



# **ENVIRONMENTAL AND SOCIAL SAFEGUARD FRAMEWORK**



# ENVIRONMENTAL AND SOCIAL SAFEGUARD FRAMEWORK

**This document was approved in the 144th meeting of BRAC Governing  
Body held on Wednesday 4 October 2017**

## FOREWORD

BRAC acts as a catalyst, creating opportunities for people living in poverty to realise their potential. Founded in 1972, the organisation specialises in piloting, perfecting, and scaling innovations to impact the lives of millions. BRAC was born in Bangladesh, and operates in 11 countries across Asia and Africa. Its aim is to change systems of inequity, empower people, and lift them out of situations of poverty, and the organisation is committed to minimising or mitigating hostile environmental, social, and economic impacts associated with all its projects.

To that end, the organisation has formulated the Environmental and Social Safeguard Framework (ESSF) which is a set of guidelines and procedures that are to be followed for all its operations. BRAC's newly adopted ESSF ensures the application of a suite of operational standards to establish technical quality and guide decisions at each point in the programme cycle based on its commitment of avoidance, minimisation or mitigation of adverse environmental, social or economic impacts. The ESSF has four entry points namely, programmes and projects, policies and strategies, operational management and mainstreaming environmental sustainability. The entry points are guided by two principles, a science based precautionary approach that leads the design and implementation of programmes, and the human-rights based approach that ensures stakeholder engagement and public participation based on equality, non-discrimination, participation and inclusion.

Affirming BRAC's commitment to the Sustainable Development Goals (SDGs), the ESSF, therefore, focuses on seven thematic safeguard standards, including having the sense of biodiversity conservation, sustainable management, resource efficiency, pollution prevention, involuntary resettlement, right of indigenous people, labourers' and working conditions, protection of cultural heritage, and gender equality in their core. These standards will serve the purpose of ensuring operational sustainability, safer and smarter work efficiency, cost effective operational choices and smarter decision making to avoid doing harm, such as aggravating resource scarcity, intensify climate change impacts, and accelerate environmental damage etc.

The ESSF adopted by BRAC has set out procedures for screening the environmental and social risks of the interventions the organisation and its partners will support in future, and deciding on the level of assessment and mitigation or management they should apply. In addition, the ESSF has set up an independent mechanism to enable BRAC to identify and classify risk categories that are likely to harm the environment and/or society by programme implementation because of inadequate compliance with the safeguards. Further, the mitigation, management and monitoring system stipulated in the ESSF document will aid the accountability mechanism, which is made visible

through two processes; access to information via disclosure of project information and grievance redress via stakeholder response.

As part of the global response to climate change, BRAC has devised this framework considering the nexus between development activities and the impacts of climate change in a comprehensible system of action. By implementing the safeguard measures, BRAC will be able to manifest its vision, mission, and values through its activities – maximising everyone’s ability to live in a world with equal access to clean air, clean water, and a healthy environment.

The ESSF is a living document, and shall be continuously updated and enhanced. It is a testament to our commitment to uphold and improve our efforts to make the world more environmentally friendly for the present and future generations. I wish to extend my appreciation to all who have contributed their time, effort, and commitment to its successful completion.

A handwritten signature in black ink, appearing to read 'Dr. Musa', with a horizontal line underneath.

**Dr. Muhammad Musa**  
Executive Director, BRAC

## CONTENTS

<b>CHAPTER 1: INTRODUCTION</b>	<b>1</b>
1.1 Background	2
1.2 About BRAC	2
1.3 Statement of commitment	4
1.4 Purpose of the framework	4
1.5 Target audience	4
1.6 Scope of the framework	4
<b>CHAPTER 2: GENERAL PRINCIPLES AND THEMATIC ESSF REQUIREMENTS</b>	<b>5</b>
2.1 ESS principles of BRAC	6
2.2 Detailed thematic ESSF requirements	6
<b>CHAPTER 3: PROCEDURES FOR IMPLEMENTING THE ENVIRONMENTAL AND SOCIAL SAFEGUARD FRAMEWORK</b>	<b>14</b>
3.1 Use of partner organisation's safeguards systems	15
3.2 Safeguards in the BRAC project cycle: development, implementation, monitoring and evaluation	15
3.2.1 <i>Environmental and social screening</i>	17
3.2.2 <i>Preparation of safeguard assessment and management plans prior to project/programme approval</i>	21
3.2.3 <i>Safeguard management plans for high and moderate risk projects/programmes</i>	21
3.2.4 <i>Project review committee (PRC) approval and clearance of the safeguard instruments</i>	22
3.2.5 <i>Mitigation, management and monitoring of impacts during project implementation</i>	22
3.3 Accountability mechanism for safeguards, including disclosure and stakeholder responses	23
3.3.1 <i>Access to information</i>	23
3.3.2 <i>Grievance redress through stakeholder response mechanism</i>	23
3.4 ESSF requirements at a glance	24

<b>ANNEX A: BRAC'S AREA of WORK</b>	<b>26</b>
<b>ANNEX B: E&amp;S GUIDELINES APPLICABLE TO BRAC</b>	<b>28</b>
<b>ANNEX C: BRAC COMPLIANCE</b>	<b>35</b>
<b>ANNEX D: DOCUMENTS RELATED TO ESIA</b>	<b>52</b>
<b>ANNEX- E GENERIC OUTLINE FOR ENVIRONMENTAL MANAGEMENT PLAN</b>	<b>60</b>

## ACRONYMS AND ABBREVIATIONS

ADB	Asian Development Bank
ARAP	Abbreviated Resettlement Action Plan
CRC	Concept Review Committee
CSO	Community Service Organisations
DLO	Donor Liaison Office
EIA	Environmental Impact Assessment
E&S	Environmental and Social
EMP	Environmental Management Plan
ESA	Environment and Social Assessment
ESIA	Environmental and Social Impact Assessment
ESRN	Environment and Social Review Note
ESS	Environmental and Social Safeguard
ESSF	Environmental and Social Safeguard Framework
F &A	Finance & Accounts
FAO	Food and Agriculture Organisation
FPIC	Free, Prior and Informed Consent
GCF	Green Climate Fund
GEF	Global Environment Facility
IPF	Indigenous People's Framework
IPP	Indigenous People's Plan
IPPF	Indigenous People's Plan Framework
LAP	Land Acquisition Plan
LRP	Livelihood Restoration Plan
NGO	Non-Government Organisation
PIR	Project Implementation Review
PRC	Project Review Committee
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SIA	Social Impact Assessment
UNDP	United Nations Development Programme
UNEP	United Nations Environment Programme

## EXECUTIVE SUMMARY

This Environmental and Social Safeguard Framework (ESSF) has been formulated to affirm BRAC's commitment to sustainable development, and lays out the sustainability standards for the organisation and its implementing/executing partners. The framework focuses on BRAC's - a) projects and programmes, b) policies and strategies, c) facilities, management of operations, and d) mainstreaming of the idea of environmental sustainability in the operations of BRAC and its implementing/executing partners through an integrated approach in combining environmental, social and economic sustainability. It is expected to assist BRAC to anticipate and manage emerging environmental and social safeguard issues. BRAC in the past has worked with reputed organisations such as the World Bank, UN agencies and other international NGOs and complied with their relevant ESS policies. In the process BRAC has enhanced its capacity and has developed its own ESSF that would allow BRAC and its implementing partners to conform to the safeguard standards of reputed international organisations as well as national environmental and social safeguard regulations.

BRAC's ESSF contains two overarching principles (precautionary approach and human rights-based approach) and seven thematic safeguard standards (biodiversity conservation; resource efficiency, pollution prevention and management of chemicals and wastes; involuntary resettlement; indigenous peoples; labour and working conditions; protection of tangible cultural heritage; gender equality). Apart from promoting environmental and social sustainability the principles and thematic standards of BRAC's ESSF also serves a "do no harm" purpose as well as reflects a "do good" purpose.

The ESSF will assist BRAC to modify business practices by integrating standardised and structured sustainability measures across the organisation's activities and operation. The framework describes the requirements, processes and tools that will assist BRAC and its implementing partners to comprehensively commit to sustainability in BRAC's engagements. The framework provisions include project development, review and approval processes, as well as implementation, monitoring and evaluation, partnerships and legal agreements with BRAC implementing/executing partners, and stakeholder participation processes. The framework also provides an accountability framework including stakeholder response mechanism.

The framework is set as a working document and will be modified and improved as BRAC gains more experience in incorporating environmental and social safeguards into its work. With donors, governments and NGOs increasingly becoming aware of safeguarding and sustainability needs, it is important that BRAC demonstrates leadership in environmental sustainability and promotes synergies through collaboration across environmental and social sustainability.



**CHAPTER 1**  
**INTRODUCTION**

## 1.1 BACKGROUND

This Environmental and Social Safeguard Framework (ESSF) has been developed by BRAC, and is a keystone for BRAC's efforts towards sustainable development, along with its implementing partners. The ESSF sets out the scope and implementation modalities for identifying and avoiding or mitigating environmental and social risks, and also for tapping opportunities to enhance upon environmental and social safeguard outcomes. This framework focuses on safeguard requirements while BRAC's environmental policy include both the "do good" criteria in addition to the "do no harm" requirements embedded in this framework. However, it is to be noted that this ESSF also reflects a "do good" purpose apart from serving a "do no harm" purpose essentially.

This framework is consistent with the 'International Finance Corporation Performance Standards' developed for 'Interim Environmental and Social Safeguards of the Green Climate Fund' which promotes and guides harmonised approaches on environmental and social sustainability. This framework of BRAC is also fully in line with the relevant policies of the Global Environment Facility (GEF),-specifically the "Gender Equality Action Plan" and the "GEF Policy for Agency Minimum Standards on Environmental and Social Safeguards." In developing its ESS Framework, BRAC drew on lessons from the policies and guidelines of other entities in the UN system, most notably UNEP, UNDP, FAO and the World Bank Group, its own environment policy which has been developed concurrently, as well as other national and international development institutions.

## 1.2 ABOUT BRAC

BRAC is one of the largest non-governmental development organisations in the world measured by the coverage of people benefited, programme diversity, effectiveness, efficiency and number of employees involved. BRAC's journey began in 1972 in the newly sovereign Bangladesh, and over the course of its evolution, BRAC has been playing a role of recognising and tackling the many different realities of poverty.

**BRAC Vision:** A world free from all forms of exploitation and discrimination where everyone has the opportunity to realise their potential.

**BRAC Mission:** To empower people and communities in situations of poverty, illiteracy, disease and social injustice. The interventions aim to achieve large-scale, positive changes through economic and social programmes that enable men and women to realise their potential.

People living in poverty must have access to the tools to fight it across all fronts in order to rise out of it. BRAC has developed programme services in the areas of human rights **and** social empowerment, education **and** health, economic empowerment

and enterprise development, livelihood skill development trainings, environmental sustainability, climate change adaptation and mitigation, and also in humanitarian response, disaster preparedness and risk reduction.

BRAC operates social enterprises that are strategically connected to their development programmes, and form crucial value chain linkages which increase the productivity of the members’ assets and labour, and reduces risks of their enterprises. These enterprises, ranging from agriculture to handicrafts, also help to make us increasingly self-reliant. Gender equality, respect for the environment and inclusivity are themes crosscutting all of BRAC activities. To ensure that they are always learning and that their work is always relevant, BRAC has put in place training, research **and monitoring systems across all** its activities and financial checks and balances in the form of audits, both internal and external. BRAC has also opened its doors to the wider public as a knowledge centre, in an effort to develop national capacity in Bangladesh through BRAC University.

**Table 1: BRAC’s areas of work (See annex for details)**

Broad areas	Wellbeing and resilience	Expanding horizons	Economic development and social protection	Empowerment
Programmes	<ul style="list-style-type: none"> <li>Disaster management and climate change</li> <li>Health, nutrition and population</li> <li>Water, sanitation and hygiene</li> </ul>	<ul style="list-style-type: none"> <li>Education</li> <li>Migration</li> <li>Skills development</li> </ul>	<ul style="list-style-type: none"> <li>Agriculture and food security</li> <li>Integrated development</li> <li>Microfinance</li> <li>Enterprises and investments</li> <li>Targeting the ultra-poor</li> </ul>	<ul style="list-style-type: none"> <li>Community empowerment</li> <li>Gender justice and diversity</li> <li>Human rights and legal aid service</li> </ul>

### 1.3 STATEMENT OF COMMITMENT

BRAC is committed to avoiding, minimising or mitigating adverse environmental, social or economic impacts associated with the projects it supports. For this purpose, all proposed BRAC actions will gradually be subject to environmental, social and economic safeguards review and screening during preparation, and they will be designed, implemented, monitored and evaluated in accordance to relevant safeguards standards. This requirement will also be applied to the BRAC implementing/executing partners as they deliver work for which BRAC has overall responsibility of management and outcomes.

## 1.4 PURPOSE OF THE FRAMEWORK

The ESSF will primarily serve the following purposes:

- Enhance BRAC's preparedness for the implementation of the Post 2015 Sustainable Development Agenda through closer engagement with donors and partners to strengthen development aid by routinely integrating the environmental, social and economic dimensions related to its activities.
- Set standards of sustainability for the operations BRAC implements itself and for those that are implemented by BRAC's partners, thereby confirming BRAC's accountability to the people and governments of countries it operate, and to the GEF, GCF and other green funders.
- Assist BRAC to work in a safer and smarter manner, thereby minimising potential risks and harm while enhancing BRAC's capabilities and credibility.
- Allow BRAC to identify the full life-cycle costs of its operational choices and thus to operate more sustainably and improve efficiency over time.
- Enable BRAC to respond more promptly and effectively to emerging environmental, social and economic issues as an attractive and trusted implementing/executing partner.
- The framework is intended to cover the development and implementation of projects that BRAC undertakes or supports henceforth, not current or past activities.

