**BANGLADESH ENVIRONMENTAL SUSTAINABILITY AND TRANSFORMATION PROJECT (BEST) (P172817)**

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**Department of Environment (DoE)**

**Bangladesh Bank (BB)**

**Bangladesh Road Transport Authority (BRTA)**

**Bangladesh Hi-Tech Park Authority (BHTPA)**

**January 2022**

**ABBREVIATION**

ADB: Asian Development Bank

AEC: Atomic Energy Commission

AQI: Air Quality Index

AQM: Air Quality Management

BARC: Bangladesh Agricultural Research Council

BBS: Bangladesh Bureau of Statistics

BCR: Benefit Cost Ratio

BCSIR: Bangladesh Council of Scientific and Industrial Research

BDT: Bangladesh Taka

BEST: Bangladesh Environmental Sustainability and Transformation

BEZA: Bangladesh Economic Zones Authority

BFIDC: Bangladesh Forest Industries Development Corporation

BHTPA: Bangladesh Hi-tech Park Authority

BJMC: Bangladesh Jute Mills Corporation

BRTA: Bangladesh Road Transport Authority

BSCIC: Bangladesh Small and Cottage Industry Corporation

BTK: Bulls Trench Kilns

BUET: Bangladesh University of Engineering and Technology

CAMS: Continuous Air Monitoring Station

CASE: Clean Air and Sustainable Environment

CBA: Cost Benefit Analysis

CBO: Community Based Organizations

CETP: Central Effluent Treatment Plant

CERC: Contingency Emergency Response Component

CNG: Compressed Natural Gas

CO: Carbon Monoxide

COD: Chemical Oxygen Demand

CSG: Credit Risk Guarantee

CSO: Civil Society Organizations

DMP: Dhaka Metropolitan Police

DoE: Department of Environment

DTCA: Dhaka Transport Coordination Authority

DTCB: Dhaka Transport Coordination Board

ECA: Environmental Conservation Act

ECC: Environment Clearance Certificate

ECR: Environment Conservation Rule

EIA: Environmental Impact Assessment

EIRR: Economic Internal Rate of Return

EMF: Environmental Management Framework

E&S: Environmental and Social

ED: Executive Director

EHS: Environmental Health and safety

EPR: Extended Producer Responsibility

EQS: Environmental Quality Standard

ESCP: Environment and Social Commitment Plan

ESIA: Environment and Social Impact Assessment

ESMF: Environment and Social Management Framework

ESMP: Environment and Social Management Plan

ESS: Environment and Social Standards

ETP: Effluent Treatment Plant

FCK: Fixed Chimney Kilns

FGD: Focus Group Discussion

FIRR: Financial Internal Rate of Return

FS: Feasibility Study

GBV: Gender based Violence

GCSG: Green Credit Risk Guarantee

GDP: Gross Domestic Product

GHG: Greenhouse Gas

GoB: Government of Bangladesh

GM: Grievance Mechanism

GRC: Grievance Redress Committee

GRM: Grievance Redress Mechanism

GRS: Grievance Redress System

HC: Hydrocarbon

HCWM: Healthcare Waste Management

HHK: Hybrid Hoffman Kiln

HTP: High Tech Park

HWM: Hazardous Waste Management

IA: Implementing Agency

ICT: Information and Communication Technology

IDCOL: Infrastructure Development Company Limited

IEC: Information, Education and Communication

IMED: Implementation Monitoring and Evaluation Department

IT: Information Technology

IWM: Integrated Water Management

JICA: Japan International Cooperation Agency

KII: Key Informant Interview

KPI: Key Performance Indicators

LGRD: Local Government and Rural Development

LMP: Labor management Procedures

MoWCA: Ministry of Women and Children Affairs

MoEFCC: Ministry of Environment, Forest and Climate Change

MoF: Ministry of Finance

MSPVAW: Multi-Sectoral Programme on Violence Against Women

MT: Metric Ton

NEMAP: National Environment Management Action Plan

NGO: Non-government Organization

NILU: Norwegian Institute for Air Research

NPV: Net Present Value

OHS: Occupational Health and Safety

PAI: Project Area of Influence

PAP: Project Affected Persons

PD: Project Director

PFI: Participating Financial Institutions

PIU: Project Management Unit

PM: Particulate Matter

PMO: Prime Minister’s Office

PIU: Project Management Unit

PPA: Project Preparation Advance

PPE: Personal Protective Equipment

PPP: Public Private Partnership

PPR: Public procurement Rules

PWD: Public Works Department

3R: Reduce, Reuse, Recycle

RAP: Resettlement Action Plan

RECP: Resource Efficient and Cleaner Production

RHD: Roads and Highway Department

SCF: Standard Conversion Factor

SDG: Sustainable Development Goals

SEP: Stakeholder Engagement Plan

SOP: Standard Operating Procedures

STS: Secondary Transfer Station

SWM: Solid Waste Management

TDS: Total Dissolved Solid

ToR: Terms of Reference

TS: Total Solid

TSS: Total Suspended Solid

UN: United Nations

UNDP: United Nations Development Program

UNEP: United Nations Environment Program

UNFCCC: United Nations Framework Convention on Climate Change

US: United States

USD: United States Dollar

USEPA: United States Environmental Protection Agency

VIC: Vehicle Inspection Center

VOC: Volatile Organic Compounds

WARPO: Water Resource Planning Organization

WB: World Bank

WHO: World Health Organization

WQM: Water Quality Management

WTP: Water Treatment Plant

ZK: Zigzag Kilns

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**Chapter 1: Introduction and Project Description**

## **1.1 Introduction**

Stakeholder’s engagement and communication is an important tool for ensuring transparency, accountability and effectiveness of development projects. This document lays out a stakeholder engagement strategy for engaging stakeholders associated with ‘Bangladesh Environmental Sustainability and Transformation Project (P172817)’. This Stakeholder Engagement Plan (SEP) is prepared for the World Bank funded Bangladesh Environmental Sustainability and Transformation Project, to be implemented by the Ministry of Environment Forestry and Climate Change (MOEFCC)/ Department of Environment (DOE) through its existing structures in close coordination with Bangladesh Bank (BB), Bangladesh Road Transport Authority (BRTA) and Bangladesh High Tech Park Authority (BHTPA). The coordination and monitoring mechanism will consist of committees, with the participation of focal persons from MOEFCC (DOE), BB, BRTA and BHTPA at the central, divisional, district and upazila levels as the case may be. The project will provide the resources needed by MOEFCC and MOLGRD&C to make this coordination and monitoring mechanism functional.

The purpose of the present Stakeholder Engagement Plan is to detail how Stakeholder Engagement will be practiced throughout the course of the project and which methods will be used as part of the process; as well as to outline the responsible parties in the implementation of Stakeholder Engagement activities. In addition, the SEP will detail how the views and concerns of the stakeholders are reflected in the project. Timely and two-way information sharing, and communication can help to mobilize and maintain stakeholder support for the project and advance the overall project goals.

The SEP outlines in detail the commitment of the GoB as regards to engaging the stakeholders of the ‘Bangladesh Environmental Sustainability and Transformation Project (P172817). It also details the project Grievance Redress Mechanism (GRM) and future plan of action as a measure to engage with the stakeholders and to resolve any potential cases of grievances arising out of implementation of the project.

The Project is being implemented amidst COVID-19 outbreak which is affecting the health of both the workers and the communities. Absence of PPE and mask, lack of training and awareness and social distancing protocol may exacerbate the situation. As such face-to-face interactions are to be avoided / undertaken maintaining COVID protocol and IT based interactions/FGD in small groups may have to be planned by the Borrower. DOE and other co implementing agencies while planning stakeholder engagements in different forms is to comply with national, World Bank and WHO guidelines in this regard.

## **1.2 Project Description**

Bangladesh is one of the world’s most populous countries with an estimated 165 million people with per capita income of US$ 1,968.792 in 2020[[1]](#footnote-1). Sustained growth of Bangladesh’s economy and urban population has seriously polluted the environment. In 2018, Bangladesh was ranked 179th among all 180 countries analyzed by the Environmental Performance Indicator Report. Among all indicators, air quality and heavy metals were the two worst indicators, ranked at 179th and 177th respectively. In addition, Bangladesh’s performance in water and sanitation was ranked 128th. These rankings reflect serious pollution challenges faced by the country negatively affecting livability of its cities, vocational health of its growing work force and public health. Dhaka Division hosts 45 percent of all industry jobs and 37 percent of all service jobs while it is home to around 30 percent of Bangladesh’s population. Dhaka has the most visible air pollution issues in the country and its key air pollutants are particular matters (PM). Key PM sources of Dhaka are industrial sources (mainly brick kilns for over 38-58%), transport sources (vehicle emission for 10-40%), and municipal sources (road and construction dusts, waste burning for about 21%)[[2]](#footnote-2).

Most visible pollution issues in Bangladesh are ambient air and river pollution of the greater Dhaka area and waste issues in major cities and industrial centers. Available data show that mainly brick kilns, transport (congestion and old and poorly maintained vehicles) and dusts (due to construction and soil erosion) are key sources of fine particulate matters (PM) with diameters that are generally 2.5 micrometers and smaller (PM2.5), which poses the greatest risk to health and is the main cause of reduced visibility. In addition, untreated and insufficiently treated municipal sewage and industrial effluents (mainly from textile/RMG, leather, chemical and pharmaceutical industries), and improper disposal of all types of wastes are identified as key sources of river water pollution. The present municipal waste collection rate of about 35 percent at the national level. In addition, increasingly large amounts of plastic waste are released into the environment. This situation is expected to be further exacerbated with the country’s ambitious plan to build 100 special economic zones between 2015 and 2030.

Over the past three decades, Bangladesh has gradually developed its regulatory framework and institutional setups to control pollution and protect its environment. Bangladesh has also made good progress toward mainstreaming the environmental agenda. The Development partners (DPs) have also openly supported Bangladesh to address its pollution challenges. Among others, the country’s 2010–2021 National Sustainable Development Strategy, Seventh Five Year Plan (FYP, 2016-2020) and Country Investment Plan (CIP) for Environment, Forestry and Climate have listed green growth and climate resilience as national priorities. The Seventh FYP specifically calls for air quality improvement in Dhaka and other large cities and the enactment of the Clean Air Act. In addition, the government’s Bangladesh Delta Plan (BDP) 2100 has included project ideas to control the discharge of industrial and municipal wastes and wastewaters. Bangladesh Bank has also promoted green financing through its Green Banking Policy Guidelines for Banks (2011) and for Non-Bank Financial Institutions (NBFIs) and new Banks (2013). Along with these guidelines, the Bangladesh Bank has established a minimum target of direct green finance at 5 percent of the total loan disbursement/investment from January 2016 onwards for all banks and NBFIs, and instructed Banks and NBFIs to allocate 10 percent of their corporate social responsibility budget to address climate risks through grants or concessional financing. However, despite the positive changes in institutional and legal aspects of the environment, major weakness could be traced in both government and non-governmental organizations engaged in environmental activities.

The Ministry of Environment, Forest and Climate Change (MOEFCC) is the coordinating agency at the national level on all matters related to the environment and sets the climate change strategy for the country. All executive or decision-making power is concentrated at the top authority. This causes decision-making as well as enforcing of the environmental laws a difficult task. Through MOEFCC and DOE, Bangladesh has made tangible progress in further developing environmental policies, standards, guidelines, and legislations, including the 1995 Environment Conservation Act (ECA) (amended in 2010) that has introduced the environmental clearance certificates for industrial projects and authorized DOE to make rules and take monitoring and enforcement actions to protect the environment. Under the ministry, the Department of Environment (DOE) is responsible for environmental monitoring and enforcement. The DOE is also active in promoting environmental awareness and mobilizing public support to identify practical solutions to critical environmental problems. The DOE undertakes these tasks through its head office and divisional offices under the overall leadership of the Director-General (DG). Unfortunately, the DOE is especially handicapped due to lack of qualified and trained personnel. At the institutional level, the DOE has limited human resources (HR), technical capacity and monitoring, analytical and information technology (IT) infrastructure to properly monitor environmental quality and pollution discharges from industrial and municipal sources and disseminate such information to its population. With limited budget allocation, in 2017 DOE had a staff of 431 against an approved 735 posts. DOE staff at divisional and district offices have to work on both environmental clearance and environmental monitoring and enforcement at the same time undermines the accountability of the DOE. Since its divisional and district offices are seriously understaffed and could only process environmental clearance with delays and perform minimal monitoring and enforcement actions. In addition to staffing issues, the lack of directorates on water quality and HWM has limited the DOE’s capacity to properly manage such issues. Systematically, technical capacity of DOE staff needs to be strengthened to perform their tasks properly.

Overall, the project aims at strengthening GoB capacity in environmental management and reducing pollution discharges from the targeted sources. The project would support the following five components: The project will support the following five components: (a) environmental governance and infrastructure; (b) green financing; (c) vehicle emission control; (d) e-waste management infrastructure; and (e) contingent emergency response component (CERC). Summary of the components are given below. **Details of the project components are at Annex 1.**

***Component 1: Environmental Governance and Infrastructure*** will support DOE to improve its environmental management capacity through (a) regulatory and policy reforms to reposition the regulatory mandate of DOE from action-oriented pollution control to goal-oriented protection and improvement of environmental quality and promotion of green growth; (b) institutional reforms to shift DOE’s organizational structure towards specialization and decentralization with improved human and infrastructure; (c) DOE to establish the proposed Environment Fund to mobilize sustainable financing for various environmental protection initiatives; (d) capacity building to support DOE and its key stakeholders develop adequate technical capacity in environmental management and green growth; and (e) project management of DOE activities.

***Component 2: Green Financing for air pollution control*** will support the Bangladesh Bank (BB) to develop a green credit risk guarantee (CSG) scheme to first support the brick kiln sector to invest in green technologies to reduce its pollution discharges.

***Component 3: Vehicle Emission Control*** will support (a) the development of five new vehicle inspection centers through PPP arrangements; (b) technical assistance to improve BRTA’s capacity in vehicle inspection; and (c) project management at BRTA.

***Component 4: E-waste Management Infrastructure*** will support (a) the development of an e-waste management facility on a pilot basis through PPP arrangements to demonstrate technical, financial, environmental and social feasibility of e-waste management; (b) technical assistance to support proper operations of this new facility; and (c) project management at BHTPA.

