



**BANGLADESH ECONOMIC ZONES AUTHORITY (BEZA)**

**BANGLADESH PRIVATE INVESTMENT & DIGITAL  
ENTREPRENEURSHIP PROJECT (PRIDE)**

**P170688**

**(Draft)**

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

**16 February 2020**

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

1. The Government of Bangladesh (**GoB**) will implement the Private Investment and Digital Entrepreneur Project (**PRIDE**) (the **Project**), with the involvement of the Bangladesh Economic Zones Authority (**BEZA**) (*Component 1-3*) and Bangladesh Hi-Tech Park Authority (**BHTPA**) (*Component 4*). The International Development Association (hereinafter the **Bank**) has agreed to provide financing for the Project.
2. **The GoB** will implement material measures and actions so that the Project (*Component 1-3*) is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. **The GoB** will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (**ESMP**), Environmental and Social Management Framework (**ESMF**), Labor Management procedures (**LMP**), Stakeholder Engagement Plans (**SEP**) etc and the timelines specified in those E&S documents.
4. **The GoB** is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Implementing Agency (**IA**) (**BEZA**) referenced in 1 above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the **Bank** by **GoB** as required by the ESCP and the conditions of the legal agreement, and the **Bank** will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the **Bank** and the **GoB**, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the **GoB** will agree to the changes with the **Bank** and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the **Bank** and the **GoB**. The **GoB** will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the **GoB** shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, social, safety impacts, labor influx, gender-based violence etc.

ENVIRONMENT AND SOCIAL COMMITMENT PLAN (ESCP)

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY
A	<p><b>REGULAR REPORTING</b></p> <p><b>BEZA</b> (Implementing Agency, IA) will prepare and submit to the Bank, 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), and Labour Management Procedure (LMP) including Occupational Health and Safety Measures (OHS).</p>	<p><b>Half yearly (by January 15 and July 15, every year),</b> reporting throughout the Project implementation</p>	<p><b>BEZA</b> – the Implementing Agency (IA)</p> <p>Monitoring and Evaluation budget is USD 180,000.00                      Budget for 2 Environmental Audit is USD 200,000.00                      Environmental Quality Monitoring during Operation Phase USD 10,000.00 (LS)                      Lab Test USD 750,000.00 for water, soil and air quality</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>The IA will promptly notify the Bank of any incident or accident related to Project such as cases of GBV/SEA, mismanagement in handling waste, security breach, death/disability etc. IA will provide sufficient detail 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 Bank’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Bank within <b>24 hours</b> of occurrence of such accidents or incidents. A report on action taken to be provided on the same to the Bank within <b>07 (Seven) days</b> of notification.</p>	IA
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>The IA will ensure submission of reports by the contractors on (i) employment numbers including new recruits and those who left (ii) cases of GBV reports (iii) cases of OHS related incidents (iv) reports received through GRM system (v) issues related to traffic incidents, noise and air pollution, communicable diseases (vi) safety and security breach (vii) training provided to workers</p>	<p>Monthly (by 10<sup>th</sup> of every following month)</p>	IA
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p>	<p>Recruitment process of these 3 (three) specialists (<b>ES, SDS, GS</b>) will</p>	IA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY
	<p>BEZA would appoint Environmental, Social Development Specialist and Gender Specialist in the PMU for undertaking ESA of various sub-projects as per ESMF and monitor implementation of ESMP. It will also ensure adequate Environmental and Social development specialists in the PMC.</p> <p>IA would establish a dedicated E&amp;S Unit and appoint adequate specialized staff tasked with the monitoring and compliance of developers, operators and unit investors.</p> <p>The IA would replicate, introduce and adopt the counsellor program of EPZ in EZs.</p>	<p>The plan for recruitment will be done before appraisal and the specialists will start working within 30 days of Project effectiveness. The permanent E&amp;S unit of BEZA would be established by 2021 as part of the component 1 of the PRIDE project.</p>	<p>Budget USD 300,000.00 for three years</p>
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>BEZA would recruit independent consultancy firms to undertake detail ESIA for all the large infrastructure for which ESA has been done with limited information during project preparation phase. This would include, among others, design and construction of CETP, sanitary landfill, construction of a biogas plant, waste sorting and material recovery facility.</p> <p>BEZA will follow the procedure set out in the ESMF to ensure environmental and social compliance of every sub-project for which detail information and or location is not known during project preparation stage.</p> <p>BEZA will update the Environmental and Social Assessment (ESA), if necessary under any changed conditions in future in a manner acceptable to the Bank.</p> <p>Project related associated facilities will need to be identified as per ESF and the IA will ensure all the Associated Facilities meet the criteria as specified in the ESF". Associated Facilities will need to meet the requirements of the ESSs, to the extent that BEZA has control or influence over such Associated Facilities. In cases where the requirements of the ESSs cannot be followed, the Bank will require BEZA to demonstrate the extent to which it cannot exercise control or influence over the Associated Facilities by providing details of the relevant considerations, which may include legal, regulatory and institutional factors. The Bank team with guidance from ESSA will review each case and the final decision will be taken on environmental and social due diligence of the Associated Facilities.</p> <p>BEZA will also carry out a Regional Environmental and Social Assessment (RESA) to examine the</p>	<p>ESIA: Throughout the project period and at least 15 days prior to issue of corresponding bids for work.</p> <p>RESA: by August, 2020</p> <p>Associated facilities screening and review: Throughout the project period</p>	<p>IA for ESIA and RESA.</p> <p>While the IAs would have primary responsibility for approving C-ESMPs and other E/S plans prepared by contractors, the WB should retain the option to review these as we deem appropriate and necessary</p> <p>IA and the Bank team for Associated Facilities' screening and review</p>

