



# Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 03-Oct-2018 | Report No: PIDISDSA24947



**BASIC INFORMATION**

**A. Basic Project Data**

Country Bangladesh	Project ID P167762	Project Name Emergency Multi-Sector Rohingya Crisis Response Project	Parent Project ID (if any)
Region SOUTH ASIA	Estimated Appraisal Date 28-Sep-2018	Estimated Board Date 30-Nov-2018	Practice Area (Lead) Social, Urban, Rural and Resilience Global Practice
Financing Instrument Investment Project Financing	Borrower(s) Government of Bangladesh	Implementing Agency Department of Public Health Engineering, Ministry of Disaster Management and Relief, Local Government Engineering Department	

Proposed Development Objective(s)

To strengthen the Government of Bangladesh systems to improve access to basic services and build disaster and social resilience of the displaced Rohingya population.

Components

- Component 1: Strengthening Delivery of Basic Services, Resilient Infrastructure and Emergency Response
- Component 2: Strengthening of Community Resilience
- Component 3: Strengthening Institutional Systems to Enhance Service Provision to the Displaced Rohingya Population
- Component 4: Contingent Emergency Response Component (CERC)

The processing of this project is applying the policy requirements exceptions for situations of urgent need of assistance or capacity constraints that are outlined in OP 10.00, paragraph 12.

Yes

**PROJECT FINANCING DATA (US\$, Millions)**

**SUMMARY**

<b>Total Project Cost</b>	165.00
<b>Total Financing</b>	165.00
<b>of which IBRD/IDA</b>	165.00



Financing Gap	0.00
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**DETAILS**

**World Bank Group Financing**

International Development Association (IDA)	165.00
IDA Credit	27.50
IDA Grant	137.50

Environmental Assessment Category

A-Full Assessment

Decision

The review did authorize the team to appraise and negotiate

**B. Introduction and Context**

Country Context

1. **Bangladesh is one of the world’s most populous countries with an estimated 165 million people in a geographical area of about 147,570 sq. km and per capita income of US\$1,480 in 2017.** During recent years, economic conditions improved in the country. The GDP grew well above the average for developing countries in recent years, averaging 6.5 percent since 2010, with an officially estimated growth of 7.86 percent in FY2018, driven by manufacturing and construction. Bangladesh has progressed in reducing extreme poverty and boosting shared prosperity, with poverty incidence (based on international US\$1.90 per capita/day poverty line, and measured using the Purchasing Power Parity exchange rate) declining from 44.2 percent in 1991 to 13.5 percent in 2016. Bangladesh’s performance on the Millennium Development Goals (MDG) goals was impressive against the South Asia Region average for most of the indicators. The country has witnessed a profound social transformation with an influx of girls into the education system and women into the labor force. The Government of Bangladesh (GoB) has also emphasized on ‘accelerating growth’ and ‘empowering citizens’ through more job creation, inequality reduction, access to education and employment, transportation and power sector improvement, social protection coverage and building resilience against natural disasters.

2. **Bangladesh’s physical and cultural characteristics and the livelihoods of nearly 165 million people are defined by the Ganges-Brahmaputra-Meghna delta—the world’s largest, most densely populated delta, and one of the richest in aquatic resources.** The societal vulnerability to extreme weather events is clearly illustrated in the case of Bangladesh. Bangladesh is considered one of the most disaster-prone and climate vulnerable countries in the world. Bangladesh faces considerable development challenges posed by its low and flat topography and vulnerability to floods, torrential rains, erosion, and storms and tidal surges due to severe cyclones and landslides. Its vulnerability is exacerbated by climate change induced increase in frequency and intensity of extreme weather events, sea level rise and



uncertainty. Bangladesh is ranked the 6th most climate vulnerable country among 181 countries. Damages and losses associated with a single extreme event impose substantial costs on the national economy and repeated exposure to hydro-meteorological hazards such as cyclones and floods often pushes the poor, particularly rural poor, into chronic poverty.

#### Sectoral and Institutional Context

3. **Since August 2017, more than 725,000 people have crossed into Bangladesh from Myanmar, most taking shelter in congested camps, with some living amongst host communities.** They join around 300,000 people displaced from Myanmar in previous years. This population has enormous needs for humanitarian services, placing an immense strain on an already resource-constrained service delivery system. Given uncertainties and expected delays in repatriation, the Government of Bangladesh will continue to deliver humanitarian aid directly and through United Nations (UN) agencies and local/international Non-Governmental Organizations (NGOs).

4. **While progress has been made in delivering essential services, there remain significant gaps and unmet needs in various sectors.** In Cox's Bazar, many of these sectors lagged behind the national average even before the crisis and the drastic DRP influx has further exacerbated the situation. As such, government agencies and resources are overstretched under crisis response efforts and thus most services are now provided by the humanitarian sector.

5. **Health:** Ministry of Health and Family Welfare (MOHFW) and partners (bilaterals, UN agencies and NGOs) have scaled up health, nutrition and immunization services for the DRP. However, challenges persist. Prior to entering Bangladesh, the DRP had poor access to health and nutrition services. Immunization coverage was around 10 percent with high rates of child malnutrition. Overcrowding in the camps places women at risk for additional forms of GBV, such as trafficking. A high prevalence of sexually transmitted diseases including HIV/AIDS has been found in the DRP in addition to respiratory infections and malaria that pose serious risks. There is a need to improve primary and outpatient health services, maternal and infant mortalities, and nutrition services through additional health and nutrition centers<sup>1</sup>, referral (secondary) facilities<sup>2</sup> and scale up behavior change communication (BCC) and counselling.

6. **WASH:** Access to improved water quality and quantity is a priority. However, thousands of poorly positioned and low-quality water installations that were constructed during the initial phase of the influx present a major health risk. Of 5,731 existing tube-wells, some 21% are estimated to need immediate rehabilitation or replacement<sup>3</sup>. Salinity is a further risk to water quality; as are the threats of water-borne diseases which are exacerbated by poor personal hygiene and low awareness of good WASH practices. Fecal sludge management in the DRP camps is insufficient, and latrines with shallow pits are located close to water points, so water from shallow tube-wells are easily contaminated<sup>4</sup>. There is a need to move away from the current temporary water and sanitation facilities to improved WASH services and with stronger focus on service delivery and behavior change communication.

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<sup>1</sup> around 1 per 20,000 population.

<sup>2</sup> around 1 per 200,000 population.

<sup>3</sup> WASH Sector 2018 Strategy

<sup>4</sup> WASH Sector 2018 Strategy



7. **Environment:** The settlement of DRPs in Cox's Bazar's South Forest Division, including the Teknaf and Ukhiya Ranges, the Teknaf Wildlife Sanctuary, and other Reserved Forest areas has added unprecedented pressure on the area's natural resources: 730 tons of trees per day are being cut for fuel<sup>5</sup>. The financial loss from tree destruction is about US\$55 million. The loss from ecosystem services, biodiversity and environmental degradation is much higher and has not yet been measured.

8. **Education:** Through the efforts of the Inter Sector Coordination Group (ISCG) and the GoB, 110,042 primary and 24,645 pre-primary school aged children, mostly DRPs, have been enrolled in learning centers in the affected area. However, around 625,000<sup>6</sup> DRPs still need education-centric responses. Around 55 percent<sup>7</sup> (370,000) of the DRPs are under 18 years. The existing learning centers in the makeshift settlements are unable to cope with increased numbers and there are no education facilities in the spontaneous settlements. Additionally, many households within the camps are headed by orphaned children.

9. **Social Protection:** At least 80 percent of the DRPs are dependent on life-saving external assistance. The remaining 20 percent only partially meet their needs through coping strategies, which will quickly deteriorate as coping capacities such as savings are exhausted. The high influx of DRPs has placed formidable pressures on an already inadequately resourced social service delivery system. There are also concerns about recruitment of DRPs into armed groups, threatening stability both in Bangladesh and over the border into Myanmar.

