

# INTEGRATED SAFEGUARDS DATA SHEET

## APPRAISAL STAGE

**Report No.: ISDSA7886**

**Date ISDS Prepared/Updated:** 12-Jan-2016

**Date ISDS Approved/Disclosed:** 25-Jan-2016

### I. BASIC INFORMATION

#### 1. Basic Project Data

<b>Country:</b>	Bangladesh	<b>Project ID:</b>	P130710
<b>Project Name:</b>	Pro-Poor Slums Integration Project (P130710)		
<b>Task Team Leader(s):</b>	Anna C. O'Donnell		
<b>Estimated Appraisal Date:</b>	04-Jan-2016	<b>Estimated Board Date:</b>	17-Mar-2016
<b>Managing Unit:</b>	GSU06	<b>Lending Instrument:</b>	Specific Investment Loan
<b>Sector(s):</b>	Public administration- Other social services (27%), Microfinance (18%), Other social services (25%), General water, sanitation and flood protection sector (15%), Housing construction (15%)		
<b>Theme(s):</b>	Participation and civic engagement (40%), Other social development (20%), Social Inclusion (20%), Urban services and housing for the poor (20%)		
<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:	57.50	Total Bank Financing:	50.00
Financing Gap:	0.00		
<b>Financing Source</b>			<b>Amount</b>
BORROWER/RECIPIENT			7.50
International Development Association (IDA)			50.00
Total			57.50
<b>Environmental Category:</b>	B - Partial Assessment		
<b>Is this a Repeater project?</b>	No		

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

The Project Development Objective is to improve shelter and living conditions in selected low income and informal settlements in designated municipalities in Bangladesh

### 3. Project Description

The project's components are as follows:

Component A: Community Mobilization and Planning. The objective of this component is to facilitate community-driven planning for housing projects. It will finance technical assistance in the form of community architects, social mobilizers, engineers, as well as social, environmental, and financial specialists for community organizations to prepare detailed designs and layouts for improved living conditions and shelter improvements. In addition, this component will finance land use surveys and planning for the pilot towns to identify vacant lands, if not available. The Government of Bangladesh will donate the value of its land.

Component B: Urban Community Improvements and Upgrading. This component will finance a multi-sectoral package of tertiary infrastructure and service improvements. This includes a combination of water supply, drainage, paved access, electricity, gas, sanitation services and solid waste management in a single package of upgrading works, depending on the expressed demands of the specific communities. Each participating community will determine improvement and upgrading packages that would be customized based on community preferences and needs. Where connections to municipal level infrastructure are required, this component would also finance select interventions in primary and secondary infrastructure. These investments are likely to be concentrated in terms of roads and drainage links to city level infrastructure. Finally, this component will also cover costs associated with the implementation of Environment and Social Management Plans for any works undertaken under the project.

Component C: Shelter Component and Lending. This component will finance a credit line within PKSF to provide access to Partner Organizations (POs) for investment in shelter in urban areas, and to address the current gap in shelter lending programs among qualified microfinance institutions (MFIs), lenders and/or NGOs. The component will support the development of loans for shelter improvements, new construction and cluster development, and will test different collateral and guarantee mechanisms, including community groups. The component will finance both the credit line, as well as technical assistance to PKSF and POs to develop shelter lending.

Component D: Monitoring and Evaluation and Learning. This component will support independent M&E and learning activities. This will include continuous and ongoing M&E of project results, as well as an impact evaluation. In addition, this component will finance peer-to-peer learning programs between community groups, and strengthening community networks at the town level. This component would also finance the independent supervision of any Environment and Social Management Plans, if and when applicable, to ensure compliance with World Bank guidelines. For the implementation of this component, an independent consultant or consultant team would be recruited, so as to mitigate any conflict of interest.

Component E: Project Management, TA and Training. This component will finance the project management costs for NHA, including incremental staff, audits, and expenditures incurred by each of the implementing agencies for the project, as well as for any additional costs to implement the Governance and Accountability Action Plan (GAAP). In addition, the component will finance capacity building, technical assistance and training associated with the project. NHA will contribute staff costs, inclusive of all salaries and associated benefits, to the project

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

The proposed PPSIP will be piloted in three municipalities to start (Comilla, Sirajganj, and Narayanganj), which were selected based on a multi criteria analysis: the class and population of towns, the presence of urban poverty programs and organized urban poor communities, levels of community savings in the town, willingness of the municipality and local government to participate in the project, geographical variation, etc. The project will to improve living conditions of the urban poor in selected communities across these three municipalities, through a community-driven approach. The sites have not yet been identified. The project is expected to significantly improve social and environmental outcomes for urban poor populations since each participating community will determine improvement and upgrading packages that would be customized based on community preferences and needs. PKSf will also pilot housing loan products in additional municipalities outside the initial project areas.

