Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 04/20/2020 | Report No: ESRSA00741
### 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>
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<tbody>
<tr>
<td>Bangladesh</td>
<td>SOUTH ASIA</td>
<td>P169880</td>
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<table>
<thead>
<tr>
<th>Project Name</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
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<tbody>
<tr>
<td>Western Economic Corridor and Regional Enhancement Program</td>
<td>Investment Project Financing</td>
<td>4/15/2020</td>
<td>6/17/2020</td>
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<table>
<thead>
<tr>
<th>Borrower(s)</th>
<th>Implementing Agency(ies)</th>
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<tbody>
<tr>
<td>Ministry of Finance</td>
<td>Roads and Highways Department (RHD), Local Government Engineering Department (LGED)</td>
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#### Proposed Development Objective(s)

**To provide efficient, safe, and resilient connectivity along a section of a regional transport corridor in Western Bangladesh and reduce post-harvest losses in the hinterland of section.**

<table>
<thead>
<tr>
<th>Financing (in USD Million)</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Project Cost</td>
<td>745.40</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]

This Project (phase 1 of the MPA) will upgrade the Jashore-Jhenaidah national highway (48km) from a two-lane single carriageway to four lane dual carriageway. It will include separate service lanes for slow moving vehicles and vulnerable users on both sides of the carriageway, installation of OFC, and deployment of ITS. It will also finance the upgrading of priority Upazila, Union, and village roads and complementary logistics infrastructure at rural markets (commonly referred to as growth centers) in the four (4) Program Districts of Jashore, Jhenaidah, Magura, and Chuadanja. Lastly, it will finance the development of a Disaster (and Pandemic Response Plan for a leading road
agency in Bangladesh, the required trainings/capacity building activities, and preparatory studies/activities for subsequent MPA phases.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The proposed WeCARE Program is located in the Western Region of Bangladesh to upgrade the 260-km Bhomra - Satkhira - Navaron - Jashore - Jhenaidah - Bonpara - Hatikumrul Program corridor. The World Bank will support the upgrading of 110-km Bhomra-Satkhira-Navaron-Jashore-Jhenaidah road section through a Multi-Phased Approach (MPA) while AIIB will finance the upgrading of the remaining 150-km Jhenaidah-Bonpara-Hatikumrul road section. During the first phase, the World Bank MPA will support the improvement and widening of the 48-km Jashore – Jhenaidah Road section of the Program corridor. The first phase of the MPA will also support the upgrading and rehabilitation of feeder connectivity infrastructure (e.g., priority Upazila and Union roads that connect to trunk corridors); improvements to complementary logistics infrastructure (e.g., storage, processing, selling and distribution facilities); support to COVID-19 relief and recovery through contracting local labor to undertake labor-intensive road maintenance works to provide just-in-time livelihood support to poor people in the project areas and stimulate rural economy; and technical assistance to improve the capacity of implementing agencies, including capacity to plan and implement environmental and social standards. There is also a Contingency Emergency Response (CER) Component that will be activated in case of emergency.

The project area comprises floodplains of the Ganges River in the majority of the road and terraces. Topographically the cluster of the project location is almost flat, with many depressions and natural khals bounded by rivers namely Bhairab River, Chitra River, Begobati River. There are also significant numbers of beels, canals, ponds and ditches in and around the project locations. The Region is currently protected from flooding by protection banks and does not fall in cyclone risk zone. There are several numbers of small and big brick kiln and a few rice and sugar mills and frozen factory factories/industries.

The project area is located in open agricultural lands, homesteads, and roadside vegetation with open agriculture lands dominating the area. The horizontal alignment of the existing road corridor is generally open and free flowing, but in a few areas there are alignment constrictions due to the presence of urban areas and railway lines in close proximity to the road. In some sections, the present ROW is sufficient for the widening but in most locations, the acquisition of lands and physical displacement and relocation of structures will be necessary. The program is not located in any natural forests, protected areas, natural habitats and critical natural habitats. The Jashore-Jhenaidah Road passes through urban, semi-urban and agricultural areas. Both Jashore and Jhenaidah have ancient Hindu temple sites nearby and Jashore, in particular, has pre-colonial and colonial historical structures. There are mature trees lining along the ROW which will need to be cut, but this will be avoided to the extent possible. Some mosques, temples, graves and madrasahs are close to or within the ROW and will need to be partially or fully relocated, but this will also be avoided to the extent possible. There are legally owned houses and commercial structures as well as squatters along the ROW that will be affected due to widening of the road. At the time of the ESIA for Jashore-Jhenaidah road, no ethnic minorities/indigenous peoples were recorded in the program area.

