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	P175810	
Project Name	Dhaka Rivers Ecological Restoration Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Water	Investment Project Financing	5/2/2022	9/12/2022
Borrower(s)	Implementing Agency(ies)		
People's Republic of Bangladesh	Ministry of Water Resources, Ministry of Local Government, Rural Development, and Co-operatives		

Proposed Development Objective

The PDOs are to (a) improve water flows and navigability of the rivers and canals around Dhaka City; and (b) enhance domestic wastewater management around Dhaka City, by supporting the implementation of selected priorities under the Dhaka Rivers Master Plan and the Dhaka Sewerage Master Plan.

Financing (in USD Million)	Amount
Total Project Cost	**636.00**

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]

To achieve its development objectives, the Project will be supported through Investment Project Financing (IPF) on IDA terms, investing US$635 million across five components. The components are in line with the Government's Preliminary Development Project Proforma (PDPP), which includes priority multisectoral investments under the DRMP and DSMP that are foundational in nature. The project components are:

(a) Component 1: River and canal rehabilitation (US$250 million). To restore the natural drainage function of rivers and canals and reestablish water flow, this component will support demarcation of their boundaries; dredging, re-excavation, and cleanup; and land reclamation. The specific location of this component will be selected based on the severity of flow reduction, flooding, or waterlogging and IA readiness to implement. Once water flow is reestablished and rivers and canals are reconnected, they will help enhance water quality and river navigation, thereby complementing Components 2 and 3.
(b) Component 2: Wastewater collection and treatment (US$330 million). To improve the water quality of rivers and canals, this component will invest in domestic STPs, sewer networks, and other on-site sanitation facilities in informal residential areas, closely coordinating with the Dhaka Sanitation Improvement Project (DSIP, P161432) that invests mainly in the Pagla sanitation catchment area. To deal with industrial effluents, concurrent investments in ETPs will be made through the Bangladesh Environmental Sustainability and Transformation (BEST) Project (P172817).
(c) Component 3: Navigation improvement (US$45 million). This component will build on the previous projects carried out by the BWDB and BIWTA to further enhance the navigability of rivers and canals. Investments will be made on capital and maintenance dredging and dredge spoil management. One main outcome is to showcase a pilot for hazardous waste and plastic management.
(d) Component 4: Institutional strengthening and project management (US$10 million). This component will finance the following activities that are aimed at strengthening institutions relevant to the DRMP implementation: (i) development of a decision support system that would enhance institutions' capacity to regulate and monitor the rivers and canals and facilitate O&M of river infrastructures; (ii) capacity building on PPP structuring on wastewater treatment and dredge spoil management; and (iii) training on soft skills, such as change management and collaborative communication. Project management support will be provided through this component as well, such as preparation of bid documents and stakeholder consultation.
(e) Component 5: Contingent emergency response component (CERC) (US$0 million). A provisional zero amount component is included, which will allow for rapid reallocation of credit proceeds from other project components during an emergency.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project area is located within the greater Dhaka region. The project will cover five major rivers, Buriganga, Turag, Balu, Shitalakkhya and Tongi khal and their tributaries in and around Dhaka and play a critical role in supporting the city.

All the rivers under the project are part of the government declared "Ecologically Critical Area (ECA)" where the ecosystem is considered to be endangered and reached a critical condition by the changes brought through various human activities. These rivers and its tributaries pass through densely populated urban and peri-urban regions with agricultural areas further upstream. The land-based activities of the project including construction of sewer treatment plants (STPs) and other onsite sanitation facilities will be implemented in agricultural landscape or populated built-up areas.

