**Annex 12: Environmental and Social Action Plan**

**Part A: Risk Factors**

The questions describe the “risk factors” of activities that would require additional assessments and information. Any “Yes” response to the questions will render the proposal not eligible for the Simplified Approval Process Pilot Scheme. Proposals with any of the risk factors may be considered under the regular project approvals process instead.

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| **Exclusion criteria** | **YES** | **NO** | **Remark** |
| Will the activities involve associated facilities and require further due diligence of such associated facilities? |  |  | All the activities such as plinth raising, goat/sheep rearing in the slated house, tube well and toilet installation and the cultivation of resilient crops practiced in the community climate change project (CCCP). That activities still prevailed in the flood prone areas of Bangladesh. Our experience shows no cumulative impacts that would require further detailed due diligence and management planning. |
| Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to downstream riparian states? |  |  | The project will implement some community based adaptation activities in the flood prone grass root areas of Bangladesh. The activities do not have trans-boundary impacts. |
| Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women, child labour? |  |  | After implementation of the activities, the community particularly the women and children will be mostly benefitted. The community based activities which are going to be taken under the project will not have negative impacts in terms of health and safety of the workers. Vulnerable women and no children will be employed under the project. Although there are no hazardous or dangerous activities under the project, however, proper safety measures such as first aid facility, employing the skilled labour will be ensured. |
| Will the activities potentially generate hazardous waste and pollutants including pesticides and contaminate lands that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards? |  |  | The said activities under the project will produce some organic waste. There will be no hazardous waste and pollutant including excess use of insecticide and pesticide. However, in the agricultural practices mostly organic technology and integrated pest management (IPM) technology will be used. |
| Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and river bank infrastructure) that would require further technical assessment and safety studies? |  |  | The activities under the project do not include the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and river bank infrastructure) that would require further technical assessment and safety studies. |
| Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities? |  |  | The activities under the project do not involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities. |
| Will the activities be located in protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites? |  |  | The areas under the project activity do not have any connection with the protected areas and areas of ecological significance including critical habitats, key biodiversity areas, and internationally recognized conservation sites. |
| Will the activities affect indigenous peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans? |  |  | There are no indigenous people living in the proposed project areas. |
| Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage? |  |  | In the project areas do not have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage. |

**Part B: Specific environmental and social risks and impacts**

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| --- | --- | --- | --- | --- |
| **Assessment and Management of Environmental and Social Risks and Impacts** | **YES** | **NO** | **TBD** | **Remarks** |
| Has the AE provided the E&S risk category of the project in the concept note? |  |  |  | The risk category is provided based on screening result in section A. |
| Has the AE provided the rationale for the categorization of the project in the relevant sections of the concept note or funding proposal? |  |  |  | The project provided explanation against each exclusion criteria on why the AE responed ‘NO’. |
| Are there any additional requirements for the country? |  |  |  |  |
| Are the identification of risks and impacts based on recent or up-to-date information? |  |  |  | The risks have been identified based on monitoring information of the earlier Community Climate Change Project (CCCP) and recent field visit with GCF team members during 2-7 March 2019. |
| **Labour and Working Conditions** | **YES** | **NO** | **TBD** |  |
| Are the proposed activities expected to have impacts on the working conditions, particularly the terms of employment, worker’s organization, non-discrimination, equal opportunity, child labour, and forced labour of direct, contracted and third-party workers? |  |  |  | The project will not allow child and forced labour. Some of the activities will be carried out by the beneficiaries. For example, drought resilient crop cultivation will be implemented by respective beneficiaries whereas plinth raise, tube wells and flood resilient latrines will be implemented by local contractors using appropriate procurement method. The IE will procure these works. |
| Will the proposed activities pose occupational health and safety risks to workers including supply chain workers? |  |  |  | The activities are household based and small community infastucture like plinth raise, tube well installation etc Some of the activities may create dust which may affect the workers. However, this can be manged by using dust mask. |
| **Resource Efficiency and Pollution Prevention** | **YES** | **NO** | **TBD** |  |
| Are the activities expected to generate (1) emissions to air; (2) discharges to water; (3) activity-related greenhouse gas (GHG) emission; and (5) waste? |  |  |  | None of the proposed activities may generate (1) emissions to air; (2) discharges to water; (3) activity-related greenhouse gas (GHG) emission; and (5) waste. |
| Are the activities expected to utilize natural resources including water and energy? |  |  |  | Plinth raise activity will use alluvial sand. The other activities will not require any natural resources. |
| Will there be a need to develop detailed measures to reduce pollution and promote sustainable use of resources? |  |  |  | The activities will require only human resources (Off-farm and farming labour) and locally available materials like sand, bamboo, pipes for tube wells, tube well head, seeds, fertilizer etc. Hence, there is no need to develop detailed measures to reduce pollution and promote sustainable use of resources. |
| **Community Health, Safety, and Security** | **YES** | **NO** | **TBD** |  |
| Will the activities potentially generate risks and impacts to the health and safety of the affected communities? |  |  |  | None of the activity will generate risks and impacts to the health and safety of the affected community. |
| Will there be a need for an emergency preparedness and response plan that also outlines how the affected communities will be assisted in times of emergency? |  |  |  | The activities are mainly household based and farming related. So, we do not expect any emergency situation that will require emergency preparedness and response plan. |
| Will there be risks posed by the security arrangements and potential conflicts at the project site to the workers and affected community? |  |  |  | The individual beneficiaries will take part in the project activities. The beneficiaries will be selected using pre-defined criteria. The local government institutions and communities will be involved in selecting the benericiaries. Besides, each implementing entities will procure necessary goods, works and services following public procurement rules and acts of the government and PKSF’s procurement guideline. So, we expect that there will not be any conflict in the project site. |
| **Land Acquisition and Involuntary Resettlement** | **YES** | **NO** | **TBD** |  |
| Will the activities likely involve voluntary transactions under willing buyer-willing-seller conditions and have these been properly communicated and consulted? |  |  |  | All the activities will be implemented on beneficiaries own land and there is no issue of land acquisition and involuntary resettlement plan. |
| **Biodiversity Conservation and Sustainable Management of Living Natural Resources** | **YES** | **NO** | **TBD** |  |
| Are the activities likely introduce invasive alien species of flora and fauna affecting the biodiversity of the area? |  |  |  | The activities will not introduce any invasive species. |
| Will the activities have potential impacts on or be dependent on ecosystem services including production of living natural resources? |  |  |  | The activities will not depend on ecosystem services including production of living natural resources. For example, plinth raise will use alluvial sand which is available in the selected char areas, slatted house will use bamboo and corrugated iron sheet etc. |
| **Indigenous Peoples** | **YES** | **NO** | **TBD** |  |
| Are the activities likely to have indirect impacts on indigenous peoples? |  |  |  | There is no indigenous people in the selected districts. |
| Will continuing stakeholder engagement processes and a grievance redress mechanism be integrated into the management / implementation plans? |  |  |  | A stakeholder engagement plan is developed and presented in the pre-feasibility study. A grievence redress mechanism is incorporated in the revised proposal. |
| **Cultural Heritage** | **YES** | **NO** | **TBD** |  |
| Will the activity allow continuous access to the cultural heritage sites and properties? |  |  |  | There is no cultural heritage sites and properties in the districts. |
| Will there be a need to prepare a procedure in case of the discovery of cultural heritage assets? |  |  |  | The culture of the selected areas are homogenous and there is very few chance to discover cultural heritage assets. |

