

Public Disclosure Authorized

Environmental and Social Commitment Plan For Gas Sector Efficiency Improvement and Carbon Abatement Project

Project ID no: 179009

Prepared by:

Titas Gas Transmission and Distribution Company Limited (TGTDCCL)
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&
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(Negotiated Version)

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. People's Republic of Bangladesh (GoB) (the **Borrower**) will implement the Gas Sector Efficiency Improvement and Carbon Abatement Project (the **Project**), with the involvement of the implementing agencies; Titas Gas Transmission and Distribution Company Limited (TGTDCL) and Pashchimanchal Gas Company Limited (PGCL) under Ministry of Power, Energy and Mineral Resource (MoPEMR), Energy and Mineral Resources Division (EMRD) and Bangladesh Oil, Gas & Mineral Corporation (Petrobangla), respectively, as set out in the Financing Agreement and the Project Agreement. The International Development Association (the Association) has agreed to provide financing for the Project as set out in the referred agreements.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower through TGTDCL and/or PGCL, as the case maybe, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the designated official of TGTDCL and/or PGCL, as the case maybe. The Borrower, through TGTDCL and/or PGCL, as the case maybe, shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBILITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP and status of preparation and implementation of ES documents required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism.</p>	Every six months during the Project's implementation.	TGTDCL, PGCL (Implementing Agencies) will submit separately as relevant.
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including accidents that could result in fatalities, injuries, cases of GBV/SEA/SH, concerns of COVID-19 infections, serious mismanagement in handling waste, security breach, etc.. Provide sufficient details regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate.</p> <p>Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Initially notify the Association within 24 hours of learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association as per the Association's new Environment and Social Incident Response Toolkit (ESIRT).</p>	TGTDCL, PGCL
C.	<p>CONTRACTORS REPORTS</p> <p>Prepare and submit monthly reports based on the contractors' monthly reports.</p> <p>Details will include status on:</p> <ol style="list-style-type: none"> Contractor's implementation workplan following the ESCoP Status on actions indicated in the Labor Management Procedure ESHS incidents & supervision 	Monthly throughout project implementation to PIU, and require contractors to provide monthly reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.	TGTDCL and PGCL through Contractor.

	<p>4. Usage of Personal Protective Equipment (PPE) such as hard hats, safety shoes and safety vests by workers</p> <p>5. Safety at work sites like providing traffic signage, barriers/delineator, management of traffic, drainage and pliable road surface etc.</p> <p>6. Training conducted, and worker's participation</p> <p>7. Functioning of GRM relating to labor aspects, including summary details of Workers grievances or any Grievances related to contractor's work.</p>		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Each Implementing Agency (PGCL, TGTDCCL) will have one Environmental and Social Specialist (E&S). The Specialists must have experience working on Gender, GBV and related issues. The E&S Specialist at each IA will be responsible for implementing the SEP, LMP and ESCoP.</p>	Recruitment process will be completed within three months of project effectiveness, and the inhouse capacity with the help of internal ES focal of each IA will support during the interim period.	TGTDCCL, PGCL
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>a. Screening the environmental and social risks and impacts including SEA/SH risks of prior to installation of each prepaid meter, in accordance with the ESCOP Guidelines for the proposed project.</p> <p>b. Adopt and implement the ESCOP, consistent with the relevant ESSs and other relevant Good International Industry Practice (GIIP) including relevant WHO Guidelines on COVID-19 response.</p> <p>c.</p>	<ul style="list-style-type: none"> Adopt the ESCOP before appraisal, and thereafter implement the ESCOP throughout the Project implementation. 	TGTDCCL, PGCL
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, ESCoP and the LMP, into the</p>		TGTDCCL,PGCL

	Environmental, Social, Health and Safety (ESHS) specifications of the respective procurement documents with contractors. Thereafter, ensure that the contractors comply with the ESHS specifications of their respective contracts.	During Bid document preparation	
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including the development of the Action Plan for Decarbonization), capacity building, training, and any other technical assistance activities under the Project, including the development of the Action Plan for Decarbonization, and any associated environmental and social assessments and instruments to be prepared for the Action Plan under the TA, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation.	TGTDCL, PGCL
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT Procedures: Each IA will adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on adequate OHS measures (including COVID-19 response measures, as also contained in ESCOP, action 1.2 above), provision of training on handling emergency situation especially health related issues and accidents, provision of Code of Conduct signing and GBV/SEA/SH training by all workers; and setting out grievance arrangements for project workers, and incorporating labor requirements in the procurement documents and contracts with contractors and consultants. Ensure that child labor (any person under the age of 18), forced labor and trafficked persons are not employed under works contracts.	Adopt the LMPs prior to appraisal, and therefore implement the LMPs throughout Project implementation. TGTDCL and PGCL have prepared separate LMPs.	TGTDCL,PGCL

