

# INTEGRATED SAFEGUARDS DATA SHEET

## APPRAISAL STAGE

**Report No.: ISDSA1127**

**Date ISDS Prepared/Updated:** 18-Dec-2014

**Date ISDS Approved/Disclosed:** 29-Jan-2015

### I. BASIC INFORMATION

#### 1. Basic Project Data

<b>Country:</b>	Bangladesh	<b>Project ID:</b>	P149605
<b>Project Name:</b>	Nuton Jibon Livelihood Improvement Project (P149605)		
<b>Task Team Leader(s):</b>	Frauke Jungbluth		
<b>Estimated Appraisal Date:</b>	17-Dec-2014	<b>Estimated Board Date:</b>	26-Mar-2015
<b>Managing Unit:</b>	GFADR	<b>Lending Instrument:</b>	Investment Project Financing
<b>Sector(s):</b>	General agriculture, fishing and forestry sector (40%), Other social services (20%), Public administration- Other social services (20%), Agro-industry, marketing, and trade (20%)		
<b>Theme(s):</b>	Rural services and infrastructure (40%), Participation and civic engagement (25%), Rural non-farm income generation (15%), Nutrition and food security (10%), Other rural development (10%)		
<b>Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?</b>			No
<b>Financing (In USD Million)</b>			
Total Project Cost:	220.00	Total Bank Financing:	200.00
Financing Gap:	0.00		
<b>Financing Source</b>			<b>Amount</b>
BORROWER/RECIPIENT			20.00
International Development Association (IDA)			197.02
IDA recommitted as a Credit			2.98
Total			220.00
<b>Environmental Category:</b>	B - Partial Assessment		
<b>Is this a Repeater project?</b>	Yes		

#### 2. Project Development Objective(s)

The proposed Project Development Objective is to improve livelihoods of the poor and extreme poor in the project areas.

### 3. Project Description

The target group of the project is the poor and extreme poor in the poorest upazilas of Bangladesh. The project would support an estimated 2,500 new villages in 12 districts (around 500,000 poor and hardcore poor households/2.5 million beneficiaries). The selection would be based on poverty ranking of upazilas and clustering considerations (refer to Annex 2 for a detailed description). In addition, the project will continue to work in nine districts in villages that have been supported under SIPP-II, but have not yet exited the program. So far, SIPP has supported around 652,000 poor and extreme poor households/3.2 million beneficiaries in 3,262 villages in 16 districts.

The project would consist of three components: (a) Community Institutions and Livelihood Development; (b) Business Development and Institutional Strengthening; and (c) Project Management, Monitoring and Learning and work in a total of 21 districts: (i) 9 districts will be supported with second generation activities in villages mobilized under SIPP-II; (ii) 7 districts will have ongoing SIPP-II villages and newly to be added villages; (iii) five new districts would be added (Chandpur, Comilla, Khulna, Satkhira, Shariatpur).

Component A – Community Institutions and Livelihood Development. The objective of this component is to: (i) mobilize the poor and extreme poor in selected rural communities by building and strengthening beneficiary community institutions; (ii) provide funding for small infrastructure and livelihood support for project beneficiaries; and (iii) provide nutrition awareness and agricultural production knowledge. The planning and institutional process of engaging with communities and creating and strengthening the community groups would remain largely the same as in SIPP-II. Sub-component A.1 – Development and Strengthening of Community Organizations. This sub-component provides the support needed to build institutions of the poor in the selected villages and subsequently support the strengthening and operation of these institutions. The project would largely maintain the procedures of organization, empowerment, planning and implementation of sub-projects as per the procedures established under SIPP-II. The initial community planning process would be broadened such as to include basic aspects of advanced production systems and technologies, business and market linkages, nutrition awareness, disaster risk and climate change concerns at that level to feed into the overall investment planning. This sub-component includes the set-up of SDF cluster/field offices for the mobilization and field facilitation of community organizations. This sub-component also supports the introduction and use of community based ICT tools and technologies. Sub-component A.2 – Financing of Community Plans. Community plans are financed through a village development fund. The village development fund consist of three sub-funds (i) the Institutional Development Fund (IDF) which is largely supporting the establishment and capacity building of the community groups; (ii) community financing - the so called Shabolombi Fund (SF) - that operates as a revolving fund to provide loans to beneficiaries for livelihood/income generating activities; and (iii) the Community Infrastructure Support Fund (CISF) that supports prioritized key community infrastructure that supports improved livelihoods.

