Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 03/26/2020 | Report No: ESRSC01223
## BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bangladesh</td>
<td>SOUTH ASIA</td>
<td>P172817</td>
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</table>

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bangladesh Environmental Sustainability and Transformation Project</td>
<td>Investment Project Financing</td>
<td>5/28/2021</td>
<td>9/28/2021</td>
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<thead>
<tr>
<th>Borrower(s)</th>
<th>Implementing Agency(ies)</th>
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<tbody>
<tr>
<td>People's Republic of Bangladesh</td>
<td>Ministry of Environment, Forest and Climate Change</td>
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### Proposed Development Objective(s)

To strengthen environmental governance and to reduce pollution discharges from key sources at selected areas of Bangladesh.

### Financing (in USD Million)

<table>
<thead>
<tr>
<th>Total Project Cost</th>
<th>Amount</th>
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<tbody>
<tr>
<td></td>
<td>250.00</td>
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</table>

### 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]

At the concept stage, the project is considering to support four components of activities. These proposed components and activities will be further defined during project preparation.

**Component 1: Strengthening Environmental Governance.** This component will support the MOEFCC and DOE to implement policy and institutional reforms; carry out technical studies; develop various strategies/plans; procure environmental monitoring equipment and develop field-level offices with laboratory facilities; train its staff on technical subjects; and promote public awareness, environmental information disclosure and citizens’ engagement in
its efforts to improve environmental monitoring and enforcement in the country. The design of this component will be based on recommendations of the 2018 CEA and broad stakeholder consultations during project preparation.

Component 2: Air and Water Quality Management. This component will support investments at key pollution sources to reduce the generation and release of air and water pollutants and thus contributes to air and water quality improvement. It has two subcomponents: air quality management (AQM) and water quality management (WQM). These sub-components will focus on pollution hotspots of the greater Dhaka area given the significance of its air and water pollution issues. For the AQM subcomponent, the focus will be on (a) the transformation of brick production from clay-fired to non-fired cement block production in key brick production areas of the greater Dhaka area; (b) emission reduction from the transport sector in Dhaka; and (c) control of dusts and open burning in Dhaka. For the WQM subcomponent, the focus will be on reducing effluent discharge of targeted industrial sources (industries, industrial clusters, industrial zones) through the adoption of resource efficient and cleaner production technologies and the installation and operations of effluent treatment plants.

Component 3: Plastics and Waste Management. This component will support plastics management, hazardous and electronic wastes management at selected localities. Existing and new recycling, storage, treatment and sustainable disposal facilities may be supported to better manage such wastes.

Component 4: Project Management. This component will support MOEFCC/DOE and related implementing agencies to properly manage their respective project implementation.

D. Environmental and Social Overview
D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
At the concept stage, it is likely that Dhaka, Gazipur, Narayanganj and Narsingdi would be potentially selected for different project interventions. This will be confirmed during project preparation. It is expected that project areas will be located in existing urban and industrial areas. Nevertheless, the proposed operation will have countrywide and multi-sectoral impact for both public and private sectors. Component 1 aims at strengthening environmental governance at the national level; Component 2 will support investments at key pollution sources to reduce the generation and release of air and water pollutants. AQM investments will focus mainly on brick kilns in the identified priority area and vehicle emission control in the Dhaka metropolitan area. WQM investments will focus on selected catchments and water bodies of the Dhaka metropolitan area. Component 3 aims at improving hazardous and electronic waste issues of Dhaka and Narayanganj while plastics related interventions may be implemented at the national level.