## 1.5 TARGET AUDIENCE

This ESS framework has multiple target audiences. The first is BRAC's staff and management. The second is the range of implementing/executing partners through which BRAC accomplishes many of its objectives. The third are country (countries) where BRAC is operating and other entities to which BRAC would be accountable, such as the GEF and GCF, and other such development funds and development partners.

## 1.6 SCOPE OF THE FRAMEWORK

There are four main entry points for BRAC's ESS Framework:

- BRAC programmes and projects
- BRAC policies and strategies
- BRAC facilities, operations management, and
- BRAC's work to mainstream environmental sustainability across their system and policies.

## CHAPTER 2

# GENERAL PRINCIPLES AND THEMATIC ESSF REQUIREMENTS

The ESS principles and thematic safeguard standards for BRAC are narrated in this chapter. The principles noted herein are overarching and sets out requirements for all projects. On the other hand, the thematic safeguard standards are set out to identify and assess environmental and social risks pertaining to any project to be implemented by BRAC or any of its implementing partners. The established principles and thematic safeguard standards bolter each other and characterises BRAC’s safeguard and sustainability efforts. The principles basically outlines “how” and the safeguard standards outlines “what” for BRAC and its implementing partners to avoid, mitigate or minimise the potential risks.

## 2.1 ESS PRINCIPLES OF BRAC

**Precautionary approach** - BRAC will apply a science-based precautionary approach to its project/programme design and implementation. A project/programme approach should be science-based and must anticipate and address harm before it happens. Where there are threats of serious or irreversible damage, circumstances of not having hundred percent scientific certainties should not be used as a reason for avoiding cost-effective measures to prevent environmental degradation.

**Human rights-based approach (HRBA)** - BRAC’s ESSF is founded on a human rights-based approach to project management, including the rights of future generations. This means that stakeholder engagements and public participation starting from project preparation to its closure should be based on the following procedural human rights principles:

- ▶ **Equality and non-discrimination** - All individuals are equal by virtue of the inherent dignity of each as human being. All human beings are entitled to their human rights without discrimination in race, colour, sex, age, language, religion, political or other opinion, national or social origin, disability, property, birth or any other status.
- ▶ **Participation and inclusion** - Every person is entitled to actively and freely participate in, contribute to, and enjoy any civil, economic, social, cultural and political development in which human rights and fundamental freedom can be realised.

## 2.2 DETAILED THEMATIC ESSF REQUIREMENTS

While it is impossible to identify all relevant ESS issues, the ESS framework identifies key thematic safeguards and provides relevant minimum requirements under each thematic safeguard standard to consider at different stages throughout the life cycle of projects. The seven thematic areas that BRAC considers important and relevant are provided below with details on each of these standards:

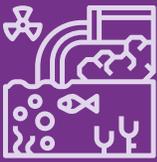
## Safeguard standard 1: Biodiversity conservation, natural habitats, and sustainable management of living resources



- BRAC will not support directly or indirectly any activity that will significantly convert or degrade critical natural habitats and will avoid significant conversion or degradation of habitats that are: legally protected; officially proposed for protection; identified by authoritative sources for their high conservation value, or recognised as protected by traditional local communities, where national legislation so allows.
- Before engaging in a project that could result in the conversion or degradation of non-critical natural habitats, BRAC will require: an analysis that shows there is no feasible alternative; an analysis that shows that the benefits of the project exceed the environmental costs; and, compensation for the loss of habitat, usually in the form of an offset.
- When planning activities in critical habitats, such as restoration or improved management, BRAC will ensure that the operation does not have potential serious adverse impacts on the biodiversity and ecosystem services for which the critical habitat was designated; the operation will not lead to a net reduction in the global, national or regional population of any critically endangered or endangered species and will ensure that they do not result in a net loss of biodiversity and ecosystem services by one or more of the following: avoidance of impact through identification and protection of set-asides; minimisation of habitat fragmentation, such as with biological corridors; preference given to citing physical infrastructure investments on lands where natural habitats have already been converted to other land uses; restoring habitats during operations and/or after operations, and providing biodiversity and ecosystem services offsets.
- BRAC activities should be legally permitted and consistent with any officially recognised management plans for the area.
- BRAC-supported activities will seek to avoid adverse impacts on soils, their organic content, productivity, structure and water-retention capacity, or to contribute to reversing land degradation.
- BRAC will implement measures to avoid the introduction or utilisation of invasive alien species, whether accidental or intentional; and will support activities to mitigate and control their further spread.
- BRAC will apply the precautionary approach in assessing and managing the impacts of all activities with potential adverse effects on biodiversity, natural habitats or ecosystem services.
- In projects that could affect biodiversity, natural habitats, or ecosystem services or that involves the preparation of protected areas or ecosystem management

plans, BRAC and/or its implementing/executing partners will consult with appropriate experts, potentially affected communities, the local government, local and national NGOs, or other stakeholders.

- With respect to impacts on priority ecosystem services of relevance to affected communities and where a BRAC project has direct management control or significant influence over such ecosystem services, adverse impacts should be avoided. If these impacts are unavoidable, BRAC project will minimise them and implement mitigation measures that aim to maintain the value and functionality of priority services.



## Safeguard standard 2: Resource efficiency, pollution prevention and management of chemicals and wastes

- BRAC projects will explore technically and financially feasible approaches for the efficient use of energy, water, and other resources and materials in line with the concept of cleaner production and for using raw materials, energy, and water sustainably.
- BRAC projects will consider alternatives and implement technically and financially feasible options to reduce project-related GHG emissions, including alternative locations, the use of renewable or low-carbon energy sources, sustainable agriculture, forestry and livestock management practices.
- When a BRAC project includes substantial consumption of fresh water, BRAC will ensure that it does not have significantly adverse impacts. The project should consider alternative water supplies or water consumption offsets to reduce the total demand for water resources within the available supply.
- BRAC projects will promote the use of demand driven, ecologically based biological or environmental pest management practices and the reduction of synthetic chemical pesticides in accordance with national and international (the Basel, the Rotterdam and the Stockholm Conventions) guidelines.
- BRAC and implementing/executing partners will select chemical compounds that are low in human toxicity, known to be effective against the target organisms and to have minimal effects on non-target organisms.
- Pesticides will be handled, stored, applied and disposed of in accordance with the FAO International Code of Conduct on Distribution and Use of Pesticides.
- BRAC will avoid or minimise the potential for community exposure to hazardous materials and substances that maybe released by a project. Where there is a potential for the public to be exposed to chemical hazards, BRAC projects will exercise special care to avoid or minimise their exposure by modifying, substituting, or eliminating the condition or material causing the potential hazards.

### Safeguard standard 3: Involuntary resettlement



- BRAC projects/programmes will assess all viable alternative project designs to avoid, where feasible, or minimise the need for resettlement.
- BRAC projects/programmes will avoid promoting or endorsing forced evictions.
- BRAC projects/programmes will identify, assess and address the potential economic and social impacts that are caused by the involuntary taking of land - in terms of shelter, assets, income sources or means of livelihood - or by the involuntary restriction of access to legally designated parks and protected areas; impacts and resettlement options should be identified through socio-economic surveys of the project-affected persons, host communities and local community service organisations (CSOs), as appropriate.
- BRAC projects/programmes will restore and, whenever possible, improve the livelihoods and living standards of directly affected people. Displaced people and communities should be provided opportunities to derive appropriate development benefits from a project. Particular attention must be given to the needs of directly affected people who are vulnerable, especially those below the poverty line, the landless, the elderly, women and children, indigenous people, ethnic minorities, people with special needs, or other displaced people who may not be protected through national land compensation legislation.
- BRAC projects/programmes will inform affected people to be resettled of their rights, consult them on options, and provide them with technically and economically feasible alternatives and assistance. Compensation processes will consider:
  - ▶ Prompt compensation is provided at full replacement cost for loss of assets attributable to the project;
  - ▶ Compensation is paid and relocation is properly carried out before land clearing, construction, or access restrictions begin and assistance is provided during relocation and residential housing, or housing sites;
  - ▶ Support for the transitional period, including development assistance, is provided;
  - ▶ When overall impact on livelihoods is minor, cash compensation for land can be considered;
  - ▶ Residential site includes adequate civic infrastructure and community services;
  - ▶ Compensation standards will be transparent and applied consistently to all directly affected people;
  - ▶ When livelihood of directly affected people are land-based, or where land is in collective ownership, compensation in the form of land for land is preferable when possible;

- ▶ Displacement will not occur until compensation has been made available and, where applicable, resettlement sites and relocation assistance has been secured.
- BRAC projects/programmes will provide resettlement assistance in lieu of compensation for land to help restore the livelihood of those to be resettled when they do not have formal legal rights or claims to lands.
- BRAC projects/programmes will ensure that communities and people directly affected by resettlement are engaged in the planning and decision-making processes as well as during implementation and monitoring of the resettlement. Engagement with these stakeholders is critical when developing and implementing/executing the procedures for determining eligibility for compensation benefits and development assistance and for implementing appropriate and accessible grievance mechanisms. All relevant information, including draft resettlement plans or other draft management plans to address involuntary resettlement if necessary, including options and alternatives for resettlement, compensation, and livelihood restoration, and documentation of the stakeholder consultation process will be disclosed in a timely manner, before review by the project review committee (PRC), in a place accessible to key stakeholders including project affected groups and CSOs in a form and language understandable to them.
- BRAC projects/programmes will ensure that resettlement plans are implemented before project completion and displacement or restriction of access is carried out only after the resettlement entitlements are provided.
- BRAC project/programme will assess whether the resettlement plans have been carried out as planned and have achieved intended results.



#### Safeguard standard 4: Indigenous people

- BRAC will avoid projects/programmes which undermine or inadvertently weaken the rights and livelihood of indigenous people.
- When indigenous people may be affected by a BRAC-supported project/programme, BRAC and its implementing/executing partners will carry out a relevant impact assessment; identify measures to avoid, minimise and mitigate any negative impacts; and agree on an approach that are acceptable to the potentially affected indigenous people. The indigenous people should be informed of their rights and all available options in terms of their benefits and mitigation measures.
- When indigenous people may be affected by a BRAC-supported project/programme, BRAC and its implementing/executing partners will prepare an indigenous people's plan (IPP). The planning process will involve indigenous people in an assessment of potential socio-economic impacts and risks, and

apply the principle of free, prior and informed consent (FPIC). Full consideration should be given to options preferred by the potentially affected indigenous people and to options designed to enable indigenous people to benefit from the project in a culturally appropriate and feasible manner, including through the legal recognition of customary or traditional land tenure and management systems and collective rights, if appropriate.

- Key elements of the IPP should include: an action plan to ensure and follow through that potential; adverse impacts on indigenous people are avoided; adverse impacts are minimised and/or mitigated, or compensated for in a culturally appropriate manner; a plan for consultations throughout the project period; a stakeholder response process; a budget and financing arrangement to deliver the plan; and mechanisms for monitoring and evaluation.
- Where the restriction of access of indigenous people to legally designated parks and protected areas is not avoidable, the BRAC project/programme will ensure that potentially affected indigenous people fully and effectively participate in the design, implementation, monitoring and evaluation of management plans for such parks, protected areas and species and that these people will share equitably in benefits from the parks and protected areas.
- The BRAC project will disclose IPPs, impact assessments and other consultation documents to key indigenous people potentially affected by the project in a timely manner, ahead of PRC review, and in a form, language that is understandable and place that is accessible to key stakeholders, including project affected groups and associated CSOs.
- The BRAC project/programme will involve experts who understand issues related to indigenous people in monitoring IPPs or Indigenous People's Plan Framework's (IPPFs) implementation and will carry out mitigation measures, if needed, in a participatory manner.

#### **Safeguard standard 5: Labour and working conditions**

- Workers, including migrant workers, of the BRAC implementing/executing partners will be provided with clear and understandable information on their rights under national law and any collective agreements that may be in place. The employer will respect the terms of any collective agreement and, where such agreements do not exist or do not address working conditions, will provide reasonable working conditions and terms of employment.<sup>1</sup>

<sup>1</sup> Reasonable working conditions and terms of employment could be assessed by reference to (i) conditions established for work of the same character in the trade or industry concerned in the area/region where the work is carried out; (ii) collective agreement or other recognised negotiation between other organisations of employers and workers' representatives in the trade or industry concerned; or (iii) conditions established by national law.



- The implementing/executing partner's policy will articulate principles of non-discrimination and equal opportunity in employment, accommodations, working conditions or terms of employment, access to training, job assignment, promotion, termination of employment, and disciplinary practices.
- The implementing/executing partners will take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women, children, and migrant workers.
- The implementing/executing partner will not employ forced or trafficked labour, including bonded labour.
- The implementing/executing partners will not employ children in any manner that is exploitative, hazardous, or potentially harmful to the child's health or development, or that will interfere with his or her education. Children under the age of 18 will not be employed in hazardous work.
- The implementing/executing partner will provide a safe and healthy working environment. Responsibilities will include identifying potential hazards to workers, providing preventive and protective measures and equipment, documenting and reporting of accidents and diseases, and planning for emergency response.



#### Safeguard standard 6: Protection of tangible cultural heritage

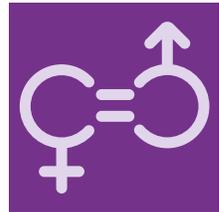
- A project/programme will avoid adverse impacts on critical tangible cultural heritage.<sup>2</sup> When avoidance is not feasible, the safeguard management plan must include measures to minimise or mitigate those adverse impacts.
- BRAC-supported operations must be in compliance with relevant national law and the host country's obligations under the Convention Concerning the Protection of the World Cultural and National Heritage.
- For any project/programme involving land clearing or excavation in which there are indications of undetected physical cultural heritage, a "chance finds" procedure must be put in place.
- Where a project/programme proposes to use tangible cultural heritage of local communities for commercial or other purposes, the communities must be informed of their rights under international and national laws and of the scope, nature and consequences of the project/programme.

