



# Concept Environmental and Social Review Summary

## Concept Stage

### ( ESRS Concept Stage)

Date Prepared/Updated: 10/11/2023 | Report No: ESRSC03835

**I. BASIC INFORMATION****A. Basic Operation Data**

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P500727	Investment Project Financing (IPF)	ISO	2024
Operation Name	Inclusive Services and Opportunities for Host Communities and Displaced Rohingya People		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Bangladesh	Bangladesh	SOUTH ASIA	Social Protection & Jobs
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
The People's Republic of Bangladesh	Ministry of Women and Children Affairs, Ministry of Health and Family Welfare, Ministry of Disaster Management and Relief	21-Feb-2024	26-Apr-2024
Estimated Concept Review Date	Total Project Cost		
28-Sep-2023	350,000,000.00		

**Proposed Development Objective**

To improve access to economic opportunities, health, and gender responsive services for vulnerable Host and Rohingya communities

**B. Is the operation being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project Activities**

The proposed operation aims to support the Government of Bangladesh in responding to the human capital development needs of the displaced Rohingya population (DRP) as well as host communities that have been negatively affected by the protracted DRP crisis. Building on several Bank operations and humanitarian assistances that have been supporting both DRP and host communities since the influx of DRP in 2017, this project will take a medium-term developmental approach, which not only builds and protects the human capital of DRP and host communities but also



provides DRP with better opportunities for a dignified, purposeful, and productive life in the camps and further capacitate them for eventual voluntary and sustainable return to Myanmar. The project will support the Government's development interventions in both Cox's Bazar and the Bhasan Char Island.

## **D. Environmental and Social Overview**

### **D.1 Overview of Environmental and Social Project Settings**

The Project will be limited to Cox's Bazar (including DRP camps) and Bhashan Char, located around 6 km from Sandwip island and 60 km from the mainland. The island is sandy with intermittent trees planted to protect its shores. There is an embankment built around it to deter ocean waves and storm surges. A number of DRP accommodations have been built to cater for DRPs. The population of Cox's Bazar is around 3 million including few small ethnic communities (SEC). Since 2017, over a million DRPs have been residing in Ukhiya and Teknaf Upazilas, as well as around thirty thousands on the island of Bhasan Char.

It was estimated that 40 percent and 30 percent of the HCs in Ukhiya and Teknaf respectively lived in poverty in 2016. At least 80 percent of the overall DRP was highly or entirely dependent on life-saving external assistance while the remaining 20 percent could only partially meet their needs through coping strategies including sale of jewelry and purchase of food on credit. Only 2 percent of Rohingya girls—as compared with 15 percent of boys—between ages of 15 and 18 years have access to learning in informal education centers in the camps. Access to health services is also constrained due to lack of female staff for gender-appropriate care. Fear of sexual harassment and violence limits mobility of women and caregivers. Social non-cooperation and discrimination restrict social participation and access to services. Discrimination in resource allocation within family is common.

As the DRP are sheltered in congested camps and are not allowed to integrate with local communities, their access to basic services and livelihood opportunities are limited. In the meantime, the influx of the DRP has negatively affected host communities (HCs) and exacerbated local development challenges. Both host and Rohingya communities have enormous needs for essential human services which places a significant strain on an already resource-constrained delivery system.

### **D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts**

The Project will be implemented by the Ministry of Disaster Management and Relief (MODMR), the Ministry of Health and Family Welfare (MOHFW) and the Ministry of Women and Children Affairs (MOWCA) (for GBV services) through UN partner(s) (WFP, UNFPA, UNICEF and IOM) and PKSF, an FI.

MODMR is implementing the Safety Net System for the Poor (SNSP) and Employment Generation Program for the Poorest (EGPP) Project under safeguard system. They are yet to implement any project under ESF. Though the Project activities under them do not have significant ES risks, MODMR needs capacity building on the ESF, including assessment and management of ES risks, consultation with stakeholders, development of ES instruments, monitoring and reporting. MOWCA has experience in ESF under Bangladesh Enhancing Investments and Benefits for Early Years (BEIBEY) Project dealing with newborn and pregnant women. MOHFW is a long time Bank client and is implementing the Health and Gender Support Project (HGSP) in the same area of the proposed Project under ESF with similar activities. The HGSP supports the expansion of the provision of HNP services with a focus on DRP Camps and HCs across Cox's Bazar; medical waste management, enhance community-level interventions, services to address GBV and psychosocial needs of project beneficiaries. They are also implementing Health Sector Support Program (HSSP) for improving health service delivery. The MOHFW is very familiar with Bank safeguard policies as well ESF and has a reasonable track record of implementing ES management activities in Bank-financed projects. The MOHFW and MOWCA have undergone a number of ESF related courses and capacity building measures provided by the Bank and their ES management capacity is satisfactory.