10. **Disaster Risk Management:** Bangladesh is one of the most vulnerable countries in the world to natural calamities like cyclones and floods – 60 percent of the worldwide deaths caused by cyclones in the last 20 years occurred in Bangladesh<sup>8</sup>. Climate change may increase the frequency, peak intensity of cyclones and precipitation rates. Also, cyclone-induced storm surges are likely to be exacerbated by a potential rise in sea level. Bangladesh sits on the flood plains of several major rivers which drain from the mountainous regions of the Himalayas, making seasonal flooding another hazard often coinciding with the cyclone season. Floods and riverbank erosions affect some one million people annually in Bangladesh. Once every three to five years, up to two-thirds of Bangladesh is inundated by floods. In the Kutupalong/Balukhali extensions site, a high percentage of the land is unsuitable for human settlement as risks of flooding and landslides are high and are further aggravated by the congestion and extensive terracing of the hills. The population density is 8m<sup>2</sup> per person, compared to the accepted international standard of 45m<sup>2</sup>. In March, over 500 additional acres of land were allocated by the Government and are being prepared for relocation of people at risk. As of May 7, 2018, only 4 percent of at-risk people had been relocated to safer sites. Along with shelter improvements, other mitigation works such as dredging, improvement of roads and bridges, and culvert construction, as well as training of Cyclone Preparedness Program volunteers (about 2 per camp) are ongoing. Despite these efforts, the monsoon is expected to severely impact relief activities and potentially interrupt access and services, and the effects of a cyclone could be devastating given the amount of people, difficult access, and insufficient places for safe shelter.

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<sup>5</sup> IOM & FAO (2017). Assessment of Fuel Wood Supply and Demand In Displacement Settings and Surrounding Areas in Cox's Bazaar District, Dhaka, Bangladesh.

<sup>6</sup> Joint Response Plan for Rohingya Humanitarian Crisis, March - December 2018

<sup>7</sup> NPM Round 7.

<sup>8</sup> World Bank Climate Change Knowledge Portal (<http://sdwebx.worldbank.org/climateportal/>)



11. **Gender:** DRP women face high levels of discrimination within their community, and most women stay in their shelters due to social norms that limit their roles in the public sphere as well as to avoid sexual assault and trafficking that is occurring in the camps. This restricted mobility is particularly challenging for women-headed households who compose 16 percent of DRP households. The extent of Gender-Based Violence (GBV) faced by DRP women is difficult to quantify, but UN agencies and local NGOs report high levels. Approximately 85 percent of sites within Bangladeshi communities hosting DRP have no services for survivors of violence<sup>9</sup>. Immediate health services for survivors of violence, and outreach, peer counseling, and behavior change training will have an impact on GBV prevention. While women unquestionably should be prioritized in a gendered approach given their lower socio-economic status and education levels in the Rohingya community, higher risk of violence and trafficking, etc., a number of men are suffering from trauma, which can play out in anti-social behavior, including intimate partner violence. The tendency for engaging in anti-social behavior for adolescent boys is also high among the DRPs.

12. **Local Governance:** The DRP are currently located in 16 Unions of Ukhia and Teknaf upazilas in the Cox’s Bazar District. Union Parishads (UPs) are the lowest tier in the local government system in rural areas. UPs are critical in provisioning of services under their jurisdiction, identifying and meeting rapidly evolving needs, and strengthening the social contract between host communities and the DRP. They are also critical in ensuring local ownership of recovery and resilience building processes for communities and institutions at all levels. Significant challenges however impede the core functions of host UPs and their Upazilas as frontline agents of the crisis. Most of their land and services has been taken up to accommodate the refugee camps and the crisis has weakened their human, financial, and institutional capacities to carry out their core functions.

Sector	Impact Highlights
<b>Health</b>	<ul style="list-style-type: none"> <li data-bbox="396 1178 954 1234">• Health and nutrition indicators in Cox’s Bazar lag national averages.</li> <li data-bbox="396 1241 954 1367">• From Nov 2017 - August 2018<sup>10</sup>, among DRP, there were 8,031 cases of diphtheria with 44 deaths. In host communities, there were 56 cases, with no deaths.</li> <li data-bbox="396 1373 954 1585">• In case of flooding, the number of people suffering acute watery diarrhea is likely to increase. UNICEF and partners are readying to support an estimated 10,000 people, more than half of which (55 per cent) are children, with treatment for Acute Watery Diarrhea from May to July 2018 <sup>11</sup>.</li> </ul> <ul style="list-style-type: none"> <li data-bbox="980 1178 1539 1331">• The MOHFW service delivery system in Cox’s Bazar is inadequate for the influx, composed of 1 District Hospital, 7 Upazila Health Complexes, 72 Union-level facilities, and 180 Community Clinics<sup>12</sup>.</li> </ul>

<sup>9</sup> ISCG Situation report: Rohingya Refugee Crisis Cox’s Bazar | May 24, 2018.

<sup>10</sup> WHO, January 2018

<sup>11</sup> UNICEF, July 2018

<sup>12</sup> Health Bulletin 2016, Cox’s Bazar Civil Surgeon Office, MOHFW; District Health Information System 2 (DHIS2), MOHFW



<b>WASH</b>	<ul style="list-style-type: none"> <li>• Prior to the influx, 76 percent<sup>13</sup> of Rohingya population had no access to safe water.</li> </ul>	<ul style="list-style-type: none"> <li>• Access to water from tube-wells went down from 1:5 households prior to the crisis to 1:100<sup>14</sup>.</li> </ul>
<b>Environment</b>	<ul style="list-style-type: none"> <li>• The population of Cox’s Bazaar is 2.29 million (2011 census), growing at 2.55 percent annually<sup>15</sup>. The influx of about 1.0 million DRP has added unprecedented pressure on the area’s natural resources.</li> </ul>	<ul style="list-style-type: none"> <li>• The crisis has led to slope instability, exposure to flooding, high temperature due to lack of vegetation cover, indoor air pollution, increase surface water pollution, ecosystem destruction and other environmental impacts.</li> </ul>
<b>Education</b>	<ul style="list-style-type: none"> <li>• 625,000 DRP will need education-centric response<sup>16</sup>.</li> <li>• Rakhine state has the lowest enrollment rates (early: 5.4 percent, primary: 71-76 percent, secondary: 31-32 percent) in Myanmar.</li> </ul>	<ul style="list-style-type: none"> <li>• 73 percent of children and youth aged between 3 and 24 years in Cox’s Bazar, from both of DRPs and host have no literacy skills<sup>17</sup>.</li> <li>• Cox’s Bazar’s primary enrolment rate is the lowest in the country (72.6 percent boys, 69.1 percent girls) compared to national average 98 percent<sup>18</sup>.</li> </ul>
<b>Social Protection</b>	<ul style="list-style-type: none"> <li>• At least 80 percent of the overall displaced Rohingya population is highly or entirely dependent on life-saving external assistance.</li> </ul>	<ul style="list-style-type: none"> <li>• The remaining 20 percent can only partially meet their needs through coping strategies including savings, sale of jewelry and purchase of food on credit.</li> </ul>
<b>Disaster Risk Management</b>	<ul style="list-style-type: none"> <li>• Around 246,000<sup>19</sup> DRP were vulnerable to landslides and floods given their location, hazard profile of the area, congestion, and severe environmental degradation before the starting of relocation activity.</li> </ul>	<ul style="list-style-type: none"> <li>• Around 24,401 DRP have relocated and around 24,040 have been prioritized to shift from the highly landslide risk areas as of August 12, 2018<sup>20</sup>.</li> </ul>
<b>Gender</b>	<ul style="list-style-type: none"> <li>• 52 percent<sup>21</sup> of the DRP are women. Over 70 percent of DRP women have been subjected to gender-based violence (GBV) even before they fled to Bangladesh.</li> </ul>	<ul style="list-style-type: none"> <li>• 77 percent of women and girls residing in the settlement sites hosting DRP across Cox’s Bazar District reported feeling unsafe.</li> </ul>

**Institutional Context**

<sup>13</sup> Humanitarian Response Plan, October 2018

<sup>14</sup>ASCAPS Thematic Report. Rohingya Crisis. Host communities review, January 2018

<sup>15</sup> Bangladesh Bureau of Statistics, Population and Housing Census 2011

<sup>16</sup> Joint Response Plan for Rohingya Humanitarian Crisis, March - December 2018

<sup>17</sup> On March 1st, 2018, UNICEF shared a Global Partnership for Education Funding Proposal (Leaving No One Behind: Education for girls and boys of Rohingya displaced Rohingya populations and host communities in Cox’s Bazar) with the World Bank.