**Component 5 *Contingent Emergency Response Component (CERC).*** This component will provide an ex-ante mechanism for the GOB to gain rapid access to World Bank financing to respond to an eligible crisis or emergency that causes major adverse economic and/or social impacts. Triggers for CERC activation will be clearly outlined in the Project Implementation Manual. Disbursements will be made against an approved list of goods, works, and services required to support crisis mitigation, response, and recovery.

**1.3** **Project Location and Beneficiaries**

The Bangladesh Environmental Sustainability and Transformation (BEST) project aims to strengthen environmental governance and to reduce pollution discharges from key sources at selected areas of Bangladesh. Dhaka, Kaliakair HTP and district of Cumilla, Noakhali, Mymensingh, Faridpur and Rangamati) would be selected for different major project interventions. For Divisional level laboratories and 30 district level offices, HTPs under BHTPA and 5 new vehicle Inspection Centers (VICs) specific location would be chosen countrywide. The exact locations/sites will be confirmed during project preparation. It is expected that project areas will be located in existing urban, peri-urban and industrial areas. Nevertheless, the proposed operation will have countrywide and multi-sectoral impact for both public and private sectors. The project beneficiaries include the general population, BB, PFIs, DOE, BHTPA and HTPs, BRTA, the private sector including private and commercial vehicle owners and their associations, owners and workers of selected brick kilns national and local governments, participating financial institutions. Through the BEST project, residents in Dhaka and and other cities and suburb will directly benefit from: a) improved air quality as a result of the: i) switch from traditional zigzag kilns to improved technologies such as Tunnel kiln, Hybrid Hoffman Kiln (HHK), and ii) decrease in vehicles environmental pollution, leading to decrease in accidents, hence lower mortality rates associated with transportation and b) effective management of e-waste by segregating metal and plastic products for reuse.

Direct beneficiaries include 20-30 owners of these brick plants that will receive grants and/or credit enhancements to start new technology. Other direct beneficiaries will be the people employed by DOE, 20-30 brick plants, the five VICs and the e-waste management facilities, estimated between 2,500-3,000 employees. These people will gain year-round employment and social security. Their job will also be safer as there will be less occupational hazard due to better working conditions. Potential benefits will also come from the elimination of child labor in kilns. Indirect beneficiaries will also be their families due to more reliable income of whoever is employed in such a plant. Assuming an average family in Bangladesh of 4.5 people as of 2020, the estimated indirect beneficiaries would be 10,000 – 12,000. Among them, women will especially benefit from better job opportunities and decreased pollution as they bear the brunt of such detrimental environmental phenomena.

The project would benefit entire Bangladesh population indirectly through Institutional Reform as indicated in Subcomponent 1.2 by creating 30 District Offices of DOE thus ensuring that all 64 districts have full DOE presence. Each district office will be equipped with dedicated wings on environmental quality monitoring, environmental enforcement and environmental analysis (laboratory). In this regard, six regional/divisional laboratories will be established in addition the existing central and two regional laboratories. DOE will also examine the feasibility of establishing upazila offices at important pollution hotspots.

The project will also benefit national and local governments by supporting institutional strengthening activities. In addition, the private sector will benefit from the project through increased support for green financing (grants/credit enhancements), and market creating and capacity building activities to promote delivery of green facilities.

## **1.4 Summary of Potential Environmental and Social Impacts**

The project aims at improving ambient air and surface water quality and waste management practices at selected localities of Bangladesh. The existing status of air and water quality is expected to improve and waste disposal recycling, reuse and management practices will also be enhanced. Given the project design, the project activities would not lead to generation and releases of any additional pollutants; rather it provides the mechanisms to reduce the generation and releases of pollutants and thus bring down health hazard risks associated with such pollutants. That said, since the project itself will be handling and managing industrial and hazardous wastes, where the potential for environmental and human exposure could lead to adverse and irreversible environmental and human health and safety risks.

**Environmental Risks and Impacts**

The following environmental risks are anticipated during the project implementation stage:

* Construction related works involved with the project would lead to dust, noise and light pollution in the project area and affect the project affected persons, the elderly, children, the pregnant mothers and people with respiratory diseases adversely;
* A good number of plants, vehicles and machinery would be in use during construction of various facilities of the project. This would lead to burning of fossil fuel and use and unsafe disposal of lubricants that would emit CO2, CO and GHG beside polluting soil and ground water.
* Construction related waste, when not disposed properly, would affect the air and water quality of the project area adversely.
* Since the project would support the management of electronic and other wastes, these may pose risks to the environment and public health. There remain residual health risks to the community even after project interventions on the management of such wastes.

**Social Risks and Impacts**

Overall, the project would benefit the greater society and the public health in Bangladesh and people in the project areas in particular by improving air and water quality and effectively managing selected brick kilns, electronic wastes and vehicular pollution and policy reforms and capacity building of DOE. However, the following social risks are anticipated:

* Land acquisition will be required to build environmental offices and laboratories, which will be scattered across various district. Economic and physical displacement along with displacement of informal settlers are likely due to the acquisition. Thus, subsequent livelihood restoration and resettlement may be required.
* During the construction phase, significant number of workers will be employed by the contractors for various civil works most of which will be locally recruited. The impact of the labor issues, including OHS, waste generation and communicable diseases, will be of concern.
* Though GBV/SEA/SH risk is Low, there may be possibility of GBV/SEA/SH in the community.
* New jobs at the local level may increase prevalent gender gaps. Chances of employing child labor cannot be ruled out. The vulnerable and disadvantaged workforce may fall prey to discrimination.
* The waste generated during construction activities will expose communities to health and safety risks especially those communities that are immediately close to the construction sites and along the transport routes for acquisition of goods and materials during the construction and operation phases. This could increase road traffic accidents in the vicinity of the project sites too.
* Pedestrian movement and safety in the subproject areas would be adversely affected by traffic congestion as additional transports would ply carrying construction material, waste/debris transportation to dump site.
* Since the project will deal with wastes, the residual wastes remaining after project intervention may affect the health and safety of the community, including workers.
* Temporary job loss of Brick Kiln workers would take place at the selected traditional Kilns as these adopt the Hybrid Hofman Kiln (HHK) and tunnel kiln technologies at the initial years of project implementation.
* Small ethnic communities residing in the project area could be affected by the project activities. This may demand development of standalone Small Ethnic Community Development Plan (SECDPP).
* The Project is being implemented amidst COVID-19 outbreak, which is likely to affect health of both the workers and the communities. Absence of PPE, not using Mask and Gloves, lack of training on handling a COVID patient, non-compliance of social distancing protocol and lack of awareness etc. would exacerbate the situation.

Notable positive impacts of the project include:

* As DOE would undergo ‘Institutional Reform’, some 622 new posts will be filled up through providing ‘Equal career Opportunity’ by the end of the project implementation. Local unemployed persons irrespective of gender would be able to secure jobs in the project area.
* Besides 30 new district offices and 6 regional/Divisional laboratories would involve construction work at different Division and District HQ creating job opportunity and economic activities linking infrastructural development.
* The brick kiln workers would find job round the year after conversion of ecofriendly kilns. They would also be able to work in a more conducive environmental condition devoid of burning of firewood and Sulphur rich coal.
* As 5 new Vehicle Inspection Centers (VICs) under PPP will be developed along with rehabilitating existing 4 VICs managed by BRTA, job opportunity would be created for a good number of local technical personnel. This would also ease the hassle of the vehicle owners in getting vehicle fitness certificates.
* E-waste processing facility at Kaliakair HTP would process and recycle maximum 100,000 tons of e-waste per annum and segregate metals and plastic. This would create jobs, bring new technologies and would improve the air and surface water quality.
* Effective Citizen engagement, discussion with research organizations and CBOs would raise the acceptance level of the project amongst the general mass.

Overall, the positive social impacts of the project are likely to be substantial compared to negative impacts and risks.

## **1.5** **Purpose and Objectives of the Stakeholder Engagement Plan**

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the construction, other project activities, and operation of the proposed projects. The SEP outlines the ways in which Implementing Agencies (DOE, BB, BRTA, BHTPA) will engage with various stakeholders including development partners, participating financial institutions (PFIs), Research Organizations, labors, and contractors and the local community. The objectives and purpose of SEP are:

* Involves interactions between and among identified groups of people and provides stakeholders with an opportunity to raise their concerns and share their opinions and ensures that this information is taken into consideration when making decisions pertaining to the project.
* Begins early during the project planning process to gather initial views on the project proposal and design.
* Encourages stakeholder’s feedback, especially as a way of informing the project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts.
* 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.
* Supports active and inclusive engagement with project affected parties.
* Is free of external manipulation, interference, coercion, discrimination and intimidation; and
* Ensures that implementation of the SEP will be documented and disclosed prior to Project appraisal.

In addition, SEP of the BEST project will endeavor to disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities. And it will provide stakeholders with access to information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.

## **1.6** **World Bank Requirements for Stakeholder Engagement**

The World Bank’s ESF came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) 10, “Stakeholder Engagement and Information Disclosure”, which recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice”. ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

As defined by the ESF and ESS10, stakeholder engagement is an inclusive process conducted throughout the project lifecycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project’s environmental and social risks. Key elements of ESS10 include:

* Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project.
* PIUs (DOE, BB, BRTA and BHTPA) will engage with concerned stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
* PIUs (DOE, BB, BRTA and BHTPA) will engage in meaningful consultations with all stakeholders. Borrower will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
* The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
* The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

DOE, BB, BRTA and BHTPA would develop SEP proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders would be identified and the SEP would be disclosed for public review and comment as early as possible, before the project is placed for the World Bank appraisal. ESS10 also requires the development and implementation of a grievance redress mechanism (GRM) that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

In view of the COVID 19 outbreak in Bangladesh, the Borrower is also required to comply with World Bank and WHO guidelines along with national guidelines in this regard.

# **Chapter 2: Previous Stakeholder Engagement Activities and Lessons Learned**

## 

## 2.1. **Previous Consultation and Stakeholder Engagement Activities**

There had been a good number of visits, consultations/workshop/discussion at macro and micro level under the auspices of MOEF&CC/DOE (see table 1 below). Due to COVID 19 pandemic, many of the meetings were conducted virtually while some were physically conducted maintain health protocol following national, WHO and Bank protocol on COVID 19.