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY
	environmental and social risks and impacts, and issues, associated with a the series of past, present and foreseeable future projects, for the BSMSN and evaluate and compare the impacts against those of alternative options; assess legal and institutional aspects relevant to the risks, impacts and issues; and recommend broad measures to strengthen environmental and social management in the region.		
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>BEZA will draft, adopt and implement sub-project specific Environmental and Social Management Plan (ESMP) including LMP, SEP, GBV risk assessment and action plan in a manner acceptable to the Bank.</p> <p>BEZA will also prepare operational guidelines for Environmental and Social issues to be followed during construction and operation of new industries in the EZs.</p>	<p>Sub-project specific ESMP needs to follow the procedure require Bank’s prior review and approval before launching of the bidding process. Once approved, the instruments will be implemented throughout the project.</p> <p>Operational Guidelines before new industries commence the civil work in allocated plots in BSMSN 2A and 2B.</p>	IA
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>IA will ensure inclusion of all relevant conditions and Environmental, Social, Health and Safety (ESHS) specifications in the bidding documents. IA will thereafter, ensure that the contractors comply with the ESHS specifications of their respective contracts. The contractors will also need to have their own Labor Management Plan and C-ESMP.</p>	<p>Prior to the preparation of bid documents.</p> <p>IA will Supervise contractors throughout Project implementation.</p>	IA
<b>ESS 2: LABOUR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOUR MANAGEMENT PROCEDURES</b></p> <p>IA would ensure proper implementation of the Labor Management Procedure (LMP) prepared for the project. BEZA would ensure that necessary conditions are included in the bidding document to comply with the provisions set out in the Labor Management</p>	<p>LMP will be administered and implemented throughout project implementation period and will be duly monitored by IA.</p>	IA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY
	Procedure prepared for the project.		
2.2	<p><b>GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS</b></p> <p>Two GRMs have been suggested in the SEP (Project related including GBV and separate GRM for labor related issues). The IA will maintain and operate that GRM for Project affected parties, interested parties and workers, as described in the SEP and LMP.</p>	GRM will be operational prior to project effectiveness and maintained throughout the Project period.	IA
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>BEZA would include necessary conditions in the bidding documents and contracts to ensure occupational health and safety of the workers as specified in the ESMP and LMP.</p>	Same timeframe as for the preparation and implementation of the ESMP	IA
<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>IA would ensure implementation of ESMP for pollution prevention and would take initiative to reduce, reuse or recycle waste material to the extent possible. If this is not technically / financially feasible, waste would be treated, destroyed or disposed off in an environmentally safe manner as mentioned in the ESMP. IA would use renewable source of energy as feasible, recycle waste water from CETP and encourage the industry owner during operation phase to use resource efficient technology.</p>	Same timeframe as for the preparation and implementation of the ESMP	IA
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>IA would ensure preparation of a Traffic Management Plan by the contractors to assess and manage traffic and road safety risks as required in the ESMP. Contractor should update the traffic management plan as per the project need during the project tenure.</p>	The Plan will be developed as soon as the contract is awarded and will be maintained throughout the project.	IA