<sup>18</sup>Ministry of Primary and Mass Education, Annual Primary School Census 2017

<sup>19</sup> Monsoon Emergency Response Update, ISCG, Rohingya Refugee Crisis, Cox’s Bazar, Bangladesh (8-14 August 2018)

<sup>20</sup> Ibid

<sup>21</sup> Population Factsheet, UNHCR, Bangladesh, Cox's Bazar - as of 31 August 2018



### Government Response

13. **The GoB has demonstrated its generosity by maintaining an open border policy for the DRP.** In spite of its own development challenges, and in the aftermath of devastating floods, the Government has maintained a commendable stance to let the DRP find safety in the country. To date, the GoB has supported basic humanitarian assistance for the DRP, including provision of land for shelters, building access roads, immunization campaigns and other health services, water points and sanitation facilities. Although the overarching goal of the GoB is to facilitate safe, voluntary and dignified return of the DRP, which has been agreed on in a bilateral discussion with the Government of Myanmar, the GoB has expressed its commitment to continue delivering services for the DRP hosted in Bangladesh.

14. **The GoB has responded rapidly and effectively to the unfolding crisis and continues to deliver much needed basic assistance.** The Ministry of Disaster Management and Relief (MoDMR), represented by the Refugee Relief and Repatriation Commissioner (RRRC) at the local level, is charged with operational coordination of the response. The Deputy Commissioner's Office and his entire team were key initial responders as well. Two thousand acres of Forestry land were quickly allocated to shelter the DRP. The Military were engaged in September 2017 and continue to provide on the ground support to the construction of roads and WASH facilities and distribution of substantial relief items received from civil society and the private sector through the District Authorities. On a more strategic level, the Ministry of Foreign Affairs and the National Task Force, which involves 29 Ministries and is chaired by the Foreign Secretary, leads the overall strategy and policy coordination.

15. **The GoB has demonstrated its leadership by coordinating with various humanitarian agencies.** Such efforts yielded multi-sectoral needs assessment and strategic planning, leading to the development of a Joint Response Plan (JRP). The JRP identifies key needs to be urgently addressed to mitigate any further shocks to the crisis. Current humanitarian efforts fall short of the total financing needs highlighted in the JRP. There is a broad consensus, however, that a focus on short-term immediate response is insufficient and that the emphasis on strengthening the GoB's service delivery capacity on the ground is crucial. The GoB is concerned that its limited resources are not adequate to bear the full responsibility of the crisis response effort. It has called on its partners, including development institutions such as the World Bank Group, for help. The GoB is keen on ensuring such assistance can be sustained for as long as may be necessary.

16. **In May 2018, the GoB shared a preliminary plan outlining a series of actions to respond to the crisis.** Building on the 2014 strategy<sup>22</sup> on addressing the issue of Myanmar Refugees and Undocumented Myanmar Nationals, the GoB proposed a plan to respond to the current crisis and to further support the DRP by providing basic services including: health, nutrition and population services; water, sanitation and hygiene (WASH); social protection; environment management; improved access roads; disaster risk management; and support for learning centers and life skills. The GoB is willing to adapt its action plan,

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<sup>22</sup> In 2014, the Government of Bangladesh developed the "Government Strategy Paper addressing the issue of Myanmar Refugees and Undocumented Myanmar Nationals in Bangladesh", which focuses on: (i) listing of undocumented Myanmar Nationals in Bangladesh; (ii) meeting the basic needs of the individuals; (iii) strengthening Bangladesh-Myanmar border management; (iv) sustaining diplomatic relations with the Government of Myanmar at bilateral and multilateral levels; and (v) ensuring national level coordination.





as and when required, to respond to the situation as it evolves. The Bank has been engaged in a strategic policy dialogue with the authorities to address medium-term socioeconomic dimensions of the crisis.

17. **The GoB's overall framework for the protection of refugees is adequate based on practices consistent with international refugee protection standards.** Bangladesh's ratification of a number of human right instruments, as well as its 2014 strategy covering humanitarian and repatriation issues, and the recent Memorandum of Understanding (MoU) with UNHCR on voluntary repatriation, have provided the basis for the government's treatment of DRPs since the start of the current crisis. The MoU includes commitments to ensure and document the DRPs free and informed choice to return, to preserve family unity, to take adequate measures for individuals with specific needs, and to register and document the birth of DRP children. The commitment also includes safety and security of the DRP.

18. **The GoB plans to divide the DRP camps into administrative zones with proposals to establish 25-30 temporary administrative units within each zone.** This would require a concerted effort to hire and train staff in these units to manage and govern zones within camps. Hiring from within the DRP community would limit language barriers and ensure needs are better communicated to local authorities. Efforts to build capacity and collaboration between host and DRP communities will be critical to ensure smooth governance, limit conflict and build trust. Of immediate concern is the need to support mechanisms that enable DRP to voice their needs and to monitor responses to those needs by local governments and refugee camp administrative offices. These mechanisms should include channels for grievance redress and conflict resolution, as well as channels for addressing perceptions of inequitable access to support and services during the recovery process. This is particularly crucial in areas where competition between DRP and host communities over services and opportunities for productive activities is causing friction, and where tensions along sectarian lines persist.

### World Bank Response

19. **Building on humanitarian assistance, the Bank adjusted ongoing operations to respond to prioritized medium-term needs of DRP.** Two operations were expanded with additional financing to cover the DRP: US\$50 million in additional financing to the ongoing US\$500 million Health Sector Support Project (P167672) (HSSP), approved by the World Bank Board on June 28, 2018; and US\$25 million in additional financing to the US\$130 million Reaching Out of School Children (P167870) (ROSC), approved by the Board on September 19, 2018. The following ongoing operations are supporting the host community in Cox's Bazar: US\$375 million Multi-Purpose Disaster Shelter Project (MDSP) is supporting disaster preparedness, US\$410 million Municipal Governance and Services Project (MGSP) is improving municipal governance and basic urban services in participating Urban Local Bodies (ULBs), US\$300 million Local Governance Support Project (LGSP) is institutionalizing the Union Parishad (UP) fiscal transfer system, and introducing a fiscal transfer system for Pourashavas on a pilot basis, and a new proposed IDA US\$175 million Sustainable Forests and Livelihood Project (SUFAL) will also support host communities to improve collaborative forest management and increase benefits for forest dependent communities in targeted sites. The proposed stand-alone Emergency Multi-Sector Rohingya Crisis Response Project will complement the above projects and will target DRPs.

### C. Proposed Development Objective(s)



Development Objective(s) (From PAD)

To strengthen the Government of Bangladesh systems to improve access to basic services and build disaster and social resilience of the displaced Rohingya population.

Key Results

**PDO Level Indicators**

- Number of people with access to improved public infrastructure as a result of the project (disaggregated by gender).
- Number of people with access to climate resilient multi-purpose disaster shelters as a result of the project (disaggregated by gender).
- Households participating in community workfare and services [an indicator for social resilience].
- Operational Grievance Redress Mechanism housed in the Refugee Relief and Repatriation Commissioner office.

**B. Project Components**

**Component 1: Strengthening Delivery of Basic Services, Resilient Infrastructure and Emergency Response (US\$115 million)**

*Subcomponent 1.A: Water, Sanitation and Hygiene*

20. The objective of this subcomponent is to support improved and resilient access to safe water and sanitation (with climate resilient features to reduce the risk to climate vulnerability and disasters) as well as hygiene promotion.

21. This subcomponent will establish improved water supply service with a combination of community stand points, rain water harvesting, and piped water supply systems. The water supply scheme will comprise of: (i) resilient mini piped water supply schemes (including rehabilitation of existing tube wells connected with solar powered PV pumping systems with elevated platforms above flood level); (ii) rehabilitation of existing tube wells with elevated platform (above flood level); (iii) mobile desalination plants in Teknaf; (iv) water resource mapping and water quality monitoring including water resource availability considering climate vulnerability and extreme weather conditions; and (v) a feasibility study for climate-resilient surface water treatment options in Teknaf and surrounding areas. These interventions are expected to improve the quality, resilience, and sustainability of water services as well as help reduce water losses for DRP.

22. This subcomponent will also aim to improve access to resilient sanitation. It will finance safe and acceptable sanitation services focusing on the entire sanitation service chain i.e. containment, collection, transport, treatment and safe disposal of fecal matter through (i) construction of improved individual and chamber community latrines (including protection measures for gender segregation; bath and cloth washing facilities, with water source, septic tanks and solar support) with resilient superstructure and raised platform (above flood level) to enhance resilience against heavy rainfall and flooding; (ii) construction of composting and biogas plants with flood protective measures; (iii) construction of fecal



sludge management (FSM) systems with resilient superstructure and raised platform (above flood level); and (iv) hygiene promotion, awareness program on sanitation, FSM, and safe water use, training on Operation and Maintenance (O&M) of the WASH interventions including climate vulnerability and disaster risks. Community mobilization will be critical for behavioral change as well as the O&M of the facilities. These interventions will contribute to improve inadequate sanitary and hygiene conditions in the camps, soil and water contamination due to untreated fecal discharge to the environment, and to produce agricultural fertilizer and a clean renewable energy source for community use.

