

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

**RECOVERY AND ADVANCEMENT OF INFORMAL SECTOR
EMPLOYMENT (RAISE)**

**WAGE EARNERS' WELFARE BOARD (WEWB)
MINISTRY OF EXPATRIATES' WELFARE AND OVERSEAS
EMPLOYMENT (MEWOE)**

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EXECUTIVE SUMMARY

To accelerate economic transformation, the GoB has emphasized labor intensive job creation in the modern sector, but there are programming gaps for boosting employment for low income urban youth, to enhance coverage of labor market programs for post-COVID recovery and assisting returnee migrants who have been forced to deport due to COVID-19 pandemic. Globally, labor market interventions have proven to be a popular instrument in COVID response and recovery. The Project intends to provide apprenticeship opportunities to low income urban youth as well as provide psychosocial support, referral services and stipend to returnee migrants who were forced to leave their country of employment due to COVID-19 pandemic. The pressure of returnee migrants are manifolds—loss of remittance, uncertainty of securing the lost job overseas, lack of employment opportunity in the local market which is already burdened with the rise of unemployment, social integration of the returnees etc.

The project has five related components: (of which WEWB will be implementing Component 3)

- **Component 1** builds the system that will help workers identify their aspirations, strengths, and constraints (e.g. human capital, or financial). The systems established under Component 1 would be of use in a) screening potential beneficiaries for services provided under Component 2; b) case management of beneficiaries enrolled in Component 2 programs including M&E and tracking employment status of beneficiaries six months after completion; and c) providing information on services offered outside the supported project, depending on the results of the profiling. Component 1 would be open to all interested members of the labor market, aged 15 to 34 and under class 8 education, and the emphasis would be on services for members of low-income urban and peri-urban living households.
- **Component 2** addresses the specific needs of improving the employability and productivity of youth from low income urban and peri-urban households through a package of services, including imparting essential life skills; on-the-job-learning opportunities through informal apprenticeships; access to seed capital, and coaching and mentoring. These services would be designed to enable beneficiaries to acquire aptitude and experience for entering informal wage employment or self-employment once they complete the program.
- **Component 3** This component would be supporting the Government of Bangladesh's (GoB) ongoing measures to provide psychosocial support, orientation program, referral services to other training and job placement services, stipends to those who joins such services, provision of Welfare Offices in various districts to provide these supports and creation and maintenance of a digital database to track and monitor the migrants.
- **Component 4** This component will support the establishment and operation of Project Management Units (PMU) at PKSF. This component will also support the establishment and operation of Project Implementation Units (PIUs) in the Partner Organization (POs) that will be implementing the economic inclusion programming under Component 2. Each PO will be competitively selected by PKSF based on a set of criteria, including past performance; capacity to deliver all four elements of the economic inclusion package, and administration of the case management system.
- **Component 5** would be a Contingent Emergency Response Component (CERC). This is a provisional zero amount component to allow for rapid reallocation of loan proceeds from other project components during an emergency.

During preparation of this ESMF, potential beneficiaries and local stakeholders were consulted, and their opinions were sought about the potential risks and mitigation measures. Prior to COVID-19 related

restrictions on movement were put in place, a number of stakeholder consultation meetings were held. Opinion/concerns of the stakeholders, to the extent consulted, have been considered in this ESMF. Relevant information on COVID-19 following the WHO guideline were delivered to the people including guidance on regular hand washing, social distancing, behavioural change, isolation, etc. The Project has developed a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. Considering the project nature, location, magnitude of impacts, etc. potential risks and mitigation measures have been suggested in this ESMF following the World Bank ESF.

This ESMF is built on Component 3 of the Project to be implemented by Wage Earners' Welfare Board (WEWB). The Project's Component 3 would provide orientation services, psychosocial support and referral services, a one-time stipend to returnee migrants who would join the referral services as well as provision of an integrated returnee migrants' database. With the information at hand at the moment, these activities will not be environmentally degrading will leave minimum environmental footprint except for the likely improper disposal of Personal Protective Equipment (PPE). Since potential type of activities are not likely to cause any environmental impact the Environmental risk will be Low.

On the social side, COVID-19 crisis has rendered the earning of returnee migrants to spiral below a liveable level causing social tension and potential social instability. Selection and inclusion of returnee migrants (including their minority groups and the disabled) will be a major challenge. Given the COVID-19 pandemic, without proper protocol enforcement beneficiaries undergoing psychosocial, referral and orientation program support may be exposed to the virus. Ensuring protocol enforcement may pose challenges as well since some of the intended beneficiaries may be reluctant to follow the same. Though the GBV risk assessment for the project has been estimated to be Low, the female returnee migrants may nonetheless be subject to Gender-Based Violence (GBV) in the hands of the beneficiary selectors and Welfare Officers where they will be provided with Project benefits and support. The social risk is likely to be Moderate.

In line with the requirement of ESF, a Stakeholders Engagement plan (SEP), Labor Management Procedure (LMP), environmental and social commitment plan (ESCP) have been developed. Apart from these, a Grievance Redress Mechanism (GRM) for the potential affected and beneficiary groups have been designed. A separate GRM to deal with labor issues has been formulated. A specific section on COVID-19 risks and awareness has also been formulated in the LMP. It is ensured in the ESCP and ESMF that labor and others associated with the project implementation will be trained on COVID-19 protocols.

WEWB and PKSF, the two Implementing Agencies (IAs) of the project will have two separate Project Management Units (PMU). WEWB will be responsible for the Component 3 and 4.2 implementation and PKSF will implement Component 1, 2 and 4.1.

Capacity assessment of the IAs have been carried out for implementing ES obligations as well as capacity development measures like manpower and training also have been recommended in the ESMF.

ABBREVIATIONS

AP	Affected People
COVID-19	Coronavirus Disease 2019
ESMF/P	Environmental and Social Management Framework/Plan
E&S	Environment and Social
EHS	Environmental Health and Safety
ESF	Environmental and Social Framework
ESMF	Environment and Social Management Framework
ESIA	Environment and Social Impact Assessment
ESS	Environment and Social Standards
GBV	Gender-based Violence
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
IA	Implementing Agency
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MFI	Micro-Finance Institution
MICS	Multiple Indicator Cluster Survey
MEWOE	Ministry of Expatriates' Welfare and Overseas Employment
NCD	Non Communicable Disease
PD	Project Director
PKSF	Palli Karma Sahayak Foundation
PI/MU	Program Implementation/Management Unit
PPR	Public Procurement Rule
SEP	Stakeholder Engagement Plan
WEWB	Wage Earners' Welfare Board

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INTRODUCTION AND PROJECT DESCRIPTION

Background

1. Bangladesh has made rapid social and economic progress in recent decades, reaching lower-middle income status by 2015. Gross domestic product (GDP) growth averaged close to 6 percent annually since 2000 and, according to official estimates, accelerated to over 8 percent in FY19. However, the pace of poverty reduction slowed in recent years even as growth accelerated, particularly in urban areas. Similarly, the progress on shared prosperity slowed between 2010 and 2016 after a decade of improvements, with annual consumption growth of the bottom 40 percent trailing that of the overall population (1.2 versus 1.6 percent). Further, international migration has played an important role in the country's development narrative in terms of household income and macroeconomic stability. By migrating to overseas markets, workers that had prior work experience in Bangladesh are able to earn three to four times more than what they had earned before migrating. About eight percent of households in Bangladesh have at least one member working as an international migrant. The international migration flows are substantial with 597,000 workers being deployed from Bangladesh into overseas markets every year, on average, in the 2012-17 period. Remittances flowing back to migrants' households are also important, equivalent to about two-thirds of total income in households with at least one international migrant. The international remittance flows are also critical for aggregate growth and macro-economic stability. Remittance flows are equivalent to six percent of GDP, and greater than four times FDI and ODA combined. By value, it is equivalent to a third of export revenue. Recognizing the importance of international migration, the topic features prominently and regularly in the country's development strategy, as reflected in its Five-Year Plans prepared by the Planning Commission and in the forthcoming National Jobs Strategy.

2. The COVID-19 pandemic brought about major disruptions to economic activity domestically and through declining exports and remittances. In the first half of FY20 (July to December), growth decelerated as slower global trade and deteriorating external competitiveness lowered exports and tighter access to finance constrained private investment growth. Inflation reached 5.4 percent y-o-y by the end of May 2020. GDP growth in FY20 is projected to be in the range of 1 to 1.6 percent. In FY21, growth is projected between 1.0 and -3.0 percent.

3. Involuntarily returning migrant workers, and lower future demand for Bangladeshi migrants may also produce upward pressure on the labor supply. Returning migrants in response to COVID pressures and demand slowdowns in major destinations for Bangladeshi migrant workers also affect the medium-term demand for workers from Bangladesh. Since the start of the crisis, there have been reports of pressure to accelerate involuntary return. In some cases, the volume of returning migrants is expected to be of crisis proportions. These crashes in migrant flows could be devastating for the economy. Workers that had been previously cleared to depart with secured jobs are now unable to leave due to the travel restrictions. Finally, there is uncertainty about whether demand for migrant workers may rebound in destination countries, and what occupations may be in demand.

