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# INTEGRATED SAFEGUARDS DATA SHEET APPRAISAL STAGE

**Report No.**: ISDSA1010

Date ISDS Prepared/Updated: 14-Sep-2014

Date ISDS Approved/Disclosed: 23-Sep-2014

### I. BASIC INFORMATION

### 1. Basic Project Data

				1	
Country:	Bangladesh		Project ID:	P146464	
Project Name:	Multipurpose Disaster Shelter Phase II (P146464)				
Task Team	Anna C. O'Donnell				
Leader:					
Estimated	22-Sep-2014		Estimated	18-Dec-2	2014
Appraisal Date:			<b>Board Date:</b>		
Managing Unit:	GSURR		Lending	Investme	nt Project Financing
			<b>Instrument:</b>		
Sector(s):	•	•	•		mary education (22%),
	Rural and Inter-Urban Roads and Highways (13%), Gen eral water, sanitation and flood protection sector (30%), Other social services (25%)				
Theme(s):	Natural disaster management (67%), Other public sector governance (10%),				
	Rural policies and institutions (15%), Other social develop ment (8%)				
Is this project pr	ocessed under	r OP 8.50 (Em	ergency Recov	very) or C	<b>OP</b> No
8.00 (Rapid Resp	onse to Crise	s and Emerger	ncies)?		
Financing (In U	SD Million)				
Total Project Cos	t: 371.79 Total Bank Financing: 370.00			370.00	
Financing Gap:	0.00	)			
Financing Sou	rce				Amount
BORROWER/RECIPIENT 1.				1.79	
International Development Association (IDA) 370			370.00		
Total	Total 371.79				
Environmental	al B - Partial Assessment				
Category:					
Is this a	No				
Repeater					
project?					

### 2. Project Development Objective(s)

The development objective of this project is to reduce the vulnerability of the coastal population to natural disasters across selected coastal districts of Bangladesh.

#### 3. Project Description

Component A: Reconstruction and Improvement of Multipurpose Shelters (US\$355 million). Lessons learned and continuous upgrading of the designs has led to a typology of shelters today that feature resilience to high wind speeds, safe haven for animals and livestock, water supply systems, separate sanitation facilities, and safe haven from storm surges. In addition, the shelters serve as community centers or primary schools during the year, providing wider community benefit to the coastal population. This component will finance the construction of around 550 new shelters (US\$221 million), the rehabilitation of around 450 existing shelters (US\$40.5 million), the improvement around 550 kilometers of rural roads to improve access and communication networks to shelters (US\$71.5 million), the preparation of environmental and social management plans (US\$8 million), and design and construction supervision (US\$14 million).

Component B: Project Management, Monitoring and Technical Assistance and Training (US\$15 million). This component will support the Government in implementing the project, and in coordinating all project related activities, monitoring, technical assistance and training. It will include: (B1) establishment of a Project Management Unit (PMU) within the Local Government Engineering Department (US\$9 million); (B2) monitoring and evaluation; and (B3) technical assistance and training in such areas as disaster management and preparedness, construction, contract management, financial management, preparation of environmental and social assessments, and preparation of EMPs and RAPS. It will also provide resources for strengthening the School Committees and CPP (US\$4 million). The monitoring and evaluation (M&E) activities would provide continuous feedback to the Government, the Bank, and implementing agencies on the project's performance and impact of its various components, so that corrective actions could be undertaken in a timely manner. They will also supervise implementation of the overall EMF and SMF, careful review and monitoring of sub-project specific social and environmental management plans and impact assessments, and supervision of their implementation.

Component C: Emergency Contingent Response Component (US\$0 million). 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 an Contingent Emergency Response Component (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; (iii) Local Government Engineering Department has 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.

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

The proposed MDSP will concentrate on improving the coverage of cyclone shelters to nine coastal districts facing high risks from cyclones, and where comprehensive early warning systems are currently present. The aim of the project will be to meet at least 80 percent of the required shelters for nine coastal districts. The project interventions for construction and improvement of shelters will be located in four Sidr-affected coastal districts including Bhola, Barisal, Pirojpur and Patuakhali and five other coastal districts including Chittagong, Cox's Bazaar, Feni, Laksmipur and Noakhali.

