



ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

Promoting private sector investment through large scale adoption of energy saving technologies and equipment for textile sector of Bangladesh

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List of acronyms

ADB	Asian Development Bank
AE	Accredited Entity
BAU	Business as Usual
BCCRF	Bangladesh Climate Change Resilient Fund
BCCSAP	Bangladesh Climate Change Strategy and Action Plan
BCCTF	Bangladesh Climate Change Trust Fund
BTMA	Bangladesh Textile Mills Association
CO2	Carbon Dioxide
DAE	Direct Access Entity
DG	Director General
DOE	Department of Environment
E&S	Environmental and social
ECA	Environment Conservation Act
ECA	Environment Court Act
ECC	Environment Clearance Certificate
ECR	Environment Conservation Rules
EDD	Environmental Due Diligence
EE	Electrical Efficiency
EHS	Environment, Health and Safety
ESIA	Environment and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESS	Environmental and social safeguards
ESSF	Environmental and Social Safeguards Framework
ETP	Effluent Treatment Plant
GCF	Green Climate Fund
GHG	Green House Gas
GoB	Government of Bangladesh

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GRC	Grievance Redressal Committee
IDCOL	Infrastructure Development Company Limited
IE	Implementing Entity
IEEF	Industrial and Energy Efficiency Finance
IFC	International Finance Corporation
INDC	Intended Nationally Determined Contributions
NAPA	National Adaptation Programme of Action
PS	Performance Standards
PUC	Pollution under Control
SPV	Special Purpose Vehicle
UNDP	United Nations Development Program
USD	United States Dollar
VEC	Valued Environment Component
WB	World Bank

1. Introduction

1.1 Background

This document is a Draft Environmental and Social Management Framework (ESMF) for the project 'Promoting private sector investment through large scale adoption of energy saving technologies and equipment for textile sector of Bangladesh' submitted to the Green Climate Fund for funding. The project will enable GHG emissions avoidance of 0.20 tCO₂e per year through energy efficiency in textiles sector of Bangladesh and contribute to mitigating climate change. Please refer to the Funding Proposal and Annexes thereof for details of the project.

The ESMF seeks to find answers to urgent issues such as water management, biodiversity conservation, sustainable forest management and combating global warming. These high priority issues are associated with the potential decline of ecosystem services which compromise human survival if not adequately addressed. From the social standpoint, sustainable development involves respect for human and labour rights, recognition of diversity and local cultures, and the reduction of poverty and income distribution inequality. Sustainable development also contributes to strengthening social and cultural ties.

1.2 Overview of project

The proposed program shall be executed via two components:

Component 1: Implementation costs and technical assistance activities.

For Component 1, GCF grant resources will finance third party expertise to provide technical assistance and develop non-financial mechanisms to support the implementation of the concessional loans and reduce risks for end borrowers, energy service and technology providers and LFIs. These resources will help guarantee a sound and efficient Program, while also ensuring local capacity building so that a permanent mechanism remains in place beyond the availability of donor support. Resources for bridging information asymmetries, bankable project structuring, dissemination and capacity building activities and other associated minor costs are also considered under this component. IDCOL will be the Executing Entity in coordination with textile sector borrowers.

Component 2: Energy Saving Technology Loan for Textile sector with Preferential Rates.

Under this component, IDCOL will provide term loans with preferential rates directly to textile sector borrowers who will utilize the fund received to adopt energy efficient appliances. The cost of purchasing the energy saving technology and equipment will be the main subject of the loan, which will be utilized by the borrowers to retrofit and/or expand their factories, processes and building infrastructure. The loan may also be utilized for ancillary costs of installing and operating the energy saving technology such as transport, assembly and installation, training and technical transfer, customs, insurance and auxiliary equipment, connection and accessories, and other incidental costs.

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The major activities under this component include but not limited to appraisal / due diligence of loan applications and project performance monitoring & evaluation. A pre-determined eligibility criterion for companies, minimum project/loan size, list of eligible energy saving technologies and equipment meeting pre-defined standards and specifications will facilitate a transparent, simplified and robust appraisal criterion for lending under the program.

The successful implementation of the sub-projects financed will contribute to reduce GHG emissions, supporting the achievement of the country's climate change goals. Program activities include financing and non-financing mechanisms that aim to improve the local technical capacity and knowledge on Electrical Efficiency (EE) investments by Implementing Entity (IEs) and textile factory owners.

This program envisages the creation of the fund with the kitty of USD 140 million, including USD 100 million of GCF funds in the form of Senior Loans, USD 20 million from IDCOL and private borrowers' equity investment in equal measure.

Figure 1: Overview of budget details

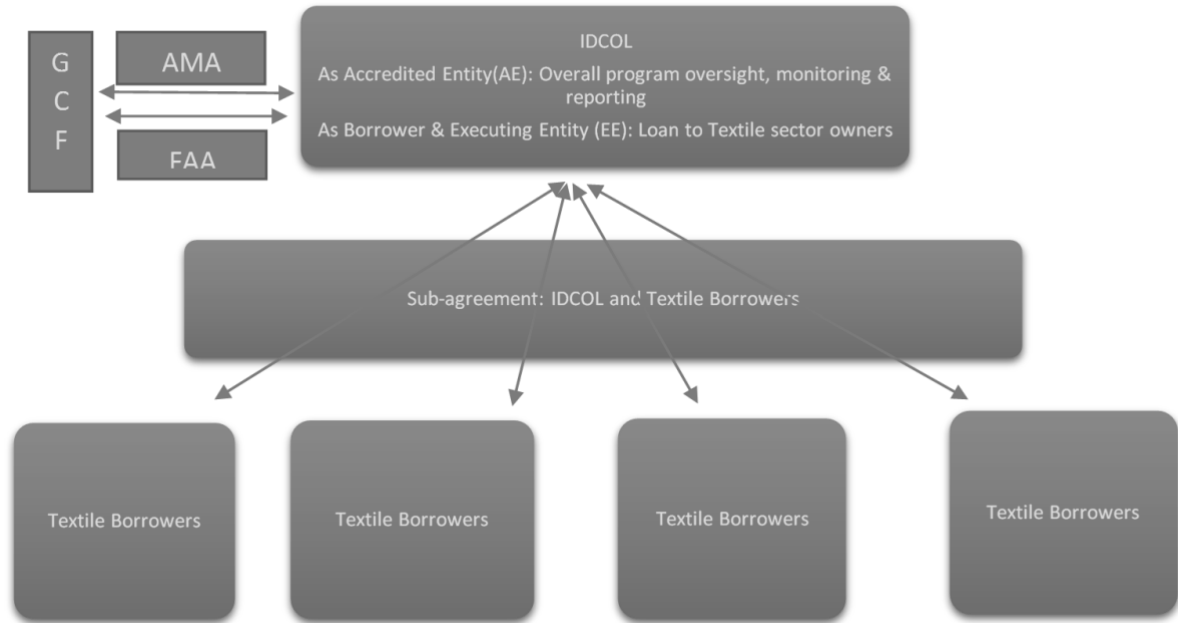
<p>Project Period:</p> <p>a) disbursement period: 05 years</p> <p>b) repayment period, if applicable: To GCF by IDCOL: 20 years (including 05 years grace period, from Year 06-20)</p> <p>To IDCOL by IE: Maximum 10 years for individual loan (including max 02 years grace period)</p>	<p>Amount:</p> <p>GCF Loan: USD 100.00 million</p> <p>Technical assistance (Grant) from GCF: USD 2.70 million</p> <p>Co-finance: USD 40.00 million</p>
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Implementation of this project can yield emissions reduction of 0.20 tCO₂eq per year and 4.00 MtCO₂ over 15-year lifetime by facilitating and scaling-up investment in energy efficiency improvements for 30 number of textile factories. Energy efficiency improvement projects include both equipment and technology measures in the selected textile factories.

1.3 Implementation arrangements

IDCOL will be the DAE (Direct Access Entity), arranging concessional loans from Green Climate Fund (GCF) to finance textile businesses in Bangladesh to adopt energy efficient appliances. IDCOL will be the borrower & Executing Entity (EE) where the Textile owners will be the Implementing Entity (IE). The 'Industrial and Energy Efficiency Finance (IEEF) unit' will channelize the loans to the ultimate beneficiaries, textile borrowers. This unit of IDCOL will be in primary contact with the borrowers. IDCOL will have separate role as Accredited Entity (AE) & Executing Entity (EE). The Implementation arrangement is proposed be as follows:

Figure 2: Contractual structure



2. Laws and policies

2.1 Review of legislative framework of Bangladesh

2.1.1 Environment and climate change

Bangladesh is presently emphasizing on environment laws and their enforcement in order to make the sector more competitive and effective. Although there are no specific environmental laws governing the textile sector but Environment Conservation Act (ECA) 1995 and Environment Conservation Rules (ECR) 1997 covers all environmental issues regarding textile sectors and these two laws are considered as the heart of Bangladesh's environment laws. These two laws cover all environmental aspects for all sectors in Bangladesh. Along with these guidelines regarding environmental issues these two laws are more effective under the Environment Court Act. For sludge management and disposal Ministry of Forest and Environment gave specific guideline¹ and under the same Ministry Clean Air Act is proposed to be enacted soon. Bangladesh has also specialized Environment Court under the Environment Court Act (ECA) 2010. Only ECA 1995 and any other law determined by the Government of Bangladesh's (GoB) gazette are effective under this Act².

A. The Environment Conservation Act (ECA) 1995

The Environmental Conservation Act (ECA) of 1995 is the main legislative document related to environmental protection in Bangladesh. This umbrella Act includes laws for conservation of the environment, improvement of environmental standards, and control and mitigation of environmental pollution. This Act justifies the establishment of the DoE and empowers its Director General to take necessary measures. The measures by the Director General (DG, the head of DoE) includes conducting inquiries, probable accidents, advising the Government, coordinating with other authorities or agencies and collecting & publishing information about environmental pollution. According to this act (Section 12), no industrial unit or project shall be established or undertaken without obtaining, in a manner prescribed by the accompanying Rules, an (ECC) from the Director General of the DOE. 28. The Act was amended in 2006 (SRO No. 175-Act/2006 dated August 29, 2006) on collection and recycling of used/non-functional batteries for the conservation of the environment, improving environmental standard and controlling and preventing environmental pollution. According to this amendment, no recycling of battery will be permitted without environmental clearance of DoE. This also restricts the improper disposal of used batteries or any parts of used battery in open place, water bodies, waste bins etc. All cast-off batteries must be sent to the DoE approved battery recycling industry at the earliest convenience and no financial transaction is allowed for used/ non-functional batteries. However, the act has been amended on the same issue again in 2008 (SRO No. 29-Act/2008 dated February 11, 2008) to allow financial transaction on mutually agreed fixed cost. Under the Bangladesh Environment Conservation

¹ (2019). Retrieved from

https://doe.portal.gov.bd/sites/default/files/files/doe.portal.gov.bd/publications/2398e6c5_c300_472d_9a0c_0385522748f3/Bangladesh%20Standards%20and%20Guideline%20for%20sludge%20managhttps://doe.portal.gov.bd/sites/default/files/files/doe.portal.gov.bd/publications/2398e6c5_c300_472d_9a0c_0385522748f3/Bangladesh%20Standards%20and%20Guideline%20for%20sludge%20management-%20September%202016.pdf

² Environment Court Act 2010, section 2c

(Amendment) Act 2003 it is stated that the Environment Court can dispose off environment-related cases as well as the general litigation and exercise the power and functions of the general civil courts in Bangladesh.

B. The Environment Conservation Rules (ECR) 1997

For the implementation of the 'Bangladesh Environment Conservation Act' 1995, "the Government has formulated the 'Bangladesh Environment Conservation Rules, 1997. The provisions of these Rules are elaborately formulated about the procedures for the implementation of the Bangladesh Environment Conservation Act, 1995. Under ECR 1997 any project or industry that create impact in the environment must take Environment Clearance Certificate (ECC)³ rule 7/1, and according to the category of the impacts created, the industries/projects are divided into four groups:

- a. Green
- b. Orange-A
- c. Orange-B
- d. Red

Focussing on the ECA1995⁴, section 12, following the rule 7 and all required sub-rules of rule 7, any project or industry can get ECC. Procedure for issuance of Pollution under Control (PUC) certificate is described under rule 7A. Restriction on import etc. of catalytic converter and diesel particulate filter is described under rule 7B. The factories must check the validity period of ECC under rule 8, regarding determination of the standards for discharge and emission of waste factories or any project falls under those four categories must follow rule 13. Obtaining ECC is crucial and this is valid only for a certain period and fees for ECC and its renewal is described under rule 14 of the ECR 1997. According to ECA 1995 for violation of a provision or for non-compliance of a direction, or for the activities specified, the penalty mentioned against them may be imposed.

Under ECR 1997 four forms are given for different purposes and claims, namely forms 1 to 4. Application for remedy and its due process is mentioned, notice of intention for collection of samples, application for ECC and PUC certificate these are the four issues for which four forms are being used at present.

Under the same rule ECR 1997, 14 schedules are given for different procedures of maintaining standards and fees, from schedule (1-14), classification of industrial units or projects based on its location and impact on environment, standards for air quality, water, sound, sound originating from motor vehicles or mechanized vessels, emission from motor vehicles, emission from mechanized vessels, odour, sewage discharge, waste from industrial units or projects waste, gaseous emission from industries or projects, sector-wise industrial effluent or emission, fees for ECC or renewal, fees to be realized by the Department of Environment for supplying various analytical information or data or test results of samples of water, effluent, air and sound.

C. The Bangladesh Environment Conservation (Amendment) Act, 2010

³ Environment Conservation Rules 1997

⁴ Environment Conservation Act 1995

This amendment of the act introduces new rules and restrictions on:

- a) Ensuring proper management of hazardous wastes to prevent environmental pollution and health risk;
- b) No remarked water body cannot be filled up/changed; in case of national interest; it can be done after getting clearance from the respective department; and
- c) Emitter of any activities/ incident will be bound to control emission of environmental pollutants that exceed the existing emission standards.

D. Bangladesh Climate Change Strategy and Action Plan (BCCSAP) 2009

Bangladesh Climate Change Strategy and Action Plan (BCCSAP) published by the Ministry of Environment and Forests, is a knowledge strategy built upon the National Adaptation Programme of Action (2005 and 2009). It sets out 44 programmes to be taken by Bangladesh over the short, medium and long term within six strategic areas:

- Food security, social protection and health
- Comprehensive disaster management
- Infrastructure
- Research and knowledge management
- Mitigation and low carbon development
- Capacity building and institutional strengthening

A common theme throughout of all these strategic areas is the focus on the poor and vulnerable women and children. All programmes are expected to provide synergies with the government's Vision 2021.

E. The Climate Change Trust Fund Act 2010

The Act was passed as the government's quick-start domestic response to climate change adaptation activities, which are planned through the BCCSAP. As such this Act is closely linked to the BCCSAP. It stipulates allocating an initial budget of USD100 million per year for three years between 2009 and 2011. It stipulates that 66% of its budget will be spent on the implementation of projects/programmes prioritised in the BCCSAP. The remaining 34% will be maintained as a deposit for emergencies. Interest accrued on the deposit will be spent on project implementation. Funds from the BCCTF can be used to finance public sector and non-government projects. It is not mandatory to spend the total grant within a given financial year.

F. National Energy Policy 1995

National Energy Policy (1995) aims to promote sustainable economic growth by developing energy sources and engaging the public and private sector to participate in the management of the energy sector. This policy sets the overall framework for the improved performance of the energy sector. The objectives are to provide energy for sustainable economic growth, ensure optimum development of all the indigenous energy sources (oil and gas, coal, hydropower), ensure sustainable operation of the energy utilities, ensure rational use of total energy sources, ensure environmentally sound energy development programs, encourage public and private sector participation in the development and management of the energy sector, bring entire country under electrification by the year 2020, ensure reliable supply of energy to the people at reasonable and

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affordable price, and develop a regional energy market for rational exchange of commercial energy to ensure energy security.

