## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

## Chattogram Water Supply Improvement Project (CWSIP) [P176429]



## Chattogram Water Supply and Sewerage Authority

**19 February 2024** 

## **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

- 1. The People's Republic of Bangladesh (the Recipient) will implement the Chattogram Water Supply Improvement Project (CWSIP) (the Project), with the involvement of the Chattogram Water Supply and Sewerage Authority (CWASA) under Ministry of Local Government, Rural Development and Cooperatives (MoLGRD&C), as set out in the Financing Agreement and the Project Agreement. The International Development Association (the World Bank), has agreed to provide the original financing (P176429) for the Project, as set out in the referred agreement(s).
- 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 World Bank. The ESCP is a part of the Financing Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
- 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, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
- 4. As agreed by the World Bank and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through CWASA under MoLGRD&C and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Recipient. The Recipient shall promptly disclose the updated ESCP.

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
li	MONITORING AND REPORTING		
A	REGULAR REPORTING  Prepare and submit to the WB regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. The monitoring report would include, but not be limited to, information on the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s)	Every six-months during the Project's implementation in conjunction with the Project's progress reports commencing after the Effective Date.  Reports will be submitted no later than 45 days after the last day of each reporting period.  Effective throughout Project implementation	PMU
В	INCIDENTS AND ACCIDENTS  Promptly notify the Bank 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, and incidents of Sexual Exploitation and Abuse/ Sexual harassment (SEA/SH), 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 Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	Initially notification (for information) to be submitted to the World Bank within 24 hours of learning of the incident or accident.  A detailed report on the specific incident or accident (including classification of the incident and a detailed Root Cause Analysis (RCA) will be provided to the World Bank within 30 working days post the initial notification.	PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
		For incidents classified as 'Severe' or 'Fatal' a Safeguard Corrective Action Plan (SCAP) will be prepared and shared with the World Bank within 10 working days after the submission of the detailed report. On receiving World Bank's approval for the SCAP, the SCAP will be implemented for all sub-projects / activities under the Project.	
		Effective throughout Project implementation.	
С	CONTRACTOR'S REPORTS		
	Contractors and Supervising Firms will prepare monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit the same to the PMU  PMU will consolidate these monthly reports and prepare a detailed quarterly	Within 5 calendar days of the completion of the reporting month.	Contractor and Supervising Firms
		Within 10 calendar days of the completion of the reporting quarter.	PMU
	progress report and submit the same to the World Bank.	Effective throughout project implementation	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE		
	Establish and maintain a Project Management Unit (PMU) within CWASA.  The PMU will be responsible for managing overall project implementation.  Inter alia the PMU will also be responsible for ESHS management and compliance with the World Bank's Environment and Social Standards (ESSs) applicable for the Project. To manage the E&S issues in the project, CWASA	Established by the Effective Date and maintained throughout Project Implementation	CWASA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME RESPONSIBLE ENTITY/ AUTHORITY
	will hire - (i) An Environment Safeguards Specialist, and (ii) A Social Safeguards Specialist – and ensure that these specialists are in position throughout the implementation period and support the project in managing the project's E&S risks and impacts.	
1.2	ENVIRONMENTAL AND SOCIAL ASSESSMENT  1. Adopt and implement —an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plans (ESMPs) for — (i) the water supply improvements sub-projects, and (ii) sanitation improvement related sub-projects of the Project consistent with the applicable national laws, policies and regulations and the relevant ESSs.  2. Cause all contractors, sub-contractors and supervising firms engaged to plan, design, implement, operate and / or maintain investments, assets and activities related to — (i) water supply improvements sub-projects, and (ii) sanitation improvement sub-projects to adopt and implement the corresponding C-ESMPs for the sub-projects as set out in the respective ESMPs in the ESIAs.	1. ESIAs and ESMPs for Water Supply Improvements and Sanitation Improvement subprojects are in an advanced stage of preparation and will be finalized within 45 days of completion of negotiations between the Government of Bangladesh and the World Bank for the Project. Will be implemented throughout project implementation. ESIAs and ESMPs will be updated within 30 days of any changes in the E&S risks and impacts of the subprojects and the updated ESIAs will remain effective till the next changes (if any).  2. C-ESMPs to be finalized within 30 days of mobilization of the contractor, C-ESMPs to be approved by PMU and monitored throughout implementation of respective sub-projects