Cyclone shelters are constructed for multipurpose use, largely as primary schools. These

multipurpose shelters are generally established on the lands of existing education centers, community centers, and offices. Under a previous Bank-financed project, connecting roads to the shelters have been developed using the existing designated roads in agreement with the community. In circumstances where additional land for the expansion of roads was needed, the project reached agreements with the land owners along those roads. It is expected that this arrangement would continue under MDSP. As MDSP targets the expansion of facilities in critically vulnerable areas, private lands may also be used in unavoidable circumstances, in particular for construction of new shelters and improvement of the existing ones and for access road construction.

Shelters will fulfill multipurpose uses, most notably as educational facilities for primary education. This investment will enable an improved environment for classroom learning for students, and is expected to improve school management through the provision of structurally sound buildings, improved furniture, water supply, sanitation facilities for both boys and girls, electricity, etc.. The improved buildings of the schools/community centres will be used as shelters only in events of cyclone and flooding. The existing use of the premises will continue without any interruption from any corner, public or private.

The location of new disaster shelters, sites for improvement of existing shelters and alignment of shelter connecting roads will be identified through all inclusive consultative process. Population, location, vulnerability of communities to disasters and availability of shelters around the location will provide the bases for demand and availability of land for civil works construction will provide site readiness. Final site selection will review and confirm agreement of the communities and availability of lands for construction. In case of voluntary donation of land, direct purchase or exchange of lands for sites (building and/or road), the land owners must voluntarily agree on such acts and LGED will execute the land taking with documentary evidences. With the experience from the ongoing ECRRP, LGED will select to avoid land acquisition for the project in the current phase. In circumstances that lands through donation, direct purchase or exchange are not available but the intervention is critically required in future; LGED will go for involuntary acquisition of lands, as the last resort, complying with the requirements of the Bank OP 4.12 on Involuntary Resettlement. Voluntary donation, direct purchase or exchange of lands will be executed in a manner that the acts are voluntary and unbiased will of the owners without any threat or coercion

#### 5. Environmental and Social Safeguards Specialists

Nadia Sharmin (GSURR) Md. Akhtaruzzaman (GSURR) Iqbal Ahmed (GENDR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The new shelter/school building with access road will be constructed at the same premises of the existing schools. The specific locations will be identified during implementation stage The environmental impacts of the project are expected to be mostly construction related and limited within the project boundaries. These impacts can be mitigated through implementation of appropriate environmental code of practice and

		environmental management plan.
		In view of subprojects nature, the project is classified as a Category 'B' and the safeguard policy OP/BP 4.01 has been triggered to ensure that the sub project design and implementation will be focused on reducing adverse impacts and enhancing positive impacts. Since the exact location of the project will not be known before implementation, a framework approach for both environment and social will be adopted for proper environment/social management.
		Environment and Social Management Framework (ESMF) will lay out the policy requirement, likely impacts, environmental code of practice and how these will be addressed under the project. Once the sites of the shelters are known, site specific Environmental Impact Screening and Social Assessment will be conducted, and, if applicable, a Resettlement Action Plan, will be prepared and submitted at the time of detailed designs of the shelters. These will be independently reviewed by Environment and Social Specialists, to be retained by the PMU. Lessons from previous project will be utilized for the improved design of shelters by incorporating environmental and social aspect
Natural Habitats OP/BP 4.04	No	The project does not involve any conversion or degradation of critical natural habitats.
Forests OP/BP 4.36	No	The new shelter cum school building with access road under the project will be constructed at the open premises of the existing schools. There is no possibility for affecting forest consist of either closed forest formations or open forest
Pest Management OP 4.09	No	The activities of the project will not involve any pesticide application and no environmental and health risks are associated
Physical Cultural Resources OP/BP 4.11	No	The new shelter cum school building with access road under the project will be constructed at the open premises of the existing schools, There is no possibility of any adverse impacts on archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural resources resulting from project activities.
Indigenous Peoples OP/BP 4.10	No	The project will be implemented in nine coastal