Sub-component A.3 – Nutrition Awareness and Support. This sub-component would aim to raise awareness, improve attitudes and practices that enhance nutritional outcomes for targeted beneficiaries in selected project areas and that support beneficiaries in optimizing their livelihood activities. Activities proposed under the project would focus on awareness building, behavioral change for personal hygiene, food preparation, food choices and mainstreaming nutrition sensitive actions, particularly in selected income generating activities of beneficiaries. The target group for the nutrition related activities comprises largely a sub-set of project beneficiaries that are among the

core focus group for nutrition interventions – pregnant and lactating mothers and young children. Behavioral change campaigns and awareness building would be facilitated by SDF using the established community mechanism, while the activities would be outsourced to experienced players/NGOs in the intervention areas while. The project would contract agencies to train community professionals in the project areas and support village nutrition groups that will be formed by project beneficiaries. Areas to be covered under the support would be: (i) improved kitchen gardens; (ii) nutrition practices; and (iii) hand-washing. Additional support would be sought from Government institutions such as clinics and line agencies for continuous community training on nutrition related issues and improved agricultural practices.

Component B – Business Development and Institutional Strengthening. This component would aim to (i) build and strengthen producer organizations as market partners and commercially oriented entities; (ii) facilitate interaction between producers and traders/processors of products in the down- and up-stream value chains; and (iii) support market/business oriented investment to solve bottlenecks in the market chains and/or adding value to the products (e.g. poor and hardcore poor capturing a higher share in the value chain). The design of the component would built on and further develop the approaches started under the on-going SIPP-II. The component would also continue the youth employment support as provided under SIPP-II.

Sub-component B.1 – Business Partnerships Development and Market Linkages. This sub-component would aim to increase livelihood opportunities of poor and hardcore poor by organizing them in producer groups, cooperatives or federations and improving their market and business orientation and forward and backward linkages in the market systems. Various models of joint actions of small-scale individual producers working as organized producer groups would aim to raise the attractiveness of poor and hardcore poor as market partners, reduce market transaction costs and align their production decisions with business and market opportunities. These producer organizations would also facilitate services provisions to their members and act as economic entities and business partners in the down- and up-stream value chains and create additional opportunities for added value to their products. Specific objectives would be to: (i) build and strengthen producer organizations as market partners and commercially oriented entities; (ii) organize and align skill development and training in response to the specific labor market requirements; (iii) facilitate interaction between producers and traders/processors of products in the down- and up-stream value chains; and (iv) support market/business oriented investment to solve bottlenecks in the market chains and/or adding value to the products (e.g. poor and hardcore poor capturing a higher share in the value chain).

Sub-component B.2 – Second-tier Institutional Development. This sub-component aims to support the networking and aggregation of the village-level community institutions created. These second-tier institutions, called Nuton Jibon Community Societies (NJCS) are to take over the support and development function for their village institutions. The vision for these institutions is to network the village institutions and support and monitor their performance while also seeking other potential options for economic growth and service provisions for the village institutions or groups of beneficiaries. SIPP-II has already created second-tier (inter-village/second generation) institutions on the cluster and district level in four districts (Gaibandha, Jamalpur, Nilphamari, Barguna). These second-tier institutions are intended to take over most of the community support currently provide by SDF. A phase-out plan has been prepared for all SIPP-II villages by when they would enter their self-managed second tier stage. Second-tier institutions are supported by the project through an institutional development fund that helps with the start-up of the operation and allows for capacity building support. It is planned that for all SIPP-II clusters, societies will be established and phased-out within the first two years of the project.

Sub-component B.3 – Employment Generation Support. This sub-component aims to provide

opportunities for youth in the project villages to gain skills and access to employment opportunities. Finding employment for youth in rural areas is challenging for various reasons, among them (i) lack of opportunities to start businesses – the project supports youth through its skills development funding activities to start their own business; (ii) lack of information on potential employment opportunities – the project has linked with service providers that seek employees; and (iii) social norms and constraints that make it either difficult for youth to leave their villages and seek employment elsewhere or lack of exposure and experience that makes youth reluctant to venture from their villages – the project is supporting youth groups and counseling sessions that allow youth and their families to discuss such issues. SIPP-II has developed partnerships with the service sector, telecommunications, technology, garments, and agribusiness sectors, and linked with key GoB training, vocational and job creation initiatives. SIPP-II has set-up a youth data base that is being maintained. SIPP-II has also supported the formation of youth groups. These groups meet once a week to discuss common problems and identify options to be useful and participate in the local community. Counseling is also provided for the youth and their parents that have the option to obtain a job away from home but may be reluctant to leave.