Marjat Baor situated in the Kaliganj Upazila of Jhenaidah and Chaugacha Upazilla of Jashore, which is considered an environmentally-sensitive area, is more than 5-km away from RHD's Jashore-Jhenaidah Road but still within the area of influence of the LGED component that has broader spatial coverage than Jashore-Jhenaidah Road. Marjat Baor
(area 325 ha) is an oxbox lake that serves as an important habitat for many fishes and waterfowl. It supports livelihoods of many fishermen.

D. 2. Borrower’s Institutional Capacity

There are two implementing agencies under the program. During the first phase of the program, RHD will implement the improvement and widening of the 48-km Jashore – Jhenaidah Road, while LGED will implement the upgrading and rehabilitation of feeder connectivity infrastructure (e.g., priority Upazila and Union roads that connect to trunk corridors) and improvements to complementary logistics infrastructure (e.g., storage, processing, selling and distribution facilities). For COVID-19 relief and recovery, LGED will contract poor workers in the project areas to carry out labor-intensive maintenance works to provide livelihood support to the poor during covid-19 emergency. Both RHD and LGED will also develop their Emergency Plans for COVID-19 and upgrade their digital connectivity and work environments to ensure connectivity during COVID-19 emergency and future crises.

There is long experience in both RHD and LGED in implementing donor-funded projects, including those funded by the World Bank under the old Safeguards Policies. LGED is a long-time Bank client and is quite familiar with Bank safeguard policies and Bank processes. It currently implements the Second Rural Transport Improvement Project, an IPF, and the Rural Roads and Bridges Program, a Program for Results (PforR). LGED has a satisfactory track record of implementing safeguard policies in Bank-financed projects it implements. Its PIUs have Environmental Specialist and Social Development Specialist and under the Rural Roads and Bridges PforR Program Action Plan, LGED has established an Environmental and Social Unit effective July 2019 although it has yet to be fully staffed by qualified professionals. RHD on the other hand has not been implementing Bank-financed projects for years though it was a Bank client in the past and also has familiarity with Bank safeguard policies. However, RHD continues to implement ADB-funded projects and is familiar with ADB safeguard policies.

An E&S capacity assessment conducted by the World Bank during preparation of WeCARE indicated that while E&S performance of LGED in World Bank-funded projects is satisfactory, its capacity has not fully developed institutionally at the agency-wide level as donor-funded projects have relied mostly on ad hoc project arrangements through the use of project management units/project implementation units to implement donor-funded projects. Despite this, some institutional capacities have been observed in LGED. On one hand, while RHD has maintained a Social and Environment Circle (RSEC) within its organogram with full staff assignment, this unit is involved mainly in the review of the EIA for RHD projects but is not involved in implementation, monitoring and supervision. LGED on the other hand has evolved a fairly decentralized safeguards capacity which are more or less informal and is now slowly integrated into its newly established Environment and Gender Division (EGD). Needless to say, that both of these RSEC and EGD have very narrow range of functions and still have capacity challenges.

Thus, the capacity building plan has been designed not only to enable the program to meet World Bank ES Standards but also to develop institutionalized capacities for WB ESF in both agencies. It will address both system gaps and institutional capacities up to the level of the implementing agencies while addressing the immediate E&S management needs of the WeCARE program through the PIU/PMU. In essence, the capacity building program for WeCARE would consist of the following: (i) filling in the gaps in the system; (ii) institutional strengthening of existing ES management units of both agencies; (iii) recruitment of qualified staff; and, (iv) conduct of skills and awareness trainings. The staffing and capacity building needs are documented in the Environmental and Social Commitment Plan.
II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)  

Environmental Risk Rating  

Environmental risks and impacts mainly relate to physical works during construction, specifically felling of trees along the ROW; health and safety of workers and communities along the project area of influence and transport routes of construction supplies and materials; and siltation and sedimentation of waterways from road works. Negative impacts are anticipated mainly during construction largely within existing footprints for both Jashore-Jhenaidah road and priority feeder roads and complementary logistics infrastructure and can be managed through implementation of known and sound engineering measures and good construction site management. During operation it is expected that impacts will be mainly positive on the economy as well as on safety of communities with improved safety features of the widened, including the implementation of SMVT. Contracting poor people to carry out small works is also expected to provide relief and livelihood support and stimulate rural economy during COVID-19 emergency.