#### 5. Environmental and Social Safeguards Specialists

Farhat Jahan Chowdhury (GEN06)

Md. Akhtaruzzaman (GSU06)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>While the impacts of community led settlement upgrading interventions are expected to be largely beneficial, some minor to moderate impacts may occur during the construction phase which are mostly on-site and can be avoided or minimized through concerted efforts. Since the project will involve planning and implementation of multi-sectoral package of basic tertiary infrastructure and services including affordable houses for urban poor community in five secondary towns, no long term or irreversible adverse environmental impacts are envisaged. Considering the nature and magnitude of potential environmental impacts from slum upgrading infrastructures, the PPSIP has been classified as category 'B' project.</p> <p>As slums or communities to be upgraded are not fully identified or details of sub-project interventions that may have environmental impacts are not yet available, a framework approach has been adopted. The NHA developed an Environmental Management Framework (EMF) that provides tiered approach of environmental screening, tools to identify potential environmental risks in sub-projects, and measures to mitigate any potentially adverse environmental impacts, a mechanism for environmental monitoring as well as a guideline for capacity enhancement. The EMF included mitigation measures, environmental enhancement measures and a list of relevant environmental codes of practices for</p>

		<p>constructions/civil works to avert negative impacts and strengthen positive outcomes of the selected interventions. The Environmental Management Plan (EMP) to be generated for the sub-projects adopted a mechanism to incorporate the cost of mitigation measures into the project budget. In addition, the EMF has provided a negative list of attributes so that no natural habitats or physical cultural resources will be affected during the implementation of slum upgrading interventions. In general, the EMF will ensure environmental management of all interventions as well as compliance with the Bank's Safeguard policies.</p>
Natural Habitats OP/BP 4.04	Yes	<p>It is 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. It is obvious that the project will not implement any activities inside the Protected Areas (Wildlife Sanctuaries, National Parks, etc.). As settlements or communities to be upgraded in the sub-urban areas of Comilla, Narayanganj, and Sirajganj are not fully identified or details of sub-project activities and interventions that may have environmental impacts are not yet available, the Natural Habitat OP has been triggered as a precautionary measure. However, the EMF has included a negative list of attributes to avoid implementing interventions in the natural habitats. In addition, the presence of natural habitats will be assessed during the environmental screening of sub-projects</p>
Forests OP/BP 4.36	No	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	Yes	<p>Although the project sites/communities to be upgraded are not fully identified, it is highly unlikely that the design and implementation of slum upgrading interventions will affect, modify, or reverse any designated physical cultural resources located in the five secondary towns of Bangladesh. Since the PPSIP plans to implement basic infrastructure and services including affordable housing for urban poor, OP 4.11 (Physical Cultural Resources) has been triggered and the impacts will be examined as part of the environmental screening/ assessment of each sub-project when a particular site will be selected for construction. The 'Chance find' procedures conforming to local applicable legislation on heritage would be evaluated when such sites are identified during the design</p>

		phase or during the actual construction period and the related activity will not be eligible for financing under the project. However, the EMF has included a negative list of attributes to avoid impacting designated physical cultural resources or heritage sites
Indigenous Peoples OP/ BP 4.10	No	The project will cover the urban centers only. The slum areas are developed largely on vacant public lands and there is no likelihood of impacts on areas inhabited by ethnic minorities or tribal peoples.
Involuntary Resettlement OP/BP 4.12	Yes	<p>The project will develop community-based upgrading plans where tenure is secured, either on site, or through voluntary relocation to sites identified and secured for settlement upgrading under the project. All on site development will be done in a voluntary manner, and without a view to displace anyone. Temporary relocation to allow land development and civil works construction may occur in rare cases.</p> <p>Displacement of people for infrastructure development will be avoided to the extent feasible. In unavoidable circumstances, few households may need to shift their houses to allow civil works in road, walkway, drainage, etc. Resumption of public land may also be required at critical circumstances. The Project's involuntary resettlement issues will be identified only when a particular site will be selected for construction and screened for social safeguard compliance. NHA has, therefore developed a Social Management Framework (SMF) in compliance with the Bank's OP 4.12 to address social safeguard issues arising at project implementation stage and to ensure social inclusion in the process. The SMF will guide NHA to assess social impacts, and prepare Social Management Plans (SMP) including Resettlement Action Plans (RAP) in compliance with the Bank policy on social safeguards.</p>
Safety of Dams OP/BP 4.37	No	
Projects on International Waterways OP/BP 7.50	No	
Projects in Disputed Areas OP/BP 7.60	No	

## 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:**

The investment activities under the project for improvement of basic infrastructure services and upgrading community settlement for low-income urban population will be done through in-situ upgrading, re-blocking, land sharing and voluntary relocation approaches.