<sup>2</sup> Tangible cultural heritage is defined by UNESCO as movable cultural heritage (paintings, sculptures, coins, manuscripts); immovable cultural heritage (monuments, archaeological sites) and underwater cultural heritage (shipwrecks, underwater ruins and cities), which are considered worthy of preservation for the future. These include objects significant to the archaeology, architecture, science or technology of a specific culture (The Convention Concerning the Protection of the World Culture and Natural Heritage. The General Conference of the United Nations Educational, Scientific and Cultural Organization meeting in Paris, 17 October to 21 November 1972, at its 17th session).

- Consultation with corresponding government authorities, relevant UN entities, relevant NGOs, local communities and relevant experts will take place in the identification and protection or management of tangible cultural heritage that could potentially be negatively affected by a BRAC project/programme.
- Where a BRAC project/programme site contains cultural heritage or prevents access to previously accessible cultural heritage sites being used by, or that have been used by, potentially affected communities within living memory for long-standing cultural purposes, the BRAC project/programme should allow continued access to the cultural site or provide an alternative access route, subject to overriding health, safety, and security considerations.
- BRAC project/programme should incorporate mitigating measures to address adverse impacts and to enhance positive impacts on tangible cultural heritage, in particular through site selection and design.

### Safeguard standard 7: Gender equality

- BRAC will not support projects/programmes that result in unequal opportunity and treatment between women, men and third gender at national, regional and global levels.
- BRAC will assess potential roles, benefits, impacts and risks for women, men and third gender in the preparation and implementation of projects/programmes undertaken or supported by BRAC, with the aim of supporting equal opportunity for women, men and third gender. In this context, BRAC will avoid, minimise, and/or mitigate any adverse gender differentiating impacts or risks from its projects/programmes, as identified through the environmental, social and economic safeguard screening processes.



## **CHAPTER 3**

# **PROCEDURES FOR IMPLEMENTING THE ENVIRONMENTAL AND SOCIAL SAFEGUARD FRAMEWORK**

This chapter discusses tools, procedures and guidelines for implementation of the ESSF. BRAC will integrate implementation of the ESSF within project/programme review, approval and management cycle. Implementation procedures for the safeguard provisions established will remain the same regardless of the type of project. However, the extent and nature of examination will be different and will be subjected to potential impacts associated with any given project/programme.

### **3.1 USE OF PARTNER ORGANISATION'S SAFEGUARDS SYSTEMS**

BRAC and its implementing/executing partners are required to respect and comply with BRAC's environmental and social policies. They should place a priority on the prevention of harmful environmental, social and economic impacts. If such prevention is not possible, they should minimise adverse impacts and enhance positive impacts through adequate environmental, social and economic planning and management, which would include mitigation measures, monitoring, institutional capacity building, and implementation budget and schedule.

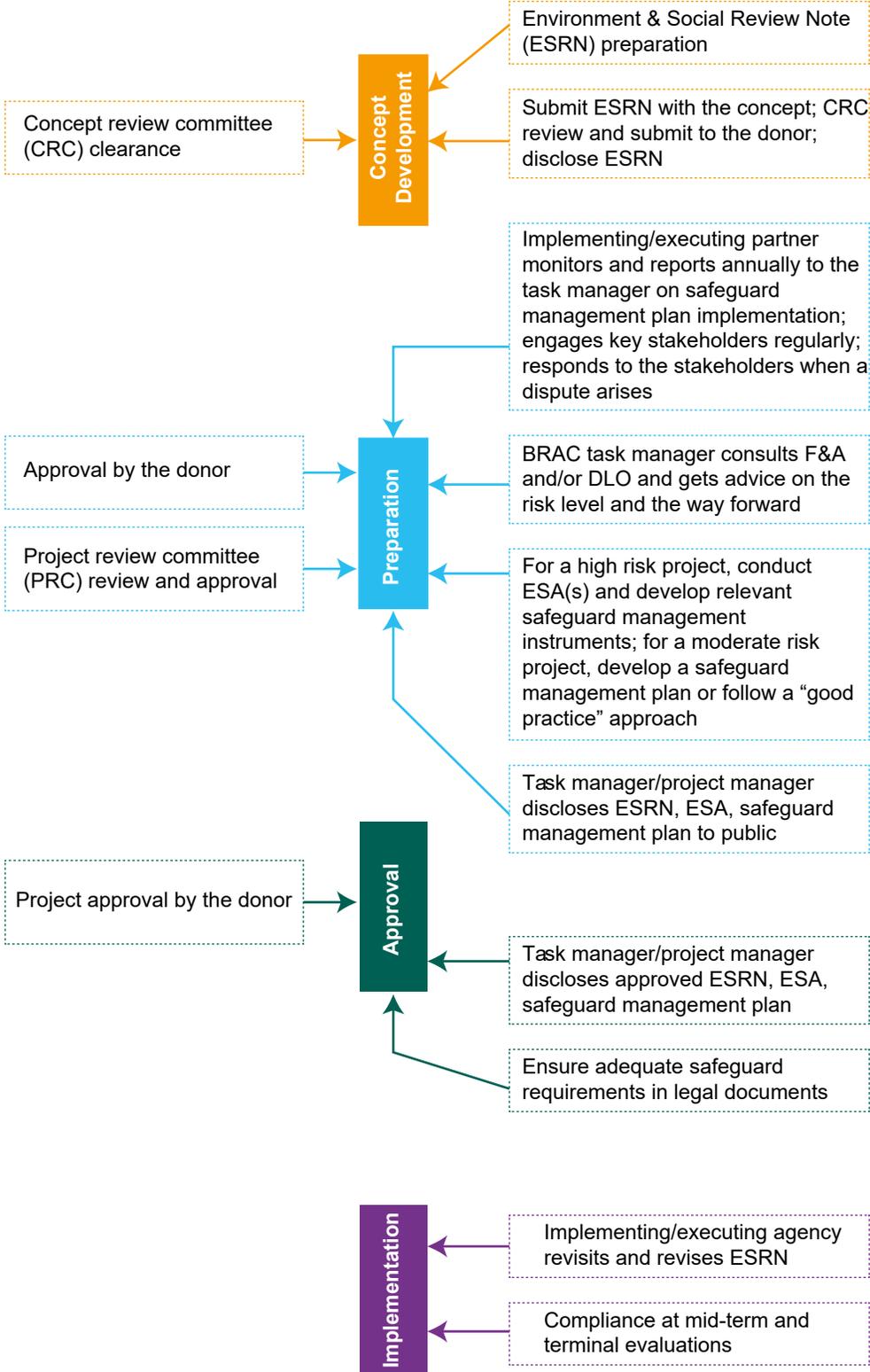
BRAC will consider the use of a partner's safeguards system if BRAC has determined that such system complies with BRAC's overarching and thematic safeguard standards and objectives. BRAC will review relevant policies and the host country's or partner's capacity during the project preparation and review phases up to the time of full project/programme approval. In so doing, BRAC may take into account relevant policies that were developed by other reputable international organisations, such as the World Bank, UN agencies and other national and international NGOs. A brief review of such policies and guidelines has been provided in annex.

Where BRAC is considering the use of a partner system, this fact will be disclosed and justified prior to the project's submission for review and approval. A know-your-partner meeting should be conducted between the partner organisation and BRAC at this stage. During this meeting, BRAC shall disclose: (a) BRAC's business process with ESSF integration; b) E&S risk ratings; c) Appraisal report preparation; d) Terms of reference for initial environmental examination (IEE) studies as per ESSF; e) Site visit requirement; f) Conditions precedent and subsequent to disbursement (if applicable).

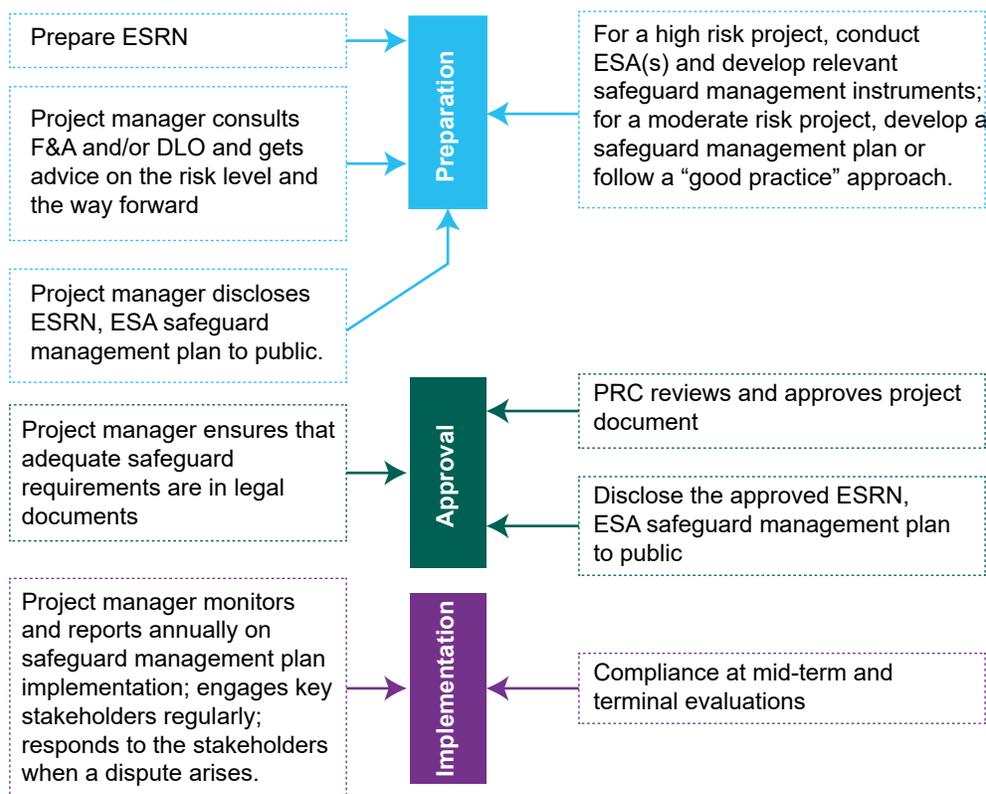
### **3.2 SAFEGUARDS IN THE BRAC PROJECT CYCLE: DEVELOPMENT, IMPLEMENTATION, MONITORING AND EVALUATION**

The key steps in applying the safeguards in the BRAC project/programme cycle are shown in Figure 3-1 for projects/programmes that require concept approval by the donor (eg, Global Environmental Facility or GEF and Adaptation Fund projects/programmes) and Figure 3-2 for those that do not follow such procedure.

**Figure 1: ESS requirements within the BRAC project cycle for projects that require concept approval by the donor (adapted from UNEP 2015)**



**Figure 2 ESS Requirements within BRAC project cycle for projects that are subject to BRAC’s internal approval only (adapted from UNEP, 2015)**



### 3.2.1 Environmental and social screening

Screening is the process for determining the appropriate level of environment and social assessment and the management approach, proportional to potential risks and to direct, indirect, cumulative and associated impacts, as relevant. It is based on the project/programme description, the description of the physical, biological, socio-cultural and economic setting, and the potential impacts and risks that can be foreseen at an early stage. Screening is also the first point in the identification of which of the thematic standards described in Chapter 2 will apply to the proposed project.

The risk rating criteria for ESSF harmonises requirements of:

- GOB’s ECR-97 Green, Orange-A, Orange-B and Red categories
- Bangladesh Bank’s ERM risk rating approach
- Criteria for classifying projects as Category A/B/C according to ADB’s SPS
- Capacity of the project proponent to manage E&S risks

A desk review of the project documents is recommended before evaluating the risk rating of the project. Environmental and social impacts will be screened using an Environment and Social Review Note (ESRN). An ESRN identifies potential environmental and

social risks of a proposed project/programme and assesses the potential safeguard risks and their levels of significance in order to address them adequately by avoiding, mitigating or minimizing them in a structured, consultative and planned manner. Early and broad stakeholder consultation can be done to improve identification of potential safeguard risks and the preparation of a related ESRN.

The proposed risk rating criteria for ESRN is provided below in Table 2-1 and 2-3

**Table 2 Proposed Risk Rating Criteria for ESRN**

Risk rating criteria	Yes	No
For any new project		
<ul style="list-style-type: none"> <li>For new projects, does the project/programme have any pending compliance such as location and environmental clearance based on its category (Red, Orange-A, Orange-B and Green), from the Department of Environment (DoE)?</li> </ul>		
<ul style="list-style-type: none"> <li>Is the project/programme located in the immediate vicinity (likely to cause adverse impact) of environmentally critical areas (national parks, wetlands, wildlife habitats, important bird areas, and protected areas)?</li> </ul> <p>Ref: Draft Environmentally Critical Areas Rules, 2010</p>		
<ul style="list-style-type: none"> <li>Does the project/programme construction and/or operation lead to environmental impacts that are diverse<sup>3</sup>, irreversible<sup>4</sup> and/or unprecedented<sup>5</sup> in nature?</li> </ul> <p>Refer to IEE/EIA reports if available or Environmental Due Diligence (EDD) during site visit, to answer this question</p>		
<ul style="list-style-type: none"> <li>Does the project require involuntary resettlement that results in loss of land or livelihood or physically displaces more than 200 people?</li> </ul>		
<ul style="list-style-type: none"> <li>Is the project/programme site on or in immediate vicinity of socially vulnerable or indigenous people owned or occupied land and has the potential to cause an adverse impact on their culture and identity?</li> </ul>		
<ul style="list-style-type: none"> <li>Is the proposed project likely to increase vulnerability to climate change now or in the future and/or exacerbate climate change (by significant<sup>6</sup> greenhouse gas emissions)?</li> </ul>		

- 
- 3 Diverse impacts – impacts resulting on multiple E&S components or receptors over a varying time and spatial scale (eg, activities that can cause large-scale adverse impacts on local air quality, noise levels, generation of hazardous wastes as well as nuisance to community)
  - 4 Irreversible impacts – impacts on E&S components that, in all practical terms are permanent in nature and cannot be reversed in spite of the removal of the causal stress factor (eg, construction or change in land use that permanently alters the natural drainage or destroys habitats used by migratory birds)
  - 5 Unprecedented impacts – are impacts that are first of its kind in terms of available knowledge of their potential to cause harm to the E&S components and their effective mitigation (eg, impact of noise pollution on an endangered faunal species in a geographical region where no prior studies are available on impact tolerance and response of the species)

Risk rating criteria	Yes	No
<b>E&amp;S Capacity of the implementing and/or partner organisation</b> ( <i>applicable for BRAC itself when it is the implementing organisation</i> )		
• Does the partner/implementing organisation have a documented policy or framework on E&S safeguard?		
• Does the partner/implementing organisation have dedicated human resource to address E&S performance?		
• Has the partner/implementing organisation established and implemented environmental, health & safety management systems and social accountability systems and/ or gender policy for the project SPV or in the parent company?		