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p>	Same timeframe as for the	IA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY
	The IA has prepared an ESMP that includes measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, response to emergency situations, community health & safety, handling of hazardous material and wastes etc. These will be adopted and implemented in a manner acceptable to the Bank.	implementation of the ESMP	
4.3	<p><b>GBV AND SEA RISKS</b></p> <p>BEZA will prepare a stand-alone GBV Action Plan. The plan will include a separate grievance redress mechanism with GBV referral pathways and response protocol.</p> <p>BEZA will develop a code of conduct for contractors, subcontractors (hired by the contractor) that will cover gender-based violence risks and relevant service provisions in the bidding documents.</p>	Project GRM and GBV specific GRM will be established and will be operational before project implementation. The Stakeholders including the communities will be notified about the GRM within a month of project effectiveness.	IA
4.4	<p><b>SECURITY PERSONNEL</b></p> <p>Security in relation to securing of project infrastructure has been addressed in the ESMP. In case security personnel are deployed, the IA will prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank</p>	Prior to engaging security personnel and thereafter implemented throughout the Project	IA
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT PLANS</b></p> <p>The land area under BEZA (2A, 2B and IMD) is mostly reclaimed land and 2A and 2B areas have already been allotted to various industries. There will be no land acquisition required. However, the location of IMD area is yet to be known and hence information regarding any settlement in that area is to be verified after location is certain.</p>	<i>In case a RAP is required</i> , it will be prepared before the issue of bids. The draft RAP will be submitted for the Bank's approval and, once approved, implemented prior to commencing civil works activities.	IA
5.2	<p><b>GRIEVANCE REDRESS MECHANISM</b></p>	<i>(In case resettlement is required)</i> The project GRM will be used to	IA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY
	In case resettlement is required for IMD area, the project GRM that has already been prepared will be used to address issues to resettlement and acquisition.	handle land acquisition and resettlement related grievances.	
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>Water quality of Ichakhali canal and water from Feni river estuary would be tested to check that water it is not impacted from construction activities as mentioned in ESMP.</p> <p>The estuary of river Feni would not be disturbed for any project activity during the month of October which is pawning time for Hilisha fish.</p> <p>BEZA would ensure inclusion of necessary measures in the Operation Guidelines for the future industry owners to ensure that water of the near by waterbodies are not polluted from the effluent of the industries.</p>	<p>ESMP has already been prepared</p> <p>Once in a year</p>	IA
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p><b>INDIGENOUS PEOPLES PLAN</b></p> <p>Not Relevant</p>	Not relevant	
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS:</b></p> <p>No cultural heritage site is located in the project area. A chance finds procedure will be included in work contracts requiring contractors to stop construction if cultural heritage is encountered during any work and to notify and closely coordinate with relevant mandated country authority for the salvaging and restoration of such cultural heritage.</p>	During preparation of bid document	IA