D.2. Borrower’s Institutional Capacity
The MOEFCC is the nodal ministry for this project and has assigned the DOE to manage overall preparation of the project. The MOEFCC/DOE agreed to establish a dedicated team to work on project preparation. While Components 1, 3 and 4 will be implemented by the DOE directly, the MOEFCC/DOE has agreed to establish collaboration and engage other institutions to implement specific investments under Component 2. For Component 2, the implementing agencies will be (a) the Bangladesh Bank for industrial investments, (b) Dhaka North and South City Corporations (DNCC, DSCC) and Dhaka Transport Coordination Authority (DTCA) for transport related investments, and (c) DNCC and DSCC for dust control investments. During project preparation a detailed capacity assessment will
be performed to identify capacity gaps of these agencies in managing project implementation and recommend actions needed to help these agencies address their capacity gaps during project preparation and implementation. The MOEFCC/DOE is familiar with Bank’s safeguard policies and processes. The MOEFCC/DOE has recently implemented the Clean Air and Sustainable Environment (CASE) Project and has a reasonable track record of implementing the Bank’s safeguard policies. Similarly, the Bank financed Municipal Governance and Services Project and Dhaka City Neighborhood Upgrading Project are currently under implementation with DNCC and DSCC respectively. DTCA is also implementing a component under the Dhaka Traffic and Transport Improvement Project. However, the Bank’s Environmental and Social Framework (ESF) is relatively new for them. Managing the environmental and social issues dedicated and skilled human resource (HR). The Technical Assistance for Project Preparation (TAPP) resources will be used to set up a project management unit (PMU) with adequately trained staff. During project implementation, the project will finance the MOEFCC/DOE to implement agreed environmental and social (E&S) instruments with adequate budgetary provision.

A detailed capacity and system assessment will be performed during project preparation to evaluate how well the MOEFCC/DOE is prepared to implement project activities to meet the ESSs requirements. The outcomes of the assessment will inform staffing and capacity strengthening requirements for the implementation of this proposed project. Such outcomes will also be used to design a long-term capacity building program, including but not limited to carrying out E&S assessment and management of E&S risks and impacts. The MOEFCC/DOE will also need to prepare operational guidelines (including E&S issues) to be followed during the implementation of the project.

Based on existing financial intermediary (FI) operations in the country, it is expected that the Bangladesh Bank will select eligible participating FIs (PFIs) to manage project financing to resource efficient and cleaner production (RECP) and pollution control investments. The Bangladesh Bank has worked with the World Bank on multiple operations, including the Investment Promotion and Financing Facility (IPFF) Project, the Financial Sector Support Project (P150938) and the IPFF Project II (which utilizes OP 4.03). The Bangladesh Bank has an established an ESMS system that has worked in sync with various WB operations. FIs, which will on-lend project funds to sub-borrowers to finance cleaner production and pollution control investments in brick and other polluting sectors, will be assessed for their E&S capacity as part of setting up FIs’ ESMSs. FIs and private sector beneficiaries will be included in the capacity building program to ensure they have adequate capacity to implement project activities according to Bank and domestic requirements. The capacity and training needs as well as institutional requirements, including various management plans and guidelines, will be documented in the Environmental and Social Commitment Plan (ESCP).

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The proposed project may support the following types of investment activities: (a) establishment of air and water monitoring networks and regional laboratories; (b) conversion of existing clay-fired brick kilns to the production of non-fired concrete blocks (or other alternatives); (c) installation and operations of air pollution control units; (d) construction and operations of effluent treatment plants (ETPs) and centralized ETPs (CETPs) at existing industrial areas; (e) construction and operations of waste storage, treatment and disposal facilities for the management of hazardous, electronic and plastics wastes; and (f) installation and operation of RECP technologies at targeted
industries. The existing status of air and water quality is expected to be improved and waste disposal recycling, reuse and management practices will also be enhanced. The treatment efficiency of the wastes will need to meet the standards of the Bangladesh Environmental Conservation Rules (ECR), 1997 and its subsequent amendments, the World Bank Group (WBG) Environmental Health and Safety (EHS) Guidelines and Good International Industry Practice (GIIP) or whichever has the more stringent standards. There will be no foreseen adverse effect of project activities on biodiversity and living natural resources since the project will work in the already polluted and stressed environment. The ecosystem services under the project areas are expected to be strengthened and restored in the long-run. Construction related sound and air pollution will be analyzed and mitigated. It is noteworthy that a similar Project (CASE) was successfully carried out in the Dhaka metropolitan area with the same implementation agency MOEFCC/DOE.