G. (Intended) Nationally Determined Contributions (INDC) 2015

With respect to Bangladesh's contribution to global efforts to counter climate change, the INDC sets out several mitigation actions that will help limit the country's GHG emissions. It consists of the following key mitigation elements:

- An unconditional contribution to reduce GHG emissions by 5% from Business as Usual (BAU) levels by 2030 in the power, transport and industry sectors, based on existing resources.
- A conditional 15% reduction in GHG emissions from BAU levels by 2030 in the power, transport, and industry sectors, subject to appropriate international support in the form of finance, investment, technology development and transfer, and capacity building.

To enhance climate change adaptation activities in all key policies and sectors, Bangladesh has recently established two innovative funds: the Bangladesh Climate Change Trust Fund (BCCTF) from the Government's own budget and the Bangladesh Climate Change Resilient Fund (BCCRF) with the support of development partners. Bangladesh submitted the National Adaptation Programme of Action (NAPA) in 2005 (revised in 2009) and prepared a climate change action plan (the Bangladesh Climate Change Strategy and Action Plan in 2009). It outlines and recommends mitigation actions for carrying out energy audits to incentivise the uptake of energy efficiency and conservation measures in the main industrial sectors based on the Bangladesh Energy Efficiency and Conservation Master Plan 2030 and sets a target of 10% energy consumption reduction in the industry sector compared to the business as usual⁵.

The project complies with and advances the priority areas of the INDC Bangladesh 2015 and Bangladesh Climate Change Strategy and Action Plan (BCCSAP) 2009.

H. The Building Construction Act 1952

The Act provides regulations regarding setbacks, building heights etc in urban areas. The act also provides restrictions on haphazard construction of buildings and excavation of tanks which are likely to interfere with the planning of certain areas in Bangladesh and enables government (section 16) to make any substantial rules for carrying out the purposes of this Act.

I. Building Construction Rules, 2008

These rules superseded the previous Building Construction (BC) rules of 1984. These rules seek to control development plot-by-plot and case-by-case. It controls development by imposing conditions on setbacks, site coverage, construction of garages, access to the plot, provisions of lift, land use of that plot and height of the building. Restricting the height of a building in BC Rules 1996 helps to control the density of an area and manage the growth of the city in some way. The Dhaka Metropolitan Building Construction Rules 2008 superseded the earlier set of rules issued in 1996 for the Dhaka Metropolitan Area and provided more authority to RAJUK in the following way: a) Clear-

⁵ Nationally Determined Contributions (NDC) 2015

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cut responsibility to monitor the development of the city; b) Spread out the responsibilities to various actors; c) Spelled out responsibilities of building designers, structural engineers, site supervisors and their penalties etc.

J. Bangladesh National Building Code (BNBC) 2014

Bangladesh National Building Code widely known as BNBC Code is the ultimate code that is followed in Bangladesh to build safe houses and buildings. Earthquakes and wind effect of different building systems are incorporated in this code. Moreover, this code is almost like ACI code which is recognized as one of the most practiced building codes of the world. However, there are some differences in that as it incorporates modifications by keeping in view the biological, environmental and geological factors in Bangladesh. Moreover, socio-economic factors have also been taken into consideration while preparing this code.

K. The Acquisition and Requisition of Immovable Property Ordinance, 1982

In 1982, the Acquisition and Requisition of Immovable Property Ordinance came in force. This law is the major basis for all the present actions regarding acquisition, resettlement and rehabilitation issues. The relevant and salient features of the law include the matters to be considered in determining compensation: a) the market value of the property; b) damage to standing crops or trees due to the acquisition; c) damage due to severance of acquired property from other property at the time of the actual taking of permission by concerned authorities; d) damage to other properties or earnings; e) expenses for relocation of residence; and f) damage due to lowering of profit of the property to be acquired between the serving of acquisition notice and the actual acquisition.

The present laws, acts, regulations and rules are not very explicit regarding resettlement and rehabilitation of project-affected persons (PAPs). Here entitlement means the rights of the persons adversely affected by the project to receive certain benefits from the project authorities to compensate for their losses which may include land and other immovable property, income, standing crops, occupation etc. The compensation is often in terms of cash grants but also includes training and credit facilities and other necessary facilities for resettlement and rehabilitation.

2.1.2 Social

Several activities under various components would require skilled, semi-skilled and unskilled labour. Major laws governing the labour and working conditions are as given below:

L. Bangladesh Factories Act 1965

The Act pertains to the occupational rights and safety of factory workers and the provision of a comfortable work environment and reasonable working conditions. This Act provides for inspection of factories and regulates matters related to hygiene, ventilation, overcrowding, night work, safety, dangerous machinery, leave, overtime, canteens and child care facilities. The Act prohibits employment of children under the age of 14 years in factories. Children over the age of 14 shall be registered and subject to provisions regarding hours of work. Factories Act 1965 (originally East Pakistan Factories Act 1965) was adopted by the then Government with the objective of regulating the appointment of workers, their wages and the working conditions in factories including health and hygiene, safety, welfare, working hours, leave and holidays and punishments and penalties for both the owners and workers for noncompliance of the requirements. The Act has 11 chapters and 116 main sections. It incorporates the provisions for obtaining approval of factory plans, including

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the construction or extension, class or description of factories from the chief inspector. According to the Act, every factory is to be maintained clean and free from effluents arising from any drain, privy or other nuisance. Effective arrangements are to be made in every factory for the disposal of wastes and effluents, prevention of accumulation of dust and fume, and proper ventilation and maintenance of room temperature. The Act requires that factory must ensure adequate fire safety measures, appropriate means of escaping in case of fire, and protection against dangerous and accident-prone parts of machinery, electric and mechanical devices, self-acting machines, etc. Workers are to be given proper training before they are employed on dangerous machines. Controlling appliances of cranes and other lifting machines, hoists and lifts must be of good construction, sound material, and adequate strength. Other sources of dangers, such as pits, sumps, openings in floors etc., should be securely covered or fenced and effective screens or suitable goggles should be provided to workers to protect their eyes. Every factory is to have adequate and suitable facilities for washing and bathing and provide first-aid medicines and appliances.

M. Bangladesh Labor Act 2006: (Amendment 2013, 2015)

Labor relations in Bangladesh are governed according to Bangladesh Labor Act of 2006 (Amended in 2013) and Labor Rules of 2015. The amendments to the 2006 Labor Act made it more consistent with the International Labor Standards. The new labor law has 87 sections of amendments to strengthen workers' rights including better protections related to freedom of association (i.e. to form trade unions) and improving occupational health and safety conditions. The Bangladesh Labor Act and the Labor Rules of 2015 (made under the Act) are consistent with ILO's core conventions ratified by Bangladesh except ILO 138 (Minimum Age Convention). However, consistently with ILO 138, the Bangladesh Labor Act provides that the minimum age to work is 14 (although a special clause states that children between the ages of 12 and 14 may be employed to do "light work" that does not endanger their health, development, and education).⁷ 40. The Act pertains to the occupational rights and safety of factory workers and the provision of a comfortable work environment and reasonable working conditions. In chapter VI of this law safety precaution regarding explosive or inflammable dust/gas, protection of eyes, protection against fire, works with cranes and other lifting machinery, lifting of excessive weights are described whereas in the Chapter VIII provision safety measures like appliances of first aid, maintenance of safety record book, rooms for children, housing facilities, medical care, group insurance, etc. are illustrated.

N. The Accord on Fire and Building Safety in Bangladesh (the Accord):

The Accord is a legally-binding agreement between global brands & retailers and Industrial Global Union & UNI Global Union and eight of their Bangladeshi affiliated unions to work towards a safe and healthy garment and textile industry in Bangladesh. This agreement was signed in the immediate aftermath to the Rana Plaza building collapse on 24 April 2013, which killed 1,133 workers and critically injured thousands more. Over 220 companies signed the five-year Accord, and by May 2018, the work of the Accord had contributed to significantly safer workplaces for millions of Bangladeshi garment workers.

To maintain and expand the progress achieved under the 2013 Accord, over 190 brands and retailers have signed the 2018 Transition Accord with the global unions, a renewed agreement which came into effect on 1 June 2018.

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ACCORD Agreement focuses on key aspects and features as enlisted below:

1. Legally-binding agreement between brands & trade unions
2. Brand commitment to ensure safety remediation is completed & financially feasible
3. Independent safety inspections & remediation program
4. Disclosure of inspection reports & corrective action plans
5. Safety Committee and Safety Training Program
6. Safety and Health Complaints Mechanism
7. Protection of right to refuse unsafe work
8. Ongoing promotion of Right to Freedom of Association (FoA) to advance safety
9. Training and Complaints Protocol to cover FoA rights
10. Optional listing of home textiles and fabric & knit accessory suppliers
11. Transition of Accord functions to a national regulatory body

O. Review of social policy and regulatory framework in Bangladesh

Social regulatory frameworks in Bangladesh related to social safeguards are lined with several legislative enactments established in last several decades and some enactments are already amended according to the national interests.

Whenever it appears to the Government that any property in any locality is needed or is likely to be needed for any public purpose or in the public interest, the property is acquired using eminent domain. Land acquisition by eminent domain for infrastructure projects is governed by the Government of Bangladesh's Acquisition and Requisition of Immovable Property Act (ARIPA) 2017. The Act supersedes earlier laws including the Land Acquisition Law of 1894 and the Acquisition and Requisition of Immovable Property Ordinance 1982. In addition to the Act, acquisition of any land or forest area in Chittagong Hill-Tracts (CHT) districts requires consent under the Chittagong Hill-Tracts (Land Acquisition) Regulation (1958), the CHT Regional Council Act 1998 and the Forest Act (1927). Forest reserves, natural water-bodies, archaeological sites and historical places are not acquired for development projects. Under the Ordinance, the Deputy Commissioner (DC) is entrusted to acquire land for any public infrastructure project. The requiring body, after getting the approval of the administrative ministry, requests DC to undertake the acquisition of the required land as per its proposal.

The fundamental rights under the Constitution indicate the general guidelines for a policy on resettlement/rehabilitation of citizens adversely affected (whatever be the mechanism) due to any activity of the State. Article 40 of the constitution states categorically that every citizen has the right to practice any lawful occupation which implies anything that impedes the right (a) should not be done or (b) there should be supplementary measures to make good the losses incurred by the citizen. Resettlement and rehabilitation of adversely affected people due to infrastructure projects very clearly falls within this requirement for supplementary measures. However, as per Article 42, sub-clause 2, no law with the provision of compensation for acquisition of land can be challenged in a court claiming such compensation has been inadequate.

The Acquisition and Requisition of Immovable Property Ordinance II (1982) is the basic instrument governing land acquisition in Bangladesh. It is restricted to "legal" owners of the property as supported by records of ownership such as deeds, title or agreements to compensate for land as well as any business, structure, trees and crops on the land. The Ministry of Land (MoL) is authorized to deal with land acquisition. The MoL delegates some of its authority to the

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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.

The East Bengal State Acquisition and Tenancy Act, 1950, revised in 1994, (Sections 86 & 87) also define the ownership and use right of alluvion (payosti or reformation in situ or original site) and Diluvion land (nadisikosti) in the country. In legal terms, eroded lands (sikosti) inside the Alluvion-Diluvion (AD) line (i.e. including submerged land or underwater land) are considered khas land once declared by demarcating the AD Line. However, the "original" owner(s) can claim the land if it reappears through the natural process within 30 years.

The Government has prepared a draft national policy on involuntary resettlement and rehabilitation in 2008 which is consistent with the general policy of the Government that the rights of those displaced by development projects, river erosion and Bastee eviction, shall be fully respected and that those displaced shall be treated with dignity and assisted in such a manner that safeguards their welfare and livelihoods irrespective of title, gender, and ethnicity. 53. **Laws and Policies on Small Ethnic Community:** In the context of the People's Republic of Bangladesh, the Constitution of Bangladesh does not mention the existence of the cultural and ethnic minorities in Bangladesh. The only protective provision for the Small Ethnic Community that the policy makers often refer to in the context is Article 28 (4) which states that nothing shall prevent the state from making special provision in favour of women and children or for the advancement of any backward section of the citizens. The above provision is an ambiguous one and it does not define who or what constitutes 'backward'.

However, the Government recognizes the existence of 'tribal communities' and the need for special attention and in general, tribal people are essentially viewed as backward, poor and socio-economically & culturally inferior. Towards this end, a special program was initiated in 1996-97 by the Prime Minister's Secretariat aiming at improving the socio-economic situation of the indigenous people of Bangladesh, residents outside the Chittagong Hill Tracts.

The Chittagong Hill Tracts Regulation, 1900 (Regulation I of 1900) is the regulatory Framework for State sovereignty over the traditional rights of the adibasis living in the CHT region. They are governed through Revenue Circle Chiefs who are local revenue collectors vide an amalnama (authorization by the Government). The Deputy Commissioner and the Commissioner from the central government reserve the authority to settle land to the hill-men or non-hill residents or lease out land (non-transferable) for rubber plantation or establishing industries in the CHTs.

The Forest Act, 1927 (Act XVI of 1927) revised as of 2000 deals with reserved forest, village forest, protected forest, control over forests on lands not being the property of government.

On 24 May 1998, The National Parliament of Bangladesh passed the Peace Accord 1997 as the Chittagong Hill Tracts Regional Council Act, 1998 (Act 12 of 1998). In addition to re-establishing peace, the Accord recognized the ethnic people's right to land, culture, language, and religion. The Accord set out detailed provisions for strengthening the system of self-governance in the CHT and redressing the most urgent land-related problems. A ministry on CHT Affairs was established by appointing a Minister from among the adibasis of hill districts. An Advisory Council from the CHT region assists this ministry. However, there is a demand for extending the scope of the CHT Affairs Ministry to include the adibasis in other areas of the country. 58. **Small Ethnic Community rights in Poverty Reduction Strategic Paper (PRSP), 2005** includes strategic suggestions to preserve the cultural, social and economic identity and interests of the ethnic populations in and outside CHT.

All the above laws and other necessary legal provisions would be followed during execution of the project. Primary responsibility of the adherence to these requirements would be by implementing entities and AE would ensure the necessary monitoring and reporting of the aspects related to labour and working conditions.

2.2 Review of IDCOL Social and Environmental Standards

IDCOL has a mandate of financing private sector for developing medium to large-scale infrastructure and energy efficiency-renewable energy projects in Bangladesh. IDCOL recognizes the significance of environmental, health / safety and social considerations in infrastructure development and believes in sustainable development.

To achieve the above, IDCOL is committed to:

- (a). Mainstream environmental, health / safety and social (E&S) considerations in appraising and financing infrastructure projects to avoid / minimize adverse impacts and risks to the environment and people that may be affected
- (b). Ensure compliance with all relevant E&S policy and legislative requirements and laws of the lands with which it engages and remain responsive to the E&S requirements of international best practices
- (c). Avoid / minimize land acquisition and resettlement through selection of appropriate locations and design of projects
- (d). Where land acquisition is unavoidable, compensate replacement value of such acquired land/ property will be paid before displacement or replace with land having equal value and quality together with other facilities such as housing and basic infrastructure facilities.
- (e). Ensure protection of vulnerable groups, such as the economically and socially disadvantaged, women, children, physically handicapped and indigenous people and take appropriate measures to restore their livelihood as relevant.