The current sewerage network covers 20% of the population, is undersized, and largely dysfunctional. The city has one STP that is underutilized due to damaged collection and transmission networks. Most of Dhaka's sewage, around 1,250 million l/day, ends up in its rivers. About 3.5 million people living in Dhaka's low-income communities,

especially women, children, elderly and sick, are the most vulnerable to the impacts of poor sanitation and high levels of pollution. A study on Buriganga river to assess the impacts of relocation of tannery industries shows, although the water quality improved (measured by BOD, COD, EC etc, in samples before and after relocation), the DO levels did not improve significantly due to waste loads from municipal sewage, industrial pollution & other sources. Chemical pollution in the rivers has caused freshwater ecosystem degradation and decline in biodiversity such as river dolphin populations.

Amongst the national regulations the Dredged Material Management Policy 2013 gives guidelines for the management and disposal of dredged material. The Policy states dredged materials can only be disposed at specified locations for developing lands, urbanization, constructing dams and roads. The Environment Conservation Rules (ECR) 1997 specifies standards for sewage discharge.

Dhaka is the capital and largest city in Bangladesh and is very densely populated. A large part of the population live in slums in informal settlements and belong to low-income groups. Component 1 comprising of river and canal rehabilitation is anticipated to impact on informal settlers and in some cases, leading to displacement, potentially involving both economic and physical, of these people. Component 2 will involve setting up of STPs and other onsite sanitation facilities. This may also involve “public-private partnership” (PPP). Whether implemented through PPP or directly by the IAs, efforts will be made to construct such STPs on government-owned land. If such land is not available, the next step will rely on negotiated purchase, in particular under the PPP modalities. If negotiations do not work, this may subsequently involve land acquisition under eminent domain principle.

The dredging activities under Components 1 and 3 may pose significant environmental and social hazards particularly as regard to disposal of the dredge materials. The project’s capital and maintenance dredging investments for navigational channel improvement of component 3 are also expected to replace a number of existing bridges with increased heights for passage of river vessels. The reconstruction of these bridges and widening of access roads will likely involve displacement of informal settlers.

The project anticipates low to moderate labor influx. The project’s initial SEA/SH screening based on the Bank’s GPN on Major Civil Constructions rates SEA/SH risk as ‘moderate’. With its high E&S risks and impacts, the is strongly also likely to attract the focus of civil society and NGO/CSO organizations from Bangladesh and potentially, even from abroad.

D. 2. Borrower’s Institutional Capacity

The project potentially may involve as many as 6 different implementing agencies under 2 different ministries: 1) Bangladesh Water Development Board (BWDB) under the Ministry of Water Resources (MoWR); 2) Dhaka Water and Sewerage Authority (DWASA); 3) Dhaka North City Corporation; 4) Dhaka South City Corporation; 5) Narayanganj City Corporation and 6) Gazipur City Corporation- all under the Ministry of Local Government, Rural Development & Cooperatives. Other agencies, such as the Bangladesh Inland Water Transport Authority (BIWTA) under Ministry of Water Resources, and Department of Environment (DoE) under Ministry of Environment, Forests and Climate Change are also expected to be engaged and play important role in the implementation of the project. However, the two main implementing agencies of the project are: BWDB and DWASA, along with the 4 city corporations of Dhaka North, Dhaka South, Narayanganj and Gazipur.

BWDB, DWASA, BIWTA, DOE and also Dhaka North and Dhaka South City Corporations are currently implementing Bank funded projects under the old OP/BPs and all are expected to be involved in the implementation of ESF project(s) soon as well. WB projects of BWDB include Coastal Embankment Improvement Project - Phase I (CEIP-I) (P128276) with moderately satisfactory compliance on safeguard management and Bangladesh Weather And Climate Services Regional Project (P150220) with satisfactory compliance on safeguard management. The safeguard rating for DWASA implemented Dhaka Sanitation Improvement Project (P161432) is satisfactory. BIWTA is the implementing agency of the investment project, Bangladesh Regional Waterway Transport Project 1 (P154511) with satisfactory compliance on safeguard management. DOE, Dhaka North and Dhaka South City Corporations completed Clean Air & Sustainable Environment (CASE) project with satisfactory compliance on safeguard management. The Dhaka Urban Upgrading Project (P165477) of Dhaka North and Dhaka South City Corporations has satisfactory compliance on safeguard management. However, for Narayanganj and Gazipur City Corporations, it will be their first Bank-funded project. In all cases, it's anticipated that all the IAs including BIWTA and DOE will require substantial support on E&S capacity building as per the Bank's requirements under the ESF.

