



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Bangladesh	SOUTH ASIA	P173022	
Project Name	Dhaka North Neighborhood Upgrading Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	12/7/2020	5/18/2021
Borrower(s)	Implementing Agency(ies)		
Economic Relations Division, Ministry of Finance	Dhaka North City Corporation		

Proposed Development Objective(s)

To enhance public space and improve urban services in selected neighborhoods in Dhaka.

Financing (in USD Million)	Amount
Total Project Cost	106.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The Dhaka North Neighborhood Upgrading Project will help Dhaka transform into a more liveable and competitive city through the improvement of public spaces and urban services in select neighborhoods. Investments will focus on clusters of streetscapes, parks and open spaces and community centers, introducing principles of placemaking, pedestrian safety, and energy and resource efficient buildings to strengthen urban resilience. The project will also provide support to the city corporation to improve asset and revenue management and improve the efficiency and access to select citizen services.

Public Disclosure



D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The Project is proposed to upgrade public spaces in selected neighborhoods in Dhaka North City Corporation (DNCC). The metropolitan city of Dhaka was divided into two City Corporations in 2011 namely Dhaka South City Corporation (DSCC) and Dhaka North City Corporation (DNCC). These two city corporations were expanded in May 2016 with 8 more neighboring Union Parishads each. The expanded DNCC now occupies about 200 sqkm comprising of 54 wards. Dhaka is known for extreme traffic congestion and air pollution with equal consequences in DNCC and DSCC areas. Currently air pollution is a severe environmental and public health concern in Dhaka city. Average vehicular traffic speed is about 6 kmph and it is progressively reducing over time. This congestion is mainly a consequence of inadequate infrastructure and public transport relative to the high population and economic density. The city is also highly prone to water logging caused due to unregulated urban expansion affecting the natural drainage system. These factors directly contribute to very low livability in Dhaka, especially the poor and middle income groups, the women, children, elderly and persons with disabilities, among others. Public spaces and transports for city commuters are alleged to be unfriendly for women, girls and persons with disabilities. The proposed Project responds to the city's demand and aims to improve pedestrian mobility and safety including better management of intersections, bus bays, wider footpaths, safer zebra crossings, and road quality improvements. Improving public, open and green spaces is also included for facilitating safer urban environment for the poor, women and girls and persons with disabilities. The Project activities will largely be limited to existing available lands. But unused public spaces are not generally vacant and there are authorized, and unauthorized occupants might be in many areas. The neighborhoods and exact locations of interventions will however, be selected in the project implementation stage. With this context, an Environmental and Social Management Framework (ESMF) based on overall environmental and social (ES) assessment of the project will be carried out before the appraisal.

D. 2. Borrower's Institutional Capacity

The proposed project is expected to have one implementing agency: Dhaka North City Corporation (DNCC). The DNCC is an urban local body headed by elected Mayor and appointed Chief Executive Officer (CEO). Administratively, the DNCC reports to the Local Government Division (LGD) of the Ministry of Local Government, Rural Development and Co-Operatives. A dedicated Project Implementation Unit (PIU) will be setup within DNCC shouldering overall responsibility for implementing the project, including technical, operational, environmental and social, procurement, financial management, public awareness and communication activities. The PIU will be headed by a Project Director (PD) and staffed with experts on technical, fiduciary, environmental, social, and other relevant fields. Engineering design, project supervision, contract management, and monitoring and evaluation (M&E) consultants will also support the PIU.

LGD and DNCC are familiar with Bank's pre-ESF, the PIU representatives attended ESF borrower trainings and they have also past experience with WB safeguard policies and processes and has a reasonable track record of implementing the Bank's safeguard policies. They are currently implementing the Bangladesh Urban Resilience Project (P149493), the Municipal Governance and Services Project (P133653) and the similar nature of project Dhaka City Neighborhood Upgrading Project (P165477). However, ESF is relatively new to DNCC and LGD. A detailed capacity and risk assessment for the implementing agency will be conducted and appropriate mitigation capacity building measures will be determined during appraisal. The ES assessment will also consider overall design of the project to mitigate likely ES risks.