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
1.3	Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, management of GBV and SEA/SH risks, Safety Management Plans, Traffic Management Plans, Occupational Health & Safety (OHS) and Community Health and Safety (CHS) Plans, Traffic Management Plans, Waste Management Plans, etc. into the ESHS specifications of the bid documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	As part of the preparation of bid documents and respective contracts for sub-projects.  Supervise contractors throughout Project implementation	PMU
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility studies, if and as applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the World Bank and are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation	PMU
1.5	a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements in accordance with the ESSs. b) Adopt any environmental and social (E&S) instruments which may be required for activities under Contingent Emergency Response component of the Project, in accordance with the CERC Manual and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	a) The adoption of the CERC Manual in form and substance acceptable to the World Bank is a withdrawal condition under Section III.B.1.(b) of Schedule 2 of the Financing Agreement for the Project. b) Any required E&S instrument under CERC Financing will be included as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S	PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
		instrument is required.	
		The CERC E&S instruments will be implemented in accordance with their terms throughout Project implementation.	
	ASSOCIATED FACILITIES		
	If Associated Facilities are identified at any stage of the planning, design, implementation and / or operations and maintenance phases of the Project, CWASA will ensure that the owner / operator of the Associated Facility (if the owner / operator of the Associated Facility is / are different from CWASA) will carry out necessary activities in the Associated Facility in accordance with the applicable requirements of this ESCP and the ESSs, including, inter alia, the relevant E&S instruments prepared under the Project to manage the E&S risks and impacts of the Project.	Throughout project implementation	PMU
ESS 2:	LABOR AND WORKING CONDITIONS		
2.1	LABOR MANAGEMENT PROCEDURES  Adopt and implement the Labor Management Procedures (LMP) for the Project in accordance with the requirements of ESS2 and in a manner acceptable to the World Bank. The LMP will include, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	Project LMP has been prepared and disclosed. Contractors, subcontractors, consultants and supervising firms will need to adopt the Project LMP and, with required adjustments (if necessary), implement the LMP for their staff, consultants and workers.  Will be effective throughout Project implementation.	PMU and Contractors, sub-contractors consultants, supervising firms.

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY	
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS	GRM for Project Workers is a part of the LMP. The GRM will be	PMU and Contractors, sub-contractors	
	Establish and operate a grievance mechanism for Project Workers, as	operational before the involvement	consultants,	
	described in the LMP and consistent with ESS2. The grievance mechanism	of any Project Worker and will	supervising firms.	
	will be designed to also address labor related GBV and SEA/SH issues, including provision of a referral system.	remain effective throughout Project implementation.		
ESS 3	: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
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3.1	WASTE MANAGEMENT PLAN	Same timeline as 1.2	PMU	
	Carry out screening of sub-projects and based on the results of the screening			
	exercise, develop and implement Waste Management Plans (WMP) as a part			
	of sub-project specific ESMPs. WMPs will include measures to manage			
	hazardous and non-hazardous wastes consistent with ESS3 and in a manner acceptable to the Bank.			
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
		Same timeline as 1.2	PMU	
	Sub-project specific ESMPs prepared under actions listed in sections 1.2 and			
	3.1 of the ESCP will incorporate resource efficiency and pollution prevention			
	and management measures consistent with the requirements of ESS 3.			
ESS 4: COMMUNITY HEALTH AND SAFETY				
4.1	TRAFFIC AND ROAD SAFETY			
	Adopt and implement measures and actions to assess and manage traffic and road safety risks as a part of sub-project specific ESMPs	Same timeline as 1.2	PMU	
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	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
4.2	Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from subproject activities, including, inter alia, workers behavior, risks of labor influx, risks of SEA/SH incidents, emergency situations, infectious diseases, incidence due to use of services and include these measures as a part of the sub-project specific ESIAs and ESMPs. Though SEA/SH risk of the project is Low, the risk will be mitigated through PMU sensitization, awareness raising of communities, mapping of SEA/SH service provider, worker training and signing of Code of Conduct and establishment of workers' GRM (specified in the LMP) designed to prevent and manage SEA/SH issues.  The Project GRM will be accessible to communities and appropriate awareness building and sensitization activities will be undertaken to encourage communities to register their complaints / concerns (including those related to community health and safety) through the Project GRM for appropriate redressal.	Same timeline as 1.2	PMU
<b>ESS 5:</b> 5.1	RESETTLEMENT ACTION PLAN (RFP) / LIVELIHOOD RESTORATION PLAN (LRP)  The Project will not involve any land acquisition that will result in involuntary resettlement and rehabilitation of project affected persons. However, during the construction phase of the Water Supply Improvement and Sanitation Improvement sub-projects respectively, there might be a need to mitigate adverse impacts on informal settlers and non-titleholders and compensate for any temporary adverse economic and / or livelihood impacts on individuals and businesses in the project area. These impacts will be assessed prior to commencement of sub-project specific construction activities and if required, specific Resettlement Action Plans	The ESIAs and ESMPs for the Water Supply Improvement and Sanitation Improvement subprojects under the project include a Resettlement Policy Framework (RPF). The RPF provides detailed guidelines for preparation of RAPs or LRPs. Depending on the nature of the impacts, RAPs or LRPs shall	PMU and Contractors.

