

Resettlement and Small Ethnic Communities Plan

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Bangladesh: Coastal Towns Climate Resilience Sector Project – Kuakata Town Roads Subproject

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CURRENCY EQUIVALENTS

(as of 31 March 2022)

Currency unit	–	Bangladeshi taka (BDT)
BDT1.00	=	\$0.0116
\$1.00	=	BDT86.225

ABBREVIATIONS

ADB	-	Asian Development Bank
BRM	-	Bangladesh Resident Mission
CBO	-	Community based organization
COVID-19	-	coronavirus disease
CRO	-	Complaint Receiving Officer
CTEIP	-	Coastal Towns Infrastructure Environmental Infrastructure Project
DDC	-	detail design consultant
DOE	-	Department of Environment
EMP	-	environment management plan
FGD	-	focus group discussion
GRC	-	grievance redress committee
GRM	-	Grievance redress mechanism
IEE	-	initial environmental examination
IPSC	-	inter-ministerial project steering committee
LGED	-	Local Government and Engineering Department
NbS	-	Nature-Based Solution
NGO	-	Non-governmental organization
O&M	-	operations and maintenance
PIU	-	project implementation unit
PMSC	-	project management supervision consultant
PMU	-	project management unit
ROW	-	right-of-way
RF	-	resettlement framework
RP	-	resettlement plan
SPS	-	safeguard policy statement

WEIGHTS AND MEASURES

cm	–	centimeters
km	–	kilometer
m	–	meter
m ²	–	square meter
mm	–	millimeter
m ³	–	micrograms per cubic meter

NOTES

- (i) The fiscal year (FY) of the Government of Bangladesh and its agencies ends on 30 June. "FY" before a calendar year denotes the year in which the fiscal year ends, e.g., FY2021 ends on 30 June 2021.
- (ii) In this report, "\$" refers to United States dollars.

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EXECUTIVE SUMMARY

Background: The proposed Coastal Towns Climate Resilience Sector Project (CTCRSP) is a continuity to the ADB supported Coastal Towns Infrastructure Environmental Infrastructure Project (CTEIP) in 10 coastal towns that effectively commenced on September 2014 and will be completed on June 2022. CTCRSP will strengthen climate resilience and disaster preparedness in 22 (twenty-two) vulnerable coastal *pourashavas* (secondary towns) of Bangladesh. The project has four major outputs as follows: (i) Output 1: Municipal infrastructure for resilience improved; (ii) Output 2: Resilient livelihood improved; and (iii) Output 3: Institutional capacity, governance, and climate-awareness strengthened. The Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) will be the Executing Agency. Pourashavas are the implementing agencies of the project.

Subproject Description: The Kuakata Town Roads subproject covers the improvement of existing two earthen roads with total length of **0.485 km** including **0.495 km** roadside drain work using reinforced cement concrete (RCC).

Scope of Land Acquisition and Resettlement: Civil works under the subproject are proposed within the boundaries or right of way (ROW) of government land.. 10 house owners near the road have expressed the urgent need for a good road and drainage and based on a consultation conducted by themselves within their small ethnic community, expressed their preference to provide right to use of the small portion of lands (about 2-3 feet land along the existing road alignment, without donation or transfer of ownership of the said portion). During final detailed design and detailed measurement stage, the houseownes will be provided with an option for negotiated settlement, for which a provisional sum has been included in this RSECP. Details of this will be recorded during updating of the draft RSECP during final detailed design and detailed measurement survey stage. Through transect walk and survey in the proposed alignment, based on initial design, involuntary resettlement impacts were assessed. It includes (i) two roadside shops owners will incur temporary income loss for the period of disruption (estimated as seven days) during the construction phase; and(ii) loss of 48 trees (used to define property boundaries or grow fruits for own consumption) belonging to four households. These four households losing trees are among the 10 households who have signified their preference to provide rights to use of land for the project; (iii) the remaining six households have agreed to provide rights to use of lands without ownership transfer, and will also have the option of negotiated settlement, whichever is preferred. All the 12 households belong to a small ethnic community – the Rakhain community. This draft resettlement and small ethnic community plan (RSECP) is based on survey of proposed alignments of two roads proposed through Rakhain Palli based on the available preliminary design for the subproject component. For the drainage component, a small portion outside Rakhain Polli will pass through two private plots. The two plot owners have not yet been identified, hence could not be surveyed or consulted in this draft resettlement plan. However, it has been assessed that the owners of the 2 plots will lose less than 10% of their vacant and unused (unproductive) plots. The Pourashava proposes to obtain the land required for the small portion of drainage outside Rakhain Polli (leading to the outfall) using land donation or negotiated settlement, whichever is the preferred method of the owners of the 2 plots, with third party certification and oversight. In the event that the owners of the two plots are found to be vulnerable, land donation will not be an option. On finalisation of detailed design, the involuntary resettlement impacts will be further reassessed and confirmed during detail measurement survey (DMS). The draft RSECP will be updated based on detailed design, DMS, and site-specific consultations, and will include 100 percent assessment of impact on all the stretches along which the roads and drains will be constructed.

Impact on indigenous peoples: In Kuakata pourashava area, under Patuakhali district, there is a population of 1.6% SEC belonging predominantly to Rakhain community. The proposed roads will be constructed at Kuakata town, within the area inhabited by the Rakhain community within plot number 3266, which is inhabited by Rakhain community members. There is a felt need among the Rakhain community for proper roads for safe evacuation during cyclones and other natural disasters, allowing access to ambulances when required by community members and providing improved access and connectivity to markets, jobs, schools and health centers. All affected households facing involuntary resettlement impacts (temporary income loss and loss of trees) belong to Rakhain community. No direct or indirect impact to the dignity, human rights, livelihood systems or natural or cultural resources of Rakhain community, is anticipated. The impact to the community will be mostly beneficial, and the proposed road improvement is anticipated to benefit 25 Rakhain community households (103 persons). Loss of trees and temporary economic impacts to 6 SEC households is assessed. A total of 10 SEC households (of which 4 also face loss of trees) have agreed to provide right to use strips of land to the pourashava without transfer, and will also have the option of negotiated settlement. Since impact to SEC is assessed, a specific action plan for enhancement of project benefits to the affected small ethnic community is prepared in this RSECP in line with the project's resettlement framework and Small Ethnic Communities Planning Framework (SECPF). Road construction work will be undertaken in a culturally appropriate manner, taking into account the specific preferences and concerns of the community, if any, their religious festivals and beliefs. This draft RSECP has been prepared consistent with the provisions stipulated in the resettlement framework and the RSECF.

Consultation and Disclosure: Project objectives, goals and scope of work of the subproject component have been disclosed to the potential beneficiaries of the project, affected persons, elected representatives and institutional stakeholders. The approved entitlement matrix and RSECP will be made available at public locations within the town, within the concerned Rakhain community (through signages and consultation meetings) and will be disclosed to a wider audience through the LGED and ADB website. A copy of the RSECP, translated in local language, will be always kept at site during the construction period.

Grievance Redress Mechanism: A project-specific grievance redress mechanism (GRM) will be established to receive, evaluate, and facilitate the resolution of affected person concerns, complaints, and grievances about the social and environmental performance at the level of the project. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social and environmental concerns linked to the project. A three-tier common GRM will be followed as outlined in this resettlement plan. SEC representation in the GRC (third tier of GRM) as well as the involvement of 1-2 community members nominated by the community in the first level of the GRM (field level) will be ensured in Kuakata. Public awareness campaign will be conducted to ensure that awareness on the project and its grievance redress procedures is generated. The campaign will ensure that the poor, vulnerable including SEC and others are made aware of and are part of the awareness program. Grievance redress mechanism outlined in the draft resettlement plan will ensure that complaints and grievances are resolved in a collaborative, expeditious, and effective manner through dialogue, joint fact-finding, negotiation, and problem solving.

Resettlement Budget and Financing Plan: The costs are conservative estimates and will be confirmed during detailed project preparation and planning. The total resettlement cost for the contract package is **BDT 15,394,477**. PIU will issue order for release of payment to affected persons, which shall be released through electronic clearance service/National Electronic Fund

Transfer (ECS/NEFT) transaction from bank, through concerned treasury of LGED. Any affected persons not having bank accounts will be assisted by the project to open such accounts.

Institutional Setup: The Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) will be the Executing Agency. Project Management Unit (PMU) at the LGED will be headed by a Project Director (PD) who will be supported by two Deputy Project Directors (DPDs) overseeing safeguards and gender. The PMU level safeguard and gender team will have another three safeguard and gender personnel, Assistant Director (Environment), Assistant Director (Social Safeguards) and Assistant Director (Gender). For project implementation, two division level Regional Project Management Units (RPMUs) will be established, at Khulna and Barisal. Pourashavas are the implementing agencies of the project. The PMU will be supported by two institutional consultants under the supervision and control of Project Director, PMU: (i) the detail design consultants (DDC); (ii) the project management supervision consultants (PMSC), that will support PMU; and (iii) PMSC at the division level that will support the two RPMUs and the town-level PIUs. The PIUs will be established in each participating pourshava/ subproject town and staffed with a safeguards and gender focal person.

Monitoring and Reporting: RSECP implementation will be closely monitored to provide the PMU with an effective basis for assessing resettlement progress and identifying potential difficulties and problems. Monitoring will be undertaken by the PMSC, RPMUs and PMU. Monitoring will involve administrative monitoring to ensure that implementation is on schedule and problems are dealt with on a timely basis; socio-economic monitoring during and after any resettlement impact as well as impact on small ethnic community utilizing baseline information established through the detailed measurement survey of affected persons undertaken during subproject preparation, and overall monitoring.

I. INTRODUCTION

A. Background

1. The ADB supported Coastal Towns Infrastructure Environmental Infrastructure Project (CTEIP) in 10 coastal towns effectively commenced on September 2014 which will be completed on June 2022. As a continuity of the project ADB extended its support to Coastal Towns Climate Resilience Sector Project (CTCRSP) which will strengthen climate resilience and disaster preparedness in 22 (twenty-two) vulnerable coastal *pourashavas* (secondary towns) of Bangladesh. The towns were selected based on their vulnerability, population size, density, and level of past investments. The project takes a holistic and integrated approach to urban development and will (i) provide climate-resilient municipal infrastructure, and (ii) strengthen institutional capacity, local governance, and knowledge-based public awareness, for improved urban planning and service delivery considering climate change and disaster risks. Key infrastructure investments include (i) drainage, (ii) water supply, (iii) sanitation, (iv) cyclone shelters, and (v) other municipal infrastructure including emergency access roads and bridges, solid waste management, bus terminals, slum improvements, boat landings, and markets. Investments will benefit the poor and women. The Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) will be the Executing Agency. *Pourashavas* are the implementing agencies of the project.

2. Coastal towns are particularly at risk from the impacts of climate change due to high levels of poverty and limited capacity of *pourashavas* (urban local governments) to invest in resilience. The *pourashavas* lack resilient infrastructure, clubbed with haphazard urbanization, lack of stormwater drains, poor solid waste management system further worsens the condition of these towns. Most of the coastal towns are situated on the riverbanks of low-lying tidal zones at an average elevation of 1.0–1.5 meters (m) from the sea level¹ and coastal flooding is a key hazard faced by these towns. Inadequate basic municipal infrastructure to respond to increasing climate risk threatens both quality of life and the economic growth of coastal towns. This calls for an integrated approach for coastal town development that promotes risk-informed planning and investment for building resilience.

B. Project Description

3. The project will be aligned with the following impacts: higher and sustainable growth trajectories achieved in the face of the various weather-related natural hazards and risk and improved livability of coastal towns.² The outcome of the project will be climate and disaster resilience of coastal towns strengthened including benefiting the poor and women. The project directly supports to achieve project outcomes through three outputs.

4. **Output 1: Municipal infrastructure for resilience improved.** Output 1 will support to develop priority municipal infrastructure and essential services that are critical for improving climate and disaster resilience and local economic development in 22 project towns.³ Output 1

¹ Sowmen Rahman and Mohammed Aatur Rahman. Climate Extremes and Challenges to Infrastructure Development in Coastal Cities in Bangladesh. Volume 7, March 2015, Pages 96–108

² Government of Bangladesh, General Economics Division, Bangladesh Planning Commission Ministry of Planning. 2020. Making Vision 2041 a Reality – Perspective Plan of Bangladesh, 2021–2041. Dhaka.

³ Towns which are selected based on Climate Risk and Vulnerability Assessment screening process of 11 districts in coastal areas, are: Patuakhali, Bagerhat, Morelganj, Mehendiganj, Paikagacha, Kolaroa, Patharghata, Gaornadi,

includes: (i) EWCD friendly cyclone shelters constructed with early warning system; (ii) emergency access road to cyclone shelter upgraded or constructed; (iii) climate-resilient infrastructure for improved urban flood risk management such as stormwater drainages, nature-based solutions, water bodies restoration, and integrated waste management (IWM) developed; (iv) roads with stormwater drainages, bridges and culverts rehabilitated or constructed for improved connectivity and access to emergency services in the event of disasters triggered by natural hazards; (v) gender-responsive and socially inclusive urban public spaces improved; (vi) slum improvement program implemented; and (vi) EWCD-friendly sanitation facilities constructed for poor households. Output 1 will also support development of EWCD-friendly socio-economic infrastructures including (i) local markets; (ii) bus terminals; and (iii) other priority roads, bridges, culverts, and boat landing stations.

5. Output 2: Resilient livelihood enhanced. Output 2 will support to increase adaptive capacity of vulnerable households to deal with climate shocks in six project towns with high poverty levels through Graduation Approach. The Graduation Approach will build resilience of the vulnerable households through a sequenced and comprehensive set of interventions to place households on an upward trajectory from poverty.⁴ The key steps under the Graduation Approach include climate risk and localized market assessments to identify viable income generating activities; household skills and resource mapping; household level enterprise and employment matching; and tailored technical training along with asset provision to provide a holistic and resilient livelihood support. Output 2 includes: (i) climate vulnerable households covered in the graduation program in six project towns; (ii) women, including person with disabilities, reported increased skills for resilient livelihood; and (iii) inventory of productive assets of vulnerable households documented and insured.

6. Output 3: Institutional capacity, governance, and climate-awareness strengthened. Output 3 includes: (i) risk-informed urban development plans and poverty reduction action plans of project towns submitted to *pourashavas* council; (ii) staff of LGED and *pourashavas* including 90% eligible women staff reported increased knowledge on climate and disaster risk assessment to inform the urban development plans and to enforce development control regulations linked with natural hazards; (iii) knowledge and capacity of LGED and *pourashavas*' staff including 90% of women staff on nature-based solutions and green solution application developed;⁵ (iv) disaster management committee on disaster preparedness measures, cyclone shelter management committees, and standing committees on women and children affairs, poverty reduction and slum improvement in project *pourashavas* operationalized for improving municipal governance and sustainable service delivery;⁶ (v) revenues enhancement plan adopted by each project *pourashava* to improve municipal finance systems; (vi) computerized tax records and billing

Char Fasson, Borhanuddin, Betagi, Jahlokati, Muladi, Chalna, Banari Para, Bhedarganj, Shoruptathi, Lalmohon, Nalchiti, Zangira, Kuakata, and Bakerganj.

⁴ The four key pillars of the Graduation Approach are: (i) social protection through subsistence allowance and linkages to basic services; (ii) livelihood promotion through access to sustainable and resilient livelihoods; (iii) financial inclusion through access to formal savings mechanisms and financial literacy; and (iv) social empowerment for positive behavior change among families and communities.

⁵ Nature-based solutions promote actions to protect, sustainably manage and restore natural and modified ecosystems in ways that address societal challenges effectively and adaptively, to provide both human well-being and biodiversity benefits. (Source: IUCN (2020). Guidance for using the IUCN Global Standard for Nature-based Solutions. A user-friendly framework for the verification, design and scaling up of Nature-based Solutions. First edition. Gland, Switzerland: IUCN.)

⁶ A risk-informed performance-based budget allocation strategy will be adopted to promote governance-led infrastructure improvement to ensure sustainable urban services. The *pourashava* will need to fulfill a set of performance criteria to receive fund for infrastructure improvement. Performance criteria is elaborated in project administration manual (footnote 27).

systems made functional; (vii) annual gender responsive operation and maintenance (O&M) plans approved and at least 75% of the required annual budget is allocated and spent; and (viii) gender responsive and socially inclusive urban space guidelines developed. Output 3 supports to enhance public awareness, behavior change, and community mobilization in light of emergencies such as coronavirus disease (COVID-19) and cyclone Amphan in 2020. It will also support training and capacity building of LGED and *pourashavas* to institutionalize information technology-based remote monitoring through strengthening LGED's geographic information systems section, monitoring and evaluation unit, and project management unit.

7. The proposed CTCRSP is to be implemented in 22 *pourashavas* (local governments). District wise location of the CTCRSP towns is summarized in Table 1.

Table 1: District wise Pourashavas where Project (SCTEIP) will be Implemented

District	Town (Pourashava)	District	Town (Pourashava)
1. Barisal	1. Bakerganj	5. Bhola	1. Charfassion
	2. Mehendiganj		2. Lalmohan
	3. Banaripara		3. Borhanuddin
	4. Muladi	6. Jhalokathi	4. Jhalokathi
	5. Gouranadi		5. Nalchity
2. Bagerhat	6. Bagerhat	7. Satkhira	6. Kalaroa
	7. Morelganj	8. Khulna	7. Paikgacha
3. Patuakhali	8. Patuakhali		9. Pirojpur
	9. Kuakata	10. Barguna	9. Swarupkathi
4. Shariatpur	10. Zanjira	10. Barguna	10. Patharghata
	11. Bhedarganj		11. Betagi

C. Subproject Location

8. The Kuakata Town Roads subproject is located in Keranipara Rakhain Polli, Kuakata Pourashava in Patuakhali District. Kuakata is 350 kilometers away from Dhaka, and it is bounded to the north by the Upazila headquarter of Kalapara Upazila, to the south by the Bay of Bengal, to the east by the Patuakhali River and to the west by the Andhar Manik River.

9. **Population:** Information on population and number of households with average size of Kuakata Paurashava is presented in Table 2. According to BBS (2011), total population of Kuakata Paurashava is 9,177 (male 5,043 and female 4,134), sex ration is 122 and literacy rate is 57.6. There are altogether 155 people belonging to small ethnic communities (Rakhain 145, Chakma 6 and others 3) in Kuakata Paurashava, belonging to 41 households.⁷

Table 2: Kuakata Paurashava Population Data

Administrative Unit	Households (nos.)	Total Population	Average HH Size
Kuakata Paurashava	ad2,065	9,177	4.2
Ward No. 01	163	737	4.4
Ward No. 02	175	752	4.3
Ward No. 03	326	1,831	4.0
Ward No. 04	239	890	3.7
Ward No. 05	211	918	4.3
Ward No. 06	376	1,613	4.3

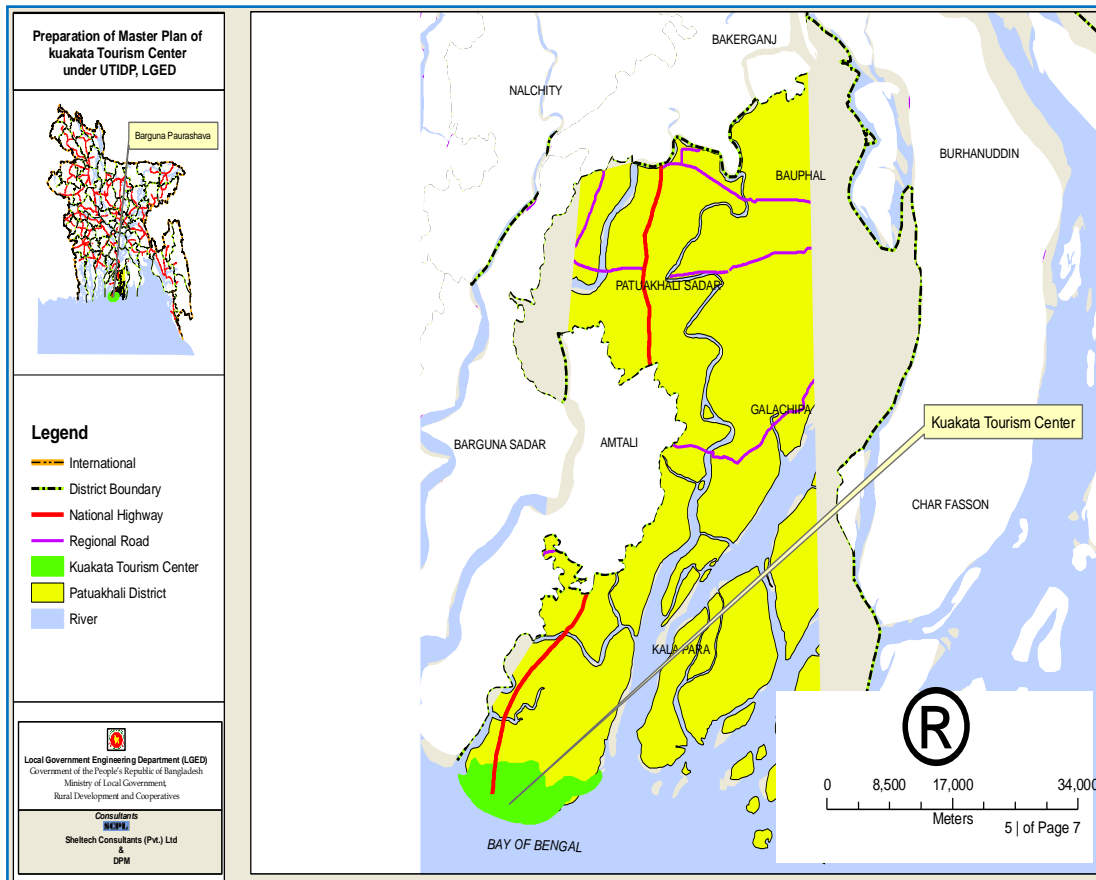
⁷ Community Report, Bangladesh Population and Housing Census 2011, Bangladesh Bureau of Statistics (BBS) Statistics and Informatics Division (SID) Ministry of Planning Government of The People's Republic of Bangladesh.

Administrative Unit	Households (nos.)	Total Population	Average HH Size
Ward No. 07	101	385	3.8
Ward No. 08	230	962	4.2
Ward No. 09	244	1,089	4.5

Source: BBS-2011, Community Series, Zila: Barisal

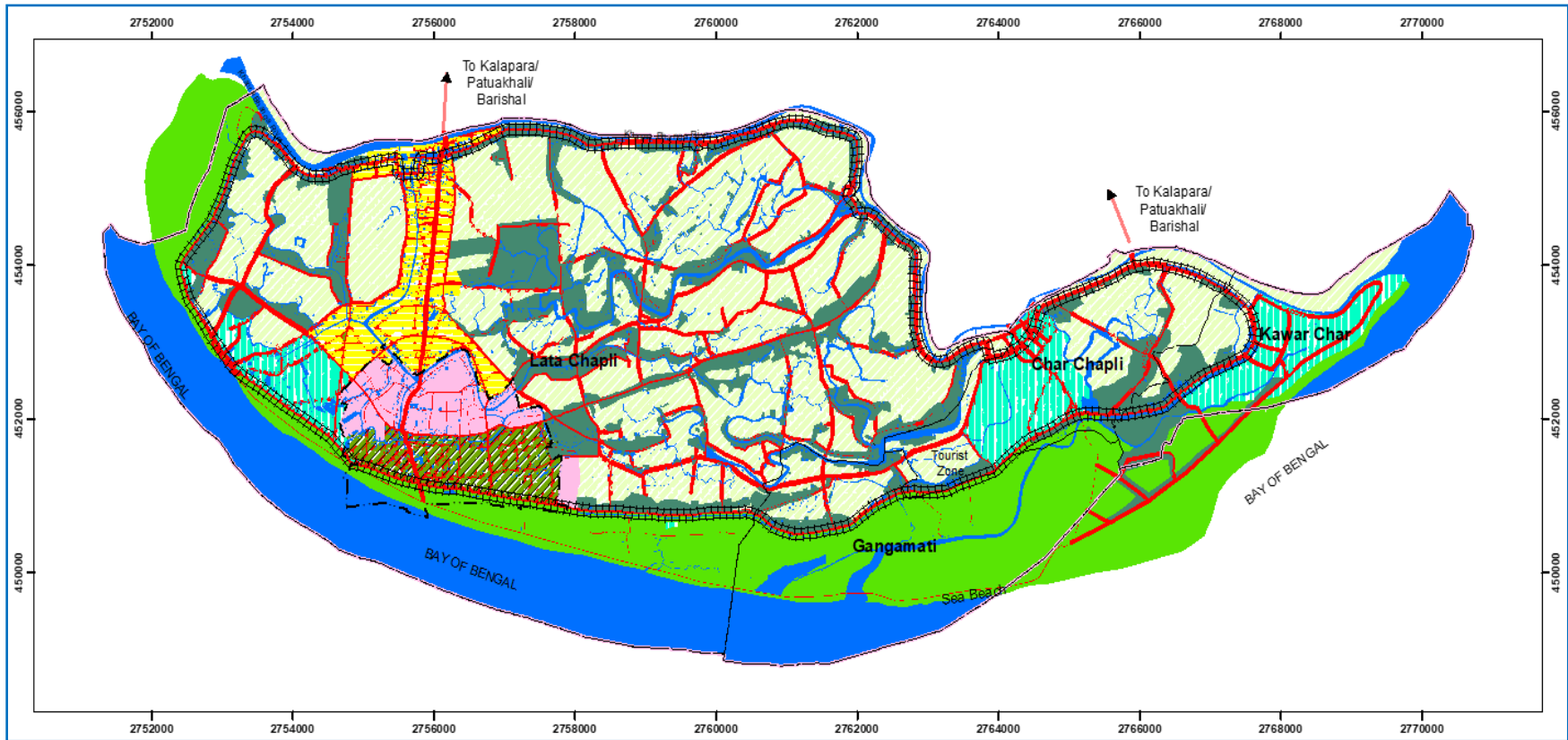
10. The roads construction/improvement will be implemented in existing road alignments within government-owned lands and are with existing rights-of-way (ROWs). Drainage will be provided alongside the roads. Figure 1 below shows the location of the subproject.

Figure 1: Location Map of Kuakata Town



Source: Kuakata Pourashava

Figure 2: Map of Kuakata Paurashava



Source: Detailed Engineering Design Report, December 2021

D. Existing Roads and Drains Conditions

11. The two roads for improvement under this subproject are earthen roads, with width of two meters. Moreover, there are no functional roadside drains along the alignments of this road. Currently, rainwater during monsoon season flows toward the sides of the road which have lower elevation and then flows to nearby canals or ponds. These canals or ponds only serve as rainwater conveyance, passageway, waterlogging areas during monsoon seasons and practically dry grassy ditches or fields during summer seasons. Figure 3 below shows the existing condition of the alignment.