Environmental risks and impacts, while adverse and significant, are mainly construction-related and are largely temporary, predictable, reversible, localized and confined within the ROWs and physical locations of the activities. Any subproject that will adversely impact Marjot Baor will not be financed by LGED. In addition, LGED is quite familiar with Bank safeguard policies and both RHD and LGED have the environmental and social structures in their organograms though capacity strengthening actions can be designed and implemented. For these reasons, environment risk is rated Substantial.

Social Risk Rating  

In the first phase of the Program, there will be land acquisition related to the widening of the road and structures such as houses, mosques, temples, graves and madrasahs that will be partially or completely displaced, to the extent that they cannot be avoided. Affected people will lose their lands, houses and livelihoods, and some will need to resettle. It is anticipated that there will be a large number of squatters along the RoW who will also be affected. The adverse impacts on vulnerable PAPs (e.g. elderly, disabled and female-headed households) may be significant. In the 200 household (comprising of 838 individuals) sample survey conducted as part of the Jashore-Jhenaidah 2015 ESIA,
34 households have been found to be extremely poor (earning less than two USD per day). There are also a significant number (16 percent of surveyed population) of elderly (people over 60 years of age) people. Also, four percent of the surveyed population have long-term permanent disability. RHD will need to develop resettlement action plans for the linear RoW that will affect title holders, squatters and vulnerable groups. Due to extremely dense built-up areas and thriving economic activities along the RoW, the program will result in significant negative impacts. As the local businesses and markets will be affected due to project activities, there will be potentially many individuals and households that may become impoverished unless the impacts are properly assessed and mitigated. Many will lose their livelihoods and income sources and become unemployed. The relocation of religiously important structures such as temples, mosques and madrasahs will need to be handled with extra caution as these are sensitive structure that will have community-level impacts while relocated. On one hand, project support to labor-intensive small works is expected to provide income to poor people in the project areas affected by the COVID-19 emergency and to stimulate the local economy. Extensive community consultation will need to be conducted. It is important to note that the social survey and consultation for the ESIA were conducted along the RoW of the present two-lane highway and the 2015 design of the road. As soon as the alignment and design are finalized for the expansion of the road, the ESIA will need to be further updated. The components under the LGED will also create adverse impacts on individuals and households and limited impacts at the community level.

Considerable influx of labor is expected because of requirement of specialized skills and the lack of such skills locally. This is especially true for the RHD component (Jashore-Jhenaidah Road) that involves big contracts but less on the LGED Component. This will increase the risks to community health and safety, including risks of GBV. There is a potential that these affected people will be aggrieved against the project and laborers from outside the area without adequate consultation and communication and impact mitigation. Both LGED and RHD have prepared agency specific Stakeholder Engagement Plan and Labor Management Procedures. Due to low capacity (specifically of RHD), implementation of these plan and procedures may become challenging. Moreover, RHD contractors do not usually develop and implement code of conduct for its workers. All in all, the planned minimization and mitigation of the adverse impacts caused by the project will require resources and skills.

During the operation phase, the potential impacts will be mostly positive. However, the increased traffic and usage of roads may pose risks of increased incidents of accidents during the operation phase. Road safety awareness raising programs will be designed and implemented. While one implementing agency (LGED) has good capacity in managing social risks, the other implementing agency (RHD) lacks resources and capacity to manage such risks. Due to these reasons, the social risk is rated High.

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 standard is relevant to the project due largely to construction-related risks and impacts related to the widening of the 48-km Jashore - Jhenaidah road from 2-lane to 4-lane and the rehabilitation and construction of feeder roads and complementary logistics and market infrastructure in priority districts in the project area.
The Jashore-Jhenaidah road is existing and does not traverse any sensitive habitats, protected areas, natural habitats and will not impact on critically endangered, endangered or congregatory species. There are mature trees lining along the ROW that will need to be cut to the extent they cannot be avoided though they do not constitute or form a forest ecosystem. There will be land acquisition and partial or full physical displacement of structures such as houses, mosques, temples, graves and madrasahs, to the extent that they cannot be avoided.

