

SFG3132

**Export Competitiveness for Jobs Project**

**Small, Ethnic and Vulnerable Communities Development Framework**

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**Ministry of Commerce**

**Government of the People's Republic of Bangladesh**

## Abbreviation

BTA	Bangladesh Tanners Association
BEIOA	Bangladesh Engineering Industry Owners Association
BEMMA	Bangladesh Electrical Merchandise Manufactures Association
BPGMEA	Bangladesh Plastic Goods Manufacturers & Exporters Association
BIDA	Bangladesh Investment Development Authority
BFLLEFA	Bangladesh Finished Leather, Leather Goods and Footwear Exporters
CCS	Consultation and Communication Strategy
CHT	Chittagong Hill Tracts
CUL	Compensation-Under-Law
DC	Deputy Commissioner
DP	Displaced Persons
EC4JP	Export Competitiveness for JOBS Project
FGD	Focused Group Discussion
GOB	Government of Bangladesh
GRC	Grievance Redress Committee
GIF	Gender and Inclusion Framework
HCG	House Construction Grant
HTG	House Transfer Grant
IDA	International Development Association
INGO	International non-government organizations
IP	Indigenous People
KII	Key Informants Interview
IPP	Indigenous Peoples Plan
LAP	Land Acquisition Proposal
MOC	Ministry of Commerce
NGO	Non-Government Organization
OP	Operation Policy
PIU	Program Implementation Unit
PCMU	Project Coordination and Monitoring Unit
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
RPF	Resettlement Policy Framework
SEVCDF	Small, Ethnic and other Vulnerable Communities Development Framework
SIA	Social Impact Assessment
SMF	Social Management Framework
TOR	Terms of Reference
WB	World Bank

### DEFINITION OF TERMS

<b>Compensation</b>	The payment given in cash or in kind to displaced persons (DPs) at replacement cost or at current market value for assets and income sources acquired or adversely affected by the project.
<b>Corridor of impact (COI)</b>	The area that would be cleared of all structures and obstructions.
<b>Cut-off date</b>	Refers to the date after which people will not be considered eligible for compensation i.e. they are not included in the list of DPs as determined by a census of persons displaced from assets and livelihoods. The cut-off-date will be disclosed to residents and local officials of each affected village which coincides with the conduct of the detailed measurement survey (DMS).
<b>Detailed measurement survey (DMS)</b>	With the use of approved detailed engineering drawings, this activity involves the finalization or validation of the results of the inventory of losses (IOL), severity of impacts, and list of DPs done during the preparation of this land acquisition and resettlement plan (LARP). The final cost of resettlement will be determined after the DMS.
<b>Displaced person (DP) /affected person (AP)</b>	Refers to any person or persons, household, firm, private or public institution who are physically displaced (relocation, loss of residential land, or loss of shelter) and/or economically displaced (loss of land, assets, access to assets, income sources, or means of livelihood) as result of i) acquisition of land; ii) restriction on land use or on access to legally designated parks and protected areas.
<b>Eminent domain/compulsory Land acquisition</b>	The right of the state using its sovereign power to acquire land for public purposes. National law establishes which public agencies have the prerogative to exercise eminent domain.
<b>Entitlement</b>	Refers to a range of measures of compensation and other forms of assistance provided to DPs/APs in the respective eligibility category.
<b>Income restoration</b>	This involves re-habilitating the sources of income and productive livelihoods of severely affected and vulnerable DPs to enable income generation equal to or, if possible, better than earned by DPs before resettlement.
<b>Inventory of losses (IOL)</b>	This is the listing of assets as a preliminary record of affected or lost assets during the preparation of the resettlement Action plan (RAP) where all fixed assets (i.e., land used for residence, commerce, agriculture; dwelling units; stalls and shops; secondary structures, such as fences, tombs, wells; standing

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crops and trees with commercial value; etc.) and sources of income and livelihood inside the COI are identified, measured, their owners identified, their exact location pinpointed, and their replacement costs calculated. The severity of impact on the affected assets and the severity of impact on the livelihood and productive capacity of the APs/DPs are likewise determined.