BRAC's screening will place a proposed project in one of three categories:

**Table 3 Risk categories**

Risk category	Definition
<b>High risk</b>	Potential for significant negative impacts, possibly irreversible; requires full impact assessment/environmental, social impact assessment (ESIA) or comparable study to develop an effective safeguard management plan. For example, projects/programmes that involve significant quantities of hazardous substances are normally considered a priority as high risk. Every safeguard management plan should be carefully monitored and reported to the stakeholders during project implementation. <b>Based on Table 2 above, if any question numbered 1 to 6 is answered as Yes, the Project E&amp;S Risk is rated "High".</b>
<b>Moderate risk</b>	Potential for negative impacts, but those that are less significant in scale; some potential risks manageable through standard "good practice" during project implementation without a separate management plan; other potential risks requiring limited environmental, social or economic analysis to determine the potential impacts identified through the screening. These projects/programmes may need to develop a safeguard management plan to monitor and manage the identified risks. <b>If all the questions numbered 1 to 6 are a NO and at least one of the questions numbered 7 to 9 is a NO, then the E&amp;S risk is moderate.</b>
<b>Low Risk</b>	Potential for negative impacts negligible; requires no further study or impact management. <b>If all questions numbered 1 to 6 are a No and all questions rated 7 to 9 are a Yes then the Project E&amp;S Risk is rated as "Low".</b>

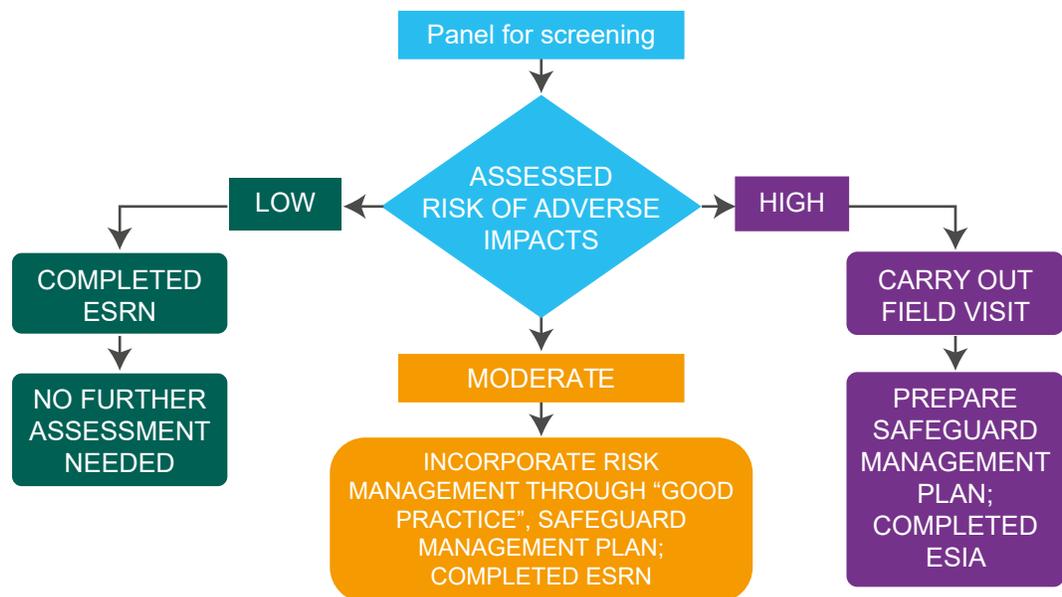
6 In regards to CO2 significant emissions' corresponds generally to more than 25,000 tons per year (from both direct and indirect sources): UNDP's Social and Environmental Screening Procedure

This initial screening, based on desk based research and review by the concerned programme/ project team, is inevitably based on imperfect and incomplete information. Estimating the degree of “significance” of potential negative impacts is central to determining the level of risk. It depends considerably on an informed professional judgment regarding the significance and complexity of potential impacts. Significance and complexity are functions of magnitude or intensity, geographic extent, duration of the potential risk, reversibility, probability and manageability.

All BRAC projects/programmes, with donors’ consent of the concepts to further process, should go through the safeguard screening during the full project preparation. If a screening places a project in the category of low risk, the review process ends at the screening stage. If an initial screening finds that additional study is necessary because of inadequate information, and/or a project/programme is placed in high risk category, the concerned programme/project team will conduct a field visit of the proposed site. Subsequently, BRAC will follow up with a review of the ESRN rating through an environmental and social impact assessment (ESIA), which will subsequently be incorporated into the safeguard management instrument, project document and legal documents (Figure 3).

Often, all the requisite safeguard measures that the project implementers will have to carry out will not be known up front. It is important that all moderate to high risk projects/ programmes are continuously monitored during implementation for indications in the need for additional environmental, social or economic safeguard measures.

**Figure 3 The screening process**



### **3.2.2 Preparation of safeguard assessment and management plans prior to project/programme approval**

**Environmental, social impact assessment (ESIA) for high risk projects/programmes:** An ESIA (annex) provides the scope, complexity and degree of the potential impacts, which helps to guide the project in avoiding, mitigating and/or minimising them. The preparation of a sound ESIA during project preparation helps to identify and address potentially significant environment and social risks. This could avoid potential problems that could otherwise cause substantial delays, significant costs, public tension or adverse reputational risks to BRAC. It is to be noted that ESIA needs to be conducted for any ‘high risk’ rated projects/programmes irrespective of it being ‘greenfield’ or ‘brownfield’ projects/programmes.<sup>7</sup>

ESIAs should ensure that projects/programmes do not inadvertently undermine national requirements or contravene international obligations. Assessments of potential impacts must be coordinated or harmonised with national requirements and procedures that apply to the relevant project. BRAC or its implementing/executing partner needs to compare national requirements, international obligations and those of BRAC and adopt the more stringent of ESS requirements.

### **3.2.3 Safeguard management plans for high and moderate risk projects/programmes**

If the screening process concludes that potential impacts are negligible or manageable through a standard “good practice” approach, this framework does not require the development of any separate management plan. Otherwise, separate ESS management plans will need to be prepared.

A site and context specific safeguard management plan is normally a byproduct of an ESIA. However, it can be prepared as a stand-alone risk management instrument without carrying out an ESIA. This is normally the case for projects/programmes in the

---

7 The term Greenfield is used in construction and development to reference land that has never been used (eg, green or new), where there is no need to demolish or rebuild any existing structures. The term Greenfield project means to start a project without the need to consider any prior work. Greenfield land is undeveloped land in a city or rural area either used for agriculture, landscape design, or left to evolve naturally. These areas of land are usually agricultural or amenity properties being considered for urban development. Greenfield land can be unfenced open fields, urban lots or restricted closed properties, kept off limits to the general public by a private or government entity.

Brownfield is a term which applies generally to previously used land or to sections of industrial or commercial facilities that are to be upgraded, or areas that have been developed but left abandoned or underused. Such land may have been contaminated with hazardous waste or pollution or is feared to be so. Once cleaned up, such an area can become host to a business development such as a retail park. Land that is more severely contaminated and has high concentrations of hazardous waste or pollution does not fall under the Brownfield classification.

moderate risk category, where the typical impacts of the operation under review are relatively well understood through stakeholder consultations or field visits.

Safeguard management plans should identify the actions necessary to avoid adverse impacts, and the agencies or organisations responsible for implementing and funding those actions. The management approach must be site-specific and explain the measures for mitigation, locations, target communities, monitoring and institutional capacity development, implementation schedules, and cost estimates.

A specific management instrument- either an indigenous people's plan (IPP), indigenous people's plan framework (IPPF), resettlement action plan (RAP), abbreviated resettlement action plan (ARAP) or land acquisition plan (LAP), livelihood restoration plan (LRP) or resettlement policy framework (RPF) may be required if indigenous people or resettlement concerns are triggered.

### **3.2.4 Project review committee (PRC) approval and clearance of the safeguard instruments**

Final approval of projects/programmes by BRAC's review committee, possibly BRAC programme coordination committee (PCC), will include reviewing the relevant project/programme documents and safeguard instruments, if applicable, based on risk rating for ESRN (section 29 and 30, table 2 and 3) to ensure that there is consistency among these documents and that the project/programme management approaches are feasible and practical to meet the environment and social safeguard standards. Again, for 'high risk' rated projects, and perhaps for 'moderate risk' rated projects PCC will review the required environmental, social impact assessment (ESIA), an effective safeguard management plan or 'good practice', as applicable. Location Clearance Certificate (LCC) and Environmental Clearance Certificate (ECC) need to be obtained from Department of Environment (DoE) under the Ministry of Environment and Forest (MoEF) based on the environmental impact assessment (EIA) for all industrial units or projects/programmes, as per the Environmental Conservation Rules 1997 (see Annex B-1). The review committee will also review the capacities of the potential implementing/executing partners for their level of compliance with the safeguard requirements of BRAC. Legal agreements with implementing/executing partners will contain language necessary for ensuring the implementation of all relevant safeguards.

### **3.2.5 Mitigation, management and monitoring of impacts during project implementation**

During project/programme implementation, project managers and implementing/executing partners are responsible for ensuring that the actions specified in safeguard management plans are carried out, and for reporting regularly on compliance with these requirements via progress reports and the project implementation reviews (PIRs) for

Green Climate Fund (GCF) projects/programmes. Independent experts may continue to be involved in the monitoring of projects/programmes and in ensuring compliance with the project safeguard management plans. Safeguard management plans should be reviewed periodically and updated, and adjusted as needed.

At the mid-term of a project/programme, the mid-term review or mid-term evaluation will assess whether the environmental, social and economic risks are being vigilantly managed and monitored, and whether the BRAC ESS requirements have been complied with. Corrective measures will be proposed as relevant. At the end of the project, the terminal evaluation will undertake a similar exercise. It will also assess long-term impacts, if relevant.

BRAC will monitor the projects/programmes it supports for compliance with safeguard management and enhancement measures, by means of self-monitoring reports from implementing/executing partners as well as, when appropriate, supervision missions by BRAC staff or external experts.

### **3.3 ACCOUNTABILITY MECHANISM FOR SAFEGUARDS, INCLUDING DISCLOSURE AND STAKEHOLDER RESPONSES**

#### **3.3.1 Access to information**

BRAC adheres to the principle of access to information, public participation in decision-making and access to justice in environmental matters, based on Rio Principle. This principle includes early consultation, access to information and the adequate opportunity to review materials and present comments prior to decisions. BRAC will disclose environmental, social and economic risk assessments, stakeholder consultation reports, and impact assessments and safeguard management plans as identified in this chapter. The Access to Information policy will be regularly updated and be applicable to all BRAC safeguard standards.

Engaging stakeholders: Effective implementation of this framework depends in part and on varying meaningful engagement of stakeholders. Stakeholders can engage in a meaningful way only if they are appropriately informed. BRAC will disclose documentation related to ESSF implementation according to the guidelines below and expects its implementing/executing partners to do the same, in a format and language understandable to the stakeholders concerned.

Disclosure of safeguard information: BRAC will disclose and allow affected communities the opportunity to review and comment on these documents before the finalisation of the project documents. Comments and suggestions received should be responded to or incorporated in the relevant project approach and risk management plans. BRAC will address all communications from stakeholders pursuant to BRAC's disclosure of safeguards information in the course of project formulation and before project review.

Disclosure procedures during project/programme implementation: If a project is revised or its mid-term evaluation identifies new and additional issues, or concludes that the safeguard management instrument was not fully implemented, then the management plan may need to be redone and re-disclosed. Implementation and monitoring of safeguard management instruments should be reported and disclosed at least once a year respecting the conditions laid in the paragraph above. Outcomes of any stakeholder response or non-compliance review will also be made publicly available.

### **3.3.2 Grievance redress through stakeholder response mechanism**

BRAC projects/programmes must include procedures to keep the public informed about upcoming activities, as well as to receive and register communications from the public, to assess the issues raised and determine how to address them, to provide and document responses to public communications, and to make any appropriate adjustments in the management of the respective operation.

BRAC and its implementing partners must also address compliance concerns and other grievances including dissatisfaction and adverse impacts on people arising from any project/programme promptly, and even after the closure of a project/programme. BRAC will redress grievance through a stakeholder response mechanism. Existence of a mechanism will be disseminated to the affected people through printed handouts providing details of the structure and process in redressing grievances, and also the mechanism will be made available to the public on the BRAC website.

This grievance mechanism, while respecting the national privileges and immunities, will be structured to resolve concerns immediately and at the lowest possible level of BRAC's structure (eg, within the responsible division or local or regional office) using a transparent consultative process that is in accordance with standards of reputed international organisations such as UN standards, culturally appropriate and readily accessible.