II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Moderate

It is anticipated from the scope of the project that significant irreversible environmental risk will not be involved from project interventions. The interventions include minor civil works and design the major environmental impact will emanate from generation of construction wastes, air and noise pollution, worker’s health and safety, community health and safety, etc. from construction/ refurbishment activities. These risks can be mitigated through proper design and implementation of relevant Environmental and Social Management Plan (ESMP) for each sub-project. Since the nature, degree of impact, exact location and specific design of the sub-projects will not be known at appraisal stage, a framework approach is adopted. The framework includes all necessary guidelines for addressing environmental issues along with issues. The PIU will hire environmental expertise, and all ESMPs will be reviewed and cleared by the Bank before the sub-projects are implemented. The sub-project-specific Environmental Codes of Practice and ESMPs with cost and special environmental clauses will be incorporated in the bidding documents for civil works. Environmental issues will be integrated into the project GRM.

Given the scale of the project, nature of environmental risk and impact, capacity of IA to manage the risk, context under which the project will be implemented, the environmental risk is classified as Moderate. Sub-projects with environmental risks higher than moderate will not be eligible for financing under the project without changing the risk rating. However, in accordance with the ESF, the risk classification can be reviewed and be changed (if necessary). Any change to the classification will be disclosed on the Bank’s website.

Social Risk Rating

Substantial

The project will involve neighborhood level improvement of public spaces including roads, streets and sidewalks, parks and green areas, waterfronts, playgrounds, plazas, squares, and markets, bus and vessel terminals, community centers, libraries, and the like. The neighborhood level network of improved and connected streets and refurbished public spaces will improve livability with better economic and social environment and new opportunities including better access to education, health and safety. The networks are existing streets, buildings and open spaces and the improvement activities will not involve any involuntary acquisition of land. The project will adopt all-inclusive citizen engagement approach and avoid unintended social impacts to the extent feasible. However, there may be encroachers and formal and informal users of existing public spaces. Although the informal users of public spaces are subject frequent eviction, the current practice of the DNCC in eviction of squatters and encroachers does not meet the requirements of the WB’s standard on involuntary resettlement (ESS5). The project will also induce risks related to workers safety and working environment (ESS2), impact on community health and safety (ESS4), gender/disability, SEA/SH and labor influx. These risks and impacts will be assessed during project preparation and instruments will be prepared for assessment and management of subproject specific risks and impacts following the WB ESF and corporate requirements on gender, citizen engagement and SEA/SH. Overall, limited institutional capacity of DNCC in managing social issues as per WB requirements, ownership issues of existing public spaces, and the likelihood of formal and informal private users of existing land are challenges to the project’s implementation.

Given the scale of the project, nature of social risks and impacts, institutional capacity of DNCC to manage the risks, the social risk to the project is rated as Substantial.

Public Disclosure



B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

This Project is going to finance constructions/ restoration/rehabilitation of a number of infrastructures, related utility facilities, green areas, water body restoration etc. for increasing the livability status of the City. The location of various interventions and designs are yet to be known.

Environmental and social risks from civil works activities largely within existing footprints are described under environmental and social risk classification above. These include occupational and community health and safety, generation of solid, liquid and hazardous wastes, air and noise pollution, vibration impacts on structures from earth works and movement of equipment and vehicles, potential physical displacement, permanent or temporary impact on livelihoods of the affected people, labor influx, inclusion issues for the women and the persons with disabilities and exposure to communicable diseases, likely generation of SEA/SH, traffic and road safety concerns and community health and safety of those living around the project areas. Depending on the location of selected sites there is a likelihood that a small number of squatters will be displaced partially or fully, temporarily or permanently. Except the traditional weaver community in Mirpur neighborhoods, no cultural heritage/ archeological sites and no tribes, minor races, and ethnic sects of indigenous characteristics are likely to be present around the project sites. Since the locations and designs are yet to be known, an ESMF based on the generic ESIA of the project area and an RPF will be prepared which will include assessments of the potential environmental and social risks, institutional capacity, and identification of disadvantaged and vulnerable people in the context of the project. The ESMF and RPF will include criteria and processes for screening of sub-projects based on environmental and social risks, and preparation of ESMPs and RAPs. Once the specific design and location will be known, the sub-project specific ESIA along with ESMPs and RAPs will be prepared following the guidelines of ESMF and RPF in line with the relevant ESSs. A clear procedure will be included into the ESMF and RPF on how to address construction induced environmental and social impacts during implementation.