The UN partners are already working with the Bank in HGSP with satisfactory ES performance. PKSF (FI) has already worked under a number of Bank funded projects and has a robust ESMS reviewed by the Bank.

## **II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS**

### **A. Environmental and Social Risk Classification (ESRC)**

Moderate

#### **A.1 Environmental Risk Rating**

Moderate

The project will not finance any civil works (including no new health facilities) and will mainly focus on skills development, livelihood opportunities, integrated health, nutrition, population, and gender-based response and prevention services to both host and DRP communities. The key environmental risk is managing, transporting and disposing off the relatively minor medical waste that could generate for supporting delivery of Essential Service Package related to reproductive, adolescent, maternal, neonatal, and child health. The services will be delivered by the existing health facilities. Vaccines for the Project must be continuously stored in a limited temperature range and distributed to local cold storage facilities by refrigerated vehicle. Based on the existing procedure for routine medical services, each health facility will follow the same procedure for disposal of safety box like as incineration, pit burn etc. The disposal of safety box must be done in presence of the waste management committee. Ministry of Health and Family Welfare (MOHFW) through UN partner(s) is implementing the HGSP project where the medical waste management (MWM) practice is rated as satisfactory. The ES Management Framework (ESMF) of HGSP will be updated to include E&S screening mechanism and guidance for specific ES assessment and the ESMF will provide guidance about the preparation, consultation and disclosure of specific ES management plans. Code of practices of MWM will be an integral part of ESMF.

#### **A.2 Social Risk Rating**

Moderate

The social risks may emanate from the likelihood of the exclusion of disadvantaged and the vulnerable stakeholders (person with disability, female headed household, women and elderly, DRPs etc), due to their economic status, lack of access to information and decision making abilities from Project consultation and exclusion to receive Project benefits. This may exacerbate the current situation of employment, education, capacity development, health and nutrition of the intended beneficiaries. Project beneficiaries may also be exposed to medical wastes generated due to medical service interventions. The project will not involve any land acquisition. Physical and economic displacement are also unlikely. There will also be no civil works—hence the risks and impacts associated with such activities (labor influx, community safety due to civil works, traffic etc) will be minimal. There will also not be any impact on cultural heritages in the Project area. CXB has few small ethnic communities (SEC) meeting the criteria of ESS7. The Project activities are less likely to impact these communities negatively. The contextual factors of poverty, status of health and nutrition, lack of employment opportunities, likely SEA/SH cases may impact the social environment under which the project will be implemented. Given the scale and scope of activities, the potential social risk profile and the context under which the Project will be implemented, the Social risk is rated as Moderate.

### **B. Relevance of Standards and Policies at Concept Stage**

#### **B.1 Relevance of Environmental and Social Standards**

**ESS1 - Assessment and Management of Environmental and Social Risks and Impacts**

Relevant



There will be no civil works or land acquisition. The impact on biodiversity and cultural heritages is also not envisaged. However, generation of minor waste is likely from use of vaccines and other medical interventions. There are a few SECs meeting the criteria of ESS7 in Cox's Bazar and it is unlikely that the Project will impact them negatively. However, given the nature of cash transfer and interactions with the service providers and the beneficiaries, there is likelihood of SEA/SH issues. The vulnerable and the disadvantaged people may also be left out of consultation and benefits. The IAs will update the ESMF of HGSP—a similar Project in CXB to include E&S screening mechanism and guidance for specific ES assessment, preparation, consultation and disclosure of specific ES management plans. They will also update the ESCP, LMP, SEP, and SEA/SH Action Plan of HGSP reflecting the current project scenario which will be disclosed prior to Appraisal.

#### **ESS10 - Stakeholder Engagement and Information Disclosure**

Relevant

The IAs will engage in meaningful consultations with all stakeholders throughout the Project, paying special attention to the inclusion of women and vulnerable and disadvantaged groups. The IAs will update the Stakeholder Engagement Plan (SEP) of HGSP, a similar Project in CXB, to include stakeholder identification and analysis, means and methods of communication, sharing information and completion of feedback loop and a GRM. The main beneficiaries of the project are the HC and DRPs in CXB District as well Bhashan Char. Stakeholder engagement, consultation and communication, including a single GRM will be established administered by both the IAs. The GRM will be set up to address issues of both the HC and the DRPs in a timely manner, following due process. The GRM will be cognizant of and follow required levels of discretion and cultural appropriateness, especially when dealing with cases of SEA/SH cases. The GRM will be made accessible to all stakeholders.