**In-situ upgrading and re-blocking:** In situ upgrading allows the communities to stay on site and improve their housing without any population displacement or acquisition of land. However, for re-blocking, some houses will have to be moved partially or entirely to allow space for the infrastructure. Displacement of people for infrastructure development will be avoided to the extent feasible. In unavoidable circumstances, few households may need to shift their houses to allow civil works in road, walkway, drainage, etc.

**Land sharing:** Land sharing will be adopted when an agreement is reached between slum dwellers and land owners (preferably public lands) that the slum dwellers will vacate all but a portion of the land (usually the least economically viable) in exchange for some form of right to stay on location. This will allow slum dwellers to remain in their local communities, and usually close to economic opportunities. The community and concerned households will voluntarily vacate all but a portion of the land for the land owner(s) in exchange for some form of right to stay on the location. The physical structures will be relocated and pushed back into the land portion allowed for them to stay. Some of the households and other physical establishments will be relocated temporarily for the construction period.

**Voluntary relocation:** Communities on environmentally vulnerable areas and on lands with no options to secure tenure on site, voluntary relocation and rehabilitation of community is an option for community upgrading. The communities will arrange the land through direct purchase, lease or manage through voluntary donation. The NHA may also arrange the land through involuntary acquisition, direct purchase or inter-ministerial transfer and lease out to the communities on long-term basis. This option will not involve involuntary resettlement. Should land acquisition trigger involuntary displacement of people. Involuntary acquisition of land is not expected under the project, but if it occurs, it will be done under the “The Acquisition and Requisition of Immovable Property Ordinance, 1982 (Ordinance II of 1982)”.

In all cases, where population displacement and land acquisition will be involved, the World Bank Operational Policies on Involuntary Resettlement (OP 4.12) will trigger and compensation and resettlement of affected persons will be resorted to. The NHA has developed a Social Management Framework (SMF) that provides social screening and assessment tools.

Irrespective to slum upgrading model mentioned above, the PPSIP does not expect potential large scale, significant or irreversible adverse environmental impacts considering the scale and magnitude of infrastructure investments. While the project is designed to improve living condition of urban poor, some minor environmental impacts have been envisaged from small-scale infrastructure works. Most infrastructures will take place in their original space or alignments where primary focus will be on-site and community managed small scale infrastructure. 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. The environmental safeguard policies triggered in the PPSIP are Environmental Assessment (OP4.01), Physical and Cultural Resources (OP 4.11). However, as a precaution, Natural Habitats (OP/BP 4.04) has also been triggered.



<p>The NHA has developed an Environmental Management Framework (EMF) that provided environmental screening tools and guidelines to identify potential environmental impacts and procedures to mitigate any potentially adverse environmental impacts. The EMF included a negative list of attributes in order to avoid damage or irreversible negative impacts on the environment. The main principle to be followed for selection of slums in PPSIP is “no slums or communities located in the environmentally sensitive areas or no sub-project interventions with significant and long-term environmental impacts will be recommended for implementation. Given the nature of the project, the level of development in most of the participating communities is such that the project will not engage in construction or expansion works related to sanitary landfills, large scale water and wastewater treatment plants, river rehabilitation through river training or large scale embankment construction that may affect the natural flow. The NHA will maintain a database for sub-project specific environmental screening/assessment, EMPs and implementation monitoring of EMPs. The project M&amp;E system will capture that information as well. An independent (third party) environmental audit will be carried out to assess and evaluate the quality of environmental compliance of the construction related subprojects.</p> <p>Most shelter lending will be done with a view to improve, expand or construct through self-build processes, and large scale, significant or irreversible adverse environmental impacts are also not expected. In the three pilot towns, NHA will be responsible for all construction supervision and environmental screening for housing construction, to ensure compliance with environmental safeguard policies. Outside of these areas, no construction and settlement upgrading is expected, although some housing upgrades and construction would be financed through individual housing loans. In these areas, PKSf will ensure environmental screening in line with the EMF.</p>
<p><b>2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:</b></p>
<p>No potential indirect and/or long term impacts are anticipated as a result of the project. As communities to be upgraded are not fully identified or details of new activities or sub-projects are not yet available, a framework approach has been adopted and an EMF and SMF have been developed in consultation with concerned community and local stakeholders that provides procedures to mitigate any potential adverse impacts, a mechanism for environmental monitoring as well as a guideline for capacity enhancement, as well as social assessments and monitoring. The EMF included a negative list of activities and interventions which are not eligible for project financing, to avoid potential indirect and/or long term impacts due to project interventions.</p>
<p><b>3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.</b></p>
<p>The EMF has provided provisions for alternative analysis in terms of design and location. The steps to be followed in subproject specific alternative analysis are: (a) identify and define alternatives; (b) analyze or evaluate from environmental perspective; and (c) primarily select the locally preferred and environmentally viable alternative. The environmental management process including Environmental Mitigation Measures and Code of Practices (ECoPs) will help to consider the alternative options to avoid or minimize adverse impacts at the planning stage.</p>
<p><b>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.</b></p>
<p>The NHA has adopted a Social Management Framework (SMF) and an Environmental Management Framework (EMF) to address social and environmental safeguards issues that may arise during the planning, implementation, and operation of PPSIP interventions. The National Housing Authority (NHA) under the Ministry of Housing and Public Works (MoHPW) is the</p>

