </ul>
Construction activities	Dust generation from construction sites, material stockpiles and access roads are a nuisance in the environment and can be a health hazard.	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Water the material stockpiles, access roads and bare soils on an as required basis to minimize the potential for environmental nuisance due to dust. Increase the watering frequency during periods of high risk (e.g., high winds). Stored materials such as gravel and sand shall be covered and confined to avoid their being wind-drifted</li> <li>Minimize the extent and period of exposure of the bare surfaces</li> <li>Reschedule earthwork activities or vegetation clearing activities, where practical, if necessary to avoid during periods of high wind and if visible dust is blowing off-site</li> <li>Restore disturbed areas as soon as practicable by vegetation/grass-turfing</li> <li>Store the cement in silos and minimize the emissions from silos by equipping them with filters.</li> <li>Establish adequate locations for storage, mixing and loading of construction materials, in a way that dust dispersion is prevented because of such operations</li> <li>Crushing of rocky and aggregate materials shall be wet-crushed or performed with particle emission control systems.</li> </ul>

ECOP: Noise and Vibration Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Noise quality will be deteriorated due to vehicular traffic	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Maintain all vehicles in order to keep it in good working order in accordance with manufactures maintenance procedures</li> <li>Make sure all drivers will comply with the traffic codes concerning maximum speed limit, driving hours, etc.</li> <li>Organize the loading and unloading of trucks, and handling operations for the purpose of minimizing construction noise on the work site</li> </ul>
Construction activities	Noise and vibration may have an impact on people, property, fauna, livestock and the natural environment.	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Notify adjacent landholders prior any typical noise events outside of daylight hours</li> <li>Educate the operators of construction equipment on potential noise problems and the techniques to minimize noise emissions</li> <li>Employ best available work practices on-site to minimize occupational noise levels</li> <li>Install temporary noise control barriers where appropriate</li> <li>Notify affected people if major noisy activities will be undertaken, e.g., pile driving</li> </ul>

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> <li>Plan activities on site and deliveries to and from site to minimize impact</li> <li>Monitor and analyze noise and vibration results and adjust construction practices as required.</li> <li>Avoid undertaking the noisiest activities, where possible, when working at night near the residential areas.</li> </ul>

#### ECOP: Road Transport and Road Traffic Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Increased traffic use of road by construction vehicles will affect the movement of normal road traffics and the safety of the road-users.	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Prepare and submit a traffic management plan to the RSC for his approval at least 30 days before commencing work on any project component involved in traffic diversion and management.</li> <li>Include in the traffic management plan to ensure uninterrupted traffic movement during construction: detailed drawings of traffic arrangements showing all detours, temporary road, temporary bridges temporary diversions, necessary barricades, warning signs / lights, and road signs.</li> <li>Provide signs at strategic locations of the roads complying with the schedules of signs contained in the Bangladesh Traffic Regulations.</li> <li>Install and maintain a display board at each important road intersection on the roads to be used during construction, which shall clearly show the following information in Bangla: <ul style="list-style-type: none"> <li>Location: Village name</li> <li>Duration of construction period</li> <li>Period of proposed detour / alternative route</li> <li>Suggested detour route map</li> <li>Name and contact address/telephone number of the concerned personnel</li> <li>Name and contact address / telephone number of the Contractor</li> <li>Inconvenience is sincerely regretted.</li> </ul> </li> </ul>
	Accidents and spillage of fuels and chemicals	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Restrict truck deliveries, where practicable, to daytime working hours.</li> <li>Restrict the transport of oversize loads.</li> <li>Operate road traffics/transport vehicles, if possible, to nonpeak periods to minimize traffic disruptions.</li> <li>Enforce on-site speed limit</li> </ul>

#### ECOP: Construction Camp Management

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Siting and Location of construction camps	Campsites for construction workers are the important locations that have significant	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Locate the construction camps at areas which are acceptable from environmental, cultural or social point of view.</li> </ul>