<b>Involuntary resettlement</b>	It is the displacement of people, not of their own volition but involuntarily, from their homes, assets, sources of income and livelihood in the COI in connection with the Project.
<b>Land acquisition</b>	Refers to the process of acquiring all or part of the land and all assets attached in the land to the ownership and possession of the parties in land need for the Project in return for compensation at replacement cost.
<b>Meaningful consultation</b>	A process that begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle. It will provide relevant and adequate information understandable and accessible to APs with a free atmosphere and gender inclusive and enables the incorporation of all relevant views of APs and other stakeholders into decision making.
<b>Relocation</b>	The physical displacement of a DP from his/her pre-project place of residence and/or business.
<b>Relocation assistance</b>	Support provided to persons who are physically displaced by a project. It may include transportation, transitional assistance (food, shelter, and social service) that are provided to the DPs during their relocation.
<b>Replacement cost</b>	Replacing an asset at cost in cash or in kind needed at a cost prevailing at the time of its acquisition. The replacement of the asset in its existing condition, without deduction of transaction costs or depreciation and salvageable materials, at prevailing market value, or its nearest equivalent, at the time of compensation payment.
<b>Resettlement</b>	Refers to various measures provided to DPs or AHs to mitigate any and all adverse social impacts of the project, including compensation, relocation (where relevant), and rehabilitation as needed.
<b>Resettlement Action plan</b>	A time-bound action plan with budget, setting out the resettlement objectives and strategies, entitlements, activities and responsibilities, resettlement monitoring, and resettlement evaluation.
<b>Severely APs</b>	This refers to APs/DPs who will (i) lose 10% or more of their total productive assets, (ii) have to relocate, and/or (iii) lose 10% or more of their total income sources due to the project.
<b>Voluntary</b>	Refers to any resettlement not attributable to forms of land acquisition backed

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**resettlement** by power of state. Important principles in voluntary resettlement are informed consent and power of choice. The persons involved are knowledgeable about a project and its implications and freely agree to participate. The persons also have the option to agree or disagree with the land acquisition, without adverse consequences being imposed by the state.

**Vulnerable groups** These are distinct groups of people who might suffer disproportionately or face the risk of being further marginalized due to the project and specifically include: (i) households that are headed by women with dependents, (ii) hh heads with disabilities, (iii) hhs falling under the generally accepted indicator for poverty, (iv) elderly households who are landless and with no other means of support, and (v) landless households.

## Executive Summary

### Introduction:

This Small Ethnic and Vulnerable Communities Development Framework (SEVCDF) aims to resolve any anticipated social safeguard issues on ethnic minorities and vulnerable communities that may arise during implementation of the Export Competitiveness for Jobs (EC4J) project in compliance with the Bank Operational Policies (OP) 4.10. Another purpose of this framework is to plan ahead the social development concerns that the project could address within its scope of works. The project is designed to help the Bangladesh private sectors mainly Leather and leather products, (leather and non-leather) footwear, plastics and light engineering sectors to increase its competitiveness in the global market by diversifying the country's export profile. Financing for the EC4J Project is provided by the International Development Association of the World Bank. The Ministry of Commerce (MoC) is responsible for overall implementation of the EC4J Project including the provisions of this SEVCDF. *Separate RPF and SMF have been prepared for this project.*

Since the locations and the nature and scale of safeguards impacts under the four sectors remain to be assessed, the issues and impacts addressed in the SEVCDF are largely based on past experience with the Bank supported projects implemented by various agencies within the Bangladesh Government. Once the Administrative Boundaries (district, upazila, union, etc.) of project area is planned, the proposed SEVCDF will provide the basis to select the exact site, assess the social safeguard issues and impacts, and prepare the necessary plans to mitigate any projected adverse impacts.

### Baseline Condition of Small Ethnic Communities

The ethnic peoples everywhere are generally poorer than the mainstream peoples. Most tribal peoples in CHT live in settlements in remote hills and valleys that are very difficult to access, they still use lands for living and livelihood under the traditional/customary tenure not recognized in the country's land administration system. The areas they inhabit, especially in CHT, are generally characterized by poor basic infrastructures like roads, schools, water supply and sanitation, health care facilities, little knowledge about climate products and its benefits.

In Rangamati and Khagrachari, substantial parts of which have long been submerged by the Kaptai Hydroelectric Project, many of the ethnic people lives on hilltops that dot the vast expanse of waters. For them small country boats are the only means of transportation to go anywhere and send their children to schools, some of which are quite far away from home. These tribal groups' presence is extremely limited in industrial sectors. It is important to engage them with the project preparation and its implementation.

Most of the tribal communities are engaged with agricultural farming. Only 2% of the tribal people are engaged with the industrial sectors. This project is a great opportunity for the tribal communities to come to the main stream and work in the industrial sectors.

### Project Impact

Project impact on land acquisition and resettlement will be minimum. A series of consultation meetings were conducted with MoC, Blue Ocean Foot-wear Ltd and Bengal Plastic Ltd where everybody expressed that project will not affect any tribal people. Tribal people will be benefited from the project as project

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will create more job opportunities. If the project requires any land, project will try to use government land or khas land. The project will avoid using any land occupied by the tribal community.

### **Grievance Mechanism and Citizen Engagement**

A two-tier bottom up GRC system will be established in this Project. First, there will be GRCs at the local level, hereafter called Local GRC (union/municipality level); and second, GRC at the project level to give room for grievances to be fairly reviewed. These GRCs will be established through gazette notifications from the Ministry. The APs will be informed through public consultation that they have a right to have their grievances redressed by the local committees as well as by the project management.