4. Involuntarily returned migrants could face additional challenges even after return, and there are no programs to support their transition back to the domestic economy. Between January to April 2020, over 250,000 migrants have returned to Bangladesh, and estimates suggest up to two million may be expected to return over the coming months. Once back home, returnees face multiple challenges including lack of employment opportunities; limited access to social safety nets, and even discrimination by community members fearful that migrants may transmit COVID-19. Bangladeshi migrant workers also tend to experience some of the highest costs to migrate in the world, equivalent to 6-9 months of wages at destination. If migrant workers are involuntarily returning before their planned return, they may be coming back with substantial debt burdens. Addressing the reintegration needs of the returnees requires multidimensional

interventions that would enable them to establish the economic, social, and psychosocial relationships necessary to participate in livelihood activities and civic life in a dignified manner.

Project Description

5. The Project aims to enhance access to earning opportunities for low income youth, including COVID-affected and returning migrants, in urban areas.

6. The project will support two interrelated programs. The first is an economic inclusion program for the following beneficiaries: low-income, less-educated urban youth, including those whose livelihoods have been affected by COVID. The second is a program to support the transition of returning migrant workers into the Bangladeshi labor market. The two programs would be linked through a system of referrals such that eligible returning migrants could be referred to programs or services offered by PKSF, the Ministry of Expatriate Welfare and Overseas Employment or other institutions that may be relevant for them.

7. Components 1 and 2 relate to the economic inclusion program, and will be implemented by the *Palli Karma-Sahayak Foundation* (PKSF) and its network of Partner Organizations (POs). Component 1 will design the curriculum of the training and interventions that will be offered to beneficiaries, as well as the information system that will be necessary to help the beneficiary successfully access and navigate the services. Component 2 will be the actual provision of four sets of services: community outreach, profiling and counseling (subcomponent 2.1), skill-acquisition through on-the-job experience as an informal apprentice (subcomponent 2.2), business management training (subcomponent 2.3), and access to credit (subcomponent 2.4). These services will be delivered in a manner that minimizes the risks of COVID-19 transmission, and will also include training to the beneficiaries on how to conduct business and trade in a manner that minimizes transmission risk.

8. A returning migrant beneficiary will be in a parallel and related system, and receive a different set of benefits through Component 3. Component 3 will be implemented by the *Wage Earners Welfare Board* (WEWB) under the Ministry of Expatriate Welfare and Overseas Employment (MEWOE). The program will support eligible and interested return migrants to be either sustainably reintegrated into the domestic labor market or be able to access services to prepare for re-migration. The project will also support an upgrade and integration of the migration management systems (databases, services, and systems) within the MEWOE, which will streamline social protection service delivery for aspiring migrants, currently deployed migrants, and returning migrants; and enhance the safety and productivity of future migrants.

9. The returnees will be registered into the return migrant registry upon re-entry to Bangladesh. If they wish to receive support for economic or social reintegration, or re-migration they can visit the nearest district-level Welfare Office operated by the WEWB, and operationalized under the project. At the Welfare Office the returnees will receive counseling on the services offered by WEWB and other MEWOE agencies that they are eligible for, and that best align with their interests and identified needs. If they require services for reintegration or remigration, the welfare office would provide a referral to the relevant service, as well as cash support to facilitate the uptake of the service. If the returnee requires other welfare-related services, they would be referred to those.

Selection of Migrant Beneficiaries:

10. Any return migrant worker that has returned to Bangladesh since February 2020 will be eligible.

11. Eligibility verification will be:

Return migrants that have been registered by the systems developed under the GoB repatriation program, or registered into the returnee database will have their recent return status automatically verified.

Return migrants that are not included in the database or systems (such as due to coming back before the systems were online, or on their own resources) will need to provide proof of their last return,

such as their contract, re-entry documentation from Bangladesh SB during immigration, and/or flight details.

12. Return migrants would be informed about the program during their re-entry into Bangladesh, and/or through social mobilization, and public communication campaigns in high migration districts.

Purpose of the ESMF

13. As specific project designs (including Welfare Office sites) are yet to be identified, a *framework approach* has been adopted through the development of an Environmental and Social Management Framework (ESMF). The *framework* for carrying out ES assessment of Component 3 tasks/interventions to be implemented under the project has been prepared based on an *overall ES assessment* of the preliminary selected projects. This Environmental and Social Management Framework (ESMF) is an integral part of the project document.

14. The ESMF illustrates policy, procedure and directives on how to assess specific ES risks and provide guidance to mitigate them. The ESMF also provides guidelines for screening of activities for ES risks and assessment of Borrower's capacity and institutional requirements. During implementation, site-specific ES assessments will be carried out in accordance ESMF, which will be prepared and implemented prior to the commencement of the specific work. The site specific assessments will help adoption of mitigation measures against the ES risk and impacts (through preparation of ESMP) and to address the issues of inclusion, social vulnerability of certain groups, gender and GBV, consultation and communication strategy and any other issues identified via the assessment and the stakeholder consultations.

15. The main purposes of this ESMF are to:

- Provide tools and guidelines for environmental and social (ES) risk categorization of all the activities to be implemented under the Component for which detail information are not available at this stage
- Set out the detailed procedures to be followed for various interventions to assess and manage ES risks
- Consider in an integrated manner, the potential ES risks, benefits and impacts of the project and help identify measures to avoid, minimize and manage risks and impacts while enhancing benefits
- Ensure all relevant ES issues are mainstreamed into the design and implementation of Component 3.
- Provide guidance for preparation of various Environmental and Social Framework (ESF) related instruments
- Provide guidance for ensuring stakeholder engagement at various stages of implementation.

16. Once details of the **project design** are available at later stages of the project, the need for and type of ES assessments and management plans, will be reviewed, according to World Bank (WB) policies and Government of Bangladesh (GoB) legislation.

Methodology

17. The methodology followed in preparing the ESMF consists of the following steps:

- Review Project documents and meeting/discussions with various stakeholders including Implementing Agency (IA) and the WB
- Review policy and regulatory requirements
- Initial scoping and screening to determine the key ES parameters and aspects that are likely to be impacted by the Project activities
- Collection and analysis of baseline ES data, with the help of secondary literature review, and field data collection
- Consultations with the stakeholders including beneficiary/ affected communities and developing the consultation process
- Review the potential and likely impacts of the program activities and carrying out the screening of the activities

- Outline the detailed procedures to be followed to comply with the WB and GoB rules and regulations including preparation of various ES documents, monitoring mechanism, stakeholder engagement, disclosure requirement, grievance redress and institutional arrangement.

Analysis of Alternatives

18. An analysis of alternatives is presented below for the following scenario: with/ without project alternative.

Component 3 of the project aims at providing orientation services, psychosocial services, referral to existing training and skilling opportunity, awareness raising, and a one-time stipend to those who would adopt the referral services. The interventions are designed to equip returnee migrants to absorb initial shock, network with job opportunities, a pathway to master marketable skills and to raise awareness about migration issues.

The returnee migrants have been deported due to COVID-19 pandemic and face ostracizing in the society, lack of network, loss of financial earning and desperation which might led them to resort to illegal activities to meet end meets.

Without project interventions a large part of working individual would prove themselves to be burden on the society and their families would be in ruins—socially and financially. It is the right execution of planned activities that may result in their reintegration in the society as earning members and future migration to their host countries.

19. In conclusion, it is clear that the project implementation would improve access to earning and training opportunities for the returnee migrants, improve their living conditions and work as a buffer to absorb the shock posed by their return.

LEGAL, REGULATORY AND ADMINISTRATIVE FRAMEWORK

Introduction

1. Bangladesh has a number of environmental and social laws, acts and regulations to ensure any intervention meets various environmental and social safeguard criteria thus assisting the preservation of nature and social environment. GoB has already incorporated environment and biodiversity conservation in its constitution in the 15th amendment (act no. 14 of 2011). GoB also revised National Environmental Policy, 1992 and Environmental Conservation Rules (ECR), 1997 and adopted Environmental Conservation Acts in 1995. Social policy regarding Labor Laws/Act, laws regarding women's rights, laws addressing contagious diseases, overseas employment and migration act etc. also come in to application in this project. Further WB's Environment and Social Framework (ESF) and Environment, Health and Safety Guidelines (EHSGL) have their applicability in the project. A review of these policies and legal instruments are presented in this section.

Review of National Environmental & Social Acts, Rules, Policies and Strategies

Constitution of Bangladesh (Relevant sections)

2. Article 18A of the constitution of Bangladesh recognized the environmental conservation and natural resources management for the betterment of its present and future citizen. This article stated as "The State shall endeavour to protect and improve the environment and to preserve and safeguard the natural resources, bio-diversity, wetlands, forests and wild life for the present and future citizens".

Overseas Employment and Migrants Act 2013 (Act No. VL VIII of 2013)

3. This is an Act enacted to promote opportunities for overseas employment and to establish a safe and fair system of migration, to ensure rights and welfare of migrant workers and members of their families, by repealing the Emigration Ordinance, 1982 (Ordinance No. XXIX of 1982), and for making provisions in conformity with the International Convention on the Rights of Migrant Workers and the Members of Their Families 1990 and other international labour and human rights conventions and treaties ratified by the People's Republic of Bangladesh.

Bangladesh Labor Act, 2006

4. The Bangladesh Labour Act was adopted in 2006. The act consolidated the laws relating to employment of workers, relations between workers and employers, determination of minimum rates of wages, payment of wages, compensation for injuries to workers during working hours, formation of trade unions, raising and settlement of industrial disputes, health, safety, welfare and working conditions and environment of workers and apprenticeship and matters ancillary. The act has widened benefits of the workers particularly women workers

Sustainable Development Goal (SDG) sections 8

5. The Sustainable Development Goals (SDGs) are globally accepted development goals that focuses on 17 goals with 169 targets and 230 indicators. The project will contribute to achieving SDG8 i.e. 'Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all'. This project component is more important in the sense that the present COVID-19 pandemic has caused 1.6 billion worker in the informal economy to lose their livelihood and could cause 400 million job losses in the second quarter of 2020.