*Subcomponent 1.B: Basic Services, Resilient Infrastructure, and Emergency Response*

23. The objective of this subcomponent is to support improved access to basic services, climate resilient infrastructure, and emergency response services.

24. This subcomponent will finance: (i) construction of climate resilient multi-purpose disaster shelters/primary schools and multi-purpose disaster shelters/community service centers including rainwater harvesting and climate proofing connecting roads (above flood level) to provide safe haven from storm surges and strong winds; (ii) sealing the surface of access and evacuation roads as well as construction of internal roads, including associated stormwater drainage network and slope protective works to reduce the risk of landslides; (iii) construction of culverts and bridges (aligned with the storm water drainage network) to drain the increased surface run-off from extreme precipitation and flooding; and (iv) repair, rehabilitation and construction of rural markets for DRPs. The provision of basic infrastructure such as sealing the surface of roads, stormwater drainage network, slope protective works will also benefit to reduce soil erosion and surface water contamination, and improve hygiene condition in the camps. To the extent possible, principles and standards for Building-Back-Better will be incorporated in the design and execution of subprojects to ensure increased sustainability and resilience.

25. This subcomponent will also support improved emergency response services through: (i) contingency planning for evacuation and emergency preparedness; (ii) improved search & rescue operations including equipment and training of the first responders, Fire Service and Civil Defence (FSCD); and (iii) strengthening community based early-warning systems for hydro-meteorological hazards.

26. This subcomponent will support improvements in public services through: (i) new site plans for service delivery for Cox's Bazar District and identify needed infrastructure; (ii) installing street lights systems in existing DRP camps to help increase safety, in particular of woman and children; (iii) installing lightning protection systems in DRP camp areas to decrease vulnerability to lightning strikes; and (iv) the improvement of drainage to reduce flooding, landslides as well as improve accessibility.

27. To ensure that the benefits of the project reach everyone in an inclusive manner, a concerted effort will be made to: (i) design services in a gender-informed manner and reach women and girls through appropriate targeting approaches; (ii) the promotion of child-friendly and disability friendly approaches to service delivery; (iii) mobilize local communities to ensure the participation and inclusion of the most vulnerable groups through the use of the organizations and volunteers described below under component 2; and (iv) formation of water and sanitation committees for O&M.



**Component 2: Strengthening of Community Resilience (US\$35 million)**

28. This component will address economic and social resilience through a workfare scheme (public works) which will support the participation of DRPs, particularly woman and at-risk youth, through subprojects intended to enhance the provision of services for their own community. Through this component, DRP households will participate in subprojects intended to enhance community services for the vulnerable (woman, children, disabled and elderly), strengthen their engagement mechanisms (through mobilization, outreach and GRM activities) and prevent anti-social behavior.

29. Beneficiaries will be selected from among the DRP community to participate in subprojects that will be selected on a demand basis, subject to prioritization of identified prevailing needs by camp authorities. Inclusive community services will prioritize subprojects that fill service-gaps for vulnerable groups, while the community workfare will vary depending on the seasonal/climatic needs. Adequate training will be provided to the participating DRP community members to perform their respective tasks. Attendance will be monitored and wages provided through a secure, transparent and accessible mechanism.

*Subcomponent 2.A: Community Services*

30. The objective of this subcomponent is to engage women, working-age children, elderly and persons with disabilities in subprojects that provide community services to the vulnerable population. This component will also support community engagement activities which will be carried out through a network of Rohingya volunteers and will cover about 60,000 beneficiary households. It will finance: (i) wages for subproject participants; (ii) supporting tools and materials; and (iii) subproject management activities (this includes subproject planning, selection of beneficiaries, daily supervision of works and wages delivery).

31. This subcomponent will support the implementation of the following types of subprojects: awareness generation of climate and disaster risk resilience or mitigation, community based early warning systems of cyclone and flood, adoption of clean energy for cooking which will serve to reduce deforestation for firewood collection; nutrition, as well as prevention of child abuse, child marriage, GBV, sexual harassment, trafficking of women and children, illegal drug trade, child care and elderly support services, distribution and training on use of improved cooking stoves/LPG, community group-facilitation, grievance management volunteer groups; communication and outreach activities, as well as awareness-raising activities. Implementation will be supported by a UN agency and or a Civil Society Organization (CSO) and details will be described in the Project Operational Manual.

*Subcomponent 2.B: Community Workfare*

32. This subcomponent aims at reducing the likelihood of at-risk-youths' participation in anti-social behavior by engaging them through workfare in basic-infrastructure maintenance to reduce climate vulnerability and disaster risks as well as cleaning activities. This subcomponent will therefore finance: (i) wages for beneficiaries in exchange for their work rehabilitating or maintaining the environment where they live or camp assets; (ii) the capital inputs for the sub-projects; and (iii) supervision of the community workfare. The wage rate will be set at the prevailing official minimum wage for the DRP and as determined



by the district authorities and the ISCG. Each beneficiary household representative will work for a maximum of 120 person-days for a period of three years. Simple community workfare which is unskilled labor intensive by nature includes slope protective works, stormwater drainage network as well as Bag gardening/vegetation for soil retention/planting trees. These interventions will reduce the vulnerability to landslides and soil erosion, provide vegetation cover in the camp sites as well as drain the increased surface run-off from excessive rainfall inside the DRP camp area. The use of labor-intensive technologies in the construction and maintenance of these infrastructure cuts down the emission of greenhouse gas emissions in otherwise machine dominated constructions/ maintenance.

33. The number of beneficiaries in each camp will be selected according to the relative population of each camp. Approximately 40,000 households with able-bodied adults (preferably 16 to 29) willing to accept the prevailing wage rate will self-select to work. If the number of eligible people exceeds the opportunities available, a first-come first-serve approach will be used to select the beneficiaries. A waiting list will be kept for participant turn-over. Each household will be allowed to register two eligible adults as alternate participants, to ensure that on occasions where the selected household representative is not available, the alternate could work in his/her stead to guarantee continuous participation in the community works for the household.

34. Community subprojects will be selected by the CiCs in conjunction with UN agency/CSO that will be supporting the implementation. Approval of the sub-projects to be implemented will be provided by the RRRC under the condition that a minimum of 80 percent of the combined subprojects expenditure for the camps will be paid as wages to extremely poor households who work on these assets. Priority will be given to at-risk-youth. Eligible subprojects selected from camps will be validated with communities to ensure that the needs and interests of beneficiary communities are served. As a precondition for eligibility, the camps will be required to put in place and record arrangements to maintain the assets that will include further work by the beneficiaries. CSOs will be engaged to provide quality assurance for the assets. Payments will be made through the e-voucher scheme supported by the WFP. Details of the investment menu of these sub-projects will be detailed in the Operational Manual.

### **Component 3: Strengthening Institutional Systems to Enhance Service Provision to the Displaced Rohingya Population (US\$15 million)**

35. The objective of this component is to strengthen the Government of Bangladesh's mid and long-term capacity to plan and coordinate DRP response (including disaster response), manage and coordinate project implementation as well as capacity augmentation to manage future disasters and climate vulnerability.

#### *Subcomponent 3.A: Strengthened MoDMR, NTF, RRRC, CiC and Line Ministry Systems*



36. MoDMR has historically played an important role in similar influx management in Bangladesh. MoDMR's Refugee Cell leads the coordination of refugee related initiatives and has direct oversight of the Refugee Relief and Repatriation Commissioner (RRRC at the district level which is represented by the CiCs at the camp level). According to GoB's Allocation of Business (revision Dec. 2014)<sup>23</sup>, MoDMR is mandated to coordinate all activities related to emergency response management besides disaster management. However, to fulfill this central coordinating role, MoDMR's capacity needs to be increased through strengthened institutional and administrative systems at the national, district and camp level.

37. **National:** At the national level, this subcomponent aims to enhance overall capacity of MoDMR and other GoB agencies to plan, coordinate and respond to emergency including extreme hydromet events through: (i) policy dialogue and coordination support;<sup>24</sup> (ii) exchange and knowledge sharing; (iii) technical advisory to improve planning of crisis response; (iv) top-up to civil servant salaries and consultant remuneration; (v) development of refugee-crisis information management systems as well as benefit transfer mechanism; and (vi) central level communication and reporting mechanism.