The EA/IA will ensure that tribal communities those directly affected by the project will have the chance to express their legitimate grievance or to file a complaint about the project by setting up a mechanism to address the issues raised. To ensure citizens' engagement, at least one of the member of the GRC will be tribal and it will ensure the transparency of this mechanism.

### **Implementation Arrangement and Entitlement Matrix**

Same entitlement matrix mentioned in RPF of this project will be followed for the small, ethnic and vulnerable communities. If any person belonging to a small ethnic and community is affected by the project, he/she will be recognized as vulnerable and additional grant will be compensated. Implementation Arrangement and Institutional arrangement will be the same as well mentioned in RPF. **Please see RPF for details.**

### **Public Disclosure**

If the people belonging to a small ethnic and tribal community affected by the project, project will prepare a Small, Ethnic and Vulnerable Communities' Development Plan (SEVCDP) and the Project will disclose the plan to the public in Bangladesh by posting it in its website, and authorize the World Bank to disclose it at its Country Office Information Center and in its Infoshop. The Project will also ensure that copies of the translated document are made available at its headquarters and site offices established during the implementation period. As to disclosure, Project will inform the public through notification in two national newspapers (Bangla and English) about the EC4J project and where it could be accessed for review and comments

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### 1. Background

This Small Ethnic and Vulnerable Communities' Development Framework (SEVCDF) aims to resolve any anticipated social safeguard issues on small ethnic and vulnerable communities that may arise during implementation of the Export Competitiveness for Jobs (EC4J) project in compliance with the Bank Operational Policies (OP) 4.10. Another purpose of this framework is to plan ahead the social development concerns that the project could address within its scope of works. The project is designed to help the Bangladesh private sectors mainly Leather and leather products, (leather and non-leather) footwear, plastics and light engineering sectors to increase its competitiveness in the global market by diversifying the country's export profile. Financing for the EC4J Project is provided by the International Development Association of the World Bank. The Ministry of Commerce (MoC) is responsible for overall implementation of the ECFJ Project including the provisions of this SEVCDF. *Separate RPF and SMF have also been prepared for this project.*

Since the locations and the nature and scale of safeguards impacts under the four sectors remain to be assessed, the issues and impacts addressed in the SEVCDF are largely based on past experience with the Bank supported projects implemented by various agencies within the Bangladesh Government. Once the Administrative Boundaries (district, upazila, union, etc.) of project area is planned, the proposed SEVCDF will provide the basis to select the exact site, assess the social safeguard issues and impacts, and prepare the necessary plans to mitigate any projected adverse impacts.

### 2. Demographic Profile of Small Ethnic Communities

With a population of some 160 million and a land area of approximately 144000 square kilometers, Bangladesh is densely populated. It is the third largest Muslim majority country of the world. Over 85% of the population is Bengali Muslims; the remaining 15% are Hindu, with a very small numbers are Christians and Buddhists. Ethnic and vulnerable communities comprise about less than 1% (3 million) of the population of Bangladesh living mainly in the Chittagong Hill Tracts (CHT) and in rural communities in Mymensingh, Sylhet, Dinajpur and Rajshahi. There are 45 recognized distinct different ethnic groups living in 28 districts of Bangladesh. Of the 45 tribes 13 are living in 3 CHT districts: Khagrachari, Rangamati and Bandarban. The 13 small ethnic groups in CHT possess separate identities, specific racial backgrounds, different languages, and distinct heritage and culture. The largest groups are the Chakmas, Marmas, and Tripuras. They differ in their social organization, marriage customs, birth and death rites, food and other social customs from the people of the rest of the country. The other 32 ethnic communities are scattered in 25 districts although there is good concentration of Garos in greater Mymensingh and Gazipur and of Santals in greater Rajshahi district. There is lack of information on their socioeconomic indicators. Ethnic communities largely speak Tibeto-Burman languages.

### 3. Baseline Condition of Small Ethnic Communities

The ethnic peoples everywhere are generally poorer than the mainstream people. Most minority peoples in CHT live in settlements in remote hills and valleys that are very difficult to access, they still use lands for living and livelihood under the traditional/customary tenure not recognized in the country's land administration system. The areas they inhabit, especially in CHT, are generally characterized by poor basic infrastructures like roads, schools, water supply and sanitation, health care facilities etc.

In Rangamati and Khagrachari, substantial parts of which have long been submerged by the Kaptai

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Hydroelectric Project, many of the ethnic people lives on hilltops that dot the vast expanse of water. For them small country boats are the only means of transportation to go anywhere and send their children to schools, some of which are quite far away from home. These small ethnic groups' participation is really minimum in industrial sectors. It is important to engage them with the project preparation and its implementation.