In addressing applicable ESSs, in consultation with the Task Team, the borrower will prepare ESMF, RPF, generic ESIA/ESMP and SEP before appraisal. The borrower will also prepare an environmental and social commitment plan (ESCP) which includes timeline for preparing required documents such as site specific ESMPs, RAP, Labor Management Procedures (LMP), Project Grievance Redress Mechanism (GRM), etc. The ESCP will specify various actions to be carried out during implementation. Due diligence will be completed during preparation to assess all potential impacts and risks through consultations with stakeholders and appropriate assessments.

Areas where “Use of Borrower Framework” is being considered:

Borrower’s framework will not be used for this project.

ESS10 Stakeholder Engagement and Information Disclosure

Given the nature, scale and complexity of the Project, stakeholders’ engagement and consultation are necessary identifying project affected and other interested parties and engage them in the project process from identification to planning, design and implementation. The stakeholder consultation, especially the community consultation will be



started at an early stage of project preparation and design to help identifying the priority of the community needs and especially the needs from vulnerable communities and populations.

The stakeholders in addition to the DNCC and the residents of the city corporation, include (but not limited to) Local Government Division (LGD), Ministry of Local Government, Rural Development and Cooperatives, utility services organizations for water, sewerage, gas and electricity, internet service providers, cable TV service providers, markets, hospitals and clinics, convention halls, restaurants, hotels, educational institutions, police, transport operators, private vehicle owners, rickshaw pullers, auto drivers, car drivers, ride share providers, cyclists, Department of Labor, Department of Environment, public and private transport operators and users, taxi drivers and owners, transport workers/unions, women and child rights group, disabled and vulnerable persons, educationists, students, environmental activists, sports clubs, national and international contractors, labor contractors, suppliers, and communities/inhabitants around the project areas. Stakeholder engagement will be a critical tool for social and environmental risk management, project sustainability and success.

In consultation with the Bank, the DNCC will prepare, consult upon, and implement an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts. The SEP will include relevant measures for communications with the citizens and stakeholders and pay attention to the identification of vulnerable groups, particularly women and persons with disabilities, and will facilitate and monitor their participation in the process. The SEP will include a Grievance Redress Mechanism (GRM) that will be set up with related communications channels and tools. As part of the environmental and social impact assessment, the DNCC will maintain and disclose a documented record of stakeholder engagement, including a description of the stakeholders consulted and a summary of the feedback received. The draft SEP will be prepared for the Appraisal stage ESRS.

Main stakeholder inputs relate to project design, job creation, participation and differentiated measures for vulnerable groups, equal opportunities for all to access project benefits, concern regarding SEA/SH, and safety and security of the local inhabitants. These concerns will be addressed through Contractor bidding and contract process (e.g. requirements for labor management plans, Code of Conduct for workers, etc.), through the project GRM, and through monitoring environmental and social risks and impacts by DNCC and adherence to ESCP.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will need to engage a significant number of workers to complete construction/ restoration/ rehabilitation activities. The total number of such civil construction workers, however, is expected to be, at any given time, below 100 in one site. Given the availability of local labor the usual labor influx related risks and impacts are not likely to be as significant as in rural setting. The national legal and regulatory framework on labor is almost in line with Bank standard but its enforcement is weak and it covers only the direct wage laborers. It does not cover the management and policy level staff, primary supply workers or the community workers. DNCC will however, include regulatory review and analysis of its compliance with the Bank standard. It will prepare appropriate labor management procedures (LMP) with code of conducts of project staff in compliance with the national legal framework and the