National Environmental Policy, 2018

6. The policy has identified twentyfour sectors of different attributes to ensure environmental conservation and management. 'Safe food and water' and 'Public Health and Health Services' are the two important sectors among them that the policy focuses on. This two sectors are closely linked with this project. It also prohibits establishment of industries and waste discharge point and waste dumping centres, sanitary land fill etc. which are closed to water sources. The National Environment Policy recognizes that clean environment is the pre-requisite of good health. Hence, it includes environmental conservation issues related to plans, policies and other programs for the sake of public health in the country.

Environmental Conservation Act, 1995 (amended, 2010)

7. This umbrella Act includes laws for conservation of the environment, improvement of environmental standards, and control and mitigation of environmental pollution. It is currently the main legislative framework document relating to environmental protection in Bangladesh, which repealed the earlier Environment Pollution Control ordinance of 1977.

Environmental Conservation Rules (ECR), 1997 (amended, 2020)

8. The Environment Conservation Rules (ECR), 1997 and its amendment in 2010 provide a first set of rules under the ECA, 1995. These provide standards and guidelines for requirement for undertaking Initial Environmental Examination (IEE) and Environmental Impact Assessment (EIA), as well as formulating an Environmental Management Plan (EMP) according to categories of industries/development projects/activities. It is to be noted that the Department of Environment (DoE) will review/ approve few of each activities. ESIA and ESMP will be reviewed by WB ES teams.

National Health Policy (NHP) 2011

9. National Health Policy (NHP) 2011 views access to health as a part of recognized human rights. In order to achieve good health for all people, equity, gender parity, disabled and marginalized population access in health care need to be ascertained.

National Women Development Policy 2011

10. This policy was developed with the objective to establish equal rights of men and women in areas of state and public life, to ensure security and safety of women, to ensure the socio-economic, political, administrative and legal empowerment and to establish human rights of women.

Communicable Diseases (Prevention, Control and Eradication) Act 2018.

11. The Act was passed in 2018 and it repealed and merged some of the dated laws and ordinances regarding infectious disease control, including the Epidemic Diseases Act (1897), the Public Health (Emergency Provisions) Ordinance (1944), the Bangladesh Malaria Eradication Board Ordinance (1977) and the Prevention of Malaria (Special Provisions) Ordinance (1978). The objective is to protect the people from the national and international spread of infectious diseases, to prevent, control and eradicate such diseases, to issue global alerts and to increase mutual support for the outbreak of the disease, to increase the capacity for precise risk management and to spread related education, to review the progress of diseases, to protect rights including Systematic loss.

World Bank’s Environmental and Social Framework (ESF)

12. The Environmental and Social Framework (ESF) has 10 Environmental and Social Standards (ESS) of them some are relevant to this project.

Table 1. ESF Requirement and Relevance with the Project

ESSs	Requirements	Extent of Relevance to the Project Component
ESS-1 Assessment and Management of ES Risks and Impacts	The types of ES risk and impacts that should be considered in the ES assessment, provision of various ES instruments and use and strengthening of the Borrower’s ES framework.	Relevant and provides basis for ES risk and impact assessment and mitigation measures
ESS-2 Labour and Working Conditions	Provisions on the treatment of Project workers, terms and conditions of work, non-discrimination and equal opportunity, provisions on child labour and forced labour management and occupational health and safety measures	Relevant and provides guidance for addressing labor related issues. The project will employ Direct and Contracted workers
ESS-3 Resource Efficiency and Pollution Prevention and Management	Requirements on management of wastes, chemical and hazardous materials and contains provisions to address historical pollution and overall use of resource efficiently.	Relevant and provides guidance addressing issues of waste pollution management
ESS-4 Community Health and Safety	Takes into account community safety, concept of universal access, traffic and road safety including road safety assessments and monitoring. Requirement of necessary protective measures against COVID-19 for the workers and others associated with the project	Relevant and provides guidance on addressing community health and safety issues as well addressing the need for COVID-19 protocol application
ESS-5 Land Acquisition Restrictions on Land Use and Involuntary Resettlement	Illustrates land acquisition, requisition and resettlement issues	Project is not expected to involve land acquisition.
ESS-6 Biodiversity Conservation	Requirements for conservation of biodiversity and management of sustainable management of living natural resources, including primary production and harvesting, distinguishing between small-scale and commercial activities.	The Component 3 of the project is less likely to affect biodiversity.
ESS-7 Indigenous Peoples	Applies when the Indigenous Peoples are present or have a collective attachment to the land, whether they are affected positively or negatively and regardless of economic, political or social vulnerability.	The Component 3 of the project is less likely to affect people/ communities meeting the criteria of ESS7.
ESS-8 Cultural Heritage	Illustrates the need to preserve and protect various types of cultural heritage in the project areas.	The Component 3 of the project is less likely to affect cultural heritage.
ESS-9 Financial Intermediaries	Specifies how FIs will assess and manage ES risks and impacts.	The Component 3 of the project doesn’t involve an FI.
ESS-10 Stakeholder Engagement and	Requires stakeholder engagement throughout the project life cycle, and preparation and implementation of a Stakeholder Engagement Plan	The IA has prepared a Stakeholder Engagement Plan (SEP) identifying various

Information Disclosure	(SEP). Requires early identification of stakeholders, both project-affected parties and other interested parties, and clarification on how effective engagement takes place.	stakeholders and assessing their needs and impacts of the project including setting up of a GRM
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WBG Environmental, Health, and Safety Guidelines (EHSg)

13. The WBG EHSg are technical reference documents that provide information on environmental, health and safety issues, including acceptable pollution prevention and abatement measures and emission levels for WB projects. They contain both general guidelines and industry-specific guidelines in relation to Good International Industry Practice (GIIP).

14. The general guidelines include the following topics:

Environmental(AirEmissionsandAmbientAirQuality;EnergyConservation;Wastewaterand Ambient Water Quality; Water Conservation; Hazardous Materials Management; Waste Management; Noise; ContaminatedLand)

OccupationalHealthandSafety(GeneralFacilityDesignandOperation;Communicationand Training; Physical Hazards; Chemical Hazards; Biological Hazards; Radiological Hazards; Personal Protective Equipment (PPE); Special Hazard Environments;Monitoring)

Community Health and Safety (Water Quality and Availability; Structural Safety of Project Infrastructure; Life and Fire Safety; Traffic Safety; Transport of Hazardous Materials; Disease Prevention; Emergency Preparedness andResponse)

Construction and Decommissioning (Environment, Occupational Health & Safety; Community Health &Safety)

15. Environment, Health and Safety (EHS) issues should be incorporated into ES assessment and management process, which will include:

Identification of EHS risks early in the project, including the Welfare Office selection process, design and engineeringaspects.

The likelihood and magnitude of EHS risks should be based on nature of the project activities. Thereshouldbeanobjectiveofoverallreductionofrisktohumanhealthandtheenvironment, focusing on the potential impacts and elimination of cause of hazard at the source. Where impacts cannot be avoided, engineering and management controls should reduce or minimize magnitude ofimpacts.

Procedures for accidents should be prepared, including preparation of workers and communities.

EHS performance improvements, and ongoing monitoring performance andaccountability.

ENVIRONMENTAL AND SOCIAL BASELINE DATA

Land Environment

1. The land area of the country may be divided broadly into three categories i.e. floodplain (80 %), Pleistocene terrace (8%), and tertiary hills (12 %) based on its geological formation. The floodplain comprises of a succession of ridges (abandoned levees) and depressions (back swamps or old channels). Differences in the elevation between adjoining ridge tops and depressions range from less than 1 meter on tidal floodplains, 1 meter to 3 meters on the main rivers and estuarine floodplains, and up to 5 to 6 meters in the Sylhet Basin in the north-east¹. Only in the extreme northwest do land elevations exceed 30 meters above mean sea level. The tertiary hill soil occupy the Chattogram hills in the south-east, and the low hills and hillocks of Sylhet in the north-east. The two major uplifted blocks (Pleistocene terrace) are known as Madhupur (in the central Bangladesh) and Barind tracts in the north-west.
2. The land type of the country has been classified according to depth of inundation with seasonality. All land types except highlands are exposed to monsoon flooding for part or whole of the year. Land area with different flood depths as well as seasonality is given in Table below.