Figure 3: Existing Condition of Alignments



E. Proposed Subproject Components

12. The Kuakata Town Roads subproject covers the improvement of existing two earthen roads with total length of 0.485 km including 0.495 km roadside drain work using reinforced cement concrete (RCC). The proposed subproject has been proposed under CTCRSP to provide an accessible, safe and climate-resilient roads in Kuakata town. Specifically, it will aim to improve the existing alignment of roads and therefore, provide fast and safe mobility to hospitals, markets, school and other places among the residents including the SEC population; will reduce the travel time and promote safety of all road users; and will help in evacuation of people and especially provide an access to road to SEC populations, elderly people due and other vulnerable groups during emergency due to climate change rise in storms surge, floods and sea rise level.

13. **Roads.** The total designed road length is 0.485 km where full length will be rigid pavement (cement concrete with temperature reinforcement-RCC), and with road width of 2.50 m. The level of the roads will be increase from approximately 3.3-3.8 meters to 4.1 meters.

- (i) Road 1- The proposed road is a new construction of raised and rigid concrete pavement of 373 m long, and 2.5 m wide and 4.10 m(PWD) formation level.
- (ii) Road 2- The proposed road is a new construction of raised and rigid concrete pavement of 112 m long, and 2.5m wide and 5.16m (PWD) formation level.

14. **Drains.** 0.495 kilometers of roadside drain work have been designed for the package. RCC will be used for the construction of the drains.

Table 3: Kuakata Roads Proposed for Development/Upgradation

SI No.	Road Name	Existing Feature	Length (m)	Proposed			Drain Details
				Width (m)	Type	Road side drain	
1	RD-01: Construction of RCC Road from Rakhain Para House Area (Barmis Super Shop to Hotel Friends Park House Via Madbar House. (Main Road Ch. 0+000 to 0+180), Link Road T-01 (Start Point Ch. 0+018 @ Main Road), (Link Road T-01 Ch. 0+020), Link Road T-02 (Start Point Ch. 0+069 @ Main Road), (Link Road T-02 Ch. 0+043), Link Road T-03 (Start Point Ch. 0+099 @ Main Road), (Link Road T-03 Ch. 0+045), Link Road T-04 (Start Point Ch. 0+160 @ Main Road), (Link Road T-04 Ch. 0+055), & Link Road T-05 (Start Point Ch. 0+042 @ Main Road), (Link Road T-05 Ch. 0+30), Ward No. #07.	Earthen Road. width 2.0m No existing drains	373.0	width 2.50 m	RCC	Drain 01 Length 180.0m, Drain link 01 Length 20.0m, Drain link 02 Length 43.0m, Drain link 03 Length 45.0m, Drain link 04 Length 55.0m, Drain link 05 Length 112.0m	Total Length of the Drain 455.0m, Width of the drain 1.0m, Depth of drain Varies from 0.910m to 1.202m (Covered box drain will be constructed beneath the RCC road)
2	RD-02: Construction of RCC Road from Nilanjona Road (Rakhain Field East Side) To WAPDA Very Bandh Road (Sea Queen Hotel). (Ch. 0+000 to 0+112), Ward No. #07.	Earthen Road. width 2.0m	112.0	width 3.8 m	RCC	Drain 02 Length 40.0m	Total Length of the Drain 40.0m, Width of the drain 1.0m, Depth of drain Varies from 0.729m to 0.740m

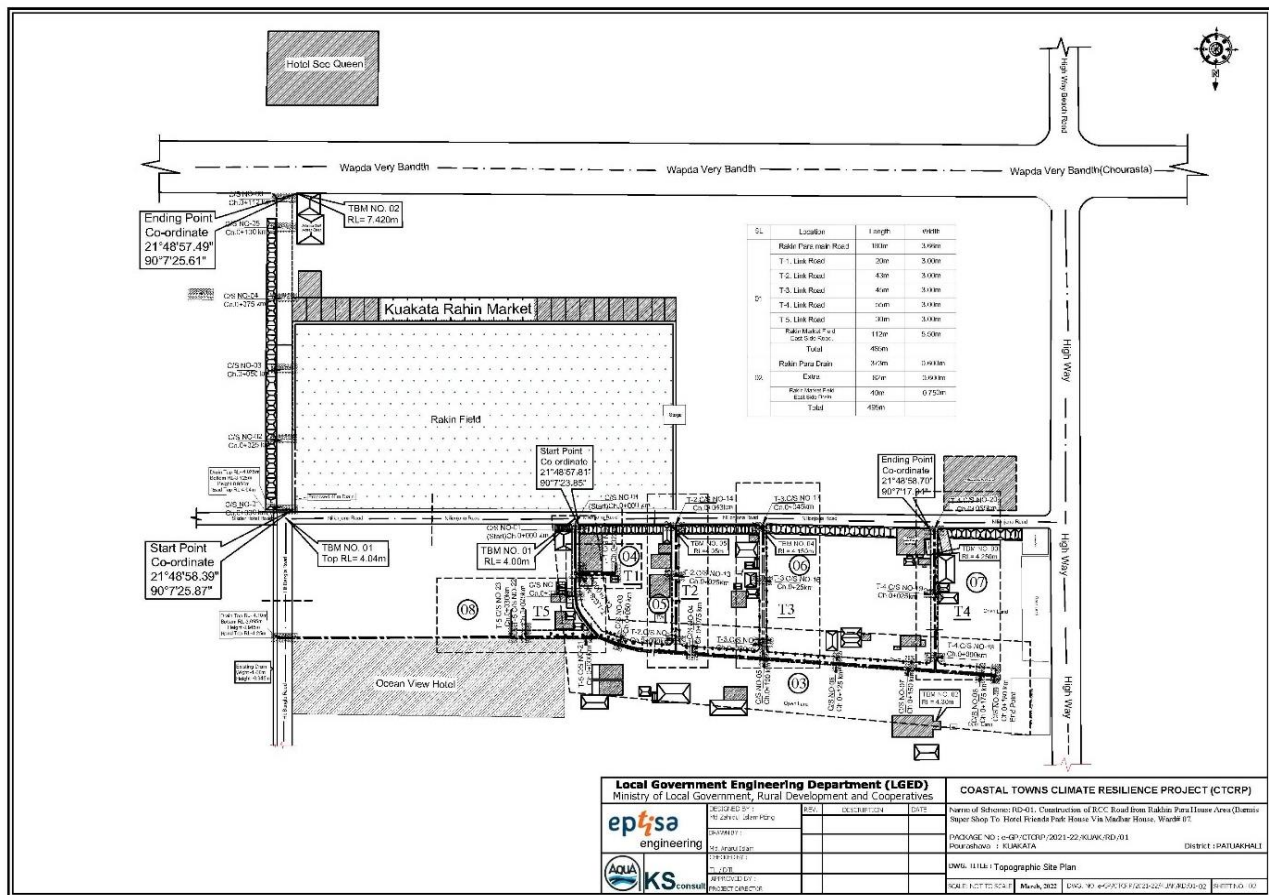
Sl No.	Road Name	Existing Feature	Length (m)	Proposed			Drain Details
				Width (m)	Type	Road side drain	
	Total Length of the Road		485.0	Total Length of the Drain			495.0m

Source: Detailed Engineering Design (DED) Report, December 2021.

15. Roads including road-side drain work to be constructed and/or rehabilitated under the subproject are considered using the following utilization factors:

- (i) leading to existing and proposed works, or any other establishment used as a shelter during disasters;
- (ii) used for key public safety and health care facilities for post-disaster response;
- (iii) critical for emergency evacuation during disasters;
- (iv) access for emergency services, and provision of post-disaster recovery and reconstruction goods (relief workers, food, medical supplies, etc.);
- (v) contributing to flood defenses and vulnerable areas;
- (vi) frequently inundated due to floods; and
- (vii) serving slum areas.

Figure 4: Site Layout of the proposed roads



Source: Detailed Engineering Design (DED) Report, December 2021

F. Objectives of Resettlement and Small Ethnic Community Plan

16. This draft Resettlement and Small Ethnic Communities Plan is prepared for the Kuakata subproject located in Patuakhali District under Coastal Towns Climate Resilience Sector Project, based on preliminary design. It addresses the potential involuntary resettlement impacts of the proposed subproject components, includes a specific action plan to enhance beneficial impacts to SEC and is consistent with the agreed resettlement framework and SECPF for the project, prepared in accordance with national laws and ADB SPS (2009) requirements for involuntary resettlement and Indigenous Peoples category B projects to meet the following objectives:

- (i) to ensure that the affected persons belonging to SEC groups receive culturally appropriate social and economic benefits;
- (ii) to ensure that when potential adverse impacts on the SEC are identified, these will be avoided to the maximum extent possible;
- (iii) to describe the identified scope and extent of land acquisition and involuntary resettlement impacts because of identified project components, and address them through appropriate recommendations and mitigation measures in the resettlement and small ethnic community plan;
- (iv) to present the socio-economic profile of the population in the project area, identify social impacts, including impacts on the poor and vulnerable, and the needs and priorities of different sections of the population, including women, poor and vulnerable;
- (v) to describe the likely economic impacts and identified livelihood risks of the proposed project components;
- (vi) to describe the process undertaken during project design to engage stakeholders and the planned information disclosure measures and the process for carrying out consultation with affected SEC people and facilitating their participation during project implementation;
- (vii) to establish a framework for grievance redressal for affected SEC persons that is appropriate to the local context, in consultation with stakeholders;
- (viii) to describe the applicable national and local legal framework for the project, and define the involuntary resettlement and indigenous peoples policy principles applicable to the project;
- (ix) to define entitlements of affected persons, and assistance and benefits available under the project;
- (x) to present a budget for resettlement and the specific action plan for SEC and define institutional arrangements, implementation responsibilities and implementation schedule for resettlement and small ethnic community plan implementation; and
- (xi) to describe the monitoring mechanism that will be used to monitor RSECP implementation.

17. The draft resettlement and small ethnic communities plan is prepared based on the available preliminary design for the subproject component. This document will be updated and reconfirmed for final involuntary resettlement impacts after completion of final design and detailed measurement surveys (DMS). The draft and final resettlement and small ethnic community plan will be reviewed and upon receipt of approval from ADB, disclosed on implementing agency and ADB websites and to the affected SEC persons facing involuntary resettlement impacts and/or beneficial impacts. Civil work will be taken up only after compensation payment to adversely affected SEC persons is completed, as per approved entitlement matrix. The implementing agency will be responsible for handing over the project land/site to the contractor free of any kind

of encumbrance. Implementation of the specific action plan for SEC will be monitored and reported in project semi-annual social monitoring reports.

18. **Measures to avoid and minimize the Involuntary Resettlement Impacts:** To avoid and minimize the involuntary impacts, the CTCRSP proposes to use the government lands wherever available and right-of-way (ROW) of roads owned by the government agencies for improvement/development of all the subproject components as mentioned in the project description. The roads are proposed to be constructed along existing available ROW of *Kaukata Pourashava* roads. The roads are proposed along the ROW of *pourashava* roads where there is presence of road-side shops/businesses, trees. Construction contractor will ensure prior consultation with the SEC groups residing beside and near the construction site and shops in the area. For the drainage component, the option of negotiated settlement is being considered, to avoid and minimize involuntary resettlement impacts.

19. The contractor will ensure to: (i) maintain the access to shops and residences or other buildings along the stretches where subproject roads are constructed, to institutions located close to proposed sites by providing pedestrian access through planks; and (ii) assistance to road-side business owners in case they need to be temporarily shifted, and ensure safety to passerby through hard barricading of excavated alignments/sites. Road construction work will be undertaken by the contractor in a culturally appropriate manner, taking into account the specific preferences and concerns of the community, if any, their religious festivals and beliefs.

20. Measures to be taken up by the contractor to avoid/mitigate economic impacts will include: (a) announcement of proposed civil works in advance (to enable shop owners to stock up and remain unaffected if goods vehicles are unable to reach them during construction), (b) provision of planks or space for pedestrian access; (c) careful timing of implementation, (d) minimizing construction period to the extent possible; (f) assistance to businessowners if any present during construction, to shift nearby; (g) signage with project details and contact details for grievance redress; and (h) proper traffic management. These measures will be part of the contract and will be implemented with careful monitoring by the concerned PIU.

21. The Project Implementation Unit (PIU) and the Regional Project Management Unit (RPMU) will also ensure that all the necessary rules related to safety and security of the public and residents are duly followed by the contractor. The actual dates of construction schedule with respect to rush hour, festival time, and special business days will be discussed with the residents, and accordingly construction activities will be planned.

II. SCOPE OF LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

A. Land Acquisition and Involuntary Resettlement

22. The scope of land acquisition and involuntary resettlement is identified based on the field visits to the subproject component locations and transect walk along the alignment of the roads and roadside drain works to be constructed. Most of the civil works are proposed within the boundaries or right-of-way of government lands. Although land donation or negotiated settlement (depending on the preferred method of the private landowners of two plots through which the outfall drain will pass) with third party oversight for drain alignment is envisaged for a small section from Rakhain Polli leading to the outfall. The two plot owners residing outside the SEC's compound will be given the option to choose either of the two modes – land donation or negotiated settlement. If the two owners are found to belong to SEC, voluntary donation will not be an option

and negotiated settlement will be the preferred option of the project. The proposed road works will be confined to the existing earthen pathway within the Rakhain Polli. 10 SEC homeowners along the road have also provided consent on the use, of small portion of land, about 2-3 feet, for the proposed road and drain improvement works. They were categorical that they do not want only road works, but also need drains. During consultation, the small ethnic community has signified their preference to provide right to use of the lands without ownership transfer to the project and therefore provided consent to use 2-3 feet of land along the proposed roads, for drain construction. The drainage construction along with road improvement in Rakhain Polli is built into the project design as the small ethnic community has expressed the need for such community infrastructure . Minutes of meeting of the consultation among Rakhain households is attached as Appendix 4. Nonetheless, the project has also provided option to the SEC households for negotiated settlement, whichever option the SEC families prefer. The process will follow the provisions in the resettlement framework, para 18 – 19, for negotiated settlement, if opted for. ⁸

23. As per preliminary design, the construction / improvement of the proposed road and drains through Rakhain Polli will not adversely impact the structures (residential and commercial), and common properties along the road. Nonetheless, as per baseline survey, two business owners will be temporary affected and likely to face temporary income loss during construction work, and four households will face loss of trees. The trees are mainly used for boundary demarcation and fencing purposes and any fruit or produce from the trees is used for own consumption by the respective household members, hence no significant impact is anticipated. Affected persons will be assisted and compensation will be paid for the period of disruption/income loss and tree loss as per the agreed entitlement matrix. The summary of involuntary resettlement impacts under the subproject is consolidated in Table 4 and further elaborated in subsequent paragraphs.

⁸ Both options will entail a legal agreement between the *Pourashava* and the SEC families, which will include their stated preference and any other conditions they may wish to include in such agreement. Negotiated settlement will however, entail transfer of ownership.

Table 4: Subproject Components and their Land Acquisition and Resettlement Impacts

Name of the Components	Project Impacts	Remarks
Improvement of existing two earthen roads with total length of 0.485 km including 0.495 km roadside drain work using reinforced cement concrete (RCC)	Temporary income loss to two business owner households and loss of 48 trees belonging to 4 households	Proposed civil works for roads will not require private land acquisition as it will be carried out in the existing roads while drainage works will mainly be on land that the Rakhain community has agreed to provide right to use without transfer. No significant impacts are anticipated. The additional length of drain connecting to the outfall will pass through the side of 2 privately owned plots, the owners of which are not yet identified and consulted. Proposed components are assessed to (a) cause temporary impacts (income loss) due to access disruption during construction of roads and roadside drains and loss of trees on the boundary of each house in Rakhain Polli, and (b) loss of <10% of 2 vacant privately owned plots through which the extended drain leading to outfall will pass. Project engineers have confirmed that the alignment will pass through the sides of these plots and the major portion of the plots will remain usable by the plot owners. Kuakata Pourashava proposes to obtain the extended length outside Rakhain Polli leading to the outfall through land donation or negotiated settlement (depending on the preferred method of the private landowners of the two plots), with third party oversight. The updated resettlement plan will include details of the landowners and their preferences, as well as third party certification of the transaction.

24. Road and drain works will be confined to the location of the existing selected roads and the available road right-of-way (ROW) additional 2-3 feet of land provided by the Rakhain community members along the road RoW, in recognition of their need for roads and drains in their settlement. Although the SEC houseowners have signified their interest to provide right to use 2-3 feet strips of land without ownership transfer, they will be provided with option for negotiated settlement, whichever is preferred by them. In order to link the drain to the outfall, an additional length of drain will also be required, which will pass through the sides of two privately owned plots affecting less than 10% of the total plot areas. The owners of these plots are yet to be identified and consulted. Such consultation and socioeconomic details of the plot owners will be included in the updated RSECP prior to contract award. As per design, the construction / improvement of the proposed road will not adversely impact the structures (residential and commercial), and common properties within the vicinity of the road and drains in Rakhain Polli. The plots outside

Rakhain Polli through which the drainage link to outfall is proposed are vacant and unused at present.

25. The involuntary resettlement impacts will be further assessed and revalidated based on finalization of detailed design and detailed measurement survey (DMS) will be conducted to update and finalize the RSECP accordingly. Rigour in data collection and consultations with local people will be required to ensure that all affected persons eligible for compensation are identified. The Contractor may consider adopting best engineering and construction practices to be implemented, as like using pre-cast drains,⁹ to minimize the period of disruption to the livelihood of the affected persons and general public. Efforts will be made by the Contractor to shift (if any) roadside temporary shops to an adjacent location (if possible) so that they can continue to with their livelihood activity. Summary of involuntary resettlement impacts is provided in Table 5.

Table 5: Summary of Involuntary Resettlement Impacts

Sl.No.	Project Impacts	Affected Persons	Remarks
1.	Permanent land acquisition	None for Rakhain Polli Outside Rakhain Polli: 10 m x 1 m land required, affecting owners of two plots (yet to be identified and surveyed, consulted)	(i) The project will utilize the existing roads which is within the right-of-way. 10 residents of Rakhain Polli (Ward Number 07) has expressed their preference to provide right to use of the lands without ownership transfer to the project to use 2-3 feet land on side of the road for road and drainage development. Consent is attached as an Appendix 4. The 10 residents will also be provided option for negotiated settlement and will be recorded in the updated RSECP. Of the 10 SEC households, four households will also face loss of trees (see row no.3). (ii) Pourashava will try to obtain the strip of land from two plot owners outside the Rakhain Polli, required for the drain through a negotiated settlement, with third party oversight. The number of affected households and their socioeconomic profiles will be included in the updated RSECP.
2.	Temporary Loss of Income due access disruption	Two households	Two roadside business shops will incur temporary income loss due to temporary access disruption of maximum of 20 days during construction on one road.
3.	Loss of Trees	Four households	The subproject will involve loss of 48 trees belonging to four affected households. Trees belonging to the affected families will be compensated in accordance with the provisions of the entitlement matrix. Please refer to Appendix 2 for details of loss trees

⁹ The contract document for the Contractor may contain suggestions to consider precast drains also.

Sl.No.	Project Impacts	Affected Persons	Remarks
4.	Number of Vulnerable Households	Six Households facing adverse, insignificant involuntary resettlement impacts (serial no. 2 and 3)	The two households affected by temporary income loss and four households who will lose their trees belong to the Rakhain community – a small ethnic community in Bangladesh. Therefore, all are considered vulnerable. Of the six adversely affected households, three of them are female-headed households/widows and one BPL. The proposed road improvement is anticipated to benefit 25 Rakhain community households (103 persons). It may be mentioned that the Rakhain have a matrilineal society and women have a good standing in the community, with property ownership rights.
5.	Average income/day (shops)	Average net daily income of the business owners from the affected business is calculated as BDT 722.	Average income/day (two business owners)

Source: Preliminary Survey, January 2022

26. **Small Ethnic Communities/ Indigenous Peoples.** As per Bangladesh Population and Housing Census 2011, 154 or 1.67% population out of the 9,177 total town's population are from the Rakhain community – a small ethnic community in Bangladesh. The proposed roads will be constructed at Kuakata town, within the area (plot number 3266) inhabited by the Rakhain community. There is a felt need among the Rakhain community for proper roads with drains for safe evacuation during cyclones and other natural disasters, allowing access to ambulances when required by community members and providing improved access and connectivity to markets, jobs, schools and health centers. All affected households facing involuntary resettlement impacts (temporary income loss and loss of trees) belong to Rakhain community. No direct or indirect impact to the dignity, human rights, livelihood systems or natural or cultural resources of Rakhain community, is anticipated. The impact to the community will be mostly beneficial, and the proposed road improvement is anticipated to benefit 25 Rakhain community households (103 family members). Since impact to SEC is assessed, a specific action plan for enhancement of project benefits to the affected small ethnic community is prepared in this RSECP in line with the project's Small Ethnic Communities Planning Framework (SECPF) (para 25).

27. Efforts will be made by the implementing agency to provide access for continuation of the livelihood and daily activities (e.g. access to schools, jobs, markets) of the affected SEC. In order to mitigate negative impacts on SEC persons, before and during the subproject design, implementation, as well as monitoring process, the project staff will enhance the dissemination of project information and conducting meaningful consultation especially with SEC persons to ensure that they get the maximum benefit from the advantage conditions brought by the subproject and fully understand their entitlements under this RSECP. No civil works will be allowed in sections of impact until compensation payment is completed. Social safeguard requirements are included in the EMPs and bid documents. Road and drainage construction work will be undertaken in a culturally appropriate manner, taking into account the specific preferences

and concerns of the community, if any, and in consideration of their religious festivals and communal activities.

28. **Specific Action Plan.** Further, to enhance project benefits to SEC, ensure culturally appropriate project implementation, address any potential safeguards issues and ensure inclusion, a specific action plan for indigenous peoples/small ethnic community is proposed for this subproject. The action plan will carry out the following specific activities: (i) a baseline survey¹⁰ will be conducted to enable tracking of benefits to small ethnic households within the project influence area; (ii) proposed benefits (e.g. access to roads) to SEC households will be shared and monitored; (iii) IEC materials, information sharing, consultations and other activities stated in the CAPP will be culturally sensitive and appropriate when implemented; (iv) the chief of the tribe or a member of the tribal council as traditional arbitrator (to ensure that traditional grievance redress systems are integrated) and an NGO/CSO working with SEC will be special invitees, when required. GRC will also ensure that grievance redress established is gender inclusive in receiving and facilitating resolution of the SEC concerns; (v) consultations with SEC households will be conducted in all subproject stages which shall help in identifying any culture-specific requirements and traditions like avoidance of any specific festival days, and/or other activities with cultural significance to the SEC communities during civil work; and any other SEC related issues and concerns that may be of importance to the community. An end-line sample survey will be conducted to document the views of SEC households about subproject benefits.¹¹ Such survey is in line with subproject internal monitoring. The proposed action plan with activities, timelines and responsibilities is attached in **Appendix 5**. This action plan will be used for project monitoring to ensure that SEC/IP activities are undertaken on a timely basis and reported semi-annually and to determine whether project objectives have been achieved.

III. SOCIO-ECONOMIC INFORMATION AND PROFILE

29. This section presents the socio-economic profile and information of the affected households due to the proposed works. The results are based on information collected from two affected business owners (affected by temporary income loss) and four households in Rakhain Polli affected by tree loss identified during walk-through survey along the alignment of the road. The survey provides information on the socio-economic conditions of affected households in Rakhain Polli based on initial design. Please refer Appendix 2 and 3. The census survey will be further revalidated upon finalization of design and during detailed measurement survey. Profile of the private owners of the two affected plots (vacant land) outside Rakhain Polli through which the drainage will pass before reaching the outfall drain is not included in this RSECP as the owners are not yet identified. The socioeconomic and vulnerability profile of the owners of these plots will be presented in the updated RSECP, prior to contract award. No significant impacts to the two plot owners outside Rakhain Polli is anticipated.¹²

¹⁰ Contractors will conduct information and dissemination campaigns across the project coverage area and will be responsible to ensure that SEC households and localities are identified and included in the campaign. Data on exact number of small ethnic community households can be generated from the survey to be conducted by the project contractor prior to start of civil work. Cost for such activity is already included in the contract document for the subproject.

¹¹ Costs towards conducting end-line sample survey is included in the subproject budget table. Sample size may be decided by the Project in consultation with ADB.

¹² Assessments were done based on the preliminary design for the proposed subproject components based on a 100% socio-economic survey for the alignment passing through Rakhain Polli. Revalidation of the socio-economic survey will be conducted following the finalization of the design and will be updated during DMS, and the RSECP will be updated accordingly. Similarly, the plot owners outside Rakhain Polli will be identified and surveyed and

30. **Distribution of households heads.** Table 6 presents the sex-wise distribution of affected household heads. Based on the information collected, of the six affected households, three are female-headed households and the other three are male-headed households (total household members: 12 males and 12 females).

Table 6: Distribution of Household Heads by Sex

S. No.	Type of Households	No.	%
1	Male-Headed	3	50%
2	Female- Headed	3	50%
	Total	6	100

Source: Socio-economic Survey, March 2022

31. **Religion and Ethnicity.** The socioeconomic survey of the heads of the affected households indicated that they all belong to Rakhain community which is a small ethnic community in Bangladesh but the SEC households are all practicing Christianity as their religion.

Table 7: Affected Households by Religion

S. No.	Type of Religion	No.	%
1	Rakhain Christian	6	100%

Source: Socio-economic Survey, March 2022

32. **Occupation.** Table 8 shows occupation of the household heads. It was found out that five of the six affected households are into business- two of them are owners of the roadside shops that will be impacted during construction, while one affected household head is a housewife.

Table 8: Affected Households by Occupation

S.No.	Occupation	No.
1.	Business	5
2.	Housewife	1
	Total	6

Source: Socio-economic Survey, March 2022

33. **Educational Status.** Among the six affected households heads, two have completed primary education, two households heads reached secondary education, one has a bachelor's and one household head has a Higher Secondary School Certificate.

34. **Income.** Table 9 shows the distribution of households by income. Income level of two affected households is BDT 280,000 annually, two households earned BDT 240,000 annually, while the remaining two households earned BDT 480,000 and 150,000, respectively.¹³

socioeconomic details included in the updated RSECP, prior to contract award. Approval from ADB on the updated RSECP will be sought prior to contract award.

¹³ The upper poverty line for urban area from the 2016 upper poverty line determined by the Bangladesh Bureau of Statistics (BBS), with added inflation rate 5.32 (Source: Consumer Price Index (CPI), Inflation Rate and Wage Rate Index (WRI) in Bangladesh, Bangladesh Bureau of Statistics (BBS), February 2021). The upper poverty line for the year 2016 for urban area is BDT 2,929 [source: Report on Household Income and Expenditure Survey 2016, published on October 2017 (latest publication) by Statistics and Information Division, BBS]. Thus, BPL definition for urban metropolitan is BDT 3,085 per capita/month in 2021. As such, the per capita average monthly household income under BPL stands at BDT 12,340 {BDT 3,085 X 4 (HH size) =12,340}.

Table 9: Annual Income Level of Households

Income (Yearly in BDT)	No. of Households
150,000	1
240,000	2
280,000	2
480,000	1
Total	6

Source: Socio-economic Survey, March 2022

35. **Vulnerability.**¹⁴ Based on the findings of the socioeconomic survey, all six households belong to small ethnic community (Rakhain) and therefore all fall under the vulnerable category. Four affected households have multiple vulnerabilities being female-headed households and below the poverty line as shown in the table below.