A borrower capacity assessment of the implementing agencies will be carried out during the preparation of the project. The assessment will analyze the E&S risk management capacity of the IAs involved in the project's implementation including the concerns of inter-IAs institutional coordination on E&S risk management. The findings of this assessment will inform the required E&S staffing and institutional strengthening for this proposed project and will be used to develop a long-term E&S capacity building program for the IAs which will be included in their respective Environmental and Social Commitment Plan (ESCP).

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

A. Environmental and Social Risk Classification (ESRC) — High

Environmental Risk Rating — High

The project environmental risks and impacts are related to the implementation of investments under components 1,2 and 3. These include: i)component 1: dredging and clean-up to reestablish water flows & rehabilitate rivers and canals; ii)component 2: construction of STPs & other onsite sanitation facilities to improve water quality of rivers and canals; iii)component 3: dredging and dredge spoil management to further enhance the navigability of rivers and canals. The rivers, canals and surrounding lands that would be within the project footprint are part of the urban landscape and many areas are environmentally degraded. The project will have positive environmental and social benefits in terms of ecological restoration, improving water quality and transport capacity of the rivers and canals around Dhaka City. The main adverse environmental risks and impacts are expected to stem from the water and environmental pollution from management of contaminated sludge in riverbeds and aquatic ecosystems; and the transportation & disposal of substantial amount of dredged spoil. As per national regulations, disposal sites for dredging material spoil will not be selected in or near critical habitats. Impacts also include waterway traffic disturbances and risks from accidents; water quality affecting aquatic species and water supply along the rivers and community & worker health and safety from the vehicles and equipment that handle and transport dredged materials from the project sites. The replacement of bridges with new structures will impact aquatic and land environment as well as cause traffic congestion and safety issues. The environmental risks and impacts related to construction of STPs and other onsite sanitation facilities include potential environmental impacts on air quality,

noise generation, loss of trees and vegetation, soil and ground water contamination, generation of construction solid waste and wastewater and ecological impacts on major water sources. During the operation phase of these facilities there may be risks from polluting materials such as chlorine and discharge of sludge and effluents into the nearby water bodies. There are also significant occupational and community health and safety risks including dust and noise generation, road safety associated with the construction activities.. River management in Bangladesh has been under a fragmented, weak institutional framework for a long time. Shortcomings are found throughout the water infrastructure investment cycle, which includes master planning, preparation, implementation and O&M. While there are limitations in the existing capacity of the IAs to manage environmental risks, such limitations are expected to be addressed through capacity building activities of component 4. Given the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential environmental and risks and impacts; and the capacity and commitment of the Borrower, the environmental risk of the project is rated "High" considering: (i) potential risks and impacts related to the dredging activities & management of contaminated dredging spoil, (ii) labor and OHS related challenges during dredging & construction activities, and (iii) capacity of the implementing agencies in assessing and managing ES risks. This risk classification will be reviewed on a regular basis and changed, if necessary. Any change in classification will be disclosed on the Bank's website.