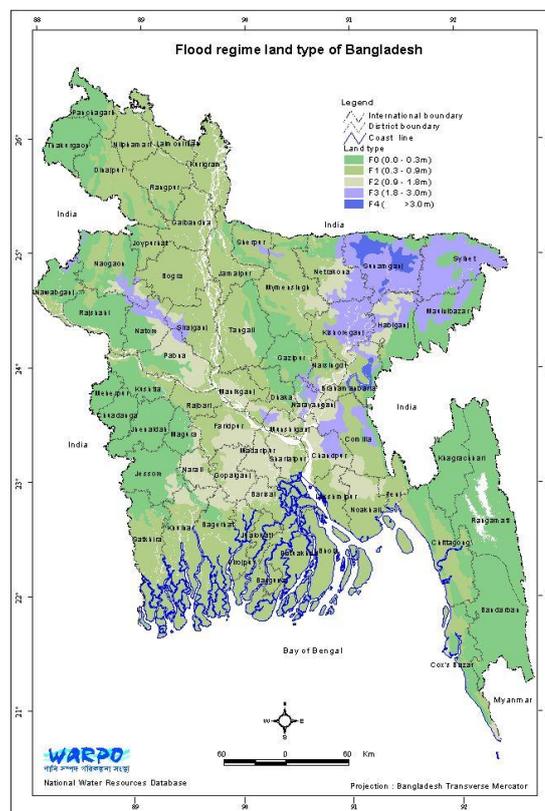


Table 2. Land Areas of Different Flood Phases

Land type	Maximum depth of flooding	Seasonally flooded	Permanently flooded
Medium Highland 1 (F ₀)	0.3m	16%	0%
Medium Highland 2 (F ₁)	0.9m	44%	1%
Medium Lowland (F ₂)	1.8m	23%	1%
Lowland (F ₃)	3.0m	11%	3%
Very lowland (F ₄)	>3.0m	1%	1%
Total		95%	6%

Source: WARPO (2001)

Physical Environment

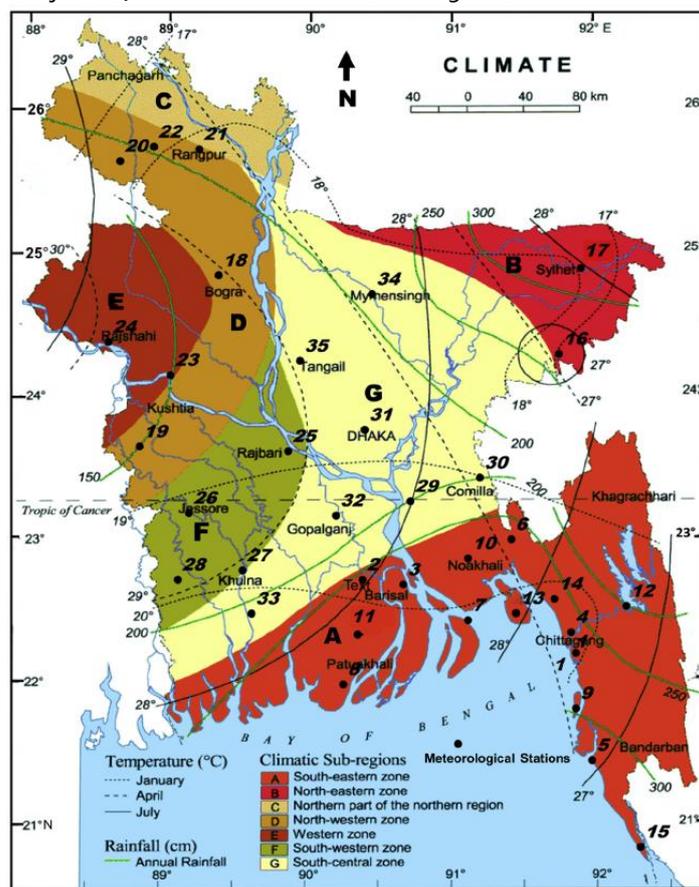
3. Bangladesh, except for the hilly regions in the northeast and southeast as well as terrace land in northwest and central zones, is one of the largest deltas in the world, formed by the dense network of the tributaries and distributaries of the mighty rivers namely the Ganges, the Brahmaputra and

¹Huq S., Karim Z., Asaduzzaman M. and Mahtab F., (2013) Vulnerability and Adaptation to Climate Change for Bangladesh, Springer-Science and Business Media, BV

the Meghna. The total land area is 147,570 km² and the Project intervention would cover an area of 15% of total land scattered all over Northern, Central and Northeastern Bangladesh.

Climate

- The overall temperature and rainfall patterns in Bangladesh are shown in the figures below. The different climatic sub-regions are also shown. In this project, the main regions of interest are: North-eastern zone (Sylhet), northern part of Central zone (Mymensingh), North-western zone (Rangpur), Western Zone (Rajshahi), South-eastern Zone (Chattogram).



Source: Khan et al (2018)²

The basic climate parameters for the four Divisions (Sylhet, Mymensingh, Chattogram and Rangpur) under this project are shown in the figures below.

Social Environment

- Bangladesh's economy has grown well above the average for developing countries, averaging 6.5 percent since 2010, with an officially estimated growth of 7.9 percent in FY18, driven by manufacturing and construction. Per capita income is now US\$1,670 (WB Atlas method, 2018), which is well above the lower middle-income country category threshold which it crossed in FY14. The country has seen significant progress on reducing extreme poverty and boosting shared prosperity, especially through human development. The poverty incidence based on the international \$1.90 per capita per day poverty line (measured on the basis of the Purchasing Power Parity exchange rate) has declined from 44.2 percent in 1991 to a 14.8 percent in 2016 (latest available poverty data).
- The current population of Bangladesh is 164,000,000 as of April, 2020, based on the latest United Nations data. Among them 60.60% population is living in the rural area. According to the population

²<https://www.sciencedirect.com/science/article/pii/S2405844018348928>

census report of Bangladesh Bureau of Statistics (BBS) 2011 the total enumerated population is 142,319,000, comprises of 71,255,000 males and 71,064,000 females, which yields a sex ratio of 100.3 indicating almost equal numbers of men and women in the country.

7. With more than 60 percent of the population living in rural areas, the population in Bangladesh is predominantly rural, so continued investment in rural areas is important to realize the country's human capital potential. For instance, an estimated 35 percent of the population in rural areas lives below the poverty line, while nationally it is 24 percent. At the same time, the rural population suffers insufficient access to quality basic services, such as education, health clinics, and adequate roads, and is most vulnerable to ever-increasing climate change threats, such as sea level rise, floods, droughts and extreme temperature, in one of the most vulnerable countries to climate change. As a result, about 38 percent of rural children under five are stunted or are too short for their age compared to 31 percent in urban areas; urban mothers and spouses are more educated than their rural counterparts.

Migration Issues

Flow of Migrants

8. The Bureau of Manpower Employment and Training (BMET) data (2018) inform that a total of 734,181 Bangladeshi workers migrated to different countries of the world including the Gulf, other Arab and South East Asian countries in 2018. In 2018, the flow of emigration has decreased by 27 percent in comparison to the previous year. According to BMET, from 1976 to 2018, a total of 12,199,124 Bangladeshis have migrated overseas for employment. It does not necessarily mean that at the moment a total of 12.2 million Bangladeshis are working abroad. Bangladeshi workers mainly engage in short-term contract employment; and thus they have to return on completion of their contracts. There is no mechanism in place to record data on returnee migrants and hence it is not possible to have an estimate about the number of migrants currently working abroad. Refugee and Migratory Movements Research Unit (RMMRU) and Swiss Agency for Development and Cooperation (SDC) panel data, 2018 on 20 districts found that among the migrant households, 21 percent were returnee migrants and 79 percent were current migrants.

Female Migration

9. Female migration from Bangladesh has been increasing since 2015. In 2015 female migration increased by 36 percent from the previous year. It registered an increase by 14 percent in 2016 and percent in 2017. The highest number of female workers (121,925) migrated in 2017. But, the flow of female migration has dropped by 17 percent to 101,695 in 2018. There are a few reasons for the drop in the number of female migrants. Since May 2018, many aspirant women migrants felt discouraged to go abroad as the print and electronic media began highlighting the news of return of abused women migrants from the Saudi Arabia. Furthermore, in general there was a drop in the migration flow of both male and female workers from Bangladesh in 2018. In 2017, female migrants constituted 12 percent of the total flow of the year, in 2018 it marginally increased to 13.85 percent. Therefore, the flow of male migration has been lower than female migration in 2018.

Countries of Destination

10. According to BMET, most of the Bangladeshi short-term contract workers mainly go to the Gulf and other Arab states. Almost 64.48 percent of the total number of workers who had migrated from Bangladesh in 2018 went to the Gulf and other Arab states. The majority of the remaining 35.52 percent went to different South East Asian countries. In 2018 the highest number of Bangladeshi workers migrated to Saudi Arabia. The figure stood at 257,317 that is about 35.05 percent of the total flow. Like 2017, the second largest flow in 2018 was also to Malaysia (175,927) that constituted about

24 percent of the total flow. Qatar is the third largest destination country of Bangladeshi workers (10%), while Oman holds the 4th position (9.8%). By receiving 41,393 workers (6%), Singapore became the fifth largest destination country in 2018. The UAE government's ban on migration of male workers from Bangladesh still remains in force. In 2018 there has been a drop in the modest number of female migrants that the country had received in 2017. With a total of 73,713 workers going to that country Saudi Arabia was the largest recipient of female migrant workers in 2018. The figure is 72.48 percent of the total flow of female migrants from Bangladesh. By receiving 11,034 (11%) and 9,100 (9%) female workers, Oman and Jordan hold the second and third positions respectively. 92.28 percent of the total number of female workers has migrated to these three countries.

Skill Composition

11. Skill composition of the migrants who went abroad for work in 2018 shows that the proportion of skilled workers remains the same in 2018 (43.25%) in comparison to 2017 (43.07%). 16 percent of the migrant workers fall under the semi-skilled category, 39 percent of the workers fall under less skilled category. The shares of semi-skilled and less skilled categories also have not changed in a major way from the previous year. 0.36 percent of the migrants belong to professional and 1.8 percent to other categories.

