

Environmental Assessment and Review Framework

DRAFT

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BAN: MFF Skills for Employment Investment Program (SEIP)

Prepared by the Finance Division under the Ministry of Finance for the Asian Development Bank.

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CURRENCY EQUIVALENTS

(as of 15 December 2013)

Currency unit	–	taka (Tk)
Tk1.00	=	\$0.01289
\$1.00	=	Tk77.5705

ABBREVIATIONS

ADB	–	Asian Development Bank
BITAC	–	Bangladesh Industrial Technical Assistance Centre
BTEB	–	Bangladesh Technical Education Board
DoE	–	Department of Environment
DTE	–	Directorate of Technical Education
ISC	–	industry skills council
MoSD	–	Ministry of Skill Development
NSDC	–	National Skill Development Council
NSDP	–	National Skill Development Policy
NTVQF	–	National Technical Vocational Qualification Framework

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EXECUTIVE SUMMARY

1. This Report on Environmental Assessment and Review Framework (EARF) is based on the documented activities of Bangladesh Skills for Employment Investment Program (SEIP) and the impacts anticipated upon the environment from such activities. The findings and conclusions of this IEE report are based on an analysis of the information collected through literature surveys, meetings and consultations with various personnel connected with SEIP and data collected through secondary sources such as the Department of Environment (DoE), Forest Department, Bangladesh Bureau of Statistics, and relevant project documentation received from relevant ministries and line agencies of the Government.

2. Type of activity, location and type of work involved and size as well as severity of pollution loads due to activities during preparatory and operational stages make SEIP put under DoE Orange B and ADB's B categories. Accordingly a respective type of IEE is required to be prepared for DoE and environmental implications on the project will be reviewed for ADB. The environmental implication will be reviewed to ensure that the potential adverse environmental impacts are appropriately addressed in line with ADB's Safeguard policy Statement (2009). Most of the project impacts would be localized due to the relatively small-scale activities and could be addressed with proper mitigation measures, adopting adequate occupational health and safety measures and good housekeeping practices.

3. SEIP has been the outcome of a felt need focused both in job focused skills and also in up-skilling of existing workforce in a way that could ensure the quality of training, improvement in worker productivity and human ware matching the standards, both at home (in respect of meeting international standards for skills and fruitful utilization of skilled workforce) and also abroad (in respect of export of manpower with required skills skilled services). The Government of Bangladesh has drawn up SEIP towards skilling of the new entrants and up-skilling of the existing workforce in various occupations.. The Program also designed to provide for market responsive inclusive skills training activities among the existing training providers in the country and also implement different reform agenda for strengthening of the TVET sector. Moreover, SEIP will also impart training on occupational health and safety (OSH) and compliance module with all technical skills modules to the beneficiaries of the program. While pursuing assigned skill enhancement activities, SEIP also envisages engaging in the process, through the apex policy making body, the National Skills Development Council (NSDC), various local industry associations and internationally recognized employer associations with substantial membership coverage of priority economic sectors and formally recognized by the government.

4. Implementation of SEIP is to be governed by the national laws and laws concerning environment, the Environment Conservation Act, 1995 (ECA, '95) and the Environment Conservation Rules, 1997 (ECR, '97). ECR, '97 sets forth standards for various environmental parameters. Implementation of SEIP will also to be guided by ADB's Safeguard Policy Statement (2009) and Operational Manual F1 (2010). Compliance is required in all stages of SEIP implementation.

5. Toward achieving the desired goal, SEIP has selected the following 6 (six) priority for training program under Tranche 1 and has adopted a demand driven approach with effective inputs from Industry Skills Councils (ISCs), Employer Associations and Employers. These six priority sectors targeted initially by SEIP in Tranche 1 are:

- i. Readymade Garments (RMG) & Textile
- ii. Construction;
- iii. Information and Communication Technology (ICT);

- iv. Light Engineering/Manufacturing;
- v. Leather and Footwear; and
- vi. Maritime

6. Training activities of SEIP will be conducted at 32 selected public training institutes at 32 locations in various districts throughout Bangladesh that are well connected by road, rail and air. Moreover, training programs of the identified industry associations will be conducted in 25 training centers and up-skilling training will be conducted in the member factories.

7. No new building or construction will be done under tranche 1 of SEIP. Rather, existing facilities, with minor adjustment or renovations to cater to the need of the training activities, both at public and private sector enterprises will be utilized. SEIP will finance skills training of 260,000 trainees with at least 70% job placement (182,000) during tranche 1 and a total training of 1.25 million (.875 million job placements) during the project period (2014-2021).

8. Five types of organizations are expected to deliver these training targets with at least 70% job placements. These are:

- a) Public training providers. 9 Technical School and Colleges (TSCs) under the Directorate of Technical Education (DTE), 20 Technical Training Centers (TTCs) under the Bureau of Manpower, Employment and Training (BMET), and 3 Bangladesh Industrial Technical Assistance Centers (BITAC) under the Ministry of Industry. Around 47,400 training target is proposed through 32 public training providers.
- b) Palli Karma Sahayak Foundation (PKSF). Around 10,000 training target is proposed through nongovernment organizations which are already PKSF partners in imparting livelihood programs and related training linked to gainful employment or self-employment. PKSF is uniquely placed to link skills training through its well established partnership arrangements with some of the most effective NGOs in Bangladesh.
- c) Bangladesh Bank. Around 10,000 training target is proposed through the Bangladesh Bank (BB), Small and Medium Enterprise (SME) Department linked with its SME support program. Government and ADB already have good experience working with the Bangladesh Bank in implementing the SME project through selected commercial banks.
- d) Industry Associations. Around 190,000 training target (new entrants and up-skilling) is proposed through 8 industry associations [Bangladesh Garment Manufacturing and Exporters Association (BGMEA), Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA), Bangladesh Textile Mills Association (BTMA), Leather and Footwear, Bangladesh Association of Construction Industry (BACI), Bangladesh Engineering Industry Owners' Association (BEIOA), Bangladesh Association of Call Centers Operators(BACCO) and Maritime Institutes Association] in 6 priority sectors.
- e) Private training providers. It is proposed to engage 10-15 proven private training providers initially to complement some of the training targets noted above based on a set of agreed selection criteria and process.