		districts. According to the social assessment done by LGED, a tiny little portion of the country's tribal communities, having some of the characteristics like indigenous language and culture, are living in these districts. These tribal peoples do not possess any ancestral territory and customary political institutions/governance system (as laid down in the OP 4.10). They are living within the mainstream population and do not rely distinctly on natural resources. They also speak national Bangla language and are treated equally under the national administrative and
Involuntary Resettlement OP/BP 4.12	Yes	The project aims to maximize access to disaster shelters for the coastal population and reduce their vulnerability to cyclones and extreme weather events. This objective will be achieved by improving existing multi-purpose shelters, constructing new disaster shelters, and improving roads and connectivity in the area. The construction and improvement works will be carried out within existing lands of local educational and social institutions. However, lands under some of these existing infrastructures are likely to be under authorized and unauthorized private uses (residential, commercial and others). Infrastructure improvement may also need additional lands in critical situations to be obtained from private ownerships or occupancies. Although minimum, additional private land and/or displacement of private people from public lands are likely in cases of development of shelter connecting rural roads. Application of Bank policy on Involuntary Resettlement (OP 4.12) will be understood only when sites for construction or improvement of shelters will be identified and design. The SMF will therefore include resettlement policy framework (RPF), consistent with the OP 4.12, to address social safeguard issues arising at project design and implementation stage. The social inclusion framework with the SMF will guide inclusive design and implementation. The SMF will guide LGED in carrying out social assessment of each construction site (shelters and connecting roads), and prepare social management plan (SMP), resettlement action plan (RAP) for annual

		construction packages in compliance with the OP 4.12 and where applicable with the OP 4.10. The elements of RPF will guide LGED in preparing RAPs or Abbreviated RAPs as necessary. The SMP will be prepared for sites/packages where additional lands will not be acquired and displacement of peoples will not be involuntary covering GRM, consultation, M&E, and the like. The SMF should provide an entitlement framework outlining eligibility and entitlement based on tenancy, extent of losses and vulnerability, and intuitional and legal framework for management of voluntary land donation, direct purchase and exchange of lands for construction new shelter buildings and shelter connecting roads.
Safety of Dams OP/BP 4.37	No	The project does not finance any new dams.
Projects on International Waterways OP/BP 7.50	No	The project activities does not disturb any river, canal, lake, or similar body of water that forms a boundary between, or any river or body of surface water that flows through, two or more states or any bay, gulf, strait, or channel bounded by two or more states.
Projects in Disputed Areas OP/BP 7.60	No	The subprojects will not fall any disputed area.

#### II. Key Safeguard Policy Issues and Their Management

### A. Summary of Key Safeguard Issues

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

The project interventions under the MDSP involving social and environmental issues and impacts include (i) construction and improvement of multipurpose disaster shelters and (ii) improvement of shelter connecting roads. The specific locations will be identified during implementation stage. The environmental impacts of the project are expected to be mostly construction related and limited within the project boundaries. The project is classified as a Category B project, since no significant and/or irreversible adverse environmental issues are expected from the construction of shelter buildings. The policy on environment assessment (OP/BP 4.01) has been triggered for the proposed operation to ensure that the project design and implementation will be environmentally sound and sustainable.

The investment on the physical component of the project will yield net positive impacts. Project benefits for multipurpose disaster shelters include (i) ensuring safe sheltering of the project beneficiaries at the event of any disasters including cyclone, (ii) provide congenial learning environment and sufficient space in the classrooms at multipurpose shelters, (iii) overall improved schooling facilities and environment to be ensured at multipurpose disaster shelters conducive to children's learning, and (iv) affected people also will be able to bring their cattle to keep at safe

shelters at the event of any disasters. There is provision of Access Road and Associated Structures to the Disaster Shelters so that the shelters can be accessed safely. Separate floor for sheltering livestock will save quite a number of cattle and other livestock. The site will be developed and enhanced through a Land Use Plan and Tree Plantation. The ancillary provisions in the shelters stemmed out from environmental considerations. These provisions include solar panel benefits for clean energy for the users. One of the most important needs during and after cyclones is the availability of drinking water. To deter this, tube-wells on raised platform pumping safe water will be installed in the shelters. There will be provisions of rain water harvesting facilities in the shelters. First-Aid Boxes will be placed for each Shelter to take care of immediate requirements and there will be Separate Room for Pregnant Women during occupancy in the shelters. Provision of Store Rooms will solve storing of materials otherwise kept here and there creating environmental problems.