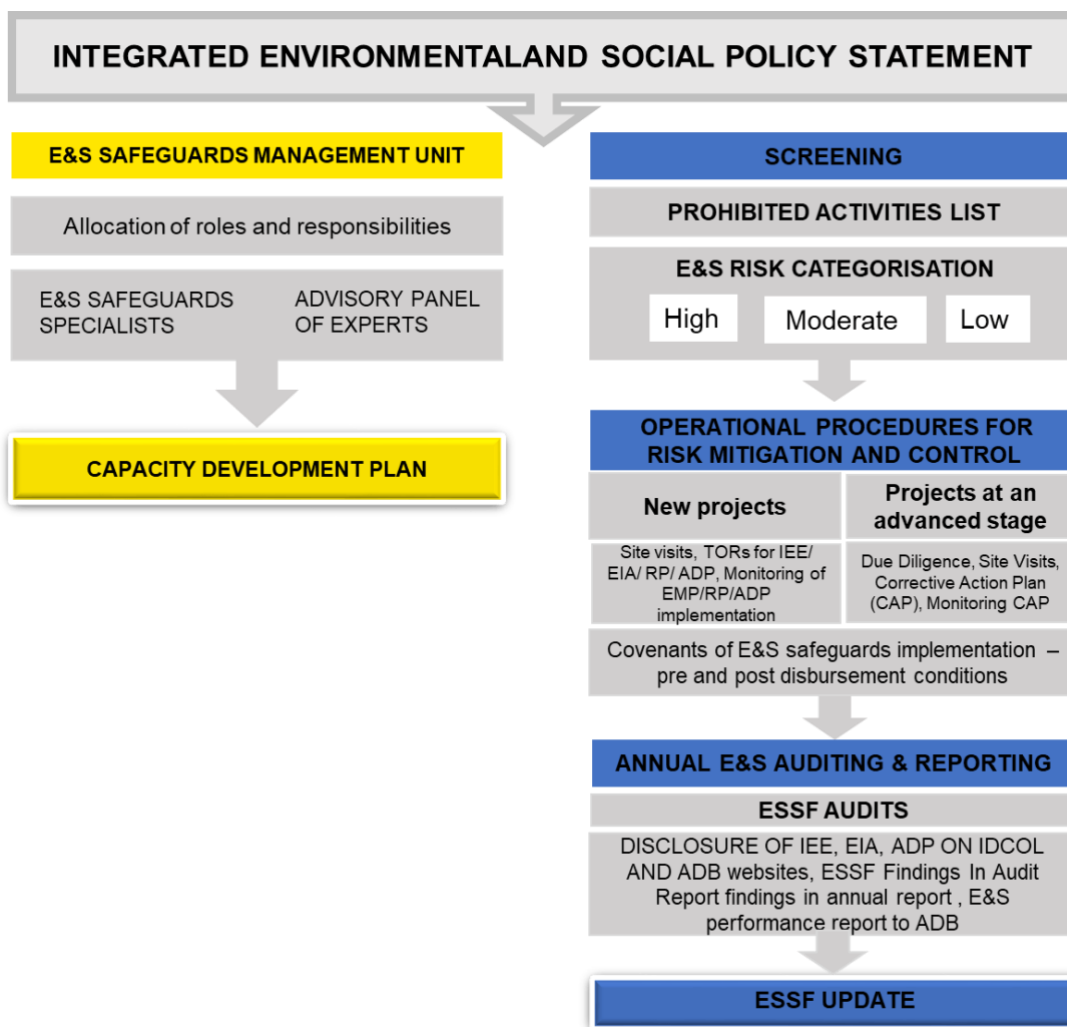
The objectives of IDCOL ESSF are to:

- Assess infrastructure projects being funded by IDCOL, for their environmental and social (E&S) impacts, early in the project lifecycle or IDCOL's entry in to the project whichever applicable
- Identify and fulfil all E&S obligations put forth by various external stakeholders (GoB institutions and Global Financial Institutions such as ADB, WB, IFC, etc.)
- Ensure E&S legal compliance of the projects
- Influence and mandate (as relevant) clients and downstream agencies to ensure legal compliance and manage E&S risks
- Define and outline policies, procedures, roles, and responsibilities for managing impacts, risks, and effects on environment, involuntary resettlement and *Adibasi*⁶ people of subprojects that are financed by IDCOL.

⁶ Groups referred to by international organizations as Indigenous Peoples can be referred to in Bangladesh as ethnic minorities or adibasi(s). Adibasi is the term employed in the draft "National Policy on Involuntary Resettlement and Rehabilitation, 2008." Adibasis in Bangladesh include Chakmas and other groups in the Chittagong Hills, Garos in Madhupur Forest, Khasis in Sylhet, Rakhains in Coxsbazar/ Patuakhali and Santhals in Rajshahi/Dinajpur and other smaller communities in the country.

The Environmental and Social Safeguards Framework (ESSF) of IDCOL can be explained through the following flow diagram.

Figure 3: The Environmental and Social Safeguards Framework (ESSF) of IDCOL⁷



IDCOL requires, for every project that clears the List of Prohibited Investment Activities (Energy efficiency clears the list provided in IDCOL ESSF), the risk rating criteria be followed in the ESSF for projects. This is applicable to both Greenfield projects as well as existing/ retrofit based projects where IDCOL is financing. A brief snapshot of the criteria is presented below.

- a. For new projects, does the project have any pending compliance such as Location and Environmental Clearance based on its category (Red, Orange-A, Orange-B and Green), from the DOE?
For refinancing projects, does the project have a pending DOE Clearance or pending necessary operating licenses and permits on EHS from respective regulatory authorities?

⁷ The Environmental and Social Safeguards Framework (ESSF), Policy and Procedures, IDCOL, 2011

- b. Is the project 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)? Ref: Draft Environmentally Critical Areas Rules, 2010
- c. Does the project construction and/or operation lead to environmental impacts that are diverse, irreversible and / or unprecedented in nature? Refer to IEE/EIA reports if available or Environmental Due Diligence (EDD) during site visit, to answer this question.
- d. Does the project require involuntary resettlement that results in loss of land or livelihoods or physically displaces more than 200 persons?
- e. Is the project 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?
- f. Is the project vulnerable to climate change related impacts?

E&S Capacity of the Borrower

- a. Does the Borrower have a documented Policy on E&S Performance?
- b. Does the Borrower have dedicated human resources to address E&S performance?
- c. Has the Borrower established and implemented Environmental, Health & Safety Management Systems and Social Accountability Systems for the Project SPV or in the parent company?

2.3 Review of GCF Environment and Social Safeguards

At its Board meeting dated 19 June 2014, the GCF adopted the IFC standards as Interim environmental and social safeguards. The eight Performance Standards (PS) and the objectives of each are described below.

1. PS1: Assessment and management of environmental and social risks and impacts:
The objectives of the performance standard 1 are:
 - a) Identify funding proposal's environmental and social risks and impacts;
 - b) Adopt mitigation hierarchy: anticipate, avoid; minimize; compensate or offset;
 - c) Improve performance through an environmental and social management system;
 - d) Engagement with affected communities or other stakeholders throughout funding proposal cycle. This includes communications and grievance mechanisms.
2. PS2: Labour and working conditions
The objectives of the performance standard 2 are:
 - a) Fair treatment, non-discrimination, equal opportunity;
 - b) Good worker–management relationship;
 - c) Comply with national employment and labour laws;
 - d) Protect workers, those in vulnerable categories;
 - e) Promote safety and health;
 - f) Avoid use of forced labour or child labour.
3. PS3: Resource efficiency and pollution prevention
This Performance Standard outlines a project-level approach to resource efficiency and pollution prevention and control in line with internationally disseminated technologies and practices. The objectives of the Performance Standard 3 are:

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- a) Avoid, minimize or reduce project-related pollution;
- b) More sustainable use of resources, including energy and water;
- c) Reduced project-related greenhouse gas emissions.

4. PS4: Community health, safety and security

While acknowledging the public authorities' role in promoting the health, safety, and security of the public, this Performance Standard – 4 addresses the client's responsibility to avoid or minimize the risks and impacts to community health, safety, and security that may arise from project related-activities, with attention to vulnerable groups. The objective of Performance Standard 4 is:

- a) To anticipate and avoid adverse impacts on the health and safety of the affected community;
- (a) To safeguard personnel and property in accordance with relevant human rights principles

5. PS5: Land acquisition and involuntary resettlement

Performance Standard 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. The objective of Performance Standard 5 is:

- (a) Avoid/minimize adverse social and economic impacts from land acquisition or restrictions on land use:
 - I. Avoid/minimize displacement;
 - II. Provide alternative project designs;
 - III. Avoid forced eviction.
- (b) Improve or restore livelihoods and standards of living;
- (c) Improve living conditions among displaced persons by providing:
 - I. Adequate housing;
 - II. Security of tenure.

6. PS6: Biodiversity conservation and sustainable management of living natural resources

The objective of Performance Standard 6 is:

- (a) Protection and conservation of biodiversity;
- (b) Maintenance of benefits from ecosystem services;
- (c) Promotion of sustainable management of living natural resources;
- (d) Integration of conservation needs and development priorities

7. PS7: Indigenous peoples

Performance Standard 7 recognizes that Indigenous Peoples, as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalized and vulnerable segments of the population.

Consequently, Indigenous Peoples may be more vulnerable to the adverse impacts associated with project development than non-indigenous communities. This vulnerability may include loss of identity, culture, and natural resource-based livelihoods, as well as exposure to impoverishment and diseases. The objective of Performance Standard 7 is:

- (a) to ensure full respect for indigenous peoples
 - I. Human rights, dignity, aspirations;

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- II. Livelihoods;
- III. Culture, knowledge, practices;
- (b) To Avoid/minimize adverse impacts;
- (c) Sustainable and culturally appropriate development benefits and opportunities;
- (d) Free, prior and informed consent in certain circumstances.

8. PS8: Cultural heritage

The objective of Performance Standard 8 is:

- (a) Protection and preservation of cultural heritage;
- (b) Promotion of equitable sharing of cultural heritage benefits.

The International Finance Corporation (IFC) PS can be viewed at:

http://www.ifc.org/wps/wcm/connect/c8f524004a73daeca09afdf998895a12/IFC_Performance_Standards.pdf?MOD=AJPERES

In relation to this project, the following table summarises the following IFC performance standards to be applicable:

Table 1: Applicability of IFC Performance Standards

IFC Performance Standards	Applicability	Rationale
Assessment and Management of Environmental and Social Risks & Impacts / Performance Standard 1	YES	Eligible projects in the energy efficiency sector may have E&S impacts. PS1 aims at identifying E&S risks and defining appropriate mitigation measures to avoid or minimize such risks. It defines the relevant scope of E&S risk management for a project, the necessary organizational capacity, and monitoring processes. Focus is put on stakeholder engagement, included disclosure of information, consultation and participation of communities, indigenous peoples, and grievance mechanisms.
Labour and Working Conditions / Performance Standard 2	YES	Projects financed by the Programme must ensure proper labour and working conditions in their internal organization, but also for their contractors. PS2 requirements are applicable during both construction and implementation phases of projects.
Resource Efficiency and Pollution Prevention / Performance Standard 3	YES	E&S risk assessment to be conducted on each individual project must identify the possible negative impacts of all kinds of pollution on communities and the environment, included over use of natural resource such as water consumption. PS3

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IFC Performance Standards	Applicability	Rationale
		applies on all projects that may have such impacts, and not limited to construction phase.
Community Health, Safety, and Security / Performance Standard 4	YES	In line with PS3, E&S risk assessment to be conducted on each individual project will consider community health, safety and security aspects both on project owners and their contractors, all along a project's lifecycle.
Land Acquisition and Involuntary Resettlement / Performance Standard 5	NO	Projects under this programme will not involve chances of physical displacement and economic displacement as projects involving land acquisition involving IR will not be eligible.
Biodiversity Conservation and Sustainable Management of Living Natural Resources/ Performance Standard 6	NO	There is no activity envisaged under this programme that threatens biodiversity and living natural resources.
Indigenous Peoples (IPs) / Performance Standard 7	NO	PS7 applies for all projects that might have impacts on IPs, such impacts being identified through the initial E&S risk assessment. Prior, and informed consent must be applied when IPs are affected by a project in the circumstances defined by PS7. Since no involuntary resettlement is anticipated in this programme, any activity under it that impacts IP will not be permitted and hence does not trigger PS 7.
Cultural Heritage / Performance standard 8	NO	PS8 defines cultural heritage including both tangible objects and sites, and intangible forms of culture. Under this project, no intervention in the heritage sites is envisaged.

Performance Standard Guidance Notes: A set of eight Guidance Notes, corresponding to each PS, offers guidance on the requirements contained in the PS. In addition, the World Bank Group Environmental, Health and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of good international practice and are linked to the PS through PS2 and PS3.

The Guidance Notes and EHS Guidelines can be found at:

http://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/IFC+Sustainability/Sustainability+Framework/Sustainability+Framework+-+2012/Performance+Standards+and+Guidance+Notes+2012/

The Green Climate Fund has its own Environment and Social Policy which presents the commitments of the Fund and articulates the principles and standards to which GCF will hold itself

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accountable. This document captures the policy as adopted by the Board in decision B.19/10. The policy was sent to the Board for consideration at B.19 in document GCF/B.19/06 titled “Environmental and social management system: environmental and social policy”. The policy defines how GCF will manage the environmental and social risks and impacts, and how GCF will support the overall sustainability of its operations and investments in line with its obligations under national and international law and other relevant standards. The Environment and Social Policy of GCF can be found at:

<https://www.greenclimate.fund/documents/environmental-social-policy>

2.4 Procedures for Classification of the Environmental Risk Category of the Project

All projects framed according to the Equator Principles are classified depending on the magnitude of their social and environmental risks and impacts. The classification system, developed by the IFC, is described in the chart below:

Category as per IFC PS or GCF	Impact/ Risk	Main features	Requirements
A or 11	High	Projects with risk potential and / or significant adverse environmental and social impacts (multiple, irreversible or unprecedented).	Independent auditor to be hired to undertake <i>Due Diligence</i> and periodic environmental and social monitoring.
B or 12	Medium	Projects with risk potential and/or a limited number of adverse environmental and social impacts, generally local, possibly reversible and controllable by mitigation measures.	Environmental and social audit to fulfil the same requirements as under Category A. No environmental and social audit: environmental and social documentation, project Action Plan and EMS to be submitted.
C or 13	Low	Projects with reversible environmental and social impacts, with minimal risks and easy mitigation/compensation.	Environmental and social documentation to be compliant and Action Plan to be presented, if applicable.

Several factors influence the categorization of a project. These include the scale, location, sensitivity and magnitude of a project's impacts, and can vary according to its specific characteristics.

Category A

Projects with potential risk and / or significant adverse environmental and social impacts that are multiple, irreversible or unprecedented are categorized as Category A ("high risk"). In

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these projects the borrower is required to hire an independent environmental and social auditor to prepare for Due Diligence and periodic environmental and social monitoring.

Category B

Projects with a limited risk potential and/ or the possibility of limited social and environmental impact that are few and are usually local, possibly reversible and controllable by means of mitigation measures, are classified as “medium” impact / risk Category B projects. If some impacts/ risks require closer attention, an audit company may be hired to prepare Due Diligence, as in Category A.

If, after the evaluation of Due Diligence the project is deemed to require periodic follow-up by independent auditors the procedures to be followed will be the same as those applied to "high" impact projects. If the project does not require monitoring by independent auditors, the borrower is responsible for providing monitoring reports of the works or operations at intervals defined by IDCOL. If IDCOL identifies any inconsistency and/or environmental and social risk, it can request the hiring of independent auditors to monitor the project. The environmental and social monitoring of projects (with or without an audit) should take place at least annually for Categories A and B.