Table 10: Vulnerability

S.No	Vulnerable Households by Category	No.
1.	Small ethnic community/Indigenous Peoples	6
	With Multiple Vulnerabilities	
	i. SEC/WHH/Widow	3
	ii. SEC/BPL	1

Source: Socio-economic Survey, March 2022

IV. CONSULTATION, PARTICIPATION AND DISCLOSURE

A. Consultation

36. A range of formal and informal consultative methods will be carried out for all subprojects including, but not limited to: (i) focus group discussions (FGDs); (ii) public meetings; (iii) community discussions; and (iv) in-depth and key informant interviews, in addition to the censuses and socioeconomic surveys and individual meetings. Consultations will be held with special emphasis on vulnerable groups. Encouraging public participation in consultations informs the public of the program and serves as a venue for the public to express their opinion on priorities which the program should address. Consultations and other field-based activities like surveys and were undertaken with full adherence of the COVID-19 safety protocols. The project has also developed a survey safety protocol on COVID-19 to be followed by the CTCRSP team attached in Appendix 11.

37. The key stakeholders to be consulted at various stages during subproject preparation, RSECP implementation, and program implementation includes:

- (i) all affected SEC persons facing involuntary resettlement impact, including households with multiple vulnerabilities; all SEC persons facing beneficial impacts;
- (ii) program beneficiaries;
- (iii) elected representatives, community leaders, and representatives of community-based organizations;

¹⁴ Vulnerable households comprise below poverty line households, female-headed households, households with out of school/working children, disabled person-headed household, elderly-headed household, landless household, household with no legal title / tenure security, and households belonging to small ethnic communities.

- (iv) local NGOs/CSOs;
- (v) local government and relevant government agency representatives; and
- (vi) Project staff of LGED, PMU, *pourashava* level PIU, PMSC, DDC and contractor.

38. This RSECP is prepared in consultation with the stakeholders. Meetings, focused group discussions and individual interviews were held by involving the project stakeholders. Consultations have been made with the people of the locality along with the *Pourashava* personnel and related authorities.

39. Consultations with affected persons during resettlement plan preparation will ensure that views of affected persons on compensation and resettlement assistance measures are fully incorporated while consultations conducted during resettlement plan implementation will identify any additional support or help required by affected persons during rehabilitation.

40. Continued involvement of those affected by subprojects is necessary in the RSECP and project preparation, implementation and monitoring process. The PIU will ensure that affected SEC persons and other stakeholders are informed and consulted about the subproject, its impact, their entitlements and options, and allowed to participate actively in the development of the subproject. This will be done particularly in the case of vulnerable affected persons, who will be encouraged to choose options that entail the lowest risk. This exercise will be conducted throughout the subproject—during preparation, implementation, and monitoring of subproject results and impacts. *Pourashava* level PIU through monitoring support will ensure that stakeholder consultation, participation and information disclosure activities are carried out in project area through the project cycle.

41. All consultations will be organized by *pourashavas*/ PIU level social safeguards officers. The safeguard officers appointed by the *pourashava*, with assistance from DDC social safeguard specialist (SSS), will prepare detail consultation and disclosure plan and carry on consultation and disclosure of the entitlement package accordingly. Social safeguard officer, PIU will be responsible for conducting/ arranging participatory consultation and disclosure meetings in such a manner that the affected persons and the stakeholders at community level will feel free to express their views without coercion, fear or hesitation. If there is any change in project design in sites or alignment depending on inputs of the consultation process these will be made known to the affected persons. Participatory consultation with the affected persons will be documented and appended to the respective resettlement plan containing consultation meeting details, minutes of the meetings, list of participants.

42. **Public Consultation.** Public consultation with the stakeholders has been conducted to understand the local issues and public views including possible impact of the project. The issues like, awareness and extent of the project and development components, benefits of project as well as community, labour availability in the project area or requirement of outside labour involvement, local disturbances due to project construction work, access and drainage problem, and any sensitive area nearby the project road sites. The project information, its benefits, social and environmental impacts were also explained to the community. The participants were encouraged to be open and make known their issues and concerns. The presentation highlighted the project background, objectives, expected upcoming activities, social economic information, and environmental information. After the presentations, the community was given opportunity to give their views, comments and queries. Comments or questions raised by stakeholders were responded to. The consultant explained that positive and negative impacts of the project on people and the environment will be analysed such as air pollution, dust, influx of people, employment. All the participants confirmed that they appreciate the Project. The project received

high degree of acceptability, which according to the Rakhain community members will help in providing access to road particularly during emergency situation and during disaster period. The drainage component will save their houses and properties from flooding. Participants' specific concerns and corresponding responses from the facilitators discussed in the meetings during RSECP preparation are briefly presented in Table 11 below.

Table 11: Summary of Public Consultation

01	Question	What is the construction plan of the proposed Roads?
	Answer	Proposed Roads will be 3.00 m wide road with rigid/flexible pavement including road side drain also.
02	Question	What is role and responsibility for construction and operations
	Answer	Pourashava will play role as implementing agency in construction, operation and maintenance of the proposed cyclone shelter in the Pourashava area
03	Question	How will Pourashava support cost for major maintenance
	Answer	This is the responsibility of the Pourashava to manage required fund for repair and maintenance, as well as logistics during disaster period for realizing development objective of this project
05	Question	What will be the criteria for labour recruitment during construction?
	Answer	This largely depends on the types of job and will be assessed on a case to case basis by the contractor according to needs.
05	Question	Priority for jobs should also consider women; women can do the same work.
	Answer	Priority will include women and there will not be any discrimination.
06	Question	Raised the issue of employment, he suggested that the local people should be the first ones to be employed in the project.
	Answer	The consultant team explained that local people will be employed accordingly to job requirement.
07	Question	Wishes to speed up the project.
	Answer	It was explained that implementation will take place immediately after the rainy season.
08	Question	The construction creates lot of dust and noise, is there any increase anticipated.
	Answer	The increase in dust and noise will be at construction site and all mitigation measures will be put in place by the contractor

43. **Focus group discussions.** Focus Group Discussions (FGD) were also conducted for the proposed roads on 31 January 2022 at the existing road attended by 15 local people (Male-12 and Female-3). The objective of the FGD was to further apprise the stakeholders about the current progress of the subproject and to reiterate environmental and social impacts of the proposed subproject and safeguards to mitigate the same. Comments or questions raised by the group were discussed until they were satisfied with the level of information provided. Photographs and documentation of the FGDs are provided in Appendix 10.

44. Key issues discussed were similar to those already voiced during the community consultation meetings and included:

- (i) Community benefits as a result of the road schemes;
- (ii) Resettlement and social issues compensation and mitigation measures according to Resettlement Framework and SECPF;
- (iii) Participation of local community during the construction phase;
- (iv) Roles and responsibilities of different stakeholders for realizing desired outcome;
- (v) Potential social and economic impacts of the proposed road construction/ improvement.
- (vi) Awareness of the local community about the proposed roads;

- (vii) Opinion of the local people about its need;
- (viii) Community support and participation;
- (ix) Construction and maintenance of the roads;
- (x) Participation of local people for construction and maintenance work

45. Information will be disseminated to affected persons at various stages. In the sub-project initiation phase, the Assistant Director, Social Safeguard, PMU supported by Assistant Director Social Safeguard, RPMU and concerned *pourashava* level PIU and DDC will be responsible to intimate the community and the affected persons about the sub-project along with program information/details. The resettlement framework, SECPF and subproject resettlement plan/RSEP will be made available in relevant government agencies at district level including the *pourashava* office in each town, near affected area, and PIU and PMU offices. The resettlement framework, SECPF and sample subproject resettlement plans/RSECP (both draft and final versions) will be disclosed in ADB's website and the LGED, PMU websites.

46. Information dissemination, through subproject specific leaflets (in local language Bengali) and public announcements, and consultation will continue throughout program implementation. The project leaflets will be distributed by community mobilisers to the affected communities for their information. The subproject cut-off-date will be established upon the completion of final detail design, detail measurement survey (DMS) and census of affected person. The subproject cut-off-date will be informed to the affected persons directly, through dissemination of project leaflets, public announcements in the local media, as well as stated in the project sign boards. A sample project leaflet is attached in **Appendix 7**.

47. The PIU/RPMU/PMSC social safeguards personnel will be entrusted the task of ensuring ongoing consultations and public awareness program during project implementation. This task will be carried out in coordination with the PIU, detailed design consultant, PMSC and contractors to ensure the communities are made fully aware of project activities in all stages of construction. A community participation action plan will be prepared by Assistant Director, RPMU in consultation with *pourashava*/PIU. The community in general and the affected families, will be consulted and made aware of the civil works under project activities prior to construction and about ADB policy of involuntary resettlement.

48. An intensive information dissemination campaign for affected persons will be conducted by the PIU with assistance from RPMU and DDC at the outset of resettlement plan implementation. All the comments made by the affected persons will be documented in the subproject records and summarized in subproject monitoring reports. A summary of consultation and disclosure activities to be followed for each subproject is in Table 12.

Table 12: Summary of Consultation and Disclosure Activities

Subproject Phase	Activities	Details	Responsible Agency
Subproject Initiation Phase	Mapping of the subproject area	Subproject area to be mapped, clearly showing survey numbers of titleholders of land/property proposed for acquisition	Project implementation unit (PIU) in co-ordination with local land revenue office, under the overall supervision of the Project management unit (PMU).
	Stakeholder identification	Cross section of stakeholders to be identified in order to facilitate their	PIUs, under the overall supervision of the PMU

Subproject Phase	Activities	Details	Responsible Agency
		participation in the sub-project.	
	Subproject information dissemination; Disclosure of proposed land acquisition and sub-project details	Leaflets containing information on sub-project to be prepared. Public notice will mention the names and survey nos. of titleholders of land/property proposed for acquisition along with sub-project details. Notice will be issued in local newspapers. Web disclosure on website also proposed.	PIUs in coordination with local land revenue office will be involved in information dissemination, under the overall supervision of the PMU. PIUs will be assisted by consultants for leaflet preparation. Notice will be issued from the Deputy Commissioner's office. Executing agency to post notice on its website.
	Stakeholder Meetings	Meetings at community/ household level with titleholders of affected land/property and their family members during project scoping.	PIUs with officials from Deputy Commissioner's/ Land Acquisition office/ <i>pourashva</i> officials will facilitate meetings to disclose the information to each affected person.
RSECP Preparation Phase	Disclosure of cut-off-date	For land acquisition, Section 4 Notice under ARIPA, 2017 and for nontitle holders (NTHs) start date of DMS and census survey is cut-off-date.	Section 4 notice under ARIPA, 2017 will be published by Deputy Commissioner's Office. PIU with the support of DDC social safeguard specialist will inform the NTHs.
	Social impact assessment surveys	Resettlement framework will be made available in Deputy Commissioner/ Land Acquisition office and PMU office/ PIU office at <i>pourashva</i> level, to be translated in local language, Bengali	PMU/RPMU/PIU will ensure the availability of resettlement framework.
	Formulating compensation measures and rehabilitation measures	Conducting discussions/ meetings/workshops with all affected persons and other stakeholders	PIUs under overall supervision of PMU will conduct all required discussions/ meetings/ workshops and will invite all primary and secondary stakeholders.
	Disclosure of final entitlements and rehabilitation packages	Web disclosure of the resettlement plans. Circulating Copies of resettlement plans to all stakeholders including affected persons, translating summary resettlement plan in local language before conducting final disclosure	PIU will undertake all activities related to circulation of resettlement plan. PIU will arrange public meeting of all stakeholders with affected persons for resettlement plan approval. The PIU and RPMU safeguard personnel will

Subproject Phase	Activities	Details	Responsible Agency
		meeting. Conducting public meetings for resettlement plan approval by affected persons.	document all the comments and suggestions made by affected persons and will send it to the PMU along with the resettlement plan.
RSECP Implementation Stage	Disclosing final RSECP approved by ADB to all important stakeholders	Final RSECP reviewed and approved by ADB, to be updated/disclosed on the implementing agency/ executing agency's website. The final plan will be disclosed to affected persons and other stakeholders. Ensuring the availability of copy of the approved resettlement plan and ADB involuntary resettlement policy at PMU, PIU, <i>pourashava</i> and Deputy Commissioner's office.	Executing agency/PMU/RPMU and PIUs
	Consultation with Affected persons during RSECP implementation	Meetings/discussions will be arranged with affected persons. Affected households to be identified those who will require rehabilitation assistance.	PIUs will arrange required meetings/ discussions. Social safeguard personnel from PMU, RPMU and PIUs will participate, while PMSC social safeguard consultant will monitor the consultation activities.

DDC = detail design consultants; PIU = project implementation unit; PMSC = project management supervision consultant; PMU = project management unit

V. GRIEVANCE REDRESS MECHANISM

49. A project-specific grievance redress mechanism (GRM) will be established to receive, evaluate, and facilitate the resolution of affected person concerns, complaints, and grievances about the social and environmental performance at the level of the project. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social and environmental concerns linked to the project. Assessment of the GRM designed and implemented for Coastal Towns Infrastructure Environmental Infrastructure Project (CTEIP) shows that the system is effective in timely resolution of grievances in a transparent manner. The arrangements under CTEIP is appropriately adjusted to accommodate the change in institutional arrangements under SCTEIP.

50. **Common GRM.** A common GRM will be in place for social, environmental, or any other grievances related to the project; the resettlement plans (RPs), RSECPs and IEEs will follow the GRM described below, which is developed in consultation with key stakeholders. The GRM will provide an accessible and trusted platform for receiving and facilitating resolution of affected persons' grievances related to the project. The multi-tier GRM for the project is outlined below, each tier having time-bound schedules and with responsible persons identified to address grievances and seek appropriate persons' advice at each stage, as required.

51. Across *Pourashava* public awareness campaigns will ensure that awareness on grievance redress procedures is generated through the campaign. The project implementation unit (PIU) under the guidance of Assistant Director RPMU will conduct *pourashava*-wide awareness campaigns to ensure that poor and vulnerable households are made aware of grievance redress procedures and entitlements and will work with the PIU safeguards assistant to help ensure that their grievances are addressed.

52. Affected persons (APs) will have the flexibility of conveying grievances/suggestions by dropping grievance redress/suggestion forms in complaints/suggestion boxes that will be installed by project *pourashavas* or through telephone hotlines at accessible locations, by e-mail, by post, WhatsApp or by writing in a complaints register that will be kept in *pourashava* offices. **Appendix 8** has the sample grievance registration form. Careful documentation of the name of the complainant, date of receipt of the complaint, address/contact details of the person, location of the problem area, and how the problem was resolved will be undertaken. The Assistant Directors from project management unit (PMU), RPMU and Project Implementation Unit (PIU) will have the overall responsibility for timely grievance redressal on environmental and social safeguards issues and for registration of grievances, related disclosure, and communication with the aggrieved party.

53. **Grievance redress process.** In case of grievances that are immediate and urgent in the perception of the complainant, the Social Coordinator, Contractor and Social Safeguard and Environment Specialist from the project management and supervision consultants (PMSC) on-site will provide the most easily accessible or first level of contact for quick resolution of grievances. Contact phone numbers and names of the concerned PIU safeguards assistant, contractors, PMU safeguards officer, PMSC environmental and social safeguards specialists will be posted at all construction sites at visible locations.

54. **1st Level Grievance, *Pourashava* Level PIU.** The contractors, PIU Safeguard and Gender Focal person can immediately resolve issues on-site or at *pourashava* level in consultation with each other with the support of Administrative Officer of *Pourashava*, designated municipal ward councillor and will be required to do so within 7 days of receipt of a complaint/grievance. Assistance of ward level coordination committees (WLCC) will be sought if required for resolution of the issue, by any one or all of them jointly. The first level grievance redress team will comprise of the following members:

- (i) Chief Executive Officer or in his absence *Pourashava* Secretary
- (ii) Executive Engineer, *Pourashava* (Safeguard and Gender Focal person)
- (iii) Administrative Officer, *Pourashava*
- (iv) Municipal Ward Councilor (designated)
- (v) EHS Supervisor/Social Coordinator, Contractor

55. The town-level grievance redress team shall have at least one women member. In addition, for project-related grievances, representatives of affected persons, community-based organizations (CBOs), and eminent citizens must be invited as observers in GRC meetings. In case of any impacts on small ethnic communities (SECs), in subproject towns (example: Kuakata), the grievance redress team must have representation of the affected SECs, the chief of the SEC group as traditional arbitrator (to ensure that traditional grievance redress systems are integrated) and/or an NGO working with SECs.

56. **2nd Level Grievance, RPMU, Division Level.** All grievances that cannot be redressed within 7 days at PIU level will be brought up to the RPMU level. Second level grievance redress

team headed by the Deputy Project Director, RPMU supported by the Assistant Directors (environment, social safeguard and gender) and Construction Supervision and Safeguards Engineers /Asst. Supervision and Safeguards Engineers, PMSC will attempt to resolve the grievance /complaint within 7 days. At the RPMU level, the composition of 2nd level grievance redress team will be as follows:

- (i) Deputy Project Director
- (ii) Assistant Director (Environmental Safeguards)
- (iii) Assistant Director (Social Safeguards)
- (iv) Assistant Director (Gender) *supported by* Construction Supervision and Safeguards Engineers /Asst. Supervision and Safeguards Engineers, PMSC

57. **3rd Level Grievance, PMU Level.** All grievances that cannot be redressed within 7 days at RPMU level will be brought up to the PMU level. The RPMU safeguards team will refer any unresolved or major issues to the PMU level grievance redress team, that will be headed by the Project Director and will have Deputy Project Director, social safeguard, environment safeguards and gender Assistant Directors and PMSC, who will resolve the complaints/grievances within 15 days. The PMU level grievance team will comprise of:

- (i) Project Director, PMU
- (ii) Deputy Project Director (Safeguards)
- (iii) Assistant Director (Environment)
- (iv) Assistant Director (Social Safeguards)
- (v) Assistant Director (Gender) *supported by* Social, Environment and Gender Specialist, PMSC
- (vi) women representative from a Civil Society Organization (CSO), local elected representative (if required), and representative from small ethnic community¹⁵

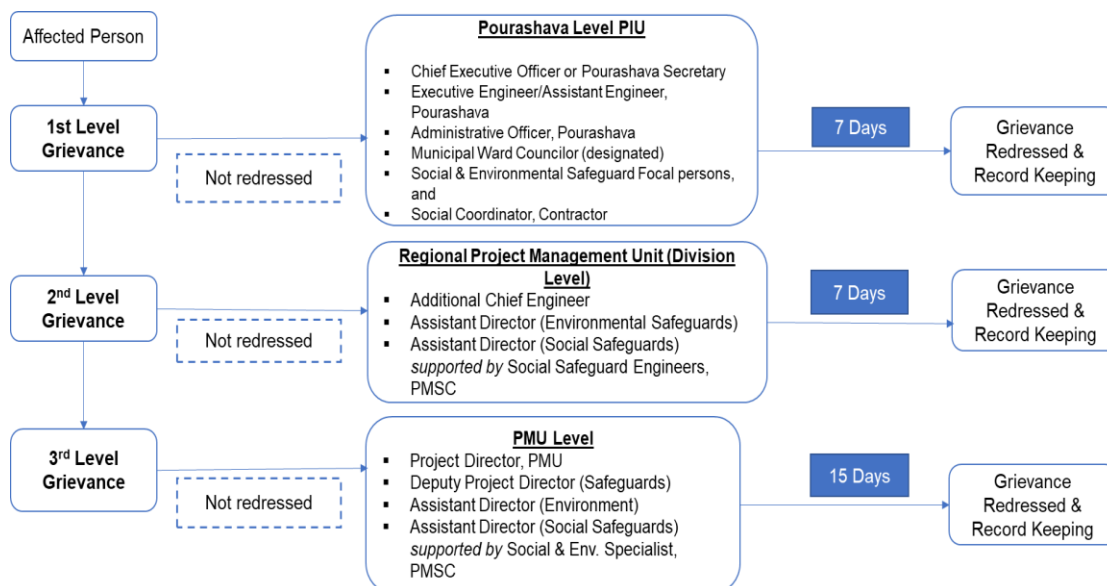
58. The grievance redress process is represented in Figure 5.

59. Despite the project GRM, an aggrieved person shall have access to the country's legal system at any stage and accessing the country's legal system can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

60. In the event that the established GRM is not in a position to resolve the issue, the affected person also can use the ADB Accountability Mechanism (AM) through directly contacting (in writing) the Complaint Receiving Officer (CRO) at ADB headquarters or the ADB Bangladesh Resident Mission (BRM). Before submitting a complaint to the Accountability Mechanism, it is necessary that an affected person makes a good faith effort to solve the problem by working with the concerned ADB operations department and/or BRM. Only after doing that, and if they are still dissatisfied, will the Accountability Mechanism consider the complaint eligible for review. The complaint can be submitted in any of the official languages of ADB's developing member countries. The ADB Accountability Mechanism information will be included in the project-relevant information to be distributed to the affected communities, as part of the project GRM.

¹⁵ Small ethnic community representation at GRC 1st level (town level) and 3rd level (PMU level) will be ensured in case of any small ethnic communities/ indigenous peoples impacts (positive or negative) is assessed in the project area – this is applicable to Kuakata subprojects. The representative from small ethnic community can be a leader of SEC groups, or representative suggested by the SEC themselves, and/or a representative member of a CSO working with the SEC, to be decided by PMU. Representation of 1-2 community members nominated by the community in the first level GRM arrangement is also proposed in Kuakata, for smooth implementation of the project roads passing through the Rakhain settlement and quick resolution of issues.

Figure 5: Grievance Redress Process



GRC = grievance redressal committee; PIU = project implementation unit; PMSC = project management and supervision consultants; PMU = project management unit

Note: In case of project towns where impacts to SEC are assessed, the PIU-level grievance redress committee/team will have representation of the affected SECs.

61. **Record keeping.** Records will be kept by PIU of all grievances received, including contact details of complainant, date the complaint was received, nature of grievance, agreed corrective actions and the date of the incident and final outcome. The number of grievances recorded and resolved and the outcomes will be displayed/disclosed in the PMU office, municipal office, and on the web, as well as reported in the safeguards monitoring reports submitted to ADB on a semi-annual basis.

62. **Periodic review and documentation of lessons learned.** The PMU safeguard officer will periodically review the functioning of the GRM in each town and record information on the effectiveness of the mechanism, especially on the project's ability to prevent and address grievances.

63. **Costs.** All costs involved in resolving the complaints (meetings, consultations, communication and reporting/information dissemination) will be borne by the concerned PIU at town-level; while costs related to escalated grievances will be met by the PMU. Any transportation costs incurred by affected persons or their representatives (e.g., CBOs, SEC representative/NGOs) to attend GRC meetings will be reimbursed by the concerned PIU. Cost estimates for grievance redress are included in resettlement cost estimates.

VI. POLICY AND LEGAL FRAMEWORK

64. The legal framework for the project is based on applicable legal and policy frameworks of the Government of Bangladesh and the ADB Safeguards Policy Statement 2009. The provisions of the Resettlement Framework and Small Ethnic Community Planning Framework will guide the entitlements for compensation and other assistance for different types of impacts applicable in this RSECP.

A. The Acquisition and Requisition of Immovable Property Act, 2017 (ARIPA)

65. For determination/ assessment of land price the existing Acquisition and Requisition of Immovable Property Act, 2017 spells out the following points: Matters to be considered in determining compensation:

- (i) in determining the amount of compensation to be awarded for any property to be acquired under this Part, the Deputy Commissioner shall take into consideration-
 - (a) the market value of the property at the date of publication of the notice under section 4;
 - (b) Provided that in determining such market value, the Deputy Commissioner shall take into account the average value, to be calculated in the prescribed manner, of the properties of similar description and with similar advantages in the vicinity during the twelve months preceding the date of publication of the notice under section 4;
 - (c) the damage that may be sustained by the person interested, by reason of the taking of any trees which may be on the property at the time of the making of the joint list;
 - (d) the damage that may be sustained by the person interested by reason of severing such property from his other property;
 - (e) the damage that may be sustained by the person interested by reason of the acquisition injuriously affecting his other properties, movable or immovable, in any other manner, or his earnings; and
 - (f) if in consequence of the acquisition of the property, the person interested is likely to be compelled to change his residence or place of business, the reasonable expenses, if any, incidental to such change.
- (ii) While the government is acquiring land, it shall provide the persons interested with compensation of 200 per centum of the market price as defined in sub-section 1(a): Provided that if the government acquires the land for any non-government person then the amount of compensation shall be 300 per centum.
- (iii) In cases of injuries made under sub-section 1(b), (c), (d) and (e), additional 100 per centum compensation shall be provided.
- (iv) Notwithstanding any compensation provided under this section, necessary steps may be taken to rehabilitate evicted persons due to acquisition in the prescribed form.

66. The first step in acquiring land is an application to the Ministry of Land through the concerned ministry requesting requisition and transfer of the land and property in question. A detailed statement specifying whether the land mentioned in the application is needed for public or private purpose, the area of the land, a sketch-map, purpose for which it could be used, etc. should be submitted as well. The Ministry of Land examines the application and sends it to the concerned Deputy Commissioner for necessary action. The Deputy Commissioner then authorizes the Additional Deputy Commissioner related to land (ADC Revenue) to prepare and execute a plan of action for requisition. The Deputy Commissioner in turn issues a public notice regarding the acquisition with a view to settling matters relating to payment of compensation to the owner or owners of the property or any other person or persons entitled to compensation, and any other related issues. When any property is required temporarily for a public purpose or in the public interest, the Deputy Commissioner may requisition it by an order in writing. In case of such a requisition of property, compensation shall be paid to the owner or owners of the property determined in accordance with legal provisions, and the decision taken by the government is

deemed to be final. Any person who contravenes or attempts to contravene an order, or who obstructs the enforcement of an order, is punishable with imprisonment for a term which may extend to three months, or with a fine which may extend to Taka three thousand, or with both.

B. Government of Bangladesh Policy for Small Ethnic Community

67. The Constitution of Bangladesh ensures affirmative action for small ethnic community peoples and prohibits discrimination inter alia on grounds of race, religion or place of birth, Article 23A of which provides, “the State shall take steps to protect and develop the unique local culture and tradition of the tribes, minor races, ethnic sects and communities”. It also spells out in Article 28 (4), “nothing in this Article shall prevent the State from making special provision in favor of women or children or for the advancement of any backward section of citizens”.