#### Table 1: Public Consultations and Consultation among Stakeholders

| Date | Venue | No. of Participants | Main points discussed |
| --- | --- | --- | --- |
| 14 January 2020 | Chameli Meeting Room, DoE - Chaired by Director General, Department of Environment | **Representatives from:**  Bangladesh Bank  Bangladesh Brick  Manufacturers and  Owners Association  (BBMOA)  Bangladesh Auto  Bricks  Manufacturers  Association  House Building  Research Institute  Bangladesh Inland  Water Transport  Authority (BIWTA)  Bangladesh  Economic Zones  Authority (BEZA)  Bangladesh Small  and Cottage Industry  Corporation  (BSCIC)  Institute of Water  Modeling (IWM) | Refinancing for installation of environment friendly machineries and devices in cement & re-rolling industries through central bank.  Demonstration projects for non-fired Block Bricks manufacturing with special financial incentives  (i) One auto brick kiln in every upazila  (ii) Conduct comprehensive feasibility study for AAC brickkiln.  (iii) Concessional loan for auto brick kiln and AAC.  Demonstration of Autoclave Aerated Concrete (AAC) Block plants in 7 divisional cities.  (i) Construction of eco-friendly garbage receiving points at major inland  river ports and ferry-crossing stations;  (ii) Construction of facilities for storing garbage including operation;  (iii) Construction of observation tower with modern electronic security facilities;  (iv) Removals of garbage from river bed and transportation for disposal;  (v) Construction of eco-park and plantation along the banks of the river;  (vi) Awareness program (leaflet, poster, miking, street drama, TV scrolling, community consultation, etc.)  Establishment of CETP in Mirsharai Economic Zone  (i) A comprehensive study on waste treatment options and facilities in the existing BSCIC industrial states (there are such 76 states).  (ii) Primarily Central Waste Treatment can be piloted in Gazipur, Tongi and Konabari Industrial States.  (i) People’s participation in pollution management activities.  (ii) Awareness campaign  (iii) Capacity building of implementing agency  (iv) Sludge management of battery recycling industry  (v) Incentives for recycling industries  (vi) Narayanganj-Fatullah CETP |
| 14 January 2021 | Grand Ballroom, Pan Pacific Sonargaon, Dhaka | 81 representatives attending Inception Workshop of BEST Preparation Project:  DNCC, DSCC, BUET, DoE, UNDP, BGMEA, BEZA, MoP, MoIND, MoWR, MoEFCC, BELA, WARPO, Narayanganj City Corp., IMED, BSCIR. BKMEA, CEGIS, ERD, DTCA, BBMOA, DWASA, Bangladesh Bank, DCCF, BFD, BPC, BRTA, DGHS,  Bangladesh auto brick field industry association, Research Organizations and Academicians | 1. Air Quality Improvement  * City Corporations or municipalities should address air pollution through Dust Sucker, Vacuum Type load Sweeper Truck, Water Sprinkler vehicle, Permanent water fountain to manage the Road and Soil dust management, * BRTA will Set up 100 Emission testing Centers and HR Capacity Building * Block production, Tunnel/Auto Brick instead of conventional brick until total phase-out of burnt bricks, Promoting Fly ash-based brick and conduct Study of Alternative Construction Materials to replace burnt brick and Piloting of Alternative construction Materials. * Setting-up Air Quality Laboratory Including Source Apportionment Study facilities including additional manpower in all divisional cities * Air Quality Mapping for the whole Country (sensors, networking, servers and website) * Real time air quality monitoring and weekly/fortnightly forecasting * Real Time industrial air quality monitoring * Air Quality Modelling * Training and Public Awareness * Setting up fuel testing laboratory by BPC in 15 major depos * Conduct Scientific Study for correlating fuel quality with vehicle engine to reduce emission and conduct Study to reduce Sulphur content in fuels produced from ERL * DG Health/NIPSOM will conduct Study on Health Impact of Indoor and Ambient Air Pollution  1. Water Quality Improvement  * Establishment of CETP in Narayanganj BEZA (BSMSN), Karinganj, Narshingdi, 1 Million USD * On-line ETP monitoring * On-line surface and ground water quality monitoring * Pollution Remediation Activities under Kornafuli River Master Plan * Centralized STPs in Divisional city corporations, Gazipur, Narayangonj Cities, etc. * Bangladesh Bank to Provide financial support for setting up ETP, greener tech/4R in Industries * DPHE to set-up soak well, septic tank for on-site sanitation  1. Waste Management  * Municipal Solid Waste management at DNCC, DSCC, NCC, RCC, etc. * Activity to ensure Segregation of waste at source, provide Motivation, provide different colour of bins (combustible and non-combustible) * Setup house-to-house collection system (Chambered Van) * Development of STS * Development of Transportation system (compactors, Arm roll carriers, container carriers, dump truck, backhoe loader, skid loader, pay loader, jet and sucker machine, canal dredging and cleaning machine, floating type excavator) * Purchase of Environment friendly equipment (road sweepers (each for 20 km), water browser 25, Mist sprayer-25, * Development of disposal site * Digital database management for better solid waste management * Medical Waste management by MoHFW * Setup collection of hazardous waste (Hazardous Medical/radioactive) * Establishment of ETP in government health care facility * Purchase of equipment (autoclave/incinerator /shredder/High stock vibrating feeder/covered van) * Initiative for E-waste management by DoE * Upliftment of informal sector to formal sector through PPP model * Massive awareness * Initiative for Hazardous Chemical Waste Management by * Hazardous chemical import, export, manufacturing inventory * Chemical waste disposal facility development at Chittagong port * Initiative to Improvement of Waste Management in the Industrial States by MoInd * construction of Central ETP in Existing BISIC industrial area (Narsingdi/Chittagong/Pabna/Bogra) * Sanitary landfill site development in BISIC (Tangail/Rajshahi) * Recycling of industrial wastewater in the proposed BISIC area (3R strategy * Plastic Waste Management * District Administration will phase out SUP & Multilayer plastic in Hotels, motels and restaurants in coastal areas * BEZA and BGMEA will Establishment of Plastic recycling plant with storage in Economic zone   Institutional Capacity Development   * Expansion of DoE with service excellence of DOE Officials for smooth implementation of overarching role of DOE * Establishment of Central & Regional Laboratories * Training Centre * Centre for Research and Development * Logistics * Training and education at home and abroad * Independent EIA Institute * Relevant Environmental Act, Rules, Policies & Guideline |
| 03 Nov 2021 | Bangladesh Bank HQ | 5 Representatives from Bangladesh Bank | * With the support of DPs, the BB has developed its green financing program. Led by its SFD and with technical support of IFC, the BB issued its Green Banking Policy Guidelines for Banks (2011) and for Non-Bank Financial Institutions (NBFIs) and new banks (2013) and Sustainable Finance Policy for Banks and Financial Institutions (2020). * Positive results of the green CGS will help the GOB scale up and formalize this pilot as a critical component of its green financing ecosystem * The BB’s efforts have helped many industrial firms invest in green equipment and technology and specifically the brick sector to adopt advanced production technologies and thus generated significant positive social economic and environmental benefits * Brick technologies to be supported by the green CGS are identified through the experience of the DOE and BB in the successful implementation of DP-financed projects (including the CASE Project), international reviews of brick technology development, and technical analyses of the sector’s development trends. * Slow adoption of green technologies for brick and other high-polluting sectors under existing green refinancing schemes due to weak enforcement, risk concerns and limited technical knowledge * The main reasons for the slow switch to less polluting brick production technologies include * Low awareness among fired bricks producers about non-fired bricks technologies; * Small-scale nature of brick production and preference for low-tech, simpler, and cheaper options that kiln operators are familiar with; * The fear of low demand for non-fired bricks combined with high investment costs for improved technological solutions (including the necessity for year-round employment) and financing issues; * Low availability, hence high costs of high land that would allow year-round operation; * Potential issues with the supply of raw materials (for example, coal) as they are imported seasonally and show price volatility in the domestic market; * Uneasy access to natural gas supply that could potentially remove the serious coal environmental footprint in the sector; * The somewhat complicated and frequently unclear or arbitrary taxation and environmental rules that discourage investment in new technologies and increase the risk factor. * Based on experts’ advice, two non-fired brick technologies and one improved fired clay brick technology have been chosen as potentially viable implementation and cost-benefit analysis validation options. * The two non-fired brick technologies assessed are AAC blocks technology and SLB technology. The third assessed intervention considered the improved fired clay bricks production of tunnel kilns. While the tunnel kiln technology will still produce fired clay bricks, it is characterized by much lower environmental pollution and year-round production. * The project is expected to deliver economic benefits that will positively influence society and the country’s economy. The main gains will manifest in the form of environmental and health benefits associated with lower pollution from the bricks sector * Implementing the proposed BEST Project interventions, especially introducing modernized and more environmentally friendly bricks producing technologies, is expected to decrease air pollution discharges from critical sources in Bangladesh. |
| 04 Nov 2021 | Brick fields at the outskirts of Dhaka | 40 Brickfield workers | * Current fire brick sector workers aware about the severe environmental damage due to this current practice, which have potential negative impacts on their health, population’s health around the area, and occupational hazards. They want better job environment and job profile. * Due to pollution control, a number of brick field is sealed which impact on their livelihood due to lack of other employment opportunities   Current fired bricks sector employees (for example, firemen) are afraid of losing their jobs and spreading untrue information of the inefficiency and inferiority of new technologies |

## **2.3. Lessons Learned from Former Stakeholder Engagement Activities**

BEST project involves four Implementing Agencies (IAs - DOE, BB, BRTA and BHTPA) and the stakeholders for each IA also vary widely. The IAs have contacted their relevant stakeholders physically and virtually following COVID 19 protocols and have received various inputs. In the process, the IAs have learnt certain lessons, which are given below:

* The IAs must continue to engage the stakeholders from the early stage of the project development process and maintain this two-way connectivity as an integral part in project design, decision making, management and monitoring of the project.
* As the project components are diverse and different for each IA, it is important that the IAs identify the project affected persons (PAP) and the vulnerable groups pertinent to their component precisely.
* It is important for the senior officials of the IAs (who are particularly involved with designing the project) to understand the needs and concerns of the PAP and the vulnerable groups (those would become vulnerable owing to the project) and how to address their plight in terms of livelihood restoration and be able to benefit from the project;
* Whenever there is a scope of creating jobs for the unskilled laborers from the local PAPs and the vulnerable groups, that must include women, the marginalized and the ethnic communities, when available. The matter is more pronounced with 20-30 Brick Kilns where the existing workers would lose job temporarily/permanently including women laborers due to modernization of the kilns. However, the modernization would also need laborers and the existing workers should be accommodated as far as possible. Workers desire safe working environment and higher pay.
* There would be lot of construction work under DoE in many of the 30 districts and 6 Region/Division HQs. DoE could seek help of the Local Administration, local political leadership and the project contractors, who form an effective team in identifying the needy ones from the locality and assist in job creation so to support their livelihood. Contractual obligation should include relevant clauses for the adherence of the contractors involved in construction activities;
* Information, Education and Communication (IEC) by the IAs will go a long way in aligning public perception in favor of the project. The IAs need to have a strong PR mechanism and use all available resources including print and electronic media, FGD, Web-based information and social media to propagate project related information.
* The ethnic communities are very important stakeholder in any World Bank financed project. The IAs must ensure that continuous consultation is done the ethnic communities being cognizant with cultural differences. Project activities requiring Free, Prior Informed Consent (FPIC) will be avoided.
* Virtual Meeting with the stakeholders is an effective alternative to physically meeting large group of stakeholders under COVID 19 pandemic situation.
* Closing the feedback loop is important—the stakeholders must know how their inputs have been taken in to project design.
* Under a pandemic situation like the ongoing COVID-19 outbreak, the IAs should ensure that WHO and Ministry of Health (MoH) protocols of COVID 19 pandemic including all precautionary measures like use of PPE, compliance of social distancing protocol, using Mask and Gloves, training on handling a COVID patient, and social awareness amongst its health workers and the community are followed by the contractors while implementing the project. The Contractual obligation should include these clauses for adherence by the contractors.

# **Chapter 3: Stakeholder Identification and Analysis**

## **3.1 Stakeholder Categorization, Identification and analysis**

Stakeholder engagement process for the ‘Bangladesh Environmental Sustainability and Transformation (BEST) project’ has started from identification, mapping and analysis. It is anticipated that this SEP will help clarify the stakeholder identification procedure at the project level.

For the purposes of effective and tailored engagement, stakeholders of the BEST project can be divided into the following core categories:

**Affected Parties:** Persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;

**Other Interested Parties:** Individuals/groups/entities that may not experience direct impact from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and

**Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status[[3]](#footnote-3), and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project and will enable the project to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community’s and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

A general list of stakeholder groups and interested parties identified along with their influence and interest is presented in **Table 2** below. SEP being a live document and new stakeholders, whenever identified, would be included in the list as and when necessary.

**Table 2: Potential Stakeholders, Other Interested Parties; their Influence and Interest in the Project**

|  |  |  |  |
| --- | --- | --- | --- |
| **Component** | **Stakeholder** | **Influence** | **Interest** |
| **Project Affected People** | | | |
| **1 - Environmental governance and Infrastructure**    1.1 Regulatory Reform  1.2 Institutional Reforms  1.3 Environmental Infrastructure  1.4 Capacity Building  1.5 Project Management of MoEFCC/DOE activities | General Public including women representatives, who are most adversely impacted by climate change and environmental pollution in the whole country in general and project area in particular.  Women, adolescents and minor children may fall prey to GBV/SEA/SH, STD and GBV related incidents due to presence of migrant workers at various subproject sites where district level DoE offices/Regional Laboratories are planned to be developed.  People impacted by economic and physical displacement including informal settlers | Low | Low |
|  |  |  |  |
| 2 – **Green Financing**  2.1 Green Credit Risk Guarantee (CGS)  2.2 Environment Fund | Workers in the selected Brickfields including women, adolescent girls, members of the marginalized community working in the brick kiln and their family members.  Shopkeepers, restaurant owners etc. beside the Brick Kilns whose business in primarily dependent on the Brickfield Workers. | Low | Low |
|  |  |  |  |
| 3 – **Vehicle Emission Inspection**  3.1 Vehicle Inspection  3.2 Technical Assistance  3.3 Project management at BRTA | Private and Commercial Vehicle Owners under the jurisdiction of the VTCs planned.  Different Transport Owners and Transport Workers Association plying commercial vehicles under the jurisdiction of the VTCs planned. | Low | Low |
|  |  |  |  |
| 4 – **E-waste Management Infrastructure**  4.1 Pilot E-waste Management Infrastructure  4.2 Technical Assistance  4.3 Project Management | Individuals including women, members of the minority community/groups who are directly involved with collection, dismantling, sorting, recycling and transportation of E-Waste from source areas to the Pilot E-waste Management Infrastructure at Kaliakair HTP.  Scavenger that collect the E-waste items from landfills and open dustbins for recycling and the buyer Chain of the E-waste recyclable goods. | Low | Low |

|  |  |  |  |
| --- | --- | --- | --- |
| **Other Interested Parties** | | | |
| **1 - Environmental governance and Infrastructure**    1.1 Regulatory Reform  1.2 Institutional Reforms  1.3 Environmental Infrastructure  1.4 Capacity Building  1.5 Project Management of MoEFCC/DOE activities | Ministry of Finance   * Finance Division, * Banking Division,   Planning Commission  Economic Relations Division  Ministry of Environment, Forest and Climate Change (MOEFCC)  Department of Environment (DOE)  Ministry of Road Transport and Bridges (MORTB)  Ministry of Local Government, Rural Development and Cooperatives (MOLGRDC)  Ministry of Posts, Telecommunications and Information Technology (MOPTI)  Prime Minister’s Office (BEZA)  Ministry of Law, Justice and Parliamentary Affairs  Parliamentary Committee on Environment, Forest and Climate Change  Bangladesh Civil Services (BCS)  CBOs/ Think Tank on Environmental Issues  Media  BUET  EQMS Consulting Limited  Bangladesh Council of Scientific and Industrial Research (BCSIR)  International Union for Conservation of Nature and Natural Resources (IUCN)  Research Organizations and other Universities working on Environmental issues  Local NGOs working on HR, Gender, Labor, Environment and Waste Management including Medical Waste: Waste Concern, PRISM Bangladesh, Geocycle Bangladesh etc.  Job seekers for employment in DOE that include the disabled, women, members of the minority and the transgender community.  All type of Industries and Factories that emit pollutants in the country and their Associations (BGMEA, BKEMA, REHAB, Tannery Association, Paint production and Dyeing Industries, Insecticide/pesticide Industries, Brick Kilns, Stone Crushing Industries, Cement Factories, Steel Re-rolling Mills, Ship Breaking Industries, Tobacco Companies etc.  WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO) | High  Low  High  Low  Low  High  High | High  High  High  High  High  High  High |
| 2 – **Green Financing**  2.1 Green Credit Risk Guarantee (CGS)  2.2 Environment Fund | MOF  Planning Commission  MOEFCC  DOE  Selected Eligible Brick kilns ready for HHK and Tunnel Kiln Modification  Bangladesh Brick Manufacturing Owners Association (BBMOA)  Bangladesh Auto Brick Manufacturers Association (BABMA)  Brickfield Workers Association in the project locations  National/International Vendors and Contractors  Coal Exporters, Suppliers and transport sector people including owners, drivers and laborers involved in transporting Coal and fire wood to the Brick Kilns   1. General public, targeted consumers, Consumer Groups   Industrial Associations  Media Outlets, civil society  NGOs/CBOs working on Labor, Gender and Community health Issues  BUET  Bangladesh Housing and Building Research Institute  EQMS Consulting Limited  Bangladesh Council of Scientific and Industrial Research (BCSIR)  International Union for Conservation of Nature and Natural Resources (IUCN)  Local NGOs working on HR, Gender, Labor, Environment and Waste Management.  Research Organizations and other Universities working on Environmental issues  Bangladesh Bank   * Credit Guarantee Unit * Sustainable Finance Department (Technical Oversight)   5-10 Selected Participating Financial Institutions (PFI) | High  Low  Low  Low  Low  High  High | High  High  High  High  High  High  High |
| 3 – **Vehicle Emission Inspection**  3.1 Vehicle Inspection  3.2 Technical Assistance  3.3 Project management at BRTA | Ministry of Finance  MOEFCC  DOE  PPP Partners responsible for developing 5 new Vehicle Inspection Centers  BRTA  Dhaka Transport Coordination Authority (DTCA)  Dhaka Transport Coordination Board (DTCB)  Roads and Highways Department  Dhaka Metropolitan Police (Traffic Division)  National/International Vendors and Contractors  Local community and businessmen  Media  NGOs/CBOs working on Labor, Environment and Community health Issues  Research Organizations and other Universities working on Environmental issues  WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO) | High  High  Low  Moderate  High | High  High  High  High  High |
| 4 – **E-waste Management Infrastructure**  4.1 Pilot E-waste Management Infrastructure  4.2 Technical Assistance  4.3 Project Management | MOF  MOLGRD&C  MOEFCC/DOE  MOPT&IT  PM’s Office (BEZA)  BHTPA  PPP partners involved with E-waste management facility at Kaliakair HTP  and other HTPs managed by BHTPA across the country  National/International Vendors and Contractors and Local Businessmen interested to have a share in the contract of developing E-waste management Facility  General Public  Producers, dealers, collection centers, refurbishing companies, dismantlers, recyclers, auctioneers, consumers and bulk consumers involved in the sale, purchase and processing of electrical and electronic equipment or components  Bulk users of electronic gadgets namely Military, Para military and Intelligence Organizations, Civil Aviation Authority, mobile phone companies, embassies, Hotels, Commercial Banks, ICT gadget/mobile phone manufacturers, Service sector including Hotels and Tourism, E-Commerce entities, manufacturers, Hospitals and diagnostic Centers, large shopping malls selling computers, mobile phones etc. at Eastern Plaza, Banani DCC Market, Elephant Road, BCS Computer City at Agargaon, Cineplexes, and other users of computers, radio frequency items, radar, mobile phones, jammers and other electronic generating E-waste  BUET  EQMS Consulting Limited  Research Organizations and other Universities working on Environmental issues  Bangladesh Council of Scientific and Industrial Research (BCSIR)  International Union for Conservation of Nature and Natural Resources (IUCN)  Media  NGOs/CBOs working on HR, Gender, Labor, Environment and Community health Issues  Local NGOs working on Waste Management  WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO), Norwegian Embassy, UNIDO, GIZ, UNDP | High  Low  Low  Low  Low  High  Low  High | High  High  Low  High  Low  High  Low  High |
| 5.  **Contingency Emergency Response Component** **(CERC)** | MOF, MOEFCC/DOE, BB, BRTA, BHTPA, PFIs, PPP Partners  WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO), Norwegian Embassy, UNIDO, GIZ, UNDPs | High | High |