The project aims to promote and invest in the sustainability of the environment to improve ambient air and surface water quality and waste management practices at selected localities of Bangladesh. Without this proposed project, the current environmental condition is expected to be further degraded and severe air, water and waste pollution will continue damaging human health and ecosystems of Bangladesh. Based on the current project design, the project activities are not expected to lead to generation and releases of any additional pollutants; rather it provides the mechanisms to reduce the generation and releases of pollutants and thus bring down health hazard risks associated with such pollutants. That said, since the project itself will be handling and managing industrial and hazardous wastes, where the potential for environmental and human exposure could lead to adverse and irreversible environmental and human health and safety risks and where residual wastes after treatment still need specialized handling, transport and final disposal, environmental risk of the project is still rated “High”. The capacity of the implementing agency (IA) to manage industrial and hazardous wastes and the context under which the project will be implemented also contribute to the high environment risk rating of the project. This environmental risk rating will be revisited before appraisal as project locations and detailed design of components and activities are determined and will continue to be assessed and re-assessed during implementation.

Social Risk Rating

Substantial

The project would entail employment of labor for the construction of various types of infrastructure and facilities. The employed labor will mostly be from local areas, but some interventions may require the engagement of foreign companies/labor given their specialized nature (CETP, non-fired concrete blocks etc.). Hence labor management, labor influx and associated risk and impacts can be a point of concern. Construction activities beyond Dhaka City Corporations (for example Narayangonj) may entail interactions with local communities by the migrant labor forces which is one of the major sources of gender-based violence (GBV). Occupational Health and Safety (OHS) issues could be a concern as well. Community health and safety may be adversely affected by traffic congestion due to construction, waste/debris transportation to dump site, air and water pollution emanating from construction site and labor camps. Since the project will deal with both hazardous and nonhazardous wastes, there is a likelihood that the residual wastes remaining after project intervention may affect the health and safety of the community, including workers. There may also be a need for land acquisition and subsequent resettlement, physical and economic displacement— the extent of which can be determined based on a detailed social analysis to be performed during preparation. A Resettlement Policy Framework (followed by a Resettlement Action Plan) may thus be required to address identified resettlement issues. A few instances of small ethnic communities may reside in the project area and are likely to be affected by the project activities. The social assessment will depict if an independent/ standalone Indigenous People Plan (IPP) would be required or not. Given that project activities will be largely implemented at
existing industrial facilities, it is unlikely to affect any cultural heritage/ archeological site of significance; nonetheless, chance find procedures will be included in the environmental and social management framework (ESMF).

Given the nature and scale of the project, overall social risk and impact, capacity of the IAs and context under which the project will be implemented, the social risk rating is initially set at “Substantial”. This social risk rating will be revisited before appraisal as project locations and detailed design of components and activities are determined and will continue to be assessed and re-assessed during implementation.

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:

Project financed activities are expected to be overall positive from the E&S aspects. Nevertheless, considering project interventions described in the Risk section above, this standard is relevant to the project. The clients will carry out site specific Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Audits (Audits) once the project areas and activities are known to identify possible impacts, risks, legacy issues (if facilities are existing) and appropriate mitigation plans. An ESMF will also be prepared before project appraisal as detailed designs of some project activities and their locations may not be known before appraisal or at the beginning of the project when a participatory planning is carried out with the target communities and concerned stakeholders. ESMF will contain procedures, policies and practices to carryout E&S impact assessment and audit. Further, various guidelines and tools will be provided under ESMF to guide the preparation and implementation of assessments and mitigation plans (including audit for existing facilities) once activities and locations are determined. All E&S instruments will be cognizant of the assessment and management of the risks and impacts emanating from the residual waste.

An Environmental and Social Commitment Plan (ESCP) will be prepared to ensure that the relevant ESF instruments are prepared as part of project design and implemented throughout the project period to address and mitigate risks identified under relevant ESSs in a time bound fashion.