The negative environmental impacts will be triggered mostly from the construction related activities. In general the impacts due to shelter construction activities may include: drainage congestion, noise pollution, air pollution, water pollution, organic and construction waste pollution etc. Temporary drainage congestion often results from obstruction to natural flow of drainage water due to the storage of materials or improper dumping. Noise and air pollution could results from a wide range of construction activities, including foundation pilling, movement of vehicles, operation of construction equipment and generators. Water pollution may result from discharge of waste (from labor shed or site) and spills and leaks of oils/ chemical into water bodies (e.g., drain, pond, khal, river). In addition, the Environmental Health and Safety (EHS) issues like occupational safety of workers, movement of students at construction area should take on account during construction. However, these impacts are mostly temporary and limited within subproject boundary.

Past experience from similar project ECRRP, does not envisage any land acquisition or population displacement. Lands owned by the sponsoring local educational and social institutions will be used for construction of new shelter and horizontal extension of existing ones. In cases of unavailability of institutional lands, participatory approaches of voluntary donation, direct purchase or exchange by the sponsoring institutions will be followed for obtaining lands. Although it is highly unlikely that private lands and/or public land from private users will be required; considering any chance of extreme circumstances in future when LGED may require to acquire private lands and/or public land from private uses, World Bank's Operational Policy on Involuntary Resettlement (OP/BP 4.12) has been triggered to effectively manage involuntary resettlement.

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

Experience from the similar activities of Emergency Cyclone Rehabilitation and Restoration Project (ECRRP) shows that the negative environmental impacts will be triggered mostly from the construction related activities. These impacts are mostly temporary and limited within project boundary.

According to the ESMF, both environmental and social screening will be performed of any potential indirect or long-term adverse impacts and taking necessary mitigation measures to ensure minimal impacts. The new cyclone shelter and road construction will require environmental assessment in planning stage.

The new cyclone shelters and access roads may require land acquisition and hence will require site

specific Social Impact Assessments and Resettlement Action Plans (RAPs) in accordance with the ESMF.

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

All sub-projects will be subject to an environmental screening at an appropriate level of assessment based on the agreed ESMF. The screening process will distinguish sub-projects requiring an environmental review or more detailed environmental assessments. The later is expected for the new construction (e.g. new disaster shelters or realignment of embankments) and full environment assessment will be carried out with sound environmental professional (and cleared by the Bank). These sub-projects will continue to undergo an analysis of alternatives specially the location and design as required under standard EA practice. Certain criteria to select the sites for the cyclone shelters with due processes and design including environmental parameters are to be followed to prioritize the selection by:

- Series of Consultation Meetings to be organized between Local Government Bodies (UP/WC), elites and local stakeholders of the area to select the location of shelters.
- Necessary surveys on the parameters such as physical location, socio-economic condition, communication, environmental aspects etc. with public consultations to solicit wisdom and experience and reflect the aspirations of people.

## 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.

Since the exact location of the project will not be known before implementation, a framework approach for both environment and social will be adopted for proper environment/social management.

The implementing agency Local Government Engineering Department (LGED) developed an Environment Social Management Framework (ESMF) based on overall environment/social assessment, the findings of environmental/social studies of ECRRP, field level consultation, country's overall policy framework, national legislation, World Bank safeguard policies, and institutional capabilities related to the safeguard aspects. The ESMF will be the guiding document for subproject-specific: (i) environmental/social screening; (ii) impacts assessment; (iii) consultation and disclosure; (IV) preparation of environmental/social management plan (EMP/SMP) and resettlement action plan (RAP) including budget (v) sample BoQ and special environmental clauses (SECs) for constructions/civil works etc. In addition, the relevant Environmental, Health and Safety Guidelines of the World Bank Group/International Finance Corporation (IFC) will be applicable to the project.