Category C

Low risk/ impact Category C projects are those with reversible environmental and social impacts and which present minimal risks or risks involving easy mitigation/ compensation. In these cases, the borrower, in addition to providing environmental and social documentary proof of compliance with the environmental agency, is also required to prove that there is an environmental and social management and risk system and can present an Action Plan designed to fulfil the conditions of environmental licenses and plans required by the environmental agency and/ or other parties involved.

The envisaged Environmental and social safeguards (ESS) category for this project under consideration is Category B or Category 12 as per GCF nomenclature, given that IDCOL will extend and administer loans to textile and garment companies. This project will involve investments in financial intermediaries or through delivery mechanisms involving financial intermediation. Risk would involve increased water pollution from textile companies and on labour management and working conditions that is ESS2, specifically worker's rights, welfare, protection and occupational health and safety, especially in garment manufacturing. These risks can be easily mitigated by appropriate policies and standards workplace systems and equipment.

2.5 Consultation summary

The project was conceived based on stakeholder and community interactions to understand the various environmental and social parameters. A scoping workshop was conducted to understand the importance of energy efficiency in textile sector and its influence on environment, society and gender as a focus group stakeholder consultation to capture opinion and insights to be incorporated in the ESMF design.

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The project ESMF would be communicated to the community and concerned stakeholders. The roles and responsibilities of all the stakeholders would be communicated in the local language. The subsequent workshop would inform about the ESMF as well as grievance redressal mechanism. The other stakeholders would be an integral part of ESMF operationalization.

3. Environmental and Social Management Framework

Design and implementation of proposed project activities is based on adherence to both the national legislation of Government of Bangladesh and eight IFC Performance Standards. Compliance to the above will be maintained throughout the project's lifecycle. For complying with these obligations, the project beneficiary prepared this ESMF and site-specific environmental check lists and ESMPs to identify, avoid and/or minimize, mitigate or compensate potential impacts of project investments on the natural and social environment in a way consistent with both national legislation and IFC Performance Standards. No loss of or damage to private lands or assets is expected, and if the initial screening finds such an impact may occur for specific investments, their design will be modified/ alternative site will be identified that will not cause such an impact. Site-specific screening check-lists and Environmental and Social Management/ Mitigation Plans (ESMPs), based on the ESMF, will be prepared for each site where construction works will be implemented, publicly consulted and disclosed locally before procurement commences for the civil works.

3.1 Overarching policy of ESMF

The overarching policies guiding the ESMF shall be those of the Infrastructure Development Company Limited (IDCOL), the Green Climate Fund and the applicable national environmental policy/ies.

3.2 Objectives of the ESMF

An ESMF is a management tool used to assist in minimising the impact to the environment and reach a set of environmental objectives. To ensure the environmental objectives of the projects are met, this ESMF will be used to structure and control the environmental management safeguards that are required to avoid or mitigate adverse effects on the environment.

The environmental and social objectives of the project are to:

- a) Provide energy efficient solutions to the textile sector of Bangladesh to reduce energy consumption in the sector and in turn the emissions of greenhouse gases
- b) Encourage the deployment of energy efficient equipment and technology through planning, commitment and continuous improvement
- c) Comply with all applicable laws, regulations and standards for the protection of the environment and society; and
- d) Adopt the best practicable means available to prevent or minimise environmental impact.
- e) Describe all monitoring procedures required to identify impacts on the environment; and
- f) Provide an overview of the obligations of Project staff and contractors regarding environmental obligations.

3.3 General management structure and responsibilities

IDCOL will provide specialist advice on environmental issues to the contractor and for environmental monitoring and reporting. The textile factories with the assistance of the Project Management team from IDCOL, will be responsible for ensuring sound environmental performance

of the contractor in charge of construction throughout the project and ensure compliance with the ESMF.

IDCOL through the Project Management team, will be responsible for monitoring the implementation of the ESMF by relevant supervisory staff before and during financing cycle. During operations, the textile factories will be accountable for implementation of the ESMF. Contractors working on the projects have accountability for preventing or minimising environmental and social impacts. Implementation costs for the ESMF are accounted for in the detailed budget proposed and the implementation responsibility and overseeing of activities will be with IDCOL.

3.4 Anticipated environmental and social impacts (positive and negative) and mitigation measures

Through this ESMF it has been tried to identify the likely environmental and social impacts and determine suitable mitigation measures.

Project positive impacts:

Environmental: The project by its very nature has inherent environmental and climate change benefits which include:

- Improvements in energy efficiency leading to reduced consumption of energy can improve the security of energy systems across the four dimensions of risk: fuel availability (geological), accessibility (geopolitical), affordability (economic) and acceptability (environmental and social).
- Reduce greenhouse gas emissions through installation of energy efficient equipment
- Improved air quality due to reduced emissions
- Scope for better effluent treatment through installation of energy efficient ETPs
- Potential for utilities to improve their supply-side efficiency due to reduced energy demand from textile sector

Social: The project is accompanied with positive impacts on society and increased inclusion of women and addressing gender concerns which include:

- Streamlining of local and sectoral economies through increased hiring of local labour and creation of green jobs
- Raised awareness of gender equity through implementation of the project's Gender Action Plan
- Reducing manually operated machinery through deployment of EE equipment easily operable by women
- Improved production efficiency offering potential to reduce night shifts thereby encouraging women involvement
- Enhanced health and safety of labour due to ensuring of sound equipment and operational practices
- Increase energy affordability of textile factories through reduced energy bills from energy efficiency improvements

- Improved production and capacity utilization, and less operating and maintenance, which leads to enhanced productivity and competitiveness

Project negative impacts:

Key project interventions refer to the upgradation or adoption of energy efficient equipment and technology in the textile sector industries (greenfield and brownfield development) all over the country. While the environmental impact of the project will be largely positive, some adverse impacts may be generated.

Construction and installation activities for retrofitting works are those whose potential environmental impacts have limited extent, temporary and reversible, and readily managed with good construction practices. All these impacts can be effectively prevented, minimized, or mitigated by including into the work contracts specific measures to be taken by contractors under close supervision of compliance. So, these impacts will be included in the design, planning and construction supervision process, as well as during the operation of the facilities, with the objective to prevent pollution and exhaustion of natural resources. In any case, for each subproject, environmental and social checklist and ESMP will be prepared, to manage the potential impacts.

Potential adverse impacts of project implementation are mainly related to dismantling/construction works which may include:

- Increased pollution due to dismantling /construction waste (direct, short-term, and unavoidable);
- Generation of dust, noise, and vibration due to the movement of trucks and machinery (direct, short-term and unavoidable);
- Associated risks due to improper disposal of debris, asbestos and asbestos-containing materials, or minor operational or accidental spills of fuel and lubricants from the trucks and machinery (direct, short-term and avoidable);
- Slight increase in traffic during construction which may impact community (indirect, short-term and unavoidable);
- Impact on workers and community health and safety during construction activities (cumulative, short-term and avoidable);
- Improper reinstatement of construction sites upon completion of works (indirect, short-term and avoidable);
- Possible negative impacts on buildings with cultural importance (indirect, short-term and avoidable);
- Unsafe practices during operation of the building where the equipment will be installed (indirect, short-term and avoidable).

Possible impacts during operation phase of new equipment and facilities may include safety issues, air emissions due to burning of fossil fuel, production of solid waste.

3.5 Mitigation measures against IFC Performance Standards and EHS Guidelines

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IFC Performance Standards	Applicability	Mitigation measures
<p>Assessment and Management of Environmental and Social Risks & Impacts / Performance Standard 1</p>	<p>YES</p>	<ul style="list-style-type: none"> • Environmental assessment (EA) of projects proposed for financing to help ensure that they are environmentally sound and sustainable, and thus to improve decision making. • EA evaluates a project's potential environmental risks and impacts in its area of influence; examines project alternatives; identifies ways of improving project selection, siting, planning, design, and implementation by preventing, minimizing, mitigating, or compensating for adverse environmental impacts and enhancing positive impacts; and includes the process of mitigating and managing adverse environmental impacts throughout project implementation. • The EA must be undertaken based on the screening and classification of the project. • If the project is approved to operate, but it requires specific permits in accordance with the regulations, the project shall obtain such permits. • The project will be asked to consider the following matters, as part of the ESMP: 1. Organization Capacity and Competency 2. Trainings: a) Emergency situations Response and Preparedness; b) Community Engagement; and c) Monitoring, reviewing, and reporting.
<p>Labour and Working Conditions / Performance Standard 2</p>	<p>YES</p>	<ul style="list-style-type: none"> • Manage workers in line with job rights and obligations, including the rights to receive remuneration and compensation in accordance with the applicable regulations • Provide good working conditions both in terms of administration and rules of employment such as working hours, overtime, permission to leave office because of illness, childbirth as well as the protections, namely social insurance and health insurance • Safe, healthy and secure work environment for workers by considering the risks like chemical handling, equipment handling and operation. The project management should take measures for the prevention of occupational accidents. • Establish equal opportunity and justice according to the regulations of the GoB in treating workers without discriminating to gender, ethnic groups, religion, political views including in the hiring process, compensation (salaries and allowance), working conditions and type of employment, training, promotion, termination or pension and disciplinary actions. • Develop concrete plan to mitigate the adverse impact of termination on workers.

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IFC Performance Standards	Applicability	Mitigation measures
		<ul style="list-style-type: none"> • Should not employ children in for economic interests or that may harm or interfere with the education of these children or do violence to their health or physical, mental, spiritual, moral, or social developments. All workers must be at least 18 years old and must be legally employable under existing government regulations. • Industry should develop and implement a counsellor system for the workers
<p>Resource Efficiency and Pollution Prevention / Performance Standard 3</p>	<p>YES</p>	<ul style="list-style-type: none"> • The project should avoid the release of contaminants or pollutants into soil, water and air. If it is unavoidable, the project should minimize or control the intensity or the amount of released pollutants. Risk assessments need to be carried out in routine and non-routine activities, or in any activities having the potential negative impact on people and the environment by performing the measurably internal steps in operational activities in line with the principles of environmentally friendly operations. • Wherever possible, the project should minimize the Hazardous and Toxic Substances by using 1) Reduce Method or reducing the waste production, and 2) Reuse Method or reusing the waste for a beneficial process 3) Recycle Method or recycling the waste. If these are impossible to do, the project should process, destroy, and temporarily store hazardous in such ways that are environmentally friendly and in accordance with the regulations. • To overcome the adverse impact of the project on the ambient conditions, the project should record and compare the measurements of ambient conditions on a regular basis. • To minimize or reduce the release of pollutants is one of the recommended ways in maintaining the ambient conditions and this is also as a means of reducing the risk of potential changes in ambient conditions. • If there is any detected significant increase, the project should find the causes and create any necessary action plans. • The project should apply greenhouse gas mitigation actions and estimate potential GHG emission in different project cycles from pre-construction, construction and post construction as well as operational phase.

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IFC Performance Standards	Applicability	Mitigation measures
<p>Community Health, Safety, and Security / Performance Standard 4</p>	<p>YES</p>	<ul style="list-style-type: none"> • The project should evaluate the risks and the impact on the safety and health of workers and the affected community during the design, construction, commissioning and operation, of the project and develop preventive measures to overcome it in accordance with the identified risks and impacts. • The structural elements or components of the project’s design, construction, commissioning and operation should be in accordance with the applicable regulations (Buildings Rules and codes) and should consider the potential risk to the hazards, especially if the structural elements are accessible by the public or if the structural failures during the construction and operational periods can cause people’s injury. • The project management should seek to prevent incidents and accidents due to operation of the equipment and onsite movement of the same • The industry will ensure appropriate work clothes and mask to the workers <ul style="list-style-type: none"> ○ use coveralls, work boots, and a washable or disposable cap ○ use full protection mask (and not simple cotton nose mask) to avoid inhalation of hazardous furnace emissions ○ remove work clothes before eating or smoking and before leaving work ○ use a change area separate from the work area ○ provide separate work and non-work clothes ○ regular washing of working clothes • The industry will promote personal hygiene practices of workers <ul style="list-style-type: none"> ○ keep hands away from your lips and mouth ○ avoid eating or smoking in the work area ○ avoid rubbing sleeves on face ○ always wash hands and face thoroughly with soap and water before breaks ○ rinse mouth before eating or smoking ○ install separate toilet for men and women ○ Fire safety measures to be adopted; • Effluent emission, On-site contamination, Hazardous materials issues (as applicable)

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IFC Performance Standards	Applicability	Mitigation measures
		<ul style="list-style-type: none"> ○ Methane emissions from waste storage facility ○ Contamination of surface and groundwater due to disposal of anaerobic digestion effluents- pathogens, particulate matter, COD/BOD ○ Emission of nitrogen oxides, sulphur oxides, particulates, trace amounts of toxic materials, including dioxins due to biogas combustion ○ Impacts due to waste storage: odour, visual intrusion, windblown litter, attraction of flies and rodents ○ The project will also explore options for recycling the glass materials from the destroyed incandescent light bulbs and perform disposal of CFLs if applicable in accordance with Bangladesh CFL Disposal Guidelines of PowerCell. ● The project should hire employees or contractors for the provision of security personnel for the workers and property
Land Acquisition and Involuntary Resettlement / Performance Standard 5	NO	<ul style="list-style-type: none"> ● Sub projects with land acquisition resulting in involuntary resettlement will not be permitted and not eligible. ● For screening involuntary resettlement and indigenous people aspects, a well-structured questionnaire for social compliance will be followed. ● Private lands which are disputed or have encroachments on them (informal settlers, non-titled entities) will not be used for the project. ● Such instances are very rare in rural areas and no strong negative impacts are anticipated in this project.
Biodiversity Conservation and Sustainable Management of Living Natural Resources/ Performance Standard 6	NO	<ul style="list-style-type: none"> ● There is no activity envisaged under this programme that threatens biodiversity and living natural resources. ● Any activity related to the same shall not be permitted.
Indigenous Peoples (IPs) / Performance Standard 7	NO	<ul style="list-style-type: none"> ● The project should identify all indigenous peoples and local communities who may be affected within the project area, as well as the nature and levels of estimated social, cultural and environmental impact on them and prevent negative impacts as best as possible. Any activity detrimentally impacting IP shall not be permitted.

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IFC Performance Standards	Applicability	Mitigation measures
		<ul style="list-style-type: none">• If the prevention seems impossible, the project management should minimize, mitigate, or compensate for these impacts in accordance with existing local culture wisdom.• No negative impacts are anticipated towards IPs in this project
Cultural Heritage / Performance Standard 8	NO	<ul style="list-style-type: none">• PS8 defines cultural heritage including both tangible objects and sites, and intangible forms of culture.• Under this project, no intervention in the heritage sites is envisaged and shall not be permitted.

EHS Guidelines

To ensure E & S considerations are carefully identified and mainstreamed in all the sub-projects of the Program, the IFC EHS Guidelines will be adopted. These guidelines will be adopted as part of the design and implementation of the ESMPs, as well as other applicable E & S risk management tools for all sub-projects considered under the Program. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable at reasonable cost by commercially available technology. The discharged effluent, air emissions, and other numerical guidelines and performance indicators, as well as other prevention and control approaches included in the EHS Guidelines, are default values applicable to new projects, though the application of alternative performance levels and measures may be considered. The General EHS Guidelines include guidance on a comprehensive range of environmental, occupational health and safety, community health and safety and construction and decommissioning topics. They should be used in parallel with the accompanying Industry Sector EHS Guidelines. The areas of General EHS Guidelines are summarized in the Table below.