During the construction phase, it is expected that a significant number of workers will be employed by the contractors. The impact of the labor issues, including OHS, waste generation and communicable diseases, potential cases for GBV will be thoroughly assessed. A number of new technologies are envisaged to be used for air, water quality enhancement and waste management therefore resources (gas, power, water and raw material) requirement is likely to be high. It thus requires a resource efficiency protocol to ensure valuable resources are optimally used. Waste generation, including hazardous waste will also need to be assessed, monitored and managed as per WBG EHS Guidelines and GIIP. Communities, especially those living around project areas may be subject to traffic congestions, wastes generated from constructions and from operation of facilities, sound, water and air pollution as well as GBV. Hence there must be appropriate instruments— e.g. multiple channels of grievance redress mechanism (GRM), traffic management plan – planned upfront and included in the project design. During operation of the industries and establishment, a portion of hazardous and nonhazardous wastes will remain as residual that might contain heavy metal, toxic wastes, which need special handling, transport and final disposal.
Some land acquisition for infrastructure construction may be required and thus may cause physical displacement of houses, temporary economic displacement people and businesses. Even in lands classified as public (khas), poor households may be living and using such land for their livelihood. A Resettlement Policy Framework (RPF) (followed by a Resettlement Action Plan) will be developed for this project as and when needed.

There may be few small ethnic communities that might be adversely affected by project activities. However, no cultural heritage, archeological sites, biodiversity and living natural resources are expected to be negatively affected. To confirm the extent of such risks and impacts, site specific ESIA, ESMP, RAP, IPP will be prepared, as required, to meet the requirements of the new ESF and relevant E&S Standards, including but not limited to expanding the scope of the ESIA to assess the risks and impacts of relevant standards, the preparation of ESCP, Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP). The existing ESMS of the Bangladesh Bank will be assessed and further strengthened as necessary. The other FIs that on-lend project funds to industries will be screened to assess their ESMSs for adequacy; these will be strengthened (or new ones set up) as per the requirement of the ESF. etc.

Capacity of all IAs will be assessed and support will be provided to assist these IAs in their long-term development to carryout environmental conservation and management activities, including but not limited to strengthening screening and scoping to cover relevant parameters and standards not currently covered in the assessment; effective stakeholder engagement and consultation during the conduct of the EIA (including project implementation) and disclosure of information; need for analyses of alternatives in the national EIA system; adoption of other instruments other than IEE and EIA; and strengthening of monitoring and enforcement.

Areas where “Use of Borrower Framework” is being considered:
Not considered

ESS10 Stakeholder Engagement and Information Disclosure

In consultation with the World Bank, the lead IA – MOEF/DOE – will prepare and implement a Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and its associated risks and impacts. The SEP will identify stakeholders (affected parties and other interested parties) including land owners, tenants, entrepreneurs, business associations, civil society members, ethnic communities, government and civil servants, project beneficiaries etc. The IA will engage in meaningful consultations with all stakeholders throughout the project lifecycle paying attention to the inclusion of women and vulnerable and disadvantaged groups. The SEP will include a detailed schedule of planned activities for the various stakeholders during implementation of the project which will specify format and frequency of such engagements. A draft SEP will be prepared and disclosed as early as possible but prior to Appraisal. The IA will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. The Borrower will maintain and disclose documentation (evidence) of these consultations. It will also establish a Project GRM comprising a summary of the feedback/grievances received and a brief explanation of how the feedback was considered or the grievances were addressed. This GRM will also be used for GBV cases.
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

Amongst others, the project may include the construction of waste management facilities that may involve construction labors mostly from the Dhaka metropolitan area. However, as mentioned above, specialized construction activities may require the engagement of foreign firms and laborer. The project will involve both direct workers (consultants and staffs appointed from the implementing and concerned agencies at all levels) and contracted workers. There is a likelihood that the project may engage, on an ongoing basis, workers of primary suppliers of raw materials, construction materials and equipment. The presence of these primary suppliers will be determined upon the confirmation of construction design. For project activities beyond the Dhaka metropolitan area, the majority of the unskilled labors will be locally hired while the skilled workers may not be found beyond the Dhaka metropolitan areas. To ensure that local labor/communities are hired to the extent possible, clear contractual agreements will be provisioned by the IAs with the works contractors following the guidelines provided in Annex-3 of ESS-1 i.e. ‘Management of Contractors’.