68. Many of the government laws that are related to the ownership of land and acquisition for the plain land are also applicable to SEC, ethnic minority (EM) and non-ethnic minority people. The laws include the (i) Code of Civil Procedure, 1908; (ii) the East Bengal State Acquisition and Tenancy Act, 1950; and (iii) ARIPA, 2017. However, these laws do not apply in Chittagong Hill Tracts (CHT), where a large proportion of indigenous people (IP) live. The CHT Regulation, 1900 is the single most important law for the CHT. The CHT Regulation, 1900 functions in the nature of a constitutional legal instrument and vets the application of other laws that apply to CHT, among others, by specifying the nature and extent of application of those laws. In addition to CHT Regulation, 1900 the other special laws that apply to the CHT include: (i) CHT Land Acquisition Regulation, 1958; (ii) Hill District Councils Acts, 1989; (iii) CHT Regional Council Act of 1998, (iv) CHT Land Disputes Resolution Commission Act of 2001 and (v) Chittagong Hill Tracts (Land Acquisition) (Amendment) Ordinance, 2018

C. ADB’s Safeguard Policy Statement (2009)

69. **Involuntary Resettlement Safeguard.** The objectives of ADB's Safeguard Policy Statement (SPS) 2009 with regard to involuntary resettlement are:(i) to avoid involuntary resettlement wherever possible; (ii) to minimize involuntary resettlement by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons in real terms relating to pre-project levels; and (iii) to improve the standards of living of the displaced poor and other vulnerable groups.

70. ADB's Safeguard Policy Statements covers physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas. It covers them whether such losses and involuntary restrictions are full or partial, permanent or temporary. Following are the basic policy principles of ADB’s SPS, 2009:

- (i) Identification of past, present, and future involuntary resettlement impacts and risks and determination of the scope of resettlement planning;
- (ii) Carry out meaningful consultations with affected persons, host communities, and concerned non-government organizations;
- (iii) Improvement or at least restoration of the livelihoods of all displaced persons;
- (iv) Ensure physically and economically displaced persons with needed assistance;
- (v) Improvement of the standards of living of the displaced poor and other vulnerable groups;

- (vi) Development of procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement;
- (vii) Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of nonland assets;
- (viii) Preparation of a resettlement plan elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule;
- (ix) Disclosure of resettlement plan, including documentation of the consultation process in a timely manner to affected persons and other stakeholders;
- (x) Execution of involuntary resettlement as part of a development project or program.
- (xi) Payment of compensation and provide other resettlement entitlements before physical or economic displacement; and
- (xii) Monitoring and assessment of resettlement outcomes, their impacts on the standards of living of displaced persons.

71. **Indigenous Peoples Safeguards.** The objective of the indigenous people's safeguards is to design and implement projects in a way that fosters full respect for indigenous people's identity, dignity, human rights, livelihood systems, and cultural uniqueness as defined by the indigenous people themselves so that they (i) receive culturally appropriate social and economic benefits; (ii) do not suffer adverse impacts as a result of projects; and (iii) can participate actively in projects that affect them. Provisions of the Constitution of India and several acts that ensure protection of scheduled tribes, as defined by the Constitution, the national and state policy framework for scheduled tribes, as discussed above, are aligned with the ADB's indigenous people's safeguards.

72. ADB SPS, 2009 uses the term Indigenous Peoples in a generic sense to refer to a distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees:

- (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- (ii) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- (iii) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and
- (iv) a distinct language, often different from the official language of the country or region.

73. In considering these characteristics, national legislation, customary law, and any international conventions to which the country is a party will be taken into account.

74. A group that has lost collective attachment to geographically distinct habitats or ancestral territories in the project area because of forced severance remains eligible for coverage under ADB SPS, 2009.

75. The following indigenous people safeguard policy principles are applied in ADB financed projects:

- (i) Screen early on to determine (i) whether indigenous people are present in, or have collective attachment to, the project area; and (ii) whether project impacts on indigenous people are likely;

- (ii) Undertake a culturally appropriate and gender-sensitive social impact assessment or use similar methods to assess potential project impacts, both positive and adverse, on indigenous people. Give full consideration to options the affected indigenous people prefer in relation to the provision of project benefits and the design of mitigation measures. Identify social and economic benefits for affected Indigenous People that are culturally appropriate and gender and inter-generationally inclusive and develop measures to avoid, minimize, and/or mitigate adverse impacts on indigenous people;
- (iii) Undertake meaningful consultations with affected indigenous people's communities and concerned indigenous people organizations to solicit their participation (i) in designing, implementing, and monitoring measures to avoid adverse impacts or, when avoidance is not possible, to minimize, mitigate, or compensate for such effects; and (ii) in tailoring project benefits for affected indigenous people communities in a culturally appropriate manner. To enhance indigenous people's active participation, projects affecting them will provide for culturally appropriate and gender inclusive capacity development. Establish a culturally appropriate and gender inclusive grievance mechanism to receive and facilitate resolution of the indigenous people's concerns;
- (iv) Ascertain the consent of affected Indigenous People communities to the following project activities: (i) commercial development of the cultural resources and knowledge of indigenous people; (ii) physical displacement from traditional or customary lands; and (iii) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, or spiritual uses that define the identity and community of indigenous people. For the purposes of policy application, the consent of affected indigenous people's communities refers to a collective expression by the affected indigenous people communities, through individuals and/or their recognized representatives, of broad community support for such project activities. Broad community support may exist even if some individuals or groups object to the project activities;
- (v) Avoid, to the maximum extent possible, any restricted access to and physical displacement from protected areas and natural resources. Where avoidance is not possible, ensure that the affected indigenous people communities participate in the design, implementation, and monitoring and evaluation of management arrangements for such areas and natural resources and that their benefits are equitably shared;
- (vi) Prepare an indigenous people plan (IPP) that is based on the social impact assessment with the assistance of qualified and experienced experts and that draw on indigenous knowledge and participation by the affected indigenous people communities. The IPP includes a framework for continued consultation with the affected indigenous people communities during project implementation; specifies measures to ensure that Indigenous People receive culturally appropriate benefits; identifies measures to avoid, minimize, mitigate, or compensate for any adverse project impacts; and includes culturally appropriate grievance procedures, monitoring and evaluation arrangements, and a budget and time-bound actions for implementing the planned measures;
- (vii) Disclose a draft IPP, including documentation of the consultation process and the results of the social impact assessment in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected indigenous people's communities and other stakeholders. The final IPP and its updates will also be disclosed to the affected indigenous people communities and other stakeholders;

- (viii) Prepare an action plan for legal recognition of customary rights to lands and territories or ancestral domains when the project involves (i) activities that are contingent on establishing legally recognized rights to lands and territories that indigenous people have traditionally owned or customarily used or occupied, or (ii) involuntary acquisition of such lands; and
- (ix) Monitor implementation of the IPP using qualified and experienced experts; adopt a participatory monitoring approach, wherever possible; and assess whether the IPP's objective and desired outcome have been achieved, considering the baseline conditions and the results of IPP monitoring. Disclose monitoring reports.
- (x) Provisions of the Constitution of India and several acts that ensure protection of scheduled tribes, as defined by the Constitution, the national and state policy framework for scheduled tribes, as discussed above, are aligned with the ADB's indigenous people's safeguards.

D. Comparison Between ARIPA, 2017 and ADB SPS, 2009 (safeguards requirement 2)

76. Difference between the national land acquisition act and principles laid down in ADB SPS, 2009 is compared in the Table 13 below and the measures to bridge the gaps are discussed.

Table 13: Comparison between Government of Bangladesh Laws and ADB Safeguard Policies on Land Acquisition and Resettlement

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
1	Involuntary resettlement should be avoided wherever possible.	The Act has no direct statement that involuntary Resettlement should be avoided. The Section-4 of the act mentions: 4. Publication of preliminary notice of acquisition of immovable property:(1) Whenever it appears to the Deputy Commissioner that any property in any locality is needed or is likely to be needed for any public purpose or in the public interest, he shall cause a notice to be published at convenient places on or near the property in the prescribed form and manner stating that the property is proposed to be acquired.	The Executing Agency will follow ADB's SPS to avoid involuntary resettlement where feasible, if involuntary resettlement impacts cannot be avoided mitigation measures will be taken as per policy
2	Regarding the compensation issue, ADB safeguards policy 2009 spells out the following points: The borrower/client will provide adequate and appropriate replacement land and structures or cash compensation at full replacement cost for lost land and structures, adequate compensation for partially Damaged structures, and relocation assistance, if applicable, to those persons (i) with formal legal rights to land lost in its entirety or in part; and (ii) persons who lost the land they occupy in its entirety or in part who have no formal legal rights to such land, but who have claims to such lands that are recognized or recognizable under national laws.	Payment of compensation at "market value" for the properties acquired for development projects. Land Acquisition Acts does not clearly mention regarding the 'full replacement cost'. The Section-9 of the ARIPA, 2017 point outs the following: Matters to be considered in determining compensation: (1) In determining the amount of compensation to be awarded for any property to be acquired under this Part, the Deputy Commissioner shall take into consideration- (a) the market value of the property at the date of publication of the notice under section 4: Provided that in determining such market value, the Deputy Commissioner shall take into account the average value, to be calculated in the prescribed manner, of the properties of similar description and with similar advantages in the vicinity during the twelve months preceding the date of publication of the notice under section 4. (b) the damage that may be sustained by the person interested, by reason of the taking of any standing crops or trees which may be on the property at the time of the making of the joint list; (c) the damage that may be sustained by the person interested by reason of severing such property from his other property; (d) the damage that may be sustained by the person interested by reason of the acquisition injuriously affecting his other properties, movable or immovable, in any other manner, or his earnings; and (e) if in	The Executing Agency will ensure the full replacement cost dealing with ADB safeguards policy, and will address the gaps between the government and ADB policy. The project proponent will ensure payment of compensation and other resettlement entitlements prior to physical or economic displacement.

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
		<p>consequence of the acquisition of the property, the person interested is likely to be compelled to change his residence or place of business, the reasonable expenses, if any, incidental to such change. (2) While the government is acquiring land, it shall provide the persons interested with compensation of 200 per centum of the market price as defined in sub- section 1(a): Provided that if the government acquires the land for any non-government person, then the amount of compensation shall be 300 per centum. (3) In cases of injuries made under sub-section 1(b), (c), (d) and (e), additional 100 per centum compensation shall be provided. (4) Notwithstanding any compensation provided under this section, necessary steps may be taken to rehabilitate evicted persons due to acquisition in the prescribed form.</p>	
3	<p>For those persons who lost the land they occupy in its entirety or in part who have neither formal legal rights nor recognized or recognizable claims to such land, prior to their relocation is given only if they occupied the land or structures in the project area prior to the cut-off-date for eligibility for resettlement assistance.</p>	<p>ARIPA 2017, Section 9 subsection (b) mentions the damage that may be sustained by the person interested, by reason of the taking of any standing crops or trees which may be on the property at the time of the making of the joint list.</p>	<p>The Executing Agency will ensure payment of compensation for the lost assets and crops and trees to both title holders and non-title holders for their lost assets.</p>
4	<p>As per ADB safeguards policy, displaced persons in a project area could be of three types: (i) persons with formal legal rights to land lost in its entirety or in part; (ii) persons who lost the land they occupy in its entirety or in part who have no formal legal rights to such land, but who have claims to such lands that are recognized or recognizable under national laws; and (iii) persons who lost the land they occupy in its entirety or in part who have neither formal legal rights nor recognized or recognizable claims to such land. The involuntary resettlement requirements apply to all three types of displaced persons.</p>	<p>ARIPA, 2017 of the GOB does not allow to be compensated to the persons who do not have legal title of the lands/ assets to be acquired. It recognizes only the entitlements of the legal titleholders who are capable of establishing their ownership rights. The only exception is for sharecroppers who have cultivated standing crops under a legally constituted written agreement; they are entitled to a part of the compensation money as provided for in the written agreement.</p> <p>Section 12 for ARIPA 2017. Payment of compensation to bargadar. (sharecropper) Notwithstanding anything contained in this Act, when the property acquired under this Part contains standing crops cultivated by <i>bargadar</i>, such portion of the compensation as may be determined by the Deputy Commissioner for the crops shall be paid to the <i>bargadar</i>. 23. Payment of compensation: (1) On section 22, the Deputy</p>	<p>Non-titleholders are considered eligible to receive compensation as per ADB safeguards policy. The project will recognize both titleholder and non-titleholder affected persons and compensate them for the inconvenience as per the entitlement matrix.</p>

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
		Commissioner's the compensation awarded by him to the thereto according to the award and shall prevented by any of the contingencies (2).	
5	Preference will be given to land-based resettlement strategies for displaced persons whose livelihoods are land-based.	ARIPA 2017 indicate cash compensation for properties to be acquired.	The Project may consider land for land for vulnerable affected persons on case-to-case basis.
6	The rate of compensation acquired housing, land and to assets will be calculated at replacement costs. The calculation of full replacement cost will be based on following elements: (I) fair market value; (ii) transaction costs; (iii) interest accrued, (iv) transition and restoration costs; and (v) other applicable payments, if any.	Section-9 of the ARIPA, 2017. Matters to be considered in determining compensation: (1) In determining the amount of compensation to be awarded for any property to be acquired under this Part, the Deputy Commissioner shall take into consideration- (a) the market value of the property at the date of publication of the notice under section 4: Provided that in determining such market value, the Deputy Commissioner shall take into account the average value, to be calculated in the prescribed manner, of the properties of similar description and with similar advantages in the vicinity during the twelve months preceding the date of publication of the notice under section 4;	The GOB Act is consistent with ADB safeguards policy at large, in case of considering market price/value, however, it is not consistent with the 'Replacement Cost' which needs to be addressed by the Executive Agency in the resettlement plan.
7.	Establishment of Grievance Redress Mechanism/ Committee for resolving the Grievances of the affected persons	Land Acquisition Laws does not have any provision of forming GRM/GRC. The affected persons may appeal in dealing with the following section of the land acquisition acts: Objections against acquisition: (1) Any person concerned may file an objection against the acquisition proceeding to the Deputy Commissioner within 15 working days. (2) The Deputy Commissioner shall, speedily hear the objection filed under sub-section 1 in the presence of the appellant or an agent, after hearing all such objections and after making such further inquiry, if any, as he thinks necessary, prepare a report within thirty working days, and in case of a nationally important project within 15 working days, following the expiry of the period specified under sub- section (1) containing his opinion on the objections.	As per ADB Safeguards Policy 2009, GRM/ GRC will be established to redress the grievances of the project affected persons and appraise them on the same.

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
8.	<p>Meaningful consultations with affected persons, host communities, and concerned nongovernment organizations, and establish a grievance redress mechanism that would receive and facilitate resolution of the concerns of the affected persons.</p>	<p>No provisions for stakeholder consultations or to establish a grievance redress mechanism. Affected persons may raise objections to land acquisition only after section 5 Notice is issued, while disputes over land acquisition have to be settled through an arbitrator or the courts of law. The Section-4 spells out: Section 4. Publication of preliminary notice of acquisition of immovable property:(1) Whenever it appears to the Deputy Commissioner that any property in any locality is needed or is likely to be needed for any public purpose or in the public interest, he shall cause a notice to be published at convenient places on or near the property in the prescribed form and manner stating that the property is proposed to be acquired. (2) In case of acquisition of immovable property for any.</p>	<p>Stakeholder consultations and disclosure meetings with the project affected persons are required before starting the acquisition process by the Government. Any grievances will have to be addressed as per established/ agreed GRC of the project. Meaningful consultations must be carried out by the Project with affected persons and community and other stakeholders, throughout the life cycle of the Project.</p>
9.	<p>ADB's Public Communications Policy, requires that relevant information on social and environmental safeguard issues is made available in a timely manner, in an accessible place, and in a form and language(s) understandable to affected people and to other stakeholders, including the general public, so they can provide meaningful inputs into project design and implementation.</p>	<p>Under ARIPA 2017, Section 4, the Deputy Commissioner, whenever it appears to him that any property in any locality is needed or is likely to be needed for any public purpose or in public interest, will cause a notice, to be published at convenient places on or near the property in the prescribed form and manner stating that the property is proposed to be acquired. There is no other disclosure requirement under the Act.</p>	<p>The project proponent will ensure disclosure of draft and final resettlement plan, including documentation of the consultation process in a timely manner. It will also disclose project information leaflet, entitlement matrix, the grievance redress mechanism and semi-annual social safeguard monitoring reports (SSMRs) with the affected persons and other stakeholders. The draft and final resettlement plans and the SSMRs will be disclosed on the website of the CTCRSP project and ADB.</p>

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
10	Need to conduct census for the Displace Persons (DPs) for resettlement plan preparation.	<p>ARIPA 2017 does not have any provision for conducting census/ socio-economic survey for those who will be displaced due to land acquisition.</p> <p>The laws spell out: Section 40. Power to enter and inspect: (1) With a view to acquiring or requisitioning any property or determining the compensation payable in respect thereof or securing compliance with an order made under this Act, the Deputy Commissioner or any officer, generally or specially authorized by the Deputy Commissioner in this behalf, and any of the assistants and workmen may- (a) enter upon and survey and take levels of any property; (b) inspect any property or anything therein; (c) measure and set out the boundaries and prepare a plan of any property and the intended line of the work, if any, proposed to be made thereon; (d) mark such levels, boundaries and line by placing marks and cutting trenches, and, where otherwise the survey cannot be completed and the levels taken and the boundaries and line marked, cut down and clear away any part of any standing crop, tree or jungle: Section 41. Power to obtain information: With a view to acquiring or requisitioning any property or determining the compensation payable in respect thereof, the Deputy Commissioner may, by order in writing, require any person to furnish to such officer or authority, as may be specified in the order, such information in his possession as may be specified relating to any property which is acquired or requisitioned, or intended to be acquired or requisitioned, under this Act.</p>	As per ADB safeguards policy census survey for the affected households for the assessment of the affected properties required, and the findings will be incorporated in the resettlement plan.
11	A comprehensive income and livelihood rehabilitation program, supported by an adequate budget, is in place to help displaced persons improve, or at least restore, their incomes and livelihoods	Government laws does not have any provision for providing livelihoods support for those who will be displaced due to land acquisition.	Livelihood restoration/ support program and budget will be included in the Resettlement Plan document.

ADB = Asian Development Bank, ARIPA = Acquisition and Requisition of Immovable Property Act, 2017, IOL = inventory of losses, SPS = Safeguard Policy Statement.

E. Comparison Between Government of Bangladesh Policy on Small Ethnic Communities and ADB SPS, 2009 (safeguards requirement 3)

77. **Government of Bangladesh Policy.** The Constitution of Bangladesh ensures affirmative action for small ethnic community peoples and prohibits discrimination inter alia on grounds of race, religion or place of birth, Article 23A of which provides, "the State shall take steps to protect and develop the unique local culture and tradition of the tribes, minor races, ethnic sects and communities". It also spells out in Article 28 (4), "nothing in this Article shall prevent the State from making special provision in favor of women or children or for the advancement of any backward section of citizens".

78. Many of the government laws that are related to the ownership of land and acquisition for the plain land are also applicable to SEC, ethnic minority (EM) and non-ethnic minority people. The laws include the (i) Code of Civil Procedure, 1908; (ii) the East Bengal State Acquisition and Tenancy Act, 1950; and (iii) ARIPA, 2017. According to the Gazette of Bangladesh Cultural Ministry, dated March 23, 2019, 50 types of small ethnic communities live in Bangladesh.

79. **ADB SPS on indigenous peoples safeguards.** Over more than a decade, ADB (as well as other development partners) has developed rigorous procedures to assess the likely impact of its projects or programs on indigenous peoples, and then to incorporate appropriate measures through indigenous peoples' plans (IPPs). These are articulated in the 2009 Safeguards Policy Statement (particularly Safeguards Requirement 3 on indigenous peoples).

80. ADB SPS provides details of the process to be followed for the assessment and mitigation of indigenous peoples impacts, while Government of Bangladesh defines who such peoples are, and the specific terminology to be used for such community groups in Bangladesh. The broad outlines of ADB's operational procedures are provided below, with a particular focus on the safeguards for indigenous peoples. It may be mentioned that there are no such procedures or requirements of Government of Bangladesh, for projects/subprojects involving impacts to SEC.

81. As per ADB policy, at the project identification stage, project screening and categorization are undertaken to determine the significance of potential impacts or risks that the project might present with respect to indigenous peoples, to identify the level of assessment and institutional resources required to address safeguard issues, and to determine the information disclosure and consultation requirements. The project team uses screening checklists to this effect. A proposed project is then assigned to different categories, depending on the significance of the potential impacts on indigenous peoples. It is classified as Category A, if the impacts are likely to be significant: an Indigenous Peoples Plan (IPP), including assessment of social impacts, is required. It is Category B, if considered likely to have limited impacts on indigenous peoples, and an IPP is also required. A proposed project is Category C if not expected to have impacts on indigenous peoples, and no further action is required. An initial poverty and social analysis is prepared for every project as early as possible in the project cycle.

82. The SPS articulates the role and responsibilities of the ADB on the one hand, and borrowers or clients on the other. The implementation of the provisions of the safeguard policies is the responsibility of the latter. They are required to undertake social and environmental assessments, to carry out consultations with the affected people and communities, prepare and implement safeguard plans (including the IPPs), and prepare and submit monitoring reports. ADB's role is to explain policy requirements to borrowers and clients, help them meet these requirements during project processing and implementation through capacity-building programmes, ensure due diligence and review, and provide monitoring and supervision.

83. ADB SPS outlines the main points of social impact assessment that should be covered by an IPP. It should, in summary: review the legal and institutional framework applicable to indigenous peoples in the project context; provide baseline information on the demographic, social, cultural and political characteristics of the affected indigenous peoples communities; identify key project stakeholders, and elaborate a culturally appropriate and gender-sensitive process for meaningful consultation, at each stage of preparation and implementation; assess the potential adverse and positive effects of the project; assess the perceptions of affected indigenous peoples about the project and its impact; and recommend measures to avoid adverse effects (or at least minimize, mitigate and compensate for such effects), and ensure that indigenous peoples receive culturally appropriate benefits under the project.

84. ADB has special procedures for financing modalities such as sector lending. For any sector investment project that classified as A or B for indigenous peoples, the project team works with the borrower/client to prepare an “Indigenous Peoples Planning Framework” (IPPF). This will guide the selection, screening and categorization of any subprojects; social and environmental assessment; and the preparation and implementation of the safeguard plans of subprojects. Among other things, the IPPF should assess the adequacy of the borrower/client’s capacity to implement national laws and ADB requirements; specify implementation procedures, including the budget, institutional arrangements, and capacity development requirements; specify monitoring and reporting requirements; and describe the responsibilities of the borrower/clients in relation to the preparation, implementation and progress review of safeguard documents of subprojects.

85. As mentioned above, there is a difference in the terminology and processes used by ADB and Government of Bangladesh. In the context of CTCRSP, the Government of Bangladesh’s official term “small ethnic community/communities” is adopted, while referring to small ethnic/indigenous peoples groups. The above processes recommended under ADB SPS are contextualized for CTCRSP and a Small Ethnic Communities Planning Framework is prepared in lieu of an IPPF, to guide project preparation involving SEC impacts if any, after loan approval. Likewise, for subprojects involving impacts to SEC, standalone small ethnic communities plan (SECP) or combined resettlement and small ethnic communities plans (RSECP) and/or due diligence reports including specific action plans for inclusion of the SEC in project benefits and maximization of such benefits to the SEC, are proposed under CTCRSP, to ensure that process gaps are bridged, while the government’s recommended terminology is followed.

86. Difference between the national policies on Small Ethnic Community and ADB SPS, 2009 safeguard requirements for indigenous people is compared in the Table 14 below and the measures to bridge the gaps are discussed.