Table 2: Summary of WBG/IFC General EHS Guidelines

1	Environmental	2	Occupational Health and Safety
1.1	Air Emissions and Ambient Air Quality	2.1	General Facility Design and Operation
1.2	Energy Conservation	2.2	Communication and Training
1.3	Wastewater and Ambient Water Quality	2.3	Physical Hazards
1.4	Water Conservation	2.4	Chemical Hazards
1.5	Hazardous Waste Management	2.5	Biological Hazards
1.6	Waste Management	2.6	Radiological Hazards
1.7	Noise	2.7	Personal Protective Equipment (PPE)
1.8	Contaminated Land	2.8	Special Hazard Environments
		2.9	Monitoring
3	Community Health and Safety	4	Construction and Decommissioning
3.1	Water Quality and Availability	4.1	Environment
3.2	Structural Safety of Project Infrastructure	4.2	Occupational Health & Safety
3.3	Life and Fire Safety (L&FS)	4.3	Community Health & Safety
3.4	Traffic Safety		
3.5	Transport of Hazardous Materials		
3.6	Disease Prevention		
3.7	Emergency Preparedness and Response		

Source: IFC/WBG (2007). Environmental, Health, and Safety General Guidelines. 30 April 2007. Available at <https://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final++General+EHS+Guidelines.pdf?MOD=AJPERES> [Accessed 02/12/18]

The detailed mitigation measures which can be taken up by industry to adhere to the ESMF are provided in Annex 1 and Annex 3.

Gender equality and social inclusion

Mainstreaming gender equity and empowerment is already a focus area in the project. In the sub projects, activities related to livelihood restoration will address women's needs. A Gender Assessment Report and Action Plan is being designed under the project which will help analyse gender issues during the preparation stage of sub project and design interventions. At the sub project level, gender analysis will be part of the social assessment and the analysis will be based on findings from gender specific queries during primary data collection process and available secondary data. The quantitative and qualitative analysis will bring out sex disaggregated data and issues related to gender disparity, needs, constraints, and priorities; as well as understanding whether there is a potential for gender based inequitable risks, benefits and opportunities. Based on the analysis, the specific interventions will be designed and if required gender action plan will be prepared. The overall monitoring framework of the project will include sex disaggregated indicator and gender relevant indicator.

The participation of beneficiaries and focus on poverty reduction are two other key determinants of the effectiveness and sustainability of any project. Any project must address the constraints on women's participation in project design, construction, and monitoring and evaluation (M&E). The project must also focus on the linkage between gender and poverty, by identifying, for example, households headed by females and those households' special needs.

The project designs should be gender responsive based on the gender analysis and should be included in the ESIA document. The findings and recommendations from the gender analysis during project planning and feedback from beneficiaries during implementation must be discussed thoroughly to determine the need for further action. Listed below are the key action points:

General Check list for evaluating gender and social aspects

- Identify key gender and women's participation issues.
- Identify the role of gender in the project objectives.
- Prepare terms of reference (TOR) for the gender specialist or social development specialist of the client
- Conduct gender analysis as part of overall Social Assessment.
- Draw up a socioeconomic profile of key stakeholder groups in the target population and disaggregate data by gender.
- Examine gender differences in knowledge, attitudes, practices, roles, status, wellbeing, constraints, needs, and priorities, and the factors that affect those differences.
- Assess men's and women's capacity to participate and the factors affecting that capacity.
- Assess the potential gender-differentiated impact of the project and options to maximize benefits and minimize adverse effects.
- Identify government agencies and nongovernmental organizations (NGOs), community-based organizations (CBOs), and women's groups that can be used during project implementation. Assess their capacity.
- Review the gender related policies and laws, as necessary.
- Identify information gaps related to the above issues.
- Involve men and women in project design.
- Incorporate gender findings in the project design.

- Ensure that gender concerns are addressed in the relevant sections (including project objectives, scope, poverty and social measures, cost estimates, institutional arrangements, social appendix, and consultant's TOR for implementation and M & E support).
- List out major gender actions.
- Develop gender-disaggregated indicators and monitoring plan.

3.5 Institutional Requirements for ESMF – Stakeholder roles and responsibilities

As the energy efficiency projects will be partially funded by the Green Climate Fund through IDCOL, all works (including but not limited to civil and construction contractors) must adhere to the ESMF, including complying with the appropriate avoidance and mitigation measures. The ESMF will be assessed for each project by the IDCOL prior to any works being undertaken. The ESMF identifies potential risks to the environment and social matters from the projects and outlines strategies for managing those risks and minimising undesirable environmental and social impacts.

IDCOL will be responsible for the monitoring of the ESMF. The supervising engineer will ensure timely remedial actions are taken by the contractor where necessary.

Site Supervisor

The site supervisor, where applicable, is responsible for ensuring compliance with the ESMF. The site supervisor will provide advice on effective environmental management of the project to the textile factories, IDCOL and engineers and all construction site personnel. The site supervisor is to also ensure the environmental awareness of project personnel is maintained through appropriate training. An independent review of the compliance may be undertaken during construction and post-construction where deemed necessary.

Environmental Procedures and Site and Activity-Specific Work Plans/Instructions

Environmental procedures provide a written method describing how the management objectives for environmental elements are to be obtained. They contain the necessary detail to be site- or activity-specific and are required to be followed for all construction works. Site and activity-specific work plans, and instructions are to be issued through the following methods:

Environmental and Incident Reporting

Any incidents, including non-conformance with the procedures of the ESMF, are to be recorded using an Incident Record and the details entered in the register. For any incident that causes or has the potential to cause material or serious environmental harm, the site supervisor shall notify the nodal department, Department of Environment (DoE) as soon as possible. The contractor must cease work until remediation has been completed as per the approval of Department of Environment.

Daily and Weekly Environmental Inspection Checklists

A daily environmental checklist is to be completed at each work site by the relevant site supervisor and maintained within a register. A weekly environmental checklist is to be completed and will include reference to any issues identified in the daily checklists completed by the Site Supervisors.

Corrective Actions

Any non-conformances with the ESMF are to be noted in weekly environmental inspections and logged into the register. Depending on the severity of the non-conformance, the site supervisor may specify a corrective action on the weekly site inspection report. The progress of all corrective actions will be tracked using the register.

Complaints Register

A complaints register will be established to record any concerns raised by the community during construction. The complaint will be investigated and following the investigation, if it relates to a significant incident, the matter will be referred to IDCOL for commentary and/or advice.

Grievance redressal mechanism

The project proponent shall constitute a three-member Grievance Redress Committee (GRC) comprising of an officer representing the project proponent, not below the rank of the implementing officer, the elected member (local body) of the project area/location and one member from the public who is known to be a person of integrity, good judgment and commands respect among the community. The existence of the GRC will be disseminated to the affected persons through printed handouts providing details of the structure and process in redressing grievances.

Review and Auditing

The ESMF and its procedures are to be reviewed at least every two months by IDCOL staff. The objective of the review is to update the document to reflect knowledge gained during construction operations and to reflect new knowledge and changed community standards (values). Any changes are to be developed and implemented in consultation with UNDP Staff. When an update is made, all site personnel are to be made aware of the revision immediately through a toolbox meeting.

A publicised telephone number will be maintained by the Project Management team throughout the project to serve as a point of contact for enquiries, concerns and complaints. All enquiries, concern and complaints will be recorded on a register and the appropriate manager will be informed.

Where there is a community issue raised, the following information will be recorded:

- Time, date and nature of enquiry, complaint or concern;
- Type of communication (e.g. telephone, letter, personal contact);
- Name, contact address and contact number;
- Response and investigation undertaken because of the enquiry, complaint or concern; and
- Actions taken and name of the person acting.

Some enquiries, complaints and concerns may require an extended period to address. The complainant(s) will be kept informed of progress towards rectifying the concern. All enquiries, complaints and concerns will be investigated, and a response given to the complainant in a timely manner. Contractors and textile factories will be required to nominate a staff will be responsible for undertaking a review of all enquiries, complaints and concerns and ensuring progress toward resolution of each matter.

Training of Contractors

- The main contractor has the responsibility for ensuring systems are in place so that relevant employees, contractors and sub-contractors are aware of the environmental and social requirements for construction, including the ESMF.
- All construction personnel will attend an induction which covers health, safety, environment and cultural requirements.

Administration

- The Project Management team will be responsible for the revision or updates of this document during the course of work. It is the responsibility of the person to whom the document is issued to ensure it is updated.
- The site supervisor will be responsible for daily environmental inspections of the construction site.
- The contractor will maintain and keep all administrative and environmental records which would include a log of complaints together with records of any measures taken to mitigate the cause of the complaints.
- The contractor will be responsible for the day to day compliance of the ESMF.
- The Supervising Engineer/Project Manager will supervise the contractor.

Public consultation

The Environmental and Social Management Framework will be published on the website of IDCOL during the period of (no. of days) days from (date). Through this link, interested parties may send comments, suggestions and criticisms regarding the evaluation of environmental and social impacts and proposed risk minimization measures, adverse impact mitigation and enhanced benefits of the Project.

The safeguard instruments for sub-projects /sub-activities must comply with the AE's and GCF's Information Disclosure Policy as well as the requirements of the GCF Environmental and Social Policy on disclosure of subprojects, which indicates that: in the case of Category B subprojects, the ESIA and an Environmental and Social Management Plan (ESMP) will be disclosed prior at least 30 days in advance of the approval. The safeguard reports will be available in both English and Bangla languages. The reports will be submitted to GCF and made available to GCF via electronic links in both the AE and the GCF's website as well as in locations convenient to affected peoples in consonance with requirements of GCF Information Disclosure Policy and Section 7.1 of (Information Disclosure) of GCF Environmental and Social Policy.

Comments, suggestions and criticism received will be recorded, analysed and incorporated into the Environmental and Social Management Framework as appropriate. A Summary Report of the consultation process along-with stakeholder engagement plan will be attached to the final version of the Funding Proposal as Annex 7.

3.6 Key Risks associated with Social and Environmental aspects, identified at Programme Preparation Stage

Selected Risk factor 1		
Category	Probability	Impact
Technical and operational	Low	Medium
Description		
Safety risks like accidents, injuries and incidents of fire and other occupational damages to equipment and employees.		
Mitigation Measure(s)		
<p>It's mandated to ensure compliance with project ESIA which provides for requisite avoidance, mitigation and compensation measures; National Laws and Policies ⁸ and register with Accord on Fire and Building Safety in Bangladesh (Accord)/ the Alliance for Bangladesh Worker Safety (Alliance)/ the National Action Plan on Fire Safety and Structural Integrity (NAP) or any other regulatory requirement set by the Government as and when required.</p> <p>Synchronization with these will significantly reduce risks of accidents, injuries and incidents of fire and other occupational damages.</p> <p>Compliance with Regulatory Standards of the Ministry of Labour and Employment & IDCOL EHS policies and guidelines & clear contractual rules covering the need for occupational health and safety technical activities will be monitored.</p>		
Selected Risk Factor 2		
Category	Probability	Impact
Other	Low	Medium
Description		
Risks from lack of awareness and knowledge about the benefits of energy efficiency in textile sector and availability of the financial instrument for the same.		
Mitigation Measure(s)		
<p>Under the technical assistance component of the program, IDCOL will arrange a number of national stakeholder engagement events to raise awareness about EE in textile and availability of a funding in this regard.</p> <p>The knowledge gap will be addressed through development of knowledge products, marketing material, workshops, and outreach programs to reduce and mitigate risks associated with lack of awareness about the existence and function of the financial facility.</p>		
Selected Risk Factor 3		
Category	Probability	Impact
Other	Medium	Low
Description		
Social risks like exclusion of social groups and indigenous communities from skill up gradation, trainings, workshops and job opportunities from new equipment and machinery.		
Mitigation Measure(s)		
Compliance with the Social regulatory frameworks in Bangladesh, IDCOL's ESSF, GCF's guidelines and the ESIA would ensure none of the listed social risk to occur at any given time.		

⁸ Environment Conservation Act (ECA) 1995; Environment Conservation Rules (ECR) 1997; Environment Court Act (ECA) 2010

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Selected Risk Factor 4		
Category	Probability	Impact
Other	Low	Medium
Description		
Gender risks from lack of gender equity in trainings and skill up gradation required for integration of new equipment and machinery.		
Mitigation Measure(s)		
Gender Inclusiveness and equity will be promoted throughout project implementation. The project participants to comply with the National policies like Labour Act and Labour Rules, Women development policy 2011 and GCF's Gender policy to ensure reduction and mitigation of gender risks. Compliance with Gender Action Plan of this program will ensure the participation of women in such capacity building initiatives.		
Selected Risk Factor 5		
Category	Probability	Impact
Other	Medium	Low
Description		
Environment risks caused due to inadequate disposal of solid and liquid generated industrial plant modernization processes.		
Mitigation Measure(s)		
The ESIA identifies and analyses upstream environmental issues that may affect the project and the sector and suggests mitigation measures for the same. It also consists of an appropriate management plan for implementing, monitoring and reporting of the suggested environmental mitigation and enhancement measures. Pre-identification of environmental risks through ESIA would prepare to reduce the occurrence and intensity of these risks. It essential to comply with the ESIA as it conforms to the national regulations and IDCOL guidelines.		
Selected Risk Factor 6		
Category	Probability	Impact
Other	Low	Low
Description		
Health Risks from Respiratory & Dermal contact with hazards causing risk of lung cancer and injury to the bronchial tubes, dust particles, VOCs, heat and chemicals occurring from the processes in textile units		
Mitigation Measure(s)		
Health risks are low level and have low probability to occur. Separate mitigation will not be required as this risk is already reduced due to the implementation of Energy Efficient equipment that are certified, user and environment friendly as compared to the existing equipment. The end-users will have to ensure that the equipment and its installation is compliant with programme's ESIA and conforms to the national regulations and IDCOL guidelines.		

ANNEX 1: SAMPLE ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

An Environmental & Social Management Plan (ESMP) is the key document focused on implementation, after the potential impacts have been identified. It ensures that the project impacts are reduced to an acceptable level during implementation of the sub-project. Thus, ESMP becomes the document for ensuring that all the preceding analysis is used to preserve/improve overall environmental quality within the influence area of the project. The ESMP should be sub-project specific, clearly and concisely describing adverse impacts, selected management measures to bring it to an acceptable level and timelines for implementing these measures. It should also clarify roles and responsibilities among the various stakeholders. The building blocks of an ESMP are:

- I. Potential adverse impacts identified and mitigation measures to be adopted, together with conditions within which one or other measure would apply and their integration with phases – Pre-construction, Construction/ Implementation and Operation
- II. Enhancement plans for positive impacts
- III. Monitoring Plan with indicators, mechanisms, frequency, locations
- IV. Budgetary allocations for all the above activities.
- V. Institutional arrangements for each activity and mitigation measures
- VI. Implementation schedules for each activity and its integration with the sub-project implementation timelines.
- VII. Reporting procedures, including for redressing grievances related to environmental and social issues.

A summary of the likely issues and potential impacts & mitigation measures is presented in the following sections to guide preparation of upcoming ESMPs as more sub-projects get identified. The generic ESMP is only a guideline document and would require addressing the sub-project anticipated impacts & proposing mitigation measures.