Most of the small ethnic communities are engaged with agricultural farming. Only 2% of these people are engaged with the industrial sectors. This project is a great opportunity for these communities to come to the mainstream and work in the industrial sectors.

### 4. Objectives of SEVCDF

The SEVCDF is based on the World Bank's Operational Policy 4.10 and is applicable to all sites with the presence of small ethnic community populations. The main objectives of SEVCDF are to:

- Ensure the project activities and interventions uphold the social and cultural norms and practices of the small ethnic and other vulnerable communities.
- Ensure that the project engages with the small ethnic communities in a free, prior and informed consultation through processes that are appropriate to the local institutional context, ensuring that their participation is meaningful in the entire process of preparation, implementation and monitoring of the sub projects and related activities
- Ascertain that the project does not inadvertently lead to or induce disempowerment, or increase disparities between the small ethnic community/other vulnerable and 'mainstream' communities
- Avoid, minimize and/or mitigate any kind of adverse impacts on small ethnic community households, including on their livelihoods;
- Establish appropriate strategies for information sharing, communication, training and decision-making with the different small ethnic communities (women and men) at all stages of the project
- Ensure that the project benefits and investments are equally accessible to the small ethnic groups and other vulnerable communities inhabiting the project area

Most of the small ethnic community people are small in number. Given that there is a small presence of the small ethnic community people, the SEVCDF will be incorporated within the overall project design. The need for a SEVCDF will be established at the project preparation on the basis of screening using the following criteria:

- Presence of small ethnic community and other vulnerable communities in the target project cities.
- Adverse impacts on customary rights of use and access to land and natural resources, including common area and grazing lands
- Negative impacts on socio-economic or cultural identity of small ethnic community or other sub-groups.
- Impacts that may undermine indigenous knowledge and customary institutions
- Focused consultations with small ethnic community and other vulnerable communities on interventions

### 5. Defining the small ethnic communities

No single definition can capture the diversity of the small ethnic communities, as they are found in varied

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and changing contexts. As such, Project will use the World Bank and other development partners' guidelines to identify these people in particular geographic areas by examining the following characteristics.

- Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- Customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and
- A language of their own, often different from the official language of the country or region.

A group that has lost collective attachment to geographically distinct habitats or ancestral territories in the project area because of forced severance also remains eligible for coverage under World Bank's safeguard policy. Table 01 shows the distribution of 45 indigenous communities living in 28 districts of the country.

*Table 01: Location of small ethnic communities in Bangladesh*

SI.No	Location	Small Ethnic Community	SI.No	Location	Small Ethnic Community
1.	Mymensingh, Tangail, Netrokona, Jamalpur and Sherpur district	Koch, Barman, Dalu, Hodi, Banai, Rajbangshi, Garo, Hajong	5.	Sumangonj, Mouvlibazar, Sylhet, Hobigonj district	Monipuri, Khasia, Garo, Hajong, Patro, Khasia, Santal, Oraon
2.	Gazipur	Barman, Garo, Koch	6.	Jessore, Satkhira, Khulna	Bagdi, Rajbangshi, Santal
3.	Patuakhali, Barguna, Cox Bazar district	Rakhain	7.	Rajshahi, Dinajpur, Rangpur, Gaibandha, Noagaon, Bagura, Sirajgonj, Chapainawabgonj, Natore district	Munda, Malo, Mahali, Khondo, Bedia, Bhumij, Kole, Bhil, Karmakar, Mahato, Muriyar, Musohor, Pahan, Paharia, Rai, Sing, Turi, Santal, Oraon
4.	Bandarban, Rangamati and Khagrachari district	Chakma, Marma, Tripura, Bawm, Pangkhu, Lusai, Tanchangya, Khiang, Mru, Asam, Gurkha, Chak, Khumi	8.		

### 6. Consultation with the ethnic community

Free, prior and informed consultations will be held with small ethnic and other vulnerable communities, CBOs, NGOs, and small ethnic community institutions (if any) where small ethnic community populations are found to be in the sub-project areas. These free, prior and informed consultations will take place during resource development planning process, and their broad community support will be documented. The EA/IA will pay particular attention to the need of disadvantaged or vulnerable groups, especially those below the poverty line, the landless, the elderly, female headed households, women and children, ethnic minority people, and those without legal title to land.