BRAC's stakeholder response mechanism will elaborate on the scope, requirements and procedures for filing complaints and addressing disputes. BRAC's stakeholder response mechanism is to facilitate easy accessibility to BRAC by affected stakeholders and to respond to complaints in an independent, transparent and timely manner. BRAC will register all complaints and create a publicly accessible system for reporting on the progress and outcomes of all complaints to the interim accountability system.

### 3.4 ESSF REQUIREMENTS AT A GLANCE

To ensure safeguard management, BRAC's ESSF has been structured to reflect the following:

- ▶ Each project/programme will have to go through a screening process as early as possible which will establish the extent and type of environmental assessment required.
- ▶ Conducting an environmental assessment for each proposed project/programme to identify potential impacts (direct, indirect, cumulative, and induced) and risks too (physical, biological, socio-economic), and physical cultural resources as well in the context of the project's area of influence. Assess potential trans-boundary and global impacts (ie, climate change).
- ▶ Avoid, and where avoidance is not possible, minimise, mitigate, and/or offset adverse impacts and enhance positive impacts by means of environmental planning and management. Prepare an environmental management plan (EMP) that includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or organisational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators. Key considerations for EMP preparation include mitigation of potential adverse impacts to the level of no significant harm to third parties, and the Polluter Pays Principle.
- ▶ Carry out meaningful consultation with affected people and facilitate their informed participation. Ensure women's participation in consultation. Involve stakeholders, including affected people and concerned non-government organisations, early in the project preparation process and ensure that their views and concerns are made known to and understood by decision makers and taken into account.
- ▶ Disclose a draft and the final environmental assessment (including the EMP) in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders.
- ▶ Implement the EMP and monitor its effectiveness and document monitoring results.
- ▶ Do not implement project activities in areas of critical habitats, unless (i) there are no measurable adverse impacts on the critical habitat that could impair its ability to function, (ii) there is no reduction in the population of any recognised endangered or critically endangered species, and (iii) any lesser impacts are mitigated. In an area of natural habitats, there must be no significant conversion or degradation, unless (i) alternatives are not available, (ii) the overall benefits from the project substantially outweigh the environmental costs, and (iii) any conversion or degradation is appropriately mitigated. Use a precautionary approach to the use, development, and management of renewable natural resources.

- ▶ Apply pollution prevention and control technologies and practices consistent with international good practices as reflected in internationally recognised standards such as the World Bank's Environmental, Health and Safety Guidelines.
- ▶ Provide workers with safe and healthy working conditions and prevent accidents, injuries, and disease. Establish preventive and emergency preparedness and response measures to avoid, and where avoidance is not possible, to minimise, adverse impacts and risks to the health and safety of local communities.
- ▶ Conserve physical cultural resources and avoid destroying or damaging them by using field-based surveys that employ qualified and experienced experts during environmental assessments.

## ANNEX A

# BRAC'S AREA OF WORK

BRAC believes that poverty is a system and its underlying causes are manifold and interlinked. Some of these linkages are obvious, for example, a day's wage forgone because of illness or resources lost to a natural disaster. Others play a more indirect role in perpetuating poverty, such as lack of awareness about laws and rights can lead not only to outright exploitation, but also encourage a lack of accountability on the part of the state to cater to its most vulnerable citizens.

In order for people to come out of poverty, they must have the tools to fight it across all fronts. BRAC has, therefore, developed support services in the areas of human rights and social empowerment, education and health, economic empowerment and enterprise development, livelihood training, environmental sustainability and disaster preparedness.

BRAC operates social enterprises that are strategically connected to its development programmes, and form crucial value chain linkages which increase the productivity of its members' assets and labour, and reduce risks of their enterprises. These enterprises, ranging from agriculture to handicrafts, also help to make us increasingly self-reliant.

Gender equality, respect for the environment and inclusivity are themes crosscutting all of BRAC activities.

To ensure that we are always learning and that our work is always relevant, BRAC has put in place training, research and monitoring systems across all its activities and financial checks and balances in the form of audits. As a knowledge centre, BRAC has opened its doors to the wider public in an effort to develop national capacity in Bangladesh through BRAC University. BRAC's programmes range from disaster management and climate change; health, nutrition and population; water, sanitation and hygiene; education; migration; agriculture and food security; integrated development; microfinance; enterprises and investments; targeting the ultra poor; community empowerment; gender justice and diversity; human rights and legal aid service; to support programmes like governance, management and capacity building.

## ANNEX B

# E&S GUIDELINES APPLICABLE TO BRAC

## **B-1 Environmental and social regulatory framework in Bangladesh**

To assess the environmental regulatory framework in Bangladesh, it can be accessed from the perspective of waste management, environmental clearance for industries, health and safety and other environmental policies, rules and acts.

### **Waste management**

The concept of 3R (Reduce, reuse, recycle) was incorporated in December 2010 by Department of Environment (DoE) as National 3R Strategy. As a result, it encourages the private sector to put higher emphasis on 3R related projects/programmes to collectively help develop an infrastructure for communities and industries.

MoEF's Dhaka Environment and Water (DEW) Project, developed by DOE and the Local Government Engineering Department (LGED), is such a project which concentrates on Common Effluent Treatment Plants (CETPs) in Dhaka.

### **Environmental clearance**

The Environmental Conservation Rules 1997 (ECR-97) provides details about obtaining Environmental Clearance (EC) Certificate for industrial units or projects/programmes.

The industrial units or projects/programmes are classified as Green, Orange-A, Orange-Band Red categories according to their performance and impact. The industrial part falling under Green Category are regarded safe and issued Environmental Clearance Certificate by DoE.

The Environmental Impact Assessment (EIA) is to be done to issue a Location Clearance certificate (LCC) and Environmental Clearance Certificate (ECC) after reviewing the EIA by DoE. DoE has definite guidelines for formulating EIAs for specific industrial projects/programmes.

### **Health and safety**

Government of Bangladesh had Factories Act (1965) and Factories Rules (1979) which was later replaced by Labour Code (2006) to ensure health and safety measures. The details of safety for working with machinery, tools, pressure vessels, industrial processes, factory units were outlined in Factories Act and Rules. Labour Code (2006) is the improvised version of Factories Rules and Act since its covers a wider range of area. The new code is inclusive of the establishments which not only includes factories but also shops, hotels, restaurants, cinema and certain kinds of offices.

According to the Factories Rules and Act, the factory inspectors could prosecute criminal cases against industrial organisations. But in the new code this right has been

extended to a wider range of people. These kinds of improvisations are very aligned with BRAC's initiatives for social protection and community empowerment.

## **Environmental policies, acts and rules**

Environmental Conservation Act 1995 (ECA-95) provides for conservation of the environment, improvement of environmental standards and control and mitigation of environmental pollution. Environmental Conservation Rules 1997 (ECR-97) lays down the process for obtaining clearances, includes forms for obtaining clearance certificates and standards for pollution control. Environmental Impact Assessment (EIA) in Bangladesh has compliance with Environmental Policy 1992, Environmental Conservation Act 1995 (ECA-95) and the Environmental Conservation Rules 1997 (ECR-97). Department of Environment (DoE) regulates the enforcement of ECA-95 and ECR-97.

The Department of Environment (DoE), under the Ministry of Environment and Forests (MoEF) has formulated a Bangladesh Climate Change Strategy and Action Plan (BCCSAP) in 2009. The MoEF has drafted the Environmental Critical Areas Rules, 2010 under the ECA-95. Noise Pollution Rules, 2006 and Medical Waste Management Rules have been formulated under the ECA-95.

## **B-2 Social regulatory framework in Bangladesh**

Social regulatory frameworks in Bangladesh regarding social safeguards are aligned with several legislative enactments and their amendments designed over the decades. Social safeguard regarding the indigenous communities and land acquisition is discussed below:

Indigenous communities/ethnic minority communities: the Constitution of Bangladesh has no specific declaration for the cultural and ethnic minorities in Bangladesh. The Article 28 (4) which states that: Nothing shall prevent the state from making special provision in favors of women and children or for the advancement of any backward section of the citizens. This article 28 (4) is often referred while discussing social protection for ethnic minorities even though this provision does not clearly define "backward". Considering the need of special provisions for people of tribal communities, a special programme was initiated in 1996-97 by the Prime Minister's Secretariat.

The National Parliament of Bangladesh passed the Peace Accord 1997 as the "Chittagong Hill Tracts (CHT) Regional Council Act, 1998 (Act 12 of 1998). The Accord recognised the ethnic people's right to land, culture, language, and religion as a part of establishing peace. The Accord declares detailed provisions for the system of self-governance in the CHT and addressing the land-related problems. A ministry on CHT Affairs was hence established which has a minister from the indigenous people of hill districts. The ministry is assisted by an Advisory Council from the CHT region. Moreover, the Poverty Reduction Strategic Paper (PRSP) 2005 includes strategic

suggestions to preserve the cultural, social and economic identity and interests of the ethnic/indigenous populations in and outside CHT.

### **Land acquisition**

In Bangladesh, The Ministry of Land (MOL) is authorised to deal with land acquisition. The MOL delegates some of its authority to the Commissioner at Divisional level and to the Deputy Commissioner at the district level. The Deputy Commissioners (DCs) are empowered by the MOL to process land acquisition under the Ordinance and pay compensation to the legal owners of the acquired property.

Land acquisition for infrastructure projects/programmes is governed by the Acquisition and Requisition of Immovable Property Ordinance II (1982) amended as of 1994 which supersedes earlier laws such as Land Acquisition Law of 1894 and others. More to that, acquisition of any land or forest area, in Chittagong Hill-Tracts (CHT) districts require consent under the Chittagong Hill-Tracts (Land Acquisition) Regulation (1958), the CHT Regional Council Act 1998 and the Forest Act (1927).

The Acquisition and Requisition of Immovable Property Ordinance II (1982) is the fundamental tool for governing land acquisition in Bangladesh. It is restricted to “legal” owners of property as supported by records of ownership to compensate for land as well as any business, structure, trees and crops on the land. Under the Ordinance, the DC is entrusted to acquire land for any public infrastructure project. The requiring body, after getting approval of the administrative ministry, requests DC to undertake acquisition of the required land as per its proposal.

The Government has drafted a national policy on involuntary resettlement and rehabilitation in 2008, which is aligned with the general policy of the Government that the rights of those displaced by development projects/programmes, river erosion and slum eviction shall be fully respected, and that those displaced shall be treated with dignity and assisted to safeguards their welfare and livelihoods irrespective of title, gender, and ethnicity.

### **B-3 Bangladesh Bank’s Environmental Risk Management (ERM), February 2015**

The Bangladesh Bank (BB) has prepared Environmental Risk Management (ERM) guidelines for banks and financial institutions in January 2011. It recognises the credit risks resulting from environmental risks and hence has a risk-based approach to analyse environmental risk when assessing financing opportunities.

Banks and financial institutions (FIs) need to understand local environment and social regulatory frameworks and international treaties on various aspects and impacts to assess levels of compliance. Hence, BB recommends that all Banks and FIs should

pass a Resolution of the Board or appropriate top and senior management committee on the adoption of these guidelines and acceptance of related principles. On an annual basis, all banks/FIs should undertake a top management review to determine whether ERM is being effectively practiced in its operations.

According to the ERM of BB, banks or FIs should maintain a database of all investments made by the bank in terms of the sector, risk category, E&S issues, financing conditions or covenants, current status and future recommendations. A bank or FI has to carry out research on E&S good practices, regulations and standards and mitigation measures (including specific technologies for abatement, treatment and monitoring of pollution, recycle and reuse of waste, etc) for diverse industry sectors. The bank or FI should focus on the sectors that are prominent in its portfolio. For example, if a bank or FI has invested majorly in tanneries, the research work should focus on issues pertinent to the tannery sector such as clustering of tanneries outside the urban area, design of common effluent treatment plants, treatment and reuse of chromium waste, etc. The bank or FI should also advise the borrowers on designing the E&S policy, implementing international management systems on environment, occupational health and safety such as ISO 14001, OHSAS 18001. The bank or FI should prepare approach papers on issues like technology innovation in an industry sector, potential policy or regulatory changes to integrate E&S issues, etc and submit it to Bangladesh Bank with a forwarding note to take the issue up with respective government departments.

#### **B-4 ADB's Environmental and Social Safeguard Policy Statement, 2009**

ADB's safeguard policy aims to help developing member countries (DMCs) address environmental and social risks in development projects/programmes and minimise and mitigate, if not avoid, adverse project impacts on people and the environment. Approved by ADB's Board of Directors in July 2009, the Safeguard Policy Statement (SPS) builds upon the three previous safeguard policies on the environment, involuntary resettlement, and indigenous people, and brings them into a consolidated policy framework that enhances effectiveness and relevance. The SPS applies to all ADB-supported projects/programmes reviewed by ADB's management after 20 January 2010. ADB works with borrowers to put policy principles and requirements into practice through project review and supervision, and capacity development support. The SPS also provides a platform for participation by affected people and other stakeholders in project design and implementation.

#### **Environmental safeguards**

Proposed projects/programmes are screened according to type, location, scale, and sensitivity and the magnitude of their potential environmental impacts, including direct, indirect, induced, and cumulative impacts. Projects/programmes are classified into the following four categories:

Category A: A proposed project is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An environmental impact assessment (EIA), including an environmental management plan (EMP), is required.

Category B: **The proposed project's potential adverse environmental impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A** projects/programmes. An initial environmental examination (IEE), including an EMP, is required.

Category C: A proposed project is likely to have minimal or no adverse environmental impacts. An EIA or IEE is not required, although environmental implications need to be reviewed.

Category D: A proposed project involves the investment of ADB funds to or through a financial intermediary. The financial intermediary must apply and maintain an environmental and social management system, unless all of the financial intermediary's business activities have minimal or no environmental impacts or risks.

