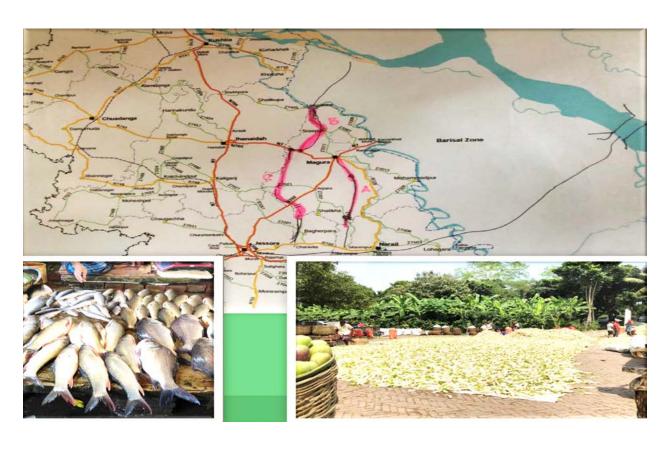


# Government of the People's Republic of Bangladesh Local Government Engineering Department (LGED) <a href="www.lged.gov.bd">www.lged.gov.bd</a>

# Western Economic Corridor & Regional Enhancement Program (WeCARE)

Project ID no: P169880



**Environmental and Social Management Framework** 

January 2020

#### List of Acronyms

ADB Asian Development Bank

AIDB Asian Infrastructure Development Bank
ARAP Abbreviated Resettlement Action Plan

ARIPA Acquisition and Requisition of Immovable Property Act

BBS Bangladesh Bureau of Statistics

BDT Bangladeshi Taka

BMP's Best Management Practices

BN Bangladesh Navy

BOD Biological Oxygen Demand

BP Bank Policy
BP Bank Procedures

BRE Brahmaputra Right-bank Embankment
BWDB Bangladesh Water Development Board

CBO Community Based Organization

CC Climate Change

CEAP Construction Environmental Action Plan

CG Coast Guard

CHT Chittagong Hill Tract

CIIA Cumulative and Induced Impact Assessment
CNGO Coordinating Non-Governmental Organization

COD Chemical Oxygen Demand
CPR Common Property Resources
CSO Civil Society Organizations

DAE Department of Agriculture Extension
DCRO Deputy Chief Resettlement Officer
DIA Designated Implementing Agency

DIFE Department of Inspection for Factories and Establishments

DLS Department of Livestock Services
DoE Department of Environment
DoF Department of Fisheries

DPCC District Project Coordination Committee

DSM Design Supervision Management
EA Environmental Assessment
ECA Ecological Critical Area

ECA Environmental Conservation Act
ECC Environmental Clearance Certificate
ECoP's Environmental Code of Practices
ECR Environment Conservation Rules
EHS Environmental, Health and Safety
EIA Environmental Impact Assessment
EMF Environmental Management Framework

EMIS Environmental Management Information System

EMP Environmental Management Plan EMU Environmental Management Unit

EMU Environnent Management Unit ERP Emergency Response Plan ES Environmental Screening

ESA Environmental and Social Assessment
ESCP Environmental Social Commitment Plan
ESDU Environmental Social Development Unit
ESF Environmental and Social Framework

ESIA Environmental and Social Impact Assessment

ESMF Environmental and Social Management Framework

ESMP Environmental and Social Management Plan ESMP Environmental and Social Management Plan ESMU Environment and Social Management Unit

ESR Environmental Screening Report
ESS Environmental and Social Standards

ETP Effluent Treatment Plant

EU European Union FAA Flood affected area

FAO Food and Agriculture Organization

FAP Flood Action Plan

FGAP Framework for Gender Action Plan

FGD Focus Group Discussion

FPIC Free, Prior and Informed Consent FRSS Fisheries Resource Survey System

FSECDP Framework for Small Ethnic Community Development Plan

GAP Gender Action Plan
GBV Gender Based Violence
GDP Gross Domestic Product

GDR General Department of Resettlement
GHAB Galda Hatchery Association of Bangladesh

GMB Ganges, Brahmaputra and Meghna

GoB Government of Bangladesh

GPN Good Practice Note

GRC Grievance Redress Committee GRM Grievance Redress Mechanism

ha Hectare HH House Hold

HIES Household Income and Expenditure Survey

IA Information Access

ID Identity

IDA International Development Association
 IEE Initial Environmental Examination
 IFC International Finance Corporation
 ILO International Labor Organization