Based on the ESIA conducted for Jashore-Jhenaidah road, the key environmental and social risks and impacts that are anticipated to occur largely during the construction phase and within existing footprints include: (i) cutting of about 3,300 trees lining along the expanded ROW; this will not impact, however, on any forests since these trees are just lining up along the ROW and are not connected to any forests; (ii) health & safety of workers and communities within the corridor and along the transport routes of construction supplies, materials and equipment, in project areas and around construction areas; (iii) exposure of population in urban and semi-urban centers along the ROW and transport routes to noise, vibrations, air pollution and traffic-related risks; (iv) siltation and sedimentation of waterways close to the physical works such as Bhairab River, Chitra River, Begobati River; (v) significant land acquisition along the expanded ROW, where it is estimated that a total 106.29 and 148 hectares of land will need to be acquired for Jhenaidah and Jashore, respectively; (vi) partial or full physical displacement of houses and some mosques, temples, madrasah and graves; (vii) temporary economic displacement of some vendors and businesses along the ROW and in market areas where some rural roads and logistics and market infrastructure will be constructed and/or rehabilitated; and, (viii) increased risk of GBV and road crashes. The program will mainly employ local labor for unskilled labor requirements, but skilled laborers may come from other areas of the country; thus risks deriving from labor influx are expected to be moderate to substantial. A GBV risk rating has been conducted and the risk has been rated as “substantial”. A GBV Action Plan with specific measures has been prepared following the Bank’s Good Practice Note. There are no indigenous peoples recorded during the ESIA in the Jashore and Jhenaidah districts.

The improvements of the 260-km corridor under the program is also preliminarily assessed to have no significant cumulative environmental and social impacts as works are mainly within existing roads and in an area/corridor that has already been altered, fragmented and highly disturbed for many decades as a result of human population growth, agricultural and aqua-culture development, encroachment and establishment of new settlements along the highway, land transformation and other associated development. With or without improvement works, land use change and land transformation have already taken place in the road corridor and will continue to take place as a result of other factors such as urbanization and development of the western province of the country. With no new capital investment in the road, the Jashore-Jhenaidah road would have to undergo the challenges of all future traffic flows, which are expected to increase given the envisaged future development in the area. This would create a significant environmental and social disturbance on the existing communities residing along the present alignment. There would be sharp increases in noise and vibration and air pollution. Not implementing the project will also have social implications. Road users, local communities and pedestrians would have to contend with an increased level of health and safety risks as crossing the road would become more hazardous and the roadside communities would be physically segregated between the different sides of the road. Traffic congestion would increase, and the economic cost of traffic jams is likely to impose a negative externality on the local economy. Overall the quality of the environment and social conditions would deteriorate along the road corridor in the no project scenario. With the project, road conditions will improve, health and safety will also improve with separation of Slow-Moving Vehicle Traffic (SMVT) from fast moving vehicles and the implementation of safety design features of the road, including
imposition of traffic speed limits and signages. There will also be reduction in travel time and trading of goods is expected to increase and be made more efficient.

The LGED component, on the other hand, will likely have moderate to substantial environmental and social risks and impacts given that most of the subprojects will be small to medium scale works mainly involving rehabilitation and improvements of existing infrastructure and labor-intensive small maintenance work targeting poor communities to provide income and social safety net during COVID-19 emergency. However, occupational and community health and safety during construction will need closer attention given Bangladesh’s overall weak performance and track record in managing these issues.

As mentioned, an ESIA for Jashore-Jhenaidah road was conducted and an ESMP was designed to manage the environmental and social risks and impacts of the first phase of the program following the mitigation hierarchy. The ESMP includes generic construction impacts as well as site-specific impacts on sensitive receptors, mitigation measures, monitoring, capacity building, responsibilities and reporting system and budget. In addition, the ESMP provides measures to address GBV issue at the project level. This ESIA/ESMP will be updated and finalized at detailed design stage of Jashore-Jhenaidah Road. A separate Resettlement Action Plan following the Resettlement Policy Framework will be prepared during the detailed design phase when the final alignment and detailed design are completed to address any land acquisition and physical and economic displacement related to involuntary land take. The ESMP obligates the contractor, prior to mobilization, to prepare the C-ESMP, which shall be approved prior to the commencement of construction activities. The Contractor’s ESMP shall include OHS Plan, Water and Waste Management Plan, Labor Influx Management Plan, Workers Camp Management Plan, Occupational and Community Health & Safety Plan, Traffic and Road Safety Management Plan, Borrow Area Management Plan, Construction Material Sourcing Plan and Site Restoration Plan among others in accordance with the GoB and WBs standards and guidelines. All such plans will be reviewed and approved by the PIU, RHD and the World Bank prior to commencement of construction works.