Source areas

12. With 62,562 migrating from the district, Cumilla tops the international migrants' list of source districts. It accounts for 8.52 percent of the total workers. Brahmanbaria ranks second in the list (5.49%). The next 8 important source districts are Tangail (5.44%), Dhaka (4.84%), Chattogram (4.78%), Narsingdi (3.44%), Chandpur (3.30%), Kishoreganj (3.30%), Noakhali (2.97%) and Mymensingh (2.66%). The scenario of the hill districts remain unchanged. In 2018 Khagrachhari, Bandarban, and Rangamati accounted for only 0.10 percent, 0.05 percent and 0.05 percent of the total flow respectively. Those who migrated from this region were mostly from the Bengali community. Most of the indigenous communities in Bangladesh live in this region.

Remittances

13. According to Bangladesh Bank Bangladeshi migrants have remitted US\$15.54 billion in 2018. The figure was 15 percent higher than that of 2017 (US\$13.53 billion). Generally, migrants cannot remit money in the year they migrate. They start doing so from the second year of migration. The increased flow of remittance in 2018 can perhaps be attributed to the massive increase in the outflow of migrants in 2017. Following the trend of the previous year, the highest amount of remittance was received from Saudi Arabia (18.14%). It is followed by the UAE (15.64%), the USA (12.23%), Kuwait (8.40%), Malaysia (7.53%) and the UK (7.10%). Bangladesh Bank reported that Islami Bank Bangladesh Limited has secured over 29.68 percent (US\$3013.61 million) of the total remittances, making it the top remittance receiving bank in 2018. It was followed by Agrani Bank - \$1515.05 million (14.92 percent), Sonali Bank - \$1137.33 million (11.20 percent), Dutch-Bangla Bank Limited - \$936.42 million (9.22%) and Janata Bank - \$907.06 million (8.93%).

COVID-19 Pandemic and Bangladeshi Migrants

14. With Covid-19 pandemic, many migrants were laid off or furloughed without compensation. They are now homebound as the global economy is grappling with the crisis. Uncertainty about their remigration is looming large. At the same time, they face stigma and discrimination given limited scope for social distancing and access to healthcare services.

15. International migration became a key employment option in the context of lack of jobs in country and near half a million workers—mostly rural and low-skilled—sought overseas employment annually. Job seekers, however, were facing shrinking opportunities abroad in recent years. As per IMF, major host countries like Saudi Arabia, UAE and Kuwait were reeling from the 2014-16 oil price collapse with modest recovery prospects in 2020. On the other hand, a push for workforce nationalization programs in Gulf Cooperation Council (GCC) economies like Saudi Arabia contributed to layoffs of Bangladeshi migrant workers. Increased immigration drives also saw mass deportation of undocumented workers.
16. Covid-19 jolted recovery prospects in the region. IMF forecasts GCC economies to contract by 7.6% in 2020. The pandemic's fallouts including collapse in OPEC+ negotiations and ensuing oil price war (led by Saudi Arabia) further weakened the oil-dependent economies as these saw oil prices crash to an 18-year low. The situation deeply impacts remittances inflows to Bangladesh and foreign employment. In the recently concluded FY20, remittances inflows were in a tumult in the last quarter given COVID-19's fallouts. But the inflows accumulated to USD 18.2 billion by the end of the fiscal year (2019) and helped boost forex reserves to about USD 36 billion. At the same time, amidst a global lockdown, about 200,000 workers could not join work despite having legal work permits and necessary documentation. Even while host economies are gradually re-opening and travel bans are lifted, workers are unlikely to start working given fears of surge in COVID-19 cases upon entry. Rather, key host countries have officially requested Bangladesh to repatriate undocumented workers as these economies internalize and respond to COVID-19's impacts. Remittance inflows are likely to remain subdued given slow recovery prospects in GCC countries combined with impacts of low oil prices. Finding new employment or rejoining work are also uncertain options for workers within this context.
17. Bangladesh's domestic economy was hurt by a prolonged shutdown that was put in place to contain the pandemic. It crippled the industrial sector followed by the service sector; micro, small and medium enterprises (MSMEs) were among the worst hit. Various estimates suggest 12-17 million jobs were temporarily lost while 4-12 million jobs were permanently lost over the period. While Bangladesh gradually reopened since 31 May, economic activity has yet to pick up amidst a surge in COVID-19 cases especially in cities like Dhaka, Gazipur and Narayanganj. While the downward pressure on employment persists, the situation is aggravating Bangladesh's existing labour market challenges.
18. According to Refugee and Migratory Movements Research Unit (RMMRU), 60% of migrant households depend on remittances for daily expenses, the inflows act as informal safety nets, and drive positive development outcomes for health, nutrition and education. Early UN insights suggest that without remittance incomes, jobs and social protection coverage, migrant households engaged in distressed asset sales to solve food shortages and meet immediate needs during the lockdown. Moreover, many are likely to remain highly indebted due to high migration costs incurred and untimely return. According to Bangladesh Bank, more than 65% spend BDT 300,000 as migration cost; another 20% pay more than BDT 500,000 to go abroad. Bank loans finance 65% of migration costs, according to RMMRU. As remigration is a difficult option now, the return of migrant workers to rural districts combined with low-income opportunities and piling debts can potentially put pressure on rural economies as well as create poverty pockets especially in migrant-prone areas. At the same time, UN insights point to the stigma and prejudice towards those suspected of COVID-19. Returning migrants were among the first to be singled out when Bangladesh reported its first imported case on 08 March 2020. Panic spread in the early days as local governments struggled to keep track of where returnees were and how many were quarantined, leading to hurried, ad-hoc measures to "contain" them.



IDENTIFICATION OF POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

General

1. The Project will provide undereducated youth with apprenticeship opportunities and the returnee migrants with counseling services, orientation, psychosocial support and referral services along with a one-time stipend. The interventions of Component 3 of the Project, for which WEWB is responsible for will not have any significant environmental risks or impacts. However, the social risks will include exclusion of the vulnerable migrants from project benefits and consultation, GBV on female returnees, issues with community health and safety due to COVID-19 pandemic, selection criteria not in sync with potential beneficiary demand and some minor labor issues.
2. The ESMF addresses these areas to propose policies and procedures regarding mitigation measures and recommend modalities to maximize project benefits for the target population by aligning the project design with the socio-cultural and context specific needs of communities. The expected ES impacts can be mitigated through implementation of appropriate ES management plans. The consequence of COVID-19 may have adverse impact on social issues, including mass isolation and quarantine, lack of manpower availability and consultation, transmission of disease, lack of social distancing measures etc. IA will need to put adequate measures for workers as well as local communities where project will be implemented so that spread of the virus does not deter the project implementation. Considering the overall risk and impacts related to the proposed project activities, the long-term experience and capabilities of the implementing agencies and subsequent measures, the ES risk is rated Moderate.

Potential Environmental Impacts

Given the nature of intervention of Component 3 of the Project, the environment risks and impacts will be negligible. The only source of pollution could be use and improper disposal of Personal Protective Equipment (PPE) by the Welfare Officers, other manpower and the migrant beneficiaries. Protocols for safe disposal of such wastes will be adhered to so that such wastes do not pose any significant environmental risks or impacts.

Potential Social Impacts

4. A number of potential social impacts can arise from the Project interventions:
5. The present COVID-19 crisis has rendered the earning of returnee migrants to reduce extremely setting a chain of uncertain reactions in their livelihood including potential social instability. The most significant sufferers will be those migrants who just have newly joined their country of work and are yet to breakeven against their migration costs. The high number of returnee migrants, spiked through this crisis, would thus proffer to be a major challenge given the fact that number of eligible candidates could outnumber the number of project intended beneficiaries. A case of elite capture might ensue to put specific migrants under project benefits and thus needs to be mitigated through careful selection method and monitoring.
6. Selection and inclusion of returnee migrants (especially women migrants, minority groups and the disabled)—who may lack networking and who may potentially be left out of the community engagement/outreach programs will also be a major challenge. Therefore, differentiated measures

need to be undertaken to include all of these segment who may face disproportionate risk of exclusion.

7. Project beneficiaries may also be ostracized from the society as they already have lost their income as well their pride. They may thus resort to illegal activities to make ends meet.
8. Given the COVID-19 pandemic, without proper protocol enforcement migrants undergoing counseling and psychosocial support may be exposed to the virus. Ensuring protocol enforcement may pose challenges since many beneficiaries may be reluctant to follow the same. Further, with the lack of proper health service in various part of project intervention areas, this has potential to create an obstacle to project progress and achievement.
9. The female beneficiaries in the counseling and referral program may also be subject to Gender-Based Violence (GBV) in the hands of the Welfare Officers/ trainers/ management staff. Due to the breadth of project intervention, monitoring every program closely may be difficult and need comprehensive planning and execution. But given its likelihood the GBV risk assessment for the project has been estimated to be Low.

Social Mitigation Measures

10. Following steps will be taken to reduce the risks and impacts from social point of view:
 - From the outset participation of the vulnerable, disadvantage and women migrants in project planning, decision making as well as access to referral opportunities will be ensured. Selection of these disadvantaged people should get priority over others through a differentiated approach so that the terms and conditions of selection are cognizant to their social standing and vulnerable background.
 - Design measures will be taken in to account universal access philosophy, including access to information, process to raise grievance and other issues.
 - To address the issue of GBV the PMU will put a mechanisms in place as well as a GRM to address this issue of potential GBV.
 - Community health and safety will be ensured through proper design of PPE disposal sites/ dustbins including application of accepted protocols.
 - All Welfare Officers, staffs etc will be provided with training and PPEs and should be required to follow COVID-19 related social distancing measures and protocols. Provision of symptom reporting and medical evacuation also must be in place in case symptoms are seen in any workers.

STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

Introduction

1. For this Project, the PMU have already designed a Stakeholder Engagement Plan (SEP) for engagement and meaningful consultation with all the stakeholders and this section provides a summarized version of the same. The SEP has details about identification and meaningful consultation with various stakeholders as well as an outline of GRM for the project. Due to outbreak of COVID-19 and sudden restriction of movement and maintaining social distance, the extensive field assessment and consultation meetings required for stakeholder engagement were not possible. During limited field visits, discussions were held with the public representatives and other stakeholders on different issues, difficulties in project formulation, implementation and management.

Stakeholder Identification and Analysis

2. The Project stakeholders have been primarily grouped into following three categories:
 - Project Affected Parties: those who are or likely to be affected by the project, and
 - Other Interested Parties: who may have an interest in the project and who could influence the opinions of affected parties either positively or negatively, or affect the implementation process or the sustainability of the project's outcomes
 - Vulnerable Group: Those, who for the specific conditions of vulnerability (women, person with disability, children, female-headed household) are likely share major impact of the project and will have less access to project benefit as well as will be less likely to participate in the engagement process.
3. A general list of stakeholder groups identified is presented in the Table below.

Table3: Potential Stakeholders Group and Interested Parties

STAKEHOLDER GROUP	INTEREST/CAUSE IN ENGAGEMENT
International level	
International Development Association (IDA)	Is financing the project.
National level (Interested Parties)	
Bureau of Manpower, Employment and Training (BMET)	They host the District Employment and Manpower Offices where Welfare offices will be setup
Different government Agencies like City Corporations, Representatives from District Administration etc.	Would be responsible to support WEWB for the successful implementation of the Project. Support/consent from all these agencies is required during the project implementation at different stages.
Mass media (Print and Electronic)	They are intermediaries for informing the general public about the planned activities of the project developer and for information disclosure.
Prospective employers of beneficiaries	They will provide employment opportunities for the project beneficiaries and have a say in project design and content making
Civil Society Organizations (CSOs) and	Different CSOs and women's organizations will be highly interested with the project as during the implementation and operational stages, there would

Women's organizations in the area	be specific programs to redress GBV issues and scope of employment in project activities.
Prabashi Kalyan Bank (PKB) and Bangladesh Overseas Employment Services Limited (BOESL)	These organizations will support access to finance and support for remigration
Researchers (Migration Study), Academics and Think Tanks	Can be involved in understanding migration issues related to COVID-19
Local Level	
Project Beneficiaries (affected people)	Migrants who have involuntarily returned to Bangladesh in the face of the COVID-19 crisis
Project Beneficiaries (Vulnerable people)	Women, single women/ mothers, people with disability, small ethnic community people among the migrants

Engagement Methods and Tools in Light of COVID-19 Outbreak

4. With the outbreak and spread of COVID-19, people have been mandated by national or local law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events have been adopted.
5. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings. Based on the above, specific channels of use for communication need consideration. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:
 - Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
 - If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype;
 - Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
 - Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
 - Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;

Information Disclosure Method

6. The ESMF and other disclosed instruments in Bangla and English languages will be made available for public review in accordance with the World Bank and standard international requirements. Distribution of the disclosure materials will be through making them available online for the moment given COVID-19 situation. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process.

The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials. Basing on the improvement of situation, free copies may be available at PMU and Welfare Office locations. The SEP will remain in the public domain for the entire period of project development. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment. The SEP contains a table outlining Stakeholder Engagement and disclosure methods which may be referred.

Grievance Redress Mechanism

7. The purpose of the GRM is to record and address any complaint that may arise during the life cycle of the project period effectively and efficiently. The GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (PAPs) and the other complainants. The overriding principle of any GRM is that it must be non-threatening, easily accessible, quick and impartial; delivering decisions to the complainant in an unbiased a-political manner. Considering the overall need for the total project period, the PMU will establish GRM to address complaints and grievances. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons resorting to expensive, time-consuming legal actions. The mechanism will, however, not bar an aggrieved person to go to the courts of law. It is essential that an effective and transparent mechanism is designed and established at the earliest opportunity for all members of the community to be able to lodge complaints and grievances. Necessary sign posting/billboard would be placed at the central places/places where people gather for sharing detailed information of the GRCs at every level. The GRM will also be available online so that grievances can be submitted without the need for physical interaction, especially during the time of COVID-19 crisis. Details of GRM, GRC, Channels and Steps to Solution have been provided in the SEP.

World Bank Grievance Redress Service (GRS)

8. Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to the project-level GRM or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS) can be found at <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. Information on how to submit complaints to the World Bank Inspection Panel, visit www.inspectionpanel.org.

METHODOLOGICAL FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

Introduction

1. This chapter outlines the framework for assessing and managing environmental and social risks and impacts. It also provides necessary procedures and tools for screening and assessing ES impacts. The ES assessment of the Component 3 will be carried out based on the provisions of various GoB Laws and relevant WB's Environmental and Social Standards (ESSs).

Environmental and Social Management Procedure

Overall Procedure

2. After the Component 3's full details and design are known, screening of ES risks will be done. The purpose of *screening* is to get a preliminary idea about the degree and extent potential risks and impacts of a particular aspect, which would subsequently be used to assess the need for further ES assessment. The screening would involve: (i) identification of the details of activities; and (iii) preliminary assessment of the impacts of these activities on the environmental and socio-economic environment.
3. The detailed design of Component 3 may require some form of analysis that will help in the preparation of required ES instruments. The recommendations from these ES instruments will need to be incorporated by the design team and also incorporated into the Project Operation Manual. The IA would then need to implement the proposed mitigation measures, monitor and report compliance.

Screening and Categorization

4. The formal ES assessment will be done after identification of the Component's details, specific locations of Welfare Offices, number, locations, background of the migrants etc. Sample ES checklists are provided in the Annex A. The purpose of the checklist is to identify potential risks and concerns to be addressed in the implementation phase of the Component.
5. The final outcome of the screening process is determination of the category of the Component tasks in terms of its ES risks. Considering potential environmental and social impacts and their significance, proposed Component interventions identified in the initial stage of implementation can be categorized into four levels:
 - 1) High Risk
 - 2) Substantial Risk
 - 3) Moderate Risk
 - 4) Low Risk

The figure below describes the different risk levels. In this project, it is expected that of Component 3 intervention would be low or moderate risks. Component 3 consists of provision of orientation classes, psychosocial support and job placement referral for returnee migrants who have returned due to COVID-19 pandemic. The environment risks are low given Component 3 interventions and the social risks will hover between low to moderate, exclusion being the major issue.

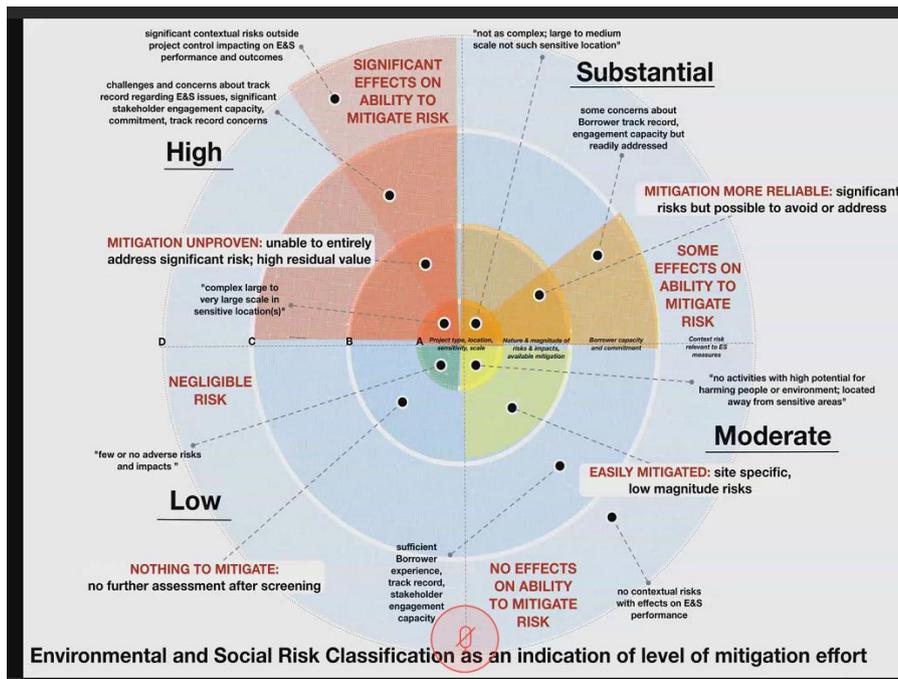


Figure: Environmental and Social Risk Classifications

Monitoring and Evaluation (M&E) Measures

6. M&E will be an integral part of the project under the responsibility of the PMU. WEWB will be responsible for managing a common web-based platform, which will be developed to track the project's progress based on the results framework. The platform will support a participatory M&E, which will allow project stakeholders—such as the MEWOE, NGOs, local Welfare Offices, WEWB officials, and consultants—to collect data on project progress. Collected data will include geospatial data with photographs of the outputs, along with the information on beneficiaries, to further analyze and verify the project outputs. WEWB will deploy a number of Independent Verification Consultants (IVCs) for monitoring and verifying project outputs and carry out independent environmental, social, health and safety audit to propose corrective measures. WEWB will also report quarterly on updated implementation schedules; commitment and disbursement, recommendations, agreements reached on key implementation issues.
7. The quarterly progress report will be submitted by WEWB to the Bank and MEWOE. In addition, the Bank, MEWOE and other stakeholders will carry out annual progress reviews, a mid-term review (MTR) of project performance about half way after project effectiveness and an end term review. In preparation for the reports, WEWB will carry out their own review of the project progress and implementation performance and draft proposals for immediate and/or longer-term remedies of issues, if needed. An independent impact assessment will be conducted to examine the correlation between project activities and human capital outcomes.