Social Risk Rating High

The project is likely to involve land acquisition for the proposed STPs and water treatment plants in case government owned land is not available. In addition, the rehabilitation of the canals and riverbanks will potentially involve displacement of informal settlers and require business and livelihood restoration including potential rehabilitation of significant number of informal settlers. Such informal occupants are also likely to be found in the case of acquired land given the population density in the metropolitan Dhaka. The project also will replace a number of existing road and rail bridges to raise heights to allow passage of river vessels for transportations of goods and cargo. The reconstruction of these bridges is also likely to involve displacement of informal settlers and as well as land acquisition for widening of the access roads. In all cases, the displacement and subsequent livelihood and business restoration of significant number of these informal settlers are bound to pose serious challenges including, potentially, risks of litigations. Further, there are news reports in the recent months of forced eviction by the government to clear off river and canal banks, areas which are likely to be under the project's footprints. The Bank will not finance investments in the areas where such forced evictions have taken place. Nevertheless, this issue of forced evictions will require further discussion with the government/client and as well as continued attention of the Bank's senior management with the client and be discussed in the PCN review meeting. The issue is is also likely to draw the attention of and/or involve a broad group of stakeholders keeping vigilance on the Bank's role in the project's involuntary resettlement and business and livelihood rehabilitation process, potentially exposing the Bank to serious reputational risks. The two Dhaka city corporations and BIWTA as well are currently preparing projects on riverbank and canal rehabilitations, and maintenance dredging from the government's own funding. However, these are not considered as associated facilities to the project in reference to paragraph 11 and the consequent footnote 12 under ESS 1 of the Bank's ESF. While these projects may be a) directly and significantly related to the project; and (b) carried out, or planned to be carried out, contemporaneously with the project; the third criteria "(c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist", does not seem to be applicable in this case, in particular that the government would have been going ahead with the planned projects even without the proposed Bank-funded project. As per information available as of now, there are no indigenous communities in the project catchment areas. The labor influx is anticipated to be low to moderate whereas the initial SEA/SH screening gives a moderate risk. However, with the risks related to displacement and rehabilitation of the squatters or informal occupants, challenges to potential land acquisition and

negotiated land purchase, and potential risks to Bank's reputation from effectively engaging with a broad group of stakeholders in the background of weak E&S risk management capacity of the IAs and inter-agency coordination among them, justifies HIGH social risk of the project.

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:

Overall, the project will have positive environmental & social benefits in terms of restoring ecological functions of the rivers which will improve water quality and transport capacity of the rivers and canals around Dhaka City. Dredging and general cleanup will significantly improve water quality, and habitat quality, benefitting aquatic species & human health, especially of the communities living on the banks. The construction of STPs and other sanitation facilities will reduce the pollution load to the city's waterways. Similarly, the improved navigational condition will provide opportunities for improving business conditions and movement of cargo and passenger traffic, leading to better livelihood opportunities. ESS1 is relevant to the project and focuses primarily on establishing capacity and responsibilities for ensuring that requirements stated under ESS10 , ESS6, ESS5, ESS4, ESS3 and ESS2 are implemented.

The main E&S risks and impacts are expected to stem from: (a) water and environmental pollution, disturbance of aquatic ecosystems, and community/workforce health and safety with respect to dredging, storage, transportation, and disposal of contaminated dredged materials; (b) land acquisition and the consequent potential displacement of squatters/informal occupants; (c) exposure to COVID-19 and other infectious diseases by the workers and nearby populations; (d) exposure of population and workforce to noise, dust, vibrations, air pollution, traffic congestion, road construction spoils, and other road safety-related risks; (e) polluting materials and discharge of sludge and effluents into the nearby water bodies during the operation phase of STPs; and (f) stakeholder engagement, failure of which could potentially put the World Bank's reputation at stake.

The project anticipates land acquisition for construction of STPs and replacing the existing bridges to increase the heights to allow passage of river vessels. The riverbanks and canal rehabilitation related civil works do not expect land acquisition but in all cases, the activities are highly likely to involve displacement of existing informal occupants, many of whom run business or other activities for their livelihood. Almost all these informal settler population belong to the lowest tier socio-economically, with the women headed households and other disadvantaged groups such as physically disabled or transgender population among the poorest and most marginalized.