38. **RRRC:** To strengthen this unit's capacity to coordinate, have oversight and report on field activities including: (i) technical advisory to improve planning and management of multi-agency activities; (ii) information systems, equipment and training to manage the reporting mechanism, benefit transfer oversight and refugee registry; (iii) develop GRM management capacity; (iv) logistics and technical support for improved coordination; (v) consultant remuneration for coordinator at the RRRC; and (vi) staff salaries for two hotline operators.

39. **Camp-level:** To CiCs' governance and DRP engagement capacity as well as fostering community participation through the enhancement of the Rohingya volunteer network and the setup and deployment of the grievance redress mechanism. This activity will finance: (i) two staff at the CiC level (one for GRM and one volunteer network supervisor); (ii) training and technical assistance on grievance management, community engagement and gender mainstreaming; and (iii) laptops and internet connectivity.

40. **DRP Engagement Structure (Volunteer Network).** Presently, the CiC personnel mobilize DRP through a volunteer network comprised of Rohingya community leaders (known as Majhi). This project will support the enhancement of the volunteer network to serve as the Government's main DRP engagement structure which will serve as the last mile delivery tool through which LGED, DPHE and MoDMR will streamline outreach, behavior changing communication (through ToT strategies) as well as the grievance redress mechanism. The DRP engagement structure will not only provide social resilience activities to the population, particularly women (supported through subcomponent 2A inclusive community service), but it will allow for the contextualization of the messaging and awareness-raising activities to the culture and language of the DRPs. For this purpose, this subcomponent will finance the service of a specialized agency (SCO) to set-up and facilitate the functioning of the DRP engagement system. The SCO will hire experienced staff to be placed at the CiC office to recording of grievances and communicate feedback once the grievance is resolved. The agency will also facilitate, supervise and monitor the DRP engagement mechanism, which includes: i) selection and training of volunteers; ii) monitoring and reporting activities; iii) periodic CiC-volunteer meetings; and iv) distribution of IEC

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<sup>23</sup> Cabinet Division, Bangladesh.

<sup>24</sup> As the Inter-Ministry Meeting on Execution, Monitoring and Coordination of Humanitarian Assistance activities for Forcibly Displaced Myanmar Nationals (headed by MoDMR) and the National Task Force (led by MoFA).



materials. The volunteers will be incentivized to perform their respective functions through a stipend which will be provided through subcomponent 2A “Inclusive Community Services.”

41. **Grievance Redress Mechanism (GRM).** In order to set up, monitor and streamline the Project’s GRM, this subcomponent will finance: i) protocol design; ii) setting-up the manual system (manual forms and registers, training and outreach); iii) digital system development (software, computers, printers, telephones, mobile application, internet and electricity); iv) operation space (desks and chairs); and v) grievance hotline (service contract).

42. **Communication systems.** The communication activities will support the strengthening of a beneficiary communication and feedback loop which consists of a DRP volunteer network at the camp level that will serve as a vehicle for all project beneficiary engagement activities. Through it, LGED, DPHE and MoDMR will streamline outreach, behavior changing communication (through ToT strategies) as well as the grievance redress mechanism. This mechanism will not only provide social resilience activities to DRP, particularly women (supported through the community services subcomponent), but it will allow for the contextualization of the messaging and awareness-raising activities to the culture and language of the DRP. Communication activities will be implemented by a firm that will be contracted by MoDMR.

*Subcomponent 3.B: Institutional Strengthening of LGED, DPHE, FSCD, LGIs, and GBV services*

43. This subcomponent will strengthen the capacity of government agencies and build their resilience to provide essential services and respond effectively to the crisis including extreme hydro-meteorological events. To the extent possible, the project will also encourage harmonization or transfer of systems and capacities between UN, other specialized agencies and the GoB, in provisioning of basic services and infrastructure improvement and will also focus on the gradual transition of service delivery from humanitarian to country systems.

44. DPHE is the lead agency responsible for drinking water supply and sanitation in the country apart from the jurisdiction of Water and Sewerage Authority (WASA)s of Dhaka, Chittagong and Khulna. Improving their service delivery will also support the local government institutions (LGIs) in the development and O&M of the water and sanitation facilities. Access to improved and resilient water supply and sanitation facilities is expected to contribute to poverty reduction and gender equality among the beneficiary populations by addressing burdens especially borne by women and girls. This includes the benefits of reduced time and effort spent in collecting water, as well as associated benefits such as personal security, health, and economic productivity. The proposed intervention will emphasize the role of women in the decision-making process at various stages of system design, implementation, and management to improve the sustainability of investments and improve the quality of life. Gender disaggregated indicators will be used to track gender equity in roles and benefits from the project.

45. This subcomponent will enhance the institutional capacity of DPHE, LGIs through: (i) technical training of DPHE, and local government staff; (ii) strengthening the technical capacity of DPHE to improve the camp sanitation, fecal sludge management, and safe water use; (iii) training of frontline public health workers; (iv) training on community WASH management.

46. LGED is the lead agency to develop rural and urban infrastructure as well as small scale-water



resources. In addition, they construct primary schools and have been the implementing agency for all Bank financed multi-purpose disaster shelters. They are also responsible for roads, bridges, culverts as well as emergency constructions, repair, and maintenance after disaster. This subcomponent will enhance the capacity of LGED, LGIs through (i) technical training of LGED, and local government staff; (ii) strengthening the technical capacity of LGED to develop risk-informed maintenance guidelines for the roads and associated drainage network; (iii) Develop a training and capacity building program for LGED to evaluate additional resilience-enhancing measures and to prepare guideline to consider resilience in design of road works; (iv) training of LGED officials on Geohazards (earthquake and landslides) risks on road network; (v) technical assistance to support new site plans for service delivery and identify needed infrastructure (internal roads, street lights, lightning protection systems, drainage, markets).

47. To increase the coordination among the implementing agencies, this subcomponent will also provide combined training and capacity building sessions. Training of LGED and DPHE officials on (i) Hazard, Vulnerability and Risk Assessment; (ii) research and development approach; and (iii) technology and information sharing. Combined training of LGED, DPHE, FSCD, LGIs will also be supported through this subcomponent on ICT monitoring, knowledge sharing, emergency crisis response during disasters (including refugee influx) as well as augmenting the capacities of agencies in Cox's Bazar to future disasters and climate vulnerability.

#### *Subcomponent 3.C: Institutional Strengthening for Gender, Social Inclusion, and GBV Prevention and Response*

48. This subcomponent will strengthen the capacity of institutions to address barriers including climate vulnerability and disaster risks that certain disadvantage groups may have to access project benefits, and will support the scale up of existing GBV prevention and response initiatives in the camps. It will finance: (i) assessments to determine barriers including extreme hydro-meteorological events as well as geophysical-hazards to access services in the camps and ways to address them; (ii) technical specialists in each PIU to mainstream the analysis findings throughout project interventions; (iii) the establishment and operation of gender-friendly spaces which would be linked to the GBV referral pathway, and be a safe space for women and adolescent girls; (iv) scale up of GBV prevention and treatment services to be delivered through the women and children centers, door to door services, and interactive workshops on general and specific topics; (v) development of a GBV referral pathway that will link with the ongoing Bank-financed Health Services Project in support of the DRPs and existing referral pathways being implemented by other development agencies; and (vi) development and implementation of a GBV prevention program for adolescent boys. When appropriate, the outreach activities of this subcomponent will be carried out by DRPs themselves through Subcomponent 2.B.

#### **Component 4: Contingent Emergency Response Component (CERC) (US\$0 million)**

The objective of this subcomponent is to cater to unforeseen emergency needs. In case of a major natural disaster, the Government may request the Bank to re-allocate project funds to this component (which presently carries a zero allocation) to support response and reconstruction. Disbursements under CERC will be contingent upon the fulfillment of the following conditions: (i) the Government of Bangladesh has determined that an eligible crisis or emergency has occurred and the Bank has agreed and notified the Government; (ii) the Ministry of Finance has prepared and adopted the Contingent Emergency Response





(CER) Implementation Plan that is agreed with the Bank; and (iii) LGED and MoDMR have prepared, adopted, and disclosed safeguards instruments required as per Bank guidelines for all activities from the CER Implementation Plan for eligible financing under the CERC.