Environmental and Social Instruments

8. Various ES instruments have been prepared in line with ESF requirements as under:

Stakeholders Engagement Plan (SEP)

9. Stakeholders Engagement (SEP) has been prepared to define a program for stakeholder engagement, including public information disclosure and consultation, throughout project lifecycle.

The SEP outlines the ways in which various stakeholders will be identified and includes a mechanism by which they can raise concerns, provide feedback, or make positive and negative complaints about the project activities. This will begin very early in the project cycle and will be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format, in relevant local languages and is understandable to stakeholders.

Labor management Procedure (LMP)

10. A Labour Management Procedure (LMP) for the Project has been prepared to meet the objectives and requirements of ESS 2 and ESS 4 as well as the national Labor Law. The LMP assesses the potential risks and impacts of assignment of labor for the implementation of the Project activities by the IA and addresses them through mitigation measures in light of ESS and Labor policies and provisions.

Environmental and Social Commitment Plan (ESCP)

11. The IA has developed the ESCP, which sets out measures and actions required for the project to achieve compliance with the ESSs over a specified timeframe and is a commitment measure from the Borrower's side. The ESCP takes into account the findings of the ES assessment and the results of engagement with stakeholders. It is an accurate summary of the material measures and actions required to avoid, minimize, reduce or otherwise mitigate the potential ES risks and impacts of the project.

Budget Estimates for ESMP Implementation

12. Cost of implementing ES assessment and management plan including monitoring activities needs to be estimated as a part of the preparation of ESMP. Many of the activities to be carried out as a part of ESMP (suggested contents at Annex C) would not involve any additional direct cost e.g., keeping vehicles in good operating condition; scheduling deliveries; good housekeeping, etc. On the other hand, a number of activities would require additional cost like training, monitoring, budget for Consultants, etc. Cost estimates are prepared for all the mitigation and monitoring measures proposed in the ESMF. The cost estimates for some of the mitigation measures will be identified in the ESMP. The table below provides an estimate which is not exhaustive. Final budget will be prepared when specific design will be available.

Table 4: Tentative Cost Estimates for ESMP

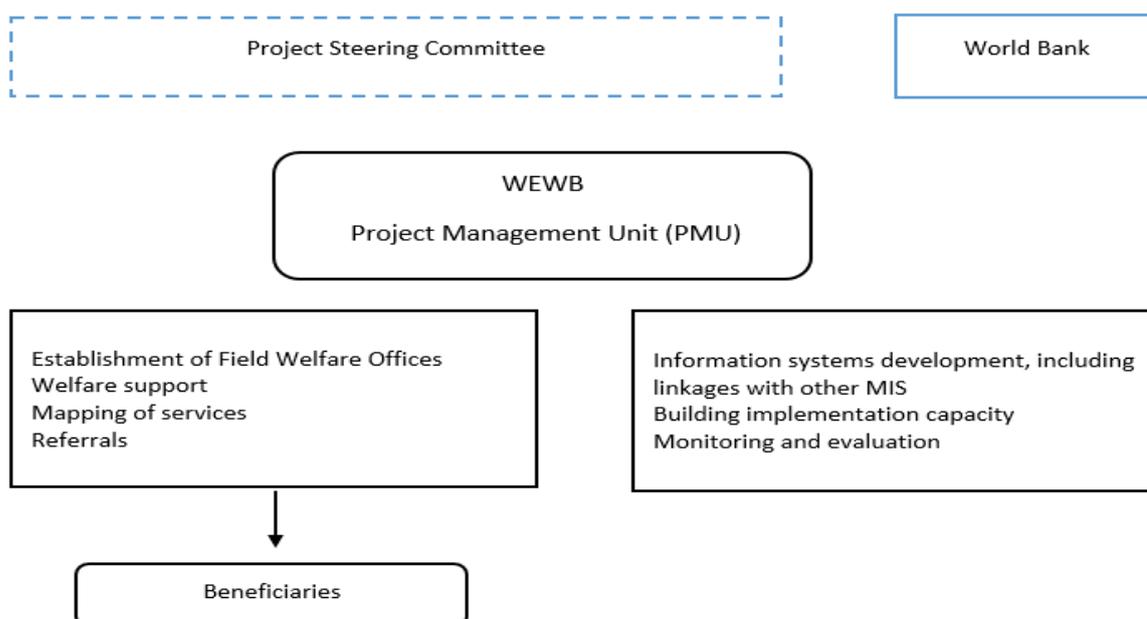
Activities	Amount (USD) Estimate
Budget for One ES Consultants @\$2000/month for three years	72,000
Implementation of SEP	95,000
Monitoring and Evaluation of ESMP	10,000
Training Requirements	30,000
TOTAL	210,000 (rounded)

The Development Project Proposal (DPP) of the Project should reflect the above activities with budget for successful ES management of the project.

INSTITUTIONAL FRAMEWORK AND CAPACITY ASSESSMENT

Institutional Framework and Roles in Project Implementation

1. The Palli Karma-Sahayak Foundation (PKSF) and the Wage Earners' Welfare Board (WEWB) under the Ministry of Expatriate Welfare and Overseas Employment (MEWOE) will be the implementing agencies for the Project. PKSF will be responsible for Component 1,2 and 4.1 and WEWB for Component 3 and 4.2.
2. WEWB would be responsible for registering and tracking returning migrants through the Return Migrants Registry. With the operationalization of the upgraded information system, it will have the ability to identify and match returning migrants with other services that MOEWOE may be able to offer them, such as through the Bureau of Manpower, Employment and Training (BMET) (for training), Prabashi Kalyan Bank (PKB) (for access to finance), or Bangladesh Overseas Employment and Services Limited (BOESL) (for support in re-migrating). Through the project, WEWB will establish welfare offices at the district-level, co-located with the BMET District Employment and Manpower Offices (DEMOs) where welfare officers will be able to provide outreach, counseling, and case management to return migrants that want to take advantage of the reintegration program support.
3. Both PKSF and WEWB will establish independent Project Management Units, respectively headed by (i) a Project Coordinator reporting directly to PKSF senior management, including the Deputy Managing Director-1 and (ii) a Project Director, reporting directly to the Director General, WEWB. The PMUs would comprise Deputy Project Coordinator/Director, technical staff, fiduciary specialists who would be responsible for all financial management-related activities under the Project, and safeguards specialists to support, monitor and report on implementation of the Environmental and Social Commitment Plan (ESCP). Each implementing agency would be guided by a Steering Committee headed by the Secretary of the respective Ministries (FID in the case of PKSF and MOEWOE in the case of WEWB). Joint Steering Committee meetings between the two ministries (FID and MEWOE) will be held twice a year, or as required, to provide overall strategic guidance and facilitate inter-ministerial coordination. The implementation arrangements of WEWB is illustrated by Figure below:



Roles and Responsibilities of Key Entities

4. Roles and responsibilities of key organizations are listed in the following Table.

Table 5: Roles and Responsibilities of Various Entities

SN	Organization	Responsibility
1.	WEWB (Implementing Agency)	<p>Would ensure ES compliance of the project as per the ESCP and ES assessments</p> <p>Would review and clear all ES documents prepared by consultants</p> <p>Provide guidance to PMU for successful implementation of ESMP</p> <p>Review progress of ESMP implementation</p> <p>Co-ordinate with other agencies as and when required.</p>
2.	Project management Unit (PMU)	In order to effectively manage ES issues, the PMU will assign social and environmental specialist to oversee ESCP commitment as well as monitoring project progress in line with ES instruments. PMU will be overall responsible for monitoring, assessment and management of ES issues of the Project
3.	Project ES Consultant	<p>Be responsible to PD for respective ES issues including preparation of required ES instruments, monitoring and implementation of the same</p> <p>Responsible for monitoring ES activities and to ensure adequate implementation of the ESMP by contractor.</p> <p>Providing guidance to the PMU regarding any ES issues which may arise during Project implementation</p> <p>Closely monitor the sanitation and hygiene at the Welfare Offices, first aid facilities, accident monitoring, safety aspects, PPE usage and disposal, first aid box etc.</p> <p>Monitor that adequate safety trainings are being given to all, availability of emergency evacuation plan</p> <p>Monitor COVID-19 outbreak in the Welfare Offices and PMU and ensure implementation of COVID-19 protocol. Ensure anyone with symptoms is reported and oversee evacuation</p> <p>Recommend to the PMU to take punitive action in non-compliance of ESMP</p>
4.	Welfare Offices	<p>Ensure safety protocol and PPE usage and disposal</p> <p>Ensure staffs know about ES commitment plans</p> <p>Ensure report cases of GBV and other grievance issues</p>

Assessment of Capacity of Implementing Agency (MEWOE and WEWB)

5. MEWOE is responsible for ensuring the welfare of expatriate workers and enhancing overseas employment opportunities through increased labor market access for Bangladeshi workers and skills development of the workforce. The Ministry has demonstrated its capacity to manage the successful repatriation and reintegration of migrant workers through the Emergency Repatriation and Livelihood Restoration Project (P126623) in response to the Libyan civil war in 2011. The Ministry thus has experience in working in Project under previous safeguard policies, not ESF. The WEWB is a statutory body under the Ministry that was created by the Wage Earners Welfare Act 2018. The Act lays out the formation and work-plan of the Wage Earners' Welfare Board. WEWB has recently been setup and has no experience in any WB funded project.