## **Social safeguards**

### **Involuntary resettlement:**

The involuntary resettlement impacts of an ADB-supported project are considered significant if 200 or more persons will be physically displaced from home or lose 10% or more of their productive or income-generating assets. For those involving involuntary resettlement, a resettlement plan is prepared that is commensurate with the extent and degree of the impacts: the scope of physical and economic displacement and the vulnerability of the affected persons. Projects/programmes are classified into the following four categories:

Category A: A proposed project is likely to have significant involuntary resettlement impacts. A resettlement plan, which includes assessment of social impacts, is required.

Category B: A proposed project includes involuntary resettlement impacts that are not deemed significant. A resettlement plan, which includes assessment of social impacts, is required.

Category C: A proposed project has no involuntary resettlement impacts. No further action is required.

Category D: A proposed project involves the investment of ADB funds to or through a financial intermediary. The financial intermediary must apply and maintain an

environmental and social management system, unless all of the financial intermediary's business activities are unlikely to generate involuntary impacts.

### **Indigenous people:**

The impacts of an ADB-supported project on indigenous people are determined by assessing the magnitude of impact in terms of:

- Customary rights of use and access to land and natural resources;
- Socioeconomic status;
- Cultural and communal integrity;
- Health, education, livelihood, and social security status;
- The recognition of indigenous knowledge; and
- The level of vulnerability of the affected indigenous people community.

Projects/programmes are classified into the following four categories:

Category A: A proposed project is likely to have significant impacts on indigenous peoples. An indigenous peoples plan (IPP), including assessment of social impacts, is required.

Category B: A proposed project is likely to have limited impacts on indigenous peoples. An IPP, including assessment of social impacts, is required.

Category C: A proposed project is not expected to have impacts on indigenous peoples. No further action is required.

Category D: A proposed project involves the investment of ADB funds to or through a financial intermediary. The financial intermediary must apply and maintain an environmental and social management system, unless all of the financial intermediary's business activities unlikely to have impacts on indigenous peoples.

# ANNEX C

## BRAC COMPLIANCE

Established in 1972, BRAC is a development organisation dedicated to alleviating poverty by empowering the poor. It is the largest non-government development organisation in the world, measured by the number of employees (115,000) and population coverage (138 million). BRAC has its permanent office set up in each of the 64 administrative districts and has access to reach the remotest geographical areas and communities. BRAC has been successfully implementing development programmes in different parts of the country and 11 different countries across the globe. BRAC programmes are diverse, impactful that range from wellbeing and resilience to economic development, social protection and empowerment. BRAC programmes include Microfinance; Health Nutrition and Population; Education; Disaster Management and Climate Change (DMCC); Water Sanitation and Hygiene (WASH); Agriculture and Food Security (AFS), Community Empowerment, Human Rights and Legal Aid Services, and Urban Development among others. As a part of implementing strategy, BRAC associates with local organisations working at the community level, and also works with different local level government and non-government entities towards implementing its different programme activities. Since the establishment of the organisation, BRAC has been involved with hundreds of development partners, received substantial amounts of grants, explored and adopted required technical assistance and successfully worked together to do 'better' for the communities.

BRAC believes that sustainable development requires all three aspects of economic, social and environmental to be integral. As a non-government organisation, BRAC has been implementing development projects with very low or no social and environmental risks. Though BRAC has always been implementing very low or no risk development projects, it has always taken care that the social and environmental issues receive topmost priority during implementation of projects. BRAC's track record with development partners is built on mutual trust, transparent financial dealings and utmost accountability towards its stakeholders. The organisational track history shows that BRAC signed agreements with donors and complied with all relevant policies and procedures of the donors, as well as the policies and regulations of the national government where the projects are being implemented, particularly to do with the country priorities and environmental and social safeguard issues of Bangladesh. BRAC is a learning organisation that has developed with learned experiences over the years. BRAC has got an excellent track record to learn from past experiences and take initiatives to make projects more stakeholder-friendly. Technical people are working with BRAC but even after that if advanced level knowledge is required, BRAC is flexible to take technical assistance from the donor community, hire short term consultants, and work on staff development.

## Partnerships as priority in BRAC

Partnerships are a recurring theme in the current dialogue on aid effectiveness. The word received its due importance in the agreed Sustainable Development Goals (SDGs), launched at the UN Summit in September 2015. The SDG Goal 17: *Partnership for the Goals* aims to advance “multi-stakeholder partnerships that mobilise and share knowledge, expertise, technologies and financial resources,” while promoting “effective public, public-private, and civil society partnerships, building on the experience and resourcing of partnerships. BRAC, over its long years of work experience in the field of development has collaborated and entered into partnerships with different national and international organisations and development partners to implement numerous programmes and projects.

BRAC’s admirable compliance history won the trust of its development partners that helped to establish strategic partnerships, which is a long-term commitment to grow mutually and ‘do good’ for the society.

## BRAC Partners

**Government Alliances:** BRAC has a long history of working in collaboration with the Government of Bangladesh. Our joint efforts have significantly contributed to attaining several of the Millennium Development Goals (MDGs) and we are looking forward to meeting the Sustainable Development Goals. The following are the names of some of the ministries and government units that we have been closely working with:

- Ministry of Cultural Affairs
- Ministry of Education
- Ministry of Fisheries & Livestock
- Ministry of Food and Agriculture
- Ministry of Health and Family Welfare
- Ministry of Primary and Mass Education
- Ministry of Social Welfare
- Ministry of Foreign Affairs
- Directors General of Health Services
- Department of Agricultural Extension
- Ministry of Women and Children Affairs
- Ministry of Youth and Sports
- National Institute for Local Government
- Tongi Paurashava
- All-Party Parliamentary Group

- Bureau of Manpower Employment and Training
- Ministry of Expatriate Welfare and Overseas Employment
- Bangladesh Overseas Employment and Services Limited
- Bureau of Manpower, Employment and Training

**BRAC's Strategic Partnership Arrangement (SPA) and compliance:** BRAC is in strategic partnership with UK's Department for International Development (DfID) and Australia's Department of Foreign Affairs and Trade (DFAT), in which case we are working together to bring positive changes in the lives of people. The Strategic Partnership Arrangement (SPA) is a unique partnership between BRAC, the UK Government and the Australian Government that is based on shared goals, clear results and mutual accountability. The core funding provided through the Strategic Partnership Arrangement (SPA) supports BRAC to deliver tangible results for the people living in poverty in Bangladesh, while at the same time developing plans to reduce its reliance on external donor funds; to continue to strengthen its internal systems; and to seek ways to work more closely with the Government of Bangladesh (GoB). The Strategic Partnership Arrangement supported the BRAC Strategy 2011–15 and supports the current BRAC Strategy 2016-20. Within this agreed strategic framework, BRAC, as the implementing partner, would retain control over how to allocate the funds and take the lead in delivering partnership outputs. The arrangement focuses on outcomes rather than activities.

BRAC and the SPA complies with the *Environment Protection Policy for the Aid Program* (<https://dfat.gov.au/about-us/publications/Documents/environment-protection-policy-aid-program.pdf>), Environmental and Social Safeguards of DFID ([http://r4d.dfid.gov.uk/pdf/outputs/EoD/EoD\\_HDYr3\\_12\\_Dec2014\\_Clim\\_Env\\_Safeguards.pdf](http://r4d.dfid.gov.uk/pdf/outputs/EoD/EoD_HDYr3_12_Dec2014_Clim_Env_Safeguards.pdf)) and relevant policies mentioned in the agreements signed among DFID, DFAT and BRAC.

The list of donors of BRAC includes diversified and effective changemakers who have been working with BRAC from the day of its inception. Major institutional donors include: European Union, Kingdom of the Netherlands, The Global Fund, EACI Qatar, UNICEF, and Bill & Melinda Gates Foundation.

**List of donors/institutions that works or has worked with BRAC and the funded projects**

<b>Letter</b>	<b>Name of donor</b>
<b>A</b>	AusAID, Australian High Commission, AKF, AKF/CIDA, AVRDC, Adam Smith International, AED /ARTS, AIDA, Americares Foundation, Apasen International, Asian Disaster Preparedness Centre
<b>B</b>	British Red Cross, British Council, Bill and Melinda Gates Foundation, Barmingham Young University, BencomS.r.l., BRAC UK, BRAC University, BRAC USA, Bread for the World, British Executive Service
<b>C</b>	Christian Aid, CIDA, CAF-America, Campaign for Popular Education, Care-Bangladesh, Center for Development Research, Centre for Development, CESVI, CfBT Education Trust, Charity Water, Chevron Bangladesh, CIFF, CIMMYT-India, Columbia University USA, Commonwealth Foundation, Community Aid Abroad, Community Aid fread Australia, Conrad N. Hilton Foundation, Corolla Corporation Ltd.
<b>D</b>	DFID, DANIDA, DIMAGI, Dr. Theodore H. Thomas
<b>E</b>	EACI-QATAR, EC, EDGE Consulting Ltd., EKN, Embassy of Japan, Emory University, Engender Health, Euroconsult Mott Mac Donald, EZE
<b>F</b>	Ford Foundation, Foundation Open Society Institute, F.R.C. Calcutta, Family Health International, Fidelis, France, FRANCH
<b>G</b>	GAIN, German Embassy, GITAC Consult GmbH, GIZ, Global Development Network Inc. (GDN), GOB, GSMA Mobile for Dev. Foundation
<b>H</b>	Hospital for sick children
<b>I</b>	IRRI, IUCN, ICDDRDB, ICLARM, ILO, Imp – Act, Imperial College, Indepth Network, Institute of Dev. Studies-Sussex, Institute of Development Agencies, Inter Co-operation Bangladesh, International Committee Red Cross, International Committee of the Red Cross, International Food Policy Research Institute, International Inst. Of Social Studies, International Potato Centre, International Research and Exchange, Inter pares, Ircon International Ltd.
<b>J</b>	Japan Embassy, Joipur Limb Centre
<b>K</b>	KFW, Karolinska University-Sweden, KATALYST
<b>L</b>	Land O Lakes, Liverpool School of Tropical Medicine, London School of Hygiene & Tropical Medicine, Luftfahrt ohne Grenzen e. V.
<b>M</b>	Mercy Corps, USA, MacKay's Stores Ltd., Manusher Jonno Foundation, MCC, MDF Training & Consultancy, Micro-Nutrient Initiative, Monash University
<b>N</b>	NIKE Foundation, NORAD, NOVIB, NCOS, NCVK, Nicare Bangladesh,
<b>O</b>	OXFAM America, OXFAM (U.K.), OXFAM (CANADA), OXFAM (OXFORD), Oxford University, Orbis International, ODI, Overseas Book Centre Canada

<b>P</b>	Pathfinder International, Plan Bangladesh, Plan International, Population Council, Porticus, Poster Partners
<b>Q</b>	Nil
<b>R</b>	Rockefeller Foundation, Rotary International, Royal Tropical Institute
<b>S</b>	Save the Children, SIDA, Safer World, Sight savers, Swiss Caritas, Save East Bangal, Scojo Foundation Incorporation, SDC, SID, SimPrints, Social Marketing Company, Splash International, Standford University
<b>T</b>	The Global Fund, The British Council, The Burnland Trust, The Johanniter, The Rotary Foundation, The University of British Columbia, The University of Manchester, The What to Expect Foundation, TRL Ltd.,
<b>U</b>	UNDP, UNESCO, UNFPA, UNHCR, UNICEF, UN Women, UNCDF, UNDEF, ULG Northumbria, UNICOL BD Ltd., Unilever-UK, United Town Organisation, United Way International, University of Aberdeen, University of Bonn, University of Calgary, Canada, University of Leeds, University Research Company LLC., University Research Corporation LLC., Upsala University, USCC
<b>V</b>	Vision Spring
<b>W</b>	WFP, WHO, World Bank, Winrock International-USA, Women Win, World Fish, World Hunger

### Major projects implemented during the period of 2005-2015

SI No	Name of project	Year of implementation	Donor	Amount	
				BDT	USD
1	BRAC Splash Wash in School	2015	Splash International	4,565,307	186,735
2	BRAC Urban Slum School	2015	EACI-QATAR	61,249,544	785,251
3	BRAC Water, Sanitation and Hygiene Programme (WASH-II)	2015	EKN	123,712,564	1,586,059
4	Char Development and Settlement Programme	2015	Euroconsult Mott Mac Donald	20,504,303	262,876
5	Community Water Management for Improved Food Security	2015	IRRI	3,088,000	39,590
6	Economic Empowerment for Poor and Vulnerable Women	2015	EC	17,115,834	219,434
7	Increase Access to Improved Water Sanitation and Hygiene	2015	Charity Water	48,167,433	617,531
8	Malaria Control Programme	2015	The Global Fund	263,878,601	3,383,059
9	Strategic Partnership Arrangement (SPA)	2015	DFID	3,008,070,416	38,565,005
10	Strategic Partnership Arrangement (SPA)	2015	DFAT	1,756,125,832	22,514,434
11	Sustainable Human Dev and Empowerment of Vulnerable Women	2015	UN Women	29,509,400	378,326
12	TB Control Programme	2015	The Global Fund	1,022,178,767	13,104,856
13	Technology Adoption and Food Security in Rural Bangladesh	2014	Monash University	2,157,413	27,659
14	TB Control Programme	2014	The Global Fund	1,324,900,970	16,985,910