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	impacts such as health and safety hazards on local resources and infrastructure of nearby communities.	<ul style="list-style-type: none"> <li>• Consider the location of construction camps away from communities in order to avoid social conflict in using the natural resources such as water or to avoid the possible adverse impacts of the construction camps on the surrounding communities.</li> <li>• Submit to the RSC for approval a detailed layout plan for the development of the construction camp showing the relative locations of all temporary buildings and facilities that are to be constructed together with the location of site roads, fuel storage areas (for use in power supply generators), solid waste management and dumping locations, and drainage facilities, prior to the development of the construction camps.</li> <li>• Local authorities responsible for health, religious and security shall be duly informed on the set up of camp facilities so as to maintain effective surveillance over public health, social and security matters</li> </ul>
Construction Camp Facilities	Lack of proper infrastructure facilities, such as housing, water supply and sanitation facilities will increase pressure on the local services and generate substandard living standards and health hazards.	<p>The Contractor shall provide the following facilities in the campsites:</p> <ul style="list-style-type: none"> <li>• Adequate housing for all workers</li> <li>• Safe and reliable water supply.</li> <li>• Hygienic sanitary facilities and sewerage system. The toilets and domestic wastewater will be collected through a common sewerage. Provide separate latrines and bathing places for males and females with total isolation by wall or by location. The minimum number of toilet facilities required is one toilet for every ten persons.</li> </ul>
Disposal of waste	Management of wastes is crucial to minimize impacts on the environment	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>• Ensure proper collection and disposal of solid wastes within the construction camps</li> <li>• Insist waste separation by source; organic wastes in one pot and inorganic wastes in another pot at household level.</li> <li>• Store inorganic wastes in a safe place within the household and clear organic wastes on daily basis to waste collector. Establish waste collection, transportation and disposal systems with the manpower and equipment/vehicles needed.</li> <li>• Dispose organic wastes in a designated safe place on daily basis. At the end of the day cover the organic wastes with a thin layer of sand so that flies, mosquitoes, dogs, cats, rats, are not attracted. One may dig a large hole to put organic wastes in it; take care to protect groundwater from contamination by leachate formed due to decomposition of wastes. Cover the bed of the pit with impervious layer of materials (clayey or thin concrete) to protect groundwater from contamination.</li> <li>• Locate the garbage pit/waste disposal site min 500 m away from the residence so that peoples are not disturbed with the odor likely to be produced from anaerobic decomposition of wastes at the waste dumping places. Encompass the waste dumping place by fencing and tree plantation to prevent children to enter and play with.</li> </ul>

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> <li>Do not establish site specific landfill sites. All solid waste will be collected and removed from the work camps and disposed in approval waste disposal sites.</li> </ul>
Fuel supplies for cooking purposes	Illegal sourcing of fuel wood by construction workers will impact the natural flora and fauna	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Provide fuel to the construction camps for their domestic purpose, in order to discourage them to use fuel wood or other biomass.</li> <li>Made available alternative fuels like natural gas or kerosene on ration to the workforce to prevent them using biomass for cooking.</li> <li>Conduct awareness campaigns to educate workers on preserving the protecting the biodiversity and wildlife of the project area, and relevant government regulations and punishments on wildlife protection.</li> </ul>
Safety	In adequate safety facilities to the construction camps may create security problems and fire hazards	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Provide appropriate security personnel (police / home guard or private security guards) and enclosures to prevent unauthorized entry into the camp area.</li> <li>Maintain register to keep a track on a head count of persons present in the camp at any given time.</li> <li>Encourage use of flameproof material for the construction of labor housing / site office. Also, ensure that these houses/rooms are of sound construction and capable of withstanding windstorms/cyclones.</li> <li>Provide appropriate type of firefighting equipment suitable for the construction camps</li> <li>Display emergency contact numbers clearly and prominently at strategic places in camps.</li> <li>Communicate the roles and responsibilities of laborers in case of emergency in the monthly meetings with contractors</li> </ul>
Site Restoration	Restoration of the construction camps to original condition requires demolition of construction camps.	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Dismantle and remove from the site all facilities established within the construction camp including the perimeter fence and lockable gates at the completion of the construction work.</li> </ul>

#### ECOP: Worker Health and Safety

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Best practices	Construction works may pose health and safety risks to the construction workers and site visitors leading to severe injuries and deaths. The population in the proximity of the construction site and the construction workers will be exposed to a number	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>Implement suitable safety standards for all workers and site visitors which shall not be less than those laid down on the international standards (e.g., International Labor Office guideline on 'Safety and Health in Construction; World Bank Group's 'Environmental Health and Safety Guidelines') and contractor's own national standards or statutory regulations, in addition to complying with the national standards of the Government of Bangladesh (e.g., The Bangladesh Labor Code, 2006')</li> </ul>