	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	Not Applicable	NA	-
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>The IA has prepared an SEP. It will be adopted, updated from time to time as necessary and implemented.</p>	<p>The PMU will implement the SEP. In the process of implementation if newer stakeholders, risk/ impacts are identified these will be addressed with relevant stakeholders and remedial measures implemented after necessary consultation. These will be updated and will be disclosed through the IA websites. PMU will monitor the implementation of SEP and report it to the PSC, Bank and the stakeholders as per timeline given in the SEP.</p>	IA
10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b></p> <p>The IA has already prepared a Project GRM under SEP and will adopt, maintain and operate the same.</p>	As Above	IA

<b>CAPACITY DEVELOPMENT SUPPORT (TRAINING)</b>		
<b>Specify Training to be provided</b>	<b>Targeted Groups and Timeframe</b>	<b>Training Completed</b>
<p>In the ESA a Social, Environmental and Communication (SEC) cell has been recommended. This cell will work independently to monitor and supervise the ESMP for the project. The PMC will work under the PMU. The PMC will have qualified Environmental and Social specialists who will review the reports from the Design and Supervision Consultants and the Contractors on the implementation of the ESMP. During the project period, the Environmental and Social Consultants will be deployed under PMU. After ending the project fund, the positions will have to be in permanent status under BEZA under the permanent E&amp;S unit. Training shall be imparted, on a regular interval, to the BEZA officials and Staff on environmental and social issues. The ESMP document will be used as a training material for capacity building of BEZA officials/ staff and the Environmental &amp; Social Specialists will act as facilitators for the capacity building sessions. If needed, the training will be delivered through contracts arranged by the IAs. This ESCP proposes a preliminary training plan covering the following topics. This plan will be adapted to meet needs during Project implementation. The budget for training for three years is USD 150,000.00</p>		
<p><b>ESF. Training on ESF and the 10 ESSs including preparation of ESMP</b></p>	<p>Personnel directly related with project at BEZA head office and Filed office (if available)</p>	<p>Prior to Project effectiveness for 3 days and thereafter once a year</p> <p>Estimated Budget USD 3,000.00/yr</p>
<p><b>Occupational Health and Safety Module:</b></p> <ul style="list-style-type: none"> <li>• Personal protection equipment</li> <li>• Workplace risk management</li> <li>• Prevention of accidents at work sites</li> <li>• Health and safety rules</li> <li>• Waste management</li> <li>• Hazardous waste management e.g. fuelling of vehicles</li> <li>• Preparedness and response to emergency situations</li> <li>• Awareness campaign on HIV/AIDS</li> </ul>	<p>Local Officials of BEZA, PMC, Locally active NGOs, Contractors</p>	<p>Early stage of project implementation and continue half yearly throughout the project as required.</p> <p>Estimated Budget USD 6,000.00/yr</p>
<p><b>Labour and Working Conditions</b></p> <ul style="list-style-type: none"> <li>• Terms and conditions of employment according to national working laws and regulations</li> <li>• Contractor and sub-contractor codes of conduct</li> </ul>	<p>Local officials of BEZA, Contractors Health Safety Officer, Labour Sardars (Leaders)</p>	<p>Early stage of project implementation and continue half yearly throughout the project as required.</p>

CAPACITY DEVELOPMENT SUPPORT (TRAINING)		
Specify Training to be provided	Targeted Groups and Timeframe	Training Completed
<ul style="list-style-type: none"> <li>• Worker’s organizations</li> <li>• Child labour and minimum age employment rules</li> </ul>		Estimated Budget USD 9,000.00/yr
<p><b>Grievance Redress Mechanism Module</b>, design and conduct training module addressing the following aspects:</p> <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>	ES, SDS, GS, Local Governments, Civil Society, Local NGOs working with host population and, Contractors	<p>Early stage of project implementation and continue half yearly throughout the project as required.</p> <p>Estimated Budget USD 9,000.00/yr</p>
<p><b>Construction Waste Management:</b></p> <ul style="list-style-type: none"> <li>▪ Information about the risks, along with health and safety advice, see the World Bank Group Environmental Health and Safety Guidelines on managing construction waste and the relevant international good practices</li> <li>▪ Basic knowledge about handling procedures and risk management</li> <li>▪ Using protective and safety equipment</li> <li>▪ Information about the waste sorting process</li> <li>▪ Safe procedures for managing waste in dumps</li> <li>▪ Hazardous waste management</li> <li>▪ Refuelling procedure</li> <li>▪ Spillage of soil management</li> </ul>	ES, EHS, SDS, Contractors	<p>Early stage of project implementation and continue half yearly throughout the project as required.</p> <p>Estimated Budget USD 11,000.00/yr</p>
<p><b>GBV Risk Module</b></p> <ul style="list-style-type: none"> <li>▪ Raising awareness and measures to prevent and mitigate GBV risks</li> <li>▪ The topics, activities and targeted groups will be developed in the GBV</li> </ul>	BEZA Local officials, Contractors Health Safety Officer, Labour Sardars (Leaders), Local NGOs	Early stage of project implementation and continue half yearly throughout the project as required. Estimated Budget

<b>CAPACITY DEVELOPMENT SUPPORT (TRAINING)</b>		
<b>Specify Training to be provided</b>	<b>Targeted Groups and Timeframe</b>	<b>Training Completed</b>
Action Plan including GBV-specific GRM		USD 12,000.00/yr