Reporting Frequency: bi-annually (6 months)

Table 3: Sample ESMP for the project

Issue	Control Activity (and Source)	Action Timing	Responsibility
Increased noise levels	Select equipment and specific design work practices to ensure that noise emissions are minimised during equipment installation and any associated construction	All phases	Contractor
	Specific noise reduction devices such as silencers shall be installed as appropriate to site plant and equipment.	Pre and during construction	Contractor
	Minimise the need for and limit the emissions as far as practicable if noise generating construction works are to be carried out outside of the hours: 7am-5pm (Mon - Fri).	Construction phase	All Personnel
	All incidents complaints and non-compliances related to noise shall be reported in accordance with the site incident reporting procedures and summarised in the register.	Construction phase, operation phase	Site Supervisor
	The contractor should conduct employee and operator training to improve awareness	Pre and during construction,	Contractor

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Issue	Control Activity (and Source)	Action Timing	Responsibility
	of the need to minimise excessive noise in work practices through implementation of measures.	operation phase	
Vibration due to construction and running of equipment	Identify properties, structures and habitat locations that will be sensitive to vibration impacts resulting from construction and operation of the projects.	Pre and during construction, operation phase	Contractor
	Design to give due regard to temporary and permanent mitigation measures for noise and vibration from construction and operational vibration impacts.	Pre-construction, operation phase	Contractor
	All incidents, complaints and non-compliances related to vibration shall be reported in accordance with the site incident reporting procedures and summarised in the register	Construction phase, operation phase	Site Supervisor
	During construction, standard measure shall be taken to locate and protect underground services from construction and operational vibration impacts	Construction phase	Site Supervisor
Increase in dust levels at sensitive locations	Implement effective dust management measures in all areas during design, construction and operation.	Pre and during construction, operation phase	All Personnel
	Install dust gauges at locations identified for construction lay down and stockpiling within the project footprints.	During construction	Site Supervisor
	Manage dust/particulate matter generating activities to ensure that emissions do not cause an environmental nuisance at any sensitive locations	During construction, operation phase	Site Supervisor
	Construction activities should minimise risks associated with climatic events.	During construction	Site Supervisor
	Implement scheduling/staging of proposed works to ensure major vegetation disturbance and earthworks are minimised.	Entire construction	Contractor
	Ensure that materials to be stockpiled onsite are not ordered and/or purchased until they are required for works.	Entire construction	Contractor
	Rubbish skips and receptacles should be covered and located as far as practicable from sensitive locations.	During construction	Site Supervisor
Increase in vehicle emissions (including odours and fumes)	Ensure construction vehicles are switched off when not in use.	During construction	Site Supervisor
	Ensure all construction vehicles, plant and machinery are maintained and operated in accordance with design standards and specifications.	During construction, operation phase	Site Supervisor

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Issue	Control Activity (and Source)	Action Timing	Responsibility
	Develop and implement an induction program for all site personnel, which includes as a minimum an outline of the minimum requirements for environmental management relating to the site.	Pre and during construction, operation phase	Contractor
	Rubbish skips and receptacles should be covered and located as far as practicable from sensitive locations.	During construction, operation phase	Site Supervisor
Production of wastes and excessive use of resources	Preference shall be given to materials that can be used to construct the project that would reduce the direct and indirect waste generated.	Pre and during construction	Contractor
	The use of construction materials shall be optimised and where possible a recycling policy adopted.	During construction	Site Supervisor
	Any waste shall be disposed of at an approved landfill.	During construction, operation phase	Site Supervisor
	Recyclable waste (including oil and some construction waste) shall be collected separately and disposed of correctly.	During construction, operation phase	Site Supervisor
	Waste sites shall be sufficiently covered daily to ensure that wildlife does not have access.	During construction	Site Supervisor
	Disposal of waste shall be carried out in accordance with the Government of Bangladesh requirements.	During construction	Site Supervisor
	Fuel and lubricant leakages from vehicles and plant shall be immediately rectified.	During construction, operation phase	Site Supervisor
Production of wastes and excessive use of resources	Major maintenance and repairs shall be carried out off-site whenever practicable.	During construction	Site Supervisor
	Remnants of concrete shall not be left at any location along the corridor.	During Construction	Site Supervisor
	On-site storage of fuel and chemicals shall be kept to a minimum.	During Construction, operation phase	Contractor
	Any waste oils and lubricants are to be collected and transported to recyclers or designated disposal sites as soon as possible.	During Construction, operation phase	Site Supervisor
	Any dangerous goods stored on site shall be stored in accordance with GoB regulations.	During Construction, operation phase	Contractor

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Issue	Control Activity (and Source)	Action Timing	Responsibility
Loss of land / and other physical assets	Carrying out analysis of alternatives to avoid/minimize involuntary taking of land and other physical assets	Pre-construction	Client
	Compensation at replacement value	Pre-construction	Client
Loss of livelihood	Preferable employment with developer	Pre-construction	Client/ project developer
	Alternative livelihood options and training for skill enhancement	Pre-construction	Client/ project developer
	Corporate Social Responsibility (CSR) activities to be undertaken by project developer will ensure alternative livelihood opportunities	Pre-construction	Client/ project developer
Loss of access rights	Project to ensure thorough analysis of alternatives that access enjoyed by the community remains intact.	Pre-construction	Client
	In case of unavoidable circumstances, alternative access will be provided.	Pre-construction	Client
Soil Erosion; Alteration of natural drainage;	Construction facilities to be placed 500 meters from water bodies, natural flow paths;	Site preparation	Client/ project developer
	Minimize cut & fill operations, the site clearing, and grubbing operations should be limited to specific locations only.	Site preparation	Client/ project developer
	Any disruption of socially sensitive areas with regard to human habitation and areas of cultural significance will be avoided.	Site preparation	Client/ project developer
	The existing slope and natural drainage pattern on the site should not be altered.	Site preparation	Client/ project developer
	Trees on private lands are felled or damaged during construction operations, compensation shall be paid to the owner as determined by the forest/horticulture departments.	Site preparation	Client/ project developer
	The contractor shall ensure that site preparation activities do not lead to disruption of activities of the local residents.	Site preparation	Client/ project developer
Conflicts with existing users due to the scarcity of resource base.	A detailed assessment of the available resources and consent of the local representative for withdrawal of water from existing surface water sources shall be taken.	During construction	Client/ project developer
	If ground water is withdrawn, adequate approvals from the appropriate department need to be undertaken before setting up bore wells.	During construction	Client/ project developer
Road safety and traffic management	The movement of heavy machinery and equipment's shall be restricted to defined routes.	Pre and During construction	Client/ project developer
	Proper signages to be displayed at major junctions.	Pre and During construction,	Client/ project developer

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Issue	Control Activity (and Source)	Action Timing	Responsibility
		operation phase	
	The vehicular movement to be controlled near sensitive locations viz. schools, colleges, hospitals identified along designated vehicular transportation routes.	Pre and During construction, operation phase	Client/ project developer
	Road diversions and closures to be informed well in advance to the local residents.	Pre and During construction	Client/ project developer
Conflicts with the local residents	In case of new construction, alternate arrangement for fuel wood, heating and cooking should be made to meet fuel wood requirement of the labour	Base camp construction for labour	Client/ project developer
	Work force should be prohibited from disturbing the flora, fauna including hunting of animals, Wildlife hunting, poaching and tree felling.	Base camp construction for labour	Client/ project developer
	Adequate facilities ensuring sanitation for labour camps.	Base camp construction for labour	Client/ project developer
	Treated Water will be made available at Site for Labour drinking purpose.	Base camp construction for labour	Client/ project developer
	Adequate accommodation arrangements for labour	Base camp construction for labour	Client/ project developer
Health and safety risks	All construction equipment used for the execution of the project works shall be fit for purpose and carry valid inspection certificates and insurance requirements.	Pre and During construction	Client/ project developer
	The risk assessment shall be prepared and communicated prior to the commencement of work for all types of work activities on site.	Pre and During construction	Client/ project developer
	Provide walkways that are clearly designated as a walkway; all walkways shall be provided with good conditions underfoot; signposted and with adequate lighting.	Pre and During construction, operation phase	Client/ project developer
	Signpost any slippery areas, ensure proper footwear with a good grip is worn for personnel working within slippery areas.	Pre and During construction, operation phase	Client/ project developer
	Carry out fire risk assessment for the construction areas, identify sources of fuel and ignition and establish general fire precautions including, means of escape, warning, and fighting fire.	Pre and During construction, operation phase	Client/ project developer
	Set up a system to alert workers on site. This may be temporary or permanent mains operated fire alarm.	Pre and During construction, operation phase	Client/ project developer

Issue	Control Activity (and Source)	Action Timing	Responsibility
	Fire extinguishers should be located at identified fire points around the site. The extinguishers shall be appropriate to the nature of the potential fire.	Pre and During construction, operation phase	Client/ project developer
	Establish and communicate emergency response plan (ERP) with all parties, the ERP to consider such things as specific foreseeable emergency situations, organizational roles and authorities, responsibilities and expertise, emergency response and evacuation procedure, in addition to training for personnel and drills to test the plan	Pre and During construction, operation phase	Client/ project developer
	Electrical equipment must be safe and properly maintained; works shall not be carried out on live systems.	Pre and During construction, operation phase	Client/ project developer
	Only competent authorized persons shall carry out maintenance on electrical equipment, adequate Personal Protective Equipment (PPE) for electrical works must be provided to all personnel involved in the tasks.	Pre and During construction, operation phase	Client/ project developer
	An adequate number of staff and first aiders shall be on site in accordance with Bangladesh Labour Law requirements.	Pre and During construction, operation phase	Client/ project developer
	First aid kit with adhesive bandages, antibiotic ointment, antiseptic wipes, aspirin, non-latex gloves, scissors, thermometer, etc. shall be made available by the contractor on site.	Pre and During construction, operation phase	Client/ project developer
	Emergency evacuation response shall be prepared by the contractor and relevant staff shall be trained through mock-up drills.	Pre and During construction, operation phase	Client/ project developer
	Ensure all equipment is suitable for jobs (safety, size, power, efficiency, ergonomics, cost, user acceptability etc.), provide the lowest vibration tools that are suitable and can do the works.	Pre and During construction, operation phase	Client/ project developer
	Ensure all tools and other work equipment are serviced and maintained in accordance with maintenance schedules and manufacturer's instructions.	Pre and During construction, operation phase	Client/ project developer

An ESMP document should include:

- 1) Lists of all project related activities and impacts, for each stage of the development of Projects, i.e., for the design, construction and maintenance stages
- 2) A list of regulatory agencies involved and their responsibilities

- 3) Specific remedial and monitoring measures proposed for each stage
- 4) A clear reporting schedule, including discussion of what to submit, to whom, and when
- 5) Cost estimates and sources of funding for both one-off costs and recurring expenses for implementation of the EMPs.

ESMP shall deal with the construction and operations stage of the project. The extent and timing of mitigation actions should be based on the significance of the predicted impacts. Some mitigation measures can be incorporated into the design of the project and can largely resolve the potential impacts of a project, e.g., drainage, access roads. Other measures require an ongoing implementation plan to ensure that proposed actions are carried out at the correct times, that environmental measures such as slope protection are maintained, and that prompt remedial actions are taken when the initial measures are not fully effective.

ANNEX 2: SAMPLE TERMS OF REFERENCE (TOR) FOR CONDUCTING ESIA

Environment and Social Impact Assessment (ESIA) is a decision support mechanism to ensure that the project design and implementation are environmentally sound and sustainable. During the preparation phase, the objective of the ESIA is to provide inputs to the selection of subprojects, feasibility study; preliminary and detailed design as well as assist development of a holistic development of the project package. During the implementation phase, environmental management plans (developed as a part of the ESIA during the preparation phase) are to be used for executing the environmental mitigation, enhancement, and monitoring measures.

Objectives of ESIA

In the preparation phase, the ESIA shall achieve the following objectives:

- Identify and analyse upstream environmental issues that may affect the project and the sector.
- Establish the environmental and social baseline in the study area, and identify any significant environmental, social, health and safety issues (direct/indirect/induced/cumulative).
- Assess impacts of the project and provide for measures to address the adverse impacts by the provision of the requisite avoidance, mitigation and compensation measures.
- Integrate the environmental issues in the project planning and design; and
- Develop appropriate management plans for implementing, monitoring and reporting of the suggested environmental mitigation and enhancement measures.

The ESIA studies and reporting requirements to be undertaken under these TOR must conform to the GoB regulations and IDCOL guidelines.

Description of the Project

Include a description of the project; covering geographical location, type of development envisaged, including a description of project activities. Also include the status of the project. Provide brief information on any other study already completed/ongoing or proposed) to be added by Client.

Scope of Work

The ESIA comprises the following 3 components: (i) Environmental screening / Inception Report for the entire project; (ii) Environmental and Social Impact Assessment (ESIA) for the individual project/subprojects, as required; and (c) Environmental and Social Management Plans (ESMPs) for the individual project/sub-projects.

The following section gives the detailed scope of work in each of these stages.

Inception

The Consultants shall use the inception period to familiarize with the project details. The Consultants shall recognize that the remaining aspects of the project, such as engineering and social, would be studied in parallel, and it is important for all these aspects are integrated into the final project design to facilitate their successful project implementation. The Consultants should also recognize that due care and diligence planned during the inception stage helps in improving the timing and quality of the ESIA reports.

During the inception period the Consultants shall: (a) study the project information to appreciate the context within which the ESIA must be carried out; (b) identify the sources of secondary information on the project, on similar projects and in the project area; (c) carry out a reconnaissance survey and (d) undertake preliminary consultations with selected stakeholders.

Following the site visits and stakeholder consultations, as well as a review of the conditions of the contract with the Client, the consultant shall analyse the adequacy of the allocated manpower, time and budget and shall clearly bring out deviations, if any. The Consultant shall study the various available surveys, techniques, models, and software to determine what would be the most appropriate in the context of this project.

The Consultant shall interact with the engineering and social consultants to determine how the ESIA work fits into the overall project preparation cycle; how overlapping areas are to be jointly addressed; and to appropriately plan the timing of the deliverables of the ESIA process. These shall be succinctly documented in the Inception Report.

Environmental Screening

Consultants shall summarize the potential environmental impacts. During such categorization, consideration shall be paid to (i) location of the project with respect to environmentally sensitive areas; and (ii) volume, nature, and technology of construction. The screening parameters should be such that their identification and measurement is easy and does not involve detailed studies.

Environmental Scoping

Based on the result of the environmental screening exercise, consultants shall suggest the scope of Environmental and Social Impact Assessment to be undertaken. It shall include a listing of other environmental issues that do not deserve a detailed examination in the project ESIA (covering, for example, induced impacts that may be outside the purview of the client) along with a justification. The scoping needs to identify and describe the specific deviations of the EA TOR provided, if any, along with a justification; modify this TOR for the project ESIA, if required; and recommend studies that need to be conducted in parallel but are outside the ESIA process.

- i. **Baseline:** All regionally or nationally recognized environmental resources and features within the project's influence area shall be clearly identified and studied in relation to activities proposed under the project. These will include all protected areas (such as national parks, wildlife sanctuaries, reserved forests, biosphere reserves, wilderness zones), unprotected and community forests and forest patches, wetlands of local/regional importance not yet notified, rivers, rivulets and other surface water bodies and sensitive environmental features such as wildlife corridors, biodiversity hotspots, meandering rivers, flood prone areas, areas of severe river erosion, flood embankments (some of which are also used as roads). Consultants shall consolidate all this information in a map of adequate scale.
- ii. **Stakeholder Identification and Consultation:** Consultation with the stakeholders shall be used to improve the plan and design of the project rather than merely having project information dissemination sessions. The consultants shall carry out consultations with Experts, NGOs, concerned Government Agencies and other stakeholders to (a) collect baseline information; (b) obtain a better understanding of the potential impacts; (c) appreciate the perspectives/concerns of the stakeholders; and (d) secure their active involvement during subsequent stages of the project.

Consultations shall be preceded by a systematic stakeholder analysis, which would: (a) identify the individual or stakeholder groups relevant to the project and to environmental issues; (b) include expert opinion and inputs; (c) determine the nature and scope of consultation with each type of stakeholders; and (d) determine the tools to be used in contacting and consulting each type of stakeholder group. A systematic consultation plan with attendant schedules will be prepared for subsequent stages of project preparation as well as implementation and operation, as required.