requirements of ESS 5 as described in the Project's Resettlement Policy Framework (RPF) shall be prepared and implemented.  commencement of construction activities and will be implemented in accordance with the timelines specified in the plans.  FRAPS or LRPs will specify the grievance redressal mechanisms that will be made available to individuals and businesses who are likely to be adversely impacted by sub-project activities under the Project. This grievance mechanism will also be responsive to SEA / SH.  ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES  The ESMPs will provide general guideline and procedures for managing impacts related to biodiversity and natural habitats  ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES - Not Relevant  ESS 8: CULTURAL HERITAGE  8.1 CHANCE FINDS PROCEDURE A detailed Chance Find Procedure (CFP) will be developed and included as a part of ESMPs.  ESS 9: FINANCIAL INTERMEDIARIES - Not Relevant		MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY		
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		, ,	Same timeline as 1.2	PMU		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE	ESS 9: FINANCIAL INTERMEDIARIES – Not Relevant					
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	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION  Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10. The SEP 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.	An SEP has been developed and will be finalized and disclosed prior to Project negotiations. Project SEP will be amended and updated every year till project completion and the updated SEPs will be publicly redisclosed.  Will be effective through Project Implementation.	PMU
10.2	Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, 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 gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	A Project specific GRM will be made operational prior to commencement of project activities. Till such time the project specific GRM is operational, the existing GRM in CWASA will be used to receive and address project related grievances.  Project GRM will be updated from time to time as needed and maintained throughout Project implementation.	PMU

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C	CAPACITY SUPPORT					
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All staff of the PMU, Contractors, sub-contractors, supervising firms and consultants will be given capacity building training and orientation on environmental, social, health and safety (ESHS) management following the national legal and policy requirements, international treaties, WHO guidelines and the World Bank ESF, with support of PMU E&S specialists and external experts (including World Bank's E&S Specialists). The PMU will design and implement training for targeted groups involved in the project to improve their awareness of E&S risks and mitigate the impacts. This ESCP proposes a preliminary training plan that can be adapted to meet needs during Project implementation according to the approved training plan and budget by the World Bank.

- CS 1. TRAINING: The following trainings will be provided to the relevant target groups, such as PMU staff, Project Workers, community representatives, consultants, contractors and sub-contractors:
  - Introduction to the World Bank's ESF
  - ESS 1 Environmental and Social Assessment (including, inter alia, E&S Risks and Impacts Screening, preparation of ESAs and ESIAs, importance of ESMPs, monitoring and reporting on ESMP implementation)
  - ESS 2 Labor and Working Conditions (including, inter alia, preparation of LMPs and monitoring and reporting on LMPs, ESHS Plan preparation, implementation, monitoring and reporting, OHS Plan preparation, implementation, monitoring and reporting)
  - ESS 3 Resource Efficiency and Pollution Prevention and Management (including preparation of Waste Management Plans, Pollution Prevention Measures, monitoring and reporting)
  - ESS 4 Community Health and Safety
  - ESS 5 Land Acquisition, Restrictions on Land Use, Involuntary Resettlement (general orientation and specific training on preparation, implementation,

All PMU Staff will be provided training on the World Bank's ESF and specific ESSs applicable to the CWSIP Project within 3 months of project effectiveness. Thereafter, depending on need, short refresher trainings on each of the applicable ESSs will be provided once every year till Project completion.

Consultants and contractors and subcontractors E&S experts, ESHS and OHS staff will be provided the required and relevant training within 2 months of Contract signing. Thereafter, depending on need, short refresher trainings on each of the applicable ESSs will be provided once every year till Project completion.

Community representatives will be provided orientation training on specific issues related to community health and safety, emergency preparedness, stakeholder engagement and information disclosure and use of Project GRM at least once every year till the completion of Project implementation.

PMU, External E&S Experts engaged by CWASA

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	<ul> <li>monitoring and reporting of RAPs and LRPs</li> <li>ESS 6 – General and specific training on Biodiversity Conservation and Sustainable Management of Natural Resources in the project context (if and as applicable)</li> <li>ESS 8 – Cultural Heritage (general orientation on avoidance of impacts on cultural and intangible heritage; specific training on preparation of Chance Find Procedures (CFPs), implementation of CFPs)</li> <li>ESS 10 – Stakeholder Engagement and Information Disclosure (including, hands on training on preparing and implementing SEPs, monitoring of and reporting on SEP implementation and grievance redressal management)</li> <li>Accident and Incident Reporting</li> <li>Emergency Preparedness and Response</li> <li>ESHS Audits and use of ESHS Audits findings to improve Project's E&amp;S performance.</li> <li>GBV/SEA/SH risk in the project and its implementation, need to understand and sign Code of Conduct</li> </ul>		