#### **ESS2 - Labor and Working Conditions**

Relevant

There will be no civil works for this Project. Project workers will include staffs of the IAs and Implementing partners. The project will recruit HNP and GBV response service providers as contracted workers. There will also be community workers in the Project. Contracted workers will provide HNP service, hence they may be exposed to OHS risks from infectious diseases and medical wastes (disposed off needles, sharp instruments etc). Government employee (those in the PMU) will retain the contractual agreement of the Government. The Project LMP of HGSP, a similar Project in CXB will be updated to cover issues with all types of workers, including those of the Community Workers' OHS, compensation mechanism etc. This plan will also include mitigation measure to ensure health and safety of the workers, non discrimination and good working environment. A worker GRM (responsive to SEA/SH) will also be developed so that workers (including Community Workers) can raise issues and concerns.

#### **ESS3 - Resource Efficiency and Pollution Prevention and Management**

Relevant

There is a likelihood of minimal waste generation due to use of vaccines and other medical services. The wastes will be managed as per code of practices, existing system in the health facilities following protocols of separation of different kinds of waste, treatment, reuse, recycle and transportation, storage and final disposal of wastes in approved sites/ through incineration/ other methods. Resource usage (Energy, water and raw material) is expected to be minimal. ESMF will include waste management guidelines and best practices.

#### **ESS4 - Community Health and Safety**

Relevant



There will be no civil works under this project therefore communities will not be subject to civil work related impact (traffic, labor, construction wastes, dusts etc). The interaction between the beneficiaries and the project related staffs, especially in areas which would be hard reach (and thereby hard to monitor) may give rise to SEA/SH issues. Cash transfer, capacity building and employment activities may also create situations to affect SEA/SH environment. The SEA/SH risk is Substantial. An SEA/SH Action Plan will be developed for the Project and the Project GRM will be tailored to address SEA/SH concerns. A Life and Fire Safety (L&FS) risk mitigation measure was put in place in a similar project (HGSP) being implemented in CXB. Similar measures will also put in place for this Project basing on lessons learnt and good practices.

**ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Not Currently Relevant

The project activities do not envisage any land acquisition. Physical and economic displacement of people are also not expected.

**ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Not Currently Relevant

The Project is unlikely to impact any biodiversity and/or natural resources.

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

Relevant

The CXB district has few small ethnic communities (SEC) that meet the ESS7 criteria. The Project is unlikely to impact these communities negatively. However the Project ESMF will contain screening mechanism that will help assess the impacts on the SECs and Small Ethnic Community Development Plan (SECDPs) may be prepared if deemed necessary during implementation. The SECs will be fully consulted and all project related information will be shared with them so they can participate and benefit from the project. They will also have full access to the project level GRM.

**ESS8 - Cultural Heritage**

Not Currently Relevant

The Project is unlikely to impact any cultural heritage.

**ESS9 - Financial Intermediaries**

Relevant

The Project will assign Palli Karma Shahayak Foundation (PKSF), a Financial Intermediary to support the scale up of selected micro finance programs in CXB leveraging PKSF's network of Partner Organizations (PO). PKSF has worked for a number of WB funded project (RAISE, BD WASH, SMART to name a few) and has a robust ESMS to address ES issues. Their ESMS was reviewed by the Bank and gap filling measures, as was suggested by the Bank, have been put in place.

**B.2 Legal Operational Policies that Apply**

**OP 7.50 Operations on International Waterways**

No

**OP 7.60 Operations in Disputed Areas**

No

**B.3 Other Salient Features**



**Use of Borrower Framework**

No

Borrower framework will not be used

**Use of Common Approach**

No

Common approach will not be used

**C. Overview of Required Environmental and Social Risk Management Activities**

**C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by Appraisal?**

By Appraisal, the IAs will update following documents of the HGSP – a similar project under implementation in CXB. A single set of each instrument will jointly be developed by the IAs.

ES Management Framework (ESMF) –to include E&S screening mechanism and guidance for specific ES assessment (including MWM Code of Practices) and Life and Fire Safety measures

Stakeholder Engagement Plan (SEP) (including a Grievance Redress Mechanism (GRM) for both the HC and the DRP)– to identify and analyze stakeholders, create a feedback loop and provide a mechanism to raise issues

Labor Management Procedures (LMP) – to address issues of labor engagement, working conditions, OHS and grievance mechanism, including those concerning Community Workers

Environmental and Social Commitment Plan (ESCP) – to summarize material measures and actions to be taken by the Clients to address ES issues

SEA/SH Action Plan – to describe interventions required to raise awareness about SEA/SH, mechanism to manage and administer SEA/SH cases

**III. CONTACT POINT**

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**IV. FOR MORE INFORMATION CONTACT**



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## V. APPROVAL

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