Recent news reports show forced eviction by the IAs to clear river and canal banks areas which are likely to be under the project's footprints. This could also potentially indicate legacy issues related to displacements and land acquisition. The Bank has decided not to invest in the areas where such forced evictions have taken place in the recent time but in all cases, this issue will require further discussion with the client. It'll also need continued attention of the Bank's senior management and be discussed during in the PCN review meeting for further guidance to the Task Team.

Currently, DSCC is working on the preparation of two canal stabilization projects with direct govt funding. It is also highly likely that the other IAs have similar or comparable projects. However, these are not considered as associated facilities to this project which is clarified above in the section "social risk rating" under ESRC. However, as mentioned above, in case if forced evictions have already taken place or land acquisition or resettlement implementation has already been initiated under any of these associated facilities, an independent E&S audit/assessment may be required on those particular projects so that potential gaps can be assessed and there is clarity on the magnitude of the gap and potential cost for remediation and correction in compliance with ESS5.

The preliminary data collected for the project so far indicate that there are no indigenous peoples in the project catchment areas. It is also anticipated that the labor influx will be low to moderate as all the project sites are located in urban areas. The Labor Management Procedures (LMPs), prepared for the project will set out the procedures for management of labor influx including for different types of labor employed under the project. This is further detailed under ESS 2.

The precise sites and project locations will be known during the project preparation and based on that the Borrower will prepare an Environmental and Social Impact Assessment (ESIA) including an Environmental and Social Management Plan (ESMP) and a Cumulative Impact Assessment (CIA) in accordance with the Bank's ESF and national environmental and social assessment regulations. The ESIA will include assessment of the risks and impacts of relevant E&S standards: It'll also describe institutional framework, the project and baseline conditions, identify and assess the potential environmental and social risks and impacts including direct and indirect impacts during dredging and cleanup of rivers and canals; and pre-construction, construction, and operation. The ESIA will identify opportunities to preserve, improve existing ecologically critical areas and facilitate a more holistic approach towards dredging and cleanup of river and canals and construction and operation of STPs and other onsite sanitation facilities. The ESIA will also assess the adequacy of current infrastructure design standards applicable to the proposed investments, considering the impacts of climate change and foreseeable changes of urban landscape. Public consultation and disclosure of information during the ESIA process will be in line with the relevant ESSs. The ESMP will consist of a set of mitigation, monitoring and institutional measures with budget to be carried out during project implementation & operation to avoid adverse E&S risks and impacts, and to offset them or reduce them to acceptable levels.

The CIA will determine the cumulative impacts of this proposed project and other contemporaneous initiatives that may have impact on these river systems such as Dhaka River Master Plan (DRMP), Dhaka Sewerage Master Plan (DSMP), Bangladesh Regional Waterway Transport Project, Augmentation of Buriganga Flow, Bangladesh Environmnetal Susteainability and Transformation Project and Jamuna River Economic Corridor Development. During the project preparation stage, Bank will closely follow up with the PMU regarding national clearances and permits related to environment and social issues. The ESIA will also include a negative list of ineligible activities under the Contingency Emergency Response Component (CERC) in the event the CERC is activated.

The ESIA will assess ESF implementation capacity needs of the Borrower's and implementing agencies to manage the project's environmental and social risks and impacts. The assessment will be carried out as a standalone report but will be attached as annex to the ESIA, and will include analysis of institutional arrangements and systems of the borrower, assessment of capacity of the individual IAs on E&S risk management such as, existing rules, policies, systems and staffing; Inter-agency coordination mechanisms among the IAs for ESF compliance. Based on these

analyses, relevant recommendations will be made to strengthen the E&S management and monitoring capacity of the IAs and which will be incorporated in the Borrower's Capacity Development Plan for the project. Component 4 of the project includes specific interventions and budget for this purpose.

The salient features of the ESIA and other ESF documents will be included in the ESCP.

Areas where "Use of Borrower Framework" is being considered:

The project will be jointly funded with Asian Infrastructure Investment Bank (AIIB). However, it's decided that the Bank's ESF will be adopted for the project by both institutions.