## **3.3 Vulnerable Groups**

A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable entities/individuals in public consultations and other engagement forums established by the project. The vulnerability may stem from person’s origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, In the business community vulnerability may stem from not being treated fairly by the competent authority responsible for allotting contract, political pressure of not to submit tender documents, threatening with thugs/ political activists and asking for bribe by the relevant GoB officials in return of contract etc.

Engagement with the vulnerable groups and individuals often require the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process commensurate to those of the other stakeholders.

In the context of the BEST project, vulnerability stems of persons/entities involved directly with the implementation of various component and subcomponents of the project.

At the Brick Kilns women workers are plenty and as the conversion of existing zigzag tunnel Kilns take place at selected Kilns, there are chances of GBV/SEA/SH, STD and GBV/SEA/SH related incidents due to presence of migrant workers. This could be intensified further as kiln workers may lose jobs temporarily while the conversion is taking place and women may fall victim of sexual violence from their unemployed family members. In the same note many a local worker including women and members of the LGBTQ+C community could be employed by the contractors in the construction sites all over Bangladesh and there could be rise in the cases of GBV/SEA/SH, STD related incidents due to presence of migrant workers. Aspirant job seekers including women, members of the ethnic community and transgender community may fall victim of political/ other discrimination and their competence may be ignored and less qualified ones could be given with jobs.

#### Vulnerable groups adversely affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement including face-to-face meetings, FGD, public consultations etc. that will be undertaken by the project is provided in the following sections. Identified Vulnerable or disadvantaged stakeholders, their needs and their preferred means of notification/ consultation are given at Table 3.

**Table 3. Vulnerable or disadvantaged stakeholders and their needs**

|  |  |  |  |
| --- | --- | --- | --- |
| Project component | Vulnerable Groups and Individuals | Characteristics/ Needs | Preferred means of notification/ consultation |
| Component 1: Environmental governance and Infrastructure  1.1 Regulatory Reform  1.2 Institutional Reforms  1.3 Environmental Infrastructure  1.4 Capacity Building  1.5 Project Management of MoEFCC/DOE activities | The VG in this component include:  a. 622 job seekers for employment in DOE that would include the disabled, women, members of the tribal community and members of the transgender community.  b. Women, in general, who may fall prey to GBV/SEA/SH, STD related incidents due to presence of migrant workers at various subproject sites where district level DoE offices/Regional Laboratories are planned to be developed.  c. People impacted by economic or physical displacement, including informal settlers. | a. Giving job seekers a fair chance to compete for the job based on competence and not political/ other affiliation.  b. Contractors to develop project centric Labor and GBV Action Plan, appraise the workers on the issue and maintaining strict Labor camp discipline with respect to entry and exit of the labors at the labor Camp. | a. Web based Circulation;  b. Notification through daily newspapers, social media; and  c. FGD, One-on-One meeting, formal meeting, discussion with the workers, Kiln owners etc. maintaining COVID 19 protocol. |
| Component 2: Green Financing  2.1 Green Credit Risk Guarantee (CGS)  2.2 Environment Fund | a. Workers of the selected brick kilns, particularly women who may lose job temporarily as transformation would take time and during that period no brick would be produced.  b. Women/minor children including adolescent girls working/residing at the selected brick kilns/ in the vicinity may fall prey to GBV/SEA/SH, STD related incidents due to presence of migrant workers involved with transformation work of the kilns. | a. Taking maximum laid off workers including women workers of the selected kilns in the transformation project so not to affect their livelihood negatively.  b. Contractors to develop project centric Labor and GBV Action Plan, appraise the workers on the issue and maintaining strict Labor camp discipline with respect to entry and exit of the labors at the labor Camp. | FGD, One-on-One meeting, formal meeting/discussion etc. with the Brick Kiln owners, their organizations, Kiln workers association following COVID 19 related health protocol. |
| Component 3: Vehicle Emission Control  3.1 Vehicle Inspection  3.2 Technical Assistance  3.3 Project management at BRTA | Private and Commercial Vehicle Owners and different Transport Owners and Transport Workers Association who could be victims of corruption/ harassment by BRTA staffs at the Vehicle Inspection Centers | a. Stringiest action by BRTA against staffs at the Vehicle Inspection Centers involved with corruption/harassment. | a. Web based Circulation;  b. Notification through daily newspapers, social media; and  c. FGD, formal meeting etc. with the relevant PPP partners involved with new VICs following COVID 19 related health protocol. |
| Component 4:  E-waste Management Infrastructure  4.1 Pilot E-waste Management Infrastructure  4.2 Technical Assistance  4.3 Project Management | a. Individuals including women, members of the minority community/groups who would directly be involved with collection, dismantling, sorting, recycling and transportation of E-Waste from source areas to the Pilot E-waste Management Infrastructure at Kaliakair HTP.  b. Scavenger that collect the E-waste items from landfills and open dustbins for recycling and the buyer Chain of the E-waste recyclable goods  c. Workers including women, members of the minority community and staffs at the Pilot E-waste Management Infrastructure at Kaliakair HTP who would deal with E-waste. | a. Use of appropriate PPE by the persons involved with E-waste management.  b. Arrangement of OHS measures at the work station including awareness by the workers on measures to be taken including ambulance service, hospitalization etc. whenever a crisis occurs. | a. FGD/Discussion/meeting with the vendors who are involved with E-waste collection and business and employ manpower for e-waste collection and recycling to make them aware of the hazards of E-waste and requirement of PPE for the workers including OHS measures.  b. Such meeting to be arranged following COVID 19 related health protocol. |
| Component 5:  Contingency Emergency Response Component (CERC) | All components would be able to gain rapid access to bank financing to respond to an eligible crisis or emergency that causes major adverse economic and/or social impacts. | Crisis or emergency that causes major adverse economic and/or social impacts in any of the components or subcomponents thus affecting a particular group of stakeholders | FGD, One-on-One meeting, formal meeting, discussion etc. with DoE, BB, BRTA, BHTPA and relevant PPP partners, PFIs, and related Contractors/ suppliers following COVID 19 related health protocol. |

# **Chapter 4: Stakeholder Engagement Methods and Program**

## 

## **4.1 Stakeholder Engagement Methods and Tools.**

This chapter describes stakeholder engagement activities that will be implemented by Implementing Agencies for various activities tailored to the specific component and subcomponent of the project phases as well as the on-going routine engagement.

Due to the nature of the activities, the project intends to utilize various methods of engagement that will be used by as part of its continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of various techniques needs to be applied that are specifically tailored to the identified stakeholder groups. As various specific stakeholders are being identified, methods used for consulting with statutory officials may be different from a format of liaising with the local communities, interested groups and international stakeholders.

The format of every consultation activity should meet general requirements on accessibility, i.e. *should be held at venues that are easily reachable and do not require long commute, entrance fee or preliminary access authorization, cultural appropriateness (i.e. with due respect to the local customs and norms), and inclusiveness*, i.e. engaging all segments of the local society, including disabled persons, the elderly, the small ethnic communities and other vulnerable individuals. If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the project.

The Project should ensure the participation of vulnerable individuals and groups in project consultations that may require the implementation of tailored techniques. Since their vulnerable status may lead to people’s hesitancy and reluctance or physical incapacity to participate in large-scale community meetings, visiting such individuals/ families at their homes or holding separate small group discussions with them at an easily accessible venue is a way for the project to reach out to the groups who, under standard circumstances, are likely to be insufficiently represented at community gatherings. Attention to local dialect in oral communication must be given in consideration to the type of stakeholders being addressed.

#### Table 4: SEP Techniques

|  |  |
| --- | --- |
| Engagement Technique | Appropriate application of the technique |
| Correspondences (Phone, Emails, Text, instant messaging) | Distribute information to Implementing Agencies/PIU officials and other related government agencies, Research Organizations, PPP Partners, PFIs, CSO and Professional Organizations, INGOs/NGOs, Local Government, and other relevant Stakeholders organizations/agencies |
| One-on-one meetings | Seeking views and opinions  Enable stakeholder to speak freely about sensitive issues  Build personal relationships  Record meetings |
| Formal meetings | Present the Project information to a group of stakeholders  Allow group to comment – opinions and views  Build impersonal relation with high level stakeholders  Record discussions |
| Public meetings/workshop | Present Project information to a large group of stakeholders, especially communities  Allow the group to provide their views and opinions  Build relationship with the communities, especially those impacted  Distribute non-technical information  Facilitate meetings with presentations, PowerPoint, posters etc.  Record discussions, comments, and questions. |
| Focus group meetings | Present Project information to a group of stakeholders  Allow stakeholders to provide their views on targeted baseline information  Build relationships with communities  Allow small groups of people (women, youth, vulnerable people, disabled people, small ethnic communities, Tourists etc.) to provide their vieIws and opinions  Record responses |
| Project on website/Information Centre/information Boards | Establish Information Board in each project area  Present project information and progress updates  Disclose ESIA, ESMP, draft SEP and other project documents |
| Direct communication with affected people | Share information on timing of project activities  Collect the opinion about the project |
| Radio/TV emissions/media | Arrange for broadcast Radio/TV emissions and local/national newspaper to bring the project for large public awareness. |
| Project information on site | Share information on project activities  Provide information on construction materials that will be needed to incite potential suppliers |
| Project leaflet | Brief project information to provide regular update  Site specific project information in local language |
| Surveys | Gather opinions and views from individual stakeholders  Gather baseline data and develop database for monitoring impacts  Record data and analysis |
| Virtual Meeting | Under COVID 19 pandemic situation, virtual meetings are effective mechanisms and are widely used for stakeholder consultation |
| Social Media/ Mobile Telephone | Social media, bulk SMS in mobile phone could be another effective way of communication with the stakeholders, particularly under COVID 19 pandemic. |
|  |  |

**4.2** **Engagement Method and Tools in light of COVID 19 Outbreak**

With the spread of COVID-19, people have been mandated by WHO and national 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. 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.

WHO has issued technical guidance in dealing with COVID-19, including: (i) **Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii)** Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Taking into account the importance of confirming compliance with national law requirements, below are some suggestions for stakeholder consultation amidst COVID-19 outbreak:

* Identify and review planned activities under the project requiring stakeholder engagement and public consultations.
* Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders.
* Assess the level of risks of the virus transmission for these engagements, and how restrictions that are in effect in the country / project area would affect these engagements.
* Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines.
* Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, specific channels of communication that should be used while conducting stakeholder consultation and engagement activities 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;
* Be sure that everyone involved in stakeholder planning articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
* 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 to 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;
* Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
* However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, IA should discuss whether the project activity can be rescheduled to a later time. Where it is not possible to postpone the activity or where the postponement is likely to be for more than a few weeks, IA should consult WB Teams to obtain advice and guidance.

**4.3 Description of Information Disclosure Methods**

As a standard practice, the Project materials (ESMF, ESCP, SEP) released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently documented by the PIUs in a formal manner. PIUs will continue applying the similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development. PIUs would manage a web-based platform, which will be developed to track the project’s progress based on the Results Framework. A link to this web-based platform should be specified on all the printed materials distributed to stakeholders. The platform will support a participatory M&E, which will allow project stakeholders—such as the PFIs, BB, MoF, BRTA, MoRTB, MoPTI, BHTPA, MoEFCC and DOE officials, and consultants—to collect data on project progress. The M&E system will be used to take corrective actions, improve coordination, and facilitate learning throughout project implementation.

The executive summary of ESMF, ESIA, ESMP in Bangla, and English will be made available for public review in accordance with the World Bank and standard international requirements. The SEP will also be released in the public domain simultaneously with the ESMF and ESMP reports and will be available for stakeholder review.