Table 14: Gap Analysis on National Policies (Government of Bangladesh) for Small Ethnic Communities and ADB SPS 2009

ADB Indigenous Peoples Policy Principles	Government of Bangladesh (GOB) Policies	Gap Analysis and Measures to Bridge the Gaps
Policy Principle 1: Screen early on to determine (i) whether Indigenous Peoples are present in, or have collective attachment to, the project	Constitution of Bangladesh ensures affirmative action for small ethnic community peoples and prohibits discrimination inter alia on grounds of race, religion or place of	The Constitution of Bangladesh does not specify on early screening of projects for indigenous people,

ADB Indigenous Peoples Policy Principles	Government of Bangladesh (GOB) Policies	Gap Analysis and Measures to Bridge the Gaps
area; and (ii) whether project impacts on Indigenous Peoples are likely.	birth, Article 23A of which provides, "the State shall take steps to protect and develop the unique local culture and tradition of the tribes, minor races, ethnic sects and communities".	<p>termed as 'small ethnic community' (SECs) by the Constitution.</p> <p>The Project shall screen the subprojects early to determine the presence of SECs.</p>
<p>Policy Principle 2: Undertake a culturally appropriate and gender-sensitive social impact assessment or use similar methods to assess potential project impacts, both positive and adverse, on Indigenous Peoples. Give full consideration to options the affected Indigenous Peoples prefer in relation to the provision of project benefits and the design of mitigation measures. Identify social and economic benefits for affected Indigenous Peoples that are culturally appropriate and gender and intergenerationally inclusive and develop measures to avoid, minimize, and/or mitigate adverse impacts on Indigenous Peoples.</p>	<p>Article 28 (4) of the Constitution of Bangladesh mentions, "nothing in this Article shall prevent the State from making special provision in favor of women or children or for the advancement of any backward section of citizens"</p> <p>Bangladesh Environment Conservation Act (BECA), 1995, mandates obtaining environmental clearance from the Director General, Department of Environment for which detailed rules on, inter alia, Environmental Impact Assessment (EIA) is specified in the Environment Conservation Rule, 1997. The EIA requires to carry out baseline data generation and impact assessment including the social receptors; this helps in generating socio-economic profile of the area and it assists the project developers in identifying priority areas for their socioeconomic development programmes.</p>	<p>Although the Constitution of Bangladesh mentions about making special provisions for women, children and any backward section of citizens, it or any Act, under GOB does not speak about conducting social impact assessment.</p> <p>Partial equivalence is noted in conducting social impact assessment, which is included in the EIA and mitigation plans prepared accordingly.</p> <p>The project will conduct social impact assessment in a culturally appropriate and gender-sensitive manner. The SIA will capture both positive and adverse impacts due to the project on SECs and will include measures to avoid, minimize and/or mitigate any adverse impacts to SECs.</p>
<p>Policy Principle 3: Undertake meaningful consultations with affected Indigenous Peoples communities and concerned Indigenous Peoples organizations to solicit their participation (i) in designing, implementing, and monitoring measures to avoid adverse impacts or, when avoidance is not possible, to minimize, mitigate,</p>	<p>Acquisition and Requisition of Immovable Property Act 2017 states that affected persons may raise objections to land acquisition only after section 5 Notice is issued, while disputes over land acquisition have to be settled through an arbitrator or the courts of law.</p>	<p>No provisions for consultations with SECs or to establish a grievance redress mechanism to facilitate resolution of grievances received from SEC. There is no specific mention of SECs in ARIPA 2017.</p>

ADB Indigenous Peoples Policy Principles	Government of Bangladesh (GOB) Policies	Gap Analysis and Measures to Bridge the Gaps
<p>or compensate for such effects; and (ii) in tailoring project benefits for affected Indigenous Peoples communities in a culturally appropriate manner. To enhance Indigenous Peoples' active participation, projects affecting them will provide for culturally appropriate and gender inclusive capacity development. Establish a culturally appropriate and gender inclusive grievance mechanism to receive and facilitate resolution of the Indigenous Peoples' concerns.</p>		<p>The project will undertake meaningful consultation with the small ethnic community people, in a culturally appropriate manner at a location suitable for the SEC community to attend the meetings. The meetings will be conducted in a language understandable to the SEC community. The grievance redress committee at the PMU level (3rd level grievance) will have a representative from small ethnic community.</p>
<p>Policy Principle 4: Ascertain the consent of affected Indigenous Peoples communities to the following project activities: (i) commercial development of the cultural resources and knowledge of Indigenous Peoples; (ii) physical displacement from traditional or customary lands; and (iii) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, or spiritual uses that define the identity and community of Indigenous Peoples. For the purposes of policy application, the consent of affected Indigenous Peoples communities refers to a collective expression by the affected Indigenous Peoples communities, through individuals and/or their recognized representatives, of broad community support for such project activities. Broad community support may exist even if some individuals or groups object to the project activities.</p>	<p>Many of the government laws that are related to the ownership of land and acquisition for the plain land are also applicable to SEC, ethnic minority (EM) and non-ethnic minority people; these include the (i) Code of Civil Procedure, 1908; (ii) the East Bengal State Acquisition and Tenancy Act, 1950; and (iii) ARIPA, 2017. These laws do not apply in Chittagong Hill Tracts (CHT), where a large proportion of indigenous people (IP) live. The CHT Regulation, 1900 is the single most important law. CHT Regulation, 1900 the other special laws that apply to the CHT include: (i) CHT Land Acquisition Regulation, 1958; (ii) Hill District Councils Acts, 1989; (iii) CHT Regional Council Act of 1998, (iv) CHT Land Disputes Resolution Commission Act of 2001 and (v) Chittagong Hill Tracts (Land Acquisition) (Amendment) Ordinance, 2018. SEC customary use of land in the CHT is not recognized by the government and is considered as unclassified forest, village common</p>	<p>There is no provision to take consent of affected SECs or broad community support for any project activities under the law. Clearance for a project is given by Department of Environment based on environment and social impact assessment.</p> <p>For subprojects that involve commercial development of cultural resources and knowledge of SEC/IPs, or physical displacement from traditional or customary lands, or commercial development of natural resources within customary lands, the project will seek broad community support of SEC communities and will be appropriately documented.</p>

ADB Indigenous Peoples Policy Principles	Government of Bangladesh (GOB) Policies	Gap Analysis and Measures to Bridge the Gaps
<p>Policy Principle 5: Avoid, to the maximum extent possible, any restricted access to and physical displacement from protected areas and natural resources. Where avoidance is not possible, ensure that the affected Indigenous Peoples communities participate in the design, implementation, and monitoring and evaluation of management arrangements for such areas and natural resources and that their benefits are equitably shared.</p>	<p>forest, and government (<i>khas</i>) lands, although different groups of SEC of the CHT have been using such lands from immemorial times as common land or ancestry land of common use.</p>	<p>Restricted access and physical displacement from customary land and natural resources will be avoided to the maximum extent possible. Where unavoidable, affected SECs/ communities will actively participate in the design, implementation and monitoring and evaluation of management arrangements. Benefits from the subproject will be equitably shared.</p>
<p>Policy Principle 6: Prepare an Indigenous Peoples plan (IPP) that is based on the social impact assessment with the assistance of qualified and experienced experts and that draw on indigenous knowledge and participation by the affected Indigenous Peoples communities. The IPP includes a framework for continued consultation with the affected Indigenous Peoples communities during project implementation; specifies measures to ensure that Indigenous Peoples receive culturally appropriate benefits; identifies measures to avoid, minimize, mitigate, or compensate for any adverse project impacts; and includes culturally appropriate grievance procedures, monitoring and evaluation arrangements, and a budget and time-bound actions for implementing the planned measures.</p>	<p>-</p>	<p>Provision for preparation of IPP is not specified under the law. The project authority will prepare Small Ethnic Community Plan (SECP) or Resettlement and Small Ethnic Community Plan (RSECP) for subprojects where indigenous peoples' safeguards are triggered based on the guidelines outlined in the Small Ethnic Community Planning Framework (SECPF).</p>
<p>Policy Principle 7: Disclose a draft IPP, including documentation of the consultation process and the results of the social impact assessment in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected Indigenous Peoples communities and other stakeholders. The final IPP and its updates will also be disclosed to</p>	<p>Under ARIPA 2017, Section 4, the Deputy Commissioner, whenever it appears to him that any property in any locality is needed or is likely to be needed for any public purpose or in public interest, will cause a notice, to be published at convenient places on or near the property in the prescribed form and manner stating that the property is proposed to be acquired.</p>	<p>There is no provision for preparation or disclosure of IPP under the law.</p> <p>Both draft and final SECP/RSECPs will be disclosed in the communities and on the Project and ADB websites.</p>

ADB Indigenous Peoples Policy Principles	Government of Bangladesh (GOB) Policies	Gap Analysis and Measures to Bridge the Gaps
the affected Indigenous Peoples communities and other stakeholders.		
<p>Policy Principle 8: Prepare an action plan for legal recognition of customary rights to lands and territories or ancestral domains when the project involves (i) activities that are contingent on establishing legally recognized rights to lands and territories that Indigenous Peoples have traditionally owned or customarily used or occupied, or (ii) involuntary acquisition of such lands.</p>		<p>Although SEC are recognized, there is no mention of ancestral domains or customary lands or territories of SECs in the national laws.</p> <p>SEC customary use of land in the CHT is not recognized by the government and is considered as unclassified forest, village common forest, and government (<i>khas</i>) lands, although different groups of SEC of the CHT have been using such lands from immemorial times as common land or ancestry land of common use.</p> <p>A SEC Specific Action Plan will be prepared for legal recognition of customary rights to lands and territories or ancestral domains when the project involves (i) activities that are contingent on establishing legally recognized rights to lands and territories that Indigenous Peoples/SECs have traditionally owned or customarily used or occupied; or (ii) involuntary acquisition of such lands is involved.</p>
<p>Policy Principle 9: Monitor implementation of the IPP using qualified and experienced experts; adopt a participatory monitoring approach, wherever possible; and assess whether the IPP's objective</p>	-	<p>There is no such provision for monitoring under the law, as there is no requirement for SEC preparation and implementation.</p>

ADB Indigenous Peoples Policy Principles	Government of Bangladesh (GOB) Policies	Gap Analysis and Measures to Bridge the Gaps
and desired outcome have been achieved, taking into account the baseline conditions and the results of IPP monitoring. Disclose monitoring reports.		Implementation of SECPs/RSECPs will be covered by regular internal monitoring activities, as described further in 'Program for Monitoring and Evaluation' Chapter in SECPF. Monitoring indicators will be included in semi-annual social monitoring reports, which will be disclosed.

87. The Government of Bangladesh policies and legal instruments are supplemented by ADB SPS, 2009 for the implementation of CTCRSP. ADB SPS, 2009 ensures equality of opportunity to be derived from project interventions for SEC. ADB SPS, 2009 emphasizes that development interventions will be planned in a manner consistent with the needs and aspirations of affected indigenous peoples, and compatible in substance and structure with affected SEC's culture and social and economic institutions.

88. This SECPF will provide guidelines to mitigate the adverse impact, if any, through the preparation of a small ethnic communities' plan (SECP) or a resettlement and small ethnic community plan (RSECP). The need for an SECP or a RSECP will depend on the nature and scale of the project impacts and sensitivity of SEC issues. Based on the initial poverty and social assessment prepared in every project, a requirement for preparing an SECP/RSECP will be identified. An SECP would be required if the impact is "significant," which means (i) adverse impacts on customary rights of use and access to land and natural resources; (ii) negative effects on the socioeconomic and cultural integrity; (iii) effects on health, education, livelihood, access to project benefits, and social security status; and (iv) other impacts that may alter or undermine indigenous knowledge and customary institutions. In case of limited impacts on indigenous people due to land acquisition and/or limited involuntary resettlement, these impacts will be addressed by specific action planned for mitigation and included within the resettlement plan. These specific action plans will be incorporated into the resettlement plan to safeguard their interest as small ethnic communities. The decision of preparing a specific action plan for the small ethnic communities or a small ethnic community plan will thus depend on the significance and severity of impacts identified through the screening process. An SEC impact checklist to be used in the SEC screening exercise during project preparation is provided in the RSECF.

F. Policy Principles for the Project CTCRSP

89. The project will recognize three types of physically displaced persons like (i) persons with formal legal rights to land lost in its entirety or in part; (ii) persons who lost the land they occupy in its entirety or in part who have no formal legal rights to such land, but who have claims to such lands that are recognized or recognizable under national laws; and (iii) persons who lost the land they occupy in its entirety or in part who have neither formal legal rights nor recognized or recognizable claims to such land. The involuntary resettlement requirements apply to all 3 types

of physically displaced persons. It also applies to all types of economically displaced persons – those facing permanent income loss as well as those facing temporary income loss.

90. For any ADB financed projects requiring involuntary resettlement, resettlement planning is an integral part of project design, to be dealt with from the earliest stages of the project cycle, taking into account the following basic principles:

- (i) Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of displaced persons, including a gender analysis, specifically related to resettlement impacts and risks.
- (ii) Carry out meaningful consultations with affected persons, host communities, concerned nongovernment organizations and other relevant stakeholders. Inform all displaced and affected persons of their entitlements and resettlement options. Ensure their participation in planning, implementation, and monitoring and evaluation of resettlement programs. Pay particular attention to the needs of vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and Indigenous Peoples, and those without legal title to land, and ensure their participation in consultations. Establish a grievance redress mechanism to receive and facilitate resolution of the affected persons' concerns. Support the social and cultural institutions of displaced persons and their host population.
- (iii) Improve, or at least restore, the livelihoods of all displaced persons through (i) land-based resettlement strategies when affected livelihoods are land based where possible or cash compensation at replacement value for land, (ii) prompt replacement of assets with access to assets of equal or higher value, (iii) prompt compensation at full replacement cost for assets that cannot be restored, and (iv) additional revenues and services through benefit sharing schemes where possible.
- (iv) Provide physically and economically displaced persons with needed assistance, including the following: (i) if there is relocation, secured tenure to relocation land, better housing at resettlement sites with comparable access to employment and production opportunities, integration of resettled persons economically and socially into their host communities, and extension of project benefits to host communities; (ii) transitional support and development assistance, such as land development, credit facilities, training, or employment opportunities; and (iii) civic infrastructure and community services, as required.
- (v) Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards.
- (vi) Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who enter into negotiated settlements will maintain the same or better income and livelihood status.
- (vii) Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets.
- (viii) Prepare a resettlement plan for all packages with resettlement impacts elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule.
- (ix) Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner, before project appraisal, in an accessible place and a

form and language(s) understandable to affected persons and other stakeholders. Disclose the final resettlement plan and its updates to affected persons and other stakeholders.

- (x) Conceive and execute involuntary resettlement as part of a development project or program. Include the full costs of resettlement in the presentation of project's costs and benefits. For a project with significant involuntary resettlement impacts, consider implementing the involuntary resettlement component of the project as a stand-alone operation.
- (xi) Pay compensation and provide other resettlement entitlements before physical or economic displacement. Implement the resettlement plan under close supervision throughout project implementation.
- (xii) Monitor and assess resettlement outcomes, their impacts on the standards of living of displaced persons, and whether the objectives of the resettlement plan have been achieved by taking into account the baseline conditions and the results of resettlement monitoring. Disclose monitoring reports.

VII. ENTITLEMENTS, ASSISTANCES AND BENEFITS

91. The project entitlement policy addresses potential direct and indirect impacts of project construction and operation on displaced persons, households and communities due to involuntary acquisition, including those that will be acquired through ARIPA 2017. The most direct and immediate impacts are those associated with project construction, mainly temporary income loss and loss of trees. Mitigation is provided through compensation and assistance to project-displaced persons on the basis of this policy framework adopted by the project. The policy provides mitigation for:

- (i) Temporary loss of livelihood or income opportunities;
- (ii) Loss of trees;
- (iii) Temporary impacts or access disruptions due to project construction work.

92. Compensation eligibility is limited by cut-off-date; the start date of DMS and census survey is cut-off-date for non-titleholders and date of publication of the notice by the Deputy Commissioner under Section 4 of ARIPA, 2017 for land acquisition is considered the cut-off-date for titleholders. The project entitlement matrix (Table 15) identifies and lists various types of losses.

93. Damages/unanticipated losses caused during construction, if any will be eligible for compensation. Such issues will be identified and closely monitored by the safeguard monitoring unit of the PMU and PIUs. Compensation for unanticipated temporary impacts and damage during construction will be borne by the contractor. Unanticipated losses, if any, will be mitigated/compensated as per the entitlement matrix of this resettlement framework. Loss of drinking water, sanitation and/or any other facility due to damage of existing infrastructure during construction will be mitigated through provision of alternate facilities (e.g., alternate means of water supply).

94. The entitlement matrix provides guidance for compensation, resettlement, and rehabilitation assistance. The entitlement matrix lists various types of losses, defines eligibility criteria and entitlements and provides basic parameters for preparation of compensation and resettlement benefits. The entitlement matrix is prepared in accordance with GOB and ADB SPS, 2009, presented in Table 15.

Table 15: Entitlement Matrix

Sl. No.	Type of Loss	Application	Entitled Person/No. of Affected Persons	Compensation Entitlements ¹⁶	Remarks
A. Loss of Income					
A.1	Loss of Income	Temporary business losses along the ROW/ proposed land for the subprojects	Traders, shop owners and their employees (for both titleholders and non-titleholders) Two roadside business shops	(i) 30 days' advance notice regarding construction activities, including duration and type of disruption; (ii) Cash compensation equivalent to net income from the affected business for the period of disruption on producing relevant income or income tax return documents; in absence of proper income documents, the income will be calculated by the Joint Verification Committee. (iii) The employees will receive compensation equivalent to their net income or minimum wage rate (whichever is higher) for the duration of disruption based on the payment/salary/wage receipts. If income documents are not available then the person will receive compensation calculated as per the minimum wage rate. ¹⁷ (iv) Shifting allowance based on actual cost of moving calculated at BDT 15,000.00 will be paid to the affected road-shop owners (if they are required to shift out of the place) temporarily to an alternate location; the shifting cost will include dismantling, reconstruction, loading, unloading and any other related cost; (v) For construction activities involving disruption for a period of more than a month, provision of alternative sites for road-side shops for continued economic activities shall be provided. If not possible, allowance based on the net income of the affected business or minimum	<ul style="list-style-type: none"> Determination of income loss during detail census and socio-economic survey conducted and part of final resettlement plan preparation. PIU will do the Identification of alternative temporary sites to support the road-side shops to continue economic activity. Contractor's actions to ensure there is no income/access loss consistent with the initial environmental examination. This includes: leaving spaces for access between mounds of soil, providing walkways and metal sheets to maintain access across trenches for people and vehicles where required, increased workforces to finish work in areas with impacts on access, timing of works to reduce disruption during business hours, phased construction schedule and

¹⁶ All cash compensations other than statutory compensations in this entitlement matrix will be adjusted for inflation until the year of compensation payment.

¹⁷ Bangladesh government does not have any directive on minimum wage rate except for readymade garments employees. Minimum wage rate for them is BDT 8100 per month as updated in December 2020. This Resettlement Framework considers the minimum daily wage rate for the affected employees at current market rate for wage labour, BDT 400.

Sl. No.	Type of Loss	Application	Entitled Person/No. of Affected Persons	Compensation Entitlements ¹⁶	Remarks
				wage rate for the affected households up to 3 months or the actual period of disruption whichever is more. (vi) Additional compensation for vulnerable affected persons as specified in row c.1.	working one segment at a time and one side of the road
B. Loss of Trees and Crops					
B.2	Loss of timber and fruit bearing trees	Trees on affected land parcel	Legal titleholder/ tenant/ leaseholder/ sharecropper/ non-titled affected person Four households	(i) 60 days advance notice to harvest existing fruits; (ii) For landowners: Cash compensation under Law (CCL) as per ARIPA, 2017, or, cost of trees based on annual net product value multiplied by number of productive years remaining, whichever is higher; (iii) For fruit bearing trees compensation to be calculated at market value of annual net product multiplied by the number of productive years, to be determined by the Horticulture Department. (iv) Compensation at market value of timber in case of timber-bearing trees, to be determined by the Forest Department. (vii) <i>(Item # (iii) and (iv) applies to non-titleholders)</i>	<ul style="list-style-type: none"> For tree owners other than land owners, compensation will be assessed for fruit or timber trees as per provisions in this entitlement matrix, and paid by the Executing Agency.
C. Vulnerability Assistance					
C.1	Impact on vulnerable households ¹⁸	Affected due to land acquisition, involuntary resettlement	Temporarily and/or insignificantly affected vulnerable households	On top of the entitlement specified in item A.1., vulnerable affected households facing temporary and/or insignificant adverse involuntary resettlement impact (temporary loss of income or any other adverse involuntary resettlement impact that is not significant) will receive additional cash compensation equivalent for five days of the prevalent minimum wage rate, and preferential employment in the project construction for one family member.	<ul style="list-style-type: none"> Vulnerable households to be identified during DMS as part of resettlement plan update for respective subprojects. The extent of impact will be assessed based on socio-economic survey and assistance for the vulnerable

¹⁸ Vulnerability benefits are incremental, i.e., in addition to other entitlements and benefits.

Sl. No.	Type of Loss	Application	Entitled Person/No. of Affected Persons	Compensation Entitlements ¹⁶	Remarks
			SEC households facing insignificant, adverse involuntary resettlement impacts: 2 SEC households facing temporary income loss and 4 SEC households facing tree loss.		<p>households will be accordingly determined.</p> <ul style="list-style-type: none"> All vulnerable households will be entitled to receive provision of skill training, support to receive financial grant from micro-finance institutions and preferential employment during project construction. Construction contracts will require contractors to employ specific numbers of vulnerable affected persons in their construction workforces. Representation from vulnerable affected persons will be a requirement of all committees and consultation forums for CTCRSP.
D. Other Impacts					
	Un-anticipated losses	Any other loss not identified in the matrix	Any affected person or affected entity	Unanticipated involuntary impacts will be documented and mitigated based on principles and policies of ARIPA, 2017 and ADB SPS, 2009.	<ul style="list-style-type: none"> The social safeguard personnel from PMU/PIU will ascertain the nature and extent of impact and loss and finalize the entitlements as per the resettlement policies of government and ADB and update the same into the respective resettlement plan.

95. The vulnerable affected persons or any member of the vulnerable affected family, will be selected on priority basis for works /jobs in the project construction employment and provided with additional special assistance for income restoration support.

96. Compensation Mechanism. Assistance for temporary loss of income and livelihood will be paid to the displaced persons as per the Entitlement Matrix. The computation of the loss will be based on the monthly income of the affected shop owners as stated by them during the consultation and social impact assessment conducted. Compensation may be provided for the period of disruption.

97. The payment of compensation and assistance amount to affected persons should be transferred in their bank account before the possession of land/ assets/ ROW of roads and prior to start of construction work. Identity cards will be prepared and distributed after completion of DMS.

VIII. RESETTLEMENT AND SMALL ETHNIC COMMUNITY PLAN BUDGET AND FINANCING PLAN

98. The RSECP budget is based on the entitlements outlined in the entitlement matrix and contingency provision amounting of about 20% of the total cost. PIU safeguard focal person along with RPMU safeguard personnel will be involved in facilitating the meetings for disbursement process and will facilitate by making aware about the process of opening of bank accounts for the affected persons who do not have bank accounts. The costs are conservative estimates and will be confirmed during detailed project preparation and planning. The total resettlement and small ethnic community plan cost for the contract package is **BDT 15,394,477**. PIU will issue order for release of payment to affected persons, which shall be released through electronic clearance service/National Electronic Fund Transfer (ECS/NEFT) transaction from bank, through concerned treasury of LGED. The resettlement plan budget is outlined in Table 16.

99. Details of RSECP budget estimation are as follows:

- (i) Total number of affected persons – two households (2 business owners) are identified as project affected as per transect walk and preliminary estimates during socioeconomic survey. Temporary livelihood losses are estimated to be for twenty working days (considering excavation, clearing, construction of roads) for the resettlement budget for each affected person under this project. Should actual days of disruption be higher, compensation will be as per the agreed entitlement matrix. The affected business owners identified based on preliminary design will be revalidated during DMS, and those found to be impacted will be eligible to receive compensation as per entitlement matrix.
- (ii) Six affected households will face insignificant, adverse involuntary resettlement impacts (temporary income loss or tree loss) and are also eligible to receive the vulnerability assistance. Vulnerability assistance for those temporarily impacted has been considered by CTCRSP equivalent for five days of the prevalent minimum wage rate per affected household, in accordance with the entitlement matrix.
- (iii) The average daily income of the affected business owners as recorded during the preliminary survey is BDT 722.
- (iv) A provisional shifting assistance has been considered for the affected business owners in case they are required to shift to an alternate location nearby during the construction work of the drains; shifting assistance' of BDT 15,000 will be paid to

the affected road-shop owners (if they are required to shift out of the place) temporarily to an alternate location; the shifting cost will include dismantling, reconstruction, loading, unloading and any other related cost.

- (v) Cost assessment of the trees based would be done on annual net product value multiplied by number of productive years remaining, whichever is higher. For fruit bearing trees compensation to be calculated at market value of annual net product multiplied by the number of productive years, to be determined by the Horticulture Department. Tree counting and compensation cost assessment will be done during DMS. A lumpsome cost is considered assuming 48 trees on an average along each road stretch at BDT 5000 for each tree.
- (vi) A provisional sum is included for the length of drainage proposed through 2 private land plots outside Rakhain Polli upto the outfall and 10 SEC owners for which small strips of land will be utilized for the roadside drains (about 2-3 feet), in the event that the landowners prefer negotiated settlement. The cost of third party certification which will be required whether land donation or negotiated settlement is adopted among the two private plots outside Rakhain Polli, is also included in the RSECP budget.

Table 16: Estimated RSECP Plan Budget

Sl. No.	Item Description	Unit	Number	Rate (BDT)	Total Amount (BDT)
A.	Resettlement and Rehabilitation Cost				
A.1	Compensation for income loss for 2 affected business owners for 20 working days at BDT 722 per day*	Number	2	722	28,880
A.3	Provisional shifting allowance for 2 affected business owners (only if temporary shifting is required to and from the present location)	Number	2	15,000	30,000
A.4	One-time Vulnerability assistance (2 affected vulnerable households facing temporary income loss) equivalent to five days of the prevalent minimum wage rate per affected household	Number	2	400	4,000
A.5	Compensation for trees**	Number	48	5,000	240,000
A.6	One-time Vulnerability assistance (4 affected vulnerable households facing tree loss) equivalent to five days of the prevalent minimum wage rate per affected household	Number	4	400	8,000
	Sub-total of A				310,880
B	Negotiated Settlement				

Sl. No.	Item Description	Unit	Number	Rate (BDT)	Total Amount (BDT)
B.1	Provisional sum for negotiated settlement/direct purchase of drainage alignment outside Rakhain Polli (leading to outfall)	LS			2,600,000
B.2	Provisional sum for negotiated settlement/direct purchase for road /drain from 10 SEC households				8,867,851
B.3	Third party certification	LS			300,000
	Sub-total of B				11,767,851
C	Implementation Cost				
C.1	DMS Survey for RSECP updating, ID preparation, documentation	LS			250,000.00
C.2	Baseline and endline surveys proposed under specific action plan	LS			200,000.00
C	Consultation, Grievance Redress	LS			150,000.00
C.3	Awareness Generation and Capacity Building	LS			150,000.00
	Sub-total of C				750,000
	Total = A + B + C				12,828,731
	Contingency at 20%				2,565,746
	Grand total				15,394,477

Note:

* Compensation for income loss will be based on the actual period of disruption; the number of days of disruption can be less or more than 20 days as assumed in the resettlement plan budget. The affected persons will receive compensation for the actual number of days of disruption/impact. Any additional temporary income loss assessed during construction of the subproject would be compensated from the contingency fund.

** The tree count survey will be conducted during detailed measurement survey and value of the trees will be determined by Horticulture Department for fruit trees and Forest Department for timber trees, in line with the agreed entitlement matrix of the project.

IX. INSTITUTIONAL ARRANGEMENTS AND IMPLEMENTATION SCHEDULE

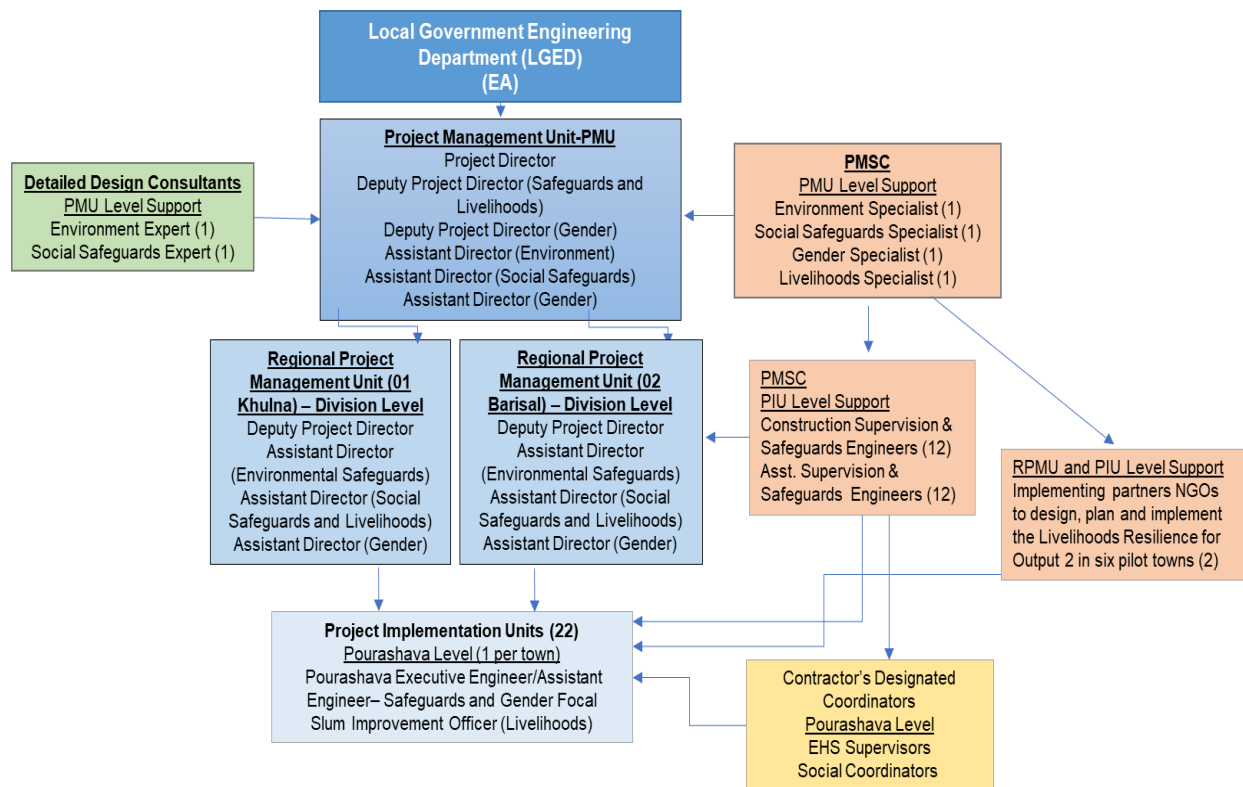
A. Implementation Arrangement

100. **Executing agencies and project management unit.** The Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) will be the Executing Agency. *Pourashavas* are the implementing agencies of the project.