An LMP will be developed and a standalone worker-specific GRM (for direct and contracted workers) will be established. The LMP will identify main labor requirements (how different categories of workers will be managed, in accordance with the requirements of national laws and ESS2) and risks associated with the project. The LMP will also determine the resources needed to address labor related issues. The ESMF/ESIAs (which will include E&S audit for existing facilities) for specific subproject/ installment/ facilities/ location will assess labor risks, including risks of child labor and forced labor. To ensure the health and safety of workers during the construction phases the IA will require the contractors to prepare and implement Occupational Health and Safety Plan (OHSP) following the WGB EHS Guidelines (for construction activities) and GIIP. The OHSP will also include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures, and continuous worker training/awareness. The risk of GBV is an issue that needs special attention. The Contractor will train and motivate the workers as per the Code of Conduct and any incidence of GBV will be reported and mitigated through the Project GRM channel.

ESS3 Resource Efficiency and Pollution Prevention and Management

This project will promote RECP technologies and implement pollution control investments in targeted sectors under Components 2 and 3. It will support: (a) conversion of existing clay-fired brick kilns to the production of non-fired concrete blocks (or other alternatives); (b) installation and operations of air pollution control units; (c) construction and operations of effluent treatment plants (ETPs) and centralized ETPs (CETPs) at existing industrial areas; (d) construction and operations of waste storage, treatment and disposal facilities for the management of hazardous, electronic and plastics wastes; and (e) installation and operation of RECP technologies at other targeted industries. Any end-pipe interventions will be preceded by RECP interventions to minimize the resource use and cost of final treatment. The ESIA and/or audit and the feasibility study will provide detailed analyses on these investments, their impacts on resource use and pollution management, including assessments of (a) the use of energy, water and raw materials for the operation of project supported facilities; (b) generation of liquid and solid wastes at various stages and recommended approaches for treating/disposing such waste in an environment friendly manner; (c) impacts on
air quality, generation of hazardous and non-hazardous wastes, greenhouse gas emissions in accordance with internationally or nationally accepted methodology for estimating greenhouse gas emissions. As such, the ESIA and/or audit of known subproject/facilities/location/installment will summarize findings of these reports and propose mitigation measures to address these issues in the ESMP and ESCP.

ESS4 Community Health and Safety
The Project activities may pose risks to the community health and safety. Construction activities may cause air, sound and water pollution and should be mitigated during construction of project financed works. The waste generated during construction activities will expose communities to health and safety risks especially those communities that are immediately close to the construction sites and along the transport routes for acquisition of goods and materials during the construction and operation phases. Further, the hazardous and nonhazardous wastes that will remain after mitigation (residual wastes) may also be a concern for the communities in general and workers in particular. Wastes generated during operation of project financed facilities will also need proper mitigation so as not to cause harm for the communities and workers. Disruption in movement might cause inconvenience to the local communities as access would be interrupted temporarily. Traffic management plans should be put in place to address these inconveniences. Similarly, labor employed during the construction phase, especially outskirt of the Dhaka metropolitan areas, may affect the local community and increase the risk of GBV. For all the construction work, the ESMP should include the obligation of the contractors to safeguard the community health and safety aspects along with OHS through training and signing of Code of Conduct. In addition, design of various facilities will also consider improving accessibility for people with disabilities. A Community Health and Safety Plan will be required from contractors, which will also include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and community awareness raising activities. A special focus will be given in the assessment and management of residual wastes, in line of its technical and financial feasibilities. The GBV risk rating of the project and subsequent measures to address GBV following the Good Practice Note will need to be developed and implemented with specific timelines. This will be included in the ESCP.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
The project may require land acquisition for some of its planned infrastructure. This might lead to the loss of land and loss or the disruption of income streams and livelihood activities for individuals or groups of people. However, the full extent of land acquisition, displacement of people and disruption of livelihoods will be known after a full scale social assessment through ESIA/ESMF. A subsequent preparation of a Resettlement Policy Framework/Action Plan (RPF/RAP) to cover all subprojects may be required. These will be reviewed, consulted upon, approved and settlement done prior the commencement of the associated civil works.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
The project is unlikely to negatively affect any biodiversity, their natural habitat, any living natural resources and ecosystem services. Overall, the living natural resources and their assemblage will be positively affected/benefitted if project components and interventions can efficiently be implemented and result to cleaner air and water quality. However, these will be confirmed during environmental assessment of the project area.
ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

There is presence of small ethnic communities in the Project areas as per the initial assessment whose presence and scale will be assessed during social assessment including the risk and impacts of the project activities on these communities. The principle of ESS7 will be implemented through development of a detailed IPP with the provision of free, prior and informed consent (FPIC) as appropriate and as required.