Component C – Project Management, Monitoring and Learning. This component would support the management of the project, monitoring and continuous learning throughout the project period. The component would continue supporting third party monitoring and impact evaluation activities as well as build and expand on communication/presentation aspects that SIPP-II has initiated. SIPP-II has established a well-functioning Monitoring and Information System that would be built on and expanded. Information and communication technology supported feed-back mechanisms will be introduced under the proposed project to simplify and feed into existing feedback and monitoring tools.

Sub-component C.1 – Project Management. The sub-component would cover the operating costs of SDF (national, regional and district level) including salaries and office operating costs. The salaries and some of the operating costs will largely be supported by counterpart funds. SDF has reviewed its internal organization structure based on the experiences gained in SIPP-II to increase efficiency and reduce program delivery costs. The project is supporting these revised structures and arrangements which are detailed in SDF's human resource manual. The project would also continue to build on SIPP-II's established governance and accountability functions. SDF has an internal audit team that audits village institutions on a regular basis; an appraisal monitoring team that reviews if milestones have been achieved by the village to receive the next tranche payment and if plans and designs of sub-projects are adequate; a governance team that oversees governance issues, trains the village social audit committees, assesses functioning of the governance mechanisms on a regular basis, and institutes SDF's recently approved exit policy.

Sub-component C.2 – Monitoring and Learning. SIPP-II has established a web-based MIS that provides real-time information on a village level and will be continued under the proposed new project. SIPP-II has established a third party monitoring process that looks at processes and activities on a monthly basis and feeds into quarterly monitoring meetings held per region that contribute to program adjustments as needed. The project would continue to use the successful process monitoring mechanisms that have been built under SIPP-II. The project would continue building on the impact evaluation process that has been started in SIPP-II and would include a second follow-up survey for communities where the program has been active for some time and a baseline, mid-term and final survey for the new areas to be intervened in.

#### **4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)**

The ongoing project is working in a total of 16 districts (Kurigram, Rangpur, Nilphamari, Dinajpur,

Gaibandha, Naogaon, Sirajganj, Sherpur, Mymensing, Sylhet, Barisal, Patuakhali, Borguna, Bagerhat, Pirojpur) and within these districts in 51 Upazilas, 252 unions, 3262 villages. The proposed project will continue to work in these 16 districts and is likely to expand to additional 5-6 districts (to be selected). An additional 2,500 villages would be covered by expanding into other unions of districts in which the project is already active and entering into other unions in newly selected districts. The new districts have been identified as Chandpur, Comilla, Khulna, Satkhira, Shariatpur.

## 5. Environmental and Social Safeguards Specialists

Farhat Jahan Chowdhury (GENDR)

Sabah Moyeen (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>While the project designed to improve livelihood and living conditions of rural poor and extreme poor, it may have some minor impacts from small-scale local infrastructures, agriculture based livelihoods, and market facilitation. Therefore, the project is classified as a “Category B” under OP/BP 4.01 with a partial assessment as the impacts are likely to be very minor, site specific with no irreversible impacts and mitigation measures can be designed more readily.</p> <p>The implementing agency has updated the Environmental and Social Management Framework (ESMF) prepared for the SIPP-II. The updated ESMF ensures environmental management of newly incorporated interventions as well as compliance with Bank's Safeguard policies. It provides checklists as well as guidelines to carry-out sub-project specific environmental assessment and EMPs, consultations, costing, implementation, and guidelines for construction and post-construction monitoring. In addition, the ESMF will provide a negative list of attributes and interventions so that no natural habitats or physical cultural resources will be affected during the implementation of sub-projects.</p>
Natural Habitats OP/BP 4.04	Yes	<p>The project will not implement any activities inside Protected Areas (wildlife sanctuaries, national parks, etc.). It is also highly unlikely that any natural habitats formed largely by native plant and animal species would undergo transformation of use or would be affected or modified by project activities. However, as a precautionary measure, the Natural Habitat OP has been triggered. The presence of natural habitats will be assessed during the environmental screening of sub-projects. The ESMF will also include a negative list of</p>