IoL Inventory of Loss
IP Indigenous Peoples

IPDP Indigenous Peoples Development Plan

IPP Indigenous Peoples' Plan

IPPF Indigenous Peoples Planning Framework

ITLOS International Tribunal for Law of the Sea
IUU Illegal, Unreported and Unregulated
IWM Integrated Water Management
JCC Joint Coordination Centre
JVC Joint Verification Committee

L.O.A Length Over All

LAO Land Acquisition Officer
LAP Land Acquisition Plan

LGED Local Government and Engineering Division
LGED Local Government Engineering Department

LGI Local Government Institution
LMP Labour Management Procedures

LMS Land Market Survey

LRSP Livelihood Restoration Support Plan

M Motorized

M&E Monitoring and Evaluation

MCS Monitoring, Control and Surveillance
MEF Ministry of Economy and Finance
MIS Management Information System

MLGRD&C Ministry of Local Government, Rural Development and Co-operatives

MoD Ministry of Defence

MoEFCC Ministry of Environment, Forest and Climate Change

MoF Ministry of Finance
MoFA Ministry of Foreign Affairs

MoFL Ministry of Fisheries and Livestock

MoHA Ministry of Home Affairs

MoLE Ministry of Labor and Employment

MoLGRDC Ministry of Local Government, Rural Development and Co-operatives

MoRTB Ministry of Road Transport and Bridges

MoU Memorandum of Understanding

MPA Multi-Phased Approach

MT Metric Tonne

MWB Minimum Wages Board

NATP National Agricultural Technology Project

NGOs Non-Government Organizations

NM Nautical Mile NM Non Motorized

NOC No Objection Certificate

NRS National Resettlement Specialist
O&M Operation and maintenance
OHS Occupational Health and Safety

OHSC Occupational health and Safety Circle/Cell
OHSM Occupational health and safety management

OP Operational Policy PA Protected Area

PAD Project Appraisal Document
PAH Project Affected Households
PAP's Project Affected Persons

PAU Project Affected Unit
PCU Program Coordination Unit
PIB Public Information Brochure
PIU Project Implementation Unit
PMO Project Management Office

PPE Personnel Protective Equipment

PPR Project Progress Report
PRA Participatory Rural Appraisal
PSC Project Steering committee

PVAC Property Valuation Advisory Committee

Project Management Unit

R&D Research and Development

RAC Resettlement Advisory Committee

RAP Resettlement Action Plan RCS Replacement Cost Study

RHD Roads and Highways Department

ROW Right of Way

**PMU** 

RPF Resettlement Policy Framework
RTIP Rural Transport Improvement Project

SA Social Assessment
SAE Sub Assistant Engineer
SDE Sub Divisional Engineer

SEA Strategic Environmental Assessment

SEC Small Ethnic Community

SECDP Small Ethnic Community Development Plan

SECI Social and Environmental Circle

SEMVPP Small and Ethnic Minorities, Vulnerable Peoples Plan

SEP Stakeholders Engagement Plan
SIA Social Impact Assessment
SIMP Social Impact Management Plan
SMF Social Management Framework

SMP Social Management Plan

TBD To Be Determined

TDP Tribal People Development Plan
TIG Technical Implementation Group

ToC Table of Contents
ToR Terms of Reference

TPDR Technical Publication Deficiency Report

TPP Tribal People Planning

UNCED United Nations Conference on Environment and Development

UNCLOS United Nations Conference on Law of the Sea UPCC Upazila Project Coordination Committee

USD United States Dollar
VLD Voluntary Land Donation

WB World Bank
WBG World Bank Group

WeCARE Western Economic Corridor and Regional Enhancement Program

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#### **Executive Summary**

#### **Background**

The Government of Bangladesh (GoB) through the Ministry of Finance (MoF) has requested the World Bank (WB) to support the preparation and implementation of the Western Economic Corridor and Regional Enhancement Program (WeCARE Program) with the Roads and Highways Department (RHD) and the Local Government Engineering Department (LGED) as the main implementing agencies. RHD will implement the widening and traffic safety improvements of the western corridor from Jashore — Jhenaidah — Bonpara — Hatikumrul corridor and Bhomra — Satkhira — Navaron corridor totaling to about 233 km of regional roads. LGED will implement construction, rehabilitation and improvements of priority rural roads and market infrastructures in 6-7 districts in the Western Region. The exact locations of these roads and market infrastructures are not known at this point. The program is envisaged to be implemented in phases and could run from 10-12 years of implementation. The Program would be implemented in three phases. The first phase of this project will follow the same component structure as the overall program and will finance the upgrading of national highways from Jashore to Jhenaidah (48 km) and associated feeder roads and rural market infrastructure along this part of the corridor, and road transport sector modernization interventions.