The following mechanisms will be followed:

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- Separate consultations with small ethnic and other vulnerable communities will be organized for every such group identified during the sub-project preparation stage
- Where small ethnic community's populations are in the minority, exclusive consultations with small ethnic community women and men, leaders, NGOS, and any relevant stakeholders to identify the priorities and strategies for ensuring small ethnic community inclusion in project institutions, interventions, and project benefits
- Fortnightly meetings in small ethnic communities for information sharing and consultation during the planning stages;
- Monthly meetings during the implementation stages of the project.
- Project will enhance awareness of the project's interventions among local small ethnic community populations through timely and routine publication and dissemination of information on the sub-project interventions in communication strategies that are locally acceptable and understandable

The EA/IA will provide relevant resettlement information, including information from the above mentioned documents in a timely manner, in an accessible place and in a form and language understandable to affected persons and other stakeholders. In case there is no impact and no RAP, the EA/IA will make disclosure of the same informing the main villages, habitations, market places that no land or structure, irrespective of their title will be affected by any activities of this project. The report of this disclosure giving detail of date, location will be shared with WB. The details on consultation process and disclosure at various phases of project development including the responsible agency are described in Table 4.

*Table 2: Consultation and Disclosure Roles and Responsibilities*

Project Phase	Activities	Details	Responsible Agency
Project Initiation Stage	<ul style="list-style-type: none"> <li>-Subproject information dissemination on various components.</li> <li>-Disclosure of preliminary plans for proposed land acquisition.</li> <li>-Preliminary Information sharing about the tentative alignment/sites with the DPs in case of temporary impact on business, income and livelihood.</li> </ul>	<ul style="list-style-type: none"> <li>-Leaflets posted or distributed containing information on the project.</li> <li>-Public notice issued in public places including newspapers and direct consultation with DPs /DPs.</li> </ul>	EA/IA

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Project Phase	Activities	Details	Responsible Agency
RAP Preparation Phase	Stakeholder consultations.	-Further consultations with DPs and households, titled and non-titled. -Summary RPF made available to all DPs at the convenient place which is easily accessible and should be in local language.	EA/IA
	Disclosure of final entitlements and rehabilitation packages and disclosure of draft RAP.	RAPs disclosed to all DPs in local language	EA/IA
	Finalization of RP.	-Review and approval of RAP by EA. -Review and clearance of RP by World Bank (prior to award of contract). Web disclosure of the RAP. Disclosure of the Final RP to DPs	EA/IA
RAP Implementation Stage	Ongoing consultation with DPs during RAP implementation.	-Continued discussions and information disclosure to DPs; -Payment of entitlements (all compensation must be paid before displacement occurs). -Grievance Redress Mechanism activated. -Written notification from EA/IA to WB that all compensation paid before displacement occurs. Construction can begin on sections where compensation is paid and community notified of start date of civil works. - DPs with unresolved grievances or disputes over land ownership, compensation amounts, etc. are notified of any compensation payments set aside by EA/IA in separate escrow accounts to be paid when disputes are resolved.	EA/IA/Implementing NGO

### 7. Project Impacts

A series of consultation meetings were conducted with MoC, Blue Ocean Foot-wear Ltd and Bengal Plastic Ltd where everybody expressed that project will not adversely affect any small ethnic communities. Rather, such people will be benefited from the project as project will create more job opportunities and ethnic minority people will receive the same opportunity. If project require any land, project will try to use government land or khas land. They will avoid any land occupied by the ethnic minority communities.

### 8. Baseline Conditions

Project planning processes will include preparation of a baseline on the socio-economic profile and resource dependence of the small ethnic groups in the project area, along with other relevant information on the small ethnic population in the project footprint area, such as their participation in community decision-making, participation within local institutions and customs, and language and cultural markers. Based on the consultations, key issues of the small ethnic community and other marginalized groups with respect to project interventions would be summarized, and will form part of the baseline. Every project plan will contain a separate section on the baseline small ethnic group situation, if present. This baseline will be used in the preparation of the SEVCDP and will include the following:

- List of communities with presence of small ethnic communities and their identification (name of small ethnic community, other marginalized social groups, if any);
- Community-wise listing of all small ethnic and other marginalized households
- Community-wise socio-economic profile of small ethnic and marginalized groups/households and other social groups (occupations, land holdings, debt status, etc.)
- Details of any traditional forest usage rights of small ethnic and marginalized groups in the area

Participatory assessment methods will be used during the planning stages, and the key issues of small ethnic groups and other vulnerable communities will be summarized in SECVDP Report.

### 9. Mitigation Measures

Though the project will not affect any tribal people, if any impact is seen over tribal people, the following mitigation measures will be taken by the project;

1. Resettlement and rehabilitation planning and preparation activities will be undertaken well before displacement occurs, with identified relocation areas and RAP is presented in advance to enable timely and appropriate decision making. A preference for relocation in nearby areas of their existing localities will be adopted.
2. Compensation based on land to land.
3. Livelihood restoration program for the vulnerable communities
4. Payment of full compensation prior displacement
5. Formation of local compensation committee that includes representative of small ethnic groups and other vulnerable groups working with them
6. Assistance in restoration of livelihood for example; training program, loan facilities, credit etc.