Action Plan to Strengthen Staffing, Capacity, Systems and Implementation

6. Though the IA is new to World Bank Project implementation, the nature of intervention would not be very significant environmentally and the social risks can be mitigated with planning and implementation of ES instruments. An Environmental and Social Specialist has been recommended in the PMU for appointment. A number of capacity development training has also been planned in the ESCP for both the IAs:

Table 6: Capacity Development Support (Training)

CAPACITY DEVELOPMENT SUPPORT (TRAINING)			
Specify Training to be provided	Targeted Groups and Timeframe	Training Completed	Budget (USD)
WEWB PMU (with support of third-party resources <i>if</i> needed (independent experts, NGOs, etc)) will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts. This ESCP proposes a preliminary training plan covering the following topics. This plan will be adapted to meet needs during Project implementation.			
ESF. Training on ESF and the 10 ESSs—including preparation of ESMP by PMU	Personnel directly related with project at the IAs	Within 30 days of Project effectiveness	2,000
Issues Related to COVID-19 by PMU <ul style="list-style-type: none"> • Use and disposal of PPE (for all) • Working/training in COVID-19 environment (All workers and beneficiaries) • COVID-19 Infection Prevention and Control mechanism • Standard precautions for COVID-19 (social distancing etc) • Risk communication, prevention and community engagement (Administrative and operational personnel) • WHO and CDC guidelines on quarantine 	Officials of IAs, Trainers, Beneficiaries, Welfare Officers	Within 30 days of Project effectiveness and if needed quarterly thereafter	5,000

<p>Occupational Health and Safety Module organized by PMU</p> <ul style="list-style-type: none"> • Workplace risk management • Prevention of accidents at Welfare Offices • Health and safety rules • Preparedness and response to emergency situations 	<p>Officials of IAs, Trainers and Beneficiaries, Welfare Officers</p>	<p>Within 30 days of Project effectiveness and continue half yearly throughout the project</p>	<p>5,000</p>
<p>Labor and Working Conditions organized by PMU</p> <ul style="list-style-type: none"> • Terms and conditions of employment according to national working laws and regulations • Codes of Conduct • Worker's organizations • Child labor and minimum age employment rules 	<p>IAs Local officials, POs, Workshops/ Microenterprises, Welfare Officers</p>	<p>Within 30 days of Project effectiveness</p>	<p>2,000</p>
<p>Grievance Redress Mechanism Module, design and production of a training module addressing the following aspects organized by PMU:</p> <ul style="list-style-type: none"> • Registration and processing procedure • Grievance redress procedure • Documenting and processing grievances • Use of the procedure by different stakeholders 	<p>ES, SDS, HS, IAs' Officials , POs, Welfare Officers</p>	<p>Within 30 days of Project effectiveness and thereafter once every 12 months</p>	<p>5,000</p>
<p>GBV Risk Module</p> <p>Raising awareness and measures to prevent and mitigate GBV/SEAH risks. The topics and activities will be developed and included in the Project GRM by the PMU.</p>	<p>IAs Local officials, Trainers, Beneficiaries</p>	<p>Within 30 days of Project effectiveness and thereafter once every 12 months</p>	<p>5,000</p>
		<p>Total</p>	<p>25,000</p>

ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

A: IDENTIFY INTERVENTIONS

Category of Intervention	Name of the Interventions	Number of Beneficiaries

B: CHECKLIST FOR ENVIRONMENTAL AND SOCIAL SCREENING

Criteria	YES	NO	Remark
Will the activities adversely affect working conditions and health and safety of staffs, workers or potentially employ vulnerable categories of workers including women, child labour?	<input type="checkbox"/>	<input type="checkbox"/>	
Will activities and deployment of manpower cause potential GBV cases?	<input type="checkbox"/>	<input type="checkbox"/>	
Will the activities potentially generate PPE related wastes and contaminate lands that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	<input type="checkbox"/>	<input type="checkbox"/>	
Will the activities cause interaction between staffs, beneficiaries and communities in view of COVID-19 situation?	<input type="checkbox"/>	<input type="checkbox"/>	
Will the intervention likely cause disadvantaged migrants (women, people with disability etc) be excluded from consultation and participation in project activities and benefits?	<input type="checkbox"/>	<input type="checkbox"/>	
Is there any possibilities for exclusion basing on beneficiaries' location, background, network?	<input type="checkbox"/>	<input type="checkbox"/>	
Will any activity cause negative impact on biodiversity and cultural heritages?	<input type="checkbox"/>	<input type="checkbox"/>	
Will everyone, meeting the criteria of the employment, have equal opportunity for employment under the project?	<input type="checkbox"/>	<input type="checkbox"/>	
Is there any facilities to refer to in case project related interactions cause COVID-19 symptoms/ diseases/ virus spread?	<input type="checkbox"/>	<input type="checkbox"/>	

SOCIAL IMPACT ASSESSMENT SCREENING DATA SHEET

1. **Location:**
2. **Activities.** Description of the activities/ interventions that will be implemented under the project.
3. **Demography.** Status of female migrants, migrants living below poverty, undereducated migrants, migrants with disability. Male/female migrant ratio, occupation and skills. Public safety and security concern, if any. People at the community leadership.
4. **Labor/Manpower.** Type and number of labor/manpower/staffs employed—PMU and Welfare Office wise.
5. **Status of COVID-19 pandemic near Welfare Offices.** Usage of PPE, social distancing, training/ knowledge. Infected cases. Recent visitors from abroad. Availability of medical assistance. Provision of information dissemination (TV, Radio, Internet, newspaper etc)
6. **Number of approximate migrant families and migrants, Welfare Office wise**
7. **Stakeholder Engagement.** Any communication and engagement carried out or not? Do people know the existence of GRM? Are they aware of any risk, impacts on them due to project intervention? Are they aware of the project components, provision for migrants and benefits etc?

SAMPLE ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Project Stage		Potential Environmental & Social Impacts/Issues	Proposed Mitigation Measures	Institutional Responsibilities	Supervision Responsibility
Project Stage	Preparation	Stakeholders Engagement	<ul style="list-style-type: none"> All the project stakeholders will be consulted Separate community level consultation meeting with HHS that has returnee migrants All the ES documents will be disclosed to all the relevant stakeholders All the stakeholders will be informed about the GRM 	PMU/ IA	Environmental and Social Specialist of PMU
Project Stage	Preparation	Selection of Beneficiary Migrants	<ul style="list-style-type: none"> Any return migrant worker that has returned to Bangladesh since February 2020 will be eligible. Eligibility verification: <ul style="list-style-type: none"> Return migrants that have been registered by the systems developed under the GoB repatriation program, or registered into the returnee database will have their recent return status automatically verified. Return migrants that are not included in the database or systems (such as due to coming back before the systems were online, or on their own resources) will need to provide proof of their last return, such as their contract, re-entry documentation from Bangladesh SB during immigration, and/or flight details. Return migrants would be informed about the program during their re-entry into Bangladesh, and/or through social mobilization, and public communication campaigns in high migration districts. 	PMU/ IA	Environmental and Social Specialist of PMU
Project Stage	Preparation	Selection of Welfare Offices near DEMO (District Employment and Manpower Offices)	<ul style="list-style-type: none"> Selection of Welfare Offices should be done so as to allow social distancing measures if face to face interaction is necessary Adequate disposal measure of PPE should be present 	PMU	Environmental and Social Specialist of PMU
Project Stage	Implementation	Safety Issues	<ul style="list-style-type: none"> Prevent entry of unauthorized personnel Health and safety training to the staffs All staffs to wear ID cards COVID-19 measures like PPE usage, sanitizers and temperature 	PMU	Environmental and Social Specialist of PMU,

		<p>check to be in place</p> <ul style="list-style-type: none"> • Disposal of PPE should be done as per protocol • Nearby health facilities to be communicated beforehand for maintaining liaison in case required in emergency 		Senior Welfare Officer
Project Implementation Stage	Stakeholders Engagement	<ul style="list-style-type: none"> • Publication of GRM in the Welfare Office Boards • Adequate space for stakeholder meeting keeping in view COVID-19 protocols • An information kiosk/ point of contact in each Welfare Office to receive suggestions and complaints • Provision of Complaints Box and registers 	PMU	Environmental and Social Specialist of PMU, Senior Welfare Officer
Project Implementation Stage	Labour Issues	<ul style="list-style-type: none"> • Awareness building about prevention of child abuse, child marriage, GBV, sexual harassment, trafficking of women and children as well as illegal drug trade • Work force should be prohibited from disturbing the environment • Adequate facilities ensuring COVID-19 protocols (PPE etc) • Treated water will be made available at Welfare Offices for drinking purpose. • Adequate training on COVID-19 issues • Evacuation facilities for symptomatic staffs 	PMU	Environmental and Social Specialist of PMU, Senior Welfare Officer