

# **The Government of the People’s Republic of Bangladesh**

Bangladesh Bureau of Statistics (BBS),  
National Board of Revenue (NBR),  
Planning Division (PD),  
Bangladesh Public Procurement Authority (BPPA),  
Office of Comptroller and Auditor General (OCAG)

Strengthening Institutions for Transparency and Accountability  
(SITA) (P506691)

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

**Appraisal Version**

**16 March 2025**

1. The People’s Republic of Bangladesh (the Recipient) will implement the Strengthening Institutions for Transparency and Accountability (SITA) (the Project), with the involvement of five Implementing Agencies(IAs): Bangladesh Bureau of Statistics (BBS) under ministry of Planning, National Board of Revenue (NBR) under ministry of Finance, Planning Division (PD) under ministry of Planning, Bangladesh Public Procurement Authority (BPPA) under Ministry of Planning, Office of Comptroller and Auditor General (OCAG) under Finance Division of Ministry of Finance as set out in the Original Financing Agreements (the Agreements). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in Agreements.
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. 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
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT<sup>1</sup></b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a Project Implementation Unit (PIU) at five Implementing Agencies (IAs) (BBS, NBR, PD, BPPA, and OCAG), each with qualified staff and resources to support the management of environmental, social, health, and safety (E&amp;S) risks and impacts of the Project. Each IA will nominate one E&amp;S focal point with the required qualifications from within its own organization. The Planning Division will hire an E&amp;S Specialist from the market or a competent officer (with experience and qualifications acceptable to the Association) from the Planning Division to coordinate and support all five E&amp;S focal points and prepare a consolidated monitoring report.</p>	Within 6 months of Effectiveness and thereafter maintain the PIU and these positions throughout Project implementation.	IAs
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>1. All Project workers (including for refurbishment works such as contractors) to receive training on:</p> <ul style="list-style-type: none"> <li>✓ Occupation Health and Safety (OHS)</li> <li>✓ Community Health and Safety (CHS)</li> <li>✓ Prevention of Gender based Violence/SEA/SH</li> <li>✓ Reporting on incidents and accidents and emergency preparation and response preparedness</li> <li>✓ stakeholder mapping and engagement</li> <li>✓ Grievance Mechanism especially for GBV/SEA/SH</li> <li>✓ Resource Efficiency and Pollution Prevention and Management</li> <li>✓ Waste Management</li> <li>✓ Environmental and Social Incident Response Toolkit (ESIRT)</li> </ul> <p>2. Labor Management Both PIUs Directors and staff to receive training on</p> <ul style="list-style-type: none"> <li>✓ ESF and implementation of environmental and social instruments</li> <li>✓ Stakeholder engagement and Grievance Redress Mechanism (GRM), including GRM for SEA/SH</li> <li>✓ GBV/SEA/SH</li> <li>✓ Resettlement and Land acquisition</li> <li>✓ Labor Management</li> <li>✓ Resource Efficiency and Pollution Prevention and Management</li> </ul>	<p>1. Throughout Project implementation, including when new workers are engaged.</p> <p>2. Within one month of the formation of the PIU, and then every six months for the first two years, and once a year for the remaining project period.</p>	<p>IAs</p> <p>IAs</p>
<b>MONITORING AND REPORTING</b>			