### 10. Grievance Redress Mechanism and Citizen Engagement

Wherever relevant and wherever traditional mechanisms are prevalent, grievance redress mechanisms (GRM) will be customized to the needs and practices of small ethnic and vulnerable community people. In addition, wherever small ethnic and vulnerable community people are in large numbers, there will be a small ethnic and vulnerable community representative in the grievance committees.

A two-tier bottom up GRC system will be established in this Project. First, there will be GRCs at the local level, hereafter called Local GRC (union/municipality level); and second, GRC at the project level to give room for grievances to be fairly reviewed. These GRCs will be established through gazette notifications from the Ministry. The APs will be informed through public consultation that they have a right to have their grievances redressed by the local committees as well as by the project management.

The EA/IA will ensure that small ethnic communities those are directly affected by the project will have the chance to express their legitimate grievance or to file a complaint about the project by setting up a mechanism to address the issues raised. To ensure the citizens' engagement, at least one of the member of the GRC will be from minority community and it will ensure the transparency of this mechanism.

Generally, grievances are compensation-related. To provide a more structured local level GRM, project-level grievance redress mechanism, a grievance redress committee (GRC) will be formed as soon as the funding of the project becomes effective and will continue until project completion. The members of GRC will ensure representation of women and will slightly vary between the components of the project. The PIU Manager will act as the convener and members of the GRC will be representative from the factory, chair of the union where the project is located, a witness for the AP (preferably from tribal community), and a representative from a local group (i.e. religious, teacher, etc.). There will be two entry points in filing a complaint(s) as follows:

**First level** – affected persons (APs) will be informed in writing to the chair of the enterprise of leather/plastic or foot-wear industry of their losses and entitlements. If APs agree with the conditions of entitlements, they can claim for the payments from the EA. GRCs at the union/municipality level (community level) will be formed with representatives from factory/industry, local elected representatives from the Local Government Institutions (LGI), representatives of the affected persons (preferably women representative in case of women APs but have to be from the ethnic community), and RAP implementing NGO. There will be one GRC at local (union/municipality) level by the project to make it accessible to affected people both in terms of distance and time.

**Second level** – if an aggrieved AP disagree with the resolution at the first level, he/she will be able to approach the PIU for clarifications. The PIU will respond to queries within two weeks. Grievances raised will be documented providing details on the person, concern(s) raised, and the action taken by the PIU. If the AP(s) is satisfied, the compensation can be claimed from the PIU. The Project-Level GRC will review all unresolved cases forwarded to by Local GRCs. It will be headed by the Project Director (PD). The Project-level GRC with representation of senior elected Upazila official and civil society member will further establish fairness and transparency in the resolution of disputes or grievances. In specific cases, Project-level GRC may seek legal advice from the INGO Legal Advisor or any external legal advisor, if required.

The GRC will meet once a month to deliberate on the complaint(s), if any and will keep a record of the grievances. The record will include the contact details of the complainant, date the complaint was received and the nature of the complaint, agreement on corrective actions and the date it was enforced,

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and the final outcome. Complaints received, with appropriate documentation, will become part of the environmental and social monitoring reports submitted to WB.

If the project component does not involve compensation on entitlements, the current GRS will deal with project-specific environmental and social concerns/issues. The PIU will ensure that the grievance redress mechanism maintains a transparent process that is gender and special needs-responsive, culturally-appropriate and easily accessible to all project affected people at no costs and without retribution. The proposed mechanism does not impede access to the country's judicial or administrative remedies.

### 11 Implementation Arrangement and Entitlement Matrix

Same entitlement matrix mentioned in RPF of this project will be followed for the small ethnic and vulnerable communities. If any person belonging to small ethnic communities is affected by the project, he/she will be recognized as vulnerable and additional grant will be compensated. Implementation Arrangement and Institutional arrangement will be the same as well mentioned in RPF. **Please see RPF for details.**

### 12 Capacity Building

- The project will provide an action plan to address the capacity enhancement needs of vulnerable groups including small ethnic communities and ensure that they will be able to benefit from the employment and skills development opportunities provided by the project.
- The Project will be involved in mobilizing the small ethnic community people for strengthening through training. Likewise, capable members of local ethnic groups, including women will be engaged by the concerned agencies of PIU to undertake information dissemination works, preparing the beneficiary groups for project activities and contributory works.
- Development of beneficiary groups during the subcomponent implementation will include social mobilization and information campaign, and skills upgrading.
- Representation of the vulnerable groups and their active involvement in project activities during and post implementation phases will increase their access to the services to be provided by the project.
- Mitigation measures will prioritize while addressing the susceptibility of diverse vulnerable groups including ethnic groups.
- The PIU will be actively involved in disseminating information on to the target groups beneficiaries about the key project components, subcomponents, activities, eligibility and selection criteria, stakeholder involvement, contribution of the project and project implementation process.