Bank standard. The site specific LMP will address the way project workers will be recruited, assigned and managed. Non-discrimination and equal employment opportunities, especially for women and people with disadvantage will be taken in to cognizance. It also warrants that safety and security of the workers are carefully planned and implemented through Occupational Health and Safety (OHS) principles given in ESS 2, industry-specific EHSs and other GIIP. PIU will prepare an OHS management plan before implementation of any civil works and it will be embedded in the sub-project ESMPs. The OHS requirements will be stipulated in the ESMF. Further, usual security concern due to labor influx, such as potential SEA/SH incidents, adverse alternation of local dynamics (such as employment, power status), communicable diseases from the labor would also need to be taken into cognizance. The salient issues and requirements will be addressed in the ESIA/ESMF and appropriate actions will be incorporated in the ESCP and in Contractors documents. A separate GRM will be provided for addressing the labor related disputes. The labor management procedures will be updated prior to project implementation, if additional labor protections are needed.

ESS3 Resource Efficiency and Pollution Prevention and Management

The construction/ rehabilitation/ restoration work will require resources (water, energy and raw material including aggregate, cement, steel, etc.). Acquisition and utilization of these materials demand careful planning and execution. In addition to resource efficiency requirement of this ESS, DNCC will need to adopt measures specified in EHS to optimize resource usage, to the extent technically and financially feasible. Recycling and reuse of materials will also need to be planned.

Air quality: Air quality may be affected to various degrees due to construction activities and movement of construction vehicles and machineries. The operation of construction equipment and vehicles will contribute to air pollution releasing hazardous air emissions such as NOx, SOx, CO, PM2.5, PM10 and other SPM. Construction works involve breaking up, digging, crushing, transporting and dumping large quantities of stones/bricks, sand and cement. It will inevitably lead to an increase in SPM in and around the construction areas unless proper measures are undertaken.

Surface and Ground Water: There are a number of water bodies, canals in the city area. Water of these canals can be contaminated through discharge of construction waste as well as solid and liquid waste generated from the labor camps if not properly managed.

Impact on Soil: The soil near construction sites may be polluted due to improper storage of construction materials and wastes produced during construction work. Soil can also be polluted from accidental oil spillage from construction vehicles and public vehicles, liquid and solid waste from construction camp.

Noise: During the construction phase, noise level could be increased as a result of various construction activities such as piling work, transportation of construction materials and operation of various equipment.

Measures to be in place to see if generated wastes can be reused, recycled or recovered and if not technically / financially feasible these have to be treated, destroyed or disposed off in an environmentally safe manner.

Provision for taking care of these issues will be included in the site specific ESIA and ESMPs.

ESS4 Community Health and Safety

Project activities may expose the communities in the neighborhoods to health and safety risks as well as inconvenience in movement during construction. The construction, restoration and rehabilitation will be small and



medium civil works but across wider areas. This will give rise to increased traffic for movement of construction vehicles and diversion of traffic leading to additional congestions in the already congested city. This may cause inconvenience to the city dwellers and increase the risk of road accident. Lack of road safety measures, training of drivers and conditions of vehicles may affect those living around the construction sites and adjacent road network. The construction work will also generate noise, vibration and pollution which may also pose health risk to the local communities. Project will generate both non-hazardous and hazardous waste throughout the construction phase. During construction, the anticipated non-hazardous wastes would include excavated material, various construction debris, municipal solid waste and waste water. Hazardous waste may include used oil, empty drums or replaced parts of the construction machinery, used battery, chemical used for concreting like admixture etc. These might have impact on human health and on the surrounding environment.