		attributes to avoid implementing interventions in the natural habitats.
Forests OP/BP 4.36	No	No activities will be implemented inside forest areas nor will be forest planting undertaken.
Pest Management OP 4.09	Yes	Although, the project will work on soil health improvement and promote IPM technologies in the small-scale home gardening program, project beneficiaries may use pesticides on a small scale. Therefore, the OP has been triggered. The ESMF incorporates pest management guidelines and provide a negative list of pesticides. However, considering the small scale of the interventions, a separate document on the Pest Management Plan is not required.
Physical Cultural Resources OP/BP 4.11	No	It is not expected that any sub-projects to be designed and implemented by the project will affect, modify, or reverse any designated physical cultural resources.
Indigenous Peoples OP/BP 4.10	Yes	The project will likely work in areas where indigenous people live and will engage with them for the improvement of their livelihoods. SIPP-II did not trigger OP 4.10, therefore the existing ESMF has been updated to include an Indigenous People's Development Framework (IPDF) based on which specific sites will be screened and where relevant site specific Indigenous Peoples Development Plans (IPDP) will be prepared and implemented. The ESMF will also update the Communication and Inclusion sections and address gender issues and those of very vulnerable people in a more focused manner. The ESMF also includes a Grievance Redress Mechanism that is easily understandable and accessible at local levels.
Involuntary Resettlement OP/BP 4.12	No	No land acquisition or displacement of people from public or private lands is permissible under the project. This will be explicitly mentioned in the updated ESMF, as it was done for SIPP-II. The project undertakes small scale infrastructure development on vacant public lands or existing office sites; small earthen roads, culverts, tube-wells, latrines, repairs to school buildings etc. have been undertaken previously. The nature and scale of infrastructure development will largely remain the same for the proposed project. However, the updated ESMF will include additional documentation requirements for infrastructure development sub-components to demonstrate that the works are on vacant public lands and no displacement or negative impacts on livelihoods are caused due to the interventions. If lands are contributed by private parties or purchased on a willing

		buyer/willing seller basis, adequate documentation and consultation will have to be demonstrated via required reporting guidelines which will be included in the updated ESMF.
Safety of Dams OP/BP 4.37	No	T
Projects on International Waterways OP/BP 7.50	No	The OP on International Waterways has not been triggered. Being implemented in the lowest riparian country in the Ganges-Brahmaputra watershed, the project will not carry out any interventions that affect the use or pollute international waterways, particularly river or body of surface water that flows through two or more states.
Projects in Disputed Areas OP/BP 7.60	No	No activities will be implemented in disputed areas.

## II. Key Safeguard Policy Issues and Their Management

### A. Summary of Key Safeguard Issues

#### 1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

No potential large scale, significant or irreversible environmental impacts are expected to be associated to the project. Focusing on rural development through livelihood assistance, small-scale community infrastructure support and institutional development, the project would replicate most of the activities implemented in SIPP-II. SIPP-II has not had any environmental or social negative impacts associated. However, the new project would scale-up income generating activities and additionally incorporate new activities that are concentrated more on nutrition, market facilitation and value addition for sustainability. While the project is designed to improve livelihoods of the poor, some minor environmental impacts have been envisaged from small-scale local infrastructures, agriculture based livelihoods, and market facilitation. Therefore, the project is classified as a “Category B” under OP/BP 4.01 with a partial assessment as the ramifications are likely to be insignificant, site specific with no irreversible impacts and mitigation measures can be designed more readily. Natural Habitats (OP/BP 4.04) has also been triggered as a precautionary measure.

All community infrastructures, livelihoods, and value chains are subject to an environmental screening by the community and cluster team leader and will be reviewed by SDF district level officer and regional level/head office Environmental specialist. SDF’s district/regional level environmental specialist will prepare a report with mitigation measure for sub-projects with minor environmental impacts. SDF’s regional/head office environment specialist will conduct Initial Environmental Examination for sub-projects with moderately significant and potentially significant environmental impact and prepare the Environmental Management Plan (EMP). SDF will maintain a database for environmental capacity building of staff and sub-project specific environmental screening/assessment, EMP and implementation monitoring of EMP. The project M&E system will capture that information as well. An independent environment audit will be carried out at the mid-term to assess and evaluate the quality of environmental compliance of the construction related sub-projects. This will be part of the third party independent verification and

compliance check of the project.