9. Training program will be developed and prioritized according to ISC and Industry Association identified skills needs. Priorities which will be updated annually in the form of a published Industry Training Plan. SEIP will maintain the quality and relevance of the training packages developed with ISCs through development and implementation of training programs that require structured industrial attachment (on the job training) with learning in the workplace

directly relevant to the competencies being acquired in new skills programs developed with industry. Courses will be either on job-focused packages of skill competencies based on CBT standards (approved by ISCs) or existing BTEB approved modular courses. Once CBT courses with associated elements such as, packages of skill competencies, certified CBT teachers, industry assessors, registered training organizations (RTO) with BTEB aligned to industry endorsed standards are complete, institutions will deliver CBT courses by replacing or updating existing courses.

10. Although it is not categorically spelled out in the project design of SEIP, it is indicated that some sort of minor repair, renovation and restoration might be necessary in the existing workshops and buildings of the public training institutions. Overall improvement of environmental management of some of the training-site buildings in terms of appropriate drainage, handling and disposal of sanitary and solid waste might also be required to cater to the need of the prospective trainees.

11. SEIP will also make positive contributions to the local environment specific to the selected training sites by developing healthy and safer environment to the premises housing sites with natural light and well ventilated classrooms, structures resilient to environmental extremes (including climate variability, such as, severe storms and, in some cases, geophysical hazards like earthquakes and landslides), improve hygiene among trainees, and provide support for supplying clean drinking water and good sanitation facilities.

12. The program is not expected to have significant or irreversible negative environmental impacts neither at the operation, nor at the preparatory phases. Impacts of the construction phase will be typical for all medium-scale renovation/repair and maintenance activities and limited to the program sites. Impacts of the operation phase will be typical for small civil works. The program anticipated environmental impacts although very limited may include drainage congestion/water logging, minor dust pollution, minor water and noise pollution, occupational health hazards due to improper management of construction materials and solid and hazardous waste from civil works, risk from poor sanitation system, improper ventilation system in training rooms, etc. Program related environmental impact could be minimized by adopting appropriate mitigation measures. However, the impacts on natural disasters and other extreme climate events could be reduced by adopting appropriate preparedness and precautionary measure. This document is thus prepared to establish the mechanism to determine and assess future potential environmental impacts of civil works that are to be identified and cleared based on a participatory demand-driven process, and to set out required mitigation, monitoring, and institutional measures to be taken during implementation and operation to eliminate adverse environmental impacts, or to reduce them to acceptable limits.

13. Implementation of mitigation measures will be ensured through both routine and periodic monitoring measures. Adequate monitoring activities for SEIP will be adopted. SEIP will not cause any significant adverse environmental and social impacts during repair or renovation phase. Rather, the positive impacts due to SEIP operations will more than outweigh the insignificant negative impacts.

I. INTRODUCTION

A. Background

1. The Bangladesh Skills for Employment Investment Program (SEIP) has been drawn up by the Government of Bangladesh toward skill improvement among the technical workforce of various occupations. SEIP envisages improvement of job focused skills and up-skilling of the existing workforce toward ensuring availability of 'required skills to industry standards'. The Program has been designed to provide for market responsive inclusive skills training activities among the selected training providers in the country. These training providers will thus be able to work with industry and help facilitate industry growth and increased employment of skilled workforce. While pursuing its assigned skill enhancement activities, SEIP also envisages engaging in the process, through the apex policy making body, the National Skills Development Council (NSDC), various local industry associations and internationally recognized employer associations with substantial membership coverage of priority economic sectors and formally recognized by the government.

B. Need of SEIP

2. Over the years, there has been a felt need among both public and private sector agencies in Bangladesh of ensuring availability of optimally required skilled workforce belonging to various vocational strata toward meeting relevant demand both at home and at locations beyond the national boundaries. Such a need had been focused both in job focused skills and also in up-skilling of existing workforce in a way that could ensure both products and humanware matching the standards both at home (in respect of consumption of products of world standards and fruitful utilization of skilled workforce) and also abroad (in respect of export of goods and skilled services).

C. Objectives of SEIP

3. SEIP, over a period of 10 years, is to cover at least 15 priority sectors out of which 6 (six) sectors have been selected for training program under Tranche 1. SEIP has also adopted a demand driven approach with effective inputs from Industry Skills Councils (ISCs), Employer Associations and Employers. These six priority sectors targeted initially by SEIP in Tranche 1 are:

- i. Readymade Garments (RMG);& Textile
- ii. Construction;
- iii. Information and Communication Technology (IT);
- iv. Light Engineering/Manufacturing;
- v. Leather and Footwear; and
- vi. Maritime

D. Purpose of the EARF

4. The Finance Division under the Ministry of Finance, in consultation with relevant stakeholders, has prepared this Environmental Assessment and Review Framework (EARF) to support the implementing agency to deal with potential environmental issues that may arise during implementation of the various civil works and project components/"subprojects". The purpose of this EARF is to ensure that both the infrastructure, both in terms of needs and quality

at neither secondary schools, nor the environment is compromised through the program intervention. The specific objectives of EARF is to specify appropriate roles and responsibilities to carryout environmental screening, mitigation measure, monitoring and reporting related to implementation of project components/"subprojects" and to avoid potential adverse environmental impacts and enhance environmental outcomes of the activities implemented under project components or "subprojects".