LGED has also designed a Grievance Response Mechanism (GRM) to answer to queries, receive suggestions and address complaints and grievances about any irregularities in application of the guidelines adopted in this framework for inclusive project design, and assessment and mitigation of social and eenvironmental impacts.

The PMU will have a Senior Environment Specialist and a Senior Social Specialist. In addition LGED will procure the design and supervision consultant (DSC) firm and monitoring and evaluation (M&E) firm. Each of them will have their own environment specialist and social development specialist separately. The environment specialist of DSC consultant will prepare the environment screening/assessment report along with EMPs. If additional environmental assessment is necessary, LGED will take necessary steps for carrying out the assessment (e.g., through hiring a Consultant). The Social Development Specialists of DSC will prepare the social

screening/assessment report along with SMPs and RAPs. The LGED will also be responsible for getting necessary environmental clearance from the Department of Environment (DoE).

An independent M&E consultant will be responsible to review, supervise and monitor activities for environmental and social safeguards compliance of all subprojects.

The LGED has developed its institutional capacity on environmental management through the same nature of project ECRRP and another IDA funded project Rural Transport Improvement Project (RTIP-I and II). The project supported the capacity building and environmental guidelines for the LGED projects. An Environmental Unit headed by the Additional Chief Engineer (Maintenance) has been established in LGED. Through RTIP II, LGED is currently working on strengthening of the Environmental Unit and also the training of the LGED officials and staff on environmental management.

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

The key stakeholders in the project are those are vulnerable to frequent cyclone in the coastal areas. The ESMF was prepared in consultation with the local communities, NGOs and government officials/agencies. The subproject specific EA (environmental screening and/or assessment) and SIA (social impact assessment) and EMP, Social Management Plan (SMP) and Resettlement Action Plan (RAP), where required, will be prepared in consultation with affected communities and the draft will again be consulted with communities and NGOs. EIAs/EMPs and SMPs/RAPs are and will also be published in the website for public information and comments.

The draft ESMF along with the Bengali translation will be disclosed on the implementing agencies website by August 15, 2014 for public comment. A national consultation workshop will be held before appraisal of the project. The final ESMF will incorporate the comments from consultation workshop, public and World Bank and will be re-disclosed on the implementing agency's website. Upon request from LGED, the documents will be disclosed at World Bank's Infoshop before appraisal.

Consultation with communities has been made mandatory for environmental screening/assessment of each subproject. The subproject specific environmental screening/assessment will also be disclosed before the contract mobilization.

#### **B.** Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other		
Date of receipt by the Bank	07-Aug-2014	
Date of submission to InfoShop	04-Sep-2014	
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors		
"In country" Disclosure		
Bangladesh	28-Aug-2014	
Comments:		
Resettlement Action Plan/Framework/Policy Process		
Date of receipt by the Bank	07-Aug-2014	
Date of submission to InfoShop	04-Sep-2014	

28-Aug-2014
tural Resources policies, the Environmental Assessment/
ected, please explain why:
1

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

OP/BP/GP 4.01 - Environment Assessment			
Does the project require a stand-alone EA (including EMP) report?		No [ × ]	NA[]
OP/BP 4.12 - Involuntary Resettlement			
Has a resettlement plan/abbreviated plan/policy framework/ process framework (as appropriate) been prepared?	Yes [ ]	No [ × ]	NA[]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [ ]	No [ ]	NA[]
The World Bank Policy on Disclosure of Information			
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [ ]	No [ ]	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?	Yes [ ]	No [ ]	NA[]
All Safeguard Policies			
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [×]	No [ ]	NA[]
Have costs related to safeguard policy measures been included in the project cost?	Yes [×]	No [ ]	NA [ ]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [×]	No [ ]	NA[]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [×]	No [ ]	NA[]

### III. APPROVALS

Task Team Leader:	Name: Anna C. O'Donnell				
Approved By					
	Name: Francis V. Fragano (RSA)	Date: 22-Sep-2014			
Advisor:					

Practice Manager/	Name: Bernice K. Van Bronkhorst (PMGR)	Date: 23-Sep-2014
Manager:		