The project is conceived as an economic corridor, thus it is expected to have a strong focus on the resulting economic benefits for the communities living around the core infrastructure. This will be accomplished by using a network approach to corridor development—developing an appropriate mix of investments in trunk infrastructure and strategic auxiliary infrastructure in the districts that form part of the overall corridor. To this end, the Government has made policy decisions to develop some of the growth centers around the country with concept of providing several services including markets, health and education facilities and others but keeping the natural beauty and bio-diversity to the indigenous and genuine rural essence. Such an approach is consistent with international experience on the role of "central places" as nuclei for rural transformation and mitigate migration from rural to urban cities LGED is piloting this new strategic thrust in some districts, though none of them are in the proposed WeCARE project area.

The number, type and locations of the LGED component interventions will be decided over the project implementation stage. Beneficiary groups and sites for any small infrastructures will be known in the implementation level and therefore, social issues and impacts could not be identified and specified for mitigation at the preparation stage. LGED will screen sites for project interventions and identify the target group beneficiaries at the implementation level for preparation and implementation of any social action plans. Hence, there is a need for procedural guidance for social preparation and management. LGED has therefore prepared Environmental and Social Management Framework (ESMF) as a constituent part for guidance in the implementation stage.

#### Overview of the ESMF

This Environmental and Social Management Framework (ESMF) is needed to screen the environmental and social risks and impacts of the LGED-led activities and provide guidance in the preparation of specific assessments and plans for the subprojects during implementation, including implementation of any plans. The ESMF is intended to be used as a practical tool during program formulation, design, implementation, and monitoring in WeCARE. 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.

LGED has implemented a number of projects on rural roads and bridges, rural waterways and growth center markets, including the Second Rural Transport Improvement Project (RTIP2) and the Program for Results on Rural Roads and Bridges financed by the World Bank. As an active client of the Bank, LGED has developed a number of environmental and social instruments to manage the E & S risks and impacts of the projects in accordance with World Bank safeguard policies and requirements. An Environmental Management Framework (EMF) and Social Impact Management Framework (SIMF) were developed for RTIP1 and RTIP2, which were updated during the processing of an Additional Financing for RTIP2. These frameworks, however, were developed following the World Bank's old safeguard policies, which will no longer apply to the WeCARE Program. The new Environmental and Social Framework (ESF) of the World Bank will be applied to WeCARE. In this regard, the EMF and SIMF for the existing Bank-financed project with LGED has been updated to become the ESMF and meet the requirements of the ESF. In addition, the World Bank has conducted a capacity assessment of RHD and LGED under this project, which also needs to be reflected in the ESMF in the relevant sections.

#### **WeCARE Program Description**

The Project Development Objectives (PDOs) of the project is 'to improve connectivity and rural logistics along a regional transport corridor in Western Bangladesh; and strengthen road sector management'.

The Program will include Ten (10) Districts namely Jashore, Jhenaidah, Magura, Satkhira, Kushtia, Pabna, Natore, Chuadanga, Meherpur and Sirajganj. However, Phase I funded by WB will include the ROW only in the Jashore-Jhenaidah segments and its connecting rural roads and GCs.

The WeCARE Program will have the following five (5) components:

Component 1 - Upgrading National Highway Corridor and Enhancing Digital Connectivity: This component will be implemented by RHD. The activities will include upgrading the following 260km of national and regional highways: (i) Bhomra-Satkhira-Navaron; (ii) Jashore- Jhenaidah; and (iii) Jhenaidah-Bonpara—Hatikamrul. This will encompass upgrading of existing two-lane road from to four lanes. Separate Slow-Moving Vehicle Traffic (SMVT) lanes will be introduced on both sides of the main carriageway. This component will also finance the laying of Optical Fiber Cable (OFC)/utility duct alongside the road corridor. For this project that constitutes the first phase of a Multi-Phased Approach, the improvements of the 48-km Jashore — Jhenaidah road will be supported.