## **E. Implementation**

### Institutional and Implementation Arrangements

49. The Government will have overall responsibility for project management and coordination through its Ministry of Local Government, Rural Development, and Cooperatives (MoLGRD&C) and the Ministry of Disaster Management and Relief (MoDMR). Project Steering Committees (PSC) will provide overall project oversight and policy direction.

50. There will be two PSCs established, one chaired by the Sr Secretary/Secretary, LGD, MoLGRD&C and the other by Sr. Secretary/Secretary MoDMR. The PSC is expected to include representatives from ministries, division, departments/agencies that are part of overall coordination and strategy. The Committee will provide an oversight function to ensure project activities follow appropriate parameters and are well coordinated. Specifically, the PSC will be responsible for: (a) providing policy advice and operational guidance; (b) reviewing financial and physical progress; (c) resolving any implementation problems and addressing grievances; and (d) providing any other necessary direction for effective implementation.

51. The project will be implemented by three implementing agencies, LGED, DPHE, and MoDMR with three separate Project Implementation Units (PIU) and three Designated Accounts and respective Procuring Authority. There will be three Project Directors (PD), one for LGED, one for DPHE and one for MoDMR and there will be one Focal Person from FSCD.

52. Component 1a will be implemented by DPHE, Component 1b will be implemented by LGED on behalf of both LGED and FSCD. Component 2 will be implemented by MoDMR. Component 3a will be implemented by MoDMR. Component 3b will be implemented by LGED and DPHE. Reporting to the Bank will be through the Project Directors of LGED and MoDMR. LGED will consolidate reporting on behalf of LGED, DPHE, and FSCD, the reporting mechanism will be detailed in the Partnership Agreement.

53. Currently, as LGED is already implementing the IDA financed US\$375 million Multi-Purpose Disaster Shelter Project (MDSP), with an existing Project Director, Project Implementation Unit (PIU) and interventions in the Cox's Bazar District, it was agreed the existing MDSP PD will be the PD of the proposed project's LGED related component and the existing MDSP PIU and MDSP Procurement Panel would provide necessary support to the project. This setup is not expected to have any implications for the continued successful implementation of MDSP.

54. This existing MDSP PIU would be strengthened to implement additional activities proposed under the proposed Project. MDSP and this proposed Project would maintain separate Deputy Project Directors (DPDs). It will continue to have a central project office located at the headquarters of LGED Dhaka. Most



of the procurement and financial management activities would be undertaken at the headquarters office while LGED's field level setup would support the construction supervision.

55. LGED will hire a Senior Technical Specialist, Senior Procurement Specialist, Senior Financial Management Specialist, Senior Environment Specialist, Field level Environmental Specialist, Senior Social Development Specialist, Field level Social Development Specialist, Gender Specialist, Field level Gender Specialist, Communication Specialist, Disaster and Climate Change Specialist, Senior Monitoring and Evaluation (M&E) Specialist, M&E Specialist, and a GIS specialist. LGED will also hire a Design and Supervision Firm, which will include an Environmental Safeguards Team and a Social Safeguards Team who will be responsible for carrying out the environmental and social assessments and prepare all necessary safeguards documents and will monitor the implementation of the safeguards requirements. LGED will hire the Cumulative Environmental and Social Impact Assessment (CESIA) Firm. LGED will also hire a UN Specialized Agency to address Gender and Social Inclusiveness and Preventing Gender Based Violence.

56. DPHE PIU will have a dedicated Project Director and two DPDs. DPHE will hire a Procurement Specialist, Financial Management Specialist, Water Supply Specialist, Sanitation Specialist, Waste Management Specialist, Hydrologist, Environmental Specialist, Social Development and Gender Specialist, M&E Specialist, Training Consultant. A Monitoring & Supervision as well as feasibility study Firm, Social Impact Assessment Firm and an Environmental Impact Assessment Firm will also be hired.

57. MoDMR will be the implementing agency for Component 2. A dedicated PD, not below the rank of Joint Secretary, and two DPDs will be appointed to ensure smooth project implementation and supervision. A PIU will be set up within the Refugee Cell to assist the PD in project management. The PIU will include a Procurement Specialist and a Financial Management Specialist for fiduciary management; Program Specialists (one of whom will be the gender focal point); Information Management/Database Specialist, and Training and M&E Specialist, and a field based environmental safeguards specialist and a social safeguards specialist. A UN Specialized Agency will be hired by MoDMR, which will include the necessary expertise in Environmental and Social Safeguards, to carry out the Safeguards compliance requirements. One forestry specialist will be employed within the UN Specialized Agency who will ensure only endemic species are introduced and organic fertilizer is applied as part of the tree plantation.

58. The Refugee Cell and its field level team represented by Camp-in-Charges/Refugee, Relief and Repatriation Commission (RRRC) will also be supported by qualified service provider(s), including specialized agencies, to coordinate and administer day-to-day activities under this component. This will of comprise beneficiary enrollment; compliance and sub-project monitoring; payments; and training and administrative systems development and management.

59. The Project will use existing implementation arrangements of the GoB and all implementation on ground will be coordinated through the existing Government mechanism. The existing Development Partner/Multi-Lateral/Bi-Lateral/UN Agencies coordination mechanism in the field will be through the ISCG and coordinated in Dhaka by the Strategic Executive Group (SEG).

60. There will be inter-agency field level coordination on project activities with the RRRC, the Deputy Commissioner, the ISCG, and the implementing agencies. This is in-line with the overall coordination and



communication arrangements in the country regarding the Rohingya influx. Furthermore, the activities for all the investments will be complementing that of the GoB, Asian Development Bank, and other Agency interventions, to avoid any duplication or overlap.

61. The overall coordination will be overseen at the national level by the National Task Force (NTF), which is an inter-ministerial body with secretarial services provided by the Ministry of Foreign Affairs. Project updates and briefings, including Aide Memoires will be regularly shared with the NTF for information purposes.

To ensure the proper management of safeguards aspects under the Project, field level officers will be responsible for liaising with the UN agencies and other entities which may be sub-contracted, and ensuring that the Bank's policies are adhered to, similar arrangements will have to be established at every layer of contracting.

62. LGED, DPHE, and MoDMR will support to conduct the Cumulative Environmental and Social Impact Analysis (CESIA). The LGED, DPHE, MoDMR PIUs may be strengthened with additional staff as required and as agreed with the Bank. LGED (incorporating the update from DPHE) and MODMR both will prepare separate monitoring reports and will share with World Bank quarterly.

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

The project activities will be primarily concentrated in Ukhia and Teknaf upazila of Cox's Bazar district and Naikhongchari upazila of Bandarban district, which are the southernmost upazilas of the country. Deforestation and forest degradation have taken place concurrently as forest resource extraction has become a secondary occupation for coastal households. The region, now a degraded forest land, includes three Ecologically Critical Areas - the western, coastal zone of Teknaf Peninsula, St Martin's Island, and Sonadia Island, and two Protected Areas - the Himchari National Park and the Teknaf Wildlife Sanctuary. Camps are surrounded by an important habitat of critically endangered Asian Elephant in Bangladesh and also fall within active elephant migration routes. The area of the camps has a history of occurrence of landslides, earthquakes, flash floods and tidal surges. Although the main area of the DRP camps is located outside of the flood zone, the camps are vulnerable to extreme weather events such as cyclones and landslides. The steep slopes may become unstable in the monsoon seasons and cause landslides. This situation has aggravated due to clearance of the vegetation cover to accommodate DRP camp. In fact, with the advent of monsoon, several small-scale landslides have occurred in the camps and the general vicinity. Some settlements have been moved from the most precarious slopes to a new extension area (Camp 4 extension). In general, neither the structures in the DRP camps nor those in the makeshift settlements are able to withstand cyclones or floods. The main registered camp at Kutupalong is entirely on public land (various entities including Department of Forest), some of the unregistered camps in Teknaf are on private lands (needs further assessments to ascertain the amount of private land, specific ownership types, number of DRPs in the different camps). DRPs are in some cases paying nominal rent for staying on these lands. The situation within the camps is extremely congested. All aid workers are required to leave the premises by



5:00 pm. There are significant risks associated with gender based violence, trafficking, safety of adolescents and children, inclusion of vulnerable groups such as the latter and the elderly and people with disabilities (many DRPs carry came in seriously injured state).