5. This EARF provides general policies, guidelines, and procedures to be integrated into the implementation of all infrastructures under the Program. In preparing this document, relevant environmental safeguard practices, compliance, and past experience in the sector were reviewed. The review also included consultations with the associated stakeholders; qualitative and quantitative assessments of environmental safeguard compliance processes in the DOE; capacity assessment of the implementing agency; and information on the capacity of their field level staff. This EARF is intended to be used as a practical tool during renovation/repair and maintenance of training institutes or minor civil works planning, design, implementation, and monitoring. The Framework describes the steps involved in identifying and mitigating the potential adverse environmental impacts from minor civil works implementation activities, EARF ensures protection of health and hygiene of trainee, environmental sustainability, and welfare of affected stakeholders. The EARF outlines environmental screening procedures, assessment methodologies, environmental management (mitigation, monitoring and documentation), and reporting for the components of the Project; and to specify institutional structure and mechanism to carryout compliance to environmental management plan.

E. Methodology and Approach for Environmental Assessment

6. The following activities will be undertaken for the purpose of conducting environmental assessment:

- i. Desk review of information such as maps, reports, etc. for the project. Preparation of checklist for collecting project related information;
- ii. Review of national policy, laws/regulations and procedures relating to environment, health and safety, resettlement and rehabilitation, etc.;
- iii. Focusing on the environmental baselines on which SEIP is to operate;
- iv. Prediction of environmental impacts to be generated from SEIP preparatory activities and proposing mitigation measures;
- v. Taking into account the benefits or positive impacts of SEIP operations and proposing benefit enhancement measures;

7. **Environment Assessment Methods:** An outline of the activities for conducting IEE study is presented below:

- i. **Desk Study:** Review of information such as maps, reports, and EARF for the Project. Checklist for collecting site information is also finalized.
- ii. **Consultations:** Major stakeholders shall be consulted by means of Focus Group Discussions (FGD). If required, discussion with concerned government offices (Department of Environment; Construction contractors; Administrative and relevant department of training institutes; etc.) will also be undertaken.
- iii. **Field Assessment:** Assessment of the potential and significant environmental concerns shall be done to collect data and analyze any potential impacts.
- iv. **Sampling and Testing:** Special tests may be necessary in certain cases where water pollution issues need to be investigated (water quality for arsenic or

fluoride content, water quality for iron, salinity, etc. and noise level, PM 10/PM12 in air).

- v. **Consideration of Alternatives:** The environmental implications of different alternatives will be briefly assessed, particularly focusing on location of infrastructure, renovation, design and orientation, method of construction, source of construction materials, and schedule of construction).
- vi. **Identification of Environmental Impacts and Mitigation Measures:** The impacts will be identified in terms of their significance, extent, reversibility, and duration.
- vii. **Design of Environmental Monitoring Plan:** The IEE shall propose EMP where monitoring requirements for potential environmental impacts are identified, mitigation measures prepared, method of mitigation measure developed, indicators suggested, frequency of undertaking monitoring activity decided, cost estimated, and responsible agency for undertaking the monitoring identified.
- viii. **IEE Report:** IEE report shall be prepared in brief following the template presented in Annex 2.

8. Implementation of SEIP is to be governed by the national laws and laws concerning environment, the Environment Conservation Act, 1995 (ECA, '95) and the Environment Conservation Rules, 1997 (ECR, '97). ECR, '97 sets forth standards for various environmental parameters. Implementation of SEIP will also to be guided by ADB's Safeguard Policy Statement (2009) and Operational Manual F1 (2010). Compliance is required in all stages of SEIP implementation.

II. POLICIES, LEGAL AND INSTITUTIONAL FRAMEWORK

A. Overview

9. The Ministry of Environment and Forest, particularly, the Department of Environment (DoE), of the Government of the People's Republic of Bangladesh (GoB), has the overall responsibility of setting standards for the various parameters of the country's environment. ECR, '97 addresses, inter alia, standards for air, noise, and water quality, and the requirements for preparing applicable environmental assessment statements for development projects. These standards are of significance for the proposed project.

10. The implementation of the project will be governed by the sector-specific national laws (where applicable) and environmental rules, regulations, and standards. These regulations impose restrictions on activities to minimize/mitigate likely impacts on the environment. Compliance is required in all stages of the project's implementation including design, construction, repair and maintenance. This report has also considered ADB's Safeguards Policy Statement (SPS) 2009 requirements. Provided the project complies with the national and ADB SPS (2009) requirements, no significant adverse environmental implications are envisaged either during the preparatory stages or during implementation of the project activities.

11. Salient features of relevant GoB environmental laws and regulations and those of ADB Policies, including their applicability to this project is provided in the subsequent paragraphs.