Component 2 - Upgrading Rural Roads and Enhancing Digital Connectivity: This component will be implemented by LGED. The activities will focus upgrading of priority Upazila and Union roads that connect to the program corridor, schools, health facilities, and local markets and Collection centers. The selection of roads to be supported by the project will be guided by an assessment of connectivity needs of program corridor to markets to hinterland that will be undertaken during project preparation. In addition, the component will also finance Optical fiber cable duct for select Upazila roads.

**Component 3 - Developing Complementary Logistics Infrastructure and Services:** This component will be implemented by LGED to improve infrastructures including development of community market structures (with a focus female participation) for fresh produce (fruits, vegetables, dairy, and poultry). This component will finance complementary logistics infrastructure improvements, including

development of community market structures (with a focus female participation) for fresh produce (flowers, fruits, vegetables, dairy, and poultry).

Component 4 - Improving Road Sector Management And Institutional Capacity: This component will be designed based on a comprehensive sector diagnostic to identify the gaps in policy, regulatory, institutional and operation level including review of ongoing institutional reforms (both in RHD and LGED) as part of the projects financed by ADB and JICA; and GoB's own institutional reform to arrive at a series of sustained TAs as sub-components of this ambitious reform exercise.

**Component 5 - Contingent Emergency Response:** This component will improve the GoB's ability to respond effectively in the event of an emergency in line with WB procedures on disaster prevention and preparedness. Following an eligible crisis or emergency, the Recipient may request the Bank to reallocate project funds to support emergency response and reconstruction. This component would draw from other project components to cover emergency response.

In light of the above Phase I will include-

- Upgrading of the 48-km Jashore to Jhenaidah Corridor (RHD)
- Upgrading and rehabilitation of feeder roads (Length to be determined after feasibility) (LGED)
- Complementary socio-economic infrastructure improvement e.g. Market infrastructures and logistics (LGED)
- Supporting Sectoral and institutional reforms and Technical assistance (RHD & LGED)
- Contingent Emergency Response (RHD & LGED)

#### Sub-project Types (Typology)-LGED Component

The Typology of LGED subproject includes:

- Improvement and Modernizing of potential Growth centers, Markets and Ghats in Program districts (Jashore, Jhenaidah, Satkhira, Magura, Chuadanga, Kushtia, Pabna, Meherpur, Natore and Sirajganj)
- Improvement, widening and capacity enhancement of LGED Feeder Roads as CORE ROAD;
- Improvement of village/farm/hinterland roads aligned to CORE ROADs;
- Integrate and connect the Railway stations to the road network with the best possible connectivity;
- Improvement of new and possible linkage with proposed Economic Zone;
- Integrate Road with Riverine/Water route, Multimodal Transport;
- Improvement or Construction of road connected with markets with hinterlands and also improvement of collection hub or collection center at or near to alignments proposed for improvement. These hub or collection center will reduce post-harvesting loss and will ensure an effective value chain;
- Laying of "Fiber Optic Cable" that will be engraved along the proposed alignment;
- Landscaping at Market Places, Bridge approaches, road dividers and other spaces;
- Construction of Road Safety infrastructures
- Solar powered automated railway crossing;

Detailed features of the sub-project typology are described in section 2.4.

#### Applicable Environmental, Social and Safeguards Regulations (GoB and WB)

All relevant national policies, strategies, plans, acts, rules and regulations laid out by the Government of Bangladesh pertaining to the environment and social aspects are briefly discussed in Annex A. Summary of GoB and WB ESSs applicability is furnished in Table 3.1, 3.2 and 3.3.

The legislations relevant for environmental assessment for WECaRE-LGED components are the Environmental Conservation Act 1995 (ECA'95) and the Environmental Conservation Rules 1997 (ECR'97). Article-12 of Environment Conservation Act '1995, the key act governing environmental protection in Bangladesh, states that 'No industrial unit or project shall be established or undertaken without obtaining, in the manner prescribed by rules, an Environmental Clearance Certificate from the Director General (of Department of Environment, DoE)' and one of the key procedures to obtain the Environmental Clearance Certificate is to undertake an effective and expert environmental assessment. As part of a government entity, LGED is obliged to abide by all these acts and rules, in addition of other GOB acts, rules or guidelines.