2.2	<p>GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a Grievance Redress Mechanism (GRM) for Project workers, as described in the LMP and consistent with ESS2. The GRM should also be designed to address labor related GBV/SEA/SH issues including provision of a referral system.</p>	GRM for the workers will be established before commencement of Project activities and it will remain operational throughout Project implementation.	TGTDCL,PGCL
2.3			

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT

3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Prepare and implement a Waste Management Plan (WMP), consistent with ESS3 and as specified in the ESCOP (action 1.2 above), as necessary, including resource efficiency and pollution prevention and management measures</p>	Prior to Project activities that would require such plan, and thereafter implement throughout the implementation of such activities	TGTDCL,PGCL ;
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ESS 4: COMMUNITY HEALTH AND SAFETY

4.1	<p>Adopt and implement measures to prevent or minimize the spread of the infectious diseases/COVID-19 to the community and among workers/labor camps by following national and WHO guidelines of social distancing and other measures, as specified in the ESCOP (action 1.2 above), as necessary.</p> <p>Adopt and implement measures and actions to assess and manage traffic and community safety risks, as specified in the ESCOP (action 1.2 above), as necessary</p>	Prior to Project activities that would require such measures, and thereafter implement throughout the implementation of such activities	TGTDCL,PGCL;
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	Ensure the avoidance of all forms of Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA) by establishing written Codes of Conduct for all workers in the project area as well as train and sensitize them on this issue, as specified in the ESCOP (action 1.2 above). The IA has already prepared SEP and will adopt and implement a Project Grievance Redress Mechanism (GRM) under SEP as well as a labor related GRM under LMP to handle any GBV/SEA related grievances		
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ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS: Not Applicable	Not Applicable	Not Applicable
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS: Not Applicable	Not Applicable	Not Applicable
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLAN: Not Applicable	Not Applicable	Not Applicable.
ESS 8: CULTURAL HERITAGE			
8.1	It is very unlikely, however as precautionary measure, the ESCoP will have a specific section on Chance Find Procedures, and ensure that if meters are installed in protected sections of the city, homes / buildings of historical/ cultural value, these activities will comply with applicable GIIP and local ordinances/regulations.	ESCOP to be adopted and implemented in the timeline specified in action 1.2 above.	TGTDC,PGCL

ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not Applicable	Not Applicable	Not Applicable
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and Implement the SEPs by each of the IAs.</p> <p>PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain, and operate a grievance mechanism, as described in the SEP.</p>	<p>Adopt the SEPs prior to appraisal and thereafter implement the SEPs throughout the Project implementation.</p> <p>Project level GRC will be formed within three months of the project effectiveness and till then IAs existing GRM (for the organization) will record all the grievances.</p>	TGTDCL,PGCL
10.2			
CAPACITY DEVELOPMENT SUPPORT (TRAINING)			
Specify Training to be provided		Targeted Groups and Timeframe	Training Completed
<p>All staff of the PIUs, Contractors and Operators of facilities (premises of installation of meters/SCADA) will be given capacity building training and orientation on environmental, social, health and safety (ESHS) management following the national legal and policy requirements, international treaties, WHO guidelines and the World Bank ESF, with support of PIU E&S specialists. PIUs 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 that can be adapted to meet needs during Project implementation according to the approved training plan and budget by the Association.</p>			

<p>ESF. Training on ESF and the 10 ESSs—including preparation of the specific instruments applicable for the project and the ESIRT</p>	<p>throughout the Project implementation period.</p>	<p>E&S specialist of the PIUs will deliver the training with the assistance of WB staff</p>
<p>Occupational Health and Safety Module:</p> <ul style="list-style-type: none"> • GBV/SEA/SHA • Workplace risk management • Prevention of accidents at work sites • Occupational, health and safety rules • Preparedness and response to emergency situations 		
<p>Community Health and Safety Module</p> <ul style="list-style-type: none"> • Community health and safety rules • Project workers health • Accidents to be avoided • Handling of gas leakage, safety measure • Measures to stop the spread of COVID-19 		
<p>Labor and Working Conditions</p> <ul style="list-style-type: none"> • Terms and conditions of employment according to national working laws and regulations • Labor code of conduct • Contractor and sub-contractor Codes of Conduct • Worker’s organizations • Child labor and minimum age employment rules, forced labor 		
<p>Grievance Redress Mechanism Module, design and production of a training module addressing the following aspects:</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>GBV Risk Module Raising awareness and measures to prevent and mitigate GBV/SEAH risks. The topics and activities will be developed and included in the Project GRM.</p>		
<p>Waste Management</p>		

<p>Contractors to be appointed by Titas and PGCL will be trained for safe removal of waste materials produced during installation and minor works of the project.</p>		
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