Distribution of the disclosure materials in relation to various component/subcomponent will be through making them available online using the existing websites of PIUs besides dedicate project website managed by DOE. Upon improvement of the COVID 19 situation, distribution of the disclosure material will be through making them available at venues and locations frequented by the relevant Project Affected Parties (PAPs) and larger society and places to which public have unhindered access in the usual manner. Distribution of the disclosure materials (free printed copies of the ESMF/ESMPs in Bangla and English and other related documents) will be through making them available at following venues and locations frequented by the community and places to which public have unhindered access:

* The PIUs main Offices at Dhaka;
* All important public places, local administration offices where various subcomponents of the project would be implemented;
* Selected Brick Kilns, HTPs, BRTA Service Centers, BB offices all over the country, DC’s office in 30 District HQs where new District level offices are planned, 6 Divisional HQ where Regional/Divisional laboratories are planned etc.; and
* Other designated public locations to ensure wide dissemination of the materials.

In view of the spread of COVID 19 pandemic all over the country including the project area, only digital, internet, social media etc. will be followed where face to face interaction with stakeholders can be avoided until COVID-19 situation improves. Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc. Comments are generally received from stakeholders orally or in the written form at the project level. However, due to COVID-19 outbreak and spread, comments should now be received through other means avoiding physical interactions (telephone, email etc.).

Electronic copies of the ESMF, ESMP and SEP will be placed in the project website. 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. The mechanisms that will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of the aforementioned disclosed materials to local and national NGOs as well as other interested parties. Limitation of this online based communication is that not all parties/stakeholders have access to the internet/the knowhow to communicate online.

## **4.4 Timetable for Disclosure**

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The disclosure process associated with the release of project E&S appraisal documentation, as well as the accompanying SEP will be implemented within the following timeframe:

* Placement of the ESMF (including ESMP, ESIA and ESCP), and SEP in public domain – Dates to be confirmed by concerned PIU;

* Public consultation meetings in project affected communities and with other stakeholders to present and discuss findings of the ESMF and measures proposed in the ESMP - Dates to be confirmed by concerned PIU;
* Addressing stakeholder feedback received on the entire disclosure package - Dates to be confirmed by concerned PIU.

The SEP will remain in the public domain for the entire period of project development. It is a live document and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project’s evolving environment.

The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table below provides a description of recommended stakeholder engagement and disclosure methods to be implemented during stakeholder engagement process.

#### Table 5: Stakeholder Engagement and Disclosure Methods

| Stakeholder Group | Disclosure Method |
| --- | --- |
| Project Affected persons, implementing Contractors, business entities, beneficiaries of  the project and  General Population | * Public notices. * Electronic publications (in Bangla and English languages) and press releases on the DOE Project website. * Dissemination of hard copies (in Bangla and English languages) at designated public locations. * Press releases in the local media. * Public Meetings after COVID 19 pandemic is over * Consultation meetings maintaining Health protocol. * Information leaflets and brochures (in Bangla and English languages). * Separate focus group meetings with vulnerable groups, as appropriate. |
| Research Organizations, NGOs, CSOs and CBOs in at the national and sub-national level | * Public notices (in Bangla and English languages). * Electronic publications and press releases on the project website. * Dissemination of hard copies at designated public locations. * Press releases in the local media (in Bangla and English languages). * Consultation meetings. * Information leaflets and brochures (in Bangla and English languages) * Virtual Meetings, FGD and EII etc. |
| Relevant GoB Ministries/ BB,  BRTA, BHTPA and other related authorities | * Dissemination of hard copies of the ESMF, ESMP, and SEP developed by IAs at sub project sites, Divisional and District HQs, municipal and local administration, Press Club etc. * Virtual Meetings |
| Related businesses and enterprises | * Electronic publications and press releases on the Project website. * Information leaflets and brochures. * Procurement notifications. |
| Project Employees including contractor and subcontractor and Labor Force | * Staff Handbook. * Email updates covering the Project staff and personnel. * Regular meetings with the staff maintaining health protocol. * Posts on information boards in the offices and on site. * Reports, leaflets. |

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## **4.5 Planned stakeholder engagement activities**

Stakeholder engagement activities will need to provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them. **Table 6** presents the stakeholder engagement activities PIUs will undertake for the project. The activity types and their frequency are adapted to the three main project stages: project preparation (including design, procurement of contractors and supplies), construction, and operation and maintenance.

#### Table 6: Stakeholder Engagement Activities

| Stage | Target stakeholders | Topic(s) of Engagement | Method(s) used | Location/frequency | Responsibilities |
| --- | --- | --- | --- | --- | --- |
| Stage 1: Project preparation (Project design, Scoping, ESMF/ESCP/SEP Disclosure) | **Component 1:** **Environmental Governance**  Ministry of Finance   * Finance Division, * Banking Division, * Economic Relations Division   Ministry of Environment, Forest and Climate Change (MOEFCC)  Department of Environment (DOE)  Ministry of Road Transport and Bridges (MORTB)  Ministry of Local Government, Rural Development and Cooperatives (MOLGRDC)  Ministry of Posts, Telecommunications and Information Technology (MOPTI)  Prime Minister’s Office (BEZA)  Ministry of Law, Justice and Parliamentary Affairs  Parliamentary Committee on Environment, Forest and Climate Change  Bangladesh Civil Services (BCS)  CBOs/ Think Tank on Environmental Issues  Media  BUET  EQMS Consulting Limited  Bangladesh Council of Scientific and Industrial Research (BCSIR)  International Union for Conservation of Nature and Natural Resources (IUCN)  Research Organizations and other Universities working on Environmental issues  Local NGOs working on HR, Gender, Labor, Environment and Waste Management including Medical Waste: Waste Concern, PRISM Bangladesh, Geocycle Bangladesh etc.  WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO)  General Public including women representatives, who are most adversely impacted by climate change and environmental pollution  All type of Industries and Factories that emit pollutants in the country and their Associations (BGMEA, BKEMA, REHAB, Tannery Association, Paint production and Dyeing Industries, Insecticide/pesticide Industries, Brick Kilns, Stone Crushing Industries, Cement Factories, Steel Re-rolling Mills, Ship Breaking Industries, Tobacco Companies etc.  **Component 2: Green Financing**  MOF  Planning Commission  MOEFCC/DOE  BB  Selected Eligible Brick kilns ready for HHK and Tunnel Kiln Modification  Bangladesh Brick Manufacturing Owners Association (BBMOA)  Bangladesh Auto Brick Manufacturers Association (BABMA)  Brickfield Workers Association  Workers in the selected Brickfields and their family members  National/International Vendors and Contractors  Coal Exporters, Suppliers and transport sector people including owners, drivers and laborers involved in transporting Coal and fire wood to the Brick Kilns  Petty shopkeepers, restaurant owners etc. beside the Brick Kilns whose business in primarily dependent on the Brickfield Workers   1. General public, targeted consumers, 2. Industrial Associations   Media Outlets, civil society  NGOs/CBOs working on Labor, Gender and Community health Issues  BUET  Bangladesh Housing and Building Research Institute  EQMS Consulting Limited  Bangladesh Council of Scientific and Industrial Research (BCSIR)  International Union for Conservation of Nature and Natural Resources (IUCN)  Local NGOs working on HR, Gender, Labor, Environment and Waste Management.  Research Organizations and other Universities working on Environmental issues  Bangladesh Bank  Credit Guarantee Unit  Sustainable Finance Department (Technical Oversight)  5-10 selected Participating Financial Institutions (PFI)  Selected Technical Institute identified to support the Brick Kiln Green CGS Scheme  WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO)  International and domestic donors of Environment Fund  **Component 3: Vehicle Emission Inspection**  Ministry of Finance  MOEFCC  DOE  PPP Partners responsible for developing 5 new Vehicle Inspection Centers  BRTA  Dhaka Transport Coordination Authority (DTCA)  Dhaka Transport Coordination Board (DTCB)  Roads and Highways Department  Dhaka Metropolitan Police (Traffic Division)  Private and Commercial Vehicle Owners  Different Transport Owners and Transport Workers Association  National/International Vendors and Contractors  Local community and businessmen  Media  NGOs/CBOs working on HR, Gender, Labor, Environment and Community health Issues  Research Organizations and other Universities working on Environmental issues  WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO)  **Component 4: E-waste Management Facility**  MOF  MOLGRD&C  MOEFCC/DOE  MOPTI  PM’s Office (BEZA)  BHTPA  PPP partners involved with E-waste management facility at Kaliakair HTP  and other HTPs managed by BHTPA across the country  National/International Vendors and Contractors and  Local businessmen interested to have a share in the contract of the E waste Management Facility  General Public and local community in the sub-project areas  Producers, dealers, collection centers, refurbishing companies, dismantlers, recyclers, auctioneers, consumers and bulk consumers involved in the sale, purchase and processing of electrical and electronic equipment or components  Bulk users of electronic gadgets namely Military, Para military and Intelligence Organizations, Civil Aviation Authority, mobile phone companies, embassies, Hotels, Commercial Banks, ICT gadget/mobile phone manufacturers, Service sector including Hotels and Tourism, E-Commerce entities, manufacturers, Hospitals and diagnostic Centers, large shopping malls selling computers, mobile phones etc. at Eastern Plaza, Banani DCC Market, Elephant Road, BCS Computer City at Agargaon, Cineplexes, and other users of computers, radio frequency items, radar, mobile phones, jammers and other electronic generating E-waste. Similar entities at the Division and District HQs are also to be considered  Scavenger that collect the E-waste items from landfills and open dustbins for recycling and the buyer Chain of the E-waste recyclable goods  BUET  EQMS Consulting Limited  Research Organizations and other Universities working on Environmental issues  Bangladesh Council of Scientific and Industrial Research (BCSIR)  International Union for Conservation of Nature and Natural Resources (IUCN)  Media  NGOs/CBOs working on HR, Gender, Labor, Environment and Community health Issues  Local NGOs working on Waste Management  WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO), Norwegian Embassy, UNIDO, GIZ, UNDP  **Component 5: Contingency Emergency Response Component** **(CERC)**  MOF, MOEFCC/DOE, BB, BRTA, BHTPA, PFIs, PPP Partners  WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO), Norwegian Embassy, UNIDO, GIZ, UNDP | ESMF, ESIA, ESCP, SEP; Project scope and rationale; Project Design; Project E&S principles; Grievance mechanism process | Correspondences (Phone, Emails, Text, instant messaging) for normal communication  Face-to-face meetings maintaining health protocol;  Formal Meetings maintaining health protocol;  FGD, KII with the research Entities maintaining health protocol;  One-on-one meetings maintaining health protocol;  Virtual Meeting  Public meetings for Component 2 and 3 - separate meetings for women, the disabled and the vulnerable group basing on social norm of the project area while maintaining health protocol;  Discussion in Radio/TV emissions/media on the project  Using the web based social media communication means;  Disclosure of written information: brochures, posters, flyers in Bangla, website Information boards or desks  Grievance mechanism  Local newspaper  Face-to-face meetings maintaining health protocol;  Formal Meetings with PFIs and Selected Technical Institute identified to support the Brick Kiln Green CGS Scheme  maintaining health protocol;  Public Meetings with the selected Brick kiln owners, their associations and workers association etc. maintaining health protocol;  FGD, KII with the research Entities maintaining health protocol;  One-on-one meetings maintaining health protocol;  Virtual Meeting  Disclosure of written information: brochures, posters, flyers in Bangla, website Information boards or desks  Grievance mechanism  Local newspaper  Face-to-face meetings maintaining health protocol;  Formal Meetings with PPP Partners, DTCA, DTCB, and small-scale public meetings with different Transport Owners and Transport Workers Association maintaining health protocol;  FGD, KII with the research Entities maintaining health protocol;  One-on-one meetings with WB and PPP partners maintaining health protocol;  Virtual Meeting  Disclosure of written information: brochures, posters, flyers in Bangla, website Information boards or desks  Grievance mechanism  Face-to-face meetings with WB, DPs, PPP Partners, and HTPs maintaining health protocol;  Formal Meetings with National/International Vendors and Contractors  Of E-waste management facility at Kaliakair HTP and IT Business Associations maintaining health protocol;  FGD, KII with the research Entities maintaining health protocol;  One-on-one meetings with WB and PPP partners maintaining health protocol;  Virtual Meeting  Disclosure of written information: brochures, posters, flyers in Bangla, website Information boards or desks  Grievance mechanism  One-to One/ Formal Meetings/Face-to-face meetings with WB, DPs, PPP Partners, and PFIs by MOF, MOEFCC/DOE, BRTA and BHTPA maintaining health protocol;  Virtual Meetings | At the MOEFCC/DOE HQ, BB, BRTA, BHTPA, and other locations suggested by the stakeholders of components 2, 3 and 4.  Initially the frequency of the meetings would be more – weekly, fortnightly, monthly, web -based meetings at short notices on need basis etc. After the project design is completed, meetings could be fortnightly and monthly or as decided by the IAs.  As and when needed. | PIUs of 4 IAs |
| STAGE 2: Project Implementation | **Component 1:** **Environmental Governance**  Ministry of Finance  Ministry of Environment, Forest and Climate Change (MOEFCC)  Department of Environment (DOE)  Ministry of Road Transport and Bridges (MORTB)  Ministry of Local Government, Rural Development and Cooperatives (MOLGRDC)  Ministry of Posts, Telecommunications and Information Technology (MOPTI)  Prime Minister’s Office (BEZA)  Ministry of Law, Justice and Parliamentary Affairs  Parliamentary Committee on Environment, Forest and Climate Change  Bangladesh Civil Services (BCS)  General Public including women representatives, who are most adversely impacted by climate change and environmental pollution. People impacted by economic or physical displacement, including informal settlers.  WB-IDA, IFC  Other DPs  **Component 2: Green Financing**  MOF  Planning Commission  MOEFCC/DOE  Bangladesh Bank   * Credit Guarantee Unit * Sustainable Finance Department (Technical Oversight)   Selected Eligible Brick kilns ready for HHK and Tunnel Kiln Modification  Bangladesh Brick Manufacturing Owners Association (BBMOA)  Bangladesh Auto Brick Manufacturers Association (BABMA)  Brickfield Workers Association  Workers in the selected Brickfields and their family members  National/International Vendors and Contractors  5-10 selected Participating Financial Institutions (PFI)  Selected Technical Institute identified to support the Brick Kiln Green CGS Scheme  WB-IDA, IFC  Other DPs  International and domestic donors of Environment Fund  **Component 3: Vehicle Emission Inspection**  Ministry of Finance  MOEFCC  DOE  PPP Partners responsible for developing 5 new Vehicle Inspection Centers  BRTA  Dhaka Transport Coordination Authority (DTCA)  Dhaka Transport Coordination Board (DTCB)  Roads and Highways Department  Dhaka Metropolitan Police (Traffic Division)  Private and Commercial Vehicle Owners  Different Transport Owners and Transport Workers Association  National/International Vendors and Contractors  WB-IDA, IFC  Other DPs  **Component 4: E-waste Management Facility**  MOF  MOLGRD&C  MOEFCC/DOE  MOPTI  PM’s Office (BEZA)  BHTPA  PPP partners involved with E-waste management facility at Kaliakair HTP and other HTPs managed by BHTPA across the country  National/International Vendors and Contractors working on developing E waste Management Facility  WB-IDA, IFC  Other DPs  **Component 5: Contingency Emergency Response Component** **(CERC)**  MOF, MOEFCC/DOE, BB, BRTA, BHTPA, PFIs, PPP Partners  WB-IDA, IFC  Other DPs | Grievance mechanism  OHS of the workforce Health and safety impacts (EMF, community H&S, community concerns)  Employment opportunities  Project status | Face-to-face meetings maintaining health protocol;  Formal Meetings with PPP Partners, other implementing entities, contractors, suppliers, supervising Technical Institutes etc. maintaining health protocol;  Virtual Meeting and  One-on-one meetings with WB and PPP partners and PFIs maintaining health protocol;  Disclosure of written information: brochures, posters, flyers in Bangla intimating progress of the work, any design change etc.  Updating website at regular interval  Information boards or desks  Grievance mechanism | At the MOEFCC/DOE HQ, BB, BRTA, BHTPA, and the sub project sites or other locations as suggested by PPP partners, PFIs etc. for components 2, 3 and 4.  Initially the frequency of the meetings would be more –fortnightly, and monthly;  As the implementation gains tempo, the meetings could be every 2/3 months and as and when needed.  web -based meetings at short notices on need basis etc.  Periodic Communication through mass/social media as needed  Notice boards updated bi-weekly  Routine interactions  Brochures in local offices  As and when needed. | MOEFCC/DOE HQ, BB, BRTA, and BHTPA and their implementing staffs at the sub-project level |
| STAGE 3: Operation and maintenance | **Component 1:** **Environmental Governance**  Ministry of Environment, Forest and Climate Change (MOEFCC)  Department of Environment (DOE)  General Public including women representatives, who are most adversely impacted by climate change and environmental pollution. People impacted by economic or physical displacement, including informal settlers.  **Component 2: Green Financing**  MOEFCC/DOE  Bangladesh Bank  Selected Eligible Brick kilns ready for HHK and Tunnel Kiln Modification  5-10 selected Participating Financial Institutions (PFI)  Selected Technical Institute to support the Brick Kiln Green CGS Scheme  **Component 3: Vehicle Emission Inspection**  MOEFCCDOE  /PPP Partners responsible for developing 5 new Vehicle Inspection Centers  BRTA  Dhaka Transport Coordination Authority (DTCA)  Dhaka Transport Coordination Board (DTCB)  Roads and Highways Department  Dhaka Metropolitan Police (Traffic Division)  Private and Commercial Vehicle Owners  Different Transport Owners and Transport Workers Association  **Component 4: E-waste Management Facility**  MOEFCC/DOE  MOPTI  BHTPA  PPP partners involved with E-waste management facility at Kaliakair HTP and other HTPs managed by BHTPA across the country  Producers, dealers, collection centers, refurbishing companies, dismantlers, recyclers, auctioneers, consumers and bulk consumers involved in the sale, purchase and processing of electrical and electronic equipment or components  Bulk users of electronic gadgets namely Military, Para military and Intelligence Organizations, Civil Aviation Authority, mobile phone companies, embassies, Hotels, Commercial Banks, ICT gadget/mobile phone manufacturers, Service sector including Hotels and Tourism, E-Commerce entities, manufacturers, Hospitals and diagnostic Centers, large shopping malls selling computers, mobile phones etc. at Eastern Plaza, Banani DCC Market, Elephant Road, BCS Computer City at Agargaon, Cineplexes, and other users of computers, radio frequency items, radar, mobile phones, jammers and other electronic generating E-waste. Similar entities at the Division and District HQs are also to be considered  **Component 5: Contingency Emergency Response Component (CERC)**  MOF, MOEFCC/DOE, BB, BRTA, BHTPA, PFIs, PPP Partners | DOE is more agile with regulatory changes and updating of ECA 1995,  Institutional Reforms and Capacity Building.  Air Quality improvement in greater Dhaka City and suburbs and whole country, efficient E-waste disposal, and less pollutant brick kiln producing bricks without using coal and firewood  Satisfaction with engagement activities and GRM | Outreach to individual PAPs/beneficiaries while maintaining health protocol;  Alternatively using the web based social media communication means, wherever possible;  MOEFCC/DOE Website to update changes that took place upon completion of implementation of the project. | Outreach as needed  Meetings in affected people and villages (as needed/requested)  Monthly (newsletter)  As and when needed. | MOEFCC/DOE HQ, BB, BRTA, and BHTPA staffs at the HQ level and project staffs at the newly completed Kaliakair E-Waste Management facility, newly established Vehicle Inspection Centers, and Divisional Laboratories and newly constructed District offices and upgraded Brick Kilns  PPP Partners and PFIs could also educate on their experience with the project and suggest measures to improve future involvements. |