Other instruments prepared include Environmental and Social Management Framework (ESMF) for LGED, Labor Management Procedures, Stakeholder Engagement Plans, Resettlement Policy Frameworks and Environmental and Social Commitment Plans. LGED’s ESMF maybe updated within 90 days from CERC activation specifically if there are new activities not covered by the existing ESMF.

An Strategic Environmental and Social Assessment will also be carried out during the first phase of the program to inform the ESIA of future phases and to assess cumulative impacts of the program when combined with past, present and future development in the Western province.

ESS10 Stakeholder Engagement and Information Disclosure

In consultation with the Bank, both RHD and LGED have prepared and disclosed their respective inclusive Stakeholder Engagement Plans (SEPs) that are proportional to the nature and scale of the project and its associated risks and impacts. The ESIAs will identify stakeholders (affected parties and other interested parties) along the ROW and transport routes of the project, including land owners, tenants, farmers, fishers, business owners, vendors, hawkers, utilities, truck and bus drivers, private car owners, etc. along the corridor. RHD and LGED will engage in meaningful consultations with all stakeholders throughout the project life cycle paying attention to the inclusion of women and
vulnerable and disadvantaged groups. The SEPs include detailed schedule of planned activities for the various stakeholders during implementation of the project which specifies format and frequency of such engagements. The client 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 program GRM comprising a summary of the feedback/grievances received and a brief explanation of how the feedback was taken into account or the grievances were addressed.

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 proposed program specifically phase 1 will entail employment of Direct Workers working for the PIU, Contracted Workers mainly for civil works and labor-intensive contracts targeting the poor to provide income and livelihood support during COVID-19 emergency and Primary Supply Workers hired by primary suppliers to produce mainly construction materials for the project. It is expected that a significant number of contracted workers will be hired by contractors during construction. The majority of the contracted workers will be locally hired, with the exception of skilled workers who may not be found in the program areas. The Jashore – Jhenaidah Road is approximately 48 km with significant widening and labor camps are anticipated. For the rural roads and logistics and market infrastructure (LGED Component), labor requirements are expected to be medium in size mostly supplied by local labor. For the labor-intensive small contracts, the local poor will be targeted and engaged as contracted workers through the Labor Contracting Societies

To ensure project workers' labor and working conditions are in accordance with ESS2, clear contractual agreements will be provisioned by both RHD and LGED with relevant project workers. Labor Management Procedures (LMP) will be developed and a standalone worker-specific GRM (for direct and contracted workers) established. The LMP has identified 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 program and determined the resources necessary to address labor issues. The ESIA has assessed labor risks, including risks of child labor and forced labor. To ensure the health and safety of workers during the construction and operational phases of the program, both RHD and LGED will require contractors to prepare and implement their Occupational Health & Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities) and Industry Sector Guidelines for Construction Materials Extraction. LGED will also apply OHS measures in the LMP for labor-intensive contracts with local workers. 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.

ESS3 Resource Efficiency and Pollution Prevention and Management

With expansion of Jashore-Jhenaidah road during the phase 1 of the program from 2-lane to 4-lane, about 3,300 trees lining along the expanded ROW will be felled during construction to the extent that they cannot be avoided. Requirements for construction materials will be significant, especially filling materials to elevate the road to make it...
more climate resilient, as well as aggregates. Filling materials will be sourced largely from river dredging activities, which are quite abundant in Bangladesh. Dredging for sand materials will be subject to review, approval, monitoring and close supervision by PIUs/PMUs, CSC and the World Bank. Aggregates will be sourced mainly from India, as the usual practice in Bangladesh. Bitumen may also come from India. The project will require contractors to only purchase aggregates from legally-operating and licensed suppliers. A Construction Material Sourcing Plan will required from Contractors to be reviewed and approved by the PIUs/PMUs, CSC and the World Bank. During the construction phase, air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are people living within the proximity of the construction sites and along the corridor and transport routes. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration. Water requirements maybe significant but the project area has abundant water resources to meet the construction requirements without negatively affecting waterways and water sources. Construction activities will generate solid and liquid waste which will primarily include excavated soil and hazardous waste such as hydrocarbon oils from construction machinery and vehicles. The waste generated by the construction works will largely be disposed of at approved sites according with national laws and regulations and in accordance with the WBG EHS Guidelines.