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| **Sign-off:** *Specify the name of the person responsible for the environmental and social screening and any other approvals as may be required in the accredited entity’s own management system.* |

C. **Environmental and social action plan**

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| --- | --- | --- | --- | --- | --- | --- |
| **Summary of risks** | **Mitigation measures** | **Risk significance** | **Responsible party/person** | **Schedule** | **Expected results** | **Cost/Budget** |
| *This contains the description of risks and can be derived from the responses to the screening questions in Part B2.* | *Options to avoid, reduce, mitigate risks and impacts. This may also indicate additional due diligence and specific management plans* | *This contains a description of the overall level of risk\** | *Individual person, unit, or entity tasked to carry out the mitigation measures* | *Timing of implementation of measures including any additional due diligence and management plans and may depend on the stage of implementation* | *Expected outputs of the measures* | *Estimated cost of carrying out the measures* |
| Loss of agricultural land | * Location should be fixed such a way that no loss of agricultural land, forest, wetlands * Alternative location can be considered | slight | Implementing entities under the supervision of executing entity | During implementation of the activity as per work plan (initial stage of project implementation, during the time of cluster selection for plinth raise) | As the char lands (area) of the five selected districts are quiet large compare to the project intervention. Mitigation measures will ensure to get the expected areas without losing any agricultural land. | No budget implication |
| Increase in fugitive dust level | * If works are conducted in the dry season, wet the exposed areas and stockpiles of earth material, particularly to minimize windborne particles and fugitive dust. * For worker health and safety, all workers should be supplied with dust masks | slight | Implementing entities under the supervision of executing entity | During implementation of the activity, as per work plan | It is expected that the mitigation measures will significantly reduce the risks of increasing dust and keep the environment healthy. | No budget implication |
| Small injuries to the worker | * Ensure use of hand gloves * Ensure use of helmet * Ensure primary health care services | slight | Implementing entities under the supervision of executing entity | During implementation of the activities | Mitigation measures will significantly reduce the risk of small injuries |  |
| Contamination of ground water particularly tube well water (through toilet) | * The safety tank will be constructed with soak (sand and coarse layers at the bottom) so that the germs are soaked and only clean water would mix with ground water * Tube wells will be set up at least 30 ft. distant from the safety tank. | slight | Concerned beneficiaries and the implementing entities. | During implementation of the activity as per work plan | This will protect contamination of ground water (tube well water) | No budget implication |
| Ground water level may be lowered | The precipitation and fluvial process of the country usually facilitate natural recharge of ground water particularly for hand tube wells. In addition, the project will construct soak well for preserving the waste water which will be automatically recharged later on. | slight | Concerned beneficiaries and the implementing entities. | During implementation of the activity as per work plan | This will significantly reduce the loss of ground water. | No budget implication |
| Viral and bacterial diseases may transmit from slatted houses of goat/sheep | * Training to beneficiaries on cleaning of goat/sheep shed * Training to beneficiaries on disposal and dumping of goat/sheep fecal matter to nearby safe dumping / collection corners * Aware to control odor, insects and mosquito breeding around the goat/sheep rearing farm * Training to beneficiaries on making compost/slurry management | slight | Concerned beneficiary under the supervision of environmental expert (focal point) of implementing entity. | During implementation of the activity as per work plan. The ongoing mitigation measures will be included in the quarterly report (there will be separate environmental reporting (separate chapter) under the quarterly report) | Mitigation measures will significantly reduce the risk of spreading viral and bacterial disease | No budget implication |
| Chemical contamination to surface and ground water due to excessive use of chemical fertilizer, insecticide and pesticide | * Integrated pest management will be promoted * Vermi-compost will be promoted to reduce use of chemical fertilizers * Organic pest control techniques will be adopted | slight | Concerned beneficiary under the supervision of environmental expert (focal point) of implementing entity. | During implementation of the activity as per work plan. The ongoing mitigation measures will be included in the quarterly report (there will be separate environmental reporting (separate chapter) under the quarterly report) | Mitigation measures will reduce the risk of chemical contamination | No budget implication |