**G. Environmental and Social Safeguards Specialists on the Team**

Sabah Moyeen, Social Specialist  
Nadia Sharmin, Environmental Specialist  
Takeaki Sato, Environmental Specialist

**SAFEGUARD POLICIES THAT MIGHT APPLY**

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The Project will include construction, reconstruction and rehabilitation of internal roads, access roads, culverts, bridges, disaster shelters, community markets, individual and community WASH, FSM and introduction of alternative cooking stoves to reduce dependence on fuelwoods for cooking and loss of forests which will not only reduce the vulnerability of the DRP to natural disasters and fire hazards, but also provide basic facilities and help improve the degraded environment. Although the project areas of the proposed project are highly sensitive because registered camps are in degraded forest areas including the Teknaf Wildlife Sanctuary and other Reserved Forest areas, the potential environmental impacts of the activities are expected to be site-specific, reversible, and mitigatable.</p> <p>Notwithstanding the small-scale nature of the project intervention, the project is classified as Category A considering potential significant environmental and social risks and residual impacts associated with the project areas such as disturbance of the forest areas, Human Elephant Conflict (HWC), GBV, voluntary shifting/land donation and relationship between DRP and host communities and introducing small scale</p>



infrastructural development in the historically reserved forest area.

The Project is processed as per the emergency procedures defined by IPF Bank Policy paragraph 12. Therefore, a Safeguard Action Plan (SAP) is developed as an annex to the PAD to provide a detailed timetable with sequential steps for preparing the relevant safeguards instruments, and the preparation of the safeguard instruments are deferred to the project implementation. Since exact location and design of each investment is unknown, in order to ensure the proper management of potential environmental impacts from the Project activities, an Environmental and Social Management Framework (ESMF) will be prepared, consulted on both with DRP, host communities, relevant stakeholders, and disclosed in country and on the World Bank’s external website before the project Effectiveness. The ESMF will recommend specific measures to mitigate potential environmental and social impacts from Project activities, based on the result of environmental and social screening against each investment. Subsequently, environmental and social assessment instrument for each investment would be prepared and implemented, if required, before the commencement of any physical activities.

In addition, given the wide range of activities carried out by different organizations, cumulative environmental and social impact is becoming a growing concern in the DRP camps and surrounding areas. Therefore, Cumulative Environmental and Social Impacts Assessment (CESIA) will be conducted during project implementation, and the ToR for the assessment will be included in ESMF.

Performance Standards for Private Sector Activities OP/BP 4.03	No	This policy is not triggered since no private sector activity is included in the project.
Natural Habitats OP/BP 4.04	Yes	The registered camps are located in the areas converted from the forest lands including the Teknaf Wildlife Sanctuary and other Reserved Forest areas. These camps are situated on or near the original elephant migration routes and the incidents of human elephant conflict have been reported after influx of DRP in the last year. The camp areas have



		been already developed and currently there are only limited small forest patches and remaining trees within camp sites. However, the camp sites are surrounded by the remaining forest areas which elephants use as their habitat. Therefore, ESMF will include the screening procedure to ensure to exclude the remaining forest areas and elephant migration routes from the location for each specific investment. When necessary, screening exercise would suggest to prepare further mitigation measures to protect natural habitat.
Forests OP/BP 4.36	Yes	As mentioned under OP4.04, since the project area is located in the degraded forest areas close to the remaining forest area, this policy is triggered. The screening procedure included in ESMF will ensure each investment will not affect remaining forest and propose additional mitigation measures when necessary.
Pest Management OP 4.09	No	The project neither procure pesticides and pesticide application equipment nor alter the existing pest management practices.
Physical Cultural Resources OP/BP 4.11	Yes	This policy is triggered because the investment activities to be financed under the project may be located in areas containing physical cultural resources. The ESMF for the proposed project contains specific measures relating to avoid and/or managing potential impacts on PCRs, compliant with the requirements of this policy. A chance find procedure is also included in ESMF.
Indigenous Peoples OP/BP 4.10	No	There are indigenous people present in Cox’s Bazar District but not in the project areas.
Involuntary Resettlement OP/BP 4.12	Yes	The project activities will include small-scale infrastructural development like construction of access roads, disaster shelters, WASH intervention, solid waste collection and management facilities, reduction of pressure on fuel wood etc. The proposed infrastructure will be developed within the camps sites, but there will be requirements for access roads and some supporting infrastructure outside the camps (for lack of space within the camps and for access ability purposes). The main registered camp at Kutupalong is entirely on public land (various entities including Department of Forest), some of the unregistered camps in Teknaf are on private lands (needs further assessments to



ascertain the amount of private land, specific ownership types, number of DRPs in the different camps). DRPs are in some cases paying nominal rent for staying on these lands. Since acquisition cannot be an option for the project (given the emergency nature of the intervention, and necessity to manage the relationship between host and DRPs), voluntary arrangements such as MOUs and/or renting leasing (where appropriate, because the interventions may not all be discrete, but take the form of network laying, water supply pipes etc.) will be considered. No land acquisition will be permitted under the project.

In all the camps, it may be necessary to shift or re-align some structures (expected to be few in terms of scale, involving quick rebuilding in nearby spaces within the camps) to make way for the infrastructure and service provision envisioned by the project. All such activities will be done on a purely voluntary basis, and after the shifting and rebuilding activities are completed (the tents and bamboo structures with plastic sheeting for roofs are makeshift in nature and can be quickly rebuilt) by the responsible agencies. It may be mentioned that some UN agencies (being considered for implementation of activities) have similar (in some cases stricter) policies on the above-mentioned issues as the Bank. A gap analysis will be undertaken. OP 4.12 will be triggered as a precaution, and especially for the private lands in case it is absolutely necessary to compensate local owners (for crop-losses, or losses accruing from dumping/moving construction materials etc.). The government will in all probability not allow any kind of cash compensation for DRPs for any impacts incurred, hence all adverse, involuntary resettlement related impacts on DRPs have to be avoided.

The ESMF will include RPF and lay out the guidelines for all the above proposed activities, based on a detailed assessment and field level consultations. In addition, other assessments will be carried out for gender and gender based violence, host community and DRP dynamics, social inclusion dimensions identifying vulnerabilities such as women and children, elderly and people with disabilities, among others.



Safety of Dams OP/BP 4.37	No	<p>The project neither involve dam construction/rehabilitation nor does not depend on the existing dams.</p>
Projects on International Waterways OP/BP 7.50	Yes	<p>Water supply and sanitation activities under Component 1 of the Project will imply the use of groundwater from aquifers [potentially linked to the Naf River] that are international waterways as defined in paragraph 1 of the Policy. The rehabilitation will not lead to any increase in groundwater use, and thus would also have no impact on the flows in the Naf River beyond that may be already taking place. For surface water, the Project will support the carrying out of water resource surveys and feasibility studies for future surface water based water supply schemes of the Naf river, including bathymetric surveys in the rivers, river cross section surveys, ecological surveys, testing of water samples, monitoring seasonal variation of water flow in the river, testing of soil sample from river bed, etc. It will not undertake detailed designs and/or engineering activities for projects that may involve use or pollution of water in international waterways. The Project will rehabilitate deep tubewells and mini-piped water supply systems for 214,250 beneficiaries in the targeted camps. The Naf River rises in Myanmar and flows into the Bay of Bengal, the lower part of the river marks the border between Bangladesh and Myanmar. There are no treaties/agreements between Bangladesh and Myanmar relating to the Naf River, and no formal bilateral arrangement requiring riparian notification. Considering above, it is concluded that these activities meet the elements for an exception to riparian notification under the paragraph 7 (a) and (b) of the Policy. Therefore, OP7.50 is triggered and the approval for exception to riparian notification was obtained from Regional Vice President of the Bank on September 6, 2018.</p> <p>For surface water, the Project will support the carrying out of water resource surveys and feasibility studies for future surface water based water supply schemes of the Naf river, including bathymetric surveys in the rivers, river cross section surveys, ecological surveys, testing of water samples, monitoring seasonal variation of water flow in the</p>





river, testing of soil sample from river bed, etc. It will not undertake detailed designs and/or engineering activities for projects that may involve use or pollution of water in international waterways.

Projects in Disputed Areas OP/BP 7.60

No

The project is not carried out in the disputed area.