B. Safeguard Requirements of the Government of Bangladesh

12. For the protection, conservation and management of the biophysical and social environment from damaging development pressures, the Government of Bangladesh has

developed a completed legal framework, including laws, regulations, decrees and standards addressing environmental and social safeguards. These are presently under review and draft materials are being circulated, but cannot be applied until they are promulgated. Of the existing documents, those most relevant to this subproject are summarized in this chapter.

13. **National Environmental Policy, 1992** - The Bangladesh National Environmental Policy, approved in May 1992, sets out the basic framework for environmental action together with a set of broad sectoral action guidelines. Key elements of the policy are:

- i. Maintaining ecological balance and ensuring sustainable development of the country through protection and conservation of the environment
- ii. Protecting the country from natural disasters
- iii. Identifying and regulating all activities that pollute and destroy the environment
- iv. Ensuring environment-friendly development in all sectors
- v. Ensuring sustainable and environmentally sound management of the natural resources
- vi. Maintaining active association, as far as possible, with all international initiatives related to environment

14. The policy seeks to ensure that transport systems, including roads and inland waterways, do not pollute the environment or degrade resources. The Policy states that Environmental Impact Assessments (EIAs) must be conducted before projects are undertaken.

15. **National Environmental Management Action Plan (NEMAP), 1995** - The National Environmental Management Action Plan (NEMAP) is a wide-ranging and multi-faceted plan which builds on and extends the statements set out in the National Environmental Policy. NEMAP was developed to address issues and management requirements during the period 1995 to 2005, and set out of the framework within which the recommendations of the National Environmental Policy were to be implemented. It identified four broad objectives and remains highly relevant today. The four key environmental management directions specified were:

- i. Identification of key environmental issues affecting Bangladesh;
- ii. Identification of actions necessary to halt or reduce the rate of environmental degradation of the natural environment;
- iii. Sustainable resource use and the conservation of habitats and biodiversity; and,
- iv. Improvement of the quality of life of the people.

16. **The Environment Conservation Act, 1995 (Amended in 2000 and 2002)** - The Act is applied by the Department of Environment, (DoE), within the Ministry of Environment and Forest. The Act forms the basis of the country's environmental safeguard system. It authorizes the Director General (DG) of DoE to undertake any activity deemed necessary to control, prevent and mitigate pollution and to conserve and enhance the quality of environment. It lays out the basic rules on damage to the ecosystem, discharge of wastes, and the agency's power to enter and collect samples as part of any investigation. The Act also defined the powers of DoE to prepare Rules in support of the Act.

17. **Environment Conservation Rules, 1997 (amended 2002 and 2003)**- The Environment Conservation Rules, 1997 are the first set of rules promulgated under the Environment Conservation Act, 1995. These Rules provide for, inter alia, the following:

- i. Procedures for planning and completion of EIAs, including the preparation of

Environmental Management plans, document format and content, as well as the and for the provision of environmental clearance;

- ii. National Environmental Quality Standards (EQS) for ambient air, surface water, groundwater, drinking water, industrial effluents, emissions, noise and vehicular exhaust;
- iii. A listing of industries, development projects and other activities. grouped into four environmental assessment categories on the basis of actual (for existing industries/development projects/activities) and anticipated (for proposed industries/development projects/activities) pollutant loading; and,
- iv. Procedure for damage-claim by persons affected or likely to be affected due to polluting activities or activities causing hindrance to normal civic life.

18. Depending on the industry, activity, project location, type of work, size and severity of pollution loads, DoE classified 186 activities into four environmental assessment categories. These are Green for work that does not require any environmental assessment, Orange A and Orange B that require Initial Environmental Examination (IEE) and Red, requiring full environmental assessment.

19. In addition to the Environmental Conservation Act and Rules, there are a number of other policies, plans and strategies which are relevant to this Project. These are the Environment Court Act (2010), National Policy for Safe Water Supply and Sanitation (1998), National Policy for Arsenic Mitigation (2004), National Sanitation Strategy (2005), Coastal Zone Policy (2005), Coastal Development Strategy (2006), National Agricultural Policy (1999), Standing Orders on Disaster (1999) (revised in 2010), National Plan for Disaster Management (2010-2015), Solid Waste Management Rules (2010), Noise Pollution (Control) Rules (2006), etc. The Bangladesh National Building Code (2006) and Bangladesh Labor Act (2006) are also important with regards the occupational health and safety of workers and laborers to be involved in the Project.

20. The National Building Code (2006) and National Labor Act (2006) have defined certain measures to ensure proper safety and work environment as well as the compensation measures to the laborers. By national law, in order to be compensated, contractors must follow and comply with these safety provisions and compensation arrangements. The implementing agency must ensure that the appropriate occupational health and safety provisions have been included in the bidding documents and are being implemented by contractor. Many training centers in disaster prone areas are also used as cyclone/disaster shelters for the community. Therefore conducting training during cyclone season and disasters should be avoided. As per the Safe Drinking Water Supply and Sanitation Policy (1998), provision for arsenic, salinity and iron safe drinking water, and adequate sanitation facilities will have to be ensured for training center. The water quality and sanitation facilities need to be monitored periodically to ensure that the supplied water is safe for drinking and sanitation facilities are good.

C. Safeguard Requirements of ADB

21. All projects funded by ADB must comply with the ADB's SPS (2009) and Operational Manual F1 (2010). The purpose of the SPS is to establish an environmental review process to ensure that projects undertaken as part of programs funded under ADB's loans are environmentally sustainable and sound, are designed to operate in compliance with applicable regulatory requirements, and are not likely to cause significant environmental, health, or safety

hazards.