101. **Project Management Unit (PMU).** The PMU will be headed by a Project Director (PD) of Chief Engineer rank, who will be responsible for overall project management. The Project Director will be supported by two Deputy Project Directors (DPDs), DPD (Safeguards) and DPD (Gender); the two DPDs will be responsible for overall safeguards and gender for the project. The PMU level safeguard and gender team will have another three safeguard and gender personal, Assistant Director (Environment), Assistant Director (Social Safeguards) and Assistant Director (Gender). These safeguards and gender Assistant Directors will be responsible for social safeguard

compliance and planning (as per the agreed resettlement framework), environmental safeguards compliance as per ADB's SPS 2009 and GOB rules and ensuring gender equality (as per Gender Action Plan) in the SCTEIP. For project implementation, two division level Regional Project Management Units (RPMUs) will be established, one at Khulna and the other at Barisal. The safeguard implementation arrangement is represented in Figure 6.

Figure 6: Safeguard Implementation Arrangement



DDC = Detailed Design Consultant; EHS = Environment, Health and Safety; PIU = Project Implementation Unit; PMSC = Project Management Supervision Consultant; PMU = Project Management Unit

102. The PMU will be supported by two institutional consultants under the supervision and control of project director, PMU: (i) the detail design consultants (DDC); (ii) the project management supervision consultants (PMSC), that will support PMU; and (iii) PMSC at the division level that will support the two RPMUs and the town-level PIUs.

103. Key tasks and responsibilities of the Assistant Director (Social Safeguard), PMU are as follows:

- (i) Ensure subprojects conform to the agreed project selection criteria for the project;
- (ii) Review and finalize project involuntary resettlement and indigenous people category;
- (iii) Oversee preparation of resettlement plans/Due Diligence Report (DDRs)/RIPP; confirm existing resettlement plans/DDRs/RIPP are updated based on detailed designs, and that new project resettlement plans/DDRs/RIPP are prepared in compliance with ADB SPS 2009 and policies, regulations of GOB for the project;

- (iv) Responsible for issuing the public notice along with project information/details as well as the project cut-off-date;
- (v) Ensure that resettlement plans/DDR are included in bidding documents and civil works contracts;
- (vi) Provide oversight on social safeguard management aspects of projects and ensure resettlement plans and impact avoidance measures outlined in the resettlement plan/environmental management plan/DDR are implemented by PIU and contractors;
- (vii) Supervise and guide the RPMUs and town/*pourashava* level PIUs to properly carry out the social safeguard monitoring;
- (viii) Ensure and monitor the provision in the contract to include the vulnerable people to be the beneficiaries of the facilities constructed under the Project;
- (ix) Facilitate and ensure compliance with all government rules and regulations regarding project implementation. Obtain No Objection Certificates, land ownership and transfer details etc. for each site, as relevant and include the same in the respective social safeguard documents for the package;
- (x) Supervise and guide the PIUs to properly carry out the social safeguard and gender monitoring (resettlement plan/Gender Action Plan);
- (xi) Review, monitor, and evaluate the effectiveness with which the resettlement plans/provisions of DDRs are implemented, and recommend corrective actions to be taken as necessary;
- (xii) Consolidate monthly social safeguard and gender monitoring reports from PIUs/PMSCs, prepare and submit semi-annual social safeguard monitoring reports (SSMR) to ADB;
- (xiii) Ensure timely disclosure of final resettlement plans/DDR/RIPP in locations and form accessible to the public and affected persons;
- (xiv) Address any grievances brought about through the grievance redress mechanism in a timely manner;
- (xv) Oversee training needs assessment of affected persons and vulnerable persons by PIUs and PMSC; coordinate training skill training activities and establish linkages with national level non-government organisations (NGOs) providing with livelihood programs, in case any permanent and significant impacts to livelihood of affected persons or impacts to vulnerable are identified;
- (xvi) Ensure effective implementation of GRM at all level;
- (xvii) Identify training needs and coordinate training activities for the PIUs/contractors/project consultants for capacity building to implement the Resettlement Plans/DDR, and GRM;
- (xviii) Coordinate database management for social safeguards implementation and monitoring; and
- (xix) Coordinate public awareness campaigns by the PIUs including resettlement provisions with the help of print and electronic media.

104. **Project Implementation.** The RPMUs will be the extended arms of the PMU at regional level. Under the guidance and overall management of the PMU the project will be implemented by the two RPMUs and town/*pourashava*-level PIUs. The participating *pourashavas* will be the implementation agencies at the town-level and will establish a PIU within the *pourashava* structure.

105. **Regional Project Management Units (RPMUs), Division Level.** Two regional project management units will be established, one at Khulna and the other at Barisal (Division level), who will be responsible for overall implementation of SCTEIP in the 22 *pourashavas*. The respective

RPMUs will be headed by Deputy Project Directors. Each RPMU will be staffed by an Assistant Director (Environment Safeguards), an Assistant Director (Social Safeguards) and an Assistant Director (Gender) who will assist the PMU safeguards and gender team in implementation of social and environment safeguard plans and gender action plan. The RPMU will undertake internal monitoring and supervision and record observations throughout the project period to ensure that the safeguards and mitigation measures are provided as intended.

106. The regional level social safeguards Assistant Director will oversee safeguards implementation by the *pourashava*/town level PIUs, coordinate public consultations, information disclosure, regulatory clearances and approvals, implementation of resettlement plans, EMP implementation, and grievance redressal.

107. The key tasks of the social safeguard Assistant Director at the RPMU-level will be as follows:

- (i) Finalize involuntary resettlement and indigenous people impact checklist and classify the project;
- (ii) Supervise PMSC to coordinate with PIUs, conduct consultations with affected persons and key stakeholders, supervise and monitor census and socio-economic surveys, detailed measurement surveys, and verification surveys of affected persons and update PMU accordingly for all subproject locations;
- (iii) Ensure and support preparation and/or updating of the resettlement plans, DDRs, RIPP by DDC and submit to PMU for review and approval and submission to ADB;
- (iv) Supervise PIUs to inform affected persons about (a) the project cut-off date; (b) public notice for the schedule of land acquisition and/or occupation; (c) entitlement matrix; and (d) compensation packages against different categories of loss and a tentative schedule of land clearing and/or acquisition for the start of civil works activities;
- (v) Coordinate valuation of assets, such as land, structures, trees and other assets by the property valuation advisory committee (PVAC). Finalize compensation packages based on proper due diligence and assessment;
- (vi) Facilitate land acquisition and compensation processes in consultation with the district administration; coordinate, supervise, and monitor the disbursement of compensation by the Deputy Commissioner's Office (cash compensation under law) and resettlement and rehabilitation compensation by the project in addition to the affected persons;
- (vii) Support PIUs to obtain no objection certificates, land documents, and third-party certifications as required for the subproject, in coordination with PIUs;
- (viii) Support PMU to include resettlement plans, and DDRs in bidding documents and civil works contracts;
- (ix) Guide PIUs to oversee implementation of avoidance and mitigation measures in the resettlement plans, DDRs by contractors, including compliance with all government rules and regulations; take necessary action for obtaining ROW;
- (x) Guide and monitor PIUs to oversee resettlement plans, DDR, and gender action plan implementation and maintenance of data for monitoring by contractors;
- (xi) Ensure vulnerable households are appropriately identified and receive compensation as stated in the entitlement matrix;
- (xii) Assist in conducting needs assessment to list skills relevant to the sector;
- (xiii) Assist to identify participants for livelihood and skilling training for women and members of other vulnerable groups;

- (xiv) Ensure that the project maintains sex disaggregated data on staff, consultants, construction workforce participation, labour and project related trainings;
- (xv) Ensure that gender focal points are nominated in town level PIUs;
- (xvi) Ensure that corrective actions are taken when necessary to ensure compliance with SPS and loan covenants;
- (xvii) Consolidate and submit monthly social monitoring reports received from PIUs to PMU;
- (xviii) Guide PIUs to conduct continuous public consultation and awareness with affected persons and other key stakeholders;
- (xix) Address any grievances brought about through the grievance redress mechanism promptly;
- (xx) Organize an induction course for the training of contractors, preparing them on RPs, DDR, and gender action plan implementation, social safeguard, and gender monitoring requirements related to mitigation measures, grievance redress mechanism and on taking immediate action to remedy unexpected adverse impacts or ineffective mitigation measures found during implementation;
- (xxi) Liaise with the district administration, and NGOs for income generation and development programs for affected people, as and when required; and
- (xxii) Assist in the implementation, monitoring, and reporting progress of gender action plan.

108. **Project Implementation units (PIUs), *Pourashava*/Town Level.** The PIUs will be established in each participating *pourshava*/ subproject town and staffed with a safeguards and gender focal person (Executive Engineer/Assistant Engineer, *pourashava*). The PIUs will be assisted and will receive support from the RPMUs environment, social and gender Assistant Directors and region level Construction Supervision and Safeguards Engineers, PMSC. The PIUs will be responsible for implementation of the IEE/resettlement plan/gender action plan. The Executive Engineer (safeguards and gender focal person) with the support of Assistant Directors (social, environment and gender), RPMU and the Construction Supervision and Safeguards Engineers, PMSC will support PMU safeguards Assistant Directors in subproject implementation. The Executive Engineer/ Assistant Engineer (safeguards and gender focal person) at PIU level will be assisted by Sub-Assistant Engineers (if available at the *pourashava* level) with the safeguard and gender tasks. The Slum Improvement Officer at the *pourashava* will be responsible for livelihood intervention tasks and responsibilities.

109. Key tasks and responsibilities on social safeguards of the PIU safeguard and gender focal person on involuntary resettlement safeguards compliance are as follows:

- (i) Assist the detailed design services consultants to communicate, consult and disclose the updated/finalized safeguards documents to the affected people acknowledgement for their endorsement;
- (ii) Implement final resettlement plans and ensure timely payment of compensation and other assistance prior the dispossession of the affected assets or the starts of civil works;
- (iii) Facilitate/ assist the detailed design consultants for the draft resettlement plan/DDR updating and preparation of safeguards documents for future subprojects;
- (iv) Support the DDC in assessing and reviewing the land availability and ownership status of the proposed subproject areas;

- (v) Inform affected persons about tentative schedule of land acquisition/occupation, entitlement matrix and compensation packages against different categories of loss, and cut-off date;
- (vi) Coordinate valuation of assets, such as land, trees of various species, etc. based on proper due diligence and assessment, prepare compensation packages;
- (vii) Coordinate, supervise and monitor disbursement of compensation;
- (viii) Liaise with Deputy Commissioner's Office to ensure timely payment of CCL and oversee any road blocks faced by the affected land owners;
- (ix) Obtain no objection certificates (NOCs), land documents, third party certifications as required for the project;
- (x) Oversee maintenance of data for monitoring, by consultants and contractors;
- (xi) Conduct social safeguards monitoring during civil works and submit monthly report to PMU;
- (xii) Take corrective actions when necessary to ensure avoidance/minimization of involuntary resettlement impacts;
- (xiii) Establish the GRC, disclose the project GRM to the affected communities and coordinate with other local government agencies for the preparation and implementation of the resettlement plan;
- (xiv) Address any grievances brought about through the project's grievance redress mechanism in a timely manner;
- (xv) Undertake day-to-day implementation of final resettlement plans and GAP action plan;
- (xvi) Ensure relevant data on implementation of gender action plan is collected and a gender-sensitive communication strategy and information, education and communication (IEC) materials are designed, illustrating key social and behavioural messages related to hygiene, sanitation, and health jointly with the communication specialist and in accordance with the gender action plan; and
- (xvii) Extend support in carrying out awareness campaigns in project towns.

110. **Project Management Supervision Consultant (PMSC).** The PMSC will provide project management and supervision services to support the Project Management Unit (PMU). PMSC will provide support to the LGED, PMU for project management and administration, construction supervision and quality control, safeguard compliance, municipal services operation and maintenance, monitoring and evaluations, and other activities as appropriate. PMSC will have an environment specialist, a social safeguard specialist (SSS) and a gender specialist.

111. The key tasks of social safeguard specialist (SSS), of PMSC (to be stationed at PMU level) are as follows:

- (i) Assist PMU to set up project management, implementation and monitoring systems and procedures;
- (ii) Assist PMU and PIUs in preparing annual work plans, detailed implementation schedule and budgets using computer-based project management tools;
- (iii) Establish a system to monitor social safeguards outcomes of the Project; including the functioning of the GRM, and prepare indicators for monitoring important parameters of safeguards;
- (iv) Take proactive action to anticipate the social safeguards aspects of the Project to avoid delays in implementation;
- (v) Ensure safeguards reports prepared by the detailed design consultants (DDC) are reviewed and approved by ADB and PMU and disclosed prior to contract award;

- (vi) Support PMU to prepare/update resettlement plan and quarterly and semi-annual social safeguard monitoring reports (SSMR) that will be appraised during project implementation;
- (vii) Support the PMU and PIUs in ensuring that the social safeguard activities are carried out in accordance with the agreed plans and frameworks;
- (viii) Ensure that the relevant measures specified in the resettlement plan will be incorporated in bidding documents and approved by ADB prior to issuance of invitation for bidding and monitor their compliance on behalf of PMU;
- (ix) Assist PMU in establishing the grievance redress mechanism, and handling any grievance and redress process and solution for safeguard complaints
- (x) Ensure monitoring of social safeguards plans and address unanticipated impacts, if any; and
- (xi) Provide training programs to PMU/PIUs/DDC/PMSC staff and contractors involved in the project implementation for strengthening their capacity in managing and monitoring social safeguards.

112. The key social safeguard tasks of Construction Supervision and Safeguard Engineer and Assistant Supervision and Safeguards Engineers to support RPMUs and PIUs, are as follows:

- (i) Assist regional PMUs and town level PIUs to implement resettlement plans/IEEs/GAP;
- (ii) Guide PIU staff and contractor's social coordinators conduct surveys, collect information, conduct site specific consultations and implementation of GAP;
- (iii) Guide and support RPMU and PIUs to announce cut-off dates, and disclose RPs to affected persons and implement RPs;
- (iv) Support RPMU and town-level PIUs in resettlement plan and GAP implementation, monitoring and reporting, and grievance resolution and reporting;
- (v) Support RPMUs to ensure (through field staff) that PIUs and contractors implement impact avoidance and mitigation measures;
- (vi) Assist town-level PIUs (through field staff) to ensure resettlement plans are implemented and all compensation paid prior to start of civil works;
- (vii) Assist in monitoring and reporting, preparation of quarterly and semi-annual reports;
- (viii) Assist in grievance resolution and reporting;
- (ix) Supervise contractors to ensure any land required temporarily during construction, is restored to original condition, post construction; and
- (x) Assist RPMUs in monitoring of socioeconomic status of affected persons, post resettlement plan implementation.
- (xi) Assists PIUs in information dissemination campaign for affected persons at the outset of resettlement plan implementation and all the comments made by the affected persons will be documented in the subproject records and summarized in subproject monitoring reports;
- (xii) Prepare periodic safeguard monitoring reports as per the format acceptable to ADB and quarterly gender action plan updates in format provided in PAM;
- (xiii) Collect relevant data on implementation of gender action plan and design gender-sensitive communication strategy in accordance with the gender action plan;
- (xiv) Extend assistance to LGED PMU in carrying out awareness campaigns focused on involving social and behavioural messages related to hygiene, sanitation, and health activities in the focus areas.

113. **Detailed Design Consultants (DDC).** The project will be supported by detailed design consultants (DDC). The DDC will be staffed by an Environment Expert and a Social Safeguard Expert. DDC will support PMU in designing and planning of subproject components. The DDC will screen all subprojects for climate resilience, conduct technical surveys and detailed studies, and prepare all engineering designs, bidding and safeguard documents. The key social safeguard tasks of the Social Safeguard Expert include:

- (i) Screen and categorize subproject components;
- (ii) Carry out baseline census and socio-economic surveys and carry out meaningful consultations for resettlement plan/RSECP/DDR;
- (iii) Ensure the contractors comply with the agreed social safeguards frameworks, resettlement plans, and due diligence reports on social safeguards for the project;
- (iv) Prepare/update existing resettlement plans/DDRs and prepare any additional draft resettlement plans, due diligence reports and prepare any new safeguard documents as and when required.

114. **Civil works contractors.** The contractor will be required to designate a Social Coordinators to (i) ensure compliance with RP and RF during civil works, and to (ii) carry out all mitigation and monitoring measures such as rebuilding of damaged structures/private property outlined in their contract.

115. The PMU and PIUs will ensure that bidding and contract documents include specific provisions requiring contractors to comply with (i) all applicable labour laws and core labour standards on (a) prohibition of child labour as defined in national legislation for construction and maintenance activities;(b) equal pay for equal work of equal value regardless of gender, ethnicity, or caste; and (c) elimination of forced labour; and with (ii) the requirement to disseminate information on COVID-19 safety protocols, sexually transmitted diseases, including HIV/AIDS, to employees and local communities surrounding the project sites. The key responsibilities of social safeguard/resettlement supervisor on social compliance are as follows:

- (i) Compliance with all government rules and regulations particularly health and safety, take necessary action for obtaining ROW;
- (ii) Implement corrective actions where ever necessary, to ensure no adverse social impacts are caused due to project implementation;
- (iii) Submit monthly progress reports to PIU;
- (iv) Conduct meaningful public consultation and awareness;
- (v) Support PIU in setting up GRM at field/site level and ensure it is fully functional; Address any grievances brought about through the grievance redress mechanism in a timely manner;
- (vi) Make sure that that induction course for the training of contractors is conducted regularly. Prepare contractors (with consultants' support) on resettlement plans/RIPP/DDR/GAP implementation, social safeguard and gender monitoring requirements related to mitigation measures, health and safety and on taking immediate action to remedy unexpected adverse impacts or ineffective mitigation measures found during the course of implementation;
- (vii) Establish working rapport and liaison with the District Administration and line departments for execution of work;
- (viii) Assist in collection of field level information required to prepare periodic safeguard monitoring reports (as asked by PIU) in a format acceptable to ADB and quarterly gender action plan updates in the format provided in PAM;

- (ix) Make sure that relevant data on implementation of gender action plan (activities assigned to contractor if any) is collected in accordance with the GAP;
- (x) Provide support in carrying out awareness campaigns in project towns/city level; and
- (xi) Ensure COVID-19 safety protocols are regularly monitored and followed at each of the construction site.¹⁹

Table 17: Institutional Roles and Responsibilities for Safeguards Implementation

Activities	Responsible Agency
Subproject Initiation Stage	
Finalization of sites/alignments for sub-project (on ground)	PMU/RPMUs/PIUs
Finalization of detail Design/implementation of Detailed Measurement Survey (DMS)	DDC/PIUs/RPMU
RSECP Preparation/ Updating Stage	
Conducting DMS Survey/Census of all affected persons; identification of poor and vulnerable APs	DDC/PIUs/RPMU
Conducting FGDs/ meetings / workshops during census surveys	PIUs/DDC/ contractor/ RPMU
Verification of survey results, vulnerable households	PMU/PMSC
Computation of compensation	DDC, PIU, PMSC, PMU
Conducting discussions/ meetings/ workshops with all affected persons and other stakeholders	PIU/ PMSC/RPMU/ Contractor
Finalising entitlements	PMU/RPMU/PIUs
Disclosure of final entitlements and compensation packages	PIU/ DDC/RPMU
Disclosure of grievance redress mechanism/process	PMU/PIU/ RPMU/PMSC
Approval of Final RSECP	PMU/ADB
RSECP Implementation Stage	
Payment of compensation	PMU/RPMU/PIU/PMSC
Consultations with affected persons during rehabilitation activities	PIU/ RPMU/Contractor
Grievance redressal	PMU/PIU/RPMU/ PMSC/Contractor
Internal monitoring	PMU/RPMU/PMSC

DDC = Detailed Design Services Consultant; ICCDC= Institutional Capacity and Community Development Consultants; PIU = Project Implementation Unit; PMSC = Project Management Supervision Consultant; PMU = Project Management Unit

B. Safeguard Capacity Development

116. The PMSC Social Safeguard Specialist along with Assistant Directors (social safeguard, environment and gender) will be responsible for development of a training program based on a capacity assessment of target participants (PMU, RPMU, PIU staff, Contractor(s)) and for implementation of the training program to build capabilities on resettlement policy, planning, mitigation measures and safeguards. The resettlement framework includes indicative training modules on safeguards. The PMSC will coordinate with PMU and PIUs on specific capacity development program.

- (i) sensitization on ADB's Policies and guidelines on social and indigenous people safeguards (ADB's Safeguard Requirement 2 and 3: Involuntary Resettlement and

¹⁹ The project will follow the COVID-19 health and safety protocols issued by the Government of Bangladesh. ADB has also shared the guidance notes on COVID-19 with its executing and implementing agencies in the DMCs (<https://www.adb.org/sites/default/files/publication/715416/covid-19-water-asia-pacific-guidance-note.pdf>)

- Indigenous Peoples) including meaningful consultation, GRM and accountability mechanism;
- (ii) introduction to the assessment of involuntary resettlement and indigenous peoples impacts and mitigation measures, including best practices, in the design, construction, operation and maintenance of water supply, sewerage, roads, and drainage subprojects;
 - (iii) preparation and review of RPs/RIPP/DDR based on preliminary design, and updating of the documents based on the final design;
 - (iv) improved coordination within nodal departments;
 - (v) disbursement of compensation, consultation; and (vi) monitoring and reporting requirement.

117. PMU and PMSC will also organize trainings PMU, RPMU, PIU staffs, DDC, contractors, *pourashava* officials preparing them on resettlement plan implementation including ADB policy, GRM, and social safeguards monitoring requirements and mitigation measures. Table 18 provides the indicative training needs assessment. The cost of trainings will be borne under the Project's capacity building program by PMU.

Table 18: Indicative Training Program

Description	Contents	Schedule	Participants
Program 1 Orientation Workshop	Module 1 – Orientation ADB Safeguard Policy Statement Government of Bangladesh policy Module 2 – Social/Environmental Assessment and Resettlement Planning/IEE Process ADB policy and process, identification of impacts and mitigation measures, RP/IEE preparation, implementation, and monitoring requirements. Incorporation of safeguards into project design and contracts. Importance of robust GRM.	1 Day	LGED officials involved in project implementation PMU, RPMUs, PIUs, <i>pourashava</i> officials
Program 2 Workshop for Contractors and Supervisory staff	IR/environmental issues during construction Implementation of RP/IEE Monitoring of RP/IEE implementation, Reporting Requirements, GRM	1 Day	PIUs, Contractors
Program 3 Experiences and Best Practices Sharing	Experiences on RP/IEE implementation, grievance redress – Issues and Challenges - Best Practices followed	1 Day (on a regular interval to be determined by PMU and PMSC)	PMU, RPMUs, PIUs PMSC, Contractors

DDC = Detailed Design Consultant; IEE = Initial Environment Examination; LGED = Local Government Engineering Department; PIU = Project Implementation Unit; PMSC = Project Management Supervision Consultant; PMU = Project Management Unit

C. Implementation Schedule

118. The project will be implemented over a period of 7 years. The RSECP implementation schedule will vary from subproject to subproject. In general, the project implementation will consist of the three major phases, namely project preparation, land acquisition (if required), and

rehabilitation of affected persons. In line with the principles laid down in this resettlement framework, the executing agency and implementing agency will ensure that project activities are synchronized between the resettlement plan implementation activities and the subproject implementation. The executing agency and implementing agency will ensure that no physical or economic displacement of affected households will occur until: (i) compensation at full replacement cost has been paid to each displaced person for project components or sections that are ready to be constructed; (ii) other entitlements listed in the resettlement plan are provided to the displaced persons; and (iii) a comprehensive income and livelihood rehabilitation program, supported by adequate budget, is in place to help displaced persons improve, or at least restore, their incomes and livelihoods.

119. All land acquisition, resettlement, and compensation for a subproject will be completed before award of civil works contracts. All land required will be provided free of encumbrances to the contractor prior to handing over of subproject sites and the start of civil works. The implementation of the resettlement plan will include: (i) identification of cut-off date and notification; (ii) verification of losses and extent of impacts; (iii) finalization of entitlements and distribution of identity cards; (iv) consultations with affected persons on their needs and priorities; and (v) resettlement, provision of compensation and assistance, and income restoration for affected persons. The expected implementation schedule for a subproject is given in Table 19.

Table 19: Schedule of RSECP Implementation

Activity	Months																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Establishment of PMU, RPMUs and PIUs	■																	
Appointment of safeguards and gender personnel	■																	
Appointment of PMSC	■																	
Appointment of DDC	■																	
Setting up of project level GRM	■																	
Census and socio-economic surveys	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Consultations and disclosure	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Confirmation of government land to be used and transfer from other departments	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Preparation of draft resettlement plan	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Review and approval of draft resettlement plan by PMU and ADB	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Finalization of design, detailed measurement survey and updating of draft resettlement plan	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Issue notice to affected persons	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Compensation and resettlement assistance	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Skills training as required	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Takeover possession of acquired property	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Internal monitoring	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Handover land to contractors	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Start of civil works	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Rehabilitation of temporarily occupied lands																		Immediately after construction work

Notes: (i) The census will be the cut-off-date for non-titled affected persons. For affected titled holders, the cut-off date is the date declaration of Section 4 Notice under ARIPA 2017. (ii) The resettlement plan will be updated based on final detailed design and affected person census and surveys. (iii) Endorsement and disclosure of finalized resettlement plans consistent with the resettlement framework to be undertaken.

X. MONITORING AND REPORTING

120. The implementation of this RSECP will be closely monitored to provide the PMU with an effective basis for assessing resettlement progress and identifying potential difficulties and problems. Monitoring will be undertaken by the PMSC, RPMUs and PMU. Monitoring will involve administrative monitoring to ensure that implementation is on schedule and problems are dealt with on a timely basis; socio-economic monitoring during and after any resettlement impact utilizing baseline information established through the detailed measurement survey of affected persons undertaken during project sub-preparation, and overall monitoring.

121. The Assistant Director (Social Safeguard) at PMU with the support of Assistant Director (Social safeguard) at RPMU and Safeguards and Gender Focal person at respective PIUs will be required to submit monthly progress reports, to be consolidated by PMSC social safeguards specialist to report the status of RSECP implementation under the project. The EA will submit semi-annual monitoring reports to ADB for review and will be published on the website. Outline of social safeguard monitoring report is provided in **Appendix 9**.

D. Internal Monitoring

122. Internal monitoring for resettlement plan implementation will be carried out during the entire project period. Regular monitoring of resettlement progress will identify potential difficulties and problem areas. Internal monitoring will be undertaken by the PMU through RPMU and PMSC for overall safeguard implementation and compliances. The *pourashava*/ town level PIU will monitor performance at ground level and implementation of resettlement plan. Monthly progress reports will be prepared by town level PIUs submit it to PMU. The PMSC on behalf of PMU will manage and supervise internal monitoring at multiple levels. Monitoring reports will document actual achievements against targets fixed and identifying reasons for shortfalls, if any. All monitoring reports will be produced within fifteen days of the end of each quarter or half-year.