SI No	Name of project	Year of implementation	Donor	Amount	
				BDT	USD
15	Sustainable Human Development and Empowerment of Women	2014	UN Women	53,826,784	690,087
16	Strategic Partnership Arrangement (SPA)	2014	DFID	6,946,250,000	89,054,487
17	Strategic Partnership Arrangement (SPA)	2014	AusAID	3,623,697,700	46,457,663
18	Productive, profitable and resilient agriculture and aquaculture systems	2014	IRRI	1,048,778	13,446
19	Malaria Control Programme	2014	The Global Fund	323,366,404	4,145,723
20	Increasing Access to Improved Water, Sanitation and Hygiene	2014	Charity Water	45,216,605	579,700
21	Char Development and Settlement Programme	2014	Euroconsult Mott Mac Donald	21,537,191	276,118
22	BRAC Water, Sanitation and Hygiene Programme (WASH-II)	2014	EKN	686,460,168	8,800,771
23	BRAC Boat School	2014	EACI-QATAR	112,915,025	1,447,629
24	TB Control Programme	2013	The Global Fund	1,292,989,200	16,576,785
25	Sustainable Human Development and Empowerment of Vulnerable Women	2013	UN Women	36,830,400	472,185
26	Strategic Partnership Arrangement (SPA)	2013	AusAID	3,399,871,550	43,588,097
27	Strategic Partnership Arrangement (SPA)	2013	DFID	7,866,150,000	100,848,077
28	Productive, profitable and resilient agriculture and aquaculture systems	2013	IRRI	1,139,197	14,605
29	Malaria Control Programme	2013	The Global Fund	302,062,227	3,872,593

SI No	Name of project	Year of implementation	Donor	Amount	
				BDT	USD
30	Developing BRAC's Emergency Response Capacity	2013	BRAC USA	25,306,523	324,443
31	Char Development and Settlement Programme	2013	Euroconsult Mott Mac Donald	21,463,402	275,172
32	BRAC Water, Sanitation and Hygiene Programme	2013	EKN	821,070,923	10,526,550
33	TB Control Programme	2012	The Global Fund	885,684,836	11,354,934
34	Sustainable Human Development and Empowerment of Vulnerable Women	2012	UN Women	10,747,310	137,786
35	Strategic Partnership Arrangement (SPA)	2012	AusAID	4,264,942,700	54,678,753
36	Strategic Partnership Arrangement (SPA)	2012	DFID	6,387,884,049	81,895,949
37	Support to Agriculture Research for Climate Change	2012	IRRI	1,198,500	15,365
38	Malaria Control Programme	2012	The Global Fund	244,479,408	3,134,351
39	Crop Intensification for Achieving Food Self-Sufficiency Programme	2012	EC	69,882,596	895,931
40	BRAC Water, Sanitation and Hygiene Programme	2012	EKN	748,196,612	9,592,264
41	Support to Agriculture Research for Climate Change	2011	IRRI	1,051,500	15,021
42	Strategic Partnership Arrangement (SPA)	2011	DFID	3,335,205,500	47,645,793
43	Malaria Control Programme	2011	The Global Fund	214,164,501	3,059,493

SI No	Name of project	Year of implementation	Donor	Amount	
				BDT	USD
44	Restoring Socio-Economic Stability and Strengthening affected by AILA	2011	EC	357,006,398	5,100,091
45	Malaria Control Programme	2011	The Global Fund	214,164,501	3,059,493
46	Restoring Socio-Economic Stability and Strengthening affected by AILA	2011	EC	357,006,398	5,100,091
47	Crop Intensification for Achieving Food Self-Sufficiency Programme	2011	EC	178,146,114	2,544,944
48	Char Development and Settlement Programme	2011	EKN	3,123,282	44,618
49	Char Development and Settlement Programme	2011	Euroconsult Mott Mac Donald	3,068,434	43,835
50	TB Control Programme	2010	The Global Fund	757,939,115	10,984,625
51	Social and Financial Empowerment of Adolescents (SOFEA)	2010	BRAC USA	54,106,056	784,146
52	Post SIDA Livelihood Rehabilitation Programme	2010	EC	84,107,199	1,218,945
53	Malaria Control Programme	2010	The Global Fund	205,638,005	2,980,261
54	Disaster Resilient Habitat: An Alternative to Cyclone Shelter	2010	UNDP	10,309,500	149,413
55	Crop Intensification for Achieving Food Self-Sufficiency Programme	2010	EC	240,520,031	3,485,798
56	BRAC Water, Sanitation and Hygiene Programme	2010	EKN	1,495,938,740	21,680,272

SI No	Name of project	Year of implementation	Donor	Amount	
				BDT	USD
57	Social and Financial Empowerment of Adolescents (SOFEA)	2009	BRAC USA	45,894,576	669,994
58	Post SIDR Livelihood Rehabilitation Programme	2009	EC	760,480,404	11,101,904
59	Malaria Control Programme	2009	The Global Fund	241,709,864	3,528,611
60	TB Control Programme	2009	The Global Fund	608,640,779	8,885,267
61	Cyclone Relief and Rehabilitation Activities	2009	BRAC USA	899,532	13,132
62	Cyclone Relief and Rehabilitation Activities	2009	Local contribution	393,230	5,741
63	Cyclone Relief and Rehabilitation Activities	2009	NOVIB	34,777,005	507,694
64	Cyclone SIDR Emergency Health & Nutrition Response in Bangladesh	2009	Save the Children	2,090,841	30,523
65	Char Development and Settlement Programme	2009	EKN	29,543,496	431,292
66	BRAC Water, Sanitation and Hygiene Programme	2009	EKN	1,186,352,302	17,319,012
67	AILA Relief & Rehabilitation	2009	BRAC USA	22,039,824	321,749
68	AILA Relief & Rehabilitation	2009	LuffahrtohneGrenzen e. V.	46,779,303	682,910
69	TB Control Programme	2008	The Global Fund	425,191,291	6,229,909
70	Malaria Control Programme	2008	The Global Fund	181,329,195	2,656,838
71	Char Development and Settlement Programme	2008	EKN	28,316,340	414,891

SI No	Name of project	Year of implementation	Donor	Amount	
				BDT	USD
72	BRAC Water, Sanitation and Hygiene Programme	2008	EKN	829,597,069	12,155,268
73	TB Control Programme	2007	The Global Fund	460,097,085	6,766,134
74	Malaria Control Programme	2007	The Global Fund	211,873,269	3,115,783
75	Dissemination of Small Solar Home System	2007	GTZ	4,136,578	60,832
76	Cyclone Relief and Rehabilitation Activities	2007	NOVIB	59,523,990	875,353
77	Char Development and Settlement Programme	2007	EKN	23,220,507	341,478
78	BRAC Water, Sanitation and Hygiene Programme	2007	EKN	462,260,295	6,797,946
79	TB Control Programme	2006	The Global Fund	534,392,964	7,858,720
80	Community Based Fisheries Management Project	2006	ICLARM	7,246,243	106,562
81	Char Development and Settlement Programme	2006	EKN	25,981,634	382,083
82	BRAC Water, Sanitation and Hygiene Programme	2006	EKN	204,563,630	3,008,289
83	TB Control Programme	2005	The Global Fund	288,696,347	4,441,482
84	HIV/AIDS Prevention Project	2005	UNICEF	11,140,313	171,389
85	Community Based Fisheries Management Project	2005	ICLARM	6,258,689	96,288
86	Char Development and Settlement Programme	2005	EKN	13,121,438	201,868

As mentioned before, BRAC has been working in collaboration and partnership with the Government of Bangladesh (GoB). There are a number of projects that has been designed by the GoB that has been implemented by BRAC. As the projects were designed by GoB, the relevant social and environmental screening and required measures (if required) were taken by the relevant programmes. For example, the malaria control programme, the TB control programme, BCUP, the char development and settlement programme.

#### List of relevant projects with compliance clue (project wise)

SI No	Name of project	Name of donor	Year of implementation	Amount	
				BDT	USD
1	Accelerating Water, Sanitation & Hygiene (WASH)	UNICEF	2011-12	10,458,985	143,248
2	Agroforestry and Block Plantation	EC	1997-2000	78,596,718	1,709,866
3	Aquatic Agricultural System (AAS)	World Fish	2013-15	1,953,356	25,043
4	Alternative Livelihood Project	ULG Northumbria	2004-5	18,524,076	305,557
5	AILA Relief & Rehabilitation	BRAC USA and Luftfahrt ohne Grenzen e. V.	2009	68,819,127	1,004,659
6	Atta Fortification Programme	World Food Programme	2001-2011	313,671,372	4,652,405
7	Arsenic Mitigation	UNICEF, Rotary International	1999-2006	77,662,813	1,351,979
8	BRAC Cold Storage	UNCDF	1981-84	28,641,035	1,263,964
9	BRAC Dairy & Food Project	DANIDA	1997	48,749,159	1,133,701
10	BRAC Water, Sanitation and Hygiene Programme	EKN	2006-2013	6,956,926,051	98,350,265

SI No	Name of project	Name of donor	Year of implementation	Amount	
				BDT	USD
11	BRAC Water, Sanitation and Hygiene Programme (WASH-II)	EKN	2014-2015	810,172,732	10,386,830
12	BRAC Splash Wash in School	Splash International	2015	14,565,307	186,735
13	BRAC Boat School	EACI-QATAR	2013-15	218,667,245	2,803,426
14	Char Development and Settlement Programme	EKN and Euroconsult Mott Mac Donald	2000-2015	257,540,785	3,766,040
15	Community Based Fisheries Management Project	ICLARM	2002-2007	32,147,416	521,645
16	Community Water Management for Improved Food Security	IRRI	2015	3,088,000	39,590
17	Crop Intensification for Achieving Food Self-Sufficiency Programme	EC	2010-2012	488,548,741	6,926,673
18	Cyclone Shelter	British Red Cross	1993-94	10,815,744	288,828
19	Cyclone SIDR Emergency Health & Nutrition Response in Bangladesh	Save the Children	2008-2009	31,790,838	465,688
20	Cyclone Relief and Rehabilitation Activities	AusAID, Australian High Commission, BRAC USA, Conrad N. Hilton Foundation, DFID, Ford Foundation, Local contribution, NIKE Foundation, NOVIB, The Johanniter, WFP	2007-2009	865,562,224	12,685,518

SI No	Name of project	Name of donor	Year of implementation	Amount	
				BDT	USD
21	Disaster Resilient Habitat: An Alternative to Cyclone Shelter	UNDP	2010	10,309,500	149,413
22	Dissemination of Small Solar Home System	GTZ	2007	4,136,578	60,832
23	Early Recovery Facility of UNDP Bangladesh	BRAC USA, UNDP	2013-2015	4,755,042	60,962
24	Forth Fisheries Project	ULG Northumbria, DFID	2000-2006	52,492,042	885,908
25	Fisheries Management and Development Programme	Ford Foundation	1997	7,215,813	167,810
26	Haor Development Programme	SIDA	1990-92	18,526,357	550,057
27	Housing for the Rural Poor	NOVIB	1987, 1988, 1990	12,996,856	413,269
28	Increasing Access to Improved Water Sanitation and Hygiene	Charity Water	2014-2015	93,384,038	1,197,231
29	Jamalpur Woman Programme	OXFAM America	1976-1987	5,256,237	224,226
30	Malaria Control Programme	The Global Fund	2007-15	2,188,501,474	29,876,713
31	Mirpur Urban Resettlement Programme	OXFAM (UK), World Hunger	1978-1979	724,858	48,324
32	Northwest Crop Diversification Project	GoB	2002-09	62,627,046	952,187
33	Post Cyclone Rehabilitation and Development	NOVIB, Oxfam America, EZE, Ford Foundation, NORAD, SIDA and others	1991-1994	134,770,913	3,856,189
34	Post SIDR Livelihood Rehabilitation Programme	EC	2008-2011	1,179,408,559	17,229,120
35	Poultry for Nutrition Project	GoB	1998-2006	94,410,665	1,598,238

SI No	Name of project	Name of donor	Year of implementation	Amount	
				BDT	USD
36	Productive, profitable and resilient agriculture and aquaculture systems	IRRI	2012-14	3,399,661	43,585
37	Relief and Rehabilitation Programme	AusAID, DFID, CESVI, CIDA, DANIDA, EC, EKN, EZE, Ford F, German Embassy, MacKay's Stores Ltd., MCC, Mercy Corps, USA, NCOS, NCVK, NORAD, NOVIB, Local Contributions, Others, Oxfam America, Oxfam UK, Plan BD, Plan Int., SDC, SID, UNDP, UNICEF, United Way Int.	1979, 1980s, 1990s and 2000s	948,638,474	19,560,087
38	Rural Development Programme	SIDA, NOVIB, NORAD, Ford Foundation, EZE, EKN, EC, DIFID, DANIDA, AKF/CIDA	1986-2000	5,957,538,783	152,547,488
39	Restoring Socio-Economic Stability and Strengthening Affected by ALLA	2010-2012	EC	497,714,303	7,051,333
40	Strategic Partnership Arrangement (SPA)	AusAID, DFID	2011-2015	40,588,197,747	525,248,258
41	Sundarban Biodiversity Conservation Project	GoB	2001-2004	8,428,076	146,920

SI No	Name of project	Name of donor	Year of implementation	Amount	
				BDT	USD
42	Sustainable Human Development and Empowerment of Vulnerable Women through Viable Livelihood Options	UN Women	2012-2015	130,913,894	1,678,383
43	Support to Agriculture Research for Climate Change	IRRI	2011-2013	2,562,200	34,389
44	Technology assessment and farm household segment	Centre for Development	2012-2014	7,537,680	96,637
45	Technology Dissemination of Aquaculture for Poverty Reduction	AIDA	2010-2011	21,979,275	316,821
46	Technology Adoption and diffusion the system of Rice	Monash University	2015	2,200,624	28,213
47	Technology Adoption and Food Security in Rural Bangladesh	Monash University	2014-2015	6,074,391	77,877

## ANNEX D

# DOCUMENTS RELATED TO ESIA

## ANNEX D-1: SITE VISIT CHECKLIST – ENVIRONMENTAL SAFEGUARDS

(applicable for 'high risk' rated projects/programmes specially and for 'moderate risk' rated projects/programmes, if need be)

### A. Greenfield projects

A reconnaissance visit should be conducted to observe the:

1. Current land use of project site
2. Land use of adjoining areas
3. Topography of the site & average levels of the site
4. Traces of pollution (land, air, water)

An interview should be organised with the local authority to identify significant issues related to the project site as listed below:

5. Distance from designated protected areas/ national parks/ wildlife sanctuaries
6. Distance from designated ecologically critical areas (as declared by DoE)
7. Whether the site/adjoining properties has any history of industrial pollution? Any action has been initiated against the present/past land owner due to the pollution?
8. Is the site located near any river/stream/perennial nala? Do the local people located downstream from the site depend on this for their domestic & agricultural water needs?
9. Do local fishermen use this stream/river for their livelihood?
10. Is the site prone to flooding? Has there been any major flooding in the last 10 years?
11. Will the construction of the project change the natural drainage pattern of the site and affect any river/stream/perennial nala?
12. Any chances of major severance (approach road, water body, access road to farm lands, school, healthcare, mosque, etc)
13. Does the site have any major trees? Approximately how many of these are to be cut due to project?
14. Is the area known for having rare/endangered/ migratory species?
15. Is the site & surrounding area known for having unique fragile ecosystem?
16. Whether there are any structures of cultural/historical/religious importance near the site or any designated archaeological sites/ remnants?
17. The main economic activities in the nearby town/city/villages that may be altered by the construction and /or the operation of the project?
18. Whether there are any tourist attractions near the site, which may be affected due to this project?