ESS10 Stakeholder Engagement and Information Disclosure

The project stakeholders potentially will include a broad range of groups and individuals from diverse backgrounds, as follows: riverbank and canal banks neighborhoods and communities; neighborhood-based traders and business association; transports associations including river-based transports actors; business and trade bodies and metropolitan Dhaka and national level, media, civil society and NGOs, think tanks, academic and research organizations, etc. The project will engage all the relevant stakeholders from the early stage of preparation and all through the implementation. The stakeholders also will include vulnerable and disadvantaged groups identified in the preparation of the ESIA and through Bank's due diligence and they will be engaged to understand their concerns and needs to accommodate in the project design and as well as implementation.

The client will prepare a Stakeholders Engagement Plan (SEP) covering all the IAs proportional to the nature and scale of the project which will also take into account the overall risks and impacts. The engagement process with the stakeholders will start from the early stage of the project's preparation with the SEP providing the detailed modalities and approaches for engagement with the stakeholders in line with their relevance to the project. The SEP will include a detailed plan of activities to engage the stakeholders along with a Grievance Mechanism (GM) to receive and address any/all potential cases of grievances from the stakeholders as well as to receive any relevant feedback/comments from them. Thus, continued and sustained engagement with all the relevant stakeholders all through the project cycle will be key to taking into account the potential high reputational risks of the project for the Bank. The SEP will also detail the program's communication strategy and closing the loop of the stakeholders' feedback and, finally, the SEP will be disclosed as early as possible but prior to appraisal.

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 involve direct workers (IA employees transferred to the PIU, specialists engaged from the market, etc.); contracted workers engaged in construction work on for third party contractors and primary supply workers (to provide aggregate material). The project anticipates low to moderate labor influx given that all the project sites are located in urban settings and it's unlikely that workers' camp will be required on the project sites.

The borrower/IAs will prepare Labor Management Procedures (LMP) that will detail the employment modalities for labor management ensuring that all employed labor will receive clear contractual agreement with detailed wage/remuneration rate and payment schedules/timeline. 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, and as well as provisions against child and forced labor. The LMP will also determine the resources needed to address labor related issues. To ensure the health and safety of workers during the dredging and construction, the IAs 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. OHS measures applying to the Project will be set out in the bidding documents and the ESCP. Finally, the LMP will include provisions/procedures for a labor-specific standalone GM where all project workers will be able to raise their work-related grievances.

The OHSP will include measures to address protection from COVID19 as per WHO guidelines and relevant national legislation. In coordination with measures required under ESS4, an emergency prevention and preparedness plan will be prepared; the plan will outline its response strategic and organizational arrangements that will be in place well managing emergency situations, including pandemics. Trainings on the SOPs and other related procedures will be provided to all categories of project workers. Signage will be posted in all public spaces mandating hand hygiene and PPE use. The IAs will also ensure availability of adequate supplies of PPE (particularly facemasks, gloves, hand-washing soap and sanitizer) at its premises.

ESS3 Resource Efficiency and Pollution Prevention and Management

Given the location, type and scale of the project, significant amount of dredged material will be handled and managed. The dredged materials are expected to be contaminated with chemicals and plastics and can be deemed as hazardous material. The potential adverse risks and impacts related to dredging, storage, transportation, and disposal of these materials will be assessed in detail during the ESA process with proposed mitigation measures. Dredge Disposal Management Plan will be prepared as part of ESIA which includes location specific sediment analysis, safe lifting and removal of dredge material, land suitability analysis for disposal of dredge materials and safe disposal or reuse of dredge material consistent with WB ESF and international standards/good practices.