123. Broadly, the monitoring system will involve:

- (i) Administrative monitoring including but not limited to: daily planning, implementation, feedback and troubleshooting, individual affected person file maintenance, progress reporting;
- (ii) Socio-economic monitoring including but not limited to: case studies, using baseline information for comparing affected person socioeconomic conditions, evacuation, demolition, salvaging materials, morbidity and mortality, communal harmony, dates for consultations, number of grievances and resolutions; and
- (iii) Impact evaluation monitoring including but not limited to income standards restored or improved.

E. Monitoring Progress of Resettlement and Small Ethnic Community Plan Implementation

124. Data from baseline socio-economic surveys undertaken during subproject preparation will provide the benchmark for monitoring to assess the progress and success of resettlement plan implementation. Monitoring will also include the following:

- (i) Communication with and documentation of feedback from affected persons;
- (ii) Information from affected persons on entitlements, options, alternative development, etc.;

- (iii) Valuation of properties and assets;
- (iv) Usage of grievance redress mechanism; and
- (v) Disbursement of compensation amounts and all assistance.

125. Monitoring will also cover the physical progress of resettlement plan implementation. This will include relocation of affected persons and affected community properties.

F. Internal Monitoring Indicators

126. The indicators for achievement of objectives during resettlement plan implementation are of two kinds:

- (i) Process Indicators. Indicating project inputs, expenditure, staff deployment, etc.; and
- (ii) Output Indicators. Indicating results in terms of numbers of affected persons compensated, area of temporarily occupied lands restored with topsoil (and other pre-project features), number of affected persons provided with skills training, etc.

127. Input and output indicators related to physical progress of the work will include items such as:

- (i) Training of PIU and other staff completed;
- (ii) Census, assets inventories, assessments and socioeconomic studies completed;
- (iii) Grievance redress procedures in-place and functionality;
- (iv) Compensation for temporary income loss paid for the actual number of days of disruption;
- (v) If shifting of businesses involved, shifting assistance paid;
- (vi) Vulnerability assistance provided;
- (vii) Compensation payments disbursed;
- (viii) Project employment provided to affected persons;
- (ix) Infrastructure rehabilitated or constructed;
- (x) Specific Action Plan activities implemented and achieved;
- (xi) SEC community is satisfied and reports having benefited from the project;
- (xii) Open and transparent processes followed for determination of landowners' preference for land donation or negotiated settlement, and third party certification obtained;
- (xiii) Monitoring and evaluation reports submitted.

128. A set of indicators will be used to monitor Program objectives. These indicators will form the basis of the monitoring and evaluation of resettlement plan implementation. The information collected through the household survey will provide benchmarks for comparison on the socioeconomic status of the affected persons in the Program implementation period. A key objective will be the estimation of the affected persons incomes and quality of lives. If monitoring and documentation done during the first 6 months of resettlement plan implementation indicate that these objectives are not being achieved, more resources will be allocated for implementation. During implementation, benchmarks and indicators will be monitored to ensure that comparisons made on socioeconomic status including income streams and not just fixed assets lost due to the subproject.

XI. FOLLOW-UP ACTION FOR RSECP UPDATING AND IMPLEMENTATION

129. The major tasks associated with the resettlement plan updating and implementation is given in the Table 20 placed below.

Table 20: Major Follow-up Tasks/Next Steps to be incorporated in the Updated RSECP

S.No	Details
1.	The draft resettlement plan will be updated with roadwise detailed measurement and revalidation census surveys upon availability of final detailed engineering design for roads and drains before award of contract.
2.	The resettlement plan will be updated with number of trees that will be impacted and valuation of the trees based on the entitlement matrix.
3.	Copies of land records and/or mouza plan will be included
4.	Google earth map demarcating the proposed road alignment must be included to the updated RSECP.
5.	(i) Any right to use land for construction of roads will be properly documented and RSECP to be updated with consent letters from landowners and legal agreements with the land owners, land records, area for which consent to use provided (without transfer of ownership). Independent third-party certification to ensure that the process was coercion free, will be included in the updated document. (ii) Likewise, the process of land donation or negotiated settlement, whichever is the preferred option of the landowners, will be documented and third party certification of such donation / negotiation process obtained and included in the updated RSECP.
6.	The updated/revised RSECP will be submitted to the ADB for approval. A 100 percent census and socio-economic survey will be undertaken to register and document the status of affected people and landowners/sellers within project areas. Detailed measurement survey will be jointly conducted by DDC, PIU and supervised by RPMU and PMU prior to start of civil construction work at the two roads proposed.
7.	ADB's approval of the updated RSECP based on the final assessment at detailed measurement survey stage needs to be obtained by the PMU, before contract award.
8.	Disclosure of cut-off-date for affected persons following DMS and same to be updated in resettlement plan.
9.	Public consultations and engagement will be carried out through the entire project planning and implementation phase. Project disclosure meeting with affected persons and preparation of project information leaflet in local language to be shared with stakeholders and affected persons.

Appendix 1: Involuntary Resettlement and Inigenous Peoples Impact Assessment with COVID-19 Screening Checklist

Involuntary Resettlement Impact Assessment

A. Introduction

1. Each subsection/section needs to be screened for any involuntary resettlement impacts which will occur or have already occurred. This screening determines the necessary action to be taken by the project team.

B. Information on subsection/section:

a. District/administrative name: Kuakata

b. Location (km): _____

c. Civil work dates (proposed): _____

d. Technical description: The Kuakata Town Roads subproject covers the improvement of existing two (2) earthen roads with total length of **0.485 km** including **0.495 km** roadside drain work using reinforced cement concrete (RCC)

C. Screening Questions for Involuntary Resettlement Impact

2. Below is the initial screening for involuntary resettlement impacts and due diligence exercise. Both permanent and temporary impacts must be considered and reported in the screening process.

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
<u>Involuntary Acquisition of Land</u>				
1. Will there be land acquisition?		√		Involuntary acquisition of private land is not envisaged for this project. The proposed roads and drains will be constructed in the existing alignment of the roads which is within the ROW. additionally, consent to use (without transfer) 2-3 feet wide strip of land for construction of roads and drains has been provided by the Rakhain households who perceive a great need for the proposed project, to benefit their businesses and provide improved roads for evacuation during disasters and access to their settlement by ambulances when required.. Outside the Rakhain Polli, a small strip of land required for connection of the drain to outfall, will pass through two vacant private plots – the required portion of vacant land will likely be obtained through negotiated settlement with third party oversight.

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
2. Is the site for land acquisition known?				Not applicable
3. Is the ownership status and current usage of land to be acquired known?			√	<p>Within Rakhain Polli: The existing road ROW as well as the proposed drain ROW is owned by Rakhain households, who have expressed need for improved roads and drainage within their settlement and therefore Rakhain households located along the proposed alignment have agreed to allow the Pourashava to use the land to provide such infrastructure, without transfer of ownership. The Rakhain households and the pourshava agree that the Pourashava will maintain the roads constructed.</p> <p>Outside Rakhain Polli: For the land required from 2 plots for drainage extension to outfall canal, while ownership is known to be private, the owners are not yet identified.</p>
4. Will easement be utilized within an existing Right of Way (ROW)?				Easement within an existing RoW will be utilized for the road component. For drainage, additional land requirement is identified, as explained above.
5. Will there be loss of shelter and residential land due to land acquisition?		√		
6. Will there be loss of agricultural and other productive assets due to land acquisition?		√		
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?		√		Loss of trees (48 no.s) on the boundaries of properties is assessed but not due to land acquisition.
8. Will there be loss of businesses or enterprises due to land acquisition?		√		Temporary economic impact is assessed (income loss) due to access disruption but not due to land acquisition
9. Will there be loss of income sources and means of livelihoods due to land acquisition?		√		
Involuntary restrictions on land use or on access to legally designated parks and protected areas				
10. Will people lose access to natural resources, communal facilities, and services?		√		

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
11. If land use is changed, will it have an adverse impact on social and economic activities?		√		
12. Will access to land and resources owned communally or by the state be restricted?		√		
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project? [] No [√] Yes [] N/A				
If yes, approximately how many? Six households (26 persons) in Rakhain Polli are anticipated to face involuntary resettlement impacts.				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? [] No [√] Yes [] N/A				
All of them (six households) belong to small ethnic communities and therefore fall under the vulnerable category. Four households (13 persons) have multiple vulnerabilities.				
Are any displaced persons from indigenous or ethnic minority groups? [] No [√] Yes [] N/A All displaced persons belong to small ethnic community (Rakhain community) and are assessed to face minor involuntary resettlement impacts.				

Indigenous Peoples Impact Assessment Checklist

KEY CONCERNS (Please provide elaborations in the "Remarks" column)	YES	NO	NOT KNOWN	Remarks
A. Indigenous Peoples/SEC Identification				
1. Are there sociocultural groups present in or using the project area who may be considered "tribes" (hill tribes, scheduled tribes, IP/SEC), "minorities" (ethnic or national minorities), or "indigenous communities"?	√			In Kaukata, there is a population of 1.6% SEC belonging to Rakhain community' a small ethnic community in Bangladesh. 25 households of SECs (103 persons) were found to be residing around the proposed roads at Kuakata. Affected households (six households) belonging to the small ethnic community are identified due to resettlement impacts.
2. Are there national or local laws or policies as well as anthropological researches/studies that consider these groups present in or using the project area as belonging to "ethnic minorities," scheduled tribes, IP/SEC, national minorities, or cultural communities?	√			
3. Do such groups self-identify as being part of a distinct social and cultural group?	√			
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?		√		
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?		√		

KEY CONCERNS (Please provide elaborations in the "Remarks" column)	YES	NO	NOT KNOWN	Remarks
6. Do such groups speak a distinct language or dialect?		√		No direct or indirect impact to the dignity, human rights, livelihood systems or natural or cultural resources of Rakhain community, is anticipated. The impact to the community will be mostly beneficial, and the proposed road improvement is anticipated to benefit 25 Rakhain community households (103 persons). A specific action plan for enhancement of project benefits to the SEC is prepared.
7. Have such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?		√		
8. Are such groups represented as "indigenous peoples," "ethnic minorities," "scheduled tribes," or "IP populations" in any formal decision-making bodies at the national or local levels?			√	
B. Identification of Potential Impacts				
9. Will the project directly or indirectly benefit or target indigenous peoples?	√			
10. Will the project directly or indirectly affect indigenous peoples' traditional sociocultural and belief practices (e.g., child-rearing, health, education, arts, and governance)?		√		
11. Will the project affect the livelihood systems of indigenous peoples (e.g., food production system, natural resource management, crafts and trade, employment status)?		√		
12. Will the project be in an area (land or territory) occupied, owned, or used by indigenous peoples, and/or claimed as ancestral domain?		√		
C. Identification of Special Requirements <i>Will the project activities include:</i>				
13. Commercial development of the cultural resources and knowledge of indigenous peoples?		√		
14. Physical displacement from traditional or customary lands?		√		
15. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, and spiritual uses that define the identity and community of indigenous peoples?		√		
16. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied, or claimed by indigenous peoples?		√		

KEY CONCERNS (Please provide elaborations in the "Remarks" column)	YES	NO	NOT KNOWN	Remarks
17. Acquisition of lands that are traditionally owned or customarily used, occupied, or claimed by indigenous peoples?		√		

COVID-19 Risk Screening for Involuntary Resettlement Impact Assessments




Risk screening questions	Yes	No	Not sure	Remarks
1. Will project preparation be affected by the inability of experts/consultants, to visit the project site because of the pandemic?		No		National and International Consultant from ADB undertook site visit for assessment of involuntary resettlement impacts, maintaining all safety protocols related to COVID-19.
2. Is the project likely to face challenges in achieving meaningful consultation because of the pandemic? If yes, please clarify the types of consultations to be affected and at what stages in social safeguards planning and implementation. <i>Examples: Project consultants are unable to travel to the project site and meet with affected people for RP planning; the project will face challenges in conducting with communities, etc.</i>		No		Consultations were undertaken by the project consultants and also the National and International Consultant with key stakeholders and affected persons, maintaining all safety measures related COVID-19.
3. Is the project likely to face challenges in preparing safeguards assessments/planning instruments and/or implementing social safeguards plans because of the pandemic? Please be as specific as you can in the remarks section. <i>Example: The project might face challenges in conducting inventory of assets/DMS, arranging for adequate valuations, or conducting other related due diligence (e.g., cadastral mapping or title search) due to COVID-19 restrictions.</i>		No		Primary surveys have been carried out and consultations undertaken during safeguard assessments. The RSECP will be implemented as per the Survey Safety Protocol attached to this document.

Appendix 2: Socioeconomic Information of the Affected Persons

S. No	Name, Contact and Address	Religion	Annual Income	House Members	Relationship	Sex	Age	Matrital Status	Education	Main Occupation	Impact
1.	Henati Mob:01792668427 NID: 7516647587336 Husband Mo. Cohen Konari Para Ward No : 7 Union : Lota Chapli Upazila: Kalapara District : Patuakhala	Rakhin Christia n	280000	Hemati	Self/Househol d head	Femal e	35	Widow	Class Six	Business	Temporar y income loss
				Usha	son	Male	20	Single	HSC	Student	
				Milen	son	Male	15	Single	SSC	Student	
2.	Mowan Mob: 01719875611 NID: 7816647587331 Konari Para Ward No : 7 Union : Lota Chapli Upazila: Kalapara District : Patuakhala	Rakhin Christia n	240000	Mowan	Self/Househol d head	Femal e	38	Widow	five	Business	Temporar y income loss
				Jojo	son	Male	20	Single	Eight	Student	
				Jolen	son	Male	18	Single	Eight	Student	
3.	Maung Win Shay Mob: 01716165893 NID: 8655482357 Father : Sama Shay Konari Para Ward No : 7 Union : Lota Chapli Upazila: Kalapara District : Patuakhala	Rakhin Christia n		Maung Win Shay	Self/Househol d head	Male	60	Married	BSS	Business	Loss of Trees: Betel nuts (19) Mahogany (3)
				Sama Shay	Wife	Femal e	50	Married	BSS	Housewife	
				Aye Maying	son	Male	24	Single	BSS	Student	
				Aung Thu Ra	Daughter	Femal e	19	Single	HSC	Student	
				Ei Phyu Chen							
4.	Maching Aey Mob: 01715306266	Rakhin Christia n	150000	Maching Aey	Self/ Self/Househol d head	Femal e	60	Widow	Five	Housewife	Loss of Trees:

S. No	Name, Contact and Address	Religion	Annual Income	House Members	Relationship	Sex	Age	Matrital Status	Education	Main Occupation	Impact
	NID: 7816647587318 Husband : Uchan Mong Konari Para Ward No : 7 Union : Lota Chapli Upazila: Kalapara District : Patuakhala			Jo-wayong	Son In Law	Male	45	Married	SSC	Business	Betel Nut (5)
				Uhkin Chen	Daughter In Law	Female	38	Married	MSS	Business	
				KhinK Hinoo	Grandson	Female	13	Single	Six	Student	
				Mim Chen	Grandson	Female	8	Single	Five	Student	
				Mim Khay	Grandson	Female	8	Single	Five	Student	
				Maching Aey	Self	Female	60	Widow	Five	Housewife	
5.	Cho-Chin Maung Mob: 01718423751 NID0412885482306 Konari Para Ward No : 7 Union : Lota Chapli Upazila: Kalapara District : Patuakhala"	Rakhin Christian	240,000	Cho-Chin Maung	Self	Male	66	Married	HSC	Business	Loss of Trees: Coconut (3) Betel nut (11)
				Shown Wong	Wife	Female	42	Married	Six	Housewife	
				Uachang Lan	son	Male	16	Single	SSC	Student	
				Cha lan	son	Male	18	Single	Five	Student	
6.	Chin Thand Mob:01703687410 NID: 7816647587278 Konari Para Ward No : 7 Union : Lota Chapli Upazila: Kalapara District : Patuakhala	Rakhin Christian	280000	Chin Thand	Self	Male	48	Married	Ten	Business	Loss of Trees: Mango (1) Coconut (1) Betel Nut (4) Tatul (1)
				Khan Khan	Wife	Female	38	Married	SSC	Housewife	
				Khan go	Son	Male	21	Single	MSS	Student	
				Mo Men Cha	Daughter	Female	11	Single	Six	Student	

Appendix 3: Photos of the Affected Persons

Name and Photos of affected People	
<p>Henati Mob:01792668427 NID : 7516647587336</p>	
<p>Mowan Mob: 01719875611 NID: 7816647587331</p>	
<p>Maching Aey Mob: 01715306266 NID: 7816647587318</p>	

Cho-Chin Maung
Mob: 01718423751
NID0412885482306



Chin Thand
Mob:01703687410
NID: 7816647587278



Maung Win Shay
Mob: 01716165893
NID: 8655482357



Appendix 5: Third-party Certification: Sample Certification Formats

This is to certify that Mr./Mrs. XXXXXXXXXXXXXXXXXXXX, (profession, designation, address) is appointed as independent third party to certify the process of negotiated purchase of plot no.....area owned by XXXXXXXXXXXX (names of owner), Who is a signatory to this certificate.It is also placed on record that none of the signatories to this certificate have any objection to appointment of xxxx as third-party witness.

Date:

Officers XX and landowners

- 1. _____
- 2. _____

I,_____of_____ (address) certify that I was witness to the process of negotiated purchase (details of plot_____from XXXXXXXXXXX landowners'names). I certify that:

- 1. The process of purchase of the said land was transparent; the landowner(s) was/were happy to sell the land for the welfare of the community.
- 2. No coercion was used in the purchase process.
- 3. Land transfer costs (registration fee and stamp duty) were borne by the government and not by the owner/donor.
- 4. All concerns expressed by the owner/donor as agreed, were addressed and no pending issues remain.
- 5. The following mitigation measures were identified and implemented /provided to the landowner.
- 6. Attached are the minutes of meetings held between project proponents and the landowner, which I was witness to.

Signed/ Name

Date: __Place: __

Encl: Minutes of meetings held between landowner and project proponents

Appendix 6: Indigenous Peoples/ Small Ethnic Community Specific Action Plan Reporting Template

This Indigenous People/SEC Specific Action Plan implementation report shall be prepared on a quarterly basis for subprojects for which RSECP is prepared. This report will be part of the quarterly progress reports/semi-annual monitoring report and will be submitted by PMSC to PMU for onward submission to ADB.

S. No	Specific Activities	Means of Verification	Responsibility	Timeline	Status/Remarks
1.	Identify and include IP/SEC households and localities in project influence area	Baseline data generated from primary data analysis*	Contractor/PMSC/Town level PIU	Year 1	
2.	Proposed benefits to IP/SEC households (from the subproject scope/DMF indicators and GAP indicators if applicable) <ol style="list-style-type: none"> 1. Number of IP/SEC Households using improved roads; 2. Number of IP/SEC Households benefited from improved drainage; 3. Participation of IP/SEC in awareness campaigns 4. Participation of eligible/targeted IP/SEC in training programs and internships 	Project documents (subproject scope/DMF indicators and GAP indicators)	Contractor/PMSC/Town level PIU/RPMU	<ol style="list-style-type: none"> 1. Year 5 onwards 2. Year 5 3. Year 1 onwards; Throughout project duration 4. Year 1-6 	IEC materials, information sharing, consultations and other activities stated in the CAPP will be culturally sensitive and appropriate when implemented;
3.	Type of consultations planned with IP/SEC households (stage of project cycle) <ol style="list-style-type: none"> 1. Pre-Construction 2. Construction 3. Post Construction 	Detailed report on consultation in MPR/QPR (as submitted by the project consultants)/ Semi-annual social monitoring	PMSC/Town level PIU/RPMU	Year 1 onwards	Consultations with SEC households will be conducted in all subproject stages which shall help in identifying any culture-specific

S. No	Specific Activities	Means of Verification	Responsibility	Timeline	Status/Remarks
	4. Other	reports with photographs			requirements and traditions like avoidance of any specific festival days, and/or other activities with cultural significance to the SEC communities during civil work; and any other SEC related issues and concerns that may be of importance to the community.
4.	Grievance Redress Mechanism established at different levels	Government order/notice/little specifying inclusion IP/SEC representation in first and third Level Grievance redress team as described in the project GRM Report related to project grievance reflected in the monitoring reports of the Project	PMU/RPMU	Year 1	The chief of the tribe or a member of the tribal council as traditional arbitrator (to ensure that traditional grievance redress systems are integrated) and an NGO/CSO working with SEC will be special invitees, when required. GRC will also ensure that grievance redress established is gender inclusive in receiving and facilitating resolution of the SEC concerns;
Monitoring – Project completion stage					
5.	End-line Survey including assessment of coverage and satisfaction levels of	End-line survey report and project	PMSC/Town level PIU	Year 6-7	

S. No	Specific Activities	Means of Verification	Responsibility	Timeline	Status/Remarks
	IP/SEC households with subproject work completed/ subproject intended benefits vs actual benefits to the IP/SEC community.	completion report (PCR)			

NOTE: *Household and Population Census 2011, BBS, may not be the sole source. Other reliable sources may be explored such as Town specific SEC data, *Pourashava*

Where applicable, the information provided in the table should be supported by detailed explanatory report, receipts, consultation, photographs and other details.

ADB = Asian Development Bank, DDC = Detailed Design Consultant, GAP = Gender Action Plan, GRC = Grievance Redress Committee, IP= Indigenous peoples, MPR = Monthly Progress Report, PIU = Project Implementation Unit, PMSC = Project Management and Supervision Consultant, PMU = Project Management Unit, QPR = Quarterly Progress Report, SEC = Small Ethnic Community

Appendix 7: Sample Monitoring Template

A semi-annual monitoring report shall be prepared on Resettlement and Indigenous Peoples Plan (RIPP) implementation and submitted to ADB by the PDMSC. It will include: (1) the list of affected persons, with compensation, if any due to each and details of compensation paid with signed receipts annexed to the report, socio-economic status and satisfaction levels of affected persons with the Resettlement and Small Ethnic Communities Plan (RSECP) implementation process, compensation and mitigation measures; (2) the list of vulnerable affected persons and additional compensation / special protection measures planned/implemented for them (e.g. assistance to obtain project construction related jobs); socio-economic status and satisfaction levels of affected persons with the Resettlement and Small Ethnic Communities Plan (RSECP) implementation process, compensation and mitigation measures; (3) list of roads for closure and actions planned / taken to minimize disturbance; (4) details of consultations held with affected persons (with number of participants by gender, issues raised, conclusion / agreement reached, actions required/taken; (5) details of grievances registered, redressed, outstanding complaints, minutes of GRM meetings held; (6) details of information disclosure and awareness generation activities, levels of awareness among target population and behaviour change, if any; and (7) any other relevant information showing Resettlement and Small Ethnic Communities Plan (RSECP) implementation progress. The following checklist may be used for overall monitoring of Resettlement and Indigenous Peoples Plan (RIPP) implementation.

	Resettlement and Small Ethnic Communities Plan (RIPP) Activities	Completed Y/N	Remarks
A. Pre-Construction Activities and Resettlement and Small Ethnic Communities Plan (RSECP) Activities			
	Approval of final Resettlement and Small Ethnic Communities Plan (RSECP) by ADB prior to contract award		
	Disclosure of final Resettlement and Small Ethnic Communities Plan (RSECP) on ADB and EA websites		
	Circulation of summary Resettlement and Small Ethnic Communities Plan (RSECP) in local languages to all stakeholders		
B. Resettlement and Small Ethnic Communities Plan (RSECP) Implementation			
	Grievance Redress Mechanism established at different levels		
	Entitlements and grievance redress procedure disclosed		
	Finalization of list of affected persons, vulnerable affected persons and compensation due		
	Finalization of list of roads for full or partial closure; mitigation measures proposed and implemented (with photographic documentation)		
	Affected persons received entitlements as per EM in resettlement plan		
	Payment of compensation, allowances and assistance (No. of affected persons)		
	Additional assistance (project-related construction jobs, if willing		

	Resettlement and Small Ethnic Communities Plan (RIPP) Activities	Completed Y/N	Remarks
	and able) for vulnerable households given (No. of vulnerable affected persons assisted)		
	Grievances No. of grievances registered No. of grievances redressed Outstanding complaints Disclosure of grievance redress statistics		
	Consultation, participation and disclosure as per Plan		
C. Monitoring			
	Survey on satisfaction levels of affected persons with Resettlement and Small Ethnic Communities Plan (RSECP) implementation completed		
D. Labour			
	Implementation of all statutory provisions on labour like health, safety, welfare, sanitation, and working conditions by Contractors. Ensuring no child labour used		
	Equal pay for equal work for men and women		

NOTE: Where applicable, the information provided in the table should be supported by detailed explanatory report, receipts and other details.