### 13 Monitoring and Reporting

PIU will be responsible for monitoring and evaluation of activities related to SEVCDP. PIU, with the help of the IA, will collect ethnicity-disaggregated data. IA will regularly analyze Project output and impact indicators, including by ethnicity. A Gender and ethnic minority specialist may be appointed who would build the capacity of the EA and relevant IA personnel to collect ethnicity-disaggregated Project data and ensure that monitoring and evaluation procedures include indicators for monitoring impact on the Project's beneficiaries. PIU will provide World Bank any related information for their review of performance and compliance with the World Bank policies.

## 14 Specific Measures

Specific measures for vulnerable groups including minor ethnic communities, women, and powerless communities are outlined in following table. Source of funding and the agencies responsible to implement the proposed strategies are included in the table below.

*Table 03: Specific measures for SEVCDP*

<b>Proposed Strategies</b>	<b>Source of funding</b>	<b>Responsible</b>
<b>A. Inclusion</b>		
<ul style="list-style-type: none"> <li>• Ensure of participant’s awareness campaign, project implementation and monitoring</li> <li>• Ensure equal wages for similar work during implementation</li> <li>• Launch project information campaign to inform the target groups about the key features of the project and sub component</li> </ul>	The project	EA/IA
<b>B. Project Planning</b>		
<ul style="list-style-type: none"> <li>• Access and analyze the presence of small ethnic people and other vulnerable communities in project sites</li> <li>• Treat and support small ethnic and vulnerable people preferentially.</li> <li>• Involve small ethnic people during the project planning stage</li> </ul>	The project	PIU/EA/IA
<b>C. Capacity Building</b>		
<ul style="list-style-type: none"> <li>• Conduct project related meetings in small ethnic and vulnerable community areas to encourage their participation. Ensure a quorum which includes representation from small ethnic groups</li> <li>• Provide targeted assistance/training aimed at vulnerable groups to enhance livelihoods and participation in the subcomponents</li> <li>• Built in awareness campaign about the project in the project</li> <li>• Build capacity of small ethnic peoples and other vulnerable communities promoting necessary knowledge and skills to participate in industry level job sectors.</li> </ul>	The Project	PIU/EA/IA

### 15. Public Disclosure

If small ethnic people are affected by the project, the project will prepare a Tribal People Plan and Project will disclose the plan to the public in Bangladesh by posting it in its website, and authorize the World Bank to disclose it at its Country Office Information Center and in its Infoshop. The Project will also ensure that copies of the translated document are made available at its headquarters and site offices established during the implementation period. As to disclosure, the Project will inform the public through notification in two national newspapers (Bangla and English) about the EC4J project and where it could be accessed for review and comments

## Small and Ethnic and Vulnerable Communities' Development Framework

### Annex-1: Social Safeguard Screening for the Ethnic Communities

[To be filled in for each community jointly by Project Proponent(s) and consultants. Where private lands are to be acquired or public lands are to be resumed from authorized and unauthorized private users, census of affected persons and inventory of losses to be carried out.]

#### A. Identification

1. Name of Area: ..... Ward No/Union name :  
.....  
District/Upozila/City Name:  
.....
2. Project component: .....
3. Brief description of the physical works: .....  
.....  
.....
4. Screening Date(s): .....

#### B. Participation in Screening

5. Names of consultants' representatives who screened the subproject :
6. Names of project officials participated in screening:
7. Local Government representatives and community members & organizations participated in screening:  
List them in separate pages with names and addresses, in terms of community selection and any other information to identify them during preparation of impact mitigation plans.
8. Would-be affected/benefited persons participated in screening: List them in separate pages with names, addresses in terms of community selection where they would be affected, and any other information to identify them during preparation of impact mitigation plans.

#### C. Land Requirements & Ownership

9. Will there be a need for additional lands\* to carry out the intended works under this contract?  
 Yes  No (\* 'Additional lands' mean lands beyond the existing available land)
10. If 'Yes', the required lands presently belong to (Indicate all that apply):  
 Private citizens  Government – khas & other GoB agencies  
 Others (Mention): .....

#### D. Current Land Use & Potential Impacts

11. If the required lands belong to Private Citizens, they are currently used for (Indicate all that apply):
- |  |  |                  |
|--|--|------------------|
| <input type="checkbox"/> Agriculture                 | # of households using the lands: ..... |                  |
| <input type="checkbox"/> Residential purposes        | # of households living on them: .....  |                  |
| <input type="checkbox"/> Commercial purposes         | # of persons using them: .....         | #of shops: ..... |
| <input type="checkbox"/> Other Uses (Mention): ..... |  | # of users: ...  |
12. If the required lands belong to Government agencies, they are currently used for (Indicate all that apply):

## Small and Ethnic and Vulnerable Communities' Development Framework

- Agriculture # of persons/households using the lands: .....  
 Residential purposes # of households living on them: .....  
 Commercial purposes # of persons using them: ..... # of shops: .....  
 Other Uses (Mention): ..... # of users: .....