# **Chapter 5: Grievance Redress Mechanism**

The various stakeholders including PAPs, other interested parties, aspirant job seekers, Contractors/Vendors and suppliers, Research Organizations, CSOs CBOs and the common people may wish to communicate suggestions, comments or complaints at any time by using the project’s Grievance Redress Mechanism (GRM). Owing to the involvement of four IAs namely MOEFCC/DOE, BB, BRTA and BHTPA in the project, individual IA would need to develop its own GRM that along with GBV/SEA/SH related issues. Separate Labor related GRM has to be developed by IAs where labor and construction work would be involved. The overall objectives of the GRM are to:

* Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to the social and environmental impact. Strengthen accountability to the beneficiaries, including project-affected people.
* Decrease the risk of poor management of construction activities due to early-warning mechanism.
* Record and address GBV services related complaints.

The GRM will be accessible to all Internal, external, and international stakeholders, including affected people, community members, civil society, media, vulnerable people and other interested parties. External stakeholders at the international level could use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the BEST Project. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. A separate mechanism will be available for the workers working under contractors and sub-contractors at different sub-project sites throughout the country as per the guidance of ESS2. The GRM would also be made available online so that grievances could be submitted without the need for physical interaction, especially during the time of COVID-19 pandemic.

Four IAs would be involved with the implementation of the project components and the GRM must be suited basing on the ground realities. DOE, being responsible ofperforming M&E activities at the project level, should be kept in the loop to record all the grievances received by different IAs. Individual PIUs of the IAs would be responsible for the GRM for their component related grievances and feed DoE PIU with all the grievance related information and the outcome so that DoE as the coordinator of GRM for the project has all the information from other PIUs. For effective functioning of the GRM, IAs to define various levels of the Grievance Redress Committees (GRCs) and composition of the committees and modus operandi of lodging a complaint and the timeframe and hierarchy of addressing those suiting the activities of various components of the project. There is a necessity to have a field level GRM wherever construction related works are planned, be it DoE offices at District HQs and laboratories at the Region/Division HQs, modernization of 20-30 brick kilns, construction of 5 VICs or E waste management Infrastructure at Kaliakair HTP.

The GRM should be user friendly and easily approachable, particularly by the physically and mentally disabled, marginalized and the vulnerable groups including the ethnic minorities, when available.

### Subproject level GRM

A Grievance Redress Committee (GRC) should be formed for each sub-project site where the local community, CSOs, CBOs, local NGOs working on Gender and GBV issues, contractors, suppliers etc. when aggrieved, could lodge their complaints for immediate redressal in situ. The IAs should form such GRCs ensuring acceptability of the members, and easy accessibility by the affected persons. The Secretariat for local GRC will be at the office of the sub-project. The GRC will ensure proper presentation of complaints and grievances as well as impartial hearings and investigations, and transparent resolutions. Where grievances are among the affected persons, the membership composition of the GRCs will take into account any traditional conflict resolution arrangements that communities may practice. If the aggrieved person is a female, the GRC will ask the concerned female representative from the community/local NGO to participate in the hearings. Members of the GRCs will be nominated by the by the IAs through consultation with their staffs in the sub-project sites and the local administration/local leadership. A grassroot level GRC should have a Convener, a Member-secretary and 3-5 members where at least two could be female members. The GRC members should be respectable and impartial educated personalities. A suggested GRC at subproject level is given below:

**GRC composition at Subproject level**

|  |  |
| --- | --- |
| 1. Senior Field Level Officer responsible for the sub-project | Convener |
| 2. Local UP Member/Ward Councilor | Member |
| 3. An SMC member/Teacher from Govt. Primary School | Member |
| 4. Representative from Local Women’s Group /Local NGO | Member |
| 5. Community Leader from the PAP/ VG/ethnic community, when available | Member |
| 6. A field level officer nominated by the Convener | Member-Secretary |

All complaints will be received at the office of the sub-project site. A ‘Complaint Box’ should be kept at the site for ease of submission of written complaints. All cases at the subproject level will be heard and solved **within 10 days of their receipt**. The E&S Specialists at the PIUs will make periodic visit to the subproject sites, interact with the communities and affected persons, and pick up issues of concerns, complaints and suggestions to register with the GRM books. Grievances received through any channel will be registered and a notification of receipt with assurance of necessary review and resolution given in writing to the aggrieved persons. If a decision at Subproject Level is unacceptable to the aggrieved person(s), the Subproject Level GRC should refer the case to the GRC at the PIU with the minutes of the hearings.

### Composition at PIU and PCMU level

PD or his representative would be the Convener and Social Management Specialist at the PIU will be the Secretary for the PIU level GRC. A member from the affected community under the PIU will also be made a member.

**Table 7. PIU Level GRC**

|  |  |
| --- | --- |
| Project Director (PD) of PIUs | Convener |
| Social Specialist | Member Secretary |
| One female representative from PIUs (DoE/BB/BRTA/BHTPA) | Member |
| A representative from affected community | Member |

Convener/Member Secretary of the Field Level GRC would present the case at the PIU level GRC. At the PIU level, decisions on unresolved cases, if any, will be made in **no more than 15 days** from receipt of the complaint by an official designated by the PD. A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon the IA. There will be budgetary allocation for Subproject Level GRC members to participate in the PIU level GRC meetings.

If a person who submits a grievance is not satisfied with the resolution at the subproject level, he or she may request it be elevated to the PIU level GRC. If they are not satisfied with the ultimate resolution by the PIU, they may elevate it to PCMU level who will solve the issues in 15 days time. The Project Coordinating Director will be Convenor of such PCMU level GRC with the Social Specialist of the particular PIU will act as Secretary. A representative of the aggrieved community will also be made a member of PCMU level GRC. In case such solution is not accepted, the complainant may pursue legal remedies in court or pursue other avenues. Throughout the entire process, DOE PIU at the Project Level will maintain detailed record of all deliberations, investigations, findings, and actions, and will maintain a summary log that tracks the overall process.

Table 8. GRC Membership at PCMU Level

|  |  |
| --- | --- |
| Additional Secretary of MoEFCC as the Project Coordination Director (PCD) | Convener |
| Social Specialist of concerned PIU | Member Secretary |
| Gender Focal Person of MoEFCC | Member |
| Representative of affected people | Member |

The composition of GRC at the PIU and Subproject Level should be communicated through project website, billboard at the sub-project site and other locations of public gathering in the vicinity, posters, flyers and through social media in Bangla and English indicating name of the contact person, location, contact number, email address etc.

The following steps will be followed for the successful implementation of GRM:

* ***Step 1:*** Project stakeholders will be able to provide feedback and report/record complaints through several channels: in person at offices (DOE, BB, BRTA and BHTPA), Complaint Box located at the sub-project sites, and to the Convener by mail, telephone, and email. There could be occasions when the complainant might shy away from identifying oneself. In such cases most of the complaints could be of common nature affecting a group/ indicating corruption in the implementation by some quarter etc. and not affecting an individual. These complaints should also be addressed in the same manner as if the complainant has an identity and if found correct, appropriate measures be taken and communicated to all concerned.
* ***Step 2:*** Complaints and feedback will be compiled in each level and recorded in a register. He or she will place the grievances to the committee and the complained person with the goal to resolve complaints within ten days of receipt at Subproject level.
* ***Step 3:*** As soon as the complaint is received, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint’s validity, and then developing a proposed resolution. Depending on the nature of the complaint, the process can include site visits, document reviews, a meeting with the complainant (if known and willing to engage), and meetings with others (both those associated with the project and outside) who may have knowledge or can otherwise help resolve the issue. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register. If complaints are not resolved within ten days, the responsible person will forward the complaint to the PIU GRC along with relevant documents for action at PIU GRC’s end. The complainant must be informed about this matter immediately.
* ***Step 4:*** All efforts must be made to come to some amicable solution by PIU level GRC within 15 days from receipt of the complaint from Subproject level. This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. Whenever possible, complainants should be informed of the proposed resolution in person. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include elevating the complaint to PCMU level which would take 15 days to provide a solution. Data on grievances and/or original grievance logs will be made available to World Bank missions on request, and summaries of grievances and resolutions will be included in periodic reports to the World Bank.

It is to be noted that the Project level GRC will have provisions to address grievances related to ethnic communities and GBV/SEA/SH and therefore should use members conversant with gender and ethnic minority issues and should be trained as such.

**GBV/SEA/SH at the Project sites and Addressing Them**

From the likely activities of the ‘Bangladesh Environmental Sustainability and Transformation project (P172817)’, GBV/SEA/SH related risk is assessed as ‘Low’. The project will try to recruit most of the labors locally. However, any labor employment may give rise to GBV/SEA/SH related issues at local level. To reduce the chances, labor/workers may be selected at the local level as much as possible without compromising the efficiency of the work and thus reducing labor influx.