Overall, the proposed project is targeting to intervene a wide range of environmental elements covering a vast area of rural environment, with rehabilitation/construction of higher quantity of small scale infrastructures, improvement/modernizing/construction of potential Growth centers, Markets and Boat Ghats, laying of "Fiber Optic Cable" and construction/ rehabilitation of rural roads may fall under the schedule 'Orange-B and very few in Red Category' based on ECR '97 of DoE.

According to the WB ESF standards criteria and those requirements, all ESSs will be applicable in the WeCARE program, except the ESS 9: Financial Intermediaries. Legal policies of the World Bank on Projects on International Waterways (OP 7.50); and Project Disputed Areas (OP 7.60) are not applicable to the project.

#### **Environmental and Social Baseline Condition**

The baseline condition of environmental and social context at the sites of the sub-projects will serve as the basis for identifying, predicting and assessing impacts during the detail ESIA. Hence, a detailed baseline survey will be carried out during the preparation of subprojects as part of the subproject-specific ESIAs or ESMPs. However, a preliminary baseline conditions has been generated in Chapter 4, based on the secondary information and reconnaissance field visit within the proximity of the LGED sub-projects area covering the administrative districts. In addition, information collected during the baseline survey by RHD ESIA team has also been used to enrich the chapter with authentic primary observation at this ESMF stage. Baseline condition has been described in light of the two broad categories viz.

Description of the Environmental Baseline (includes both Physical Environment and Biological Environment) and Description of the Social and Economic Baseline (includes Socio-economic and Cultural Environment).

#### Potential Key Environmental and Social Impacts of the Sub-projects

The overall impact assessment of the proposed project activities of WeCARE sub-projects to be implemented reveals that most of the likely adverse impacts could be minimized or eliminated by adopting standard mitigation measures. There is also scope to enhance some of the beneficial impacts to be generated from the proposed project. The potential impacts of the LGED sub-projects on the key environmental and social parameters that have been identified as part of the ESMF are listed in Table

5.5, which has also analyzed in according to the ESS1 risk categories based on the significance of each impacts following the criteria defined in Sub-section 5.1.1 and Tables 5.1 to 5.3. In the subsequent sections, these impacts are discussed and guidelines for mitigation included for the ESMF of the WeCARE LGED sub-projects.

#### **Environmental and Social Management Procedures**

WeCARE sub-projects will use a structured approach to environmental and social management to allow the project development process following the newly developed 10 ESSs, follow the mitigation hierarchy of avoidance, minimization, mitigation and compensation/offset for negative impacts and enhancement of positive impacts where practically feasible. Due to the nature of some of the proposed sub-project activities under WeCARE program and potential environmental and social impacts, the project falls under 'Orange B or RED' category according to ECR, 1997 and also falls under "Substantial to Moderate Risk Project' as per the World Bank ESS1, which requires proper IEE, ESIA and implementation of environmental and social management plan.

The ESIA will utilize a well-planned and all-inclusive communication and consultation strategy and include a baseline survey covering the prevailing status of income, employment, education, age, skills and other socio-economic aspects along with cultural and community aspects in the areas. A separate Stakeholders Engagement Plan (SEP) has been prepared for LGED sub-projects, which will be followed during preparation and implementation. The assessment will feed into the individual Resettlement Plans prepared for each site and will be incorporated, along with consultation feedback from those identified in the PAP census and all other relevant stakeholders, in the development of mitigation measures, especially livelihood strategies. LGED will undertake a survey for identification of the persons and their families likely to be affected by the project. LGED on completion of the assessment will disseminate the results among the affected community. Based on the assessment, project will prepare an action plan to mitigate or minimize the adverse impacts as identified during the survey.

The draft mitigation plan in form of resettlement action plan (RAP) will be again disseminated among the affected individuals/ community. The feedback received from the affected groups will be incorporated to the extent possible before finalization of the RAP. When ESIA identifies small ethnic communities with distinct characteristics different with the mainstream population of the country, a special approach will be followed as per the Bank ESS7 on indigenous peoples, if any. A free, prior and informed consultation approach will be followed for meaningful consultation with the small ethnic communities and identification of their priorities for additional measures for maximizing project benefits to them. Measures will be taken to avoid any adverse social effected to these communities and a small ethnic community development plan (SECDP) will be prepared for following implementation of the project activities in areas inhabited by small ethnic communities. Procedure of RAP has been discussed in the RPF and those for preparation of SECDP in the SECDF presented in stand-alone volumes. However, the WeCARE Phase I area has no such small ethnic community those required attention to develop SECDP/SECDF.