Greenhouse gas emissions for Jashore-Jhenaidah road was calculated and results indicated that gross GHG emission for over 20 years is about 3,017,893 tons.

ESS4 Community Health and Safety

Construction activities increase traffic and influx of labor in the project area, which expose communities to health and safety risks especially those communities that are immediately close to the construction activities and along and within the corridor and transport routes. Expansion of the corridor and road works and works related to logistics infrastructure expose communities to health and safety risks from increased traffic during construction along the corridor and transport routes. Access will also be affected. This disruption in movement would cause inconvenience to the local communities as access would be interrupted temporarily. Traffic management plans will be put in place to address these inconveniences. For all the construction work, the ESMP will require contractors to install a safety system around the project sites (fences and safety guards) during the entire construction period. When works take place on open roads, equipment and vehicles will be brought together to one single well-secured area during the night to ensure both community and worker’s safety. In addition, the road design will also consider improving accessibility for people with disabilities. A Community Health & Safety Plan will be required from contractors as part of the C-ESMP, 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.

During operation, road safety and community health and safety are anticipated to significantly improve with the installation of safety features on widened roads, including separation of slow moving from fast moving vehicles, enforcement of speed limits and installation of signages.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
The project will finance the widening of the 48-km Jashore-Jhenaidah Road by RHD and construction of feeder roads and market infrastructure by LGED. These activities would involve land acquisition that would lead to the loss of land and loss or disruption of income streams and livelihood activities for individuals and/or groups of people. As the LGED sub-projects have not been decided and identified yet, the exact amount of land required is not known yet. Therefore, the ESMF (LGED) includes a sub-project specific social risk assessment that will determine the amount of land, if needed. For RHD, there is a design of the road that has been done in 2015, which will be updated and finalized under this project after Board approval of the project. Resettlement Policy Frameworks (RPF) have been prepared by both RHD and LGED and these will be disclosed before appraisal. Subsequent Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs) will be developed during the detailed design and project implementation phase, as appropriate. According to EIA conducted in 2015 following the then design of the expansion of the road for the Jashore-Jhenaidah road, 106.29 and 148 hectares of land will need to be acquired from Jhenaidah and Jashore, respectively. Such land acquisition will cause both physical and economic displacements. As soon as the design for the road is finalized, the exact amount of land requirement will be known and RAPs will be prepared following the RPF that has been prepared for the project. The RAPs will be reviewed, approved and disclosed both within the country and on the World Bank's web site prior to the issuance of bids and implementation will be completed prior to the taking of land.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project will affect about 3,300 trees that have to be cut to give way for the expanded ROW. These trees are dotting the roadside in largely agriculture landscape and built-up areas and are not connected to any forests. The road design will try to avoid and/or minimize the cutting of the mature trees, to the extent possible. For trees that will be cut, RHD will implement a compensatory reforestation program to meet GoB requirement through RHD’s Social Reforestation program.

The ESIA for Jashore-Jhenaidah road did not identify any environmentally-sensitive areas within the ROW and direct and indirect impact area of the project nor any critically endangered, endangered and congregatory species. Marjot Baor, an environmentally-sensitive habitat, is more than 5 km away from Jashore-Jhenaidah Road and will not be directly impacted by the road works. The road corridor traverses agricultural, urban and semi-urban areas. There are, however, natural waterways that might be affected during construction. The ESMP includes measures to manage impacts on these waterways.

Marjot Baor, one one hand, maybe located within the influence area of the LGED component that covers a broader area beyond the Jashore-Jhenaidah corridor. Any subprojects under the LGED component screened to have adverse impacts on Marjot Baor will be ineligible for project financing.

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

The ESIA for Jashore-Jhenaidah indicated the absence of indigenous peoples in the project area, so ESS7 is not currently Relevant to the project. However, the presence or absence of indigenous peoples for the road corridors will be screened and confirmed during the finalization of the ESIA at the detailed design phase of the Jashore-Jhenaidah Road and during the ESIA of each subproject for the LGED Component. If any of such groups are identified the
principles and requirements of ESS7 will be implemented through the development of a detailed IPP with the provision of free, prior and informed consent, as appropriate.