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	of (i) biophysical health risk factors, (e.g., noise, dust, chemicals, construction material, solid waste, wastewater, vector transmitted diseases etc.), (ii) risk factors resulting from human behavior (e.g., STD, HIV etc.) and (iii) road accidents from construction traffic.	<ul style="list-style-type: none"> <li>• Provide the workers with a safe and healthy work environment, taking into account inherent risks in its particular construction activity and specific classes of hazards in the work areas,</li> <li>• Provide personal protection equipment (PPE) for workers, such as safety boots, helmets, masks, gloves, protective clothing, goggles, full-face eye shields, and ear protection. Maintain the PPE properly by cleaning dirty ones and replacing them with the damaged ones.</li> <li>• Safety procedures include provision of information, training and protective clothing to workers involved in hazardous operations and proper performance of their job</li> <li>• Appoint an environment, health and safety manager to look after the health and safety of the workers</li> <li>• Inform the local authorities responsible for health, religious and security duly informed before commencement of civil works and establishment of construction camps so as to maintain effective surveillance over public health, social and security matters.</li> </ul>
	Child and pregnant labor	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>• not hire children of less than 14 years of age and pregnant women or women who delivered a child within 8 preceding weeks, in accordance with the Bangladesh Labor Code, 2006</li> </ul>
Water and sanitation facilities at the construction sites	Lack of Water sanitation facilities at construction sites cause inconvenience to the construction workers and affect their personal hygiene.	<ul style="list-style-type: none"> <li>• The contractor shall provide portable toilets at the construction sites, if about 25 people are working the whole day for a month. Location of portable facilities shall be at least 6 m away from storm drain system and surface waters. These portable toilets shall be cleaned once a day and all the sewerage shall be pumped from the collection tank once a day and shall be brought to the common septic tank for further treatment.</li> <li>• Contractor shall provide bottled drinking water facilities to the construction workers at all the construction sites.</li> </ul>
Trainings	Lack of awareness and basic knowledge in health care among the construction workforce, make them susceptible to potential diseases.	<p>The Contractor shall</p> <ul style="list-style-type: none"> <li>• Train all construction workers in basic sanitation and health care issues (e.g., how to avoid malaria and transmission of sexually transmitted infections (STI) HIV/AIDS.</li> <li>• Train all construction workers in general health and safety matters, and on the specific hazards of their work Training shall consist of basic hazard awareness, site specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate.</li> <li>• Commence the malaria, HIV/AIDS and STI education campaign before the start of the construction phase and complement it with by a strong condom marketing, increased access to condoms in the area as well as to voluntary counseling and testing.</li> <li>• Implement malaria, HIV/AIDS and STI education campaign targeting all workers hired, international and national, female and male, skilled, semi- and unskilled occupations, at the time</li> </ul>

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<p>of recruitment and thereafter pursued throughout the construction phase on ongoing and regular basis. This shall be complemented by easy access to condoms at the workplace as well as to voluntary counseling and testing.</p>

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## Annex 7: Workforce Health and Safety Under COVID-19 Pandemic in Bangladesh

**(b)** The PMU/EARN should identify measures to address the COVID-19 situation. What will be possible will depend on the context of the project activities: the location, existing resources, availability of supplies, capacity of local emergency/health services, the extent to which the virus already exist in the area. A systematic approach to planning, recognizing the challenges associated with rapidly changing circumstances, will help the project put in place the best measures possible to address the situation. PMU should refer to guidance issued by relevant authorities, both national and international (e.g., WHO). Addressing COVID-19 at a project site goes beyond occupational health and safety and is a broader project issue which will require the involvement of different members of a project management team.