22. All three ADB's safeguard policies (environment, involuntary resettlement and indigenous people) involve a structured process of impact assessment, planning, and mitigation to address the adverse effects of projects throughout the project cycle. The safeguard policies require (i) identification and assessment of impacts early in the project cycle; (ii) developing and implementing plans to avoid, minimize, mitigate, or compensate for the potential adverse impacts; and (iii) informing and consulting affected people during project preparation and implementation. The policies apply to all ADB-financed projects, including private sector operations, and to all project components, as well as to all components outside the project scope but which, if not included, would make the project non-viable; referred to as associated projects. For 'Category A' project an EIA including an EMP is required. For 'Category B' an IEE, including an EMP, is required and for 'Category C' an EIA or IEE is not required, although environmental implications need to be reviewed through preparation of a due diligence report.

23. The proposed SEIP has been categorized as "Category C" from environmental point of view and environmental implications of the SEIP is required to be prepared and disclosed. The environmental implications of the SEIP will be assessed to ensure that the potential adverse environmental impacts are appropriately addressed in line with ADB's Safeguards Policy Statement (2009). However an IEE of SEIP is also required to be prepared to meet the requirements of the DoE for environmental safeguards compliances and obtaining an environment clearance certificate (ECC). An environmental screening using rapid environmental assessment (REA) checklist is prepared (annex) to determine environmental category of SEIP. Since IEE will not be prepared for ADB, but a due diligence report (DDR) shall be prepared.

III. DESCRIPTION OF SEIP

A. Overview

24. As stated elsewhere earlier, SEIP targets key priority economic growth sectors identified by government, toward improving job focused skills along with up-skilling of the existing workforce to ensure availability of 'required skills to industry standards'. Toward this end, SEIP envisages extending support to training providers in working with industry to address identified skills, to enable industry growth and increased employment through the provision of market responsive enhanced skills training programs. At least 15 priority sectors will be covered during the 7-year period.

25. Six priority sectors are selected for training program under Tranche 1 to adopt a demand driven approach with effective inputs from Industry Skills Councils (ISCs), Employer Associations and Employers. The priority sectors targeted initially by SEIP in Tranche 1 are: (i) Readymade Garments (RMG & Textile); (ii) Construction; (iii) Information and Technology (IT); (iv) Light Engineering/Manufacturing; (v) Leather and Footwear; and (vi) Maritime. The industry associations and internationally recognized employer associations with substantial membership coverage of priority economic sectors and formally recognized by the Government of Bangladesh through the apex policy making body, the National Skills Development Council (NSDC), will be engaged.

B. Location of SEIP

26. Training activities of SEIP will be conducted at 32 public training institutes available at 32 locations in various districts of Bangladesh. Moreover the training programs of the associations will be conducted in 25 training centers and also in the member factories.

C. Connectivity to the Locations

27. Selected SEIP locations are well connected through rail, road and air.

D. SEIP Strategy

28. No new building and construction will be done by SEIP. Rather, existing facilities, with minor adjustment or renovations to cater to the training activities, both at public and private sector enterprises will be utilized for up-skilling process. SEIP will finance skills training of 260,000 trainees with 70% job placement (182,000) during tranche 1 and a total training of 1.5 million (1.05 million job placements) during the project period (2014-2023).

29. Five types of institutions/organizations are expected to deliver these training targets with 70% job placements. These are:

- a) Public training providers, viz., 9 Technical School and Colleges (TSCs) under the Directorate of Technical Education (DTE), 20 Technical Training Centers (TTCs) under the Bureau of Manpower Employment and Training (BMET), and 3 Bangladesh Industrial Technical Assistance Center (BITAC) under the Ministry of Industry. Around 50,000 training target is proposed through 32 public training providers.
- b) Palli KarmaSahayak Foundation (PKSF). Around 10,000 training target is proposed through nongovernment organizations which are already PKSF partners in imparting livelihood programs and related training linked to gainful employment or self-employment. PKSF is uniquely placed to link skills training through its well established partnership arrangements with the best NGOs in Bangladesh.
- c) Bangladesh Bank. Around 10,000 training target is proposed through the Bangladesh Bank (BB) linked with its small and medium enterprise support program. Government and ADB already have good experience working with the Bangladesh Bank in implementing the SME project through selected commercial banks.
- d) Industry Associations. Around 190,000 training target (new entrants and up-skilling) is proposed through 8 industry associations [Bangladesh Garment Manufacturing and Exporters Association (BGMEA), Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA), Bangladesh Textile Mills associations (BTMA) Leather and Footwear, Bangladesh Association of Construction Industry (BACI), Bangladesh Engineering Industry Owners' Association (BEIOA), Bangladesh association of call centers operators (BACCO) and Maritime] in 6 priority sectors.
- e) Private training providers. It is proposed to engage 10-15 proven private training providers initially to complement some of the training targets noted above based on a set of agreed selection criteria and process.

E. Training Program

30. Training program will be developed and prioritized according to ISC and Industry Association identified skills needs. Priorities will be updated annually in the form of a published Industry Training Plan. SEIP will maintain the quality and relevance of the training packages developed with ISCs through development and implementation of training programs that require structured industrial attachment (on the job training) with learning in the workplace directly relevant to the competencies being acquired in new skills programs developed with industry. From NTVQF Level 1-5, programs should ensure employers are involved in delivery and assessment of skills against the industry standards through structured on the job training to build trust across industry that skills programs address industry requirements and certification of skills involve work place demonstration and assessment. Implementation of new training will involve establishing agreements with industry to undertake workplace based training and ensure training packages specify and link competencies with planned industrial attachment.