- iii. **Identification of Relevant Macro/Regional Level Environmental Issues:** Consultants shall determine the Valued Environment Components (VECs) considering the baseline information (from both secondary and primary sources), the preliminary understanding of the activities proposed in the project and, most importantly, the stakeholder (and expert) consultations, which would need to be carefully documented.

Based on the identification of VECs, consultants shall identify information gaps to be filled, and conduct additional baseline surveys, including primary surveys. The consultants shall conduct a preliminary analysis of the nature, scale, and magnitude of the impacts that the project is likely to cause on the environment, especially on the identified VECs, and classify the same using established methods. For the negative impacts identified, alternative mitigation/management options shall be examined, and the most appropriate strategy/technique should be suggested. The preliminary assessment should clearly identify aspects where the consultants shall also analyse indirect and cumulative impacts of all phases and activities of the project. For the positive measures identified, alternative and preferred enhancement measures shall be proposed.

- iv. **Environmental Assessment:** The Consultants shall undertake necessary impact analysis based on primary and secondary information and outputs from the stakeholder consultation process. In the cases of very significant environmental losses or benefits, the consultants shall estimate the economic/financial costs of environmental damage and the economic/ financial benefits the project is likely to cause. In the cases, the impacts or benefits are not too significant, qualitative methods could be used. In addition, wherever economic and financial costs of the environmental impacts cannot be satisfactorily estimated, or in the cases of significant irreversible environmental impacts, the consultants shall make recommendations to avoid generating such impacts.
- v. **Environmental and Social Management Plan:** The consultants shall prepare an ESMP to address identified planning, design, construction, and operation stage issues. For each issue, the consultants shall prepare a menu of alternative avoidance, mitigation, compensation, enhancement and/or mitigation measures, as required/necessary. Consultants shall provide robust estimates of costs for environmental management measures. These costs shall be verified for common works items in line with the rate analysis for other works. The consultants shall organize consultations with line departments and will finalize the ESMP.
- vi. **Environmental Inputs to Feasibility Study and Preliminary Project Design:** The ESIA consultants shall make design recommendations, related to alignment, cross-sections, construction material use, mitigation and enhancement measures. The ESIA consultants shall interact regularly with the Client and familiarize themselves with the project's overall feasibility

analyses models so that the ESIA inputs are in conformity to the needs of the overall feasibility study.

- vii. **Capacity Building Preparation:** Based on the preliminary findings of the environmental screening, stakeholder consultations, and analysis of the project sponsor’s capacity to manage environmental issues, the consultants shall prepare a Capacity Building Plan (including the requirement of additional technical staff and facilities) to ensure effective implementation of the ESMP. Earmarking staff for environmental and social management and improving their skill-sets would be simultaneously pursued during project preparation and implementation.

The consultants shall interact regularly with the project sponsor throughout project preparation to ensure that the knowledge, skills, and perspectives gained during the ESIA assignment are transferred to the sponsor and are utilized effectively during project implementation (if required).

- viii. **Coordination among Engineering, Social, Environment, and Other Studies:** The consultants, with assistance from the project sponsor, shall establish a strong coordination with the other project-preparation studies – engineering, social and/or institutional development. The consultants shall keep in mind the specific requirements of the project in general, and the engineering/design studies in particular, and shall plan their outputs accordingly. It is recommended that some of the consultation sessions may be organized in coordination with the social and engineering consultants, as feasible, and when the stakeholders consulted are the same.

The consultant shall review the contract documents – technical specifications, and rate analysis, to ensure that there are minimal conflicts between the ESMP stipulations and specifications governing the execution of works under the project.

- ix. **Public Disclosure:** The consultants shall prepare a non-technical ESA summary report for public disclosure and will provide support to the project sponsor in meeting the disclosure requirements, which at the minimum shall meet the financial partners on Public Disclosure.
- x. **Consultant’s Inputs:** The Consultants are free to employ resources as they see fit. Additional expertise shall be provided as demanded by the context of the project. The consultants are encouraged to visit the project area and familiarize themselves, at their own cost, before submitting the proposal; and propose an adequate number and skill-set for the senior specialists and technical support staff for the ESIA assignment. Further, the consultant will allocate an adequate number of field surveyors, distinct from the technical support staff, to complete the study in time. Timing is an important essence for any ESIA study, which shall be closely coordinated with the works of the engineering and social teams, simultaneously involved in the preparation of the project.

The consultants shall provide for all tools, models, software, hardware, and supplies, as required to complete the assignment satisfactorily. These should be widely recognized or accepted. Any new model or tool or software employed should be field-tested before use or the purpose of this ESIA.

Consultant’s Outputs: The consultant is expected to provide the outputs, as per the schedule is given in the ToR. The Consultants are expected to allocate resources, such as for surveys, keeping this output schedule in mind.

ANNEX 3: BEST PRACTICES CHECKLIST

Table 4: Presentation of activity wise good practices

ACTIVITY	PARAMETER	GOOD PRACTICES CHECKLIST
<p>A. General Conditions</p>	<p>Notification and Object Users Safety</p>	<p>The public has been notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works).</p>
		<p>All work will be carried out in a safe and disciplined manner designed to minimize impacts on neighbouring residents and environment.</p>
		<p>The work dynamics for all phases is agreed with the management.</p>
		<p>The employees have been informed with nature of works, works dynamics and safety measures during work implementation. With physical measures the access to the construction site will be disabled.</p>
	<p>Notification and Worker Safety</p>	<p>The local construction and environment inspectorates and communities have been notified of upcoming activities. All legally required permits (to include not limited to land use, resource use, and dumping, sanitary inspection permit) have been acquired for construction and/or rehabilitation</p>
		<p>Workers' PPE will comply with international good practice (always hardhats, as needed masks and safety glasses, harnesses and safety boots).</p>
<p>Appropriate signposting of the sites will inform workers of key rules and regulations to follow.</p>		
<p>B. General Rehabilitation and /or Construction Activities</p>	<p>Air Quality</p>	<p>Keep demolition debris in controlled area and spray with water mist to reduce debris dust. Suppress dust during pneumatic drilling/wall destruction by ongoing water spraying and/or installing dust screen enclosures at site.</p>
		<p>Keep surrounding environment (sidewalks, roads) free of debris to minimize dust.</p>
		<p>There will be no open burning of construction / waste material at the site.</p>
		<p>There will be no excessive idling of construction vehicles at sites.</p>
	<p>Noise</p>	<p>Water dusty areas, particularly during hot, dry or windy weather.</p>
		<p>Construction noise will be limited to restricted times agreed to in the permit.</p>
	<p>Water Quality</p>	<p>During operations the engine covers of generators, air compressors and other powered mechanical equipment should be closed, and equipment placed as far away from residential areas as possible.</p>
	<p>Waste management</p>	<p>The site will establish appropriate erosion and sediment control measures such as e.g. hay bales and / or silt fences to prevent sediment from moving off site and causing excessive turbidity in nearby streams and rivers.</p>
<p>Waste collection, transport, and disposal sites will be identified for all major waste types expected from demolition and construction activities. Mineral construction and demolition wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers.</p>		

ACTIVITY	PARAMETER	GOOD PRACTICES CHECKLIST	
		Construction waste will be collected and disposed properly by licensed collectors. The records of waste disposal will be maintained as proof for proper management as designed. Whenever feasible the contractor will reuse and recycle appropriate and viable materials	
	Civil-construction works	During demolition, the safety of workers and other users will be provided, as well the safety of equipment. Provide disposal of demolished material, in a way that material is allocated on the marked, enclosed and safety place. Ensure disposal of unusable material.	
	Waste transportation	Transport of waste will be organized in a way that excludes environmental pollution. In the case of pollution appear during the transportation, contaminated area should be cleaned and bring to a state before the pollution.	
C. Wastewater	Water Quality	The approach to handling sanitary wastes and wastewater from building sites (installation or reconstruction) must be approved by the local authorities. Before being discharged into receiving waters, effluents from individual wastewater systems must be either treated or approved for discharge into the public sewerage system to meet the minimal quality criteria set out by national guidelines on effluent quality and wastewater treatment.	
D. Toxic Materials	Toxic / hazardous waste management	Temporarily storage on site of all hazardous or toxic substances will be in safe containers labelled with details of composition, properties and handling information The containers of hazardous substances should be placed in a leak-proof package to prevent spillage and leaching The wastes are transported by specially licensed carriers and disposed in a licensed facility Paints with toxic ingredients such as solvents or lead will not be used	
		Management of waste fuels, oils and lubricants	Collect waste fuels, oils and lubricants. Provide temporarily storage of waste fuels, oils and lubricants that are closed or covered, and labelled. Prevent leaching or evaporation, and change the quality of waste fuels, oils and lubricants.
		E. Affects forests and/or protected areas	Protection



ACTIVITY	PARAMETER	GOOD PRACTICES CHECKLIST
<p>F Traffic and Pedestrian Safety</p>	<p>Direct or indirect hazards to public traffic and pedestrians by construction activities</p>	<p>In compliance with national regulations the contractor will insure that the construction site is properly secured, and construction related traffic regulated. This includes but is not limited to:</p> <ul style="list-style-type: none"> ▪ Signposting, warning signs, barriers and traffic diversions: site will be clearly visible, and the public warned of all potential hazards. ▪ Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction traffic interferes. ▪ Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement. ▪ Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public. Ensuring safe and continuous access to office facilities, shops and residences during renovation activities, if the buildings stay open for the public.



ANNEX 4: ENVIRONMENTAL AND SOCIAL CHECKLIST FOR ENERGY EFFICIENCY

Name of the Sponsors:

Proposed capacity:

Date:

1. Industry typology:		Yes	No
2. DOE category; based on ECR 1997:			
A: Project typology:			
(a)	Is located in or near an area where there is an important historical, archaeological or cultural heritage site?		
(b)	Is located within or adjacent to any areas that are or may be protected by government (e.g. protected tree, heritage site, protected area)?		
(c)	Is located on a water harvesting roof?		
(d)	Is located in an area where plans for future roof uses may affect the project?		
(e)	Produces solid wastes during construction, operation or decommissioning?		
If the answer to any of questions (a) to (e) is “Yes”, the process required for Initial Environmental Examination must be followed.			
B: Environment-			
(f)	Risk causing contamination of drinking water?		
(g)	Need to cut down any trees?		
(h)	Be located within or adjacent to environmentally sensitive areas (e.g. mangroves, wetlands), threatened species or protected tree?		
(i)	Require freshwater during operations?		
(j)	Release any pollutants or any hazardous, toxic or noxious substances to the air during construction or operation?		
(k)	Will there be any liquid discharge to ground water aquifer during construction or operations?		
(l)	Involve use, storage, transport, handling or production of substances or material that can be harmful health or raise concerns about the actual or perceived risks to human health?		
If the answer to any of questions f to l is “yes”, the process required for Initial Environmental Examination must be followed.			



C: Social-			
(m)	Will the building/ relevant space require additional improvement works before installation of energy efficient equipment?		
(n)	Would this project create new and additional jobs?		
(o)	Are there health impacts during implementation stage?		
(p)	Will this project affect livelihood adversely? (If answer is yes and livelihoods will be affected adversely please attach details of how it will be impacted and type, magnitude and severity of impact)		
(q)	If livelihood will be impacted, are there adequate alternatives or compensations considered? (If yes, please provide details)		
(r)	Are there any disputes/complaints from the neighbouring properties?		
If the answer to any of questions m to r is “yes”, the process required for Initial Environmental Examination must be followed.			



**ANNEX 5: PRELIMINARY ENVIRONMENTAL AND SOCIAL SAFEGUARD SCREENING
FORMAT FOR ENERGY EFFICIENT EQUIPMENT AND TECHNOLOGY**

Table 5: E&S Safeguard Screening Format

PART 1: INSTITUTIONAL & ADMINISTRATIVE	
Country	
Project title	
Scope of project and activity	
SITE DESCRIPTION	
Name of site	
Describe site location	Attachment 1: Site Map <input type="checkbox"/> Y <input type="checkbox"/> N
Geographic description	
LEGISLATION	
Identify national & local legislation & permits that apply to project activity. Indicate the institutional authorities with responsibility for implementing each piece of legislation or issuing permits	
PUBLIC CONSULTATION	
Identify when / where the public consultation process took place	
INSTITUTIONAL CAPACITY BUILDING	
Will there be any need for environmental management capacity building (e.g. environmental training, monitoring equipment etc.)?	<input type="checkbox"/> N or <input type="checkbox"/> Y



PART 2: ENVIRONMENTAL/ SOCIAL SCREENING				
Will the site activity include/involve any of the following potential issues and/ or impacts?	Activity and examples of potential issues and/or impacts	Status / Availability in 2km vicinity	Significance (based on likely impact – high/ medium/ low)	Detailed comments
	1. Building rehabilitation <ul style="list-style-type: none"> • Site specific vehicular traffic • Increase in dust and noise from demolition and/or construction • Construction waste • Safety at the site 			
	2. New construction <ul style="list-style-type: none"> • Excavation impacts and soil erosion • Site specific vehicular traffic • Increase in dust and noise from demolition and/or construction • Construction waste 			
	3. Individual wastewater treatment system <ul style="list-style-type: none"> • Effluent and / or discharges into receiving waters 			
	5. Hazardous or toxic materials <ul style="list-style-type: none"> • Use of hazardous/ toxic materials (solvents, fuels, surface coatings etc.) • Removal and disposal of toxic and/or hazardous demolition and / or 			



PART 2: ENVIRONMENTAL/ SOCIAL SCREENING				
	construction waste (e.g. asbestos) <ul style="list-style-type: none"> Storage of machine oils and lubricants 			
	6. Impacts on forests and/or protected areas <ul style="list-style-type: none"> Encroachment on designated forests, buffer and /or protected areas 			
	8. Traffic and Pedestrian Safety <ul style="list-style-type: none"> Site specific vehicular traffic Site is in a populated area 			
	Presence of Indigenous or vulnerable communities			
	Any local conflicts of interest in the project site			
	Land acquisition of private land leading to loss of shelter and livelihood			
	Any loss/ reduction of access to traditional dependent communities (to areas where they earn for their primary or substantial livelihood)			
	Involuntary land taking resulting in loss of income; livelihood; sources of livelihood; loss of access to common property resources and/or			



PART 2: ENVIRONMENTAL/ SOCIAL SCREENING				
	private residential and/or property resources.			
	Any specific gender issues			
	Possible conflicts with and/or disruption to local community			
	Significant issues raised by the stakeholders during consultation			



ANNEX 6: SAMPLE EHS COMPLIANCE REPORT FORMAT

PART-A: Existing Textile manufacturing plant

(please provide relevant photographs where they are required)

A. Environmental policy

- Under this section, please mention your EHS Policy

B. Description of existing facility

- Under this section following aspects are to be covered:
- Description of production process
- Please briefly describe the current textile production process with process flow diagram.
- Description of raw materials
- Please describe the amount of different raw-materials required for current production.

Name of raw materials	Approximate monthly requirement

- Monthly quantity of production
- Please briefly mention the amount of production of different types of end product.

Types of cement	Approximate monthly production in Ton

- Monthly amount of required water and electricity consumption Please briefly mention the amount of required electricity and water

Utilities	Amount of monthly consumption	Source of supply
Electricity		
Water		

C. Environmental aspects

- Under this section following aspects are to be covered:
- Description of process waste water management process.

- Describe the potential sources of air pollution/dust emission and how they are managed⁹.
- What are the potential sources of noise in the industry and how they are managed¹⁰?
- Are there issues in relevant to VOC, odour and heat; and how they are managed?
- How traffic safety is ensured to protect internal officials as well as adjacent stakeholders/communities?