### **(c) Assessing Workforce Characteristics**

- Breakdown of workers temporarily hired (i.e., workers from the community), and government officials. Where possible, there should be health check before employment, as workers that may be more at risk from COVID-19, those with underlying health issues or who may be otherwise at risk.
- Consideration should be given to ways in which to minimize movement in and out of site to avoid workers returning home to affected areas.
- Consideration should be given to requiring workers lodging in the local community to move to separate lodging facility (subject to availability) where they would be subject to the same restrictions.
- Workers from local communities, who return home daily will be more difficult to manage. They should be subject to health checks regularly and at some point, circumstances may make it necessary to require them to either use accommodation on site or not to come to work.
- Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.
- Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviors required of them in enforcing such system and any COVID - 19 specific considerations.
- Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
- Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site.
- Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
- During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
- Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.

- Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.
- All rental vehicles should be parked in a secured place and no unauthorized use should be stopped until the contract is over.
- Placing posters and signs around the site, with images and text in local languages.
- Ensuring handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout site, including at entrances/exits to work areas; where there is a toilet, canteen or food distribution, or provision of drinking water; in worker accommodation; at waste stations; at stores; and in common spaces. Where handwashing facilities do not exist or are not adequate, arrangements should be made to set them up. Alcohol based sanitizer (if available, 60-95% alcohol) can also be used.
- Review worker accommodations, and assess them in light of the requirements set out in [IFC/EBRD guidance on Workers' Accommodation: processes and standards](#), which provides valuable guidance as to good practice for accommodation.
- Setting aside part of worker accommodation for precautionary self-quarantine as well as more formal isolation of staff who may be infected.

***Persons with symptoms should:***

- wear a medical mask, self-isolate, and seek medical advice as soon as they start to feel unwell. Symptoms can include fever, fatigue, cough, sore throat, and difficulty breathing. It is important to note that early symptoms for some people infected with COVID-19 may be very mild.
- follow instructions on how to put on, take off, and dispose of medical masks.
- follow all additional preventive measures, in particular, hand hygiene and maintaining physical distance from other persons.

***All persons should:***

- avoid groups of people and enclosed, crowded spaces.
- maintain physical distance of at least 1 m from other persons, in particular from those with respiratory symptoms (e.g., coughing, sneezing);
- perform hand hygiene frequently, using an alcohol-based hand rub if hands are not visibly dirty or soap and water when hands are visibly dirty.
- cover their nose and mouth with a bent elbow or paper tissue when coughing or sneezing, dispose of the tissue immediately after use, and perform hand hygiene.
- refrain from touching their mouth, nose, and eyes.

**(d) Cleaning and Waste Disposal**

Conduct regular and thorough cleaning of all site facilities, including offices, accommodation, canteens, common spaces. Review cleaning protocols for key construction equipment (particularly if it is being operated by different workers). This should include:

- Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.
- Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.
- Where it is anticipated that cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, providing them with appropriate PPE: gowns or aprons, gloves, eye protection (masks, goggles or face screens) and boots or closed work shoes. If appropriate PPE is not available, cleaners should be provided with best available alternatives.

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- Training cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).
  - Any medical waste produced during the care of ill workers should be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO). If open burning and incineration of medical wastes is necessary, this should be for as limited a duration as possible. Waste should be reduced and segregated, so that only the smallest amount of waste is incinerated (for further information [see WHO interim guidance on water, sanitation and waste management for COVID-19](#)).
  - All vehicles should be cleaned thoroughly with disinfectants after returning to the parking facilities.

#### **Disposal of Personal Protective Equipment (PPE):**

The project intends to provide reusable (Cloth) masks since it can be washed and reused and waste at downstream will be less. The masks are washed daily if used for a significant period during the day. Washing can be by hand or machine wash (use warm or hot water) using normal household laundry detergent and/or color safe bleach. If PPE is exposed to infectious materials during use (e.g., body fluids from an infected person) the PPE is considered contaminated and the wearer should remove it promptly, using proper removal procedures. It is essential that used PPE is stored securely within disposable rubbish bags. Based on the PPEs quality, the PPEs need to be burnt or washed or buried. Otherwise, these bags should be placed into another bag, tied securely, marked (with date) and kept separate from other waste within the room. This should be put aside for at least 72 hours before being disposed of as normal.

#### **(e) Local Medical and Other Services**

- Given the limited scope of project medical services, the project may need to refer sick workers to local medical services. Liaise with the relevant local authorities and obtain information as to the resources and capacity of local medical services (e.g., number of beds, availability of trained staff and essential supplies).