<u>Various environmental and social management plans (ESMP) will be prepared for the WeCARE</u>. The major activities and the relevant responsibilities for each sub-activity are shown in Table 6.3. However, according to the project planning, the activities those need ESIA will be implemented at different

periods and hence, multiple ESIAs would be required clustering the similar activities prior to the actual intervention start.

The ECoPs consist of environmental management guidelines and practices to be followed by the contractors/ implementation organizations for sustainable management of all environmental issues. The contractor will be required to follow them and also use them to prepare site-specific management plans. Possible environmental impacts during pre-construction phase from construction, rehabilitation and maintenance activities should be identified beforehand. Detail activities need to be identified first and thereafter set of actions or interventions are to be demarcated and any possible effect due to an action is to be determined. Best practice mitigation or enhancement measures should be explored accordingly and deployed in the field. For giving an instance, a set of mitigation measures against possible environmental and social impacts due to an improvement project at its pre-construction, construction and post-construction phases is proposed in the Table 6.8a, 6.8b and 6.8c.

The monitoring plan is the key element of ESMP to be prepared on the basis of 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. The Plans for the WeCARE, Phase I will be prepared and included in the ESIA; similar plans will be prepared for the later phases and included in the associated ESIAs. Table 6.9 presents the sample format of these plans. An overview of monitoring requirement of the key environmental and social impacts described in Chapter 5 is given in Table 6.10. As one of the key elements of the ESMP, a three-tier monitoring program is proposed comprising compliance monitoring, effects monitoring, and external 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 also to evaluate program impacts on the key environment parameters. LGED will engage an independent consulting firm to conduct external and independent monitoring of the ESMP implementation. The main purpose of the external monitoring will be to ensure that all the key entities including EU, DSM, PMC and contractors are effectively and adequately fulfilling their designated role for ESMP implementation, and that all the ESMP requirements are being implemented in a timely and effective manner.

For evaluating the performance of the environmental 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. DSM will be responsible for compiling the information on these indicators and report to LGED.

Total US\$ 3.5 million is estimated for implementation of ESMP which should be embedded in the proposed total project budget from IDA. The Development Project Proposal (DPP)/Technical Assistance Project Proposal (TAPP) of LGED/MoLGRDC for the proposed program should reflect the ESMP activities with budget for successful environmental management of the program.

#### **Institutional Framework**

The success of the proposed environmental and social assessment depends on the clear identification and allocation of responsibilities and functions, as well as the capability of the project management team in collaboration with other agencies, to take proper actions throughout the various stages of the proposed project activities. The following organizations may involve during the implementation of LGED

projects: Environmental Unit of Local Government and Engineering Department (LGED); Department of Environment (DoE); Forest Department(FD); LGED; Bangladesh Water Development Board (BWDB); Roads & Highways Department (RHD); Bangladesh Agricultural Extension (BAE); Bangladesh Road Transportation Authority (BRTA); Bangladesh Inland Water Transport Authority (BIWTA); Local Administration (District/Upazila/Union); Community based organizations; and various Non-government organizations.

The process of ESIA as well as the monitoring of the ESMP involves substantial linkage and coordination between various line agencies. The LGED (Environment Unit) will play a vital role in coordinating and managing this process. This organizational integration and cooperation is very important for environmental assessment, reporting, management and the monitoring process for the large number of upcoming projects under the LGED. The LGED will also liaise with the local NGOs, for grassroots level work with project affected communities. To ensure the environmental sustainability, the LGED has already established an Environmental Management Unit (EMU), headed by a Superintending Engineer.

The WeCARE implementation will be led by the Project Implementation Unit (PIU) that will be established within LGED. The PIU will be headed by the assigned Project Director (PD). Further details of the institutional arrangement for the overall WeCARE management should be available in the ESMP of specific IEE/ESIA report for WeCARE, Phase I under the Institutional Arrangement volume. As LGED has already set-up an EMU (Environmental Management Unit) with qualified staff in its regular organogram, this EMU under the leadership of a LGED officer will assist the PIU (i.e. PDO) on issues related to environmental and social management by forming a formal Social, Environment, and Communication Committee (SECC). EMU/SECC will oversee the Design Supervision Management (DSM)/Project Management Consultants and other contractors (to be engaged in project activities implementation) and will compile quarterly monitoring reports on ESMP compliance, to be sent to the Project Director and also shared with the World Bank, throughout the project implementation period. The EMU/SECC will also provide trainings to the LGED field personnel responsible for monitoring of environmental compliance during both implementation and subsequent post project period of the program. Thus, smooth transition to LGED will happen to ensure environmental compliance during the post project period. The organogram for ESMF implementation arrangement is shown in Figure 7.1.