ESS8 Cultural Heritage

As it is expected that project sites will be located in well-developed industrial and municipal areas, the proposed project activities are expected to have no adverse impacts on archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural resources. However, an assessment will be done on all proposed project sites, once identified, to verify if such sites are located near to any heritage sites. A chance finds procedure will be included in the ESMP and chance find clause will be included in works contracts requiring contractors to stop construction if cultural heritage is encountered during construction and to notify and closely coordinate with relevant mandated country authority for the salvaging and restoration of such cultural heritage.

ESS9 Financial Intermediaries

The project may involve the Bangladesh Bank to select FIs to finance RECP and pollution control investments to targeted industries. PFIs (Including the Bangladesh Bank) will put in place and maintain an ESMS to identify, assess, manage, and monitor the environmental and social risks and impacts of FI subprojects on an ongoing basis. The ESMS will be commensurate with the nature and magnitude of environmental and social risks and impacts of FI subprojects, the types of financing, and the overall risk aggregated. Where the FI can demonstrate that it already has an ESMS in place, it has to be ensured that the FI has adequate documented evidence of such an ESMS, indicating which elements (if any) will be enhanced or modified to meet the requirements of WB ESS 9. The FI’s ESMS will include (i) environmental and social policy; (ii) clearly defined procedures for the identification, assessment and management of the environmental and social risks and impacts of subprojects; (iii) organizational capacity and competency; (iv) monitoring and review of environmental and social risks of subprojects and the portfolio; and (v) external communications mechanism. The subsequent ESIA/Audit/ESMF will study and analyse the FI’s ESMS and recommend if the FI’s ESMS can achieve results consistent with the objectives of relevant WB ESSs before disbursement of fund to that specific FI.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

The selected water bodies are expected to be local water bodies only.

OP 7.60 Projects in Disputed Areas

No

The project will not involve in any disputed areas.

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No
Financing Partners
No co-financing by other development partners is expected at this stage. This will be further confirmed during project preparation.

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

Actions to be completed prior to Bank Board Approval:
Preparation, consultation and disclosure of ESIA (for known location/ design)/ ESMF (for yet unknown locations/ designs of project components) and ESCP. ESIA will also include E&S audits for existing facilities.
• Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP)
• Preparation and disclosure of Labor Management Procedures (LMP)
• Preparation and disclosure of Resettlement Policy Framework/ Plan (RPF/RAP), Indigenous People Planning Framework/Plan (IPPF/IPP) as required
• Due diligence of existing ESMS of FIs, including Bangladesh Bank

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
Preparation, consultation and disclosure of ESIAs and ESMPs of each sub-project following procedure mentioned in ESMF
• Establishment of ESMSs for some FIs
• Implementation of Institutional Capacity Strengthening Plan for IA
• Implementation of Labor Management Procedures (LMP) by IA
• Implementation of Stakeholder Engagement Plan (SEP) by IA
• Implementation of Resettlement Policy Framework/ Action Plan (RPF/RAP) Indigenous People Planning Framework/Plan (IPPF/IPP) as required
• Implementation of gap addressing measures for associated facilities to make them materially consistent with the ESF.

C. Timing
Tentative target date for preparing the Appraisal Stage ESRS 09-Apr-2021

IV. CONTACT POINTS

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The World Bank
Bangladesh Environmental Sustainability and Transformation Project (P172817)

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Borrower/Client/Recipient
Borrower: People's Republic of Bangladesh

Implementing Agency(ies)
Implementing Agency: Ministry of Environment, Forest and Climate Change

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VI. APPROVAL
Task Team Leader(s): Aileen Bolus Castro, Jiang Ru, Suiko Yoshijima
Safeguards Advisor ESSA: Agi Kiss (SAESSA) Cleared on 14-Apr-2020 at 15:57:20 EDT