Potential pollution will also come from disposal of construction wastes during construction works of road and rail bridges and STPs and other onsite sanitation facilities, as well as use of hazardous materials such as chlorine and discharge of sludge and effluents from the STPs during the operation phase. The ESIA and the feasibility study will provide detailed analyses on these investments and will assess the potential impacts of waste handling and disposal and inform the ESMP of the requirements for appropriate hazardous and non-hazardous waste disposal practices for mitigating and preventing pollution from the mentioned sources. Waste management and pollution mitigation measures will be further addressed in the waste management procedures under the contractors' ESMP. Furthermore, pollution prevention will be addressed through the project intervention of building the wastewater treatment plant, which will be designed according to WB EHS Guidelines and international standards.

Greenhouse gas emissions from the project (components 1, 2 and 3) will be calculated following the methodology developed by the World Bank and will be integrated into the ESIA . Furthermore, the project will ensure integration of technically and financially feasible measures for improving efficient consumption of energy, water, and as well as other resources during implementation of project and in operation of the STPs and other onsite sanitation facilities of component 2.

ESS4 Community Health and Safety

The aspects of community health and safety that need to be considered include dredging, storage, transportation, and disposal of contaminated dredged materials, waterway and road traffic disruption and safety in impacted areas, community health issues and safety risks at the construction sites, hazardous substances generated during construction process, and public safety concerns. These risks and issues will be assessed during the ESIA process and mitigation measures will be developed and incorporated as part of ESMP for application during the detailed design, bidding, construction or operational phases.

Procedures for safe management of dredging sludge including pre-identification of sites for the safe disposal of sludge will be done as per standard measures in the WB EHS guideline to ensure the community health and safety of communities and included in contractor ESMP during storage, transportation and disposal of sludge. The EHS measures will also address protection from COVID19 as per WHO guidelines and relevant national legislation. The contractors ESMP will include measures to mitigate and minimize the related risks of waterways and road traffic and will put in place traffic management to address the inconveniences.

While the use of highly toxic substances in the STP operation is not likely, the ESIA will identify and assess health risks of the pollutants emitted from and the chemicals used for wastewater treatment, and ESMP will include recommendations on the size of buffer zone and Emergency Response Plan will be prepared as part of the WWTP's operational manual. The ESIA will assess risks posed by security arrangements to those within and outside project site and the ESMP will include the measures to avoid, mitigate the identified risks in accordance with ESS4.

The initial assessment based on the Bank's Good Practice Note of Major Civil Constructions rates the project's SEA/SH risk as moderate. The project SEA/SH Management Plan will detail the relevant mitigation measures which will also include provisions for the contractors to adhere to a Code of Conduct (CoC) as part of contractor's ESMP.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project anticipates land acquisition for STPs and for the construction of the road and rail bridges. In addition, the project may also to try negotiated land purchase in some cases. Also, for the disposal of dredge materials/sludge, some land acquisition may be required in case government owned land is not found available for this purpose.

However, in all cases, the project activities are expected to lead to displacement of a significant number of informal occupants from their existing tenements and/or businesses requiring necessary compensation and rehabilitation, as appropriate, for all such project affected persons (PAPs). The client/IAs will prepare a Resettlement Policy Framework

(RPF) before appraisal and based on this RPF, subsequently during implementation, site-specific Resettlement Action Plans (RAPs) with in-depth census survey of the PAPs will be prepared. The preparation of the RPF and RAPs will involve close and meaningful consultations with the PAPs and as well as with other relevant stakeholders, in particular, with the vulnerable PAPs, to incorporate their comments and feedback, and appropriate compensation measures with the objectives of improving their livelihoods in line with the ESS5.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is relevant as project activities are expected to impact aquatic and riparian terrestrial flora and fauna. The main activities of components 1 and 3 will be implemented within rivers and canals of Dhaka which are home to aquatic species. Aquatic ecology is likely to be disturbed due to dredging activities within the riverbed. In addition, land clearance will be required for demarcation of their boundaries and land reclamation of component 1 and construction of STP of component 2, which could be either agricultural landscape or built-up areas.