**In every cases the CCAG and the community will support to implement the mitigation measures effectively**

*\*Risk significance. The probability of occurrence is the likelihood for a risk to occur and can be characterized in terms of the degree to which it will happen (for example, the UNDP screening procedure uses “expected, highly likely, moderately likely, not likely, and slight”). The impact or magnitude of risks is the description of how severe the impacts would be if it were to occur (for example, “critical, severe, moderate, minor, and negligible”). A significance value of the risk (for example low, medium, high) can be obtained by combining the probability and impact values. The risk significance indicates the relationship between probability and severity or magnitude of impacts. The entities or organizations that will be implementing the proposed activities are best positioned to define the probability of occurrence and severity or magnitude of impacts.*

*There is no single technique to determine the significance of risks nor will it apply in all situations. The entities and organizations that will be implementing the activities will need to determine which technique will work best for each situation. Determining risk significance would require an understanding of activities and locations, the urgency of situations, and objective judgment.*

**Grievence Redress Mechanism**

Grievance Redress Mechanism (GRM) will be established at central (PKSF) and IE level to deal with any complaints/grievances about environmental issues. At the IE level, the Union Parishad (U/P) Chairman or his/her nominated representative from the U/P will be the Local Grievance Redress (LGR) focal point. At the PKSF central level, the Programme Officer (Environment) or any other person/staff nominated by the Project Coordinator of PMU will be Central Grievance Redress (CGR) focal Point. The aggrieved persons or entities will submit the complaints/grievances in sealed envelopes to the selected partner’s office duly entered in the Grievance Register (GR) and will collect a receipt with entry reference to the GR. Partners will not open the envelopes, but inform the LGR focal point about receipt of complaints and schedule hearings as per his/her advice. In open meetings, the selected/implementing partner will facilitate the LGR focal Point to hear and discuss the complaints and resolve them in view of the applicable guidelines. The aggrieved person, if female, will be assisted by a female U/P member in hearing, and if from a tribal community, by a tribal representative. LGR focal Point with the help of IE will ensure sending a copy of the complaint by postal mail, email or other means to the Project Coordinator at the PKSF headquarters.

The IEs will forward the unresolved cases with all proceedings to the Central Grievance Redress (CGR) focal point within 7 days of taking decision by the LGR focal point. Unresolved cases forwarded by IEs will be registered in the office of the CGR focal point and disposed within 15 days. If any decision made by CGR focal point is unacceptable to the aggrieved persons, he/she will forward the complaints with all proceedings to the PKSF Managing Director (MD). The MD will review and resolve the cases which will be final for PKSF. The MD may seek advices from the PKSF Chairman for any critical issues as per his discretion. A decision agreed by the complainants at any level of hearing will be binding on the concerned IEs and PKSF. The GRM will, however, not pre-empt an aggrieved person’s right to seek redress in the courts of law.

The aggrieved persons or entities will have the option to lodge the complaints directly to the Central Grievance Redress (CGR) focal point if they are against the IE, to the PKSF MD if they are against the PKSF project management. or directly to the Governing body/chairman of PKSF if there is any issue related to PKSF itself. The institutional arrangement of Grievance Redress Mechanism is illustrated below:

Aggrieved Persons/Entities

Local GR Focal Person

(Union Parishad Chairman/nominated person)

GR Focal Person at IE

Project Coordinator at PKSF

Managing Director, PKSF

Governing Body of PKSF/Chairman of PKSF

Figure: Institutional Arrangement of GRM