## 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 project will involve small scale civil works such as internal/access road rehabilitation, construction of multi-purpose disaster shelters, construction of WASH facilities, Fecal Sludge Management and solid waste collection at the selected communities and does not envisage large scale, significant environmental impact. However, considering potential significant environmental and social risks associated with the project areas such as disturbance of the forest areas, Human Elephant Conflict (HWC), GBV, voluntary shifting/land donation and relationship between DRP and host communities, the project is classified as environmental Category A. As the project activities will be taken place within important forest landscape, OP 4.04 Natural habitat and OP 4.36 Forests are triggered. The project area is situated adjacent to critical habitat for wildlife, including the migration route of critically endangered Asian Elephant and there are evidences of active HWC around the camps with unfortunate loss of human lives. As a result, it is imperative to carefully screen the potential locations of all physical investments to avoid the elephant migration routes and any clearance of the remaining forests, and to propose any necessary mitigation measures. IUCN Bangladesh has already produced a map of all elephant migration routes for the area and this map will be used as a basis for the screening, which will be defined in ESMF, to avoid possible conflicts. All the physical investments will be subject to environmental and social screening during selection in order to prevent any significant negative environmental and social impacts. The proposed activities will take place within the camp sites, but there will be requirements for access roads and small bridges to improve connectivity; issues of labor influx; economic impacts (could be beneficial or adverse) and the nature of services and infrastructure proposed under the project may affect the wider host community. The ESMF will be prepared based on detailed baseline assessments and consultations in both the host communities and the DRPs in the camps, as well as the private owners who will be identified as per official records (including details of titleship, nature of ownership etc.). The ESMF will provide guidance for any resettlement related activity as identified through the assessments, as well as providing guidance for consultations and documentation for any voluntary shifting or permission to use that may be required. The ESMF will also be fully cognizant of the significant accessibility and social inclusion issues, not only in terms of ensuring that all the infrastructure developed under the project are accessible to persons with disabilities, and inclusive towards women and children and other more vulnerable people within the DRPs, but also that they have adequate voice in the consultations feeding into the design of the project and access to the Grievance Redress Mechanism (GRM) being developed for the project (consultants have been hired to help design the GRM based on assessments of existing systems, local/informal structures and community based approaches within the camps, which are working. The firm will demonstrate what is working and can be leveraged/enhanced, and what is not, so as to avoid duplication and confusion amongst the DRPs).

The proposed project will also create the positive environmental impacts through implementation of a series of activities. The construction of latrines, fecal management systems and composting and biogas plants under



subcomponent 1a will contribute to improve inadequate sanitary and hygiene conditions in the camps and soil and water contamination due to untreated fecal discharge to the environment, and to produce agricultural fertilizer and a clean renewable energy source for community use. The subcomponent 1b will benefit to reduce soil erosion and surface water contamination and improve hygiene condition in the camp through provision of basic infrastructure such as sealing the surface of roads, stormwater drainage network, slope protective works. Provision of an alternative fuel under Component 2a will contribute to reduce firewood collection from remaining trees within camp site as well as the forest surrounding the camp sites. Tree planting conducted under Component 2b will partially serve to restore degraded forest cover areas with shaded trees and hedges and to reduce vulnerability to landslides and soil erosion in the camp sites.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: Given the small scale nature of the project, the project itself is not expected to entail potential indirect or long term impacts. However, There are existing and planned activities to establish/improve basic services and infrastructure for DRP carried out by UN agencies (e.g. WFP, WHO, UNICEF, UNFPA, UNHCR, UNDP, IOM), humanitarian financiers (e.g. ECHO), key bilaterals, government and international and local NGOs. These include the areas of food security, nutrition, health, shelter, education, WASH and social protection. While potential impacts from such individual activities are mostly insignificant, the large number of small scale activities would result in potential cumulative environmental and social impacts as a whole. Therefore, the project will conduct a Cumulative Environmental and Social Impact Assessment (CESIA) to assess the incremental and combined effects caused by the existing and planned development in and around the camp sites, and to propose the necessary management measures during the project implementation. For this purpose, ESMF to be prepared before effectiveness of the project will contain a terms of reference of CIA.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts. There are no relevant alternatives that could be considered at the project level. Alternatives including technical specification and location will be considered through the environmental and social screening process of each investment.

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. The Project is processed as per the emergency procedures defined by IPF Policy paragraph 12. Therefore, a Safeguard Action Plan (SAP) is developed by Appraisal to provide a detailed timetable with sequential steps for preparing the relevant safeguards instruments, and the preparation of the safeguard instruments are deferred to the project implementation. Since exact location and design of each investment is unknown, in order to ensure the proper management of potential environmental impacts from the Project activities, an Environmental and Social Management Framework (ESMF) will be prepared, consulted on both with DRP, host communities, relevant stakeholders, and disclosed in country and on the World Bank's external website before the project Effectiveness. The ESMF will recommend specific mitigation measures for potential environmental and social impacts from Project activities, based on the result of environmental and social screening against each investment. In addition, environmental and social assessment instruments will be prepared and implemented, if required, before the commencement of any physical activities.

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

Key stakeholders include project beneficiaries, Government entities, development partners as well as NGOs and community based organizations. Several field trips and many rounds of consultations have taken place with all the



mentioned stakeholders on the needs assessment that precedes the project design and also the project design, situation analysis etc. There is clearly a critical need for the activities envisioned under the project. For Component 1, the proposed activities are indicative and may be adjusted in consultation with these key stakeholders as the situation evolves. For Component 2, in each camp, a community workfare implementation committee will be formed, through community consultation, consisting of the Camp-in-Charge (CIC) who are the GoB's officials assigned for camp administration at the last mile, representatives of the specialized agency/NGO appointed by MoDMR and members of the camp with female representation. LIPWs will be identified by this committee. The committee will also be responsible for implementing and monitoring the community workfare and maintaining it following completion.

In addition, sentiments of distrust and tension between the host population and the DRP may build up in the region, and concerns of subsequent radicalization are running high, the project integrates measures to avoid aggravating conflict as a consequence of the project interventions, while also addressing the drivers of conflict through community consultation and participation which have proven to help support social cohesion and foster inclusion of marginalized groups, including women, DRPs and minority clans. The Project thereby will employ consultative approaches for determining beneficiaries, and in implementing other aspects of the project in collaboration with local stakeholders, district-level authorities and civil society organizations.

PIUs have conducted initial consultation with beneficiaries, host communities and development partners. Overall, their reactions to the project is positive. The project is expected to improve the access to the basic services supplementing the supports which have been provided by the other organizations and to strengthen the disaster and social resilience of DRP. The importance of the coordination of activities was raised from the development partners. The project will utilize the existing implementation arrangements of the GoB and project activities will be coordinated through the existing government's coordination mechanism.

GRM will be established as a part of Component 3 on the basis of the existing governing mechanisms in the camps as much as possible. The CIC office will periodically consolidate and register the grievance cases including environmental and social safeguard related complaints. A Camp-level Grievance Redress Committee (CL-GRC) will be set up in each camp and will be responsible for reviewing each case and providing a resolution. If a case is not resolved at a camp-level, these will be remitted to the RRRC Grievance Redress Committee (RRRC-GRC) which will be at district level.

## **B. Disclosure Requirements**

The review of this Safeguards has been Deferred.

### Comments

Safeguards requirement has been deferred during project implementation since the proposed project is being prepared according to Paragraph 12 of IPF Policy.

The review of this Safeguards has been Deferred.

### Comments



Safeguards requirement has been deferred during project implementation since the proposed project is being prepared according to Paragraph 12 of IPF Policy.

**C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)**

**OP/BP/GP 4.01 - Environment Assessment**

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

NA

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

NA

**OP/BP 4.04 - Natural Habitats**

Would the project result in any significant conversion or degradation of critical natural habitats?

No

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?

NA

**OP/BP 4.11 - Physical Cultural Resources**

Does the EA include adequate measures related to cultural property?

NA

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

NA

**OP/BP 4.12 - Involuntary Resettlement**

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

NA

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

NA

**OP/BP 4.36 - Forests**

Has the sector-wide analysis of policy and institutional issues and constraints been carried out?

NA

Does the project design include satisfactory measures to overcome these constraints?



NA

Does the project finance commercial harvesting, and if so, does it include provisions for certification system?

No

#### **OP 7.50 - Projects on International Waterways**

Have the other riparians been notified of the project?

No

If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?

Yes

Has the RVP approved such an exception?

Yes

#### **The World Bank Policy on Disclosure of Information**

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

NA

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?

NA

#### **All Safeguard Policies**

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

NA

Have costs related to safeguard policy measures been included in the project cost?

NA

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

NA

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

NA

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**APPROVAL**

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