No land acquisition or displacement of people from public or private lands or adverse impacts on livelihoods is permissible under the project. This is explicitly mentioned in the ESMF and placed on a 'negative list' as practiced under SIPP-II. Therefore OP 4.12 (Involuntary Resettlement) is not triggered for the project. The project will only undertake very small scale infrastructure development on vacant public lands or existing sites. Small earthen road upgrades, culverts, tube-wells, latrines, repairs to private school buildings etc. were undertaken under SIPP-II and the new project would do very similar small infrastructures only. While the OP is not triggered, the ESMF includes additional documentation requirements for infrastructure development sub-components to demonstrate that the works are on vacant public lands and no displacement or negative impacts on livelihoods are caused due to the interventions. If lands are contributed by private parties or purchased on a willing buyer/willing seller basis, adequate documentation and consultation will have to be demonstrated via required reporting guidelines which will be included in the updated ESMF.

Indigenous People. SIPP-II did not trigger OP 4.10 (Indigenous Peoples). The new project is expected to work in areas where indigenous people live and will engage with them for the improvement of their livelihoods. Therefore, OP 4.10 is triggered. The ESMF includes an Indigenous Peoples Development Framework (IPDF)/ Small Ethnic Community Framework (SECF), based on which project sites will be screened and where relevant, site specific Indigenous Peoples Development Plans (IPDP) or Small Ethnic Community Plans (SECP) will be prepared and implemented. A tailored consultation and communication strategy will be included in the SECP which will focus on mobilizing IPs and increasing their participation and voice in sub-project selection and design. Although most members of small ethnic communities in Bangladesh speak Bangla fluently, local languages will be used. The Grievance Redress Mechanism (GRM) incorporated in the ESMF will be easily accessible, understandable and usable by IPs and they will be well represented in the Grievance Committees.

## **2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:**

No potential indirect or long term impacts are anticipated as a result of the project as is evident through the project implementation of the SIPP program over the past eight years. As villages or communities to be upgraded are not fully identified or details of new activities or sub-projects proposed in the project that may have environmental impacts are not yet available, a framework approach has been adopted. SDF has updated the Environmental and Social Management Framework (ESMF) in consultation with concerned community, field staff and local stakeholders that provides environmental management mechanisms and tools to identify potential environmental risks in sub-projects, and procedures to mitigate any potential adverse impacts, a mechanism for environmental monitoring as well as a guideline for capacity enhancement. To ensure that project interventions are environmentally benign, the ESMF includes relevant environmental codes of practices for civil works, livelihoods and value chain operations to avert negative impacts and strengthen positive outcomes expected to be generated from the selected sub-projects. In addition, the ESMF also includes a negative list of such activities which are not eligible for project financing, to ensure that, as rural livelihood and community development intervention packages are developed, no such works would be included within the project. Considering minor application of pesticides in the small kitchen gardens or dyke gardens designed to provide nutritional support to NJLIP beneficiaries, ESMF includes a pest management guidelines and a negative list of pesticides and promote wider application of IPM.



**3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.**

No alternatives have been considered. The environmental and social screening along with the Environmental Mitigation Measures and Code of Practices will help to consider the alternative options to avoid or minimize adverse impacts at the grassroots-level planning stage. However, some interventions for environmental enhancement have been designed to reduce environmental footprint in NJLIP villages. In the livestock based producer villages, composting and vermicomposting would be incorporated as a farmer-led green entrepreneurship that would not only ensure proper management of cow dung, but add more value to the product, improve soil fertility, enhance agricultural productivity and thereby increase income of the poor community. Bio-gas would be encouraged in the livestock based producers villages where conditions and specification for this sub-project would met. Improved Cook Stoves have been initiated in some SIPP-II villages as an environmental enhancement measure which would be widely implemented in all villages to be funded under the project. In addition, aquaculture related income generating activities would incorporate vegetable plantation on the embankment/ dyke of each fish pond that are expected to improve nutrition in a family.

**4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.**

Project management would continue to be the responsibility of the existing implementation agency, the Social Development Foundation (SDF). Because of its ongoing experience of working with a Bank financed project, SDF is familiar with the Bank's safeguard policies. SDF has long experience in managing minor infrastructures and, accordingly, built institutional capacity which is evident through environmental health and safety guidelines, staffing at the PMU and training. The new project would mostly conduct similar activities as SIPP-II, but may introduce some slightly larger-scale income generating activities with producer groups. To address environmental and social safeguard issues for the proposed project, SDF will update the ESMF and build-on the recently completed staff capacity analysis and training needs assessment and provide specific training and guidelines on the safeguard frameworks for SDF headquarter, regional, district, and cluster offices.