D. Fire and chemical hazard management

- Under this section following aspects are to be covered:
- Arrangement of smoke detectors, sprinklers and alarm system
- Description of fire hydrants including capacity of water storage tank
- Type, number and distribution of fire extinguishers
- Arrangement of fire alarm/PA system/intercom
- Description of emergency evacuation plan
- Whether there is regular fire drill arrangement

E. Medical, first aid and Personal Protective Equipment (PPE)

- Under this section following aspects are to be covered:
- What are the medical treatment facilities in case of occupational injury
- Whether there are trained doctor/nurses to take of occupational health and safety. In this case following tabular format may be used:

Name	Qualification	Years of experience	Cell no.

- Description of arrangement PPE
- Please describe whether there is any awareness session/training on occupational health safety
- Please describe whether there is any agreement with a good quality hospital/clinic?

F. Social aspects

- Under this section following aspects are to be covered:
- How many workers and officials are working and what is the number of male and female workers?
- Whether there is any designated Labour Policy
- Arrangement of grievance redress mechanism

⁹ Based on the type of industry, there might be generation of significant air pollutants including the finishing process (e.g. coating and dyeing operation). Other significant sources of air emissions in textile industries include drying, printing, fabric preparation and wastewater treatment residues.

¹⁰ This list may captive power plant, ETP, boiler and so on.

- Whether there is any issue with child labour and how it is addressed

Please describe your policy and facility in regard of female workers/officials

G. Institutional arrangement

- Under this section following aspects are to be covered:
- Are there designated officials to take care environmental and social issues?
- Please describe their educational qualification and training
- How the various issues in relevant to environment and social are communicated to the top management
- What is the arrangement to take care of grievances?

PART-B: Project site where the construction activities is going on

(please provide relevant photographs where they are required)

A. Major Activities with number of employees

- Under this section please provide information on:
- List of major activities
- Number of workers engaged in each activity

B. Accommodation arrangement

- Under this section please provide information on:
- How many workers/officials live within the project premises
- How many workers live outside of project boundary
- What is the accommodation facility for the workers living within the project boundary?

C. Air pollution prevention

- Under this section please provide information on:
- Please describe the potential sources of air pollution at project site
- Please describe the various measures that are taken to mitigate air pollution

D. Noise pollution prevention

- Under this section please provide information on:
- Please describe the potential sources of noise pollution at project site
- Please describe the various measures that are taken to mitigate noise pollution

E. Traffic congestion management

- Under this section please provide information on:
- Please describe the average number and types of vehicles entering in the project site
- Please describe the various measures to prevent the risk of potential accident from vehicles

- Please describe whether there is any initiative to briefly aware the workers and officials about the basic road safety rules

F. Sanitation facility

- Under this section please provide information on:
- Please describe the sanitation facility at project site by mentioning the number of toilets and urinals.
- Please mention the cleaning/disposal arrangement of these toilets and urinals

G. Waste Management

- Under this section please provide information on:
- Please mention the potential sources of wastes.
- Please describe the disposal arrangement of different types of wastes

H. Fire Fighting

- Under this section please provide information on:
- Please describe the risks of fire and potential sources of fire hazard at project site.
- Please describe the firefighting arrangement at project site
- Have you conducted any fire drill in the project site?

I. Medical Facility

- Under this section please provide information on:
- Please mention the potential risky activities in respect of health hazard
- Please describe the first aid/medical facility at project site
- What is the arrangement in case of serious injury?

J. Grievance Redress Mechanism

- Under this section please provide information on:
- Please describe whether there is any arrangement to lodge grievance of workers and officials.
- Please mention the process of grievance redressal
- Please describe the grievance lodging arrangement like log book, log Box

K. Application of personal protective equipment (PPE)

- Under this section please provide information on:
- Please describe the process that you follow in ensuring PPE to workers to permanent workers.
- Please describe the PPE arrangement that you follow in case of temporary workers
- Please describe the PPE arrangement that you follow in case of workers of EPC contractors
- Please describe the process that you follow in case of overseas experts/officials

L. Arrangement of compensation and insurance

- Under this section please provide information on:

- Please describe the compensation arrangement in case of injured permanent workers.
- Please describe whether you will provide any compensation to temporary workers or workers of EPC contractors, if they are seriously injured.
- Please describe the compensation arrangement if any worker accidentally die or seriously injured (please cover permanent workers, temporary workers and overseas workers)

M. Gender and child labour

- Under this section please provide information on:
- Please mention whether female or children are deployed in the project and mention the type of their engagement
- Whether you follow the uniform salary and benefit package for all workers or there is special arrangement for any specific group.

N. Institutional arrangement

- Under this section please provide information on:
- Please describe whether there is any designated official to take care EHS issue at project site including his qualification and job responsibilities.
- Please mention the documents/guidelines or standards that you follow in maintaining EHS compliance ta project site.

O. Incidence investigation

- Under this section please provide information on:
- Please describe whether there is any incidence of health hazard or accident has been occurred in the project site.
- If occurred, how you have managed it? Please describe in light of treatment, leave and financial compensation



ANNEX 7: LIST OF LEGAL DOCUMENTS REQUIRED

1. Clearance from Department of Environment
2. Clearance from Fire Department (as applicable)
3. Clearance from Boiler Department (as applicable)
4. Clearance to use hazardous chemicals (as applicable)
5. Clearance from Factory Inspection Department (as applicable)
6. Clearance for using hazardous chemicals (as applicable)
7. Any other clearance required based on the scale and type of the company
8. Whether the respective industry is accredited with international compliance like ISO 14001, ISO 9001, OHSAS 18001, SA 80001 and so on.
9. Status of ACCORD/ ALLIANCE compliance audits with major findings and how long they have been addressed/implemented.

ANNEX 8: LIST OF REFERENCES

- IDCOL Environmental and Social Management System (ESMS), July 2018
- IDCOL Environmental and Social Safeguards Framework (ESSF), Policy and Procedures, August 2011
- IDCOL Environmental and Social Management Framework for project “Bangladesh: Rural Electrification and Renewable Energy Development Project II (RERED II)”, April 2014
- Green Climate Fund GCF/B.19/06, “Environmental and social management system: environmental and social policy”
- Environmental and Social Management Framework for project “Eastern Caribbean Partial Credit Guarantee Corporation OECS MSME Guarantee Facility” (P157715), February 2018
- Draft Environmental and Social Management Framework - Solar PV Park in India, December 2015
- Environmental and Social Management Framework, BOAD Climate Finance Facility to Scale Up Solar Energy Investments in Francophone West Africa LDCs, October 2016
- Environmental and Social Management Framework (ESMF), Montenegro Energy Efficiency Project – MEEP 2, March 2018
- Environmental and Social Management Framework (ESMF), Nigeria Solar IPP Support Program, January 2019
- Environmental and Social Management Framework (ESMF), LAO PDR - Small and Medium Enterprise Access to Finance Project (P131201), Marc 2014
- Environmental and Social Management Framework, Accelerating the Transformational Shift to a Low Carbon Economy in the Republic of Mauritius (UNDP, GCF), October 2016
- Environmental and Social Management Framework, Vietnam Scaling Up Energy Efficiency (MoIT), May 2018
- IFC Environmental, Health, and Safety Guidelines, General EHS Guidelines: Environmental - Air Emissions and Ambient Air Quality
- Environmental and Social Management Framework, Enhancing adaptive capacities of coastal communities, especially women, to cope with climate change induced salinity in Bangladesh (UNDP, GCF), September 2017
- Environmental and Social Management Framework, Responding to the increasing risk of drought: building gender-responsive resilience of the most vulnerable communities in Ethiopia (UNDP, GCF)
- Environmental and Social Management Framework, FinBrazeec Project - Financial Instruments for Brazil Energy Efficient Cities (Caixa Econômica Federal, World Bank)

ANNEX 9: COMPONENTS TO BE COVERED IN PROGRAM LEVEL ESMS TO BE DEVELOPED BY PROPONENT

Since the project is an FI operation, the proponent shall develop an Environmental and Social Management System (ESMS) that is specific to the program based on the existing environmental and social management system of IDCOL and the result of the audits conducted.

The ESMS for this program shall describe the existing IDCOL system, identify and fill-in the gaps vis-a-vis the GCF's ESS Standards, and shall include additional policies, measures and requirements as necessary to better address the issues identified in the audit. It will also describe in sufficient details the due diligence process to be undertaken for Component 1. Moreover, the ESMS shall integrate in the due diligence process a program-level Grievance Redress Mechanism (GRM) and program-level Stakeholder Engagement Plan (SEP).

There will be an Executive Summary which should include a summary information of the applicable national, AE and GCF policies, laws and regulations, project activities and their environmental and social risks and impacts and management measures, including plans and frameworks that are applicable to the project. It should additionally include institutional arrangements, monitoring, review and reporting as well as results of the public consultations carried out and the grievance redress mechanism that will be put in place.

A. Risk assessment

- (a) Risk of inadequate environmental and social assessment of individual projects. Some repairs/retrofitting or capacity expansion of existing factories entail civil works and industrial construction and when operational would have higher waste generation capacities. However, these undertakings should be categorized as repair and hence may not be subject to government's EIA requirements. There is a need to assess whether the present EIA system in Bangladesh would adequately cover the projects to be funded under the program and would need to be considered in the ESMS.
- (b) Risks relating to labour and working conditions. The textile industry in Bangladesh have moderate issues on worker's rights (i.e. wages below legal minimum, and long working hours); discrimination against women in terms of tasks assignments, promotions and wages; employment of minors; unsafe, unhealthy and overcrowded workplace with inadequate amenities; and poor accommodation.
- (c) Potential increase in water pollution. Textile factories produce large amounts of wastewater which may be released into water bodies without proper treatment. The wastewater from textile factories could contain formaldehyde, phthalates, organochlorines, lead, and many other chemicals that could cause severe health problems.
- (d) Resource efficiency - The textile factories are known to use large amounts of water. Water is used extensively throughout textile processing operations. Dyes, specialty and finishing chemicals are applied to textile substrates from water baths while most fabric preparation steps use aqueous systems. and the ESMS can include and identify feasible conservation measures at the program level that could encourage factories to adopt water conservation measures. The factories also consume significant amounts of thermal and electrical energy. While the program itself is intended to support the adoption of energy saving technologies, the ESMS should provide additional information to help craft additional policy measures that would ensure that energy efficiency is achieved.

- (e) Reputational risk from suppliers - Suppliers of construction materials and raw materials for the operations of textile factories or of garment factories, may be produced with questionable labour and environmental standards. Companies receiving financing from the program may need to require their suppliers to show certain evidences or certifications that it meets certain standards.
- (f) Risk from legacy issues - Companies/factory establishments that would receive financing support from the program could have pending or unresolved environmental and social compliance issues in its operations or construction activities. Thus, the due diligence shall cover not only new expansion or operations to be funded but also the existing operations of the factory establishments. An environmental and social compliance audit of existing facilities and preparation of corrective measures may need to be done.

B. Screening of environmental and social issues

- The ESMS will need to provide a more detailed procedures for identifying and screening environmental and social issues of sub-projects during project implementation (screening checklists and identification of cumulative, indirect and induced impacts, in line with relevant AE and GCF E&S safeguards standards). Screening has the following purposes: (i) screen subprojects for potential environment and social risks and impacts; (ii) identify applicable ESS standards / IFC PSs; (iii) determine the E&S category of the subproject; and, (iv) determine the specific instrument/s to be prepared for each subproject. The procedure for Component 1 with the AE as the EE may need to be described separately. The due diligence process to be undertaken for Component 1 (Direct Financing to Textile Companies) proposals can include initial screening and categorization of financial transactions (loans) based on their risks, review of safeguard documents, site inspections, monitoring the clients' ES performance, and documentation.

C. Safeguards identification

- The ESMS would need to describe the procedures for determining appropriate and required safeguards instruments for site-specific sub-projects that will be identified during project implementation. This section would provide information on the type of management instrument (for example, full-blown ESIA, indigenous peoples plan, environmental and social compliance audits, etc.) as well as preparing and approving site-specific safeguard instruments which could include a framework of actions to guide the development of subproject ESIA and Environmental and Social Management Plans (addressing preventive and mitigation measures, monitoring actions and responsibilities for management such measures and monitoring their implementation) or implementing Environmental Codes of Practices during subproject implementation; and generic health and safety measures for rehabilitation activities including emergency preparedness and response.
- The ESMS would have to describe the project-level safeguard activities and documentary requirements, if any, that would be required from the direct borrowers (in the case of textile sector) and from the participating FIs (in the case of the garment sector). The requirements for the textile sector could include the conduct of ES screening, ESIA, Consultation, project-level GRM, etc. This part of the ESMS shall provide not only the list of requirements but also instructions, guidelines, criteria, templates, forms to help proponents of individual subprojects fulfil the requirements..

D. Institutional arrangements

A description of the institutional arrangements for project implementation may need to be expounded with focus on who will do what specific functions on environmental and social safeguards. This would include a clear definition of roles and responsibilities of project staff and associated agencies in sub-project implementation and application of environmental and social review, preparation and implementation of safeguard instruments, monitoring, and evaluation. This has to describe the institutional arrangements needed for implementation of Component 1. The ESMS will have to clarify the organizational structure for implementing the ESMS including the GRM and SEP, the decision-making process, roles and responsibilities, capacity needs of staff and capacity building plan.

E. Stakeholder consultation and grievance redressal

- The ESMS also has to describe the consultation and stakeholder engagement framework for relevant stakeholders of sub-projects during program implementation. This would also include disclosure procedures for safeguard instruments for sub-projects /sub-activities to comply with the AE's and GCF's Information Disclosure Policy as well as the requirements of the GCF Environmental and Social Policy on disclosure of subprojects [which indicates that: in the case of Category A/B subprojects, the ESIA and an Environmental and Social Management Plan (ESMP) will be disclosed at least 30 days prior to the approval... The full versions of safeguard reports will be available in both English and Bangla since English is not the local language. The reports will be submitted to GCF and made available to GCF via electronic links in both the AE and the GCF's website as well as in locations convenient to affected peoples in consonance with requirements of GCF Information Disclosure Policy and Section 7.1 of (Information Disclosure) of GCF Environmental and Social Policy].
- The Grievance redress mechanism has to provide a more detailed procedure on how stakeholders and potentially affected communities and households will have avenues to provide feedback or grievances, and receive responses, with regard to the implementation of sub-projects (including provisions for the AE to ensure that information about the GCF Independent Redress Mechanism as well as information about the Accredited Entity's Grievance Redress Mechanism (including contact details, accessibility and basic procedures of such mechanisms, etc.) is brought to the attention of executing entities, people and beneficiaries in the project target area and the public prior to the implementation of the project and will notify the Fund that such information has been provided to the relevant parties.

F. M&E, capacity building and implementation support

- The ESMS has to include monitoring and evaluation arrangements to monitor the implementation of the ESMS and site-specific safeguard instruments prepared by the AE and the PFIs.
- The ESMS can also include the capacity building activities/program to enable executing entities and involved institutions and stakeholders to implement the ESMS, including preparation, implementation, and monitoring of site-specific safeguard instruments and measures. The capacity building activities can be based on the review of the structure and staffing of the PFIs and an assessment of their capacity to implement their own ESMS.
- The ESMS can also include description on how the implementation of the ESMS will be financed.



G. Annexure list

- Best Practices Checklist can include provisions for what is applicable to the textile industry that it is focused. For instance, the program is not envisaged to affect forests and protected areas and may not need this best practise provision.
- Checklists and screening for other sectors which the program is focused (e.g. textile and garments, etc, if any).
- Exclusion list (list of activities that the programme will not finance, e.g. Category A sub-projects);
- Eligibility list;
- Stakeholder Engagement Framework/ Plan