F. Training Courses

31. Courses will be either on job-focused packages of skill competencies based on CBT standards (approved by ISCs) or existing BTEB approved modular courses. Once CBT courses with associated elements such as, packages of skill competencies, certified CBT teachers, industry assessors, registered training organizations (RTO) with BTEB aligned to industry endorsed standards are complete, institutions will deliver CBT courses by replacing or updating existing courses.

32. SEIP will contract a specialist agency to coordinate and pilot 3 approaches to job placement and employment services. The first will establish job placement services unit in training institutions to: (i) facilitate on the job training, (ii) liaise with local employers to facilitate job placement, and (iii) work with local employers to improve the responsiveness of training programs to local employer needs and to facilitate training solutions to these identified needs. Training providers will be supported to deliver training programs in flexible ways to meet employer needs. This could involve different types of training provision (apprenticeships, enterprise based training, part time study options) negotiated between the training provider and the employer and reflected in a training plan or agreement. The second approach is to support intermediary agencies that specialize in job placement and employment services and are specifically funded based on the number of graduates they place into employment. And a third approach is to work with employer associations and ISCs to fund placement services through major employer networks to ensure industry skills gaps are filled. These models will be monitored and reported to guide future policy development by the NSDC and key ministries that could be taken to scale in Tranche 3 and 4 of the SEIP.

G. Environmental Categorization of SEIP

33. As stated in paras 21 and 22 above, type of activity, location and type of work involved and size as well as severity of pollution loads due to activities during preparatory and operational stages make SEIP put under DoE and ADB categories Orange B and C, respectively, requiring respective type of IEE for DoE and preparation of a document on reporting environmental implication of the Project.

IV. POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

34. Although nothing has been categorically spelled out in the project papers of SEIP, it could be assumed based on the condition of assessment of the existing structures of the selected up-skilling training facility sites, that some sort of minor repair, renovation and restoration might be necessary in the existing built forms. Overall improvement of environmental management of some of the training-site buildings in terms of appropriate drainage, handling and disposal of sanitary and solid waste might also be required to cater to the need of the prospecting trainees.

35. SEIP will also contribute positively to the local environment specific to the selected training sites by developing healthy and safer environment to the premises housing such sites with natural light and well ventilated classrooms, structures resilient to environmental extremes (including climate variability such as severe storms and, in some cases, geophysical hazards such as earthquakes and landslides), improve hygiene among trainee, and provide clean drinking water. Capacity building of stakeholders in environmental safeguards, solid waste management including improved methods of repair, renovation, retrofitting of old structures (if any), and preparation of resilient infrastructure (if necessary) will enhance knowledge and awareness for sustainable infrastructure development of the selected training sites in future. However, such activities may cause some adverse environmental impacts including dust and noise pollution, though very minor and insignificant in scale, disruption of natural ecosystem, occupational health hazards, risk from existing poor sanitation system and land as well as water contamination. Due to some vulnerable geographic location (in some cases, if any), there might also be some risks including those of natural disasters (e.g., earthquakes, cyclone, floods, landslide, etc.) and extreme climate events. These impacts are not anticipated to be induced by SEIP but rather, they are related to the geographical location of some of the training sites and climate induced.

36. The following table (Table 1) summarizes the impacts that are expected to arise from SEIP activities:

Table 1: SEIP Generated Potential Environmental and Social Impacts with Mitigation Measures

Anticipated SEIP Aspect	Potential Impact	Magnitude of Impact	Mitigation/Enhancement Measures
SEIP Preparatory and Operational Stages			
Access, utility relocation	Disruption to local and existing amenities	Insignificant	Access to properties (private properties, selected SEIP training centres, etc.) to be affected by SEIP shall be maintained throughout the Preparatory Stage. In case any need arising to temporarily close any access, the owners of the property to be affected shall be given notification of the extent, timing and duration at least 24 hours prior to the closure.
Land degradation	SEIP will not be required to work on any additional land beyond the selected training premises.	Zero	Nil

Anticipated SEIP Aspect	Potential Impact	Magnitude of Impact	Mitigation/Enhancement Measures
Clearing of trees/Removal of vegetation	Nil	Zero	Nil
Air and noise pollution	Dust and noise nuisance from building repair/renovation work	Minor to insignificant	Wherever feasible, dust generating type of work shall be done during off-training time. Building repair/renovation work shall be limited to day light hours.
Drainage management	Drainage congestion Water logging Vector proliferation	Minor to insignificant	Drainage lines shall be identified and appropriate design will be made for sediment control prior to undertaking repair/renovation work on selected SEIP training sites.
Spoil and solid waste disposal	Drainage blockage causing localized ponding and/or muddy runoff.	Minor to insignificant	Do not dispose spoil and solid waste on drainage path
Water pollution	Water pollution from building repair/renovation activities.	Minor to insignificant	Prohibit direct disposal of solid and liquid waste into nearby water bodies, drains or ponds.
Occupational health and safety	Lack of minimum required facilities of space, ventilation, sanitation, light and safe drinking water. Lack of safety tools. Lack of good construction and housekeeping practices.	Major	Provide adequate space with ventilation, clean toilets, solid and liquid waste management; provide safe drinking water in work areas. Keep camp and work area clean and tidy. Provide adequate healthcare (first aid) and safety facilities within construction sites; Attach highest priority to safe construction practices. SEIP will enhance the skills of the workforce in combating the occupational health and safety hazards.
SEIP Operation Stage			
Achieving outputs: (i) market responsive inclusive skills training; (ii) quality assurance system strengthened; (iii) institutions strengthened; and (iv) effective program management.	Increased employment in 6 priority sectors (6 in tranche 1 and at least 15 by 2021). (continuous-MTR and subsequent tranches). Increased employment and income in priority sectors for males and females. <u>Substantially positive impact.</u>	Major and significant	Training process in the institutions should be regularly monitored, quality updated and system strengthened.
Water supply and sanitation	Lack of inadequate drinking water supply and sanitation facilities		Provide safe drinking water supply and proper sanitation facilities to the trainer and trainee;