Furthermore, the project will raise awareness in the community level about GBV/SEA/SH issues, sensitize staffs at PIU and PCMU levels, ensure contractor’s workers are trained on GBV/SEA/SH issues and sign a Code of Conduct, arrange for mapping service provider and coordinate closely with the government officials and other development organizations, involved in GBV/SEA/SH response services, who have standard rules and follow protocol for GBV/SEA/SH response that is consistent with the World Bank Good Practice Note on Gender-based Violence. All these factors benefit the project by reducing the GBV risks for service providers, service recipients and the surrounding communities.

The Toll-free Number **(109)** for receiving GBV/SEA/SH related complaints under Ministry of Women and Children Affairs (MoWCA’s) Multi-Sectoral Program on Violence Against Women (MSPVAW) program have telephone operators round the clock who can speak in Bangla and English so that the complainants feel at ease while communicating. This number is not BEST project specific, nonetheless can be used to report any GBV/SEA/SH related complaints. GBV/SEA/SH victims can use this Toll-Free Number for lodging complaints. The ‘Toll-Free Number’ should be displayed at different sites within the project area so that all are aware of this supporting tool.

## **5.1 Grievance logs**

As noted previously, the PIUs will maintain a grievance log. This log will include at least the following information:

* Individual reference number
* Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously or is GBV/SEA/SH related)
* Details of the complaint, feedback, or question/her location and details of his / her complaint.
* Date of the complaint.
* Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.)
* Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution
* Date when proposed resolution was communicated to the complainant (unless anonymous)
* Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution
* Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out
* If necessary, details of various GRC levels, referrals, activities, and decisions
* Date when the resolution is implemented (if any).

Grievance resolution will be a continuous process in sub-project level activities and implementation of those. The PIUs will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by Bank and any other interested persons/entities. The PIUs will also prepare periodic reports on the grievance resolution process and publish these on their website while DOE to publish a consolidated report encompassing all the PIUs.

## **Monitoring and reporting on grievances**

Details of monitoring and reporting are described above. Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Implementing Agencies. To ensure management oversight of grievance handling, the PCMU will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

## **Points of Contact**

Information on the project and future stakeholder engagement programs will be available on the project’s website and other places as mentioned at paragraph 4.3. Information can also be obtained from the PIUs. All the PIUs must indicate a dedicated point of contact for recording project related complaints at every level (including GBV/SEA/SH related complaints) and passing those to the GRC for necessary action at their end.

The point of contact regarding the stakeholder engagement program and GRM at various levels of the concerned IAs should be informed to the stakeholders and local community. The following information must be provided for ease of communication:

|  |  |
| --- | --- |
| *Description* | *Contact details* |
| Name and position/organization: |  |
| Address: |  |
| Email: |  |
| Telephone: | Mobile Number: |
| Address of GRM Website when developed: |  |

# **Chapter 6: Implementation of the SEP and Budget**

## **6.1 Institutional and Implementation Arrangements**

BEST project would work on air quality and waste management issues. As such, an integrated cross sectoral approach is critical for effective implementation of the project by different IAs under the joint project steering committee. This would result in better understanding of the sectoral issues and challenges by the different stakeholder agencies and policy harmonization across different agencies. Through extensive consultations during project preparation, MoEFCC/DOE has agreed with all stakeholders on the implementation arrangements shown in Figure 1.

To effectively coordinate stakeholders’ participation in different project activities, a joint project steering committee (PSC) will be created under the leadership of Secretary MoEFCC and with representatives from the Ministry of Finance (Finance Division, Banking Division, Economic Relations Division), BB, Ministry of Road Transport and Bridges, MOPTI, MLGRDC, and PM Office (BEZA). Additional representatives from other ministries may be included as appropriate.

Under the PSC, a joint project coordination and monitoring unit (PCMU) will be established under MoEFCC with an additional secretary MoEFCC to serve as the project coordination director. This unit will be hosted by the DOE PIU with members from DOE, BB, BRTA and BHTPA and facilitate coordination of all four implementing agencies and provide all secretarial support to PSC. PSC will meet twice a year to (a) review implementation results of a given year and the proposed implementation plans for the next year at the end of an implementation year; and (b) review implementation progress and approve adjustments needed in the middle of an implementation year. As appropriate, additional PSC meetings may be organized at the request of PSC members. PSC will make key decisions related to the implementation of this project.

During preparation, each implementing agency (IA) has prepared its own Development Project Proposal (DPP) per GOB requirements. As such, each IA will receive its own budget allocation during project implementation through its own Designated Account, which will be convertible special taka accounts. This will avoid potential delays caused by coordination issues under a combined PIU/DA arrangement.

**Figure 1: Implementation Arrangements**

## **6.2 Roles and Responsibilities of each PIU**

Each implementing agency will establish its own project management unit (PIU) as indicated below:

DOE PIU would manage DOE activities under Component 1 and Component 2.2 of the project. This PIU will also serve as the Project Monitoring and Coordination Unit to support the Project Steering Committee to supervise and facilitate the implementation of the overall project. The PIU will have the following key staff members: (a) Project Director (PD); (b) M&E specialist; (c) procurement specialist; (d) financial management (FM) specialist, and (e) environmental and social (E&S) specialist. Additional technical experts will be mobilized to support the PIU to review specific technical issues identified during project implementation. Finally, the subcomponent will also support incremental operating costs incurred by the PIU. (para 36, page 17)

BB PIU would be responsible to manage Component 2 of the project along with DOE and will have the following key staff members: (a) PD; (b) M&E specialist; (c) FM specialist, and (d) E&S specialist. Additional technical experts will be mobilized to support the PIU to review specific technical issues identified during project implementation.

BRTA PIU would be responsible to manage Component 3 of the project and will have the following key staff members: (a) PD; (b) M&E specialist; (c) procurement specialist; (d) FM specialist, and (e) E&S specialist. Additional technical experts will be mobilized to support the PIU to review specific technical issues identified during project implementation. Finally, the subcomponent will also support incremental operating costs incurred by the PIU. (para 53, page 21)

BHTPA PIU would manage activities under Component 4. It is expected that this PIU will be developed on the basis of BHTPA’s existing PIU under the PRIDE project. The PIU will have the following key staff members: (a) PD; (b) M&E specialist; (c) procurement specialist; (d) FM specialist, and (e) E&S specialist. Additional technical experts will be mobilized to support the PIU to review specific technical issues identified during project implementation. Finally, the subcomponent will also support incremental operating costs incurred by the PIU. (para 58, page 21)

The specific role/responsibilities as regard the project’s stakeholders’ management is provided below:

#### Table 9: Role and Responsibilities for SEP Implementation

| Actor/Stakeholder/ responsible person | Responsibilities |
| --- | --- |
| E&S Specialists and GRM team | * Overall planning and implementation of the SEP; * Lead activities on stakeholders’ engagement * Management and resolution of grievances; * Guide/coordinate/supervise the contractors for activities related to the SEP * Monitoring and reporting on SEP by MOEFCC/BB/BRTA and BHTPA and World Bank * Take lead in carrying out the beneficiary satisfaction survey |
| PIU Officials at HQ level | * Visit dedicated project/subproject area for M&R (at least Twice a year or as planned by the hierarchy) |
| Implementation Consultants | * Supervision/monitoring of Contractor on SEP and GRM |
| Site Contractor(s) / sub-contractors | * Report/inform PIU representatives at the subcomponent level * implementation of the SEP / engagement with the stakeholders. * Resolve and convey management/resolution of grievance cases to the project GRM team, in particular labor related grievance cases. * Prepare, disclose and implement the contractor’s code of conduct, ESMP, etc. * Collaborate/inform the local communities and other local level stakeholders on the E&S monitoring |
| Other interested stakeholders (external/regulatory agencies) | * Participate in the implementation of SEP, and ESMP activities * Monitor/ensure project’s compliance with the laws of Bangladesh * Engage with the project’s stakeholders on E&S issues |

## 

## **6.3 Budget for SEP Implementation**

It is already mentioned that each implementing agency (IA) has developed its own DPP as per GOB requirements. As such, each IA will receive its own budget allocation during project implementation. In view of ante, eachIA would work out its own Budget for SEP Implementation. The budget includes all the activities pertaining the project’s stakeholder engagement plan and comprises of a range of activities of the project. This budget will be annually reviewed by the IA PIUs and if necessary, will be revised and adjusted. The budget is provided at Table 11 below (all figures are in USD):

#### A tentative budget for implementing this SEP by the various IAs for the entire duration of the project is included below.

#### Table 10: SEP Implementation Budget -MoEFCC/DoE

| **Serial** | **Activities** | **Quantity** | **Unit Cost (USD)** | **Times/Month- 36 months from Effective Date** | **Total Cost (USD)** |
| --- | --- | --- | --- | --- | --- |
| 1. | **Stakeholder Engagement Activities** |  |  |  |  |
| 1.1 | Salary - Environment and Social Specialists, Monitoring and Evaluation (M&E) Specialist, Procurement Specialist, Financial Management Specialist {Gender and GBV Specialist and Labor and OHS Specialist would need to be hired during construction of facilities in 30 Districts and 6 regional/divisional laboratories} | 5 + 2 = 7 | 1000 for first 4 and 800 for the rest two | First 5 specialists for 48 months and the last two for 36 months | 297,600 **(will be paid from project)** |
| 1.2 | Travel expenses of the two specialists for 3 years to monitor construction work at Divisional and District HQs and Stakeholder/Community/Sensitization meeting/survey | 4 times in the first year and 6 times in following two years – Total 10 times- visit number of districts in one go | 1000 | 36 months | 10,000 |
| 1.3 | Stakeholder Meeting at MoEFCC /DoE at Macro Level | 3 meetings at DoE prior Effective date and then minimum twice in each year in the following 3 years | 500 | 48 months | 4,500 |
| 1.4 | Communication Materials (Posters; Brochure, Flyers, Billboard uploading information in website etc.) | Lump Sum | 5,000 | 48 months | 5,000 |
| 1.5 | Travel Expenses for Senior staffs of Ministry/DoE | 2-3 visits in a FY | 1,000 | 36 months | 9,000 |
| 1.6 | Miscellaneous | Lump Sum | 5000 a year | 36 months | 5,000 |
| 1.7 | **TOTAL ON SEP ACTIVITIES (except for salary)** | | | | **34,500** |
| 2 | **Grievance Redress Activities** | | | | |
| 2.1 | Communication Materials | Lump sum for whole period | 5,000 | 48 months | 5,000 |
| 2.2 | GRM Guidebook | 1 | 2,000 | 48 months | 2,000 |
| 2.3 | Suggestions Box | 36 Numbers | 100 | 48 months | 3,600 |
| 2.4 | GRM MIS Database | Lump sum | 5000 | 48 months | 5,000 |
| 2.5 | Honorarium for committees | Lump sum | 2,500 a year | 48 months | 10,000 |
| 2.6 | **TOTAL ON GRM** |  |  |  | **25,600** |
| **GRAND TOTAL** | | | | | **60,100** |

#### Table 11: SEP Implementation Budget - Bangladesh Bank

| **Serial** | **Activities** | **Quantity** | **Unit Cost (USD)** | **Times/Month- 36 months from Effective Date** | **Total Cost (USD)** |
| --- | --- | --- | --- | --- | --- |
| 1. | **Stakeholder Engagement Activities** |  |  |  |  |
| 1.1 | Salary - Monitoring and Evaluation (M&E) Specialist, Procurement Specialist, Financial Management Specialist, Environment and Social Specialists at the PIU | 5 | 1000 | 48 | 240,000 **(will be paid from the project)** |
| 1.2 | Travel expenses 3 years to monitor construction work of the Brick Kilns at the selected areas and Stakeholder/PAP/Sensitization meeting | 8 times in the first 2 years to Pilot Kilns and 3 times in the third year to the other kilns – Total 11 times- visit number of sites in one go | 1000 | 36 months | 11,000 |
| 1.3 | Stakeholder Meeting at BB with relevant PFI, DoE Brik Kiln Body etc. at Macro Level | 3 meetings prior Effective date and then minimum twice in each year in the following 3 years | 500 | 48 months | 4,500 |
| 1.4 | Communication Materials (Posters; Brochure, Flyers, Billboard uploading information in website etc.) | Lump Sum | 5,000 | 48 months | 5,000 |
| 1.5 | Travel Expenses for Senior staffs of BB along with selected PFIs | 2-3 visits in a FY | 500 | 48 months | 6,000 |
| 1.6 | Miscellaneous | Lump Sum | 2000 a year | 36 months | 6,000 |
| 1.7 | **TOTAL ON SEP ACTIVITIES (except salary)** | | | | **32,500** |
| 2 | **Grievance Redress Activities** | | | | |
| 2.1 | Communication Materials | Lump sum for whole period | 2,500 |  | 2,500 |
| 2.2 | GRM Guidebook | 1 | 2,000 |  | 2,000 |
| 2.3 | Suggestions Box at 30 District and 6 Region/Division HQ | 36 | 100 |  | 3,600 |
| 2.4 | GRM MIS Database | Lump sum | 2000 |  | 2,000 |
| 2.5 | Honorarium for committees | Lump sum for whole period | 1,250 |  | 5,000 |
| 2.6 | **TOTAL ON GRM** |  |  |  | **15,100** |
| **GRAND TOTAL** | | | | | **47,600** |