## **B. Brownfield projects**

The checklist of questions for Greenfield projects shall also be applicable for Brownfield projects. In additions the questions listed below shall also be applicable.

19. Numbers & types of structures at site (detailed description & possible age of structure)
20. Adjacent land use and structures on them
21. What was the previous land use? If industrial land use, what was the type of industry? What was being manufactured?
22. Does the present land use involve hazardous waste generation & storage and/or use of petroleum products (barring any natural gas)?
23. Does the past land use involve hazardous waste generation & storage and/or use of petroleum products (barring any natural gas)?
24. Source of utilities to site (gas, electricity, water supply and sewage)?
25. Are there any pits/ponds/lagoons in the existing structure?
26. Are there any storage tanks (above and/or underground) in the property? If yes, please note the details of their capacity, content and age.
27. Are there any visible stains, marks or corrosions (of spillage) in the existing structure or on the ground/soil/pavement?
28. Are vegetation in and/or near the project appear to be stressed (discoloration and/or necrosis of leaves, droopiness of the structure or death of plant)?
29. Presence of apparently filled/graded with non-natural material or solid waste
30. Is there any presence of friable asbestos?
31. Is there any presence of lead-based paints?
32. Are there any transformer oil stored within the site that contains Poly-Chlorinated Biphenyls (PCB)?
33. Presence of any of the following within or in the close vicinity of the site:
  - a. Borewell
  - b. Injection well/recharge well
  - c. Septic tank
  - d. Sewers/drains/sumps
  - e. Effluent Treatment Plant (ETP)

## **ANNEX D- 2: PRELIMINARY ENVIRONMENTAL APPRAISAL REPORT**

1. Date
2. Project ID and title:
3. Project categorisation as per BRAC's ESSF:

4. Project description (location, components, cost):
5. Application of GOB environmental regulations/permits required, if any
6. Status of clearances and permits:
  - ▶ Location Clearance Certificate
  - ▶ ToR for EIA
  - ▶ Environmental Clearance Certificate
7. Environmental Implications (Summary of sector specific checklist, permits required under GOB regulations)
8. Positive impacts:
9. Recommended E&S covenants by panel:
10. Attach filled in formats listed below:
  - ▶ E&S Risk Rating checklist
  - ▶ Sector specific checklist for the project

## ANNEX D- 3: GUIDELINES FOR CONTENTS OF IEE

### **I. Outline of an IEE Report**

#### **A. Introduction**

This section usually includes the following:

purpose of the report, including (a) identification of the project and project proponent; (b) brief description of the nature, size, and location of the project and of its importance to the country; and (c) any other pertinent background information; and

Extent of the IEE study: scope of study, magnitude of effort, person or agency performing the study, and acknowledgement.

#### **B. Description of the project**

Furnish sufficient details to give a brief but clear picture of the following (include only applicable items):

- type of project; category of project;
- Need for project;
- location (use maps showing general location, specific location, and project site); (iv)
- Size or magnitude of operation;
- Proposed schedule for implementation; and
- Descriptions of the project, including drawings showing project layout, and project

components. This information should be of the same type and extent as is included in feasibility reports for proposed projects to give a clear picture of the project and its operations.

### **C. Description of the environment**

Furnish sufficient information to give a brief but clear picture of the existing environmental resources in the area affected by the project, including the following (to the extent applicable):

- (i) Physical resources: atmosphere (eg, air quality and climate); topography and soils; surface water; groundwater; geology/seismology
- (ii) Ecological resources: fisheries; aquatic biology; wildlife; forests; rare or endangered species; protected area; coastal resources.
- (iii) Economic development: (eg) industries; infrastructure facilities (e.g. water supply, sewerage, flood control); transportation (roads, harbors, airports, and navigation); land use (eg, dedicated area uses); power sources and transmission; agricultural development, mineral development, and tourism facilities
- (iv) Social and cultural resources: (eg) population and communities (eg, numbers, locations, composition, employment); health facilities; education facilities; socio-economic conditions (eg, community structure, family structure, social wellbeing); physical or cultural heritage; current use of lands and resources for traditional purposes by indigenous people; structures or sites that are of historical, archaeological, paleontological, or architectural significance.

### **D. Description of the environment**

### **E. Screening of potential environmental impacts and mitigation measures**

### **F. Institutional requirements and environmental monitoring plan**

### **G. Public consultation and information disclosure**

### **H. Findings and recommendation**

### **I. Conclusions**

### **J. Screening of potential environmental impacts and mitigation measures**

Using the checklist of environmental parameters for different sector projects, this section will screen out

—no significant impact from those with significant adverse impact by reviewing each relevant parameter

According to the following factors or operational stages, mitigation measures, where appropriate, will also be recommended environmental problems due to project location, and related to project design, construction, and operations. Potential environmental enhancement measures and additional considerations will also be covered.

#### **K. Institutional requirements and environmental monitoring plan**

This section should state the impacts to be mitigated, and activities to implement the mitigation measures, including how, when, and where they will be implemented. Institutional arrangements for implementation should be described. The environmental monitoring plan will describe the impacts to be monitored, and when and where monitoring activities will be carried out, and who will carry them out. The environmental management and monitoring costs should also be described.

#### **L. Public consultation and information disclosure**

This section will describe the process undertaken to involve the public in project design and recommended measures for continuing public participation; summarise major comments received from clients, local officials, community leaders, NGOs, and others, and describe how these comments were addressed; list milestones in public involvement such as dates, attendance, and topics of public meetings; list recipients of this document and other project related documents; describe compliance with relevant regulatory requirements for public participation; and summarise other related materials or activities, such as press releases and notifications. This section will provide of summary of information disclosed to date and procedures for future disclosure.

#### **M. Findings and recommendations**

This section will include an evaluation of the screening process and recommendation will be provided whether significant environmental impacts exist, needing further detailed study or EIA. If there is no need for further study, the IEE itself, which at times may need to be supplemented by a special study in view of limited but significant impacts, becomes the completed environmental assessment for the project and no follow-up EIA will be needed. If an EIA is needed, then this section will include a brief terms of reference (TOR) for the needed follow-up EIA, including approximate descriptions of work tasks, professional skills required, time required, and estimated costs. The bank's environment guidelines provides a guide for preparing the TOR for different projects.

#### **N. Conclusions**

This section will discuss the result of the IEE and justification, if any, of the need for additional study or EIA. If an IEE, or an IEE supplemented by a special study, is sufficient for the project, then the IEE with the recommended institutional and monitoring programme becomes the completed EIA.

## **II. Summary initial environmental examination report**

The summary IEE (SIEE) report is the executive summary of the IEE report. It describes the significant findings of the IEE report, and recommendations to manage them. The SIEE report should be presented clearly and concisely as a stand-alone document for submission to the board and disclosure to the public.

### **A. Introduction**

This section will include the purpose of the report, extent of the IEE study and brief description of any special techniques or methods used.

### **B. Description of the project**

This section will include the type of and need for the project; and project location, size or magnitude, operation and proposed schedule for implementation.

### **C. Description of the environment**

This section will include the physical and ecological resources, human and economic development, and quality of life values.

### **D. Forecasting environmental impacts and mitigation measures**

This section will identify “no significant impacts” from those with significant adverse impacts and will discuss the appropriate mitigation measures, where necessary.

### **E. Institutional requirements and environmental monitoring plan**

This section will describe the impacts to be mitigated, and activities to implement the mitigation measures, including how, when, and where they will be implemented. The environmental monitoring plan will describe the impacts to be monitored, and when and where monitoring activities will be carried out, and who will carry them out.

### **F. Public consultation and disclosure**

This section will describe the process undertaken to involve the public in project design and recommended measures for continuing public participation; summarise major comments received from clients, local officials, community leaders, NGOs, and others, and describe how these comments were addressed; list milestones in public involvement such as dates, attendance, and topics of public meetings; list recipients of this document and other project related documents; describe compliance with relevant regulatory requirements for public participation; and summarise other related materials or activities, such as press releases and notifications.

This section will provide of summary of information disclosed to date and procedures for future disclosure.

### **G. Findings and recommendations**

This section will include an evaluation of the screening process, and recommendation will be provided whether significant environmental impacts are present needing further detailed study or EIA. If there is no need for further study, the IEE itself, which at times may need to be supplemented by a special study in view of some small significant impacts, becomes the completed EIA for the project and no follow-up EIA will be needed.

If further additional study is needed, then this section will include a brief Terms of Reference (ToR) for the needed follow-up EIA, including approximate descriptions of work tasks, professional skills required, time required, and estimated costs. The bank's environment guidelines provides a guide for preparing the ToR for different projects.

### **H. Conclusions**

This section will discuss the result of the IEE and justification if any of the need for additional study or EIA. If an IEE or an IEE supplemented by a special study is sufficient for the project, then the IEE with the recommended institutional requirements and monitoring programme become the completed EIA.

## **ANNEX- E**

# **GENERIC OUTLINE FOR ENVIRONMENTAL MANAGEMENT PLAN**

The Environmental Management Plan (EMP) outlines the specific programmes proposed by the Project Team in discussion with the donor (when applicable) that will avoid, mitigate or compensate for anticipated environmental effects of the proposed project. The EMP is designed to provide a complete description of the various measures proposed by the Sponsor to avoid significant effects to the environment and provide the framework for monitoring and managing the effectiveness of the various mitigation and compensation measures. The EMP also provides a summary of the anticipated costs for implementing the measures and monitoring the effectiveness of those measures. The EMP provides an assessment of the potential risks that the mitigation measures are not effective and the responsibilities for remedying the adverse effects. It also provides a framework for mitigating un-anticipated environmental effects or unexpected effects of environmental catastrophes, statutory changes, etc. A suggested outline for the EMP follows.

Suggested Outline for Environmental Mitigation and Management Plan:

### **1. Summary of Impacts**

This section should summarize the predicted adverse environmental and social impacts that must be mitigated.

### **2. Description of Proposed Mitigation Measures**

This section should set out clear and achievable targets, and quantitative indicators of the level of mitigation required. Each measure should be briefly described in relation to the impact and conditions under which it is required. These should be referred to designs, development activities, equipment descriptions, and operating procedures and implementation responsibilities.

### **3. Description of Monitoring Programmes and Parameters**

This section should outline the specific monitoring protocols, parameters, and expected frequencies. It should identify objectives and specify the type of monitoring required; it also describes environmental performance indicators which provide linkages between impacts and mitigation measures identified in the EIA/IEE report – parameters to be measured, methods to be used, sampling location and frequency of measurements detection limits and definition of thresholds to signal the need for corrective actions.

### **4. Description of the Responsibilities for Mitigation and Monitoring Requirements**

This section should specify the institutional arrangements for implementation – taking account of the local conditions. Responsibilities for mitigation and monitoring shall be defined along with arrangements for information flow, and for coordination between

agencies responsible for mitigation. EMP specifies the organisations and individuals that will be responsible for undertaking the mitigating and monitoring measures, e.g., for enforcement of remedial actions, monitoring, training, and financing. The EMP may propose institutional strengthening activities including establishment of appropriate organization arrangements, and appointment of key staff and consultants.

## **5. Preliminary Cost Estimates**

To ensure that mitigation measures and monitoring are adequately funded, the EMP should contain preliminary cost estimates which needs to factored in the project/ programme budget. This section should also specify that the implementing agency needs to prepare detailed costs of implementation which shall include initial and recurring expenses for implementing all measures defined in the EMP integrated into the total project costs. All costs— including administrative design and consultancy, and operational and maintenance costs— resulting from meeting required standards or modifying project design should be captured. A budgeting plan should be attached to resolve the issues of how those costs are to be met.

## **6. Project Feedback and Adjustment**

The section should outline the procedures and mechanisms that will be used to modify and reshape the project in the light of monitoring results. A feedback mechanism, with proposed timing and procedures, should be included in the EMP to provide for modifications to the project/ programme, and the executing agencies.



**Content development panel**  
Md Ashaduzaman, BRAC  
Naznin Nasir, C3ER-BRAC University  
Nazria Islam, BRAC  
Mrityunjoy Das, BRAC

*This policy document is prepared by BRAC where Disaster Management and Climate Change (DMCC) programme facilitated the formulation process with support of different BRAC programmes, especially Finance and Accounts (F&A) department, Programme Development Resource Mobilisation and Learning (PRL), Human Resource and Learning Division (HRLD), Communications department, and the Centre for Climate Change and Environmental Research (C3ER) of BRAC University.*

**BRAC**

BRAC Centre  
75 Mohakhali  
Dhaka 1212  
Bangladesh

T : +88 02 9881265  
F : +88 02 8823542  
E : [info@brac.net](mailto:info@brac.net)  
W : [www.brac.net](http://www.brac.net)