#### Capacity Building Plan

A separate Capacity Building Plan (CBP) for the LGED WeCARE has been prepared under the Capacity Assessment Bangladesh/WB which will the main guiding document to build capacity of LGED for implementing the ESMF. However, this ESMF have suggested some additional capacity building requirements which in case of redundancy must be avoided and the above mentioned CBP will be prevailed. Table 7.2 provides a summary of various aspects of the indicative environmental and social trainings to be conducted at the construction site. LGED may revise the plan during the program implementation as required. During the post project period of the program, these trainings will continue to be conducted by LGED staff for all relevant personnel and community.

#### Stakeholder Engagement and Disclosure

During the preparation of the present ESMF, initial consultations with the key stakeholders have been carried out at 5 sites covering 2 (two) districts to obtain their views on program interventions. A summary of consultation meetings are given below Table 8.2. However, field surveys, consultations with

different stakeholders, focus group discussions (FGDs) that were carried out to develop this ESMF of WeCARE LGED sub-projects, are not enough considering the project area and dimension of the stakeholders. Extensive field visits are required at the ESIA stage to overcome this shortcoming and conduct extensive discussions with the relevant stakeholders throughout the program sites to discuss components, sub-components, activities, potential positive and negative impacts and measures taken to mitigate those impacts. It is also required to record the views of each of the respondents of the consultations, irrespective of gender, profession, religion, and age groups. The ToR of the ESIA should be described in the public meetings during the initial stage of the ESIA in all the sites of the proposed project. Findings of the ESIA will also be presented in local language going back to the same stakeholders while the draft is ready to submit for DoE clearance. Consultation meetings are necessary to identify issues and problems to enable LGED to include corrective measures and to identify lessons and opportunities to enhance program implementation mechanism.

A separate Stakeholders Engagement Plan (SEP) has been prepared for WeCARE which will be the main guiding document for the LGED sub-projects. Similarly, LGED will address gender issues through approaches that are participatory and responsive to the needs of the poor, particularly when it involves management of fisheries resources. However, a separate standalone Gender Based Violence (GBV) report will be prepared and disclose by LGED, to address the ESS requirement.

#### **Grievance Redress Mechanism**

A separate GRM has been proposed under the RPF, which will guide the project GRM during implementation. The WeCARE program will establish a grievance redress mechanism (GRM) for addressing grievances and complaints received from the program -affected persons due to environmental issues. Grievance Redress Mechanism (GRM) is a valuable tool which will allows affected people to voice concerns regarding environmental and social impacts for WeCARE's activities. LGED would ensure that grievance redress procedures are in place and would monitor those procedures to ensure that grievances are handled properly. The LGED office will establish a procedure to answer subprogram -related queries and address complaints, disputes, and grievances about any aspect of the subprogram, including disagreements regarding the assessment and mitigation of environmental and social impacts.

#### **Information Disclosure**

The mechanism of information dissemination should be simple and be accessible to all. Two of the important means that have been followed until now include briefing material and organization of community consultation sessions. The briefing material (all to be prepared in local language) can be in the form of (a) brochures (including project information, details of entitlements including compensation and assistance to be given to the PAPs; grievance mechanism) that can be kept in the offices of local self-government (gram parishad office) and project office; (b) posters to be displayed at prominent locations and (c) leaflets that can be distributed in the project areas. Consultation meetings should also be organized at regular intervals by the project to acquaint the communities, target group beneficiaries and affected persons on various aspects. Disclosure of information will enhance governance and accountability specifically with respect to strengthening of monitoring indicators to help the World Bank monitor compliance with the agreements and assess impact on outcomes. The draft ESMF of WeCARE will be disclosed to the local and national level stakeholders through different methods as described in the 'Access to the information system'. Summary of the IEE, ESIA and ESMF report along with ESMP will

be translated into Bengali language and disseminated locally. The full report (in English) and the summary (in Bengali) will also be uploaded in the website of LGED and World Bank. Hard copy of the IEE, ESIA and ESMF will also be available at LGED District and Upazila offices of the program area.