Although SDF is familiar with the Bank's safeguard policies, SDF still needs further capacity building related to the proposed new activities like nutrition, market facilitation and value addition for sustainability. SDF will assign a specialist for environment at national, regional and district level offices. In addition, SDF will contract an environmental consultant on a retainer basis to assess on a regular basis if ESMF guidelines and procedures are adhered to and provide recommendations for additional elements to be included or required capacity building activities. In addition to the ESMF, a simple booklet on ESMF will be included in the community manuals to elaborate the process to identify and address safeguard issues in sub-projects and disseminated among the communities and field staff.

SDF has built-up sufficient understanding of social safeguards requirements and implementation. The ESMF contains a Small Ethnic Community Framework, a Gender and Inclusion Framework, an accessible and easily usable GRM and a consultation and communication strategy which will mobilize, motivate, and increase participation of women, vulnerable and marginalized groups. It also contains documentation requirements for land use by type (acquisition and all actions triggering resettlement such as removing squatters, affecting livelihoods adversely will be put on a "negative list" for the project). At community level, Social Accountability mechanisms such as functioning of Social Audit Committees, public information displays, participation in Gram

Parishad (village assembly) meetings, participatory conflict resolution system developed and used during SIPP and annual community assessment process and grading of villages are being used.
<b>5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.</b>
The draft safeguards documents (ESMF, including pest management and indigenous people's framework) have been extensively discussed with various groups of stakeholders at community, district and national level, including relevant government agencies, SDF staff at various levels, and communities.

### **B. Disclosure Requirements**

<b>Environmental Assessment/Audit/Management Plan/Other</b>	
Date of receipt by the Bank	15-Dec-2014
Date of submission to InfoShop	18-Dec-2014
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
<b>"In country" Disclosure</b>	
Bangladesh	02-Dec-2014
<i>Comments:</i> Press notice on ESMF published in "The Daily Star" and "Bangladesh Protidin" and also published on SDF's website.	
<b>Indigenous Peoples Development Plan/Framework</b>	
Date of receipt by the Bank	15-Dec-2014
Date of submission to InfoShop	18-Dec-2014
<b>"In country" Disclosure</b>	
Bangladesh	02-Dec-2014
<i>Comments:</i> Press notice on ESMF published in "The Daily Star" and "Bangladesh Protidin" and also published on SDF's website. Framework is part of the ESMF.	
<b>Pest Management Plan</b>	
Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	15-Dec-2014
Date of submission to InfoShop	18-Dec-2014
<b>"In country" Disclosure</b>	
Bangladesh	02-Dec-2014
<i>Comments:</i> Press notice on ESMF published in "The Daily Star" and "Bangladesh Protidin" and also published on SDF's website. Pest Management Plan is part of the ESMF.	
<b>If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.</b>	
<b>If in-country disclosure of any of the above documents is not expected, please explain why:</b>	

### **C. Compliance Monitoring Indicators at the Corporate Level**

<b>OP/BP/GP 4.01 - Environment Assessment</b>			
Does the project require a stand-alone EA (including EMP) report?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
<b>OP/BP 4.04 - Natural Habitats</b>			
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [ <input type="checkbox"/> ]	No [ <input checked="" type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	Yes [ <input type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input checked="" type="checkbox"/> ]
<b>OP 4.09 - Pest Management</b>			
Does the EA adequately address the pest management issues?	Yes [ <input type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Is a separate PMP required?	Yes [ <input type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?	Yes [ <input type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
<b>OP/BP 4.10 - Indigenous Peoples</b>			
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?	Yes [ <input type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input checked="" type="checkbox"/> ]
<b>The World Bank Policy on Disclosure of Information</b>			
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
<b>All Safeguard Policies</b>			
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Have costs related to safeguard policy measures been included in the project cost?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [ <input checked="" type="checkbox"/> ]   No [ <input type="checkbox"/> ]   NA [ <input type="checkbox"/> ]
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### III. APPROVALS

Task Team Leader(s):	Name: Frauke Jungbluth	
<b><i>Approved By</i></b>		
Regional Safeguards Advisor:	Name: Francis V. Fragano (RSA)	Date: 18-Dec-2014
Practice Manager/ Manager:	Name: Shobha Shetty (PMGR)	Date: 29-Jan-2015