Appendix 8: Sample Project Information Leaflet

Subproject Information	Description
About the Project	ADB extended support to the Coastal Towns Climate Resilience Sector Project (CTCRSP) which will strengthen climate resilience and disaster preparedness in 22 (twenty-two) vulnerable coastal pourashavas (secondary towns) of Bangladesh. The towns were selected based on their vulnerability, population size, density, and level of past investments. The project takes a holistic and integrated approach to urban development and will (i) provide climate-resilient municipal infrastructure, and (ii) strengthen institutional capacity, local governance, and knowledge-based public awareness, for improved urban planning and service delivery considering climate change and disaster risks. Key infrastructure investments include (i) drainage, (ii) water supply, (iii) sanitation, (iv) cyclone shelters, and (v) other municipal infrastructure including emergency access roads and bridges, solid waste management, bus terminals, slum improvements, boat landings, and markets. Investments will benefit the poor and women.
Name of the EA/IA and town	EA: Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) IA: RPMU, Khulna/RPMU Barisal and PIU (xxx Pourashava) – subproject town
Proposed subproject technical details and project benefits	<i>The Kuakata Town Roads subproject covers the improvement of existing two (2) earthen roads with total length of 0.485 km including 0.495 km roadside drain work using reinforced cement concrete (RCC).</i>
Summary of subproject impacts	<p>(i) It is assessed that the construction of roads centre will not result into any significant involuntary resettlement.</p> <p>(ii) Improvement of the xxx (mention the subproject component) will cause involuntary resettlement impact in terms of xxx (e.g. temporary income loss) to xxx business owners (including xxx vulnerable affected households). It is expected the impact period for income loss will be maximum for a period of xxx days. Out of xx roads identified under the project, road side hawkers, street vendors have been identified in xxx roads (mention the number of roads where APs have been identified). The project is expected to impact xxx number of trees.</p>
Compensation and entitlements	<p>All displaced families and persons will be entitled to a combination of compensation packages and resettlement assistance depending on the nature of ownership rights on lost assets and scope of the impacts including socio-economic vulnerability of the displaced persons and measures to support livelihood restoration if livelihood impacts are envisaged. Unforeseen impacts will be mitigated in accordance with the principles outlined in Resettlement Framework (RF) prepared for the project.</p> <ul style="list-style-type: none"> • Compensation for the loss of land, crops/trees at their replacement cost; • Compensation for structures (residential/commercial) and other immovable assets at their replacement cost; • Assistance in lieu of the loss of business/wage income and income restoration assistance;

Subproject Information	Description
	<ul style="list-style-type: none"> Assistance for shifting and provision for the relocation site (if required), and rebuilding and/ or restoration of community resources/facilities Vulnerability assistance. <p>The Entitlement Matrix in the RF summarizes the types of losses and the corresponding nature and scope of entitlements; and is in compliance with National/State Laws and ADB SPS.</p>
RSECP budget	BDT 15,394,477
RSECP implementation schedule	xxx (mention the timeline for RSECP implementation)
Implementation structure	<p>The organizational chart starts with the Local Government Engineering Department (LGED) at the top. Below it is the Project Management Unit (PMU) led by a Project Director, with Deputy and Assistant Directors for Safeguards and Livelihoods, Gender, Environment, and Social Safeguards. To the left are Detailed Design Consultants (PMU Level Support) and to the right is the PMSC (PMU Level Support) with specialists in Environment, Social Safeguards, Gender, and Livelihoods. The PMU oversees two Regional Project Management Units (RPMUs) at the Division Level (01 Khulna and 02 Barisal), each with their own Deputy Project Directors and Assistant Directors. These RPMUs oversee 22 Project Implementation Units (PIUs) at the Pourashava Level. Support is provided by PMSC PIU Level Support (Construction Supervision & Safeguards Engineers) and Contractor's Designated Coordinators (Pourashava Level EHS Supervisors and Social Coordinators). An RPMU and PIU Level Support box notes that implementing partners NGOs will design, plan, and implement the Livelihoods Resilience for Output 2 in six pilot towns (2).</p>
GRM information	<p>The GRM flowchart shows an Affected Person starting a grievance. It proceeds through three levels: 1st Level Grievance (7 Days), 2nd Level Grievance (7 Days), and 3rd Level Grievance (15 Days). If a grievance is 'Not redressed' at one level, it moves to the next. Each level leads to 'Grievance Redressed & Record Keeping'. The 1st level involves the Pourashava Level PIU (Chief Executive Officer or Pourashava Secretary, Executive Engineer/Assistant Engineer, Pourashava, Administrative Officer, Municipal Ward Councilor, Social & Environmental Safeguard Focal persons, and Social Coordinator, Contractor). The 2nd level involves the Regional Project Management Unit (Division Level) (Additional Chief Engineer, Assistant Director for Environmental Safeguards, Assistant Director for Social Safeguards supported by Social Safeguard Engineers, PMSC). The 3rd level involves the PMU Level (Project Director, PMU, Deputy Project Director for Safeguards, Assistant Director for Environment, Assistant Director for Social Safeguards supported by Social & Env. Specialist, PMSC).</p>
Contact numbers of PIU, RPMU, PMU	xxx (Please add the contact details of point person)

Note: List of affected persons and entitlement matrix to be attached with this leaflet.

Appendix 9: Sample Grievance Registration Form

(To be made available both in English and Bengali)

The _____ Project welcomes complaints, suggestions, queries and comments regarding project implementation. We encourage persons with grievance to provide their name and contact information to enable us to get in touch with you for clarification and feedback. Should you choose to include your personal details but want that information to remain confidential, please inform us by writing/typing *(CONFIDENTIAL)* above your name. Thank you.

Date		Place of registration			
Contact Information/Personal Details					
Name		Gender	Female Male	Age	
Address					
Place					
Contact No.					
E-mail					
Complaint/Suggestion/Comment/Question <i>Please provide the details (who, what, where and how) of your grievance below.</i>					
If included as attachment/note/letter, please tick here:					
How do you want us to reach you for feedback or update on your comment/grievance?					

FOR OFFICE USE ONLY

Registered by: (Name of Official registering grievance)					
Mode of communication:	Application/letter	E-mail	Verbal/Telephonic	WhatsApp	
Reviewed by: (Names/Positions of Official(s) reviewing grievance)					
Action Taken:					
Whether Action Taken is Disclosed:	Yes	No			
Means of Disclosure:					

Appendix 10: Outline of Social Safeguard Monitoring Report

Following requirements of the ADB Safeguard Policy Statement (2009) and the *Operations Manual* section on safeguard policy (OM F1), borrowers/clients are required to establish and maintain procedures to monitor the status of implementation of safeguard plans and ensure progress is made toward the desired outcomes. For projects categorized as A or B in Involuntary Resettlement and/or Indigenous People, the Borrowers/clients are required to submit semiannual monitoring reports for ADB review. The level of detail and comprehensiveness of a monitoring report is commensurate with the complexity and significance of social safeguards impacts (involuntary resettlement and indigenous peoples) and with the current status of project implementation phase.

This outline can be used for periodic monitoring report (semiannual) and Resettlement and Small Ethnic Communities Plan completion report to start the civil works in the impacted areas. A safeguard monitoring report may include the following elements:

A. Executive Summary

This section provides a concise statement of project scope and impacts, key findings and recommended actions.

B. Background of the Report and Project Description

This section provides a general description of the project, including:

- Background/context of the monitoring report which includes the information on the project, project components, safeguards categorizations and general scope of the social safeguards impacts.
- Information on the implementation progress of the project activities, scope of monitoring report and requirements, reporting period, including frequency of submission and changes in project scope and adjusted safeguard measures, if applicable
- Summary table of identified impacts and the mitigation actions.

C. Scope of Impacts

- This section outlines the detail of scale and scopes of the project's safeguards impacts,
- Vulnerability status of the affected people/communities,
- Entitlements matrix and other rehabilitation measures, as applicable, as described in the approved final Resettlement and Small Ethnic Communities Plan

D. Compensation and Rehabilitation²⁰

This section describes the process and progress of the implementation of the safeguards plan and other required activities as determined in the plan. This includes:

²⁰ Depending on the status of the final detail design during the submission of the report this activity might not yet started. Provide the information on the expected date the activity to be conducted instead.

- Payment of the affected assets compensation, allowances, loss of incomes, etc. to the entitled persons;
- Provisions of other types of entitlement as described in the matrix and implementation of livelihood rehabilitation activities as determined in the plan.
- Quantitative as well as qualitative results of the monitoring parameters, as agreed in the plan, should be provided.

E. Public participation and consultation

This section describes public participation and consultations activities during the project implementation as agreed in the plan. This includes final consultations with affected persons during Resettlement and Small Ethnic Communities Plan finalization after the completion of detail design; the numbers of activities conducted; issues raised during consultations and responses provided by the project team, implementing NGOs, project supervision consultants, contractors, etc.

F. Grievance Redress Mechanism (GRM)

This section described the implementation of project GRM as design in the approved Resettlement and Small Ethnic Communities Plan. This includes evaluations of its effectiveness, procedures, complaints receive, timeliness to resolve issues/ complaints and resources provided to solve the complaints. Special attentions should be given if there are complaints received from the affected people or communities.

G. Institutional Arrangement

This section describes the actual implementation, or any adjustment made to the institutional arrangement for managing the social safeguards issues in the projects. This includes the establishment of safeguards unit/ team and appointment of staff in the executing agency/implementing agency; implementation of the GRM and its committee; supervision and coordination between institutions involved in the management and monitoring of safeguards issues, the roles of NGO and women's groups in the monitoring and implementation of the plan, if any.

H. Monitoring Results - Findings

This section describes the summary and key findings of the monitoring activities. The results are compared against previously established benchmarks and compliance status (e.g., adequacy of compensation rates and timeliness of payments, adequacy and timeliness of rehabilitation measures including serviced housing sites, house reconstruction, livelihood support measures, and training; budget for implementing EMP, Resettlement Plan, or specific action plan, timeliness and adequacy of capacity building, etc.). It also compared against the objectives of safeguards or desired outcomes documented (e.g., involuntary resettlement impacts avoided or minimized; livelihood restored or enhanced; indigenous peoples' identity, human right, livelihood systems and cultural uniqueness fully respected; indigenous peoples do not suffer adverse impacts, environmental impacts avoided or minimized, etc.). For FI projects this includes the effectiveness of the Environmental and Social Management System (ESMS) managed by the FI and its participating institutions.²¹ If noncompliance or any major gaps identified, include the recommendation of corrective action plan.

²¹ Specific for the FI projects, external agency may be required to conduct an audit of the project ESMS.

I. Compliance Status

This section will summarize the compliance status of the project activities with the loan covenants, ADB SPS (2009) on SR 2 and the approved final Resettlement and Small Ethnic Communities Plan.

J. Follow up Actions, Recommendation and Disclosure

This section describes recommendations and further actions or items to focus on for the remaining monitoring period. It also includes lesson learned for improvement for future safeguards monitoring activities. Disclosure dates of the monitoring report to the affected communities should also be included. A time-bound summary table for required actions should be included.

Appendix 1

- (i) List of Affected Persons and Entitlements
- (ii) Summary of RSECP with entitlement matrix

Appendix 2

- (i) Copies of affected persons's certification of payment (signed by the affected persons)
- (ii) Summary of minutes of meetings during public consultations
Summary of complaints received and solution status

Appendix 11: Documentation during Focus Group Discussions

Road Identification: Road No. 1

RD-1: Construction of R.C.C Access road for the Rakhain Community Chainage 0-485m

Number of Participants=15

Date: 31 January 2022

Time: 5.30 pm

Conducted by: Mamun Ar Rashid and Nazrul Islam

Designation: Resettlement Expert and Environmental Expert

Discussions held: SCTEIIIP-II Social Safeguard Expert and Resettlement Expert conducted Focus Group Discussion Meeting on 31/1/2022. The FGD meeting was attended by a group of community people including local elites. The respective Ward Councillor presided over the meeting and Environmental Expert recorded the minutes including participants' attendance. The Surveyor of Pourashava also attended the meeting.

The SCTEIIIP-II Consultant discussed on the following Points of FGDs and invited the opinions of the participants.

Social Safeguard Issues:

- (i) Position of land and trees and its ownership (check bayadalil, namjari record, dalil, etc)
- (ii) Construction of road and road side drainage system, cyclone shelter, water supply, sanitation, and other municipal infrastructures includes: access roads, bridges, solid waste management plant, bus terminal, slum improvements, boat landing/ ferry ghats, markets/growth centres etc.
- (iii) Community Support for constructing these schemes.
- (iv) Benefits from these infrastructures establishments by the community Workers Health & Safety.
- (v) Disseminate information about project implementation.

Emergency & Gender Development Issues:

- (i) Instructions for the Contractors to employ women workers with same wage scale and safeguard facilities (gloves, apron, sanitation, tube well, workers' shed equal and separate facility for men and women at work site).
- (ii) Orientation/Training Program for women groups/ workers/ women headed family heads to promote understanding of women about interrelationship between environment, sanitation, solid waste management, health and hygiene (facility) and its use.
- (iii) Advance Emergency Warning System
- (iv) Comm. Mobilization Facilitator must monitor contractors assignments for Gender development issues. Proper documentation as per LGED reporting format.
- (v) CMF must arrange gender awareness raising meetings with the TLCCs members at project /Ward level (a minimum 2 such meetings in a week)- as per LGED guideline/manual.

A total number of 20 local persons attended the Short time meeting. During question and answer session the local people hoped that the entitled persons would not be harassed unnecessarily during compensation payment.

The recommendation and suggestions of affected persons are as follows: Road Schemes:

- (i) They will be happy to have improved road communication.
- (ii) Eligible affected persons will be provided with compensation if impact is assessed
- (iii) The participants opined to be happy to have improved road communication with improved road facility in the near future by the Pourashava.
- (iv) Engage local people to construction works by their capacity.
- (v) Construction works should be completed in dry season.

The photo on FGD conduction and attendance are attached separately.



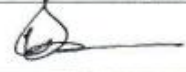
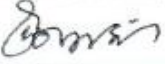
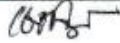
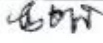
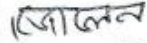

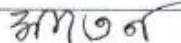
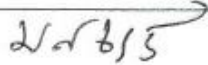
FGD Session Pictures:



**Second Coastal Towns Environmental Infrastructure Improvement Project
(SCTEIIIP-II)
Local Government Engineering Department**

Name of Pourashova: Kuakata, Rakhain Pelli ward No: 7

Date: 30/01/2022

SL	Name	Mobile No	Signature
1	ବିନୟ କୁମାର (ସମ୍ପୂର୍ଣ୍ଣ)	01722284100	
2	Mauang Lalim	01716165893	
3	ପ୍ରତାପନା ପଣ୍ଡା	01714903236	
4	ପ୍ରତାପ ସିଂହ	01728196698	
5	ବିନୟ କୁମାର	01218423251	
6	ପ୍ରତାପ	01772586181	
7	ପ୍ରତାପ	01756282799	
8	(ସମ୍ପୂର୍ଣ୍ଣ)	01792668427	
9	ସମ୍ପୂର୍ଣ୍ଣ	0186806936	
10	ସମ୍ପୂର୍ଣ୍ଣ	01703687408	
11			
12			
13			
14			
15			

Consultation with Affected Persons²² from Rakhain Community, Kuakata Pourashava

Location: Road 1, Keranipara Rakhain Polli

Date: 30.03.2022

Participants:

- Two Women Shop owners
- Household Members of Keranipara Rakhain Polli
- Councillor, Ward Number 7, Kuakata Pourashava
- Surveyor, Kuakata Pourashava
- Sub Asst. Engineer, Kuakata Pourashava
- Accountant, Kuakata Pourashava
- Project Consultant

No. of Participants: 15 (10 male and 5 female)

Key points of discussion and concerns:

- The community people are aware of the project, and very eagerly enquired when the roads will be constructed. They said that only roads will not solve their problem, drains must also be constructed to resolve their water logging problem.
- During monsoon the area remains inundated for months and its very difficult for them to walk.
- The shop owner two ladies said that they would extend and help for construction of the road. According to them if the roads improve, they will get more customers at their shops.
- The existing roads are primarily internal pathways used by the households, which were developed by living space by each of the households, it is called '*Halot*' in local language. These road stretches are not under the ownership of pourashava.
- It was explained to them by the pourashava staff and the project consultant that for construction of the drains and roads about 2.5 m width will be required. The community members said that they are ready to donate extra land required (about 2 feet) for the project, but the road work must be implemented as soon as possible.
- The trees planted by them are mostly to demarcate their boundary. These are mango, betel nut, and some low timber value trees.
- These families are related to each other.
- After construction of the road it will be maintained by pourashava, but ownership will remain with the Rakhain households.
- The community has distinct features – they speak in their local language and have their own script.

²² Including business owners facing involuntary resettlement impact and project beneficiaries



Coastal Town Climate Resilience Project (CTCRP)

Pourashava: KUAKATA Date: 30.03.2022
 Location: KERANIDARA RAKHAIN POLLE Ward No.: 7
 (for Road #1)

Sl. No.	Name	Designation	Contact Number	Signature
01	মালিক	পুলিশ	01219875611	মালিক
02	ডেপু	পুলিশ		ডেপু
03	ইন্সপেক্টর	"	01766929777	(ইন্সপেক্টর)
04	স্বাস্থ্য কর্মী	"		স্বাস্থ্য কর্মী
05	ইন্সপেক্টর	ইন্সপেক্টর		ইন্সপেক্টর
06	মালিক	ইন্সপেক্টর		মালিক
07	ইন্সপেক্টর	ইন্সপেক্টর		ইন্সপেক্টর
08	ইন্সপেক্টর	ইন্সপেক্টর	0172931086	ইন্সপেক্টর
09	ইন্সপেক্টর	ইন্সপেক্টর	01743744022	Rihana
10	ইন্সপেক্টর	"	01734858000	ইন্সপেক্টর
11	ইন্সপেক্টর	"	"	ইন্সপেক্টর
12	ইন্সপেক্টর		01703536733	ইন্সপেক্টর
13	ইন্সপেক্টর		01903684410	ইন্সপেক্টর
14	ইন্সপেক্টর			ইন্সপেক্টর

Consultation with Rakhain Community, Kuakata Pourashava

Location: Road 2, Keranipara Rakhain Market

Date: 30.03.2022

Participants:

- Eleven Shop owners of Rakhain Market
- Surveyor, Kuakata Pourashava
- Sub Asst. Engineer, Kuakata Pourashava
- Accountant, Kuakata Pourashava
- Project Consultant

No. of Participants: 15 (all male)

- The development of the road work was explained by the pourashava officials to the shop owners.
- The shop owners expressed that the road and drain must be constructed and this will benefit their business. Presently it is earthen road.
- The road width and drain width together is 4.8 meters. It was measured and found that the approach platform of the shops would not be impacted, depending on the existing ROW availability.
- The shop owners requested that their access may be maintained so that they can continue their business activities. They also mentioned that the road elevation may slightly be increased to prevent water logging.



Coastal Town Climate Resilience Project (CTCRP)

Pourashava: KULAKATA..... Date: 30.03.2022.....

Location: KERANIPARA RAHMAT BULI..... Ward No.: 7.....
(Gas Road #2)

Sl. No.	Name	Designation	Contact Number	Signature
1	ଡଃ: ଶ୍ରୀରାମଚନ୍ଦ୍ର, ଡାକ୍ତର		01916518850	ଡଃ: ଶ୍ରୀରାମଚନ୍ଦ୍ର
2	ଡଃ: ମାମୁଲୁ		01710807237	ଡଃ: ମାମୁଲୁ
3	ଡଃ: ବିଲ୍ଲବ କୁମାର		01753741140	ଡଃ: ବିଲ୍ଲବ କୁମାର
4	ଡଃ: ଉତ୍ତମ ସିଂହ		01710-783324	ଡଃ: ଉତ୍ତମ ସିଂହ
5	ଡଃ: ସୁକୁମାର		01796206580	ସୁକୁମାର
6	ଡଃ: ଅକ୍ଷୟ		01729626782	ଅକ୍ଷୟ
7	ଡଃ: ରାମଚନ୍ଦ୍ର			
8	ଡଃ: ସୁଧାଂଶୁ		01840823909	ସୁଧାଂଶୁ
9	ଡଃ: ସୁଧାଂଶୁ		00906328200	ସୁଧାଂଶୁ
10	ଡଃ: ସୁଧାଂଶୁ		02922000002	ସୁଧାଂଶୁ
11	ଡଃ: ସୁଧାଂଶୁ		0174130482	ସୁଧାଂଶୁ

Appendix 12: Survey Safety Protocol on Covid-19
Coastal Towns Climate Resilience Sector Project Socio-Economic Surveys
SURVEY SAFETY PROTOCOL ON COVID-19²³

A. Introductions

1. The ADB supported Coastal Towns Infrastructure Environmental Infrastructure Project (CTEIP) in 10 coastal towns effectively commenced on September 2014 which will be completed on June 2022. As a continuity of the project ADB extended his support to Coastal Towns Climate Resilience Sector Project (CTCRSP) which will strengthen climate resilience and disaster preparedness in 22 (twenty-two) vulnerable coastal pourashavas (secondary towns) of Bangladesh. The outcome of the project will be climate and disaster resilience of coastal towns strengthened including benefiting the poor and women. As a part of the social safeguard documents (resettlement plans), and detail measurement surveys, socio-economic survey will require to be conducted for the project locations. As the COVID-19 situation is prevailing, safety protocol for survey work has been developed addressing COVID-19.

B. About the Corona Virus Disease

2. Coronavirus disease (COVID-19) is an infectious disease caused by a newly discovered coronavirus. Most people infected with the COVID-19 virus will experience mild to moderate respiratory illness and recover without requiring special treatment. Older people and those with underlying medical problems like cardiovascular disease, diabetes, chronic respiratory disease, and cancer are more likely to develop serious illness. The COVID-19 virus spreads primarily through droplets of saliva or discharge from the nose when an infected person coughs or sneezes. At this time, there are no specific vaccines or treatments for COVID-19.²⁴ However, precautions can be implemented to prevent and slow down the transmission of the virus.

C. Common Symptoms of Corona Virus Disease²⁵

3. COVID-19 affects different people in different ways. Most infected people will develop mild to moderate illness and recover without hospitalization.

Most common symptoms:

- fever;
- dry cough;
- tiredness.

Less common symptoms:

- aches and pains;
- sore throat;
- diarrhea;
- conjunctivitis;
- headache;
- loss of taste or smell;
- a rash on the skin, or fingers or toes become pale.

²³ ADB has shared the guidance notes with its executing and implementing agencies in the DMCs, including the executing and implementing agencies for CTCRSP. <https://www.adb.org/documents/series/covid-19-asia-pacific-guidance-notes>

²⁴ World Health Organization. https://www.who.int/health-topics/coronavirus#tab=tab_1

²⁵ Footnote 21.

Serious symptoms:

- difficulty breathing or shortness of breath;
- chest pain or pressure;
- loss of speech or movement.

D. Personal Protective Equipment that should be worn by survey team of CTCRSP

4. While in the field, all the members of the survey team shall use or wear proper personal protective equipment (PPE) at all times. These PPEs may be removed on certain circumstances only, such as, but not limited to, eating, drinking, and any other task or activity that the PPE may inhibit the action. However, during these times, strict observance of social distancing is required.

5. The most common type of PPEs that should be worn by the field surveyors and enumerators are the following:

- **Reusable mask or surgical mask.** Reusable masks should be maintained clean per the manufacturer's instruction. Surgical masks should not be reused.
- **Face shield.** This PPE is especially useful for the field workers especially when talking to various people in a relatively confined space or indoors.
- **Gloves.** This is especially useful in situations in the field where items are being passed around from one hand to another, and no available hand sanitizers, or water and soap for handwashing after the activity.

E. Safety Protocol for Survey Work

1. The survey team of CTCRSP should ensure the following:

- Before undertaking the survey, ensure that the respective urban local body (ULB)/pourashava (which is also the project implementation unit) has been informed by CTCRSP about the survey.
 - Never carry out survey activities in containment zone, if any, and undertake surveys in such areas after restrictions are lifted and necessary approvals are obtained for survey work.
 - Maintain adequate stock of masks and sanitiser for survey team; and single-use surgical mask for respondents.
 - The team should have handheld contactless temperature scanner and pulse oximeter (minimum 3-sets).
- a) To test all members of the survey team every morning before starting of survey to ensure no persons are having a fever (above 100 F or 38 C) and oxygen saturation level (should be above 95).
- b) Once in the field, the head of the team should test the temperature of every respondent before assigning a team member to a particular respondent.
- The temperature of the respondent should be below above 100 F or 38 C.
 - If the temperature is high, then advise such respondents to take a rest and consult a doctor.

6. FGDs should be held only if allowed by District administration and situation permits. Otherwise, avoid FGDs.

- a) If FGDs are conducted, ensure it is held in the open, ensuring that participants are seated at least 1-meter apart.
 - b) Ensure there is no handshaking or any physical contact between participants and provide surgical mask to all participants.
 - c) Participants with fever, if any, should be asked to stay at home and not join the FGD.
7. Check daily the latest information on areas where COVID-19 is spreading and ensure no survey work is undertaken in any area declared as a containment zone.
8. Ensure no member of the survey team is in the high-risk category, those with medical conditions such as diabetes, heart, lung disease, etc. If any, counsel them and exclude them from the survey activity.
9. Ensure that no respondent with fever, cough, and cold is included in the enumeration, and collect information from some other member of the family who is in good health. If all members of the family are unwell, skip enumerating such families.
10. Mobile phones of the survey team, laptop, etc. need to be wiped with disinfectant daily on return from the field.
11. The safety protocol will be implied for the entire survey team of CTCRSP.

2. Every enumerator/Interviewer of the survey team should strictly adhere to the following safety measures

12. CTCRSP will provide an adequate number of branded N95 masks (single use only). At the end of each day, upon reaching home/place of stay, cut the mask into 2-pieces (to prevent recycling) and safely dispose of it in a separate wrapper as per Municipal Corporation guidelines.
13. The enumerator/ interviewer should have a shoulder bag for carrying the hand sanitiser, single-use surgical masks, hand towel, survey tablet, identity card, water bottle, etc.
14. He should use N95 mask before setting out of his place to survey location and should use it throughout the day, till he completes the day's survey work and returns to his place.
- a) Before putting on the mask, clean hands with alcohol-based hand sanitise or soap and water.
 - b) Cover mouth and nose with mask and make sure there are no gaps between the face and the mask.
 - c) Avoid touching the mask while using it; if it is touched, clean hands with alcohol-based hand sanitise immediately after touching the mask.
 - d) To remove the mask: remove it from behind (do not touch the front of the mask); clean hands with alcohol-based hand rub or soap and water; and wash the mask with washing soap and dry it in sunlight.
15. Before and after every household survey, clean hands thoroughly with an alcohol-based hand sanitiser, which will be provided by CTCRSP.
- a) Avoid touching eyes, mouth, and nose immediately after using the hand sanitiser, as it can cause irritation.

- b) Under no circumstance, drink or let children at home or survey-place, swallow the hand sanitizer. It can be poisonous.
 - c) Hand sanitizers recommended to protect against COVID-19 are alcohol-based and therefore can be flammable, be careful.
16. Wash hands with soap and water or using alcohol-based hand sanitiser before having tea and lunch.
17. Carry a freshly washed hand towel every day to dry your hands after washing.
18. Maintain at least 2 metre (6 feet) distance between yourself and the respondent and others during the enumeration.
- a) Since the place of the respondent to be surveyed, may be congested and it may be difficult to maintain the minimum 6-feet distance, ensure that the respondent wears a mask throughout the enumeration.
 - b) Collect and keep some single-use surgical masks from your supervisor for giving to respondents.
 - c) Request respondents to avoid crowding of other family members when the enumeration is in progress.
19. After collecting and handing over the identity cards for taking photographs, ensure that hands are cleaned using alcohol-based hand sanitiser.
20. Avoid going to crowded places during and after enumeration.
21. Avoid touching eyes, nose, and mouth until reaching home and have taken a bath.
- a) Use shampoo and wash hair thoroughly.
 - b) Wash clothes and dry them in sunlight.
 - c) All gadgets and materials used during survey should be disinfected, put in one bag and keep away from any family member, to ensure no virus is brought into the households of enumerators/surveyors.
 - d) Dispose off used face masks properly as described above. Face shields should be properly washed or disinfected as well.
22. Consume only cooked hot food and avoid consuming any packaged food.
- a) Carry drinking water and keep the body hydrated.
 - b) Drink hot water, wherever possible
23. Avoid public transport for local travel and use vehicle/motorcycle of CTCRSP (if possible) to reach survey places (settlements).
- a) If auto-rickshaw is used ensure only 2-persons travel and in taxi, 3-persons. As much as possible, avoid auto and taxi, and use motorcycle or cycle instead.
24. If someone has any minor symptoms such as cough, headache, mild fever, inform CTCRSP, and stay at home. Do not come for the survey work.
- a) At home, be isolated from others.
 - b) call the nearest government COVID-19 health care contact person and give details of your symptoms and places that is visited for survey work.

F. Important

25. CTCRSP will facilitate testing of the members for COVID-19, once they reach the destination town and the supervisors should be in self-quarantine till results come. Only after the result is known and is Negative, the survey activities should commence. If anyone tests Positive, then such a person should immediately contact the hospital and take treatment as recommended.