13. *How many of the present users have lease agreements with the concerned government agencies?*  
 .....

14. *Number of private homesteads that would be affected on private lands:*

*Entirely, requiring relocation: ..... Partially, but can still live on present homestead: .....*

15. *Number of business premises/buildings that would be affected on private lands:* .....

*Entirely and will require relocation: ..... # of businesses housed in them: .....*

*Partially, but can still use the premises: ..... # of businesses housed in them: .....*

16. *Residential households will be affected on public lands:* .....

*Entirely affected and will require relocation: # of these structures: .....*

*# of structures built with brick, RCC, & other expensive and durable materials: .....*

*# of structures built with inexpensive salvageable materials (bamboo, GI sheets, etc.): ....*

*Partially affected, but can still live on the present homestead: # of structures: .....*

*# of structures built with brick, RCC, & other expensive and durable materials: .....*

*# of structures built with inexpensive salvageable materials (bamboo, GI sheets, etc.): ....*

17. *# of business premises that would be affected on public lands:*

*Entirely affected and will require relocation:*

*# of these structures: .....*

*# of businesses housed in these structures: .....*

*# of persons presently employed in the above businesses: .....*

*# of these structures built with brick, RCC, & other durable materials: .....*

*# of structure built with inexpensive salvageable materials (bamboo, GI sheets, etc.): .....*

*Partially affected, but can still stay in the present premises:*

*# of these structures: .....*

*# of businesses housed in these structures: .....*

*# of persons presently employed in these businesses: .....*

*# of these structures built with brick, RCC, & other durable materials: .....*

*# of structure built with inexpensive salvageable materials (bamboo, GI sheets, etc.): .....*

18. *# of businesses/trading activities that would be displaced from make-shift structures on the project area:* .....

19. *Do the proposed project works affect any community groups' access to any resources that are used for livelihood purposes?*

Yes

No

20. *If 'Yes', description of the resources:*

.....  
 .....

**Small and Ethnic and Vulnerable Communities' Development Framework**

.....  
.....  
.....  
.....

21. Do the proposed works affect community facilities like school, cemetery, mosque, temple, or others that are of religious, cultural and historical significance?

Yes  No

22. If 'Yes', description of the facilities: .....

.....  
.....  
.....  
.....

23. Describe any other impacts that have not been covered in this questionnaire?

.....  
.....  
.....

24. Describe alternatives, if any, to avoid or minimize use of additional lands:

.....  
.....  
.....

**E. ADDITIONAL INFORMATION ON SMALL ETHNIC COMMUNITY PEOPLE**

(This section must be filled in if sites are located in areas that are also inhabited by small ethnic community peoples.)

25. Is the subproject site located in an area inhabited by small ethnic community people?

Yes  No

If the answer is no, skip this section of the form.

26. If the answer is Yes, is there any SEC Impacted by the land acquisition or any other interventions of the project?

Yes  No

27. If the answer is Yes to question no. 26, is there SECs also likely to be benefited from the subproject?

Yes  No

28. If the answer is Yes to question no. 26, is there any SECs likely to be affected by the subproject?

Yes  No

If the answers to questions 26, 27 and/or 28 are no, skip the following sections of the form.

29. Have the SEC and the potential affected SECs been made aware of the potential positive and

## Small and Ethnic and Vulnerable Communities' Development Framework

*negative impacts and consulted for their feedback and inputs?*

Yes  No

Has there been a broad-based community consensus on the proposed works?

Yes  No

30. Total number of would-be affected SEC households: .....

31. The potential affected TP households have the following forms of rights to the required lands:

Legal: # of households: .....

Customary: # of households: .....

Lease agreements with any GoB agencies: # of households: .....

Others (Mention): ..... # of households: .....

32. Does the project affect any objects that are of religious and cultural significance to the SECs?

Yes  No

33. If 'Yes', description of the objects:

.....  
 .....

34. The following are the three main economic activities of the potential affected SEC households:

a. ....

b. ....

c. ....

35. Social concerns expressed by SE communities/organizations about the works proposed under the subproject: .....

.....  
 .....

36. The SE community and organizations perceive the social outcomes of the subproject:

Positive  Negative  Neither positive nor negative

37. Names of SE community members and organizations who participated in screening:

.....

38. Apart from SEC, Are the PAP otherwise vulnerable?

a. Female headed HH Affected persons F M

b. Other Female PAP Affected persons F M

c. Disabled PAP Affected persons F M

d. Hijra PAP

=====

39. Probable rehabilitation/ development assistance

What	Quantity	Likely Cost
------	----------	-------------

**On behalf of the project consultant, this Screening Form has been filled in by:**

Name: ..... Designation: .....

Signature: ..... Date: .....