The aquatic environment within the project footprint have been disturbed by human activities and polluted by wastewater and solid domestic wastes. An aquatic, riparian and terrestrial baseline assessment will be undertaken to confirm existing conditions as part of project preparation and the influence area will be classified accordingly.

The dredged material will also not be disposed in or near any critical habitat or area of high biodiversity value. The ESIA process will take into account the adverse impact on aquatic ecosystems during dredging (e.g. increased noise and water turbidity, accidental pollution from spillage of dredged materials; construction and operation of STPs in the project area of influence in the Dhaka watershed. The Borrower will conduct the ESIA in accordance with requirements of ESS6 during project preparation and implementation, including impacts on modified, natural and critical habitats if any identified, such as the waterways and their ecosystems during construction and operation. The ESIA during project preparation will assess potential risks and impacts to natural habitats from the various project activities, including potential direct, indirect, and cumulative impacts on key biodiversity receptors and identify appropriate measures to avoid, mitigate, minimize or compensate for the disturbance or negative biological impacts.

A dedicated biodiversity management plan commensurate to existing conditions vis a vis expected impacts over biodiversity values and monitoring plan will be required.

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

This ESS is not considered relevant at this stage of the project. However, during the preparation of the ESIA and socio-economic survey, if any indigenous communities are found in the project footprint areas, an Indigenous Peoples' Framework (IPF) will be prepared based on which site-specific standalone Indigenous Peoples Plan will be prepared during implementation.

ESS8 Cultural Heritage

As it is expected that project sites will be located in well-developed 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

No financial intermediaries will be engaged in this project

B.3 Other Relevant Project Risks

N.A.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	Yes
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

The project will be jointly funded with Asian Infrastructure Investment Bank (AIIB). However, it's decided that the Bank's ESF will be adopted for the project by both institutions.

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

Actions to be completed prior to Bank Board Approval:

- Preparation, consultation and disclosure of an ESIA
- Preparation, consultation and disclosure of a Cumulative Impact Assessment (CIA)
- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP)
- Preparation and disclosure of Labor Management Procedures (LMP)
- Preparation, consultation and disclosure of RPF
- TORs for ESIAs/ ESMPs and RAPs for the site-specific/sub-projects to be implemented during project implementation
- Preparation, consultation and disclosure of Indigenous Peoples' Framework (if necessary)

- E&S audits of the associated facilities (if applicable)
- Institutional Capacity Assessment and Institutional Capacity Development Plan
- Preparation and disclosure of Environmental and Social Commitment Plan (ESCP)

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

- Implementation of Stakeholder Engagement Plan (SEP)
- Implementation of Labor Management Procedures (LMP)
- Preparation, implementation and monitoring of ESIA/ESMP
- Definition and implementation of specific mitigation measures to address Project's contribution to cumulative impacts over selected Valued Environmental and Social Components (VECs) and foster coordination with agencies which are concurrently developing other infrastructure projects in the same rivers, whether or not they are being financed under Bank operations
- Preparation, implementation and monitoring of RAPs
- Preparation, implementation and monitoring of Indigenous Peoples Plan (if necessary)
- Implementation of Institutional Capacity Development Plan for the IAs and setting up of an E&S Unit for the project in each IA
- Implementation of the corrective action plan to respond to the gap-filling measures of the E&S audit of the associated facilities (if applicable)

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS	02-May-2022

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: People's Republic of Bangladesh

Implementing Agency(ies)

Implementing Agency: Ministry of Water Resources

Implementing Agency: Ministry of Local Government, Rural Development, and Co-operatives

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Ahmed Shawky M. Abdel Ghany, Deo-Marcel Niyungeko, Jiang Ru
Practice Manager (ENR/Social)	Robin Mearns Recommended on 30-Mar-2021 at 05:56:50 GMT-04:00
Safeguards Advisor ESSA	Charles Ankisiba (SAESSA) Cleared on 29-Apr-2021 at 12:19:42 GMT-04:00