V. ENVIRONMENTAL MONITORING AND REPORTING PLAN

37. The environmental monitoring plan forms the basis for verifying the extent of compliance during the implementation stages of the project. The objectives of an environmental monitoring program are:

1. to evaluate the performance of mitigation measures proposed in IEE;
2. to provide information which could be used to verify predicted impacts and thus validate impact prediction techniques;
3. to suggest improvement in environmental mitigation measures if required;
4. to provide information on unanticipated adverse impacts or sudden change in impact trends;

38. Implementation of mitigation measures will be ensured through both routine and periodic monitoring. Monitoring activities for SEIP activities at the above two phases of implementation will be as follows (Tables 2 and 3):

Table 2: Monitoring during Repair/Renovation Phase

Indicators of Monitoring	Types of Monitoring/ Method of Monitoring	Monitoring Frequency	Responsibility
Drinking Water Quality	Sampling, lab testing & comparison with generic standard	Once during repair/renovation period.	Owners/Heads of the Training Centre
Solid waste segregation Disposal	Direct observation	Everyday	Owners/Heads of the centre/Contractor/SEIP implementation units
Occupational health and safety	Direct observation	During repair/renovation	Owners/Heads of the centre/Contractor/SEIP implementation units
Water logging and vector Proliferation	Direct observation	During repair/renovation	Owners/Heads of the centre/Contractor/SEIP implementation units

Table 3: Monitoring during SEIP Operation Phase

Indicators of Monitoring	Types of Monitoring/ Method of Monitoring	Monitoring Frequency	Responsibility
Preparation of monitoring reports	Preparation of monitoring reports	Quarterly	Heads of the Training Centres/SEIP implementation units
Drinking Water Quality	Sampling, lab testing & comparison with generic standard	Bi-annually	Heads of the Training Centres/SEIP implementation units
Solid waste management	Records of waste collected and managed	Bi-annually	Heads of the centres/SEIP implementation units
Number of orientation and training on environmental safeguards compliance measures and health hazards and safety	Number of orientation and trainings conducted	During repair/renovation	Heads of the centres/SEIP implementation units
Water logging and vector Proliferation	Direct observation	During repair/renovation	Heads of the centres/SEIP implementation units

39. Each Directorate and SEIP implementation units may perform the responsibility of carrying out annual review to assess how effectively the environmental safeguard requirements have been followed.

VI. CONCLUSION AND RECOMMENDATIONS

40. This report assessed various existing environmental parameters in and around the SEIP selected training and, although adverse impacts to be generated during SEIP preparatory stage will be minor and insignificant, outlined the actions planned to minimize any significant negative impact. None of the SEIP training sites is located in a sensitive ecosystem, and is not significant from the historical and cultural perspective. SEIP will not cause any significant adverse environmental and social impacts during repair or renovation phase. Rather, the positive impacts due to SEIP operations will more than outweigh the insignificant negative impacts.

41. The limited and insignificant negative impacts due to SEIP are, over an insignificantly very short period, mainly associated with water logging, dust and noise pollution, occupational health hazards, risk from poor sanitation system, and management of labor at the sites. Moreover, most of the associated impacts are expected to be limited to the building repair/renovation phase and, will therefore, be absolutely temporary in nature. Adequate mitigation actions will be undertaken in line with management and monitoring of the set of recommended mitigation measures. Regular monitoring of the recommended mitigation measures shall also be carried out during the implementation phase of the project.

Annex 1: Rapid Environmental Assessment (REA) Checklist

Instructions:

- (i) The project team completes this checklist to support the environmental classification of a project. It is to be attached to the environmental categorization form and submitted to the Environment and Safeguards Division (RSES) for endorsement by Director, RSES and for approval by the Chief Compliance Officer.
- (ii) This checklist focuses on environmental issues and concerns. To ensure that social dimensions are adequately considered, refer also to ADB's (a) checklists on involuntary resettlement and Indigenous Peoples; (b) poverty reduction handbook; (c) staff guide to consultation and participation; and (d) gender checklists.
- (iii) Answer the questions assuming the "without mitigation" case. The purpose is to identify potential impacts. Use the "remarks" section to discuss any anticipated mitigation measures.

