

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

**Palli Karma-Sahayak Foundation (PKSF)  
Wage Earners Welfare Board(WEWB)**

**Recovery and Advancement of Informal Sector  
Employment (RAISE) (P174085)  
Additional Financing**

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

**Appraisal Version  
September 2025**

## **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Government of Bangladesh (GoB) (the Recipient) will implement the Recovery and Advancement of Informal Sector Employment Project (the Project), with the involvement of Palli Karma-Sahayak Foundation (PKSF) and Wage Earner Welfare Board (WEWB) (jointly, the Implementing Agencies or IAs). The International Development Association, (the Association) has agreed to provide financing for the Project as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreements or name position of designated official, e.g., minister, director of PKSF and WEWB. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The implementing agencies (IA) will maintain the PMUs at PKSF and WEWB with qualified staff and resources, acceptable to the Association, to support management of Environmental, Social, Health and Safety (ESHS) risks and impacts of the Project.</p>	Throughout Project implementation	IAs
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>The IAs, with the support of third-party resources <i>if</i> needed (independent experts, NGOs, etc.) will design and implement training for targeted groups involved in the Project to improve their awareness of ES risks and mitigate the impacts. This ESCP proposes a preliminary training plan covering the following topics. This plan will be adapted to meet needs during Project implementation.</p> <ol style="list-style-type: none"> <li>1. Training on <b>ESF, project operations manual (POM)</b> and the <b>10 Environment and Social Standards (ESS)</b>, including preparation of the <b>ES Management Plan (ESMP)</b>.</li> <li>2. <b>Occupational Health and Safety Module:</b> <ul style="list-style-type: none"> <li>• Workplace risk management</li> <li>• Prevention of accidents at work sites</li> <li>• Health and safety rules</li> <li>• Preparedness and response to emergency situations</li> </ul> </li> <li>3. <b>Labor and Working Conditions</b> <ul style="list-style-type: none"> <li>• Terms and conditions of employment according to national laws and regulations</li> <li>• Codes of Conduct</li> <li>• Worker’s organizations</li> <li>• Child labor and minimum age employment rules</li> </ul> </li> <li>4. <b>Grievance Redress Mechanism Module</b> <ul style="list-style-type: none"> <li>• Registration and processing procedure</li> <li>• Grievance redress procedure</li> <li>• Documenting and processing grievances</li> <li>• Use of the procedure by different stakeholders</li> </ul> </li> <li>5. <b>GBV Risk Module</b> <ul style="list-style-type: none"> <li>• Raising awareness and measures to prevent and mitigate GBV/SEA/SH risks.</li> </ul> </li> </ol>	Throughout the project implementation	IAs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></p> <p>The IAs will prepare and submit to the Association regular monitoring reports on environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	Submit half yearly (every six months) reports in an agreed format throughout Project implementation as part of Project Reports. The Project Report will be submitted within 45 days after the end of each calendar semester.	IAs
D	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>The IAs will notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including accidents that could result in fatalities, injuries, cases of GBV/SEA, serious mismanagement in handling waste, security breach, etc., provide sufficient details regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, the IAs will prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	IAs
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>i. PKSF's existing ESMS under the parent project was reviewed and recommendations made under ESS9 of ESCP. PKSF will revise their ESMS within one year of AF effectiveness as per recommendations. Until the revised ESMS is in place, the existing ESMS will be followed.</p> <p>ii. WEWB will update and adopt the parent Project's ESMF, and Labor Management Procedure (LMP) detailing policy, procedure and guidance for assessment and management of environmental and social risks and impacts of the AF.</p> <p>iii. Prepare and disclose E&amp;S assessments and screening for sub-projects as soon as they are known.</p> <p>iv. Upon activation of CERC, prepare a brief CERC-ESMF, update related E&amp;S instruments (SEP, ESCP, ESMF and Grievance Mechanism) as required.</p>	<p>i. PKSF ESMS updated and approved by PKSF senior management within two year of AF effectiveness and thereafter implement throughout Project implementation.</p>	<p>PKSF</p> <p>WEWB</p> <p>IAs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		<ul style="list-style-type: none"> <li>ii. WEWB existing ESMP, and LMP updated and adopted the within three months of AF effectiveness and thereafter implement throughout Project implementation.</li> <li>iii. E&amp;S assessments and screening developed and updated. PKSF E&amp;S team will conduct E&amp;S assessments and During appraisal of each sub-project.</li> <li>iv. Upon activation of CERC</li> </ul>	<p style="text-align: center;">IAs</p>
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Carry out consultancy, studies, capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	<p style="text-align: center;">IAs</p>
1.4	<p><b>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</b></p> <ul style="list-style-type: none"> <li>i. Ensure that the CERC Manual (if applicable), as specified in the original Financing Agreement and the AF Financing Agreement, includes a description of the E&amp;S assessment and management arrangements, in accordance with the ESSs.</li> <li>ii. Implement the E&amp;S provisions of the CERC Manual (if applicable).</li> </ul>	<ul style="list-style-type: none"> <li>i. The adoption of the CERC Manual, in form and substance acceptable to the Association, is a withdrawal condition under Section III.B.1(b) of Schedule 2 of the Original Financing Agreement and the Additional Financing Agreement for the Project.</li> <li>ii. In accordance with the timeframes specified in the CERC manual.</li> </ul>	<p style="text-align: center;">IAs</p>