ESS8 Cultural Heritage

There are some mosques, temples and graves along the ROW, which may be affected by project works. They will have to be relocated and will be included in the RAP prepared for the program. Chance Find Procedures will be included in the ESMP and chance find clause will be included in works contracts requiring contractors to stop construction, if cultural heritage are encountered during construction. The Borrower will also have to notify and closely coordinate with the relevant mandated country authority for the salvaging and restoration of such cultural heritage.

ESS9 Financial Intermediaries

The first phase of the proposed program will not involve financial intermediary.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

OP 7.60 Projects in Disputed Areas

No

No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED</th>
<th>TIMELINE</th>
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<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
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<tr>
<td>ESIA/ESMP for Jashore - Jhenaidah Road based on feasibility study</td>
<td>03/2020</td>
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<td>Environmental and social management framework of LGED</td>
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<td>Environmental and Social Commitment Plan.</td>
<td>03/2020</td>
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<td>Final ESIA/ESMP for Jashore-Jhenaidah road based on detailed design and final road alignment</td>
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<td>Strategic Environmental and Social Assessment to inform the ESIA of future phases and to assess cumulative impacts of the program when combined with past, present and future development in the Western province.</td>
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</tr>
<tr>
<td>Apply ESF to AIIB-financed activities during preparation and throughout implementation. Bank will conduct due diligence of AIIB instruments, GoB will supervise and monitor E&amp;S risks and impacts of the whole Program corridor in accordance with the E&amp;S instruments and will ensure all supervision</td>
<td>03/2021</td>
</tr>
</tbody>
</table>
records and project sites are accessible to both WB and AIIB. WB and AIIB may also conduct joint supervision missions and one GRM will be adopted for the Program.

**ESS 10 Stakeholder Engagement and Information Disclosure**

- Prepare and disclose SEPs for RHD and LGED
  - 03/2020
- Set up Grievance Redress Mechanism for project
  - 10/2020

**ESS 2 Labor and Working Conditions**

- Labor Management Procedures for RHD and LGED
  - 03/2020
- Contractors' OHS Plan
  - 03/2021
- Workers' Grievance Redress
  - 10/2020

**ESS 3 Resource Efficiency and Pollution Prevention and Management**

- C-ESMP for contractors, including Construction Materials Sourcing Plan
  - 03/2021

**ESS 4 Community Health and Safety**

- Contractor's Health and Safety Plan
  - 03/2021
- GBV Action Plan
  - 11/2020

**ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

- Resettlement Policy Frameworks for RHD and LGED
  - 03/2020
- Resettlement Action Plan for Jashore-Jhenaidah Road
  - 12/2020
- Resettlement Action Plans for LGED Component
  - 06/2021

**ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

- Screened and assessed biodiversity and living natural resources and measures to protect and manage biodiversity included in the ESMP for Jashore-Jhenaidah Road.
  - 03/2020

**ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

- Screening of Jashore-Jhenaidah road for IPs.
  - 01/2020
- Screening of LGED subprojects (feeder roads, logistics and market infrastructures) for IPs completed.
  - 12/2020

**ESS 8 Cultural Heritage**

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**Public Disclosure**
Assessment of CH included in the ESIA
Chance Find Procedures included in the ESIA

ESS 9 Financial Intermediaries
Not relevant

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:
The use of Borrower's Framework is not considered for this project although the project will meet both the requirements of the GoB and the relevant World Bank ESSs.

IV. CONTACT POINTS

World Bank
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Borrower/Client/Recipient
Borrower: Ministry of Finance

Implementing Agency(ies)
Implementing Agency: Roads and Highways Department (RHD)
Implementing Agency: Local Government Engineering Department (LGED)

V. FOR MORE INFORMATION CONTACT
## VI. APPROVAL

| Task Team Leader(s):           | Muneeza Mehmood Alam, Jan Erik Nora, Rajesh Rohatgi |
| Practice Manager (ENR/Social)  | David Seth Warren Cleared on 20-Apr-2020 at 17:18:46 EDT |
| Safeguards Advisor ESSA        | Agi Kiss (SAESSA) Concurred on 20-Apr-2020 at 17:35:50 EDT |