<sup>1</sup> For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the Project, including but not limited to-</p> <ul style="list-style-type: none"> <li>✓ Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>✓ Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>✓ Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>✓ E&amp;S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports.</li> <li>✓ Number and status of resolution of incidents and accidents reported under action E below.</li> </ul>	<p>Submit bi-annually progress reports to the Association throughout Project implementation, commencing six months after the Effective Date. PIU of Planning Division will submit the compiled progress report to the Association no later than 15 days after the end of each reporting period.</p>	<p>IAS</p>
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above.</p>	<p>IAS</p>
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details through ESIRT form upon request. Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	<p>IAS</p>
<p><b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b></p>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>Prepare subcomponent-wise site specific Environmental and Social Management Plans (ESMPs)/ESCoP as applicable. Incorporate the ESMPs/ESCoP and required Bill of Quantities (BoQ) as part of the bidding documents for the respective activities/components that require the preparation of such ESMPs/ESCoP.</p>	Upon screening and confirmation of project sites, implement the respective ESMPs/ESCoP throughout Project implementation.	IAS
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S assessments or plans, and code of conduct, into the E&amp;S specifications of the procurement documents and contracts with contractors. Thereafter ensure that the contractors comply and that they require their subcontractors to comply with the E&amp;S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/sub-contractors to the Association.</p>	<p>During preparation of bid documents and throughout Project implementation.</p> <p>Supervise contractors throughout Project implementation.</p>	IAS
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Not Applicable</p>		
1.4	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>Not Applicable</p>		
1.5	<p><b>ASSOCIATED FACILITIES</b></p> <p>Not Applicable.</p>		
1.6	<p><b>USE OF [BORROWER/RECIPIENT’S] ENVIRONMENTAL AND SOCIAL FRAMEWORK</b></p> <p>Not Applicable.</p>		
1.7	<p><b>COMMON APPROACH</b></p> <p>Not Applicable.</p>		
1.8	<p><b>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</b></p> <p>Not Applicable</p>		
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement the Labor Management Plan (LMP) in the ESCoP for the Project, including, 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.</p>	Same timeframe as for the preparation and implementation of the ESMPs/ESCoP	IAS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b> Adopt and implement an Occupational Health and Safety (OHS) Management Plan to assess and manage the OHS risks and impacts of the Project.</p>	Prior to commencement of any construction /physical works and thereafter implement throughout Project implementation.	IAS
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The existing grievance mechanism for project workers should be adopted until LMP is prepared. Grievance mechanism will be responsive to SEA/SH complaints.</p>	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	IAS
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b> Prepare and implement an E-Waste Management and Disposal Plan (E-WMDP)), ensuring environmentally sound handling, transportation, and disposal of e-waste, as part of the ESMPs/ESCoP prepared for the Project.</p> <p>For activities which are likely to generate waste, noise and dust, prepare and implement a Waste Management Plan (WMP) and known engineering and housekeeping measures to be included as part of the ESMPs/ESCoP prepared for the Project, consistent with ESS3.</p>	<p>The E-WMDP shall be prepared, disclosed, consulted, and adopted before carrying out the relevant Project activities, and thereafter implemented throughout the project</p> <p>Same timeframe as for the preparation and implementation of the ESMPs/ESCoP</p> <p>The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities and shall thereafter complied with throughout the project</p>	IAS
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the ESMPs/ESCoP to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMPs/ESCoP.	IAS
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks as required in the ESMPs/ESCoP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP/ESCoP.	IAS
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, waste, noise, air, and waste water emission, and include mitigation measures in the ESMPs/ESCoP.	Same timeframe as for the preparation and implementation of the ESMPs/ESCoP	IAS
4.3	<b>SEA AND SH RISKS</b> Prepare and implement a Code of Conduct (CoC) as part of the ESMPs/ESCoP	Same timeframe as for the preparation and implementation of the ESMPs/ESCoP	IAS
4.4	<b>SECURITY MANAGEMENT</b> Not applicable.		
4.5	<b>DAM SAFETY (FOR ANNEX A ESS4)</b> Not applicable		
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT FRAMEWORK</b>  Not Applicable		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Not Applicable		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<b>INDIGENOUS PEOPLES PLAN</b> Not Applicable		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b> Not Applicable.		
8.2	<b>CHANCE FINDS</b> Not Applicable.		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	<b>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</b> Not Applicable.		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b> Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant,	Prior to Appraisal and thereafter implement the SEP throughout Project implementation.	IAS

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	understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.		
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>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.</p> <p>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.</p>	Within one month of the PIU formation and thereafter maintain and operate the mechanism throughout Project implementation. Until the GRM is effective, the IA's own GRM will receive and address the grievances following the due process.	IAs
<p><b>INDICATORS FOR IMPLEMENTATION READINESS</b> [This subsection lists the ESCP actions (by their numbering in the first column of the ESCP) that are identified as relevant to monitor project readiness from an E&amp;S standpoint. These may include actions related to: i) establishment of E&amp;S risk management units in the Project Implementation Entities, ii) recruitment and training of E&amp;S staff within Project Implementation Entities, iii) Memorandums of Understanding or other written agreements/arrangements between Project Implementation Entities and other concerned agencies to ensure proper coordination of E&amp;S risk management activities; iv) E&amp;S effectiveness or disbursement conditions, if deemed warranted, v) ES assessments and plans to be prepared by the Borrower at the onset of implementation; vi) other project-specific requirements related to E&amp;S readiness for implementation].</p>			
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> <li>✓ ESMPs/ESCoP prepared and implemented</li> <li>✓ PIU with requisite E&amp;S Consultants/Specialist in place</li> <li>✓ Project GRM in place</li> <li>✓ For civil works to start: screening per the ESMPs/ESCoP and Exclusion List in the ESMPs/ESCoP.</li> </ul>			