Given the availability of local resident labor, the Influx of labors may not have as detrimental an affect had it been in a rural isolated setting. However, the employment of labor dotted around the city for various construction/ restoration work may give rise to communicable diseases, SEA and SH. These will be assessed in the site specific ESIA and the contractor(s) will be required to prepare a Community Health and Safety Plan and will be embedded in the sub-project ESMPs.. Adequate traffic management, provision of alternative access points/roads, road crossing safety procedures be put in place. The ESIA will identify and recommend adequate engineering, health and safety measures to avoid any issue on community health, including potential impacts from labor influx. Mechanism will be developed for reporting any accidents, or fatalities on the sites immediately as they may occur. The potential exclusion risk of persons with disabilities will be assessed both from the aspects of infrastructure design as well as transport services, as per the concept of universal access. WBG EHS guidelines will be followed in the preparation of the ESIA and all labor related plans. During operation, road safety and community health and safety are anticipated to significantly improve with the installation of safety features on widened roads. When site specific information will be known a detailed assessment will need to be carried out and mitigation measures need to be included in the ESMP and the ESCP. Waste management and the minimization of potential impacts during construction will depend on the implementation of appropriate procedures, protocols and monitoring of materials being delivered, handled and stored prior to disposal. The Contractors' ESMP (CESMP) will include detail procedure for managing environmental and social risks during construction work.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Project interventions for development of public spaces in selected neighborhoods will be designed based on an inclusive process of public consultation and participation. Project activities will be limited within existing available lands and acquisition of private lands will be avoided. Attempts will be made to avoid neighborhood sites with high density of formal or informal settlers/squatters. But displacement of squatters and encroachers may not be completely avoidable in situations of critical design requirements. Informal and mobile street vendors in bus and river terminals may also be impacted due to the the project interventions. The exact locations of sites for project interventions and design information will only be known at the implementation stage. DNCC will develop a Resettlement Policy Framework (RPF) to deal with any likely involuntary resettlement issues associated with the project design and implementation. The RPF provides guidance for social screening and, where necessary, to carry out detailed, site-specific social impact assessments and subsequently prepare Resettlement Action Plans (RAP) for project activities, once specific site locations are identified and designs are finalized.



ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project area in urban setting of the city is unlikely to contain and critical habitat given the information at hand at the moment. The intervention for water body conservation and restoration, introduction of green space etc is likely to increase the assemblage of flora and fauna in the long term. The overall impact on natural resources and natural biodiversity will be positive.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The project areas are in Dhaka city and there is no settlement of small ethnic communities in any of the neighborhoods.

ESS8 Cultural Heritage

The specific project sites are yet to be known but in the general area of the project activities it is unlikely that it will contain any specific cultural heritage, animal reserve, legally protected areas, archaeological sites.

ESS9 Financial Intermediaries

No financial intermediaries will be engaged in this project

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

No financing partners is expected.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

As substantial E&S risk project, following documents will be prepared prior to Appraisal.

- Preparation, consultation and disclosure of an ESIA and ESMF
- Preparation, consultation and disclosure of RPF
- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP)
- Preparation and disclosure of Environmental and Social Commitment Plan (ESCP)



- Preparation and disclosure of Labor Management Procedures (LMP)

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

The following aspects will be a part of the ESCP:

- Implementation of relevant measures, and other ESF-related plans such as ESMP, RAP, LMP, SEP, etc.
- Preparation and disclosure of relevant additional E&S instruments, if any during project implementation;
- Institutional arrangement for E&S aspects including establishment of E&S cell in DNCC (staffing and capacity building cost for E&S management, communication strategies, and monitoring plan).

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

24-Dec-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Economic Relations Division, Ministry of Finance

Implementing Agency(ies)

Implementing Agency: Dhaka North City Corporation

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Shenhua Wang
Practice Manager (ENR/Social)	Christophe Crepin Recommended on 16-Mar-2020 at 11:30:2 EDT
Safeguards Advisor ESSA	Agi Kiss (SAESSA) Cleared on 21-Apr-2020 at 00:04:36 EDT

Public Disclosure