**Table 12: SEP Implementation Budget – BRTA**

| **Serial** | **Activities** | **Quantity** | **Unit Cost (USD)** | **Times/Month- 36 months from Effective Date** | **Total Cost (USD)** |
| --- | --- | --- | --- | --- | --- |
| 1. | **Stakeholder Engagement Activities** |  |  |  |  |
| 1.1 | Salary - Monitoring and Evaluation (M&E) Specialist, Procurement Specialist, Financial Management Specialist, Environment and Social Specialists, at the PIU | 5 | 1000 | 48 | 240,000 **(will be paid from project)** |
| 1.2 | Travel expenses 3 years to monitor development work of the 5 x VICs at the selected areas and rehabilitation of existing 4 x VICs and related Stakeholder/PAP/Sensitization meeting | 3 times in each year – Total 9 times- visit number of sites in one go | 1000 | 36 months | 9,000 |
| 1.3 | Stakeholder Meeting at BRTA with relevant stakeholders at Macro Level and at VIC sites at micro level | 3 meetings prior Effective date and then minimum twice in each year in the following 3 years -9 Meetings in total | 500 | 48 months | 4,500 |
| 1.4 | Communication Materials (Posters; Brochure, Flyers, Billboard uploading information in website etc.) | Lump Sum | 2,000 | 48 months | 2,000 |
| 1.5 | Travel Expenses for Senior staffs of BRTA to the VICs | 2-3 visits in a FY | 500 | 48 months | 6,000 |
| 1.6 | Miscellaneous | Lump Sum | 5000 |  | 5,000 |
| 1.7 | **TOTAL ON SEP ACTIVITIES (except for salary)** | | | | **26,500** |
| 2 | **Grievance Redress Activities** | | | | |
| 2.1 | Communication Materials | Lump sum for whole period | 2,500 |  | 2,500 |
| 2.2 | GRM Guidebook | 1 | 1,000 |  | 2,000 |
| 2.3 | Suggestions Box at 5 x VIC | Lump Sum for whole period | 100 each |  | 500 |
| 2.4 | GRM MIS Database | Lump sum | 1,000 |  | 2,500 |
| 2.5 | Honorarium for committees | Lump sum for whole period | 1,500 |  | 6,000 |
| 2.6 | **TOTAL ON GRM** |  |  |  | **13,500** |
| **GRAND TOTAL** | | | | | **40,000** |

#### Table 13: SEP Implementation Budget – BHTPA

| **Serial** | **Activities** | **Quantity** | **Unit Cost (USD)** | **Times/Month- 36 months from Effective Date** | **Total Cost (USD)** |
| --- | --- | --- | --- | --- | --- |
| 1. | **Stakeholder Engagement Activities** |  |  |  |  |
| 1.1 | Salary - Monitoring and Evaluation (M&E) Specialist, Procurement Specialist, Financial Management Specialist, Environment and Social Specialists, at the PIU | 5 | 1000 | 48 | 240,000 **(will be paid from project)** |
| 1.2 | Travel expenses 3 years to monitor development work of the E-Waste Management Facility at Kaliakair | 3 times in each year – Total 9 times- | 500 | 36 months | 4,500 |
| 1.3 | Stakeholder Meeting at BHTPA with relevant stakeholders at Macro Level and at other High-Tech Parks sites at micro level | 3 meetings prior Effective date and then minimum twice in each year in the following 3 years -9 Meetings in total | 500 (Year 1)  800 (3 Years after Effective date) | 48 months | 6,300 |
| 1.4 | Communication Materials (Posters; Brochure, Flyers, Billboard uploading information in website etc.) | Lump Sum | 2,000 | 48 months | 2,000 |
| 1.5 | Travel Expenses for Senior staffs of BHTPA to Kaliakair HTP E-Waste Management Facility site | 2-3 visits in a FY | 500 | 36 months | 4,500 |
| 1.6 | Miscellaneous | Lump Sum | 5000 |  | 5,000 |
| 1.7 | **TOTAL ON SEP ACTIVITIES (except Salary)** | | | | **22,300** |
| 2 | **Grievance Redress Activities** | | | | |
| 2.1 | Communication Materials | Lump sum for whole period | 500 |  | 2,500 |
| 2.2 | GRM Guidebook | 1 | 500 |  | 2,000 |
| 2.3 | Suggestions Box 2 |  | 100 each |  | 200 |
| 2.4 | GRM MIS Database | Lump sum | 1,000 |  | 2,500 |
| 2.5 | Honorarium for committees |  | 1,500 | 36 months | 4,500 |
| 2.6 | **TOTAL ON GRM** |  |  |  | **11,700** |
| **GRAND TOTAL** | | | | | **34,000** |

# **Chapter 7: Monitoring and Reporting**

Regular monitoring of project progress will be built into the design, in the form of appropriate indicators, targets, information systems, and review mechanisms. Each PIU will perform its own M&E activities while the PCMU will perform M&E activities at the project level. DOE will be responsible for managing a 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 PFIs, BB, MoF, BRTA, MoRTB, MoPTI, BHTPA, MoEFCC and DOE officials, and consultants, to collect data on project progress. The M&E system will be used to take corrective actions, improve coordination, and facilitate learning throughout project implementation.

The PIUs will prepare quarterly progress reports during project implementation on: (a) updated implementation schedules by component; (b) commitment and disbursement by component; (c) the status of project indicators against agreed targets; and (d) findings, recommendations, and agreements to be reached on key implementation issues. The consolidated quarterly progress reports will be submitted by the DOE to the World Bank and relevant line ministries. In addition, the World Bank, the PIUs and other stakeholders will carry out annual progress reviews and a midterm review (MTR) of the project.

Monitoring and reporting will include involving Project Affected Parties, internal and external stakeholders, interested group and the vulnerable in monitoring mitigation measures that will be agreed on the ESCP to satisfy stakeholder concerns; thus, promoting transparency. The ESCP will further outline, based on close consultations with all stakeholders, how affected parties and interested or beneficiary parties will be involved in the monitoring and evaluation and assess whether or not capacity building and training programmes will be required to enable affected parties and local council staff participate in monitoring. The Project will establish a monitoring system that is participatory, which will utilize indicators that are sensible to concerned stakeholders. Furthermore, the project will involve affected parties by gathering their observations to triangulate scientific findings and involve them in participatory discussions of external and monitoring and evaluation missions.

The monitoring report will include clear and specific indicators both as regard the engagement with stakeholders and also the project’s grievance redress management. The Communication Expert will work on a reporting matrix in this regard.

#### Table 11: Monitoring Report Matrix

|  |  |  |  |
| --- | --- | --- | --- |
| Key elements | Timeframe | Methods | Responsibilities |
| Stakeholders’ access to project information and consultations | Periodic (during project preparation and maintained throughout project implementation) | Interviews, observations, survey | PIUs together with their representatives at the project sites and external monitor whenever employed |
| Project beneficiaries’ awareness of project activities, their entitlements and responsibilities | Periodic (during project implementation) | Interviews, observations, survey | PIUs together with external monitor |
| Acceptability and appropriateness of consultation and engagement approaches | Periodic (during project implementation) | Interviews, observations, survey, score card as relevant | PIUs together with external monitor |
| Community facilitators’ engagement with target beneficiaries | Periodic (during project implementation) | Interviews, observations, survey, score card as relevant | PIUs together with external monitor |
| Public awareness of GRM channels and their reliability | Periodic (during project implementation) | Spot checks, interviews, observations | PIUs together with external monitor |
| Accessibility and readability of public information dissemination materials | Periodic (during project implementation) | Spot checks, interviews, desk-review | PIUs together with external monitor |
| Tones in social media and broader public perceptions (including NGOs/CSOs) | Periodic (during project implementation) | Social media monitoring, interviews, observations | PIUs together with external monitor |
| Rate of grievances and complaints (reported and unreported) | Periodic (during project implementation) | Desk review, interviews, survey | PIUs together with external monitor |

## **7.1 Closing the Feedback Loop: Reporting back to stakeholder groups**

The BEST Project team will ensure regular/periodic reporting back and information sharing with the PAPs and as well as the stakeholders’ groups. This ‘reporting back’ measures vis-à-vis the PAPs and other stakeholders (including the disadvantaged and the vulnerable) should be carried through face-to-face meeting or direct interactions maintaining health protocol, whenever possible. Other pertinent media, such as website, social media, press briefing, may also be used.

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner.

The Project will arrange necessary training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with community stakeholder grievances as per the Public Grievance Procedure. Project contractors will also receive necessary instructions for the Grievance Procedure and in relation to the main principles of community relations GRM in relation to the labour force working under them.

Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

* Publication of a standalone annual report on project’s interaction with the stakeholders.
* A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
* Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
* Frequency of public engagement activities;
* Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas within the Project Area of Influence (PAI);
* Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
* Type of public grievances received;
* Number of press materials published/broadcasted in the local, regional, and national media;
* Amount of Project’s charitable investments in the local communities in the Project Area of Influence.

The outcomes/feedback from these ‘reporting back’ measures will be compiled and shared/disclosed with the stakeholders’ and general public through the use of proper media, such as DOE website along with BB, BRTA and BHTPA websites, social media accounts, and relevant communication materials, etc.

# **Annex 1. Key Project Activities by Component/Subcomponent**

The project will support the following five components: (a) environmental governance and infrastructure; (b) green financing; (c) vehicle emission control; (d) e-waste management infrastructure; and (e) contingent emergency response component (CERC).

Component 1: Environmental Governance and Infrastructure

This component will support MOEFCC/DoE to lay concrete regulatory, institutional, financing and capacity foundations for the achievement of its long-term vision of helping the country ‘live in harmony with nature and achieve net zero emissions by 2050’. Specifically, this component will support (a) regulatory and policy reforms to reposition the regulatory mandate of DOE from action-oriented pollution control to goal-oriented protection and improvement of environmental quality and promotion of green growth; (b) institutional reforms to shift DOE’s organizational structure towards specialization and decentralization with improved human and financial resources, essential environmental infrastructure, and capable financing and technical institutions; (c) capacity building to support MOEFCC/DOE and its key stakeholders develop adequate technical capacity in environmental management and green growth; and (d) project management of MOEFCC/DOE activities. As women are most affected by climate change and environmental pollution, they will be engaged as critical stakeholders in the implementation of this component and will be offered equal opportunities in the DOE recruitments and capacity-building activities.

Component 2: Green Financing for Air Pollution Control

This component will support BB to pilot a green credit guarantee scheme (GCS) to incentivize the financial sector to support green investments in targeted polluting sectors. This scheme will provide partial credit guarantee to cover a share of the default risk that PFIs may face in extending loans to green investments, along with technical assistance to improve the understanding of PFIs and targeted sectors on green technologies and matching grant support to incentivize the targeted sectors to make green investments. Recognizing high health costs of air pollution and high contributions of particulate matters from the brick kiln sector, conventional cook stoves, waste management and thermoelectric generation, this pilot green CGS will first focus on investments to reduce air pollution control from these targeted sectors. Linking to the Government’s firm commitments to continue reducing air pollution from the brick sector, the pilot green CGS will promote technology transformation of the brick sector from high emission and energy intensive to low emission and energy efficient technologies. In addition, the green CGS will explore effective ways to incentivize private sector investments in (a) municipal waste recycling and composting investments to reduce GHG and particulate emission from waste management practices (b) clean stove production to help reduce indoor air pollution, and (c) rooftop solar systems to reduce demands for thermoelectricity and thus avoid GHG and particulate emission from associated thermoelectric generation processes. Success of this component 2will heavily rely on the successful implementation of Component 1, which is expected to impose increased regulatory pressure to incentivize the private sector to invest in promoted green technologies.

Component 3: Vehicle Emission Control

This component will finance (a) the construction of five new VICs through PPP arrangements, (b) technical assistance to improve BRTA’s capacity in vehicle inspection, and (c) project management at BRTA. Implementation of this component will be closely coordinated with the World Bank’s Road Safety Program, under which four of BRTA’s existing but nonfunctional VICs will be rehabilitated. With regulatory reforms supported under Component 1.1, it is expected that BRTA will work with DOE to develop a national vehicle inspection system to control not only vehicle emission from the country’s existing fleet but also emission from imported vehicles (new or used) and new vehicles produced in the country. These actions will help Bangladesh gradually remove noncompliance vehicles from its road and thus reduce both GHG and air pollution from its vehicles.

Component 4: E-waste Management Infrastructure

Built on tightened regulatory and enforcement pressures to be created under Component 1, this component will support (a) the development of an e-waste management infrastructure on a pilot basis through PPP arrangements to demonstrate technical, financial, and E&S feasibility of e-waste management in line with the newly issued E-waste Management Rules; (b) technical assistance to support proper operations of the pilot new infrastructure and implement other relevant provisions of the new E-waste Management Rules; and (c) project management at the Bangladesh High-Tech Park Authority (BHTPA). It is expected that successful piloting of this facility and this modality (including EPR schemes, formalization of value chain, and PPP for waste infrastructure development) will facilitate MOEFCC/DOE to develop an IWM strategy and associated investment programs under Component 1.

Component 5: Contingent Emergency Response Component (CERC)

This component will provide an *ex ante* mechanism for the GOB to gain rapid access to World Bank financing to respond to an eligible crisis or emergency that causes major adverse economic and/or social impacts. Triggers for CERC activation will be clearly outlined in the Project Implementation Manual. Disbursements will be made against an approved list of goods, works, and services required to support crisis mitigation, response, and recovery.

**Annex - 2: Sample ‘Grievance Form’ – BEST Project**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Grievance Form** | | | | | | | |
| Grievance reference number (to be completed by Project): | | | | | | | |
| Contact details  (may be submitted anonymously) | | Name (s): | | | | | |
| Address: | | | | | |
| Telephone: | | | | | |
| Email: | | | | | |
| How would you prefer to be contacted (check one) | | By mail/post:  ☐ | | By phone:  ☐ | | | By email  ☐ |
| Preferred language | | ☐ Bangla | | ☐ English | | | |
| Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible. | | | | | | | |
| What is your suggested resolution for the grievance, if you have one? Is there something you would like DOE/BB/BRTA/BHTPA or another party/person to do to solve the problem? | | | | | | | |
| How have you submitted this form to the project? | | Website  ☐ | | Email  ☐ | | | By hand  ☐ |
| In person  ☐ | | By telephone  ☐ | | | Other (specify)  ☐ |
| Who filled out this form (If not the person named above)? | | Name and contact details: | | | | | |
| Signature | |  | | | | | |
| Name of DOE/BB/ BRTA/BHTPA official assigned responsibility | |  | | | | | |
| Resolved or referred to GRC1? | | ☐ Resolved | ☐ Referred | | If referred, date: | | |
| Resolved referred to GRC2? | | ☐ Resolved | ☐ Referred | | If referred, date: | | |
| **Completion** | | | | | | | |
| Final resolution (briefly describe) |  | | | | | | |
|  | | Short description | | | | Accepted? (Y/N) | Acknowledgement signature |
| 1st proposed solution | |  | | | |  |  |
| 2nd proposed solution | |  | | | |  |  |
| 3rd proposed solution | |  | | | |  |  |

1. https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?locations=BD [↑](#footnote-ref-1)
2. Fourth Virtual Project Preparation Mission Aide Memoire April 25-May 11, 2021 [↑](#footnote-ref-2)
3. Vulnerable status may stem from an individual’s or group’s race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources. [↑](#footnote-ref-3)