1.6	<p><b>USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK</b></p> <p>The Project will utilize the existing PKSF ESMS as its primary framework for managing environmental and social risks and impacts of PKSF components. This ESMS has been reviewed and recommendations for its update have been made under ESS9 of this ESCP.</p>	Within one year of AF effectiveness	<p style="text-align: center;">IA (PKSF)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>PKSF will update its ESMS within two year of AF effectiveness, incorporating recommendations made under ESS9 and ensuring its alignment with the ESSs of the World Bank. The updated ESMS shall be approved by senior management.</p> <p>The Recipient shall ensure that any changes to the PKSF ESMS that may have an impact on environmental and social risk management for the Project are promptly notified to the Association. The Recipient further commits to implementing the ESMS, as updated and approved, throughout the Project implementation period.</p>		
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Implement the updated LMP for WEWB and LMP section of the PKSF ESMS of the parent Project.</p>	WEWB LMP disclosed with three months of AF effectiveness and measures will be implemented throughout Project implementation	IAs
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in LMP and ESMS.</p>	Prepare the OHS Management as part of the POM no later than 60 days after AF effectiveness and thereafter implement the plan throughout Project	IAs
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Maintain, and operate a grievance mechanism for the Project workers, as described in the LMP and ESMS</p>	Maintain and operate throughout Project implementation.	IAs
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>PKSF ESMF includes an exclusion list of interventions/ businesses that are not resource efficient and create pollution adversely affecting the environment. In addition, the Project Operations Manual (POM) specifies that any sub-projects with substantial and high ES risks will be ineligible.</p>	The updated POM will be approved prior to the commencement of Project activities by PKSF.	PKSF
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Assess and manage specific risks and impacts to the community arising from Project activities (entrepreneurship training, vocational training, mentoring, and access to microcredit to enhance employment opportunities of beneficiaries), e.g., behavior of Project workers, risks of SEA/SH, and implement mitigation measures in accordance with the ESMF and ESMS.</p>	Prior to the start of the activities and throughout the implementation of the Project	IAs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.3	<p><b>SEA AND SH RISKS</b></p> <p>Ensure the avoidance of all forms of Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA) by establishing written Codes of Conduct for all workers in Project areas as well as train and sensitize them on this issue. Prepare SEP and adopt and implement Project Grievance Redress Mechanism (GRM) under SEP as well as a labor related GRM under LMP. Project GRM will also manage the risks of GBV and SEA.</p>	Implement the SEA/SH Action Plan throughout Project implementation.	IAS
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>Not currently relevant</b>		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>PKSF ESMS includes an exclusion list so that potential business/microenterprise that may adversely affect biodiversity and living natural resources are not funded.</p>	ESMS (including exclusion list) disclosed prior to the commencement of Project activities by PKSF	PKSF
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p><b>INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS]</b></p> <p>ESS7 is relevant. However, as the Project will be implemented nationwide in urban and peri-urban settings, if any ethnic communities are identified, an Ethnic Community Plan will be prepared following the PKSF ESMS.</p>	Prior to the start of the activities and throughout the implementation of the Project	PKSF
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CULTURAL HERITAGE RISKS AND IMPACTS</b></p> <p><b>Not currently relevant</b></p>		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	<p><b>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</b></p> <p>PKSF's existing ESMS will be updated and address the following issues:</p> <p>(i) Develop a ES policy statement to assess and manage ES risks and impacts endorsed by the senior management; (ii) Enhance the capacity of the Environmental and Climate Change unit by recruiting/deploying (if required) additional Environmental and Social specialists (which may include gender/GBV specialist, climate change specialist, waste management specialist, biodiversity specialist, labor law expert, occupational health and safety specialist, stakeholder engagement specialist, field researchers); (iii) Develop training policy and training plan for staffs on E&amp;S issues and develop a complete training manual/ curriculum including audio visual presentations; (iv) Clear description of relevant national laws and their adoption in the ESMS; (v) Detail description of reporting requirement, channel and</p>	IA will ensure ESMS is updated, approved and disclose within two years of AF effectiveness.	PKSF PMU, POs and the Association

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	frequency of reporting and person responsible; (vii) Develop a beneficiary screening mechanism and format including women, people with disability and the vulnerable; (viii) update the institutional arrangement; (ix) Develop measures to address formation of labor/workers/employee organizations (x) Develop a guidance for legal agreement structure between the PKSf and its POs/ participating FIs, legally binding POs to adopt the ESMS.		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b> Maintain and implement SEP section of PKSf's existing ESMS. Disclose and adopt the updated WEWB SEP for the AF consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	WEWB and PKSf SEP will be will be implemented throughout Project implementation.	IAs
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Maintain, publicize and operate the existing grievance mechanism sensitive to SEA/SH, to receive and facilitate resolution of complaints and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant services.	Maintain and operate the existing GRM throughout Project implementation	IAs
<b>INDICATORS FOR IMPLEMENTATION READINESS.</b>			
The following actions are indicators for implementation readiness: 1. WEWB updates the ESMF and LMP within three months of AF effectiveness and implemented throughout the Project. 2. PKSf updates the ESMS within two year of AF effectiveness.			