Country/Project Title: BAN: Skills for Employment Investment Program (SEIP)

Sector Division: SARD/SAHS

Screening Questions	Yes	No	Remarks
A. PROJECT SITING IS THE PROJECT AREA ADJACENT TO OR WITHIN ANY OF THE FOLLOWING AREAS:			Specific details on the training institutes targeted for renovation/refurbishment/expansion is not known. Any training institutes that qualify as category "A" will not be included in the program.
<ul style="list-style-type: none"> ▪ UNDERGROUND UTILITIES 		√	
<ul style="list-style-type: none"> ▪ CULTURAL HERITAGE SITE 		√	
<ul style="list-style-type: none"> ▪ PROTECTED AREA 		√	
<ul style="list-style-type: none"> ▪ WETLAND 		√	
<ul style="list-style-type: none"> ▪ MANGROVE 		√	
<ul style="list-style-type: none"> ▪ ESTUARINE 		√	
<ul style="list-style-type: none"> ▪ BUFFER ZONE OF PROTECTED AREA 		√	
<ul style="list-style-type: none"> ▪ SPECIAL AREA FOR PROTECTING BIODIVERSITY 		√	
<ul style="list-style-type: none"> ▪ BAY 		√	
B. POTENTIAL ENVIRONMENTAL IMPACTS WILL THE PROJECT CAUSE...			
<ul style="list-style-type: none"> ▪ Encroachment on historical/cultural areas? 		√	
<ul style="list-style-type: none"> ▪ Encroachment on precious ecology (e.g. sensitive or protected areas)? 		√	

Screening Questions	Yes	No	Remarks
▪ Impacts on the sustainability of associated sanitation and solid waste disposal systems?		√	
▪ Dislocation or involuntary resettlement of people?		√	
▪ Disproportionate impacts on the poor, women and children, Indigenous Peoples or other vulnerable groups?		√	
▪ Accident risks associated with increased vehicular traffic, leading to loss of life?		√	
▪ Increased noise and air pollution resulting from increased traffic volume?		√	There may be some disturbance to trainees, teachers and staff during training times, but this can be mitigated by proper time management and using silencer or managing any loud/heavy aspects of construction after training hours.
▪ Occupational and community health and safety risks?	√		Renovation of existing buildings during limited number of closed days. Minor to insignificant risk to occupational health and safety over a significantly limited period of renovation work
▪ Risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project construction and operation?		√	
▪ Generation of dust in sensitive areas during construction?		√	Minimum dust emission during renovation work to be carried out in certain specific rooms during the limited number of closed days.
▪ Requirements for disposal of fill, excavation, and/or spoil materials?		√	There will be adequate solid waste management in place and construction materials will not be mixed with construction materials
▪ Noise and vibration due to blasting and other civil works?		√	
▪ Long-term impacts on groundwater flows as result of needing to drain the project site prior to construction?		√	
▪ Long-term impacts on local hydrology as a result of building hard surfaces in or near the building?		√	
▪ Large population influx during project construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)?		√	The project will not cause burden on social infrastructure and services as large population influx is not anticipated.
▪ Social conflicts if workers from other regions or countries are hired?		√	Generally, the works are of small nature and mostly labor will be hired from the locality.
▪ Risks to community safety caused by fire, electric shock, or failure of the buildings safety features during operation?		√	Proper safety measures will be in place

Screening Questions	Yes	No	Remarks
<ul style="list-style-type: none"> ▪ Risks to community health and safety caused by management and disposal of waste? 		√	
<ul style="list-style-type: none"> ▪ Community safety risks due to both accidental and natural hazards, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community throughout project construction, operation and decommissioning? 		√	

Climate Change and Disaster Risk Questions The following questions are not for environmental categorization. They are included in this checklist to help identify potential climate and disaster risks.	Yes	No	Remarks
<ul style="list-style-type: none"> ▪ Is the Project area subject to hazards such as earthquakes, floods, landslides, tropical cyclone winds, storm surges, tsunamis or volcanic eruptions and climate changes (see Appendix I)? 		√	Some of the low-lying coastal areas of the project sites (e.g. Satkhira, Khulna, etc.) may be vulnerable to climate variability and change (e.g. floods, cyclone, storm surge, etc.). Dhaka and Chittagong and Sylhet are earthquake prone areas. CHT areas are vulnerable to landslide. Appropriate preparedness measure will be place to cope with extreme weather and disasters.
<ul style="list-style-type: none"> ▪ Could changes in precipitation, temperature, salinity, or extreme events over the Project lifespan affect its sustainability or cost? 		√	
<ul style="list-style-type: none"> ▪ Are there any demographic or socio-economic aspects of the Project area that are already vulnerable (e.g. high incidence of marginalized populations, rural-urban migrants, illegal settlements, ethnic minorities, women or children)? 		√	
<ul style="list-style-type: none"> ▪ Could the Project potentially increase the climate or disaster vulnerability of the surrounding area (e.g., increasing traffic or housing in areas that will be more prone to flooding, by encouraging settlement in earthquake zones)? 		√	

Annex 2: Outline of Initial Environmental Examination (IEE) Report

- I. Executive Summary
- II. Project Description (with salient feature)
- III. Description of Existing Environment in the Project Area
 - Physical environment
 - Biological environment
 - Socio-economic and physical cultural resources
- IV. Potential Environmental Impacts and Mitigation Measures
 - Beneficial impacts and maximization measures
 - Adverse impacts and mitigation measures
- V. Analysis of Alternatives
- VI. Institutional Arrangements
- VII. Environmental Monitoring and Management Plan (EMP)
- VIII. Information Disclosure, Public Consultation and Participation
- IX. Grievance Redress Mechanism
- X. Conclusion and Recommendations

Annexes: (include approved TOR with approval letter; public notice certificate of deed; format of survey questionnaire, recommendation letter from Pourashova/municipalities; clearance letter from the Department of environment, maps, photographs; list of trees to be cleared; list of community infrastructures to be affected by the project etc.).