implementing agency of this project for all components related to civil works. This represents their first project with the World Bank. For this reason, significant capacity building will be needed to orient staff to Bank procedures, and to better familiarize the Ministry with Bank-supported operations including compliance with social and environmental safeguards. As guided by the SMF and EMF, the NHA will ensure inclusion, community participation, transparency, and social accountability in the project cycle. A Project Management Unit (PMU) has been set up at NHA for identification, design and construction of infrastructure with participation from the selected communities. A Municipal Committee at the city level will be established comprising of representatives from the NHA, City Corporation or Pourashava, LGED and/or DPHE, and the communities. During implementation, Urban Resource Centers (URC) will be established in each town under the project for technical assistance to selected communities in subproject cycle. While the PMU will engage a Social Development Specialist for management of social issues, an Environmental Specialist will also be recruited, as per the requirement of the SMF and EMF, to ensure that PPSIP interventions with significant negative impacts are not selected and due diligence to relevant national laws of Bangladesh and IDA's safeguard policies are given throughout the implementation period. NHA will be responsible for all safeguards compliance in its project areas. Outside of these areas, minor home repairs or small scale construction will be guided by the EMF and screened by the Partners Organizations (POs) of PKSf. Since the POs do not have experience in dealing with environmental safeguards, PKSf will recruit an environmental specialist to ensure due diligence to the Government and IDA's safeguard policies by the POs to be involved in the housing program.

**5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.**

Identification, design and civil works construction for community upgrading will be all inclusive and participatory. The project will involve all social groups including women, vulnerable communities and tribal peoples. NHA will hold consultations on social and environmental safeguards at all stages of implementation of the project. Public consultations with all stakeholders, at all stages of project implementation, will be carried out and the nature and number of consultation, location, and type of participants and the summary of findings will be documented. In addition to national government agencies, key stakeholders will be consulted include affected communities, community organizations, NGOs, local elected representatives, host communities, city corporations and municipalities, Local Government and Engineering Department (LGED), Department of Public Health Engineering (DPHE) and relevant private sector agencies.

**B. Disclosure Requirements**

<b>Environmental Assessment/Audit/Management Plan/Other</b>	
Date of receipt by the Bank	22-May-2014
Date of submission to InfoShop	26-Aug-2014
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	////
<b>"In country" Disclosure</b>	
Bangladesh	17-Aug-2014
<i>Comments:</i>	
<b>Resettlement Action Plan/Framework/Policy Process</b>	
Date of receipt by the Bank	22-May-2014



Date of submission to InfoShop	26-Aug-2014
"In country" Disclosure	
Bangladesh	17-Aug-2014
<i>Comments:</i>	
<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 type="checkbox"/> ]
<b>OP/BP 4.11 - Physical Cultural Resources</b>			
Does the EA include adequate measures related to cultural property?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
<b>OP/BP 4.12 - Involuntary Resettlement</b>			
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	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"/> ]
Is physical displacement/relocation expected?	Yes [ <input type="checkbox"/> ]	No [ <input type="checkbox"/> ]	TBD [ <input type="checkbox"/> ]
Provided estimated number of people to be affected			
Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)	Yes [ <input type="checkbox"/> ]	No [ <input type="checkbox"/> ]	TBD [ <input type="checkbox"/> ]
Provided estimated number of people to be affected			
<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"/> ]

### III. APPROVALS

Task Team Leader(s):	Name: Anna C. O'Donnell	
<b><i>Approved By</i></b>		
Safeguards Advisor:	Name: Maged Mahmoud Hamed (SA)	Date: 19-Jan-2016
Practice Manager/ Manager:	Name: David Seth Warren (PMGR)	Date: 25-Jan-2016